

June 20, 2016

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

RE: DONALD (b) (6) HUBER
(b) (6)
LION PERMIT

To Whom it May Concern:

I purchased a \$60,000 Lion Hunt for Zambia in February of 2015 for a September 2016 hunt.

I understand U.S. Fish and Wildlife now requires a Cities Permit for Lions. Enclosed is a completed Cities Permit Application and my check in the amount of \$100. Please let me know if there is anything further I need to do as I am scheduled to fly out September 10, 2016 for my hunt September 12, 2016.

Thank you,



Don Huber

(b) (6)

White Sulphur Springs, WV (b) (6)

e-mail: (b) (6)

(b) (6)

enclosures



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 28 2016

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

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

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

A. Complete if applying as an individual			
1.a. Last name Huber	1.b. First name Donald	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions) NA
6.a. Telephone number (b) (6)	6.b. Fax number NA	6.c. 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 White Sulphur Springs	1.c. State WV	1.d. Zip code/Postal code: (b) (6)	1.e. Country USA
1.f. (include if different than physical address; include name of contact person if applicable) (b) (6)			
2.b. City White Sulphur Springs	2.c. State WV	2.d. Zip code/Postal code: (b) (6)	2.e. Country USA

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <u>43490B</u> No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <u>Donald Huber</u> Signature (in blue ink) of <u>(b) (6)</u> person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) <u>6/20/16</u>	

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

LION

b. Sex (if known).

MALE

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

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

Lower Lupande hunting Block, in The Luanga Valley

Chipata Eastern Zambia.

Area - MFUWE GPS - S13.14775 E031 38 880

b. Date wildlife is to be hunted: September - 12, 30 2016

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

Skull, Life Size mount

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

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

b. Date wildlife was hunted:

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:
4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Mary-Anne Fernandes
Business Name: Highveld Taxidermists
Address: P.O. Box 34242
Address: Farm 354, Vlakplatts, Hennopsriver 0023, South Africa
City: Erasmia
State/Province:
Country, Postal Code: South Africa 0023

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

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

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

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

Taxidermist/Broker's signature: _____ Date: _____

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

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

Applicant's signature: Donald (b)(6) Hake Date: 6/20/16

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

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).
9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):
10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.
- ☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.
11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
DONALD (b) (6) HUBER (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 JUN 28 2016

Bank of America Advantage

(b) (6)
DONALD (b) (6) HUBER
(b) (6)
WINDERMERE, FL (b) (6)

6/20/16

Date

Pay to the order of US Fish + Wildlife Services \$ 100.00
One hundred + Dollars

Bank of America

ACH R/T 063100277

Memo

Lion 2016 Unt Don Huber

(b) (6)



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

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

Federal Fish and Wildlife Permit Application Form

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

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

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

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

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

C. All applicants complete address information					
1.a. Physical address (Street address; Apartment #, Suite #, or Room #: no P.O. Boxes) (b) (6)					
1.b. City Carrollton	1.c. State TX	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province	1.f. Country USA	
2.a. Mailing address (if different from physical address) (b) (6)					
2.b. City Dallas	2.c. State TX	2.d. Zip code/Postal code: (b) (6)	2.e. County/Province	2.f. Country USA	

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Amanda Henson 4-25-16 Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)	

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

P. l. melanochaita (African lion)

b. Sex (if known).

Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

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, horn, tusks).

All parts including skin, skull, teeth, and claws

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

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

N/A

b. Date wildlife was hunted:

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

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

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

Name:

Business Name:

Address:

Address:

City:

State/Province:

Country, Postal Code:

Michael W. Borman
Bangweulu Taxidermy LTD
4142/K Chifwema Road
New Kasama
LUSAKA
LUSAKA Province
Zambia

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

Please see information provided by Conservation Force, Zambian authorities, and Zambian operators.

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

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

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

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

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

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

Applicant's signature: Aranda Henson Date: 4-25-16

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/lc/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

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

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

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

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

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

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

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

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import 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@atl.net
E: regina.lennox@conservationforce.org

Signed: Amanda Henson

Name: Amanda Henson

Date: 4-25-16

RCVD AUG 5 2016

81-106/829 (b) (6)

ROBERT (b) (6) HIXSON (b) (6)
(b) (6) DALLAS, TX (b) (6)

DATE 4/26/16

PAY TO THE ORDER OF U.S. Fish & Wildlife \$ 100⁰⁰
One Hundred & 00/100 DOLLARS

Relyance Bank
P.O. Box 7878
Pine Bluff, Arkansas 71611
www.relybank.com
870-535-7222

MEMO Amanda Henson Ricky Hixson

(b) (6)



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

Federal Fish and Wildlife Permit Application Form

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

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

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

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

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

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

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 2006-05US10878179 2002-01US04360519 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. [Signature] Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) 9/23/14 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/bv-form-number/index.html>) and return your original permit with that form.

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

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

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

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

1. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

P. l. melanochaita (African lion)

b. Sex (if known).

Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

*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, horn, tusks).

All parts including skin, skull, teeth, and claws

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

~~a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):~~

~~N/A~~

~~b. Date wildlife was hunted:~~

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

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

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

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

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

- ~~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: 4/25/16

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/lc/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).
9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):
10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.
- ☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.
11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
John J. Jackson, III or Regina Lennox of Conservation Force
504-837-1233, jjw-no2@att.net or regina.lennox@conservationforce.org
12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?
- ☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

RCVD AUG 5 2016

BORER (b) (6) HIXSON (b) (6)		81-108/829	(b) (6)
(b) (6)		DATE	4/26/16
DALLAS, TX (b) (6)			
PAY TO THE ORDER OF	US Fish + Wildlife	\$	100 ⁰⁰
One Hundred & 00/100		DOLLARS	
Relyance Bank		P.O. Box 7878 Pine Bluff, Arkansas 71611 www.relybank.com 870-535-7222	
MEMO	Robert & L Hixson Jr	Randy A. Hixson	
(b) (6)			



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

Federal Fish and Wildlife Permit Application Form

RCVD AUG 5 2016

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

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

Type of Activity:

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

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

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

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

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

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in Instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 4/13/14 - 6/12/15 LA-1420-TANZANIA 140599433A/9 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Stephen (b) (6) Crooks Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) 4/18/2016 Date of signature (mm/dd/yyyy)	

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
P. l. melanochaita (African lion)
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
ZAMBIA - Chifunda GMA
Closest City - Lusaka
 - b. Date wildlife is to be hunted:
2016
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
All parts including skin, skull, teeth, and claws
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
N/A
 - b. Date wildlife was hunted:

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

**COMPLETE SKIN, SKULL, TEETH + CLAWS
FOR A 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]:

**PO BOX 390003
LUMUMBA ROAD
LUSAKA, ZAMBIA**

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

Name:

Business Name:

MUCHINGA ADVENTURES LTD.

Address:

PO BOX 390003

Address:

LUMUMBA ROAD

City:

LUSAKA, ZAMBIA

State/Province:

Country, Postal Code:

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

Please see information provided by Conservation Force, Zambian authorities, and Zambian operators.

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

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

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

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

~~Date: _____~~

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

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

Applicant's signature: Stephen (b) (6) Crabbs

Date: 4/18/16

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 ^{FedEx} courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

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

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

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

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

NOTICE OF REPRESENTATION

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

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

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

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

Signed: Stephen (b) (6) Crooks
Name: STEPHEN (b) (6) Crooks
Date: 4/18/16

RCVD AUG 5 2016

STEPHEN CROOKS 01-02 74-1001/724 (b) (6)

(b) (6)

STANTON, MI (b) (6) DATE April 18, 2016

Paid to the order of U.S. Fish & Wildlife Service \$ 100.00
One hundred and 00/100 Dollars

CHEMICAL BANK.
ChemicalBankMI.com

Steve Crooks

(b) (6)

† 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.
CHRISSE JACKSON
PHILIPPE CHARDONNET, D.V.M.
BERT KLINEBURGER
SHANE MAHONEY
DALE TOWELL, PH.D.

October 12, 2016

RCVD OCT 25 2016

LB

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

Re: Application for Import of a Sport-Hunted Lion Trophy from Zimbabwe

Dear Chief Van Norman,

Enclosed please find one permit application for import of an African lion trophy from Zimbabwe on behalf of Mr. Thomas Whaley (b)(6).

Please refer to the documents and responses previously submitted to the DMA by Conservation Force, the government and wildlife authorities of Zimbabwe, professional hunters and operators, professional hunting organizations, and others, which demonstrate that Zimbabwe's lion hunting program is well-managed and the hunting enhances the survival of the lion in the wild.

Sincerely,



John J. Jackson, III

NOTICE OF REPRESENTATION

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

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

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

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

Signed: TH (b) (6) W (b) (6)
Name: Thomas (b) (6) Whaley (b) (6)
Date: 10/04/2016



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

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

RCVD OCT 25 2016

LB

Federal Fish and Wildlife Permit Application Form

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

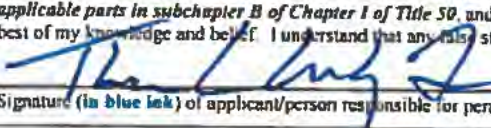
Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES Threatened-listed
(Appendix I of CITES and/or **ESA**) lion

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

A. Complete if applying as an individual			
1 a Last name WHALEY	1 b First name THOMAS	1 c Middle name/initial (b) (6)	
2 Date of birth (mm/dd/yyyy) (b) (6)	3 Social Security No. (b) (6)	4 Occupation (b) (6)	5 Affiliation/ Doing business as (see instructions)
6 a Telephone number (b) (6)	6 b Alternate telephone number (b) (6)	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 MARSHALL	1 c State TX	1 d Zip code/Postal code (b) (6)	1 e Country USA
1 f If applicant is not a U.S. resident, include name of contact person if applicable (b) (6)			
2 b City MARSHALL	2 c State TX	2 d Zip code/Postal code (b) (6)	2 e Country USA

D. All applicants MUST complete	
1	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue _____ No <input checked="" type="checkbox"/>
3	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)
	10/04/2016 Date of signature (mm/dd/yyyy)

Please continue to next page

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

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

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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 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

P. l. melanochaita (African lion)

b. Sex (if known).

Male

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

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

DEKA TAIL SAFARI AREA, ZIMBABWE, AFRICA

b. Date wildlife is to be hunted:

MAY 1-21, 2017

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

All parts including skin, skull, teeth, and claws

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

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

N/A

b. Date wildlife was hunted:

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

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

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

Name: **CHIPITANI SAFARI COMPANY**
Business Name: **8 RIVONIA DRIVE**
Address: **MOUNT PLEASANT**
City: **HARARE, ZIMBABWE**
State/Province: **AFRICA**
Country, Postal Code:

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

Please see information provided by Conservation Force, Buby and Save Valley Conservancies, and Zimbabwe authorities.
CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

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

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

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

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

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

Applicant's signature:  Date: 10/04/2016

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

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

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

(b) (6)

MARSHALL, TX

(b) (6)

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

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

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

John J. Jackson, III or Regina Lennox of Conservation Force

504-837-1233, jjw-no2@att.net or regina.lennox@conservationforce.com

(b) (6)

Thomas Whaley

(b) (6)

(b) (6)

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

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

(b) (6)

(b) (6)

Pay to the Order of U.S. Fish & Wildlife Service Date 10/04/16
ONE hundred & no/100 \$ 100.00



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RCVD OCT 25 2016

† BARN BERTRAND DES CLERS, Ph.D.
† JAMES G. TEER, Ph.D.
† BART O'GARA, Ph.D.
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December 9, 2016

RCVD DEC 15 2016

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

Re: Application for Import of Sport-Hunted Lion Trophy:

Dear Chief Van Norman:

Enclosed please find one application to import an African lion trophy from Zimbabwe, which was hunted in the Dande North concession.

Please refer to the documents and responses previously submitted to the DMA by Conservation Force, Zimbabwe's wildlife authorities, professional hunters and operators including Charlton McCallum Safaris (CMS) and the Dande Anti-Poaching Unit (DAPU), professional hunting organizations, and others. We also enclose with this letter two 2016 update reports by DAPU, and respectfully refer to the Custodians of the Wilderness video in the Zambezi Valley, Zimbabwe, which discusses the work of CMS and DAPU. It is available at <https://vimeo.com/165256789>. This information demonstrates that Zimbabwe's lion hunting program is well-managed, and the hunting enhances the survival of the lion.

Sincerely,



John J. Jackson, III

Attachments:

1. Application
2. DAPU 2016 First Report
3. DAPU 2016 Second Report

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 named, constituted and appointed John J. Jackson, III, Conservation Force, 3240 S. I-10 Service Rd. W., Suite 200, Metairie, Louisiana, 70001, telephone (504) 837-1233, FAX (504) 837-1145, jjw-no@att.net as my attorney and legal representative for all matters concerning my elephant import permit application.

This authority is all inclusive, including, but not limited to permit filing, permit supplementation, reconsideration, administrative appeal and request for time delays or extensions.

I also request that John J. Jackson, III be copied with all correspondence, acknowledgements, notices and decisions concerning my permit during its processing and during any and all steps in its administrative reconsideration or appeal.



DAN ONGNA



DATE



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

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

Federal Fish and Wildlife Permit Application Form

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

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

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

A. Complete if applying as an individual			
1 a. Last name ONGENA	1 b. First name DANIEL	1 c. Middle name or initial (b) (6)	1 d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security Number (b) (6)	5. Affiliation/Doing business as (see instructions)	
4 a. Telephone number (b) (6)	4 b. Alternate telephone number	4 c. Fax number	4 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 Stevens Point	1 c. State WI	1 d. Zip code/Postal code (b) (6)	1 e. County/Province	1 f. Country USA
2 a. Mailing Address (include if different than physical address, include name of contact person if applicable)				
2 b. City	2 c. State	2 d. Zip code/Postal code	2 e. County/Province	2 f. Country

D. All applicants MUST complete	
1	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 16USD7994C19 No <input type="checkbox"/>
3	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief, and understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Daniel Ongena Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 11/10/2016

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

P. l. melanochaita (African lion)

b. Sex (if known).

Male

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

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

b. Date wildlife is to be hunted:

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

All parts including skin, skull, teeth, and claws

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

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

N/A

Dande North, Zimbabwe

b. Date wildlife was hunted:

July 3, 2016

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

skin, skull, claws
with teeth

- d. The current location of the trophy (address and country) [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]:

Zimbabwe

~~Afropide~~ Afropide Freight Express
1303 Picnic Park
Waterfalls, Harare

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

Name:

Business Name:

Address: 1303 Picnic Park

Address: waterfalls

City: Harare

State/Province:

Country, Postal Code: Zimbabwe

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

Please see information provided by Conservation Force, Bubyee and Save Valley Conservancies, and Zimbabwe authorities. **CERTIFICATION STATEMENT** (original signature must be provided for either 6 or 7 below)

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

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

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

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

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

Applicant's signature: David Oyer Date: 11-10-16

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 proposed activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

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

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):

Daniel Onaga

(b) (6)

Stevens Point, WI

(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):

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

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

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



First quarter newsletter 2016

Dear Friends,

Thank you all so much for your support thus far. DAPU has gotten off to an excellent and most productive start in 2016!

Changes

In 2015 Bongi was seriously over worked so Muno has been moved over from the East to help Bongi in the North so we now have them both pretty much full time keeping on top of DAPU.

Alfa who many of you will remember from the East, started off as a general hand, was then promoted to waiter, then cook and now the manager of the East. In the off-season Alfa spent two months apprenticing under Bongi, and we put him through his driver's license and we are happy to say so far he has done an excellent job!

Snaring & general poaching.

January, February, March and April of 2016 has been a fair bit quieter than the same period of 2015 in terms of snares picked up and meat poachers arrested. DAPU has more and more of a structured presence every month and has a much wider informer network.

Summary of successes first quarter 2016.

Month	No. of snares	Dogs shot	Meat Poachers convicted	Elephant poachers	Weapons retrieved		Jail time months
January	300	0	3	0	0	US\$821	
February	208	0	0	2	0	US\$978	216
March	95	0	0		0	US\$97	
April	137	0	1	0	2	US\$321	6
	740	0	4	2	2	US\$2,217	222

Summary of successes first quarter 2015.

Column1	No. of snares	Dogs shot	Meat Poachers convicted	Elephant poachers	Weapons retrieved	Rewards paid
January	309	0	5	0	0	US\$1,518
February	454	0	0	0	0	US\$908
March	168	1	1	0	0	US\$336
April	210	1	1	0	0	US\$420
	1141	2	7	0	0	US\$3,182

*****For the sake of comparison I have included 2015 statistics for the same period and it shows that snares picked up are down 35%, and meat poachers down by 42% - both are important indicators to us. *****

Elephant poaching.

In February two youngsters were caught and convicted for being in possession of ivory (from Mozambique). Both really young guys and both were sentenced to 9 years in prison. You can see below how pathetic the ivory is yet these folk are so poor that they will risk it.



To date one elephant carcass has been reported in Dande – poached in the “off season” near the Manyemu “cliffs” area. Muno and his Dapu scouts just yesterday arrested one of the locals, dressed up in a stolen National Parks uniform in close proximity of the elephant carcass. He was tried and sentenced to 6 months in prison. He also admitted to being the “guide” for three poachers from Harare who came down to Dande and shot the elephant. Shots were heard in the Broken Bridge area but no carcass was found.



***** Convicted 6 months - stolen National Parks uniform. *****



***** The poached elephant*****

Problem Animal Control.

Duties for DAPU scouts also include attending to Problem Animal reports (PAC).

*a. **Elephant** - Due to the severe drought, there has been very little in the way of crops for the elephants to destroy hence genuine PAC reports than usual. The scouts, Bongi, Muno and Alfa have managed to keep on top of all reports and we have not had to shoot any PAC elephants.*

*b. **Lions** - Nothing much to report to date. Lots of lions around BUT no PAC. One of our road gangs had a run in with a pride of 12 lion and had to spend the night up trees. Three of the staff had to go to the Angwa Bridge clinic for stitches as the injured themselves whilst climbing!*

*c. **Buffalo** - One man was badly injured mid- April by a buffalo in the Dande East. He is currently fighting for his life in a mission hospital.*

*d. **Crocs** - Nothing to report yet.*

*e. **Snake bites** - Nothing to report yet.*

Thanks to SCI and our valued clients, the scouts all have good quality waterproof tents, new uniforms and almost all the kit that they need to do their jobs safely and comfortably. The only urgent outstanding piece of "kit" is boots - and those we are hopeful will be coming from the USA soon.

Goals for Second quarter 2016.

- 1. Continue with anti-poaching patrols.*
- 2. Replace scouts that are not performing.*
- 3. Early burning will start in May as soon as it is dry enough.*
- 4. Repair firearms where possible or replace*
- 5. New boots.*
- 6. **Land cruiser (ABK 7074) rebuild.***

As most of you know Safari Club International donated \$8,900.00 to DAPU in January of 2016. Buzz and I decided to "retire" (scrap) the oldest cruiser in the fleet - fondly referred to as "Boko Haram" and use what parts we could to bring back to life the second oldest vehicle (Buzz's original hunting vehicle) to become the primary DAPU vehicle in the "East". Well the work is 99% complete, the vehicle looks great and it cost \$7,616.00 leaving DAPU with a surplus of \$1284.00 - which we have used, on uniforms.

There is no doubt that by every measure we are ahead of where we were at the same time in 2015 and WAY ahead of 2014. All the very best and thank you to all of you whom have helped make DAPU possible!

Buzz and Myles



***** Buzz handing over ABK 7074 to Alfa (DAPU Dande East)***
Thanks to SCI for the re build and Mr. Shores for the new tires!**



***** New Tents for DAPU – genuinely waterproof, old fashioned made in Harare*****

DAPU Income and Expenses 2016

First quarter.

Income

Clients	US\$12,783.00
SCI	US\$8,900.00
CMS	US\$15,071.25
	<u>US\$36,754.25</u>

Expenses

1 Wages, rewards and rations.

	<u>Scouts</u>	<u>Management Bongi Muno & Alfa</u>	<u>Rations</u>	<u>Rewards</u>	<u>Total</u>
January	US\$1,100	US\$1,605	US\$770	US\$821	US\$4,296
February	US\$1,100	US\$1,605	US\$770	US\$978	US\$4,453
March	US\$1,100	US\$1,605	US\$770	US\$97	US\$3,572
April	US\$1,100	US\$1,605	US\$770	US\$321	US\$3,796
	<u>US\$4,400</u>	<u>US\$6,420</u>	<u>US\$3,080</u>	<u>US\$2,217</u>	<u>US\$16,117</u>

2 2016 DAPU equipment expenses

DAPU Ammunition - National Cartridges	US\$362.00
DAPU tents - Mabels Canvas	US\$2,242.50
Uniform downsizing	US\$330.00
Uniforms	US\$1,078.00
Dapu # 1 Toyota Land Cruiser AAX 9832 - Grease Junky	US\$2,230.75
Dapu # 1 Toyota Land Cruiser AAX 9832 - Tineo Enterprises	US\$1,078.00
Dapu # 2 ABK 7074 - Alpine panel beaters	US\$1,437.00
DAPU # 2 ABK 7074 Burj Auto	US\$1,425.00
DAPU # 2 ABK 7074 Grease Junky	US\$3,974.00
DAPU # 2 ABK 7074 Windscreen	US\$60.00
DAPU # 2 ABK 7074 injector pump Geribran services	US\$720.00
	<u>US\$14,937.25</u>

3 Vehicles (2).

Mileage ABM 5149 Jan - April 3400 kms x \$.5/ km	US\$1,700
Mileage AAX 9832 Jan - April = 8000 * .5/km	US\$4,000
	<u>US\$5,700</u>
Total expenses	<u>US\$36,754</u>
Shortfall	<u>US\$0</u>



Second quarter newsletter 2016

Dear Friends,

Thank you all so much for your continued support! The second quarter has been very promising in terms of snares recovered (less than 2014 and 2015 over the same period) BUT... unfortunately we lost three elephants to poachers in June. Clearly a new "gang" has moved in. National Parks in Chewore had a contact with armed poachers, soon after the discovery of the Dande carcasses and one poacher was killed. Things have been quiet since so we are really hoping that the gang that was taken out, was the one responsible for the Dande poaching. Informants say that they are different gangs – time will tell.

Snaring & general poaching.

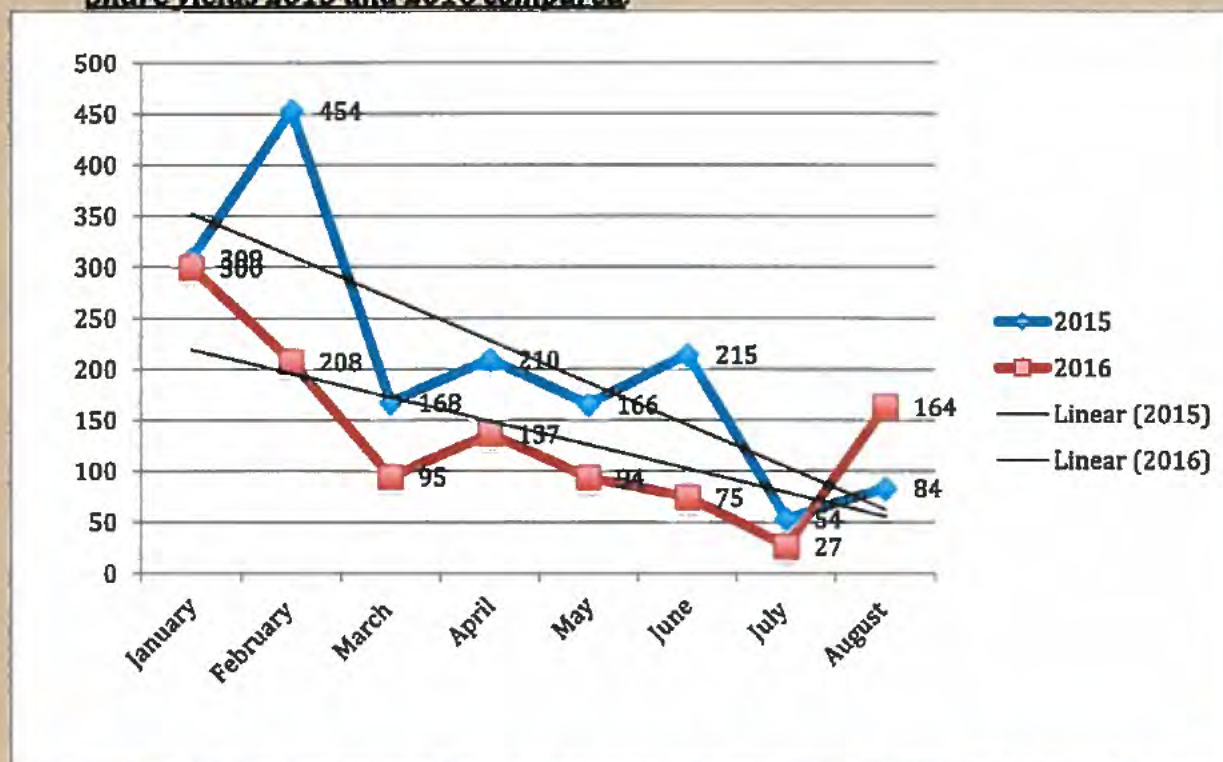
May, June, July and August of 2016 has been a fair bit quieter than the same period of 2015 in terms of snares picked up (22% quieter in fact). In May, DAPU accounted for 5 well-known, different meat poachers - all convicted. At the same time we were able to take 1 x shotgun and 1 x .303 rifle out of circulation.

May to August is always the quietest time of the year in terms of poaching simply because our hunters are out and about, providing excellent coverage of the area. Each hunting party moves with two game scouts/ rangers so those along with trackers, PH's and clients make for a formidable force. DAPU continues to build a more and more of a structured presence every month and has a much wider informer network.

Summary of successes January to August 2016

	No. of snares	Dogs shot	Meat Poachers convicted	Elephant poachers	Traditional Weapons & guns retrieved	Reward s paid	Jail time months
Jan	300	0	3	0	0	US\$821	
Feb	208	0	0	2	0	US\$978	216
March	95	0	0		0	US\$97	
April	137	0	1	0	2	US\$321	6
Total	740	0	4	2	2	US\$2,217	222
May	94	0	5	0	4	US\$1,310	40
June	75	0	0	0	0	US\$83	
July	27	0	0	0	2	US\$67	
August	164	1	0	0	0	US\$254	
Total	360	1	5	0	6	US\$1,714	40
Total Y.T.D.	1100	1	9	2	8	US\$3,931	262

Snare yields 2015 and 2016 compared.



***** It is clear to see the decline during the hunting season and also ... the impending increase as hunting slows down and we head towards Christmas. *****



***** The worst kind – cable snares for buffalo and elephant calves
- Cable taken from a vandalized foreign Aid project***.**



***** A poacher with his duiker*****

Elephant poaching.

Between the 16th and 19th June 2016, one hunting party found two fresh elephant carcasses in Ward 2 and another hunting party found another carcass in the Chico area of the Dande Safari Area. As already mentioned, shortly after that, National Parks in Chewore North had a "contact" with a gang where they accounted for one poacher (dead). Things have been very quiet since that BUT our informers tell us that they were two separate gangs so time will tell!

Kanyemba remains a transit point for ivory out of Mozambique and Zimbabwe into Zambia and onwards to destinations unknown, so from time to time we get information of ivory moving through – normally that ivory originated in Mozambique or other parts of the Zambezi valley.



***** Muno with one of the poached ele's*****

Problem Animal Control.

Duties for DAPU scouts also include attending to Problem Animal reports (PAC).

a. Elephant – There are not many reports – only really along the Kadzi River in the East where elephant bulls tend to enjoy the vegetable gardens along the riverbanks!

b. Lions – Nothing much to report to date. Lots of lions around, and some cattle have been lost BUT no PAC.

c. Buffalo – One man was killed in Kanyemba on the 14th August by a dagga boy and a second person injured by the same bull two weeks prior. The buffalo is still at large.

d. Crocodiles – Nothing to report yet.

e. Snake bites – Nothing to report yet.

f. Hyenas – there are consistent and accurate reports of hyenas killing livestock especially in the East.

"Patrol Kit"

In the previous newsletter we mentioned that we were expecting some boots from the USA. Well they are being shipped in the next week so we will be having some VERY happy scouts by month end!!! Anyone who has done a long walk in inappropriate footwear will know just how vital boots are! In the same shipment we are also receiving handcuffs and water bottles. A huge thank you to Duke McCaa who single handedly organized this!!!

<u>Goals for Second quarter 2016.</u>	<u>Completed?</u>	<u>Goals for third quarter 2016</u>
1. Continue with anti-poaching patrols.	Yes	1. Continue with anti-poaching patrols.
2. Replace scouts that are not performing.	Yes	2. Repair and replace firearms.
3. Early burning will start in May as soon as it is dry enough.	Yes	3. Ramp up patrol effort especially at water.
4. Repair firearms where possible or replace	No	4. Arial surveillance - Flying for Wildlife.
5. New boots.	Yes	

Land cruiser (ABK 7074) re- build.

This has been a big success and has really helped with deployments and rotation of call signs.

Cost savings.

One of our biggest costs is obviously vehicles, which are pretty much irreplaceable. In order to optimize our DAPU vehicle mileage we have had a satellite-tracking unit fitted to AAX 9832, which does the bulk of the Dande North deployments.

We plan to have a unit installed on ABK 7074 when that vehicle next comes to Harare. Obviously these vehicles are used from time to time to deliver groceries or whatever en-route to a deployment! If any of you are interested in specifically sponsoring one of these vehicles we will supply you with the login details and you can track the vehicle live!

Buzz and Myles

DAPU Income and Expenses 2016

First and second quarters.

Income

Safari Club International	US\$8,900.00
National Capital Safari Club	US\$1,500.00
Sylvanus Trust	US\$6,000.00
Clients	US\$28,388.90
CMS	US\$16,119.35
<u>Total Income</u>	<u>US\$60,908.25</u>

Expenses

US\$60,908.25

1 Wages, rewards and rations.

	<u>Scouts</u>	<u>Management Bongi Muno & Alfa</u>	<u>Rations</u>	<u>Rewards</u>	<u>Total</u>
January	US\$1,100	US\$1,605	US\$770	US\$821	US\$4,296
February	US\$1,100	US\$1,605	US\$770	US\$978	US\$4,453
March	US\$1,100	US\$1,605	US\$770	US\$97	US\$3,572
April	US\$1,100	US\$1,605	US\$770	US\$321	US\$3,796
	US\$4,400	US\$6,420	US\$3,080	US\$2,217	US\$16,117
May	US\$1,100	US\$1,605	US\$770	US\$1,310	US\$4,785
June	US\$1,100	US\$1,605	US\$770	US\$83	US\$3,558
July	US\$1,100	US\$1,605	US\$770	US\$87	US\$3,542
August	US\$1,100	US\$1,605	US\$770	US\$254	US\$3,729
	US\$4,400	US\$6,420	US\$3,080	US\$1,714	US\$15,614

2 2016 DAPU equipment expenses

DAPU Ammunition - National Cartridges	US\$362.00
DAPU tents - Mabels Canvas	US\$2,242.50
Uniform downsizing	US\$330.00
Uniforms	US\$1,078.00
Dapu # 1 Toyota Land Cruiser AAX 9832 - Grease Junky	US\$2,230.75
Dapu # 1 Toyota Land Cruiser AAX 9832 - Tineo Enterprises	US\$1,078.00
Dapu # 2 ABK 7074 - Alpine panel beaters	US\$1,437.00
DAPU # 2 ABK 7074 Burj Auto	US\$1,425.00
DAPU # 2 ABK 7074 Grease Junky	US\$3,974.00
DAPU # 2 ABK 7074 Windscreen	US\$60.00
DAPU # 2 ABK 7074 injector pump Garibran services	US\$720.00
	<u>US\$14,937.25</u>

3 Vehicles (2).

Mileage ABM 5149 Jan - April 3400 + 10297 km, s = 13697 x \$.5/ km	US\$6,849
Mileage AAX 9832/ ABK 7074 Jan - April = 8000 + 6783 = 14,783 * .5/km	US\$7,392
	<u>US\$14,240</u>

Total expenses

US\$60,908

Shortfall

US\$0

RCVD DEC 15 2016

DANIEL LONGNA
(b) (6)
STEVENS POINT, WI (b) (6)

(b) (6)

Nov 11, 16
DATE

• PAY TO THE ORDER OF US Fish & Wildlife Service \$ 100.⁰⁰
One hundred DOLLARS



STEVENS POINT, WISCONSIN 54481

Daniel Longna MP

For
(b) (6)

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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

BOARD OF DIRECTORS:
 JOHN J. JACKSON, III, J.D.
 CHRISSIE JACKSON
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 BERT KLINEBURGER
 SHANE MAHONEY

January 10, 2017

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


Re: Applications for Import of Sport-Hunted Lion Trophies from Zambia

Dear Chief Van Norman:

Enclosed please find two applications to import African lion trophies to be hunted in Zambia in 2017. These applicants are hunting with Kwalata Safaris. You received an Operator Enhancement Report from this company on December 13, which demonstrates the company's strong commitment to anti-poaching, habitat protection, community investment, and responsible and sustainable wildlife management. Please consider that report and the other documents submitted by Conservation Force and Zambian authorities and operators in making an enhancement determination for these applications.

Please do not hesitate to contact us if you have questions about these permit applications.

Sincerely,



Regina Lennox

NOTICE OF REPRESENTATION

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

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

I also request that these attorneys be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my 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: jjj@conservationforce.org
E: regina.lennox@conservationforce.org

Signed: _____

Name: _____

Date: _____



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

Federal Fish and Wildlife Permit Application Form

RCVD JAN 13 2017

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

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

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

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

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

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

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

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 06US129596/9 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.	
Signature (_____) of applicant/person responsible for permit (No photocopied or stamped signatures)	
Date of signature (mm/dd/yyyy) 1/4/17	

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
P. l. melanochaita (African lion)
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
Zambia, Lower Lupande Game Management Area, Mfuwe, Eastern Province, Luanga Valley
 - b. Date wildlife is to be hunted:
30 May - 22 June 2017
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
All parts including skin, skull, teeth, and claws
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
N/A
 - b. Date wildlife was hunted:

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

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: MICHAEL BORMAN
Business Name: BANGWEULU TAXIDERMY
Address: 4142K CHIFWEMA ROAD, NEW KASAMA
Address:
City: LUSAKA
State/Province: SOUTHERN
Country, Postal Code: ZAMBIA, 50100

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

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

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

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

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

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

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

Applicant's signature:  Date: 1/4/17

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

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/lc/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):
Applicant at 631-553-0037 or John J. Jackson, III or Regina Lennox of Conservation Force at 504-837-1233, jjw-no2@att.net / 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.

RCVD JAN 13 2017

(b) (6)

(b) (6)

DATE 1/4/17

50-546/214

PAY TO THE
ORDER OF

U S Fish + Wildlife Service

\$ 100.00

One Hundred $\frac{00}{100}$

DOLLARS 100



SUFFOLK COUNTY
NATIONAL BANK
BANK HOLDINGS ARE GUARANTEED
WWW.SCNB.COM

FOR

(b) (6)

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III 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 lawfully hunted African lion trophy.

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

I also request that these attorneys be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my 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: jjj@conservationforce.org
E: regina.lennox@conservationforce.org

Signed: _____

Name: _____

Date: _____



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

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

RCVD JAN 13 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: LA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

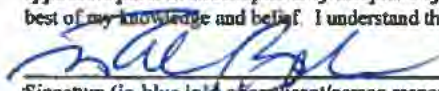
Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

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

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

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

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 738514 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink of applicant/person responsible for permit (No photocopied or stamped signatures)) Date of signature (mm/dd/yyyy) 1/4/17	

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
P. l. melanochaita (African lion)
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
Zambia, Lower Lupande Game Management Area, Mfuwe, Eastern Province, Luanga Valley
 - b. Date wildlife is to be hunted:
30 May - 22 June 2017
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
All parts including skin, skull, teeth, and claws
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
N/A
 - b. Date wildlife was hunted:

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

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: MICHAEL BORMAN
Business Name: BANGWEULU TAXIDERMY
Address: 4142K CHIFWEMA ROAD, NEW KASAMA
Address:
City: LUSAKA
State/Province: SOUTHERN
Country, Postal Code: ZAMBIA, 50100

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

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

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

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

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

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

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

Applicant's signature:  Date: 1/4/17

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

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from www.fishbase.org. If you 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):
Applicant or John J. Jackson, III or Regina Lennox of Conservation Force
504-837-1233, jjw-no2@att.net / 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.



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

Enhancement information in support of PRTs 03367C, 93398B, etc. (Zambia lion and elephant imports)

1 message

Regina A. Lennox <regina.lennox@conservationforce.org>

Tue, Dec 13, 2016 at 12:08 PM

To: "Vannorman, Tim" <tim_vannorman@fws.gov>, darcy_vargas@fws.gov
Cc: "John J. Jackson, III" <jjj@conservationforce.org>

Dear Tim and Darcy,

Attached please find a report from a safari hunting operator in Zambia demonstrating enhancement. You will receive two applications for lion trophy imports from this concession in 2017. We request that you consider this report in making an enhancement finding for those applications, and in making an enhancement finding for the 2016 applications that we previously submitted (Robert Hixson (elephant and lion), Amanda Henson (lion), Stephen Crooks (lion), and Lawrence Rudolph (lion)).

This operator, Kwalata Safari Company, leases a 1,511 km² concession in the "prime" South Luangwa Safari Area. They employ four trackers, ten anti-poaching scouts, and eight camp staff from local villages. The company supports at least 100 dependents in the area, creating a direct link between conservation hunting, the well-being of the wildlife, and the well-being of the local residents.

Kwalata Safari Company maintains and equips two company anti-poaching teams. These teams conduct daily patrols in the concession, and assist the DNPW (and the lion's prey base) by policing the border of South Luangwa National Park. The company provides rations, petrol, and funds as needed for government rangers, to enhance the rangers' capacity in the park. Further, under the company's contract with local communities, the company funds at least six community scouts and supplies rations for them. Last year, these anti-poaching efforts succeeded in picking up over 1,000 snares, 40 gin traps, and two poisoned licks; arresting ten poachers; and confiscating 14 weapons. **The company invested almost \$57,400 in anti-poaching in 2015 alone.** This investment directly protects the lion and its prey base and the critical lion habitat, and therefore benefits the species.

Their community program is equally impressive. The company pledges at least \$15,000 per year to each of two villages. Company and village leaders together decide on the projects and the village co-invests through fund-raising or sweat equity. In 2015, the company contributed \$18,100 in school renovations for one village and \$15,400 for various projects in the second village. The company also distributes at least 50% of game meat harvested to these villages, for the local residents to eat or sell. In 2015, this was valued at \$27,500. Finally, the company maintains a fund of client donations to compensate local residents for losses due to dangerous animals. In 2015, they compensated local villagers over \$2,600. **The company invested over \$63,600 in local communities in 2015 alone.** This investment enhances community tolerance of lion, elephant, and other species, links conservation with improved livelihoods, and reduces human-wildlife conflict. And these benefits have been quantified: in 2015, although the company took 82 reports of problem animals, they did not take a single animal for problem animal control.

Please let us know if you have questions about this information, and please consider it in making enhancement findings for lion and elephant imports from Zambia.

Best wishes,
Regina

Regina A. Lennox

Conservation Force

3240 S I-10 Service Road W, Suite 200

Metairie, Louisiana 70001 USA

[504-837-1233](tel:504-837-1233) (office)

[919-452-8652](tel:919-452-8652) (cell)

regina.lennox@conservationforce.org



KWALATA SAFARIS-REPORT FOR LION CONSERVATION 2016 - 2.docx
1286K

KWALATA SAFARIS, LTD.

Address, 6980 KATANGA ROAD LUSAKA

Operator email: kwalatapeter@yahoo.com

I. DESCRIPTION OF COMPANY AND CONCESSION

Kwalata Safari Company, Ltd. has been operating in Lower Lupande Concession since April 2002. The concession provides habitat for a range of species including buffalo, lion, hippo, kudu, leopard, elephant, impala, bushbuck, hyena, warthog, zebra, giraffe, and waterbuck. Our concession is about 1511 kilometer squared and is in the South Luangwa Safari Area. Lower Lupande is rated under Zambia Government Legislation as one of the Prime Hunting Blocks in Zambia due to the abundance of wild life and cats. We have a lease with the Wildlife Authority for seven years renewable which started in 2015 after the new allocations of hunting blocks in Zambia with the new Government.

The company is a partnership between Peter Chipman and Zaeed Patel and has been operational for more than fourteen years. We employ three professional hunters, four game trackers, ten anti-poaching scouts and eight camp staff (cooks, cleaning, miscellaneous). Altogether our operations support at least 100 dependents in local villages apart from the local employed camp staff and scouts.

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

II. ANTI-POACHING COMPONENT

Kwalata Safari Company maintains two five-man anti-poaching teams at an annual cost of over \$ 25000. Each team is equipped with a four-by-four vehicle, a motorbike, uniforms and boots, tents, rations, and a satellite phone. Our teams closely cooperate with the Wildlife Authority to conduct almost daily patrols of the concession and the border of the South Luangwa National Park. We supply rations at least twice per month to the government game scouts to ensure they are sufficiently equipped for the patrols as well as transport support and more over and above the above mentioned amount per year.

Our contract with the local community requires that part of the revenues paid to the community be used to fund at least six community game scouts, and additionally we supply rations at least twice per month to these scouts.

We heavily patrol our area, conducting approximately one patrol per day by vehicle and foot. In the past year, our teams picked up about 1000 snares, 40 gin traps, and two poisoned licks. Removing snares protects the lion and wildlife population by reducing incidental snaring. Over the past year we arrested more than ten poachers, confiscated three bicycles and five muzzle loaders from them, as well as recovered 14 weapons total. We found two elephant carcasses each having tusks removed, the bones of one impala, some evidence of illegal logging, and a Leopard with a snare wound.

If needed, we subsidize the government game scouts. Every month we provide one week's rations to support a dozen Wildlife Authority scouts and contribute \$ 500 in petrol to the Wildlife Authority.

We also send out road crews approximately every two weeks to check the condition of the roads in the concession, to ensure we are able to patrol effectively.



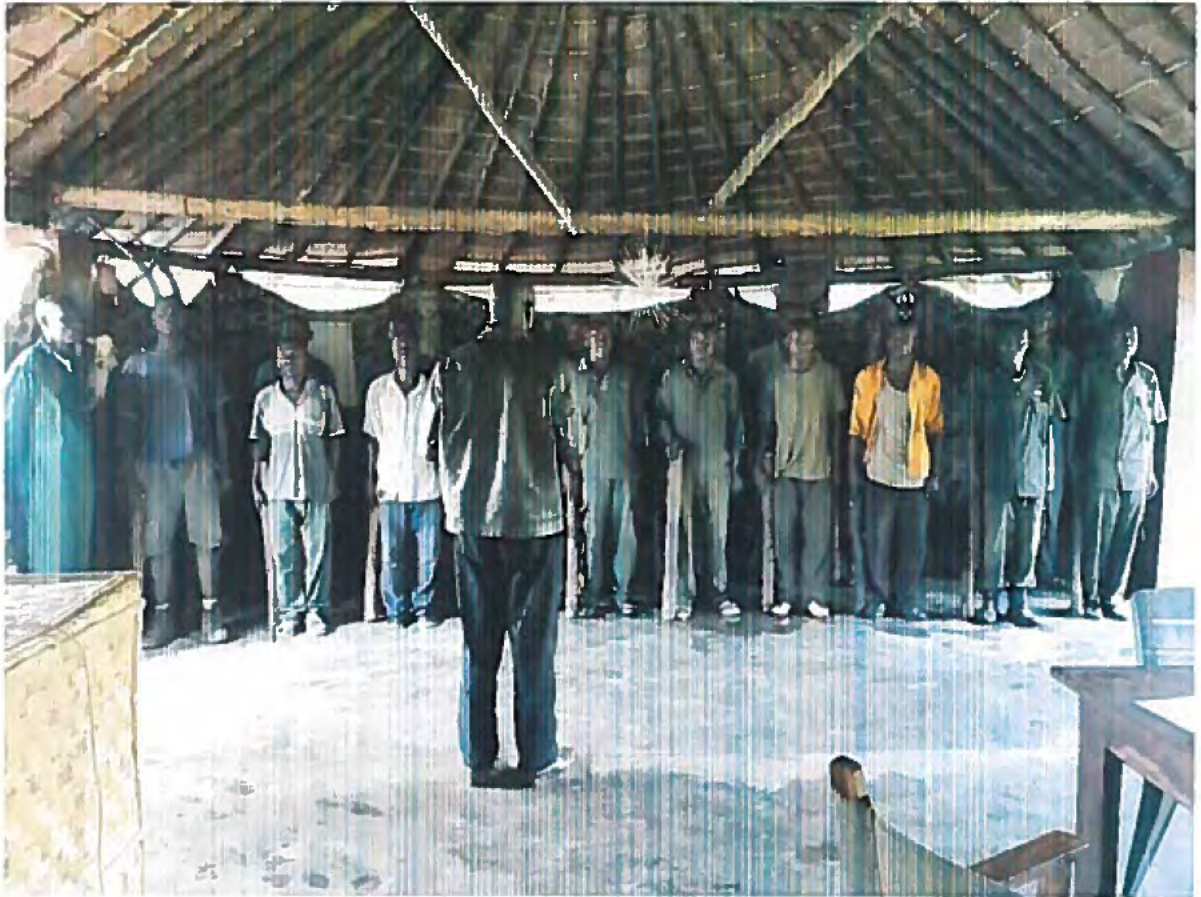
In the picture above wire snares recovered from poachers



In the picture above an elephant which was poached had its tusks removed



In the picture above a Leopard skin recovered from poachers by our vigilant game scouts.



In the picture above our Scouts being prepared to go on Patrols

In 2015 Kwalata Safari Company spent almost \$ 57400 in our blocks on anti-poaching patrols, equipment, and assistance to the Wildlife Authority and community scouts, including by providing 6000 liters of diesel for patrol vehicles. We recorded 363 patrol days and well above 2000 patrol hours. And made over \$ 4200 in payments of rewards. A breakdown of spending on anti-poaching is below.

Item	Spend (USD)	Notes
Scout salaries	18000	Directly paid and some subsidies to WA
Scout equipment	5000	Clothing, vehicles, rations, phones, tents, etc.
Diesel / petrol	7700	For scouts and WA
Rations for WA and community scouts	6500	
Micro light rental and fuel	16000	Including time donated to WA
Rewards	4200	For information and arrests
TOTAL	\$ 57400	

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

III. COMMUNITY PARTICIPATION

A. Community Assistance Component

We make contributions to the two closest villages which are Malama and Kakumbi.

We pledge an annual contribution of at least \$ 15000 in projects to each of two villages. And in return ask for a list of preferred projects of which we develop a work-plan in consultation with village leaders and citizens to fund and supply projects and require a measure of community contribution to each project either through a council donation or more frequently, through donations of time by workers. In 2015 we funded and supplied the following projects at each village's choice:

Village	Projects	Amounts (USD)
---------	----------	---------------

Village 1	Renovations of schools	18100
Village 2	Designing and constructing village office	3100
	Funding youth sports league including transport	1900
	Providing new equipment for village game scouts	800
	Paying teacher salary and school fees for poor children	6100
	Digging new borehole and building pump station	3500
		15400
	TOTAL	\$ 33500

In addition to these direct contributions, we pledge to distribute at least 50% of game meat harvested to the villages. The villages have the choice to eat the meat or sell it. In 2011 the value of this meat was \$ 30000. 2012 the value was \$ 33000. 2015 the value was \$ 27500.

Our concession agreement requires we have a community assistance program/plan and report on the program to the Wildlife Authority. The Wildlife Authority considers these contributions in determining whether to renew our lease.

B. Conflict Control

We also take reports from villagers about problem animals and do our best to keep elephant out of community gardens during harvest. We also maintain an approximately \$ 12000 fund of client donations which we use for community compensation. In 2015 we received 82 reports of problem animals and we made it through the entire season without a problem animal kill. We paid out \$ 2650 in compensation for lost livestock and crops.

IV. HABITAT PROTECTION AND CONSERVATION DEVELOPMENT

We have enhanced water infrastructure for wildlife in our concession by maintaining four pans to increase water supply and carrying capacity of the concession which gives allot of Antelope Species for Lion/Leopard food chain and habitat for their sustainable and healthy survival.

V. OTHER INFORMATION

A. Prey Base

Kwalata Safari Company's anti-poaching efforts, water provision, and fire management have allowed the lion prey base in our concession to grow over the past five years. We estimate that our Buffalo and Plains Game populations have shown an increase of 15-20% per annum. In 2014 our Wildlife Authorities flew over the Game Management Areas in a large-mammal survey and counted more than 1000 buffalo on average.

B. Lion Population Tracking

Lion are notoriously difficult to survey or census. To track the lion population trend in our concession, Kwalata Safari Company maintains a lion sightings record in form of camera pictures taken as well as trail camera pictures, sightings, spoor and footprints on individual, groups and passing through cats. Because we keep tabs on the lion in our concession, we are assured that the regulated, limited off take is sustainable. Our wildlife Authorities have also provided us with a data recording sheet to use on all Lion/Leopard Safaris as off 2015 to take record of sightings and record the activities on the specific safari being done. We have a 100% success on all our hunts.

C. Lion Aging Approach

Kwalata Safari Company has been following an age-based policy for African lion trophies since 2015, when we adopted this Policy after a mutual agreement with our wildlife Authorities and to be conservative in estimating age.

As a result of this, Lions have been passed up by a number of potential Lion before allowing a client to harvest a specimen that we have any doubt is of on age. We also don't allow any client to shoot a lion of which there is any doubt on the age limit if the lion looks anything less than 5 years of age but rather try and shoot a lion that looks more the like of more than 6 years of age.

In 2016, we successfully harvested mature (aged six or older) male lion up to our quota (of two). We have been able to harvest our full quota this year because our selectivity has resulted in more lion reaching an advanced age.

D. ELEPHANT HUNTING

Our Wildlife Authorities have put up a policy not to Harvest any Elephant that has its tusks weighing less than 15 kilograms. In view of this our Professional Hunters are instructed to not harvest an Elephant with weight in tusks of less than 20 kilograms at a minimum and to be very selective when Hunting Elephant by ensuring that they comply with this agreement. The wildlife authorities have put up stringent measures to any Professional Hunter who goes against this rule which may even include withdrawing his Professional Hunting License.

E. U.S. Hunters

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

CONCLUSION

Kwalata Safari Company's regulated, confirm that our sustainable-use based hunting program enhances the survival of the Lion and Elephant and we recognize that the Cat and Elephant hunts bought and booked by our American Clients contribute a higher percentage of income in the Safari Hunting and it is our obligation to share these finances with the communities who have played an important role to conserve this resource. We also realize that these species are a renewable resource and as such we will endeavor to provide suitable conditions for the reproduction and sustainability of these species with the allowance of our American Clients to keep coming and hunting the different species in Africa.

Signed: 

Operator Name:

Kwalata Safaris @ KTA

Title:

DIRECTOR

RCVD JAN 13 2017

(b) (6)

(b) (6)

DATE 1/4/17 50-546/214

PAY TO THE ORDER OF

U.S Fish & Wildlife Service \$ 100.00

One Hundred ⁰⁰/₁₀₀

DOLLARS



SUFFOLK COUNTY
NATIONAL GAME
GOOD RELATIONSHIPS ARE GOOD BUSINESS®
WWW.SCND.COM

[Signature]

FOR

(b) (6)

† 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.
CHRISSE JACKSON
PHILIPPE CHARDONNET, D.V.M.
BERT KLINEBURGER
SHANE MAHONEY

January 16, 2017

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041

RCVD JAN 18 2017 LB

Re: Applications for Import of Sport-Hunted Trophies from Zambia


Dear Chief Van Norman:

Enclosed please find two applications to import African lion, leopard, and elephant trophies to be hunted in Zambia in 2017. These applicants are hunting with Nyamvu and Mopane Safaris and Ivory Safaris. The operator reports from Nyamvu and Mopane Safaris are enclosed, and you previously received an operator enhancement report from Ivory Safaris. These reports demonstrate the companies' strong commitment to anti-poaching, habitat protection, community investment, and responsible and sustainable wildlife management. I also enclose the 2017 enhancement report from Muchinga Adventures, Ltd., with a CD containing its attachments, to update your file on this operator.

Please consider these reports and the other documents submitted by Conservation Force and Zambian authorities and operators in making an enhancement determination for these applications.

Please do not hesitate to contact us if you have questions about these permit applications.

Sincerely,



Regina Lennox

NOTICE OF REPRESENTATION

RCVD JAN 18 2017

LB

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

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

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

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: jjj@conservationforce.org
E: regina.lennox@conservationforce.org

Signed: _____

 (b) (6)

Name: _____

Daniel Welker

Date: _____

01/06/2017



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

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

Federal Fish and Wildlife Permit Application Form

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

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

RCUD JAN 18 2017

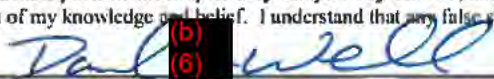
LB

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

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

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

C. All applicants complete address information			
1. a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)			
1. b. City Brookshire	1. c. State Texas	1. d. Zip code/Postal code (b) (6)	1. e. Country 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. Country

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 01/06/2017	

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
P. l. melanochaita (African lion)
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
South Luangwa, Zambia in Nyamvu & West Petauke Game Management Areas, Nyimba being the closest town, operator and lease holders Nyamvu & Mopane Safaris Ltd.
 - b. Date wildlife is to be hunted:
July 22, 2017 - Aug. 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).
All parts including skin, skull, teeth, and claws
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
N/A
 - b. Date wildlife was hunted:
N/A

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

N/A

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

N/A

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

Name: Michael Borman
Business Name: Bangweulu Taxidermy
Address: 4142K Chifwema Road, New Kasama
City: Lusaka
State/Province: Southern
Country, Postal Code: Zambia, 50100

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

Please see the information submitted by Conservation Force and Zambian authorities and operator.

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: 01/06/2017

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

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

DANIEL (b) (6) WELKER 07-14
(b) (6)
BROOKSHIRE, TX (b) (6)

(b) (6)

1-9-17

DATE

Pay to the Order of U.S. Fish + Wildlife Service \$ 100.00
One hundred + $\frac{00}{100}$ DOLLARS



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IR Well

For

(b) (6)

(b) (6)

Notated Check

RCVD JAN 18 2017



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

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

Federal Fish and Wildlife Permit Application Form

RCVD JAN 11 2017

LS

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

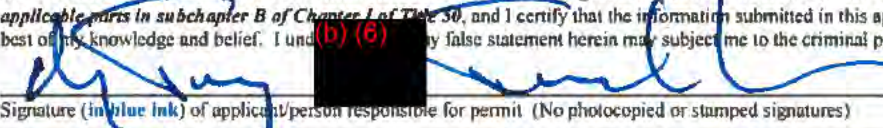
Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES Threatened-listed
(Appendix I of CITES and/or **ESA**) lion

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

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

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

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

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

Please continue to next page

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

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

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

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

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

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

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

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

N/A

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

N/A

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

Name: Michael W. Borman
Business Name: Bangweulu Taxidermy Ltd.
Address: 41421K 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 must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information provided by Conservation Force, Zambian authorities, and Zambian operators.

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

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

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

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

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

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

Applicant's signature:  _____ Date: 1/11/2017

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

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

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

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

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

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

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

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

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

RCVD JAN 18 2017

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(b) (6)



UNITED AMERICAN BANK
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San Mateo, CA 94401
650-579-1500
www.unitedamericanbank.com
90-4355/1211



1/11/2017

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ORDER OF

U.S. Fish and Wildlife Service

\$ **100.00

One Hundred and 00/100*****

DOLLARS

U.S. Fish and Wildlife Service



[Handwritten Signature]
AUTHORIZED SIGNATURE

Security features. Details on back.



MEMO

(b) (6)



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

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

Federal Fish and Wildlife Permit Application Form

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

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

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

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

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

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

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in Instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 15/0000626/MP No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I (b) (6) that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature (in blue ink) of applicant responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 01-25-2017	

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
P.I. melanochaita African Lion
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
Zambia, Mufunta GMA, Western Province, S15°49'028; E025°15'474, Kaoma
 - b. Date wildlife is to be hunted:
06/13/2017-07/07/2017
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
Skull, Skin, Claws
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
N/A
 - b. Date wildlife was hunted:
N/A

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

N/A

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

N/A

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

Name: MVU Safaris
Business Name: MVU Safaris
Address: Plot # 6980 Katanga Road Lusaka
Address: P.O. Box 35225 Lusaka
City: Lusaka
State/Province: Lusaka
Country, Postal Code: Zambia, 1010

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

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

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

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

Taxidermist/Broker's signature: _____ Date: _____

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

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

Applicant's signature:  (b) (6) Date: 01-25-2017

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

JFK

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

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

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

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

David Asa (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 FEB 1 2017

David (b) (6) Asal (b) (6)
(b) (6)

Farmville, VA (b) (6)

DATE 1-25-2017

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

One Hundred & 00/100

DOLLARS Security details on back.

New Horizon Bank

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Powhatan, VA 23139

Founding Shareholder

FOR

WISA WISA

(b) (6)

David M. Asal MP

TO: Division of Management Authority

Branch of Permits MS

Reference Application # MA19855C-0

Total Pages-including cover-6

FROM: David (b) Asal

(b) (6)

Subject: Supporting Documentation

Attached you will find the supporting documentation requested to be submitted in conjunction to my application (MA19855C-0). The attached documentation outlines the total amount of allocated funds and how they were dispersed by Mvu Safaris hunting program. These funds were used to better and improve the habitats as well as grow the Lion/Leopard population. There was also funds allocated for anti-poaching and other community compensations. Please contact me if any further information is needed or requested. Thank you in advance for the consideration.

David (b) Asal

(b) (6)

Farmville, VA (b) (6)

U.S.A.

Item	Amount (USD)	Notes
Scout salaries	14900	Directly paid and some subsidies to WA
Scout equipment	5000	Clothing, vehicles, rations, phones, tents, etc.
Diesel / petrol	7700	For scouts and WA
Rations for WA and community scouts	5500	
Rewards	4800	For information and arrests
TOTAL	\$37900	

The concession agreement has a clause which requires Mvu Safaris to submit Annual reports on the Anti-Poaching Activities and patrols done in each particular year to the Wildlife Authorities. This report will be taken into account in 2021 whether to renew the concession or not.

III. COMMUNITY PARTICIPATION

A. Community Assistance Component

We make contributions to the four closest villages on annual pledges of \$40000

We pledge an annual contribution of at least \$10000 in projects to each of the four villages. The Community Resource Boards provide a list of projects to be undertaken in that particular year. The Community, Mvu Safaris and the Wildlife Authorities agree on which project is priority and then proceed to do the said project in each village.

Village	Project(s)	Amount (USD)
VILLAGE 1	Renovations to an orphanage Facility Donation of Office Equipment and used clothes to the orphanage	10300
VILLAGE 2	Sinking of 8 boreholes with hand pump (MARK II) @ USD 1300 EACH	10400
Village 3	Renovations of Health Posts and Buying Linens	9700
Village 4	Sponsored four (4) Students for Tertiary Education in Wildlife Conservation	8000
	TOTAL	38400

MA 19B55C-0

In addition to these direct contributions, we pledge to distribute at least 60% of game meat harvested to the villages. In 2011 the value of this meat was \$10000. In 2012 the value was \$21000. In 2015 the value was \$21500.

B. Conflict Control

We have very few cases of Human Animal Conflict in this concession and mostly they are not very serious in nature.

IV. HABITAT PROTECTION AND CONSERVATION DEVELOPMENT

We have developed the water infrastructure for the exclusive use of wildlife in our concession. We drilled, operate, and maintain six boreholes and natural pans which costs approximately \$17500 per year to maintain. The increased water supply increases the carrying capacity of the concession and the lion's prey base due to more game residing in the concession by finding water resource which where never there before as the block has no flowing rivers or allot of other water supply.

V. OTHER INFORMATION

A. Prey Base

Mvu Safaris anti-poaching efforts, water provision, and fire management have allowed the lion/leopard prey base in our concession to grow over the past six years with great success. We estimate that our plains game populations have increased by 10% per annum as well as big herds of Sable, Roan, Hartebeest and other species can be found regularly while on safari in the block, other species which were never to be found like Zebra, Wildebeest, Buffalo, Eland and others are also slowly returning to the block.

B. Lion Population Tracking

Lion are notoriously difficult to survey. To study the lion population trend in our concession, MVU Safaris maintains a sophisticated database of lion sightings, tracks, pictures as well as trail camera data. We have been doing this from the time we got our concession in 2011 and have only harvested one Lion because of being very selective in the size of Trophy to be taken.

C. Lion Aging Approach

Like other Safari Companies we have been following an age-based policy for African lion trophies since 2015, after adopting a mutual aging agreement with our wildlife Authorities, and to be conservative in estimating age.

As a result we often pass a number of potential lion before allowing a client to harvest a specimen. Sometimes we do not shoot a lion at all because of our selectiveness.

In 2016, we did not harvested a lion up due to our selectiveness on age and maturity but will be hunting a lion in 2017 on our allocated quota (of one). We have been able to harvest our full quota every year when we decided and agreed to harvest a lion because our selectivity in allowing more lion to reach an advanced and mature age.

MA198550-0

D. 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

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

Signed: _____

Operator Name: _____ MUHAMMAD SAEED ESSA

Title: _____ DIRECTOR _____

MA 19855C-0

MVU SAFARIS, LTD.
Address, 6980 KATANGA ROAD LUSAKA
Operator email: m1saeed@hotmail.com

I. DESCRIPTION OF COMPANY AND CONCESSION

Mvu Safaris, Ltd. has been operating in Mufunta Concession since APRIL 2011. The concession provides habitat for a range of species including lion, kudu, leopard, roan antelope, sable antelope and Lichtenstein's hartebeest. The concession is on the Western Boundary of the Kafue National Park of which we hold a lease with the Wildlife Authority for Ten years renewable.

Our company is a Limited Company whose Director are Mr. Mohammed Saeed Essa and Mr. Gulam Adam Patel. The Company has been operating in this country for 6 years. We employ one professional hunter, one camp manager, four game trackers, eighteen anti-poaching scouts, and six camp staff (cooks, cleaning, miscellaneous). Altogether our operations support at least 152 dependents in local villages.

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

II. ANTI-POACHING COMPONENT

Mvu Safaris maintains six groups of anti-poaching teams. Each team consists of three men per team and is equipped with a 4x4 Land cruiser, uniforms and boots, tents, rations, and a satellite phone. The patrols are done in conjunction with the Wildlife Scouts. We supply rations at least twice per month to both the government game scouts and our village scouts to ensure they are sufficiently equipped for the patrols.

The agreement between the Community Resource Board (CRBs) and Mvu Safaris requires that part of the revenues paid to the CRB be used to fund about ten community game scouts, and additionally we supply rations at least twice per month to these scouts.

Poachers find it difficult to conduct illegal hunting activities because we have built several Scout camps around our Game Management Area with scouts stationed at each camp who are equipped with full time radio communications in case of any Emergency. In the past six year, our teams picked up about 9300 snares, 840 gin traps, and 88 poisoned licks.

Our Anti-Poaching activities have helped to grow the Lion/Leopard population as these schemes used by poachers are reduced on a daily basis and we hope to even reduce it further so that we can improve on the wildlife populations including Lion/Leopard population even more.

In 2015, Mvu Safaris spent almost \$37900 in Mufunta on anti-poaching patrols, equipment, and assistance to the Wildlife Authority and community scouts, including by providing 800 liters of diesel for patrol vehicles. We recorded 340 patrol days and well above 2000 patrol hours. We also made over \$4800 in payments of rewards to leads helping in the abduction of poachers. A breakdown of spending on anti-poaching is below.

MA 19855C-0

† 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.
CHRISSE JACKSON
PHILIPPE CHARDONNET, D.V.M.
BERT KLINEBURGER
SHANE MAHONEY

January 26, 2017

RCVD FEB 1 2017

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 three permit applications:

- One application to import an African lion trophy hunted in South Africa in 2016. As shown in the attached letter from the Eastern Cape Province and 2010 Management Plan for the property, the lion population from which this trophy was harvested "conform[s] to a Wild-managed Population." Therefore, this application should be approved pursuant to the October 19, 2016 Enhancement Finding for Wild and Wild-Managed Lions Taken as Sport-Hunted Trophies in South Africa.
- One application to import a lion trophy to be hunted in Zambia in 2017. This applicant is hunting with Muchinga Adventures. I emailed you their enhancement report and previously FedExed a CD with the supporting attachments. As it and the other information previously submitted by Conservation Force, Zambian authorities, et al. demonstrates, Zambia's management program for the African lion, in which licensed, regulated hunting plays a key role, enhances the survival of the species in the wild.
- One application to import a lion trophy and one application to import one elephant and one leopard trophy to be hunted in Zambia in 2017. This applicant is hunting with Ivory Safaris, and you previously received an operator enhancement report from this company. Again, the information submitted demonstrates that licensed, regulated hunting enhances the survival of these species in Zambia.
- One application to import two African elephant trophies hunted in a CAMPFIRE area in Zimbabwe in 2016. As the information previously submitted by Conservation Force, the Zimbabwe Parks and Wildlife Management Authority, professional hunters and operators' associations, the CAMPFIRE Association, and others demonstrates, licensed, regulated hunting is crucial to the management and conservation of the elephant.

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

Sincerely,


Regina Lennox

NOTICE OF REPRESENTATION

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

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

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

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

Signed: Stephen (b) (6) Crooks
Name: STEPHEN (b) (6) Crooks
Date: 4/18/16



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

Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

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

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

Importation
listed
trophy

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

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

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

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 14US99433A/9 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature (in blue/ink) of applicant/person responsible for permit (No photocopied or stamped signatures) <u>Stephen Crooks</u> Date of signature (mm/dd/yyyy) <u>01/18/2017</u>	

Please continue to next page

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

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

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

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

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

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

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

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: Muchinga Adventures Ltd.
Business Name: P.O. Box 390003
Address: Lumumba Road
Address: Lusaka
City: Zambia
State/Province:
Country, Postal Code:

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

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

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

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

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

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

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

Applicant's signature: Stephen Crooks Date: 01/10/2017

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

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

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.

PLEASE CONTACT APPLICANT FOR
CREDIT CARD INFORMATION

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, 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.

RCVD FEB 1 2017

DOCUMENT INCLUDES CHEMICAL REACTIVE PROPERTIES AND TREATMENT SAFETY INFORMATION

STEPHEN (b) (6) CROOKS 01-02 74-1001/724 (b) (6)

STANTON, MI (b) (6) DATE Jan 18, 2017

PAY TO THE ORDER OF USFWS \$ 100.00

One hundred and 00/100 DOLLARS

CHEMICAL BANK.
ChemicalBankMI.com

MEMO (b) (6)

Blue Creek

† 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.
CHRISSE JACKSON
PHILIPPE CHARDONNET, D.V.M.
BERT KLINEBURGER
SHANE MAHONEY

January 26, 2017

RCVD FEB 1 2017

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041

Re: Applications for Import of Sport-Hunted Trophies

Dear Chief Van Norman,

Enclosed please find three permit applications:

- One application to import an African lion trophy hunted in South Africa in 2016. As shown in the attached letter from the Eastern Cape Province and 2010 Management Plan for the property, the lion population from which this trophy was harvested "conform[s] to a Wild-managed Population." Therefore, this application should be approved pursuant to the October 19, 2016 Enhancement Finding for Wild and Wild-Managed Lions Taken as Sport-Hunted Trophies in South Africa.
- One application to import a lion trophy to be hunted in Zambia in 2017. This applicant is hunting with Muchinga Adventures. I emailed you their enhancement report and previously FedExed a CD with the supporting attachments. As it and the other information previously submitted by Conservation Force, Zambian authorities, et al. demonstrates, Zambia's management program for the African lion, in which licensed, regulated hunting plays a key role, enhances the survival of the species in the wild.
- One application to import a lion trophy and one application to import one elephant and one leopard trophy to be hunted in Zambia in 2017. This applicant is hunting with Ivory Safaris, and you previously received an operator enhancement report from this company. Again, the information submitted demonstrates that licensed, regulated hunting enhances the survival of these species in Zambia.
- One application to import two African elephant trophies hunted in a CAMPFIRE area in Zimbabwe in 2016. As the information previously submitted by Conservation Force, the Zimbabwe Parks and Wildlife Management Authority, professional hunters and operators' associations, the CAMPFIRE Association, and others demonstrates, licensed, regulated hunting is crucial to the management and conservation of the elephant.

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

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 one permit to import a lawfully hunted African lion trophy and one permit to import a lawfully hunted African leopard 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 trophies at the following address:

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

Signed: John (b) (6) Wilson
Name: John (b) (6) Wilson
Date: 1-10-17



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

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

Federal Fish and Wildlife Permit Application Form

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

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

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

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

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

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

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.	
Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) <i>John Wilson</i> (b) (6)	Date of signature (mm/dd/yyyy) 1-10-17

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
P. I. melanochaita (African lion)
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
Zambia, Chikwa Hunting Block, Luangwa Valley, Eastern Province -- nearest town is Lundazi
 - b. Date wildlife is to be hunted:
August / 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).
All parts including skin, skull, teeth, and claws
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
N/A
 - b. Date wildlife was hunted:
N/A

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

N/A

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

N/A

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

Name: Michael W. Borman
Business Name: Bangweulu Taxidermy Ltd.
Address: 41421K 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 must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information provided by Conservation Force, Zambian authorities, and Zambian operators.

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

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

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

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

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

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

Applicant's signature:  (b) (6) Date: 1-10-17

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

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

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

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

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

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

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

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

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

RCVD FEB 1 2017

JOHN (b) (6) WILSON

(b) (6)

(b) (6)

PARKVILLE, MO (b) (6)

1-10-17

Date

Pay to U.S. Fish + Wildlife Service

\$ 100⁰⁰

One hundred + ⁰⁰/₁₀₀

U.S. TRUST

Bank of America, N.A.

ACH R/T 081000032

Processing fee

John

(b) (6)

Wilson

(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 one permit to import a lawfully hunted African lion trophy and one permit to import a lawfully hunted African leopard trophy.

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

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

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

Signed:  (b) (6) 

Name: MARK (b) (6) PEASE

Date: 24 January 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

RCUD MAR 07 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 Threatened-listed
(Appendix I of CITES and/or **ESA**) lion

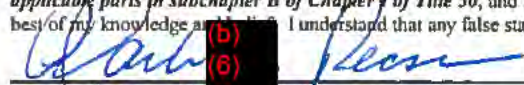
MAR - 7 2017

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

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

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

C. All applicants complete address information				
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) 59 So. Benton Woods				
1.b. City Woodlands	1.c. State Texas	1.d. Zip code/Postal code: 77382	1.e. County/Province Montgomery	1.f. Country USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) same as above				
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 1545756488/9 No <input type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 1/24/2017

Please continue to next page

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

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

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

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

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

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

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

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

N/A

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

N/A

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

Name: Muchinga Adventures Ltd.
Business Name: P.O. Box 390003
Address: Lumumba Road
Address: Lusaka
City: Zambia
State/Province:
Country, Postal Code:

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

Please see information provided by Conservation Force, Zambian authorities and operators, and others.

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

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

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

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

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

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

Applicant's signature:  _____ Date: 1/24/2017

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

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

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

same as page one

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

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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.

MUCHINGA ADVENTURES, LTD.

PO BOX 390003, LUMUMBA RD, LUSAKA ZAMBIA – CHIFUNDA GMA
JOHN AND LAURA DU PLOOY – icrserviceszambia@gmail.com or
info@muchingahuntingsafaris.com

DECEMBER 2016

I. DESCRIPTION OF COMPANY AND CONCESSION

Muchinga Adventures Ltd (the company) has been operating in Chifunda GMA since March 2015. The concession is 4900 square kilometres in size and provides a habitat for baboon, buffalo, chobe bushbuck, common duiker, crocodile, grysbok, hippo, hyaena, cookson wildeebst, zebra, kudu, impala, puku, wild dog, elephant, leopard, lion and various other plains game and carnivore species. The concession is in the north Luangwa and has 70km of river frontage with the North Luangwa National Park. The area is a natural buffer zone for the national park where Frankfurt Zoological Society operates and protects the rhino. The lease is issued in partnership with the Chifunda GMA community, known as the Chifunda Community Resource Board, and the Zambia Wildlife Authority (ZAWA), now the newly named Department of National Parks and Wildlife (DNPW). This is our third lease agreement with ZAWA/DNPW, having operated in the adjacent concessions - Chanjuzi GMA and Nyaminga GMA from 2003 to 2012.

Muchinga Adventures Ltd was formed in 1993 and is a family owned and operated business. The du Plooy family have been in Zambia since the 1880's. The company is responsible for the full time employment of four full time professional hunters and several part time professional hunters, forty five camp staff members embracing trackers, skimmers, cooks, waiters and general workers. Our operations support forty scouts and a further one hundred and thirty people gain employment through jobs that cover the airstrip, opening roads, creating fire breaks, infrastructure development and annual camp building. There are 2143 families in the Game Management Area with more than 7,000 children, many of whom have lost one or both parents. Our employment significantly contributes to the support of the rural community and supports more than seven hundred dependents.

As part of the Muchinga Adventures lease proposal there is a written concession plan that covers community and anti poaching responsibilities, Muchinga Adventures Ltd always exceed these commitments.

II. ANTI-POACHING

Muchinga Adventures Ltd is committed to a financial obligation each year towards law enforcement. Food rations have been supplied covering corn meal, cooking oil, fish, beans, sugar and salt. This allows for a further six patrols a month to be conducted in the Game Management Area. Each team is equipped with uniforms, boots and food rations. The company is committed to providing 210 litres of fuel per month to assist with resource monitoring of the wildlife, movement of the fishermen and spot checks at water sources throughout the Game Management Area. John du Plooy, the managing Director of Muchinga Adventures Ltd, is a senior honorary wildlife police officer and works closely with the Park

Ranger to monitor the activities in the concession. John is based in the concession for six months each year, with daily movements through the GMA monitoring unusual activity.

Frankfurt Zoological Society (FZS) already have a presence in the region due to the rhino project in the national park. Muchinga Adventures works closely with the DNPW, the community and FZS. Rather than doubling up on what FZS are doing they are invited to attend community meetings at the start of each safari season to discuss the next twelve months.

Last year it was identified that the scout's living conditions were not at a satisfactory level, this was creating hardship especially in the rainy season and resulting in a loss of skilled labour to the area. Muchinga Adventures provided roofs to forty houses for the scouts in the Game Management Area. This provided local employment to the community through labour as well as improving conditions to the scouts and their families.

In 2015 the anti poaching efforts resulted in 94 wire snares, 28 muzzle loading firearms and 7 home made shotguns being seized. Two wounded elephant were found dead with ivory removed, two lions were snared (one male and one female in two different locations), The human animal conflict is probably the biggest concern, with a child killed by a leopard in 2015. Almost annually people are being mauled or killed by lion, elephant and buffalo. Elephant and buffalo are constantly destroying crops, tolerance to this is due only to the revenue being received by the community through safari hunting. The joint and consistently intense effort by DNPW, the community, Frankfurt Zoological Society and Muchinga Adventures Ltd is keeping poaching to a minimum in this game management area.

The community benefit financially from the revenue of the hunting with a share in the funds raised. They get 50% of the trophy fee and 20% of the concession fee. This is in addition to other commitments from the company. The community fund the employment for up to thirty village scouts from this revenue. With the agreement of the community areas have been zoned for fishing to limit movement, disturbance to the habitat and encroachment in the concession. Muchinga Adventures endeavor to drive each road in the area every week to ensure that it is maintained and passable for anti poaching efforts. Abnormal activity is reported to the scouts for further investigations. Fire breaks are maintained to protect the habitat for the wildlife and for the safety of the scouts who may be on foot patrols. Anti poaching patrols are done 365 days of the year in Chifunda GMA.

Our anti poaching and conservation commitment both in 2016 and for 2017 covers:

1. Food rations to increase the six full patrols each month
2. Fresh meat as a protein source to the scouts
3. Fuel for resource monitoring
4. Money to conduct village sweeps
5. Rewards for information leading to the arrest and conviction of poachers
6. Rewards for the handing in or seizure of illegal firearms
7. Rewards for the handing in of snares to remove them from circulation

2015 SUMMARY OF ANTI POACHING FINANCES IN CHIFUNDA GMA

Item	Spend (USD)	Notes
Community revenue	48,000	Hunting revenue used for scout salaries
Food rations	8,000	Increases patrols by six per month

Diesel / petrol	12,000	Resource monitoring and anti poaching
Rewards	5,000	Between snares, illegal firearms and information
Infrastructure development, fire management and road maintenance	15,000	Includes employment
TOTAL	\$88,000	

2016 SUMMARY OF ANTI POACHING FINANCES IN CHIFUNDA GMA

Item	Spend (USD)	Notes
Community revenue	48,000	Hunting revenue used for scout salaries
Food rations/ Anti poaching funds	8,000	Increases patrols by six per month
Diesel / petrol	13,500	Resource monitoring and anti poaching
Rewards	7,000	Between snares, illegal firearms and information
Infrastructure development, fire management and road maintenance	14,000	Includes employment
TOTAL	\$90,500	

Muchinga Adventures Ltd is annually reviewed by DNPW and any prospects of a future lease agreement are contingent on our current performance in wildlife protection and community obligations.

III. COMMUNITY PARTICIPATION

A. Community Assistance Component

The concession has approximately 15,000 people resident in the block. There are seven VAGS with five main villages in the concession. Each VAG has its own headman and the concession falls under the jurisdiction of HRH Chief Chifunda. The Community Resource Board are elected to handle the decisions for the Game Management Area residents. They directly receive 20% of the concession fee and 50% of the Government trophy fees.

Muchinga Adventures Ltd are obligated to a US\$20,500 annual payment for the community to use in projects of their choosing. The emphasis being on community welfare, wildlife conservation, education and medical care.

In addition to this Muchinga Adventures Ltd has committed to developing a business for the community. They have a community camp that is based at the crossing from North Luangwa National Park which is ideal for any travellers crossing from Mpika to Chama or Lundazi. The commitment is to rebuild the bush camp to an international standard, provide training of the camp staff and management so that they can realize a long term and sustainable financial return. US\$5000 was given to the community to refurbish parts of the camp and their business has increased more than 300% in 2016.

There are projects/ assistance that are on going and are extra to our obligations and these are:

1. Toilets at the clinic (2016)

2. The employment of a teacher – salary for 12 months (2016)
3. A scholarship for a deserving academic achieving student or adult in the field of education, medical care/medicine or wildlife/environmental conservation – awarded to Mr Chilembo from the Chifunda GMA community for an undergraduate degree in wildlife (2016)
4. Paid for the community meeting twice a year, this builds bridges and trust with the community who are involved in decisions that affect them directly. This includes Muchinga Adventures reporting the monies paid through hunting which they directly benefit from and to allow for financial transparency to all community members.
5. Employment of a liaison officer to help with communications between DNPW, the community and our company

More than 50% of the edible meat harvested is delivered to the community through the hunting season.

Muchinga Adventures Ltd is providing assistance with the community in their application for secondary school classrooms. The closest secondary school is more than 50km from the village and therefore most children do not receive education beyond grade 7.

Muchinga Adventures Ltd relationship with DNPW and the community is a collaborative one based on respect for our partners in the industry. DNPW determines whether to allow a future lease based on the performance of the company in the current lease, Muchinga Adventures Ltd are monitored by an annual review.

B. Conflict Control

The Managing Director is a Senior Honorary wildlife Police Officer, he is in a position to provide assistance whenever required on the ground. Control and putting down of the problem animals is done by National Parks and Wildlife. Reports of wounded animals sighted are done by radio, which all parties have. The community use fireworks bangers and loud noises to chase the animals from their fields. Education of the community members is done through discussions at the community meetings to disperse to each village member. Understanding the financial contribution by hunting and in that each community member benefits on a rotation basis of the fresh meat harvested has significantly led to increased tolerance of the wildlife. In 2016 the company paid for the funeral of a village member killed by a buffalo that had been wounded by lions. The company also paid compensation to farmers who lost livestock to a leopard with cubs, this resulted in the leopard not being controlled as a problem animal as allowed under the Wildlife Act.

IV. HABITAT PROTECTION AND CONSERVATION DEVELOPMENT

During hunting herd disturbance of the buffalo is kept to a minimum to encourage breeding and to encourage the lion not to look for alternate food sources close to the villages.

Fires are controlled and done with the community and the wildlife department to ensure that habitats are conserved so as not to put pressure on the wildlife during the dry season. Fire breaks are maintained, movement of people in the GMA is strictly monitored for a number of reasons including the prevention of unplanned fires.

There is no logging or mining in this concession. The community have chosen not to explore the revenue options of these industries whilst they have the hunting revenue.

The community have committed to not increasing the number of fields they have, thereby preventing further loss of habitat for the wildlife.

V. OTHER INFORMATION

A. Prev Base

In our former hunting block over a period of ten years we more than doubled the buffalo numbers to 700 strong in a single herd through anti poaching and hunting off take controls. We are using this same method and approach in Chifunda. Extra incentives to the scouts for removing illegal firearms and snares have been introduced. Buffalo are the largest food source for the lion and there are an estimated 4000 buffalo in Chifunda.

B. Lion Population Tracking

Lion are notoriously difficult to survey or census. To track the lion population trend in our concession we are bringing in the use of trail cameras, GPS units and sightings of the lion, spoor and footprints recorded by ZAWA, ourselves and the community. Conflict situations will also be studied in order to find solutions that help reduce these.

C. Lion Aging Approach

Our company was involved in the lion aging project by Dr Paula White from when it was started and we are constantly involved in educating our professional hunters in identifying age appropriate lion. Our company policy is to not harvest a lion below the age of 6 years old and to have a conservative visual attitude towards the aging of the lion. This is in the employment contract of each professional hunter. No pride lions will be harvested so as to reduce the incidents of cub mortality and disruption to the population of lion. We are committed to attending workshops to help with lion aging, constant education of our employees and contributing to scientific research of lion.

We have had clients that have seen lion but not taken one due to being selective. We have voluntarily reduced our lion quotas when we feel that this has been required even when we were allowed more lion on quota. In one of our hunting blocks, Tondwa GMA, we removed lion, leopard, buffalo, hippo, waterbuck and hartebeest from the quota as it was felt that hunting these would be detrimental to these species. Our company has a responsible attitude to stewardship, conservation and wildlife management.

In Chifunda GMA trail cameras were used to collect data on both lion and leopard during 2016. The initial quota was one lion for 2016. All data and biological samples for the lion were submitted to Department of National Parks and Wildlife. A second lion on quota was allocated after data was examined by DNPW and determined to be of six years or older. The extra lion allocation was based on scientific data with the size of the Chifunda being 4900 square kilometres. The Trophy Hunting of African Lions: Scale, Current Management Practices and Factors Undermining Sustainability (Lindsey) supports a lion harvest rate that does not exceed 0.5 lion per 1000km. in accordance with this widely cited study Chifunda GMA can sustain an off take of two lions annually.

D. Lion Hunting Revenue

Lion and elephant are our highest-value species. Revenue from these is expected to be more than 50% of our income. This will significantly help us in being able to meet our obligations to the community, to the anti poaching projects and to the protection of these species and their habitat. In our concession proposal we committed to the second highest financial hunting commitment in Zambia to our partners. We believe in a partnership where the community, the wildlife authority, the country and the wildlife all need to benefit from the relationship in a sustainable manner.

E. U.S. Hunters

Most of our clients (75%) are from the United States. These hunters have a conservation ethic and usually contribute above their fees to anti-poaching and our community projects. They are members of associations that expect and support ethical hunting practices. They support our conservative approach to the hunting of lion. US hunters being allowed to import Zambian lion into USA will significantly benefit and contribute to the welfare and long term sustainability of the lion species in Zambia.

CONCLUSION

Muchinga Adventures Ltd is committed to the long term, sustainable and ethical practice of hunting lion. Our involvement in this practice allows us to improve the habitat of the lion, improving the attitude of the community in tolerance towards lion. Our anti poaching practices protect and enhance the lion in the concession, growing their numbers of prey and reducing down snare encounters. The community see a real benefit from partnering in the hunting industry, we answer to them and the Wildlife Authority for our performance towards anti poaching and community obligations. Their involvement and recognition of the value of hunting has made them want to protect their wildlife and be pro active in reducing animal – human conflicts.

Without hunting and the revenue that is earned from the harvesting of the animals the community will turn the land into farming land, removing habitat and kill or poison the wildlife. Poverty and malnutrition are very real problems in rural Zambia. Without a value to the community the wildlife will be the losers as people try to find a way to feed their families.

We believe that lion hunting is a crucial and necessary part of conserving the whole of Chifunda GMA.

Signed: _____

John du Plooy

Operator Name: MUCHINGA ADVENTURES LTD

Title: MANAGING DIRECTOR

ATTACHMENTS

No.	Title	Time Period
1	Map of concession	
2	Company annual reports to the Wildlife Authority	2015
3	Company concession, anti-poaching, community assistance, or other written plan(s) This is the proposal put forward in our bid	2015 - 2022
4	Annual report for Chifunda GMA to Wildlife Department	2015
6	Food rations to scouts	2015
7	Supportive letters/acknowledgements from village or district leaders	2015
8	Meetings with village/district leaders - their participation in deciding how to use donations or contributions from hunting	2015
10	Supportive letters/acknowledgements	2015
11	Company Lion Aging Policy	2015
13	Photographs of anti-poaching patrols, snares, etc.	2015
14	Photographs of community projects and game meat distributions	2015
15	Photographs of habitat enhancement	2015
16	Company annual report to the Wildlife Authority	2016
17	Support to the scouts and anti poaching in 2016	2016
18	Trail camera photos of lion in Chifunda 2016	2016
19	Scholarship for tertiary education for Chifunda GMA	2016
20	Financial breakdown of Chifunda in 2016. This increase was the addition of lion and elephant to the quota	2016
21	Payment of a school teacher for the community	2016
22	Employment 2016	2016

23	Meetings with the village/district leaders – their participation in deciding how to use donations or contributions from hunting	2016
24	Supportive letters/ acknowledgement	2016
25	Chifunda end of year Annual report	2016
26	Community support	2016
27	Education	2016
28	Employment	2016
29	Community Letter to Minister of Arts and Tourism	2016
30	Community Letter to President	2016
31	Lion and leopard submission to DNPW	2016
32	Lion trail camera	2016
33	Meat distribution	2016
34	Meetings in community	2016
35	Otmar lion data	2016
36	Chebanenko lion data	2016
37	Payments	2016

32-81 264
1110

M. PEASE 03 07
THE WOODLANDS, TX

DATE 24 Jan 2017

PAY TO THE ORDER OF *US Fish and Wildlife Service* \$100⁰⁰
One hundred & no/100

DOLLARS

CHASE

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

MEMO

Lion Permit

[Signature]

MP

MAR - 7 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:
JOHN J. JACKSON, III, J.D.
CHRISSE JACKSON
PHILIPPE CHARDONNET, D.V.M.
BERT KLINEBURGER
SHANE MAHONEY

March 7, 2017

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 9 2017

Re: Applications for Import of a Sport-Hunted Lion Trophy

Dear Chief Van Norman:

Enclosed please find one application to import a sport-hunted lion trophy from Buby Valley Conservancy (BVC) in Zimbabwe. In making an enhancement finding for lion trophy imports from Zimbabwe, please refer to the hundreds of pages of enhancement information Conservation Force previously submitted, in addition to the information submitted by the Zimbabwe Parks and Wildlife Management Authority, Zimbabwean safari operators, BVC and Save Valley Conservancy representatives, and others. All of this evidence demonstrates that Zimbabwe's lion management program is science-based, sustainable, and enhances the survival of the species.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,



Regina Lennox


NOTICE OF REPRESENTATION

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

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: jjj@conservationforce.org
E: regina.lennox@conservationforce.org

Signed:  (b) (6) Dagel

Name: Jon (b) (6) Dagel

Date: 2-20-2017



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

RCVD MAR 9 2017

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

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

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

A. Complete if applying as an individual			
1.a. Last name Dagel	1.b. First name Jon	1.c. Middle name or initial (b) (6)	1.d. Suffix Mr
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions) (b) (6)
6.a. Telephone number (b) (6)	6.b. Alternate telephone number (b) (6)	6.c. Fax number (b) (6)	6.d. E-mail address (b) (6) .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 Florence	1.c. State So Dak	1.d. Zip code/Postal code: (b) (6)	1.e. Country USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)			
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. Country

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA08880C-0 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) Jon (b) (6) Dagel 2-20-2017	

Please continue to next page

it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/bv-form-number/index.html>) and return your original permit with that form.

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

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

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

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

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
P. l. melanochaita (African lion)
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
Zimbabwe, Buby Valley Conservancy
 - b. Date wildlife is to be hunted:
April - 9 - 2017 — April 28 - 2017
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
All parts including skin, skull, teeth, and claws
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
N/A
 - b. Date wildlife was hunted:
N/A

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

N/A

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

N/A

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

Name:

Business Name:

Address:

Address:

City:

State/Province:

Country, Postal Code:

Mazungu Safari
8 Norfolk Rd
Hillside
Bulawayo
Zimbabwe

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

Please see the information provided by Conservation Force, BVC and SVC conservancies, and Zimbabwe authorities and hunting operators. CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

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

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

Taxidermist/Broker's signature: _____ Date: _____

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

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

Applicant's signature: _____ Date: 2-20-2017

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

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

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):

NA

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

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

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

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

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

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

RCVD MAR 9 2017

JON DAGEL

78-8587914

(b) (6)

(b) (6)

FLORENCE, SD (b) (6)

02-20-17

Date

Pay to the
Order of

U.S. Fish and Wildlife Service \$ 100⁰⁰

One hundred dollars and no/100

Dollars



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For

See

Stephen Lukonen

MP

(b) (6)



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

Federal Fish and Wildlife Permit Application Form

RCVD MAR 27 2017

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

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

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

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

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

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in Instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: DO NOT HAVE NUMBER No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Kent Greenawalt Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)	
MARCH 20 2017 Date of signature (mm/dd/yyyy)	

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:

- a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Genus: *Panthera Leo* Species: *Panthera*

- b. Sex (if known).

Has to be male

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

- a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

ZAMBIA - CITY IS KASEMPA GPS 14°04'30.13"S
Kasonso-Busanga GMA 25°47'24.36"E

- b. Date wildlife is to be hunted:

July 26 - Aug. 18

- 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):

- b. Date wildlife was hunted:

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

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

Zambia

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

Name: MIKE BORMAN
Business Name: BANGWEULU TAXIDERMIST
Address: CHIFWEMA RD
Address: LLUSAKA
City: LLUSAKA
State/Province: CELL +260 977 771 332
Country, Postal Code:

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

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

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

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

Taxidermist/Broker's signature: _____ Date: _____

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

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

Applicant's signature: [Signature] Date: MARCH 20, 2017

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

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

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

Kent GREENAWALT

(b) (6)

Roanoke, VA.

(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):

Kent GREENAWALT

(b) (6)

(b) (6)

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

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

RCVD MAR 27 2017

KENT (b) GREENHAWAL (b) (6)
(b) (6)
ROANOKE, VA (b) (6)

COMMAND ASSET PROGRAM

(b) (6)

MARCH 21, 2017
Date

Pay to the Order of U.S. Fish and Wildlife Service \$ 100.00
One hundred dollars and NO/100 Dollars



payable through
Wells Fargo Bank, N.A.

For Processing fee

Kent Greenhawalt
AP

(b) (6)

NOTICE OF REPRESENTATION

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


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

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

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

Signed: _____

Name: _____


Thomas (b)
(6) Zulim

Date: _____

March 27, 2017

March 27, 2017

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

RECD APR 05 2017 LB

RE: Federal Fish and Wildlife Permit Application Form 3-200-20
Permittee Thomas Michael Zulim
African Lion – ESA-Threatened-Listed

Dear Sir or Madam:

Accompanying this cover letter is my application for the above referenced African lion import permit for the 2017 hunting season. As you will note in the application, in view of the current US import permit situation regarding African lions, I am not able to specify an exact hunt date or area for a lion hunt in Zimbabwe because I am unable to book a lion hunt for the 2017 hunting season until such time that I actually receive an Africa lion import permit. To do otherwise (i.e., book a lion hunt before obtaining a permit), will put a significant amount of up-front money (i.e., significant cash deposits and such required in advance to book such hunts) at risk of being forfeited and permanently lost.

Booking an African lion hunt will therefore depend on whether I receive a lion import permit and when such permit is received for the 2017 hunting season. The receipt of a permit will determine when and where the lion hunt will take place. Notwithstanding, what I do state in my application is that if such permit is timely received for the 2017 hunting season, the lion hunt would take place at some time during the period August through December 2017, inclusive, and in one of two specific noted areas in Zimbabwe, depending on; (i) when the permit is received, (ii) the then-current availability of hunting dates for the available hunting area(s), and (iii) the then-current availability of a Zimbabwe Parks and Wildlife quota for a male lion for the available hunting area(s).

Also, accompanying the application is my check number 4016 in the amount of \$100.00 for the application fee.

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

Sincerely,


Thomas Michael Zulim

(b) (6)

Hockley, Texas (b) (6)

cc:

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

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



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

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

Federal Fish and Wildlife Permit Application Form

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

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

RCVD APR 05 2017

LB

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

A. Complete if applying as an individual			
1.a. Last name Zulim	1.b. First name Thomas	1.c. Middle name or initial (b) (6)	1.d. Suffix NA
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions) NA
6.a. Telephone number (b) (6)	6.b. Alternate telephone number NA	6.c. Fax number NA	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 NA	
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

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

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d)) Check attached. Check number 4016.	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 17US17083C/9 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 03/27/2017	

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:

- a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

P.1. melanochaita (African lion)

- b. Sex (if known).

Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:

- a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

See attached E.2.a.

- b. Date wildlife is to be hunted:

See attached E.2.b.

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

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

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

- a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

NA

- b. Date wildlife was hunted:

NA

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

NA

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

NA

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

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

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

See attached E. 5.

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

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

NA

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

Taxidermist/Broker's signature: _____ Date: _____

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

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

Applicant's signature:  _____ Date: 03/27/2017

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

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

I will use a designated port.

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

Same as indicated on page 1.

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

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

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

Tom Zulim

(b) (6)

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

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

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

USFWS PERMIT APPLICATION FORM 3-200-20: ZULIM, THOMAS MICHAEL**Attachment E.2.a.**

In view of the current US import permit situation regarding African lions, I am not able to book a hunt for the 2017 hunting season until such time that I actually receive an Africa lion import permit. To do otherwise (i.e., book a lion hunt before obtaining a permit), will put a significant amount of money at risk of being forfeited and permanently lost. Booking an African lion hunt will depend on whether I receive such permit and when it is received for the 2017 hunting season. If and when such permit is received will determine when and where the lion hunt will take place. Notwithstanding, what I can state is that if such permit is timely received for the 2017 hunting season, the lion hunt would take place at some time during the period August through December 2017, inclusive, and in one of the following two areas in Zimbabwe, depending on; (i) when the permit is received, (ii) the then-current availability of hunting dates for the available hunting area(s), and (iii) the then-current availability of a Zimbabwe Parks and Wildlife quota for a male lion for the available hunting area(s).

Mpondo Safaris

Country:	Zimbabwe
Operators Name:	Thathahamba Enterprises (Private) Limited t/a Mpondo Safaris
Address:	7B Birkenhead Road, Belmont, Bulawayo, Zimbabwe
Zimbabwe Tourism	
Operators HOP number:	0309
Area of hunt/place:	Riverside Ranch, Zimbabwe
Land owners name:	W. D. R. Bedford
GPS coordinates:	Latitude: 18 degrees, 23 feet, 15 inches South Longitude: 26 degrees, 18 feet, 4 inches North
Closest town:	Hwange Town, Zimbabwe
Area:	Matetsi Block, Zimbabwe
Region/Province:	Matabeleland North Province, Zimbabwe
Professional Hunter:	George Hallamore
PH license number:	144 (issued by Zimbabwe National Parks and Wildlife)

Nengasha Safaris

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

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

Attachment E.2.b.

As noted in Attachment E.2a., the hunt date will be some time during the period August through December 2017, inclusive.

Attachment E.5.

- a. Please see the information previously provided to USFWS by Conservation Force, Buby Valley Conservancy, Save Valley Conservancy, and the Zimbabwe authorities, all of which are incorporated herein by this reference.
- b. Please see the information accompanying this application, and incorporated herein by this reference, prepared and previously submitted to USFWS by Zimbabwe Parks and Management Authority titled: *"Legal Trade, Conservation and Rural Livelihoods: a Zimbabwean Perspective; - L.W. Nyaguse"*.
- c. Please see the information accompanying this application, and incorporated herein by this reference, dated February 16, 2016, by P. Greeff, operator of Mpondo Safaris in Zimbabwe.
- d. Please see the information accompanying this application, and incorporated herein by this reference, undated but pertaining to the hunt year 2016, by Paul Bernie, operator of the Deka Tail safari area in Zimbabwe.

Attachment E.5.b.

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY



LEGAL TRADE, CONSERVATION AND RURAL LIVELIHOODS: A ZIMBABWEAN PERSPECTIVE: - L.W. NYAGUSE



AREAS TO BE COVERED

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





SUSTAINABLE UTILISATION

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





POPULATION STATUS OF KEY SPECIES (ELEPHANTS)



REGION	1980	1983	1989	1993	1995	2001	2014	2001 vs. 2014
North-West Matabeleland	20 444	25 888	27 411	27 841	30 985	49 310	53 949	9.4% increase at 0.7% per annum
Zambezi Valley	10 152	9 907	13 029	14 361	16 842	19 297	12 211	36.7% decline at 2.8% per annum
Sebungwe	11 126	9 302	12 946	10 742	11 796	13 989	3 634	75% decline at 5.7% per annum
Gonarezhou	4 704	3 985	5 286	5 241	4 156	4 992	10 722	115% increase at 8.8 % per annum
TOTAL	46 426	49 082	58 672	58 185	63 779	88 123	80 516	8.6% decline at 0.7% per annum





Quota Setting and CITES Quotas

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



Quotas and Quota Setting Considerations

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



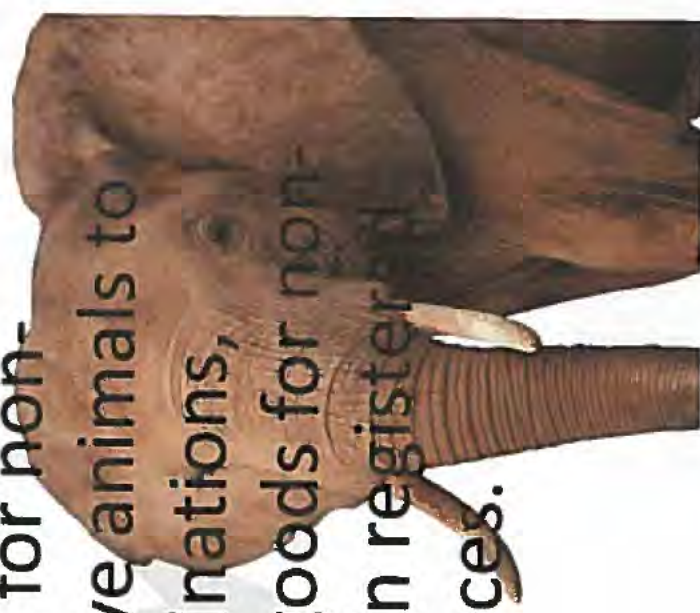
Quota Setting and CITES Quotas

Species	CITES Quota
Elephant	500
Leopard	500
Crocodile	200
Cheetah	50





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





FUNDING CONSERVATION

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

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

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

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



FUNDING CONSERVATION

Zimbabwe's Protected Area Management Funding

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





RURAL LIVELIHOODS AND LEGAL TRADE

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



HOW CAMPFIRE WORKS



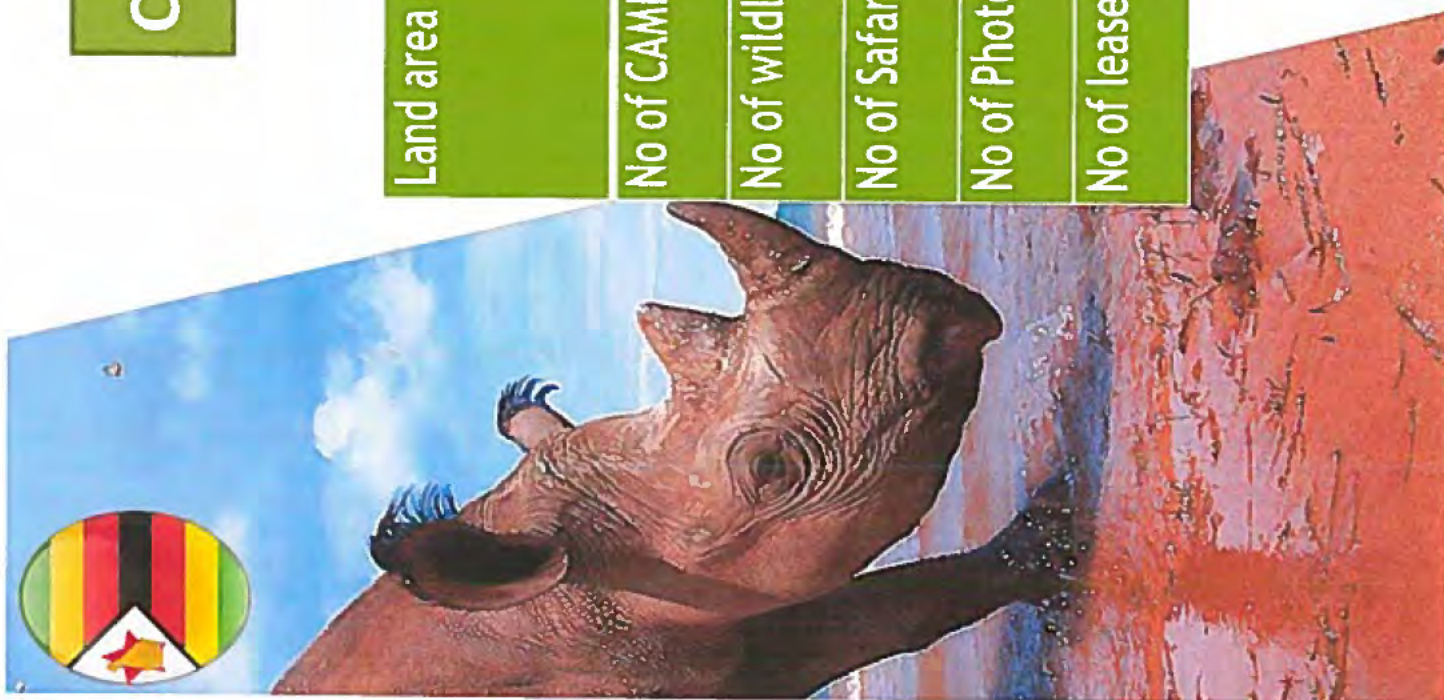
There are rural communities living adjacent or around most of Zimbabwe's National Parks or Protected Areas. These communal areas are under Rural District Councils (RDCs)

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

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

All these districts fall under the CAMPFIRE Association





CAMPFIRE AREAS

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



COMMUNITY BENEFITS



CAMPFIRE Revenue Sharing Guidelines are as follows:

- 55% of income is allocated to communities,
- 26% to the RDC to support costs attributable to CAMPFIRE activities,
- 15% for general RDC administration, and
- 4% as a levy to the Association.
- The 55% of income to communities is the minimum limit, which has been exceeded to 60% in Tsholotsho, as an example.

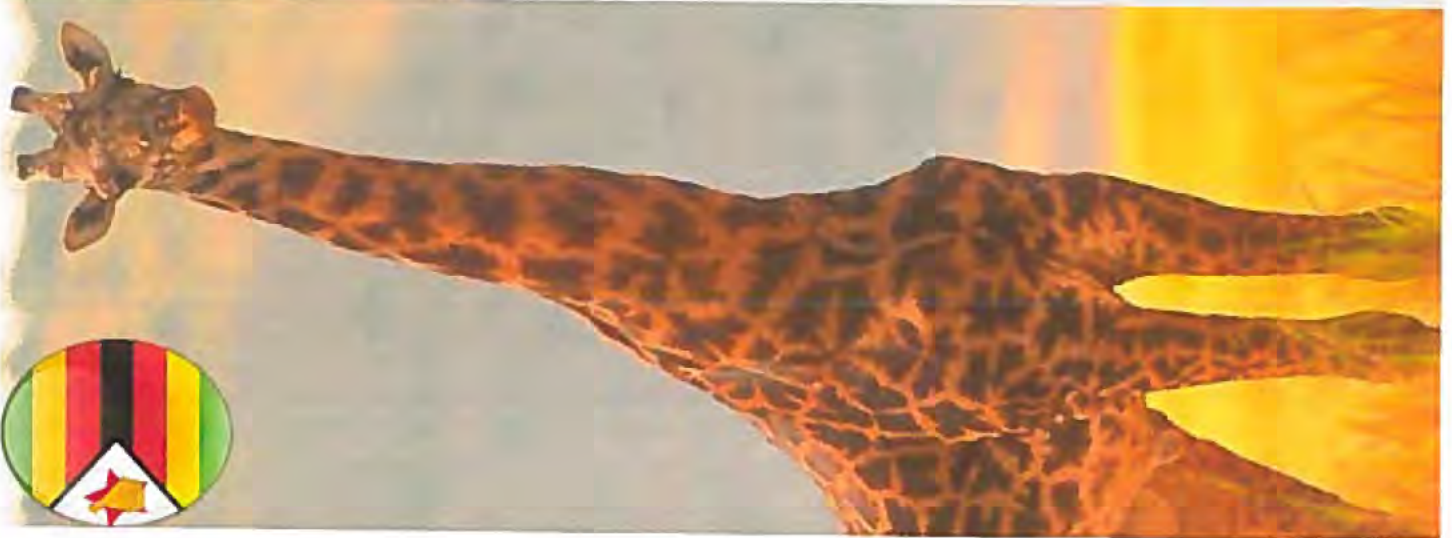




REVENUE GENERATION - HWANGWE

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





REVENUE GENERATION IN CAMPFIRE AREAS

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





REVENUE GENERATION IN CAMPFIRE AREAS

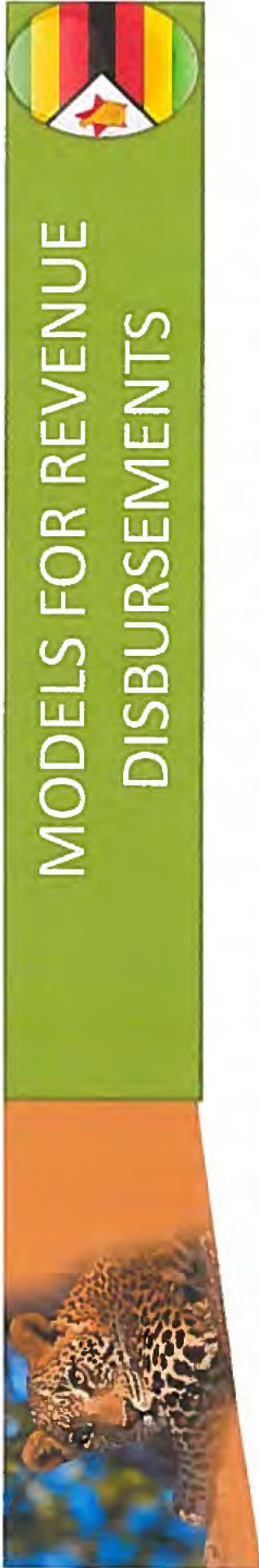
- As shown in the Table above, CAMPFIRE income is often understated as it is largely recorded based on income receipts from safari hunting only. Economic multipliers like taxidermy, travel, extended tourism activities, food and others, are not captured as part of CAMPFIRE income. The proportion of safari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





REVENUE GENERATION – CONT'D





MODELS FOR REVENUE DISBURSEMENTS

- The gross amount disbursed to communities as dividends from 1989 to 2006 was US\$20,8million, representing 52% of the total income earned. Total income generated between 2009 and 2015 was US\$10,2million. The amount disbursed to communities was US\$5,5million, representing 54% of total income earned.
- American clients generally constitute 76% of hunters in CAMPFIRE areas for all animals hunted each year. The suspension of ivory imports from Tanzania and Zimbabwe by the United States of America (USA) in April 2014 resulted in the cancellation of 108 out of 189 (57%) elephant hunts initially booked by US citizens in CAMPFIRE areas. As a result of the ban, CAMPFIRE income dropped to US\$1,1million in 2014, compared to US\$2,3million in 2013, as fewer American hunters conducted their safaris nevertheless in anticipation of the lifting of the ban. However, the ban continued into 2015, resulting in a massive decline of total CAMPFIRE income to US\$1,6million.



Use of Income

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



COMMUNITY PROJECTS FUNDED FROM CAMPFIRE REVENUE



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

IMPACT OF COMMUNITY BENEFITS ON CONSERVATION



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



THANK YOU
ΜΑΖΕΥΤΑΙΙΙΙ

Attachment E.5.c.

THATHAHAMBA ENTERPRISES (PRIVATE) LIMITED

t/a MPONDO SAFARIS

7B BIRKENHEAD ROAD
BELMONT, BULAWAYO
ZIMBABAWE

Email: pgreeffimpondo@gmail.com

Cell: 0772 104 008

16 February 2016

To Whom It May Concern

Mpondo Safari's operates on land acres adjoining Matetsi Safari area unit 4 and Deka Safari area. The Deka River cuts through the property which we spent a lot of money on damming to provide year round water for the game. We bought a herd of Buffalo for a breeding programme. The property also has 5 pans which we pump to all year round from the dam. This keeps the game spread out as not to pressurise the grazing around the dam. We have also drilled 3 boreholes on the property which we supply water from.

There are 15 workers employed on the property which are employed from the local community thereby supporting their families. Which, total over 60 people, 8 of these workers are on fulltime anti-poaching duty as we are under pressure from poachers, constantly removing snare lines. The cost of all the above is immense and would not be able to be funded without hunting. Due to the dry arid region we also supplementary feed the game during the winter months the food is trucked in from 360km away.

Kind Regards,



P. Greeff

Attachment E.5.d.

Suburbs

36A Townsend Road

Bulawayo

Zimbabwe

Tel: [+263 9 231329](tel:+2639231329) Fax: [+263 9 231329](tel:+2639231329)

Email: nengasha@gatorzw.co.uk or kaluga@yoafrica.com

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

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

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

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

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

Simply put without income from lion hunting we would be forced to curtail our anti poaching operations and this would be extremely detrimental to wildlife populations in the area.

Without control in an area the wildlife can be destroyed quickly – within 2 years it would be decimated.

In summary it is paramount we are able to market and export trophy lion into the USA in the interests of conservation.

Wildlife only survives in Africa if it has a value placed on it –

the higher the better.

We would therefore request you consider this application to import a trophy lion from our area into the USA in a favourable light.

Please find attached our hunting permit for this year reflecting the 2 lion on quota. Once permits are issued for next year we can furnish you with them.

Regards

Paul Bennie.

(b) (6)
THOMAS JULIAN
HOCKLEY, TX (b) (6)

March 27, 2017
Date

(b) (6)

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

Order of One hundred dollars & 00/100 Dollars 

 PROSPERITY BANK
WALLER BANKING CENTER
31250 FM 2820 • WALLER, TX 77484
833-372-9434 www.prosperitybankusa.com

For Permit Application Fee 3-200-22



(b) (6)



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

Federal Fish and Wildlife Permit Application Form

RCVD APR 4 2017

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

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

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

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

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

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. [Signature] Signature (in blue ink) of applicant person responsible for permit (No photocopied or stamped signatures)	
03/28/2017 Date of signature (mm/dd/yyyy)	

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:

- a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

LION - *LEO MELANOCYTA*

- b. Sex (if known).

MALE

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

- a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild: ZAMBIA; NKALA GAME MANAGEMENT AREA; KAFUE

VALLEY REGION; NEAREST TOWN: ITEZHI TEZHI;

GPS COORDINATES OF AREA HQ - S 15° 54.520' E 026° 00.233'

- b. Date wildlife is to be hunted:

23 JUNE - 7 AUG. 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

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

- a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

- b. Date wildlife was hunted:

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

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

Name: MIKE BORMAN
Business Name: BANGWELLU TAXIDERMISTRY LIMITED
Address: 4142/K CHIFWEMA ROAD
Address:
City: NEW KASAMA, LUSAKA
State/Province: ZAMBIA
Country, Postal Code: ZAMBIA

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

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

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

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

Taxidermist/Broker's signature: _____ Date: _____

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

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

Applicant's signature:  _____ Date: 3/28/2011

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

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

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

JASON (b) (6) WEBSTER

(b) (6)

HOUSTON, TX (b) (6)

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

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

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

JASON WEBSTER, (b) (6)

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

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

RCVD APR 4 2017

JASON (b) (6) WEBSTER

(b) (6)

KATY, TX (b) (6)

88-1196
1131 63

(b) (6)

DATE 3/28/2017

PAY TO U.S. FISH & WILDLIFE SERVICE \$ 100 00
THE ORDER OF

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Signature on Back



CommunityBank

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MEMO

PERMIT APPLICATION

(b) (6)

[Handwritten signature]

MP



Harlow, Caroline <caroline_harlow@fws.gov>

PRT-31670C

3 messages

Harlow, Caroline <caroline_harlow@fws.gov>

Fri, Oct 20, 2017 at 7:22 AM

To: (b) (6)

Mr. Webster,

I am finalizing your permit to import a sport-hunted lion trophy from Zambia and I need to put your home address on your permit. Can you confirm that your home address is that listed on your check submitted with your application? I will be mailing said permit to your office.

Caroline Harlow
Biologist
Division of Management Authority
Branch of Permits
5275 Leesburg Pike MS:IA
Falls Church VA 22041
703-358-1789

Jason Webster (b) (6)

Fri, Oct 20, 2017 at 8:58 AM

To: "Harlow, Caroline" <caroline_harlow@fws.gov>

(b) (6)

Richmond Tx (b) (6)

Please make sure the permit is good for one year. I go back to Zambia July 19, 2018

Jason (b) Webster

(b) (6)

Houston, Texas (b) (6)

(b) (6)

Sent from the iPhone. Please excuse the typos and autocorrect errors. Also, this email is confidential.

[Quoted text hidden]

Harlow, Caroline <caroline_harlow@fws.gov>

Fri, Oct 20, 2017 at 9:28 AM

To: Jason Webster (b) (6)

Mr. Webster:

Thanks so much and the permit will be issued for a year.

Caroline Harlow
Biologist
Division of Management Authority
Branch of Permits
5275 Leesburg Pike MS:IA
Falls Church VA 22041
703-358-1789

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
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May 11, 2017

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041

RCUD MAY 12 2017

LB

Re: Applications for Import of Sport-Hunted Lion and Elephant Trophies from Zimbabwe

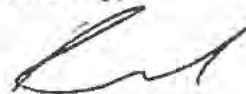
Dear Chief Van Norman:

Enclosed please find one application to import a sport-hunted elephant trophy from the Matetsi Safari Area in Zimbabwe. This area borders Hwange National Park and contains a high density of elephant. This hunt will generate essential revenue for local communities and for Zimbabwe's Parks and Wildlife Management Authority (ZPWMA). In evaluating this application, please consider the information previously submitted by ZPWMA, Conservation Force, the Safari Operators Association of Zimbabwe (SOAZ), the Zimbabwe Professional Hunters and Guides Association (ZPHGA), Safari Club International (SCI), and others. A list of some (but not all) of the key documents to consider is below.

Also enclosed, please find one application to import a sport-hunted lion trophy to be hunted in the Buby Valley Conservancy (BVC), Zimbabwe. The parties identified above, and the BVC itself, have submitted substantial information to prove how Zimbabwe's lion management and hunting program is well-managed, sustainable, and beneficial for the species. Please consider this information, some of which is listed below, in making a positive enhancement finding for this import.

Please do not hesitate to contact us if you have questions about these permit applications.

Sincerely,



Regina Lennox

List of some key documents on next page

† BARON BERTRAND DES CLERS, PH.D.
 † JAMES G. TEER, PH.D.
 † BART O'GARA, PH.D.
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 SHANE MAHONEY
 RENEE SNIDER

Some of the Key Documents in the FWS' Possession for Zimbabwe Lion

Document(s)	Date FWS Received
ZPWMA, Enhancement and Non-Detrimental Findings for <i>Panthera leo</i> in Zimbabwe (Oct. 2016)	11/29/16* (asterisk denotes from ZPWMA)
ZPWMA, Buby Valley Conservation Research, AWF, Sport-Hunting and Lion <i>Panthera leo</i> Conservation in Zimbabwe (Jan. 2016)	01/31/16*, 02/01/16, 04/20/16
ZPWMA, Conservation Status of African Lion in Zimbabwe (2015)	02/17/16*, 01/11/16, 04/20/16
ZPWMA & Panthera, Age Restrictions on Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe (2014)	01/11/16
B. du Preez, Buby Valley Conservancy Lion Research Report (Jan. 12, 2016)	01/12/16
ZPHGA/L. Muller, Report on Adaptive Lion Aging Results	01/25/16, 01/26/16
AWF/R. Groom, Lion Hunting in Zimbabwe's Save Valley Conservancy (Jan. 27, 2013)	01/26/16
Conservation Force, Email to T. Van Norman with links to videos demonstrating enhancement from hunting operators in Tanzania, Zambia, and Zimbabwe	02/24/16
ZPWMA, Conservation Strategy and Action Plan for the Lion (<i>Panthera Leo</i>) in Zimbabwe	04/20/16
CAMPFIRE Association/C. Jonga, Trophy Imports Suspension and the CAMPFIRE Program (2014)	04/20/16
CAMPFIRE Association/C. Jonga, Update 2015	04/20/16
Dr. C. Masterson (Ed.), Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe, Ethics and Coordination Committee for Ethical and Substantial Safari Hunting in Zimbabwe (Apr. 12, 2016)	04/20/16
M. Pieters Safaris, Lion Data, Anti-Poaching Blog, Nyami Nyami RDC Blog (African Conservancies) (2015 & 2016)	04/20/16
Michael Schwartz, Culling to Conserve: A Hard Truth for Lion Conservation, National Geographic Cat Watch (Feb. 25, 2016)	04/20/16
L. Muller, Rifa Safari Area/Pro Safaris Africa, Report on Lion Panthera Leo (Jan. 25, 2016)	04/20/16
Cliff Walker Safaris, Enhancement Report (2016)	04/20/16
DAPU, Year-End 2015 Report (2015)	04/20/16
Chiefs, EU in Wildlife Talks, The Herald (Apr. 2, 2016)	04/20/16

Some of the Key Documents in the FWS' Possession for Zimbabwe Elephant

Document(s)	Date FWS Received
ZPWMA, Non-Detriment Finding for African Elephant in Zimbabwe (May 16, 2014)	12/15/14
ZPWMA, Response to Apr. 4, 2014 FWS Questionnaire (with attachments)	04/17/14*, 06/06/14

CONSERVATION FORCE

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 SHANE MAHONEY
 RENEE SNIDER

African Elephant Specialist Group/H. Dublin, Email to R. Gabel (FWS)	05/30/14
Conservation Force, First Comment on Apr. 2014 Negative Enhancement Finding (with 98 attachments)	06/06/14
Zimbabwe, Parks and Wildlife Act (as amended 2001)	06/06/14
CAMPFIRE Association/C. Jonga, Trophy Imports Suspension and the CAMPFIRE Program (2014)	06/06/14
E. Gandiwa et al., 21 Journal for Nature Conservation 133-42, Illegal Hunting and Law Enforcement during a Period of Economic Decline in Zimbabwe: Case Study of Northern Gonarezhou National Park and Adjacent Areas (2013)	06/06/14
Safari Operators Association of Zimbabwe, Status of Elephant Populations, Hunting and Anti Poaching Effort in Safari Areas in Zimbabwe Report (Apr. 2014)	06/06/14
World Bank, Project Appraisal Document on a Proposed Grant from the Global Environment Facility Trust Fund in the amount of US\$5.64 Million to the Republic of Zimbabwe for the Hwange-Sanyati Biological Corridor Project (Apr. 28, 2014)	06/06/14
K.M. Dunham, Aerial Survey of Elephants and other Large Herbivores in the Zambezi Heartland (Zimbabwe, Mozambique and Zambia): 2003 (May 2004)	06/06/14
K.M. Dunham et al., Aerial Survey of Elephants and Other Large Herbivores in North-West Matabeleland, Zimbabwe 2007 (Dec. 2007)	06/06/14
J. Selier, Elephant Aerial Census of the Central Limpopo River Valley (Sept. 2012)	06/06/14
Wildlife and Environment Zimbabwe, Matabeleland Branch, 2013 Game Census for Hwange National Park and Surrounding Areas (2013)	06/06/14
Gonarezhou Conservation Project, Aerial Survey of Elephants and other Large Herbivores in Gonarezhou National Park and Surrounding Areas (2013)	06/06/14
R. Martin Personal comment and attachments sent to FWS	10/04/14
Conservation Force, First Comment on July 2014 Negative Enhancement Finding (with 55 attachments)	10/21/14
R. Martin, First Report: Costs of Protection of Elephant Areas; Second Report: Trophy Hunting from Declining Populations; Third Report: Potential Financial Returns from Trophy Hunting; Fourth Report: Application of Returns from Trophy Hunting to Reduction of Illegal Hunting (2014)	10/21/14
C.J. Joubert & L. Joubert, Aerial Survey of the Larger Herbivores, Savé Valley Conservancy, Zimbabwe (Sept. 2012)	10/21/14
K.M. Dunham, Trends in Populations of Elephant and Other Large Herbivores in Gonarezhou National Park, as Revealed by Sample Aerial Surveys (2012)	10/21/14

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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B.W. Clegg, Large Mammal Population Estimates for Malilangwe Wildlife Reserve (Nov. 2013)	10/21/14
KAZA TFCA, Pan African Elephant Survey Proceedings of the Workshop (Apr. 28-29, 2014)	10/21/14
G. Wittmeyer et al., Illegal Killing for Ivory Drives Global Decline in African Elephants (July 22, 2014)	10/21/14
T. De Meulenaer, Email re: Panel of Experts (July 7, 2014)	10/21/14
U.S. Sport Hunting Ban to Reduce Revenues, The Herald (Oct. 2, 2014)	10/21/14
African Elephant Specialist Group/H. Dublin Comment on July 2014 Finding	11/03/14
Conservation Force, Email to T. Van Norman forwarding National Elephant Management Plan Workshop agenda	12/01/14
Conservation Force, Email to T. Van Norman forwarding PowerPoint presentation with preliminary 2014 aerial survey results	12/05/14
ZPWMA, Response to Oct. 31, 2014 FWS questionnaire	12/10/14
Conservation Force, Second Comment on July 2014 Negative Enhancement Finding (with 16 attachments)	12/15/14
K.M. Dunham, National Survey of the Elephant in Zimbabwe 2014: Some Preliminary Results (Dec. 2, 2014)	12/15/14
E. Gandiwa et al., Proceedings of the CAMPFIRE Stakeholders' Workshop: Towards the Development of a New Elephant Management Plan and Policy (Nov. 17-18, 2014) (with attachments)	12/15/14
Conservation Force, Summary of CAMPFIRE Workshop (Nov. 17-18, 2014)	12/15/14
Conservation Force, Email to T. Van Norman forwarding CAMPFIRE Workshop Proceedings	12/16/14
Conservation Force, Email to T. Van Norman forwarding National Elephant Management Plan Workshop Proceedings	12/23/14
Conservation Force, Email to T. Van Norman forwarding comments from the authors of the SVC 2013 Survey	01/06/15
Conservation Force, Third Comment on July 2014 Negative Enhancement Finding (with safari operator enhancement attachments)	01/19/15
Conservation Force, Email to T. Van Norman attaching recent CITES/MIKE update	03/11/15
Conservation Force Email to T. Van Norman forwarding article regarding effect of FWS suspension on CAMPFIRE	04/13/15
Conservation Force Email to T. Van Norman forwarding Mana Pools Elephant Management Plan Workshop Proceedings	05/05/15
Conservation Force Email to T. Van Norman forwarding agenda for Sebungwe Elephant Management Plan Workshop	05/08/15
ZPWMA, Response to May 12, 2015 FWS questionnaire (with ten attachments)	07/20/15*

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
 † JAMES G. TEER, PH.D.
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 CHRISSIE JACKSON
 PHILIPPE CHARDONNET, D.V.M.
 BERT KLINEBURGER
 SHANE MAHONEY
 RENEE SNIDER

Conservation Force Email to T. Van Norman forwarding South East Lowveld Elephant Management Plan Workshop Proceedings	09/30/15
Conservation Force Email to T. Van Norman forwarding AWF/A. Pole email describing Cabinet subcommittee meeting to address poisoning	11/30/15
Conservation Force Email to T. Van Norman forwarding CAMPFIRE Association/C. Jonga analysis of income to CAMPFIRE districts from licensed, regulated hunting	12/01/15
Conservation Force Email to T. Van Norman attaching two presentations, one made by the CAMPFIRE Association and one made by Chief Chisunga of the Masoka Ward in the Mbire District at the AWCF	12/07/15
Conservation Force, Email to T. Van Norman with links to videos demonstrating enhancement from hunting operators in Tanzania, Zambia, and Zimbabwe	02/24/16
Conservation Force Email to T. Van Norman forwarding final print of Zimbabwe's National Elephant Management Plan	02/29/16
Conservation Force Email to T. Van Norman attaching article on continued losses in Zimbabwe's hunting sector due to FWS suspension	05/02/16
ZPWMA, Letter explaining Tsholotsho quota article	05/09/16*
African Elephant Specialist Group African Elephant Status Report 2016	09/2016
ZPWMA, Plan Priorities/The Zimbabwe National Elephant Supplementary Management Plan (2015-2020)	11/09/16*
Conservation Force, Email to T. Van Norman attaching presentation on Zimbabwe's elephant management and CBNRM by Elephant Coordinator	12/27/16
CAMPFIRE Association, The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program	04/06/17
CITES/MIKE, Levels and Trends of Illegal Killing of Elephants in Africa (to 31 Dec. 2016)	04/06/17
Many safari operator reports and/or reports of anti-poaching operations funded by safari hunting operators, most especially in the Zambezi Valley and the Sebungwe ranges	06/06/14, 10/21/14, 01/19/15, 04/13/15, 06/15/15, 11/30/15, 12/03/15, 01/05/16, 05/23/16, 01/18/17, and as described above



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

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

Federal Fish and Wildlife Permit Application Form

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

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

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

A. Complete if applying as an individual			
1 a. Last name NOBLE	1 b. First name Samuel	1 c. Middle name or initial (b) (6)	1 d. Suffix (b) (6)
2. Date of birth (mm/dd/yyyy) (b) (6)		3. Affiliation/ Doing business as (see instructions) (b) (6)	
4. Telephone number (b) (6)	5. Alternate telephone number (b) (6)	6. Fax number (b) (6)	7. 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 Scottsboro	1 c. State AL	1 d. Zip code/Postal code (b) (6)	1 e. Country/Province USA
2 a. Mailing Address (include if different than physical address; include name of contact person if applicable) (b) (6)			
2 b. City Scottsboro	2 c. State AL	2 d. Zip code/Postal code (b) (6)	2 e. Country USA

D. All applicants MUST complete	
1	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in Instructions. (50 CFR 13.11(d))
2	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input type="checkbox"/>
3	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. (b) (6) Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) (b) (6) Date of signature (mm/dd/yyyy) 04/24/2017

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
P. l. melanochaita (African lion)
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
Sango Ranch, Save Valley Conservancy, Masvingo, Zimbabwe
 - b. Date wildlife is to be hunted:
4/30/2017 - 5/20/2017
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks). *life size mount, skull, claws*
All parts including skin, skull, teeth, and claws
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
N/A
 - b. Date wildlife was hunted:

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

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

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

Name: *Winston Taylor*

Business Name: *Zambezi Hunters*

Address: *2 Peckham Road, Newlands, Harare Zimbabwe*

Address:

City: *Harare*

State/Province:

Country, Postal Code: *Zimbabwe*

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

Please see information provided by Conservation Force, Bulye and Save Valley Conservancies, and Zimbabwe authorities. **CERTIFICATION STATEMENT** (original signature must be provided for either 6 or 7 below)

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

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

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

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

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

Applicant's signature: *[Signature]* Date: *04/24/2017*

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

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).
9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):
10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.
- ☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.
11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
John J. Jackson, III or Regina Lennox of Conservation Force
504-837-1233, jjw-no2@att.net or regina.lennox@conservationforce.org
12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?
- ☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.


NOTICE OF REPRESENTATION

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

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

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

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

Signed:  (b) (6)

Name: Samuel (b) (6) Noble, (b) (6)

Date: 04/24/2017

SAMUEL (b)(6)
(b)(6)
SCOTTSBORO, AL (b)(6)

4/24/2017

(b)(6)

PAY

To the order of

U.S. Fish & Wildlife Service

and

NYS

Dollars

\$ 100.00

One hundred



BRANCH BANKING AND TRUST COMPANY
1-800-BANK 1001 BBK.com

The

Open Here

[Signature]

(b)(6)

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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

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 BERT KLINEBURGER
 SHANE MAHONEY
 RENEE SNIDER

June 1, 2017

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

Re: Applications for Import of Sport-Hunted Lion Trophies

Dear Chief Van Norman:

Enclosed please find two applications for permits to import sport-hunted lion trophies. The first application is to import a sport-hunted lion trophy from Zambia. The applicant is hunting with Mulimo Safaris in a game management area. The safari operator invests significantly in anti-poaching and community development. A report from this operator will be emailed to your attention shortly.

The second application is to import a sport-hunted lion trophy from Tanzania. The applicant is hunting with Michel Mantheakis Safaris. Conservation Force submitted an operator enhancement report from this company on October 21, 2016. This report is attached again for ease of reference. It demonstrates that Michel Mantheakis Safaris employs over 40 rural community members including 15 anti-poaching scouts; invested over \$280,000 in anti-poaching in the 2013-2015 period; and invested over \$120,000 in community development in the 2013-2015 period, among other things. These significant contributions are largely funded by a U.S. client base, and 100% of the company's lion safaris involve U.S. citizens. The information in this report demonstrates that the hunting of lion in these concessions enhances the survival of the species (which is doing well in the company's concessions).

Please do not hesitate to contact us if you have questions about these permit applications.

Sincerely,

Regina Lennox

NOTICE OF REPRESENTATION

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

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

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

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

Signed:  (b) (6)  (b) (6)

Name: Richard (b) (6) Papapietro (b) (6)

Date: 5/28/17

Lion trophy
import
Zam Sta



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

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

Federal Fish and Wildlife Permit Application Form

RCVD JUN 8 2017

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


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

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

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

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

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

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: Mongolia Argali No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  (b) (6) Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)	
Date of signature (mm/dd/yyyy) 6/29/2017	

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
P. l. melanochaita (African lion)
 - b. Sex (if known).
Male
2. IF ANIMAL IS CURRENTLY LIVING IN THE WILD, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild: Zambia, Sich. Fulo GMA, Nearest Town: Mulobezi
Latitude: -16.82944 Longitude: 25.49640
 - b. Date wildlife is to be hunted: June 19 - July 7, 2017
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
All parts including skin, skull, teeth, and claws
3. IF THE ANIMAL IS DEAD, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
N/A
 - b. Date wildlife was hunted:

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

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

Name: Mike Borman
Business Name: Bangweulu Taxidermy Ltd.
Address: 4142/ Chifwema Road
Address: New Kasama
City: Lusaka
State/Province:
Country, Postal Code: Zambia

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

Please see information provided by Conservation Force, Zambian authorities, and Zambian operators.

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

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

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

Taxidermist/Broker's signature: _____ Date: _____

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

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

Applicant's signature: _____ Date: 5/29/17

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

RCVD JUN 8 2017

Richard (b) (6) Pananietro (b) (6)
Saratoga, CA (b) (6)
(b) (6)

First Republic Bank
275 Los Gatos Saratoga Rd
Los Gatos, CA 95030
11-8186/3210

(b) (6)

5/28/17

PAY TO THE ORDER OF US Dept of Fish and Wildlife

\$ 100.00

one hundred and 00/100

DOLLAR

MEMO lion

[Signature]

(b) (6)

† 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

July 14, 2017

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041

RCVD JUL 20 2017



Re: Application to Import a Sport-Hunted Lion Trophy from Zambia

Dear Chief Van Norman:

Enclosed please find one application to import an African lion trophy hunted in Zambia in 2016. Please consider the safari operator reports and the other documents submitted by Conservation Force and the Zambian Department of National Parks and Wildlife in making an enhancement determination for this application.

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

Sincerely,



Regina Lennox

Dear. US Fish and Wildlife Services

My name is Fred Rich and I have attached the application fee and the Federal Fish and Wildlife Permit Application Form. If you have any questions please give me a call or email.

Email: (b) (6)

Cell: (b) (6)

My mailing address is (b) (6) Portland, Texas (b) (6)

Thank You,

Fred Rich

NOTICE OF REPRESENTATION

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

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

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

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

Signed: Fred (b) (6) Rich

Name: Fred (b) (6) Rich

Date: 03-01-2017



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

OMB No 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

RCVD JUL 20 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 Threatened-listed
(Appendix I of CITES and/or ESA) lion

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

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

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

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

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) <u>Fred Rich</u> Date of signature (mm/dd/yyyy) <u>03-01-2017</u>	

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
P. l. melanochaita (African lion)
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
 - b. Date wildlife is to be hunted:
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
All parts including skin, skull, teeth, and claws
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
MUMBAWA WEST GAME MANAGEMENT AREA
WESTERN PROVINCE - ZAMBIA GIS COORDS 514°59.563' -
E 026°01-350'
 - b. Date wildlife was hunted:
JULY 10th, 2016

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

SKULL & FULL SKIN FOR A LIFESIZE 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]:

PLOT 10549, LUMUMBA ROAD, LUSAKA, ZAMBIA

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

Name: MANGOMBA SAFARIS
Business Name:
Address: PLOT NO 2170M
Address: LEOPARDS HILL ROAD
City:
State/Province: LUSAKA
Country, Postal Code: ZAMBIA

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

Please see information provided by Conservation Force, Zambian authorities, Zambian operators, and others.

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

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

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

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

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

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

Applicant's signature:  Date: 03-01-2017

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

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

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

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

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

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

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

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

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





PROSPERITY BANK®

MEMBER FDIC

REMITTER FRED RICH
PRT 88 SER 4

PAY TO THE ORDER OF U S FISH & WILDLIFE SERVICES
One Hundred and 00/100*****

CASHIER'S CHECK No. (b) (6)

Jun 16, 2017

\$ 100.00

NOTICE TO CUSTOMERS
BEFORE THIS CHECK WILL BE REQUIRED
THE EVENT IT IS LOST, MISPLACED OR STOLEN.

(b) (6)

(b) (6)

TWO SIGNATURES REQUIRED
AUTHORIZED SIGNATURE
AUTHORIZED SIGNATURE

† BARON BERTRAND DES CLERS, Ph.D.
† JAMES G. TEER, Ph.D.
† BART O'GARA, Ph.D.
† DON LINDSAY
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August 18, 2017

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

RCVD AUG 22 2017

Re: Application to Import a Sport-Hunted Lion Trophy from Zimbabwe; Enhancement Report

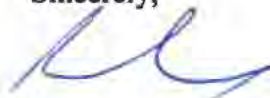
Dear Chief Van Norman:

Enclosed please find one application to import an African lion trophy to be hunted in Zimbabwe in 2018. Please consider the information in the DMA's files, and please do not hesitate to reach out to Conservation Force or ZPWMA if updated information is required to make a 2018 finding; however, we believe current information including the Non-Detriment Finding received in late November 2016 is sufficient to approve 2018 import permits.

Also enclosed, please find an Operator Enhancement Report from Mangomba Safari Company, Ltd. (Zambia). Mr. Fred Rich, whose application was submitted on July 14, hunted a lion with Mangomba in 2016. As this report demonstrates, Mangomba's efforts in protecting a 1,441 km² concession and its community investment efforts (including over \$50,000 paid to local communities and distribution of over half of hunted meat) are enhancing the survival of the lion. The company's stewardship has resulted in at least a 10% increase in prey base species in the area. They also maintain a strict age-based offtake policy. Almost all (95%) of Mangomba's clients are U.S. citizens, directly connecting the benefits for lion and other species to the contributions of U.S. hunters.

Please do not hesitate to contact us if you have questions about this information or this application.

Sincerely,





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

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

Federal Fish and Wildlife Permit Application Form

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

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

RCVD AUG 22 2017

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

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

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

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

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that a false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature (in blue ink) of applicant: _____ permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 8/17/2017	

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:

- a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

P. l. melanochaita (African lion)

- b. Sex (if known).

Male

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

- a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

KAZUMA FOREST/PANDA-MASUIE FOREST AREA, ZIMBABWE, AFRICA

- b. Date wildlife is to be hunted:

MAY 1-21, 2018

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

ALL PARTS, INCLUDING SKIN, SKULL, TEETH AND CLAWS

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

- a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

N/A

- b. Date wildlife was hunted:

N/A

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

N/A

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

N/A

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

Name: CHIPITANINI SAFARI COMPANY
Business Name: RIVONIA DRIVE MOUNT PLEASANT,
Address: HARARE, ZIMBABWE, AFRICA
Address:
City:
State/Province:
Country, Postal Code:

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

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below) **safar! operators, and others**

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: *Th* *Wby* Date: 8/17/2017

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

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

NOTICE OF REPRESENTATION

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

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

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

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

Signed: _____

Name: _____

Date: _____

8/17/2017

ENHANCEMENT REPORT

MANGOMBA SAFARI COMPANY, LTD.

Plot 2170/M Leopards Hill Road, Box 30084, Lusaka.

mangombasafaris@yahoo.com

Mumbwa West Game Management Area, Zambia

I. DESCRIPTION OF COMPANY AND CONCESSION

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

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

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

II. ANTI-POACHING COMPONENT

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

A. Law Enforcement

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

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

B. Fire Management

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

C. Scouts Management

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

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

From late November 2016 to date:

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

D. Distribution of meat to the Community

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

E. Road Clearance

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

III. COMMUNITY PARTICIPATION

A. Community Assistance Component

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

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

IV. OTHER INFORMATION

Prey Base

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

Lion Aging Approach

Mangomba Safari Limited has been following an age-based policy for African lion trophies since 2016, we have adopted a company rule not to harvest lion below six years of age, and to be conservative in estimating age.

As a result, on lion hunts we often pass by a number of potential lion before allowing a client to harvest a specimen. Sometimes we do not shoot a lion at all because we are so selective. We successfully harvested mature (aged six or older) male lion up to our quota (of two).

Lion Hunting Revenue

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

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

U.S. Hunters


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

CONCLUSION

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

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

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

Signed: 

Operator Name: Mangomba Safaris Limited

Title: Director

THOMAS WHALEY
MARSHALL, TX

(b) (6)

PRELIMINARY

8/18/17

Pay to the Order of U.S. Fish & Wildlife Service \$ 100⁰⁰
one hundred & no/100 Dollars

CITIZENS NATIONAL BANK
Marshall, TX 75670 800-833-9934
Member FDIC



Elizabeth

(b) (6)



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

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

Federal Fish and Wildlife Permit Application Form

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

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

RECEIVED OCT 27 2016

LB

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

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

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

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

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 03US073561/9 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) <u>Kelly Keithly</u> Date of signature (mm/dd/yyyy) <u>October 24, 2016</u>	

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
Panthera Leo Melanochaita, African Lion
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
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):
Zimbabwe, Kazuma/Pandamasuie Forest in the Victoria Falls District, Matabeleland North Province.
 - b. Date wildlife was hunted:
September 23, 2016 through October 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).

Male African Lion: Skin, Skull, Claws

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

Outbound Cargo and Trophy Exporters, 5 Grantham Road, PO Box 8401, Belmont, Buawayo, Zimbabwe

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

Name: Outbound Cargo and Trophy Exporters
Business Name: 5 Grantham Road
Address: PO Box 8401
Address: Belmont, Buawayo
City: Zimbabwe
State/Province:
Country, Postal Code:

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

See attachment.

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: Oct 24, 2017

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

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

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

Same address as Page 1, C

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):

Kelly Keithly, (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.

Attachment to Federal Fish and Wildlife Permit Application Form
Type of Activity: Import of Sport-Hunted Trophies

#5. Additional Information:

Kazuma/Pandamasuie is located in a massive unfenced wildlife block encompassing approximately 10 million acres that includes the Matetsi Safari Area and at least 3 National Parks - Hwange, Zambezi and Kazuma Pan. Natural surface water during the dry season in this wilderness block is extremely limited since there are very few permanent rivers. The animals are mostly dependent upon water that is pumped from boreholes. A considerable percentage of the trophy fees for animals sustainability hunted in Kazuma/Pandamasuie is utilized for the management of 5 boreholes that have been drilled solely for the benefit of the wildlife. Other conservation practices that are conducted in the area from trophy fee revenue include the construction of fireguards, and extensive anti-poaching operations. Lion populations in the Province are carefully monitored by Predator Research groups based in Hwange and Victoria Falls. The annual lion quota for Kazuma/Pandamasuie is based on accurate research on the population trends, and on the age of the lions harvested during the previous season. In the event that a lion under the age of 6 years is taken as a trophy, one will be deducted from the quota for the following year. This ensures a sustainable off take of old animals that are beyond breeding age. The Forestry Commission of Zimbabwe, which is the appropriate authority for Kazuma/Pandamasuie, also play an active role in various community programs in the District. These programs are partly funded by hunting revenue, and Community benefits from safari activities help educate the local people on the value of the wildlife. In turn, the communities assist with protecting the animals, including lions, from poaching and human/wildlife conflict. Matabeleland North Province is faced with a serious human/wildlife conflict issue including the loss of livestock to lions that stray out of the National Parks and Forestry Estates. Rather than ordering these "problem" lions to be shot, the authorities now call on Conservation groups to try and capture the culprit animals and relocate them back to the National Parks. A significant portion of the costly capture and relocation exercises are funded by Safari Outfitters who operate in these areas.

WESTERN UNION **WU**
Moving money has never been better

THIS DOCUMENT CONTAINS A TRIM WATERMARK. HOLD UP TO LIGHT TO VIEW

WESTERN UNION FINANCIAL SERVICES INC. - ISSUER - Englewood, Colorado

Payable at Wells Fargo Bank Grand Junction - Downtown, N.A., Grand Junction, Colorado

MONEY ORDER

FOOD CITY
(ISSUING AGENT)

(b) (6)

(b) (6)

\$ 100.00

PAY EXACTLY ONE HUNDRED DOLLARS AND NO CENTS

PAY TO THE ORDER OF

U.S. Fish and Wildlife Services

(b) (6)

Phoenix Az

(b) (6)

PAYMENT FOR/ACCT. #

Koody G. Kaitaly

PURCHASER'S SIGNATURE

Signature of purchaser must be written in the space provided

(b) (6)

† BARON BERTRAND DES CLERS, PH.D.

† JAMES G. TEER, PH.D.

† BART O'GARA, PH.D.

January 26, 2016

BOARD OF DIRECTORS:

JOHN J. JACKSON, III, J.D.
PHILIPPE CHARDONNET, D.V.M.
GERHARD DAMM
BERT KLINEBURGER
DON LINDSAY
SHANE MAHONEY
DALE TOWELL, PH.D.

Mr. Timothy Van Norman
Chief, Branch of Permits
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

Dear Chief Van Norman:

RCVD JAN 28 2016

LB

Enclosed please find four applications for permits authorizing the import of sport-hunted trophies of *P. l. melanochaita* from Zimbabwe. In evaluating these applications, please consider the information on lion conservation and management in Buby Valley Conservancy, Save Valley Conservancy, and Zimbabwe on the whole already submitted by Conservation Force and others. An index of this information is attached to this letter.

The information submitted by Conservation Force demonstrates that the lion conservation and management program in Zimbabwe, and specifically in Buby Valley and Save Valley Conservancies, enhances the survival of the species because it addresses the three main threats to lion: (1) loss of habitat, (2) loss of prey base, and (3) human-lion conflict, and more.

First, the information demonstrates that habitat would not otherwise exist for lion in Buby Valley and Save Valley Conservancies but for the income generated by tourist safari hunting. Both conservancies rely on the income from tourist safari hunting to fund their operations. If hunting stopped, the 1.7 million acres of habitat protected in these conservancies are likely to be lost to the lion, rhino, and prey species.

Second, Buby Valley and Save Valley Conservancies each engage in extensive anti-poaching operations that protect the lion's prey base. For example, in 2015, Buby Valley Conservancy spent \$590,000 on game scouts and anti-poaching. All of these funds were generated by tourist safari hunting.

Finally, the information shows the significant community assistance programs in place in each of these conservancies. Buby Valley Conservancy and Save Valley Conservancy each contribute \$100,000 annually to local communities in cash, services, game meat, and supplies. This support is used to build schools and clinics, maintain water infrastructure, assist with repairs and maintenance of equipment, fund school books and field trips, increase consumption of protein, and otherwise improve the quality of life for local residents. Because of these benefits, local people are more willing to tolerate lion, and human-lion conflicts are reduced.

We believe the information already in the Fish and Wildlife Service's possession satisfies the requirements of 50 C.F.R. § 17.40(r) for Zimbabwe. However, we will continue to submit information about the benefits generated by safari hunting as it becomes available.

Sincerely,

John J. Jackson, III on behalf of
Conservation Force

Enclosures:

- Application submitted on behalf of Steven Chancellor for a sport-hunted lion trophy to be hunted in Buby Valley Conservancy, Zimbabwe
- Application submitted on behalf of Kent Greenawalt for a sport-hunted lion trophy to be hunted in Buby Valley Conservancy, Zimbabwe
- Application submitted on behalf of James Horrocks for a sport-hunted lion trophy to be hunted in Buby Valley Conservancy, Zimbabwe
- Application submitted on behalf of Jeffrey Smithers for a sport-hunted lion trophy to be hunted in Buby Valley Conservancy, Zimbabwe
- Index of Documents Submitted

NEW INFORMATION ON THE AFRICAN LION

INDEX FOR: ZIMBABWE

No.	Title	Sent to FWS
1	Zimbabwe Parks & Wildlife Management Authority, Conservation Status of the African Lion (<i>Panthera leo</i>) in Zimbabwe (January 2015)	1/11/16
2	Zimbabwe Parks & Wildlife Management Authority, Age Restrictions on Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe (2014)	1/11/16
3	Dr. Byron du Preez [Oxford], Buby Valley Conservancy Lion Research Report (Jan. 12, 2016)	1/12/16
4	Blondie (Mazunga Safaris), Email re: Community Assistance Program in BVC (Jan. 20, 2016)	1/26/16
5	Blondie (Mazunga Safaris), BVC – Spreadsheet, Community Assistance 2011 & 2012	1/26/16
6	Zig, Photos of BVC Community Assistance Program	1/26/176
7	ZPHGA, Info on Lion Age Restrictions (Jan. 20, 2016)	1/25/16 Louis M 1/26/16 Us
8	Dr. Byron du Preez et al., Sport Hunting and Lion (<i>Panthera leo</i>) Conservation in Zimbabwe (Jan. 22, 2016)	1/26/16
9	Dr. Rosemary Groom, Lion Hunting in Zimbabwe's Save Valley Conservancy (Jan. 27, 2013)	1/26/16

RCVD JAN 28 2016

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
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

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

THREATENED-LISTED
LION: BA
Bubye Valley Co.

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

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

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

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: LEOPARD - CAN NOT RECALL THE NUMBER No <input type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. North Greenawalt Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 01/20/2016

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

P. I. MELANOCHAITA (AFRICAN LION)

b. Sex (if known).

MALE

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

ZIMBABWE: DUDYE VALLEY CONSERVANCY, BEIT BRIDGE DISTRICT, MATABELELAND SOUTH, NEAREST TOWN IS BEIT BRIDGE AND NEAREST CITY IS BULAWAYO. GPS COORDINATES FOR TOWLA ARE S2126478, E02953162. HUNTING AREA IS A WILDLIFE CONSERVANCY OF 850,000 ACRES.

b. Date wildlife is to be hunted:

AUGUST 2016

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

ALL PARTS INCLUDING SKIN, SKULL, TEETH, AND CLAWS

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

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

N/A

b. Date wildlife was hunted:

N/A

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

NA

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

NA

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

Name:

STEVE COLLETTIS

Business Name:

Address:

15 JOSIAH CHINAMANO ROAD

Address:

City:

BULAWAYO

State/Province:

Country, Postal Code: ZIMBABWE

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

See documents furnished by Conservation Force, et al.

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

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

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

Taxidermist/Broker's signature: _____

Date: _____

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

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

Applicant's signature: _____

Date: _____

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

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).
9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):
10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.
- ☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.
11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
JOHN J. JACKSON, III OR REGINA LENNOX of CONSERVATION FORCE.
504-837-1233, JJW-NO2@ATT.NET OR REGINA.LENNOX@CONSERVATIONFORCE.ORG
12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?
- ☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

NOTICE OF REPRESENTATION

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

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

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

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

Signed: _____

Name: _____


Date: _____

W. H. Greenawalt
KENT (b) (6) GREENAWALT
January 20, 2016



KENT GREENAWALT 03-09
ROANOKE, VA (b)(6)

Pay to the Order of UNITED STATES FISH AND WILDLIFE SERVICE JANUARY 20, 2016 Date

ONE HUNDRED FIFTY AND 00/100 \$ 150.00

 **First Citizens Bank**

For Art Greenawalt (b)(6)

Security Features:  Dollars  MP

1-28-16

Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe

Dr Byron du Preez^{†1}, Dr Rosemary Groom^{‡2}, Olivia Mufute^{§3} and
Roseline Mandisodza-Chikerema^{¶3}

¹Bubye Valley Conservation Research Initiative

²African Wildlife Conservation Fund

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January 31, 2016



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SUMMARY OF STEPS TAKEN BY ZIMBABWE TO IMPROVE THE MANAGEMENT OF LION SPORT-HUNTING

- i* – Banning of all lioness hunting in Zimbabwe
- ii* – Hunting moratoria around the Gonarezhou and Hwange National Parks
- iii* – Removal of fixed hunting quotas
- iv* – Age restrictions on sport-hunted lions
- v* – Scientifically-based adaptive quota management system

SUMMARY OF LION SPORT-HUNTING'S CONTRIBUTION TO CONSERVATION

- i* – Lion sport-hunting contributes 33.9% to 42.4% of total revenue on private land
- ii* – Lion sport-hunting generates up to US\$ 557 km⁻²
- iii* – Anti-poaching (in particular that of rhinoceroses) costs ~US\$ 216 km⁻²

INTRODUCTION

THE United States Fish and Wildlife Service (USFWS) have recently evaluated the conservation status of the lion *Panthera leo* with particular regard to sport-hunting (<http://www.fws.gov/endangered/what-we-do/lion.html> [accessed 2015-01-19]). The results of this evaluation have led to the formal protection of two subspecies under the Endangered Species Act, classifying *P. l. leo* as endangered and *P. l. melanochaita* as threatened. Together these subspecies apparently represent all of the lions in Africa (Barnett et al. 2014).

Sport-hunting is a legal activity in which the international import/export of trophies is both sanctioned and carefully controlled by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The USFWS found that the sport-hunting of *P. l. melanochaita* “if well managed, may provide a benefit to the subspecies” (<http://www.fws.gov/endangered/what-we-do/lion.html> [accessed 2015-01-19]). Here we explore this statement further, and present data from three long-term *in situ* lion research projects; the Buby Valley Conservation Research Initiative, Savé Val-

ley Conservancy Research, and the Hwange Lion Research Project.

The data presented in this report clearly illustrates the positive conservation benefit that well-managed trophy hunting of lions can have for the species, as well as the importance of hunting in maintaining the wildlife in an area; addressing Point 5 on page 3 of the Federal Fish and Wildlife Permit Application Form (Form 3-200-20) [i.e. “Please be

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



Figure 1: The lions pictured here, known as Winston (*standing*) and Geronimo (*lying*), were both collared in March 2012 when they were the dominant males in the Matombosa area and have been continuously monitored ever since as part of the on-going long-term WildCRU Buby Valley Conservation Research Initiative. In November 2015 Geronimo, who was approximately 9 years old, died after succumbing to injuries sustained from fighting with another male. Winston, also 9 years old, has since lost his dominant status, lost his territory to two 4.5 year old males, become nomadic and avoids contact with other males. As of this report being written, the recent litter of cubs that both Winston and Geronimo sired are still alive.

Most importantly, since July 2013 there has been a continuous self-imposed internal reform of the lion hunting industry in Zimbabwe that is actively participated in and supported by all of the relevant stakeholders, including; the Zimbabwe Parks and Wildlife Management Authority

(ZPWMA), non-governmental organisations, professional hunters, safari operators, scientists and researchers.

Here we discuss the results of this process in terms of robust evidence regarding the sustainability and self-regulation of lion hunting in Zimbabwe.



Figure 2: Winston and Geronimo's cubs.

LIONS – *Panthera leo*

The IUCN Red List have recently reclassified lions as Vulnerable (remaining as such since 1996; IUCN 2015), estimating that there are between 20,000 and 30,000 free-ranging lions left (Bauer et al. 2015a) in less than 25% of their historic range (IUCN 2006). However, this generalised classification does

not take into account an apparent conservation dichotomy: sample subpopulations of lions in Botswana, Namibia, South Africa and Zimbabwe have in fact increased overall (Bauer et al. 2015a). Lions were historically present throughout Africa, some of Europe, the Middle East and Asia (Bauer and Van Der Merwe 2004), but current conservation strongholds remain only in parts of eastern

and southern Africa (Brassine and Parker 2012; Nowell and Jackson 1996). The current lion population estimate for Zimbabwe's major lion areas is approximately 2,600 individuals [Hwange-Matetsi Complex: 750, South Eastern Lowveld: 350, Gonarezhou National Park: 60, Malilangwe: 37, Savé Valley Conservancy: 284, Bulye Valley Conservancy: 500, Mid-Zambezi Valley Complex: 600], though the actual number would be larger if there were data available for the countries minor lion areas that are yet to be surveyed] (ZPWMA 2015).

The lion is a uniquely social felid, forming coalitions of up to nine males associated with one or more female prides that may consist of more than 20 individuals (Macdonald et al. 2010; Schaller 1972). Lions are infamously infanticidal (Schaller 1972), where males will kill unrelated cubs so as to bring the female into oestrus and present an opportunity to sire their own litter, which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2010), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, does not result from sport-hunting when age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004). Moreover, the fission-fusion nature of lion society (Mosser and Packer 2009; Pusey and Packer 1987) means that infanticide may still occur when the dominant males are simply not present there and then to defend their cubs (B. du Preez, pers. obs.).

In the 1990's, lions were successfully reintroduced into private areas in parts of their

former range, where they achieved high reproductive and survival rates (Miller and Funston 2014). However, the resultant population growth inevitably led to the potential problem of overabundance (Funston 2008) and low genetic diversity (Trinkel et al. 2010), with both of these issues requiring active and intensive management (Hunter et al. 2007) and ultimately reducing the conservation value of these lion populations (Miller and Funston 2014). The ability to translocate lions originally facilitated the relief of overpopulation, but as the available areas for relocations were used up, sport-hunting and euthanasia have subsequently become the main methods of lion population control (Miller and Funston 2014).

The lion is the apex predator wherever it occurs (Macdonald et al. 2010), and is an ideal conservation umbrella; being large, charismatic and easily observable (e.g. Williams et al. 2000). Lions are important to commercial wildlife ventures, which risk losing significant market share where they cannot offer them to clients (Lindsey et al. 2007), and are thus prioritised in conservation; exploiting their charisma to attract tourists and raise the funds required in ensuring that wildlife areas remain viable. The lion is also a particularly valuable species in the sport-hunting industry, rivalled only in demand by buffalo *Syncerus caffer* and leopard *Panthera pardus* (Creel and Creel 1997), and are therefore prevalent in private wildlife areas (Packer et al. 2013) where their populations can achieve exponential growth rates given the protection and resources afforded by well-managed operations (Smuts et al. 1978; Loveridge et al. 2007b; Kettles and Slotow 2009; Miller and Funston 2014).

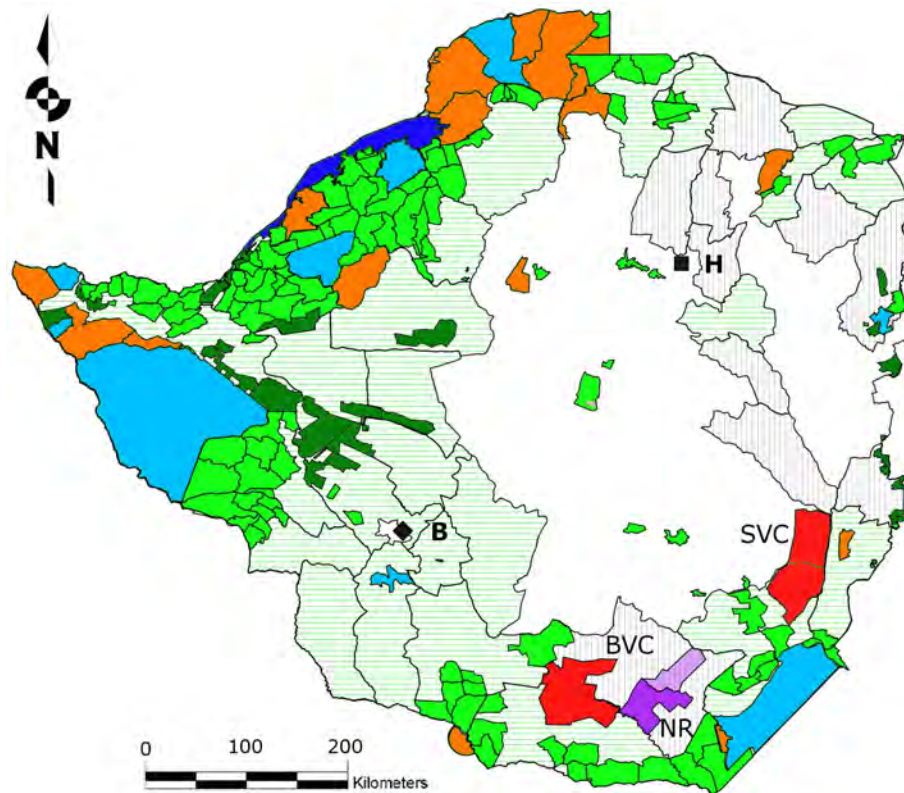


Figure 3: Map of Zimbabwe’s main wildlife areas: [i] National Parks are represented in light blue; [ii] Safari areas are represented in orange; [iii] Forestry areas are represented in dark green; [iv] Community and Private wildlife areas are represented in light green; [v] Communal Land (CAMPFIRE Areas) in which sport-hunting may occur is represented by light green horizontal stripes; [vi] Communal Land in which sport-hunting does not occur is represented by grey vertical stripes. [vii] The Buby Valley [BVC] and Savé Valley [SVC] Conservancies are represented in red. [viii] The Nuanetsi Ranch [NR] on which sport-hunting takes place is represented in dark purple (light purple represents the Nuanetsi Ranch cattle area); [ix] Lake Kariba is represented in dark blue. Harare (the capital city) is represented by a black square and letter ‘H’. Bulawayo is represented by a black diamond and letter ‘B’. Sport-hunting may occur in areas: ii, iii, iv, v, vii & viii

The ability of lions to rapidly increase in abundance is an aspect of their ecology that is often overlooked. Lion populations can achieve exponential growth rates (Miller and Funston 2015; Groom and Watermeyer 2015; du Preez et al. in prep.), and the problems associated with high lion densities fast present themselves and require significant

investment in their solution (Hunter et al. 2007; Kettles and Slotow 2009; Loveridge et al. 2007; Packer et al. 2013; Smuts 1978). Whilst unregulated sport-hunting of lions (in particular that of dominant males and pride females) may result in population declines (e.g. Packer et al. 2010; Packer et al. 2009), restricting offtake to only males over

a certain age (i.e. have already bred and/or are no longer dominant) has no impact on lion population persistence, irrespective of quota size (Whitman et al. 2004). Such is the situation currently facing both the Bulye Valley and Savé Valley Conservancies, where the lion populations continue to grow despite sport-hunting and increasing quotas. Whilst sport-hunting may not alleviate over-population in these areas, it does somewhat offset the cost of keeping lions. Culling of lions may be the only realistic option for controlling numbers in larger areas, as the use of contraceptives is likely to be inefficient and expensive. Because of fears about public sentiment associated with sport-hunting, it has now become common practice for managers to cull excess lions in more than 45 wildlife areas in South Africa to which lions have been introduced, and which resulted in the wasteful destruction of about 200 lions in 2012 (Miller and Funston 2014).

CONSERVATION AND SPORT-HUNTING

There is more land area in Africa conserved for hunting than there is in all of Africa's formally protected areas combined: approximately 1.4 million km², which exceeds the total area covered by national parks by 22% (Lindsey et al. 2007). For wildlife conservation to be successful outside of national parks, these areas must be self-sufficient and able to generate sufficient revenue to cover the considerable costs of protecting the habitat and wildlife therein (Lindsey et al. 2006). Indeed, conservation would benefit from an incentive to utilise land for wildlife rather than the alternatives of livestock grazing, agriculture, and deforestation.

The international trade of lions, including trophies, is controlled by a strict CITES licensing system on the basis that this trade does not endanger the ultimate survival of the population (<https://www.cites.org/eng/disc/how.php> [accessed 2015-01-19]). The positive aspects of sport-hunting as a conservation tool include a focus on males and a low percentage off-take; neither of which generally jeopardise populations, and also suggest that hunting could play a role in population recovery (Leader-Williams et al. 2005).

The recommendation of setting uniform harvest limits, e.g. 1 lion 2,000 km⁻² (Lindsey et al. 2012; Packer et al. 2010), may be overly simplistic, affect the economics of wildlife based landscape use, and disincentivise investment in conservation (Lindsey et al. 2007). A more practical approach to sustainably setting realistic lion sport-hunting quotas could involve using a positive/negative feedback method that calculates a fluid quota per area based on the previous season's performance. Such an adaptive quota management system has already been implemented in Zimbabwe.

ZIMBABWE'S ADAPTIVE LION QUOTA MANAGEMENT SYSTEM

An adaptive quota management system for lion hunting based on the ages of lions hunted was agreed on in July 2013 in Harare, Zimbabwe, during a meeting hosted by the Zimbabwe Parks and Wildlife Management Authority (ZPWMA) and an independent non-governmental conservation organisation. The points system is summarised in Table 1.

Table 1: *Points allocated to hunting blocks arising from the harvest of lions of different ages*

	≥ 6 years	No trophy	5 years old	4 years old	< 4 years	Failure to submit return, or incomplete return
For quotas of ≥3	4	3	3	2	-3	0
For quotas of 2	4	3	3	2	0	0
For quotas of 1	6	3	3	2	0	0
Resultant quota	<i>These points are added up and divided by 3 to yield the quota for next year</i>					

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the system up and running. In 2014 operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015. The 2015 lion hunt results would thus also determine the 2016 quota.

Results of the Adaptive Lion Quota Management System

In 2015 there was a marked increase in the age of lions hunted in Zimbabwe as a whole. Notably, only one lion of <4 years of age was hunted and the large majority of lions were 5 years or older (Figure 4). In 2013, only 28% of the lions hunted were 5 years or older, in 2014 that figure had risen to 49% and in 2015 to 77.3% (Figure 5). The proportion of lions hunted that were less than 5 years of age dropped overall between 2013 and 2015 (Figure 6). For this achievement, credit is due to the hunting community for showing greater selectivity of harvest. A word of caution however, is that the majority of lions hunted were on the cusp of 5 - 6 years of age and were not older than six years. Restricting hunting to individuals that are at least

six (and preferably older) is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

In 2015 the Zimbabwe national lion hunting quota was set at 85 lions. Of this 85, only 39 were hunted in 2015, and based on the resultant score from aging the trophies, and the fact that operators chose not to hunt lions of inadequate age (see Figures 4, 5 & 6), the recommended quota for 2016 was set at 75 [Harare 2015-11-11]. (The Rural District Council areas in which lions occur are currently exempted from the age restrictions, as was agreed upon at the 2013 lion management meeting in Harare, as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognising the potential negative impacts the species has on the livelihoods of livestock farmers).

Using these figures and estimating the average value of a lion safari at approximately US\$ 80,000 then a 50% offtake (35 lions) would generate US\$ 2,800,000 annually. If management costs are approximately \$150 km⁻² (V. Booth, pers. comm.), then the lion safaris alone can support 18,600 km⁻² of wildlife habitat in Zimbabwe.

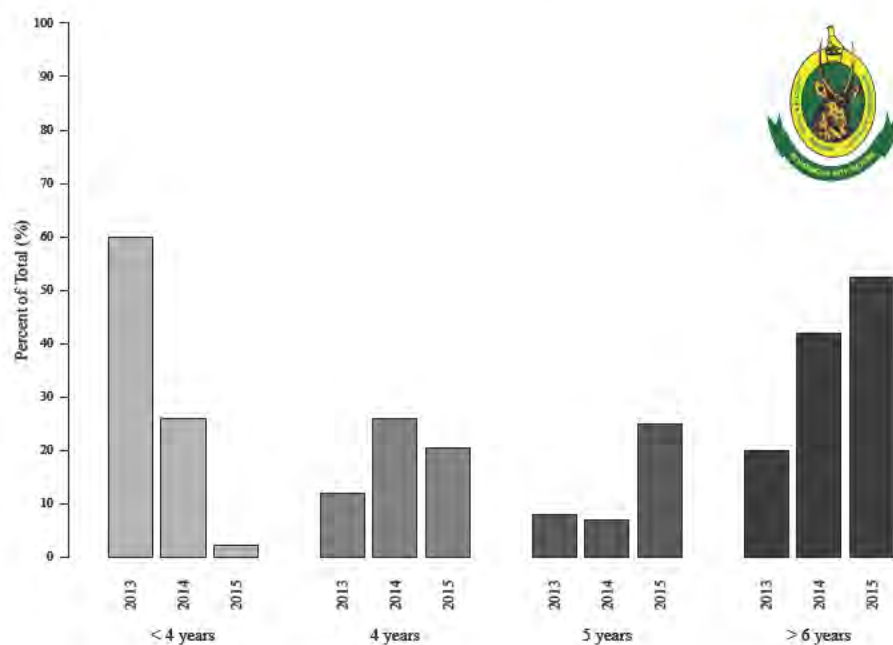


Figure 4: The percentage of lions hunted in each age class in 2013, 2014 and 2015 in Zimbabwe.

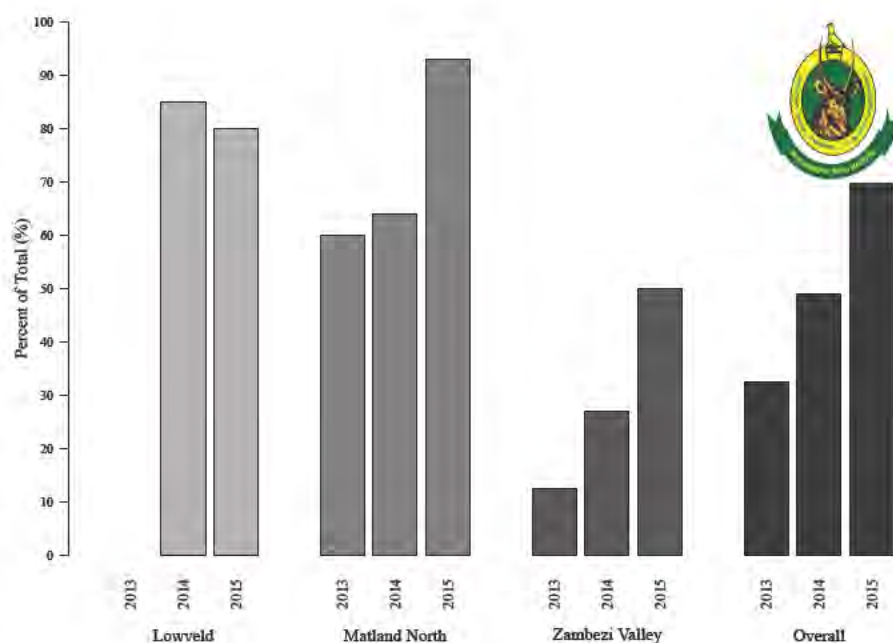


Figure 5: The proportion of lions hunted that were 5 years or older in the three main lion-hunting areas of Zimbabwe.

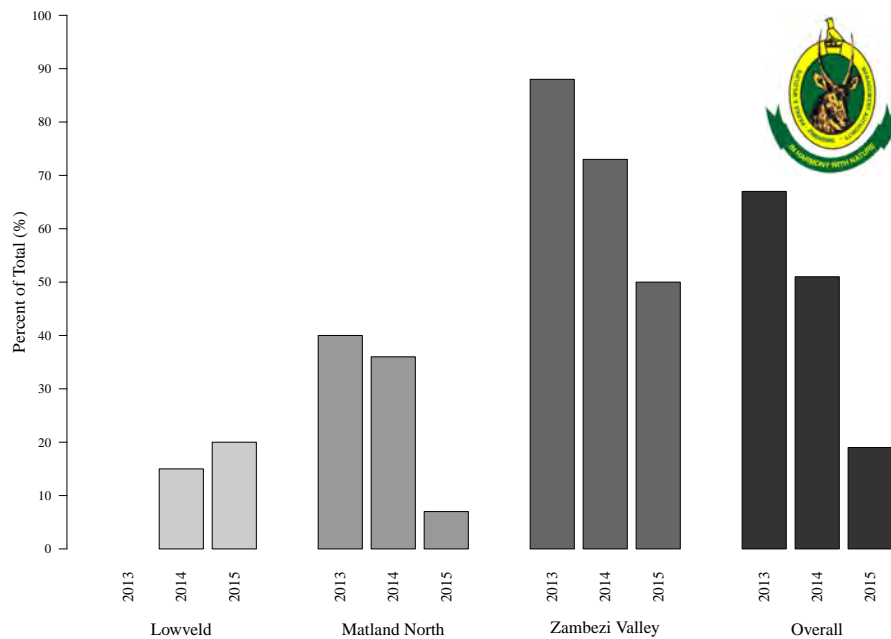


Figure 6: The proportion of lions hunted that were less than 5 years of age in the three main lion-hunting areas of Zimbabwe.

Table 2: *Human and Lion Conflict (2009 - 2011) in Zimbabwe, including human mortality caused by lion (CAMPFIRE Association, 2012)*

District	Total incidents	Livestock killed	People Injured	People Killed
Hurungwe	5	1	2	2
Chiredzi	25	136	0	0
Mbire	5	7	0	5
Binga	9	39	0	0
Total	44	183	2	7

Human-Lion Conflict

The lion is a flagship species and powerful symbol of Africa; yet living with lions poses hardships for many communities (e.g. Table 2). In some areas, the lion is a major predator on domestic livestock, inevitably leading to conflicts with local herders. Both sides suffer in this situation.

Outside of protected areas, the lion's prey base is much reduced, which results in relatively greater chance of encountering live-

stock. Co-existence of lions with people may be enhanced by giving value to lions through tourism and hunting promoted in communal lands under the Communal Area Management Programme for Indigenous Resources (CAMPFIRE). This hunting contributes to the conservation of lions via the financial revenue generated, which is ploughed back into conservation of the resource and empowers local communities to invest in their own rural development programs.

THE BUBYE VALLEY CONSERVANCY

History of the Buby Valley Conservancy

Towards the end of the nineteenth century, the Liebig's Extract of Meat Company (LEMCO) founded an extensive cattle ranch in the Zimbabwean lowveld, to the detriment of the indigenous wildlife that was initially eliminated because of competition for grazing with the livestock, as well as a risk of disease transmission from buffalo and wildebeest *Connochaetes taurinus*. As their natural prey base became depleted, the predators were subsequently persecuted when they began to prey on the livestock. Some wildlife persisted in small pockets of remote habitat, however lion, elephant *Loxodonta africana*, buffalo and rhinoceros *Diceros bicornis* [black] & *Ceratotherium simum* [white] were all completely eradicated. A monoculture of cattle dominated the landscape and impacted on the environment for the better part of a century.

Then, in 1992, Zimbabwe suffered one of the worst droughts on record, a relatively short time after the devastating one of 1983 that LEMCO was still trying to recover from. The frequency and severity of the droughts effectively reduced confidence in the economic viability of cattle ranching in the area, and the Buby Valley Conservancy was subsequently founded in 1994 with the realisation that endemic wildlife, which are better adapted than livestock to cope with the local climate, could be successfully commercialised (Child 1988; Bond 1993).

The conversion from cattle ranching back to a wildlife area was neither straightforward

nor cheap, requiring a significant initial investment and annual running costs. In just 20 years of operation the Buby Valley Conservancy now protects the world's third largest black rhinoceros population, one of Zimbabwe's largest lion populations, a large and increasing elephant population, and abundant game.

Sport-hunting is an essential step in converting areas that were previously dedicated to livestock farming into non-consumptive tourism areas (Child 1993), and was fundamental to the formation of Buby Valley Conservancy and allowing the wildlife populations to recover. The Samanyanga area of the Buby Valley Conservancy, probably the most scenic section, was originally set aside for non-consumptive photographic tourism, but made an annual loss for several years, before, largely due to Zimbabwe's land reform program and resultant instability in the country, it was reverted back to sport-hunting as the only practical and economically viable option (K. Leatham, pers. comm.). Sustainable sport-hunting provides the sole economic incentive to continue operating the Buby Valley Conservancy as a wildlife conservation area.

Buby Valley Conservancy Community Support

The Buby Valley Conservancy donates over 45 tonnes of meat from sport-hunting to the local communities each year. This meat donation is worth over US\$ 100,000 per year, and the communities are free to decide how they use it. In addition to this, the Conservancy also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda and Jopempe. The local community thus

sees a direct benefit from the wildlife on the Bulye Valley Conservancy, but is also empowered by job opportunities created both with these special projects, as well as on the Conservancy. A summary of the Bulye Valley Conservancy community support effort between 2011 and 2015 is provided in Table 4.

Bulye Valley Conservancy Lion Monitoring and Management

After originally being eradicated by cattle ranchers in the area, 13 lions were reintroduced to the Bulye Valley Conservancy in 1999, and four young males broke into the Conservancy that same year. From the original 17 animals present in 1999, the Bulye Valley Conservancy lion population was estimated at approximately 280 individuals in 2009 when robust population surveys were initiated by a research team from the University of Oxford Wildlife Conservation Research Unit (WildCRU), and this population has continued to grow. Today it is estimated that there are over 500 lions on the Bulye Valley Conservancy (du Preez et al. 2015). The exponentially increasing Bulye Valley Conservancy lion population currently exists at one of the highest

densities in Africa (~ 0.187 lions km^{-2} : du Preez et al. 2015; Figure 7), greater than that of the Serengeti, Tanzania (0.100 lions km^{-2} : Pusey and Packer 1987; Spong 2002), Selous, Tanzania (0.080 - 0.130 lions km^{-2} : Creel and Creel 1996, 1997), Kruger National Park, South Africa (0.096 - 0.112 lions km^{-2} : Mills 1995), and Hwange National Park, Zimbabwe (0.027 lions km^{-2} : Loveridge et al. 2007). This equates to one of the largest contiguous lion populations in Zimbabwe.

Bulye Valley Conservancy Lion Hunting

The Bulye Valley Conservancy offsets the cost of lion predation on its wildlife via sport-hunting of the species, and which began in 2002. In 2014, the lion hunting quota allocated to the Bulye Valley Conservancy by ZPWMA was 10 individuals. Based on the fact that the entire quota was harvested and that maximum points were scored for each individual trophy (more than six years in age), the allocated quota was raised to 13 lions for 2015. Only 12 out of 13 lions were hunted in 2015 due to a late cancellation; nevertheless eight lions over six years old and four lions of five years old were harvested and the resultant points justifying a quota of 15 lions for 2016.

Table 3: *The Bulye Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	1	2	3	2	2	2	3	3	5	8	12	10	10	13
Quota taken	1	2	3	2	2	2	2	3	5	8	12	10	10	12
Percentage success	100	100	100	100	100	100	67	100	100	100	100	100	100	92

Note that while the lion hunting quota for Zimbabwe has been voluntarily reduced by the national steering committee, the Buby Valley Conservancy lion hunting quota has been successively raised twice

based on both hunt success and age of lions hunted and the resultant points scored under the national adaptive quota management system (Table 3).

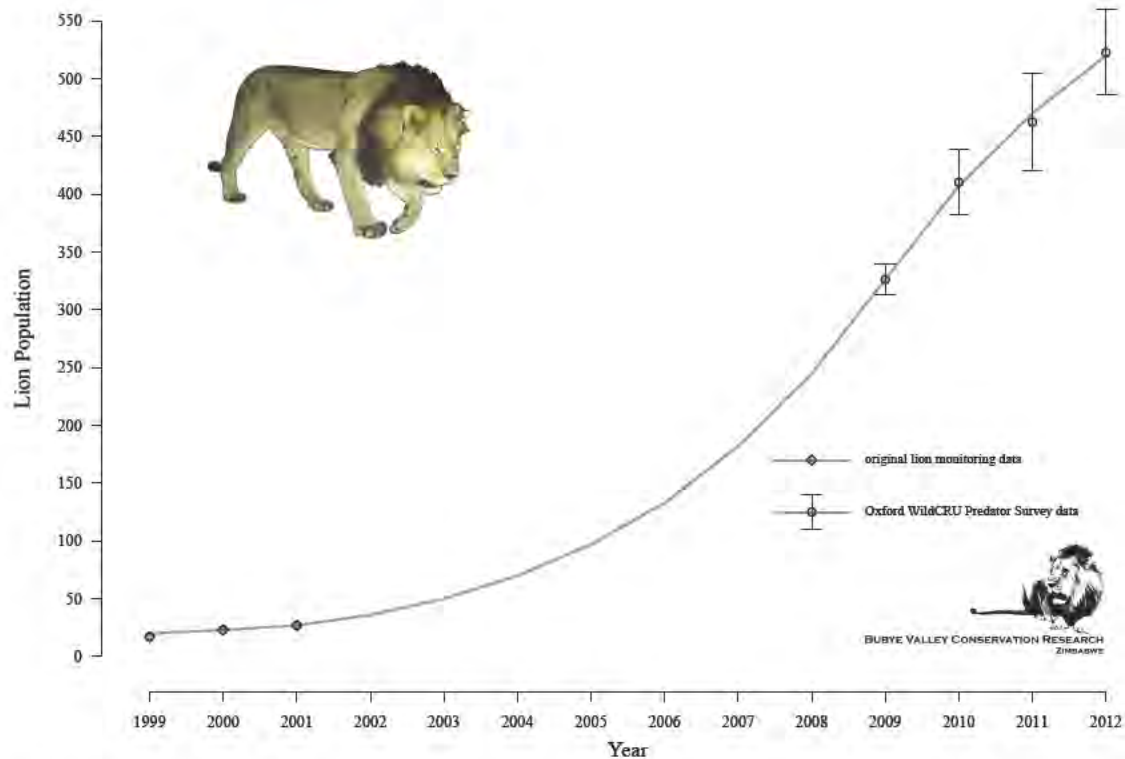


Figure 7: The Buby Valley Conservancy lion population has grown exponentially since the reintroduction of lions in 1999. Diamonds represent the known lion abundance from monitoring of the original individuals introduced; Points indicate lion abundance calculated from spoor transect analyses; error bars represent the standard error of the mean.

Table 4: *Summary of the Buby Valley Conservancy support to the surrounding local communities (2011 - 2015)*

Boreholes:	<ul style="list-style-type: none"> - 1 x Jompembi Village 2 - 1 x Penemene - 1 x Jompembi Village 4 - 1 x Nyimani village (Mwenezi) - 1 x Driehoek School - 1 x Mgaladivha School - 2 x Mtetengwe to supply water to the clinic site - 2 new bush pumps (complete) purchased and installed at Village 2 & Village 3 and troughs built at both sites <ul style="list-style-type: none"> <i>Drinking trough for cattle built at Village 2 borehole</i> <i>All boreholes equipped with new bushpumps, piping and cylinders</i> <i>Boreholes at Village 3, Mtetengwe, Mdzwiti, Vumani and Penemene and Makado Police post repaired and maintained</i> <i>All new piping and pumps etc. are supplied by BVC</i>
Buildings:	<ul style="list-style-type: none"> - Mtetengwe Clinic's main building built - 3 x F13 staff houses built <ul style="list-style-type: none"> <i>Clinic and House fenced - everything funded and built by BVC</i> <i>The clinic is a standard large Government clinic - male & female wards + maternity ward and outpatients</i> <i>Storerooms, offices etc. also built</i> <i>All houses and buildings are electrified, painted and supplied with running water</i> - Mtetengwe School school office block and staff room built and painted <ul style="list-style-type: none"> <i>All classroom windows repaired and the schools second borehole repaired.</i> - Secure engine house was built at the second borehole site - Borehole equipped with BH15S mono pump unit driven by a rebuilt Lister LT 1 engine - 5000 litre header tank and stand erected - new 5000 litre header tank purchased and fitted - pipeline laid to connect the borehole to the clinic - another pipeline connected to the same borehole to supply the Mtetengwe school with fresh water - New coldroom and refrigeration unit purchased and fitted at the Lutumba butchery <ul style="list-style-type: none"> <i>Part of aid program to get the Beit Bridge RDC self funding projects up and running</i> - New coldroom and refrigeration unit was purchased and fitted at the Rutenga butchery <ul style="list-style-type: none"> <i>Part of aid program to get the Mwenezi RDC self funding projects up and running</i>
Meat Donations:	<ul style="list-style-type: none"> - BVC donates meat on a regularly basis to the Mwenezi Orphanage - Numerous donations of meat were made to support school sports days & speech nights/prize giving events <ul style="list-style-type: none"> <i>Both Beit Bridge & Mwenezi districts</i> - 1600 kgs of meat has been donated each month since July 2011 to a Maranda trust <ul style="list-style-type: none"> <i>Administered by Chiefs and local headmen</i> <i>Excess meat sold and funds used for community projects</i> <i>Classroom roof replaced at Vhongwe school</i> <i>4 new classroom blocks constructed at other schools using funds from these monthly allocations</i> - 1000 kgs of meat per month is been donated to Beit Bridge communities since April 2014 - 1000 kgs of meat per month is been donated to Mwenezi communities since August 2013
Miscellaneous:	<ul style="list-style-type: none"> - Sports uniforms for the Penemene school team purchased (\$2600) <ul style="list-style-type: none"> <i>Sports uniforms required for inter-schools sports</i> - Transport the soccer teams representing Mgaladivha, Jompembi and Tongwe <ul style="list-style-type: none"> <i>To Lutumba for the inter-school competitions</i> - 2 sets of soccer goal posts & 2 sets of Netball poles were made for Mgaladivha School <ul style="list-style-type: none"> <i>New soccer field graded by BVC</i> - 2m security fencing supplied to Penemene School - Second hand door and window frames donated to Mapiri school (ex Mazunga School) - 1 new 3 1/2 " rod pump cylinder was purchased and fitted to the Vumhani borehole <ul style="list-style-type: none"> <i>All repairs to b/holes in the Vumhani area are done by BVC</i> - 26 bags of cement were donated to Mgaladivha School - Fencing donated to the Mgaladivha School - Supplied 10 x 5/8" mono shafts for the Botalele Clinic (Maranda) borehole - Water supply to Mlelezi Clinic - 400 m pipeline laid to supply the Nyimani Villarge's cattle with water <ul style="list-style-type: none"> <i>3.5 m drinking trough build for this same project</i> - 60 bags cement donated to the Welkom for repairs to a dam wall - 6 loads of riversand and 20 cement donated to Vumani Preschool - Various school renovations in both the Beit Bridge and Maranda areas
Current Projects:	<ul style="list-style-type: none"> - Construction of a School admin block at Mgaladivha School - Supply of 24 loads of riversand to Mdzwiti School (value \$1200) - All roofing materials supplied to Mdzwiti School - Supply roofing materials, cement, all window and door frames for Vumani Preschool

THE SAVÉ VALLEY CONSERVANCY

History of the Savé Valley Conservancy

The Savé Valley was a wildlife-rich wilderness until the early 1900's, when the first cattle ranching initiatives started in the area. The establishment of Devuli Ranch and Angus Ranch in 1920 paved the way for seven decades of commercial cattle ranching in the area we know today as the Savé Valley Conservancy. Roads were cut, fences erected and an everlasting 'battle' ensued against the wildlife, especially against all predators.

The large predators, especially lions, were virtually eradicated (Pole 1999). However, by the late 1980's, declining range productivity, depressions and droughts forced the landowners to consider alternative options. Around that time, empirical evidence of the competitive advantage of wildlife over livestock began to emerge (Child 1988; Bond 1993), especially in arid areas (Jansen et al 1992; Cumming 1993), and wildlife was finally given serious consideration as a viable land use option.

In 1989, a proposal was drawn up (du Toit 1989) to turn what was then the Sabi Valley Intensive Conservation Area into a wildlife conservancy. The plan was to create a single large wildlife area, especially for the re-establishment of endangered species and overexploited species, with cattle remaining the primary income generator. The Savé Valley Conservancy was constitutionally inaugurated in June 1991, and following the severe 1991/1992 drought, wildlife ranching became the primary land-use. At the time this was the largest private wildlife conser-

vancy in the world (3,410 km²).

The conservancy members then restocked the wildlife, removed all internal fencing, erected a common perimeter fence and developed effective security systems. A double, electrified, veterinary-approved fence was completed in 1995, and the following decade saw a massive investment in wildlife re-stocking and security systems.

Sport-hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, re-stock game, and improve security, especially because of the significant numbers of black rhinoceros now found there. Gradually, some of the ranchers shifted more into ecotourism. One property, Senuko Ranch, completed a 16 bed up-market lodge with a view of marketing non-consumptive safaris, offering game drives and bush walks and specializing in rhino walks and African wild dog *Lycaon pictus* den visits. Lodge occupancy rose from 0% in 1996 to 62% by the end of 1999.

However, the Zimbabwean land reform program, which was initiated in February 2000, soon made a strong negative impression in the international community, and resulted in travel bans and warning from most of Zimbabwe's source markets. This, together with the political instability meant that the wildlife industry and ecotourism industry collapsed over-night: sport-hunting became the only economically viable land use option, and has remained the only tangible source of income to the landowners of the Savé Valley Conservancy. In the case of the Senuko Lodge, for example, the land reform program resulted in a 98% cancellation of

the confirmed bookings. After four years of seeking alternative markets, the lodge could achieve no higher than 17% occupancy, and in 2005 moved back into a hunting-based operation.

A more direct impact of the land reform program for the Savé Valley Conservancy was the loss of 33% of the area of the conservancy to invading subsistence farmers (Lindsey et al 2008). The loss of land was catastrophic and the related pressure from wire snare poaching was extreme. In the following eight years (2001 to 2009), 10,520 illegal hunting incidences were recorded, 84,396 wire snares were removed and at least 6,454 wild animals killed (Lindsey et al. 2011).

Savé Valley Conservancy Community Support and Anti-Poaching

In 2012, conservancy members provided over US\$ 100,000 worth of support to adjacent villages or farmers in the resettled areas. Assistance included drilling boreholes, maintaining boreholes, dredging of dams, assisting with building projects in clinics and schools, assisting with repairs, maintenance and materials at schools, education initiatives, school field trips, provision of computer equipment in schools, craft programs and regular donations of meat.

Moreover, the conservancy recently entered into a mutually dependent agreement with the Chiefs representing the communities surrounding the Savé Valley Conservancy. The agreement links the communities to the Natural Resource Utilisation that occurs through the business operation of the conservancy and opens up opportunities for the local indigenous populations to share in any wealth creation. This agree-

ment strengthens relations between the conservancy and the surrounding local communities and creates an environment that helps to protect, conserve and sustain the natural assets of the area. The hunting tourism of the conservancy is currently the only form of income by which the surrounding communities can benefit. Revenues from trophy lion hunting constitute a significant portion of inflow and thus an important part of the community benefits. Any reduction would seriously jeopardise the growth of this infant positive relationship and community empowerment initiative.

The Savé Valley Conservancy is thus pioneering private-community partnerships in Zimbabwe, and trade restrictions on lion trophies will indirectly adversely affect these already seriously impoverished communities through a reduction in available income to share with communities. This is very likely to have a knock on impact on the lions themselves with a significantly reduced tolerance and an increase in retaliatory poisoning of lions for livestock predation. Without a demonstration of income from lions, the political pressure from the surrounding communities to remove them from the conservancy altogether will be a challenge to resist.

Savé Valley Conservancy Lion Monitoring and Management

After the Conservancy was formed, and persecution stopped, lions, mainly males, recolonized the area and their numbers started to increase in the late 1990's / early 2000's. Few lionesses were observed until 2003, when small family groups and male-female pairs were seen, and by 2004 - 2005 there were some reports of cubs. During this period 13

lions were also reintroduced into the Savé Valley Conservancy. After an initial lag phase the lion population on the Savé Valley Conservancy has increased dramatically and at present is growing exponentially (Figure 8; Groom and Watermeyer 2015).

Monitoring of the lion population began in 1999 (Pole 1999) with track index or call-up surveys being conducted sporadically until 2006. From 2007 to present, annual conservancy-wide track index surveys have been conducted using a standardized methodology (Groom and Watermeyer 2015). The resulting population estimates were verified in 2011 by a baited lion call-up survey and a collation of managers' estimates, all of which provided similar results.

Prey availability models (Hayward et al. 2007) suggest that the carrying capacity for the lion population in the Savé Valley Conservancy is approximately 271 lions. The population estimate for 2015 was 284 lions, suggesting lions have reached their ecological carrying capacity, even whilst being responsibly hunted.

A professional lion management plan was commissioned by the conservancy in 2011 (Funston 2011), to provide the Savé Valley Conservancy members with a science-based

plan to help them ethically and sustainably manage their lion population. This plan specifically advocates the use of hunting as a conservation management tool. It also demonstrates willingness by the conservancy to guide their lion management based on science and advice from professionals.

Savé Valley Conservancy Lion Hunting

Lions have been hunted in the Savé Valley Conservancy since 2002, although that was largely for removal of problem animals. Hunting began properly in 2005 with quotas increasing annually to a maximum of seven per year from 2009 onwards (Table 5), with the quota being raised to ten for 2016 based on trophy ages.

Despite offtakes of lions through sport-hunting, the lion population has continued to increase in the Conservancy. The revenue generated from hunting lions has enabled landowners to invest in proper land management, anti-poaching, water provision and fence maintenance, all of which benefit the lion population (especially as lions seem to be vulnerable to being caught in wire snares; Becker et al 2013; R. Groom, pers. obs.).

Table 5: *The Savé Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	5	5	1	3	3	4	6	7	7	7	4	2	3	5
Quota taken	1	0	1	3	3	3	3	6	5	3	4	1	3	5
Percentage success	20	0	100	100	100	75	50	86	71	43	100	50	100	100

Sport-hunting of lions brings considerable revenue to the Conservancy, revenue that is vital for the continued functioning of the area for wildlife conservation. Without the costs of lions being offset by the income

from sport-hunting, landowners cannot reasonably be expected to tolerate such high lion densities, and their numbers would have to be reduced significantly.

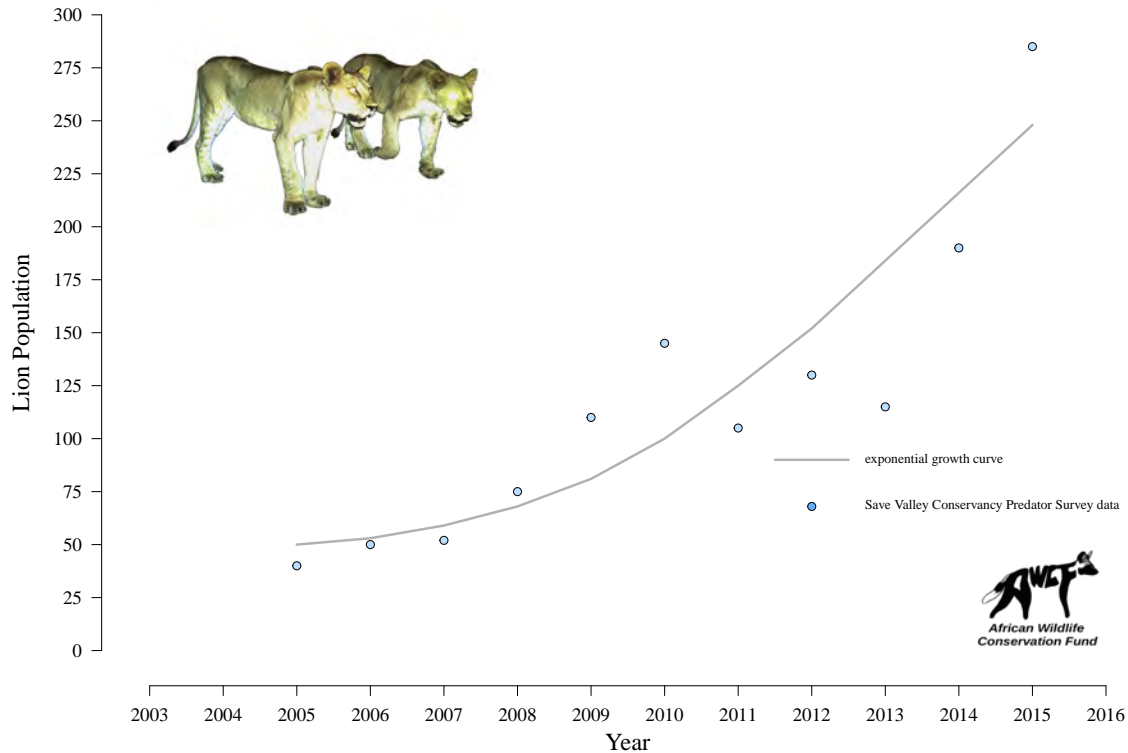


Figure 8: The Savé Valley Conservancy lion population, like that of the Buby Valley Conservancy, has grown exponentially. Points indicate estimated lion abundance calculated from field surveys; the line represents the exponential growth curve.

THE PROS AND CONS OF CONSERVING LIONS

The saturation of lions in wildlife areas on both state and private land is positive for their future conservation security; but it is also critical to that of incidentally conserved endangered species, such as both species of rhinoceros on private wildlife conservancies in Zimbabwe (Lindsey et al. 2009; Suzuki 2001), which benefit from the same resources and protection that are incentivised and provided by the revenue generated from sport-hunting. The Bulye Valley Conservancy now boasts the world's third largest black rhinoceros population (N. Anderson [Lowveld Rhino Trust], pers. comm.), which is classified as Key 1 by the African Rhino Specialist Group and means that this population is considered key to the overall survival of the species. The Save Valley Conservancy has the second largest black rhinoceros population in Zimbabwe after Bulye. These are not coincidences. These rhinoceros (and other endangered species, such as wild dog) strongholds are the result of the incidental conservation benefits derived entirely from sport-hunting activities - there are no photographic tourists visiting either the Bulye Valley or Save Valley Conservancies, and the rhinoceros are not hunted. Having rhinoceros on the land therefore generates no revenue - and in fact there is a significant cost associated with protecting these animals; US\$ 590,000 (not including incentive and reward bonuses donated for these purposes) was spent on anti-poaching by the Bulye Valley Conservancy during 2015 (K. Leathem, pers. comm.), and US\$ 546,000 is spent annually on anti-poaching by the Save Valley Conservancy (Lindsey et al. 2012). This expense is covered mainly

by the revenue generated by sport-hunting with additional donations from the clients; and most importantly, the habitat for the rhinoceros is preserved by maintaining the land as a conservation area, as opposed to converting it into agricultural or grazing land for example.

However, the high densities of lion populations achieved within commercial wildlife areas have the potential for intense intraguild persecution. Lions are aggressively competitive, and research on the relationship between lions and leopards has shown that high densities of lions can negatively affect leopard population density, demographic structure, cub survival, and spatial ecology down to even the step-wise decisions that leopards make regarding habitat use and behaviour based on both the actual and potential risk of encountering lions (du Preez 2014; du Preez 2015). Leopards are a generalist species that are able to cope with persecution by adapting their behaviour and ecological niche, and even they suffer under a burgeoning lion population; ecological specialists and endangered species, such as cheetah *Acinonyx jubatus* and wild dog, do not fare nearly as well under such intense competitive pressure. In fact, competition with lions has been directly linked to reductions in cheetah (e.g. Durant 1998, 2000; Laurenson 1995) and wild dog (e.g. Creel 2001; Creel and Creel 1996; Vucetich and Creel 1999) densities, both of which face local extinction where lion abundance, and the respective level of persecution, is high. Excessive lion densities may also result in population declines of ungulate prey (e.g. Wegge et al. 2009). It is vital to holistic conservation that wildlife managers can understand and deal with the level of impact that lions exert on other species; particularly those that

are elusive difficult to observe, and which face decline if not carefully monitored. To this end, a conservation research initiative in partnership with WildCRU was established on the Buby Valley Conservancy in 2009, and research conducted on the Savé Valley Conservancy since 2007.

Based on the number of kills made (du Preez et al. in prep.) and the current value of the meat (K. Leathem, pers. comm.),

the Buby Valley Conservancy lion population consumes hundreds of thousands of dollars worth of prey each year. These lions are mainly tolerated because of their ability to generate the revenue that helps to offset this expense - although it is estimated that economically it is still not worth keeping the lions whose cost outweighs their value (Funston et al. 2013).

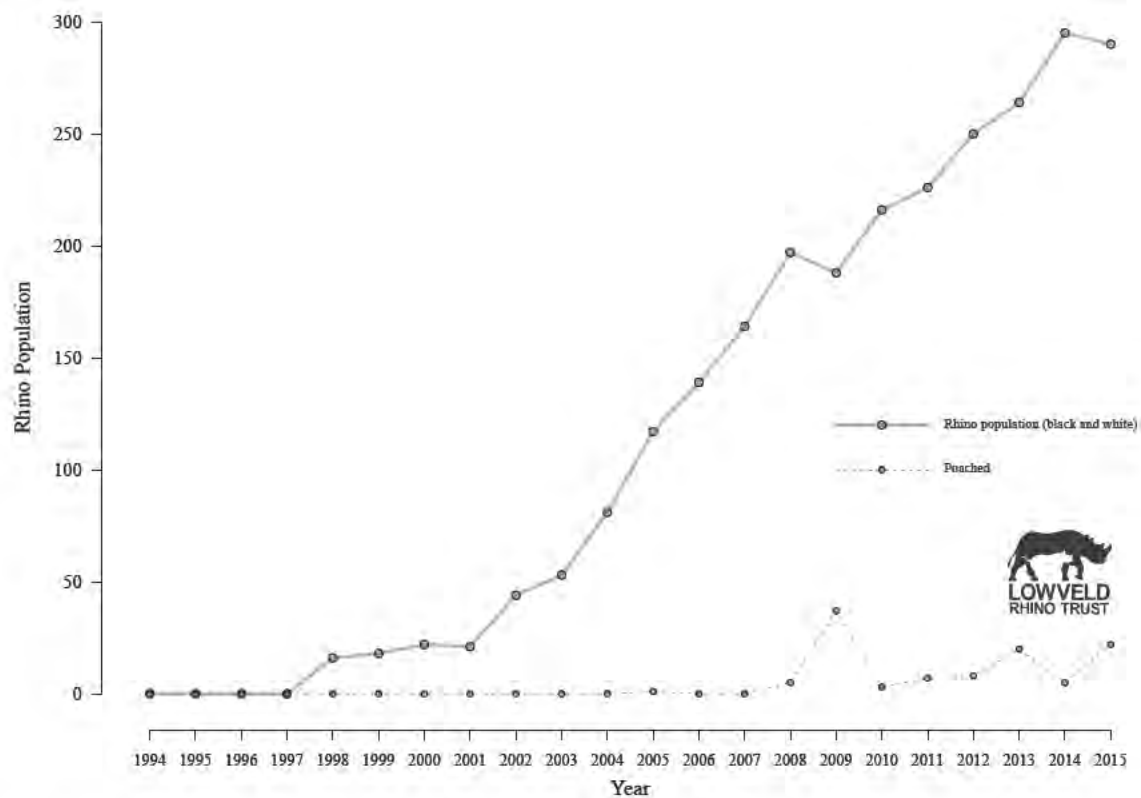


Figure 9: The Buby Valley Conservancy black rhino population is rated as Key 1 by the African Rhino Specialist Group which means that the population is considered key to the overall survival of the species.

WHERE THE MONEY GOES: THE FINANCES OF LION SPORT-HUNTING AND REINVESTMENT IN THEIR CONSERVATION

Break-down of the finances involved in a typical lion hunt on the Buby Valley Conservancy:

Lion Trophy fee: US\$ 42,000

Lion Hunt Daily rate: US\$ 2,950 day⁻¹

(Minimum lion hunt duration: 18 days [*total daily rate of US\$ 53,100 lion hunt⁻¹*])

Additional costs include:

ZPWMA scout

Observers

Bait used

Other trophy species taken during the lion hunt, etc.

[*These additional costs average approximately US\$ 6,500 lion hunt⁻¹*]

BUBY VALLEY CONSERVANCY - LION SPORT-HUNTING REVENUE GENERATED (2015):

$$\begin{aligned} & ((18 \text{ days} \times 2,950 \text{ day}^{-1}) + 42,000 \text{ trophy fee} + 6,500 \text{ additional costs}) \times 12 \text{ lions} \\ & = \text{US\$ } 1,219,200 \end{aligned}$$

Lion sport-hunting therefore represents approximately 33.9% of the Buby Valley Conservancy's total annual revenue generation (which includes post-hunt meat and hide sales).

All of the revenue generated from lion sport-hunting on the Buby Valley Conservancy has gone back into the running costs of the Conservancy, which is all part of conservation, and which includes: anti-poaching and fence monitoring and maintenance (approximately US\$ 506,000 year⁻¹), research (approximately US\$ 34,700 year⁻¹ not including client and sponsor donations), and community support assistance (approximately US\$ 210,000 year⁻¹).

[*No profit after costs has been declared, nor dividends taken by shareholders, since the Buby Valley Conservancy was formed in 1994. All revenue generated to date has been spent on running costs, improvements and restocking.*]

DISCUSSION

Here we have shown that since their reintroduction after historical eradication, both the Buby Valley and Savé Valley Conservancies' lion populations have increased exponentially - not despite sport-hunting, but because of sport-hunting and the incentive it provides for protection.

The success of the Buby Valley and Savé Valley Conservancies, in terms of both of their hunted lion and non-hunted rhinoceros populations, may also provide the motivation for other areas in the country to sustainably manage their wildlife resource. A case in point is the Nuanetsi Ranch, a wildlife area that is also a legacy of failed cattle ranching, located almost directly between the Buby Valley and Savé Valley Conservancies in Zimbabwe (Figure 3). At present there is a single lion on the Nuanetsi Ranch but management is not able to justify introducing more due to the current uncertainty over the future of lion hunting (B. Lees-May [Nuanetsi Ranch Conservator], pers. comm.). The Nuanetsi Ranch is a wildlife area of 1,489 km², and could conceivably sustainably hold between 201 and 278 lions (based on the most recently estimated lion densities of the Savé Valley [0.135 lions km⁻²; Groom and Watermeyer 2015]; and Buby Valley [0.187 lions km⁻²; du Preez et al. 2015] Conservancies respectively). However, the Nuanetsi Ranch has invested in building up an abundant wildlife population, which is sport-hunted, and the management will not risk losing a significant amount of valuable game, that could otherwise be sold as trophies or meat, to a species from which it can not recuperate lost revenue, and instead that requires further investment in control measures (B. Lees-May [Nuanetsi

Ranch Conservator], pers. comm.).

Between 2005 and 2015 the United States market has represented 70.4% of the total Zimbabwean lion sport-hunting industry (http://trade.cites.org/en/cites_trade/ [accessed 2015-01-19]), though in reality it constituted over 90% for both the Buby Valley and Savé Valley Conservancies. If this market was effectively lost due an inability of prospective clients to import their trophies, based on the economics involved it would become unviable to continue managing the Buby Valley Conservancy as a wildlife area in its current form, and lions would either have to be re-exterminated, or at least severely reduced via culling; or else what is the largest privately owned wildlife area in the world would be converted back into a cattle ranching area (K. Leathem, pers. comm.). This is the reality of any business, in that it needs to cover costs and pay staff and cannot run at a loss for luxury of conservation. Child (1993) states “*A refusal to treat wildlife in the same way as other resources and maintenance of centralised protectionist management prejudices its survival. Only by raising its commercial value will wildlife be able to compete for space on the scarce African landscape. Trade bans which detract from wildlife’s commercial value prejudice its chances of survival in the long term*”.

Although the USFWS understandably categorises lion conservation by country for simplicity, rather than individual properties, the Buby Valley and Savé Valley Conservancies currently and deservedly hunt more than a third of the total Zimbabwean lion quota between them. Here we have shown that this sport-hunting does not negatively affect the lion population, which remains in positive growth despite off-take. In addition

to this, other areas, such as the Nuanetsi Ranch, could be incentivised to invest in lion conservation if the ability to sustainably utilise the lions as a resource was guaranteed.

The USFWS identified five primary factors that threaten lion survival in the wild, namely: habitat loss; loss of prey; retaliatory killing due to increased human-lion conflicts; inadequate regulatory mechanisms; and weak management of protected areas (<http://www.fws.gov/endangered/what-we-do/lion.html> [accessed 2015-01-19]). Each and every point on this list, which notably does not include sport-hunting, supports the fact that incentivising tolerance for lions through sustainable use would enhance the species' overall survival.

As responsible conservationists, we are not arguing against tight regulation of sport-hunting, especially with regard to sensitive species such as lions, and we support the need for transparency and accountability within the industry. However, this reform is a process being driven from within, as any indiscretion is an affront on all stakeholders. For example, long-term lion monitoring by WildCRU in Hwange National Park (HNP), Matabeleland North, Zimbabwe, documented a 'vacuum effect' and reduction in male lion density in the Park as a result of sport-hunting in the surrounding areas (Loveridge et al. 2007). A result of this research was the recommendation that ZPWMA implement a hunting moratorium in western Zimbabwe, which was accepted and enforced from 2005 to 2008 (Davidson 2009). Subsequent monitoring of the HNP lion population showed that the perturbation effects caused by sport-hunting were

reversed during the moratorium, and sport-hunting was reinstated at a reduced, more sustainable quota (Davidson 2009). This example demonstrates both the relationship between independent researchers and ZPWMA, and that the research assists ZPWMA in robust decision making. This study has also shown that the lion population was able to recover quickly, and that a blanket-ban would have been as unnecessary as it would have been detrimental to overall lion conservation in the country.

In addition to the self-imposed hunting moratorium in the Matabeleland North district, Zimbabwe has voluntarily stopped sport-hunting of any lioness. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season even began, and which was resultantly attributed to poor quality trophies and young animals being hunted, has also been abandoned. The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have minimal ecological impact, being old individuals that are no longer contributing to the gene pool nor protecting cubs.

The IUCN Red List lion conservation status has remained unchanged for 20 years even in the face of Africa's ever-changing landscape. Despite fears that lion abundance is decreasing overall, in southern Africa it is in fact increasing (Bauer et al. 2015b).

CONCLUSION

Given the evidence presented, the arguments against sport-hunting would appear to be based more in emotion than logic and reality (e.g. Lindsey et al. 2015). Conservation, however, is not about individuals within populations, but the overall populations themselves. Sustainable sport-hunting of lions is just that: *sustainable* - and ironically, without it, the lions themselves become unsustainable. Conservation objectives need to be balanced with both social and economic factors if they are to be achieved.

The USFWS states “Well-managed conservation programs use trophy hunting revenues to sustain lion conservation, research and anti-poaching activities” (<http://www.fws.gov/endangered/what-we-do/lion.html> [accessed 2015-01-19]). The Bulye Valley and Savé Valley Conservan-

cies both fully meet each one of these conditions: clearly contributing to lion conservation in Zimbabwe; having long-term conservation research programs; and self-funded anti-poaching units.

The histories regarding the formation of both the Bulye Valley and Savé Valley Conservancies were both presented in this report, despite being remarkably similar; the point being that lion conservation in both areas, and many others, has the same fate either way. The Bulye Valley and Savé Valley Conservancies are both excellent examples of focussed and determined efforts to make wildlife based land use viable in an otherwise cattle dominated landscape. However, the fact remains that the cost of having lions, both ecologically and financially, is high. Simply increasing the abundance of one species at the expense of another cannot be considered a conservation success.

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January 26, 2016

Mr. Timothy Van Norman
Chief, Branch of Permits
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

Dear Chief Van Norman:

RCVD JAN 28 2016

LB

Enclosed please find four applications for permits authorizing the import of sport-hunted trophies of *P. l. melanochaita* from Zimbabwe. In evaluating these applications, please consider the information on lion conservation and management in Buby Valley Conservancy, Save Valley Conservancy, and Zimbabwe on the whole already submitted by Conservation Force and others. An index of this information is attached to this letter.

The information submitted by Conservation Force demonstrates that the lion conservation and management program in Zimbabwe, and specifically in Buby Valley and Save Valley Conservancies, enhances the survival of the species because it addresses the three main threats to lion: (1) loss of habitat, (2) loss of prey base, and (3) human-lion conflict, and more.

First, the information demonstrates that habitat would not otherwise exist for lion in Buby Valley and Save Valley Conservancies but for the income generated by tourist safari hunting. Both conservancies rely on the income from tourist safari hunting to fund their operations. If hunting stopped, the 1.7 million acres of habitat protected in these conservancies are likely to be lost to the lion, rhino, and prey species.

Second, Buby Valley and Save Valley Conservancies each engage in extensive anti-poaching operations that protect the lion's prey base. For example, in 2015, Buby Valley Conservancy spent \$590,000 on game scouts and anti-poaching. All of these funds were generated by tourist safari hunting.

Finally, the information shows the significant community assistance programs in place in each of these conservancies. Buby Valley Conservancy and Save Valley Conservancy each contribute \$100,000 annually to local communities in cash, services, game meat, and supplies. This support is used to build schools and clinics, maintain water infrastructure, assist with repairs and maintenance of equipment, fund school books and field trips, increase consumption of protein, and otherwise improve the quality of life for local residents. Because of these benefits, local people are more willing to tolerate lion, and human-lion conflicts are reduced.

We believe the information already in the Fish and Wildlife Service's possession satisfies the requirements of 50 C.F.R. § 17.40(r) for Zimbabwe. However, we will continue to submit information about the benefits generated by safari hunting as it becomes available.

Sincerely,

John J. Jackson, III on behalf of
Conservation Force

Enclosures:

- Application submitted on behalf of Steven Chancellor for a sport-hunted lion trophy to be hunted in Buby Valley Conservancy, Zimbabwe
- Application submitted on behalf of Kent Greenawalt for a sport-hunted lion trophy to be hunted in Buby Valley Conservancy, Zimbabwe
- Application submitted on behalf of James Horrocks for a sport-hunted lion trophy to be hunted in Buby Valley Conservancy, Zimbabwe
- Application submitted on behalf of Jeffrey Smithers for a sport-hunted lion trophy to be hunted in Buby Valley Conservancy, Zimbabwe
- Index of Documents Submitted

NEW INFORMATION ON THE AFRICAN LION

INDEX FOR: ZIMBABWE

No.	Title	Sent to FWS
1	Zimbabwe Parks & Wildlife Management Authority, Conservation Status of the African Lion (<i>Panthera leo</i>) in Zimbabwe (January 2015)	1/11/16
2	Zimbabwe Parks & Wildlife Management Authority, Age Restrictions on Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe (2014)	1/11/16
3	Dr. Byron du Preez [Oxford], Buby Valley Conservancy Lion Research Report (Jan. 12, 2016)	1/12/16
4	Blondie (Mazunga Safaris), Email re: Community Assistance Program in BVC (Jan. 20, 2016)	1/26/16
5	Blondie (Mazunga Safaris), BVC – Spreadsheet, Community Assistance 2011 & 2012	1/26/16
6	Zig, Photos of BVC Community Assistance Program	1/26/176
7	ZPHGA, Info on Lion Age Restrictions (Jan. 20, 2016)	1/25/16 Louis M 1/26/16 Us
8	Dr. Byron du Preez et al., Sport Hunting and Lion (<i>Panthera leo</i>) Conservation in Zimbabwe (Jan. 22, 2016)	1/26/16
9	Dr. Rosemary Groom, Lion Hunting in Zimbabwe's Save Valley Conservancy (Jan. 27, 2013)	1/26/16



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

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

Federal Fish and Wildlife Permit Application Form

RCVD JAN 28 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:

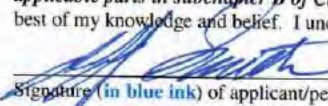
IMPORT OF SPORT-HUNTED TROPHIES Threatened-listed
(Appendix I of CITES and/or ESA) lion

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

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

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

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

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 12US75980A/9 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) 01/20/2016 Date of signature (mm/dd/yyyy)	

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
P. l. melanochaita (African lion)
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
Zimbabwe: Buby Valley Conservancy, Beit Bridge District, Matabeleland South. Nearest town is Beit Bridge and nearest city is Bulawayo. GPS coordinates for Towla are S 2126478 , E 02953162. Hunting area is a wildlife conservancy of 850,000 acres.
 - b. Date wildlife is to be hunted:
May 2016
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
All parts including skin, skull, teeth, and claws
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
N/A
 - b. Date wildlife was hunted:

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

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

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

Name: Steve Colletts
Business Name:
Address: 15 Josiah Chinamano Road
Address:
City: Bulawayo
State/Province:
Country, Postal Code: Zimbabwe

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

Please see information already provided by Conservation Force, Pete Fick/Bubye Valley Conservancy, and Zimbabwe authorities.
CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

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

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

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

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

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

Applicant's signature:  _____ Date: 01/20/2016

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

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).
9. Name and address where you wish permit mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):
10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please **DO NOT** include credit card number or other information; you will be contacted for this information.
- ☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.
11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
John J. Jackson, III or Regina Lennox of Conservation Force
504-837-1233, jjw-no2@att.net or regina.lennox@conservationforce.org
12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?
- ☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.


NOTICE OF REPRESENTATION

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

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

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

John J. Jackson, III
Regina Lennox
Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
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Signed: 
Name: JEFF SMITHERS
Date: 01/20/16

 Security features are indicated. Details on back.

JEFFERSON BANK
PO BOX 5190
SAN ANTONIO TX 78201-0190
30-76/1140

(b) (6)

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Order of*

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1-28-16

Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe

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January 31, 2016



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SUMMARY OF STEPS TAKEN BY ZIMBABWE TO IMPROVE THE MANAGEMENT OF LION SPORT-HUNTING

- i* – Banning of all lioness hunting in Zimbabwe
- ii* – Hunting moratoria around the Gonarezhou and Hwange National Parks
- iii* – Removal of fixed hunting quotas
- iv* – Age restrictions on sport-hunted lions
- v* – Scientifically-based adaptive quota management system

SUMMARY OF LION SPORT-HUNTING'S CONTRIBUTION TO CONSERVATION

- i* – Lion sport-hunting contributes 33.9% to 42.4% of total revenue on private land
- ii* – Lion sport-hunting generates up to US\$ 557 km⁻²
- iii* – Anti-poaching (in particular that of rhinoceroses) costs ~US\$ 216 km⁻²

INTRODUCTION

THE United States Fish and Wildlife Service (USFWS) have recently evaluated the conservation status of the lion *Panthera leo* with particular regard to sport-hunting (<http://www.fws.gov/endangered/what-we-do/lion.html> [accessed 2015-01-19]). The results of this evaluation have led to the formal protection of two subspecies under the Endangered Species Act, classifying *P. l. leo* as endangered and *P. l. melanochaita* as threatened. Together these subspecies apparently represent all of the lions in Africa (Barnett et al. 2014).

Sport-hunting is a legal activity in which the international import/export of trophies is both sanctioned and carefully controlled by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The USFWS found that the sport-hunting of *P. l. melanochaita* “if well managed, may provide a benefit to the subspecies” (<http://www.fws.gov/endangered/what-we-do/lion.html> [accessed 2015-01-19]). Here we explore this statement further, and present data from three long-term *in situ* lion research projects; the Buby Valley Conservation Research Initiative, Savé Val-

ley Conservancy Research, and the Hwange Lion Research Project.

The data presented in this report clearly illustrates the positive conservation benefit that well-managed trophy hunting of lions can have for the species, as well as the importance of hunting in maintaining the wildlife in an area; addressing Point 5 on page 3 of the Federal Fish and Wildlife Permit Application Form (Form 3-200-20) [i.e. “Please be

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



Figure 1: The lions pictured here, known as Winston (*standing*) and Geronimo (*lying*), were both collared in March 2012 when they were the dominant males in the Matombosa area and have been continuously monitored ever since as part of the on-going long-term WildCRU Buby Valley Conservation Research Initiative. In November 2015 Geronimo, who was approximately 9 years old, died after succumbing to injuries sustained from fighting with another male. Winston, also 9 years old, has since lost his dominant status, lost his territory to two 4.5 year old males, become nomadic and avoids contact with other males. As of this report being written, the recent litter of cubs that both Winston and Geronimo sired are still alive.

Most importantly, since July 2013 there has been a continuous self-imposed internal reform of the lion hunting industry in Zimbabwe that is actively participated in and supported by all of the relevant stakeholders, including; the Zimbabwe Parks and Wildlife Management Authority

(ZPWMA), non-governmental organisations, professional hunters, safari operators, scientists and researchers.

Here we discuss the results of this process in terms of robust evidence regarding the sustainability and self-regulation of lion hunting in Zimbabwe.



Figure 2: Winston and Geronimo's cubs.

LIONS – *Panthera leo*

The IUCN Red List have recently reclassified lions as Vulnerable (remaining as such since 1996; IUCN 2015), estimating that there are between 20,000 and 30,000 free-ranging lions left (Bauer et al. 2015a) in less than 25% of their historic range (IUCN 2006). However, this generalised classification does

not take into account an apparent conservation dichotomy: sample subpopulations of lions in Botswana, Namibia, South Africa and Zimbabwe have in fact increased overall (Bauer et al. 2015a). Lions were historically present throughout Africa, some of Europe, the Middle East and Asia (Bauer and Van Der Merwe 2004), but current conservation strongholds remain only in parts of eastern

and southern Africa (Brassine and Parker 2012; Nowell and Jackson 1996). The current lion population estimate for Zimbabwe's major lion areas is approximately 2,600 individuals [Hwange-Matetsi Complex: 750, South Eastern Lowveld: 350, Gonarezhou National Park: 60, Malilangwe: 37, Savé Valley Conservancy: 284, Bulyebe Valley Conservancy: 500, Mid-Zambezi Valley Complex: 600], though the actual number would be larger if there were data available for the countries minor lion areas that are yet to be surveyed] (ZPWMA 2015).

The lion is a uniquely social felid, forming coalitions of up to nine males associated with one or more female prides that may consist of more than 20 individuals (Macdonald et al. 2010; Schaller 1972). Lions are infamously infanticidal (Schaller 1972), where males will kill unrelated cubs so as to bring the female into oestrus and present an opportunity to sire their own litter, which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2010), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, does not result from sport-hunting when age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004). Moreover, the fission-fusion nature of lion society (Mosser and Packer 2009; Pusey and Packer 1987) means that infanticide may still occur when the dominant males are simply not present there and then to defend their cubs (B. du Preez, pers. obs.).

In the 1990's, lions were successfully reintroduced into private areas in parts of their

former range, where they achieved high reproductive and survival rates (Miller and Funston 2014). However, the resultant population growth inevitably led to the potential problem of overabundance (Funston 2008) and low genetic diversity (Trinkel et al. 2010), with both of these issues requiring active and intensive management (Hunter et al. 2007) and ultimately reducing the conservation value of these lion populations (Miller and Funston 2014). The ability to translocate lions originally facilitated the relief of overpopulation, but as the available areas for relocations were used up, sport-hunting and euthanasia have subsequently become the main methods of lion population control (Miller and Funston 2014).

The lion is the apex predator wherever it occurs (Macdonald et al. 2010), and is an ideal conservation umbrella; being large, charismatic and easily observable (e.g. Williams et al. 2000). Lions are important to commercial wildlife ventures, which risk losing significant market share where they cannot offer them to clients (Lindsey et al. 2007), and are thus prioritised in conservation; exploiting their charisma to attract tourists and raise the funds required in ensuring that wildlife areas remain viable. The lion is also a particularly valuable species in the sport-hunting industry, rivalled only in demand by buffalo *Syncerus caffer* and leopard *Panthera pardus* (Creel and Creel 1997), and are therefore prevalent in private wildlife areas (Packer et al. 2013) where their populations can achieve exponential growth rates given the protection and resources afforded by well-managed operations (Smuts et al. 1978; Loveridge et al. 2007b; Kettles and Slotow 2009; Miller and Funston 2014).

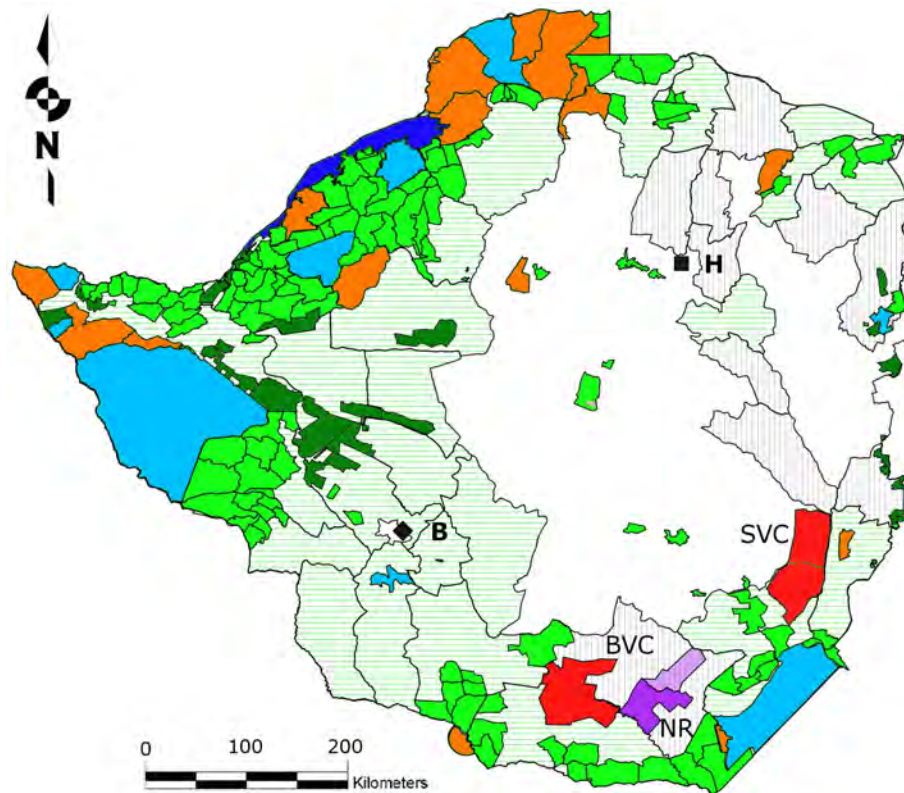


Figure 3: Map of Zimbabwe's main wildlife areas: [i] National Parks are represented in light blue; [ii] Safari areas are represented in orange; [iii] Forestry areas are represented in dark green; [iv] Community and Private wildlife areas are represented in light green; [v] Communal Land (CAMPFIRE Areas) in which sport-hunting may occur is represented by light green horizontal stripes; [vi] Communal Land in which sport-hunting does not occur is represented by grey vertical stripes. [vii] The Buby Valley [BVC] and Save Valley [SVC] Conservancies are represented in red. [viii] The Nuanetsi Ranch [NR] on which sport-hunting takes place is represented in dark purple (light purple represents the Nuanetsi Ranch cattle area); [ix] Lake Kariba is represented in dark blue. Harare (the capital city) is represented by a black square and letter 'H'. Bulawayo is represented by a black diamond and letter 'B'. Sport-hunting may occur in areas: ii, iii, iv, v, vii & viii

The ability of lions to rapidly increase in abundance is an aspect of their ecology that is often overlooked. Lion populations can achieve exponential growth rates (Miller and Funston 2015; Groom and Watermeyer 2015; du Preez et al. in prep.), and the problems associated with high lion densities fast present themselves and require significant

investment in their solution (Hunter et al. 2007; Kettles and Slotow 2009; Loveridge et al. 2007; Packer et al. 2013; Smuts 1978). Whilst unregulated sport-hunting of lions (in particular that of dominant males and pride females) may result in population declines (e.g. Packer et al. 2010; Packer et al. 2009), restricting offtake to only males over

a certain age (i.e. have already bred and/or are no longer dominant) has no impact on lion population persistence, irrespective of quota size (Whitman et al. 2004). Such is the situation currently facing both the Bulye Valley and Save Valley Conservancies, where the lion populations continue to grow despite sport-hunting and increasing quotas. Whilst sport-hunting may not alleviate over-population in these areas, it does somewhat offset the cost of keeping lions. Culling of lions may be the only realistic option for controlling numbers in larger areas, as the use of contraceptives is likely to be inefficient and expensive. Because of fears about public sentiment associated with sport-hunting, it has now become common practice for managers to cull excess lions in more than 45 wildlife areas in South Africa to which lions have been introduced, and which resulted in the wasteful destruction of about 200 lions in 2012 (Miller and Funston 2014).

CONSERVATION AND SPORT-HUNTING

There is more land area in Africa conserved for hunting than there is in all of Africa's formally protected areas combined: approximately 1.4 million km², which exceeds the total area covered by national parks by 22% (Lindsey et al. 2007). For wildlife conservation to be successful outside of national parks, these areas must be self-sufficient and able to generate sufficient revenue to cover the considerable costs of protecting the habitat and wildlife therein (Lindsey et al. 2006). Indeed, conservation would benefit from an incentive to utilise land for wildlife rather than the alternatives of livestock grazing, agriculture, and deforestation.

The international trade of lions, including trophies, is controlled by a strict CITES licensing system on the basis that this trade does not endanger the ultimate survival of the population (<https://www.cites.org/eng/disc/how.php> [accessed 2015-01-19]). The positive aspects of sport-hunting as a conservation tool include a focus on males and a low percentage off-take; neither of which generally jeopardise populations, and also suggest that hunting could play a role in population recovery (Leader-Williams et al. 2005).

The recommendation of setting uniform harvest limits, e.g. 1 lion 2,000 km⁻² (Lindsey et al. 2012; Packer et al. 2010), may be overly simplistic, affect the economics of wildlife based landscape use, and disincentivise investment in conservation (Lindsey et al. 2007). A more practical approach to sustainably setting realistic lion sport-hunting quotas could involve using a positive/negative feedback method that calculates a fluid quota per area based on the previous season's performance. Such an adaptive quota management system has already been implemented in Zimbabwe.

ZIMBABWE'S ADAPTIVE LION QUOTA MANAGEMENT SYSTEM

An adaptive quota management system for lion hunting based on the ages of lions hunted was agreed on in July 2013 in Harare, Zimbabwe, during a meeting hosted by the Zimbabwe Parks and Wildlife Management Authority (ZPWMA) and an independent non-governmental conservation organisation. The points system is summarised in Table 1.

Table 1: *Points allocated to hunting blocks arising from the harvest of lions of different ages*

	≥ 6 years	No trophy	5 years old	4 years old	< 4 years	Failure to submit return, or incomplete return
For quotas of ≥ 3	4	3	3	2	-3	0
For quotas of 2	4	3	3	2	0	0
For quotas of 1	6	3	3	2	0	0
Resultant quota	<i>These points are added up and divided by 3 to yield the quota for next year</i>					

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the system up and running. In 2014 operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015. The 2015 lion hunt results would thus also determine the 2016 quota.

Results of the Adaptive Lion Quota Management System

In 2015 there was a marked increase in the age of lions hunted in Zimbabwe as a whole. Notably, only one lion of < 4 years of age was hunted and the large majority of lions were 5 years or older (Figure 4). In 2013, only 28% of the lions hunted were 5 years or older, in 2014 that figure had risen to 49% and in 2015 to 77.3% (Figure 5). The proportion of lions hunted that were less than 5 years of age dropped overall between 2013 and 2015 (Figure 6). For this achievement, credit is due to the hunting community for showing greater selectivity of harvest. A word of caution however, is that the majority of lions hunted were on the cusp of 5 - 6 years of age and were not older than six years. Restricting hunting to individuals that are at least

six (and preferably older) is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

In 2015 the Zimbabwe national lion hunting quota was set at 85 lions. Of this 85, only 39 were hunted in 2015, and based on the resultant score from aging the trophies, and the fact that operators chose not to hunt lions of inadequate age (see Figures 4, 5 & 6), the recommended quota for 2016 was set at 75 [Harare 2015-11-11]. (The Rural District Council areas in which lions occur are currently exempted from the age restrictions, as was agreed upon at the 2013 lion management meeting in Harare, as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognising the potential negative impacts the species has on the livelihoods of livestock farmers).

Using these figures and estimating the average value of a lion safari at approximately US\$ 80,000 then a 50% offtake (35 lions) would generate US\$ 2,800,000 annually. If management costs are approximately \$150 km⁻² (V. Booth, pers. comm.), then the lion safaris alone can support 18,600 km⁻² of wildlife habitat in Zimbabwe.

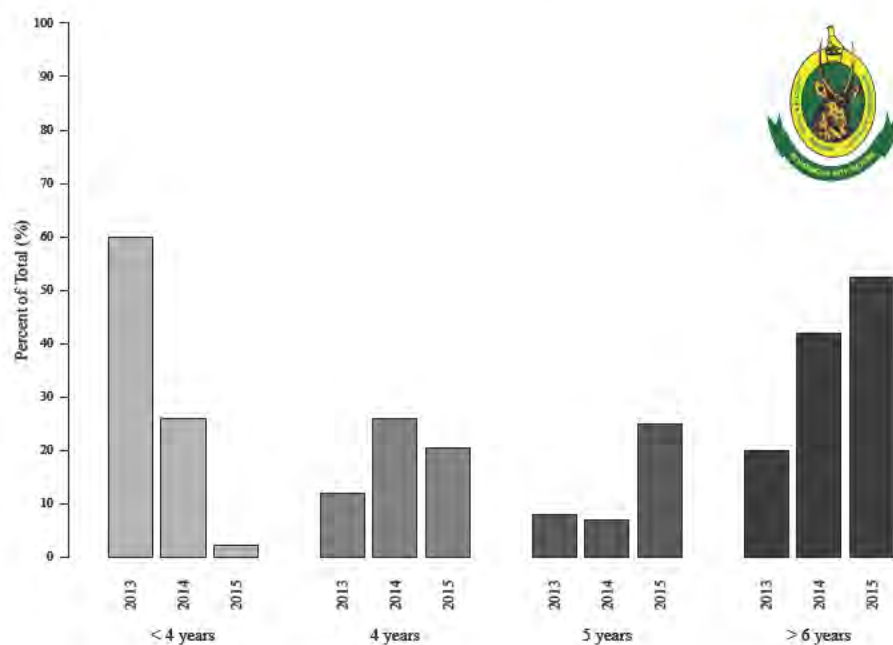


Figure 4: The percentage of lions hunted in each age class in 2013, 2014 and 2015 in Zimbabwe.

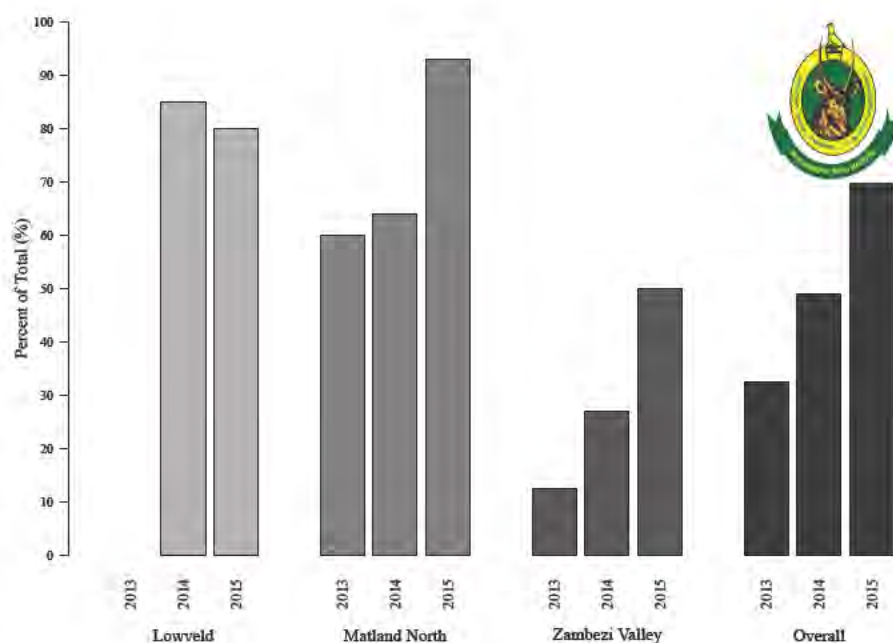


Figure 5: The proportion of lions hunted that were 5 years or older in the three main lion-hunting areas of Zimbabwe.

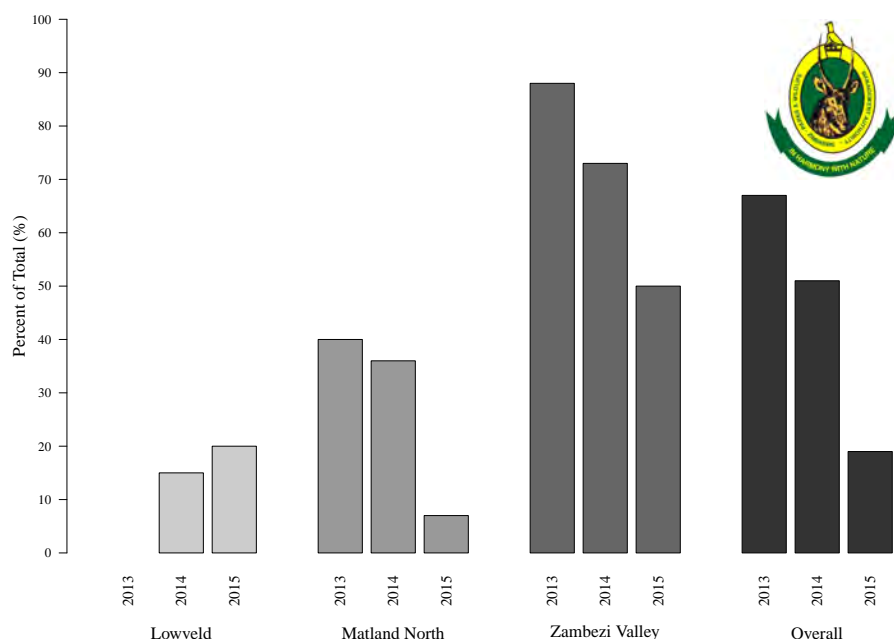


Figure 6: The proportion of lions hunted that were less than 5 years of age in the three main lion-hunting areas of Zimbabwe.

Table 2: *Human and Lion Conflict (2009 - 2011) in Zimbabwe, including human mortality caused by lion (CAMPFIRE Association, 2012)*

District	Total incidents	Livestock killed	People Injured	People Killed
Hurungwe	5	1	2	2
Chiredzi	25	136	0	0
Mbire	5	7	0	5
Binga	9	39	0	0
Total	44	183	2	7

Human-Lion Conflict

The lion is a flagship species and powerful symbol of Africa; yet living with lions poses hardships for many communities (e.g. Table 2). In some areas, the lion is a major predator on domestic livestock, inevitably leading to conflicts with local herders. Both sides suffer in this situation.

Outside of protected areas, the lion's prey base is much reduced, which results in relatively greater chance of encountering live-

stock. Co-existence of lions with people may be enhanced by giving value to lions through tourism and hunting promoted in communal lands under the Communal Area Management Programme for Indigenous Resources (CAMPFIRE). This hunting contributes to the conservation of lions via the financial revenue generated, which is ploughed back into conservation of the resource and empowers local communities to invest in their own rural development programs.

THE BUBYE VALLEY CONSERVANCY

History of the Buby Valley Conservancy

Towards the end of the nineteenth century, the Liebig's Extract of Meat Company (LEMCO) founded an extensive cattle ranch in the Zimbabwean lowveld, to the detriment of the indigenous wildlife that was initially eliminated because of competition for grazing with the livestock, as well as a risk of disease transmission from buffalo and wildebeest *Connochaetes taurinus*. As their natural prey base became depleted, the predators were subsequently persecuted when they began to prey on the livestock. Some wildlife persisted in small pockets of remote habitat, however lion, elephant *Loxodonta africana*, buffalo and rhinoceros *Diceros bicornis* [black] & *Ceratotherium simum* [white] were all completely eradicated. A monoculture of cattle dominated the landscape and impacted on the environment for the better part of a century.

Then, in 1992, Zimbabwe suffered one of the worst droughts on record, a relatively short time after the devastating one of 1983 that LEMCO was still trying to recover from. The frequency and severity of the droughts effectively reduced confidence in the economic viability of cattle ranching in the area, and the Buby Valley Conservancy was subsequently founded in 1994 with the realisation that endemic wildlife, which are better adapted than livestock to cope with the local climate, could be successfully commercialised (Child 1988; Bond 1993).

The conversion from cattle ranching back to a wildlife area was neither straightforward

nor cheap, requiring a significant initial investment and annual running costs. In just 20 years of operation the Buby Valley Conservancy now protects the world's third largest black rhinoceros population, one of Zimbabwe's largest lion populations, a large and increasing elephant population, and abundant game.

Sport-hunting is an essential step in converting areas that were previously dedicated to livestock farming into non-consumptive tourism areas (Child 1993), and was fundamental to the formation of Buby Valley Conservancy and allowing the wildlife populations to recover. The Samanyanga area of the Buby Valley Conservancy, probably the most scenic section, was originally set aside for non-consumptive photographic tourism, but made an annual loss for several years, before, largely due to Zimbabwe's land reform program and resultant instability in the country, it was reverted back to sport-hunting as the only practical and economically viable option (K. Leatham, pers. comm.). Sustainable sport-hunting provides the sole economic incentive to continue operating the Buby Valley Conservancy as a wildlife conservation area.

Buby Valley Conservancy Community Support

The Buby Valley Conservancy donates over 45 tonnes of meat from sport-hunting to the local communities each year. This meat donation is worth over US\$ 100,000 per year, and the communities are free to decide how they use it. In addition to this, the Conservancy also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda and Jopempe. The local community thus

sees a direct benefit from the wildlife on the Bulye Valley Conservancy, but is also empowered by job opportunities created both with these special projects, as well as on the Conservancy. A summary of the Bulye Valley Conservancy community support effort between 2011 and 2015 is provided in Table 4.

Bulye Valley Conservancy Lion Monitoring and Management

After originally being eradicated by cattle ranchers in the area, 13 lions were reintroduced to the Bulye Valley Conservancy in 1999, and four young males broke into the Conservancy that same year. From the original 17 animals present in 1999, the Bulye Valley Conservancy lion population was estimated at approximately 280 individuals in 2009 when robust population surveys were initiated by a research team from the University of Oxford Wildlife Conservation Research Unit (WildCRU), and this population has continued to grow. Today it is estimated that there are over 500 lions on the Bulye Valley Conservancy (du Preez et al. 2015). The exponentially increasing Bulye Valley Conservancy lion population currently exists at one of the highest

densities in Africa (~ 0.187 lions km^{-2} : du Preez et al. 2015; Figure 7), greater than that of the Serengeti, Tanzania (0.100 lions km^{-2} : Pusey and Packer 1987; Spong 2002), Selous, Tanzania (0.080 - 0.130 lions km^{-2} : Creel and Creel 1996, 1997), Kruger National Park, South Africa (0.096 - 0.112 lions km^{-2} : Mills 1995), and Hwange National Park, Zimbabwe (0.027 lions km^{-2} : Loveridge et al. 2007). This equates to one of the largest contiguous lion populations in Zimbabwe.

Bulye Valley Conservancy Lion Hunting

The Bulye Valley Conservancy offsets the cost of lion predation on its wildlife via sport-hunting of the species, and which began in 2002. In 2014, the lion hunting quota allocated to the Bulye Valley Conservancy by ZPWMA was 10 individuals. Based on the fact that the entire quota was harvested and that maximum points were scored for each individual trophy (more than six years in age), the allocated quota was raised to 13 lions for 2015. Only 12 out of 13 lions were hunted in 2015 due to a late cancellation; nevertheless eight lions over six years old and four lions of five years old were harvested and the resultant points justifying a quota of 15 lions for 2016.

Table 3: *The Bulye Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	1	2	3	2	2	2	3	3	5	8	12	10	10	13
Quota taken	1	2	3	2	2	2	2	3	5	8	12	10	10	12
Percentage success	100	100	100	100	100	100	67	100	100	100	100	100	100	92

Note that while the lion hunting quota for Zimbabwe has been voluntarily reduced by the national steering committee, the Bubyee Valley Conservancy lion hunting quota has been successively raised twice

based on both hunt success and age of lions hunted and the resultant points scored under the national adaptive quota management system (Table 3).

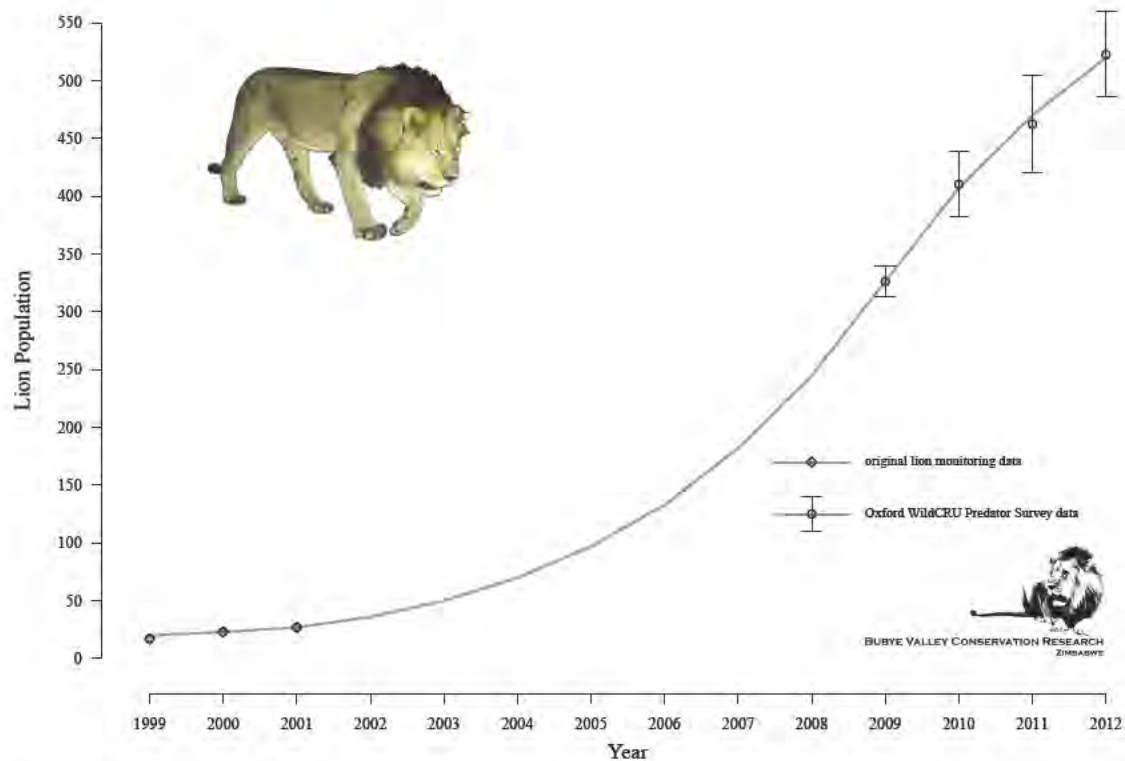


Figure 7: The Bubyee Valley Conservancy lion population has grown exponentially since the reintroduction of lions in 1999. Diamonds represent the known lion abundance from monitoring of the original individuals introduced; Points indicate lion abundance calculated from spoor transect analyses; error bars represent the standard error of the mean.

Table 4: *Summary of the Buby Valley Conservancy support to the surrounding local communities (2011 - 2015)*

Boreholes:	<ul style="list-style-type: none"> - 1 x Jompembi Village 2 - 1 x Penemene - 1 x Jompembi Village 4 - 1 x Nyimani village (Mwenezi) - 1 x Driehoek School - 1 x Mgaladivha School - 2 x Mtetengwe to supply water to the clinic site - 2 new bush pumps (complete) purchased and installed at Village 2 & Village 3 and troughs built at both sites <i>Drinking trough for cattle built at Village 2 borehole</i> <i>All boreholes equipped with new bushpumps, piping and cylinders</i> <i>Boreholes at Village 3, Mtetengwe, Mdzwiti, Vumani and Penemene and Makado Police post repaired and maintained</i> <i>All new piping and pumps etc. are supplied by BVC</i>
Buildings:	<ul style="list-style-type: none"> - Mtetengwe Clinic's main building built - 3 x F13 staff houses built <i>Clinic and House fenced - everything funded and built by BVC</i> <i>The clinic is a standard large Government clinic - male & female wards + maternity ward and outpatients</i> <i>Storerooms, offices etc. also built</i> <i>All houses and buildings are electrified, painted and supplied with running water</i> - Mtetengwe School school office block and staff room built and painted <i>All classroom windows repaired and the schools second borehole repaired.</i> - Secure engine house was built at the second borehole site - Borehole equipped with BH15S mono pump unit driven by a rebuilt Lister LT 1 engine - 5000 litre header tank and stand erected - new 5000 litre header tank purchased and fitted - pipeline laid to connect the borehole to the clinic - another pipeline connected to the same borehole to supply the Mtetengwe school with fresh water - New coldroom and refrigeration unit purchased and fitted at the Lutumba butchery <i>Part of aid program to get the Beit Bridge RDC self funding projects up and running</i> - New coldroom and refrigeration unit was purchased and fitted at the Rutenga butchery <i>Part of aid program to get the Mwenezi RDC self funding projects up and running</i>
Meat Donations:	<ul style="list-style-type: none"> - BVC donates meat on a regularly basis to the Mwenezi Orphanage - Numerous donations of meat were made to support school sports days & speech nights/prize giving events <i>Both Beit Bridge & Mwenezi districts</i> - 1600 kgs of meat has been donated each month since July 2011 to a Maranda trust <i>Administered by Chiefs and local headmen</i> <i>Excess meat sold and funds used for community projects</i> <i>Classroom roof replaced at Vhongwe school</i> <i>4 new classroom blocks constructed at other schools using funds from these monthly allocations</i> - 1000 kgs of meat per month is been donated to Beit Bridge communities since April 2014 - 1000 kgs of meat per month is been donated to Mwenezi communities since August 2013
Miscellaneous:	<ul style="list-style-type: none"> - Sports uniforms for the Penemene school team purchased (\$2600) <i>Sports uniforms required for inter-schools sports</i> - Transport the soccer teams representing Mgaladivha, Jompembi and Tongwe <i>To Lutumba for the inter-school competitions</i> - 2 sets of soccer goal posts & 2 sets of Netball poles were made for Mgaladivha School <i>New soccer field graded by BVC</i> - 2m security fencing supplied to Penemene School - Second hand door and window frames donated to Mapiri school (ex Mazunga School) - 1 new 3 1/2 " rod pump cylinder was purchased and fitted to the Vumhani borehole <i>All repairs to b/holes in the Vumhani area are done by BVC</i> - 26 bags of cement were donated to Mgaladivha School - Fencing donated to the Mgaladivha School - Supplied 10 x 5/8" mono shafts for the Botalele Clinic (Maranda) borehole - Water supply to Mlelezi Clinic - 400 m pipeline laid to supply the Nyimani Villarge's cattle with water <i>3.5 m drinking trough build for this same project</i> - 60 bags cement donated to the Welkom for repairs to a dam wall - 6 loads of riversand and 20 cement donated to Vumani Preschool - Various school renovations in both the Beit Bridge and Maranda areas
Current Projects:	<ul style="list-style-type: none"> - Construction of a School admin block at Mgaladivha School - Supply of 24 loads of riversand to Mdzwiti School (value \$1200) - All roofing materials supplied to Mdzwiti School - Supply roofing materials, cement, all window and door frames for Vumani Preschool

THE SAVÉ VALLEY CONSERVANCY

History of the Savé Valley Conservancy

The Savé Valley was a wildlife-rich wilderness until the early 1900's, when the first cattle ranching initiatives started in the area. The establishment of Devuli Ranch and Angus Ranch in 1920 paved the way for seven decades of commercial cattle ranching in the area we know today as the Savé Valley Conservancy. Roads were cut, fences erected and an everlasting 'battle' ensued against the wildlife, especially against all predators.

The large predators, especially lions, were virtually eradicated (Pole 1999). However, by the late 1980's, declining range productivity, depressions and droughts forced the landowners to consider alternative options. Around that time, empirical evidence of the competitive advantage of wildlife over livestock began to emerge (Child 1988; Bond 1993), especially in arid areas (Jansen et al 1992; Cumming 1993), and wildlife was finally given serious consideration as a viable land use option.

In 1989, a proposal was drawn up (du Toit 1989) to turn what was then the Sabi Valley Intensive Conservation Area into a wildlife conservancy. The plan was to create a single large wildlife area, especially for the re-establishment of endangered species and overexploited species, with cattle remaining the primary income generator. The Savé Valley Conservancy was constitutionally inaugurated in June 1991, and following the severe 1991/1992 drought, wildlife ranching became the primary land-use. At the time this was the largest private wildlife conser-

vancy in the world (3,410 km²).

The conservancy members then restocked the wildlife, removed all internal fencing, erected a common perimeter fence and developed effective security systems. A double, electrified, veterinary-approved fence was completed in 1995, and the following decade saw a massive investment in wildlife re-stocking and security systems.

Sport-hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, re-stock game, and improve security, especially because of the significant numbers of black rhinoceros now found there. Gradually, some of the ranchers shifted more into ecotourism. One property, Senuko Ranch, completed a 16 bed up-market lodge with a view of marketing non-consumptive safaris, offering game drives and bush walks and specializing in rhino walks and African wild dog *Lycaon pictus* den visits. Lodge occupancy rose from 0% in 1996 to 62% by the end of 1999.

However, the Zimbabwean land reform program, which was initiated in February 2000, soon made a strong negative impression in the international community, and resulted in travel bans and warning from most of Zimbabwe's source markets. This, together with the political instability meant that the wildlife industry and ecotourism industry collapsed over-night: sport-hunting became the only economically viable land use option, and has remained the only tangible source of income to the landowners of the Savé Valley Conservancy. In the case of the Senuko Lodge, for example, the land reform program resulted in a 98% cancellation of

the confirmed bookings. After four years of seeking alternative markets, the lodge could achieve no higher than 17% occupancy, and in 2005 moved back into a hunting-based operation.

A more direct impact of the land reform program for the Savé Valley Conservancy was the loss of 33% of the area of the conservancy to invading subsistence farmers (Lindsey et al 2008). The loss of land was catastrophic and the related pressure from wire snare poaching was extreme. In the following eight years (2001 to 2009), 10,520 illegal hunting incidences were recorded, 84,396 wire snares were removed and at least 6,454 wild animals killed (Lindsey et al. 2011).

Savé Valley Conservancy Community Support and Anti-Poaching

In 2012, conservancy members provided over US\$ 100,000 worth of support to adjacent villages or farmers in the resettled areas. Assistance included drilling boreholes, maintaining boreholes, dredging of dams, assisting with building projects in clinics and schools, assisting with repairs, maintenance and materials at schools, education initiatives, school field trips, provision of computer equipment in schools, craft programs and regular donations of meat.

Moreover, the conservancy recently entered into a mutually dependent agreement with the Chiefs representing the communities surrounding the Savé Valley Conservancy. The agreement links the communities to the Natural Resource Utilisation that occurs through the business operation of the conservancy and opens up opportunities for the local indigenous populations to share in any wealth creation. This agree-

ment strengthens relations between the conservancy and the surrounding local communities and creates an environment that helps to protect, conserve and sustain the natural assets of the area. The hunting tourism of the conservancy is currently the only form of income by which the surrounding communities can benefit. Revenues from trophy lion hunting constitute a significant portion of inflow and thus an important part of the community benefits. Any reduction would seriously jeopardise the growth of this infant positive relationship and community empowerment initiative.

The Savé Valley Conservancy is thus pioneering private-community partnerships in Zimbabwe, and trade restrictions on lion trophies will indirectly adversely affect these already seriously impoverished communities through a reduction in available income to share with communities. This is very likely to have a knock on impact on the lions themselves with a significantly reduced tolerance and an increase in retaliatory poisoning of lions for livestock predation. Without a demonstration of income from lions, the political pressure from the surrounding communities to remove them from the conservancy altogether will be a challenge to resist.

Savé Valley Conservancy Lion Monitoring and Management

After the Conservancy was formed, and persecution stopped, lions, mainly males, recolonized the area and their numbers started to increase in the late 1990's / early 2000's. Few lionesses were observed until 2003, when small family groups and male-female pairs were seen, and by 2004 - 2005 there were some reports of cubs. During this period 13

lions were also reintroduced into the Savé Valley Conservancy. After an initial lag phase the lion population on the Savé Valley Conservancy has increased dramatically and at present is growing exponentially (Figure 8; Groom and Watermeyer 2015).

Monitoring of the lion population began in 1999 (Pole 1999) with track index or call-up surveys being conducted sporadically until 2006. From 2007 to present, annual conservancy-wide track index surveys have been conducted using a standardized methodology (Groom and Watermeyer 2015). The resulting population estimates were verified in 2011 by a baited lion call-up survey and a collation of managers' estimates, all of which provided similar results.

Prey availability models (Hayward et al. 2007) suggest that the carrying capacity for the lion population in the Savé Valley Conservancy is approximately 271 lions. The population estimate for 2015 was 284 lions, suggesting lions have reached their ecological carrying capacity, even whilst being responsibly hunted.

A professional lion management plan was commissioned by the conservancy in 2011 (Funston 2011), to provide the Savé Valley Conservancy members with a science-based

plan to help them ethically and sustainably manage their lion population. This plan specifically advocates the use of hunting as a conservation management tool. It also demonstrates willingness by the conservancy to guide their lion management based on science and advice from professionals.

Savé Valley Conservancy Lion Hunting

Lions have been hunted in the Savé Valley Conservancy since 2002, although that was largely for removal of problem animals. Hunting began properly in 2005 with quotas increasing annually to a maximum of seven per year from 2009 onwards (Table 5), with the quota being raised to ten for 2016 based on trophy ages.

Despite offtakes of lions through sport-hunting, the lion population has continued to increase in the Conservancy. The revenue generated from hunting lions has enabled landowners to invest in proper land management, anti-poaching, water provision and fence maintenance, all of which benefit the lion population (especially as lions seem to be vulnerable to being caught in wire snares; Becker et al 2013; R. Groom, pers. obs.).

Table 5: *The Savé Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	5	5	1	3	3	4	6	7	7	7	4	2	3	5
Quota taken	1	0	1	3	3	3	3	6	5	3	4	1	3	5
Percentage success	20	0	100	100	100	75	50	86	71	43	100	50	100	100

Sport-hunting of lions brings considerable revenue to the Conservancy, revenue that is vital for the continued functioning of the area for wildlife conservation. Without the costs of lions being offset by the income

from sport-hunting, landowners cannot reasonably be expected to tolerate such high lion densities, and their numbers would have to be reduced significantly.

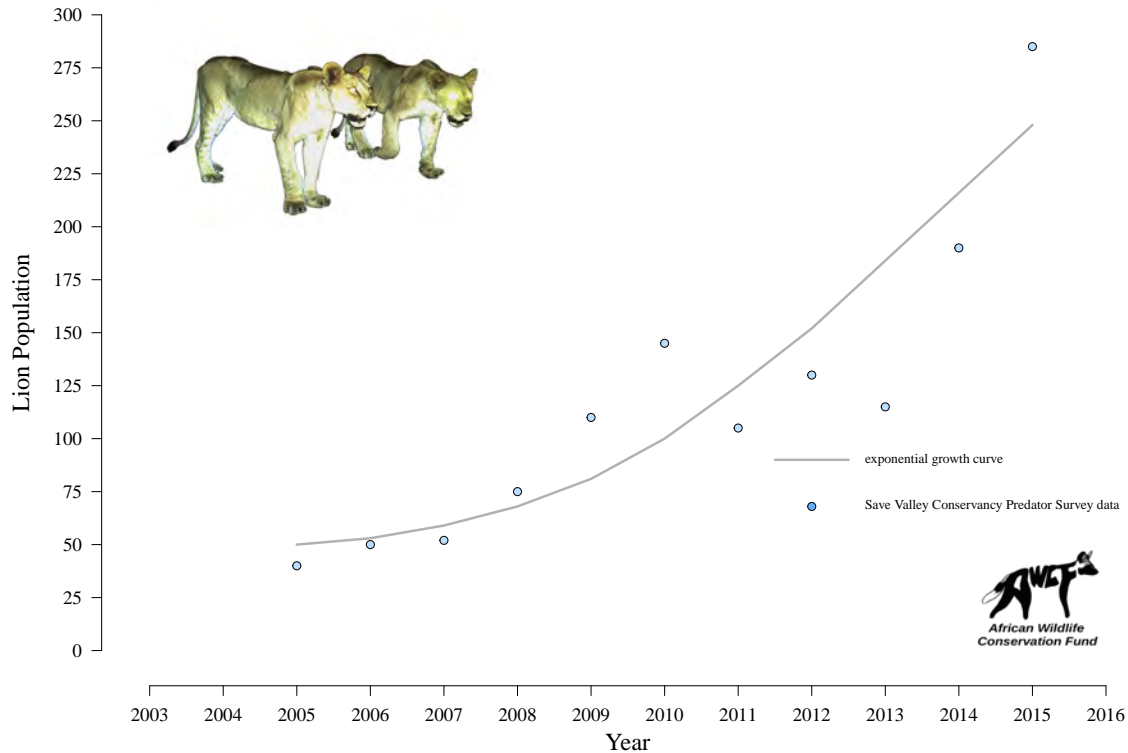


Figure 8: The Savé Valley Conservancy lion population, like that of the Buby Valley Conservancy, has grown exponentially. Points indicate estimated lion abundance calculated from field surveys; the line represents the exponential growth curve.

THE PROS AND CONS OF CONSERVING LIONS

The saturation of lions in wildlife areas on both state and private land is positive for their future conservation security; but it is also critical to that of incidentally conserved endangered species, such as both species of rhinoceros on private wildlife conservancies in Zimbabwe (Lindsey et al. 2009; Suzuki 2001), which benefit from the same resources and protection that are incentivised and provided by the revenue generated from sport-hunting. The Bulye Valley Conservancy now boasts the world's third largest black rhinoceros population (N. Anderson [Lowveld Rhino Trust], pers. comm.), which is classified as Key 1 by the African Rhino Specialist Group and means that this population is considered key to the overall survival of the species. The Save Valley Conservancy has the second largest black rhinoceros population in Zimbabwe after Bulye. These are not coincidences. These rhinoceros (and other endangered species, such as wild dog) strongholds are the result of the incidental conservation benefits derived entirely from sport-hunting activities - there are no photographic tourists visiting either the Bulye Valley or Save Valley Conservancies, and the rhinoceros are not hunted. Having rhinoceros on the land therefore generates no revenue - and in fact there is a significant cost associated with protecting these animals; US\$ 590,000 (not including incentive and reward bonuses donated for these purposes) was spent on anti-poaching by the Bulye Valley Conservancy during 2015 (K. Leathem, pers. comm.), and US\$ 546,000 is spent annually on anti-poaching by the Save Valley Conservancy (Lindsey et al. 2012). This expense is covered mainly

by the revenue generated by sport-hunting with additional donations from the clients; and most importantly, the habitat for the rhinoceros is preserved by maintaining the land as a conservation area, as opposed to converting it into agricultural or grazing land for example.

However, the high densities of lion populations achieved within commercial wildlife areas have the potential for intense intraguild persecution. Lions are aggressively competitive, and research on the relationship between lions and leopards has shown that high densities of lions can negatively affect leopard population density, demographic structure, cub survival, and spatial ecology down to even the step-wise decisions that leopards make regarding habitat use and behaviour based on both the actual and potential risk of encountering lions (du Preez 2014; du Preez 2015). Leopards are a generalist species that are able to cope with persecution by adapting their behaviour and ecological niche, and even they suffer under a burgeoning lion population; ecological specialists and endangered species, such as cheetah *Acinonyx jubatus* and wild dog, do not fare nearly as well under such intense competitive pressure. In fact, competition with lions has been directly linked to reductions in cheetah (e.g. Durant 1998, 2000; Laurenson 1995) and wild dog (e.g. Creel 2001; Creel and Creel 1996; Vucetich and Creel 1999) densities, both of which face local extinction where lion abundance, and the respective level of persecution, is high. Excessive lion densities may also result in population declines of ungulate prey (e.g. Wegge et al. 2009). It is vital to holistic conservation that wildlife managers can understand and deal with the level of impact that lions exert on other species; particularly those that

are elusive difficult to observe, and which face decline if not carefully monitored. To this end, a conservation research initiative in partnership with WildCRU was established on the Buby Valley Conservancy in 2009, and research conducted on the Savé Valley Conservancy since 2007.

Based on the number of kills made (du Preez et al. in prep.) and the current value of the meat (K. Leathem, pers. comm.),

the Buby Valley Conservancy lion population consumes hundreds of thousands of dollars worth of prey each year. These lions are mainly tolerated because of their ability to generate the revenue that helps to offset this expense - although it is estimated that economically it is still not worth keeping the lions whose cost outweighs their value (Funston et al. 2013).

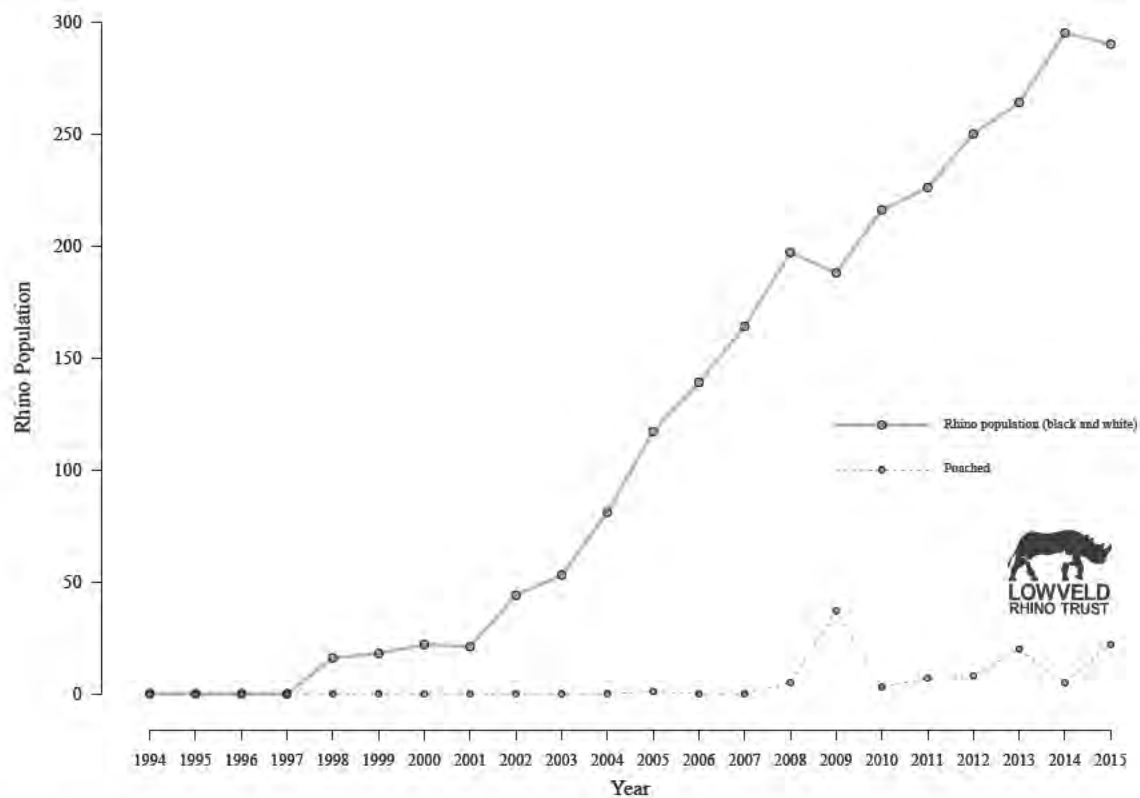


Figure 9: The Buby Valley Conservancy black rhino population is rated as Key 1 by the African Rhino Specialist Group which means that the population is considered key to the overall survival of the species.

WHERE THE MONEY GOES: THE FINANCES OF LION SPORT-HUNTING AND REINVESTMENT IN THEIR CONSERVATION

Break-down of the finances involved in a typical lion hunt on the Buby Valley Conservancy:

Lion Trophy fee: US\$ 42,000

Lion Hunt Daily rate: US\$ 2,950 day⁻¹

(Minimum lion hunt duration: 18 days [*total daily rate of US\$ 53,100 lion hunt⁻¹*])

Additional costs include:

ZPWMA scout

Observers

Bait used

Other trophy species taken during the lion hunt, etc.

[*These additional costs average approximately US\$ 6,500 lion hunt⁻¹*]

BUBY VALLEY CONSERVANCY - LION SPORT-HUNTING REVENUE GENERATED (2015):

$$((18 \text{ days} \times 2,950 \text{ day}^{-1}) + 42,000 \text{ trophy fee} + 6,500 \text{ additional costs}) \times 12 \text{ lions} \\ = \text{US\$ } 1,219,200$$

Lion sport-hunting therefore represents approximately 33.9% of the Buby Valley Conservancy's total annual revenue generation (which includes post-hunt meat and hide sales).

All of the revenue generated from lion sport-hunting on the Buby Valley Conservancy has gone back into the running costs of the Conservancy, which is all part of conservation, and which includes: anti-poaching and fence monitoring and maintenance (approximately US\$ 506,000 year⁻¹), research (approximately US\$ 34,700 year⁻¹ not including client and sponsor donations), and community support assistance (approximately US\$ 210,000 year⁻¹).

[*No profit after costs has been declared, nor dividends taken by shareholders, since the Buby Valley Conservancy was formed in 1994. All revenue generated to date has been spent on running costs, improvements and restocking.*]

DISCUSSION

Here we have shown that since their reintroduction after historical eradication, both the Buby Valley and Savé Valley Conservancies' lion populations have increased exponentially - not despite sport-hunting, but because of sport-hunting and the incentive it provides for protection.

The success of the Buby Valley and Savé Valley Conservancies, in terms of both of their hunted lion and non-hunted rhinoceros populations, may also provide the motivation for other areas in the country to sustainably manage their wildlife resource. A case in point is the Nuanetsi Ranch, a wildlife area that is also a legacy of failed cattle ranching, located almost directly between the Buby Valley and Savé Valley Conservancies in Zimbabwe (Figure 3). At present there is a single lion on the Nuanetsi Ranch but management is not able to justify introducing more due to the current uncertainty over the future of lion hunting (B. Lees-May [Nuanetsi Ranch Conservator], pers. comm.). The Nuanetsi Ranch is a wildlife area of 1,489 km², and could conceivably sustainably hold between 201 and 278 lions (based on the most recently estimated lion densities of the Savé Valley [0.135 lions km⁻²; Groom and Watermeyer 2015]; and Buby Valley [0.187 lions km⁻²; du Preez et al. 2015] Conservancies respectively). However, the Nuanetsi Ranch has invested in building up an abundant wildlife population, which is sport-hunted, and the management will not risk losing a significant amount of valuable game, that could otherwise be sold as trophies or meat, to a species from which it can not recuperate lost revenue, and instead that requires further investment in control measures (B. Lees-May [Nuanetsi

Ranch Conservator], pers. comm.).

Between 2005 and 2015 the United States market has represented 70.4% of the total Zimbabwean lion sport-hunting industry (http://trade.cites.org/en/cites_trade/ [accessed 2015-01-19]), though in reality it constituted over 90% for both the Buby Valley and Savé Valley Conservancies. If this market was effectively lost due an inability of prospective clients to import their trophies, based on the economics involved it would become unviable to continue managing the Buby Valley Conservancy as a wildlife area in its current form, and lions would either have to be re-exterminated, or at least severely reduced via culling; or else what is the largest privately owned wildlife area in the world would be converted back into a cattle ranching area (K. Leatham, pers. comm.). This is the reality of any business, in that it needs to cover costs and pay staff and cannot run at a loss for luxury of conservation. Child (1993) states “*A refusal to treat wildlife in the same way as other resources and maintenance of centralised protectionist management prejudices its survival. Only by raising its commercial value will wildlife be able to compete for space on the scarce African landscape. Trade bans which detract from wildlife’s commercial value prejudice its chances of survival in the long term*”.

Although the USFWS understandably categorises lion conservation by country for simplicity, rather than individual properties, the Buby Valley and Savé Valley Conservancies currently and deservedly hunt more than a third of the total Zimbabwean lion quota between them. Here we have shown that this sport-hunting does not negatively affect the lion population, which remains in positive growth despite off-take. In addition

to this, other areas, such as the Nuanetsi Ranch, could be incentivised to invest in lion conservation if the ability to sustainably utilise the lions as a resource was guaranteed.

The USFWS identified five primary factors that threaten lion survival in the wild, namely: habitat loss; loss of prey; retaliatory killing due to increased human-lion conflicts; inadequate regulatory mechanisms; and weak management of protected areas (<http://www.fws.gov/endangered/what-we-do/lion.html> [accessed 2015-01-19]). Each and every point on this list, which notably does not include sport-hunting, supports the fact that incentivising tolerance for lions through sustainable use would enhance the species' overall survival.

As responsible conservationists, we are not arguing against tight regulation of sport-hunting, especially with regard to sensitive species such as lions, and we support the need for transparency and accountability within the industry. However, this reform is a process being driven from within, as any indiscretion is an affront on all stakeholders. For example, long-term lion monitoring by WildCRU in Hwange National Park (HNP), Matabeleland North, Zimbabwe, documented a 'vacuum effect' and reduction in male lion density in the Park as a result of sport-hunting in the surrounding areas (Loveridge et al. 2007). A result of this research was the recommendation that ZPWMA implement a hunting moratorium in western Zimbabwe, which was accepted and enforced from 2005 to 2008 (Davidson 2009). Subsequent monitoring of the HNP lion population showed that the perturbation effects caused by sport-hunting were

reversed during the moratorium, and sport-hunting was reinstated at a reduced, more sustainable quota (Davidson 2009). This example demonstrates both the relationship between independent researchers and ZPWMA, and that the research assists ZPWMA in robust decision making. This study has also shown that the lion population was able to recover quickly, and that a blanket-ban would have been as unnecessary as it would have been detrimental to overall lion conservation in the country.

In addition to the self-imposed hunting moratorium in the Matabeleland North district, Zimbabwe has voluntarily stopped sport-hunting of any lioness. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season even began, and which was resultantly attributed to poor quality trophies and young animals being hunted, has also been abandoned. The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have minimal ecological impact, being old individuals that are no longer contributing to the gene pool nor protecting cubs.

The IUCN Red List lion conservation status has remained unchanged for 20 years even in the face of Africa's ever-changing landscape. Despite fears that lion abundance is decreasing overall, in southern Africa it is in fact increasing (Bauer et al. 2015b).

CONCLUSION

Given the evidence presented, the arguments against sport-hunting would appear to be based more in emotion than logic and reality (e.g. Lindsey et al. 2015). Conservation, however, is not about individuals within populations, but the overall populations themselves. Sustainable sport-hunting of lions is just that: *sustainable* - and ironically, without it, the lions themselves become unsustainable. Conservation objectives need to be balanced with both social and economic factors if they are to be achieved.

The USFWS states “Well-managed conservation programs use trophy hunting revenues to sustain lion conservation, research and anti-poaching activities” (<http://www.fws.gov/endangered/what-we-do/lion.html> [accessed 2015-01-19]). The Bulye Valley and Savé Valley Conservan-

cies both fully meet each one of these conditions: clearly contributing to lion conservation in Zimbabwe; having long-term conservation research programs; and self-funded anti-poaching units.

The histories regarding the formation of both the Bulye Valley and Savé Valley Conservancies were both presented in this report, despite being remarkably similar; the point being that lion conservation in both areas, and many others, has the same fate either way. The Bulye Valley and Savé Valley Conservancies are both excellent examples of focussed and determined efforts to make wildlife based land use viable in an otherwise cattle dominated landscape. However, the fact remains that the cost of having lions, both ecologically and financially, is high. Simply increasing the abundance of one species at the expense of another cannot be considered a conservation success.

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† BARON BERTRAND DES CLERS, PH.D.

† JAMES G. TEER, PH.D.

† BART O'GARA, PH.D.

January 26, 2016

BOARD OF DIRECTORS:

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Mr. Timothy Van Norman
Chief, Branch of Permits
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

Dear Chief Van Norman:

RCVD JAN 28 2016

Enclosed please find four applications for permits authorizing the import of sport-hunted trophies of *P. l. melanochaita* from Zimbabwe. In evaluating these applications, please consider the information on lion conservation and management in Buby Valley Conservancy, Save Valley Conservancy, and Zimbabwe on the whole already submitted by Conservation Force and others. An index of this information is attached to this letter.

The information submitted by Conservation Force demonstrates that the lion conservation and management program in Zimbabwe, and specifically in Buby Valley and Save Valley Conservancies, enhances the survival of the species because it addresses the three main threats to lion: (1) loss of habitat, (2) loss of prey base, and (3) human-lion conflict, and more.

First, the information demonstrates that habitat would not otherwise exist for lion in Buby Valley and Save Valley Conservancies but for the income generated by tourist safari hunting. Both conservancies rely on the income from tourist safari hunting to fund their operations. If hunting stopped, the 1.7 million acres of habitat protected in these conservancies are likely to be lost to the lion, rhino, and prey species.

Second, Buby Valley and Save Valley Conservancies each engage in extensive anti-poaching operations that protect the lion's prey base. For example, in 2015, Buby Valley Conservancy spent \$590,000 on game scouts and anti-poaching. All of these funds were generated by tourist safari hunting.

Finally, the information shows the significant community assistance programs in place in each of these conservancies. Buby Valley Conservancy and Save Valley Conservancy each contribute \$100,000 annually to local communities in cash, services, game meat, and supplies. This support is used to build schools and clinics, maintain water infrastructure, assist with repairs and maintenance of equipment, fund school books and field trips, increase consumption of protein, and otherwise improve the quality of life for local residents. Because of these benefits, local people are more willing to tolerate lion, and human-lion conflicts are reduced.

We believe the information already in the Fish and Wildlife Service's possession satisfies the requirements of 50 C.F.R. § 17.40(r) for Zimbabwe. However, we will continue to submit information about the benefits generated by safari hunting as it becomes available.

Sincerely,

John J. Jackson, III on behalf of
Conservation Force

Enclosures:

- Application submitted on behalf of Steven Chancellor for a sport-hunted lion trophy to be hunted in Buby Valley Conservancy, Zimbabwe
- Application submitted on behalf of Kent Greenawalt for a sport-hunted lion trophy to be hunted in Buby Valley Conservancy, Zimbabwe
- Application submitted on behalf of James Horrocks for a sport-hunted lion trophy to be hunted in Buby Valley Conservancy, Zimbabwe
- Application submitted on behalf of Jeffrey Smithers for a sport-hunted lion trophy to be hunted in Buby Valley Conservancy, Zimbabwe
- Index of Documents Submitted

NEW INFORMATION ON THE AFRICAN LION

INDEX FOR: ZIMBABWE

No.	Title	Sent to FWS
1	Zimbabwe Parks & Wildlife Management Authority, Conservation Status of the African Lion (<i>Panthera leo</i>) in Zimbabwe (January 2015)	1/11/16
2	Zimbabwe Parks & Wildlife Management Authority, Age Restrictions on Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe (2014)	1/11/16
3	Dr. Byron du Preez [Oxford], Buby Valley Conservancy Lion Research Report (Jan. 12, 2016)	1/12/16
4	Blondie (Mazunga Safaris), Email re: Community Assistance Program in BVC (Jan. 20, 2016)	1/26/16
5	Blondie (Mazunga Safaris), BVC – Spreadsheet, Community Assistance 2011 & 2012	1/26/16
6	Zig, Photos of BVC Community Assistance Program	1/26/176
7	ZPHGA, Info on Lion Age Restrictions (Jan. 20, 2016)	1/25/16 Louis M 1/26/16 Us
8	Dr. Byron du Preez et al., Sport Hunting and Lion (<i>Panthera leo</i>) Conservation in Zimbabwe (Jan. 22, 2016)	1/26/16
9	Dr. Rosemary Groom, Lion Hunting in Zimbabwe's Save Valley Conservancy (Jan. 27, 2013)	1/26/16



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

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

Federal Fish and Wildlife Permit Application Form

RCVD JAN 28 2016

LB

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

Type of Activity:

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

Threatened-Listed
Lion

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

A. Complete if applying as an individual			
1.a. Last name Chancellor	1.b. First name Steven	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions)
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 name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

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

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: US43277A/9 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) <i>Shirley E. Chouh</i> Date of signature (mm/dd/yyyy) <i>1-19-16</i>	

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera Leo Melanochaita

b. Sex (if known).

Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

Zimbabwe: Buby Valley Conservancy, Beit Bridge District, Matabeleland South. Nearest town is Beit Bridge and nearest city is Bulawayo. GPS coordinates for Towla are S 2126478 , E 02953162. Hunting area is a wildlife conservancy consisting of 850.000 acres.

b. Date wildlife is to be hunted:

July 2016

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

All parts including skin, skull, teeth and claws

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

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

b. Date wildlife was hunted:

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:
4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: **Steve Colletts**

Business Name:

Address: **15 Josiah Chinamano Road**

Address:

City: **Bulawayo**

State/Province: **Zimbabwe**

Country, Postal Code:

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

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

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

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

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

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

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

Applicant's signature:  Date: 1-19-16

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):
John J. Jackson, III or Regina Lennox of Conservation Force 504-837-1233, jjw-no2@att.net or regina.lennox@conservationforce.org
12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?
- ☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

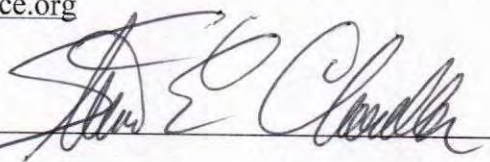
NOTICE OF REPRESENTATION

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

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

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

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

Signed: 

Name: _____

Date: _____

STEVEN  CHANCELLOR
EVANSVILLE, IN 

OLD NATIONAL BANK
Evansville, Indiana


1/20/2016

PAY TO THE
ORDER OF U. S. Fish and Wildlife Service

\$ **100.00

One Hundred and 00/100*****

U. S. Fish and Wildlife Service

DOLLARS

MEMO

Carol J. Anderson
AUTHORIZED SIGNATURE

Security features. Details on back.



 (b) (6)

1-28-16

Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe

Dr Byron du Preez^{†1}, Dr Rosemary Groom^{‡2}, Olivia Mufute^{§3} and
Roseline Mandisodza-Chikerema^{¶3}

¹Bubye Valley Conservation Research Initiative

²African Wildlife Conservation Fund

³Zimbabwe Parks and Wildlife Management Authority

January 31, 2016



*

[†] byron.d.dupreez@gmail.com

[‡] rosemary@africanwildlifeconservationfund.org

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[¶] mandisodzar@gmail.com

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SUMMARY OF STEPS TAKEN BY ZIMBABWE TO IMPROVE THE MANAGEMENT OF LION SPORT-HUNTING

- i* – Banning of all lioness hunting in Zimbabwe
- ii* – Hunting moratoria around the Gonarezhou and Hwange National Parks
- iii* – Removal of fixed hunting quotas
- iv* – Age restrictions on sport-hunted lions
- v* – Scientifically-based adaptive quota management system

SUMMARY OF LION SPORT-HUNTING'S CONTRIBUTION TO CONSERVATION

- i* – Lion sport-hunting contributes 33.9% to 42.4% of total revenue on private land
- ii* – Lion sport-hunting generates up to US\$ 557 km⁻²
- iii* – Anti-poaching (in particular that of rhinoceroses) costs ~US\$ 216 km⁻²

INTRODUCTION

THE United States Fish and Wildlife Service (USFWS) have recently evaluated the conservation status of the lion *Panthera leo* with particular regard to sport-hunting (<http://www.fws.gov/endangered/what-we-do/lion.html> [accessed 2015-01-19]). The results of this evaluation have led to the formal protection of two subspecies under the Endangered Species Act, classifying *P. l. leo* as endangered and *P. l. melanochaita* as threatened. Together these subspecies apparently represent all of the lions in Africa (Barnett et al. 2014).

Sport-hunting is a legal activity in which the international import/export of trophies is both sanctioned and carefully controlled by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The USFWS found that the sport-hunting of *P. l. melanochaita* “if well managed, may provide a benefit to the subspecies” (<http://www.fws.gov/endangered/what-we-do/lion.html> [accessed 2015-01-19]). Here we explore this statement further, and present data from three long-term *in situ* lion research projects; the Buby Valley Conservation Research Initiative, Savé Val-

ley Conservancy Research, and the Hwange Lion Research Project.

The data presented in this report clearly illustrates the positive conservation benefit that well-managed trophy hunting of lions can have for the species, as well as the importance of hunting in maintaining the wildlife in an area; addressing Point 5 on page 3 of the Federal Fish and Wildlife Permit Application Form (Form 3-200-20) [i.e. “Please be

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



Figure 1: The lions pictured here, known as Winston (*standing*) and Geronimo (*lying*), were both collared in March 2012 when they were the dominant males in the Matombosa area and have been continuously monitored ever since as part of the on-going long-term WildCRU Buby Valley Conservation Research Initiative. In November 2015 Geronimo, who was approximately 9 years old, died after succumbing to injuries sustained from fighting with another male. Winston, also 9 years old, has since lost his dominant status, lost his territory to two 4.5 year old males, become nomadic and avoids contact with other males. As of this report being written, the recent litter of cubs that both Winston and Geronimo sired are still alive.

Most importantly, since July 2013 there has been a continuous self-imposed internal reform of the lion hunting industry in Zimbabwe that is actively participated in and supported by all of the relevant stakeholders, including; the Zimbabwe Parks and Wildlife Management Authority

(ZPWMA), non-governmental organisations, professional hunters, safari operators, scientists and researchers.

Here we discuss the results of this process in terms of robust evidence regarding the sustainability and self-regulation of lion hunting in Zimbabwe.



Figure 2: Winston and Geronimo's cubs.

LIONS – *Panthera leo*

The IUCN Red List have recently reclassified lions as Vulnerable (remaining as such since 1996; IUCN 2015), estimating that there are between 20,000 and 30,000 free-ranging lions left (Bauer et al. 2015a) in less than 25% of their historic range (IUCN 2006). However, this generalised classification does

not take into account an apparent conservation dichotomy: sample subpopulations of lions in Botswana, Namibia, South Africa and Zimbabwe have in fact increased overall (Bauer et al. 2015a). Lions were historically present throughout Africa, some of Europe, the Middle East and Asia (Bauer and Van Der Merwe 2004), but current conservation strongholds remain only in parts of eastern

and southern Africa (Brassine and Parker 2012; Nowell and Jackson 1996). The current lion population estimate for Zimbabwe's major lion areas is approximately 2,600 individuals [Hwange-Matetsi Complex: 750, South Eastern Lowveld: 350, Gonarezhou National Park: 60, Malilangwe: 37, Savé Valley Conservancy: 284, Bulye Valley Conservancy: 500, Mid-Zambezi Valley Complex: 600], though the actual number would be larger if there were data available for the countries minor lion areas that are yet to be surveyed] (ZPWMA 2015).

The lion is a uniquely social felid, forming coalitions of up to nine males associated with one or more female prides that may consist of more than 20 individuals (Macdonald et al. 2010; Schaller 1972). Lions are infamously infanticidal (Schaller 1972), where males will kill unrelated cubs so as to bring the female into oestrus and present an opportunity to sire their own litter, which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2010), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, does not result from sport-hunting when age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004). Moreover, the fission-fusion nature of lion society (Mosser and Packer 2009; Pusey and Packer 1987) means that infanticide may still occur when the dominant males are simply not present there and then to defend their cubs (B. du Preez, pers. obs.).

In the 1990's, lions were successfully reintroduced into private areas in parts of their

former range, where they achieved high reproductive and survival rates (Miller and Funston 2014). However, the resultant population growth inevitably led to the potential problem of overabundance (Funston 2008) and low genetic diversity (Trinkel et al. 2010), with both of these issues requiring active and intensive management (Hunter et al. 2007) and ultimately reducing the conservation value of these lion populations (Miller and Funston 2014). The ability to translocate lions originally facilitated the relief of overpopulation, but as the available areas for relocations were used up, sport-hunting and euthanasia have subsequently become the main methods of lion population control (Miller and Funston 2014).

The lion is the apex predator wherever it occurs (Macdonald et al. 2010), and is an ideal conservation umbrella; being large, charismatic and easily observable (e.g. Williams et al. 2000). Lions are important to commercial wildlife ventures, which risk losing significant market share where they cannot offer them to clients (Lindsey et al. 2007), and are thus prioritised in conservation; exploiting their charisma to attract tourists and raise the funds required in ensuring that wildlife areas remain viable. The lion is also a particularly valuable species in the sport-hunting industry, rivalled only in demand by buffalo *Syncerus caffer* and leopard *Panthera pardus* (Creel and Creel 1997), and are therefore prevalent in private wildlife areas (Packer et al. 2013) where their populations can achieve exponential growth rates given the protection and resources afforded by well-managed operations (Smuts et al. 1978; Loveridge et al. 2007b; Kettles and Slotow 2009; Miller and Funston 2014).

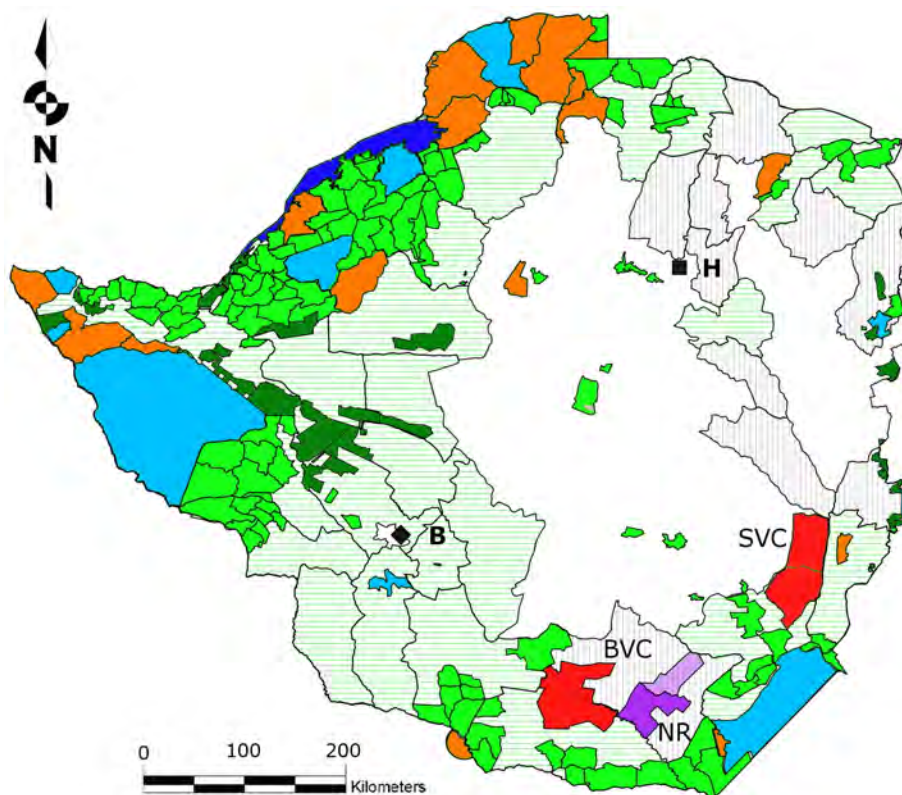


Figure 3: Map of Zimbabwe's main wildlife areas: [i] National Parks are represented in light blue; [ii] Safari areas are represented in orange; [iii] Forestry areas are represented in dark green; [iv] Community and Private wildlife areas are represented in light green; [v] Communal Land (CAMPFIRE Areas) in which sport-hunting may occur is represented by light green horizontal stripes; [vi] Communal Land in which sport-hunting does not occur is represented by grey vertical stripes. [vii] The Bulyepi Valley [BVC] and Save Valley [SVC] Conservancies are represented in red. [viii] The Nuanetsi Ranch [NR] on which sport-hunting takes place is represented in dark purple (light purple represents the Nuanetsi Ranch cattle area); [ix] Lake Kariba is represented in dark blue. Harare (the capital city) is represented by a black square and letter 'H'. Bulawayo is represented by a black diamond and letter 'B'. Sport-hunting may occur in areas: ii, iii, iv, v, vii & viii

The ability of lions to rapidly increase in abundance is an aspect of their ecology that is often overlooked. Lion populations can achieve exponential growth rates (Miller and Funston 2015; Groom and Watermeyer 2015; du Preez et al. in prep.), and the problems associated with high lion densities fast present themselves and require significant

investment in their solution (Hunter et al. 2007; Kettles and Slotow 2009; Loveridge et al. 2007; Packer et al. 2013; Smuts 1978). Whilst unregulated sport-hunting of lions (in particular that of dominant males and pride females) may result in population declines (e.g. Packer et al. 2010; Packer et al. 2009), restricting off-take to only males over

a certain age (i.e. have already bred and/or are no longer dominant) has no impact on lion population persistence, irrespective of quota size (Whitman et al. 2004). Such is the situation currently facing both the Bulye Valley and Savé Valley Conservancies, where the lion populations continue to grow despite sport-hunting and increasing quotas. Whilst sport-hunting may not alleviate over-population in these areas, it does somewhat offset the cost of keeping lions. Culling of lions may be the only realistic option for controlling numbers in larger areas, as the use of contraceptives is likely to be inefficient and expensive. Because of fears about public sentiment associated with sport-hunting, it has now become common practice for managers to cull excess lions in more than 45 wildlife areas in South Africa to which lions have been introduced, and which resulted in the wasteful destruction of about 200 lions in 2012 (Miller and Funston 2014).

CONSERVATION AND SPORT-HUNTING

There is more land area in Africa conserved for hunting than there is in all of Africa's formally protected areas combined: approximately 1.4 million km², which exceeds the total area covered by national parks by 22% (Lindsey et al. 2007). For wildlife conservation to be successful outside of national parks, these areas must be self-sufficient and able to generate sufficient revenue to cover the considerable costs of protecting the habitat and wildlife therein (Lindsey et al. 2006). Indeed, conservation would benefit from an incentive to utilise land for wildlife rather than the alternatives of livestock grazing, agriculture, and deforestation.

The international trade of lions, including trophies, is controlled by a strict CITES licensing system on the basis that this trade does not endanger the ultimate survival of the population (<https://www.cites.org/eng/disc/how.php> [accessed 2015-01-19]). The positive aspects of sport-hunting as a conservation tool include a focus on males and a low percentage off-take; neither of which generally jeopardise populations, and also suggest that hunting could play a role in population recovery (Leader-Williams et al. 2005).

The recommendation of setting uniform harvest limits, e.g. 1 lion 2,000 km⁻² (Lindsey et al. 2012; Packer et al. 2010), may be overly simplistic, affect the economics of wildlife based landscape use, and disincentivise investment in conservation (Lindsey et al. 2007). A more practical approach to sustainably setting realistic lion sport-hunting quotas could involve using a positive/negative feedback method that calculates a fluid quota per area based on the previous season's performance. Such an adaptive quota management system has already been implemented in Zimbabwe.

ZIMBABWE'S ADAPTIVE LION QUOTA MANAGEMENT SYSTEM

An adaptive quota management system for lion hunting based on the ages of lions hunted was agreed on in July 2013 in Harare, Zimbabwe, during a meeting hosted by the Zimbabwe Parks and Wildlife Management Authority (ZPWMA) and an independent non-governmental conservation organisation. The points system is summarised in Table 1.

Table 1: *Points allocated to hunting blocks arising from the harvest of lions of different ages*

	≥ 6 years	No trophy	5 years old	4 years old	< 4 years	Failure to submit return, or incomplete return
For quotas of ≥ 3	4	3	3	2	-3	0
For quotas of 2	4	3	3	2	0	0
For quotas of 1	6	3	3	2	0	0
Resultant quota	<i>These points are added up and divided by 3 to yield the quota for next year</i>					

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the system up and running. In 2014 operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015. The 2015 lion hunt results would thus also determine the 2016 quota.

Results of the Adaptive Lion Quota Management System

In 2015 there was a marked increase in the age of lions hunted in Zimbabwe as a whole. Notably, only one lion of < 4 years of age was hunted and the large majority of lions were 5 years or older (Figure 4). In 2013, only 28% of the lions hunted were 5 years or older, in 2014 that figure had risen to 49% and in 2015 to 77.3% (Figure 5). The proportion of lions hunted that were less than 5 years of age dropped overall between 2013 and 2015 (Figure 6). For this achievement, credit is due to the hunting community for showing greater selectivity of harvest. A word of caution however, is that the majority of lions hunted were on the cusp of 5 - 6 years of age and were not older than six years. Restricting hunting to individuals that are at least

six (and preferably older) is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

In 2015 the Zimbabwe national lion hunting quota was set at 85 lions. Of this 85, only 39 were hunted in 2015, and based on the resultant score from aging the trophies, and the fact that operators chose not to hunt lions of inadequate age (see Figures 4, 5 & 6), the recommended quota for 2016 was set at 75 [Harare 2015-11-11]. (The Rural District Council areas in which lions occur are currently exempted from the age restrictions, as was agreed upon at the 2013 lion management meeting in Harare, as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognising the potential negative impacts the species has on the livelihoods of livestock farmers).

Using these figures and estimating the average value of a lion safari at approximately US\$ 80,000 then a 50% offtake (35 lions) would generate US\$ 2,800,000 annually. If management costs are approximately \$150 km⁻² (V. Booth, pers. comm.), then the lion safaris alone can support 18,600 km⁻² of wildlife habitat in Zimbabwe.

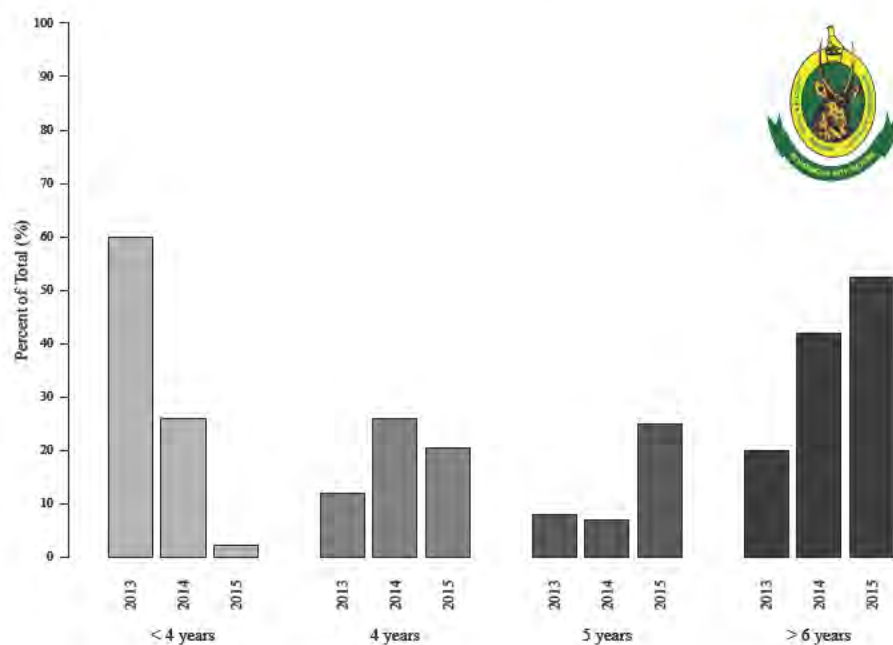


Figure 4: The percentage of lions hunted in each age class in 2013, 2014 and 2015 in Zimbabwe.

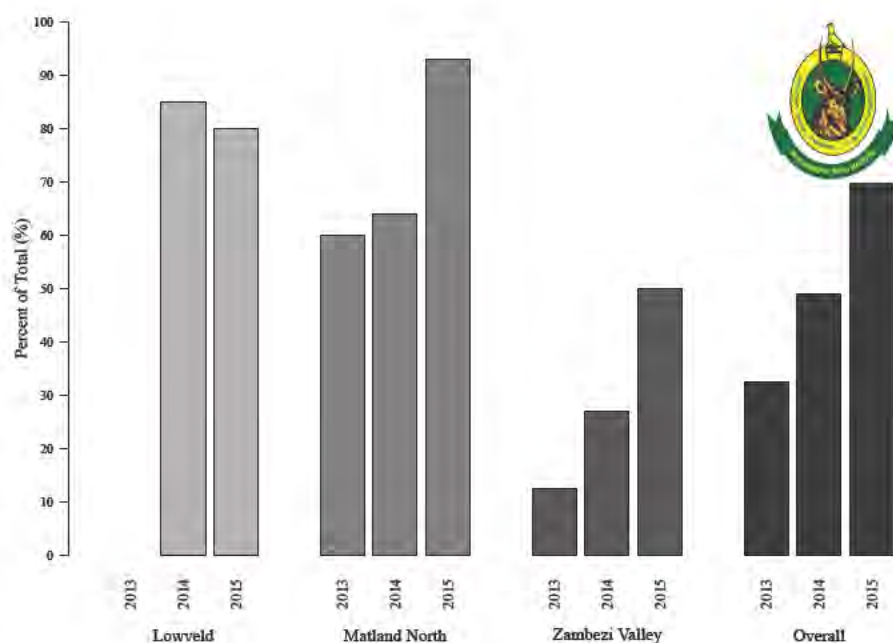


Figure 5: The proportion of lions hunted that were 5 years or older in the three main lion-hunting areas of Zimbabwe.

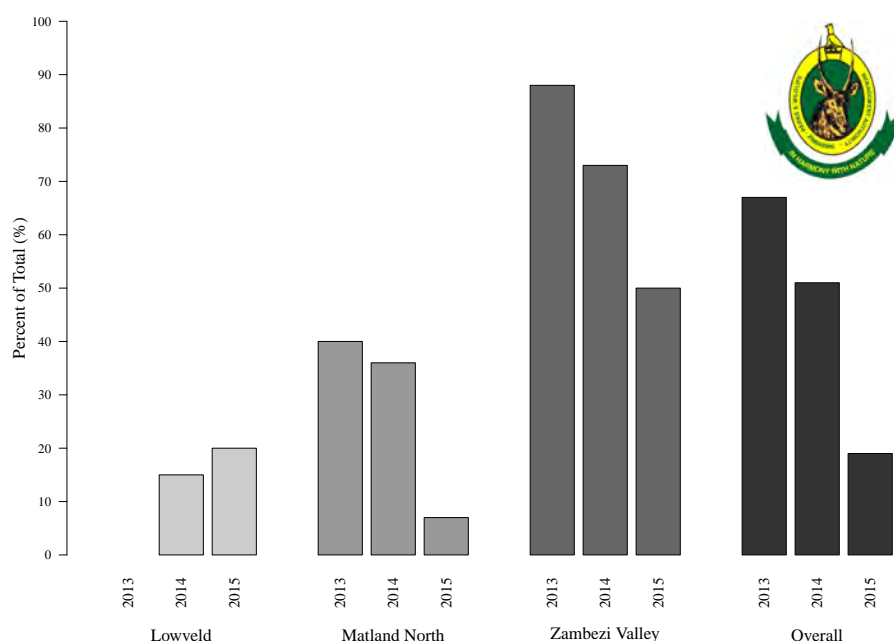


Figure 6: The proportion of lions hunted that were less than 5 years of age in the three main lion-hunting areas of Zimbabwe.

Table 2: *Human and Lion Conflict (2009 - 2011) in Zimbabwe, including human mortality caused by lion (CAMPFIRE Association, 2012)*

District	Total incidents	Livestock killed	People Injured	People Killed
Hurungwe	5	1	2	2
Chiredzi	25	136	0	0
Mbire	5	7	0	5
Binga	9	39	0	0
Total	44	183	2	7

Human-Lion Conflict

The lion is a flagship species and powerful symbol of Africa; yet living with lions poses hardships for many communities (e.g. Table 2). In some areas, the lion is a major predator on domestic livestock, inevitably leading to conflicts with local herders. Both sides suffer in this situation.

Outside of protected areas, the lion's prey base is much reduced, which results in relatively greater chance of encountering live-

stock. Co-existence of lions with people may be enhanced by giving value to lions through tourism and hunting promoted in communal lands under the Communal Area Management Programme for Indigenous Resources (CAMPFIRE). This hunting contributes to the conservation of lions via the financial revenue generated, which is ploughed back into conservation of the resource and empowers local communities to invest in their own rural development programs.

THE BUBYE VALLEY CONSERVANCY

History of the Buby Valley Conservancy

Towards the end of the nineteenth century, the Liebig's Extract of Meat Company (LEMCO) founded an extensive cattle ranch in the Zimbabwean lowveld, to the detriment of the indigenous wildlife that was initially eliminated because of competition for grazing with the livestock, as well as a risk of disease transmission from buffalo and wildebeest *Connochaetes taurinus*. As their natural prey base became depleted, the predators were subsequently persecuted when they began to prey on the livestock. Some wildlife persisted in small pockets of remote habitat, however lion, elephant *Loxodonta africana*, buffalo and rhinoceros *Diceros bicornis* [black] & *Ceratotherium simum* [white] were all completely eradicated. A monoculture of cattle dominated the landscape and impacted on the environment for the better part of a century.

Then, in 1992, Zimbabwe suffered one of the worst droughts on record, a relatively short time after the devastating one of 1983 that LEMCO was still trying to recover from. The frequency and severity of the droughts effectively reduced confidence in the economic viability of cattle ranching in the area, and the Buby Valley Conservancy was subsequently founded in 1994 with the realisation that endemic wildlife, which are better adapted than livestock to cope with the local climate, could be successfully commercialised (Child 1988; Bond 1993).

The conversion from cattle ranching back to a wildlife area was neither straightforward

nor cheap, requiring a significant initial investment and annual running costs. In just 20 years of operation the Buby Valley Conservancy now protects the world's third largest black rhinoceros population, one of Zimbabwe's largest lion populations, a large and increasing elephant population, and abundant game.

Sport-hunting is an essential step in converting areas that were previously dedicated to livestock farming into non-consumptive tourism areas (Child 1993), and was fundamental to the formation of Buby Valley Conservancy and allowing the wildlife populations to recover. The Samanyanga area of the Buby Valley Conservancy, probably the most scenic section, was originally set aside for non-consumptive photographic tourism, but made an annual loss for several years, before, largely due to Zimbabwe's land reform program and resultant instability in the country, it was reverted back to sport-hunting as the only practical and economically viable option (K. Leatham, pers. comm.). Sustainable sport-hunting provides the sole economic incentive to continue operating the Buby Valley Conservancy as a wildlife conservation area.

Buby Valley Conservancy Community Support

The Buby Valley Conservancy donates over 45 tonnes of meat from sport-hunting to the local communities each year. This meat donation is worth over US\$ 100,000 per year, and the communities are free to decide how they use it. In addition to this, the Conservancy also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda and Jopempe. The local community thus

sees a direct benefit from the wildlife on the Bulye Valley Conservancy, but is also empowered by job opportunities created both with these special projects, as well as on the Conservancy. A summary of the Bulye Valley Conservancy community support effort between 2011 and 2015 is provided in Table 4.

Bulye Valley Conservancy Lion Monitoring and Management

After originally being eradicated by cattle ranchers in the area, 13 lions were reintroduced to the Bulye Valley Conservancy in 1999, and four young males broke into the Conservancy that same year. From the original 17 animals present in 1999, the Bulye Valley Conservancy lion population was estimated at approximately 280 individuals in 2009 when robust population surveys were initiated by a research team from the University of Oxford Wildlife Conservation Research Unit (WildCRU), and this population has continued to grow. Today it is estimated that there are over 500 lions on the Bulye Valley Conservancy (du Preez et al. 2015). The exponentially increasing Bulye Valley Conservancy lion population currently exists at one of the highest

densities in Africa (~ 0.187 lions km^{-2} : du Preez et al. 2015; Figure 7), greater than that of the Serengeti, Tanzania (0.100 lions km^{-2} : Pusey and Packer 1987; Spong 2002), Selous, Tanzania (0.080 - 0.130 lions km^{-2} : Creel and Creel 1996, 1997), Kruger National Park, South Africa (0.096 - 0.112 lions km^{-2} : Mills 1995), and Hwange National Park, Zimbabwe (0.027 lions km^{-2} : Loveridge et al. 2007). This equates to one of the largest contiguous lion populations in Zimbabwe.

Bulye Valley Conservancy Lion Hunting

The Bulye Valley Conservancy offsets the cost of lion predation on its wildlife via sport-hunting of the species, and which began in 2002. In 2014, the lion hunting quota allocated to the Bulye Valley Conservancy by ZPWMA was 10 individuals. Based on the fact that the entire quota was harvested and that maximum points were scored for each individual trophy (more than six years in age), the allocated quota was raised to 13 lions for 2015. Only 12 out of 13 lions were hunted in 2015 due to a late cancellation; nevertheless eight lions over six years old and four lions of five years old were harvested and the resultant points justifying a quota of 15 lions for 2016.

Table 3: *The Bulye Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	1	2	3	2	2	2	3	3	5	8	12	10	10	13
Quota taken	1	2	3	2	2	2	2	3	5	8	12	10	10	12
Percentage success	100	100	100	100	100	100	67	100	100	100	100	100	100	92

Note that while the lion hunting quota for Zimbabwe has been voluntarily reduced by the national steering committee, the Buby Valley Conservancy lion hunting quota has been successively raised twice

based on both hunt success and age of lions hunted and the resultant points scored under the national adaptive quota management system (Table 3).

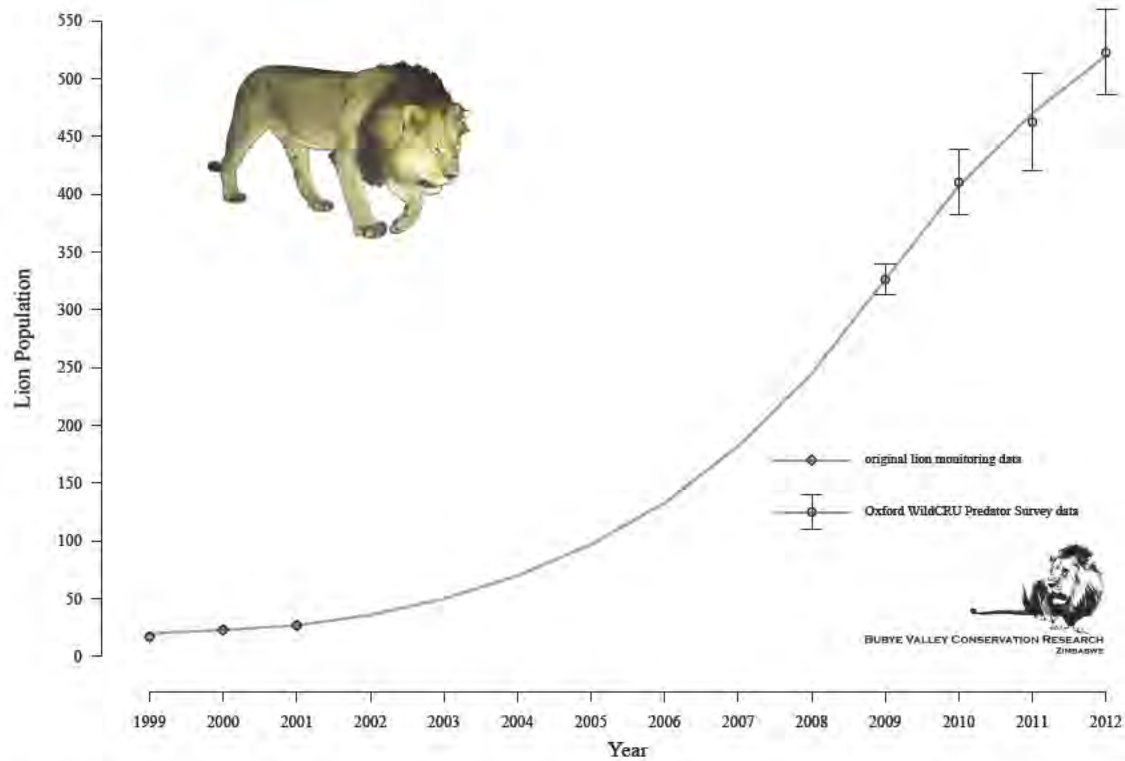


Figure 7: The Buby Valley Conservancy lion population has grown exponentially since the reintroduction of lions in 1999. Diamonds represent the known lion abundance from monitoring of the original individuals introduced; Points indicate lion abundance calculated from spoor transect analyses; error bars represent the standard error of the mean.

Table 4: *Summary of the Buby Valley Conservancy support to the surrounding local communities (2011 - 2015)*

Boreholes:	<ul style="list-style-type: none"> - 1 x Jompembi Village 2 - 1 x Penemene - 1 x Jompembi Village 4 - 1 x Nyimani village (Mwenezi) - 1 x Driehoek School - 1 x Mgaladivha School - 2 x Mtetengwe to supply water to the clinic site - 2 new bush pumps (complete) purchased and installed at Village 2 & Village 3 and troughs built at both sites <i>Drinking trough for cattle built at Village 2 borehole</i> <i>All boreholes equipped with new bushpumps, piping and cylinders</i> <i>Boreholes at Village 3, Mtetengwe, Mdzwiti, Vumani and Penemene and Makado Police post repaired and maintained</i> <i>All new piping and pumps etc. are supplied by BVC</i>
Buildings:	<ul style="list-style-type: none"> - Mtetengwe Clinic's main building built - 3 x F13 staff houses built <i>Clinic and House fenced - everything funded and built by BVC</i> <i>The clinic is a standard large Government clinic - male & female wards + maternity ward and outpatients</i> <i>Storerooms, offices etc. also built</i> <i>All houses and buildings are electrified, painted and supplied with running water</i> - Mtetengwe School school office block and staff room built and painted <i>All classroom windows repaired and the schools second borehole repaired.</i> - Secure engine house was built at the second borehole site - Borehole equipped with BH15S mono pump unit driven by a rebuilt Lister LT 1 engine - 5000 litre header tank and stand erected - new 5000 litre header tank purchased and fitted - pipeline laid to connect the borehole to the clinic - another pipeline connected to the same borehole to supply the Mtetengwe school with fresh water - New coldroom and refrigeration unit purchased and fitted at the Lutumba butchery <i>Part of aid program to get the Beit Bridge RDC self funding projects up and running</i> - New coldroom and refrigeration unit was purchased and fitted at the Rutenga butchery <i>Part of aid program to get the Mwenezi RDC self funding projects up and running</i>
Meat Donations:	<ul style="list-style-type: none"> - BVC donates meat on a regularly basis to the Mwenezi Orphanage - Numerous donations of meat were made to support school sports days & speech nights/prize giving events <i>Both Beit Bridge & Mwenezi districts</i> - 1600 kgs of meat has been donated each month since July 2011 to a Maranda trust <i>Administered by Chiefs and local headmen</i> <i>Excess meat sold and funds used for community projects</i> <i>Classroom roof replaced at Vhongwe school</i> <i>4 new classroom blocks constructed at other schools using funds from these monthly allocations</i> - 1000 kgs of meat per month is been donated to Beit Bridge communities since April 2014 - 1000 kgs of meat per month is been donated to Mwenezi communities since August 2013
Miscellaneous:	<ul style="list-style-type: none"> - Sports uniforms for the Penemene school team purchased (\$2600) <i>Sports uniforms required for inter-schools sports</i> - Transport the soccer teams representing Mgaladivha, Jompembi and Tongwe <i>To Lutumba for the inter-school competitions</i> - 2 sets of soccer goal posts & 2 sets of Netball poles were made for Mgaladivha School <i>New soccer field graded by BVC</i> - 2m security fencing supplied to Penemene School - Second hand door and window frames donated to Mapiri school (ex Mazunga School) - 1 new 3 1/2 " rod pump cylinder was purchased and fitted to the Vumhani borehole <i>All repairs to b/holes in the Vumhani area are done by BVC</i> - 26 bags of cement were donated to Mgaladivha School - Fencing donated to the Mgaladivha School - Supplied 10 x 5/8" mono shafts for the Botalele Clinic (Maranda) borehole - Water supply to Mlelezi Clinic - 400 m pipeline laid to supply the Nyimani Villarge's cattle with water <i>3.5 m drinking trough build for this same project</i> - 60 bags cement donated to the Welkom for repairs to a dam wall - 6 loads of riversand and 20 cement donated to Vumani Preschool - Various school renovations in both the Beit Bridge and Maranda areas
Current Projects:	<ul style="list-style-type: none"> - Construction of a School admin block at Mgaladivha School - Supply of 24 loads of riversand to Mdzwiti School (value \$1200) - All roofing materials supplied to Mdzwiti School - Supply roofing materials, cement, all window and door frames for Vumani Preschool

THE SAVÉ VALLEY CONSERVANCY

History of the Savé Valley Conservancy

The Savé Valley was a wildlife-rich wilderness until the early 1900's, when the first cattle ranching initiatives started in the area. The establishment of Devuli Ranch and Angus Ranch in 1920 paved the way for seven decades of commercial cattle ranching in the area we know today as the Savé Valley Conservancy. Roads were cut, fences erected and an everlasting 'battle' ensued against the wildlife, especially against all predators.

The large predators, especially lions, were virtually eradicated (Pole 1999). However, by the late 1980's, declining range productivity, depressions and droughts forced the landowners to consider alternative options. Around that time, empirical evidence of the competitive advantage of wildlife over livestock began to emerge (Child 1988; Bond 1993), especially in arid areas (Jansen et al 1992; Cumming 1993), and wildlife was finally given serious consideration as a viable land use option.

In 1989, a proposal was drawn up (du Toit 1989) to turn what was then the Sabi Valley Intensive Conservation Area into a wildlife conservancy. The plan was to create a single large wildlife area, especially for the re-establishment of endangered species and overexploited species, with cattle remaining the primary income generator. The Savé Valley Conservancy was constitutionally inaugurated in June 1991, and following the severe 1991/1992 drought, wildlife ranching became the primary land-use. At the time this was the largest private wildlife conser-

vancy in the world (3,410 km²).

The conservancy members then restocked the wildlife, removed all internal fencing, erected a common perimeter fence and developed effective security systems. A double, electrified, veterinary-approved fence was completed in 1995, and the following decade saw a massive investment in wildlife re-stocking and security systems.

Sport-hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, re-stock game, and improve security, especially because of the significant numbers of black rhinoceros now found there. Gradually, some of the ranchers shifted more into ecotourism. One property, Senuko Ranch, completed a 16 bed up-market lodge with a view of marketing non-consumptive safaris, offering game drives and bush walks and specializing in rhino walks and African wild dog *Lycaon pictus* den visits. Lodge occupancy rose from 0% in 1996 to 62% by the end of 1999.

However, the Zimbabwean land reform program, which was initiated in February 2000, soon made a strong negative impression in the international community, and resulted in travel bans and warning from most of Zimbabwe's source markets. This, together with the political instability meant that the wildlife industry and ecotourism industry collapsed over-night: sport-hunting became the only economically viable land use option, and has remained the only tangible source of income to the landowners of the Savé Valley Conservancy. In the case of the Senuko Lodge, for example, the land reform program resulted in a 98% cancellation of

the confirmed bookings. After four years of seeking alternative markets, the lodge could achieve no higher than 17% occupancy, and in 2005 moved back into a hunting-based operation.

A more direct impact of the land reform program for the Savé Valley Conservancy was the loss of 33% of the area of the conservancy to invading subsistence farmers (Lindsey et al 2008). The loss of land was catastrophic and the related pressure from wire snare poaching was extreme. In the following eight years (2001 to 2009), 10,520 illegal hunting incidences were recorded, 84,396 wire snares were removed and at least 6,454 wild animals killed (Lindsey et al. 2011).

Savé Valley Conservancy Community Support and Anti-Poaching

In 2012, conservancy members provided over US\$ 100,000 worth of support to adjacent villages or farmers in the resettled areas. Assistance included drilling boreholes, maintaining boreholes, dredging of dams, assisting with building projects in clinics and schools, assisting with repairs, maintenance and materials at schools, education initiatives, school field trips, provision of computer equipment in schools, craft programs and regular donations of meat.

Moreover, the conservancy recently entered into a mutually dependent agreement with the Chiefs representing the communities surrounding the Savé Valley Conservancy. The agreement links the communities to the Natural Resource Utilisation that occurs through the business operation of the conservancy and opens up opportunities for the local indigenous populations to share in any wealth creation. This agree-

ment strengthens relations between the conservancy and the surrounding local communities and creates an environment that helps to protect, conserve and sustain the natural assets of the area. The hunting tourism of the conservancy is currently the only form of income by which the surrounding communities can benefit. Revenues from trophy lion hunting constitute a significant portion of inflow and thus an important part of the community benefits. Any reduction would seriously jeopardise the growth of this infant positive relationship and community empowerment initiative.

The Savé Valley Conservancy is thus pioneering private-community partnerships in Zimbabwe, and trade restrictions on lion trophies will indirectly adversely affect these already seriously impoverished communities through a reduction in available income to share with communities. This is very likely to have a knock on impact on the lions themselves with a significantly reduced tolerance and an increase in retaliatory poisoning of lions for livestock predation. Without a demonstration of income from lions, the political pressure from the surrounding communities to remove them from the conservancy altogether will be a challenge to resist.

Savé Valley Conservancy Lion Monitoring and Management

After the Conservancy was formed, and persecution stopped, lions, mainly males, recolonized the area and their numbers started to increase in the late 1990's / early 2000's. Few lionesses were observed until 2003, when small family groups and male-female pairs were seen, and by 2004 - 2005 there were some reports of cubs. During this period 13

lions were also reintroduced into the Savé Valley Conservancy. After an initial lag phase the lion population on the Savé Valley Conservancy has increased dramatically and at present is growing exponentially (Figure 8; Groom and Watermeyer 2015).

Monitoring of the lion population began in 1999 (Pole 1999) with track index or call-up surveys being conducted sporadically until 2006. From 2007 to present, annual conservancy-wide track index surveys have been conducted using a standardized methodology (Groom and Watermeyer 2015). The resulting population estimates were verified in 2011 by a baited lion call-up survey and a collation of managers' estimates, all of which provided similar results.

Prey availability models (Hayward et al. 2007) suggest that the carrying capacity for the lion population in the Savé Valley Conservancy is approximately 271 lions. The population estimate for 2015 was 284 lions, suggesting lions have reached their ecological carrying capacity, even whilst being responsibly hunted.

A professional lion management plan was commissioned by the conservancy in 2011 (Funston 2011), to provide the Savé Valley Conservancy members with a science-based

plan to help them ethically and sustainably manage their lion population. This plan specifically advocates the use of hunting as a conservation management tool. It also demonstrates willingness by the conservancy to guide their lion management based on science and advice from professionals.

Savé Valley Conservancy Lion Hunting

Lions have been hunted in the Savé Valley Conservancy since 2002, although that was largely for removal of problem animals. Hunting began properly in 2005 with quotas increasing annually to a maximum of seven per year from 2009 onwards (Table 5), with the quota being raised to ten for 2016 based on trophy ages.

Despite offtakes of lions through sport-hunting, the lion population has continued to increase in the Conservancy. The revenue generated from hunting lions has enabled landowners to invest in proper land management, anti-poaching, water provision and fence maintenance, all of which benefit the lion population (especially as lions seem to be vulnerable to being caught in wire snares; Becker et al 2013; R. Groom, pers. obs.).

Table 5: *The Savé Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	5	5	1	3	3	4	6	7	7	7	4	2	3	5
Quota taken	1	0	1	3	3	3	3	6	5	3	4	1	3	5
Percentage success	20	0	100	100	100	75	50	86	71	43	100	50	100	100

Sport-hunting of lions brings considerable revenue to the Conservancy, revenue that is vital for the continued functioning of the area for wildlife conservation. Without the costs of lions being offset by the income

from sport-hunting, landowners cannot reasonably be expected to tolerate such high lion densities, and their numbers would have to be reduced significantly.

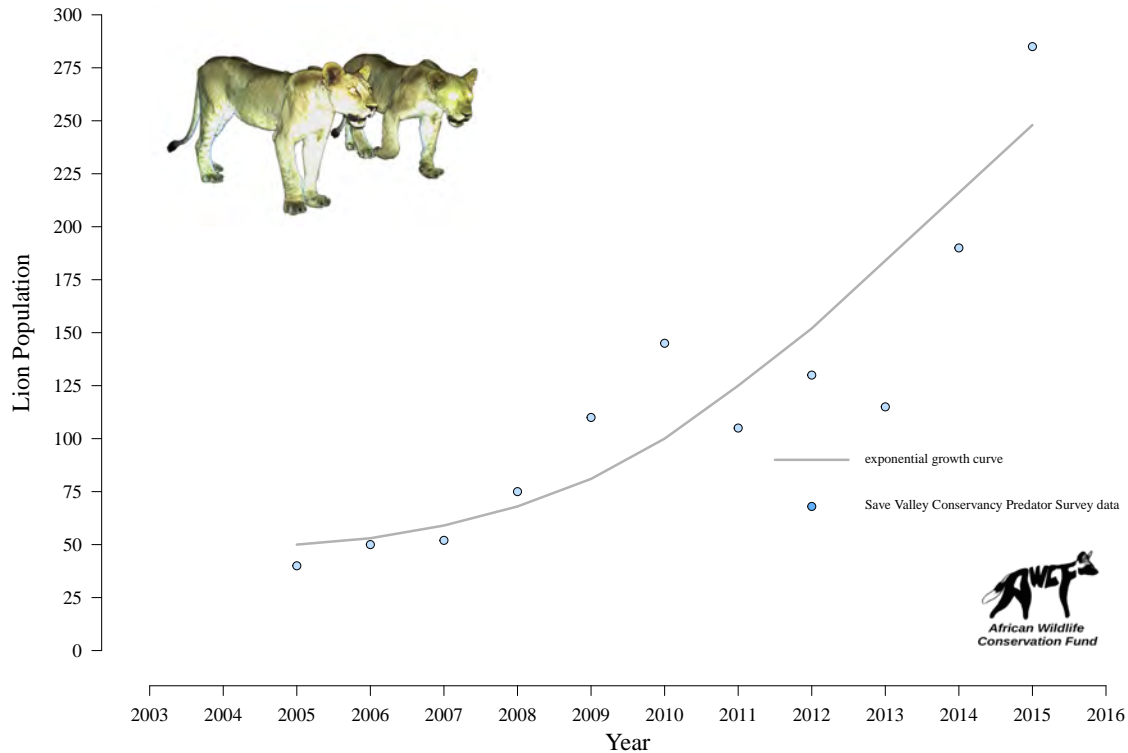


Figure 8: The Savé Valley Conservancy lion population, like that of the Buby Valley Conservancy, has grown exponentially. Points indicate estimated lion abundance calculated from field surveys; the line represents the exponential growth curve.

THE PROS AND CONS OF CONSERVING LIONS

The saturation of lions in wildlife areas on both state and private land is positive for their future conservation security; but it is also critical to that of incidentally conserved endangered species, such as both species of rhinoceros on private wildlife conservancies in Zimbabwe (Lindsey et al. 2009; Suzuki 2001), which benefit from the same resources and protection that are incentivised and provided by the revenue generated from sport-hunting. The Bulye Valley Conservancy now boasts the world's third largest black rhinoceros population (N. Anderson [Lowveld Rhino Trust], pers. comm.), which is classified as Key 1 by the African Rhino Specialist Group and means that this population is considered key to the overall survival of the species. The Save Valley Conservancy has the second largest black rhinoceros population in Zimbabwe after Bulye. These are not coincidences. These rhinoceros (and other endangered species, such as wild dog) strongholds are the result of the incidental conservation benefits derived entirely from sport-hunting activities - there are no photographic tourists visiting either the Bulye Valley or Save Valley Conservancies, and the rhinoceros are not hunted. Having rhinoceros on the land therefore generates no revenue - and in fact there is a significant cost associated with protecting these animals; US\$ 590,000 (not including incentive and reward bonuses donated for these purposes) was spent on anti-poaching by the Bulye Valley Conservancy during 2015 (K. Leathem, pers. comm.), and US\$ 546,000 is spent annually on anti-poaching by the Save Valley Conservancy (Lindsey et al. 2012). This expense is covered mainly

by the revenue generated by sport-hunting with additional donations from the clients; and most importantly, the habitat for the rhinoceros is preserved by maintaining the land as a conservation area, as opposed to converting it into agricultural or grazing land for example.

However, the high densities of lion populations achieved within commercial wildlife areas have the potential for intense intraguild persecution. Lions are aggressively competitive, and research on the relationship between lions and leopards has shown that high densities of lions can negatively affect leopard population density, demographic structure, cub survival, and spatial ecology down to even the step-wise decisions that leopards make regarding habitat use and behaviour based on both the actual and potential risk of encountering lions (du Preez 2014; du Preez 2015). Leopards are a generalist species that are able to cope with persecution by adapting their behaviour and ecological niche, and even they suffer under a burgeoning lion population; ecological specialists and endangered species, such as cheetah *Acinonyx jubatus* and wild dog, do not fare nearly as well under such intense competitive pressure. In fact, competition with lions has been directly linked to reductions in cheetah (e.g. Durant 1998, 2000; Laurenson 1995) and wild dog (e.g. Creel 2001; Creel and Creel 1996; Vucetich and Creel 1999) densities, both of which face local extinction where lion abundance, and the respective level of persecution, is high. Excessive lion densities may also result in population declines of ungulate prey (e.g. Wegge et al. 2009). It is vital to holistic conservation that wildlife managers can understand and deal with the level of impact that lions exert on other species; particularly those that

are elusive difficult to observe, and which face decline if not carefully monitored. To this end, a conservation research initiative in partnership with WildCRU was established on the Buby Valley Conservancy in 2009, and research conducted on the Savé Valley Conservancy since 2007.

Based on the number of kills made (du Preez et al. in prep.) and the current value of the meat (K. Leathem, pers. comm.),

the Buby Valley Conservancy lion population consumes hundreds of thousands of dollars worth of prey each year. These lions are mainly tolerated because of their ability to generate the revenue that helps to offset this expense - although it is estimated that economically it is still not worth keeping the lions whose cost outweighs their value (Funston et al. 2013).

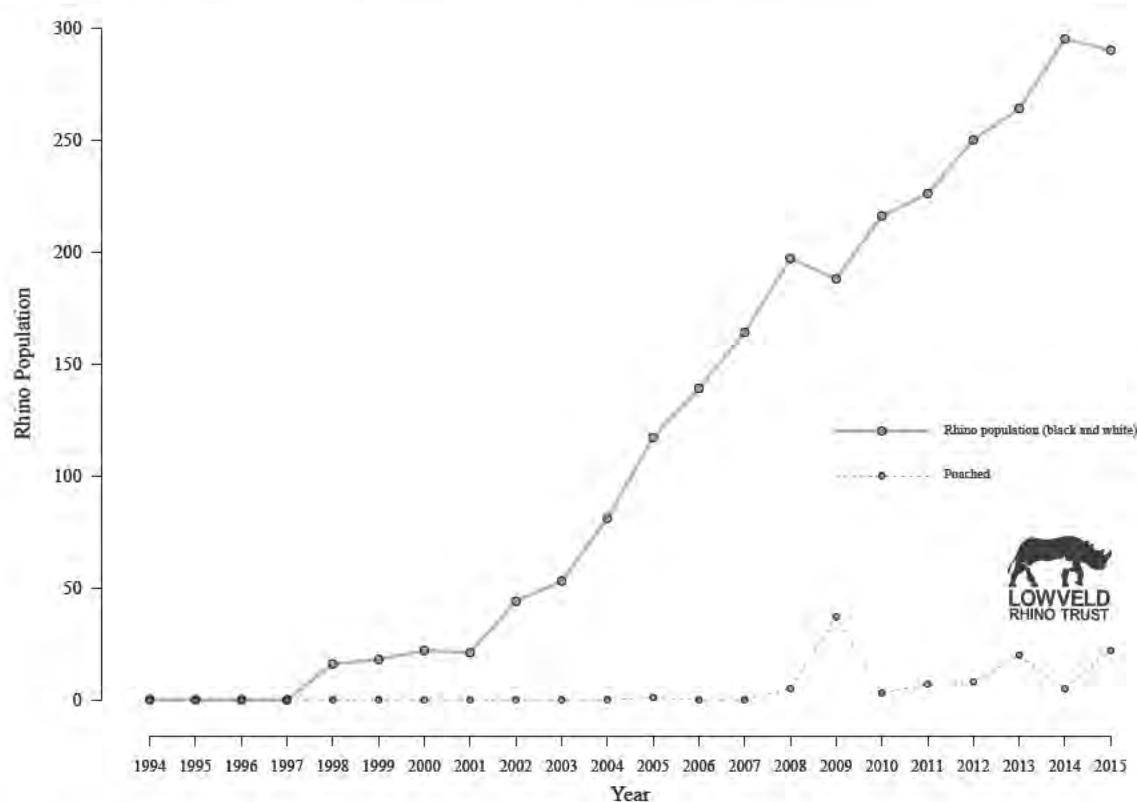


Figure 9: The Buby Valley Conservancy black rhino population is rated as Key 1 by the African Rhino Specialist Group which means that the population is considered key to the overall survival of the species.

WHERE THE MONEY GOES: THE FINANCES OF LION SPORT-HUNTING AND REINVESTMENT IN THEIR CONSERVATION

Break-down of the finances involved in a typical lion hunt on the Buby Valley Conservancy:

Lion Trophy fee: US\$ 42,000

Lion Hunt Daily rate: US\$ 2,950 day⁻¹

(Minimum lion hunt duration: 18 days [*total daily rate of US\$ 53,100 lion hunt⁻¹*])

Additional costs include:

ZPWMA scout

Observers

Bait used

Other trophy species taken during the lion hunt, etc.

[*These additional costs average approximately US\$ 6,500 lion hunt⁻¹*]

BUBY VALLEY CONSERVANCY - LION SPORT-HUNTING REVENUE GENERATED (2015):

$$\begin{aligned} & ((18 \text{ days} \times 2,950 \text{ day}^{-1}) + 42,000 \text{ trophy fee} + 6,500 \text{ additional costs}) \times 12 \text{ lions} \\ & = \text{US\$ } 1,219,200 \end{aligned}$$

Lion sport-hunting therefore represents approximately 33.9% of the Buby Valley Conservancy's total annual revenue generation (which includes post-hunt meat and hide sales).

All of the revenue generated from lion sport-hunting on the Buby Valley Conservancy has gone back into the running costs of the Conservancy, which is all part of conservation, and which includes: anti-poaching and fence monitoring and maintenance (approximately US\$ 506,000 year⁻¹), research (approximately US\$ 34,700 year⁻¹ not including client and sponsor donations), and community support assistance (approximately US\$ 210,000 year⁻¹).

[*No profit after costs has been declared, nor dividends taken by shareholders, since the Buby Valley Conservancy was formed in 1994. All revenue generated to date has been spent on running costs, improvements and restocking.*]

DISCUSSION

Here we have shown that since their reintroduction after historical eradication, both the Buby Valley and Savé Valley Conservancies' lion populations have increased exponentially - not despite sport-hunting, but because of sport-hunting and the incentive it provides for protection.

The success of the Buby Valley and Savé Valley Conservancies, in terms of both of their hunted lion and non-hunted rhinoceros populations, may also provide the motivation for other areas in the country to sustainably manage their wildlife resource. A case in point is the Nuanetsi Ranch, a wildlife area that is also a legacy of failed cattle ranching, located almost directly between the Buby Valley and Savé Valley Conservancies in Zimbabwe (Figure 3). At present there is a single lion on the Nuanetsi Ranch but management is not able to justify introducing more due to the current uncertainty over the future of lion hunting (B. Lees-May [Nuanetsi Ranch Conservator], pers. comm.). The Nuanetsi Ranch is a wildlife area of 1,489 km², and could conceivably sustainably hold between 201 and 278 lions (based on the most recently estimated lion densities of the Savé Valley [0.135 lions km⁻²; Groom and Watermeyer 2015]; and Buby Valley [0.187 lions km⁻²; du Preez et al. 2015] Conservancies respectively). However, the Nuanetsi Ranch has invested in building up an abundant wildlife population, which is sport-hunted, and the management will not risk losing a significant amount of valuable game, that could otherwise be sold as trophies or meat, to a species from which it can not recuperate lost revenue, and instead that requires further investment in control measures (B. Lees-May [Nuanetsi

Ranch Conservator], pers. comm.).

Between 2005 and 2015 the United States market has represented 70.4% of the total Zimbabwean lion sport-hunting industry (http://trade.cites.org/en/cites_trade/ [accessed 2015-01-19]), though in reality it constituted over 90% for both the Buby Valley and Savé Valley Conservancies. If this market was effectively lost due an inability of prospective clients to import their trophies, based on the economics involved it would become unviable to continue managing the Buby Valley Conservancy as a wildlife area in its current form, and lions would either have to be re-exterminated, or at least severely reduced via culling; or else what is the largest privately owned wildlife area in the world would be converted back into a cattle ranching area (K. Leatham, pers. comm.). This is the reality of any business, in that it needs to cover costs and pay staff and cannot run at a loss for luxury of conservation. Child (1993) states “*A refusal to treat wildlife in the same way as other resources and maintenance of centralised protectionist management prejudices its survival. Only by raising its commercial value will wildlife be able to compete for space on the scarce African landscape. Trade bans which detract from wildlife’s commercial value prejudice its chances of survival in the long term*”.

Although the USFWS understandably categorises lion conservation by country for simplicity, rather than individual properties, the Buby Valley and Savé Valley Conservancies currently and deservedly hunt more than a third of the total Zimbabwean lion quota between them. Here we have shown that this sport-hunting does not negatively affect the lion population, which remains in positive growth despite off-take. In addition

to this, other areas, such as the Nuanetsi Ranch, could be incentivised to invest in lion conservation if the ability to sustainably utilise the lions as a resource was guaranteed.

The USFWS identified five primary factors that threaten lion survival in the wild, namely: habitat loss; loss of prey; retaliatory killing due to increased human-lion conflicts; inadequate regulatory mechanisms; and weak management of protected areas (<http://www.fws.gov/endangered/what-we-do/lion.html> [accessed 2015-01-19]). Each and every point on this list, which notably does not include sport-hunting, supports the fact that incentivising tolerance for lions through sustainable use would enhance the species' overall survival.

As responsible conservationists, we are not arguing against tight regulation of sport-hunting, especially with regard to sensitive species such as lions, and we support the need for transparency and accountability within the industry. However, this reform is a process being driven from within, as any indiscretion is an affront on all stakeholders. For example, long-term lion monitoring by WildCRU in Hwange National Park (HNP), Matabeleland North, Zimbabwe, documented a 'vacuum effect' and reduction in male lion density in the Park as a result of sport-hunting in the surrounding areas (Loveridge et al. 2007). A result of this research was the recommendation that ZPWMA implement a hunting moratorium in western Zimbabwe, which was accepted and enforced from 2005 to 2008 (Davidson 2009). Subsequent monitoring of the HNP lion population showed that the perturbation effects caused by sport-hunting were

reversed during the moratorium, and sport-hunting was reinstated at a reduced, more sustainable quota (Davidson 2009). This example demonstrates both the relationship between independent researchers and ZPWMA, and that the research assists ZPWMA in robust decision making. This study has also shown that the lion population was able to recover quickly, and that a blanket-ban would have been as unnecessary as it would have been detrimental to overall lion conservation in the country.

In addition to the self-imposed hunting moratorium in the Matabeleland North district, Zimbabwe has voluntarily stopped sport-hunting of any lioness. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season even began, and which was resultant attributed to poor quality trophies and young animals being hunted, has also been abandoned. The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have minimal ecological impact, being old individuals that are no longer contributing to the gene pool nor protecting cubs.

The IUCN Red List lion conservation status has remained unchanged for 20 years even in the face of Africa's ever-changing landscape. Despite fears that lion abundance is decreasing overall, in southern Africa it is in fact increasing (Bauer et al. 2015b).

CONCLUSION

Given the evidence presented, the arguments against sport-hunting would appear to be based more in emotion than logic and reality (e.g. Lindsey et al. 2015). Conservation, however, is not about individuals within populations, but the overall populations themselves. Sustainable sport-hunting of lions is just that: *sustainable* - and ironically, without it, the lions themselves become unsustainable. Conservation objectives need to be balanced with both social and economic factors if they are to be achieved.

The USFWS states “Well-managed conservation programs use trophy hunting revenues to sustain lion conservation, research and anti-poaching activities” (<http://www.fws.gov/endangered/what-we-do/lion.html> [accessed 2015-01-19]). The Buby Valley and Savé Valley Conservan-

cies both fully meet each one of these conditions: clearly contributing to lion conservation in Zimbabwe; having long-term conservation research programs; and self-funded anti-poaching units.

The histories regarding the formation of both the Buby Valley and Savé Valley Conservancies were both presented in this report, despite being remarkably similar; the point being that lion conservation in both areas, and many others, has the same fate either way. The Buby Valley and Savé Valley Conservancies are both excellent examples of focussed and determined efforts to make wildlife based land use viable in an otherwise cattle dominated landscape. However, the fact remains that the cost of having lions, both ecologically and financially, is high. Simply increasing the abundance of one species at the expense of another cannot be considered a conservation success.

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January 26, 2016

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Mr. Timothy Van Norman
Chief, Branch of Permits
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

Dear Chief Van Norman:

RCVD JAN 28 2016

LB

Enclosed please find four applications for permits authorizing the import of sport-hunted trophies of *P. l. melanochaita* from Zimbabwe. In evaluating these applications, please consider the information on lion conservation and management in Buby Valley Conservancy, Save Valley Conservancy, and Zimbabwe on the whole already submitted by Conservation Force and others. An index of this information is attached to this letter.

The information submitted by Conservation Force demonstrates that the lion conservation and management program in Zimbabwe, and specifically in Buby Valley and Save Valley Conservancies, enhances the survival of the species because it addresses the three main threats to lion: (1) loss of habitat, (2) loss of prey base, and (3) human-lion conflict, and more.

First, the information demonstrates that habitat would not otherwise exist for lion in Buby Valley and Save Valley Conservancies but for the income generated by tourist safari hunting. Both conservancies rely on the income from tourist safari hunting to fund their operations. If hunting stopped, the 1.7 million acres of habitat protected in these conservancies are likely to be lost to the lion, rhino, and prey species.

Second, Buby Valley and Save Valley Conservancies each engage in extensive anti-poaching operations that protect the lion's prey base. For example, in 2015, Buby Valley Conservancy spent \$590,000 on game scouts and anti-poaching. All of these funds were generated by tourist safari hunting.

Finally, the information shows the significant community assistance programs in place in each of these conservancies. Buby Valley Conservancy and Save Valley Conservancy each contribute \$100,000 annually to local communities in cash, services, game meat, and supplies. This support is used to build schools and clinics, maintain water infrastructure, assist with repairs and maintenance of equipment, fund school books and field trips, increase consumption of protein, and otherwise improve the quality of life for local residents. Because of these benefits, local people are more willing to tolerate lion, and human-lion conflicts are reduced.

We believe the information already in the Fish and Wildlife Service's possession satisfies the requirements of 50 C.F.R. § 17.40(r) for Zimbabwe. However, we will continue to submit information about the benefits generated by safari hunting as it becomes available.

Sincerely,

John J. Jackson, III on behalf of
Conservation Force

Enclosures:

- Application submitted on behalf of Steven Chancellor for a sport-hunted lion trophy to be hunted in Buby Valley Conservancy, Zimbabwe
- Application submitted on behalf of Kent Greenawalt for a sport-hunted lion trophy to be hunted in Buby Valley Conservancy, Zimbabwe
- Application submitted on behalf of James Horrocks for a sport-hunted lion trophy to be hunted in Buby Valley Conservancy, Zimbabwe
- Application submitted on behalf of Jeffrey Smithers for a sport-hunted lion trophy to be hunted in Buby Valley Conservancy, Zimbabwe
- Index of Documents Submitted

NEW INFORMATION ON THE AFRICAN LION

INDEX FOR: ZIMBABWE

No.	Title	Sent to FWS
1	Zimbabwe Parks & Wildlife Management Authority, Conservation Status of the African Lion (<i>Panthera leo</i>) in Zimbabwe (January 2015)	1/11/16
2	Zimbabwe Parks & Wildlife Management Authority, Age Restrictions on Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe (2014)	1/11/16
3	Dr. Byron du Preez [Oxford], Buby Valley Conservancy Lion Research Report (Jan. 12, 2016)	1/12/16
4	Blondie (Mazunga Safaris), Email re: Community Assistance Program in BVC (Jan. 20, 2016)	1/26/16
5	Blondie (Mazunga Safaris), BVC – Spreadsheet, Community Assistance 2011 & 2012	1/26/16
6	Zig, Photos of BVC Community Assistance Program	1/26/176
7	ZPHGA, Info on Lion Age Restrictions (Jan. 20, 2016)	1/25/16 Louis M 1/26/16 Us
8	Dr. Byron du Preez et al., Sport Hunting and Lion (<i>Panthera leo</i>) Conservation in Zimbabwe (Jan. 22, 2016)	1/26/16
9	Dr. Rosemary Groom, Lion Hunting in Zimbabwe's Save Valley Conservancy (Jan. 27, 2013)	1/26/16



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

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

Federal Fish and Wildlife Permit Application Form

RCVD JAN 28 2016

LS

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

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

Threatened listed
Zimbabwe lion

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

A. Complete if applying as an individual			
1.a. Last name Horrocks	1.b. First name James	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number (b) (6) (home)	6.b. Alternate telephone number (b) (6) (mobile)	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 Highland	1.c. State Utah	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province (b) (6)	1.f. Country USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter (b) (6) Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief (b) (6) and that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.	
Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)	Date of signature (mm/dd/yyyy) 01/20/2016

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera leo melanochaita (African Lion)

b. Sex (if known).

Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

Zimbabwe - Bubye Valley Conservancy (850,000 acres), Beit Bridge District, Matabeleland South – GPS co-ords for Towla S21.26.478 , E 029.53.162. Nearest Town - Beit Bridge and nearest City - Bulawayo.

b. Date wildlife is to be hunted:

October 5th to 24th, 2016

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

Skin, skull, and claws for a life size mount

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

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

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: Stephen Collett
Business Name: Collett's Wildlife Artistry
Address: 15 Josiah Chinamano Ave.
Address: Belmont
City: Bulawayo
State/Province: Matabeleland South
Country, Postal Code: Zimbabwe, N/A

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

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

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

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

Taxidermist/Broker's signature: _____ Date: _____

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

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

Applicant's signature:  Date: 01/20/2016

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

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

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

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):

James (b) Horrocks, (b) (6) (hm), (b) (6) (work), (b) (6) (mobile), (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.

NOTICE OF REPRESENTATION

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

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

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion trophy at the following address:

John J. Jackson, III
Regina Lennox
Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: jjw-no2@att.net
E: regina.lennox@conservationforce.org

Signed: _____

Name: James R. Horrocks

Date: 01/19/2016

1-28-16

(b) (6)

HIGHLAND, UT

Pay to the Order of (b) (6)

one hundred fifty & 00/100

Jan. 17, 2016 Date

\$ 150⁰⁰

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Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe

Dr Byron du Preez^{†1}, Dr Rosemary Groom^{‡2}, Olivia Mufute^{§3} and
Roseline Mandisodza-Chikerema^{¶3}

¹Bubye Valley Conservation Research Initiative

²African Wildlife Conservation Fund

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January 31, 2016



*

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SUMMARY OF STEPS TAKEN BY ZIMBABWE TO IMPROVE THE MANAGEMENT OF LION SPORT-HUNTING

- i* – Banning of all lioness hunting in Zimbabwe
- ii* – Hunting moratoria around the Gonarezhou and Hwange National Parks
- iii* – Removal of fixed hunting quotas
- iv* – Age restrictions on sport-hunted lions
- v* – Scientifically-based adaptive quota management system

SUMMARY OF LION SPORT-HUNTING'S CONTRIBUTION TO CONSERVATION

- i* – Lion sport-hunting contributes 33.9% to 42.4% of total revenue on private land
- ii* – Lion sport-hunting generates up to US\$ 557 km⁻²
- iii* – Anti-poaching (in particular that of rhinoceroses) costs ~US\$ 216 km⁻²

INTRODUCTION

THE United States Fish and Wildlife Service (USFWS) have recently evaluated the conservation status of the lion *Panthera leo* with particular regard to sport-hunting (<http://www.fws.gov/endangered/what-we-do/lion.html> [accessed 2015-01-19]). The results of this evaluation have led to the formal protection of two subspecies under the Endangered Species Act, classifying *P. l. leo* as endangered and *P. l. melanochaita* as threatened. Together these subspecies apparently represent all of the lions in Africa (Barnett et al. 2014).

Sport-hunting is a legal activity in which the international import/export of trophies is both sanctioned and carefully controlled by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The USFWS found that the sport-hunting of *P. l. melanochaita* “if well managed, may provide a benefit to the subspecies” (<http://www.fws.gov/endangered/what-we-do/lion.html> [accessed 2015-01-19]). Here we explore this statement further, and present data from three long-term *in situ* lion research projects; the Buby Valley Conservation Research Initiative, Savé Val-

ley Conservancy Research, and the Hwange Lion Research Project.

The data presented in this report clearly illustrates the positive conservation benefit that well-managed trophy hunting of lions can have for the species, as well as the importance of hunting in maintaining the wildlife in an area; addressing Point 5 on page 3 of the Federal Fish and Wildlife Permit Application Form (Form 3-200-20) [i.e. “Please be

aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application”].



Figure 1: The lions pictured here, known as Winston (*standing*) and Geronimo (*lying*), were both collared in March 2012 when they were the dominant males in the Matombosa area and have been continuously monitored ever since as part of the on-going long-term WildCRU Buby Valley Conservation Research Initiative. In November 2015 Geronimo, who was approximately 9 years old, died after succumbing to injuries sustained from fighting with another male. Winston, also 9 years old, has since lost his dominant status, lost his territory to two 4.5 year old males, become nomadic and avoids contact with other males. As of this report being written, the recent litter of cubs that both Winston and Geronimo sired are still alive.

Most importantly, since July 2013 there has been a continuous self-imposed internal reform of the lion hunting industry in Zimbabwe that is actively participated in and supported by all of the relevant stakeholders, including; the Zimbabwe Parks and Wildlife Management Authority

(ZPWMA), non-governmental organisations, professional hunters, safari operators, scientists and researchers.

Here we discuss the results of this process in terms of robust evidence regarding the sustainability and self-regulation of lion hunting in Zimbabwe.



Figure 2: Winston and Geronimo's cubs.

LIONS – *Panthera leo*

The IUCN Red List have recently reclassified lions as Vulnerable (remaining as such since 1996; IUCN 2015), estimating that there are between 20,000 and 30,000 free-ranging lions left (Bauer et al. 2015a) in less than 25% of their historic range (IUCN 2006). However, this generalised classification does

not take into account an apparent conservation dichotomy: sample subpopulations of lions in Botswana, Namibia, South Africa and Zimbabwe have in fact increased overall (Bauer et al. 2015a). Lions were historically present throughout Africa, some of Europe, the Middle East and Asia (Bauer and Van Der Merwe 2004), but current conservation strongholds remain only in parts of eastern

and southern Africa (Brassine and Parker 2012; Nowell and Jackson 1996). The current lion population estimate for Zimbabwe's major lion areas is approximately 2,600 individuals [Hwange-Matetsi Complex: 750, South Eastern Lowveld: 350, Gonarezhou National Park: 60, Malilangwe: 37, Savé Valley Conservancy: 284, Bulyebe Valley Conservancy: 500, Mid-Zambezi Valley Complex: 600], though the actual number would be larger if there were data available for the countries minor lion areas that are yet to be surveyed] (ZPWMA 2015).

The lion is a uniquely social felid, forming coalitions of up to nine males associated with one or more female prides that may consist of more than 20 individuals (Macdonald et al. 2010; Schaller 1972). Lions are infamously infanticidal (Schaller 1972), where males will kill unrelated cubs so as to bring the female into oestrus and present an opportunity to sire their own litter, which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2010), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, does not result from sport-hunting when age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004). Moreover, the fission-fusion nature of lion society (Mosser and Packer 2009; Pusey and Packer 1987) means that infanticide may still occur when the dominant males are simply not present there and then to defend their cubs (B. du Preez, pers. obs.).

In the 1990's, lions were successfully reintroduced into private areas in parts of their

former range, where they achieved high reproductive and survival rates (Miller and Funston 2014). However, the resultant population growth inevitably led to the potential problem of overabundance (Funston 2008) and low genetic diversity (Trinkel et al. 2010), with both of these issues requiring active and intensive management (Hunter et al. 2007) and ultimately reducing the conservation value of these lion populations (Miller and Funston 2014). The ability to translocate lions originally facilitated the relief of overpopulation, but as the available areas for relocations were used up, sport-hunting and euthanasia have subsequently become the main methods of lion population control (Miller and Funston 2014).

The lion is the apex predator wherever it occurs (Macdonald et al. 2010), and is an ideal conservation umbrella; being large, charismatic and easily observable (e.g. Williams et al. 2000). Lions are important to commercial wildlife ventures, which risk losing significant market share where they cannot offer them to clients (Lindsey et al. 2007), and are thus prioritised in conservation; exploiting their charisma to attract tourists and raise the funds required in ensuring that wildlife areas remain viable. The lion is also a particularly valuable species in the sport-hunting industry, rivalled only in demand by buffalo *Syncerus caffer* and leopard *Panthera pardus* (Creel and Creel 1997), and are therefore prevalent in private wildlife areas (Packer et al. 2013) where their populations can achieve exponential growth rates given the protection and resources afforded by well-managed operations (Smuts et al. 1978; Loveridge et al. 2007b; Kettles and Slotow 2009; Miller and Funston 2014).

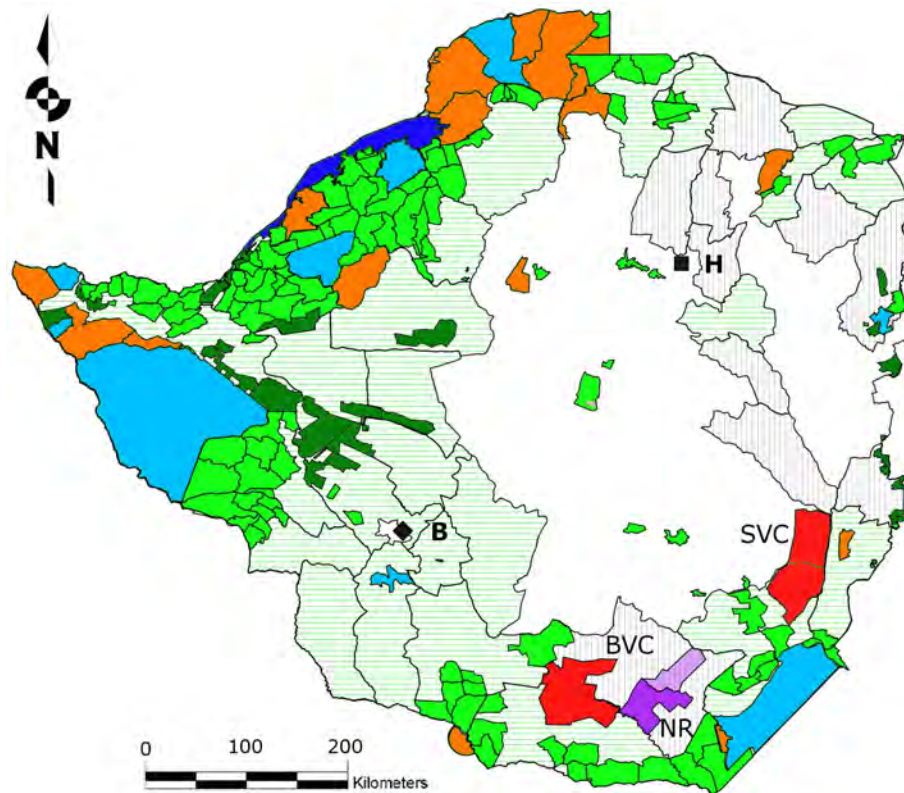


Figure 3: Map of Zimbabwe's main wildlife areas: [i] National Parks are represented in light blue; [ii] Safari areas are represented in orange; [iii] Forestry areas are represented in dark green; [iv] Community and Private wildlife areas are represented in light green; [v] Communal Land (CAMPFIRE Areas) in which sport-hunting may occur is represented by light green horizontal stripes; [vi] Communal Land in which sport-hunting does not occur is represented by grey vertical stripes. [vii] The Bulyana Valley [BVC] and Save Valley [SVC] Conservancies are represented in red. [viii] The Nuanetsi Ranch [NR] on which sport-hunting takes place is represented in dark purple (light purple represents the Nuanetsi Ranch cattle area); [ix] Lake Kariba is represented in dark blue. Harare (the capital city) is represented by a black square and letter 'H'. Bulawayo is represented by a black diamond and letter 'B'. Sport-hunting may occur in areas: ii, iii, iv, v, vii & viii

The ability of lions to rapidly increase in abundance is an aspect of their ecology that is often overlooked. Lion populations can achieve exponential growth rates (Miller and Funston 2015; Groom and Watermeyer 2015; du Preez et al. in prep.), and the problems associated with high lion densities fast present themselves and require significant

investment in their solution (Hunter et al. 2007; Kettles and Slotow 2009; Loveridge et al. 2007; Packer et al. 2013; Smuts 1978). Whilst unregulated sport-hunting of lions (in particular that of dominant males and pride females) may result in population declines (e.g. Packer et al. 2010; Packer et al. 2009), restricting off-take to only males over

a certain age (i.e. have already bred and/or are no longer dominant) has no impact on lion population persistence, irrespective of quota size (Whitman et al. 2004). Such is the situation currently facing both the Bulye Valley and Savé Valley Conservancies, where the lion populations continue to grow despite sport-hunting and increasing quotas. Whilst sport-hunting may not alleviate over-population in these areas, it does somewhat offset the cost of keeping lions. Culling of lions may be the only realistic option for controlling numbers in larger areas, as the use of contraceptives is likely to be inefficient and expensive. Because of fears about public sentiment associated with sport-hunting, it has now become common practice for managers to cull excess lions in more than 45 wildlife areas in South Africa to which lions have been introduced, and which resulted in the wasteful destruction of about 200 lions in 2012 (Miller and Funston 2014).

CONSERVATION AND SPORT-HUNTING

There is more land area in Africa conserved for hunting than there is in all of Africa's formally protected areas combined: approximately 1.4 million km², which exceeds the total area covered by national parks by 22% (Lindsey et al. 2007). For wildlife conservation to be successful outside of national parks, these areas must be self-sufficient and able to generate sufficient revenue to cover the considerable costs of protecting the habitat and wildlife therein (Lindsey et al. 2006). Indeed, conservation would benefit from an incentive to utilise land for wildlife rather than the alternatives of livestock grazing, agriculture, and deforestation.

The international trade of lions, including trophies, is controlled by a strict CITES licensing system on the basis that this trade does not endanger the ultimate survival of the population (<https://www.cites.org/eng/disc/how.php> [accessed 2015-01-19]). The positive aspects of sport-hunting as a conservation tool include a focus on males and a low percentage off-take; neither of which generally jeopardise populations, and also suggest that hunting could play a role in population recovery (Leader-Williams et al. 2005).

The recommendation of setting uniform harvest limits, e.g. 1 lion 2,000 km⁻² (Lindsey et al. 2012; Packer et al. 2010), may be overly simplistic, affect the economics of wildlife based landscape use, and disincentivise investment in conservation (Lindsey et al. 2007). A more practical approach to sustainably setting realistic lion sport-hunting quotas could involve using a positive/negative feedback method that calculates a fluid quota per area based on the previous season's performance. Such an adaptive quota management system has already been implemented in Zimbabwe.

ZIMBABWE'S ADAPTIVE LION QUOTA MANAGEMENT SYSTEM

An adaptive quota management system for lion hunting based on the ages of lions hunted was agreed on in July 2013 in Harare, Zimbabwe, during a meeting hosted by the Zimbabwe Parks and Wildlife Management Authority (ZPWMA) and an independent non-governmental conservation organisation. The points system is summarised in Table 1.

Table 1: *Points allocated to hunting blocks arising from the harvest of lions of different ages*

	≥ 6 years	No trophy	5 years old	4 years old	< 4 years	Failure to submit return, or incomplete return
For quotas of ≥ 3	4	3	3	2	-3	0
For quotas of 2	4	3	3	2	0	0
For quotas of 1	6	3	3	2	0	0
Resultant quota	<i>These points are added up and divided by 3 to yield the quota for next year</i>					

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the system up and running. In 2014 operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015. The 2015 lion hunt results would thus also determine the 2016 quota.

Results of the Adaptive Lion Quota Management System

In 2015 there was a marked increase in the age of lions hunted in Zimbabwe as a whole. Notably, only one lion of < 4 years of age was hunted and the large majority of lions were 5 years or older (Figure 4). In 2013, only 28% of the lions hunted were 5 years or older, in 2014 that figure had risen to 49% and in 2015 to 77.3% (Figure 5). The proportion of lions hunted that were less than 5 years of age dropped overall between 2013 and 2015 (Figure 6). For this achievement, credit is due to the hunting community for showing greater selectivity of harvest. A word of caution however, is that the majority of lions hunted were on the cusp of 5 - 6 years of age and were not older than six years. Restricting hunting to individuals that are at least

six (and preferably older) is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

In 2015 the Zimbabwe national lion hunting quota was set at 85 lions. Of this 85, only 39 were hunted in 2015, and based on the resultant score from aging the trophies, and the fact that operators chose not to hunt lions of inadequate age (see Figures 4, 5 & 6), the recommended quota for 2016 was set at 75 [Harare 2015-11-11]. (The Rural District Council areas in which lions occur are currently exempted from the age restrictions, as was agreed upon at the 2013 lion management meeting in Harare, as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognising the potential negative impacts the species has on the livelihoods of livestock farmers).

Using these figures and estimating the average value of a lion safari at approximately US\$ 80,000 then a 50% offtake (35 lions) would generate US\$ 2,800,000 annually. If management costs are approximately \$150 km⁻² (V. Booth, pers. comm.), then the lion safaris alone can support 18,600 km⁻² of wildlife habitat in Zimbabwe.

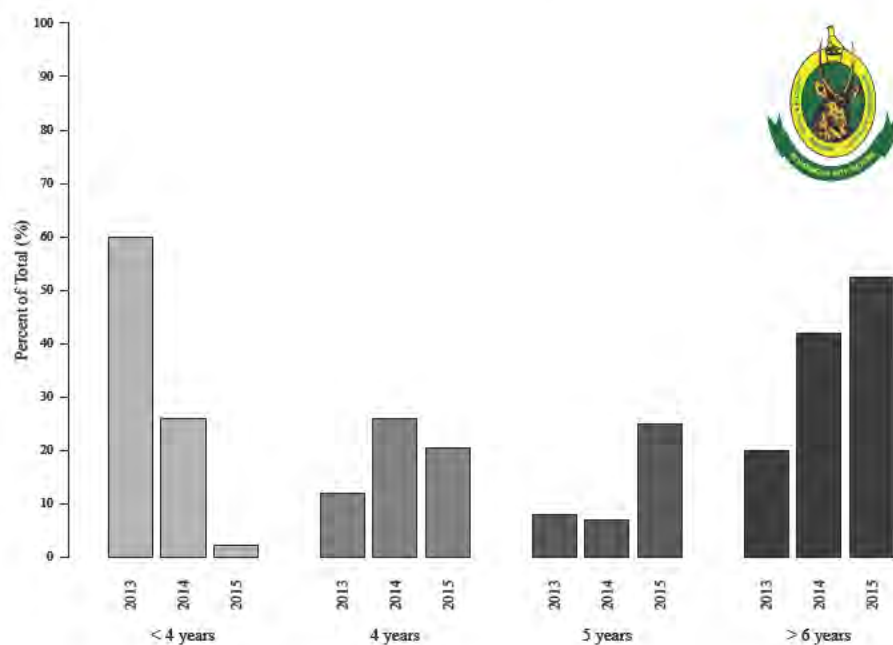


Figure 4: The percentage of lions hunted in each age class in 2013, 2014 and 2015 in Zimbabwe.

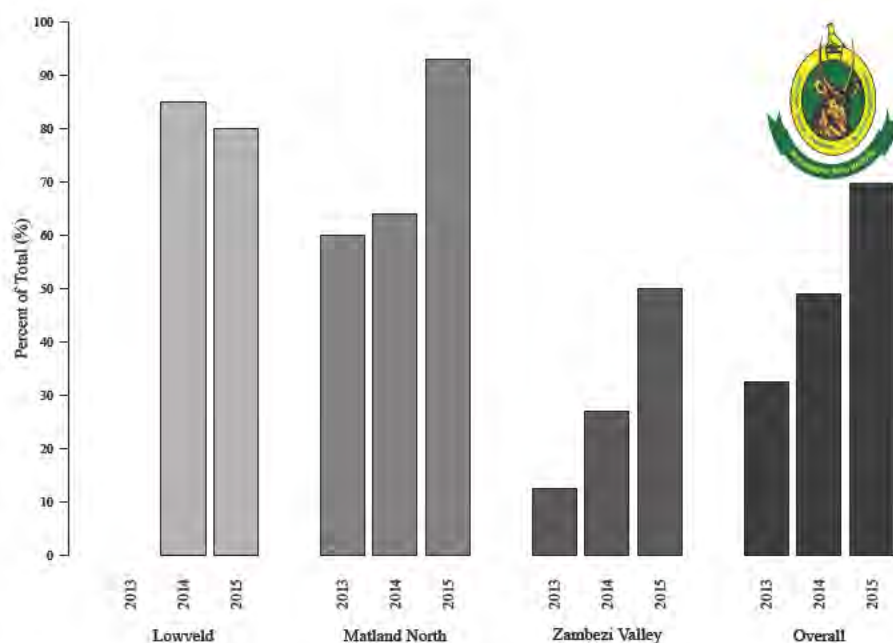


Figure 5: The proportion of lions hunted that were 5 years or older in the three main lion-hunting areas of Zimbabwe.

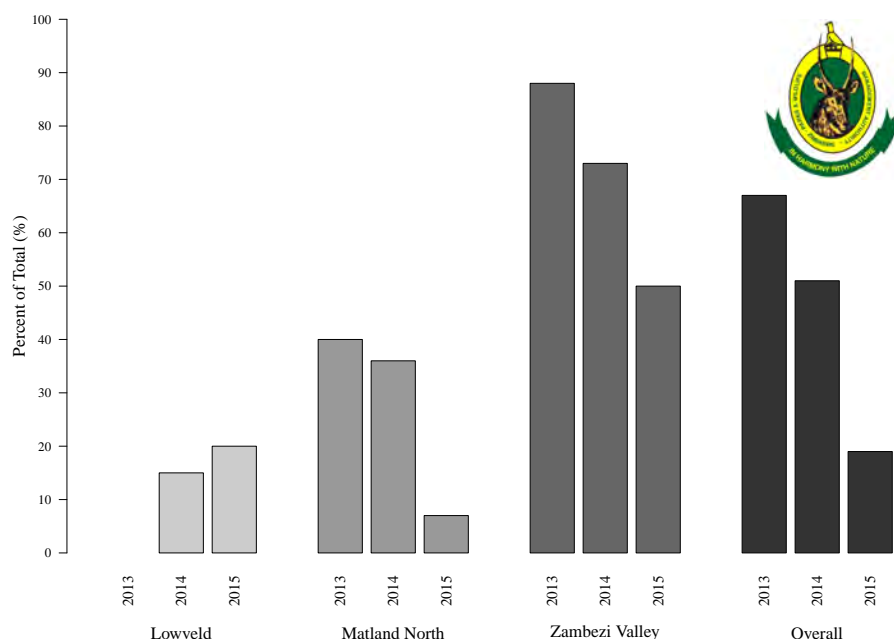


Figure 6: The proportion of lions hunted that were less than 5 years of age in the three main lion-hunting areas of Zimbabwe.

Table 2: *Human and Lion Conflict (2009 - 2011) in Zimbabwe, including human mortality caused by lion (CAMPFIRE Association, 2012)*

District	Total incidents	Livestock killed	People Injured	People Killed
Hurungwe	5	1	2	2
Chiredzi	25	136	0	0
Mbire	5	7	0	5
Binga	9	39	0	0
Total	44	183	2	7

Human-Lion Conflict

The lion is a flagship species and powerful symbol of Africa; yet living with lions poses hardships for many communities (e.g. Table 2). In some areas, the lion is a major predator on domestic livestock, inevitably leading to conflicts with local herders. Both sides suffer in this situation.

Outside of protected areas, the lion's prey base is much reduced, which results in relatively greater chance of encountering live-

stock. Co-existence of lions with people may be enhanced by giving value to lions through tourism and hunting promoted in communal lands under the Communal Area Management Programme for Indigenous Resources (CAMPFIRE). This hunting contributes to the conservation of lions via the financial revenue generated, which is ploughed back into conservation of the resource and empowers local communities to invest in their own rural development programs.

THE BUBYE VALLEY CONSERVANCY

History of the Buby Valley Conservancy

Towards the end of the nineteenth century, the Liebig's Extract of Meat Company (LEMCO) founded an extensive cattle ranch in the Zimbabwean lowveld, to the detriment of the indigenous wildlife that was initially eliminated because of competition for grazing with the livestock, as well as a risk of disease transmission from buffalo and wildebeest *Connochaetes taurinus*. As their natural prey base became depleted, the predators were subsequently persecuted when they began to prey on the livestock. Some wildlife persisted in small pockets of remote habitat, however lion, elephant *Loxodonta africana*, buffalo and rhinoceros *Diceros bicornis* [black] & *Ceratotherium simum* [white] were all completely eradicated. A monoculture of cattle dominated the landscape and impacted on the environment for the better part of a century.

Then, in 1992, Zimbabwe suffered one of the worst droughts on record, a relatively short time after the devastating one of 1983 that LEMCO was still trying to recover from. The frequency and severity of the droughts effectively reduced confidence in the economic viability of cattle ranching in the area, and the Buby Valley Conservancy was subsequently founded in 1994 with the realisation that endemic wildlife, which are better adapted than livestock to cope with the local climate, could be successfully commercialised (Child 1988; Bond 1993).

The conversion from cattle ranching back to a wildlife area was neither straightforward

nor cheap, requiring a significant initial investment and annual running costs. In just 20 years of operation the Buby Valley Conservancy now protects the world's third largest black rhinoceros population, one of Zimbabwe's largest lion populations, a large and increasing elephant population, and abundant game.

Sport-hunting is an essential step in converting areas that were previously dedicated to livestock farming into non-consumptive tourism areas (Child 1993), and was fundamental to the formation of Buby Valley Conservancy and allowing the wildlife populations to recover. The Samanyanga area of the Buby Valley Conservancy, probably the most scenic section, was originally set aside for non-consumptive photographic tourism, but made an annual loss for several years, before, largely due to Zimbabwe's land reform program and resultant instability in the country, it was reverted back to sport-hunting as the only practical and economically viable option (K. Leatham, pers. comm.). Sustainable sport-hunting provides the sole economic incentive to continue operating the Buby Valley Conservancy as a wildlife conservation area.

Buby Valley Conservancy Community Support

The Buby Valley Conservancy donates over 45 tonnes of meat from sport-hunting to the local communities each year. This meat donation is worth over US\$ 100,000 per year, and the communities are free to decide how they use it. In addition to this, the Conservancy also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda and Jopempe. The local community thus

sees a direct benefit from the wildlife on the Bulye Valley Conservancy, but is also empowered by job opportunities created both with these special projects, as well as on the Conservancy. A summary of the Bulye Valley Conservancy community support effort between 2011 and 2015 is provided in Table 4.

Bulye Valley Conservancy Lion Monitoring and Management

After originally being eradicated by cattle ranchers in the area, 13 lions were reintroduced to the Bulye Valley Conservancy in 1999, and four young males broke into the Conservancy that same year. From the original 17 animals present in 1999, the Bulye Valley Conservancy lion population was estimated at approximately 280 individuals in 2009 when robust population surveys were initiated by a research team from the University of Oxford Wildlife Conservation Research Unit (WildCRU), and this population has continued to grow. Today it is estimated that there are over 500 lions on the Bulye Valley Conservancy (du Preez et al. 2015). The exponentially increasing Bulye Valley Conservancy lion population currently exists at one of the highest

densities in Africa (~ 0.187 lions km^{-2} : du Preez et al. 2015; Figure 7), greater than that of the Serengeti, Tanzania (0.100 lions km^{-2} : Pusey and Packer 1987; Spong 2002), Selous, Tanzania (0.080 - 0.130 lions km^{-2} : Creel and Creel 1996, 1997), Kruger National Park, South Africa (0.096 - 0.112 lions km^{-2} : Mills 1995), and Hwange National Park, Zimbabwe (0.027 lions km^{-2} : Loveridge et al. 2007). This equates to one of the largest contiguous lion populations in Zimbabwe.

Bulye Valley Conservancy Lion Hunting

The Bulye Valley Conservancy offsets the cost of lion predation on its wildlife via sport-hunting of the species, and which began in 2002. In 2014, the lion hunting quota allocated to the Bulye Valley Conservancy by ZPWMA was 10 individuals. Based on the fact that the entire quota was harvested and that maximum points were scored for each individual trophy (more than six years in age), the allocated quota was raised to 13 lions for 2015. Only 12 out of 13 lions were hunted in 2015 due to a late cancellation; nevertheless eight lions over six years old and four lions of five years old were harvested and the resultant points justifying a quota of 15 lions for 2016.

Table 3: *The Bulye Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	1	2	3	2	2	2	3	3	5	8	12	10	10	13
Quota taken	1	2	3	2	2	2	2	3	5	8	12	10	10	12
Percentage success	100	100	100	100	100	100	67	100	100	100	100	100	100	92

Note that while the lion hunting quota for Zimbabwe has been voluntarily reduced by the national steering committee, the Bubyee Valley Conservancy lion hunting quota has been successively raised twice

based on both hunt success and age of lions hunted and the resultant points scored under the national adaptive quota management system (Table 3).

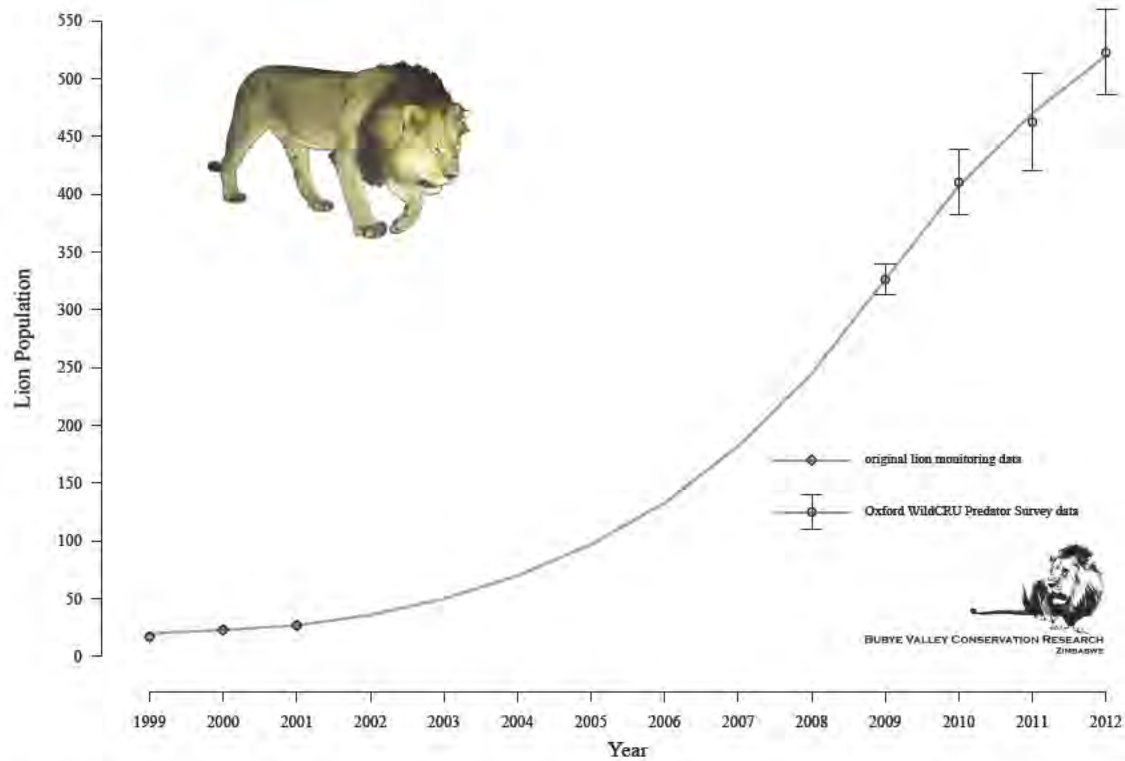


Figure 7: The Bubyee Valley Conservancy lion population has grown exponentially since the reintroduction of lions in 1999. Diamonds represent the known lion abundance from monitoring of the original individuals introduced; Points indicate lion abundance calculated from spoor transect analyses; error bars represent the standard error of the mean.

Table 4: *Summary of the Buby Valley Conservancy support to the surrounding local communities (2011 - 2015)*

Boreholes:	<ul style="list-style-type: none"> - 1 x Jompembi Village 2 - 1 x Penemene - 1 x Jompembi Village 4 - 1 x Nyimani village (Mwenezi) - 1 x Driehoek School - 1 x Mgaladivha School - 2 x Mtetengwe to supply water to the clinic site - 2 new bush pumps (complete) purchased and installed at Village 2 & Village 3 and troughs built at both sites <i>Drinking trough for cattle built at Village 2 borehole</i> <i>All boreholes equipped with new bushpumps, piping and cylinders</i> <i>Boreholes at Village 3, Mtetengwe, Mdzwiti, Vumani and Penemene and Makado Police post repaired and maintained</i> <i>All new piping and pumps etc. are supplied by BVC</i>
Buildings:	<ul style="list-style-type: none"> - Mtetengwe Clinic's main building built - 3 x F13 staff houses built <i>Clinic and House fenced - everything funded and built by BVC</i> <i>The clinic is a standard large Government clinic - male & female wards + maternity ward and outpatients</i> <i>Storerooms, offices etc. also built</i> <i>All houses and buildings are electrified, painted and supplied with running water</i> - Mtetengwe School school office block and staff room built and painted <i>All classroom windows repaired and the schools second borehole repaired.</i> - Secure engine house was built at the second borehole site - Borehole equipped with BH15S mono pump unit driven by a rebuilt Lister LT 1 engine - 5000 litre header tank and stand erected - new 5000 litre header tank purchased and fitted - pipeline laid to connect the borehole to the clinic - another pipeline connected to the same borehole to supply the Mtetengwe school with fresh water - New coldroom and refrigeration unit purchased and fitted at the Lutumba butchery <i>Part of aid program to get the Beit Bridge RDC self funding projects up and running</i> - New coldroom and refrigeration unit was purchased and fitted at the Rutenga butchery <i>Part of aid program to get the Mwenezi RDC self funding projects up and running</i>
Meat Donations:	<ul style="list-style-type: none"> - BVC donates meat on a regularly basis to the Mwenezi Orphanage - Numerous donations of meat were made to support school sports days & speech nights/prize giving events <i>Both Beit Bridge & Mwenezi districts</i> - 1600 kgs of meat has been donated each month since July 2011 to a Maranda trust <i>Administered by Chiefs and local headmen</i> <i>Excess meat sold and funds used for community projects</i> <i>Classroom roof replaced at Vhongwe school</i> <i>4 new classroom blocks constructed at other schools using funds from these monthly allocations</i> - 1000 kgs of meat per month is been donated to Beit Bridge communities since April 2014 - 1000 kgs of meat per month is been donated to Mwenezi communities since August 2013
Miscellaneous:	<ul style="list-style-type: none"> - Sports uniforms for the Penemene school team purchased (\$2600) <i>Sports uniforms required for inter-schools sports</i> - Transport the soccer teams representing Mgaladivha, Jompembi and Tongwe <i>To Lutumba for the inter-school competitions</i> - 2 sets of soccer goal posts & 2 sets of Netball poles were made for Mgaladivha School <i>New soccer field graded by BVC</i> - 2m security fencing supplied to Penemene School - Second hand door and window frames donated to Mapiri school (ex Mazunga School) - 1 new 3 1/2 " rod pump cylinder was purchased and fitted to the Vumhani borehole <i>All repairs to b/holes in the Vumhani area are done by BVC</i> - 26 bags of cement were donated to Mgaladivha School - Fencing donated to the Mgaladivha School - Supplied 10 x 5/8" mono shafts for the Botalele Clinic (Maranda) borehole - Water supply to Mlelezi Clinic - 400 m pipeline laid to supply the Nyimani Villarge's cattle with water <i>3.5 m drinking trough build for this same project</i> - 60 bags cement donated to the Welkom for repairs to a dam wall - 6 loads of riversand and 20 cement donated to Vumani Preschool - Various school renovations in both the Beit Bridge and Maranda areas
Current Projects:	<ul style="list-style-type: none"> - Construction of a School admin block at Mgaladivha School - Supply of 24 loads of riversand to Mdzwiti School (value \$1200) - All roofing materials supplied to Mdzwiti School - Supply roofing materials, cement, all window and door frames for Vumani Preschool

THE SAVÉ VALLEY CONSERVANCY

History of the Savé Valley Conservancy

The Savé Valley was a wildlife-rich wilderness until the early 1900's, when the first cattle ranching initiatives started in the area. The establishment of Devuli Ranch and Angus Ranch in 1920 paved the way for seven decades of commercial cattle ranching in the area we know today as the Savé Valley Conservancy. Roads were cut, fences erected and an everlasting 'battle' ensued against the wildlife, especially against all predators.

The large predators, especially lions, were virtually eradicated (Pole 1999). However, by the late 1980's, declining range productivity, depressions and droughts forced the landowners to consider alternative options. Around that time, empirical evidence of the competitive advantage of wildlife over livestock began to emerge (Child 1988; Bond 1993), especially in arid areas (Jansen et al 1992; Cumming 1993), and wildlife was finally given serious consideration as a viable land use option.

In 1989, a proposal was drawn up (du Toit 1989) to turn what was then the Sabi Valley Intensive Conservation Area into a wildlife conservancy. The plan was to create a single large wildlife area, especially for the re-establishment of endangered species and overexploited species, with cattle remaining the primary income generator. The Savé Valley Conservancy was constitutionally inaugurated in June 1991, and following the severe 1991/1992 drought, wildlife ranching became the primary land-use. At the time this was the largest private wildlife conser-

vancy in the world (3,410 km²).

The conservancy members then restocked the wildlife, removed all internal fencing, erected a common perimeter fence and developed effective security systems. A double, electrified, veterinary-approved fence was completed in 1995, and the following decade saw a massive investment in wildlife re-stocking and security systems.

Sport-hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, re-stock game, and improve security, especially because of the significant numbers of black rhinoceros now found there. Gradually, some of the ranchers shifted more into ecotourism. One property, Senuko Ranch, completed a 16 bed up-market lodge with a view of marketing non-consumptive safaris, offering game drives and bush walks and specializing in rhino walks and African wild dog *Lycaon pictus* den visits. Lodge occupancy rose from 0% in 1996 to 62% by the end of 1999.

However, the Zimbabwean land reform program, which was initiated in February 2000, soon made a strong negative impression in the international community, and resulted in travel bans and warning from most of Zimbabwe's source markets. This, together with the political instability meant that the wildlife industry and ecotourism industry collapsed over-night: sport-hunting became the only economically viable land use option, and has remained the only tangible source of income to the landowners of the Savé Valley Conservancy. In the case of the Senuko Lodge, for example, the land reform program resulted in a 98% cancellation of

the confirmed bookings. After four years of seeking alternative markets, the lodge could achieve no higher than 17% occupancy, and in 2005 moved back into a hunting-based operation.

A more direct impact of the land reform program for the Savé Valley Conservancy was the loss of 33% of the area of the conservancy to invading subsistence farmers (Lindsey et al 2008). The loss of land was catastrophic and the related pressure from wire snare poaching was extreme. In the following eight years (2001 to 2009), 10,520 illegal hunting incidences were recorded, 84,396 wire snares were removed and at least 6,454 wild animals killed (Lindsey et al. 2011).

Savé Valley Conservancy Community Support and Anti-Poaching

In 2012, conservancy members provided over US\$ 100,000 worth of support to adjacent villages or farmers in the resettled areas. Assistance included drilling boreholes, maintaining boreholes, dredging of dams, assisting with building projects in clinics and schools, assisting with repairs, maintenance and materials at schools, education initiatives, school field trips, provision of computer equipment in schools, craft programs and regular donations of meat.

Moreover, the conservancy recently entered into a mutually dependent agreement with the Chiefs representing the communities surrounding the Savé Valley Conservancy. The agreement links the communities to the Natural Resource Utilisation that occurs through the business operation of the conservancy and opens up opportunities for the local indigenous populations to share in any wealth creation. This agree-

ment strengthens relations between the conservancy and the surrounding local communities and creates an environment that helps to protect, conserve and sustain the natural assets of the area. The hunting tourism of the conservancy is currently the only form of income by which the surrounding communities can benefit. Revenues from trophy lion hunting constitute a significant portion of inflow and thus an important part of the community benefits. Any reduction would seriously jeopardise the growth of this infant positive relationship and community empowerment initiative.

The Savé Valley Conservancy is thus pioneering private-community partnerships in Zimbabwe, and trade restrictions on lion trophies will indirectly adversely affect these already seriously impoverished communities through a reduction in available income to share with communities. This is very likely to have a knock on impact on the lions themselves with a significantly reduced tolerance and an increase in retaliatory poisoning of lions for livestock predation. Without a demonstration of income from lions, the political pressure from the surrounding communities to remove them from the conservancy altogether will be a challenge to resist.

Savé Valley Conservancy Lion Monitoring and Management

After the Conservancy was formed, and persecution stopped, lions, mainly males, recolonized the area and their numbers started to increase in the late 1990's / early 2000's. Few lionesses were observed until 2003, when small family groups and male-female pairs were seen, and by 2004 - 2005 there were some reports of cubs. During this period 13

lions were also reintroduced into the Savé Valley Conservancy. After an initial lag phase the lion population on the Savé Valley Conservancy has increased dramatically and at present is growing exponentially (Figure 8; Groom and Watermeyer 2015).

Monitoring of the lion population began in 1999 (Pole 1999) with track index or call-up surveys being conducted sporadically until 2006. From 2007 to present, annual conservancy-wide track index surveys have been conducted using a standardized methodology (Groom and Watermeyer 2015). The resulting population estimates were verified in 2011 by a baited lion call-up survey and a collation of managers' estimates, all of which provided similar results.

Prey availability models (Hayward et al. 2007) suggest that the carrying capacity for the lion population in the Savé Valley Conservancy is approximately 271 lions. The population estimate for 2015 was 284 lions, suggesting lions have reached their ecological carrying capacity, even whilst being responsibly hunted.

A professional lion management plan was commissioned by the conservancy in 2011 (Funston 2011), to provide the Savé Valley Conservancy members with a science-based

plan to help them ethically and sustainably manage their lion population. This plan specifically advocates the use of hunting as a conservation management tool. It also demonstrates willingness by the conservancy to guide their lion management based on science and advice from professionals.

Savé Valley Conservancy Lion Hunting

Lions have been hunted in the Savé Valley Conservancy since 2002, although that was largely for removal of problem animals. Hunting began properly in 2005 with quotas increasing annually to a maximum of seven per year from 2009 onwards (Table 5), with the quota being raised to ten for 2016 based on trophy ages.

Despite offtakes of lions through sport-hunting, the lion population has continued to increase in the Conservancy. The revenue generated from hunting lions has enabled landowners to invest in proper land management, anti-poaching, water provision and fence maintenance, all of which benefit the lion population (especially as lions seem to be vulnerable to being caught in wire snares; Becker et al 2013; R. Groom, pers. obs.).

Table 5: *The Savé Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	5	5	1	3	3	4	6	7	7	7	4	2	3	5
Quota taken	1	0	1	3	3	3	3	6	5	3	4	1	3	5
Percentage success	20	0	100	100	100	75	50	86	71	43	100	50	100	100

Sport-hunting of lions brings considerable revenue to the Conservancy, revenue that is vital for the continued functioning of the area for wildlife conservation. Without the costs of lions being offset by the income

from sport-hunting, landowners cannot reasonably be expected to tolerate such high lion densities, and their numbers would have to be reduced significantly.

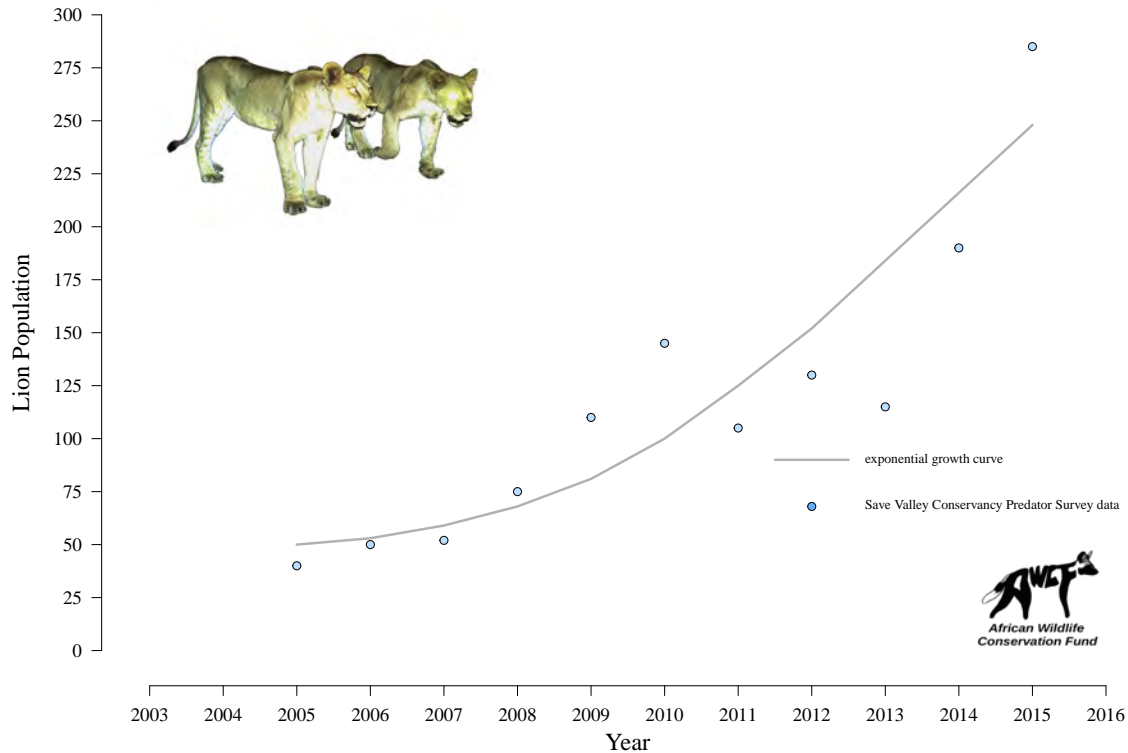


Figure 8: The Savé Valley Conservancy lion population, like that of the Buby Valley Conservancy, has grown exponentially. Points indicate estimated lion abundance calculated from field surveys; the line represents the exponential growth curve.

THE PROS AND CONS OF CONSERVING LIONS

The saturation of lions in wildlife areas on both state and private land is positive for their future conservation security; but it is also critical to that of incidentally conserved endangered species, such as both species of rhinoceros on private wildlife conservancies in Zimbabwe (Lindsey et al. 2009; Suzuki 2001), which benefit from the same resources and protection that are incentivised and provided by the revenue generated from sport-hunting. The Bulye Valley Conservancy now boasts the world's third largest black rhinoceros population (N. Anderson [Lowveld Rhino Trust], pers. comm.), which is classified as Key 1 by the African Rhino Specialist Group and means that this population is considered key to the overall survival of the species. The Savé Valley Conservancy has the second largest black rhinoceros population in Zimbabwe after Bulye. These are not coincidences. These rhinoceros (and other endangered species, such as wild dog) strongholds are the result of the incidental conservation benefits derived entirely from sport-hunting activities - there are no photographic tourists visiting either the Bulye Valley or Savé Valley Conservancies, and the rhinoceros are not hunted. Having rhinoceros on the land therefore generates no revenue - and in fact there is a significant cost associated with protecting these animals; US\$ 590,000 (not including incentive and reward bonuses donated for these purposes) was spent on anti-poaching by the Bulye Valley Conservancy during 2015 (K. Leathem, pers. comm.), and US\$ 546,000 is spent annually on anti-poaching by the Savé Valley Conservancy (Lindsey et al. 2012). This expense is covered mainly

by the revenue generated by sport-hunting with additional donations from the clients; and most importantly, the habitat for the rhinoceros is preserved by maintaining the land as a conservation area, as opposed to converting it into agricultural or grazing land for example.

However, the high densities of lion populations achieved within commercial wildlife areas have the potential for intense intraguild persecution. Lions are aggressively competitive, and research on the relationship between lions and leopards has shown that high densities of lions can negatively affect leopard population density, demographic structure, cub survival, and spatial ecology down to even the step-wise decisions that leopards make regarding habitat use and behaviour based on both the actual and potential risk of encountering lions (du Preez 2014; du Preez 2015). Leopards are a generalist species that are able to cope with persecution by adapting their behaviour and ecological niche, and even they suffer under a burgeoning lion population; ecological specialists and endangered species, such as cheetah *Acinonyx jubatus* and wild dog, do not fare nearly as well under such intense competitive pressure. In fact, competition with lions has been directly linked to reductions in cheetah (e.g. Durant 1998, 2000; Laurenson 1995) and wild dog (e.g. Creel 2001; Creel and Creel 1996; Vucetich and Creel 1999) densities, both of which face local extinction where lion abundance, and the respective level of persecution, is high. Excessive lion densities may also result in population declines of ungulate prey (e.g. Wegge et al. 2009). It is vital to holistic conservation that wildlife managers can understand and deal with the level of impact that lions exert on other species; particularly those that

are elusive difficult to observe, and which face decline if not carefully monitored. To this end, a conservation research initiative in partnership with WildCRU was established on the Buby Valley Conservancy in 2009, and research conducted on the Savé Valley Conservancy since 2007.

Based on the number of kills made (du Preez et al. in prep.) and the current value of the meat (K. Leathem, pers. comm.),

the Buby Valley Conservancy lion population consumes hundreds of thousands of dollars worth of prey each year. These lions are mainly tolerated because of their ability to generate the revenue that helps to offset this expense - although it is estimated that economically it is still not worth keeping the lions whose cost outweighs their value (Funston et al. 2013).

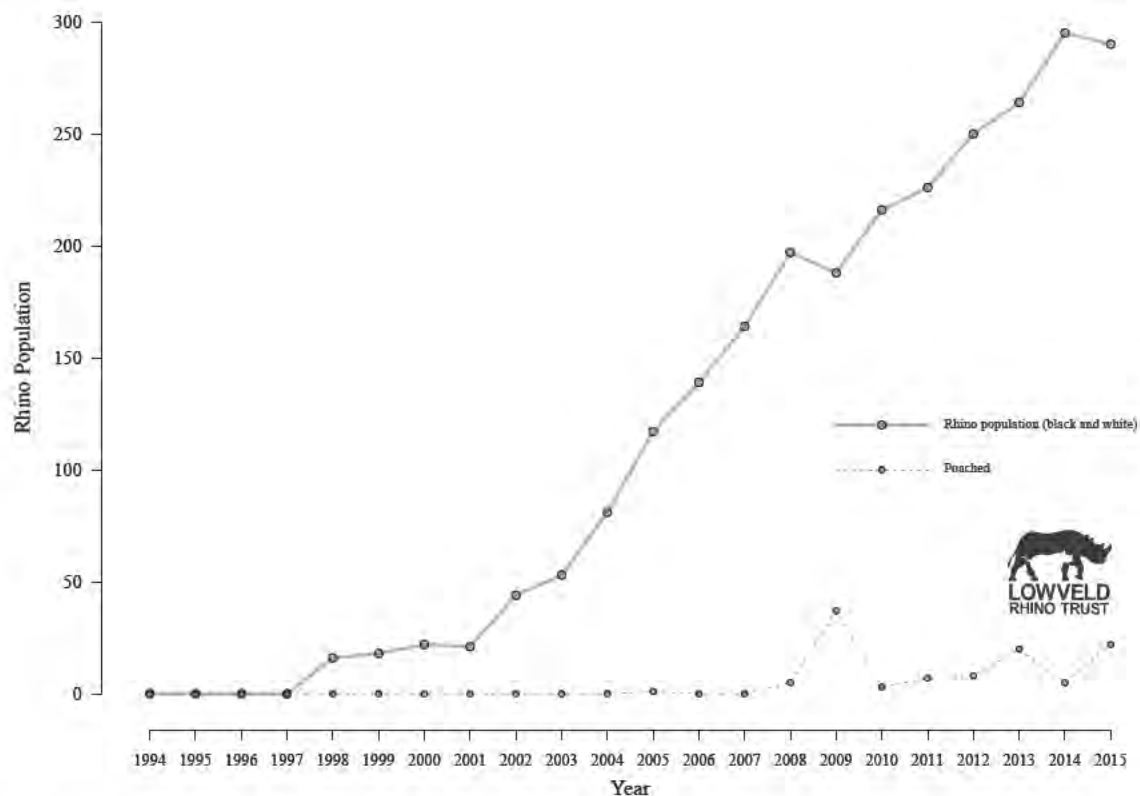


Figure 9: The Buby Valley Conservancy black rhino population is rated as Key 1 by the African Rhino Specialist Group which means that the population is considered key to the overall survival of the species.

WHERE THE MONEY GOES: THE FINANCES OF LION SPORT-HUNTING AND REINVESTMENT IN THEIR CONSERVATION

Break-down of the finances involved in a typical lion hunt on the Buby Valley Conservancy:

Lion Trophy fee: US\$ 42,000

Lion Hunt Daily rate: US\$ 2,950 day⁻¹

(Minimum lion hunt duration: 18 days [*total daily rate of US\$ 53,100 lion hunt⁻¹*])

Additional costs include:

ZPWMA scout

Observers

Bait used

Other trophy species taken during the lion hunt, etc.

[*These additional costs average approximately US\$ 6,500 lion hunt⁻¹*]

BUBY VALLEY CONSERVANCY - LION SPORT-HUNTING REVENUE GENERATED (2015):

$$\begin{aligned} & ((18 \text{ days} \times 2,950 \text{ day}^{-1}) + 42,000 \text{ trophy fee} + 6,500 \text{ additional costs}) \times 12 \text{ lions} \\ & = \text{US\$ } 1,219,200 \end{aligned}$$

Lion sport-hunting therefore represents approximately 33.9% of the Buby Valley Conservancy's total annual revenue generation (which includes post-hunt meat and hide sales).

All of the revenue generated from lion sport-hunting on the Buby Valley Conservancy has gone back into the running costs of the Conservancy, which is all part of conservation, and which includes: anti-poaching and fence monitoring and maintenance (approximately US\$ 506,000 year⁻¹), research (approximately US\$ 34,700 year⁻¹ not including client and sponsor donations), and community support assistance (approximately US\$ 210,000 year⁻¹).

[*No profit after costs has been declared, nor dividends taken by shareholders, since the Buby Valley Conservancy was formed in 1994. All revenue generated to date has been spent on running costs, improvements and restocking.*]

DISCUSSION

Here we have shown that since their reintroduction after historical eradication, both the Buby Valley and Savé Valley Conservancies' lion populations have increased exponentially - not despite sport-hunting, but because of sport-hunting and the incentive it provides for protection.

The success of the Buby Valley and Savé Valley Conservancies, in terms of both of their hunted lion and non-hunted rhinoceros populations, may also provide the motivation for other areas in the country to sustainably manage their wildlife resource. A case in point is the Nuanetsi Ranch, a wildlife area that is also a legacy of failed cattle ranching, located almost directly between the Buby Valley and Savé Valley Conservancies in Zimbabwe (Figure 3). At present there is a single lion on the Nuanetsi Ranch but management is not able to justify introducing more due to the current uncertainty over the future of lion hunting (B. Lees-May [Nuanetsi Ranch Conservator], pers. comm.). The Nuanetsi Ranch is a wildlife area of 1,489 km², and could conceivably sustainably hold between 201 and 278 lions (based on the most recently estimated lion densities of the Savé Valley [0.135 lions km⁻²; Groom and Watermeyer 2015]; and Buby Valley [0.187 lions km⁻²; du Preez et al. 2015] Conservancies respectively). However, the Nuanetsi Ranch has invested in building up an abundant wildlife population, which is sport-hunted, and the management will not risk losing a significant amount of valuable game, that could otherwise be sold as trophies or meat, to a species from which it can not recuperate lost revenue, and instead that requires further investment in control measures (B. Lees-May [Nuanetsi

Ranch Conservator], pers. comm.).

Between 2005 and 2015 the United States market has represented 70.4% of the total Zimbabwean lion sport-hunting industry (http://trade.cites.org/en/cites_trade/ [accessed 2015-01-19]), though in reality it constituted over 90% for both the Buby Valley and Savé Valley Conservancies. If this market was effectively lost due an inability of prospective clients to import their trophies, based on the economics involved it would become unviable to continue managing the Buby Valley Conservancy as a wildlife area in its current form, and lions would either have to be re-extirminated, or at least severely reduced via culling; or else what is the largest privately owned wildlife area in the world would be converted back into a cattle ranching area (K. Leatham, pers. comm.). This is the reality of any business, in that it needs to cover costs and pay staff and cannot run at a loss for luxury of conservation. Child (1993) states “*A refusal to treat wildlife in the same way as other resources and maintenance of centralised protectionist management prejudices its survival. Only by raising its commercial value will wildlife be able to compete for space on the scarce African landscape. Trade bans which detract from wildlife's commercial value prejudice its chances of survival in the long term*”.

Although the USFWS understandably categorises lion conservation by country for simplicity, rather than individual properties, the Buby Valley and Savé Valley Conservancies currently and deservedly hunt more than a third of the total Zimbabwean lion quota between them. Here we have shown that this sport-hunting does not negatively affect the lion population, which remains in positive growth despite off-take. In addition

to this, other areas, such as the Nuanetsi Ranch, could be incentivised to invest in lion conservation if the ability to sustainably utilise the lions as a resource was guaranteed.

The USFWS identified five primary factors that threaten lion survival in the wild, namely: habitat loss; loss of prey; retaliatory killing due to increased human-lion conflicts; inadequate regulatory mechanisms; and weak management of protected areas (<http://www.fws.gov/endangered/what-we-do/lion.html> [accessed 2015-01-19]). Each and every point on this list, which notably does not include sport-hunting, supports the fact that incentivising tolerance for lions through sustainable use would enhance the species' overall survival.

As responsible conservationists, we are not arguing against tight regulation of sport-hunting, especially with regard to sensitive species such as lions, and we support the need for transparency and accountability within the industry. However, this reform is a process being driven from within, as any indiscretion is an affront on all stakeholders. For example, long-term lion monitoring by WildCRU in Hwange National Park (HNP), Matabeleland North, Zimbabwe, documented a 'vacuum effect' and reduction in male lion density in the Park as a result of sport-hunting in the surrounding areas (Loveridge et al. 2007). A result of this research was the recommendation that ZPWMA implement a hunting moratorium in western Zimbabwe, which was accepted and enforced from 2005 to 2008 (Davidson 2009). Subsequent monitoring of the HNP lion population showed that the perturbation effects caused by sport-hunting were

reversed during the moratorium, and sport-hunting was reinstated at a reduced, more sustainable quota (Davidson 2009). This example demonstrates both the relationship between independent researchers and ZPWMA, and that the research assists ZPWMA in robust decision making. This study has also shown that the lion population was able to recover quickly, and that a blanket-ban would have been as unnecessary as it would have been detrimental to overall lion conservation in the country.

In addition to the self-imposed hunting moratorium in the Matabeleland North district, Zimbabwe has voluntarily stopped sport-hunting of any lioness. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season even began, and which was resultantly attributed to poor quality trophies and young animals being hunted, has also been abandoned. The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have minimal ecological impact, being old individuals that are no longer contributing to the gene pool nor protecting cubs.

The IUCN Red List lion conservation status has remained unchanged for 20 years even in the face of Africa's ever-changing landscape. Despite fears that lion abundance is decreasing overall, in southern Africa it is in fact increasing (Bauer et al. 2015b).

CONCLUSION

Given the evidence presented, the arguments against sport-hunting would appear to be based more in emotion than logic and reality (e.g. Lindsey et al. 2015). Conservation, however, is not about individuals within populations, but the overall populations themselves. Sustainable sport-hunting of lions is just that: *sustainable* - and ironically, without it, the lions themselves become unsustainable. Conservation objectives need to be balanced with both social and economic factors if they are to be achieved.

The USFWS states “Well-managed conservation programs use trophy hunting revenues to sustain lion conservation, research and anti-poaching activities” (<http://www.fws.gov/endangered/what-we-do/lion.html> [accessed 2015-01-19]). The Bulye Valley and Savé Valley Conservan-

cies both fully meet each one of these conditions: clearly contributing to lion conservation in Zimbabwe; having long-term conservation research programs; and self-funded anti-poaching units.

The histories regarding the formation of both the Bulye Valley and Savé Valley Conservancies were both presented in this report, despite being remarkably similar; the point being that lion conservation in both areas, and many others, has the same fate either way. The Bulye Valley and Savé Valley Conservancies are both excellent examples of focussed and determined efforts to make wildlife based land use viable in an otherwise cattle dominated landscape. However, the fact remains that the cost of having lions, both ecologically and financially, is high. Simply increasing the abundance of one species at the expense of another cannot be considered a conservation success.

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Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

RCVD FEB 16 2016

LB

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Threatened-listed
lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name Zulim	1.b. First name Thomas	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions) NA
6.a. Telephone number (b) (6)	6.b. Alternate telephone number NA	6.c. Fax number NA	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 NA	
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information					
1.a. Physical address (Street address; Apartment #, Suite #, or Room #, no P.O. Boxes) (b) (6)					
1.b. City Hockley	1.c. State TX	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province (b) (6)	1.f. Country USA	
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) (b) (6)					
2.b. City Hockley	2.c. State TX	2.d. Zip code/Postal code: (b) (6)	2.e. County/Province (b) (6)	2.f. Country USA	

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 15US59483B/9 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. [Signature] Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) 02/12/2016 Date of signature (mm/dd/yyyy)	

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

P. i. melanochaita (African lion)

b. Sex (if known).

Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

Please see accompanying Attachment A

b. Date wildlife is to be hunted:

June 1 - 21, 2016

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

All parts including skin, skull, teeth and claws

3. **IF THE ANIMAL IS DEAD**, please enter the following:

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

NA —

b. Date wildlife was hunted:

NA —

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

NA —

- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

NA —

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Please see accompanying Attachment A

Name:

Business Name: Thathahamba Enterprises T/A Mpondo Safaris

Address: 7B Birkenhead Road

Address:

City: Belmont

State/Province: Bulawayo

Country, Postal Code: Zimbabwe, 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.

Please see information provided by: Conservation Force, Pete Fick/Bubye Valley Conservancy, and the Zimbabwe authorities

6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  _____ Date: 02/12/2016

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/lc/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

I will use a designated port.

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

Same as indicated on page 1.

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Tom Zulim

(b) (6)

AND

John J. Jackson or Regina Lennox of Conservation Force

504-837-1233

jjw-no2@att.net or regina.lennox@conservationforce.org

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

Attachment A - Items 2.a. and 4
FWS Permit Application Form
Zulim, Thomas Michael

Country: ZIMBABWE, AFRICA

Operators Name: Thathahamba Enterprises T/A Mpondo Safaris

Address: 7B BIRKENHEAD ROAD, BELMONT, BULAWAYO, ZIMBABWE, AFRICA

Zimbabwe Tourism Operators Hop Number: 0309

Area of Hunt / Place: RIVERSIDE RANCH, Zimbabwe, Africa

Land Owners Name: W.D. R Bedford

GPS coordinates:

(This what we have to use in Zimbabwe)

Position Format UTM/UPS

Map Datum WGS 84

35 K 0426199

UTM 7966815

Closest Town: Hwange Town, Zimbabwe, Africa

Area: Matetsi Block, Zimbabwe, Africa

Region/Province: Matabeleland North Province, Zimbabwe, Africa

Professional Hunter Guiding Safari: George Hallamore

License Number: 144 Issued by National Parks and Wildlife of Zimbabwe, Africa

Dates of Safari: 1st to 21st of June 2016

GPS Coordinates for area:

Latitude: 18° 23' 15" S

Longitude: 26° 18' 4" E

(b) (6)

12 February, 2016 Date

Pay to the Order of U.S. Fish & Wildlife Service \$ 100.00 Dollars

PROSPERITY BANK
WALLER BANKING CENTER
31250 FM 2920 • WALLER, TX 77484
936-372-9404 www.prosperitybankusa.com

For FWS Application Fee

(b) (6)

(b) (6)

(b) (6)

MP

RCVD FEB 16 2016



Nelson, Emma <emma_nelson@fws.gov>

Permit No. 88388B Fwd: Feb 16 2016 1:30:00; Acknowledgement letter for Permit No. "88388B"

1 message

Tom Zulim (b) (6)
To: emma_nelson@fws.gov

Tue, Feb 16, 2016 at 3:38 PM

Please find attached some additional information I would like to submit to be included with the above referenced permit application. It is provided by the Zimbabwe safari operator who is noted in the permit application. Please confirm receipt and let me know if you have any questions. Thank you.

Tom Zulim

Sent from my iPhone

Begin forwarded message:

From: E-Mail Sys#5 <permits@fws.gov>
Date: February 16, 2016 at 12:30:02 PM CST
To: (b) (6)
Cc: <permits@fws.gov>
Subject: Feb 16 2016 1:30:00; Acknowledgement letter for Permit No. "88388B"
Reply-To: <permits@fws.gov>

THOMAS (b) (6) ZULIM
(b) (6)
HOCKLEY, TX (b) (6)
U.S.A.

Thank you for submitting an application to the U.S. Fish and Wildlife Service. The application was received by the Division of Management Authority on 02/16/2016; check number (b) (6) accompanied the application. Your application has been assigned the following PRT identification number: MA88388B-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.

384



To Whom it May Concern.pdf
471K

THATHAHAMBA ENTERPRISES (PRIVATE) LIMITED

t/a MPONDO SAFARIS

7B BIRKENHEAD ROAD
BELMONT, BULAWAYO
ZIMBABAWE

Email: pgreeffimpondo@gmail.com

Cell: 0772 104 008

16 February 2016

To Whom It May Concern

Mpondo Safari's operates on land acres adjoining Matetsi Safari area unit 4 and Deka Safari area. The Deka River cuts through the property which we spent a lot of money on damming to provide year round water for the game. We bought a herd of Buffalo for a breeding programme. The property also has 5 pans which we pump to all year round from the dam. This keeps the game spread out as not to pressurise the grazing around the dam. We have also drilled 3 boreholes on the property which we supply water from.

There are 15 workers employed on the property which are employed from the local community thereby supporting their families. Which, total over 60 people, 8 of these workers are on fulltime anti-poaching duty as we are under pressure from poachers, constantly removing snare lines. The cost of all the above is immense and would not be able to be funded without hunting. Due to the dry arid region we also supplementary feed the game during the winter months the food is trucked in from 360km away.

Kind Regards,



P. Greeff



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 06 2016

LB

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES Threatened-listed
(Appendix I of CITES and/or **ESA**) lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name RUDOLPH	1.b. First name LAURENCE	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number (b) (6)	6.b. Alternate telephone number (b) (6)	6.c. Fax number (b) (6)	6.d. E-mail address (b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (dba)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information					
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)					
1.b. City PARADISE VALLEY	1.c. State AZ	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province NA	1.f. Country USA	
2.a. Mailing Address (include if different than physical address; include name and title) NA					
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country	

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 1605793798/9 No <input type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. [Signature] Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)
	03/29/2016 Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handcrafted items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting, please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
P. l. melanochaita (African lion)
 - h. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
ZAMBIA, MUMBWA WEST GMA
 - b. Date wildlife is to be hunted: May 24TH 2016 → June 20TH 2016
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
All parts including skin, skull, teeth, and claws
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
N/A
 - b. Date wildlife was hunted: N/A

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

N/A

- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

N/A

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:

Business Name: **MANGOMBA SAFARIS LTD.**

Address: **133 FREEDOM WAY**

Address:

City: **LUSAKA**

State/Province:

Country, Postal Code: **ZAMBIA**

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information provided by Conservation Force, Zambian authorities, and Zambian operators.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

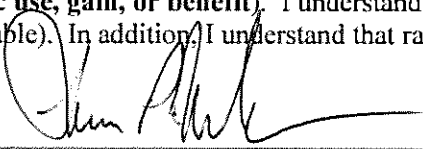
6. ~~If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.~~

~~I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.~~

~~Taxidermist/Broker's signature: _____ Date: _____~~

7. **If you are the hunter applying to import your own trophy, please read and sign the following statement.**

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  Date: **3/29/16**

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/lc/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

John J. Jackson, III or Regina Lennox of Conservation Force
504-837-1233, jjw-no2@att.net or regina.lennox@conservationforce.org

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

NOTICE OF REPRESENTATION

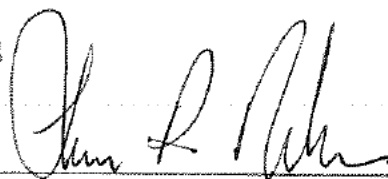
This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed African lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion trophy at the following address:

John J. Jackson, III
Regina Lennox
Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: jjw-no2@att.net
E: regina.lennox@conservationforce.org

Signed: _____



Name: _____

Lawrence P. Rudolph

(b) (6)

Date: _____

3/29/16

4/2/16

RCVD APR 06 2016

LB

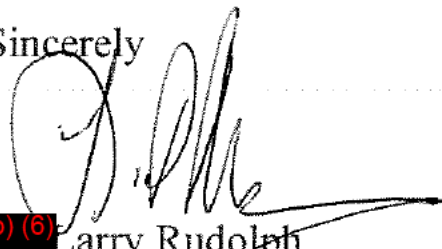
U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits,MS:IA
5275 Lessburg Pike
Falls Church, VA 22041-3803

Dear Sirs;

Enclosed please find my application for the import of sport hunted trophy. I have attached the application fee of \$100 and also a return, pre-paid FedEx envelope to send the permit in when processed.

Thank you for your time and attention to this application.

Sincerely


(b) (6) Larry Rudolph

(b) (6) 3/29/16 due
 (b) (6)
 Pay to the U.S. Fish and Wildlife Service \$ 100.00
 Order of One hundred and 00/100 — Dollars
 (b) (6)
 (b) (6)
 For Application Fee F.W. Permit
 (b) (6)

U.S. Fish and Wildlife Service
 Department of the Interior
 Washington, D.C. 20240

RECEIVED
 APR 06 2016



Vannorman, Tim <tim_vannorman@fws.gov>

Supplement to PRT US93398B/9 -- lion enhancement information

1 message

Regina A. Lennox <regina.lennox@conservationforce.org>

Wed, Sep 7, 2016 at 7:05 PM

To: "Vannorman, Tim" <tim_vannorman@fws.gov>

Cc: "John J. Jackson, III" <cf@conservationforce.org>, darcy_vargas@fws.gov

Dear Tim,

We hope you are doing well. Below please find an email from one of our applicants, Mr. Lawrence Patrick Rudolph, PRT US93398B/9, with information regarding compliance with the new age-based regulation for lion hunting in Zambia. Mr. Rudolph attached a photo that reflects a mature (7+) lion.

Please consider this information in making an enhancement finding and issuing permits for import of lion trophies from Zambia.

Please let us know if you have any questions.

Best wishes,

Regina

----- Forwarded Message -----

Subject: Zambia import lion

Date: Sun, 4 Sep 2016 08:32:06 -0700

From: Larry Rudolph (b) (6)

To: jjw-no@att.net

JJ

Had a very successful hunt in Zambia.. The news out of Zambia seems positive in that the lions taken , about 10 so far, at least the photos I have seen represent mature males meeting the set standards.

Mine is at least 7 +

What if anything have you heard from your rep?

Anything positive on importation into the USA?

Thanks, best to Chrissie

Larry Rudolph

--

Regina A. Lennox
Conservation Force
3240 S I-10 Service Road W, Suite 200
Metairie, Louisiana 70001 USA
504-837-1233 (office)
919-452-8652 (cell)
regina.lennox@conservationforce.org

2 attachments



IMG_2105.JPG
1156K

 **Attached Message Part**
1K



Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

RCVD APR 14 2016

LB

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name <i>Taunton</i>	1.b. First name <i>Oscar</i>	1.c. Middle name or initial (b) (6)	1.d. Suffix (b) (6)
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number (b) (6)	6.b. Alternate telephone number (b) (6)	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 <i>N/A</i>		1.b. Doing business as (dba) <i>N/A</i>	
2. Tax identification no. <i>N/A</i>		3. Description of business, agency, Tribe, or institution <i>N/A</i>	
4.a. Principal officer Last name <i>N/A</i>	4.b. Principal officer First name <i>N/A</i>	4.c. Principal officer Middle name/ initial <i>N/A</i>	4.d. Suffix <i>N/A</i>
5. Principal officer title <i>N/A</i>		6. Primary contact name <i>N/A</i>	
7.a. Business telephone number <i>N/A</i>	7.b. Alternate telephone number <i>N/A</i>	7.c. Business fax number <i>N/A</i>	7.d. Business e-mail address <i>N/A</i>

C. All applicants complete address information					
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)					
1.b. City <i>Angie</i>	1.c. State <i>TX</i>	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province (b) (6)	1.f. Country <i>USA</i>	
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) <i>N/A</i>					
2.b. City <i>N/A</i>	2.c. State <i>N/A</i>	2.d. Zip code/Postal code: <i>N/A</i>	2.e. County/Province <i>N/A</i>	2.f. Country <i>N/A</i>	

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <i>Oscar P.T. 27</i> Signature () of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) <i>03/21/2016</i>

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least 90 days for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting, please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

AFRICAN LION (PANTHERA LEO)

b. Sex (if known).

MALE

2. IF ANIMAL IS CURRENTLY LIVING IN THE WILD, please enter the following:

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

ZIMBABWE - MANINGA CONSERVANCY, MASHOVALAND DIST.
16°33'32"S 30°5'5"E Mhangura

b. Date wildlife is to be hunted:

29 May 2016 → 20 June 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 mount skin - Skull - NB CLAWS ATTACHED

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 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: Andy Hunter
Business Name: Chipitani Safari Company
Address: 8 Revonia Drive
Address: Mount Pleasant
City: Harare
State/Province: Masvingo
Country, Postal Code: Zimbabwe - Africa

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: N/A Date: N/A

7. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: [Signature] Date: 03/26/2016

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 _____. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

SAME ADDRESS AS PAGE 1

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information: you will be contacted for this information. *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. *N/A*

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Robert Jacobson
(C) (b) (6)

(C)

(b) (6)

EMAIL:

(b) (6)

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.



DATE 20/MARCH/2016

ATT: USFWS

DEPARTMENT: IMPORTATION OF LION AND ELEPHANT

REFERENCE :CLIENT :

THIS LETTER SERVES TO EXPLAIN MY COMPANYS COMMITMENT TO CONSUMPTIVE UTILISATION IN THE MANINGA CONSERVANCY AND MSAIZE/MAPARI CONCESSIONS IN THE SAVE VALLEY CONSERVANCY.

DISCRIPTION AS FOLLOWS

MANINGA CONSERVANCY

MANINGA ENCOMPASSES A TOTAL OF 480,000 (FOUR HUNDRED & EIGHTY THOUSAND ACRES) AND WITH IN THE BORDERS OF THIS AREA THERE ARE NO INTERNAL HABITATIONS OF LOCAL COMMUNITIES AND IN ESSANCE AN UP AND COMING CONSERVANCY THAT IS UNIQUE AS THE LAND IS OWNED BY RIGHT INDIGENOUS ZIMBABWEANS WHICH IS THE ONLY CONSERVANCY IN ZIMBABWE LEGALLY OWNED BY TRUE AFRICANS.

WE HAVE A LONG TERM PARTNERSHIP ON AN EXCLUSIVE OPERATIONAL BASIS AND WE UNDERTAKE ALL HUNTING SAFARIS AND MAINTENANCE AS WELL AS ALL ANTI POACHING OPERATIONS IN THIS AREA.

WE EMPLOY A FULL TIME CONTINGENT OF 1 (ONE) ANTI POACHING MANAGER AND 30 (THIRTY) GAME SCOUTS THAT ONLY FOCUS ON CARIVING OUT ACTIVE ANTI POACHING PATROLS.

WE HAVE ONE LION AND 4 ELEPHANT BULLS ON QUOTA FOR THE 2016 HUNTING SEASON.

THE VALUE OF CONTRIBUTES TO A HUGE PART OF OUR RUNNING EXPENCES TO HELP WITH CRITICAL FINANCIAL BACKING TO LOOK AFTER OUR NATURAL RESOURCES AND CURB ILLEGAL POACHING RINGS.

JOHN A. TAUNTON
(b)(6)
ARGYLE, TX (b)(6)

3/21/16

(b)(6)

Pay to the order of U.S. Fish and Wildlife Service \$ 100.00
One Hundred and No/100 Dollars

USAA FEDERAL SAVINGS BANK
10750 MACDONALD Pkwy
SAN ANTONIO, TEXAS 78228-0244
(210) 485-6000 1-800-632-3724

For (b)(6)

(b)(6)

D. S. J. J.

RCVD APR 14 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: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

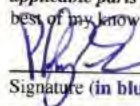
Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES Threatened-listed
(Appendix I of CITES and/or **ESA**) lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name Glass	1.b. First name Philip	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number (b) (6)	6.b. Alternate telephone number (b) (6)	6.c. Fax number (b) (6)	6.d. E-mail address (b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (dba)	
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information				
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)				
1.b. City Water Valley	1.c. State Texas	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province (b) (6)	1.f. Country USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) (b) (6)				
2.b. City Water Valley	2.c. State Texas	2.d. Zip code/Postal code: (b) (6)	2.e. County/Province (b) (6)	2.f. Country USA

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 2-12-16	

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (*Appendix I of CITES and/or ESA*)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
P. l. melanochaita (African lion)
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
 - b. Date wildlife is to be hunted:
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
All parts including skin, skull, teeth, and claws
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
N/A
 - b. Date wildlife was hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:

Business Name:

Address:

Address:

City:

State/Province:

Country, Postal Code:

TROPHY CONSULTANTS INTERNATIONAL
4 JOSIAH CHIMANZO RD
BELMONT
BULAWAYO
ZIMBABWE

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information provided by Conservation Force, Buby and Save Valley Conservancies, and Zimbabwe authorities.
CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. ~~If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.~~

~~I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.~~

~~Taxidermist/Broker's signature: _____ Date: _____~~

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: Phy Date: 2-2-16

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):
John J. Jackson, III or Regina Lennox of Conservation Force
504-837-1233, jjw-no2@att.net or regina.lennox@conservationforce.org
12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?
- ☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed African lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

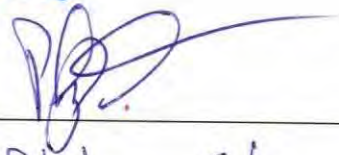
I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion trophy at the following address:

John J. Jackson, III
Regina Lennox
Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: jjw-no2@att.net
E: regina.lennox@conservationforce.org

Signed: _____

Name: _____

Date: _____



Philip Glass

2-12-16

RCVD APR 27 2016

PHILIP (b) (6) GLASS 88-1300/1113 (b) (6)

(b) (6)

WATER VALLEY, TX (b) (6)

2-12-16

Shield™

Pay to the order of USFWS \$100.00

One hundred & no/100

HOT CIRCLE SIX

SONORA BANK
5710 Sherwood Way • San Angelo, Texas 76901
2502 Southland Blvd. • San Angelo, Texas 76904

Heat Reactive Ink

MP

(b) (6)



Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual				
1.a. Last name HALEY	1.b. First name TIMOTHY	1.c. Middle name or initial (b) (6)	1.d. Suffix	
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Organization (b) (6)	5. Affiliation/ Doing business as (see instructions) (b) (6)	
6.a. Telephone number (b) (6)	6.b. Alternate telephone number (b) (6)	6.c. Fax number	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 PALO ALTO	1.c. State CA	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province (b) (6)	1.f. Country USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) SAME				
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. [Signature] Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)	
01/31/2016 Date of signature (mm/dd/yyyy)	

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (*Appendix I of CITES and/or ESA*)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

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Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting, please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

AFRICAN LION, PANTHERA LEO MELANOCHEITA

b. Sex (if known).

MALE

2. IF ANIMAL IS CURRENTLY LIVING IN THE WILD, please enter the following:

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

ZIMBABWE, ZAMBEZI VALLEY, HURLINGWE SAFARI AREA, RIFA CONCESSION
CHIRUNDU TOWN, MARONCOLI AREA HQ

b. Date wildlife is to be hunted:

15th APRIL 2016 - 10th MAY 2016

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

SKIN, SKULL, CLAWS, TEETH

3. ~~IF THE ANIMAL IS DEAD~~, please enter the following:

a. ~~Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):~~

b. ~~Date wildlife was hunted:~~

- c. ~~Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).~~
- d. ~~The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents];~~

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: OUTBOUND EXPORTERS,
 Business Name: OUTBOUND EXPORTERS
 Address: 5 GRANTHAM ROAD
 Address: BELMONT
 City: BULAWAYO
 State/Province: ZIMBABWE - AFRICA
 Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

PLEASE SEE INFORMATION SUBMITTED WITH THIS FORM AND PREVIOUSLY SUBMITTED BY CONSERVATION FORCE, - ZIMBABWE
CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below) *OPERATION CONSERVANCIES, + GOVERNMENT*

6. **If you are a broker or taxidermist applying on behalf of a foreign national**, provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  Date: 1/31/2016

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/e/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).
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):
APPLICANT OR JOHN JACKSON AT CONSERVATION FORCE
504 837 1233 JJW-002 @ ATT.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.

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed African lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion trophy at the following address:



John J. Jackson, III
Regina Lennox
Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: jjw-no2@att.net
E: regina.lennox@conservationforce.org

Signed: _____

Name: _____

Date: _____

RCVD APR 27 2016

TIMOTHY (b) (6) HALEY		(b) (6)	
MENLO PARK, CA (b) (6)			
		February 25, 2016 Date	
Pay to the Order of	US Fish + Wildlife Service	\$	100.00
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CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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Mr. Timothy Van Norman**Chief, Branch of Permits****U.S. Fish and Wildlife Service****5275 Leesburg Pike****Falls Church, Virginia 22041-3803****BOARD OF DIRECTORS:****JOHN J. JACKSON, III, J.D.****PHILIPPE CHARDONNET, D.V.M.****GERHARD DAMM****BERT KLINEBURGER****DON LINDSAY****SHANE MAHONEY****DALE TOWELL, Ph.D.**

April 20, 2016

Dear Chief Van Norman:

Enclosed please find five applications for permits to import the sport-hunted trophies of African lion (*P. l. melanochaita*) from Zimbabwe. In evaluating these applications, please consider the enclosed information and the information previously submitted by Conservation Force, Bulye Valley Conservancy, Zimbabwe's Parks and Wildlife Management Authority, and others. An index of documents submitted by Conservation Force is enclosed with this letter.

This information demonstrates that Zimbabwe's hunting program enhances the survival of the lion in the wild for three main reasons: (1) the hunting program is well-managed scientifically-based, and sustainable; (2) Zimbabwe's lion management addresses the three primary threats to lion (e.g., loss of habitat and prey base, and human-lion conflict); and (3) U.S. hunter revenues are ploughed back into lion conservation and provide critical incentives for landholders to manage lion at high densities.

I. Zimbabwe's conservation hunting program is well-managed, sustainable, and science-based.

A. The hunting program is governed by an effectively and adaptively implemented "Conservation Strategy and Action Plan."

Lion in Zimbabwe are adaptively managed and hunted under the Conservation Strategy and Action Plan (Action Plan).¹ The Action Plan is the result of a participatory workshop involving lion scientists, NGOs, industry representatives, and other stakeholders.² Both the Action Plan's "Vision (Long-term objective)" and "Goal (Immediate objective or purpose)" incorporate the sustainable use of lion:

4.1 Vision (Long-term objective)

Lions conserved and managed sustainably for their aesthetic, cultural and ecological value, and the socio-economic development of Zimbabwe.

4.2 Goal (Immediate objective or purpose)

¹ Zimbabwe Parks and Wildlife Management Authority (PWMA), Conservation Strategy and Action Plan for the Lion (*Panthera leo*) in Zimbabwe (Action Plan).

² Action Plan, p. 6; PWMA, Conservation Status of the African Lion (*Panthera leo*) in Zimbabwe (Jan. 2015) (Non-Detriment Finding), p. 22.

*To secure and where possible, restore as many viable lion populations as possible ... whilst mitigating their negative impact and enhancing the value for the benefit of people through sustainable use.*³

The Action Plan identifies targets, outputs, and detailed activities to conserve the lion, and describes the roles and responsibilities of the stakeholders involved in lion management. Among the main targets are: to improve data collection and research; to increase community benefits; and to ensure licensed hunting is sustainable. These targets have been met.

Target	Achievement
To improve data collection and research	Current density and population estimates are available for ~70% of Zimbabwe's lion range ⁴ Long-standing research partnerships with Wild CRU (1999) and other scientists (2007) have been established ⁵
To increase community benefits	Increased benefits-sharing has been the norm since the 2007 revision of the CAMPFIRE Revenue Sharing Guidelines requiring that 55% of fees are to be deposited in producer ward accounts, and 41% of the fees are directed to Rural District Councils for infrastructure building and projects ⁶
To ensure licensed hunting is sustainable	In 2013/2014, Zimbabwe adopted or reconfirmed its best practices to ensure the sustainability of legal hunting ⁷

These efforts show how the Action Plan is being successfully implemented and its targets achieved, and that Zimbabwe is properly managing its lion population and sustainable use-based hunting program.⁸

B. Zimbabwe's lion hunting program was updated in 2013 to enhance its sustainability.

Since July 2013, Zimbabwe's lion hunting regulations have been updated to ensure sustainability and the adoption of best practices, an "internal reform ... that is actively participated in and supported by all of the relevant stakeholders," including the Zimbabwe Parks and Wildlife Management Authority (PWMA), non-governmental organizations, professional hunters and safari operators, CAMPFIRE districts, and scientists and researchers.⁹ These updates included the adoption of an age-based approach to lion hunting and the

³ *Action Plan*, p. 9.

⁴ *Non-Detriment Finding*, p. 8-10; Dr. B. du Preez, Dr. R. Groom, O. Mufute, R. Mandisodza-Chikerema, Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion (*Panthera leo*) Conservation in Zimbabwe (Jan. 31, 2016) (*Zimbabwe Lion Conservation Report 2016*), p. 5-7.

⁵ Dr. B. du Preez, Buby Valley Conservancy Lion Research Report (Jan. 12, 2016) (*BVC Report*), p. 5-6; *Zimbabwe Lion Conservation Report 2016*, p. 4, 13, 21. The team of researchers at Buby Valley Conservancy is large and impressive, and includes an orphaned rhino manager. See www.bubyvalleyconservancy.com/team.

⁶ CAMPFIRE Association, *Hunting in CAMPFIRE Areas* (2014).

⁷ L. Muller, Chair, Zimbabwe Professional Hunters & Guides Association, Letter re: Lion Import Suspension (ZPHGA Letter) (Jan. 20, 2016), p. 1.

⁸ Some management units have their own plans. For example, in 2011 Savé Valley Conservancy commissioned a lion management plan "to provide members with a science-based plan to help them ethically and sustainably manage their lion population," and which "specifically advocates the use of hunting as a conservation management tool. It demonstrates willingness by the conservancy to guide their lion management based on science and advice from professionals." Dr. R. Groom, *Hunting in Zimbabwe's Savé Valley Conservancy* (Jan. 27, 2013) (*SVC Report*), p. 4.

⁹ *Zimbabwe Lion Conservation Report 2016*, p. 5.

imposition of penalties for harvest of lions younger than five;¹⁰ revision of the annual quotas and use of an adaptive quota-setting approach based on results of the lion aging approach; the removal of female lions from hunting quotas; and the termination of fixed quotas.¹¹

These updates are being effectively implemented. The lion aging is conducted by PWMA and overseen by the non-profit Panthera. Operators and PHs immediately adopted the age-based approach. One year after its adoption, harvest of underage lion represented only 20% of total offtakes.¹² This approach is allowing male lions to mature and increasing the numbers of older males.¹³ Zimbabwe's sport-hunting program for lion is sustainable, and the benefits outweigh the limited offtake.

C. Using the best-available information Zimbabwe's Scientific Authority concluded that hunting is not detrimental to the survival of the lion.

Zimbabwe's lion hunting is permitted subject to a Non-Detriment Finding made in January 2015.¹⁴ In this finding, PWMA, the CITES scientific authority, concluded:

The species contributes positively to the livelihoods of local communities through sport hunting. Hunting also contributes to the conservation of lions through financial benefits that are ploughed back into conservation and that local communities use for rural development programmes. Trophy hunting of the lion is undertaken through a strict scientific based quota setting process with an objective of ensuring that utilization and any form of harvesting is sustainable.

The African lion population is increasing in most areas. Research and monitoring of the species is being done collaboratively with external researchers and there is a lot of baseline information and publications. Zimbabwe has a lion management plan and strategy that is being implemented and reviewed on a regular basis. Rigorous monitoring of trophy hunting through adaptive management principles is carried out in Zimbabwe and non-detrimental findings are conducted for all exports. *In conclusion, harvesting and any other forms of off take are not detrimental to the survival of the African lion in Zimbabwe.*¹⁵

PWMA based its finding on current estimates from primary lion range areas, reflecting a lion population of at least 2,346.¹⁶ But that did not even include updated estimates from Bulye Valley Conservancy (BVC) and Savé Valley Conservancy (SVC), which increase the 2016 estimate to approximately 2,600 lions.¹⁷ Both

¹⁰ PWMA, *Age Restrictions on Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe* (2014).

¹¹ *Zimbabwe Lion Conservation Report 2016*, p. 24; ZPHGA Letter, p. 1-3. Other steps taken include the creation of an Ethics Committee, currently charged with updating the Code of Conduct and "best practices" manual for Zimbabwe's operators and professional hunters. Dr. C. Masterson (Ed.), *Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe*, Ethics and Coordination Committee for Ethical and Substantial Safari Hunting in Zimbabwe (Apr. 12, 2016) (*The Role of Hunting in Conservation and Livelihood Resilience*), p. 8, 16.

¹² ZPHGA Letter, p 4; see also L. Muller, Rifa Safari Area/Pro Safaris Africa, *Report on Lion Panthera Leo* (Jan. 25, 2016) (*Pro Safaris Report*), p. 2.

¹³ E.g., *Pro Safaris Report*, p. 2.

¹⁴ *Non-Detriment Finding*, p. 1.

¹⁵ *Id.* at 1 (added emphasis).

¹⁶ *Id.* at 11.

¹⁷ The current population estimate for Zimbabwe's major lion areas is approximately 2,600 individuals (Hwange-Matetsi Complex: 750, South Eastern Lowveld: 350, Gonarezhou National Park: 60, Malilangwe: 37, Savé Valley Conservancy: 284, Bulye Valley Conservancy: 500, Mid-Zambezi Valley

populations grew from reintroduced lion and have skyrocketed since the introductions.¹⁸ Populations in Hwange and Gonarezhou National Parks have also increased since the late 2000s.¹⁹ The 2015 IUCN *Red List* assessment for African lion acknowledges this growth. It inferred population declines in many parts of the lion's continental range, but *not* in Zimbabwe. Rather, the *Red List* pointed to an overall *increase* in sample lion populations in Zimbabwe.²⁰

Based on this large population size, data from stakeholders (including hunting operators, who often track lion sightings in their areas),²¹ and aging returns from the 2014 season, PWMA scientists set a 2015 quota of 85 lions.²² This represents approximately 3.62% of the population, and it is well within the guideline of <5% for a sustainable offtake. This quota is carefully allocated based on the type of land use. On state-protected lands (i.e., the PWMA and Forestry Estates), a lower quota is allocated than on communal lands, as managed hunting is used to mitigate human-lion conflict in some communal areas.²³ Lion are extremely dense on private conservancies, and the quotas are allocated based on this density.²⁴

However, because of the age-based limitation on lawful lion trophies, actual offtake is far below the quota. In 2015, only 39 lions were harvested representing ~46% of the quota and only 1.5% of a population of

Complex: 600], though the actual number would be larger if there were data available for the countries [sic] minor lion areas that are yet to be surveyed] (ZPWMA 2015).

Zimbabwe Lion Conservation Report 2016, p. 6.

¹⁸ In BVC, 13 lions were reintroduced and four "broke in" in 1999. From those 17, the population has grown to ~280 in 2009, "when robust population surveys were initiated," to over 500 lions today. *BVC Report*, p. 3. In SVC, the lion was reintroduced, and that and other reintroductions have given the conservancy its strong wildlife base:

Trophy hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, re-stock game, and improve security, especially because of the significant numbers of black rhino now found there.

SVC Report, p. 2; see also *Zimbabwe Lion Conservation Report 2016*, p. 12-19.

¹⁹ Lion populations can increase in abundance rapidly and can "achieve exponential growth rates." *Zimbabwe Lion Conservation Report 2016*, p. 8. Regulated, managed sport-hunting does not affect growth rates. *Id.* To the contrary, as the Non-Detriment finding suggests, hunting is not a population control method; however, the "positive aspects of sport-hunting as a conservation tool include a focus on males and a low percentage off-takes; neither of which generally jeopardise populations and also suggest that hunting could play a role in population recovery." *Id.*; *Non-Detriment Finding*, p. 1.

²⁰ H. Bauer et al., *Panthera Leo*, The IUCN Red List of Threatened Species (2015), <http://dx.doi.org/10.2305/IUCN.UK.2015-4.RLTS.T15951A79929984.en> ("Table 3 ... shows the estimated Lion population size in 1993 and 2014 for each of the 47 sample subpopulations ... It can be seen that most countries had a declining trend ... with only four countries (India, Namibia, South Africa and Zimbabwe) seeing a growth trend ... The sample Lion population in five countries (Botswana, India, Namibia, South Africa, Zimbabwe) grew by an estimated 12%, whereas the Lion population in the remaining African range countries declined by an estimated 61% ...").

²¹ *E.g.*, *Pro Safaris Report*, p. 1 (observed at least 68 lions in the Rifa SA as of August 2015: "Population estimates are done with daily game sighting reports by Professional Hunters and Game Scouts ... camera traps and spoor counts done during the season"; operator also monitors prey base including buffalo, kudu, eland, impala, zebra, hippo, etc. and keeps population counts based on sightings/tracking; in 2015 observed 1,829 impalas and 646 buffalo in area); Cliff Walker Safaris, *Enhancement Report (2016) (CWS Report)* (showing tracking of 360 lions over 14 hunts in three seasons, including 97 males).

²² *Zimbabwe Lion Conservation Report 2016*, p. 9.

²³ *Id.* at 18.

²⁴ *E.g.*, *id.* (density for BVC is ~0.187 lions/km²) ("The success of the [BVC], in terms of both its hunted lion and non-hunted rhino populations, provides the incentive for other areas in the country to sustainably manage their wildlife resource...").

2,600 lions.²⁵ Because the offtake was lower, the precautionary 2016 quota has adaptively been set at 75 lions, representing only 2.9% of the population.²⁶

Although the biological impact of the offtake is minute, its financial impact is not. The estimated value of selling the full lion quota is \$6,800,000.²⁷ The value of daily fees for just the lion harvested is \$2,800,000.²⁸ Assuming an average land management cost of \$150 per km², sale of the lion quota can support 45,333 km² in habitat²⁹ – an area almost the PWMA Estate (~50,000 km²) and about the size of Kenya's national parks and national reserves (44,702 km²).³⁰

Based on the effective implementation of Zimbabwe's carefully crafted aging approach, the science-based and sustainable quota, the limited offtake, and the "benefits that are ploughed back into conservation and that local communities use for rural development programmes," Zimbabwe's Scientific Authority properly concluded there is "no net harm" from the limited, regulated offtake, the net benefits of hunting greatly outweigh the limited offtake, and it is not detrimental to the species' survival. The critical role of regulated and sustainable hunting is evident in the fact that "Safari hunting demonstrably remains the single largest source of funding for wildlife-based land use and Community Based Natural Resource Management (CBNRM) in Zimbabwe – providing financial incentive to conserve."³¹

II. Zimbabwe's lion hunting and conservation program sufficiently address the three main threats to lion.

A. Sport-hunting in Zimbabwe extends the available protected lion range and incentivizes the use of communal and private land as habitat.

Protected areas in Zimbabwe cover more than 100,000 km² and include national parks, safari areas, private conservancies, and CAMPFIRE.³² National parks cover about 27,000 km², but hunting areas exceed 76,000 km² (including approximately 19,000 km² in safari areas; ~7,000 in conservancies, and 48,000 in CAMPFIRE areas).³³ "Hunting remains by far the highest earner of revenue sustaining biodiversity conservation and wildlife-based land use in Zimbabwe – be it under communal, private or state tenure. Hunting revenues not only incentivise and pay for wildlife as a primary land-use option on private and communal land, but

²⁵ *Id.* at 9.

²⁶ *Id.* In sum: Zimbabwe's quotas are based on scientific population density information, determined by experts and adaptively managed in accordance with the aging restrictions, and allocated by area according to density. The age-based approach and maximum quota conform to the best available scientific information and best practices as the FWS identified in the Final Rule.

²⁷ Assuming an average safari cost of \$80,000 is low. *Zimbabwe Lion Conservation Report 2016*, p. 22; *CWS Report* (average cost of \$107,000).

²⁸ *Id.*

²⁹ *Id.*

³⁰ PWMA, Website, www.zimparks.org/index.php/about-us/profile; IUCN/UN, 2014 United Nations List of Protected Areas, <http://blog.protectedplanet.net/post/102481051829/2014-united-nations-list-of-protected-areas>.

³¹ *The Role of Hunting in Conservation and Livelihood Resilience*, p. 1, 7.

³² This does not include the sizable forest reserves, many of which allow licensed safari hunting. See also *The Role of Hunting in Conservation and Livelihood Resilience*, p. 1, 17-18.

³³ CAMPFIRE Association, *Hunting in CAMPFIRE Areas* (2014); IUCN/UN, 2014 United Nations List of Protected Areas, <http://blog.protectedplanet.net/post/102481051829/2014-united-nations-list-of-protected-areas>.

so too, in the face of ever mounting pressure for land, does it stave off political and social pressure to de-gazette protected areas (PA's) on state land."³⁴

The Community Areas Management Program for Indigenous Resources (CAMPFIRE) program "is premised on the conservation of wildlife and other natural resources as a livelihood option for rural communities in marginal areas of Zimbabwe."³⁵ CAMPFIRE provides habitat and anti-poaching protection for wildlife, and generates revenues for poor rural communities.³⁶ It benefits wildlife and people both. Through CAMPFIRE the revenues from hunting help to increase local tolerance and decrease human-lion-livestock conflict.³⁷ But for the revenues generated from lion hunting, it is unlike CAMPFIRE communities would be willing to tolerate lion at the levels they do.³⁸

As for private land, Conservation Force sent three previous reports describing the habitat supporting the large wildlife populations in BVC and SVC. "In fact, 3 of the last 10 IUCN Key 1 Populations of Black Rhino remaining in Africa are to be found on private hunting conservancies in Zimbabwe."³⁹ BVC and SVC (~6,800 km²) depend entirely on revenue from sport hunting to fund their operations.⁴⁰

Without sport-hunting, this habitat would likely return to cattle ranching, and large populations of wildlife would be lost. Likewise, without the incentives generated through hunting, much CAMPFIRE land would be lost as habitat. This is *not* conjecture. It is empirical fact, based on the limited and inconsistent demand for non-consumptive tourism in Zimbabwe.⁴¹

Both communal and private areas have tried and failed to attract sustainable photographic tourism, due to "a combination of intractable contributing factors – from the global recession and downturn in tourism to poor international perception and desirability of Zimbabwe as a tourist destination, compounded by a severely depressed local economy, decaying infrastructure and diminished road and air-travel access. The industry operates at well below 50% occupancy based on current beds available and there is not a single

³⁴ *The Role of Hunting in Conservation and Livelihood Resilience*, p. 2.

³⁵ CAMPFIRE Association, *Hunting in CAMPFIRE Areas* (2014).

³⁶ *Id.*; *The Role of Hunting in Conservation and Livelihood Resilience*, p. 2, 17.

³⁷ *Id.* (As of 2014, "CAMPFIRE generates on average US\$2 million in net income every year which is much lower than estimated potential earnings for the Program. Income generation is mostly through the lease of sport hunting rights to commercial safari operators, as well as sales of hides and ivory, tourism leases on communal land and other natural resources management activities. As an industry, safari hunting has proven to be robust both environmentally and economically and, although not unscathed, [has been] fairly resilient in the face of serious socio-political uncertainty ... Although human encroachment and poaching has affected some communal wildlife areas in recent years, the CAMPFIRE program at national level still protects an area of wild land in excess of 50,000km², roughly equivalent in extent to the Parks and Wildlife Estate (Table 1). There are over 200,000 households that actively participate in the Program in CAMPFIRE hunting areas. Revenue received by communities, though relatively small, is used to directly offset the costs of living with wildlife through employment of game scouts or resource monitors.").

³⁸ *Zimbabwe Lion Conservation Report 2016*, p. 14; *Non-Detriment Finding*, p. 6-7, 9.

³⁹ *The Role of Hunting in Conservation and Livelihood Resilience*, p. 3.

⁴⁰ *SVC Report*, p. 5-6; *BVC Report*; M. Schwartz, National Geographic Cat Watch (Feb. 25, 2016) ("remember that the BVC used to be a cattle-ranching area, and if wildlife becomes unviable, then there is no reason not to convert it back to a cattle ranching area again"). See also IUCN, *Briefing Paper: Informing Decisions on Trophy Hunting* (2016), p. 2, 5, 7, 12.

⁴¹ *The Role of Hunting in Conservation and Livelihood Resilience*, p. 24; *SVC Report*, p. 2-3 ("Sport hunting and trophy hunting became the only economically viable land use options and have remained the only tangible source of income to the landowners of the SVC. In the case of the Senuko Lodge, for example, the land reform program resulted in a 98% cancelation of the confirmed bookings.").

working example of a community-owned non-hunting tourism venture catering to international clientele in the country.”⁴² Given Zimbabwe’s poor economy it is difficult to see them trying again, as photo-tourists require greater infrastructure and accessibility than hunting tourists do.⁴³ Sport-hunting alone incentivizes the preservation of most habitat in Zimbabwe.⁴⁴ “In Zimbabwe, over 75% of all conservation land under private, community and state tenure is entirely dependent on safari hunting revenues...” (7.9 million ha).⁴⁵

Hunting also incentivizes and pays for *improvements* in wildlife habitat. For example, BVC and SVC spend significant revenue on water provision. A smaller operator, Pro Safaris spends 6% of its gross turnover on “conservation,” largely for “water points installation, pipeline maintenance, water pumping, and de-silting of water pans...”⁴⁶ Water holes are one of the ways safari operators routinely improve available habitat.⁴⁷

Without hunting wildlife exists only in national parks. By providing, securing, and improving habitat, sport-hunting provides enhancement for the lion.

B. Sport-hunting in Zimbabwe provides significant anti-poaching support to protect the lion’s prey base.

Hunting revenues underwrite much of the anti-poaching which allows the lion’s prey base to flourish, and which thereby allows lion populations to grow. For example:

- In 2015 BVC spent \$590,000 in funds generated exclusively from sport-hunting to employ scouts, purchase equipment, and cover anti-poaching.⁴⁸ BVC protects the world’s third largest population of black rhino and incurs significant anti-poaching expenses to keep them secure from poachers.⁴⁹
- On average, SVC spends \$546,000 annually on anti-poaching, including a large expenditure for the protection of their black rhino population (approximately \$200,000/year).⁵⁰ The funds are largely generated from sport-hunting and donations from clients.⁵¹
- The Dande Anti-Poaching Unit (DAPU) in the Zambezi Valley is among the most successful. They reduced elephant poaching in their concessions from 40 carcasses in 2010 to only three in 2015. DAPU supports 22 community scouts and 18 council scouts. In 2014, they picked up 2,375 snares,

⁴² *The Role of Hunting in Conservation and Livelihood Resilience*, p. 3.

⁴³ *Id.* at 24 (“By comparison to [photo]-tourism, safari hunting operates on much higher income per tourist with much lower tourist throughflow and total bed-nights and requires far less capital outlay for accommodation and hospitality infrastructure. Not only are these extremely important considerations in the context of the poor socio-economic and political climate for investment and tourism in Zimbabwe ... Public health scares such as Ebola, terrorism, political unrest and social disturbances have had demonstrably serious impact on tourism traffic to different parts of Africa and is especially true of non-consumptive ecotourism which is far more sensitive to such deterrents than is trophy hunting ...”). See also IUCN, Briefing Paper: Informing Decisions on Trophy Hunting (2016), p. 8.

⁴⁴ Sport hunting incentivizes the preservation of an area larger than Kenya’s national parks. CAMPFIRE areas alone represent almost 50,000 km², and Kenya’s NPs are only ~47,000. See IUCN/UN, 2014 United Nations List of Protected Areas, <http://blog.protectedplanet.net/post/102481051829/2014-united-nations-list-of-protected-areas>.

⁴⁵ *The Role of Hunting in Conservation and Livelihood Resilience*, p. 11-12, 17-18.

⁴⁶ *Pro Safaris Report*, p. 3.

⁴⁷ See, e.g., *CWS Report*; *Zimbabwe Lion Conservation Report 2016*, p. 18.

⁴⁸ *Zimbabwe Lion Conservation Report 2016*, p. 20 (this amount does not include incentives and rewards donated for these purposes).

⁴⁹ *BVC Report*, p. 5.

⁵⁰ *Id.* at p. 5.

⁵¹ *SVC Report*, p. 5-6; *Zimbabwe Lion Conservation Report 2016*, p. 20.

convicted 19 meat poachers, retrieved 22 weapons, and paid over \$9,000 in rewards.⁵² This unit is wholly funded by hunting operator Charlton McCallum Safaris, and the contributions of its safari clients.⁵³ By protecting the lion's prey base, DAPU is significantly supporting lion conservation.

- Pro Safaris in the Rifa Safari Area contributes 39% of their gross revenue to PWMA, which supports wildlife management and monitoring as well as PWMA anti-poaching rangers.⁵⁴ They spend 6% of their gross to fund their own anti-poaching unit of ten scouts. Their team coordinate with PWMA rangers to police the 40-km international border with Zambia and an area covering ~506 km² (close to the size of Redwood National and State Parks in California combined). Ivory poaching is a threat, and funds generated from hunting help protect the elephant and other prey in the area.⁵⁵
- In 2013-2014, the anti-poaching teams supported by Martin Pieters Safaris conducted 289 patrols, recovered 165+ snares (a total of 15,000+ since 2007), recovered five firearms and ammunition, recovered four pairs of tusks as well as poached fish and meat, and arrested 123 poachers.⁵⁶ This company spends more than \$40,000/year on anti-poaching in their concessions.⁵⁷
- Martin Pieters Safaris is also helping establish a communal conservancy in the Omay area that has two seven-man anti-poaching teams. They have been extensively trained in weapons, tactics, and offensive maneuvers with the operator's support. This unit has branched into Gokwe and other communal lands, and cooperates extensively with Police and community scouts. As of November, this unit arrested over 120 poachers and traffickers, many of whom were hardened, professional poachers whose removal significantly benefits the lion's prey base.⁵⁸
- In March, a safari operator father and son lost their lives in a tragic accident as they were waiting to assist an anti-poaching patrol.⁵⁹ They dedicated their funds, their time, and ultimately their lives to protecting wildlife. The commitment of hunting operators cannot be questioned. Their efforts are obviously enhancement for the lion and other species.

These are but a few examples of the essential support safari operators provide to maintain and increase the lion's prey base, addressing this threat and enhancing the survival of the lion in the wild.

⁵² DAPU, Year-End 2015 Report (Oct./Nov. 2015), p. 9-20; DAPU, End-of-Year Report (Oct.-Dec. 2015).

⁵³ *Id.* at 3, 19.

⁵⁴ *Pro Safaris Report*, p. 3.

⁵⁵ *Id.*; see also *CWS Report*.

⁵⁶ Martin Pieters Safaris, Sustainable Use Benefiting Communities, Blog (Nov. 18, 2015); Martin Pieters Safaris, Lion Data (2016) (*M.P. Report*), p. 9.

⁵⁷ Martin Pieters Safaris, Anti-Poaching ... Fighting Back (African Conservancies Anti-Poaching 2015), Blog (Jan. 26, 2016).

⁵⁸ *Id.*

⁵⁹ The Zambezi Society, Factual Report on the Tragic Deaths of Two Wildlife Conservation Volunteers in Mana Pools National Park (Mar. 14, 2016), <http://www.zamsoc.org/?p=2121>; see also The Zambezi Society, Update Letter (Apr. 2016) (offering memorial to these operators; also describing the operations of MAPP, an anti-poaching unit run by another hunting operator), <http://us10.campaign-archive1.com/?u=f4943277ce971cb1c9028d068&id=a10245916e&e=959ad7ac3f>.

C. Sustainable use through sport-hunting is essential to reducing human-wildlife conflicts and the success of Zimbabwe's community based conservation program.

Sustainable use, largely through sport-hunting, is a pillar of CAMPFIRE.⁶⁰ This is due to the basic principle that co-existence of wildlife and people is improved, and people are more tolerant of the negative effects of wildlife, if wildlife has value.⁶¹ For instance, lion "hunting contributes to the conservation of lions via the financial revenue generated [through CAMPFIRE], which is ploughed back into conservation of the resource and empowers local communities to invest in their own rural development programs."⁶²

Consistent with CAMPFIRE revenue-sharing guidelines, hunting operators in communal areas pay a large percentage of revenues and fee income to the communities. For example, in the Dande area one operator pays well over 40% of gross sales to CAMPFIRE wards and councils. When payments to the government are included, the company retains less than half its income.⁶³ Like many others in Zimbabwe, the company believes "People MUST get FAIR value for their game, or all is lost," "make[s] sure that all hunting proceeds are correctly channelled [sic] in to producer ward accounts," and operate with "[s]trong social responsibility i.e. we allocate \$67,000 per annum to District and Ward projects and we ensure there is transparency."⁶⁴

In the Omay area, Martin Pieters Safaris and its associates contribute over \$200,000 annually "straight to the producer communities for community developmental projects."⁶⁵ In 2013-2014 the communities used these funds for a range of projects, including but not limited to:

- Building or repairing five teachers' houses, ten classrooms/blocks, and four administrative offices;
- Building or obtaining school supplies including two blackboards;
- Rehabilitating three water pipelines or boreholes;
- Constructing feeder roads;
- Obtaining or repairing heavy equipment including one tractor;
- Helping the community obtain construction materials, build toilets, and use funds for traditional ceremonies.⁶⁶

These direct benefits increase tolerance, and thus increase numbers of wildlife, in an area of ~8,094 km².⁶⁷ "Communities receive direct benefit both financially and through various projects implemented by Martin Pieters Safaris such as clinics, schools, vehicles for anti-poaching and the employment of scouts."⁶⁸ These benefits arise in "a remote inhospitable concession that has no other land use model due to very erratic

⁶⁰ CAMPFIRE Association, *Hunting in CAMPFIRE Areas* (2015); CAMPFIRE Association, Website ("Vision: To see rural communities in Zimbabwe freed from the vagaries of poverty and enjoying the benefits of the sustainable use of their natural resources ..."); see also *M.P. Report*, p. 1; IUCN, *Briefing Paper: Informing Decisions on Trophy Hunting* (2016), p. 4-7.

⁶¹ *Zimbabwe Lion Conservation Report 2016*, p. 11; see also Chiefs, EU in Wildlife Talks, *The Herald* (Apr. 2, 2016), <http://www.herald.co.zw/chiefs-eu-in-wildlife-talks/>.

⁶² *Id.*

⁶³ DAPU, *Year End Report* (2015).

⁶⁴ *Id.* at p. 3

⁶⁵ *M.P. Report*, p. 1-7; Martin Pieters Safaris, *Sustainable Offtake Benefiting Communities*, Blog (Nov. 18, 2015).

⁶⁶ *Id.*

⁶⁷ *Id.*

⁶⁸ *Id.*

and low rainfalls, and abundance of mosquitos, tsetse flies and poor soils. The only benefit local people have, is to receive financial remuneration from hunting safari off take and employment.”⁶⁹

Outside of communal areas, hunting also generates benefits for rural Zimbabweans. Operators contribute to enhancing quality of life for those impacted by wildlife to incentivize tolerance and conservation. These contributions are made in cash, much-needed goods or services, and game meat.

For example, BVC’s community assistance projects include drilling and equipping eight boreholes, building a clinic and staff houses with electrification and running water, contributing sport uniforms and transport for the youth soccer program, and more. According to the Conservancy’s manager, “the identifiable costs of the clinic amount to just over \$178,000 but there are many other hidden costs involved.”⁷⁰

Over and above these contributions, BVC has contributed 1,600 kg of meat each month since July 2011 to a trust administered by local chiefs to provide protein for school and community events and allow for the sale of excess meat to fund community projects.⁷¹ Overall, BVC donates over 45 tons of meat annually to local communities.⁷²

Similarly, SVC supports nearby communities through cash, service, in-kind, and meat donations. In 2012, for example, the conservancies’ contributions topped \$100,000 and included provision of water, repair or construction of schools and clinics, payment of school fees, provision of computer equipment, and regular meat donations, among other things.⁷³ Game meat contributions are a key benefit for local people:

[SVC] recently entered into a mutually dependent agreement with the Chiefs representing communities surrounding ... The agreement links the communities to the natural resource utilisation that occurs through the business operation of the conservancy and opens up opportunities for local indigenous populations to share in wealth creation... The hunting tourism of the conservancy is currently the only form of income by which the surrounding communities can benefit. Revenues from lion hunting constitute a significant portion of inflow and thus an important part of the community benefits.⁷⁴

⁶⁹ *Id.* (“Every year several local villagers are killed or maimed by elephant, lion, buffalo, hippo and crocodile, they live in close proximity to these animals and only tolerate them because we as a hunting company give back to the community. It is very important for the protection of our wildlife in these remote areas that we continue to assist the RDC with anti-poaching continue to pay for the sustainable off take of a select quota, because if we do not, the locals will kill every animal, they will not tolerate wildlife disruptions to their families, be it through destruction of their crops on an annual basis, or the loss of their family members.”).

⁷⁰ B. Leatham (Mazunga Safaris), Email re: Community Assistance Program in BVC and attached spreadsheet (Jan. 20, 2016).

⁷¹ *Id.* Similarly, 1,000 kg of meat each (2,000 total) is donated to the Beit Bridge communities (since April 2014) and the Mwenezi communities (since Aug. 2013). *Id.*; *Zimbabwe Lion Conservation Report 2016*, p. 14-15; Conservation Imperative, *The Fate of the African Lion: Buby Valley Conservancy* (Aug. 4, 2015) (*Fate of the African Lion Film*), <http://theconservationimperative.com/?p=112> (game meat donations are a “direct spinoff” of the hunting program, and help build strong relationships with local chiefs. Any poachers found in the area are taken to the chiefs’ courts and prosecuted there, and “asked to compensate for the value of the animals killed and the compensation goes back to the community kitty.” This is a powerful community engagement system that benefits the wildlife directly.

⁷² *Zimbabwe Lion Conservation Report 2016*, p. 12 (BVC’s “meat donation is worth over US\$100,000 per year, and the communities are free to decide how they use it.”).

⁷³ *Id.*

⁷⁴ SVC Report, p. 5.

Hunting operators are also employers in a tough economy.⁷⁵ A small operator can employ 14-20 people; a medium operator can employ 14 staff, ten scouts, six trackers, and three professional hunters;⁷⁶ and a large operator like BVC can employ 350-400 staff and thereby support approximately 2,000 people.⁷⁷

It should also be noted that hunting clients make substantial contributions to local communities. One lion hunter expects to contribute over \$7,500 in gratuities during his safari, a “blue bag” donation, and perhaps an additional cash donation to a community or conservation purpose.⁷⁸ This is but one example –voluntary donations also help cover the anti-poaching expenses of DAPU, BVC, and SVC, among other things, and in turn this provides employment for local trackers and scouts.

The importance of these benefits cannot be overstated, because human-lion conflict is arguably the prime threat to lion in Zimbabwe.⁷⁹ This is one hunter of many, but put together these gifts provide considerable extra revenue for the poor and marginalized in a poor country, and sustain expensive anti-poaching efforts to protect endangered species. Added to the revenue/fee sharing and voluntary contributions from safari operators, hunting demonstrably benefits people, which in turn enhances the lion’s survival.

III. Revenue from U.S. hunters is used for conservation and maintaining viable lion populations.

The revenue generated from U.S. clients contributes hugely to lion conservation and habitat protection in Zimbabwe.

BVC and SVC each rely *solely* on the income from hunting, especially lion hunting, to fund their operations. Their clientele is overwhelmingly American.⁸⁰ These conservancies represent ~6,400 km² of former cattle ranches that instead host large and sustainable rhino, antelope, cheetah, wild dog, and lion populations (among others).⁸¹ The hunting of lion pays for the conservation of these other species, and the inability to sell lion hunts in their largest market puts the habitat, the prey base, the lion and all these other species at risk due to lack of funding. As BVC’s anti-poaching manager explained in a video sent to the FWS:

The BVC is about 3,000 square km ... It derives its whole income from hunting operations ... *Without the hunting there would be basically no reason for this area to exist or it would be a cattle area.* Having this large unit of land set aside for wildlife has meant that endangered species like black and white rhinoceros thrive here. We’ve got important populations of cheetah, wild dog as well, brown hyena, pangolins. So under the umbrella of hunting, this whole habitat is benefiting a whole variety of other species that are not consumptively hunted but they are benefiting from this wildlife area. Without hunting we would be very

⁷⁵ Zimbabwe faces a 95% unemployment rate. CIA World Factbook, <https://www.cia.gov/library/publications/the-world-factbook/geos/zi.html>.

⁷⁶ *Pro Safaris Report*, p. 3 (19% of turnover goes to salaries and on average supports 165 people; because concession is not located near a community, operator donates game meat to PWMA rangers and scouts, to government for state functions, and to orphanage, for total of 6,137 kg annually (\$12,250 and 2% of their gross income)).

⁷⁷ *CWS Report; Fate of the African Lion Film*.

⁷⁸ J. Hedgecock Statement (attached to import permit application); J. Hedgecock, pers. comm. (2015-2016).

⁷⁹ *Zimbabwe Lion Conservation Report 2016*, p. 11. Note that in a three-year period, seven people were killed.

⁸⁰ U.S. citizens represent over 90% of BVC and SVC’s respective clientele. *Zimbabwe Lion Conservation Report 2016*, p. 23; *SVC Report*, p. 4.

⁸¹ *Zimbabwe Lion Conservation Report 2016*, p. 4.

hard put to justify keeping this big expensive land in its current land use. The conservancy covers all its own anti-poaching costs. It is quite an expensive operation.⁸²

Lion hunting generates an estimated 33.9% of BVC's annual gross revenue – one-third of the funds needed to keep: the conservancy open as prime habitat, the anti-poaching patrols on the ground, and the future of the lion, black rhino, wild dog, and other species secure.⁸³ This is undoubtedly enhancement.

Likewise, as SVC reports, a "ban on lion trophy imports into the US will effectively result in a collapse of the lion hunting industry in the Savé Valley Conservancy, where on average 90% of hunting clients are American (up to 98% for some properties) ... The loss of the [approx.] \$375,000 annual revenue will be catastrophic for the conservancy, inevitably resulting in less investment in security and other conservation measures."⁸⁴

In short, the revenue from U.S. hunters is critical because lion in conservancies eat hundreds of thousands of dollars in huntable prey per year. And if the lions do not generate revenue there will be no incentive to maintain their large populations.⁸⁵

On a smaller scale, high-quality operators like Cliff Walker and Pro Safaris, which together police the Rifa Safari Area, could not exist but for U.S. clients. Mr. Walker maintains high hunting and conservation ethics and targets U.S. clients because they share these values.⁸⁶ Almost all (86%) of his clients are U.S. citizens paying an average of \$107,500 each in fees, which are ploughed back into Rifa SA, salaries, anti-poaching, and PWMA anti-poaching.

Similarly, lions are a major contributor to Pro Safaris' conservation/operating budget, and U.S. citizens are the main source of Pro Safaris' clients (75% of their lion were harvested by U.S. citizens).⁸⁷ The operator estimates that its conservation funding would fall by 36% if lion hunting declined because of an import ban. "Rifa Safari area has a small quota on all species. Lion therefore is a major contributor to the conservation of Elephant and the habitat to all species ... the Loss of the US Hunters will have a major negative impact on the survival of the viability of this area as a wildlife area."⁸⁸

U.S. hunters are huge contributors to Zimbabwe's conservation hunting program: they are the force that keeps Zimbabwe's hunters in business and keeps most habitat, anti-poaching, and CAMPFIRE benefits in place. Their presence enhances the survival of the lion, and their absence will do the opposite.

Conclusion

On the whole, the U.S. market represented "70.4% of the total Zimbabwean lion sport-hunting industry" between 2005 and 2015,⁸⁹ and that may even be higher. This means at least \$7 out of every \$10 directed

⁸² *Fate of the African Lion Film*; see also *Zimbabwe Lion Conservation Report 2016*, p. 20 ("saturation of lions in wildlife areas on both state and private land is positive for their future conservation security ... It is also critical to incidentally conserved endangered species, such as both species of rhino on private wildlife conservancies in Zimbabwe ..., which benefit from the same resources and protection incentivized and provided by the revenue generated from hunting").

⁸³ *Zimbabwe Lion Conservation Report 2016*, p. 22.

⁸⁴ *SVC Report*, p. 4.

⁸⁵ *BVC Report*, p. 5-6.

⁸⁶ *CWS Report*.

⁸⁷ *Pro Safaris Report*, p. 4.

⁸⁸ *Id.*

⁸⁹ *Zimbabwe Lion Conservation Report 2016*, p. 23.

to habitat protection comes from U.S. citizens. \$7 of every \$10 directed to anti-poaching comes from U.S. citizens (and that amount is likely higher given the voluntarily donations often made by U.S. clients). And \$7 of every \$10 contributed to communities to reduce human-lion conflict comes from U.S. clients. The contributions of U.S. clients are enhancing the survival of the lion in Zimbabwe far more than anyone else.

The Final Rule identified three primary threats to lion: loss of habitat, loss of prey base, and human-lion conflict. As shown here, in the enclosed, and in the previously submitted documents, U.S. citizens are the greatest contributors to efforts that reduce or remediate these threats. Sport-hunting in Zimbabwe, and lion hunting specifically, provides a reason to preserve thousands of kilometers of habitat for lion and prey species. It is the primary funder of the anti-poaching units that maintain or increase the lion's prey base. Hunting revenues provide the main funding for Zimbabwe's CBNRM program and the main contributor of other benefits to Zimbabwe's rural communities.

Because it substantially reduces the threats and contributes to the growth of Zimbabwe's lion population, Zimbabwe's well-managed sport-hunting program enhances the lion's survival. Accordingly, the enclosed permit applications, and those previously submitted, should be approved and permits issued.

We believe this information and the information already in the FWS' possession satisfies the requirements of 50 C.F.R. § 17.40(r) for Zimbabwe. We ask that you consider all that information in evaluating these permit applications. We will also continue to submit information about the benefits generated by safari hunting as it becomes available.

Sincerely,

John J. Jackson, III
Regina Lennox



Enclosures:

- Application submitted on behalf of Phillip Glass to import a sport-hunted lion trophy to be hunted in Nyaminyami CAMPFIRE Area, Zimbabwe
- Application submitted on behalf of Timothy Haley to import a sport-hunted lion trophy to be hunted in Rifa Safari Area, Zimbabwe
- Application submitted on behalf of Justin Hedgecock to import a sport-hunted lion trophy to be hunted in Matetsi Safari Area, Zimbabwe
- Application submitted on behalf of Eric Rau to import a sport-hunted lion trophy to be hunted in NW Matabeleland, Zimbabwe
- Application submitted on behalf of Cooper Ribman to import a sport-hunted lion trophy to be hunted in Buby Valley Conservancy, Zimbabwe
- Index of Documents Enclosed and Submitted

ENHANCEMENT INFORMATION ON THE AFRICAN LION

ZIMBABWE

No.	Title	Sent to FWS
1	Zimbabwe Parks & Wildlife Management Authority, Conservation Status of the African Lion (<i>Panthera leo</i>) in Zimbabwe (January 2015)	1/11/16
2	Zimbabwe Parks & Wildlife Management Authority, Age Restrictions on Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe (2014)	1/11/16
3	Dr. Byron du Preez [Oxford], Buby Valley Conservancy Lion Research Report (Jan. 12, 2016)	1/12/16
4	Blondie Leathem (Mazunga Safaris), Email re: Community Assistance Program in BVC, attaching spreadsheet (Jan. 20, 2016)	1/26/16
5	L. Muller, Chair, Zimbabwe Professional Hunters & Guides Association, Letter re: Lion Import Suspension (Jan. 20, 2016)	1/26/16
6	Dr. Rosemary Groom, Lion Hunting in Zimbabwe's Save Valley Conservancy (Jan. 27, 2013)	1/26/16
7	Dr. Byron du Preez et al., Zimbabwe Lion Conservation Research Report 2016: Sport Hunting and Lion (<i>Panthera leo</i>) Conservation in Zimbabwe (Jan. 31, 2016)	2/1/16
8	Conservation Imperative, The Fate of the African Lion: Buby Valley Conservancy (Aug. 4, 2015)	2/24/16
9	Martin Pieters Safaris, "Lion Data" (2016)	4/20/16
10	Michael Schwartz, Culling to Conserve: A Hard Truth for Lion Conservation, National Geographic Cat Watch (Feb. 25, 2016)	4/20/16
11	Zimbabwe Parks & Wildlife Management Authority, Conservation Strategy and Action Plan for the Lion (<i>Panthera leo</i>) in Zimbabwe	4/20/16
12	CAMPFIRE Association, Hunting in CAMPFIRE Areas (2014)	4/20/16
13	CAMPFIRE Association, Update to Hunting in CAMPFIRE Areas (2015)	4/20/16
14	Dr. C. Masterson (Ed.), Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe, Ethics and Coordination Committee for Ethical and Substantial Safari Hunting in Zimbabwe (Apr. 12, 2016)	4/20/16
15	L. Muller, Rifa Safari Area/Pro Safaris Africa, Report on Lion Panthera Leo (Jan. 25, 2016)	4/20/16
16	Cliff Walker Safaris, Enhancement Report (2016)	4/20/16
17	IUCN, Briefing Paper: Informing Decisions on Trophy Hunting (2016)	4/20/16
18	DAPU, Year-End 2015 Report (Oct./Nov. 2015)	4/20/16
19	DAPU, End-of-Year Report (Oct.-Dec. 2015)	4/20/16
20	Martin Pieters Safaris, Sustainable Offtake Benefiting Communities, Blog (Nov. 18, 2015)	4/20/16
21	Martin Pieters Safaris, Anti-Poaching ... Fighting Back (African Conservancies Anti-Poaching 2015), Blog (Jan. 26, 2016)	4/20/16
22	Nengasha Safaris, Letter re: Enhancement (2016)	4/20/16



Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name Hedgecock	1.b. First name Justin	1.c. Middle name or initial (b) (6)	1.d. Suffix —
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number (b) (6)	6.b. Alternate telephone number (b) (6)	6.c. Fax number —	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 Gallatin Gateway	1.c. State Montana	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province (b) (6)	1.f. Country USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) Same as physical address.				
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 14US47548B/9 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge. (b) (6) Justin Hedgecock Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) 01/14/2016 Date of signature (mm/dd/yyyy)	

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera leo Mekanochaita → Panthera leo Melanochaita
Common name - African Lion

b. Sex (if known).

Male

2. IF ANIMAL IS CURRENTLY LIVING IN THE WILD, please enter the following:

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

Zimbabwe, Matetsi Unit 5, Matabele Province, Victoria Falls
Unit 5 Camp 518 30 391 E025 55 290

b. Date wildlife is to be hunted:

September 1-21 2016

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

Full skin (including claws), skull, 2 floating bones, teeth

3. IF THE ANIMAL IS DEAD, please enter the following:

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

b. Date wildlife was hunted:

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Cuan Meredith
 Business Name: Trophy Consultants International
 Address: A Josiah Chinamano Rd,
 Address: Belmont
 City: Bulawayo
 State/Province: Matabeleland
 Country, Postal Code: Zimbabwe

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information submitted by Conservation Force & attachments & information subm by Zimbabwe Parks & Wildlife

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: Justin R. Hedgeworth Date: 01/14/2016

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

Same as physical address 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):

Justin Hedgecock (b) (6)

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

5. Enhancement

I, Justin Hedgecock, booked my 2016 lion safari with Cliff Walker, a native of Zimbabwe. Mr. Walker conducts hunts throughout Africa. Mr. Walker has provided information on enhancement (please see enclosed documents). Mr. Walker and I booked this lion Safari in Matetsi Unit 5, an area that is managed by Zimbabwe National Parks and Wildlife. The "Matetsi" blocks had historically been livestock areas. However, it was determined that the areas could generate more revenue through sustainable use hunting. Therefore, instead of killing off large numbers of predators to protect livestock the livestock was removed and wildlife reestablished overtime. The wildlife has been managed ever since. This has a positive effect on wildlife, reducing the human/wildlife conflict in these areas.

Zimbabwe National Parks and Wildlife manages Matetsi Unit 5, where this safari will take place. Please refer to information provided by Zimbabwe National Parks and Wildlife regarding additional proof of enhancement.

I, Justin Hedgecock, will be participating in the "Safari Club Blue Bag Program" on this safari. This means I will take a duffle bag with 50 pounds of humanitarian supplies (medical, dental, clothing, etc.) into the local community adjacent to our safari hunting area. As I have done on previous safaris I will meet with members of the local community and distribute these items. Probably the most important part of this meeting is when I sit down with members of the local community to discuss wildlife conservation, the importance of anti poaching, and learn what issues are going on at a local level with wildlife. If there is an issue that I am able to take action on to help wildlife, in particular on this safari to help lion, then I will. An example of where I have been involved in the past is providing funding for light aircraft anti poaching patrols in the Lake Natron region of Tanzania. I personally contributed \$2,500 to these efforts.

I, Justin Hedgecock, will also be taking additional funds with me, in the amount of \$7,500 that will be used for gratuities on this safari. This money will be divided among the professional hunter, camp staff, trackers, and anti poaching teams who are working on my behalf during the course of the safari. The impact of these funds is important to putting value on wildlife; it gives the local workforce a reason to protect wildlife, to protect the lion. These funds are distributed based on work ethic during the safari and how well I feel wildlife in the area is being cared for by these stewards.

Please do not hesitate to contact me directly with any additional questions. (b) (6)

ENHANCEMENT REPORT

Cliff Walker Safaris Africa

I. DESCRIPTION OF PROFESSIONAL HUNTER , COMPANY AND OPERATIONS

Cliff Walker started his hunting career, as a qualified Zimbabwean professional hunter, 21 years ago. He worked for 3 different operators for the first 16 years as a professional in 11 countries across Africa affording him opportunities to hunt almost every accessible huntable species on the continent.

Over his 21 years in the safari industry, Mr. Walker has successfully guided clients to 73 trophy lions in all manner of areas from Mozambique to Ethiopia - arguably making him the most experienced lion hunter in Africa alive, given the diversity of his operations.

Mr. Walker's passion for lion hunting steered him to form his own company, CLIFF WALKER SAFARIS (CWS), in 2008 - which would facilitate taking his own clients where they needed to go for the best chance at harvesting their dream lions.

CWS specializes in free range hunting of mature African lions in areas Mr. Walker himself deems to be sustainable. CWS unequivocally distances itself from any form of canned lion hunting.

As a result their marketing activities target the discerning American arena through Safari Club International and Dallas Safari Club, where hunters are more readily prepared to put in the time and work required to hunt under the free-range umbrella.

Once a client has expressed their commitment to hunting a lion with CWS, Mr. Walker researches options based on the clients requirements and secures a tag through a recognized concessioner in a suitable area. CWS has focused efforts in both Tanzania and Zimbabwe as prime lion countries – but with the implementation of age restrictions for lions and tightening of quota allocation and regulation in 2013 by the Zimbabwe Parks and Wildlife Management Authority, CWS has shifted the bulk of their operations to Zimbabwe.

CWS operates all but exclusively in areas where it is forbidden to hunt at night or use electronic devices to attract a predator. Hence, the legal use of bait to attract lions in conjunction with state of the art camera traps is employed to assess lions and their movements over the course of a safari.

- CWS sells all their lion hunts as 21 day safaris.

Over the past three years:

- On average, 9 bait sites with camera traps are established over the course of a safari.

- These cameras, together with spoor transects and actual sightings revealed an average of 29 independent lions noted. Of these an average of 7.86 were males of 2.5 years or older.
- CWS contracts an independent media company AAVideos to document, with video and SLR, sightings of lions on safari for analysis during and after the safari.
- In the past 3 years CWS has conducted 14 lion hunts – harvesting 13 lions, with an average estimated age of 5.73 years. One lion in 2013 was adjudged to be 4.5 years old – the remaining 12 passed the 5 year criteria enforced since January 2013 as suggested by Panthera Leo.
- 12 of the 14 clients were U.S. Citizens.
- Of these safaris 11 were conducted in Zimbabwe.
- Mr. Walker guided all of these personally - making him the most successful free-range lion hunter in Zimbabwe for 3 years running.
- Average cost to client over the past 3 years on a CWS lion hunt is \$107500.
- Between 14 and 20 staff are employed, housed and fed for the month of the CWS safari in the respective concessions used by CWS. An unofficial estimate of Zimbabwe's unemployment rate sitting at 90%, would suggest that a total of between 140 and 200 adults are supported for the month of each safari as well as their dependent children.
- Between 2 and 5 water sources are maintained and operated for a month with the income from 1 CWS lion safari.
-

II. ANTI POACHING EFFORTS

Areas under third party management

a) Because CWS does not have leases for the majority of concessions they are active in, official anti-poaching efforts lie with their respective concessioners and ZNPWA regional entities.

However extensive coverage of areas by vehicle and on foot, and investment by CWS in Satellite phones; 2 way and VHF radios, position Mr. Walker to observe, identify and report poaching activity for the duration of all CWS safaris, in his personal capacity.

- All Safari Areas in Zimbabwe require a ZPWMA representative to accompany and observe a safari.
- Legally, as a professional hunter in Zimbabwe, Mr. Walker is in charge of the safari.
- Mr. Walker in this capacity is allowed (But not obliged) to halt the safari to react to a poaching incident provided he is accompanied by the ZPWMA representative.
- Mr. Walker has acted on this right, innumerable times over the years, to remove snares; free snared animals; report victims of poaching; investigate suspicious gunfire and track armed poaching gangs. Two such reactions to poaching gang activity resulted in the shooting of ivory poachers, and several others in the recovery of boats, supplies, weapons and ivory caches.

Rifa Safari Area (Part of the greater Hurungwe Safari Area)

b) CWS has a 50% interest in the Rifa Safari Area lease, in Zimbabwe's Lower Zambezi Valley. Together with CWS' partner(Pro Safaris), CWS funds and coordinates anti-poaching efforts in the 125000 Acre interior of Rifa as well as the 40 km of the Zambezi river that designates the international boundary with Zambia and Zimbabwe, and forms Rifa's northern boundary.

"For the first time in 18 years, I do not have an American client pre-booked for future years (2017 on). Cancelations by American clients, previously booked on lion hunts in Rifa, have drastically diminished our potential to effectively counter poaching and maintain ecological stability through water management. " – Mr. Walker

Cliff Walker
Operating as Cliff Walker Safaris

	2013					2014					2015					Total	Average
	Duration of hunt	28	21	21	21	21	21	21	21	21	21	21	21	21	21	255	21.71
1	Nationality of client	US	US	US	US	US	US	US	US	US	US	US	US	US	US		
2	Country	Zw	Zw	Zw	Zw	Zw	Zw	Zw	Zw	Zw	Zw	Zw	Zw	Zw	Zw		
3	Concession & approximate Area	Rifa 125KAcre	Rifa 125KAcre	TZ, Rungwa 460KAcre	TZ, Rungwa 460KAcre	TZ, Maswa 150KAcre	Rifa 125KAcre	Matetsi(1) 100KAcre	Matetsi(3) 90KAcre	Matetsi(3) 90KAcre	Rifa 125KAcre	Matetsi(5) 90KAcre	Matetsi(1) 100KAcre	Rifa 125KAcre	Save Villy 50KAcre		
4	Number sites with Camera	9	10	12	9	10	20	8	7	5	12	8	11	4	3	109	9.14
5	Percent of cameras activated	78	70	67	89	20	85	87	100	100	83	63	91	75	100		
6	Number of lions noted - camera, tracks & sightings	20	26	54	48	15	35	42	39	28	21	19	33	12	14	360	29.0
7	Number of males	6	7	10	11	3	13	10	9	9	8	7	8	4	5	97	7.86
8	Percentage of these male (Including sub-adults)	30	27	18	23	20	37	21	23	32	38	37	25	25	36		
9	Day on Safari Lion Harvested	11	15	10	10	22	21	10	7	8	12	4	15	9	4		11.29
10	Age of Lion Harvested (Panthera)	6	5	6	6	6	na	4.5	4.5	8	5	6	5	5	7.5	63.5	5.73
11	Approximate Cost of Hunt to client.	\$120,000	\$100,000	\$115,000	\$115,000	\$120,000	\$100,000	\$110,000	\$110,000	\$110,000	\$95,000	\$110,000	\$110,000	\$100,000	\$90,000	\$1,505,000	\$107,500

Notes:

- 1 Majority of Lion hunts are sold as 21 day hunts. Clients will occasionally leave the safari once all target species have been harvested. They are however still billed for the full 21 days.
- 3 Stabilisation of lion populations in Zim Safari areas negates the need to look elsewhere for quota for clients wishing to hunt with Cliff.
- 4 This is approximate area for the concession on permit. Non of the areas are fenced and therefor wildlife is truly free range.
- 5 Cliff has 10 camera traps at his disposal. Camera traps are moved if the site is deemed to be non productive to different territories.
- 6 Cliff has an in depth knowledge of the topography of the areas he is active in. Often 2 baits will be set up in relative proximity to each other to target one zone of activity. Invariably only one bait/Camera trap will be activated.
- 7 Numbers of lions noted is affected greatly by the time of year-lion sightings increase as visibility increases and water becomes more localised.
- 10 Lion aging as a regulatory control was established in Zimbabwe in 2013. This is monitored by Panthera Leo for the ZNPWA

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed African lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion trophy at the following address:

John J. Jackson, III
Regina Lennox
Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: jjw-no2@att.net
E: regina.lennox@conservationforce.org

Signed: Justin R. Hedgecock

Name: Justin R. Hedgecock

Date: 2-12-2016

RCVD APR 27 2016



(b) (6)

(b) (6)

(b) (6)

DATE March 28 2016

PAY TO THE ORDER OF U.S. Fish and Wildlife \$ 100.00
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MEMO Alvin-Lion Cities Application

John R. Velazquez

(b) (6)

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.

† JAMES G. WEEVER, PH.D.

† BART O'NEILL, PH.D.

Mr. Timothy Van Norman

Chief, Branch of Permits

U.S. Fish and Wildlife Service

5275 Leesburg Pike

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April 20, 2016

Dear Chief Van Norman:

Enclosed please find five applications for permits to import the sport-hunted trophies of African lion (*P. l. melanochaita*) from Zimbabwe. In evaluating these applications, please consider the enclosed information and the information previously submitted by Conservation Force, Bulye Valley Conservancy, Zimbabwe's Parks and Wildlife Management Authority, and others. An index of documents submitted by Conservation Force is enclosed with this letter.

This information demonstrates that Zimbabwe's hunting program enhances the survival of the lion in the wild for three main reasons: (1) the hunting program is well-managed scientifically-based, and sustainable; (2) Zimbabwe's lion management addresses the three primary threats to lion (e.g., loss of habitat and prey base, and human-lion conflict); and (3) U.S. hunter revenues are ploughed back into lion conservation and provide critical incentives for landholders to manage lion at high densities.

I. Zimbabwe's conservation hunting program is well-managed, sustainable, and science-based.

A. The hunting program is governed by an effectively and adaptively implemented "Conservation Strategy and Action Plan."

Lion in Zimbabwe are adaptively managed and hunted under the Conservation Strategy and Action Plan (Action Plan).¹ The Action Plan is the result of a participatory workshop involving lion scientists, NGOs, industry representatives, and other stakeholders.² Both the Action Plan's "Vision (Long-term objective)" and "Goal (Immediate objective or purpose)" incorporate the sustainable use of lion:

4.1 Vision (Long-term objective)

Lions conserved and managed sustainably for their aesthetic, cultural and ecological value, and the socio-economic development of Zimbabwe.

4.2 Goal (Immediate objective or purpose)

¹ Zimbabwe Parks and Wildlife Management Authority (PWMA), Conservation Strategy and Action Plan for the Lion (*Panthera leo*) in Zimbabwe (Action Plan).

² Action Plan, p. 6; PWMA, Conservation Status of the African Lion (*Panthera leo*) in Zimbabwe (Jan. 2015) (Non-Detriment Finding), p. 22.

To secure and where possible, restore as many viable lion populations as possible ... whilst mitigating their negative impact and enhancing the value for the benefit of people through sustainable use.³

The Action Plan identifies targets, outputs, and detailed activities to conserve the lion, and describes the roles and responsibilities of the stakeholders involved in lion management. Among the main targets are: to improve data collection and research; to increase community benefits; and to ensure licensed hunting is sustainable. These targets have been met.

Target	Achievement
To improve data collection and research	Current density and population estimates are available for ~70% of Zimbabwe's lion range ⁴ Long-standing research partnerships with Wild CRU (1999) and other scientists (2007) have been established ⁵
To increase community benefits	Increased benefits-sharing has been the norm since the 2007 revision of the CAMPFIRE Revenue Sharing Guidelines requiring that 55% of fees are to be deposited in producer ward accounts, and 41% of the fees are directed to Rural District Councils for infrastructure building and projects ⁶
To ensure licensed hunting is sustainable	In 2013/2014, Zimbabwe adopted or reconfirmed its best practices to ensure the sustainability of legal hunting ⁷

These efforts show how the Action Plan is being successfully implemented and its targets achieved, and that Zimbabwe is properly managing its lion population and sustainable use-based hunting program.⁸

B. Zimbabwe's lion hunting program was updated in 2013 to enhance its sustainability.

Since July 2013, Zimbabwe's lion hunting regulations have been updated to ensure sustainability and the adoption of best practices, an "internal reform ... that is actively participated in and supported by all of the relevant stakeholders," including the Zimbabwe Parks and Wildlife Management Authority (PWMA), non-governmental organizations, professional hunters and safari operators, CAMPFIRE districts, and scientists and researchers.⁹ These updates included the adoption of an age-based approach to lion hunting and the

³ Action Plan, p. 9.

⁴ Non-Detriment Finding, p. 8-10; Dr. B. du Preez, Dr. R. Groom, O. Mufute, R. Mandisodza-Chikerema, Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion (*Panthera leo*) Conservation in Zimbabwe (Jan. 31, 2016) (Zimbabwe Lion Conservation Report 2016), p. 5-7.

⁵ Dr. B. du Preez, Buby Valley Conservancy Lion Research Report (Jan. 12, 2016) (BVC Report), p. 5-6; Zimbabwe Lion Conservation Report 2016, p. 4, 13, 21. The team of researchers at Buby Valley Conservancy is large and impressive, and includes an orphaned rhino manager. See www.bubyvalleyconservancy.com/team.

⁶ CAMPFIRE Association, Hunting in CAMPFIRE Areas (2014).

⁷ L. Muller, Chair, Zimbabwe Professional Hunters & Guides Association, Letter re: Lion Import Suspension (ZPHGA Letter) (Jan. 20, 2016), p. 1.

⁸ Some management units have their own plans. For example, in 2011 Savé Valley Conservancy commissioned a lion management plan "to provide members with a science-based plan to help them ethically and sustainably manage their lion population," and which "specifically advocates the use of hunting as a conservation management tool. It demonstrates willingness by the conservancy to guide their lion management based on science and advice from professionals." Dr. R. Groom, Hunting in Zimbabwe's Savé Valley Conservancy (Jan. 27, 2013) (SVC Report), p. 4.

⁹ Zimbabwe Lion Conservation Report 2016, p. 5.

imposition of penalties for harvest of lions younger than five;¹⁰ revision of the annual quotas and use of an adaptive quota-setting approach based on results of the lion aging approach; the removal of female lions from hunting quotas; and the termination of fixed quotas.¹¹

These updates are being effectively implemented. The lion aging is conducted by PWMA and overseen by the non-profit Panthera. Operators and PHs immediately adopted the age-based approach. One year after its adoption, harvest of underage lion represented only 20% of total offtakes.¹² This approach is allowing male lions to mature and increasing the numbers of older males.¹³ Zimbabwe's sport-hunting program for lion is sustainable, and the benefits outweigh the limited offtake.

C. Using the best-available information Zimbabwe's Scientific Authority concluded that hunting is not detrimental to the survival of the lion.

Zimbabwe's lion hunting is permitted subject to a Non-Detriment Finding made in January 2015.¹⁴ In this finding, PWMA, the CITES scientific authority, concluded:

The species contributes positively to the livelihoods of local communities through sport hunting. Hunting also contributes to the conservation of lions through financial benefits that are ploughed back into conservation and that local communities use for rural development programmes. Trophy hunting of the lion is undertaken through a strict scientific based quota setting process with an objective of ensuring that utilization and any form of harvesting is sustainable.

The African lion population is increasing in most areas. Research and monitoring of the species is being done collaboratively with external researchers and there is a lot of baseline information and publications. Zimbabwe has a lion management plan and strategy that is being implemented and reviewed on a regular basis. Rigorous monitoring of trophy hunting through adaptive management principles is carried out in Zimbabwe and non-detrimental findings are conducted for all exports. *In conclusion, harvesting and any other forms of off take are not detrimental to the survival of the African lion in Zimbabwe.*¹⁵

PWMA based its finding on current estimates from primary lion range areas, reflecting a lion population of at least 2,346.¹⁶ But that did not even include updated estimates from Bubye Valley Conservancy (BVC) and Savé Valley Conservancy (SVC), which increase the 2016 estimate to approximately 2,600 lions.¹⁷ Both

¹⁰ PWMA, Age Restrictions on Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe (2014).

¹¹ *Zimbabwe Lion Conservation Report 2016*, p. 24; ZPHGA Letter, p. 1-3. Other steps taken include the creation of an Ethics Committee, currently charged with updating the Code of Conduct and "best practices" manual for Zimbabwe's operators and professional hunters. Dr. C. Masterson (Ed.), Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe, Ethics and Coordination Committee for Ethical and Substantial Safari Hunting in Zimbabwe (Apr. 12, 2016) (*The Role of Hunting in Conservation and Livelihood Resilience*), p. 8, 16.

¹² ZPHGA Letter, p 4; see also L. Muller, Rifa Safari Area/Pro Safaris Africa, Report on Lion *Panthera Leo* (Jan. 25, 2016) (*Pro Safaris Report*), p. 2.

¹³ E.g., *Pro Safaris Report*, p. 2.

¹⁴ *Non-Detriment Finding*, p. 1.

¹⁵ *Id.* at 1 (added emphasis).

¹⁶ *Id.* at 11.

¹⁷ The current population estimate for Zimbabwe's major lion areas is approximately 2,600 individuals [Hwange-Matetsi Complex: 750, South Eastern Lowveld: 350, Gonarezhou National Park: 60, Malilangwe: 37, Savé Valley Conservancy: 284, Bubye Valley Conservancy: 500, Mid-Zambezi Valley

populations grew from reintroduced lion and have skyrocketed since the introductions.¹⁸ Populations in Hwange and Gonarezhou National Parks have also increased since the late 2000s.¹⁹ The 2015 IUCN *Red List* assessment for African lion acknowledges this growth. It inferred population declines in many parts of the lion's continental range, but *not* in Zimbabwe. Rather, the *Red List* pointed to an overall *increase* in sample lion populations in Zimbabwe.²⁰

Based on this large population size, data from stakeholders (including hunting operators, who often track lion sightings in their areas),²¹ and aging returns from the 2014 season, PWMA scientists set a 2015 quota of 85 lions.²² This represents approximately 3.62% of the population, and it is well within the guideline of <5% for a sustainable offtake. This quota is carefully allocated based on the type of land use. On state-protected lands (i.e., the PWMA and Forestry Estates), a lower quota is allocated than on communal lands, as managed hunting is used to mitigate human-lion conflict in some communal areas.²³ Lion are extremely dense on private conservancies, and the quotas are allocated based on this density.²⁴

However, because of the age-based limitation on lawful lion trophies, actual offtake is far below the quota. In 2015, only 39 lions were harvested representing ~46% of the quota and only 1.5% of a population of

Complex: 600], though the actual number would be larger if there were data available for the countries [sic] minor lion areas that are yet to be surveyed] (ZPWMA 2015).

Zimbabwe Lion Conservation Report 2016, p. 6.

¹⁸ In BVC, 13 lions were reintroduced and four "broke in" in 1999. From those 17, the population has grown to ~280 in 2009, "when robust population surveys were initiated," to over 500 lions today. *BVC Report*, p. 3. In SVC, the lion was reintroduced, and that and other reintroductions have given the conservancy its strong wildlife base:

Trophy hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, re-stock game, and improve security, especially because of the significant numbers of black rhino now found there.

SVC Report, p. 2; see also *Zimbabwe Lion Conservation Report 2016*, p. 12-19.

¹⁹ Lion populations can increase in abundance rapidly and can "achieve exponential growth rates." *Zimbabwe Lion Conservation Report 2016*, p. 8. Regulated, managed sport-hunting does not affect growth rates. *Id.* To the contrary, as the Non-Detriment finding suggests, hunting is not a population control method; however, the "positive aspects of sport-hunting as a conservation tool include a focus on males and a low percentage off-takes; neither of which generally jeopardise populations and also suggest that hunting could play a role in population recovery." *Id.*; *Non-Detriment Finding*, p. 1.

²⁰ H. Bauer et al., *Panthera Leo*, The IUCN Red List of Threatened Species (2015), <http://dx.doi.org/10.2305/IUCN.UK.2015-4.RLTS.T15951A79929984.en> ("Table 3 ... shows the estimated Lion population size in 1993 and 2014 for each of the 47 sample subpopulations ... it can be seen that most countries had a declining trend ... with only four countries (India, Namibia, South Africa and Zimbabwe) seeing a growth trend ... The sample Lion population in five countries (Botswana, India, Namibia, South Africa, Zimbabwe) grew by an estimated 12%, whereas the Lion population in the remaining African range countries declined by an estimated 61% ...").

²¹ E.g., *Pro Safaris Report*, p. 1 (observed at least 68 lions in the Rifa SA as of August 2015: "Population estimates are done with daily game sighting reports by Professional Hunters and Game Scouts ... camera traps and spoor counts done during the season"; operator also monitors prey base including buffalo, kudu, eland, impala, zebra, hippo, etc. and keeps population counts based on sightings/tracking; in 2015 observed 1,829 impalas and 646 buffalo in area); Cliff Walker Safaris, *Enhancement Report (2016) (CWS Report)* (showing tracking of 360 lions over 14 hunts in three seasons, including 97 males).

²² *Zimbabwe Lion Conservation Report 2016*, p. 9.

²³ *Id.* at 18.

²⁴ E.g., *id.* (density for BVC is ~0.187 lions/km²) ("The success of the [BVC], in terms of both its hunted lion and non-hunted rhino populations, provides the incentive for other areas in the country to sustainably manage their wildlife resource...").

2,600 lions.²⁵ Because the offtake was lower, the precautionary 2016 quota has adaptively been set at 75 lions, representing only 2.9% of the population.²⁶

Although the biological impact of the offtake is minute, its financial impact is not. The estimated value of selling the full lion quota is \$6,800,000.²⁷ The value of daily fees for just the lion harvested is \$2,800,000.²⁸ Assuming an average land management cost of \$150 per km², sale of the lion quota can support 45,333 km² in habitat²⁹ – an area almost the PWMA Estate (~50,000 km²) and about the size of Kenya's national parks and national reserves (44,702 km²).³⁰

Based on the effective implementation of Zimbabwe's carefully crafted aging approach, the science-based and sustainable quota, the limited offtake, and the "benefits that are ploughed back into conservation and that local communities use for rural development programmes," Zimbabwe's Scientific Authority properly concluded there is "no net harm" from the limited, regulated offtake, the net benefits of hunting greatly outweigh the limited offtake, and it is not detrimental to the species' survival. The critical role of regulated and sustainable hunting is evident in the fact that "Safari hunting demonstrably remains the single largest source of funding for wildlife-based land use and Community Based Natural Resource Management (CBNRM) in Zimbabwe – providing financial incentive to conserve."³¹

II. Zimbabwe's lion hunting and conservation program sufficiently address the three main threats to lion.

A. Sport-hunting in Zimbabwe extends the available protected lion range and incentivizes the use of communal and private land as habitat.

Protected areas in Zimbabwe cover more than 100,000 km² and include national parks, safari areas, private conservancies, and CAMPFIRE.³² National parks cover about 27,000 km², but hunting areas exceed 76,000 km² (including approximately 19,000 km² in safari areas; ~7,000 in conservancies, and 48,000 in CAMPFIRE areas).³³ "Hunting remains by far the highest earner of revenue sustaining biodiversity conservation and wildlife-based land use in Zimbabwe – be it under communal, private or state tenure. Hunting revenues not only incentivise and pay for wildlife as a primary land-use option on private and communal land, but

²⁵ *Id.* at 9.

²⁶ *Id.* In sum: Zimbabwe's quotas are based on scientific population density information, determined by experts and adaptively managed in accordance with the aging restrictions, and allocated by area according to density. The age-based approach and maximum quota conform to the best available scientific information and best practices as the FWS identified in the Final Rule.

²⁷ Assuming an average safari cost of \$80,000 is low. *Zimbabwe Lion Conservation Report 2016*, p. 22; *CWS Report* (average cost of \$107,000).

²⁸ *Id.*

²⁹ *Id.*

³⁰ PWMA, Website, www.zimparks.org/index.php/about-us/profile; IUCN/UN, 2014 United Nations List of Protected Areas, <http://blog.protectedplanet.net/post/102481051829/2014-united-nations-list-of-protected-areas>.

³¹ *The Role of Hunting in Conservation and Livelihood Resilience*, p. 1, 7.

³² This does not include the sizable forest reserves, many of which allow licensed safari hunting. See also *The Role of Hunting in Conservation and Livelihood Resilience*, p. 1, 17-18.

³³ CAMPFIRE Association, *Hunting in CAMPFIRE Areas* (2014); IUCN/UN, 2014 United Nations List of Protected Areas, <http://blog.protectedplanet.net/post/102481051829/2014-united-nations-list-of-protected-areas>.

so too, in the face of ever mounting pressure for land, does it stave off political and social pressure to de-gazette protected areas (PA's) on state land."³⁴

The Community Areas Management Program for Indigenous Resources (CAMPFIRE) program "is premised on the conservation of wildlife and other natural resources as a livelihood option for rural communities in marginal areas of Zimbabwe."³⁵ CAMPFIRE provides habitat and anti-poaching protection for wildlife, and generates revenues for poor rural communities.³⁶ It benefits wildlife and people both. Through CAMPFIRE the revenues from hunting help to increase local tolerance and decrease human-lion-livestock conflict.³⁷ But for the revenues generated from lion hunting, it is unlike CAMPFIRE communities would be willing to tolerate lion at the levels they do.³⁸

As for private land, Conservation Force sent three previous reports describing the habitat supporting the large wildlife populations in BVC and SVC. "In fact, 3 of the last 10 IUCN Key 1 Populations of Black Rhino remaining in Africa are to be found on private hunting conservancies in Zimbabwe."³⁹ BVC and SVC (~6,800 km²) depend entirely on revenue from sport hunting to fund their operations.⁴⁰

Without sport-hunting, this habitat would likely return to cattle ranching, and large populations of wildlife would be lost. Likewise, without the incentives generated through hunting, much CAMPFIRE land would be lost as habitat. This is *not* conjecture. It is empirical fact, based on the limited and inconsistent demand for non-consumptive tourism in Zimbabwe.⁴¹

Both communal and private areas have tried and failed to attract sustainable photographic tourism, due to "a combination of intractable contributing factors – from the global recession and downturn in tourism to poor international perception and desirability of Zimbabwe as a tourist destination, compounded by a severely depressed local economy, decaying infrastructure and diminished road and air-travel access. The industry operates at well below 50% occupancy based on current beds available and there is not a single

³⁴ *The Role of Hunting in Conservation and Livelihood Resilience*, p. 2.

³⁵ CAMPFIRE Association, *Hunting in CAMPFIRE Areas* (2014).

³⁶ *Id.*; *The Role of Hunting in Conservation and Livelihood Resilience*, p. 2, 17.

³⁷ *Id.* (As of 2014, "CAMPFIRE generates on average US\$2 million in net income every year which is much lower than estimated potential earnings for the Program. Income generation is mostly through the lease of sport hunting rights to commercial safari operators, as well as sales of hides and ivory, tourism leases on communal land and other natural resources management activities. As an industry, safari hunting has proven to be robust both environmentally and economically and, although not unscathed, [has been] fairly resilient in the face of serious socio-political uncertainty ... Although human encroachment and poaching has affected some communal wildlife areas in recent years, the CAMPFIRE program at national level still protects an area of wild land in excess of 50,000km², roughly equivalent in extent to the Parks and Wildlife Estate (Table 1). There are over 200,000 households that actively participate in the Program in CAMPFIRE hunting areas. Revenue received by communities, though relatively small, is used to directly offset the costs of living with wildlife through employment of game scouts or resource monitors.").

³⁸ *Zimbabwe Lion Conservation Report 2016*, p. 14; *Non-Detriment Finding*, p. 6-7, 9.

³⁹ *The Role of Hunting in Conservation and Livelihood Resilience*, p. 3.

⁴⁰ *SVC Report*, p. 5-6; *BVC Report*; M. Schwartz, National Geographic Cat Watch (Feb. 25, 2016) ("remember that the BVC used to be a cattle-ranching area, and if wildlife becomes unviable, then there is no reason not to convert it back to a cattle ranching area again"). See also IUCN, *Briefing Paper: Informing Decisions on Trophy Hunting* (2016), p. 2, 5, 7, 12.

⁴¹ *The Role of Hunting in Conservation and Livelihood Resilience*, p. 24; *SVC Report*, p. 2-3 ("Sport hunting and trophy hunting became the only economically viable land use options and have remained the only tangible source of income to the landowners of the SVC. In the case of the Senuko Lodge, for example, the land reform program resulted in a 98% cancelation of the confirmed bookings.").

working example of a community-owned non-hunting tourism venture catering to international clientele in the country.”⁴² Given Zimbabwe’s poor economy it is difficult to see them trying again, as photo-tourists require greater infrastructure and accessibility than hunting tourists do.⁴³ Sport-hunting alone incentivizes the preservation of most habitat in Zimbabwe.⁴⁴ “In Zimbabwe, over 75% of all conservation land under private, community and state tenure is entirely dependent on safari hunting revenues...” (7.9 million ha).⁴⁵

Hunting also incentivizes and pays for *improvements* in wildlife habitat. For example, BVC and SVC spend significant revenue on water provision. A smaller operator, Pro Safaris spends 6% of its gross turnover on “conservation,” largely for “water points installation, pipeline maintenance, water pumping, and de-silting of water pans...”⁴⁶ Water holes are one of the ways safari operators routinely improve available habitat.⁴⁷

Without hunting wildlife exists only in national parks. By providing, securing, and improving habitat, sport-hunting provides enhancement for the lion.

B. Sport-hunting in Zimbabwe provides significant anti-poaching support to protect the lion’s prey base.

Hunting revenues underwrite much of the anti-poaching which allows the lion’s prey base to flourish, and which thereby allows lion populations to grow. For example:

- In 2015 BVC spent \$590,000 in funds generated exclusively from sport-hunting to employ scouts, purchase equipment, and cover anti-poaching.⁴⁸ BVC protects the world’s third largest population of black rhino and incurs significant anti-poaching expenses to keep them secure from poachers.⁴⁹
- On average, SVC spends \$546,000 annually on anti-poaching, including a large expenditure for the protection of their black rhino population (approximately \$200,000/year).⁵⁰ The funds are largely generated from sport-hunting and donations from clients.⁵¹
- The Dande Anti-Poaching Unit (DAPU) in the Zambezi Valley is among the most successful. They reduced elephant poaching in their concessions from 40 carcasses in 2010 to only three in 2015. DAPU supports 22 community scouts and 18 council scouts. In 2014, they picked up 2,375 snares,

⁴² *The Role of Hunting in Conservation and Livelihood Resilience*, p. 3.

⁴³ *Id.* at 24 (“By comparison to [photo]-tourism, safari hunting operates on much higher income per tourist with much lower tourist throughflow and total bed-nights and requires far less capital outlay for accommodation and hospitality infrastructure. Not only are these extremely important considerations in the context of the poor socio-economic and political climate for investment and tourism in Zimbabwe ... Public health scares such as Ebola, terrorism, political unrest and social disturbances have had demonstrably serious impact on tourism traffic to different parts of Africa and is especially true of non-consumptive ecotourism which is far more sensitive to such deterrents than is trophy hunting ...”). See also IUCN, Briefing Paper: Informing Decisions on Trophy Hunting (2016), p. 8.

⁴⁴ Sport hunting incentivizes the preservation of an area larger than Kenya’s national parks. CAMPFIRE areas alone represent almost 50,000 km², and Kenya’s NPs are only ~47,000. See IUCN/UN, 2014 United Nations List of Protected Areas, <http://blog.protectedplanet.net/post/102481051829/2014-united-nations-list-of-protected-areas>.

⁴⁵ *The Role of Hunting in Conservation and Livelihood Resilience*, p. 11-12, 17-18.

⁴⁶ *Pro Safaris Report*, p. 3.

⁴⁷ See, e.g., *CWS Report; Zimbabwe Lion Conservation Report 2016*, p. 18.

⁴⁸ *Zimbabwe Lion Conservation Report 2016*, p. 20 (this amount does not include incentives and rewards donated for these purposes).

⁴⁹ *BVC Report*, p. 5.

⁵⁰ *Id.* at p. 5.

⁵¹ *SVC Report*, p. 5-6; *Zimbabwe Lion Conservation Report 2016*, p. 20.

convicted 19 meat poachers, retrieved 22 weapons, and paid over \$9,000 in rewards.⁵² This unit is wholly funded by hunting operator Charlton McCallum Safaris, and the contributions of its safari clients.⁵³ By protecting the lion's prey base, DAPU is significantly supporting lion conservation.

- Pro Safaris in the Rifa Safari Area contributes 39% of their gross revenue to PWMA, which supports wildlife management and monitoring as well as PWMA anti-poaching rangers.⁵⁴ They spend 6% of their gross to fund their own anti-poaching unit of ten scouts. Their team coordinate with PWMA rangers to police the 40-km international border with Zambia and an area covering ~506 km² (close to the size of Redwood National and State Parks in California combined). Ivory poaching is a threat, and funds generated from hunting help protect the elephant and other prey in the area.⁵⁵
- In 2013-2014, the anti-poaching teams supported by Martin Pieters Safaris conducted 289 patrols, recovered 165+ snares (a total of 15,000+ since 2007), recovered five firearms and ammunition, recovered four pairs of tusks as well as poached fish and meat, and arrested 123 poachers.⁵⁶ This company spends more than \$40,000/year on anti-poaching in their concessions.⁵⁷
- Martin Pieters Safaris is also helping establish a communal conservancy in the Omay area that has two seven-man anti-poaching teams. They have been extensively trained in weapons, tactics, and offensive maneuvers with the operator's support. This unit has branched into Gokwe and other communal lands, and cooperates extensively with Police and community scouts. As of November, this unit arrested over 120 poachers and traffickers, many of whom were hardened, professional poachers whose removal significantly benefits the lion's prey base.⁵⁸
- In March, a safari operator father and son lost their lives in a tragic accident as they were waiting to assist an anti-poaching patrol.⁵⁹ They dedicated their funds, their time, and ultimately their lives to protecting wildlife. The commitment of hunting operators cannot be questioned. Their efforts are obviously enhancement for the lion and other species.

These are but a few examples of the essential support safari operators provide to maintain and increase the lion's prey base, addressing this threat and enhancing the survival of the lion in the wild.

⁵² DAPU, Year-End 2015 Report (Oct./Nov. 2015), p. 9-20; DAPU, End-of-Year Report (Oct.-Dec. 2015).

⁵³ *Id.* at 3, 19.

⁵⁴ *Pro Safaris Report*, p. 3.

⁵⁵ *Id.*; see also *CWS Report*.

⁵⁶ Martin Pieters Safaris, Sustainable Use Benefiting Communities, Blog (Nov. 18, 2015); Martin Pieters Safaris, Lion Data (2016) (*M.P. Report*), p. 9.

⁵⁷ Martin Pieters Safaris, Anti-Poaching ... Fighting Back (African Conservancies Anti-Poaching 2015), Blog (Jan. 26, 2016).

⁵⁸ *Id.*

⁵⁹ The Zambezi Society, Factual Report on the Tragic Deaths of Two Wildlife Conservation Volunteers in Mana Pools National Park (Mar. 14, 2016), <http://www.zamsoc.org/?p=2121>; see also The Zambezi Society, Update Letter (Apr. 2016) (offering memorial to these operators; also describing the operations of MAPP, an anti-poaching unit run by another hunting operator), <http://us10.campaign-archive1.com/?u=f4943277ce971cb1c9028d068&id=a10245916e&e=959ad7ac3f>.

C. Sustainable use through sport-hunting is essential to reducing human-wildlife conflicts and the success of Zimbabwe's community based conservation program.

Sustainable use, largely through sport-hunting, is a pillar of CAMPFIRE.⁶⁰ This is due to the basic principle that co-existence of wildlife and people is improved, and people are more tolerant of the negative effects of wildlife, if wildlife has value.⁶¹ For instance, lion "hunting contributes to the conservation of lions via the financial revenue generated [through CAMPFIRE], which is ploughed back into conservation of the resource and empowers local communities to invest in their own rural development programs."⁶²

Consistent with CAMPFIRE revenue-sharing guidelines, hunting operators in communal areas pay a large percentage of revenues and fee income to the communities. For example, in the Dande area one operator pays well over 40% of gross sales to CAMPFIRE wards and councils. When payments to the government are included, the company retains less than half its income.⁶³ Like many others in Zimbabwe, the company believes "People MUST get FAIR value for their game, or all is lost," "make[s] sure that all hunting proceeds are correctly channelled [sic] in to producer ward accounts," and operate with "[s]trong social responsibility i.e. we allocate \$67,000 per annum to District and Ward projects and we ensure there is transparency."⁶⁴

In the Omay area, Martin Pieters Safaris and its associates contribute over \$200,000 annually "straight to the producer communities for community developmental projects."⁶⁵ In 2013-2014 the communities used these funds for a range of projects, including but not limited to:

- Building or repairing five teachers' houses, ten classrooms/blocks, and four administrative offices;
- Building or obtaining school supplies including two blackboards;
- Rehabilitating three water pipelines or boreholes;
- Constructing feeder roads;
- Obtaining or repairing heavy equipment including one tractor;
- Helping the community obtain construction materials, build toilets, and use funds for traditional ceremonies.⁶⁶

These direct benefits increase tolerance, and thus increase numbers of wildlife, in an area of ~8,094 km².⁶⁷ "Communities receive direct benefit both financially and through various projects implemented by Martin Pieters Safaris such as clinics, schools, vehicles for anti-poaching and the employment of scouts."⁶⁸ These benefits arise in "a remote inhospitable concession that has no other land use model due to very erratic

⁶⁰ CAMPFIRE Association, *Hunting in CAMPFIRE Areas* (2015); CAMPFIRE Association, Website ("Vision: To see rural communities in Zimbabwe freed from the vagaries of poverty and enjoying the benefits of the sustainable use of their natural resources ..."); see also *M.P. Report*, p. 1; IUCN, *Briefing Paper: Informing Decisions on Trophy Hunting* (2016), p. 4-7.

⁶¹ *Zimbabwe Lion Conservation Report 2016*, p. 11; see also Chiefs, EU in Wildlife Talks, *The Herald* (Apr. 2, 2016), <http://www.herald.co.zw/chiefs-eu-in-wildlife-talks/>.

⁶² *Id.*

⁶³ DAPU, *Year End Report* (2015).

⁶⁴ *Id.* at p. 3

⁶⁵ *M.P. Report*, p. 1-7; Martin Pieters Safaris, *Sustainable Offtake Benefiting Communities*, Blog (Nov. 18, 2015).

⁶⁶ *Id.*

⁶⁷ *Id.*

⁶⁸ *Id.*

and low rainfalls, and abundance of mosquitos, tsetse flies and poor soils. The only benefit local people have, is to receive financial remuneration from hunting safari off take and employment.”⁶⁹

Outside of communal areas, hunting also generates benefits for rural Zimbabweans. Operators contribute to enhancing quality of life for those impacted by wildlife to incentivize tolerance and conservation. These contributions are made in cash, much-needed goods or services, and game meat.

For example, BVC’s community assistance projects include drilling and equipping eight boreholes, building a clinic and staff houses with electrification and running water, contributing sport uniforms and transport for the youth soccer program, and more. According to the Conservancy’s manager, “the identifiable costs of the clinic amount to just over \$178,000 but there are many other hidden costs involved.”⁷⁰

Over and above these contributions, BVC has contributed 1,600 kg of meat each month since July 2011 to a trust administered by local chiefs to provide protein for school and community events and allow for the sale of excess meat to fund community projects.⁷¹ Overall, BVC donates over 45 tons of meat annually to local communities.⁷²

Similarly, SVC supports nearby communities through cash, service, in-kind, and meat donations. In 2012, for example, the conservancies’ contributions topped \$100,000 and included provision of water, repair or construction of schools and clinics, payment of school fees, provision of computer equipment, and regular meat donations, among other things.⁷³ Game meat contributions are a key benefit for local people:

[SVC] recently entered into a mutually dependent agreement with the Chiefs representing communities surrounding ... The agreement links the communities to the natural resource utilisation that occurs through the business operation of the conservancy and opens up opportunities for local indigenous populations to share in wealth creation... The hunting tourism of the conservancy is currently the only form of income by which the surrounding communities can benefit. Revenues from lion hunting constitute a significant portion of inflow and thus an important part of the community benefits.⁷⁴

⁶⁹ *Id.* (“Every year several local villagers are killed or maimed by elephant, lion, buffalo, hippo and crocodile, they live in close proximity to these animals and only tolerate them because we as a hunting company give back to the community. It is very important for the protection of our wildlife in these remote areas that we continue to assist the RDC with anti-poaching continue to pay for the sustainable off take of a select quota, because if we do not, the locals will kill every animal, they will not tolerate wildlife disruptions to their families, be it through destruction of their crops on an annual basis, or the loss of their family members.”).

⁷⁰ B. Leatham (Mazunga Safaris), Email re: Community Assistance Program in BVC and attached spreadsheet (Jan. 20, 2016).

⁷¹ *Id.* Similarly, 1,000 kg of meat each (2,000 total) is donated to the Beit Bridge communities (since April 2014) and the Mwenezi communities (since Aug. 2013). *Id.*; *Zimbabwe Lion Conservation Report 2016*, p. 14-15; Conservation Imperative, *The Fate of the African Lion: Bubye Valley Conservancy* (Aug. 4, 2015) (*Fate of the African Lion Film*), <http://theconservationimperative.com/?p=112> (game meat donations are a “direct spinoff” of the hunting program, and help build strong relationships with local chiefs. Any poachers found in the area are taken to the chiefs’ courts and prosecuted there, and “asked to compensate for the value of the animals killed and the compensation goes back to the community kitty.” This is a powerful community engagement system that benefits the wildlife directly.

⁷² *Zimbabwe Lion Conservation Report 2016*, p. 12 (BVC’s “meat donation is worth over US\$100,000 per year, and the communities are free to decide how they use it.”).

⁷³ *Id.*

⁷⁴ *SVC Report*, p. 5.

Hunting operators are also employers in a tough economy.⁷⁵ A small operator can employ 14-20 people; a medium operator can employ 14 staff, ten scouts, six trackers, and three professional hunters;⁷⁶ and a large operator like BVC can employ 350-400 staff and thereby support approximately 2,000 people.⁷⁷

It should also be noted that hunting clients make substantial contributions to local communities. One lion hunter expects to contribute over \$7,500 in gratuities during his safari, a “blue bag” donation, and perhaps an additional cash donation to a community or conservation purpose.⁷⁸ This is but one example – voluntary donations also help cover the anti-poaching expenses of DAPU, BVC, and SVC, among other things, and in turn this provides employment for local trackers and scouts.

The importance of these benefits cannot be overstated, because human-lion conflict is arguably the prime threat to lion in Zimbabwe.⁷⁹ This is one hunter of many, but put together these gifts provide considerable extra revenue for the poor and marginalized in a poor country, and sustain expensive anti-poaching efforts to protect endangered species. Added to the revenue/fee sharing and voluntary contributions from safari operators, hunting demonstrably benefits people, which in turn enhances the lion’s survival.

III. Revenue from U.S. hunters is used for conservation and maintaining viable lion populations.

The revenue generated from U.S. clients contributes hugely to lion conservation and habitat protection in Zimbabwe.

BVC and SVC each rely *solely* on the income from hunting, especially lion hunting, to fund their operations. Their clientele is overwhelmingly American.⁸⁰ These conservancies represent ~6,400 km² of former cattle ranches that instead host large and sustainable rhino, antelope, cheetah, wild dog, and lion populations (among others).⁸¹ The hunting of lion pays for the conservation of these other species, and the inability to sell lion hunts in their largest market puts the habitat, the prey base, the lion and all these other species at risk due to lack of funding. As BVC’s anti-poaching manager explained in a video sent to the FWS:

The BVC is about 3,000 square km ... It derives its whole income from hunting operations ... *Without the hunting there would be basically no reason for this area to exist or it would be a cattle area.* Having this large unit of land set aside for wildlife has meant that endangered species like black and white rhinoceros thrive here. We’ve got important populations of cheetah, wild dog as well, brown hyena, pangolins. So under the umbrella of hunting, this whole habitat is benefiting a whole variety of other species that are not consumptively hunted but they are benefiting from this wildlife area. Without hunting we would be very

⁷⁵ Zimbabwe faces a 95% unemployment rate. CIA World Factbook, <https://www.cia.gov/library/publications/the-world-factbook/geos/zi.html>.

⁷⁶ *Pro Safaris Report*, p. 3 (19% of turnover goes to salaries and on average supports 165 people; because concession is not located near a community, operator donates game meat to PWMA rangers and scouts, to government for state functions, and to orphanage, for total of 6,137 kg annually (\$12,250 and 2% of their gross income)).

⁷⁷ *CWS Report; Fate of the African Lion Film*.

⁷⁸ J. Hedgecock Statement (attached to import permit application); J. Hedgecock, pers. comm. (2015-2016).

⁷⁹ *Zimbabwe Lion Conservation Report 2016*, p. 11. Note that in a three-year period, seven people were killed.

⁸⁰ U.S. citizens represent over 90% of BVC and SVC’s respective clientele. *Zimbabwe Lion Conservation Report 2016*, p. 23; *SVC Report*, p. 4.

⁸¹ *Zimbabwe Lion Conservation Report 2016*, p. 4.

hard put to justify keeping this big expensive land in its current land use. The conservancy covers all its own anti-poaching costs. It is quite an expensive operation.⁸²

Lion hunting generates an estimated 33.9% of BVC's annual gross revenue – one-third of the funds needed to keep: the conservancy open as prime habitat, the anti-poaching patrols on the ground, and the future of the lion, black rhino, wild dog, and other species secure.⁸³ This is undoubtedly enhancement.

Likewise, as SVC reports, a "ban on lion trophy imports into the US will effectively result in a collapse of the lion hunting industry in the Savé Valley Conservancy, where on average 90% of hunting clients are American (up to 98% for some properties) ... The loss of the [approx.] \$375,000 annual revenue will be catastrophic for the conservancy, inevitably resulting in less investment in security and other conservation measures."⁸⁴

In short, the revenue from U.S. hunters is critical because lion in conservancies eat hundreds of thousands of dollars in huntable prey per year. And if the lions do not generate revenue there will be no incentive to maintain their large populations.⁸⁵

On a smaller scale, high-quality operators like Cliff Walker and Pro Safaris, which together police the Rifa Safari Area, could not exist but for U.S. clients. Mr. Walker maintains high hunting and conservation ethics and targets U.S. clients because they share these values.⁸⁶ Almost all (86%) of his clients are U.S. citizens paying an average of \$107,500 each in fees, which are ploughed back into Rifa SA, salaries, anti-poaching, and PWMA anti-poaching.

Similarly, lions are a major contributor to Pro Safaris' conservation/operating budget, and U.S. citizens are the main source of Pro Safaris' clients (75% of their lion were harvested by U.S. citizens).⁸⁷ The operator estimates that its conservation funding would fall by 36% if lion hunting declined because of an import ban. "Rifa Safari area has a small quota on all species. Lion therefore is a major contributor to the conservation of Elephant and the habitat to all species ... the Loss of the US Hunters will have a major negative impact on the survival of the viability of this area as a wildlife area."⁸⁸

U.S. hunters are huge contributors to Zimbabwe's conservation hunting program: they are the force that keeps Zimbabwe's hunters in business and keeps most habitat, anti-poaching, and CAMPFIRE benefits in place. Their presence enhances the survival of the lion, and their absence will do the opposite.

Conclusion

On the whole, the U.S. market represented "70.4% of the total Zimbabwean lion sport-hunting industry" between 2005 and 2015,⁸⁹ and that may even be higher. This means at least \$7 out of every \$10 directed

⁸² *Fate of the African Lion Film*; see also *Zimbabwe Lion Conservation Report 2016*, p. 20 ("saturation of lions in wildlife areas on both state and private land is positive for their future conservation security ... It is also critical to incidentally conserved endangered species, such as both species of rhino on private wildlife conservancies in Zimbabwe ..., which benefit from the same resources and protection incentivized and provided by the revenue generated from hunting").

⁸³ *Zimbabwe Lion Conservation Report 2016*, p. 22.

⁸⁴ *SVC Report*, p. 4.

⁸⁵ *BVC Report*, p. 5-6.

⁸⁶ *CWS Report*.

⁸⁷ *Pro Safaris Report*, p. 4.

⁸⁸ *Id.*

⁸⁹ *Zimbabwe Lion Conservation Report 2016*, p. 23.

to habitat protection comes from U.S. citizens. \$7 of every \$10 directed to anti-poaching comes from U.S. citizens (and that amount is likely higher given the voluntarily donations often made by U.S. clients). And \$7 of every \$10 contributed to communities to reduce human-lion conflict comes from U.S. clients. The contributions of U.S. clients are enhancing the survival of the lion in Zimbabwe far more than anyone else.

The Final Rule identified three primary threats to lion: loss of habitat, loss of prey base, and human-lion conflict. As shown here, in the enclosed, and in the previously submitted documents, U.S. citizens are the greatest contributors to efforts that reduce or remediate these threats. Sport-hunting in Zimbabwe, and lion hunting specifically, provides a reason to preserve thousands of kilometers of habitat for lion and prey species. It is the primary funder of the anti-poaching units that maintain or increase the lion's prey base. Hunting revenues provide the main funding for Zimbabwe's CBNRM program and the main contributor of other benefits to Zimbabwe's rural communities.

Because it substantially reduces the threats and contributes to the growth of Zimbabwe's lion population, Zimbabwe's well-managed sport-hunting program enhances the lion's survival. Accordingly, the enclosed permit applications, and those previously submitted, should be approved and permits issued.

We believe this information and the information already in the FWS' possession satisfies the requirements of 50 C.F.R. § 17.40(r) for Zimbabwe. We ask that you consider all that information in evaluating these permit applications. We will also continue to submit information about the benefits generated by safari hunting as it becomes available.

Sincerely,

John J. Jackson, III
Regina Lennox



Enclosures:

- Application submitted on behalf of Phillip Glass to import a sport-hunted lion trophy to be hunted in Nyaminyami CAMPFIRE Area, Zimbabwe
- Application submitted on behalf of Timothy Haley to import a sport-hunted lion trophy to be hunted in Rifa Safari Area, Zimbabwe
- Application submitted on behalf of Justin Hedgecock to import a sport-hunted lion trophy to be hunted in Matetsi Safari Area, Zimbabwe
- Application submitted on behalf of Eric Rau to import a sport-hunted lion trophy to be hunted in NW Matabeleland, Zimbabwe
- Application submitted on behalf of Cooper Ribman to import a sport-hunted lion trophy to be hunted in Buby Valley Conservancy, Zimbabwe
- Index of Documents Enclosed and Submitted

ENHANCEMENT INFORMATION ON THE AFRICAN LION

ZIMBABWE

No.	Title	Sent to FWS
1	Zimbabwe Parks & Wildlife Management Authority, Conservation Status of the African Lion (<i>Panthera leo</i>) in Zimbabwe (January 2015)	1/11/16
2	Zimbabwe Parks & Wildlife Management Authority, Age Restrictions on Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe (2014)	1/11/16
3	Dr. Byron du Preez [Oxford], Buby Valley Conservancy Lion Research Report (Jan. 12, 2016)	1/12/16
4	Blondie Leathem (Mazunga Safaris), Email re: Community Assistance Program in BVC, attaching spreadsheet (Jan. 20, 2016)	1/26/16
5	L. Muller, Chair, Zimbabwe Professional Hunters & Guides Association, Letter re: Lion Import Suspension (Jan. 20, 2016)	1/26/16
6	Dr. Rosemary Groom, Lion Hunting in Zimbabwe's Save Valley Conservancy (Jan. 27, 2013)	1/26/16
7	Dr. Byron du Preez et al., Zimbabwe Lion Conservation Research Report 2016: Sport Hunting and Lion (<i>Panthera leo</i>) Conservation in Zimbabwe (Jan. 31, 2016)	2/1/16
8	Conservation Imperative, The Fate of the African Lion: Buby Valley Conservancy (Aug. 4, 2015)	2/24/16
9	Martin Pieters Safaris, "Lion Data" (2016)	4/20/16
10	Michael Schwartz, Culling to Conserve: A Hard Truth for Lion Conservation, National Geographic Cat Watch (Feb. 25, 2016)	4/20/16
11	Zimbabwe Parks & Wildlife Management Authority, Conservation Strategy and Action Plan for the Lion (<i>Panthera leo</i>) in Zimbabwe	4/20/16
12	CAMPFIRE Association, Hunting in CAMPFIRE Areas (2014)	4/20/16
13	CAMPFIRE Association, Update to Hunting in CAMPFIRE Areas (2015)	4/20/16
14	Dr. C. Masterson (Ed.), Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe, Ethics and Coordination Committee for Ethical and Substantial Safari Hunting in Zimbabwe (Apr. 12, 2016)	4/20/16
15	L. Muller, Rifa Safari Area/Pro Safaris Africa, Report on Lion Panthera Leo (Jan. 25, 2016)	4/20/16
16	Cliff Walker Safaris, Enhancement Report (2016)	4/20/16
17	IUCN, Briefing Paper: Informing Decisions on Trophy Hunting (2016)	4/20/16
18	DAPU, Year-End 2015 Report (Oct./Nov. 2015)	4/20/16
19	DAPU, End-of-Year Report (Oct.-Dec. 2015)	4/20/16
20	Martin Pieters Safaris, Sustainable Offtake Benefiting Communities, Blog (Nov. 18, 2015)	4/20/16
21	Martin Pieters Safaris, Anti-Poaching ... Fighting Back (African Conservancies Anti-Poaching 2015), Blog (Jan. 26, 2016)	4/20/16
22	Nengasha Safaris, Letter re: Enhancement (2016)	4/20/16

RCVD APR 27 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: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES Threatened-listed
(Appendix I of CITES and/or **ESA**) lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual					
1 a. Last name <i>Ribman</i>	1 b. First name <i>Cooper</i>	1 c. Middle name or initial (b) (6)	1 d. Suffix		
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions)		
6 a. Telephone number (b) (6)	6 b. Alternate telephone number	6 c. Fax number (b) (6)	6 d. E-mail address (b) (6)		

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution					
1 a. Name of business, agency, Tribe, or institution			1 b. Doing business as (dba)		
2. Tax identification no.		3. Description of business, agency, Tribe, or institution			
4 a. Principal officer Last name		4 b. Principal officer First name		4 c. Principal officer Middle name/ initial	4 d. Suffix
5. Principal officer title			6. Primary contact name		
7 a. Business telephone number	7 b. Alternate telephone number	7 c. Business fax number	7 d. Business e-mail address		

C. All applicants complete address information					
1 a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes) (b) (6)					
1 b. City <i>DALLAS</i>	1 c. State <i>TX</i>	1 d. Zip code/Postal code (b) (6)	1 e. County/Province (b) (6)	1 f. Country <i>USA</i>	
2 a. Mailing Address (include if different than physical address, include name of contact person if applicable) <i>Same</i>					
2 b. City	2 c. State	2 d. Zip code/Postal code	2 e. County/Province	2 f. Country	

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <i>140528389819</i> No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <i>Cooper Ribman</i> Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) <i>02-15-2016</i> Date of signature (mm/dd/yyyy)	

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (*Appendix 1 of CITES and/or ESA*)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least 90 days for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting, please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

P. l. melanochaita (African lion)

b. Sex (if known).

Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

ZIMBABWE - SUBYE VALLEY CONSERVANCY

b. Date wildlife is to be hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

All parts including skin, skull, teeth, and claws

3. **IF THE ANIMAL IS DEAD**, please enter the following:

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

N/A

b. Date wildlife was hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Trophy Consultants International
Business Name: 4 JOSIAH CHINTMAN ROAD
Address: BELOW
City: BULAWAYO
State/Province: ZIMBABWE
Country, Postal Code: ZIMBABWE

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information provided by Conservation Force, Bulye and Save Valley Conservancies, and Zimbabwe authorities. **CERTIFICATION STATEMENT** (original signature must be provided for either 6 or 7 below)

6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: Cooper Ribman Date: 02/15/2016

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your proposed activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

SAME

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

N/A

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

John J. Jackson, III or Regina Lennox of Conservation Force
504-837-1233, jjw-no2@att.net or regina.lennox@conservationforce.org

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have named, constituted and appointed John J. Jackson, III, Conservation Force, 3240 S. I-10 Service Rd. W., Suite 200, Metairie, Louisiana, 70001, telephone (504) 837-1233, FAX (504) 837-1145, jjw-no@att.net as my attorney and legal representative for all matters concerning my ~~big horn sheep~~ ^{African Lion} import permit application.

This authority is all inclusive, including, but not limited to permit filing, permit supplementation, reconsideration, administrative appeal and request for time delays or extensions.

I also request that John J. Jackson, III be copied with all correspondence, acknowledgements, notices and decisions concerning my permit during its processing and during any and all steps in its administrative reconsideration or appeal.

Cooper Ribman
SIGNATURE

Cooper Ribman
PRINTED NAME

02-15-2016
DATE

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DATE FEB 21, 2016



PAY TO U.S. FISH AND WILDLIFE SERVICE \$ 100⁰⁰
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One Hundred and ^{no} 100 DOLLARS

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TEXAS CAPITAL BANK
Dallas, Texas

MEMO Cooper Ribman's Lion Application

(b) (6)

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, Ph.D.

† JAMES CAFFEY, Ph.D.

† BART O'CARROLL, Ph.D.

Mr. Timothy Van Norman**Chief, Branch of Permits****U.S. Fish and Wildlife Service****5275 Leesburg Pike****Falls Church, Virginia 22041-3803****BOARD OF DIRECTORS:**

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April 20, 2016

Dear Chief Van Norman:

Enclosed please find five applications for permits to import the sport-hunted trophies of African lion (*P. l. melanochaita*) from Zimbabwe. In evaluating these applications, please consider the enclosed information and the information previously submitted by Conservation Force, Bulye Valley Conservancy, Zimbabwe's Parks and Wildlife Management Authority, and others. An index of documents submitted by Conservation Force is enclosed with this letter.

This information demonstrates that Zimbabwe's hunting program enhances the survival of the lion in the wild for three main reasons: (1) the hunting program is well-managed scientifically-based, and sustainable; (2) Zimbabwe's lion management addresses the three primary threats to lion (e.g., loss of habitat and prey base, and human-lion conflict); and (3) U.S. hunter revenues are ploughed back into lion conservation and provide critical incentives for landholders to manage lion at high densities.

I. Zimbabwe's conservation hunting program is well-managed, sustainable, and science-based.

A. The hunting program is governed by an effectively and adaptively implemented "Conservation Strategy and Action Plan."

Lion in Zimbabwe are adaptively managed and hunted under the Conservation Strategy and Action Plan (Action Plan).¹ The Action Plan is the result of a participatory workshop involving lion scientists, NGOs, industry representatives, and other stakeholders.² Both the Action Plan's "Vision (Long-term objective)" and "Goal (Immediate objective or purpose)" incorporate the sustainable use of lion:

4.1 Vision (Long-term objective)

Lions conserved and managed sustainably for their aesthetic, cultural and ecological value, and the socio-economic development of Zimbabwe.

4.2 Goal (Immediate objective or purpose)

¹ Zimbabwe Parks and Wildlife Management Authority (PWMA), Conservation Strategy and Action Plan for the Lion (*Panthera leo*) in Zimbabwe (Action Plan).

² Action Plan, p. 6; PWMA, Conservation Status of the African Lion (*Panthera leo*) in Zimbabwe (Jan. 2015) (Non-Detriment Finding), p. 22.

To secure and where possible, restore as many viable lion populations as possible ... whilst mitigating their negative impact and enhancing the value for the benefit of people through sustainable use.³

The Action Plan identifies targets, outputs, and detailed activities to conserve the lion, and describes the roles and responsibilities of the stakeholders involved in lion management. Among the main targets are: to improve data collection and research; to increase community benefits; and to ensure licensed hunting is sustainable. These targets have been met.

Target	Achievement
To improve data collection and research	Current density and population estimates are available for ~70% of Zimbabwe's lion range ⁴ Long-standing research partnerships with Wild CRU (1999) and other scientists (2007) have been established ⁵
To increase community benefits	Increased benefits-sharing has been the norm since the 2007 revision of the CAMPFIRE Revenue Sharing Guidelines requiring that 55% of fees are to be deposited in producer ward accounts, and 41% of the fees are directed to Rural District Councils for infrastructure building and projects ⁶
To ensure licensed hunting is sustainable	In 2013/2014, Zimbabwe adopted or reconfirmed its best practices to ensure the sustainability of legal hunting ⁷

These efforts show how the Action Plan is being successfully implemented and its targets achieved, and that Zimbabwe is properly managing its lion population and sustainable use-based hunting program.⁸

B. Zimbabwe's lion hunting program was updated in 2013 to enhance its sustainability.

Since July 2013, Zimbabwe's lion hunting regulations have been updated to ensure sustainability and the adoption of best practices, an "internal reform ... that is actively participated in and supported by all of the relevant stakeholders," including the Zimbabwe Parks and Wildlife Management Authority (PWMA), non-governmental organizations, professional hunters and safari operators, CAMPFIRE districts, and scientists and researchers.⁹ These updates included the adoption of an age-based approach to lion hunting and the

³ *Action Plan*, p. 9.

⁴ *Non-Detriment Finding*, p. 8-10; Dr. B. du Preez, Dr. R. Groom, O. Mufute, R. Mandisodza-Chikerema, Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion (*Panthera leo*) Conservation in Zimbabwe (Jan. 31, 2016) (*Zimbabwe Lion Conservation Report 2016*), p. 5-7.

⁵ Dr. B. du Preez, Buby Valley Conservancy Lion Research Report (Jan. 12, 2016) (*BVC Report*), p. 5-6; *Zimbabwe Lion Conservation Report 2016*, p. 4, 13, 21. The team of researchers at Buby Valley Conservancy is large and impressive, and includes an orphaned rhino manager. See www.bubyvalleyconservancy.com/team.

⁶ CAMPFIRE Association, *Hunting in CAMPFIRE Areas* (2014).

⁷ L. Muller, Chair, Zimbabwe Professional Hunters & Guides Association, Letter re: Lion Import Suspension (ZPHGA Letter) (Jan. 20, 2016), p. 1.

⁸ Some management units have their own plans. For example, In 2011 Savé Valley Conservancy commissioned a lion management plan "to provide members with a science-based plan to help them ethically and sustainably manage their lion population," and which "specifically advocates the use of hunting as a conservation management tool. It demonstrates willingness by the conservancy to guide their lion management based on science and advice from professionals." Dr. R. Groom, *Hunting in Zimbabwe's Savé Valley Conservancy* (Jan. 27, 2013) (*SVC Report*), p. 4.

⁹ *Zimbabwe Lion Conservation Report 2016*, p. 5.

imposition of penalties for harvest of lions younger than five;¹⁰ revision of the annual quotas and use of an adaptive quota-setting approach based on results of the lion aging approach; the removal of female lions from hunting quotas; and the termination of fixed quotas.¹¹

These updates are being effectively implemented. The lion aging is conducted by PWMA and overseen by the non-profit Panthera. Operators and PHs immediately adopted the age-based approach. One year after its adoption, harvest of underage lion represented only 20% of total offtakes.¹² This approach is allowing male lions to mature and increasing the numbers of older males.¹³ Zimbabwe's sport-hunting program for lion is sustainable, and the benefits outweigh the limited offtake.

C. Using the best-available information Zimbabwe's Scientific Authority concluded that hunting is not detrimental to the survival of the lion.

Zimbabwe's lion hunting is permitted subject to a Non-Detriment Finding made in January 2015.¹⁴ In this finding, PWMA, the CITES scientific authority, concluded:

The species contributes positively to the livelihoods of local communities through sport hunting. Hunting also contributes to the conservation of lions through financial benefits that are ploughed back into conservation and that local communities use for rural development programmes. Trophy hunting of the lion is undertaken through a strict scientific based quota setting process with an objective of ensuring that utilization and any form of harvesting is sustainable.

The African lion population is increasing in most areas. Research and monitoring of the species is being done collaboratively with external researchers and there is a lot of baseline information and publications. Zimbabwe has a lion management plan and strategy that is being implemented and reviewed on a regular basis. Rigorous monitoring of trophy hunting through adaptive management principles is carried out in Zimbabwe and non-detrimental findings are conducted for all exports. *In conclusion, harvesting and any other forms of off take are not detrimental to the survival of the African lion in Zimbabwe.*¹⁵

PWMA based its finding on current estimates from primary lion range areas, reflecting a lion population of at least 2,346.¹⁶ But that did not even include updated estimates from Bubye Valley Conservancy (BVC) and Savé Valley Conservancy (SVC), which increase the 2016 estimate to approximately 2,600 lions.¹⁷ Both

¹⁰ PWMA, *Age Restrictions on Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe* (2014).

¹¹ *Zimbabwe Lion Conservation Report 2016*, p. 24; ZPHGA Letter, p. 1-3. Other steps taken include the creation of an Ethics Committee, currently charged with updating the Code of Conduct and "best practices" manual for Zimbabwe's operators and professional hunters. Dr. C. Masterson (Ed.), *Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe*, Ethics and Coordination Committee for Ethical and Substantial Safari Hunting in Zimbabwe (Apr. 12, 2016) (*The Role of Hunting in Conservation and Livelihood Resilience*), p. 8, 16.

¹² ZPHGA Letter, p 4; *see also* L. Muller, *Rifa Safari Area/Pro Safaris Africa, Report on Lion Panthera Leo* (Jan. 25, 2016) (*Pro Safaris Report*), p. 2.

¹³ *E.g., Pro Safaris Report*, p. 2.

¹⁴ *Non-Detriment Finding*, p. 1.

¹⁵ *Id.* at 1 (added emphasis).

¹⁶ *Id.* at 11.

¹⁷ The current population estimate for Zimbabwe's major lion areas is approximately 2,600 individuals [Hwange-Matetsi Complex: 750, South Eastern Lowveld: 350, Gonarezhou National Park: 60, Malilangwe: 37, Savé Valley Conservancy: 284, Bubye Valley Conservancy: 500, Mid-Zambezi Valley

populations grew from reintroduced lion and have skyrocketed since the introductions.¹⁸ Populations in Hwange and Gonarezhou National Parks have also increased since the late 2000s.¹⁹ The 2015 IUCN *Red List* assessment for African lion acknowledges this growth. It inferred population declines in many parts of the lion's continental range, but *not* in Zimbabwe. Rather, the *Red List* pointed to an overall *increase* in sample lion populations in Zimbabwe.²⁰

Based on this large population size, data from stakeholders (including hunting operators, who often track lion sightings in their areas),²¹ and aging returns from the 2014 season, PWMA scientists set a 2015 quota of 85 lions.²² This represents approximately 3.62% of the population, and it is well within the guideline of <5% for a sustainable offtake. This quota is carefully allocated based on the type of land use. On state-protected lands (i.e., the PWMA and Forestry Estates), a lower quota is allocated than on communal lands, as managed hunting is used to mitigate human-lion conflict in some communal areas.²³ Lion are extremely dense on private conservancies, and the quotas are allocated based on this density.²⁴

However, because of the age-based limitation on lawful lion trophies, actual offtake is far below the quota. In 2015, only 39 lions were harvested representing ~46% of the quota and only 1.5% of a population of

Complex: 600], though the actual number would be larger if there were data available for the countries [sic] minor lion areas that are yet to be surveyed] (ZPWMA 2015).

Zimbabwe Lion Conservation Report 2016, p. 6.

¹⁸ In BVC, 13 lions were reintroduced and four "broke in" in 1999. From those 17, the population has grown to ~280 in 2009, "when robust population surveys were initiated," to over 500 lions today. *BVC Report*, p. 3. In SVC, the lion was reintroduced, and that and other reintroductions have given the conservancy its strong wildlife base:

Trophy hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, re-stock game, and improve security, especially because of the significant numbers of black rhino now found there.

SVC Report, p. 2; see also *Zimbabwe Lion Conservation Report 2016*, p. 12-19.

¹⁹ Lion populations can increase in abundance rapidly and can "achieve exponential growth rates." *Zimbabwe Lion Conservation Report 2016*, p. 8. Regulated, managed sport-hunting does not affect growth rates. *Id.* To the contrary, as the Non-Detriment finding suggests, hunting is not a population control method; however, the "positive aspects of sport-hunting as a conservation tool include a focus on males and a low percentage off-takes; neither of which generally jeopardise populations and also suggest that hunting could play a role in population recovery." *Id.*; *Non-Detriment Finding*, p. 1.

²⁰ H. Bauer et al., *Panthera Leo*, The IUCN Red List of Threatened Species (2015), <http://dx.doi.org/10.2305/IUCN.UK.2015-4.RLTS.T15951A79929984.en> ("Table 3 ... shows the estimated Lion population size in 1993 and 2014 for each of the 47 sample subpopulations ... It can be seen that most countries had a declining trend ... with only four countries (India, Namibia, South Africa and Zimbabwe) seeing a growth trend ... The sample Lion population in five countries (Botswana, India, Namibia, South Africa, Zimbabwe) grew by an estimated 12%, whereas the Lion population in the remaining African range countries declined by an estimated 61% ...").

²¹ E.g., *Pro Safaris Report*, p. 1 (observed at least 68 lions in the Rifa SA as of August 2015: "Population estimates are done with daily game sighting reports by Professional Hunters and Game Scouts ... camera traps and spoor counts done during the season"; operator also monitors prey base including buffalo, kudu, eland, impala, zebra, hippo, etc. and keeps population counts based on sightings/tracking; in 2015 observed 1,829 Impalas and 646 buffalo in area); Cliff Walker Safaris, *Enhancement Report (2016) (CWS Report)* (showing tracking of 360 lions over 14 hunts in three seasons, including 97 males).

²² *Zimbabwe Lion Conservation Report 2016*, p. 9.

²³ *Id.* at 18.

²⁴ E.g., *id.* (density for BVC is ~0.187 lions/km²) ("The success of the [BVC], in terms of both its hunted lion and non-hunted rhino populations, provides the incentive for other areas in the country to sustainably manage their wildlife resource...").

2,600 lions.²⁵ Because the offtake was lower, the precautionary 2016 quota has adaptively been set at 75 lions, representing only 2.9% of the population.²⁶

Although the biological impact of the offtake is minute, its financial impact is not. The estimated value of selling the full lion quota is \$6,800,000.²⁷ The value of daily fees for just the lion harvested is \$2,800,000.²⁸ Assuming an average land management cost of \$150 per km², sale of the lion quota can support 45,333 km² in habitat²⁹ – an area almost the PWMA Estate (~50,000 km²) and about the size of Kenya’s national parks and national reserves (44,702 km²).³⁰

Based on the effective implementation of Zimbabwe’s carefully crafted aging approach, the science-based and sustainable quota, the limited offtake, and the “benefits that are ploughed back into conservation and that local communities use for rural development programmes,” Zimbabwe’s Scientific Authority properly concluded there is “no net harm” from the limited, regulated offtake, the net benefits of hunting greatly outweigh the limited offtake, and it is not detrimental to the species’ survival. The critical role of regulated and sustainable hunting is evident in the fact that “Safari hunting demonstrably remains the single largest source of funding for wildlife-based land use and Community Based Natural Resource Management (CBNRM) in Zimbabwe – providing financial incentive to conserve.”³¹

II. Zimbabwe’s lion hunting and conservation program sufficiently address the three main threats to lion.

A. Sport-hunting in Zimbabwe extends the available protected lion range and incentivizes the use of communal and private land as habitat.

Protected areas in Zimbabwe cover more than 100,000 km² and include national parks, safari areas, private conservancies, and CAMPFIRE.³² National parks cover about 27,000 km², but hunting areas exceed 76,000 km² (including approximately 19,000 km² in safari areas; ~7,000 in conservancies, and 48,000 in CAMPFIRE areas).³³ “Hunting remains by far the highest earner of revenue sustaining biodiversity conservation and wildlife-based land use in Zimbabwe – be it under communal, private or state tenure. Hunting revenues not only incentivise and pay for wildlife as a primary land-use option on private and communal land, but

²⁵ *Id.* at 9.

²⁶ *Id.* In sum: Zimbabwe’s quotas are based on scientific population density information, determined by experts and adaptively managed in accordance with the aging restrictions, and allocated by area according to density. The age-based approach and maximum quota conform to the best available scientific information and best practices as the FWS identified in the Final Rule.

²⁷ Assuming an average safari cost of \$80,000 is low. *Zimbabwe Lion Conservation Report 2016*, p. 22; *CWS Report* (average cost of \$107,000).

²⁸ *Id.*

²⁹ *Id.*

³⁰ PWMA, Website, www.zimparks.org/index.php/about-us/profile; IUCN/UN, 2014 United Nations List of Protected Areas, <http://blog.protectedplanet.net/post/102481051829/2014-united-nations-list-of-protected-areas>.

³¹ *The Role of Hunting in Conservation and Livelihood Resilience*, p. 1, 7.

³² This does not include the sizable forest reserves, many of which allow licensed safari hunting. See also *The Role of Hunting in Conservation and Livelihood Resilience*, p. 1, 17-18.

³³ CAMPFIRE Association, *Hunting in CAMPFIRE Areas* (2014); IUCN/UN, 2014 United Nations List of Protected Areas, <http://blog.protectedplanet.net/post/102481051829/2014-united-nations-list-of-protected-areas>.

so too, in the face of ever mounting pressure for land, does it stave off political and social pressure to de-gazette protected areas (PA's) on state land."³⁴

The Community Areas Management Program for Indigenous Resources (CAMPFIRE) program "is premised on the conservation of wildlife and other natural resources as a livelihood option for rural communities in marginal areas of Zimbabwe."³⁵ CAMPFIRE provides habitat and anti-poaching protection for wildlife, and generates revenues for poor rural communities.³⁶ It benefits wildlife and people both. Through CAMPFIRE the revenues from hunting help to increase local tolerance and decrease human-lion-livestock conflict.³⁷ But for the revenues generated from lion hunting, it is unlike CAMPFIRE communities would be willing to tolerate lion at the levels they do.³⁸

As for private land, Conservation Force sent three previous reports describing the habitat supporting the large wildlife populations in BVC and SVC. "In fact, 3 of the last 10 IUCN Key 1 Populations of Black Rhino remaining in Africa are to be found on private hunting conservancies in Zimbabwe."³⁹ BVC and SVC (~6,800 km²) depend entirely on revenue from sport hunting to fund their operations.⁴⁰

Without sport-hunting, this habitat would likely return to cattle ranching, and large populations of wildlife would be lost. Likewise, without the incentives generated through hunting, much CAMPFIRE land would be lost as habitat. This is *not* conjecture. It is empirical fact, based on the limited and inconsistent demand for non-consumptive tourism in Zimbabwe.⁴¹

Both communal and private areas have tried and failed to attract sustainable photographic tourism, due to "a combination of intractable contributing factors – from the global recession and downturn in tourism to poor international perception and desirability of Zimbabwe as a tourist destination, compounded by a severely depressed local economy, decaying infrastructure and diminished road and air-travel access. The industry operates at well below 50% occupancy based on current beds available and there is not a single

³⁴ *The Role of Hunting in Conservation and Livelihood Resilience*, p. 2.

³⁵ CAMPFIRE Association, *Hunting in CAMPFIRE Areas* (2014).

³⁶ *Id.*; *The Role of Hunting in Conservation and Livelihood Resilience*, p. 2, 17.

³⁷ *Id.* (As of 2014, "CAMPFIRE generates on average US\$2 million in net income every year which is much lower than estimated potential earnings for the Program. Income generation is mostly through the lease of sport hunting rights to commercial safari operators, as well as sales of hides and ivory, tourism leases on communal land and other natural resources management activities. As an industry, safari hunting has proven to be robust both environmentally and economically and, although not unscathed, [has been] fairly resilient in the face of serious socio-political uncertainty ... Although human encroachment and poaching has affected some communal wildlife areas in recent years, the CAMPFIRE program at national level still protects an area of wild land in excess of 50,000km², roughly equivalent in extent to the Parks and Wildlife Estate (Table 1). There are over 200,000 households that actively participate in the Program in CAMPFIRE hunting areas. Revenue received by communities, though relatively small, is used to directly offset the costs of living with wildlife through employment of game scouts or resource monitors.").

³⁸ *Zimbabwe Lion Conservation Report 2016*, p. 14; *Non-Detriment Finding*, p. 6-7, 9.

³⁹ *The Role of Hunting in Conservation and Livelihood Resilience*, p. 3.

⁴⁰ *SVC Report*, p. 5-6; *BVC Report*; M. Schwartz, National Geographic Cat Watch (Feb. 25, 2016) ("remember that the BVC used to be a cattle-ranching area, and if wildlife becomes unviable, then there is no reason not to convert it back to a cattle ranching area again"). See also IUCN, *Briefing Paper: Informing Decisions on Trophy Hunting* (2016), p. 2, 5, 7, 12.

⁴¹ *The Role of Hunting in Conservation and Livelihood Resilience*, p. 24; *SVC Report*, p. 2-3 ("Sport hunting and trophy hunting became the only economically viable land use options and have remained the only tangible source of income to the landowners of the SVC. In the case of the Senuko Lodge, for example, the land reform program resulted in a 98% cancelation of the confirmed bookings.").

working example of a community-owned non-hunting tourism venture catering to international clientele in the country.”⁴² Given Zimbabwe’s poor economy it is difficult to see them trying again, as photo-tourists require greater infrastructure and accessibility than hunting tourists do.⁴³ Sport-hunting alone incentivizes the preservation of most habitat in Zimbabwe.⁴⁴ “In Zimbabwe, over 75% of all conservation land under private, community and state tenure is entirely dependent on safari hunting revenues...” (7.9 million ha).⁴⁵

Hunting also incentivizes and pays for *improvements* in wildlife habitat. For example, BVC and SVC spend significant revenue on water provision. A smaller operator, Pro Safaris spends 6% of its gross turnover on “conservation,” largely for “water points installation, pipeline maintenance, water pumping, and de-silting of water pans...”⁴⁶ Water holes are one of the ways safari operators routinely improve available habitat.⁴⁷

Without hunting wildlife exists only in national parks. By providing, securing, and improving habitat, sport-hunting provides enhancement for the lion.

B. Sport-hunting in Zimbabwe provides significant anti-poaching support to protect the lion’s prey base.

Hunting revenues underwrite much of the anti-poaching which allows the lion’s prey base to flourish, and which thereby allows lion populations to grow. For example:

- In 2015 BVC spent \$590,000 in funds generated exclusively from sport-hunting to employ scouts, purchase equipment, and cover anti-poaching.⁴⁸ BVC protects the world’s third largest population of black rhino and incurs significant anti-poaching expenses to keep them secure from poachers.⁴⁹
- On average, SVC spends \$546,000 annually on anti-poaching, including a large expenditure for the protection of their black rhino population (approximately \$200,000/year).⁵⁰ The funds are largely generated from sport-hunting and donations from clients.⁵¹
- The Dande Anti-Poaching Unit (DAPU) in the Zambezi Valley is among the most successful. They reduced elephant poaching in their concessions from 40 carcasses in 2010 to only three in 2015. DAPU supports 22 community scouts and 18 council scouts. In 2014, they picked up 2,375 snares,

⁴² *The Role of Hunting in Conservation and Livelihood Resilience*, p. 3.

⁴³ *Id.* at 24 (“By comparison to [photo]-tourism, safari hunting operates on much higher income per tourist with much lower tourist throughflow and total bed-nights and requires far less capital outlay for accommodation and hospitality infrastructure. Not only are these extremely important considerations in the context of the poor socio-economic and political climate for investment and tourism in Zimbabwe ... Public health scares such as Ebola, terrorism, political unrest and social disturbances have had demonstrably serious impact on tourism traffic to different parts of Africa and is especially true of non-consumptive ecotourism which is far more sensitive to such deterrents than is trophy hunting ...”). See also IUCN, Briefing Paper: Informing Decisions on Trophy Hunting (2016), p. 8.

⁴⁴ Sport hunting incentivizes the preservation of an area larger than Kenya’s national parks. CAMPFIRE areas alone represent almost 50,000 km², and Kenya’s NPs are only ~47,000. See IUCN/UN, 2014 United Nations List of Protected Areas, <http://blog.protectedplanet.net/post/102481051829/2014-united-nations-list-of-protected-areas>.

⁴⁵ *The Role of Hunting in Conservation and Livelihood Resilience*, p. 11-12, 17-18.

⁴⁶ *Pro Safaris Report*, p. 3.

⁴⁷ See, e.g., *CWS Report; Zimbabwe Lion Conservation Report 2016*, p. 18.

⁴⁸ *Zimbabwe Lion Conservation Report 2016*, p. 20 (this amount does not include incentives and rewards donated for these purposes).

⁴⁹ *BVC Report*, p. 5.

⁵⁰ *Id.* at p. 5.

⁵¹ *SVC Report*, p. 5-6; *Zimbabwe Lion Conservation Report 2016*, p. 20.

convicted 19 meat poachers, retrieved 22 weapons, and paid over \$9,000 in rewards.⁵² This unit is wholly funded by hunting operator Charlton McCallum Safaris, and the contributions of its safari clients.⁵³ By protecting the lion's prey base, DAPU is significantly supporting lion conservation.

- Pro Safaris in the Rifa Safari Area contributes 39% of their gross revenue to PWMA, which supports wildlife management and monitoring as well as PWMA anti-poaching rangers.⁵⁴ They spend 6% of their gross to fund their own anti-poaching unit of ten scouts. Their team coordinate with PWMA rangers to police the 40-km international border with Zambia and an area covering ~506 km² (close to the size of Redwood National and State Parks in California combined). Ivory poaching is a threat, and funds generated from hunting help protect the elephant and other prey in the area.⁵⁵
- In 2013-2014, the anti-poaching teams supported by Martin Pieters Safaris conducted 289 patrols, recovered 165+ snares (a total of 15,000+ since 2007), recovered five firearms and ammunition, recovered four pairs of tusks as well as poached fish and meat, and arrested 123 poachers.⁵⁶ This company spends more than \$40,000/year on anti-poaching in their concessions.⁵⁷
- Martin Pieters Safaris is also helping establish a communal conservancy in the Omay area that has two seven-man anti-poaching teams. They have been extensively trained in weapons, tactics, and offensive maneuvers with the operator's support. This unit has branched into Gokwe and other communal lands, and cooperates extensively with Police and community scouts. As of November, this unit arrested over 120 poachers and traffickers, many of whom were hardened, professional poachers whose removal significantly benefits the lion's prey base.⁵⁸
- In March, a safari operator father and son lost their lives in a tragic accident as they were waiting to assist an anti-poaching patrol.⁵⁹ They dedicated their funds, their time, and ultimately their lives to protecting wildlife. The commitment of hunting operators cannot be questioned. Their efforts are obviously enhancement for the lion and other species.

These are but a few examples of the essential support safari operators provide to maintain and increase the lion's prey base, addressing this threat and enhancing the survival of the lion in the wild.

⁵² DAPU, Year-End 2015 Report (Oct./Nov. 2015), p. 9-20; DAPU, End-of-Year Report (Oct.-Dec. 2015).

⁵³ *Id.* at 3, 19.

⁵⁴ *Pro Safaris Report*, p. 3.

⁵⁵ *Id.*; see also *CWS Report*.

⁵⁶ Martin Pieters Safaris, Sustainable Use Benefiting Communities, Blog (Nov. 18, 2015); Martin Pieters Safaris, Lion Data (2016) (*M.P. Report*), p. 9.

⁵⁷ Martin Pieters Safaris, Anti-Poaching ... Fighting Back (African Conservancies Anti-Poaching 2015), Blog (Jan. 26, 2016).

⁵⁸ *Id.*

⁵⁹ The Zambezi Society, Factual Report on the Tragic Deaths of Two Wildlife Conservation Volunteers in Mana Pools National Park (Mar. 14, 2016), <http://www.zamsoc.org/?p=2121>; see also The Zambezi Society, Update Letter (Apr. 2016) (offering memorial to these operators; also describing the operations of MAPP, an anti-poaching unit run by another hunting operator), <http://us10.campaign-archive1.com/?u=f4943277ce971cb1c9028d068&id=a10245916e&e=959ad7ac3f>.

C. Sustainable use through sport-hunting is essential to reducing human-wildlife conflicts and the success of Zimbabwe's community based conservation program.

Sustainable use, largely through sport-hunting, is a pillar of CAMPFIRE.⁶⁰ This is due to the basic principle that co-existence of wildlife and people is improved, and people are more tolerant of the negative effects of wildlife, if wildlife has value.⁶¹ For instance, lion "hunting contributes to the conservation of lions via the financial revenue generated [through CAMPFIRE], which is ploughed back into conservation of the resource and empowers local communities to invest in their own rural development programs."⁶²

Consistent with CAMPFIRE revenue-sharing guidelines, hunting operators in communal areas pay a large percentage of revenues and fee income to the communities. For example, in the Dande area one operator pays well over 40% of gross sales to CAMPFIRE wards and councils. When payments to the government are included, the company retains less than half its income.⁶³ Like many others in Zimbabwe, the company believes "People MUST get FAIR value for their game, or all is lost," "make[s] sure that all hunting proceeds are correctly channelled [sic] in to producer ward accounts," and operate with "[s]trong social responsibility i.e. we allocate \$67,000 per annum to District and Ward projects and we ensure there is transparency."⁶⁴

In the Omay area, Martin Pieters Safaris and its associates contribute over \$200,000 annually "straight to the producer communities for community developmental projects."⁶⁵ In 2013-2014 the communities used these funds for a range of projects, including but not limited to:

- Building or repairing five teachers' houses, ten classrooms/blocks, and four administrative offices;
- Building or obtaining school supplies including two blackboards;
- Rehabilitating three water pipelines or boreholes;
- Constructing feeder roads;
- Obtaining or repairing heavy equipment including one tractor;
- Helping the community obtain construction materials, build toilets, and use funds for traditional ceremonies.⁶⁶

These direct benefits increase tolerance, and thus increase numbers of wildlife, in an area of ~8,094 km².⁶⁷ "Communities receive direct benefit both financially and through various projects implemented by Martin Pieters Safaris such as clinics, schools, vehicles for anti-poaching and the employment of scouts."⁶⁸ These benefits arise in "a remote inhospitable concession that has no other land use model due to very erratic

⁶⁰ CAMPFIRE Association, *Hunting in CAMPFIRE Areas* (2015); CAMPFIRE Association, Website ("Vision: To see rural communities in Zimbabwe freed from the vagaries of poverty and enjoying the benefits of the sustainable use of their natural resources ..."); see also *M.P. Report*, p. 1; IUCN, *Briefing Paper: Informing Decisions on Trophy Hunting* (2016), p. 4-7.

⁶¹ *Zimbabwe Lion Conservation Report 2016*, p. 11; see also Chiefs, EU in Wildlife Talks, *The Herald* (Apr. 2, 2016), <http://www.herald.co.zw/chiefs-eu-in-wildlife-talks/>.

⁶² *Id.*

⁶³ DAPU, *Year End Report* (2015).

⁶⁴ *Id.* at p. 3

⁶⁵ *M.P. Report*, p. 1-7; Martin Pieters Safaris, *Sustainable Offtake Benefiting Communities*, Blog (Nov. 18, 2015).

⁶⁶ *Id.*

⁶⁷ *Id.*

⁶⁸ *Id.*

and low rainfalls, and abundance of mosquitos, tsetse flies and poor soils. The only benefit local people have, is to receive financial remuneration from hunting safari off take and employment.”⁶⁹

Outside of communal areas, hunting also generates benefits for rural Zimbabweans. Operators contribute to enhancing quality of life for those impacted by wildlife to incentivize tolerance and conservation. These contributions are made in cash, much-needed goods or services, and game meat.

For example, BVC’s community assistance projects include drilling and equipping eight boreholes, building a clinic and staff houses with electrification and running water, contributing sport uniforms and transport for the youth soccer program, and more. According to the Conservancy’s manager, “the identifiable costs of the clinic amount to just over \$178,000 but there are many other hidden costs involved.”⁷⁰

Over and above these contributions, BVC has contributed 1,600 kg of meat each month since July 2011 to a trust administered by local chiefs to provide protein for school and community events and allow for the sale of excess meat to fund community projects.⁷¹ Overall, BVC donates over 45 tons of meat annually to local communities.⁷²

Similarly, SVC supports nearby communities through cash, service, in-kind, and meat donations. In 2012, for example, the conservancies’ contributions topped \$100,000 and included provision of water, repair or construction of schools and clinics, payment of school fees, provision of computer equipment, and regular meat donations, among other things.⁷³ Game meat contributions are a key benefit for local people:

[SVC] recently entered into a mutually dependent agreement with the Chiefs representing communities surrounding ... The agreement links the communities to the natural resource utilisation that occurs through the business operation of the conservancy and opens up opportunities for local indigenous populations to share in wealth creation... The hunting tourism of the conservancy is currently the only form of income by which the surrounding communities can benefit. Revenues from lion hunting constitute a significant portion of inflow and thus an important part of the community benefits.⁷⁴

⁶⁹ *Id.* (“Every year several local villagers are killed or maimed by elephant, lion, buffalo, hippo and crocodile, they live in close proximity to these animals and only tolerate them because we as a hunting company give back to the community. It is very important for the protection of our wildlife in these remote areas that we continue to assist the RDC with anti-poaching continue to pay for the sustainable off take of a select quota, because if we do not, the locals will kill every animal, they will not tolerate wildlife disruptions to their families, be it through destruction of their crops on an annual basis, or the loss of their family members.”).

⁷⁰ B. Leathem (Mazunga Safaris), Email re: Community Assistance Program in BVC and attached spreadsheet (Jan. 20, 2016).

⁷¹ *Id.* Similarly, 1,000 kg of meat each (2,000 total) is donated to the Beit Bridge communities (since April 2014) and the Mwenezi communities (since Aug. 2013). *Id.*; *Zimbabwe Lion Conservation Report 2016*, p. 14-15; Conservation Imperative, *The Fate of the African Lion: Bulyebe Valley Conservancy* (Aug. 4, 2015) (*Fate of the African Lion Film*), <http://theconservationimperative.com/?p=112> (game meat donations are a “direct spinoff” of the hunting program, and help build strong relationships with local chiefs. Any poachers found in the area are taken to the chiefs’ courts and prosecuted there, and “asked to compensate for the value of the animals killed and the compensation goes back to the community kitty.” This is a powerful community engagement system that benefits the wildlife directly.

⁷² *Zimbabwe Lion Conservation Report 2016*, p. 12 (BVC’s “meat donation is worth over US\$100,000 per year, and the communities are free to decide how they use it.”).

⁷³ *Id.*

⁷⁴ *SVC Report*, p. 5.

Hunting operators are also employers in a tough economy.⁷⁵ A small operator can employ 14-20 people; a medium operator can employ 14 staff, ten scouts, six trackers, and three professional hunters;⁷⁶ and a large operator like BVC can employ 350-400 staff and thereby support approximately 2,000 people.⁷⁷

It should also be noted that hunting clients make substantial contributions to local communities. One lion hunter expects to contribute over \$7,500 in gratuities during his safari, a "blue bag" donation, and perhaps an additional cash donation to a community or conservation purpose.⁷⁸ This is but one example—voluntary donations also help cover the anti-poaching expenses of DAPU, BVC, and SVC, among other things, and in turn this provides employment for local trackers and scouts.

The importance of these benefits cannot be overstated, because human-lion conflict is arguably the prime threat to lion in Zimbabwe.⁷⁹ This is one hunter of many, but put together these gifts provide considerable extra revenue for the poor and marginalized in a poor country, and sustain expensive anti-poaching efforts to protect endangered species. Added to the revenue/fee sharing and voluntary contributions from safari operators, hunting demonstrably benefits people, which in turn enhances the lion's survival.

III. Revenue from U.S. hunters is used for conservation and maintaining viable lion populations.

The revenue generated from U.S. clients contributes hugely to lion conservation and habitat protection in Zimbabwe.

BVC and SVC each rely *solely* on the income from hunting, especially lion hunting, to fund their operations. Their clientele is overwhelmingly American.⁸⁰ These conservancies represent ~6,400 km² of former cattle ranches that instead host large and sustainable rhino, antelope, cheetah, wild dog, and lion populations (among others).⁸¹ The hunting of lion pays for the conservation of these other species, and the inability to sell lion hunts in their largest market puts the habitat, the prey base, the lion and all these other species at risk due to lack of funding. As BVC's anti-poaching manager explained in a video sent to the FWS:

The BVC is about 3,000 square km ... It derives its whole income from hunting operations ... *Without the hunting there would be basically no reason for this area to exist or it would be a cattle area.* Having this large unit of land set aside for wildlife has meant that endangered species like black and white rhinoceros thrive here. We've got important populations of cheetah, wild dog as well, brown hyena, pangolins. So under the umbrella of hunting, this whole habitat is benefiting a whole variety of other species that are not consumptively hunted but they are benefiting from this wildlife area. Without hunting we would be very

⁷⁵ Zimbabwe faces a 95% unemployment rate. CIA World Factbook, <https://www.cia.gov/library/publications/the-world-factbook/geos/zi.html>.

⁷⁶ *Pro Safaris Report*, p. 3 (19% of turnover goes to salaries and on average supports 165 people; because concession is not located near a community, operator donates game meat to PWMA rangers and scouts, to government for state functions, and to orphanage, for total of 6,137 kg annually (\$12,250 and 2% of their gross income)).

⁷⁷ *CWS Report; Fate of the African Lion Film*.

⁷⁸ J. Hedgecock Statement (attached to import permit application); J. Hedgecock, pers. comm. (2015-2016).

⁷⁹ *Zimbabwe Lion Conservation Report 2016*, p. 11. Note that in a three-year period, seven people were killed.

⁸⁰ U.S. citizens represent over 90% of BVC and SVC's respective clientele. *Zimbabwe Lion Conservation Report 2016*, p. 23; *SVC Report*, p. 4.

⁸¹ *Zimbabwe Lion Conservation Report 2016*, p. 4.

hard put to justify keeping this big expensive land in its current land use. The conservancy covers all its own anti-poaching costs. It is quite an expensive operation.⁸²

Lion hunting generates an estimated 33.9% of BVC's annual gross revenue – one-third of the funds needed to keep: the conservancy open as prime habitat, the anti-poaching patrols on the ground, and the future of the lion, black rhino, wild dog, and other species secure.⁸³ This is undoubtedly enhancement.

Likewise, as SVC reports, a "ban on lion trophy imports into the US will effectively result in a collapse of the lion hunting industry in the Savé Valley Conservancy, where on average 90% of hunting clients are American (up to 98% for some properties) ... The loss of the [approx.] \$375,000 annual revenue will be catastrophic for the conservancy, inevitably resulting in less investment in security and other conservation measures."⁸⁴

In short, the revenue from U.S. hunters is critical because lion in conservancies eat hundreds of thousands of dollars in huntable prey per year. And if the lions do not generate revenue there will be no incentive to maintain their large populations.⁸⁵

On a smaller scale, high-quality operators like Cliff Walker and Pro Safaris, which together police the Rifa Safari Area, could not exist but for U.S. clients. Mr. Walker maintains high hunting and conservation ethics and targets U.S. clients because they share these values.⁸⁶ Almost all (86%) of his clients are U.S. citizens paying an average of \$107,500 each in fees, which are ploughed back into Rifa SA, salaries, anti-poaching, and PWMA anti-poaching.

Similarly, lions are a major contributor to Pro Safaris' conservation/operating budget, and U.S. citizens are the main source of Pro Safaris' clients (75% of their lion were harvested by U.S. citizens).⁸⁷ The operator estimates that its conservation funding would fall by 36% if lion hunting declined because of an import ban. "Rifa Safari area has a small quota on all species. Lion therefore is a major contributor to the conservation of Elephant and the habitat to all species ... the Loss of the US Hunters will have a major negative impact on the survival of the viability of this area as a wildlife area."⁸⁸

U.S. hunters are huge contributors to Zimbabwe's conservation hunting program: they are the force that keeps Zimbabwe's hunters in business and keeps most habitat, anti-poaching, and CAMPFIRE benefits in place. Their presence enhances the survival of the lion, and their absence will do the opposite.

Conclusion

On the whole, the U.S. market represented "70.4% of the total Zimbabwean lion sport-hunting industry" between 2005 and 2015,⁸⁹ and that may even be higher. This means at least \$7 out of every \$10 directed

⁸² *Fate of the African Lion Film*; see also *Zimbabwe Lion Conservation Report 2016*, p. 20 ("saturation of lions in wildlife areas on both state and private land is positive for their future conservation security ... It is also critical to incidentally conserved endangered species, such as both species of rhino on private wildlife conservancies in Zimbabwe ..., which benefit from the same resources and protection incentivized and provided by the revenue generated from hunting").

⁸³ *Zimbabwe Lion Conservation Report 2016*, p. 22.

⁸⁴ *SVC Report*, p. 4.

⁸⁵ *BVC Report*, p. 5-6.

⁸⁶ *CWS Report*.

⁸⁷ *Pro Safaris Report*, p. 4.

⁸⁸ *Id.*

⁸⁹ *Zimbabwe Lion Conservation Report 2016*, p. 23.

to habitat protection comes from U.S. citizens. \$7 of every \$10 directed to anti-poaching comes from U.S. citizens (and that amount is likely higher given the voluntarily donations often made by U.S. clients). And \$7 of every \$10 contributed to communities to reduce human-lion conflict comes from U.S. clients. The contributions of U.S. clients are enhancing the survival of the lion in Zimbabwe far more than anyone else.

The Final Rule identified three primary threats to lion: loss of habitat, loss of prey base, and human-lion conflict. As shown here, in the enclosed, and in the previously submitted documents, U.S. citizens are the greatest contributors to efforts that reduce or remediate these threats. Sport-hunting in Zimbabwe, and lion hunting specifically, provides a reason to preserve thousands of kilometers of habitat for lion and prey species. It is the primary funder of the anti-poaching units that maintain or increase the lion's prey base. Hunting revenues provide the main funding for Zimbabwe's CBNRM program and the main contributor of other benefits to Zimbabwe's rural communities.

Because it substantially reduces the threats and contributes to the growth of Zimbabwe's lion population, Zimbabwe's well-managed sport-hunting program enhances the lion's survival. Accordingly, the enclosed permit applications, and those previously submitted, should be approved and permits issued.

We believe this information and the information already in the FWS' possession satisfies the requirements of 50 C.F.R. § 17.40(r) for Zimbabwe. We ask that you consider all that information in evaluating these permit applications. We will also continue to submit information about the benefits generated by safari hunting as it becomes available.

Sincerely,

John J. Jackson, III
Regina Lennox



Enclosures:

- Application submitted on behalf of Phillip Glass to import a sport-hunted lion trophy to be hunted in Nyaminyami CAMPFIRE Area, Zimbabwe
- Application submitted on behalf of Timothy Haley to import a sport-hunted lion trophy to be hunted in Rifa Safari Area, Zimbabwe
- Application submitted on behalf of Justin Hedgecock to import a sport-hunted lion trophy to be hunted in Matetsi Safari Area, Zimbabwe
- Application submitted on behalf of Eric Rau to import a sport-hunted lion trophy to be hunted in NW Matabeleland, Zimbabwe
- Application submitted on behalf of Cooper Ribman to import a sport-hunted lion trophy to be hunted in Buby Valley Conservancy, Zimbabwe
- Index of Documents Enclosed and Submitted

ENHANCEMENT INFORMATION ON THE AFRICAN LION

ZIMBABWE

No.	Title	Sent to FWS
1	Zimbabwe Parks & Wildlife Management Authority, Conservation Status of the African Lion (<i>Panthera leo</i>) in Zimbabwe (January 2015)	1/11/16
2	Zimbabwe Parks & Wildlife Management Authority, Age Restrictions on Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe (2014)	1/11/16
3	Dr. Byron du Preez [Oxford], Bulye Valley Conservancy Lion Research Report (Jan. 12, 2016)	1/12/16
4	Blondie Leatham (Mazunga Safaris), Email re: Community Assistance Program in BVC, attaching spreadsheet (Jan. 20, 2016)	1/26/16
5	L. Muller, Chair, Zimbabwe Professional Hunters & Guides Association, Letter re: Lion Import Suspension (Jan. 20, 2016)	1/26/16
6	Dr. Rosemary Groom, Lion Hunting in Zimbabwe's Save Valley Conservancy (Jan. 27, 2013)	1/26/16
7	Dr. Byron du Preez et al., Zimbabwe Lion Conservation Research Report 2016: Sport Hunting and Lion (<i>Panthera leo</i>) Conservation in Zimbabwe (Jan. 31, 2016)	2/1/16
8	Conservation Imperative, The Fate of the African Lion: Bulye Valley Conservancy (Aug. 4, 2015)	2/24/16
9	Martin Pieters Safaris, "Lion Data" (2016)	4/20/16
10	Michael Schwartz, Culling to Conserve: A Hard Truth for Lion Conservation, National Geographic Cat Watch (Feb. 25, 2016)	4/20/16
11	Zimbabwe Parks & Wildlife Management Authority, Conservation Strategy and Action Plan for the Lion (<i>Panthera leo</i>) in Zimbabwe	4/20/16
12	CAMPFIRE Association, Hunting in CAMPFIRE Areas (2014)	4/20/16
13	CAMPFIRE Association, Update to Hunting in CAMPFIRE Areas (2015)	4/20/16
14	Dr. C. Masterson (Ed.), Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe, Ethics and Coordination Committee for Ethical and Substantial Safari Hunting in Zimbabwe (Apr. 12, 2016)	4/20/16
15	L. Muller, Rifa Safari Area/Pro Safaris Africa, Report on Lion Panthera Leo (Jan. 25, 2016)	4/20/16
16	Cliff Walker Safaris, Enhancement Report (2016)	4/20/16
17	IUCN, Briefing Paper: Informing Decisions on Trophy Hunting (2016)	4/20/16
18	DAPU, Year-End 2015 Report (Oct./Nov. 2015)	4/20/16
19	DAPU, End-of-Year Report (Oct.-Dec. 2015)	4/20/16
20	Martin Pieters Safaris, Sustainable Offtake Benefiting Communities, Blog (Nov. 18, 2015)	4/20/16
21	Martin Pieters Safaris, Anti-Poaching ... Fighting Back (African Conservancies Anti-Poaching 2015), Blog (Jan. 26, 2016)	4/20/16
22	Nengasha Safaris, Letter re: Enhancement (2016)	4/20/16

RCVD APR 27 2016



Department of the Interior
U.S. Fish and Wildlife Service

OMH No. 1018-0093
Expires 03/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES Threatened-listed
(Appendix I of CITES and/or ESA) lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual				
1 a. Last name Rau		1 b. First name Eric		1 c. Middle name or initial (b) (6)
2. Date of birth (mm/dd/yyyy) (b) (6)		3. Social Security No. (b) (6)		4. Occupation (b) (6)
5. Affiliation/ Doing business as (see instructions) ---		6 a. Telephone number (b) (6)		
6 b. Alternate telephone number (b) (6)		6 c. Fax number (b) (6)		6 d. E-mail address (b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution				
1 a. Name of business, agency, Tribe, or institution		1 b. Doing business as (dba)		
2. Tax identification no.		3. Description of business, agency, Tribe, or institution		
4 a. Principal officer Last name		4 b. Principal officer First name		4 c. Principal officer Middle name/ initial
4 d. Suffix		5. Principal officer title		
6. Primary contact name		7 a. Business telephone number		
7 b. Alternate telephone number		7 c. Business fax number		7 d. Business e-mail address

C. All applicants complete address information				
1 a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes) (b) (6)				
1 b. City Union	1 c. State MD	1 d. Zip code/Postal code (b) (6)	1 e. Country/Province (b) (6)	1 f. Country US
2 a. Mailing Address (include if different than physical address, include name of contact person if applicable) Same				
2 b. City	2 c. State	2 d. Zip code/Postal code	2 e. Country/Province	2 f. Country

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue 13US09807B/9 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.	
Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) <i>Eric Rau</i>	
Date of signature (mm/dd/yyyy) 03/10/2016	

copie
attac

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (*Appendix I of CITES and/or ESA*)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least 90 days for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting, please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
- Scientific name (genus, species, and, if applicable, subspecies) and common name.
P. l. melanochaita (African lion)
 - Sex (if known).
Male
2. IF ANIMAL IS CURRENTLY LIVING IN THE WILD, please enter the following:
- Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
Zimbabwe Area: Deka Tail Safari
Region: Matabeleland North
City: Bulawayo
 - Date wildlife is to be hunted:
April 14 – May 2, 2016
 - Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
All parts including skin, skull, teeth, and claws
3. IF THE ANIMAL IS DEAD, please enter the following:
- Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
N/A
 - Date wildlife was hunted:
N/A

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

N/A

- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents].

N/A

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Paul Bennie
Business Name: Nengasha Safaris
Address: 36A Townsend Rd
Address: Suburbs
City: Bulawayo
State/Province:
Country, Postal Code: Zimbabwe

See letter copy fr
Nengasha Safaris

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information already provided by Conservation Force, Pete Fick/Bubye Valley Conservancy, and Zimbabwe authorities.
CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  Date: 03/10/2016

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2). Port of entry Houston, TX; Broker: Well Worldwide Energy Logistics, Houston, TX 77073 (281)606-2400 llilley@well-usa.cc
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):

As listed on pg 1

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

John J. Jackson, III or Regina Lennox of Conservation Force
504-837-1233, jjw-no2@att.net or regina.lennox@conservationforce.org

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.



36 A TOWNSEND ROAD, SUBURBS, BULAWAYO, ZIMBABWE
TEL: +263 9 231329, EMAIL: nengasha@gatorzw.co.uk



Nengasha Safaris has a 10 year lease on the Deka Tail Safari Area and is presently at the beginning of year 6. The area has a 56km boundary with Hwange National Park.

When we started our lease, we established a full time Anti-Poaching team together with improved water supplies and generally good conservation policies. Wildlife numbers have increased considerably since the start of our lease.

The above is all funded from hunting revenue. We have a very conservative Quota allocation in the area – including 10 Buffalo bulls, 2 Leopard, 5 Elephant, and the 1 Lion.

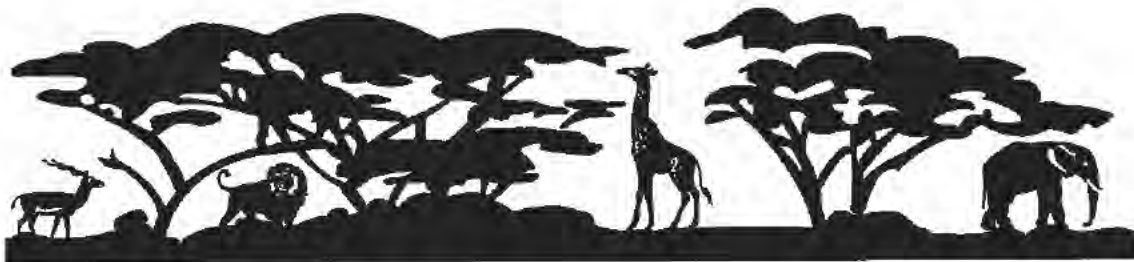
Therefore income from the Lion contributes considerably to conservation efforts in the area.

Data from each Lion shot including photos, skull measurements, and pre-molar teeth are submitted to National Parks and Wildlife Management Authority and the Panthera project.

Great care is taken to only harvest mature / old specimens. The trophy taken last year was aged between 10/11 years old.

I trust the above will assist you in considering this application in a positive light.

Paul Bennie
DIRECTOR



WELL WORLDWIDE ENERGY LOGISTICS, INC.

17401 Aldine Westfield Road
Houston, Texas 77073
281-606-2400 - phone
281-606-2435 - fax

DATE: 11/11/2015

ERIC (b) (6) RAU
(b) (6)

Union, MO (b) (6)

email: (b) (6)

Notify Party:
WELL Worldwide Energy Logistics, Inc.
Houston, TX 77073
Attn: Lynette Lilley
281-606-2400
email: llilley@well-usa.com

Port of Entry: Houston, TX (IAH)

Taxidermist:
Conroe Taxidermy
11845 Clark Lane
Conroe, TX 77385
281-367-2745
email: info@conroetaxidermy.com

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

Page 1 of 1
1. Original Permit/Certificate No.
13UB09807B/9
2. Valid
08/30/2014

(name and address, country)

(b) (6) RAU
(b) (6)
UNION, MO (b) (6)
U.S.A.

4. Consignee (name and address, country)
OUTBOUND EXPORTING
6 GRANTHAM ROAD
BULAWAYO, BELMONT
ZIMBABWE

5. Special Conditions

MUST COMPLY WITH ATTACHED GENERAL PERMIT CONDITIONS.

SPECIMEN MAY NOT BE SOLD OR TRANSFERRED FOR ANY FINANCIAL REMUNERATION.

U.S. THREATENED SPECIES (50 CFR 17.401)

MAY IMPORT THROUGH A DESIGNATED PORT LISTED IN CONDITION 10. PERMITTEE MAY
ONLY IMPORT TWO LEOPARD TROPHIES PER CALENDAR YEAR.

IF 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 EXPORT CERTIFICATE) MUST CONTAIN THE TAGGING INFORMATION AS OUTLINED
IN THE ATTACHED GENERAL PERMIT CONDITIONS.

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 in the case of air transport, with IATA Live
Animals Regulations.

6. Purpose of Importation

8. U.S. Management Authority

U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
4401 N. FAIRFAX DRIVE
ROOM 212
ARLINGTON, VA 22203-3247

07/01/2013

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

Common Name

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. F.W.

LEOPARD

Scientific Name

PANTHERA
PARDOUS

11. Quantity (including units)

12. Country of Origin

ZIMBABWE

Common Name

9.

10.

Scientific Name

9.

10.

Common Name

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Scientific Name

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Common Name

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Scientific Name

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Common Name

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Scientific Name

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Common Name

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10.

Scientific Name

9.

10.

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed African lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion trophy at the following address:

John J. Jackson, III
Regina Lennox
Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: jjw-no2@att.net
E: regina.lennox@conservationforce.org

Signed: _____



Name: _____

Eric E. Rau

Date: _____

03/10/2016

RCVD APR 27 2016

98076 The Stylos Check Company 1-800-724-2267 www.styloscheck.com

ERIC RAU
(b) (6)
UNION, MO (b) (6)

DATE 3/10/16

PAY TO THE ORDER OF U.S. Fish & Wildlife Serv \$100.00
One hundred DOLLARS

U. S. BANK
WASHINGTON, MO 63090

MEMO Application - report Eric Rau

(b) (6)

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, P.H.D.

† JAMES G. GREEN, P.H.D.

† BART O'CARROLL, P.H.D.

Mr. Timothy Van Norman**Chief, Branch of Permits****U.S. Fish and Wildlife Service****5275 Leesburg Pike****Falls Church, Virginia 22041-3803****BOARD OF DIRECTORS:**

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SHANE MAHONEY

DALE TOWELL, Ph.D.

April 20, 2016

Dear Chief Van Norman:

Enclosed please find five applications for permits to import the sport-hunted trophies of African lion (*P. l. melanochaita*) from Zimbabwe. In evaluating these applications, please consider the enclosed information and the information previously submitted by Conservation Force, Buby Valley Conservancy, Zimbabwe's Parks and Wildlife Management Authority, and others. An index of documents submitted by Conservation Force is enclosed with this letter.

This information demonstrates that Zimbabwe's hunting program enhances the survival of the lion in the wild for three main reasons: (1) the hunting program is well-managed scientifically-based, and sustainable; (2) Zimbabwe's lion management addresses the three primary threats to lion (e.g., loss of habitat and prey base, and human-lion conflict); and (3) U.S. hunter revenues are ploughed back into lion conservation and provide critical incentives for landholders to manage lion at high densities.

I. Zimbabwe's conservation hunting program is well-managed, sustainable, and science-based.

A. The hunting program is governed by an effectively and adaptively implemented "Conservation Strategy and Action Plan."

Lion in Zimbabwe are adaptively managed and hunted under the Conservation Strategy and Action Plan (Action Plan).¹ The Action Plan is the result of a participatory workshop involving lion scientists, NGOs, industry representatives, and other stakeholders.² Both the Action Plan's "Vision (Long-term objective)" and "Goal (Immediate objective or purpose)" incorporate the sustainable use of lion:

4.1 Vision (Long-term objective)

Lions conserved and managed sustainably for their aesthetic, cultural and ecological value, and the socio-economic development of Zimbabwe.

4.2 Goal (Immediate objective or purpose)

¹ Zimbabwe Parks and Wildlife Management Authority (PWMA), Conservation Strategy and Action Plan for the Lion (*Panthera leo*) in Zimbabwe (Action Plan).

² Action Plan, p. 6; PWMA, Conservation Status of the African Lion (*Panthera leo*) in Zimbabwe (Jan. 2015) (Non-Detriment Finding), p. 22.

*To secure and where possible, restore as many viable lion populations as possible ... whilst mitigating their negative impact and enhancing the value for the benefit of people through sustainable use.*³

The Action Plan identifies targets, outputs, and detailed activities to conserve the lion, and describes the roles and responsibilities of the stakeholders involved in lion management. Among the main targets are: to improve data collection and research; to increase community benefits; and to ensure licensed hunting is sustainable. These targets have been met.

Target	Achievement
To improve data collection and research	Current density and population estimates are available for ~70% of Zimbabwe's lion range ⁴ Long-standing research partnerships with Wild CRU (1999) and other scientists (2007) have been established ⁵
To increase community benefits	Increased benefits-sharing has been the norm since the 2007 revision of the CAMPFIRE Revenue Sharing Guidelines requiring that 55% of fees are to be deposited in producer ward accounts, and 41% of the fees are directed to Rural District Councils for infrastructure building and projects ⁶
To ensure licensed hunting is sustainable	In 2013/2014, Zimbabwe adopted or reconfirmed its best practices to ensure the sustainability of legal hunting ⁷

These efforts show how the Action Plan is being successfully implemented and its targets achieved, and that Zimbabwe is properly managing its lion population and sustainable use-based hunting program.⁸

B. Zimbabwe's lion hunting program was updated in 2013 to enhance its sustainability.

Since July 2013, Zimbabwe's lion hunting regulations have been updated to ensure sustainability and the adoption of best practices, an "internal reform ... that is actively participated in and supported by all of the relevant stakeholders," including the Zimbabwe Parks and Wildlife Management Authority (PWMA), non-governmental organizations, professional hunters and safari operators, CAMPFIRE districts, and scientists and researchers.⁹ These updates included the adoption of an age-based approach to lion hunting and the

³ *Action Plan*, p. 9.

⁴ *Non-Detriment Finding*, p. 8-10; Dr. B. du Preez, Dr. R. Groom, O. Mufute, R. Mandisodza-Chikerema, Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion (*Panthera leo*) Conservation in Zimbabwe (Jan. 31, 2016) (*Zimbabwe Lion Conservation Report 2016*), p. 5-7.

⁵ Dr. B. du Preez, Buby Valley Conservancy Lion Research Report (Jan. 12, 2016) (*BVC Report*), p. 5-6; *Zimbabwe Lion Conservation Report 2016*, p. 4, 13, 21. The team of researchers at Buby Valley Conservancy is large and impressive, and includes an orphaned rhino manager. See www.bubyvalleyconservancy.com/team.

⁶ CAMPFIRE Association, *Hunting in CAMPFIRE Areas* (2014).

⁷ L. Muller, Chair, Zimbabwe Professional Hunters & Guides Association, Letter re: Lion Import Suspension (ZPHGA Letter) (Jan. 20, 2016), p. 1.

⁸ Some management units have their own plans. For example, in 2011 Savé Valley Conservancy commissioned a lion management plan "to provide members with a science-based plan to help them ethically and sustainably manage their lion population," and which "specifically advocates the use of hunting as a conservation management tool. It demonstrates willingness by the conservancy to guide their lion management based on science and advice from professionals." Dr. R. Groom, *Hunting in Zimbabwe's Savé Valley Conservancy* (Jan. 27, 2013) (*SVC Report*), p. 4.

⁹ *Zimbabwe Lion Conservation Report 2016*, p. 5.

imposition of penalties for harvest of lions younger than five;¹⁰ revision of the annual quotas and use of an adaptive quota-setting approach based on results of the lion aging approach; the removal of female lions from hunting quotas; and the termination of fixed quotas.¹¹

These updates are being effectively implemented. The lion aging is conducted by PWMA and overseen by the non-profit Panthera. Operators and PHs immediately adopted the age-based approach. One year after its adoption, harvest of underage lion represented only 20% of total offtakes.¹² This approach is allowing male lions to mature and increasing the numbers of older males.¹³ Zimbabwe's sport-hunting program for lion is sustainable, and the benefits outweigh the limited offtake.

C. Using the best-available information Zimbabwe's Scientific Authority concluded that hunting is not detrimental to the survival of the lion.

Zimbabwe's lion hunting is permitted subject to a Non-Detriment Finding made in January 2015.¹⁴ In this finding, PWMA, the CITES scientific authority, concluded:

The species contributes positively to the livelihoods of local communities through sport hunting. Hunting also contributes to the conservation of lions through financial benefits that are ploughed back into conservation and that local communities use for rural development programmes. Trophy hunting of the lion is undertaken through a strict scientific based quota setting process with an objective of ensuring that utilization and any form of harvesting is sustainable.

The African lion population is increasing in most areas. Research and monitoring of the species is being done collaboratively with external researchers and there is a lot of baseline information and publications. Zimbabwe has a lion management plan and strategy that is being implemented and reviewed on a regular basis. Rigorous monitoring of trophy hunting through adaptive management principles is carried out in Zimbabwe and non-detrimental findings are conducted for all exports. *In conclusion, harvesting and any other forms of off take are not detrimental to the survival of the African lion in Zimbabwe.*¹⁵

PWMA based its finding on current estimates from primary lion range areas, reflecting a lion population of at least 2,346.¹⁶ But that did not even include updated estimates from Buby Valley Conservancy (BVC) and Savé Valley Conservancy (SVC), which increase the 2016 estimate to approximately 2,600 lions.¹⁷ Both

¹⁰ PWMA, Age Restrictions on Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe (2014).

¹¹ *Zimbabwe Lion Conservation Report 2016*, p. 24; ZPHGA Letter, p. 1-3. Other steps taken include the creation of an Ethics Committee, currently charged with updating the Code of Conduct and "best practices" manual for Zimbabwe's operators and professional hunters. Dr. C. Masterson (Ed.), Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe, Ethics and Coordination Committee for Ethical and Substantial Safari Hunting in Zimbabwe (Apr. 12, 2016) (*The Role of Hunting in Conservation and Livelihood Resilience*), p. 8, 16.

¹² ZPHGA Letter, p 4; see also L. Muller, Rifa Safari Area/Pro Safaris Africa, Report on Lion *Panthera Leo* (Jan. 25, 2016) (*Pro Safaris Report*), p. 2.

¹³ E.g., *Pro Safaris Report*, p. 2.

¹⁴ *Non-Detriment Finding*, p. 1.

¹⁵ *Id.* at 1 (added emphasis).

¹⁶ *Id.* at 11.

¹⁷ The current population estimate for Zimbabwe's major lion areas is approximately 2,600 individuals (Hwange-Matetsi Complex: 750, South Eastern Lowveld: 350, Gonarezhou National Park: 60, Malilangwe: 37, Savé Valley Conservancy: 284, Buby Valley Conservancy: 500, Mid-Zambezi Valley

populations grew from reintroduced lion and have skyrocketed since the introductions.¹⁸ Populations in Hwange and Gonarezhou National Parks have also increased since the late 2000s.¹⁹ The 2015 IUCN *Red List* assessment for African lion acknowledges this growth. It inferred population declines in many parts of the lion's continental range, but *not* in Zimbabwe. Rather, the *Red List* pointed to an overall *increase* in sample lion populations in Zimbabwe.²⁰

Based on this large population size, data from stakeholders (including hunting operators, who often track lion sightings in their areas),²¹ and aging returns from the 2014 season, PWMA scientists set a 2015 quota of 85 lions.²² This represents approximately 3.62% of the population, and it is well within the guideline of <5% for a sustainable offtake. This quota is carefully allocated based on the type of land use. On state-protected lands (i.e., the PWMA and Forestry Estates), a lower quota is allocated than on communal lands, as managed hunting is used to mitigate human-lion conflict in some communal areas.²³ Lion are extremely dense on private conservancies, and the quotas are allocated based on this density.²⁴

However, because of the age-based limitation on lawful lion trophies, actual offtake is far below the quota. In 2015, only 39 lions were harvested representing ~46% of the quota and only 1.5% of a population of

Complex: 600], though the actual number would be larger if there were data available for the countries [sic] minor lion areas that are yet to be surveyed] (ZPWMA 2015).

Zimbabwe Lion Conservation Report 2016, p. 6.

¹⁸ In BVC, 13 lions were reintroduced and four “broke in” in 1999. From those 17, the population has grown to ~280 in 2009, “when robust population surveys were initiated,” to over 500 lions today. *BVC Report*, p. 3. In SVC, the lion was reintroduced, and that and other reintroductions have given the conservancy its strong wildlife base:

Trophy hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, re-stock game, and improve security, especially because of the significant numbers of black rhino now found there.

SVC Report, p. 2; see also *Zimbabwe Lion Conservation Report 2016*, p. 12-19.

¹⁹ Lion populations can increase in abundance rapidly and can “achieve exponential growth rates.” *Zimbabwe Lion Conservation Report 2016*, p. 8. Regulated, managed sport-hunting does not affect growth rates. *Id.* To the contrary, as the Non-Detriment finding suggests, hunting is not a population control method; however, the “positive aspects of sport-hunting as a conservation tool include a focus on males and a low percentage off-takes; neither of which generally jeopardise populations and also suggest that hunting could play a role in population recovery.” *Id.*; *Non-Detriment Finding*, p. 1.

²⁰ H. Bauer et al., *Panthera Leo*, The IUCN Red List of Threatened Species (2015), <http://dx.doi.org/10.2305/IUCN.UK.2015-4.RLTS.T15951A79929984.en> (“Table 3 ... shows the estimated Lion population size in 1993 and 2014 for each of the 47 sample subpopulations ... It can be seen that most countries had a declining trend ... with only four countries (India, Namibia, South Africa and Zimbabwe) seeing a growth trend ... The sample Lion population in five countries (Botswana, India, Namibia, South Africa, Zimbabwe) grew by an estimated 12%, whereas the Lion population in the remaining African range countries declined by an estimated 61% ...”).

²¹ E.g., *Pro Safaris Report*, p. 1 (observed at least 68 lions in the Rifa SA as of August 2015: “Population estimates are done with daily game sighting reports by Professional Hunters and Game Scouts ... camera traps and spoor counts done during the season”; operator also monitors prey base including buffalo, kudu, eland, impala, zebra, hippo, etc. and keeps population counts based on sightings/tracking; in 2015 observed 1,829 impalas and 646 buffalo in area); Cliff Walker Safaris, *Enhancement Report (2016) (CWS Report)* (showing tracking of 360 lions over 14 hunts in three seasons, including 97 males).

²² *Zimbabwe Lion Conservation Report 2016*, p. 9.

²³ *Id.* at 18.

²⁴ E.g., *id.* (density for BVC is ~0.187 lions/km²) (“The success of the [BVC], in terms of both its hunted lion and non-hunted rhino populations, provides the incentive for other areas in the country to sustainably manage their wildlife resource...”).

2,600 lions.²⁵ Because the offtake was lower, the precautionary 2016 quota has adaptively been set at 75 lions, representing only 2.9% of the population.²⁶

Although the biological impact of the offtake is minute, its financial impact is not. The estimated value of selling the full lion quota is \$6,800,000.²⁷ The value of daily fees for just the lion harvested is \$2,800,000.²⁸ Assuming an average land management cost of \$150 per km², sale of the lion quota can support 45,333 km² in habitat²⁹ – an area almost the PWMA Estate (~50,000 km²) and about the size of Kenya’s national parks and national reserves (44,702 km²).³⁰

Based on the effective implementation of Zimbabwe’s carefully crafted aging approach, the science-based and sustainable quota, the limited offtake, and the “benefits that are ploughed back into conservation and that local communities use for rural development programmes,” Zimbabwe’s Scientific Authority properly concluded there is “no net harm” from the limited, regulated offtake, the net benefits of hunting greatly outweigh the limited offtake, and it is not detrimental to the species’ survival. The critical role of regulated and sustainable hunting is evident in the fact that “Safari hunting demonstrably remains the single largest source of funding for wildlife-based land use and Community Based Natural Resource Management (CBNRM) in Zimbabwe – providing financial incentive to conserve.”³¹

II. Zimbabwe’s lion hunting and conservation program sufficiently address the three main threats to lion.

A. Sport-hunting in Zimbabwe extends the available protected lion range and incentivizes the use of communal and private land as habitat.

Protected areas in Zimbabwe cover more than 100,000 km² and include national parks, safari areas, private conservancies, and CAMPFIRE.³² National parks cover about 27,000 km², but hunting areas exceed 76,000 km² (including approximately 19,000 km² in safari areas; ~7,000 in conservancies, and 48,000 in CAMPFIRE areas).³³ “Hunting remains by far the highest earner of revenue sustaining biodiversity conservation and wildlife-based land use in Zimbabwe – be it under communal, private or state tenure. Hunting revenues not only incentivise and pay for wildlife as a primary land-use option on private and communal land, but

²⁵ *Id.* at 9.

²⁶ *Id.* In sum: Zimbabwe’s quotas are based on scientific population density information, determined by experts and adaptively managed in accordance with the aging restrictions, and allocated by area according to density. The age-based approach and maximum quota conform to the best available scientific information and best practices as the FWS identified in the Final Rule.

²⁷ Assuming an average safari cost of \$80,000 is low. *Zimbabwe Lion Conservation Report 2016*, p. 22; *CWS Report* (average cost of \$107,000).

²⁸ *Id.*

²⁹ *Id.*

³⁰ PWMA, Website, www.zimparks.org/index.php/about-us/profile; IUCN/UN, 2014 United Nations List of Protected Areas, <http://blog.protectedplanet.net/post/102481051829/2014-united-nations-list-of-protected-areas>.

³¹ *The Role of Hunting in Conservation and Livelihood Resilience*, p. 1, 7.

³² This does not include the sizable forest reserves, many of which allow licensed safari hunting. *See also The Role of Hunting in Conservation and Livelihood Resilience*, p. 1, 17-18.

³³ CAMPFIRE Association, *Hunting in CAMPFIRE Areas* (2014); IUCN/UN, 2014 United Nations List of Protected Areas, <http://blog.protectedplanet.net/post/102481051829/2014-united-nations-list-of-protected-areas>.

so too, in the face of ever mounting pressure for land, does it stave off political and social pressure to de-gazette protected areas (PA's) on state land."³⁴

The Community Areas Management Program for Indigenous Resources (CAMPFIRE) program "is premised on the conservation of wildlife and other natural resources as a livelihood option for rural communities in marginal areas of Zimbabwe."³⁵ CAMPFIRE provides habitat and anti-poaching protection for wildlife, and generates revenues for poor rural communities.³⁶ It benefits wildlife and people both. Through CAMPFIRE the revenues from hunting help to increase local tolerance and decrease human-lion-livestock conflict.³⁷ But for the revenues generated from lion hunting, it is unlike CAMPFIRE communities would be willing to tolerate lion at the levels they do.³⁸

As for private land, Conservation Force sent three previous reports describing the habitat supporting the large wildlife populations in BVC and SVC. "In fact, 3 of the last 10 IUCN Key 1 Populations of Black Rhino remaining in Africa are to be found on private hunting conservancies in Zimbabwe."³⁹ BVC and SVC (~6,800 km²) depend entirely on revenue from sport hunting to fund their operations.⁴⁰

Without sport-hunting, this habitat would likely return to cattle ranching, and large populations of wildlife would be lost. Likewise, without the incentives generated through hunting, much CAMPFIRE land would be lost as habitat. This is *not* conjecture. It is empirical fact, based on the limited and inconsistent demand for non-consumptive tourism in Zimbabwe.⁴¹

Both communal and private areas have tried and failed to attract sustainable photographic tourism, due to "a combination of intractable contributing factors – from the global recession and downturn in tourism to poor international perception and desirability of Zimbabwe as a tourist destination, compounded by a severely depressed local economy, decaying infrastructure and diminished road and air-travel access. The industry operates at well below 50% occupancy based on current beds available and there is not a single

³⁴ *The Role of Hunting in Conservation and Livelihood Resilience*, p. 2.

³⁵ CAMPFIRE Association, *Hunting in CAMPFIRE Areas* (2014).

³⁶ *Id.*; *The Role of Hunting in Conservation and Livelihood Resilience*, p. 2, 17.

³⁷ *Id.* (As of 2014, "CAMPFIRE generates on average US\$2 million in net income every year which is much lower than estimated potential earnings for the Program. Income generation is mostly through the lease of sport hunting rights to commercial safari operators, as well as sales of hides and ivory, tourism leases on communal land and other natural resources management activities. As an industry, safari hunting has proven to be robust both environmentally and economically and, although not unscathed, [has been] fairly resilient in the face of serious socio-political uncertainty ... Although human encroachment and poaching has affected some communal wildlife areas in recent years, the CAMPFIRE program at national level still protects an area of wild land in excess of 50,000km², roughly equivalent in extent to the Parks and Wildlife Estate (Table 1). There are over 200,000 households that actively participate in the Program in CAMPFIRE hunting areas. Revenue received by communities, though relatively small, is used to directly offset the costs of living with wildlife through employment of game scouts or resource monitors.").

³⁸ *Zimbabwe Lion Conservation Report 2016*, p. 14; *Non-Detriment Finding*, p. 6-7, 9.

³⁹ *The Role of Hunting in Conservation and Livelihood Resilience*, p. 3.

⁴⁰ *SVC Report*, p. 5-6; *BVC Report*; M. Schwartz, National Geographic Cat Watch (Feb. 25, 2016) ("remember that the BVC used to be a cattle-ranching area, and if wildlife becomes unviable, then there is no reason not to convert it back to a cattle ranching area again"). See also IUCN, *Briefing Paper: Informing Decisions on Trophy Hunting* (2016), p. 2, 5, 7, 12.

⁴¹ *The Role of Hunting in Conservation and Livelihood Resilience*, p. 24; *SVC Report*, p. 2-3 ("Sport hunting and trophy hunting became the only economically viable land use options and have remained the only tangible source of income to the landowners of the SVC. In the case of the Senuko Lodge, for example, the land reform program resulted in a 98% cancelation of the confirmed bookings.").

working example of a community-owned non-hunting tourism venture catering to international clientele in the country.”⁴² Given Zimbabwe’s poor economy it is difficult to see them trying again, as photo-tourists require greater infrastructure and accessibility than hunting tourists do.⁴³ Sport-hunting alone incentivizes the preservation of most habitat in Zimbabwe.⁴⁴ “In Zimbabwe, over 75% of all conservation land under private, community and state tenure is entirely dependent on safari hunting revenues...” (7.9 million ha).⁴⁵

Hunting also incentivizes and pays for *improvements* in wildlife habitat. For example, BVC and SVC spend significant revenue on water provision. A smaller operator, Pro Safaris spends 6% of its gross turnover on “conservation,” largely for “water points installation, pipeline maintenance, water pumping, and de-silting of water pans...”⁴⁶ Water holes are one of the ways safari operators routinely improve available habitat.⁴⁷

Without hunting wildlife exists only in national parks. By providing, securing, and improving habitat, sport-hunting provides enhancement for the lion.

B. Sport-hunting in Zimbabwe provides significant anti-poaching support to protect the lion’s prey base.

Hunting revenues underwrite much of the anti-poaching which allows the lion’s prey base to flourish, and which thereby allows lion populations to grow. For example:

- In 2015 BVC spent \$590,000 in funds generated exclusively from sport-hunting to employ scouts, purchase equipment, and cover anti-poaching.⁴⁸ BVC protects the world’s third largest population of black rhino and incurs significant anti-poaching expenses to keep them secure from poachers.⁴⁹
- On average, SVC spends \$546,000 annually on anti-poaching, including a large expenditure for the protection of their black rhino population (approximately \$200,000/year).⁵⁰ The funds are largely generated from sport-hunting and donations from clients.⁵¹
- The Dande Anti-Poaching Unit (DAPU) in the Zambezi Valley is among the most successful. They reduced elephant poaching in their concessions from 40 carcasses in 2010 to only three in 2015. DAPU supports 22 community scouts and 18 council scouts. In 2014, they picked up 2,375 snares,

⁴² *The Role of Hunting in Conservation and Livelihood Resilience*, p. 3.

⁴³ *Id.* at 24 (“By comparison to [photo]-tourism, safari hunting operates on much higher income per tourist with much lower tourist throughflow and total bed-nights and requires far less capital outlay for accommodation and hospitality infrastructure. Not only are these extremely important considerations in the context of the poor socio-economic and political climate for investment and tourism in Zimbabwe ... Public health scares such as Ebola, terrorism, political unrest and social disturbances have had demonstrably serious impact on tourism traffic to different parts of Africa and is especially true of non-consumptive ecotourism which is far more sensitive to such deterrents than is trophy hunting ...”). See also IUCN, Briefing Paper: Informing Decisions on Trophy Hunting (2016), p. 8.

⁴⁴ Sport hunting incentivizes the preservation of an area larger than Kenya’s national parks. CAMPFIRE areas alone represent almost 50,000 km², and Kenya’s NPs are only ~47,000. See IUCN/UN, 2014 United Nations List of Protected Areas, <http://blog.protectedplanet.net/post/102481051829/2014-united-nations-list-of-protected-areas>.

⁴⁵ *The Role of Hunting in Conservation and Livelihood Resilience*, p. 11-12, 17-18.

⁴⁶ *Pro Safaris Report*, p. 3.

⁴⁷ See, e.g., *CWS Report; Zimbabwe Lion Conservation Report 2016*, p. 18.

⁴⁸ *Zimbabwe Lion Conservation Report 2016*, p. 20 (this amount does not include incentives and rewards donated for these purposes).

⁴⁹ *BVC Report*, p. 5.

⁵⁰ *Id.* at p. 5.

⁵¹ *SVC Report*, p. 5-6; *Zimbabwe Lion Conservation Report 2016*, p. 20.

convicted 19 meat poachers, retrieved 22 weapons, and paid over \$9,000 in rewards.⁵² This unit is wholly funded by hunting operator Charlton McCallum Safaris, and the contributions of its safari clients.⁵³ By protecting the lion's prey base, DAPU is significantly supporting lion conservation.

- Pro Safaris in the Rifa Safari Area contributes 39% of their gross revenue to PWMA, which supports wildlife management and monitoring as well as PWMA anti-poaching rangers.⁵⁴ They spend 6% of their gross to fund their own anti-poaching unit of ten scouts. Their team coordinate with PWMA rangers to police the 40-km international border with Zambia and an area covering ~506 km² (close to the size of Redwood National and State Parks in California combined). Ivory poaching is a threat, and funds generated from hunting help protect the elephant and other prey in the area.⁵⁵
- In 2013-2014, the anti-poaching teams supported by Martin Pieters Safaris conducted 289 patrols, recovered 165+ snares (a total of 15,000+ since 2007), recovered five firearms and ammunition, recovered four pairs of tusks as well as poached fish and meat, and arrested 123 poachers.⁵⁶ This company spends more than \$40,000/year on anti-poaching in their concessions.⁵⁷
- Martin Pieters Safaris is also helping establish a communal conservancy in the Omay area that has two seven-man anti-poaching teams. They have been extensively trained in weapons, tactics, and offensive maneuvers with the operator's support. This unit has branched into Gokwe and other communal lands, and cooperates extensively with Police and community scouts. As of November, this unit arrested over 120 poachers and traffickers, many of whom were hardened, professional poachers whose removal significantly benefits the lion's prey base.⁵⁸
- In March, a safari operator father and son lost their lives in a tragic accident as they were waiting to assist an anti-poaching patrol.⁵⁹ They dedicated their funds, their time, and ultimately their lives to protecting wildlife. The commitment of hunting operators cannot be questioned. Their efforts are obviously enhancement for the lion and other species.

These are but a few examples of the essential support safari operators provide to maintain and increase the lion's prey base, addressing this threat and enhancing the survival of the lion in the wild.

⁵² DAPU, Year-End 2015 Report (Oct./Nov. 2015), p. 9-20; DAPU, End-of-Year Report (Oct.-Dec. 2015).

⁵³ *Id.* at 3, 19.

⁵⁴ *Pro Safaris Report*, p. 3.

⁵⁵ *Id.*; see also *CWS Report*.

⁵⁶ Martin Pieters Safaris, Sustainable Use Benefiting Communities, Blog (Nov. 18, 2015); Martin Pieters Safaris, Lion Data (2016) (*M.P. Report*), p. 9.

⁵⁷ Martin Pieters Safaris, Anti-Poaching ... Fighting Back (African Conservancies Anti-Poaching 2015), Blog (Jan. 26, 2016).

⁵⁸ *Id.*

⁵⁹ The Zambezi Society, Factual Report on the Tragic Deaths of Two Wildlife Conservation Volunteers in Mana Pools National Park (Mar. 14, 2016), <http://www.zamsoc.org/?p=2121>; see also The Zambezi Society, Update Letter (Apr. 2016) (offering memorial to these operators; also describing the operations of MAPP, an anti-poaching unit run by another hunting operator), <http://us10.campaign-archive1.com/?u=f4943277ce971cb1c9028d068&id=a10245916e&e=959ad7ac3f>.

C. Sustainable use through sport-hunting is essential to reducing human-wildlife conflicts and the success of Zimbabwe's community based conservation program.

Sustainable use, largely through sport-hunting, is a pillar of CAMPFIRE.⁶⁰ This is due to the basic principle that co-existence of wildlife and people is improved, and people are more tolerant of the negative effects of wildlife, if wildlife has value.⁶¹ For instance, lion "hunting contributes to the conservation of lions via the financial revenue generated [through CAMPFIRE], which is ploughed back into conservation of the resource and empowers local communities to invest in their own rural development programs."⁶²

Consistent with CAMPFIRE revenue-sharing guidelines, hunting operators in communal areas pay a large percentage of revenues and fee income to the communities. For example, in the Dande area one operator pays well over 40% of gross sales to CAMPFIRE wards and councils. When payments to the government are included, the company retains less than half its income.⁶³ Like many others in Zimbabwe, the company believes "People MUST get FAIR value for their game, or all is lost," "make[s] sure that all hunting proceeds are correctly channelled [sic] in to producer ward accounts," and operate with "[s]trong social responsibility i.e. we allocate \$67,000 per annum to District and Ward projects and we ensure there is transparency."⁶⁴

In the Omay area, Martin Pieters Safaris and its associates contribute over \$200,000 annually "straight to the producer communities for community developmental projects."⁶⁵ In 2013-2014 the communities used these funds for a range of projects, including but not limited to:

- Building or repairing five teachers' houses, ten classrooms/blocks, and four administrative offices;
- Building or obtaining school supplies including two blackboards;
- Rehabilitating three water pipelines or boreholes;
- Constructing feeder roads;
- Obtaining or repairing heavy equipment including one tractor;
- Helping the community obtain construction materials, build toilets, and use funds for traditional ceremonies.⁶⁶

These direct benefits increase tolerance, and thus increase numbers of wildlife, in an area of ~8,094 km².⁶⁷ "Communities receive direct benefit both financially and through various projects implemented by Martin Pieters Safaris such as clinics, schools, vehicles for anti-poaching and the employment of scouts."⁶⁸ These benefits arise in "a remote inhospitable concession that has no other land use model due to very erratic

⁶⁰ CAMPFIRE Association, *Hunting in CAMPFIRE Areas* (2015); CAMPFIRE Association, Website ("Vision: To see rural communities in Zimbabwe freed from the vagaries of poverty and enjoying the benefits of the sustainable use of their natural resources ..."); see also *M.P. Report*, p. 1; IUCN, *Briefing Paper: Informing Decisions on Trophy Hunting* (2016), p. 4-7.

⁶¹ *Zimbabwe Lion Conservation Report 2016*, p. 11; see also Chiefs, EU in Wildlife Talks, *The Herald* (Apr. 2, 2016), <http://www.herald.co.zw/chiefs-eu-in-wildlife-talks/>.

⁶² *Id.*

⁶³ DAPU, *Year End Report* (2015).

⁶⁴ *Id.* at p. 3

⁶⁵ *M.P. Report*, p. 1-7; Martin Pieters Safaris, *Sustainable Offtake Benefiting Communities*, Blog (Nov. 18, 2015).

⁶⁶ *Id.*

⁶⁷ *Id.*

⁶⁸ *Id.*

and low rainfalls, and abundance of mosquitos, tsetse flies and poor soils. The only benefit local people have, is to receive financial remuneration from hunting safari off take and employment.”⁶⁹

Outside of communal areas, hunting also generates benefits for rural Zimbabweans. Operators contribute to enhancing quality of life for those impacted by wildlife to incentivize tolerance and conservation. These contributions are made in cash, much-needed goods or services, and game meat.

For example, BVC’s community assistance projects include drilling and equipping eight boreholes, building a clinic and staff houses with electrification and running water, contributing sport uniforms and transport for the youth soccer program, and more. According to the Conservancy’s manager, “the identifiable costs of the clinic amount to just over \$178,000 but there are many other hidden costs involved.”⁷⁰

Over and above these contributions, BVC has contributed 1,600 kg of meat each month since July 2011 to a trust administered by local chiefs to provide protein for school and community events and allow for the sale of excess meat to fund community projects.⁷¹ Overall, BVC donates over 45 tons of meat annually to local communities.⁷²

Similarly, SVC supports nearby communities through cash, service, in-kind, and meat donations. In 2012, for example, the conservancies’ contributions topped \$100,000 and included provision of water, repair or construction of schools and clinics, payment of school fees, provision of computer equipment, and regular meat donations, among other things.⁷³ Game meat contributions are a key benefit for local people:

[SVC] recently entered into a mutually dependent agreement with the Chiefs representing communities surrounding ... The agreement links the communities to the natural resource utilisation that occurs through the business operation of the conservancy and opens up opportunities for local indigenous populations to share in wealth creation... The hunting tourism of the conservancy is currently the only form of income by which the surrounding communities can benefit. Revenues from lion hunting constitute a significant portion of inflow and thus an important part of the community benefits.⁷⁴

⁶⁹ *Id.* (“Every year several local villagers are killed or maimed by elephant, lion, buffalo, hippo and crocodile, they live in close proximity to these animals and only tolerate them because we as a hunting company give back to the community. It is very important for the protection of our wildlife in these remote areas that we continue to assist the RDC with anti-poaching continue to pay for the sustainable off take of a select quota, because if we do not, the locals will kill every animal, they will not tolerate wildlife disruptions to their families, be it through destruction of their crops on an annual basis, or the loss of their family members.”).

⁷⁰ B. Leathem (Mazunga Safaris), Email re: Community Assistance Program in BVC and attached spreadsheet (Jan. 20, 2016).

⁷¹ *Id.* Similarly, 1,000 kg of meat each (2,000 total) is donated to the Beit Bridge communities (since April 2014) and the Mwenezi communities (since Aug. 2013). *Id.*; *Zimbabwe Lion Conservation Report 2016*, p. 14-15; Conservation Imperative, The Fate of the African Lion: Buby Valley Conservancy (Aug. 4, 2015) (*Fate of the African Lion Film*), <http://theconservationimperative.com/?p=112> (game meat donations are a “direct spinoff” of the hunting program, and help build strong relationships with local chiefs. Any poachers found in the area are taken to the chiefs’ courts and prosecuted there, and “asked to compensate for the value of the animals killed and the compensation goes back to the community kitty.” This is a powerful community engagement system that benefits the wildlife directly.

⁷² *Zimbabwe Lion Conservation Report 2016*, p. 12 (BVC’s “meat donation is worth over US\$100,000 per year, and the communities are free to decide how they use it.”).

⁷³ *Id.*

⁷⁴ *SVC Report*, p. 5.

Hunting operators are also employers in a tough economy.⁷⁵ A small operator can employ 14-20 people; a medium operator can employ 14 staff, ten scouts, six trackers, and three professional hunters;⁷⁶ and a large operator like BVC can employ 350-400 staff and thereby support approximately 2,000 people.⁷⁷

It should also be noted that hunting clients make substantial contributions to local communities. One lion hunter expects to contribute over \$7,500 in gratuities during his safari, a “blue bag” donation, and perhaps an additional cash donation to a community or conservation purpose.⁷⁸ This is but one example – voluntary donations also help cover the anti-poaching expenses of DAPU, BVC, and SVC, among other things, and in turn this provides employment for local trackers and scouts.

The importance of these benefits cannot be overstated, because human-lion conflict is arguably the prime threat to lion in Zimbabwe.⁷⁹ This is one hunter of many, but put together these gifts provide considerable extra revenue for the poor and marginalized in a poor country, and sustain expensive anti-poaching efforts to protect endangered species. Added to the revenue/fee sharing and voluntary contributions from safari operators, hunting demonstrably benefits people, which in turn enhances the lion’s survival.

III. Revenue from U.S. hunters is used for conservation and maintaining viable lion populations.

The revenue generated from U.S. clients contributes hugely to lion conservation and habitat protection in Zimbabwe.

BVC and SVC each rely *solely* on the income from hunting, especially lion hunting, to fund their operations. Their clientele is overwhelmingly American.⁸⁰ These conservancies represent ~6,400 km² of former cattle ranches that instead host large and sustainable rhino, antelope, cheetah, wild dog, and lion populations (among others).⁸¹ The hunting of lion pays for the conservation of these other species, and the inability to sell lion hunts in their largest market puts the habitat, the prey base, the lion and all these other species at risk due to lack of funding. As BVC’s anti-poaching manager explained in a video sent to the FWS:

The BVC is about 3,000 square km ... It derives its whole income from hunting operations ... *Without the hunting there would be basically no reason for this area to exist or it would be a cattle area.* Having this large unit of land set aside for wildlife has meant that endangered species like black and white rhinoceros thrive here. We’ve got important populations of cheetah, wild dog as well, brown hyena, pangolins. So under the umbrella of hunting, this whole habitat is benefiting a whole variety of other species that are not consumptively hunted but they are benefiting from this wildlife area. Without hunting we would be very

⁷⁵ Zimbabwe faces a 95% unemployment rate. CIA World Factbook, <https://www.cia.gov/library/publications/the-world-factbook/geos/zi.html>.

⁷⁶ *Pro Safaris Report*, p. 3 (19% of turnover goes to salaries and on average supports 165 people; because concession is not located near a community, operator donates game meat to PWMA rangers and scouts, to government for state functions, and to orphanage, for total of 6,137 kg annually (\$12,250 and 2% of their gross income)).

⁷⁷ *CWS Report; Fate of the African Lion Film*.

⁷⁸ J. Hedgecock Statement (attached to Import permit application); J. Hedgecock, pers. comm. (2015-2016).

⁷⁹ *Zimbabwe Lion Conservation Report 2016*, p. 11. Note that in a three-year period, seven people were killed.

⁸⁰ U.S. citizens represent over 90% of BVC and SVC’s respective clientele. *Zimbabwe Lion Conservation Report 2016*, p. 23; *SVC Report*, p. 4.

⁸¹ *Zimbabwe Lion Conservation Report 2016*, p. 4.

hard put to justify keeping this big expensive land in its current land use. The conservancy covers all its own anti-poaching costs. It is quite an expensive operation.⁸²

Lion hunting generates an estimated 33.9% of BVC's annual gross revenue – one-third of the funds needed to keep: the conservancy open as prime habitat, the anti-poaching patrols on the ground, and the future of the lion, black rhino, wild dog, and other species secure.⁸³ This is undoubtedly enhancement.

Likewise, as SVC reports, a "ban on lion trophy imports into the US will effectively result in a collapse of the lion hunting industry in the Savé Valley Conservancy, where on average 90% of hunting clients are American (up to 98% for some properties) ... The loss of the [approx.] \$375,000 annual revenue will be catastrophic for the conservancy, inevitably resulting in less investment in security and other conservation measures."⁸⁴

In short, the revenue from U.S. hunters is critical because lion in conservancies eat hundreds of thousands of dollars in huntable prey per year. And if the lions do not generate revenue there will be no incentive to maintain their large populations.⁸⁵

On a smaller scale, high-quality operators like Cliff Walker and Pro Safaris, which together police the Rifa Safari Area, could not exist but for U.S. clients. Mr. Walker maintains high hunting and conservation ethics and targets U.S. clients because they share these values.⁸⁶ Almost all (86%) of his clients are U.S. citizens paying an average of \$107,500 each in fees, which are ploughed back into Rifa SA, salaries, anti-poaching, and PWMA anti-poaching.

Similarly, lions are a major contributor to Pro Safaris' conservation/operating budget, and U.S. citizens are the main source of Pro Safaris' clients (75% of their lion were harvested by U.S. citizens).⁸⁷ The operator estimates that its conservation funding would fall by 36% if lion hunting declined because of an import ban. "Rifa Safari area has a small quota on all species. Lion therefore is a major contributor to the conservation of Elephant and the habitat to all species ... the Loss of the US Hunters will have a major negative impact on the survival of the viability of this area as a wildlife area."⁸⁸

U.S. hunters are huge contributors to Zimbabwe's conservation hunting program: they are the force that keeps Zimbabwe's hunters in business and keeps most habitat, anti-poaching, and CAMPFIRE benefits in place. Their presence enhances the survival of the lion, and their absence will do the opposite.

Conclusion

On the whole, the U.S. market represented "70.4% of the total Zimbabwean lion sport-hunting industry" between 2005 and 2015,⁸⁹ and that may even be higher. This means at least \$7 out of every \$10 directed

⁸² *Fate of the African Lion Film*; see also *Zimbabwe Lion Conservation Report 2016*, p. 20 ("saturation of lions in wildlife areas on both state and private land is positive for their future conservation security ... It is also critical to incidentally conserved endangered species, such as both species of rhino on private wildlife conservancies in Zimbabwe ..., which benefit from the same resources and protection incentivized and provided by the revenue generated from hunting").

⁸³ *Zimbabwe Lion Conservation Report 2016*, p. 22.

⁸⁴ *SVC Report*, p. 4.

⁸⁵ *BVC Report*, p. 5-6.

⁸⁶ *CWS Report*.

⁸⁷ *Pro Safaris Report*, p. 4.

⁸⁸ *Id.*

⁸⁹ *Zimbabwe Lion Conservation Report 2016*, p. 23.

to habitat protection comes from U.S. citizens. \$7 of every \$10 directed to anti-poaching comes from U.S. citizens (and that amount is likely higher given the voluntarily donations often made by U.S. clients). And \$7 of every \$10 contributed to communities to reduce human-lion conflict comes from U.S. clients. The contributions of U.S. clients are enhancing the survival of the lion in Zimbabwe far more than anyone else.

The Final Rule identified three primary threats to lion: loss of habitat, loss of prey base, and human-lion conflict. As shown here, in the enclosed, and in the previously submitted documents, U.S. citizens are the greatest contributors to efforts that reduce or remediate these threats. Sport-hunting in Zimbabwe, and lion hunting specifically, provides a reason to preserve thousands of kilometers of habitat for lion and prey species. It is the primary funder of the anti-poaching units that maintain or increase the lion's prey base. Hunting revenues provide the main funding for Zimbabwe's CBNRM program and the main contributor of other benefits to Zimbabwe's rural communities.

Because it substantially reduces the threats and contributes to the growth of Zimbabwe's lion population, Zimbabwe's well-managed sport-hunting program enhances the lion's survival. Accordingly, the enclosed permit applications, and those previously submitted, should be approved and permits issued.

We believe this information and the information already in the FWS' possession satisfies the requirements of 50 C.F.R. § 17.40(r) for Zimbabwe. We ask that you consider all that information in evaluating these permit applications. We will also continue to submit information about the benefits generated by safari hunting as it becomes available.

Sincerely,

John J. Jackson, III
Regina Lennox



Enclosures:

- Application submitted on behalf of Phillip Glass to import a sport-hunted lion trophy to be hunted in Nyaminyami CAMPFIRE Area, Zimbabwe
- Application submitted on behalf of Timothy Haley to import a sport-hunted lion trophy to be hunted in Rifa Safari Area, Zimbabwe
- Application submitted on behalf of Justin Hedgecock to import a sport-hunted lion trophy to be hunted in Matetsi Safari Area, Zimbabwe
- Application submitted on behalf of Eric Rau to import a sport-hunted lion trophy to be hunted in NW Matabeleland, Zimbabwe
- Application submitted on behalf of Cooper Ribman to import a sport-hunted lion trophy to be hunted in Buby Valley Conservancy, Zimbabwe
- Index of Documents Enclosed and Submitted

ENHANCEMENT INFORMATION ON THE AFRICAN LION

ZIMBABWE

No.	Title	Sent to FWS
1	Zimbabwe Parks & Wildlife Management Authority, Conservation Status of the African Lion (<i>Panthera leo</i>) in Zimbabwe (January 2015)	1/11/16
2	Zimbabwe Parks & Wildlife Management Authority, Age Restrictions on Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe (2014)	1/11/16
3	Dr. Byron du Preez [Oxford], Buby Valley Conservancy Lion Research Report (Jan. 12, 2016)	1/12/16
4	Blondie Leathem (Mazunga Safaris), Email re: Community Assistance Program in BVC, attaching spreadsheet (Jan. 20, 2016)	1/26/16
5	L. Muller, Chair, Zimbabwe Professional Hunters & Guides Association, Letter re: Lion Import Suspension (Jan. 20, 2016)	1/26/16
6	Dr. Rosemary Groom, Lion Hunting in Zimbabwe's Save Valley Conservancy (Jan. 27, 2013)	1/26/16
7	Dr. Byron du Preez et al., Zimbabwe Lion Conservation Research Report 2016: Sport Hunting and Lion (<i>Panthera leo</i>) Conservation in Zimbabwe (Jan. 31, 2016)	2/1/16
8	Conservation Imperative, The Fate of the African Lion: Buby Valley Conservancy (Aug. 4, 2015)	2/24/16
9	Martin Pieters Safaris, "Lion Data" (2016)	4/20/16
10	Michael Schwartz, Culling to Conserve: A Hard Truth for Lion Conservation, National Geographic Cat Watch (Feb. 25, 2016)	4/20/16
11	Zimbabwe Parks & Wildlife Management Authority, Conservation Strategy and Action Plan for the Lion (<i>Panthera leo</i>) in Zimbabwe	4/20/16
12	CAMPFIRE Association, Hunting in CAMPFIRE Areas (2014)	4/20/16
13	CAMPFIRE Association, Update to Hunting in CAMPFIRE Areas (2015)	4/20/16
14	Dr. C. Masterson (Ed.), Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe, Ethics and Coordination Committee for Ethical and Substantial Safari Hunting in Zimbabwe (Apr. 12, 2016)	4/20/16
15	L. Muller, Rifa Safari Area/Pro Safaris Africa, Report on Lion Panthera Leo (Jan. 25, 2016)	4/20/16
16	Cliff Walker Safaris, Enhancement Report (2016)	4/20/16
17	IUCN, Briefing Paper: Informing Decisions on Trophy Hunting (2016)	4/20/16
18	DAPU, Year-End 2015 Report (Oct./Nov. 2015)	4/20/16
19	DAPU, End-of-Year Report (Oct.-Dec. 2015)	4/20/16
20	Martin Pieters Safaris, Sustainable Offtake Benefiting Communities, Blog (Nov. 18, 2015)	4/20/16
21	Martin Pieters Safaris, Anti-Poaching ... Fighting Back (African Conservancies Anti-Poaching 2015), Blog (Jan. 26, 2016)	4/20/16
22	Nengasha Safaris, Letter re: Enhancement (2016)	4/20/16



Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

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 06 2016 LA

Complete Sections 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 Cook	1.b. First name Andrew	1.c. Middle name or initial (b) (6)	1.d. Suffix N/A
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions) N/A
6.a. Telephone number (b) (6)	6.b. Alternate telephone number N/A	6.c. Fax number N/A	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. Mailing address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)			
1.b. City Honeoye Falls	1.c. State NY	1.d. Zip code/Postal code: (b) (6)	1.e. Country USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) Same as above			
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. Country

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – <i>attach documentation of fee exempt status as outlined in instructions.</i> (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in <i>Title 50, Part 13 of the Code of Federal Regulations</i> and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) <u>Andrew Cook</u> Date of signature (mm/dd/yyyy) <u>6/3/16</u>	

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (*Appendix I of CITES and/or ESA*)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting, please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
Panthera leo (African Lion)
 - b. Sex (if known).
To be male only
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:
Munyamadzi Luawata GMA, Muchinga Province, Mpika, ZAMBIA
 - b. Date wildlife is to be hunted:
Between June 22 and July 15, 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 skin with claws; complete skull
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
 - b. Date wildlife was hunted:

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Sylvia van Staden
Business Name: van Staden Safaris (Z) Ltd.
Address: 244 Lukanga Road
Address: Roma
City: Lusaka
State/Province: Central Province
Country, Postal Code: Zambia

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

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: Andrew Cook Date: 6/3/16

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/e/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).
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):
Andrew Cook by email at (b) (6) or Mark Audino, hunting consultant at Henley & Delamere Adventuring by email at maudino1@rochester.rr.com, or by phone at (585) 582-2926.
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)

UNRECORDED

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Five Star Bank
Leopard import permit *Jaunay. Cost*



Pay to the order of *Ms Trish 3 Nideleya* \$ *100 -*
One hundred 30/100

Total Value Premier Checking

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Reactive
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(b) (6)

6/3/16

3/16

(b) (6)

RCVD JUN 06 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: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name Ragazzine	1.b. First name Justin	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions)
6.a. Alternate telephone number (b) (6)	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address (b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (dba)	
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information			
1. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)			
1.b. City Youngstown	1.c. State Ohio	1.d. Zip code/Postal code (b) (6)	1.e. Country/Province USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)			
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. Country/Province
2.f. Country			

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 17451009SC/9 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) <i>Justin Ragazzine</i> Date of signature (mm/dd/yyyy) 01/08/2019	

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (*Appendix I of CITES and/or ESA*)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
Panthera leo
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
 - b. Date wildlife is to be hunted:
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
Zimbabwe, Save Valley Conservancy, Chishakwe Hunting Concession
 - b. Date wildlife was hunted:
November 27 2017

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

Skin, Skull, & Claws

- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4 Josiah Chinamano Road
Belmont, Bulawayo
Zimbabwe

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Cuan
Business Name: Trophy Consultant International
Address: 4 Josiah Chinamano Road
Address:
City: Belmont
State/Province: Bulawayo, Zimbabwe
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: Justin Rogers Date: 1/8/18

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

Fauna & Flora Custom House Brokers
15231 135TH Ave
Jamacia, NY. 11434

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

John Meehan
(201) 370-2366

jjmeehan@faunaandflora.com

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

RCVD JAN 30 2018

UNITED STATES POSTAL SERVICE®		POSTAL MONEY ORDER	
Serial Number	Year, Month, Day	Post Office	U.S. Dollars and Cents
(b) (6)	2018-01-09	(b) (6)	\$100.00
Amount		One Hundred Dollars and 00/100 *****	
Pay to	Clerk 03		
US Fish & Wildlife Service			
Address	From		
5725 Leesburg Pike	Justin Ragazzine		
Falls Church, VA 22041	Address		
	(b) (6)		
Memo	Youngstown Ohio (b) (6)		
© 2018 United States Postal Service. All Rights Reserved.			
SEE REVERSE WARNING - NEGOTIABLE ONLY IN THE U.S. AND POSSESSIONS			
(b) (6)			



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 APR 17 2017

48

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:

IMPORT OF SPORT-HUNTED TROPHIES Threatened-listed
(Appendix I of CITES and/or ESA) lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C; see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name Henson	1.b. First name Amanda	1.c. Middle name or initial	1.d. Suffix
2. Date of birth (mm dd yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation	5. Affiliation: Doing business as (see instructions) N/A
6.a. Telephone number (b) (6)	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution N/A		1.b. Doing business as (dba)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information			
1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)			
1.b. City Carrollton	1.c. State Texas	1.d. Zip code/Postal code (b) (6)	1.e. Country/Province USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) (b) (6)			
2.b. City Dallas	2.c. State Texas	2.d. Zip code/Postal code (b) (6)	2.e. Country/Province USA

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew or issue. No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) <u>Amanda Henson</u> Date of signature (mm dd/yyyy) <u>4/07/2017</u>	

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (*Appendix I of CITES and/or ESA*)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least 90 days for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting, please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
P. l. melanochaita (African lion) (wild-managed population)
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
N/A
 - b. Date wildlife is to be hunted:
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
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, Northern Cape, Upington – Kalahari Oryx Game Farm
 - b. Date wildlife was hunted:
24 July 2016

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

All parts including skin, skull, teeth, and claws

- d. The current location of the trophy (address and country) [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]:

Life - Form Taxidermy, 7 Aluminium Road, White River,
Mpumalanga 1240, South Africa

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:

Business Name: Life - Form Taxidermy

Address: 7 Aluminium Road

Address: White River

City:

State/Province: Mpumalanga 1240

Country, Postal Code: South Africa

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information provided by Conservation Force and South African authorities and operators, and the positive CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below) enhancement finding for wild-managed lion dated October 2016.

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: Amade Henard Date: 4-7-17

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/lc/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).
9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):
10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.
- ☒ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.
11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
John J. Jackson, III or Regina Lennox of Conservation Force
504-837-1233, 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.



environmental affairs

REPUBLIC OF SOUTH AFRICA

Private Bag X 447 PRETORIA 0001 437 Steve Biko Road Arcadia PRETORIA Tel: +27 66 111 2468

Enquiries: Mr Mpho Tjane
Tel: (012) 399 9596 Email: mptho@environment.gov.za

Department of Environmental Affairs and Nature Conservation
Private Bag X6102
KIMBERLY
8301

Fax (053) 807 7367

Dear Mr Jacobs

CONFIRMATION OF KALAHARI ORXY AS A FACILITY IN POSSESSION OF WILD PANTHERA LEO (LION) POPULATION

The South African Government has in the 2016 annual year submitted information on the enhancement of the hunting of the wild South African lion populations to conservation of the species and upon a thorough assessment the United States Fish and Wildlife Service has approved the enhancement finding on the hunting of the South African populations of Wild lions allowing for the importation of trophies from wild sourced lions

In order to ensure that integrity of the hunting farms that possesses wild lions, an assessment criteria was developed which looks at aspects including: the area is sufficient to sustain a single social unit, the populations have a viable social structure, they are breeding in area in which they are roaming, the animals are not fed or receive any supplementary feeding and that the populations are from the wild

In light of the above, the South African Government would like to confirm that **Kalahari Oryx Private Game Reserve** situated in the Northern Cape has been recommended as a facility that is possession of **wild lion populations** that are viable for hunting purposes

Hope you find the above in order

Yours sincerely

Ms Nosipho Ngcaba
Director-General
Department of Environmental Affairs
Letter signed by: Mpho Tjane
Designation: Deputy Director CITES
Date: 14/11/17

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed, wild-managed African lion trophy from South Africa.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: Amanda Henson

Name: Amanda Henson

Date: 4-7-17

(b) (6)

61-106/829

(b) (6)

DATE

4/7/17

PAY TO THE
ORDER OF

VS Fish & Wildlife Service

\$ 100 ⁰⁰/₁₀₀

One Hundred & 00/100

DOLLARS



Deposits made by
check or cash

Reliance
Bank

P.O. Box 7878
Pine Bluff, Arkansas 71611
www.reliancebank.com
678-536-7322

MEMO

Amanda Hansen

(b) (6)

[Handwritten signature]


NP



Permit Number: MA31841C-0
Effective: 09/01/2017 Expires: 08/31/2018

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803



CHIEF, BRANCH OF PERMITS, DMA

Permittee:

AMANDA HENSON

(b) (6)
CARROLLTON, TX (b) (6)
U.S.A.

Authority: Statutes and Regulations: 16 USC 1539(a); 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

- A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in South Africa for the purpose of enhancement of the survival of the species.
- B. Specimen may not be sold or transferred for any financial remuneration.
- C. Trophy must have been taken during the 2016 hunting season in Kalahari Oryx Private Game Reserve, Northern Cape.
- D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of South Africa for the 2016 season.
- E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.
- F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.
- G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. This permit can be photocopied.
- H. Valid for use by permittee named above.
- I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).



Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES Threatened-listed
(Appendix I of CITES and/or **ESA**) lion

RCVD DEC 08 2017

LB

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name TAYLOR	1.b. First name CHRISTOPHER	1.c. Middle name or initial (b) (6)	1.d. Suffix MR
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number (b) (6)	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution N/A		1.b. Doing business as (dba)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information				
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)				
1.b. City Berthold	1.c. State ND	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province	1.f. Country USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) (b) (6)				
2.b. City Berthold	2.c. State ND	2.d. Zip code/Postal code: (b) (6)	2.e. County/Province	2.f. Country USA

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 15US76241B/9 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1091. 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/of 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 handcraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting, please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
Panthera leo melanochaita (African lion)
 - b. Sex (if known).
Male
2. IF ANIMAL IS CURRENTLY LIVING IN THE WILD, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
Bubye Valley Conservancy, Masvingo Province, Zimbabwe
 - b. Date wildlife is to be hunted:
Between the 21st May 2018 and the 7th June 2018
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
Skin (Life size mount including claws) and the skull
3. IF THE ANIMAL IS DEAD, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
 - b. Date wildlife was hunted:

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:
Business Name: TROPHY CONSULTANTS INTERNATIONAL
Address: 4 JOSIAH CHINAMANO ROAD
Address: BELMONT
City: BULAWAYO
State/Province:
Country, Postal Code: ZIMBABWE

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information provided by Conservation Force, Bubyee and Save Valley Conservancies, Zimbabwe authorities, CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below) **safari operators, and others**

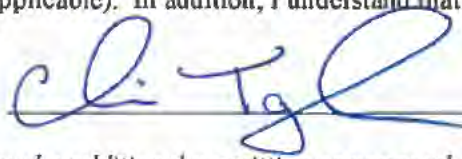
6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: N/A Date: _____

7. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: 

Date: 11/27/17

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).
9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):
10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.
- ☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.
11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Attorneys at Conservation Force, 504-837-1233, cf@conservationforce.org
12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?
- ☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

CASH ONLY IF ALL CheckLock™ SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPYING

(b) (6)

First Western Bank and Trust
77-1044/913

(b) (6)

12/4/2017

PAY TO THE ORDER OF US Fish and Wildlife Services

\$100.00

One Hundred and 00/100*****

DOLLARS

US Fish and Wildlife Services

PROTECTED AGAINST FRAUD

MEMO

(b) (6)

[Handwritten Signature]



Barry , Anna <anna_barry@fws.gov>

Christopher T aylor PRT #66783C

1 message

Barry , Anna <anna_barry@fws.gov>
To: "John J. Jackson, III" <jjj@conservationforce.org>

Thu, Mar 1, 2018 at 2:50 PM

Received, thanks.

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 Thu, Mar 1, 2018 at 2:25 PM, John J. Jackson, III <jjj@conservationforce.org> wrote:

Hi Anna,

Conservation Force is representing Chris Taylor. His PRT is #66783C. On his permit application the original hunt was between May-June 2018. The hunt will now take place from October 4 through October 23, 2018.

Please update his application accordingly.

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



Department of the Interior
U.S. Fish and Wildlife Service

OMB No 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

RECEIVED 20 2017

LP

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES Threatened-listed
(Appendix I of CITES and/or **ESA**) lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1 a. Last name <i>Link</i>	1 b. First name <i>Kenia</i>	1 c. Middle name or initial <i>(b) (6)</i>	1 d. Suffix
2 Date of birth (mm/dd/yyyy) <i>(b) (6)</i>	3 Social Security No. <i>(b) (6)</i>	4 Occupation <i>(b) (6)</i>	5 Affirmation/Doing business as (see instructions)
6 a. Telephone number <i>(b) (6)</i>	6 b. Alternate telephone number <i>(b) (6)</i>	6 c. Fax number <i>(b) (6)</i>	6 d. E-mail address <i>(b) (6)</i>

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1 a. Name of business, agency, Tribe, or institution <i>N/A</i>		1 b. Doing business as (dba)	
2 Tax identification no.		3 Description of business, agency, Tribe, or institution	
4 a. Principal officer Last name	4 b. Principal officer First name	4 c. Principal officer Middle name/initial	4 d. Suffix
5 Principal officer title		6 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) <i>(b) (6)</i>			
1 b. City <i>Wascott</i>	1 c. State <i>WI</i>	1 d. Zip code/Postal code <i>(b) (6)</i>	1 e. Country/Province <i>USA</i>
2 a. Mailing Address (include if different than physical address, include name of contact person if applicable) <i>(b) (6)</i>			
2 b. City <i>(b) (6)</i>			2 c. Country <i>USA</i>

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <i>Kenia Link</i> Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) <i>12/14/2017</i>

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (*Appendix I of CITES and/or ESA*)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

P. l. melanochaita (African lion)

b. Sex (if known).

Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

b. Date wildlife is to be hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

Area between Selous and Lunda Tanzania

b. Date wildlife was hunted: July 18th 2017

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

Full Skin/Hide, SKULL, CLAWS

- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

Selous Game Reserve, Dar es Salaam, Tanzania

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Amed Huwel

Business Name: MKWAWA

Address: Selous Game Reserve

Address:

City: Dar es Salaam

State/Province: Tanzania

Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information provided by Conservation Force, Tanzanian authorities, and safari operators.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: N/A Date: _____

7. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  Date: 12/14/2017

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):

Link's Wild Safaris

(b) (6)

Milwaukee, WI

(b) (6)

ATTN: Tommy * Air Bill *
Enclosed

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Attorneys at Conservation Force, 504-837-1233, cf@conservationforce.org

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed lion trophy from Africa.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: _____

Kenia Link

(b)
(6)

Name: _____

Kenia Link

Date: _____

12/14/2017

FOR SECURITY PURPOSES, THE FACE OF THIS DOCUMENT CONTAINS A TWO-TONED COLORED BACKGROUND AND MICROPRINTING IN THE BORDER

National Bank of Commerce
79-2918

12/14/2017

(b) (4)

(b) (4)

PAY TO THE
ORDER OF

US Fish & Wildlife

\$ **100.00

One Hundred and 00/100*****

DOLLARS

US Fish & Wildlife

MEMO

SECURITY FEATURES INCLUDED. DETAILS ON BACK

Jack P. Smith
AUTHORIZED SIGNATURE

(b) (4)

FWS PERMIT CODE SHEETPermit Type: F20

Action:

NEW

AMD (Amendment)

APP (Appeal)

DUP (Duplicate)

PRV (Proposed revocation)

REC (Reconsideration)

REN (Renewal)

RIS (Re-issuance)

RTN (Returned)

Received Date: FEB - 2 2018]

Bio/LIE: []

Check Received: (Y/N)Amount: \$ 100.00Check# 4172Authorization: B (MBTA)
E (ESA)
I (Injurious- Lacey)
M (MMPA)
N (NDP)
W (WBCA)**PERMIT SPECIES:**Spec Code: _____ Status: _____
Quantity: _____Spec Code: _____ Status: _____
Quantity: _____Spec Code: _____ Status: _____
Quantity: _____Spec Code: _____ Status: _____
Quantity: _____Spec Code: _____ Status: _____
Quantity: _____Spec Code: _____ Status: _____
Quantity: _____Spec Code: _____ Status: _____
Quantity: _____Spec Code: _____ Status: _____
Quantity: _____**Purpose:**

M (Interstate commerce)

I (Import)

E (Export)

R (Re-export)

F (Foreign commerce)

T (Take)

FINAL STATUS:

ISS (Permit Issued)

LTR (Letter)

DEN (Denied)

ABN (Abandoned)

CAN (Canceled)

CLO (Closed)

EXP (Expired)

PDI (Partial denial/issue)

REV (Revoked)

RIS (Re-issued)

RTN (Returned)

SUS (Suspended)

WTH (Withdrawn)

Effective date: []

Expiration: 1 Year or _____

Amendment NO: _____

Report Required: Y / N

Report Due: _____/_____
(dd/mm)

Renewable: Y / N

May copy: Y / N

Regional Blanket: Y / N

Permit Conditions:**PERMIT TRACKING & MAILING:**

Reviewing Office	Date Sent	Date Received
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Aggregate(#):

AOSA _____ AOSA _____ AOSA _____

ABOP _____

APPLICANT**PERMIT MAILING:**

Date Mailed: _____ (Mailer's ini.)

REGMAIL- FEDEX - UPS- CPICK-
DHL- EXPMail- AIRB - PPICK- PRIORITY

Tracking Code: _____

Express Service Billing Info:

_____ Exp: _____

Mail to: Permittee or Other:

Date Tracked: _____

Tracker's Ini: _____

Fax: Permit or Letter Copy to:

FOLDER/PERMIT SET-UP:Folder Set-up: Green
Manila
CBW**Tab:**Dk. Orange - Dk. Grn -
Lt. Grn - Lt. Blue- Lavender
Pink - Red**Attach Permit Conditions:**WGEN · CIRC · PGEN ·
PAPPI · PESA · CBW ·
INJ1 INJ2 _____**CC Permit Copies:**APHIS-A · APHIS-P · DSA
OPS · ARDLE _____
ARDES _____ · TE · MMC
MMM · MA _____ · NMFS
_____S:\DMA\BOP\Handbook\Standard operating
procedures\07 - code sheets\FWS
Codesheet.rev11.doc**REVISED Feb. 2, 11**PRT NO: 154760
X-REF PRT NO: _____

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, Ph.D.
† JAMES G. TEER, Ph.D.
† BART O'GARA, Ph.D.
† DON LINDSAY
† BERT KLINEBURGER

BOARD OF DIRECTORS:
JOHN J. JACKSON, III, J.D.
CHRISSE JACKSON
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SHANE MAHONEY
RENEE SNIDER

January 16, 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: LA
5275 Leesburg Pike
Falls Church, VA 22041

Re: Applications for Import of Sport-Hunted Trophies

Dear Chief Van Norman:

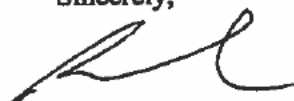
Enclosed please find the following:

- One application to import a sport-hunted African lion trophy hunted in Zambia in July 2017. This applicant hunted with Mangomba Safaris. The operator report for Mangomba is enclosed, and demonstrates the company's extensive commitment to anti-poaching, habitat protection, community investment, and responsible and sustainable wildlife management. For example, the company employs 25 anti-poaching scouts. They maintain a written concession plan with anti-poaching and community investment obligations. They contribute over \$51,000 to three Community Resource Boards for law enforcement and infrastructure projects, plus another \$5,882 to assist local villages in rehabilitating tourist camps for the villages' benefit. The company's ability to sustain these commitments largely depends on lion hunting. Half of the company's revenue comes from lion hunts, and almost all (95%) of their clients are U.S. hunters.
- One application to import a sport-hunted African lion trophy hunted in Zambia in July 2017. This applicant hunted with Baobab Safari Co. The company employs 30 anti-poaching scouts to patrol a large concession of 2,185 km². Their anti-poaching efforts have led to a visible increase in lion prey species over the past year, which suggests the local lion population may grow by up to 10%. The company contributes \$73,500 to the local Community Resource Board to assist with salaries for community scouts, infrastructure projects, and resource monitoring. Like Mangomba, half of the company's income comes from lion hunts, and almost all clients are American.
- One application to import a sport-hunted African lion trophy to be hunted in Zimbabwe in 2019.

The first two applications should be approved pursuant to the positive enhancement finding authorizing the import of African lion trophies from Zambia effective for the 2016, 2017, and 2018 seasons. However, if these applications need to be approved on a case-by-case basis, please consider the enclosed enhancement reports. With respect to the 2019 application, please consider these reports and the other documents submitted by Conservation Force and Zimbabwean authorities and operators in making a positive enhancement finding for this applicant.

Please do not hesitate to contact us if you have questions.

Sincerely,



3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

RCVD FEB 2 2018

December 28, 2017

U.S. Fish & Wildlife Service
Attention: Division of Management Authority (DMA)
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803

RE: Federal Fish and Wildlife Permit Application Form 3-200-20
Permittee Thomas Michael Zulim
African Lion – ESA-Threatened-Listed
Zimbabwe Deka Tails Safari Area, Hunting Season 2019

Dear Sir or Madam:

Accompanying this cover letter is my application for the above referenced African lion import permit for the calendar year 2019 hunting season. As noted in the application, the lion hunt will take place during the period August 1 through 18, inclusive, 2019, in Zimbabwe in the specifically noted Deka Tails safari hunting area.

Also, accompanying this application is (i) my check in the amount of \$100.00 for the application fee and (ii) a Notice of Representation designating representatives of Conservation Force as my attorneys and legal representatives for all matters concerning this application.

Please let me or the representatives at Conservation Force know if you have any questions or require any additional information.

Sincerely,



Thomas (b) Zulim

(b) (6)

Hockley, Texas (b) (6)

cc:

Conservation Force
3240 S. I-10 Service Road West, Suite 200
Metairie, LA 70001

Hunter International Brokerage Services, Inc.
5674 Stoneridge Drive, Suite 209
Pleasanton, CA 94588

NOTICE OF REPRESENTATION


This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted African lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed. 

Name: Thomas  Zulim

Date: December 28, 2017



Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

RCVD FEB 2 2018

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)
THREATENED - LISTED
AFRICAN LION

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name Zulim	1.b. First name Thomas	1.c. Middle name or initial (b) (6)	1.d. Suffix NA
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Attainment/ Doing business as (see instructions) NA
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 NA	
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information			
1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes) (b) (6)			
1.b. City Hockley	1.c. State Texas	1.d. Zip code/Postal code (b) (6)	1.e. County/Parish (b) (6)
2.a. Mailing Address (include if different than physical address; include if different than physical address) (b) (6)			
2.b. City Hockley	2.c. State Texas	2.d. Zip code/Postal code (b) (6)	2.e. County/Parish (b) (6)

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d)) CHECK ATTACHED. CHECK NO. 4172	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA30345C-0 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) 12/28/2017 Date of signature (mm/dd/yyyy)	

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (*Appendix I of CITES and/or ESA*)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/bv-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting, please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:

- a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

P.1. melanochaita (African lion)

- b. Sex (if known).

Male

2. IF ANIMAL IS CURRENTLY LIVING IN THE WILD, please enter the following:

- a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

See attached E.2.a.

- b. Date wildlife is to be hunted:

See attached E.2.b.

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

All parts, including skin, skull, teeth and claws.

3. IF THE ANIMAL IS DEAD, please enter the following:

- a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

NA

- b. Date wildlife was hunted:

NA

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

NA

- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

NA

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Andy Hunter
Business Name: Chipatani Safaris
Address: 8 Rivonia Road
Address: Mount Pleasant, Harare
City: Zimbabwe
State/Province:
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. ~~If you are a broker or taxidermist applying on behalf of a foreign national~~, provide documentation to show you have a ~~Power of Attorney~~ to act on your client's behalf and sign the following statement.

~~I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.~~

~~Taxidermist/Broker's signature: _____ Date: _____~~

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  _____ Date: 12/28/2017

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

I WILL USE A DESIGNATED PORT.

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

Same as indicated on page 1.

10. ~~If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.~~ **NA**

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Tom Zullin

(b) (6)

John L Jackson or Regina Lennox of Conservation Force
jjw-no2@att.net or regina.lennox@conservationforce.org
504-837-1233

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

USFWS PERMIT APPLICATION FORM 3-200-20: ZULIM, THOMAS (b) (6)

Attachment E.2.a.

The lion hunt will take place during the period August 1 through 18, inclusive, 2019, in Zimbabwe with the safari operator and in the safari hunting area noted below.

Nengasha Safaris

Country:	Zimbabwe
Operators Name:	Nengasha Safaris
Address:	36A Townsend Road, Suburbs, Bulawayo, Zimbabwe
Zimbabwe Tourism	
Operators HOP number:	0178
Area of hunt/place:	Deka Tails Safari Area, Zimbabwe
Land owners name:	Zimbabwe Parks and Wildlife Authority
GPS coordinates:	Latitude: 18 degrees, 53 feet, 82 inches South Longitude: 26 degrees, 70 feet, 19 inches North
Closest town:	Hwange Town, Zimbabwe
Area:	Matetsi Block, Zimbabwe
Region/Province:	Matabeleland North Province, Zimbabwe
Professional Hunter:	George Hallamore
PH license number:	144 (issued by Zimbabwe National Parks and Wildlife)

USFWS PERMIT APPLICATION FORM 3-200-20: ZULIM, THOMAS (b) (6)

Attachment E.2.b.

The lion hunt will take place during the period August 1 through 18, inclusive, 2019.

Attachment E.5.

- a. Please see the information previously provided to USFWS by Conservation Force, Buby Valley Conservancy, Save Valley Conservancy, and the Zimbabwe authorities, all of which are incorporated herein by this reference.
- b. Please see the information accompanying this application, and incorporated herein by this reference, prepared and previously submitted to USFWS by Zimbabwe Parks and Management Authority titled: *"Legal Trade, Conservation and Rural Livelihoods: a Zimbabwean Perspective; - L.W. Nyaguse"*.
- c. Please see the USFWS Enhancement Finding for Lions Taken as Sport-hunted Trophies in Zimbabwe during 2016, 2017 and 2018, dated October 11, 2017, all of which in incorporated herein by this reference.
- d. Please see the information accompanying this application, and incorporated herein by this reference, undated but pertaining to the hunt year 2017, by Paul Bernie, operator of the Deka Tail safari area in Zimbabwe.

USFWS PERMIT APPLICATION FORM 3-200-20: ZULIM, THOMAS (b) (6)

Attachment E.5.b.

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

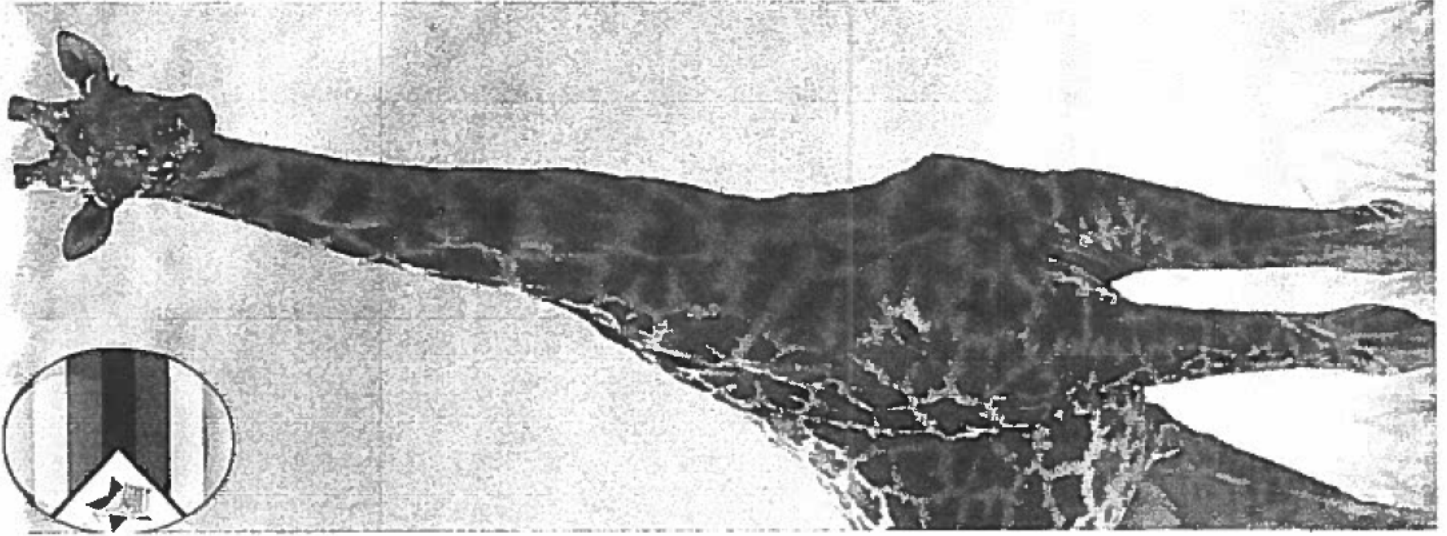


LEGAL TRADE, CONSERVATION AND RURAL LIVELIHOODS: A ZIMBABWEAN PERSPECTIVE: - L.W. NYAGUSE

AREAS TO BE COVERED

- Sustainable Utilisation
- Population Status of Key Species
- Quota Setting and CITES Quotas
- Quota Setting Considerations
- Legal Trade Framework
- Funding For Conservation
- Rural Livelihoods and Legal Trade
- How Does CAMPFIRE Work
- Community Benefits
- Revenue Generation
- Impacts of Community Benefits on Conservation





SUSTAINABLE UTILISATION

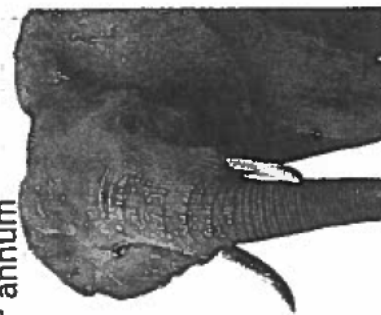
- Zimbabwe's conservation is based on the principle of sustainable utilisation, that the various species that are being conserved must contribute to conservation. This is the major source of funding for conservation.
- How successful has the concept been????
- Adaptive management is probably one of the most important concepts in the implementation of this philosophy.





POPULATION STATUS OF KEY SPECIES (ELEPHANTS)

REGION	1980	1983	1989	1993	1995	2001	2014	2001 vs. 2014
North-West	20 444	25 888	27 411	27 841	30 985	49 310	53 949	9.4% increase at 0.7% per annum
Matabeleland								
Zambezi Valley	10 152	9 907	13 029	14 361	16 842	19 297	12 211	36.7% decline at 2.8% per annum
Sebungwe	11 126	9 302	12 946	10 742	11 796	13 989	3 634	75% decline at 5.7% per annum
Gonarezhou	4 704	3 985	5 286	5 241	4 156	4 992	10 722	115% increase at 8.8 % per annum
TOTAL	46 426	49 082	58 672	58 185	63 779	88 123	80 516	8.6% decline at 0.7% per annum





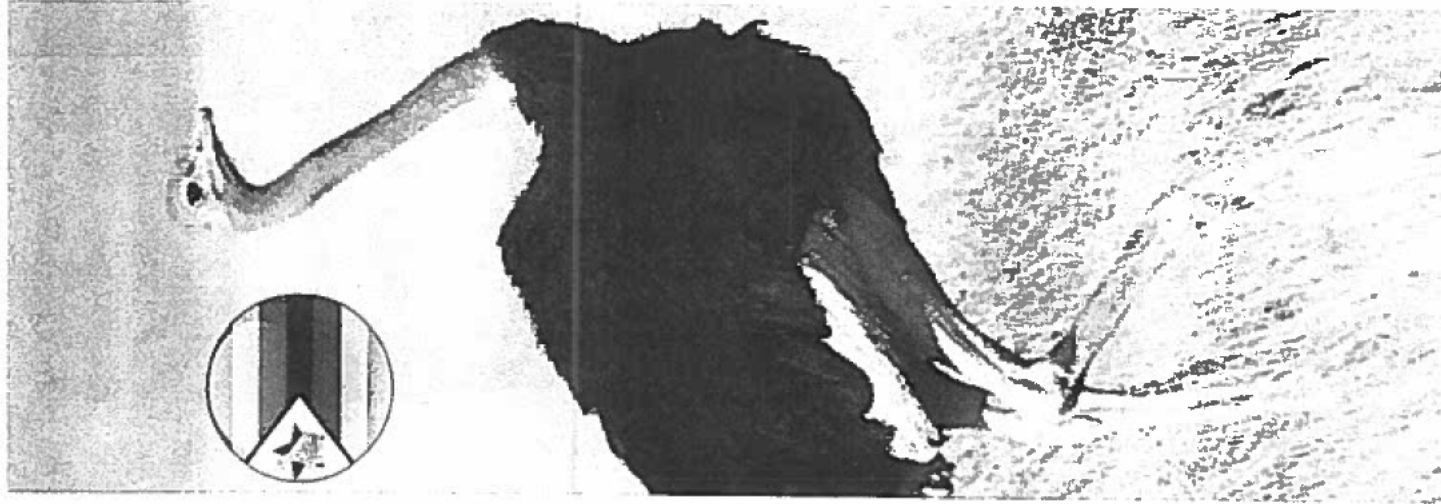
Quota Setting and CITES Quotas

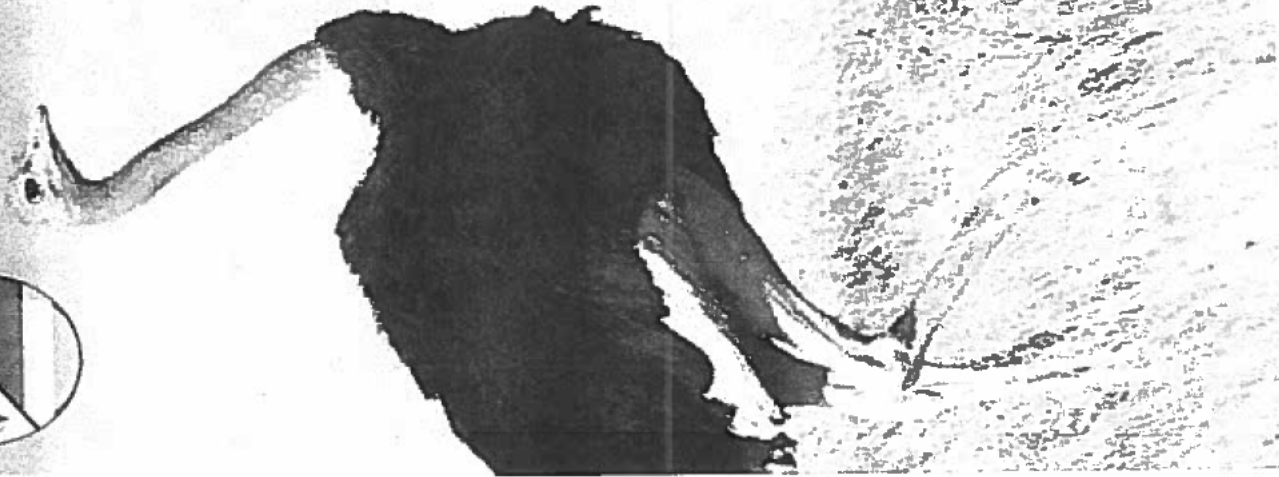
- A hunting quota is a scientifically determined system of harvesting animals from a population without compromising its biological proliferation.
- Hence, it is invariably the panacea of sustainable wildlife utilisation within hunting areas.
- In Zimbabwe determination and implementation of hunting quotas goes through a rigorous quota setting methodology that entails factoring population size, property (area) sizes, habitats, national policies among other parameters
- With all the set parameters met, it is anticipated that biodiversity and hunting industry are sustained and the economy improves as the country maintains its position as a leading wildlife destination.



Quotas and Quota Setting Considerations

1. CITES National Quota
2. National aerial survey results
3. Research publications and preliminary results
4. Off takes for key species including leopards, lion and elephant
5. Size of property relative to the species requested and distribution
6. Illegal Off-take/Poaching
7. Property based Ecological assessments
8. Management regime on the properties (habitat, fire, water, land-use planning and zonation, fencing, supplementary feeding).
9. Human wildlife Conflict hotspots, Communal Benefits and conflict mitigation
10. Species sensitivity
11. Other off-takes (illegal management offtakes, live sells)
12. Trophy Quality
13. Habitat Change/fragmentation
14. Recommended sustainable off-take levels
15. Offtake Data





Quota Setting and CITES Quotas

Species	CITES Quota
Elephant	500
Leopard	500
Crocodile	200
Cheetah	50

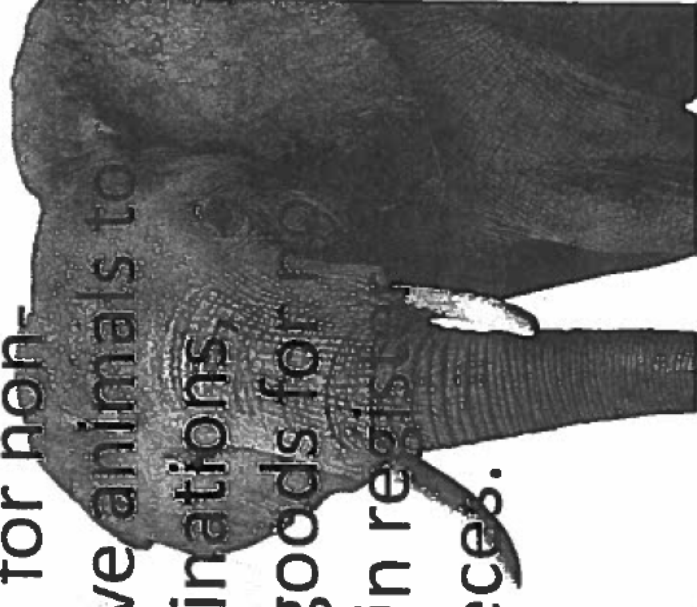




LEGAL TRADE FRAMEWORK



- Current CITES regulations on trade in elephant and elephant products for Zimbabwe have an annotation affecting Zimbabwe's population of *Loxodonta africana* on Appendix II which restrict trade in hunting trophies for non-commercial purposes, trade in live animals to appropriate and acceptable destinations, trade in hair, hides, and leather goods for non-commercial purposes and trade in registered raw ivory for whole tasks and pieces.



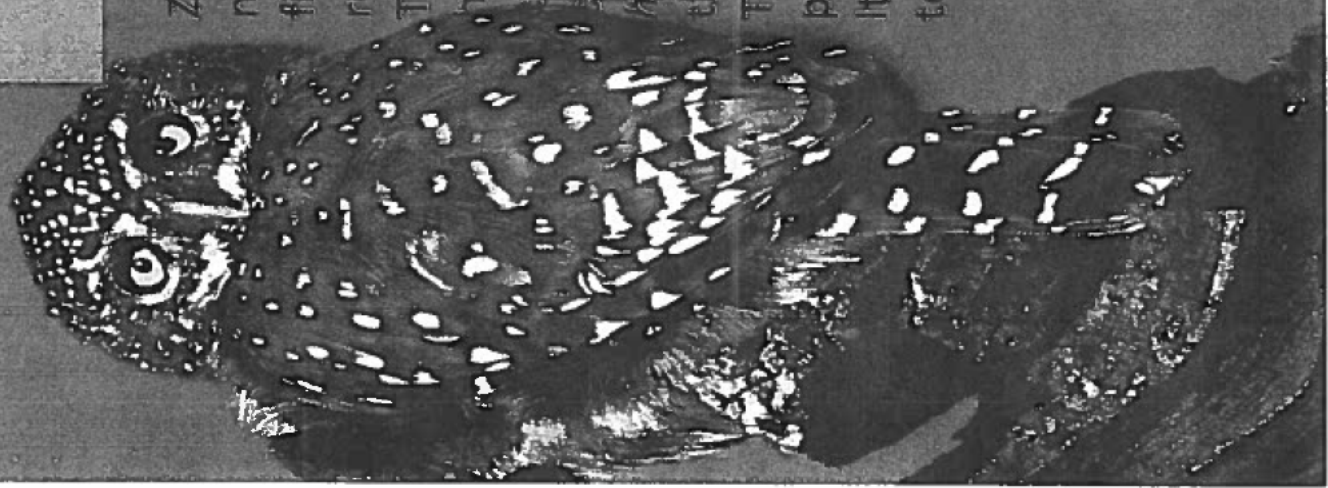
FUNDING CONSERVATION

Zimbabwe's Protected Area Management system is self-funding in nature. This means therefore that the resource protection budget is financed through the sustainable utilisation of the various wildlife resources therein.

The African Elephant is one of the biggest drawcard species from a hunting perspective, and is at the centre of all the major hunts in the country. Generally hunting contributed an average of USD22m to the country's GDP in 2014 and 2015 (*RBZ Exchange control report on hunting tourism in Zimbabwe*) and contributes about 20% annually of the Authority's revenue budget.

The annual offtake quota provided through CITES is for 500 elephants per annum.

It is the utilisation of these offtake quotas that contribute significantly to Zimbabwe's conservation budget.



FUNDING CONSERVATION



Zimbabwe's Protected Area Management Funding

	2013		2014		2015		2016		2017	
	Actual US\$		Actual US\$		Actual US\$		Budget US\$		Budget US\$	
REVENUE										
Granting Income	5,423,995		5,072,493				4,418,700		3,000,000	
Income of park products/live sales	515,509				810,000					
TOTAL Revenue	5,939,504		5,072,493				4,418,700		3,000,000	
EXPENDITURE										
Operational costs	5,766,886		6,071,981		5,123,926		7,525,500		4,000,000	
Staff costs	16,850,007		20,294,821		19,705,931		21,666,800		19,725,000	
Administration costs	2,558,886		3,244,961		2,922,619		2,004,900		2,000,000	
TOTAL EXPENDITURE	25,175,779		29,611,763		27,752,476		31,197,200		25,725,000	
SURPLUS/ DEFICIT	-19,236,275		-24,539,270		-23,685,847		-26,778,500		-22,725,000	





RURAL LIVELIHOODS AND LEGAL TRADE

- One of the biggest CBNRM initiatives in Zimbabwe is the Communal Areas Management Programme For Indigenous Resources (CAMPFIRE)
- CAMPFIRE has a combined 2.4 million beneficiaries, made up of 200,000 households that actively participate in the program, and another 600,000 households that benefit indirectly from social services and infrastructure supported by CAMPFIRE income within districts.
- There are in excess of 120 elected and constituted Village and Ward CAMPFIRE Committees that operate through specific Traditional Leaders in their areas. *'Communal' in the acronym CAMPFIRE, has since been changed to 'Community' in order to focus on communities instead of the geographic spread of the programme.*



HOW CAMPFIRE WORKS

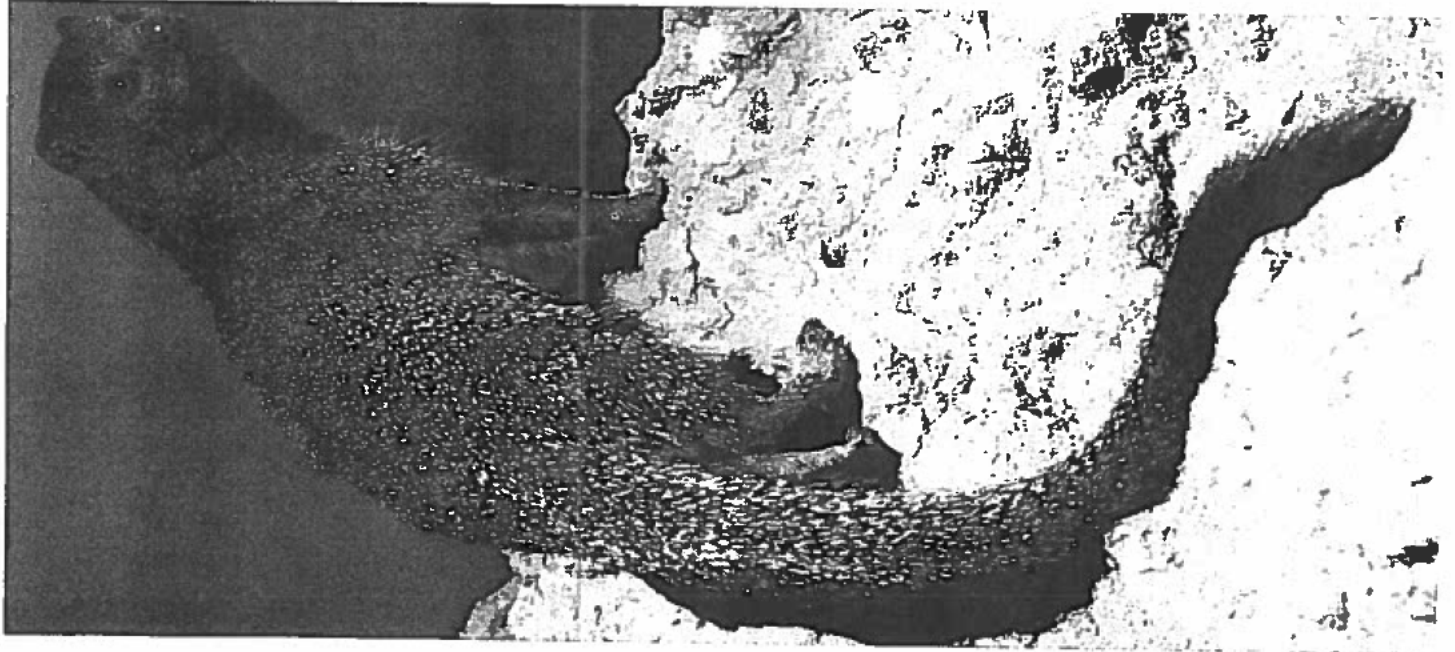


There are rural communities living adjacent or around most of Zimbabwe's National Parks or Protected Areas. These communal areas are under Rural District Councils (RDCs)

In the 1980s, the Zimbabwean government embarked on a Community Based Natural Resources Management Programme which would empower the rural communities to manage and utilise the natural resources in their districts.

To this end, the communities applied for and were given Appropriate Authority over their wildlife resources. This appropriate Authority meant that they could then embark on empowerment programmes for their own benefit.

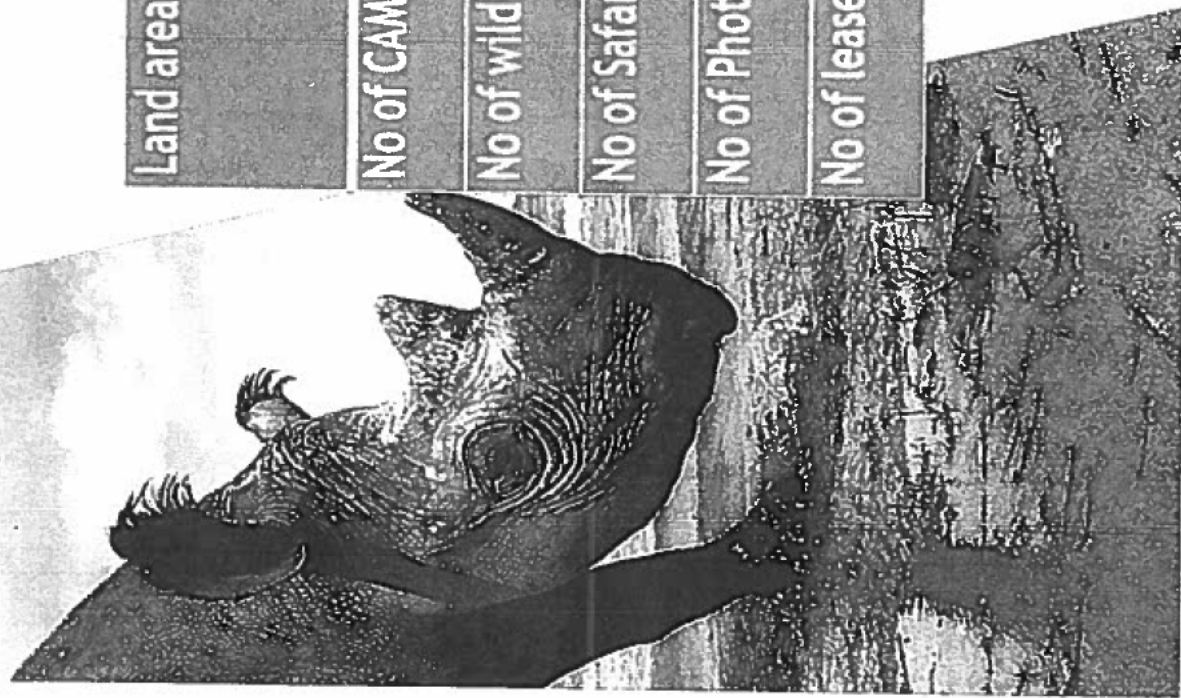
All these districts fall under the CAMPFIRE Association





CAMPFIRE AREAS

Land area under CAMPFIRE	50,000 km ² - 12% of Zimbabwe
No of CAMPFIRE Districts	58
No of wildlife districts	28 (15 active in hunting)
No of Safari Operators	33
No of Photographic safaris	10
No of leased Parks Safari Areas	4



COMMUNITY BENEFITS

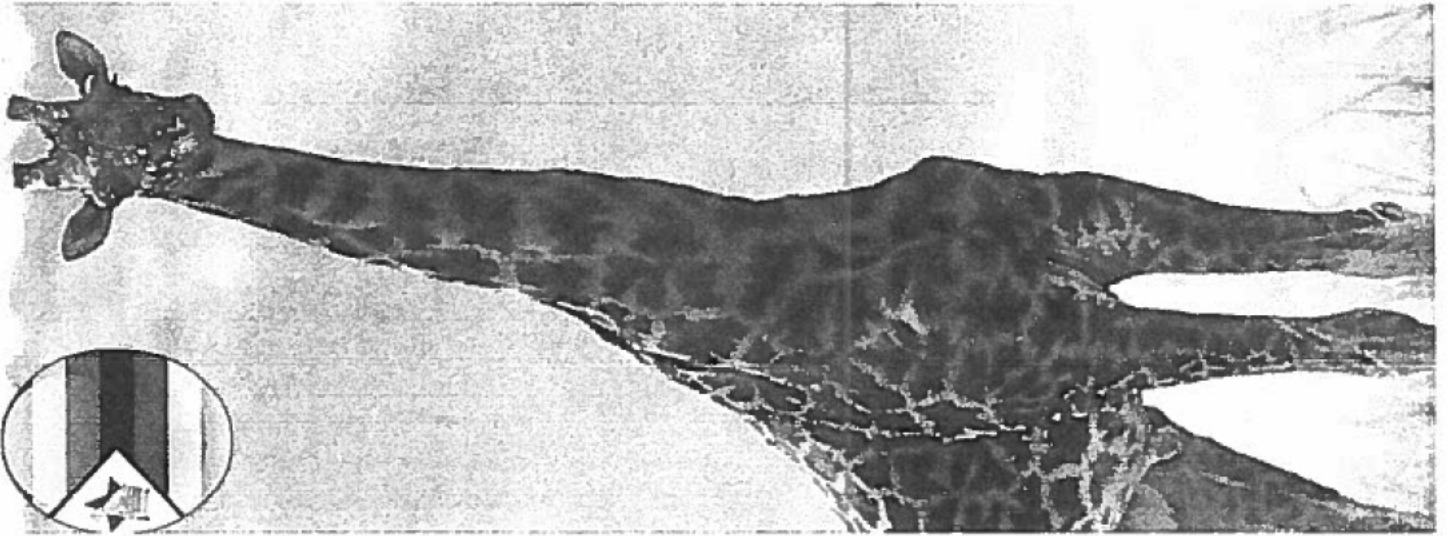


CAMPFIRE Revenue Sharing Guidelines are as follows:

- 55% of income is allocated to communities,
- 26% to the RDC to support costs attributable to CAMPFIRE activities,
- 15% for general RDC administration, and
- 4% as a levy to the Association.

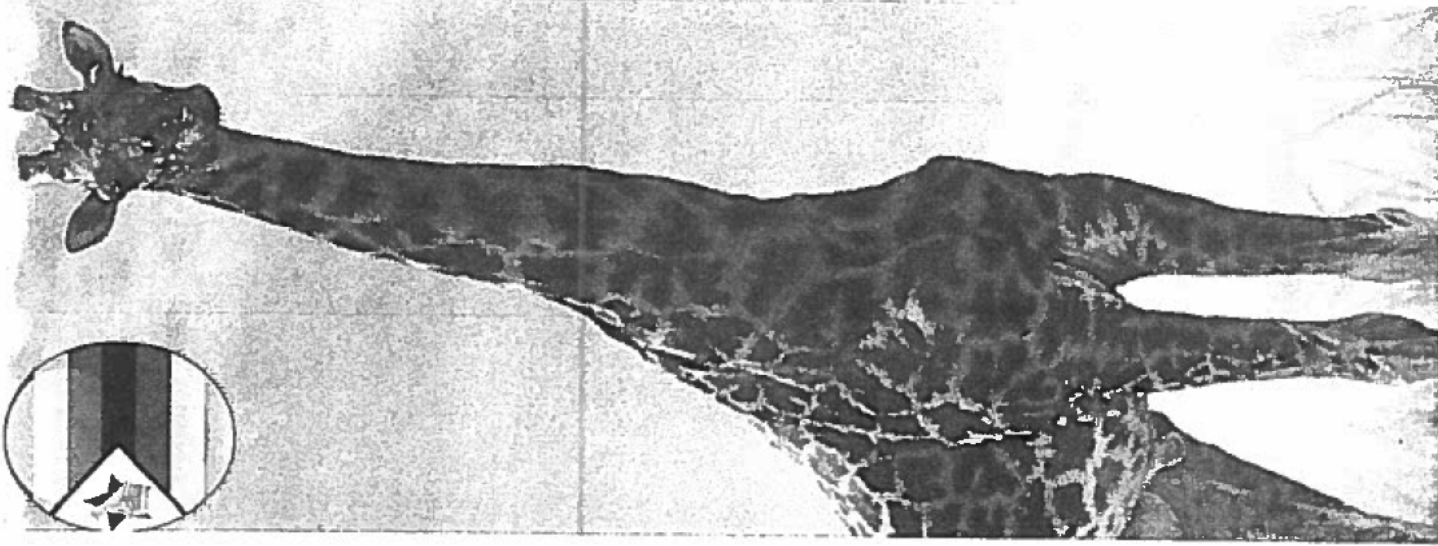
The 55% of income to communities is the minimum limit, which has been exceeded to 60% in Tsholotsho, as an example.





REVENUE GENERATION - HWANGE

YEAR	GROSS INCOME	COMMUNITY 55%	CAMPFIRE MGT 26%	COUNCIL LEVY 15%	CAMPFIRE ASS 4%
2009	32,500	17,874	8,450	4,875	1,300
2010	41,725	22,948	10,848	6,258	1,669
2011	63,070	34,648	16,398	9,460	2,522
2012	74,408	40,924	19,346	11,161	2,976
2013	65,300	35,915	16,978	9,795	2,612
2014	85,777	47,177	22,302	12,866	3,431
2015	49,350	27,142	12,831	7,402	1,974



REVENUE GENERATION IN CAMPFIRE AREAS

- On average CAMPFIRE generates nearly US\$2million per year. This means that communities in major CAMPFIRE areas receive about US\$1million every year in total. Since 2007, these communities have been opening their own bank accounts to receive cash from safari operators under a Direct Payment System. This system eliminates previous delays in money reaching the communities and ensures that communities see the value of wildlife.



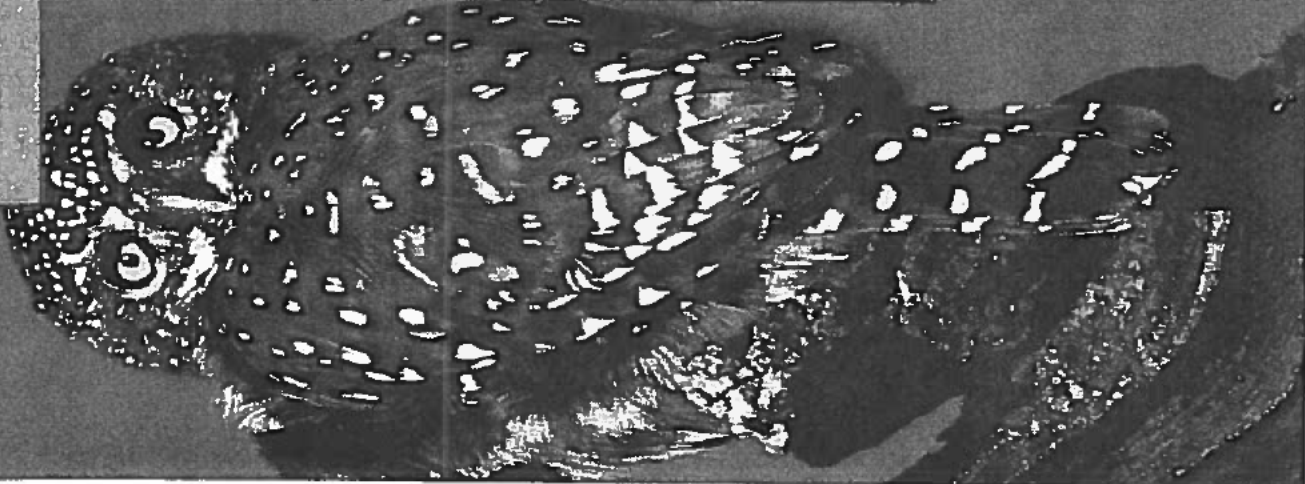
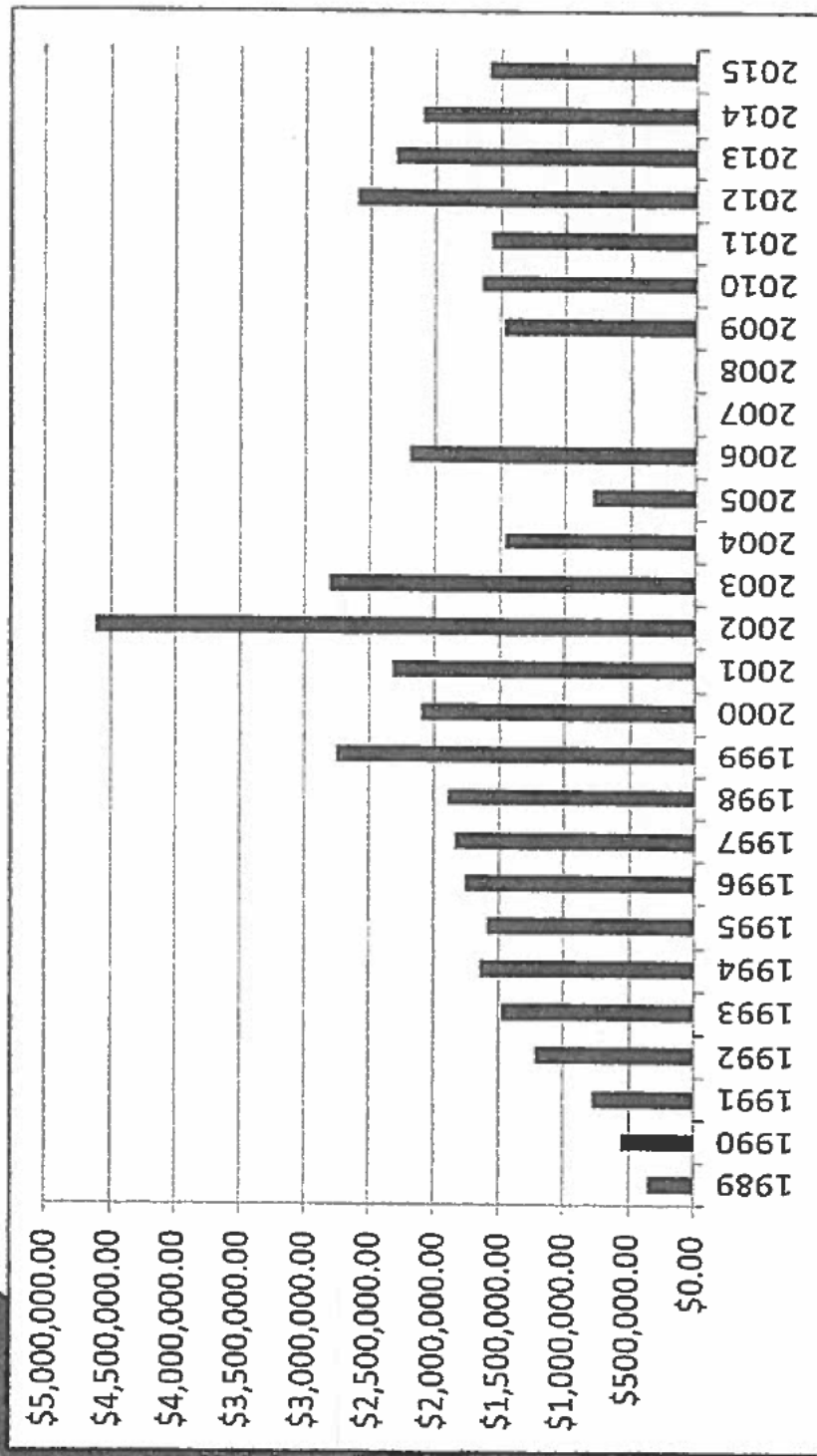


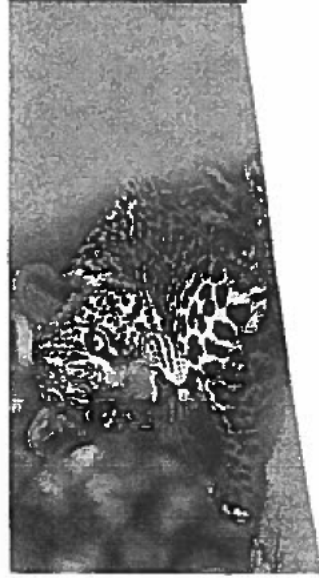
REVENUE GENERATION IN CAMPFIRE AREAS

e, CAMPFIRE as it is largely receipts from taxidermy, travel, extended tourism activities, food and others, are not captured as part of CAMPFIRE income. The proportion of safari operating expenses paid locally in the form of wages and salaries, and purchase of materials is also not recorded. Income from tourism ventures under CAMPFIRE is also mostly unrecorded, as a result of low investment and returns due to the current downturn in tourism receipts for the coun



REVENUE GENERATION – CONT'D

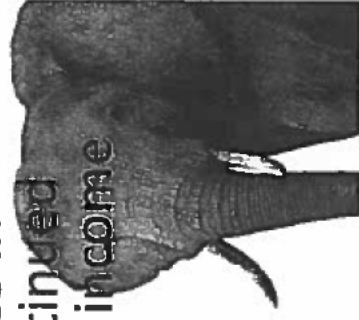




MODELS FOR REVENUE DISBURSEMENTS



- The gross amount disbursed to communities as dividends from 1989 to 2006 was US\$20,8million, representing 52% of the total income earned. Total income generated between 2009 and 2015 was US\$10,2million. The amount disbursed to communities was US\$5,5million, representing 54% of total income earned.
- American clients generally constitute 76% of hunters in CAMPFIRE areas for all animals hunted each year. The suspension of ivory imports from Tanzania and Zimbabwe by the United States of America (USA) in April 2014 resulted in the cancellation of 108 out of 141 (57%) elephant hunts initially booked by US citizens in 2014. As a result of the ban, CAMPFIRE income dropped by 14 million in 2014, compared to US\$2,3million in 2013, as leopard hunters conducted their safaris nevertheless in the absence of the lifting of the ban. However, the ban continued to result in a massive decline of total CAMPFIRE income to US\$2,6million.





Use of Income

- Revenue received by communities (about USD1 million annually) helps directly offset the costs of living with wildlife.
- Most communities have voluntarily invested in infrastructure which has long term benefits such as clinics, schools, and grinding mills.
- However, in some areas, the projects are spread too thinly to meet the needs of a growing number of people.
- Other communities have drilled boreholes, constructed seasonal roads, erecting of fencing to keep out wildlife, purchase of tractors, and direct purchase of drought relief food. Children benefit from reduced walking distances through the construction of schools, procurement of learning materials, and payment of school fees from CAMPFIRE proceeds.
- Communities also benefit from meat in excess of the requirements of safari hunting operations, and from problem animal control.



COMMUNITY PROJECTS FUNDED FROM CAMPFIRE REVENUE



District	Project
Beitbridge	Rehabilitation of schools, clinics and protection of irrigation schemes
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	Clinics, mothers waiting shelters, teachers' houses, primary schools, community-grinding mills, Police sub-office, piped water and electrification of clinic.
Hurungwe	Construction of classroom block - Nyamakate Secondary, Maintenance of Nyamakate bridge. Purchase of tractor tube, Payment of carpenters, Roofing Chipfuko Primary School and Huvo 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 building 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 tyres for ward tractor, Bridge maintenance
Mbire	Clinics, nurses houses, ward offices, storerooms, 14 classrooms, 7 teachers houses, grinding mills, school offices, wildlife administration offices, 2 hand pump boreholes, water piping, toilet, water storage tanks, 2 tractors, a basic tourist camp with 4 chalets;
Nyaminyami	Tillage tractors, renovation of dispensary at clinic, nurse's house. Construction of Mayovhe classroom block, 3 grinding mills, Teacher's house, Jongola school. School bursaries x 3 students at Seke Teacher's College. Renovation of pre-schools x 2. Negande: Rehabilitation of water pipeline, grinding mill. Nebiri: Chikuro primary block, rehabilitation of Harudziva water pipeline. Kasvisva: Rehabilitation of water pipeline to supply water to Kasvisva clinic, Kasvisva Secondary school block. Msampa: Teacher's house, Majazu primary, renovation of ward warehouse; Kanyati: Cement for teacher's house renovation.
Tsholotsha	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 Thembele primary school, Sikenite Clinic, Tshitatshawa and Jowa clinics construction, fencing of Madlangombe clinic, 10 water engines, borehole drilling and repairs and repair kits, Lister diesel engines for 6 villages in ward 21 and at Sihazela Line in ward 1, grinding mills, solar water pumping in wards 1, 2 and 4. 2 pickup trucks for wildlife monitoring purchased in 2015.

IMPACT OF COMMUNITY BENEFITS ON CONSERVATION



- Every time there is human-elephant conflict, the communities need to see that action is taken by the Authorities, either through compensation for loss and/or damage and through eliminating further potential threats. Any inaction by the Authorities usually results in communities taking matters into their own hands, to the detriment of the wildlife resources therein. However, where communities derive benefit and where there are locally designed and built-in mechanisms for compensation for the whole community through the utilisation of the resources, the communities tend to be more tolerant towards the animals.
- Elephant damage to Community Property includes the following;
 - Destruction of crops which affects both the quality and quantity of harvests and impacting negatively on food security;
 - Destruction of property;
 - Depletion of water sources;
 - Destruction of water infrastructure;
 - Reduced grazing land;
 - Restricted access to essential commodities such as firewood;
 - All this results in loss of property and opportunities to carry out other activities due to time spent guarding crops and property.



THANK YOU

MAZVTA!!!

Attachment E.5.c.



United States Department of the Interior



FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: 1A
Falls Church, VA 22041-3803

In Reply Refer To:
FWS/AIA/DMA

OCT 11 2017

Memorandum

To: The File

From: Chief, Branch of Permits 

Subject: Enhancement Finding for Lions Taken as Sport-hunted Trophies in Zimbabwe during 2016, 2017 and 2018

After evaluating the available information from the Government of Zimbabwe, other information available to the U.S. Fish and Wildlife Service (Service), and comments received from interested parties, the Service has determined that permits for the importation of sport-hunted trophies of wild lions (*Panthera leo melanochaita*), which are threatened under the Endangered Species Act (ESA), taken in Zimbabwe during the 2016, 2017, and 2018 calendar years meet the enhancement criteria under the Service's regulations at 50 CFR 17.32. Therefore, applications received for import of such specimens will be considered to have met this requirement. In accordance with the 4(d) rule for *P. l. melanochaita*, 50 CFR 17.40(r), the Service will review each application for import of such specimens on a case-by-case basis and each application will also need to meet all other applicable permitting requirements before it may be authorized. The Service will reassess the situation in Zimbabwe towards the end of the 2018 season to determine if hunts conducted in 2019 and beyond continue to meet the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the ESA was warranted and proposed a rule under section 4(d) of the ESA to provide conservation measures for the African lion. 79 Fed. Reg. 64472. On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the ESA) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under section 4(d) of the ESA, which is set forth at 50 CFR 17.40(r) (USFWS 2015; 80 Fed. Reg. 79999). The effective date of this listing is January 22, 2016. Therefore, as of January 22, 2016, the lion

subspecies *Panthera leo melanochaita*, whose range includes Zimbabwe, is listed as threatened under the ESA and is regulated under an ESA section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the ESA and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the ESA. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 50 CFR 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zimbabwe, but only if it first makes a finding that permitting the import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the ESA to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service has the discretion to make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on a countrywide basis, although individual import permits will be evaluated and issued or denied for each application. While the Service may make enhancement findings for sport-hunted trophy imports of *P. l. melanochaita* on a countrywide basis, the Service encourages the submission of information from individual applicants. We rely on the information available to the Service and may rely on information from sources other than the applicant when making a permitting decision.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits (50 CFR 17.32(a)(2)), but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita*, including sport-hunted trophies.

Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita*, the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In that review, we evaluate whether the import contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service will evaluate any application received that involves *P. l. melanochaita* in the context of enhancement of propagation or survival permitting in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

- (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
- (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
- (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
- (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
- (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
- (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita*. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita*:

(a) *Biological sustainability*: The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit*: The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit*: A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting*: Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (e.g., population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance*: A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Endangered Species Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentives*, if communities that share these resources with wildlife do not

perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

When evaluating whether the importation of a trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we will examine how a country's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we study a number of factors. Some of the factors we consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We consider whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32, we will examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We will also consider how a U.S. hunter's participation in the hunting program contributes to the overall management of lions within a country.

Management programs for *P. l. melanochaita* are expected to address, but are not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we will work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program would provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding for Lions in Zimbabwe:

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC)*

Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (IUCN SSC 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement finding for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe*, and subsequently, on November 29, 2016, provided a copy of *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe*. The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe. These documents, along with the Service's own final rule on the lion listing under the Act, as well as other relevant information from reliable sources and contained in comments received from interested parties, were the basis of this finding.

Governance of Lions in Zimbabwe: The legal framework for Zimbabwe's regulatory mechanism is informed by the Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas, for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). It is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of her natural landscape and scenery. The Parks and Wild Life Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Parks and Wild Life Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs, which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. It enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989. CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to improve community tolerance of wildlife, including lions. At the time, the

CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage and maintain Zimbabwe's wildlife resources and perform the service function with the primary role of protecting and conserving Zimbabwe's natural heritage for the present and future generations on behalf of the State. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from NGOs or other governments appears to be available.

A major component of ZPWMA's mandate is law enforcement. ZPWMA had 2,146 rangers at its establishment in 2002 (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD590,000 was spent on anti-poaching efforts by Bubye Valley Conservancy (BVC) alone during 2015 (K. Leatham, pers. comm., as cited in du Preez et al. 2016), and USD546,000 is spent annually on anti-poaching by Save Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (du Preez et al. 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD20,000 (ZPWMA 2014). Poaching mainly occurs along the boundaries of the protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016).

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonization of legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife. According to the ZPWMA *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe*, Zimbabwe has two established TFCAs, the Great Limpopo Trans-frontier Park (GLTP), which includes Gonarezhou National Park, and the Limpopo/Shashe TFCA. Additionally, there are other TFCAs that are in various stages of development, including Lower Zambezi-Mana Pools, Zimbabwe-Mozambique-Zambia (ZiMoZa), Chimanimani, and the Kavango-Zambezi (KAZA) trans-frontier conservation

area (TFCA) initiative, which links 52 million hectares of conservation areas between itself, Botswana, Zambia, Namibia, and Angola (ZPMWA 2016; Masterson 2016). Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

In addition to Zimbabwe's domestic laws, it is also a Party to CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zimbabwe provided a copy of their CITES non-detriment finding for lions. Their finding applied to all lion exports from Zimbabwe.

Current Lion Status in Zimbabwe: When the Service listed the lion in southern and eastern Africa as threatened under the ESA, three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to loss of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach et al. 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward et al. 2007). Outside of protected areas, the lion's prey base is much reduced (du Preez et al. 2016); inadequate management and law enforcement has led to poaching of the lion's prey base in Africa for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years, and for Zimbabwe droughts have been a critical factor (ZPWMA 2016). A reduced prey base results in a relatively greater chance of lions encountering livestock (du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoP17 *Consideration of Proposals for Amendment of Appendices I and II*, international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what the level of legal trade, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations

also occur on the state Forest Areas, Communal CAMPFIRE areas and private conservancies dedicated to wildlife-based land use. According to ZPWMA (ZPWMA 2016), there are approximately 319,317 km² of land where some form of wildlife based land use is practiced in Zimbabwe. Lions occur permanently in 45% of this available range (c. 145,000km²), with the majority occurring in national parks (96% of the all national parks) and safari areas (92% of all safari areas). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000km² and lions occur in 36% of these areas. Lion are transient in CAMPFIRE, conservancy and resettled areas adjacent to the major protected areas, and move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys will be done at two-year intervals in all wildlife areas, and lion call-up surveys will be done every three years in all major lion areas (ZPWMA 2014). The Service has not received confirmation that these surveys have been conducted since 2015.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 51,642km² of land where reliable survey data are available is approximately 1,900 (range 1,800 – 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (Save and Bulyebe) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies. Groom et al. 2014 used call-up surveys to obtain direct estimates of the lion population within Gonarezhou National Park and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016). From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100km² is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014).

To manage any population to ensure an appropriate population level and determine whether sport hunting is having a positive effect, it is vital to have sufficient data on population numbers and population trends on which to base management decisions. According to Riggio et al. 2013 (pg.32), and Bjorklund in Riggio et al 2013 (p.32), the minimum number estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the

only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe: In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states, "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in their 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe*, ZPWMA provides updates on the each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the ESA for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" has been broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. According to ZPWMA (2016), baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks. Active carnivore research programs conducted by NGOs and research institutions, such as WildCRU, are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The

quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, “human-lion related conflicts minimized and, where possible, eliminated” has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; Identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, “(t)he costs and benefits of long-term lion management equitably distributed,” is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implement a transparent mechanism to equitably distribute lion-related income to identified stakeholders.” The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and are in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange has been approved. However, the Service does not have a copy of this plan. With these updates, ZPWMA has made progress toward this output’s targets.

The strategy also identifies roles and responsibilities for a number of players in Zimbabwe’s lion conservation efforts. According to the strategy, there is a national lion coordinator that is to coordinate all national activities on lion conservation, research, and management including census surveys, setting up monitoring needs and coordinating data on human-lion conflicts. The strategy goes on to identify roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari-hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN SSC Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural

communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the “Long Shields Guardian Programme” was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the “Long Shields.” These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under The Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

Hunting and Utilization: Lions are infamously infanticidal (Schaller 1972, as cited in du Preez et al. 2016), which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2011), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, may be less of an issue in terms of sport-hunting if age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004).

The minimum number of lions that occur in approximately 51,642km² of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 – 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests average 2.7% of adult male lions annually. This percentage has decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

Trophy hunting of wildlife is permitted in safari areas, of which there are 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014). In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non-governmental conservation organization (du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe, were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016). According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further,

according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake.

Previously, Zimbabwe set quotas for the hunting of female lions. Between 1998 and 2004, Zimbabwe maintained a mean quota of $0.3 \pm 0.1/100 \text{ km}^2$ for female lions; during the same period, actual offtake was lower at $0.08 \pm 0.1/100 \text{ km}^2$, or a mean of 30.6 percent of the quota actually harvested (Loveridge et al. 2007). However, females are the most productive portion of a population; if they are removed from a pride, there is inherent risk that dependent cubs will die and the overall breeding success of the pride will be reduced. Zimbabwe discontinued issuing quotas for female lions in 2011 (USFWS 2015). In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, however, a precautionary quota will still be issued (ZPWMA 2014). The Service is not aware of how precautionary quotas are treated after they are issued, or if there is a protocol for obtaining necessary information when a precautionary quota is put in place.

ZPWMA (2016) mentions seven concessions that are leased on five-year terms, and how these concessionaires pay a five-year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016).

Between 1999 and 2004, data were collected in and around Hwange National Park that suggested that hunting surrounding the park was having a negative impact on the lion population. Therefore,

sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and is now estimated at over 550 animals (ZPWMA 2015).

CAMPFIRE is the program through which the Zimbabwean Government has developed the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however, according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016), only 16 are actively engaged in some form of wildlife-based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014). According to EcoWeb (2015), all income generated by trophy hunting in CAMPFIRE areas was distributed to communities (52%, when they are typically prescribed 55%), rural district councils (RDCs) (44%, when they are typically prescribed 41%), and the CAMPFIRE association (4%). Communities, rather than dividing income by households, typically invest in projects that benefit the communities as a whole, such as schools, clinics, and grinding mills. Councils use funding for patrols, monitoring of hunts, problem animal control, water, and fire management, while the CAMPFIRE association uses their funding to cover administrative costs and representation of the program (EcoWeb 2015).

As agreed upon at the 2013 lion management meeting in Harare, the CAMPFIRE areas in which lions occur are currently exempted from the age restrictions. This approach was adopted as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognizing the potential negative impacts the species has on the livelihoods of livestock farmers (ZPWMA 2016). According to ZPWMA's 2016 response, between 2010 and 2015, lions accounted for 2% of the total income generated from hunts conducted on CAMPFIRE lands and trophy fees accounted for 74% of the total funds generated for CAMPFIRE. Further, U.S. hunters accounted for 51% of the funds generated from hunting in CAMPFIRE areas during the same period. While hunting is allowed in CAMPFIRE areas, it is unclear if American sport hunters conduct lion hunts in these areas; if so, the Service is not aware if sport hunters are exempted from the age restriction in this case, and how this exemption in CAMPFIRE areas is taken into consideration when setting quotas for other portions of the country.

According to the Revised CAMPFIRE Revenue Sharing Guidelines, which were incorporated into the Constitution of the CAMPFIRE Association in 2007, at least 55% of generated revenue from hunting should be devolved to producer communities, no more than 26%, and 15% for management and overhead at RDC level, respectively, and 4% as a levy to the CAMPFIRE Association. According to an undated document (but presumably produced in late 2014, since it references data from 2014 but does not include any references to 2015 data) produced by CAMPFIRE (CAMPFIRE report undated) at least 10 RDCs comply with the Revenue Guidelines.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program – December 2016*, a report the Service received on December 17, 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, has established the Tourism Receipts Accounting System (TRAS) that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but required manual analysis of the data to extract information on hunting revenue. In January 2015, to account

fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, introduced the Tourism Receipts Accounting System (TRAS2) a web-based system (TRAS2) that links Safari Operators, ZPWMA Authority, Taxidermists, Shipping Agents, International Marketing Agents, and Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;
4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information was utilized in *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) to provide a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has proven the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria based on information available to the Service, we have been able to determine that sport-hunted lion trophies taken in 2016 and 2017 would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

Zimbabwe's lion hunting industry generated 9% of all sport hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport-hunting market in BVC and SVC during 2005-2015. Based on the information available to the Service, the participation of communities in CAMPFIRE has heralded a reversal in wildlife declines on private land. When the benefits of CAMPFIRE were extended to RDCs, it further aided in the equitable distribution of benefits from trophy hunting to local communities, which incentivizes them to conserve the African lion. In the case of SVC, without the hunting industry, these wildlife areas, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would not exist.

There was conflicting information presented to the Service on how many lions were included in the quota in 2015. du Preez et al. (2016) reports a national lion hunting quota of 85 with 39 hunted;

ZPWMA (2016) reports that the national lion hunting quota in 2015 was 82 lions, with 49 hunted. When evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km²; the 2015 offtake would have accounted for 0.125 lions/1,000 km².

Zimbabwe also has taken into consideration other best management practices, including age-based criteria for an adaptive management strategy, and takes past performance of hunting organizations into consideration when determining future quotas.

Further, sport hunting was essential for the successful transition of SVC from cattle to wildlife (du Preez et al. 2016), in that it provided monetary benefits for the conservation of lions and local communities. BVC donates over 45 tons of meat from sport hunting to the local communities each year. This meat donation is worth over USD100,000 per year. BVC also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda, and Jopempe. The local community sees a direct benefit from the wildlife in BVC, but is also empowered by job opportunities created both with these community projects, as well as on BVC (du Preez et al. 2016).

While Zimbabwe's hunting industry generated approximately 8 million in 2015, not all of this is connected to lion hunting or to U.S. hunters. However, lions are a key component of the hunting industry since they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Based on the information available to the Service, the funds generated by hunting trophies contribute to the ZPWMA's ability to manage the country's lion populations as well as the success of CAMPFIRE. It appears that without the hunting industry, it would not be economically viable to maintain lions. Although U.S. hunter participation in lion hunts is not enough to make or break the industry, U.S. hunters have played a significant role in the industry in Zimbabwe, previously making up 51% of all hunting in Zimbabwe and 72% of lion hunts within the country. As such, the removal of their participation could have a long-term negative impact.

Further, through the *Strategy and Action Plan*, Zimbabwe has put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the *Strategy and Action Plan*, and revise our finding as appropriate.

Therefore, based on the information available to the Service, and provided that the reserve where the lion was taken was properly permitted and in compliance with national and local regulations, the purpose for which a permit being requested is adequate to justify removing lions from the wild or otherwise changing their status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares, and represents 27% of the total surface area of the country. Of this, 7.9 million

hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. With the CAMPFIRE program, private landholders and RDCs are given the opportunity to benefit from the wildlife on their land, including lion, and incentivize them to conserve the species. Sport hunting of lions by U.S. hunters supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserve the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge et al. 2007, Whitman et al. 2004).

Based on the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Although prior to 2011, Zimbabwe allowed the hunting of lionesses and males under 5 years old, they made significant changes to ensure their hunting program is sustainable. In 2011, Zimbabwe restricted the hunting of female lions. In 2013, they proposed an adaptive age-based quota-setting process. In 2015, the development TRAS2 allowed the country to assess regional price differentials of similar hunts and the reasons thereof; present TRAS2 system updates and reports to the users, including international marketing agents; engage with international marketing agents of sport hunting; obtain relevant insights on governing of the hunting sector; and come up with an effective mechanism to fully account for export proceeds from the hunting sector.

According to CITES trade data and Service records, from 2011 to 2016, there were 223 lion trophies imported to the U.S. from Zimbabwe. Best practice would be to import only male lions, as pointed out by Macdonald (2016), but Zimbabwe has already taken the initiative by placing a moratorium on lioness hunting. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season begins, and results in poor quality trophies and young animals being hunted, has also been abandoned (du Preez et al. 2016). Zimbabwe appears to be transparent in their implementation of the age-based adaptive management strategy (USFWS 2015). The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (du Preez et al. 2016).

Between 2005 and 2015, the U.S. market has represented over 90% for the sport-hunting market in both BVC and SVC. If this market was effectively lost due to an inability of prospective clients to import their trophies, it would become unviable to continue managing BVC as a wildlife area in its current form (du Preez et al. 2016). Across all CAMPFIRE districts, from 2010 to 2015, there was a total quota of 140 lions, with actual offtake equaling 45 animals. During this same period, U.S. sport hunters apparently accounted for 51% of Zimbabwe's sport hunting clients; trophy fees represented 74% of CAMPFIRE income, of which lions play a small role. In 2015, lion sport hunting generated USD753,000 in revenue, which accounted for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

Evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. The hunting areas are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

Provided that the off-take of lions continues to be monitored and the actions identified in the Strategy and Action Plan continue to be implemented, the participation of U.S. hunters in lion hunts would provide an indirect benefit to wild populations by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the Strategy and Action Plan. The issuance of import permits for lions legally hunted under these authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. If import permits for sport hunted lion trophies from Zimbabwe were to be issued, it would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport hunting opportunities for hunters in CAMPFIRE districts would help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of import permits for legally hunted lions does not conflict with known conservation programs and rules.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

With limited, controlled off-take of lions in a manner that would maintain sustainability, the legal hunting activities that U.S. hunters would be involved in would contribute to reducing the threat of extinction of lions. This off-take must be monitored to ensure that it is sustainable and that, to the extent possible, normal lion behavior and ecology are not negatively impacted. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* will ensure the long-term survival of lions. The utilization of hunters to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe.

Therefore, based on the information available to the Service, the issuance of import permits for legally hunted lions does not conflict with known conservation programs and rules.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

While, over the years, ZPWMA has failed to generate adequate revenue for its operations, U.S. sport hunters play a large role in the hunting industry of Zimbabwe. The Service anticipates that by granting the importation of sport-hunted lion trophies, there would be an increase in funds provided to Zimbabwe's conservation initiatives through this program by U.S. sport hunters. ZPWMA has also been forthcoming in involving relevant stakeholders as well as independent researchers and non-governmental organizations in determining best management practices.

Therefore, based on the information available to the Service, Zimbabwe has the proper expertise, facilities, and other resources to accomplish the objectives laid out in their *Strategy and Action Plan* to enhance the propagation and survival of the species, partly through the utilization of funds generated by U.S. hunters' participation in lion hunts throughout the country.

Conclusion

Given the current status of lions within Zimbabwe and the level of management and oversight provided to them, the Service is able to find that the harvest and import of sport-hunted trophies of lions within Zimbabwe meet the purposes of the ESA. As stated earlier, each application received by the Service for the import of a sport-hunted trophy lion from Zimbabwe will be evaluated on a case-by-case basis. The applicant must have hunted on a properly licensed hunting area within Zimbabwe. The Government of Zimbabwe must continue to implement the *Strategy and Action Plan* in the manner identified in the documents. The on-going adaptive management and limited off-take of lions is important to the survival of lions in Zimbabwe and the Service will reassess lion management within Zimbabwe and whether the importation of sport-hunted trophies enhance the survival of the species at the end of the 2018 hunting season or at which time substantive information becomes available to the Service in the interim.

Although the Service is able to make a finding that the management of lions within Zimbabwe meet the enhancement criteria under the ESA, there are certain documents and data the Service needs to evaluate in order to continue our current finding past the 2018 hunting season. The Service expects to be able to review data from the 2016, 2017, and 2018 hunting seasons to assess the lion populations and ensure that management efforts are enhancing the propagation and survival of the lion within Zimbabwe. Given that Zimbabwe's last management plan for lion was produced in 2006, the Service would like to see an updated plan established. Local management plans, such as the Management Plan for Hwange National Park will be sought. Although Zimbabwe has made progress on their 2006 *Strategy and Action Plan*, the Service will seek updates on further progress of the outputs or targets not yet accomplished. Lastly, the Service will also seek an update on the quota setting process. Specially, we will need further information on the establishment and implementation of precautionary quotas.

Therefore, with the information currently available to the Service, the Service is able to make a determination that the import of lions taken in Zimbabwe in 2016, 2017 and 2018 would meet the issuance criteria under 50 CFR 17.32. In accordance with the 4(d) rule for *P. l. melanochaita*, 50 CFR 17.40(r), the Service will review each application received for import of such specimens on a case-by-case basis and each application will also need to meet all other applicable permitting requirements before it may be authorized.

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Attachment E.5.d.

36A Townsend Road

Suburbs

Bulawayo

Zimbabwe

Tel: +263 9 231329 Fax: +263 9 231329

Email: nengasha@gatorzw.co.uk or kaluga@yoafrica.com

Application To US FWS For Importation Of Trophy Lion From Zimbabwe.

Area of hunt – Deka Tail Safari Area. This is a Zimbabwe National Parks and Wildlife safari area which Nengasha Safaris has a 10 year lease. The area has a 50km boundary with Hwange National Park. At present we have 2 trophy lions on hunting quota.

Income from the lion hunts contributes a major percentage of the total turnover to the safari operation. We have a full time anti poaching team operating throughout the area at considerable expense. We have not only been able to control poaching but without doubt the numbers of wildlife in the area have increased considerably over the past 7 years.

We have also invested in better water supplies , improved roads and fire breaks. In summary the area is well managed with good conservation practices in place.

We also work closely with National Parks at Sinamatella and assist them with fuel and transport to deploy their scouts both in the Park and in the adjoining safari areas.

Simply put without income from lion hunting we would be forced to curtail our anti poaching operations and this would be extremely detrimental to wildlife populations in the area.

Without control in an area the wildlife can be destroyed quickly – within 2 years it would be decimated.

In summary it is paramount we are able to market and export trophy lion into the USA in the interests of conservation.

Wildlife only survives in Africa if it has a value placed on it –

Attachment E. 5. d. 4 pages

we would therefore request you consider this application to import a trophy lion from our area into the USA in a favourable light.

Please find attached our hunting permit for this year reflecting the 2 lion on quota. Once permits are issued for next year we can furnish you with them.

Regards

Paul Bennie.

NEPTUNE Feet 10



ORIGINAL
VALID AS AUTHORITY TO HUNT

ZIMBABWE PARKS AND WILDLIFE
MANAGEMENT AUTHORITY
HUNTING PERMIT
PARKS AND WILDLIFE ACT [CHAPTER 20:14]

PCA:.....
PCA 100
Amount paid \$250
Rec No. H10R067214
Date 23/01/17

(payment details)

10 **Nengasha Safaris**

of **Deka Tail Safari Area**

and co-hunter

Firstly to hunt in Hunt Number or Section Deka Tail Safari Area of the Mat North

Area such number of animals as is indicated in column "A" below against the name of

the animals specified. Such hunting shall be conducted during the period extending between 01-01-17

and _____

Animal	A	B	Animal	A	B	Animal	A	B
Baboon	✓	20	Guinea fowl	✓	150	Pigeons/ Doves		150
Buffalo male	✓	6	Giraffe (m)	✓	1	Porcupine		✓ 2
Bushbuck m	✓	3	Impala(f)	✓	10	S. Hyena		✓ 3
Bushig	✓	2	Impala(m)	✓	10	Sandgrouse		✓ 50
Civet	✓	1	Jackal	✓	2	Serval		✓ 1
Duiker	✓	3	Klipspringer (m)	✓	3	Waterbuck (m)		✓ 1
Elephant (m)	✓	3	Kudu (f)	✓	3	Warthog (m)		✓ 4
Francolin	✓	150	Kudu (m)	✓	8	Wildcat		✓ 2
Genet	✓	2	Leopard (m)	2	1	XXXXXXXXXXXXXXXXXXXXXXXXXX		
Grysbok(m)	✓	5	Lion (m)	✓	2			

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.

This permit is issued strictly subject to the terms and conditions which appear on the reverse.

—Date stamp of authority which
—issue the permit

for and on behalf of the Director General, Parks and Wild Life Management Authority

(Designation) _____

for Finance Manager
for and on behalf of the Director General, Parks and Wild Life Management Authority

Designation... A AIRTEL - 400021

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Page: 12244

2017年12月11日

2017年12月11日


RCVD FEB 2 2013

(b) (6)

December 28, 2011 Date

Pay to the Order of U.S. Fish and Wildlife Service \$100.00

One hundred dollars and 00/100 Dollars

 **PROSPERITY BANK***
WALLER BANKING CENTER
31250 FM 2920 • WALLER, TX 77464
936-372-0404 www.prosperitybankusa.com

(b) (6)




Photo Safe Deposit* Details on back

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A FORCE FOR WILDLIFE CONSERVATION

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† JAMES G. TEER, PH.D.
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January 26, 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

RCVD FEB 05 2018

Re: Applications for Import of Sport-Hunted Lion Trophies

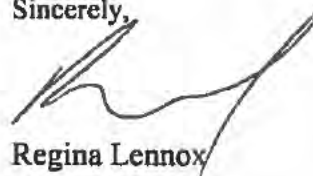
Dear Chief Van Norman:

Enclosed please find two applications to import sport-hunted lion trophies. One applicant hunted in South Africa in November 2017. This lion was hunted in the APNR, which is designated as a "wild" lion population (see attached email). We respectfully request that this permit be approved subject to the FWS' consideration of positive enhancement information already provided by the Department of Environmental Affairs of South Africa.

The second applicant hunted in the Buby Valley Conservancy in Zimbabwe. Buby Valley and Conservation Force have submitted extensive documentation about this area. We respectfully request that you consider this information and the non-detriment findings and other information provided by Zimbabwe's Parks and Wildlife Management Authority in making a positive enhancement finding for this application.

Please do not hesitate to contact us if you have questions.

Sincerely,



Regina Lennox

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed lion trophy from Africa.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: _____

 (b) (6)

Name: _____

KEITH (b) (6) RIGGS

Date: _____

1/22/2018



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

RCOD FEB 05 2018

LB

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES Threatened-listed
(Appendix I of CITES and/or ESA) lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name Riggs	1.b. First name Keith	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Social Security Number (b) (6)		5. Affiliation/ Doing business as (see instructions) N/A	
3. Telephone number (b) (6)		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 N/A		1.b. Doing business as (dba)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information			
1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes) (b) (6)			
1.b. City Magnolia	1.c. State Texas	1.d. Zip code/Postal code (b) (6)	1.e. Country USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)			
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. Country/Province
2.f. Country			

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 767644 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in Chapter B of Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature (In block print of applicant/person responsible for permit (No photocopied or stamped signatures)) Keith Riggs Date of signature (mm/dd/yyyy) 1/17/2018	

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/bv-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
P. l. melanochaita (African lion)
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
Bubye Valley Conservancy, Masvingo Province, Zimbabwe
 - b. Date wildlife is to be hunted:
June 11 - 28, 2018
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
Skull and skin (full life sized skin including claws)
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
 - b. Date wildlife was hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:
Business Name: Trophy Consultants International
Address: 4 Josiah Chinamano Road
Address: Belmont
City: Bulawayo
State/Province:
Country, Postal Code: Zimbabwe

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information provided by Conservation Force, Buby and Save Valley Conservancies, Zimbabwe authorities, CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below) **safari operators, and others**


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: 1/22/2018

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).
9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):
10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.
- ☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.
11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Attorneys at Conservation Force, 504-837-1233, cf@conservationforce.org
12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?
- ☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

32-61 1918
1110

(b) (6)

DATE January 17, 2018

PAY TO THE ORDER OF U.S. Fish and Wildlife Services \$ 100.00

One hundred and 00/100 DOLLARS

CHASE
JPMorgan Chase Bank, N.A.
www.Chase.com

ESA THREATENED LISTED LION

(b) (6)

MP

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, Ph.D.
† JAMES G. TEER, Ph.D.
† BART O'GARA, Ph.D.
† DON LINDSAY
† BERT KLINEBURGER

BOARD OF DIRECTORS:
JOHN J. JACKSON, III, J.D.
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January 26, 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041

RCVD FEB 05 2018

Re: Applications for Import of Sport-Hunted Lion Trophies

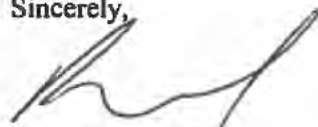
Dear Chief Van Norman:

Enclosed please find two applications to import sport-hunted lion trophies. One applicant hunted in South Africa in November 2017. This lion was hunted in the APNR, which is designated as a "wild" lion population (see attached email). We respectfully request that this permit be approved subject to the FWS' consideration of positive enhancement information already provided by the Department of Environmental Affairs of South Africa.

The second applicant hunted in the Buby Valley Conservancy in Zimbabwe. Buby Valley and Conservation Force have submitted extensive documentation about this area. We respectfully request that you consider this information and the non-detriment findings and other information provided by Zimbabwe's Parks and Wildlife Management Authority in making a positive enhancement finding for this application.

Please do not hesitate to contact us if you have questions.

Sincerely,



Regina Lennox



Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Threatened-listed lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name Stone	1.b. First name Gregory	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number (b) (6)	6.b. Alternate telephone number NA	6.c. Fax number NA	6.d. E-mail address (b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution N/A	1.b. Doing business as (dba) NA		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information				
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)				
1.b. City Reno	1.c. State NV	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province	1.f. Country USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) same as above				
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 10US18492A/9 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature (in blue ink) of applicant responsible for permit (No photocopied or stamped signatures) (b) (6) Date of signature (mm/dd/yyyy) 12/20/2017	

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (*Appendix I of CITES and/or ESA*)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least 90 days for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting, please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
Panthera leo melanochaita
 - b. Sex (if known).
Male
2. IF ANIMAL IS CURRENTLY LIVING IN THE WILD, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
 - b. Date wildlife is to be hunted:
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
3. IF THE ANIMAL IS DEAD, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
Republic of South Africa, Limpopo, Lat: 24;9;23.00999/Long: 30; 51; 23.02000/Farm Excellence/Phalaborwa
 - b. Date wildlife was hunted:
11/25/2017

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

Fullskin, complete skull-teeth, flying bones, claws

- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

Lifeform Taxidermy, 7 Aluminum St, ext 8, white river, 124G, Republic of South Africa

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Life Form Taxidermy
Business Name: Life Form Taxidermy
Address: 7 Aluminum St, EXT 8
Address:
City: White River
State/Province:
Country, Postal Code: Republic of South Africa, 124G

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information submitted by Conservation Force and range states authorities and operators.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: N/A Date: _____

7. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  (b) (6)  Date: 12/20/2017

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).
9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):
same as listed on page 1
10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.
☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.
11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Conservation Force/3240 S. I-10 Service Road W, Suite 200
Metairie, Louisiana 70001 USA (504) 837-1233 CF@CONSERVATIONFORCE.ORG
12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?
☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III, Regina Lennox, and other attorneys of the non-profit law firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed African lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that Conservation Force be copied with all correspondence, acknowledgements, notices, and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
cf@conservationforce.org

Signed: _____

Name: _____

Date: _____

(b) (6)

Gregory

Gregory

Stone

Stone

12/21/17

Duration of Hunt: Commenced 25 / 11 / 2017 Terminated 28 / 11 / 2017

Post Permit to (Mark correct block with X)

HUNTING OUTFITTER

[illegible][illegible]

Address to which invoices are to be sent: <u>Little Horn, David Armstrong, 7 Alumnium St. Elys, White River</u>	
Code: <u>1246</u>	Country: <u>USA</u>
Trophy Export Date (Estimate): <u>June 1964</u>	
Total: _____	
Conservation Levy	

Copies:	Client	Original	White	Forward to Nature Conservation Authority where hunt took place
		1st Copy	Pink	
	Hunting Outfitter	2nd Copy	Blue	Retain for a period of three years
	Taxidermist	3rd Copy	Green	
	Professional Hunter	Last Copy	Yellow	Taxidermist
				Remains in book

NB: Voluntary conservation contributions for every trophy taken would be appreciated. These funds go towards wildlife conservation, the upliftment of communities, research projects and many more.

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.

Regina Lennox <regina.lennox.cf@gmail.com>**Fwd: South Africa Lion permit to US**

3 messages

Greg Stone (b) (6)
To: regina.lennox@conservationforce.org

Fri, Jan 19, 2018 at 3:21 PM

Hi Regina

Just got this from the outfitter for my lion. Hope it helps with my application. Please let me know if there is more information I can provide. Have a nice weekend!

Greg

-sent from my iPhone

Begin forwarded message:

From: "Wayne & Tao Wagner" <wagnersafaris@yebo.co.za>
Date: January 18, 2018 at 5:41:02 AM PST
To: "Greg Stone" (b) (6)
Subject: RE: South Africa Lion permit to US

Hi Greg,

Hope that you are well. It is no problem asking for information regarding the lion exportation, we would like to assist you where we can to export the lion trophy to the States.

I have attached a map that indicates the property (Farm Excellence) and the surrounding reserves, i.e. Balule Nature Reserve which are members of the APNR. You will notice that the Farm Excellence KT157 and Excellence's neighbour to the north west – Hoofpyn 269KT – are included on the map although the properties are not formally part of Balule. We have not reached an amicable agreement to join Balule but the properties are separated only by the Olifants River giving the wild lions free roam of the reserves and the two properties as mentioned above.

A part of Excellence is unfenced with Balule Nature Reserve (APNR) and the remaining portion of Excellence & Hoofpyn are fenced but the wild lions roam freely over all these properties. There is a blacktop road to the west of Excellence and Hoofpyn that basically forms the borders of the APNR. The same wild lions that roam Balule Nature Reserve and the APNR roam on Excellence and Hoofpyn.

I again confirm that the lion permit applied for on the Farm Excellence & Hoofpyn was a exportable lion and not a DCA permit.

I hope that this is helpful, please let me know if there is anything else we can assist you with.

Kind Regards
Wayne Wagner

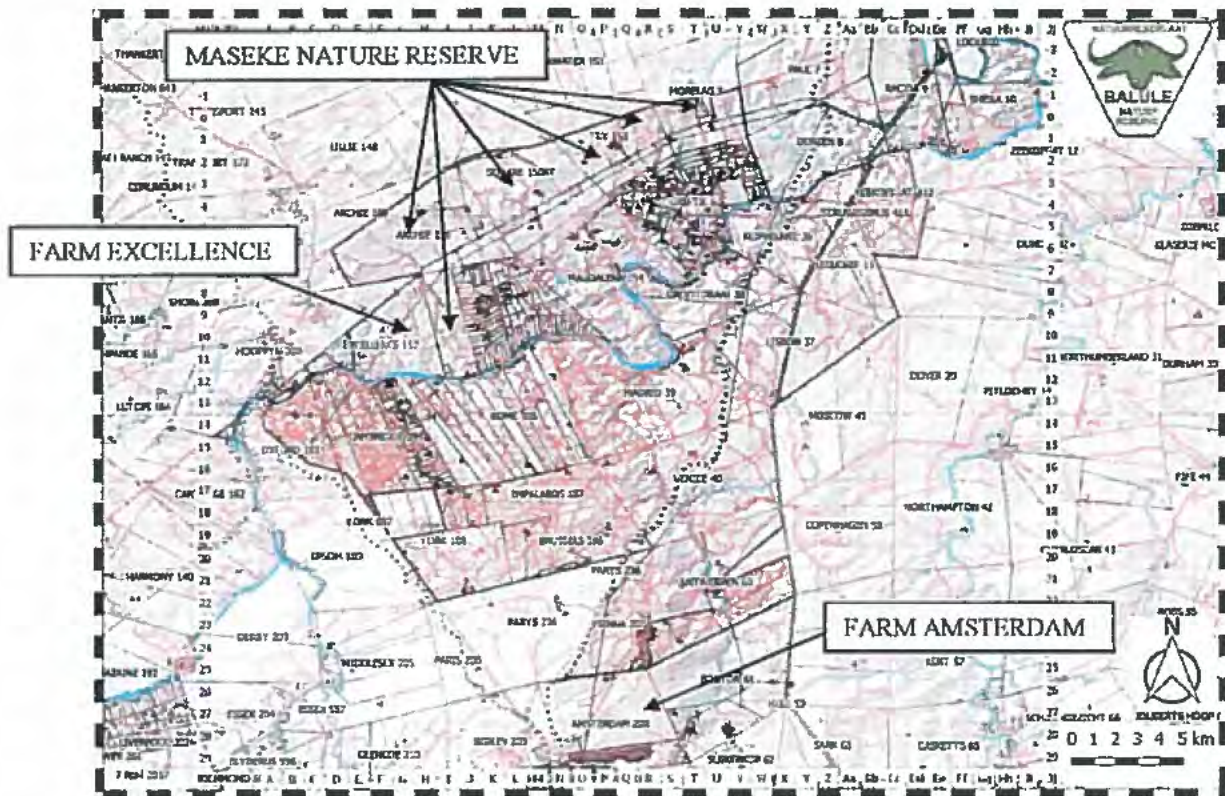


This email has been checked for viruses by AVG antivirus software.
www.avg.com



GREG STONE LION EXPORT MAP.pdf
414K

**APPENDIX A: NEW AREAS INCLUDED INTO BALULE NATURE RESERVE
THAT REQUIRE VELD CONDITION ASSESMENT AND SURVEY AS PER APNR
ROUTINE.**



(b) (6)

Pay to the
Order of

US First ad buildt Service 12/20/17
One hundred and seven dollars - \$100 -

Date
(b) (6)



Charles Schwab Bank
Reno, Nevada

For

[Signature]

High Yield Investor Checking



[Signature]

MP

(b) (6)



Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name <i>Ahern</i>	1.b. First name <i>Jane</i>	1.c. Middle name or initial <i>(b) (6)</i>	1.d. Suffix <i>(b) (6)</i>
2. Date of birth (mm/dd/yyyy) <i>(b) (6)</i>	3. Social Security No. <i>(b) (6)</i>	4. Occupation <i>(b) (6)</i>	
5. Affiliation/ Doing business as (see instructions) <i>(b) (6)</i>			
6.a. Telephone number <i>(b) (6)</i>	6.b. Alternate telephone number <i>(b) (6)</i>	6.c. Fax number <i>(b) (6)</i>	6.d. E-mail address <i>(b) (6)</i>

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (dba)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title		6. 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) <i>(b) (6)</i>			
1.b. City <i>Alpine</i>	1.c. State <i>TX</i>	1.d. Zip code/Postal code: <i>(b) (6)</i>	1.e. Country <i>USA</i>
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) <i>(b) (6)</i>			
2.b. City <i>Alpine</i>	2.c. State <i>TX</i>	2.d. Zip code/Postal code: <i>(b) (6)</i>	2.e. Country <i>USA</i>

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <i>[Signature]</i> <i>2/11/18</i> Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)	

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Lion, Panthera Leo

b. Sex (if known).

Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

Zimbabwe, Matetsi 4, Controlled by National Parks, Victoria Falls, Zim

b. Date wildlife is to be hunted:

July 21st - Aug 10th 2018

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

Life size mount

3. **IF THE ANIMAL IS DEAD**, please enter the following:

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

b. Date wildlife was hunted:

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:
4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: *Richard Cooke*
Business Name: *Richard Cooke Safaris (25 years in business)*
Address: *representing: Power Zimbabwe (PVT) LTD (holder of operator license)*
Address: *653 reynard road*
City: *Victoria Falls*
State/Province:
Country, Postal Code: *Zimbabwe*

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  _____ Date: *2/1/18*

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your proposed activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

James L. Ahern,

(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.

James (b) Ahern, (6)

Dear Tim,

It was great to meet you @ the show this year. Thank you for fielding all the questions from Rick and I. We are both very interested in anything that has to do with the outdoors. Please let this letter serve as additional information for #5 in the Federal Wildlife Permit Application included in this envelope. As you know the area I am applying for (Matetsi) was involved in a 5 yr. moratorium on Lion hunting while a study was conducted. The findings of this study by "Wild Cru" was that Lion populations in Zimbabwe and more specifically in the Matetsi areas along with Winge National Park and the surrounding Forestry areas is on the increase. Further, a finding of the study was that the 5 yr moratorium was not needed and that now they may have more Lions than the area can actually support without harming the other wildlife. I personally hunted in Matetsi 5 in 2017 and saw 2 males, 7 female, 3 cubs in only 3 days of being there. The man that runs Swarovski Optik USA told Richard and I that he filmed 50-80 Lions in a 10 day hunt that occurred in Matetsi 3 in 2017. The Matetsi areas 1-7 are considered to be the highest concentration Lion Population in Zimbabwe. The National Park team monitors the age on any Lion taken in the area and will reduce an areas quota if a Lion is taken under 5 yrs old. The area I am applying for has 1 Lion on quota for 2018 (Matetsi 4). Part of the \$25,000 trophy fee I will pay goes to National Parks to improve the habitat

James (b) Ahern, (6)

for Lion. With the money they will dig bore holes or water wells to provide more water for the Lions. They will also build fire breaks with motor graders to prevent the Lions habitat from being destroyed by wild fire that so often occurs in the area. The final thing they use the money for is anti poaching efforts which benefit all wildlife in this great area. These three conservation efforts are considered to be the most effective way to help the African Lion.

I personally have helped Lion conservation efforts in Tanzania by buying 2 hunts that included 21 days with a Lion permit. I did not take a lion on either hunt so if allowed to hunt this area in Zimbabwe I will have paid considerable money to help the African Lion. I have never had a game violation in either the United States or Africa and have been hunting since I was 6 years old. I am 42 years old on Feb 15, 2011.

Richard Cooke has been in business 25 years and his whole life is fishing, hunting, and conservation of the fish and game animals. Richard has a perfect record and has never had a violation of a game law in either Africa or the United States.

Please consider me for a US Fish and Wildlife Service CIP permit for the great African Lion. My Best,



(b) (6)

(b) (6)

Date 2/23/18

Pay To The Order Of

U.S. Fish & Wildlife Service \$ 100.⁰⁰

One hundred dollars

Dollars

Security features
are visible
only on back.



Frost National Bank

San Antonio, Texas 78296
www.frostbank.com

#76460C

For

Application Fee

[Signature] MP

(b) (6)

RCVD MAR 7 2018

Ahern

(b) (6)

Alpine TX

(b) (6)

NORTH HOUSTON TX 773

02 MAR 2018 PM 5 L

U.S. Fish & Wildlife Service
Attn: Ms. Anna Barry
5275 Leesburg Pike
Falls Church, VA
22041-3803

22041-380375



† BARON BERTRAND DES CLERS, Ph.D.
† JAMES G. TEER, Ph.D.
† BART O'GARA, Ph.D.
† DON LINDSAY
† BERT KLINEBURGER

BOARD OF DIRECTORS:
JOHN J. JACKSON, III, J.D.
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January 31, 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

FEB 9 2018

Re: Applications for Import of Sport-Hunted Lion Trophies


Dear Chief Van Norman:

Enclosed please find two applications to import sport-hunted lion trophies. One applicant will hunt in Namibia in July 2018. Namibia has a growing lion population, and some of the communal conservancies have accepted lion to increase available habitat and reduce human-lion conflict. This applicant is hunting in a communal conservancy supporting over 1,000 people.¹ We respectfully request that you consider the enclosed information on Namibia's conservancies and the information available on the NACSO website, www.nacso.org.na, as well as information received from the Ministry of Environment and Tourism, in making a positive enhancement finding for this applicant.

The second applicant is hunting in the Deka Safari Area in Zimbabwe in 2019. Deka is a state Safari Area, and his trophy fees and other fees will go to benefit lion management by funding the Zimbabwe Parks and Wildlife Management Authority. We respectfully request that you consider the information and the non-detriment findings provided by the Parks and Wildlife Management Authority and Conservation Force in making a positive enhancement finding for this applicant.

Please do not hesitate to contact us if you have questions.

Sincerely,



Regina Lennox

¹ <http://www.nacso.org.na/conservancies/balyerwa-conservancy>

FEB 9 2018

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed lion trophy from Africa.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: _____

Name: _____

Date: _____



Jonathan Ulrich

01/23/2018



Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)


FEB 9 2018
Threatened - Listed Lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1. a. Last name Ulrich	1. b. First name Jonathan	1. c. Middle name or initial (b) (6)	1. d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions)
6. a. Telephone number (b) (6)	6. b. Alternate telephone number	6. c. Fax number (b) (6)	6. d. E-mail address (b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1. a. Name of business, agency, Tribe, or institution		1. b. Doing business as (dba)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4. a. Principal officer Last name	4. b. Principal officer First name	4. c. Principal officer Middle name/ initial	4. d. Suffix
5. Principal officer title		6. Primary contact name	
7. a. Business telephone number	7. b. Alternate telephone number	7. c. Business fax number	7. d. Business e-mail address

C. All applicants complete address information				
1. a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)				
1. b. City Cleburne	1. c. State TX	1. d. Zip code/Postal code (b) (6)	1. e. County/Province	1. f. Country USA
2. a. Mailing Address (include if different than physical address; include name of contact person if applicable)				
2. b. City	2. c. State	2. d. Zip code/Postal code	2. e. County/Province	2. f. Country

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)
	Date of signature (mm/dd/yyyy) 1/29/18

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera Leo, Lion

Melanochaita

b. Sex (if known).

Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

Namibia, Caprivi Strip, Balyerwa Conservancy, Katima Mulilo

b. Date wildlife is to be hunted:

Estimated July 19, 2018

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

Life Size Mount

3. **IF THE ANIMAL IS DEAD**, please enter the following:

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

b. Date wildlife was hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: PH Jan Malonie or Gunter Schwalm
Business Name: Balyerwa Conservancy
Address:
Address:
City: Katima Mulilo, Namibia
State/Province:
Country, Postal Code: 9000

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  _____ Date: 1/29/18

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

Jonathan Ulrich

(b) (6)

Cleburne, TX (b) (6)

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Attorneys at Conservation Force, 504-837-1233, CF@conservationforce.org

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.



Namibian Association of CBNRM Support Organisations

NACSO connects the communities and organisations that manage and conserve Namibia's natural resources

19 Lössen Street
PO Box 98353
Windhoek
Namibia

Tel: +264 61 230888
Fax: +264 61 237036
nacso@iway.na

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[Home](#) » [Balyerwa Conservancy](#)

Balyerwa Conservancy

Region: Zambezi

Population: 1 091

Area km2: 223

Date registered: October, 2006

Address: PO Box 629, Ngweze

Telephone: 081-3630908

Geographical features: A mosaic of woodland and grassland. The average annual rainfall is 600 mm

Unusual or important features:

Kwando River, Mamili National Park on southern border and Mudumu National Park on northern border.

Major wildlife resources:

Elephant, hippo, kudu, buffalo, leopard, bush pig, duiker, warthog, black-backed jackal, lion, spotted hyaena, crocodile, plains zebra, interesting bird life, tiger fish, catfish, various tilapia fish species.

Management:

Management Committee of eight men and one woman; wildlife monitoring using annual count on foot and Event Book monitoring system.

Quick links

Ministry of Environment
and Tourism (MET)
website

MET regional offices

Photo Library



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members

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LAC

NDT

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MRCC-UNAM

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Government Agencies

Where we are

Location of...



Website by JARO Consultancy

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the state of community conservation in Namibia



A summary of the annual report

2016

The full report may be downloaded at
www.nacso.org.na and is available at
the NACSO office in Windhoek.

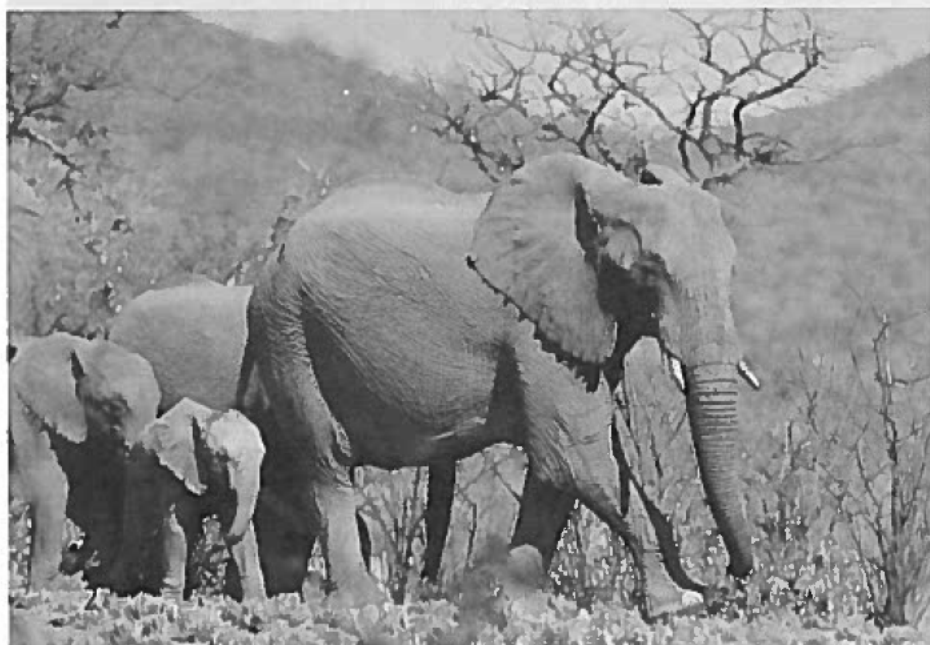


Living with wildlife

Community Conservation in Namibia

... means striving for balanced land use and a healthy environment. Wildlife — and all natural resources — can be utilized sustainably and integrated with other rural livelihood activities for the benefit of the people and the land...

Community conservation is about managing natural resources sustainably to generate returns for rural people. Conservancies, community forests and other community conservation initiatives create the necessary legal framework for this. By choosing to live with wildlife, rural communities are broadening their livelihood options as well as enabling a healthier environment. Through wise and sustainable management and use, natural resources are conserved for future generations while providing significant returns today.



Community conservation in Namibia

At the end of 2016 there were...

- 82 registered communal conservancies
- 1 community conservation association in a national park (Karas Association – managed like a conservancy)
- 19 concessions in national parks or on other state land held by 23 conservancies (some conservancies share concessions)
- 32 registered community forests
- and 2 community fish reserves in Namibia

What's being achieved?

Community conservation...

- covers 165,182 km², which is about 52.8% of all communal land with an estimated 195,258 residents (another approximately 5,752 members of the Karas Association live in Bwabwata National Park)
- of this area, conservancies manage 162,030 km², which is 19.66% of Namibia
- community forests cover 30,828 km², 89.9% of which overlaps with conservancies
- community rangeland management areas cover 4,004 km², much of which overlaps with conservancies
- from the beginning of 1990 to the end of 2016, community conservation contributed about N\$ 5.98 billion to Namibia's net national income
- during 2016, community conservation generated over N\$ 111 million in returns for local communities
- community conservation facilitated 5,147 jobs in 2016
- 57 conservancies had a total of 164 enterprises based on natural resources
- community conservation supports wildlife recoveries and environmental restoration
- Namibia's elephant population grew from around 7,500 to around 22,800 between 1995 and 2016
- Namibia has an expanding free-roaming lion population outside national parks

The biggest challenges?

- countering the increasing threat from commercial poaching and trafficking of rhino and elephant parts
- countering international pressure to ban Namibia's legal consumptive use of wildlife
- increased local poaching due to drought
- countering growing financial mismanagement
- a levy imposed by the Ministry of Lands and Resettlement, which could render joint-venture lodges financially unviable
- award of prospecting and mining licenses without due consideration to biodiversity and social issues

CBNRM

Community Based Natural Resource Management

The earliest community-based conservation initiatives in Namibia, which have today developed into a national CBNRM programme, started before independence when the first community game guards were appointed by local headmen in an attempt to reverse wildlife declines. At the time, wild animals were seen as little more than a threat to crops, livestock and infrastructure, and to community safety. Furthermore, people living in communal areas had been denied their traditional rights to utilize wildlife.

Ground-breaking legislation passed in the mid-nineties laid the foundation for a new approach to natural resource use. By forming legally-recognized community conservation organizations such as conservancies and community forests, people in communal areas can now actively manage natural resources and generate returns from them. This continues to encourage wildlife recoveries and environmental restoration.

The first conservancies were registered in 1998 and the first community forests in 2006. The Kyaramacan Association was founded in 2006 within Bwabwata National Park and is treated as a conservancy by NACSO. While community conservation organizations are resource management units and businesses, they are also defined by social ties uniting groups of people with the common goal of conservation.



1990



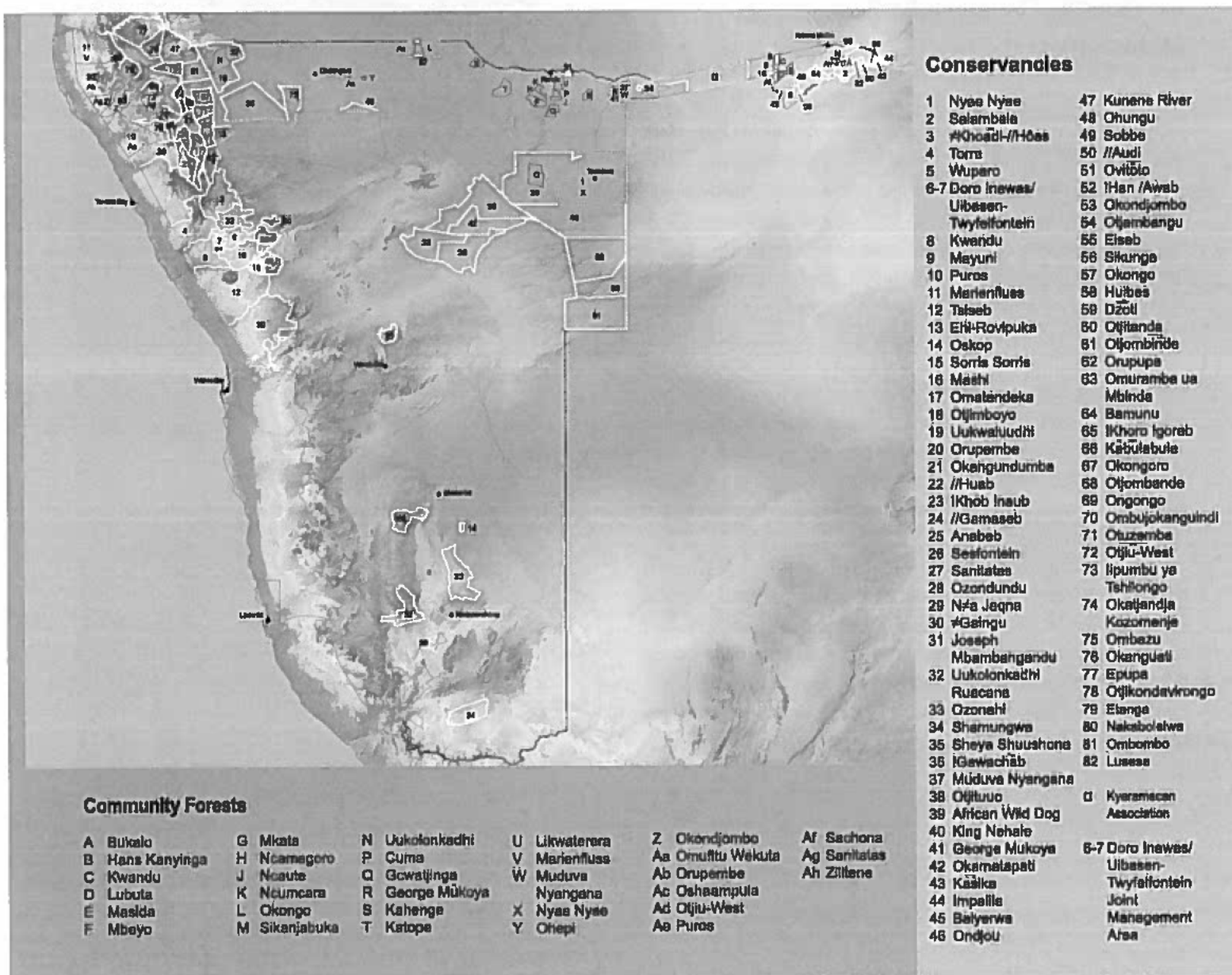
2016

The expansion of structured natural resource management across Namibia

At independence in 1990, there were no registered community conservation areas, freehold conservancies did not exist, and a mere 12% of land was under recognized conservation management. At the end of 2016, land under structured natural resource management covered 43.7% of Namibia.

The distribution of conservancies and community forests across Namibia

At the end of 2016, there were 82 registered communal conservancies and 32 registered community forests in Namibia and one community association in a national park, covering 165,182 km². [The lists below follow the chronological sequence of registration]



The benefits of community conservation

Community conservation has shown that it can improve rural lives while contributing to biodiversity conservation, and is recognized as a national development strategy. Many conservancies are showing that conservation can generate a broad range of community and individual returns (see graph) while covering their operational costs from their own income.

Community conservation can become fully sustainable and largely self-financing in the foreseeable future, provided that appropriate resources continue to be invested to entrench governance foundations, optimize returns, and mitigate threats and barriers to development.

Three pillars of community conservation in Namibia

Institutional development

Good governance creates the basis for resource management and the equitable distribution of returns



Natural resource management

Innovative resource management enables biodiversity conservation and the sustainable use of wildlife and plant resources

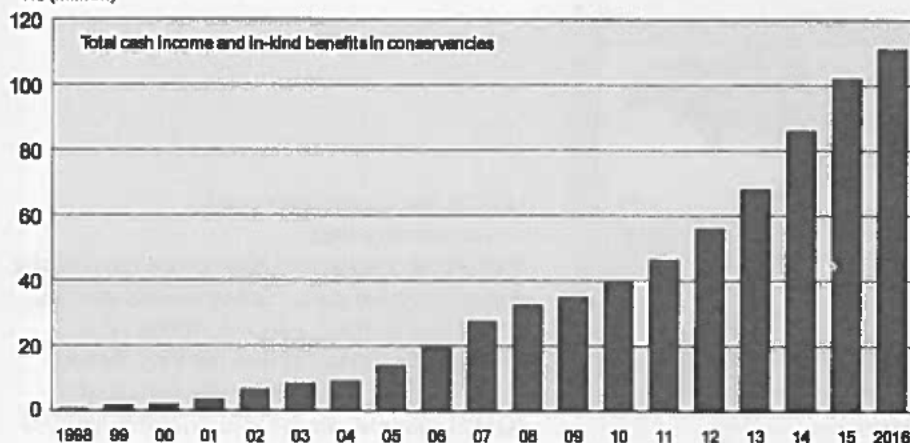


Business, enterprises and livelihoods

Incentive-based conservation approaches enable an expanding range of rural livelihood options



N\$ (million)



Total returns to conservancies and members
The total cash income and in-kind benefits generated in conservancies (including the Kyaramacan Association) grew from less than N\$ 1 million in 1998 to more than N\$ 111 million in 2016. This includes all directly measurable income and in-kind benefits being generated, and can be divided into cash income to conservancies (mostly through partnerships with private sector operators), cash income to residents from enterprises (mostly through employment and the sale of products), and as in-kind benefits to residents (mostly the distribution of harvested game meat).

Building Foundations

...means creating structures that enable wise and effective governance which empower rural people to control their affairs and resources for a common, sustainable good...

Democratic, effective governance

Resources can only be used sustainably if effective management structures exist to guide their use.

Before independence, rural communities were disenfranchised and the absence of a sense of ownership over resources led to their neglect and indiscriminate exploitation.

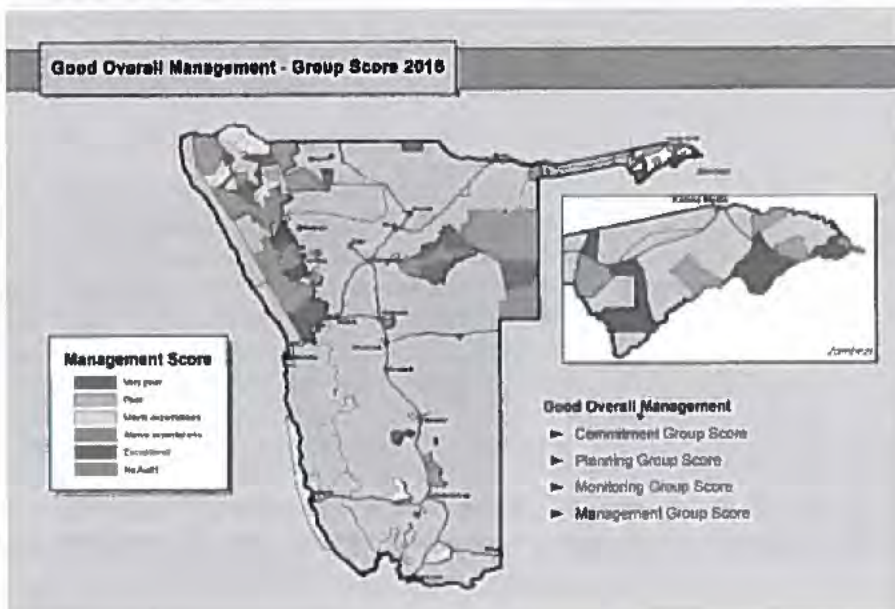
Conservancies, community forests and other legally recognized community

conservation initiatives have created effective formal structures for democratically managing communal resources.

CBNRM, Community Based Natural Resource Management, is the basis of democratic control by local communities over natural resources and the distribution of benefits from them, usually through communal conservancies.



The Conservancy Chairperson's Forum is a national opportunity for conservancies to learn about issues and to exchange views, as well as to raise issue of concerns with senior officials from the Ministry of Environment and Tourism



Natural resource management performance ratings

Institutional development data is collected annually during integrated audits. Conservancies are rated for their commitment, planning, monitoring and management. Conservancies use the information to evaluate and improve their governance, and support organisations are able to provide targeted assistance.



Institutional development can take place without an office – Lusese is a newer conservancy, gazetted in 2014

Institutional development in conservancies in 2015

Order	Category	Status	Number of conservancies reporting	Percentage of category
1	Registered conservancies (incl. Kyaramacan assoc.)	83	83	100
2	Conservancies generating returns	62	83	75
3	covering operational costs from own income	28	46	61
4	distributing cash or in-kind benefits to members, or investing in community projects	38	46	83
5	Conservancy management committee members	950	78	100
6	female management committee members	370	78	39
7	female chairpersons	11	78	14
8	female treasurers/financial managers	32	78	41
9	Conservancy staff members	853	78	100
10	female staff members	245	78	29
11	Conservancies management plans	52	78	67
12	sustainable business and financial plans	15	78	19
13	Conservancy AGMs held	55	78	71
14	financial reports presented at AGM	52	78	67
15	financial reports approved at AGM	43	78	55
16	budgets approved at AGM	35	78	45

Conservancy management capacities fluctuate, influenced by staff and committee changes, as well as the degree of external support. Many conservancies have strong and growing female participation, and a substantial number of conservancies that used to be dependent on grant aid are now covering operational costs from their own income, with many also distributing benefits to members or investing in community projects.

Governance at a glance

At the end of 2016 there were...

- 52 management plans in place
- 15 sustainable business and financial plans in place
- 52 annual financial reports that had been presented
- 55 annual general meetings that had been held
- 15% female chairpersons
- 41% female treasurers/financial managers
- 39% female management committee members
- 29% female staff members

In communal conservancies in Namibia

What's being achieved?

Community conservation means...

- contributing to improved democracy in rural areas
- empowering individuals, including women, to actively participate in decision-making
- employing staff to manage a broad range of resources
- working according to management and benefit distribution plans
- unlocking human potential by providing access to diverse training and capacity building
- enabling controlled tourism development and conservation hunting activities
- covering an increasing portion of operational costs through conservancy generated income
- developing regional conservation structures

2016 saw:

- continued roll-out of Guidelines for the Management of Conservancies and Standard Operating Procedures by the MET
- continued development of adaptive management in conservancies using data collected by conservancies and collated in poster form

The biggest challenges?

- meeting the governance training needs of the large number of conservancies and community forests
- increasing the distribution of equitable financial benefits to members
- ensuring effective cooperation between conservancy committees and staff
- addressing the loss of institutional capacity and memory during conservancy committee changes
- managing competing expectations from stakeholders seeking access to returns from natural resources and other sources, especially farming

Managing Resources

... means ensuring that they are used wisely so that maximum returns are generated while the natural environment remains productive and healthy ...

Powerful management tools

Traditional knowledge and skills are paired with modern technologies and approaches to enable effective management and innovative resource use.

A wealth of information is gathered through a variety of monitoring mechanisms and processed to provide powerful management. As a result, rural communities are empowered to manage their natural resources to generate significant returns while at the same time ensuring the long-term health of the

resource base – the natural environment. This encourages environmental restoration and biodiversity conservation.

Wildlife populations

Remarkable wildlife recoveries have taken place due to conservancy efforts to minimize poaching and ensure the sustainable use of wildlife. This is most evident in the north-west, where wildlife had been reduced to small numbers through drought and poaching by the early 1980s. It is estimated that there were only 250 elephants

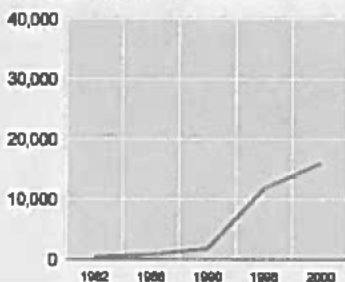
and 65 black rhinos in the north-west at this time, and populations of other large mammals had been reduced by 60 to 90% since the early 1970s. Data from species experts shows that the number of rhinos and elephants has increased substantially since then. Aerial surveys (right) indicate that springbok, gemsbok and mountain zebra populations increased over 10 times between 1982 and the year 2000. Data from the annual North-West Game Count indicates fluctuations in the average number of animals seen. The fluctuation of game numbers in north-west Namibia is

consistent with 'boom-and-bust' dynamics of arid environments. While strengthened community stewardship through communal conservancies has assisted with impressive population recoveries from the early 1980s through 2011, such good management cannot offset the impacts of four years of prolonged drought. However, the estimated numbers of all species remain at or above those recorded through the aerial surveys at the end of the period of the 1990s and far above the populations of the 1980s.



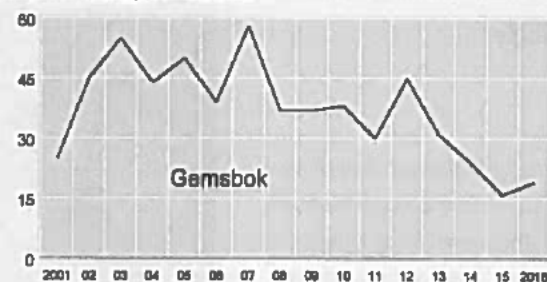
Aerial counts

Total population estimate

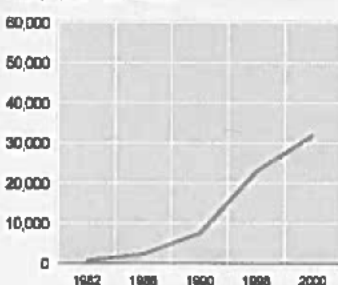


Annual North-West road-based Game Count

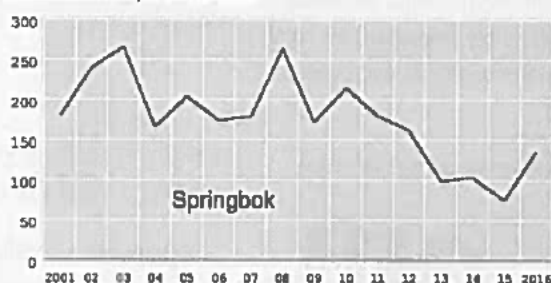
Number of animals per 100km driven



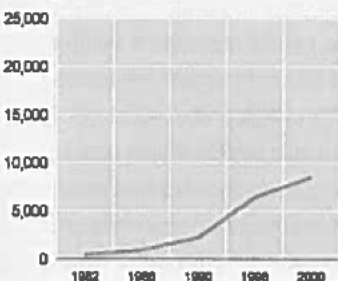
Total population estimate



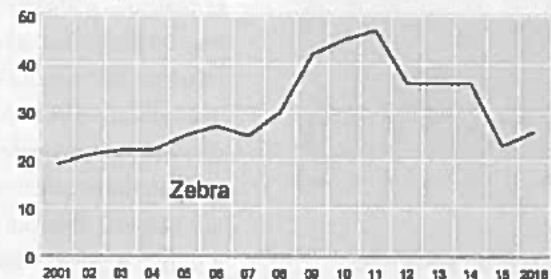
Number of animals per 100km driven



Total population estimate



Number of animals per 100km driven



Natural resource management at a glance

At the end of 2016 there were...

- 83 conservancies using the Event Book monitoring tool (figures include 3 unregistered, emerging conservancies & the Kyaramacan Association)
- 51 conservancies conducting an annual game count
- 5 national parks undertaking collaborative monitoring with conservancies
- 72 conservancies holding quota setting feedback meetings
- 72 conservancies with own-use harvesting quotas
- 55 conservancies with conservation hunting concessions
- 18 conservancies with shoot & sell harvesting contracts
- 52 conservancies with a wildlife management plan
- 38 conservancies with a zonation plan
- 584 game guards and resource monitors working in conservancies

What's being achieved?

Community conservation means...

- combatting poaching, trafficking of wildlife products and other illegal activities
- mitigating human-wildlife conflict by limiting losses to farmers
- zoning areas for different land uses to reduce conflicts
- enabling wildlife recoveries, effective natural resource management and environmental restoration
- working to promote a large landscape approach to natural resource management
- black rhinos roam freely in communal conservancies
- elephants roam freely across 48 conservancies
- lions occur in 24 conservancies
- species that had become locally extinct in the Zambezi Region, such as eland, giraffe and blue wildebeest, are thriving after re-introductions

2016 saw:

- improvement of wildlife harvesting control mechanisms
- adaptive management strengthened with feedback from conservancies
- game guard accreditation scheme rolled out
- induction training for committees continued

The biggest challenges?

- low wildlife harvest quotas because game numbers have not fully recovered
- ensuring that wildlife harvesting is well-controlled and sustainable
- ill-informed criticism of natural resource management
- continued external threats to ban the export of hunting trophies
- building recognition of the vital role of community game guards
- minimizing impacts and optimizing returns from consumptive game use
- promoting incentive-based conservation
- increased commercial poaching and trafficking of wildlife products

Improving Lives

... means empowering people to diversify incomes from farming to include economic opportunities based on tourism and wildlife ...

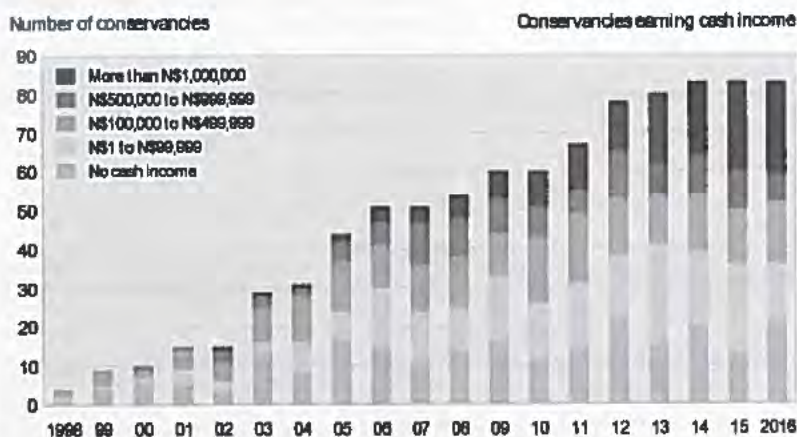
New income sources

Returns from wildlife and other natural resources generated through community conservation have proven to be substantial, including direct income to conservancies from tourism and conservation hunting, jobs created, and benefits including the distribution of game meat. New opportunities for rural job creation have arisen, especially in tourism where people are employed in a range of activities.

Diversification of income is a significant contribution to peoples' livelihoods and contributes to community resilience against episodic events such as drought and floods. The ability to cope with such events is increasingly necessary for rural communities confronted with the harsh reality of a climate changing to even greater levels of aridity.



Anna Maria Kopper, IKhob iNaub Conservancy

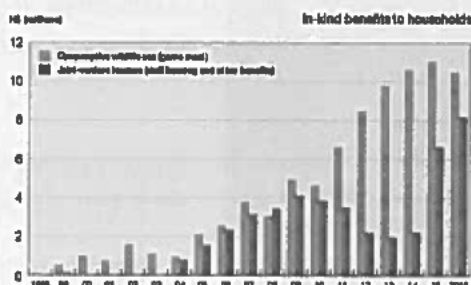
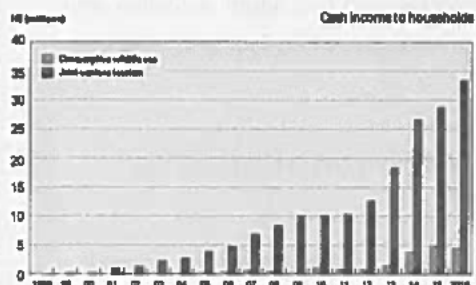
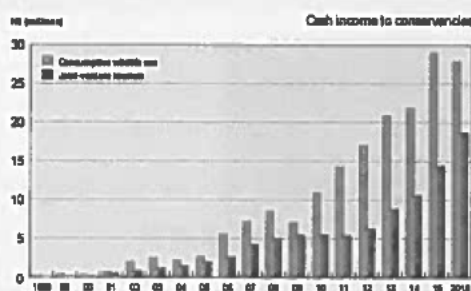
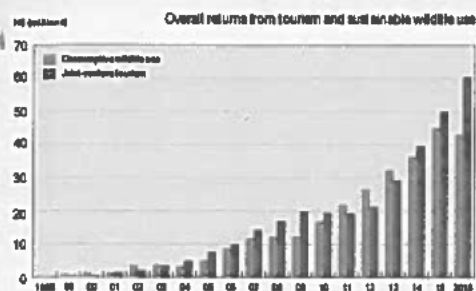


The earning power of conservancies

The graph shows the number of conservancies earning cash, divided into incremental categories (including the Kyaramacan Association). There are great differences in the potential of conservancies to generate cash income. It is noteworthy that the number of conservancies generating a high income, (dark blue, top) is increasing.

The earning power of conservancies

Significant differences exist between conservancies. There are vast differences in size (the biggest conservancies are more than 200 times as large as the smallest), as well as in the number of residents (ranging from several hundred to more than 30,000). Topography, rainfall and natural habitat influence the quantity and quality of natural resources available in a given area. The skills and experience of conservancy management also affect earning power. Joint-venture tourism and conservation hunting make the greatest financial contributions to conservation, e.g. game guard salaries, and to livelihoods. Meat from hunting is an important in-kind benefit to conservancy members.



The complementary roles of sustainable consumptive wildlife use and joint-venture tourism

While overall returns from the two sectors are similar, consumptive wildlife enterprises, specifically conservation hunting, generates much higher fees to conservancies, which can be used to cover operational costs and development projects. In respect to in-kind benefits to households, conservation hunting remains the main contributor in the form of game meat.



Salambala
Conservancy Treasurer
Judy Mwinga

CBNRM returns at a glance

At the end of 2016 there were...

- 53 joint-venture tourism enterprises with 954 full time and 72 part time employees
- 38 conservancies directly involved in tourism activities
- 55 conservation hunting concessions with 136 full time and 179 part time employees
- 28 small/medium enterprises with 122 full time and 27 part time employees
- 853 conservancy employees
- 950 conservancy representatives receiving allowances
- 1,284 indigenous plant product harvesters
- 570 craft producers

In communal conservancies in Namibia

What's being achieved?

by community conservation...

- Conservancies and private sector partners generated N\$ 111,232,053 in returns and benefits during 2016
- of this, tourism generated N\$ 84,835,710; consumptive wildlife use (which includes hunting and live game sales) N\$ 32,522,368; indigenous natural products N\$ 1,620,138; and miscellaneous income (including items such as interest) N\$ 1,984,880
- From consumptive wildlife use, meat to the value of N\$ 10,468,960 was distributed to conservancy residents
- Conservancy residents earned a total cash income of N\$ 52,492,271 from enterprise wages, of which N\$ 32,173,686 was from joint venture tourism, N\$ 14,744,081 from conservancies, N\$ 3,596,891 from conservation hunting and N\$ 1,977,813 from SMEs
- Conservancy residents earned cash income of N\$1,400,638 from indigenous plants and N\$1,465,841 from crafts
- N\$ 11,252,045 was distributed to conservancy residents either in cash or used to support community projects

2016 saw:

- Piloting the Wildlife Credits and Incentives Scheme continued, designed to link the conservation performance of conservancies with investors willing to pay for independently verified conservation performance achievement. Revenue will be reinvested directly into human wildlife mitigation efforts and other conservation activities by conservancies

The biggest challenges?

- Improving the financial management of conservancies
- Increasing the ability of conservancies to manage their contractual responsibilities towards the private sector
- Involving the private sector, which benefits from conservancy conservation, e.g. mobile tourism operators
- removing barriers to private sector investment in communal areas, as there are considerable risk of investing in communal lands
- developing revenue streams in areas with low tourism potential or few natural resources

Working for a common vision...

... means focussing on what can be achieved, rather than yielding to difficulties; looking beyond individual activities and local impacts to regional, national and trans-boundary connections, influences and achievements, while facing challenges, anticipating change and striving for sustainability...

The Namibian conservancy movement has become an internationally acclaimed CBNRM success model. Community conservation is making significant biodiversity contributions and creating synergies with state protected areas. It is strengthening rural economies and contributing to rural development. A large number of conservancies are already fully self-financing. Other community conservation initiatives are well established and operating effectively. A sound foundation is being created, but more needs to be done to consolidate gains and attain sustainability. The CBNRM programme needs to integrate policies and activities fully, ensure adequate technical support and long term maintenance, continue to expand and diversify natural resource potential, and to remove barriers and counter threats that may arise.

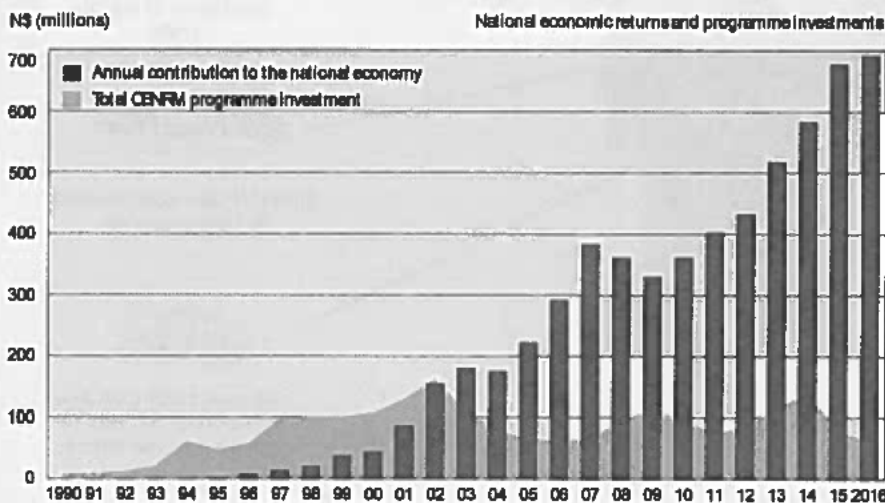
How conservation contributes to the economy

Economic contributions from CBNRM may be termed contributions to net national income (NNI). The NNI contributions can be defined as the value of goods and services that community conservation activities make available each year to the nation.

Further economic values could be counted if adequate measures were available, including the economic value of local management institutions and the increased capacity that results from training provided to people associated with conservancies.

The economic merits of programme spending can be seen by comparing the investment in community conservation against returns in terms of NNI, and increasing annual stock asset values in a cost-benefit analysis (Figure right). This can provide an indication of the degree to which the investment made in the CBNRM programme has contributed overall to the national economy and whether this investment has been economically efficient





Estimates of the national economic returns from CBNRM compared to economic investment costs

In 2016, the net national income (NNI) contribution made by CBNRM was about N\$ 692 million. Between 1990 and 2016, the cumulative value of the NNI contributions amounts to an estimated N\$ 5.98 billion*.

The graph also shows the investment in the CBNRM programme each year, which cumulatively adds up to about N\$ 2.1 billion of investment between 1990 and 2016. Donors supplied most of the funds, while the MET and NGOs also provided inputs, mainly as 'in-kind' contributions such as staff, vehicles and other kinds of support.

The future at a glance

Community conservation may ...

- grow to cover 90-100 conservancies and 40-50 community forests
- cover over 21% of Namibia and well over 50% of all communal land
- encompass up to 15% of all communal area residents and well over 50% of rural communal areas residents in suitable areas

What might be achieved?

Community conservation can...

- facilitate significant further growth of tourism in communal areas and increase local involvement
- enhance the reputation of Namibia as well as communal areas offering some of the country's most attractive destinations
- entrench Namibia's position, as offering some of the best conservation hunting on unfenced land in Africa
- mitigate the effects of climate change by reducing dependence on subsistence agriculture
- maximize the potential of indigenous plants through further strategic international partnerships
- strengthen incentives for people to live with and manage wildlife, and protect its habitat, so that future generations can continue to share in this important African heritage

2016 SAW:

- continued roll out of Game Guard Certification Scheme Wildlife Credits pilot programme expanded
- improved compliance with MET Standard Operating Procedures
- start of Wildlife Incentives and Credits Scheme
- progress towards the establishment of the Community Conservation Fund of Namibia

The biggest challenges?

- enabling optimum conservancy governance capacities, effective decision-making and wise leadership, as well as proactive membership
- countering the pressure to ban the legal consumptive use of wildlife
- optimizing land allocation and administration in communal areas
- ensuring long-term technical support to community conservation structures
- achieving self-sufficiency and programmatic sustainability
- creating country-wide awareness of the growing threat posed by commercial poaching and international wildlife crime



The Ministry of Environment and Tourism facilitates the registration of conservancies and is responsible for compliance monitoring. NACSO supports the MET in conservancy governance and assists in the annual game counts

NACSO MEMBERS



Associate members

Three Regional Conservancy Associations - Kavango, Kunene and Ojozondjupa. These are independent organisations comprised of registered and emerging conservancies in their respective regions acting as representative umbrella bodies

Focus on fishery protection with the Namibia Nature Foundation

Namibia is well-known for its highly productive sea fisheries. But there is much less awareness of the vital role the inland river and floodplain fisheries in the north of Namibia play in food security and livelihoods for much of the country's rural population, including some of the poorest communities in the country.



Two pilot FPAs have been established by Namibian communities, one in Sikunga Conservancy and another in Impalila Conservancy. In a major success last year, at the request of the conservancies and with the Minister of Fisheries and Marine Resources (Hon. Bernard Esau) having taken a direct interest, the FPAs were formally designated as "Fish Reserves" by the Namibia Government. Each of the protected river channels is over 12 km long and together they represent a major commitment to protecting the fish breeding stocks

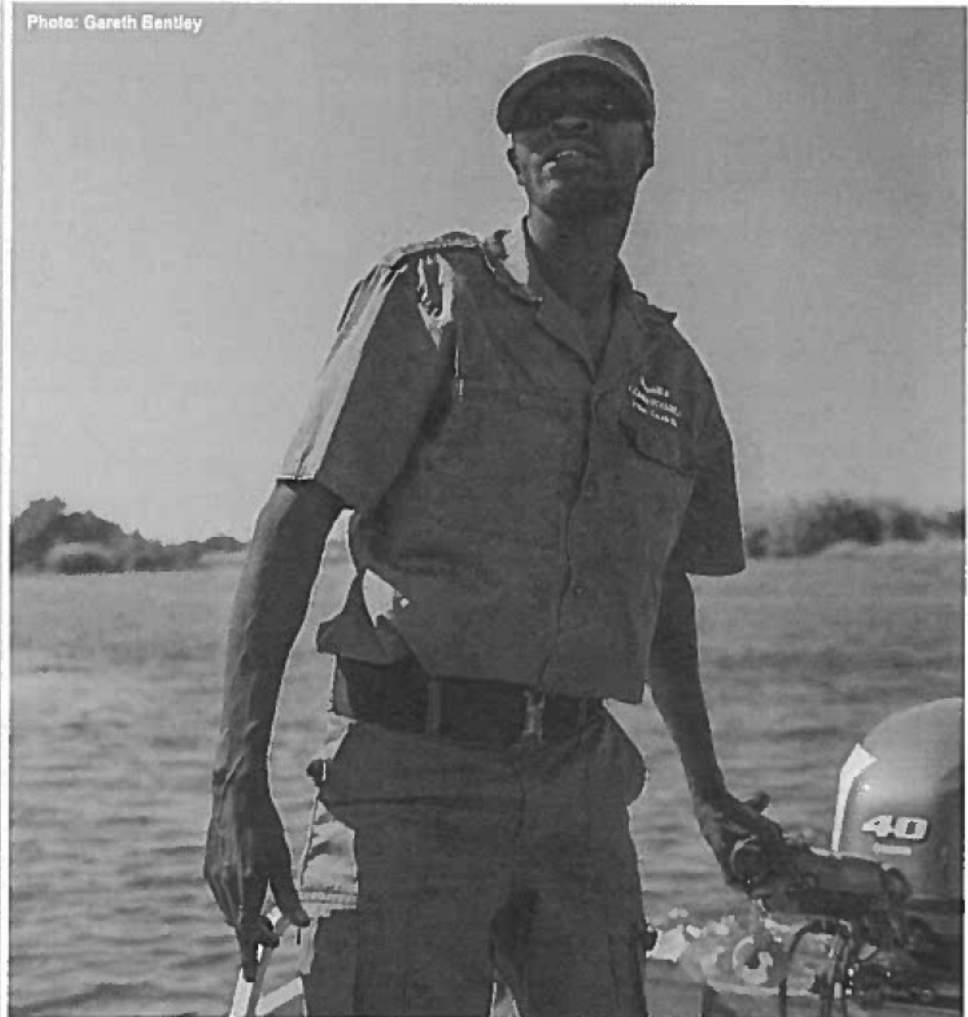
This is an edited extract from an article by Denis Tweddle, Project Coordinator – NNF/EU Community Conservation Fisheries in KAZA Project

Three major perennial rivers in the north east of the country, the Kavango, Kwando and Zambezi, all support significant fisheries, with additional fishing in Oshanas, the shallow depressions that fill in the north central area during the flood season. However, these freshwater fisheries have in recent years suffered serious declines due to increased, uncontrolled exploitation using environmentally destructive fishing gear.

The NNF has a long-term programme, in partnership with ministries and other organizations, to address the situation. The current NNF EU-funded project, Community Conservation Fisheries in KAZA, aims to encourage and empower local communities to take responsibility for managing fishery resources sustainably.

Throughout the world, Marine Protected Areas (MPAs) are increasingly used to protect fish breeding stocks. This approach is increasingly understood by the Zambezi fishing communities, and the concept of Fish Protection Areas (FPAs) is being adopted by communities.

Fish guard on the Zambezi in Sikunga Conservancy



Community conservation

grew out of the recognition that wildlife and other natural resources were of value in communal areas, and that those resources could be unlocked if local communities were empowered to manage and utilize resources themselves.

The Namibian CBNRM programme is based on strong partnerships with the Namibian government, international donor agencies, local and international NGOs, the private sector and community conservation organizations.

www.nacso.org.na



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US Fish & Wildlife Service

\$ 100⁰⁰

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Details on back



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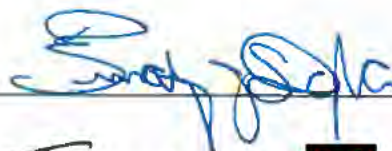
FEB 9 2018


This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: 

Name: Timothy  Dayka

Date: 1/24/18



Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES Threatened-listed
(Appendix I of CITES and/or **ESA**) lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name DAYKA	1.b. First name TIMOTHY	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number (b) (6)	6.b. Alternate telephone number (b) (6)	6.c. Fax number (b) (6)	6.d. E-mail address (b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution N/A		1.b. Doing business as (dba)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information					
1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes) (b) (6)					
1.b. City CLOVIS	1.c. State CA	1.d. Zip code/Postal code (b) (6)	1.e. County/Province	1.f. Country USA	
2.a. Mailing Address (include if different than physical address, include name of contact person if applicable) SAME					
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country	

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue. MA33600C-0 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature (in blue ink) of applicant responsible for permit (No photocopied or stamped signatures) <i>(b) (6)</i> Date of signature (mm/dd/yyyy) 1/26/2018	

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/of ESA)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:

- a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

P. l. melanochaita (African lion)

- b. Sex (if known).

Male

2. IF ANIMAL IS CURRENTLY LIVING IN THE WILD, please enter the following:

- a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

Zimbabwe, Deka Pool Safari Area, Matabeleland North, DD -18,472852, 26,425552 Hwange

- b. Date wildlife is to be hunted:

10 JUNE 2019 TO 01 JULY 2019

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

SKIN, SKULL, TEETH, CLAWS (ALL PARTS FOR LIFE SIZE MOUNT)

3. IF THE ANIMAL IS DEAD, please enter the following:

- a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

- b. Date wildlife was hunted:

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: TROPHY CONSULTANTS INTERNATIONAL
 Business Name: TROPHY CONSULTANTS INTERNATIONAL
 Address: 4 JOSIAH CHINAMANO RD
 Address: BELMONT
 City: BULAWAYO
 State/Province: MATABELELAND
 Country, Postal Code: ZIMBABWE 0000

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information provided by Conservation Force, Buby and Save Valley Conservancies, Zimbabwe authorities, CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below) **safari operators, and others**

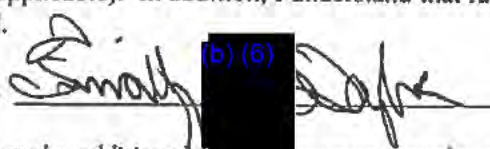
6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

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: 1/24/18

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).
9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):
10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.
- ☒ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.
11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Attorneys at Conservation Force, 504-837-1233, cf@conservationforce.org
12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?
- ☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

(b) (6)

(b) (6)

Date 1/26/18

Pay to the Order of US Fish and Wildlife Service

100.00

One hundred & 00/100

Dollars

BANK OF AMERICA
936 G ST.
REEDLEY, CA 93654

For

Melhan Taylor

(b) (6)

Antique


CheckWorks, Inc. 1 (800) 871-4223



Permit Number: MA33600C-0
Effective: 08/02/2017 Expires: 08/01/2018

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: 1A
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803


SCOTT
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

TIMOTHY (b) (6) DAYKA
(b) (6)
CLOVIS, CA (b) (6)
U.S.A.

Authority: Statutes and Regulations: 16 USC 1533(d); 50 CFR 17.32.

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Conditions and Authorizations:

- A. Authorized to import, for personal non-commercial use, the sport-hunted trophy of one male Marco polo argali (*Ovis ammon polii*) taken during the 2017 / 2018 (September 1, 2017 to March 1, 2018) hunting season from the Murgab region of the Republic of Tajikistan.
- B. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Tajikistan for the 2017 / 2018 season.
- C. Trophy must be accompanied by a valid Convention of International Trade in Endangered Species (CITES) Appendix II export permit issued by the Management Authority of Tajikistan.
- D. If no trophy is imported, this permit should be returned to the Division of Management Authority on or before the expiration date.
- E. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.
- F. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.
- G. Valid for use by permittee named above.
- H. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

BOARD OF DIRECTORS:
JOHN J. JACKSON, III, J.D.
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February 21, 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041

FEB 26 2018

Re: Applications for Import of Sport-Hunted Lion and Leopard Trophies

Dear Chief Van Norman:

Enclosed please find three applications to import sport-hunted lion trophies and one application to import a sport-hunted leopard trophy. These applicants will hunt in the Savé Valley Conservancy in 2018. This conservancy is well known for their excellent wildlife management, including management of lion and leopard. The conservancy maintains increasing carnivore populations subject to a local management plan, and conservative offtake quotas. Regulated hunting revenues are reinvested in wildlife management and protection, including 30-40 highly trained anti-poaching that protect the conservancy's large black rhino population. We respectfully request that you consider the enclosed information and the information submitted by Zimbabwe's Parks and Wildlife Management Authority and Conservation Force, including the lion hunting report dated January 31, 2016, in making a positive enhancement finding for this applicant.

Please do not hesitate to contact us if you have questions.

Sincerely,



Regina Lennox

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III, Regina Lennox, and other attorneys of the non-profit law firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed African lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

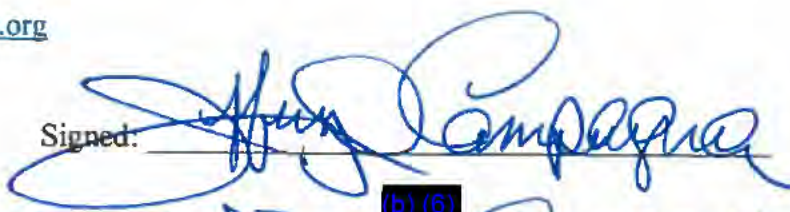
I also request that Conservation Force be copied with all correspondence, acknowledgements, notices, and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
cf@conservationforce.org

Signed: _____

Name: _____

Date: _____


(b) (6)
JEFFREY CAMPAENA
2/15/18



Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

FEB 26 2018

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)


Threatened-listed lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name Campagna	1.b. First name Jeffrey	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number (b) (6)	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address (b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution N/A	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information					
1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)					
1.b. City Moline	1.c. State IL	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province	1.f. Country USA	
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)					
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country	

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)
	2-15-18 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: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
Panthera leo melanochaita/African Lion
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
Zimbabwe/Save Valley Conservancy/20deg,28'40"S - 32deg,14'55"E/Humani Ranch/Chiredzi (nearest town)
 - b. Date wildlife is to be hunted:
June/July of 2018
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
Complete skin (including claws), Skull (including teeth)
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
 - b. Date wildlife was hunted:

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:
Business Name: Trophy Consultants International
Address: 4 Josiah Chinamano Rd
Address: Belmont
City: Bulawayo
State/Province:
Country, Postal Code: Zimbabwe

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information submitted by Conservation Force and range states authorities and operators.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: N/A Date:

7. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  Date: 2/10/18

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).
9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please **DO NOT** include credit card number or other information; you will be contacted for this information.

Fedex account # (b) (6)

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Conservation Force, 504-837-1233, cf@conservationforce.org

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

(b) (6)

(b) (6)

2/15/18

DATE

PAY TO THE
ORDER OF

US Fish and Wildlife Service \$ 100⁰⁰
One hundred and no

DOLLARS



Photo
Safe
Deposit®
Order in back



Wells Fargo Bank, N.A.
Wells Fargo
wellsfargo.com

FOR

(b) (6)

Danise Gougeon

Harvard College

BY THE WLDN



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
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5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

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lion

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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 Cater	1.b. First name Paul	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number (b) (6)	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution N/A		1.b. Doing business as (dba)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information					
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)					
1.b. City Katy	1.c. State Texas	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province	1.f. Country USA	
2.a. Mailing Address (include if different than physical address, include name of contact person if applicable) N/A					
2.b. City N/A	2.c. State N/A	2.d. Zip code/Postal code: N/A	2.e. County/Province N/A	2.f. Country N/A	

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 15US691580/9 No <input type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Paul Cater Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)
	02/06/2018 Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (*Appendix I of CITES and/or ESA*)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

P. l. melanochaita (African lion)

b. Sex (if known).

Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

Zimbabwe Sav's Conservancy

b. Date wildlife is to be hunted: *6/19/2018 - 7/12/2018*

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks). *Skin, Skull, Claws*

3. **IF THE ANIMAL IS DEAD**, please enter the following:

a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

N/A

b. Date wildlife was hunted:

N/A

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

N/A

- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

N/A

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Leon Du Plessis
Business Name: Sav'e Safaris
Address: Box CH 381
Address: Chisipite
City:
State/Province: Harare
Country, Postal Code: Zimbabwe

N/A

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature:

N/A

Date:

N/A

7. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:

PJ ato

Date:

02/04/2018

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).
9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

N/A

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Attorneys at Conservation Force, 504-837-1233, cf@conservationforce.org

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

(b) (6)

(b) (6)

DATE 2/8/18

PAY TO THE ORDER OF US Fish and Wildlife Service

\$ 100⁰⁰/₁₀₀

One Hundred 00

DOLLARS  Security Features

CHASE
JPMORGAN CHASE BANK, N.A.
WWW.CHASE.COM

[Signature]

FOR _____

MP

(b) (6)

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III, Regina Lennox, and other attorneys of the non-profit law firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed African lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that Conservation Force be copied with all correspondence, acknowledgements, notices, and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
cf@conservationforce.org

Signed: Eric [REDACTED] Tahde
Name: Eric [REDACTED] Tahde
Date: 02/15/2018



Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

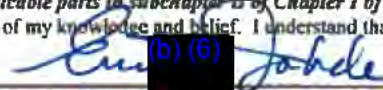
Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES Threatened-listed
(Appendix I of CITES and/or ESA) lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name Jahde	1.b. First name Eric	1.c. Middle name or initial (b) (6)	1.d. Suffix N/A
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. A (Titillation/ Doing business as (see instructions) N/A
6.a. Telephone number (b) (6)	6.b. Alternate telephone number (b) (6)	6.c. Fax number (b) (6)	6.d. E-mail address (b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution N/A		1.b. Doing business as (dba)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information			
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)			
1.b. City Parker	1.c. State CO	1.d. Zip code/Postal code: (b) (6)	1.e. Country USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)			
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. Country

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter D of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink, of applicant/person responsible for permit (No photocopied or stamped signatures)) Date of signature (mm/dd/yyyy) 02/15/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting, please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
P. l. melanochaita (African lion)
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
Mokore Camp, Save Valley Conservancy, Masvingo, Zimbabwe
 - b. Date wildlife is to be hunted:
October 1 - October 21, 2018
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
Skin and claws, skull and teeth, all ^{parts} for a life-sized mount.
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
N/A
 - b. Date wildlife was hunted:
N/A

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
N/A

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:
N/A

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Gary Duckworth
Business Name: Mokore Safaris
Address: 7 Stable Close
Address:
City: Borrowdale, Harare
State/Province:
Country, Postal Code: Zimbabwe

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information provided by Conservation Force, Bulye and Save Valley Conservancies, Zimbabwe authorities, **CERTIFICATION STATEMENT** (original signature must be provided for either 6 or 7 below) **safari operators, and others**

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: 02-15-2018

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Attorneys at Conservation Force, 504-837-1233, cf@conservationforce.org

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe

Dr Byron du Preez^{†1}, Dr Rosemary Groom^{†2}, Olivia Mufute^{§3} and
Roseline Mandisodza-Chikerema^{¶3}

¹Bubye Valley Conservation Research Initiative

²African Wildlife Conservation Fund

³Zimbabwe Parks and Wildlife Management Authority

January 31, 2016



**BUBYE VALLEY CONSERVATION RESEARCH
ZIMBABWE**



**African Wildlife
Conservation Fund**

byron.d.dupreez@gmail.com

rosemary@africanwildlifeconservationfund.org

omufute@zimparks.co.zw

mandisodza@gmail.com

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SUMMARY OF STEPS TAKEN BY ZIMBABWE TO IMPROVE THE MANAGEMENT OF LION SPORT-HUNTING

- i* – Banning of all lioness hunting in Zimbabwe
- ii* – Hunting moratoria around the Gonarezhou and Hwange National Parks
- iii* – Removal of fixed hunting quotas
- iv* – Age restrictions on sport-hunted lions
- v* – Scientifically-based adaptive quota management system

SUMMARY OF LION SPORT-HUNTING'S CONTRIBUTION TO CONSERVATION

- i* – Lion sport-hunting contributes 33.9% to 42.4% of total revenue on private land
- ii* – Lion sport-hunting generates up to US\$ 557 km⁻²
- iii* – Anti-poaching (in particular that of rhinoceroses) costs ~US\$ 216 km⁻²

INTRODUCTION

THE United States Fish and Wildlife Service (USFWS) have recently evaluated the conservation status of the lion *Panthera leo* with particular regard to sport-hunting (<http://www.fws.gov/endangered/what-we-do/lion.html> [accessed 2015-01-19]). The results of this evaluation have led to the formal protection of two subspecies under the Endangered Species Act, classifying *P. l. leo* as endangered and *P. l. melanochaita* as threatened. Together these subspecies apparently represent all of the lions in Africa (Barnett et al. 2014).

Sport-hunting is a legal activity in which the international import/export of trophies is both sanctioned and carefully controlled by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The USFWS found that the sport-hunting of *P. l. melanochaita* “if well managed, may provide a benefit to the subspecies” (<http://www.fws.gov/endangered/what-we-do/lion.html> [accessed 2015-01-19]). Here we explore this statement further, and present data from three long-term *in situ* lion research projects: the Bulya Valley Conservation Research Initiative, Savé Val-

ley Conservancy Research, and the Hwange Lion Research Project.

The data presented in this report clearly illustrates the positive conservation benefit that well-managed trophy hunting of lions can have for the species, as well as the importance of hunting in maintaining the wildlife in an area; addressing Point 5 on page 3 of the Federal Fish and Wildlife Permit Application Form (Form 3-200-20) [i.e. "Please be

aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (c.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application"].



Figure 1: The lions pictured here, known as Winston (*standing*) and Geronimo (*lying*), were both collared in March 2012 when they were the dominant males in the Matombosa area and have been continuously monitored ever since as part of the on-going long-term WildCRU Bulye Valley Conservation Research Initiative. In November 2015 Geronimo, who was approximately 9 years old, died after succumbing to injuries sustained from fighting with another male. Winston, also 9 years old, has since lost his dominant status, lost his territory to two 4.5 year old males, become nomadic and avoids contact with other males. As of this report being written, the recent litter of cubs that both Winston and Geronimo sired are still alive.

Most importantly, since July 2013 there has been a continuous self-imposed internal reform of the lion hunting industry in Zimbabwe that is actively participated in and supported by all of the relevant stakeholders, including; the Zimbabwe Parks and Wildlife Management Authority

(ZPWMA), non-governmental organisations, professional hunters, safari operators, scientists and researchers.

Here we discuss the results of this process in terms of robust evidence regarding the sustainability and self-regulation of lion hunting in Zimbabwe.



Figure 2: Winston and Geronimo's cubs.

LIONS – *Panthera leo*

The IUCN Red List have recently reclassified lions as Vulnerable (remaining as such since 1996; IUCN 2015), estimating that there are between 20,000 and 30,000 free-ranging lions left (Bauer et al. 2015a) in less than 25% of their historic range (IUCN 2006). However, this generalised classification does

not take into account an apparent conservation dichotomy: sample subpopulations of lions in Botswana, Namibia, South Africa and Zimbabwe have in fact increased overall (Bauer et al. 2015a). Lions were historically present throughout Africa, some of Europe, the Middle East and Asia (Bauer and Van Der Merwe 2004), but current conservation strongholds remain only in parts of eastern

and southern Africa (Brassine and Parker 2012; Nowell and Jackson 1996). The current lion population estimate for Zimbabwe's major lion areas is approximately 2,600 individuals [Hwange-Matetsi Complex: 750, South Eastern Lowveld: 350, Gonarezhou National Park: 60, Malilangwe: 37, Savé Valley Conservancy: 284, Bulyebe Valley Conservancy: 500, Mid-Zambezi Valley Complex: 600], though the actual number would be larger if there were data available for the countries minor lion areas that are yet to be surveyed] (ZPWMA 2015).

The lion is a uniquely social felid, forming coalitions of up to nine males associated with one or more female prides that may consist of more than 20 individuals (Macdonald et al. 2010; Schaller 1972). Lions are infamously infanticidal (Schaller 1972), where males will kill unrelated cubs so as to bring the female into oestrus and present an opportunity to sire their own litter, which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2010), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, does not result from sport-hunting when age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004). Moreover, the fission-fusion nature of lion society (Mosser and Packer 2009; Pusey and Packer 1987) means that infanticide may still occur when the dominant males are simply not present there and then to defend their cubs (B. du Preez, pers. obs.).

In the 1990's, lions were successfully reintroduced into private areas in parts of their

former range, where they achieved high reproductive and survival rates (Miller and Funston 2014). However, the resultant population growth inevitably led to the potential problem of overabundance (Funston 2008) and low genetic diversity (Trinkel et al. 2010), with both of these issues requiring active and intensive management (Hunter et al. 2007) and ultimately reducing the conservation value of these lion populations (Miller and Funston 2014). The ability to translocate lions originally facilitated the relief of overpopulation, but as the available areas for relocations were used up, sport-hunting and euthanasia have subsequently become the main methods of lion population control (Miller and Funston 2014).

The lion is the apex predator wherever it occurs (Macdonald et al. 2010), and is an ideal conservation umbrella; being large, charismatic and easily observable (e.g. Williams et al. 2000). Lions are important to commercial wildlife ventures, which risk losing significant market share where they cannot offer them to clients (Lindsey et al. 2007), and are thus prioritised in conservation; exploiting their charisma to attract tourists and raise the funds required in ensuring that wildlife areas remain viable. The lion is also a particularly valuable species in the sport-hunting industry, rivalled only in demand by buffalo *Syncerus caffer* and leopard *Panthera pardus* (Creel and Creel 1997), and are therefore prevalent in private wildlife areas (Packer et al. 2013) where their populations can achieve exponential growth rates given the protection and resources afforded by well-managed operations (Smuts et al. 1978; Loveridge et al. 2007b; Kettles and Slotow 2009; Miller and Funston 2014).

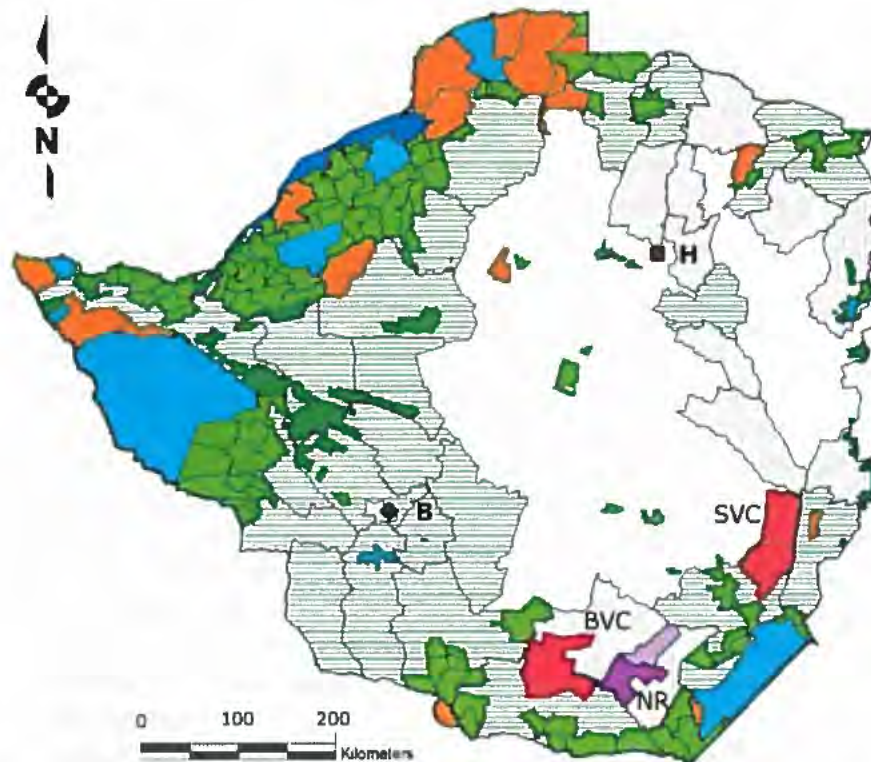


Figure 3: Map of Zimbabwe's main wildlife areas: [i] National Parks are represented in light blue; [ii] Safari areas are represented in orange; [iii] Forestry areas are represented in dark green; [iv] Community and Private wildlife areas are represented in light green; [v] Communal Land (CAMPFIRE Areas) in which sport-hunting may occur is represented by light green horizontal stripes; [vi] Communal Land in which sport-hunting does not occur is represented by grey vertical stripes. [vii] The Bubiye Valley [BVC] and Save Valley [SVC] Conservancies are represented in red. [viii] The Nuanetsi Ranch [NR] on which sport-hunting takes place is represented in dark purple (light purple represents the Nuanetsi Ranch cattle area); [ix] Lake Kariba is represented in dark blue. Harare (the capital city) is represented by a black square and letter 'H'. Bulawayo is represented by a black diamond and letter 'B'. Sport-hunting may occur in areas: ii, iii, iv, v, vii & viii

The ability of lions to rapidly increase in abundance is an aspect of their ecology that is often overlooked. Lion populations can achieve exponential growth rates (Miller and Funston 2015; Groom and Watermeyer 2015; du Preez et al. in prep.), and the problems associated with high lion densities fast present themselves and require significant

investment in their solution (Hunter et al. 2007; Kettles and Slotow 2009; Loveridge et al. 2007; Packer et al. 2013; Smuts 1978). Whilst unregulated sport-hunting of lions (in particular that of dominant males and pride females) may result in population declines (e.g. Packer et al. 2010; Packer et al. 2009), restricting offtake to only males over

a certain age (i.e. have already bred and/or are no longer dominant) has no impact on lion population persistence, irrespective of quota size (Whitman et al. 2004). Such is the situation currently facing both the Bulye Valley and Save Valley Conservancies, where the lion populations continue to grow despite sport-hunting and increasing quotas. Whilst sport-hunting may not alleviate over-population in these areas, it does somewhat offset the cost of keeping lions. Culling of lions may be the only realistic option for controlling numbers in larger areas, as the use of contraceptives is likely to be inefficient and expensive. Because of fears about public sentiment associated with sport-hunting, it has now become common practice for managers to cull excess lions in more than 45 wildlife areas in South Africa to which lions have been introduced, and which resulted in the wasteful destruction of about 200 lions in 2012 (Miller and Funston 2014).

CONSERVATION AND SPORT-HUNTING

There is more land area in Africa conserved for hunting than there is in all of Africa's formally protected areas combined: approximately 1.4 million km², which exceeds the total area covered by national parks by 22% (Lindsey et al. 2007). For wildlife conservation to be successful outside of national parks, these areas must be self-sufficient and able to generate sufficient revenue to cover the considerable costs of protecting the habitat and wildlife therein (Lindsey et al. 2006). Indeed, conservation would benefit from an incentive to utilise land for wildlife rather than the alternatives of livestock grazing, agriculture, and deforestation.

The international trade of lions, including trophies, is controlled by a strict CITES licensing system on the basis that this trade does not endanger the ultimate survival of the population (<https://www.cites.org/eng/disc/how.php> [accessed 2015-01-19]). The positive aspects of sport-hunting as a conservation tool include a focus on males and a low percentage off-take; neither of which generally jeopardise populations, and also suggest that hunting could play a role in population recovery (Leader-Williams et al. 2005).

The recommendation of setting uniform harvest limits, e.g. 1 lion 2,000 km⁻² (Lindsey et al. 2012; Packer et al. 2010), may be overly simplistic, affect the economics of wildlife based landscape use, and disincentivise investment in conservation (Lindsey et al. 2007). A more practical approach to sustainably setting realistic lion sport-hunting quotas could involve using a positive/negative feedback method that calculates a fluid quota per area based on the previous season's performance. Such an adaptive quota management system has already been implemented in Zimbabwe.

ZIMBABWE'S ADAPTIVE LION QUOTA MANAGEMENT SYSTEM

An adaptive quota management system for lion hunting based on the ages of lions hunted was agreed on in July 2013 in Harare, Zimbabwe, during a meeting hosted by the Zimbabwe Parks and Wildlife Management Authority (ZPWMA) and an independent non-governmental conservation organisation. The points system is summarised in Table 1.

Table 1: *Points allocated to hunting blocks arising from the harvest of lions of different ages*

	≥ 6 years	No trophy	5 years old	4 years old	< 4 years	Failure to submit return, or incomplete return
For quotas of ≥3	4	3	3	2	-3	0
For quotas of 2	4	3	3	2	0	0
For quotas of 1	6	3	3	2	0	0
Resultant quota	<i>These points are added up and divided by 3 to yield the quota for next year</i>					

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the system up and running. In 2014 operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015. The 2015 lion hunt results would thus also determine the 2016 quota.

Results of the Adaptive Lion Quota Management System

In 2015 there was a marked increase in the age of lions hunted in Zimbabwe as a whole. Notably, only one lion of <4 years of age was hunted and the large majority of lions were 5 years or older (Figure 4). In 2013, only 28% of the lions hunted were 5 years or older, in 2014 that figure had risen to 49% and in 2015 to 77.3% (Figure 5). The proportion of lions hunted that were less than 5 years of age dropped overall between 2013 and 2015 (Figure 6). For this achievement, credit is due to the hunting community for showing greater selectivity of harvest. A word of caution however, is that the majority of lions hunted were on the cusp of 5 - 6 years of age and were not older than six years. Restricting hunting to individuals that are at least

six (and preferably older) is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

In 2015 the Zimbabwe national lion hunting quota was set at 85 lions. Of this 85, only 39 were hunted in 2015, and based on the resultant score from aging the trophies, and the fact that operators chose not to hunt lions of inadequate age (see Figures 4, 5 & 6), the recommended quota for 2016 was set at 75 [Harare 2015-11-11]. (The Rural District Council areas in which lions occur are currently exempted from the age restrictions, as was agreed upon at the 2013 lion management meeting in Harare, as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognising the potential negative impacts the species has on the livelihoods of livestock farmers).

Using these figures and estimating the average value of a lion safari at approximately US\$ 80,000 then a 50% offtake (35 lions) would generate US\$ 2,800,000 annually. If management costs are approximately \$150 km⁻² (V. Booth, pers. comm.), then the lion safaris alone can support 18,600 km⁻² of wildlife habitat in Zimbabwe.

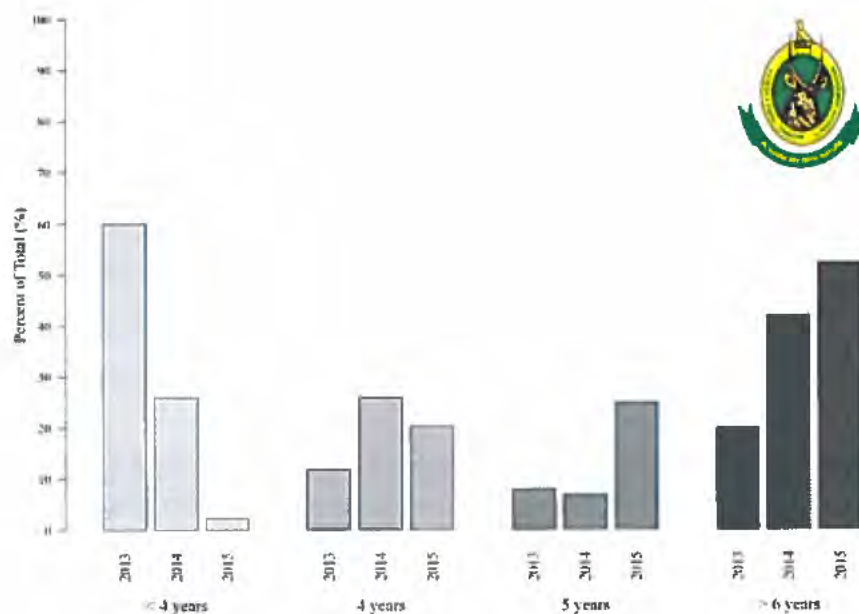


Figure 4: The percentage of lions hunted in each age class in 2013, 2014 and 2015 in Zimbabwe.

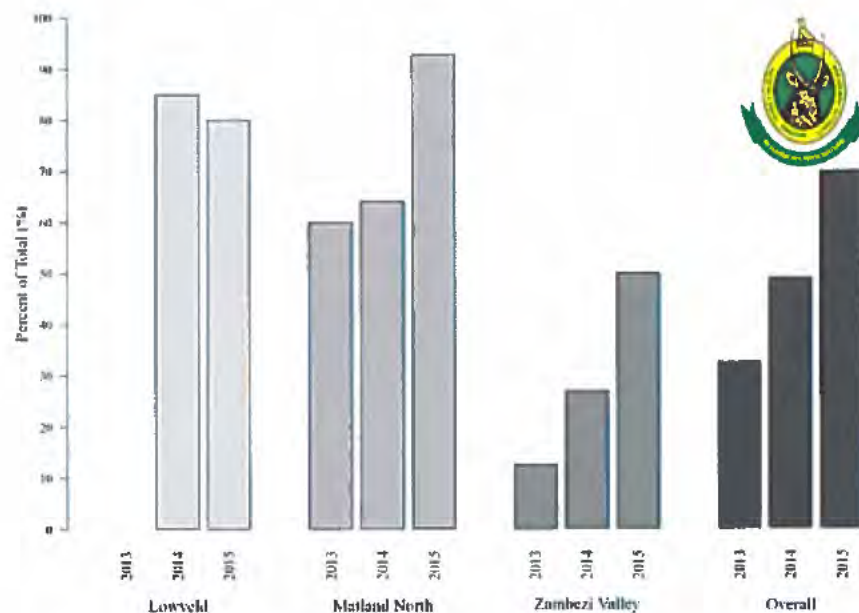


Figure 5: The proportion of lions hunted that were 5 years or older in the three main lion-hunting areas of Zimbabwe.

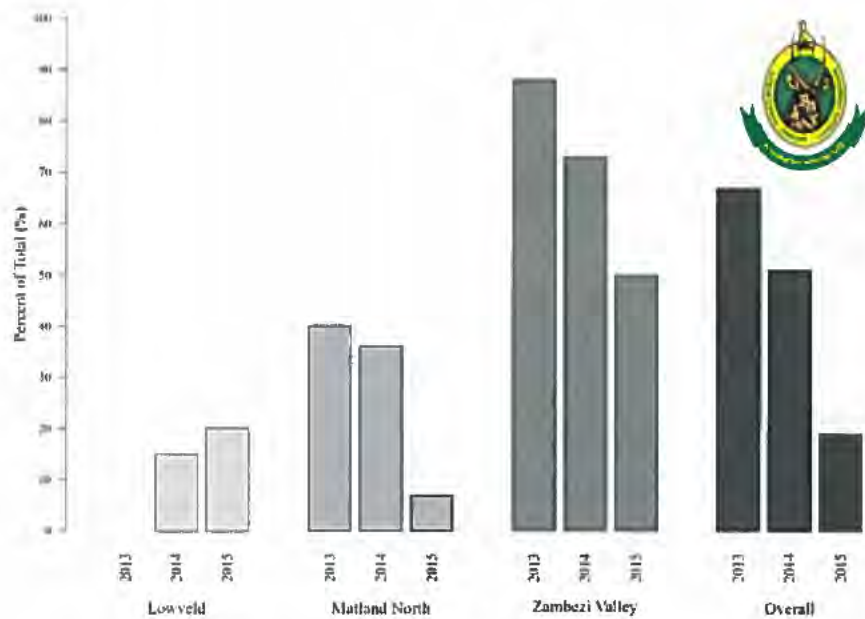


Figure 6: The proportion of lions hunted that were less than 5 years of age in the three main lion-hunting areas of Zimbabwe.

Table 2: *Human and Lion Conflict (2009 - 2011) in Zimbabwe, including human mortality caused by lion (CAMPFIRE Association, 2012)*

District	Total incidents	Livestock killed	People Injured	People Killed
Hurungwe	5	1	2	2
Chiredzi	25	136	0	0
Mbire	5	7	0	5
Binga	9	39	0	0
Total	44	183	2	7

Human-Lion Conflict

The lion is a flagship species and powerful symbol of Africa; yet living with lions poses hardships for many communities (e.g. Table 2). In some areas, the lion is a major predator on domestic livestock, inevitably leading to conflicts with local herders. Both sides suffer in this situation.

Outside of protected areas, the lion's prey base is much reduced, which results in relatively greater chance of encountering live-

stock. Co-existence of lions with people may be enhanced by giving value to lions through tourism and hunting promoted in communal lands under the Communal Area Management Programme for Indigenous Resources (CAMPFIRE). This hunting contributes to the conservation of lions via the financial revenue generated, which is ploughed back into conservation of the resource and empowers local communities to invest in their own rural development programs.

THE BUBYE VALLEY CONSERVANCY

History of the Buby Valley Conservancy

Towards the end of the nineteenth century, the Liebig's Extract of Meat Company (LEMCO) founded an extensive cattle ranch in the Zimbabwean lowveld, to the detriment of the indigenous wildlife that was initially eliminated because of competition for grazing with the livestock, as well as a risk of disease transmission from buffalo and wildebeest *Connochaetes taurinus*. As their natural prey base became depleted, the predators were subsequently persecuted when they began to prey on the livestock. Some wildlife persisted in small pockets of remote habitat, however lion, elephant *Loxodonta africana*, buffalo and rhinoceros *Diceros bicornis* [black] & *Ceruthotrium simum* [white] were all completely eradicated. A monoculture of cattle dominated the landscape and impacted on the environment for the better part of a century.

Then, in 1992, Zimbabwe suffered one of the worst droughts on record, a relatively short time after the devastating one of 1983 that LEMCO was still trying to recover from. The frequency and severity of the droughts effectively reduced confidence in the economic viability of cattle ranching in the area, and the Buby Valley Conservancy was subsequently founded in 1994 with the realisation that endemic wildlife, which are better adapted than livestock to cope with the local climate, could be successfully commercialised (Child 1988; Bond 1993).

The conversion from cattle ranching back to a wildlife area was neither straightfor-

ward nor cheap, requiring a significant initial investment and annual running costs. In just 20 years of operation the Buby Valley Conservancy now protects the world's third largest black rhinoceros population, one of Zimbabwe's largest lion populations, a large and increasing elephant population, and abundant game.

Sport-hunting is an essential step in converting areas that were previously dedicated to livestock farming into non-consumptive tourism areas (Child 1993), and was fundamental to the formation of Buby Valley Conservancy and allowing the wildlife populations to recover. The Samanyanga area of the Buby Valley Conservancy, probably the most scenic section, was originally set aside for non-consumptive photographic tourism, but made an annual loss for several years, before, largely due to Zimbabwe's land reform program and resultant instability in the country, it was reverted back to sport-hunting as the only practical and economically viable option (K. Leathem, pers. comm.). Sustainable sport-hunting provides the sole economic incentive to continue operating the Buby Valley Conservancy as a wildlife conservation area.

Buby Valley Conservancy Community Support

The Buby Valley Conservancy donates over 45 tonnes of meat from sport-hunting to the local communities each year. This meat donation is worth over US\$ 100,000 per year, and the communities are free to decide how they use it. In addition to this, the Conservancy also supports several schools, clinics, and community projects in the three surrounding districts of Mwenzezi, Maranda and Jopembe. The local community thus

sees a direct benefit from the wildlife on the Bulye Valley Conservancy, but is also empowered by job opportunities created both with these special projects, as well as on the Conservancy. A summary of the Bulye Valley Conservancy community support effort between 2011 and 2015 is provided in Table 4.

Bulye Valley Conservancy Lion Monitoring and Management

After originally being eradicated by cattle ranchers in the area, 13 lions were reintroduced to the Bulye Valley Conservancy in 1999, and four young males broke into the Conservancy that same year. From the original 17 animals present in 1999, the Bulye Valley Conservancy lion population was estimated at approximately 280 individuals in 2009 when robust population surveys were initiated by a research team from the University of Oxford Wildlife Conservation Research Unit (WildCRU), and this population has continued to grow. Today it is estimated that there are over 500 lions on the Bulye Valley Conservancy (du Preez et al. 2015). The exponentially increasing Bulye Valley Conservancy lion population currently exists at one of the highest

densities in Africa (~ 0.187 lions km^{-2} ; du Preez et al. 2015; Figure 7), greater than that of the Serengeti, Tanzania (0.100 lions km^{-2} ; Pusey and Packer 1987; Spong 2002), Selous, Tanzania (0.080 - 0.130 lions km^{-2} ; Creel and Creel 1996, 1997), Kruger National Park, South Africa (0.096 - 0.112 lions km^{-2} ; Mills 1995), and Hwange National Park, Zimbabwe (0.027 lions km^{-2} ; Loveridge et al. 2007). This equates to one of the largest contiguous lion populations in Zimbabwe.

Bulye Valley Conservancy Lion Hunting

The Bulye Valley Conservancy offsets the cost of lion predation on its wildlife via sport-hunting of the species, and which began in 2002. In 2014, the lion hunting quota allocated to the Bulye Valley Conservancy by ZPWMA was 10 individuals. Based on the fact that the entire quota was harvested and that maximum points were scored for each individual trophy (more than six years in age), the allocated quota was raised to 13 lions for 2015. Only 12 out of 13 lions were hunted in 2015 due to a late cancellation; nevertheless eight lions over six years old and four lions of five years old were harvested and the resultant points justifying a quota of 15 lions for 2016.

Table 3: *The Bulye Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	1	2	3	2	2	2	3	3	5	8	12	10	10	13
Quota taken	1	2	3	2	2	2	2	3	5	8	12	10	10	12
Percentage success	100	100	100	100	100	100	67	100	100	100	100	100	100	92

Note that while the lion hunting quota for Zimbabwe has been voluntarily reduced by the national steering committee, the Bulye Valley Conservancy lion hunting quota has been successively raised twice

based on both hunt success and age of lions hunted and the resultant points scored under the national adaptive quota management system (Table 3).

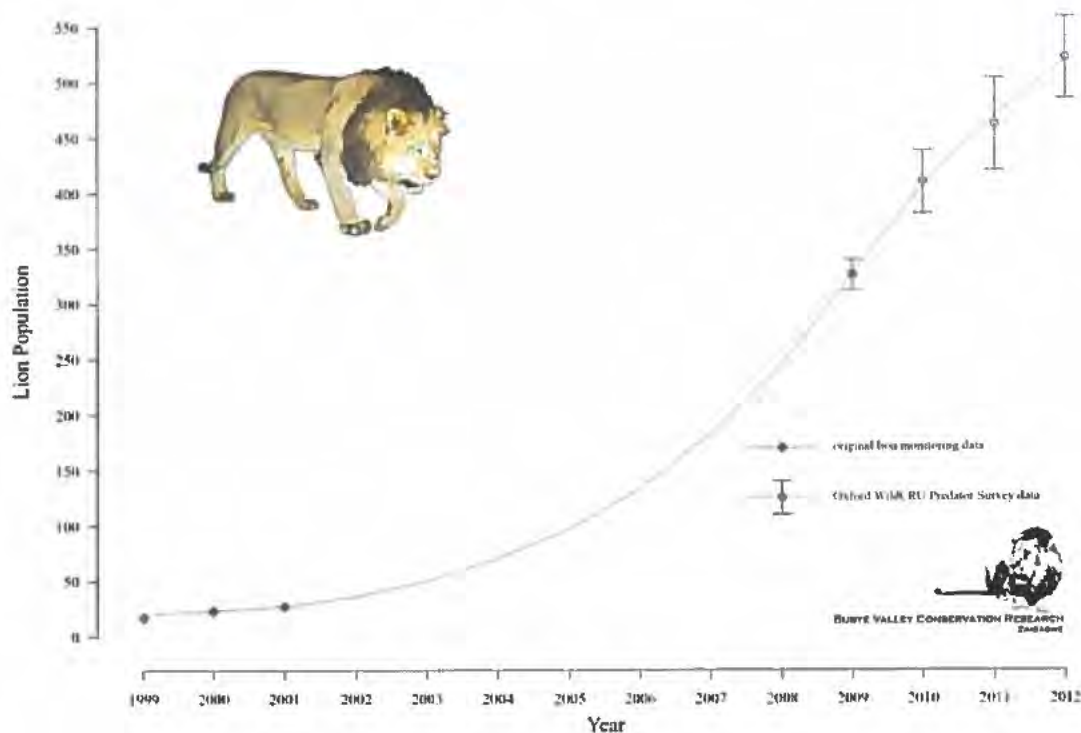


Figure 7: The Bulye Valley Conservancy lion population has grown exponentially since the reintroduction of lions in 1999. Diamonds represent the known lion abundance from monitoring of the original individuals introduced; Points indicate lion abundance calculated from spoor transect analyses; error bars represent the standard error of the mean.

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Table 4: Summary of the Bvye Valley Conservancy support to the surrounding local communities (2011 - 2015)

Boreholes:	<ul style="list-style-type: none"> - 1 x Jompembi Village 2 - 1 x Penemene - 1 x Jompembi Village 4 - 1 x Nyimani village (Mwenezi) - 1 x Driehoek School - 1 x Mgaladivha School - 2 x Mtelengwe to supply water to the clinic site - 2 new bush pumps (complete) purchased and installed at Village 2 & Village 3 and troughs built at both sites <i>Drinking trough for cattle built at Village 2 borehole</i> <i>All boreholes equipped with new bushpumps, piping and cylinders</i> <i>Boreholes at Village 3, Mtelengwe, Mdzwili, Vumani and Penemene and Makado Police post repaired and maintained</i> <i>All new piping and pumps etc. are supplied by BVC</i>
Buildings:	<ul style="list-style-type: none"> - Mtelengwe Clinic's main building built - 3 x F13 staff houses built <i>Clinic and House fenced - everything funded and built by BVC</i> <i>The clinic is a standard large Government clinic - male & female wards + maternity ward and outpatients</i> <i>Storerooms, offices etc. also built</i> <i>All houses and buildings are electrified, painted and supplied with running water</i> - Mtelengwe School school office block and staff room built and painted <i>All classroom windows repaired and the school's second borehole repaired.</i> - Secure engine house was built at the second borehole site - Borehole equipped with BH15S mono pump unit driven by a rebuilt Lister LT 1 engine - 5000 litre header tank and stand erected - new 5000 litre header tank purchased and fitted - pipeline laid to connect the borehole to the clinic - another pipeline connected to the same borehole to supply the Mtelengwe school with fresh water - New coldroom and refrigeration unit purchased and fitted at the Lutumba butchery <i>Part of aid program to get the Beit Bridge RDC self funding projects up and running</i> - New coldroom and refrigeration unit was purchased and fitted at the Rulenga butchery <i>Part of aid program to get the Mwenezi RDC self funding projects up and running</i>
Meat Donations:	<ul style="list-style-type: none"> - BVC donates meat on a regularly basis to the Mwenezi Orphanage - Numerous donations of meat were made to support school sports days & speech nights/prize giving events <i>Both Beit Bridge & Mwenezi districts</i> - 1500 kgs of meat has been donated each month since July 2011 to a Maranda trust <i>Administered by Chiefs and local headmen</i> <i>Excess meat sold and funds used for community projects</i> <i>Classroom roof replaced at Vhongwe school</i> <i>4 new classroom blocks constructed at other schools using funds from these monthly allocations</i> - 1000 kgs of meat per month is been donated to Beit Bridge communities since April 2014 - 1000 kgs of meat per month is been donated to Mwenezi communities since August 2013
Miscellaneous:	<ul style="list-style-type: none"> - Sports uniforms for the Penemene school team purchased (\$2600) <i>Sports uniforms required for inter-schools sports</i> - Transport the soccer teams representing Mgaladivha, Jompembi and Tongwa <i>To Lutumba for the inter-school competitions</i> - 2 sets of soccer goal posts & 2 sets of Netball poles were made for Mgaladivha School <i>New soccer field graded by BVC</i> - 2m security fencing supplied to Penemene School - Second hand door and window frames donated to Mapiri school (ex Mazunga School) - 1 new 3 1/2 " rod pump cylinder was purchased and fitted to the Vumhani borehole <i>All repairs to boreholes in the Vumhani area are done by BVC</i> - 26 bags of cement were donated to Mgaladivha School - Fencing donated to the Mgaladivha School - Supplied 10 x 5/8" mono shafts for the Botalele Clinic (Maranda) borehole - Water supply to Mlelezi Clinic - 400 m pipeline laid to supply the Nyimani Village's cattle with water <i>3.5 m drinking trough build for this same project</i> - 60 bags cement donated to the Welkom for repairs to a dam wall - 6 loads of riversand and 20 cement donated to Vumani Preschool - Various school renovations in both the Beit Bridge and Maranda areas
Current Projects:	<ul style="list-style-type: none"> - Construction of a School admin block at Mgaladivha School - Supply of 24 loads of riversand to Mdzwili School (value \$1200) - All roofing materials supplied to Mdzwili School - Supply roofing materials, cement, all window and door frames for Vumani Preschool

THE SAVÉ VALLEY CONSERVANCY

History of the Savé Valley Conservancy

The Savé Valley was a wildlife-rich wilderness until the early 1900's, when the first cattle ranching initiatives started in the area. The establishment of Devuli Ranch and Angus Ranch in 1920 paved the way for seven decades of commercial cattle ranching in the area we know today as the Savé Valley Conservancy. Roads were cut, fences erected and an everlasting 'battle' ensued against the wildlife, especially against all predators.

The large predators, especially lions, were virtually eradicated (Pole 1999). However, by the late 1980's, declining range productivity, depressions and droughts forced the landowners to consider alternative options. Around that time, empirical evidence of the competitive advantage of wildlife over livestock began to emerge (Child 1988; Bond 1993), especially in arid areas (Jansen et al 1992; Cumming 1993), and wildlife was finally given serious consideration as a viable land use option.

In 1989, a proposal was drawn up (du Toit 1989) to turn what was then the Sabi Valley Intensive Conservation Area into a wildlife conservancy. The plan was to create a single large wildlife area, especially for the re-establishment of endangered species and overexploited species, with cattle remaining the primary income generator. The Savé Valley Conservancy was constitutionally inaugurated in June 1991, and following the severe 1991/1992 drought, wildlife ranching became the primary land-use. At the time this was the largest private wildlife conser-

vancy in the world (3,410 km²).

The conservancy members then restocked the wildlife, removed all internal fencing, erected a common perimeter fence and developed effective security systems. A double, electrified, veterinary-approved fence was completed in 1995, and the following decade saw a massive investment in wildlife re-stocking and security systems.

Sport-hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, re-stock game, and improve security, especially because of the significant numbers of black rhinoceros now found there. Gradually, some of the ranchers shifted more into ecotourism. One property, Senuko Ranch, completed a 16 bed up-market lodge with a view of marketing non-consumptive safaris, offering game drives and bush walks and specializing in rhino walks and African wild dog *Lycan pictus* den visits. Lodge occupancy rose from 0% in 1996 to 62% by the end of 1999.

However, the Zimbabwean land reform program, which was initiated in February 2000, soon made a strong negative impression in the international community, and resulted in travel bans and warning from most of Zimbabwe's source markets. This, together with the political instability meant that the wildlife industry and ecotourism industry collapsed over-night: sport-hunting became the only economically viable land use option, and has remained the only tangible source of income to the landowners of the Savé Valley Conservancy. In the case of the Senuko Lodge, for example, the land reform program resulted in a 98% cancellation of

the confirmed bookings. After four years of seeking alternative markets, the lodge could achieve no higher than 17% occupancy, and in 2005 moved back into a hunting-based operation.

A more direct impact of the land reform program for the Savé Valley Conservancy was the loss of 33% of the area of the conservancy to invading subsistence farmers (Lindsey et al 2008). The loss of land was catastrophic and the related pressure from wire snare poaching was extreme. In the following eight years (2001 to 2009), 10,520 illegal hunting incidences were recorded, 84,396 wire snares were removed and at least 6,454 wild animals killed (Lindsey et al. 2011).

Savé Valley Conservancy Community Support and Anti-Poaching

In 2012, conservancy members provided over US\$ 100,000 worth of support to adjacent villages or farmers in the resettled areas. Assistance included drilling boreholes, maintaining boreholes, dredging of dams, assisting with building projects in clinics and schools, assisting with repairs, maintenance and materials at schools, education initiatives, school field trips, provision of computer equipment in schools, craft programs and regular donations of meat.

Moreover, the conservancy recently entered into a mutually dependent agreement with the Chiefs representing the communities surrounding the Savé Valley Conservancy. The agreement links the communities to the Natural Resource Utilisation that occurs through the business operation of the conservancy and opens up opportunities for the local indigenous populations to share in any wealth creation. This agree-

ment strengthens relations between the conservancy and the surrounding local communities and creates an environment that helps to protect, conserve and sustain the natural assets of the area. The hunting tourism of the conservancy is currently the only form of income by which the surrounding communities can benefit. Revenues from trophy lion hunting constitute a significant portion of inflow and thus an important part of the community benefits. Any reduction would seriously jeopardise the growth of this infant positive relationship and community empowerment initiative.

The Savé Valley Conservancy is thus pioneering private-community partnerships in Zimbabwe, and trade restrictions on lion trophies will indirectly adversely affect these already seriously impoverished communities through a reduction in available income to share with communities. This is very likely to have a knock on impact on the lions themselves with a significantly reduced tolerance and an increase in retaliatory poisoning of lions for livestock predation. Without a demonstration of income from lions, the political pressure from the surrounding communities to remove them from the conservancy altogether will be a challenge to resist.

Savé Valley Conservancy Lion Monitoring and Management

After the Conservancy was formed, and persecution stopped, lions, mainly males, recolonized the area and their numbers started to increase in the late 1990's / early 2000's. Few lionesses were observed until 2003, when small family groups and male-female pairs were seen, and by 2004 - 2005 there were some reports of cubs. During this period 13

lions were also reintroduced into the Savé Valley Conservancy. After an initial lag phase the lion population on the Savé Valley Conservancy has increased dramatically and at present is growing exponentially (Figure 8; Groom and Watermeyer 2015).

Monitoring of the lion population began in 1999 (Pole 1999) with track index or call-up surveys being conducted sporadically until 2006. From 2007 to present, annual conservancy-wide track index surveys have been conducted using a standardized methodology (Groom and Watermeyer 2015). The resulting population estimates were verified in 2011 by a baited lion call-up survey and a collation of managers' estimates, all of which provided similar results.

Prey availability models (Hayward et al. 2007) suggest that the carrying capacity for the lion population in the Savé Valley Conservancy is approximately 271 lions. The population estimate for 2015 was 284 lions, suggesting lions have reached their ecological carrying capacity, even whilst being responsibly hunted.

A professional lion management plan was commissioned by the conservancy in 2011 (Funston 2011), to provide the Savé Valley Conservancy members with a science-based

plan to help them ethically and sustainably manage their lion population. This plan specifically advocates the use of hunting as a conservation management tool. It also demonstrates willingness by the conservancy to guide their lion management based on science and advice from professionals.

Savé Valley Conservancy Lion Hunting

Lions have been hunted in the Savé Valley Conservancy since 2002, although that was largely for removal of problem animals. Hunting began properly in 2005 with quotas increasing annually to a maximum of seven per year from 2009 onwards (Table 5), with the quota being raised to ten for 2016 based on trophy ages.

Despite offtakes of lions through sport-hunting, the lion population has continued to increase in the Conservancy. The revenue generated from hunting lions has enabled landowners to invest in proper land management, anti-poaching, water provision and fence maintenance, all of which benefit the lion population (especially as lions seem to be vulnerable to being caught in wire snares; Becker et al 2013; R. Groom, pers. obs.).

Table 5: *The Savé Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	5	5	1	3	3	4	6	7	7	7	4	2	3	5
Quota taken	1	0	1	3	3	3	3	6	5	3	4	1	3	5
Percentage success	20	0	100	100	100	75	50	86	71	43	100	50	100	100

Sport-hunting of lions brings considerable revenue to the Conservancy, revenue that is vital for the continued functioning of the area for wildlife conservation. Without the costs of lions being offset by the income

from sport-hunting, landowners cannot reasonably be expected to tolerate such high lion densities, and their numbers would have to be reduced significantly.

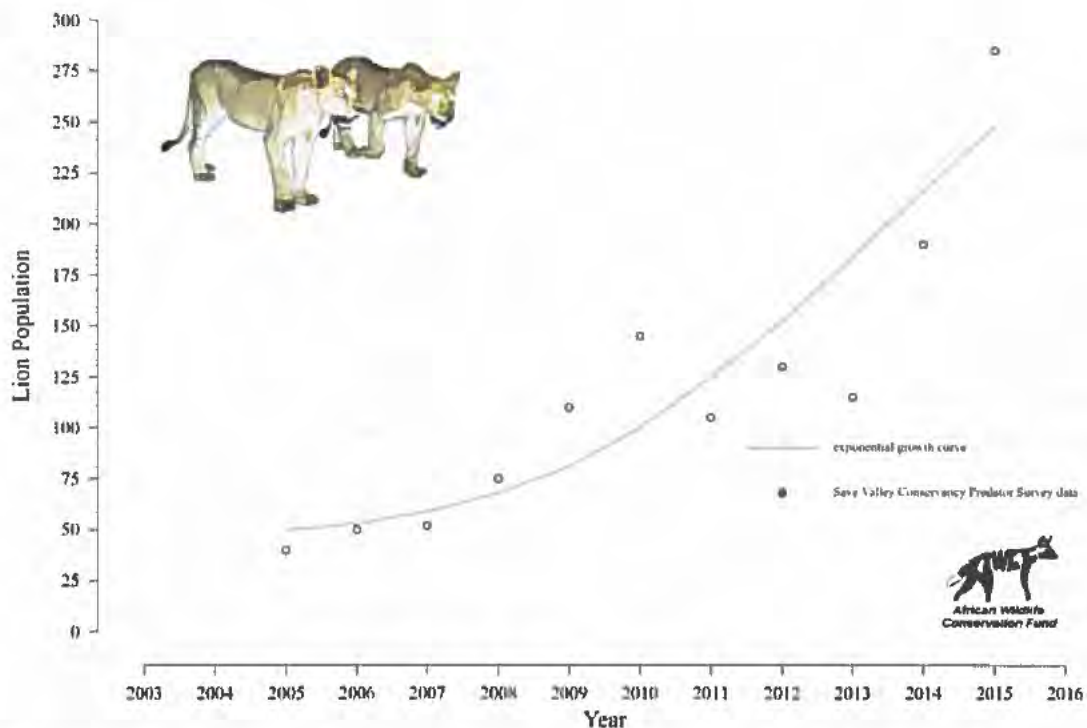


Figure 8: The Savé Valley Conservancy lion population, like that of the Bulye Valley Conservancy, has grown exponentially. Points indicate estimated lion abundance calculated from field surveys; the line represents the exponential growth curve.

THE PROS AND CONS OF CONSERVING LIONS

The saturation of lions in wildlife areas on both state and private land is positive for their future conservation security; but it is also critical to that of incidentally conserved endangered species, such as both species of rhinoceros on private wildlife conservancies in Zimbabwe (Lindsey et al. 2009; Suzuki 2001), which benefit from the same resources and protection that are incentivised and provided by the revenue generated from sport-hunting. The Bulye Valley Conservancy now boasts the world's third largest black rhinoceros population (N. Anderson [Lowveld Rhino Trust], pers. comm.), which is classified as Key 1 by the African Rhino Specialist Group and means that this population is considered key to the overall survival of the species. The Savé Valley Conservancy has the second largest black rhinoceros population in Zimbabwe after Bulye. These are not coincidences. These rhinoceros (and other endangered species, such as wild dog) strongholds are the result of the incidental conservation benefits derived entirely from sport-hunting activities - there are no photographic tourists visiting either the Bulye Valley or Savé Valley Conservancies, and the rhinoceros are not hunted. Having rhinoceros on the land therefore generates no revenue - and in fact there is a significant cost associated with protecting these animals; US\$ 590,000 (not including incentive and reward bonuses donated for these purposes) was spent on anti-poaching by the Bulye Valley Conservancy during 2015 (K. Leathem, pers. comm.), and US\$ 546,000 is spent annually on anti-poaching by the Savé Valley Conservancy (Lindsey et al. 2012). This expense is covered mainly

by the revenue generated by sport-hunting with additional donations from the clients; and most importantly, the habitat for the rhinoceros is preserved by maintaining the land as a conservation area, as opposed to converting it into agricultural or grazing land for example.

However, the high densities of lion populations achieved within commercial wildlife areas have the potential for intense intraguild persecution. Lions are aggressively competitive, and research on the relationship between lions and leopards has shown that high densities of lions can negatively affect leopard population density, demographic structure, cub survival, and spatial ecology down to even the step-wise decisions that leopards make regarding habitat use and behaviour based on both the actual and potential risk of encountering lions (du Preez 2014; du Preez 2015). Leopards are a generalist species that are able to cope with persecution by adapting their behaviour and ecological niche, and even they suffer under a burgeoning lion population; ecological specialists and endangered species, such as cheetah *Acinonyx jubatus* and wild dog, do not fare nearly as well under such intense competitive pressure. In fact, competition with lions has been directly linked to reductions in cheetah (e.g. Durant 1998, 2000; Laurenson 1995) and wild dog (e.g. Creel 2001; Creel and Creel 1996; Vucetich and Creel 1999) densities, both of which face local extinction where lion abundance, and the respective level of persecution, is high. Excessive lion densities may also result in population declines of ungulate prey (e.g. Wegge et al. 2009). It is vital to holistic conservation that wildlife managers can understand and deal with the level of impact that lions exert on other species; particularly those that

are elusive difficult to observe, and which face decline if not carefully monitored. To this end, a conservation research initiative in partnership with WildCRU was established on the Bulye Valley Conservancy in 2009, and research conducted on the Savé Valley Conservancy since 2007.

Based on the number of kills made (du Preez et al. in prep.) and the current value of the meat (K. Lenthem, pers. comm.),

the Bulye Valley Conservancy lion population consumes hundreds of thousands of dollars worth of prey each year. These lions are mainly tolerated because of their ability to generate the revenue that helps to offset this expense - although it is estimated that economically it is still not worth keeping the lions whose cost outweighs their value (Funston et al. 2013).

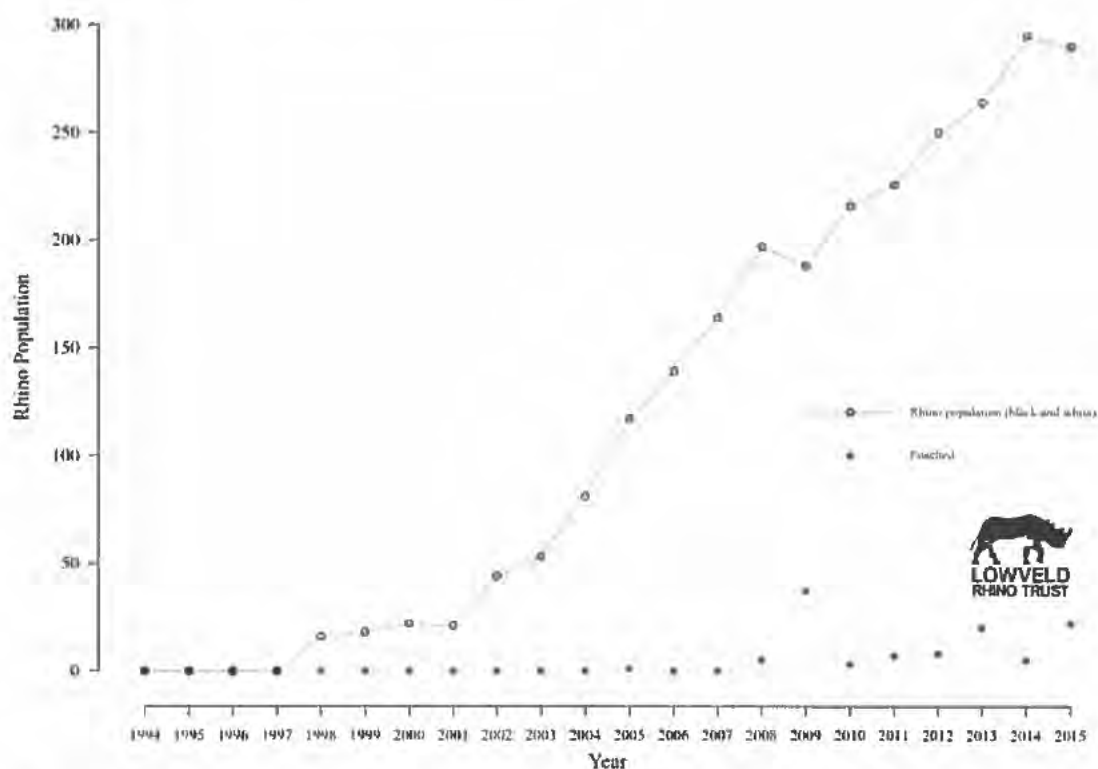


Figure 9: The Bulye Valley Conservancy black rhino population is rated as Key 1 by the African Rhino Specialist Group which means that the population is considered key to the overall survival of the species.

WHERE THE MONEY GOES: THE FINANCES OF LION SPORT-HUNTING AND REINVESTMENT IN THEIR CONSERVATION

Break-down of the finances involved in a typical lion hunt on the Bulye Valley Conservancy:

Lion Trophy fee: US\$ 42,000

Lion Hunt Daily rate: US\$ 2,950 day⁻¹

(Minimum lion hunt duration: 18 days |total daily rate of US\$ 53,100 lion hunt⁻¹|)

Additional costs include:

ZPWMA scout

Observers

Bait used

Other trophy species taken during the lion hunt, etc.

[These additional costs average approximately US\$ 6,500 lion hunt⁻¹]

BULYE VALLEY CONSERVANCY - LION SPORT-HUNTING REVENUE GENERATED (2015):

$$((18 \text{ days} \times 2,950 \text{ day}^{-1}) + 42,000 \text{ trophy fee} + 6,500 \text{ additional costs}) \times 12 \text{ lions} \\ = \text{US\$ } 1,219,200$$

Lion sport-hunting therefore represents approximately 33.9% of the Bulye Valley Conservancy's total annual revenue generation (which includes post-hunt meat and hide sales).

All of the revenue generated from lion sport-hunting on the Bulye Valley Conservancy has gone back into the running costs of the Conservancy, which is all part of conservation, and which includes: anti-poaching and fence monitoring and maintenance (approximately US\$ 506,000 year⁻¹), research (approximately US\$ 34,700 year⁻¹ not including client and sponsor donations), and community support assistance (approximately US\$ 210,000 year⁻¹).

[No profit after costs has been declared, nor dividends taken by shareholders, since the Bulye Valley Conservancy was formed in 1994. All revenue generated to date has been spent on running costs, improvements and restocking.]

DISCUSSION

Here we have shown that since their reintroduction after historical eradication, both the Bulye Valley and Save Valley Conservancies' lion populations have increased exponentially - not despite sport-hunting, but because of sport-hunting and the incentive it provides for protection.

The success of the Bulye Valley and Save Valley Conservancies, in terms of both of their hunted lion and non-hunted rhinoceros populations, may also provide the motivation for other areas in the country to sustainably manage their wildlife resource. A case in point is the Nuanetsi Ranch, a wildlife area that is also a legacy of failed cattle ranching, located almost directly between the Bulye Valley and Save Valley Conservancies in Zimbabwe (Figure 3). At present there is a single lion on the Nuanetsi Ranch but management is not able to justify introducing more due to the current uncertainty over the future of lion hunting (B. Lees-May [Nuanetsi Ranch Conservator], pers. comm.). The Nuanetsi Ranch is a wildlife area of 1,489 km², and could conceivably sustainably hold between 201 and 278 lions (based on the most recently estimated lion densities of the Save Valley [0.135 lions km⁻²; Groom and Watermeyer 2015]; and Bulye Valley [0.187 lions km⁻²; du Preez et al. 2015] Conservancies respectively). However, the Nuanetsi Ranch has invested in building up an abundant wildlife population, which is sport-hunted, and the management will not risk losing a significant amount of valuable game, that could otherwise be sold as trophies or meat, to a species from which it can not recuperate lost revenue, and instead that requires further investment in control measures (B. Lees-May [Nuanetsi

Ranch Conservator], pers. comm.).

Between 2005 and 2015 the United States market has represented 70.4% of the total Zimbabwean lion sport-hunting industry (http://trade.cites.org/en/cites_trade/ [accessed 2015-01-19]), though in reality it constituted over 90% for both the Bulye Valley and Save Valley Conservancies. If this market was effectively lost due an inability of prospective clients to import their trophies, based on the economics involved it would become unviable to continue managing the Bulye Valley Conservancy as a wildlife area in its current form, and lions would either have to be re-exterminated, or at least severely reduced via culling; or else what is the largest privately owned wildlife area in the world would be converted back into a cattle ranching area (K. Leathem, pers. comm.). This is the reality of any business, in that it needs to cover costs and pay staff and cannot run at a loss for luxury of conservation. Child (1993) states *"A refusal to treat wildlife in the same way as other resources and maintenance of centralised protectionist management prejudices its survival. Only by raising its commercial value will wildlife be able to compete for space on the scarce African landscape. Trade bans which detract from wildlife's commercial value prejudice its chances of survival in the long term"*.

Although the USFWS understandably categorises lion conservation by country for simplicity, rather than individual properties, the Bulye Valley and Save Valley Conservancies currently and deservedly hunt more than a third of the total Zimbabwean lion quota between them. Here we have shown that this sport-hunting does not negatively affect the lion population, which remains in positive growth despite off-take. In addition

to this, other areas, such as the Nuanetsi Ranch, could be incentivised to invest in lion conservation if the ability to sustainably utilise the lions as a resource was guaranteed.

The USFWS identified five primary factors that threaten lion survival in the wild, namely: habitat loss; loss of prey; retaliatory killing due to increased human-lion conflicts; inadequate regulatory mechanisms; and weak management of protected areas (<http://www.fws.gov/endangered/what-we-do/lion.html> [accessed 2015-01-19]). Each and every point on this list, which notably does not include sport-hunting, supports the fact that incentivising tolerance for lions through sustainable use would enhance the species' overall survival.

As responsible conservationists, we are not arguing against tight regulation of sport-hunting, especially with regard to sensitive species such as lions, and we support the need for transparency and accountability within the industry. However, this reform is a process being driven from within, as any indiscretion is an affront on all stakeholders. For example, long-term lion monitoring by WildCRU in Hwange National Park (HNP), Matabeleland North, Zimbabwe, documented a 'vacuum effect' and reduction in male lion density in the Park as a result of sport-hunting in the surrounding areas (Loveridge et al. 2007). A result of this research was the recommendation that ZPWMA implement a hunting moratorium in western Zimbabwe, which was accepted and enforced from 2005 to 2008 (Davidson 2009). Subsequent monitoring of the HNP lion population showed that the perturbation effects caused by sport-hunting were

reversed during the moratorium, and sport-hunting was reinstated at a reduced, more sustainable quota (Davidson 2009). This example demonstrates both the relationship between independent researchers and ZPWMA, and that the research assists ZPWMA in robust decision making. This study has also shown that the lion population was able to recover quickly, and that a blanket-ban would have been as unnecessary as it would have been detrimental to overall lion conservation in the country.

In addition to the self-imposed hunting moratorium in the Matabeleland North district, Zimbabwe has voluntarily stopped sport-hunting of any lioness. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season even began, and which was resultant attributed to poor quality trophies and young animals being hunted, has also been abandoned. The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have minimal ecological impact, being old individuals that are no longer contributing to the gene pool nor protecting cubs.

The IUCN Red List lion conservation status has remained unchanged for 20 years even in the face of Africa's ever-changing landscape. Despite fears that lion abundance is decreasing overall, in southern Africa it is in fact increasing (Bauer et al. 2015b).

CONCLUSION

Given the evidence presented, the arguments against sport-hunting would appear to be based more in emotion than logic and reality (e.g. Lindsey et al. 2015). Conservation, however, is not about individuals within populations, but the overall populations themselves. Sustainable sport-hunting of lions is just that: *sustainable* - and ironically, without it, the lions themselves become unsustainable. Conservation objectives need to be balanced with both social and economic factors if they are to be achieved.

The USFWS states "Well-managed conservation programs use trophy hunting revenues to sustain lion conservation, research and anti-poaching activities" (<http://www.fws.gov/endangered/what-we-do/lion.html> [accessed 2015-01-19]). The Bulye Valley and Savé Valley Conservan-

cies both fully meet each one of these conditions: clearly contributing to lion conservation in Zimbabwe; having long-term conservation research programs; and self-funded anti-poaching units.

The histories regarding the formation of both the Bulye Valley and Savé Valley Conservancies were both presented in this report, despite being remarkably similar; the point being that lion conservation in both areas, and many others, has the same fate either way. The Bulye Valley and Savé Valley Conservancies are both excellent examples of focussed and determined efforts to make wildlife based land use viable in an otherwise cattle dominated landscape. However, the fact remains that the cost of having lions, both ecologically and financially, is high. Simply increasing the abundance of one species at the expense of another cannot be considered a conservation success.

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Lion Hunting in Zimbabwe's Savé Valley Conservancy

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27th January 2013

1 Background

This document is a case study of the Savé Valley Conservancy in south-east Zimbabwe, where the African lion (*Panthera leo*) population is increasing exponentially, and where lions have been hunted since 2002. This case study clearly illustrates the positive conservation benefit that trophy hunting of lions can have for the species, and briefly describes the importance of hunting to maintaining wildlife in the area.

2 History of the Savé Valley Conservancy

The Savé Valley was a wildlife-rich wilderness until the early 1900s, when the first cattle ranching initiatives started in the area. The establishment of Devuli Ranch and Angus Ranch in 1920 paved the way for seven decades of commercial cattle ranching in the area we know today as the Savé Valley Conservancy. Roads were cut, fences erected and an everlasting "battle" ensued against the wildlife, especially against all predators.

After the Second World War, cattle prices soared to new heights, and the 1950s were years of development and expansion for the cattle industry. The large predators, especially lions, were virtually eradicated (Pole 1999). However, by the late 1980s, declining range productivity, depressions and droughts forced the landowners to consider alternative options. Around that time, empirical evidence of the competitive advantage of wildlife over livestock began to emerge (Child 1988; Bond 1993), especially in arid areas (Jansen et al 1992; Cumming 1993), and wildlife was finally given serious consideration as a viable land use option.

In 1989, a proposal was drawn up (du Toit 1989) to turn what was then the Sabi Valley Intensive Conservation Area into a wildlife conservancy. The plan was to create a single large wildlife area, especially for the re-establishment of endangered species and overexploited species, with cattle remaining the primary income generator. The Savé Valley Conservancy was constitutionally inaugurated in June 1991, and following the severe 1991/1992 drought, wildlife ranching became the primary land-use. At the time this was the largest private wildlife conservancy in the world (3,410 km²).



Figure 1 The Savé Valley Conservancy (taken from Lindsey et al 2008)

The conservancy members then restocked the wildlife population (4410 animals; Table 1), removed all internal fencing, erected a common perimeter fence and developed effective security systems. A double, electrified, veterinary-approved fence was completed in 1995, and the following decade saw a massive investment in wildlife re-stocking and security systems.

Table 1: Species and the number of animals per species re-introduced into the Savé Valley Conservancy, Zimbabwe

Animal Species	Number Of Animals Re-introduced				Total
	Prior to October 1993	November 1993 to December 1999	January 2000 to December 2002	January 2003 to present	
African buffalo (<i>Syncerus caffer</i>)	91	88	253	40	472
African elephant (<i>Loxodonta africana</i>)	685	-	-	-	685
Black rhinoceros (<i>Diceros bicornis</i>)	-	31	-	-	31
Blue wildebeest (<i>Connochaetes taurinus</i>)	223	525	49	-	797
Burchell's zebra (<i>Equus burchellii</i>)	17	309	66	-	392
Giraffe (<i>Giraffa camelopardalis</i>)	36	101	44	-	181
Lichtenstein's hartebeest (<i>Alcelaphus lichtensteinii</i>)	-	-	-	28	28
Livingston's eland (<i>Tragelaphus oryx</i>)	215	263	102	-	580
Nyala (<i>Tragelaphus angasi</i>)	22	43	11	26	102
Lion (<i>Panthera leo</i>)	-	3	-	10	13
Spotted hyena (<i>Crocuta crocuta</i>)	-	-	-	3	3
Ostrich (<i>Struthio camelis</i>)	-	-	71	-	71
Sable antelope (<i>Hippotragus niger</i>)	49	203	122	-	374
Tsessebe (<i>Damaliscus lunatus</i>)	-	97	-	-	97
Warthog (<i>Phacochoerus aethiopicus</i>)	-	207	-	-	207
Waterbuck (<i>Kobus ellipsiprymnus</i>)	177	66	82	32	357
White rhinoceros (<i>Cerathotherium simum</i>)	-	-	-	20	20
TOTAL					4410

3 Trophy hunting versus Photo tourism in the Savé Valley Conservancy

Trophy hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, re-stock game, and improve security, especially because of the significant numbers of black rhino now found there. Gradually, some of the ranchers shifted more into ecotourism. One property, Senuko Ranch, completed a 16 bed up-market lodge with a view of marketing non-consumptive safaris, doing game drives and bush walks and specializing in rhino walks and African wild dog den visits. Lodge occupancy rose from 0% in 1996 to 62% by the end of 1999.

However, the Zimbabwean land reform program, which was initiated in February 2000, soon made a strong negative impression in the international community, and resulted in travel bans and warning from most of Zimbabwe's source markets. This, together with the political instability meant that the wildlife industry and ecotourism industry collapsed over-night. Sport hunting and trophy hunting became the only economically viable land use options and have remained the only tangible source of income to the landowners of the SVC. In the case of the Senuko Lodge, for example, the land reform program resulted in a 98% cancelation of the confirmed bookings. After four years of

seeking alternative markets, the lodge could achieve no higher than 17% occupancy, and in 2005 moved into a hunting-based operation.

A more direct impact of the land reform program for the Savé Valley Conservancy was the loss of 33% of the area of the conservancy to invading subsistence farmers (Lindsey et al 2008). The loss of land was catastrophic and the related pressure from wire snare poaching was extreme. In the following eight years (2001 to 2009), 10,520 illegal hunting incidences were recorded, 84,396 wire snares were removed and at least 6,454 wild animals killed (Lindsey et al. 2011).

4 Lions in the Savé Valley Conservancy

After the conservancy was formed, and persecution stopped, lions, mainly males, recolonized the area and their numbers started to increase in the late 1990s / early 2000s. Few lionesses were observed until 2003, when small family groups and male-female pairs were seen, and by 2004-5 there were some reports of cubs. During this period 13 lions were also reintroduced into SVC. After an initial lag phase the lion population on SVC has increased dramatically and at present is growing exponentially (Figure 1, Groom 2012).

In 1993, three lions were brought into the conservancy by Human1 Ranch; two adult females and one adult male. One of the females was pregnant and four cubs were reared successfully. A further ten lions (four lionesses and six small cubs) were brought in in 2005 and released on Sango Ranch. A few months later three were killed by wire snares, and the rest of the group split up. Tracks suggest that three adult females and one cub survived.

4.1 Lion monitoring

Monitoring of the lion population began in 1999 (Pole 1999) with track index or call-up surveys being conducted sporadically until 2006. From 2007 to present, annual conservancy-wide track index surveys have been conducted using a standardized methodology (Groom 2012). The resulting population estimates were verified in 2011 by a baited lion call-up survey and a collation of managers' estimates, all of which provided similar results.

Prey availability models (Hayward et al. 2007) suggest that the lion population is currently only at 60% of ecological carrying capacity, and thus we can expect to see the upward trend continue unless population control measures are implemented.

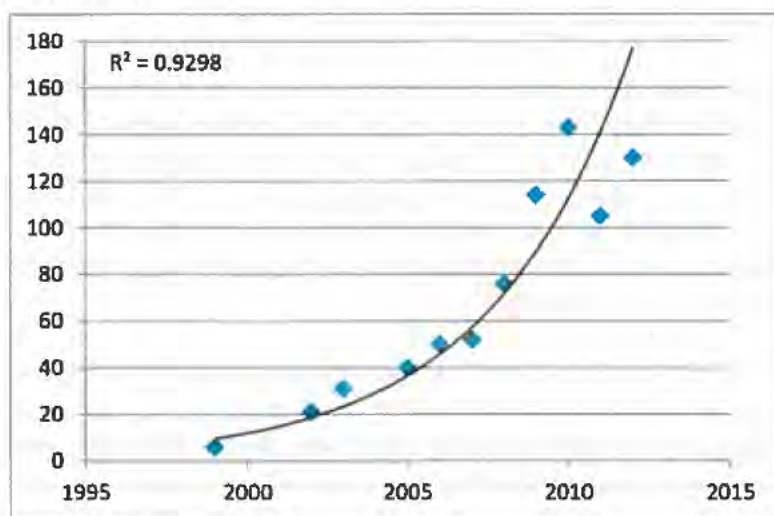


Figure 1 – Lion numbers in Savé Valley Conservancy (1999 – 2012). Trendline is an exponential growth curve. (Adapted from Groom (2012))

4.2 Lion management plan

A professional lion management plan was commissioned by the conservancy in 2011 (Funston 2011), to provide the SVC members with a science-based plan to help them ethically and sustainably manage their lion population. This plan specifically advocates the use of hunting as a conservation management tool. It demonstrates willingness by the conservancy to guide their lion management based on science and advice from professionals.

4.3 Lion hunting in the Savé Valley Conservancy

Lions have been hunted in Savé Valley Conservancy since 2002, although that was largely for removal of problem animals. Hunting began properly in 2005 with quotas increasing annually to a maximum of seven per year from 2009 onwards (Table 2), but with offtake never exceeding six.

Table 2 Lion quotas and offtakes in Savé Valley Conservancy from 2001 to 2011

Approved quota and success (offtake)	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011
Approved quota	4	5	5	1	3	3	4	6	7	7	7
Quota taken (Success)	0	1	0	1	3	3	3	3	6	5	3
Percentage success	0%	20%	0%	100%	100%	100%	75%	50%	86%	71%	43%

Despite offtakes of lions through trophy hunting, the lion population has continued to increase in the conservancy. This is largely because the lion population is still building up after the initial persecution, and trophy hunting of select, older males does not impact this growth. The revenue generated from hunting lions has enabled landowners to invest in proper land management, anti-poaching and fence maintenance, all of which benefit the lion population (especially as lions seem to be vulnerable to being caught in wire snares; Becker et al 2013; pers. obs.).

Trophy hunting of lions brings considerable revenue to the conservancy, revenue that is vital for the continued functioning of the area for wildlife conservation. A 21 day lion hunt is sold for c. \$2,500 per day (prices vary slightly depending on the operator), with an additional trophy fee of \$10,000. Net income from lion hunting from 2005 to 2011 (N = 26 lions) would therefore have amounted to c. US \$1,365,000 in bed nights and \$260,000 in trophy fees.

5 The impact of listing lions as endangered on the US Endangered Species Act

In the current political climate, landowners in the Savé Valley Conservancy have no alternative way to generate sufficient income from wildlife, other than from hunting. Lions are one of the most valuable species to the conservancy. If lions are upgraded to endangered on the Endangered Species Act in the US, the resulting ban on lion trophy imports into the US will effectively result in a collapse of the lion hunting industry in the Savé Valley Conservancy, where on average 90% of hunting clients are American (up to 98% for some properties; SVC members, pers. comm.). The loss of the c. \$375,000 annual revenue will be catastrophic for the conservancy, inevitably resulting in less investment in security and other conservation measures.

It should be noted that lions impose a significant cost on conservancy landowners through predation on valuable prey species that could otherwise be sold as trophies or meat. For the Savé Valley Conservancy, this was calculated as a loss of US\$ 494,776 in 2009, an 8% loss relative to gross income from the species when hunted at current levels (Funston et al, unpublished data). Without these costs being offset by the income from lion hunting, landowners cannot reasonably be expected to tolerate such high lion numbers, and lion numbers would have to be reduced significantly.

In the Savé Valley Conservancy therefore – and it is by no means the only area in this situation – the listing of lions as endangered on the US Endangered Species Act, and the subsequent collapse of the US lion hunting market, would necessitate a culling or contraceptive program for lions, in order to decrease their numbers to economically and ecologically tolerable levels. The upgrade would therefore, instead of protecting lions in these areas, effectively sign their death warrant.

The Savé Valley Conservancy is extremely expensive to run due to pressure from the illegal bushmeat trade and from rhino poaching. In recent years, robust earnings from trophy hunting have allowed annual investments of US\$ 150,000 – 240,000 per year in ranch-based anti-poaching, ensuring that wildlife populations remained stable in all but the areas that were settled (and the heavily impacted immediately adjacent sections). In addition, a central anti-poaching unit operates specifically to provide protection for the conservancy's black rhino, *Diceros bicornis*, population (one of only three remaining populations in Zimbabwe that is defined as having long-term viability in demographic and genetic terms). The operating costs of this unit amount to over \$200,000 per year and are shared between the conservancy members and donors. As rhinos are not trophy hunted in Zimbabwe, members' share of these costs need to be generated some other way – and lion hunting is an important contributor. Thus a removal of lions from the hunting quota due to collapsed demand would reduce the ability of the Savé Valley Conservancy to protect the wildlife resource, including endangered species like its valuable populations of African wild dogs, *Lycaon pictus*, and especially black rhinos.

A knock-on impact of this listing will be felt in the communities which neighbour the Savé Valley Conservancy. In 2012, conservancy members provided over US\$100,000 worth of support to adjacent villages or farmers in the resettled areas. Assistance included drilling boreholes, maintaining boreholes, dredging of dams, assisting with building projects in clinics and schools, assisting with repairs, maintenance and materials at schools, education initiatives, school field trips, provision of computer equipment in schools, craft programs and regular donations of meat.

Moreover, the conservancy recently entered into a mutually dependent agreement with the Chiefs representing the communities surrounding the Savé Valley Conservancy. The agreement links the communities to the Natural Resource Utilisation that occurs through the business operation of the conservancy and opens up opportunities for the local indigenous populations to share in any wealth creation. This agreement strengthens relations between the conservancy and the surrounding local communities and creates an environment that helps to protect, conserve and sustain the natural assets of the area. The hunting tourism of the conservancy is currently the only form of income by which the surrounding communities can benefit. Revenues from trophy lion hunting constitute a significant portion of inflow and thus an important part of the community benefits. Any reduction would seriously jeopardise the growth of this infant positive relationship and community empowerment initiative.

The Savé Valley Conservancy is thus pioneering private-community partnerships in Zimbabwe, and trade restrictions on lion trophies will indirectly adversely affect these already seriously impoverished communities through a reduction in available income to share with communities. This is very likely to have a knock on impact on the lions themselves with a significantly reduced tolerance and an increase in retaliatory poisoning of lions for livestock predation. Without a demonstration of income from lions, the political pressure from the surrounding communities to remove them from the conservancy altogether will be a challenge to resist.

6 Conclusion

The Savé Valley Conservancy is an excellent example of a focussed and determined effort to make a wildlife based land use viable in an otherwise cattle dominated landscape. From inception, conservancy members and international investors have invested huge amounts of finance and effort into re-stocking the area, building up the wildlife to the incredible numbers and diversity found in the conservancy today, and protecting it from poachers.

The revenue to do this has been almost exclusively generated through hunting, due to the collapse of the ecotourism industry after 2000.

In recent years, lion hunts have provided a significant financial contribution to the ever-more-expensive operation of the conservancy, enabling significant investment in security and community support and engagement. Should lions become listed as endangered on the US Endangered Species Act, the resulting collapse of the lion hunting industry will have serious negative implications. The cost of having lions, both ecologically and financially is high, and with no generation of revenue from the species, numbers will inevitably have to be curtailed.

7 References

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WHITETAIL DEER

(b) (6)

(b) (6)

15 Feb. 2018

Date

PAY TO THE
ORDER OF

U.S. Fish and Wildlife Service

\$ 100.00

One hundred and no/100

Dollars



Photo
Safe
Deposit
Details


CITYWIDE BANKS.

For

(b) (6)

[Signature]

Harland Clarke

WILDLIFE PORTAL

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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May 3, 2018

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U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, Virginia 22041

Re: Supporting information for applications PRT 84787C and PRT 78392C

Dear Ms. Barry:

Enclosed please find information to further support the enhancement generated by regulated hunting for two import permit applications that we believe have been assigned to you.

- The first, PRT 84787C, is hunting with Martin Pieters Safaris in Zimbabwe. Mr. Pieters responded to some questions about the anti-poaching and community benefits generated by hunting in the Matetsi Safari Area. Please consider this information in making a positive enhancement finding for this applicant, and please consider the Non-Detriment Finding submitted by the Zimbabwe Parks and Wildlife Management Authority (October 2016), which provides information about the benefits of regulated lion hunting in Zimbabwe's Safari Areas.
- The second, PRT 78392C, is hunting with Gary Duckworth in Save Valley Conservancy in Zimbabwe. We have previously submitted extensive information about SVC, but the operator has provided more. Among other things, this information demonstrates the operator's commitment to habitat conservation and anti-poaching, and the scientific process employed in ensuring healthy wildlife populations and sustainable use. Please note, the operator has also provided more specific information about the location of this hunt (e.g., GPS coordinates and the closest city). He has also provided the PH name. This was not initially provided because this applicant submitted the application prior to release of the new forms. Finally, the operator has corrected the "shipper" for what was question 4 and is now question 8 (the name and address of the person or business shipping the trophy). Would you please substitute this corrected information in place of Mr. Duckworth's name when the final permit is issued. Please let me know if you have questions, and please consider the enclosed information in making a positive enhancement finding for this applicant.

Please do not hesitate to contact us if you have questions about these applicants or need further information.

Sincerely,


Regina Lennox

CC: Acting Chief, Branch of Permits



Regina Lennox <regina.lennox.cf@gmail.com>

enhancement details

Martin Pieters (b) (6)

Wed, Apr 11, 2018 at 9:45 AM

To: regina.lennox@conservationforce.org

Cc: aaron Baker (b) (6)

, Aaron Baker (b) (6)

, "Eubulus Kerr, (b) (6)

(b) (6)

Dear Regina

Sorry for the delay.

I actually have two USA clients hunting lion, Aaron baker (b) (6) actually he has hunt shot his lion with me and will be in touch) and Eubulus Kerr (b) (6)

Both lions will be hunted in the MATETSI region which is a controlled hunting area governed by the Zimbabwe National Parks and Wildlife Authority.

1.

MAP II: MATETSI SAFARI AREA SHOWING THE SIX HUNTING UNITS, KAZUMA, PANDAMASUIE AND ICA.



2. The wildlife authority has all its own reports as they are in contra of the Matetsi safari areas.
3. The ZNPWA have been in control of the Matetsi safari areas for over 40 years and does all its own armed anti poaching as well as community assistance on its boundaries
4. For periodic reports, the ZNPWA would have all those documents.
5. Arial surveys and 48 hour game counts are conducted annually in the Hwange national park which lies

adjacent to Matetsi safari area and forestry hunting blocks.

6. Armed rangers are paid by the department of national parks and they get rewarded for successful apprehension of poachers.

7. It is a safari area hence no villages actually live in the area, the villages surround the hunting area and they benefit from meat and off take from hunting clients which benefits them through the successful CAMPFIRE program.

8. Zimbabwe has a minimum age of 5 years with penalties to safari operators and professional hunters if an underage animal is shot.

9. Hwange National park which adjoins the matetsi block has a dedicated research team and many collared lion for research purposes. The lion population has increased dramatically over the last 5 years due to minimal quotas, successful ageing and community involvement.

10. Matetsi safari area is home to the one of the largest free ranging herds of elephant and buffalo in Zimbabwe. There are no fences and it adjoins hwange national park and Botswana where unrestrained movement of wildlife occurs.

Regards

Martin

Martin Pieters

www.martinpieterssafaris.com

(b) (6)

DISCLAIMER: The information in this message (and any attachments hereto) may be confidential and protected from disclosure. If the reader of this message is neither the intended recipient nor an agent responsible for delivering the message to the intended recipient, you are hereby notified that any unauthorized disclosure of this information is strictly prohibited. Any unauthorized disclosure may cause the breaching party to be liable for damages. If you have received this message in error, please notify the sender by replying to the e-mail message, and delete it from your computer without reading it or saving it in any manner.



Regina Lennox <regina.lennox.cf@gmail.com>

Fwd: Feb 26 2018 1:30:00; Acknowledgement letter for Permit No. "78392C"

3 messages

Eric Jahde (b) (6)
To: "Regina A. Lennox" <regina.lennox@conservationforce.org>

Thu, Mar 22, 2018 at 1:24 PM

Begin forwarded message:

From: SPITS-II Production Email Messenger <permits@fws.gov>
Subject: Feb 26 2018 1:30:00; Acknowledgement letter for Permit No. "78392C"
Date: February 26, 2018 at 11:30:01 AM MST
To: (b) (6)
Cc: <permits@fws.gov>
Reply-To: <permits@fws.gov>

ERIC L. JANDE

(b) (6)

PARKER, CO (b) (6)
U.S.A.

Thank you for submitting an application to the U.S. Fish and Wildlife Service. The application was received by the Division of Management Authority on 02/26/2018; check number 5497 accompanied the application for AFRICAN LION. Your application has been assigned the following PRT identification number: MA78392C-0

While processing time may be less, you should anticipate a minimum of 30 days to process your request, with many requests averaging between 60 to 90 days due to some requests which need to be published in the Federal Register and/or be reviewed by other Service offices.

While we are aware that you may want to inquire about the status of your application, we request that you allow our office at least three weeks after the receipt of this letter to make any inquiries. If you have additional information that needs to be provided, please mail information to DMA, Branch of Permits MS: IA, 5275 Leesburg Pike, Falls Church, VA 22041 by fax 703-358-2281 or call our staff on duty at 800-358-2104.

Regina A. Lennox <regina.lennox.cf@gmail.com>
To: cf@conservationforce.org

Fri, Mar 23, 2018 at 9:51 AM

Could you possibly call and get the legal examiner's name and email for this person? Thank you!

Begin forwarded message:

From: Eric Jahde (b) (6)
Date: March 22, 2018 at 1:24:56 PM CDT

To: "Regina A. Lennox" <regina.lennox@conservationforce.org>

Subject: Fwd: Feb 26 2018 1:30:00; Acknowledgement letter for Permit No. "78392C"

[Quoted text hidden]

John J. Jackson, III <cf@conservationforce.org>
To: "Regina A. Lennox" <regina.lennox.cf@gmail.com>

Mon, Mar 26, 2018 at 11:34 AM

Case manager, biologist

Name: Ann Barry

Email: Anna_barry@fws.gov

Sorry. Called them back this morning. They never returned my call. - AT

[Quoted text hidden]

--

Conservation Force
3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax: (504) 837-1145
jjj@conservationforce.org • www.conservationforce.org



Regina Lennox <regina.lennox.cf@gmail.com>

Fwd: Mokore Safaris Lion Hunt

1 message

Eric Jahde (b) (6)
To: Regina Lennox <regina.lennox@conservationforce.org>

Thu, Mar 22, 2018 at 1:24 PM

Hi Regina,

This is the forward of mailing from Gary Duckworth with proper info as we discussed. I will also forward the PRT mailing from the government.

Thanks very much for your help and please contact me at any time if I can help.

Regards,

Eric M Jahde

(b) (6)

Begin forwarded message:

From: Eric Jahde (b) (6)
Subject: Fwd: Mokore Safaris Lion Hunt
Date: March 21, 2018 at 5:26:00 PM MDT
To: Eric Jahde (b) (6)

Begin forwarded message:

From: "Gary Duckworth" (b) (6)
Subject: RE: Mokore Safaris Lion Hunt
Date: March 8, 2018 at 8:41:56 PM MST
To: (b) (6)
Cc: (b) (6), "Rob Oostindien" (b) (6), "Neil Duckworth" (b) (6)

Good morning Eric,

I hope this finds you well and being successful with your application. I see a recent ruling by USFW is favourable. I thought to send you some information that may help with your application. Sorry I didn't send before but forgot I had these. I have attached some notes that I had written up before. Also attached are our leopard data from Mokore just to show our healthy predator population and also the data we use to try and ensure we judge the lion's age correctly from our trail camera pictures. Also a copy of our PH rules sent to any PHs operating in our areas showing the seriousness we have to ensuring the right animals are harvested. Don, do you have any more recent counts on the SVC lions. I think he last year's count was 225. Still 75 lions above what our ecologists say is

sustainable. I have also copied in a document Neil did on Conservation Through Hunting which shows our companies dedication to these areas even though this is for Mozambique it is our company MO.

Answers that you may need from the permit application if not already done:

1. Page 3, #5 a and c.
2. Page 4, #8.
3. Page 4, #9 a, b, and c.

Page 3 5a) Mokore and Umkondo Ranches, Save Valley Conservancy, Bikita District, Masvingo Province. South Eastern Lowveld. Closest cities Masvingo and Mutare. Mokore Camp – S 20 24' 12.01" E 032 07' 01.88"

5c) Mokore Safaris, Gary or Neil Duckworth as PHs. Gary PH license number 96. Neil PH license number 94.

Page 4 8) Name: Cuan Meredith
Company: Trophy Consultants International
Address: 4 Josiah Chinamano Road, Belmont
City: Bulawayo
Province: Matabeleland
Country: Zimbabwe

- 9a) Please see attachments
- 9b) Please see attachments
- 9c) Please see attachments

I hope this all helps. Good luck.

From: Gary Duckworth (b) (6)
Sent: Thursday, February 15, 2018 4:12 PM
To: (b) (6)
Cc: (b) (6) 'Rob Oostindien'
Subject: RE: Mokore Safaris Lion Hunt

Hi Eric,

Thank you. Lynn will send you a list of things she needs for processing permits, etc. Good luck with the permit.

From: (b) (6)
Sent: Wednesday, February 14, 2018 4:50 PM
To: Gary Duckworth
Subject: Re: Mokore Safaris Lion Hunt

Thank you Gary,
My application is in the works with John Jackson's help. I will wire the deposit to your account here in Mississippi today for the lion hunt in October 2018. Is there any other paper work that I need to start with you?
Eric Jahde

Sent from my iPhone

On Feb 14, 2018, at 7:35 AM, Gary Duckworth (b) (6) wrote:

Good afternoon Eric,

I hope this finds you well. Rob had asked me to assure you that should you not get the import permit for the lion into the USA that we would either return your deposit to you or allow you to roll it over to another year or safari. All deposits are held in an account in Mississippi with our agents at African Horizons. Should your application be turned down for the import of the lion then they (African Horizons) can easily return your deposit should that be your wish. Looking at the fish and game website I am fairly confident that your application should have a positive outcome especially since the Save has not only enough lions, but possibly too many! Please do not hesitate to contact me should you have any further queries.

<image001.jpg>
[<image002.jpg>](#)

10 attachments

Kind regards,

Gary Duckworth

Mokore Safaris
7 Stable Close,
Borrowdale, Harare
Zimbabwe

Phone +263-(0)4-883462
Mobile +263-(0)772 250-178
skype gary.duckworth3
www.mokoresafaris.com
www.mokoreecosafaris.com




Image001.jpg
30K



Image002.jpg
6K

 **Habitat Enhancement Report- Mokore Safaris Zimbabwe.docx**
20K

 **Leopard Data.pdf**
3571K

 **aging_the_african_lion.pdf**
5125K

 **Mokore Safaris PH Rules.pdf**
176K

 **SVC Predators 2015.docx**
26K

 **Zimbabwe Rates 2018.pdf**
508K



AN EXAMPLE OF CONSERVATION THROUGH HUNTING [5741].docx
9659K



USFWS Lion Permit App.pdf
70K

Mokore Safaris (Pvt), Ltd.
7 Stable Close, Borrowdale, Harare, Zimbabwe.
Operator: Duckworth Family.
garyduckworth@mokore.com
Operating in: Save Valley Conservancy and Sengwa Research
Management Area

I. DESCRIPTION OF COMPANY AND CONCESSION

Mokore Safaris has been operating in Save Valley since its conception in late 1992. It also has been operating the Sengwa Research Management Area since January 2013. (This is a 5 year lease with first option to roll over for a further 5 years). The Mokore Safaris section in the Save Valley is 35500 acres and provides habitat for a range of species including black and white rhino, buffalo, lion, leopard, cheetah, crocodile, wild dogs, hippo, kudu, eland, elephant, impala, bushbuck, bushpig, hyena, warthog, zebra, giraffe, waterbuck and sable (lion and leopard prey). It is also home to numerous smaller creatures like grysbok, klipspringer, etc. Sengwa Research is 94000 acres and is home to elephant, buffalo, lion, leopard, crocodile, kudu, eland, impala, bushbuck, bushpig, hyena, warthog, zebra, reedbuck and waterbuck (lion and leopard prey). It is also home to numerous smaller creatures like grysbok, klipspringer, etc.

Our company is family-owned and has been operating in this country since 1979. We employ three full time professional hunters, 3 part time Professional Hunters and also 48 men, 5 ladies and 2 casual labour. Altogether our operations support at least 600 dependents in local villages through our continual work on the schools, roads and dams in the neighbouring village areas. Also supplies of meat and school equipment benefits the surrounding communities.

We have a written concession plan with anti-poaching and community components....

II. ANTI-POACHING COMPONENT

Mokore Safaris maintains a 8 man anti-poaching team at an annual cost of over \$60,000 in the Save Valley Conservancy and supplement Zimbabwe Parks and Wildlife Authority anti-poaching team with a vehicle driver and four rangers in the Sengwa Research Area.... Each team is equipped with a four-by-four vehicle, uniforms and boots, tents, rations, and radios. Our teams closely cooperate with the Wildlife Authority to conduct daily patrols of the concession and the neighboring properties that were taken during the land reform programme. We supply rations once a week to our scouts and assist the government game scouts in acquiring rations to ensure they are sufficiently equipped for the patrols.

We heavily patrol our areas, conducting approximately 3 patrols per day by vehicle and foot in the Save and the same again in Sengwa Research. In the past year, our teams picked up numerous snares and arrested numerous poachers hunting with dogs. Also in the Sengwa Research Area our teams with Zim Parks Rangers have arrested and also killed a number of ivory poachers. Removing snares protects the lion population by reducing incidental snaring.

We also send out road crews annually to redo the roads in the concessions, to ensure we are able to patrol effectively. These are maintained throughout the year.

In 2015, Mokore Safaris (Zimbabwe) spent approximately \$100,000 in our blocks on anti-poaching patrols, equipment, and assistance to the Wildlife Authority and community scouts, including by providing 4000 liters of diesel for patrol vehicles. We also spent \$ 5500 on diesel for pumping water for wildlife in areas where there is not enough natural water for wildlife to survive. This does not include the costs of water pump and engine maintenance. And we made over \$ 4000 in payments of rewards.

COMMUNITY PARTICIPATION

A. Community Assistance Component

Although there are no villages in the concession itself, we share four borders (three in Sengwa and one in Save Valley) with a heavily populated communal district. We make contributions to the two closest villages and the district council. We lease an adjacent area to the concession from the council, and pay a lease fee as well as 85% of trophy fees to the Bikita Rural District Council.

We pledge an annual contribution of at least \$10,000 + in projects to the villages. We ask for a list of preferred projects at each local school and clinic. We also do the main roads annually in the Village 26, Bikita and Muchiringi Districts. We annually dredge the local dams. We supply all meat taken from any elephants harvested on our concessions to the local communities as well as supplying meat for any State Functions.

B. Conflict Control

We also take reports from villagers about problem animals and do our best to keep elephant out of community gardens during harvest. This applies to livestock losses through predation too. We obviously try and use all means to discourage problem animals before having to take more drastic control measures.

IV. HABITAT PROTECTION AND CONSERVATION DEVELOPMENT

We have developed the water infrastructure for the exclusive use of wildlife in our concession including over 30km of piping and 12 waterholes. We drilled, operate, and maintain two boreholes and numerous pans. Pumping costs (diesel usage only) is +-\$ 5500/annum. The increased water supply increases the carrying capacity of the concession and the lion's prey base.

V. OTHER INFORMATION

A. Prey Base

Mokore Safaris along with our other partners in the Save Valley Conservancy's anti-poaching efforts, water provision, and fire management have allowed the lion prey base in our concession to grow over the past twenty five years. Please see attached report on the game numbers increases and lion surveys report. In Sengwa research Area we estimate that our plains game (buffalo, kudu, sable, etc.) have increased by 15-20% in the last 3 years. Also, much of our anti-poaching and community assistance efforts are aimed to reduce livestock encroachment into the concession.

B. Lion Population Tracking

Lion are notoriously difficult to survey or census. To track the lion population trend in our concession, Save Valley Conservancy does an annual spoor survey for predators as well and an aerial survey for other species. Due to the fact that we keep tabs on the lion in our concession, we are

assured that the regulated, limited offtake is sustainable. In Sengwa Research we use trophy and age monitoring of all species hunted and manager estimates to regulate our offtakes.

C. Lion Aging Approach

Mokore Safaris has been following an age-based policy for African lion trophies since 2012, when we adopted a company rule not to harvest lion below five years of age, and to be conservative in estimating age.

As a result, on lion hunts we often pass by a number of potential lion before allowing a client to harvest a specimen. Sometimes we do not shoot a lion at all because we are so selective.

D. Lion Hunting Revenue

Lion are our highest-value species. We require 21-day safaris for lion. Our daily rate is \$2,500 per day, plus a trophy fee of \$15000 (lion). Without this revenue plus the revenue we have already lost due the ivory import bans, our anti-poaching and habitat enhancement efforts will be seriously reduced.

E. U.S. Hunters

Most of our clients (95%) are from the United States. These hunters have a conservation ethic and usually contribute above their fees to anti-poaching or our community compensation fund or community assistance programs.

CONCLUSION

Mokore Safaris' regulated, sustainable-use based hunting program enhances the survival of the lion. Our program helps to preserve and improve available lion habitat. Our anti-poaching program serves to protect and grow the lion's prey base and reduces incidental take of lion by meat poachers. And our community participation and assistance program demonstrates the potential value of wildlife (especially lion) to local communities. Recognizing this value causes the communities to want to protect their wildlife and reduces human-wildlife conflicts.

Signed: _____

Operator Name: Gary Duckworth

Title: Managing Director

Leopard Data 2015/2016
Mokore and Umkondo Ranch
Savé Valley Conservancy



Introduction

Leopards (*Panthera pardus*) are found throughout Mokore and Umkondo Ranches within Savé Valley Conservancy (SVC). Mokore Safaris has been hunting leopard for numerous years as a form of trophy hunting or sustainable utilization. Trophy hunting consists of targeting mature male individuals, and as of more recent, individuals aging older than approximately four (4) years in age. The purpose of this document is to identify randomly selected bait sites and the leopards identified at these specific bait sites.

Method

The Professional Hunter or individual tasked with pre-baiting or baiting for leopard chose a randomly selected bait site in attempt to lure a male leopard into feeding. Due to the fact that females also utilize bait sites, records on any females feeding are also monitored. The selected bait sites are randomly chosen throughout Mokore and Umkondo Ranches. Camera traps or trail cameras are then placed at all bait sites. For identification purposes, it is attempted that all leopards captured feeding with the camera placed in such a manner that the right side of the leopard is photographed. This is however not always possible due to preferred bait site selection. It is thus recorded which side of the leopard pictures are taken of.

Male leopards are given names that aid in either easily identification of the cats or are named as per the bait site that they initially feed on. Females were named simply by property and in numerical order. For example, a female leopard feeding at the Gwezi River bait site on Mokore would be named MF001. If this female had a cub feeding alongside her, the cub would be named MJ001 and would have a recording that the cub belongs to MF001. Where MF is Mokore Female and MJ is Mokore Juvenile. The sex of each leopard was also recorded. For all juveniles the sex is recorded as unknown due to difficulties in identifying sex at a young age.

Photos are saved of all cats recorded either a right side, left side or both sides where possible. If a cat was found feeding on a different bait site, this was also recorded. An estimated age was also assigned to each male that was found feeding. The age was estimated using the Panthera ageing guidelines as well as PH age estimations.



Image 1: Randomly selected bait sites throughout Mokoro and Umkondo Ranches.

Results

Due to the fact that Mokore Safaris utilize two (2) properties, the data is classed into two groups, namely Mokore Leopard and Umkondo Leopard. A total leopard population is also determined due to the fact that holistically the same company treats these blocks as one management unit. It is to be mentioned that the data is based on some of 2015 and all of 2016 hunting season. Majority of the data for 2015 produced errors upon processing. However some data is made available on leopards being taken and locations thereof.

Mokore Leopard

The data gathered for Mokore is based on information gathered by randomly selected bait sites as mentioned above. It can be noted that a large portion of Mokore went without being baited, close on 2 000 ha. For the purpose of this document, this 2 000 ha was not excluded from the total area. It is hypothesized that this will have an effect on the total leopard numbers as well as leopard densities found on Mokore Ranch.

All data is separated into two classes, namely pre and post hunting. It is deemed that other males who in turn will occupy the available territory replace males removed from Mokore.

A. Pre-hunting leopard numbers and densities

Mokore Ranch is approximately 7 841 ha in size. A total number of fourteen ($n=14$) leopard were identified on seven (7) bait sites throughout Mokore. It can be noted that a total number of five (5) bait sites fell in close proximity to the Turgwe River. As previously mentioned, the centre and north-eastern area of Mokore was found free of baits. This does however not mean that no leopard utilize this area. A total number of five (5) males, six (6) females and three (3) juveniles were identified on Mokore.

Densities of Mokore resulted in 560 ha/leopard. Males had an average density of one (1) male per approximately 1 568 ha. Females and Juveniles having an approximate density of one (1) individual per 871 ha.

B. Post hunting leopard numbers and densities

For the purpose of the document, it is concluded that a total number of two (2) male leopards were removed from the population in 2016. This in turn results in a lower density of male leopard for Mokore. This density being approximately 1 000 ha larger per male in post hunting than what it was in pre-hunting conditions. It can however again be mentioned that these available territories will become occupied by other males moving into the area.

Umkondo Leopard

The data collection for Umkondo is done in the same manner as on Mokore. It can also be noted that on Umkondo, no bait sites were place within an area of approximately 1 300 ha in size, namely around the Mokore River west of the main road. This area is adjacent to that of the area that was not baited on Mokore Ranch.

A. Pre-hunting leopard numbers and densities

Umkondo Ranch is approximately 6 736 ha in size. A total number of eleven (11) leopards were identified on six (6) baits throughout Umkondo. A total of number of four (4) males were recorded, five (5) females and two (2) juveniles. A total density of approximately one (1) leopard per 612 ha presented itself on Umkondo. Males had an average density of 1684 ha per Individuals. Females and Juveniles had an approximate density of 962 ha per individual.

B. Post hunting numbers and densities

A single (1) individual was removed from the population on Umkondo Ranch for 2016. As a result of this the male density differs approximately 560 ha greater per individual post hunting.

Combined Data

Combined a total of twenty five (25) leopard were identified, with an approximate density of 583 ha per leopard. Males having an approximate density of 2 429 ha per individual and females and juveniles 911 ha per individual. This data is based on the post hunting data. Numbers and densities will change pre-hunting season 2017 depending on whether or not available territories become occupied. A large area of approximately 3 300 ha has also gone un-baited. This will also affect leopard numbers and densities especially when considering females and possibly juveniles.

Discussion

When considering data pertaining to this document it is important to note that some leopards both on Mokore and Umkondo would have been missed due to numerous reasons. Main reasons are areas being devoid of baits and the possibility of males not feeding on baits is not to be ignored. It is hypothesized that the 2017 pre-hunting season will yield higher numbers and densities of leopards, especially males.

A total number of three (3) leopards were removed from the population in 2016, two (2) on Mokore and one (1) on Umkondo.

Table 1: Identification sheet of leopards on Mokore.

Name	Sex	Estimated age of Male	Juvenile of which Female	Location	Lat	Long
Boma cat	M	3		Boma, Savuli Boundary	398805	7750153
MF001	F			Boma, Savuli Boundary	398805	7750153
JM001	Unknown		MF001	Boma, Savuli Boundary	398805	7750153
The King	M	4		Mdala Pan Balt Site	401161	7744365
Shlabata Cat	M	6		Billys Balt site	405746	7743229
MF002	F			Billys Balt site	405746	7743229
MF003	F			Gwezi Bait Site	406370	7744543
JM002	Unknown		MF003	Gwezi Bait Site	406370	7744543
2 Smile	M	3		Billys Balt site	405746	7743229
MF004	F			Mokore River, Crowned Eagles Nest	406968	7748034
MF005	F			Bow Stream	408794	7743750
Bow Cat	M	4		Bow Stream	408794	7743750
MF006	F			Majewe Weir	402133	7742862
JM003	Unknown		MF006	Majewe Weir	402133	7742862
Muchwa Cat	M	3		Majewe Weir	402133	7742862
*MF	Mokore Female					
*JM	Juvenile Mokore					
	Male removed from Population					

Table 2: Identification sheets of leopards found on Umkondo.

Name	Sex	Estimated age of Male	Juvenile of which Female	Location	Lat	Long
UF001	F			3 spots bait site	408167	7754697
5c	M	4		Umkondo Mine Dam	410765	7752730
Zizi Dip Cat	M	4		Thierrys Bait Site	415070	7755639
UF002	F			Thierrys Bait Site	415070	7755639
JU001	Unkown		UF002	Thierrys Bait Site	415070	7755639
Dick and Balls	M	4		Umkondo/Sango Nothern Boundary	407314	7753919
UF003	F			Umkondo/Sango Nothern Boundary	407314	7753919
UF004	F			Bedford Tanks	410316	7749369
UF005	F			Torchwood Bait Site	416065	7752784
JU002	Unkown		UF005	Torchwood Bait Site	416065	7752784
3 spot	M	5		3 spots bait site	408167	7754697
*UF	Umkondo Female					
*JU	Umkondo Juvenile					
	Male removed from population					



Aging the African Lion

A Training on Aging Lions

Version 1 (May 2016)

Background and Applications

Lions in Africa

As the dominant predator in Africa, the African lion (*Panthera leo*) is highly valued for its ecological role and importance for the tourism industry. However, lions have declined by an estimated 42% over the past 21 years (3 generations) to approximately 20,000 individuals (Bauer et al. 2015). Robust tools for assessing and managing lion population dynamics are critical for survival of the species.

Why Age Lions?

Age is a common metric used throughout the world to guide the management, research and sustainable harvest of many types of wildlife, including large carnivores, ungulates and fish. Knowing an animal's age is critical for accurately estimating key elements of wildlife behavior and life history, such as reproduction, survival, movement and population size. Our ability to successfully conserve and manage wildlife depends on how well we understand each animal's social and biological role, which is closely tied to age.

Implications for Management and Research

Managers use population models based on the age structure of a population to help predict how different management scenarios or environmental stressors might affect the future of a species. Population models project a species' population size based on information about a species' life history, including conception rate, birth rate, survival of young, age at puberty, territoriality and other behavioural characteristics. The age or life stage of an animal is closely tied to its reproduction, survival, behavior, and other aspects of its ecology that can affect population stability. Thus, an animal's age in the context of its population can provide valuable information about the future of a single population and, for threatened species like the African lion, even the species as a whole.

For this reason, age is an important metrics collected by lion researchers. For example, researchers that collar individual lions must be able to accurately age the lions they study in order to understand lion behaviour in a broader context. Ensuring that lions have the natural resources and the protection that they require at different phases of their lives is critical for ensuring their conservation.

Importance for Sustainable Hunting

Lions are the only social big cats in the world. Each pride consists of 4-5 adult lionesses, their dependent cubs, and a temporary coalition of pride males. Pride males play a key role in defending their pride against invading males by forming coalitions of 2-3 males to defend the pride territory through roaring, patrolling, scent marking and aggressively approaching invading males. When new males enter a pride, they often kill cubs (a behavior termed "infanticide") in order to bring lionesses into estrus more quickly so they can produce offspring. Infanticide

Resources

Resources for Learning to Age Lions

The ability to accurately age lions takes time and practice to develop, but is the sign of a dedicated and accomplished expert who understands lion biology. We encourage you to take advantage of the other resources that were developed alongside this training by visiting <http://AgingTheAfricanLion.org>, including:

- Test – Measure your lion aging accuracy
- Photo gallery – Images of known-age lions
- Pocket guides – Quick tips for aging

Before You Begin: Test Yourself!

To see your improvement after taking this training, we encourage you to test your lion aging score online at <http://AgingTheAfricanLion/TestYourself.org>. When you finish the training, test yourself again!

Training

How to Age a Lion

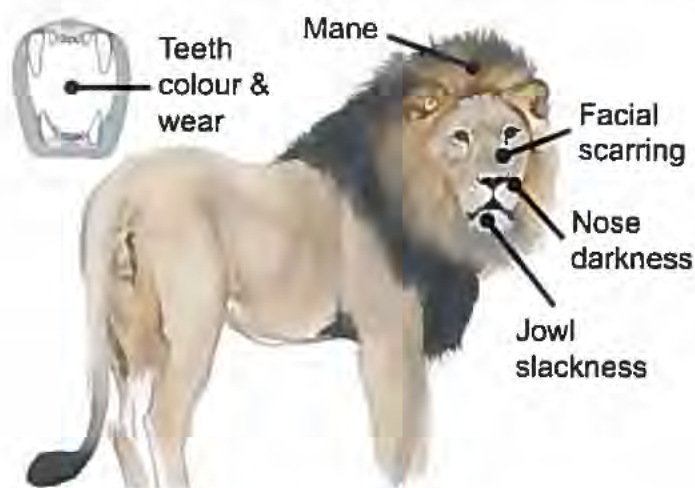
Scientific research on lions across Africa shows that a male lion's appearance changes with five main physical characteristics that can be distinguished into four age classes (Miller et al. 2016):

Aging Characteristics

- Teeth color and wear
- Facial scarring
- Nose darkness
- Mane
- Slack jowl

Age classes

- 1-2 years
- 3-4 years
- 5-6 years
- ≥7 years



Minor variation in each physical characteristic between lions of the same age means that a single trait should never be used alone to determine age: always reference 3-4 characteristics to reliably narrow down a lion's age. This will ensure the greatest accuracy possible.

Aging Characteristics

1. Teeth Color and Wear

Teeth become more yellow and worn with age.



1-2 years
White, sharp



3-4 years
Light yellow,
sharp or lightly worn



5-6 years
Light yellow,
lightly or heavily worn



≥7 years
Dark yellow, lightly
or heavily worn

2. Facial Scarring

Lions acquire scarring and pocketing on their faces due to fighting.



1-2 years
No scarring

3-4 years
No or light scarring

5-6 years
Light scarring

≥7 years
Heavy scarring

3. Nose Darkness

Lion noses darken from pink to black with age.



1-2 years
Mostly pink
0-30% black

3-4 years
Slightly black
20-60% black

5-6 years
Mostly black
40-70% black

≥7 years
Nearly all black
40-100% black

Next Steps

Photo Galleries & Pocket Guides

After finishing this training, check out the other resources available at

<http://AgingTheAfricanLion.org>:

- Test – Measure your lion aging accuracy
- Photo gallery – Images of known-age lions
- Pocket guides – Quick tips for aging

After You Finish: Re-Test Yourself

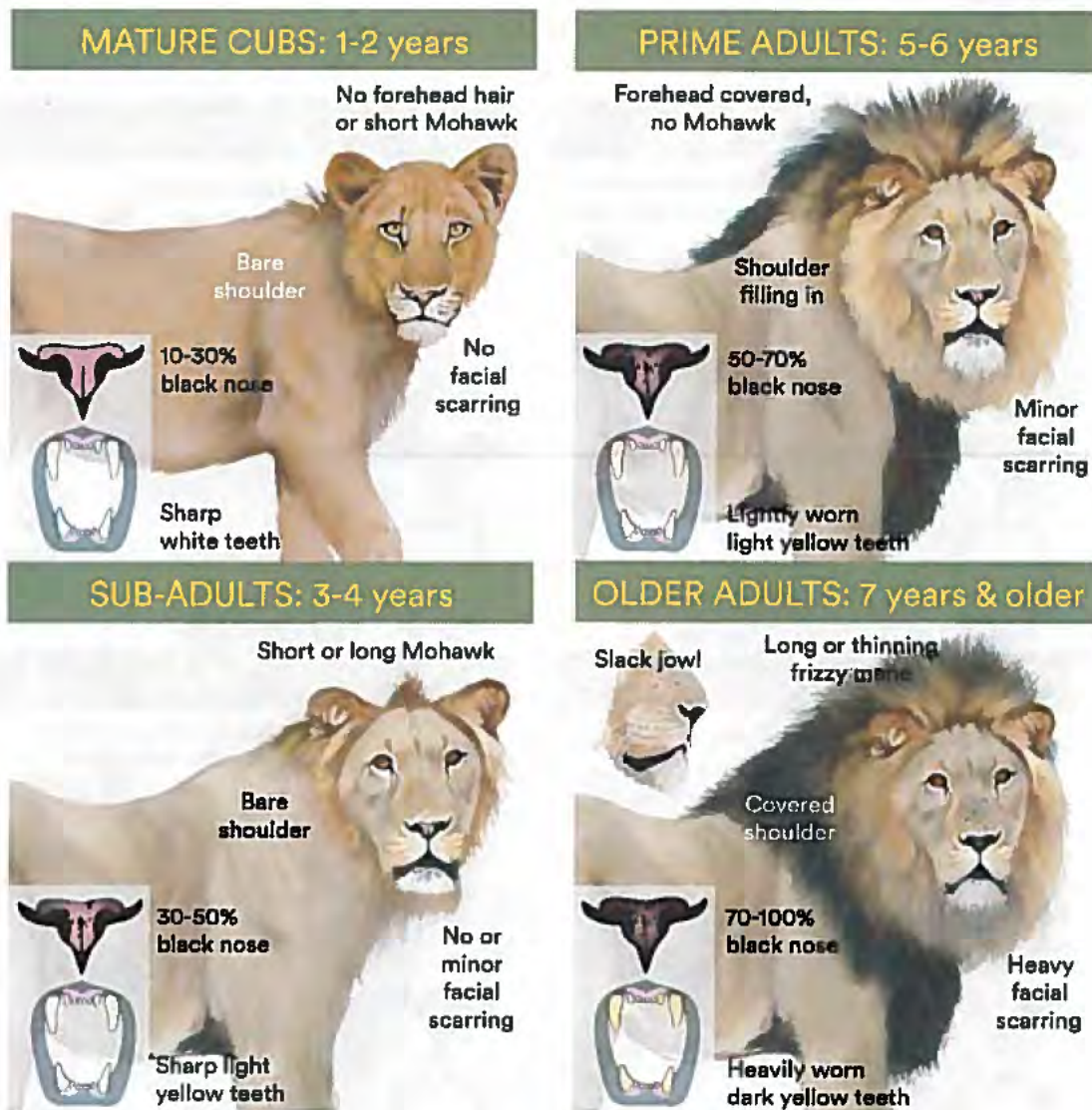
To see your improvement after reviewing this training and the online photos and pocket guides, re-test your lion aging accuracy online at

<http://AgingTheAfricanLion/TestYourself.org>.

Pocket Guides

Pocket guides to use for quick reference in the field are available on the last pages of this course packet and online at <http://AgingTheAfricanLion.org/Resources.html>

Quick Guide to Southern and High-Lying Africa (e.g. Hwange in Zimbabwe, Serengeti in Tanzania)



Available as complete pocket guide at <http://AgingTheAfricanLion/Resources.org>.

Mokore Safaris PH Rules

1. Fuel – All incoming PHs must refuel in the last available garage on the way in and then again on the way out. The receipt from the way out is to be handed in at Mokore Safaris offices for a refund. Please do not arrive in camp with empty tanks and then expect to be refuelled before leaving. For Save Valley hunts please refuel at Nyika on the way in. For Sengwa Hunts please refuel at Gokwe.
2. Paperwork – Please can all PHs fill in the skimmers books complete with all measurements and details. Also those hunting in Sengwa please make sure that the measurements of all trophies is completed on the ZPWMA kill returns supplied in the file.
3. Mokore Safaris is attempting to maintain the quality of our herds for the future and so the following will apply (no excuses tolerated):
 - a. Any soft – top buffalo will attract a fine as follows:
 - i. Over 43" spread - \$1000
 - ii. 40 – 43" spread - \$500
 - iii. 35 – 40" spread - \$ 200
 - iv. Below 35" – fire at will!

- b. Any lion under the age of 5 years - \$ 10 000
- c. Any sable without at least 2" secondary thickening - \$200
- d. Any elephant under 40 lbs in the Save - \$500

SVC Predators 2015

When considering species such as Lion, Leopard and Spotted Hyena, all which are Trophy hunted within the SVC, it is clear that hunting has aided the conservation of these species (Groom 2012). Population trends below show slight fluctuation and a steady increase of Lion and Leopard within the SVC. *The recent decrease in Spotted Hyena numbers can be contributed to a rapid increase in lion numbers and species competition.* Further details can be seen in *Lion Hunting in Zimbabwe's Savé Valley Conservancy, A Conservation Success Story*, Dr Rosemary Groom, African Wildlife Conservation Fund.

Populations of Lion (*Panthera leo*) , Leopard (*Panthera pardus*) and Spotted Hyena (*Crocuta crocuta*) can be depicted as follows:

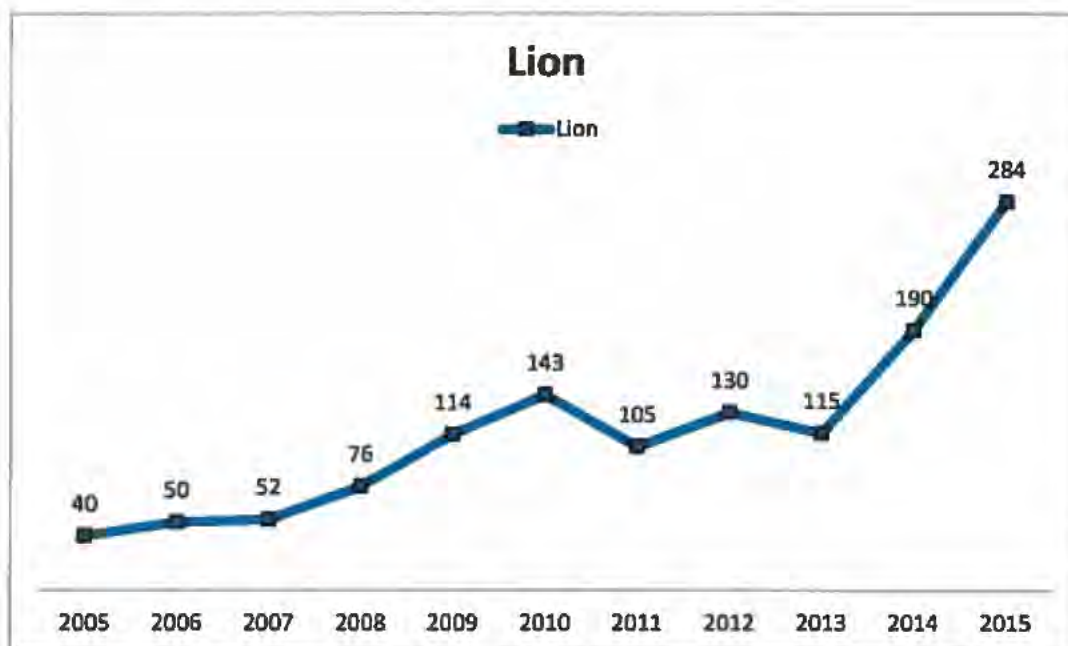


Figure 1: Population trends for Lion of the SVC from 2005 to 2015.

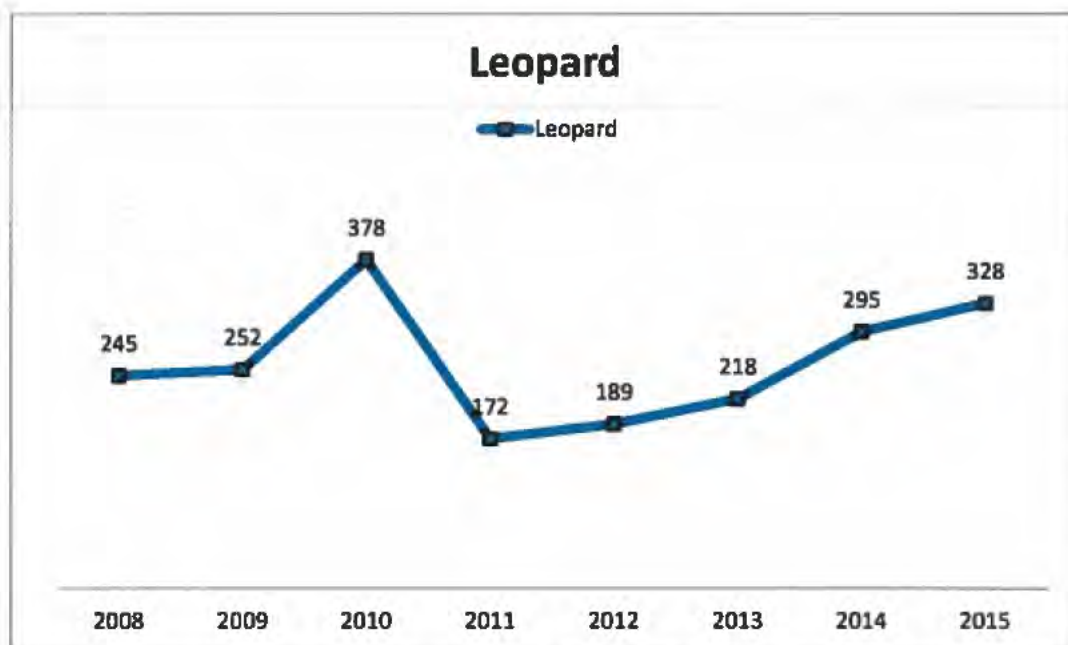


Image 2: Population trends of Leopard for the SVC from 2008 to 2015.

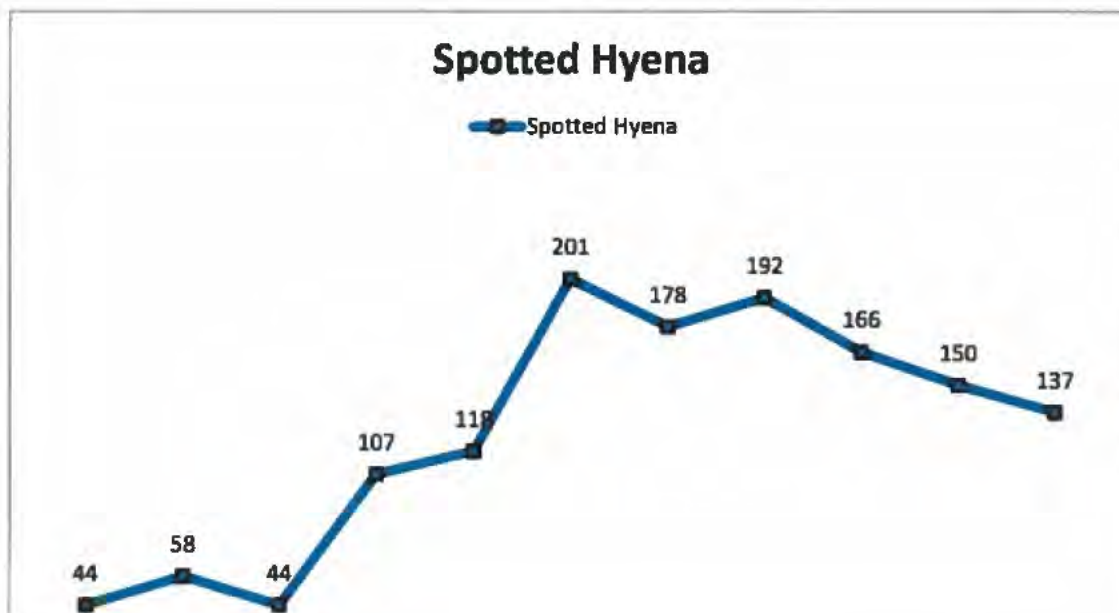


Image 3: Population trends for Spotted Hyena of the SVC from 2005 to 2015.

Mokore Safaris - African Horizons Inc. Price Guideline for 2018

ZIMBABWE

No. of Days	Description of Safari	US\$
5 day	Non-trophy Buffalo Package (Below 34" and Non-exportable)	\$8,500 Package
5 day	Non-trophy Buffalo Package (Below 34" and Exportable)	\$9,500 Package
7 day	Plains game Mokore	1x1 - \$550/Day
7 day	Plains game Mokore (2 Clients per 1 Pro-Hunter)	2x1 - 500 each/Day
7 day	Plains game Mokore Bowhunt	1x1 - \$500/Day
7 day	Plains game Mokore Bowhunt (2 Clients per 1 Pro-Hunter)	2x1 - \$450 each/Day
7 day	Plains game Mokore Bowhunt (3 Clients per Pro-hunter)	3x1 - \$400 each/Day
7 day	Plains game Sengwa	1x1 - \$750/Day
7 day	Plains game Sengwa (2 Clients per 1 Pro-Hunter)	2x1 - 700 each/Day
7 day	Non-trophy Elephant (Cow, Non-exportable)	\$12,000 Package
7 day	Hippo/Crocodile	1x1 - \$1,300/Day
10 day	Sable/Plains game	1x1 - \$1,000/Day
10 day	Tuskless Elephant/Plains game	1x1 - \$1,000/Day
12 day	Tuskless Elephant/ Buffalo/Plains game	1x1 - \$1,300/Day
10 day	Buffalo/Plains game	1x1 - \$1,300/Day
10 day	Buffalo/Plains game (2 clients per Pro-Hunter)	2x1 - \$1,250 each/Day
15 day	Leopard/Plains game	1x1 - \$1,500/Day
15 day	Buffalo/Sable/Plains game	1x1 - \$1,300/Day
15 day	Buffalo/Leopard/Plains game	1x1 - \$1,750/Day
18 day	Buffalo/Leopard/Sable/Plains game	1x1 - \$1,750/Day
12 day	Elephant/Plains game Mokore	1x1 - \$1,500/Day
12 day	Elephant/Plains game Sengwa	1x1 - \$1,000/Day
15 day	Elephant/ Buffalo/Plains game	1x1 - \$1,500/Day
21 day	Lion/ Buffalo/ Tuskless Ele/ Sable/Plains game	1x1 - \$2,500/Day
28 day	Lion/ Elephant/ Buffalo/ Tuskless Ele/ Sable/Plains game	1x1 - \$2,500/Day

Observer Fees - US\$250 per person per day

CITES permits for elephant, leopard and crocodile: \$150 each

Pre-baiting for cat or crocodile hunts: \$300 per day + bait trophy fees

Vehicle Transfers - \$500 one way/vehicle

Conservation Levy - \$20/person/day

+8% Gov levy on total daily rates and trophy fees

All Cat or Elephant hunts on Private Land now need a Parks Ranger - \$100/day that he is needed

TROPHY FEES

	US\$		US\$
Elephant Bull - Mokore	15,000.00	Zebra Bait (Mokore only)	500.00
Lion	15,000.00	Bushpig	500.00
Elephant Bull - Sengwa	12,500.00	Warthog	500.00
Leopard	7,500.00	Carniel	500.00
Sable	5,000.00	Antbear	450.00
Hippo	5,000.00	Honey Badger	450.00
Buffalo	5,000.00	Grysbok	375.00
Crocodile	4,500.00	Serval	350.00
Tuskless Elephant	4,000.00	Civet	500.00
Nyalu	4,000.00	Drinker	290.00
***Waterbuck	2,400.00	Jackal	275.00
Buffalo Cow	2,000.00	Impala males	250.00
Eland	1,950.00	Genet	225.00

ANOTHER FINE EXAMPLE OF CONSERVATION THROUGH SUSTAINABLE AND ETHICAL HUNTING.

Prior to 2002, Coutada 9, like all other wilderness areas in Mozambique, had been through over 25 years of civil war and rampant poaching. This massive area (4333 square kilometres) was left virtually devoid of wildlife. Furthermore, the area suffered serious habitat destruction, being subjected to annual late season bushfires and the indiscriminate cutting of trees through “slash and burn” agricultural practices. In 2002, Rio Save Safaris, took over the concession and set out to rehabilitate the area to its former glory. Firstly, they needed to take control of the massive poaching epidemic and provide surface water for the very limited remaining wildlife.

Over the past 13 years RSS has drilled 22 boreholes and constructed 12 large dams, these provide permanent surface water for the wildlife in Coutada 9. This water is essential for life and all species benefit, including birds, smaller mammals as well as insects. The construction of these dams has been a lengthy and expensive exercise.





Some of the completed dams on Coutada 9 creating permanent surface water for the wildlife.

Since 2003 RSS anti-poaching teams have consistently removed over 1000 gin traps per year, caught on average 150 poacher per year and confiscated numerous homemade muzzle loader rifles as well as a few modern assault weapons like AK 47's from poachers. For EVERY weapon confiscated, poacher apprehended or trap removed RSS have paid an incentive bonus to the anti-poaching units. Due to these continuous efforts, the wildlife has thrived and flourished, to the stage where most populations have reached sustainable population densities.



A year's haul of traps and guns with some of RSS anti-poaching game scouts.



An elephant bull poisoned by villagers where nothing from the animal was utilised and one of the 150 poachers arrested annually by RSS anti-poaching units with his traps. Most poaching is done for commercial use and totally unsustainable.

Some species populations, however were so low that RSS set out to re-introduce these species. Not a small feat in itself considering no importation of wildlife or inter-area game transfers had ever taken place in Mozambique.

After 18 months of tireless negotiations, RSS imported 10 lions in September 2009 from Phinda Game Reserve in South Africa. They were transported and successfully released them into Coutada 9 over 1600 km away. They have settled and are breeding well in the coutada.



Waterbuck numbers, a species that once thrived in Coutada 9, were down to a mere handful after the civil war. RSS made a deal with Gorongosa National Park to swap 20 Zebra and 40 eland for 146 waterbuck. GNP got to increase their eland and zebra populations and C9 received 146 waterbuck in September 2013. Waterbuck are now seen daily and breeding well.



Eland from Coutada 9 being released into Gorongosa National Park and the replacement Waterbuck into C9.



Waterbuck and eland successfully released .

A key priority from the outset, was to boost the local remnant buffalo population and after more than 10 years of trying to source buffalo from surrounding countries as well as within Mozambique. RSS was FINALLY granted permission from the Mozambique government to capture 50 buffalo as a trial from the Zambesi Delta reserve. This was finally achieved in 2015. The 50 buffalo are safe and sound in Coutada 9 with plans now to capture a further 250 next year.



The first 50 buffalo in their quarantine bomas, November 2015.

These projects and all other developments such as building of road networks, Safari Camps and staff accommodation to date have been funded through trophy hunting. RSS operates on a strict sustainable offtake quota where a small percentage, normally 2-5% of a population, is harvested. These animals are usually males past their prime and their removal has little impact on the overall species population.

All funds raised through trophy hunting to date, have gone back into the conservation and development of this magnificent area as well as to support the local communities. Unfortunately due to the remoteness of the concession and thick bush, photographic tourism is very limited and not a feasible option for this area.



RSS employ 50 game scouts for anti-poaching alone as well as another 60 plus people for all other development work required. This in turn provides over 100 families with a reliable source of income and food annually.

Of the animals harvested 25 % of the trophy fee received from foreign hunters goes directly to the local communities. RSS also supplies most meat to the community either directly through delivering it to the local villages or indirectly through issuing it to the staff working within the Coutada. The meat from ALL animals harvested is FULLY utilised, including lions, baboons and especially elephant.



RSS has also built a school, clinic and drilled boreholes for the surrounding communities. Many of our hunting clients have made donations to the school personally or in the form of delivering SCI Blue Bags.

Poaching, as opposed to legal trophy hunting, is indiscriminate, without regard to age, sex or species of animals killed. There is no respect for boundaries or numbers of animals harvested and if not constantly policed there WILL be no wildlife left. The general modus operandi of the poachers in this region is hunting with homemade gin traps or snares which is very cruel. When RSS initially arrived in Coutada 9 almost every animal harvested by hunters was missing a foot from these traps.

Basically, the animal once trapped will drag the trap around for 3 -4 days until the poachers catch up to it and kill it with an axe or spear. Some species such as lion, buffalo, leopard and elephant that they cannot kill due to the danger aspect with their axes are left to drag these traps around for weeks until the animal dies either from starvation or from infection. Sometimes the animal's foot rots, breaks or is bitten off. These survivors are then crippled for life, or slowly lose condition and die.



One male lion had three of its four limbs injured from traps. Thanks to hunter supported anti-poaching efforts there are far fewer cases of injured animals but still a massive and continual problem.



An eland with a trap on that escaped the poachers with two axes embedded in it and a baby elephant that had to be put down after dragging this trap for over a week.



A buffalo cow that was caught in a trap that was put down after a week and one of several elephant poached annually for their ivory.



A mature lioness and a sub adult lioness that both died from these traps.



A young male lion that was caught with a trap, after a week it's foot rotted off and is now walking around with only 3 feet.





The illegal cutting of hardwoods for planking is another massive problem and the RSS anti-poaching team is heavily involved in trying to protect all the beautiful hardwoods on Coutada 9.

The only donations received to date have been from the hunting organisations, Dallas Safari Club and Safari Club International. RSS would like to thank them both for helping us save the animals and habitat on Coutada 9.

A massive THANK YOU to all the hunters who in following their passion for adventure in wild Africa. Have saved thousands of animals in Coutada 9, provided employment and income for many families as well as fed thousands of local villagers over the past 13 years. None of the animals pictured here have names but hunters are the **ONLY** ones fighting to save these remote and wonderful areas and their wildlife. Your continued support of sustainable hunting is greatly appreciated.



Pictured above is 1306 gin traps, 68 cable snares, 9 can rat traps and 25 homemade muzzle loaders that were collected by our RSS anti-poaching team in 2015 alone. This anti-poaching effort alone costs RSS over US\$100 000 annually, all of this comes from sustainable hunting.





Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name Morris	1.b. First name Brandon	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No.	4. Occupation	5. Other information as (see instructions)
6.a. Telephone number (b) (6)	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (dba)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information			
1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes) (b) (6)			
1.b. City Shreveport	1.c. State LA	1.d. Zip code/Postal code: (b) (6)	1.e. Country/Province USA
2.a. Mailing Address (include if different than physical address; include name or contact person if applicable)			
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. Country/Province
2.f. Country			

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 174532988C/9 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.	
Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) [Signature]	Date of signature (mm/dd/yyyy) 02/15/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
- Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera Leo Lion

- Sex (if known).

Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:

- Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

*Zimbabwe Property name: Senuko 2 Hunting company: Senuko Ranching LTD
GPS S 20 38 386 E 032 38 386*

- Date wildlife is to be hunted:

May 25th to June 14th of 2018

- Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

Skin, skull, claws

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

N/A

- Date wildlife was hunted:

N/A

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

N/A

- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

N/A

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Trophy Consultants International
Business Name:
Address: 4 Josiah Chinamano Rd
Address:
City: Belmont
State/Province: Bulawayo
Country, Postal Code: Zimbabwe

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  _____ Date: 2-15-18

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Houston, TX

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

Same as page 1

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Darbi Rice

(b) (6)

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

RCVD FEB 27 2018

DOCUMENT IS PRINTED ON CHEMICALLY REACTIVE PAPER - THE BACK OF THIS DOCUMENT INCLUDES A TAMPER EVIDENT CHEMICAL WASH WARNING BOX

CITIZENS NATIONAL BANK
Bossier City, Louisiana 71171-6266

84-352/1111

2/16/2018

PAY TO THE ORDER OF U.S. Fish and Wildlife Services

\$ **100.00

One Hundred and 00/100

DOLLARS

U.S. Fish and Wildlife Services

VOID AFTER 120 DAYS

AUTHORIZED SIGNATURE

MEMO

Brandon T. Morris lion permit application

(b) (6)

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

March 4, 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

RCVD MAR 15 2018

Re: Applications for Import of Sport-Hunted Lion Trophies

Dear Chief Van Norman:

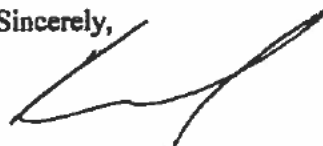
Enclosed please find three applications to import sport-hunted lion trophies. The first applicant is hunting in South Africa, at Khamab Kalahari Game Reserve, an area that has been designated to have "wild" lion by South Africa's Department of Environmental Affairs. Please refer to the attached list and information in the DMA's files, which includes the management plan for this reserve. The applicant is lawfully hunting a lioness as a population control measure, as explained in the attached justification. Please consider that information and the information previously submitted by South Africa's DEA and Conservation Force in making a positive enhancement finding for this applicant.

The second applicant is hunting in Tanzania with Rungwa Safaris/Bunda Safaris. This operator has submitted an enhancement report, which was sent to the DMA in October 2016 and is attached for ease of reference. Please consider that information and the information previously submitted by Tanzania's Ministry of Natural Resources and Tourism/Wildlife Division/Tanzania Wildlife Management Authority and Conservation Force in making a positive enhancement finding for this applicant.

The third applicant is hunting in Zimbabwe in the Dande South concession. This concession incorporates extensive anti-poaching and community investment. We will shortly submit an enhancement report from this operator. Please consider that information and the information previously submitted by Zimbabwe's Parks and Wildlife Management Authority, Conservation Force, and others in making a positive enhancement finding for this applicant.

Please do not hesitate to contact us if you have questions.

Sincerely,



Regina Lennox

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III, Regina Lennox, and other attorneys of the non-profit law firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed African lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that Conservation Force be copied with all correspondence, acknowledgements, notices, and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
cf@conservationforce.org

Signed: _____

Name: _____

Date: _____

(b) (6)

Stephen Wright
Stephen Wright
2/18/18



Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

MAR 15 2018

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

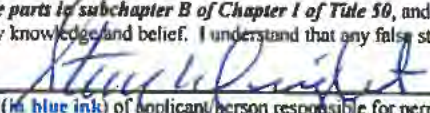
Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

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 Wright	1.b. First name (b) (6)	1.c. Middle name or initial Stephen	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No.	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number (b) (6)	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (dba)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information			
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)			
1.b. City Amarillo	1.c. State TX	1.d. Zip code/Postal code (b) (6)	1.e. County/Province
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)			1.f. Country USA
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province
			2.f. Country

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: un known No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) 2/18/28 Date of signature (mm/dd/yyyy)	

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (*Appendix I of CITES and/or ESA*)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
Panthera leo melanochaita
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
Tanzania, likely Rungwa Mpera
 - b. Date wildlife is to be hunted:
August 2019
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
Skin, skull, claws
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
 - b. Date wildlife was hunted:

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:
4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Rungwa Game Safaris/Tanzania Bundu Safaris
Business Name: 1-Sable Village
Address: Kisongo, Arusha
Address: Tanzania
City:
State/Province:
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  Date: 2/18/18

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).
9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):
10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.
- ☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.
11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?
- ☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

(b) (6)

(b) (6)

DATE 2-18-2028

PAY TO THE ORDER OF

US Fish + Wildlife

\$ 100.00

One hundred & ⁴⁰/₁₀₀

DOLLARS 



HAPPY STATE BANK
AND TRUST COMPANY

FOR

(b) (6)

Stacy H. [Signature]

WHITE CO C

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

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SHANE MAHONEY
RENEE SNIDER

March 22, 2018

ROUD MAR 27 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: LA
5275 Leesburg Pike
Falls Church, VA 22041

Re: Applications for Import of Sport-Hunted Trophies

Dear Chief Van Norman:

Enclosed please find four applications to import sport-hunted trophies.

- The first applicant is hunting a lion in Namibia at Kalahari Game Lodge, a 400 km² property that borders the Kgalagadi Transfrontier Park. This property maintains an increasing population of wild lion. The property is fenced on one side, and species must be managed to conserve the biodiversity and maintain the lion population and habitat quality. The property has identified two lion this year suitable for hunting. The hunting will generate revenues to be reinvested in wildlife management, poaching control, and local employment. Please see the attached letter from the landowner, and please consider this information and the information submitted by Namibia's Ministry of Environment and Tourism in making a positive enhancement finding for this applicant.
- The second applicant is hunting an African lion in the Selous Game Reserve, Tanzania, with Rungwa Game Safaris. We previously provided an enhancement report from Rungwa Game Safaris and have enclosed it again for ease of reference. This company invests heavily in anti-poaching and community livelihoods. Its areas maintain healthy lion populations, and the company abides by a six-year age restriction on trophies. Please consider the enhancement report and the other information provided by Tanzanian authorities and Conservation Force in making a positive enhancement finding for this applicant.
- The third applicant is hunting elephant and lion with Mopane/Nyamvu Safaris in Zambia in 2018 and 2019, respectively. We previously submitted operator enhancement reports from these companies and have enclosed the reports again for ease of reference. These companies together invest over \$61,000/year in anti-poaching, \$45,000/year in community projects, and \$30,000/year in game meat distributed to rural villages. In their concessions, the companies are securing elephant populations and lion prey species from poaching. The companies are recovering populations that had suffered from bushmeat poaching. The companies are enhancing the survival of elephant and lion by addressing the primary threats to each species. Please consider the enclosed enhancement reports and the information provided by Zambian authorities and Conservation Force in making a positive enhancement finding for each of these applications.

Please do not hesitate to contact us if you have questions about these applicants or need further information.

Sincerely,

Regina Lennox

3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: Name: Dwight (b) (6) Drew BruntDate: 3/10/18



Department of the Interior
U.S. Fish and Wildlife Service

RCVD MAR 27 2018

OMB Control No. 1018-0093
Expires Rev. 08/31/2020

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:

**IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)**

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name Van Brunt	1.b. First name Dwight	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (dba)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/Initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information				
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address) (b) (6)				
1.b. City Kalispell	1.c. State MT	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province	1.f. Country USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50 , and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.	
Signature of applicant Principal Officer for permit (No photocopied or stamped signatures)	Date of signature (mm/dd/yyyy) 03/19/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (*Appendix I of CITES and/or ESA*)

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- (1) Is raw, processed, or manufactured;
- (2) Was legally obtained by the hunter through hunting for his or her personal use;
- (3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- (4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
 - (i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
 - (ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
 - (iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.
2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?
John Jackson, Conservation Force, (504) 837-1233, cf@conservationforce.org
3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No ☒ Yes ☐

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

- a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
Panthera leo melanochaita - lion
- b. Sex (if known). Male

5. IF ANIMAL IS CURRENTLY LIVING IN THE WILD, please enter the following information:

- a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

Namibia, Kalahari Game Lodge, Karas Region, 25 29'5.22 S, 19 52'37.08 E

- b. Date wildlife is to be hunted: April 28 - May 13, 2018

- b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
Jamy Traut Hunting Safaris, Jamy Traut

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

- b. Date wildlife was hunted:

- b. Name of hunting outfitter, safari company, or professional hunter you hunted with:

- c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

- 7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). N/A - Not yet hunted

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:

Business Name:

Address:

City:

State/Province:

Country, Postal Code:

Jamy Traut Hunting SAFARIS
Farm GRAVENSTEIN 65
Windhoek, Namibia 9000

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

- a. Do you have any information regarding the population status or trend data on the species hunted?

According to the landowner, Kalahari Game Lodge, the lion population on their property is wonderfully stable and increasing. In fact, population has increased to the point that at least two large males we killed in territorial disputes in 2017.

- b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

All trophy fees from this hunt will be used by the landowner to enhance the lion population on the property. Primary applications will be habitat improvement (permitting lion prides to spread to portions of the property currently unused, thereby reducing conflicts) and the continuance of ongoing study. I have paid \$20,000 to the professional hunter long ago and will be paying another \$30,000+ to the landowner prior to the hunt.

- c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

The landowner is a wonderful steward of the tremendous wildlife species and population which inhabit their 250K acres. The lion population has been carefully monitored and studied for years. The situation is somewhat pressing, as both population growth and conflict have resulted in the death of at least two mature males in recent months. No lion hunting has taken place for over three years, but the landowner now believes the best course of action is to permit the hunting of one old male to relieve some of the stress on the population, with the hunting fee earmarked for habitat improvement and continued study. The landowner feels that if an old male is not taken soon, that additional conflict will occur and the opportunity lost forever.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies and two elephant trophies within the same calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ **Date:** _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  **Date:** 03/19/2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

All international shipment(s) must be imported through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).



kalahari

GAME LODGE

NAMIBIA

15 March 2018

To Whom It May Concern,

Enhancement of free roaming Kalahari Lions

The Kalahari Game Lodge (herein KGL) is a private game lodge of 40,000 contiguous hectares bordering the Kgalagadi Transfrontier Park on Namibia's south-eastern border. More specifically, it is approximately 18 kilometers west of the Mata-Mata border post.

While primary commercial activities include game viewing, 4x4 drives, hiking, birding and other tourism activities, KGL has a well-established history of being professionally hunted for plains game and lion. Hunting is not only a meaningful source of revenue, but entirely necessary in order to keep populations balanced and in check. Jamy Traut of Jamy Traut Hunting Safaris has exclusively conducted these hunts since 2011.

At this time, KGL has determined it necessary to take out four lions in order to balance with available food (prey) and habitat (territory size). At least two adult/mature male lions were killed in territorial disputes in 2017, and we believe it now necessary to remove two additional adult males and two adult females as quickly as possible in order to avoid further conflict and loss. These internal population conflicts and potential risks of migration of surplus lions to neighbouring areas where livestock is a major source of income, has been recognized by the Namibian Ministry of Environment and Tourism, and they have granted KGL with permits to hunt two lions during 2018.

Current population – KGL closely monitors lion population numbers. The population is growing dynamically due to natural recruitment (birth) and migration.

KGL currently supports a population of approximately 22 wild lions, distributed as follows:

1 x males age 10+ years
1 x males age 6-9 years
4 x males age 3-5 years

4 x females age 6-9 years
4 x females age 3-5 year

8 x additional lions age under 3 years males & Females

Vat Number: 0040130015 | Reg Number: 85/02652

Kalahari Gemsbok Ranch (Pty) Ltd.

Tel: +264 63 252 052 | Email: info@kalaharigamelodge.com.na | Web: www.kalaharigamelodge.com.na
Physical Address: Route C15, Mata-Mata, Karas Region, Namibia

Direkteure / Directors: D.E. Dreyer



kalahari

GAME LODGE

NAMIBIA

Migration – KGL border is fenced and has been for many years. Even with constant monitoring, maintenance and improvement, lions are still entering the property. This recruitment causes immediate conflict with and imposes stress upon existing prides. Given the nature of lions, mortality of both cubs and mature males has become a pressing concern.

Summary – Authorized by the Namibian Government, KGL will be able to selectively remove two adult lions this year. Doing so will provide a significant amount of revenue that will be turned back to the property for game management, relieve stress on the existing lion and plains game populations and contribute also contribute to local employment.

Kind Regards,


DE Dreyer

Vat Number: 0040130015 | Reg Number: 85/02652

Kalahari Gemsbok Ranch (Pty) Ltd.

Tel: +264 63 252 052 | Email: info@kalaharigamelodge.com.na | Web: www.kalaharigamelodge.com.na
Physical Address: Route C15, Mata-Mata, Karas Region, Namibia

Direkteure / Directors: D.E. Dreyer



kalahari
GAME LODGE
NAMIBIA





kalahari
GAME LODGE
NAMIBIA

+ ECOLOGY

+ SPECIES

- REHABILITATION AND CONSERVATION

The Kalahari Game Lodge and its surrounding 40 000 ha was previously used for farming sheep and cattle. As a result, the livestock fences had to be removed before wildlife could be re-established.

Accordingly, the lodge initiated a number of restoration projects to restore the natural grassland to its unadulterated state and reintroduce the wildlife that naturally occurred in this area. The aim is to restore the Kalahari eco-system that was largely destroyed by farming, which disbursed much of the natural wildlife in Namibia's Kalahari Desert.

Currently, Kalahari Game Lodge is home to the only population of free-roaming Kalahari lion in Namibia. Our aim is to create a conservation area in which these magnificent animals are protected amid surrounding farmlands.

A unique feature of the male lions is their often very dark to almost pitch black manes. This is due to the specific genetic make-up of the Kalahari lion population; accordingly, we are careful not to introduce other genealogies to the region. To see the magnificent beasts in their natural habitat is indeed a wonderful and memorable experience!

In addition to the black-mane Kalahari lion, the lodge is also home to a number of endangered species that roam the dunes. Among them are the brown hyena, pangolin, African hedgehog, and the striped polecat.





kalahari
GAME LODGE
NAMIBIA

About



Reaching the Kalahari Game Lodge
Namibia

Accommodation

The Lodge

Campsites

Rates

Facilities

Activities

Lion Tracking

Game Viewing

4x4 Drives

Dune Braai

Hiking

Birding

Wildlife and sustainability

Ecology

Species

Rehabilitation and conservation

Gallery

Lodge and Campsites

Wildlife

Activities



MAR 27 2018

(b) (6)

3/19 2018

(b) (6)

Pay to the
Order of

U.S. Fish & Wildlife Service

\$ 100.00

One hundred & 00/100

park side

DOLLARS

park side
CREDIT UNION

Flathead Valley | Montana
406-862-2652 | 406-728-4475
parksidecu.com

CREDIT UNION

FOR

L. Van Buren

(b) (6)

APR 13 2018



Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

**IMPORT OF SPORT-HUNTED
TROPHIES
(Appendix I of CITES and/or ESA)**

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link: .

Section A: Complete if applying as an individual

1.a. Last Name PANTELIDIS	1.b. First Name ANASTASIOS	1.c. Middle Name/Initial N/A	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) (b) (6)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address


Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)				
1.b. City WATERFORD	1.c. State OH	1.d. Zip code/Postal code (b) (6)	1.e. County/Province	1.f. Country U.S.A.
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

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.
<div style="display: flex; justify-content: space-between;"> <div>  Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) </div> <div> 04/04/2018 Date of signature (mm/dd/yyyy) </div> </div>
Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (*Appendix I of CITES and/or ESA*)

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
 - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
 - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
 - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

Same as page 1

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Same as page 1

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

☒ No

☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

1) Panthera leo melanochaita, lion 2) Crocodylus niloticus, Nile crocodile 3) Imbabala-Tragelaphus scriptus, bushbu

b. Sex (if known).

1) male 2) male 3) male

5. IF ANIMAL IS CURRENTLY LIVING IN THE WILD, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

o

N/A

b. Date wildlife is to be hunted:

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

Country of Mozambique, Province of Tete, District of Zumbo, City of Zumbo,
Ranch: Chawalo Safaris Lodge in Zumbo, Tete, Mozambique

b. Date wildlife was hunted:

Lion was harvested on 7/30/2016
Crocodile was harvested on 8/02/2016
Bushbuck was harvested on 8/03/2016

- c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Outfitter/guide was Russell Lovemore and Jaco Strauss from Chawalo Safaris

- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

EMIAC MOZ LDA
COMPLEXO TESTAFRICA
BAIRRO DA SOALP
CHIMOIO
MOZAMBIQUE

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

All permits/licenses were held and managed by the outfitter.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Senta Van Antwerp
Business Name: EMIAC MOZ LDA
Address: COMPLEXO TESTAFRICA
City: BAIRRO DA SOALPO
State/Province: CHIMOIO
Country, Postal Code: MOZAMBIQUE

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

- a. Do you have any information regarding the population status or trend data on the species hunted?

SEE ATTACHED SHEET

- b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

SEE ATTACHED SHEET

- c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

SEE ATTACHED SHEET

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature:  _____ Date: 4/4/2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from the list of designated ports. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9) a. Do you have any information regarding the population status or trend data on the species hunted?

I do not have any official data on this. What I can say and it will be repeated below, is the fact that we have been incredibly successful in curbing poaching. In the 7 years that we have operated and hunted on Chawalo game numbers have increased dramatically. Our area reaches 800 000 acres in extent, as per safari we were aware of 4 different lion males as well as several females moving within our limited coverage of the area. If we were to consider the average home range of lion males specifically there is every reason to be extremely optimistic in terms of numbers as we covered a total area of roughly 70 000 acres on this safari.

We have subscribed to the ethics and standard of only utilizing lion males of 7 years and older which research has proven as conducted in Tanzania limits and virtually nullifies infanticide, by continuing with these basic management principles as well as the highly controlled off take of 1 lion male per annum on a total of 800 000 acres, there is no reason to assume that our population is under stress or pressure. Furthermore every specie hunted is inspected and aged by means of jaw, should we be deemed to harvest juvenile or continually harvesting prime breeding animals our quota will be reduced for the following season, taking females by accident or mistake is also punished with heavy fines in excess of \$5000.

b. In order to hunt, you likely paid for licenses or trophy fees. Do you have any information on how those funds were used by either the landowner, community, or government?

Yes, we did pay for hunting licenses and tag. One third of the tag fees go to the local population, that inhabit the area and villages on the periphery, one third goes to the Tchuma Tchatu program a program that train and equip scouts to protect the area. So this very program train and equip Scouts that compliment our scouts on the ground to curb poaching.

Tchuma Tcatu is a community program, these communities would have zero benefit from wildlife that they share the areas with and I shudder to think what would happen if this incentive or program was to be abolished.

In short these areas would turn to livestock land and we would effectively lose wildlife habitat as the wildlife occurring in these areas would turn into a liability to local communities, this program has been successful to the point of giving wildlife a tangible value within local communities, in cooperation with us as outfitters operating on these areas.

A portion of funds generated from foreign hunting activities by the outfitter also gets paid to the community by the outfitter once a year in November or December and there is a local committee that decides how these funds will be spent within the conservation area as there are ten villages that need to benefit from this. It is used for schools, clinics, water wells and the like. We have also received donations from SCI and they have built and mobilized a clinic which operates on our western

boundary, on the Luangwa river. We have been extremely successful in involving our local communities in a positive way, I can not stress the importance of community involvement enough, in an impoverished country such as Mozambique this is the of the utmost importance.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

As outfitter we have initiated a program whereby a community levy is asked from each foreign hunter this over and above funds generated from the community tax levied to each hunter, is then applied to also improve and benefit the local community on condition that they assist in the protection of the local wildlife by assisting in limiting poaching, controlling the wild fires primarily.

They will also receive rewards and benefits for sound information provided on Lion, Leoapard and elephant movements in the area.

Currently we employ a total of 25 full time anti-poaching scouts these scouts are paid for by the outfitter and inherently by our hunting clients, we have succeeded in curbing poaching to a large degree with countless muzzle loaders (homemade) as well as snares and other equipment used for poaching being confiscated on information supplied directly by members of our local community, and also from our armed - mobilized anti-poaching teams. There is no doubt that poaching could be brought to a complete stop if we were able to encourage more hunters to venture into our area in Mozambique.

As a further note when we took over the area 7 years ago we had knowledge of roughly 40 buffalo, we now have a solid heard of around 250 around camp with various smaller satellite herds scattered throughout the areas entirety, small game such as Duiker, impala, Kudu, Roan, warthog have also made a remarkable comeback, and with that our predator numbers have done exceptionally well. It is of cardinal importance that we continue to fight the illegal trade in wildlife products and the continued support of the international trophy hunting market and our loyal clients and organizations such as SCI and DSC will ensure the resources for us to do so.

The 1 lion, 2 leopard, Crocodile, buffalo and plains game that we receive on quota and the funds generated from these species is integral to the continued survival of wildlife habitat, we need to encourage USFWS to seriously consider an amendment to the lion import policy as it will either aid in the demise or the survival of our natural resources.

My best always,

Jaco Strauss, PH/Outfitter

To whom it may concern,

I feel compelled to write this statement about my many trips to Africa. There is great beauty as well as unimaginable poverty and destruction. While traversing the continent you see the many villages, the wildlife and the ever changing landscape. Over the years some of the familiar areas have been desolated by human incursion from the slash/burn farming, clear cut timbering with ALL trees going to China and strip mining for coal. Some areas are "protected" with the local or national parks label but there is little supervision and the constant human encroachment and poaching result in an ever dwindling wildlife populations. On every trip to Africa with the exception of this one, there were always snares, traps and other cruel methods to poach the game. In the field I did not see or find a single example of poaching but at the lodge there was a nice collection of homemade muzzleloaders/firearms that had been confiscated or surrendered. One of the main reasons for such success are the anti-poaching units employed by Chawalo safaris. During my stay I met 2 of the traveling/patrolling anti-poaching units.

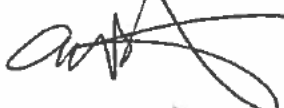
What makes the Chawalo Safaris area so special is the care, effort and expense they have put into making it the most pristine wildlife area that I have ever encountered. There is still a rather sizable human presence but through extensive interactions, education, acts of kindness and monetary rewards the local people have made great strides in preserving the wildlife especially with their efforts to stop all poaching. The funds that are generated through hunting have allowed Chawalo to establish a sound, renewable resource that brings much needed funds to an otherwise poor area.

A side note for consideration, we encountered a couple of young male lions, 2-4 years of age, traveling together. Before I even had a chance, Jaco Strauss (P.H.) said they were too young and he would not allow me to take one. If the cat wasn't at least 7 years old we would not be shooting it. That strong conviction to only harvest mature animals was a refreshing and pride inducing moment. The lion that was eventually harvested was at least 7 years old and a loner. He was mature but it was quite obvious that he was declining in health and stature. The perfect animal to harvest.

Another area where hunting funds have allowed Chawalo to assist in and establish harmony amongst the locals is the creation of Chissavo Clinic. A small medical clinic that treats the locals (and some not so local) residents. After an on-site visit, walk-through and interactions with the patients I was so impressed that I have made the decision to return and donate my services.

When making your determination for importation please consider my personal statement. Chawalo Safaris is not your average or typical outfitter. They have vastly improved the area not just for the wildlife but the locals as well. If all outfitters were half as conscientious and committed we would have a better world.

Thank you for your time,



Anastasios Pantelidis, M.D.

APR 13 2018

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(b) (6) 69-390/515 (b) (6)

Date 4/4/18

Pay to the order of U.S. Fish and Wildlife Service \$ 100.00

One hundred ^{00/100cents} 00 Dollars  Security Features Detailed On Back

WILLIAMSTOWN BANK
435 HIGHLAND AVE
WILLIAMSTOWN, WV 26187

Memo wildlife permit application 3-200-20 

(b) (6)



RCUD MAY 11 2018

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Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
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 <i>Kampeter</i>	1.b. First Name <i>Andrew</i>	1.c. Middle Name/Initial (b) (6)	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) (b) (6)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer: Last name	4.b. Principal officer: First Name	4.c. Principal officer: Middle name/Initial	4.d. Suffix
5. Principal officer: title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)				
1.b. City <i>Wardsville</i>	1.c. State <i>Missouri</i>	1.d. Zip code/Postal code (b) (6)	1.e. County/Province	1.f. Country <i>United States</i>
2.a. Mailing address (include if different than physical address, include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the nonrefundable application processing fee in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in <i>Title 50 Part 13 of the Code of Federal Regulations</i> and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) <i>[Signature]</i> <i>05/04/2018</i>
Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least 90 days for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
 - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
 - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
 - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

Same as page 1

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Andrew Kampeter

(b) (6)

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

NA

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera Leo Melanochaita, Southern African Lion

b. Sex (if known). *Male*

5. IF ANIMAL IS CURRENTLY LIVING IN THE WILD, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

*South Africa, Zululand, KwaZulu-Natal Province
Mkuze Fall Private Game Reserve, Nearest City = Pangola or Nonqoma*

b. Date wildlife is to be hunted:

July 18, 2018 thru Aug 4, 2018

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

Garry Kelly Safaris, Professional Hunter Sean Kelly

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

NA

b. Date wildlife was hunted:

NA

- c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

NA

- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

NA

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

NA Dont Have permits yet

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Rupert Dedekind
Business Name: Universal Trophy Service
Address: Plot 114
City: Bashewa
State/Province: Pretoria
Country, Postal Code: 0056

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

- a. Do you have any information regarding the population status or trend data on the species hunted?

Attached paper

- b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

Attached papers

- c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

Attached

9a) Do you have any information regarding the population status or trend data on the species hunted?

The current property forms part of the Wild Managed population of Lions in South Africa, as defined in terms of the Biodiversity Management Plan for Lion in South Africa. Furthermore, the property is contributing to the meta-population for the province of KwaZulu-Natal and subscribes to the principles for meta-population management as defined by the provincial conservation authority (Ezemvelo KwaZulu-Natal Wildlife). There are currently 18 lions on the property, of which three are available for offtake. Such offtakes will mimic natural population changes wherein old males are forced out of the pride structure. The property has had lions for the preceeding 10 years and have been managed to ensure the genetic integrity of the prides on the property.

There are 18 lions on the concession. 5 Males, the rest are females & cubs. We have been advised that there are too many Lions on the concession & have been allocated 3 to take off.

b) In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community or government?

Hunting permit and licences fees are paid to the provincial conservation authority, Ezemvelo KwaZulu-Natal Wildlife, with such funds being utilised to manage sustainable resource use in the province. The funds assist in the processing of hunting permits wherein the sustainability of each application is assessed and approved when appropriate.

The funds are used in various ways, but mainly for paying scouts for anti poaching initiatives, the re establishment of the species, security, upliftment of the area including fencing & roads.

The permit costs are R1000 & the concession fee is \$35 000

c) Do you have information on other funding activities that are being carried out, or were carried out by the safari outfitter, professional hunter, concession holder or land owner that provide a conservation benefit to the species being hunted/species hunted?

The concession is owned by the local community and the funds generated through hunting activities assists in the upliftment of the community through job creation and food provision.

The safari outfitter funds the landowners through the concession fees paid by clients. These funds are used for the protection of game (the \$35,000). Should there be no fees, there will be no protection of the game initiatives (scouts).

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature:  Date: 05/04/2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from the list of designated ports. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

(b) (6)

88-1474/815

(b) (6)

PAY TO THE ORDER OF US Fish and Wildlife Service \$ 100.00

One hundred 00/100

Heat Sensitive Ink

DOLLARS



MID AMERICA BANK

WACO, TEXAS 76798-1000

MEMO

[Signature]

MP

(b) (6)

LOOK FOR FRAUD DETERRING FEATURES INCLUDING THE SECURITY SQUARE #10 HEAT SENSITIVE INK. DETAILS ON BACK.



Department of Interior
U.S. Fish and Wildlife Service

RCVD JUN 08 2018

LB

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

**IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of
the Convention on International Trade in Endangered
Species (CITES) and/or U.S. Endangered Species Act (ESA)**

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1 a. Last Name Kirsch	1 b. First Name Patrick	1 c. Middle Name/Initial (b) (6)	1 d. Suffix
2. Date of Birth (mm/dd/yyyy) (b) (6)	3. Telephone Number	3 a. Alternate Telephone Number	4. E-mail address

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1 a. Name of business, agency, Tribe, or institution		1 b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4 a. Principal officer Last name	4 b. Principal officer First Name	4 c. Principal officer Middle name/initial	4 d. Suffix
5. Principal officer title		6. Primary contact name	
7 a. Business telephone number	7 b. Alternate telephone number	7 c. Business fax number	7 d. Business e-mail address

Section C: All applicants complete address information

1 a. Physical address (Street address; Apartment #, Suite # or Room #: no P.O. Boxes) (b) (6)				
1 b. City Waconia	1 c. State MN	1 d. Zip code/Postal code (b) (6)	1 e. County/Province	1 f. Country USA
2 a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2 b. City	2 c. State	2 d. Zip code/Postal code	2 e. County/Province	2 f. Country

Section D: All applicants MUST complete

1. Attach the nonrefundable application processing fee in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions (50 CFR 13.11(d)).
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in <i>Title 50 Part 13 of the Code of Federal Regulations</i> and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) Patrick Kirsch (b) (6) 05/21/2018
Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

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Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
 - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
 - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
 - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

Same as Page 1

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Patrick Kirsch

(b) (6)

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Lion , [REDACTED]

b. Sex (if known). Male

5. IF ANIMAL IS CURRENTLY LIVING IN THE WILD, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

Tanzania , East Africa. Hunting Block: M'barangandu Wildlife Management Area

b. Date wildlife is to be hunted:

August 28, 2018 thru September 17, 2018

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

Game Frontiers of Tanzania
Plot 23, Kasanga Street
Dar es Salaam, Tanzania

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

Not hunted yet

b. Date wildlife was hunted:

Not hunted yet

- c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Not hunted yet

- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

Not hunted yet

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). Have not hunted yet
8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:

Business Name: Game Frontiers of Tanzania

Address: Plot 23, Kasanga Street

City:

State/Province: Dar es Salaam, Tanzania

Country, Postal Code:

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

- a. Do you have any information regarding the population status or trend data on the species hunted?

The professional hunter through whom I am hunting has hunted this area every year for the past 8 years and reports seeing a number of male lions above the age of 6 years. He credits this to the thoughtful and successful game management practices introduced in 2012. The benefits of which we see today.

- b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

It is my understanding the govt. is paid \$30,000.00 each year by Game Frontiers for access to the hunting block with an additional \$30,000 paid each year to local game department who manages and controls the hunting. In addition, the hunting company employs workers from the village (cont

- c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

The hunting company each and every year improves the hunting area by grading roads, select and careful burning, construction of watering points, maintenance and expansion of springs, anti-poaching patrols and radio communication with government personnel and by conducting game surveys. It is essential to the (continued

Patrick Kirsch
Form 3-200-20
5-21-2018

Questions - Answers continued

Question 9B. Continued

and makes significant purchases of goods and services. The benefit to the local economy is substantial. Lastly, the hunting company gives the community much needed protein in the form of meat from trophies shot and paid for by the client.

Question 9C. Continued

Success of the hunting business that sound ^{game} management practices are followed at all times.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

NA → Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature: Patrick (b)(6) Kirsch Date: 5/21/2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from the list of designated ports. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

(b) (6)

5/21/18 DATE

(b) (6)

Pay to the
Order of

U.S. Fish and Wildlife Service

\$ 100.⁰⁰/xx

Dollars

One hundred dollars only



WebBank
Member
FDIC

Form 3-200-20 Application Fee

Actual & Virtual

(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 Lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: _____

 (b) (6)

Name: _____

GARY (b) (6) SHORES

Date: _____

May 3, 2018



Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

RCVD JUN 14 2018

LB

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES 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 Shores	1 b. First Name Gary	1 c. Middle Name/Initial (b)	1 d. Suffix
2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3 a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1 a. Name of business, agency, Tribe, or institution		1 b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4 a. Principal officer Last name	4 b. Principal officer First Name	4 c. Principal officer Middle name/initial	4 d. Suffix
5. Principal officer title		6. Primary contact name	
7 a. Business telephone number	7 b. Alternate telephone number	7 c. Business fax number	7 d. Business e-mail address

Section C: All applicants complete address information

1 a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1 b. City Wichita Falls	1 c. State Texas	1 d. Zip code/Postal code (b) (6)	1 e. County/Province	1 f. Country USA
2 a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2 b. City	2 c. State	2 d. Zip code/Postal code	2 e. County/Province	2 f. Country

Section D: All applicants MUST complete

1. Attach the nonrefundable application processing fee in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50 Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 05/03/2018
(b) (6)
Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least 90 days for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
 - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
 - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
 - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

- a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera leo Melanochaita Lion

- b. Sex (if known). Male

5. IF ANIMAL IS CURRENTLY LIVING IN THE WILD, please enter the following information:

- a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

Zimbabwe, Dande North Hunting Area

- b. Date wildlife is to be hunted:

09/13/2018 - 09/3/2018

- c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

Charlton McCallum Safaris - Keith Wall, ph

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

- b. Date wildlife was hunted:

- c. Name of hunting outfitter, safari company, or professional hunter you hunted with:
- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).
8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:

Business Name:

Address:

City:

State/Province:

Country, Postal Code:

Please see attached -

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

- a. Do you have any information regarding the population status or trend data on the species hunted?

*Please see info previously
provided by ZPWMA +
Conservation Force*

- b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

Same

- c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

Same

Gary Shores

From: CMS <admin1@cmsafaris.com>
Sent: Friday, May 04, 2018 7:25 AM
To: (b) (6)
Cc: Keith Wall
Subject: Re: September Lion Hunt

Hi Gary,

Thank you for your emails. You may use the following for your permit

~~Name: Gary Shores~~
Company name: Opping Investments t/a Charlton McCallum Safaris
Address: 14 Yellow Wood Lane
Kambanji
Harare
Zimbabwe
Postal code: 0000

For # 8

Let me know if there will be anything else you may require, happy to help.

Have a lovely weekend

Kirsty

From: CM Safaris
Sent: Friday, May 4, 2018 10:12 AM
To: CMS
Subject: Fw: September Lion Hunt

From: Gary Shores (b) (6)
Sent: Thursday, May 3, 2018 4:33 PM
To: CM Safaris
Subject: September Lion Hunt

Dear Sir,

If we are successful in getting a lion during our September hunt with you at Dande I will need the name of the person or business shipping the trophy to me. The Federal Fish and Wildlife Permit Application asks for the following information:

Name:
Business Name:
Address:
City:
State/Province:
Country, Postal Code:

The trophy/trophies will be shipped to The Wildlife Gallery, Inc.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

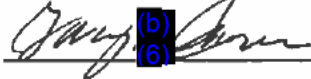
10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature:  Date: 05/03/2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from [the list of designated ports](#). If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

DAPU End of year Newsletter 2017

Charlton McCallum Safaris

10 January 2018



DAPU
DANDE ANTI POACHING UNIT

visit us at www.dapuzim.com

Dear Friends,

Thank you all so much for your unwavering support. DAPU has continued to build and evolve consistently throughout 2017. Total recorded snare yields, elephant poaching and illegal netting for the year 2017 are the lowest since the inception of DAPU. To be precise, since 2014 snaring has been reduced by 70% and poached elephants by 66%. We have recorded poached elephants since 2010, and whilst our 2010 and 2011 numbers are not perfectly accurate Elephant poaching has been reduced by 92% or from a high of 40 lost in 2010 and a low of 3 lost in 2017.

We are now in the wet season, and rainfall has been scarce and late. Unfortunately that means unless we get good late rains, then 2018 could be a busy year for DAPU simply because local villagers could be very hungry indeed.

We have continued to meticulously document all of our support, deployments, wins and losses and here we share a summary with everyone who so graciously and generously supported all of our efforts both financially and in kind. As we grow from strength to strength we look forward to your continued support.

With Regards,

Myles E. McCallum
James D. Charlton
Charles Nondo

Harare, Zimbabwe
10th January 2018

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1. Changes

As mentioned in previous reports, we have added Peter Solomon and Owen Zwiwanza to the management side of DAPU. Both go on patrols regularly in order to keep everyone honest.

CMS did a fair number of hunts in the Charara Safari Area in 2017 and we hope that we will continue with this into the future. Charara is a truly beautiful area with great promise and we have committed to a long-term plan for the area.

We had the one disciplinary issue in second period, and none other of any significance. Buzz and I feel that it is overdue for a one week re-training exercise for all DAPU scouts and supervisors and we hope to have this done by April 2018.

3. Peter Stewart fine art

Well 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.

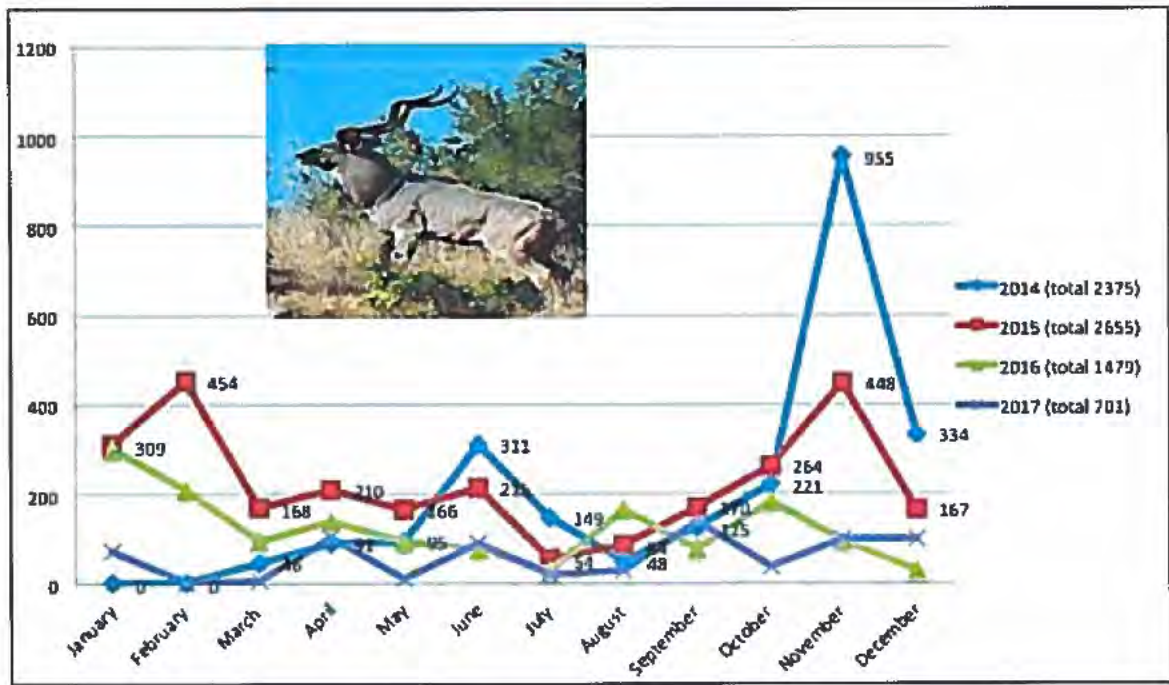
Month	No. of snares	Dogs shot	Meat Poachers convicted	Elephant poachers	Weapons retrieved	Rewards paid
January	71	0	3	0	2	US\$784
February	0	0	1	0	0	US\$150
March	7	0	0	0	0	US\$19
April	103	0	0	0	0	US\$133
	181	0	4	0	2	US\$1,086.00
May	9	0	0	0	0	US\$9
June	89	0	2	0	0	US\$118
July	19	1	2	0	0	US\$439
August	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

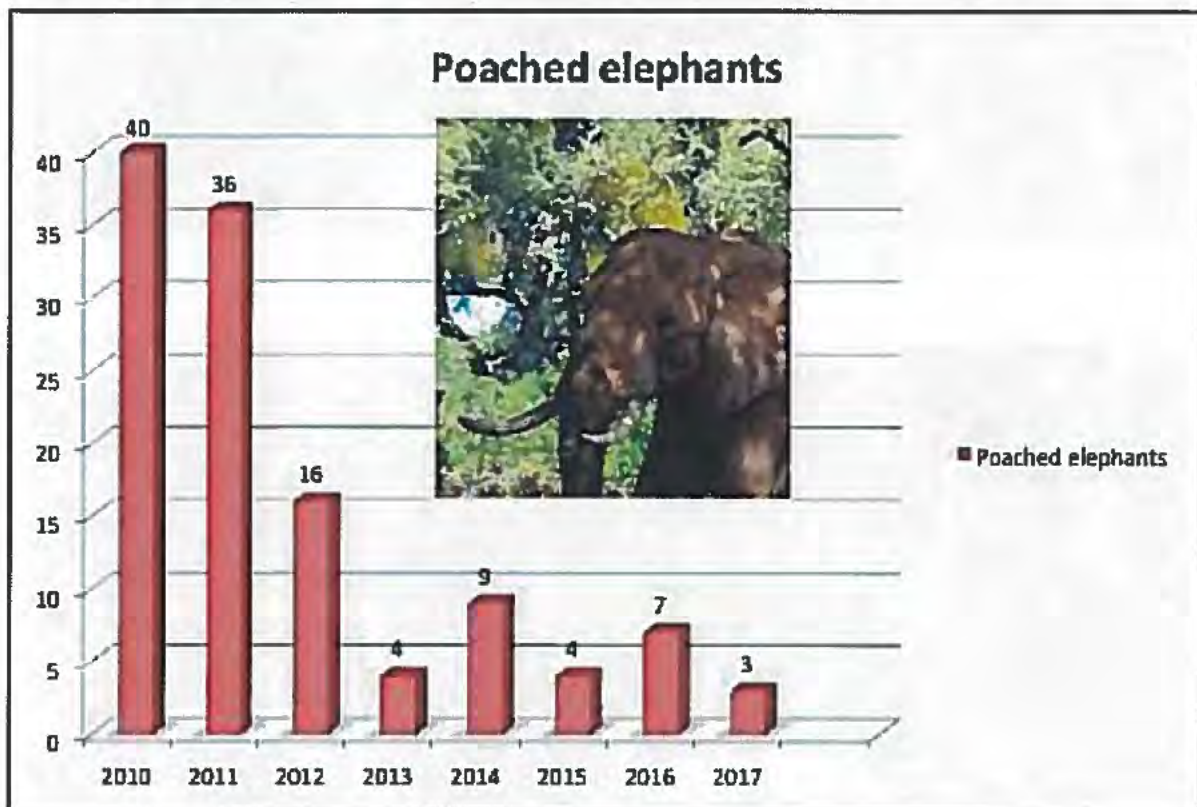


5. Elephant poaching

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.

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Fish traps – Zambezi River 2017

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Aimguard shotguns x 6 per kind favor of a young Harare based hunter



*** 3200m of piping and solar pump installation Dande East, October 2018***

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Conservation Force

Mail to:
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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

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3. Pieter Gertenbach and Charl Grobelaar – farmers in the Harare area that are always helping out with mealie meal, fertilizers, soap and other ration items. We use this to supplement the DAPU rations and it is always very well received by the DAPU teams!
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Income

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David Adams	US\$5,000
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Jytte Merjtsensen	US\$2,750
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Mike Core	US\$1,000
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Myron Repka	US\$2,880
Sylvanus Charitable Trust	US\$6,000
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<hr/>	
2017 Hunting clients levies and contributions.	US\$13,116
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Charlton McCallum Safaris	US\$45,540
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Total income	US\$113,616

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Total	US\$18,263

Total expenses		US\$113,616
Total income	US\$113,616	
Shortfall / Credit		US\$0

DAPU End of year Newsletter 2017

Charlton McCallum Safaris

10 January 2018



DAPU
DANDE ANTI POACHING UNIT

visit us at www.dapuzim.com

Dear Friends,

Thank you all so much for your unwavering support. DAPU has continued to build and evolve consistently throughout 2017. Total recorded snare yields, elephant poaching and illegal netting for the year 2017 are the lowest since the inception of DAPU. To be precise, since 2014 snaring has been reduced by 70% and poached elephants by 66%. We have recorded poached elephants since 2010, and whilst our 2010 and 2011 numbers are not perfectly accurate Elephant poaching has been reduced by 92% or from a high of 40 lost in 2010 and a low of 3 lost in 2017.

We are now in the wet season, and rainfall has been scarce and late. Unfortunately that means unless we get good late rains, then 2018 could be a busy year for DAPU simply because local villagers could be very hungry indeed.

We have continued to meticulously document all of our support, deployments, wins and losses and here we share a summary with everyone who so graciously and generously supported all of our efforts both financially and in kind. As we grow from strength to strength we look forward to your continued support.

With Regards,

Myles E. McCallum
James D. Charlton
Charles Nondo

Harare, Zimbabwe
10th January 2018

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1. Changes

As mentioned in previous reports, we have added Peter Solomon and Owen Zwiwanza to the management side of DAPU. Both go on patrols regularly in order to keep everyone honest.

CMS did a fair number of hunts in the Charara Safari Area in 2017 and we hope that we will continue with this into the future. Charara is a truly beautiful area with great promise and we have committed to a long-term plan for the area.

We had the one disciplinary issue in second period, and none other of any significance. Buzz and I feel that it is overdue for a one week re-training exercise for all DAPU scouts and supervisors and we hope to have this done by April 2018.

3. Peter Stewart fine art

Well known artist Peter Stewart has created the "DAPU collection"

<http://www.cmsafaris.com/dapu/DAPU-COLLECTION-2017.pdf>.

Peter has undertaken (very graciously) to donate 40% of the proceeds of any of the works in the collection to DAPU. In addition to that, two outstanding oils of Peters were auctioned in 2017 generating over \$4,000 for DAPU. So a HUGE thank you to Peter and our two highest bidders!



*** Auction # 1 ***



*** Auction # 2 ***

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.

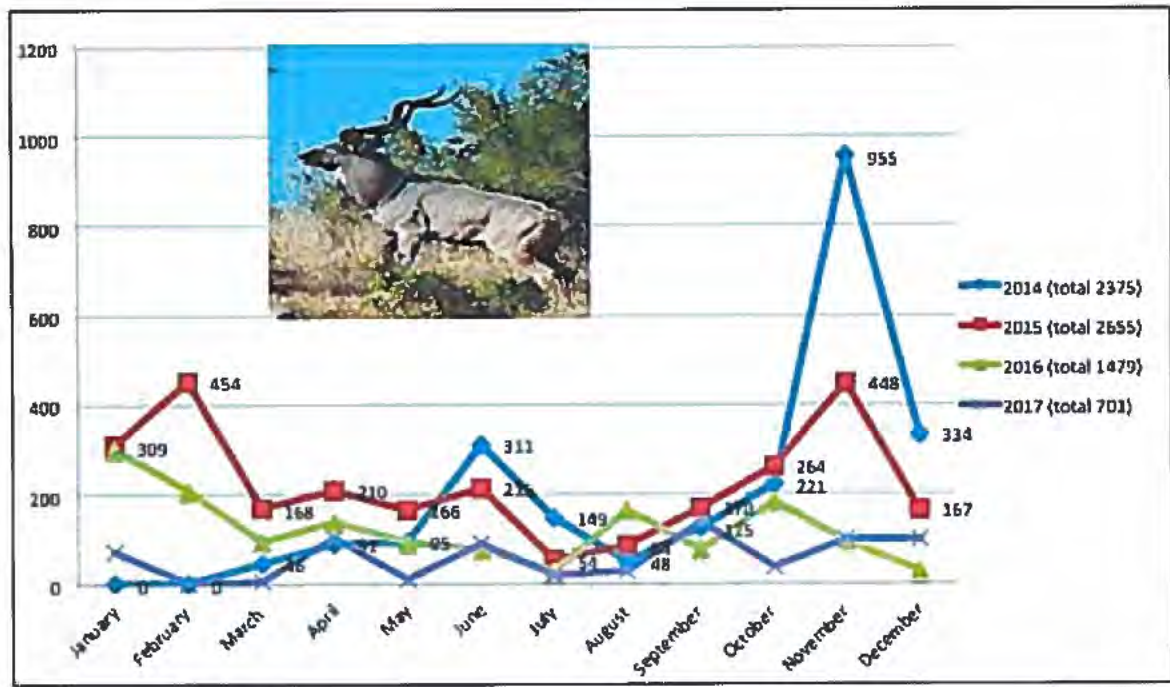
Month	No. of snares	Dogs shot	Meat Poachers convicted	Elephant poachers	Weapons retrieved	Rewards paid
January	71	0	3	0	2	US\$784
February	0	0	1	0	0	US\$150
March	7	0	0	0	0	US\$19
April	103	0	0	0	0	US\$133
	181	0	4	0	2	US\$1,086.00
May	9	0	0	0	0	US\$9
June	89	0	2	0	0	US\$118
July	19	1	2	0	0	US\$439
August	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\$4,689

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

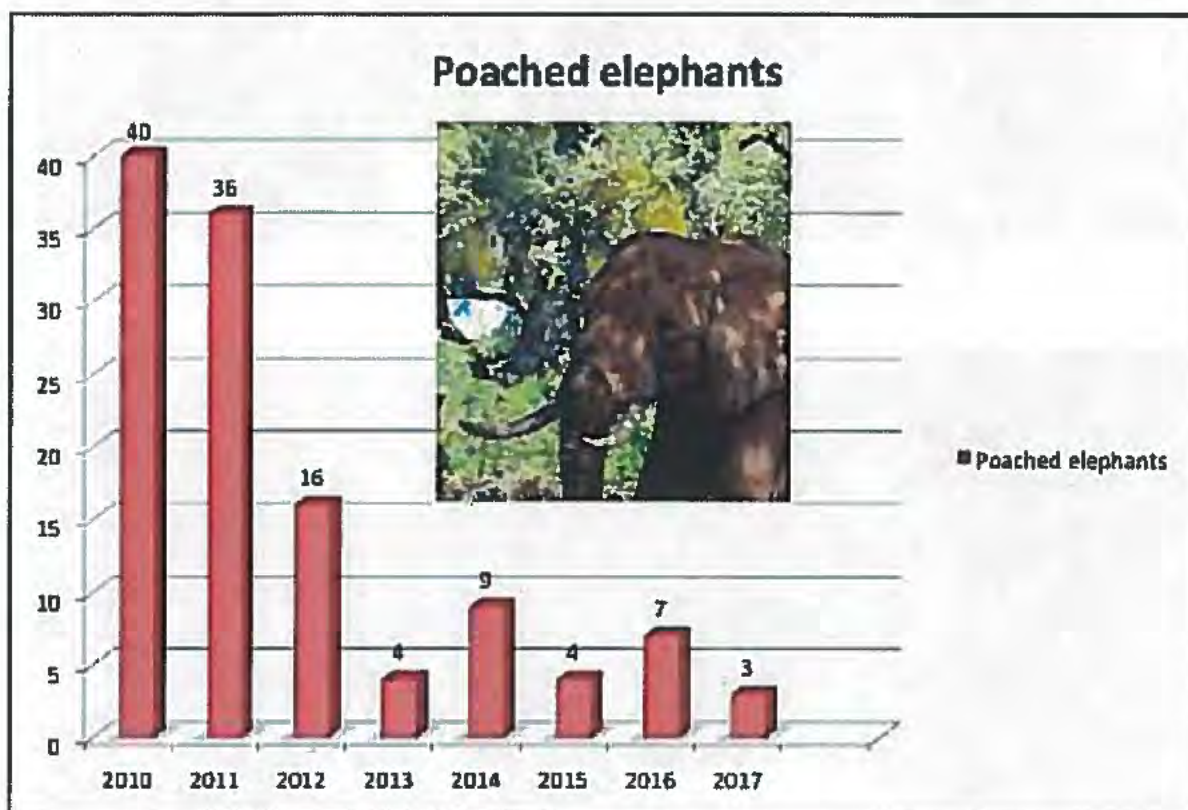


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(b) (6)

88-714/1119

May 3, 2018

\$ 100.00

DOLLARS



PAY TO *U.S. Fish and Wildlife Service*

THE ORDER OF

One Hundred & 00/100

American National Bank & Trust™

Scott Avenue Branch
825 Scott Ave • (940) 723-0172
Wichita Falls, Texas, 76301



MEMORANDUM

[Signature]

MP

(b) (6)

OPTIONAL FORM NO. 10

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted African Lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: _____



Name: _____

Lonnie Kitt

Date: _____

4/16/2018



Department of the Interior
U.S. Fish and Wildlife Service

OMB Control No. 1018-0093
Expires Rev 08/31/2020

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:

**IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)**

RCUD JUN 14 2018

LA

Complete Sections 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 Kitt	1.b. First name Lonnie	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (dba)	
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information					
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address) (b) (6)					
1.b. City Schuyler	1.c. State Nebraska	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province	1.f. Country U.S.A.	
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)					
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country	

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50 , and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.	
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) 	Date of signature (mm/dd/yyyy) 05/08/2018

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:

- (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 - Phone: (504) 837-1233 Email: cf@conservationforce.org
3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No ☒ Yes ☐

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

- a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera, Panthera leo, African Lion

- b. Sex (if known). **Male**

5. IF ANIMAL IS CURRENTLY LIVING IN THE WILD, please enter the following information:

- a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

Zambia, Luangwa Valley, Nyaminga GMA near Mfuwe Town

- b. Date wildlife is to be hunted: **06/01/2018- 06/21/2018**

- b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

Paya Kakuli Safaris - Leon Kachelhoffer, Professional Hunter

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

- b. Date wildlife was hunted:

- b. Name of hunting outfitter, safari company, or professional hunter you hunted with:

- c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). **HAVE NOT HUNTED YET. DO NOT HOLD PERMITS YET.**

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: *MIKE BORNMAN*
Business Name: *BANGWEULU TAXIDERMY, LTD.*
Address: *4142/K CHIFWEMA ROAD*
City: *NEW KASAMA, LUSAKA*
State/Province:
Country, Postal Code: *ZAMBIA 10101*

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

- a. Do you have any information regarding the population status or trend data on the species hunted?
- b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?
- c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)


10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies and two elephant trophies within the same calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  _____ Date: 05/08/2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

All international shipment(s) must be imported through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).



P.O.Box 32502 Lusaka 10101 Zambia Phone 0026 0955 453630/0026 0977 776010
Email: brodahood6010@hotmail.com or trophytrackersconsult@gmail.com

ENHANCEMENT REPORT

Company & Concession Description

Paya Kakuli Safaris Ltd has been operating in Nyaminga Game Management Area since 2014 .The concession is 840 square kilometers and provides habitat for a range of species including Baboon Buffalo Bushbuck Bushpig Crocodile Duiker Eland Grysbok Hippo Hartebeest Hyaena Impala Kudu Leopard Lion Oribi Puku Roan Antelope Warthog Waterbuck Cooksons Wildebeest Zebra. We have a lease with the Dept of National Parks & Wildlife Services of Zambia for seven years, renewable.

The Directors are Zambian born and our Company is family owned and has been operating for seven years.We employ a Resident Professional Hunter and two other Professional Hunters & Camp Staff of 24 including Game Trackers ,Skinners, Chefs Waiters & Cleaners. Our operations support in excess of 200 dependents in the local villages. Our Lease is a comprehensive concession plan which includes anti poaching and community support.

Anti Poaching Component

Paya Kakuli Safaris employs 28 Village Scouts for Anti Poaching and spends \$10,000 annually on Law Enforcement, of which \$2500 is spent quarterly.Our teams work closely with the National Parks & Wildlife Services conducting comprehensive anti poaching patrols. We also supply both food rations and fuel for the patrols and provide uniforms boots & caps. The company has also donated Shotguns ammunition and HF Radios to assist in the anti poaching.Paya kakuli safaris supplied and erected a Transmitter/Repeater Antenna with Radios for communication ease, being vital for our Anti Poaching Patrols, which has led to numerous arrests and confiscations of snares meat and weapons.

Paya Kakuli Safaris has also undertaken the rehabilitation of the Scout Camps. Our Area is heavily patrolled and sweeps are carried out by vehicle and on foot. We also undertake all maintenance of the vehicle for Dept of National Parks & Wildlife. We have erected an office for the Community Resources Board for Meetings and additionally donated bicycles to help them in their endeavours for patrolling and to sensitize and

educate the community. Our contract is such that the monies generated from the Safari Hunting is split 60/40 with dept of national Parks and the Local Community. In the years 2016/2017 we generated \$320,000 in Area Fees & Trophy Fees.

Community Participation

Paya Kakuli Safaris are committed to support the local community and to this end 50% of the meat derived from our safaris is donated and delivered to them. In addition we have put in 4 Boreholes and Medical Clinic, House for Teaching Staff and a Dormitory for Girls and the School. We have also donated a Motor Vehicle for Community Based Projects and Anti Poaching.

Habitat Protection & Conservation Development

Our anti poaching efforts have allowed the Game Population to improve over the three years we have had the concession. We have deepened 7 of the animal watering holes and have filled these with water from the newly dug boreholes when there is a shortage of water. In our efforts to survey Lion in our Area we record sightings, spoor and as much data as is known on any individual. Because we are keeping these records we ensure that our limited offtake is sustainable. We also follow the age based policy of not harvesting Lions below the age of 6 years.

The Majority of our Lion and Elephant Hunters are from the United States and these hunters follow conservation ethics that see them contributing above their fees to the community and towards anti poaching in the Hunting Area.

The revenue from Lion and Elephant Hunting are our highest value hunts and generate approximately 50% of our overall revenue and Lion alone approx 35%.

In summation, Paya Kakuli Safaris sustainable hunting program not only enhances the sustainability of the survival of the Lion and all Wildlife in our Area but it also serves to protect the habitat. Revenue generated by the Safari Company demonstrates the value of the Wildlife to the local community and provides an incentive to ensure this natural resource is around for generations to come.

ATTACHMENTS

Map of Game Management Area

Supportive Letters/acknowledgements from village/district leaders Chief Kazembe

Anti poaching reports

Letters of Donation Receipt for :

Motor Vehicle

Shotguns & Ammunition

HF Radios

Community Based Projects for Local Community.

Photographs of :

Poachers and Illegal Timber Cutters Apprehended

Transmitter/Repeater Installations

Meat Distribution to Villagers

Supply Rations to Scouts/Anti Poaching Patrols

Meat Distribution

to Villagers

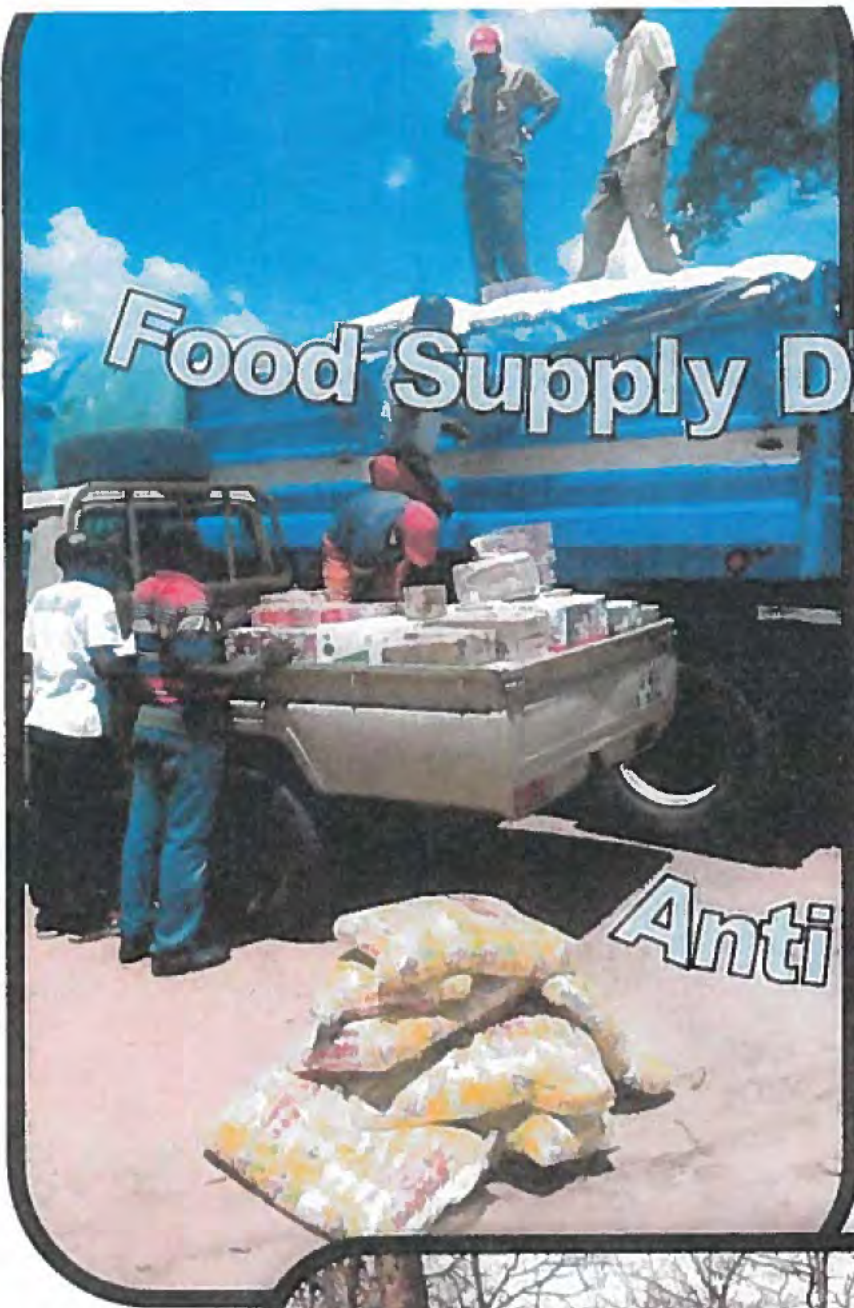




Poachers Caught

Illegal Timber Apprehended



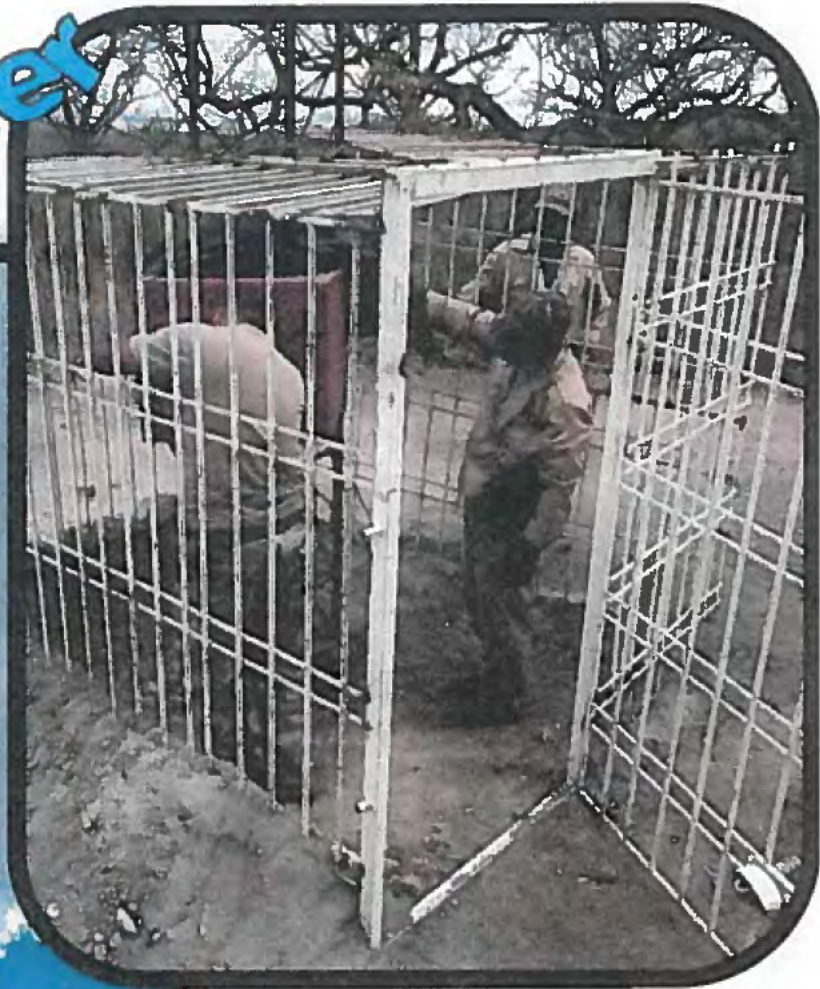


Food Supply Distribution

Anti Poaching



Radio Transmitter & Repeater



Communication Network
for Anti Poaching Patrols



MINISTRY OF TOURISM & ARTS

Department of National Parks and Wildlife

Private Bag 1, Kafue Road, Chilanga, Zambia
Telephone: +260-211-279080 / 278366 / 278555 / 278365
Telefax: +260-211-278524 / 278244 / 278471
Email: info@zawa.org.zm



All correspondence should be addressed to the Director

12th April, 2017

The Director
Paya Kakuli Safaris
LUSAKA

REF: HANDING OVER OF COMMUNITY VEHICLE REGISTRATION NUMBER ABD 561

The captioned subject matter refers.

We are delighted to inform you that after a comprehensive assessment of the Land Cruiser hard top bearing registration number ABD 561 by our Workshop Foreman in presence of His Royal Highness Chief Kazembe, the Wildlife Ranger based in Lundazi and CRB Chairperson, we are hereby beseeching the release of the captioned vehicle to Kazembe Community Resources Board as per agreement embedded in the documented minutes dated 13th February, 2017.

Further, we are also pleased to learn that your company will be rendering free intensive vehicle service once a year for the entire period of the Hunting Concession Agreement amidst the routine auto service requirements that will be financed by the CRB. This gesture will enhance supplementary efforts in maintaining road worthiness of the vehicle while prolonging its life span.

In view of the foregoing, it is a firm anticipation of the Department that all parties involved will abide by the terms of reference vividly stipulated in both the consent letter and minutes. By and large, the Department is therefore not sceptical that the aforementioned vehicle will assist in enhancing the tenets of Community Based Natural Resources Management and resource protection in Lumimba GMA.

Yours faithfully


 **Paul Zyambo**
DIRECTOR

Southern Region Office
P.O. Box 60086
Livingstone
Tel: +260-213-321396

Eastern Region Office
P.O. Box 18
Mfuwe
Tel: 062 45021 / 062 45042

Northern Region Office
P.O. Box 710393
Mansa
Tel: +260-212-8221735

Western Region Office
P.O. Box 830124
Mumbwa
Tel: 01 800056



MINISTRY OF TOURISM & ARTS

Department of National Parks and Wildlife

Private Bag 1, Kaluse Road, Chilanga, Zambia
Telephone: +260 211-279080, 278400, 278350, 278300
Telefax: +260 211-278624, 278244, 278471
Email: info@znpw.org.zm



All correspondence should be addressed to the Director

7th June, 2017

The Director
Paya Kakuli Sataris Limited
P.O. Box 32502
Bwinjumulumu Road
LUSAKA

Dear Sir,

REF: DONATION OF TWO HIGH FREQUENCY (HF) RADIOS

Reference is hereby made to your letter dated 17th May, 2017, in which you pledged to donate two (2) High Frequency Radios under Law Enforcement Pledge for the fiscal year 2017 to Zokwe Camp for communication purposes.

The Department wishes to thank you for this timely gesture that will significantly contribute to the emergency and security communication needs of Zokwe Camp and its surrounding areas. Most importantly, this trend is firmly anticipated to enhance resource protection in the respective Game Management Area.

Lastly, the Department would like to express its sincere gratitude for the conservation partnership your company has continued exhibiting especially in the areas of resource protection and socio-economic development.

Yours faithfully,

Austin Mwakifwamba

**ACTING DIRECTOR - DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
for/PERMANENT SECRETARY - MINISTRY OF TOURISM AND ARTS**

Tel: +260 211 223930
Fax: +260 211 223930
Telex: ZA 45510
Email: psmta@mta.gov.zm



REPUBLIC OF ZAMBIA
MINISTRY OF TOURISM AND ARTS
OFFICE OF THE PERMANENT SECRETARY

In reply please quote

No.

KWACHA HOUSE
CAIRO ROAD
P.O. Box 30575
10101 LUSAKA

MTA/NPW/4/9/1sec

18th December, 2017

The Director
Paya Kakuli Safaris Limited
Plot No. 284 Bwinji Mfumu Road
P.O. Box 32502
LUSAKA

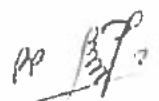
**RE: DONATION OF SIX SHOT GUNS TO THE DEPARTMENT OF NATIONAL
PARKS AND WILDLIFE FOR OPERATIONS IN NYAMINGA HUNTING
BLOCK**

The above captioned subject matter refers.

The Ministry of Tourism and Arts wishes to acknowledge receipt of your letter dated 11th December, 2017 in which you donated Six (6) Shot guns to the Department of National Parks and Wildlife for operations in Nyaminga Hunting Block (your concession area) for the year 2018.

The Ministry is grateful of your donation and wishes other safari hunting outfitters would emulate your gesture. We would like to assure you that the fire arms will be put to good use.

Looking forward to continue working with you.


Liya Nawa Mutale (Dr.)
Permanent Secretary

MINISTRY OF TOURISM AND ARTS



Paya Kakuli Safaris Limited

Address : Plot 284 Bwinjimfumu Road , P.O Box 32502, Lusaka.
Email : brodahood6010@hotmail.com
Tel : +260-977-776010.

THE DIRECTOR GENERAL

National Parks and Wildlife

Headquarters, Chilanga

Lusaka Province

Zambia.

06/10/2016.

DEAR SIR,

RE: DONATION OF 6 SHOTGUNS & 50 AMMUNITIONS

Kindly receive a donation of 6 shot guns and 50 ammunitions as promised by Paya-kakuli safaris for Nyaminda hunting Block.

YOURS FAITHFULLY,

Faizel Lulat – DIRECTOR

Received by .

Shimfane Mubanga

17

17/10/2016

KALIMBA Community Resource Board

On 25 April 2016, The board had a meeting at Mt. Wildlife Camp to budget on the KBT 5000 allocation for 2016 Pledge money. The board resolved and agreed to the following:

1. 1 Teacher's house at Mt. Kimba - amounting K7,880
2. Chubumba Community School amounting K5,120
3. Zekwe - 1 Teacher's house amounting K7,150
4. Completion of class room at Kigumba Day School
K100 for 50 sets of cement.

Three quotations were collected from three different suppliers namely:

1. Christopher Zimba Hardware - K12,825
2. Ntoko Trading - K13,555
3. Gwaka Enterprise K13,055

The board had chosen Christopher Zimba who had the lowest prices.

Mona Kinn
[Signature]

KAZEMBE COMMUNITY RESOURCE BOARD (CRB)
P.O Box 530007
Lundazi

24.03.2018

TO WHOM IT MAY CONCERN

KAZEMBE COMMUNITY RESOURCE BOARD 2017 RECOMMENDATION REPORT

We the people living within the confines of Kazembe Chiefdom, in order to manage effectively commercial business of Wildlife and other resources, established a Community Resource Board by the powers entrusted in us, under the Zambia Wildlife Act Number 12 of 1998.

An agreement was made and entered on 16th day of March 2015 between the Zambia Wildlife Authority by then but now Department of National Parks and Wildlife (DNPW), the outfitter Paya Kakuli and the Kazembe Community, under the Zambia Wildlife Act Number 12 of 1998.

The Parties agree and acknowledged that the agreement shall be governed by and construed in accordance with the Laws of the Republic of Zambia.

Objectives

- To protect Wildlife and other Natural resources and to prevent all forms of illegal use of natural resources.
- To provide an environment conducive to a positive relationship with Safari Hunting companies (and their Client).
- To increase the population of wildlife in the area.

Benefits from:

• Concession

In 2017, 107,000 USD was received from animals fees and was divided into three categories such as 20% which went to CRB Administration from it, 1x6 CRB Office Block was erected at Kazembe Headquarters, 14 Bicycles for CRB members were bought to patrol and sensitize community members on conservation and other office equipment were procured. 35% it was spent on community development e.g Infrastructure developments such as (Clearing of hunting Roads, 1x10 compartments Girls dormitory was constructed at Kazembe Secondary

School, 3 Teachers houses were Constructed and 1 house at Zokwe for a Nurse was constructed.

45% was spent on 28 Village Scouts salaries who are CRRB employees. Field Patrol Rations was bought for 4 Camps used to combat poaching in the area. Patrol gear such as Camping Tents and Uniforms were bought. The Company supported four (4) CRRB quarterly meetings on planning and budgeting.

50% of all edible meat was distributed to all VAGs and to DNPW according to the concession agreement.

\$7000 USD was paid by Safari Company to the Government as a concession fee where 50% goes to the Government and 50 % is played back to the community.

10000 USD was spent on Law Enforcement independently, of which every quota of the year 2,500 USD is spent on field Patrol food packs for four (4) wildlife camps within the Hunting block.

2120 USD is spent by the company on yearly evaluation meeting by Department of National Parks and Wildlife and other stake holders to know the performance of the Company to which 2017 performance of Company was tremendously good.

• Obligation

Six (6) Firearms and 50 x 12 bore ammunitions were provided to combat poaching in the Game Management Area within the hunting block.

• Pledge

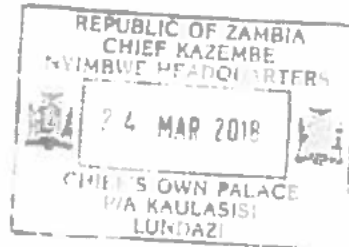
One Motor Vehicle for the Community was purchased (1 and 1 cruiser) and annually servicing is done by the Safari operator. Maintenance of DNPW Motor Vehicle is as well done by the operator. Four (4) Bore holes in the Community were drilled. Two (2) HF Radios for communication in the area were provided by the Safari Company and (1) Tower was erected for signal.

Financial support and logistics for on the spot anti-poaching activities is provided such as fuel deploying officers in the field, transport costs by taking suspects to and from Court, informer incentives and some other Court logistics.

Therefore, according to the support letter, the company and the employees of the company are not eligible for the National Parks and Wildlife, and the company is not eligible for the company to bring more clients to know our company and its products, services and more.

Handwritten signature

Chief Kazembe
Chief Kazembe



Handwritten signature

Joseph Bwalya
Chief Bwalya
Minister of National Parks and Wildlife

Handwritten signature

Wanda Mvula
Wanda Mvula
Kazembe Community Resource Board



His Royal Highness Chief Kazembe
Chief's own Palace
Nyimbwe Palace
P/A Kaulasis
Lundazi

18th February 2016,

THE DIRECTOR GENERAL,
NATIONAL PARKS AND WILDLIFE (ZAWA),
PRIVATE CHIANGA,
LUSAKA.

Dear Sir,

SAFARI OPERATOR'S COMMITMENT TO KAZEMBE COMMUNITY

Kindly refer to the above captioned subject matter. So far, I have had no problems, dealing with the safari operator, director for safari hunting company **paya – kakuli**. Mr **Faizel Lulat** has had a very good working relationship with me the patron for Kazembe Community Resource Board (CRB) in Nyaminga Hunting Block and the community at large. He has always wanted to consult (ZAWA) and me the now **National Parks and Wildlife** when it comes to the issues to do with Kazembe Community Development, he wants transparency in his dealings. The Community Resource Board for Nyaminga Hunting Block, National Parks and Wildlife should work together in consultation so that there is proper transparency in all transactions. He will always want the consent and the knowledge of the Patron and National Parks and wildlife (ZAWA) before he does anything, as he already made funds available for his obligations to the community to avoid any confusions.

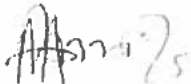
Your assistance and understanding on this matter will highly be appreciated.

Yours Faithfully,

The Patron,

Kazembe Community Resource Board.

Chief Kazembe



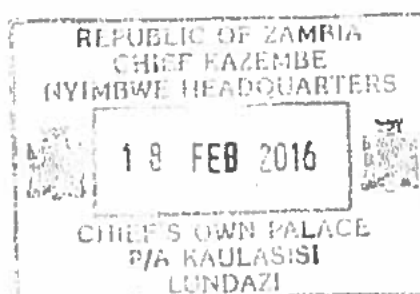
BANDA VINCENT

Cc. Area Warden - Chipata

Cc. Director – Finance

Cc. The Officer – CBNRM

Cc. Park Ranger - Lundazi



I Tennyson Mominco Senior legal officer
Under Department of National Parks and
Wildlife acknowledge receipt of K21,200 for
Evaluation Exercise of the Hunting
Concession Agreement for Pangsakukhi

AG/SLO
~~mya~~ 01/11/17

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No _____ Yes _____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

- a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
- b. Sex (if known).

5. IF ANIMAL IS CURRENTLY LIVING IN THE WILD, please enter the following information:

- a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:
ZAMBIA
LUANGWA VALLEY . NYAMINGA CMA NEAR MFUWE TOWN
- b. Date wildlife is to be hunted: JUNE 1ST TO 21ST, 2018
- b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
PAYA KAKULI SAFARIS PROFESSIONAL HUNTER,
LEON KACHEKHOFER

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:
- b. Date wildlife was hunted:
- b. Name of hunting outfitter, safari company, or professional hunter you hunted with:
- c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

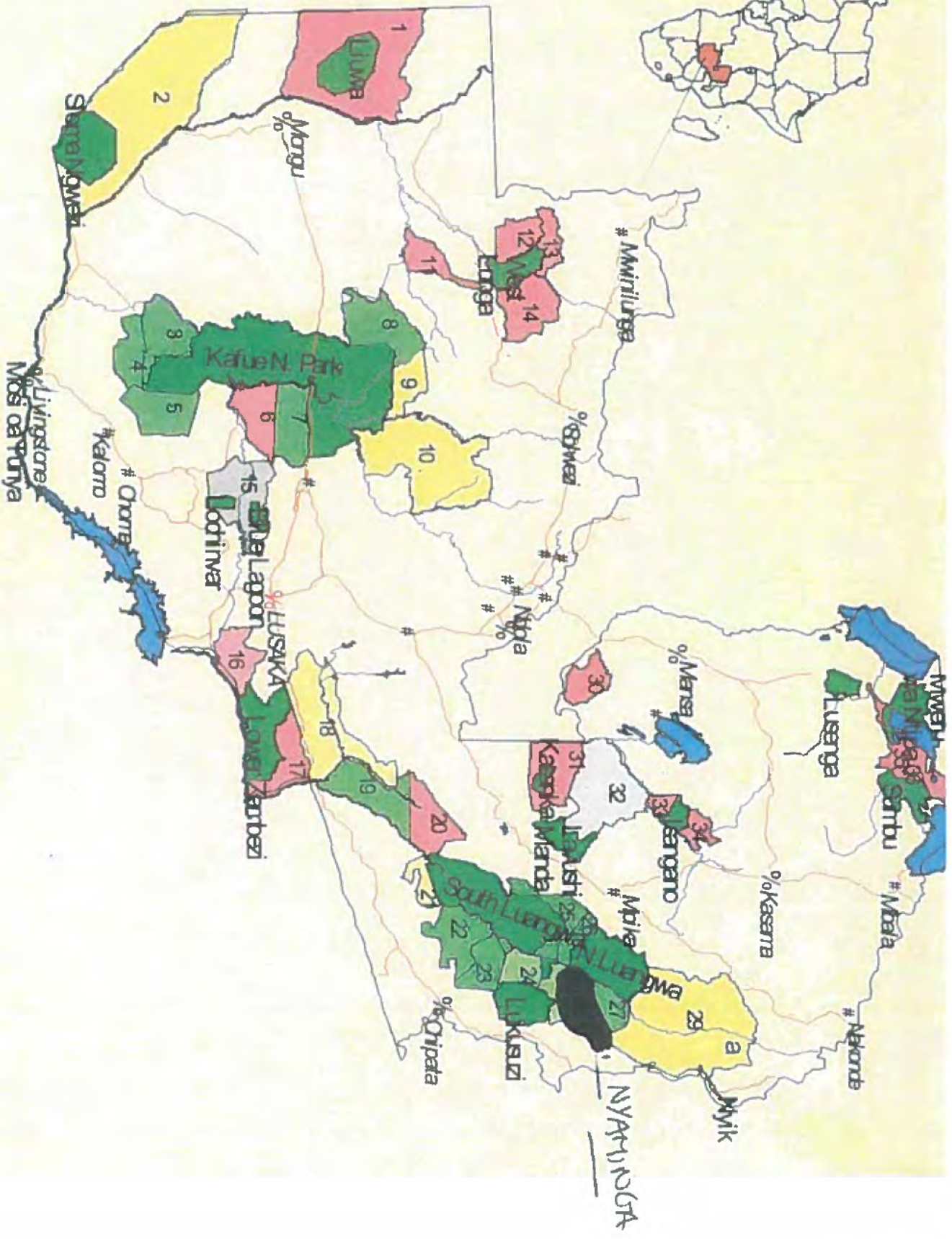
Name: MR. MIKE BORNMAN
Business Name: BANGWEULU TAXIDERMY LTD.
Address: 4142/K CHIFWEMA ROAD
City: NEW KASAMA, LUSAKA
State/Province:
Country, Postal Code: ZAMBIA 10101

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

- a. Do you have any information regarding the population status or trend data on the species hunted?

- b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

- c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?



500

0

500 Kilometers

Check Gallery | 800.877.4204 | www.checkgallery.com

78-165-1040



(b) (6)

(b) (6)

DATE 5/8/2018

PAY TO THE ORDER OF

USFWS

one hundred dollar + no/100

\$ 100.00

DOLLARS



Check to Cash



BANK FIRST

COLUMBUS - NORFOLK - WAYNE - ORD - O'NEILL
(402) 371-8005

FOR Cities Application

(b) (6)

(b) (6)

OTHA

MP

PRINTED ON RECYCLED PAPER USING VEGEBLIT BASED INKS



Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

RCVD FEB 12 2018

RCVD FEB 12 2018

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name McGovern	1.b. First name JASON	1.c. Middle name or initial (b) (6)	1.d. Suffix (b) (6)
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/Doing business as (see instructions) (b) (6)
6.a. Telephone number (b) (6)	6.b. Alternate telephone number (b) (6)	6.c. Fax number (b) (6)	6.d. E-mail address (b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (dba)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information					
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)					
1.b. City Tifton	1.c. State GA	1.d. Zip code/Postal code (b) (6)	1.e. County/Province (b) (6)	1.f. Country USA	
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) (b) (6)					
2.b. City Tifton	2.c. State GA	2.d. Zip code/Postal code (b) (6)	2.e. County/Province (b) (6)	2.f. Country USA	

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. [Signature] Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)
	01/28/2018 Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
Panthera leo, Lion
Panthera leo, Lioness
 - b. Sex (if known).
1 - male
1 - Female
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
 - b. Date wildlife is to be hunted:
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
South Africa, Reitdale Game Reserve, Reitdale Farm 239,
Leriesdeel, Northwest, TSCA
 - b. Date wildlife was hunted:
7/28/2016

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

Lion → Life size mount, skin, skull
Lioness → Life size mount, skin, skull

- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

Republic of South Africa

Moredou Taxidermy, PO Box 323, Schweizer Renzke 2780

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:

Business Name: Logwin Air and Ocean SA (PTY) LTD

Address: 1619 SPARTAN

Address: Johann Birkhner Road

City: KEMPTON PARK

State/Province: GAUTENG

Country, Postal Code: South Africa

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  Date: 01-28-18

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).
9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):
10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.
- ☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.
11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Jason McGovern, (b) (6)
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.

US Fish & Wildlife Service

5)

To answer the question on how hunting will enhance or benefit the wild populations of the species. It's been documented that well regulated and monitored hunting is beneficial to the species and not related to population decline. The species is not in trouble because of sport hunting but threatened by habitat loss, loss of prey, and retribution killings during human-wildlife conflicts. If it wasn't for hunting and the money to support the reserves then the habitat would not exist for the species. It also makes the species have value so all the locals do not kill off the species and hunt them to extinction.

Thank you.

Jason McGovern Application

(b) (6)

64-175/612

(b) (6)

DATE 1-28-18

PAY TO US Fish & Wildlife
THE ORDER OF

\$ 100.00

one hundred + 00/100

DOLLARS

☐ Security Features
Check for Signs

Ameris
Bank

MEMO

[Signature]

MP

(b) (6)



MAILED APR 26 2018

LB

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: 1A
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

**IMPORT OF SPORT-HUNTED
TROPHIES**
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link: .

Section A: Complete if applying as an individual

1 a. Last Name <i>McAllister</i>	1 b. First Name <i>Mark</i>	1 c. Middle Name (b) (6)	1 d. Suffix
2. Date of Birth (mm/dd/yyyy) (b) (6)	3. Telephone Number	3 a. Alternate Telephone Number	4. E-mail address (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		5. Primary contact name	
7 a. Business telephone number	7 b. Alternate telephone number	7 c. Business fax number	7 d. Business e-mail address

Section C: All applicants complete address information

1 a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)				
1 b. City <i>Medford</i>	1 c. State <i>OREGON</i>	1 d. Zip code/Postal code (b) (6)	1 e. Country/Province	1 f. Country <i>USA</i>
2 a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2 b. City	2 c. State	2 d. Zip code/Postal code	2 e. Country/Province	2 f. Country

Section D: All applicants MUST complete

1	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount identified on page 2, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. [50 CFR 13.11(d)]
2	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50 Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
Signature of applicant Principal Officer for permit (No photocopied or stamped signatures) <i>Mark McAllister</i> (b) (6) Date of signature (mm/dd/yyyy) <i>03-20-18</i>	
Please continue to next page	

E. IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
 - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
 - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
 - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

Mark McAlister
(b) (6)
Medford, Oregon (b) (6)

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Mark McAlister
(b) (6)

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No

Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera leo melanochaita

b. Sex (if known).

5. IF ANIMAL IS CURRENTLY LIVING IN THE WILD, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

South Africa, Free State Province, Vrededorst Isile Town.

b. Date wildlife is to be hunted:

August 2018

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

Brave Heart Safaris

PH Joe Viljoen

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

b. Date wildlife was hunted:

- c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Brancher & Schantz
PH Joe Vitoen

- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

Hasn't hunted yet but permit is attached.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Joe Regal
Business Name: Joe Regal Taxidermy
Address: Farm Thelma
City: Odendaalsrus
State/Province: 9480
Country, Postal Code: Free state, South Africa

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

- a. Do you have any information regarding the population status or trend data on the species hunted?

no

- b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

\$27,000^{us} no other data

- c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

no

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature: md mick Date: 3-20-18

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from the list of designated ports. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).



U.S. FISH AND WILDLIFE SERVICE
DECLARATION FOR IMPORTATION
OR EXPORTATION OF
FISH OR WILDLIFE

1. Date of Import/Export: (mm/dd/yyyy)
2. Import/Export License Number:
3. Indicate One: <input checked="" type="checkbox"/> Import <input type="checkbox"/> Export
4. Port of Clearance: <u>Portland, ME</u>
5. Purpose Code: _____
6. Customs Document Number (s)

7. Name of Carrier:
8. Air Waybill or Bill of Lading Number: Master _____ House: _____
9. Transportation Code: _____ License # _____ State or Province _____
10. Bonded Location for Inspection:
11. Number of Cartons Containing Wildlife:
12. Markings on Cartons Containing Wildlife:

13a. (Indicate One) (Complete name/U.S. address/telephone number/e-mail address)
☒ U.S. Importer Mark (b) McAllister
☐ U.S. Exporter

(b) (6)

13b. Identifier Number: _____ ID Type: _____

14a. (Indicate One) (Complete name/foreign address/telephone number/e-mail address)
☒ Foreign Importer
☐ Foreign Exporter

14b. Country Code: _____

Joe Regal Taxidermy
Farm Thelma 4480
Odendaalsrus
Free state, South Africa

14c. Identifier Number: _____ ID Type: _____

15a. Customs Broker, Shipping Agent or Freight Forwarder:
(Complete business name/address/telephone and fax number/e-mail address)

15b. Identifier Number: _____ ID Type: _____

15c. Contact Name: _____

Species Code (Official Use Only)	16a. Scientific Name	17a. Foreign CITES Permit Number	18a. Description Code	19a. Quantity/Unit	20. Country of Species Origin Code (ISO Code)	21. Venomous Live Wildlife Indicator <input type="checkbox"/> (Check if yes)
	16b. Common Name	17b. U.S. CITES Permit Number	18b. Source Code	19b. Total Monetary Value		
	<u>Panthera Leo melanochaita</u> <u>African Lion</u>					<input type="checkbox"/>
						<input type="checkbox"/>
						<input type="checkbox"/>
						<input type="checkbox"/>

Knowingly making a false statement in a Declaration for Importation or Exportation of Fish or Wildlife may subject the declarant to the penalty provided by 18 U.S.C. 1001 and 16 U.S.C. 3372(d)

For Official Use Only
Action/Comments:

(b) (6), (b) (7)(C)

22. I certify under penalty of perjury that the information furnished is true and correct.

Mark _____ Date _____
Signature
Mark _____
Type or Print Name

OFFICIAL PERMIT

1 ZASTRON STREET
 AGRICULTURAL BUILDING
 THIRD FLOOR
 BLOEMFONTEIN, 9300
 FREE STATE
 SOUTH AFRICA

PERMIT OFFICE
 PRIVATE BAG X20801
 BLOEMFONTEIN, 9300

TEL: +27 (0) 51 400 9527/26
 FAX: +27 (0) 51 400 9523



destea

department of
 economic, small business developm
 tourism and environmental affairs
 FREE STATE PROVINCE

PERMIT HOLDER DETAILS

NUMBER	(b) (6)	
NAME	Mark (b) (6) MC Alister	
PHYSICAL ADDRESS	(b) (6)	Box 169 Vredefort 9595
	USA	

THIS PERMIT IS ISSUED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT (10 OF 2004) (THREATENED OR PROTECTED SPECIES REGULATIONS) AND IN TERMS OF THE FREE STATE NATURE CONSERVATION ORDINANCE (8 OF 1965).
 AUTHORISATION IS HEREBY GRANTED TO THE HOLDER OF THIS PERMIT TO,

Hunt following species on the farm Doornpoort, Vredefort.

Species Name	Scientific Name	Total
Lions 900032002299158	Panthera leo	1
PERMIT HOLDER'S SIGNATURE	APPROVED BY THE MEC DEPARTMENT OF ECONOMIC, SMALL BUSINESS DEVELOPMENT, TOURISM AND ENVIRONMENTAL AFFAIRS	
EXPIRY DATE 30 July 2018 RETURN PERMIT AFTER EXPIRY	PERMIT NUMBER NC.8025/2018	DATE ISSUED 2018/04/13

Department of Economic & Small Business
 Development Tourism & Environmental Affairs

13 APR 2018

Private bag X 20801
 Bloemfontein 9300
 Free State Province



(b) (6)

4-24-18

Date

(b) (6)

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Order of

U.S. Fish & Wildlife Service

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[Signature]

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RCUD MAR 30 2018

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted Lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: _____

Name: _____

Date: _____



Eubulu

(b) (6)

Kenn

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19 MARCH 2018.



Department of the Interior
U.S. Fish and Wildlife Service

OMB Control No. 1018-0093
Expires Rev. 08/31/2020

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:

IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

NOV 30 2018

LB

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name KERZ	1.b. First name Eubulus	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy)	3. Telephone number (b) (6)	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		5. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

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 Shreveport	1.c. State LA	1.d. Zip code/Postal code (b) (6)	1.e. County/Province	1.f. Country USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.	
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) 	Date of signature (mm/dd/yyyy) MARCH 19th 2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (*Appendix I of CITES and/or ESA*)

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least 90 days for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- (1) Is raw, processed, or manufactured;
- (2) Was legally obtained by the hunter through hunting for his or her personal use;
- (3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- (4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
 - (i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
 - (ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
 - (iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

-
1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.
 2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?
myself - (b) (6)
 3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No ☒ Yes ☐

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

PANTHERA LEO, AFRICAN LION

b. Sex (if known). MALE.

5. IF ANIMAL IS CURRENTLY LIVING IN THE WILD, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

MATETSI Unit 1, MATABELAND NORTH,
VICTORIA FALLS, ZIMBABWE

b. Date wildlife is to be hunted: MAY 1 - 21ST, 2018

b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

MARTIN PIETERS

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

b. Date wildlife was hunted: _____

b. Name of hunting outfitter, safari company, or professional hunter you hunted with:

c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

NOT hunted yet.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Trophy Consultants International
Business Name:
Address: 4 JOSEPH CHINAMANO ROAD
City: BELMONT
State/Province:
Country, Postal Code: Bulawayo, 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 ENCLOSED +
INFO SUBMITTED BY CONSERVATION
FORCE + ZPMA

- b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

- c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that my client may only import two leopard trophies and two elephant trophies within the same calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: _____

Date: MARCH 19th, 2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

All international shipment(s) must be imported through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

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Big game hunting in Zimbabwe.....making a difference to communities

Hunting in Zimbabwe

When you think of Africa, what comes to your mind.....lush plains, flowing rivers, animal migrations.....big cats, safari lodges and kitted game drive vehicles, visions conjured up by numerous wildlife documentaries, dvd's showing exclusive photographic safaris with discerning clientele being pampered by attentive staff.....yes the scenes shown to us make us believe that all is well in Africa. Thats all very well, but realistically, Africa is not all about the above, there are many, many areas that have limited land use options, this is based on rainfall, wildlife numbers, accessibility and terrain. Most of these 'forgotten areas' are not good enough for the photographic companies, no one wants to invest in the unknown, return on investment would be negative....., so what happens.....

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Enter the safari operator, professional hunter and dedicated wildlife enthusiast.....the client. Countless millions of dollars are poured into these areas annually throughout Africa by true conservationists, people who care about the preservation of our species for future generations. One such area (and there are many) is the Omay, Nyaminyami RDC, operated by Martin Pieters Safaris, www.martinpieterssafaris.com

For many years we have poured hunters dollars into this remote area, educating communities, conducting anti poaching actives, reintroduction and relocation of wildlife , construction of clinics and schools..... 9 years down the road, what do we have.....an area renowned for big game, a community that is happy and a generation that focuses on wildlife conservation and not poaching activities.



In 2014, African conservancies was born and plans for the Ume River Conservancy were laid on the table, further cementing the relationship between dedicated safari operators and the community, allowing them to be directly involved in wildlife based decisions. Plans are currently underway with approval from local government to create a large remote conservancy where sustainable off take of certain species will form the back bone of wildlife conservation. 2 years down the road, we are already seeing the results as populations of several species are increasing whilst poaching activities are decreasing.

There is a lot to be done, but by taking these positive steps, by involving the local residents, by making use of these ' remote and forgotten areas ', areas that are unsuitable for the typical pampered photo safari enthusiast.....we will continue to turn them into areas teeming with wildlife, an area to be proud of.....thank you to our hunters.

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Next time you are stuck in traffic, have a delayed flight or are shovelling snow off your porch.....close your eyes, dream of Africa, there is no better time to come hunting in Zimbabwe than today.

Our efforts today will be enjoyed by our children of tomorrow.

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Hunting Areas Zimbabwe

2014 Trophy Gallery

Safari Information

CONTACT INFO

Martin and Candy Pieters, P.O BOX 1684, Bulawayo, Zimbabwe
Phone: +263 9 67792
Mobile: +263 778 121 842
Email: Martin Pieters

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Sustainable off take benefiting communities

Sustainable off take

Since 2007 we have been involved in dedicated wildlife conservation through sustainable off take, quota control, anti poaching and community based wildlife education in the Omay campfire concession.

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The Omay (NyamiNyami RDC) is a vast (2 million acres) populated communal land which one of the first areas to be given the CAMPFIRE status, whereby local communities benefit from wildlife off take, it is not rocket science that this program works as we continue to see an increase in wildlife numbers in our area. Communities receive direct benefit both financially and through various projects implemented by Martin Pieters safaris such as clinics, schools, vehicles for anti poaching and the employment of scouts. It must be noted that the Nyaminyami RDC is a remote inhospitable concession that has no other land use model due to very erratic and low rainfalls, an abundance of mosquitos, tsetse flies and poor soils. The only benefit local people have, is to receive financial remuneration from hunting safari off take and employment.



We at Martin Pieters safaris, www.martinpieterssafaris.com employ locals in all our camps as well as a dedicated anti poaching team that works alongside the RDC (council), national parks, the police and the MAPP (Matusadonna anti poaching project), we continue to collect snares, arrest poachers and follow up on convictions and more importantly, educate people on the long term sustainable use of our national heritage. This method has been proven and several past poachers have turned tables and are now our most trusted wildlife officers, using their past notorious skills to help us protect our wildlife.

Every year several local villagers are killed or maimed by elephant, lion, buffalo, hippo and crocodile, they live in close proximity to these animals and only tolerate them because we as a hunting

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company give back to the community. It is very important for the protection of our wildlife in these remote areas that we continue to assist the RDC with anti poaching, continue to pay for the sustainable off take of a select quota, because if we do not, the locals will kill every animal, they will not tolerate wildlife disruptions to their families, be it through the destruction of their crops on an annual basis, or the loss of one of their family members.

Our wildlife populations are on the rise, we border the Matusadonna national park, there are no fences to stop animals movements, we are very much needed, even more so now with current rainfall patterns at their lowest, poaching will increase as people find it difficult to grow crops, we will not let the last 10 years of effort to protect our wildlife be a waste, we will not leave these villagers high and dry with no form of income or food.

We thank our hunters for their continued support. It is because of you that our conservation methods are successful.



We spend in excess of \$ 40 000 / annum on anti poaching

We have collected over 15 000 wire snares since 2007 saving thousands of animals.

We assist in arrests of subsistence poachers and heavily armed



elephant poachers, we follow up with convictions so that these men and women can be put away and our animals will be safe.

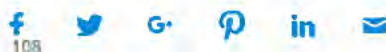
We monitor game movements and patterns and adjust our quotas accordingly so that we continually have an increase for future generations

We have assisted in the construction of clinics, schools and information centers.

We employ over 30 locals in our camps and in the field thus as siting hundreds of locus through indirect benefits.

Last but not else, we pay over \$ 200 000 in direct benefits annually to the RDC and the local wards for wildlife off take.

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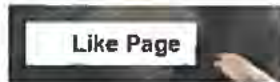
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Mobile: +263 778 121 842
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References

Nyaminyami and
Martin Pieters
Safaris

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AFRICAN CONSERVANCIES ANTI-POACHING 2015

AFRICAN CONSERVANCIES

African Conservancies was established in 2014, it's first project was in Nyaminyami Rural District Council in the Omay Communal Land hunting area. A.C comprises Carbon Green International, the relevant Rural District Council and the relevant community in which the conservation plan falls. A trust has been formed that will include these parties as beneficiaries. The primary goal of A.C was to locate a suitable area to form, build and manage a sustainable community conservation area. The Omay 1 hunting area between the Ume and Sengwa Rivers was selected as a perfect phase one. The criteria of selection includes; being communal land hunting area, fall within the C.G.I REDD+ project area.

OBJECTIVES OF AFRICAN CONSERVANCIES

The primary objective of A.C was to select an area within the REDD+

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project, (stretching from Binga to Kanyemba in the communal areas) and partner the community and council. The belief in building sustainable conservation areas and in particular enabling communities to truly and directly benefit from this sustainable utilization is at the core of this project.

The immediate goals with the Ume River Community Conservation Area were to reduce hunting offtake and reduce poaching. The hunting offtake was reduced in 2014 and in 2015. For example, 2014 saw twelve buffalo being hunted from the quota of thirty five. 2015 we will have a buffalo offtake of ten from the possible thirty five. Having done our own numbers on the ground, our offtakes are very conservative and the population increase through relocation due no pressure is clearly visible with far better trophy quality.

Anti poaching began in 2014, the six C.G.I scouts based out of Manyuli camp close to the Gokwe boundary and six scouts based out the Ume hunting camp. We decided at the close of 2014 that the anti poaching was not having enough effect on the structured elephant poaching, so in March 2015 Steve Wentzel and I decided that it needed direction and management. So beginning March, I personally came into the Omay to oversee and manage the anti poaching teams.

I immediately amalgamated the two teams and brought in Mr. Charles Khumalo to head up this new team. Charles is ex Zimbabwean National Army, a brave, dedicated leader who has commanded not only the respect of this unit, but myself and the community at large.

We started in house training incorporating weapons training, tactical house clearances, offensive tracking and building a more intense unit that could cope with a far more aggressive natured outlook to the poaching problems. This immediately began to produce results.

Our focus has been on hardened armed poachers with the theory that the snare and dog meat poachers would be dealt with in the process of eliminating the more "serious" elements.

AREA OF OPERATIONS

Though we in theory are based in the Omay communal land, our operations stretch into Gokwe, around Chizarira and Charisa and Binga. due to our operations being outside of the National Parks we predominantly operate with Police details and R.D.C scouts. Our entire unit has now been accepted as Police reservists and are awaiting their Police force numbers. It has been agreed that our unit

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having been accepted as reservists, will establish a dedicated reaction team within the police force that I shall train and manage.

OPERATIONS

Beginning 2014 we funded the basing of James Mcallwain from MAPP out our hunting camp in Chipfudze on the Southern boundary of the Matusadona National Park. The reasoning for this was obviously to maintain the Parks presence on this boundary, which was non existent due to lack of capacity. Secondly, James was to establish an informant network that would offer up targets for our unit to react to. This was very effective and results were immediate.

With James leaving MAPP in August 2015, the MAPP trustees unfortunately decided to move their operations back into the Park. This led to a huge information breakdown and vacuum.

August 2015 Charles Khumalo was tasked in resurrecting and bettering the information networks as reacting to shots fired is almost a pointless affair. The poaching teams shoot toward last light, fifteen minutes from shots fired, the elephants face is chopped off and they are moving. There is no way to track them fast enough to catch them up at this stage. The needle in haystack affair is almost pointless for arresting poachers. There are over one hundred and fifty square kilometers of bush to patrol, it would require an army to do this. Our first goal was to bring into operations a full time intelligence operative whome we had been grooming for this position.

The informant/intelligence network has had significant effect, we have over one hundred and twenty people on our books. Over ninety percent of our arrests have occurred and been made possible through the capturing or paying for intel. We have put in place "watchers" who monitor targets and wait for opportunity to ensure arrests have hard tangible evidence for prosecution. "Mapani" whom he was second on our priority list and pulled the trigger on the three elephant days after the Sebungwe Action Plan Meeting; was monitored for four months prior to his arrest late October. Literally we actioned the arrest when his "watcher" informed us that he had begun drinking beer with tusks and firearms still being present. After four long months, he eventually made a mistake!

ARRESTS

Below are a list of arrests of hardened elephant poachers, I have omitted all of our lessor arrests of meat poachers.

February 7th 2015

^

Reaction to shots fired Matusadona southern boundary resulted in a joint op with Parks rangers with our tracker team. Poaching team ambushed and two armed poachers killed. One "John Raymond" being a casualty of this contact was fourth on our priority list. Firearm 303 recovered.

February 12th 2015

Sting operation on the Gokwe boundary resulted in the arrest of three "dealers" supplying arms and ammo to the poaching syndicates. One tusk, thirty rounds 303 and forty five 7.62 intermediate (AK 47) rounds recovered.

March 12th 2015

Contact and exchange of fire in Manyuli, no casualties but a 303 rifle recovered.

April 22nd 2015

Raid carried out on "Magura" syndicate whilst infiltrating. Arrests effected on entire team of four with recovery of 303 rifle.

April 23rd 2015

Intel from "Magura" arrests led to the arrest of "Mark Neberi" who was third on our priority list.

June 23rd 2015

"Jabu" syndicate shot and killed an elephant in the park on the late afternoon of the 22nd June. Sting operation produced 20kg tusks and an arrest. Further information led to the arrest of team members.

July 23rd 2015

Escapees from the February contact arrested and two 303 rifles recovered.

October 22nd 2015

"Mapani" second on our priority list finally cornered with seven tusks one 303 rifle and one 450 watts. His accomplice and partner "Malalanzi" could not be implicated in this arrest, remains monitored and in second place on our priority list. 375 rifle they were using has been "located" and is being monitored for uplift.

^

FUTURE OPERATIONS

Future operations will continue in the Omay communal land, the hard hitting unit has had a serious effect on poaching syndicates. The informant network has reduced the "safety" factor for the syndicates. We are able to reach right into their homes and they have no secure areas to operate in.

The community outreach via the chiefs seems to be having an effect. Chief Negande has issued an order that anyone assisting poaching syndicates will be banished from the Omay. The subsequent banishing of two of his subjects over the last month has sent a very strong message about how serious he has become!

The upsurge in armed Zambian incursions in the lower Zambezi has us concerned with intel coming in of Zambian teams planning to operate here. The Cyanide is our major concern. Having only picked up poisoned fruit in July with no further cyanide incidents we were fairly relaxed about it. Subsequent to the MAPP arrest of the "Kariba" cyanide team, one of their members who escaped prosecution has been into our area. I am currently running a campaign in the community educating them of this problem. It is finally dawning on people that these elephant poachers will poison water sources that will not only kill elephant, but their livestock and families are at risk to.

As always, funding these operations and supplies of material are a constant battle. Carbon Green and Ume River Conservancy face the brunt of this funding with perpetual short falls. We rely on cell phones for communications, which is erratic at best! Firearms and ammunition have been supplied by me personally, again we are short if all members are in field. The idea of us tackling these teams with catapults and axes sounds ludicrous but is whats happening! So we are perpetually looking for help keeping the ball rolling.

Chris Moore

Ume River Conservancy

13th November 2015

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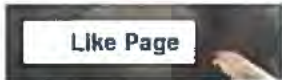


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NYAMINYAMI RURAL DISTRICT COUNCIL

The Communal Areas Management Programme for Indigenous Resources (CAMPFIRE)

The background of the Community Based Natural Resources Management approach in Zimbabwe

In Zimbabwe the Community Based Natural Resources Management is practiced under the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE). The programme started in 1988 and Nyaminyami Rural District Council and the then Mbire Rural District Council were the pioneers in starting to implement it. Nyaminyami has 12 wards and 11 of them partake in the CAMPFIRE programme. The concept is to ensure that the local communities are benefiting from the sustainable utilization of their natural resources. The major source of the revenue for the community under this programme is the sport hunting. The district has three hunting concessions namely Omay Area1 under Bulembi Safaris t/a Martin Pieters safari, Omay area 2 under Safrique safaris and Gache Gache Area 3 under Track-A-Hunt safaris. The funds derived from this source are channeled straight to the producer communities for community developmental projects. The district has got a department of wildlife which together with other stakeholders combats illegal exploitation of natural resources as realized as of economic and social importance. Below is revenue accrued from 2013 to 2014, projects implemented by respective wards and law enforcement efforts.

NYAMINYAMI RURAL DISTRICT COUNCIL

BULEMBI SAFARIS/ MARTIN PIETERS SAFARIS TROPHY FEES FOR TROPHY FEES JANUARY.....DECEMBER 2013

MOLA WARD 3

Species	Sex	Number killed	Unit Price \$	Total Price	45% dividend to the ward
Elephant	M	3	9100	27300.00	12285.00
Elephant	Tuskles	3	2100.00	6300.00	2835.00
Buffalo	M	16	2100.00	33600.00	15120.00
Buffalo	F	5	750.00	3750.00	1687.00
Leopard	M	6	2550.00	15300.00	6885.00
Zebra		8	800.00	6400.00	2880.00
Impala	M	11	160.00	1760.00	792.00
Crocodile		7	1750	12250.00	5512.50
Baboon		9	25.00	225.00	101.25
Warthog	M	1	250.00	250.00	112.00
Hippos		9	1800.00	16200.00	7290.00

Bushbuck	M	10	500.00	5000.00	2250.00
Kudu	M	3	800.00	2400.00	1080.00
Klipspringer	M	1	400.00	400.00	180.00
Duiker	M	1	100.00	100.00	45.00
Hyena		2	220.00	440.00	198.00
Lion	M	1	5000.00	5000.00	2250.00
Porcupine		1	30.00	30.00	13.50
Total				147045	66170.00

SAFRIQUE SAFARIS TROPHY FEES FOR TROPHY FEES JANUARYDECEMBER 2013

Species	Sex	Number killed	Unit Price \$	Total Price	45% dividend to the ward
Crocodile		1	1750.00	1750.00	787.50
Impala	M	1	160.00	160.00	72.00
Total				1910.00	859.50

BULEMBI SAFARIS TROPHY FEES FOR JANDEC 2013

MOLA WARD 4

SPECIES	SEX	NUMBER KILLED	UNIT PRICE US \$	TOTAL PRICE US\$	45% DIVIDEND TO THE WARD
Elephant T/less		5	2100.00	10500.00	4725.00
Buffalo	M	10	2100.00	21000.00	9450.00
Buffalo	F	1	750.00	750.00	337.50
Impala	M	20	160.00	3200.00	1440.00
Impala	F	6	90.00	540.00	243.00
Hippos		8	1800.00	14400.00	6480.00
Bushbuck	M	7	500.00	3500.00	1575.00
Waterbuck	M	11	1400.00	15400.00	6930.00
Leopard	M	1	2550.00	2550.00	1147.00
Zebra		3	800.00	2400.00	1080.00
Crocodile		4	1750.00	7000.00	3150.00
Kudu	M	2	800.00	1600.00	720.00
Klipspringer	M	1	400.00	400.00	180.00
Baboon		2	25.00	50.00	22.50
Warthog	M	1	250.00	250.00	112.50
Monkey		1	15.00	15.00	6.75
Sable	M	1	2200.00	2200.00	990.00
Ducks		1	5.00	5.00	2.25
Total				85760.00	38 592.00

SAFRIQUE SAFARIS/ Martin Pieters safaris TROPHY FEES FOR JANUARY TO DECEMBER 2013**MOLA WARD 4**

SPECIE	SEX	NUMBER KILLED	UNIT PRICE US\$	TOTAL PRICE US\$	45% TO WARD
HIPPOPOTMUS	M	4	1800	7200	3240
CROCODILE	M	2	1750	3500	1575
ZEBRA	M	1	800	800	360
IMPALA	M	3	160	480	216
TOTAL				11980.00	5391.00

**SAFRIQUE SAFARIS / Martin Pieters safaris TROPHY FEES FOR TROPHY FEES
JANUARY.....DECEMBER 2013****NEBIRI WARD 7**

SPECIE	SEX	NUMBER KILLED	UNIT PRICE US\$	TOTAL PRICE US\$	45% TO WARD
ELEPHANT	M	1	9100	9100	4095
ELEPHANT	TIUSKLESS	2	2100	4200	1890
BUFFALO	M	12	2100	25200	11340
BUFFALO	F	3	750	2250	1012
LEOPARD	M	2	2550	5100	2295
ZEBRA	M	2	800	1600	720
IMPALA	M	2	160	320	144
BABOON	M	7	25	175	78.75
HYEANA	M	2	220	440	198
KLIPSPRINGER	M	1	400	400	180
KUDU	M	1	800	800	360
TOTAL					22 313.25

BULEMBI SAFARIS / Martin Pieters safaris TROPHY FEES FOR JANUARY TO DECEMBER 2013**NEBIRI WARD 7**

SPECIE	SEX	NUMBER KILLED	UNIT PRICE US\$	TOTAL PRICE US\$	45% TO WARD
BUFFALO	M	2	2100	4200	1800
TOTAL					1800

SAFRIQUE SAFARIS/ Martin Pieters safaris TROPHY FEES FOR JANUARY TO DECEMBER 2013**MSAMPAKARUMA WARD 9**

SPECIE	SEX	NUMBER KILLED	UNIT PRICE US\$	TOTAL PRICE US\$	45% TO WARD
ELEPHANT	TUSKLESS	2	2100	4200	1890.00
BUFFALO	M	3	2100	6300	2845.00
LEOPARD	M	1	2550	2550	1147.00
KUDU	M	1	800	800	360.00
BUFFALO	F	1	750	750	337.00
BABOON	M	2	25	50	22.50
TOTAL					6592.50

BULEMBI SAFARIS

BUFFALO	M	1	2100	2100	945.00
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Mola ward 3 wildlife project dividends 2014 by Bulembi safaris/ Martin Pieters safaris

SPECIES	SEX	NO.KILLED	UNIT PRICE US\$	TOTAL PRICE US\$	45% DIVIDEND
Elephant	m	2	9 100.00	18 200.00	8 190.00
Elephant	t/l	3	2 100.00	6 300.00	2 835.00
Buffalo	m	10	2 100.00	21 100.00	9 450.00
Buffalo	f	1	750.00	750.00	337.50
Hippo		12	1 800.00	21 600.00	9 720.00
Waterbuck	m	2	1 400.00	2 800.00	1 260.00
Crocodile		9	1 750.00	15 750.00	7 087.50
Lion	m	1	5 000.00	5 000.00	2 250.00
Leopard	m	3	2 550.00	7 650.00	3 442.50
Spotted hyena		6	220.00	1 320.00	594.00
Impala	m	8	160.00	1 280.00	576.00
Impala	f	6	90.00	540.00	243.00
Bushbuck	m	6	500.00	3 000.00	1 350.00
Baboon		12	25.00	300.00	135.00
Civet cat		1	100.00	100.00	45.00
Warthog	m	1	250.00	250.00	112.50
Jackal		1	80.00	80.00	36.00
Klipspringer	m	1	400.00	400.00	180.00
TOTAL					48 874.00

Mola ward 4 Tayanda wildlife project dividends for 2014 by Bulembi safaris/ Martin Pieters safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US\$	TOTAL PRICE US\$	45% DIVIDEND
Elephant	M	1	9 100.00	9 100.00	4 095.00
Hippo		5	1 800.00	9 000.00	4 050.00
Impala	M	9	160.00	1 440.00	648.00

Impala	F	3	90.00	270.00	121.00
Kudu	M	1	800.00	800.00	360.00
Sable	M	2	2 200.00	4 400.00	1 980.00
Crocodile		1	1 750.00	1 750.00	787.50
Baboon		1	25.00	25.00	11.25
Bushbuck	M	1	500.00	500.00	225.00
Waterbuck	M	1	1 400.00	1 400.00	630.00
Leopard	M	1	2 550.00	2 550.00	1 147.50
Zebra		1	800.00	800.00	360.00
TOTAL				32.035.00	14 415.75

Nebiri ward 7 wildlife project dividends 2014 by Bulembi Safaris/ Martin Pieters safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US\$	TOTAL PRICE US\$	45% DIVIDEND
Buffalo	M	1	2 100.00	2 100.00	945.00
Leopard	M	3	2 550.00	7 650.00	3 442.50
Kudu	M	1	800.00	800.00	360.00
Hyena		1	220.00	220.00	99.00
Impala	M	1	160.00	160.00	72.00
Impala	F	1	90.00	90.00	40.50
Baboon		3	25.00	75.00	33.75
TOTAL				11 095.00	4 992.75

Kasvava ward 8 wildlife project dividends 2014 by Bulembi Safaris/ Martin Pieters safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US\$	TOTAL PRICE US\$	45% DIVIDEND
Buffalo	M	1	2 100.00	2 100.00	945.00
Leopard	M	1	2 550.00	2 550.00	1 147.50
Bushbuck	M	1	500.00	500.00	225.00
Elephant	t/l	2	2 100.00	4 200.00	1 890.00
Total				9 350.00	4 207.50

Msampakaruma ward 9 (Ndechedu) wildlife project dividends 2014 by Bulembi Safaris/ Martin Pieters safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US\$	TOTAL PRICE US\$	45% DIVIDEND
Buffalo	M	1	2 100.00	2 100.00	945.00
TOTAL				2 100.00	945.00

Mola ward 3 wildlife project dividends 2014 by Safrique safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US\$	TOTAL PRICE US\$	45% DIVIDEND
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Hippo	m	4	1 800.00	7 200.00	3 240.00
Lion	m	2	5 000.00	10 000.00	4 500.00
Bushbuck	m	2	500.00	1 000.00	450.00
Buffalo	m	1	2 100.00	2 100.00	945.00
Baboon	m	1	25.00	25.00	11.25
Duiker	m	1	100.00	100.00	45.00
Spotted hyena	m	1	220.00	220.00	99.00
Klipspringer	m	1	400.00	400.00	180.00
Waterbuck	m	1	1 400.00	1 400.00	630.00
TOTAL					10 100.25

Mola ward 4 Tayanda wildlife project dividends 2014 by Safrique Safaris

SPECIES	SEX	NO .KILLED	UNIT PRICE US\$	TOTAL PRICE US\$	45% DIVIDEND
Waterbuck	M	2	1 400.00	2 800.00	1 260.00
Impala	M	2	160.00	320.00	144.00
Impala	f	1	90.00	90.00	40.50
Total				3 210.00	1 444.50

Negande ward 8 Luyando wildlife project dividends 2014 by Safrique Safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US\$	TOTAL PRICE US\$	45% DIVIDEND
Buffalo	m	2	2 100.00	4 200.00	1 890.00
TOTAL				4 200.00	1 890.00

Nebiri ward 7 wildlife project dividends 2014 by Safrique Safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US\$	TOTAL PRICE US\$	45% DIVIDEND
Kudu	M	1	800.00	800.00	360.00
Klipspringer	M	1	400.00	400.00	180.00
Baboon	M	3	25.00	75.00	33.75
Buffalo	M	1	2 100.00	2 100.00	945.00
Buffalo	F	2	750.00	1 500.00	675.00
Zebra		2	800.00	1 600.00	720.00
Duiker	M	1	100.00	100.00	45.00
Sable	M	1	2 200.00	2 200.00	990.00
Leopard	M	1	2 550.00	2 550.00	1 147.50
Impala	M	2	160.00	320.00	144.00
TOTAL				11 645.00	5 240.25

Kasvisva ward 8 wildlife project dividends 2014 by Safrique Safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US\$	TOTAL PRICE US\$	45% DIVIDEND
Waterbuck	M	1	1 400.00	1 400.00	630.00

Elephant	t/l	3	2 100.00	6 300.00	2 835.00
S. Hyena	M	2	220.00	440.00	198.00
Buffalo	M	3	2 100.00	6 300.00	2 835.00
Leopard	M	1	2 550.00	2 550.00	1 147.50
Impala	M	1	160.00	160.00	72.00
Impala	F	1	90.00	90.00	40.50
Baboon		2	25.00	50.00	22.50
Total				17 290.00	7 780.50

Msampakaruma ward 9 (Ndechedu) wildlife project dividends 2014 by Safrique Safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US\$	TOTAL PRICE US\$	45% DIVIDEND
Buffalo	M	2	2 100.00	4 200.00	1 890.00
Hyena	M	2	220.00	440.00	198.00
Total				4 640.00	2 088.00

Msampakaruma ward 10 (Nyamambishi) wildlife project dividends 2014 by Safrique Safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US\$	TOTAL PRICE US\$	45% DIVIDEND
Leopard	M	1	2 550.00	2 550.00	1 147.50
Impala	M	1	160.00	160.00	72.00
Grysbok	M	1	80.00	80.00	36.00
Total				2 790.00	1 255.50

Msampakaruma 10 (Nyamambishi) wildlife project dividends 2014 by Bulembi Safaris/ Martin Pieters safaris

SPECIES	SEX	NO, KILLED	UNIT PRICE US\$	TOTAL PRICE US\$	45% DIVIDEND
Buffalo	M	1	2 100.00	2 100.00	945,00
Total				2 100.00	945,00

Summary of funds disbursed to the communities

Year	Ward	DIVIDEND RECEIVED US\$
2013	GACHE GACHE 2	19,834.88
	MOLA 3	67,029.5
	MOLA 4	43,983.00

	NEBIRI 7	24,113.25
	MSAMPAKARUMA 9	7,537.5
2014	GACHE GACHE 2	25 353.00
	MOLA 3	58 974.00
	MOLA 4	15 860.25
	NEGANDE 6	1 890.00
	NEBIRI 7	10 233.00
	KASVISVA 8	11 988.00
	MSAMPAKARUMA 9	3033.00
	MSAMPAKARUMA 10	2200.50

PROJECTS IMPLEMENTED BY THE COMMUNITY UNDER CAMPFIRE FUNDS

WARD	PROJECTS IMPLEMENTED
2 GACHE GACHE	Constructed GacheGache Sec School Classroom block
	Purchased GacheGache Sec School furniture
	Renovated GacheGache Sec Sch Teachers House
	GacheGache Pry Sch Repainting
3 MOLA	Constructed Musampa Fishing Camp Toilets
	Borehole Repairs & Maintenance
	Constructed Ward Office Toilets
	Purchased materials for construction of Mangwara School Teachers House
	Mola Pry Sch Computer room buglar bars
	DhobeSatelite School
	Construction of Kasiya Pre- School shed
	Dhundwe Pre-School renovation
4 MOLA	Kauzhumba Pipeline Food
	Traditional Ceremonies
	Brick Moulds (bricks for Mayovhe classroom block to be constructed)
	Purchased materials for construction of Jongola Primary School Teachers House
	Completion of Mayovhe Primary School Classroom Block -
	Rehabilitation of Marembera Pipeline
7 NEBIRI	Rehabilitation of Biri Water Pipe Line
	Construction of feeder roads
	Tractor Repairs & Fuels

	Ward Office Repairs & Maintenance
	Maya Pre - School Repairs & Maintenance
8 KASVISVA	Constructed Manhanga Pry School 1x2 classroom block
	Constructed Mamvuramachena Sec Sch 1x2 classroom block
	Constructed Mamvuramachena Pry Sch Admin block
	Renovated Mangare Pre- School
	Constructed Mutengu School Teachers Cottage
	Constructed SawiraMakwande Teachers Cottage
	Construed Black Boards for 2 satellite schools
9 MSAMPAKARUMA	Majazo Primary School Teachers House Repairs
	Chidyamugwamu Secondary School Teachers House Repairs
	Purchased materials for construction of Majazo classroom block

Wildlife anti-poaching efforts

<u>Year</u>	<u>Number of patrolled done</u>	<u>Snared recovered</u>	<u>Recoveries</u>	<u>Animal poached</u>	<u>Number of poachers arrested</u>
2013	139	76 cable snares	3 x303rifles 1x 458 rifle 10 rounds of AK47 30 rounds of	8 elephants 1 waterbuck 3 impala 1 buffalo	25 in connection of ivory dealing 51 in different wildlife counts
2014	150	89 cable snares	4 pairs of Ivory 1 x30-06 Rifle plus 2x 30-06 Rounds 3 X Banana boats plus 3 800Mitres twine nets and 17KG of dried fish 1x Pick, 1 x Shovel Plus crow bar	2 buffalo 7 elephants 2 impalas 1 duiker	15 in connection of ivory dealings 32 of different counts including fish poaching

(b) (6)

3/19/18 DATE

\$100.00

DOLLARS



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