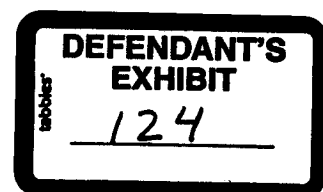




PLAINTIFFS' EXHIBIT MM
To Plaintiffs' Notice of Filing
Supplemental Affidavits In Support of Their
Opposition to Defendant's Motion for
Summary Judgment
Civ. No. 03-2006 (EGS/JMF)



DECLARATION OF ARCHELE FAYE HUNDLEY

I, Archele Faye Hundley, declare as follows:

1. I am currently 30-years-old and the mother of five children who range in age from 5 to 14. I worked for Ringling's red unit from approximately April 20, 2006, through June 27, 2006. I was part of the animal crew and primarily provided care to the horses and miniature horses. My duties included feeding, watering, cleaning, grooming, setting up the compounds, and escorting animals on the animal walk. Prior to joining Ringling, I worked for U.S. Security Associates for nearly four years as a sub-contractor. In that position, I was cleared by the federal government to provide security at a dam excavation project and also did part-time security at chemical companies and the post office.
2. I currently live in Sissonville, W.V., and my cell phone number is 304-590-3771. An alternative number for me is 252-339-1135.
3. During my employment at Ringling, I was never disciplined by Ringling and my only infraction was once being docked for oversleeping. I was complimented by co-workers and management for doing my job well. I reported to Sacha Houcke and Alex Vargas.
4. I quit the circus because the animal abuse was too upsetting. The abuse was not once in awhile, it occurred every day. Witnessing this abuse was a traumatic experience for me and left me a nervous wreck.
5. When I voiced concerns to management, including John Belfore, Jason Griggs, and Sacha Houcke about animal abuse, I was either ignored or told, "If you don't like it, pack your bags," and warned not to show affection towards the animals.

6. While we had a 2-week layover at the fairgrounds in Tulsa, Oklahoma, (between May 25 and June 6) three elephants got into a fight. Two of the elephants were Banana and Baby, and I believe the third one was Tonka. I observed Sacha Houcke as he tried to make the elephants lie on their bellies and put up their trunks. Baby was distressed and kept getting up and refused to lie down. Sacha smacked her with the bullhook repeatedly behind the ear and on the leg. He then hooked Baby behind the ear, holding the bullhook with both hands, and pulled with all of his body weight. Baby refused to go down. Sacha then inserted the bullhook into Baby's ear canal and holding the bullhook's handle with both hands, again pulled down with all of his weight. This incident lasted for approximately 30-45 minutes. Baby bled profusely from inside the ear and behind the earflap. She squealed in pain 3 or 4 times and let out a loud, shrill shriek.
7. I was present during the animal walk in Oklahoma City in 2006. As the animals were being walked from the arena to the train, I was holding a horse named Jonah. I observed Sacha Houcke intentionally bring two elephants, one named Luna and another named Tonka, just inches from a PETA staffer during the walk while the PETA staffer was standing on public property. I was towards the end of the line, approximately 30 feet away from Sacha. It was unusual to see Sacha break away from the line, and his movement off to the side got my attention. Sacha appeared to be arguing and raised his bullhook.
8. Sacha is known to have a violent temper. I have observed Sacha beating animals and threatening employees with physical violence.
9. About 60 to 90 minutes after the assault incident in Oklahoma City, I was on the circus bus (the circus bus transports employees from the animal stock cars to the

resident cars on the train, which can be several miles away), with other members of the animal crew. My co-workers talked about how Sacha had taken the elephants dangerously close to the PETA person; some employees laughed, others were outraged that Sacha would be so reckless.

10. While on the bus shortly after the incident, Sacha laughed about it, saying "If I would have socked the guy like I wanted to, I would have knocked him on his ass and he would not have been able to get back up."
11. Tonka and especially Luna, are considered dangerous, the other handlers won't go near Luna. Luna is unpredictable and acts up constantly. During the animal walks, a marksman with a rifle or tranquilizer gun travels behind the elephants in a white truck in case Luna rebels. Other animal handlers including Howard and Pista won't go near Luna. A handler named Antonio would warn circus personnel walking by "don't get close to the elephants, particularly Luna." They often keep Luna and Tonka away from the other elephants as much as possible because they are both dangerous and aggressive. Luna is said to have thrown things at people. I have seen Luna throw branches at people inside of the animal compound while eating.
12. A co-worker named David Holister had told me about an incident, prior to my employment, where Luna turned around in a threatening manner and grabbed him by the shirt and pulled him with her trunk as he placed a bucket under her to urinate. David requested transfer out of the elephant department back to the horses after that for fear of his personal safety.
13. I learned from Carcy Coleman, the vet tech, that Sacha was nearly fired by operations manager John Griggs following the assault incident in Oklahoma City.

I was told that Griggs observed the whole thing and was furious with Sacha for being so irresponsible.

14. I observed PETA staffers on the road quite a bit. I never saw PETA people do anything dangerous or anything to interfere with the operations of the circus. The PETA staffer remained calm during Sacha's assault in Oklahoma City. I was impressed by PETA's professionalism, and despite the efforts of some Ringling employees to antagonize PETA staffers, they never engaged the circus or allowed the harassment to bother them.
15. I have witnessed Sacha viciously whip the camels in the ring during practice.
16. In Tulsa, Oklahoma, this year, I observed Sacha punch a miniature horse named Gunther in the face twice with his fist with great force. The force he used would have knocked down a full grown man. The horse shrieked and was knocked senseless for about a minute. The thump of Gunther being slugged in the face by Sacha could be heard 20 feet away.
17. Garrison told me that he has seen Sacha beat animals. He described an incident where a horse named Mizean had cuts across the sides and back from being whipped by Sacha. He saw Baby, the elephant, beaten and bleeding from the bullhook in Tulsa and said the incident lasted about 45 minutes.
18. Garrison told me that the elephants scrape their backs when they are loaded on and off the trains because the opening in the boxcars is not large enough.
19. The animal crew is not allowed to carry cameras because Ringling does not want photos circulating of the elephants while they are chained in the boxcars and at arenas. The elephants are only unchained when the public is around. Whenever the public is not around, the elephants are chained up.

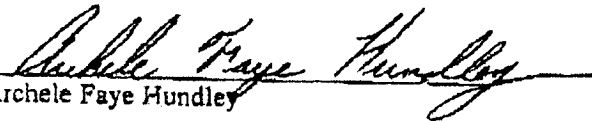
20. At most arenas, Ringling's elephant crew does not bother to put out the wood pallets to soften the area for the elephants to lie on. The elephants have sores from lying on concrete instead of wood.
21. When the vet tech, Carey Coleman was hired, she told me that she was upset because there were no medical records for the animals.
22. I was told by Carey that one of the elephants has a tear that goes from her vagina to anus. They do not clean the area frequently, as they are supposed to, in order to prevent infection.
23. I believe we were at the DCU Center when the USDA came out to videotape the elephants. Carey told me that she was instructed by John Belfore and Sacha Houcke to tell investigators that the lame elephant would be stiff after standing around. I heard Carey tell a USDA inspector that the stiffness works itself out and improves during the day in an elephant suffering from lameness. In fact, the opposite is true. This elephant gets worse on days when there are 2 and 3 performances.
24. Ringling always knew when the USDA was coming for inspections. The animal crew was instructed not to speak to USDA inspectors. In one case, Carey had told me that she had to cancel our lunch plans and stay at work later because they were expecting the USDA. The USDA came out twice while I was with the circus and never questioned members of the animal crew about how the animals are cared for.
25. I believe that Ringling pays the police in some cities because I have overheard Ringling employees discuss how expensive it is to hire police and complain that

the police were sometimes late, despite being paid by the circus, to provide escort for the animal walk to and from the train and arena.

26. Jimmy, an elephant handler, told me that he and another employee (a Russian handler who I believe was named Sea shank) were once attacked by an elephant while Jimmy was trying to hook them. The elephant tossed them and knocked them down, knocking the air out of them. The elephant was later taken off the road.
27. The circus regularly hires people with no animal care experience and provides little in the way of training. There is a high turnover in staffing for the animal crew.
28. I have observed Kelly Hook administer injections to horses and tigers, although he is not a trained veterinary technician.
29. While we were in Oklahoma City, I observed Mike hit a horse named Sonny 3 or 4 times with his fist, while walking Sonny from the show and in front of bystanders. Mike walked Sonny to the animal compound and continued to beat him, using the lead. Alex Vargas witnessed this and did not say or do anything to stop him. Members of the public, who saw the horse punched in the face complained to arena management who in turn told Ringling officials about it. Mike told me that he almost lost his job because he slugged the horse in front of witnesses. He said that Ringling management told him that if he needs to discipline animals, do it in the compound and not where there are witnesses.
30. Garrison told me he observed Mike beat the hell out of Sonny in Oklahoma City and that he got away with it.

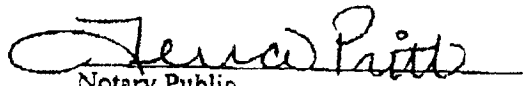
31. Most of Ringling's horses are head shy from being hit and punched in the face. If you go to pet one, they jerk their head away because they fear being hit.
32. I was told by Carey that she has been instructed by Sacha to put records in the personnel files of an employee named Bob Tom, who left the circus in early August 2006 that falsely claimed he was abusive or neglectful towards animals because they feared he was contacting PETA to report abuse. Bob Tom was fired for complaining about mistreatment. They fabricate employee records so they can be used to discredit former employees who report abuse. Carey told me they falsified personnel records on other employees, including Dave, when they quit or are fired after complaining about animal abuse.
33. I have never observed Bob Tom abuse or neglect animals. I was told by Garrison and Kenny that they never observed Bob Tom abuse or neglect animals and both were aware that the circus manufactured allegations in case they needed to discredit him for contacting PETA.
34. I was told by Howard that an elephant named Banana has arthritis and they have not been giving her medication.
35. George, an animal handler, told me that an elephant named Congo attacked him years ago when the circus was in Knoxville and that Congo is no longer alive.
36. George described to me how, if a horse becomes unruly, he grabs the horse by the throat and shoves him back and also grabs their lip and twists.
37. Garrison told me that the circus claims to audiences that the animals are trained with voice commands and the whip is simply used as an extension of the arm, when in fact he has observed trainers use the whip to beat animals during practice.

38. In Lexington, KY, I observed George jab a horse in the face with a pitchfork when the horse stuck his nose into the muck bucket (trash can for manure). The horse jerked his head back. I then saw George grab the horse by the throat and push the horse backwards.
39. It was a 3-day train ride when we traveled by train from Worcester, Mass., to Tulsa, Okla. The elephants and horses were only let out once for exercise during the trip. There was such an accumulation of elephant feces that it took two dump trucks to remove all the waste from their boxcars.
40. The boxcars are poorly ventilated. The stench from urine and feces is overwhelming and makes your eyes water and your nose burn.


Archele Faye Hundley

City of Chas, to-wit:

Subscribed and sworn to before me this 19 day of September, 2006, by Archele Faye Hundley.


Notary Public

