Psittaculini Cooperative Breeding Program

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FORM 3-200-49

REQUEST FOR APPROVAL OF A COOPERATIVE BREEDING PROGRAM (CBP) UNDER THE WILD BIRD CONSERVATION ACT (WBCA)

Pursuant to 16 U.S.C § 4911, 50 C.F.R § 15.24, and 50 C.F.R. § 15.26

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OPA Counsel
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739 Washington Ave Suite 909
Miami, Florida 33030
Dir.: (305) 319-1309
opacounsel@opabirds.org

Counsel for Petitioner



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May 5, 2022

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: FORM 3-200-49, APPROVAL OF A COOPERATIVE BREEDING PROGRAM (CBP) UNDER THE WILD BIRD CONSERVATION ACT (WBCA)

Applicants:

Gerald Bobak (LEAD)

Laurella Desborough

Avicultural Oversight Organizations:

Organization of Professional Aviculturists (OPA)

Adjudicating Officer:

The law firm David Anthony Garcia PA represents: Gerald Bobak, Laurella Desborough, and the Organization of Professional Aviculturists (OPA), for the purposes of soliciting the approval of a Cooperative Breeding Program (CBP) for captive bred, Eclectus parrot (*Eclectus roratus*) under the Wild Bird Conservation Act (WBCA). Such programs are governed by 16 U.S.C. § 4911, 50 C.F.R. § 15.24, and 50 C.F.R. § 15.26.

The CBP will be operated from two aviaries, one located in Elligary, Georgia, and one in Claremore, Oklahoma. All the breeding stock will be acquired from captive breeding facilities located outside the United States and final import will be contingent on approval of individual import permits issued by the USFWS. The CBP will be operated with oversight from the Organization of Professional Aviculturists (OPA), which represents professional aviculturists in the U.S. and abroad. Included with this packet is a letter on OPA letterhead outlining the terms of the CBP agreement, signed by OPA President, Steve Duncan.



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A completed form 3-200-49, Approval of a Cooperative Breeding Program (CBP) is enclosed along with this letter and supporting documentation. Further documentation will be provided electronically upon contact by the USFWS, if so requested.

Based on the enclosed information, the proposed CBP, as constituted, satisfies the five criteria for approval set out in 50 C.F.R. § 15.26(b). First, the purpose of the proposed CBP is to establish self-sustaining populations Eclectus parrot (*Eclectus roratus*) in the United States. This species was imported to the United States without proper recording keeping as to their origins and has been improperly managed, rendering the existing population non-representative of wild bloodlines. Further, the creation of this CBP will have no detrimental effect on the wild populations of these species, as all breeding stock will be acquired from captive breeding facilities in non-range states. Transferring captive-bred specimens from one non-range state to another will have no discernable impact on wild populations.

Second, the approval of the CBP will have no negative effect on the survivability of the wild population because all imports will be from captive breeding facilities and final import will be approved by the USFWS.

Third, the approval of the CBP would not conflict with any known program intended to enhance the survival of the requested species in the wild because the import of the specimens will come from captive breeding facilities.

Fourth, the protocols proposed by the CBP will ensure that the population of this species in the United States is self-sustaining for the foreseeable future. The poor management of this species has left the U.S. population with mixed bloodlines that are unrepresentative of wild populations, a new, controlled population with clear genetics will rectify this problem. And the creation of a stable population of this species in U.S. aviculture will create a genetic repository for future reintroductions if necessary.

Fifth, the CBP will be self-funded by dedicate CBP members, both of which are respected breeders of Eclectus parrot (*Eclectus roratus*). And the OPA



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represents a deep pool of avicultural knowledge that will ensures that this CBP is operated with proper avicultural management.

Therefore, approving this proposed CBP will ensure that U.S. populations of Eclectus parrot (*Eclectus roratus*) is established and self-sustaining for the foreseeable future. Such a result will be a boon to the U.S. aviculture and to the continued existence of these species.

Thank you for consideration and prompt adjudication. Any questions please contact me directly at <u>david@davidgarcialaw.com</u> or 305-319-1309.

Thank you,

David A. Garcia Counsel of Record

David Anthony Garcia PA

lustitia est constans et perpetua voluntas ius suum cuique tribuendi

739 Washington Ave, Ste 909 Homestead, Florida 33030 (305) 319-1309 david@davidgarcialaw.com

Power of Attorney

I, Gerald Louis Bobak, have requested the representation of and consented to being represented by David Anthony Garcia, an attorney eligible to practice law in, and a member in good standing of the bar of the Florida Supreme Court, Bar Number 1015673, in relation to any matter before the USFWS, DOI, and USDA.

I consent to the disclosure of any records relating to me and my relevant matters that appear in any system of records of the USFWS, DOI, and USDA, to David Anthony Garcia.

I consent to have David Anthony Garcia speak on my behalf and request that all communications between the agency and myself be directed to David Anthony Garcia.

I request that the relevant agencies do not contact me without the presence and knowledge of David Anthony Garcia.

(Signature)

Gerald Bobak
Represented Party

David A. Garcia Counsel of Record

1-27-22

Date

Date

1/27/2022

David Anthony Garcia PA

Iustitia est constans et perpetua voluntas ius suum cuique tribuendi

739 Washington Ave, Ste 909 Homestead, Florida 33030 (\$05) 319-1309 david@davidgarcialaw.com

Power of Attorney

I, Laurella Desborough, have requested the representation of and consented to being represented by David Anthony Garcia, an attorney eligible to practice law in, and a member in good standing of the bar of the Florida Supreme Court, Bar Number 1015673, in relation to any matter before the USFWS, DOI, and USDA.

I consent to the disclosure of any records relating to me and my relevant matters that appear in any system of records of the USFWS, DOI, and USDA, to David Anthony Garcia.

I consent to have David Anthony Garcia speak on my behalf and request that all communications between the agency and myself be directed to David Anthony Garcia.

I request that the relevant agencies do not contact me without the presence and knowledge of David Anthony Garcia.

Laurella Dochorough

Laurella Desborough Represented Party David A. Garcia Counsel of Record

Date Date

01/31/2022

Date

FWS Form 3-200-49 (Rev. 01/2020) U.S. Department of the Interior OMB Control No. 1018-0093 Expires 08/31/2023



APPROVAL, AMENDMENT OR RENEWAL OF A COOPERATIVE BREEDING PROGRAM (Wild Bird Conservation Act)



□New □Reissue/Renew □Amendment

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C."

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Mail your application(s) to Division of Management Authority, Branch of Permits, MS:iA 5275 Leesburg Pike, Fails Church, VA 22041-3803.

^{**} Further instructions for the above application may be found on our ePermits website. See the last page for information on the Privacy Act, Paperwork Reduction Act, Estimated Burden, and Freedom of Information Act aspects of this application form.

E. APPROVAL, AMENDMENT OR RENEWAL OF A COOPERATIVE BREEDING PROGRAM (Wild Bird Conservation Act)

NOTE 1: This application must be approved before import permits can be issued for the purpose of cooperative breeding. <u>A Cooperative Breeding Program (CBP) must have at least two members</u>. Zoological institutions may be members of a CBP. Once a program is approved, you must submit application form <u>3-200-48</u> to request import authorization for specific birds.

NOTE 2: The <u>lead</u> cooperator (as identified on page 1) for the breeding program **must submit this application**.

Complete all relevant questions on the application. Mark questions that are not applicable with "N/A". Due to the length of some questions, please use separate sheets of paper to answer the application questions. On all attachments or separate sheets you are submitting, please indicate the number of the application question you are addressing. If requesting authorization for more than one species or subspecies, please answer questions 5-10 for each species/subspecies.

<u>Electronic submission of inventories</u>, photographs, and receipts/invoices: For hard copy submissions, if you wish to provide information electronically, please include a flash drive containing this information with your physical application.

	I want to:
	Establish a new cooperative breeding program (please answer all questions)
	Amend an existing cooperative breeding program; CBP#(If requesting new species, answers questions 4, 5, 6a, 6b, 6d, and 7; If requesting to add a member, answer question 7)
	Renew an existing cooperative breeding program; CBP#(If there are no changes to the membership or species in the CBP, please answer questions 11 and 12)
1.	Name and address where you wish the permit to be mailed, if different from physical address . If you would 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.
	David A. Garcia PA, 739 Washington Ave #909 Homestead, FL 33030
2.	Who should we contact if we have questions about the application (name, phone number, and e-mail)? David A. Garcia, 305-319-1309, david@davidgarcialaw.com
3.	Have you or any of the owners of the business (if applying as a business, corporation, or institution), 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. A description of the species/subspecies to be covered (imported) under the program, including:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name;

Eclectus parrot (Eclectus roratus)

Number of birds requested to meet the goals of the program (Note: indicate the total number of birds to be imported by all the members of the CBP for the life of the program);

100

c. The minimum number of participating facilities need to achieve management objectives – provide an explanation of how this number was derived; and

Two facilities. This will allow each individual facility to maintain an adequate population to ensure compatible pairs and genetic diversity. Two separate facilities will also allow for exchange when necessary.

d. Desired sex ratio.

50:50

- 5. A statement justifying the need for this approval, which includes information on the current U.S. captive population of the requested species/subspecies and the need for import of additional specimens. Information should include, if applicable, whether there is high trade of the species; it is being captive-bred for reintroduction purposes; you are collaborating with other groups to promote in-situ conservation, and the sustainability of the species in the long-term.
 - a. Provide a description of the cooperative breeding program that includes: managing genetic diversity as an important component to creating a long-term sustainable captive population; what scientifically grounded method(s) the CBP intends to use to measure both projected and current levels of genetic diversity within the population; and for projected gene diversity, the time frame that will be considered (for example, projected gene diversity at 100 years of 10 generations);

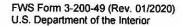
The CBP will source captive-bred Eclectus with known/documented parentage. The goal of the CBP is to promote maximal genetic diversity in the offspring, while maintaining distinct bloodlines based on the relatedness of the known/documented parentage of the founders. Founders will be permanently marked and parentage information will be recorded. A studbook will be vigorously maintained.

b. Description of the long-term plans for developing and maintaining a self-sustaining population in captivity of the exotic bird species;

The CBP will source captive-bred Eclectus with known/documented parentage. If feasible/necessary, founders will undergo genetic testing to determine relevant factors. Offspring will be exchanged between program members to ensure genetic diversity. A studbook will be developed that will carefully track parentage to create a self-sustaining population of unique blood lines.

 Details on the system of record keeping and tracking of birds and their offspring, including how individual specimens will be marked or otherwise identified;

Each individual in the CBP will be marked with ring or microchip for identification purposes which will correspond to an entry in the studbook. Detailed records will include age, sex, origin, generation, and relation to other individuals in the CBP. Pairing history will also be maintained.





d. Explanation on the relationship of the cooperative breeding program to the conservation of the exotic bird species in the wild. Include information on whether you anticipate importing captive-bred birds or wild caught birds and include identified sources to ensure that the number of birds that you anticipate needing will be available;

The cooperative breeding program seeks to import captive-bred specimens from respectable breeders. The species is regularly bred in captivity. As such, the approval of this CBP will have no negative effects on the wild population. However, maintaining healthy and genetically diverse captive gene pools is an important measure of ex situ conservation.

e. Information on the long-term funding of the cooperative breeding program to ensure its existence until the CPB's breeding goals are met; and

Funding to ensure the existence of the program is being provided through the private incomes of each CBP member to cover the costs of acquisition, importation, and maintenance.

f. Detailed plans for the placement of the program birds and any offspring, recalling that birds imported as part of a cooperative breeding program cannot be loaned, sold or otherwise transferred to a non-member without prior authorization of this office. Additionally, provide a description of how program birds will be dealt with if a member(s) leaves the program or if the program is voluntary terminated (members decide to disband and the program is not renewed) or involuntarily terminated (the Service does not renew the CBP).

All imported birds will be paired and pairs will be distributed amongst the members as they are imported. Offspring will be exchanged within the CBP. Those offspring not required by the CBP will be distributed to the zoos, trusted aviculturists, or the general public in that order of priority. If the program terminates the imported birds will remain with the CBP members or distributed to zoos or other aviculturists. If a member leaves the CBP, their imported birds will be purchased by other CBP members or retired from the program.

- 6. Describe care and maintenance of the requested species/subspecies, and how each prospective member's facilities meet professionally recognized standards (if requesting to amend an established CBP by adding new members, please provide the following for each proposed new member):
 - a. Name and addresses of each facility where the birds, by species, will be maintained;

Eclectus Ark, 14701 South 4240 Rd., Claremore, OK 74017 Burnt Mountain Avian Center, 5573 Burnt Mountain Rd., Elligay, GA 30536

b. In the table below, please provide the requested information for each type of holding space that will be used to house CBP birds. Use one row for each holding

Aviary type (outdoor vs. indoor flight cage, etc.). Add a separate row for type of aviary.	3. Dimensions of specific aviary/holding space (WxLxH). Please specify units (feet, inches, etc.)	4. How many aviaries fit these specifications?	5. What species will be housed in this type of aviary?	6. How many birds will be housed in each of the aviaries?	7. Will the birds be housed here permanently? If not, please provide additional information in the comments box below (i.e. why will the birds be moved and for how long).
Outdoor flight	10'x10'x8'	4	Amazona ochrocephala	Up to 4 birds in two of the flight cages. The two remaining flight cages will be vacant for future imports.	These cages will be used to socialize young birds or for surplus birds
Outdoor flight	8'x5'x7'	2	Amazona ochrocephala	2	These will be permanent breeding cages and the birds will remain here for multiple breeding seasons. If these birds are transferred, we will include that information in our CBP annual report.
Eclectus Ark: Breeding Flight Type 1	6'x3'x3'	6	Eclectus roratus	2	These will be permanent breeding cages and the birds will remain here for multiple breeding seasons.
Eclectus Ark: Breeding Flight Type 2	7'x3'x3'	3	Eclectus roratus	2	These will be permanent breeding cages and the birds will remain here for multiple breeding seasons.
Eclectus Ark: Socialization Flight	8'x'8'x32'	2	Eclectus roratus	Not to exceed 20 birds	These cages will be used to socialize young birds or for surplus birds.
Burnt Mountain Avian Center	6'x7'x18	2	Eclectus roratus	Not to exceed 20 birds	These cages will be used to socialize young birds or for surplus birds.
Burnt Mountain Avian Center	4'x4'x6'	20	Eclectus roratus	2	These will be permanent breeding cages and the birds will remain here for multiple breeding seasons.
	vs. indoor flight cage, etc.). Add a separate row for type of aviary. Outdoor flight Outdoor flight Eclectus Ark: Breeding Flight Type 1 Eclectus Ark: Breeding Flight Type 2 Eclectus Ark: Socialization Flight Burnt Mountain Avian Center	vs. indoor flight cage, etc.). Add a separate row for type of aviary. Outdoor flight Outdoor flight Eclectus Ark: Breeding Flight Type 1 Eclectus Ark: Breeding Flight Type 2 Eclectus Ark: Socialization Flight Burnt Mountain Avian Center aviary/holding space (WxLxH). Please specify units (feet, inches, etc.) Please specify units (feet, inches, etc.) 10'x10'x8' 6'x3'x3' Flight Type 1 8'x5'x7' 6'x3'x3' Fight Type 2 8'x'8'x32' Burnt Mountain Avian Center 4'x4'x6'	vs. indoor flight cage, etc.). Add a separate row for type of aviary. Outdoor flight Outdoor flight Outdoor flight Outdoor flight Eclectus Ark: Breeding Flight Type 1 Eclectus Ark: Breeding Flight Type 2 Eclectus Ark: Socialization Flight Burnt Mountain Avian Center aviary/holding space (WxLxH). Please specific ations? inches, etc.) aviaries fit these specifications? aviary/holding space (WxLxH). Please specific ations? aviaries fit these specifications? aviaries fit these specifications? aviaries fit these specifications? 6 A Sx5'x7' 2 Eclectus Ark: Breeding Flight Type 2 Burnt Mountain Avian Center aviaries fit these specifications? 6 A Sx5'x7' 2 Burnt Mountain Avian Center aviaries fit these specifications? 4 A A Burnt Mountain Avian Center aviaries fit these specifications? A A A Burnt Mountain Avian Center aviaries fit these specifications? A A A A Burnt Mountain Avian A A A A A A A A Burnt Mountain Avian A A A A A A A A A A A A A	vs. indoor flight cage, etc.). Add a separate row for type of aviary. Outdoor flight Outdoor flight Outdoor flight Outdoor flight S'x5'x7' Cutdoor flight Outdoor flight Outdoor flight Outdoor flight Outdoor flight S'x5'x7' Cutdoor flight Outdoor flight Outdoor flight S'x5'x7' Cutdoor flight S'x5'x3' Cutdoor flight Cutdoor flight S'x5'x3' Cutdoor flight Cutdoor flight S'x5'x3' Cutdoor flight Cutdoor f	vs. Indoor flight cage, etc.) Add a separate row for type of aviary. Outdoor flight Outdoor

space type (flight cages with different dimensions should be listed on separate rows as should indoor vs. outdoor aviaries).

FWS Form 3-200-49 (Rev. 01/2020) OMB Control No. 1018-0093 U.S. Department of the Interior Expires 08/31/2023 For each type of aviary listed above, please provide a photo with a caption indicating the 'type' as listed in column See Attached. Please provide information on where any progeny will be housed. d. Any progeny will be housed on-site in communal aviaries, when appropriate, until they reach breeding age or are distributed out of the program. Please provide husbandry practices specific to each species as necessary. e. All birds will be provided with a diet that includes fresh fruits and vegetables, as well as pelleted diets. Fresh water will be provided daily. Artificial nest boxes will be provided. Pairs will be monitored for health and compatibility. Where appropriate and/or necessary, eggs and chicks will be removed for artificial incubation and hand-rearing. Veterinary care will be provided in compliance with the to be published USDA Animal Welfare regulations. Provide a qualification statement for EACH individual who will be participating in CBP. This statement f. should include records showing the participant's prior breeding experience with bird species that are the same or similar to the species in the CBP. Please see attached.

- 7. Each CBP must identify an appropriate avicultural, zoological, or conservation organization that has agreed to oversee its activities. Please provide a statement from the designated oversight organization, on the organization's letterhead, that includes at a minimum:
 - Description of the expertise of the organization to serve as an oversight organization;

See attached

b. Criteria for acceptance of individuals into the proposed breeding program;

See attached

c. How participation in the program will be monitored; and

See attached

d. Relationship of the oversight organization to the CBP in establishing and maintaining a selfsustaining captive population of the exotic bird species or enhancing the conservation of the species in the wild.

See attached

- If you are amending or renewing a program, you must also provide the following information in a table format:
 - a. The number, species, and sex of all birds that have been imported to date for your CBP, including dates of import, countries of origin, disposition of the imported birds for each importer, and associated permit numbers for each permit. Identify the number of birds within each species and their sex held at each facility;

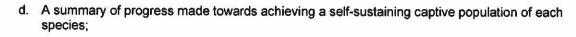
n/a

 For each program participant, a summary of any breeding activity that has been achieved with the imported birds, including the number of eggs and progeny produced, and the disposition of any progeny;

n/a

c. For <u>each</u> program participant, a summary of any mortality, including mortality during transit or quarantine (for birds that died in quarantine, you must provide appropriate documentation from USDA/Veterinary Services) of birds imported as part of the approved cooperative breeding program, as well as details of any post-fledging mortality of their progeny;

n/a



n/a

e. An explanation of any substantive changes that have or will occur regarding any aspect of the approved cooperative breeding program; and

n/a

f. An official letterhead statement from the designated oversight organization approving the amendment or renewal.

n/a

- 9. Provide a signed and dated statement from <u>each</u> CBP member. The statements must contain the following information:
 - a. Member name;

See attched

b. Scientific name of all species being requested for the program;

See attached

c. Statement that the member is aware of the purposes of the cooperative breeding program and the Wild Bird Conservation Act and will abide by the regulations and conditions placed on the program, if it is approved.

See attached

DOCUMENTS RELATING TO GERALD BOBAK

David Anthony Garcia PA

Iustitia est constans et perpetua voluntas ins suum cuique tribuendi

739 Washington Ave, Ste 909 Homestead, Florida 33030 (305) 319-1309 david@davidgareinlaw.com

Statement Requested by Question 9(a) - (c)

I, <u>GERALD L. Bosak</u>, am aware that the purpose of the proposed Cooperative Breeding Program is to establish a self-sustaining population of Eclectus parrot (*Eclectus roratus*) in U.S. aviculture.

I further understand that the purpose of the Wild Bird Conversation Act is to provide a series of nondiscriminatory measures that are necessary for the conservation of exotic birds and furthers the obligations of the United States under the CITES.

I promise that I will abide with the regulations and conditions placed on the program by the USFWS if the proposed CBP is approved.

(Signature)

GERALD L. BOBAK

(Print Name)

21 MAR. 2022

(Date)

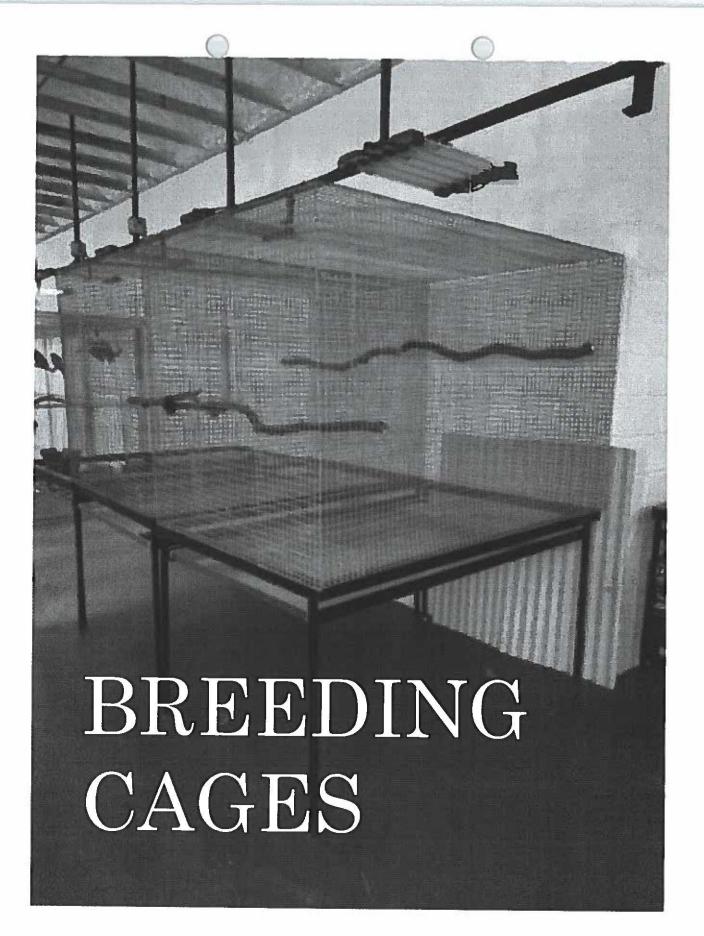
Experience Declaration of Gerald Bobak

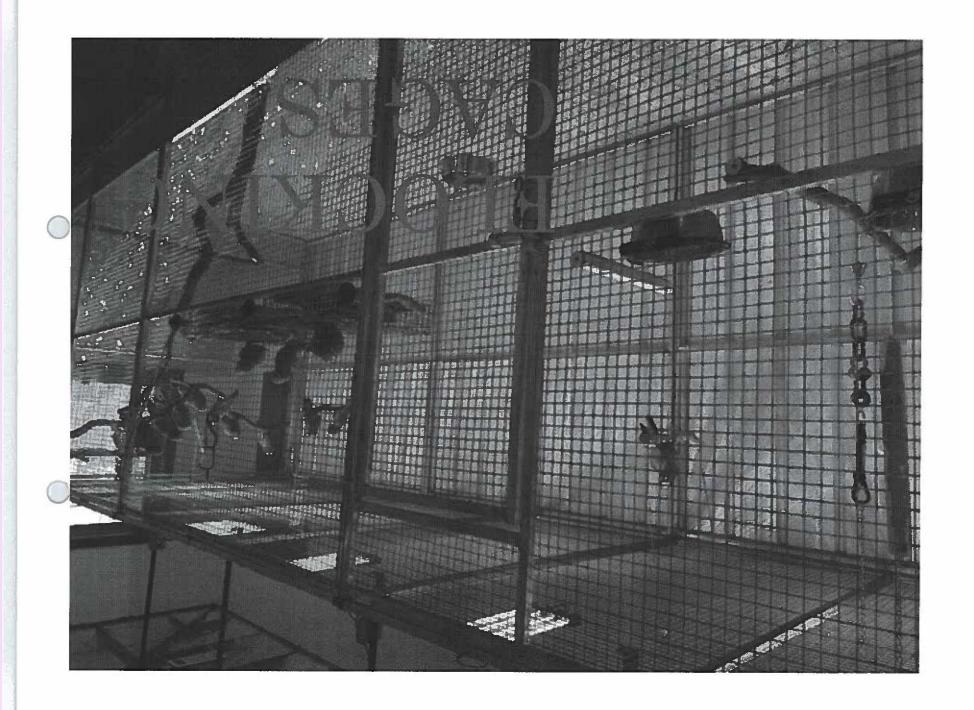
l, Gerald Bobak have bred and raised many Eclectus over my lifetime. I have attached my breeding records for 2022 in support of this declaration.

I declare, under penalty of perjury that the foregoing statement and attached pages are true and correct.

Executed on 5-4-22 (date)

Gerald Bobak



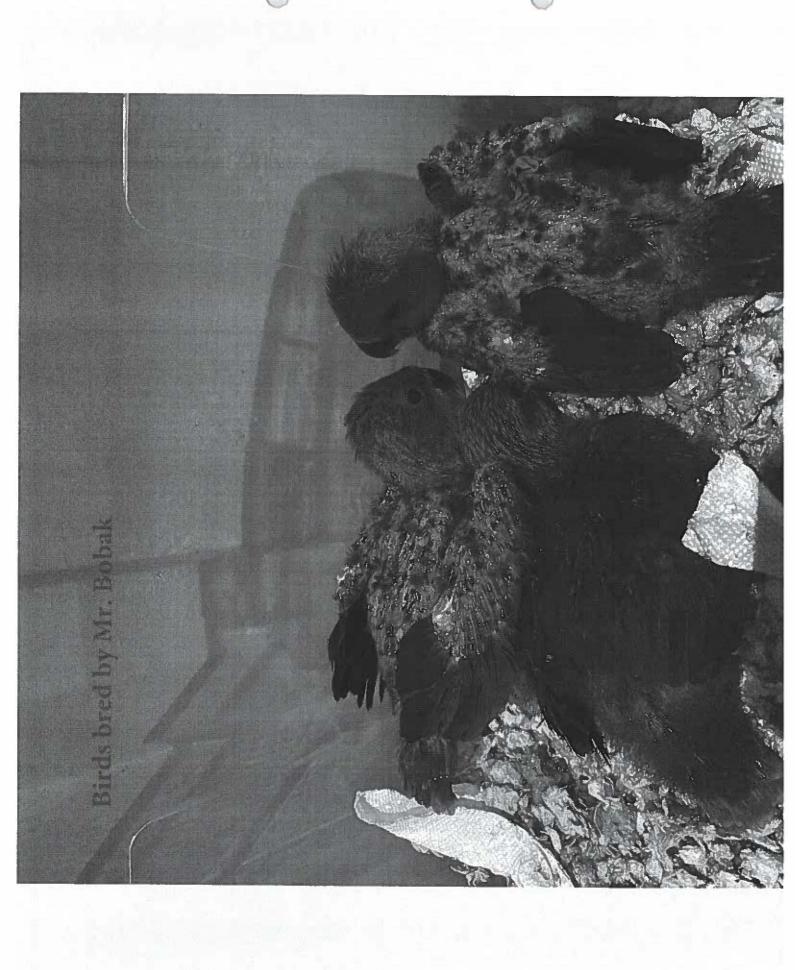


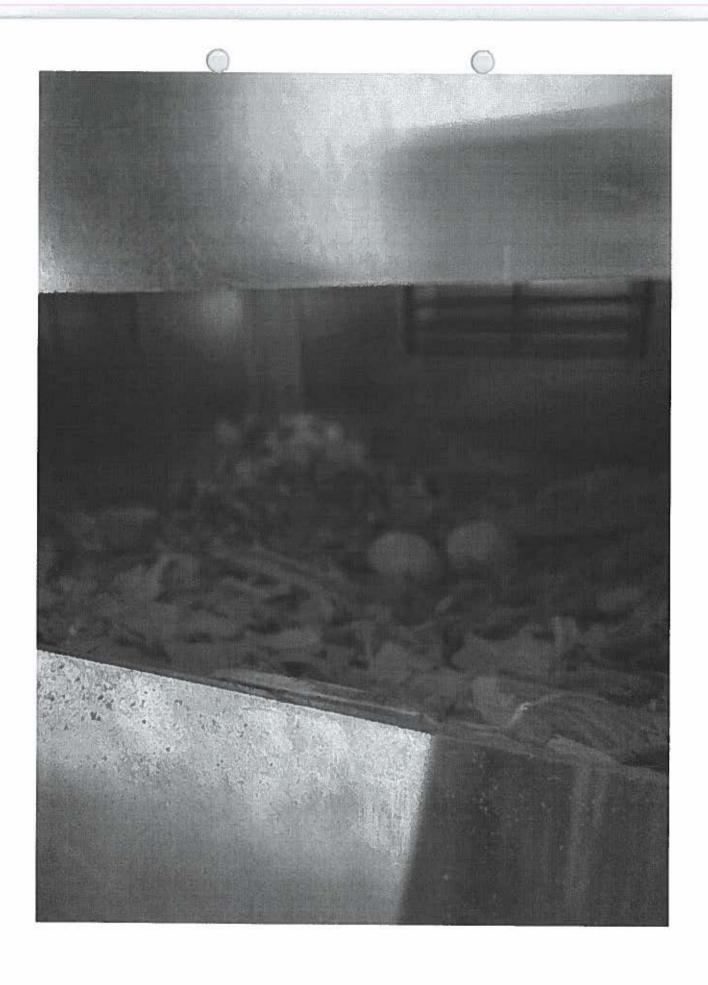
		17	20			7005
Species:	E	clea	tus		Formula:	
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Incubated?:	F	aces	dsh	ncubates	Date Pulled:	Parent Raised
3. -	CA	GE/BO	× #/		ID/Band Number:	
Hatch date:			V #		Disposition:	
DATE				Weight (grams)	DATE	Comments
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12/31/21	Eld	2			N/A	both eggs Intertile
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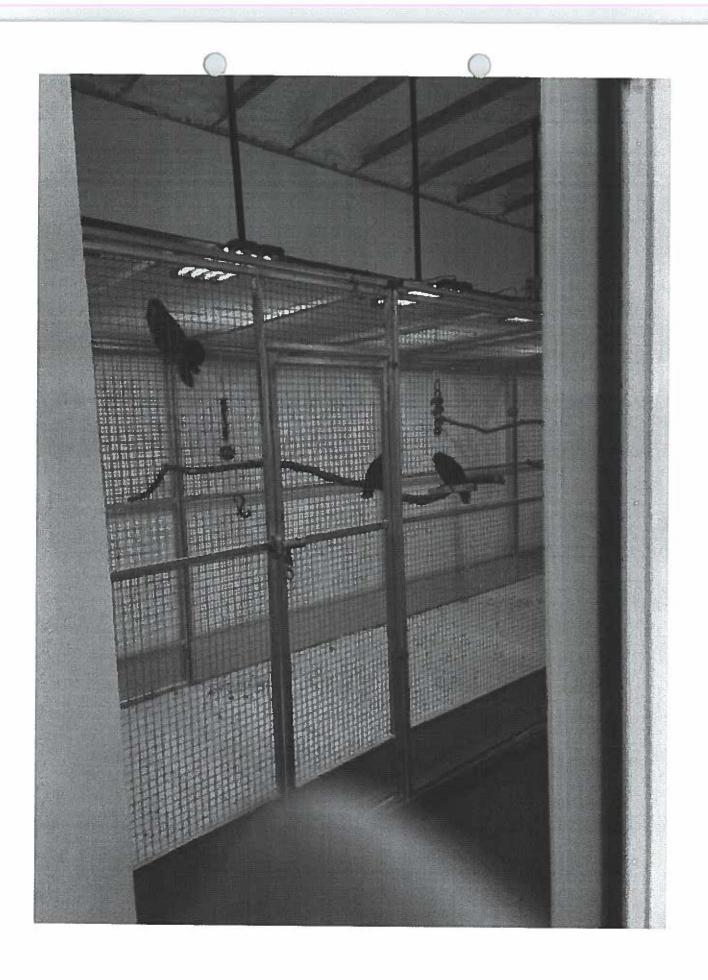
	_	3 4 0		Cw1-		Page
Species:	EC	sec	tus		Formula:	
Subspecies:	50	loa	on K	sand.	Porents:	Band # 2129 6# 2008
				ubated	Date Pulled:	Band#2129 1# 2008 Parent Raised
			/Box		ID/Band Number:	
		MUGE	1 1000			
Hatch date:		-			Disposition:	
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-/						
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2/21/29	EGE				3/21/22	
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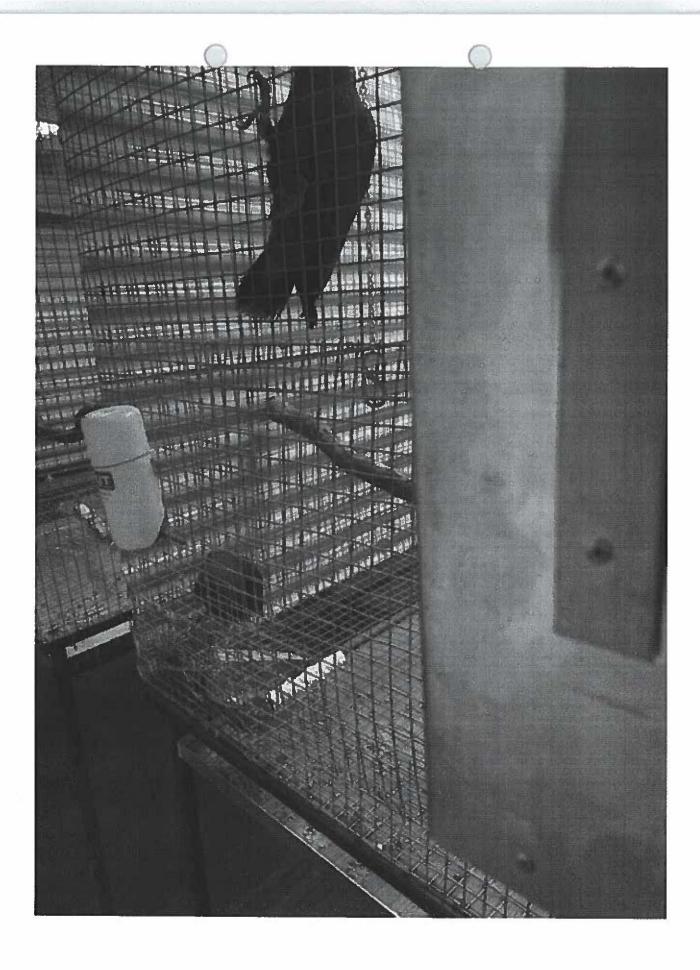
			~			7608		
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Incubated?:			-70.04		ORDate Pulled:			
Name:	CAG	E/B	ox #	3	ID/Band Number:			
Hatch date:					Disposition:			
DATE				Weight (grams)	PATE	Comments		
		-				10		
112922		-1_			N/A	FIRST TIME PARENTS BOTH FEGS INFERTILE		
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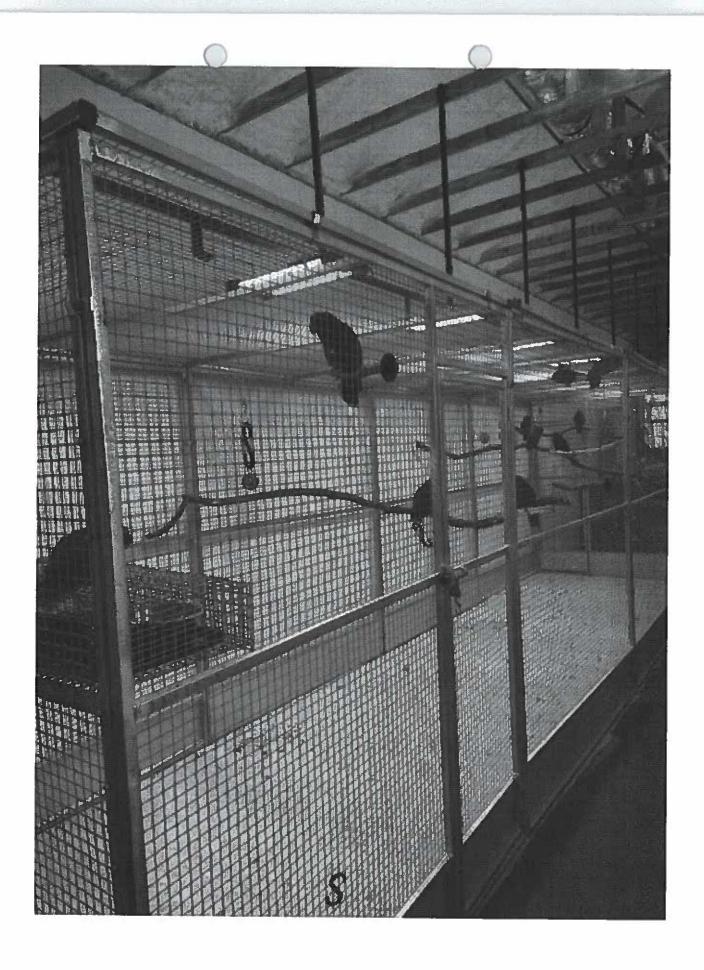
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Incubated?:					ORDate Pulled:	
Name:	Co	GE/	Box #	4	ID/Band Number:	
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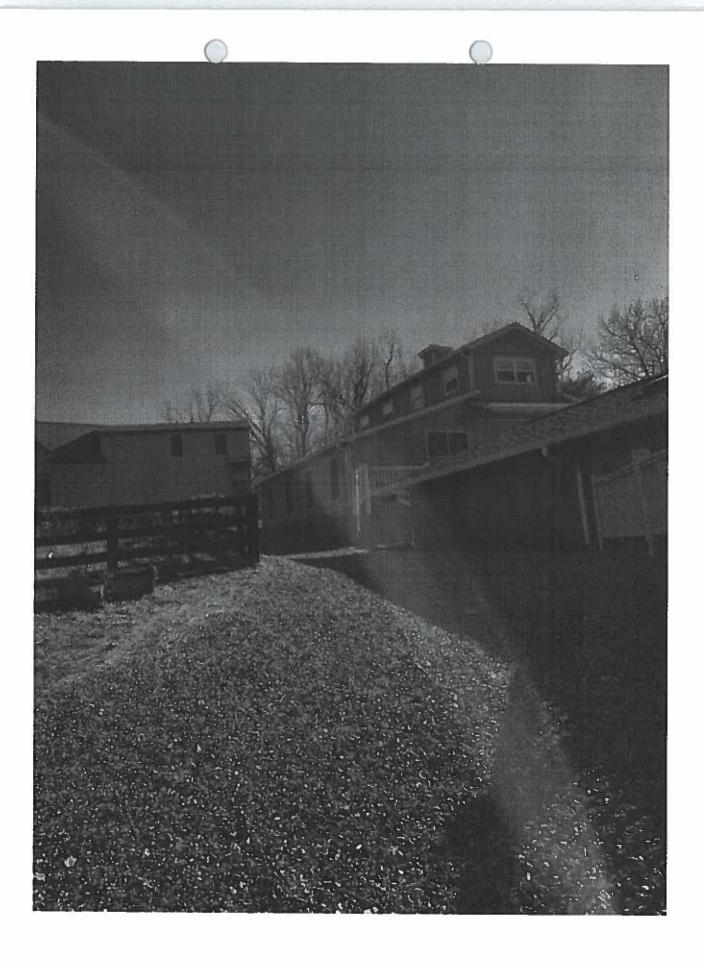


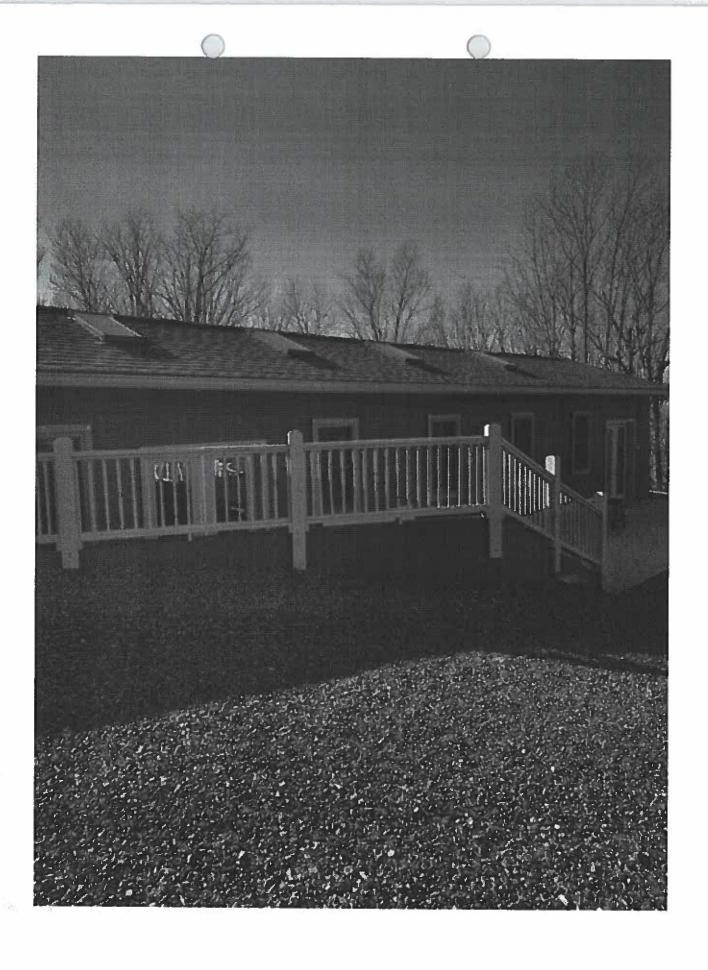


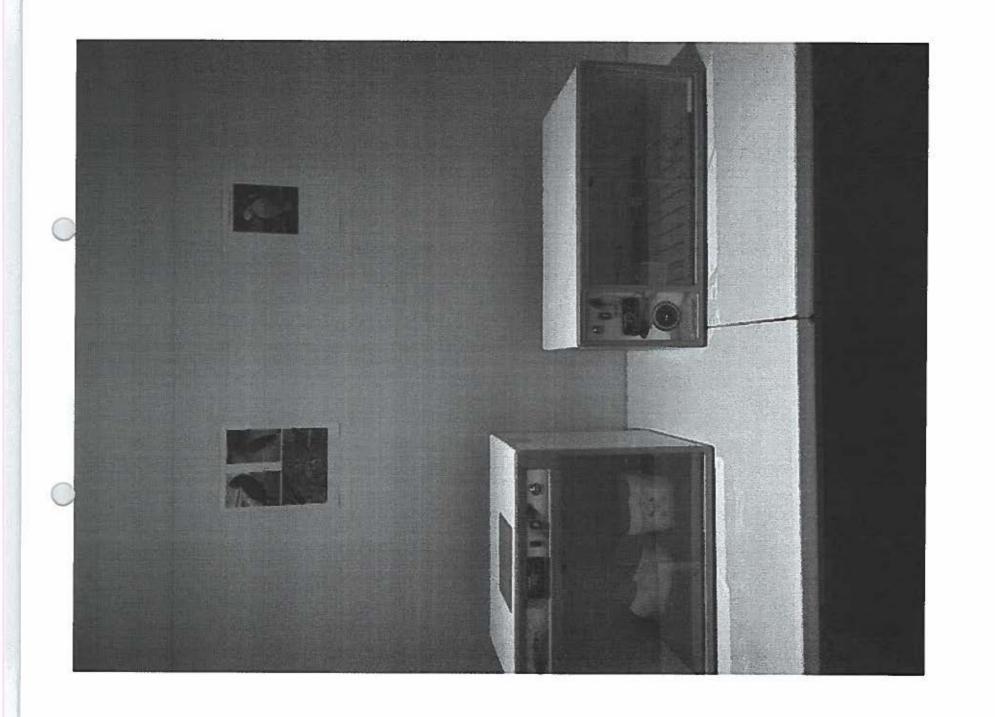


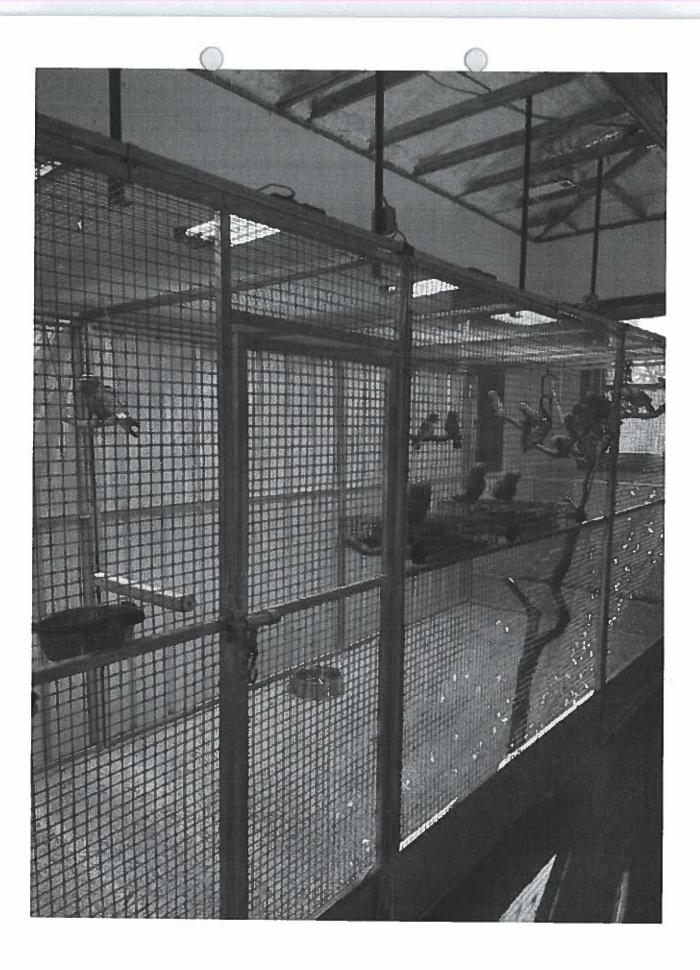


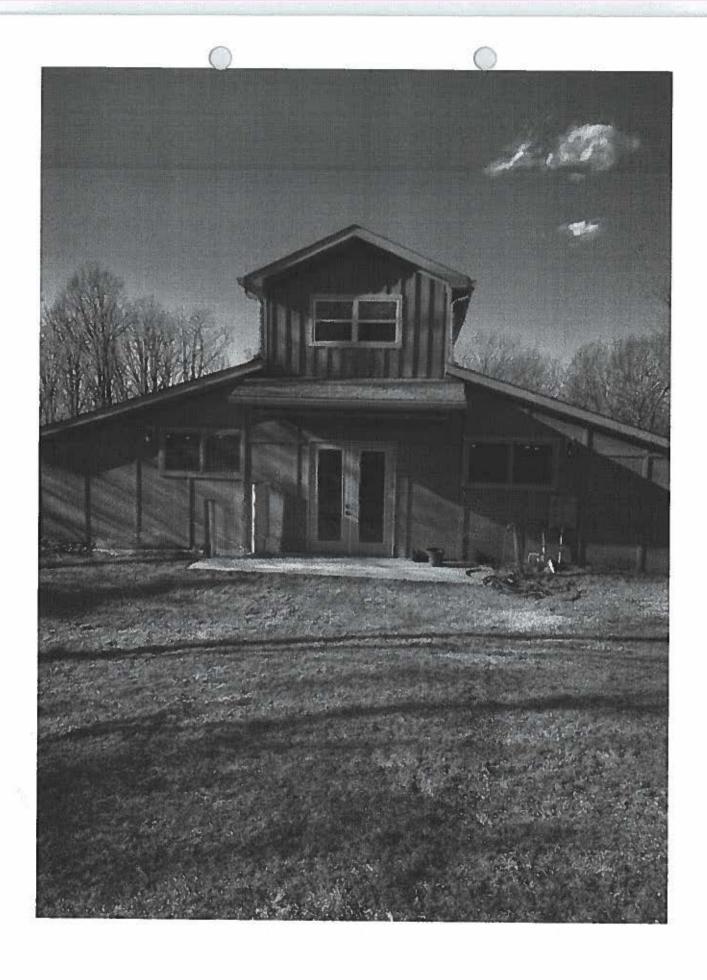


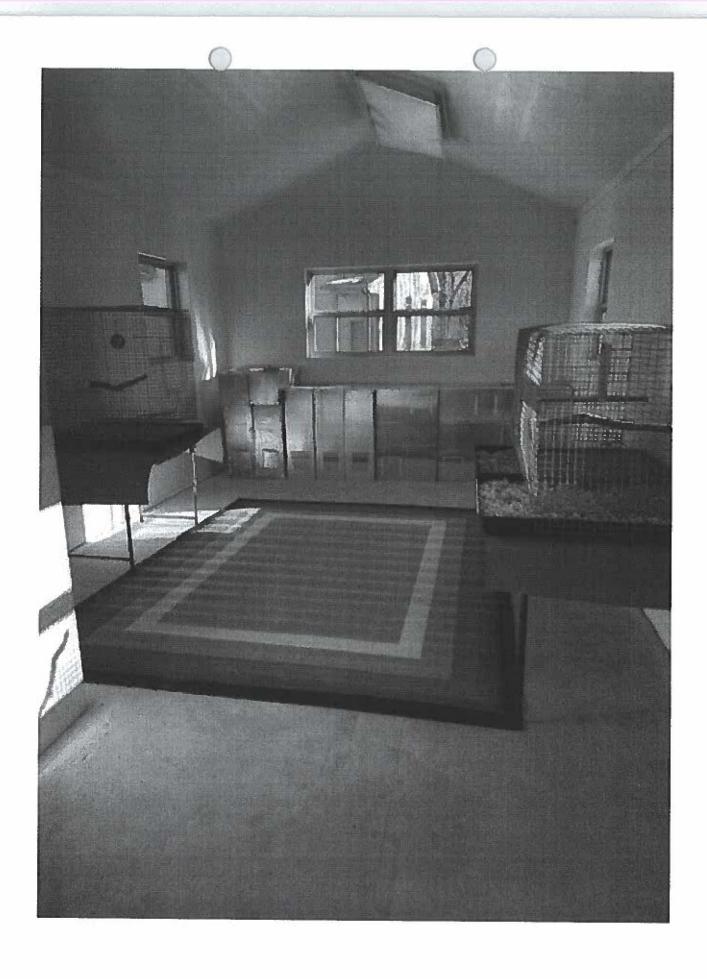




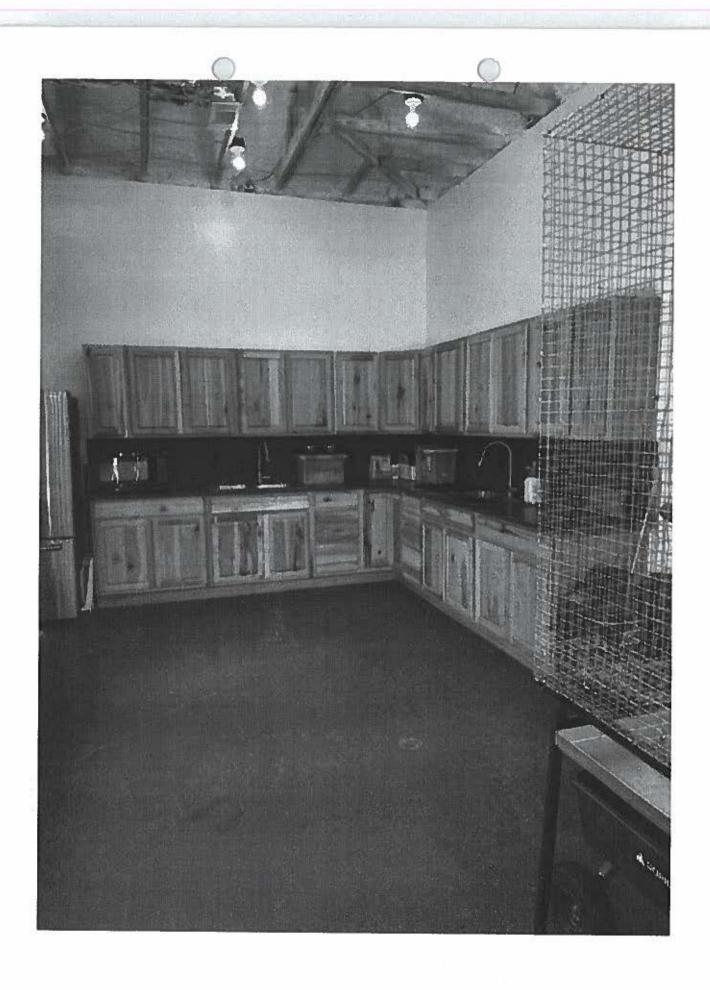


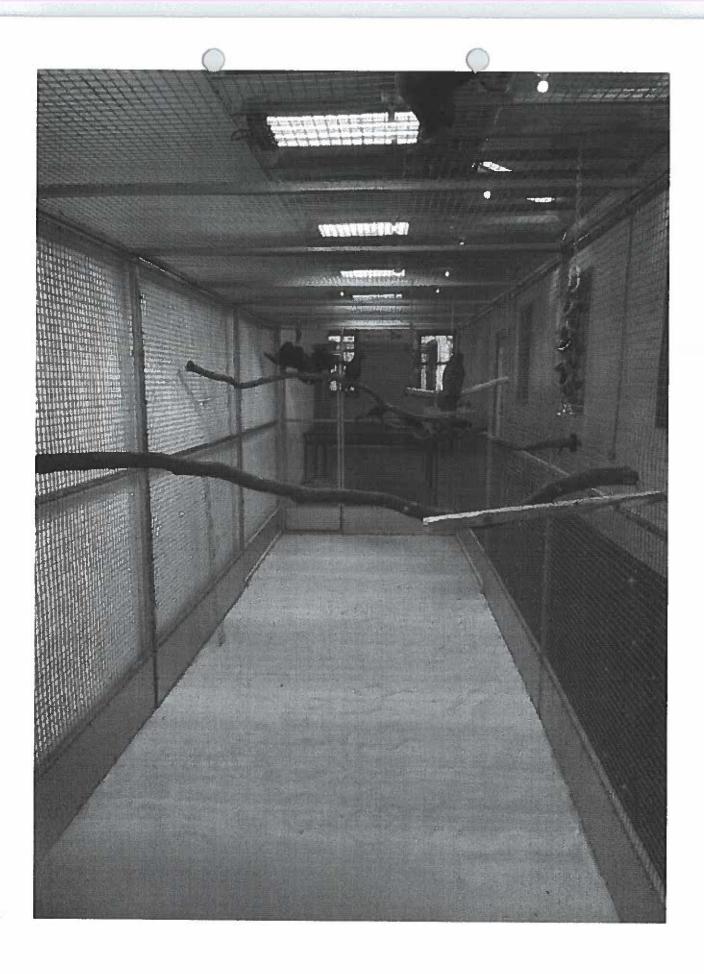




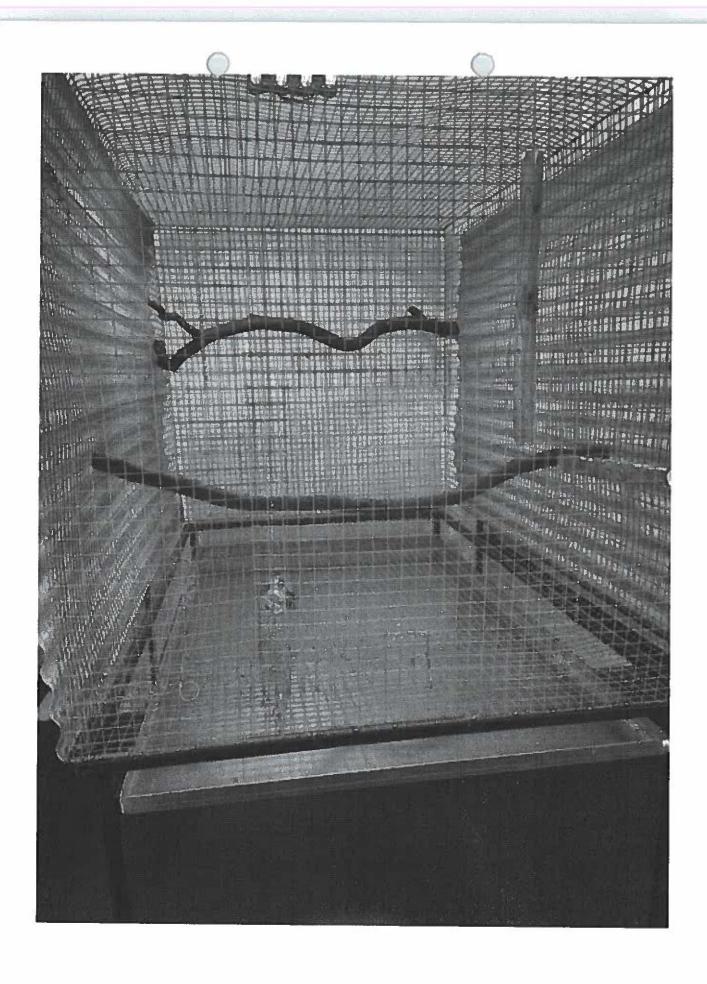


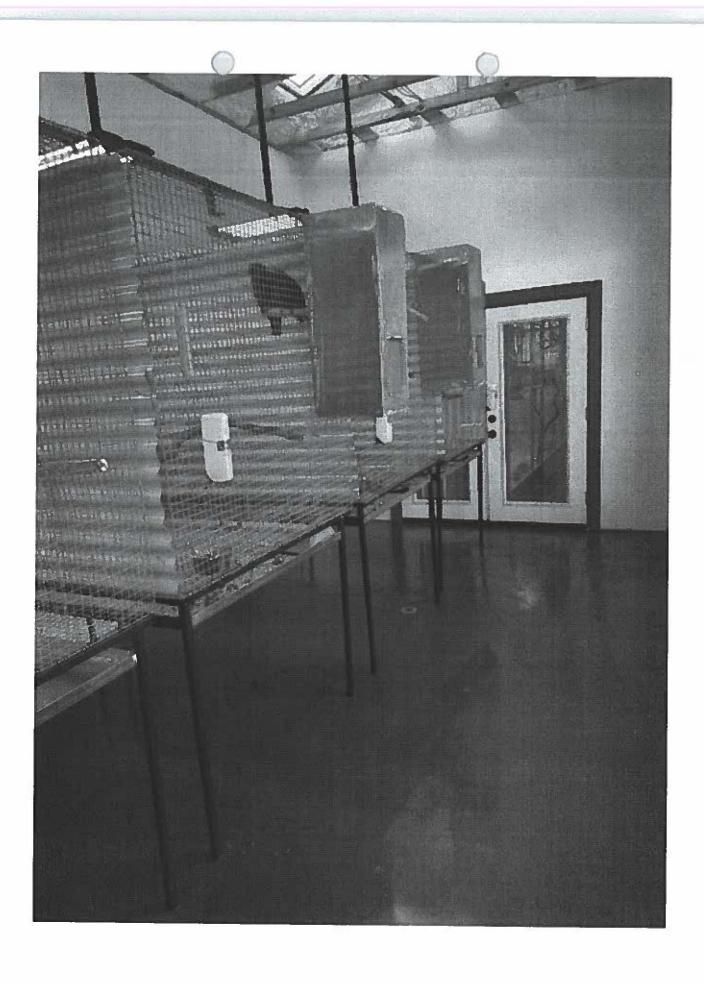


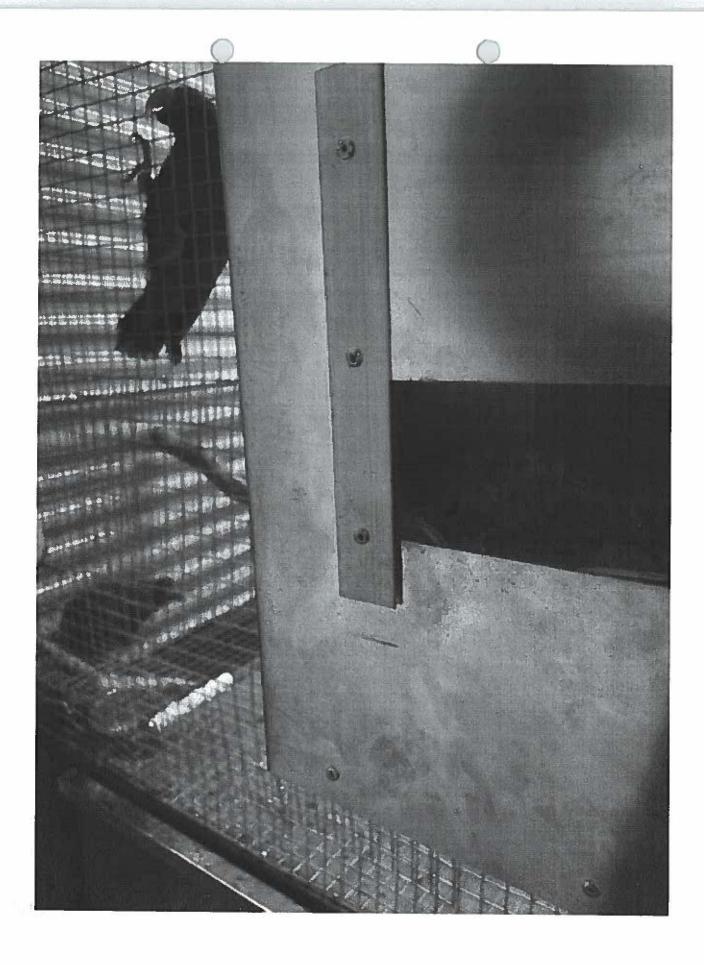


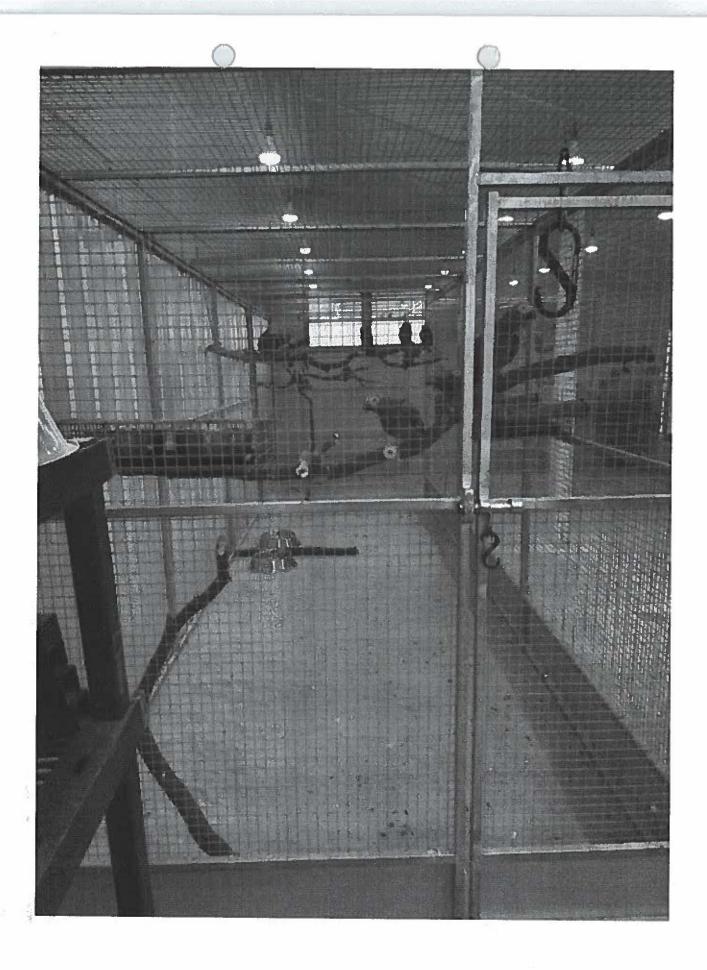


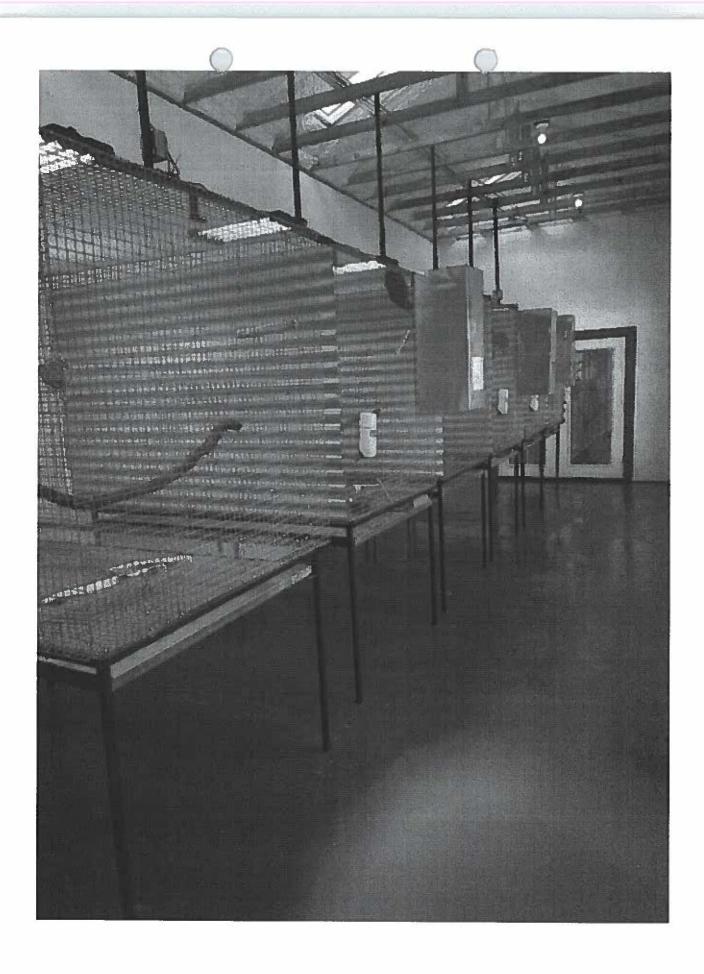












DOCUMENTS RELATING TO LAURELLA DESBOROUGH

David Anthony Garcia PA

Tustitia est constans et perpetua voluntas lus suum cuique tribuendi

Washington Ave. Ste 909 Homestend, Florida 33030 (808) 319-1309 david@davidgazcislaw.com

Statement Requested by Question 9(a) - (c)

I, <u>LAURELLA</u> <u>DESERROCCH</u> am aware that the purpose of the proposed Cooperative Breeding Program is to establish a self-sustaining population of Eclectus parrot (*Eclectus roratus*) in U.S. aviculture.

I further understand that the purpose of the Wild Bird Conversation Act is to provide a series of nondiscriminatory measures that are necessary for the conservation of exotic birds and furthers the obligations of the United States under the CITES.

I promise that I will abide with the regulations and conditions placed on the program by the USFWS if the proposed CBP is approved.

(Signature)

LAURELLA DESBORDUGH

(Print Name)

March 27, 2022

(Date)

Experience Declaration of Laurella Desborough

I, Laurella Desborough, have been raising Eclectus parrots since 1985 and have raised over 700 offspring. Some of these offspring were pulled from the nest at 2 weeks and hand raised, others have been hand raised from day one, and some remained in the nest to be parent reared for future use as breeding birds.

I have also raised other parrot species: Hawkheads, Brown headed parrots, Severe macaws, caiques, various large macaws, most of these from day one incubator hatches. I have raised most of these species from day one incubator hatches. I have kept weight and development records on all the parrots that I have hand raised. The records I am providing are only from the most recent years 2018 to 2021.

I have provided the entire weight records on the first bird noted, but all the rest are just the first page of each individual or of the clutch of 2 or 3 birds, because otherwise we would have too many pages to scan and send.

By keeping these detailed weight and development records, I have been able to write accurate information for others who keep and breed these parrots: including brooder temperatures, types of formula, expected weight development parameters and dates of first flights and weaning.

I declare under penalty of perjury that the foregoing statement and attached pages are true and correct.

Executed on March 30, 2020 ate).

Laurella Desborough.

VOO C 30 Pair PEDIATRIC RECORD PAGE Start Hand Feeding Date: /_ Ident. / Band Ident. /Band Start Hand Feeding Date: Start Hand Feeding Date: Ident./Band #: Bands: DESBORO 391 sto ornula Used: #1 (bnd# #3 (bnd# Weight Vol Weight | Vol Comments C 20 380

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PEDIATRIC RECORD Species: Start Hand Feeding Date: /_/ Ligent. / Band &n: 59/ Hatch Date: _/_/_ Start Hand Feeding Date: / / Ident Band 4: 392 Hatch Date: / / Start Hand. Feeding Date: / / Ident. / Band #: Hatch Date: / / Fornula Used: 01 | 02 (bnd0) Weight | Vol | #1 (bnd# Vol Weight | Comments 9-17 500 503 380 30 500 29

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VUS PEDIATRIC RECORD Species: PAGE 6 Hatch Date: 7,25 18 Start Hand Feeding Date: /_/_ Ident. / Band #n: 39/ Hatch Date: 7, 27, 18 Start Hand Feeding Date: / / Ident./Band 1: Start Hand . Feeding Date: / / | Ident . / Pand #: Hatch Date: / / Fornula Used: #1 (bnd# 1) #2 (bnd Weight | Vol | Weight #2 (bnd#) | #3 (bnd#) Weight | Vol Vol ×11-20 800 RSP fresh to to speeds extens grash 3 seeds will

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Species: 50 para

PEDIATRIC RECORD

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ornuli	usea:			Λ				
Age		# #1 (bnd)	12 Post	1 Trys	0 13 (bnd	(9)	
Date	Time	Weight	1 Vol	Weight	I Vol	Weight		Comments
			=====		======			
2-26	TET M	Dulled	WHOOD.	3-8	800	246	25	temp down
	930	113	10		290	247	29	
12		101-	11		130.	2.47	38	
	400	1144	11		12an	260	25	SHEED TO SHEET SHEET
米	down	coming to		3-9	900	259	126	
	1m	115	13		230	261	30	
	Am.	123	12		800	273	127	
	1/03	123	16		1230	1284	121	5 73 (ft) 8
2-28	430	126	16	3-10	900	284	31	
	345	134	14		2.70	292	30	A SECOND CONTRACTOR OF THE PROPERTY OF THE PRO
	1245	140	10		800	30211		
	690	135	15	1-	1230	190	33	
	12	140	17	3-11	800	303	36	
3-1	500	142	15	Section 1	230	305	30	
Talk 4	1030	146	16	1 5 10	11pm	30/	32	respensopening
->	ayer	april in	10	3-12	9/30	305	28	
11/01/0	3m	147	18	-	im	318	34	3
	1/30	100	17		Com 1	A STATE OF THE PARTY OF THE PAR	33	10-11-11
3-7	430	163	16	7-13	0.2	318	32	To the State of th
	930	1/4	14	7-13	13.70	224	30	THE RESERVE
	230	167	13		1m	3 22	41,	A 178
	700	170	-		7m	377	30	
2.5	12	175	16	0.0	800	333	30	C 20074 & 420 H 200
3-3	6 am	173	18	3-14	1720	337	32	
778 E 1 ME	1/32	180	15		020	7212	37	0 -
	1200	176	17		1120	360	30	· : :
7. 11	123	100	18	73-15	S Act	337	743	Christian Committee Commit
200	1000	191	21	15-15	270	341	34	
	11 30	100	17		- T	361	34	
	10	192	2		Tan	377	38	1746.21
7 6-	180	196	20	3-16	1000	37/	36	1 機
7-2	1230	202	21	1	330	356	37	19 - 380 Page 19 - 19 - 19 - 19 - 19 - 19 - 19 - 19
	1030	209	21		800	381	36	
	1230	211	20	Albert Comment	1230	40300	32	En the will stall the
マーム	RN	211	21	3-17	822	382	30	
, it is	2.00	217	20		230	377	40	THE WATER OF A P. LEWIS CO., LANSING
13/15-00	11ºDM	210	35	E ME TO	820	392	36	
3+7	630	221	22 25 23		12	414 ne	33	
N. Trans	1900	225	28	13-18	1000	396	37	The state of the s
	700	229	26		230	390	34	
1	1230	243	23		8m	398	38	1
196-1	100	34 92			12	415	34	811 35

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PED RIG RECORD Species: PAGE Hatch Date: 3/8/2019 Start Hand Feeding Date: /_/___ Hatch Date: 3/10/2019 Start Hand Feeding Date: /- / Ident./Band #P-393 Start Hand Feeding Date: / / Ident./Band #: Hatch Date: / / Formula Used: 4.394 12 (bnds 8395 1) 13 (bnds #1 (bnd# Vol Weight | Vol Weight | .Vol Comments Date : -----******************** 5-8 506 50 504 AD 50 50. 516 cuttingharle souther up 5% 30 soil UD Soul 4.00 465

Species: Mrucy 9 PEDIATRIC RECORD PAGE / Hatch Date: \$\frac{p}{122,2019} Start Hand Feeding Date: _____ ___ ___ \ldots \\ \frac{1}{2019} \\ Start Hand Feeding Date: / / Ident./Band \$: Hatch Date: / / Start Hand . Feeding Date: / / | Ident . / Pand 0: ' Hatch Date: / / Formula Used: temp 950 Zupram Weight | Vol | Weight | Vol #3 (bnd# ___) Weight | Vol Comments 207 21 7au *************** 200 20 205 20 940 412 3 X May 505 20 20

w. or early although

PEDIATHIC RECORD

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Hatch Date: 6 /7/2019 Start Hand Feeding Date: /_/ Ident./ Band \$n:

Hatch Date: / / Start Hand Feeding Date: /_/ Ident./Band \$:

Hatch Date: / / Start Hand.Feeding Date: /_/ Ident./Band \$:

Start Hand. Feeding Date: _/_/_ Ident./Band #: Hatch Date: / / Zwfreem Fornula Used: Patha tem 43 (bnd# #1 (bnd# Age Height । अता Vol Comments Weight Vol Weight Date 6-24 2,0 2300 11.5 530 2,0 18-18 4am 930 3.0 615 .130 3.0 645 2.0 900 1,5 25 2.0 23.5 .5 6-25 25,5 2.0 330 890 26 B 2.0 lod0 1190 125 27 2.0 042 30 13 1130 230 12,5 6-19 2.0 28.500 12,5 500 1.0 19. 6-210 5 30 ne 200 10 1030 30E 25 2.6 230 91 13 1230 6 34 20 245 32.5 6m 375 3,0 Bon feces plate bud plate 3.0 23. 14 ne 1130 390 6-20 A00 Brooder, 960 36 830 30 700 14 1770 96 3.0 10 6 1 do 3,5 1.0 42.5 11.30 14.5 730 43.5 330 100 800 6-29 600 4.0 1230 1,5 41 15.5 11 40 1.0 430 1,0 800 1130 8 30 7.5 1.5 Brooks 94-96 P 6-22430 2.0 Reads 1000 @ 400 105 6-30 1283 1030 Form Coming them 5.0 230 58 830 5,5 6.0 Am Zo ne 5,0 6-23 5 am 20.5 605 7.0 830 21 69 100 2.0 2.5 20 66 8,0 21 20 1.5

Species: AM LON

PEDIAL C RECORD

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VINEACOUS .

Hatch Date: 7 1/4/2019 Start Hand Feeding Date: / -/

Ident. / Band In:

Hatch Date: / / Start Hand Feeding Date: /- /

Ident./Band #:

Hatch Date: / / Start Hand Feeding Date: / /

Ident./Band #:

Fornula	Used:	Fred	3X	a day	Zu Preem
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			The second	150 150 100 100	12.4.15.2115

Age Date	Time	#1 (bnd) Weight	Vol	#2_(bnd)	Vol	#3 (bid Weight	Vol	Comments
8-13	1030M	312	33	9,26	230	380	40	Pulled empty on 813 12
0-13	930	319	36	11/2411	6 m	367	36	
8-14	And the last of th	315	40		122	301	45	Management of the control of the con
oday	old	long of	7	8-27	230	390	33	
Ogay	12 M	133	34		630	277	50	Waste State of the
UIRIS AND	Carl 5	- 1 1 -	of Belan	8-28	Sign	375	34	
8-15	#30	226	45	15.75 (O. L.)	744 V	371	56	
0-4	able	tostand	MOU	BEALT TO STATE	19-	413	41	THE RESERVE OF THE PARTY OF THE
	330	237	ALD	8-29	984	400	42	The State of the S
	Stan	was feld.	1	国 第一个	low	373	48	CONTRACTOR OF THE STATE OF THE
2 T 138	411.	and below	a drawe	8-30	800	3910	68	Guto Ce as
	1130	347	42		7.04	385	64	
8.16	0	336	48	831	200	270	52	arut bit beek
St. In	1	362	30		736%	382	45	
+ (9)	180	3 12	47	911	200	275	56	PERSONAL SERVICE SERVICE PROPERTY.
240 v	1730	370	Lin		1230	3/6	50	19 24 2 1 1 1 1 Car 2 2
8-17	10	1280	32	9-2	17000	372	50	15 - 15 Aller
6-17	7-30	359	40		1230	318	10	
erus cabies rista.	Day	308	40	0-3	11-	370	33	
CARRONNE CO.	1000	378	30	high the later of the	1730	369	60	
RB	630	374	34	9.4	800	3-77	66	网络自己的 医多种性 医二甲基
12-10	10	37/	20	\$100 miles	Inn	7.50	28	
	120	362	44	95	1090	250	42	Sing 1
E STATE OF	10-	377	44	1	13-	355	52	Same and the same
0.10	900	362	30	9-6	1130	357	38	portuta to the
8-19	Jan	358	32	7 2	730	359	50	Hermitis Palacetts, and Artistical
	12	379	2/3	9-7	12	340	25	
8-20	900	374	23	29.70	Mar	341	55	全世界原理。"伊斯斯斯·斯·人—位约)"
A 20	430		40	4-8	11/1	344	40	neo do do lu
	1980	373	36	9-0	1/01	340	36	734 W V 24
8-21	150	369	40	9-9	111	346	20	E TOTAL STATE OF THE STATE OF T
G-H	8430	227	31	9-4	430	240	44	SIND SECURIOR AND AND AND
120/12/20	A and	77F	30	910	720	347	28	
825	CLAN	379	38	170	1.200	330	38	
0-22	Ton	367	27	9-11	15.	330	35	
	lan	376	145	7-"	Idn	332.	35	
8:21	Ran	370	43	9-12	am	- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	V	
1-21	A3D	364	49	- 12	Son	333	40	
8.14	930	363	34	9-13	12		L	Sux20mints service
	704	775	55	1 2 7 3	730	337	32	
8-25	1500	367	50	9-14	430	326	30	
Supplied .	600	767	40	ill personal se	1.70	1	15 (2) (B)	
474	17	380	40	H				NUMBER OF THE PROPERTY OF THE PROPERTY OF

	Spe	cies:	O			5 I I I I I I I I I I I I I I I I I I		RECORD PAG
		21112019		f Bills t Hand Fe				Ident./ Band %n:
<u>Hatch</u>	Date: &	171	Start	Hand Fee	KING DE	rei /	-	Ident./Band #:
Hatch		17/48/9/9	- 14 JAN 19 1	Hand Fee	ding Da	te: _/_	/_	Ident./Band #:
Fornula	Used:	ZOPA	FE M		(20)			
Age Date	Tine	#1 (bnd) Weight	Vol.	#2 (bnd: Weight	Vol Vol	#3 (bnd) Weight	Vol	Comments
8-1	3%	hateli		55558888	22122	25220252		
	10300	11.5	15					
	1230	11.0	15		15年 15年	灵士 "是现	MASSES.	
	400	12.0	15		的政治是	表现数据	P. P. S	William Francisco
990F	La	13	v		200			
/	1500	12.5	N					feliakatika maraja in
18.2	lam	13	r	Wise Edition	100000	医一切处 割帽		是1855年(1870年)
	difficulty.	appl Sec	es					满类的企業主义。 就是
	4 am	13.5	15					
	Zon	14	1.0					
STANLAN LE	105		r		120192			
	100	15	1.0		2100163			
	430	15:4	1.0					JEDEN LIE JEDEN DER SAN
建以类型	730	16	1,0	Was Salling Syl	2000	医红状形态		
AL FOLKS	12	14.50	2.0	可有智度 4. 唯	等 的设置。		de Sax	建筑建筑建筑。
8-3	43000	16	1.5	TRANSPORTER	TAKE !	Heral Val		Charles of the comments of
1	9am	16.5	1.5	四点色谱		5.企理 地區		Park 1000 1000 1000 1000 1000 1000 1000 10
	hot	temo to	n days		15 2	N. E. Marie		在前线的 2000年1月
	1230	17	1.5			WANTE TO THE		
100	430	17 -	2.0		1000			5年5月1日日末年1日14年
THE EN	630	16.5	2.0	THE BUTKE			A Company	
The DA	930	17.5	2.5	11 2 3 1 5 15				THE TRANSPORT OF THE PARTY.
15047014	1230	18.	2.0	12.5	hotel			
8-4	4 am	19.	2.0	12.	65	WHEEL STREET	AST - ES	
	Zam	19.5	2,0	125	.5	Seatment.	of the second	
hotos	1030	20	2.0	13	25	Mary Engl		
WHI.	130	21	2.0	135	5		, a little	Hydron I I I was
4.4	500	20	3.0	14	5			
	830		4	14	15	BETWEEN STREET	THAN	
E. 1219(0)	1/30	23	1.5	14.5	.5	and the second		
6.5	4 am	225	1.5	14	15	到他是	KEET HER	
	730	23	30	15	05		Hay III SAY	
1 (A)	2030	25	2.0	16	05	The state of the	Marie Mil	
· desire.	2.30	24.3	3.0	15.5	1.5	1700 P		建工作的
	6m	26	2.0	16	1.0			
	980	24.5	2.5	16	15			
100	1230	28	2.0	16.5	15	1000		CONTRACTOR OF THE STREET
8-6	Sam	17.5	3.0	17	2.0	THE RESERVE		tomes 25-96° F.
	530	29	3.0	1/2	2.5	C 4 (0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		1.

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PEDIATRIC RECORD

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Species: anu g

Cage B3W1

Patch Date: 1 125, 2220 Start Hand Feeding Date: _____ | Ident/ Band #: ____

Hatch Date: ___/__ | Start Hand Feeding Date: ___/_ | Ident./ Band #: ___

Hatch Date: ___/_ / Start Hand Feeding Date: ___/_ / Ident./ Band #: ____

Age -	Age		#1 (bnd #)		#2 (bnd #)		#	Comments,	
Date	Time	Weight	Vol	Weight	Vol	Weight	Vol	Comments	
2-24	9am		+950	3-4	734	368	32		
	10 dm	278	20		12-	378	30		
4 3	6m	277	26		730	370	30		
	11/m	289	31		1230	380	32		
2.25	Tan	289	28	3-5	700	379	33		
	1 m	295	31		6 m	363	40	more supply and the s	
	6.m	305	25		12-	379	32	aut of 1 60x	
- Undian	130	-	·	3-6	10 ans	365	35	into brader floor	
2-26	800	3/0	26		4 m	374	43	930 proster temp	
100	2m	307	33	CONTRACTOR OF THE SECOND	4 pm	375	33		
P. Vine	730	319	32	3-7	800	376	30		
	12		4	am tra	3m	37/	40		
2-27	730	322	30		1/04	377	40		
	/30	316	34	3-8	730	367	33	920	
30	630	328	31	进行情	330	367	40		
	11/1	335	27	Maria III	130	311	40		
2-28	7sm	329	30	3-9	800	375	31		
	1230	320	31		130	375	30		
	Zm	325	30	are the	730	372	35		
E.	7130	344	31		19M	380	40		
-29	Tom	336	30	3-10	730	383	38		
	100	397	30		130	382	40		
	Married Spinish and Spinish an	348	35		8 m	382	40		
- 1	1130	300	30	Teres.	8 pm	395	40		
3-1	Tans	354	36.	3-11	730	388	40		
	3 pm	346	25		1230	390	42	8	
- Mary	730	358	28		830	379			
	1230	368	36		12-	402	37 30		
3-2	730	360	30	3-12	630	392	35		
		359	10	44. 46	1/30	298	38		
	3 pm	266	30		130	388	40		
54-35	1230	366 380	30		12	407	30		
3-3	800	365	30 40 30	3-13	800 2m 830	387	48		
A	45	364	40	17/41%	2m	394	40		
250	1230	371	30		830	307	.33	- 130018	
	FIRESTA	W. SEA IR	SOMETHING I		12-	395	44	THE THE TOWNS OF	

	4 Th	~ ~	
PEDI	0 1 20	. 20	

Species: CITRON COCK 4700

Page __/

latch Date:	6,12,2020	Start Hand Feeding Date:	 Ident/ Band #:	
latch Date:		Start Hand Feeding Date:	 Ident./ Band #:	
latch Date:		Start Hand Feeding Date:	 Ident./ Band #:	

Formula Used:

Age	Time	#1 (bnd #)		#2 (bnd #)		#3 (bnd #)		Comments	
Date		Weight	Vol	Weight	Vol	Weight	Vol		
6-12	315	natch	-						
	1030	12	/			,			
	100	13	15	West and the second					
	430	125	1						
	730	13	15						
	9	-	V						
	1030	13.5	.5						
6-13	2/5	13.	1.5		1				
	500	135	1.0						
T Turk	730	13,5		The same					
	10	14	1,0						
Name of the last	12	14	1.0						
	Andrew Land	14,5	1.5			1 10			
	2 pm 430	15	1.0				71		
	700	16	1,0						
	930	16	1.0	100					
6-14	12-	16	1.0						
	330	165	1.0	hoth	27an				
Ø-17	700	16,	1,0	12	@/BW				
Y. H.	930	16	1.0					2 37	
	12	17	1.5		-			- AL 1 - W	
		17	1,5	11	15			(5.2.3.2.2.2.2.2.2.2.2.2.2.2.2.2.2.2.2.2.	
-	3 m	18	1.0	11.5	, 5			100	
	812 m				.5			V 2002	
-	1030	18	1.5	11.5	1				
	1230	- 1,83							
1 -	1230	105	1.0	10	4			SE ON OUR	
6-15	~15	19.5	1.0	12	,5				
	75			12.5					
	10	20	1,5	12.5	15			No. of the second secon	
	12	20,5	1.5	7-		(1000)			
	130	21.	1,5	13	-	1 7			
	Boun	22	~	13	V			1	
	800	22	2,	13,5	v				
Ver	10-	22.00	€ 168	14e	15				
18.00	1 am	22,5	= 140	14	18		A STATE		

PEDIATRIC RECORD

Species: Macaw

Page ___

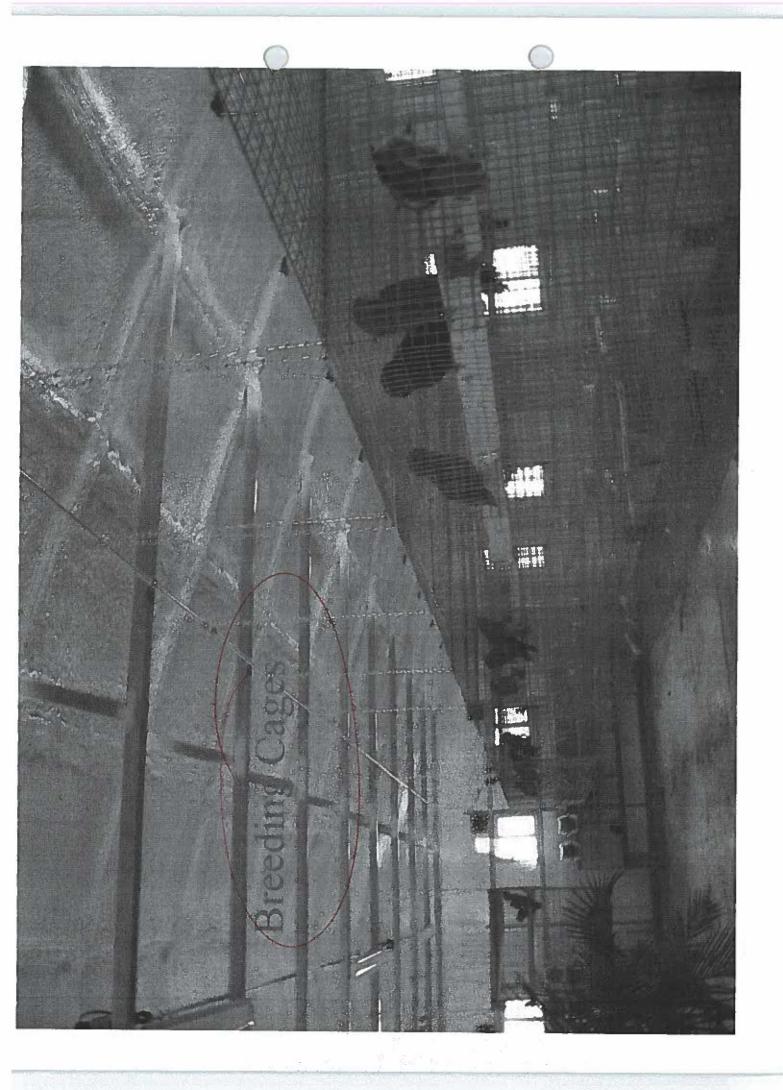
Hatch Date:	81/812020	Start Hand Feeding Date:		Ident./ Band #:
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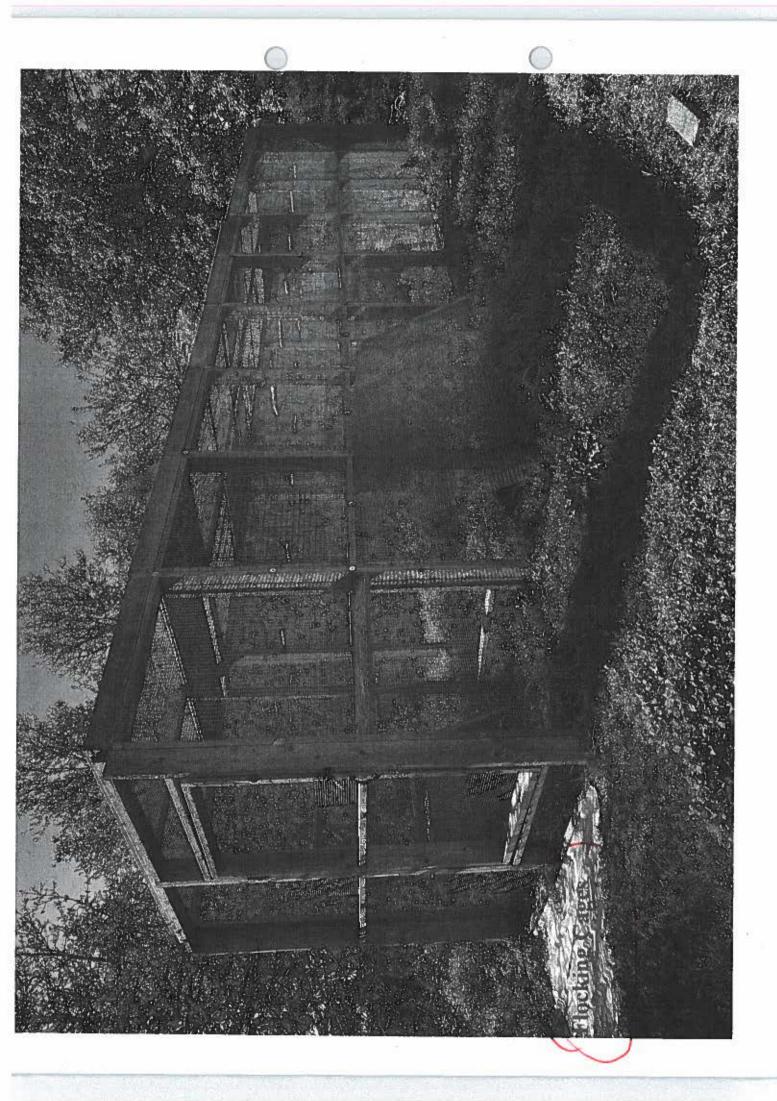
Hatch Date: 8 119 12020 Start Hand Feeding Date: ___/___ | Ident/ Band #: ____

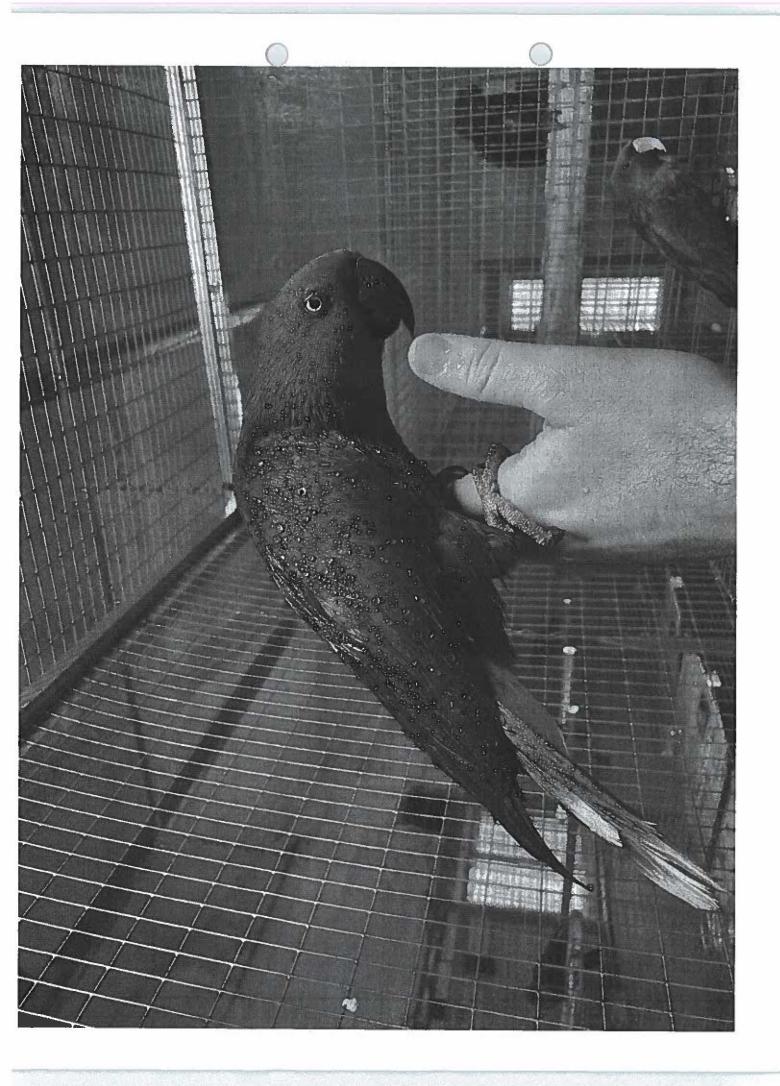
Hatch Date: __/_/ Start Hand Feeding Date: __/_/ Ident./ Band #: ___

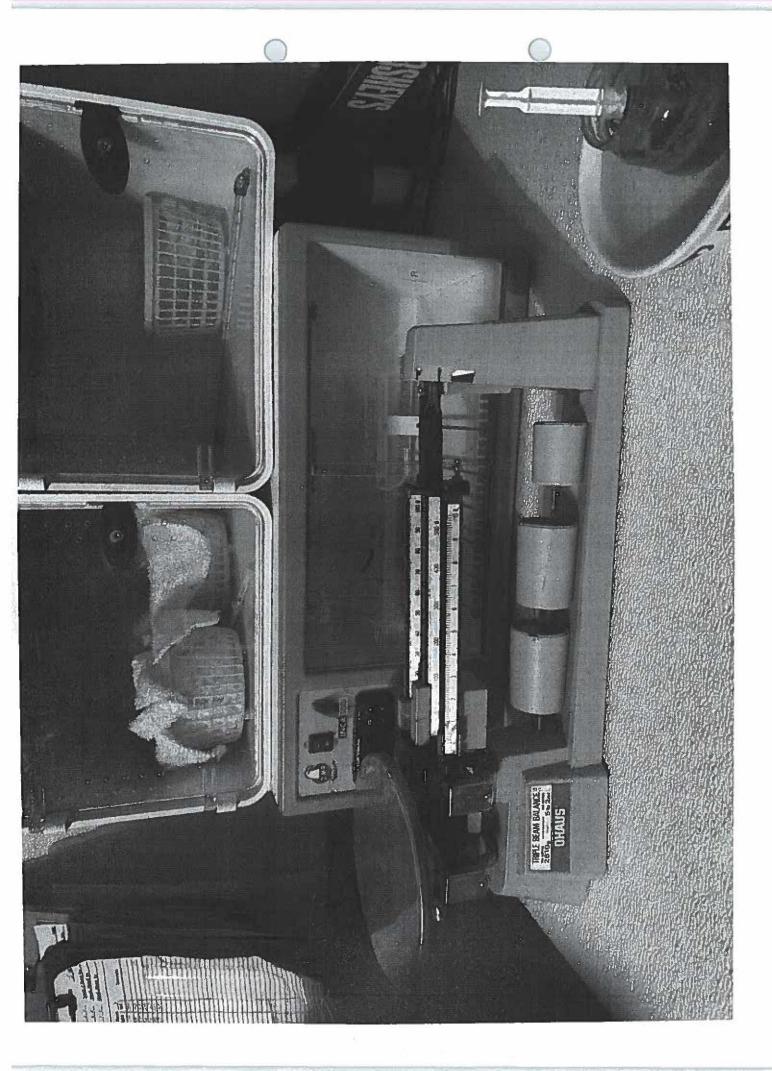
Formula Used: Pritte eyes hand feeding new batch

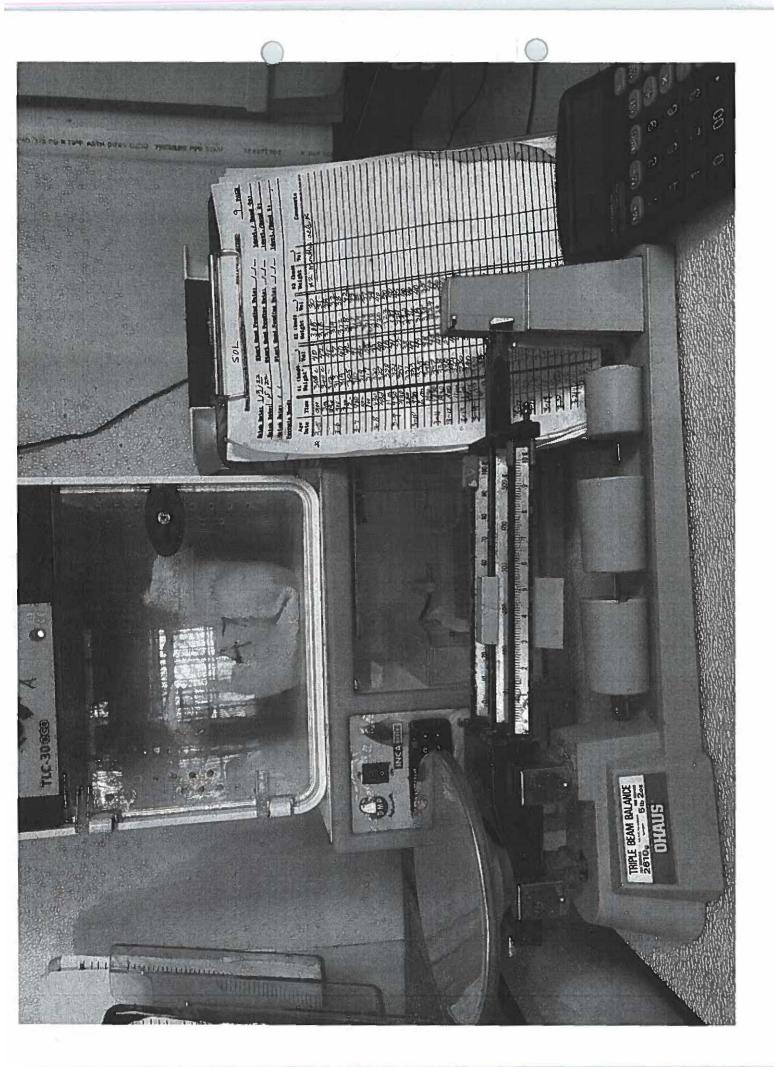
Age Date	Time	#1 (bnd #)		#2 (bnd #)		#3 (bnd #)		Comments
		Weight	Vol	Weight	Vol	Weight	Vol	- Commonts
3-18	4	hatel						
990	800	24	V					
	1045	24	~					
	130	25.5	V					
	330	25.5	~					
	545	26.5	-					
	8 45	27	1	, G				
	1120	27.	1.0	1,11				
8-19	300	27.5	v			177	-14	
	500	27	1.0					
	730	27,5	1.5					
	10	28	1.0					
The second	12	28	1.5	72,71				
	2 Ph	29	15	23.5	hatch			photo / First Feces/Mocou
	430	29.5	1.0		-			
W. HERRY	130	29.5	1,5	21.5	V			
	830	30	4	22	L			
Ľ	1030	30,5		22.5	V			
***	1730		W	23 40	v		Vanie	
9-20	400	3/he	L	23 he.	V		Frage As	
Till Value	730	31.5	V	24	v			
780 F	1130	32	V	245	1			
	330	33	Lir	24		7 00		
	1630	34	20	24	2.0			
Let of	900	34 35	V	25,5	v			
	100	35		25.	-			
8-21	540	35	V	25,5	V			
	800	370	2.0	25,5	L			
S Barrer	11-	37.5e	V	26ne	L	3 F 84	The State of	- CARLON CONTRACTOR
	2m	39.5e	2,5	25,5v	e V	mate		
	500	40	3.0	15,5€	2.0		7 =	Babies sleep ofter feeder
	5300	42 ne	V	26 €	~			7 1
	12-	43 e	3.0	26.50	3.0	1		
3.22	330	44	v	28.5	V			El stand up mon
	700		3,0	30	i/			130000000000000000000000000000000000000
harrage.	1030	46.5	3.5	31	V			

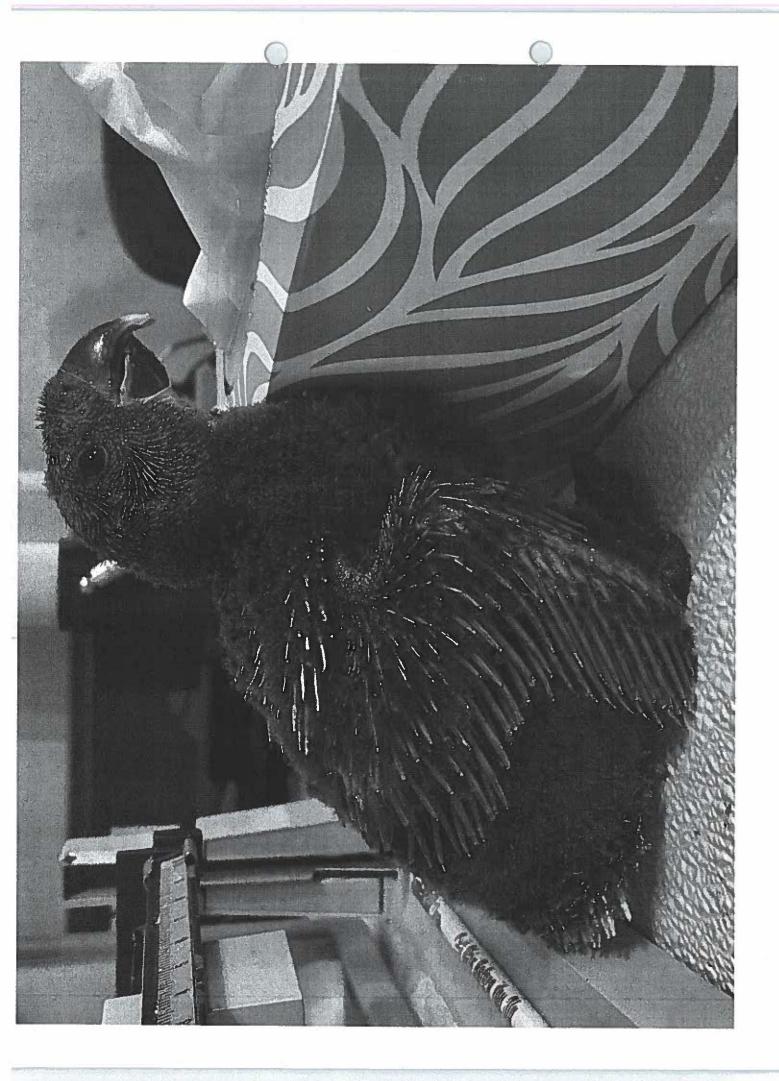




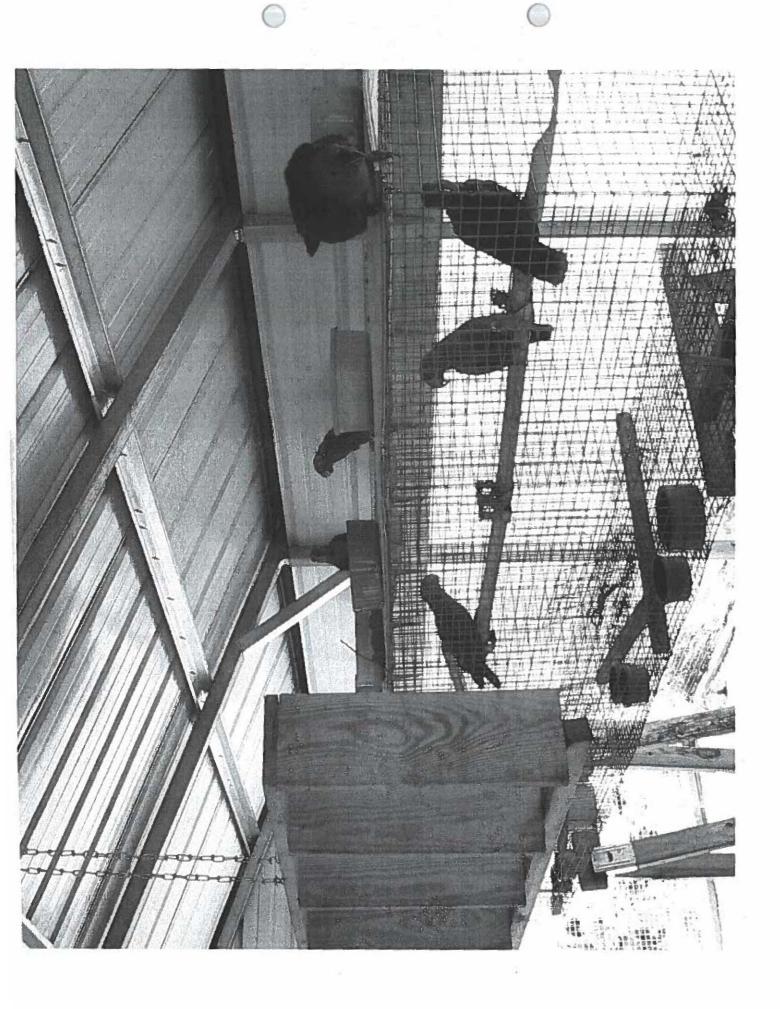


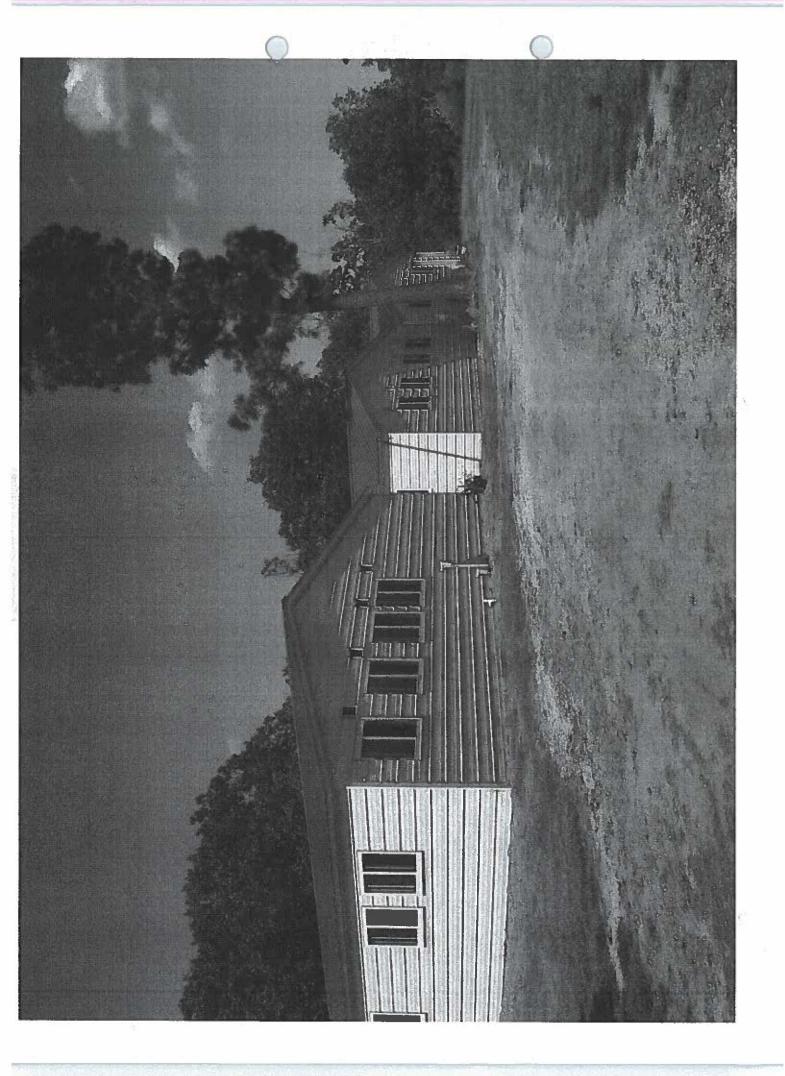


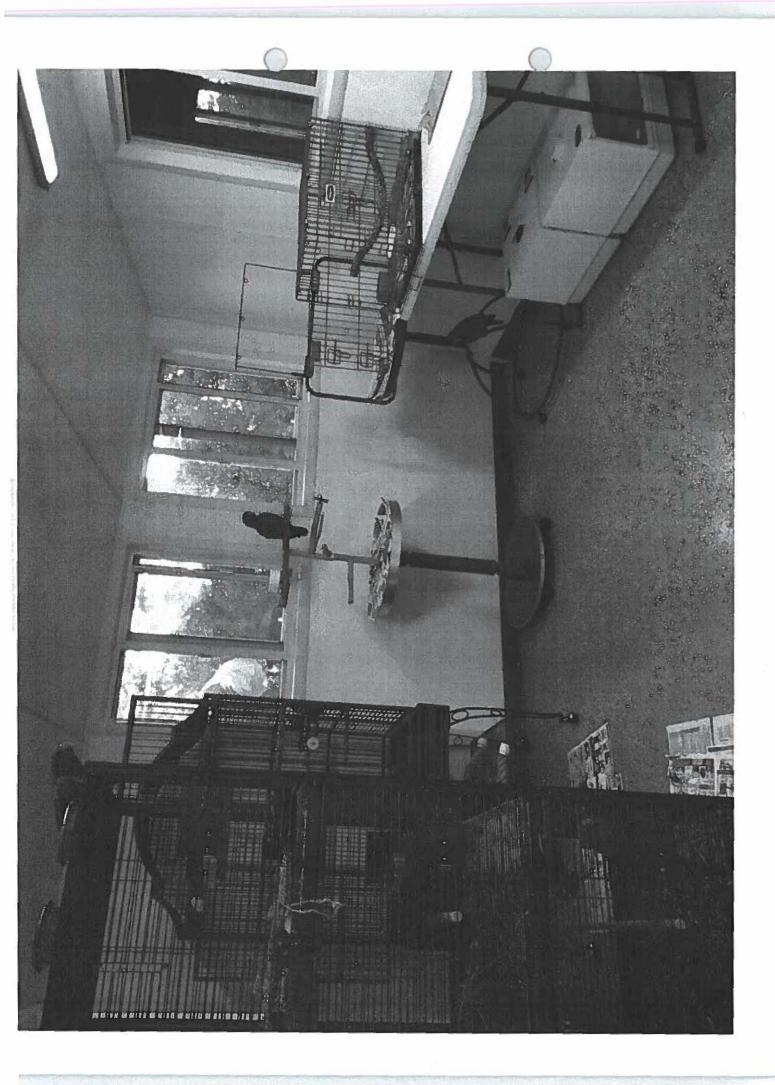














Organization of Professional Aviculturists

May 4, 2022

RE: Proposed CBP Oversight

To whom it may concern:

The OPA has agreed to oversee the activities of the Cooperative Breeding Program for captive bred, Eclectus parrot (*Eclectus roratus*) proposed by its members, Gerald Bobak and Laurella Desborough.

The OPA consist of individuals in the United States and internationally who professionally raise, care for, and reproduce avian species in manners which are sustainable, humane, and beneficial to the long-term survival of the species. The goal of the OPA is promote sustainable and beneficial aviculture in the U.S. and worldwide, in all its forms. Members of the OPA have previously attended the meeting of the CITES as members of the U.S. delegation. Our Board of Directors consist of Steve Duncan (President), Jean Pattison (Vice President), Roland Cristo, Caroline Efstathion, John Aynes, Alycia Antheunisse, Haniman Boniran. Some of our distinguished membership includes Mauricio Herrera and Prof. Dr. Luís Fábio Silveira.

The OPA is currently the oversight organization for CB043 and CB044. The OPA prides itself on bringing together some of the brightest minds in U.S. aviculture. The OPA has also regularly sent delegates to the CITES meetings prior to the COVID-19 pandemic and its members are well aware about the difficulties species are facing worldwide due to climate change and human development

The OPA accepts as members all individuals who are dedicated to the promotion and growth of aviculture in the U.S. and worldwide. All OPA board members however, must be active or retired aviculturists.

Once a CBP is populated, we expect the CBP members to yearly report to the OPA board all successes and failures. If there are concerns as to the operation of the CBP, the OPA will take active steps to investigate and ensure that all activities conform with best avicultural practices.

The OPA will provide expertise and guidance from its professional membership as requested and/or needed.

The OPA believes that *in situ* conservation requires a healthy and genetically viable captive population that can provide a ready-made source of genetic material and knowledge that can be tapped into as need

As requested by Form 3-200-49, the OPA states as follows:

- 1) All members of the CBP must be professional OPA members in good standing that have agreed to comply with professional avicultural standards. All potential future CBP members would need to demonstrate their benefit to achieving the goals of the CBP. Gerald Bobak and Laurella Desborough are OPA members in good standing.
- 2) The CBP will be monitored directly by the OPA Board. This oversight will include a yearly report presented to OPA members for review. The OPA intends to ensure that CBP achieves it goals and will assist in promoting the CBP.
- 3) The OPA will, in conformity with all applicable USFWS regulations, approve all distributions of surplus offspring from the CBP. Priority will be given first, to other CBPs and second, to qualified breeders and zoos in the United States that have been vetted by the OPA and demonstrated their intent to uses the offspring for breeding purpose in conformation with the interests and goals of the CBP. The OPA will ensure that steps are taken to document and register the population of specimens produced by the CBP and to ensure that the genetics and management of the population are such and that the U.S. captive population is self-sustaining.

Thank you for your consideration,

/s/ Steve Duncan

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