

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY LOWE,

LAUREN LOWE,

GREATER WYNNEWOOD EXOTIC ANIMAL
PARK, LLC, and

TIGER KING, LLC,

Defendants.

Case No. 20-cv-423-JFH

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

Plaintiff, United States of America, by authority of the Attorney General of the United States and through its undersigned attorneys, files this Complaint and alleges as follows:

INTRODUCTION

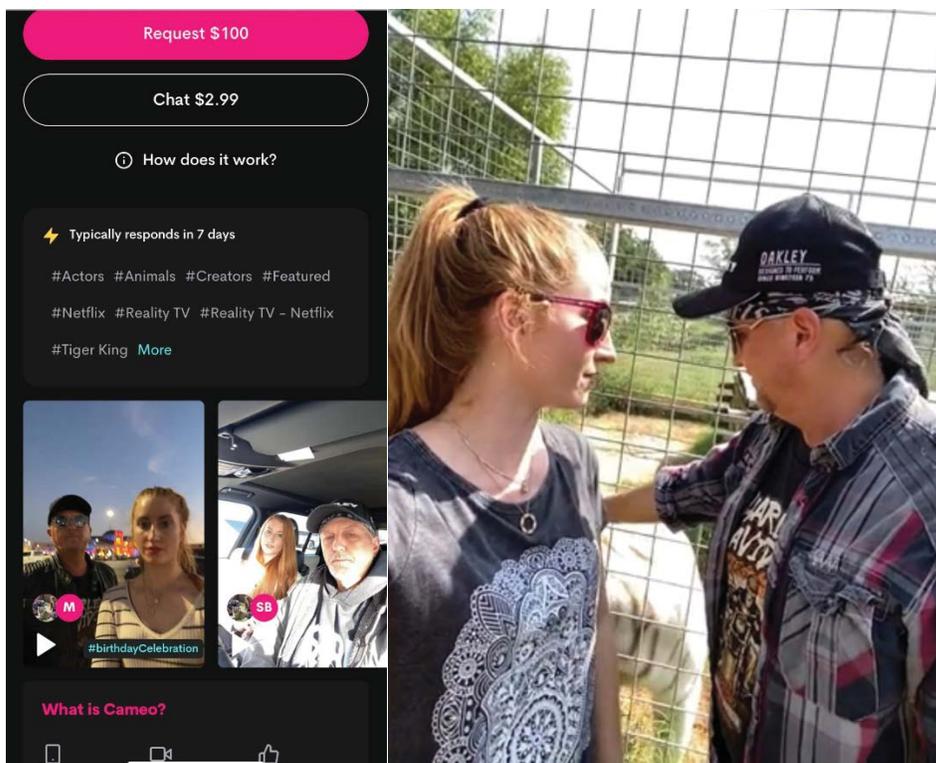
1. This is a civil action against Jeffrey Lowe, Lauren Lowe, Greater Wynnewood Exotic Animal Park, LLC (“GWEAP LLC”), and Tiger King, LLC (together “Defendants”) for violations of section 9 of the Endangered Species Act (“ESA”), 16 U.S.C. § 1538(a)(1), (g), and violations of the Animal Welfare Act (“AWA”), 7 U.S.C. §§ 2134, 2159.

2. In January 2018, Jeffrey Lowe claimed to have “learned a lot about distracting, diverting attention, & using smoke and mirrors in the last few years.” Lowe has said, “If we lose a lawsuit, we simply change the name and open another animal business someplace else, we all have multiple USDA licenses available.” U.S. Department of Agriculture (“USDA”)-APHIS-Animal Care Animal Welfare Complaint No. AC18-426, at 197 (May 18, 2018).

3. To avoid federal investigation and inspection, Defendants have unlawfully established an unlicensed exhibition facility on an approximately 33-acre parcel of land in Thackerville, Oklahoma. (See photo below). The Lowes have dubbed the facility “Tiger King Park.”

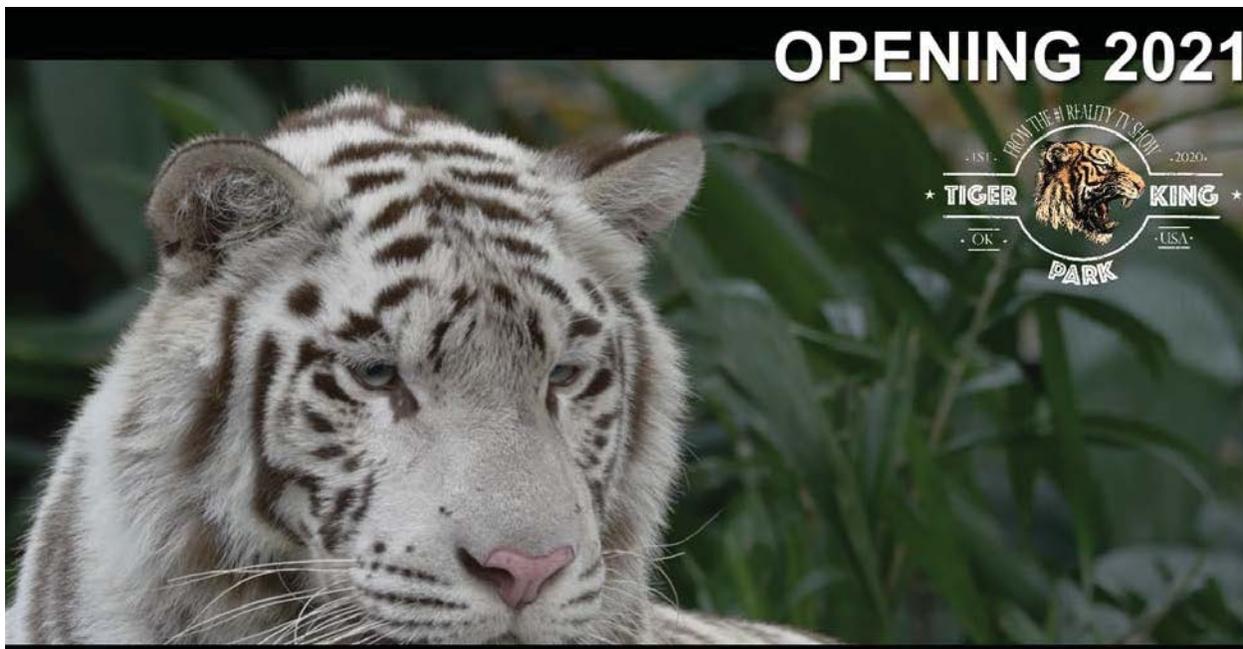


4. Upon information and belief, the Lowes have granted film crews access to this facility. In public statements, including on the Internet, the Lowes have declared that the facility will operate for the foreseeable future as a film set for exhibiting Tiger King-related content. Upon information and belief, Tiger King programming has been and will be available to the public through the paid subscription service Netflix®. The Lowes are also exhibiting animals in “shout out” videos made available to members of the public for a fee on the video-sharing platform, Cameo. (See photos below).



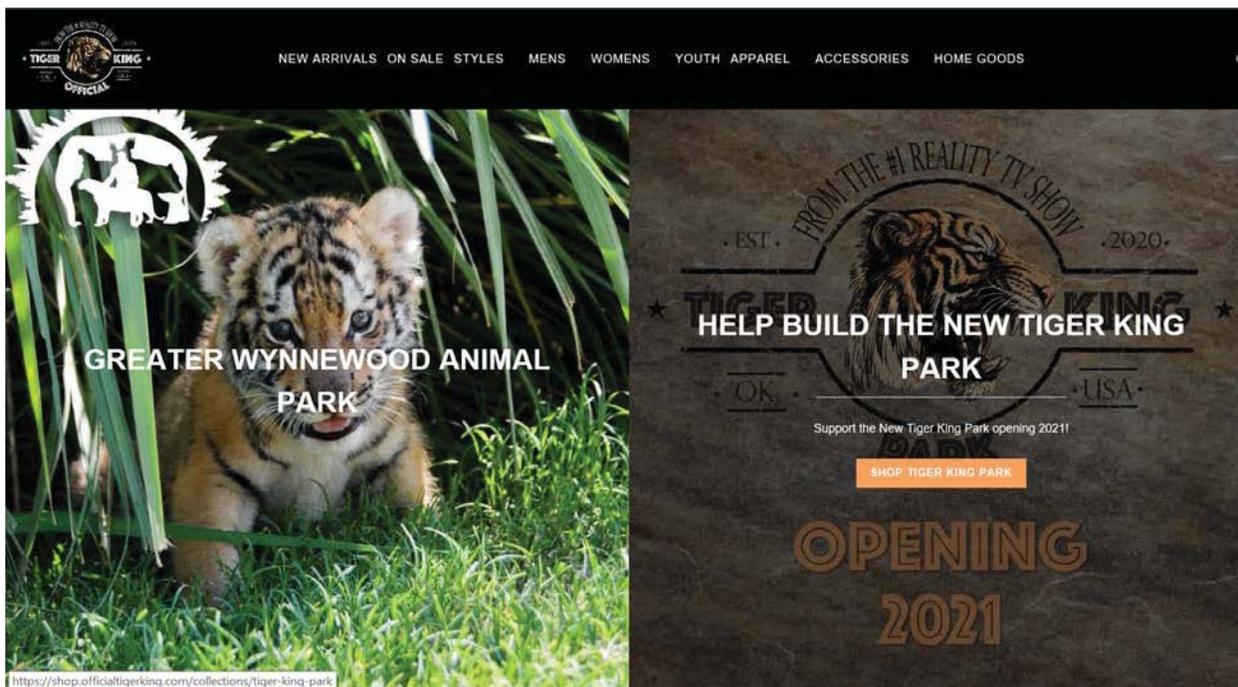
5. Lauren Lowe also exhibits animals, including lions and tigers, on the paid subscription online platform “OnlyFans” using the handle @tigerqueen_.

6. The Lowes also have advertised to the public their intent to open the new “Tiger King Park” for public exhibition. The Lowes maintain a website at <https://www.officialtigerking.com>. A link labeled “Animal Park” takes viewers to a page showing a white tiger, and stating:



7. Other webpages advertise Tiger King Park apparel and other merchandise for sale.

These webpages similarly exhort the public to purchase the merchandise to “HELP BUILD THE NEW TIGER KING PARK” and “Support the New Tiger King Park opening 2021!”



8. According to recent inspection records and other sources, the Lowes possess

approximately 100 to 200 ESA-protected animals. Upon information and belief, those animals are now housed at the Thackerville facility. This facility is located in the midst of an otherwise residential, rural area. While there could be more than 200 wild or exotic animals living at the site, the government has no information about the facility's provisions for water supply or waste disposal at the facility. Upon information and belief, there is no municipal water or sewer service at the facility.

9. Even when subject to federal inspection and oversight, the Lowes compiled a record of inadequate and inhumane treatment of animals, including ESA-protected animals.

10. Prior to August 21, 2020, Jeffrey Lowe individually held AWA license 73-C-0230. Jeffrey Lowe, together with Lauren Lowe and GWEAP LLC, exhibited numerous species of animals, including ESA-protected animals, at a roadside zoo in Wynnewood, Oklahoma: Greater Wynnewood Exotic Animal Park ("GWEAP" or "Wynnewood facility").

11. On August 14, 2020, USDA's Animal and Plant Health Inspection Service ("APHIS") suspended AWA license 73-C-0230. USDA then filed an administrative complaint seeking permanent revocation of that license on August 17, 2020.

12. On August 21, 2020, Jeffrey Lowe voluntarily terminated AWA license 73-C-0230. But the Lowes continue to exhibit animals without a required AWA exhibitor license and thereby attempt to avoid government investigation or inspection.

13. In violation of federal regulations for animal exhibitors, during the last two years, the Lowes and GWEAP LLC failed to employ an attending veterinarian and failed to provide timely and adequate veterinary care to the animals in their possession. The failure to have formal arrangements with an attending veterinarian, including a written program of veterinary care and regularly scheduled visits to the premises to ensure the health and well-being of the animals, has

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