

PLAINTIFFS' EXHIBIT 1

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)

KENNETH FELD

RINGLING BARNUM
BROS. & BAILEY

THE GREATEST SHOW ON EARTH

CIRCUS

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I. INTRODUCTION

The Long Term Animal Plan Task Force ("Task Force") held seven full day meetings to discuss the various issues concerning animal care and maintaining animals in Ringling Bros., which resulted in the enclosed detailed Plan for consideration by the Board.

It is the position of all of the members of the Task Force that the matter of animal activism is one that is of increasing concern and, based upon increased incidences in the last year involving animals in exhibition, most recently Tyke the elephant in Honolulu, that the activists are increasing their activities to effectuate their ultimate goal of banning the exhibition of animals in entertainment. This position is best illustrated by our knowledge that in one of it's mailings, PeTA has named Ringling Bros. as a direct target of PeTA's agenda. Additionally, while funding for environmentalist groups, such as Greenpeace, has declined, due to the fact that animal activist issues are today's "politically correct" issues, animal activist funding continues to rise substantially.

Accordingly, the Task Force proposes that Ringling Bros. adopt a posture which is exceedingly pro-active in nature and does not merely react or remain silent when occurrences happen. To that end, the enclosed Plan was developed, which contains many components, all of which are pro-active in nature and which require substantial commitment and acceptance by Ringling Bros. and its various Departments.

II. MISSION STATEMENT

The following mission statement was developed. This Mission Statement guided the Task Force throughout its endeavor:

Ensure a positive climate whereby Ringling Bros. and Barnum & Bailey can continue to husband, train and exhibit animals while maintaining public support.

III. OVERVIEW OF THE PLAN

The Long Term Animal Plan requires considerable cooperation among the various Departments of Ringling Bros. Specific tasks for various Departments are set forth in this Plan. The successful implementation and achievement of the goals of this Plan requires the creation of a new Department, the Animal Issues Department, to carry out the day-to-day implementation of the Plan and to ensure the daily support of and cooperation among the various Departments. See Organizational Chart at page 30. The Animal Issues Department will also sit in on periodic meetings scheduled by the Long Term Animal Plan Task Force, aka the "HUB." The purpose of these pre-scheduled meetings, occurring approximately every six weeks, will be to evaluate and update the Plan, as needed.

Changes in certain practices at the Unit level are recommended to enable us to accomplish our Mission Statement. A significant step in this regard is the placement on the Units of a recent DVM graduate, who will be under the supervision of Dr. Houck. These recommendations are set forth in detail at page 6.

An aggressive approach to media and public relations is advised through three major campaigns, each of which is driven by a different theme:

- "Leave it to the Pros"

This campaign, executed by the Media Center/Marketing Department through its regular on-going Media campaign, consists of educating our numerous publics on a daily basis specifically about our animal care story.

- "In Your Face, Stop the Lies"

This very aggressive campaign, executed by the Animal Issues Department, is intended to expose and discredit animal activist entities with factual information at every level of consumer, media and legislative awareness. Specific targets of this campaign may include how donations are actually used, the terrorist activities of the activists, their inclusion in Department of Justice and FBI reports, etc.

- "If Not Here, Nowhere on the Planet"

This campaign will be mounted by a third party with whom Ringling Bros. will cooperate to educate the public about the reality of endangered species in the world, their loss of habitat and why Ringling Bros.' captive breeding is essential to the continued existence and propagation of these endangered species.

A deliberate and calculated "courtship" of federal, state and local legislative bodies is suggested. This stepped up approach is vital since the activists are using these bodies to seek passage of laws and regulations which directly or indirectly will accomplish the activists' goals.

Detailed Crisis Management is also addressed in this Plan. This is divided into three components, Long Range Planning, Anticipated Threat System and "911." These three components are overseen by the Animal Issues Department, in conjunction with the HUB, and will enable Ringling Bros. to address anticipated threats, as well as to respond swiftly and appropriately to an actual crisis.

Minimum staffing needs to execute the Plan are set forth, as well.

IV. UNIT OPERATIONS

A. Unit Animal Policy Regulations

The Task Force reviewed the draft Unit Animal Policy Regulations (the "Regulations"), which was previously distributed to the Board. Revisions by the Task Force were made and were approved by the Board.

B. Self-Management

1. Experience Requirements for Animal Care Staff

Establish minimum levels of experience for the different positions in the Unit animal department. These benchmark standards will further solidify our position as the leader in animal care and may be cited if - and, more likely, when - legislatures and agencies seek to devise the same.

2. Animal Department Staff Meetings

The Circus Operations General Management ("COGM") will call monthly meetings of the entire animal department. These meetings are intended to inform the staff about recent animal issues, answer any questions or concerns the staff may have and to provide the "you're doing a great job" reinforcement.

3. Training Program for Animal Care Staff

- a. Dr. Houck will develop and implement a basic animal husbandry educational program with the animal care staff.
- b. A comprehensive video will illustrate to all animal care staff the proper handling of animals, as well as address issues of security and the philosophy and proper image of Ringling Bros.

4. Security

The issue of security was extensively discussed, and it was agreed that given the length of the train, the lack of security at rail yards and the arenas, we are exceedingly vulnerable to trespassing and destructive acts by animal activists. Accordingly, the Task Force recommends that the Unit Manager, who will utilize the Unit Communications Coordinator ("UCC"), referenced in the Unit Animal

Policy Regulations, will be responsible for accomplishing the following tasks:

- a. Ensure that all security measures referenced in the Animal Policy Regulations during loading and unloading of the animals be strictly enforced.
- b. Ensure that all restrictions set forth in the Regulations regarding access to the animal compound and tents be strictly enforced.
- c. Determine that appropriate security is in place for all Public Relations/Media Events involving animals, including hiring qualified temporary security on an as-needed basis for particular events.
- d. Review animal cars and venue layout to improve animal security at these sites.
- e. Coordinate video taping of all activist activities.
- f. Oversee placement and maintenance of security video monitoring, referenced at B. 9 below.

5. Unit Veterinarian

In light of the global expansion of Ringling Bros. and the increasing number of elephants at the Elephant breeding farm, the Task Force recommends that a recent graduate of veterinary school be hired for each Unit who will be selected and trained by and who will report directly to Dr. Houck. This individual will also be responsible for handling the following tasks:

- a. Handling veterinary tasks as assigned by Dr. Houck, thus eliminating, in many instances, the use of local veterinarians.
- b. Overseeing and hosting menageries in each venue that can accommodate the same.
- c. Accompanying the General Manager on all USDA and other authorized inspections. (Dr. Houck also will accompany, if on site.)
- d. Advising on animal care and image issues, as needed.

6. Unit Spokesperson

It is clear that both Units need to have pre-determined spokespersons to tell our story and address animal issues. How and when the spokesperson is used will be determined by the Media Center. The spokesperson must be media-trained on a very intensive level and must be prepared to answer tough questions and issues raised by animal activists, as well as have substantive knowledge regarding the different species and their plight in the wild. Brief knowledge regarding applicable federal and state laws and regulations is also necessary. All of this will provide an awareness and comfort level which will enable the spokespersons to withstand the most intimidating interaction or confrontation with the Press. It is the goal of the Task Force that the Unit Veterinarian will also be trained as a spokesperson to address the medical care, health and well-being of the animals. The presence of a "DVM" ⁽⁰⁵⁾ after the spokesperson's name will accord to the spokesperson a great deal of credibility and objectivity.

7. Animal Compound

A six-foot-high perimeter fence will be erected at each venue which will constitute the "animal compound." This compound will be made secure, regardless of whether it is located inside or outside of the Arena. Banners which set forth educational facts regarding the animals will be hung from the perimeter fence. The animal tents will be erected inside the compound and durable signs will be created which sets forth "DO's and DON'Ts" regarding animal handling, so that animal handlers are constantly reminded of the same. The DO's and DON'Ts signs will be erected inside each animal tent. Strict limitations regarding access to the tents and the compound itself are addressed in the Animal Policy Regulations.

8. Unannounced Self-Inspections

Unannounced, self-inspections of the animal compound will be conducted to further ensure compliance with all requisite government regulations under the Animal Welfare Act. The suggested individual to conduct these inspections will be made to the Board at the time the Plan is presented.

9. Security Video Monitoring

All activities of animal activists will be videotaped, as directed by the Unit Manager. The purpose for this action is several fold:

- a. Taping unlawful action by activists will permit us to seek prosecution;
- b. Copies will be turned over to local law enforcement and, if appropriate, to the FBI;
- c. Taping may dissuade activist activity if they know their actions are being memorialized;
- d. Taping enables us to physically identify activists, which will be used in Crisis Management, discussed at page 15 below; and,
- e. Selected clips may be distributed to the media on a case-by-case basis in accordance with the second campaign of the Media Plan, addressed below at pages 12 and 13.

10. Cleaning and Watering

A stock car cleaning and watering schedule shall be built into every routing and this will be worked out with the Transportation Department. These are not to be made public, nor are they for media coverage, but to further ensure the high standard of care given to our animals.

V. MEDIA

The Media portion of the Plan is divided into three separate and coordinated campaigns, each of which is characterized by a distinct theme. The three campaigns are as follows:

- A. "Leave it to the Pros"
- B. "In Your Face, Stop the Lies"
- C. "If Not Here, Nowhere on the Planet"

- A. "Leave it to the Pros"

This campaign, executed by the Media Center/Marketing Department through its regular on-going media campaign, consists of educating our numerous publics on a daily basis specifically about our animal care story. This will be accomplished through the following mediums:

- 1. Print
 - a. Place feature stories in local and national magazines, newspapers and other publications.
 - b. Prepare and distribute matte mailings.
 - c. Distribute media briefing book which solely addresses animal care with a cover letter to each local market one month in advance of a particular engagement. Briefing book to include two VHS tapes: one tape to be a compilation of news clips documenting the state of the wild and its lost habitats, the source of which will be third party, existing materials, which we will obtain permission to reproduce; the other VHS tape will tell our story about how we take care of our animals. Distribution of media briefing book and VHS tapes to be followed up in select markets with direct meeting with local editorial boards.
 - d. Select one local newspaper in each market to conduct an "exclusive" back stage tour of the animal compound and tell our positive animal story.

- e. Place print stories with childrens' publications, animal in content, using such vehicles as child performers (ie. Whitney Boger).

2. Television

- a. Distribute media briefing book which solely addresses animal care with a cover letter to each local market one month in advance of a particular engagement. Briefing book to include two VHS tapes: one tape to be a compilation of news clips documenting the state of the wild and its lost habitats, the source of which will be third party, existing materials, which we will obtain permission to reproduce; the other VHS tape will tell our story about how we take care of our animals. Distribution of media briefing book and VHS tapes to be followed up in select markets with direct meeting with local television news director, etc.
- b. Pitch animal stories, including open training sessions.
- c. Produce animal specific VNRs when appropriate.
- d. Produce animal welfare electronic press kit ("EPK").
- e. Produce satellite media tour of both Units and Elephant Farm.
- f. Select one local station in each market to conduct an "exclusive" backstage tour of animal compound and tell our positive animal story.
- g. Use network feed services and consortiums to disseminate our story.

3. Radio

Book Unit Veterinarian in every market on radio talk shows.

4. Direct Marketing

- a. Direct Mail - Utilizing our extensive consumer database, a positive direct mail piece will be sent throughout the country heralding our 125th year, conveying our animal story and explaining the impending threat to the continued presence of

animals in Ringling Bros. because of animal activist actions. This letter will be the first step in enlisting our grass root supporters in the event we ever need their assistance later, such as in letter writing campaigns to legislators, etc.

- b. Speaker's Bureau - Identify corporate individuals to speak at various clubs such as Kiwanis, Rotary, etc. to educate businesses, civic leaders.
- c. On-Site Handouts - Revise handouts to be given to each Ringling Bros. patron emphasizing our "Leave it to the Pros" message with a "clear and present danger" profile about the animal activists' agenda, combining this information about the loss of habitat in the wild.

5. Videos

- a. Media Briefing Book Videos - Referenced above, one of these videos will tell our "Leave it to the Pros" story, discuss the educational value of animals in Ringling Bros. and respond subtly to animal activists' allegations. The second video, which includes brief news clips and documentary excerpts, will educate the viewer about the true state of the wild.
- b. Legislative Video - Similar to the media video, these videos will be revised to target each level to which they are directed, namely federal, state or local.
- c. Video for the Classroom - Geared to children, this video will be disseminated through various channels including:
 - to each CircusWorks attendee for viewing in his/her respective classrooms/schools;
 - to each participating teacher in school shows;
 - as part of our educational services distribution when materials are requested; and,
 - on Cable in the Classroom.
- d. Family Video - This half hour program, hosted by Joan Embry, or someone of equal stature and credibility, would

focus on our animal care and animal husbandry practices. The program would also feature the Florida Breeding Farm and subtly address issues raised by activists. It is anticipated that this video would be produced only after getting a commitment for airing by the Discovery Channel, the Learning Channel or on other programming.

- e. Children's Video - Using the Video for the Classroom as a starting point, a half hour program would be produced to take a lighter look at Ringling Bros. animals, with an eye toward placement on Nickelodeon or the Disney Channel. This video can also be sold at arenas and may be hosted by someone like Jack Hanna and may include child performers who perform with animals, etc.

6. Electronic Forums

Become a provider on a computer network such as America Online, Prodigy or CompuServe as an additional outlet for our various publics to access.

B. "In Your Face, Stop the Lies"

This very aggressive campaign is intended to expose and discredit animal activist entities with factual information at every level of consumer, media and legislative awareness. Specific targets of this campaign may include how donations are actually used, the terrorist activities of the activists, their inclusion in Department of Justice and FBI reports, etc. This campaign will be overseen and executed by the Animal Issues Department and will include the following action:

1. Identify third party experts who can be deployed to speak out against activists across the United States.
2. Place stories in all media (print, t.v., radio) with factual, negative information about activists.
3. Organize grass roots campaign to respond vehemently against inaccurate, biased reporting so that radio, t.v. and print are called to task immediately in a large scale manner for such reporting. Regardless of which medium in which the piece appears, our grass roots supporters will respond through all mediums.

4. Rapid Deployment Force ("RDF") - Immediately upon learning about negative stories about Ringling Bros., the Animal Issues Department will put into place the RDF. The Animal Issues Department will directly contact the editor/news director demanding an immediate meeting between the Head of the Animal Issues Department and the editor or news director. Armed with videos, literature and other information, the Animal Issues Department Head will demand a retraction or equal time and will work in concert with the grass roots campaign outlined in paragraph 3 above. If the editor/news director refuses the request, Legal will be informed to determine what recourses exist.
5. RDF Non-Ringling in content - This addresses instances in which the biased reporting is non-Ringling in content, but is indirectly injurious to us. When appropriate, submit video or other materials about the latest vengeful and/or unlawful tactics of the animal activists so the media understands the lack of credibility of these entities.
6. "Friends of Ringling" - A small network of individuals who hold close ties to Ringling Bros. are identified in each venue. These Friends will be "our eyes and ears" and will report to the Animal Issues Department on a monthly basis regarding local animal issues, activist actions, etc. These Friends will provide a checks and balance to our grass roots supporters and our legislative monitoring system.
7. Work closely with friendly, reputable industries, such as the Farm Animal Welfare Coalition, to share intelligence about animal activists.
8. Formulate a plan to discredit the IRS Section 501(C)(3) status of PeTA, PAWS, etc. and how to have PeTA de-listed from the Combined Federal Campaign and the United Way, where PeTA is currently listed.
9. When receiving negative, school children letters, Animal Issues Department activates intensive campaign to the school itself, principal and Board of Education demanding investigation, since such letters typically are due to an activist teacher or to a PeTA spokesperson at the school. Our specific response, such as demanding that we have a speaker address the children, will depend upon the facts of each case.

10. Enlist a third party to do an executive summary of positive texts, such as Kiley-Worthington, and texts attacking the animal activists, such as Daniel Oliver, Animal Rights: The Inhumane Crusade, and seek to have these texts distributed.

C. "If Not Here, Nowhere on the Planet"

This campaign will be mounted by a third party with whom Ringling Bros. will cooperate to educate the public about the reality of endangered species in the world, their loss of habitat and why Ringling Bros.' captive breeding is essential to the continued existence and propagation of these endangered species. The public education will be accomplished through the following tools:

1. Enlist celebrities to do PSAs about the dwindling wild and the importance of having animals in captivity. This will help counter the many celebrities that the animal activists have identified to champion their cause.
2. Conduct and thoroughly publicize a third party scientific symposium held in one or two major cities such as New York, Washington or Los Angeles, addressing the thrust of this third campaign.
3. Enlist and bring together publications, such as "Field and Stream," and entities, such as The Diversity Foundation, as additional outlets to communicate this message.
4. Place articles in various publications.
5. Place stories on various broadcast outlets.
6. Place advertisements in strategic media outlets.

VI. CRISIS MANAGEMENT

Crisis Management has three components:

- A. Long Range Planning
- B. Anticipated Threat System ("ATS")
- C. "911"

A. Long Range Planning

This component consists of an information system that tracks on a long term basis significant data on an engagement-by-engagement basis to facilitate the analysis of the second component, namely the Anticipated Threat System. Included in the information system to be tracked will be the following subjects:

1. Determine local animal issues and activities.
2. Compile history regarding activists' activity and media coverage of the same.
3. Identify state and local entities holding inspection and/or animal seizure powers.
4. Identify which cities have demonstration permit requirements and noise level regulations.
5. Develop grass roots network.
6. Identify (with photographs, if available) and profile local animal activists.
7. Compile important local phone numbers such as arena management, local publicist, RMD, local activists hotline to facilitate ATS, local telephone numbers of Bureau of Alcohol, Tobacco and Firearms ("BATF") and FBI.
8. Determine security measures for riots and bomb/fire plans in each arena.

9. Compile detailed floor plans including exits, entrances, emergency exits, etc. of arenas.

The above information will be set forth in a "by engagement" document and will be compiled by the Animal Issues Department with the assistance of the Media Center, Government Relations and Legal.

B. Anticipated Threat System ("ATS")

Taking advantage of the information database compiled during the Long Range Planning, the ATS analysis will be made by the HUB, known here as the Crisis Management Team, for upcoming engagements in order to avert last minute crises and to accomplish a pro-active, preventative result to an anticipated threat. The ATS is initiated by the Animal Issues Department approximately two weeks prior to each engagement and involves three stages:

1. Pre-Engagement Analysis
 - a. Media Center ("MC") talks to RMD and local publicist to identify any threats and problems using information database compiled under Long Range Planning.
 - b. Review prior year's activist activities.
 - c. Listen to local activist hotlines.
 - d. Consult outside sources regarding possible, hostile situations.
 - e. Set down schedule of all Public Relations/Media events involving animals and check for holes in security, etc.
 - f. Check arena policies to determine any changes in arena policies regarding demonstrations, security, etc.
 - g. Check local permit request to see if activists have requested demonstration permits, etc.
 - h. Review arena and compound/tent layout.
 - i. Ensure that local veterinarian's name and phone number are posted on Company bulletin board.

- j. Ensure that sufficient means of communication between animal sites and management is in place.
- 2. Evaluation of Anticipated Threat
Is there a potential threat to the safety of people or animals?
- 3. Institute Measures to Stop Anticipated Threat
 - a. Conference call between Crisis Management Team to determine appropriate course of action, which will be conveyed as follows: MC to contact RMD; Richard Froemming to contact Unit.
 - b. Action components to quash threat include determining whether additional security and/or escorts are necessary, ensuring that spokesperson is in place and determining whether Corporate presence, such as MC personnel, is required on site.

C. 911

The third component of Crisis Management is "911." As its title illustrates, this component is in place to be put into action when an actual crisis or emergency has occurred. 911 may consist of the following scenarios:

- 1. Animal Escape
- 2. Animal Injury/Death
- 3. Patron Injury/Death from Animal
- 4. Staff Injury/Death from Animal
- 5. Actual Breach of Security of Tent/Compound/Arena
- 6. Arson/Bomb Threat or Occurrence
- 7. Train Derailment
- 8. Life Threat or Personal Attack to Staff or Animals
- 9. Internal Leaks

10. Third Party Animal Crisis

In the event any of the above occurs, the Crisis Management Team shall immediately convene by telephone with as many members as possible, including Allen Bloom, the Unit General Manager and, if appropriate, Dr. Houck. The General Manager shall have the names and telephone numbers of the Crisis Management Team in the event the General Manager is the first to know about any of the above occurrences.

The below listed Specific Response Plans for each of the above occurrences shall be reviewed by telephone and tailored to the specific occurrence. Each Team member, Allen Bloom, Dr. Houck and each General Manager shall have a copy of the Specific Response Plans.

Specific Response Plans ("SRP")

1. Animal Escape
 - a. Confirm that Unit Containment Plan has been followed (the Unit Containment Plan to be prepared).
 - b. Address media concerns through spokesperson.
 - c. Determine whether corporate presence is required.
 - d. Notify other Unit about the escape.
 - e. Make immediate review of circumstances to correct same.
2. Animal Injury/Death
 - a. General Manager first calls Dr. Houck while Unit DVM attends to animal (if GM not available, then Manager, Performance Director, Assistant Performance Director, Stablemaster makes call).
 - b. Determine appropriate treatment locale for animal.
 - c. Determine whether Corporate presence is required on one or both Units.
 - d. Notify other Unit about animal injury/death.

- e. Address Media concerns through Unit DVM and Corporate spokesperson, if on-site, or designee if not available, and Dr. Houck, whether on-site or otherwise.
 - f. Review circumstances and take appropriate action, if applicable.
 - g. Confirm that animal removal plan of Dr. Houck has been followed, and Media Center determines whether press release is appropriate.
3. Patron Injury/Death from Animal
- a. Ensure on-site medics have attended to patron.
 - b. Call emergency 911, if appropriate.
 - c. Isolate injury site.
 - d. Two Corporate spokespersons to be dispatched immediately; one to site and one to hospital.
 - e. General Manager to speak in concert with Corporate spokesperson.
 - f. Notify other Unit about the patron injury/death.
 - g. Corporate Spokesperson to be dispatched to other Unit.
 - h. Corporate to issue press release.
 - i. Address employees at each site (Red, Blue, Vienna through Kenneth Feld ("KJF") and COGM) as soon as possible, apprising each site of the situation to maintain employee loyalty and confidence.
4. Staff Injury/Death from Animal
- a. Ensure on-site medics have attended to staff person.
 - b. Call emergency 911, if appropriate.
 - c. Isolate injury site.

- d. Two Corporate spokespersons to be dispatched; one to site and one to hospital.
 - e. General Manager to speak in concert with Corporate spokesperson.
 - f. Notify other Unit about the staff injury/death.
 - g. Corporate Spokesperson to be dispatched to other Unit.
 - h. Corporate to issue press release.
 - i. Address employees at each site (Red, Blue, Vienna through KJF and COGM) as soon as possible, apprising each site of the situation to maintain employee loyalty and confidence.
5. Actual Breach of Security to Arena/Compound/Tent
- a. Immediately contact building security to remove individual(s).
 - b. Request arrest when:
 - * there is a danger to person/property,
 - * there is a failure to depart from animal compound/arena when requested,
 - * there is a disruption to the performance,
 - * there is a failure to cease other disrupting activities when requested.
 - c. Address employees at each site (Red, Blue, Vienna through KJF and COGM) as soon as possible, apprising each site of the situation to maintain employee loyalty and confidence.

Note: It is acknowledged that the right to lawful picketing in certain locales will not be abridged, and we will not automatically request arrest simply because people are protesting.

6. Arson/Bomb Threat or Occurrence
- a. Call Bureau of Alcohol Tobacco and Firearms ("BATF") and FBI (Note: if damage has already occurred, and it is \$10,000 or greater, FBI will immediately dispatch due to Federal law).
 - b. Notify head of building security.

- c. Call local police.
- d. General Manager prepares confidential report to COGM memorializing details of phone call to above names and times of phone calls.
- e. Determine whether to reveal threat to media.
- f. Notify other Unit about the threat or occurrence.
- g. Address employees at each site (Red, Blue, Vienna through KJF and COGM) as soon as possible, apprising each site of the situation to maintain employee loyalty and confidence.

7. Derailment

- a. Isolate site.
- b. Address injuries to humans/animals.
- c. Call emergency care, if appropriate.
- d. Corporate spokesperson(s) to be dispatched immediately; one to site, one to hospital, if applicable, and one to other Unit.
- e. Address employees at each site (Red, Blue, Vienna through KJF and COGM) as soon as possible, apprising each site of the situation to maintain employee loyalty and confidence.

8. Life Threat or Personal Attack to Staff or Animals

- a. Call FBI if threat is by telephone or mail.
- b. Notify local police.
- c. Preserve phone message/writing and turn over to FBI as soon as possible.
- d. Address employees at each site (Red, Blue, Vienna through KJF and COGM) as soon as possible, apprising each site of the situation to maintain employee loyalty and confidence, if appropriate.

9. Internal Leaks

- a. Assess substance of charges.
- b. Determine whether a press conference is appropriate.
- c. Corporate spokesperson to each Unit.
- d. Address employees at each site (Red, Blue, Vienna through KJF and COGM) as soon as possible, apprising each site of the situation to maintain employee loyalty and confidence.

10. Third Party Animal Crisis (i.e., Tyke)

- a. Determine on a case-by-case basis whether Ringling Bros. wants to address the crisis vs. respond when questions occur.
- b. Brief Unit Spokesperson as to Corporate's position regarding the crisis so that the Unit knows appropriate response.
- c. Determine whether a press release is appropriate.

VII. LEGISLATIVE

Legislative matters must be addressed at three levels: federal, state and local. Each of these levels poses a threat to Ringling Bros., and the impact of negative legislative or regulatory activity can be devastating.

A. Federal

The following are examples of pending bills which illustrate the sweeping impact federal action can have on Ringling Bros.:

1. The reauthorization of the Farm Bill - under the auspices of the Animal Welfare Act, which Act governs our ownership, movement and handling of animals.
2. Reauthorization of the Endangered Species Act - this Act addresses endangered and threatened species and is a perfect vehicle for "anti" activity.
3. Humane Transport and Slaughter Act - this Act mandates care, handling, maintenance of domestic animals, and is also a prime vehicle for "anti" activity.

Action:

1. Closely monitor all bills and regulatory action.
2. Attend all hearings relating to bills.
3. Maintain close ties with the Animal Welfare Caucus (Members of Congress who have a positive interest in animal issues and who provide to us a positive voting block).
4. Maintain a pro-active, working relationship with Hill members/staff to address all issues of concern to Ringling Bros., the goal of which is to make them knowledgeable about Ringling Bros. and to engender goodwill from them toward Ringling Bros. Accomplish the same through the following:
 - a. Meet one-on-one with all key members/staff on House and Senate committees with jurisdiction over bills/subject matter of concern with detailed, updated legislative briefing books with videos (briefing books and videos discussed in Media Section above at pages 9 and 11).

- b. Hold scheduled Congressional breakfasts two to four times a year with KJF speaking.
 - c. Conduct full fledged behind-the-scenes tours yearly with key Congressional staff and Dr. Houck.
 - d. Host full reception for members/staff with food, programs, etc. when Ringling Bros. is in Washington, D.C.
 - e. Conduct special events to be coordinated between Media Center and Government Relations (ie. "Tribute to Gunther" held in Longworth building several years ago).
 - f. Host Congressional spouses luncheon and tour for conveying historical significance of Ringling Bros.
5. In the event oral testimony must be presented, work with Legal to determine who testifies and meets with members/staff one-on-one in the company of Government Relations Department.
 6. In the event of hostile legislative/regulatory activity, Government Relations Department works with the Media Center to activate nationwide grass roots support to voice concerns to legislative/regulatory bodies and media.
 7. Share legislative intelligence with friendly, reputable industries, as these industries may result in a coalition force, if appropriate (ie. our alliance with Farm Animal Welfare Coalition resulted in the specific inclusion of circuses in the Federal Break-In Bill).

B. State

Action:

1. Maintain state computer databases of proposed state legislative and regulatory action. Advise that, given volume of action and low cost of database to monitor, in-house monitoring and one outside monitoring source be maintained, which outside source is reviewed by Government Relations.
2. Identify and maintain local lobbyists in key states to address issues and work closely with Government Relations Department, which Department educates local lobbyists and accompanies locals to meet with state members/staff.

3. Distribute legislative briefing books with videos to state legislators to educate them regarding Ringling Bros. generally, our animals and the economic impact of our presence in their state (briefing books and videos discussed in media section above at pages 9 and 11.
4. In the event oral testimony must be presented, work with Legal to determine who testifies and meets one-on-one in the company of the Government Relations Department and local lobbyist.
5. In the event of hostile legislative/regulatory activity, Government Relations Department works with the Media Center to activate state-wide grass roots support to voice concerns to legislative/regulatory bodies and local media.
6. Hold legislative receptions in every state's capitol.
7. Attend annual meeting(s) of the National Association of State Legislators, which provides a unique opportunity to address legislative members of every state in one locale. Seek to get on the agenda to make a presentation regarding Ringling Bros. and also host a booth. (Similar action with the National Governors' Association should also occur.)

C. Local

This level poses particular danger and exposes our vulnerability to the greatest degree because there is no database to monitor this level.

Action:

1. Cultivate personal relationships on a city-by-city basis with every local governmental body to champion our cause.
2. Distribute legislative briefing books with videos to these locals to educate them regarding Ringling Bros. generally, our animals and the local economic impact of our presence (briefing books discussed in media section above at pages 9 and 11).
3. Enlist, through the Media Center, several members of the grass roots public to monitor local bodies for potential activity.
4. In the event of hostile legislative/regulatory activity, Government Relations Department works with the Media Center to activate local

grass roots support to voice concerns to local bodies and local media.

5. In the event oral testimony must be presented, work with Legal to determine who testifies and meets one-on-one in the company of the Government Relations Department and local lobbyist.
6. Determine which localities should have PR/Media events with local government entities.
7. Attend annual meeting(s) of the Council of Mayors and the Association of County Commissioners.

VIII. LEGAL

CITES

This international treaty governing the import and export of certain species is of direct concern to Ringling Bros. Created to protect and conserve the world's species, this treaty has been used by activists and "protectionist" organizations to advance their agendas. Therefore, CITES activities must be closely monitored.

Action:

1. Attend all Conferences of the Parties, held every two years.
2. Monitor activities of Party countries and the Animal Committee to influence Party actions.
3. Establish and maintain relationships with CITES Management Authorities within those countries in which we will be performing.
4. Target specific issues, like F2, to influence their favorable resolution.

IX. STAFFING NEEDS

A. HUB

The HUB consists of individuals who represent the following areas:

- one representative - COGM
- one representative - Legal Department
- one representative - Corporate Communications
- one representative - National Public Relations
- one representative - National Media Relations
- one representative - Local Media Relations
- one representative - Animal Issues Department
- one representative - National Animal Issues

The HUB will conduct periodic meetings, approximately every six weeks, to monitor the implementation of the Plan. The HUB will also implement its Crisis Management responsibilities, which have been discussed above. No additional staffing is required for the HUB.

B. Animal Issues Department

This Department will be based at Corporate Headquarters and will report directly to the Board. It is the Task Force's recommendation that this Department must, at the minimum, consist of a Department Head and two support staff. The Department will oversee the daily workings of the Plan and will ensure the continued cooperation and communication among the Departments.

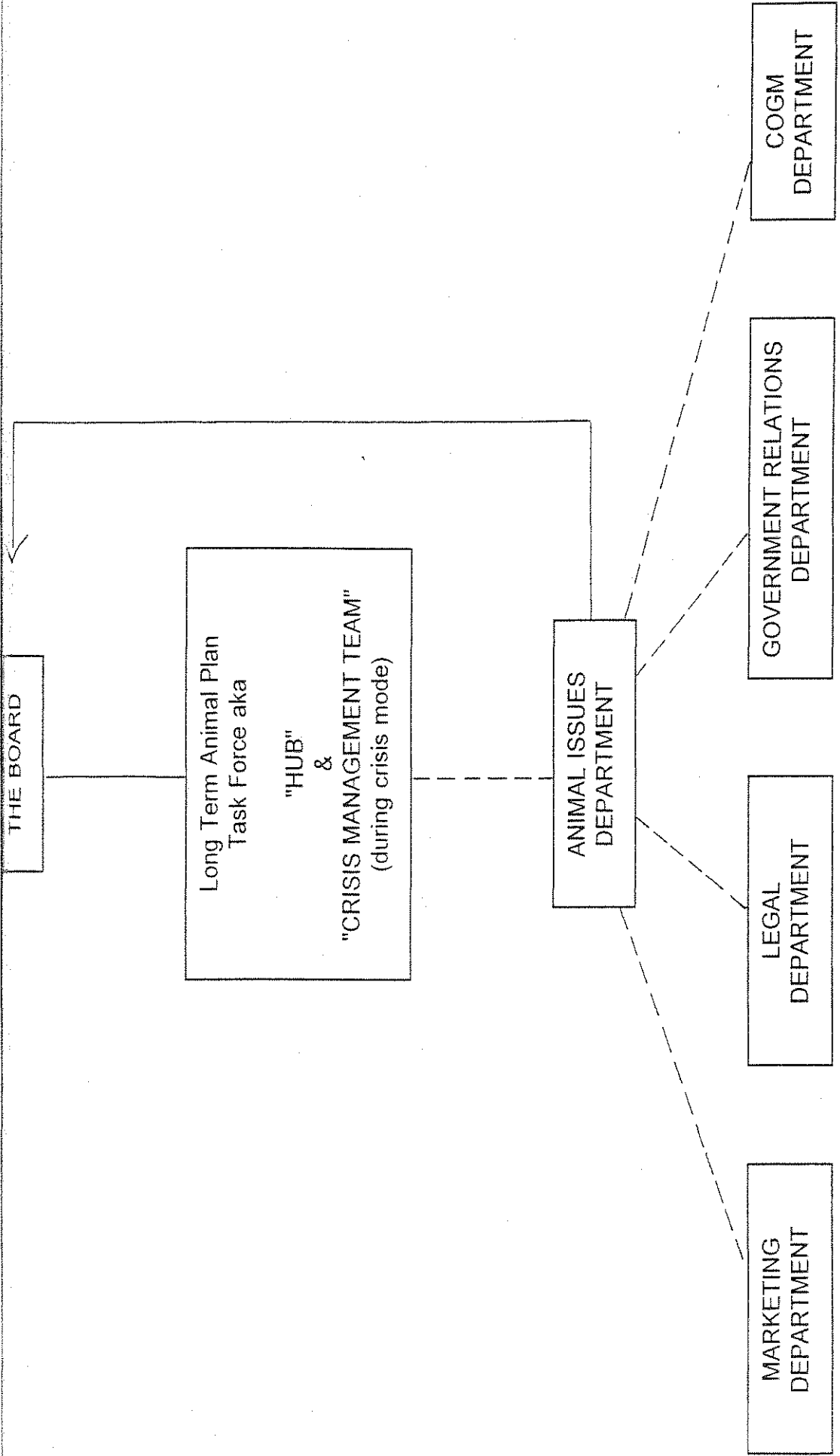
The Department Head must be exceedingly well spoken, media savvy and be prepared to address issues aggressively and travel when necessary. The numerous tasks of this Department have been addressed throughout this Plan and may be summarized as follows:

1. Generate daily reports which consist of all news pieces regarding animal activists and exotic animals generally and all pieces concerning Ringling Bros. animals, a copy of which report will be distributed to a representative of COGM, Media Center, Legal and Government Relations.
2. Carry out the "In Your Face, Stop the Lies" campaign, set forth at pages 12 through 14 above.
3. Meet with editorial boards and television news directors, as discussed above at page 13.

4. Attend animal department Staff meetings, discussed above at page 5.
5. Work with third party to coordinate "If Not Here, Nowhere on the Planet" campaign.
6. Oversee creation of legislative and media briefing books.
7. Consult with Media Center regarding creation of all animal-related communication materials.
8. Develop and maintain animal industry communications network.
9. Compile information for Long Range Planning component of Crisis Management, and ensure that all three components of Crisis Management are being implemented.

C. Unit Veterinarian

The job description of this position has been outlined above at page 6. Research indicates that we would be able to hire a veterinary school graduate for approximately \$25,000 a year.



LONG TERM ANIMAL WELFARE PLAN ORGANIZATIONAL CHART