



NO.	TOPIC	RIDER'S TESTIMONY	IMPEACHMENT	RECORD CITATION
1	The reason Rider left CBBB	Rider previously testified that he quit CBBB because of the beating an elephant named "Pete"	Rider testified in his 2007 deposition that he decided to quit CBBB after speaking with Kenneth Feld in Woodbridge, Virginia, which was several days, if not a week, before the beating of the elephant named "Pete"	2-12-09 p.m. at 16:21-19:14; <i>id.</i> at 23:25-24:17; DX 38
2	Rider's military service	Rider testified at trial that he held the rank of "Specialist 4," and indicated the same on his FEI employment application (DX 38)	Rider testified in his 2007 deposition that he never actually "received" the rank of Specialist 4 <sup>th</sup> class; Rider reenlisted in the Army and was made a Specialist 4 <sup>th</sup> class, but returned late from leave and was demoted to Private First Class, so he "never held the rank"	2-12-09 p.m. at 21:6-23:3; DX 38
3	Rider's representation on his employment application regarding the number of years he attend high school	Rider testified at trial that he completed four year of high school at Washington High School, and indicated the same on his FEI employment application (DX 38)	Rider admitted that he dropped out of high school in the tenth grade and later received a G.E.D., and that he did not go to Washington High School for four years	2-12-09 p.m. at 23:4-24; DX 38

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4	Whether Rider was equally emotionally attached to all of the Blue Unit elephants	Rider testified at trial that he was equally attached to all elephants on the Blue Unit, including the "English" elephants that were owned by Richard Chipperfield	<p>Rider later admitted that he "was closer to the Chipperfield elephants;"</p> <p>Rider testified in his 2007 deposition that the "was really attached to" the Chipperfield elephants, and stated the same in a speech in Carbondale, Illinois in 2002;</p> <p>Rider made a videotape in which he referred to the elephant Karen as a "bitch"</p>	<p>2-12-09 p.m. at 25:2-22; <i>id.</i> at 50:23-53:15;</p> <p>2-17-09 p.m. (12:50) at 55:1-56:20; DX 30B</p>
5	Whether Rider had a conversation with an FEI veterinarian, Dr. West, regarding the elephant Susan	Rider testified at trial that he did not have a private or personal conversation with Dr. West regarding Susan's health	Rider's 2004 response to Interrogatory No. 11 indicated that he requested that Dr. West and Graham Chipperfield come back to the unit to further examine Susan's health	2-12-09 p.m. at 31:3-33:5
6	Whether Rider considered approaching Kenneth Feld regarding his concerns about the treatment of the elephants	Rider testified at trial that it never occurred to him to approach Kenneth Feld when Mr. Feld was visiting the Blue Unit to voice his [Rider's] concerns about the treatment of the elephants	Rider testified in his March 2000 PAWS "deposition" that one time when Kenneth Feld came to the Blue Unit he [Rider] "wanted to say 'Do you want to come and see your elephants?'"	<p>2-12-09 p.m. at 34:10-36:11;</p> <p>PWC 184 at 84:7-85:4</p>

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7	Whether Rider's feeding of the elephant Karen before she was watered was considered to be insubordinate conduct	Rider testified at trial that he did not receive a written reprimand for insubordinate conduct for feeding the elephant Karen before she had been watered	Rider testified in his 2006 deposition that he received a written reprimand for insubordinate conduct for the Karen feeding incident (DX 41)	2-12-09 p.m. at 40:22-41:9; <i>id.</i> at 41:24-43:2; DX 41
8	The reason(s) for Rider's write-ups	Rider testified before the Nebraska Legislature that he had been written-up three times for complaining about animal abuse, and affirmed the same at trial	Rider received write-ups for missing one day of work, insubordination, and drunken and disorderly behavior (DX 40-42)	2-12-09 p.m. at 43:24-45:6; DX 40-42
9	The reason Rider left the job with Daniel Raffo in Europe	Rider testified on direct examination at trial that he left the job with Mr. Raffo in Europe because of the euthanization of two tigers	Rider's 2004 answer to Interrogatory No. 2 indicated that he quit the job with Mr. Raffo in Europe "because of the way Raffo and others who worked for the Chipperfields continued to mistreat the elephants"	2-12-09 p.m. at 53:19-54:22
10	How Mr. Rider traveled to former lead plaintiff PAWS in Galt, California after returning to the United States from London	Rider testified at trial that he traveled by Greyhound bus	Rider's 2007 answer to Interrogatory No. 13 indicates that PAWS paid for an airline ticket for Rider to travel to Galt, California (which Rider disavowed at trial)	2-12-09 p.m. at 60:4-62:17 (Rider)

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11	The filing of Rider's tax returns	Rider testified at trial that he went to a tax lawyer and that <i>he</i> told that lawyer that he needed to file back taxes ("He didn't say file. I said I need to file my taxes when I realized that you don't - you have to pay taxes on grants.")	Rider testified at his 2007 deposition that he consulted with a tax lawyer, and that <i>the tax lawyer told him</i> to file his taxes ("So I consulted with a tax attorney who said, yes, file.")	2-12-09 p.m. at 95:2-23
12	Whether Rider gave the elephants commands off of the chains while employed at FEI	Rider testified at trial that "sometimes" when the elephants were off the chains he would give them commands	Rider testified at his 2007 deposition that he never handled elephants by himself at Ringling Bros. off the chains	2-12-09 p.m. at 98:10-22
13	How many times Rider handled a bullhook	Rider testified before the Connecticut legislature that that hearing was only the second time in his life that he had held a bullhook, and affirmed that testimony at trial	Rider admitted at trial that he used a bullhook when he worked for Mr. Raffo in Europe, and a picture of Mr. Rider, DX 32 at 2, shows Mr. Rider using a bullhook on the elephant Meena on the docks in South Carolina	2-12-09 p.m. at 100:16-104:13; DX 32
14	Whether verbal commands were given before the bullhook was used	At trial, Rider denied that handlers would use voice commands before using the bullhook	Rider testified at his 2006 deposition that handlers would use the bull hook after an elephant failed to respond to a verbal command	2-12-09 p.m. at 109:11-110:10

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15	Whether it is appropriate for a bullhook to be used when an elephant does not respond to a verbal command and whether it is appropriate to use a bullhook as long as it does not cause the elephant physical pain	At trial, Rider denied that it was appropriate to use a bullhook after an elephant does not respond to a verbal command and denied that he thinks that a bullhook can be used on an elephant as long as it does not cause the elephant physical pain	Rider testified at his 2006 deposition that it is appropriate to use a bullhook after an elephant does not respond to a verbal command and that a bullhook can be used on elephant as long as it does not cause the elephant physical pain	2-12-09 p.m. at 110:11-112:5
16	Whether the elephant Zina had hook marks on her on more than one occasion	Rider testified at trial that there were hook marks on Zina after an alleged incident in Richmond, Virginia and that he treated those marks with Wonder Dust; Rider testified that this was not the only time that Zina had marks on her	Rider stated in a June 28, 2000 interview that Zina was one of three elephants (Jewel, Zina and Mysore) that FEI showed to the USDA because she did not have hook marks on her	2-12-09 p.m. at 117:7-119:1
17	Whether the six elephants at issue and Zina had scars behind their ears	Rider testified that some of those elephants had scars behind their ears	Rider testified at his 2007 deposition that none of the six elephants at issue and Zina had scars behind their ears	2-12-09 p.m. at 119:16-120:18

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18	Whether Rider does "media" work for a "living"	At trial, Rider denied that does media and outreach "work" for a living	When asked "what do you do for a living" in his 2007 deposition, Rider testified that he "goes around the country speaking to the media, and to legislative branches of government, and states ... about what [he] witnessed at Ringling"	2-17-09 p.m. (12:50) at 5:25-6:12
19	Whether Rider kept documentation of the number of miles that he traveled in his Volkswagen van	Rider testified at trial that he has traveled more than 380,000 miles in his van and that he kept track of the mileage, which he claimed as a tax deduction, by relying on his odometer; Rider also testified that he had records to support his mileage deduction	Rider admitted that his odometer was broke at the time of his 2007 deposition and that he has no documents supporting the amount of the mileage deduction taken on his income tax returns	2-17-09 p.m. (12:50) at 12:5-13:15
20	Whether Rider has refrained from visiting or observing the six elephants at issue and Zina	Rider testified at trial that statements made in briefs filed with this Court and the Court of Appeals that he was refraining from visiting and working with the elephants to avoid further aesthetic and emotional injury were true when filed and were still true at the time of trial	Since returning to the United States, Rider testified that he has voluntarily observed the Blue Unit elephants on many occasions (at least 10-15 times per year since November 1999); Rider described those observations in his answer to Interrogatory No. 17	2-17-09 p.m. (12:50) at 18:8-24:7; DX 16

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21	How many hours per day the elephants are chained	Rider testified on direct examination that the elephants are chained essentially all of the time except for about one minute before the show and 30-40 minutes while they were in the show	<p>The 9-26-03 complaint alleges that the elephants were chained up to 20 hours per day;</p> <p>Rider testified in his 2006 deposition that the elephants were chained between 22 ½-23 hours per day;</p> <p>Rider testified in his March 2000 PAWS deposition that the elephants are chained all but 13 minutes per day;</p> <p>Rider testified to the Chicago city counsel in February 2006 that the elephants are chained 24 hours per day</p>	2-17-09 p.m. (12:50) at 31:2-33:8
22	Whether elephants should ever be chained	Rider testified at trial that elephants should "never [be chained], except for veterinarian care"	Rider testified at his 2006 deposition that there are <i>no</i> circumstances in which an elephant should be chained	2-17-09 p.m. at 48:21-49:19
23	Whether Rider ever touched the elephant Karen	Rider testified at trial that he recalled "one time when [he] was taken up and touched Karen"	Rider testified in his March 2000 PAWS "deposition" that unlike the rest of the FEI elephants he "never physically put [his] hand" on Karen because "she [Karen] just didn't like me [Rider]"	2-17-09 p.m. (12:50) at 59:1-60:2 (Rider); PWC 184 at 102:1-8



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24	Whether the USDA communicated the results of its investigation to Rider	Rider testified in his 2006 deposition that he never received a response from the USDA regarding the outcome of their investigation	In a lecture in Carbondale, Illinois, Rider stated that the USDA did follow-up with him and told him that FEI had done nothing wrong	2-17-09 p.m. (12:50) at 76:4-16 (Rider)
25	Whether Rider was told that he could not be fired for complaining about elephant abuse	At trial, Rider denied that he was told by the union that he could not be fired for complaining about elephant abuse	Rider stated in a radio interview in August 2004 that he was told by the union that he could not be fired for complaining about the treatment of the elephants	2-17-09 p.m. (2:48) at 71:9-72:16 (Rider)
26	The cause of marks on the elephants in Boston, Massachusetts	Rider testified that in Boston, Massachusetts, Jeff Steele was upset because there were hook marks on the elephants and there was "a lot of hooking going on"	Rider testified in his March 2000 PAWS "deposition" that Jeff Steele got upset because the elephants had marks on them after the elephants head-butted each other ("When you see the big cuts, those are just from head butting. That's not a hook.")	2-12-09 p.m. at 29:18-30:9 (Rider); 2-17-09 p.m. (2:48) at 13:25-15:10, <i>id.</i> at 72:17-73:7; PWC 184 at 66:9-68:4