

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
AMERICAN SOCIETY FOR THE)	
PREVENTION OF CRUELTY TO)	
ANIMALS, <u>et al.</u> ,)	
)	Civ. No. 03-2006 (EGS)
Plaintiffs,)	
)	
v.)	
)	
RINGLING BROS. AND BARNUM)	
& BAILEY CIRCUS, <u>et al.</u> ,)	
)	
Defendants.)	
_____)	

**PLAINTIFF TOM RIDER’S 2d SUPPLEMENTAL RESPONSES
TO DEFENDANTS’ FIRST SET OF INTERROGATORIES**

These are Plaintiff Tom Rider’s 2d Supplemental Responses to Defendant’s First Set of Interrogatories, which are being provided pursuant to the Court’s August 23, 2007 Discovery Order (Docket No. 178). All of the definitions and objections contained in Mr. Rider’s earlier Interrogatory Responses apply here as well. Notwithstanding any of those general and specific objections, Mr. Rider is providing all of the information required by the Court’s Order.

Interrogatory No. 2:

Describe each and every job or volunteer position you have held since you completed high school (or, if you never completed high school, since your last year of schooling) that you did not describe in response to the previous interrogatory.

Supplemental Response to Interrogatory No. 2:

Although I do not consider the media, legislative, and public education advocacy that I have done for any other organization to be a “job,” I nevertheless state that I also performed the

contend that all of defendant's elephants at the Center for Elephant Conservation are similarly chained.

I further rely on the following video footage produced by defendant: FELD-VID 001, 002, 006, 007; FEI 0010, 0013, 0016, 0017, 0018, 0019, 0020, 0025, 0026, 0436, 0437, 10350, 10351, 10352, 10354, 10355, 10357, 10358, 10359, 10360, 10361, 10362, 10364, 10365, 10366, 10367, 10368, 10369, 10383, 38227, 38228, 38229, 40957, 40958, 40960, 40965, 40966, 40968, 40970, 40971, 40974, 40975, 40982, 40983, 40984, 40985, 40986, 40987, 40989, 40990.

Additional information responsive to this Interrogatory is contained in footage that plaintiffs have reviewed and requested from defendant, but that has not yet been produced by defendant. Once plaintiffs obtain that footage, I will supplement this response accordingly.

Interrogatory No. 24:

Identify all income, funds, compensation, other money or items, including, without limitation, food, clothing, shelter, or transportation, you have ever received from any animal advocate or animal advocacy organization. If the money or items were given to you as compensation for services rendered, describe the service rendered and the amount of compensation.

Supplemental Response to Interrogatory No. 24

In March 2000, PAWS paid for an airline ticket for me to come to Galt, California so that I could be deposed by PAWS' attorney.

From March through December 2000, and January - February, 2001, I received approximately \$50 a week from PAWS to pay for my living expenses while I did media, legislative, and public advocacy for PAWS concerning the mistreatment of Asian elephants by the Ringling Brothers Circus. During this time PAWS also paid my motel bill at an inexpensive motel near Galt, California, and it paid for some airline tickets for me to go to Las Vegas,

Nevada to do media work; to attend a press conference in Phoenix Arizona; and to testify before the United States Congress in June 2000 regarding a bill to ban elephants in circuses, and to speak to officials at the United States Department of Agriculture about this matter. A copy of the 1099 from PAWS for 2000 is being produced, along with copies of documents showing some of the airline travel and the hotel bill for my stay in Washington, D.C. in June 2000. I did not receive a 1099 from PAWS for 2001.

In February 2001, I went to live on PAWS' sanctuary, "ARK 2000." I lived in a used motor home that PAWS provided to me, and PAWS continued to give me additional funds to pay for my living expenses – it was a little more than \$50 a week to account for the additional expense of gas for the motor home and a gas generator that I used for electricity, but I do not remember exactly how much it was. I continued to do media and legislative advocacy for PAWS as described above, and I also watered some of the plants at the sanctuary, fed the wild turkeys, and performed some security for PAWS by watching the gate.

Since May 2001, I have received grant money from other animal advocacy groups to do media and legislative advocacy and public education concerning the way elephants in circuses are treated. That funding has been used for my living expenses while I travel across the country to do this advocacy, first by Greyhound bus (I usually slept on the bus, but occasionally stayed in an inexpensive motel room), and then (and continuing to today) in a used van which I usually park in a camping ground or parking lot and sleep in (but sometimes stay in a motel room). Those expenses have included Greyhound bus tickets, hotel bills, camping registration fees, food, clothing, gas money, gas for a generator, and the other necessities of every day living – while I travel back and forth across the country and visit numerous cities each year to talk to reporters,

editors, producers, legislative bodies, grass roots groups, and individuals about what really goes on behind the scenes at the circus and the systematic daily abuse that the elephants must endure. The amount of grant money I have received from the Wildlife Advocacy Project (“WAP”) for this advocacy is identified in the 1099s from that group which I am producing (Bates Labels: TR 457-461).

To the best of my recollection, over the last six and a half years I have received the following additional amounts of funding and other items for this advocacy from the following animal advocacy groups:

- ASPCA: approximately \$6,000; the ASPCA also paid for my cell phone for part of the year in 2002 and in 2003, and sometimes paid for hotel rooms for me; it also gave me a used lap top computer to use.
- AWI: approximately \$1,600; in addition, AWI paid for car repairs for my van in January, 2007
- FFA: approximately \$1,000
- API: approximately \$50.00; in addition API paid for a round-trip plane ticket so that I could go to Omaha, Nebraska in January 2006 to testify in support of legislation, and I believe that it also paid for my hotel room for 2 days while I was there.

In addition, during 2001 - 2003, I received approximately \$ 9,000 from the law firm Meyer & Glitzenstein that was reimbursed by the organizational plaintiffs for my expenses in connection with my media, legislative, and public education advocacy. I am producing the 1099 form that I received from Meyer & Glitzenstein that reflects part of this information (TR 00456); the plaintiff organizations are producing other documents concerning this information (F 04493-04516; AWI 09932-09939, 10054-10063); and the ASPCA documents that pertain to this information will be identified when the ASPCA submits its responsive documents.

From all other animal advocacy groups over the last seven years, other than the plaintiff groups, or WAP, I have received:

approximately \$25,350; plus one of those groups also paid for a round-trip train ticket for me to go from Los Angeles to Chicago in March 2006 so that I could speak to the City Council in support of legislation that would ban the use of bull hooks on elephants, and it also paid my hotel bill for 2 days while I was there; and another group paid for a plane ticket for me in July 2001 so that I could speak to the City Council of South Hampton, New York about proposed legislation concerning circuses.

None of these groups are parties to this lawsuit, attorneys for any of the parties, or employees or officers of any of the plaintiff organizations or WAP. See Order (Docket No. 178) at 3.

In July 2003, my attorney Katherine Meyer personally provided me approximately \$ 600 to pay for a round-trip plane ticket from San Francisco to Washington, Illinois, so that I could attend my sister's funeral.

In addition, over the last seven years, I received approximately \$ 7,690 from nine different individuals who could probably be described as "animal advocates." None of those individuals are parties to this lawsuit, attorneys for any of the parties, or employees or officers of any of the plaintiff organizations or WAP. See Order (Docket No. 178) at 3.

Pursuant to 26 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.



Tom E. Rider

9/24/2007
Date