UNITED STATES DEPARTMENT OF AGRICULTURE BEFORE THE SECRETARY OF AGRICULTURE

In re:

Lisa Lopez, an individual, d/b/a All Things Wild and White Tiger Discovery, AWA Docket No. 23-J-0008

Respondent.

COMPLAINT

There is reason to believe that the Respondent named herein has violated theAnimal Welfare Act, as amended (7 U.S.C. § 2131 *et seq.*)(AWA or Act), and the regulations thereunder (9 C.F.R. § 1.1 *et seq.*)(Regulations). Therefore, the Administrator of the Animal and Plant Health Inspection Service (APHIS) issues this complaint alleging the following:

JURISDICTIONAL ALLEGATIONS

1. Respondent Lisa Lopez is an individual doing business as All Things Wild and White Tiger Discovery. Respondent's personal address will not be provided in the complaint to protect the Respondent's personal privacy but will be provided to the Hearing Clerk, United States Department of Agriculture, for the purpose of service of this complaint and future documents.

2. At all times material herein, the Respondent was an individual doing business from address 1781 River Oak Dr., Kaufman, TX 75142.

3. At all times material herein, the Respondent operated as an exhibitor as that term is defined in the Act and the Regulations.

4. At all times material herein, the Respondent did not hold an AWA license.

ALLEGED VIOLATIONS

5. From on or about September 19-27, 2020, at the Alabama State Fair, in Birmingham, Alabama, the Respondent operated as an exhibitor, as that term is defined in the Act

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and the Regulations, exhibiting tigers, without holding a valid license, in violation of section 2134 of the Act (7 U.S.C. § 2134) and section 2.1(a)(1) of the Regulations (9 C.F.R. § 2.1(a)(1)).

6. From on or about September 19-27, 2020, at the Alabama State Fair, in Birmingham, Alabama, the Respondent failed to maintain sufficient distance and/or barriers between the tigers and the public during the time that the public was allowed to feed the tigers, in violation of section 2.131(c)(1) of the Regulations (9 C.F.R. § 2.131(c)(1)).

7. From on or about October 2-11, 2020, at the Georgia State Fair, in Hampton, Georgia, the Respondent operated as an exhibitor, as that term is defined in the Act and the Regulations, exhibiting tigers, without holding a valid license, in violation of section 2134 of the Act (7 U.S.C. § 2134) and section 2.1(a)(1) of the Regulations (9 C.F.R. § 2.1(a)(1)).

8. From on or about October 2-11, 2020, at the Georgia State Fair, in Hampton, Georgia, the Respondent failed to maintain sufficient distance and/or barriers between the tigers and the public during the time that the public was allowed to feed the tigers, in violation of section 2.131(c)(1) of the Regulations (9 C.F.R. § 2.131(c)(1)).

WHEREFORE, it is hereby ordered that for the purpose of determining whether the Respondent has in fact violated the Act and the Regulations issued under the Act, this complaint shall be served upon the Respondent. Respondent shall file an answer with the Office of the Hearing Clerk, Room 1031-South Building, United States Department of Agriculture, 1400 Independence Avenue, SW, Washington, DC 20250-9200, in accordance with the Rules of Practice governing proceedings under the Act (7 C.F.R. §§ 1.130-162.13). Failure to file an answer shall constitute an admission of all the material allegations of this Complaint. APHIS requests that this matter proceed in accordance with the Rules of Practice governing proceedings under the Act, and that such order or orders be issued as are authorized by the Act (7 U.S.C. § 2149) and warranted under the circumstances.

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Done at Washington DC this day of 2022 ANTHONY SHEA Date: 2022.11.08 16:29:11 -05'00'

Kevin Shea Administrator Animal and Plant Health Inspection Service

John V. Rodriguez Attorney for Complainant Office of the General Counsel United States Department of Agriculture 1400 Independence Avenue, S.W. Room 2319 South Building Washington, D.C. 20250 (202) 720-2510 john.rodriguez@usda.gov