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**From:** Debbie Metzler  
**Sent:** Thursday, March 18, 2021 1:27 PM  
**To:** [REDACTED]@usda.gov  
**Cc:** animalcare@usda.gov; [REDACTED]@ogc.usda.gov  
**Subject:** Marcus Cook apparently exhibiting this weekend in Liberty TX RE: Request to investigate All Things Wild  
**Attachments:** Faux Real Trade Days Event With Tigers, Liberty TX.pdf  
**Importance:** High

Dear Dr. Gibbens,

I'm writing to follow-up on my correspondence from earlier this week regarding apparent illegal exhibition by All Things Wild. PETA received a report that Marcus Cook (with whom licensee Michael Todd was previously colluding to circumvent Cook's license revocation) will be exhibiting the tigers at an event in Liberty, Texas, starting **tomorrow, March 19**, and running through the weekend. Information on the "Faux Real Trade Days" event at the **Trinity Valley Exposition Fairgrounds, 321 FM563, Liberty, TX, 77575** is available [here](#), and attached.

Though the exhibitor is not named, the advertisement includes pictures that All Things Wild (dba "White Tiger Discovery") has used in [past promotional materials](#), including for this same event in 2019 where [they were promoted by name](#) (see p. 6-7 of attached). Given the egregious nature of Cook's continued flagrant disregard of the AWA, and the high likelihood that this is his exhibit, PETA requests that the USDA urgently investigate this event to confirm whether Cook is illegally exhibiting these animals in violation of the AWA.

Thank you for your immediate attention to this matter. Please inform me of the complaint number your agency assigns to this and my March 16 correspondence.

Regards,  
Debbie

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**From:** Debbie Metzler  
**Sent:** Tuesday, March 16, 2021 9:05 AM  
**To:** [REDACTED]@usda.gov  
**Cc:** animalcare@usda.gov; [REDACTED]@ogc.usda.gov  
**Subject:** Request for investigation of continued apparent illegal exhibition by Michael Todd dba All Things Wild

Dear Dr. Gibbens,

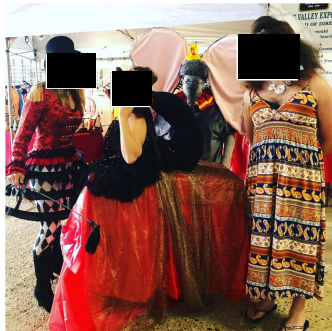
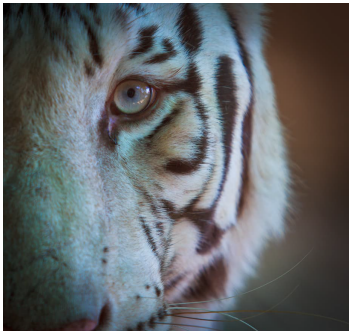
Please see the attached request for investigation and enclosures sent on behalf of PETA. Michael Todd, whose license was terminated on September 18, 2020, continued to exhibit animals apparently without a valid license, even following PETA's correspondence from October 2 and October 5, 2020 reporting ongoing apparent illegal exhibition. PETA requests for reasons outlined in the attached that the USDA pursue criminal prosecution of the responsible parties or refer these apparent violations to the U.S. Department of Justice for further proceedings.

Thank you for your timely attention to this matter. Please inform me of the complaint number your agency assigns to this correspondence.

### Faux Real Trade Days Liberty

February 27 at 3:13 AM

Get ready for "Under The Big Top" March 19-21 at FRTD in Liberty, TX! Come see the white tigers in the Swine Barn! We also have a petting zoo, bouncy houses, slides, train rides, face painting, and so much more! Come shop with hundreds of covered vendors rain or shine! FREE parking & FREE admission!



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March 16, 2021

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

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

Re: Request for investigation of apparent illegal exhibition by Michael Todd

Dear Dr. Gibbens,

I am writing on behalf of PETA to request that the USDA investigate Michael Todd, dba “All Things Wild” for his continued apparent illegal exhibition of tigers in violation of the Animal Welfare Act (AWA).

PETA previously reported (*see* complaint no. AC21-024) that Todd was unlawfully exhibiting at fairs in Alabama and Georgia after his AWA license (33-C-0388) was terminated by consent decree on September 18, 2020, prohibiting him from exhibiting animals for six months. Additional documentation enclosed shows that Todd continued to exhibit tigers at another fair that ran from November 6–15 in Mississippi, apparently without a valid license in violation of 7 U.S.C. § 2134 and 9 C.F.R. § 2.1(a)(1). (*See* Exhibit 1, Certificate of Veterinary Inspection for All Things Wild tigers to be moved from Georgia to the Pine Belt Fair in Hattiesburg, Mississippi; *see also* Photos 1–4 showing the All Things Wild exhibit at the fair.)

The AWA requires the USDA to notify the Attorney General whenever it believes an exhibitor’s violation of the AWA or its regulations and standards is “placing the health of any animal in serious danger,”<sup>1</sup> so the Attorney General may seek a preliminary injunction or temporary restraining order to enjoin the AWA violations. Todd has continued to exhibit tigers without the requisite exhibitor’s license, which inherently places the tigers in serious danger as he is evading AWA regulations designed to ensure the humane care and treatment of animals.<sup>2</sup>

The AWA also permits the USDA to pursue criminal charges, with the consent of the U.S. Department of Justice (DOJ), against an exhibitor who knowingly violates the AWA.<sup>3</sup> Todd’s decision to exhibit tigers immediately after entering into the consent decree that terminated his USDA license, and for at least two months more in three different states, appears to constitute a knowing violation of the AWA. Termination of Todd’s license is clearly insufficient, and he any other responsible parties must be held accountable to the fullest extent of the law. Accordingly, PETA requests that the USDA pursue criminal prosecution of the responsible parties or refer these apparent violations to the DOJ for further proceedings.

<sup>1</sup> 7 U.S.C. § 2159(a).

<sup>2</sup> *Id.* § 2131(1).

<sup>3</sup> *Id.* § 2149(d).

PEOPLE FOR  
 THE ETHICAL  
 TREATMENT  
 OF ANIMALS  
 FOUNDATION

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 757-622-PETA

PETA FOUNDATION IS AN  
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 TO SUPPORT ANIMAL PROTECTION.

AFFILIATES:

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

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

Very truly yours,



Debbie Metzler, M.S.

Associate Director of Captive Animal Law Enforcement

cc: John V. Rodriguez, Attorney for USDA in AWA Docket Nos. 18-0067, 18-0068, 18-0069

( [REDACTED] )