

**PLAINTIFFS' EXHIBIT O**  
To Plaintiffs' Opposition to Defendants' Motion  
For Summary Judgment  
Civ. No. 03-2006 (EGS/JMF)

AFFIDAVIT

I, (name of affiant) **ROBERT LEE RIDLEY**, being duly sworn on oath make the following statement:

ℓℓ Freely under oath to Mr. Samuel Santiago who has identified himself as an Investigator with USDA, APHIS, INVESTIGATIVE & ENFORCEMENT SERVICES. I am the Veterinary Technician of the Blue Unit, FELD ENTERTAINMENT INC DBA RINGLING BROS AND BARNUM & BAILEY CIRCUS. I have been in this position about 18 years. I have been in this organization for about 32 years. The phone contact is 703-448-4000.

Investigator Santiago has inquired regarding a complaint of abuse of the elephants in the Blue Unit. I have not seen any abuse of any of the elephants in the circus. ~~The ankus is used properly in the circus.~~ I have seen hook boils on some of the elephants. I have seen them on the side of the trunks and on the underside of the legs. I would not consider them to be major injuries. They would heal in a few days. I would treat them with Betadine solution or Wonder Dust. I probably treated the last hook boil in November 1998. I do not know how the boil occurred. I do not recall which of the elephants I treated on this last occasion. I recall a small boil and about 3 or 4 drops of blood. I see hook boils twice a week on an average. Hook boils are common in elephants. I have seen Pat tap the ankus on the baby elephants under the chin but not to the extent of injury. I have seen Randy do it also. Karen could be dangerous only to new people and when chained. I would not consider Karen to be a hazard whenever there is an experienced handler with her.

I consider Randy's interaction with the elephants is good.

I do not concur with the allegations that the elephants are being abused.

I have read and had the opportunity to change and correct this sworn statement which is true and correct to the best of my knowledge. ℓℓ

Robert Ridley  
SIGNATURE OF AFFIANT

Subscribed and sworn to before me at **Sunrise, Florida**  
on this **9th** day of **January**, 1999

APHIS FORM 7162 Replaces VF Form 3-59G which is obsolete  
(NOV 92)

[Signature]  
DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS.  
AUTHORITY NO. 3015

FELD 0023386