

EXHIBIT 3

**Plaintiffs' Reply in Support of Their Motion
to Compel Compliance with a Third Party
Subpoena Served on People for the Ethical
Treatment of Animals
Civ. No. 03-2006 (EGS/JMF)**

Richlin Consultants

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AUGUST 31, 1993

CHUCK SMITH
RINGLING BROTHERS
8607 WESTWOOD CENTER DRIVE
VIENNA, VIRGINIA 22182

L204452/L220181
Plaintiff's Exhibit
784

DEAR MR. SMITH,

ENCLOSED PLEASE FIND COPIES OF MY CURRENT BILLING, WITH A BREAKDOWN AS TO SAME WITH THE ORIGINAL HAVING ALREADY BEEN SENT ON THIS DATE TO MR. DUGAN, WITHOUT THE BREAKDOWN SHEET REFERENCE EXPENSES.

I HAVE PROVIDED A COPY OF THE BREAKDOWN OF THESE CHARGES, WHICH HAVE BEEN ITEMIZED ON A WEEKLY BASIS PER INVOICE, WHICH COVERS THE BILLING PERIOD OF 5-3-93 THROUGH 7-11-93.

IF YOU WOULD LIKE ME TO SUMMARIZE THE BILLING FROM 7-12-93 TO THE PRESENT, WHICH I HAVE BEEN DOING ON A WEEKLY BASIS, PLEASE LET ME KNOW AND I WILL PROVIDE A DETAILED LISTING OF SAME.

I HAVE BEEN TRYING TO HAVE A MEETING SINCE THE FIRST PART OF JULY TO DISCUSS THESE PROJECTS, AND HAVE BEEN PUTTING MY INTENTIONS FOR SAME, ALONG WITH THE DEVELOPMENT COSTS DURING THE START UP, IN A WEEKLY LETTER, IN ADDITION TO WEEKLY UPDATES AS TO THE PROGRESS BEING OBTAINED.

I AM AWARE THAT I AM STEPPING ON TOES BUT, QUITE FRANKLY, I FEEL ONE OF THE REASONS THAT THE ACTIVISTS HAVE NOT BEEN AS EFFECTIVE AGAINST US THIS YEAR, IS DUE DIRECTLY TO MY AGGRESSIVE INVOLVEMENT, BOTH IN MY DEALINGS WITH EACH UNIT, AS WELL AS DIRECTING THE QOVERT ACTIVITIES.

MR. BLOOMS INSTRUCTIONS FOR ME TO COORDINATE MY ACTIVITIES WITH RODNEY HUEY, PER OUR MEETING ON JULY 2, ARE A JOKE.

I HAVE REPEATEDLY BOTH CALLED AND WRITTEN MR. HUEY REQUESTING MEETINGS TO ENSURE THAT MY PROJECTS AND ACTIVITIES WORK INTO THE OVERALL PROGRAM WITHIN RINGLING IN ORDER TO MAXIMIZE THE EFFECTIVENESS OF SAME.

GUESS WHAT ? - SURPRISE - NO MEETINGS OR INPUT RECEIVED AS OF THIS DATE.

SMITH-PETA 0819

SMITH 98-17617
13-1586

00433

PRODUCED PURSUANT TO PROTECTIVE
ORDER: CONFIDENTIAL, SUBJECT TO A CLAIM
OF PRIVILEGE

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THINK BACK TO PREVIOUS STATEMENTS WHEN THE ACTIVISTS WERE BEING TAKEN LIGHTLY - WITH THE END RESULT BEING A BAN AGAINST THE CIRCUS IN TORONTO.

THE ACTIVISTS HAVE NOT STOPPED THEIR ACTIVITIES, WHICH IS EVIDENT FROM THE ONGOING PROPOSED BANS IN BOTH BOCA RATON AND ALSO ROYAL PALM BEACH, FLORIDA - RINGLINGS HOME STATE - AS WELL AS THE UPCOMING P.A.W.S. 2ND ANIMALS IN ENTERTAINMENT CONFERENCE WHICH IS BEING HELD IN HOLLYWOOD CALIFORNIA, THIS SEPTEMBER 17TH AND 18TH.

WITH REGARDS TO THE ICE SHOW OPERATIVE - HE HAS BEEN ASSIGNED TO THE NEW ALADDIN SHOW AND I EXPECT REPORTS TO BE FORTHCOMING.

I HAVE ALSO PROVIDED YOU WITH A BUSINESS CARD FROM MS. LORI WHITE-PACHECO CONNECTED TO "GO APE", FOR YOUR OWN RECORDS.

PER OUR CONVERSATION ON AUGUST 23, 1993, REFERENCE THE TERMINATION OF THE COVERT OPERATIONS, I WOULD PROPOSE THE FOLLOWING.

I KEEP THINKING BACK TO WHEN WE HAD AN OPERATIVE INSIDE A KEY POSITION LOCALLY, PULLED SAME OUT AND THEN WERE REQUESTED TO PUT HER BACK IN, BUT WERE UNABLE TO PLACE HER IN A KEY POSITION, THEREBY LOSING OUR ORIGINAL ADVANTAGE.

ADDITIONALLY, THE PREVIOUS MONIES SPENT, THE MAJORITY OF WHICH COVER DEVELOPMENT COSTS, HAVE RESULTED IN A REALISTIC PROJECT THAT CAN BE BUILT UPON, AT MINIMAL COST, REALIZING DRAMATIC RESULTS, NAMELY OUR "CIRCUS ANIMALS LOVE CHILDREN", THEME PRESENTATIONS.

REDACTED

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SMITH-PETA 0820CT

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AT PRESENT I AM BILLING EXPENSES PLUS A BASE WHICH COVERS THE FOLLOWING:

R. FROEMMING -	WEEKLY SALARY:	\$5,000.00
MAIN PPF OPERATIVE	WEEKLY SALARY:	\$1,500.00
CALIFORNIA REP	WEEKLY SALARY:	\$1,000.00
MAIN REP GO APE	WEEKLY SALARY:	\$2,000.00

THE REMAINING \$500.00 BILLING PER WEEK FOR THE OPERATIVES HAS BEEN, IN THE PAST, APPLIED TO THE TAX LIABILITY FROM THESE PAYMENTS WHICH HAVE TO BE TREATED AS EARNED INCOME.

FOR THE TAX YEAR OF 1992 - I WAS SHORT BY \$31,114.74, WHICH I PAID FOR MYSELF OUT OF MY SALARY.

THE ADDED TEMPORARY INCREASE IN EXPENSES RESULTED FROM THE DEVELOPMENT COSTS OF " GO APE " , PRODUCTION OF A CIRCUS INDUSTRY FILM WITH DICK VAN PATTEN.

PRIVILEGED

PRIVILEGED

AT THIS TIME, WE HAVE COMPLETED 24 DEMONSTRATIONS, WITH REMAINING ACTIVITIES HAVING BEEN PLANNED FOR:

- SAN FRANCISCO - ANIMAL WALK - OPENING
- SAN JOSE - RIBBON CUTTING CEREMONY - WALK - OPENING
- SACRAMENTO - P.A.W.S. CONFRONTATION
- MEETING WITH KEY LEGISLATURES
- ANIMAL WALK AND OPENING

THESE ACTIVITIES HAVE BEEN PLANNED IN ADVANCE AND THE SUPPLIES FOR SAME HAVE BEEN PREVIOUSLY ORDERED AND PAID FOR.

CANCELLATION OF SAME AT THIS TIME, COULD CAUSE SOME PROBLEMS AND ALSO RAISE QUESTIONS - WHY ALL OF A SUDDEN ARE THESE GROUPS APPEARANCES MISSING FROM THE ABOVE ?

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REDACTED

REMEMBER WE GOT HIT HARD LAST YEAR IN BOSTON, REDACTED

REDACTED

IN MY CURRENT BILLING, I HAVE INCLUDED THE SALARY BILLING FOR THE WEEK OF 6-28-93 THROUGH 7-4-93, PLUS THE LISTED EXPENSES.

I AM STILL CARRYING EXPENSES AND THE REMAINING COSTS OF THE FILM PRODUCTION WITH DICK VAN PATTEN, WHILE WE AWAIT THE LICENSING RELEASE WHICH ALLOWS US TO USE HIS - CIRCUS OF THE STARS FOOTAGE THAT I EXPECT TO RECEIVE BY THE END OF THE WEEK.

IF A DECISION IS MADE TO COMPLETELY CUT ALL CONTACT WITH THE OPERATIVES AND RINGLING EITHER DOES NOT LIKE THE CIRCUS INDUSTRY FILM, OR IF IT'S USE CAN NOT BE INCORPORATED FOR USE IN-HOUSE THROUGH SOME MEANS, THEN I WILL NOT BILL OUT FOR THE FILM.

I HAD PREVIOUSLY BILLED SOME MONIES FOR SAME, WHICH I WILL ADD TO THE REMAINING MONIES LEFT ON THE BILLING AND APPLY THESE MONIES TO BACK BILLING ON THE SALARIES, THEREBY RELEASING RINGLING FROM ANY FINANCIAL RESPONSIBILITY FOR THE FILM.

I WOULD HOWEVER SUGGEST THE FOLLOWING, TO ENSURE THAT ON A NEED TO USE BASIS, THE FOLLOWING MECHANISM REMAINS IN PLACE. IF, AFTER CONTINUED REVIEW, IT IS FELT THAT WE NO LONGER NEED TO CALL ON THESE OUTSIDE ALLIES, AT THAT TIME, WE COULD COMPLETELY SEVER OUR RELATIONSHIP.

I AM CONCERNED THAT WE MAY BE UNDER-ESTIMATING THE EFFECTIVENESS OF THIS PROGRAM AND MAY BE PREMATURELY CUTTING OUR TIES TO SAME, ONLY TO BE HIT AGAIN IN THE FUTURE WITHOUT HAVING THE CAPABILITY TO RESPOND TO THESE AGGRESSIVE ACTIONS.

ONCE THE OPERATIVES ARE RELEASED - I SINCERELY DOUBT THEY WOULD BE EITHER WILLING OR ABLE TO RE-ENTER THE PROGRAM WITH THE AMOUNT OF CONTROL THEY EXPERIENCED IN THE PAST.

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RICHARD FROEMMING - PROPOSED ROLE

CONTINUE DIRECT INVOLVEMENT WITH EACH UNIT - ENSURE ON-SIGHT SECURITY AND CONTINUE TO MAKE RECOMMENDATIONS INTERNALLY TO COUNTER THE ACTIVISTS THRUST AGAINST THE CIRCUS.

CONTINUE TO DIRECT THE IMAGE / AWARENESS ISSUE AND BY DIRECT PRESENCE AT THE UNITS - ENSURE CONSISTENCY AS TO RINGLING CORPORATE POLICY REGARDING THEIR ANIMALS.

BASICALLY - AN EXECUTIVE ASSISTANT OR DIRECTOR OF CORPORATE POLICY REGARDING ANIMAL WELFARE ISSUES.

TIE SOME OF MY DUTIES TO INCORPORATE RESPONSIBILITIES FOR SAME TO NETWORK WITH THE LOSS CONTROL PROGRAM WITHIN RINGLING WHICH I INDICATED DURING A EARLIER MEETING WITH MR. JENSEN ARE VERY CLOSELY RELATED AT THIS TIME.

MORE INVOLVEMENT WITH THE UNITS TO UTILIZE CAPABILITIES SUCH AS PARTICIPATION IN BACK STAGE TOURS IN SPECIFIC CITIES AND HELP WITH THE DEVELOPMENT OF ANY PROJECTS, INVOLVING ANIMALS TO COUNTER ACTIVISTS CLAIMS AND ATTACKS AGAINST THE CIRCUS INDUSTRY.

SINCE I AM GOING TO BE IN SACRAMENTO FOR THE ANIMAL WALK AND OPENING NIGHT - ALONG WITH THE LEGISLATIVE NIGHT - I HAVE ASKED BOTH MR. BLOOM AND MR. HUEY IN MY CORRESPONDENCE OF THIS DATE, IF THEY WANT MY PARTICIPATION IN SAME.

QUITE FRANKLY, I HAVE A LOT OF EXPERIENCE DEALING WITH LEGISLATURES WHO WERE MISLED ON THE CONDITIONS WITHIN THE CIRCUS INDUSTRY, YET I HAVE NOT BEEN CALLED UPON TO UTILIZE THIS EXPERIENCE FOR RINGLING - WHY NOT ?

I HAVE ALSO BEEN TOLD NOT TO SPEAK TO THE PRESS, REGARDING ANIMAL ISSUES - YET ANOTHER CONSULTANT - JULIAN READ - DEALT WITH THE PRESS IN L.A., WITHOUT POSSESSING THE ANSWERS OR KNOWLEDGE AS TO EXACTLY WHAT WAS GOING ON WITH THE ELEPHANTS IN OUR "PLAY PEN". - NAMELY - WHY ONE OF THE ELEPHANTS WAS TETHERED TO A CHAIN WHILE IN THE MIDDLE OF THE PLAY PEN.

TORONTO - FINISH UP WITH THE GROUND WORK REQUIRED REFERENCE THE PROPOSED ANIMAL WELFARE ACT, CURRENTLY BEING CONSIDERED BY THE PROVINCIAL GOVERNMENT

PRIVILEGED

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FLORIDA - FOLLOW THROUGH DIRECTING MR. KENDALL'S ACTIVITIES TO DEFEAT THE PROPOSED BAN'S IN BOCA RATON AND ROYAL PALM BEACH, FLORIDA. ALSO MONITOR KENDALL'S COALITION ACTIVITIES DIRECTED AT CHALLENGING THE CONSTITUTIONALITY OF THE EXISTING BANS IN LAUDERDALE LAKES AND HOLLYWOOD, FLORIDA.

GO APE - FOLLOW THROUGH WITH INITIAL PLANS TO MAKE THIS OPERATION SELF FINANCING BY THE END OF THE YEAR, WITH ONLY COSTS TO COMPANY, BEING MONIES SPENT TO ENSURE CONTROL AND DIRECTION.

PPF - ADDRESS CURRENT ACTIVITIES FROM A COST EFFECTIVE STAND POINT, UTILIZE SPECIFIC INVOLVEMENT OF OPERATIVES ON AN AS NEEDED BASIS WITHIN KEY CITIES AS DETERMINED BY THE COMPANY.

PPF - FOLLOW THROUGH WITH THE INITIAL WORK ON A CIRCUS INDUSTRY THEME PRESENTATION WITHIN ACTUAL SCHOOL DISTRICTS, WORK TOWARDS OBTAINING AN EDUCATIONAL GRANT FOR SAME, TO MAKE PROJECT SELF FINANCING.

PROPOSED ROLE AND COST FOR CURRENT OPERATIVES

MAIN PPF - OPERATIVE: REDUCE WEEKLY FEE TO \$1,000.00 A WK
----- SAVINGS - \$26,000.00 A YEAR

BENEFIT - UTILIZE FOR SPECIFIC NEED SUCH AS CURRENT ACTIONS IN FLORIDA ALSO MOVING THE CIRCUS INDUSTRY VIDEO INTO KEY MARKETS - PBS, ECT.

WOULD ALLOW USE OF MATERIALS AND PROJECTS PREVIOUSLY FUNDED WHICH ENSURE COMPANIES BENEFIT FROM SAME AND WOULD ALLOW FOR KEY CITY DEMONSTRATIONS ON A NEEDED BASIS **

COSTS FOR SAME COULD BE ESTIMATED * PRIOR TO DECISION TO IMPLEMENT DEMO

EFFECTIVELY BUDGET ADDITIONAL EXPENSES FOR VARIOUS PROJECTS - ALSO FULLY MAXIMIZE EFFECTIVENESS OF SAME BY REVIEWING VARIOUS NEEDS

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CALIFORNIA PPF REP

REDUCE WEEKLY FEE TO \$750.00 PER WK
SAVINGS - \$13,000.00 A YEAR

REDACTED

GO APE OPERATIVE

REDUCE WEEKLY FEE TO \$1,500.00 WEEK
SAVINGS - \$26,000.00 A YEAR

MONTHLY EXPENSES - CURRENT \$2,700
WHICH COVERS OFFICE RENT FOR GROUP

YEARLY COST - \$32,400.00

BENEFITS - START UP COSTS HAVE BEEN
ABSORBED - GROUP IS MOVING TOWARDS
BECOMING FINANCIALLY INDEPENDENT AS
FAR AS THE COST OF UPCOMING
PROJECTS - SUCH AS PBS SPECIALS ECT

CONTROL WOULD REMAIN IN PLACE TO
DIRECT VIABLE GROUP ABLE TO ATTACK
POLICIES NATIONAL ACTIVISTS GROUPS
AS THEY PERTAIN TO ANIMAL WELFARE *

BY LIMITING THE INVOLVEMENT - COMPANY WOULD BE ABLE TO
DIRECTLY CONTROL EXPENSES ON A SPECIFIC CASE BY CASE REQUIREMENT
AND BY NETWORKING PROPERLY BETWEEN DECISION MAKERS WITHIN COMPANY
MAXIMUM EFFECTIVENESS AT A REDUCED YEARLY BUDGET COULD
EFFECTIVELY BE REALIZED.

IRREGARDLESS OF THE DECISION REGARDING THE FINAL DISPOSITION
CONCERNING THE DIRECTION AND ROLE OF THIS PROJECT, I HAVE
TARGETED THE EXPENSES - AS WELL AS BILLING OR CREDIT RETURN
REFERENCE MR. VAN PATTEN'S VIDEO, TO BE COMPLETED BY THE BILLING
PERIOD ENDING OCTOBER 1, 1993.

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AT THAT TIME, DEPENDING ON THE DECISION, THE CURRENT WEEKLY BILLING WILL BE IMPLEMENTED AT THE REDUCED WEEKLY RATE, UNDER \$10,000.00, OR I CAN MAKE ARRANGEMENTS TO SEVER THE CONTACTS WITH THE VARIOUS OPERATIVES, CLOSING DOWN THAT PORTION OF THE OPERATION IN IT'S ENTIRETY.

BY REDUCING THE BASE WEEKLY BILLING FOR MYSELF AND THE THREE OPERATIVES TO THE PROPOSED LEVEL OF \$8,250.00, I WOULD BE ABLE TO SPREAD OUT THE EXPENSES FOR THE BUSINESS OPERATING EXPENSES, PHONES, ECT ON A MONTHLY BASIS OVER THE FOUR WEEK BILLING PERIOD WHICH WOULD KEEP THE OVERALL BILLING - LESS SPECIFIC PROJECTS AS DIRECTED BY THE COMPANY -- AT THE TARGET FIGURE OF \$10,000 A WEEK.

ADDITIONALLY THE BUSINESS OPERATING EXPENSES OF \$2,700 A MONTH FOR GO APE - WOULD BE BILLED OUT ONCE A MONTH - OR COULD BE SPREAD OUT OVER THE FOUR WEEK PERIOD.

THE ONE ITEM THAT IS NOT COVERED, IS THE TAX LIABILITY - WHICH NEEDS TO BE ADDRESSED. BY PAYING THE OPERATIVES IN CASH - AS REQUIRED FOR THE CONFIDENTIALITY ISSUE - I AM LEFT WITH A TAX LIABILITY FOR THESE MONIES AT THE END OF THE YEAR, WHICH ARE TREATED AS EARNED INCOME.

LAST YEAR, AS INDICATED EVEN WITH THE MONIES BUILT INTO THE WEEKLY BILLING FOR THIS PURPOSE, I WAS STILL SHORT BY OVER \$31,000.00.

I HAVE SUBSTANTIALLY REDUCED THE MONIES SPENT ON THIS PROJECT DURING THE YEAR, AS EVIDENT FROM THE OVERALL BILLING FROM LAST YEAR, WITHOUT COMPROMISING THE EFFECTIVENESS OF THE PROJECT.

INCIDENTALLY, SINCE I JUST HEARD FROM CLAIR GEORGE REQUESTING A MEETING, I ASSUME THAT MY COVERT ACTIVITIES ARE THE ONLY ONES UNDER CURRENT DISCUSSION.

ANOTHER OPTION, WOULD BE TO TRANSFER THE " GO APE " OPERATION INTO HIS, THEREBY REDUCING THE AMOUNT OF MONIES BEING PROCESSED THROUGH RICHLIN, WHILE STILL ENABLING RINGLING TO MAINTAIN WHAT I FEEL WILL BE AN EXTREMELY WORTH WHILE ENDEAVOR, AND UTILIZE AN EXISTING PROJECT, WHICH WAS NOT EASILY DEVELOPED TO MAINTAIN A LEVEL OF CREDIBILITY FOR SAME.

AFTER ALL, THE MONIES ARE NOT BEING PAID TO ME, FOR MY USE, BUT ARE BEING PASSED ON TO FINANCE PROJECTS THAT HAVE BEEN DISCUSSED ON A WEEKLY BASIS, THROUGH MY INTERNAL CORRESPONDENCE.

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IN MY MEETING WITH MR. BLOOM ON JULY 2, THESE PROJECTS PER MR. BLOOM HAD BEEN REVIEWED, AS HE INDICATED THAT HE READS EVERYTHING I SEND HIM.

NOTHING WAS DISCUSSED ABOUT CURTAILING THESE PROJECTS, SOME OF WHICH WERE IN DEVELOPMENT, RATHER - HE STATED HE AGREES WITH 99.9% OF EVERYTHING I'M DOING.

I GUESS THE .1% COVERS THE COVERT ACTIVITIES AND OR THE COST OF MAINTAINING THESE VARIOUS ONGOING PROJECTS.

I HAVE DONE MY BEST TO CONTROL THE COST OF THESE PROJECTS, WHILE STILL MAINTAINING A HIGH LEVEL OF SUCCESS FOR SAME. I HAVE EVEN GONE SO FAR AS TO DEFER THE BILLING FOR THESE PROJECTS, WHICH I HAVE HAD TO PAY FOR, PRIOR TO SUBMITTING BILLS TO RINGLING FOR PAYMENT.

QUITE FRANKLY THE FINANCIAL BURDEN REALIZED FROM THESE DEFERRED PAYMENTS HAS BEEN SUBSTANTIAL.

I ENJOY WORKING WITH RINGLING AND FEEL THAT I HAVE PROVIDED A WORTHWHILE SERVICE, AND NO MATTER WHAT THE FINAL OUTCOME IS REGARDING THIS DECISION, I LOOK FORWARD TO CONTINUING MY RELATIONSHIP WITH RINGLING.

I TRUST THAT WE CAN CLARIFY TO EVERYONE'S SATISFACTION EXACTLY WHAT MY ROLE SHOULD BE, IN ORDER TO MAXIMIZE MY EFFECTIVENESS FOR RINGLING THROUGHOUT THE DURATION OF THIS AS WELL AS OTHER ASSIGNMENTS.

I WILL BE GOING TO SAN FRANCISCO THIS AFTERNOON, TO RE-JOIN THE RED UNIT IN OAKLAND, PRIOR TO IT'S DEPARTURE FOR SAN FRANCISCO.

LET ME KNOW HOW YOU WANT THIS HANDLED AND I WILL EXPEDITE SAME AS DIRECTED.

RICHARD T. FROEMMING

SMITH-PETA 0827

PRODUCED PURSUANT TO PROTECTIVE
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SMITH 98-17617 00441
13-1594

BILLING FIVE WEEK PERIOD
 5-3-93 THROUGH 6-6-93

\$63,590.06

BUDGET: \$11,500.00 WEEK - INCLUDES SUPERVISOR SALARY -
 ----- PLUS 1 ICE SHOW OPERATIVE - 2 - PPF OPERATIVES
 1 UNDERCOVER OPERATIVE - ANIMAL RIGHTS GROUPS:

5-3 : 5-9 \$11,500.00 COVERS ALL SALARIES NO EXPENSES
 5-10 : 5-16 \$11,434.49 COVERS ONLY EXPENSES NO SALARIES

COVERS CALIFORNIA OPERATIVE START UP COSTS GO APE
 CWN LEGAL COUNCIL - LOGO DEVELOPMENT PLUS TRIP TO
 D.C. FOR CONFERENCE REF: PeTA WITH CLAIR GEORGE **
 IN D.C. ALSO HAD MEETINGS WITH LORI PACHECO GO APE

5-17 : 5-23 \$12,518.21 COVERS ONLY EXPENSES NO SALARIES

PRIVILEGED

5-24 : 5-30 \$14,589.97 COVERS ONLY EXPENSES NO SALARIES

 \$787.54 KENDALL - PPF PHONE EXPENSES
 \$670.80 CALIFORNIA OPERATIVE EXPENSES IN
 L.A. - TIPPIE HEDREN OPEN HOUSE
 SAN FRAN - TONY LARUSSO PAWS EVENT
 \$5,826.50 GO APE DEVELOPMENT EXPENSES
 \$5,000.00 CALIFORNIA OPERATIVE - MOVE TO LA
 DEPOSIT PLUS FIRST/LAST MONTH RENT
 \$1,305.13 SUPERVISOR EXPENSES - LOS ANGELES
 \$1,000.00 SO. CALIFORNIA PPF OPERATIVE -
 ADVANCE DEMO EXPENSES SAN DIEGO

5-31 : 6-6 \$13,547.39 COVERS ONLY EXPENSES NO SALARIES

\$2,729.86 KENDALL - NIAGARA FALLS BAN HEARING
 PHILADELPHIA DEMONSTRATIONS
 \$817.53 SUPERVISOR EXPENSES PHILADELPHIA
 \$5,000.00 RINGLING LEGAL BILL - J. COLEMAN
 \$5,000.00 "OUR TORONTO" CASH DONATION - PPF

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BILLING 5 WEEK PERIOD: \$101,964.03
 6-7-93 THROUGH 7-11-93 -----

NOTE: HAVE PREVIOUSLY SUBMITTED THE BREAKDOWN OF MONIES
 BILLED FOR PERIOD OF 2-8-93 THROUGH 5-2-93 - HAVE
 INCLUDED THIS DATE: 7/15/93 BILLING WHICH COVERS-
 FIVE WEEK PERIOD BETWEEN 5-3-93 THROUGH 6-6-93 **

6-7-93 TO 6-13-93 \$15,812.79 - JUST EXPENSES

DEVELOPMENT FEE PD OPERATIVE 5/24 \$5,250.00
 FOR " GO APE "

DEVELOPMENT FEE PD OPERATIVE 5/30 \$5,700.00
 FOR " GO APE "

SUPERVISOR CASH DONATION TO PPF \$2,500.00

SUPERVISOR EXPENSES - PHILY \$886.64

KENDALL AIR FARE - EUROPE \$1,476.15

6-14-93 TO 6-20-93 \$14,836.74 - JUST EXPENSES

DEVELOPMENT FEE PD OPERATIVE 6/17 \$2,913.00
 FOR " GO APE "

ADVANCE DEMO EXPENSES - CALIF \$1,000.00

ADVANCE AIR FARE PPF CALIF TO
 TUCSON/PHOENIX/DALLAS/SAN DIEGO \$985.71

SUPERVISOR EXPENSES OMAHA - BLUE \$704.78

KENDALL ADVANCE CASH - EUROPE \$2,500.00

SUPERVISOR LEGAL EXPENSES \$6,733.25

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 13-1596

SMITH-PETA 0829CT 00443

6-21-93 TO 6-27-93	\$16,888.54 - JUST EXPENSES
-----	-----
DEVELOPMENT FEE PD OPERATIVE 6/24 FOR "GO APE" - OFFICE - COMPUTER	\$11,383.52
ADVANCE DEMO EXPENSES - CALIF	\$1,000.00
KENDALL AIR FARE TUCSON-PHOENIX DALLAS SAN DIEGO - PITTSBURGH	\$1,297.90
SUPERVISOR EXPENSES - TORONTO	\$407.83
SUPERVISOR HOTEL BILL TORONTO	\$720.87
KENDALL PPF EXPENSES EUROPE	\$974.61
KENDALL TUCSON RED UNIT EXPENSES	\$535.83
FLEMING TUCSON RED UNIT EXPENSES	\$567.98

GO APE MONIES SPENT - 5-3-93 TO 6/27/93: \$47,507.51
 PRIVILEGED GO APE PLUS SUPERVISOR -- : \$10,731.88

6-28-93 TO 7-4-93	\$32,970.14
-----	-----
EXPENSES PLUS SALARIES - 5-10-93 THRU 5-16-93	

ICE SHOW OPERATIVE	\$1,500.00
PPF(2) & ANIMAL RIGHTS	\$5,000.00
SUPERVISOR SALARY/STAFF	\$5,000.00
TWO BANNERS - SCHOOL PRESENTATION	\$1,893.76
COPIES FOR HANDOUTS PRESENTATION	\$393.51
FILM PROCESSING - HANDOUTS SCHOOLS	\$327.29
KENDALL PPF HOTEL - PHOENIX	\$563.63
FLEMING PPF HOTEL - PHOENIX	\$701.91

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 13-1597

6-28-93 TO 7-4-93 BREAKDOWN OF MONIES CONTINUED:

SUPERVISOR HOTEL PHOENIX	\$208.07
SUPERVISOR HOTEL SAN FRANCISCO	\$608.28
SUPERVISOR VEHICLE S.F.	\$169.53
SUPERVISOR VEHICLE PHOENIX	\$182.12
TWO OPERATIVES PLUS SUPERVISOR EXPENSES S.F. AND PHOENIX	\$896.23
PPF - ORDER 600 T-SHIRTS	\$4,650.00
BLANK VIDEO TAPES	\$448.88
GO APE DEVELOPMENT COSTS PAID TO OPERATIVE 6/26/93	\$5,800.00
NOTE: AS OF 7/15 OPERATIVE HAS \$4,561.63 MONIES -LEFT	
CONFIDENTIAL INFORMANT FEE PAID TO OPERATIVE SAN DIEGO MONITOR LAMBERT - SAN DIEGO	\$2,500.00
KENDALL PPF EXPENSES - DALLAS PRELIMINARY WORK ON THEME VIDEO	\$2,126.93

7-4-93 TO 7-11-93 \$21,455.82 - JUST EXPENSES

CALIFORNIA OPERATIVE - "GO APE "
EXPENSES LORI PACHECO - IN L.A. \$584.00
OVER THE JULY 4TH WEEKEND

PPF EXPENSES FROM DALLAS INCLDS
MEETINGS NATIONAL REPRESENTATIVES
MEMBERS ATTEND CALIFORNIA DEMO'S \$354.42

SMITH 98-17617
13-1598

PRODUCED PURSUANT TO PROTECTIVE
ORDER: CONFIDENTIAL, SUBJECT TO A CLAIM
OF PRIVILEGE

SMITH-PETA 0831CT 00445

PRODUCED PURSUANT TO PROTECTIVE
ORDER: CONFIDENTIAL, SUBJECT TO A CLAIM
OF PRIVILEGE

7-4-93 TO 7-11-93 BREAKDOWN OF MONIES CONTINUED

KENDALL AIR FARE - FT. LAUDERDALE
ADDRESS COUNCIL - BAN HEARING IN
BOCA RATON MONDAY/TUE 7/12 7/13
THEN TO HOUSTON FOR ANIMAL WALK : \$1,354.00

SUPERVISOR HOTEL - SAN DIEGO 7/5 \$3,137.17
THRU 7/12 -PLUS CAR - EXPENSES : \$168.99

SUPERVISOR EXPENSES - SAN DIEGO
INCLUDES CASH PAYMENTS - INFORMANT'S
INTERVIEWS LAMBERT AND EX RINGLING'S \$3,262.00

PPF OPERATIVE - CALIFORNIA ADV DEMO \$1,000.00

COST OF ANIMAL WALK OPENING SAN DIEGO \$3,719.62
PLUS ANIMAL WALK LONG BEACH, CALIFORNIA

BREAKS DOWN TO A COST OF \$1,239.87 PER DEMO
COVERS PROFESSIONAL BALLOON CLOWNS TO MAKE UP
ANIMAL BALLOONS FOR CHILDREN AT WALK & DEMO'S

PPF SUPPLIES FOR ANIMAL WALK - SCHOOL EDUCATION
OPENING NIGHT DEMO'S - FOR UPCOMING USE BY PPF-
IN LONG BEACH - HOUSTON - L.A. AND ANAHEIM DEMO

T-SHIRTS AIR FREIGHT TO CALIF \$525.62
T-SHIRTS CIRCUS DESIGN - KIDS \$2,600.00
T-SHIRTS CIRCUS DESIGN - KIDS \$2,500.00
PPF T-SHIRTS - WE LOVE CIRCUS \$2,250.00

NOTE - CHILDREN T-SHIRTS - ARE OBTAINING AT
COST OF \$4.50 AND \$5.00 PER SHIRT - OPPOSED
PPF NEON SHIRTS FOR OPENING DEMO AT \$7.50

ADDITIONAL MONIES - NOT BILLED - COVERS SALARIES AS FOLLOWS:

\$5,000 WEEK - RTF \$5,000 WEEK OPERATIVES \$1,500 WEEK ICE

HAVE NOT BILLED OUT SALARIES 5/17/93 THROUGH 7/11/93

PPF - MAIN OPERATIVE - \$1,500.00 A WEEK

PPF - CALF OPERATIVE - \$1,000.00 A WEEK

MAIN A/R'S OPERATIVE - \$2,000.00 A WEEK

ICE SHOW OPERATIVE - - \$1,000.00 A WEEK

SMITH-PETA 0832CT

00446

SMITH 98-17617
13-1599

REMAINING WEEKLY BILLING FROM \$6,500.00 IS \$1,000 - WHICH IS
APPLIED TO TAX LIABILITY INCURRED FROM CASH MONIES PAID OUT WHICH
IS TREATED AS EARNED INCOME - TAX LIABILITY '92 \$83,114.74 -SHORT