

medical situation. Visits to healthy elephants, with no conditions or treatment to document, typically do not get recorded other than to state “examine on site” or “vet on site.”

5. As an example, Asha elephant is a healthy four-year old elephant. Her medical history document reflects this by containing notes of visits, rather than containing notes regarding medical conditions or treatments.

6. An elephant’s medical record is dependant upon his or her health. No elephant’s medical records will be identical to another’s.

7. Certificates of veterinary inspection are not considered to be medical records. FEI does not maintain such an inspection certificate in an elephant’s medical file, and it is not created to facilitate treatment of an elephant. Such a document is akin to an inspection document or permit document, which varies from state-to-state, and is required to transport an animal through the state. Typically, such inspection certificates expire thirty (30) days after they are issued.

8. A laboratory report is a meaningful document for a veterinarian and, as such, does not require separate written analysis.

9. When a consulting or on-call veterinarian treats an FEI elephant, the practice is for that veterinarian, if appropriate, to add to the elephant’s veterinary record while on site or by subsequent communication.

10. *Nocardia* bacteria is found worldwide in soil. Elephant trunk washes frequently contain normal organisms found in soil. They do not indicate infection.

11. Sarah elephant did not have surgery for a fistula and therefore there is no document for that procedure.

12. The medical history of Asia elephant contains various entries regarding lameness. The intermittent entries that do not discuss Asia's lameness indicate that she was not exhibiting symptoms sufficient to note, or otherwise warrant treatment for, at those times.

13. None of FEI's baby elephants has ever died of the condition known as elephant endotheliotropic herpesvirus (EEHV) or "herpes." FEI owns one of the few elephants who successfully recovered from EEHV.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.


Ellen Wiedner, V.M.D., D.A.C.V.I.M.

Executed on July 6, 2006.