UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

AMERICAN SOCIETY FOR THE PREVENTION OF CRUELTY TO ANIMALS, et al.,	
Plaintiffs,)	
v.)	Case No. 1:03-cv-02006 (EGS/JMF)
RINGLING BROS. AND BARNUM &) BAILEY CIRCUS, et al.,	
Defendants.)	

DX 27

EXHIBIT 27 TO REPLY IN SUPPORT OF DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

AMERICAN SOCIETY FOR THE PREVENTION OF CRUELTY TO ANIMALS, et al.,

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Plaintiffs,

v.

Case No. 1:03-CV-02006 (EGS/JMF)

RINGLING BROS. AND BARNUM & BAILEY CIRCUS, et al.,

:

Defendants.

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DECLARATION

- I. Deborah Olson, declare under oath as follows:
- 1. I am the Executive Director of the International Elephant Foundation. In that capacity I served as the editor of the *Elephant Husbandry Resource Guide (EHRG)*.
- 2. I am also a member of the Steering Committee of the Association of Zoos and Aquarium's (AZA) Elephant Taxon Advisory Group/Species Survival Plan (TAG/SSP). I also serve the Elephant TAG/SSP as the studbook keeper of the North American Region Studbook for the African Elephant.
- 3 I previously spent twenty (20) years as an elephant handler/keeper/manager at the Indianapolis Zoo.
- 4. There are currently eighty-one (81) AZA-accredited institutions in the United States that care for a total of approximately 285 elephants of both species (African and Asian).
- 5. Based on information available to me and my own personal knowledge, there are approximately one hundred and twenty-eight (128) elephants in forty (40) AZA-accredited

institutions that are being managed totally or primarily in some version of a "free contact" management system. The remainder utilize a "protected contact" management system.

6. A free contact management system is any one in which the handler or keeper is generally right next to, and in immediate contact with, the elephant with no physical barrier between them. Free contact management is a commonly practiced and generally accepted approach to management of elephants in captivity.

7. It is my experience that free contact management of elephants nearly always incorporates regular use of what the EHRG refers to as a "guide" and is sometimes inaccurately by this standard called an "ankus" or "bullhook."

8. A protected contact management system is any one in which elephants are handled through or from behind a barrier with direct physical contact between elephant and handler restricted to specific and limited locations.

9. In my experience, many of those facilities that use a protected contact management system also utilize a guide to some extent.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 26th day of October . 2006.

Deborah Olson