



RCVD SEP 24 2019

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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

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

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

Section A: Complete if applying as an individual

1.a. Last Name Blakley	1.b. First Name Ryan	1.c. Middle Name/Initial K.	1.d. Suffix
2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address

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

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title		6. 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

Street address; Apartment #, Suite #, or Room #; no P.O. Boxes				
1.b. City Lubbock	1.c. State TX	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country Lubbock
2.a. Mailing address (include if different than physical address; include name of contact person if applicable) Same				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the nonrefundable application processing fee in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount identified on page 6 and 7. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – <i>attach documentation of fee exempt status as outlined in instructions</i> [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50 Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50 , and I certify that the information submitted in this application for a permit is complete and true to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
09-01-2019
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)
Please continue to next page

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

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

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

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

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

Same

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

Ryan Blakley, [REDACTED]

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

☒ No ☐ Yes

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

4. **Permit number.** Enter the permit number to be reissued/renewed/amended.

Prt#: MA27473B-0

5. Submit the original permit with this application.

6. Past activities.

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

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

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

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

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

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

Permittee's signature:  Date: 09-01-19

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

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

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

Permittee's signature: _____ Date: _____

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



DEPARTMENT OF THE INTERIOR
U.S. FISH AND WILDLIFE SERVICE

FEDERAL FISH AND WILDLIFE PERMIT

1. PERMITTEE

RYAN K. BLAKLEY

LUBBOCK, TX

U.S.A.

2. AUTHORITY-STATUTES

16 USC 1533 (d)

16 USC 1539 (a)

REGULATIONS

50 CFR 17.21 (g)

3. NUMBER

MA27473B-0

4. RENEWABLE

☒ YES
☐ NO

5. MAY COPY

☒ YES
☐ NO

6. EFFECTIVE

11/17/2014

7. EXPIRES

11/17/2019

8. NAME AND TITLE OF PRINCIPAL OFFICER. (If #1 is a business)

9. TYPE OF PERMIT

CAPTIVE-BRED WILDLIFE REGISTRATION

10. LOCATION WHERE AUTHORIZED ACTIVITY MAY BE CONDUCTED
WITHIN THE UNITED STATES

11. CONDITIONS AND AUTHORIZATIONS:

A. GENERAL CONDITIONS SET OUT IN SUBPART D OF 50 CFR 13, AND SPECIFIC CONDITIONS CONTAINED IN FEDERAL REGULATIONS CITED IN BLOCK #2 ABOVE, ARE HEREBY MADE A PART OF THIS PERMIT. ALL ACTIVITIES AUTHORIZED HEREIN MUST BE CARRIED OUT IN ACCORD WITH AND FOR THE PURPOSES DESCRIBED IN THE APPLICATION SUBMITTED. CONTINUED VALIDITY, OR RENEWAL, OF THIS PERMIT IS SUBJECT TO COMPLETE AND TIMELY COMPLIANCE WITH ALL APPLICABLE CONDITIONS, INCLUDING THE FILING OF ALL REQUIRED INFORMATION AND REPORTS.

B. THE VALIDITY OF THIS PERMIT IS ALSO CONDITIONED UPON STRICT OBSERVANCE OF ALL APPLICABLE FOREIGN, STATE, LOCAL, TRIBAL, OR OTHER FEDERAL LAW.

C. VALID FOR USE BY PERMITTEE NAMED ABOVE.

D. Acceptance of this permit serves as evidence that the permittee is registered under 50 CFR 17.21(g), and that the permittee understands and agrees to abide by the special Conditions for Captive-bred Wildlife Registration as specified by the Division of Management Authority (copy enclosed).

E. Authorized to take for normal husbandry practices; deliver, receive, carry, transport or ship in interstate commerce, for the purpose of enhancement of propagation, any Galapagos tortoise (*Chelonoidis nigra*), Radiated tortoise (*Astrochelys radiata*), Yellow-spotted side-necked turtle (*Podocnemis unifilis*), Nile crocodile (*Crocodylus niloticus*), Yacare caiman (*Caiman yacare*), Ring-tailed lemur (*Lemur catta*), Black-and white ruffed lemur (*Varecia variegata*), Red ruffed lemur (*Varecia rubra*), Cotton-headed tamarin (*Saguinus Oedipus*) that is bred in captivity in the United States.

☒ ADDITIONAL CONDITIONS AND AUTHORIZATIONS ALSO APPLY

12. REPORTING REQUIREMENTS

ANNUAL REPORT DUE: 03/31

SEE "SPECIAL CONDITIONS FOR CAPTIVE-BRED WILDLIFE REGISTRATIONS"

SUBMIT ANNUAL REPORT TO PERMITS@FWS.GOV (REFERENCE THE PRT NO. IN SUBJECT LINE)

ISSUED BY

TITLE

CHIEF, BRANCH OF PERMITS, DMA

DATE

11/17/2014

(3-4-20)

RCUD MAR 23 2020

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

Dear Sir or Madam,

Ryan Blakley possesses a CBW, MA27473B0, allowing us to purchase certain listed endangered species in interstate commerce. Please find the information below as a summary for the past calendar year, 2019.

1. Number of CBW species born in 2019 and survived for 30 days or longer.

1 ringtail lemur DOB 3-19-19

2. Number of CBW species that died in 2019 and why.

None

3. Number of CBW species sold in 2019 and the recipients' CBW #.

#/Species	Sold to
2 Galápagos tortoise	Brandon Hise [REDACTED] Lubbock, TX [REDACTED] (in state Sale)
1 Galápagos tortoise	Blake Pullin [REDACTED] Austin, TX [REDACTED] (in state Sale)
8 Galápagos tortoise	David Spicer [REDACTED] Plano, TX [REDACTED] (in state Sale)

4. Number of CBW species purchased in 2019 and the source's CBW#.

#/Species	
16 Galápagos tortoise	John Heidecker [REDACTED] Jacksonville FL [REDACTED] CBW # MA103836-0
3 Radiated tortoise	John Heidecker [REDACTED] Jacksonville FL [REDACTED] CBW # MA103836-0

5. Number of CBW species acquired through other means (loan, trade, donation) and from whom.

NONE

6. Number of CBW species transferred to others by loan, trade and donation and to whom.

NONE

7. My current inventory of Endangered and Threatened species as of 1.1.2020 is:

Species	qt on hand
Geochelone nigra	7
Lemur catta	5
Astrochelys radiata	3

Sincerely,

[REDACTED]

Name

3-4-20

Date

Re: [EXTERNAL] PRT-27473B

Nelson, Emma G <emma_nelson@fws.gov>

Mon 7/27/2020 8:27 AM

To: Ryan Blakley [REDACTED]

Good morning Mr. Blakley,

Thank you for providing this information. I will move forward with processing your request.

Best,
Emma

From: Ryan Blakley [REDACTED]

Sent: Friday, July 24, 2020 1:54 PM

To: Nelson, Emma G <emma_nelson@fws.gov>

Subject: Re: [EXTERNAL] PRT-27473B

Emma,

The attached file contains the documentation and information requested. Please let me know if you need anything further to facilitate renewal.

Thanks,
Ryan Blakley

On Jul 21, 2020, at 11:39 AM, Nelson, Emma G <emma_nelson@fws.gov> wrote:

Good afternoon Mr. Blakley,

Thank you for your email. Based on the delay from USDA, please provide documentation to show the 90-120 day delay with USDA along with your response to the first point in my initial email (regarding how you are maintaining a genetically viable population/or your participation in an established breeding program for each species) by the end of this week, Friday, July 24.

Please provide the information and documentation indicated. **Any response must be in written form (email is considered written form).**

If we do not receive the information requested above by **Friday, July 24**, your application will be abandoned and administratively closed. Once the file is closed, you would need to submit a new application and all required fees. If you have questions, you may contact me at Emma_Nelson@fws.gov or at 703-358-2296. Please reference your file number, **PRT-27473B**.

Thank you,
Emma

From: Ryan Blakley <[REDACTED]>

Sent: Friday, July 17, 2020 10:05 AM

To: Nelson, Emma G <emma_nelson@fws.gov>

Subject: Re: [EXTERNAL] PRT-27473B

Good morning Emma,

As of this morning I still have not received my USDA permit. In my communications with the IRS, USDA, and US Department of state concerning a passport, each agency has advised a 90-120 day delay. On that basis I requested a 90 day extension. Can you grant a further extension?

Thank you,
Ryan Blakley

On Jul 8, 2020, at 8:44 AM, Nelson, Emma G <emma_nelson@fws.gov> wrote:

Good morning Mr. Blakley,

Thank you for your email. Based on your request, we can grant an extension to provide the requested additional information for 30 days from your request. Therefore, the requested information will need to be provided by Monday, July 20th.

Thank you,
Emma

From: Ryan Blakley [REDACTED] >

Sent: Friday, June 19, 2020 3:08 PM

To: Nelson, Emma G <emma_nelson@fws.gov>

Subject: [EXTERNAL] PRT-27473B

Emma,

I hope this email finds you well. I am writing to request a 90 day extension. I have been waiting on my renewed USDA certificate so I can submit the responses you have requested. Although I filed my paper work and paid my USDA renewal fee in a timely matter, I have not received my renewal. I checked with my Inspector, and she verified that everything was in order, she did tell me with the Covid fiasco, everything was taking longer than normal.

I do not want to be a headache for you, but I cannot supply documents the USDA has not supplied to me.

Furthermore, I am worried that file will be administratively closed through no fault of mine.

Thank you,
Ryan Blakley

On May 6, 2020, at 1:13 PM, Nelson, Emma G <emma_nelson@fws.gov> wrote:

Dear Mr. Blakley,

We received your application for to renew your registration under the Captive-bred Wildlife (CBW) program for radiated tortoise (*Geochelone radiata*), Galapagos tortoise (*Geochelone nigra*), yellow-spotted side-necked turtle (*Podocnemis unifilis*), Nile crocodile (*Crocodylus niloticus*), yacare caiman (*Caiman yacare*), ring-tailed lemur (*Lemur catta*), black-and-white ruffed lemur (*Varecia variegata*), red ruffed lemur (*Varecia rubra*), and cotton-headed tamarin (*Saguinus oedipus*). The processing of your application cannot be completed because:

- In reviewing your renewal application, we also review the initial application from which we authorized this CBW permit. In that review, we may have questions about the information that was originally provided. In this case, I am seeking further information to demonstrate how you are maintaining a genetically viable population and/or your participation in an established cooperative breeding program (Studbook participation, although beneficial, is not an established breeding program).
- Please provide a copy of your current USDA AWA license.

Please provide the information and documentation indicated. **Any response must be in written form (email is considered written form).**

If we do not receive the information requested above within **45 days** from the date of this e-mail, your application will be abandoned and administratively closed. Once the file is closed, you would need to submit a new application and all required fees. If you have questions, you may contact me at Emma_Nelson@fws.gov or at 703-358-2296. Please reference your file number, **PRT-27473B**.

Best,
Emma

Emma,

Thank you for allowing me the extra few days to address the question, and delay issue. As evidenced by the IRS and State department's websites, as well as numerous media articles, there reference reduced services and delays. I have included documentation and cited sources below.

<https://www.irs.gov/newsroom/payment-deadline-extended-to-july-15-2020>

Filing and Payment Deadline Extended to July 15, 2020 - Updated Statement

March 21, 2020 - The Treasury Department and the Internal Revenue Service are providing special payment relief to individuals and businesses in response to the COVID-19 Outbreak.

General Information

<https://travel.state.gov/content/travel/en/passports.html>

July 13, 2020

To prevent the spread of COVID-19 and protect our workforce and customers, we significantly reduced passport operations in March 2020. We temporarily suspended expedited passport processing and restricted service to cases involving life-or-death emergencies. As global conditions evolve and U.S. states begin to reopen, we are resuming operations in phases. We ask for your patience as we safely work on your application.

[www.politico.com](#) › story › 2019/09/24 › usda-expects...

Sep 24, 2019 - **USDA** expects 'significant **delays**' in economic research reports. ... **USDA** identified 38 specific reports that may be **delayed** because staff members have departed. They include research on topics such as consolidation in the dairy industry, food security among veterans, and international agricultural market access.

[www.agweb.com](#) › article › usda-delays-enforcement-cou...

Apr 16, 2020 - The **USDA's** Agricultural Marketing Service is "exercising enforcement discretion" for COOL requirements, which cover fresh and frozen produce, ...

[nvestigatemidwest.org](#) › 2020/02/12 › relocating-usda-...

Feb 12, 2020 - Relocating **USDA** agencies **delayed** millions in grants. One was for a suicide prevention network for farmers. By Sky Chadde/Gannett Ag Data ...

[mceachin.house.gov](#) › media › press-releases › mceachi...

May 12, 2020 - McEachin, Adams Lead Bipartisan Letter Urging **USDA** to Release **Delayed** Funding for Land-Grant HBCUs During the COVID-19 Pandemic.

USDA delays federal oversight of labs testing for THC

[hemptoday.net](#) › us-lab-oversight

Mar 4, 2020 - The **USDA** said it now has a better understanding of how the limited number of DEA-registered labs will hinder testing, creating value chain ...

The USDA's website states they are providing timely service and does not acknowledge any delays. From the Sources Cited, it is reasonable to believe they were behind prior to pandemic and now the situation is exacerbated. The fact that the USDA did not send renewal packets this year is a further indication. I have spent a fair amount of time trying to get personal communications put on paper, but was unsuccessful. After that contact I was sent an Electronic renewal via email but have not received it in the mail. That communication is included.

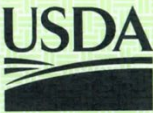
On Jul 21, 2020, at 7:47 PM, Patton, Lindsay M - APHIS <Lindsay.Patton@usda.gov> wrote:

Hello Ryan,
Please see the attached for a copy of your renewed license. The hard copy will be sent via mail. ☺

Thank You
Have a Great Day!

Lindsay Patton
Inspection Licensing Assistant
970-494-7478

USDA-APHIS-AC
2150 Centre Ave.
Building B, 3W11
Fort Collins, CO 80526
fax:970-494-7461



**United States
Department of
Agriculture**

Marketing and
Regulatory
Programs

Animal and
Plant Health
Inspection
Service

Animal Care

EXPIRATION DATE: JUNE 11, 2021

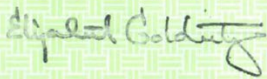
This is to certify that RYAN BLAKLEY

is a licensed CLASS B DEALER
under the

Animal Welfare Act
(7 U.S.C. 2131 et seq.)

Certificate No. 74-B-0348

Customer No. 7373



Deputy Administrator

APHIS FORM 7007 (NOV 1999) Previous editions are obsolete.

In response to the possible question of

- In reviewing your renewal application, we also review the initial application from which we authorized this CBW permit. In that review, we may have questions about the information that was originally provided. In this case, I am seeking further information to demonstrate how you are maintaining a genetically viable population and/or your participation in an established cooperative breeding program (Studbook participation, although beneficial, is not an established breeding program).

To maintain genetic viability we utilize several methods

1. Utilize permit to acquire as genetically diverse founders from multiple bloodlines.
2. Track bloodlines with paperwork from date and source of acquisition.
3. Use a color coded system to track individuals.
4. Place siblings with people and facilities to ensure enough animals are available.
5. Scope animals at early age to ensure proper sex ratios
6. Place transponders (once animals are large enough to do so safely) to ensure animals are easily identified in subsequent years
7. Follow guidelines established by reputable institutions, conservation groups and government organizations.

In the event you need further documentation, I can provide recommendation letters from facilities I have animals on loan to and from, veterinarians, and conservation groups, and other CBW permit holders.

Thank you for your time and consideration,

Ryan Blakley