

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

**CAROLE BASKIN, an individual,**

**and**

**HOWARD BASKIN, an individual,**

**Plaintiffs,**

**vs.**

**CASE NO. \_\_\_\_\_**

**ROYAL GOODE PRODUCTIONS  
LLC., a New York limited liability  
company, and NETFLIX, INC., a  
Delaware corporation,**

**Defendants.**

\_\_\_\_\_ /

**DECLARATION OF CAROLE BASKIN**

I, Carole Baskin, state as follows:

1. My name is Carole Baskin and I am a resident of the State of Florida.

I am over eighteen (18) years of age and fully competent in making this Declaration, the facts of which are based upon my personal knowledge.

2. I am the founder and CEO of Big Cat Rescue Corp. ("Big Cat Rescue") which operates a sanctuary for abused and abandoned exotic felines located in Hillsborough County, Florida. Big Cat Rescue also is engaged in efforts to combat the abuse of big cats occasioned by private ownership, breeding in captivity and

the commercial exploitation of cub petting. In this regard, Big Cat Rescue seeks to educate the public, expose wrongdoers and lobby for legislative change to protect big cats and end the private ownership of these exotic animals.

3. Big Cat Rescue is accredited by The Global Federation of Animal Sanctuaries, which is to sanctuaries what the Association of Zoos and Aquariums is to zoos, requiring the highest standards of care in the industry. Big Cat Rescue is licensed by and in good standing with the United States Department of Agriculture (USDA) and the Florida Fish & Wildlife Conservation Commission (FWC) and is registered with the state of Florida as a charity. Big Cat Rescue is certified by Independent Charities of America as a “Best in America Charity” and every year since 2011 has received the highest four-star rating from Charity Navigator, the leading charity rating agency. Only 4% of the thousands of charities they evaluate have received nine consecutive four-star ratings.

4. I have successfully rehabbed and released of over 40 orphaned or injured native Florida bobcats and believe that I have by far the most sophisticated and successful facility and process for such rehabilitation in the State of Florida.

5. For decades I have publicly sought to end the practice of keeping big cats in captivity. I have attempted to draw international attention to the plight of captive big cats on CNN, Fox, Animal Planet, Discovery, U.S. News & World Report, People Magazine, The Today Show, Good Morning America, Sports

Illustrated, Netflix, Wondery, Dancing with the Stars, all of the local media outlets and many more national and international programs. I am frequently contacted by media around the world when there is a big cat incident in the news. I have been featured in recent years in three documentaries, Hidden Tiger, The Conservation Game, and a BBC production by well-known UK documentary maker Louis Theroux, and I was just filmed for another UK production by well-known UK documentary maker Ross Kemp.

6. I have lectured in Costa Rica, Panama, Mexico and many cities across the U.S. on legislative affairs, and sanctuary standards in Universities, Law Colleges (including Stetson, Texas Lutheran University and University of Miami), and in numerous animal association conferences.

7. Along with my spouse, Howard, our advocacy work includes a broad spectrum of activities. These include:

- a. Convincing venues not to allow cub petting operations or adult cat exhibitors on their grounds. We have convinced the owners of over 200 large shopping malls not to allow cub petting. We have convinced some major corporations like Citigroup, Porsche, Target, PetSmart and numerous smaller venues like restaurants, all of whom had allowed adult tiger exhibition at their locations at some point, not to allow such exhibition in the future.

- b. We have convinced major advertisers like Farmers Insurance, Arby's, and 5-Hour Energy who used big cats in their marketing ads to discontinue such use.
- c. We spend enormous energy in exposing those who mistreat big cats both by publicizing the mistreatment and by reporting potential violations of federal and state laws to the appropriate authorities. As a result, we are known as the people whistle blowers should report potential violations to and have assisted whistle blowers in filing formal complaints with agencies like USDA. We maintain a website 911AnimalAbuse.com to provide a public resource and database of news reports about and USDA violations incurred by exhibitors and owners.
- d. We work with state agencies around the country and with federal agencies to strengthen the regulations that protect big cats. One significant example was working along with other advocates to convince the US Fish & Wildlife Service (USFWS) to rescind what was known as the "generic tiger rule." This 1998 rule exempted tigers of unknown genetic history (i.e., not known to be pure subspecies) from the requirements of the Endangered Species Act. This had resulted in massive overbreeding of tigers. The rescission of this rule in 2016 after

five years of our work and others, including generating over 30,000 comments to USFWS, has already resulted in prosecutions for what since the rescission has become illegal trafficking. Other successes include the 2009 requirement that those in Florida who possess Class I animals must post a \$10,000 bond and the reclassification of a cougar in Florida to Class I, making it illegal to own as a pet in FL.

- e. We work with state and federal governments to change the laws. We have helped change a number of state laws. At the federal level in 2003, we worked with other advocates on the Captive Wildlife Safety Act which passed Congress unanimously and prohibited the interstate sale of big cats as pets. Since 2012, our primary effort has been the Big Cat Public Safety Act. We have been working closely and coordinating with a number of the larger animal welfare groups. We have been recognized as leading advocates for this legislation, devoting significant financial and time resources to the bill. The bill passed the House in December 2020 by more than a two-thirds vote but did not get a vote in the Senate. It is expected to pass the House again this session and is making strong progress in the Senate with 35 cosponsors including four Republicans. The bill would end cub petting and photo ops with big cats and phase out private ownership



by individuals who are not licensed by USDA as exhibitors.

f. To a large extent the success of this advocacy is accomplished by marshalling the grass roots efforts of millions of social media followers to send emails and make phone calls to venues, public comment sites set up by agencies, and legislators. Personal lobbying also plays a role.

8. Our advocacy is not without opposition. Those who desire to practice the private ownership of big cats as well as the private roadside “zoos” that exploit big cats through breeding and cub petting activities all for commercial gain are frequent critics of us, Big Cat Rescue, and our mission.

9. In one highly publicized case, Joe Schriebvogel n/k/a Joe Maldonado-Passage a/k/a Joe Exotic (“Joe Exotic”), the operator of a private roadside zoo and prolific breeder of big cats and purveyor of cub petting services sought to discredit and silence us and our advocacy through years of constant and persistent intimidating and libelous social media attacks and physically during one incident at Big Cat Rescue.

10. When Joe Exotic misappropriated the trademarks and copyrights of Big Cat Rescue in an attempt to tarnish the sanctuary’s goodwill and our reputation by falsely suggesting that Big Cat Rescue was – itself - engaged in commercial cub petting practices, litigation ensued that resulted in a Judgment in

excess of \$1 million being entered against Joe Exotic and his roadside zoo. Actions taken to enforce this Judgment allowed us to succeed in finally shutting down Joe Exotic's "zoo" and big cat breeding mill.

11. Faced with the financial pressure of the ongoing litigation and our successful efforts of exposing of his mistreatment of animals, in 2017 Joe Exotic solicited a "hitman" to murder me. The plot was uncovered, and Joe Exotic was arrested and convicted, not merely for the murder-for-hire plot, but also for numerous violations of federal law related to the killing of and illegal trafficking in big cats.

12. On July 18, 2014, Rebecca Chaiklin - a producer with Royal Goode Productions - telephoned Big Cat Rescue seeking to contact me. In her message, Chaiklin said that she was a feature film director who was doing a feature documentary on the wildlife trade. Chaiklin described the project as a big cat version of the documentary *Blackfish*. Chaiklin expressed a desire to visit Big Cat Rescue and film and interview me.

13. In subsequent telephone calls and finally at a face-to-face meeting, Eric Goode and Rebecca Chaiklin of Royal Goode Productions repeatedly emphasized that the intended goal for the project was to create a single documentary feature film that would be an expose' of the big cat breeding and cub petting trade akin to the documentary feature film entitled *Blackfish*. Eric Goode

touted his credentials in the realm of turtle conservancy and Rebecca Chaiklin touted the involvement on their production team of Fisher Stevens, well known for his involvement in the acclaimed animal welfare documentary *The Cove*, as *bona fides* to induce me to participate in the Royal Goode Productions documentary.

14. Royal Goode first filmed Howard and me on July 23-25, 2014. The next filming occurred April 29-30, 2016. The third filming session occurred on April 3, 2018. In 2019, Royal Goode Productions conducted four additional filming sessions on May 16, October 10 & 17 and December 7. With the exception of the October 17, 2019 filming while Howard and I were lobbying Congress in Washington, D.C., all of the filming occurred at the Big Cat Rescue sanctuary. All told, I estimate that Royal Goode Productions filmed more than 50 hours of footage involving the Howard and me and Big Cat Rescue.

15. On April 30, 2016 and while filming on-site at Big Cat Rescue, Royal Goode Productions presented me with an appearance release in a form drafted by Royal Goode Productions. In reviewing the appearance release, I understood that it concerned a single documentary motion picture project which was consistent with the representations I had previously received. Accordingly, I signed the appearance release.

16. On April 3, 2018 and again while filming on-site at Big Cat Rescue, Royal Goode Productions presented me with another appearance release in a form



drafted by Royal Goode Productions. It was identical to the earlier appearance release except that the proposed title of the single documentary had been changed from "Stolen World" to "currently untitled."

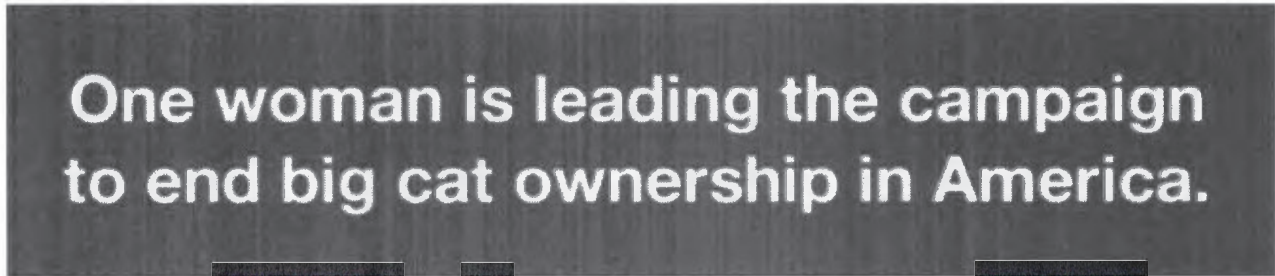
17. The April 30, 2016 and April 3, 2018 appearance releases are hereinafter referred to as the "Appearance Releases".

18. I was paid nothing for signing the Appearance releases nor for participating in the filming by Royal Goode Productions

19. Royal Goode Productions did not provide me with copies of the Appearance Releases that I signed. However, Royal Goode Productions did provide my husband, Howard, with copies of his signed Appearance Releases. I have reviewed his copies and they are identical to the ones that I signed, which is not particularly surprising since these were form appearance releases prepared by Royal Goode Productions and were presented to Howard and me at the same time and place by the same representatives of Royal Goode Productions.

20. In September 2018, Royal Goode Productions shared with Howard and me three videos as examples of its progress on the project. One was a five-minute video titled "Sizzle Reel," another was a thirteen-minute video they referred to as "Rough Carole Scenes," the third was a forty-five-minute video they referred to as "CNN Pilot." The Sizzle Reel and CNN Pilot both involved multiple species and included footage filmed in Africa. While nowhere akin to the quality

of *Blackfish* or *The Cove*, it did appear that Royal Goode Productions was attempting to create an animal welfare-oriented documentary. Even more significant was the “Rough Carole Scenes” video. It clearly portrayed me as the heroine battling the cub petters. It even had a text screen saying:



**One woman is leading the campaign  
to end big cat ownership in America.**

21. Thereafter, Royal Goode Productions advised that its deal with CNN had fallen through. Subsequently they advised that they had a new deal with Netflix.

22. In March 2020, Netflix released a series entitled *Tiger King: Murder, Mayhem, and Madness* (hereinafter “*Tiger King 1*”) the was produced by Royal Goode Productions.

23. *Tiger King 1* was not a *Blackfish*-style documentary exposing the evils of big cat private ownership, breeding and cub petting. Instead, it was a sensationalized and salacious program that focused on Joe Exotic in a reality TV format. *Tiger King 1* wrongly attempted to suggest that Big Cat Rescue abused its animals by keeping them in very small cages, which in fact were feeding enclosures employed for safety reasons while not making

clear that the animals actually reside in expansive enclosures. Also, *Tiger King 1* incorrectly suggests an equivalency between Big Cat Rescue and Joe Exotic's roadside zoo, and more broadly that there is no difference between roadside zoos that exploit and mistreat animals and accredited sanctuaries that rescue and provide excellent lifetime care to the animals. Perhaps most disturbing was the over-arching implication in *Tiger King 1* that I was involved in the disappearance of my first husband in 1997.

24. Following the release of *Tiger King 1*, my husband and I along with the staff at Big Cat Rescue were subjected to a deluge of instances of "hate mail" in social media, memes, texts, e-mails, internet comments and telephone voice mail messages totaling in the tens of thousands. On my personal cell phone alone, I collected over three (3) hours of harassing and threatening voice mails. A compilation of these harassing and threatening communications is available at <https://vimeo.com/407776022> [WARNING: GRAPHIC AND PROFANE CONTENT]. Additional examples of some of the threats and hate mail are attached as composite Ex. A.

25. One unfortunate consequence of the post-*Tiger King 1* barrage of harassing and threatening voice mails is that I had to cease leaving my cell phone on at night for months. This prevented me from receiving calls regarding injured

bobcats needing rescue in the wild. I have no idea as to the number of injured bobcats that may have died as a result.

26. Because of *Tiger King 1*, I believe that millions of its viewers believe me to be a murderer. This damage to my reputation not only causes me personal emotional distress but also has adversely impacted my ability to advocate for big cats.

27. Out of fear that any one of these thousands of people who have made harassing and threatening comments about me and Big Cat Rescue, the sanctuary has had to continue its suspension of its tours to the general public (originally suspended due to the COVID-19 pandemic) because we have no way to be sure that a tour guest is not bent on violence. On the Big Cat Rescue website we have posted the following:

We don't know if we will ever resume doing general public tours again. Even after the virus concerns subside, the betrayal by the liars who produced *Tiger King*, and the lies viewers were told in the series, creates a concern about having visitors we do not know.

<https://bigcatrescue.org/> . The continued suspension of general public tours because of the threats and harassment resulting from *Tiger King 1* has severely harmed our ability to fulfill our mission to educate the public and encourage support for legislative initiatives.



28. Since *Tiger King 1*, I have been publicly ridiculed with the false innuendo that I am a murderer. Of the many examples is a T-Shirt that was sold on-line at Walmart.



29. After the release of *Tiger King 1*, I was again contacted by Rebecca Chaiklin of Royal Goode Productions who wanted to meet and “clear the air.” I presumed that Royal Goode Productions was also going to try to convince me to participate in filming for the *Tiger King 2* sequel. I told Chaiklin: “No. And lose my number.”

30. I never heard from Royal Goode Productions since. At no time was I informed by Royal Goode Productions or Netflix that they intended to use our film footage in *Tiger King 2*.

31. Since that time, I have continued to be publicly critical of the falsehoods and lies of *Tiger King 1* and steadfastly have stated that I would not participate in *Tiger King 2*. Since the Appearance Releases limit the use of our film footage to a single documentary motion picture, I felt some comfort in knowing that - no matter how odious *Tiger King 2* might be - there would not be any of our film footage included.

32. On October 27, 2021, I saw the Netflix "Official Tiger King 2 Promotional Trailer" and was shocked to see that it prominently portrayed me (and my husband) as central figures using the Royal Goode Film Footage.

33. Also, since the Netflix release of its "Official Tiger King 2 Promotional Trailer," we have experienced a marked up-tick in hateful social media and internet comments.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed on: 11/1/2021

  
CAROLE BASKIN