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.

EXHIBIT I

TO

FELD ENTERTAINMENT, INC.'S REPLY IN SUPPORT OF DEFENDANT'S CROSS MOTION TO ENFORCE PRIOR COURT ORDERS

HUMANE SOCIETY OF SANTA CLARA VALLEY POSITION STATEMENT

POSITION ON CIRCUS ANIMALS

EFFECTIVE: 5/28/99

The Humane Society of Santa Clara Valley (HSSCV) believes that we must promote respect for and ensure humane treatment of all animals that are in the care of humans. Animals that are traditionally found in the wild (hereafter described as non-domesticated animals), but that have been removed from their natural habitats or have been bred in captivity remain instinctively wild for countless generations. We believe that the interaction between humans and non-domesticated animals is based on the premise that animals must be maintained in their most natural habitat to remain physically and behaviorally sound. If these animals cannot be rehabilitated to their natural habitats, everything possible should be done to simulate that habitat and to provide appropriate food, exercise, psychological stimuli, and medical care.

HSSCV believes non-domesticated animals cannot be adequately cared for in certain conditions of captivity regardless of how they ended up there. The housing space restrictions, travel distances, and climate conditions of travelling circuses do not provide the appropriate habitat for non-domesticated animals. The behaviors, which are demanded of these animals, are not naturally occurring behaviors, and maltreatment of these animals during the training process is widespread. A circus atmosphere is unlikely to provide adequate natural psychological stimuli for these animals, promoting social and reproductive isolation, illness, and even death. Although some people find the performance of "circus animals" to be entertaining, we believe they do so with no awareness of the documented cases of neglect and severe deliberate mistreatment frequently suffered by these animals. The public, especially the children, receive no positive educational benefit from watching these animals perform.

In addition, there is a concern for public safety due to either disease transmission and/or potential injury to humans and property as a result of stress related violent outbursts by circus animals.

Therefore, HSSCV disapproves of the use of non-domesticated animals in circuses. Adequate legislation does not exist for the protection of these animals. No legislation can give back to these animals what they are missing instinctively and physically by living in the confinement required by constant travel. Also, the risks posed to public safety are genuine and significant.

We encourage members of the communities of Santa Clara Valley to support circuses utilizing only human entertainment. Such circuses have proved they can prosper without using animals. We hold out hope that they will someday become the traditional family circuses.

APPROVED BY THE BOARFOF DIRECTORS:

Sally Rademaker, Board Secretary

Christine Arnold

Executive Director