UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

AMERICAN SOCIETY FOR THE PREVENTION OF CRUELTY TO ANIMALS, et al.,

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Plaintiffs,

v. : Case No. 03-2006 (EGS/JMF)

RINGLING BROS. AND BARNUM & BAILEY CIRCUS, et al.,

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Defendants.

DEFENDANT'S OPPOSITION TO PLAINTIFFS' MOTION UNDER RULE 11

EXHIBIT 4

Tom Rider's Evolving Story

	(Succession)	Ex. 67, Rider PAWS Statement
	Officero	Ex. 68, Rider Congressional Statement
(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 trunks of the elephants. It was my job to unchain the elephants were panicked and looked like they wanted to run. Graham Chipperfield was in charge of the elephants."	"The abuse at Ringling Brothers is 6 out of 7 days a week. The worst that I witnessed was the following."	Ex. 69, Rider USDA Affidavit (7/20/00)
"June 12-15, 1997, Lubbock, TX. We had a tornado coming and the elephants were acting up and so everybody grabbed their bull hooks, all the handlers, except me, started going after the elephants, started hooking them, and making them get their legs up."	(0/5)(4)	Ex. 70, Rider Original Interrogatory Responses, No. 11
	"The length of time it would have taken to do a day by day [description of what he saw in his USDA affidavit] just I have seen this hooking and that hooking would have been a very, very, very, long tedious process. So I explained it was an everyday occurrence." Ex. 73, Rider Dep. at 297 (10/12/06).	Various Statements in Other Contexts, Including Complaints
The version of this incident in the 2004 interrogatory answer leaves out the part about getting the elephants out of the tent and into the building and out of the way of the storm. The second version of this incident therefore clearly suggests that the elephants were hooked to subdue them, not to move them to shelter.	What Rider actually told the USDA is "6 out of 7 days" which is not "everyday."	Comments &

This account was omitted		July 3-6, 199/,			
distinguishes between "beating" and "thumping them one time" which is acknowledged by Rider to be a disciplinary measure. That distinction appears nowhere in the USDA affidavit or the 2004 interrogatory answer.		Basically the same thing hooking, poking, stabbing by the handlers. Whenever they came in to clean the elephants, they started hooking and hitting them."			talking about both hands on the hook and severely beat them three or four times on the head. Not just thumping them one time, well, that was their, quote, discipline for the elephants, is smack them on the head." [Tr. p. 64-65.]
This account was omitted from the PAWS statement and the USDA affidavit. The PAWS statement		OK. The whole time, the elephants were being hit, hooked, yelled at." "June 27-29, 1997,			"When I say
This account was omitted from the PAWS statement and the USDA affidavit.		"June 19-22, 1997, Little Rock, ARK. In Little Rock they were doing a lot of hooking and hitting. In Little Rock, the elephants were taken off the train, put into a building, and chained up 24/7. The only time they were unchained was to do the show or rehearse."			
Comments	Various Statements in Other Contexts, Including Complaints Rider Claims He Made About Abuse:	Ex. 70, Rider Original Interrogatory Responses, No. 11 (63/04)	Ex. 69, Rider USDA Affidavit (7/20/00)	Ex. 68, Rider Congressional Statement (6/13/00)	Ex 67, Rider PAWS Statement (3/25/00)

The statement to the congressional committee in June 2000 was in connection with a bill that would have banned elephants from traveling	running. Again, everybody was hooking and poking and stabbing the elephants."	actoss are name.	of injury to innocent	went and got Karen and was
The statement to the congressional committee in June 2000 was in connection with a bill that would have banned elephants from traveling	running. Again, everybody was hooking and poking and stabbing		could have caused a lot	went and got
The statement to the congressional committee in June 2000 was in connection with a bill that would have banned	running. Again, everybody was hooking		ן שטוול מצוטעוום, זי	
The statement to the congressional committee in June 2000 was in connection with a bill tha	running. Again,		לו המווחים המוחות הל	dumpster, he
The statement to the congressional committee in June 2000 was in		ends up with a 3 inch cut	the day, with a lot of	move the
The statement to the congressional committee	trying to stop her from	from running, but Mini	had occurred during	around with, to
elephants. The statement to the	he almost tripped her	ground. He did stop them	to catch them. If this	the truck, wagons
elephants.	her under her leg so hard		and the trainer was able	harlums that pull
elephants.	off and Graham hooked		which stopped them	one of the
	the front, and Karen took	···	police cars in their path	to come over,
allegedly runaway	running and Karen was in	them and he hooked one r	and there were some	one of the harns
incident regarding	elephants in front took off		Luckily, it was at night	waiting to get
reference at all to an	cattle truck and the	them started to run.	straight down the road.	and, instead of
to one side. He makes no	elephants, we passed the	of	took off running	was inpatient
used to push a dumpster	the train and load the		Minnie and Mysore	door. Graham
the elephant Karen was	finally got ready to go to	the night facility. A cattle	the cattle and she,	in front of the
PAWS, was the fact that	the place. When we		front, was startled by	dumpster sitting
to Rider's statement to	lightning striking all over	and I unchained the	Karen, who was in the	and there was a
about Tupelo, according	elephants out there, with	·····	stopped to let us pass.	to the stock cars
the only thing remarkable	decided to leave the	were starting to get antsy.	train and a cattle truck	and we got down
it "very specifically." Yet	Graham Chipperfield	getting wet, the elephants	walk returning to the	doing a load-out
oath, that he remembered	down on load out.	chained in a line and	were on the elephant	mind. We were
and Rider states, under	The tent was already	the elephants were	Mississippi, when we	them comes to
in time to this incident.	thunderstorm move in.	storm was coming in, all	running was in Tupelo,	of '97 one of
statement was the closest	Miss. We had a major	Tupelo, MS – again a	with an elephant	Mississippi, July
The March 2000 PAWS	"July 8-9, 1997, Tupelo,		"My first experience	"Okay, Tupelo,
	them."			
	would hit or yell at			
	that would walk up,			
at them."	panicky and everybody			
walk up would hit or yell	elephants were getting all			
"everybody that would	on the 4 th of July and the			
extremely unlikely that	fireworks were going off			
affidavit. It also is	nobody cared whether the	r		
statement and the USDA	remember in Memphis			
from the PAWS	Memphis, TN. I			
Jaims He Made bout Abuse.	(0/3/04) Adder Claim		(original)	(0) 2000
ing complaints	DISTRICT TO STATE OF	The state of the s	(00/2/03)	13/25/00
Contexts,	Oth	CIPOLON CONTRACTOR	Statement Statement	Statement
rious Statements in Comments	Inal Ya	Tiem A water	EA, 00, Nute	PANC TARE

the people in the	the record with	he able to verify	sunk a big hole	but, I mean, she	(unintelligible)	know if Karen	sideways. I don't	flipped it over	dumpster and	brand new	foot hole in that	sunk about a 3-	dumpster and	that. She hit the	and yanked like	behind her leg	the hook right	because he put	the dumpster	Karen rammed	dumpster.' And	'Karen, move the	at her. He said,	and he screamed	yanked her back	hooked her and	hard enough. He	wasn't trying	course she	push it. Of	was trying to	push it. Karen	making Karen	(000)	1305/00	PAWS	EX. 0/, MIGEL
																																propic.	neonle "	(paicria)	100/21/9/	Congressional	EX. 08, Kider
																													•						(110,107)	USUA Affidavit	Ex 69, Kider
																																	· · · · · · · · · · · · · · · · · · ·	(au)ca)	Kesponses, No. 11	Interrogatory	Ex. 70, Rider Origina
																	***************************************																September 10000	Koder Claims He Made	100	Other Contexts,	Various Statements in
The USDA affidavit and the 2004 interrogatory		elephants.	the means of stopping the	emphasize the hooking as	omit the police cars and	elephants; later versions	have caught the	the handlers would not	but for the police cars.	statement suggests that,	2000 congressional	The narrative in the June	from the other versions	Mysore - that is omitted	"running" elephant -	also adds another	congressional statement	The June 2000	as opposed to a storm.	simply by a cattle truck	the elephants are startled	Congressional statement	answer. In the June 2000	2004 interrogatory	USDA affidavit and the	details included in the	lightning which are	there was a storm with	statement does not	2000 congressional	i nerefore Rider's June	allegedly "dangerous."	The second secon		一方 の の の の の の の の の の の の の の の の の の の		Comments

"Jackson, Mississippi. There I remember having them out, and one thing I felt was very cruel, it	(unintelligible) company. Just ask them if they got a dumpster that has a big ol' elephant hole hit in the side where it dented it. That was Tupelo, Mississippi. That was early on in my travels with them. And I remember that very specifically." [Tr. at pp. 43- 44.]	Ex. 67, Rider PAWS Statement (3/25/00)
		Ex. 68, Rider Congressional Statement (6/13/00)
		Ex. 69, Rider USDA Affidavit (7/20/00)
"July 11, 1997, Jacksonville, MS. A lot of hooking and hitting of the elephants by Jeff Pettigrew, Franko, Sonny. I can't recall all the handlers, anybody that		Ex. 70, Rider Original Interrogatory Responses, No. 11 (6/3/04)
		Various Statements in Other Contexts, Including Complaints Rider Claims He Made About Abuse.
The Mach 2000 PAWS statement was closer in time to the events, but when asked about it, all Rider could relate about Jacksonville was that it was "cruel" for the	answer, which are submitted in support of claims of "elephant abuse" tell a different story. They omit any reference at all to the police cars being the reason the elephants were stopped and emphasize what Rider claims were the "hooking," stabbing" and "poking" – none of which is described in either the PAWS statement or the June 2000 congressional statement. In the USDA affidavit, four elephants ran; by the time Rider submitted the 2004 interrogatory answer, he implied that all of the elephants were running. In the USDA affidavit, Mini [sic] was the one "hooked;" in the 2004 interrogatory answer it was Karen.	Comments

nowhere mentioned in the					the heat is not
"chaining" which is					downstairs. But
emphasis is upon					lot of cold air
answer in which the					We didn't have a
2004 interrogatory					extremely hot.
Houston events in the		them inside."			them off. It was
description of the		Sometimes we watered			outside, wash
omitted from the		was to get water.			would take them
acknowledgement is		time they went outside			were inside. We
Asian elephants. That		chained up. The only			it was. They
not a significant issue for		downstairs all in a row			summer, how hot
Houston, Texas, heat is		up putting the elephants			Houston, the
acknowledges that the		Houston, TX. We ended			remember about
The PAWS statement		"July 15-27, 1997,			"The only thing I
					44.]
					wind." [Tr. p.
					to the cold
					There was a chill
					what, July?
· · · · · · · ·					on. This was,
					to put our coats
					We basically had
					very cold rain.
					them. It was a
statement					coming in on
mentioned in the PAWS					the water was
none of which was					blowing so hard,
hooking and hitting."					wind was
an instance of 'lal lot of					awning. But the
Jacksonville stands out as					underneath an
"cold rain." instead					were outside
mention is made of the		o,	**		breeze and they
Four years later no		stabbing."			very, very cold
rain in July in Florida		doing the hitting and			and we got a
elephants to be out in the		had a bull hook was			started raining
	Rider Claims He Made About Abuse	(65/04)	(Vizono)	(6/13/00)	(3/25/00)
	Other Contexts	Interrogatory	USDA Affidavit	Congressional	FAWS
Comments	Various Statements in	Ex. 70, Kider Original	Ex 69, Kider	EX. 08, Kluer	EX-07-Maei
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d. Congressional USDA Affidavit Res (613/00) Res (613/00) Res (613/00) d						upset about that
Congressional USDA Afridavit Responses No. 1 (7/20/00) (0/13/00) (0/13/00) (0/13/00) (0/13/00) (0/13/00) (0/13/00) (0/13/00) (0/13/00) (0/13/00) (0/13/00) (0/13/00) (0/13/00) (1/13/00)						long. I started
Congressional USDA Affidavit Responses, No. 11 (720/00) Responses, No. 11 (6/13/00) Responses, No. 11 (6/13/00) Responses, No. 11 (6/13/00) Responses, No. 11 (Refer Cantant), Including Compilating Compilati						been here very
Congressional USDA Affidavit Responses No. 11 (720/00) Responses No. 11 (6/30/0) Responses No. 11 (6/30/0) Rider Calams He Made (6/30/0) Rider Calams He Made (6/30/0) About Abuse. "July 30 - August 10, 1997, Dallas, TX. There we had elephants in a patio behind the parking deek on the bottom, first level. Again, there was a lot of hirting, stabbing, and poking of the elephants with bull hooks. Systematic daily abuse is what I call it."						because I haven't
Congression USDA Affdavit Reporses, No.11 Reporses, No.11 Reporses, No.11 Reporses, No.11 Rider Canno He Made About Abuse About Abuse "July 30 - August 10, 1997, Dallas, Tx. There we had elephants in a patio behind the parking deck on the bottom, first level. Again, there was a lot of hitting, stabbing, and poking of the elephants with bull hooks Systematic daily abuse is what I call it."						watch my mouth
Congressional USDA Affidavit Responses, No. 11 (613/00) Responses, No. 11 (613/00) Responses, No. 11 Rider Claims He Made About Abuse About Abuse "July 30 - August 10, 1997, Dallas, TX. There we had elephants in a patio behind the parking deck on the bottom, first level. Again, there was a lot of hitting, stabbing, and poking of the elephants with bull hooks. Systematic daily abuse is Systematic daily abuse is			what I call it."			that I better
Congressional USDA Atfidavit Enterrogatory Other Contexts, including Compilaint (6/13/00) Responses, Vo. 11 Including Compilaint (6/13/00) Responses, Vo. 11 Including Compilaint (6/13/00) Rider Claims He Made About Abuse. About Abuse. 4 About Abuse.			Systematic daily abuse is			got this feeling
Congressional ISDA Affidavit Enterrogation; Other Competits in (7/20/00) Responses, No.11 Including Complaints (6/13/00) Responses, No.11 Including Complaints (6/13/04) Responses, No.11 Including Complaints (6/13/04) Responses, No.11 Including Complaints (1/20/04) Responses, No.11 Including Charmy He Made About Abuse. About Abuse. 10/13/00) "July 30 - August 10, 1997, Dallas, TX. There we had elephants in a patio behind the parking deck on the bottom, first level. Again, there was a lot of hitting, stabbing, and poking of the			elephants with bull hooks.			stuff, and kind of
Congressional USDA Afflavit (720/00) Responses, No. 11 (6/13/00) Responses, No. 11 (6/30/04) Responses, No. 11 Rider Claims He Mide About Abuse. About Abuse. "July 30 - August 10, 1997, Dallas, TX. There we had elephants in a patio betind the parking deck on the bottom, first level. Again, there was a lot of hitting, stabbing,			and poking of the			elephants and
Congressional USDA Affdavit (720/00) Responses, No. 11 (6/13/00) Responses, No. 11 (6/13/00) Responses, No. 11 Responses, No. 11 Rider Claims He Mide About Abuse. About Abuse. 1/10/1/20/00 1/10/1/20			lot of hitting, stabbing,			hooking the
Congressional USDA Affidavit Statement (6/13/00) Responses, No.11 Responses, No.11 Reducing Compaints Responses, No.11 Reducing Compaints Responses, No.11 Reducing Compaints Reducing Compaints Reducing Compaints Responses, No.11 Reducing Compaints Reducing Compaints Responses, No.11 Reduc	elephant treatme		level. Again, there was a			about people
Congressional USDA Affidavit (047000) Responses, No. 11 (04704) Responses, No. 11 Responses, No. 11 Responses, No. 11 Reducting Complaints (04704) Responses, No. 11 Reducting Complaints (04704) Responses, No. 11 Reduct Claims He Made About Abuse. July 30 - August 10, 1997, Dallas, TX. There we had elephants in a patio behind the parking	started to complain		deck on the bottom, first			complaining a lot
Congressional (7/20/00) Statement (6/13/00) (6/30-0)	the point at which I		patio behind the parking			after that I started
Congressional USDA Affidavit Statement (7/20/00) Response, No. 11 (6/13/00) Response, No. 11 Rider Claims He Made (6/2004) Rider Claims He Made About Abuse "July 30 - August 10, 1997, Dallas, TX. There	reference to Dallas		we had elephants in a			Dallas or shortly
Congressional USDA Affidavit Statement (7/20/00) Responses, No. 11 (6/13/00) Responses, No. 11 Rider Claims the Made About Abuse "July 30 - August 10,	answer makes n		1997, Dallas, TX. There			Dallas, it was
Congressional USDA Affidavit Statement (6/13/00) (6/13/00) (6/13/00) Congressional USDA Affidavit Responses, No. 3 i Rider Claims He Made About Abuse	The 2004 interroga		"July 30 - August 10,			"I'd say about
Congressional USDA Affidavit Statement (7/20/00) Responses, No. 11 (6/13/00) Responses, No. 12 (6/39/4) Responses, No. 12 Rider Contexts, Including Compisints Rider Claims He Made About Abuse.						[Tr. p. 46.]
Congressional USDA Affidavit Statement (6/13/00) (6/13/00) (7/20/00) Congressional (7/20/00) Responses, No. 11 (6/13/04) Rider Claims He Made About Abuse.	and the second second					care of the girls."
Congressional Congre						and start taking
Congressional USDA Affidavit (6/13/00) (6/13/00) Congressional USDA Affidavit (6/304) Responses, No. 11 (6/304) Rider Claims He Made About Abuse.						to get in there
Congressional USDA Affidavit Statement: (6/13/00) (6/13/00) (6/13/00) Responses, No. 11 (6/3/04) Responses, No. 11 Rider Claims He Made About Abuse.						because I wanted
Congressional USDA Affidavit Interrogatory (7/20/90) Statement (6/13/90) (6/13/90) Congressional USDA Affidavit Interrogatory Responses, No. 11 (6/13/94) Responses, No. 11 (Rider Claims He Made About Abuse.	-					at that point
Congressional USDA Affidavit Statement (6/13/00) (6/13/00) (Congressional (Congre						really wanted to
Congressional USDA Affidavit (7/20/00) Statement (6/13/00) (6/13/00) Congressional USDA Affidavit (7/20/00) Responses, No. 11 Rider Claims He Made About Abuse.						be barn man. I
Congressional USDA Affidavit (7/20/00) (6/13/00) Congressional (6/13/00) Congressional (7/20/00) Responses, No. 11 (6/3/04) Rider Claims He Made About Abuse,						about wanting to
Congressional Congressional Statement (6/13/00) (7/20/00) (6/3/04) Congressional Congressional Congressional (6/13/00) (6/3/04) Congressional Congressi	Table Market					talked to me
Congressional Congressional Statement (6/13/00) (7/20/00) (6/3/04) Congressional USDA Affidavit Responses, No. 11 (6/3/04) Rider Claims He Made About Abuse.						That's when he
Congressional Congressional Statement (6/13/00) (6/13/00) Congressional USDA Affidavit Responses, No. 11 (6/13/04) Rider Claims He Made About Abuse.						Chipperfield.
Congressional Congressional Statement (6/13/00) (6/13/00) Congressional USDA Affidavit Responses, No. 11 (6/3/04) Rider Claims He Made About Abuse,						still Graham
Congressional Congressional Statement: (6/13/00) Congressional USDA Affidavit Responses, No. 11 (6/13/00) Responses, No. 11 (6/3/04) Rider Claims He Made About Abuse.						basically, was
Congressional USDA Affidavit Interrogatory Other Contexts, Statement (6/13/00) (6/13/00) Congressional USDA Affidavit Interrogatory Other Contexts, (6/3/04) Responses, No. 11 (6/3/04) Rider Claims He Made About Abuse						Houston, Texas,
Congressional USDA Affidavit Interrogatory Other Contexts, Statement (6/13/00) (6/13/00) Congressional USDA Affidavit Interrogatory Other Contexts, (6/3/04) Responses, No. 11 (6/3/04) Rider Claims He Made About Abuse.						That's where,
Congressional USDA Affidavit Inferrogatory Other Contexts, Statement (7/20/00) Responses, No. 11 Rider Claims He Made (6/13/00) About Abuse.	Statement to FA					them all that bad.
Congressional Statement (6/13/00) EX. 05, Kluer (6/3/04) EX. 07, Kluer Original USDA Affidavit Interrogatory (6/3/04) Responses, No. 11 (6/3/04) Rider Claims He Made About A buse	Mark DAY	S. C. Company				going to hurt
Congressional IISDA Affidavit Interpository	omplaints He Made	Including Co Rider Claims	Responses, No. 11 (6/3/04)	(7/20/00)	Statement (6/13/00)	Statement (3/25/00)
	<u>in</u>	Various State	Interrogation	DSDA Affidavir	Congressional	PAWS

		was a lot of hitting and			A STATE OF THE STA
i		time, and, again, there			
affidavit.		Superdome the whole			
statement and the USDA		elephants were inside the			
from the PAWS		New Orleans, LA. The			
This account was omitted		"August 21-24, 1997,			
		elephants."			
		hooked and hit the			
		up the elephants, they			
		handlers come in to clean			
		Again, every time the			
		rehearsing or performing.			
		when the animals were			
		the whole time, except			
		No exercise, chained up			
affidavit.		building the whole time.			
statement and the USDA		elephants were inside the			
from the PAWS		Worth, TX. The			
This account was omitted		"August 15-17, 1997, Ft.			
					[lr. pp. 46-47.]
			•		happen to me."
					of what could
					because of fear
					about it and stuff
•					mouth too much
					opening my
					and not really
					stuff going on
					just seeing the
					year was really
					portion, the first
					them. But that
					mentioning it to
					(unintelligible)
	TOTAL OF THE PART				stuff and
STATE OF THE PARTY	About Abuse	Constant		が という は 一番	
	icluding Compla	Kesponses, No. 11	(0000211)	(00/E1/9)	3/25/00)
The second secon	Other Contexts,	interrogatory	USDA AIIIGAVII	Congressional	A TO TO
Comments	Various Statements in	Ex. 10, Ruger Original	Tigny America	Commontonal	PAWS
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water trucks through the blacktop between the arena and where we load them in this little town. It didn't happen, of	"[O]nly thing I can remember about Wichita, Kansas in '97. I remember that was a (unintelligible) walk-out when we left. It was like a three anda-half to four-mile walk that we do. It had to be 95 or 100 degrees out. We took off walking across the pavement was I remember it being so hot, that Graham wanted to water down the pavement on the road, to see if you could get	Ex. 67, Rider PAWS Statement (3/25/00)
		Ex. 68, Rider Congressional Statement (6/13/00)
		Ex. 69, Rider USDA Affidavit (7/20/00)
	stabbing the elephants with bull hooks." "August 29-31, 1997, Wichita, KS. Basically the elephants were inside the coliseum there, kept inside the whole time. A lot of hooking went on, whenever the handlers laid the elephants down, they hooked them."	Ex. 70, Rider Original Interrogatory Responses, No. 11 (6/3/04)
	About Abuse,	Various Statements in Other Contexts, Including Complaints Rider Claims He Made
	The March 2000 statement to PAWS was closer in time to the events in question, but the "only thing" Rider remembered about Wichita, Kansas, was the heat and the purported lack of water for the elephants. Four years later, none of this is mentioned in the 2004 interrogatory answer. Instead, Wichita is another town in which "[a] lot of hooking went on."	Comments

somebody come	A water truck or	have some water.	least stop and	they should at	walking like that,	kind of heat and	girls are in that	still, when the	mile walk but,	a three and-a-half	feeling. It is only	That was my	watered halfway.	should have been	water. They	drank a lot of	the stocks. They	them right after	when I watered	water that day	drank a lot of	walked, they	pace they	them. At the	that day walking	was outrageous	minute. The heat	rest them for a	halfway just to	stopped maybe	was very we	walk in particular	remember that	course. But I	Ex. 67, Rider PAWS Statement (3/25/00)
																																			Ex. 68, Rider Congressional Statement (6/13/90)
										77 m T m T																									Ex. 69, Rider USDA Affidavit (7/20/00)
																																			Ex. 70, Rider Origina Interrogatory Responses, No. 11 (673/04)
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																																			Comments

PAWS Stricement (A72000) Application (A7300) Appl			hit the elephants all the			
Congressional USDA Affidayii (C1300) Reponses, No.11 Rider Claims It extends Rider Claims It extends About Abuse. About A			show or maybe rehearse.			
Congressional USDA Affidivit (7/20/00) Reponses. No. 1.1 Rider, Chimis He Made (6/304) Rider, Chimis He Made About Abuse. Sept. 9-12, 1997, Milwaukee, WI. Again, the elephants were hooked and hit. I remember when the handlers came in to clean up the elephants, and they would always be hooking and hitting them." "Sept. 9-12, 1997, Moline, II. The elephants were outside in a tent, chained up 24 hours a day. The only time when they were			unchained was to do a			
Congressional USDA Affidivit Interruptiony (6/13/00) Responses, Vo. 11 Rider Chima He Made (6/3/04) Sept. 3-7, 1997, Greenbay, WI. The elephants were mistle, and getting booked all the time. I was getting yelled at because I was complaining about people hooking the elephants." Ex. 70, Rider Original Interrogatory Responses, No. 15 (6/3/04). Moline, II. The elephants were outside in a tent, chained up 24 hours a day. The only			time when they were			
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Congressional Statement (7/20/00) I took care of 'Susan,' and she does recover, but the Vet did not examine her." Took care of 'Susan,' the Vet did not examine her."	Rider's description of Alex Vargas evolves over	"Oct. 22-26, 1997, Pittsburgh, PA. Alex	"4.) October 1997, in Pittsburgh, PA – I		"Other than that, the daily stuff,
Congressional USDA Affidavit Statement (720/00) I took care of 'Susan,' and she does recover, but her." I took care of 'Susan,' and she does recover, but her." Walked off That is not taking care of an elephant they did. Also, there was hooking and hitting by Jeff Pettigrew." Jeff Pettigrew." "Oct. 8-19, 1997, Boston, M.A. The elephants were inside the whole time and did not get any exercise.		They were chained up for most of the day and getting poked and hit."			
Congressional USDA Affidavir Statement (7/20/00) I took care of 'Susan,' and she does recover, but the vid. Also, there was hooking and hitting by Jeff Pettigrew." Walked off: That is not taking care of an elephant to me, but that is what they did. Also, there was hooking and hitting by Jeff Pettigrew." "Oct. 8-19, 1997, Boston, A. The elephants were in the vide of the content of the conte	statement and the Us affidavit.	did not get any exercise.			
Congressional USDA Affidavit Statement (6/13/00) I took care of 'Susan,' and she does recover, but the Vet did not examine her." her." **More That is not taking care of an elephant they did. Also, there was hooking and hitting by Jeff Pettigrew." **Jeff Pettigrew." **Oct. 8-10, 1007. Boston.** **Cot. 8-10, 1007. Boston.** **Other Connexts.* **Cot. 8-10, 1007. Boston.** **The Test of Statement for the recognition of the Connexts.* **Cot. 8-10, 1007. Boston.** **The Test of Statement for the regions.** **Cot. 8-10, 1007. Boston.** **The Test of Statement for the regions.** **Cot. 8-10, 1007. Boston.** **The Test of Statement for the regions.** **The Test of S	from the PAWS	MA. The elephants were			
Congressional USDA Affidayit Statement (6/13/00) I took care of 'Susan,' and she does recover, but the Vet did not examine her." Walked off. That is not to me, but that is what they did. Also, there was hooking and hitting by Jeff Pettigrew." Left Pettigrew." Party Affidayit Responses, Yo. 11 Rider Claims He Made About Abuse.	2000 statements	"Oct 8 10 1007 Boston			
Statement (7/20/00) USDA Affdavit Statement (7/20/00) I took care of 'Susan,' and she does recover, but the Vet did not examine her." Walked off. That is not to me, but that is what they did. Also, there was hooking and hitting by Jeff Pettigrew." Leave the to graph of the contexts, No. 11 Rider Claims He Made About Abuse.	found in either of				
Congressional USDA Affidavit Statement (613700) I took care of 'Susan,' and she does recover, but the Vetidi not examine her." Walked off. That is not to me, but that is what they did. Also, there was hooking and hitting by Jeff Pettigrew." Jeff Pettigrew." Amout Abuse. Walked off. That is not to me, but that is what they did. Also, there was hooking and hitting by Jeff Pettigrew."	and hitting by Je				
Congressional USDA Affidavit (6/13/00) Statement (6/13/00) I took care of 'Susan,' and she does recover, but the Vet did not examine her." Walked off. That is not to me, but that is what they did. Also, there was hooking and hitting by Jeff Pettigrew." Value Statements in Cother Contexts, College Complaints (6/304) Rider Claims He Made About Abuse. Liceropatory Response, No. 11 Rider Claims He Made About Abuse. Jeff Pettigrew."	statement of "hook				
Congressional USDA Affidavit Statement (7/20/00) Statement (7/20/00) I (0/13/00) I took care of 'Susan,' and she does recover, but the Vet did not examine her." Walked off. That is not taking care of an elephant they did. Also, there was hooking and hitting by Jeff Pettigrew." Jeff Pettigrew."	answer and added				
Congressional USDA Affidivit Statement (7/20/00) I (6/13/00) I took care of 'Susan,' and she does recover, but the Vet did not examine her." her." Walked off. That is not to me, but that is what they did. Also, there was hooking and hitting by Jeff Pettigrew." Jeff Pettigrew." Other Contexts Including Complaints Rider Claims He Made About Abuse About Abuse About Abuse Jeff Pettigrew."	omitted that fact from				[11. p. 30.]
Statement Statement (6/13/00) I took care of 'Susan,' and she does recover, but the Vet did not examine her." Statement (6/13/00) I took care of 'Susan,' and she does recover, but the Vet did not examine her." Statement (6/13/00) I took care of 'Susan,' and she does recover, but to me, but that is what they did. Also, there was hooking and hitting by Jeff Pettigrew." Jeff Pettigrew." Walked off. That is not to me, but that is what they did. Also, there was hooking and hitting by Jeff Pettigrew."	Susan recovered,				whole walk."
Congressional USDA Affidavit Statement (7/20/00) (6/137/00) I took care of 'Susan,' and she does recover, but the Vet did not examine her." Walked off. That is not to me, but that is what they did. Also, there was hooking and hitting by Jeff Pettigrew." Jeff Pettigrew." Other Complaints (6/30/0) Rider Claims He Made About Abuse. Rider Claims He Made About Abuse. Shooking and hitting by Jeff Pettigrew."	USDA affidavit th				We just did the
Statement (6/13/00) I took care of 'Susan,' and she does recover, but the Vet did not examine her." Walked off. That is not taking care of an elephant they did. Also, there was hooking and hitting by Jeff Pettigrew." Took care of 'Susan,' taking care of an elephant they did. Also, there was hooking and hitting by Jeff Pettigrew."	acknowledged in t				never stopped.
Congressional USDA Affidavit Statement (7/20/00) (7/20/00) I took care of 'Susan,' and she does recover, but the Vet did not examine her." Mer." Walked off. That is not to me, but that is what they did. Also, there was hooking and hitting by Jeff Pettigrew." Jeff Pettigrew." Other Contexts, Including Complaints Rider Claims He Made About Abuse. About Abuse About Abuse About Abuse About Abuse Jeff Pettigrew."	Although Rider				something. We
Congressional Statement (613/00) I took care of 'Susan,' and she does recover, but the Vet did not examine her." Walked off. That is not to me, but that is what they did. Also, there was hooking and hitting by Jeff Pettigrew." Jeff Pettigrew." Walked off. That is not to me, but that is what they did. Also, there was hooking and hitting by Jeff Pettigrew."	elephant Susan				mile walk or
Congressional USDA Affidavit Statement (6/13/00) I took care of 'Susan,' and she does recover, but the Vet did not examine her." Walked off. That is not taking care of an elephant the was hooking and hitting by Jeff Pettigrew." Walked off. That is not taking care of an elephant they did. Also, there was hooking and hitting by Jeff Pettigrew."	answer focus on t				three and-a-half
Congressional Statement (7/20/00) I took care of 'Susan,' and she does recover, but the Vet did not examine her." Walked off. That is not taking care of an elephant the what they did. Also, there was hooking and hitting by Jeff Pettigrew." John Contexts Response, No. 11 Rider Contexts Including Complaints Rider Claims He Made About Abuse. Shooking and hitting by Jeff Pettigrew."	the 2004 interroga				between like a
Congressional USDA Affidavit Statement (6/15/00) I took care of 'Susan,' and she does recover, but the Vet did not examine her." Walked off. That is not taking care of an elephant they did. Also, there was hooking and hitting by Jeff Pettigrew." Other Contexts Including Complaints Rider Claims He Made About Abuse About Abuse About Abuse Jeff Pettigrew."	The USDA affidavii				ever stop off and
Congressional (720/00) I took care of 'Susan,' and she does recover, but the Vet did not examine her." Left Pettigrew." Congressional Other Contexts Other Contexts Including Complaints Rider Claims He Made About Abuse About Abuse About Abuse I to me, but that is what they did. Also, there was hooking and hitting by Jeff Pettigrew."					never did we
Congressional USDA Affidavit Statement (6/13/00) I took care of 'Susan,' and she does recover, but the Vet did not examine her." Walked off. That is not to me, but that is what they did. Also, there was hooking and hitting by Jeff Pettigrew." Other Contexts. Interrogatory Rider Claims He Made About Abuse. About Abuse. About Abuse. Jeff Pettigrew."	get enough exerci				but we had them
Congressional USDA Affidavit Statement (6/13/00) I took care of 'Susan,' and she does recover, but the Vet did not examine her." Walked off. That is not taking care of an elephant to me, but that is what they did. Also, there was hooking and hitting by Jeff Pettigrew." Other Contexts Rider Claims He Made About Abuse About Abuse About Abuse Jeff Pettigrew."	captive elephants d				walk a long way,
Congressional USDA Affidavit Statement (6/13/00) I took care of 'Susan,' and she does recover, but the Vet did not examine her." I took care of walked off. That is not taking care of an elephant to me, but that is what they did. Also, there was hooking and hitting by	animal activists t	Jeff Pettigrew."			Sure, elephants
Congressional USDA Affidavit Statement (7/20/00) I took care of 'Susan,' and she does recover, but the Vet did not examine her." I took care of walked off. That is not to me, but that is what the Vet did. Also, there was	fraguent allogation	hooking and hitting by			amazed me.
Congressional Congressional USDA Affidavit Interrogatory Other Contexts, Other Contexts, Including Complaints (6/13/00) I took care of 'Susan,' and she does recover, but the Vet did not examine To me, but that is what	circus elepitants	they did. Also, there was	her."		is something that
Congressional Congressional USDA Affidavit Interrogatory Responses, No. 11 (6/13/90) I took care of 'Susan,' and she does recover, but taking care of an elephant Congressional Interrogatory Responses, No. 11 (6/3/94) Rider Claims He Made About Abuse.	Circus clophonts	to me, but that is what	the Vet did not examine		elephants. That
Congressional USDA Affidavit Statement (7/20/00) (6/13/00) I took care of 'Susan,' Congressional Interrogatory Responses, No. 11 (6/3/04) Rider Claims He Made About Abuse.	long elephant walk	taking care of an elephant	and she does recover, but		walks for the
Congressional USDA Affidavit Interrogatory Other Contexts, Statement (7/20/00) (6/3/04) Responses, No. 11 (6/13/00) (6/13/00) Responses, No. 11 (6/13/00) About Abuse	Stems from the fact	walked off. That is not	I took care of 'Susan,'		extremely long
Congressional USDA Affidavit Interrogatory Other Contexts, Statement (7/20/00) Responses, No. 11 Including Complaints	der ((6/3/04)		(6/13/00)	(3/25/00)
Congressional USDA Affidavit Interrogatory Other Controls	clud	Responses, No. 11	(7/20/00)	Statement	Statement
		Interrogatory	USDA Affidavit	Congressional	PAWS

Alex. Alex wasn't too bad. He would have his days. He was probably one of the very few supervisor types that I seen. He is still with he is with the tent show now. He is one of the very	for the menu that year, we were just constantly seeing more and more figuring out who, at that point, it came to me, who was hook happier than the other person. Who was doing a lot of the beating at that time, it was Jeff Pettigrew, some of your older guys there, Sonny and (unintelligible) quote, acts, the presenters.	Ex. 67, Rider PAWS Statement (3/25/00)
		Ex. 68, Rider Congressional Statement (6/13/00)
	witnessed Alex Vargas and Daniel Raffo beating the elephant 'Nichole 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."	Ex. 69, Rider USDA Affidavit (7/20/00)
	Vargas came back and the elephants were not doing the public walk right and so Vargas and the other handlers got them inside, closed the curtain, and started hitting the elephants, and the elephants were screaming."	Ex. 70, Rider Original Interrogatory Responses, No. 11 (6/3/04)
		Various Statements in Other Contexts, Including Complaints Rider Claims He Made About Above
In the USDA affidavit, the "punishment" of the elephants is for the activities during the performance; in the 2004 interrogatory answer, it is for activities on the public walk.	time. The March 2000 statement to PAWS describes Vargas as "not that bad," as one of the "few supervisors" who "didn't really like using the hook too much" and as a person who would "yell" at others for overusing the guide. The later versions omit these statements about have Vargas and lump him in with the other alleged abusers. It could be reasonably be argued that the omissions stem from the fact that Vargas "yelling" at other for improper husbandry practices demonstrates that FEI does not	Comments 1 40

	(O.1. C.O. 1007 C.			
attidavit.	and getting them on the train, hooking them getting them off."			
from the PAWS statement and the USDA	Buffalo, NY. Again, hooking and hitting all the time. Hooking them			
This account was omitted	"Oct. 29- Nov. 2, 1997,			
				51-52.]
				bad." [Tr. pp.
				They are pretty
				wouldn't stop.
				hooking. They
				they just kept
***************************************				problem was
				much. The
				somebody too
				hooking
				because they are
				somebody
				basis yelling at
				an everyday
				very big thing on
				big that was a
				became quite a
				hook. That
***************************************				they overused the
				few others when
				at Roffo and a
				get kind of upset
				much. He would
				the hook too
				really like using
				seen that didn't
				few that I have
der Claims He Made About Abuse.	(6/3/04) Ri	松 中 一	(0/25/00)	(00/67/6)
50 - U	0.11	(7/20/00)	Statement	Statement
Other Contexts,	Interrogatory	USDA Affidayit	Congressional	PAWS
arious Statements in Commen	Ex 70, Rider Original V	EX 69, Kider	Ex po, Muer	TA OF AUGE

the snow."
repeatedly hooked to make them move faster in
the elephants were
Getting them off the train,
elephants in the snow.
We had 8 inches OI snow We had to walk the
until next morning and
there, instead we waited
unload them when we got
"Jan. 28 - Feb. 1, 1998, Asheville, NC. We didn't
were hooked and hit."
the same the elephants
"Jan. 21-25, 1998.
being cleaned."
and hit when they were
elephants were hooked
(6/3/04)
Responses, No.
Intermout
F PX 70 Ridge Origin

- 1
6
RiderOrigina

complaining about	because I was		wanted to get the out of		mere, arey came
Rider because of Rider's	threatened my job		ammar abuse, Kandy		thora thou came
Randy Peterson to fire	Randy Peterson	the elephants.	complaining about the		half waar tenure
response to a threat by	to the Union, because	reterson art and nooked	compleining shout the		my two and-a-
2006 deposition that, in	Greensboro, MC. I went	Greensboro, NC. Kandy	bear deine a let of		don't know in
Rider admitted in his	"Feb. 11-15, 1998,	"Feb. 11-15, 1998,	"7.) February 1998, in		"I would say that
#11144 YIC		watch."			
statement and the OSDA		elephants - very hard to			
from the PAWS		hooking and hitting of the			
This account was omitted		"Feb. 3-8, 1998,			
					pp. 70-71.]
					elephant." [Tr.
					is a very mean
					somebody. She
					and killed
					into the crowd
					have came back
			***************************************		Karen, she would
					somebody like
					have been
					on. If it would
					problem tacked
					have had a
					ran. We could
				***************************************	it would have
					been an elephant,
					If that could have
					miniature horses.
					hit one of the
					off my shoe and
					but it bounced
					wasn't a big one,
					horse. Luckaly, it
					hit me and the
10名の一般の一般の一般に	About Abuse.		という はい 米のおか	THE PERSON NAMED IN	ははない。
	Bider Claims Hamilaints	(6/3/04) (6/3/04)	(110000)	(6/13/00)	(3/25/00)
の 一年 の は 一大 の 大 の は の に	560	interrogatory.	JARDHIA POCO	Congressional	Statement
Comments : 1	Various Statements in	Ex. 10, Ruder Original	Limbos, Mulei	Canada Musi	DAWK.
Control of the second of the s			A THE STATE OF THE PARTY OF THE	To No Diday	Ty 67 Dider

position of authority because he was constantly fearful of being fired. See Ex. 73, Rider Dep. at 200 (10/12/06) ("Q. You					1 1 Cl 1
position of authority because he was constar fearful of being fired. Ex. 73, Rider Dep. at 2					to Europe, aid i
position of authority because he was constar fearful of being fired.					before I left to go
position of authority because he was constan					Lafara I laft to a
position of authority					agam. I was
FEI to anyone in a					Hevel oomered
					reason I was
while he was employed by					And for some
about elephant abuse					maybe he does.
he did not complain					I hey thought,
frequent assertions that					in at the time.
inconsistent with Rider's					little bit of scare
 a fact that would be 					little bit of some
was never bothered again					of film but it was
rolls of tape gambit, he					had the 16 rolls
once he played the 16					noted I never
stated to PAWS that.					So I was kind of
was made because Rider					film of abuse.
argue that the omission					got 16 rolls of
One could reasonably					careful because I
interrogatory answer					'Well, I would be
and the 2007	, , ,				And I said,
from the USDA affidavit					completely.'
montaine seur sanct 1913,					circus
noint about the phants					you out of the
(10/12/06) However the					'I'm going to get
73. Rider Den at 264					And Randy said,
had no such tangs) Iv	****				North Carolina.
was untrue (hecouse)					Greensboro,
statement in that regard					of me. It was in
	No. 15 (6/3/04)				wanted to get rid
	Interrogatory Responses		abuse."		wanted Randy
"16 rolls" of topo of	Ex. 70. Rider Original		didn't like the animal		about they
	beating the elephants."		complaints, Randy knew I		saying something
e elephant treatment Rider	complaining about people		the circus because of my		up and they were
	About Abuse	(a/3/04)		(00/2/00)	Concret
一年 大学 大学 一年 大学 大学	Including Complaints	Responses, No. 11	(1/20/00)	Statement	Thement
	Other Contexts,	Interrogatory	USDA Affidavit	Congressional	PAWS
Comments	1 Various Statements in	Ex. 70, Rider Original	Ex. 69, Rider	Ex 68, Kuder	EX 0/, Kider

later accounts. In the			Carolina and a did to the		
This detail is added to the			(Kenneth Feld was		28 hook marks
present in Kichmond.		The state of the s	wounds on the elephants		one of them had
Actuach Feld Deling		pay any attention to it"	Feld would see the		them had 23 and
Kenneth Feld being		screaming, and he did not	he was afraid that Mr.		28, that one of
makes no mention of		elephants were	got mad at Jeff because		between 23 and
The PAWS statement		that night when the	done to the elephants, and		but it was
ente it mich capes.		Kenneth Feld showed up	Randy saw what Jeff had		the exact number
and it increases		Zina and 20 on Rebecca.	plus lesions on Rebecca.		can't remember
becomes more definite		about 30 hook wounds on	lesions on Zina, and 36		either 23 or 28. 1
told again, the number		dust and had to cover up	beating – I saw 24 plus		nad It was
account. As the story is	,	had to go get the wonder	Immediately after the		Kebecca, Lyna
stumbles through the	Legislature (1/25/06).	When they were done, I	beat the elephants.		Lyna and
on the elephants, and	72, Statement to Nebraska	who beat them severely.	respond to him and he		Kandy Peterson,
number of "hook marks"	on another elephant." Ex.	Weller and Jeff Pettigrew,	The elephants would not		the first year with
remember the exact	and 20-plus hook marks	being laid down by Andy	Rebecca) to lay down.		would have been
question. Rider cannot	marks on one elephant	Zina and Rebecca were	two elephants (Zina and		Virginia, that
in time to the events in	to cover up 30-plus hook	inside. This is where	Jeff Pettigrew try to get		Richmond,
statement, which is closer	Virginia, we actually had	Richmond, VA. We were	Richmond, VA – I saw		parucular, in
In the March 2000 PAWS	"Down in Richmond,	"Feb. 18-22, 1998,	"8.) February 1998, in		One case in
Kenneth Feld").					5
very scared to go to					pp. 13-16.]
same thing. So, no I was					of times. [1f.
threatened my job, the					of times " Tr
Carolina Randy					par ir aran r norb
Greensboro, North					But it didn't help
Brothers [I[n					said, no. I didn't.
fired from Ringling					long time ago.' I
doing that? A. Getting					used it a long,
Q. What kept you from					did, I would have
couldn't you? A. No sir.					I said, 'Jamie, if I
was if you wanted to,					have the film?
treatment of the elephant					Do you really
problem with the					(unintelligible.)
what you thought the					on the
with in [Neithern Feld]					Jamie, that works
fold him (Vome th E-13)	and menor money	A STANDARD CONTRACTOR OF STANDARD CONTRACTOR			one of the girls,
大きな かいかい 大切がいて	About Abase	一个是我人们的	· · · · · · · · · · · · · · · · · · ·	The state of the s	は大きながら
	Rider Claims He Made	(6/3/04)	(100,000)	(6/13/00)	(3/25/00)
	Other Contexts,	Description	Cloud winds	Statement	Statement
Comments	Various Statements in	ara io, muei originali	IISDA Affidavit	Congressional	PAWS
			FY 60 Bider	Ex 68 Rider	Ex. 67, Rider

to the elephants. In all the time	night but never,	In fact, Feld	her. I got very	hook marks on	She came out	lay Zyna down.	how you have to	in on that trying	working. He was	why he was there	can't remember	day barn man. I	barn man, he was	And John the	Andy Weller got	Pettigrew and	what is the Jeff	said this is after,	one day. We	We counted them	Rebecca had 28	one. I think	Zyna, on each	Rebecca and	on them, between	Ex. 67, Rider PAWS Statement (3/25/00)
																										Ex. 68, Rider Congressional Statement (6/13/00)
																							medanik	date)."	visiting the unit on this	Ex. 69, Rider USDA Affidavit (7/20/00)
																										Ex. 70. Rider Original Interrogatory Responses, No. 11 (6/3/04)
																										Various Statements in Other Contexts, Including Complaints Rider Claims He Made About About
												allu diu nouning about it.	during the alleged abuse	Mr. Feld was present	clear implication is that	interrogatory answer the	vears later in the 2004	arena tater) might see the	(who was coming to the	concerned that Mr. Feld	employees as being	describes fellow	incident abuse and then	describes the alleged	USDA affidavit Rider	Comments

This account was omitted from the PAWS statement and the USDA affidavit.	"Feb. 25 - March I, 1998, Knoxville, VA. The elephants were inside the whole time, on chains, and got no exercise."			
				quiet." [Tr. pp. 17-18.]
		****		kind of kept it
				your job, you
				vou want to keep
			***************************************	your job
			And the second	going to lose
				that, you are
				hooking, this and
				somebody doing
				screaming and
				you start
				known fact, if
				Ringling it is a
				night. With
				hook marks that
				some bloody
				showed you
				I could have
				come here.' And
				'Excuse me,
				would have said,
			•	night I believe I
				back there that
				If he had been
				man back there.
		-		never seen that
				(unintelligible) I
ler Clain	(6/3/04)		(6/13/00)	(3/25/00)
Including Complaints	Re	(7/20/00)	Statement	Statement
Other Contexts		USDA Affidavit	Congressional	PAWS
	To Piles Orland	Ey 69 Rider	Ex 68 Rider	Ex. 67. Rider

He yelled at me because I didn't	catch it in time.	with it. I didn't	were playing	Something they	above their head.	this room. Right	these lights in	down. Like	that and tore it	grabbed a hold of	because they	Kamara and Mia	wailed into both	there and just	Randy came in	things. And	little metal	tore down the	a wall and they	They were fixing	edging on a wall.	they tore some	pickup line and	far end of the	Kamara on the	was Mia and	Excuse me. It	a minute. No.	on the end wait	Mini and Nicole	remember that	New Jersey, I	"East Rutherford,		13/25/MI)	Stelement	Ex. 67, Rider
																																		Section 1	(MUSINA)	Congressional	Ex. 68, Rider
																												13							(100,00)	DSDA AIIIdayii	Ex. 69, Rider
													hook."	Kamala with a bull	elephants Minnie and	Peterson beat the	overhang. Randy	pulling down the	trunks to make them stop	smack them on their	to hit the elephants and	we were told instead just	have to move them, but	their trunks. I said we	up pulling it down with	elephants kept reaching	overhang and the	up under the brand new	elephants were chained	whole time. The	elephants were inside the	East Rutherford, NJ. The	"March 10- 15, 1998,	(0/3/04)	Responses, No. 11	Interrogatory	Ex 70, Rider Original
					Accordance of the Control of the Con													**************************************																About Abuse.	cluding	Other Contexts,	Various Statements in
																					0 · C1 man	Overhang com me	from pulling down the	down to prevent them	hefore they null anything	elephants are heaten	interrogatory answer the	punishment. In the 2004	30 minutes later" — as	the overhand some "70"	they have milled down	the elephants are hit after	In the PAWS statement			一年 日本の一年 日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日	Comments

		wouldn't see them chained up. It would look			
	,	public, when they came back to see the animals,			
	Interrogatory Responses, No. 15 (6/3/04).	straw and hay, so that the			
	Ex. 70, Rider Original	chains and make sure			
COLOR AMINANT.	chained up all the time."	had to go in and cover the			
USDA affidavit	about the animals being	animal open house. We			
PAWS statement and the	lot of complaining there	the first time we had an			
Both of these accounts	March 17-23, 1998,	"March 17-23,1998,			
					[Tr. 72-73.]
					New Jersey."
					East Rutherford,
					for. That was
					was getting hit
					no idea what he
					obviously, had
					elephant,
					happened so the
					after the incident
					20 or 30 minutes
					this was probably
					them. Of course,
					the bull hook to
					into him, took
					him, he wailed
					something to
					Saying
					that point.
					it was too late at
					once they did it,
					are so quick,
					catch it. They
	About Abuse.	The state of the s			
では、これの大きな	Did Complaints	16/7/04)	(1120)001	(6/13/00)	(3/25/00)
		Interrogatory	USDA Alfidavit	Congressional	Cretomon
Comments	Various Statements in	Ex. 70, Rider Original	Ex. 69, Rider	Ex. 68, Rider	Ex. 67, Rider
				NO. CALLEGE STATE CONTRACTOR STREET, SERVICE STATE STATE OF STATE	THE STANSON DANSONS REPORTED PROPERTY PARTY PARTY AND ADDRESS OF THE STANSONS AND ADDR

	S S			
affidavit.	constant chaining hitting			
statement and the USDA	were only there a couple			
from the PAWS	Springfield, MA. We			
This account was omitted	"May 5-6, 1998,			
	cleaned up."			
	when they were getting			
	were hooked and hit			
	off the train, hooked, they			
	elephants were brought			
	and got no exercise. The			
affidavit.	elephants were chained			
statement and the USDA	we were inside, and the			
from the PAWS	Providence, RI. Again			
This account was omitted	"April 29 - May 29, 1998,			
chaining).		l ony."		
claim of 24-hour per day		names were Neil and		
the case to validate the		abuse – two of their		
(which would have to be		uay occause of the allillian		
performed in chains	couldn't do anything."	people quit work in one		
the elephants ever	couldn't go outside,	out. At this location 4		
Rider has claimed that	elephants got no exercise,	Out At this location A		
incredible since not even	around up there. The	blook but it didn't med		
"fact" that is inherently	hooked, hit, smacked	une city, diey died office to		
"24 hours a day" – a	day. The elephants were	the city they tried cance to		
elephants were chained	chained up 24 hours a	place to awaraica tham in		
affidavit, that the	Madison Square Garden	weeks There was no		
omitted from the USDA	Madiana Samuel Out Of	ont no exercise for 3		
answer adds the detail	NV On the 5th floor of	New York - the elenhants		
The 2004 interrogatory	March 2/ April 13,	Madison Square Gardens		
	mt."	(C) 1/1 11000 :		
	elephants got hooked and			
	people were gone, the			
	Again as soon as the			
	better covered with hay.			
der Claims He Made About Abuse:	W. George	一一一一一一一一一一一	The last in the la	
Icludii	(0. L1	Constant	(UNITING)	(3/25/00)
Other Contexts, 3	Interrogatory	USDA Affidavit	Congressional	Statement
arious Statements in Comments	Ex. 70, Rider Original	Ex. 69, Rider	Ex. 68, Rider	Ex. 67, Kider
		ACRESAMENTAL DE L'ANNE DE		を見るとのである。 大きになる しょうしゅう 丁華

Statement (61300) Statement (61300) Compressional (1300) Repones, No.11 Including Complaint (1300) Repones, No.12 Including Complaint (1300) PAGE (1300) This account was omitted the whole time, châned, and there was lots of booking and hitting of the elephants were inside the whole time, châned, and there was lots of poking and hitting of the elephants. This account was omitted (1300) Hardroof, C.1. Again, loss of poking and hitting of the elephants set in the elephants got hit into (1300) Way 23-25, 1998, Was also getting smacked around. The big elephants were outside. We had to keep one side of the ent closed so the pack could not see the bradlers, the elephants. This account was omitted for the ent closed so the bradlers, the elephants were always. Always, NY. Again, loss of booking and hitting of the ent closed so the bradlers were always affidavit. This account was omitted from the PAWS (1300) Always, NY. Again, loss of booking and hitting of the paws of booking of the paws of th	statement and the USDA		elephants were hit and			
Congressional USDA Middavit Interrogatory (61300) (6130	from the PAWS		Syracuse, NY. Again the			
Congressional USDA Affidavit Responses. No. 11 Rider Contents in 16/30(4) Rider Co	This account was omitted		"June 2-3, 1998,			
Congressional USDA Affidavit Responses No 11 (613/00) Responses No 11 (613/00) Responses No 11 (613/00) Responses No 11 Relating Compaints (613/00) Responses No 11 Relating Compaints (613/00) Rober Claims He Made the clephants." "May 8-10, 1998, Worcester, MA. Again, the elephants were inside the whole time, chained, and there was lots of hooking and hitting." "May 15-17, 1998, Harford, CT. Again, lots of poking and hitting of the elephants Benjamin was getting hit all the time, and Shirley was also getting smacked around. The big relephants were outside. We had to keep one side We had to keep one side of the tent closed so the public in the park could not see the handlers were always walking out, making sure the government didn't			come around."			
Congresional USDA Affidavit Response, No. 1.1 Including Compaints (613/00) Response, No. 1.1 Including Compaints (613/00) Rider Claims He Made (15/04) Robut Abuse. hooking of the elephants. Were inside the whole time, chained, and there was lots of hooking and hitting." "May 8-10, 1998, Worcester, M.A. Again, the elephants were inside the whole time, chained, and there was lots of hooking and hitting." "May 15-17, 1998, Hartford, CT. Again, lots of poking and hitting of the elephants. Benjamin was getting hit all the time, and Shirley was also getting smaked around. The big elephants got hit loo." "May 21-25, 1998, Hershey, P.A. The elephants were ouside. We had to keep one side of the tent closed so the public in the park could not see the handlers hit the elephants." "May 28-3 1, 1998, Albany, NY. Again, lots of hooking and hitting. The handlers were always walking out, making sure			the government didn't			
Congressional USDA Affidavit Responses, No. 1.1 (61300) Responses, No. 1.1 (6204) Responses, No. 1.1 Rider Claims He Made Roboth Abuse. Roboth Abus			walking out, making sure			
Congressional USDA Affidavit Therrogatory Stricment (6/300) Responses, No. 11 Responses, No. 12 Responses, No. 12 Responses, No. 12 Responses, No. 12 Responses, No. 13 Responses, No. 12 Respo	affidavit.		The handlers were always			
Congressional USD Affidavit Statement (7/2000) Response, No. 11 (6/304) Response, No. 11 (6/304) Right Compaints (6/304) Right Calmy He Made About Abuse. hooking of the elephants." "May 8-10, 1998, Hartford, CT. Again, lots of poking and hitting of the elephants Benjamin was getting and hitting of the elephants Benjamin was getting hit all the time, and Shrley was also getting smacked around. The big elephants got hit too." "May 23-25, 1998, Hersbey, PA. The elephants were outside. We had to keep one side of the tent closed so the public in the park could not see the handlers hit the elephants, "May 8-3 1, 1998, Albany, NY. Again, lots Albany, NY. Again, lots	statement and the USD.		of hooking and hitting.			•
Congressional USD Affidavit (7/20/00) Response, No. 11 (6/13/00) Response, No. 11 Response, No. 11 Richard Compants (6/13/04) Richard Compants (6/13/04	from the PAWS		Albany, NY. Again, lots			
Congressional USDA Affidavit Responses, No. 11 (613/00) Rider Contexts. Responses, No. 11 (613/00) Rider Contexts. Rider Claims He Made clephants." "May 8-10, 1998, Worcester, MA. Again, the elephants were inside the whole time, chained, and there was lots of hooking and hitting." "May 15-17, 1998, Hartford, CT. Again, lots of poking and hitting of the elephants. Benjamin was getting hit all the time, and Shirley was also getting smacked around. The big elephants were outside. We had to keep one side of the tent closed so the public in the park could not see the handlers hit the elephants."	This account was omitte		"May 28-3 1, 1998,			-
Congressional USDA Mildavit Response, No. 11 (6/13/00) Rider Contexts. Response, No. 11 (6/13/00) Rider Contexts. Response, No. 11 (6/13/04) Rider Claims He Made About Abuse. hooking of the elephants. "May 8-10, 1998, Worcester, MA. Again, the elephants were inside the whole time, chained, and there was lots of hooking and hitting." "May 15-17, 1998, Hartford, CT. Again, lots of poking and hitting of the elephants. Benjamin was getting hir all the time, and Shirley was also getting smacked around. The big elephants were outside. We had to keep one side of the tent closed so the public in the park could not see the handlers hit			the elephants."			
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Congressional (TOUN) Statement (6/13/00)			public in the park could			
Congressional USDA Affidavit Kesponses, No. 11 (6/13/00) Kesponses, No. 11 (6/13/00) Cher Cornests, Kesponses, No. 11 (6/13/00) Cher Conglaints (6/13/00) Cher Conglaints (6/13/00) Cher Conglaints (6/13/00) Rider Claims He Made About Abuse, hooking of the elephants were inside the whole time, chained, and there was lots of hooking and hitting." "May 15-17, 1998, Hartford, CT. Again, lots of poking and hitting of the elephants Benjamin was getting hit all the time, and Shirley was also getting smacked around. The big elephants were outside. We had to keep one side			of the tent closed so the			
Statement (613/00) Statement (613/00) Statement (613/00) Cher Contexts, Response, No. 11 Including Complaints (63/04) Rider Claims He Made About Abuse. hooking of the elephants." "May 8-17, 1998, Hershey, PA. The elephants were outside.	affidavit.		We had to keep one side			
Statement (6/13/00) Statement (6/13/00) Compressional (6/13/00) Compression (6/13/00) Compress	statement and the USD		elephants were outside.			
Congressional USDA Affdavit Interrogatory Statement (72070) Statement (613700) Responses, No. 11 (Rider Claims He Made About Abuse. Abou	from the PAWS		Hershey, PA. The			
Congressional USDA Affidavit Responses, No. 11 (6/13/00) Statement (7/20/00) (6/13/00) Congressional (7/20/00) Responses, No. 11 (6/13/00) Responses, No. 11 (6/13/00) Responses, No. 11 (6/13/00) Responses, No. 11 (6/13/00) Responses, No. 12 (6/13/00) Reduct Complaints About Abuse. Abo	This account was omitte		"May 23-25, 1998,		•	
Congressional (7/20/00) Statement (6/3004) Responses, No. 11 (6/3004) Rider Claims He Made About Abuse. hooking of the elephants were inside the whole time, chained, and there was lots of hooking and hitting." "May 15-17, 1998, Hartford, CT. Again, lots of poking and hitting of the elephants. Benjamin was getting hit all the time, and Shirley was also getting smacked around. The big elephants got hit			too."			
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Congressional Statement (6/15/00) Congressional Congression Co			getting smacked around.			
Congressional VSDA Affidavit Response, No. 11 Response, No. 11 (o/13/00) Rider Contexts, Rider Organal Other Contexts, Rider Contexts, Including Complaints (o/13/00) Rider Claims He Made hooking of the elephants." "May 8-10, 1998, Worcester, MA. Again, the elephants were inside the whole time, chained, and there was lots of hooking and hitting." "May 15-17, 1998, Hartford, CT. Again, lots of poking and hitting of the elephants. Benjamin was getting hit all the			time, and Shirley was also			
Congressional USDA Affidavit Frequent (6/13/00) Responses No. 11 Responses No. 11 Responses No. 11 Responses No. 11 Reducting Complaints (6/13/00) Reducting Complaints (6/13/00) Reducting Complaints (6/13/00) Reducting Complaints (6/13/00) Reduct Claims He Made About Abuse About Abuse (7/20/00) (7/20/00) (8/13/00) (8/13/00) (9/13/00) (1) (1) (1) (1) (1) (1) (2) (1) (2) (1) (2) (3) (4) (4) (5/13/00) (5/13/00) (6/13/00)			was getting hit all the			
Congressional USDA Affidavit (720/00) (613/00) Responses, No. 11 (613/00) Responses, No. 11 (613/00) Rider Claims He Made About Abuse. hooking of the elephants." "May 8-10, 1998, Worcester, MA. Again, the elephants were inside the whole time, chained, and there was lots of hooking and hitting." "May 15-17, 1998, Hartford, CT. Again, lots of poking and hitting of	affidavit.		the elephants. Benjamin			
Congressional (7/20/00) (6/13/0	statement and the USD		of poking and hitting of			
Congressional (7/20/00) Statement (6/15/00) (6/15/00) (6/15/00) Congressional (7/20/00) Congressional (7/20/00) Congressional (7/20/00) Congressional (7/20/00) Congressional (7/20/00) Congressional Congressional (6/15/00) Congressional Congression About Abuse About Abuse Congression Cong	from the PAWS		Hartford, CT. Again, lots			
Congressional Statement (6/15/00) Responses, No. 11 (6/15/00) Responses, No. 11 Including Complaints (6/15/00) Rider Claims He Made hooking of the elephants." "May 8-10, 1998, Worcester, MA. Again, the elephants were inside the whole time, chained, and there was lots of hooking and hitting."	This account was omitt		"May 15-17, 1998,			
Congressional USDA Affidavit Statement (6/13/00) Responses, No. 11 (6/13/00) Responses, No. 11 (6/13/00) Rider Contexts Including Complaints (6/3/04) Rider Claims He Made About Abuse. **May 8-10, 1998, Worcester, MA. Again, the elephants were inside the whole time, chained, and there was lots of			hooking and hitting."			
Congressional USDA Affidavit Statement (6/13/00) Congressional (7/20/00) Congression (7/20/			and there was lots of			
Congressional USDA Affidavit Statement (6/13/00) Congressional Congression Congressio	affidavit.		the whole time, chained,			****
Congressional USDA Affidavit Statement (6/13/00) Congressional (7/20/00) Congressional (7/20/0	statement and the USD		the elephants were inside			
Congressional Statement (6/13/00) Congressional	from the PAWS		Worcester, MA. Again,			
Congressional Congressional USDA Affidavit Statement (6/13/00) Congressional (6/13/00) Congressional	This account was omitt		"May 8-10, 1998,	and the second		
Congressional USDA Affidavit Interrogatory Other Contexts, Statement (7/20/00) Responses, No. 11 Including Complaints (6/13/00) Rider Claims He Made About Abuse.			elephants."			
Congressional USDA Affidavit Interrogatory Other Contexts, Statement (7/20/00) Responses, No. 11 (6/3/00) Rider Claims He Made About Abuse.			hooking of the			
Congressional USDA Affidavit Interrogatory Other Contexts, Statement (7/20/00) Responses, No. 11 Including Complaints	Lane	A	Tr. (40)cmb	一 の 一 の 一 の 一 の 一 の 一 の 一 の 一 の 一 の 一 の	The Contract of the Contract o	The state of the s
Congressional USDA Affidavit Interrogatory Other Contexts, Statement (770000) Paragress No. 11 Congressional USDA Officer O	inis in the second seco		FT OF Personalesia	and of more of the second	(6/13/00) +	(3/25/00)
LA. 05, Kider L. D., Kider Urginal Yarious Statements in		Other Contexts	Responses No. 11	1/20/00)	Statement	Statement
		Yarious Statement	Ex. 70, Ruger Original	FA 07, Nuter	EA. 00, NOEL	PAWS

the USDA affidavit			elephants in [sic] close to	Manufacture of the Control of the Co	opcii. Ailu i was
statement. In addition,			car that transports the		every willdow
included in the PAWS			heat was unbearable. The		every door open,
"fire hazard" which is not			elephants in the train, the		be 125. I had
straw" and creating a			day. I was riding with the		outside. It had to
heing "clogged with			were traveling during the		It was about 112
calling lights and wants			over 100 degrees and we		was 125 degrees.
the detail shout the			to Phoenix, AZ - it was		to Phoenix, it
The USDA affidavit adds			"11.) July 1998, in route		"Yuma, Arizona
		commands."			
		gave them the			
		they hit them and then			
		commands. Sometimes			
	No. 15 (6/3/04).	hitting, giving them			
	Interrogatory Responses,	same thing, hooking and			
	Ex. 70, Rider Original	out there and doing the			
	and hitting the elephants."	Randy Peterson coming			
	Rodriguez was hooking	elephant, I remember			
USDA affidavit.	Peterson that Tony	Rodriquez smacking an			
PAWS statement and the	complained to Randy	remember Tony			
were omitted from the	Lubbock, TX. I	Lubbock, TX. I			
Both of these accounts	"June 18-21, 1998,	"June 18-2 1,1998,			
		hooking and hitting."			
		them up at night, constant			
		from the train, cleaning			
		the walk going to and			
affidavit.		hitting of the elephants on			
statement and the USDA		there was hooking and			
from the PAWS		Washington, KY. Again,			
This account was omitted		"June 11-14, 1998,			
affidavit.		hit and hooked."			
statement and the IISDA		thing, the elephants were			
from the PAWS		Rochester, NY. Same			
This account was omitted		"June 5-7, 1998,			
affidavit.		hooked."			
一年の一日 日本	About Abuse.	The state of the s	一 一 一 一 一 一 一 一 一 一 一 一 一 一 一 一 一 一 一	The state of the s	
	Rider Claims He Made	(6/3/04)		(6/13/00)	(3/25/00)
	Including Complaints	Responses, No. 11	(7/20/00)	Statement	Statement
Comments	Other Contexts	interrogatory	USDA Affidavit	Congressional	PAWS
		The Part of the Pa	Fx 69 Rider	Ex. 68. Rider	Ex. 67. Rider

time. I poured like 215 cases and I told them, I said, 'Somebody stole our water.' But I had about 15 cases of bottled water and	sitting there, could hardly breathe. All the water was hot. I couldn't water the animals. I remember that. Because all I was getting was real hot water coming out was too hot for the girls to drink. So what I did I think you know this now I went and took a whole bunch of the bottled water that I knew wasn't that hot, and dumped them in there. All the girls were getting just a little sip at the	Ex. 67, Rider PAWS Statement (3/25/00)
		Ex. 68, Rider Congressional Statement (6/13/00)
	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."	Ex. 69, Rider USDA Affidavit (7/20/00)
		Ex. 70, Rider Original Interrogatory Responses, No. 11 (6/3/04)
		Various Statements in Other Contexts, Including Complaints Rider Claims He Made About Abuse
	emphasizes heat in the elephant car and that Rider "had no way to cool the elephants down, even the water was hot," thereby clearly implying that the elephants did not have enough water. However, the USDA affidavit omits the fact included in the PAWS statement Rider in fact gave the elephants water.	Comments

statement and the USDA		Girming on m and parting			
irom the PAWS		Were out in the narking			
This account was omitted		"Aug. 6-9, 1998, Englewood CA Wa			
		on and off the train."			
		hooking of the elephants			
:		was lots of hitting and			
affidavit.		degrees. Very hot. There			
statement and the USDA		Fresno. It was a 100	Manage Services		
from the PAWS		CA. We were outside in			
This account was omitted		"July 8 -12,1998, Fresno,			
		hooked."			
affidavit.		inside, they were hit and			
statement and the IISDA		elephants were down			
This account was omitted from the PAWS		"July 1-15, 1998, Phoenix, AZ. The			
					pp. 92-93]
					Phoenix." [Tr.
					I dilla to
					Virma to
					was not in the
					was so not. It
					mas so hot It
					have in the toul
					water that we
					drinking it. The
					instead of me
					water to the girls
					that. I give the
					drink. I know
******					anything to
					didn't have
					day that I
					was so hot that
					girls a drink. It
					car, giving the
The state of the s	Samuel Indian				ran it through the
<u>• </u>	About Abuse	(40/0/04)	· · · · · · · · · · · · · · · · · · ·	Jorgan John State	(10000)
	Including Complaints	Responses, No. 11	(7/20/00)	outement	(3/75/00) *
	Other Contexts,	Interrogatory	USDA Affidavit	Congressional	PAWS
Comments	Various Statements in	Ex. 70, Rider Original	Ex. 69, Rider	Ex. 68, Kider	EX. 6/, Kuder
				- 新社会は大学の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の	CHARLES AND ADDRESS OF THE PARTY OF THE PART

was "slammed" in the					
an instance in which he			hit me in the eye with her	circus had been killed	
with the elephant's tail as			this I echame accidentally	the ton trainers for the	
Rider relates the incident			her housels) While doing	ont too close. One of	
dangerous elephants,		bull nook.	trolly har out (to alone)	could bill you if you	
legislation to control		elephant Lechme with a	Constinution We had to	elenhants and how they	
when the subject is		Kandy Peterson hit the	having necklome was	time about dangerous	
congressional statement,		CA. Pat Harned and	Anaheim, CA – the	hand stories all the	
In the June 2000		"August, 1998, Anaheim,	"12.) August 1998, in	"While I worked for	
		train, off the train."			
affidavit.		Of the elephants on the			
statement and the USDA		lot of hooking and hitting			
from the PAWS		Diego, CA. There was a			
This account was omitted		"Aug. 12-16, 1998, San			
		make them go faster."			
		hit them behind the leg to			
		would always hook them,			
		in every single town, they			
		them up before the show,			
		night when they'd warm			
		warmed them up, every			
		hooked while the handlers			
		and they were being			
		had to walk into the arena			
-		elephants because they			
		was too rough on the			
		not in there very much. It			
		area, although they were			
		had a little recreation			
		in the parking lot. We			
		They kept the elephants			
		elephants on the walk.			
		hooking and hitting of the			
affidavit.		lot. Again there was			
ie Made	About Abuse.	(0)2104)	を 一	Control of the last	Sand Comment of the Party of th
uplaints		Kesponses, No. 11	C/20002	THE MENT OF THE PROPERTY OF TH	13/75/00
exts,	100	Interrogatory	USDA Allidavit	Statement	Statement
ments in Comments	Various Statements	Ex /0, Kider Original	La. oy, Kuder	EA 00, Much	DAWS.
		は一個では、一個などのでは、「一個などのでは、「「」というない。	Manager 1997年 19		EV 67 DIAGE

"Karen, I don't		Ex. 67, Rider PAWS Statement (3/25/00)
"We had an elephant	by one of his elephants and a lot of handlers were hit when they were working around them. I was injured in the eye when an elephant slammed me with her tail and I have been slammed a few times while working around them."	Ex. 68, Rider Congressional Statement (6/13/00)
	tail. Pat Harned and Randy Peterson hit Lechame because she flicked her tail at me. It was just an accident, the elephant did not intentionally hit me, she did not deserve to get hit for this."	Ex. 69, Rider USDA Affidavit (7/20/00)
		Ex. 70, Rider Original Interrogatory Responses, No. 11 (6/3/04)
"They're very, as far as,		Various Statements in Other Contexts, Including Complaints Rider Claims He Made
In the June 2000	eye, thereby emphasizing how "dangerous" working around the elephants can be. In the USDA affidavit, written just a month later, the theme is "abused elephants" and here the same incident is portrayed as Rider being "accidentally" hit with the elephant's tail and the elephant being "hit" unjustifiably for it by her handlers. The June 2000 congressional statement omitted the part about the "accident," and the "slamming," thereby conforming the respective accounts to the contexts in which the statement was being made. By 2004, when the interrogatory answer is served, the account leaves out the tail altogether and therefore simply reports what is portrayed as Hill hitting the elephant for no reason at all.	Comments

known to Rider. Rider	[inaudible]. He goes,				reet away, she
based upon facts that are	[inaudible] has an abscess				walking by 20
public exhibitions is false.	the vet comes in. I said,				would be
should not be involved in	abscessed. The next day			-	me ume. II I
dangerous animal that	Her back tooth was				swing at me all
portrayal of Karen as a	I had to open her mouth.				mem. She would
Furthermore, the	know what an abscess is.				out and smack
•	lost some of my teeth. I				she would reach
are totally inconsistent.	what was wrong. I've				they get too close
accounts of this animal	on her cheek, and I saw				occasions. When
her toothache. The two	finger on her trunk, put it				several
spoke with concerning	eating. She took a little			audience"	hit guys on
actually hugged and	wrong? You're not			have contact with the	me. I've seen her
sensitive creature that he	said, Karen, what's			they allowed her to	aggressive with
elephant Karen as a	up to that elephant and I			into the ground, yet	never got
portrays the same	arms around her. I went			range, slamming them	like me. But she
handling practices Bider	went up to her. I put my			anyone who came into	Karen just didn't
due to allegedly abusive	happened to her again. I			a bad habit of knocking	years because
han elenhants in circuses	[inaudible] the same thing			around her. Karen had	two and-a-half
subject was legislation to	Thirty days later in			net or other protection	touched Karen in
hearing in 2005 when the	healthier shall we say.			elephant with no safety	physically
In the Connecticut	drugs. She became a lot			stand around the	I've never
interact with customers	did the normal [inaudible]			public is allowed to	touched them.
with the show and	about three vets. They			adventure where the	them, pat them or
allowed to be on the read	sickness. They called			the three-ring	I have the rest of
irresponsibly been	developed some kind of			only one they used in	put my hand like
elephant that has	[inaudible]. She			the group, she is the	never physically
purportedly "killer"	elephant over in			dangerous elephant in	Brothers, have
nortraved as a	of Karen, this was an			was the most	Ringling
the elephant Karan	show you just the feelings			elephant. Although she	half years with
"dangerous" alenkante	tninke [[ntil inst to			was a good performing	my two and-a-
logislation to control	and go to sleen in their			performing because she	anybody but I, in
when the subject was	[sic] could curl un even			was kept on the road	ever killed
congressional committee	be as gentle as, you'd		· · ·	labeled 'killer' yet she	that Karen has
statement to the	they're gentle. They can			named Karen who was	know for a fact
	About Abuse	Canterior			
	Including Complaints	Kesponses, No. 11	(1/20/00)	(6/13/00)	(3/25/00)
	Other Contexts,	Interrogatory	TIAMINIA AUGU	Statement	Statement
Comments	Various Statements in	Ex. 70, Muer Original	I Sin A Mid-	Congressional	PAWS
POTENTIAL PROPERTY AND ADDRESS OF THE POTENTIAL PROPERTY ADDRESS OF		ラー とうこう 一人	The state of the s	Dy 68 Dider	De AT Diller

But I have walked past her	up, she would have killed me.	purposely walked	enough if I had	me but I know, if	aggressive with	never ever got	1 wasn't she	me. She was a	be playing with	the back just to	slapped me on	now,' and turned	'Can't get me	Karen and said,	over I looked at	Two elephants	had to clean.	pulling back so I	and started	the nicket line	and grabbed the	reached way out	pulling I	occasion, I was	remember on one	swing just to be	would still take a	Ex. 67, Rider PAWS Statement (3/25/00)
																												Ex. 68, Rider Congressional Statement (6/13/00)
																												Ex. 69, Rider USDA Affidavit (7/20/00)
					lecture																							Ex. 70, Rider Original Interrogatory Responses, No. 11 (6/3/04)
																		(3/4/03)	Legislature at 190-91	to Connecticut	Ex. 71, Rider Statement	elephants have feelings."	an abscess. Yes,	nulled the tooth. It was	and went like that Up	said, Karen, where do you	how do you know? I	Various Statements in Other Contexts, Including Complaints Rider Claims He Made About Abuse.
reporter, not FEI. "Kamala" sounds nothing like "Karen" and it is	independent third party	was prepared by an	elephant, "Kamala."	referred to another	because he actually	Karen was a "misnrint"	reference in the	Rider now claims that the	Propromi omicinelli	congressional statement	from both the PAWS	qualifier was omitted	This highly material	Dep. at 275-76 (10/12/06)	hy Rider Fy 73 Dider	nublicly accribed to ber	the "threat" that has been	handler whom Karen	accompanied by a	strangers are	trunk. However when	strangers by swinging her	may respond to such	is wary of strangers	Karen is an elephant who	2006 deposition that	admitted in his October	Comments

	and forget what I am doing, she will reach over and nudge me like, hey, come on, don't get here." [Tr. pp. 102-03.]	Ex. 67, Rider PAWS Statement (3/25/00)
		Ex. 68, Rider Congressional Statement (6/13/00)
"13.) August, 1998, in San Jose, CA - the Humane Society investigated an elephant bleeding behind the ear. They documented the bloody elephant, but they		Ex. 69, Rider USDA Affidavit (7/20/00)
"Aug. 25-30, 1998, San Jose, CA. All the hitting took place inside the tent with the walls down, so the public wouldn't see it. Elephants were struck with bull hooks behind		Ex. 70, Rider Original Interrogatory Responses, No. 11 (6/3/04)
		Various Statements in Other Contexts, Including Complaints Rider Claims He Made
The 2004 interrogatory answer makes no mention of the fact that a purported incident of elephant abuse was investigated by a local humane society but was	more than a coincidence that, of the 53 elephants that FEI owns, the reporter mistakenly heard Rider refer to the one elephant that Rider has publicly portrayed as "dangerous." In 2000, Rider told PAWS that "I don't know for a fact that Karen has ever killed anybody." However, Rider stated in his deposition in 2006 that she was "responsible for the death of two people" based a statement that he heard from Randy Peterson, a person with whom Rider worked in 1997-98. So six years after the fact, Rider chose to disclose this information in his deposition, having never said anything about it in the prior statements.	Comments

		Ex. 67, Kider PAWS Statement (3/25/00)
		Ex. 68, Rider Congressional Statement (6/13/00)
	said they could not prosecute because they could not determine who had beat 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."	Ex. 69, Rider- USDA Affidavit (7/20/00)
"Sept. 9-13,1998, Sacramento, CA. Sacramento they had a 3.5. mile walk in. The elephants came off the rain and were hooked all the way for 3.5 miles, the handlers were always	"Sept. 2-7, 1998, San Francisco, CA. Adam Hill and Robby Costillo were checking for blood behind the elephants from hook wounds because they knew there were cameras around. I was standing right there and Adam pointed to blood behind the ear of an elephants and he went to raise the trunk and smacked the elephants on the trunk, while Robby stabbed the elephants under the chin to make them raise their trunks up."	Ex. 70, Rider Original Interrogatory Responses, No. 11 (63704)
		Various Statements in Other Contexts, Including Complaints Rider Claims He Made About Abuse
This account was omitted from the PAWS statement and the USDA affidavit.	In the 2000 USDA affidavit the problem described was the excessive heat. In the 2004 interrogatory answer it was blood behind the elephants' ears, with no mention of the heat.	Comments

irom the PAWS		Sail Lake City, OI. Iney			
This account was omitted		"Sept. 30 - Oct. 4, 1998,			
alluavit.		before the show."			
statement and the USDA		train, and during warm up			
from the PAWS		and hitting offen on the			
This account was omitted		"Sept. 25-27, 1998,			
		show."			
		warm up before the			
		went into the show to			
		Hooking them when they			
		way up to the ring.			
affidavit.		the train, hooking all the			
statement and the USDA		hooking and hitting on			
from the PAWS		Spokane, WA. Again,			
This account was omitted		"Sept. 22-23, 1998,		*****	
		and hitting."			
		Again, lots of hooking			
		over 20 hours a day.			
		were always chained up			
		there was rehearsal. They			
		arena to perform, or if			
		were ever taken into the			
		24/7 except when they			
		been chained pretty well			
		So far the elephants have			
		for long periods of time.			
		exercise at all, chained up			
		room to move around, no			
		under the space heater, no			
affidavit.	Address of the	little bitty barn, right			
statement and the USDA		The elephants were in a			
from the PAWS		Seattle, WA. It was cold.			
This account was amitted		"Sept. 17-20, 1998,			
		hooking them."			
· · · · · · · · · · · · · · · · · · ·	About Abuse	(6:3/04)		(oracino)	(Anierie)
	Including Complaints	Kesponses, No. 11	(7/20/00)	oratement.	CA/DE/ON
	Other Contexts,	Interrogatory	USDA Affidavit	Congressional	PAWS
Comments	Various Statements in	Ex. 70, Rider Original	Ex. 69, Rider	Ex. 68, Rider	Ex 67, Kider
			AND THE RESIDENCE OF THE PROPERTY OF THE PROPE	のでは、これでは、10mmのでは、10m	はのないとうないになるとのであるとののようにいてはないの

nortray an abusiyaly cold					stock cars, and of
the latter two statements					mio, mside de
answer. The result is that					Silve old the
2004 interrogatory					snow blowing
USDA affidavit and the					me doors, mere
is omitted from the					the dear them
the railcar. This fact also					III. Off the stock
the cold temperature in					in On the stock
obviously contributed to					open, me snow
the train stopped) which					onen the crow
corner for disposal when		elephants."			oecause me
have been pushed into a		was too cold for the			because the
admitted that it could		the snow out because it			hatimatha time
manure (when he also		between the doors to keep			the rectification
doors to dispose of		decided to shove hay in			Was not only on
Rider opened the railcar		were no heaters, and I			Ohio The chow
statement also states that		the train because there			Tellienhoer mar
answer. The PAWS		Cleveland, it was cold on	neater).		winter. I
the 2004 interrogatory		repeatedly. After we left	oaoy animai car nas a		winter I
the USDA affidavit and		show, on their way in,	behavioral comy me		to Boston It was
fact is omitted from both		hooking them before the	elephant for (only the		We were heading
winter conditions. That		the elephants to the arena,	there is no heat in the		from Cleveland
neat for the animals in		the about the train, gening	the cold from coming in:		if we were going
is a sufficient source of		and off the train cetting	of the door to try to ston		to I don't know
icacini die l'antonu cars		hooking and hitting on	packed hav in the cracks		from Cleveland
heat in the reilroad care		Again, there was lots of	could see my breath. I		We were going
told that elephant hody		inside, and it was cold.	cold on the train that I		about the stocks.
PAWS admits that he was		Cleveland, OH. We were	Cleveland, OH – it was so		want to bring up
Rider's statement to		"Oct. 23 - Nov, 1, 1998,	"16.) November 1998,		"One incident I
affidavit.		of the elephants."			
statement and the USDA		lot of hooking and hitting			
from the PAWS		Chicago, IL. There was a			
This account was omitted		"Nov. 17-29, 1998,			
ainua vit.		hit them."			
statement and the USDA		hooked the elephants and			
	About Abuse.	had a manda and the		All the state of t	CONTRACTOR OF STREET
	Rider Claims He Made	(6/3/04)		(00/61/0)	(00/67/6)
	Including Complaints	Responses, No. 11	(7/20/00)	Statement	Statement
Commence of the second	Other Contexts,	· Interrogatory	USDA Affidavit	Congressional	PAWS
Commonia	Various Statements in	Ex. 70, Rider Original	Ex. 69, Rider	Ex. 68, Rider	Ex 67, Rider

when we are traveling in the colder part of the year, the beginning of	course there is no heaters in there, I was taking bales of hay and breaking up flakes and shoving in the door to keep the snow from coming inside. It was the coldest I've ever seen it on those stocks. I don't know what their excuse is for not having heaters in there. What they tell us is that, well, body heat will keep it warm in there. I've seen - my travels on the stocks because I'm there from when it gets dark until 10:30 at night I've seen	Ex. 67, Rider PAWS Statement (3/25/00)
		Ex. 68, Rider Congressional Statement (6/13/00)
		Ex. 69, Rider USDA Affidavit (7/20/00)
		Ex. 70, Rider Origina Interrogatory Responses, No., 11 (6/3/04)
		U Various Statements in Other Contexts, Including Complaints Rider Claims He Made About Abuse.
	environment in the railcar that would be seen in a different light had these two material facts been disclosed.	Comments

one particular	remember that	them. I	back side of	in the door on the	air was coming	this car. And the	three English in	have English, the	Rebecca. You	blowing on	had wind	you constantly	elephants. So	stock cars with	only have two	cars. Because I	between the two	all the time,	between are open	The doors in	gapped for air.	your doors are	comes in, plus	gap where the air	you still have a	they only slide so	Plexiglas, and	basically plastic,	windows are	stocks. The	cold inside the	gets extremely	wintertime, it	tours, and the		(3/25/00)	Statement	PAWS	
																																			が 一般の	(6/13/00)	Statement	Congressional	STATE OF THE PARTY
							***					**************************************															***************************************	· · · · · · · · · · · · · · · · · · ·							の問題を経済を持ちる		(7/20/00)	USDA Affidavit	は他に対象がよります。これは対象の
																								e de la como												(6/3/04)	Responses No. 11	Interrogatory	
																																				100	Including Complaints	- Various Statements in	
																																	,,,		の 日本 日本の日本の知時の			Comments	

have a choice. I	cold. I didn't	make the girls	was going to	though I knew it	the doors even	it. I would open	were picking in	And then they	or something.	a pile by the door	would push it in	there. Or they	the girls stand	would just leave	stuff. They	push out the	open the doors to	the guys wouldn't	doors but most of	would open the	with stock cars, I	problem we have	wintertime, the	thing is, in the	doors. The other	I didn't open the	outside, because	snowstorm	(unintelligible) a	was	in the door. It	mean, piling up	blowing in. I	case it was snow	1000年の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の	(3/25/00)	Statement	PAWS	Ex. 67, Rider
																																			· · · · · · · · · · · · · · · · · · ·	(6/13/00)	Statement	Congressional	Ex. 68. Rider
																																			一 一 一 一 一 一 一 一 一 一 一 一 一 一 一 一 一 一 一		(7/20/00)	USDA Affidavit	Ex 69 Rider
	••																																			(6/3/04)	Responses, No. 11	Interrogatory	Ex 70 Rider Origina
			•																																LATE OF	Rider Claims He Made	Including Complaints	Other Contests II	
																					***************************************														一丁以 一丁 南北 海		1000年の日本の大学の大学の大学の大学の大学の大学の大学の大学の大学の大学の大学の大学の大学の	Comments And	神経・大道を推決しては、中国は、非常には、自然には、自然には、これでは、

che supposed "killer" elephant.	the elephant Nicole. It happened another time in			about something and he would
	got mad at her and come			would be arguing
	the times he did this, he			lose his temper.
	wife, this is just one of			Randy would just
	Peterson got mad at his			it would be like
	Rosemont, IL. Randy			instances where
	"Nov. 4-15, 1998,			"I've seen several
				[Tr. pp. 88-91]
				I've seen of it".
				but that's the last
				quarters with me
				went to winter
				It was still it
				believe is gone.
				for two years I
				car that we used
				out. The stock
				could to push it
				wait as long as I
				by the door and
				try to push it up
				door. So I would
				I have open the
				down every time
				the car back
				temperature in
				brought the
				automatically
				and that
				to shove it out,
				own waste. I got
				standing in their
				didn't want them
Other Contexts, Including Complaints Rider Claims He Made About Above	Responses, No. 11 (63/04)	(7/20/00)	Statement (6/13/00)	Statement (3/25/00)
Various Statements	Ex. 70, Rider Original	Ex. 69, Rider	Ex 68, Rider	Ex. 67, Rider
			Company of the Party of the Par	A SAME AND DESCRIPTION OF PERSONS ASSESSED.

					whole life had
					individual who,
					was a very rough
					through it. He
					of them lived
					surprised some
					Pat, I am
					Between him and
					miniature Pat.
					he was a
			•		else. Basically,
					and wherever
					head, the trunk
					the top of the
			- Vi - 11		back and forth on
					just bam, bam
					both hands, and
					on the hook but
					not just one hand
					into Karen with
					seen him wail
					head. I have
					them about the
					severely beat
					seen him
					the head. I have
		as one on the same of			would get hit on
		it out on the elenhants."			the chain, it
		about something and take			elephant rattled
		come in they'd be mad	***************************************		somebody, if an
		these guys that would			was mad at
		mad at his wife. A lot of			come in, if he
		Nicole because he was			elephants. If he
		Winter Quarters, he beat			take it out on the
ıde	Rider Claims He Made About Abuse.	(6/3/04)		(0/15/00)	(naicz(c)
its Comments	ıclud	Responses, No. 11	(7/20/00)	Statement	Statement
	Other Contexts,	Interrogatory -	USDA Affidavit	Congressional	PAWS
in Comments	Various Statements	Ex. 70, Rider Original	EX 09, Kider	EX. 08, Kider	金の一個の一個の一個の一個の一個の一個の一個の一個の一個の一個の一個の一個の一個の

			elephants." [Tr. pp. 60-61.]	Ex. 67, Rider PAWS Statement (3/25/00) been with
				Ex. 68, Rider Congressional Statement (6/13/00)
				Ex. 69, Rider USDA Affidavit (7/20/00)
They did get to go outside a little bit in pens, but usually they were brought back in quickly. When I got to work at about 3:30, they were in the pens, until about 5:00, and then they were back in, chained up the rest of the time. They may have got 15 hours chained and maybe 9 hours out of the chain during this time. But this is the only time when they are not on the road performing."	"Winter Quarters, 1998, Tampa, FL. It was very rough on the elephants.	"Dec. 3-6, 1998, Huntsville, AL. There was lots of hooking and hitting of the elephants coming off the train, hooking and hitting all around. Very bad. Adam Hill hit Karen and Sophie with a bull hook."	"Nov. 17-29, 1998, Chicago, II. There was a lot of hooking and hitting of the elephants."	Ex. 70, Rider Original Interrogatory Responses, No. 11 (6/3/04)
				Various Statements in Other Contexts, Including Complaints Rider Claims He Made About Abuse.
affidavit.	This account was omitted from the PAWS statement and the USDA	This account was omitted from the PAWS statement and the USDA affidavit.	This account was omitted from the PAWS statement and the USDA	Comments

		Ex. 67, Rider PAWS Statement (3/25/00)
		Ex. 68, Rider Congressional Statement (6/13/00)
"18.) January 1999, Jacksonville, FL – Alex Vargas came to visit the circus (he has a trapeze act, and use [sic] 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 employed by Ringling, but no longer with the Blue Unit)."		Ex. 69, Rider USDA Affidavit (7/20/00)
"Jan 14-18, 1999, Jacksonville, FL. Again the elephants were getting hit."	"Jan. 7-10, 1999, Sunrise, FL. They started putting up fences because the animal rights groups were complaining about the elephants being chained all the time. So we might put two or three of the elephants outside, for the public to see, but the rest of them would stay inside chained up. Very rarely would the elephants all get outside together. Again, there was daily hooking and hitting of the elephants."	Ex. 70, Rider Original Interrogatory Responses, No. 11 (6/3/04)
"Jan. 14-18, 1999, Jacksonville, FL. I went to Alex Vargas and asked him to do something about these guys beating the elephants all the time. He said there was nothing he could do, that this is 'discipline,' and the handlers were going to do it anyway." Ex. 70, Rider Original Interrogatory Responses, No. 15 (6/3/04).		Various Statements in Other Contexts, Including Complaints Rider Claims He Made About Abuse
The description of Alex Vargas evolves over time. In the 2000 USDA affidavit, Rider portrayed Vargas as a person to whom Rider complained about elephant abuse but could not do anything about it because Vargas feared he would be fired, thereby implying that Vargas agreed with Rider's views. By 2004 when Rider answers interrogatories in this case, Vargas is portrayed as defending the practices that Rider was	This account was omitted from the PAWS statement and the USDA affidavit. Furthermore, this statement acknowledges the use of the electric fence to contain elephants while on the road which is inconsistent with Rider's statements elsewhere that the elephants are always chained unless they are performing or rehearsing.	Comments

Mount expect to Have seen					
would expect to have seen		there "			
the local IISDA office one		USDA has an office			
shout the proximity of		heads first, because the			
to employee concern		always looking over their			
makes specific reference		were very cautious and			
affidavit. Since this		hitting, but the handlers			
statement and the USDA		a lot of hooking and			
from the PAWS		Raleigh, NC. There was			
This account was omitted		"Feb. 10-14, 1999,			
affidavit.					
statement and the USDA		hooking and hitting."			
from the PAWS		Columbia, SC. More			
This account was omitted		"Feb. 5-7, 1999,			
affidavit.					
statement and the USDA		hooking and hitting."			
from the PAWS		GA. Again, lots of			
This account was omitted		"Feb. 2-3, 1999, Augusta,			
		got hooked and hit."			
		do something right, they			
		getting hit. If they didn't			
affidavit.		these elephants were			
statement and the USDA		every day of the week			
from the PAWS		Macomb, GA. Each and			
This account was omitted		"Jan. 28-31, 1999,			
affidavit.		going on all the time."			
statement and the USDA		lot of hooking and hitting			
from the PAWS		Charleston, SC. Again, a			
This account was omitted		"Jan. 21-24, 1999, North			
employment.					
termination of					
allegedly fearing			,		
answer about Vargas					
2004 interrogatory					
mention was made in the					
complaining about. No					
一日のからないないのでは 東京の	About Abuse.	中 東西 リタカナンを	· · · · · · · · · · · · · · · · · · ·	一 一 一 一 一 一 一 一 一 一 一 一 一 一 一 一 一 一 一	
		(6/3/04)		(6/13/00)	(3/25/00)
	Including Complaints	Responses, No. 11	(7/20/00)	Statement	Statement
Comments		Interrogatory	USDA Affidavit	Congressional	PAWS
11日の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本	Vorinie Crarements in	Ty 70 Rider Original	Fr 69 Ridge	Ex 68 Rider	Ex 67 Rider

that he had a bond with					sard; im gomg
under cuts and assertion					anid (I'm anina
undersort his essential					do about it?
witnessed but did not					are you going to
USDA about what he					train, said, 'What
have made a complaint to					electrician on the
that Rider could very well					Carl, the
fact that acknowledging					the baby and
omission stems from the					Pat beating on
inferred that this					train car about
could be reasonably		Benjamin."			yelling in the
interrogatory answer. It		Pat Harned beat			when I was
omitted from the 2004		hitting inside the arena.			after the MCI
elephant abuse was		constant hooking and			- that was just
complaints about		elephants inside, it was			mad because of -
USDA with his		soon as we got the			and I was real
threatening to go to the		Washington, D.C. As			night in the car
The part about Rider		"March 24-28, 1999,			"I come up one
		repeatedly."			
		elephants were hit			
affidavit.		small arena and the			
statement and the USDA		kind of a rough time in			
from the PAWS		Baltimore, MD. That was			
This account was omitted		"March 10-21 1999,			
		and during the walk."			
		getting them off the train			
		hooking and elephants			
		and hitting; a lot of			
		there was a lot of hooking			
		the building, and, again,			
affidavit.		the train to get them to			
statement and the USDA		walk the elephants from			
from the PAWS		Charlotte, NC. We had to			
This account was omitted		"Feb. 17-21, 1999,			
affidavit.					
this in the HED.					
	Rider Claims He Made About Abuse.	(6/3/04)		(6/13/00)	(3/25/00)
を持ちている。		Responses, No. 11	(7/20/00)	Statement	Statement
Comments	Other Contexts	Interrogatory	USDA Affidavit	Congressional	PAWS
	Various States and its	Ex 70 Ridge Original	Ex 60 Bider	Ex 68 Rider	Ex 67 Rider

		hooking when the			
affidavit.		basis in its the train,			
statement and the USDA		was hooking getting the			
from the PAWS		Charleston, WV. There			
This account was amitted		"April 22-25, 1999,			
willed alt.		elephants."			
offidavit		and hooking of the			
statement and the Henry		there was a lot of hitting			
This account was omitted		Landover MD Again			
Armory.		"An-: 116 18 1000			
events at the D.C.					
answer he relates several		can be."			
later, in the interrogatory		stainless steel, sharp as			
D.C. Armory. Four years		bull hook, made of			
about the events at the		were told was to get a			
remember "anything"		Rico. The first thing they			
question, Rider could not		employees from Puerto			83.
was closer to the events in		where we got five new			armory. [11. p.
March 2000 at a time that		Armory. The Armory is			anything at the
statement to PAWS in		Washington, DC at the			remember
When he gave the		"March 30-31, 1999,			"I don't
a de de la composición dela composición de la composición de la composición dela composición dela composición dela composición de la composición dela composición de la composición dela					[Tr. 83-87]
					USDA on us.""
					going to go to the
					hear you are
					of them were, 'I
					Randy, all three
					Pettigrew and
u camient.					Pat and Jeff
mjury as a result of their					day, of course,
iniury" as a result of their					The very next
suffered on "anothetic					22 USDA.
these clanhants and	A STATE OF THE PARTY OF THE PAR				to go to the
	About Abuse	(40/0m)			
	.000 ~ C	Kesponses, No. 11	(1120/00)	(6/13/00)	(3/25/00)
	\$150 E-1	Interrogatory	USDA Affidavit	Congressional	PAWS
Comments	Various Statements in	Ex. 70, Rider Original	Ex. 69, Rider	Ex. 68, Rider	Ex. 67, Rider

This account was omitted from the PAWS statement and the USDA affidavit. This account was omitted from the PAWS statement and the USDA affidavit. This account was omitted from the PAWS statement and the USDA affidavit.		hitting of the elephants on the train, hitting them			
This account was omit from the PAWS statement and the USI affidavit. This account was omit from the PAWS statement and the USI affidavit. This account was omit from the PAWS statement and the USI affidavit.		hitting of the elephants			
This account was omit from the PAWS statement and the USI affidavit. This account was omit from the PAWS statement and the USI affidavit. This account was omit from the PAWS statement and the USI affidavit.					
This account was omit from the PAWS statement and the USI affidavit. This account was omit from the PAWS statement and the USI affidavit. This account was omit from the PAWS		there was hooking and			
This account was omit from the PAWS statement and the USI affidavit. This account was omit from the PAWS statement and the USI affidavit. This account was omit affidavit.		Columbus, OH. Again			
This account was omit from the PAWS statement and the USI affidavit. This account was omit from the PAWS statement and the USI affidavit.		"June 2-6, 1999,			
This account was omit from the PAWS statement and the USI affidavit. This account was omit from the PAWS statement and the USI affidavit.		make them go faster."			
This account was omit from the PAWS statement and the US affidavit. This account was omit from the PAWS statement and the US affidavit.		smacking the elephants to			
This account was omit from the PAWS statement and the US affidavit. This account was omit from the PAWS statement and the US affidavit.		The handlers were			
This account was omit from the PAWS statement and the US affidavit. This account was omit from the PAWS statement and the US affidavit.		was pouring down rain.			
This account was omit from the PAWS statement and the US affidavit. This account was omit from the PAWS statement and the US		and hit on the walk. It			
This account was omit from the PAWS statement and the US affidavit. This account was omit from the PAWS		elephants were hooked			
This account was omit from the PAWS statement and the US affidavit. This account was omit		Wayne, IN. Again the			-
This account was omit from the PAWS statement and the USI affidavit.		"May 26-30, 1999, Ft.	400-400-400-400-400-400-400-400-400-400		
This account was omit from the PAWS statement and the US					
This account was omi	-	beating the elephants."			
This account was omit		Antonio, TX. Adam was			
aiiidavit.		"May 12-16, 1999, San			
aiiidayit.		the arena."			
aindavit.		hooked when they got to			
		train, hooked on the walk,			
statement and the USDA		hooked getting off the			
from the PAWS		OK. The elephants were			
This account was omitted		"May 5-8, 1999, Tulsa,			
			Karen' for playing with each other."		
elephants.		beaten."	could beat 'Sophie and		
allegedly beaten		Nicole was also severely	(close the tent), so they		
added to the list of		named Sophie and Karen;	side wall on the tent		
four years later, Nicole is		Handlers beat elephants	and Adam had me drop a		
answers the interrogatory		Chattanooga, TN.	Chattanooga, TN - Randy		
By the time Rider		"April, 1999,	"21.) April 1999,		
		behind the legs."			
		show, beating them			
		elephants went into the			
ler Claims He Made About Abuse	Rider Cla	(6/3/04)		(6/13/00)	(3125/00)
cluding Complaints		Responses, No. 11	(7/20/00)	Statement	этатешен
Other Contexts,	Other	Interrogatory	USDA Affidavit	Congressional	PAWS
rious Statements in Comments	Various S	Ex. 70, Rider Original	Ex. 69, Rider	EX. 68, Kider	Ex. 67, Kider

Responses, No. 17 (6/3/04). See also Ex. 73,					pp. 49-50.]
Original Interrogatory					elembant " [Tr
2000, Ex. 70, Rider					Feld's danghter's
Unit in the period since					know because
several visits to the Blue					would like to
because he had made					after that. I
the whereabouts of Nicole					happened to her
2004 Rider likely knew					know what
made a video of her Rv					the farm. I don't
where Rider himself later					they took her to
returned to the Blue Unit			'Nicole', no one knows."		They said, well,
to Nicole because she was			what ever happened to		swelled up.
nothing had "happened"			asked numerous people		infected and
that Rider knew that			U.S. into Canada. I have		bad, have
stemmed from the fact			were moving from the		getting awful
the interrogatory answer			inspecting us, because we		Her leg was
that the omission from			the USDA would be		arthritis from it.
be reasonably inferred			had swollen. We knew		was developing
USDA affidavit. It could			marks on her leg, which		her. I know she
it was included in the			USDA to see all the hook		get into and hook
answer in 2004 although			They didn't want the		to (unintelligible)
from the interrogatory			because of all the scars.		that Randy used
Blue Unit was omitted			trucked back to Florida,		She was the one
mysteriously from the			taken off the train and		the farm, quote.
disappearing			elephant 'Nicole' was		longer she is at
The story about Nicole			"22.) June 21, 1999 – the		"Nicole is no
		they got off the train."			
affidavit		the train, hooking when			
statement and the IISDA		hitting of the elephants on			
from the PAWS		OH. Again hooking and			
		"[]une 0_13 1000 Toledo			
		they didn't do something right."			
		show, hooking whenever			
	Rider Claims He Made About Abuse.	(6/3/04)	(120100)	(6/13/00)	(3/25/00)
Comments	Other Contexts,	Interrogatory	USDA Affidavit	Congressional	PAWS
		Fr 70 Pider Original	Fy 60 Rider	Fy 68 Ridor	Er 67 Rider

Ex. 67, Rider PAWS Statement (3/25/00)	Ex. 68, Rider Congressional Statement (6/13/00)	Ex. 69, Rider USDA Affidavit (7/20/00)	Ex. 70, Rider Original Interrogatory Responses, No. 11 (6/3/04)	Various Statements in Other Contexts, Including Complaints Rider Claims He Made About Abuse.	Comments
					Rider Dep. at 108 (10/12/06) (admitting that he had observed the Blue Unit elephants "40, 50 times" since he left the employ of FEI. These facts that are inconsistent with the allegation of "injury in fact" that Rider made to the D.C. Circuit, i.e., that he avoided visiting the Blue Unit elephants to avoid further "aesthetic injury." See ASPCA v. Ringling Bros. and
	"Another time, in Ottawa, Canada, in the	"32.) June 1999, Ottawa, Canada – five elephants	"June 23-27, 1999, Ottawa, Ontario, Canada.	"June 23-27, 1999, Ottawa, Ontario, Canada.	The account of this incident admits that the
	and the elephants were contained behind their	get into a right in the exercise pen. We were using the new exercise	fighting and broke down the fence. The next thing	I was yelled at by Randy Peterson because I refused to hit the	elephants were not chained and were being contained with an electric
	electric fence. I was approximately 75 yards	pen instead of chaining the elephants in a line.	I knew, Adam came running, grabbed his bull	elephants with a bull hook when the elephants	fence which is inconsistent with Rider's
	away cleaning when I heard an elephant	All five elephants broke out of the pens, two ran	hook, ran in and started hitting every elephant.	started fighting and broke down a fence. He	repeated assertion that the elephants were
	scream. When I turned around, I saw three	into the horse tent and three continued to fight. I	Pat Harned grabbed his bull hook, ran in and did	threatened my job because I was	chained "24/7" unless in performance or
	elephants fighting and two others were	was lucky that the two elephants went into the	the same. Randy Peterson joined in and hit	complaining about him and the other handlers	rehearsal. The statement to Congress, in support of
	heading for the horse	horse tent, because I was	the elephants: all three of	hitting the elephants."	a bill to ban elephants
	through the fence.	the animals and I had no	hitting and yanking on	Interrogatory Responses,	"dangerous," does not

		Ex. 67, Rider PAWS Statement (3/25/00)
	Since I was alone, I was unable to control the situation. It took about five minutes before I could get help and another five minutes before we could begin to regain control. During this time, if the elephants had run in a different direction and had not moved toward the horses, they would have been right in the middle of the public."	Ex. 68, Rider Congressional Statement (6/13/00)
	way of stopping the elephants from leaving (they could have easily just ran [sic] 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 and that that time."	Ex. 69, Rider USDA Affidavit (7/20/00)
"July 2-11, 1999, Toronto, Ontario, Canada. The elephants were hit and hooked."	those elephants, smacking them to get them back in that pen."	Ex. 70, Rider Original Interrogatory Responses, No. 11 (6/3/04)
"July 2-11, 1999, Toronto, Ontario, Canada. I called the Union in St. Louis and I told them that my job had been threatened because they were beating the animals again." Ex. 70, Rider Original Interrogatory	No. 15 (6/3/04). Q: "My only concern is if an elephant in a circus situation were totally out of control, what would be the method of stopping the elephant?" Rider: "If an elephant is out of control? About the same thing that happened to Tyke or to, one of our other speakers will be telling you about an incident that happened in Florida. They're going to get shot." Ex. 72, Rider Statement to Nebraska Legislature (1/25/06).	Various Statements in Other Contexts, Including Complaints Rider Claims He Made About Abuse
Both of these accounts were omitted from the PAWS statement and the USDA affidavit.	acknowledge (as do the later statements) that the handlers regained control of the situation by use of the guide. The statement to Congress omits the point that Rider was counseled by his FEI supervisor for not regaining control of the situation. Rider's statement to the Nebraska legislator flatly states that the only way to regain control of an out-of-control elephant is with a firearm and omits the fact that, by Rider's own account, handlers can regain control elephants by use of the guide, as was the case in Rider's own account of Ottawa.	Comments

statement and the USDA		uning in Natisas City			
from the PAWS		Kansas City, MO. Same			
This account was omitted		"Sept. 8 -27, 1999,			
		show."			
affidavit.		train and before the			
statement and the USDA		hooked and hit on the			
from the PAWS		IL. The elephants were			
This account was omitted		"Sept. 2-5, 1999, Moline,			
affidavit.		hooking and hitting."			
statement and the USDA		of hooking and hitting,			
from the PAWS		Wichita, KS. Again, lots			
This account was omitted		"Aug, 26-29, 1999,			
affidavit.		hooked and hit."			
statement and the USDA		Again, the elephants were			
from the PAWS		Colorado Springs, CO.			
This account was omitted		"Aug. 18-22, 1999,			
		him."			
		whole time he was with			
		Harned beat Benjamin the			
		Benjamin met his fate.			
		Houston and Dallas			
		and somewhere between			
		hooked by Pat Harned,			
		Benjamin was beat and			
		Benjamin's life.			
		coming to the end of			
		this was unfortunately			
		and the big ones inside,			
		The babies were outside,			
affidavit.		hooking of the elephants.			
statement and the USDA		a lot of hitting and			
from the PAWS		Houston, TX. There was			
This account was omitted		"July 16-25, 1999,			
	(6/3/04).				
日本日本の日本の日本の日本の一日本の一日本の日本の一日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日本の日	Responses No. 15				
	About Abuse.	(0/3/04)	19 10 10 10 10 10 10 10 10 10 10 10 10 10	footeral	(non-in-
	B 2	Kespouses, No. 11	(1120100)	TESTESISCE TO THE STREET	mainaisie.
	Other Contexts,	Denotes No 11	TOURALIDAVII.	Statement	FAWS
Comments	Various Statements in	Ex. /0, Kuder Original	Tions of Muer	EA. 00, Nucer	DAILIE TA
		には は のは いっぱい こうしゅう いっぱい ない はない はない ない ない ない はない ない な	を できる		を存在した。これには、大きのは、

reference (in the PAWS	circus about the treatment of the elephants? A. Yes.	came up from the Ringling breeding farm in			November, Jeff Steele was kind
The 2004 interrogatory answer eliminates the	"Q. Did you ever complain to anyone at the	"Oct. 15-24, 1999, Boston, MA. James, who			"Just prior to when I left in
			freezing cold; there was not [sic] heat on the train car."		
			it very cold, snowing and the elephants were		
			"25.) October 1999, travel from Detroit to Boston –		
affidavit.		of the elephants."			
statement and the USDA		more hooking and hitting			
This account was omitted		MA [sic]. There was			
affidavit.		hitting of elephants."			
statement and the USDA		thing: lots of hooking and			
from the PAWS		Buffalo, NY, Same			
This account was omitted		"Sept. 30-Oct. 3, 1999,			
		these elephants."			
		was going all out beating			
affidavit.		and hit. Randy Peterson			
statement and the USDA		elephants were hooked			
from the PAWS		Grand Rapids, MI. The			
This account was a sixt of		"Sent 22-25 1999"			
		them hit the elephants."			
		the public couldn't see			
alluavit.		would close the flaps so			
affidavit		hooked: the handlers			
statement and the IICDA		the elephants were hit and			
from the DAW'S		Indianapolis, IN. Again.			
		"Sart 15 10 1000			
		nitting of elephants with			
affidavit.		lots of hooking and			
	Rider Claims He Made About Abuse:	(6/5/04)	一種子 おおかん	(00/2/10)	(more rich
	Including Complaints	Kesponses, No. 11	(7/20/00)	Statement	Statement
	Other Contexts,	Interrogatory	USDA Affidavit	Congressional	PAWS
Comments	Various Statements in	Ex 70, Rider Original	Ex. 69, Rider	Ex. 68, Rider	Ex. 67, Rider

the elephant for a second. (Pause.)	"Let me think of	made that	that Jeff Steele	circumstances	were the	it." Q. What	didn't want to see	there. He just	they would be	them. He knew	didn't want to see	marks. He just	mare book	say ne didn't	heard Jeff Steele	ever stops, if he	course, nobody	it again. Of	He is going to do	going to pay?	Well, what is he	going to pay.	somebody is	elephants,	marks on these	any more hook	saving, 'If I see	would get mad,	marks. He	on all the hook	of coming down	(00/67/6)	Statement	PAWS	Fx. 67. Rider
																																(00/CL)O)	Statement	Congressional	Ex 68 Rider
																				A													(7/20/00)	USDA Affidavit	Fx 69 Rider
																									elephants."	hooking the baby	Dave Whalev hitting and	I saw Gary Jacobson and	baby elephants there, and	elephant. There were five	Florida, was hitting an	(0/3/04)	Responses, No. 11	Interrogatory	Ex 70 Rider Original
											***************************************														(10/12/06)	Rider Dep. at 82	That's about it " Ex 73	Alex Vargas, Jeff Steele	Harned, Randy Peterson.	complain to? A. Pat	O. Who did vou	About Abuse	TID OR	Other Contexts,	Various Statements in
company management would not have	complaining about	instant case that	current theory of the	consistent with Rider's	PAWS statement, are not	acknowledged in Rider's	Steele's actions, as	stems from the fact that	interrogatory answer	of this fact from the 2004	argued that the omission	It could reasonably be	FEI management did not	elephants and, therefore,	hook marks on the	pay" if there were further	"somebody is going to	Steele stated that	PAWS statement that	acknowledged in the	Steele's actions, he	own interpretation of	Although Rider had his	marks on the elephants	with respect to hook	counseling of employees	surrounding Stoole's	circumstances	worked for FED and the	Unit at the time Rider	(the manager of the Blue		· · · · · · · · · · · · · · · · · · ·	Comments	では、 は、 は

from head	see the big cuts,	head. When you	mark on the	and got a big	butting contest	got in a head	something. She	was Myso or	forget whether it	butting with I	She got in a head	she had a baby.	Mini, because	of them was on	on. I know one	what brought that	curtain. That's	are going in the	them before they	actually seen	I think he	before the show.	to be covered up	gashes, that had	were cuts,	trunk. These	marks on their	had big hook	and Mini both	Sophie. Sophie	no, it was	me it was Mini	It would seem to	(3/25/00)	Statement	Ex. 67, Rider PAWS
																																		(6/13/00)	Statement	Ex. 68, Rider Congressional
																										-								地方とは	(7/20/00)	Ex 69, Rider USDA Affidavit
																																		(6/3/04)	Responses, No. 11	Ex. 70, Rider Original
																																			Including Complaints	Various Statements in Other Contexts
														Dep. at 259 (10/12/06).	to Steele, Ex. 73, Rider	fact not made a complaint	admitted that he had in	No. 15 (6/3/04), he	Interrogatory Responses.	70, Rider Original	had complained, see Ex.	the people to whom Rider	named Steele as one of	interrogatory answers.	that he had not, in his	was pointed out to Rider	the elephants. When it	about the treatment of	complained to Jeff Steele	stated that he had	In his denosition Rider	£	accomplished anything		· · · · · · · · · · · · · · · · · · ·	Comments

statement and the USDA	oking	there was lots of hooking			
from the PAWS	gain,	Pittsburgh, PA Again,			
This account was amitted	9.	"Oct. 27-31, 1999.			
	=				[Tr. 66-68.]
					around Boston."
					finished up
	-				before we were
					two weeks
	-				in it was about
					know? This was
					game here. You
		5. 10 11. 10			years into the
		·			late. It is two
					you are a little
					thought, well,
					that day, I
					thinking, myself,
***************************************					like that. I'm
	· · · · · · · · · · · · · · · · · · ·				more hook marks
***************************************					want to see any
			- daylar		said he didn't
					of the tent and
					actually came out
					mouth. He
					right out of his
					(Unintelligible)
					told us off.
					came out and
	• • • • • • • • • • • • • • • • • • • •				That's when he
	-				from a hook.
					is a big slice
					on the top there
			,		you look down,
	••••				not a hook. Then
				The second secon	butting. That's
out Abuse.	Abo	Constant of the Constant of th			
ing Complaints	Bidar	Kesponses, No. 11	(1120/00)	(6/13/00)	(3/25/00)
her Contexts,	Oth	Interrogatory	USDA Affidavit	Congressional	PAWS
rious Statements in Comments	L Va	Ex. 70, Rider Origina	Ex. 69, Kider	EX. 08, Kider	EX. 0/, Kider
		Se service de la company de la		The state of the state of	では、日本のでは、日本には、日本ので