

Plaintiffs' Exhibit 10
Motion To Compel Inspections
(Civ. No. 03-2006 (EGS/JMF))

AFFIDAVIT

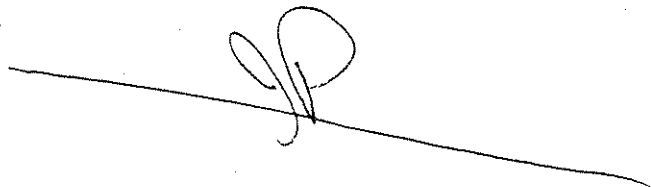
I, Joel J. Parrott, D.V.M., being duly sworn on oath make the following statement:

I, Joel J. Parrott, make the following statement to James Schwartz, who has identified himself as an Investigator employed by the United States Department of Agriculture. I swear, under oath, that the following statement is true and correct, and is provided under my own free will.

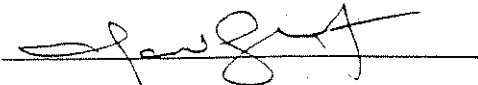
I am the Executive Director and a staff veterinarian of The Oakland Zoo, 9777 Golf Links Road, Oakland, CA 94605. My telephone number is (510) 632-9525. I have worked for The Oakland Zoo for [] I have [] of experience working with elephants, and have been involved in their training, veterinary care, handling, design of facilities, treatment, etc..

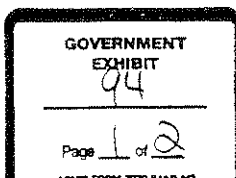
On or about August 24, 1999, Christine Franco, Humane Investigator, Santa Clara County Humane Association, and Sergeant Williams, San Jose Police Department, met with Colleen Kinzley, General Curator, and me at the Oakland Zoo. We were shown several photographs which were apparently taken of Asian elephants at Ringling Brothers' Barnum and Bailey Circus at their show in San Jose, CA. In carefully examining these photographs, Colleen and I determined through our expertise, that the wounds documented on these elephants were consistent with control wounds caused by an ankus. The wounds were not consistent with incidental abrasions or other control procedures. I do not recall whether Ms. Franco or Officer Williams requested that Colleen and I travel out to the San Jose Arena to examine the elephants wounds. Neither Colleen nor I visited Ringling Brothers or witnessed the elephants' wounds in person. My impression of the wounds are based on my interpretation of the photographs, and not an actual site visit to examine the Ringling Bros. elephants.


SIGNATURE OF AFFILANT



Subscribed and sworn to before me at The Oakland Zoo, 9777 Golf Links Road, Oakland, CA on this 25th day of July, 2000.





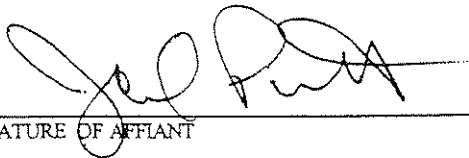
AFFIDAVIT

I, Joel J. Parrott, D.V.M., being duly sworn on oath make the following statement:

It is apparent in reviewing these 62 photographs again today, July 25, 2000, that the wounds documented are in locations on the elephants which are consistent with locations used to control the animals, and are in common places caused by ankuses or hooks. These locations include - behind the ears, on the left rear flank, on the top right side of the head, and on the left foreleg. In reviewing the photographs I have determined that it is almost impossible for anything else to have caused the lesions behind the ears. The drawing of blood would not have caused the wounds behind the elephants' ears, for they are in places where blood is not drawn from an elephant. The wounds are also not consistent with other conditions, such as ingrown hairs.

The majority of the wounds documented in these photographs are fresh, actively draining puncture wounds caused by an ankus or hook. Some are oozing punctures. In my professional opinion, along with that of Colleen Kinzley, there are far too many fresh wounds on these elephants. Although most of the wounds documented in these photographs appear to be superficial, it is unusual to have that many fresh wounds on elephants. Also documented in these photographs are what appear to be drag wounds, caused by an ankus that did not catch in the elephant's skin. Some are fresh and some are scars.

It is apparent that Ringling Brothers' is actively using an ankus which may be too sharp for the amount of force which is put behind it. It is apparent that the trainers and handlers may be using excessive force and poor techniques, with controlling devices, to control and train their elephants.


SIGNATURE OF AFFLIANT



Subscribed and sworn to before me at The Oakland Zoo, 9777 Golf Links Road, Oakland, CA on this 25th day of July, 2000.



APHIS FORM 7162 Replaces VF Form 3-59G which is obsolete (NOV 92)

DESIGNATED PURSUANT TO 7 U.S.C. 22.7 TO ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS. AUTHORITY NO. 3014

