

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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

Plaintiffs,

v

FELD ENTERTAINMENT, INC.,

Defendant.

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) Case No: 03-2006  
) (EGS/JMF)  
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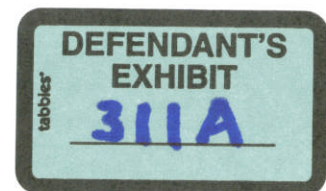
Videotaped Deposition of

Sacha Houcke

taken on

Monday, January 7, 2008

**CERTIFIED COPY**



Reported by: Paul Brincau, MBIVR, ACR

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

**APPEARANCES:**

For the Plaintiffs:  
(Present via videoconference)

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**ALSO PRESENT:**

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

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 A. No.

2 Q. Have you ever worked with an elephant named  
3 Nicole?

4 A. No.

5 Q. Have you ever worked with an elephant named  
6 Misor?

7 A. No.

8 Q. Have you ever worked with an elephant named  
9 Susan?

10 A. No.

11 Q. Have you ever worked with an elephant named  
12 Jewel?

13 A. No.

14 Q. Have you ever worked with an elephant named  
15 Lucy?

16 A. No.

17 Q. And have you ever worked with an elephant  
18 named Zina?

19 A. No.

20 Q. How long have you been working with  
21 elephants generally, how many years?

22 A. Nearly over 30 years.

23 Q. Do you have any licences with regard to  
24 animal handling?

25 A. Yes, I took a licence in England in 1977.

1 And now in France it is obligated, if you show  
2 animals, to have a licence, and I just took it  
3 6 months ago.

4 Q. What is the difference between elephant  
5 handlers and elephant trainers?

6 A. The trainer of the elephant teach the  
7 elephants, and the handler is the people who helps.

8 Q. And while you were at Ringling Brothers did  
9 you do both handling and training of the elephants?

10 A. I did the training and handling, yes.

11 Q. Which elephants were on the Red Unit while  
12 you worked there?

13 A. Asia, Donca, Luna, Baby, Assam, Banana,  
14 Sarah, Toby, Banco, Siam.

15 Q. Do elephants vocalize?

16 A. Yes, they do, sometimes.

17 Q. And why do they do that?

18 A. When they speak between each other. And  
19 then if they are happy and they want to play. And  
20 then if they know somebody and you talk to them, they  
21 will talk back to you.

22 Q. What kind of behavior does an elephant  
23 exhibit if it is happy?

24 MS. MEYER: Objection to form.

25 ///

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 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           A.    No, not that I remember.

2           Q.    You worked for Mr. Gaipo for 5 years; is  
3   that correct?

4           A.    Yes.

5           Q.    And what was your title when you worked for  
6   Mr. Gaipo?

7           A.    Director of Animal Care and Trainer and  
8   Presenter.

9           Q.    Is it correct to say that you were the head  
10   of care of elephants during the time your worked for  
11   Mr. Gaipo?

12          A.    Yes, elephants and horses and exotics.

13          Q.    But Mr. Gaipo did not come to you and tell  
14   you that he was leaving the Red Unit when he left?

15          A.    No.

16          Q.    Is that correct?

17          A.    Yes, it is correct.

18          Q.    Do you remain on good terms with Feld  
19   Entertainment even though you are not employed there  
20   anymore?

21          A.    Yes, I think so.

22          Q.    If you wanted to return to work there, do  
23   you think you have an opportunity to secure  
24   employment there?

25          A.    Maybe. I do not know yet. It is a good

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 trailer, and the 2 last years I travelled with the  
2 train.

3 Q. Did you ever have an opportunity to see how  
4 the elephants on the Blue Unit are maintained on the  
5 trains when they travel from city to city?

6 A. No, I never went to see it.

7 Q. And it is true that the elephants are  
8 chained on the train as soon as they are loaded onto  
9 the train; is that correct?

10 A. It is correct, and the reason why they are  
11 chained --

12 Q. Excuse me, there is no question pending. I  
13 did not ask you the reason.

14 MS. JOINER: You are interrupting his  
15 answer.

16 MS. MEYER: I only asked him one question  
17 and --

18 MS. JOINER: He is answering that question  
19 and you cut him off.

20 BY MS. MEYER:

21 Q. Okay, I will repeat the question. The  
22 question was, the elephants are chained as soon as  
23 they are loaded on the train; is that correct?

24 A. It is correct. And the reason why they are  
25 chained is like a safety belt, that they stay in

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. And if Mr. Vargas testified that you made  
2 the elephants at this time hold the position of being  
3 down on the four legs and trunks held up for 5-to-10  
4 minutes, would that be incorrect testimony?

5 MS. JOINER: Objection to form.  
6 Argumentative. Misstates the testimony.

7 THE WITNESS: That was a bit long. Maybe  
8 5-minutes maximum.

9 BY MS. MEYER:

10 Q. Okay. You said 30 seconds before --

11 A. No, you asked me the leg up and the trunk  
12 up, not laying down. You asked me before to put  
13 their leg up and the trunk up, not laying down with  
14 the trunk up.

15 Q. Did you make the elephants put their trunk  
16 up when they were laying down on all four legs?

17 A. Yes.

18 Q. How long did you make the elephants Baby and  
19 Banco hold position of lying down on all four legs  
20 with their trunks up in the air?

21 A. About 5 minutes.

22 Q. Okay. Could it have been as long as 10  
23 minutes?

24 A. I don't remember, but I do not think so.

25 Q. You don't remember?

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           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 Q. While you worked at the Red Unit,  
2 Mr. Houcke, did you ever bop an elephant with a  
3 bullhook?

4 A. No.

5 Q. Did you ever whack an elephant with a  
6 bullhook?

7 A. No.

8 Q. Did you ever grab the skin of an elephant  
9 behind its ear with a hook end of the bullhook and  
10 pull the elephant towards you?

11 A. No.

12 Q. You never did that?

13 A. I just touched them towards me, but not  
14 behind the ear. If I did something like that it  
15 would be under the chin, or I take the guide, I put  
16 it under the chin and pull the elephant to me.

17 Q. And you would put the hook and the bullhook  
18 in the skin of the elephant under the chin?

19 A. Not in the skin.

20 Q. I am sorry?

21 A. Not in the skin. It goes around. It  
22 doesn't go into the skin.

23 Q. What end of the bullhook would you use to  
24 bring the elephant towards you, under his chin?

25 A. I would use the bent side to pull it to me.



1 Q. The hooked end of the bullhook?

2 A. Yes.

3 Q. Why did you use the hooked end of the  
4 bullhook?

5 A. I use the guide because it's like a line on  
6 the dog. If the elephant sees the line, then he  
7 comes to me, I am holding on the line.

8 Q. There is no hooked end on the line for a  
9 dog, is there?

10 A. Yes, but some dogs, they have this collar  
11 that you pull on it and it chokes them; it does not  
12 matter.

13 Q. But I am asking you why you use the hooked  
14 end as opposed to the other end of the bullhook if  
15 you did not hook the skin of the elephants?

16 A. If I had done badly, I would have wounded  
17 the elephant; but he was not wounded.

18 Q. Have you ever seen any handler at the Red  
19 Unit hit an elephant with a bullhook?

20 A. No.

21 Q. Have you ever seen any handler of the Red  
22 Unit bop an elephant with a bullhook?

23 A. No, they were not allowed. We would not  
24 allow it.

25 Q. If you had seen a handler at the Red Unit

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 Q. There wouldn't be a show every single day,  
2 was there, when you worked on the Red Unit?

3 A. Nearly every day.

4 Q. There were some days when there was no show;  
5 is that correct?

6 A. Correct.

7 Q. On the day when there was no show, when  
8 would the elephant be chained for the night?

9 A. Yes, every day they were chained up for the  
10 night.

11 Q. What time would that be, on a day when there  
12 was no show, what time were they chained?

13 A. At night around 9/10 -- 9 o'clock/10 o'clock  
14 at night until the next morning.

15 Q. And you said that they were on chains when  
16 they were being bathed in the morning; is that  
17 correct?

18 A. Yes.

19 Q. And Mr. Gaipo, when he was the unit, General  
20 Manager for the Red Unit would have had an  
21 opportunity when he worked during 2000 to 2005 to see  
22 the elephants on chains when they were being bathed;  
23 is that correct.

24 A. Yes.

25 Q. And he would have had an opportunity to see

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 Strickland --

22 A. Yes.

23 Q. -- worked on the Red Unit?

24 A. Yes.

25 Q. Did he have an opportunity to see Pista

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 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