

Lisa Lopez & Marcus Cook

1781 River Oak Dr., Kaufman, TX 75142

Lisa Lopez and Marcus Cook, operators of All Things Wild (aka “Genesis Shur-Path,” “White Tiger Discovery,” and “Royal White Tiger Discovery”), have illegally exhibited tigers all over the country and repeatedly failed to meet the minimum standards for the care of animals as established in the federal Animal Welfare Act (AWA). Cook—who confines the tigers on his property in Kaufman, Texas—had his U.S. Department of Agriculture (USDA) exhibitor license (under the name ZooCats Inc.) permanently revoked in 2012 after he was charged with nearly 100 violations of the AWA, including endangering the lives of animals and the public, keeping animals in filthy enclosures, and denying them adequate nutrition and veterinary care. Shortly after his license revocation became final—meaning he could no longer legally transport or exhibit tigers—he partnered with animal exhibitor Michael Todd and illegally used Todd’s exhibitor license to continue the tiger displays at thousands of fairs and other events. The USDA eventually terminated Todd’s license for allowing Cook to use it to circumvent the agency’s revocation of Cook’s license. Cook and Lopez—who was denied her own exhibitor license in 2017— have continued to exhibit tigers by illegally using the license of yet another animal exhibitor, Genesis Shur-Path Inc.

April 27, 2022: The USDA issued Genesis Shur-Path a critical citation for refusing to demonstrate to inspectors how a transport trailer’s temperature control systems cooled

the section of the trailer where the tiger enclosures were kept during travel. A repeat citation was issued for exhibiting two Bengal tigers from the Kaufman, Texas, site that was still unapproved by the USDA. The inspector noted that “the exhibitor has been cited for conducting regulated activity from this unapproved site yet continues to do so.”

The USDA also cited Genesis Shur-Path for failing to handle public interactions with the tigers in a way that would have minimal risk of harm to the animals and the public. During the inspection, the public was allowed to use tongs to stick pieces of chicken into the enclosures to feed the tigers while the attendant stood back to take photos. The inspector stated that the “way in which public feeding is being conducted by this exhibitor poses significant public and animal safety risks” and noted that the “tigers could suffer injuries from the scalloped-edged tongs. In such close proximity, the public could be injured from accidentally coming into contact with the tigers.” Another citation was issued for failing to have appropriate markings on the traveling enclosures. They were not marked “Live Animal” or “Wild Animal” on the top and on at least one side to indicate the correct upright position.

March 2, 2022: Officials with Fort Worth Animal Care & Control canceled an illegal tiger display by Lisa Lopez, operating under the name All Things Wild, at the Cowtown Fair in Fort Worth, Texas. The exhibit violated a city code prohibiting tigers from being within city limits.

February 9, 2022: The USDA issued Genesis Shur-Path a repeat citation for failing to have a responsible adult available to accompany officials during an inspection.

November 18, 2021: The USDA cited Genesis Shur-Path for failing to have a responsible adult available to accompany

officials during an inspection.

November 17, 2021: The USDA issued Genesis Shur-Path a critical citation for failing to have an updated inventory, a disposition paper for one skunk, and a program of veterinary care as well as for refusing to finish the inspection. During the inspection, the licensee received a phone call from her mother, who instructed her to tell officials to “speak with their lawyers” and to “return at another time to avoid getting citations because they were between properties.” Genesis Shur-Path was also cited for failing to notify the USDA regarding a new site in Florida and for conducting regulated activity from a site in Kaufman, Texas, that had not been approved.

March 21, 2021: The USDA cited Genesis Shur-Path for exhibiting two white Bengal tigers from an unapproved site in Kaufman, Texas, at the Trinity Valley Exposition grounds in Liberty, Texas.

March 21, 2021: The USDA cited Lisa Lopez, doing business as “All Things Wild,” for exhibiting two white Bengal tigers at the Trinity Valley Exposition grounds in Liberty, Texas, without a valid license and ordered All Things Wild to cease and desist from exhibiting tigers without a valid license.

September 18, 2020: In a consent decision and order, the USDA terminated Michael Todd’s license to exhibit animals, finding that he had repeatedly violated the AWA by allowing Marcus Cook, whose own license had been revoked for numerous animal welfare and public safety violations, to use his license in circumvention of federal law. The order also mentioned that both Lisa Lopez and Cook were found to have made fraudulent statements to a USDA official. Todd was ordered to cease and desist from violating the AWA and was prohibited from applying for an AWA license for six months. He was also assessed a penalty of

\$100,000, which he would be required to pay if he violated a four-year probationary period following the order.

September 9, 2019: The USDA cited Michael Todd for housing regulated animals at an unapproved location in Texas. Todd indicated that six tigers and a cougar had been housed at the location and that none of the animals had ever been housed at the approved facility in Illinois. The inspection report stated that housing regulated animals at an unapproved facility meant it could not be ensured that the facility met the regulations and standards for the care of animals.

August 16, 2018: The USDA filed an order to show cause seeking termination of Michael Todd’s AWA license. The USDA alleged that Marcus Cook, who cannot legally exhibit animals, had been transporting and exhibiting tigers under Todd’s license on numerous occasions. It further alleged that by permitting Cook to transport and exhibit animals in circumvention of his license revocation, Todd had “abused the licensure privileges of the AWA.” The USDA stated that permitting Todd to continue holding his AWA license would be contrary to the act’s purpose of ensuring the humane treatment of animals and that, therefore, his license should be terminated.

August 16, 2018: The USDA filed an AWA complaint against Michael Todd alleging multiple willful violations of the act since June 2014, including failing to maintain sufficient distance and barriers between tigers and the public during exhibition, failing to submit written travel itineraries, and failing to provide Animal and Plant Health Inspection Service (APHIS) officials with access for inspection.

October 12, 2016: The USDA cited Michael Todd for failing to allow all the inspectors

onto the Kaufman, Texas, property. When three officials arrived there, they were met by Marcus Cook, who offered to allow two of them onto the property with his lawyer's approval. This was considered a refusal, since neither licensees nor their employees can choose which officials they allow to conduct an inspection.

April 28, 2016: The USDA cited Michael Todd for failing to submit an itinerary prior to traveling with animals overnight and for housing tigers at an unapproved site in Kaufman, Texas, that did not meet AWA requirements. He was also cited for failing to have complete programs of veterinary care for the animals, failing to provide information confirming the employment of two attendants, and failing to provide proof of sufficient vitamin supplementation for the tigers.

May 16, 2015: The USDA cited Michael Todd for failing to submit an itinerary prior to traveling with animals overnight and for housing tigers at an unapproved site in Kaufman, Texas, that did not meet AWA requirements.

November 3, 2014: The USDA cited Michael Todd while traveling in Hondo, Texas, for a repeat violation for failing to demonstrate that the employees handling tigers had adequate experience or knowledge of large felids, which can endanger the lives of the animals as well as the public. Employee training was being conducted by a person who had been ruled by an administrative law judge as not having knowledge or experience to handle large felids. In addition, Todd was cited for failing to submit an itinerary prior to traveling with animals overnight and for housing tigers at an unapproved site in Kaufman, Texas, that did not meet AWA requirements.

August 20, 2014: The USDA cited Michael Todd for two repeat violations while at the

Central States Fair in Rapid City, South Dakota, for failing to have sufficient distance and barriers between the public and tigers while the public was allowed to feed the animals and failing to submit an itinerary prior to traveling with animals overnight.

August 20, 2014: The USDA issued Marcus Cook a repeat citation for exhibiting three tigers to the public after his USDA license had been revoked.

June 6, 2014: The USDA cited Michael Todd for two repeat violations while at a festival in Lee's Summit, Missouri, for failing to have sufficient distance and barriers between the public and tigers while the public was allowed to feed the animals and failing to demonstrate that the employees handling the tigers had adequate experience or knowledge of large felids. The public was allowed to feed chicken to the tigers using kitchen tongs, and the barrier was not of a sufficient height or at a sufficient distance to prevent people from potentially sticking their fingers or hands into the enclosure. One man was holding a toddler beyond the barrier so that the child could hold the tongs while feeding the tiger. An administrative law judge ruled that one of the attendants present didn't have the knowledge or experience to handle large felids and that the attendant had violated the AWA in the past when handling large felids. In addition, Todd was cited for failing to provide the tigers with a diet of sufficient nutritive value, using a nutritional supplement for the tigers that didn't have a label with the supplement name or dosage instructions, and failing to submit an itinerary prior to traveling with animals overnight.

June 6, 2014: The USDA issued Marcus Cook a repeat citation for transporting three tigers and exhibiting them to the public after his USDA license had been permanently revoked.

August 31, 2013: The USDA cited Marcus Cook for transporting tigers and exhibiting them to the public in Plymouth, Indiana, after his USDA license had been permanently revoked.

July 26, 2012: The USDA cited Michael Todd for keeping expired medications, failing to label medications properly, and having medications on site that weren't approved by a veterinarian for use in large felids. He was also cited for failing to have caretakers who were experienced and knowledgeable in handling large felids. The large carnivore supervisor, who was involved in training employees, was ruled by an administrative law judge to have violated the AWA in the past when handling large felids. In addition, Todd was cited for failing to maintain enclosures in good repair, including one with loose floor coverings and another with rusted, jagged metal edges. He was also cited for having three enclosures that weren't adequately constructed to contain the tigers and prevent escapes.

June 8, 2012: The USDA cited Michael Todd while at the Wichita Riverfest in Wichita, Kansas, for housing tigers at an unapproved site in Kaufman, Texas, that had not been confirmed to comply with the AWA. He was also cited for failing to provide the USDA with information regarding this facility, including employee information and a copy of the lease of the property. Two tigers under Todd's USDA license were knowingly being exhibited by Marcus Cook, whose USDA license had been revoked.

April 22, 2012: The USDA cited Michael Todd while traveling for housing tigers at an unapproved site in Kaufman, Texas, that had not been confirmed to comply with the AWA. He was also cited for failing to have sufficient distance and barriers between the public and tigers while the public was allowed to feed the tigers. The barrier was

constructed in a manner that could allow a small child to reach into the enclosure.

February 6, 2012: The USDA issued a consent decision ordering Marcus Cook to cease and desist from violating the AWA and assessed him a civil penalty of \$7,500.

June 23, 2011: The USDA cited Marcus Cook for failing to maintain structurally sound enclosures in good repair. Two cargo containers holding tigers had wooden floorboards needing repair, and another enclosure holding a tiger had surfaces that had entirely rusted through, leaving holes in the metal.

April 4, 2011: The USDA cited Marcus Cook for failing to have a responsible adult available to accompany officials during an inspection.

February 2, 2011: The United States Court of Appeals for the Fifth Circuit denied Marcus Cook's petition and upheld an order by the secretary of the USDA compelling Cook to cease and desist from violating the AWA and permanently revoking his exhibitor license.

June 8, 2010: The USDA issued Marcus Cook a direct, repeat citation for having little to no veterinary assessment of several unexplained tiger deaths. A female tiger named Anastasia died during a difficult birth. She received no veterinary care prior to or during the birth, and no necropsy was performed because the attending veterinarian believed the problem was likely due to genetics. A female tiger named Ariel aborted her cubs and received no veterinary care before or during, and no necropsy was performed because the attending veterinarian believed the stillbirths were also due to genetics. Another female tiger gave birth to three cubs, including one who was stillborn, and no necropsy was performed. The inspector noted that previous violations

of the AWA, such as documented inadequate diets, may have contributed to these deaths.

June 7, 2010: The USDA issued Marcus Cook a direct repeat citation for failing to ensure that the feeding schedule approved by the attending veterinarian was followed and that proper amounts and types of additives were used in the food prepared for the animals. During the inspection, officials observed that several animals were given chicken with no visible sign of any additive as required by the attending veterinarian, and according to a photo taken during the inspection on May 13, 2010, the number of tubes of commercially prepared diet and the location of the tubes in the freezer remained the same on June 7 as they were on May 13. During a traveling inspection with the owner on June 8, 2010, the owner could not say what the animals were actually being fed and stated that the keeper was confused about which diet she was feeding. The inspection report noted that the professional opinion of both APHIS officials was that the animals were primarily being fed an inappropriate diet of chicken without the required additives. The report noted that this diet of chicken with minimal or no additives, offered for prolonged periods of time at this facility, was a contributing factor to the confiscation of animals from this facility on two different occasions. Cook was also cited for failing to have adequately trained employees, as the keeper was not adequately trained to feed the animals at the facility without direct supervision.

May 13, 2010: The USDA issued Marcus Cook a repeat citation for failing to have appropriate veterinary assessments of the causes of multiple tigers' deaths conducted. During the inspection, it was noted that the tiger Anastasia had died due to a difficult birth and that another tiger had aborted her cubs. No necropsies were performed to determine the causes of death for these

tigers.

August 20, 2009: The USDA issued Marcus Cook a repeat citation for failing to have a sufficient number of adequately trained employees to maintain professionally acceptable levels of husbandry. At the time of inspection, the owner was only available by phone and was not present to supervise the operations foreperson, who was handling the day-to-day husbandry, including evaluating and feeding the animals.

July 27, 2009: The USDA issued a decision and order requiring Marcus Cook to cease and desist from violating the AWA and permanently revoking his AWA license (#74-C-0426). The USDA found that Cook had violated the AWA in numerous ways, including by failing to drain enclosures containing pools of water adequately—on June 12, 2003, five tigers were observed to be soiled, wet, and standing in mud; and on February 9, 2006, multiple tigers had dried mud caked to their hair, legs, and abdomens (though it had not rained for a week) and one tiger had chewed off some hair to get rid of the caked mud. Cook further failed to follow the prescribed dietary recommendations of the attending veterinarian. On February 9, 2006, Dr. Laurie Gage, a veterinarian with expertise in the care and feeding of big cats, found tiger cubs with misshapen rear legs indicative of metabolic bone disease caused by the poor diet of either the cubs or their mother. Cook failed to provide two tiger cubs who were suffering from alopecia (hair loss) with veterinary care and was instead erroneously treating the tigers with medication for ringworm based on his own incorrect, uninformed diagnosis. Cook also failed to have two young tigers and a lion evaluated by a veterinarian for protruding hip bones, dull coats of hair, and having less vigor than other animals at the facility, and on May 23, 2002, Cook used “cattle prods” to control a

tiger during a photoshoot.

July 8, 2009: The USDA issued Marcus Cook a repeat direct citation for failing to provide three lions with adequate veterinary care and failing to assess the health and well-being of the animals daily and accurately relay this information to the attending veterinarian in a timely manner. As first noted during the previous inspection, a male white lion named Jaz was unable or unwilling to stand, and the inspectors could therefore not evaluate his neurological function. His right eye appeared very inflamed with a considerable amount of discharge, and his right ear was drooping. Jaz appeared extremely lethargic and had an approximately 3-inch abrasion on his right hip and an approximately 2-inch abrasion on his right shoulder. According to the report, these wounds were suggestive of pressure sores, which could have occurred if Jaz remained in one position for long periods of time, which would coincide with the fact that he was unable or unwilling to stand. During the inspection, the licensee and his employee were unwilling to assist the inspectors in getting Jax to stand.

As during the previous inspection, a male white lion named Shazam was also unwilling or unable to stand during this inspection and therefore the inspectors could not evaluate his neurological function. The inspectors had concerns about Shazam's ability to ambulate properly. The licensee and his employee were unwilling to assist the inspectors in getting Shazam to stand.

A female white lion named Sheila was observed to be extremely ataxic and appeared to be staring vacantly at moments, and she appeared to have begun chewing off her coat. The keeper was questioned about her abnormal gait and stated that he had not noticed it until that day. The inspectors noted that Sheila

appeared to be suffering because of the lack of adequate veterinary attention and daily husbandry care. The licensee was directed by the attending veterinarian to change Sheila's diet to red meat on May 15, 2009, and at the time of this inspection, this change had not been made.

Cook was also issued a repeat direct citation for failing to provide animals with food of sufficient quantity and nutritive value to maintain good health. At the time of inspection, the diet for the adult big cats consisted of bone-in chicken legs and breasts with a vitamin supplement sprinkled on top. Three different inspection reports from earlier that year documented that this diet was inadequate. Cook was issued another repeat direct citation for failing to have a sufficient number of adequately trained employees to maintain an acceptable level of husbandry. At the time of inspection, the employee designated for the inspection was lacking professionally acceptable levels of husbandry skills to be working alone at this facility and was again working without the presence of an adequately trained employee with the required skills to work with dangerous animals. Because of this, the veterinary care issues were not being relayed to the attending veterinarian or the owner of the facility in a timely manner.

June 9, 2009: The USDA issued Marcus Cook a direct repeat citation for failing to assess the health and well-being of animals daily and accurately relay this information to the attending veterinarian in a timely manner. An adult male white lion named Jaz was observed to have obvious rear-leg ataxia on a previous inspection. When the licensee was asked about the lion's condition, he said he had not noticed any abnormalities, indicating that daily observation of the animals was inadequate. Inspectors were not provided with any documentation from the attending

veterinarian regarding an evaluation of this lion. Additionally, on May 15, 2009, the licensee was directed by the attending veterinarian to change the diet for a white lion named Sheila to red meat, and this change had not been made at the time of this inspection. Cook was also issued a repeat direct citation for failing to provide animals with food of sufficient quantity and nutritive value to maintain good health. At the time of inspection, the diet for the adult big cats consisted of bone-in chicken legs and breasts with a vitamin supplement sprinkled on top. Two prior inspection reports from that year documented that this diet was inadequate.

May 13, 2009: The USDA issued Marcus Cook a repeat direct citation for failing to assess the health and well-being of animals daily and accurately relay this information to the attending veterinarian in a timely manner and failing to follow veterinary instruction. During the inspection, a male white lion named Jaz was observed to have obvious rear-leg ataxia. When the licensee was asked about Jaz's condition, he said that he had not noticed any abnormalities, and therefore, a veterinarian had not evaluated the lion. A 6-month-old female white tiger cub was also observed to be in poor condition. She appeared stunted and underweight for her age, her coat was dull, and her front legs had a bowed appearance suggestive of metabolic bone disease, which is commonly caused by an inappropriate diet deficient in calcium. She was obviously favoring her right front leg, and lameness in one or more legs is frequently an early clinical sign of metabolic bone disease. The veterinarian had seen the cub and advised "restricted exercise" as a treatment for the lameness, but the licensee did not follow this instruction and kept the cub in a large enclosure.

Cook was also issued a repeat direct citation for failing to provide animals with

food of sufficient quantity and nutritive value to maintain good health. At the time of inspection, the diet for the adult big cats consisted of bone-in chicken legs and breasts with a vitamin supplement sprinkled on top, and the tiger cub was fed boneless chicken breasts with a vitamin supplement sprinkled on top. According to the vitamin manufacturer's nutritionist, sprinkling the vitamin on top was not advised and the supplement needed to be ground into the meat or placed within a pocket of the meat. It was noted that, when fed, a lioness took the meat and rubbed it in the dirt before eating it, suggesting that she did not ingest even a fraction of the vitamins that were sprinkled on top. A March 20, 2009, inspection report documented that these diets were inadequate. During that inspection, the licensee assured inspectors that he would begin feeding a complete and professionally acceptable diet, but he was still feeding the all-chicken diet at the time of this inspection. When the licensee was asked to explain his decision to continue the current diet, he produced a document entitled "Animal Nutrition Guide" that stated that it was prescribed by the attending veterinarian in collaboration with a nutritional consultant. On May 15, large felid field specialist Dr. Laurie Gage contacted the office of this nutritional consultant and learned that no one was acting as a consultant with this licensee and that to their knowledge, the licensee had written the entire "Animal Nutrition Guide" himself with no endorsement from a nutritional consultant. Gage also learned that between April 2006 and the time of this inspection, the licensee had only purchased two 25-pound buckets of vitamin supplement. If the licensee were following the recommended feeding instructions for the supplement, he would be using a 25-pound bucket approximately every 74 days to supplement all of his animals properly, requiring over 10 such buckets of supplement over the prior two years. Additionally, the amount of

calcium contained in the supplements was insufficient to properly balance the all-chicken diet fed to the tiger cub, and the cub was showing physical and clinical signs suggestive of metabolic bone disease. The tiger cub was being fed supplements that contained less than half the amount of calcium carbonate necessary to develop strong bones and prevent metabolic bone disease.

The USDA issued Cook another repeat direct citation for failing to have a sufficient number of adequately trained employees to maintain an acceptable level of husbandry. The keeper/care provider for the animals was working at the facility without the direct supervision of an employee with a background in the care of large cats. When asked questions concerning the feeding practices at the facility, the keeper provided answers that were different from the information provided by the licensee. The keeper and licensee gave conflicting statements regarding the amount of supplement they were giving the tiger cub, and neither of the stated amounts provided enough calcium to adequately balance an all-chicken breast diet.

April 1, 2009: The USDA issued Marcus Cook a repeat citation for failing to maintain an up-to-date written program of veterinary care. The last date signed by the attending veterinarian was January 2007, but the program stated that the attending veterinarian would make annual visits at minimum. Cook was also cited for failing to maintain enclosures in good repair to contain animals and protect them from injury. An enclosure used to house three tigers while being exhibited had numerous panels where the welding holding the fabric to the frame was broken and rusted. The panel of the enclosure where public feeding took place had five points where the welding had completely broken loose from the frame, posing a risk of injury to both the

animals and the public.

March 20, 2009: The USDA issued Marcus Cook a direct citation for failing to provide two tigers and a lion with adequate veterinary care. A male lion named Kana had an injury to the last 3 to 4 inches of his tail. The area had no skin, and the tissue was red and inflamed. The injury had apparently been present since January 2009. The licensee had intermittently been applying a topical treatment that was ineffective and had not asked the attending veterinarian to examine or treat the lion. A tiger named Apollo was lethargic, weak, and listless. He was walking slowly, was unsteady on his feet, had a dull coat, and was underweight. Most of his hair had been plucked or chewed off, and the skin of his testes was abraded and inflamed. Apollo had not been provided with any veterinary care. A tiger named Amol was extremely thin and had minor lacerations along both cheeks, an abrasion on his right front foot, and a lesion resembling a lick granuloma on his left hind foot. The licensee failed to make daily observations of this animal in order to assess his health and well-being and failed to convey the status of this animal to the veterinarian. Cook was issued an additional direct citation for failing to provide animals with adequate nutrition. Two tigers were severely underweight, and the animals were offered only poultry, which is not an optimal diet for non-domestic cats. The keeper stated that all of the animals were fasted once a week, but the inspector noted that animals as thin as these tigers should not be fasted at all until they have gained sufficient weight. The staff lacked sufficient knowledge to recognize that the animals were too thin and were incapable of adjusting the individual diets accordingly. Cook was also issued a direct citation for failing to have adequately trained employees, as the keeper was working without the direct supervision of someone with a background in animal care and could

not provide consistent answers about the care supplied to the lion with the tail injury, and his answers contradicted answers given at the previous inspection.

The USDA issued Cook a repeat direct citation for failing to implement a permanent drainage solution to eliminate standing water and areas of heavy mud in enclosures. Cook also received a direct citation for failing to handle animals in a manner that did not cause behavioral stress, physical harm, or unnecessary discomfort. Due to the chronic inadequate veterinary care, poor nutrition, and poor drainage at the facility, the animals suffered, especially a tiger named Apollo who was observed to be weak and listless. It was evident that the stress of these conditions caused Apollo pain and suffering. During the inspection, Apollo exhibited abnormal behavior by licking and chewing the dirt where he was lying for minutes at a time several separate times, and all the other big cats (with the exception of a leopard housed on concrete) had dried mud caked to their legs, tails, and abdomens. Cook was also cited for failing to produce medical records during an inspection after being asked to provide these records repeatedly and for failing to comply with standards regarding the humane handling, care, treatment, housing, and transportation of animals.

March 16, 2009: The USDA issued Marcus Cook a direct citation for failing to provide a lion and a tiger with adequate veterinary care. A tiger named Apollo appeared to be lethargic and was unwilling or unable to interact with people in the vicinity of his enclosure or his pen mate. Apollo was very underweight in comparison to other animals at the facility, and the report advised that the animal needed to be taken to a licensed veterinarian to access his coat and body condition. A male lion had an injury to the last 3 to 4 inches of his tail that had apparently been present since January

2009 and had sustained a similar injury in late 2008. This earlier injury was treated and healed, and the same treatment was being applied to the current tail injury with mixed results. The report advised that the animal needed to be taken to a veterinarian's facility so the injury could be evaluated by a licensed veterinarian to determine the effectiveness of the prescribed treatment. Cook was also issued a repeat citation for failing to have a permanent drainage solution to rapidly eliminate excess water in enclosures. At the time of inspection, the majority of pens housing tigers and lions had large areas of standing water and heavy mud. This drainage problem following periods of rain had been going on at this facility for years with no permanent solution.

September 24, 2008: The USDA issued a decision and order (D&O) requiring Marcus Cook to cease and desist from violating the AWA; from publicly exhibiting lions, tigers, or other dangerous animals who are not under the direct control and supervision of a knowledgeable, experienced handler who is at least 21 years of age; and from publicly exhibiting any lion or tiger unless the animal is contained inside a suitable primary enclosure with any secondary barrier sufficiently distanced from the primary enclosure as well as revoking Cook's AWA license (#74-C-0426). The D&O stated that Cook had repeatedly endangered the lives of his customers, employees, and animals and that he had claimed to have expertise and credentials that he did not have in order to mislead government employees. In 1998, his license as a peace officer was revoked after a hearing that found that Cook falsified his police officer application by representing himself as a high school graduate when, in fact, he had not completed high school. As part of the application, Cook filed a fake high school diploma and a fake educational transcript. The D&O also stated that allowing Cook to have an exhibitor's license

would subject both the public and animals to an unacceptable level of risk of harm. Cook was found to have exhibited tigers without physical barriers separating them from the public; used “cattle prods” to control a tiger; allowed children to handle and pose with tiger cubs, which resulted in a child’s being scratched by a cub; allowed members of the public, including a young child, to feed tigers raw meat on a stick through the metal bars of the tiger’s enclosure; exhibited a young tiger to the public without barriers, resulting in the tiger’s biting a member of the public; handled tigers in a manner that caused them trauma and behavioral stress with excessive risk of harm to the tigers and the public; failed to follow sanitation standards in cages housing both prairie dogs and a bear that were unclean, with excessive fecal material and urine; and failed to follow employee standards by allowing an unsupervised employee untrained in animal husbandry practices to care for three wolves, two cougars, a bear, and a tiger. The D&O also stated that ZooCats Inc. was registered as a research facility under registration number 74-R-0172 but was not a research facility as defined by the AWA.

June 10, 2008: The USDA cited Marcus Cook for failing to maintain structures in good repair. A habitat for two tigers had a wooden spool that had missing wood and exposed nails, creating a potential source of injury to the animals.

March 11, 2008: The USDA cited Marcus Cook for failing to have a responsible adult available to accompany USDA officials during an inspection.

February 25, 2008: The USDA cited Marcus Cook for failing to minimize the risk of harm to animals and the public during exhibition by having insufficient distance and barriers between animals and the viewing public. At the time of inspection, the barrier in front of two tigers was

approximately 1 foot from the primary enclosure fence, which was not a sufficient distance to ensure the safety of the animals or the public. Barriers were required to be a minimum of 3 feet from the primary enclosure.

September 28, 2007: The USDA filed a complaint against Marcus Cook alleging that he had willfully violated the AWA. The complaint stated that Cook had not shown good faith, had demonstrated an unwillingness to comply with the regulations, and had made false statements in administrative proceedings before the secretary of agriculture. At the time of this complaint, Cook was operating as an exhibitor under AWA license #74-C-0426 and was registered as a research facility under registration #74-R-0172 but allegedly was not using and did not intend to use live animals in research, tests, or experiments and failed to meet the statutory definition of “research facility.” Alleged violations included failing to provide animals with adequate veterinary care, food, water, or housing; failing to handle tigers as carefully as possible in a manner that did not cause behavioral stress, physical harm, or unnecessary discomfort; and housing adult tigers in an enclosure that was not structurally sound and maintained in good repair and did not have a top, allowing one of the tigers in the enclosure to escape and cause grave injuries to an individual on the premises. Other alleged violations included housing lions in an enclosure with a chewed wooden platform that had exposed nails that the lions could injure themselves on and wood splinters that the lions could easily ingest; failing to provide a method to drain excess water from enclosures rapidly, including from two lion enclosures that had standing water and mud; failing to provide big cats with food that was wholesome and of sufficient quantity and nutritive value to maintain animals in good health; and failing to have a sufficient number of adequately

trained employees to maintain professionally acceptable levels of husbandry under the supervision of a person with a background in animal care. Cook continually failed to comply with regulations despite repeatedly being advised of violations, according to the complaint.

July 10, 2007: The USDA issued Marcus Cook a repeat citation for failing to have a suitable drainage method to eliminate excess water in enclosures rapidly. At the time of inspection, two pens housing lions continued to have areas of standing water and mud even though the area had not seen rain for five days. Cook was also cited for failing to maintain structures in good repair. An enclosure housing two lions had a wooden platform with half its leg supports missing, which the lions had chewed off. The lions were chewing on the missing pieces, which posed a risk of injury from wood splinters and from the creosote on the wood. The nails that held these leg supports on were exposed and could cause injuries.

July 5, 2007: Four white tiger cubs died during a Zoo Dynamics traveling exhibit at the Mighty Thomas Carnival in Duluth, Minnesota. According to Cook, the cubs were born to a tiger on exhibit at the carnival on Tuesday, July 3, and died on Thursday, July 5.

May 8, 2007: The USDA filed a complaint against Marcus Cook alleging that he willfully violated the AWA numerous times between December 5, 2000, and February 3, 2007, including by failing to obtain adequate veterinary care for tiger cubs with alopecia, lesions, and ringworm and for one who couldn't walk and appeared to have metabolic bone disease; allowing children to handle tigers; and using physical abuse and a "cattle prod" to stun a tiger. Cook was operating as an exhibitor under AWA license #74-C-0426 and was registered as a

research facility under registration #74-R-0172 but allegedly was not using and did not intend to use live animals in research, tests, or experiments and failed to meet the statutory definition of "research facility."

February 26, 2007: The Texas Attorney General ordered Marcus Cook to dissolve ZooCats Inc. within 60 days and all other private nonprofit entities within 30 days. Cook was also forbidden from operating any private nonprofit entities in Texas and was enjoined from misrepresenting his safety record in the presentation of animals for public viewing or handling, misrepresenting his qualifications as an animal handler, misrepresenting that he had a B.S. degree in zoology from an accredited college or university, allowing the public to come into contact with animals without prominently displaying a visible sign to the public with a safety warning, and falsely representing that he was certified by various wildlife funds. Cook was also ordered to pay \$30,000 in penalties and up to \$100,000 if he failed to comply with certain provisions set forth in the order.

February 23, 2007: The USDA issued Marcus Cook a repeat citation for failing to provide a tiger with adequate veterinary care. The tiger, Apollo, continued to display significant hair loss, skin irritation, and weight loss, appearing to have a lack of fullness around his hipbone and back areas. According to records, a veterinarian had not seen Apollo since July 6, 2006. Another repeat citation was issued due to a failure to remove water from enclosures rapidly. Lion and tiger pens had visible signs of drainage problems. A third repeat citation was issued for failing to have sufficiently trained employees to maintain acceptable levels of husbandry practices. The only employee present during the inspection was not implementing the facility's operating procedures, and the inspector noted that this employee should be monitored by a

supervisor with a background in working with dangerous animals. Cook was also cited for failing to have accurate records on hand during inspection. The records provided during the inspection did not account for an adult tiger.

July 20, 2006: The USDA issued Marcus Cook two citations related to a tiger escape incident that had occurred on June 16, 2006. First, Cook was cited for failing to maintain structurally sound enclosures in good repair. On June 16, a tiger was able to escape over the side wall of the enclosure, gain access to the inside perimeter fence area, and attack an individual on the premises. This individual sustained severe bodily injury from the attack. Cook was also cited for failing to have a sufficient number of adequately trained employees to maintain professionally acceptable levels of husbandry. On the day of the escape, Cook failed to have a supervisor at the facility who possessed a background in caring for the types of animals at this facility. Cook also failed to have a sufficient number of adequately trained employees at the facility. The person in charge on this date had let the individual inside the protective perimeter fence area, leading to that individual's being attacked when the tiger escaped. The employee was able to pull the individual to safety but when leaving for the hospital failed to alert local authorities that a tiger was still on the loose and unattended in the perimeter fence area. No other employees were present at the facility. Upon returning, the employee contacted Cook to determine how to get the tiger back into the enclosure. Cook "failed to exercise professional judgement when he left the decision to this assistant keeper." The keeper decided to reenter the perimeter fence area alone and was able to get the tiger back into the enclosure. The incident demonstrated the absence of a plan for the safe capture of escaped animals.

June 16, 2006: A part-time employee at Zoo Dynamics, a facility owned by Marcus Cook, was chased and mauled by a 300-pound tiger who jumped an electrified fence when the power failed. The tiger grabbed the man, threw him down, tore off his ear, and left claw marks all over his body. The man spent the weekend in intensive care and received approximately 2,000 stitches.

March 22, 2006: The USDA issued Marcus Cook a repeat citation for failing to provide a tiger with adequate veterinary care. The tiger, Apollo, had not been seen by a veterinarian to determine if the protruding hipbones and vertebrae along his back and his blotched coat were due to diet-related issues or a medical condition. Cook was issued a second repeat citation for failing to provide animals with food of sufficient quantity and nutritive value to maintain good health. At the time of inspection, the diet offered to the animals was not consistent with the facility's "Animal Nutrition Guide." There was no commercially prepared feline diet present, and the supplement added to the chicken and turkey was not being used in the recommended amounts. The inspector noted that the diet needed to be evaluated by the attending veterinarian with input from an animal nutritionist.

March 11, 2006: The USDA cited Marcus Cook for failing to handle animals in a way that minimized risk of harm to both them and the public. At the time of inspection, the licensee was allowing members of the public to pay to feed tigers and get their picture taken. Guests, including small children, were allowed to come through the barrier and stand next to the enclosure, where they could hold a set of tongs with meat through the enclosure fencing to feed the tigers. One attendant was present during these encounters and would stand next to the guest but then retreat to the camera to take a photo. During this time, the public was at risk of potential serious

injury caused by the tigers. At times, adults were close enough to be in contact with the enclosure itself and portions of their clothing would stick through the enclosure. These encounters posed a risk of harm to the tigers if they were to bite the metal tongs and injure the tissue in their mouths and posed a risk to the public if they were to get scratched by the tigers or severely bitten through the enclosure—or, in the case of small children, have their entire hand or a portion of their arm pulled through the enclosure opening.

February 10, 2006: The USDA issued Marcus Cook a direct citation for failing to have a complete plan of veterinary care and a citation for failing to provide animals with adequate veterinary care. A 7-month-old tiger allegedly injured a rear leg 30 days prior to the inspection. The tiger was lying on their back and did not want to get up. An employee at the facility stated that the tiger had reinjured themselves and had shown signs of it for a few days. Another tiger, named Apollo, had a concerning weight and body condition. His hip and back area did not display the fullness of a healthy tiger, and his coat was dull. A veterinarian had not been contacted about either of these tigers. Cook was issued another direct citation for failing to have a veterinarian-approved feeding program. The animals were being fed chicken legs and thigh quarters with turkey, and the nutritive value and quantity of this diet needed to be evaluated by the attending veterinarian. Cook was also cited for failing to have a suitable method to rapidly eliminate excess water from enclosures. The pens housing cougars, tigers, and a lion lacked a drainage method. Rain gutters had become unfastened, allowing rain to run into the enclosures and causing mud, and three of the tigers had dried, caked mud on their coats.

December 17, 2004: The USDA issued Marcus Cook a repeat citation for failing to

maintain accurate records. The records provided during inspection failed to reflect the number of animals present at the facility, and there were no disposition records for two wolves who were present at the previous inspection but were not currently at the facility.

October 22, 2004: The USDA issued Marcus Cook a repeat direct citation for failing to have a veterinarian-approved feeding program for animals. During the inspection, the facility provided an “Animal Nutrition Guide,” which did not address the specific animals at the facility and did not address a feeding program for the wolves at all. Cook was also cited for failing to have an updated and accurate animal inventory. The inventory provided was missing two tigers who were on exhibit with the owner, not at the facility. Cook was also cited for failing to maintain structurally sound enclosures in good repair. An enclosure had a resting platform with a leg that had been chewed on or clawed at, causing it to splinter, posing a potential for injury.

Cook was issued another citation for failing to maintain clean enclosures. An enclosure had an area of standing urine, and the animals in the enclosure were playing in the area, posing a risk of contamination to the animals.

August 30, 2004: The USDA issued Marcus Cook a repeat direct citation for failing to have the attending veterinarian review the plan of veterinary care or conduct an annual visit at the facility. The inspector noted that the condition of two young tigers and a lion was still of great concern as they still displayed protruding hipbones and dull coats. Cook was issued another repeat direct citation for failing to provide animals with food of sufficient quantity and nutritive value to maintain good health. The feeding plan for the animals had been changed without evaluation of each

animal by the attending veterinarian, and no documentation was presented to show that this change was approved by the attending veterinarian. Cook was issued a direct citation for failing to have adequately trained animal care employees at the facility while he was exhibiting out of state.

July 30, 2004: The USDA issued Marcus Cook a repeat direct citation for failing to have the attending veterinarian review the plan of veterinary care, conduct an annual visit at the facility, or provide all animals with adequate veterinary care. The plan of veterinary care had not been updated since June 11, 2002. The tigers and lions at the facility were being fed chicken with no added supplements, and the appearance of two young tigers and two lions was of immediate concern, as these animals were thin with protruding hipbones and dull coats. One of the lions was unwilling to put their full weight on their right front leg and walked with a limp.

Cook was also issued a direct citation for failing to provide animals with food of sufficient quantity and nutritive value to maintain good health. The feeding program involved thawing the meat in a metal tub of water that was static by design and choice, rather than in a refrigerator or in a continuous flow of cold water, considered acceptable methods.

April 16, 2004: The USDA cited Marcus Cook for failing to have the attending veterinarian review the plan of veterinary care and conduct an annual visit at the facility. The current veterinary care plan was dated June 11, 2002, and the attending veterinarian had not made yearly facility visits to review the plan or animals. During inspection, two approximately 4-month-old tiger cubs were thin and exhibited dry coats. A veterinarian had not seen the cubs since they were 30 days old. Cook was also cited for failing to provide tigers with adequate

shelter. Four tigers who were approximately 6 months old had temporary housing that was not large enough to adequately protect all of them from the elements.

November 4, 2003: The USDA cited Marcus Cook for failing to handle animals in a way that minimized the risk of harm to them and the public. A 16-to-20-week-old male lion cub was exhibited to the public in the retail area of a pet store. The cub was on a leash with a harness, and the public was able to pet him. During one of the handling sessions, there were numerous children surrounding the lion cub without additional employees to ensure the safety of the lion and the children. The store's management was not able to demonstrate that the employees handling the lion cub had training or experience in handling potentially dangerous animals. The inspector noted that the lion cub was capable of inflicting serious injury, especially to small children, even if the cub had no intention of doing so.

October 21, 2003: The USDA cited Marcus Cook for failing to having proper ventilation in the cargo containers used for housing. When the inspector entered, two of the containers caused "a burning sensation to the nose and a watering of the eyes from the concentration of ammonia odors within the container."

September 29, 2003: The USDA filed a complaint against Marcus Cook alleging that he had willfully violated the AWA numerous times between December 5, 2000, and February 21, 2003, including by allowing children to handle tigers, using physical abuse and a "cattle prod" to stun a tiger during an exhibition, and failing to handle multiple species—including an injured zebra, a bear cub, tigers, wolves, a cougar, and prairie dogs—in a manner that would not cause stress.

June 12, 2003: The USDA issued Marcus Cook a direct citation for failing to provide two tiger cubs with adequate veterinary care. Both cubs had generalized areas of hair loss, and one cub had lesions around the face and nose. Cook was treating the cubs for ringworm using Lotrimin twice a day but did not have any records on hand regarding this diagnosis from the attending veterinarian. The inspector contacted the attending veterinarian, who stated that he had not examined the cubs. Cook was also cited for failing to maintain complete and accurate records.

June 11, 2003: The attorney general of Texas obtained an emergency court order to stop Marcus Cook's traveling exhibit and froze the assets of both the company and Cook himself. Attorney General Greg Abbott stated that Cook "deliberately downplayed the potential danger of these animals, as well as the group's safety record and trainer qualifications, letting children and adults touch and hold them without regard for disease or possible physical harm." The case was later dismissed due to lack of evidence, but the judge did rule that Cook must post a safety warning at future events.

September 30, 2002: The USDA issued Marcus Cook a direct citation for failing to thaw meat properly to avoid contamination. The meat for the leopard was placed in a plastic container and left to sit at room temperature to thaw. Cook was also cited for failing to keep enclosures clean and in good repair. Multiple cargo containers used for housing the wolves and tigers were lined with wood that was not sealed or able to be sanitized properly. Additionally, the wooden walls in the wolf housing unit were chewed and splintered and could not be cleaned properly. The USDA also cited Cook for failing to maintain a perimeter fence that would protect animals from injury and contain them. The gate of the perimeter fence around the leopard enclosure did not

have a secure latching and locking system.

August 19, 2002: The USDA cited Marcus Cook for failing to have a responsible adult available to accompany USDA officials during an inspection. Cook was also cited for failing to provide all animals with sufficient shelter from inclement weather. Cook had one shelter for two cougars, one shelter for two wolves, and three shelters for seven tigers. Each shelter was only large enough for one animal.

July 22, 2002: The USDA cited Marcus Cook for failing to provide animals with adequate cooling and ventilation to protect them from extreme temperatures. At the time of the inspection, three tigers were kept in an enclosure that the inspector described as "extremely warm and uncomfortable" and two thermometers in the enclosure registered temperatures of 94 degrees and 100 degrees. The inspector noted that all three tigers were panting, and the area had one fan for all three tigers. Cook was also cited for failing to provide these tigers with adequate shelter from the sun. Only a narrow strip of shade, approximately 2 feet wide, was available for the three tigers. Cook was further cited for failing to provide animals with drinking water as often as necessary for their health and comfort. Two cougar cubs, five tiger cubs, and a bear cub were kept inside a trailer with no water, and the animals had last been offered water 12 hours prior.

Cook was issued a repeat direct citation for failing to clean enclosures. The bear enclosure had excessive fecal material, spilled food, a rotten banana peel, and urine. The floor around an enclosure housing tiger cubs would "bubble" when stepped on and urine was also noted in the area, so the inspector noted that the urine had likely seeped between the vinyl tiles to the wooden flooring underneath and saturated the area, causing a strong

ammonia odor in the animal trailer. The USDA also cited Cook for failing to have adequate perimeter fencing. The fence around the zebra pen was approximately 4 feet high rather than the required 6 feet, and the perimeter fence around pens holding three tiger cubs and three wolves was 5 feet high rather than the required 8 feet for potentially dangerous animals. Cook was also cited for failing to maintain the bear cub enclosure in good repair. The cub had torn up the vinyl floor tiles and exposed the subfloor, which was made up of unsealed wood. The bear cub had also reached through the chain link fence and torn the wood trim off the door.

July 20, 2002: Six Flags Over Texas discontinued Marcus Cook's exhibit after a local news station ran an investigative piece about unsafe practices committed by ZooCats Inc. employees. Video footage showed an agitated cub apparently biting a young handler. The report also detailed that Cook's zoology degree—as noted on his resume—was obtained from a Swiss company that fabricated diplomas for a fee. Another report aired by the station earlier that month featured the opinions of two experienced animal handlers who expressed safety concerns about the Six Flags exhibit.

July 5, 2002: The USDA issued Marcus Cook a direct citation for failing to provide prairie dogs with sufficient space. Numerous prairie dogs were kept in cages that did not provide enough space to allow normal postural and social adjustments or adequate freedom of movement and did not have sufficient bedding. Cook was also issued a direct citation for failing to have an adequate number of trained employees on hand to supervise the animals. The inspector noted only one "observer" was present with three wolves, two cougars, one bear, and one tiger. There was no supervisor present, and this observer was not an animal keeper with

species-specific training. Cook was issued another direct citation for failing to handle animals in a way that minimized the risk of harm during public exhibition. During a public exhibit, there was no secondary barrier between the public and the prairie dog exhibit, and in the enclosure housing the tiger, bear, cougars, and wolves, there was less than 2 feet between the water well and the top of the barrier fence. Cook was also issued direct citations for failing to remove excessive fecal matter from cages housing 20 prairie dogs and failing to notify the USDA about housing three tiger cubs and a wolf at an off-site location overnight. Additionally, the USDA cited Cook for failing to have a record of animals on hand or records of acquisition, disposition, or transport of animals available during inspection.

December 5, 2000: The USDA cited Marcus Cook for failing to maintain structurally sound enclosures that adequately contained the animals. At the time of the inspection, the perimeter fence around the tiger enclosure was 4 feet high rather than the required minimum of 8 feet.