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March 27, 2024

Dr. Roxanne Mullaney
Deputy Administrator
USDA-APHIS-Animal Care

Via email: [REDACTED]

**Re: Request to Investigate and Take Aggressive Enforcement Action
Against Wyld Jungle, LLC for Over a Year of Blatant Unlicensed
Exhibition**

Dear Dr. Mullaney:

I am writing on behalf of PETA in response to Wyld Jungle, LLC’s (The Wyld Jungle) continued exhibition of regulated species without a license. PETA has submitted two prior complaints to the United States Department of Agriculture (USDA) reporting this apparently unlawful activity and yet, to date, the agency has failed to intervene. PETA strongly urges the USDA to investigate the dangerous and escalating situation developing at The Wyld Jungle—located at [REDACTED]—and take aggressive enforcement action to enjoin this unlicensed exhibition before animals or the public are seriously injured.

The Wyld Jungle is a roadside zoo that officially opened to the public for private tours and direct contact encounters in February 2023. The facility is operated by Michael Holston (Holston), a social media influencer who goes by the name “The Real Tarzann.” As outlined in the attached appendix, The Wyld Jungle does not appear to have an AWA license and could not get one even if it applied. Holston has historically shown a flagrant disregard for the law—having been issued 10 citations by the Florida Fish and Wildlife Conservation Commission in 2018 for unlawfully selling wildlife without a license—and that history makes him ineligible for an AWA exhibitor license from the USDA. Holston continues to demonstrate that he believes the law does not apply to him, not only by failing to obtain the requisite AWA license, but by operating The Wyld Jungle in violation of Riverside County’s zoning code.

Holston lacks sufficient, if any, experience working with the exotics at The Wyld Jungle and does not appear to have hired experienced personnel to help him care for these animals. Holston’s inexperience and reckless behavior has created a dangerous environment for the facility’s employees, the animals, and the public who have engaged in direct contact encounters.

The longer the apparent unlawful exhibition occurring at The Wyld Jungle is allowed to continue unabated, the risk from Holston’s increasingly dangerous conduct will escalate until it reaches a tipping point. Nearly every video and vlog Holston posts to social media is riddled with AWA violations and concerning behavior.

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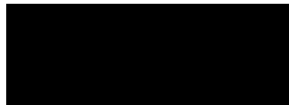
ENTITIES:

- PETA U.S.
- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Switzerland
- PETA Netherlands
- PETA Foundation (U.K.)

Someone is going to be seriously injured at this facility, if they haven't already, unless the USDA intervenes. Any exhibitor who knowingly violates the AWA is subject to criminal penalties of imprisonment up to one year and fines up to \$2,500.¹ Given The Wyld Jungle's long-standing apparent unlawful exhibition and the serious safety concerns at this facility, PETA strongly urges the USDA to take aggressive action by referring this case to the Department of Justice for a federal lawsuit seeking an injunction preventing the facility from exhibiting without a license and to hold Holston criminally liable for any and all illegal conduct occurring at The Wyld Jungle.

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

Very truly yours,



Emily Lively
Counsel, Captive Animal Law Enforcement



Attachments

¹ 7 U.S.C. § 2149(d).

Appendix

I. Background

Michael Holston (Holston) is a social media influencer with 9.3 million followers who previously engaged in strictly online content under the name “The Real Tarzann.”² In January 2018, Holston began posting videos of himself capturing green iguanas from the wild under the guise that he was “rescuing them” during a particularly cold period in Florida.³ The Florida Fish and Wildlife Conservation Commission (FWC) investigated Holston and determined that he was, in fact, *selling* wild green iguanas without a license and was taking advantage of the cold weather, which made the iguanas easier to capture.⁴ The FWC also determined that Holston unlawfully possessed several Burmese pythons, a bateater (Burmese python/reticulated python hybrid), and two green anacondas.⁵

On January 10, 2018, Holston admitted to the FWC that he was selling green iguanas, but claimed he did not know he needed a license to do so.⁶ According to the FWC’s records, however, Holston worked for Underground Reptiles at the time and used their license for the sales, making it highly unlikely Holston was unaware of Florida’s licensing requirements.⁷ The FWC informed Holston that he could not continue to sell wildlife in Florida until he obtained a license.⁸

Not even a week after being told to cease selling wildlife, Holston sold a bateater python to an individual in Tennessee for \$1,800. Holston also admitted to possessing two green anacondas, but claimed he transferred them months earlier, using Underground Reptile’s state license.⁹ Holston, however, could not produce any records documenting the transfer or any acquisition paperwork documenting the source of these animals.

The FWC ultimately charged Holston with ten (10) criminal misdemeanor violations of Florida’s fish and wildlife laws for the unlawful possession and sale of wildlife without a permit and the unlawful and improper transport of reptiles of concern.¹⁰ Holston agreed to enter Miami-Dade’s Pre-trial Diversion program for first-time offenders in lieu of prosecution.¹¹ He initially failed the program after he reportedly left the United States for Australia in December 2018 without completing the program.¹²

Holston later re-entered the first-time offenders program, but his participation was revoked after another brush with the law, resulting in multiple felony charges.¹³ In August 2019, Holston was arrested for

² See @therealtarzann, INSTAGRAM, <https://www.instagram.com/therealtarzann/>; @THEREALTARZANN, YOUTUBE, <https://www.youtube.com/@THEREALTARZANN>.

³ Ex. 1 (FWC Incident Reports).

⁴ *Id.* at 2.

⁵ *Id.*

⁶ *Id.*

⁷ *Id.*

⁸ *Id.*

⁹ *Id.* at 3.

¹⁰ *Id.* at 3-4. During their investigation, the FWC was notified of a suspicious package addressed to Holston at a United States Post Office in Miramar, Florida. *Id.* 1-2, 10. The box was plain white with just the words “Perishable, Handle with Care” written on it, and the box appeared to be moving. *Id.* at 1-2, 7-9. The FWC inspected the package and determined it contained a live green iguana. *Id.* 2, 15.

¹¹ Ex 2 (Miami-Dade court docket).

¹² *Id.*; Ex 3 (Miami Herald article regarding Holston’s prior criminal history).

¹³ See Ex. 3.

assaulting ██████████ of Zoological Wildlife Foundation (ZWF) who were picking up a lion from a wildlife compound owned by Doc Antle.¹⁴ Holston and ██████████ allegedly got into a verbal altercation over comments made on social media, when Holston allegedly began to punch ██████████.¹⁵ When ██████████ got into the driver's seat of his truck, Holston allegedly attempted to continue to assault him through the window and grabbed a rifle out of ██████████ truck.¹⁶ Holston was charged with two felonies—battery and burglary with assault or battery—and misdemeanor battery.¹⁷ Holston again entered Miami-Dade's first-time offenders program and completed it in March 2020, resulting in these and all the FWC charges being dropped.¹⁸

Holston initially applied for an FWC license to sell reptiles of concern in 2018, which was denied because he failed to make his facility available for inspection.¹⁹ In September 2020, Holston applied again, but was denied once because of his history of violating Florida's wildlife laws.²⁰ Two years later, in September 2022, Holston announced that Florida's wildlife regulations were driving him out of the state, and he was looking to relocate and set up his operation elsewhere.²¹

In October 2022, Holston and his new partner Dan Fleyshman²² (Fleyshman) announced they were in the process of constructing an “animal park,” among other “experiences”²³ on a 26-acre ranch in Temecula, California: The Wyld Jungle.²⁴ Right from their announcement video, the two made it clear that they intended to exhibit animals to the public.²⁵ On the same day, Holston posted a thirty-minute vlog tour of the facility's progress on his YouTube channel to advertise that he would be opening The Wyld Jungle in January 2023.²⁶ Later that month, on October 28, 2022, Holston acquired his first regulated exotic species—zebras, zebra/horse hybrids (i.e. zorses), and camels.²⁷ Since, The Wyld Jungle has acquired more than 200 animals, including ostriches,²⁸ greater rhea,²⁹ emus,³⁰ toucans,³¹ a water buffalo,³² a Brahmin bull,³³ and over thirty additional regulated animals.

¹⁴ Ex. 4 (Miami-Dade Police Dept. Arrest Records for Michael Holston). Holston was living at Doc Antle's facility in Miami at this time.

¹⁵ *Id.* at 11-13.

¹⁶ *Id.*

¹⁷ *Id.* at 1.

¹⁸ Ex 20 at 1, 23 (Miami-Dade Court Records for Michael Holston).

¹⁹ Ex. 5 (FWC's Sept. 12, 2018 denial of Holston's Class III license application to sell reptiles of concern).

²⁰ Ex. 6 (FWC's Dec. 7, 2020 denial of Holston's Class III license application to sell reptiles of concern).

²¹ Video 1 (That's It I'm Moving to the Jungle But where? Vlog, Sept. 15, 2022).

²² @danfleyshman, INSTAGRAM, <https://www.instagram.com/danfleyshman/>. Fleyshman is an investor and the owner of a social media agency, [Elevator Studios](#), and has no prior animal-related experience. Ex. 7 (Video 7) (Dan told Cesar Millan that he only ever had dogs, and he only got involved in the project because his wife was obsessed with animals

²³ The full property address is ██████████. The Temecula ranch also offers ATV racing, a sports complex, miniature golf, tactical training courses, a military obstacle course, and shooting houses.

²⁴ Video 2 (Oct. 7, 2022, Instagram video announcing Blacksite Ranch project).

²⁵ *Id.*

²⁶ Video 3 (New Zoo Update Vlog, Oct. 7, 2022).

²⁷ Ex. 11 (Video 16).

²⁸ Video 39. Two of The Wyld Jungle's original three male ostriches were relocated due to aggressive. Ex. 11 (Video 18).

On July 3, 2023, Holston acquired a female ostrich to accompany the remaining male ostrich, Twisty. *Id.* (Video 20).

²⁹ Ex. 7 (Video 7) (first appearance of emus and greater rhea).

³⁰ *Id.*

³¹ Video 40 (Holston's “Largest Toucan in the World” vlog, Sept. 17, 2023).

³² Ex. 11 (Video 26).

³³ *Id.*

II. The Wyld Jungle has blatantly exhibited AWA-regulated animals without a license since at least February 2023.

The AWA prohibits a person from exhibiting regulated species without a valid Class C exhibitor license from the USDA.³⁴ An exhibitor is defined as “any person (public or private) exhibiting any animals . . . to the public for compensation,” including “zoos exhibiting animals whether operated for profit or not.”³⁵ The USDA has determined that “simply . . . making animals available to the public” is sufficient to classify a person as an exhibitor.³⁶

Holston and Fleishman began exhibiting AWA-regulated species to the public over a year ago.³⁷ Holston announced The Wyld Jungle was officially open to the public on February 23, 2023, documenting the facility’s first tour in a vlog on YouTube.³⁸ During the tour, Holston exhibited regulated species to approximately 40 members of the public.³⁹ This included two direct contact encounters with zebras and camels.⁴⁰ Holston brought groups of 5-7 guests inside the zebra enclosure to handfeed Beth (a zebra) and Blackfoot (a zorse).⁴¹ Later, Holston offered a similar experience with the facility’s two camels, Habibi and Naomi, also allowing guests to sit beside one of the camels for photo ops.⁴² During the vlog, guests were interviewed about their favorite parts of the tour to promote the newly opened facility to Holston’s 9.3 million social media followers.⁴³ Holston even asked viewers to help name one of the facility’s new alpacas, stating the winner would receive a “season pass” to The Wyld Jungle.⁴⁴

Because The Wyld Jungle did not have an AWA license, PETA reported this apparent unlawful activity to the USDA in March 2023,⁴⁵ and again in April 2023.⁴⁶ To date, no Class C exhibitor license appears to have been issued for The Wyld Jungle.⁴⁷ Yet, Holston and Fleishman continue to exhibit animals without an AWA license.

Despite more recent attempts by Holston and Fleishman to characterize The Wyld Jungle as a “private sanctuary,”⁴⁸ as outlined extensively below,⁴⁹ the two are clearly exhibiting regulated species to the public without a license in apparent violation of 7 U.S.C. § 2134 and must be held accountable for this ongoing unlawful activity.

³⁴ *Id.* § 2134; 9 C.F.R. § 2.1(a)(7).

³⁵ 9 C.F.R. § 1.1.

³⁶ *In re Lloyd A. Good, Jr.*, 49 Agric. Dec. 156, 174 (1990).

³⁷ Ex. 7 (Video 4).

³⁸ *Id.*

³⁹ *Id.*

⁴⁰ *Id.*

⁴¹ *Id.*

⁴² *Id.*

⁴³ *Id.*

⁴⁴ *Id.*

⁴⁵ Ex. 8 (Mar. 17, 2023, complaint).

⁴⁶ Ex. 9 (Apr. 26, 2023, supplemental complaint).

⁴⁷ PETA has conducted numerous searches under the property address, as well as the names of Holston, Fleishman, and all of their related business entities.

⁴⁸ Videos 41, 42, and 43; Ex. 10.

⁴⁹ In addition to the evidence described herein, Ex. 7 contains additional social media posts that document unlawful public exhibition occurring at The Wyld Jungle facility.

A. Evidence of Continued Exhibition

Since officially opening to the public a year ago, The Wyld Jungle has significantly ramped up its business. The facility now offers a variety of private events and an all-day tour that includes a number of direct contact experiences, which can be booked through their website, <https://wyldjungle.com/>. The facility offered a basic tour package option through early January 2024, but has since removed this from their website's tour offerings, focusing instead on the more expensive all-day tour and private events.⁵⁰ As outlined below, Holston and Fleishman have spent the past year regularly exhibiting animals to the public and heavily marketing their events and tours through social media, celebrity visits, and advertisements.

i. Celebrity Visits During Spring and Summer of 2023

To promote The Wyld Jungle, Holston has hosted and exhibited regulated species to several celebrities, including Cesar Millan, Jalin Turner, and Jay Prehistoric. Because Holston did not have an AWA license, each of these celebrity visits appear to violate 9 C.F.R. § 2.1(a)(1).

Date Posted	Celebrity	Evidence of Exhibition During Visit
05/31/2023	Cesar Millan	Cesar Millan visited The Wyld Jungle and received a full tour of the facility. ⁵¹ He was allowed inside enclosures with regulated species, including ostriches, camels, zebras, zorses, and a number of domestic animals. ⁵² While inside these enclosures, Cesear was permitted to pet, handfeed, and otherwise directly interact with the animals. ⁵³
07/31/2023	Jalin Turner	The Wyld Jungle hosted Jalin Turner, a UFC fighter, and he was allowed to participate in handfeeding zebras and zorses. ⁵⁴ He pet Lulu (a water buffalo) and Buffalo Bill (a Brahmin bull) through the enclosure's fencing. ⁵⁵ Holton mentioned that, while viewers didn't see it, Jalin was allowed inside the ostrich enclosure. ⁵⁶
08/09/2023	Jay Prehistoric	Jay Prehistoric, operator of Prehistoric Pets, visited The Wyld Jungle and participated in a full facility tour guided by Holston and Fleishman. ⁵⁷ Jay Prehistoric also participated in a handfeeding encounter with Beth (zebra) and Blackfoot (zorse).

ii. Basic Tour Conducted on or around October 1, 2023

Through early January 2024, The Wyld Jungle offered a "Basic Tour" package for \$99 that provided guests an approximately two hour tour of the facility and the "chance to get up close and personal with some of the world's most amazing animals."⁵⁸ Holston documented one of these private tours for his millions of followers in a YouTube vlog posted on October 1, 2023.⁵⁹ Holston and his wife, Laura Leon (Leon), conducted the tour for two members of the public, and Holston noted that this tour was the first

⁵⁰ See Ex. 12 (Screenshot of The Wyld Jungle website's basic tour package offering).

⁵¹ Ex. 7 (Video 7).

⁵² *Id.*

⁵³ *Id.*

⁵⁴ *Id.* (Video 8).

⁵⁵ *Id.*

⁵⁶ *Id.*

⁵⁷ *Id.* (Video 10).

⁵⁸ See Ex. 12.

⁵⁹ Ex. 7 (Video 12).

one of the day—indicating that more were scheduled.⁶⁰

During this tour, Holston and Leon brought a pair of guests all around The Wyld Jungle to view and interact with all the facility’s regulated species.⁶¹ The guests were allowed inside enclosures for handfeeding or other direct contact experiences with zebras, zorses, ostriches, camels, emus, greater rhea, alpacas, Buffalo Bill (Brahmin bull), Lulu (water buffalo), and other domesticated animals.⁶² Because Holston did not have an AWA license, this tour and any subsequent tours appear to violate 9 C.F.R. § 2.1(a)(1).

iii. Jungle Maniacs Tour Conducted on or around November 3, 2023

The Wyld Jungle continues to offer an all-day experience known as the “Junge Maniacs” package for \$499.⁶³ The package is advertised for guests who want to get to know “what it’s like to be Tarzann [Holston] for the day,” and provides guests the opportunity to spend a full day feeding the animals, performing husbandry tasks, and participating in other animal experiences.⁶⁴ As Holston explains on a podcast with Fleishman, the guest(s) come to The Wyld Jungle at 8 o’clock in the morning, and he “put[s] [them] to work.”⁶⁵

Holston documented the first Jungle Maniacs tour in a vlog posted to YouTube on November 3, 2023.⁶⁶ During this all-day experience, Holston provided the guest with a complete tour of The Wyld Jungle, which included viewing the facility’s regulated species.⁶⁷ The guest also participated in a number of direct contact encounters with exotics, including toucans, camels, zebras, zorses, ostriches, greater rhea, and emus.⁶⁸ Because Holston did not have an AWA license, this tour and any subsequent tours appear to violate 9 C.F.R. § 2.1(a)(1).

iv. Birthday Parties and Other Events Held at The Wyld Jungle in 2023 and 2024

In addition to tours, The Wyld Jungle also hosts birthday parties and other private events.⁶⁹ The facility can host up to 50 people for private events⁷⁰ and also offers wedding packages where a donkey or zebra can walk you down the aisle.⁷¹ The below table reflects known events that The Wyld Jungle has hosted where regulated species were exhibited to the public. Because Holston did not have an AWA license, these events and any subsequent events appear to violate 9 C.F.R. § 2.1(a)(1).

⁶⁰ *Id.*

⁶¹ *Id.*

⁶² *Id.*

⁶³ *Jungle Maniacs*, THE WYLD JUNGLE, <https://wyldjungle.com/products/jungle-maniacs>; see also Ex. 13 (Screenshot of The Wyld Jungle’s Jungle Maniac’s package offering).

⁶⁴ *Id.*

⁶⁵ Video 44.

⁶⁶ Ex. 7 (Video 14).

⁶⁷ *Id.*

⁶⁸ *Id.*

⁶⁹ *Events & Birthday Parties*, THE WYLD JUNGLE, <https://wyldjungle.com/products/events-birthday-parties>; see also Ex. 14 (Screenshot of The Wyld Jungle’s private event offerings).

⁷⁰ *Id.*

⁷¹ Video 45.

Video	Date Posted	Evidence of Exhibition
Video 6	05/28/2023	Russell and Ciara Wilson hosted their son's birthday party at The Wyld Jungle. Holston gave the children tours of all the animals at the facility, and the children were allowed to participate in direct contact encounters with the camels and domesticated animals.
Video 9	08/07/2023	Video of large group of guests during a visit to The Wyld Jungle for a private event.
Video 11	09/11/2023	Video documented a large group of likely 100+ people visiting The Wyld Jungle for Fleishman's birthday party. Regulated species were seen being exhibited at the event.
Video 15	02/03/2024	Video of Fleishman's 100 Million Master Experience event hosted at The Wyld Jungle, with the event tent set up beside several animal enclosures. Video also showed Fleishman exhibiting some of the facility's domesticated animals at Day 1 of the event hosted at an off-site location, California Ranch Company Barn.

B. Marketing Campaign for Tours and Events at The Wyld Jungle

Throughout 2023, Holston and Fleishman heavily marketed that The Wyld Jungle was open and that private tour packages were available for booking. Given their extensive marketing campaign, it is likely that Holston and Fleishman were exhibiting at The Wyld Jungle more frequently than social media evidence reflects. Neither Holston, Fleishman, nor The Wyld Jungle have an AWA license, and thus any exhibition of regulated species to the public appears to violate 9 C.F.R. § 2.1(a)(1).

Video	Date Posted	Media Platform	Evidence of Marketing for Tours at The Wyld Jungle
Ex. 15	04/21/2023	Instagram	Advertisement by Dan Fleishman that the facility has a fulltime food truck for guests that are there for private events and to see the animals.
Video 46	05/18/2023	Instagram	Brief video of visitors sitting beside and taking pictures with Habibi and Naomi (camels). Caption advertised that members of the public can cuddle with a camel if they visit The Wyld Jungle.
Video 47	09/05/2023	Instagram	Video of Holston announcing that The Wyld Jungle is open for the public to come visit and promoting the available, tours, events, birthday parties, and personal animal experiences.
Video 41	10/19/2023	Instagram	Advertisement for The Wyld Jungle facility. Holston and Fleishman claimed the facility is not open to the public, but simultaneously discuss how they offer private tours where Holston will show guests around to see the 188 animals onsite.
Video 42	11/26/2023	Instagram	Advertisement by Holston and Fleishman promoting that The Wyld Jungle is open for weddings, private events, and tours to feed the animals. Fleishman attempted again to claim the facility is not open to the public, but immediately followed up by showing viewers two electric trucks that they use to give tours of the facility to the public.
Video 48	12/24/2023	Instagram	Holston and Fleishman with several of the facility's animals asking viewers to come visit in 2024 and that they can book their tours at wyldjungle.com.
Video 49	12/27/2023	Instagram	Advertisement posted to social media for tours and animal encounters at The Wyld Jungle. Holston and Fleishman were going around the property and interacting with the animals to show what guests can see and do when they visit the facility.

In October 2023, Holston and Fleishman expanded their promotional marketing to include several advertisement pieces published on online media platforms.⁷² Each of these paid-for advertisements are misleading, making false claims that The Wyld Jungle is a “sanctuary”⁷³ and a “vital oasis of hope for

⁷² Ex. 16 (Celebrating Special Occasions at The Wyld Jungle article); Ex. 17 (Get to Know The Real Tarzan's The Wyld Jungle article); Ex. 18 (The Wyld Jungle on Wildlife Conservation and Adventure article).

⁷³ Ex. 16.

the planet’s most endangered inhabitants.”⁷⁴ The Wyld Jungle is not a sanctuary and it does not house any endangered species. Holston operates a roadside zoo with little to no experience in how to care for the animals he exploits.

As the above evidence demonstrates, The Wyld Jungle is in full swing and exhibiting regulated species to the public on a regular basis without an AWA license. When bad actors, like Holston and Fleishman, operate in violation of the AWA and the USDA does nothing, it sends a message that this type of behavior is condoned. Given their social media following—a combined 9.7 million followers—this is even more likely in this case with Holston and Fleishman promoting their conduct to viewers who will assume it is legal.⁷⁵ The USDA must step in and hold Holston and Fleishman accountable for their apparent unlawful conduct, which will continue to escalate the longer they are allowed to operate outside the bounds of the law.

III. Holston, Fleishman, and The Wyld Jungle are ineligible for an AWA license.

Holston and Fleishman cannot simply cure the blatant unlawful conduct described above because neither are eligible for a Class C exhibitor license. Holston has a history of violating state wildlife laws and is unfit to be a licensed exhibitor under the AWA. Similarly, Riverside County issued Fleishman a Notice of Violation for constructing and operating The Wyld Jungle in violation of the local zoning code, which has yet to be cured. As such, regardless of who applies to the USDA for an exhibitor license, the application must be denied because The Wyld Jungle cannot lawfully operate at this location.

A. Holston’s History of Legal Violations in Florida

The USDA must deny any application for an AWA license if the applicant has violated any state laws or regulations “pertaining to the transport, ownership, neglect, or welfare of animals, or is otherwise unfit to be licensed.”⁷⁶ In 2018, the FWC charged Holston with ten (10) misdemeanor citations for the unlawful possession, sale, and transport of state-restricted reptiles.⁷⁷ While the criminal charges were dropped after Holston completed a pre-trial diversion program,⁷⁸ the FWC still found that Holston had violated state law and denied his application for a license to sell reptiles because of these violations.⁷⁹ This history of violations of state law involving the possession and transportation of animals warrants denial of any AWA license application submitted by or involving Holston. Further, despite completing a diversion program designed to teach him how to “avoid further involvement with the criminal justice system,”⁸⁰ Holston continues to demonstrate a flagrant disregard for the law by again failing to obtain the requisite licensure for his activities. His continued blatant violation of basic licensing requirements demonstrates he is unfit to be an exhibitor under the AWA.

⁷⁴ Ex. 17.

⁷⁵ See Ex. 7 (Video 7) (“You don’t need no permits in California for camels or zebras. So, you can have a zebra and a camel tomorrow if you want.”)

⁷⁶ 9 C.F.R. § 2.11(a)(7).

⁷⁷ Ex. 2.

⁷⁸ Ex. 19 at 1 (Miami-Dade court records for Holston).

⁷⁹ Ex. 6.

⁸⁰ Miami-Dade County’s Misdemeanor and Felony [Pre-Trial Diversion Program](#).

B. Riverside County Zoning Code Violations

The USDA must deny any application for an exhibitor license if the applicant is or would be operating in violation of any local laws.⁸¹ According to Riverside County zoning officials, Fleishman and The Wyld Jungle are currently operating in violation of local zoning regulations.⁸² The Wyld Jungle possesses a number of large mammal species, which classifies the facility as a menagerie in Riverside County.⁸³ Menageries are prohibited in the Wine-Country Equestrian Zone, where The Wyld Jungle is located, which means it cannot legally operate at its current location.⁸⁴

On November 10, 2022, Riverside County opened a code enforcement case for non-compliance against Fleishman and several of his business entities, including The Wyld Jungle.⁸⁵ After months of Fleishman giving enforcement officers the runaround about scheduling an initial inspection, the county filed for an inspection warrant on March 30, 2023⁸⁶ and finally inspected the property in April.⁸⁷ Following the property inspection, Riverside County served Fleishman a Notice of Violation and Order to Abate Public Nuisance.⁸⁸ The county ordered Fleishman to discontinue use of the property as a roadside zoo, among other unlawful uses, and seek Riverside County Planning Department approval.⁸⁹ Fleishman was ordered to bring the Temecula property into compliance by May 10, 2023, a deadline which he failed to meet.⁹⁰

To date, The Wyld Jungle continues to operate in violation of the Riverside County zoning code. Until these zoning issues are resolved, Fleishman and The Wyld Jungle are ineligible for a Class C license to exhibit regulated species.

IV. The USDA should deny Holston an AWA license because he lacks experience working with the species at The Wyld Jungle, which has created a significant public safety risk.

The USDA may deny a license for any applicant who is not in compliance with the AWA.⁹¹ All licensees under the AWA “must demonstrate adequate experience and knowledge of the species they maintain,”⁹² which Holston cannot do.

Holston is a social media influencer masquerading as a self-titled “animal expert.” As Holston, himself, admits, he lacks any meaningful experience and is just learning how to work with the regulated species at The Wyld Jungle⁹³— sometimes even going as far as asking his followers how he should handle

⁸¹ 9 C.F.R. § 2.11(a)(6).

⁸² Ex. 20 (Notice of Violation, Apr. 25, 2023); *see also* Ex. 21 (Code Enforcement Case # CVZO221174 Updated Records, Sept. 21, 2023).

⁸³ R.C.C. § 17.04.120(a).

⁸⁴ *Id.* § 17.142.070(A)-(C).

⁸⁵ Ex 22 at 1.

⁸⁶ *Id.* at 7.

⁸⁷ Ex. 21 at 8.

⁸⁸ Ex. 20.

⁸⁹ *Id.*

⁹⁰ *Id.*

⁹¹ 9 C.F.R. § 2.11(a)(2).

⁹² *Id.* § 2.131(a).

⁹³ Ex. 11 (Video 16) (Holston asked owner of Zebras R Us numerous animal care questions that show he has no prior experience working with zebras); *Id.* (Video 17) (“Forgive me if I’m doing this wrong. This is my first time walking a zorse on a leash.”).

certain situations.

Comment down below what you guys would have done in this situation. I would love to hear you guys' thoughts and your thought process on this. If you guys were in my position, what would you guys do? What should we do going forward when we have animals that aren't, you know, fully fitting into our friendly environment? Should we separate them? Should we build another spot away from everybody where they can calm down? Should we . . . should I get more animals and put them in there and risk having five mean ostriches. **I don't know guys, so you know. I'm also new to all this stuff . . . [T]his is a whole learning process.**⁹⁴

Holston's inexperience is obvious in his interaction with these animals on social media. PETA has compiled the attached chart (Exhibit 11), which documents 29 instances where Holston has demonstrated a lack of experience and poor handling skills when working with the regulated species at The Wyld Jungle. Wildlife veterinarian, Dr. Mason Payne, reviewed some of the most concerning video content and opined that the situation at The Wyld Jungle is extremely dangerous. He advised that Holston's overall behavior reflects that he appears to be a complete amateur in animal handling and does not appear to have received any proper training. In his opinion, Holston uses his strength to try and out muscle the animals, and it is only a matter of time before someone is severely injured, maimed, or killed at the facility.

Holston's care of the ostriches at The Wyld Jungle in particular is emblematic of his complete lack of experience, and according to Dr. Payne, is the most egregious demonstration of his poor handling. In 8 videos, Holston knowingly agitated the ostriches, prompting aggressive behaviors.⁹⁵ Dr. Payne opines that this harassing behavior serves no purpose other than to generate views on social media. In Dr. Payne's expert opinion, Holston's behavior was stressful for the ostriches, extremely life-threatening for Holston, and any ensuing aggression could potentially be misdirected towards other flockmates.

Dr. Payne advised that ostriches are dangerous animals, and extreme care must be taken when working with them. One kick from an ostrich could cause serious lacerations that may result in a person bleeding out or being disemboweled. Holston appears to recognize these risks, having told his followers that one kick from an ostrich could blow someone's ACL.⁹⁶ Yet, he intentionally disregarded these risks and provoked the ostriches into charging at him and narrowly missed being kicked on numerous occasions.⁹⁷ Holston typically interacts with the ostriches alone or with just a cameraman, which Dr. Payne opined is an improper technique and dangerous on its own accord. According to Dr. Payne, handling ostriches is generally a two-person job. If only one person is available, the ostrich should be contained in a separate area while the staff member performs their duties. Any time the ostrich cannot be separated, two trained employees at minimum should be present for protection—a precaution that Holston has not demonstrated in his content to date.

⁹⁴ *Id.* (Video 18) (emphasis added).

⁹⁵ *Id.* (Videos 18, 23, 25, 33-37).

⁹⁶ *Id.* (Video 23).

⁹⁷ *Id.* (Videos 23, 33-37).

According to Holston, at least four employees have been injured by ostriches at The Wyld Jungle,⁹⁸ indicating that the facility is severely lacking in proper safety protocols and training. ██████████ (known as “██████████” in Holston’s videos), the facility’s security guard, was reportedly nearly hospitalized by one of the ostriches when he found himself cornered inside their enclosure.⁹⁹ The ostrich kicked him and sliced through his pants, just narrowly avoiding a serious laceration.¹⁰⁰ ██████████’s role at the facility is to provide security. He has no experience with exotic animals but is still allowed inside enclosures to interact with them. This extends to other inexperienced employees, including two young men—██████████ and ██████████—who Holston said take care of the animals while he travels to film content internationally.¹⁰¹ ██████████’s only prior animal-related experience was keeping venomous snakes as pets, which Holston told viewers he believed qualified them for anything.¹⁰²

Holston also harasses and provokes the camels—Habibi and Naomi—frequently wrestling with and encouraging them to play bite him,¹⁰³ which Dr. Payne opined is dangerous and lacks any enrichment benefit. In Dr. Payne’s opinion, wrestling only encourages aggressive behavior with humans, such as biting and pushing, and could result in injury to Holston or the public during direct contact. Holston appears aware of the danger—having told viewers this is an unsafe way to interact with camels and could cause aggression when they’re older¹⁰⁴—but continues to engage in this reckless conduct anyway.¹⁰⁵

Holston’s inexperience extends to even less dangerous domesticated animals who are traditionally much easier to handle than exotics, such as llamas and alpacas. For example, one of the facility’s alpacas, Elvis, displayed significant signs of aggression with both conspecifics¹⁰⁶ and employees,¹⁰⁷ which Holston initially wrote off as just a “bit of a personality issue” despite being bit by Elvis himself.¹⁰⁸ At least four employees were bitten by Elvis.¹⁰⁹

Holston’s inexperience is particularly dangerous because he operates The Wyld Jungle with an influencer mindset and treats the animals there like “props,” calling them his “main characters.” Rather than focusing on these animals’ welfare, Holston harasses them and engages them in reckless stunts that serve no purpose other than to create viral content for his 9.3 million social media followers. This not only places Holston and his employees at risk of serious injury or death, but also creates a dangerous situation for the public who can pay to have direct contact with these same animals.

Many of the regulated species at The Wyld Jungle are exhibiting aggressive tendencies, partly as a result of Holston’s encouragement of this behavior to create social media content. Despite this, Holston allows members of the public to engage in direct contact with these animals. During these encounters, he is generally more focused on filming content, taking his eyes off the animals, and does not appear to ever

⁹⁸ *Id.* (Video 18).

⁹⁹ *Id.*

¹⁰⁰ *Id.*

¹⁰¹ *Id.* (Video 19).

¹⁰² *Id.*

¹⁰³ *Id.* (Video 18, 31); *see also* Ex. 7 (Video 7).

¹⁰⁴ Ex. 11 (Video 18).

¹⁰⁵ Ex. 7 (Video 7). The camels started to kick because Holston was playing soccer with them.

¹⁰⁶ Elvis attacked his female co-specific so much that her skin began to show. Ex. 11 (Video 18).

¹⁰⁷ Elvis injured four of the facility’s employees before being rehomed. *Id.* An employee named ██████████ was bitten by Elvis while trying to corral some of the facility’s goats, and Elvis would not let go. *Id.* Another employee ██████████, was also bitten, leaving a giant bruise. *Id.* On another occasion, Elvis jumped up and bit an employee, ██████████, on the shoulder. *Id.*

¹⁰⁸ *Id.* (Video 23).

¹⁰⁹ *Id.* (Video 18).

have another trained employee with him. He lacks any direct control over the animal and often completely disregards when the animals begin displaying concerning behavior during encounters, for example:

- An ostrich pecked Cesar Millan and tried to grab the sweatshirt hanging over his arm. Holston did nothing.¹¹⁰
- Holston tapped the beak of an ostrich to harass and agitate him while a guest stood right beside him.¹¹¹
- A guest became sandwiched between and pinned to the fence by the camels, each trying to get to the feeding bucket in his hand. Holston made no move to help.¹¹²
- A guest could be heard saying “[t]hat’s my finger. That’s not a sweet potato” while handfeeding camels.¹¹³
- Holston grabbed an ostrich’s beak and held on to it, saying “I got your nose.” A guest was standing right beside him while he was agitating the ostrich.¹¹⁴
- A guest held up his hand for an ostrich to peck, and Holston did not correct him.¹¹⁵
- A guest allowed in with greater rhea and emus alone, while Holston was in an entirely different enclosure.¹¹⁶
- A camel bit a member of the public’s ear.¹¹⁷

As the USDA highlighted in an inspection report on Thomas Edmonds, “animal[s] must be handled so there is minimal risk of harm to the animal and to the public” during exhibition, and “[i]f there is direct contact with dangerous animals[,] the keepers must have direct control and adequate knowledge and experience with those animals.”¹¹⁸ However, much like Edmonds, Holston is a “learn as he goes” exhibitor, whose lack of experience poses a serious risk of harm to the animals, the employees, and the public. At least four employees have been seriously hurt, and members of the public are likely to be as well if they haven’t been already. PETA strongly urges the USDA to act proactively in this case and not simply hand Holston a permit to correct his unlicensed exhibition. Holston lacks sufficient knowledge and experience working with the exotic animals at The Wyld Jungle and is, therefore, unqualified to be a licensed exhibitor under the AWA. To allow him to continue to exhibit animals would place the animals and the public at serious risk, and the USDA would find themselves attempting to manage yet another Thomas Edmonds.

¹¹⁰ Ex. 7 (Video 7).

¹¹¹ *Id.* (Video 12).

¹¹² *Id.*

¹¹³ *Id.*

¹¹⁴ *Id.* (Video 14).

¹¹⁵ *Id.*

¹¹⁶ *Id.*

¹¹⁷ Video 50.

¹¹⁸ Ex. 23 at 6.

Conclusion

Holston and Fleishman have blatantly exhibited regulated species without a license since at least February 2023. Any exhibitor who knowingly violates the AWA is subject to criminal penalties of imprisonment up to one year and fines up to \$2,500.¹¹⁹ In light of the extensive evidence detailed above, PETA strongly urges the USDA to take aggressive enforcement action against The Wyld Jungle immediately before someone is seriously hurt. Holston is becoming increasingly dangerous the longer the USDA does nothing to address his conduct. The USDA needs to act proactively in denying this facility a license to avoid having another Joe Exotic, Jeff Lowe, or Thomas Edmonds on its hands. When facilities like The Wyld Jungle intentionally circumvent the AWA, there must be meaningful consequences. PETA respectfully requests the USDA investigate the apparent unlawful exhibition occurring at The Wyld Jungle and hold Holston and Fleishman fully accountable for any and all illegal conduct.

¹¹⁹ 7 U.S.C. § 2149(d).