

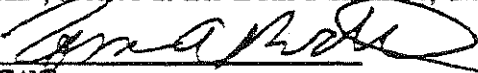
PLAINTIFFS' EXHIBIT 7
To Plaintiffs' Motion Under Rule 11
Against Defendants And Their Counsel
Civ. No. 03-2006 (EGS/JMF)

AFFIDAVIT

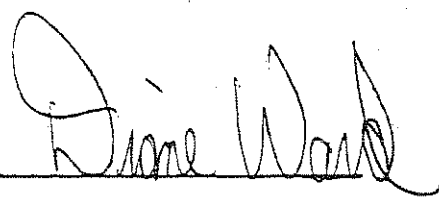
I, (name of affiant) Tom E. Rider, being duly sworn on oath make the following statement to Diane Ward, who has identified herself as an employee of the USDA Investigative and Enforcement Services. I swear the following information is true and correct:

My mailing address is 600 East Holland, Washington, IL 61571. I have worked with elephants since 1997, my first elephant job was with Clyde Beatty Circus. I worked for Ringling Brothers Circus, as a barn man, for 2 1/2 years- from 1997 to November 1999. When I was hired, I was told that if you complain to the USDA or the news media that we would loose our jobs. I traveled with the circus on the road (train). I refused to work the elephants with bull hooks.

I make this statement today to explain the on going abuse of the elephants that I witnessed at Ringling Brothers. The abuse at Ringling Brothers is 6 out of 7 days a week, it is just an on going daily event at every town listed on the route cards. The worst abuse that I witnessed was the following: 1.) in Lubbock, TX (about June 12, 1997)- there was a semi-emergency because of a tornado in the area. The employees started hitting and hooking the elephants to get them out of the tent and into one of the buildings. I saw blood on the trucks of the elephants. It was my job to unchain the elephants, the elephants were panicked and looked like they wanted to run. Graham Chipperfield was in charge of the elephants. 2.) On July 9, 1997, in Tupelo, MS- again a storm was coming in, all the elephants where chained in a line and getting wet, the elephants were starting to get antsy. After the storm, Graham and I unchained the elephants to walk back to the night facility. A cattle truck drove up and scared the elephants and four of them started to run. Graham took off after them and he hooked one elephant (it was Mini) in the front of the trunk and brought her down on the ground. He did stop them from running, but Mini ends up with a 3 inch cut across the trunk. 3.) October 1997, in Detroit- the elephant "Susan" was sick (not eating, diarrhea), I reported it to Gary (Veterinarian with Ringling Brothers). Gary and Graham came out to see "Susan", looked at her from a distance, did no examination, and claimed

Tom E. Rider- 
SIGNATURE OF AFFIANT

Subscribed and sworn to before me at Sacramento, CA
on this 20th day of July, 2000

Diane Ward- 

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the elephant looked fine. I took care of "Susan", and she does recover, but the Vet did not examine her. 4.) October 1997, in Pittsburgh, PA- I witnessed Alex Vargas and Daniel Raffo beating the elephant "Nicole and Sophie". Apparently the elephants did not perform in the show correctly and they were being punished. The people (public) outside the tent could hear the elephants screaming from the beating. 5.) During winter quarters (Nov. 12, 1997)- we were at the fairgrounds in Tampa, FL, where the tents and arena are set up for 2 months. Randy Peterson was sent out from the Ringling's permanent farm (in Florida) to be in charge of the winter barns. At winter quarters it is a relaxing time for the elephants, there is not as much hitting on the elephants except at rehearsals. From Tampa, we moved to St. Petersburg, FL. In St. Petersburg, I saw Graham run from the arena to his truck and get his gun. I found out that Richard Chipperfield (Graham's brother) got attacked by a tiger, and Graham put the tiger in the cage and then shot it 5 times (while it was in a cage). Richard was seriously injured in the accident, he is permanently disabled. After the accident Randy becomes superintendent of animals, replacing Graham (because Graham resigned, due to the accident). After Graham left, the abuse to the elephants gets worse. 6.) February 1998- we were in Nashville, NC, and it was snowing. We were made to walk the elephants 3 1/2 miles in the snow (from the train, to where the show was set up), it was dangerous because it was slippery. 7.) February 1998, in Greensboro, NC- I had been doing a lot of complaining about the animal abuse, Randy wanted to get me out of the circus because of my complaints, Randy knew I didn't like the animal abuse. 8.) February 1998, in Richmond, VA- I saw Jeff Petagrew try to get two elephants (Zina and Rebecca) to lay down. The elephants would not respond to him and he beat the elephants. Immediately after the beating- I saw 24 plus lesions on Zina, and 36 plus lesions on Rebecca. Randy saw what Jeff had done to

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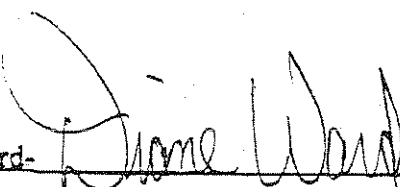
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the elephants, and got mad at Jeff because he was afraid that Mr. Feid would see the wounds on the elephants (Kenneth Feid was visiting the unit on this date). 9.) March/April 1998, in Madison Square Gardens, New York- the elephants got no exercise for 3 weeks. There was no place to exercise them in the city, they tried once to walk them about the block but it didn't work out. At this location 4 people quit work in one day because of the animal abuse- two of their names were Neil and Tony. 10.) May 1998, in New Haven, CT- Pat Harned was beating a young elephant named "Benjamin" because he was messing with the other elephant (Shirley). Another elephant named "Karen" started making noise (by rattling her chain) because Benjamin was getting hit- Pat came over and beat "Karen" for 23 minutes because she would not stop making noise. After Pat was done he asked me to get the "Wonder Dust" so that he could cover up the bleeding on Karen. One of the employees at the time, Rob Lyle, also witnessed this beating. There also was a security guard at the New Haven arena (downtown) who also saw what was going on. 11.) July 1998, in route to Phoenix, AZ- it was over 100 degrees and we were traveling during the day. I was riding with the elephants in the train, the heat was unbearable. The car that transports the elephants is close to the engine, and the heat and smoke from the engines was coming into the train car. I complained to Tommy Henry that I had no way to cool the elephants down, even the water was hot; Tommy said there was nothing we could do. There is no air conditioning in the train cars, and the ceiling vents/lights are always clogged with straw and dirt (they are a fire hazard). I feared for myself and the elephants during this trip, because of the heat. 12.) August 1998, in Anaheim, CA- the elephant "Lechme" was having problems with constipation. We had to "rack" her out (to clean her bowels).. While doing this Lechme accidentally hit me in the eye with her tail. Pat Harned and Randy Peterson hit Lechme because she flicked her tail at me. It

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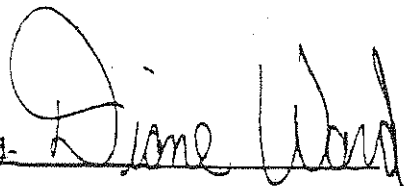
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was just an accident, the elephant did not intentionally hit me, she did not deserve to get hit for this. 13.) August 1998, in San Jose, CA- the Humane Society investigated an elephant bleeding behind the ear. They documented the bloody elephant, but they said they could not prosecute because they could not determine who had best the animal. Ringling Brothers said that the blood was from drawing blood for veterinary care. 14.) September 1998, San Francisco, CA- Randy wanted all the doors (at the Cow Palace) kept closed because the animal activists were trying to film the hitting of the elephants. It was really hot, and the air conditioners were not working, and I had to keep the doors closed and let the animals suffer in the high heat. 15.) October 1998, Denver, CO- "Dateline" was coming to film the animals for animal abuse. Jeff Steele (unit manager) met with us about not abusing the animals while "Dateline" was here, we were instructed not to hit the animals while being filmed. Pat Harned and Kenneth Feld were interviewed by "Dateline" and stated that they never hit or beat the elephants. Of course the handlers do not hit the animals when they know a filming crew is present, or if they know the USDA is coming. 16.) November 1998, Cleveland, OH- it was so cold on the train that I could see my breath. I packed hay in the cracks of the door to try to stop the cold from coming in; there is no heat in the elephant car (only the baby animal car has a heater). 17.) January 1999- Miami, FL- Scott Green is hired as an elephant handler. This man had no elephant experience at all. The first night he worked he was walking elephants into the arena with a "bull hook". Green started hitting the elephants on a regular basis, stating it was discipline. Green was hired by Randy Peterson and Jeff Steele. 18.) January 1999, Jacksonville, FL- Alex Vargas came to visit the circus (he has a trapeze act, and use to work with the elephants), I told Alex about the animal abuse; he said he couldn't do anything about it because he did not want to lose his job (he was still

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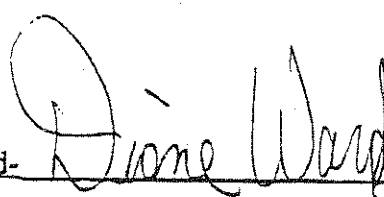
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employed by Ringling, but no longer with the Blue unit). 19.) February 1999, Fayetteville, NC- Rob Lyle (barn man) quit work due to the abuse to the elephants. 20.) March 1999, Cincinnati, OH- the vice presidents of Feld Entertainment (Richard Fremming and John Jamison) were visiting the blue unit while Randy was working on the front feet of the elephant known as "Nicole". Nicole pulled her feet away, so Randy hit her on the head. The vice-presidents witnessed Randy hitting Nicole, and never said a word about it. 21.) April 1999, Chattanooga, TN- Randy and Adam had me drop a side wall on the tent (close the tent), so that they could beat "Sophie and Karen" for playing with each other. 22.) June 21, 1999- the elephant "Nicole" was taken off the train and trucked back to Florida, because of all the scars. They didn't want the USDA to see all the hook marks on her leg, which had swollen. We knew the USDA would be inspecting us, because we were moving from the U.S. into Canada. I have asked numerous people what ever happened to "Nicole", no one knows. 23.) June 1999; Ottawa, Canada- five elephants get into a fight in the exercise pen. We were using the new exercise pen instead of chaining the elephants in a line. All five elephants broke out of the pen, two ran into the horse tent and three continued to fight. I was lucky that the two elephants went into the horse tent, because I was the only one there with the animals and I had no way of stopping the elephants from leaving (they could have easily just ran out into the public street). Adam Hill, Randy, and Pat showed up in about 5 minutes with bull hooks and start beating on the elephants to stop the fight. I got in trouble for not beating the elephants to stop the fight. Adam Hill was in charge of the barn at that time. 24.) August 1999; Dallas, TX- I found out that "Benjamin had died". The baby elephant known as "Benjamin and Shirley" travel separately from the group in trucks, with Pat Harned. Pat was always beating on Benjamin; because he was a young bull elephant and was

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Diane Ward- 

APHIS FORM 7162 Replaces VF Form 3-593 which is obsolete
(NOV 92)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,
AUTHORITY NO. 2414

AFFIDAVIT

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full of play. 25.) October 1999, travel from Detroit to Boston- it very cold, snowing and the elephants were freezing cold; there was not heat on the train car.

About the USDA Inspections: During my employment at Ringling Brothers, we always knew a few days a head of time (up to a week in advance) of any USDA inspection (this happened at least 5 times). Randy Peterson or Adam Hill would come and tell me a few days before the inspection to get the place cleaned up because the USDA Inspector would be here on a certain day. Either Randy and David Keyser always showed the USDA around; we were told not to answer any questions for the USDA. The USDA would never do there inspections in the evening when the abuse is happening. The ideal time to do an inspection would be right before a show (because that is when they are hitting the elephants). The USDA does not inspect every animal, just what Randy wants to show them. If the USDA would inspect each animal behind the ears, behind the leg, and around the tail; they would find gross scarring and lesions. I never saw the USDA do a close inspection of the elephants.

The people employed by Ringling Brothers who abused animals daily were Adam Hill, Pat Harned, Randy Peterson, Scott Green, Jeff Petagrew, Robert Ridley, Jeff (known as "Cowboy"), James (from the Ringling farm in Williston, FL), Dave McFarland, Steve Heart, Josh, Dave Whailey, Dave Wiley, Daniel Raffo, and Gary Jacobson (baby trainer). These people use excessive hooking and hitting with the bull hooks, and hooking the elephants then giving them commands (they just hook the elephant for no reason, they never even give the elephant a command so how could she have disobeyed). I witnessed most of the animal abuse from 6 p.m.

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to 10 p.m- which is when the handlers came to work with the elephants. I saw baby Benjamin systematically abused, 5 to 6 times a day, by Pat Harned; this included verbal abuse all the time. Adam Hill was extremely violent with the elephants, he is now working at Clyde Beatty Circus.

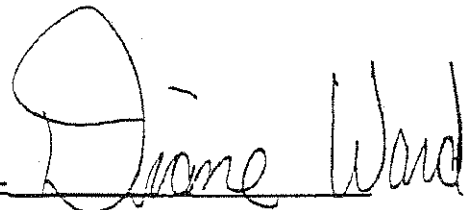
In the 2 1/2 years that I was employed at Ringling Brothers, I saw at least 69 people hired to work with the elephants in the blue unit. All of these people either quit, were fired, or left for some other reason. Most of these individuals had no prior experience working with elephants.

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

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