

RARE SPECIES FUND POTENTIAL ISSUES

Below is a summary of available financial records of RSF. Per an inquiry to the IRS, 990-EZ reports prior to 2011 and the report for 2012 are not available. The most recent three years (2017-9) are available on Guidestar.

RARE SPECIES FUNDS REVENUE VS GRANTS AND ANIMAL CARE EXPENSE						
Year	Contributions to Rare Species Fund from PART II FIVE YEAR HISTORY in 2011 and 2013 990-EZ					
2007	48,814					
2008	42,150					
2009	86,344					
2010	20,662					
2011	0					
2012	3,000					
				ANIMAL CARE IN OTHER XP		
Year	REVENUE	Grants sent to Conservation Entities	PCT of Revenue	Animal Food & Care	Habitat Repair & Construction	TOTAL ANIMAL CARE
2013	87,599	28,500		not broker out, only have total other		50,946
2014	375,698	84,200		102,937	72,555	175,492
2015	509,084	131,606		181,968	171,479	353,447
2016	288,575	118,954		165,773	145,715	311,488
2017	216,109	50,926		59,260	81,048	140,308
2018	177,877	112,448		42,988	26,823	69,811
2019	801,725	51,064		50,999	332,623	383,622
TOTAL	2,456,667	577,698	24%		60%	1,485,114
AVG	350,952	82,528				
Mission (from Guidestar)						
The goal of the Rare Species Fund is to enhance wild species populations through the support of grassroots wildlife conservation projects, the maintenance of genetically representative viable populations of captive wildlife and the education of the public about conservation issues through the use of animal ambassadors.						

Antle operates a 501c3 nonprofit named Preservation Station Inc. d/b/a Rare Species Fund (FSA) per their IRS 990-EZ filings. He also operates one or more for profit operations. According to reports there are entities registered as T.I.G.E.R.S. LLC and South Carolina Conservation Farm LLC formed by the same CPA who is listed as filing the 990 forms. In his marketing Antle uses the name or term T.I.G.E.R.S., an acronym for The Institute of Greatly Endangered and Rare Species, and the name or term Myrtle Beach Safari to refer to the zoo operation.

In addition to the zoo location Antle has a storefront location in the town of Myrtle Beach. The sign for the storefront location reads "T.I.G.E.R.S. sponsored by Preservation Station," the name of the nonprofit. So, the name of the nonprofit Preservation Station and its dba Rare Species Fund are frequently intermingled with the terms that appear to be associated with the presumably much larger for-profit operation. The Facebook page reads "Facebook.com/Tigerspreservationstation" and uses the T.I.G.E.R.S. acronym, then the full name, and refers to T.I.G.E.R.S. "providing much needed



funds,” then references the RSA website in a way that seems to blend the for-profit and nonprofit operations.

Bottom line, it is unclear what operations fall under the nonprofit and what other actual corporate entities contain what portion of the for-profit operations.

The revenue for RSA averaged \$300k per year over the 2013-8 period then jumped to \$800k in 2019. Based on the number of animals reported and the significant visitor fees that Antle brags about in Tiger King, we would expect that the for-profit operation has revenue and expenses far in excess of this, likely at least in the low millions. Therefore, we would guess that the nonprofit is a relatively small part of the overall operation and revenue.



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T.I.G.E.R.S. Preservation Station

Price Range · \$\$\$

Environmental Conservation Organization · Wildlife Sanctuary

T.I.G.E.R.S. - The Institute of Greatly Endangered and Rare Species is a wildlife education organization, dedicated to promoting global conservation with informative, educational and entertaining interactive programs. Our animal ambassadors are important living examples of current worldwide environmental issues, helping us teach people about the importance of conservation and global biodiversity. T.I.G.E.R.S. also works closely with international wildlife conservation projects in Africa and Thailand. In addition to providing much needed funds for these programs, our personnel have been involved in field research as well. www.RareSpeciesFund.org

@myrtlebeachsafari

@tigerkingdom

FINANCIAL COMMENTS

USE OF FUNDS

Antle does a very good marketing job of presenting himself as a “conservationist” and emphasizing the nonprofit’s donations to conservation organizations who work in the wild. The biggest question in our view that arises from a look at the nonprofit 990-EZ reports is how the revenue is spent. The “mission” as stated on Guidestar does include a reference to maintaining animals and using “ambassadors.”

Mission (from Guidestar)

The goal of the Rare Species Fund is to enhance wild species populations through the support of grassroots wildlife conservation projects, the maintenance of genetically representative viable populations of captive wildlife and the education of the public about conservation issues through the use of animal ambassadors.

However, the marketing of RSA tends to focus on donations to in situ conservation projects in the wild.

Over the 2013-9 period the amount spent on animal care was 2.5x the amount claimed as grants to conservation.

The question this raises is does the nonprofit have separate animals that it is supporting versus those used by the for-profit operation? This seems highly unlikely. If not, then we have the vast majority of the funds that are marketed primarily as supporting in situ conservation work being used to feed and house animals that are also used in the for-profit operation.

The marketing and the animal care expenditures raise several potential legal questions.

- 1) If the animals supported by the nonprofit are used by the for-profit operation, does such a use of funds comply with IRS nonprofit rules?
- 2) Does the apparent blending of the nonprofit and for-profit names and particularly the emphasis on the nonprofit as a vehicle for donating to in situ projects mislead the public into thinking that more of their donations go to conservation projects than the roughly one quarter of each donation dollar that is being donated to those projects?

REVENUE RECOGNITION

All of the revenue for RSA is listed on Line 8 as Contributions & Grants. What is unclear is whether some, or even a majority, of this revenue is from fees paid to hold, pet, and/or have a photo taken with the baby tigers or other fees. If so, we believe that revenue should appear separated on line 9 as “Program service revenue.”

Part I Summary			
Activities & Governance	1	Briefly describe the organization's mission or most significant activities WILDLIFE CONSERVATION/EDUCATION	
	2	Check this box <input type="checkbox"/> if the organization discontinued its operations or disposed of more than 25% of its net assets	
	3	Number of voting members of the governing body (Part VI, line 1a)	5
	4	Number of independent voting members of the governing body (Part VI, line 1b)	5
	5	Total number of individuals employed in calendar year 2018 (Part V, line 2a)	0
	6	Total number of volunteers (estimate if necessary)	0
	7a	Total unrelated business revenue from Part VIII, column (C), line 12	0
	7b	Net unrelated business taxable income from Form 990-T, line 34	0
Revenue	8	Contributions and grants (Part VIII, line 1h)	177,877
	9	Program service revenue (Part VIII, line 2g)	0
	10	Investment income (Part VIII, column (A), lines 3, 4, and 7d)	0
	11	Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)	0
	12	Total revenue—add lines 8 through 11 (must equal Part VIII, column (A), line 12)	177,877

PURPOSE OF IN SITU DONATIONS

The other question is the extent to which these in situ donations may be, in effect, payment for importing animals to use at the zoo. In layman's terms, under the Endangered Species Act (ESA) it is illegal to import an endangered species without a permit from the US Fish & Wildlife Service. An exception is made, and a permit to import can be issued by USFWS, if the import would "enhance the propagation or survival of the affected species" in the wild.

USFWS has taken the position that if the importing entity makes a donation to an organization that is doing work to preserve that species in the wild, the donation satisfies the requirement even though it may have no relationship to the specific animal being imported. Animal welfare organizations oppose this interpretation of the ESA, referring to it as "pay to play."

Applications to import are posted for comment in the Federal Register. The only way we know of to determine if some of the donations made by RSF were actually related to importing of animals would be to compare those postings in the Federal Register to the entities and timing of RSF donations if the latter were available.

To the extent donations were made for the purpose of importing animals that might be used to generate profits for his for-profit operation it casts some doubt on his motivation, but it does not necessarily mean the funds did not go to legitimate conservation organizations. To determine that one would have to examine the recipient organizations. Are they organizations that are truly accomplishing something for conservation? Or are they organizations, for instance, who breed animals to sell to zoos like Antle's or otherwise breed them for life in a cage, rather than organizations that are actually working to preserve the animals in the wild? Others have examined some of these in detail and raised serious questions about their legitimacy as conservation organizations.