

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF JEFFREY A. BRISCOE

I, JEFFREY A. BRISCOE, declare and state as follows:

1. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify thereto.

2. I am a Principal Animal Keeper at the Los Angeles Zoo (the "L.A. Zoo"), and the manager of the L.A. Zoo's elephant exhibit. I have been in my current position since 1995. As the manager of the elephant exhibit, I am responsible for the care and management of the L.A. Zoo's elephant population, which I do with the assistance of a staff of three full-time animal keepers, who I supervise.

3. In addition to my years of experience handling, observing and caring for the L.A. Zoo's elephant population, I have extensive training in elephant management and elephant conservation. I have attended numerous elephant workshops and conferences, including the United Nations conference on elephants in Bangkok, a human/elephant conflict conference in Sri Lanka, and other conferences in India, Thailand, Cambodia and elsewhere. I have attended the annual Elephant Managers Association conference, as well as conferences on specific elephant health issues, including foot care.

4. I am passionate about elephants and I have devoted my career to their care. I am committed to maintaining the health and welfare of the population of elephants at the L.A. Zoo and would do nothing to jeopardize their safety and well-being.

5. The L.A. Zoo has a written Elephant Management Program Procedure Manual (the "Policy"). The Policy was instituted in 1991. A true and correct copy of the Policy is attached hereto as Exhibit 1.

6. My elephant management philosophy, which is consistent with the Policy, is to offer the elephants that reside at the L.A. Zoo the highest possible quality of life

1 while still managing them in a safe and responsible manner. To that end, the elephants
2 are managed through free contact (direct handling of the elephant while the elephant and
3 handler share the same space) and protected contact (handling of the elephant when the
4 elephant and handler do not share the same space). The training methods my staff and I
5 use to condition the elephants for certain behaviors necessary for their ease of care
6 concentrate on positive reinforcement. Elephants are not disciplined (i.e., negative
7 reinforcement) at the L.A. Zoo.
8

9 7. The L.A. Zoo currently has one elephant on exhibit, a 22 year old Asian
10 male named Billy. Billy currently resides in a temporary enclosure while the L.A.
11 Zoo's new elephant exhibit, Pachyderm Forest, is constructed. The current temporary
12 exhibit includes an 8,865 square foot outdoor yard with a wading pool and shade area
13 and an 830 square foot indoor barn, both of which exceed the American Zoos and
14 Aquariums Standards for Elephant Management and Care.

15 8. Billy is exercised daily, he is provided a variety of enrichment activities,
16 and his health is constantly monitored. Every effort is made to provide Billy a healthy,
17 active and enriching experience as a resident of the L.A. Zoo. Billy is a healthy,
18 vibrant, alert and curious elephant.

19 9. Billy is never mistreated. He is cared for with love, compassion, dignity
20 and respect by myself and my staff. I would never tolerate any abusive behavior toward
21 Billy or any other elephant under my care. At no time since I have been the elephant
22 manager at the L.A. Zoo have any of the L.A. Zoo's elephant inhabitants been
23 mistreated. None have ever been deprived of food, water, or rest as a method of
24 discipline, nor disciplined through means of electricity, physical punishment resulting in
25 damage, scarring, or breakage of skin, insertion of any instrument into any bodily
26 orifice, the use of martingales, or the use of block and tackle. I have never engaged in,
27 accepted, condoned or excused any abusive behavior towards elephants.
28


1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

10. In the 27 years I have worked at the L.A. Zoo, most of that time at the elephant exhibit, I have known one employee ever to engage in any inappropriate behavior toward an elephant. That employee was Scott Riddle, and he left the L.A. Zoo over twenty years ago. I don't believe any abusive treatment towards elephants is acceptable, and at the time I witnessed the abuse more than twenty years ago, I reported it to my superiors. However, to offer some perspective on what I observed and certainly not to excuse it, elephant management philosophies twenty years ago were not the same as they are today. Twenty years ago, abusive discipline methods towards elephants was unacceptable to most reputable elephant handlers, today it is unacceptable to every reputable elephant handler.

11. Billy exhibits a head bob, for which there is disagreement among elephant experts as to the cause. Some experts characterize it as stereotypic behavior and others as a pacifying behavior. Notwithstanding how the behavior is characterized, it is one that Billy developed as a young calf before he arrived at the L.A. Zoo.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 18 day of January, 2008, at Los Angeles, California



Jeffrey A. Briscoe