

EXHIBIT 4

**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)**

Produced Pursuant to Protective Order:
Confidential, Subject to a Claim of Privilege

Richlin Consultants

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SEPTEMBER 29, 1993

ANDY IRELAND
VICE PRESIDENT
GOVERNMENT RELATIONS
8607 WESTWOOD CENTER DRIVE
VIENNA, VIRGINIA 22182

L20-452/L220181
Plaintiff's Exhibit
801

DEAR MR. IRELAND

ENCLOSED PLEASE FIND MY CURRENT REPORT, WHICH COVERS THE ACTIVITIES IN BOCA RATON, REFERENCE THE DEFEAT OF PROPOSED ORDINANCE 4115 LAST EVENING.

THE VICTORY WAS DECISIVE AND I'M SURE THAT MS. STRAUSS WILL HAVE SOME RELEVANT INSIGHTS FOR YOU UPON HER RETURN LATER IN THE DAY.

I AM HAVING MR. KENDALL, ALSO DIRECT A LETTER TO THE NEWSPAPER IN DENVER, ATTACKING THE CREDIBILITY OF THE FREE-LANCE WRITER, AND ALSO TO TIE IN THE RECENT DEFEAT OF A PROPOSED BAN IN BOCA RATON TO ALSO ATTACK THE CREDIBILITY OF SOME OF THE ACCUSATIONS IN THIS ARTICLE.

LET ME KNOW IF YOU DO NOT HAVE A COPY OF THE P.A.W.S. TAPE THAT IS REFERRED TO IN THE ARTICLE AND I WILL MAKE A COPY FOR YOU.

WE (PPF) WILL BE FOLLOWING UP WITH CHALLENGES TO THE EXISTING BANS IN LAUDERDALE LAKES, HOLLYWOOD AND ST. PETERSBURG, FLORIDA, BEGINNING NEXT MONTH.

WE HAVE AN EXCELLENT COALITION DIRECTED BY MR. KENDALL IN FLORIDA, ALONG WITH THE ACTIVE SUPPORT FROM REPRESENTATIVES OF THE FLORIDA GAME AND FRESH WATER FISH COMMISSION.

WE MUST NOT FORGET HOWEVER THAT THIS IS ALSO THE HOME OF NANCY ALEXANDER, WHO IS A PIVOTAL LEADER IN THE ACTIVIST COMMUNITY TOWARDS OBTAINING THESE BANS IN FLORIDA AND ALSO IN HELPING ACTIVISTS IN OTHER STATES MOVE TOWARDS SIMILAR LEGISLATION, COORDINATING HER ACTIVITIES THROUGH P.A.W.S., ED STEWART AND PAT DERBY IN CALIFORNIA.

FOR THIS REASON, IT IS IMPORTANT THAT WE MAINTAIN A FIRM POSITION AGAINST HER CAMPAIGN. WE CAN EXPECT SIGNIFICANT DEMONSTRATIONS DURING OUR UNIT'S UPCOMING PERFORMANCES IN BOTH MIAMI AND ALSO IN ST. PETERSBURG.

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I WILL OUTLINE DURING OUR NEXT MEETING, OUR PLANS TO COUNTER THE ACTIVISTS DURING THESE PLANNED DEMONSTRATIONS.

I HAVE PROVIDED THE FOLLOWING FOR YOUR REVIEW, WHICH SHOULD PROVIDE SOME BACKGROUND, AS TO MY ACTIVITIES SURROUNDING DIRECT INVOLVEMENT WITH THE UNITS, AND THE TIE IN TO SAME, WITH A THIRD PARTY - PUTTING PEOPLE FIRST AND OR GO APE.

COPIES OF MY REPORTS OF SEPTEMBER 13 AND SEPTEMBER 20, 1993.

BOTH OF THESE REPORTS, WILL HIGHLIGHT SOME OF MY ACTIVITIES WITH THE RED UNIT IN SAN JOSE AND SACRAMENTO, AS WELL AS OUR USE OF PUTTING PEOPLE FIRST IN BOTH CITIES.

I DO NOT HAVE THE VIDEO WHICH SHOWS THE NEWS COVERAGE IN SACRAMENTO OR SAN JOSE, PERHAPS RODNEY CAN OBTAIN A COPY FROM MR. BLOOM FOR YOUR REVIEW.

CHANNEL 5 IN SAN JOSE COVERED THE OPENING NIGHT ACTIVIST DEMONSTRATIONS, AND A REVIEW OF SAME, WILL HIGHLIGHT MY DISCUSSIONS ABOUT THIRD PARTY INTERVENTION ON OUR BEHALF, PUTTING PEOPLE FIRST, DIRECTLY ATTACKING THE ACTIVISTS MOTIVATION FOR THEIR DEMONSTRATION.

ALSO THE REPORT OF SEPTEMBER 20, CONTAINS A SUMMARY OF THE ACTIVISTS ACTIVITY THIS YEAR, THROUGHOUT OUR TOUR IN CALIFORNIA WITH THE RED UNIT.

I HAVE PROVIDED YOU WITH A COPY OF THE CIRCUS KNIE 1992 PROGRAM, WHERE THEY TRAVELED WITH CIRQUE DU SOLEIL USING THEIR ANIMALS AS PART OF THE PROGRAM.

THE ACTIVISTS LIKE TO BRING UP THIS CIRCUS AS AN ALTERNATIVE TO CIRCUSES WITH ANIMALS.

IN NOVEMBER OF 1992, WE WERE ASKED TO SUBMIT IMPLEMENTATION PLANS FOR REVIEW IN ADDRESSING THE ANIMALS RIGHTS ISSUES THAT EFFECT RINGLING BROS.

I HAVE PROVIDED YOU WITH A COPY OF MY ORIGINAL IMPLEMENTATION PLAN AS WELL AS A SUPPLEMENTAL PLAN WHICH WILL PROVIDE YOU WITH SOME ADDITIONAL BACKGROUND MATERIAL.

I HAVE ALSO PROVIDED YOU WITH A COPY OF OUR - MASTER IMAGE ENHANCEMENT PLAN, WHICH I HAVE IMPLEMENTED ON THE UNIT LEVEL WITH BOTH THE RED AND BLUE UNIT'S.

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VARIOUS COMPONENTS FROM THESE THREE PLANS, WERE USED TO GET US TO OUR CURRENT POSITION IN DEALING DIRECTLY WITH THE PROBLEMS PRESENTED BY THE ANIMAL RIGHTS ACTIVISTS.

I HAVE ALSO INCLUDED A COPY OF MY JULY 26TH REPORT, WHICH COVERS THE ACTIVITIES IN LOS ANGELES, WHERE WE EXPERIENCED A MAJOR ACTIVIST DEMONSTRATION, FROM FLORANCE LAMBERT AND HER ELEPHANT ALLIANCE, BASED IN SAN DIEGO, CALIFORNIA.

I HAVE PROVIDED YOU WITH A COPY OF THE TAPES FROM THE P.A.W.S. ANIMALS IN ENTERTAINMENT CONFERENCE HELD IN LOS ANGELES, SEPTEMBER 17 - 19, 1993, WITH A COPY OF THEIR PAMPHLETS USED DURING SAME.

THE ACTIONS THAT WE HAVE INITIATED WITHIN THE UNITS, AS WELL AS THE PERIPHERAL OPERATIONS ARE ALL GEARED TO OFFSET THE ACTIVISTS THREE MAJOR CLAIMS AGAINST THE CIRCUS:

CHAINED FOR LIFE LIFE OF BOREDOM CRUEL TREATMENT

RATHER THAN JUST MAKING COPIES OF THE REST OF MY REPORTS, THE MAJORITY OF WHICH YOU SHOULD HAVE RECEIVED FROM RODNEY, I THINK IT WOULD BE MORE ADVANTAGEOUS IF WE SIMPLY SAT DOWN AND REVIEWED THE SITUATION AS IT STANDS TODAY, WITH RECOMMENDATIONS AS TO THE DIRECTION YOU WOULD LIKE US TO TAKE.

ALSO, WHILE YOU ARE OUT OF THE COUNTRY, I WILL HOLD OFF ON MY REPORTS AWAITING YOUR RETURN, BUT WILL KEEP YOUR ASSISTANT APPRAISED OF ANY IMMEDIATE PROBLEMS THAT YOU SHOULD BE MADE AWARE OF, AS WELL AS PREPARATIONS FOR BUFFALO AS DISCUSSED.

I AM LOOKING FORWARD TO WORKING WITH YOU, AND PLEASE FEEL FREE TO CALL UPON ME AT ANYTIME FOR ANYTHING THAT YOU NEED.

RICHARD T. FROEMMING

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