

2021 Louisiana High School Mock Trial Competition Case

Barry Jackson, on Behalf of the  
Minor Child, Charley Jackson

VS.

Grande City Zoo

A CIVIL CASE BY THE UNIVERSITY OF LOUISIANA-MONROE MOCK TRIAL TEAM  
CAMERON OTT   AAKRITI PANT   REBECCA PITTMAN

## **Synopsis**

On June 25, 2020, Charley Jackson, the 14-year-old child of plaintiff Barry Jackson, attended the Roaring Tigers Exhibition at Grande City Zoo in Grande City, Louisiana, which features live tigers. As part of the exhibition, patrons are allowed to pet the live tigers. The individual responsible for the exhibition and all tigers at Grande City Zoo is its employee, animal trainer Bo Aquatic. At approximately 2:42 p.m., Charley Jackson was mauled by Belai the Tiger and suffered physical injuries leading to the amputation of their right hand. Barry Jackson, on behalf of Charley Jackson, has filed suit against the Grande City Zoo, claiming their employee was negligent, and is seeking compensatory damages no less than \$500,000. Jackson claims that the Grande City Zoo breached their duty by failing to ensure that the selection of Belai the Tiger was reasonable and otherwise failing to take reasonable steps to ensure that the animal would not pose a danger to Plaintiff's child.

## Available Witnesses

### Plaintiff

- Charley Jackson, Victim
- Benny Borquet, Eyewitness
- Dr. Evanka Edwards, Tiger Expert

### Defense

- Bo Aquatic, Defendant
- Francis Goya, Eyewitness
- Dr. Gayle Noel, Animal Behavior Expert

## Exhibit List

1. Safety Guidelines for Belai's Tiger Show
2. KKP's Candy Bags
3. Photo of Belai's Harness
4. Map of Amphitheater
5. Frances Goya's Birthday Card

# **STIPULATIONS**

**CASE NO.: CR20-08-4893**

CHARLEY AND BARRY JACKSON

Plaintiff v.

GRANDE CITY ZOO

Defendant

- (1) For the convenience of the parties, witnesses, court, and jury, all potential exhibits have been pre-labeled and pre-numbered. Those numbers will be used for all purposes at trial, regardless of which party first offers the exhibit or the order in which the exhibits are offered.
- (2) The parties, having engaged in discovery, agree that no documents other than Exhibits 1-5 are relevant. This stipulation does not bar objections to Exhibits 1-5. This stipulation also does not address demonstrative aids that may be used during trial that may or may not be admitted into evidence.
- (3) All parties and witnesses are of at least of normal intelligence and none has or ever has had a mental condition that would impact a person's perception, memory, or ability to respond to questions on cross examination.
- (4) Charley Jackson was 14 years old at the time of the attack (DOB: 7/14/05).
- (5) Charley Jackson is the child of Barry Jackson.
- (6) All objections to Exhibit 4 are waived, and either party may enter Exhibit 4 into evidence at any point after opening statements.
- (7) The parties understand and agree that Exhibit 4 (the blueprint of the Roaring Tigers Show amphitheater) is not drawn to scale and are not prohibited from discussing the same while using Exhibit 4.
- (8) As of June 25, 2020, Belai had no medical, physical, mental, or emotional defects, unusual traits, or abnormalities other than what is expressly set forth in the affidavits and reports included in this record

- (9) As of the date of trial, Bobby Anderson (Bo Aquatic) is employed by Grande City Zoo.
- (10) For all purposes of this trial, Bo Aquatic is deemed to have been an employee of Grande City Zoo, at the time of the accident and currently, and all actions of Bo Aquatic at issue in this trial are imputed to Grande City Zoo as his employer, unless specifically otherwise herein.
- (11) All objections to Barry Jackson being the proper party to bring suit on behalf of Charley Jackson are waived.

# **LAW AND JURY CHARGES**

**CASE NO.: CR20-08-4893**

CHARLEY AND BARRY JACKSON

Plaintiff v.

GRANDE CITY ZOO

Defendant

Statutes and case law applicable to this case are binding only if they are from the jurisdiction of Bienvenue Parish or from the Bienvenue Parish Statutes. The only statutes, law and jury charges applicable to this case are set forth below.

Additionally, all trials are governed by the National High School Mock Trial Rules of Evidence, as well as Rules of Competition provided in the Handbook

---

## **STATUTORY LAW**

---

### **RRPS 2:2315 Liability for Acts Causing Damages**

Every act whatever of man that causes damage to another obliges him by whose fault it happened to repair it.

### **RRPS 2:2317 Acts of Others and of Things in Custody**

We are responsible, not only for the damage occasioned by our own act, but for that which is caused by the act(s) of persons for whom we are answerable, or of the things which we have in our custody.

### **RRPS 2:2500 Comparative Fault**

In any action for damages where a person suffers injury, death, or loss, the degree or percentage of fault of all persons causing or contributing to the injury, death, or loss shall be determined, regardless of whether the person is a party to the action or a nonparty. If a person suffers injury, death, or loss as the result partly of his own fault and/or negligence and partly as the result of the fault of another person or persons, the amount of damages recoverable shall be reduced in proportion to the degree of percentage of negligence attributable to the person suffering the injury, death, or loss.

---

## JURY CHARGES

---

### 1. **Burden of Proof**

The fact that a plaintiff claims to have been injured or has brought a lawsuit does not prove liability on the part of defendants or entitle plaintiff to recovery. The mere fact that an accident has occurred does not mean that defendants are presumed liable or negligent. The plaintiff in this action must prove each element of their case by a preponderance of the evidence. This means that the plaintiff must convince you that, when the evidence is taken as a whole, the facts sought to be proved are more probable than not. If the plaintiff fails to prove or establish any essential element of their case by a preponderance of the evidence, then you must find that they have failed to prove their case sufficiently to recover damages. The fact that a plaintiff has been injured or brought a lawsuit does not necessarily entitle plaintiff to recovery.

### 2. **Liability / Duty-Risk Analysis**

The standard of conduct required of persons in Louisiana in their relationships with one another is the basis for liability as set forth in **RRPS 2:2315** which provides, in pertinent part, that "[e]very act whatever of man that causes damage to another obliges him by whose fault it happened to repair it." a person is also responsible for the damages he occasions not merely by his act, but by his negligence, his imprudence, or his want of skill. To determine liability in negligence cases under **RRPS 2:2315**, our courts have adopted the following duty-risk analysis. To prove negligence, a plaintiff must prove five separate elements:

- (1) The defendant had a duty to conform his or her conduct to a specific standard of care (the duty element);
- (2) The defendant failed to conform his or her conduct to the appropriate standard (the breach of duty element);
- (3) The defendant's substandard conduct was a cause-in-fact of the plaintiff's injuries (the cause-in fact element);
- (4) The defendant's substandard conduct was a legal cause of the plaintiff's injuries (the scope of liability or scope of protection element); and
- (5) Actual damages (the damages element).

### 3. **Legal Duty**

A legal duty is the obligation to conform one's conduct to the standard of conduct of a reasonable person under like circumstances. Whether or not a legal duty is owed by one party to another depends on the facts and circumstances of the case and the relationship of the parties. To determine whether a defendant's conduct was below the standard applicable to his/her/its activities, you should consider the requirement that a defendant exercise that degree of care which we might reasonably expect from an ordinarily prudent person under the same or similar circumstances with similar skill or knowledge. This care will vary according to the circumstances. The standard is not that of an

extraordinarily cautious individual or the exceptionally skillful one, but that of a person of ordinary prudent person with similar skill or knowledge. The ordinarily prudent person will avoid creating an unreasonable risk of harm. In determining whether the defendant breached this standard, and created an unreasonable risk of harm, you may weigh the likelihood that someone might have been injured and the seriousness of that injury against the importance of society of what the defendant is doing and the advisability of the way in which he/she/it was doing it, under the circumstances. In summary, to find the defendant's conduct sub-standard, you must find that as an ordinarily prudent person under all the circumstances surrounding his/her/its conduct, the defendant should have reasonably foreseen that as a result of his/her/its conduct, some such injury as the plaintiff suffered would occur, and you must find also that he/she/it failed to exercise reasonable care to avoid the injury. You may find it helpful to phrase your inquiry this way: "how would an ordinarily prudent person have acted or what precautions would he/she/it have taken if faced with similar conditions or circumstances?"

#### **4. Scope of Duty**

Rules of conduct are designed to protect persons under certain circumstances against certain risks. Policy considerations determine the reach of the rule, and there must be an ease of association between the rule or conduct, the risk of an injury, and the loss complained of. In determining whether the interest of the party seeking recovery of damages is one falling within the protection of the rule of law whose violation gave rise to the damages, you should consider the particular case in terms of the moral, social, and economic values involved together with a view towards the ideal of justice.



# **PETITION FOR DAMAGES**

**CASE NO.: CR20-08-4893**

CHARLEY AND BARRY JACKSON

Plaintiff v.

GRANDE CITY ZOO

Defendant

---

## **JURISDICTION AND VENUE**

---

1. This court has subject matter jurisdiction, personal jurisdiction, and is a proper venue for this lawsuit.

---

## **THE PARTIES**

---

2. Plaintiff Charley Jackson is an individual residing in Grande City, Louisiana, and under the age of 18 on June 25, 2020.

3. This suit is being brought by Barry Jackson on behalf of their minor child, Charley Jackson, and Barry Jackson is the parent of Charley Jackson and proper party to bring suit on his behalf.

4. Defendant Grande City Zoo is a corporation chartered under the laws of Grande City, and Bo Aquatic is an employee of Grande City Zoo and was its employee on June 25, 2020.

---

## **FIRST CAUSE OF ACTION: NEGLIGENCE**

---

5. Plaintiff, Charley Jackson, attended the Tiger Show Exhibition at Grande City Zoo on June 25, 2020.

6. The Exhibition was overseen by Grande City Zoo and its employee, Bo Aquatic.

7. Defendant had a duty to Plaintiff to ensure that the selection of the Animal to appear on the Exhibition was reasonable.

8. Defendant had a duty to Plaintiff to take reasonable steps to ensure that the Animal was properly trained for its appearance on the Exhibition and would not pose a danger to Plaintiff.

9. Defendant breached that duty by failing to ensure that the selection of the Animal was reasonable and otherwise failing to take reasonable steps to ensure that the Animal would not pose a danger to Plaintiff.

10. On June 25, 2020, Defendant's employee Bo Aquatic brought the tiger to the Roaring Tiger Exhibition for its scheduled appearance at 2:00 p.m.

11. As part of the exhibition, the audience was allowed to come and pet the tiger.

12. At 2:44 p.m., the Defendant lost control of the tiger and it attacked the Plaintiff who was participating in the petting portion of the exhibition.

13. The Plaintiff, Charley Jackson, was mauled on the right side of their arm.

14. Due to the attack, the child's hand had to be amputated and Plaintiff accrued a large amount of medical debt.

15. As a direct and proximate result of the events, Plaintiff has suffered harm.

---

**PRAYER FOR RELIEF**

---

THEREFORE, Plaintiff demands judgment against Defendant and compensatory damages in an amount to be determined at trial, but not less than \$500,000.

Respectfully submitted,

*E. Doughty*

Jennings, Cummins, and Limbough  
Attorneys for Plaintiff

# ANSWER TO PETITION FOR DAMAGES

CASE NO.: CR20-08-4893

CHARLEY AND BARRY JACKSON

Plaintiff v.

GRANDE CITY ZOO

Defendant

---

## JURISDICTION AND VENUE

---

1. This court has subject matter jurisdiction, personal jurisdiction, and is a proper venue for this lawsuit.

a) Defendant's response: **admitted.**

---

## THE PARTIES

---

2. Plaintiff Charley Jackson is an individual residing in Grande City, Louisiana, and under the age of 18 on June 25, 2020.

a) Defendant's response: **admitted.**

3. This suit is being brought by Barry Jackson on behalf of his minor child, Charley Jackson, and Barry Jackson is the parent of Charley Jackson and proper party to bring suit on their behalf.

a) Defendant's response: **admitted.**

4. Defendant Grande City Zoo is a corporation chartered under the laws of Grande City, and Bo Aquatic is an employee of Grande City Zoo and was its employee on June 25, 2020.

a) Defendant's response: **admitted.**

---

## AS AND FOR AN ANSWER TO THE FIRST CAUSE OF ACTION

---

5. Plaintiff, Charley Jackson, attended the Tiger Show Exhibition at Grande City Zoo on June 25, 2020.

a) Defendant's response: **admitted.**

6. Exhibition was overseen by Grande City Zoo and its employee, Bo Aquatic.

a) Defendant's response: **admitted.**

7. Defendant had a duty to Plaintiff to ensure that the selection of the Animal to appear on the Exhibition was reasonable.

a) Defendant's response: **admitted.**

8. Defendant had a duty to Plaintiff to take reasonable steps to ensure that the Animal was properly trained for its appearance on the Exhibition and would not pose a danger to Plaintiff.

a) Defendant's response: **admitted.**

9. Defendant breached that duty by failing to ensure that the selection of the Animal was reasonable and otherwise failing to take reasonable steps to ensure that the Animal would not pose a danger to Plaintiff.

a) Defendant's response: **denied.**

10. On June 25, 2020, Defendant's employee Bo Aquatic brought the tiger to the Roaring Tiger Exhibition for its scheduled appearance at 2:00 p.m.

a) Defendant's response: **admitted.**

11. As part of the exhibition, the audience was allowed to come and pet the tiger.

a) Defendant's response: **admitted.**

12. At 2:44 p.m., the Defendant lost control of the tiger and it attacked the Plaintiff who was participating in the petting portion of the exhibition.

a) Defendant's response: **admitted.**

13. The Plaintiff, Charley Jackson, was mauled on the right side of their arm.

a) Defendant's response: **admitted.**

14. Due to the attack, the child's hand had to be amputated and Plaintiff accrued a large amount of medical debt.

a) Defendant's response: **denied.**

15. As a direct and proximate result of the events, Plaintiff has suffered harm.

a) Defendant's response: **denied.**

---

**PRAYER FOR RELIEF**

---

THEREFORE, Defendant demands that this answer be deemed good and sufficient, and after all legal delays and due proceedings had, that there by judgement herein in favor of Defendant dismissing Plaintiff's claims.

Respectfully submitted,

*C. Terry*

Green and Holbert LLC  
Attorneys for Defendant

# **PRETRIAL ORDERS**

CASE NO.: CR20-08-4893

CHARLEY AND BARRY JACKSON

Plaintiff v.

GRANDE CITY ZOO

Defendant

1. **Summary Judgment.** Plaintiff and Defendant both moved for summary judgment on the claim, respectively. Those motions are decided as follows. Based on their submissions, Plaintiff and Defendant have established that they both owed a duty to each other as a matter of law. Defendant owed a duty to Plaintiff to ensure that the selection of Belai the tiger to appear on the Roaring Tigers Exhibition was reasonable and to otherwise take reasonable steps to ensure that Belai would not pose a danger to Plaintiff's child. In addition, Plaintiff sufficiently established that they suffered harm—Plaintiff's child had their hand amputated and Plaintiff accrued copious amounts of medical debt—and that such harm was caused solely and exclusively from the animal attack that occurred on June 25, 2020. Therefore, those issues are no longer in dispute and will not be addressed at trial. However, the Court finds that there are genuine issues of material facts as to whether Plaintiff and Defendant breached their respective duties to each other and whether such breaches were the (direct and proximate) cause of the animal attack. Accordingly, the Plaintiff must prove at trial that the Defendant breached its duty of care and that such breaches were the (direct and proximate) cause of the animal attack.

2. **Bifurcation of trial.** In addition, the parties have jointly moved to bifurcate the trial into separate proceedings on liability and damages. That motion is GRANTED. In the first phase, the trial shall be limited to the issues set forth in section 1 above. If the Defendant is found to be negligent, the jury will hear evidence on the question of damages in a separate proceeding. Any evidence relating solely to damages shall be inadmissible at the liability stage. Either side may still introduce evidence involving the facts and circumstances of the relevant events as is necessary to establish liability.

3. **Vicarious Liability.** Plaintiff further moved to hold Defendant vicariously liable for the conduct of the following employee of Defendant: Bo Aquatic. That motion is GRANTED. At trial, all of the above-named individual's acts and omissions prior to, and including those on, June 25, 2020 shall be imputed to Defendant, and Defendant shall be vicariously liable for any of those acts or omissions. Moreover, any and all statements made by the above-named individual prior to, and including those on, June 25, 2020 shall be imputed to Defendant, and Defendant shall be deemed to have made those statements. Nothing in this order speaks to any act, omission, or statement made by the above-named individual after June 25, 2020. However, statements made by Aquatic in the course of Aquatic's

deposition shall be imputed to Defendant, and Defendant shall be deemed to have made those statements. As for all other acts, omissions, or statements made by the above-named individual after June 25, 2020, the trial court shall determine whether to impute them to Defendant.

## **Charley Jackson**

My name is Charley Jackson. I am currently 14 years old, and I live in Grande City, Louisiana. I am a freshman at Grande City Magnet High School, where I play soccer and tennis... or at least I used to before the attack. I had to get my right hand amputated after that tiger at the zoo went berserk and attacked me for no reason.

I went to the Grande City Zoo on June 25, 2020 for my friend, well not really my friend, but my teammate, Frances Goya's, birthday party. I did think it was pretty lame for a high school student to have their birthday at a zoo, but when I heard you could get up close and personal with a real tiger, I snagged one of his birthday cards and pretty much invited myself.

The party began at 12:00 p.m. on June 25, but I got dropped off around 1:30 p.m. I saw on the schedule inside the birthday card that the Roaring Tigers Exhibition where you could pet a live tiger was open between 2:00-2:30 p.m. I really didn't go for Goya, although I did sneak one of his cupcakes before the Exhibition started. When I got to the area of the zoo where they were allowing the attendees to approach and pet the tiger, the amphitheater I believe, a zookeeper was encouraging the kids in line to grab a piece of paper. They said they were guidelines for safety but not everyone seemed to be listening. I grabbed one, looked at it really quickly, and shoved it in my pocket. Also, speaking of that line... it was way too long when I showed up, so I decided to wiggle my way in front of Goya, who, despite being the birthday star, wasn't very close to the front of the line. It was hard to hear what the trainer and zookeepers were saying because the noise was so loud. People were shouting about how long the line was and how long it was taking, even though we were way past time anyways. On top of that, there was a group of college kids causing a fuss passing out candy and asking for money!

The Exhibition finally opened, and we got to meet Belai the tiger and her trainer Bo Aquatic. Bo was so weird and sounded like a country hick! But they definitely knew a lot about tigers. After seeing a



couple tricks, Bo invited some of the attendees up to pet the tiger. We had to wait in line again, so I just jumped in front of Goya like last time. Man, they are so slow on and off the field. But this time... I kind of wish that I wasn't so fast.

As I got closer to Belai, I saw she was wearing some harness thing around her body, but it looked pretty raggedy. I remember wondering why they wouldn't just buy her a new one if she was so special. Bo didn't look too put together, and they were hardly paying attention to the big cat as kids were coming forward. The line had gotten rowdy again because these wait times were so ridiculous! It got pretty loud, and it looked like Bo and the tiger were just as overwhelmed with the noise as I was.

Belai was bigger than I expected. In fact, I was really worried. I thought we would be petting a cub, like size of my cat named Ruski that I have at home, but her paws were as big, if not bigger, than my own hands. I didn't even notice until she stood on her back legs, and I thought that she might even make me look small. It was around 2:40 p.m. when I made it to the front of the line. What happened after that is a blur. All I know is that I was simply petting the tiger and then all of a sudden, I heard a deep growl and I felt my body get yanked forward. I woke up in the hospital with one less hand. I know that I am lucky to be alive, but my whole life has changed. I can't help but wonder why a business would let kids play with an animal who's capable of even more than what Belai did to me.

I agreed to complete this statement under oath.

*Charley Jackson*  
Charley Jackson

### **Benny Bourget**

My name is Benny Bourget, and I am from Beauparc, Louisiana. I moved to Grande City two years ago to study Civil Engineering at the University of Grande City. Within my first few weeks at the university, I had virtually no friends until... I joined Kappa Phi Phi, the best Greek organization on campus! We do all kinds of volunteer work and party from time to time if you know what I mean. I liked it so much that I have stayed on campus every summer instead of going home to head up KPP's outreach activities as Volunteer Chair. That's why I was at the Grande City Zoo on the day of that terrible accident.

On the morning of June 25th, I woke all of the KPP members up extra early to start our volunteer day at the zoo. I had the idea after hearing about that crazy Roaring Tigers Exhibition they do there because it always brings in so many people. So, I decided we were going to be passing out free candy bags to the zoo's visitors and ask for donations that we would split between the zoo and KPP. We got there around 11 a.m. and started to pass out candy bags. Things were pretty slow in the morning, but I knew we could get some more donations around the time that the Exhibition started.

Around 1:30 p.m., we saw a line start to form in front of the amphitheater where the show was scheduled to perform. We were so excited and got to work. We were passing out so many candy bags that we started to run out. There was some sort of birthday group of younger teenagers in line, and they were whooping and hollering for our goodie bags! Kids and candy, ya know? One of them even reached out and grabbed it from me. One of the other kids looked at him and said: "Charley, why do you always have to reach out and take things like that." The other kid responded: "Goya, how many times do I have to tell you... I do what I want." I didn't have time to finish hearing what they had to say because I had to

get more candy bags for the kids, and some zookeeper was screaming about no food in the amphitheater. I thought it was the perfect snack before the Exhibition but apparently not!

Around 1:45 p.m., I was walking alone behind the amphitheater when I heard a commotion. I looked that way and saw a medium-sized tiger in a cage while someone that looked like a trainer trying to coax it out. Suddenly, the tiger jumped out onto the trainer, and the trainer made a huge yelp. I was so scared and had no clue what to do. Then, I heard this deep, scary growl that you could only hear in the movies. I just stood there frozen, too frightened to move. Eventually, the tiger did jump down off the trainer, and he seemed to be okay. So, I just walked away. I felt like maybe I should have asked them if they were okay or tell someone, but I was so scared. I wish that I would have now...

I arrived back at the zoo around 3:00 p.m. because I had to drive all the way back to the KPP house to get more candy. As I walked up to the front, I noticed something was up. There were ambulances and police everywhere. I asked a police officer what happened, and they told me there had been an attack during the Roaring Tigers Exhibition. Then, I saw that kid who snatched the candy out of my hand being rolled out of the front entrance. Somebody that looked like maybe their parent was asking them: "Charley, are you okay? Can you hear me?" The kid answered, "I never should have done it. I'm going to die!" I had to look away. Knowing what I know now, maybe I should have said something to someone.

I agreed to make this statement under oath.

*Benny Bourget*  
Benny Bourget

## **Case Report of Dr. Evanca Edwards**

I am Dr. Evanca Edwards, and I am from Bastrop, Louisiana. I am a lover of animals, especially big cats, which led me to my current career. When I was little, I signed up for an animal feeding program at the Bayou Zoo outside of New Orleans where I got to feed tigers. I think my fascination with tigers began then. I went to the University of Arkansas in 1996 where I majored in biology. In 2004, I had the wonderful opportunity to complete my doctorate in Animal Science with a concentration in big cats at the University of Texas at Austin. After completing my degree there, I moved back to my home state where I work as an animal expert. I am also a part-time professor at LSU where I teach, do research on tigers, and help take care of Mike!

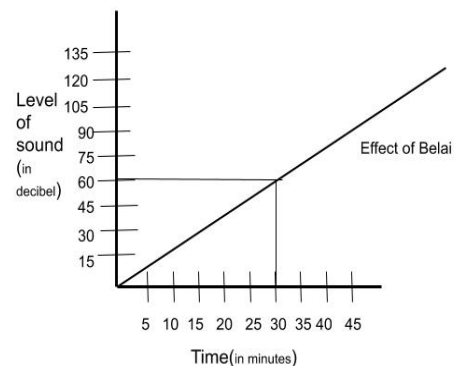
I am involved in today's case as an expert on tigers. To prepare my report, I received the affidavits of Benny Borquet, Charly Jackson, Bo Aquatic, and Frances Goya. In addition to these affidavits, I also received the training history of Belai, the guidelines for the Roaring Tigers Exhibition, the schedule of the birthday party, and the seating chart for the show. I believe all these materials were sufficient and helped me draw conclusions for today's case.

Tigers are fascinating animals. Most people think that tigers belong in the wild, but with proper training, tigers can adapt to social settings. However, training does not eliminate the fact that tigers are wild animals by nature, and nature can rule over nurture. I have studied a lot of tigers that have been trained to adapt to social settings and used in show business. The age and gender of the tiger, nature of the training, time of the show, and other external factors play a huge role in determining how a tiger behaves in a social environment.

Usually, a tiger used in show business, whether it is a circus or an animal show, is a female cub. Animal trainers prefer cubs because they are much less likely to display violent behavior than a fully grown or an adolescent tiger. Cubs don't have fully grown canines or sharp nails. Most importantly, they

are small and don't have much strength. If a cub starts to exhibit violent tendencies, it is easy for a trainer to control them. Belai was not a cub. She was almost three years old which classifies her as an adolescent tiger. She is not yet fully grown; however, she may not be the best choice for the Exhibition.

Training determines the nurture of animals. Wild animals performing in shows require meticulous training. Animal trainers are recommended to begin the training a few months after birth and get familiar with the animal so that they can gain trust and confidence in the animal. There are various steps involved in training the animal. The best way to train an animal is by using the technique of positive reinforcement. In this technique, an animal is provided with treats when they do what the trainer asks of them. After they learn the trick, the treats are given every so often. Belai was trained for tricks for almost three years, and the trainer used positive reinforcement. However, Belai's training might not have been sufficient. The most important part of training an animal for show business is to teach the animal to avoid any external environment which could be but is not limited to noise, movement, smell etc. Studies have shown that sudden movements and sounds can be the most disturbing of all external factors. Tigers have sensitive eardrums, so the more they are exposed to loud noises, the more they become aggressive. Here is a chart that shows the correlation between the level of sound and the amount of a time a tiger is exposed to said sound.



To gauge how loud different types of sound are, normal conversation is about 60 decibels (dB), a lawn mower 90 dB, and a rock concert 120 dB. Since it was an animal show with an audience and microphones, the sound level must have been between 75 to 120 decibels, which is the higher range. The Roaring Tigers Exhibition was supposed to

be 30 minutes long. If there was a normal level of sound i.e. 60 dB and 30 minutes of show time, then there would be a minimal effect of sound on Belai, but that was not the case of the day. The sound was above the normal level, and the show ran longer than 30 minutes, which could have made Belai more sensitive and aggressive to sound.

Usually, crowds cannot be controlled, so animal trainers are advised to make guidelines for the shows and make sure that the audience follows them. If there are ever any violations of the guidelines, the show must be cancelled, and the trainer should take control of the animal by removing them from the crowd to avoid any accidents. Unfortunately, the guidelines used that day were general to all animal shows in zoos and nothing specific to the Roaring Tigers Exhibition with Belai. The guidelines are standard for a regular show, but tigers are different from most other animals, which was not considered. However, I do think that these guidelines were sufficient in this case, even though this was not considered.

In addition to the guidelines, the trainers are also recommended to have the animal in a harness at all times, so that they can be controlled easily. The harness should be approved by the Board of Safety of Animals and Audience and should be replaced when it gets old. The lifetime of a harness is usually a year; however, the usage of the harness might affect its durability.

From the various affidavits and exhibits I have received, I have found mention of loud noise, movements of people, and especially the show running over the planned time. All these factors could have played a role in aggravating Belai to display violent behavior. Like I said earlier, tigers are wild animals and trained tigers can be dangerous as well. Choosing the right tiger and giving them proper training can help to avoid most of the dangerous aspects of using wild animals for show business; however, we can never completely rule out all risks associated with it. *Dr. Evanka Edwards*

I agreed to complete this report under oath.

Dr. Evanka Edwards

## **Bo Aquatic**

My name is Bobby Anderson, but everyone knows me by the name of Bo Aquatic. I am 45 years old, and I live in Grande City, Louisiana, where I work as an animal trainer and zookeeper at my favorite place on earth: The Grande City Zoo. I got the job after completing my bachelor's in animal science at the University of Oklahoma in 1996 and moved to Louisiana to escape my crazy family! I had always wanted to work with big cats after visiting this huge farm in Oklahoma full of exotic creatures with my mom and pop when I was a child. Luckily, the Grande City Zoo had an opening in the department, and I took it!

I have been working with big cats for over 20 years now, and I have loved every second of it. My favorite big cat to train is the tiger because of their strength, power, and beauty. Plus, they are a huge crowd pleaser! That's why the zoo's administration approached me about doing a show a couple of years ago. I decided to name the show the Roaring Tigers Exhibition, and I host it every Tuesday and Thursday of the week during the summer. I keep two tigers trained to do the show at all times, so they do not get too tired. The two most recent tigers in my rotation were Belai and Sarai. I trained both of them myself, but Belai and I... we have... I mean... had a special bond. What happened on June 25, 2020 changed everything.

That Thursday started like any other day. I went to see Belai and Sarai around 10:00 a.m. They were both waiting for me at the gate. I made sure that they were fed, and Belai was ready for her show of the week. I went on to feed the other big cats and came back around 1 p.m. to get Belai. I walked in, and she immediately put her head in the harness. I had just gotten a new harness a couple months ago and had it certified by the board. Belai thought it was super comfy! Belai was also the older cat, almost three at the time, so she had been doing this for a long time. In fact, Sarai is only 8 months old. Belai

was always... so good at showing her the ropes.... Anyways, I got Belai into her rolling cage, and we started on our way to the amphitheater where I host the Roaring Tigers Exhibition.

As we were walking behind the stage, I saw one of my fellow zookeepers handing out the safety guidelines that the zoo and I came up with to ensure everyone was safe. The zookeeper was also lecturing the group of people before they walked in. I asked them if they gave out the guidelines, and they said that they were in the process of it. That made me happy because we believe in safety first at The Grande City Zoo. Later, as I was getting Belai out of her cage behind the amphitheater, she did one of her little playful growls and jumped at me. I laughed because she was playing just like she did when she was a cub. However, I did not notice she had put on a lot more weight, so the jump did give me a fright for just a quick second. This wasn't out of the ordinary, so we shrugged it off.

The Roaring Tigers Exhibition started right on time at 2:00 p.m., and the crowd was super interactive that day. I was able to teach the audience so much about tigers, and Belai was doing perfect. She even sat up on her hind legs to wave at everyone just like I asked. Younger tigers are so great with an audience. The Exhibition went a little over time by about 5 minutes or so which put us at around 2:35 p.m. However, Belai was being so good, and the audience was so interactive. I decided to do our petting session even though the lemur show was coming up next. They could wait.

I invited some of the older kids in the crowd like I always do to get a little closer to Belai. Everything was going fine, and Belai was doing perfect as the kids stroked just the small part of her back where I told them too. Everything changed around 2:40 p.m., when people in line started to scream in the line to hurry it up. I looked up to tell them to stay quiet like the guidelines said, but it was too late. I saw something that looked like maybe a hand or maybe even a piece of candy rush across my vision, and I felt Belai jump towards the first kid in line. I quickly got Belai off the kid who looked to be maybe 14 or so, but I saw that the damage had already been done. I quickly got Belai back in her cage, and the



rest is almost like a blur. I think I remember telling people to calm down and follow the guidelines, but that was it.

Later that day, Animal Control came and put down Belai, my best tiger... my best friend. There's no way she could have done this unprovoked. She has never had an incident before, and I know I definitely saw something flash by my face that day. This is why guidelines and safety precautions have to be followed. I am devastated, and I don't know if I can go back to work without Belai.

I agreed to complete this statement under oath.

*Bobby Anderson*  
Bobby Anderson

## **Frances Goya**

My name is Frances Goya, but my teammates and friends just call me Goya. I attend Grande City Magnet High in Grande City, Louisiana, where I am a freshman. I am a part of the GCMHS 4-H Club, and I am also the goalie for the Junior Varsity Soccer Team. I recently turned 15 years old, in fact I had my birthday celebration at the Grande City Zoo.

Ever since I was young, I had a growing fascination for all things nature – animals, plants, clouds, you name it. That's why, when my mom suggested to me in early June to have my birthday party somewhere that I can be surrounded by nature, naturally, I agreed. Also, my grandpa was flying in, so I wanted to celebrate somewhere exciting. It only confirmed things when my mom mentioned that she could schedule a real live tiger show/petting during my party at the Grande City Zoo, too! She made the schedule, and I stapled them into my birthday cards to pass out to my friends at school as soon as possible.

I got to the zoo early that day, around 11:00 a.m., to start setting up the picnic tables they allotted us to celebrate. Since I couldn't put the snacks and cupcakes out until after the tiger petting because the safety guidelines the zoo provided us with said that we could not be around food before meeting Ms. Belai the Tiger, I tied balloons and other decorations to the tables. Since I spend a lot of my free time researching various animals and their habits, I had a feeling that we would need to schedule the food after meeting Belai because the smell could potentially cause her to behave differently than normal, but then again, I am no tiger expert.

Around noon that day, I opened a few of my gifts and cards from family. I noticed the zoo was getting busy, and they were open for normal hours, too, so it was a few more people than I anticipated. Around 1:45 p.m. I noticed the animal trainer, Bo Aquatic, and other zookeepers begin setting up the stage of the amphitheater for Belai the Tiger's appearance. Many people were passing around the same

guidelines that Grande City Zoo provided my mother with when we scheduled the tiger showing. There were also some people there passing out candy! That was definitely against the guidelines, so I told the zookeepers. They responded quickly and took up everyone's candy. Although I did notice that kid Charley Jackson from my soccer team snatch some and put them in his pocket. I was annoyed with Charley already because I specifically didn't invite them when I was at school, but I guess they caught wind of my party and decided to show up anyways. I don't dislike Charley, but they're a little too rambunctious for my liking. However, I did not say anything because it was already getting pretty loud in the amphitheater, and I did not want to add to the chaos as we were walking in.

When the show started, we met both Belai and her trainer, Bo Aquatic. Bo just talked to us about the power and strength of tigers and introduced us to Belai. She was a bit bigger than I remember seeing on the pamphlet, so much so that she made her harness look small and old, but I didn't mind. I was in complete awe. Bo got Belai to do some tricks for us, and finally, around 2:35 p.m., said the kids could get in a line and come up front to gently pet her on the back. As much as I wanted to run to the front to be first in line, since it was my birthday and all, I knew better than to make any fast, sudden movements because of the guidelines.

I patiently stood in line for roughly 3-5 minutes or so, and as I neared the front, I noticed Charley behind me. Then, he suddenly jumped in front of me. I was pretty mad and so was the rest of line. Lots of kids started to make a ruckus, but Charley would not go to the back of the line. Thankfully, the noise was not as chaotic as the beginning of the show.

Around 2:42 p.m., it was Charley's turn to pet Belai the Tiger, but instead of approaching gently, they rushed forward and reached out towards Belai. I was already worried Charley would not act according to the guidelines because they don't ever take commands and direction on the soccer field, and I saw them put that candy in their pocket. However, Charley did not deserve what happened to

them. After they reached out, Belai lunged. I turned my head, but everyone including myself knows that Charley lost a ton of blood, and even their hand that day. Despite Charley's mistakes during the tiger petting, I would have expected the trainer to be able to handle their own tiger that they had supposedly raised since birth.

I agreed to complete this statement under oath.

*Frances Goya*  
Frances Goya

### **Case Report of Dr. Gayle Nowell**

I am Dr. Gayle Nowell from Alexandria, Louisiana. I am a scientist in the field of animal behavior. I have been doing this as a professional for the past fifteen years, but if you really ask me, my study of animal behavior started when I was four when I got my pet cat Lila. Watching Lila grow was the best part of my childhood, and I knew I wanted to study relationships between humans and animals like the one me and Lila. I went to the University of New Orleans to get my bachelor's in animal psychology. I did internships in the zoo every summer of my undergrad which helped me get into my doctoral program at the University of Phoenix in 2003 where I specialized in animal behavior. I have done numerous research and published several peer-reviewed articles in the field. I am also an advocate of animal rights and the chairperson of the Association of Animals in Show Business.

I was contacted by the defense in today's case to review the findings of Dr. Edward's report and see if everything was done to a degree of scientific certainty. I have received the affidavits of all witnesses, the report of Dr. Edwards, the guidelines, the seating chart, the schedule for the show. My report is based on the findings and criticism of Dr. Edwards report.

Dr. Edwards had three main concerns about Belai and the Roaring Tigers Exhibition. The first was Belai's age, second was the level of sound and the duration of the show, and lastly the guidelines. I am going to address all those concerns and add some things which Dr. Edwards might have missed while writing their report.

I don't deny the fact that female cubs are generally preferred by animal trainers for a show; however, we cannot deny the fact that Belai was a trained tiger. Belai was an early adolescent tiger on the day of the performance, and she had been trained to do shows. She has been in show business for about two and a half years. It would not be accurate to say that Belai's age made her unfit for the show. If anything, her age made her more experienced, hence better performance.

Belai has been able to avoid the external environment successfully in almost every act. I agree with Dr. Edwards about using positive reinforcement while training, although I don't agree with them when they said that Belai was not trained enough. I do agree that tigers have sensitive eardrums, and they may act violently when there is sudden movement, loud noise, or smell. But we need to understand that correlation does not always mean that there is causation. This simply means that the external environment can have a role in making a tiger more violent, but to say that it is what made Belai attack Charly would be scientifically inappropriate. This is the first and the only incident of Belai's aggression during a show in her performance career that she has had for more than two years. The show ran a bit longer than planned for, but that is very normal to almost every animal show. There is a time for animal performance as well as audience engagement, and if guidelines are followed, show time does not generally affect the animal's behavior within reasonable limits.

Guidelines used in every animal show are pretty much the same and it does not depend on the animal. I know that from my experience while interning at zoos. There is a level of safety which all animal shows require, and they are standard for all shows. While I cannot disagree that tigers are wild animals and often aggressive, the safety measures like using a harness and controlling the external environment can help control the aggressiveness. Oftentimes with tigers, a roar can be considered an aggression in layman's knowledge, but it could also be an appreciation or expression of happiness in reality. The trainers are usually who best know the animals and they are more comfortable and playful with them. Deferring to the trainer and guidelines should always be first priority, and it clear that the audience did not do this.

In opposition to the belief that nature rules over nurture, I believe Belai's training and her history of performance showed that she was fit for the show. Belai's nurture took over her nature of aggressiveness, and it was not until the sudden reach by an audience member or the possibility of candy

in the near vicinity that Belai acted differently. If the guidelines were followed, there wouldn't have been a problem with the show, and Belai would be alive.

I agreed to complete this report under oath.

*Dr. Gayle Nowell*

Dr. Gayle Nowell

# Exhibit 1

## THE ROARING TIGERS EXHIBITION

Welcome to Grande City Zoo! We are so glad that you decided to join us for the most popular animal show in Louisiana. During Roaring Tigers, you, as an audience member, will get first-hand experience with a real live tiger. Up close and personal! Before attending our show, make sure to follow these guidelines to ensure your safety and those around you. We hope you have a great time!



**#1: Avoid eye contact and do not make faces**

**#2: No running or yelling around the tiger**

**#3: Do not touch the trainer, Bo Aquatic**

**#4: Do not touch the tiger's harness**

**#5: No food or drink inside the amphitheater**

**#6: No sudden movements**

**#7: Do not provoke the tiger**

Guling# |#Er#Dtxdw#  
Odwxsgdw#B<25524 ;#



## Exhibit 2

#  
#  
#  
#



#  
#

#

# Exhibit 3

#  
#  
#  
#  
#  
#

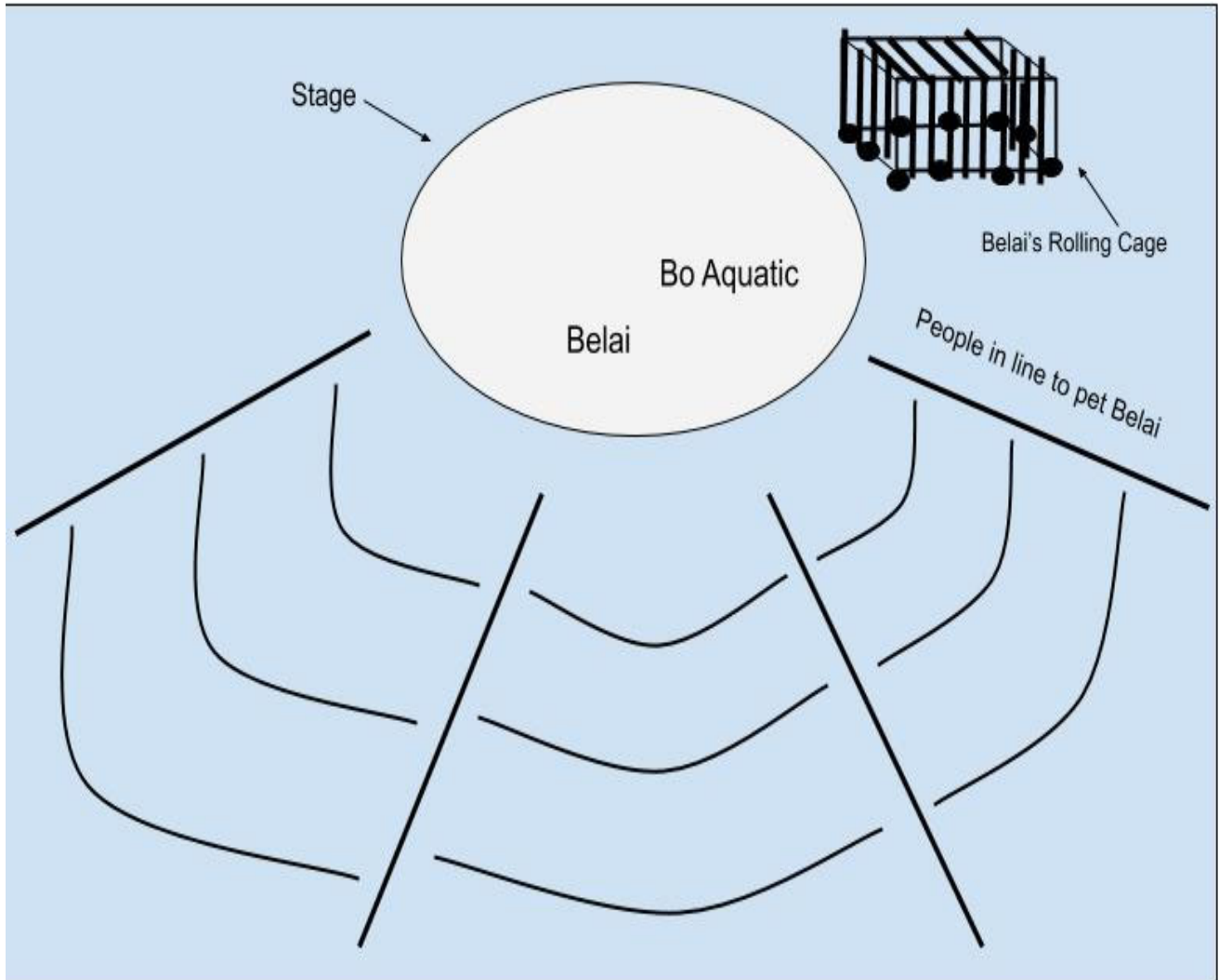


#

#  
#  
#  
#  
#  
#

## Exhibit 4

#  
#  
#  
#



\* The theater can hold upto 150 audience. Audience must be seated at all times unless specified by the trainer. Please read the guidelines before entering the theater and follow them.

#  
#  
#

#

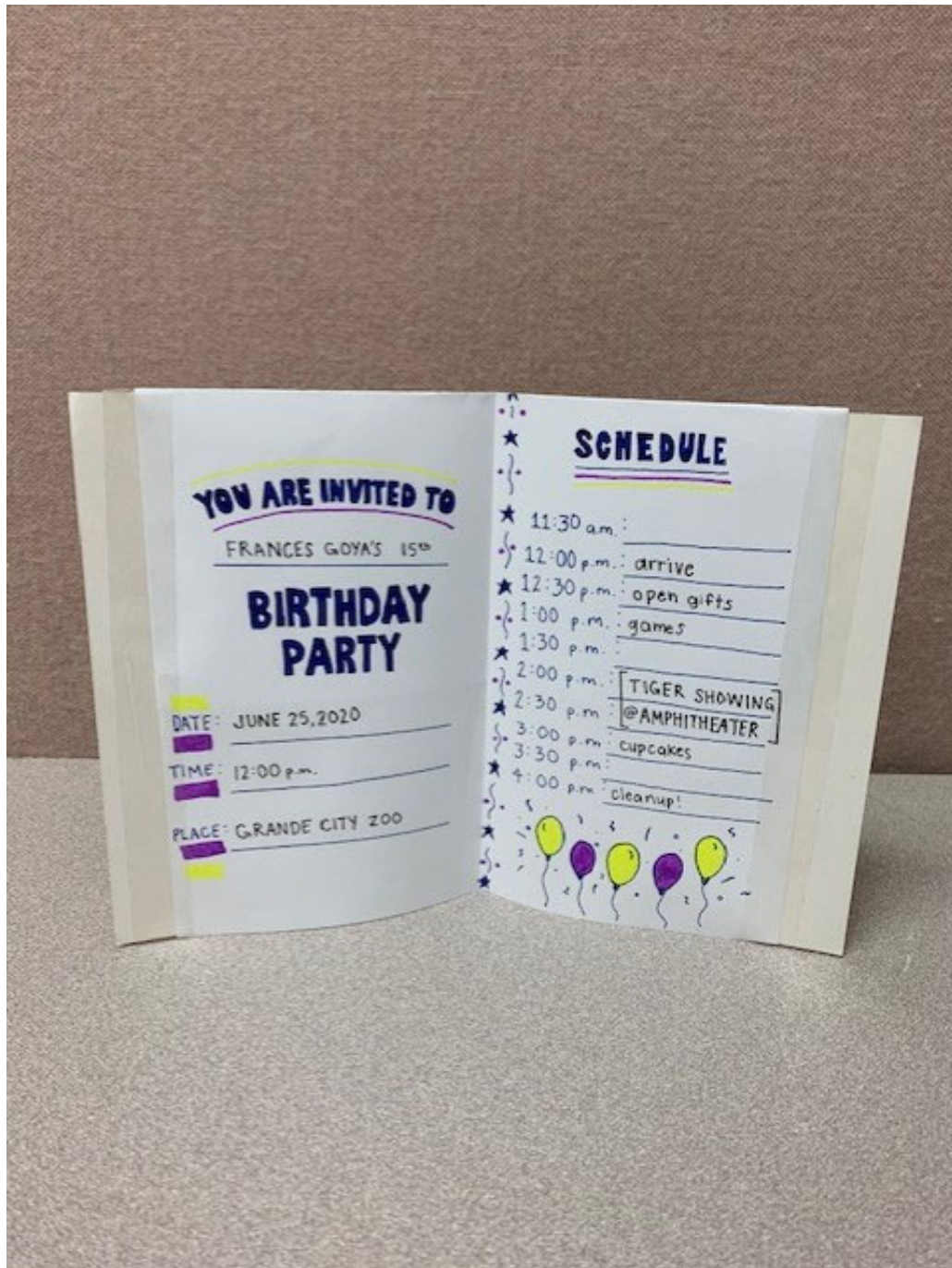


# Exhibit 5

#

#

#



#

#

#