

**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF  
THE FUND FOR ANIMALS, ANIMAL WELFARE INSTITUTE, AND HSUS'  
MOTION FOR A PROTECTIVE ORDER**

**Civ. No. 1:07-cv-1532**

**Ex. 9**

**Confidential Mem. on PETA and PAWS**

P.E.T.A. - P.A.W.S.

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

M A Y 1 5 , 1 9 9 1

-----  
PUTTING PEOPLE FIRST  
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FRIDAY - MAY 10, 1991 - ALBANY

9:30 AM & 10:00 AM - ANIMAL UNLOADING/PARADE

NO P.E.T.A. DEMONSTRATORS SHOW UP .....

WE TALK TO SUZANNE SMITH W/ RINGLING .....

DOES NOT WANT US TO SET UP OUR P.P.F. DEMONSTRATION ..

NOTE:  
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THIS COULD BE A MISTAKE .....

LOTS OF PRESS OUT AND ABOUT ...

GOOD CHANCE FOR POSITIVE INTERVIEWS .....

NO CONTRADICTIONS FROM P.E.T.A. ....

IN FUTURE IF THIS HAPPENS ... SUGGEST ...

GO AHEAD WITH POSITIVE DEMONSTRATION --- TALK TO PRESS

\*\*\*\*\* GOOD PHOTO'S , ECT. -- WHAT DO YOU THINK ???

OPENING NIGHT - P.P.F. GROUP ARRIVES AT 6:00 PM

ABOUT TWO DOZEN DEMONSTRATORS FROM P.E.T.A. GROUPS

THEY HAVE POSTERS - TWO CHILDREN AND COSTUMES .....

NOT PROTESTING UNDER P.E.T.A. - BUT USING THE NAME

.. ANIMAL RIGHTS LITIGATION, INC. ....  
PHONE: 382-0656

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13-1159

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P.E.T.A. TACTICS AT OPENING NIGHT DEMONSTRATION  
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SEVERAL MEMBERS WALKING AROUND IN A CIRCLE IN FRONT OF ARENA  
WE INFILTRATE THE CIRCLE WITH OUR: "ANTI CIRCUS LIAR" SIGNS  
OTHER MEMBERS ARE TRYING TO TALK TO P.P.F. TO DISTRACT THEM

DOESN'T WORK - WE STILL GET OUR POINT ACROSS  
BOTH TO THE CIRCUS CUSTOMERS AS WELL AS THE PRESS

PRESS INTERVIEWS P.P.F. AS WELL AS THE P.E.T.A. DEMONSTRATORS  
RESULT: NO BAD PRINT PRESS RECEIVED BY RINGLING IN LOCAL PAPER  
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TV COVERAGE -- SHOWS BOTH GROUPS OUT FRONT DEMONSTRATING .....

OUR TWO CIRCUS BANNERS -- STAND OUT -- LOOK GOOD -  
ATTRACT ATTENTION OF CIRCUS PATRONS AS WELL AS THE PRESS

SEE PHOTOGRAPHS THAT WERE TAKEN OF THE DEMONSTRATION ....  
ALSO NEXT DAYS - NEWSPAPER INCLUDED WITH THIS REPORT ....

SUMMARY OF DEMONSTRATION:  
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WE WERE OUTNUMBERED - 3 TO 1

STILL MADE OUR PRESENCE FELT

THE PRESS INTERVIEW BY P.E.T.A. DID NOT GO THAT WELL

THEY ALSO HAD TO ANSWER QUESTIONS ABOUT P.P.F. -----

WERE NOT ALLOWED TO JUST RAMBLE ON ABOUT THEIR PROPAGANDA

NOW QUESTIONS ARE BEING RAISED AS TO THEIR ORGANIZATION ..

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UPCOMING PLANS FOR P.P.F.  
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ARE CURRENTLY ORGANIZING SAN DIEGO DEMONSTRATION  
THIS WILL BE A BIG ONE BY P.E.T.A. ....  
FLORANCE LAMBERT IS GOING TO BRING OUT A LOT OF TROOPS  
WANTS TO MAKE A LASTING IMPRESSION ON THE PRESS  
REGARDING RINGLING'S FIRST STOP IN CALIFORNIA ..  
CLEVLAND AMORY - FUND FOR ANIMALS - WILL BE PRESENT

NOTE: POSSIBLE DEMONSTRATION IN PHOENIX  
----- BY LOCAL P.E.T.A. CHAPTER -----

ANIMAL WALK AND ALSO OPENING NIGHT  
SHOULD WE MAKE PLANS TO COUNTER WITH P.P.F. DEMONSTRATION  
OR HOLD OUT FOR A BIG SURPRISE FOR FLORANCE IN SAN DIEGO ?

REDACTED

REDACTED

ONE PROBLEM WITH PUTTING PEOPLE FIRST

M O N E Y

SEE ATTACHED FILING - APRIL 10, 1991  
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PUTTING PEOPLE FIRST IS STILL IN IT'S INFANT STAGES  
WE HAVE TAKEN CONTROL OF THE CIRCUS ACTIVITIES WITHIN SAME  
BUT THEY NEED SOME HELP WITH FUND RAISING

BY THE END OF THIS SEASON ....

WE SHOULD HAVE A FAIRLY SOLID NETWORK ESTABLISHED WITHIN P.P.F.  
TO COUNTER P.E.T.A. AT THEIR MAJOR DEMONSTRATIONS AGAINST CIRCUS

WE ARE CURRENTLY TRYING TO BECOME MORE INVOLVED WITH P.P.F.

HELPING WITH THE FUND RAISING - MEMBERSHIP, ECT. ...

IF SUCCESSFUL - SHOULD HAVE IN PLACE A COORDINATED PLAN RE: PETA

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THE FIRST PART : HAVING A LARGE IN PLACE NETWORK

TO CONDUCT COUNTER DEMONSTRATIONS

TAKING THE PRESS CONTROL AWAY FROM P.E.T.A.

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THE SECOND PART: ATTACK P.E.T.A. AT THEIR WEEK POINTS

LAW SUITS

LEGISLATION

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GOVERNMENT INTERACTION

MONEY IRREGULARITIES - PUBLIC SUPPORT SMITH-PETA 0486

GET OTHER INDUSTRIES INVOLVED IN FIGHT .....

FUR - ANIMAL RESEARCH - GOVERNMENT - ECT.

BY KEEPING UP THE PRESSURE ON P.E.T.A. ON BOTH FRONTS ....

THEY WILL HAVE A HARD TIME KEEPING DEMONSTRATORS ON FRONT LINE

WILL SPEND MORE OF THEIR RESOURCES IN DEFENDING THEIR ACTIONS

WILL HAVE TO DEAL WITH PUBLIC CRITICISM OF THEIR GROUPS ----

NOTE: THIS HAS BEEN APPARENT FROM OUR TWO DEMONSTRATIONS ..

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WHEN CIRCUS PATRONS SEE PUTTING PEOPLE FIRST OUT FRONT

NOT ONLY DO THEY VOICE THEIR SUPPORT FOR P.P.F. BUT --

THEY ARE MORE WILLING TO VOICE OPINIONS ABOUT P.E.T.A.

LOTS OF HANDOUTS BEING THROWN DOWN - PLUS VERBAL ATTACKS

AGAINST THE DEMONSTRATORS OF P.E.T.A.

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

ONE LAST ITEM ABOUT OUR FUTURE PLANS  
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PUTTING PEOPLE FIRST - BUMPER STICKERS  
SAVE A CIRCUS - TRAIN AN ACTIVIST . . . .  
THESE WILL LOOK GREAT ON THE CARS OF DEMONSTRATORS  
FROM THE ANIMAL RIGHTS GROUPS IN CALIFORNIA . . . . .  
CAN SEE FLORANCE LAMBERT DRIVING AROUND W/ONE ON HER CAR . . . .

SPEAKING OF FLORANCE LAMBERT  
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THIS LITTLE LADY - HAS MAJOR PLANS FOR THIS YEAR

FIRST:  
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SHE IS UPDATING HER PRESS RELEASE -  
READING OLD BARNUM AND BAILEY FACT BOOKS . . .  
PULLING FACTS FROM SAME TO ADD TO HER PRESS RELEASE . .

( ISN'T THIS A COPYRIGHT INFRACTION ? )

FIRST ONE SHE IS GOING TO USE:

APPROX 100 YEARS AGO DURING A PERFORMANCE IN ENGLAND

ONE OF THE BULL ELEPHANTS KILLED A HANDLER . . . . .

MR. BAILEY PUT IT IN A CRATE - LOADED IT ON A SHIP .

IN THE MIDDLE OF THE OCEAN - PUT WEIGHTS ON THE CRATE

( DOESN'T AN ELEPHANT WEIGH ENOUGH ? )

DROPPED THE ELEPHANT IN THE OCEAN . . . . .

ALSO PUTTING IN SOME ARTICLES ABOUT BULL ELEPHANTS

THAT WERE SHOT - OUTRIGHT FOR BEING UNRULY . . . . .

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SOME OF THE QUESTIONS BEING ASKED BY FLORANCE

WHICH SHOW IS TRAVELING TO THE WEST COAST ?  
HOW MANY ELEPHANTS IN THE SHOW ?  
ARE THEY (RINGLING) RUNNING THREE SHOWS THIS YEAR ?

PHOENIX - ARIZONA

JUNE 25 - FLORANCE HAS ORGANIZED A DEMONSTRATION  
SHE HERSELF WILL NOT BE PRESENT - BUT GOOD POSSIBILITY  
DOLL STANLEY - IN DEFENSE OF ANIMALS - WILL BE .....  
WANT TO GET AN EARLY START HARASSING RINGLING AND ALSO  
GET AS MUCH INFORMATION AGAINST THEM AS POSSIBLE WHILE  
THE SHOW IS ON THE WEST COAST

SPEAKING OF PHOENIX - THIS IS IMPORTANT

FLORANCE WANTS TO FIND SOMEONE TO PUT UNDERCOVER  
INTO RINGLING'S SHOW - WHEN IT ARRIVES IN PHOENIX  
HAS ASKED OUR OPERATIVE - TO HELP HER FIND SOMEONE

~~WHAT IS IT SHE IS LOOKING FOR ?~~

WANTS TO KNOW WHAT THE ELEPHANTS EAT

HOW OFTEN THEY EAT

WHO FEEDS THEM

ARE THEY GIVEN MEDICATION

IF SO - WHAT TYPE - HOW OFTEN

BY WHOM - HANDLER OR VET .....

FLORANCE IS PUTTING A LOT OF EMPHASIS ON MEDICATION

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SHE IS TRYING TO PROVE SOMETHING REGARDING MEDICATION  
WON'T SAY WHAT IT IS - BUT FINAL RESULTS WILL END UP IN  
SACRAMENTO IN JANUARY  
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SUGGESTION:  
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WHY NOT PUT ONE OF OUR OWN OPERATIVES IN THE SHOW  
FEED WHATEVER INFORMATION WE WANT TO FLORANCE ....  
THIS WILL CONTROL THE INFORMATION SHE IS GETTING  
WILL ALSO TELL US MORE OF WHAT SHE IS LOOKING FOR .  
WILL STOP HER FROM FINDING SOMEONE HERSELF .....

ALTERNATIVE:  
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MAKE SURE NO ONE NEW IS HIRED FOR THE SHOW ....  
BEGINNING WITH PHOENIX THROUGH CALIFORNIA .....

OTHER PLANS BY FLORANCE  
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WILL BE IN WASHINGTON D.C. - JUNE 21 TO 24TH, 1991

~~ATTENDING: NATIONAL ALLIANCE FOR ANIMALS~~

SMITH-PETA 0489

SIXTH ANNUAL ANIMAL RIGHTS SYMPOSIUM

FEATURED SPEAKERS:  
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CAROL ADAMS - RIVER PHOENIX - COLMAN MCCARTHY - TOM REGAN  
INGRID NEWKIRK - MICHAEL W. FOX - MICHAEL KLAPER - HOLLY HAZARD

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MAYBE WE SHOULD GET MEMBERS OF PUTTING PEOPLE FIRST TO ATTEND ...  
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