

October 2, 2020

Robert Gibbens, DVM
 Director, Animal Welfare Operations
 USDA/APHIS/Animal Care

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

Re: Request for Investigation of Michael Todd for Apparent Illegal Exhibition

Dear Dr. Gibbens,

I am writing on behalf of PETA to request that the USDA urgently investigate Michael Todd, dba “All Things Wild” aka “White Tiger Discovery” for his apparent illegal exhibition of tigers, in violation of the Animal Welfare Act (AWA).

On September 18, Todd’s AWA license (license no. 33-C-0388) was terminated by consent decree, and he must wait six months before he can apply for a new license. *See Exhibit 1 (In re: Michael Todd, an individual; All Things Wild, Inc., an Illinois corporation, et al., AWA Docket Nos. 18-0067, 18-0068, and 18-0069).* Todd was also assessed a \$100,000 civil penalty, payment of which was deferred for a four year probationary period contingent on full compliance with the AWA, its implementing regulations, and the consent decree. *Id.* Pursuant to this decision, Todd cannot exhibit tigers for at least six months. *Id.*; *see also* 7 U.S.C. § 2134 and 9 C.F.R. § 2.1(a)(1).

On the same day this decision was entered, Todd’s tiger exhibit “White Tiger Discovery”¹ was on display at the Alabama State Fair, which ran through September 27. *See Exhibit 2 (fair schedule); Photos 1–5 (social media evidence of Todd’s exhibit running for the entire fair).* PETA also received footage from a concerned citizen taken on September 27, which shows fairgoers feeding tigers meat with tongs and staff members donning shirts embroidered with “All Things Wild Zoological Park.” *See Video 1, Video 2, and Photo 6.* This exhibition appears to violate the consent decree, 7 U.S.C. § 2134, and 9 C.F.R. § 2.1(a)(1).

In addition, Todd’s tiger exhibit appears to be scheduled for the [Georgia State Fair](#), beginning **today**, October 2, and running through October 11. *See Exhibit 3.* The Georgia fair is operated by the same producer of the Alabama fair (*see Exhibit 4*), and the exhibit is described in the same way in the Alabama State Fair schedule. Accordingly, it appears that Todd will be at the Georgia State Fair exhibiting these tigers without a valid license, in apparent violation of the consent decree, 7 U.S.C. § 2134, and 9 C.F.R. § 2.1(a)(1).

Todd’s history of colluding with Marcus Cook in order to circumvent Cook’s license revocation is the reason his AWA license was terminated. *See Exhibit 1.* As the consent decree chronicles, Todd defied the USDA’s revocation of Cook’s license for years and has wasted no time in defying his own license termination, a termination that he agreed to in order to settle the USDA’s enforcement proceeding.

¹Michael Todd calls his traveling tiger show the “White Tiger Discovery exhibit.” *See* <https://www.allthingswildzoo.com/all-things-wild-zoo-state-fairs-festivals.html> (listing available programs for fairs and festivals, including “the very popular Royal White Tiger Discovery exhibit”).

PEOPLE FOR
 THE ETHICAL
 TREATMENT
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 FOUNDATION

Washington
 1536 16th St. N.W.
 Washington, DC 20036
 202-483-PETA

Los Angeles
 2154 W. Sunset Blvd.
 Los Angeles, CA 90026
 323-644-PETA

Norfolk
 501 Front St.
 Norfolk, VA 23510
 757-622-PETA

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Under the consent decree, the \$100,000 civil penalty is “due and payable” should Todd violate the AWA or the decree anytime within four years of the order. He did not even wait *one day* before plainly operating in violation of both. Please ensure that Todd, Cook, and any other responsible parties are held accountable to the fullest extent of the law.

As you investigate Todd’s apparent unlawful exhibition, please also consider that the way these tigers were exhibited appears to violate the AWA. The September 27 videos (Video 1, Video 2) show handlers not maintaining 6’ distance between the public (nor requiring the public to stay 6’ away from the tigers) and allowing public members to hold tongs and directly feed the tigers without wearing gloves or showing any clear sign of disinfecting between handling the tool. Despite the fair requiring all visitors to wear masks, one handler pulled his mask down and it was not covering his face at all. Big cats can contract SARS-CoV-2, and the USDA has advised all exhibitors holding big cats to don extra protective equipment and practice physical distancing as much as possible.² Members of the public are advised to remain *at least* 6’ away from big cats. Animals should only be exhibited “under conditions consistent with their good health and well-being,” but Todd and his employees apparently have disregarded the USDA’s guidelines and are exposing these tigers to potential infection, in apparent violation of 9 C.F.R. § 2.131(d)(1).

Please also inspect these tigers and their veterinary records, to ensure that they are receiving adequate veterinary care pursuant to 9 C.F.R. § 2.40. Exhibiting big cats across the country at crowded fairs while allowing public feedings puts these susceptible felids at risk of contracting SARS-CoV-2. Thus, it is imperative to confirm that these animals are not showing any signs of COVID-19 and that there is record of frequent veterinary evaluation for symptoms. If Todd claims that these feedings have been approved by his attending veterinarian, **please confirm this with the veterinarian directly.**

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

Very truly yours,



Debbie Metzler, M.S.

Associate Director of Captive Animal Law Enforcement

[REDACTED]

cc: Dr. Laurie Gage, Big Cat and Marine Mammal Specialist [REDACTED]
John V. Rodriguez, Attorney for USDA in AWA Docket Nos. 18-0067, 18-0068, 18-0069
[REDACTED]

²See USDA Advisory: https://www.aphis.usda.gov/animal_welfare/downloads/draft-advisory-note-for-felids-oa.pdf