

September 10, 2019

Robert Gibbens, D.V.M.
Director, Animal Welfare Operations
USDA/APHIS/Animal Care

Via e-mail: [REDACTED]; animalcare@usda.gov

Re: Request to Investigate Terranova Enterprises for Unlicensed Exhibition

Dear Dr. Gibbens:

I am writing on behalf of PETA to request that the USDA investigate Douglas Terranova, dba Terranova Enterprises, Inc., for apparent unlawful exhibition of animals in violation of the Animal Welfare Act (AWA).

On Friday, August 30, Terranova's AWA license (74-C-0199) was revoked.¹ Despite this revocation, Terranova was documented exhibiting tigers on August 31 and September 1 at the Ben Hur Shrine Circus, produced by Carden Circus International, in Cedar Creek, Texas. (*See* Exhibits 1 and 2.) The circus held three performances on Saturday and two performances on Sunday. (*See* Exhibit 3.)

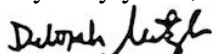
The AWA expressly prohibits this unlawful exhibition under 9 C.F.R. § 2.10(c), which states that "[a]ny person whose license has been suspended or revoked shall not buy, sell, transport, exhibit, or deliver for transportation, any animal during the period of suspension or revocation." Terranova's continued involvement in the exhibition of animals is also in apparent violation of 7 U.S.C. § 2134.

In the judicial officer's August 30 decision, Terranova was ordered to cease and desist from violations of the AWA and its regulations and standards. He and his company had *already* proven to disobey a previous cease and desist order,² and as a result were assessed a civil penalty totaling \$29,700.

Because the USDA took the ultimate action of revoking Terranova's license, there are no circumstances under which it is lawful for him to continue engaging in AWA-regulated activity. In light of Terranova's history of flagrant disregard of the law, PETA requests that the USDA pursue enforcement action—including criminal charges—without delay.

Thank you for your attention to this important matter. Please inform me of the complaint number that you assign to this correspondence.

Very truly yours,



Deborah Metzler, M.S.
Associate Director of Captive Animal Law Enforcement

¹In re: Douglas Keith Terranova, an individual; and Terranova Enterprises, Inc., a Texas corporation, AWA Docket Nos. 15-0058, 15-0059, 16-0037, and 16-0038 (Aug. 30, 2019).

²In re: Terranova Enterprises, Inc., et al., AWA Docket Nos. 09-0155 and 10-0418 (Dec. 20, 2011).

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