

April 24, 2019

Permits Section
Los Angeles Department of Animal Services
ani.permit@lacity.org

Via electronic submission

Re: Steven Martin Unpermitted Animal Act at 10979 Chalon Road

Dear Permits Section,

I am writing on behalf of PETA and its more than 6.5 million members and supporters worldwide to request that the Los Angeles Department of Animal Services (LAAS) investigate Steve Martin dba Steve Martin's Working Wildlife, Dan Bilzerian, and Ignite International, LTD for apparent violations of Los Angeles Municipal Code (LAMC) §§ 53.50(a) and 53.38 by exhibiting an adult Kodiak bear named Tag at a private party in Los Angeles, California without a permit.

On April 20, 2019, Dan Bilzerian [reportedly](#) held a party at 10979 Chalon Road, Los Angeles, California 90077—an address registered to Ignite International, LTD, a company with which Bilzerian is associated (Ex. A, Ignite business documents). According to an [Instagram post by Jay Tabiza](#), a bear named [Tag](#) was exhibited at this party. *See* Video 1; Ex. B (screen shot of Tabiza post showing “tag.thebear” tagged in the post). Tag is a Kodiak bear [owned and exhibited by Steve Martin](#). *See also* Ex. C (Steve Martin California Department of Fish and Wildlife Restricted Species Permit, listing Tag in the inventory of animals). Photographs and videos of Tag at this party show him in direct contact with and in close proximity to the public. *See* Video 2 (Bilzerian feeding Tag, also available [here](#)); Ex. D (Tag sitting within a few feet of a crowd of women, also available [here](#)); Ex. E (Tag trying to catch a cookie from a guest's mouth, and standing within a few feet of a crowd of women, also available [here](#)).

The LAMC requires a permit for any animal act or exhibit held within the City of Los Angeles. LAMC § 53.50(a) (“No person, without first obtaining a permit . . . shall keep, conduct or operate within the City of Los Angeles any . . . animal acts or exhibitions. . .”); *see also id.* § 53.38 (“No person shall have, keep or maintain any wild, exotic, dangerous or non-domestic animal or reptile without first applying to and receiving from the Department a permit so to do.”). On April 23, 2019, PETA confirmed with the Permits Section that no permit was issued for an animal exhibit for the recent party at 10979 Chalon Road.

Nor could a permit lawfully be issued for the exhibition of a bear at this location. An animal exhibition permit for a wild, exotic, or dangerous animal cannot be issued if “the keeping or maintenance of such animals [does not] conform to the zoning regulations set forth in Article 2, Chapter I of this Code.” LAMC § 53.38;

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see also id. § 53.50(c)(1) (a permit can only be issued if “[t]he keeping of animals, or the conduct or operation of the business for which the permit is requested, and at the place set forth in the application, will not violate any law or ordinance of this City, or any law of the State of California.”). The LAMC allows certain wild animals to be kept as an “accessory use” pursuant to an appropriate permit issued by Animals Service but specifically prohibits bears. LAMC § 12.03 (“An accessory use shall also include . . . the keeping of wild animals, under an appropriate permit issued by the Department of Animal Services as provided for in Section 53.38 of the Code, but in no event including the following wild animals: bear . . .”).

Bears are inherently dangerous wild animals and [captive bears](#) have caused at least 6 documented deaths and over 60 documented human injuries in the United States since 1990. According to wildlife veterinarian Dr. Christine Capaldo, Kodiak bears have long, sharp claws and powerful shoulder muscles used for digging. They are inherently dangerous and can swipe without warning inflicting disfiguring wounds often to the face, scalp and upper body leading to hemorrhage, infection, and death. The photographs and videos from Bilzerian’s April 20th party show Tag dangerously close to and in direct contact with guests. The conditions under which Steve Martin exhibited Tag at this party were extremely dangerous and unlawful. As a result, PETA urges Animal Services to pursue any and all available penalties for this unlawful animal exhibition.

I would welcome the opportunity to discuss this matter with you at your earliest convenience and look forward to hearing from you.

Very truly yours,



Michelle Sinnott
Counsel, Captive Animal Law Enforcement

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