

Devastating Deals:

How Groupon Rakes in Profits from Wild Animal Exploitation

Introduction

Wild animals are suffering in small, dilapidated cages in roadside zoos across the US. Frightened elephants, tiger cubs, and lemurs are used as photo props while dolphins are made to perform unnatural tricks in small tanks at marine amusement parks. But these venues aren't the only ones profiting from animal exploitation. Discount icon Groupon also profits when it features deals for captive wildlife venues on its website.

Groupon—a global e-commerce company that sells discounted deals on travel, activities, and services—boasts that it has more than 25 million active customers and has worked with more than one million companies. Groupon deals range from experiences like golfing or museum tours to goods, beauty, and dining. But lurking among these deals are tickets to roadside zoos, pseudosanctuaries, and marine amusement parks with long track records of animal suffering. Many of these venues also offer dangerous and cruel interactions with wild animals.

Fueling Wild Animal Exploitation

Groupon is not merely a passive participant. Groupon itself boasts that by using their platform, businesses can "expand their reach and bring on new customers." Their model appears to be working. Many reviews on travel sites noted that it was a Groupon deal that encouraged them to visit the venue:

- "First let me start off by saying that I found this place by searching things to do in my area on Groupon.

 This sanctuary came up with a good deal." (Suncoast Primate Sanctuary)³
- "I had a hard time deciding if I wanted to visit this park due to the very mixed reviews. I decided to go for
 it when there was a Groupon for the Seal Swim experience." (Miami Seaguarium)⁴
- "We found a great deal on Groupon that helped with cost." (SeaQuest Fort Worth)⁵
- "Can't beat their Groupon deal, \$13 for 2 people." (Everglades Outpost Wildlife Rescue)⁶

Groupon is creating demand for wild animal exploitation and then taking a cut of every deal purchased.

A survey of deals offered in the last five years reveals that Groupon routinely partners with some of the worst captive wildlife venues in the US. Below is a selection of those venues and a brief summary, offering a snapshot of the kind of cruelty being peddled on Groupon's website. Until Groupon adopts a meaningful public animal welfare policy that would not allow deals for exploitative attractions, these venues will have a platform to expand their customer base and increase profits.

A Note on Methodology

This report is not intended to provide a definitive list of US venues featured on Groupon, presently or historically. Groupon deals are time-limited and change frequently. Further, searches on Groupon are constrained by a geographic location (city, state) making it difficult to search by topic. Instead of attempting to catalog all deals for captive wildlife venues, researchers looked for venues with Animal Welfare Act (AWA) violations, litigation related to animal care or safety, animal and visitor injuries or deaths, and/or offer interactions with wild animals or wild animal performances.

Only venues with deals offered within the last five years (2016-2022) were considered. See "Past and Present Wild Animal Exploitation on Groupon" for other venues that Groupon has partnered with outside of this timeframe.

In other words, the eight venues listed here are only the tip of the iceberg.

Terms Used

Roadside Zoos

"Roadside zoos" generally refer to smaller captive wildlife venues where animals are usually kept in small, barren cages with little enrichment. Veterinary care is inconsistent or inadequate. The food may be moldy or inappropriate for the species, and animals may be confined alone—even highly social animals like nonhuman primates. Roadside zoos are likely to sell interactions between animals and visitors, such as cub petting or swimming with otters.⁷

Pseudosanctuaries

Some roadside zoos brand themselves as sanctuaries or refuges in an attempt to mislead visitors in order to increase ticket sales. But true sanctuaries do not (1) allow unescorted public visitation of wild animals, (2) engage in captive breeding (unless the organization is participating in a legitimate reintroduction program), (3) purchase animals, (4) or allow contact between wild animals and guests.⁸

Instead, true sanctuaries strive to replicate the freedom that a wild animal experiences in their wild home. Animal carenot entertainment—is at the forefront. For example, at the PAWS sanctuaries in California, elephants have acres of natural terrain to explore and lakes to bathe in. At The Wild Animal Sanctuary in Colorado, lions and bears roam more than 10,000 acres of rocks, grasses, and canyons. Sanctuaries accredited by the Global Federation of Animal Sanctuaries, which sets detailed care and operations requirements, represent the best available standard of sanctuary care in the US.°

Cruel Interactions with Wild Animals

Venues that offer interactions with captive wild animals use a variety of terms from "experiences" to "encounters" to "meet-and-greets." Key examples of interactions include handfeeding, touching, holding, bathing, taking photos with, and swimming with wild animals. While the venues in this report use a range of wild animals in interactions, otters, sloths, nonhuman primates, elephants, capybaras, coatimundis, penguins, dolphins, alligators, and big cats feature prominently.

Often, to enable these types of interactions, animals are restrained, coerced through abusive training, or enclosed in such a small space that they do not have a choice about whether to participate.

- Forcing wild animals to engage with humans, stripping them of the freedom to retreat, can be highly stressful
 and causes suffering.^{10, 11, 12}
- For some species, such as big cats and alligators, interactions primarily occur during a short period of time while the animal is young. Venues must maintain a stream of babies to continue to sell interactions. Animals quickly age out and are discarded (sold or sometimes killed) when they're no longer profitable.
- Interactions can be extremely dangerous for both animals and humans. Despite these risks, venues often promote interactions specifically to young children.



Most of the images in this report represent typical conditions for venues where animals are used for entertainment. Unless stated otherwise, they were not taken at the listed venues.

The Animal Welfare Act: A Weak Law with Weaker Enforcement

The Animal Welfare Act (AWA) is the primary federal animal protection law in the United States. It is administered by the US Department of Agriculture (USDA). The law regulates animals used in exhibition (like circuses and zoos) and research, as well as some commercial transporters and animal breeders, such as puppy mill operators. Unfortunately, the law sets only minimal care standards for animals, is chronically underenforced, and excludes species such as reptiles and amphibians. ¹³ Enforcement has plummeted in recent years, with USDA employees charged with inspecting venues told to treat facilities "more as partners than as potential offenders" which has reduced their ability to document violations. ^{14,15}

In the absence of meaningful enforcement of the AWA, Groupon's promotion of these venues is particularly pernicious. More than ever, US tourists are relying on travel companies to be good stewards of ethical wildlife tourism.

"It feels like your hands are tied behind your back. You can't do many things you're supposed to when it comes to protecting animals. You're seeing inspectors so frustrated they're walking out the door."

- Denise Sofranko, veterinarian who spent 20 years as a USDA inspector¹⁶

The Captive Wildlife Venues

The following captive wildlife venues include pseudosanctuaries, roadside zoos, and petting zoos—almost all of which offer cruel interactions between visitors and animals. Most have significant AWA violations, as well as documented animal deaths, injuries, illnesses, and public safety incidents. All of them have used Groupon to sell tickets in the last five years.

Tiger Creek Animal Sanctuary

(also known as National Foundation for Rescued Animals/Great Cats in Crisis) (Tyler, Texas)¹⁷

Pseudosanctuary with history of big cat suffering and deaths:

- Nine lions and tigers have died at Tiger Creek since 2018¹⁸
- Lawsuit filed in March 2022 against Tiger Creek for alleged violations of the Endangered Species Act¹⁹
- Acquired tigers from Doc Antle's (of "Tiger King" fame) facility in South Carolina²⁰

Tiger Creek Animal Sanctuary is a pseudosanctuary in East Texas that primarily houses big cats. In the last few years, Tiger Creek has racked up AWA violations for issues related to animal care, failure to have an environment enhancement program adequate to promote the psychological well-being of nonhuman primates, missing animal records, and poor sanitation.²¹ In December 2021, the USDA issued an official warning notice for alleged failure to provide adequate veterinary care.²²



Nine lions and tigers have died since 2018, including:

- Juda, an 18-year-old male lion, was noted to be "thin, to have muscle atrophy in his rear legs and
 was wobbly" during a January 2018 USDA inspection. He was euthanized in July 2018 without any
 documentation that a veterinarian examined him in the intervening seven months.
- Scrunches, a 17-year-old female lion, experienced vomiting and nausea in August 2018. On January 9, 2019, she was noted to be dragging herself around her enclosure. A veterinarian was consulted via phone, but Scrunches was not examined until she was euthanized on January 23, 2019.
- Greg, a 19-year-old tiger, was noted to have a distended abdomen (a swollen stomach) on September 18, 2018, and had not eaten normally for several weeks. He was euthanized on October 2, 2018, without any records of being examined by a veterinarian during this period.
- Sierra, a 19-year-old female tiger, was noted to appear "dizzy" in April 2018. She then experienced
 "multiple episodes of stumbling, back end [sic] weakness, and collapsing" before being euthanized in
 August 2018 without any record of being examined by a veterinarian during this period.²³

In 2022, the Animal Legal Defense Fund filed a lawsuit against Tiger Creek for alleged violations of the Endangered Species Act by "harming, harassing, and killing numerous animals" as well transferring endangered and threatened species across state lines without required permits.²⁴ Though Tiger Creek purports to be a refuge for big cats, USDA documents reveal it actually acquired tigers from Doc Antle of "Tiger King" fame.²⁵ Doc Antle, owner of Myrtle Beach Safari in South Carolina, was indicted in October 2020 for felony wildlife trafficking and misdemeanor animal cruelty.²⁶

Miami Seaguarium (Miami, FL)²⁷

Marine amusement park with numerous AWA violations and animal deaths:

- Tokitae (also known as Lolita), a female orca, is held without orca companionship in what is reportedly the smallest tank in the world.²⁸
- Runs daily dolphin and sea lion performances and offers swimming with dolphins and seals, as well as penguin and dolphin encounters.
- Five dolphins and an infant sea lion died between 2019 and 2020, including Indigo, a bottlenose dolphin, who was found dead at the bottom of a tank from acute trauma and pulmonary shock.²⁹

The Miami Seaquarium (MSQ) is a marine amusement park with a laundry list of AWA violations for issues including inadequate veterinary care, structurally unsound facilities, and inappropriate housing of marine mammals that resulted in injuries and deaths.

Tokitae

MSQ has held Tokitae, a 56-year-old female orca, in what is reportedly the smallest tank in the world and used her in performances for more than 50 years.³⁰ Her 80-by-35-foot tank is radically smaller than the 140 miles that an orca can swim in the wild in a single day.³¹

Tokitae was captured from her home—and separated from her family—in the Pacific Northwest in 1970. She has not seen another orca since her tankmate Hugo died in 1980. Hugo died after intentionally smashing his head repeatedly into the tank walls. Orcas are intensely social animals who maintain lifelong family bonds, with some families remaining within a 2.5-mile radius of each other for their entire lives.³² Tokitae has since been housed with Pacific white-sided dolphins who have routinely attacked, harassed, chased, and raked her with their teeth.³³ Tokitae has also hurt marine mammals placed in her tank, likely causing the death of Catalina, a 31-year-old dolphin.³⁴

For years, advocates have campaigned for Tokitae to be relocated to a seaside sanctuary. When MSQ was acquired by The Dolphin Company in 2021, the USDA granted their AWA license under the stipulation that Tokitae and the dolphin confined with her, Lii, would not be exhibited.³⁵ Though no longer used in performances, as of spring 2022, her fate remains unknown.



"Thirty-five feet. She's 20 feet long. And she's lived there for 50 years. It's ridiculous."

- Naomi Rose, Ph.D., marine mammal scientist³⁶

AWA Violations and Animal Deaths

In June of 2021, the USDA filed a 17-page inspection report citing the facility for myriad violations of the AWA. In the report, the USDA notes that the facility's attending veterinarian's recommendations regarding animal care have been "repeatedly disregarded or dismissed."³⁷

Among the violations:

- MSQ's trainer ignored the veterinarian's instructions not to make Tokitae perform certain tricks in performances, such as fast swims and "head in entry" jumps. Tokitae's mandible was injured during these fast swims.
- MSQ reduced Tokitae's diet and fed her and other marine mammals "poor quality" and badsmelling fish against veterinary advice. Animals developed inflammation, lesions, and one dolphin required antibiotics to prevent further illness caused by the fish.
- Various tanks and surrounding structures were
 in states of disrepair. Sections of the fencing
 between two tanks were held together only with zip-ties, allowing two dolphins to break into another pool and
 seriously injure a medically fragile dolphin, breaking at least four of her ribs.
- MSQ failed to provide sufficient shade to protect marine mammals from direct sunlight. Multiple bottlenose dolphins, Tokitae, and Lii had eye lesions, a painful condition.

- MSQ kept animals in tanks with perilously high levels of chlorine and parasites, sickening and injuring Tokitae, manatees, and dolphins.
- MSQ housed incompatible animals together resulting in injuries and deaths, including:
 - Abaco, a bottlenose dolphin, who was found dead at the bottom of the tank after his rostrum became stuck in the fence. His necropsy revealed he also had injuries from being attacked.
 - Indigo, a bottlenose dolphin, was found dead from acute trauma and pulmonary shock after "interactions" with other dolphins.
 - Echo, a bottlenose dolphin, was found dead after suffering acute neck trauma following a dolphin attack.

Zoological Wildlife Foundation (Miami, FL)38

Roadside zoo owned by Mario Tabraue of "Tiger King" fame that offers extensive interactions with big cats and other wild animals:

- Chronic AWA violations such as failure to provide adequate veterinary care, handle animals properly, maintain a plan for the psychological well-being of nonhuman primates, keep enclosures in good repair.³⁹
- Sells interactions with big cat cubs and nonhuman primates, sometimes for hundreds of dollars for a few minutes. Interactions have resulted in bites and injuries.⁴⁰
- After using Limbani, a juvenile chimpanzee, in interactions, ZWF continues to dress him in costume and make him perform human activities like driving—grossly jeopardizing his development and safety.

The Zoological Wildlife Foundation claims it is "educating the public about rare and endangered animal species in captivity and in the wild."⁴¹ In reality, it's a roadside zoo that fails to meet even the minimal requirements of the AWA and sells interactions with wild animals.

Owner Mario Tabraue, featured in "Tiger King," used wild animal sales (and wildlife trafficking) as a cover for his massive drug empire. He founded Zoological Wildlife Foundation (then known as Zoological Imports 2000 Inc.) after his release from prison in 2000.⁴² In 2009, he admitted to making false and fraudulent statements and creating and providing fraudulent documents to the USDA regarding the acquisition of several tigers. ⁴³

Public Safety

The facility has a lengthy list of safety issues, such as:

- A guest was bitten by a lion cub during an interaction, and photographs of a guest petting a juvenile lion over 16 weeks old were uploaded to social media. ZWF received two critical violations from the USDA for these incidents (July 2021).⁴⁴
- The Florida Fish and Wildlife Conservation Commission issued a warning after a chimpanzee bit a child (2020).⁴⁵
- A volunteer was bitten by a capuchin monkey (2017).⁴⁶
- A review on TripAdvisor states that the reviewer's daughter was bitten by a tiger cub and required three stitches. A response from ZWF states that they are "apologetic" for the incident (2017).⁴⁷
- A tiger bit off a man's thumb after he put his hand in the tiger's cage (2014).⁴⁸

Poor Care for Nonhuman Primates

The USDA has cited the facility for violations related to the care and psychological well-being of nonhuman primates housed at ZWF, including for:

- Failure to have a plan for environment enhancement adequate to promote the psychological well-being of nonhuman primates. The inspection also notes that the attending veterinarian "was not satisfied with the facility's implementation of the current enrichment program for nonhuman primates" (2021).⁴⁹
- Failure to provide adequate veterinary care after a female macaque was bitten by a male macaque. The
 female macaque had bleeding wounds on her left arm and face. The male macaque had a laceration on his
 jaw (2015).⁵⁰
- Housing three nonhuman primates singly without sufficient environmental enrichment—the report noted "very little enrichment was being provided" (2015).⁵¹

Cruel Interactions: Cub Petting and Chimpanzees

Though many US captive wildlife venues offer interactions with a variety of wild animals, interactions with big cat cubs and chimpanzees are increasingly rare in the US. ZWF is one of the remaining venues that sells them. Review sites and social media are filled with photos of guests posing with wild animals including big cat cubs, monkeys, and lemurs, as well as a young chimpanzee named Limbani.^{52,53}

Netflix sensation "Tiger King," and the subsequent media storm, revealed the abuse underpinning the big cat cub petting industry. Because big cats can only be used in interactions until they're 12 weeks old, they are continually bred in order to supply new cubs. Cubs are prematurely weaned and forcibly separated from their mothers. Some die, and those who survive are usually sold or killed when they're deemed too old for interactions.⁵⁴

In addition to cub petting, ZWF sold encounters with Limbani when he was young and still continues to dress him in costumes and pose him in staged photoshoots, including him "driving" a car, hugging a dog, and sitting under a Christmas tree. 55, 56 These photos and videos are then pushed out on social media, garnering millions of "likes" and shares. 57

Treating Limbani like a human child grossly jeopardizes his development and endangers his safety, as well as the safety of those around him.⁵⁸ Chimpanzees raised in isolation from other chimps experience substantial difficulties later in life and exhibit abnormal social behavior patterns.^{59, 60} Further, these kinds of portrayals lead people to believe chimpanzees are not endangered and undercut conservation efforts.⁶¹ It also wrongly suggests to the public that chimpanzees can be domesticated or safely handled.⁶²

"When chimps are forced to only hang around people, it becomes a disaster.

If and when something happens, he'll [Limbani] be put in further isolation which would only continue to negatively impact him psychologically."

 Andrew Halloran, care director for Save the Chimps, a sanctuary accredited by the Global Federation of Animal Sanctuaries⁶³



The abusive cub petting industry churns out and discards big cats once they reach roughly 12 weeks old and are too big to use in interactions.

<u>SeaQuest</u> (<u>locations in California, Colorado, Connecticut, Georgia, Minnesota, New Jersey, Nevada, Texas, Utah, and Virginia</u>)⁶⁴

A chain of "interactive" aquariums/petting zoos with a litany of AWA violations, animal deaths, and human injuries:

- Animals have been drowned, kicked, crushed, and burned to death while SeaQuest does nothing to change its practices.⁶⁵
- AWA violations include animal deaths, guest and employee injuries, incomplete and missing animal records, and unsanitary conditions.⁶⁶
- Ben, a wallaby, and Jelly, an otter, both drowned at different SeaQuest locations.^{67, 68}

SeaQuest is a national chain of "interactive" aquariums with a prolific record of legal violations in areas ranging from animal care to public safety despite being founded only six years ago in 2016. It largely operates out of malls, keeping wild animals in small indoor tanks and cages. Asian small-clawed otters, who live in the coastal swamps of Asia, and sloths, tree-dwelling animals who live in the tropical rainforests of Central and South America, are exhibited between Taco Bells and Gap stores and made to entertain crowds of children.

Legal Troubles

Owner Vince Covino has a history of poor animal care and legal troubles that predate SeaQuest's existence. Vince opened the now-shuttered Portland Aquarium with his brother, Ammon Covino, in 2012. The following year, The Oregonian published an exposé documenting the deaths of 200 marine animals over just three months at the Portland Aquarium.⁶⁹ Animals including bamboo sharks, crabs, fish, and garden eels died "from starvation, infection, high temperatures, animal-on-animal attacks" as well as unknown causes. A few months later, Ammon was sentenced to a year in prison for illegally trafficking spotted eagle rays and lemon sharks for his aquarium in Idaho.⁷⁰ In 2016, Ammon was sent back to prison for eight months for assisting Vince in opening SeaQuest locations in Nevada and Utah, a violation of his probation.⁷¹

SeaQuest has had continual run-ins with state and county agencies.

- The New Jersey Department of Environmental Protection issued a written warning to SeaQuest Woodbridge for violations including posting photos of children holding animals not registered with the state and a photo of a child near a sloth (classified as a "potentially dangerous animal" in New Jersey), as well as failing to file health certificates for new animals (2021).⁷²
- Clark County Animal Control stated it would not authorize future permits for sloths after two sloths died at SeaQuest Las Vegas.⁷³ The county also cited and fined the same facility for illegally breeding Asian small-clawed otters (2021/2019).⁷⁴
- The Colorado Department of Parks and Wildlife suspended SeaQuest Littleton's state zoological parks license for repeated failure to comply with license requirements (2019).⁷⁵
- The Colorado Department of Agriculture issued a cease-and-desist order after SeaQuest Littleton exhibited more than 100 birds without a license (2018).⁷⁶

"Oftentimes because they let people walk around, the kids would stomp on the birds and kill them. And then they would throw the birds in the garbage so they didn't have to record it or show that the birds were dead."

- former SeaQuest employee Marc Heller⁷⁷

Animal Injuries and Deaths

Multiple animals have died at SeaQuest locations. Based on employee accounts and the AWA's exclusion of reptiles, fishes, and birds, the actual number of animal deaths is likely much higher.⁷⁸ Documented deaths and injuries include:

- A flying squirrel was crushed to death in a door after an interaction with a guest (SeaQuest Woodbridge, 2021).⁷⁹
- Two sloths, both named Flash, died at the same location within a nine-month period after exhibiting weakness, twitching, and diminished appetite (SeaQuest Las Vegas, 2020/2021).
- Ben, a wallaby, drowned after falling into a tank at the back of the enclosure. Though the tank had stairs leading into the water, there were no stairs leading out (SeaQuest Littleton, 2020).⁸¹
- A 2019 investigation from ABC 13 KTNV Las Vegas into SeaQuest Las Vegas revealed:
 - Children stomping birds to death (and employees throwing the bodies into the trash to avoid recording their deaths).
 - o Turtles crushed to death by children.
 - O An octopus cooked alive and burned to death overnight in a tank.
 - A dead turtle left to rot for days.⁸²
- Jelly, an otter, drowned after her arm was trapped in a filtration system in a tank (SeaQuest Las Vegas, 2018).⁸³
- An unnamed otter who likely died due to the stress of shipping and caging (SeaQuest Las Vegas, 2018).

- A third sloth named Flash was burned twice by a heating lamp. After the first burn, the heating lamp was not
 moved or covered. Flash was burned again a month later, resulting in injuries that caused him to visibly wince
 while attempting to eat. The attending veterinarian was not contacted for either burn, despite staff telling
 county investigators otherwise (SeaQuest Littleton, 2018).⁸⁵
- In a single summer, a guest kicked five birds to death, and two kookaburras died, one drowned in a water bowl while the other likely choked on a toy (SeaQuest Littleton, 2018).⁸⁶
- A capybara escaped while being transported in a dog carrier in an open-bed pickup truck and was badly injured (SeaQuest Las Vegas, 2018).⁸⁷



A fish tank caked in scum, documented by a visitor to SeaQuest Woodbridge, February 2022.



A guest at SeaQuest Folsom in August 2021 noted that the rabbit enclosure was filthy and filled with flies.

Public Safety

SeaQuest has a slew of public safety incidents at various locations, such as:

- Guests were bitten by a kinkajou (a small mammal in the family Procyonidae, which also includes raccoons) and an Asian small-clawed otter (SeaQuest Utah, 2021).88
- An adult and child were bitten by a sloth and capybara (SeaQuest Fort Worth, 2020/2021).
- A small child was bitten by an otter during a feeding demonstration (SeaQuest Trumbull, 2020).
- A guest and employee were bitten by Gus, a coatimundi. The following month, Gus bit another guest and employee (SeaQuest Utah, 2019).91
- SeaQuest Littleton disclosed at least 30 injuries to employees and guests between June 2018 and January 2019, including:
 - A woman who touched a puffer fish and later called 911 for numbness and trouble breathing.
 - A stingray barb became caught in a person's hand.
 - o A Burmese python latched onto someone's hand.
 - A sloth bite.
 - Iguana, tortoise, and shark bites.^{92,93}

A former employee revealed to 13 KTNV Las Vegas that SeaQuest withholds food to induce animals to interact with guests who pay to feed them, resulting in guest injuries, stating, "Coati[mundis] have bitten kids. I've seen two to three that have actually broken skin. We've had capybaras chewing holes through clothes. The lorikeets would get super food-aggressive and go and bite ears and necks and sometimes they broke skin" (2019).94

Everglades Outpost Wildlife Rescue (Homestead, Florida)⁹⁵

Pseudosanctuary that peddles cruel alligator shows and encounters:

- Visitors pay to pose with baby alligators whose mouths are taped shut. 96, 97
- Runs shows where employees carry, drag, and manipulate alligators' bodies. 98, 99

Everglades Outpost Wildlife Rescue describes itself as an educational wildlife rescue and rehabilitation center, but dangerous interactions and shows featuring alligators are the primary attraction.

Alligator Interactions

- Photos on review sites depict visitors, including children, holding juvenile alligators with their mouths taped shut, giving the animals no opportunity to retreat.^{100, 101} At least one photo shows an elementary school-aged child sitting on an older alligator.¹⁰²
- Guests can also book an "underwater alligator encounter" through a third-party that uses Everglades Outpost's facilities and animals.¹⁰³ Swimmers are separated only by a net.



Alligator Performances

The facility also offers alligator shows where staff and volunteers manipulate and control alligators' bodies. A volunteer boasted in an ABC News article about how she "gets in the water with them, feeds them raw meat, climbs on their backs and wrestles them." 104

Guest photos of shows depict:

- Alligators being draped over employees' shoulders. 105, 106
- Employees putting their chins in alligators' mouths. 107, 108, 109
- Employees dragging alligators by their tails. 110, 111

One review describing the show noted that "they [staff] swim, carry, and kiss Casper [an alligator]."112

Despite common misperceptions, reptiles are intelligent animals who experience emotions like pleasure and anxiety.
Tying alligators' jaws shut and manually restraining them causes acute stress.
One study determined that physical restraint was more stressful for crocodiles than stun guns, taking up to eight hours for blood stress levels to lower after being restrained between two and 15 minutes.
Like all wild animals, alligators need the freedom to explore and choose who they interact with on their own terms in order to thrive.

Everglades Outpost's website states they provide educational opportunities for schools and civic groups.¹¹⁶ But using alligators as props in performances and allowing guests to hold them sends a risky message. Instead of teaching visitors that alligators are powerful animals who prefer to avoid contact and can easily kill humans, Everglades Outpost sends the false message that alligators can be safely and humanely handled.

This is particularly hazardous considering Everglades Outpost operates in Florida where thousands of alligators are reported as "nuisances" every year and subsequently killed because of humans' failure to take appropriate steps to coexist with these animals.¹¹⁷ Ironically, Everglades Outpost claims to be alleviating this problem by accepting "nuisance" alligators—instead, it's perpetuating the problem.

Oklahoma Awesome Adventures/Endangered Ark Foundation (Hugo, Oklahoma) 118

Oklahoma Awesome Adventures offers cruel interactions with elephants held at Endangered Ark Foundation, a pseudosanctuary founded by the Carson & Barnes Circus:

- Elephants are forced to engage in interactions such as delivering breakfast, receiving "pedicures," and being bathed.
- Carson & Barnes has a history of significant public safety incidents and poor animal care. 119, 120
- According to court records, in 2021, a woman visiting Endangered Ark allegedly sustained "serious and life-threatening injuries" from an adult elephant while participating in an "elephant experience" facilitated by Oklahoma Awesome Adventures.¹²¹

While the Endangered Ark Foundation describes itself as a "retirement ranch for circus elephants," the elephants held there are far from retired. Instead, they continue to be bred for use in entertainment and are used to sell expensive interactions. The Carson & Barnes Circus established Endangered Ark in 1993, and though Endangered Ark attempts to distance itself from the circus in the media, the same group of people apparently operate both. 122, 123

Carson & Barnes has been frequently cited and fined by the USDA for AWA violations, including:

- Using a bullhook with "excessive force" on an elephant.
- Failure to provide veterinary care.
- Failure to handle elephants safely or maintain control of elephants.
- Failure to provide animals with sufficient shelter and minimum space. 124, 125





Visitor interactions with elephants are inherently dangerous and abusive.

Public Safety

Visitor interactions with elephants are inherently dangerous and abusive. The few venues in the US that still sell up-close interactions with elephants rely on the "free contact method" to control elephants' movements. In "free contact," there are no barriers between the elephant and human. Conversely, "protected contact" relies on a barrier, and positive training is used when procedures such as a veterinary examination require closer interaction. The Association of Zoos and Aquariums (AZA) banned most free contact between zookeepers and elephants in 2011 following a series of deaths. ¹²⁶ Free contact "is based on dominance and fear of physical punishment." ¹²⁷ The primary tool used in free contact is the bullhook, a fireplace poker-like device with a metal hook and point, that elephants learn to associate with pain. ¹²⁸

Bullhooks

Bullhooks (also called a "guide" or ankus) are used on the most sensitive parts of an elephant's body, such as around their feet, under the chin, and behind their ears. They can cause lacerations and bruises. Recognizing the considerable physical and psychological suffering that bullhooks inflict on elephants, dozens of cities and several states have banned their use. In 2019, the AZA voted to prohibit bullhooks.¹²⁹

Underscoring the serious risks of human-elephant interactions, the USDA's Animal Welfare Inspection Guide states that "all elephants have the potential to be dangerous" and actually instructs federal employees inspecting facilities with elephants to stay back "a minimum of 8 feet, even if the elephant is chained or behind a barrier" to help ensure their safety.¹³⁰

Yet photos on Endangered Ark and Oklahoma Awesome Adventures' websites, as well as travel review sites, show visitors, <u>including children</u>, interacting closely with elephants. Activities include:

- Posing next to elephants for photos. 131
- Touching and filing an elephant's feet and nails while the elephant is made to prop their foot on a stool.¹³²
- Bathing elephants. 133, 134, 135
- Elephants bringing breakfast to guests. 136
- Elephants being made to engage in tricks including painting, playing the harmonica, and performing "yoga" poses.^{137, 138}



Public Safety Incidents:

- A woman who visited Endangered Ark Foundation in 2021 alleges she sustained "serious and life-threatening injuries" from an adult elephant while participating in an "elephant experience" facilitated by Oklahoma Awesome Adventures. In the lawsuit pending against Endangered Ark Foundation, Oklahoma Awesome Adventures, and Carson & Barnes, the woman asserts that she "has been temporarily and permanently disabled; and has been permanently disfigured." 139
- Endangered Ark leased two elephants, Rosie and Opal, to a facility in Maine. The elephants were subsequently involved in the crushing death of James Laurita in 2014. Laurita previously worked as an elephant handler for Carson & Barnes.¹⁴⁰
- In 2016, the USDA fined Carson & Barnes \$16,000 for failure to safely handle elephants after it lost control
 of three elephants during a performance.¹⁴¹

At the time of publication, Endangered Ark is lobbying the Oklahoma Legislature to enact a law enshrining its ability to continue to use free contact and bullhooks. Rep. Justin Humphrey, whose district covers Endangered Ark, filed the "Endangered Ark Foundation Preservation Act," HB 3281, in 2022. The bill states the use of "free contact," including bullhooks, by nonprofits are not considered animal cruelty under Oklahoma law.¹⁴²

Cruel Interactions and Breeding Elephants for Entertainment

As understanding of the devastating impacts of captivity on elephants grew, US zoos began closing or announcing their intention to close their elephant exhibits in the early 2000s. Detroit Zoo was the first major American zoo to close its exhibit "on ethical grounds" in 2004. 143

- Physical Impacts: An analysis of 390 elephant deaths at AZA-accredited zoos for the past 50 years
 determined "most of the elephants died from injury or disease linked to conditions of their captivity, from
 chronic foot problems caused by standing on hard surfaces to musculoskeletal disorders from inactivity
 caused by being penned or chained for days and weeks at a time." Half of the deaths occurred by the age
 of 23, a fraction of an elephant's lifespan in the wild.
- Psychological Impacts: Elephants in the wild engage in "critical decision-making, fluid social interactions with family members and mates, navigation in an ever-changing environment, and free agency." ¹⁴⁵ Deprived of these dynamic experiences, all elephants in captivity experience some degree of psychological suffering.

Despite the growing consensus that elephants cannot thrive in captivity, Endangered Ark continues to breed elephants for entertainment.¹⁴⁶ And unlike a true sanctuary that strives to meet the physical and psychological needs of elephants as much as possible in captivity, Endangered Ark does the opposite. Making elephants engage in unnatural activities, like posing for photos or holding their foot up for nail filing by untrained guests, often requires intensive, abusive training and the use of bullhooks, even for tasks that might seem benign, like painting. These elephants are denied the ability to express natural behavior and stripped of their bodily integrity.

"What is taken for obedience in elephants is 'often only dread; and a sense of helplessness learned from punishments and restrictions."

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- David Hancocks, "Most Zoos Do Not Deserve Elephants"

Suncoast Primate Sanctuary (Palm Harbor, Florida)¹⁴⁸

Pseudosanctuary where dozens of nonhuman primates are housed in barren cages:

- Portrays itself as a refuge for nonhuman primates but the facility lost its AWA license and later rebranded as a sanctuary.¹⁴⁹
- In 2010, a volunteer was badly bitten by a chimpanzee. She broke her thumb and tendons in her other fingers.
 The volunteer spent \$70,000 in unreimbursed medical costs. The facility still did not have liability insurance as of 2016 despite hosting school groups and the public.¹⁵⁰

Previously "Noelle's Ark Chimp Farm," the Suncoast Primate Sanctuary is one of the rare facilities to have its AWA license revoked by the USDA.¹⁵¹ As noted earlier, the AWA is underenforced and violators generally receive a slap on the wrist, if that. The loss of an AWA license is an extraordinary measure.¹⁵² Suncoast Primate Sanctuary lost its license for violations including keeping animals in "rusty, small, dirty" cages with jagged edges, keeping incomplete animal records, improperly storing food and bedding, and "housing animals in uncomfortable conditions."¹⁵³

Nonhuman Primates Suffering

Though rebranded, troubling conditions persist. More than 60 nonhuman primates, including 12 chimpanzees and three orangutans as of 2020, still live in small cages with concrete floors. In contrast to the bleak enclosures at Suncoast, the Global Federation of Animal Sanctuaries recommends great ape housing provide adequate space, diverse and complex space, and "varied opportunities for the apes to interact with the environment and key elements [be] changed often, resulting in a dynamic living space." 154

Species-appropriate enrichment and socialization is critical to nonhuman primate well-being. Most nonhuman primate species are highly social, and all experience compromised welfare when unable to engage in normal behaviors, with some developing psychopathologies such as self-mutilation. 155, 156

"This is a very sad place to visit. The primates are in cages too small and their star attraction Pongo is the saddest orangutan you have ever seen. I wish someone would rescue him from this 'sanctuary'. [sic] He lives in a concrete cage that is [sic] no way resembles a jungle like his natural habitat."





Cruel Interactions

Suncoast does not sell interactions with nonhuman primates on its website. But guests can purchase food to drop into plastic tubes connected to the animals' enclosures. Additionally, Suncoast keeps alligators and uses their babies in encounters as well as offers an alligator show.

- Review sites feature photos of children holding snakes and juvenile alligators whose mouths are tightly bound with tape.^{158, 159}
- Though encounters with primates aren't sold on Suncoast's website, there is some evidence that visitors are
 interacting with primates—including a photo of a girl with a leashed lemur on her shoulder. ¹⁶⁰

Pseudosanctuaries

Suncoast Primate Sanctuary appears to engage in a tactic often used by pseudosanctuaries to excuse conditions that visitors find concerning. Pseudosanctuaries may state that they are "volunteerrun" or lack funding to defend themselves from critique, arguing that they are the animal's "last chance for survival" (as Suncoast Primate Sanctuary writes on its website). 161 Visitors don't realize that these pseudosanctuaries, in some cases, have actually refused to relinquish animals to accredited sanctuaries, despite the intervention of animal protection organizations.

Reviews of Suncoast Primate Sanctuary on both Groupon's website and other travel sites demonstrate this dynamic—visitors are not aware that alternatives exist, or that increased funding will not alleviate the problem. For example:



- A March 2022 reviewer wrote, "The gator crusader show was great. I feel bad for the Chimps, their pens are small and you can tell they are not happy. But if they truly cannot be turned loose in their native habitat then glad they are being taken care of here." 162
- Another recent reviewer wrote, "Five stars because this place needs more money. Please come here and/
 or donate. This is a place for primates that have nowhere else to go, so the facilities are sad. I felt that it was
 missing a fundamental educational aspect-[sic] for example, when my family and I visited Big Cat Rescue, the
 volunteers thoroughly explained why the cats were there, how they wish they didn't have to be, and how to
 help."163 Notably, Big Cat Rescue is a Global Federation of Animal Sanctuaries-accredited facility.

The amount of work and resources it can take to transfer and make space for even a single wild animal at an accredited sanctuary is considerable and should not be diminished. But true sanctuaries prioritize animal well-being above someone's desire to possess or exhibit animals.

<u>Debbie Dolittle's Animal Experience/City Goat Farm & Zoo Inc.</u> (also known as Debbie Dolittle's Indoor Petting Zoo, formerly Jozee Rooz Indoor Petting Zoo) (Tacoma, WA)¹⁶⁴

Petting zoo that offers wild animal interactions with a substantial number of public safety incidents and poor animal care:

- In less than a year, approximately 79 guests were injured during interactions with animals.¹⁶⁵
- AWA violations include failing to: demonstrate adequate experience and knowledge of species, provide structurally sound housing, provide complete inspection records, handle animals safely, among others.¹⁶⁶
- Both a sloth and a tamandua died due to the owner's lack of knowledge regarding their care.¹⁶⁷

Debbie Dolittle's operates an indoor petting zoo in Tacoma and an indoor/outdoor venue in Spanaway. In July 2021, the USDA fined Debbie Dolittle's (licensed under the name City Goat Farm & Zoo Inc.) \$7,500 for alleged animal care and safety violations. Shortly after, Donald Miller sold the indoor petting zoo to Malisa Cloud, apparently a former employee. Hough Cloud applied for a new AWA license, the two businesses continue to operate as one. The Debbie Dolittle's Animal Experience website and Facebook page sells and promotes interactions with animals including Asian small-clawed otters, African penguins, and sloths who are housed at City Goat Farm & Zoo Inc. without distinguishing between the two entities. 170, 171

Public Safety

- Approximately <u>79 guests</u> were injured during interactions with animals between April 2019 and February 2020. Incidents include:
 - A visitor bitten by a capybara and required medical treatment (December 2019).
 - At least two otter bites and at least one sloth bite (August 2019).





Otters are treated like photo props and used to sell interactions.

Animal Injuries and Deaths

- Malia, a young female sloth, died after reportedly falling from a climbing structure. The necropsy also found she was severely emaciated, and there was older bruising to her body "consistent with mishandling, neglect and ignorance of animal care" (October 2019).¹⁷³
- A young male tamandua died only three weeks after his arrival. The facility failed to quarantine or acclimate
 him to the environment, instead housing him in the busiest area of the petting zoo. Though the petting zoo
 knew he was losing weight, it kept no records, did not take him to a veterinarian, nor did they conduct a
 necropsy (June 2019).¹⁷⁴
- Peggy, a young female fennec fox, sustained a compound leg fracture due to structurally unsound housing.
 The fracture was so severe, her leg was amputated (May 2019). 175

Despite the deaths of the sloth and tamandua, and explicitly being told by the USDA that he lacks the knowledge required to care for these animals, Miller continues to obtain sloths, otters, and other animals. For example, at the time of publication, posts on the Debbie Dolittle Facebook page are encouraging people to buy interactions with a mother sloth and her new baby.¹⁷⁶

Malia, a young female sloth, fell to her death from a climbing structure. The necropsy determined she was severely emaciated, indicative of chronic stress, and found older bruising to her body. A USDA inspection report stated, "The results were found to be consistent with mishandling, neglect and ignorance of animal care."

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The Tip of the Iceberg: Past and Present Wild Animal Exploitation on Groupon

Groupon deals change constantly, but many past offers remain on the website. A review of historical deals reveals Groupon has done business with some of the most infamous wild animal exploiters in the US, including:

- G.W. Exotic Animal Park (The Garold Wayne Interactive Zoological Park) (Oklahoma) 178
 - Owned by "Tiger King" Joe Exotic (Joseph Maldonado-Passage), the G.W. Exotic Animal Park is the most notorious roadside zoo in US history. In addition to selling cub petting, Mr. Maldonado built a staggering record of animal cruelty and deaths. He bred and sold tigers and other big cats, kept animals in deplorable conditions, and is now serving a prison sentence for 17 counts of wildlife crimes (including killing tigers) as well as for two counts of murder for hire.¹⁷⁹
- Dade City's Wild Things (Florida)180
 - O Dade City's Wild Things was a cub-petting facility that was shut down following an Endangered Species Act lawsuit. The venue sold interactions where cubs were thrown into pools for "swimming encounters," and the owners engaged in breeding and trading tigers. In 2017, the facility transported 19 tigers to Joe Exotic's facility in July without air conditioning or water, in violation of a court order. A tiger gave birth during the trip and all three cubs died.¹⁸¹
- Two Tails Ranch (Florida)¹⁸²
 - Elephants are held at Two Tails ranch when they're not being used by the Tarzan Zerbini Circus. Run by Patricia Zerbini, it's one of the last venues that still offers elephant rides in the US. It also rents out elephants for events and forces them to perform tricks, sometimes in costume.¹⁸³
- Cricket Hollow Animal Park (Cricket Hollow Zoo) (Iowa)¹⁸⁴
 - Oricket Hollow closed after the Animal Legal Defense Fund won a lawsuit against the facility for chronic violations of state animal cruelty laws. Violations included keeping animals in cages with rotten food, feces, and dirty water and leaving the decomposing bodies of dead animals in cages with live animals. The owners are barred from possessing any wild animals in the future.¹⁸⁵
- Ringling Bros. and Barnum & Bailey Circus/Feld Entertainment (National) 186
 - Ringling folded in 2017 amidst intense political and public pressure regarding its treatment of animals, specifically elephants. Undercover videos documented Ringling trainers beating elephants, and multiple elephants died, including baby elephants at its breeding facility, before it closed.¹⁸⁷



Groupon Must End These Devasting Deals

As noted at the outset, many other exploitative venues are running deals on Groupon. The eight listed venues in this report represent a small fraction of the captive wildlife venues featured on the site. Examples of other venues that could have made this list include:

- East Texas Zoo & Gator Park (Texas) a roadside zoo that sells interactions with wild animals. In 2022, the Animal Legal Defense Fund filed a complaint with the USDA demanding owner Jason Clay's AWA license be revoked for repeated noncompliance.¹⁸⁸
- Wilstem Wildlife Park (Indiana) a roadside zoo/drive-thru safari that sells interactions with elephants. The
 USDA recently cited Wilstem after an employee killed a llama by dropping her into a hole and crushing her
 skull with an excavator bucket.¹⁸⁹
- Vision Quest Ranch/Monterey Zoo (California) a roadside zoo that sold interactions with elephants for years and was sued for using bullhooks in violation of California law.¹⁹⁰
- Chestatee Wildlife Preserve & Zoo (Georgia) a roadside zoo that housed a chimpanzee, Iris, in a small, dark room alone until she was transferred to an accredited sanctuary following an undercover investigation.

This list will only grow unless Groupon acts. Groupon must swiftly enact a comprehensive public animal welfare policy that safeguards animals and helps consumers make ethical, informed decisions about where to spend their money.



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