

# EXHIBIT 24

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE DISTRICT OF COLUMBIA

3   - - - - - X

4   AMERICAN SOCIETY FOR THE       :

5   PREVENTION OF CRUELTY TO       :

6   ANIMALS, et al.,               :

7                   Plaintiffs,       :

8               V.                       :   Case No. 03-2006 (EGS)

9   RINGLING BROS. AND BARNUM &   :

10   BAILEY CIRCUS, et al.,       :

11                   Defendants.       :

12   - - - - - X

13                                       Washington, D.C.

14                                       Tuesday, July 19, 2005

15               Videotaped deposition of LISA WEISBERG, a  
16   witness herein, called for examination by counsel for  
17   Defendants in the above-entitled matter, pursuant to  
18   notice, the witness being duly sworn by MARY GRACE  
19   CASTLEBERRY, a Notary Public in and for the District  
20   of Columbia, taken at the offices of Covington &  
21   Burling, 1201 Pennsylvania Avenue, N.W., Washington,  
22   D.C., at 9:40 a.m., Tuesday, July 19, 2005, and the  
23   proceedings being taken down by Stenotype by MARY  
24   GRACE CASTLEBERRY, RPR, and transcribed under her  
25   direction.

**Certified Copy**

1 longer own any of its elephants?

2 A. Not necessarily.

3 Q. Are you asking that the elephants no  
4 longer perform in the circus?

5 A. Yes.

6 Q. Is the ASPCA receiving any funding for  
7 this lawsuit from groups that are not parties to this  
8 case?

9 A. Not specifically.

10 Q. How much money does the ASPCA spend each  
11 year gathering information about Ringling Bros.?

12 A. Well, currently, none.

13 Q. In the past, have you?

14 A. Yes.

15 Q. And in what years?

16 A. 19 -- sorry, 2002 and 2003.

17 Q. Let's start with 2002. How much money did  
18 you spend that year gathering information about  
19 Ringling Bros. approximately?

20 A. Approximately \$18,000.

21 Q. And what was that money spent on?

22 A. It was spent on Tom Rider's speaking with  
23 the media across the country and gathering additional  
24 information about the treatment of the elephants by  
25 Ringling Bros.

1 Q. When you say gathering additional  
2 information about the treatment of elephants by  
3 Ringling Bros., what do you mean?

4 A. Well, he would try to see the elephants,  
5 he would note their despondent state, their  
6 performance of unnatural acts and basically do public  
7 education, testify at hearings in support of  
8 legislation to ban exotic animals in traveling acts.

9 Q. So besides -- I'm sorry, excluding Tom  
10 Rider's efforts to gather additional information  
11 about the treatment of elephants by Ringling Bros.,  
12 did the ASPCA spend any money or any -- let's start  
13 with any time trying to gather information about the  
14 treatment of elephants by Ringling Bros.?

15 A. Yes. We made various Freedom of  
16 Information requests to USDA for documents that we  
17 believed we were entitled to, filed by USDA  
18 inspectors citing Ringling Bros.' violation of the  
19 Animal Welfare Act.

20 Q. Do you pay any people to gather  
21 information regarding Ringling Bros.?

22 A. No.

23 Q. Has it ever paid anybody at Ringling Bros.  
24 for information about the circus?

25 A. No.

1 Q. Moving along to 2003, how much money  
2 approximately did the ASPCA spend that year gathering  
3 information about Ringling Bros.?

4 A. \$22,000.

5 Q. And what was that money spent on?

6 A. Again, it was to support Tom Rider in his  
7 public outreach efforts and in speaking with the  
8 media about the various violations engaged in by  
9 Ringling Bros.

10 Q. And in addition to providing Tom Rider  
11 with financial support, did the ASPCA spend any other  
12 time or money gathering information about Ringling  
13 Bros. during 2003?

14 A. There may have been some further attempts  
15 to obtain documents from the USDA on Ringling  
16 Bros. -- I'm sorry, USDA inspectors citing Ringling  
17 Bros. for violating the Animal Welfare Act.

18 Q. And in 2003, you didn't pay anybody else  
19 to gather information about Ringling Bros.?

20 A. No.

21 MS. DALTON: I would like to mark Exhibit  
22 Number 4.

23 (ASPCA Exhibit No. 4 was  
24 marked for identification.)

25 BY MS. DALTON:

1 were compensated through this check request?

2 A. I don't believe so.

3 Q. Were any of the services provided in this  
4 media support provided by Tom Rider?

5 A. Yes.

6 Q. And what did Tom Rider do in regards to  
7 this media support?

8 A. He would meet with various reporters and  
9 media channels to discuss his experience with  
10 Ringling Bros. and the training of the elephants.

11 Q. Do you know if any of the funds provided  
12 in this check went to Mr. Rider as compensation for  
13 those efforts?

14 A. Some of the copies of the report may have  
15 been given to Mr. Rider to accompany his visits to  
16 the media.

17 Q. But that's the only type of compensation  
18 that was provided to Mr. Rider through this?

19 A. Correct.

20 Q. Do you know who at Meyer Glitzenstein  
21 provided this media support?

22 A. I believe it was Darcy Kemitz at the time.

23 Q. And who is Ms. Kemitz?

24 A. She used to work for the Wildlife Advocacy  
25 Project at Meyer Glitzenstein.

1 Q. What is the Wildlife Advocacy Project?

2 A. It's a 501(c)(3) organization.

3 Q. And is it associated with Meyer &  
4 Glitzenstein?

5 A. Yes.

6 Q. How so?

7 A. It is a -- I'm not sure I can fully answer  
8 that.

9 Q. Just whatever you know about it.

10 A. My understanding is it is an organization  
11 that was created by Meyer & Glitzenstein to advocate  
12 for the humane treatment of wildlife and preservation  
13 of habitat.

14 MS. DALTON: I would like to mark Exhibit  
15 Number 7.

16 (ASPCA Exhibit No. 7 was  
17 marked for identification.)

18 BY MS. DALTON:

19 Q. And this is another check request for  
20 Meyer & Glitzenstein dated April 4th, 2002, correct?

21 A. Correct.

22 Q. And it was requested by you?

23 A. Yes.

24 Q. And the reason given for the reimbursement  
25 is -- it says, "Reimbursement for money given to Tom

1 Rider exceeding the \$6,000 grant to the Wildlife  
2 Advocacy Project for first quarter 2002."

3 A. Correct.

4 Q. And I can't really read this writing in  
5 the parenthetical. It looks as though it says 400 of  
6 this, and I don't know if you can help me out with  
7 the end of that.

8 A. Covers zoom camera, charge to capital  
9 budget with a question mark.

10 Q. Okay, thank you. And you said that the  
11 Wildlife Advocacy Project was an organization that  
12 was created by Meyer Glitzenstein to advocate the  
13 humane treatment of wildlife and preservation of  
14 habitat?

15 A. That's correct.

16 Q. Can you tell me a little bit more about  
17 what the Wildlife Advocacy Project does in more  
18 concrete terms?

19 A. I can't.

20 Q. Do you know if certain people at Meyer  
21 Glitzenstein are involved in the Wildlife Advocacy  
22 Project?

23 A. Yes.

24 Q. And who is involved in the Wildlife  
25 Advocacy Project?



1 A. I believe it's Kathy Meyer and Eric  
2 Glitzenstein.

3 Q. What is the ASPCA's role in the Wildlife  
4 Advocacy Project?

5 A. We provided a grant to them to enable Tom  
6 Rider to do his public outreach and education about  
7 the treatment by Ringling Bros. of its Asian  
8 elephants.

9 Q. And that was what the -- I'm sorry, the  
10 \$6,000 referred to in the check request was this  
11 original grant, correct?

12 A. Correct.

13 Q. And the check request for \$526.16 is  
14 additional funding over the original allotment in the  
15 budget for this project?

16 A. Correct.

17 Q. And \$400 of this was for a zoom camera?

18 A. Correct.

19 Q. Was the zoom camera to be used by  
20 Mr. Rider?

21 A. Yes.

22 Q. And for what purpose was the zoom camera  
23 to be used by him?

24 A. To gather additional information about the  
25 treatment and chaining of the elephants by Ringling

1 Bros.

2 Q. What other activities were covered in the  
3 \$6,000 grant?

4 A. They were to reimburse Tom Rider for his  
5 general living expenses to travel the country and  
6 meet with the media.

7 Q. Did you have any direct -- did you provide  
8 Mr. Rider with any direct payments or were all of  
9 your -- that's my question. Did you provide him with  
10 any direct payments?

11 A. Yes, in 2003, I believe.

12 Q. Did you provide that check request to us?

13 A. I believe I did.

14 MS. DALTON: I don't recall that, so Kim,  
15 if we could perhaps discuss that. We didn't receive  
16 any check request for Mr. Rider specifically.

17 THE WITNESS: Well, they weren't to  
18 Mr. Rider, the check requests. We would either  
19 advance money to him to purchase a Greyhound bus  
20 ticket or to reimburse him for his daily living  
21 expenses or I would prepay his hotel rooms. So there  
22 was never any checks written to Mr. Rider.

23 BY MS. DALTON:

24 Q. So there aren't any documents that would  
25 reflect any of those purchases or any of those

1 monetary advances?

2 A. The hotel rooms were oftentimes put on my  
3 American Express corporate card, and then some of the  
4 other smaller items were reimbursed to him through  
5 petty cash.

6 Q. And those were all in 2003?

7 A. Correct.

8 Q. Can you think of any other direct payments  
9 or in-kind reimbursements to Mr. Rider for any of the  
10 years besides 2003?

11 A. No.

12 Q. Returning to Exhibit 7. So if you could  
13 tell me -- if you could go into more detail as to  
14 what the \$6,000 grant was originally for.

15 A. Again, it was to reimburse Mr. Rider for  
16 his Greyhound bus tickets, to travel the country,  
17 basic day-to-day living expenses, food, lodging.

18 Q. And this was all provided through the  
19 Wildlife Advocacy Project?

20 A. Correct.

21 Q. Did Mr. Rider know that the ASPCA was  
22 providing this funding through the Wildlife Advocacy  
23 Project?

24 A. I believe so.

25 Q. Did Mr. Rider, to your knowledge, receive

1 any additional funds for his participation in this  
2 project from other plaintiffs?

3 A. I can't answer that.

4 Q. You don't know?

5 A. I don't recall.

6 MS. DALTON: I would like to mark Exhibit  
7 8.

8 (ASPCA Exhibit No. 8 was  
9 marked for identification.)

10 BY MS. DALTON:

11 Q. And this is another check request  
12 requested by you for the check made payable to Meyer  
13 & Glitzenstein for, quote, "Tom Rider testimony at  
14 Mass. legislative hearing on anticircus bill,"  
15 correct?

16 A. Correct.

17 Q. And this was dated May 23rd, 2003,  
18 correct?

19 A. Correct.

20 Q. Why did the ASPCA reimburse Mr. Rider for  
21 this testimony?

22 A. That covered his transportation and hotel  
23 costs to get to Massachusetts, to get to Boston to  
24 testify at the hearing.

25 Q. Why did the ASPCA not reimburse Mr. Rider

1 directly for his work on this project?

2 A. At the time, we had no way of getting the  
3 money to Mr. Rider because he was on the road and  
4 Meyer & Glitzenstein was able to wire the money to  
5 him.

6 Q. Did you consult with Mr. Rider about the  
7 contents of his testimony?

8 A. Of the contents of his testimony?

9 Q. Yes, referred to in this exhibit.

10 A. No. Mr. Rider can speak firsthand about  
11 his knowledge of what occurs at Ringling Bros.

12 Q. Did Mr. Rider know that the ASPCA was  
13 providing this funding?

14 A. I believe so.

15 Q. Have any other payments from the ASPCA to  
16 Meyer & Glitzenstein included funds that were  
17 intended to go to Mr. Rider?

18 A. No.

19 MS. DALTON: I would like to mark Exhibit  
20 9.

21 (ASPCA Exhibit No. 9 was  
22 marked for identification.)

23 BY MS. DALTON:

24 Q. And this is an e-mail to Dr. Hawk from you  
25 dated May 7th, 2001, correct?

1 Q. How did you pay him?

2 A. The money was wired to wherever he was  
3 through Western Union by Meyer & Glitzenstein and  
4 then we would be invoiced for it.

5 Q. Why did you not wire the money directly  
6 yourself?

7 A. I believe because Meyer & Glitzenstein  
8 already had an account set up.

9 Q. Did you send any additional e-mails  
10 requesting that this money be forwarded to Mr. Rider?

11 A. Any additional e-mails to Dr. Hawk?

12 Q. To anybody at the ASPCA regarding this  
13 money.

14 A. I may have had correspondence with Nancy  
15 Blaney at the time.

16 Q. But all documents that you still have in  
17 your custody have been produced?

18 A. Correct.

19 Q. Why is there no check request or invoice  
20 for this thousand dollar payment included in the  
21 document production that was provided to the  
22 defendants by the ASPCA?

23 A. I believe it would have been part of a  
24 payment made to Meyer & Glitzenstein.

25 Q. If we could turn back to Exhibit 3, which

1 Q. Next, in 2001, we see an expenditure to  
2 the Wildlife Advocacy Project for a grant of \$7,400  
3 for public education about Ringling Bros.'  
4 mistreatment of Asian elephants, correct?

5 A. Correct.

6 Q. And the Wildlife Advocacy Project is the  
7 group that we discussed that is associated with the  
8 law firm of Meyer & Glitzenstein, correct?

9 A. Correct.

10 Q. What did this, quote, public education,  
11 end quote, project entail?

12 A. That was funding Tom Rider to travel  
13 around the country and meet with the various media  
14 outlets, as well as testifying at public hearings in  
15 support of legislation to ban wild and exotic  
16 animals.

17 Q. Why did the ASPCA not include as part of  
18 its responses to defendants' document requests, any  
19 check requests or any documents relating to this  
20 payment?

21 A. We did.

22 Q. And can you refer me to that document?  
23 According to my review of those documents, the only  
24 check requests we received were from 2002 and 2003.

25 A. One was the \$6,000 check request, which

1 I'm not finding --

2 Q. We actually did not receive the \$6,000  
3 check request. We received the check request for a  
4 supplement to the \$6,000 check request.

5 A. Okay. It may have been -- I believe it  
6 was billed from Meyer & Glitzenstein as part of their  
7 general invoice. I don't recall.

8 Q. Who decided to spend the \$7,400 for public  
9 education through the Wildlife Advocacy Project at  
10 the ASPCA?

11 A. I was involved in that decision. I  
12 believe Nancy Blaney was involved in that decision  
13 and I believe Dr. Hawk needed to sign off on that  
14 check request.

15 Q. Next, from 2002 to 2004, you list  
16 expenditures that relate to a percentage of your  
17 salary and benefits plus an expenditure for a lawsuit  
18 filed under the Freedom of Information Act to obtain  
19 documents related to Ringling Bros., correct?

20 A. Correct.

21 Q. How did you determine what portion of your  
22 salary to allocate to this response?

23 A. It was an approximation.

24 Q. What part of your job entailed, quote,  
25 pursuing alternative sources of information about



1 of the species and their habitat, are you referring  
2 to a particular species?

3 A. No, just generally.

4 Q. Do you know -- is anybody employed by the  
5 Wildlife Advocacy Project?

6 A. I do not know.

7 Q. Do you know if they have any board  
8 members?

9 A. I do not know that.

10 Q. Who do you know that is associated with  
11 the Wildlife Advocacy Project?

12 MS. OCKENE: This is asked and answered  
13 already, but go ahead.

14 THE WITNESS: Kathy Meyer and Eric  
15 Glitzenstein.

16 BY MS. DALTON:

17 Q. And what is Tom Rider's association with  
18 the Wildlife Advocacy Project?

19 A. I have no idea.

20 Q. I would like to just go through and -- we  
21 looked at a few invoices that were produced, but I  
22 kind of want to go back and kind of recap what types  
23 of funding you provided to the Wildlife Advocacy  
24 Project.

25 And in 2001, I believe you said that you

1 had provided -- you may have provided some of that --  
2 some funding to the Wildlife Advocacy Project through  
3 your invoices to Meyer & Glitzenstein, is that  
4 correct?

5 A. That's correct.

6 Q. Can you estimate approximately what  
7 percentage of the Wildlife Advocacy Project expenses  
8 would have been included in your payments to Meyer &  
9 Glitzenstein?

10 A. Overall percentage -- I mean, overall  
11 expenses to Meyer & Glitzenstein?

12 Q. Exactly. And just in 2001 at this point.

13 A. I believe it was \$7,400 of the \$9,000.

14 Q. And that \$7,400 was all intended to go to  
15 Mr. Rider?

16 MS. OCKENE: Objection to form.

17 THE WITNESS: Sorry?

18 MS. OCKENE: I was just objecting to form.  
19 You can answer.

20 BY MS. DALTON:

21 Q. And you said that \$7,400 of the \$9,000 was  
22 marked as a payment to the Wildlife Advocacy Project?

23 A. Correct.

24 Q. What in particular was the \$7,400 a  
25 payment for?

1           A.     It was to reimburse Mr. Rider for his  
2     travel and general living expenses as he toured the  
3     country speaking with the media.

4           Q.     And in 2002, of your total payments to  
5     Meyer & Glitzenstein, what would you estimate was the  
6     payment intended for the Wildlife Advocacy Project?

7           A.     There was none.

8           Q.     Although there were no payments intended  
9     for the Wildlife Advocacy Project, you however had  
10    other payments that were intended to reimburse  
11    Mr. Rider, correct?

12          A.     Correct.

13          Q.     And I would like to have you run through  
14    that same analysis for 2003 specifically. Of your  
15    total payments to Meyer & Glitzenstein, what would  
16    you estimate were the payments intended for the  
17    Wildlife Advocacy Project?

18          A.     There were none.

19          Q.     But again, were some -- and then in 2003  
20    was the year when you stopped providing payments to  
21    Mr. Rider, correct?

22          A.     We provided reimbursements to Mr. Rider  
23    from January 2003 through May of 2003.

24          Q.     So in May 2003 was when you determined  
25    that you could no longer reimburse Mr. Rider for

1 these expenses?

2 A. Correct.

3 Q. And you said that that was a budgetary  
4 decision?

5 A. Correct.

6 Q. And who made that budgetary decision?

7 A. The budgetary decision was made in  
8 November of 2002. We formulate our budget for the  
9 following year in the November and December prior to  
10 that new year.

11 Q. And who is involved in the budgetary  
12 decision-making process?

13 A. Myself, our chief financial officer and  
14 president.

15 Q. And who is your CFO?

16 A. Steve Eudene.

17 Q. And your president is Dr. Hawk?

18 A. In 2003, it was Ed Sayres.

19 Q. And is there board approval for your  
20 budgets?

21 A. Yes.

22 Q. And who -- was one person in particular  
23 responsible for making the decision to stop funding  
24 Mr. Rider?

25 A. It was a joint decision.

1 Q. Between you, your CFO and your president?

2 A. Correct.

3 Q. And in 2004, there have not been any  
4 expenses to -- there were no expenses to Mr. Rider?

5 A. Correct.

6 Q. And there were no expenses to the Wildlife  
7 Advocacy Project?

8 A. Correct.

9 Q. And in 2005, so far there have not been  
10 any payments to Mr. Rider?

11 A. Correct.

12 Q. And there have been no payments to the  
13 Wildlife Advocacy Project?

14 A. Correct.

15 Q. So your payments to the Wildlife Advocacy  
16 Project were limited to 2001 and 2002, correct?

17 A. It was --

18 Q. I'm sorry, 2001.

19 A. Correct.

20 Q. Okay. Who approached you from the  
21 Wildlife Advocacy Project regarding this funding?

22 A. I don't recall.

23 Q. Do you recall whose idea it was to have  
24 payments provided to the Wildlife Advocacy Project  
25 that would eventually end up with Mr. Rider?

1           A.     It was a discussion between myself and  
2     Nancy Blaney, and she may have had a discussion with  
3     Darcy at the time.

4           Q.     When you say Darcy --

5           A.     Darcy Kemitz, who was a staff person  
6     working for the Wildlife Advocacy Project.

7           Q.     I had asked you previously about who was  
8     employed by the Wildlife Advocacy Project and you  
9     said you didn't know, so this is one person --

10          A.     Currently.

11          Q.     Okay. Let's go back and I'll ask you  
12     about that later. First I want to talk about this  
13     discussion that you had with Nancy Blaney and  
14     Darcy -- I'm sorry, what's Darcy's --

15          A.     Kemitz.

16          Q.     Can you spell that last name for me?

17          A.     I believe it's K-e-m-i-t-z.

18          Q.     Can you tell me the contents of that  
19     conversation, please?

20          A.     To the best of my knowledge, Darcy had  
21     been working with Tom Rider in assisting him with his  
22     work with the media to discuss his experience working  
23     for Ringling Bros. and their treatment of Asian  
24     elephants. And there was a conversation, to the best  
25     of my knowledge, between Darcy and Nancy Blaney as to

1 Mr. Rider's work with the media.

2 Q. And what was the conversation between  
3 ASPCA and wildlife Advocacy Project regarding  
4 Mr. Rider's work with the media? You said that Darcy  
5 and Nancy had a conversation, so I'm asking you about  
6 that.

7 A. To the best of my knowledge, it was how we  
8 could assist Mr. Rider in continuing that work.

9 Q. And was the decision as to how to assist  
10 Mr. Rider was providing the additional payments -- to  
11 assist by providing a grant in 2001?

12 A. Correct.

13 Q. And do you know what the decision was --  
14 do you know when the decision was made to provide  
15 that grant through Meyer & Glitzenstein and not  
16 directly to the Wildlife Advocacy Project?

17 A. I'm sorry, I don't understand the  
18 question.

19 Q. Just recapping what you said and then I'll  
20 follow up. You said that there was a conversation  
21 between Darcy and Nancy regarding the best way that  
22 the ASPCA could aid Mr. Rider's work with the media.

23 A. Correct.

24 Q. And as a result of that, you said that  
25 there was a decision that was made to provide a grant

1 to the Wildlife Advocacy Project in 2001?

2 A. Correct.

3 Q. My question is, why did you make the grant  
4 through Meyer & Glitzenstein and not directly to the  
5 Wildlife Advocacy Project?

6 A. The grant was made to the Wildlife  
7 Advocacy Project.

8 Q. So there was a separate grant to the  
9 Wildlife Advocacy Project?

10 A. That was the \$7,400.

11 Q. Which is listed -- on page 31 of Exhibit  
12 3, you list a \$9,000 payment to Meyer & Glitzenstein.

13 A. Correct.

14 Q. And you said that of that \$9,000, \$7,400  
15 was the grant to the Wildlife Advocacy Project?

16 MS. OCKENE: Objection. I think she said  
17 to the best of her knowledge.

18 THE WITNESS: To the best of my knowledge.

19 BY MS. DALTON:

20 Q. But now you said that it was a separate  
21 payment. I'm just trying to figure out the  
22 mechanisms of that payment, if the \$7,400 was  
23 provided to Meyer & Glitzenstein or if it was  
24 provided separately to the Wildlife Advocacy Project.

25 A. It's my understanding that it was issued



1 to the Wildlife Advocacy Project, which is housed in  
2 the same office as Meyer & Glitzenstein.

3 Q. You've named Darcy Kemitz as an employee  
4 of the Wildlife Advocacy Project?

5 A. At that time, yes.

6 Q. At 2001?

7 A. Correct.

8 Q. Do you recall any other individuals  
9 working for the Wildlife Advocacy Project at that  
10 time?

11 A. No, I do not.

12 Q. Do you recall any employees of the  
13 Wildlife Advocacy Project prior to 2001?

14 A. I do not know.

15 Q. What about following 2001?

16 A. I do not have that information.

17 Q. Do you know what percentage of the  
18 Wildlife Advocacy Project's efforts were focused on  
19 Ringling Bros.?

20 A. No, I don't.

21 Q. Do you know what percentage of the  
22 Wildlife Advocacy Project's efforts were focused on  
23 the issue of elephants in circuses?

24 A. I don't.

25 Q. I just want to go back and ask a few more

1 A. That's Patricia Jones.

2 Q. And Patricia Jones is your head of media  
3 affairs?

4 A. She was.

5 Q. She was your head of media affairs?

6 A. Correct.

7 Q. I'm sorry, I've probably asked you before  
8 but just to refresh my memory, who is Karen  
9 Colangelo?

10 A. Karen Colangelo, she worked in the media  
11 relations department. I don't recall what her title  
12 was.

13 Q. So she reported to Patricia Jones?

14 A. Correct.

15 Q. And in your first sentence, you say that  
16 the visit was, quote, "quite an eye opener for both  
17 me and Karen Colangelo."

18 A. Correct.

19 Q. And what was eye opening about the visit?

20 A. I think we were not aware of all of the  
21 interviews he was doing with the media. We were  
22 aware of some of them, but not all of them.

23 Q. So is that what you're referring to when  
24 it says, "Tom has been doing some impressive PR work  
25 for us"?

1 A. Yes.

2 Q. And his impressive PR work, was that just  
3 all just press interviews?

4 A. Yes.

5 Q. Were there any other activities he was  
6 doing that you can recall?

7 A. No.

8 Q. What were the, quote, "outstanding  
9 logistical problems" to which you refer in the next  
10 sentence?

11 A. I believe they had to do with when Darcy  
12 was working with Tom directly.

13 Q. And can you refresh my memory as to who  
14 Darcy is? She's one of the people who was involved  
15 in your D.C. office, correct?

16 A. No, she was with the Wildlife Advocacy  
17 Project.

18 Q. That's right. So what in particular were  
19 the outstanding logistical problems?

20 A. I think it was more a breakdown in  
21 communication between us certainly and maybe between  
22 her and Tom, in terms of her working in conjunction  
23 with Tom in his media visits.

24 Q. So he was not, for example, maybe getting  
25 the support he needed from you all?

1           A.     Right. You know, faxing the press release  
2     and media kit to the upcoming reporter ahead of time,  
3     that type of thing.

4           Q.     And these issues were resolved, it says?

5           A.     Yes. We decided to bring it in-house,  
6     meaning that the ASPCA's media relations staff would  
7     essentially be doing what Darcy did.

8           Q.     So it would be moving the logistical  
9     issues from the Wildlife Advocacy Project to ASPCA?

10          A.     Correct.

11          Q.     Did this also include changing the way in  
12     which you helped reimburse Mr. Rider for his  
13     expenses?

14          A.     Not to my knowledge. In 2002, we were not  
15     paying Mr. Rider directly in terms of reimbursement.

16          Q.     And 2002 is the year that you were paying  
17     Meyer & Glitzenstein, correct?

18          A.     Right.

19          Q.     So when you say that the logistical  
20     problems had been resolved, you mean it dealt with  
21     how he was receiving faxes and other media support?

22          A.     Correct.

23          Q.     And then the next sentence reads --  
24     actually, I'm sorry. When you said media efforts,  
25     I'm just confirming that when you say media efforts,

1 that involves his contacts with the press and his  
2 interviews with the press, correct?

3 A. Correct.

4 Q. Going back to where I was before, the next  
5 sentence reads, "After better understanding the  
6 nature of his needs and his abilities, I think it is  
7 doable. Karen also knows that government affairs can  
8 serve as a backup when needed." I'm assuming that  
9 understanding the nature of his needs and abilities  
10 refers to Mr. Rider's needs and abilities?

11 A. Correct.

12 Q. And what needs and abilities were you  
13 referring to?

14 A. It was more just coordinating his work  
15 with -- integrating it into the work of the media  
16 relations department with other issues they were  
17 handling for the organization.

18 Q. What were his abilities that you were  
19 referring to?

20 A. Speaking firsthand about when he was  
21 working at Ringling Bros. and the treatment of the  
22 elephants.

23 Q. And what do you mean by I think it is  
24 doable? Specifically what was doable?

25 A. Integrating it, his increased requests by

1 the media to speak with him and being able to service  
2 those needs and requests within our media relations  
3 department.

4 Q. And how did you think that -- what was  
5 your plan for having government affairs serve as a  
6 backup to that?

7 A. No, Karen was going to serve as backup.  
8 I'm sorry. Oh, yes. Okay. That if media relations  
9 could not send the faxes out and the press releases  
10 because they were involved in another project for the  
11 organization, that the government affairs  
12 administrative assistant could take up that slack.

13 Q. The next sentence reads, "The commitment  
14 and sacrifices this guy has made for the last year is  
15 truly impressive." I am assuming that this refers to  
16 Mr. Rider again, correct?

17 A. Correct.

18 Q. And what sacrifices were you referring to?

19 A. Well, he basically lived on the road.  
20 Oftentimes he would sleep in the Greyhound bus  
21 station. He went wherever he was needed by the media  
22 to speak with him.

23 Q. And then the level of your funding, you  
24 had originally budgeted \$24,000 to assist in  
25 Mr. Rider's efforts, is that correct, based on that