

**PLAINTIFFS' EXHIBIT 16**

To Plaintiffs' Opposition to Defendant Feld  
Entertainment, Inc.'s Motion for Leave to Amend  
Answers to Assert Additional Defense and Rico  
Counterclaim  
Civ. No. 03-2006 (EGS/JMF)

1 BY MR. HIRSCHKOP:

2 Q Did you specifically know a young woman named  
3 Anita Walker?

4 A Yes.

5 Q How did you get to know Anita Walker?

6 A Anita was another private investigator who I  
7 had worked a number of cases with.

8 Q Was she an investigator who worked for Shamus  
9 or Mr. Froemming?

10 A That is correct.

11 Q To your knowledge, was she placed inside of  
12 PETA?

13 MR. PETROSINELLI: Objection, foundation.

14 THE COURT: Overruled.

15 A To the best of my knowledge, she was. ✓

16 BY MR. HIRSCHKOP:

17 Q To the best of your knowledge, did she then  
18 go across country and was placed inside of The  
19 Elephant Alliance?

20 A Yes.

21 Q To the best of your knowledge, did  
22 Mr. Froemming have an operative named Julie Lewis?

1 recordings?

2 A I may have heard a couple recordings in  
3 Mr. Froemming's office.

4 Q Did you and Mr. Froemming ever discuss  
5 whether it was illegal to make recordings without  
6 someone's knowledge in the state of California?

7 A Yes.

8 Q What was Mr. Froemming's position on that?

9 A He indicated that he had spoken with  
10 individuals, and everything that was being done was  
11 done by the law. I was aware of what the law was in  
12 the state of California because I had traveled out  
13 there quite a bit over a period of time, and I was  
14 aware of the fact that it was punishable up to a year  
15 in jail for recording audio or video without the  
16 knowledge of the other party. I was also aware that  
17 there was a fine of I believe it was \$2500.

18 Q Did you counsel Mr. Froemming that what he  
19 was doing with Pat Derby would violate that law?

20 A I indicated to him I did have some concerns  
21 about what was being done. But again, I did not work  
22 with Pat Derby.

1 A Yes.

2 Q Was she placed inside of PAWS?

3 A To the best of my knowledge, yes.

4 Q Did she also get inside of the Elephant  
5 Alliance?

6 A Yes.

7 Q Did Julie Lewis also come to Washington,  
8 D.C., on a number of occasions and try to get inside  
9 of PETA?

10 MR. PETROSINELLI: Object to the foundation  
11 of that.

12 THE COURT: Overruled.

13 A I did not follow Julie Lewis. I'm not sure  
14 what events that she did attend.

15 BY MR. HIRSCHKOP:

16 Q Did you become aware that Julie Lewis had  
17 recording equipment?

18 A Yes.

19 Q Did you become aware that she privately  
20 recorded conversations with Pat Derby?

21 A Yes, I was aware of that.

22 Q Did you actually hear some of those

1 Q When you worked at Shamus the first year and  
2 formed Richlin, did you become aware that the same set  
3 of books were being used for Richlin and Shamus to  
4 make payments?

5 A I had no idea.

6 Q Now, I had asked you before about if you had  
7 heard of bomb threats. Did you ever become aware that  
8 there was an alleged bomb threat phoned in at the  
9 Boston Garden sometime in the '80s when the circus was  
10 there?

11 A I can state that I had read reports of  
12 Mr. Froemming's that indicated that there had been  
13 threats against the circus in the past. As far as  
14 with the bomb threat in the late '80s, I'm not sure  
15 what knowledge I would have of that.

16 Q So you have no knowledge of who might have  
17 made a bomb threat to Boston Garden in the late '80s?

18 A No. I didn't work with the circus industry  
19 back in the late '80s, so I wouldn't have knowledge of  
20 that.

21 Q When the circus traveled, did it travel with  
22 a red and a blue unit?

1 A That's possibly correct. Quite often when I  
2 was out of town, faxes would come into my machine. It  
3 was on 24 hours a day. So anybody could send anything  
4 anywhere to my fax machine.

5 **Q Mr. Froemming tried to place operatives in  
6 Defense of Animals also, did he not?**

7 A It's my belief he did try.

8 **Q He also asked you to place an operative  
9 inside the Fund for Animals, did he not?**

10 A I believe he did state that to me.

11 **Q Now, why put an operative inside the Fund for  
12 Animals? This is a very large New York organization,  
13 isn't it?**

14 A Yes, but the Fund for Animals had elephants  
15 out of the compound in Texas.

16 **Q The Black Beauty Ranch?**

17 A Yes, that is correct.

18 **Q That's a very famous place to keep animals  
19 that have been rejected from other people, is it not,  
20 a sanctuary?**

21 A Yes. I've gone out there myself.

22 **Q It was run by Cleveland Amory. Have you ever**

1 And what was important to find out was what were they  
2 doing that was so different than what the circus  
3 industry was doing.

4 **Q Well, in fact, did you go to Europe as part  
5 of your duties with Mr. Froemming?**

6 A Yes, I did.

7 **Q To observe circuses there?**

8 A Yes, I did.

9 **Q What was the purpose of that trip?**

10 A The purpose of the trip was to gain the  
11 knowledge that the European circuses had and the way  
12 they cared for their animals. I had the opportunity  
13 to observe the elephants uninterrupted for 24 hours a  
14 day, spending time in the same barn where they  
15 actually did -- same enclosure where the elephants  
16 were kept. Had the videotape running constantly.

17 Seeing how the Mahoots, which were known to the people  
18 there, took care of the animals and the animal care  
19 that was received within the circus overall. I spent  
20 a considerable amount of time studying the way that  
21 they cared for animals.

22 **Q Did you see them treat the animals**

1 **read Cleveland Amory's books? He was a well-known  
2 author, wasn't he?**

3 A Yes, I do know Cleveland Amory, and I have  
4 read his book. He passed away too, as you know.

5 **Q Cleveland Amory was reputedly one of the  
6 fathers of the animal rights movement in the United  
7 States; isn't that correct?**

8 A I would state that Cleveland Amory is very  
9 well known throughout the animal rights industry. As  
10 far as with his personal life, I would not get into  
11 that

12 **Q Why put an operative in his organization?  
13 Was he threatening the financial well-being of  
14 Ringling Bros.?**

15 A The Fund for Animals was opposed to the  
16 Ringling Bros. Circus. They had opposed all types of  
17 legislation that was geared toward the Ringling Bros.  
18 Circus. The fact is what we needed to see at the time  
19 was how they were actually caring for their animals.  
20 They had made comments that they do not chain their  
21 elephants, which was not true. They had made several  
22 statements about how they cared for their elephants.

1 **differently there than they do here?**

2 A The animals were rarely chained. They were  
3 kept in a -- what is called an electric fence which  
4 allows the elephants to roam freely among themselves  
5 so they can socialize a bit more. And I brought those  
6 ideas back to the United States to be able to  
7 implement into the circus.

8 **Q Now, I asked you about paying demonstrators,  
9 and you admitted you did. You used to pay 50 to \$75 a  
10 head to demonstrators?**

11 A It is my belief that's the amount that was  
12 paid.

13 **Q And sometimes as much as \$500 to get someone  
14 to coordinate a demonstration?**

15 A I believe that's possible or probable. I'm  
16 not sure that -- I don't remember paying, myself,  
17 anyone \$500.

18 **Q When Mr. Froemming put undercover operatives  
19 in these different animal rights organizations, did  
20 they have any training at all?**

21 A To the best of my knowledge, no.

22 **Q Did they have any training on what kind of**