

PLAINTIFFS' EXHIBIT 31

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)

C O N F I D E N T I A L

A N I M A L A C T I V I S T A C T I V I T I E S
W I T H R E L A T E D M A T E R I A L T O S A M E

M A R C H 7, 1 9 9 4

ITEMS COVERED

TORONTO

GARDEN BROTHERS PERFORMANCE SKY DOME
DEMONSTRATORS - ON SKY DOME PROPERTY
REVIEW OF PERFORMANCE WITH ATTENDANCE

RED UNIT

CHARLOTTE NORTH CAROLINA
ANIMAL WALK - PPF PRESENCE
OPENING NIGHT PPF DEMONSTRATION
PPF LETTER TO THE EDITOR REF ACTIVISTS

BLUE UNIT

R. FROEMMING VISIT TO SAME IN NORFOLK
ANIMAL WALK NORFOLK - TRAIN SPOTTING
ELEPHANTS WITH A HOT SHOT FOR MANAGE

LAMBERT

INFORMATION ON HER CURRENT ACTIVITIES
1000 COPIES MADE UP BY LAMBERT COVERING
HER ARTICLE ANIMAL VOICE MAGAZINE CIRCUS

OHIO

UPDATE ON COLUMBUS OHIO LEGISLATION
PLUS RELATED ITEMS FOR RED UNIT ARRIVAL

FEI 38273

BLUE UNIT - NORFORK - CONTINUED

ANIMAL WALK - LEAD ELEPHANT SIAM - STIFF LEGS
PATTI SUGGESTS TO BUCKLES PUT CALCUTTA FRONT
NOPE - BUCKLES TELLS - (BOB THE SLOB) - KEEP
SIAM MOVING - WELL SHE CAN ONLY GO SO FAST **

ALSO DURING SHOW PRIOR TO ENTRANCE TO MANAGE
BUCKLES GIVING SIAM A HOT SHOT - JUST GREAT *
TRYING TO GET HER MOVING INTO RING - FASTER *

REDACTED

REDACTED

FEI 38277

REPORT DATE - MARCH 7, 1994

BLUE UNIT - NORFOLK - PATRICIA - CONTINUED

8. BOB GAVE HER SOME STATIC IN HAMPTON WENT TO DAVE - MIKE PREPARED TO FIRE HIM MIKE RIGHT ON TOP CONCERNED OVER USE OF PROFANITY TOWARDS PATTI - HOWEVER BOB IS NOW DAY WATCH BARN MAN CAN'T UNDERSTAND WHY WILLING TO FIRE BOB * BUT AFTER BEATING RADAR GAVE TO JUNO HE WASN'T FIRED - AND IS STILL NIGHT WATCHMAN - AS WELL AS TRAIN OVERLAND

SPEAKING OF JUNO INCIDENT - RICHMOND

R. FROEMMING RECEIVED A MESSAGE FROM MARY REED - WOULD LIKE TO SEE ME - NEXT TIME I'M WANDERING AROUND TUESDAY MARCH 1 STOP IN TO SEE HER - MARY GETS RIGHT TO THE POINT - CONCERN ABOUT JUNO - WHEN SHE VISITED THE BLUE UNIT WITH CORPORATE FIRST THOUGHT - APPEARANCE WAS AWFUL - KNEW THAT THIS WAS A BEATING - STATED THAT A LOT OF PEOPLE WITH HER CHOOSE TO IGNORE IT - WERE EMBARRASSED - BUT SHE WAS EXTREMELY UPSET ACTUALLY COUNTED THE PUNCTURE WOUNDS - TWENTY TWO (22) AND WANTED TO KNOW WHY - THE BULL HOOKS WERE SO SHARP - HMMMM SAYS THAT SHE SENDS OUT A LOT OF ANIMAL WELFARE INFORMATION BUT NEEDED TO KNOW THAT WE WERE ADDRESSING THIS PROBLEM ***

FEI 38280

REPORT DATE - MARCH 7, 1994