

**PLAINTIFFS' EXHIBIT 34**

To Plaintiffs' Opposition to Defendant Feld  
Entertainment, Inc.'s Motion for Leave to Amend  
Answers to Assert Additional Defense and Rico  
Counterclaim  
Civ. No. 03-2006 (EGS/JMF)

**From:** Case, Allison  
**Sent:** Monday, July 26, 2004 06:16 PM  
**To:** Andacht, Jim; Gaipo, Mark  
**Cc:** Lindsay, William;  
**Subject:** watering and petting zoo

Greetings Jim and Mark,

I continue to have concerns about animal watering on the red unit. In my recent visit to Houston, I found all species water buckets to be in unacceptable condition – e.g. feces or food in water, water level too low, and/or poor quality water. The red unit uses a system of watering from a limited number of large drums instead of hoses with running water. One of several problems with the dispensing of all animal water from a few large drums is the quality or content of the “water” in the drums. I have witnessed both soapy water and, in Houston, bleach water being dispensed to the animals. In both cases the large dispensing drum was being “cleaned” or “soaked” but the grooms are not aware or are not able to recognize when this is taking place. Another major problem with this system is the overall incompleteness of cleaning water buckets and difficulty in watering fully.

I have voiced these concerns before and have recommended a solution: make working water hoses available to each animal department. This would not only make watering easier for the grooms (thus it might actually get done), but more importantly, it would provide an unlimited supply of fresh water for the animals and for their buckets to be properly cleaned. I am aware that in indoor compounds this is more difficult, but I have seen it work well even indoors.

It has also been brought to my attention by more than one person that the elephants are not receiving enough water “so as to minimize the amount they urinate”. I did notice very dry hard feces and in reflecting on my three days, did not happen to see any urination. I asked Sacha directly if his grooms were watering the elephants enough and I was told “yes, three times a day”. Perhaps this is worth investigating. It is certainly worth rectifying.

Finally, I know you have both been made aware that the unexpected petting zoo presents a significantly clear and present health risk to our animals and possibly even to the Ringling staff who make contact with these animals. I just want to introduce another problem with this situation: I was surprised to see the petting zoo staff wearing Ringling shirts. From my understanding, these people are not Ringling staff and their animal husbandry practices certainly do not reflect those of our veterinary care department. They interact very closely with the public during open house and by wearing Ringling shirts they misrepresent themselves as RBBB employees and also suggest the animals are RBBB animals. My concern is we have no idea what their message is in their interactions with the public. I would hope there would not be future joint exhibits, but if so, outside organizations should be in a separate location and clearly identified with their own brand.

Thank you both for your time and consideration,

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