

PLAINTIFFS' EXHIBIT 12
To Plaintiffs' Motion Under Rule 11
Against Defendants And Their Counsel
Civ. No. 03-2006 (EGS/JMF)

Privacy Act Notice on Reverse

AFFIDAVIT

I, (name of affiant) [redacted] being duly sworn on oath make the following statement:

Freely under oath to Mr. Samuel Santiago who has identified himself as an Investigator with USDA, APHIS, INVESTIGATIVE & ENFORCEMENT SERVICES. I am an [redacted]

[redacted] FELD ENTERTAINMENT INC. DBA RINGLING BROS. AND BARNUM & BAILEY CIRCUS. I have been in this organization since [redacted] The phone contact is [redacted]

My postal address is [redacted]

Investigator Santiago has inquired regarding a complaint of abuse of the elephants in the Blue Unit. There has not been any abuse of any of the elephants. I have never seen the elephants beaten. I have never seen [redacted] abuse the elephants. [redacted] has a good rapport with the animals. If I ever saw anyone abusing the elephants, I would stop them and report it immediately. I have seen injuries on elephants, but those injuries were inflicted by the elephants themselves. The bull hook is used properly by all personnel that handle the elephants. I stay away from Karen because she has been known to knock people around. Karen is not a hazard to the general public. She feels comfortable working with several of the trainers or handlers. I work with her as long as one of these people is present with me. I do not work directly with the baby elephants. I have had this statement read to me and I had the opportunity to change and correct this sworn statement, which is true and correct to the best of my knowledge.

SIGNATURE OF AFFIANT [redacted]

Subscribed and sworn to before me at Sunrise, Florida on this 8th day of January, 1999

