

PLAINTIFFS' EXHIBIT 15
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:

[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 in [redacted]

[redacted] FELD ENTERTAINMENT INC DBA

RINGLING BROS. AND BARNUM & BAILEY CIRCUS. I have been this position since [redacted]

[redacted] have been in this organization since [redacted]. The phone contact is [redacted]

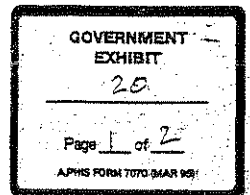
[redacted] My postal address is [redacted]

Investigator Santiago has inquired regarding a complaint of abuse of the elephants in the Blue Unit. The use of the ankus is to guide the elephants and to reinforce verbal commands given to them. I am not aware of abusive use of the ankus with the elephants. I deny having abused any of the elephants as claimed in the complaint. I have a very good relationship with the elephants, especially the babies, Benjamin and Shirley. There is no abuse of any of the elephants. I treat these elephants as my children. I care for them very much, and I direct them with verbal communication and with the ankus to support my verbal communications only if necessary. I use the ankus by touching cue spots on the elephant. I do not use the ankus on the ears. I own only one ankus. It is a small one.

I have not seen any beating of the Blue Unit elephants. The use of the ankus is not done in an aggressive manner. I consider [redacted] to be very professional in handling the elephants. I have never seen [redacted] beat any of the elephants. I have never seen anybody beat Nicole. I would report any animal abuse to Mr. Steele on [redacted] if I were ever to see any abuse. Nicole is low key and docile. She fights sometimes with other elephants, and she is corrected by voice command. The ankus is used only if she does not respond to the vocal command. Two

[redacted signature] SIGNATURE OF AFFIANT

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



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

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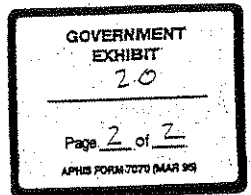
handlers are needed for the separation of elephants which are fighting. I have never seen any injuries inflicted with the ankus on any of the elephants.

Karen can be aggressive against a person who she does not know. She is an animal that I handle and I feel comfortable handling her. She is protective of her space and will show a sign of aggressive behavior if she does not know the person. It is a policy that no one should get close to her without a trainer or handler who she feels comfortable with. Tape is sometimes laid out on the flooring in front of her where she is tethered to mark where people unfamiliar with her shouldn't go. Spray paint is sometimes used on the floor. Neither Karen, nor any of our elephants, is a hazard to the general public.

The space provided to the baby elephants allows them to move freely. An electrical fence pen is frequently used whenever the location permits us to lay out the fence. Shirley is loose most of the day in the pen. Benjamin may be tethered in the pen for some time during the day. They are both tethered in the pen during the night, although if my trailer is located next to the pen, Shirley is not tethered during the night.

I have read and had the opportunity to change and correct this sworn statement which is true and correct to the best of my knowledge.

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SIGNATURE OF AFFIANT

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

[Signature]

PL 04333