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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

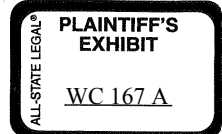
AMERICAN SOCIETY FOR THE)	
PREVENTION OF CRUELTY TO)	
ANIMALS et al,)	
)	
Plaintiffs,)	Case No: 03-2006
)	(EGS/JMF)
v)	
)	
FELD ENTERTAINMENT, INC.,)	
)	
Defendant.)	
_____)	

*** CONFIDENTIAL - ATTORNEYS' EYES ONLY ***

Videotaped Deposition of
Sacha Houcke
taken on
Monday, January 7, 2008

CERTIFIED COPY

Reported by: Paul Brincau, MBIVR, ACR



1 Videotaped deposition of Sacha Houcke, taken on
2 behalf of the parties at 47, avenue Georges Mandel,
3 75116, Paris, France, on Monday, January 7, 2008, at
4 1:12 p.m. before Paul Brincau, ACR, pursuant to
5 notice.

6
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(Present via videoconference)

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23 **ALSO PRESENT:**

24 Julie Strauss, In-house Counsel, Feld Entertainment
25 Stephen Faigenbaum, Videographer

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INDEX

Witness	Examination	Page
Sacha Houcke	(By Ms. Joiner)	5
	(By Ms. Meyer)	61
Exhibits (attached hereto)		
1	Document 113-2 Plaintiffs Exhibit LL	35
2	Document 113-3 Plaintiffs Exhibit MM	43

Monday, January 7, 2008, Paris, France

- - -

Sacha Houcke,

having been duly sworn,

was examined and testified as follows:

EXAMINATION

BY MS. JOINER:

Q. Mr. Houcke, would you give us your full name?

A. Sacha Houcke.

Q. Okay. Is there any reason today why you could not testify truthfully and completely?

A. No.

Q. Okay. And at any time, if you do not understand what I am asking, do you agree to stop me for clarification?

A. Yes.

Q. What time period did you work for Ringling Brothers Circus?

A. From November 2000 to November 2006.

Q. What was your title?

A. Animal Care Director and Trainer.

1 Q. And what kind of responsibilities or duties
2 did you have with your job?

3 A. To train the animals, to take care of their
4 welfare and then take care that they were
5 well-treated.

6 Q. Which animals did you work with?

7 A. With the horses, exotics and elephants.

8 Q. Which unit did you work for?

9 A. The Red.

10 Q. Did you ever work for the Blue Unit?

11 A. Never.

12 Q. Did you ever have any contact with any
13 animal that was on the Blue Unit?

14 A. Never.

15 Q. Did you ever work at the Ringling Brothers
16 Center for Elephant Conservation?

17 A. Never.

18 Q. Have you ever handled any of these elephants
19 -- and I am going to have a list of them and you can
20 tell me?

21 A. From the Blue Unit?

22 Q. Yes --

23 A. No.

24 Q. -- I will give the names of them. Are you
25 familiar with an elephant named Karen?

1 sure that the elephants performed their tricks during
2 the performance?

3 MS. JOINER: Objection to form.

4 THE WITNESS: Yes.

5 BY MS. MEYER:

6 Q. And did you have responsibility for the
7 horses, did you say, at Feld Entertainment?

8 A. Also, yes.

9 Q. And did you also have responsibility for
10 thee Camels at Feld Entertainment?

11 A. Yes.

12 Q. And when you were hired in November 2000,
13 were you give a written contract with the terms of
14 your employment?

15 A. Yes.

16 Q. Who gave you that contract?

17 A. Tim Holst.

18 Q. Who was Tim Holst?

19 A. The person who books the acts for Ringling.

20 Q. Do you know his title?

21 A. Talent -- Director of Talent.

22 Q. What was the terms of the contract that you
23 received in November 2000 when you became employed
24 with Feld Entertainment?

25 A. What do you mean?

1 worked for the Ringling Brothers Circus?

2 A. For Ringling Brothers, yes.

3 Q. Who?

4 A. My Auntie Nadia in 1953, '4 and '6 -- '3, '4
5 and '5.

6 Q. I am sorry, I did not hear that answer.

7 Could you repeat that?

8 A. In 1954, '5 and '6.

9 Q. Who was that?

10 A. My Aunt Nadia.

11 Q. What did your Aunt Nadia do for the Ringling
12 Brothers Circus?

13 A. Horses.

14 Q. She worked with the horses?

15 A. Yes.

16 Q. Any other family members who ever worked for
17 Ringling Brothers Circus?

18 A. No.

19 Q. You mentioned that your daughter Sarah
20 worked for the Blue Unit for some period of time; is
21 that correct?

22 A. Yes.

23 Q. When was that?

24 A. From 2000 to 2004.

25 Q. Did she have responsibilities for the

1 elephants when she worked on the Blue Unit?

2 A. No, she worked with the elephants but she
3 had no responsibility for the elephants.

4 Q. When you say she worked with the elephants,
5 what do you mean?

6 A. Present them in the ring.

7 Q. Did you ever have an opportunity to observe
8 her presenting them in the ring when she worked for
9 the Blue Unit?

10 A. Yes.

11 Q. How many times did you have the opportunity
12 to observe her present the elephants in the ring when
13 she worked for the Blue Unit?

14 A. I don't recall. I don't remember, but a
15 couple of times.

16 Q. Do you remember what year you had an
17 opportunity to observe her working with the elephants
18 at the Blue Unit?

19 A. Yes, every year, at least one time every
20 year.

21 Q. Okay. So at least one time every year
22 between 2000 and 2004; is that correct?

23 A. Correct.

24 Q. Did you have an opportunity to observe any
25 other employees at the Blue Unit who worked with the

1 elephants?

2 A. No.

3 Q. You only observed your daughter working with
4 the elephants when she left to the Blue Unit?

5 A. Yes.

6 Q. And did your daughter Sarah learn how to
7 handle elephants from you?

8 A. With me, yes.

9 Q. Is it fair to say that she uses the same
10 technique that you use to handle elephants?

11 A. Yes.

12 MS. JOINER: Objection to form.

13 BY MS. MEYER:

14 Q. And based on your observation of the Blue
15 Unit, are the elephants at the Blue Unit treated the
16 same as the elephants at the Red Unit?

17 A. Yes.

18 MS. JOINER: Objection to form, lack of
19 foundation.

20 BY MS. MEYER:

21 Q. You are being deposed here today voluntarily
22 at the request of Feld Entertainment; is that
23 correct?

24 A. Correct.

25 Q. And you did not have to be subpoenaed to

1 this deposition?

2 A. Yes.

3 Q. How did you obtain a day off from work?

4 A. Luckily that we have no show today.

5 Q. Did you consider hiring an attorney to
6 represent you at this deposition?

7 A. No.

8 Q. When did you say you left your employment
9 with Feld Entertainment?

10 A. November 2006.

11 Q. And why did you leave?

12 A. Because I wanted to come back to France.

13 Q. There were no other reasons why you left
14 your employment with Feld Entertainment in November
15 2006?

16 A. No.

17 Q. Were you asked to leave Feld Entertainment
18 by anyone at Feld Entertainment?

19 A. No, I left on my own will. I had been asked
20 to stay -- different.

21 Q. You were asked to stay?

22 A. They asked me to stay and I said, "no, I
23 want to leave".

24 Q. Who asked you to stay?

25 A. Mr. Holst.

1 Q. Did anyone else discuss your staying with
2 Feld Entertainment?

3 A. No.

4 Q. Were you informed by any Feld Entertainment
5 official that your contract will not be renewed?

6 A. No.

7 Q. Did you have any discussions with anyone,
8 other than Mr. Holst at Feld Entertainment concerning
9 your leaving the Red Unit in November 2006?

10 A. No.

11 Q. You did not discuss your leaving with anyone
12 else on the Red Unit?

13 A. No. My contract was with Mr. Holst, and I
14 discussed my contract with Mr. Holst.

15 Q. I am asking you whether or not you discussed
16 with any of the other employee the fact that you were
17 leaving the Red Unit in November 2006?

18 A. Everybody knew I was leaving, yes.

19 Q. I am asking you if you had any conversation
20 with anyone about the fact that you were leaving in
21 November 2006?

22 A. No.

23 Q. No?

24 A. No.

25 Q. Mr. Houcke, you worked at the Red Unit for

1 "yes," that's it, it's over. No conversation
2 about --

3 Q. I am sorry?

4 A. I said they asked me and I told them I am
5 leaving, but it was not -- I did not tell them the
6 whole story. I just said "I am leaving, it's
7 finished".

8 Q. Did they ask you why you were leaving?

9 A. I said I wanted to go back to Europe.

10 Q. Did they try to convince you to stay?

11 A. Some of them, yes, they wanted me to stay.

12 Q. Who was that?

13 A. Like Jimmy Strickland, Pista, Kelly -- most
14 of them.

15 Q. When you were employed by Feld
16 Entertainment, did you have an e-mail account that
17 you used?

18 A. My private, yes.

19 Q. Did you have any communications over your
20 e-mail account about your decision to leave the Red
21 Unit in November 2006?

22 A. No.

23 Q. None?

24 A. None.

25 Q. Did the termination of your employment with

1 Feld Entertainment in November 2006 have anything to
2 do at all with allegations that you were mistreating
3 animals at the Red Unit?

4 A. No.

5 Q. Did the termination of employment with Feld
6 Entertainment in November 2006 have anything to do
7 with allegations that you were too aggressive to the
8 animals?

9 A. No.

10 Q. Did your termination of employment at Feld
11 Entertainment in November 2006 have anything to do
12 with allegations that you were mistreating animals
13 had been publicly disseminated?

14 A. No. I left on my own decision.

15 Q. Did you ever receive a written reprimand
16 with respect to your treatment of any of the animals
17 on the Red Unit?

18 A. Never.

19 Q. Did you ever receive an oral reprimand with
20 respect to your treatment of any of the animals on
21 the Red Unit?

22 A. No.

23 Q. You were never reprimanded by anyone working
24 at Feld Entertainment concerning your treatment of
25 any of the animals during your tenure at Feld

1 Entertainment, is that correct?

2 A. That is correct.

3 Q. Who was your supervisor on the Red Unit, was
4 it Mr. Griggs?

5 A. First of all it was Mr. Gaipo and then
6 Mr. Griggs.

7 Q. Mr. Gaipo is Mark Gaipo, is that correct?

8 A. Exactly, correct.

9 Q. And what years was Mr. Gaipo your
10 supervisor?

11 A. From 2000 to 2005.

12 Q. And Mr. Griggs was your supervisor from 2005
13 to 2006?

14 A. No, 2006 only.

15 Q. I am sorry?

16 A. 2006 only. Gaipo until the end of 2005;
17 2006 it was Griggs then, and there was somebody in
18 between, somebody else in between -- Angie, I forget
19 her name.

20 Q. There was -- I am sorry -- there was a third
21 person who was your supervisor?

22 A. Yes, Angelina Jolie -- I forgot her name;
23 Angelina.

24 Q. When was she your supervisor?

25 A. She was only short, at the beginning of the

1 place to work for.

2 Q. Do you have any plans to return to Feld
3 Entertainment in the future?

4 A. For now, no.

5 Q. At any time in the future?

6 A. No idea, I do not know.

7 Q. Have you ever discussed the possibility of
8 your return to work for Feld Entertainment?

9 A. No.

10 Q. You never discussed that with anyone?

11 A. No.

12 Q. Did you discuss with anyone when you left
13 Feld Entertainment the possibility that you could
14 come back?

15 A. Mr. Feld said I could come back any time I
16 want.

17 Q. And you mentioned a woman named Carey
18 Coleman. Who is she?

19 A. Veterinary technician.

20 Q. And did she work on the Red Unit when you
21 worked on the Red Unit?

22 A. Yes, she did.

23 Q. What time period did she work on the Red
24 Unit?

25 A. Excuse me?

1 their place.

2 Q. It is true elephants are sometimes loaded on
3 the train several hours before the train actually
4 leaves a venue for the next venue; isn't that
5 correct?

6 A. It depends how fast the train is ready to
7 leave, yes.

8 Q. And it's also true that the elephants are
9 sometimes loaded on the train the night before the
10 train leaves a venue for the next venue; is that
11 correct?

12 A. No. The train leaves always in the night or
13 early in the morning.

14 Q. It's true though that the elephants are
15 sometimes loaded onto the train -- strike that.

16 When the train arrives at a new venue, it is
17 true the elephants are sometimes left on the train
18 for some period of time before they are unloaded; is
19 that correct?

20 A. As soon as the train is in place, we unload
21 the elephants.

22 Q. Well, isn't it true that sometimes you have
23 to wait for the police to show up before the
24 elephants could be unloaded?

25 A. That can happen.

1 Q. Sometimes the police -- it takes a while for
2 the police to show up; doesn't it?

3 A. Sometimes, because when --

4 Q. And at the time --

5 A. Because when that --

6 Q. Let me ask my question.

7 MS. JOINER: He is still answering.

8 THE WITNESS: Sometimes what happened, the
9 train gets early in the town, and the police is not
10 prepared to get there and we have to wait for the
11 police to get there. That is why.

12 BY MS. MEYER:

13 Q. Thank you.

14 And during that time the elephants remain on
15 the train in their chains; is that correct?

16 A. It is correct.

17 Q. Now turning to the Tulsa, Oklahoma, incident
18 that you testified about earlier. Do you agree that
19 the Red Unit had a lay over for approximately 2 weeks
20 in Tulsa, Oklahoma, at the end of May and the
21 beginning of June 2006?

22 A. Yes, it is correct.

23 Q. And the Red Unit was staying at the
24 fairgrounds in Tulsa, Oklahoma, is that correct?

25 A. Correct.

1 Q. And you agree that some of the elephants got
2 into a fight; is that correct?

3 A. Correct.

4 Q. And that two elephants that got into the
5 fight were Baby and Banco; correct?

6 A. Exactly, correct.

7 Q. And you agree that you had to stop the
8 elephants from fighting; is that correct?

9 A. I had to go in and stop the fight, that is
10 correct.

11 Q. And you said that when you stopped the
12 fighting and tied up the elephants, and when you said
13 "tied up," you mean put them on chains; is that
14 correct?

15 A. Exactly.

16 Q. And did you have to discipline the elephants
17 for getting into the fight?

18 A. At the end of the fight I had to give them
19 some commands to make sure that they were finished,
20 they were calmed down, and they were obeying to the
21 commands.

22 Q. And did you consider your behavior towards
23 the elephants at that point in time to be
24 disciplining the elephants?

25 A. Yes.

1 Q. And so you agree that you engage in some
2 form of disciplinary treatment of the elephants who
3 had been fighting; is that correct?

4 A. No.

5 Q. You didn't discipline the elephants?

6 A. I disciplined -- I give them some commands
7 to make sure that they were calmed down.

8 Q. I am a bit confused because you earlier said
9 that you did consider your attitude towards them --

10 A. Yes, if you take it like that, yes.

11 Q. That is all I am asking.

12 So you do agree that you engaged in some
13 form of discipline of the elephants?

14 A. Yes.

15 Q. Because they were fighting.

16 A. Yes.

17 Q. Sorry?

18 A. Yes.

19 Q. And you said -- did this discipline involve
20 chaining the elephants?

21 A. It did.

22 Q. And did it involve making the elephants lie
23 down on all four legs?

24 A. It did.

25 Q. Is that sometimes referred to as "stretching

1 out"?

2 A. No, just to lay down, not stretch out.

3 Q. Is it sometimes referred to as "tie out"?

4 A. Just lay down.

5 Q. And did the discipline also involve making
6 the elephants put their trunks up?

7 A. Yes.

8 Q. And did it also involve making them hold
9 that position for some period of time?

10 A. Yes.

11 Q. And how long did you require the elephants
12 to hold that position?

13 MS. JOINER: Objection to form.

14 THE WITNESS: 30 second, 40 second.

15 BY MS. MEYER:

16 Q. That's all?

17 A. Yes.

18 Q. And who was present during the disciplining
19 of the elephants -- let me ask you, actually -- you
20 say Mr. Vargas, Alex Vargas, was present; is that
21 correct?

22 A. Yes, correct.

23 Q. And you said Pista was present; is that
24 correct?

25 A. Correct.

1 Q. And I think you said Jimmy Strickland was
2 also present; is that correct?

3 A. Yes.

4 Q. You said Archele Hundley was present; is
5 that correct?

6 A. She could have been, she was outside the
7 barn, yes.

8 Q. I think you said that Mr. Robert Tom was
9 also present; is that correct?

10 A. He was there, yes.

11 Q. Sorry?

12 A. Yes.

13 Q. Was there an individual named David Hackett
14 who was present while you were disciplining the
15 elephants?

16 A. Who?

17 Q. David Hackett?

18 A. I forgot, I do not know. I don't remember
19 him.

20 Q. Okay. How about a person named Garrison
21 Christiansen, was he present during the time you were
22 disciplining the elephants?

23 A. It is possible. He was there at this time.

24 Q. Do you know Garrison Christiansen is?

25 A. Yes, I remember him.

1 A. No. It seems very long, 10 minutes.

2 Q. And do you agree that one of the elephants
3 was not immediately obeying the command to lie
4 down --

5 A. Exactly.

6 Q. -- when you were disciplining the elephants
7 for getting into the fight?

8 A. Exactly.

9 Q. And the elephant who would not obey your
10 command immediately was Banco; is that correct?

11 A. Correct.

12 Q. And is it your testimony that you never hit
13 either Banco or Baby with a bullhook during the
14 incident when you were disciplining them for getting
15 into a fight; is that correct?

16 A. Correct.

17 Q. But you did testify that you tapped Banco on
18 the head and behind the ear with your guide to make
19 her lie down; is that correct?

20 A. Not on the head, on the top of her back.

21 Q. So you do agree that you tapped Banco on the
22 top of her head with your guide to make her lie down,
23 to make her lie down during this incident; is that
24 correct?

25 MS. JOINER: Objection. Misstates the

1 testimony.

2 BY MS. MEYER:

3 Q. I am sorry?

4 A. On the back, not on the head.

5 Q. Just to clarify, you tapped Banco on her
6 back?

7 A. Exactly.

8 Q. With your guide, to make her lie down as
9 part of this disciplinary action; is that correct?

10 A. Exactly, correct.

11 Q. And when you say "your guide," you mean a
12 bullhook; is that correct?

13 A. I call it a guide, exactly.

14 Q. Is the "guide" also a "bullhook"?

15 A. That is the way I call it, the guide.

16 Q. But is it also referred to as a "bullhook"?

17 A. If you want to call it like that, it is
18 right.

19 Q. You know what I am talking about, correct?

20 A. Yes, the guide.

21 Q. Okay. And "ankus" would also be a synonym
22 for a guide; is that correct?

23 A. Exactly.

24 Q. And I thought you also said that you also
25 tapped Banco on the ear with your guide during this

1 incident; is that correct also?

2 A. I touched her by the ear to make her go
3 over.

4 Q. So you touched Banco on the back --

5 A. Yes.

6 Q. -- with your bullhook to make her lie down,
7 and then you touched her on her ear with your
8 bullhook to make her turn over; is that correct?

9 A. Turn over, yes.

10 Q. And did you also tap or touch Baby with your
11 bullhook at all during this incident?

12 A. No, I did not have to.

13 Q. And is it your testimony that when you
14 worked on the Red Unit you never hit the elephants
15 with a bullhook; is that correct?

16 A. Correct; I touched but not hit.

17 Q. You admit you touched elephants --

18 A. Yes.

19 Q. -- with bullhooks --

20 A. Yes, I touched --

21 Q. -- when you worked on the Red Unit; is that
22 correct?

23 A. Yes.

24 Q. How often did you touch elephants with
25 bullhooks when you worked on the Red Unit?

1 **A.** It depends.

2 **Q.** Was it a daily occurrence?

3 **A.** Could have been.

4 **Q.** And is it your testimony that you never made
5 an elephant bleed as a result of hitting it with a
6 bullhook when you worked on the Red Unit?

7 **A.** Exactly.

8 **Q.** So if anyone testified that they saw you hit
9 an elephant with a bullhook and then saw a bloody
10 wound on that elephant, they would be mistaken or
11 lying; is that correct?

12 **A.** Mistaken.

13 **MS. JOINER:** Objection. Argumentative.
14 Calls for speculation.

15 **BY MS. MEYER:**

16 **Q.** Sorry. When you worked on the Red Unit, did
17 you ever hit an elephant with a whip?

18 **A.** No.

19 **Q.** Did you carry a whip when you worked on the
20 Red Unit?

21 **A.** No.

22 **Q.** You never used a whip at all when you worked
23 on the Red Unit?

24 **A.** No, not with the elephants.

25 **Q.** Did you use the whip with the horses?

1 A. Yes.

2 Q. Did you use the whip with the camels?

3 A. Yes.

4 Q. Did you ever whip a horse with a whip --

5 A. No.

6 Q. -- when you worked on the Red Unit?

7 A. No.

8 Q. You never used your whip on a horse; is that
9 correct?

10 A. The whip is a prolongation of my arm. I
11 touched them with the whip to give them command and
12 signs.

13 Q. So you touched the horses with the whip --

14 A. I touched them, exactly. Because for me
15 there is a big difference between hitting and
16 touching.

17 Q. Okay. I did not ask about hitting, I asked
18 about whether or not you whipped a horse with the
19 whip when you worked on the Red Unit? What's the
20 answer to that question?

21 A. I do not whip a horse.

22 Q. But you touched a horse?

23 A. Touched, yes.

24 Q. When you say touched the horse with the
25 whip, you touched the horse with the end of the whip?

1 A. Yes.

2 Q. Explain to me how you do that?

3 A. I give a command to the horse, and then I
4 let my whip go to touch the horse. If I was near the
5 horse, I would touch him with my hand, but the horse
6 is 15 feet away from me. Then I have to have a
7 prolongation of my arm, that is the whip, and I touch
8 the horse. And if you came to see me practice or you
9 take an interest in our job, you would come to see us
10 do this trick, do this, and then you would understand
11 what I am talking about.

12 Q. And where on the body of the horse would you
13 touch the horse with the whip when you worked on the
14 Red Unit?

15 A. Sorry?

16 Q. Where on body of the horse would you touch
17 the horse with the whip when you worked on the Red
18 Unit?

19 A. It depends what I want to tell him.

20 Q. Can you give me some examples of where --

21 A. If I want --

22 Q. Just let me finish my question.

23 Give me some examples of where on body of
24 the horse would you touch the horse with the whip
25 when you worked on the Red Unit?

1 **A.** If I want him to go out, I'll touch him on
2 the shoulder. If I want him to come to me, I touch
3 him on under the stomach. If I want him to go
4 forward, I touch him by the butt.

5 **Q.** Did you ever use the whip on a camel when
6 you worked at the Red Unit?

7 **A.** It is possible.

8 **Q.** And did you also have physical contact
9 between your whip and the camel when you worked on
10 the Red Unit?

11 **A.** If I did move the camel forward, or
12 whatever, I had to touch the camel -- I did, yes.

13 **Q.** And when you worked on the Red Unit did you
14 ever cause an abrasion on an elephant through the use
15 of your bullhook?

16 **A.** No.

17 **MS. JOINER:** Objection to form.

18 **BY MS. MEYER:**

19 **Q.** Did you ever cause an abrasion to an
20 elephant through the use of your whip when you worked
21 on the Red Unit?

22 **A.** No.

23 **MS. JOINER:** Objection to form.

24 **BY MS. MEYER:**

25 **Q.** As the Director of Animal Care at the Red

1 Unit, you had the responsibility for ensuring that
2 the elephants received proper medical care if they
3 were injured; is that correct?

4 A. Correct.

5 Q. And did you have responsibility for making
6 sure that the elephants would receive such care from
7 a veterinary?

8 A. Yes.

9 Q. And you said that as a result of the
10 incident in Tulsa that both Baby and Banco were
11 bleeding as a result of fighting with each other; is
12 that correct?

13 A. Correct.

14 Q. You said they had cuts on their bodies?

15 A. On their forehead and Banco on the back from
16 the tusks.

17 Q. And they were both bleeding; is that
18 correct?

19 A. Yes, uh-huh.

20 Q. And did you obtain medical care for the
21 elephants for this situation?

22 A. Yes. Carey Coleman came with me, brought me
23 the medicine, the disinfection.

24 Q. I am sorry, I didn't hear that.

25 A. Carey Coleman brought me the stuff to put

1 bop an elephant with a bullhook would you have
2 reprimanded that individual for that conduct?

3 A. Yes, he would get reprimanded.

4 Q. Would that call for a written reprimand?

5 A. Yes.

6 Q. So if anyone who worked at the Red Unit
7 admitted that they bopped elephants on the head with
8 a bullhook, he should have written reprimands in his
9 records; is that correct?

10 A. Correct.

11 Q. Do you know an elephant named Tonka on the
12 Red Unit?

13 A. Yes.

14 Q. You worked with Tonka when you were employed
15 at the Red Unit; is that correct?

16 A. Correct.

17 Q. Did you ever hook Tonka behind the ear with
18 a bullhook?

19 A. Hooked -- I may have been touched her behind
20 the ear, yes.

21 Q. I am sorry?

22 A. I did not hook her. Maybe I have to touch
23 her, but I don't remember now.

24 Q. You may have touched her behind the ear with
25 a bullhook?

1 A. Yes, to make her come towards me.

2 Q. Do you remember doing that?

3 A. It could have happened.

4 Q. How often would that have happened?

5 A. No idea.

6 Q. And if you had touched her behind the ear
7 with a bullhook, would it be with the hooked end of
8 the bullhook?

9 A. It depends. Could have been.

10 Q. It could have been?

11 A. Yes.

12 Q. And did you ever cause Tonka to bleed behind
13 the ear as a result of the use of the bullhook behind
14 her ear?

15 A. I don't recall.

16 Q. You might have done?

17 A. I don't remember.

18 Q. But you might have?

19 MS. JOINER: Objection. Argumentative.

20 Asked and answered.

21 THE WITNESS: I suppose so, but I don't
22 think so.

23 BY MS. MEYER:

24 Q. But it's possible, you said?

25 A. It's a possibility.

1 testimony Mr. Feld. Who is that?

2 A. Mr. Feld is the owner of Feld Entertainment.

3 Q. Is that Kenneth Feld?

4 A. Kenneth Feld, exactly.

5 Q. He is the head of Feld Entertainment; is
6 that correct?

7 A. Exactly.

8 Q. And when did you first meet Mr. Feld?

9 A. I meet Mr. Feld before I worked for them,
10 when he came to Europe.

11 Q. When was that?

12 A. 1998 I think.

13 Q. What were the circumstances of your meeting
14 Mr. Feld?

15 A. He just came to visit the circus I was
16 working for at the time.

17 Q. Which circus was that?

18 A. Circus Knie, K-N-I-E, Switzerland.

19 Q. Did you speak to Mr. Feld at that time?

20 A. Yes, I did.

21 Q. What did you talk about?

22 A. Circus.

23 Q. Did Mr. Feld have an opportunity to observe
24 you working with elephants when you first met him?

25 A. Most probably, yes. Yes, he saw the show,

1 yes.

2 Q. How many times have you met Mr. Feld?

3 A. Only that one time, this time.

4 Q. Only that time in 1998?

5 A. Before I worked, yes, and then after I met
6 him when I went over to America, when my daughter
7 Sarah started to work for him.

8 Q. When was that?

9 A. In 2000.

10 Q. So you met him in the year 2000?

11 A. Uh-huh.

12 Q. Okay. And where did you meet him in the
13 year 2000?

14 A. In Tampa, Florida.

15 Q. Is that the headquarters?

16 A. Yes.

17 Q. Have you met him at any other times?

18 A. No.

19 Q. Did he ever visit the Red Unit when you were
20 working on the Red Unit.

21 A. Yes, he did.

22 Q. How often did he visit the Red Unit?

23 A. I don't remember. He came about every
24 3 months maybe.

25 Q. And this would be every 3 months during the

1 6 years that you worked for the Red Unit?

2 A. Yes, about.

3 Q. And when he came to visit the Red Unit,
4 would he have had an opportunity to see how the
5 elephant handlers handled the elephants?

6 A. Yes, he walked around, always walked around,
7 yes.

8 Q. And would he have had an opportunity the see
9 the elephants on chains?

10 A. Maybe. I don't know. It depends what time
11 of the day he came.

12 Q. And did he have an opportunity to see you
13 handle the elephants when you worked on the Red Unit?

14 A. Yes.

15 Q. Did he have an opportunity to see Mr. Vargas
16 handle the elephants when Mr. Vargas worked on the
17 Red Unit?

18 A. Yes.

19 Q. Did he have an opportunity to see Jimmy
20 Strickland work with the elephants when Jimmy
21 Strickand --

22 A. Yes.

23 Q. -- worked on the Red Unit?

24 A. Yes.

25 Q. Did he have an opportunity to see Pista

1 handle the elephant on the Red Unit?

2 A. Yes.

3 Q. Did you ever see Mr. Feld visit the Red Unit
4 during a performance?

5 A. Yes.

6 Q. Did you see him, still at the Red Unit,
7 after the performance was over?

8 A. Yes.

9 Q. So he would have had an opportunity to see
10 the elephant on chains after the performance; is that
11 correct?

12 A. If he went to the barn, yes.

13 Q. Have you ever -- you said you had a
14 conversation I thought with Mr. Feld in which he said
15 you were always welcome to come back to the Circus;
16 is that correct?

17 A. Correct.

18 Q. When was that conversation?

19 A. Boston, at the end of the year party.

20 Q. Was that an in-person conversation?

21 A. Yes.

22 Q. So that was another time that you met
23 Mr. Feld; is that correct?

24 A. Yes.

25 Q. When was that?

1 A. November 2006.

2 Q. November 2006?

3 A. Or October; when we were in Boston, yes,
4 2006.

5 Q. And what did Mr. Feld say to you?

6 A. He thanked me for the work I did for him
7 over the years, and told me that I could -- I thanked
8 him too for giving me the work, that I enjoyed
9 working for him, and then he said to me I could come
10 back any time I wanted.

11 Q. And did Mr. Feld, during that conversation,
12 say anything about allegations that had been made
13 about your mistreating any of the animals on the Red
14 Unit?

15 A. No.

16 Q. Has Ms. Julie Strauss ever had any a
17 conversation with you about allegations that you have
18 mistreated animals on the Red Unit?

19 A. No.

20 Q. Do you know who Jim Antok is?

21 A. Yes.

22 Q. Who is he?

23 A. He was -- I do not know -- a man from the
24 direction.

25 Q. I am sorry?

1 while you worked at the Red Unit, you would talk to
2 Mr. Feld; is that correct?

3 A. Correct.

4 Q. And during the entire time that you worked
5 at the Red Unit, did Mr. Feld ever say anything to
6 you about allegations that you had mistreated any of
7 the animals on the Red Unit?

8 A. No.

9 Q. And did Nicole Feld, at any time during the
10 years 2000 to 2006, ever discuss with you at all
11 allegations that you had mistreated elephants on the
12 Red Unit?

13 A. No.

14 Q. And did Mr. Antok at any time during 2000
15 and 2006, while you were on the Red Unit, discuss
16 with you allegations that you had mistreated the
17 animals on the Red Unit?

18 A. No.

19 Q. Did Ms. Strauss ever have any discussions
20 with you during the time you were on the Red Unit
21 about allegations that you had mistreated any of the
22 animals on the Red Unit?

23 A. No, not that I recall.

24 Q. Did any official from Feld Entertainment at
25 any time during the years 2000 to November 2006 ever

1 discuss with you allegations that you had mistreated
2 any of the elephants on the Red Unit?

3 A. No, not that I recall.

4 Q. And you said you never mistreated animals on
5 the Red Unit; is that correct?

6 A. Correct.

7 Q. So if one of your superiors had a
8 conversation with you about allegations that you
9 mistreated the animals on the Red Unit you would
10 probably remember it; wouldn't you?

11 A. Sorry?

12 MS. JOINER: Objection. Calls for
13 speculation.

14 BY MS. MEYER:

15 Q. If one of your superiors had had a
16 conversation with you about allegations that you had
17 mistreated animals on the Red Unit, you probably
18 remember it; wouldn't you?

19 MS. JOINER: Objection. Calls for
20 speculation.

21 THE WITNESS: Maybe. It depends.

22 BY MS. MEYER:

23 Q. Why wouldn't you remember it?

24 A. It depends.

25 MS. JOINER: Objection. Calls for