

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

BIG CAT RESCUE CORP.,
a Florida not for profit corporation,

Plaintiff,

-vs-

CASE NO. 8:11-cv-209-MSS-MAP

BIG CAT RESCUE ENTERTAINMENT
GROUP, INC., et al.,

Defendants.
_____ /

DEPOSITION OF: CAROLE BASKIN
DATE TAKEN: Monday, June 4, 2012
TIME: 9:11 a.m. to 1:58 p.m.
PLACE: Johnson Pope Bokor Ruppel & Burns
403 East Madison Street
Suite 400
Tampa, Florida
REPORTED BY: Beverly Replogle
Notary Public

ORIGINAL

JUN 23 2012

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17 Appearing on behalf of the Defendants

18 ALSO PRESENT:

19 Howard Baskin
20 John Finlay
21 Joe Schreibvogel

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1 THE COURT REPORTER: Do you swear or affirm
2 that the testimony you are about to give in this
3 cause will be the truth, the whole truth, and
4 nothing but the truth?

5 THE WITNESS: I affirm it to be the truth.

6 CAROLE BASKIN,
7 having been first duly sworn, was examined and testified
8 upon her oath as follows:

9 DIRECT EXAMINATION

10 BY MR. PINKARD:

11 Q Will you tell us your name and address, please?

12 A **Carole Baskin, 12802 Easy Street, Tampa, Florida**
13 **33625.**

14 Q Have you ever had your deposition taken before?

15 A **Yes.**

16 Q I believe you have in a companion case. Same
17 rules will apply today. I'll ask you some questions and
18 if I ask you a question you don't understand, let me know
19 and I'll rephrase the question.

20 A **Okay.**

21 Q What is your current occupation?

22 A **I buy and sell real estate.**

23 Q Do you work for a company, or do you have your
24 own company?

25 A **It doesn't really have a company name.**

1 Q So you are a licensed real estate agent?

2 A No.

3 Q Okay. You buy and sell real estate -- or
4 explain to me when you say you're in the real estate
5 business, what is it that you're doing?

6 A I buy real estate and I sell real estate.

7 Q Okay. And do you do that on your own, or do you
8 have some investors that help you with that, or how does
9 that work?

10 A I do that on my own.

11 Q And is that primarily in Hillsborough County or
12 other places?

13 A Five counties.

14 Q How long have you been engaging in that
15 business?

16 A Since the '80s.

17 Q Okay. You say five counties. Do you own real
18 estate in five different counties currently?

19 A Yes.

20 Q And which five counties are you referring to?

21 A Hillsborough, Pasco, Pinellas, Polk, and
22 Hernando.

23 Q And rough estimate, how many different pieces of
24 property do you own within those five-county area?

25 A I don't know.

1 Q All right. At least five, I guess, if you've
2 got one in each county?

3 A Yes.

4 Q Okay. More or less than ten?

5 A More.

6 Q And do you have these properties rented out?

7 A Some are rented. Some are mortgages.

8 Q And are these properties in your name?

9 A They are typically in trusts.

10 Q What's the name of the trust?

11 A There's a separate trust for each property.

12 Q Do you also own the property that -- whereupon
13 Big Cat Rescue sits?

14 A I used to.

15 Q Who owns the property now?

16 A I donated it to the nonprofit back -- the
17 original 40 acres or 42.5 acres. I donated it to the
18 nonprofit back in the '90s.

19 Q So it's owned by Big Cat Rescue Corporation now?

20 A Yes.

21 Q Just that entity or any other entities?

22 A I believe that the title may still be in our
23 previous name of Wildlife on Easy Street, but that was
24 merged into Big Cat Rescue.

25 Q What is your position with Big Cat Rescue

1 Corporation?

2 **A I am the founder and CEO.**

3 Q Is that a nonprofit corporation?

4 **A Yes.**

5 Q When it files tax returns, it files as a
6 nonprofit corporation?

7 **A Yes.**

8 Q When was it incorporated?

9 **A Wildlife on Easy Street was incorporated in**
10 **1995.**

11 Q And when was Big Cat Rescue Corporation
12 incorporated?

13 **A I think it was 2003 or 2004.**

14 Q Are you an officer or registered agent of any
15 other corporations?

16 **A Yes.**

17 Q Can you recall what the names of those other
18 corporations are?

19 **A I couldn't begin to name them.**

20 Q Do some of them carry the name of Big Cat in
21 some form or another within the name?

22 **A Most of them.**

23 Q All right. Are any of those for-profit
24 corporations?

25 **A They aren't corporations -- for the most part**

1 **they're not corporations that are actively doing**
2 **anything. They're registered with the Department of**
3 **Corporations to register the names.**

4 Q All right. So none of the other corporate
5 entities that you're an officer of have any ownership
6 interest in the sanctuary or the park known as Big Cat
7 Rescue?

8 A **I wouldn't say none of them.**

9 Q Can you identify which of them would have an
10 ownership interest?

11 A **Return to Eden at one point owned part of the**
12 **property. I'm not sure how that's titled currently.**

13 Q What is Return to Eden?

14 A **It is a nonprofit corporation.**

15 Q And does Return to Eden still own part of the
16 property?

17 A **It might.**

18 Q Do you recall how much of the property it may
19 have owned at one point in time?

20 A **20 acres.**

21 Q What was the reasoning behind that, that entity
22 owned 20 acres and the rest of it was owned by Big Cat
23 Rescue?

24 A **At the time we needed alternative access from**
25 **the south end of our property; and to be able to do that,**

1 it had to be through a separate entity than the main
2 entity. It was a real estate reason.

3 Q Do you recall when that may have happened that
4 it was -- or was it in that entity's name from the
5 beginning, or did that occur later?

6 A I don't know how far back that went. To answer
7 your question, I believe the property was originally in
8 the name of Wildlife on Easy Street, but I'm not certain
9 of that.

10 Q Are there other officers of Big Cat Rescue
11 Corporation currently?

12 A Yes.

13 Q Who are they?

14 A All of those would be available through Sun Biz.
15 I believe the officers are Howard Baskin, Jamie Murdock.
16 I'm just not sure, but that's an easy-enough thing for
17 you to pull up online and find out. I know what's online
18 is accurate.

19 Q Who is Jamie Murdock?

20 A She's my daughter.

21 Q Does she participate in the Big Cat Rescue
22 Corporation?

23 A Yes.

24 Q In what way?

25 A She's our president.

1 Q Does she involve herself in the day-to-day
2 management of the park?

3 A Yes.

4 Q Okay. She have an office at the park?

5 A Yes.

6 Q All right. And what would be her particular
7 duties at the park?

8 A She edits our newsletter. She does the
9 oversight of the animal care. She's licensed as a
10 wildlife rehabber. She does a lot of our ads and
11 photography, graphics work.

12 Q And when you're referring to the newsletter, are
13 you talking about the Big Cat Times?

14 A Yes.

15 Q Is she the one that designed the snow leopard
16 banner that appears on the website?

17 A Yes.

18 Q Do you recall when she did that?

19 A No.

20 Q Do you know any of the details of where she got
21 the picture from or how it came into production, that
22 particular snow leopard picture?

23 A It was one of our snow leopards.

24 Q So part of the process would have been taking a
25 photograph of one of your snow leopards?

1 **A Right.**

2 Q And that would have been done by your daughter?

3 **A Right.**

4 Q Did you supervise that activity, or were you
5 involved in it in any way?

6 **A Yes.**

7 Q Okay. What was your involvement in it?

8 **A I tell her what I want done, and she magically
9 creates it.**

10 Q So at some point you decided you wanted a
11 picture of a snow leopard?

12 **A I don't recall if it was specifically a snow
13 leopard. What I wanted were eyes.**

14 Q All right. Any recollection about when that
15 would have happened that you wanted the eyes on the
16 website?

17 **A I'm guessing it would have been around 2003, but
18 that's just a guess.**

19 Q So the best of your recollection, the snow
20 leopard eyes have been part of the website since 2003?

21 **A It was on our blog before it was ever on our
22 website.**

23 Q I'm sorry. You're saying on the what?

24 **A It was on our blog before it was ever on our
25 website, our main website.**

1 Q Prior to 2003?

2 A I don't know.

3 Q All right. So she went out and took a picture
4 of a snow leopard at some point. And then did she bring
5 you back different versions of how the eyes looked, or do
6 you remember how you made a final decision on the version
7 that appears on the website?

8 A I don't remember.

9 Q All right. Did she also photograph other cat
10 eyes for the website?

11 A Yes.

12 Q All right. And which other cats -- what other
13 type of cats were photographed?

14 A Bobcats, caraculs, Canada lynx, tigers, servals,
15 s-e-r-v-a-l-s.

16 MR. JAKES: What was the second one?

17 THE WITNESS: C-a-r-a-c-a-l-s (sic).

18 A Fishing cats, clouded leopards.

19 BY MR. PINKARD:

20 Q All right. I've got five different kind of
21 cats. Does that sound about right?

22 A No, it would be more than that.

23 Q All right.

24 A It was all of the cats that we had. They're a
25 rotating banner currently.

1 Q So currently the eyes of all of those different
2 variety of cats appear on your website?

3 A Yes.

4 Q Not just the snow leopard eyes?

5 A Correct.

6 Q And by "rotating," you mean if you go on the
7 website and you click at different things on the
8 website -- for example, if you want to make a donation --
9 one of the cats will appear on that section, cat eyes?
10 And then if you go to a different, like if you want to
11 buy something from the shop, it will have a different
12 cat's eyes. Is that what you mean by "rotating"?

13 A No. What happens is each time the page is
14 refreshed, there's a different set of eyes. So it could
15 be the same page that each time you visit that page, you
16 would see a different set of eyes.

17 Q So if I went on your website, I would see -- if
18 I clicked into those different areas I referred to -- for
19 example, if I started out on the home part of it and I
20 wanted to make a donation, I would see the same eyes on
21 the home and the donation?

22 A No, because the page will be different when you
23 click for a different page.

24 Q Does the snow leopard eyes appear with any more
25 regularity than the other eyes currently on the website?

1 **A I don't know.**

2 Q Has that been the way the website has always
3 operated vis-a-vis the cat eyes?

4 **A No.**

5 Q How long has it been operating that way?

6 **A Maybe since last year.**

7 Q All right. How did it used to operate?

8 **A It was just the snow leopard eyes before.**

9 Q And when you say "last year," can you be more
10 specific as to when that change occurred? Was it at the
11 beginning of the year? End of the year? Middle of the
12 year?

13 **A I really couldn't say.**

14 Q All right. Why was that change made?

15 **A Because the technology enabled that. We
16 couldn't do it before.**

17 Q All right.

18 (Mr. Baskin left the room.)

19 BY MR. PINKARD:

20 Q "The technology" being the rotating cat eyes?

21 **A (Witness nods head.)**

22 Q Okay. Do you have a consultant that works on
23 your website, or do you do it in-house?

24 **A Both.**

25 Q All right. Who is it that works on the website

1 in-house?

2 **A I do.**

3 Q And when I say "work on it," I mean design
4 things like putting the snow leopard eyes on the website?

5 **A That's me.**

6 Q Okay. And there's somebody on the outside that
7 you also consult with?

8 **A I wouldn't call it consulting, but I outsource
9 tedious work.**

10 Q And what do you mean by "tedious work"?

11 **A Our entire website has undergone a huge change,
12 and there are close to 9,000 pages that had to be
13 reformatted.**

14 Q As far as the format of the home page when you
15 first click on the website, is that -- was that altered
16 last year also --

17 **A I think it's altered daily.**

18 Q -- other than the cat eyes?

19 It's altered daily?

20 **A (Witness nods head.)**

21 Q Contentwise it's altered daily; but as far as
22 the format of it, is it the same daily or different?

23 **A The layout is the same.**

24 Q And when you say "it changes daily," it means
25 there would be different news about cats and whatnot on

1 there when you click on there, like there might be -- I
2 think there's a Father's Day thing on there now, so it
3 changes daily for those reasons?

4 **A Correct.**

5 Q Okay. The cats that you talked about that have
6 their eye pictures on the website, were the photographs
7 of those cats taken on different days or the same day?

8 **A I'm guessing it would be different days.**

9 MR. JAKES: Don't want you to guess. If
10 you know, testify.

11 **A I don't know.**

12 BY MR. PINKARD:

13 Q During the period of time that only the snow
14 leopard eyes were on the website, did you have available
15 to you the pictures of the other cats also? Had your
16 daughter already taken those photographs?

17 **A I don't know.**

18 Q So if I wanted to know when the photographs were
19 taken, I would have to ask her?

20 **A If she would even know.**

21 Q Were you with her during any of the times she
22 was taking the photographs of the cat eyes?

23 **A I don't know.**

24 Q All right. Is that an easy thing to accomplish,
25 to take photographs of cat eyes like that where you get

1 the straight-on shot of the cat?

2 **A Depends on the photographer.**

3 Q Well, if the photographer is your daughter, is
4 it something she commonly does?

5 **A Yes.**

6 **(Mr. Baskin entered the room.)**

7 BY MR. PINKARD:

8 Q Do you know whether or not when this lawsuit was
9 filed whether you had the -- only the snow leopard on the
10 website or whether you had the other cat eyes on the
11 website?

12 **A I don't know.**

13 Q Can you tell by looking at the cat-eye banner
14 which particular cat that's on your sanctuary that those
15 eyes belong to?

16 **A Some of them.**

17 Q The place where you are, do you call it a
18 sanctuary or a park? I keep referring to it as a park.
19 What's the proper name for it?

20 **A Sanctuary.**

21 Q Sanctuary.

22 Okay. At the sanctuary does each cat have a
23 name?

24 **A Yes.**

25 Q All right. Do you know the name of the cat for

1 which the eyes that are on the website belongs to?

2 **A No.**

3 MR. JAKES: Was that currently or were you
4 speaking of the snow leopard?

5 THE WITNESS: Oh, I assumed he meant the
6 snow leopard. I shouldn't assume.

7 BY MR. PINKARD:

8 Q The snow leopard.

9 **A No.**

10 Q How many snow leopards do you have?

11 **A None.**

12 Q None at this time?

13 **A Correct.**

14 Q Okay. Well, you must have had a snow leopard
15 when the picture was taken. What happened to the snow
16 leopard that -- whose eyes appear on the website?

17 **A Like I said, I don't know which one it was, but
18 all three of them have since died.**

19 Q Do you recall when that happened?

20 MR. JAKES: What happened?

21 MR. PINKARD: When the three snow leopards
22 died.

23 MR. JAKES: Assuming they all died at the
24 same time.

25 MR. PINKARD: Okay. Right.

1 BY MR. PINKARD:

2 Q Well, I'm not going to assume they all died at
3 the same time, but when did the snow leopards pass away?

4 A The most recent would have been over a year ago,
5 and the one before that, probably a year prior. The
6 first one died many years ago.

7 Q I'm sorry. I didn't hear what you said.

8 A The first one died many years ago.

9 Q Many years ago.

10 All right. Did you acquire all three snow
11 leopards at the same time?

12 A No.

13 MR. PINKARD: All right. I'll tell you, I
14 could use some water.

15 MR. JAKES: Could you use some water?

16 We've got it.

17 MR. PINKARD: Oh, there we go. Sorry.

18 (There was an off-the-record discussion.)

19 BY MR. PINKARD:

20 Q Does there exist records at the sanctuary which
21 would indicate when you acquired the three snow leopards?

22 A Yes.

23 Q What kind of records would those be?

24 A What do you mean?

25 Q Well, you say there's records that would show

1 when you acquired the snow leopards. I just want to know
2 what records you're referring to.

3 **A We have a digital record of our animals.**

4 Q Okay. What is contained in the digital record?

5 **A The animal's name, date of birth, microchip, if
6 there is one, their sex, where they came from.**

7 Q And those records are at the sanctuary?

8 **A Yes.**

9 Q Are they computerized records?

10 **A Yes.**

11 Q All right. And when an animal passes away at
12 the sanctuary, is there a record of that?

13 **A Yes.**

14 Q What kind of record would be kept other than the
15 record that the animal has passed?

16 **A Their veterinary reports, necropsy.**

17 Q Necropsy is like an autopsy but for a cat?

18 **A Yes.**

19 Q And who performs those at the sanctuary?

20 **A Our veterinarian.**

21 Q And what's the name of the veterinarian?

22 **A Dr. Liz Wynn.**

23 MR. JAKES: Spell the last name.

24 THE WITNESS: W-y-n-n.

25 BY MR. PINKARD:

1 Q Is that the only veterinarian that cares for the
2 animals at the sanctuary?

3 A No.

4 Q Is that the only vet that prepares the necropsy
5 reports?

6 A No.

7 Q Does Dr. Wynn work only for Big Cat Rescue or
8 does she do other veterinary work?

9 A She has her own private practice.

10 Q Do you remember where you got the three snow
11 leopards from?

12 A They came from Mark McCarthy.

13 Q Who is Mark McCarthy?

14 A He has big cats over on the other coast, I
15 believe, the other coast of Florida.

16 Q Does he have a sanctuary?

17 A I don't know what he calls it.

18 Q How many cats does he have?

19 A I don't know.

20 Q And all three of the snow leopards that have
21 been at the sanctuary came from Mr. McCarthy?

22 A Yes.

23 Q And what was the reason that Mr. McCarthy sent
24 the snow leopards over to your sanctuary?

25 A That was a dealing between him and my late

1 **husband.**

2 Q So you don't have any knowledge of the dealings?
3 That was between Mr. McCarthy and your late husband?

4 A **It's been so long ago. I'm sorry. I'm nodding**
5 **my head.**

6 Q Would the acquisition of the three snow leopards
7 be considered a rescue?

8 A **I don't think so.**

9 Q What was your late husband's name?

10 A **Don Lewis, L-e-w-i-s.**

11 Q What year did he pass?

12 A **He disappeared in '97.**

13 Q So would it -- would that mean that the snow
14 leopards would have had to have been acquired either in
15 '97 or some year prior to '97?

16 A **One of them was in '97. I'm not sure if the**
17 **other two were in '97 or '98. I think they were in '98.**

18 Q Well, if they were in '98, then Mr. Lewis
19 couldn't have been involved in that, because he had
20 disappeared at that time?

21 A **He had already made the arrangements.**

22 Q I see. Okay. Do you know whether he purchased
23 any of the three snow leopards?

24 MR. JAKES: For the record, I've been
25 giving you a fairly wide berth here, but I don't

1 see how issues regarding the acquisition of any
2 particular cats, even the snow leopards, are
3 pertinent to the trademark claims in our -- in
4 our complaint, nor do I see how they could
5 relate to the libel or tortious interference of
6 the counterclaim. So either tie them
7 together -- I mean, I think she's already
8 testified regarding the photograph in question
9 on the website, so I'm not sure how the
10 acquisition in the '90s could have any
11 pertinence to the issues in the case.

12 MR. PINKARD: Okay. I note your objection,
13 but I disagree with it. Are you telling her
14 she's not going to answer that question or --

15 MR. JAKES: Well, I'm going to let her
16 answer that question, but we may have to
17 terminate if we're going to go over issues that
18 have no bearing on the claims in the case.

19 MR. PINKARD: Okay. I disagree as to the
20 bearing. I think the origin of the leopard
21 that's in the picture in this lawsuit is
22 exceedingly relevant.

23 MR. JAKES: Because?

24 MR. PINKARD: Because of the claims your
25 client has made against my client and also as to

1 the fact that she has claimed it's the focal
2 point of Big Cat Rescue.

3 MR. JAKES: The photograph on the website,
4 not the acquisition of the cat.

5 MR. PINKARD: Well, if you're going to make
6 claims about what Joe does and you've got a cat
7 that's the focal point of your website that may
8 have been purchased, then I think it's relevant.

9 MR. JAKES: The trademark claim doesn't
10 have anything to do with the acquisition of the
11 cat. The trademark claim has to do with the
12 allegation that your clients attempted to trade
13 off or pass themselves off as affiliated or
14 connected to Big Cat Rescue. So I -- we have
15 made -- that's the claims we've made in this
16 case.

17 You say we've made claims about
18 Mr. Schreibvogel. I don't know what you're
19 speaking to other than that.

20 MR. PINKARD: Okay. I note your objection
21 and I guess we'll have to allow the judge to
22 decide that at some point, but --

23 MR. JAKES: The question is how -- how
24 quickly we're going to let the judge decide it.
25 So I'll let her answer that question and let's

1 see if we can move into areas that are a little
2 bit more germane to the case.

3 MR. PINKARD: All right. Well, I disagree
4 with your assessment as to the level that this
5 is germane to the case. I think it's essential
6 to the case.

7 BY MR. PINKARD:

8 Q But do you know whether the snow leopards were
9 purchased?

10 A That was between my husband and Mr. McCarthy. I
11 was not present.

12 Q Would there be records at the sanctuary that
13 would indicate whether the three snow leopards were
14 purchased?

15 A I don't think so.

16 Q How about the records that you referred to
17 before that would say where the cat came from, the sex of
18 the cat, age of the cat, those kind of things; they
19 wouldn't also reflect whether it was purchased or not?

20 A No.

21 Q If you did purchase the snow leopards, would you
22 have done it by check or credit card or cash? How would
23 you have done it?

24 MR. JAKES: Objection; calls for
25 speculation; immaterial to the case and

1 bordering on harassment. Go ahead.

2 THE WITNESS: Except that I wouldn't know.

3 MR. JAKES: Go ahead, if you can answer it.

4 **A I don't know.**

5 BY MR. PINKARD:

6 Q Was one of the snow leopards named Hercules?

7 **A Yes.**

8 Q Do you know whether Hercules is the snow leopard
9 that's depicted on the website?

10 **A I don't know.**

11 Q Did you consider the snow leopard eyes to be the
12 focal point of the advertising for Big Cat Rescue
13 Corporation?

14 **A We used it on our banners.**

15 Q But did you consider it to be the focal point?

16 **A It, in combination with our logo.**

17 Q Now, when you say "logo," you're talking about
18 the registered trademark logo, the tiger?

19 **A Yes.**

20 Q It was used in concert with the snow leopard
21 eyes?

22 **A Yes.**

23 Q And those two things together form the focal
24 point of the advertisement of Big Cat Rescue?

25 **A I'm not sure what you're getting at with "focal**

1 **point."**

2 Q Well, it's in your lawsuit.

3 MR. JAKES: It's in the lawsuit of Big Cat
4 Rescue. You're taking the deposition of
5 Carole Baskin.

6 BY MR. PINKARD:

7 Q Okay. It's in the lawsuit of Big Cat Rescue.
8 Did you ever read the lawsuit?

9 **A Yes.**

10 Q If the snow leopard eyes in concert with the
11 logo has been the focal point of the website, why did you
12 add the other eyes of the other animals?

13 **A As I said, the technology enabled us to do that.**

14 Q So did that change the focal point of the
15 website from snow leopard eyes to snow leopard eyes plus
16 four other types of cats?

17 **A I guess. I am not sure what you're asking me.**

18 MR. JAKES: Well, if you're not sure what
19 he's asking, don't guess.

20 THE WITNESS: I'm sorry.

21 BY MR. PINKARD:

22 Q Did you ever purchase snow leopards where you
23 signed for the -- you signed the paperwork from the
24 United States Department of Agriculture concerning the
25 snow leopards?

1 **A** **I don't recall purchasing them. I may have**
2 **signed the transfer papers.**

3 **Q** **Okay. When you say "transfer paper," what are**
4 **you referring to?**

5 **A** **When a cat arrives, there is a piece of paper**
6 **that is required for the transfer that would have the**
7 **person transferring, the person receiving the animal, and**
8 **a description of the animal.**

9 **Q** **Have you had only three snow leopards at the**
10 **sanctuary, or you had more than that?**

11 **A** **Only three.**

12 **Q** **Do you still get other animals from McCarthy**
13 **Wildlife Center?**

14 **A** **No.**

15 **Q** **Back in 1997 who was handling the announcements**
16 **at the Cat Tales?**

17 **A** **Typically I would write the articles for the**
18 **newsletter. My daughter would edit them and turn them**
19 **into the newsletters.**

20 **Q** **All right. So if you see an announcement on the**
21 **Cat Tales newsletter, more than likely you were the one**
22 **that wrote it?**

23 **A** **More than likely.**

24 **Q** **And that would have been the case since the**
25 **newsletter came into existence?**

1 **A Yes.**

2 Q All right. Do you remember when the newsletter
3 came into existence?

4 **A I don't.**

5 Q As part of your duties for Big Cat Rescue
6 Corporation, do you advocate for various pieces of
7 legislation throughout the country?

8 **A More as my activity as an individual.**

9 Q What kind of activities do you engage with -- do
10 you engage in vis-a-vis legislation and big cats?

11 **A I research the issues. I share that**
12 **information. I contact legislators, decision-makers.**

13 Q What kind of legislation do you support in
14 particular?

15 **A I support legislation that ends the trade in**
16 **exotic cats as pets, props, and for their parts.**

17 Q How often do you engage in that activity?

18 **A Frequently.**

19 Q And when you say "frequently," could you
20 quantify it? Like on a monthly basis how often would you
21 be involved in that kind of activity?

22 MR. JAKES: If you're capable of doing
23 that.

24 **A At least weekly.**

25 BY MR. PINKARD:

1 Q And how many different states have you been
2 involved with concerning the legislation?

3 A I don't know.

4 Q And you say you've been doing that in your
5 individual capacity. What do you mean by that?

6 A I'm not paid by the sanctuary.

7 Q You mean you're not paid by the sanctuary for
8 that activity?

9 A I'm not paid at all.

10 Q When you do this work concerning the
11 legislation, do you use the name Big Cat Rescue
12 Corporation?

13 A In addition to my own name, yes.

14 Q And when you say "against the trade of exotic
15 cats," do you mean legislation that would outlaw private
16 ownership of exotic cats?

17 A I would support a ban on the private ownership
18 of exotic cats.

19 Q Okay. Have you been doing that, though?

20 A Yes.

21 Q Okay. Have you appeared and testified before
22 legislative bodies about that topic?

23 A Yes.

24 Q And when you do so, do you say that you're the
25 president of Big Cat Rescue Corporation?

1 **A No.**

2 Q Is part of your website devoted to influencing
3 various pieces of legislation throughout the country?

4 **A Yes.**

5 MR. JAKES: And the reference to "your" was
6 Big Cat Rescue Corp's website there. Right?

7 MR. PINKARD: Yes. I'm sorry, Big Cat.
8 Right.

9 BY MR. PINKARD:

10 Q Does Big Cat Rescue Corporation pay for your
11 expenses when you go on these trips to the legislative
12 bodies?

13 **A Sometimes.**

14 Q Do you also write e-mails and letters on behalf
15 of particular pieces of legislation in various states?

16 **A Do I write e-mails and letters to who?**

17 Q For people to support particular legislation in
18 particular states.

19 **A Yes.**

20 Q And when you do so, do you refer to yourself as
21 the president of Big Cat Rescue Corporation?

22 **A I'm not the president.**

23 Q Okay. The founder?

24 **A Yes.**

25 Q CEO?

1 **A Yes.**

2 Q How long have you been engaged in that type of
3 activity vis-a-vis the legislation?

4 **A Since the '90s.**

5 Q At the sanctuary does there exist any records
6 that would show the expenses you've had in
7 the legislative efforts?

8 **A I think so.**

9 Q Was one of the reasons that you found -- one of
10 the reasons that you founded Big Cat Rescue Corporation
11 to engage in that type of activity?

12 **A No.**

13 Q Is that mentioned anywhere in the mission
14 statement of Big Cat Rescue Corporation?

15 **A Yes.**

16 Q So it's mentioned in the mission statement, but
17 you didn't have any intent in engaging in it?

18 **A We didn't know when we started what the problems
19 were.**

20 Q And Big Cat Rescue Corporation has filed tax
21 returns as a nonprofit corporation?

22 **A Your question was, Big Cat Rescue has filed --**

23 Q Tax returns as a nonprofit corporation.

24 **A Yes.**

25 Q Was there an amendment to the corporate

1 documents in 2011 Articles of Incorporation?

2 **A I don't know.**

3 Q If that happened, then you weren't involved in
4 it?

5 **A I would have been involved. I just don't know**
6 **about it. I don't know what you're talking about, so I**
7 **don't know what you're asking me.**

8 Q You don't have any recollection of any amendment
9 to the Articles of Incorporation for Big Cat Rescue
10 Corporation in 2011?

11 **A It's possible.**

12 Q It's possible that it happened or you --

13 **A It's possible that it happened. I just don't**
14 **know.**

15 Q It's not possible? You don't have any
16 recollection of it?

17 **A I don't remember what you're asking me.**

18 Q Okay. Well, I'll be more specific just so I
19 understand your answer.

20 Do you have any recollection as you sit here
21 today about any amendments to the Articles of
22 Incorporation for Big Cat Rescue Corporation in 2011?

23 **A No.**

24 Q All right. And did I understand your testimony
25 before that you received no compensation from Big Cat

1 Rescue Corporation?

2 MR. JAKES: Objection; asked and answered.

3 BY MR. PINKARD:

4 Q Okay.

5 MR. JAKES: You can answer.

6 **A I don't receive a paycheck.**

7 BY MR. PINKARD:

8 Q And you haven't since the founding of that
9 corporation?

10 **A Correct.**

11 Q Does Mr. Baskins (sic) receive any compensation
12 from Big Cat Rescue Corporation?

13 **A Yes.**

14 MR. JAKES: And for the clarity of the
15 record there's no S at the end of the name.

16 MR. PINKARD: Oh, sorry. Mr. Baskin. My
17 apologies.

18 MR. JAKES: That's all right.

19 BY MR. PINKARD:

20 Q It's Mr. Baskin.

21 Okay. What is his position with Big Cat Rescue
22 Corporation?

23 **A He is the chairman of the advisory board.**

24 Q And as chairman of the advisory board, what are
25 his duties and responsibilities?

1 **A** **He meets with leaders in the community, gets**
2 **them associated with our mission by giving them tours.**
3 **He serves on our board. He handles our financial**
4 **processes.**

5 **Q** **How much is he compensated for doing that?**

6 **A** **I don't know off the top of my head.**

7 **Q** **Is he paid a salary, or is he paid by the hour**
8 **or by the task? Do you know that?**

9 **A** **I think it's a salary.**

10 **Q** **All right. How long has he been receiving a**
11 **yearly salary?**

12 **A** **I don't know for sure.**

13 **Q** **How long has he held that position?**

14 **A** **He's held the position longer than he's been**
15 **paid for it, but I don't know for sure when that was**
16 **either.**

17 **Q** **Does he have another job besides that one?**

18 **A** **He does some investing.**

19 **Q** **Okay. I've got an exhibit here. It's a copy of**
20 **The Big Cat Times. I'd like to have this marked.**

21 **(Exhibit Number 1 marked for identification.)**

22 **BY MR. PINKARD:**

23 **Q** **All right. Let me show you what's been marked**
24 **as Exhibit Number 1 and ask if you recognize that.**

25 **A** **I do.**

1 Q What is it?

2 A **It's our newsletter.**

3 Q And is that the newsletter that you referred to
4 earlier in your testimony, I think a copy of the
5 newsletter?

6 MR. JAKES: She's referred to a few things.
7 You want to --

8 BY MR. PINKARD:

9 Q Well, okay. Skip the question. I guess it
10 doesn't matter.

11 But are you involved with the preparation of
12 the -- of that newsletter?

13 A **Yes.**

14 Q How often does the newsletter come out?

15 A **Quarterly.**

16 Q And has that been the case since the founding of
17 the corporation?

18 A **I don't know about the frequency earlier.**

19 Q All right. Would it be fair to say it's been
20 around at least 10 years, the newsletter?

21 A **Since the '90s we've had a newsletter.**

22 Q Okay. Has it been in that form or similar form
23 to Exhibit Number 1 since it was first sent out?

24 A **I believe it's changed formats two or three**
25 **times.**

1 Q Okay. Would there exist records at Big Cat
2 Rescue sanctuary concerning the various format changes of
3 the newsletter?

4 A Are you asking if we have copies of the old
5 newsletters or --

6 Q Yes.

7 A Yes.

8 Q All right. Will you take a look at the upper
9 left-hand corner of the newsletter? You see the
10 Big Cat Rescue with the tiger. Is that the trademark of
11 Big Cat Rescue Corporation?

12 A Yes.

13 Q Does the snow-leopard-eye picture appear
14 anywhere in that publication?

15 A In this one?

16 Q Yes.

17 MR. JAKES: Take a moment to look if you
18 need to.

19 A Only on the magnets in the middle in the
20 gift-shop section. It's really tiny, but it looks like
21 the snow leopard eyes to me.

22 BY MR. PINKARD:

23 Q Can you just point to which one you're referring
24 to?

25 A Like I said, it's really small, but I think that

1 **and that may be. Yeah, I'm doing the same thing.**

2 MR. SCHREIBVOGEL: You need some glasses.

3 MR. PINKARD: I think those might -- are
4 those reading glasses?

5 MR. JAKES: Yeah, they'll work.

6 MR. PINKARD: I won't stretch them out. I
7 know my head's got to be bigger than yours,
8 but --

9 MR. JAKES: I wasn't going to say anything
10 about that, Eric.

11 MR. PINKARD: I might not even be looking
12 at the right one.

13 MR. SCHREIBVOGEL: It's a white tiger
14 laying in the grass.

15 BY MR. PINKARD:

16 Q All right. But in any event, you're referring
17 to photo luggage tags?

18 A **Oh, okay. I thought it was magnets, but --**

19 Q Okay.

20 A **-- something.**

21 Q 4.50 each?

22 All right. So would that be the only possible
23 portion of this newsletter that would have the snow
24 leopard eyes that are on the website?

25 A **Yes.**

1 Q And page 6 and 7 of this Big Cat Rescue
2 newsletter depicts various items that can be purchased at
3 the -- from the sanctuary?

4 A Yes.

5 Q All right. And you can buy a Big Cat Rescue
6 cup?

7 A If it's in there, you can buy it.

8 Q Okay. And it also refers you to page 10 of
9 bigcatrescue.biz. Is that a portion of your website
10 where you can also buy -- purchase items online?

11 A It's an online store.

12 Q Okay. Is that separate from the
13 bigcatrescue.org website?

14 A They're hosted separately. They have different
15 URLs.

16 Q What is the purpose of selling all this
17 merchandise on the newsletter and the website?

18 A To help support the cats.

19 Q Is part of the reason for selling the
20 merchandise to promote the name of Big Cat Rescue
21 Corporation?

22 A Yes.

23 Q And is that why these various items, many of
24 them have the Big Cat Rescue trademark on them?

25 A Yes.

1 Q At the sanctuary would there be records that
2 would record the online sales?

3 A Yes.

4 Q Are the items on the website the same that are
5 depicted in this newsletter, or are there more of them on
6 the website?

7 A There are more on the website.

8 Q Do any of them on the website depict the snow
9 leopard eyes that are on the main website,
10 bigcatrescue.org?

11 A I'm pretty sure that the banner for the Big Cat
12 Rescue store is the snow leopard eyes, and there may be
13 items in there with those eyes. I don't know.

14 Q So bigcatrescue.biz has got the
15 snow-leopard-eyes banner on it?

16 A I'm pretty sure.

17 Q Only the snow-leopard-eyes banner or the other
18 cat eyes?

19 A No, just the one. It's bigcatrescue.biz.

20 Q Is there another website where merchandise from
21 Big Cat Rescue can also be purchased?

22 A Yes.

23 Q What's the name of that website?

24 A There's several.

25 Q Okay. Can you remember the names of them?

1 **A Cafe Press, Zazzle, Z-a-z-z-l-e.**

2 Q Z-a-z-z --

3 **A -- l-e.**

4 Q -- l-e? All right.

5 **A EBay.**

6 Q Okay. Does any of the merchandise sold on any
7 of those websites have cat leopard eyes that are on the
8 website?

9 **A It's possible.**

10 MR. JAKES: Eric, we've been about it for
11 about an hour and a half, so when you get to a
12 decent stopping point --

13 MR. PINKARD: I'm at a decent stopping
14 point.

15 MR. JAKES: Super.

16 (Recess taken from 10:30 a.m. to 10:43 a.m.)

17 (Exhibit Number 2 marked for identification.)

18 BY MR. PINKARD:

19 Q All right. Getting back to Exhibit Number 1, on
20 page 2 is a section that says "Saving Big Cats By
21 Changing Laws and Minds." Is that something that you
22 contribute to the newsletter?

23 **A Can I see it? Right here?**

24 Q Yeah.

25 MR. JAKES: For the record we're on page 2

1 lower left quadrant.

2 MR. PINKARD: Yes.

3 **A Yes.**

4 BY MR. PINKARD:

5 Q Is that something that appears in all of the
6 newsletters, that section?

7 **A There's not a section devoted to that, if that's
8 what you're asking.**

9 Q Well, the caption there, "Saving Big Cats By
10 Changing Laws and Minds," does that caption appear in all
11 of the newsletters?

12 **A No.**

13 Q Okay. And above that there's some information
14 about Representative Castor and cosponsors and whatnot.
15 Does that type of thing appear in the newsletters when
16 they come out?

17 MR. JAKES: That type of thing?

18 MR. PINKARD: Yeah, about referring to
19 legislators.

20 **A When it happens.**

21 BY MR. PINKARD:

22 Q Okay. Is this page 2 of the newsletter devoted
23 typically to laws and legislation concerning big cats?

24 **A Not necessarily.**

25 Q All right. On page 10 of the newsletters, it's

1 got some various activities that visitors can engage in.

2 Do you see that?

3 **A Yes.**

4 Q And these are the various pricing for the
5 variety of tours that can be taken at the sanctuary?

6 **A Yes.**

7 Q Okay. And since it's opened, has the sanctuary
8 provided these type of tours?

9 **A Not from the very beginning.**

10 Q Okay. How long did it take until you were able
11 to do these type of tours?

12 **A It would be different for each of those types of
13 tours.**

14 Q Okay. How long have you been able to do all of
15 the different tours that are listed there on page 10?

16 **A I'd say a few years, but I don't know exactly
17 how long.**

18 Q Okay. Why do you do these tours?

19 **A These are how we educate people about the plight
20 of the cats and how we raise funds to take care of the
21 cats.**

22 Q Earlier you mentioned the various websites where
23 merchandise from Big Cat Rescue can be purchased. Do
24 you -- do any of those sell any pictures of any cubs of
25 cats?

1 **A It's possible.**

2 Q Would there exist at the sanctuary records of
3 the revenues generated from the tours that you testified
4 about from the Big Cat Times?

5 **A Are you asking me if we have a way of tracking**
6 **money earned on the -- from the tours?**

7 Q Yes.

8 **A Yes.**

9 Q Better question than the one I asked. Thank
10 you.

11 All right. I'm showing you what's been marked
12 as Exhibit Number 2. I've got a copy for you. I'm
13 sorry.

14 MR. JAKES: Thank you. I appreciate it.

15 BY MR. PINKARD:

16 Q Exhibit Number 2 I copied from the
17 Big Cat Rescue website, the differing cat eyes that are
18 depicted therein.

19 Does that look to you to be accurate about which
20 ones appear on the website -- I mean the website of
21 Big Cat Rescue Corporation?

22 **A These are on our website.**

23 Q Are those all of the cat eyes that are on the
24 website?

25 **A No.**

1 Q How many other ones are there?

2 A I'd say 10 to 12.

3 Q 10 to 12 total or 10 to 12 in addition to the
4 ones we see here?

5 A Total.

6 Q And would that mean we could go to the website
7 and if you clicked on enough buttons you'd be able to see
8 all 12?

9 A It might take you a while.

10 Q What I mean by that, they don't rotate from day
11 to day where there might be 6 one day or 12 the next; all
12 of the cat eyes are always on the website?

13 MR. JAKES: Object to the form.

14 MR. PINKARD: That's confusing.

15 MR. JAKES: I object to the form.

16 BY MR. PINKARD:

17 Q I'm sorry. I'll withdraw the question.

18 Well, if there's 10 different varieties of all
19 cat eyes, are all 10 always present at some place on the
20 website?

21 MR. JAKES: Object to the form again. If
22 you can answer that --

23 A I'm not even sure how to answer that.

24 BY MR. PINKARD:

25 Q Well, I mean, if you clicked around the website,

1 would you be able to find all 10?

2 **A Eventually, yes.**

3 Q Okay. All right. Looking at the various eyes
4 depicted on Exhibit Number 1 there -- Exhibit Number 2 --
5 there are only two exhibits and I'm already messing it
6 up. The first one there, tiger eyes?

7 **A Correct.**

8 Q What's the second one?

9 **A Clouded leopard.**

10 Q I'm sorry?

11 **A Clouded leopard.**

12 Q Next one a spotted leopard?

13 **A Snow leopard.**

14 Q Snow leopard. I'm sorry. Snow leopard.

15 Next one a bobcat?

16 **A Caracul, c-a-r-a-c-a-l (sic).**

17 Q And what's the next one?

18 **A You had it right before.**

19 Q Bobcat.

20 Are all of these cats still at the sanctuary?

21 **A No.**

22 Q Can you recognize any of these cats by name?

23 **A The second one, the clouded leopard. His name**
24 **was Malachi, M-a-l-a-c-h-i. And, yes, I know that's**
25 **Malachi. It's just everybody called him Malachi.**

1 Q Is that the only one you can recognize?

2 A **It's the only one for sure.**

3 Q Malachi still around?

4 A **No.**

5 Q Do you have any recollection whether these cats
6 depicted in Exhibit 2 were rescued or brought to the
7 sanctuary by some other means?

8 A **I don't know who they are, so I don't know how
9 they got here.**

10 Q How many cats do you have out there presently?

11 A **109.**

12 Q And do you have an office at the sanctuary?

13 A **Sort of.**

14 Q Okay. In a typical 40-hour week, how many hours
15 are you spending at the sanctuary?

16 A **I'd say 15 to 20.**

17 Q Do you have a set schedule as to when you are
18 there?

19 A **No.**

20 Q Are you there more or less or about the same as
21 Mr. Baskin?

22 A **Probably more.**

23 Q Is there such a thing as a typical day at the
24 sanctuary?

25 A **No.**

1 Q Okay. Well, what do you usually do while you're
2 there?

3 A Therein is the problem. There is not a typical
4 day, so there's not something I usually do.

5 Q Okay. Well, what sort of involvement do you
6 have with the care of the animals?

7 A I oversee the procedures. I monitor the
8 procedures. I help with the medical care.

9 Q When you say oversees -- "oversee procedures,"
10 what procedures are you referring to?

11 A We create training programs for all of our staff
12 and volunteers. We create protocols for how things are
13 to be handled from the gift shop to animal emergencies.
14 So I'm involved in the creation of those and the
15 implementation of those.

16 Q Do you have any licenses?

17 A I have a Florida Wildlife Rehab Permit, a U.S.
18 Fish and Wildlife Migratory Bird Permit, which it may
19 actually be in the name of the sanctuary.

20 Q I think I missed a little part of the first one
21 that you said. Big Cat -- what was it?

22 MR. JAKES: Okay. Go.

23 BY MR. PINKARD:

24 Q If you remember. She'll probably remember.
25 What was the first thing you said?

1 **A The first one is a Wildlife Rehab Permit.**

2 **Q Wildlife. Okay. What agency gives that permit?**

3 **A The Florida Wildlife Commission.**

4 **Q How do you get one of those permits?**

5 **A It's changed from when I got it, so what are you**
6 **asking? Now or then?**

7 **Q Well, let's start with now. How do you get one**
8 **now?**

9 **A Now, you have to take a test, and I believe you**
10 **have to demonstrate a certain number of hours of doing**
11 **that kind of work.**

12 **Q And have you had to take that test?**

13 **A Yes.**

14 **Q Okay. When did you take that test?**

15 **A I don't remember what year.**

16 **Q All right. And before, you didn't have to take**
17 **a test, or what was the procedure before?**

18 **A The thing that's different now is I think they**
19 **require caging and fencing and that sort of thing,**
20 **whereas they didn't in the past.**

21 **Q What does that certificate allow you to do?**

22 **A To pick up native wildlife, care for them, and**
23 **release them, if possible.**

24 **Q And that is applicable to which animals at the**
25 **sanctuary?**

1 MR. JAKES: Object to the form. If you
2 understand the question.

3 **A Are you asking if I currently have rehab**
4 **animals?**

5 BY MR. PINKARD:

6 Q No, I'm saying, which animals at the sanctuary
7 are candidates for rehabilitation and placement back into
8 the wild?

9 MR. JAKES: Currently?

10 MR. PINKARD: Huh?

11 MR. JAKES: Currently or --

12 MR. PINKARD: Currently, yeah.

13 **A Currently, none.**

14 BY MR. PINKARD:

15 Q And what was the second permit that you said you
16 had?

17 **A That one's probably not in my name personally.**
18 **It's a U.S. Fish and Wildlife Service Migratory Bird**
19 **Permit.**

20 Q Does the sanctuary itself have any licenses?

21 **A Yes.**

22 Q What licenses does it have?

23 THE WITNESS: Do I answer that as the
24 representative?

25 MR. JAKES: If you know personally, you can

1 answer that.

2 **A Okay. We hold a USDA license and a Florida**
3 **Wildlife Commission license, and that migratory bird**
4 **license is probably --**

5 BY MR. PINKARD:

6 Q The USDA license is for a particular purpose?
7 It's a USDA license to do what, is what I'm trying to
8 figure out.

9 **A The commercial exhibition of wildlife.**

10 Q What was it that made you get involved in these
11 big cats to begin with?

12 **A My late husband and I had ended up at an**
13 **auction, and they were selling a bobcat. The people**
14 **bidding on her were taxidermists, and we bought her and**
15 **brought her home to keep her from being a den decoration.**

16 Q And was "home" at that time the Easy Way?

17 **A No.**

18 Q Where was the bobcat auction being held?

19 **A Ohio.**

20 Q And did you bring the bobcat back to Florida, or
21 did the bobcat then live in Ohio?

22 **A She came to Florida.**

23 Q Okay. What happened next on your road to
24 further involvement in the -- in the big cats?

25 **A The following year we ended up at a fur farm**

1 **where they were going to kill 56 bobcats and lynxes. We**
2 **purchased them and brought them back to Florida.**

3 Q You purchased 56 bobcats?

4 **A (Witness nods head.)**

5 MR. JAKES: Yes?

6 THE WITNESS: Yes.

7 BY MR. PINKARD:

8 Q Before you purchased the 56 bobcats, had you
9 already made efforts to have a place where they were
10 going to be living?

11 **A No.**

12 Q Where did these 56 bobcats reside?

13 MR. SCHREIBVOGEL: This is what were bought
14 and this is what she sold.

15 **A They were in my home and on the porches until we**
16 **could build cages out at the Easy Street property.**

17 BY MR. PINKARD:

18 Q How big is a bobcat? I'm thinking -- maybe I'm
19 thinking of a cougar. A bobcat is smaller, slightly
20 bigger than a regular size cat?

21 **A In Florida they're about 15 pounds to 20 pounds.**

22 Q Okay.

23 **A They can grow to 40 pounds.**

24 Q So these things were running around your
25 property and then your house until the cages were

1 constructed?

2 **A Yes.**

3 Q All right. Okay. What happened -- what
4 happened next on your big-cat involvement?

5 **A I'm not sure of the exact chronology.**

6 Q Okay. Well, at some point in time, you got
7 other animals besides bobcats.

8 **A Yes.**

9 Q When you were building the cages, was it your
10 idea that you were going to be building a sanctuary for
11 cats or just taking care of these particular bobcats?

12 **A My main concern was to keep them from being
13 killed for their pelts. I didn't know what I was going
14 to do or how I was going to deal with it.**

15 Q When did you decide to open or -- the sanctuary?

16 **A You say "open"?**

17 Q I know you founded it. You founded the
18 sanctuary. What led you to do that?

19 **A These cats that were in peril led me to bring
20 them in and to try and save them.**

21 Q Okay. At what point did you decide to expand
22 beyond just the bobcats you had to bring other cats into
23 the sanctuary?

24 **A The decisions on other cats were because of the
25 situations they were in. It wasn't -- it didn't have to**

1 do with what species they were, so I'm not really
2 understanding what you're getting at.

3 Q Well, I guess what I'm asking is, when you first
4 got all of these bobcats, did you think you were just
5 going to have these bobcats, or you were going to find
6 other cats that needed homes?

7 A I wasn't going out looking for other cats
8 initially.

9 Q Okay. And at some point you did start looking
10 for other cats or other cats looked for you?

11 A Unfortunately if you build it, they will come.

12 Q So were there bobcats there when you first
13 founded the sanctuary?

14 A When we first --

15 Q Well, when you founded the sanctuary, Big Cat
16 Rescue, even though it was under a different name.

17 A When we incorporated that name --

18 Q When you incorporated.

19 A -- is that what you're asking me?

20 Q No. When you first had the sanctuary and you
21 incorporated a name, not Big Cat Rescue Corporation but
22 the predecessor name, which -- did you have only the
23 bobcats?

24 A No.

25 Q All right. How many cats did you have when you

1 founded the sanctuary?

2 **A I don't know.**

3 Q More than just the bobcats, though?

4 **A Yes.**

5 Q Do you have a recollection of where you acquired
6 the other cats that were present besides the bobcats when
7 you founded the sanctuary?

8 **A I don't know all of the cats who were there at
9 that time, so I can't tell you how all of the cats got
10 there.**

11 Q All right. Were some of the cats purchased?

12 **A Yes.**

13 Q Can you say how many of those cats that weren't
14 the bobcats were what would be considered rescues?

15 **A If somebody's going to kill a cat for their fur
16 and you pay for that cat, is that a rescue?**

17 MR. JAKES: You don't get to ask the
18 question. If there's a question about how he --
19 you're confused about his wording, we can
20 inquire into that. Is it a question about what
21 a rescue is?

22 THE WITNESS: Well, yes.

23 MR. JAKES: Okay.

24 BY MR. PINKARD:

25 Q How do you define a rescue?

1 **A** The way I would define it now is different from
2 the way I defined it then. But then, I believed that you
3 could purchase a cat out of a bad situation and it would
4 be considered a rescue.

5 What I've discovered is that people will
6 continue to abuse animals if you fund their ability to do
7 that, and so we have not purchased animals since the
8 '90s.

9 **Q** All of the animals that were purchased would
10 have been in bad situations?

11 **A** I don't know.

12 **Q** Would purchasing a cat that's not in a bad
13 situation be within any of your definitions of rescuing a
14 cat?

15 **A** Certainly not now.

16 **Q** Would that -- would that have been within your
17 definition at some point in time?

18 **A** Purchasing a cat out of a not-bad situation --

19 **Q** Yes.

20 **A** -- would that have been considered a rescue?

21 **Q** Yes.

22 **A** I don't think so.

23 **Q** Did you ever purchase any cats that weren't in a
24 bad situation?

25 MR. JAKES: Objection; asked and answered.

1 **A** **I personally was not involved in purchasing any**
2 **cats.**

3 BY MR. PINKARD:

4 **Q** That would have been your late husband?

5 **A** **Yes.**

6 **Q** Did your late husband have the license to sign
7 the transfer of the cats into the sanctuary?

8 **A** **He had the license, yes.**

9 **Q** All right. Of the 109 cats you currently have,
10 do you have any recollection of how many of those fit
11 your current definition of rescued?

12 **A** **I don't know.**

13 **Q** Would some of them not fit your current
14 definition of "rescued"?

15 **A** **Yes.**

16 **Q** Were any of the 109 cats that are currently at
17 the sanctuary born at the sanctuary?

18 **A** **Yes.**

19 **Q** Do you know approximately how many?

20 **A** **Probably about 30.**

21 **Q** And are those cats part of your exhibition when
22 the public comes to the sanctuary?

23 **A** **Yes.**

24 **Q** Is there an attempt made by the sanctuary to
25 distinguish to the guests of the sanctuary that come

1 there for the tours which cats were rescued and which
2 cats were born at the facility?

3 **A We clearly state on a sign in the backyard our**
4 **evolution, the way we used to believe about these**
5 **animals, and the fact that we no longer breed or buy**
6 **animals. Our tour guides are trained on their tours to**
7 **talk about how some of the animals had been born there in**
8 **the early years and how we have changed our philosophy as**
9 **we've learned that none of these animals can ever go back**
10 **to the wild, none of them can be used in conservation**
11 **breeding, and therefore we do not condone the breeding of**
12 **animals -- of big cats, anyway -- for life in captivity.**

13 **Q Who is it that currently conducts the tours at**
14 **the sanctuary?**

15 **A Both volunteers and staff give tours.**

16 **Q Do you give the tours yourself sometimes?**

17 **A Sometimes.**

18 **Q Do you know -- recall the names of any of the**
19 **individuals other than yourself that give tours at the**
20 **sanctuary?**

21 **A Oh, there's plenty of people that I know give**
22 **tours at the sanctuary.**

23 **Q Okay. To the best of your recollection, can you**
24 **give me a few names?**

25 **A My husband, Howard Baskin; Dennis Mitchell;**

1 **Pamela Rodriguez; Kim Dever; a lot of our interns;**
2 **Sharyn Beach, Edith Parker; Jeff Kremer.**

3 Q Mr. Kremer was involved in the organization when
4 it was founded?

5 A No.

6 Q When the name Big Cat Rescue Corporation was
7 incorporated, was Mr. Kremer involved at that time in
8 2003?

9 A I don't know.

10 Q Has he ever been an officer of Big Cat Rescue
11 Corporation?

12 A No.

13 Q Other than Mr. Baskin, are there other
14 individuals that are paid by the sanctuary?

15 A Yes.

16 Q All right. Who are they?

17 A **Jamie Murdock, Vernon Stairs, Chelsea Feeny,**
18 **Jennifer Flatt, Gale Ingham, I-n-g-h-a-m. I know I'm**
19 **missing some. It's all on our website.**

20 Q Are these folks typically paid a salary or
21 hourly wage?

22 A **Salary, I think.**

23 Q Is there something in writing at the sanctuary
24 as to what is supposed to be said when these tours take
25 place?

1 **A Yes.**

2 Q All right. I got numero 3 here. This is just a
3 copy of the complaint. I got another one if you want it.
4 (Exhibit Number 3 marked for identification.)

5 THE WITNESS: Do I keep this?

6 MR. JAKES: She's going to eventually keep
7 it, so...

8 BY MR. PINKARD:

9 Q Okay. Exhibit Number 3 there is the complaint
10 in this action. Have you ever read that complaint
11 before?

12 **A If it is this complaint, yes, I've read it.**

13 Q If you look at page 4, down in paragraph 12, it
14 says, "BCR is the owner of the federally registered
15 mark," and it's got "Big Cat Rescue" with the tiger.

16 Do you see that?

17 **A Yes.**

18 Q To your knowledge has Mr. Schreibvogel ever used
19 the tiger emblem that's depicted in that mark?

20 **A I don't know.**

21 Q Well, I'm asking you, to your knowledge has he
22 ever used it?

23 **A Not the tiger portion that I remember.**

24 Q All right. Have you reviewed the materials that
25 Mr. Schreibvogel has used as to traveling shows?

1 **A "The materials" being?**

2 Q Marketing materials.

3 **A Yes.**

4 Q And this registration number, according to the
5 bottom of page 4, disclaims the exclusive rights to the
6 words "Big Cat Rescue." Is that correct?

7 **A That's what it says.**

8 Q Was there a particular reason why you disclaimed
9 the exclusive rights to those words?

10 MR. JAKES: I'm going to object to the
11 extent she's not the designated witness on this
12 topic; but if she has personal knowledge, she
13 can answer.

14 **A And I don't.**

15 BY MR. PINKARD:

16 Q To your knowledge does -- are there other
17 businesses that use the name "Big Cat Rescue"?

18 **A Not just "Big Cat Rescue."**

19 Q And if another entity used the name of Big Cat
20 Rescue, would that be an infringement of this mark given
21 that you've disclaimed the exclusive rights to those
22 words?

23 MR. JAKES: I'm going to object to the form
24 of the question; improper hypothetical; calls
25 for a legal conclusion. You can answer.

1 **A Again, I wouldn't know.**

2 BY MR. PINKARD:

3 Q How about the words "Big Cat"? Are there other
4 entities and organizations that you're aware of that use
5 those two words as a business?

6 **A Not just those two words.**

7 Q Those two words in addition to some other words?

8 **A Yes.**

9 Q All right. To your knowledge, has Big Cat
10 Rescue Corporation taken any action to enforce the
11 registered trademark for -- against any other entities
12 that have used just the name "Big Cat Rescue"?

13 **A Yes.**

14 Q Who is that? Who? Tell me about that. Which
15 entity was that?

16 **A There was a man in Australia who used our name
17 under the auspices of helping us; and I contacted him and
18 told him to stop it, and he did.**

19 Q Do you remember the guy's name in Australia?

20 **A Not off the top of my head.**

21 Q Did you have some sort of communication with him
22 about that?

23 **A Obviously.**

24 Q I'm sorry. I meant to say, did you have a
25 written communication with him?

1 **A I don't remember how I communicated with him.**

2 Q How long ago did this happen?

3 **A A couple of years ago; three years ago, maybe.**

4 Q Did he have a big-cat operation, so to speak,
5 out in Australia?

6 **A I don't know what he was doing.**

7 Q Okay. Have you ever made any -- strike that.

8 Have you ever taken any actions within the
9 United States against any entity using just the name
10 "Big Cat Rescue"?

11 MR. JAKES: Apart from the instant lawsuit?

12 MR. PINKARD: Apart from that.

13 BY MR. PINKARD:

14 Q I'm sorry, apart from the instant lawsuit.

15 **A I don't know of any entity that has used just
16 the name "Big Cat Rescue."**

17 Q Okay. Looking at page 6 of the complaint, down
18 near the bottom of the page it's got a caption there with
19 "Big Cat Rescue Entertainment."

20 Do you see that portion of the complaint?

21 MR. JAKES: I'm not sure I see a caption on
22 page 6.

23 MR. PINKARD: A picture. I'm sorry.

24 MR. JAKES: Okay.

25 BY MR. PINKARD:

1 Q A picture. I'm sorry.

2 A Yes.

3 Q And paragraph (b) there says that "The
4 defendants used a photo of a snow leopard's eyes
5 virtually identical to the photograph of the snow leopard
6 that is used as a focal point of BCR Corporation's
7 website."

8 Do you read that?

9 A Yes.

10 Q Is that allegation true?

11 A **Is the allegation that he used that photo true?**

12 Q Used the snow leopard as the focal point of
13 BCR's website.

14 A Yes.

15 Q So you believe, as you testify here today, that
16 the snow leopard is used as the focal point of
17 BCR Corporation's website?

18 A **I think this combination was purposely contrived
19 to try and confuse the public.**

20 Q Okay. I'm asking you a question if the snow
21 leopard eyes currently as it's depicted on the website is
22 used as the focal point of BCR Corporation's website?

23 MR. JAKES: Okay. I'm going to object to
24 the form. It's a separate question that's
25 not -- does not bear on the allegations on page

1 6 and 7.

2 **A And I'm not understanding the difference between**
3 **what you're asking me about this and what you're asking**
4 **me about what's currently on our website.**

5 BY MR. PINKARD:

6 Q Is the snow leopard used on the website used as
7 the focal point of BCR Corporation's website currently?

8 MR. JAKES: Objection; asked and answered.

9 Go ahead and answer again if you can.

10 **A Not currently. It's in part because we still**
11 **use the snow leopard eyes.**

12 BY MR. PINKARD:

13 Q The current use of rotating cat eyes on the
14 website, is that related in any way to any activity on
15 the part of Mr. Schreibvogel?

16 **A I'm not understanding what you're asking me.**

17 Q Has anything Mr. Schreibvogel done caused you to
18 change your website and add more cat eyes in addition to
19 the snow leopard?

20 MR. JAKES: Keep that thought.

21 Object to the extent that "you" is vague
22 and ambiguous, because she's not here as the
23 corporate representative of Big Cat Rescue. Go
24 ahead and answer if you can.

25 **A I don't think so.**

1 BY MR. PINKARD:

2 Q Okay. To your knowledge has Big Cat Rescue
3 Corporation sustained any actual economic damages from
4 Mr. Schreibvogel's use of the picture that's depicted on
5 page 6?

6 A I don't know.

7 Q Have you made any effort to determine whether or
8 not Big Cat Rescue Corporation has sustained any damages
9 for Mr. Schreibvogel's use of that picture on page 6?

10 A I don't handle our finances.

11 Q Don't handle what?

12 A Our finances.

13 Q Have you had any discussions with anybody at
14 Big Cat Rescue Corporation as to whether or not there
15 were any damages related to Mr. Schreibvogel's use of
16 this picture at page 6?

17 MR. JAKES: Let me just caution you. To
18 the extent that any of those communications were
19 in the presence of your counsel or counsel for
20 Big Cat Rescue, I'm going to instruct you not to
21 answer. If you had any communications where
22 there was no lawyer present, you can answer.

23 A Not that I recall.

24 BY MR. PINKARD:

25 Q Has the overall revenues generated by Big Cat

1 Rescue Corporation gone down in any way since
2 Mr. Schreibvogel used this picture on page 6?

3 **A I believe so.**

4 Q Okay. When did that start? When did the
5 revenues start going down?

6 **A I believe last year, 2011, was not as good as**
7 **2010; but like I said, I don't handle the finances, so**
8 **I'm not entirely sure.**

9 Q How much revenue did Big Cat Rescue Corporation
10 generate in the year 2011?

11 **A I don't know yet for 2011.**

12 Q What about for 2010?

13 **A I think it was 1.5 or 1.7 million.**

14 Q Is the picture on page 6 of the complaint a
15 picture of the same snow leopard that is on your website?

16 MR. JAKES: Let me object to the form. Go
17 ahead.

18 **A I don't know.**

19 BY MR. PINKARD:

20 Q Do you know where Mr. Schreibvogel got that
21 photograph?

22 **A I don't know.**

23 Q Given the fact that the snow leopard photograph
24 is no longer the focal point of the website, will Big Cat
25 Rescue Corporation be sustaining any damages in the

1 future from Mr. Schreibvogel's use of the photograph
2 depicted on page 6?

3 **A I'm not a psychic.**

4 Q Is Mr. Schreibvogel in competition with Big Cat
5 Rescue Corporation?

6 **A How would you define "competition"?**

7 Q It's in your lawsuit. How would you define
8 "competition"?

9 MR. JAKES: Object to the form. This is
10 not her lawsuit.

11 MR. PINKARD: It's Big Cat Rescue's
12 lawsuit.

13 BY MR. PINKARD:

14 Q The lawsuit alleges that he's in competition
15 with Big Cat Rescue Corporation. Do you agree with that?

16 **A I think by using this contrived use of our logo
17 and our image, he is competing with us for funds that
18 really belong to us.**

19 Q Well, does Big Cat Rescue Corporation ever go on
20 the road and put on traveling shows?

21 **A No.**

22 MR. PINKARD: We're getting pretty close to
23 the lunch hour. I think it might be a good idea
24 to take a break. Is that okay with you guys?

25 MR. JAKES: We are flexible.

1 (Recess taken from 11:49 a.m. to 1:10 p.m.)

2 BY MR. PINKARD:

3 Q When did you first hear of Mr. Joe Schreibvogel?

4 MR. JAKES: Of him?

5 MR. PINKARD: Of him. Did I say "from"?

6 MR. JAKES: I thought you just said "When
7 did you first hear Mr. Joe Schreibvogel?"

8 MR. PINKARD: No. Okay.

9 MR. JAKES: That was my hearing.

10 A I don't recall what year.

11 BY MR. PINKARD:

12 Q Do you recall the circumstances?

13 A I know that I had seen several reports of
14 different entities that were doing these cub-petting
15 displays. I didn't realize that so many of them were him
16 until later on.

17 Q Okay. Were you specifically researching whether
18 or not there was any cub-petting going on, or how did you
19 come across these entities that Joe was involved with?

20 A I set up Google alerts to alert me anytime there
21 is a mention of lions, tigers, leopards; any kind of
22 exotic cat.

23 Q Just cats, period, or cubs, really?

24 A I don't know if there's one set for cubs.

25 Q Okay. And when that occurred and you got the

1 alerts about the cub-petting, what, if anything, did you
2 do?

3 **A I would research it to find out what was going**
4 **on; who was involved, if I knew.**

5 Q And if you found out -- once you found out who
6 was involved, did you take any action --

7 **A Yes.**

8 Q -- or your organization, Big Cat Rescue
9 Corporation?

10 **A Yes.**

11 Q What sort of action?

12 **A Typically I would contact the venue and ask them**
13 **to not hold any kind of abusive displays and educate them**
14 **as to why so many people believe this to be abuse.**

15 Q Do you have any recollection when you started
16 doing that, contacting the venues?

17 (Mr. Baskin left the room.)

18 **A I don't know what year.**

19 BY MR. PINKARD:

20 Q And you said that you would contact them about
21 abusive displays. What information would you give to
22 them about the displays?

23 **A I would talk to them about how breeding cats for**
24 **life in captivity, taking their cubs away from them,**
25 **trekking them around to malls and fairs and flea markets**

1 and parking lots was inherently cruel to the animal.

2 (Mr. Baskin entered the room.)

3 BY MR. PINKARD:

4 Q Did you say anything else in particular about
5 Mr. Schreibvogel other than what you've described?

6 A If I knew that it was him, I would tell them
7 what I knew about him.

8 Q And what would you say?

9 A Primarily the things that we have posted online.

10 Q Do you recall what those things are?

11 A We would discuss his USDA violations, the --

12 Q Okay.

13 A -- frequency of these cubs being used in this
14 manner.

15 Q Anything else?

16 A Mostly about the issue itself. It doesn't
17 matter who the perpetrator is. It's just wrong to treat
18 animals this way, and letting them know that most people
19 agree that it's wrong to treat animals this way.

20 Q Have you ever told any of the venues that
21 Mr. Schreibvogel's only in it for the money and not to
22 try to help the cats?

23 A I don't think those are my exact words.

24 Q Something similar to that?

25 A I believe similarly.

1 Q All right. Do you believe as you sit here today
2 that Joe's shows were only about money and not to help
3 cats?

4 A I do not believe he was helping cats.

5 Q All right. And what information do you have
6 that would lead you to that conclusion?

7 A The entire premise of taking big cats out in
8 public and using them as photo props goes against the
9 message of them not being suitable pets. You can't tell
10 somebody you can have your picture made with a cub and
11 say, "This doesn't make a good pet" and be effective in
12 your mission.

13 Q If he was using the revenues from the shows to
14 provide care to the animals back in his park, would that
15 be helping the cats?

16 MR. JAKES: Object to the form. Go ahead.

17 A He has to continue breeding cubs to make money.
18 That adds to the problem. That doesn't fix the problem.

19 BY MR. PINKARD:

20 Q But back to my question. If he puts these shows
21 on and any revenues from those shows are used to take
22 care for the animals back at his park, if that's his
23 motive, is he doing it to help the cats or to make money?

24 MR. JAKES: Same objection.

25 A It can't work. It doesn't work. You can't keep

1 adding huge carnivores to your food bill every year and
2 say that taking them out in public and breeding more of
3 them is fixing the problem or helping you take care of
4 them. So it's not taking care of the animals. It's
5 adding to the problem.

6 BY MR. PINKARD:

7 Q Do you think that the money he was deriving from
8 these shows was used to care for the animals at his park?

9 A I don't know how he spends his finances.

10 Q Do you know whether any of the cubs that were
11 used for his traveling show ever ended up in the
12 medicinal-animal-parts trade?

13 A There's no way to know where they end up.

14 Q Have you represented to these venues that Joe
15 was going to be putting the shows on at that some of the
16 cubs might end up in the medicinal-animal trade?

17 A I contend that it's possible.

18 Q All right. Do you have any evidence that it
19 actually has ever happened?

20 A That his cubs or cubs in general?

21 Q His cubs.

22 A I don't know.

23 Q Has there been any communications to any of the
24 malls from Big Cat Rescue Corporation that said that the
25 cubs that were being petted at these displays would end

1 up in the -- being killed and their parts being sold in
2 the medicinal-animal trade?

3 MR. JAKES: I would object to the extent
4 that she's not designated as a corporate witness
5 on this topic.

6 If you have knowledge sufficient to answer
7 the question personally, you can answer the
8 question.

9 **A I haven't written that.**

10 BY MR. PINKARD:

11 Q All right. Is that a true statement that the
12 cubs that were used in Joe's traveling show will end up
13 in the medicinal-animal trade?

14 **A I don't know what could happen.**

15 Q All right. Who is Susan Bass?

16 **A She is a person who handles PR for us and helps
17 me with the legislative alerts.**

18 Q Is part of her duties at Big Cat Rescue
19 Corporation to monitor where Mr. Schreibvogel's traveling
20 show is going to?

21 **A She's not looking specifically for him. She's
22 looking for any -- anybody who's doing those kinds of
23 things with cubs or tigers, adult tigers like circus
24 acts.**

25 Q Do you regularly attend the board meetings of

1 Big Cat Rescue Corporation?

2 **A Yes.**

3 Q Has it ever been discussed at those -- at any
4 board meeting that you were present that Miss Bass was
5 hired primarily to track where Mr. Schreibvogel was going
6 with his traveling show and to correspond with the
7 various venues?

8 **A I don't think that's her primary service.**

9 Q All right. Is it your opinion that all
10 facilities that breed big cats are animal abusers?

11 **A I don't believe that big cats belong in cages.**
12 **I think it's inherently cruel.**

13 Q So what is the answer to my question? Are all
14 facilities that breed cats engaging in animal abuse?

15 **A I think it's abusive.**

16 Q Is Busch Gardens abusing animals if it breeds
17 any cats at its location?

18 MR. JAKES: Object to the form of the
19 question.

20 **A I think it would be abusive to breed cats for**
21 **life in cages. It doesn't matter who you are.**

22 BY MR. PINKARD:

23 Q In addition to contacting the various venues
24 that Joe was -- Joe Schreibvogel was going to be
25 appearing at, did -- does Big Cat Rescue Corporation also

1 encourage other people to complain about these
2 exhibitions?

3 **A Yes.**

4 Q How do you go about doing that?

5 **A We alert our supporters when we know of a**
6 **situation where a mall or a fair has either not responded**
7 **to us or responded negatively that they are not going to**
8 **discontinue those kinds of acts. We ask those people to**
9 **contact them and tell them how they feel about it.**

10 Q Do you provide assistance to them as to what
11 they're going to say to the mall?

12 **A We give them a sample letter.**

13 Q And how are these folks contacted to send them
14 the sample letter?

15 **A Sometimes we e-mail them. Sometimes we post it**
16 **on Facebook. Sometimes it's on our website.**

17 MR. SCHREIBVOGEL: I need to step out.

18 (Mr. Schreibvogel left the room.)

19 BY MR. PINKARD:

20 Q What is 911 Animal Abuse?

21 **A It's a website.**

22 Q Are you involved in that website as far as
23 ownership of it?

24 **A Yes.**

25 Q Does 911 Animal Abuse also post this -- the

1 information that you say that you have about
2 Mr. Schreibvogel?

3 **A Yes.**

4 Q And does the 911 Animal Abuse website also
5 encourage people to contact these venues?

6 **A On some pages it probably does.**

7 **(Mr. Schreibvogel entered the room.)**

8 BY MR. PINKARD:

9 Q Do you have any idea of the number of different
10 venues that Joe was going to appear at that you've
11 contacted?

12 **A I don't know the number.**

13 Q In addition to the written encouragement of the
14 e-mails and the other written communications, do you also
15 encourage people to go to the malls and demonstrate?

16 **A I think we have.**

17 Q Have you ever informed the venues that if they
18 don't stop using the -- or stop having the --
19 Mr. Schreibvogel's shows that you're going to have a lot
20 of people show up at the mall and protest it?

21 **A I haven't said that.**

22 Q Anybody else to your knowledge at Big Cat Rescue
23 Corporation done that?

24 **A I don't think so.**

25 Q All right. Have you ever been to

1 Mr. Schreibvogel's park?

2 **A No.**

3 Q Is there anything about the cubs that are in
4 these traveling shows that makes it more likely that they
5 would be killed and their parts sold in the
6 medicinal-animal trade than any other cat in captivity?

7 **A Yes. I don't think most cats in AZA accredited
8 zoos are going to end up in those situations.**

9 Q Well, is there anything about the fact that
10 they're cubs rather than full-grown that would make them
11 more susceptible or at risk at being in the
12 medicinal-animal trade?

13 **A All tigers start out as cubs.**

14 MR. JAKES: I think it's a problem with the
15 way the question was phrased probably.

16 BY MR. PINKARD:

17 Q Okay.

18 **A They --**

19 Q Is there anything about the fact that the
20 animals in Joe's traveling show are cubs that makes them
21 more at risk for being in the medicinal-animal trade than
22 any other cat?

23 **A It's not the virtue of the fact that they have
24 been cubs that makes them more susceptible.**

25 Q Okay. Or that they are cubs when they're in the

1 show?

2 **A Correct.**

3 Q When Susan Bass sends out these e-mails to the
4 venues, does she have to get approval from the -- from
5 you to -- as to their content?

6 **A She doesn't have to.**

7 Q Do you sometimes review them for their content?

8 **A Sometimes.**

9 Q And is she authorized to send the e-mails out
10 without your approval?

11 **A Yes.**

12 Q How about anything that is said about
13 Mr. Schreibvogel on your website? Is that something that
14 you would have to approve?

15 **A Yes.**

16 Q How about something on 911 Animal Abuse?

17 **A Yes. Well, no, because that has a component
18 where the public can create a -- I don't know what you
19 call it. They can create an account, and they can post
20 their own videos and photos and information.**

21 Q Are you an owner in 911 Animal Abuse, or is
22 Big Cat Rescue Corporation an owner in 911 Animal Abuse?

23 **A I don't know.**

24 Q How long ago was that website started?

25 **A I don't remember what year.**

1 Q Is you or the Big Cat Rescue Corporation the
2 sole owner of it?

3 MR. JAKES: Object to the -- object to the
4 form. Go ahead.

5 A As opposed to who else?

6 BY MR. PINKARD:

7 Q Someone else in addition to you owning it.

8 A No, there's no outside owners other than the
9 owners of their content that they post.

10 Q Does your -- or does Big Cat Rescue Corporation
11 directly contact zoos or parks or sanctuaries that breed
12 big cats to try to discourage them from doing so?

13 A Yes.

14 Q Have you ever sold or has Big Cat Rescue
15 Corporation ever sold any of the cats that are at the
16 sanctuary?

17 A Not the ones that are currently at the
18 sanctuary.

19 Q Well, they wouldn't be there if you'd sold them
20 before, but since --

21 A That's kind of how you asked the question,
22 though.

23 Q Okay. Since the place opened, have you sold --
24 has that entity sold any cats?

25 A Yes.

1 Q Okay. When did that occur and what kind of
2 cats, if you recall?

3 A All of the sales would have been prior to 1997.

4 Q Where were they -- what kind of places were they
5 sold to?

6 A They were private owners. Probably mostly
7 private owners.

8 Q So some of those cats that were sold from the
9 sanctuary could have ended up at the medicinal-animal
10 trade and killed and sold?

11 A The only cats used in the Asian medicinal trade
12 to my knowledge are tigers, and we've never bred or sold
13 tigers.

14 Q Do you know whether or not any of the animals
15 that were sold by Big Cat Rescue Corporation ended up in
16 deplorable living conditions?

17 A I doubt it, because in the beginning when we
18 were first placing animals, what we found was people
19 couldn't take care of them and ended up bringing them
20 back. So the vast majority of them ended up coming back
21 to us.

22 MR. JAKES: I'm going to also interpose an
23 objection for that question because it presumes
24 that Big Cat Rescue Corp. was in existence in
25 the '90s --

1 THE WITNESS: And it wasn't.

2 MR. JAKES: -- and it wasn't.

3 THE WITNESS: Which is was pre-'97.

4 BY MR. PINKARD:

5 Q Oh. The entity that preceded it.

6 Is one of the things you tell the venues of
7 Mr. Schreibvogel that the cubs that are involved in these
8 shows will likely end up in deplorable living conditions?

9 A I don't know that that's my words.

10 Q Something similar to that?

11 A I think it's very possible.

12 Q Have you said that -- have you communicated that
13 to the venues before?

14 A Not in those direct terms, I don't believe; but
15 something similar, yes.

16 Q And why do you believe that?

17 MR. JAKES: Believe what?

18 MR. PINKARD: That some of the cubs at the
19 shows will end up living in deplorable living
20 conditions.

21 MR. JAKES: Object to the form of the
22 question.

23 A Typically what I have seen is that these animals
24 end up being warehoused, crammed together in small barren
25 enclosures after they have outlived their profitable cub

1 **stage.**

2 BY MR. PINKARD:

3 Q All right. Do you have any specific knowledge
4 about any of the cubs that have been in
5 Mr. Schreibvogel's shows where that happened to them?

6 A **I've seen pictures of his facilities, and it's**
7 **just row after row after row of barren jail cells full of**
8 **cats. To me that's a deplorable way to keep a**
9 **magnificent animal like a tiger.**

10 Q Where did you see that condition at his park?

11 A **I've seen his pictures on his website.**

12 Q Anywhere else?

13 A **He has an Internet show that he does, Exotic**
14 **Animal TV. I've seen video that he's posted there.**

15 Q So it's your opinion that the animals at
16 Mr. Schreibvogel's park, the G.W. Exotic Animal
17 Foundation, are in deplorable conditions?

18 A **Yes.**

19 Q And that's because they're in what you described
20 as jail cells?

21 A **In addition to a number of other reasons, yes.**

22 Q Okay. What are the other reasons?

23 A **The continued overcrowded by continuing to breed**
24 **and add to the problem puts all of those cats in peril.**

25 **I know that he has -- excuse me. I know that**

1 Joe Schreibvogel has sent cats of his to facilities that
2 are under investigation or in current lawsuits with USDA
3 for the deplorable conditions that exist in their
4 conditions.

5 Q All right. Well, let's just stick with his
6 facility for the time being.

7 You've got -- you've got the jail cells and
8 you've got the overcrowding. What else?

9 A I have seen images of a lion who had her leg
10 ripped off by other cats in the cage because of the
11 overcrowding.

12 Q When did that happen?

13 A I believe it was around 2006.

14 Q Okay. What else about G.W. Exotic Memorial
15 Animal Foundation do you believe is deplorable
16 conditions?

17 A The CBS Morning Show did an exposé that was done
18 by HSUS showing that these cubs are routinely beaten,
19 that animals are dying for unknown reasons.

20 Q Okay. Anything else that contributes to your
21 opinion that G.W. Exotic Memorial Animal Foundation is
22 in -- has animals in deplorable conditions?

23 A I know that they were being transported in a van
24 that did not have proper air conditioning for them.

25 Q You talking about the tiger cubs?

1 **A Yes.**

2 Q Okay.

3 **A The cubs have frequently demonstrated patches of**
4 **fur missing that appear to be brain worm, which is a**
5 **condition that is caused from being kept in deplorable**
6 **conditions; and we know that at least 23 cubs have died**
7 **there just in an 18-month period.**

8 Q Okay. Anything else about the deplorable
9 conditions at the G.W.?

10 **A Not that comes to mind.**

11 Q Now, is this information that you tell to the
12 venues where Joe is going to attempt to put on his
13 traveling shows?

14 **A Yes.**

15 Q On your website are there various stories about
16 the different cats as to how they were rescued?

17 **A Yes.**

18 Q And is that also on the TV program on Big Cat
19 TV? You have a TV on YouTube. Right?

20 **A We have a YouTube channel, yes.**

21 Q YouTube, yeah.

22 Are there stories about the cats on the YouTube?

23 **A Yes.**

24 Q Are you the person that would approve the
25 stories that are on the website?

1 **A Yes.**

2 Q Are the stories that are on the website accurate
3 as to how the animals were rescued?

4 **A If it refers to how they were rescued, it is**
5 **accurate information.**

6 Q Would it be appropriate or ethical to have
7 inaccurate information about the -- how these cats were
8 rescued?

9 MR. JAKES: Object to the form.

10 **A To the best of my knowledge, we post everything**
11 **to the best of our ability, what we know to be accurate.**

12 BY MR. PINKARD:

13 Q Have any animals died at the sanctuary?

14 **A Yes.**

15 Q Can you approximate the number since you started
16 operations?

17 **A It would be a guess.**

18 MR. JAKES: You're talking about a 20-,
19 25-year period.

20 **A I would be guessing. We post them all online.**

21 MR. SCHREIBVOGEL: That's just last year.

22 BY MR. PINKARD:

23 Q Have you ever -- or do you know what message Joe
24 tells the people at his magic shows?

25 **A No.**

1 Q Do you know whether he tells them that private
2 ownership of these type of cats is not appropriate?

3 A **Your actions speak much louder than your words.**

4 MR. JAKES: Just answer the question.

5 A **I don't know what he says.**

6 BY MR. PINKARD:

7 Q All right. How about at his park? Do you know
8 what he tells people -- or what the foundation in
9 Oklahoma tells people that come on to the park to see the
10 animals?

11 A **No.**

12 Q Do you know whether any of the -- part of the
13 money that is generated, revenues generated at
14 G.W. Exotic Memorial Animal Foundation goes for the
15 preservation of cats in the wild?

16 A **I don't know.**

17 MR. PINKARD: Let me confer with my client
18 for a moment and I might be near the end here.

19 (Recess taken from 1:53 p.m. to 1:58 p.m.)

20 MR. PINKARD: I'm sorry to say we're done
21 with our conversation for the day. We can't
22 engage in any more fun. No more questions.

23 MR. JAKES: Okay. I just have a few hours.

24 We'll read and sign.

25 THE COURT REPORTER: Do you want this typed

1 up?

2 MR. PINKARD: Please.

3 THE COURT REPORTER: Frank, do you want a
4 copy?

5 MR. JAKES: I would love one, thank you
6 very much. And I can coordinate her review.
7 And if you'll send me the original errata sheet
8 and signature sheet, we'll take care of that.

9 (Deposition concluded at 1:58 p.m.)

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CERTIFICATE OF OATH

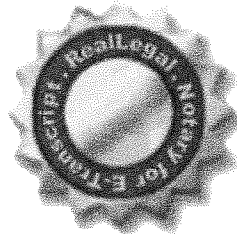
STATE OF FLORIDA)
COUNTY OF HILLSBOROUGH)

I, BEVERLY REPLOGLE, Notary Public, State of Florida, certify that CAROLE BASKIN personally appeared before me on June 4, 2012 and was duly sworn.

WITNESS my hand and official seal this date: June 4, 2012.

Beverly L. Replogle

BEVERLY REPLOGLE
Notary Public
State of Florida
Commission No. EE 150399
My Commission Expires: 2/25/16



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CERTIFICATE OF REPORTER

STATE OF FLORIDA)
COUNTY OF HILLSBOROUGH)

I, BEVERLY REPLOGLE, do hereby certify that I was authorized to and did stenographically report the foregoing deposition of CAROLE BASKIN; that a review of the transcript was requested; and that the transcript, pages 1 through 87, is a true record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

Dated June 7, 2012.


BEVERLY REPLOGLE

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June 7, 2012

Frank R. Jakes, Esquire
Johnson, Pope, Bokor, Ruppel & Burns, LLP
403 East Madison Street, 4th Floor
Tampa, Florida 33602

IN RE: Big Cat Rescue Corp. vs. Big Cat Rescue
Entertainment Group, Inc., et al.

Dear Mr. Jakes:

Enclosed is the original errata page with your copy of the transcript so CAROLE BASKIN may read and sign. Please have her make whatever changes are necessary on the errata page and have her sign it. Then make a copy of the errata page for your copy of the transcript.

Please then forward a copy of the errata page to all parties involved in the case.

If you wish to waive the signature, please have Mrs. Baskin sign her name on the signature line at the bottom of this letter and forward a copy to all parties involved.

Your prompt attention to this matter is appreciated.

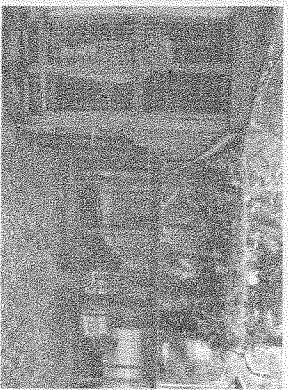
Sincerely,

Beverly Replogle
First Choice Reporting & Video Services, Inc.

I do hereby waive my signature

CAROLE BASKIN

cc: Eric C. Pinkard, Esquire



Big Cats & Public Safety Act
page 2



Cats Roar: Car to be Auctioned
page 5



Blind Bobcat Rescue
page 5

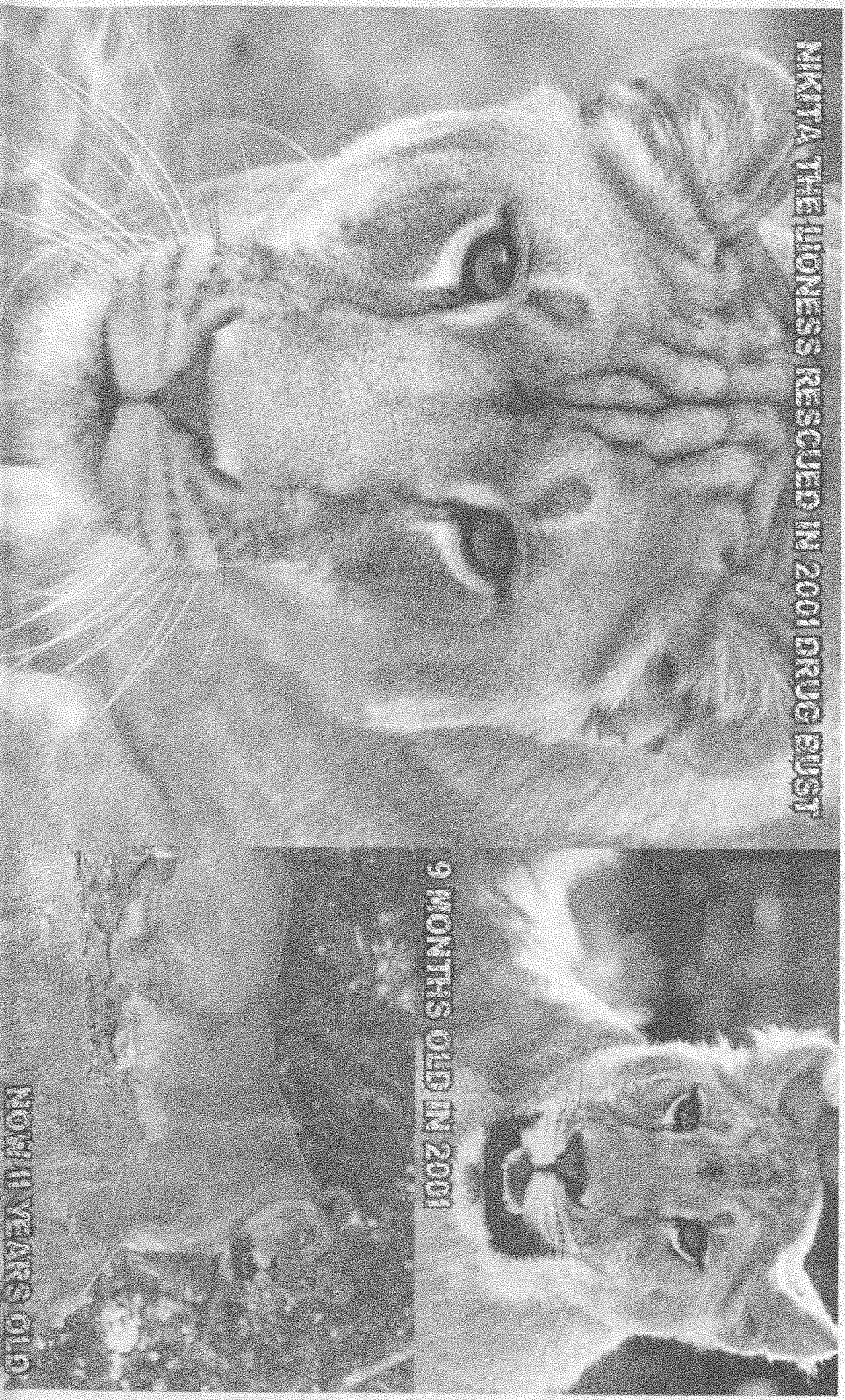


Big Cat Easter Fun
page 11

Photos by Jamie Veronica unless noted.

THE BIG CAT TIMES

NIKITA THE LIONESS RESCUED IN 2001 DRUG Bust



9 MONTHS OLD IN 2001

NOW 11 YEARS OLD

THE BIG CAT MATCH FOR AN ENCLOSURE FIT FOR A QUEEN

Nikita, a 9 month old lioness, was found chained to the wall in a crack house during a drug bust in Tennessee. Because she had been confined to a concrete floor, with nowhere soft to lay, she had huge fluid filled swellings on her elbows that took months to heal. She had been grossly underfed and was emaciated. Her diet was limited and lacking in essential vitamins causing a plethora of health issues as well. The authorities took her to the Nashville Zoo at Grassmere, but she had been declawed by her previous owner and could not live with the zoo's other lions who were fully clawed. She would be unable to defend herself within the pride. The zoo had to find a new home for Nikita. We agreed to take her in, as well as three bobcats, in November of 2001.

Nikita has flourished since her arrival, growing tall and filling out. She is very playful, often acting more like a kitten than a deadly predator. She joyfully gallops about her 3,000 square foot enclosure, smashing through the brush and swatting around her 60 pound toy ball as if it weighed nothing at all. Though we wish she had the freedom she deserves, we're so happy that she survived her earlier ordeals to enjoy the blissful days we strive to provide for her here.

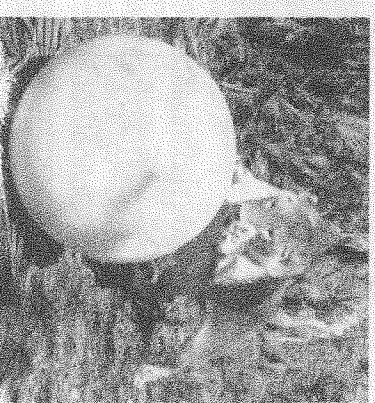
We have big plans to improve upon Nikita's enclosure with a 3,750 square foot addition that will more than double the space for this 400 pound lioness to romp. Two of the sanctuary's most generous and sustaining donors have leaped forth to help support this expansion in a BIG way!

Lawrence and Pamela Trissel have very generously presented the sanctuary with a \$10,000 matching grant to help raise the \$19,000 necessary to supesize Nikita's Cat-a-tat! Any donation made to Big Cat Rescue for this project will be matched dollar for dollar up to \$10,000. This 100% match means your donation has twice the impact!

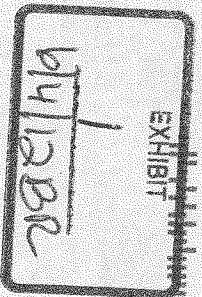
DONATIONS CAN BE MADE 3 WAYS:

- Online at <http://tinyurl.com/79j5154>
- By scanning the QR Code at right with your smart phone.
- Or you can send a check to Big Cat Rescue, 12802 Easy Street, Tampa, FL 33625 with "Nikita Match" in the memo section or in an enclosed note.

Any funds raised in excess of the cost of the expansion of Nikita's Cat-a-tat will be directed to the sanctuary's general fund in support of all of the magnificent animals that call Big Cat Rescue home.



Above: Nikita pounces after her big yellow ball, Photo by Julie Haman



4208-29733 7J RELATWAAE1E1
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REP. CASTOR COSPONSORS BIG CATS AND PUBLIC SAFETY PROTECTION ACT! THE BEST WAY FOR YOU TO HELP STOP ABUSE

By Howard Baskin

Those of you who have been following our efforts to stop big cat abuse through federal legislation know that on March 1, 2012 Rep. Buck McKeon (R-CA) and Rep. Loretta Sanchez (D-CA) introduced the bipartisan **Big Cats and Public Safety Protection Act, H.R. 4122**. The bill bans private possession and breeding of big cats, limiting the breeding primarily to AZA zoos. This bill is truly the only way to stop abuse of big cats in captivity. Experience has proven emphatically that trying to "regulate" to insure the cats are kept in humane conditions is simply impossible.

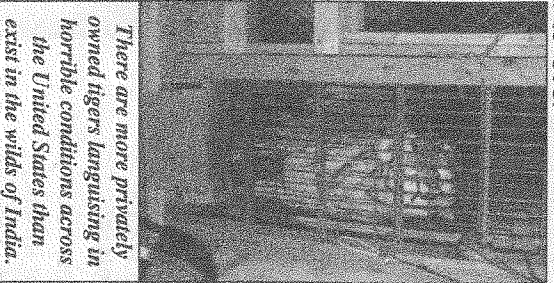
The task at hand now is to build momentum for the bill by asking members of Congress to "cosponsor" the bill. Cosponsoring simply means that the Representative is announcing their support for the bill in advance of the vote. Only about



4% of bills introduced pass in a given year. Often it takes years of building support to get a bill passed. By adding cosponsors as quickly as we can, we significantly increase the chances that the bill will move forward more quickly.

SAVING BIG CATS BY CHANGING LAWS & MINDS

The Big Cats and Public Safety Protection Act (HR 4122) is the most important piece of legislation to ever be introduced that will protect lions, tigers and other exotic wild cats from being kept as pets and in miserable roadside zoos. You always find out about the important big cat news first because you are one of our most valued supporters, but we have to get the message out to others too.



There are more privately owned tigers languishing in horrible conditions across the United States than exist in the wilds of India.

Big Cat Rescue Founder and CEO Carole Jaskin presented to the Massachusetts School of Law during their annual Animal Law Day on April 7th to a crowd of 100 attendees and then tabled the rest of

We are delighted to announce that Rep. Kathy Castor, who is the U.S. Representative for the district our house is in, quickly signed on as a cosponsor. Rep. Castor has been wonderfully responsive to animal welfare issues throughout her time in Washington. The Humane Society Legislative Fund keeps a "scorecard" showing



The bill has been in the works for a number of years and we are thrilled to see it finally introduced!

HOW CAN YOU HELP?

The single most important thing you can do if you want to help stop big cat abuse is ask your Representative to cosponsor this bill! Very few people actually contact their Representatives, so you really can have a real impact by doing this. You do not have to be an "expert" on the bill. We have a simple fact sheet that can help, and would be very happy to give you guidance on how to do this.

Above: Flavia demonstrates just how dangerous tigers can be. At Left: Representative Kathy Castor

the day speaking to nearly 600 guests. The presentation was on the Timeline of the Big Cat Crisis in America and what Big Cat Rescue has been doing to end the suffering and abuse of big cats, through legislative and educational efforts. The presentation was well received and 3 people actually came up to the podium in tears because they could not believe the horrible conditions that most big cats in private hands suffer.

Because the **Big Cats and Public Safety Protection Act** is the key bill to ending back yard breeding and the resulting over crowding and neglect, Big Cat Rescue has decided to be the Diamond Level sponsor of the Taking Action for Animals Conference in D.C. this July 27-30. We will be presenting

<http://tinyurl.com/cadrf5k>

If you would be willing to make this effort on behalf of the cats, I am happy to talk with you and make it easy for you to do. Please email:

Howard.Baskin@BigCatRescue.org

All Cosponsors from All States

Bill Name: Big Cats and Public Safety Protection Act			
Bill Number: H.R. 4122			
Cosponsor*	Cosponsor Name	Cosponsor Date	Send Mail
YES ✓	Paul Gohmert (D 7th)	03/28/2012	<input type="checkbox"/>
California			
YES ✓	Barbara Lee (D 9th)	04/16/2012	<input type="checkbox"/>
YES ✓	Sam Farr (D 17th)	03/01/2012	<input type="checkbox"/>
YES ✓	Elton Gallegly (R 24th)	03/08/2012	<input type="checkbox"/>
YES ✓	Howard McKeon (R 25th)	03/01/2012	<input type="checkbox"/>
YES ✓	Howard Sherman (D 28th)	04/25/2012	<input type="checkbox"/>
YES ✓	Loretta Sanchez (D 47th)	03/01/2012	<input type="checkbox"/>
Florida			
YES ✓	Kathy Castor (D 11th)	03/28/2012	<input type="checkbox"/>
Guam			
YES ✓	Moderne Serrano (D 1st)	04/18/2012	<input type="checkbox"/>
Illinois			
YES ✓	Jan Schakowsky (D 9th)	05/09/2012	<input type="checkbox"/>
Massachusetts			
YES ✓	Edward Markey (D 7th)	04/29/2012	<input type="checkbox"/>
Ohio			
YES ✓	Dan Rostenkowski (D 10th)	03/01/2012	<input type="checkbox"/>
YES ✓	Tim Ryan (D 17th)	04/25/2012	<input type="checkbox"/>
Oregon			
YES ✓	Evan Dammann (D 5th)	04/19/2012	<input type="checkbox"/>
YES ✓	Peter DeFazio (D 4th)	05/09/2012	<input type="checkbox"/>
Virginia			
YES ✓	James Moran (D 8th)	03/28/2012	<input type="checkbox"/>
YES ✓	Donald Conaway (D 11th)	03/28/2012	<input type="checkbox"/>

Legend: *NO = Not a cosponsor *S = Sponsor
 ✓ = We support the member's cosponsorship position
 ✗ = We do not support the member's cosponsorship position

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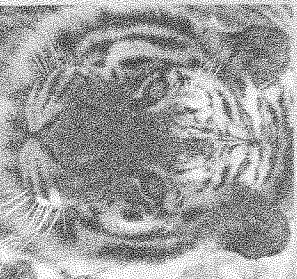
www.BigCatRescue.org info@BigCatRescue.org 813.920.4130

SAD FAREWELL TO FOUR GREAT CATS

By Jamie Veronica

Big Cat Rescue was founded 19 years ago and 82 of our 100+ sanctuary residents are now over the age of 15 (90+ in cat years). It is with great sadness that we must say goodbye to these four wonderful felines.

COOKIE



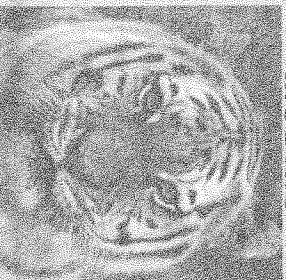
COOKIE was rescued from a backyard cage in Mississippi in December of 2008. She came from a failed facility called Cougar Haven, which at its peak was home to 38 big cats. There was never much local support for the facility since it was nothing more than an eccentric's private collection. The owner eventually abandoned the cats, leaving their care to a volunteer who couldn't stand by and watch the cats starve to death. Many had already died before Cookie, Alex, and Freckles came to Big Cat Rescue. Once at Big Cat Rescue, Cookie enjoyed life to the fullest. She was one of the favorites of all the volunteers and guests. She could always be counted on for a friendly greeting,

whether it be a chuff, an affectionate rub against the enclosure, or just following her keepers as they walked around outside her enclosure doing their daily chores for her. Cookie was diagnosed with a cancerous and inoperable tumor in her throat. We said a tearful goodbye to her on March 12, 2012. Her beauty, her playfulness, her sweet disposition will be missed by so many.

1994 - 2012

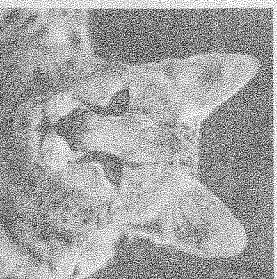
MODNIC was rescued from Savage Kingdom, a deplorable breeding facility that was finally shut down by officials in 2006, 5 years after a worker was killed by a tiger there. Modnic seemed to relish life at Big Cat Rescue. Her fresh water pool with a lake view, her mounds to climb and rest on, the shade of the oak trees around her enclosure, the perfume scented toys she played with - all these things gave Modnic experiences she had never enjoyed before. Unfortunately Modnic fell victim to mammary cancer. Last summer heroic efforts were made to give Modnic another year of happiness, however when her tumors recently returned, they were worse and another surgery would have taken a great toll on the elderly tigress.

MODNIC



1993 - 2012

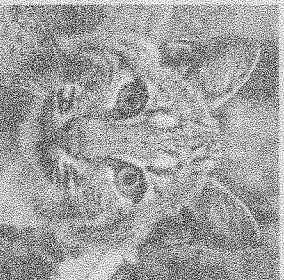
LUCKY



1993 - 2012

LUCKY arrived at Big Cat Rescue in 1993 from an auction in Okeechobee, Florida. She was named Lucky because she was very lucky to find a home like Big Cat Rescue where she can do all the things that come naturally to her and not be forced to conform to the role of a house pet. She was 19 years old when a mass was discovered on her side that turned out to be massive, cancerous mammary tumors. Lucky hated to be confined in any way. Rather than subject her to an extremely complicated, invasive surgery that would have only prolonged her life by months, we had to make the sad decision to say goodbye and set her spirit free.

RUFUS

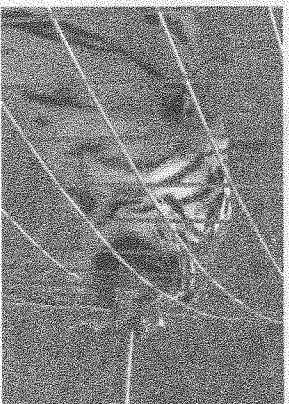


2011 - 2012

RUFUS was found injured and in a comatose state on the side of the road and taken to the Carolina Wildlife Center in South Carolina last December. The two month old bobcat had a broken jaw that was repaired, however, once he awoke his caregivers discovered he was blind. In the weeks following his rescue Rufus also battled seizures. Knowing that he would not be a candidate for release, the center contacted Big Cat Rescue to find a permanent home for the kitten. Upon his arrival Rufus was seen by a variety of specialists to determine the cause and the severity of his blindness and brain damage. Thanks to the gracious generosity of our supporters Rufus had an MRI that helped narrow down the possibilities for which a supportive treatment plan was put into place. Unfortunately his brain damage that was the cause of the seizures could not be healed completely and on April 26th Rufus had a massive seizure and died suddenly. Every attempt was made to resuscitate him, but sadly they were unsuccessful. Rufus will be missed dearly by everyone who got to know him. He was a special little kitten who touched many of our hearts.

BIG CAT VET CARE CHALLENGES SUBDUED

Providing veterinary care to more than 100 wild cats can be challenging so Big Cat Rescuers have to get creative. Our Operant Conditioning program is crucial to providing such care in an efficient and effective manner. Volunteers participate in this program in which the cats are given food rewards for doing simple tasks such as approaching the side of the enclosure, sitting or laying down, and even going into their food lockouts (a small cage attached to their enclosure in which they are fed) and allowing a door to be shut confining them in the lockout. The latter of these tasks has been extremely helpful to our veterinarians Dr. Wynn and Dr. Boorstein with their tasks of drawing blood and administering vaccinations.



Dr. Wynn was able to shut Bengali the tiger into his lockout and while he was happily accepting a constant supply of snacks from his keeper she successfully drew blood from his back leg without him noticing. The blood work was sent to the lab for routine screening. The results were great for a tiger his age (17).

To better facilitate routine vaccinations Dr. Boorstein constructed a device called the Cat-a-comb which is basically a comb made of 2x4's that can be placed through the top of the lockout and pivoted to pin the cat to the side of the lockout. Once pinned, vaccinations and microchips can be given and flea treatment can be applied. Big Cat Rescuers were surprised at how calm the cats were during this process and because of this the vet team is even able to perform a basic physical exam.



The Cat-a-comb has proven to be an extraordinary and stress free alternative to netting or sedating the cats for this routine veterinary care. The only downside to the new contraption is its weight. Constructed of wood, the Cat-a-comb weighs nearly 70 pounds!

Above: Operant conditioning with a tiger, Dr. Boorstein, Jamie Veronica and Gale Ingham use the Cat-a-comb to perform a physical exam and draw blood from Fluffy the serval



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BE A COOL CAT THIS SUMMER!

Summer is almost here! Have you made plans yet? Register now for Big Cat Rescues Cool Cat Summer Camp and Young Adult Expedition. Weekly camp sessions run from June 18th to August 9th.



Kids ages 8-15 and young adults 16-18 can join us for one wild time this summer! This unique opportunity comes around just once a year for future Big Cat Rescuers to enjoy behind-the-scenes activities, having fun and learning at the same time. Young adults considering careers in biology, conservation, or animal care will have a chance to experience a working sanctuary and test the water for their future pathways at our Young Adult Expedition.

Comments from previous campers say it all: "The first day of camp she talked all night not just about the fun she had, but about what she learned" and "My child loved it more than I ever thought he would!"

Young adults report: "I have grown to love the outdoors and now want to be a conservation activist and major in Environmental Sciences at University of Central Florida...I would use the knowledge gained to its full capacity and put it towards my efforts in saving our planet!"

Camp spaces are limited, so don't miss out! To register contact: Willow Hecht at education@bigcatrescue.org or 813-323-3265

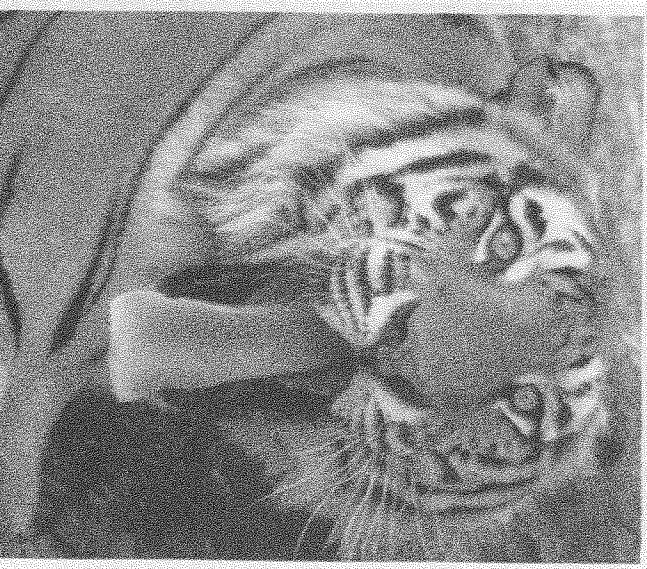
KIDS FOR KATS



Ian McFadden is a 14-year-old boy who has always had a passion for animals. He wants to become a zoologist when he grows up and would like to work specifically with big cats. After going on a tour of Big Cat Rescue, Ian's love for big cats intensified. He wanted to help the cats, and was able to raise \$128.87 in donations! He enjoyed raising the money for the sanctuary, and the cats appreciate it very much!



Puppy Pals recently gave the gift of a new Boomer Ball to Arthur, Andre, and Amanda, three tigers rescued from sanctuary that had gone bankrupt in Texas. As a special treat the group was invited to come to Big Cat Rescue for a tour and to watch as the ball was given to the tiger trio—it was quite the event, as Amanda rushed up to the new toy roaring in appreciation! Thanks, Puppy Pals!



WILD WORD SEARCH

E N P Z V Z H Z T I G E R E Y
 K C O U G A R B L I Z N I U V
 L A C A R A C U H F K E Z C V
 O K C E N R I C H M E N T S A
 G T O L E C O N S I Z F U E E
 A T A C Y O R F F O E G W R L
 S X O H A D R A P O E L I T A
 U J U N G L E C A T I U N A V
 G P L I O N H I W X R L U C R
 M X N Y L N A I R E B I S G E
 F S U M M E R C A M P V P I S
 V O L U N T E E R H U V V B M
 L H A H R M O F H Y D O Z U W
 Y Y R A U T C N A S T P Y I J
 Z B B U B O B C A T W I L D I

BIG CAT RESCUE BOBCAT CARACAL COUGAR
 ENRICHMENT GEOFFROY CAT JUNGLE CAT
 LEOPARD LION OCELOT SANCTUARY
 SERVAL SIBERIAN LYNX SUMMER CAMP
 TIGER VOLUNTEER WILD

Answers on page 11

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IN ROARING SUPPORT OF THE BIG CATS



Meet Cats Roar Magnum, The World's First Hybrid Hemi featuring one of the most elaborate paint jobs to date by globally renowned Airbrush Artist Mike Lavallee.

CatsRoarMagnum is a spectacular 2005 Dodge Magnum show car that has been awarded First Place, Best of Show, and Best Graphics at over two dozen prestigious events during the course of the past year.

This car will be auctioned off in support of Big Cat Rescue during car week in Monterey, CA August 2012 with 50% of the proceeds being very generously donated to Big Cat Rescue in support of the magnificent animals that call the sanctuary home. <http://www.montereycarweek.com/Events.html>

The art work (by Mike Lavallee of Overhauling fame) is 18 layers of House Of Kolor Shimmmin Paints with the last half almost entirely hand painted airbrushing. 6 layers of clear tops it off and keeps it looking like art under glass. Mike Used a few new formats and due to the spectacular nature of the car H.O.K. requested that it be submitted into their Preferred Painters Award Competition.

The orange in the nose is representative of the sunrise in Africa with the fire, urban grunge (oil spotting), cracking, and lighting meant to call attention to the strife and turmoil plaguing the country and the natural dangers faced by African Wildlife. The colors fade through sunset and into the deepest of nights as you reach the back of the car. The leopards and lions are listed by the International Union for Conservation of Nature as Near Threatened and Vulnerable respectively. The artwork is meant to bring attention to both Africa's wildlife and the plight of big cats around the world. Every view the car receives brings attention to the organizations supporting these beautiful animals.

This car is over 80% fully sponsored with about \$150,000 in makeover parts and labor.

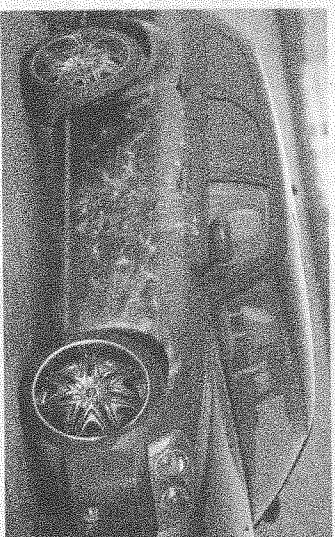
Owner/Director: John D. Callison, Artist: Mike Lavallee (Joint Design)



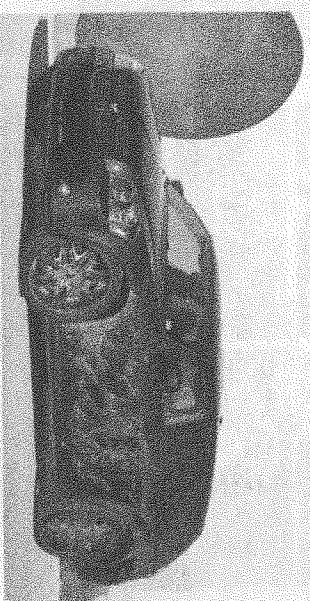
Everyone at Big Cat Rescue would like to extend a **ROAR** of gratitude to the participating Sponsors of the Cats Roar Magnum Project:

House of Kolor
CNC Ported & Polished
Race-Grade Cylinder Heads Labor By Gotelli
AAC/Oracle for Headlights, Foglights, and Interior LED

Pirelli Scorpion P235/65 Tires
Big Cat Rescue
DuPont Registry
Cougars of Florida (calendar)
Diablo Morpheus Wheels
Mothers Car Care Products and Support
Spectre Air Filter
Lifetime Oil Filter
Safelite Auto Glass
QuietRide Solutions

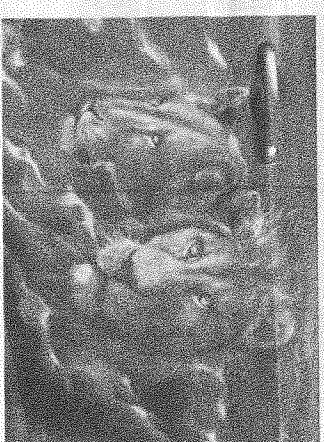


Eleven Eleven Watches
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Stevens Creek Dodge
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Conversions/Boost Systems
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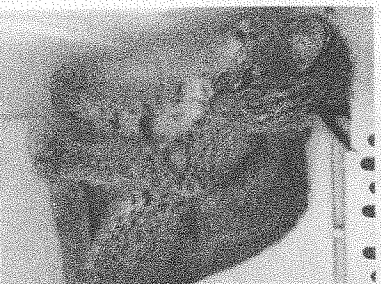


Please Follow us on Facebook! Just look up Cats Roar Magnum!
<http://www.facebook.com/CatsRoarMagnum>

You may get the chance to see the Cats Roar Magnum auctioned live during the "Mecum Auction: Muscle Cars & More". This televised event will air on Velocity, a Discovery Communications Channel on August 19th. Check your local listings.



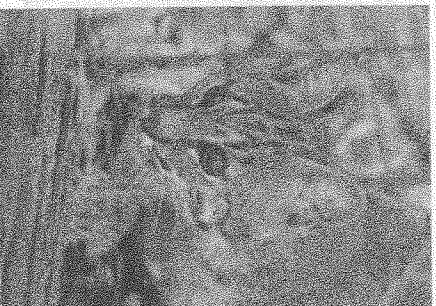
BLIND BOBCAT HAS PERMANENT HOME



Tommie, a female bobcat, was rescued earlier this year. She had been found wandering in search of food at a mine an hour north of Big Cat Rescue. She was emaciated and appeared to be blind. Tommie, named after her rescuer Cemex Manager Tommie Deaner, was seen by Dr. Miller, a Board Certified Ophthalmologist. Her retinas had detached resulting in her blindness. Her condition was most likely due to disease, but after a battery of blood tests still no answer has been found. Tommie tested negative for every known disease that could be the culprit, with the exception of Lyme Disease, which in rare cases can cause blindness. Until

a few weeks ago, Tommie had been living in quarantine in our onsite Cat Hospital. She has been on series of medications with the hopes of restoring her sight, none of which have been successful. Otherwise Tommie is the picture of health. She has doubled in weight since her arrival, her coat is sleek and glossy and her teeth are pearly white. Unfortunately because she is blind and no treatment has worked she will not be a candidate for release back into the wild. She will have a permanent home at the sanctuary and is now living in a 2,000 square foot enclosure that provides her with a life as close to the wild as we can give.

Left: Tommie underweight when she first arrived
Right: Tommie in her outdoor enclosure

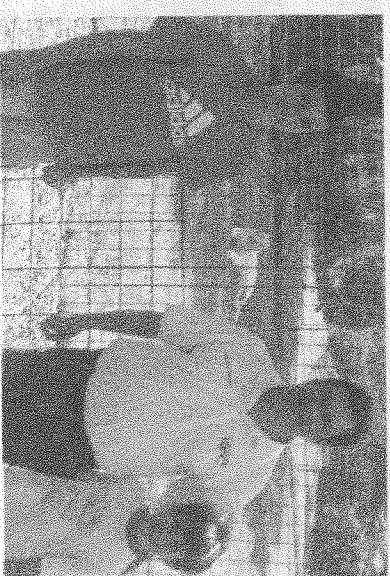


REP. BILIRAKIS VISITS BIG CAT RESCUE

In April we were honored by a visit from U.S. Representative Gus Bilirakis and two of his sons, Manuel and Nicholas. They are pictured here with Zabu the white tigress lounging in the shade behind them.

"I was impressed with my visit to the Big Cat Rescue program, particularly with how humanely all of their animals are treated," Bilirakis said. "The education Big Cat Rescue provides to adults and kids alike is both informative and interesting, and it is a true treasure for Tampa Bay." He promised to return with his other two sons, which we look forward to very much.

The sanctuary is in Rep. Bilirakis' district. Based on the way Bengali rubbed his head against the wire in approval, if tigers could vote, it looks Bilirakis would have won Bengal's support!



THE BIG CAT TRADING POST - GIFT GUIDE

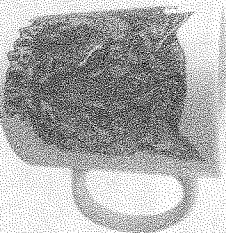
Proceeds from your gift purchases help take care of the big cats. Order these gift items using the order form on page 10 or visit BigCatRescue.biz to see all of our gift items and purchase online. S & H within the US as well as tax has already been included in the prices listed here. You can also upgrade your shipping to Priority for just \$3 for your entire order. For luxury cat themed gift items visit BigCatLuxGifts.com



BCR Camp Fire 16 oz. Mug
Choose Yellow or White \$13.70



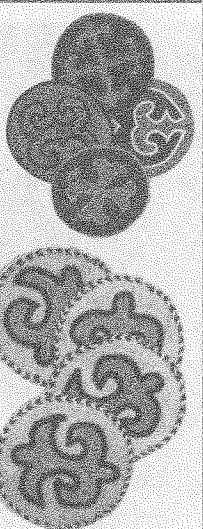
Skip the FL Bobcat 8 oz. Mug \$15.84



Tiger College 10 oz. Mug \$15.84



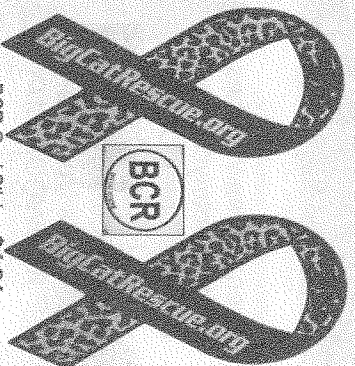
BCR Wine Cork
\$7.42
Leopard Wine Bag
\$4.21



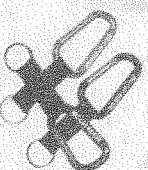
These items are produced by the Snow Leopard Trust.
Your purchase helps snow leopards in the wild.
Price for One Kazakh Hot Pad 10" \$16.98 ea.
Price for One Kazakh Centerpiece 17" \$23.40 ea.



Big Cat Vanity Plates Choose Black Leopard, Leopard, Lion, Tiger, Bobcat or Sand Cat \$10.56 ea.



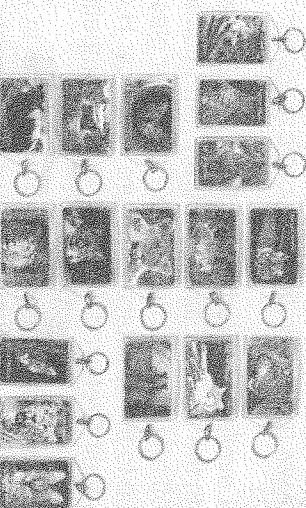
BCR Oval Sticker \$4.21
BCR Ribbon Magnet
Choose Gold or Silver \$8.35



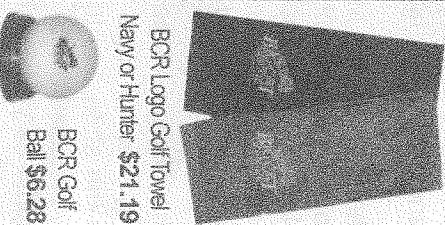
Carabiner Key Ring
Choose Gold, Black, Blue or Purple
\$5.21 each



Leopard Sticky Pen
Rotating message w/
each click \$4.00



Big Cat Photo Key Chain Choose Portrait - Leopard Cat, Bobcat, Cougar, Leopard, or Serval, Landscape - Sand Cat, 2 Lynx, Black Leopard, Tiger, Cougars, Lioness, Lynx, Lion, Snow Leopard, Bobcat, or 2 Ocelots \$5.21 ea.



BCR Logo Golf Towel
Navy or Hunter \$21.19
BCR Golf Ball \$6.28

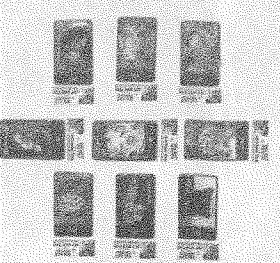


Photo Luggage Tags Choose Bobcat, Tiger, Sand Cat, Cougars, Snow Leopard, Lion, Cougar, or White Tiger \$4.50 ea.

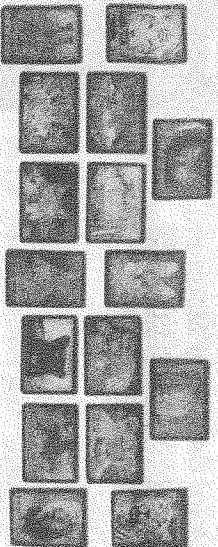
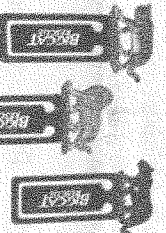
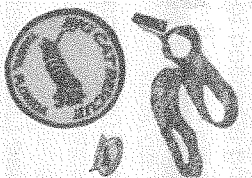


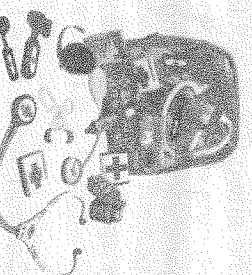
Photo Essel Magnets Choose White Tiger, 2 Ocelots, Sand Cat, Tiger, Cougars, Lynx, Leopard Cat, Lion (H), Black Leopard, Lioness, Ocelot, Leopard, Lion (V) \$3.14 ea.



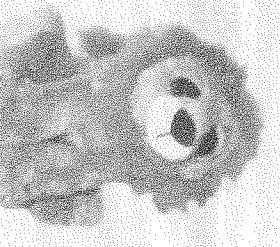
BCR Eramel Bookmarks Choose Tiger, Lion, or Black Leopard \$4.21 each



Lanyard \$7.35
BCR Patch \$5.28
BCR Pin \$5.28



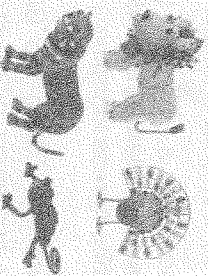
Toy Veterinarian Kit includes:
Stethoscope, syringe, medicine bottle, blood pressure pump, etc. \$10.56



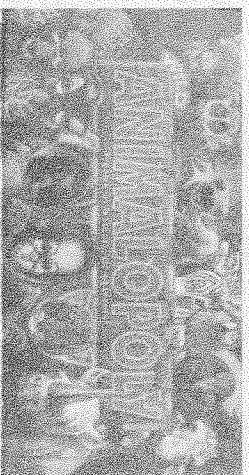
12" Roary the Lion \$13.70



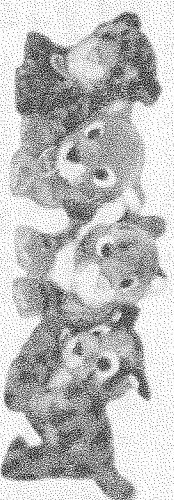
Logo Sunglasses Case
Red, Yellow, Lime, or Orange
\$9.49 ea.



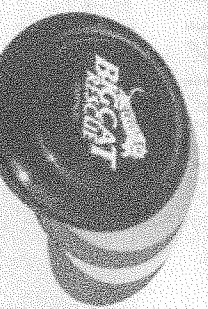
4" Handmade Beaded Figurine
Choose Lion, Tiger, Peacock
\$18.12 ea. Gecko \$13.77



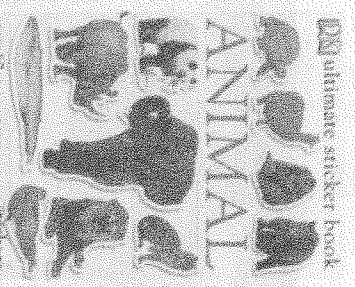
Themed Monopoly Board Game \$28.54



7" Aurora Babies Choose Narnia the Leopard, Leo the Lioness, Terrance the Tiger, or Lil Lehi the Bobcat \$9.49 each



Logo Frisbee, Black, Green, Blue, Yellow, or Red \$5.21 each



Ultimate Animal Sticker Book,
60 re-usable stickers \$11.63



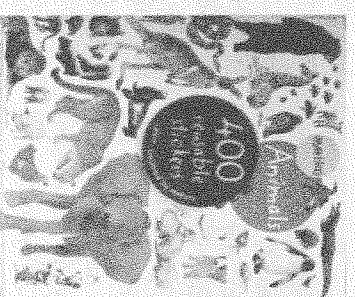
Ultimate Cat Sticker Book, 60 re-usable stickers \$11.63



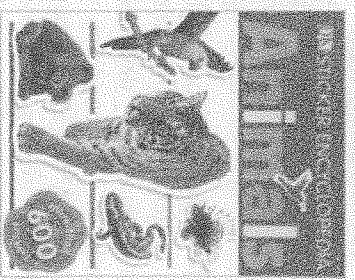
Tiger Flip Book - As You Flip the Pages, Get a 3 Dimensional Look Inside a Bengal Tiger \$21.80



Big & Busy Interactive Book 10 pages, ages 5+ \$13.77



400 Reusable Animal Sticker Book \$11.63

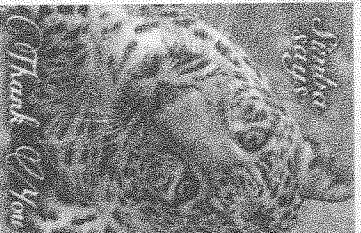


Encyclopedia Sticker Book with Over 600 Stickers \$19.60

 <p>Big Cat Rescue Fidel Cap Embroidered with BCR & Running Cat Choose Black or Khaki \$20.12</p>	 <p>Big Cat Rescue Cadel Cap Embroidered Big Cat Rescue text Choose Blue or Pink \$20.18</p>	 <p>Embroidered Adams Cap Choose Navy with Khaki Logo White with Blue Logo \$22.40</p>	 <p>Eco Bag with BCR Recycle Logo on Front 13" W by 10" D by 15" H \$13.70</p>	 <p>Khaki Green Canvas Bag Embroidered Logo \$29.75</p>	 <p>1" Tiger Face Pin \$11.70</p>	 <p>Photo Necklace Choose Any Species \$45.00</p>	 <p>Big Cat Rescue Tiger Watch \$28.75</p>
 <p>Big Cat Rescue Compass & Lion Tee S, M, L, XL \$24.40 XXL \$26.54</p>	 <p>Skip - FL Bobcat Tee S, M, L, XL \$24.40 XXL & XXXL \$26.54</p>	 <p>Bobcat Rehab Program Tee S, M, L, XL \$24.40 XXL & XXXL \$26.54</p>	 <p>BCR Papyrus Tee Red or Aqua Ladies Tee S, M, L, XL \$19.05 XXL \$21.19</p>	 <p>Property of BCR Tee Available in Blue or Gray S, M, L, XL \$24.40 XXL \$ 26.54</p>	 <p>Big Cat Rescue Tiger Shoe Laces \$9.49</p>	 <p>Big Cat Rescue Tiger Shoe Laces \$9.49</p>	 <p>Big Cat Rescue Tiger Shoe Laces \$9.49</p>
 <p>Yellow Ladies Polo with Navy Trim and Embroidered Logo S, M, L, XL \$39.45 Blue Polo with Navy Trim and Embroidered Logo S, M, L, XL \$40.45 XXL \$43.66</p>	 <p>BCR Baseball Tee Gray & Black S, M, L, XL \$24.40 XXL \$26.54</p>	 <p>Rhinstone Filled Tee in Black Choose Tiger, Snow Leopard or Leopard S, M, L, XL \$24.40 XXL \$26.54</p>	 <p>Rhinstone Ribbed Tank in Black with Snow Leopard S, M, L, XL \$22.26</p>	 <p>Haunting Eyes Tee Black with BCR Logo on Sleeve, Bengal or Siberian Tiger, Snow Leopard, or Sand Cat S, M, L, XL \$24.40 2X or 3X \$26.54</p>	 <p>Medium Socks fit Women 6-11 & Men 5-10 Shorty Pink Tiger \$9.49 Shorty Recycle Tiger \$9.49 Lion March \$9.49 Cat Silhouette \$9.49 Tiger Facts \$9.49 BCR White Lion \$9.49 BCR Black Tiger \$9.49 BCR Brown Tiger \$9.49 Shorty Tiger \$9.49 Shorty Leopard \$9.49</p>	 <p>Medium Socks fit Women 6-11 & Men 5-10 Shorty Pink Tiger \$9.49 Shorty Recycle Tiger \$9.49 Lion March \$9.49 Cat Silhouette \$9.49 Tiger Facts \$9.49 BCR White Lion \$9.49 BCR Black Tiger \$9.49 BCR Brown Tiger \$9.49 Shorty Tiger \$9.49 Shorty Leopard \$9.49</p>	 <p>Medium Socks fit Women 6-11 & Men 5-10 Shorty Pink Tiger \$9.49 Shorty Recycle Tiger \$9.49 Lion March \$9.49 Cat Silhouette \$9.49 Tiger Facts \$9.49 BCR White Lion \$9.49 BCR Black Tiger \$9.49 BCR Brown Tiger \$9.49 Shorty Tiger \$9.49 Shorty Leopard \$9.49</p>
 <p>Chocolate Rhinstone Junior Filled Tee S, M, L, XL \$24.40</p>	 <p>Big Cat Rescue Logo Tees Available in Royal, Charcoal, Azalea, Teal, Purple, and Pistachio S, M, L, XL \$18.05 XXL \$20.19</p>	 <p>Longsleeve Hooded Knit Tee Available in Eggplant or Black S, M, L, & XL \$31.89 XXL \$34.03</p>	 <p>Longsleeve Tee with Tiger Stripes on Chest & Sleeves & Big Cat Rescue on Back S, M, L, & XL \$29.75 XXL \$31.89</p>	 <p>Zipper Hoodie with Tiger Art on Front Black S, M, L, & XL \$42.52 XXL \$45.73</p>	 <p>Zipper Hoodie with Tiger Art on Front Black S, M, L, & XL \$42.52 XXL \$45.73</p>	 <p>Zipper Hoodie with Tiger Art on Front Black S, M, L, & XL \$42.52 XXL \$45.73</p>	 <p>Zipper Hoodie with Tiger Art on Front Black S, M, L, & XL \$42.52 XXL \$45.73</p>
 <p>Orange/White Tiger Baby Creeper BCR on Front XS, S, M & L \$13.70</p>	 <p>Big Cat Rescue Tiger Kids Tee Available in Blue or Pink XS, S, M & L \$15.91</p>	 <p>Paws Off Lion Kids Tee S, M & L \$16.91</p>	 <p>Jeweled Lion Kids Tee XS, S, M & L \$16.98</p>	 <p>Zipper Hoodie with Tiger Art on Front Black S, M, L, & XL \$42.52 XXL \$45.73</p>	 <p>Zipper Hoodie with Tiger Art on Front Black S, M, L, & XL \$42.52 XXL \$45.73</p>	 <p>Zipper Hoodie with Tiger Art on Front Black S, M, L, & XL \$42.52 XXL \$45.73</p>	 <p>Zipper Hoodie with Tiger Art on Front Black S, M, L, & XL \$42.52 XXL \$45.73</p>

BIG CAT RESCUE SUPPORTERS

\$5,000 Conde Nest	\$270 Laura Moreno	\$125 Joan Nodwell	\$100 Carol & John Malone
Nominated by client	\$250 Robert Davis	\$121 Recycling Center	\$100 Jae Munde
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\$2,500 Diane & Robert Klingel	\$250 Scott P. Fuhrman	\$119 Catco Dragon Jewelry	\$100 Diane Mick
\$2,500 Christine Newsom	\$250 Cindy Gruden	\$115 Jennifer Caswell	\$100 Kristin & Bradley Wilkessell
\$2,500 Community Bank	\$250 Earl McDaniel	\$115 Roberta & Jeffrey Newton	\$100 Margot Miller
\$2,100 Royal Manicoran	\$250 Judi Pate-Rodriguez	\$108 Melissa E. Black	\$100 Henry Miranda
Navy: The Official Honor	\$250 Peter Rosenstein	\$106 Justine & Styler Oros	\$100 Mike Moses
Harrington Fan Association	\$250 Helen & Bryce Sanson	\$105 Katie Quinn-Bennett	\$100 Hiroshi Miyoraku
\$2,000 Arlene Braga	\$250 Nancy Schneider	\$105 Paula Tomlinson	\$100 Claire Nardone
\$2,000 Panther	\$250 Joe Sokolovsky	\$104 Susan Countryman	\$100 Elizabeth Newsom
International, LLC	\$250 Eugenia Van Bremen	\$100 Theodor Andresen	\$100 Kelly O'Connor
\$1,950 Sole Riley Maritini	\$250 Patricia & Lon Wojnowicz	\$100 Michael Arznon	\$100 Mark O'Donnell
\$1,000 Justin Carpenter	\$250 Peter & Kathleen Muller Family Fund	\$100 Jane August	\$100 Adam Perrin
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Earth Fund Grant	\$200 Rob Dolecki	\$100 James S. Carpenter	\$100 Thelma Rodriguez
\$914 Whiskey Joe's	\$200 John & Debby Galenski	\$100 Virginia L. Carter	\$100 Barbara Rogers
\$900 Suzanne & Alan Lucas	\$200 Robert & Beatrice Kastenbaum	\$100 Nick Casciano	\$100 Paul & Lisa Romanowski
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\$500 Dan "Tiger Claw" Latver	\$150 Jan Ancker	\$100 Joe Duley	\$100 Lynn Waite
\$500 Karen J. Large & Eric Eisenberg	\$150 Alan Coleman	\$100 Barbara Ganschow	\$100 Judith Walker
\$500 Dwight Lowell	\$150 Brandy L. Cunningham	\$100 Connie Gee	\$100 Ann Wallinger
\$500 Lyia Messler	\$150 W.F. & Michelle Diss	\$100 Can Giddling	\$100 Pauline Ward
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\$500 Barry Vaughan	\$150 Sam & Ivan Iverson	\$100 Larry Han	\$100 Gay & Kay Woodworth
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\$400 Larry S. Moore	\$150 Guy Martin	\$100 Cheryl Hayes-Farrell	\$100 Body Fitness by Aris
\$400 Barbara Pope	\$150 Sheila & Brent Morgan	\$100 Michael R. Heinze	\$100 Chris County Fair Association
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\$340 Derek Scott	\$150 Doris Schlichter	\$100 George & Catherine Kozieratzki	\$100 Janet R. Krause
\$340 Christina Bond	\$150 Betsy Turner	\$100 Nancy & John Leclerc	\$100 Carol Lee
\$316 Skipaholic	\$150 Lisa Williams	\$140 Jessica L. Kirkpatrick	\$100 Danielle Lewis
\$300 Annarosa Berman	\$145 Sarah Geagan	\$140 Michele Marziano	\$100 R. D. Liddell
\$300 Stacie Carpenter	\$140 Shelley Pavlovich	\$138 Shelley Pavlovich	\$100 Nicki & Paul Lyford
\$300 Michelle & Scott Chamberlin	\$125 Diana DeLaCruz	\$125 Diana DeLaCruz	\$100 Mackenzie Maclean
\$300 Diane Freeman	\$125 Nicole Martha		\$100 Elyriade Maclean
\$300 David Nugent			\$100 Michael Malbran
\$300 Carl & Betsy Schino			
\$300 Jason C. Sosinski			
\$300 Starla Trivlino			
\$278 Brooksville/Spring Hill City Council			
\$275 William Konopaste			



Big Cat Sponsorship Levels and Benefits



All kits include the following appreciation gifts: 4-page color fact sheet about the species, Big Cat Rescue logo window decal, Registration Card to select the cat of your choice, 8x10 color photo of the cat you choose to sponsor with the cat name and your name as sponsor printed on it.

The sponsor levels below include these additional benefits and donor recognition:

\$25 BIG CAT BUDDY – KIDS SPONSORSHIP
Coloring pages featuring wild cats and 1 Kids' Tour Pass.

\$25 BIG CAT SUPPORTER
10% off purchases at the Trading Post gift shop.

\$50 BIG CAT FRIEND
10% off purchases at the Trading Post gift shop and 1 Day Tour Pass.

\$100 BIG CAT PROTECTOR
10% off purchases at the Trading Post gift shop, 2 Day Tour Passes, 30 big cat mailing labels, Donor name and gift amount listed in the Big Cat Times and on the donor page of bigcatrescue.org.

\$250 BIG CAT CONSERVATOR
10% off purchases at the Trading Post gift shop, 4 Day Tour Passes, 60 big cat mailing labels, Donor name and gift amount listed in the Big Cat Times and on the donor page of bigcatrescue.org.

\$500 BIG CAT WARRIOR
Conservator Benefits above plus: 4"x4" Ceramic plaque with big cat photo and donor name displayed at the sanctuary, 6"x12" Engraved plaque on the tour path with donor name displayed for one year

\$1,000 BIG CAT HERO
Conservator Benefits above plus: 6"x6" Ceramic plaque with big cat photo and donor name displayed at the sanctuary, 9"x12" Engraved plaque on the tour path with donor name displayed for one year, and Private Tour for up to 10 people.

\$2,500 BIG CAT CHAMPION
Conservator Benefits above plus: 8"x8" Ceramic plaque with big cat photo and donor name displayed at the sanctuary, 12"x12" color plaque on tour path with cat photo and donor name displayed for one year, and Private Founder Tour for up to 10 people.

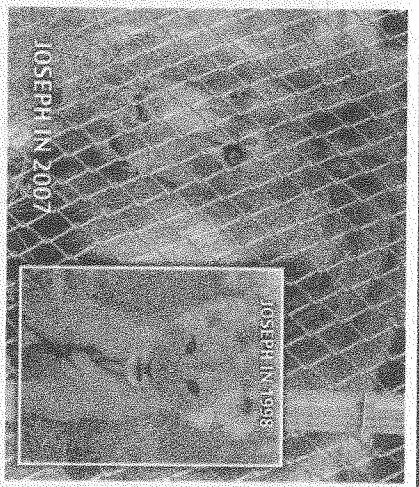
\$5,000 KING OF BEASTS
Conservator Benefits above plus: 12"x12" Ceramic plaque with big cat photo and donor name displayed at the sanctuary, 18"x24" Sign with big cat photo and donor name displayed on the tour path for one year, Private Founder Tour for up to 10 people.

BIG CAT BAN IN OHIO

By Carole Baskin

I knew that I was going to be surrounded by exotic animal owners who make both veiled and not so obscure threats such as, "before you bring me down...you will stop breathing!" I knew that they would be out en masse to object to a proposed law that would require that they register their wild animals and begin to act responsibly and humanely toward them. In April, the Senate committee voted 30 to 1 for a ban on owning big cats as pets. But rumor had it the House might be more inclined to perceive tigers as property rather than a danger and I felt that it was important to show them just how dangerous the conditions are where lions, tigers and other dangerous wild animals are kept in backyards.

asked Marie Collart if she would be willing to testify. Marie had a unique perspective that was important for the decision makers to hear. Back in 2003 she had first met Joseph and Sasha 2 lions, along with 6 tigers who were



in the back yard of a Gambier, OH woman. Seeing the lack of funding, which was resulting in the inadequacy of housing and vet care, Marie did what she did best and started a non-profit organization called the Siberian Tiger Conservation Foundation. Her intent was to bring in a professional board, raise funds, and provide these big cats with proper care. Unfortunately Marie's efforts were taken advantage of by the owner, who used a lot of the money raised for the cats for herself, squandering the funds on plastic surgery.

Despite the fact that Marie was working on her largest grant writing

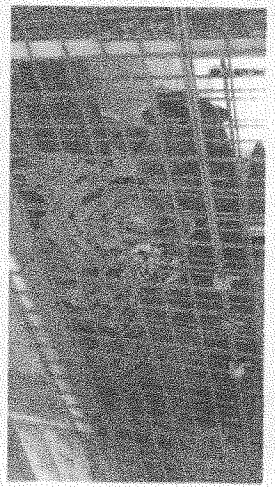
project of the year, she immediately agreed to testify on May 8th. She showed the House members adorable baby photos of Joseph the lion and contrasted them to the full size lion that he had grown into by age 3. Her point was to illustrate how people make bad decisions to buy these predators when they are cute and cuddly babies, only to find themselves in danger for their lives a few years later as the cats mature. Marie testified as to how often these owners had been trapped and in fear for their lives by the lions that they had bottle raised. She relayed a heart thumping account of how one of their trainers had been dragged across the compound by his foot.

Others, including Karen Minton of HSUS, Patty Finch the Executive Director of the Global Federation of Animal Sanctuaries, Cathy Cowan-Becker and her husband, the mother of a young man who was mauled to death at an Ohio compound by a bear, and the Sheriff who was in charge during the catastrophe in Zanesville gave excellent testimony as to why this bill is so necessary and so long over

due. My testimony was accompanied by 11 pages of photos: many from Ohio, of the conditions where lions, tigers and other wild cats are kept in backyards.

Animal lovers like us were, by far, in the minority at the hearings, which ran for 3 days straight. However the compelling testimony and example after example of inadequate living conditions and horrifying incidents state wide will surely persuade the House to support this ban on the trade of big cats, bears, giant pythons and other dangerous wild animals.

Stay tuned to see how the House votes. Check out CatLaws.com to see how you can help the big cats too.



Left and Above: Joseph lion, and Simba & Nikita tigers in Ohio back yard prior to being rescued by Big Cat Rescue in 2007

BIG DONATIONS FOR THE BIG CAT CLINIC!

Thanks to the very generous support of some wonderful friends in the healthcare industry as well as a Big Cat Rescue volunteer, our onsite Big Cat Hospital is now better equipped than ever to tend to the medical needs of the precious animals that call Big Cat Rescue home.



Employees at St. Anthony's and St. Joseph's Baycare hospitals recently heeded the call for medical equipment and literally leaped into action! Dean Waters at specialty healthcare supplier Tri-Anim and our friends Dave Wagner, Brigitte Ordonez, Brian Craig and Robyn Anderson helped provide a cordless/rechargeable set of electric clippers and 50 replacement blades as well as a Nonin 2500A Pulse Oximeter with lingual clips. The pulse oximeter is used to closely monitor a cat's heart rate and blood oxygen level while under sedation.

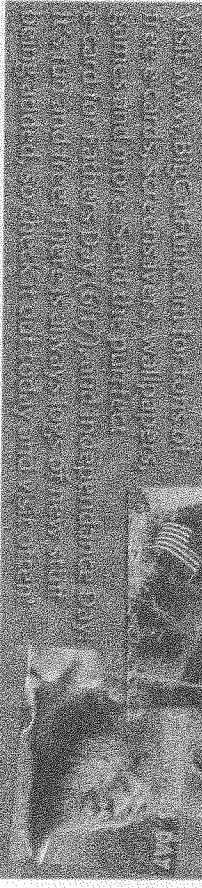
Our very own Senior Partner volunteer Pam Rodriguez generously funded the purchase of a Cardell BP Vet Specific Blood Pressure Monitor from Wendi Sitzmann, Sales Representative with Midmark Corporation.



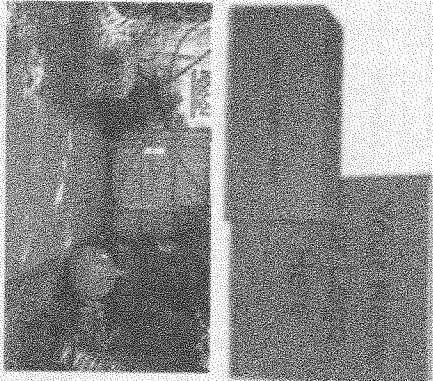
Also leaping into action in support of the cats was Mr. Stanley G. Tangalakis, Chairman, CEO of Mercury Medical in Clearwater, Florida and Product Specialists Dave Mieras and Steve Tyson. Their very generous donation of a Datascope Passport 2 Multi-parameter monitor and a Colin Blood Pressure and Pulse Oximeter will enable the sanctuary to provide the highest level of care for the big cats both in the Big Cat Hospital as well as in the field.

Everyone at Big Cat Rescue (especially the cats!) would like to extend a HUGE ROAR of gratitude in recognition of the generous support of these individuals and organizations!

FREE BIG CAT E CARDS



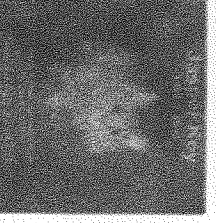
PAVE THE WAY: HONOR SOMEONE SPECIAL



Engraved pathway bricks make a great gift for the purr-son in your life who has everything. The laser engraving changes the brick color to create the letters deep into the brick and will never wear off. There are two sizes, 4x8 for a donation of \$100 and 8x8 for a donation of \$200. What a great way to support the cats and create a memory for yourself or someone else. You can order on page 10, or online: <http://tiny.cc/k8ey0>

FOREVER REMEMBERED

Permanently remember a beloved pet that has passed with an 8"x8" engraved granite plaque displayed on our memorial wall. These elegant plaques are normally \$500, but for a limited time, until July 31st, we are offering them at a reduced rate of \$250! <http://tinyurl.com/6tvoapv>

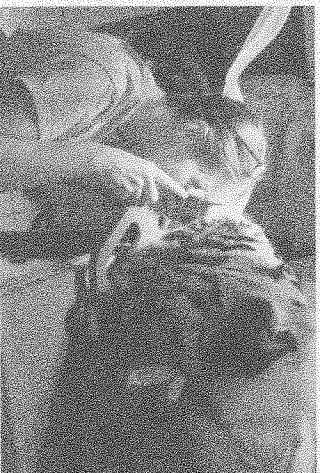


TINY GEOFFROY CATS TO MASSIVE TIGERS THEY ALL GET GREAT DENTAL CARE

From a 3-pound Geoffroy Cat to a 500-pound tiger, our dentists do it all. Dr. Peak has donated his services and that of his assistants for many years and we just cannot thank him enough. He has handled the bigger cats teeth as his equipment is more specially designed for big teeth. If you need an expert, who just happens to love animals and be an awfully nice guy, then check him out at:

<http://thepdentist.com/>

and was in the room at that awful moment. Dr. Boorstein, who was on the property, also rushed to the scene. Dr. Wynn leaped up onto the operating table and began chest compressions while the other vets administered reversal agents to try and bring him back.

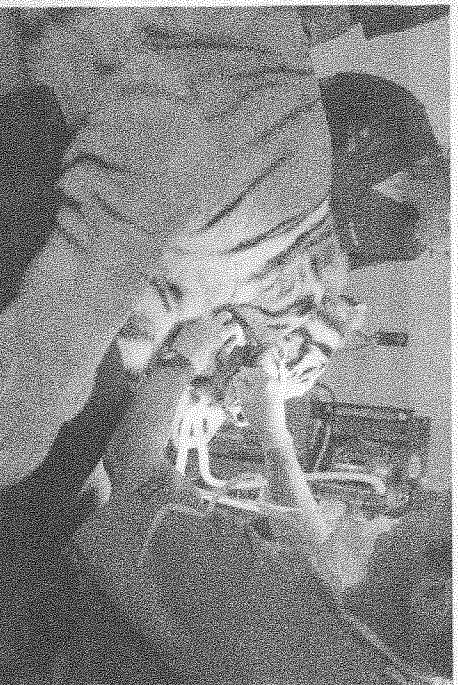


During an extensive root canal on four of Andre the tiger's canines the very worst thing that could happen, did happen. Andre the tiger died on the table.

Only two of Andre's canines were completed but temporary measures were made with his other two teeth and now that he is completely recovered we will be rescheduling the rest of his dental work with Dr. Peak very soon.



Our primary vet, Dr. Liz Wynn, is always here to assist during dentals and it just so happened that Dr. Miller, our eye expert, was here to check on some of her patients



WARNED IN 1983 AZA FINALLY CALLS FOR AN END TO THE PRACTICE OF BREEDING WHITE TIGERS AND WHITE LIONS

In June 2011 the board of directors for the American Zoological Association (AZA) formalized their 2008 ban on the breeding of white tigers, white lions or king cheetahs by their member zoos. Their report said, "Breeding practices that increase the physical expression of single rare alleles (i.e., rare genetic traits) through intentional inbreeding, for example intentional breeding to achieve rare color-morphs such as



Dr. Wynn does plenty of dental work in pet practice, so when Nico the Geoffroy Cat had an abscess on her cheek she was taken to Ehrlich

Animal Hospital. What made it very delicate work is the fact that Nico is the size of a domestic cat kitten and yet is 19 years old. Nico is very old for a Geoffroy Cat, so it was pretty scary to think of her being sedated, but she did



amazingly well. Due to her advanced age Dr. Wynn wasn't sure how well or quickly she would heal. But just a few days later Nico was back to her old self and was ready to go back outside to her enclosure. Nico's abscess has since completely healed and she appears to be feeling much better.

Clockwise from left: Andre, Dr. Miller examines Andre's eyes for research, Nico, Dr. Wynn extracts Nico's tooth, Dr. Peak performing a root canal on Andre

white tigers, deer, and alligators, has been clearly linked with various abnormal, debilitating, and, at times, lethal, external and internal conditions and characteristics, which are outlined in this paper." This change in policy came more than 12 years after Big Cat Rescue first released Dr. Laughlin's expose here: <http://tinyurl.com/7ymcug>

Because of the inbreeding and resulting genetic defects the American Zoological Association barred member zoos from breeding white tigers, white lions and king cheetahs in a white paper adopted by the board of directors in July 2011.

It is noteworthy that the first person to speak out against the displaying of white tigers was William Conway, director of the NY Zoological Association, which later became known as the Bronx zoo when he said, "White tigers are freaks. It's not the role of a zoo to show two headed calves and white tigers." He warned AZA in 1983 of the harm to

the zoo's credibility in catering to the public's fascination with freaks, but went unheeded until 2008 when AZA issued a request to their members to stop breeding white tigers and then later in July 2011 when the AZA formally adopted that stance as policy. Conway was attacked by Ed Maruska of the Cincinnati Zoo and other zoos that were

profiting by inbreeding tigers to get white coats, but in the end Conway's belief was validated.

Left: White tigers are often born with a variety of defects associated with inbreeding. This tiger has major defects in the constructions of his face and jaw. Above: Scan the QR code to discover the truth about white tigers, Zabu the tiger discarded by the zoo industry



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 Meet all Big Cat Rescue on all your favorite sites!

BIG CATS

Like us on Facebook
 Follow us on Twitter
 Subscribe to our YouTube Channel

Big Cat Rescue Online
 Big Cat

BIG CAT APP

Hundreds of big cat photos that you can download as wallpaper or email to friends, each cat's rescue story and fun facts too!

Available on the App Store
 Available on Google Play

Compatible with:
 iPhone, iPod touch, and iPad. Requires iOS 3.2 or later
 Android 2.2 and up

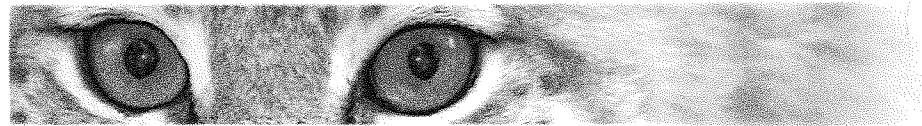
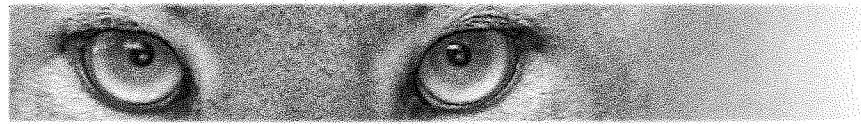
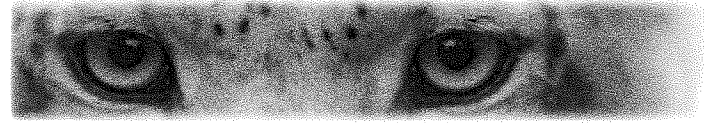
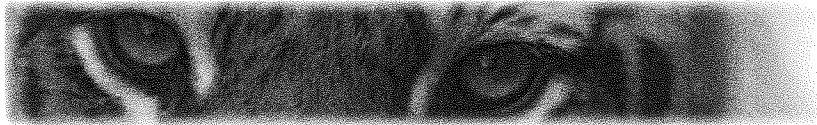


EXHIBIT
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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

BIG CAT RESCUE CORP.,
a Florida not for profit corporation,

Plaintiff,

vs.

CASE NO. _____

**BIG CAT RESCUE
ENTERTAINMENT GROUP,
INC., an Oklahoma Corporation,
G.W. EXOTIC MEMORIAL ANIMAL
FOUNDATION d/b/a Big Cat Rescue
Entertainment Group, an Oklahoma
Corporation, JOE SCHREIBVOGEL,
a/k/a Joe Exotic a/k/a Aarron Alex a/k/a
Cody Ryan, individually, BETH CORLEY,
individually, and VICKY WELCH,
individually,**

Defendants.
_____)

COMPLAINT

Plaintiff, BIG CAT RESCUE CORP., a Florida not-for-profit corporation, sues Defendants, BIG CAT RESCUE ENTERTAINMENT GROUP, INC., an Oklahoma corporation, G.W. EXOTIC MEMORIAL ANIMAL FOUNDATION d/b/a Big Cat Rescue Entertainment Group, an Oklahoma Corporation, JOE SCHREIBVOGEL a/k/a Joe Exotic a/k/a Aaron Alex a/k/a Cody Ryan, individually, BETH CORLEY, individually, and VICKY WELCH, individually, and alleges:

PARTIES

1. Plaintiff, BIG CAT RESCUE CORP. ("BCR Corp"), is a not-for-profit corporation duly organized under the laws of the state of Florida which maintains its

EXHIBIT
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principal place of business at 12802 Easy Street, Tampa, Florida 33625. BCR Corp's Chief Executive Office is Carole Baskin.

2. Defendant, BIG CAT RESCUE ENTERTAINMENT GROUP, INC., ("BCR Entertainment"), is a corporation organized under the laws of the State of Oklahoma with its principal place of business at 25803 N. CR 3250, Wynnewood, Oklahoma 73098.

3. Defendant, G.W. EXOTIC ANIMAL MEMORIAL FOUNDATION ("GWE"), is a corporation organized under the laws of the State of Oklahoma with its principal place of business at 25803 N. CR 3250, Wynnewood, Oklahoma 73098. In the Spring of 2010, GWE filed the trade names "Big Cat Rescue Entertainment" and "The Carol Baskin Entertainment Group" with the Oklahoma Secretary of State.

4. Defendant JOE SCHREIBVOGEL ("Schreibvogel") is an individual residing in Wynnewood, Oklahoma. At various times, Schreibvogel has employed the following aliases: "Joe Exotic," "Aaron Alex" and "Cody Ryan." Schreibvogel is an incorporator of both BCR Entertainment and GWE. Upon information and belief, Schreibvogel is an officer and shareholder in, and employee of both BCR Entertainment and GWE and all of his actions which are the subject of this lawsuit were undertaken in his capacity as an officer and agent of BCR Entertainment and GWE.

5. Defendant BETH CORLEY ("Corley") is an individual who, upon information and belief, resides in Wynnewood, Oklahoma. Corley holds a license from the U.S. Department of Agriculture for the breeding and exhibition of exotic animals. Upon information and belief, BCR Entertainment has exhibited exotic animals using Corley's USDA license. Corley has been identified alternatively as "Director" and a

"worker" for BCR Entertainment. Corley maintains and houses her exotic animals at the GWE facility in Wynnewood, Oklahoma.

6. Defendant VICKY WELCH ("Welch") is an individual who, upon information and belief, resides in Wynnewood, Oklahoma. Welch is the registered owner of the URL www.tigersinneed.org. BCR Entertainment uses the www.tigersinneed.com URL on its business cards and advertising materials.

JURISDICTION AND VENUE

7. This Court has jurisdiction under the provisions of 15 U.S.C § 1121, 28 U.S.C. §§ 1338(a) & 1367.

8. Defendants are subject to the personal jurisdiction of this Court pursuant to the Florida Long Arm Statute, Fla. Stat. § 48.193(2010). Specifically, at all times relevant, Defendants have continuously and regularly engaged in substantial and not isolated business activities within the State of Florida. For example, the only telephone number advertised for Defendant BCR Entertainment is in area code 813. The website used and promoted by Defendant BCR Entertainment and registered to Defendant Welch, www.tigersinneed.com, solely lists a Florida office. Additionally, Defendants are personally subject to the jurisdiction of this Court because they have committed tortious acts causing injury within the State of Florida by advertising, promoting, marketing and offering the exhibition of exotic animals which infringe and violate BCR Corp's trademark and service mark rights.

9. Venue is appropriate in this district pursuant to 28 U.S.C. § 1391(b) & 1391(c) and in this Division pursuant to Local Rule 1.02, M.D.Fla. Local Rules.

GENERAL ALLEGATIONS

10. Initially formed in 1995, BCR Corp is a not for profit organization registered with the IRS as a §501(c)(3) entity. The mission of BCR Corp is to provide the best home they can for the animals in their care and to reduce the number of cats that suffer the fate of abuse, abandonment or extinction by teaching people about the plight of the cats, both in the wild and in captivity, and how they can help through their behavior and support of better laws to protect the cats.

11. Since at least as early as November 2003, BCR Corp has prominently advertised, marketed and promoted itself under the mark: BIG CAT RESCUE. Due to pervasive, continuous and exclusive use of the BIG CAT RESCUE mark by BCR Corp in interstate commerce, the not for profit services offered by BCR Corp in fulfilling its mission have come to be associated exclusively with BCR Corp. The BIG CAT RESCUE mark has come to be recognized by the relevant public as identifying the services offered by BCR Corp. Indeed, the BIG CAT RESCUE mark constitutes an asset of significant goodwill for BCR Corp.

12. BCR is the owner of the federally registered mark:



Reg. No. 2,918,642. While BCR Corp's registered design mark disclaims exclusive rights to the words: "Big Cat Rescue," BCR Corp expressly claims rights to the words in the design mark depicted above. BCR Corp's registered mark is on the Principal Register

of the United States Patent and Trademark Office, remains in full force and good standing, and has achieved incontestable status under 15 U.S.C. § 1065.

13. As part of its mission, BCR Corp engages in a public awareness campaign seeking to call attention to the exploitation of exotic feline animals such as lions and tigers. As a direct consequence of its public awareness campaign, BCR Corp has incurred the ire of those who seek to profit and reap pecuniary gain from the exploitation of such exotic animals. Among the exploiters of exotic animals that BCR Corp has exposed to public scrutiny are Defendants GWE and Schreibvogel.

14. Defendants GWE and Schreibvogel have been engaged in a counter-campaign of disinformation, misinformation and disparagement seeking to deflect criticism of their exploitative conduct by attempting to diminish the credibility and goodwill of BCR Corp.

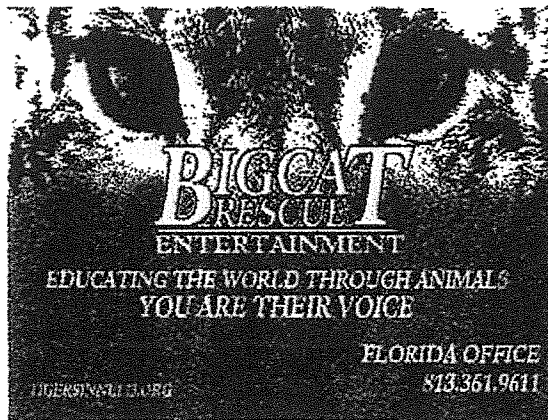
15. In early 2010, Defendants GWE and Schreibvogel conceived of a plan to harm the credibility and goodwill of BCR Corp by causing public confusion through the adoption of a misleading and confusing name, BIG CAT RESCUE ENTERTAINMENT, to be utilized in the very exploitative exhibition of exotic animals that BCR Corp seeks to eradicate. By so doing, Defendants sought to disparage BCR Corp and dilute the goodwill in its BIG CAT RESCUE mark and federally registered mark by causing the public to mistakenly believe that BCR Corp was engaged in the despicable exploitation of exotic animals. Indeed, while employing one of his aliases, Joe Exotic, Defendant Schreibvogel boasted on Facebook.com that he "registered the Big Cat Rescue Entertainment" name so BCR Corp "could ruin" its goodwill "on google all by your self [sic], and it is working."

16. Initially, Defendant GWE sought to register the deceptive and confusingly

similar BIG CAT RESCUE ENTERTAINMENT name itself in Oklahoma. Upon information and belief, the Defendants concluded that they could create a legal buffer for themselves by incorporating under the BIG CAT RESCUE ENTERTAINMENT name. To effect this strategy, Defendant GWE dropped its trade name filing, although it retained its trade name filing for "The Carol Baskin Entertainment Group," presumably a back-up filing to allow Defendant GWE to disparage BCR Corp's CEO in a similar fashion, if required.

17. After enlisting the aid of Defendants Corley and Welch, Defendants embarked on a conscious plan to exploit exotic animals through commercial exhibitions across the United States under the deceptive and confusingly similar name BIG CAT RESCUE ENTERTAINMENT. As components of this scheme, Defendants:

- a. Adopted a design depiction of the deceptive and confusingly similar BIG CAT RESCUE ENTERTAINMENT name in a style intended to copy BCR Corp's federally registered design mark:



- b. Utilized a photo of a snow leopard's eyes virtually identical to the photograph of a snow leopard that is used as the focal point of BCR Corp's

website: www.bigcatrescue.org.

- c. Purchased a Florida telephone number in the 813 area code and have "Florida Office" printed above it on marketing materials to further cause the public to mistakenly believe that Defendants' business was the same as or affiliated with BCR Corp.

18. Since at least October 27 2010, Defendants have conducted commercial exhibitions of exotic animals using animals from Defendant GWE and/or Defendant Corley at various locations under the deceptive and confusingly similar name: BIG CAT RESCUE ENTERTAINMENT.

COUNT I

Infringement of Federally Registered Trademark

19. Paragraphs 1 through 18 are incorporated and realleged by reference.

20. This is a suit for trademark infringement and arises under the trademark laws of the United States, namely, Title 15 of the United States Code and more particularly, 15 U.S.C. §§ 1116-18, inclusive.

21. Defendants' use of the BIG CAT RESCUE ENTERTAINMENT mark in advertising and promoting its exhibitions of exotic animals constitutes the use, without the Plaintiff/Registrant's approval, of a colorable imitation of Plaintiffs registered mark in connection with the sale, offering for sale, distribution or advertising of goods and services in a manner likely to cause confusion or mistake, or to deceive as to the source or origin of such goods or services.

22. Defendants' conduct has created and will create confusion among the members of the relevant consuming public and will cause irreparable and immediate injury

to Plaintiff for which Plaintiff has no adequate remedy at law.

23. Plaintiff has been damaged by Defendants' infringement of its registered mark.

24. Defendants' conduct was willful, intentional and with full knowledge of BCR Corp's superior rights.

COUNT II

False Designation of Origin Under § 43(a) of the Lanham Act

25. Paragraphs 1 through 24 are incorporated and realleged by reference.

26. This is an action for false designation of origin under § 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

27. BCR Corp's marks have become uniquely associated with and identifies BCR Corp and its services.

28. Defendants' use of BCR Corp's stylized BIG CAT RESCUE mark along with the prominent snow leopard photograph and 813 area code telephone number and "Florida Office" printed above the phone number on marketing materials constitutes the use of false designation of origin in violation of 15 U.S.C. § 1125(a).

29. Defendants' conduct is likely to cause confusion or to cause mistake or to deceive as to the affiliation, connection or association of Defendants and their exploitative exhibition of exotic animals with BCR Corp or as to the origin sponsorship, or approval of Defendants' commercial activities by BCR Corp.

30. Defendants' infringing and violative conduct has caused irreparable and immediate injury to BCR Corp for which it has no adequate remedy at law.

31. BCR Corp has suffered damages as a result of Defendants' violation of 15

U.S.C. § 1125(a).

32. Defendants' conduct was willful, intentional and with full knowledge of Plaintiff's superior rights.

COUNT III

Common Law Unfair Competition

33. Paragraphs 1 through 32 are incorporated and realleged by reference.

34. This count arises under the Florida common law of unfair competition. Jurisdiction is pendant to Count I pursuant to 28 U.S.C. § 1338(b).

35. By committing the acts herein alleged, Defendants are guilty of unfair competition, deceptive advertising and unfair trade practices, in violation of the Florida common law of unfair competition.

36. Defendants' acts of unfair competition are likely to cause confusion, deception and mistake, and have caused, and will continue to cause, irreparable and immediate injury to BCR Corp for which it has no adequate remedy at law.

37. BCR Corp has suffered damage as a result of Defendants' acts of unfair competition.

38. Defendants' acts of unfair competition are in willful and wanton disregard of BCR Corp's rights.

COUNT IV

Common Law Trademark Infringement

39. Paragraphs 1 through 38 are incorporated and realleged by reference.

40. This count arises under Florida common law trademark infringement. Jurisdiction is pendant to Count I pursuant to 28 U.S.C. § 1338(b).

41. BCR Corp's BIG CAT RESCUE mark is subject to common law trademark protection.

42. Defendants' conduct is likely to cause confusion, deception and mistake, and has caused, and will continue to cause, irreparable and immediate injury to BCR Corp for which it has no adequate remedy at law.

43. BCR Corp has suffered damage as a result of Defendants' acts of unfair competition.

44. Defendants' acts of common law trademark infringement are in willful and wanton disregard of BCR Corp's rights.

PRAYER AS TO ALL COUNTS

WHEREFORE, Plaintiff demands:

a. That Defendants, their agents, servants, employees and, attorneys, and all those persons in active concert or participation with it, be temporarily and thereafter, permanently enjoined and restrained from:

- (1) Using the "BIG CAT RESCUE" design mark, the phrase " BIG CAT RESCUE", or any confusingly similar design alone or in combination with other words as a service mark, trademark, trade name, component or otherwise, to mark it, advertise or otherwise identify Defendants' services;
- (2) Otherwise infringing the " BIG CAT RESCUE" mark;
- (3) Unfairly competing with Plaintiff in any manner whatsoever; and
- (4) Causing likelihood of confusion, injury to business reputation, or dilution of the distinctiveness of Plaintiff's mark;

- b. That Defendants be required to recall from their customers and deliver up and destroy all devices, literature and advertising and other material bearing the infringing designation;
- c. That Plaintiff be awarded its damages and Defendants' profits, and that this award of damages and profits be trebled pursuant to 15 U.S.C. § 1117(a);
- d. That Plaintiff be awarded a reasonable attorney's fee pursuant to 15 U.S.C. § 1117;
- e. That Plaintiff has and recover its costs in this action pursuant to 15 U.S.C. § 1117 and Fed. R. Civ. P. 54(d)(1);
- f. That Plaintiff be awarded punitive damages in excess of \$1 million; and
- g. That Plaintiff has such other and further relief as this court may deem just and proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands trial by jury on all issues so triable.

/s/ Frank R. Jakes

Frank R. Jakes
Florida Bar No. 372226
E-Mail: FrankJ@jpfirm.com
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TEL: (813) 225-2500
FAX: (813) 223-7118
Attorneys for Plaintiff

BIGGEST BIGGEST INTERNATIONAL

BigCatEntertainment@gmail.com

2/12/2011

Trademark Electronic Search System (TESS)



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Word Mark BIG CAT RESCUE

Goods and Services IC 036. US 100 101 102. G & S: Charitable fund raising services. FIRST USE: 20031100. FIRST USE IN COMMERCE: 20031100

IC 039. US 100 105. G & S: Animal rescue services. FIRST USE: 20031100. FIRST USE IN COMMERCE: 20031100

IC 041. US 100 101 107. G & S: Entertainment services, namely, animal exhibitions; educational services, namely, providing instruction in animal conservation and care. FIRST USE: 20031100. FIRST USE IN COMMERCE: 20031100

Mark Drawing Code (3) DESIGN PLUS WORDS, LETTERS, AND/OR NUMBERS

Design Search Code 03.01.03 - Cats, tigers or other large cats; Cheetahs; Jaguars; Leopard; Lynx; Ocelots; Panther; Panthers; Puma; Tigers

03.01.24 - Stylized cats, dogs, wolves, foxes, bears, lions, tigers

Serial Number 76568568

Filing Date January 7, 2004

Current Filing Basis 1A

Original