

July 23, 2025

Sarah Helming  
Deputy Administrator, Animal Care  
Animal and Plant Health Inspection Service  
U.S. Department of Agriculture

Via email: [REDACTED] [ac.complaints@usda.gov](mailto:ac.complaints@usda.gov)

**Re: Request to Investigate Sugriva Co., LLC., for Circumvention  
of Doc Antle's AWA License Application Denial and  
Apparent Violations of the Animal Welfare Act**

Dear Deputy Administrator Helming:

I am writing on behalf of PETA to request that the United States Department of Agriculture (USDA) investigate Sugriva Co., LLC., d.b.a, "Myrtle Beach Safari" (license no. 56-C-0280) and terminate its Animal Welfare Act (AWA) for the following apparent violations of the AWA, described in greater detail in the attached appendix:

- Circumvention of Antle's license application denial by allowing Antle to continue to operate MBS and exhibit animals at MBS under Sugriva's license (9 C.F.R. §§ 2.1(a)(1); 2.11(a)(2),(6); 2.11(d); 2.12);
- Allowing the public to freely climb on, ride, grab, and jump off of elephant Bubbles when she is not under direct control with no responsible employee present during exhibitions (*Id.* §§ 2.131(c)(1), (d)(1), (d)(2), (d)(3));
- Allowing the public to freely pick up and hold chimpanzee Tara, permitting Tara to hold onto children's necks and shoulders and come face to face with children (*Id.* §§ 2.131(c)(1), (d)(1), (d)(2));
- Allowing the public to freely interact with elephant Bubbles and chimpanzee Tara without meaningful restrictions, placing the animals' health in serious danger (*Id.* §§ 2.131(c)(1), (d)(1), (d)(2), (d)(3)).

The USDA's inconsistent enforcement of the AWA and apparently preferential treatment of Antle and Sugriva enabled them to continue to operate in violation of the AWA.

Accordingly, PETA respectfully requests that the USDA (1) terminate Sugriva's license for apparent circumvention of USDA regulations and apparent handling violations, (2) deny future applications for AWA

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licenses from Antle, York, or similarly affiliated persons at MBS, (3) refer this case to the DOJ for serious danger violations, as required by § 2159(A).

Thank you for your time and attention to this important matter.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Danielle Palermo', written in black ink.

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Danielle Palermo  
Counsel, Captive Animal Law Enforcement  
PETA Foundation

cc: [lawenforcement@fws.gov](mailto:lawenforcement@fws.gov); [AnimalWelfare.ENRD@usdoj.gov](mailto:AnimalWelfare.ENRD@usdoj.gov)

Attachments

## Appendix

### I. Introduction

Bhagavan Antle (a.k.a. “Doc Antle”) owned and exhibited animals at the Myrtle Beach Safari (“MBS”) through his LLC, The Institute for Greatly Endangered and Rare Species (“T.I.G.E.R.S.”).<sup>1</sup> On June 3, 2022, the FBI arrested Antle for suspicion of federal wildlife trafficking and money laundering crimes.<sup>2</sup> On November 6, 2023, Antle pleaded guilty to conspiracy to violate the Lacey Act, in violation of 18 U.S.C. § 371, and conspiracy to commit money laundering, in violation of 18 U.S.C. § 371.<sup>3</sup> On July 8, 2025, Antle was sentenced to twelve months and one day of imprisonment and was ordered to pay a \$55,000 fine, serve three years of supervised release, and forfeit three chimpanzees and more than \$197,000 to the U.S. government.<sup>4</sup> Additionally, on June 16, 2023, a jury in the Circuit Court of Fredrick County found Antle guilty, convicting him of conspiracy to sell an endangered species.<sup>5</sup> These felony convictions disqualified Antle from holding an Animal Welfare Act (AWA) license.<sup>6</sup>

During these cases, Antle plotted to keep MBS operating. While Antle was in custody, China York, Antle's romantic partner, created Sugriva Co. LLC (AWA License No. 56-C-0280) (“Sugriva”).<sup>7</sup> Antle sought to convey MBS to Sugriva.<sup>8</sup> China York was professionally connected to Antle prior to the offloading of MBS as a member of Antle’s nonprofit organization, “Preservation Station” (d.b.a. “Rare Species Fund”), and lived and worked at MBS.<sup>9</sup> On June 11, 2022, York informed the United States Department of Agriculture (USDA) of the “change of ownership of T.I.G.E.R.S.” i.e., MBS.<sup>10</sup> On June 17, 2022, Sugriva applied for a Class C Exhibitor license.<sup>11</sup> Throughout Sugriva’s USDA application process, the USDA raised questions about whether to license Sugriva or hold the application, as Antle’s involvement at MBS remained unchanged.<sup>12</sup> However, on September 21, 2022, Sugriva passed its license inspection,<sup>13</sup> and its license was issued with USDA stating it did not have “a case for circumvention since Antle hasn’t been convicted or plead guilty to

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<sup>1</sup> Ex. 1, T.I.G.E.R.S., Amended Articles of Organization, South Carolina Secretary of State (Feb. 14, 2011).

<sup>2</sup> Ex. 2, Executed Arrest Warrant, U.S. v. Mahamayavi Antle, No 4:22-mj-23-MCRI (D. S.C. June 1, 2022).

<sup>3</sup> Ex. 3, Guilty Plea, U.S. v. Bhagavan Mahamayavi Antle, No. 4:22-cr-00580-JD-1 (Nov. 6, 2023).

<sup>4</sup> Ex. 4, Judgment in a Criminal Case, U.S. v. U.S. v. Bhagavan Mahamayavi Antle, No. 4:22-cr-00580-JD-1 (July 10, 2025); Ex. 5, Preliminary Order of Forfeiture as to Bhagavan Mahamayavi Antle, U.S. v. Bhagavan Mahamayavi Antle, No. 4:22-cr-00580-JD-1 (July 10, 2025).

<sup>5</sup> Ex. 6, Bhagavan Kevin Antle v. Commonwealth of Virginia, No. 1906-23-4 (Feb. 4, 2025) (upholding the two counts of conspiracy to sell or purchase an endangered species and reversing the two counts of purchasing an endangered species).

<sup>6</sup> Ex. 7, USDA AWA License Denial Letter (Jan. 4, 2024) (“denying the application based on sections 2133 and 2151 of the AWA (7 U.S.C. §§ 2133, 2151) and section 2.11(a)(7) of the AWA Regulations (9 C.F.R. § 2.11(a)(7))”).

<sup>7</sup> Ex. 8, The Government’s Motion to Modify Bond, U.S. v. Antle, No. 4:22-cr-00580, at \*1 (D. S.C. Aug. 31, 2022).

<sup>8</sup> Ex. 9, Letter from Michelle Pardo, Duane Morris, to Dr. Elizabeth Goldentyer, Deputy Administrator, APHIS Animal Care, Sugriva Co LLC Application for Class C License (July 21, 2022); *see also* Ex. 8.

<sup>9</sup> Ex. 10, Preservation Station, Inc., d.b.a. Rare Species Fund, Form 990 (2020). Preservation Station/Rare Species Fund is suspended in Florida and South Carolina; Ex. 8.

<sup>10</sup> Ex. 11, USDA FOIA Response to PETA Request for Records Relating to Sugriva Co LLC’s USDA Application, at p. 37 (Email from China York to APHIS-AnimalCare and Carla R. Thomas, APHIS (June 11, 2022)).

<sup>11</sup> *Id.* at 27-33 (USDA Application for License, Sugriva Co LLC (June 17, 2022)).

<sup>12</sup> *See. e.g. Id.* at p. 1-26.

<sup>13</sup> Ex. 12, USDA Inspection Report, Sugriva Co LLC (Customer ID: 6013483) (Sept. 21, 2022).

anything” and that the USDA’s Office of General Counsel believed that there was not “a case for denial” of Sugriva’s license.<sup>14</sup>

On January 4, 2024, Antle applied for and was denied a USDA license as a result of pleading guilty to conspiracy to violate the Lacey Act and conspiracy to commit money laundering.<sup>15</sup> Despite this denial, USDA has apparently not revisited a case for circumvention regarding Sugriva’s license. In connection with Antle’s federal case, Meredith “Moksha” Bybee—Antle’s coconspirator, codefendant, romantic partner, and MBS employee—pleaded guilty to violating the Endangered Species Act by knowingly delivering, receiving, carrying, transporting, and shipping two juvenile cheetahs, an endangered species, at Antle’s direction.<sup>16</sup> Antle reportedly controlled the facility and his employees’ actions.<sup>17</sup>

Antle is still inextricably intertwined with MBS, so much so that he leads animal encounters, exhibits under the MBS license, and made statements during his sentencing hearing that demonstrate that there is no meaningful separation between Antle and MBS. The overwhelming evidence shows that essentially nothing has changed at MBS since Sugriva was issued a license. Antle remains in charge.

## II. Sugriva’s license is an apparent attempt to circumvent Antle’s AWA license denial and USDA regulations, which require exhibitors to hold a valid license.

The AWA defines an “exhibitor” as “any person (public or private) exhibiting any animals, which were purchased in commerce or intended distribution of which affects commerce, or will affect commerce, to the public for compensation, as determined by the Secretary.” 7 U.S.C. § 2.132(h). The USDA has determined that a person acts as an exhibitor “simply by making animals available to the public.”<sup>18</sup> The AWA regulations prohibit a person from operating as an exhibitor without a valid license. 9 C.F.R. § 2.1(a)(1). The USDA may not issue a license “under circumstances that the Administrator determines would circumvent any order . . . denying a license or disqualifying a person from engaging in activities under the Act.” *Id.* § 2.11(d). The regulations also authorize the USDA to terminate a license if the licensee “is not in compliance with the Act or any of the regulations or standards,” or “is or would be operating in violation of circumvention of any Federal, State, or local laws.” *Id.* §§ 2.11(a)(2),(6); 2.12.

In 2024, the USDA denied Bhagavan Antle’s application for a Class C Exhibitor license under the AWA, with the agency determining Antle was “unfit to be licensed and that the issuance of a license to you would be contrary to the purposes of the Act.”<sup>19</sup> However, he is apparently circumventing AWA regulations by continuing to exhibit animals at MBS under York’s license. These activities constitute circumvention of the USDA’s denial of an AWA license to Antle and

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<sup>14</sup> Ex. 11, at p. 8 (Email from Robbert Gibbens, APHIS, to Jeffery A. Shepherd et. al., APHIS (Oct. 13, 2022)).

<sup>15</sup> Ex. 7.

<sup>16</sup> Ex. 13, Guilty Plea, U.S. v. Bybee, No. 4:22-cr-00580-JD-3 (July 14, 2022).

<sup>17</sup> Ex. 14, The Government’s Sentencing Motion, U.S. v. Antle, No. 4:22-cr-00580, at \*FN 26 (D. S.C. June 24, 2025) (“Bybee stated that she was never allowed to have her own financial accounts. She did not receive a salary. Antle paid for her expenses and paid her taxes. The income she generated from social media also went to Antle, and until she temporarily left the facility, she was unaware of the amount she was making from social media.”).

<sup>18</sup> *In re Lloyd A. Good, Jr.*, 49 Agric. Dec. 156, 174 (1990).

<sup>19</sup> Ex. 7.

demonstrate that York is unfit to hold an AWA license, such that the Sugriva license is contrary to the purposes of the Act.

Despite York's claims that Antle "will have no interest in Sugriva's USDA license,"<sup>20</sup> Antle's physical presence at MBS, leadership and involvement with animal exhibitions and public encounters, interactions with employees, and statements demonstrate that there is no meaningful separation between Antle and Sugriva. Brittany Peet, General Counsel, Captive Animal Law Enforcement for the PETA Foundation, attended Antle's sentencing hearing on July 8, 2025. During the hearing, Antle's attorney represented that Antle *himself* currently holds a USDA license, a veterinarian referred to herself as Antle's veterinarian and told the court that she works closely with Antle during her visits to MBS, and Antle himself discussed how MBS would suffer if he spent time in prison due to his level of involvement in operating the facility and managing the animals, including stating that he is the only person who is able to execute Bubble the elephant's exercise program. These statements demonstrate that Antle clearly has an interest in Sugriva's USDA license, as he has continued to use Sugriva's license as if it were his own.

Antle is ostensibly operating business as usual at MBS, as documented by the following videos and photos posted to social media:

- **July 17, 2025:** Antle is filming a child riding Bubbles in the water. Antle can be heard telling the child to touch Bubbles' nose and telling the child "good job" after they jump from Bubbles.<sup>21</sup>
- **June 29, 2025:** Antle is shown sitting behind a woman while they ride Bubbles in the river.<sup>22</sup>
- **June 29, 2025:** Antle is shown leading an encounter with Bubbles and hitting her with a cane.<sup>23</sup>
- **June 23, 2025:** Antle is shown leading a direct contact encounter between members of the public and Bubbles,<sup>24</sup> leading an encounter with chimpanzees where he has chimpanzees hit beach balls into the audience,<sup>25</sup> and Antle and his son make a tiger climb a post for a performance.<sup>26</sup>
- **June 14, 2025:** Antle posing with an MBS guest during a direct contact encounter with Bubbles.<sup>27</sup>
- **June 12-16, 2025:** John Phillips, Esq., posted various photos to Instagram documenting the visit to MBS.<sup>28</sup> Phillips and his family are depicted holding and interacting with a chimpanzee, with Antle visible in the photos and even captured holding the rope to which the chimpanzee is tethered.<sup>29</sup> Phillips directly tags Doc Antle in one of the post's captions

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<sup>20</sup> Ex. 9.

<sup>21</sup> Video 1 (July 17, 2025), also available at <https://www.instagram.com/p/DMNTIS1AcEg/>

<sup>22</sup> Video 2 (June 29, 2025).

<sup>23</sup> Video 3 (June 29, 2025), also available at [https://www.instagram.com/p/DLhsOVIMDgI/?img\\_index=1](https://www.instagram.com/p/DLhsOVIMDgI/?img_index=1)

<sup>24</sup> Video 4 (June 23, 2025), also available at [https://www.instagram.com/p/DLQ\\_yxnuPG8/?img\\_index=12](https://www.instagram.com/p/DLQ_yxnuPG8/?img_index=12)

<sup>25</sup> Video 5 (June 23, 2025), also available at [https://www.instagram.com/p/DLRE5mcO38a/?img\\_index=9](https://www.instagram.com/p/DLRE5mcO38a/?img_index=9)

<sup>26</sup> Video 6 (June 23, 2025), also available at [https://www.instagram.com/p/DLRE5mcO38a/?img\\_index=18](https://www.instagram.com/p/DLRE5mcO38a/?img_index=18)

<sup>27</sup> Ex. 15, Photos of Elephant Encounter with Antle Posted by baadkash (June 14, 2025).

<sup>28</sup> See generally John M. Phillips, Esq. (@johnphillipsesq), [INSTAGRAM](https://www.instagram.com/johnphillipsesq/) (last visited June 26, 2025).

<sup>29</sup> Ex. 16, Photos of Chimpanzee Encounter Posted by John Phillips, Esq. (June 12, 2025); also available at [https://www.instagram.com/p/DK5Jy9kuIzi/?img\\_index=7](https://www.instagram.com/p/DK5Jy9kuIzi/?img_index=7)

and thanks him.<sup>30</sup> Phillips and his family are also seen riding and interacting with Bubbles the elephant.<sup>31</sup> While Antle is likely hidden behind Bubbles' frame in many of these images, one image reveals Antle standing in the water near Bubbles, while a child rides Bubbles' face and trunk.<sup>32</sup> Phillips again tags Antle in the post.<sup>33</sup>

- **May 24, 2025:** Antle can be heard in a video showing a chimpanzee sitting by an open flame pit with a stick of burning marshmallow in their hands.<sup>34</sup> Antle is apparently leading a presentation on founding MBS, discussing how he worked on films all over the world before building MBS.<sup>35</sup>
- **May 12, 2025:** Antle can be seen in the background of a video of a liger presentation.<sup>36</sup>
- **February 2025:** Antle can be heard in a video of a lion talking about how MBS operates.<sup>37</sup>

Additionally, Antle circumvented his license denial by exhibiting covered animals under the Sugriva license and making them available to the public by displaying them online through his, likely monetized, social media accounts. Antle affiliates not only himself but also the displays of the animals to MBS. On his personal Instagram, Antle lists himself as the "Founder" of MBS.<sup>38</sup> Antle's posts of covered animals, which he makes available to his over 616,200 followers, are all watermarked with the words "Myrtle Beach Safari."<sup>39</sup> After his license denial in January 2024, Antle has exhibited animals under the MBS license by sharing the following videos:

- **July 14, 2025:** Antle in swimming pool with two chimpanzees, Sugriva and Vali, on a pool float.<sup>40</sup>
- **April 12, 2025:** Antle in the pool holding Vali the chimpanzee.<sup>41</sup>
- **February 18, 2025:** Antle holding Angada and two cubs on his lap. Antle kisses and rests his head against Angada's.<sup>42</sup>
- **December 31, 2024:** Antle with a chimpanzee, saying "Happy New Year," and toasting with the chimpanzee.<sup>43</sup>
- **November 30, 2024:** Antle with two tigers.<sup>44</sup>
- **August 10, 2024:** Antle in the water, holding a white tiger.<sup>45</sup>

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<sup>30</sup> *Id.* ("Okay, waking up to chimp playtime is fun. Thanks @docantle. Being a small part of the Tiger King ecosystem was crazy but still has its moments. Haha.").

<sup>31</sup> Ex. 17, Photos of Elephant Encounter Posted by John Phillips, Esq. (June 16, 2025), *also available at* [https://www.instagram.com/p/DK8QesHuWkP/?img\\_index=12](https://www.instagram.com/p/DK8QesHuWkP/?img_index=12)

<sup>32</sup> *Id.*

<sup>33</sup> *Id.*

<sup>34</sup> *Video 7* (May 24, 2025), *also available at* <https://www.instagram.com/p/DKClyLwtOtV/>

<sup>35</sup> *Id.*

<sup>36</sup> *Video 8* (May 12, 2025).

<sup>37</sup> *Video 9* (Feb. 2025).

<sup>38</sup> Dr. Bhagavan Antle (@docantle), [INSTAGRAM](#) (last checked June 26, 2025).

<sup>39</sup> *Id.*

<sup>40</sup> *Video 10* (July 14, 2025), *also available at* <https://www.instagram.com/p/DMGZtZTyTC4/>. Note that this video was posted following Antle's sentencing hearing.

<sup>41</sup> *Video 11* (April 12, 2025), *also available at* <https://www.instagram.com/p/DIWMpZzODsd/>

<sup>42</sup> *Video 12* (Feb. 18, 2025).

<sup>43</sup> *Video 13* (Dec. 31, 2024), *also available at* <https://www.instagram.com/docantle/reel/DEQ7xGKurgk/>

<sup>44</sup> *Video 14* (Nov. 30, 2024), *also available at* <https://www.instagram.com/docantle/reel/DDAsN-HSCYJ/>

<sup>45</sup> *Video 15* (Aug. 10, 2024), *also available at* <https://www.instagram.com/theroyalwhitetiger/reel/C-f0i9txIn6/>

- **July 27, 2024:** Antle in the water with Vali the chimpanzee. Vali is squatting on a ledge in the water, with one arm wrapped around Antle's neck. Antle has her share a drink from a pineapple with him.<sup>46</sup>
- **May 18, 2024:** Antle in the water with Bubbles and a dog. The dog is balanced on Bubbles' head, and Antle throws a tennis ball for the dog. The dog launches off Bubbles' head to retrieve the ball.<sup>47</sup>
- **May 13, 2024:** Antle in the water, with two chimpanzees, Angada and Tara. The chimpanzees are balancing on a wooden plank and eating watermelon. Antle kisses one of the chimpanzees.<sup>48</sup>
- **February 24, 2024:** Antle closely holding and touching faces with Vali the chimpanzee.<sup>49</sup>
- **February 23, 2024:** Antle holding a capuchin monkey named Socsay while the capuchin plays with his necklace.<sup>50</sup>
- **January 31, 2024:** Antle petting and kissing Tara the chimpanzee while she climbs a tree.<sup>51</sup>
- **January 27, 2024:** Antle holding a jaguar cub.<sup>52</sup>

With each of these posts, Antle exhibited AWA-covered animals at MBS to members of the public, showing that Sugriva's license allows Antle to flagrantly circumvent his disqualification from holding an AWA license. The USDA must terminate Sugriva's license for apparent circumvention of Antle's license denial and deny future applications for AWA licenses from Antle, York, or similarly affiliated persons at MBS, as any such license will serve as a means for Antle's continued circumvention.

### III. Sugriva has Violated the AWA and Its Regulations by Allowing Antle to Exhibit Bubbles the Elephant and Tara the Chimpanzee to the Public and Failing to Follow AWA Handling and Public Exhibition Requirements.

The AWA requires, during public exhibition, that animals "be handled so there is minimal risk of harm to the animal and to the public, with sufficient distance and/or barriers between the animal and the general viewing public so as to assure the safety of animals and the public." 9 C.F.R. § 2.131(c)(1). Animals can only be exhibited "under conditions consistent with their good health and well-being." *Id.* § 2.131(d)(1). During public exhibition, a "responsible, knowledgeable, and readily identifiable employee or attendant must be present at all times during periods of public contact." *Id.* § 2.131(d)(2). Dangerous animals "such as . . . elephants must be under the direct control and supervision of a knowledgeable and experienced animal handler." *Id.* § 2.131(d)(3).

#### a. Elephant Handling

Elephants pose a significant danger to humans. Elephant expert Dr. Chris Draper, who has over 25 years of experience in animal welfare science, stated that:

<sup>46</sup> Video 16 (July 27, 2024), also available at <https://www.instagram.com/docantle/reel/C98Hp2ySNs8/>

<sup>47</sup> Video 17 (May 18, 2024), also available at <https://www.instagram.com/docantle/reel/C7HKwmPOdDQ/>

<sup>48</sup> Video 18 (May 13, 2024), also available at <https://www.instagram.com/docantle/reel/C66AOhBO8nA/>

<sup>49</sup> Video 19 (Feb. 24, 2024), also available at <https://www.instagram.com/docantle/reel/C3wMn8yuCF9/>

<sup>50</sup> Video 20 (Feb. 23, 2024), also available at <https://www.instagram.com/docantle/reel/C3s9LMKOtdf/>

<sup>51</sup> Video 21 (Jan. 31, 2024), also available at [https://www.instagram.com/docantle/reel/C2xFGDXu\\_fz/](https://www.instagram.com/docantle/reel/C2xFGDXu_fz/)

<sup>52</sup> Video 22 (Jan. 27, 2024), also available at <https://www.instagram.com/docantle/reel/C2nw1SFuQXR/>



[E]lephants are extremely dangerous wild animals. They are very large (10-20,000lbs) with enormous physical strength. Their intelligence, coupled with their often traumatic experiences in captivity, can make them unpredictable and highly motivated to test their handlers and unfamiliar individuals. Not only can they hit and grab with a 300lb, highly muscular and hydrostatic trunk, but they can kick, crush with legs and head, pierce with tusks (if present), crush between body and hard objects, and bite. Even the tail represents a formidable weapon. ... No elephant can be trusted implicitly, nor can any elephant ever be considered entirely under the safe control of a human handler, especially if the animal is scared or angered. In my view, perceptions of elephants as being docile and tractable are dangerously misinformed, based perhaps on media representations of elephants that have little basis in fact.

Dr. Draper's expert credentials and comments are provided in full in Exhibit 18.<sup>53</sup>

[Dangerous interactions](#) with captive elephants have resulted in dozens of human deaths and catastrophic injuries in the United States. Captive animal care professional Margaret Whittaker, who has nearly 40 years of experience working with and developing husbandry protocols for elephants, stated that:

There is a significant risk to human safety during these encounters. Elephants kill dozens (and some years 100s) of people annually during festivals, encounters, and other tourism activities. There are numerous examples of so-called cooperative and 'sweet' elephants that suddenly attack and injure or kill people. Once the elephant's behavior escalates, even a trainer with stringent control cannot redirect the elephant to protect other people in the vicinity. Elephants who are unable to engage in species-appropriate behaviors such as socialization, foraging and feeding, and normal activity patterns may feel extreme frustration and when that frustration becomes intolerable, they lash out at humans.

Whittaker's expert credentials and comments are provided in full in Exhibit 19.<sup>54</sup>

Even the USDA warns its own inspectors that "you are putting yourself at risk when you go near an elephant," and requires them to remain at least eight feet away from an elephant's trunk at all times and to "always have an escape route planned."<sup>55</sup> The USDA has cited other facilities for dangerous encounters involving other smaller, unrestrained animals.<sup>56</sup> If the USDA finds that these encounters endanger the public, then it logically follows that the USDA would agree that direct contact encounters with an unrestrained elephant, who is being handled by a lackadaisical, 65-year-old man, are also dangerous encounters that do not comply with AWA handling restrictions.

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<sup>53</sup> Ex. 18, Dr. Chris Draper, Expert Opinion (June 26, 2025).

<sup>54</sup> Ex. 19, Margaret Whittaker, Executive Director, Wild Welfare US, Expert Opinion (June 24, 2025).

<sup>55</sup> See USDA [Animal Welfare Inspection Guide](#) 3-12, 3-11 (Mar. 2024).

<sup>56</sup> Ex. 20, USDA Inspection Report, Single Vision Inc. (license no. 58-C-1117) (Sept. 5, 2023) (citing in part for repeat violation of § 2.131(c)(1) by exhibiting a juvenile silver fox, an adult serval, a ring-tailed lemur, and a kinkajou on numerous occasions without an identifiable method of effective restraint or established barrier).



Despite the inherent risks in exhibiting captive elephants, Antle led guests through direct contact encounters with Bubbles in June 2025.<sup>57</sup> During an encounter with Bubbles in a river, John Phillips and three children rode Bubbles' back together while she was submerged in water.<sup>58</sup> The children are shown standing on and jumping from Bubbles' back, and balancing on her face and trunk.<sup>59</sup>

There was no "responsible, knowledgeable, and readily identifiable employee" present during the exhibition. Antle—a man who has pleaded guilty to crimes involving animals and repeatedly and continually violates the AWA—has shown the USDA time and time again that he is irresponsible, so much so that he is ineligible to hold an AWA license. Antle alone was present, but he does not and cannot satisfy the § 2.131(d)(2) requirement for Sugriva.

Bubbles was also not under direct control during this exhibition, as required by the AWA for "dangerous animals." *Id.* § 2.131(d)(3). Antle is submerged up to his neck in water. While Antle would almost certainly be unable to stop Bubbles from attacking or behaving aggressively, if she chose to, on land, there is even less of a chance that Antle could control Bubbles while nearly completely submerged underwater if she were to suddenly respond to a stressor, like a child swinging from her face or wrestling with her trunk, with aggression.

Captive wildlife experts universally agree that these encounters are exceptionally dangerous for both Bubbles and the visitors who are allowed to interact with her. The Oakland Zoo's Vice President of Animal Care, Conservation and Research Colleen Kinzley reviewed videos and images of these encounters and opined that:

It is likely that the people climbing on the elephant have no idea how much danger they could be in. There are many examples of very well-trained wild animals, including elephants that have performed for years and then supposedly "out of the blue" attacked and either seriously injured or killed a person. ... There is nothing in an elephant's natural social behavior that would make you expect that they would be comfortable with humans climbing around on their head or hanging on their trunk. I am concerned that ... something unexpected or Bubbles just choosing not to tolerate this treatment anymore could result in serious human injury or death.

Kinzley oversaw the Oakland Zoo's elephant program from 1990 until the exhibit closed last year. Under her guidance, the zoo has become known for its spacious habitats and behavior management programs, which provide animals with freedom of choice and control over their environment. Her expert comments are provided in full in Exhibit 21.<sup>60</sup>

Dr. Draper reviewed the numerous videos and photographs of Bubbles interacting with visitors and opined that:

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<sup>57</sup> Ex. 15, also available at [https://www.instagram.com/p/DK8QesHuWkP/?img\\_index=12](https://www.instagram.com/p/DK8QesHuWkP/?img_index=12)

<sup>58</sup> *Id.*

<sup>59</sup> *Id.*

<sup>60</sup> Ex. 21, Colleen Kinzley, Vice President of Animal Care, Conservation and Research, Oakland Zoo, Expert Opinion (June 24, 2025).

[G]roups of adults, children, and even infants are touching, stroking, and holding the elephant. It would seem that nothing is off limits, as other videos show people riding her in a lake or river. In some instances, visitors climb on and off her head and back in the water, or are lifted by her trunk.

In my opinion, it is only a matter of time before someone is killed or seriously injured as a result of similar close physical contact with Bubbles. ... There is an inherent and currently underestimated risk inherent in any close-contact situation between humans and elephants.

Whittaker also reviewed dozens of videos and images of public encounters with Bubbles and opined that:

In multiple videos, it can be seen that when people are lifted and sliding down her trunk towards her head, they grasp her face and trying not to fall and end up grabbing at her eyes. The potential for eye damage is significant. Additionally, people launch themselves off her back as if she's a diving board causing pressure to a part of her body not designed for this. In addition to the risks to her physical well-being, if she does get grabbed in a painful way (e.g. eyes poked by fingers and/or fingernails) or experiences pain when people jump off of her, her reaction to this discomfort poses considerable danger to the humans in her vicinity.

Myrtle Beach Safari's standard practice during encounters with Bubbles continues to be that guests stand next to and often touch Bubbles' trunk. PETA previously reported these dangerous direct contact encounters.<sup>61</sup> Additional videos posted on Instagram since then continue to show the ongoing dangerous conduct:

- **July 17, 2025:** Children and Rio, MBS caretaker and trainer, sitting on Bubbles during a direct encounter in the river, with one of the children touching Bubbles' trunk and jumping off of Bubbles.<sup>62</sup>
- **June 24, 2025:** Two women standing in front of Bubbles during a river encounter and Bubbles' trunk reaches towards one of the women.<sup>63</sup>
- **June 12, 2025:** A woman and a baby hold onto and pet Bubbles' trunk.<sup>64</sup>
- **May 8, 2025:** A group of two adults and four children are shown in front of Bubbles and petting her trunk.<sup>65</sup>
- **April 15, 2025:** Two women during a river encounter with Bubbles are shown to be riding and posing for photos with her. One of the women is laying on Bubbles' trunk and face, is hoisted up by Bubbles' trunk, and the woman scales Bubbles' head to climb onto Bubbles' back.<sup>66</sup>

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<sup>61</sup> See Complaint INQ-29349 sent on August 26, 2024.

<sup>62</sup> Video 23 (July 17, 2025), also available at <https://www.instagram.com/p/DMOGbMyxGL3/>

<sup>63</sup> Video 24 (June 24, 2025), also available at <https://www.instagram.com/p/DLTIfmfgh1z/>

<sup>64</sup> Video 25 (June 12, 2025), also available at <https://www.instagram.com/p/DK0ez9LgUw3/>

<sup>65</sup> Video 26 (May 8, 2025), also available at <https://www.instagram.com/p/DJZufB0gXhW/>

<sup>66</sup> Video 27 (April 15, 2025), also available at <https://www.instagram.com/p/DId9KnAAAt9Y/>

- **March 3, 2025:** Jaden Hicks is shown having direct encounters with numerous animals, including Bubbles. During the encounter with Bubbles, Hicks is shown petting and holding onto Bubbles' trunk, feeding Bubbles, and tossing food into Bubbles' mouth.<sup>67</sup>
- **October 6, 2024:** A young girl is dancing in front of Bubbles while Bubbles' trunk reaches over and around the girl.<sup>68</sup>
- **September 9, 2024:** Two people are petting and holding onto Bubbles' trunk.<sup>69</sup>

While it is likely Antle is just out of the frame in these images, or may be the person taking the video clips, the fact that neither he nor any other handler is standing between Bubbles' powerful trunk and the guests puts them in grave danger, should Bubbles suddenly respond to a stressor with aggression—which would be a completely natural and expected behavior from a wild animal. The USDA previously cited Carson and Barnes Circus for a similar violation, stating, “the facility must take steps to ensure the safety of all members of the public. Trained handlers must be present *at or near the head* of each elephant in any type of public contact. This includes feeding, grooming, and photo opportunities.”<sup>70</sup> Despite its inconsistent enforcement and apparently preferential treatment of Antle over this issue, the USDA has previously stated regarding encounters with Bubbles that even if a handler is just outside the image frame, “we would expect a handler to have more control over the elephant were [she] to interact with the public with [her] trunk.”<sup>71</sup> It appears that Antle—who should not be exhibiting under Sugriva's license to begin with—and Sugriva have flagrantly and consistently allowed guests to have direct contact with Bubbles in manners that place the guests in serious danger.

The USDA must hold Sugriva accountable by terminating its license for exhibiting Bubbles in a manner that grossly violates the AWA and deny future applications for AWA licenses from Antle, York, or similarly affiliated persons at MBS, as any such license will enable Antle to circumvent his license denial and dangerously exhibit Bubbles at MBS. 9 C.F.R. §§ 2.11(a)(2),(6); 2.11(d); 2.12; 2.131(c)(1); 2.131(d)(1),(2),(3).

#### b. Chimpanzee Handling

During John Phillip's visit to MBS, Antle also brought a chimpanzee, Tara, to the guests' accommodations for direct contact.<sup>72</sup> Again, Antle is the one leading the encounter, and there is no MBS employee in sight.<sup>73</sup> Tara is on a waist leash, and Antle is seen holding the other end of the leash.<sup>74</sup> Phillips and the children are shown holding onto Tara, and in many of these interactions, Tara has her hands around the children's shoulders or the back of their heads.<sup>75</sup>

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<sup>67</sup> Video 28 (Mar. 3, 2025).

<sup>68</sup> Video 29 (Oct. 6, 2024), also available at <https://www.instagram.com/p/DAYkCXFxmT/>

<sup>69</sup> Video 30 (Sept. 9, 2024), also available at [https://www.instagram.com/p/C\\_s2ydLA9ru/](https://www.instagram.com/p/C_s2ydLA9ru/)

<sup>70</sup> Ex. 22, USDA Inspection Report, Carson & Barnes Circus (license no. 73-C-0001) (Mar. 22, 2022) (emphasis added).

<sup>71</sup> See Ex. 23, email correspondence dated Nov. 18, 2021, between Dr. Jeffrey Shepherd, Supervisory Animal Care Specialist, and Jeremy Steele, Compliance and Enforcement Specialist.

<sup>72</sup> Ex. 16.

<sup>73</sup> *Id.*

<sup>74</sup> *Id.*

<sup>75</sup> *Id.*

Again, Antle is not permitted to exhibit animals without a license. *Id.* § 2.1(a)(1). Antle also cannot use the MBS license to circumvent his lack of a license. For the above-stated reasons, Antle cannot satisfy the § 2.131(d)(2) requirement. Additionally, this exhibition did not ensure that Tara was handled in a manner that minimized the risk of harm to her or the MBS guests, as required by § 2.131(c)(1). MBS was recently cited during a focused inspection for violating handling regulations by similarly allowing a lemur to sit on the heads of two members of the public. The inspector stated that “[a]llowing non-human primates to sit on the heads or shoulders of guests heightens the risks of injury to both the animals and the public, and can contribute to greater exposure of zoonotic disease between non-human primates and humans.”<sup>76</sup> Similarly here, Tara is holding onto the necks and shoulders of children, and Tara is seen with her face in close proximity to the children’s faces. There is a great risk of injury to both Tara and the children, as well as a heightened risk of zoonotic disease exposure. It follows that Tara was also not exhibited under conditions consistent with her good health and well-being if the guests were permitted to have free contact with her, leaving her exposed to injury and illness. *Id.* § 2.131(d)(1). Chimpanzees are uniquely susceptible to human illnesses, which can become more serious for chimpanzees.<sup>77</sup>

Unprotected direct contact with chimpanzees is an inherently dangerous activity that presents a high risk of serious injury or death. Chimpanzees are highly intelligent animals, who are extremely agile and “easily several times stronger than a human.”<sup>78</sup> They can react unpredictably with little or no warning and are always capable of inflicting serious and lethal injuries. Since 1990, there have been at least forty-four incidents involving chimpanzees that have resulted in death or serious injuries, such as deep lacerations, bite wounds, amputations, facial scarring, and deformities, in the United States alone.<sup>79</sup> This includes the following instances, which were similar to the unprotected contact between Tara and members of the public.

| Date                     | Location       | Facility                       | Description  |
|--------------------------|----------------|--------------------------------|--|
| 10/31/2020 <sup>80</sup> | Miami, Florida | Zoological Wildlife Foundation | A young chimpanzee was seated next to a child for a photo op when the chimpanzee suddenly grabbed and bit the child’s arm, causing a deep laceration that required stitches. |

<sup>76</sup> Ex. 24, USDA Inspection Report, Sugriva Co. LLC (license no. 56-C-0280) (July 16, 2024).

<sup>77</sup> See, e.g., Julia Musto, *Researchers worry chimpanzee-killing bacterium could jump to humans next*, FOX NEWS (Feb. 4, 2021) (“There are very few pathogens that infect chimpanzees without infecting humans and very few pathogens that infect humans without infecting chimpanzees”), <https://www.foxnews.com/science/researchers-worry-chimpanzee-killing-bacterium-jump-humans>; see also, Rachel Nuwer, *Chimps are dying of the common cold. Is great ape tourism to blame?* The Guardian (May 2, 2024), <https://www.theguardian.com/environment/2024/may/02/great-ape-tourism-chimpanzee-common-cold-reverse-zoonoses-uganda-aoc>.

<sup>78</sup> AZA Chimpanzee Species Survival Plan, *Chimpanzee Care Manual*, ASSOC. OF ZOOS AND AQUARIUMS 19 (2010), <https://assets.speakcdn.com/assets/2332/chimpanzee-care-manual-2010r.pdf>

<sup>79</sup> *Primate Incidents in the United States*, PETA, <https://www.peta.org/wp-content/uploads/2021/06/Primate-Incident-List-US-only.pdf>.

<sup>80</sup> Ex. 25, Fla. Fish & Wildlife Conservation Comm’n, *Captive Wildlife Rep.* Zoological Wildlife Foundation (Nov. 2, 2022).

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|--------------------------|------------------------|--|--|
| 10/23/2007 <sup>81</sup> | Elkton,<br>Maryland    | Party Safari Zoo                                       | A chimpanzee bit a woman's arm while posing for photographs that would appear in a commercial.   |
| 11/26/2004 <sup>82</sup> | Evansville,<br>Indiana | Hadi Shrine<br>Circus/Zoppe-<br>Rosaire<br>Chimpanzees | A chimpanzee bit a patron on the cheek while posing for photographs, requiring the patron to be treated at the hospital for puncture wounds. |
| 04/09/2000 <sup>83</sup> | Franklin,<br>Tennessee | Sid Yost/Ranger<br>Rick Kelly                          | A chimpanzee bit a child's hand while posing for photographs, requiring stitches.  |
| 07/07/1990 <sup>84</sup> | Portland,<br>Oregon    | Circus Gatti   | Two leashed and collared chimpanzees pulled a child from their seat and mauled her.  |

Accordingly, PETA requests that the USDA terminate Sugriva's license for exhibiting chimpanzees in violation of the AWA and deny future applications for AWA licenses from Antle, York, or similarly affiliated persons at MBS, as any such license allows Antle to circumvent his license denial and dangerously exhibit chimpanzees at MBS. 9 C.F.R. §§ 2.11(a)(2),(6); 2.11(d); 2.12; 2.131(c)(1); 2.131(d)(1),(2).

c. Antle and Sugriva Placed the Health of Bubbles and Tara in Serious Danger

When an exhibitor "is placing the health of any animal in serious danger in violation of" the AWA and its regulations or standards "the Secretary *shall* notify the Attorney General, who may apply to the United States district court in which such . . . exhibitor . . . resides or conducts business for a temporary restraining order or injunction. . . ." *Id.* § 2159(A) (emphasis added). Antle and MBS's failure to exhibit and handle animals in accordance with the AWA and its regulations places the health of said animals in serious danger.

As discussed above, Antle led a direct contact encounter involving Bubbles, one adult, and three children in a river, in violation of the AWA and its regulations. *See supra a*; 9 C.F.R. § 2.131(c)(1), (d)(1),(2),(3). During this encounter, Antle allowed the family to ride on Bubbles' back, and the children to freely climb on and jump from Bubbles, and hang on Bubbles' trunk, placing Bubbles' health in serious danger. An elephant is not to be freely used as a jungle gym. Being ridden by four people simultaneously, stood on, and grabbed onto, does not equate to exhibiting an elephant under conditions consistent with their good health and well-being. Additionally, in the foreseeable event that Bubbles were to respond to a stressor with aggression (per the expert statements above), Bubbles would likely be shot and killed to protect members of the public, placing Bubbles' health in serious danger. Free contact interactions with Bubbles, such as the interactions discussed above, often occur at MBS and can cause significant harm to Bubbles, placing her health in serious danger.

<sup>81</sup> Ex. 26, USDA Inspection Report, Judie Harrison (d.b.a. Party Safari Zoo) (license no. 51-C-0054) (Apr. 8, 2008).

<sup>82</sup> Ex. 27, USDA Inspection Report (Dec. 7, 2004); Ex. 28, Amber Griswold, WFIE Daily, *Guest Bitten by Animal at Hadi Shrine Circus Evansville, Indiana* (Nov. 29, 2004).

<sup>83</sup> Ex. 29, Janet Lethgo, THE TENNESSEAN, *Parents due after girl bitten by chimp* (May 31, 2001).

<sup>84</sup> Ex. 30, Letter to the Editor, *Drop wild animal act* (July 19, 1990).

Likewise, Antle's aforementioned direct encounter involving Tara and the Phillips party violated the AWA and its regulations. Antle permitted the guests to have free contact with Tara. They are seen holding Tara up off the ground or sitting with her on a couch, with their faces near Tara's. This encounter placed Tara's health in serious danger. Like Bubbles, Tara is not an inanimate doll or plaything to be passed between humans, who have no professional animal handling experience, for photo opportunities. The USDA has historically noted when issuing citations for primate handling conducted in violation of the AWA and its regulations that "[t]he animals may contract diseases from members of the public, or animals may be injured when roughly handled or dropped by members of the public."<sup>85</sup> The manner in which Antle exhibited Tara during this direct encounter is no different. With no barrier or meaningful distance between Tara and the guests, she is rendered vulnerable to injury and disease during such public encounters. In the foreseeable event that Tara behaved aggressively, as is in her nature as a chimpanzee, during a direct encounter, there could be fatal consequences for Tara. Barriers and meaningful distance are instrumental in protecting both the public and Tara from injury or worse. Free contact interactions, such as the interaction that occurred with the Phillips party, place Tara's health in serious danger.

The AWA prescribes exhibition and handling requirements that must be followed to protect the animals involved. Antle and MBS exhibited Bubbles and Tara with blatant disregard for these requirements and placed their health and safety in serious danger. Thus, PETA respectfully requests that the USDA refer this case to the Department of Justice, as required by 9 C.F.R. § 2159(A).

#### IV. Animal Care Displayed Apparent Bias Towards Antle and Now Sugriva When It Comes to AWA Enforcement.

PETA has repeatedly reported AWA violations by Antle and MBS to the USDA, even before Antle was disqualified from licensure. However, Animal Care has consistently found ways to avoid enforcing the AWA, seemingly giving Antle and MBS preferential treatment that they take full advantage of.

Seven days after Antle was arrested for then alleged violations of federal law, York formed Sugriva.<sup>86</sup> The following day, York informed the USDA that she would be taking over operations of MBS.<sup>87</sup> During Sugriva's pre-license inspections, Antle "interrupted on several occurrences. Despite [] many requests and attempts to redirect all questions and responses to China, Antle's interference was ongoing . . . his interjections were interfering/distracting during the entire inspection process."<sup>88</sup> Despite York reportedly being the "sole owner of the LLC and [that] she will lead the company,"<sup>89</sup> York deferred to Antle on questions regarding animal care. Antle even told the inspector that York cannot be expected "to know all the answers to these questions since

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<sup>85</sup> Ex. 31, USDA Inspection Report, Tami Holliman (license no. 65-C-0572) (Nov. 18, 2022).

<sup>86</sup> Ex. 32, Sugriva Co LLC, Articles of Organization (June 10, 2022); Ex. 2.

<sup>87</sup> Ex. 11, at p. 36-37 (Email from China York to APHIS Animal Care (June 11, 2022)); *Id.* at p. 35 (Email from China York to Carla R. Thomas, APHIS (June 17, 2022)). York initially claimed she would be licensed under Vali Co LLC, of which Antle's son—Kody Antle—is the only other managing member. However, York ultimately used Sugriva Co LLC for licensure.

<sup>88</sup> *Id.* at p. 27 (Email from Carla R. Thomas, APHIS, to Jeffery A. Shepherd, APHIS (Oct. 4, 2022)).

<sup>89</sup> Ex. 9; Ex. 11 at p. 27 (Email from Carla R. Thomas, APHIS, to Jeffery A. Shepherd, APHIS (Oct. 4, 2022)).

he still owns the animals/operation.”<sup>90</sup> The inspector noted that “[t]his was confusing, since China is supposed to be the applicant.”<sup>91</sup> Nevertheless, Sugriva passed the inspection and was issued an AWA license.

After issuing Sugriva’s license, then Director of Animal Care, Dr. Robert Gibbens, informed Antle’s agent that “Antle will have 30 days to complete the transfer of his business to Sugriva.”<sup>92</sup> It has been nearly three years since that correspondence and there is no evidence that any transfer of ownership occurred.<sup>93</sup> Gibbens additionally stated that “[u]nless something has changed, we don’t have a case for circumvention since Antle hasn’t been convicted or pleaded guilty to anything.”<sup>94</sup> The USDA seemingly recognized that something had, in fact, changed when it denied Antle’s license application for pleading guilty to Lacey Act violations.<sup>95</sup> However, the USDA ostensibly did not readdress whether it had a case for circumvention with Sugriva’s license, despite the fact that the AWA’s regulations plainly forbid the agency from issuing licenses when the licenses would circumvent an order denying a license and authorize the USDA to terminate licenses for operating in circumvention of the AWA. 9 C.F.R. §§ 2.11(a)(2),(6); 2.11(d).

Now, the case for circumvention persists. The aforementioned evidence suggests that Antle has retained a prominent role at MBS and is circumventing the AWA and its regulations by exhibiting under the Sugriva license, which should not have been issued in the first place, as it was a clear ploy to circumvent Antle’s anticipated license denial. As discussed above, Antle, through counsel, even represented to the federal court in his criminal case that he has been treating Sugriva’s license as if it were his own. Such an admission suggests that Antle does not fear any repercussions from the USDA for flagrantly flouting license circumvention as a bid to garner a lesser sentence. The USDA must finally hold Antle and his associates accountable and terminate Sugriva’s license for circumventing USDA regulations and deny future applications for AWA licenses from Antle, York, or similarly affiliated persons at MBS, because any such license will allow Antle to circumvent his own license denial.

## V. Conclusion

Antle’s actions show a deliberate disregard for the AWA and should send the USDA a message that he and his associates believe they can freely violate the law without consequence. Sugriva’s license is unequivocally being used to circumvent Antle’s own license denial. Accordingly, PETA respectfully requests that the USDA (1) terminate Sugriva’s license for apparent circumvention of USDA regulations and apparent handling violations, (2) deny future applications for AWA licenses from Antle, York, or similarly affiliated persons at MBS, (3) refer this case to the DOJ for apparent serious danger violations, as required by § 2159(A).

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<sup>90</sup> Ex. 11, at p. 23 (Email from Carla R. Thomas, APHIS, to Jeffery A. Shepherd, APHIS (Oct. 4, 2022)).

<sup>91</sup> *Id.*

<sup>92</sup> Ex. 33, USDA Complaint Response re: Bhagavan Antle at p. 3 (Email from Robert Gibbens, APHIS, to Roxanne C. Mullaney, et. al., APHIS, (Oct. 14, 2022)).

<sup>93</sup> *Id.* at p. 2 (Email from Carla Thomas, APHIS, to Andrew Jones and Tanesha Wilkens, APHIS, Sugriva and TIGERS inspection (Feb. 8, 2023) (As of January 27, 2023, “there have been no updates regarding transfer of ownership.”)).

<sup>94</sup> Ex. 11, at p. 6 (Email from Robert Gibbens, APHIS, to Jeffery A. Shepherd et. al., APHIS (Oct. 13, 2022)).

<sup>95</sup> Ex. 7.