

DECLARATION OF SAMUEL DEWITT HADDOCK JR.

I, Samuel Dewitt Haddock Jr., declare as follows:

1. I am currently 53 years-old and competent to make this declaration. The information set forth in this declaration is based on my personal knowledge of events described herein unless otherwise noted.
2. I reside at [REDACTED], and my telephone number is [REDACTED]
3. I worked as an elephant trainer, handler, and/or caretaker for Ringling Bros. and Barnum & Bailey Circus off-and-on from 1976 until 2005. I left Ringling in 2005 to care for my ailing wife, Millie, who was dying from complications of diabetes.
4. I had requested a humanitarian leave from Harry Sugarman, Feld Entertainment's human resource officer, but was denied. Millie died in February 2008. My wife never liked what the elephants went through at the circus, especially the baby elephants, or that I was a part of it. Before she died, she told me, "Sammy, I know you'll do the right thing." I have contacted People for the Ethical Treatment of Animals (PETA) in an effort to "do the right thing."
5. I was mentored in the practice of training and handling elephants by Gary Jacobson, William ("Buckles") Woodcock, Theodore Svertesky, and Gary Hill.
Training Baby Elephants at Ringling's Center for Elephant Conservation
6. Gary Jacobson, head trainer, hired me in August 1997 to work as an elephant handler at Ringling's breeding farm, called the Center for Elephant Conservation (CEC) in Polk City, Florida, where I worked off-and-on for about ~~10~~ years. I left CEC in 1999 and was re-hired back in August 2002. While I was not working

S.H. / 6

there, I often dropped in for visits. My job title was animal care groom and my duties included mucking the barns, feeding and watering the elephants, taking care of the grounds, and to help with training the baby elephants. I was basically a full-time ranch hand.

7. While I was at CEC, the facility had more than a dozen employees. I reported directly to Gary Jacobson. Other employees who worked there while I was there included [REDACTED]
[REDACTED]
[REDACTED] who just got out of prison for DUI manslaughter for killing a little girl, [REDACTED]
[REDACTED]
8. I was involved in training about eight or so elephants born at CEC, including Angelica, Asha, Doc, Gunther, Kelly Ann, P.T., Rudy, and Sara. All the babies were trained in the same fashion. Benjamin and Shirley were probably the first elephants being trained while I was there. Babies are typically pulled from their mothers around 18-24 months of age. Once they're pulled from their mothers, they've tasted their last bit of freedom and the relationship with their mother ends.
9. When pulling 18-24 month-old babies, the mother is chained against the wall by all four legs. Usually there's 6 or 7 staff that go in to pull the baby rodeo-style. We put ropes around the legs, one leg at a time. No specific leg first. The ropes are tied off to the pipes. We bring in an anchor elephant and put a rope collar around the anchor elephant and put the other end around the baby's neck. The anchor elephant leads the baby to the North end of the barn. It can take between

30 minutes to an hour to capture and restrain the baby. The baby tries to run away and fights having the ropes put on. Some mothers scream more than others while watching their babies being roped. If the screaming matches continue after the baby has been moved, we might take the mothers outdoors to quiet them down.

10. The first step in training a baby elephant is to cinch cotton-rope slip knots around all four legs, the other end is tied around a bar, and they are restrained in the North end of the barn, the opposite end from where their mothers are chained in the birthing pens. I've seen up to five baby elephants in this area restrained at one time.
11. Sometimes, from outside of the barn, you could hear one baby start screaming, and then the others would join in. Sometimes they would start crying when they saw their mothers brought in from outside. The babies often had rope lesions from straining against the ropes that would require treatment with betadine in a salve form.
12. During the first 10 days of being tied up, we'll use an anchor elephant to keep the baby from taking off while we take the baby on a short walk inside the barn to get them used to human handling and to give them a little exercise. The baby has a collar made from rope around its neck that is attached to a collar around an adult elephant's neck. The adult elephant used as an anchor is never the baby's mother. The baby is walked twice a day. The babies spend about 23 hours each day restrained.
13. Next, we'll take them on short walks in the barn without the anchor elephant. We untie the ropes from the bars but leave the cinch rope around their legs. They are

surrounded by six to seven people. One, or sometimes two people hold the ropes on each leg, one out front in case they run and a trainer on both sides of the head. A bullhook is kept on the front of the elephant's trunk. More hook pressure is applied if they pick up the pace. They are walked around the barn for about 2 to 3 laps for 30 minutes and given treats to distract them from running. They are never turned loose outdoors to play; that would defeat the purpose, all their movements are under the control of staff.

14. After they stop struggling from being restrained with the ropes, which could take up to six months, ropes are replaced with chains that are padded with clear plastic tubing.
15. If the elephant is not trying to escape while being walked, we might take them outside. We'll take them about 75 to 100 yards to the wash-off area and give them a bath.
16. Gary decides on the spot during a walk outdoors, "Let's take them to the ring." We walk them around the ring to get them used to it for about a week. Then basic training is over and it's time for full-fledged training. Full-fledged training sessions last 1-1/2 to 2 hours each, twice per day, until they get it right. They go through the same routine every day. We put them in the ring where they are trained to lie down, sit up, down-salute, spindle, where 2 to 3 guys make the elephant turn while one foot is on a spindle. It could take up to a year of training before they're ready to go on the road.
17. No one is allowed in the training area and the training area is fenced in with solid fencing so no one can see. Loud rock-and-roll music is played to drown out the

baby's screaming and to get them used to the music played in the circus. After the initial training session, the babies fight to resist having the snatch rope put on them, until they eventually give up. The snatch rope goes over their back, under their belly, and is fastened to their left hind leg. We drive stakes into the ground in the ring area. The ropes are tied to the stakes or to bars.

18. I have provided photographs to PETA that I took during some of these training sessions. To the best of my knowledge, most, if not all, of these photos were taken in 2001 and 2002. These photos reflect training procedures that I observed throughout my employment at CEC. When I left in 2005, baby elephants were being trained in the same manner shown in these photos. To my knowledge, training procedures have not changed since I left. Based on my experience, these violent training methods are the only way an elephant can be trained to perform certain tricks required for a circus act. It's bunk when the circus says that it's showcasing an elephant's natural behaviors.

19. The photos show baby elephants in various stages of being trained. Numerous photos taken in the training ring show a baby elephant with ropes tied around all four ankles, around the trunk, waist, and neck. There are 5 to 7 trainers present. As many as four adult men will pull on one rope to force the elephant into a certain position, such as lay down, stretch, or sit up. My role during these training sessions was to pull on ropes and clean up the crap. Others use bullhooks and hot shots. I've seen Gary Jacobson and his wife Kathy using hot shots to train baby elephants. Some photos show Gary Jacobson using a hot shot on baby elephants. Gary usually kept a hot shot in his pocket to use in training sessions.

20. Training a baby to lie down is one of the more difficult tricks and is done in three sequences. First, it's stretched out by all four legs, then it's dropped to its hind quarters, then it's slammed down. The throw down rope is connected to a neck rope that connects to the left hind leg and is anchored to a stake driven in the ground or a bar on the side of the paddock. On Gary's command, he says pull, several guys will yank on the rope, which pulls the baby's left leg underneath it and Gary pulls down with a bullhook on top of the ~~head~~. The baby elephant is slammed to the ground and held there for ~~3 to 4 minutes~~. Then the tension is released, we let it up, give it a break, and do it all over again. During these training sessions, the baby is screaming and struggling the whole time. Some photos show the elephant's with their mouths open because they are screaming.
21. A photo of a baby learning the head stand shows a baby on its head, someone is pulling on a rope attached to the trunk. The trunk is pulled between the front legs, two people are poking the elephant on the tender spots on its hind feet so it will keep its legs raised and Gary is hooking the tender spot behind its head so it won't raise its head.
22. Training techniques used by Gary Jacobson include a lot of man power, brute force, electricity, and a savage disposition. Raising a baby elephant at Ringling is like raising a kid in jail.
23. Gary Jacobson told me that when he retires they plan to bring in Joe Frisco Jr. and Terry Frisco as a replacement.

Riccardo

24. I was at CEC when Gary Jacobson was training 8-month-old Riccardo the day Riccardo died. This was the first time Gary had decided to take Riccardo to the training area. It was unusual to train such a young elephant, especially one that was undersized for his age. His mother Shirley rejected Riccardo at birth and he was kept by himself in a pen and bottle fed. Being bottle fed, he was way undersize.
25. I was inside the barn when Gary and Kathy brought Riccardo back to the barn after he injured himself. He collapsed in the same pen where he was born and he appeared to be in shock. One of the employees told me and the rest of the animal crew who were present in the barn that Riccardo fell off the tub in the practice ring (there were no bull tubs in any play area) and busted up his legs and started screaming. This was early, around 8:30 a.m or 9:00 a.m. No other elephants had been out in the ring yet. Someone, I believe it was Gary, instructed me to clean up the ring about 5 minutes later. When I went out to clean up the ring, I saw the bull tub that Riccardo had fallen from. The tub was about 20"-24" inches tall, much taller than Riccardo's legs. Myself, along with others on the animal crew including Gary's wife, Kathy, were surprised that Gary had put Riccardo on a tub that was so tall.
26. I was told that when Riccardo fell off the bull tub, his front legs hit the ground first and his hind quarters hit the tub as he fell. Despite being wobbly on his legs, he was made to walk about 100 yards to the barn where he collapsed in his pen and never got up again. I had to go out back to the ring and clean up the baby crap because he'd messed all over himself when he fell off the tub.

27. Once he got back to the pen and collapsed, he was not moving. His eyes were open and he was breathing. Myself, along with a few others, had to lift him onto a board and slide it into a trailer, similar to those used to haul horses. He was driven to the veterinary college in Gainesville, about 135 miles away. Later that afternoon, we heard that the vet called back to the farm and said the elephant had broken his legs and he was euthanized. I could tell by looking at Riccardo that he was in bad shape and probably wouldn't make it.
28. Even before this training exercise, it was obvious that he didn't have much strength in his legs, he was pretty clumsy. I was never interviewed by the USDA about Riccardo's death. None of my colleagues who were present when Riccardo died ever mentioned being questioned by the USDA in relation to his death.

Birthing

29. Except for the adult bull elephants and the babies that have not yet been pulled, all the elephants at CEC, including mothers that are about to give birth, are chained up from about 4 p.m. to 7 a.m. every night. Someone sleeps in the barn when the birth is imminent and there are cameras on the birthing pens. When she shows signs of labor, the vets are called in and some of the staff is brought to the birthing area.
30. When the calf drops, it lands on a concrete floor. The calf is pulled away by staff, washed off, inspected and usually introduced back to its mother a short time later.
31. Since males can only perform in the circus for a few years before they become too unmanageable and dangerous, the circus prefers females. Someone might express

disappointment and say “just another male” if a male calf is born.

Inspections

32. During USDA inspections at CEC, we would try to hide injuries, such as rope burns, from USDA inspectors by putting mud on their legs. Hot shots are kept hidden.
33. It is my understanding from Gary that Ringling has an arrangement with the USDA that the agency is only allowed to conduct two announced and one unannounced inspection per year at CEC.
34. I am not aware of any inspections conducted by the Florida Fish and Wildlife Conservation Commission.

Tuberculosis

35. In late 1978, I left Ringling’s blue unit and went back home to [REDACTED] and took a job working in construction. When I returned home, my brother, who was a medic in the military heard me hacking in my sleep, and warned me that it sounded like I might have tuberculosis. I was diagnosed with active TB about a month or two after leaving the blue unit. I was hospitalized and quarantined for two weeks and treated for a year. While I worked at Circus World, I knew from Theodore Svertesky that elephants at Circus World had TB and we had tried to treat them.
36. After I was diagnosed with TB, the health department had the entire blue unit tested for TB. [REDACTED] tested TB-positive and were treated. [REDACTED] was treated for exposure.

37. All the elephants at CEC have been treated for TB, some because they were TB-positive, others because they were exposed.
38. Vance, a bull elephant, is in bad shape from TB. He has lots of trunk discharge and is spitting sputum all over the place. He had TB while I worked there, and I saw him again 6 to 8 months ago. He's lost a lot of weight. He's no good for breeding any more. He's rogue, treatment is a big ordeal so they've stopped.
39. At CEC, the vet ordered TB meds in bulk from a drug company in Gaffney, SC. He would order 750,000 tablets at a time.
40. *S.H. / MOST* ~~CEC employees~~ cannot take skin tests for TB because they've had TB. They have to take chest x-rays once per year.

Career Background

41. My circus career started in 1976 when I got a job at Circus World in Haines City, Florida. I was right out of high school. At the time, Circus World was owned by Ringling. My supervisor was Gary Hill. I worked there for about a year walking elephants in a circle for elephant rides and cleaning up after the elephants.
42. I left Circus World to join Ringling's touring blue unit and worked under Buckles Woodcock. I began as a groom for Minyak and four other elephants known as the "Minyak 5." At the time, there were 22 elephants on that unit. As a groom, I prepped the elephants for shows, mucked out their stall areas, and provided water and food. Buckles had warned me, if you see the whites of the elephant's eyes, they're "eyeballing" you and that's cause to correct them on the spot. "Eyeballing" meant that they were looking for an opportunity to attack.

43. In 1977, on my first night with the blue unit, [REDACTED] and I were dragging hay to the elephants in stockcars. Vance, who was nicknamed "Punchy" because he punched everybody, hit me under my jaw with his trunk. I went flying and was knocked out. When I woke up, I was under Gildah. Vance was straining against his chains trying to reach for me. At first, I thought Gildah had downed me. She was stretched out over me, but was barely touching me. Gildah was protecting me from Vance. Either she didn't want to see me hurt, or didn't want to see Vance punished for acting up, or both. I had an abrasive scrape wound on my chest and chin caused by the friction of Vance's rough-skinned trunk hitting me with such force [REDACTED] found me a minute later. I went after Vance with a hot shot in the stockcar. I burned out two hot shots and fried him for about ten minutes. He was screaming and regurgitating water.

44. A year later, I left the blue unit and went back home to [REDACTED]

45. Buckles left Ringling when they could not reach agreement on a contract and he went to work for the Big Apple Circus. Axel Gautier transferred from Circus World and took Buckle's place on the blue unit. Franz Tisch was hired to replace Gautier at Circus World. Tisch hired me back to the circus in 1978. I was hired as an experienced bull hand to manage the tough elephants, Major, Vance, Hugo, Juno, Syd, and Charlie. These elephants had been on the road for two years and were taken off and brought to Circus World. I was hired by Franz to "square them all away," the circus term for beating an elephant. Franz couldn't work Major or the other tough elephants. Gunther Gebel-Williams had gotten Franz the job.

Gunther was a horse and cat man. He worked elephants, but didn't know how to train them.

46. One day, Major and Juno nearly killed an elephant handler named [REDACTED]. They were on the picket line, outside, chained by one front leg. When [REDACTED] walked by, Major knocked him over to Juno with his trunk. Juno knocked him back to Major with her front leg. Major was trying to do a head stand on [REDACTED] and I rescued [REDACTED] as Major was trying to gore him with his one short tusk. He was bruised, but didn't need to go to the hospital.
47. Sometime after that, Major knocked me down at Circus World. I walked into the barn to throw down hay. Major lunged forward and got me on the head with his trunk and tried to gore me with his one tusk. I was knocked into the barn wall. I went behind Major and beat him for five minutes with a bullhook and used a hot shot. I took a break, then beat him more. I laid him down and hooked him repeatedly in his ear canal. The second beating lasted 10 minutes. Major was screaming bloody murder.
48. Major was a very dangerous, rogue elephant who is now dead. Theodore Svertesky put Major down in Venice, Florida. Svertesky was later killed in Ringling's 1994 train wreck. When the train derailed, a refrigerator fell on him.
49. After about six months of being back at Circus World, sometime in 1978, Gary Jacobson offered me a job working for him in Reno at the JA Nugget casino. I was hired to train Tina, a young elephant who performed with an older elephant *S.H. Help* named Bertha. Tina was originally named Brenda and came from Carson &

Barnes Circus. ~~She~~ was running amok on stage. She was six years old and we had only six weeks to train her. Gary Jacobson and I trained her with brute force.

SH The ORIGINAL TINA

50. Tina could lie down, move up, trunk up, but didn't do them very well. We trained her to "bottle walk." The "bottle walk" is where they walk on small pedestals and they have to synchronize their front and opposing back leg while walking forward and backward.

51. We trained Tina to walk a balance beam, pull slot machines with her trunk, head stand, hind leg stand, front leg walk, and we harness broke her.

SH STAND

52. We trained Tina by working with her twice a day, 1-1/2 hours each session; beatings were daily. She was a smart elephant and caught on quick. She had quite a few hook marks on her and we used quite a bit of electricity. Tina had one day off a week, but we still worked her on her day off by putting her through her routines to see what she had learned.

53. Bertha knew not to crap on stage, but Tina didn't. Tina was fed sparingly during the day so that she wouldn't crap on stage while performing inside the theater. Gary presented the elephant act during the show. We opened for a number of famous entertainers, including Red Skelton, Dick Clark, Bo Diddly, and Susan Anton.


54. I worked at the Nugget for six months. I quit in 1979 and went to Myrtle Beach, S.C., where I again worked in construction. I left because I didn't like Reno and was tired of working there. Gary was at the Nugget for about two years.

55. I was out of the circus business for awhile and worked in carpentry and construction. In 1997, Gary Jacobson hired me to work at CEC.

56. When Kenny, the baby elephant, died on the road in 1998, Gary told me that Mark Oliver Gebel called him up at CEC and said, "Send me another," like he was ordering up a replacement for a broken prop. Gary refused to send him another baby.
57. I was absent the day that David Mannes was attacked in 2005. A co-worker told me the next day what happened. Tova nearly killed him while he was moving Tova out to a pen and crushed him up pretty bad.
58. Some power tricks they've stopped doing because it was crippling the elephants at too young of an age and causing arthritis and ruptures in their uterus. Power tricks include standing on a tub on one leg and walking on their hind legs. The one foot stand has crippled quite a few elephants, including Sophie.
59. The bullhooks used in the ring during a show are called "show hooks." It's smaller and the handle is painted black or taped with black plastic tape so it can't be seen by the audience. Bigger, non-breakable bullhooks are used in training and handling.
60. A bullhook was never referred to as a "guide." I never heard anyone in the circus ever refer to the bullhook as a "guide." The bullhook is designed for one purpose, and one purpose only, to inflict pain and punishment. I should know, I used to make them. I built them to where you can't break them, no matter how hard you hit the elephant. The first test is to go out to an oak tree and test drive it by whacking as hard as I could to try to break it and to try to shake the hook loose. I've probably made at least fifty bullhooks throughout my career.

61. During the course of my career, I've seen elephants being beaten who have no idea why they are being beaten or what is expected of them. They will start randomly lifting one leg, then another and another, lifting their trunk, hoping some trick will satisfy the trainer and make the beating stop.

62. Towards the end of my career, when someone would ask me what I did for a living and I'd say that I was an elephant trainer for Ringling, the first thing they would ask is, "Is it true you have to beat elephants to make them perform those tricks?" I stopped telling people what I did for a living. I was ashamed.

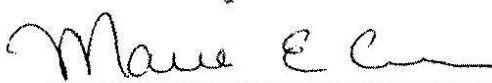

Samuel Dewitt Haddock Jr.

State of Florida

County of Lake

City of Clermont, to-wit:

Subscribed and sworn to before me this 28 day of August 2009, by
Samuel Dewitt Haddock Jr.



Notary Public

