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4700 River Road  
Riverdale, MD 20737

June 1, 1999

Ms. Julie Alexa Strauss  
Vice President and Corporate Counsel  
Feld Entertainment, Inc.  
8607 Westwood Center Drive  
Vienna, VA 22182

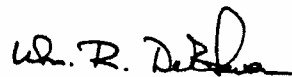
Dear Ms. Strauss:

As requested in your letter of May 27, 1999, this letter will serve as confirmation that an investigation of the Ringling Brothers-Barnum & Bailey Circus initiated in January 1999 has been closed administratively with no action. While not anticipated with this particular case, we can always re-open an investigation if additional pertinent information becomes available at a later date.

This agency does not issue press releases when cases are closed with no action, even in high profile situations. We do not intend to do so in this case, but we are certainly willing to confirm the fact that the case has been closed with members of the media or public who may wish to contact us regarding the status of the case.

As always, please feel free to contact me if I can be of further assistance.

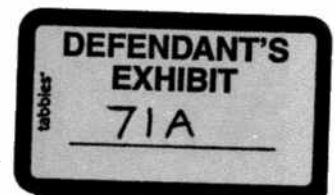
Sincerely,

  
W. Ron DeHaven  
Deputy Administrator  
Animal Care



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FELD 0029112



United States  
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Animal and  
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Animal Care

Eastern Region  
920 Main Campus Drive  
Suite 200  
Raleigh, NC 27606  
Telephone: (919) 716-5532  
Fax: (919) 716-5696

Julie Alexa Strauss  
Vice President/Corporate Counsel  
Feld Entertainment, Inc.  
8607 Westwood Center Drive  
Vienna, VA 22182

August 7, 2000

RE: IES Case Number: FL 99 028 AW

Dear Ms. Strauss:

The Animal Welfare Act investigation that was conducted into a whistle blower complaint of elephant abuse was recently completed. Inasmuch as no violations were documented, the matter is being closed and no further action is being taken at this time.

If you have any questions, please call the Eastern Regional Office at (919) 716-5532.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Goldentyer".

Elizabeth Goldentyer, D.V.M.  
Eastern Regional Director  
Animal Care

Cc:  
Facility File (52-C-0137)  
M. Binkley, SACS - ER  
R. DeHaven, AC Deputy Administrator



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Animal Care

Eastern Region  
920 Main Campus Drive  
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Raleigh, NC 27606  
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Fax: (919) 716-5696

Julie Alexa Strauss  
Vice President/Corporate Counsel  
Feld Entertainment, Inc.  
8607 Westwood Center Drive  
Vienna, VA 22182

August 21, 2000

RE: IES Case Number FL 99 028 AW

Dear Ms. Strauss:

The Animal Welfare Act investigation that was conducted into a whistle blower complaint of elephant abuse was recently completed. Inasmuch as no violations were documented the matter was closed on April 22, 1999. No further action is being taken with regard to this investigation.

The agency retains the option of reopening this case in the future if we obtain additional information that warrants further investigation.

If you have any questions, please call the Animal Care Eastern Regional Office at (919) 716-5532.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Goldentyer".

Elizabeth Goldentyer, DVM  
Eastern Regional Director  
Animal Care

Cc:  
Facility File (52-C-0137)  
M. Binkley, SACS-ER  
R. DeHaven, AC Deputy Administrator

FELD 0001417



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4700 River Road  
Riverdale, MD 20737

Ms. Julie Alexa Strauss  
Feld Entertainment, Inc.  
Ringling Bros/Barnum and Bailey  
8607 Westwood Center Drive  
Vienna, VA 22182

Dear Ms. Strauss:

The following Animal Welfare Act investigations conducted on your facility were closed:

• **Case Number: CA02005-AC**

On August 25, 2001, Humane Society of Santa Clara Investigators and a City of San Jose Police Officer witnessed an animal handler for Ringling Bros /Barnum and Bailey Circus lunge toward, and apparently strike a Feld-owned female Asian elephant with a bull hook or ankus.

Due to insufficient evidence the case was deemed no violation and closed March 13, 2002. The agency retains the option of reopening the case in the future if we obtain additional information that warrants further investigation.

• **Case Number: CA02009-AC and CA00136-AC**

**Abuse of Elephants:** From June 1997 through November 1999 a former Feld employee stated that he witnessed several beatings and the mishandling of elephants. In particular, on June 21, 1999, the elephant known as Nicole was removed from the traveling Blue Unit due to all the scars and swollen hook marks on her leg.

**Tuberculosis (TB) or Health Problems in the Elephants:** From 1990 to 1996 the attending veterinarian for Ringling Brothers circus suspected that the exhibiting elephants were infected with TB, and they continued to use them in the show.

In 1990 the attending Veterinarian for Ringling Brothers circus did not feel that the Ringling elephants could pass a TB test as required for a breeding contract, and requested assistance from Ringling Brothers' management in treating the elephants; no action was taken.

**Records:** September 2, 2000, the Blue Unit elephants and camels were inspected per a complaint. At this inspection it was determined that records of treatment for the animals injured were not being kept.



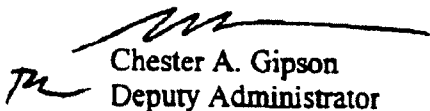
Ms. Strauss

2

March 17, 2000 CA00136 and March 20, 2000 CA02005 were deemed no violation and closed. The agency retains the option of reopening the cases in the future, if we obtain additional information that warrants further investigation.

If you have questions, please call me at (301) 734 4980.

Sincerely,

  
Chester A. Gipson  
Deputy Administrator  
Animal Care

cc: Betty Goldentyer

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United States  
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Animal and  
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Service

Animal Care

Eastern Region  
920 Main Campus Drive  
Suite 200  
Raleigh, NC 27608  
Telephone: (919) 716-5532  
Fax: (919) 716-5698

Julie Alexa Strauss  
Vice President/Corporate Counsel  
Feld Entertainment, Inc.  
8607 Westwood Center Drive  
Vienna, VA 22182

August 21, 2000

RE: IES Case Number TX 99 237 AW

Dear Ms. Strauss:

The Animal Welfare Act investigation that was conducted into the death of "Benjamin" was completed. Inasmuch as no violations were documented the matter was closed on November 24, 1999. No further action is being taken with regard to this investigation.

The agency retains the option of reopening this case in the future if we obtain additional information that warrants further investigation.

If you have any questions, please call the Animal Care Eastern Regional Office at (919) 716-5532.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Goldentyer".

Elizabeth Goldentyer, DVM  
Eastern Regional Director  
Animal Care

Cc:  
Facility File (52-C-0137)  
W. Christensen, RD, Central Region  
M. Binkley, SACS-ER  
R. DeHaven, AC Deputy Administrator



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Animal Care

Eastern Region  
920 Main Campus Drive  
Suite 200  
Raleigh, NC 27606  
Telephone: (919) 716-5532  
Fax: (919) 716-5696

Julie Alexa Strauss  
Vice President/Corporate Counsel  
Feld Entertainment, Inc.  
8607 Westwood Center Drive  
Vienna, VA 22182

August 7, 2000

RE: IES Case Number: TX 99 237 AW

Dear Ms. Strauss:

The Animal Welfare Act investigation that was conducted into the death of "Benjamin" was completed. Inasmuch as no violations were documented, the matter is being closed and no further action is being taken at this time.

If you have any questions, please call the Eastern Regional Office at (919) 716-5532.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Goldentyer".

Elizabeth Goldentyer, D.V.M.  
Eastern Regional Director  
Animal Care

Cc:

Facility File (52-C-0137)  
M. Binkley, SACS - ER  
W. Christensen, Central Regional Director  
R.. DeHaven, AC Deputy Administrator



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TOTAL P. 03



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4700 River Road  
Riverdale, MD 20737

July 15, 1998

Mr. Harris J. Weinstein  
Ms. Jeannie Perron  
Covington & Burling  
1201 Pennsylvania Avenue, NW.  
P.O. Box 7566  
Washington, D.C. 20044-7566

Dear Mr. Weinstein and Ms. Perron:

Subject: In re Feld Entertainment, Inc., dba Ringling Bros. & Barnum & Bailey Circus, AWA Docket No. 98-20

I am writing to allay your concerns expressed at numerous meetings with our attorneys about the media reports surrounding the death on January 24, 1998, of the juvenile Asian elephant known as "Kenny" and the complaint filed by the United States Department of Agriculture (USDA) in AWA Docket No. 98-20.

As you are aware, certain media reports stated incorrectly that USDA had charged Ringling Bros. and Barnum & Bailey Circus (Ringling Bros.) with a violation of the Animal Welfare Act that resulted in the death of "Kenny." Contrary to the published reports, the complaint filed in AWA Docket No. 98-20 did not allege that Ringling Bros. was responsible for or that its actions contributed to the death of "Kenny." Also, Ringling Bros. has never been adjudged to have violated the AWA or the Regulations and Standards issued thereunder.

I hope this letter addresses your concerns.

Sincerely,

W. Ron DeHaven  
Acting Deputy Administrator  
Animal Care



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United States  
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July 15, 1998

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4700 River Road  
Riverdale, MD 20737

Mr. Harris J. Weinstein  
Ms. Jeannie Perron  
Covington & Burling  
1201 Pennsylvania Avenue, NW.  
P.O. Box 7566  
Washington, D.C. 20044-7566

Dear Mr. Weinstein and Ms. Perron:

Subject: In re Feld Entertainment, Inc., dba Ringling Bros. & Barnum & Bailey  
Circus, AWA Docket No. 98-20

The purpose of this letter is to confirm discussions with our attorneys regarding the scope and effect of the consent decision which resolves AWA Docket No. 98-20.

The Animal Welfare Act is administered by the United States Department of Agriculture's Animal and Plant Health Inspection Service (APHIS). No other agency of the government is involved in the enforcement of the regulations and standards issued under the Act.

It is the intent of APHIS that the consent decision would subsume and resolve any and all allegations against your client, including those which could have been included in the complaint or an amended complaint, arising in connection with any event, act, or matter occurring on or prior to this date.

I appreciate your cooperation in the resolution of this matter.

Sincerely,

W. Ron DeHaven  
Acting Deputy Administrator  
Animal Care



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MAY 07 2002

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Eastern Regional  
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Animal Care

920 Main Campus Dr  
Suite 200  
Raleigh, NC 27606

(919) 716-5532

Julie Alexa Strauss  
Feld Entertainment, Inc.  
Ringling Bros/Barnum and Bailey  
8607 Westwood Center Drive  
Vienna, VA 22182

May 3, 2002

RE: IES Case Number CA 02  
009 and CA 00 136 AW

Dear Ms. Strauss:

The Animal Welfare Act investigations that were conducted on your facility regarding two incidents in California were closed on March 17, 2002. No violations were documented and no further action is being taken. The agency retains the option of reopening these cases in the future if we obtain additional information that warrants further investigation.

If you have any questions, please call me at (919) 716-5532.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Goldentyer".

Elizabeth Goldentyer  
Eastern Regional Director  
Animal Care

Cc:  
Facility File (S2-C-0137)



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FELD 0023985



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4700 River Road  
Riverdale, MD 20737

January 31, 2001

Dr. Jeannie Perron  
Covington and Burling  
1201 Pennsylvania Avenue, NW  
Washington, DC 20004-2401

Dear Dr. Perron:

Thank you for your letter of January 17, 2001, regarding the September 6, 2000, inspection of Ringling's Williston facility. In your letter you explain the reasons you feel that the citation of a noncompliant item under §2.40(b)(2) is inappropriate and request this citation be withdrawn.

We have carefully reviewed the information provided in your letter and during our meeting on January 10, 2001, with you and Dr. William Lindsay. Based on the assumption that the course of events outlined accurately reflects what happened, your request is reasonable. There appears to be a unique set of circumstances surrounding the initiation of treatment of "Tillie," the history and housing facilities on site, and the concerns regarding developing drug resistance in a herd known to be affected by *Mycobacterium tuberculosis*. By this letter we withdraw the citation under §2.40(b)(2) for failure to initiate tuberculosis treatment in Tillie. Given the circumstance unique to this situation, we no longer consider this to be a violation of the Animal Welfare Act or the implementing regulations.

We appreciate the time and effort you spent presenting your position on this matter, and believe this letter will bring the issue to a fair and equitable conclusion.

Sincerely,

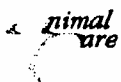
A handwritten signature in black ink, appearing to read "Wm. R. DeHaven".

Wm. Ron DeHaven  
Deputy Administrator  
Animal Care

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Animal Care  
Western Region

9580 Micron Avenue, Suite J  
Sacramento, CA 95827-2623  
Telephone: (916) 857-6205  
Fax: (916) 857-6212

Subject: IES Case Number CA01069 - AC

Date: April 5, 2001

To: Julie Alexa Strauss  
Vice President/Corporate Counsel  
Feld Entertainment, Inc.  
8607 Westwood Center Drive  
Vienna, VA 22182

The Animal Welfare Act investigation that was conducted on the Blue Unit of Ringling Brothers Barnum & Bailey Circus regarding handling violations which allegedly occurred in the San Francisco Bay area last fall has been completed. Inasmuch as no violations were documented, the matter is considered closed. The Agency retains the option of reopening this case in the future if we obtain additional information that warrants investigation. Please note that other investigations regarding Feld Entertainment, Inc. are still pending.

If you have any questions, feel free to contact me at the address or telephone number above.

A handwritten signature in cursive script that reads "Robert M. Gibbens".

Robert M. Gibbens, DVM  
Director, Western Region  
USDA, APHIS, AC

cc: D. Head  
B. Goldentyer



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JUL 27 2001

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4700 River Road  
Riverdale, MD 20737

CERTIFIED MAIL

July 23, 2001

Ms. Julie Alexa Strauss  
Feld Entertainment, Inc.  
Ringling Brothers Barnum and Bailey  
Circus  
8607 Westwood Center Drive  
Vienna, VA 22182

RE: IES Case Number FL 01 095 AW  
IES Case Number OH 00 018 AW

Dear Ms. Strauss:

The evaluation of two Animal Welfare Act (AWA) investigations involving Ringling Brothers Barnum and Bailey Circus have been completed. Both investigations have been closed administratively with no action, as explained below.

The investigation involving handling practices of two weaning elephants in 1999, confirmed that the action taken by Animal Care in response to these concerns, i.e., to cite a noncompliance as part of a routine inspection, was appropriate to the circumstances and no further action is indicted or necessary at this time.

Another investigation regarding allegations of misuse of an ankus has been closed due to insufficient evidence to support violations of the AWA or regulations.

The agency retains the option of reopening these cases in the future if we obtain additional information that warrants further investigation. If you have any questions or need further clarification, please call me at (301) 734-4890 or the Animal Care Eastern Regional Office at (919) 716-5532.

Sincerely,

W. Ron DeHaven  
Deputy Administrator  
Animal Care



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FELD 0002009



February 4, 2008

**United States  
Department of  
Agriculture**

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Services**

**Animal Care**

**920 Main Campus Drive  
Suite 200  
Raleigh, NC 27606**

**Tel No. 919-855-7100  
Fax No. 919-855-7123**

Thomas L. Albert  
Vice President  
Government Relations  
Feld Entertainment Inc.  
8607 Westwood Center Drive  
Vienna, VA 22182

Dear Mr. Albert:

This letter is to inform you that an investigation, conducted regarding allegations of inappropriate elephant handling in Tulsa, OK in 2007, has been officially closed due to a lack of evidence of any violation.

For your records, the case number is OK 07-015.

If you have any questions or concerns, please do not hesitate to contact our office at (919) 855-7100.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Goldentyer".

Elizabeth Goldentyer, DVM  
Eastern Regional Director  
Animal Care

Cc  
C. Gipson  
R. Gibbens

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