

T.I.G.E.R.S. (Bhagavan Antle)

851 Folly Ranch Ln., Myrtle Beach, SC 29588

T.I.G.E.R.S. (The Institute of Greatly Endangered and Rare Species), aka “Myrtle Beach Safari,” operated by Bhagavan Antle (aka “Kevin Antle,” “Kevin Bhagavan,” “Mahamayavi Bhagavan Antle,” “Bhagavan Kevin Antle,” “Ghagavan Antle,” “Doc Antle,” and “Dr. Kevin Antle”), has failed to meet minimum standards for the care of animals used in exhibitions as established by the federal Animal Welfare Act (AWA). The U.S. Department of Agriculture (USDA) has cited Bhagavan Antle for failing to provide animals with adequate veterinary care, sufficient cage space, protection from the elements, and clean water and for failing to provide dogs with an exercise plan and primates with a program of environmental enrichment. In 1991, the USDA charged Antle with multiple and repeated violations of the AWA, for which he paid a \$3,500 fine. Also in 1991, a lion held by him attacked a model during a photo shoot in New Hampshire—the model sustained injuries requiring more than 50 stitches. Antle asserts that he is a field surgeon, claiming to have earned a doctor of natural sciences degree from the Chinese Science Federation and a degree from the British College of Natural Sciences in Poole, England. T.I.G.E.R.S. was previously located in Tennessee. Antle has also done business under the name Buckingham Zoological Park in Virginia.

September 10, 2018: The USDA cited Antle for failing to have a responsible adult available so that an inspection could be conducted.

January 11, 2018: The USDA cited Antle for failing to keep a primary enclosure holding two gibbons, Santoshi and Saiuka, in good repair. Areas of damaged and deteriorating tin and metal components exposed sharp ends within their reach, risking injury to them.

January 31, 2017: The USDA cited Antle for failing to keep a primary enclosure for the cougar in good repair. Three metal hose clamps were deteriorating and had sharp points and edges that could injure the animal.

March 24, 2016: The USDA cited Antle for failing to have a program of veterinary care that addressed a recurring problem at the facility—two white tiger cubs exhibited ringworm-like lesions. The agency noted the need to address public-safety issues, including when the animals can have public contact.

October 21, 2015: The USDA cited Antle for failing to have a responsible adult available so that an inspection could be conducted.

April 28, 2015: The USDA cited Antle for failing to keep the food-preparation area free of pests and possible contamination. Several spiders, spiderwebs, and a frog were touching recently washed food bowls, and rodent droppings were on the floor.

April 23, 2015: The USDA cited Antle for failing to have a responsible adult available so that an inspection could be conducted.

February 5, 2014: The USDA cited Antle for failing to provide a 10-month-old male tiger with a secure enclosure.

August 21, 2013: The USDA cited Antle for failing to maintain the food-storage areas. The shelves in the walk-in cooler were coated with a thick, unidentifiable white substance, and the floor had a “broken/missing tile.”

October 6, 2012: The USDA cited Antle for failing to handle an adult liger and tigers in a safe manner during public exhibition. The handler led the big cats onto the stage by a chain leash with only a 3- to 4-foot-tall wooden rail as a barrier between the animals and the audience.

November 16, 2010: The USDA cited Antle for failing to maintain structurally sound housing facilities that contain the animals. Although an adult tiger escaped from an uncovered outdoor primary enclosure (see August 28, 2010), 43 adult tigers, three ligers, and two lions were being housed on a rotating basis in similar uncovered enclosures, which had proved not to be able to contain all large cats adequately. Many of these enclosures also had a substantial amount of vines growing up the sides and accumulating at the top of the fences, which could aid in big-cat escapes.

September 1, 2010: The USDA cited Antle for failing to maintain structurally sound housing facilities that contain the animals. After an adult tiger escaped from an enclosure (see the August 28, 2010, entry), the tiger was moved to a similarly constructed enclosure even though another escape could result.

August 28, 2010: An adult tiger and a monkey both escaped from enclosures at Antle’s Miami exhibition location, the Jungle Island Zoo. A USDA inspector wrote, “The tiger was motivated to chase a nonhuman primate which had entered the enclosure through the uncovered top and was quickly trying to exit back out of the enclosure after encountering a tiger. The tiger was able to

scale a 12 foot tall corner, engage and damage the kick back and subsequently escape over the top of the enclosure. The tiger did not fall or jump cleanly upon exiting the enclosure and was stunned for a short time after hitting metal poles and parts of the barrier fence surrounding the outside of the enclosure.” According to *Time*, visitors had to scramble frantically to get away from the 700-pound tiger, and one woman claimed that the tiger got within 10 feet of her 2-year-old daughter.

June 8, 2010: The USDA cited Antle for failing to have a responsible adult available so that an inspection could be conducted.

April 22, 2008: The USDA cited Antle for failing to establish and maintain programs of adequate veterinary care. The most recent tuberculosis test results available for an elephant were from more than a year before even though this elephant had direct contact with the public and tuberculosis is a contagious disease affecting elephants, humans, and other animals. Professional guidelines indicated that tuberculosis testing needed to be conducted no less than annually.

December 13, 2007: The USDA cited Antle for failing to handle animals in a way that minimized risk of harm to the animals and the public. An 8-month-old tiger was exhibited to the public without sufficient distance or barriers present, the tiger was led down a walkway and passed closely by the public without sufficient security measures in place, and a cougar was exhibited without sufficient distance from the public.

June 13, 2007: The USDA cited Antle for failing to observe all animals on a daily basis to assess their health and well-being. A white tiger had a red, raised nodular mass on the inside of his left ear that Antle was unaware of. He was also cited for failing to

have adequate cleaning, sanitization, housekeeping, and pest control. The light fixture in the mandrill enclosure had hot wire surrounding it, this wire was covered with spider webs, and live spiders were observed in the area. The USDA also cited Antle for failing to maintain the structural integrity of his facility. A female tiger was housed in a chain-link enclosure in which the bottom edge of the chain link was not secured. There was potential for the tiger to dig and escape or for other animals to dig into the enclosure. Antle was also cited for failing to provide adequate lighting. Three stalls housing eight animals had no artificial light, which prevented proper inspection of the animals and the enclosures.

April 9, 2007: The USDA cited Antle for failing to maintain adequate veterinary care. The written program of veterinary care had not been formally reviewed by the attending veterinarian for 18 months, and a formal site visit by the attending veterinarian had not occurred for 18 months. The exhibitor was also cited for failing to provide special attention to a nonhuman primate regarding enhancing his environment because of signs of psychological stress. A mandrill had alopecia on all four of his limbs initiated and sustained by overgrooming. Antle verbally described special environmental enhancement that could be given to this mandrill, but these enhancements were neither evident nor documented in the primate enrichment plan.

March 3, 2006: The USDA cited Antle for failing to provide adequate lighting. A mandrill was intermittently housed in an enclosure that wasn't sufficiently illuminated and didn't permit adequate observation of the animal to maintain good housekeeping practices, adequate cleaning, and adequate inspection of the animal to ensure his well-being.

June 29, 2005: The USDA cited Antle for failing to document an appropriate plan for environment enhancement adequate to promote the psychological well-being of the nonhuman primates.

March 30, 2005: The USDA cited Antle for failing to keep his premises clean and in good repair. Potentially toxic chemicals, including paints and insecticides, were stored in open bins in the areas housing the binturongs and a skunk, and a gas-fueled motorcycle was stored in the area housing the porcupine and coatimundi.

October 21, 2003: The USDA cited Antle for failing to maintain up-to-date animal records.

August 4, 2003: The USDA cited Antle for failing to provide wholesome, palatable food of sufficient quality and nutrient value free from contamination. The exotic feline diet, as signed by the attending veterinarian, required a percentage of commercially prepared food. No commercially prepared diet could be identified on the premises. It was also noted by the USDA inspector that several species present were not listed on the program of veterinary care.

October 22, 2002: The USDA cited Antle for failing to maintain structurally sound primate housing facilities. An enclosure had a damaged light fixture hanging from the ceiling, which could injure the primate within. Antle was also cited for having several screws protruding from exhibit surfaces, which could injure the enclosed primate.

January 24, 2002: The USDA cited Antle for failing to maintain structurally sound animal housing facilities. Several door openings had been cut through concrete block walls, resulting in rough surfaces that couldn't be easily cleaned and could injure the animals.

October 9, 2001: Two of Antle's tigers were being exhibited by Alligator Adventure when Alligator Adventure was cited by the USDA for failing to store food properly. The walk-in freezer was being used to store food for the felines as well as storing dead animals who were not in airtight bags and could have been sources of infectious organisms. The USDA also cited Alligator Adventure for failing to protect food from contamination. Animals' food was being thawed outdoors in an uncovered cardboard box with flies present on and around the food. Alligator Adventure was also cited for failing to have a clean freezer. The walk-in freezer had debris and animal carcasses on the floor and on top of wooden pallets.

September 9, 1999: The USDA cited Antle for failing to maintain accurate records on animals.

April 13, 1999: The USDA cited Antle for failing to prepare and implement a written feeding plan for the large felines at his facility.

October 7, 1998: The USDA cited Antle for failing to maintain accurate records on animals.

December 18, 1997: The USDA cited Antle for failing to review and update his primate environmental program, keep the premises free of trash and debris, repair the lion and squirrel cages, and keep food free from possible contamination.

April 25, 1994: The USDA cited Antle for failing to provide a copy of his travel itinerary. He was also cited for not providing three macaques and a baboon with sufficient space.

January 26, 1994: The USDA cited Antle for failing to provide a copy of his travel itinerary.

December 13-14, 1993: The USDA cited Antle for multiple violations, including failing to keep animal enclosures clean, storing the hay for the elephant on the ground where it was exposed to the elements, failing to have enough space to allow the wolf-hybrids and the tigers to make normal adjustments, failing to provide the tiger or leopard with protection from the elements, failing to provide adequate drainage, failing to keep food and water receptacles clean, failing to provide the hoofstock with a water source other than a pond, failing to maintain fences properly, and failing to keep the premises clean and in good repair.

November 12, 1993: Antle was assessed a \$1,000 civil penalty for failing to conduct a required official brucellosis test and have a certificate containing required information for the interstate transport of bison. (See the February 3, 1993, entry.)

July 16, 1993: The USDA cited Antle for failing to provide access for inspection.

July 14, 1993: The USDA cited Antle for failing to put an adequate barrier between the public and the lions (see the note regarding a lion attack in 1991). Antle was also cited for failing to maintain records and provide a travel itinerary. The inspector also noted that Antle had been previously cited for failing to provide a program of veterinary care but still failed to provide it. The inspector wrote, "As indicated on this report the USDA licensee has failed to comply with USDA regulations and standards."

April 12, 1993: The USDA cited Antle for failing to maintain and provide records on animals and failing to provide a program of veterinary care.

March 2, 1993: The USDA cited Antle for failing to maintain a safe enclosure for two lemurs. Fluorescent lights and electrical

wire were within the animals' reach, and a fence in an exercise pen had sharp and twisted ends. Antle was also cited for failing to keep work areas in order so that they could be properly cleaned. The food trailer was littered with manure and debris. The primates lacked identification records. There was no written program of veterinary care, and medication was out of date.

February 23, 1993: The USDA filed charges against Antle for failing to conduct a required official brucellosis test and have a certificate containing required information for the interstate transport of bison.

February 21, 1993: The USDA cited Antle for incomplete veterinary records. The contact information for veterinary care while on the road was not available. The inspector also noted, "Due to the nature of the close contact the tigers and ligers have with the public some quick means of immobilization should be on hand, such as a tranquilizer gun."

May 27-28, 1992: The USDA cited Antle for failing to maintain a safe enclosure for the zebra, burro, and sheep. The corral had wire with sharp edges along the wood post. Antle was also cited for failing to provide veterinary care to the zebra, who had long cracked front hooves that were partially broken off and needed to be trimmed.

May 7, 1992: In a USDA internal memo addressing an investigation into Antle, the investigator states, "Antle's statements concerning the incidents and related problems were inconsistent in many areas. The feeling of all the investigators mentioned in this report is Antle is of questionable character. His description of the incident is inconsistent with other witnesses interviewed."

April 24, 1992: The USDA issued a 13-page report detailing its investigation into an

incident in which a model was attacked and severely bitten by a lion held by Antle while being used in a photography shoot (see October 9, 1991). The report describes the inspection of Antle's facility immediately after the incident: "Upon arrival [at Antle's facility] we were met with some resistance." Multiple violations were found and cited, including that the "lion and tiger enclosure [was] found to have a bloody stool present, the white tiger appeared to be straining to urinate, [and] Antle had no local veterinarian for emergencies." The report also notes that his permit to possess dangerous animals in Massachusetts had expired and that he was in the state illegally. A summons was issued, and Antle was instructed to leave the state within 24 hours or the animal would be seized. Antle left Massachusetts the following day after paying a \$50 fine. The USDA interviewed the model who was bitten by the lion. She stated that the animal grabbed her by the head causing injuries requiring more than 50 stitches and leaving her with two scars, one 7 inches long and the other 3 inches long.

April 1, 1992: In a sworn affidavit given to the USDA, the model who was bitten stated that she "was told I had nothing to worry about and this lion had never hurt anyone." She also testified, "The lion was acting somewhat lethargic. They had to use various techniques to keep the lion's attention such as snapping fingers or banging sticks." The model's five-day hospital stay cost approximately \$15,000 to \$20,000, and she was unable to work for two weeks. She also had to undergo a three-month series of rabies shots, as Antle did not know if the animal had been vaccinated.

March 25, 1992: A letter sent to Antle by the USDA demanded payment for the \$3,500 civil penalty previously imposed on Antle. The letter went on to say that the check that Antle had sent had already been

rejected twice by the bank because of insufficient funds.

March 24, 1992: An internal USDA memo regarding the logistics of the investigation into Antle summarized that the reason for the requests to open an investigation was because Antle “was found to be in violation ... on at least two occasions.” Antle “was exhibiting an elephant on weekends at a site other than the licensed facility.... Mr. Antle failed to supply an itinerary or notify APHIS of plans to ship exotic felines to KOREA [emphasis theirs] prior to their movement.”

March 13, 1992: A letter from the USDA to Antle stated, “On the last USDA attempted inspection of your facility ... four non-compliant items were documented which also appeared on [two] previous inspections.” These items involved veterinary care, business information, outdoor drainage, and pest control. The letter went on to say that noncompliant items found on two consecutive inspections ordinarily warrant the initiation of legal action. However, the USDA told Antle that as long as it received written assurances that he would take corrective measures, no action would be taken against him.

February 27, 1992: A USDA Report of Investigation detailed alleged violations, specifically failing to keep accurate records of acquisition and disposition of exotic animals, giving false information to an animal care inspector, and the interstate movement of animals not accompanied by proper documents. The inspector stated, “This investigation has taken a long period of time to assemble the information submitted. This in part was due to Antle presenting false and misleading information as to the location of the tiger in question.” The report states that Antle had been charged with previous violations of the AWA.

February 13, 1992: Dr. David L. Ratliff, D.M.V., wrote a letter to the USDA addressing concerns found at T.I.G.E.R.S. A monkey was found to have deep pyoderma on the tip of his tail and was placed on antibiotics. A coatimundi was found to have hair loss on his rump and tail consistent with allergic dermatitis and was placed on low-dose steroids for relief. A leopard was found to be suffering from hair loss because of excessive grooming by another leopard.

Yet another leopard had a long-term overgrooming problem not alleviated by drugs. A pig had sustained a bite and developed deep cellulitis and was put on antibiotics. A lion had bilateral alopecia on his rump because of pacing in the cage during transport from Korea. The lion also had old scars.

February 12, 1992: An internal USDA memo detailed attempts to investigate Antle about animals who were possibly being kept at his Buckingham Zoological Park in Virginia and specifically who was taking care of those animals. The investigator spoke with “Antle on at least two occasions pertaining to this matter.” On each occasion, Antle declined to name a specific caretaker at that facility and even went so far as to submit an affidavit declining to name a caretaker. This memo went on to name a second investigation that was closed for lack of evidence and a third investigation that was still pending at that time for alleged violations of the AWA.

February 11-12, 1992: The USDA cited Antle for failing to keep primate cages clean and sanitary, failing to ventilate the primate enclosure properly, failing to protect primates from the elements, failing to implement a program of environmental enrichment for the primates, failing to keep food uncontaminated, not having adequate drainage in the zebra and water buffalo enclosures, failing to handle animals in a

manner that keeps them safe, and failing to give veterinary care to several animals who required treatment. A potbellied pig was found limping after being injured by dogs, a lion had old wounds that needed to be attended to, a macaque was in the performance area with a bandaged tail, and a leopard had hair loss on his neck and apparent chronic thickened skin. Antle was also cited for failing to correct noncompliant items cited in previous inspections, including not providing adequate drainage in a guanaco pen, failing to provide proof that a veterinarian had attended to the hair loss problem on the leopard and coatimundi, failing to provide a copy of his itinerary, and not addressing the rodent problem in a leopard's den box. The inspector was also unable to inspect a transport vehicle with a broken taillight and mice in the bedding because the vehicle was off site on an exhibition.

January 22, 1992: An internal USDA memo addressed two inspections of Antle's facility and the violations that were found and noted that Antle was given an official warning. During the first inspection in July 1991, the inspector stated that Antle had not provided copies of his travel itinerary and that the Animal and Plant Health Inspection Service (APHIS) had to go through airport records to locate animals who had been shipped to Korea. APHIS also found out that Antle was exhibiting an elephant at two locations, although he had not notified anyone of the second site. The inspector also stated, "I believe there was an incident involving one of these animals injuring a person on this trip, but I have no 1st hand knowledge of this incident." During the second inspection in November 1991, multiple noncompliant items were found: There was no program for exercising the dogs nor a program of environmental enhancement for the primates, three different animal enclosures

were in need of repair, and mice were living in a leopard's bedding.

November 25, 1991: The USDA deposed the man who had taken photos of the model who was attacked by Antle's lion. In a sworn affidavit, the man stated, "I did not see it [the attack]," and he went on to say, "According to Dr. Antle ... the animal did not attack her."

November 21, 1991: An internal USDA memo detailed the difficulty of obtaining accurate records for Antle's animals.

November 19, 1991: A copy of the inspection report went into further detail regarding the multiple noncompliant items found during this inspection (see January 22, 1992). The USDA cited Antle for keeping an electric space heater in the elephant enclosure with the cord hanging within reach of the elephant when the animal is being moved. The inspector noted that he was concerned about the safety of having an electric heater in general and in barns in particular. In addition, the inspector said that the space heater was left on even when no attendant was present. Antle was also cited for failing to maintain the zebra, primate, and leopard enclosures to protect the animals from injury, not having reliable electric power, failing to store bedding to prevent contamination, failing to provide adequate drainage, failing to keep the primates' food receptacles clean (algae was found inside a bucket), failing to clean the coatimundi cage, failing to clean the performance and holding areas, and not addressing pest control (mice were living in the bedding of the transport vehicle, and flies were evident in the nursery). The USDA also found that Antle had not provided proof that a leopard who was suffering from chronic hair loss and a coatimundi whose coat was in poor condition had been seen by a veterinarian.

Antle's transport vehicles had multiple problems: a broken taillight, broken mirrors, and unstable construction. Also during this inspection, the USDA cited Antle for failing to correct items that were found noncompliant during previous inspections: Several animal enclosures were in need of repair, mice were still living in the leopard's bedding, and there still was no program of exercise for the dogs nor a program of environmental enrichment for the primates.

October 30, 1991: An internal USDA memo from the sector supervisor of animal care to the sector supervisor of USDA regulatory enforcement requested that an investigation into Antle's alleged violations of the AWA be undertaken.

October 22, 1991: A three-page USDA consent decision ordered Antle to pay a \$3,500 civil penalty for allegedly violating the AWA. (See the September 6, 1991, entry.)

October 11, 1991: The USDA cited Antle for failing to provide a mountain lion, two tigers, and a lion with clean water (the containers were "rusty old frying pans and/or dirty"), failing to keep enclosures free of debris, failing to identify transport vehicles properly, and failing to keep transport vehicles clean. Antle was also cited for failing to provide a lion and a tiger with veterinary care (see the April 24, 1992, entry) and failing to maintain required records.

October 9, 1991: A lion who was being used by Antle in a photo shoot attacked a model. Local, state, and federal law-enforcement agencies responded (see The April 24, 1992, entry). The report issued by local police further detailed the situation. When local police arrived at the scene, a vehicle with an unknown driver and passenger were leaving. The police stopped

the vehicle and ordered the driver to return to the scene.

The order was met with resistance. The police followed the vehicle back to the site, and it was then ascertained that the passenger was Antle. Antle told the officer that "he did not know what the big deal was about." The officer questioned Antle as to why he was in such a hurry to leave. Antle said that "he did not want to get invol[v]ed with the press." The police were told that the lion had been vaccinated for rabies. When the officer went to the hospital to take a report, he was told that information given to the police earlier had been false: The attending physician told the officer that no rabies vaccination for lions exists. The doctor said that it was imperative that it be determined what shots or vaccinations the lion had received.

Police efforts to contact personnel at the Buckingham Zoological Park (Antle's business of record) for a record search were futile as were efforts to contact Antle himself. The police put out a bulletin to be on the lookout for Antle's vehicle, as it was known he was leaving the area. The sheriff's department later learned of Antle's new facility in Tennessee, but efforts to contact Antle were still unsuccessful. The department also received information that Antle was operating under suspension in Virginia and that "he is of questionable character." Two days later, on October 11, 1991, Antle was located and gave a statement in which he claimed that the lion's "front tooth grazed the head of the girl At no time did the lion actually attack the girl." He went on to swear that the "lion was playing and pushed the girl with his foot toward himself." A two-page report issued by the Animal Rescue League of Boston details its own investigation into the lion attack. Immediately after being called to the scene, inspectors found that the cougar, lion cub, hawk, and eagle were without water.

The containers for the lion and tiger were “very small,” and the water for the white tiger was in a “rusted pan.”

After Antle was read the Miranda warning, he said that he had nothing to hide and gave the following statements. When it was explained to him that on more than one occasion, he and his staff were seen striking the animals with a closed fist, Antle admitted that striking animals was his training technique and that it’s cruel only if one caused visible damage. It was also pointed out that during exhibitions, the animals had no water. He replied that providing water would lead to messes, but he provided animals with water off site every two to three hours. The inspectors also noted that the cages that the animals were kept in failed to protect them from the elements. Antle replied that the shelter was sufficient. This report confirmed that Antle was issued a violation for having an expired permit and was fined \$50 and ordered to leave the state.

September 23 and 24, 1991: The USDA cited Antle for multiple violations, including failing to provide dogs with an exercise plan, failing to provide primates with a program of environmental enrichment, failing to provide a monkey with enough space to stand erect with the animal’s arms in the air, failing to provide a young zebra with an adequate diet, failing to provide an unhealthy young zebra with veterinary care, failing to provide wholesome food, failing to provide the animals with structurally safe and sound housing, failing to protect food from contamination, failing to provide adequate drainage, failing to keep the area clean, and failing to provide adequate pest control.

September 6, 1991: The USDA notified Antle that a complaint had been filed that charged him with alleged violations of the AWA, including failing to maintain housing in a structurally sound condition and in good

repair, failing to store food and bedding properly, failing to provide rapid elimination of excess water from indoor housing facilities, failing to clean primary enclosures, and failing to maintain records.

July 16, 1991: The USDA cited Antle for multiple violations, including failing to provide the animals with structurally safe and sound housing, failing to provide adequate ventilation, failing to protect food and bedding from contamination, failing to protect animals from predators (a monkey was kept next to a coyote, and a baboon was kept next to a jaguar, which led the baboon to bite his own legs), failing to provide adequate lighting (a tiger was able to turn off the lights), failing to keep food receptacles clean, failing to provide adequate water, failing to clean water receptacles (frying pans and buckets that were used were dirty and/or rusty), failing to keep enclosures clean, failing to keep facilities and grounds clean and in good repair, failing to provide adequate pest control, failing to maintain structural strength (the inspector noted that there was no fence to keep the elephant from running onto the highway if the handler lost control), failing to provide animals with shade, failing to provide animals with protection from the elements, and failing to notify APHIS of an elephant who was being exhibited at a second site. The USDA also cited Antle for failing to provide an approved program of veterinary care, failing to provide a copy of his itinerary, failing to keep transport trailers structurally sound and in good repair, failing to handle animals in a careful manner, failing to identify dogs properly, and failing to provide any records for inspection.

July 11, 1991: An article in *The Knoxville Journal* chronicled Antle’s involvement with various local, state, and federal authorities while operating T.I.G.E.R.S. in Tennessee.

May 16, 1991: An internal USDA document stated, "Evidence in the report shows that Mr. Antle is operating as an exhibitor as defined in the AWA without having obtained a license. ... It is apparent that Mr. Antle has no respect towards the AWA and regulations since he has continued to ignore the instructions given to him by USDA officials." Two weeks later, Antle was issued an exhibitor's license.

May 7, 1991: In a third pre-license inspection, the USDA cited Antle for having no perimeter fence to contain the elephant or to protect the animal from predators or vandals. Antle also failed to provide the primates with adequate lighting and failed to provide an adequate source of water. He was also told that he was required to provide the primates with a program of environmental enrichment. The inspector noted that the "applicant has failed to meet all the standards for licensing." Three weeks later, Antle was issued an exhibitor's license.

April 26, 1991: The USDA issued a report detailing Antle's alleged violations of the AWA. The report stated, "It is apparent that [Antle] ... is exhibiting wild and exotic animals without an exhibitor license as required by the Animal Welfare Act." The report detailed multiple examples.

March 21, 1991: The USDA cited Antle for failing to provide access for inspection.

March 12, 1991: In his second pre-license inspection, the USDA cited Antle for failing to maintain adequate structural strength of the facilities, failing to provide the primates with heat (a violation noted on the previous inspection and not yet corrected), failing to have a veterinarian, failing to have adequate protection between the animals and the public, exposing animals to possible drowning by having a moat as a public barrier, and failing to have a restroom, sink,

or soap available. The inspector also noted that Antle was also keeping animals at a different facility, which also needed to be inspected and approved of before licensing.

January 14, 1991: An internal USDA document "recommend[ed] civil prosecution" against Antle for "a violation of the Act."

December 5, 1990: A three-page memo written by a USDA inspector detailed efforts to investigate complaints that Antle had been holding photo sessions with tigers in Tennessee. In the section titled "Background," the inspector stated, "Mr. Antle came to Tenn. from Buckingham, Va. where there were incidents we had questions about. One was an alleged tiger bite to someone at his facility. Another was an alleged violation re some animals left behind at Buckingham, Va. when he came to Tenn." He went on to note, "There is apparently some problems with USDI re endangered species permits." The inspector stated, "Mr. Antle ... was associated with Nashville Zoo... Apparently, he was later asked to leave." The inspector closed his report by stating, "I am concerned about the well-being of these animals. In this case, I am perhaps more concerned about the safety of the public. Some very dangerous animals are involved. Mr. Antle seems to pay no attention to what I tell him."

October 6, 1990: Antle held a photo session in Sevier County, Tennessee. An arrest warrant was subsequently issued charging Antle with allowing direct contact between dangerous animals and the public. An article in *The Journal* stated that Antle had been the subject of investigations by the Tennessee Wildlife Resources Agency as well as the USDA and "had been targeted with several lawsuits."

September 28, 1990: An internal USDA memo documented a violation of the AWA

by Antle and stated, "Mr. Antle has recently received official notification and Warnings of Violations of Federal Regulations for similar violations and continues to disregard Standards of the Animal Welfare Act."

August 21, 1990: The USDA issued a report detailing Antle's alleged violations. An inspector had visited Antle's Virginia facility in December 1989 and found no one on the premises. She was unable to enter the facility and noted that there was no evidence of recent activity (undisturbed snowfall allowed the inspectors to determine that no one had been at the premises for at least 19 days). The inspector and a witness observed two deer, two peacocks, and a peahen within the compound. The only food available was soiled hay. The inspector contacted state authorities to request an investigation.

April 18, 1990: The state warden who investigated Antle's apparently abandoned compound (see above) stated in a sworn affidavit that on his first visit, he saw no deer but did observe deer tracks. On his second visit, he observed two deer. On subsequent visits, he sometimes saw deer and sometimes did not. He did find a hole in the perimeter fence. He also found one dead peacock and one living peacock. The warden stated, "I did not observe anyone at the compound nor did it appear anyone was feeding the deer and peacock, regularly."

April 13, 1990: The USDA sent Antle a letter telling him that because he had failed to submit his license renewal forms and fees, his license had been terminated.

March 28, 1990: In a sworn affidavit to the USDA, Antle stated that he was unaware that he was in violation of the AWA. He noted that he had "[o]nce before" received a warning from the USDA for failing to provide copies of his travel itineraries and that "once" a trainer at his zoo in Virginia had hit

a tiger in the mouth and cut his hand, later telling the USDA that the tiger had bit him. He added that the USDA "dropped the allegations."

March 20, 1990: An internal USDA memo confirmed additional information had been provided to allow an investigation into Antle to proceed.

March 9, 1990: The USDA cited Antle for failing to allow access for inspection by having no personnel present at the facility.

March 6, 1990: An internal USDA memo requested additional information be provided to proceed with an investigation into Antle.

January 24, 1990: In a first pre-license inspection, the USDA cited Antle for failing to provide animals with protection from the cold weather (the primates had no source of heat) and having a veterinarian with little experience in exotic animal care. The inspector stated, "I do not feel [the veterinarian] could fulfill the qualifications of attending veterinarian if he were the only one servicing this facility." The inspector concluded his report by saying, "The Antle facility is far from complete."

December 27, 1989: The USDA cited Antle for failing to allow access for inspection by having no personnel present at the facility.

August 14, 1989: The USDA issued an Official Notification and Warning of Violation of Federal Regulations to Antle for failing to provide travel itineraries and maintain records. The notice stated, "These are reoccurring discrepancies."

March 15, 1989: The USDA cited Antle for failing to maintain the structural strength of a perimeter fence and failing to provide records.

June 17, 1988: The USDA cited Antle for failing to maintain adequate drainage. The inspector also reiterated to Antle that he must make his facility available for inspection and that complete records must be maintained. The inspector noted, “A calendar date should be given as to correction on records deficiency. (This problem was also noted on 3/24/88 inspection.)”

March 24, 1988: The USDA cited Antle for not maintaining structural strength of the animal enclosures, failing to protect food from contamination, and failing to clean excreta from enclosures. Antle was also cited for failing to provide copies of his records or travel itinerary.

August 28, 1987: The USDA sent Antle a letter stating, “We are advised that on February 28, 1986, a tiger which you were handling severely injured [a man in] Studio City, California. . . . We have decided to maintain a record of this incident in our files, but to take no further action at this time.”