

January 22, 2021

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

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

Re: Request for Investigation of Bhagavan Antle (license no. 56-C-0116) for Allowing Direct Public Contact With Juvenile and Adult Big Cats in Apparent Violation of the Animal Welfare Act

Dear Dr. Gibbens:

I am writing on behalf of PETA to request that the U.S. Department of Agriculture (USDA) promptly investigate Bhagavan Antle (license no. 56-C-0116) for apparent violations of the Animal Welfare Act (AWA).

On January 15, 2021, *The Daily Mail* [reported](#) that Larsa Pippen and her children visited Antle's facility in Miami, Florida and engaged in direct public contact with dangerous wild animals. (See Exhibit 1.) In the article's photos, Larsa can be seen cradling one juvenile tiger while another was held over her shoulder, as well as a separate shot where she is holding an adult tiger. The article described Larsa as fearless in spite of the fact that "the tiger's jaws alone were as big as her head."

Antle proudly advertises on his website some of the [several other celebrities and public figures](#) that he has allowed to have direct physical contact with dangerous big cats—in the last two years, there's been an average of one to two of these kinds of dangerous encounters a month. (See Exhibit 2.) PETA has repeatedly reported Antle's dangerous stunts to the USDA, including when Lil Pump posed with juvenile tigers (see AC21-034), and when Jin Gates held a full-grown jaguar in his lap while inside a vehicle (see AC19-143). And yet, the USDA has apparently refused to take any meaningful action to prevent Antle from allowing these types of dangerous, direct contact stunts.

Big cats are apex predators, and the USDA has established that there are *no* circumstances under which it is safe for the public to even touch, let alone hold, juvenile and adult big cats. Big cat exhibitors—with the exception of Antle—are routinely cited when they allow cubs more than 12–16 weeks old to interact with the public¹ and when they restrain big cats with only a leash and no other barrier,

¹ See USDA Inspection Report citations in violation of 9 C.F.R. § 2.131(c)(1) for Timothy Stark, license no. 32-C-0204, Aug. 20, 2014 and Sep. 13, 2015 (for allowing cubs who were 14 and 16 weeks old to interact with the public); Roberta Kirshner, license no. 93-C-0504, Jul. 20, 2016 (for allowing a visitor to interact with a 16-week-old lion); Jay Owenhouse, license no. 81-C-0031, May 21, 2019 (for allowing the public to have contact with a juvenile tiger with no barriers present); Thomas Edmonds, license no. 33-B-0435, Jan. 16, 2020 (for allowing the public to interact with a 20-week-old tiger); and Michael Poggi, license no. 58-B-0595, Dec. 7, 2020 (for allowing a visitor to have direct contact with a leopard, which resulted in severe injuries that required hospitalization).

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including when animals are exhibited on stage and not directly interacting with the public.²

The USDA's [guidance](#) asserts that there is an "inherent danger present for both the viewing public and the exhibited animal(s) where there is any chance that the public could come into contact with juvenile or adult big cats" and that "direct public contact with juvenile and adult felines does not conform to the handling regulations, because *it cannot reasonably be conducted without a significant risk of harm to the animal or the public.*" (Emphasis added) (citing 9 C.F.R. § 2.131(c)(1)). The policy further states that handlers and leashes are *not* substitutes for the "sufficient distance and/or barriers" required by the AWA. This guidance also makes clear that the "public" and "general viewing public" are considered to be customers, visitors, and even in some cases volunteers. The USDA has found that reporters who visit outside of normal operating hours are considered members of the public.³ While Antle appears to only offer direct physical contact encounters with these dangerous animals exclusively to celebrities and not to the general public, these participants are still public visitors.

The USDA's [Animal Welfare Inspection Guide](#) states that it "considers big cats to become juveniles when they reach roughly 12 weeks of age" which is approximately when "dangerous animals, such as tigers [and] lions...become too big, too fast and too strong to be used for public contact." The inspection guide even includes the following as an example of what should be cited as a direct noncompliance: "Public exhibition that allows direct contact of a dangerous animal (big cat, bear, wolves, elephant, great ape, etc.) with the general public without sufficient or adequate barriers, *such as use of a juvenile or adult big cat in photo shoots.*" (Emphasis added).

Over 15 years ago, the USDA told Antle that his "method of contact photographs between adult large cats and members of the public [was] considered to be in violation of the handling regulation [9 C.F.R. § 2.131(c)(1)], and should be discontinued immediately." (*See* Exhibit 3, August 26, 2005 USDA Letter; *see also* Exhibit 4, February 8, 2006 USDA Letter (noting that "there was no way direct contact between the public and adult or juvenile lions or tigers could be done safely.") Antle challenged this determination in federal court and lost.⁴ In several administrative proceedings brought by the USDA in the past decade, it has consistently interpreted the handling regulations as prohibiting direct contact between the public and adult or juvenile big cats, regardless of the presence of handlers and leashes—which is consistent with its 2005 and 2006 letters to Antle.⁵ Thus, it has long been a regulatory requirement that dangerous animals like big cats must be physically separated from the public.

² *See* USDA Inspection Report citations in violation of 9 C.F.R. § 2.131(c)(1) for Grant Kemmerer III, license no. 23-C-0203, Oct. 5, 2006 and May 11, 2016 (repeatedly cited for only restraining an adult leopard with a chain held by the handler or tethered to his waist); CJ's Great Cats World Park, license no. 92-C-0144, Jul. 11, 2011, Jul. 20, 2013, and Sep. 21, 2013 (repeatedly finding that a rope divider and leashes for juvenile tigers and leopards were insufficient public barriers); Gregg Woody, license no. 33-C-0218, Feb. 16, 2016 (for only restraining a juvenile liger with a harness and leash during exhibition); and Zootastic of Lake Norman, license no. 55-C-0272, Nov. 13, 2019 (for exhibiting a juvenile tiger with only a harness and leash).

³ *See* USDA Inspection Reports for Clubreturns, Inc, license no. 56-C-0259, May 18, 2015 and Joseph Maldonado Passage, license no. 73-C-0139, Jul. 25, 2017.

⁴ *See Antle v. Johanns*, No. Civ. 4:06-1008, 2007 WL 5209982, at *4 (D.S.C. June 5, 2007), *aff'd*, 264 F. App'x 271 (4th Cir. 2008).

⁵ *See e.g., In re: Sam Mazzola*, AWA Docket Nos. 06-0010 and D-07-0064, Decision and Order (Nov. 24, 2009); *In re: Jamie Michelle Palazzo, et. al*, AWA Docket No. 07-0207, Decision and Order (May 10, 2010); *In re: Karl Mitchell*, AWA Docket No. 09-0084, Decision and Order (Dec. 21, 2010); *In re: Stearns Zoological Rescue & Rehab Center, Inc.*, AWA Docket No. 15-0146, Complainant's Response to Respondent's Petition for Appeal (Apr. 27, 2017); and *In re: Timothy L. Stark*, AWA Docket Nos. 16-0124 and 16-0125, Complainant's Brief in Support of Proposed Findings of Fact, Conclusions of Law, and Order (May 6, 2019).

It is unacceptable that the USDA has apparently stopped trying to prevent Antle's unlawful conduct. Allowing these reckless encounters with celebrity visitors to continue risks someone getting injured or maimed.

Additionally, Larsa Pippen and her family's recent direct contact interactions with tigers during the pandemic put those animals at risk of contracting COVID-19. The USDA has issued [guidance](#) advising that all hands-on encounters with big cats should be suspended until it can be assured that humans do not pose any risk of SARS-CoV-2 infection to these animals. PETA has previously reported that Antle has continued to allow cub-petting interactions despite the USDA's advisory (*see* complaints AC20-314 and AC21-034). News continues to come forward of [captive big cats becoming infected with SARS-CoV-2](#), so this serious concern is still a very real threat to the health and well-being of these animals. The Pippens also interacted with an infant chimpanzee (*see* Exhibit 1), who may be susceptible given that [captive gorillas have also tested positive for SARS-CoV-2](#). Animals should only be exhibited "under conditions consistent with their good health and well-being," but these encounters are exposing the animals to potential infection, which is an apparent violation of 9 C.F.R. § 2.131(d)(1).

The individual animals used for these public encounters should be identified and inspected, including a review of their veterinary records, to ensure that they are receiving adequate veterinary care pursuant to 9 C.F.R. § 2.40. It is imperative to confirm that these animals are not showing any signs of COVID-19 and that there is a record of frequent veterinary evaluation for symptoms. Failure to conduct frequent evaluations of susceptible felids and primates exposed to constant human handling would be negligent given these unprecedented circumstances, and the USDA must assess the *adequacy* of the veterinary care provided for these animals.

Please ensure that the public and animals are safeguarded in accordance with the AWA, and hold Bhagavan Antle and any other responsible parties fully accountable for any and all violations you discover during your investigation.

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]