

**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 CHEALSI PUTMAN

I, Chealsi Putman, state as follows:

1. My name is Chealsi Putman and I am a resident of the State of Oklahoma. 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 niece of Joseph Maldonado-Passage f/k/a Joseph Schreibvogel a/k/a Joe Exotic ("my Uncle").

3. In August or early September 2019, I was approached by Eric Goode and Rebecca Chaiklin of Royal Goode Productions LLC regarding a documentary

that they were filming relating to my Uncle. At that time, they sought to interview and film me and also have me provide them with certain photos of and material related to my Uncle. At the time, I agreed. I was interviewed twice, once before my Uncle was arrested and once after. Each time I signed an appearance release form which they provided.

4. While they did not provide me copies of the appearance releases that I had signed, they were in the form attached as Exhibit A, although the proposed title of the picture may have been different.

5. Royal Goode Productions LLC used the photos and the materials I provided along with the footage of me that they filmed as part a film entitled *Tiger King: Murder, Mayhem, and Madness* ("Tiger King 1") which was broadcast on NetFlix beginning in March 2020.

6. In May 2020, I was again contacted by Rebecca Chaiklin of Royal Goode Productions LLC regarding a sequel/second season that they were producing ("Tiger King 2"). Ms. Chaiklin asked to "repurchase" all of the photos and the materials I had provided originally to Royal Goode Productions LLC for Tiger King 1 as well as to participate in filming for Tiger King 2. Ms. Chaiklin told me that I needed to sign a new materials and appearance release with Royal Good Productions LLC because the prior releases that I had signed were only for one project (Tiger King 1) and they could not use them for the second project (Tiger

King 2). She had a colleague send email to me the new materials and appearance release.

7. Thereafter, Eric Goode called and asked if he could come to my house. He said he wanted to chat and possibly film me to “set the record straight.” When he came, we talked first and then I agreed to let him film me, but I said was not sure I was willing to sign the new materials and appearance release I had been sent allowing them to use film of me in Tiger King 2. He said he was not aware of what I had been sent, but after this filming he left with me an appearance release form for Tiger King 2. During this filming, I stated that I believed that Tiger King 1 wrongly portrayed Carole Baskin as having murdered her first husband. It was clear to me that Eric Goode disagreed with my opinion. As a result, I decided not to sign the releases so that no film of me could be used in Tiger King 2.

8. Attached as Exhibit B is a true and correct copy of the appearance release form that I was asked to sign for Tiger King 2.

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

Executed on: Oct. 23, 2021

/s/
CHEALSI PUTMAN

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Executed on: 10/23/2001

Chealsi Putman
CHEALSI PUTMAN