

From: [Gibbens, Robert - APHIS](#)
To: [Frederick, Mandi M - APHIS](#)
Cc: [Dunigan, Anne H - APHIS](#); [Goldentyer, Betty J - APHIS](#); [Rhyner, Aaron A - APHIS](#); [Cole, Dana J - APHIS](#); [McKinnie, Carolyn - APHIS](#)
Subject: FW: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20
Date: Friday, December 20, 2019 10:02:56 AM
Attachments: [Commerford 12.pdf](#)
[Commerford 11.pdf](#)
[Commerford 10.pdf](#)
[Commerford 9.pdf](#)
[Commerford 8.pdf](#)
[Commerford 7.pdf](#)
[Commerford 6.pdf](#)
[Commerford 5.pdf](#)
[Commerford 4.pdf](#)
[Commerford 3.pdf](#)
[Commerford 2.pdf](#)
[Commerford 1.pdf](#)
[image001.png](#)

Hi Mandi. Answers to the question are below. We were able to pull the last 3 years of inspection reports before ACIS went down. ACIS is being worked on but remains unavailable, and we don't know when it will come back up. As soon as it does, we'll forward the remaining inspection reports. Let me know if there are additional questions. Thanks.....Bob

Thanks.....Bob

Robert M. Gibbens, DVM
Associate Deputy Administrator
USDA, APHIS, Animal Care
2150 Centre Avenue, Bldg. B
Ft. Collins, CO 80526
Phone: 970-494-7478
Fax: 970-472-9558



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1. What were the initial and final causes of death for elephants Karen and Beulah?

- (b) (5), DPP [REDACTED]

2. Could those deaths have been prevented?

- (b) (5), DPP [REDACTED]

(b) (5), DPP

3. What is USDA's role after unexpected exotic animal deaths?

- (b) (5), DPP

4. How does USDA ensure that the veterinarian performing the necropsy is qualified and renders an independent opinion?

- (b) (5), DPP

5. Why did Commerford Zoo continue to pass USDA inspections wider AWA despite the premature deaths of two elephants?

- (b) (5), DPP

From: Frederick, Mandi M - APHIS <mandi.m.frederick@usda.gov>

Sent: Thursday, December 19, 2019 12:04 PM

To: Dunigan, Anne H - APHIS; Needham, Christopher M - APHIS; McNally, Andrea C - APHIS

Cc: Goldberg, Ruth - APHIS; Taylor, Kimberly A - APHIS; Goldentyer, Betty J - APHIS; Anderson, Christa - APHIS

Subject: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Hi all,

I'm attaching a letter that LPA just received from Senator Blumenthal's office about Commerford Zoo in Connecticut. As you'll see, the Senator is concerned about the welfare of animals at the zoo particularly in light of the deaths of 2 elephants. He's asked 5 specific questions and asked for 9 years worth of inspection reports. The Secretary will be signing the response. Could you please read over this letter and provide guidance on how to best

respond?

Chris—I'm not sure if we need to answer each of his questions in turn. If it was an oversight letter, I'm sure we would but in this case, do we need to? And if we do need to answer each question—Anne, can AC please provide the input?

RE: Inspection reports—Andrea, can we give these out or would we need to ask the Senator to file a FOIA for them?

Since Secretary Perdue is signing this letter, we need to move it rather quickly so if you could **please get me your input by tomorrow at noon**, that would be great. I should also note that I'm looping in others in LPA b/c I will be on leave next week so someone else is likely to draft or take over this response.

Thank you!

Mandi M. Frederick
Writer/Editor--Executive Communications
Legislative and Public Affairs
APHIS-USDA
4700 River Rd., Unit 49
Riverdale, MD 20737
2A02.30
(301) 851-4095



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: **1940**
Certificate: **16-C-0006**
Site: 001
R W COMMERFORD & SONS INC

Type: FOCUSED INSPECTION
Date: 17-OCT-2019

No non-compliant items identified during this focused inspection.

This inspection and exit interview were conducted with a representative of the licensee.

Asian Elephant: Minnie

Additional Inspectors

Gladue Paula, Veterinary Medical Officer

Prepared By:

BALTRUSH JAN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:
03-NOV-2019

Received By:

TIM COMMERFORD

Title: VICE PRESIDENT

Date:
04-NOV-2019



Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	001	R W COMMERFORD & SONS INC	17-OCT-19

Count	Scientific Name	Common Name
000001	<i>Elephas maximus</i>	ASIAN ELEPHANT
000001	Total	



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: **1940**
Certificate: **16-C-0006**
Site: TRA 2
GREEN UNIT

Type: ROUTINE INSPECTION
Date: 21-AUG-2019

This inspection was conducted at the Dutchess Co Fair - Rhinebeck, NY.

No non-compliant items identified during this inspection.

This inspection and exit interview were conducted with the licensee.

Prepared By:

BALTRUSH JAN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:
23-AUG-2019

Received By:

DARLEEN COMMERFORD - TREASURER

Title: SENT VIA EMAIL

Date:
23-AUG-2019



Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 2	GREEN UNIT	21-AUG-19

Count	Scientific Name	Common Name
000001	<i>Bos primigenius indicus</i>	ZEBU
000005	<i>Camelus dromedarius</i>	DROMEDARY CAMEL
000011	<i>Capra hircus</i>	DOMESTIC GOAT
000002	<i>Dolichotis patagonum</i>	PATAGONIAN CAVY / MARA
000001	<i>Hystrix cristata</i>	AFRICAN CRESTED PORCUPINE
000002	<i>Lama glama</i>	LLAMA
000002	<i>Lama pacos</i>	ALPACA
000001	<i>Oryx dammah</i>	SCIMITAR-HORNED ORYX
000012	<i>Ovis aries aries</i>	SHEEP INCLUDING ALL DOMESTIC BREEDS
000037	Total	



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: **1940**

Certificate: **16-C-0006**

Site: 001

R W COMMERFORD & SONS INC

Type: ROUTINE INSPECTION

Date: 29-APR-2019

No non-compliant items identified during this inspection.

This inspection and exit interview were conducted with the licensee.

Prepared By:

BALTRUSH JAN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:

03-MAY-2019

Received By:

DARLENE COMMERFORD - TREASURER

Title: SENT VIA EMAIL

Date:

03-MAY-2019



Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	001	R W COMMERFORD & SONS INC	29-APR-19

Count	Scientific Name	Common Name
000005	<i>Bos primigenius indicus</i>	ZEBU
000007	<i>Camelus dromedarius</i>	DROMEDARY CAMEL
000050	<i>Capra hircus</i>	DOMESTIC GOAT
000003	<i>Dolichotis patagonum</i>	PATAGONIAN CAVY / MARA
000001	<i>Elephas maximus</i>	ASIAN ELEPHANT
000001	<i>Equus quagga</i>	BURCHELL'S / GRANT'S / CHAPMAN'S / PLAINS ZEBRA
000001	<i>Giraffa camelopardalis</i>	GIRAFFE
000001	<i>Hystrix cristata</i>	AFRICAN CRESTED PORCUPINE
000004	<i>Lama glama</i>	LLAMA
000001	<i>Lama pacos</i>	ALPACA
000006	<i>Lemur catta</i>	RING-TAILED LEMUR
000003	<i>Oryctolagus cuniculus</i>	DOMESTIC RABBIT / EUROPEAN RABBIT
000001	<i>Oryx dammah</i>	SCIMITAR-HORNED ORYX
000001	<i>Osphranter rufus</i>	RED KANGAROO
000100	<i>Ovis aries aries</i>	SHEEP INCLUDING ALL DOMESTIC BREEDS
000185	Total	



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: **1940**
Certificate: **16-C-0006**
Site: 001
R W COMMERFORD & SONS INC

Type: **FOCUSED INSPECTION**
Date: **05-MAR-2019**

This was a focused inspection to address a complaint.

No non-compliant items identified during this inspection.

This inspection and exit interview were conducted with the licensee.

Additional Inspectors

Gladue Paula, Veterinary Medical Officer

Prepared By:

BALTRUSH JAN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:
08-MAR-2019

Received By:

DARLENE COMMERFORD - TREASURER

Title: SENT VIA EMAIL

Date:
08-MAR-2019



Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	001	R W COMMERFORD & SONS INC	05-MAR-19

Count	Scientific Name	Common Name
000002	<i>Elephas maximus</i>	ASIAN ELEPHANT
000001	<i>Loxodonta africana</i>	AFRICAN ELEPHANT
000003	Total	



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: **1940**
Certificate: **16-C-0006**
Site: TRA 1
RED UNIT

Type: ROUTINE INSPECTION
Date: 19-SEP-2018

No non-compliant items identified during this inspection.

This inspection was conducted at the Big E, West Springfield, MA.

This inspection and exit interview were conducted with the licensee.

Prepared By:

BALTRUSH JAN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:
23-SEP-2018

Received By:

DARLENE COMMERFORD - TREASURER

Title: SENT VIA EMAIL

Date:
23-SEP-2018



Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 1	RED UNIT	19-SEP-18

Count	Scientific Name	Common Name
000003	<i>Bos primigenius indicus</i>	ZEBU
000014	<i>Capra hircus</i>	DOMESTIC GOAT
000001	<i>Elephas maximus</i>	ASIAN ELEPHANT
000001	<i>Equus quagga</i>	BURCHELL'S / GRANT'S / CHAPMAN'S / PLAINS ZEBRA
000002	<i>Lama glama</i>	LLAMA
000001	<i>Oryx dammah</i>	SCIMITAR-HORNED ORYX
000014	<i>Ovis aries aries</i>	SHEEP INCLUDING ALL DOMESTIC BREEDS
000036	Total	



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: **1940**
Certificate: **16-C-0006**
Site: TRA 2
GREEN UNIT

Type: ROUTINE INSPECTION
Date: 19-SEP-2018

No non-compliant items identified during this inspection.

This inspection was conducted at the Big E, West Springfield, MA.

This inspection and exit interview were conducted with the licensee.

Prepared By:

BALTRUSH JAN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:
23-SEP-2018

Received By:

DARLENE COMMERFORD - TREASURER

Title: SENT VIA EMAIL

Date:
23-SEP-2018



Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 2	GREEN UNIT	19-SEP-18

Count	Scientific Name	Common Name
000002	<i>Bos primigenius indicus</i>	ZEBU
000005	<i>Camelus dromedarius</i>	DROMEDARY CAMEL
000013	<i>Capra hircus</i>	DOMESTIC GOAT
000001	<i>Elephas maximus</i>	ASIAN ELEPHANT
000002	<i>Lama glama</i>	LLAMA
000003	<i>Lemur catta</i>	RING-TAILED LEMUR
000001	<i>Osphranter rufus</i>	RED KANGAROO
000018	<i>Ovis aries aries</i>	SHEEP INCLUDING ALL DOMESTIC BREEDS
000045	Total	



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: **1940**

Certificate: **16-C-0006**

Site: 001

R W COMMERFORD & SONS INC

Type: ROUTINE INSPECTION

Date: 21-FEB-2018

No non-compliant items identified during this inspection.

This inspection and exit interview were conducted with a representative of the licensee.

Prepared By:

BALTRUSH JAN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:

23-FEB-2018

Received By:

DARLENE COMMERFORD - TREASURER

Title: SENT VIA EMAIL

Date:

23-FEB-2018



Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	001	R W COMMERFORD & SONS INC	21-FEB-18

Count	Species
000001	AFRICAN CRESTED PORCUPINE
000001	AFRICAN ELEPHANT
000001	ALPACA
000001	ASIATIC WATER BUFFALO
000001	GIRAFFE
000001	PATAGONIAN CAVY / MARA
000001	RED KANGAROO
000001	SCIMITAR-HORNED ORYX
000002	ASIAN ELEPHANT
000003	DOMESTIC PIG / POTBELLY PIG / MICRO PIG
000004	DROMEDARY CAMEL
000005	LLAMA
000006	ZEBU
000007	RING-TAILED LEMUR
000077	DOMESTIC GOAT
000077	SHEEP INCLUDING ALL DOMESTIC BREEDS
000189	Total



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: **1940**
Certificate: **16-C-0006**
Site: TRA 2
GREEN UNIT

Type: ROUTINE INSPECTION
Date: 20-SEP-2017

No non-compliant items identified during this inspection.

This inspection and exit interview were conducted with the licensee.

This inspection was conducted at the Eastern States Fair, Springfield, MA.

Prepared By:

BALTRUSH JAN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:
03-OCT-2017

Received By:

DARLENE COMMERFORD

Title: SENT VIA EMAIL

Date:
03-OCT-2017



Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 2	R W COMMERFORD & SONS INC	20-SEP-17

Count	Species
000001	AFRICAN ELEPHANT
000001	RED KANGAROO
000002	LLAMA
000002	ZEBU
000004	DROMEDARY CAMEL
000012	DOMESTIC GOAT
000015	SHEEP INCLUDING ALL DOMESTIC BREEDS
000037	Total



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: **1940**

Certificate: **16-C-0006**

Site: TRA 1

RED UNIT

Type: ROUTINE INSPECTION

Date: 20-SEP-2017

No non-compliant items identified during this inspection.

This inspection and exit interview were conducted with the licensee.

This inspection was conducted at the Eastern States Fair, Springfield, MA.

Prepared By:

BALTRUSH JAN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:

03-OCT-2017

Received By:

DARLENE COMMERFORD

Title: SENT VIA EMAIL

Date:

03-OCT-2017



Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 1	R W COMMERFORD & SONS INC	20-SEP-17

Count	Species
000001	ALPACA
000001	ASIAN ELEPHANT
000001	COMMON ZEBRA / BURCHELL'S ZEBRA / GRANT'S ZEBRA / CHAPMAN'S ZEBRA / PLAINS ZEBRA
000001	SCIMITAR-HORNED ORYX
000002	LLAMA
000002	ZEBU
000015	DOMESTIC GOAT
000019	SHEEP INCLUDING ALL DOMESTIC BREEDS
000042	Total



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: **1940**
Certificate: **16-C-0006**
Site: TRA 2
GREEN UNIT

Type: ROUTINE INSPECTION
Date: 08-SEP-2017

There were no non-compliant items identified during the inspection.

NOTE – Inspection conducted at the North Haven Fairgrounds in North Haven, CT. African elephant inspected: Karen. Exit briefing held 9/8/17 on-site with Licensee. Report delivered by e-mail 9/10/17.

END OF REPORT

Prepared By:

GLADUE PAULA, V M D USDA, APHIS, Animal Care

Title: VETERINARY MEDICAL OFFICER 1054

Date:
10-SEP-2017

Received By:

TIM COMMERFORD - LICENSEE

Title: REPORT DELIVERED BY EMAIL 9/10/17

Date:
10-SEP-2017



Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 2	R W COMMERFORD & SONS INC	08-SEP-17

Count	Species
000001	AFRICAN ELEPHANT
000001	DROMEDARY CAMEL
000002	Total



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: **1940**
Certificate: **16-C-0006**
Site: 001
R W COMMERFORD & SONS INC

Type: FOCUSED INSPECTION
Date: 02-MAY-2017

2.40(b)(2)

ATTENDING VETERINARIAN AND ADEQUATE VETERINARY CARE (DEALERS AND EXHIBITORS).

During this inspection only one elephant ("Beulah") was present. While looking over her nails, foot pads, and cuticles it was noted that her cuticles were in need of attention. The cuticles were long and jagged and needed to be trimmed. We reviewed their vet care log and it was documented that her toe nails and pads were trimmed on March 21, 2017. However, there is no documentation about the cuticles being addressed. To ensure her health and prevent any injuries this situation will need to be addressed.

***To Be Corrected By: May 8, 2017

An exit interview was conducted with a representative of the licensee.

Additional Inspectors

Gladue Paula, Veterinary Medical Officer

Prepared By:

BALTRUSH JAN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:
05-MAY-2017

Received By:

DARLENE COMMERFORD - TREASURER

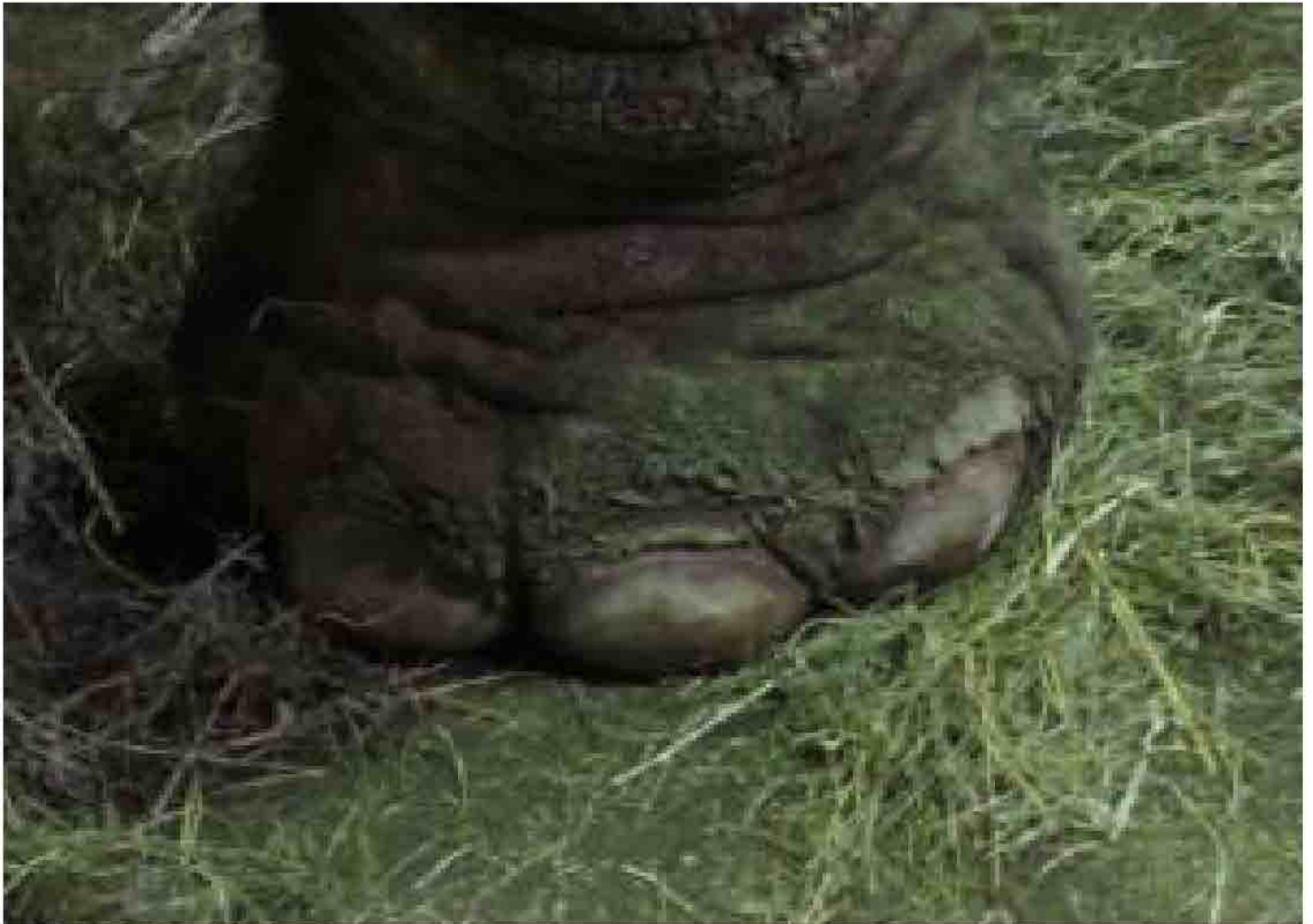
Title: SENT VIA EMAIL

Date:
05-MAY-2017



Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	001	R W COMMERFORD & SONS INC	02-MAY-17

Count	Species
000001	ASIAN ELEPHANT
000001	Total



CFR : 2.40(b)(2)

Photographer: PGLADUE

Date and Time: 02-MAY-17 11:16 AM EDT

Inspection No: 2016082568270042

Description:

5th pic: "Beulah" left front foot. Note long jagged overgrown cuticles.

Certificate: 16-C-0006

Legal Name:

**R W COMMERFORD &
SONS INC**



CFR : 2.40(b)(2)

Photographer: PGLADUE

Date and Time: 02-MAY-17 11:20 AM EDT

Inspection No: 2016082568270042

Description:

7th pic: "Beulah" close-up left rear foot with crack visible in toenail on the left. Note long jagged overgrown cuticles.

Certificate: 16-C-0006

Legal Name:

**R W COMMERFORD &
SONS INC**



CFR : 2.40(b)(2)

Photographer: PGLADUE

Date and Time: 02-MAY-17 11:14 AM EDT

Inspection No: 2016082568270042

Description:

2nd pic: "Beulah" right front view from front. Note long jagged overgrown cuticles.

Certificate: 16-C-0006

Legal Name:

**R W COMMERFORD &
SONS INC**



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: **1940**
Certificate: **16-C-0006**

Site: 001

R W COMMERFORD & SONS INC

Type: ROUTINE INSPECTION

Date: 23-MAR-2017

No non-compliant items identified during this inspection.

This inspection and exit interview were conducted with the licensee.

Prepared By:

BALTRUSH JAN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:
23-MAR-2017

Received By:

DARLENE COMMERFORD - TREASURER

Title: SENT VIA EMAIL

Date:
23-MAR-2017



Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	001	R W COMMERFORD & SONS INC	23-MAR-17

Count	Species
000001	AFRICAN CRESTED PORCUPINE
000001	AFRICAN ELEPHANT
000001	ALPACA
000001	ASIATIC WATER BUFFALO
000001	COMMON ZEBRA / BURCHELL'S ZEBRA / GRANT'S ZEBRA / CHAPMAN'S ZEBRA / PLAINS ZEBRA
000001	DONKEY / BURRO / ASS
000001	GIRAFFE
000001	RED KANGAROO
000001	SCIMITAR-HORNED ORYX
000002	ASIAN ELEPHANT
000002	CATTLE / COW / OX / WATUSI
000002	PATAGONIAN CAVY / MARA
000004	LLAMA
000004	ZEBU
000006	DOMESTIC DROMEDARY CAMEL
000007	RING-TAILED LEMUR
000047	DOMESTIC GOAT
000068	SHEEP INCLUDING ALL DOMESTIC BREEDS
000151	Total

From: [McKinnie, Carolyn - APHIS](#)
To: [Benson, Amy V - APHIS](#)
Cc: [APHIS-AnimalCare](#)
Subject: AC19-587 complaint response
Date: Tuesday, December 3, 2019 2:21:23 PM
Attachments: [AC19-587 Commerfords 10.19 JB cjm signed.docm](#)

Hi Amy,

I'm unsure if you already closed this. If not, please close this complaint.

Thank you, Carolyn

Carolyn J McKinnie, DVM
Acting Director, AWO
Animal Care, APHIS, USDA
(740) 816-8363



USDA-APHIS-Animal Care



ANIMAL WELFARE COMPLAINT			
Complaint No. AC19-587	Date Entered: 23-Sep-19	Processed By: AVB	
Referred To: Baltrush / Hadjis		Reply Due: 25-Oct-19	
Facility or Person Complaint Filed Against			
Name: R W Commerford & Sons Inc		Customer No.: 1940	License No.: 16-C-0006
Address: PO Box 188		Email Address: darlenecommerford@msn.com	
City: Goshen	State: CT	Phone No.: (860) 491-3421	
Complainant Information			
Name: (b) (6), (b) (7) / Anonymous		Organization:	
Address:		Email Address: (b) (6), (b) (7)(C), (b) (7)(D)	
City:	State:	Phone No.: (b) (6), (b) (7)(C), (b) (7)(D)	
How was the Complaint received? Email			
Details of Complaint: SEE ATTACHED			
Results: <p>*Complainant was concerned that Beulah is sick and maltreated – Based on the review of medical records and according to attending veterinarian and licensee statements, USDA was not able to determine that there was evidence that Beulah was showing any signs of illness or that she was maltreated. According to the Attending Veterinarian, Beulah was in good condition prior to travel to the Big E.</p> <p>*Complainant was concerned that Beulah was lying down – Photograph provided by complainant showed Beulah lying down on a slightly inclined grassy area. Beulah's handler is also seen in the photo right near her head. Licensee stated, lying down on grass as seen in that photo was not an unusual behavior for Beulah.</p> <p>*Complainant was concerned that she was thin for an elephant – According to the attending veterinarian she was in good body condition and she was not thin.</p> <p>*Complainant was concerned that there was no food or water present – Licensee stated that Beulah had access to fresh hay throughout the day and was provided grain twice a day. Licensee stated that fresh water was provided to the elephant via a hose. When Beulah was thirsty she would pick up the hose and the Licensee or handler would turn the water on and she had unlimited access to the water until she dropped the hose.</p>			



USDA-APHIS-Animal Care



*Complainant was concerned that there was urine soaked hay in the pen –

In the photos there is hay present. However, it cannot be determined from the photos if the hay was urine soaked or not. Licensee stated that Beulah was provided with fresh hay throughout the day and there was no need for her to eat hay that was contaminated by urine.

*Complainant was concerned that Beulah was drooling from the mouth –

According to the licensee and the attending veterinarian, Beulah did drool on occasion but there was no medical condition to cause the drooling.

*Complainant was concerned that she collapsed 3 times and they forced her back up –

According to the licensee on the day she died, Beulah went down twice, within a minute to a minute and a half. The second time she went down she did not get back up. The licensee states that he did not force her to get back up either time she went down, nor was any type of equipment available or used to force her to get back up.

*Complainant was concerned that she was covered up and taken out with a bucket truck –

Licensee confirmed that yes, Beulah was covered up after her death. This incident happened in the morning, just as the fair was opening. Licensee recounted that steps were taken to place visual and physical barriers around the trailers and the area where Beulah was located (including the use of a tarp to cover her), and the public area of the fairground. Once the fairgrounds were closed for the day, equipment was used to place slings to support, then carefully lift and place her body onto a truck.

*Complainant was concerned that Karen had died in March 2019 and it was not reported –

Licensee had informed USDA several months prior to March 2019 that Karen was under the care of the Attending Veterinarian for a medical condition, which was confirmed by USDA by review of medical records. Licensee also contacted USDA on the same day that Karen died to report that she had passed.

*Complainant is concerned that Minnie is in clear danger –

USDA inspectors have recently seen Minnie, and she was not showing any abnormal behaviors and looked in good condition. According to the Licensee she is acting normally and is eating very well.

*Complainant was concerned that the elephants are experiencing physical and psychological harm from the use of the bullhook –

The inspectors did not observe any evidence that physical or psychological harm had been done to Minnie at the time of inspection.

*Complainant was concerned that the elephant is being housed in unsuitable and unsanitary conditions. They are in a windowless indoor space and on concrete floors –

The complaint did not identify a specific location or venue for this allegation. The following pertains to the elephant housing facility at the home site. USDA confirmed that the elephant pen inside the barn at the home site was clean and sanitary at the time of the inspection. Licensee stated that the pen is cleaned two or more times throughout the day. There are windows in the walls of the elephant pen in the barn as well as windows in the large door to the barn. The floor of the elephant pen is concrete equipped with temperature-controlled radiant heating. Licensee stated that the elephant is provided access to an outdoor enclosure containing natural vegetation on a daily basis; access and length of time in the outdoor enclosure is dependent on the weather conditions.



USDA-APHIS-Animal Care



Application Kit Provided: Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>	
Inspector: Jan Baltrush	Date: 4-Nov-19
Reviewed By: Carolyn McKinnie, Acting AD	Date: 8-Nov-19

From: [McKinnie, Carolyn - APHIS](#)
To: [Benson, Amy V - APHIS](#)
Cc: [APHIS-AnimalCare](#)
Subject: FW: AC19-587 complaint response
Date: Tuesday, December 3, 2019 2:26:01 PM
Attachments: [AC19-587 Commerfords 10.19 JB cjm signed.docm](#)
[AC19-587 Commerfords 10.19.pdf](#)

Adding the original complaint.

Thanks Carolyn

From: McKinnie, Carolyn - APHIS
Sent: Tuesday, December 3, 2019 11:21 AM
To: Benson, Amy V - APHIS <amy.v.benson@usda.gov>
Cc: APHIS-AnimalCare <AnimalCare@usda.gov>
Subject: AC19-587 complaint response

Hi Amy,

I'm unsure if you already closed this. If not, please close this complaint.

Thank you, Carolyn

Carolyn J McKinnie, DVM
Acting Director, AWO
Animal Care, APHIS, USDA
(740) 816-8363



USDA-APHIS-Animal Care



ANIMAL WELFARE COMPLAINT			
Complaint No. AC19-587	Date Entered: 23-Sep-19	Processed By: AVB	
Referred To: Baltrush / Hadjis		Reply Due: 25-Oct-19	
Facility or Person Complaint Filed Against			
Name: R W Commerford & Sons Inc		Customer No.: 1940	License No.: 16-C-0006
Address: PO Box 188		Email Address: darlenecommerford@msn.com	
City: Goshen	State: CT	Phone No.: (860) 491-3421	
Complainant Information			
Name: (b) (6), (b) (7) / Anonymous		Organization:	
Address:		Email Address: (b) (6), (b) (7)(C), (b) (7)(D)	
City:	State:	Phone No.: (b) (6), (b) (7)(C), (b) (7)(D)	
How was the Complaint received? Email			
Details of Complaint: <u>SEE ATTACHED</u>			
Results: *Complainant was concerned that Beulah is sick and maltreated – Based on the review of records and speaking with the Licensee, there was no evidence that Beulah was showing any signs of illness or that she was maltreated. According to the Attending Veterinarian, Beulah was in good condition. *Complainant was concerned that Beulah was lying down – Photograph provided by complainant showed Beulah lying down on a slightly inclined grassy area. Beulah's handler is also seen in the photo right near her head. According to the licensee, lying down on grass as seen in that photo was not an unusual behavior for Beulah. *Complainant was concerned that she was thin for an elephant – According to the attending veterinarian she was in very good condition and she was not thin. *Complainant was concerned that there was no food or water present – Beulah had access to fresh hay throughout the day and was provided grain twice a day. Fresh water was provided to the elephant via a hose. When Beulah was thirsty she would pick up the hose and the Licensee would turn the water on. She had unlimited access to the water until she dropped the hose. *Complainant was concerned that there was urine soaked hay in the pen –			



USDA-APHIS-Animal Care



In the photos there is hay present. However, it cannot be determined from the photos if the hay was urine soaked or not. Beulah was provided with fresh hay throughout the day. There was no need for her to eat hay that was contaminated by urine.

*Complainant was concerned that Beulah was drooling from the mouth –

According to the licensee and the attending veterinarian, Beulah did drool on occasion but there was no medical condition to cause the drooling.

*Complainant was concerned that she collapsed 3 times and they forced her back up –

According to the licensee, Beulah went down twice, within a minute to a minute and a half. The second time she went down she did not get back up. The licensee did not force her to get back up, nor was any type of equipment available or used to force her to get back up.

*Complainant was concerned that she was covered up and taken out with a bucket truck –

Yes, Beulah was covered up after her death. This incident happened in the morning, just as the fair was opening. Steps were taken by the Licensee to place visual and physical barriers around the trailers and the area where Beulah was located (including the use of a tarp to cover her), and the public area of the fairground. Once the fairgrounds were closed for the day, equipment was used to place slings to support, then carefully lift and place her body onto a truck.

*Complainant was concerned that Karen had died in March 2019 and it was not reported –

Licensee had informed USDA several months prior to March 2019 that Karen was under the care of the Attending Veterinarian for a medical condition. Licensee also contacted USDA on the same day that Karen died to report that she had passed.

*Complainant is concerned that Minnie is in clear danger –

Inspectors have recently seen Minnie, she was not showing any abnormal behaviors and looked in good condition. According to the Licensee she is acting normally and is eating very well.

*Complainant was concerned that the elephants are experiencing physical and psychological harm from the use of the bullhook –

The inspectors did not observe any evidence that physical or psychological harm had been done to the elephant.

*Complainant was concerned that the elephant is being housed in unsuitable and unsanitary conditions. They are in a windowless indoor space and on concrete floors –

The elephant pen inside the barn was clean and sanitary at the time of the inspection. Licensee stated that the pen is cleaned two or more times throughout the day. There are windows in the walls of the elephant pen in the barn as well as windows in the large door to the barn. The floor of the elephant pen is concrete equipped with temperature-controlled radiant heating. The elephant is provided access to an outdoor enclosure containing natural vegetation on a daily basis; access and length of time in the outdoor enclosure is dependent on the weather conditions.

Application Kit Provided:

Yes: ☐

No: ☒

Inspector:

Jan Baltrush

Date:

4-Nov-19

Reviewed By: (b) (6), (b) (7)(C)

Tonya Hadjis

Date:

6-Nov-19

From: [Cole, Heather - APHIS](#)
To: [APHIS-AnimalCare](#)
Subject: FW: FY19 Complaint Log
Date: Friday, March 20, 2020 5:47:03 PM
Attachments: [FY19- Complaint Log.xlsx](#)
[AC19-181 Loren and Lloyd Yoder.docm](#)

I am forwarding the completed complaint form for AC19-181. Could you please update the log to close it out. Thank you!

Heather

NON-RESPONSIVE RECORD





USDA-APHIS-Animal Care



ANIMAL WELFARE COMPLAINT			
Complaint No. AC19-181	Date Entered: 15-Mar-19	Processed By: SSE	
Referred To: Ranslem/Cole		Reply Due: 16-Apr-19	
Facility or Person Complaint Filed Against			
Name: Clayton Yoder	Customer No.: 12503	License No.: 42-A-0823	
Address: 4408 C R 7480		Email Address:	
City: WEST PLAINS	State: MO	Phone No.: (319) 383-6055	
Complainant Information			
Name: (b) (6), (b) (7)(C)		Organization:	
Address:		Email Address: (b) (6), (b) (7)(C)	
City:	State:	Phone No.: (b) (6), (b) (7)(C)	
How was the Complaint received? Email			
Details of Complaint: SEE ATTACHED			
Results: This complaint should refer to Lauren and Lloyd Yoder CID 505580, not "Clayton" and Lloyd Yoder. A full inspection of the facility was conducted on April 16, 2019. The inspection included vet care, lighting, and living conditions required under the Animal Welfare Act. No non-compliant items were identified during this inspection. Animal Care will continue to monitor this facility for compliance with the Animal Welfare Act. END			
Application Kit Provided: Yes: <input type="checkbox"/> No: <input type="checkbox"/>			
Inspector: Corbin Ranslem		Date: 16-Apr-19	
Reviewed By: Heather Cole		Date: 24-May-19	

From: [Goldentyer, Betty J - APHIS](#)
To: [McKinnie, Carolyn - APHIS](#); [Gibbens, Robert - APHIS](#); [Dunigan, Anne H - APHIS](#)
Cc: [Whisenton, Katie M - APHIS](#); [Cole, Dana J - APHIS](#)
Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20
Date: Friday, December 20, 2019 8:37:00 AM

Thanks Carolyn,

I think we're ready to send this back to Mandi. Did we get the whole 9 years of inspections together?

Thanks

Betty

From: McKinnie, Carolyn - APHIS
Sent: Thursday, December 19, 2019 11:11 PM
To: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>; Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>
Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>
Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Hi Bob,

Here's what I have compiled based on input from Paula Gladue, Jan Baltrush and Tonya Hadjis. I've added directly to the questions below.

For additional context if needed, I've attached memo's from Paula Gladue and Jan Baltrush, two recent complaint responses involving the Commerford elephants as well as previous emails responding to questions from Blumenthal's office (via Anne Dunigan).

Jan noted that Blumenthal's letter states that the Commerfords have been licensed since May 2000. This is incorrect as she has been inspecting them since Oct. 1988 and they were licensed prior to that. Based on the Commerford's license # 16-C-0006, she believes that they were the sixth exhibitor to get a license back in 1970.

Please let me know if anything needs to be clarified. I'll check my email first thing tomorrow morning in case you have any other questions.

Thanks, Carolyn

From: Gibbens, Robert - APHIS
Sent: Thursday, December 19, 2019 10:18 AM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>; Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>
Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>
Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Great -- here's a start. Thanks.

1. What were the initial and final causes of death for elephants Karen and Beulah?

- (b) (5), DPP [REDACTED]

2. Could those deaths have been prevented (b) (5), DPP

- (b) (5), DPP [REDACTED]

3. What is USDA's role after unexpected exotic animal deaths?

- (b) (5), DPP [REDACTED]

4. How does USDA ensure that the veterinarian performing the necropsy is qualified and renders an independent opinion?

- (b) (5), DPP [REDACTED]

5. Why did Commerford Zoo continue to pass USDA inspections wider AWA despite the premature deaths of two elephants?

- (b) (5), DPP [REDACTED]

From: McKinnie, Carolyn - APHIS

Sent: Thursday, December 19, 2019 11:14 AM

To: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>; Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>

Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>

Subject: Re: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Hi Bob, I will work with the inspectors on this today. As an FYI ^{(b) (6)} [REDACTED]. I am familiar with this as I worked closely with Hadjis on the 2 elephant complaint responses.
Carolyn

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From: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>

Sent: Thursday, December 19, 2019 10:04:35 AM

To: Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>

Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>; McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>

Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Never mind about my suggested deadline, just saw we need to forward by 12/20.

From: Gibbens, Robert - APHIS

Sent: Thursday, December 19, 2019 10:58 AM

To: Betty J - APHIS Goldentyer (betty.j.goldentyer@usda.gov) <betty.j.goldentyer@usda.gov>

Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>; Carolyn - APHIS McKinnie (carolyn.j.mckinnie@usda.gov) <carolyn.j.mckinnie@usda.gov>

Subject: FW: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Yes, we'll get answers to the questions from Hadjis/inspector. Do we need 10 years of inspections or 3? The deadline in the letter is January 18; if we get it to Mandi by January 7, would that be okay?

Thanks.

From: Goldentyer, Betty J - APHIS

Sent: Thursday, December 19, 2019 10:40 AM

To: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>

Subject: Fwd: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Bob

Can you get with Katie and start on this. Probably need the inspectors to answer the questions.

Thanks

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From: Frederick, Mandi M - APHIS <mandi.m.frederick@usda.gov>

Sent: Thursday, December 19, 2019 12:04 PM

To: Dunigan, Anne H - APHIS; Needham, Christopher M - APHIS; McNally, Andrea C - APHIS

Cc: Goldberg, Ruth - APHIS; Taylor, Kimberly A - APHIS; Goldentyer, Betty J - APHIS; Anderson, Christa - APHIS

Subject: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Hi all,

I'm attaching a letter that LPA just received from Senator Blumenthal's office about Commerford Zoo in Connecticut. As you'll see, the Senator is concerned about the welfare of animals at the zoo particularly in light of the deaths of 2 elephants. He's asked 5 specific questions and asked for 9 years worth of inspection reports. The Secretary will be signing the response. Could you please read over this letter and provide guidance on how to best respond?

Chris—I'm not sure if we need to answer each of his questions in turn. If it was an oversight letter, I'm sure we would but in this case, do we need to? And if we do need to answer each question—Anne, can AC please provide the input?

RE: Inspection reports—Andrea, can we give these out or would we need to ask the Senator to file a FOIA for them?

Since Secretary Perdue is signing this letter, we need to move it rather quickly so if you could **please get me your input by tomorrow at noon**, that would be great. I should also note that I'm looping in others in LPA b/c I will be on leave next week so someone else is likely to draft or take over this response.

Thank you!

Mandi M. Frederick

Writer/Editor--Executive Communications

Legislative and Public Affairs

APHIS-USDA

4700 River Rd., Unit 49

Riverdale, MD 20737

2A02.30

(301) 851-4095

From: [McKinnie, Carolyn - APHIS](#)
To: [Gibbens, Robert - APHIS](#); [Goldentyer, Betty J - APHIS](#)
Cc: [Whisenton, Katie M - APHIS](#); [Cole, Dana J - APHIS](#)
Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20
Date: Thursday, December 19, 2019 11:14:17 PM
Attachments: [Commerford Eles 10-7-19 signed PSG.pdf](#)
[12-19-19 Baltrush Commerfords Memo to Sen Blumenthal.docx](#)
[AC19-587 Commerfords 10,19 JB cjm signed.docm](#)
[AC19-592 Commerford complaint response sgnd.docm](#)
[FW Response Needed Questions about Commerford Zoo from Sen. Blumenthal.msg](#)
[FW Response Needed Questions about Commerford Zoo from Sen. Blumenthal.pdf](#)

Hi Bob,

Here's what I have compiled based on input from Paula Gladue, Jan Baltrush and Tonya Hadjis. I've added directly to the questions below.

For additional context if needed, I've attached memo's from Paula Gladue and Jan Baltrush, two recent complaint responses involving the Commerford elephants as well as previous emails responding to questions from Blumenthal's office (via Anne Dunigan).

Jan noted that Blumenthal's letter states that the Commerfords have been licensed since May 2000. This is incorrect as she has been inspecting them since Oct. 1988 and they were licensed prior to that. Based on the Commerford's license # 16-C-0006, she believes that they were the sixth exhibitor to get a license back in 1970.

Please let me know if anything needs to be clarified. I'll check my email first thing tomorrow morning in case you have any other questions.

Thanks, Carolyn

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[REDACTED]

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Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>; McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>
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Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>; Carolyn - APHIS McKinnie (carolyn.j.mckinnie@usda.gov) <carolyn.j.mckinnie@usda.gov>
Subject: FW: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

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To: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>
Subject: Fwd: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Bob

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Sent: Thursday, December 19, 2019 12:04 PM

To: Dunigan, Anne H - APHIS; Needham, Christopher M - APHIS; McNally, Andrea C - APHIS

Cc: Goldberg, Ruth - APHIS; Taylor, Kimberly A - APHIS; Goldentyer, Betty J - APHIS; Anderson, Christa - APHIS

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I'm attaching a letter that LPA just received from Senator Blumenthal's office about Commerford Zoo in Connecticut. As you'll see, the Senator is concerned about the welfare of animals at the zoo particularly in light of the deaths of 2 elephants. He's asked 5 specific questions and asked for 9 years worth of inspection reports. The Secretary will be signing the response. Could you please read over this letter and provide guidance on how to best respond?

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Thank you!

Mandi M. Frederick

Writer/Editor--Executive Communications

Legislative and Public Affairs

APHIS-USDA

4700 River Rd., Unit 49

Riverdale, MD 20737

2A02.30

(301) 851-4095

memo

To: Dr. Tonya Hadjis, Dr. Paula Gladue and Dr. Carolyn McKinnie
From: Baltrush, Jan J - APHIS
CC:
Date: 12/19/19
Re: Commerfords and Sons CID# 1940 License # 16-C-0006

This memo is in response to a letter sent to The Honorable Sonny Perdue from CT State Senator Richard Blumenthal.

The letter requests information on the elephants owned by the Commerford and Sons.

The letter states that the Commerfords have been licensed since May 2000. This is incorrect. The Commerfords license # is 16-C-0006. I have been inspecting them since Oct. 1988. They were licensed for several years before that. I would assume that they were the sixth exhibitor to get a license back in 1970.

The Commerfords had an African elephant named "Karen" since she was 3 yrs. old. In August 2018, Mr. Tim Commerford contacted USDA AC Inspector Jan Baltrush, ACI to inform her that "Karen" was not doing well. She was 37 yrs. old. They had been doing blood work to check her kidney values. They were high for an elephant. In Dec 2017, her creatine level was 2, in Aug 2018 it was up to 6. They were doing periodic blood work and it was as high as 9.4 by the time she passed. She did pass away in March 2019. During Aug 2018 and March 2019 the Commerfords, and their attending veterinarian, consulted with a variety of other elephant handlers and veterinarians. They were informed that they were finding that African elephants were dying between 36 – 38 yrs. old from kidney disease. Therefore, they changed her diet from an elephant pellet to an 8% sweet feed. She was given Gatorade, rectal enemas 3x / day, diuretics as needed along with other medications. She was continually under veterinary care. When she did pass on the premise, I was called within hours. A necropsy was not performed due to the fact that they were confident that this death was a result of kidney disease. All conversations between myself and Tim Commerford were relayed to SACS Dr. Tonya Hadjis.


The Commerfords also owned an Asian elephant named "Beulah". She was imported, and purchased by the Commerfords, when she was between 6-10 yrs. old. She was ~ 51 yrs. old when she passed. "Beulah" had an ~ 10 yr. history of having occasional blood and mucopurulent discharge in her urine. Uterine tumors were suspected. Again, their attending veterinarian consulted with other veterinarians about treatment. It was suggested that they only treat her when symptoms were observed. This is what was done. She was observed on a daily basis to assess her appetite, behavior and any signs of pain. "Beulah" was not showing any signs of discomfort before the Big E fair started so they decided to bring her along. She was not doing any rides, or performances per se, she just stood by the handler while they did an educational presentation about elephants. People were also allowed to take photos with her. The morning she passed, she was not eating her hay so the owner brought her behind the trailers to eat some green grass. She was there for a bit until she went down, got ½ way back up, and then went down again. Tim Commerford had the fairground vet at his petting zoo within 5 minutes. He pronounced her dead. Tim Commerford immediately called his attending vet and then myself within ½ hr. of this happening. I received the message later that day (because it was a Sunday), but immediately called Tim. Then left a message for SACS Dr. Tonya Hadjis. Due to the fact that they did not know why "Beulah" had this episode they conducted a necropsy. This was performed by their attending vet, (b) (6), (b) (7)(C) their previous attending vet, (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C). For the next few days, I was in constant contact with Tim, (b) (6), (b) (7)(C) and Dr. Hadjis.

In regards to the specific questions asked by Sen. Blumenthal.

- (b) (5), DPP [REDACTED]
- Could those deaths have been prevented?
(b) (5), DPP [REDACTED]
- What is USDA's role after unexpected exotic animal deaths?
(b) (5), DPP [REDACTED]
- How does USDA ensure that the veterinarian performing the necropsy is qualified and renders an independent opinion?
(b) (5), DPP [REDACTED]


- Why did Commerford Zoo continue to pass USDA inspections under AWA despite the premature deaths of two elephants?

(b) (5), DPP

A large rectangular area of text is completely redacted with black ink, covering approximately 10 lines of text.

- Please provide Commerford Zoo inspection reports dating back to 2010.

(b) (5), DPP

A single line of text is redacted with black ink.



USDA-APHIS-Animal Care



ANIMAL WELFARE COMPLAINT			
Complaint No. AC19-592	Date Entered: 27-Sep-19	Processed By: AVB	
Referred To: Baltrush / Hadjis		Reply Due: 29-Oct-19	
Facility or Person Complaint Filed Against			
Name: R W Commerford & Sons		Customer No.: 1940	License No.: 16-C-0006
Address: PO Box 188, Route 4		Email Address: darlenecommerford@msn.com	
City: Goshen	State: CT	Phone No.: (860) 491-3421	
Complainant Information			
Name: Bruce Sherman		Organization: CT Dept. of Agriculture	
Address: 450 Columbus Blvd. Suite 702		Email Address: Bruce.Sherman@ct.gov	
City: Hartford	State: CT	Phone No.: (860) 713-2556	
How was the Complaint received? Email			
Details of Complaint: <u>SEE ATTACHED</u>			
Results: * Complainant was concerned that Beulah was used for rides – Licensee stated that she had not been used for rides in over 2 yrs. * Complainant was concerned that Beulah had to stand on hard concrete for 12 hours a day – Licensee stated that the fairgrounds substrate at the Big E is asphalt. Licensee stated that she also had access to the grass and tree lined area, and licensee stated Beulah's handler would lead her to those areas whenever Beulah signaled in that direction, indicating that she wanted to go to the grass. * Complainant was wondering why they have not been closed down – The USDA Animal Care has an enforcement process in place to ensure that all licensed facilities comply with the AWA. In order to do that, inspectors conduct unannounced inspections and cite any deficiencies. If deficiencies remain uncorrected at subsequent inspections, APHIS considers legal action.			
Application Kit Provided: Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>			
Inspector: Jan Baltrush		Date: 8-Nov-19	
Reviewed By: Carolyn McKinnie, Acting AD		Date: 12-Nov-19	

From: McKinnie, Carolyn - APHIS []
To: Dunigan, Anne H - APHIS [anne.dunigan@usda.gov]
CC: Hadjis, Tonya - APHIS [tonya.hadjis@usda.gov]
Subject: FW: Response Needed: Questions about Commerford Zoo from Sen. Blumenthal
Date: Wednesday, October 09, 2019 10:18:19
Attachment 1: Commerford Eles 10-7-19 signed PSG.pdf
Attachment 2: Beulah Commerford.pdf
Attachment 3: Open AC19-592.pdf

Hi again Anne,

I was able to dig up some more information about the Commerford zoo last night. I've added the information below. When the SACS returns from leave I can ask her what week they plan to inspect but per complaint guidelines it must be before 10/29/19

I hope this answers your questions. If you need anything else, would you please text me at (b) (6), (b) (7)(C) so that I can try to make contact with the inspector?

Thank you, Carolyn

From: Dunigan, Anne H - APHIS <anne.dunigan@usda.gov>
Sent: Tuesday, October 8, 2019 9:49:06 AM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>; Cunningham, Debbie J - APHIS <debbie.j.cunningham@usda.gov>
Subject: Response Needed: Questions about Commerford Zoo from Sen. Blumenthal

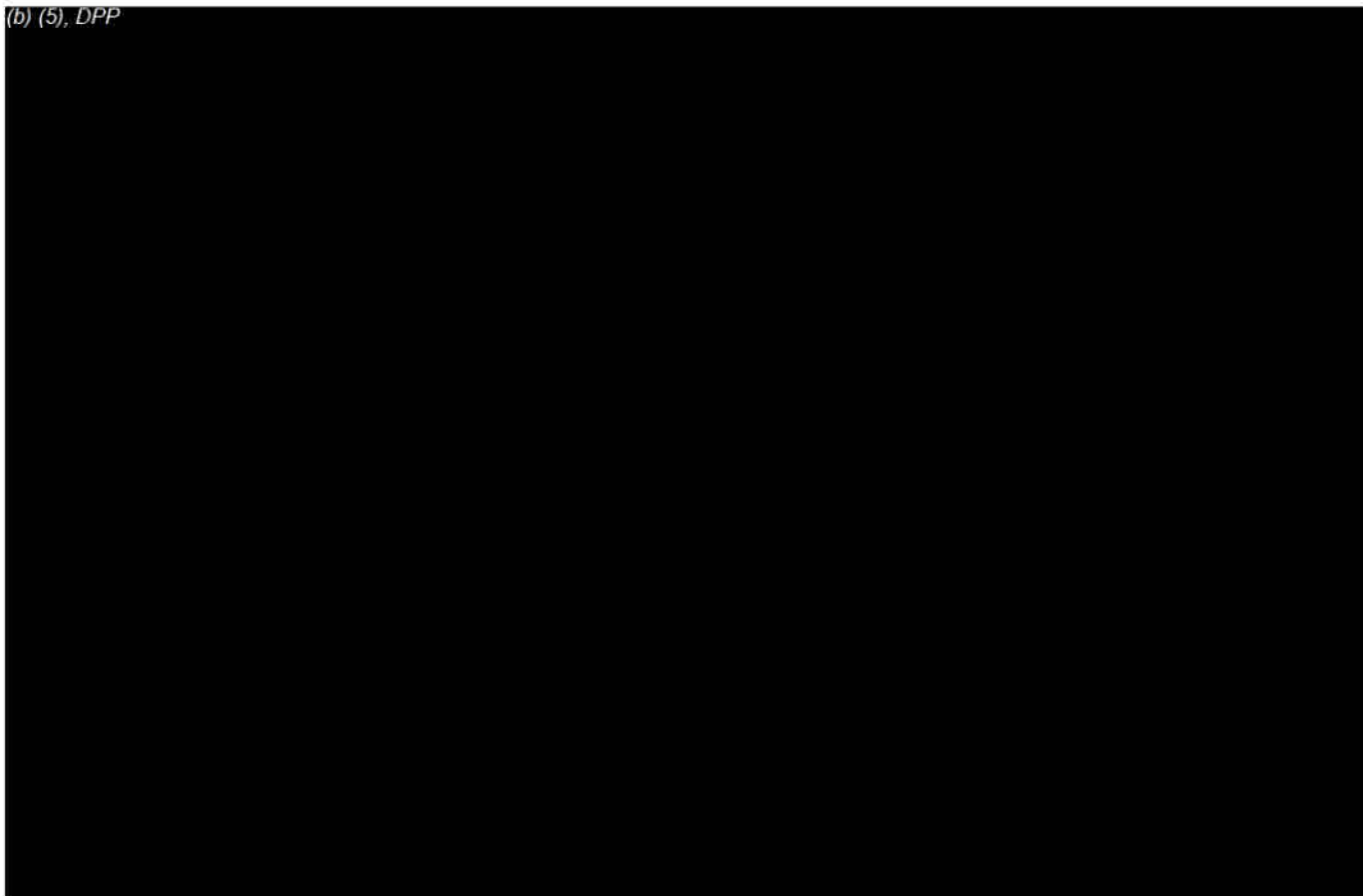
--Good morning Carolyn and Debbie--Hoping you can help me respond to Blumenthal's office.

1. What's the history of USDA inspections at Commerford?

(b) (5), DPP



(b) (5), DPP



First time on AC's radar? I can't answer for Tonya Hadjis, SACS, but elephants are very high profile animals that generate a great deal of complaints so they have been on the radar for years in that respect.

DRAFT RESPONSE: (b) (5), DPP



2. What steps did USDA take after inspections?

RESPONSE: (b) (5), DPP



RESPONSE: (b) (5), DPP



(b) (5), DPP



Feel free to call 970-494-7398. Thanks, Anne Dunigan

From: Needham, Christopher M - APHIS
Sent: Tuesday, October 08, 2019 9:27 AM
To: Dunigan, Anne H - APHIS <anne.dunigan@usda.gov>
Subject: FW: Questions about Commerford Zoo from Sen. Blumenthal

Hi Anne,

Do you have any info on the below that I can pass along to Senator Blumenthal's office?

Any previous citations? Anything out of the normal here?

Thanks!

Chris Needham

Legislative Director

USDA APHIS

202-799-7027

christopher.m.needham@usda.gov

From: Mayer, Jillian (Blumenthal) <Jillian_Mayer@blumenthal.senate.gov>
Sent: Monday, October 7, 2019 12:14 PM
To: Lee, Evan - OSEC, Washington, DC; Wong, Veronica - OSEC, Washington, DC; SM.OSEC.OCR
Cc: Kehoe, Richard (Blumenthal); Campbell, Shawn (Blumenthal); Kalonia, Maya (Blumenthal)
Subject: Questions about Commerford Zoo from Sen. Blumenthal

To whom it may concern at the USDA Office of Congressional Relations:

I'm an environment & energy staffer in Senator Richard Blumenthal's office. The Senator has questions about USDA's past contact and relationship with with Commerford Zoo. Commerford is a Connecticut-based traveling zoo that has been accused by guests of neglecting/abusing animals for several years. I'm wondering if you could connect me to someone at USDA who can help clarify USDA's authority and actions. My questions are loosely:

1. What's the history of USDA inspections at Commerford?
2. What steps did USDA take after inspections?
3. Is there an autopsy or other medical history of the recent death of Beulah the elephant?

Thanks very much for your help!

Best,

Jillian Mayer

NOAA-Sea Grant Knauss Marine Policy Fellow

US Senator Richard Blumenthal

706 Hart Senate Office Building, Washington, DC 20510

202-224-5794

Pronouns: she/her



USDA-APHIS-Animal Care



ANIMAL WELFARE COMPLAINT			
Complaint No. AC19-592	Date Entered: 27-Sep-19	Processed By: AVB	
Referred To: Baltrush / Hadjis		Reply Due: 29-Oct-19	
Facility or Person Complaint Filed Against			
Name: R W Commerford & Sons		Customer No.: 1940	License No.: 16-C-0006
Address: PO Box 188, Route 4		Email Address: darlenecommerford@msn.com	
City: Goshen	State: CT	Phone No.: (860) 491-3421	
Complainant Information			
Name: Bruce Sherman		Organization: CT Dept. of Agriculture	
Address: 450 Columbus Blvd. Suite 702		Email Address: Bruce.Sherman@ct.gov	
City: Hartford	State: CT	Phone No.: (860) 713-2556	
How was the Complaint received? Email			
Details of Complaint: <u>SEE ATTACHED</u>			
Results:			
Application Kit Provided: Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>			
Inspector:			Date:
Reviewed By:			Date:



Animal and Plant
Health Inspection
Service

Animal Care
4700 River Road
Riverdale, MD
20737

September 27, 2019

Bruce Sherman, DVM, MPH
CT Department of Agriculture
450 Columbus Blvd., Suite 702
Hartford, CT 06103
bruce.sherman@ct.gov

Dear Complainant:

Thank you for your correspondence dated 26-Sep-19. We are reviewing your concerns and assigned tracking number AC19-592. Please allow us enough time (30 to 60 days) to thoroughly look into your concerns. You may submit a request to the Animal and Plant Health Inspection Service (APHIS) Freedom of Information Act (FOIA) office to obtain any publically available information regarding our review.

FOIA requests can be submitted three ways:

1. Web Request Form: <https://efoia-pal.usda.gov/App/Home.aspx>
2. Fax: (301) 734-5941
3. U.S. Mail:
USDA-APHIS-FOIA
4700 River Road, Unit 50
Riverdale, MD 20737

Should you have any questions regarding the APHIS FOIA process or need assistance using the Web Request Form **please contact the APHIS FOIA office at 301-851-4102.**

Animal Care is a program within the U.S. Department of Agriculture (USDA) that directs activities to ensure compliance with and enforcement of the Animal Welfare Act and the Horse Protection Act. Animal Care establishes standards of humane treatment for regulated animals and monitors and achieves compliance through inspections, enforcement, education, and cooperative efforts under the Acts.

Please be assured that we will look into your concern(s) and take appropriate action(s).

Thank you for your interest into the humane treatment of these animals.

Sincerely,

Betty Goldentyer
Associate Deputy Administrator
Animal Care

From: [Hadjis, Tonya - APHIS](#)
To: [Benson, Amy V - APHIS](#)
Subject: FW: 2511321_1.pdf
Date: Friday, September 27, 2019 9:13:18 AM
Attachments: [2511321_1.pdf](#)

Good morning Amy,
Could you please file this as a complaint?

Thanks
Tonya

From: Baltrush, Jan J - APHIS
Sent: Thursday, September 26, 2019 5:57 PM
To: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Subject: Fwd: 2511321_1.pdf

Got this from State of CT. Will you add this to our complaint log?

Jan

Get [Outlook for iOS](#)

From: Sherman, Bruce <Bruce.Sherman@ct.gov>
Sent: Thursday, September 26, 2019 3:25 PM
To: Baltrush, Jan J - APHIS
Cc: Wilson, Nathan
Subject: FW: 2511321_1.pdf

Jan P. Baltrush
Inspector
USDA, APHIS, Animal Care

Hello Jan,

Bryan P. Hurlburt, Commissioner of the Connecticut Department of Agriculture, has asked that I inform you of a complaint (see attachment) regarding Cummerford's Zoo, a USDA licensed exhibitor located in Goshen, CT. The complaint was referred to this Department by the state's Office of Attorney General.

The complainant references the care provided by the Cummerford Zoo for their elephants and, specifically, opposition to exhibition of the elephants at the Eastern States Exposition (BIG E) in West Springfield, MA. The complainant also cites the death of Cummerford's elephant "Beulah" while at this year's Big E.

Will you please inform me of any follow-up actions, if any, that USDA, APHIS, Animal Care will take in response to this complaint?

Thank you,
Bruce

*BRUCE A. SHERMAN, DVM, MPH
DIRECTOR, BUREAU OF REGULATORY SERVICES
CT DEPARTMENT OF AGRICULTURE
450 COLUMBUS BLVD., SUITE 702
HARTFORD, CT 06103*

Bureau Tel. #'s: (860) 713-2504, (860) 713-2506
Direct Tel. #: (860) 713-2556
FAX #: (860) 706-5745
Email: bruce.sherman@ct.gov

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From: Wilson, Nathan <Nathan.Wilson@ct.gov>
Sent: Thursday, September 26, 2019 2:46 PM
To: Sherman, Bruce <Bruce.Sherman@ct.gov>
Subject: FW: 2511321_1.pdf

Bruce,

I spoke with Commissioner and he believes USDA should look in to this as they seem to have more authority. Can you please forward this complaint over to them and see what they say?
Thank you.

Nathan M. Wilson
Connecticut Department of Agriculture
Email: Nathan.Wilson@ct.gov
Office: 860.713.2528

CONFIDENTIAL NOTICE: This electronic message may contain information that is confidential and/or legally privileged. It is intended only for the use of the individual(s) and entity named as recipients in the message. If you are not an intended recipient of the message, please notify the sender immediately and delete the material from any computer. Do not deliver, distribute, or copy this message and do not disclose its contents or take action in reliance on the information it contains. Thank you.

From: Arenas, Sandra

Sent: Wednesday, September 25, 2019 2:44 PM

To: Wilson, Nathan <Nathan.Wilson@ct.gov>

Subject: 2511321_1.pdf

Good afternoon Nathan,

We received the attached letter from (b) (5), (b) (7)(C), (b) (7) regarding the death of Beulah, the elephant. She is requesting an investigation into R.W. Commerford & Sons. Would the Department of Agriculture look into this matter.

Thank you for any assistance you can provide.

Best,

Sandy

PI 1904110

Sept.20, 2019

Connecticut Attorney General William Tong
55 Elm St.
Hartford, CT 06106

Dear Sir:

After years of trying to entreat the Big E Exposition in West Springfield, MA to drop their relationship with the R.W. Commerford Zoo (Goshen, CT), we've received the news that their beautiful, 54 year old elephant Beulah, has died. It was inevitable, knowing about their history of mistreating their animals. (I have enclosed a 4 page fact sheet that PETA has on Commerford, listing all of their infractions through the years.) I (b) (6), (b) (7)(C) and have witnessed their "Petting Zoo" and seen the reactions of the fairgoers. Many comments included wishes that animals were outlawed in fairs and circuses, and I've seen small children crying because they "felt bad for the poor animals". They also participate in other fairs, as well as the Boars Head Festival at Trinity Lutheran Church in Springfield, MA, with their camels (and they've had a few incidents with them as well!)

The news stations that covered this awful event showed pictures of Beulah lying down on the ground. Apparently a worker was quoted allegedly saying that elephants sleep lying down! The news mentioned the elephant was "removed sometime later". Commerford also has other elephants at their "zoo" in Goshen. A local animal welfare agency mentioned they offered to send the elephants to a sanctuary where they could live out their days, but Commerford nixed that idea.

Points to consider:

- Why would anyone in their right mind use a 54 year old elephant for rides, and having them stand on the hard concrete ground for 12 hours each day, in a very small area?
- I have sent letters to Eugene Cassidy (Pres. of the Big E) with no response. I called their main office and got hung up on. I was told at one time that "The Commerford family has been friends with the Big E for years". Neither responded to news teams requests to comment on this tragedy.
- Since their infractions have been documented since the 1980's, WHY haven't they been thoroughly investigated and closed down a long time ago?
- Please go on the website "Yelp" and type in their name- you will see pages of the lowest ratings and terrible comments about the abuse/neglect that people have witnessed.
- Many animal rights/welfare groups are now confronting the issue of what should be done about the Commerford family as well as many citizens making calls and writing letters.

- Something must be done to protect the other elephants and “exotic animals” that they advertise on their website!

With all these documented actions, can you please help to put an end to this endless animal abuse by these people and stop them from ever attending another event, and close them down? For the sake of the innocent, mistreated animals? They’ve gotten away with this abuse for so many years.....


Animals are not “entertainment”- they have rights and must have access to good, humane and comfortable living conditions that are inspected and approved by an animal welfare groups, if they must be in “captivity”. Isn’t that an awful word? Captivity”. Actually, they should be in their own environments, wherever they originated from.

Please, for the sake of the animals, help close R.W.Commerford down for good.

Thanking you from all (exploited) animals, and myself,

Sincerely,

(b) (6), (b) (7)(C)



R.W. Commerford & Sons Traveling Petting Zoo

48 Torrington Rd., Goshen CT 06756

R.W. Commerford & Sons Traveling Petting Zoo has failed to meet minimal federal standards for the care of animals used in exhibition as established in the Animal Welfare Act (AWA). The U.S. Department of Agriculture (USDA) has cited R.W. Commerford & Sons numerous times for failing to provide adequate veterinary care, for failing to maintain enclosures and transport trailers, for failing to have an attendant present during periods of public contact, for improper feeding, and for poor housekeeping. An elephant from R.W. Commerford & Sons has been involved in three dangerous incidents while giving rides to children and caused injuries. Contact PETA for documentation.

May 2, 2017: The USDA cited Commerford for failing to provide Asian elephant Beulah, who was in need of foot care, with adequate veterinary care.

February 3, 2011: The USDA cited Commerford for exposing a porcupine to harm by housing him in a poorly constructed cage and for preventing the gate to the facility's perimeter fence to be closed/secured.

November 4, 2009: The USDA cited Commerford for failing to have a suitable method of rapidly eliminating excess water in an enclosure for camels. The enclosure had an accumulation of mud and water through which the camels had to walk in order to get in and out of the pen. The inspector wrote, "The standing water has been in that area for some time, indicated by the layer of algae present." Commerford was also cited for failing to maintain structurally sound enclosures to contain the animals and protect them from injury. The gate to a goat, sheep, and llama enclosure was missing a portion of a top rail, and rolls of wire mesh attached to the fencing and support poles were left within reach of the animals. Additionally, the roof of an enclosure for cows had missing shingles and damaged eaves.

February 1, 2008: Commerford advertised a yak and

a water buffalo for sale in *Animal Finders' Guide*, a trade publication that caters to exotic animal breeders and dealers, the pet trade, and hunting ranches.

January 2, 2008: The USDA cited Commerford for failing to maintain facilities in good repair because a gate for a sheep, goat, llama, and donkey enclosure had support posts with jagged edges and a bent and broken horizontal bottom rail, which posed a risk of injury to the animals.

August 8, 2007: The USDA cited Commerford for failing to provide a developed and documented environmental enhancement plan for primates.

May 26, 2007: The USDA cited Commerford for failing to handle food in a manner that would prevent contamination.

February 21, 2007: Bob Commerford testified before a Connecticut state legislative committee in opposition to proposed bill 6599, which sought to eliminate the mistreatment of captive elephants by banning the use of bullhooks, electric prods, and chains.

September 28, 2006: The USDA cited Commerford for failing to maintain a transport trailer in a way that would protect the health and ensure the safety and comfort of the animals and for failing to store food in a manner that would protect against contamination and deterioration.

August 10, 2006: The USDA cited Commerford for failing to have an employee or attendant present during periods of public contact with the animals in the petting zoo, including an elephant named Karen.

March 5, 2006: An Asian elephant named Minnie injured two Commerford employees while giving rides at the Best Western Royal Plaza Trade Center in Marlborough, Massachusetts. As children were being loaded onto the elephant, she became agitated and suddenly swung her head toward the two employees, shifting her weight and pinning them against the loading ramp. An eyewitness reported that one of the employees had provoked the elephant by striking her in the face. One man sustained a chest injury and the other a broken arm. Both were taken by ambulance to the hospital. Two bystanders sustained bruises. Minnie has been involved in at least three previous dangerous incidents. (See the August 27, 1998, and August 28, 1989, entries.)

March 4, 2006: A 4-year-old girl fell through the railing of a loading ramp while waiting to get on an elephant and camel ride at the Best Western Royal

Plaza Trade Center in Marlborough, Massachusetts. The girl fell approximately 5 feet and landed on her back among the animals. She sustained trauma to her head and was taken by ambulance to the hospital.

November 30, 2005: The USDA cited Commerford for failing to provide three elephants, who were found to have an excessive accumulation of necrotic skin on their heads, with adequate veterinary care; failing to provide goats, sheep, and llamas with adequate shelter; and failing to maintain structurally sound enclosures. The inspector noted that the Asian elephant Beulah was being treated for a foot disorder. According to *The Elephant's Foot*, captivity-induced foot problems and arthritis are the leading reasons for euthanasia of captive elephants.

August 15, 2005: The USDA cited Commerford for failing to handle animals so that there is minimal risk of harm to the animal and to the public. While giving rides, an African elephant named Karen used her trunk to reach out and touch members of the public, including a child in a stroller, while the handler was distracted talking to other employees and not observing the elephant's behavior.

February 3, 2005: Commerford was cited by the USDA for failing to maintain structurally sound enclosures, for water troughs filled with algae, and for failing to maintain the food preparation area.

April 7, 2004: Commerford was cited by the USDA for improper food storage and poor housekeeping.

August 21, 2003: The USDA cited Commerford for failing to handle animals so that there is minimal risk of harm to the animal and to the public and for failing to dispose of outdated medication.

February 25, 2003: The USDA cited Commerford for failing to protect food from contamination, failing to maintain safe enclosures, and failing to maintain complete and accurate records of acquisition.

June 26, 2001: In a letter to PETA, Shaw's Supermarkets in Massachusetts wrote, "I would agree that the Company should not support the exhibition of petting zoos at our store locations, and we have issued a statement to our stores reinforcing the policy."

June 22, 2001: In a letter to PETA, The Galleria at Bristol Centre in Connecticut wrote, "I am happy to inform you that the Mall at Bristol Centre has decided not to allow R.W. Commerford to operate a petting zoo again in Bristol."

June 1, 2001: The USDA cited Commerford for failing to provide tuberculosis test results for the elephant and the elephant handlers and a program of veterinary care.

February 8, 2001: The USDA cited Commerford for failing to maintain several enclosures with protruding nails and a broken window, inadequate record-keeping, and failing to provide an injured sheep with veterinary care.

June 24, 1999: The USDA stated in a letter that Commerford's giraffe travels lying down on his chest and abdomen in order to fit inside the transport trailer. According to expert guidelines, giraffe transport is very risky. *The Capture and Care Manual* states, "Do not transport giraffes with their necks bent for prolonged periods. ... Once down, adult giraffes ... regain their feet with difficulty. If the giraffe is on [his or her] side ... or in a confined space, [the giraffe] may not be able to regain [his or her] feet at all. Animals on their side will die rapidly from bloat." *Restraint and Handling of Wild and Domestic Animals* states, "Giraffes have died with the peracute mortality syndrome during and shortly after being moved to new locations."

April 1, 1999: The USDA cited Commerford for failing to provide adequate exercise for a giraffe stored in a 10'x20' pen.

November 16, 1998: The USDA cited Commerford for failing to maintain enclosures and transport trailers.

October 3, 1998: According to the *Boston Herald*, the USDA was investigating Commerford for violations of the AWA.

August 27, 1998: While carrying children on her back at the New York State Fair, an elephant named Minnie panicked and knocked down her trainer, then stepped on him. A 3-year-old girl was also injured after falling off the elephant and hitting her head on the ground. Both were treated at a local hospital. Minnie had been involved in at least two previous attacks. (See the August 28, 1989, entry.)

June 25, 1998: Commerford was cited for failing to have a program of veterinary care.

June 24, 1998: Commerford was cited for failing to maintain the elephant transport trailer. The inspector also noted that the program of veterinary care was outdated.

September 27, 1997: The USDA cited Commerford

for failing to maintain enclosures, failing to have an attendant present in the petting zoo, and failing to provide an ill goat with veterinary care.

April 2, 1997: The USDA cited Commerford for poor housekeeping, inadequate "pest" control, and failing to maintain enclosures. They contained broken, cracked, and jagged wood and plastic.

March 14, 1997: After examining several animals with the Commerford petting zoo, a veterinarian with VCA Bowie Animal Hospital in Maryland wrote, "[A sheep] was very thin with labored breathing and bilateral pneumonia. The yak [was] very thin [with] labored respiration and ... pneumonia. The elephant was showing marked lameness on both rear legs. ... I would be very concerned about public safety with an animal that is this sore."

August 8, 1996: The USDA cited Commerford for failing to correct a previously identified noncompliance of not having readily identifiable employees present while animals were on public display.

March 13, 1996: Commerford was cited for improper food and bedding storage and failing to maintain enclosures.

March 10, 1996: The USDA cited Commerford for failing to give veterinary care to four sheep with excessively long hooves, failing to have an identifiable employee present during exhibition, and having an electrical wire inside the prairie dog enclosure.

October 6, 1995: The USDA cited Commerford for failing to provide veterinary care to two llamas with excessively long hooves and failing to document deworming procedures.

August 28, 1995: Commerford was cited for using a 13-year-old attendant to handle the camel and failing to have an attendant present in the petting zoo during periods of public contact.

February 21, 1995: The USDA cited Commerford for inadequate drainage in the elephant enclosure, failing to maintain a camel stall, failing to clean a water receptacle in the cattle and zebu enclosure with a buildup of algae, failing to dispose of a large accumulation of soiled hay, bedding, and feces behind the elephant barn, failing to clean the transport trailer, and failing to provide veterinary care to pygmy goats with excessively large mammary glands and a prairie dog with patches of hair loss.

October 7, 1994: The USDA cited Commerford for failing to comply with feeding regulations.

March 7, 1994: The USDA cited Commerford for improper feeding and failing to provide goats and sheep, who had overgrown hooves, with veterinary care.

February 14, 1994: The USDA cited Commerford for failing to monitor animals during periods of public contact, improper feeding, and failing to have food available for a baby lamb who was too young to be isolated from his mother.

December 9, 1993: Commerford was cited by the USDA for inadequate "pest" control.

September 17, 1993: The USDA cited Commerford for failing to maintain the elephant's transport trailer.

July 22, 1993: The USDA cited Commerford for failing to maintain the elephant's transport trailer, failing to maintain records of acquisition and disposition, failing to keep an elephant giving rides under the control of a handler, failing to have a program of veterinary care, and exhibiting a bull, a zebu, and a giraffe without the presence of an attendant and in a manner that could cause injury to the public.

May 17, 1993: The USDA cited Commerford for improper food storage, keeping piles of manure in and near the elephant yard, failing to provide structurally sound fencing around the zebra enclosure, failing to make necessary repairs to the elephant barn, poor housekeeping, and failing to maintain transport trailers.

October 14, 1992: Commerford was cited for giving animals unsanitary drinking water in rusty receptacles.

October 8, 1992: The USDA cited Commerford for improper food storage, failing to maintain prairie dog cages that contained protruding wires, and failing to provide records of acquisition and disposition.

February 20, 1992: The USDA cited Commerford for failing to provide environment enrichment to primates and failing to erect a structurally sound perimeter fence.

October 12, 1991: The USDA cited Commerford for improper food storage.

July 10, 1991: The USDA cited Commerford for improper food storage and failing to maintain enclosures.

September 18, 1990: The USDA cited Commerford

for a filthy primate enclosure.

August 8, 1990: The USDA cited Commerford for failing to maintain the primate cage and failing to provide adequate space and exercise to the giraffe.

July 13, 1990: The USDA cited Commerford for failing to maintain the rabbit cage.

June 29, 1990: The USDA inspector noted that a "newborn donkey and mother should be allowed quiet quarters" at the Meadowlands Fair.

August 28, 1989: An elephant handler was attacked and critically injured by an elephant named Minnie after he struck the elephant with a bullhook while two children were riding on the elephant's back. Minnie picked up the handler with her trunk and threw him against a trailer, breaking his shoulder and jaw, at the Champlain Valley Fair in Essex Junction, Vermont. According to a witness, "Blood was gushing everywhere. The kids were left stranded." Commerford continued using Minnie for rides at the fair despite a public outcry that the elephant was too dangerous. Years earlier, Minnie had attacked a worker and broken his arm.

From: [Cole, Dana J - APHIS](#)
To: [Dunigan, Anne H - APHIS](#)
Cc: [McKinnie, Carolyn - APHIS](#)
Subject: FW: Response Needed: Questions about Commerford Zoo from Sen. Blumenthal
Date: Tuesday, October 29, 2019 11:38:55 AM
Attachments: [image001.png](#)

Hi Anne, below are responses to the questions regarding necropsies that Carolyn and I came up with.

Bob has reviewed also and is good to go with the text below. Let me know of questions/issues.


Thanks! Dana

From: Dunigan, Anne H - APHIS
Sent: Monday, October 28, 2019 10:51 AM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>
Subject: Response Needed: Questions about Commerford Zoo from Sen. Blumenthal

Good morning Carolyn and Dana—Could you please help with a response on these questions


What is USDA's role in ensuring that the cause of death is determined?

(b) (5), DPP



How does USDA ensure that the necropsy veterinarian renders an independent opinion?

(b) (5), DPP



I have requested the inspection reports from Program Support. Thanks, Anne

From: Hart, Sydney - APHIS

Sent: Monday, October 28, 2019 8:09 AM

To: Dunigan, Anne H - APHIS <anne.dunigan@usda.gov>

Cc: Needham, Christopher M - APHIS <christopher.m.needham@usda.gov>

Subject: Questions about Commerford Zoo from Sen. Blumenthal

Hi Anne,

Senator Richard Blumenthal's office had some additional questions in regards to Commerford Zoo:

What is USDA's role in ensuring that the cause of death is determined?

How does USDA ensure that the necropsy veterinarian renders an independent opinion?

The link to past reports only contained inspections dating back to 2017. Could you send us reports dating back to 2012?

Is there any information I can pass along?

Thanks,



SYDNEY HART

APHIS ▪ LPA ▪ Government Affairs

Cubicle 2B-02.3, Riverdale

Room 1157, South Building

☎ 301-851-4017

✉ Sydney.Hart@usda.gov

From: [Gibbens, Robert - APHIS](#)
To: [Goldentyer, Betty J - APHIS](#)
Cc: [McKinnie, Carolyn - APHIS](#); [Cole, Dana J - APHIS](#); [Dunigan, Anne H - APHIS](#)
Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20
Date: Thursday, December 19, 2019 2:36:35 PM
Attachments: [Commerford 12.pdf](#)
[Commerford 11.pdf](#)
[Commerford 10.pdf](#)
[Commerford 9.pdf](#)
[Commerford 8.pdf](#)
[Commerford 7.pdf](#)
[Commerford 6.pdf](#)
[Commerford 5.pdf](#)
[Commerford 4.pdf](#)
[Commerford 3.pdf](#)
[Commerford 2.pdf](#)
[Commerford 1.pdf](#)

The last 3 years of inspection reports are attached. Carolyn and Tonya are working on the questions. The only citation is on "Commerford 2" I left 3 photos attached to that inspection report.

From: Goldentyer, Betty J - APHIS
Sent: Thursday, December 19, 2019 10:40 AM
To: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>
Subject: Fwd: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Bob

Can you get with Katie and start on this. Probably need the inspectors to answer the questions.

Thanks

Get [Outlook for iOS](#)

From: Frederick, Mandi M - APHIS <mandi.m.frederick@usda.gov>
Sent: Thursday, December 19, 2019 12:04 PM
To: Dunigan, Anne H - APHIS; Needham, Christopher M - APHIS; McNally, Andrea C - APHIS
Cc: Goldberg, Ruth - APHIS; Taylor, Kimberly A - APHIS; Goldentyer, Betty J - APHIS; Anderson, Christa - APHIS
Subject: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Hi all,

I'm attaching a letter that LPA just received from Senator Blumenthal's office about Commerford Zoo in Connecticut. As you'll see, the Senator is concerned about the welfare of animals at the zoo particularly in light of the deaths of 2 elephants. He's asked 5 specific questions and asked for 9 years worth of inspection reports. The Secretary will be signing the response. Could you please read over this letter and provide guidance on how to best

From: [Gibbens, Robert - APHIS](#)
To: [Goldentyer, Betty J - APHIS](#); [McKinnie, Carolyn - APHIS](#); [Dunigan, Anne H - APHIS](#)
Cc: [Whisenton, Katie M - APHIS](#); [Cole, Dana J - APHIS](#)
Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20
Date: Friday, December 20, 2019 9:07:20 AM

I forwarded the last 3 years yesterday. Do we want to forward more?

From: Goldentyer, Betty J - APHIS
Sent: Friday, December 20, 2019 6:37 AM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>; Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>; Dunigan, Anne H - APHIS <anne.dunigan@usda.gov>
Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>
Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Thanks Carolyn,
I think we're ready to send this back to Mandi. Did we get the whole 9 years of inspections together?
Thanks
Betty

From: McKinnie, Carolyn - APHIS
Sent: Thursday, December 19, 2019 11:11 PM
To: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>; Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>
Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>
Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Hi Bob,
Here's what I have compiled based on input from Paula Gladue, Jan Baltrush and Tonya Hadjis. I've added directly to the questions below.
For additional context if needed, I've attached memo's from Paula Gladue and Jan Baltrush, two recent complaint responses involving the Commerford elephants as well as previous emails responding to questions from Blumenthal's office (via Anne Dunigan).
Jan noted that Blumenthal's letter states that the Commerfords have been licensed since May 2000. This is incorrect as she has been inspecting them since Oct. 1988 and they were licensed prior to that. Based on the Commerford's license # 16-C-0006, she believes that they were the sixth exhibitor to get a license back in 1970.
Please let me know if anything needs to be clarified. I'll check my email first thing tomorrow morning in case you have any other questions.
Thanks, Carolyn

From: Gibbens, Robert - APHIS

Sent: Thursday, December 19, 2019 10:18 AM

To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>; Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>

Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>

Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Great -- here's a start. Thanks.

1. What were the initial and final causes of death for elephants Karen and Beulah?

(b) (5), DPP

2. Could those deaths have been prevented? (b) (5), DPP

3. What is USDA's role after unexpected exotic animal deaths?

• (b) (5), DPP

4. How does USDA ensure that the veterinarian performing the necropsy is qualified and renders an independent opinion?

• (b) (5), DPP

(b) (5), DPP

5. Why did Commerford Zoo continue to pass USDA inspections wider AWA despite the premature deaths of two elephants?

- (b) (5), DPP

From: McKinnie, Carolyn - APHIS

Sent: Thursday, December 19, 2019 11:14 AM

To: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>; Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>

Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>

Subject: Re: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Hi Bob, I will work with the inspectors on this today. As an (b) (6), (b) (7)(C) . I am familiar with this as I worked closely with Hadjis on the 2 elephant complaint responses.
Carolyn

Get [Outlook for iOS](#)

From: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>

Sent: Thursday, December 19, 2019 10:04:35 AM

To: Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>

Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>; McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>

Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Never mind about my suggested deadline, just saw we need to forward by 12/20.

From: Gibbens, Robert - APHIS

Sent: Thursday, December 19, 2019 10:58 AM

To: Betty J - APHIS Goldentyer (betty.j.goldentyer@usda.gov) <betty.j.goldentyer@usda.gov>

Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>; Carolyn - APHIS McKinnie (carolyn.j.mckinnie@usda.gov) <carolyn.j.mckinnie@usda.gov>

Subject: FW: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Yes, we'll get answers to the questions from Hadjis/inspector. Do we need 10 years of inspections or 3? The deadline in the letter is January 18; if we get it to Mandi by January 7, would that be okay?

Thanks.

From: Goldentyer, Betty J - APHIS

Sent: Thursday, December 19, 2019 10:40 AM

To: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>

Subject: Fwd: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Bob

Can you get with Katie and start on this. Probably need the inspectors to answer the questions.

Thanks

Get [Outlook for iOS](#)

From: Frederick, Mandi M - APHIS <mandi.m.frederick@usda.gov>

Sent: Thursday, December 19, 2019 12:04 PM

To: Dunigan, Anne H - APHIS; Needham, Christopher M - APHIS; McNally, Andrea C - APHIS

Cc: Goldberg, Ruth - APHIS; Taylor, Kimberly A - APHIS; Goldentyer, Betty J - APHIS; Anderson, Christa - APHIS

Subject: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Hi all,

I'm attaching a letter that LPA just received from Senator Blumenthal's office about Commerford Zoo in Connecticut. As you'll see, the Senator is concerned about the welfare of animals at the zoo particularly in light of the deaths of 2 elephants. He's asked 5 specific questions and asked for 9 years worth of inspection reports. The Secretary will be signing the response. Could you please read over this letter and provide guidance on how to best respond?

Chris—I'm not sure if we need to answer each of his questions in turn. If it was an oversight letter, I'm sure we would but in this case, do we need to? And if we do need to answer each question—Anne, can AC please provide the input?

RE: Inspection reports—Andrea, can we give these out or would we need to ask the Senator to file a FOIA for them?

Since Secretary Perdue is signing this letter, we need to move it rather quickly so if you could **please get me your input by tomorrow at noon**, that would be great. I should also note that I'm looping in others in LPA b/c I will be on leave next week so someone else is likely to draft or take over this response.

Thank you!

Mandi M. Frederick
Writer/Editor--Executive Communications
Legislative and Public Affairs
APHIS-USDA
4700 River Rd., Unit 49
Riverdale, MD 20737
2A02.30
(301) 851-4095

From: [McNally, Andrea C - APHIS](#)
To: [Frederick, Mandi M - APHIS](#); [Gibbens, Robert - APHIS](#); [Dunigan, Anne H - APHIS](#); [Needham, Christopher M - APHIS](#); [Goldentyer, Betty J - APHIS](#)
Cc: [Taylor, Kimberly A - APHIS](#); [Goldberg, Ruth - APHIS](#); [Myers, Christina J - APHIS](#)
Subject: RE: Review Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/23
Date: Sunday, December 22, 2019 3:27:33 PM
Attachments: [image001.png](#)
[RW Commerford IRs_Redacted.pdf](#)

Here are the redacted inspection reports to provide. Happy holidays everyone!

Andrea McNally
Management Analyst, FOIA
Animal and Plant Health Inspection Service, USDA
202-799-7026
andrea.c.mcnally@usda.gov

From: Frederick, Mandi M - APHIS
Sent: Friday, December 20, 2019 2:13 PM
To: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>; Dunigan, Anne H - APHIS <anne.dunigan@usda.gov>; Needham, Christopher M - APHIS <christopher.m.needham@usda.gov>; Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>
Cc: Taylor, Kimberly A - APHIS <kim.a.taylor@usda.gov>; Goldberg, Ruth - APHIS <ruth.goldberg@usda.gov>; Myers, Christina J - APHIS <christina.j.myers@usda.gov>; McNally, Andrea C - APHIS <andrea.c.mcnally@usda.gov>
Subject: Review Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/23

Hi all,

I'm attaching a draft response for your review. I'll be out of the office after today. Could you please take a look and send any edits you have to Ruth Goldberg, Kim Taylor, and Christina Myers by Monday 12/23 at noon?

Dr. Gibbens—RE: the 10 years worth of inspection reports, once ACIS is back up, can you please send all the reports to Andrea McNally and the folks listed above? Andrea will be on leave next week but has generously agreed to take a few moments to review the records and make any redactions necessary. When you send the records to Andrea, **please note that you should give her a quick ring just to let her know that they're in her inbox. Her number is 202-799-7026.**

Thank you so much for your speedy assistance with this response. It really is greatly appreciated. I hope you all have a lovely holiday season.

Best,
Mandi

Mandi M. Frederick
Writer/Editor--Executive Communications

Legislative and Public Affairs
APHIS-USDA
4700 River Rd., Unit 49
Riverdale, MD 20737
2A02.30
(301) 851-4095

From: Gibbens, Robert - APHIS
Sent: Friday, December 20, 2019 10:03 AM
To: Frederick, Mandi M - APHIS <mandi.m.frederick@usda.gov>
Cc: Dunigan, Anne H - APHIS <anne.dunigan@usda.gov>; Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>; Rhyner, Aaron A - APHIS <aaron.a.rhyner@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>; McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>
Subject: FW: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Hi Mandi. Answers to the question are below. We were able to pull the last 3 years of inspection reports before ACIS went down. ACIS is being worked on but remains unavailable, and we don't know when it will come back up. As soon as it does, we'll forward the remaining inspection reports. Let me know if there are additional questions. Thanks.....Bob

Thanks.....Bob

Robert M. Gibbens, DVM
Associate Deputy Administrator
USDA, APHIS, Animal Care
2150 Centre Avenue, Bldg. B
Ft. Collins, CO 80526
Phone: 970-494-7478
Fax: 970-472-9558



[Join the Animal Care Stakeholder Registry and receive emails on topics of interest](#)

1. What were the initial and final causes of death for elephants Karen and Beulah?



(b) (5), DPP

2. Could those deaths have been prevented?



(b) (5), DPP

(b) (5), DPP

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Sent: Thursday, December 19, 2019 12:04 PM

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Cc: Goldberg, Ruth - APHIS; Taylor, Kimberly A - APHIS; Goldentyer, Betty J - APHIS; Anderson, Christa - APHIS

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Mandi M. Frederick
Writer/Editor--Executive Communications
Legislative and Public Affairs
APHIS-USDA
4700 River Rd., Unit 49
Riverdale, MD 20737
2A02.30
(301) 851-4095



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: **1940**

Certificate: **16-C-0006**

Site: 001

R W COMMERFORD & SONS INC

Type: ROUTINE INSPECTION

Date: 23-MAR-2017

No non-compliant items identified during this inspection.

This inspection and exit interview were conducted with the licensee.

Prepared By:

BALTRUSH JAN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:

23-MAR-2017

Received By:

(b) (6), (b) (7)(C)

Title: SENT VIA EMAIL

Date:

23-MAR-2017



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: 1940
Certificate: 16-C-0006
Site: 001
R W COMMERFORD & SONS INC

Type: FOCUSED INSPECTION
Date: 02-MAY-2017

2.40(b)(2)

ATTENDING VETERINARIAN AND ADEQUATE VETERINARY CARE (DEALERS AND EXHIBITORS).

During this inspection only one elephant ("Beulah") was present. While looking over her nails, foot pads, and cuticles it was noted that her cuticles were in need of attention. The cuticles were long and jagged and needed to be trimmed. We reviewed their vet care log and it was documented that her toe nails and pads were trimmed on March 21, 2017. However, there is no documentation about the cuticles being addressed. To ensure her health and prevent any injuries this situation will need to be addressed.

***To Be Corrected By: May 8, 2017

An exit interview was conducted with a representative of the licensee.

Additional Inspectors

Gladue Paula, Veterinary Medical Officer

Prepared By:

BALTRUSH JAN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:
05-MAY-2017

Received By:

(b) (6), (b) (7)(C)

Title: SENT VIA EMAIL

Date:
05-MAY-2017



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: 1940

Certificate: 16-C-0006

Site: TRA 2

GREEN UNIT

Type: ROUTINE INSPECTION

Date: 08-SEP-2017

There were no non-compliant items identified during the inspection.

NOTE – Inspection conducted at the North Haven Fairgrounds in North Haven, CT. African elephant inspected: Karen. Exit briefing held 9/8/17 on-site with Licensee. Report delivered by e-mail 9/10/17.

END OF REPORT

Prepared By:

GLADUE PAULA, V M D USDA, APHIS, Animal Care

Title: VETERINARY MEDICAL OFFICER 1054

Date:

10-SEP-2017

Received By:

(b) (6), (b) (7)(C)

Title: REPORT DELIVERED BY EMAIL 9/10/17

Date:

10-SEP-2017



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: **1940**

Certificate: **16-C-0006**

Site: TRA 1

RED UNIT

Type: ROUTINE INSPECTION

Date: 20-SEP-2017

No non-compliant items identified during this inspection.

This inspection and exit interview were conducted with the licensee.

This inspection was conducted at the Eastern States Fair, Springfield, MA.

Prepared By:

BALTRUSH JAN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:

03-OCT-2017

Received By:

(b) (6), (b) (7)(C)

Title: SENT VIA EMAIL

Date:

03-OCT-2017



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: **1940**

Certificate: **16-C-0006**

Site: TRA 2

GREEN UNIT

Type: ROUTINE INSPECTION

Date: 20-SEP-2017

No non-compliant items identified during this inspection.

This inspection and exit interview were conducted with the licensee.

This inspection was conducted at the Eastern States Fair, Springfield, MA.

Prepared By:

BALTRUSH JAN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:

03-OCT-2017

Received By:

(b) (6), (b) (7)(C)

Title: SENT VIA EMAIL

Date:

03-OCT-2017



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: **1940**
Certificate: **16-C-0006**
Site: 001
R W COMMERFORD & SONS INC

Type: ROUTINE INSPECTION
Date: 21-FEB-2018

No non-compliant items identified during this inspection.

This inspection and exit interview were conducted with a representative of the licensee.

Prepared By:

BALTRUSH JAN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:
23-FEB-2018

Received By:

(b) (6), (b) (7)(C)

Title: SENT VIA EMAIL

Date:
23-FEB-2018



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: **1940**
Certificate: **16-C-0006**
Site: TRA 2
GREEN UNIT

Type: ROUTINE INSPECTION
Date: 19-SEP-2018

No non-compliant items identified during this inspection.

This inspection was conducted at the Big E, West Springfield, MA.

This inspection and exit interview were conducted with the licensee.

Prepared By:

BALTRUSH JAN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:
23-SEP-2018

Received By:

(b) (6), (b) (7)(C)

Title: SENT VIA EMAIL

Date:
23-SEP-2018



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: **1940**
Certificate: **16-C-0006**
Site: TRA 1
RED UNIT

Type: ROUTINE INSPECTION
Date: 19-SEP-2018

No non-compliant items identified during this inspection.

This inspection was conducted at the Big E, West Springfield, MA.

This inspection and exit interview were conducted with the licensee.

Prepared By:

BALTRUSH JAN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:
23-SEP-2018

Received By:

(b) (6), (b) (7)(C)

Title: SENT VIA EMAIL

Date:
23-SEP-2018



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: **1940**
Certificate: **16-C-0006**
Site: 001
R W COMMERFORD & SONS INC

Type: FOCUSED INSPECTION
Date: 05-MAR-2019

This was a focused inspection to address a complaint.

No non-compliant items identified during this inspection.

This inspection and exit interview were conducted with the licensee.

Additional Inspectors

Gladue Paula, Veterinary Medical Officer

Prepared By:

BALTRUSH JAN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:
08-MAR-2019

Received By:

(b) (6), (b) (7)(C)

Title: SENT VIA EMAIL

Date:
08-MAR-2019



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: **1940**

Certificate: **16-C-0006**

Site: 001

R W COMMERFORD & SONS INC

Type: ROUTINE INSPECTION

Date: 29-APR-2019

No non-compliant items identified during this inspection.

This inspection and exit interview were conducted with the licensee.

Prepared By:

BALTRUSH JAN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:

03-MAY-2019

Received By:

(b) (6), (b) (7)(C)

Title: SENT VIA EMAIL

Date:

03-MAY-2019



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: **1940**
Certificate: **16-C-0006**
Site: TRA 2
GREEN UNIT

Type: ROUTINE INSPECTION
Date: 21-AUG-2019

This inspection was conducted at the Dutchess Co Fair - Rhinebeck, NY.

No non-compliant items identified during this inspection.

This inspection and exit interview were conducted with the licensee.

Prepared By:

BALTRUSH JAN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:
23-AUG-2019

Received By:

(b) (6), (b) (7)(C)

Title: SENT VIA EMAIL

Date:
23-AUG-2019



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: **1940**
Certificate: **16-C-0006**
Site: 001
R W COMMERFORD & SONS INC

Type: FOCUSED INSPECTION
Date: 17-OCT-2019

No non-compliant items identified during this focused inspection.

This inspection and exit interview were conducted with a representative of the licensee.

Asian Elephant: Minnie

Additional Inspectors

Gladue Paula, Veterinary Medical Officer

Prepared By:

BALTRUSH JAN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:
03-NOV-2019

Received By:

(b) (6), (b) (7)(C)

Title: VICE PRESIDENT

Date:
04-NOV-2019



United States Department of Agriculture
Animal and Plant Health Inspection Service

JBALTRUSH

2016082567938090 Insp_id

Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: 1940
Certificate: 16-C-0006
Site: TRA 1
RED UNIT

Type: ROUTINE INSPECTION
Date: 22-SEP-2016

This inspection was conducted at the Eastern States Exposition Fair (Big E), Springfield, MA.

No non-compliant items identified during this inspection.

This inspection and exit interview were conducted with the licensee.

African Elephant - Karen was present

Additional Inspectors

Jessica Gowins, Veterinary Medical Officer

Prepared By:

JAN BALTRUSH USDA, APHIS, Animal Care

Date:
25-SEP-2016

Title: ANIMAL CARE INSPECTOR 1011

Received By:

(b) (6), (b) (7)(C)



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: 22-SEP-16
Animal Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 1	R W COMMERFORD & SONS INC	22-SEP-16

Count	Species
000001	AFRICAN ELEPHANT
000001	ALPACA
000001	COMMON ZEBRA / BURCHELL'S ZEBRA / GRANT'S ZEBRA / CHAPMAN'S ZEBRA / PLAINS ZEBRA
000001	LLAMA
000001	SCIMITAR-HORNED ORYX
000003	ZEBU
000004	DOMESTIC DROMEDARY CAMEL
000026	DOMESTIC GOAT
000031	SHEEP INCLUDING ALL DOMESTIC BREEDS
000069	Total



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: 1940

Certificate: 16-C-0006

Site: TRA 2

GREEN UNIT

Type: ROUTINE INSPECTION

Date: 22-SEP-2016

This inspection was conducted at the Eastern States Exposition Fair (Big E), Springfield, MA.

No non-compliant items identified during this inspection.

This inspection and exit interview were conducted with the licensee.

Asian Elephant - Beulah was present

Additional Inspectors

Jessica Gowins, Veterinary Medical Officer

Prepared By:

JAN BALTRUSH USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 1011

Date:

25-SEP-2016

Received By:

(b) (6), (b) (7)(C)

TREASURER



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: 1940

Certificate: 16-C-0006

Site: 001

R W COMMERFORD & SONS INC

Type: ROUTINE INSPECTION

Date: Aug-10-2016

This was a FOCUSED inspection of the 2 Asian Elephants, Beulah and Minnie, and the 1 African Elephant, Karen. There were no non-compliant items identified during the inspection.

NOTE - Exit interview held 8/10/16 on-site with Licensee. Report delivered by e-mail 8/11/16.

END OF REPORT

Prepared By:

(b) (6), (b) (7)(C)

PAULA S GLADUE, V M D USDA, APHIS, Animal Care

Title: VETERINARY MEDICAL OFFICER Inspector 1054

Date:

Aug-11-2016

Received By:

(b) (6), (b) (7)(C)

Title: REPORT DELIVERED BY E-MAIL 8/11/16

Date:

Aug-11-2016



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: Aug-10-16
Animals Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	18-C-0006	001	R W COMMERFORD & SONS INC	Aug-10-16

Count	Species
000001	AFRICAN ELEPHANT
000002	ASIATIC ELEPHANT



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: 1940
Certificate: 16-C-0006
Site: TRA 1
RED UNIT

Type: ROUTINE INSPECTION
Date: Mar-19-2016

Facility meets all standards and regulations at this time.

This inspection was conducted at the XL Center, Hartford, CT.

An exit briefing was conducted with the licensee.

Prepared By:

(b) (6), (b) (7)(C)

JAN P BALTRUSH, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR Inspector 1011

Date:

Mar-22-2016

Received By:

(b) (6), (b) (7)(C)

Title: SENT VIA EMAIL

Date:

Mar-22-2016



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: Mar-19-16
Animals Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 1	RED UNIT	Mar-19-16

Count	Species
000001	AFRICAN CRESTED PORCUPINE
000001	AFRICAN ELEPHANT
000001	ASIATIC ELEPHANT
000001	ASIATIC WATER BUFFALO
000001	COATI MUNDI
000001	COMMON ZEBRA
000001	EASTERN GREY KANGAROO
000001	SCIMITAR-HORNED ORYX
000002	COW OR OX
000002	EUROPEAN RABBIT
000002	PATAGONIAN CAVY
000003	ZEBU
000004	DOMESTIC DROMEDARY CAMEL
000007	RING-TAILED LEMUR
000026	GOAT
000031	SHEEP OR MOUFLON



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: 1940

Certificate: 16-C-0006

Site: 001

R W COMMERFORD & SONS INC

Type: ROUTINE INSPECTION

Date: Nov-02-2015

Facility meets all standards and regulations at this time.

An exit briefing was conducted with the licensee.

Prepared By:

(b) (6), (b) (7)(C)

JAN P BALTRUSH, A C I

USDA, APHIS, Animal Care

Date:

Title:

ANIMAL CARE INSPECTOR

Inspector 1011

Nov-05-2015

Received By:

(b) (6), (b) (7)(C)

Title:

SENT VIA EMAIL

Date:

Nov-05-2015



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: Nov-02-15
Animals Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	001	R W COMMERFORD & SONS INC	Nov-02-15

Count	Species
000001	AFRICAN CRESTED PORCUPINE
000001	DOMESTIC YAK
000001	GIRAFFE
000001	MOUNTAIN COATI
000001	RED KANGAROO
000002	ASIATIC ELEPHANT
000003	LLAMA
000003	RING-TAILED LEMUR
000003	ZEBU
000005	DOMESTIC DROMEDARY CAMEL
000030	GOAT
000056	SHEEP OR MOUFLON



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: 1940
Certificate: 16-C-0006
Site: TRA 2
GREEN UNIT

Type: ROUTINE INSPECTION
Date: Aug-25-2015

This inspection was conducted at the Dutchess County Fairgrounds, Rhinebeck, NY.

Facility meets all standards and regulations at this time.

An exit interview was conducted with the licensee.

Prepared By:

(b) (6), (b) (7)(C)

JAN P BALTRUSH, A C I

USDA, APHIS, Animal Care

Title:

ANIMAL CARE INSPECTOR

Inspector 1011

Date:

Aug-27-2015

Received By:

(b) (6), (b) (7)(C)

Title:

SENT VIA EMAIL

Date:

Aug-27-2015



Animals Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 2	GREEN UNIT	Aug-25-15

Count	Species
000001	COATI MUNDI
000001	DOMESTIC PIG
000001	RED KANGAROO
000002	ZEBU
000003	LLAMA
000003	RING-TAILED LEMUR
000004	DOMESTIC DROMEDARY CAMEL
000013	SHEEP OR MOUFLON
000016	GOAT



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: 1940

Certificate: 16-C-0006

Site: 001

R W COMMERFORD & SONS INC

Type: ROUTINE INSPECTION

Date: Apr-14-2015

Facility meets all standards and regulations at this time.

An exit briefing was conducted with the licensee.

Prepared By:

(b) (6), (b) (7)(C)

JAN P BALTRUSH, A C I

USDA, APHIS, Animal Care

Date:

Title:

ANIMAL CARE INSPECTOR

Inspector 1011

Apr-16-2015

Received By:

(b) (6), (b) (7)(C)

Title:

SENT VIA EMAIL

Date:

Apr-16-2015



Animals Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	001	R W COMMERFORD & SONS INC	Apr-14-15

Count	Species
000001	AFRICAN ELEPHANT
000001	ALPACA
000001	COMMON ZEBRA
000001	COW OR OX
000001	DOMESTIC YAK
000001	GIRAFFE
000001	MOUNTAIN COATI
000001	RED KANGAROO
000001	SCIMITAR-HORNED ORYX
000002	AFRICAN CRESTED PORCUPINE
000002	ASIATIC ELEPHANT
000002	PATAGONIAN CAVY
000004	LLAMA
000004	ZEBU
000007	DOMESTIC DROMEDARY CAMEL
000008	RING-TAILED LEMUR
000048	GOAT
000050	SHEEP OR MOUFLON



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: 1940

Certificate: 16-C-0006

Site: TRA 2

GREEN UNIT

Type: ROUTINE INSPECTION

Date: Apr-10-2015

This inspection was conducted at the Show Place Arena in Upper Marlboro, MD.
Facility meets all standards and regulations at this time.
An exit briefing was conducted with the licensee.

This is an electronic version of the Microsoft Word inspection report dated Apr-10-2015.

Prepared By:

(b) (6), (b) (7)(C)

GLORIA S MCFADDEN, D V M USDA, APHIS, Animal Care

Title: VETERINARY MEDICAL OFFICER Inspector 1048

Date:

Apr-14-2015

Received By:

(b) (6), (b) (7)(C)

Title: MANAGER

Date:

Apr-14-2015



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: Apr-10-15
Animals Inspected at Last Inspection

Cust No	Cart No	Site	Site Name	Inspection
1940	16-C-0006	TRA 2	GREEN UNIT	Apr-10-15

Count	Species
000001	AFRICAN CRESTED PORCUPINE
000001	ALPACA
000001	ASIATIC ELEPHANT
000001	COATI MUNDI
000001	DOMESTIC YAK
000001	RED KANGAROO
000001	ZEBU
000002	DOMESTIC DROMEDARY CAMEL
000002	EUROPEAN RABBIT
000002	LLAMA
000002	PATAGONIAN CAVY
000003	SHEEP OR MOUFLON
000008	RING-TAILED LEMUR
000020	GOAT



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: 1940
Certificate: 16-C-0006
Site: TRA 1
RED UNIT

Type: ROUTINE INSPECTION
Date: Apr-10-2015

This inspection was conducted at the Show Place Arena, Upper Marlboro, MD

Facility meets all standards and regulations at this time.

An exit briefing was conducted with the licensee.

Prepared By:

(b) (6), (b) (7)(C)

GLORIA S MCFADDEN, D V M USDA, APHIS, Animal Care

Title:

VETERINARY MEDICAL OFFICER Inspector 1048

Date:

Apr-10-2015

Received By:

(b) (6), (b) (7)(C)

Title:

MANAGER

Date:

Apr-10-2015



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: Apr-10-15
Animals Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 1	RED UNIT	Apr-10-15

Count	Species
000001	AFRICAN ELEPHANT
000001	COMMON ZEBRA
000001	COW OR OX
000001	DOMESTIC DROMEDARY CAMEL
000001	SCIMITAR-HORNED ORYX
000001	ZEBU
000002	LLAMA
000008	GOAT
000016	SHEEP OR MOUFLON



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: 1940

Certificate: 16-C-0006

Site: TRA 2

GREEN UNIT

Type: ROUTINE INSPECTION

Date: Sep-12-2014

This inspection was conducted at the Eastern States Exposition Fair (The Big E), West Springfield, MA.

Facility meets all standards and regulations at this time.

An exit briefing was conducted with the licensee.

Prepared By:

(b) (6), (b) (7)(C)

JAN P BALTRUSH, A C I

USDA, APHIS, Animal Care

Date:

Title:

ANIMAL CARE INSPECTOR

Inspector 1011

Sep-14-2014

Received By:

(b) (6), (b) (7)(C)

Title:

SENT VIA EMAIL

Date:

Sep-14-2014



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: Sep-12-14
Animals Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 2	GREEN UNIT	Sep-12-14

Count	Species
000001	ASIATIC ELEPHANT
000001	COATI MUNDI
000001	COW OR OX
000001	RED KANGAROO
000002	ZEBU
000003	LLAMA
000005	DOMESTIC DROMEDARY CAMEL
000005	RING-TAILED LEMUR
000013	GOAT
000015	SHEEP OR MOUFLON



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: 1940
Certificate: 16-C-0006
Site: TRA 1
RED UNIT

Type: ROUTINE INSPECTION
Date: Sep-12-2014

This inspection was conducted at the Eastern States Exposition Fair (The Big E), West Springfield, MA.

Facility meets all standards and regulations at this time.

An exit briefing was conducted with the licensee.

Prepared By:

(b) (6), (b) (7)(C)

JAN P BALTRUSH, A C I

USDA, APHIS, Animal Care

Date:

Title:

ANIMAL CARE INSPECTOR

Inspector 1011

Sep-14-2014

Received By:

(b) (6), (b) (7)(C)

Date:

Title:

SENT VIA EMAIL

Sep-14-2014



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: Sep-12-14
Animals Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 1	RED UNIT	Sep-12-14

Count	Species
000001	AFRICAN ELEPHANT
000001	COMMON ZEBRA
000001	COW OR OX
000001	DOMESTIC DROMEDARY CAMEL
000001	SCIMITAR-HORNED ORYX
000001	ZEBU
000002	LLAMA
000008	GOAT
000016	SHEEP OR MOUFLON



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: 1940
Certificate: 16-C-0006
Site: TRA 1
RED UNIT

Type: ROUTINE INSPECTION
Date: Feb-22-2014

This inspection was conducted at the Eastern States Fairgrounds - Springfield, MA.

Facility meets all standards and regulations at this time.

An exit briefing was conducted with the licensee.

Prepared By:

(b) (6), (b) (7)(C)

JAN P BALTRUSH, A C I

USDA, APHIS, Animal Care

Date:

Title:

ANIMAL CARE INSPECTOR

Inspector 1011

Feb-24-2014

Received By:

(b) (6), (b) (7)(C)

Title:

SENT VIA EMAIL

Date:

Feb-24-2014



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: Feb-22-14
Animals Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 1	RED UNIT	Feb-22-14

Count	Species
000001	AFRICAN ELEPHANT
000001	ASIATIC ELEPHANT
000001	COATI MUNDI
000001	COMMON ZEBRA
000001	DOMESTIC YAK
000001	EASTERN GREY KANGAROO
000001	SCIMITAR-HORNED ORYX
000002	ALPACA
000002	DOMESTIC DROMEDARY CAMEL
000003	LLAMA
000003	VIETNAMESE WARTY PIG
000003	ZEBU
000005	EUROPEAN RABBIT
000022	SHEEP OR MOUFLON
000043	GOAT



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: 1940

Certificate: 16-C-0006

Site: 001

R W COMMERFORD & SONS INC

Type: ROUTINE INSPECTION

Date: Jan-30-2014

Facility meets all standards and regulations at this time.

An exit briefing was conducted with the licensee.

Prepared By:

(b) (6), (b) (7)(C)

JAN P BALTRUSH, A C I

USDA, APHIS, Animal Care

Date:

Title:

ANIMAL CARE INSPECTOR

Inspector 1011

Jan-30-2014

Received By:

(b) (6), (b) (7)(C)

Title:

SENT VIA EMAIL

Date:

Jan-30-2014



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: Jan-30-14
Animals Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	001	R W COMMERFORD & SONS INC	Jan-30-14

Count	Species
000001	AFRICAN ELEPHANT
000001	CAPYBARA
000001	COMMON ZEBRA
000001	DOMESTIC YAK
000001	GIRAFFE
000001	MOUNTAIN COATI
000001	SCIMITAR-HORNED ORYX
000002	AFRICAN CRESTED PORCUPINE
000002	ALPACA
000002	ASIATIC ELEPHANT
000002	PATAGONIAN CAVY
000002	RED KANGAROO
000003	DOMESTIC DROMEDARY CAMEL
000003	VIETNAMESE WARTY PIG
000004	LLAMA
000004	ZEBU
000005	EUROPEAN RABBIT
000010	RING-TAILED LEMUR
000048	GOAT
000050	SHEEP OR MOUFLON



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: 1940
Certificate: 16-C-0006
Site: TRA 2
GREEN UNIT

Type: ROUTINE INSPECTION
Date: Sep-19-2013

Facility meets all standards and regulations at this time.

An exit briefing was conducted with the licensee.

This inspection was conducted at the Big E Fair, West Springfield, MA.

Prepared By:

(b) (6), (b) (7)(C)

JAN P BALTRUSH, A C I

USDA, APHIS, Animal Care

Date:

Title:

ANIMAL CARE INSPECTOR

Inspector 1011

Sep-20-2013

Received By:

(b) (6), (b) (7)(C)

Title:

SENT VIA EMAIL

Date:

Sep-20-2013



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: Sep-19-13
Animals Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 2	GREEN UNIT	Sep-19-13

Count	Species
000001	ASIATIC ELEPHANT
000001	COATI MUNDI
000001	EASTERN GREY KANGAROO
000002	ZEBU
000003	DOMESTIC DROMEDARY CAMEL
000004	LLAMA
000005	RING-TAILED LEMUR
000015	SHEEP OR MOUFLON
000016	GOAT



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: 1940

Certificate: 16-C-0006

Site: TRA 1

RED UNIT

Type: ROUTINE INSPECTION

Date: Sep-19-2013

Facility meets all standards and regulations at this time.

An exit briefing was conducted with the licensee.

This inspection was conducted at the Big E Fair, West Springfield, MA.

Prepared By:

(b) (6), (b) (7)(C)

JAN P BALTRUSH, A C I

USDA, APHIS, Animal Care

Title:

ANIMAL CARE INSPECTOR

Inspector 1011

Date:

Sep-20-2013

Received By:

(b) (6), (b) (7)(C)

Title:

SENT VIA EMAIL

Date:

Sep-20-2013



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: Sep-19-13
Animals Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 1	RED UNIT	Sep-19-13

Count	Species
000001	AFRICAN ELEPHANT
000001	COMMON ZEBRA
000001	DOMESTIC DROMEDARY CAMEL
000001	SCIMITAR-HORNED ORYX
000001	ZEBU
000002	ALPACA
000017	GOAT
000018	SHEEP OR MOUFLON



Inspection Report

R W Commerford & Sons Inc
P O Box 188
Route 4
Goshen, CT 06756

Customer ID: 1940
Certificate: 16-C-0006
Site: TRA 2
GREEN UNIT

Type: ROUTINE INSPECTION
Date: Aug-22-2013

Facility meets all standards and regulations at this time.

This inspection was conducted at the Dutchess County Fair, Rhinebeck, NY.

An exit briefing was conducted with the licensee.

Prepared By:

(b) (6), (b) (7)(C)

JAN P BALTRUSH, A C I
USDA, APHIS, Animal Care
Title: ANIMAL CARE INSPECTOR Inspector 1011

Date:
Aug-22-2013

Received By:

(b) (6), (b) (7)(C)

Title: SENT VIA E-MAIL

Date:
Aug-22-2013



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: Aug-22-13
Animals Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 2	GREEN UNIT	Aug-22-13

Count	Species
000001	COATI MUNDI
000001	EASTERN GREY KANGAROO
000002	ZEBU
000003	DOMESTIC DROMEDARY CAMEL
000004	LLAMA
000005	RING-TAILED LEMUR
000015	SHEEP OR MOUFLON
000016	GOAT



Inspection Report

R W COMMERFORD & SONS INC

Customer ID: 1940

Certificate: 16-C-0006

Site: 001

R W COMMERFORD & SONS INC

P O BOX 188

ROUTE 4

GOSHEN, CT 06756

Type: ROUTINE INSPECTION

Date: Feb-26-2013

Facility meets all standards and regulations at this time.

An exit briefing was conducted with the licensee.

Prepared By:

JAN P BALTRUSH, A C I USDA, APHIS, Animal Care
Title: ANIMAL CARE INSPECTOR Inspector 1011

Date:
Feb-27-2013

Received By:

(b) (6), (b) (7)(C)
Title: SENT VIA E-MAIL

Date:
Feb-27-2013



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: Feb-26-13
Animals Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	001	R W COMMERFORD & SONS INC	Feb-26-13

Count	Species
000001	CAPYBARA
000001	COMMON ZEBRA
000001	DOMESTIC YAK
000001	MOUNTAIN COATI
000001	PIG
000001	RED KANGAROO
000001	SCIMITAR-HORNED ORYX
000002	AFRICAN CRESTED PORCUPINE
000002	ALPACA
000002	PATAGONIAN CAVY
000003	EUROPEAN RABBIT
000004	DOMESTIC DROMEDARY CAMEL
000004	LLAMA
000005	CHINCHILLA
000009	ZEBU
000011	RING-TAILED LEMUR
000048	GOAT
000060	SHEEP OR MOUFLON



Inspection Report

R W COMMERFORD & SONS INC

Customer ID: 1940

Certificate: 16-C-0006

Site: TRA 1

RED UNIT

P O BOX 188

ROUTE 4

GOSHEN, CT 06756

Type: ROUTINE INSPECTION

Date: 16 February 2013

No non-compliant items identified during this inspection.

Exit interview conducted with facility representative. This inspection was conducted at the Kid's Fun Fair in Wilmington, MA.

Prepared By:

TONYA HADJIS, D V M USDA, APHIS, Animal Care

Title: VETERINARY MEDICAL OFFICER Inspector 1081

Date:

16 February 2013

Received By:

(b) (6), (b) (7)(C)

Title: TREASURER

Date:

16 February 2013



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: Feb-16-13
Animals Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 1	RED UNIT	Feb-16-13

Count	Species
000001	AFRICAN ELEPHANT
000001	COMMON ZEBRA
000001	SCIMITAR-HORNED ORYX
000001	ZEBU
000002	LLAMA



Inspection Report

R W COMMERFORD & SONS INC

Customer ID: 1940

Certificate: 16-C-0006

Site: TRA 2

GREEN UNIT

P O BOX 188

ROUTE 4

GOSHEN, CT 06756

Type: ROUTINE INSPECTION

Date: 16 February 2013

No non-compliant items identified during this inspection.

Exit interview conducted with facility representative. This inspection was conducted at the Kid's Fun Fair in Wilmington, MA.

Prepared By:

TONYA HADJIS, D V M USDA, APHIS, Animal Care

Title: VETERINARY MEDICAL OFFICER Inspector 1081

Date:

16 February 2013

Received By:

(b) (6), (b) (7)(C)

Title: TREASURER

Date:

16 February 2013



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: Feb-16-13
Animals Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 2	GREEN UNIT	Feb-16-13

Count	Species
000001	ASIATIC ELEPHANT
000001	CAPYBARA
000001	DOMESTIC YAK
000001	EASTERN GREY KANGAROO
000001	EUROPEAN RABBIT
000002	ALPACA
000002	DOMESTIC DROMEDARY CAMEL
000002	PATAGONIAN CAVY
000008	RING-TAILED LEMUR
000026	GOAT
000038	SHEEP OR MOUFLON



Inspection Report

R W COMMERFORD & SONS INC

Customer ID: 1940

Certificate: 16-C-0006

Site: 001

R W COMMERFORD & SONS INC

P O BOX 188

ROUTE 4

GOSHEN, CT 06756

Type: ROUTINE INSPECTION

Date: 13 November 2012

There were no non-compliant items identified during the inspection.

NOTE - This was a focused inspection of Camels, Kangaroo, and Elephants. The following elephants were present: Minnie (Asian), Beulah (Asian), and Karen (African).

NOTE - Exit interview held 11/13/12 on-site with Licensee. Report delivered by e-mail 11/15/12.

END OF REPORT

Prepared By:

PAULA S GLADUE, V M D USDA, APHIS, Animal Care

Title: VETERINARY MEDICAL OFFICER Inspector 1054

Date:

15 November 2012

Received By:

(b) (6), (b) (7)(C) COMMERFORD AND SONS

Title: REPORT DELIVERED BY E-MAIL 11-15-12

Date:

15 November 2012



Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	001	R W COMMERFORD & SONS INC	Nov-13-12

Count	Species
000001	AFRICAN ELEPHANT
000001	RED KANGAROO
000002	ASIATIC ELEPHANT
000004	DOMESTIC DROMEDARY CAMEL



Inspection Report

R W COMMERFORD & SONS INC

Customer ID: 1940

Certificate: 16-C-0006

Site: 001

R W COMMERFORD & SONS INC

P O BOX 188

ROUTE 4

GOSHEN, CT 06756

Type: ROUTINE INSPECTION

Date: 04 September 2012

There were no non-compliant items identified during the inspection.

NOTE - This was a focused inspection of the home site of the Licensee and included items and areas related to the care of the Elephants. The following Elephants were present: Minnie (Asian), Beulah (Asian), and Karen (African).

NOTE - Exit interview held 9/4/12 on-site with Licensee. Report delivered by e-mail on 9/4/12.

****END OF REPORT****

Prepared By:

Title: PAULA S GLADUE, V M D USDA, APHIS, Animal Care
VETERINARY MEDICAL OFFICER Inspector 1054

Date:
04 September 2012

Received By:

Title: (b) (6), (b) (7)(C) COMMERFORD AND SONS
REPORT DELIVERED BY E-MAIL 9-4-12

Date:
04 September 2012



United States Department of Agriculture
Animal and Plant Health Inspection Service

Customer: 1940
Inspection Date: Sep-04-12

Animals Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	001	R W COMMERFORD & SONS INC	Sep-04-12

Count	Species
000001	AFRICAN ELEPHANT
000002	ASIATIC ELEPHANT



Inspection Report

R W COMMERFORD & SONS INC

Customer ID: 1940

Certificate: 16-C-0006

Site: TRA 1

RED UNIT

P O BOX 188

Type: ROUTINE INSPECTION

GOSHEN, CT 06756

Date: Aug-02-2012

No non-compliant items identified during this inspection.

This inspection was conducted at the NJ State Fairgrounds in Augusta, NJ.

An exit briefing was conducted with the licensee.

Prepared By:

KERI LUPO, D V M USDA, APHIS, Animal Care

Date:

Title: VETERINARY MEDICAL OFFICER Inspector 6023

Aug-02-2012

Received By:

Date:

Title:



Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 1	RED UNIT	02-AUG-12

Count	Species
000001	AFRICAN ELEPHANT
000001	Total



Inspection Report

R W COMMERFORD & SONS INC

Customer ID: 1940

Certificate: 16-C-0006

Site: TRA 1

RED UNIT

P O BOX 188

ROUTE 4

GOSHEN, CT 06756

Type: ROUTINE INSPECTION

Date: Mar-25-2012

There were no non-compliant items identified during this inspection.

NOTE - The inspection took place at the XL Center in Hartford, CT and included all AWA species of animals with the Red Unit including one African Elephant named "Karen". Exit interview held on-site with facility personnel.

END OF REPORT

Prepared By:

PAULA S GLADUE, V M D USDA, APHIS, Animal Care

Title: VETERINARY MEDICAL OFFICER Inspector 1054

Date:

Mar-25-2012

Received By:

(b) (6), (b) (7)(C)

Title: TREASURER

Date:

Mar-25-2012



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: Mar-25-12
Animals Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 1	RED UNIT	Mar-25-12

Count	Species
000001	AFRICAN ELEPHANT

1	Site Total
---	------------



Inspection Report

R W COMMERFORD & SONS INC

Customer ID: 1940

Certificate: 16-C-0006

Site: TRA 2

GREEN UNIT

P O BOX 188

ROUTE 4

GOSHEN, CT 06756

Type: ROUTINE INSPECTION

Date: Mar-25-2012

There were no non-compliant items identified during the inspection.

NOTE - The inspection took place at the XL Center in Hartford, CT and included all AWA species of animals with the Green Unit including one Asian Elephant named "Beulah". Exit interview held on-site with facility personnel.

END OF REPORT

Prepared By:

PAULA S GLADUE, V M D USDA, APHIS, Animal Care

Title: VETERINARY MEDICAL OFFICER Inspector 1054

Date:

Mar-25-2012

Received By:

(b) (6), (b) (7)(C)

Title: TREASURER

Date:

Mar-25-2012



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: Mar-25-12
Animals Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 2	GREEN UNIT	Mar-25-12

Count	Specie
000001	AFRICAN CRESTED PORCUPINE
000001	ASIATIC ELEPHANT
000001	CAPYBARA
000001	COATI MUNDI
000001	COMMON ZEBRA
000001	EASTERN GREY KANGAROO
000001	SCIMITAR-HORNED ORYX
000001	YAK
000002	ALPACA
000002	EUROPEAN RABBIT
000002	LLAMA
000002	PATAGONIAN CAVY
000003	DOMESTIC DROMEDARY CAMEL
000004	ZEBU
000010	RING-TAILED LEMUR
000022	GOAT
000043	SHEEP OR MOUFLON

98	Site Total
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Inspection Report

R W COMMERFORD & SONS INC

Customer ID: 1940

Certificate: 16-C-0006

Site: 001

R W COMMERFORD & SONS INC

P O BOX 188

ROUTE 4

GOSHEN, CT 06756

Type: ROUTINE INSPECTION

Date: Jan-10-2012

There were no non-compliant items identified during the inspection.

NOTE - This was a focused inspection of the home site of the Licensee and included items and areas related to the care of the Elephants. The following Elephants were present: Minnie (Asian), Beulah (Asian), and Karen (African).

NOTE - Exit interview held 1/10/12 on-site with Licensee. Report delivered by e-mail on 1/10/12.

****END OF REPORT****

Prepared By:

PAULA S GLADUE, V M D USDA, APHIS, Animal Care

Date:

Title: VETERINARY MEDICAL OFFICER Inspector 1054

Jan-10-2012

Received By:

(b) (6), (b) (7)(C)

Date:

Title: REPORT DELIVERED BY E-MAIL 1/10/12

Jan-10-2012



Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	001	R W COMMERFORD & SONS INC	10-JAN-12

Count	Species
000001	AFRICAN ELEPHANT
000002	ASIATIC ELEPHANT
000003	Total



Inspection Report

R W COMMERFORD & SONS INC

Customer ID: 1940

Certificate: 16-C-0006

Site: 001

R W COMMERFORD & SONS INC

P O BOX 188

Type: ROUTINE INSPECTION

GOSHEN, CT 06756

Date: Oct-24-2011

Facility meets all standards and regulations at this time.

An exit briefing was conducted with the licensee.

Prepared By:

JAN P BALTRUSH, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR Inspector 1011

Date:

Oct-24-2011

Received By:

(b) (6), (b) (7)(C)

Title: SENT VIA E-MAIL

Date:

Oct-24-2011



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: 24-OCT-11
Animal Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	001	R W COMMERFORD & SONS INC	24-OCT-11

Count	Species
000001	CAPYBARA
000001	COATI MUNDI
000001	DOMESTIC YAK
000001	PIG
000001	RED KANGAROO
000002	EUROPEAN RABBIT
000003	DOMESTIC DROMEDARY CAMEL
000004	LLAMA
000004	ZEBU
000005	RING-TAILED LEMUR
000020	GOAT
000030	SHEEP OR MOUFLON
000073	Total



Inspection Report

R W COMMERFORD & SONS INC

Customer ID: 1940

Certificate: 16-C-0006

Site: TRA 1

RED UNIT

P O BOX 188

Type: ROUTINE INSPECTION

GOSHEN, CT 06756

Date: Sep-22-2011

Facility meets all standards and regulations at this time.

This inspection was conducted at the Eastern States Exposition Fairgrounds, Springfield, MA.

An exit briefing was conducted with the licensee.

Prepared By:

JAN P BALTRUSH, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR

Inspector 1011

Date:

Sep-22-2011

Received By:

(b) (6), (b) (7)(C)

Title: MANAGER

Date:

Sep-22-2011



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: 22-SEP-11
Animal Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 1	RED UNIT	22-SEP-11

Count	Species
000001	AFRICAN ELEPHANT
000001	COMMON ZEBRA
000001	COW OR OX
000001	DOMESTIC DROMEDARY CAMEL
000001	LLAMA
000001	SCIMITAR-HORNED ORYX
000001	ZEBU
000015	GOAT
000015	SHEEP OR MOUFLON
000037	Total



Inspection Report

R W COMMERFORD & SONS INC

Customer ID: 1940

Certificate: 16-C-0006

Site: TRA 2

GREEN UNIT

P O BOX 188

Type: ROUTINE INSPECTION

Date: Aug-05-2011

GOSHEN, CT 06756

There were no non-compliant items identified during this inspection.

NOTE - This inspection took place at the NJ State Fairgrounds in Augusta, NJ and included all AWA covered animals on-site including one Asian Elephant named "Beulah". Exit interview held 8/5/11 on-site with facility personnel.

END OF REPORT.

Prepared By:

PAULA S GLADUE, V M D USDA, APHIS, Animal Care

Date:

Title: VETERINARY MEDICAL OFFICER Inspector 1054

Aug-05-2011

Received By:

(b) (6), (b) (7)(C)

Date:

Title: COMMERFORD AND SONS

Aug-05-2011



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: 05-AUG-11
Animal Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 2	GREEN UNIT	05-AUG-11

Count	Species
000001	ASIATIC ELEPHANT
000001	COATI MUNDI
000001	EASTERN GREY KANGAROO
000002	DOMESTIC DROMEDARY CAMEL
000002	LLAMA
000002	ZEBU
000005	RING-TAILED LEMUR
000010	SHEEP OR MOUFLON
000017	GOAT
000041	Total



Inspection Report

R W COMMERFORD & SONS INC

Customer ID: 1940

Certificate: 16-C-0006

Site: TRA 1

RED UNIT

ROUTE 4

Type: ROUTINE INSPECTION

GOSHEN, CT 06756

Date: Feb-26-2011

NO NON-COMPLIANT ITEMS IDENTIFIED THIS INSPECTION.

This inspection was conducted at the Showplace Arena in Upper Marlboro, MD.

An exit briefing was conducted with the facility representative.

Prepared By:

GLORIA S MCFADDEN, D V M USDA, APHIS, Animal Care

Date:

Title: VETERINARY MEDICAL OFFICER Inspector 1048

Feb-28-2011

Received By:

(b) (6), (b) (7)(C)

Date:

Title: SENT VIA E-MAIL

Feb-28-2011



Animal Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 1	RED UNIT	26-FEB-11

Count	Species
000001	AFRICAN CRESTED PORCUPINE
000001	CAPYBARA
000001	COMMON ZEBRA
000001	DOMESTIC YAK
000001	EASTERN GREY KANGAROO
000001	MOUNTAIN COATI
000001	SCIMITAR-HORNED ORYX
000002	ALPACA
000002	ASIATIC ELEPHANT
000002	COW OR OX
000002	DOMESTIC DROMEDARY CAMEL
000002	EUROPEAN RABBIT
000002	LLAMA
000002	PATAGONIAN CAVY
000002	ZEBU
000011	RING-TAILED LEMUR
000024	GOAT
000026	SHEEP OR MOUFLON
000084	Total



Inspection Report

R W COMMERFORD & SONS INC

Customer ID: 1940

Certificate: 16-C-0006

Site: 001

R W COMMERFORD & SONS INC

ROUTE 4

Type: ROUTINE INSPECTION

GOSHEN, CT 06756

Date: Feb-03-2011

There were no non-compliant items identified during the inspection.

NOTE - This was a focused inspection of the home site of the Licensee and included items and areas related to the care of the Elephants. The following Elephants were present: Minnie (Asian), Beulah (Asian), and Karen (African).

NOTE - Exit interview held 2/3/11 on-site with Licensee and APHIS personnel Dr. Paula Gladue and Jan Baltrush. Report delivered by e-mail on 2/5/11. END OF REPORT.

Prepared By:

PAULA S GLADUE, V M D USDA, APHIS, Animal Care

Date:

Title: VETERINARY MEDICAL OFFICER Inspector 1054

Feb-05-2011

Received By:

(b) (6), (b) (7)(C)

Date:

Title: REPORT DELIVERED BY E-MAIL 2/5/11

Feb-05-2011



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: 03-FEB-11
Animal Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	001	R W COMMERFORD & SONS INC	03-FEB-11

Count	Species
000001	AFRICAN ELEPHANT
000002	ASIATIC ELEPHANT
000003	Total



Inspection Report

R W COMMERFORD & SONS INC

Customer ID: 1940

Certificate: 16-C-0006

Site: 001

R W COMMERFORD & SONS INC

ROUTE 4

Type: ROUTINE INSPECTION

GOSHEN, CT 06756

Date: Feb-03-2011

3.125 (a)

FACILITIES, GENERAL.

The facility must be constructed of such material and of such strength as appropriate for the animals involved. The indoor and outdoor housing facilities shall be structurally sound and shall be maintained in good repair to protect the animals from injury and to contain the animals.

At the time of this inspection the enclosure for the newly acquired African Crested Porcupine was in need of attention. The back section of the right wall was covered with a panel of white board. The bottom corner was detaching from the corner and appears to have been chewed by the porcupine. To ensure that the animal is not injured or ingests any of this material, this area needs to be addressed.

***To Be Corrected By: February 7, 2011

3.127 (d)

FACILITIES, OUTDOOR.

On or after May 17, 2000, all outdoor housing facilities (i.e., facilities not entirely indoors) must be enclosed by a perimeter fence that is of sufficient height to keep animals and unauthorized persons out. The fence must be constructed so that it protects the animals in the facility by restricting animals and unauthorized persons from going through it or under it and having contact with the animals in the facility, and so that it can function as a secondary containment system for the animals in the facility.

At the time of this inspection it was noted that the gates, of the perimeter fence, had been held in the open position by snow. It appears that the snow was plowed up and around the gates as they were in the open position. And now these gates can not be closed. This will need to be addressed.

*** This was corrected before we left the premise.

An exit briefing was conducted with the licensee.

Prepared By:

JAN P BALTRUSH, A C I

USDA, APHIS, Animal Care

Date:

Title:

ANIMAL CARE INSPECTOR

Inspector 1011

Feb-04-2011

Received By:

(b) (6), (b) (7)(C)

Date:

Title:

SENT VIA E-MAIL

Feb-04-2011



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: 03-FEB-11
Animal Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	001	R W COMMERFORD & SONS INC	03-FEB-11

Count	Species
000001	AFRICAN CRESTED PORCUPINE
000001	CAPYBARA
000001	COMMON ZEBRA
000001	COW OR OX
000001	DOMESTIC YAK
000001	EASTERN GREY KANGAROO
000001	MOUNTAIN COATI
000001	PIG
000001	SCIMITAR-HORNED ORYX
000002	ALPACA
000002	EUROPEAN RABBIT
000002	PATAGONIAN CAVY
000003	DOMESTIC DROMEDARY CAMEL
000004	LLAMA
000005	ZEBU
000011	RING-TAILED LEMUR
000044	GOAT
000044	SHEEP OR MOUFLON
000126	Total



Inspection Report

R W COMMERFORD & SONS INC

Customer ID: 1940

Certificate: 16-C-0006

Site: TRA 2

GREEN UNIT

ROUTE 4

Type: ROUTINE INSPECTION

GOSHEN, CT 06756

Date: Aug-26-2010

Facility meets all standards and regulations at this time.

This inspection was conducted at the Dutchess County Fairgrounds, Rhinebeck, NY.

An exit briefing was conducted with the licensee.

This is an electronic version of a hand written report.

Prepared By:

JAN P BALTRUSH, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR Inspector 1011

Date:

Sep-21-2010

Received By:

(b) (6), (b) (7)(C)

Title: OWNER

Date:

Aug-26-2010



United States Department of Agriculture Customer: 1940
Animal and Plant Health Inspection Service Inspection Date: 26-AUG-10
Animal Inspected at Last Inspection

Cust No	Cert No	Site	Site Name	Inspection
1940	16-C-0006	TRA 2	GREEN UNIT	26-AUG-10

Count	Species
000001	ASIATIC ELEPHANT
000001	EASTERN GREY KANGAROO
000001	LLAMA
000001	PIG
000002	DOMESTIC DROMEDARY CAMEL
000002	ZEBU
000006	RING-TAILED LEMUR
000010	SHEEP OR MOUFLON
000015	GOAT
000039	Total

From: [McKinnie, Carolyn - APHIS](#)
To: [Benson, Amy V - APHIS](#)
Subject: AC19-592 Complaint Response
Date: Tuesday, December 3, 2019 2:28:00 PM
Attachments: [AC19-592 Commerford complaint response sgnd.docm](#)
[AC19-592.pdf](#)

Hi Amy,

I'm unsure if you already closed this. If not, please close this complaint.

Thank you, Carolyn

Carolyn J McKinnie, DVM
Acting Director, AWO
Animal Care, APHIS, USDA
(740) 816-8363

From: [McKinnie, Carolyn - APHIS](#)
To: [Cole, Dana J - APHIS](#)
Subject: FW: AC19-587 Commerford elephant complaint response
Date: Monday, November 11, 2019 8:40:00 PM
Attachments: [AC19-587 Commerfords 10.19 JB signed.docm](#)

Dana, Revised per your recommendations- please let me know if you find this acceptable or if there are other changes you need. Carolyn

From: Hadjis, Tonya - APHIS
Sent: Monday, November 11, 2019 11:43 AM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>
Subject: RE: AC19-587 Commerford elephant complaint response

Hi Carolyn
Please let me know if anything more is needed for this complaint.

Thanks
Tonya

From: McKinnie, Carolyn - APHIS
Sent: Friday, November 8, 2019 3:28 PM
To: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Subject: FW: AC19-587 Commerford elephant complaint response

Hi Tonya,
Please see below. For each entry we need to (b) (5), DPP

Let me know if you have any questions,
Thanks, Carolyn

From: Cole, Dana J - APHIS
Sent: Friday, November 8, 2019 12:25 PM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>
Subject: RE: AC19-587 Commerford elephant complaint response

Yes, that's true. But some of the entries (b) (5), DPP

We can talk in person next week about my comments if you like. I'm heading out soon. Was supposed to log off at 1pm.

Have a great weekend!

Dana

From: McKinnie, Carolyn - APHIS
Sent: Friday, November 08, 2019 1:20 PM
To: Cole, Dana J - APHIS <dana.j.cole@usda.gov>
Subject: RE: AC19-587 Commerford elephant complaint response

Dana, This complaint and response is all after the fact. Inspectors were not at the Big E fair venue when she died. The only thing we can do in cases like this is to contact the facility and the AV, review medical and health records (if available) and go through each aspect of the complaint with them. This how I've normally seen things written up when we are not there to observe first hand. I'm not sure if I'm answering all your concerns but I'm here to discuss further if you would like...

From: Cole, Dana J - APHIS
Sent: Friday, November 8, 2019 12:03 PM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>
Subject: RE: AC19-587 Commerford elephant complaint response

Thanks Carolyn. I have a couple comments. My main concern is that (b) (5), DPP

[REDACTED]

[REDACTED]

Let me know of questions/concerns. Thanks! Dana

From: McKinnie, Carolyn - APHIS
Sent: Thursday, November 07, 2019 9:49 AM
To: Cole, Dana J - APHIS <dana.j.cole@usda.gov>
Subject: Fwd: AC19-587 Commerford elephant complaint response

Hi Dana,
Please see the attached compliant response for your review.
Let me know of any concerns. Thanks, Carolyn

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From: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Sent: Thursday, November 7, 2019 6:42 AM
To: McKinnie, Carolyn - APHIS
Subject: AC19-587

Carolyn,
Enclosed is the updated (dated 7-Nov-19) complaint response. Please let me know if you've any

questions.

Thanks

Tonya

From: Hadjis, Tonya - APHIS

Sent: Wednesday, November 6, 2019 11:51 AM

To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>

Subject: AC19-587

Carolyn,

Enclosed is the original complaint and the response, please review. On the original complaint document, please scroll all of the way down as there is another complaint that was rolled into Ac19-587.

In addition, expect another, smaller complaint that we will send the response up later as well. One inspector is on sick leave today, so there is some delay due to that.

Thanks

Tonya

Tonya Hadjis, DVM

Supervisory Animal Care Specialist

USDA/APHIS/Animal Care

781-999-1587



USDA-APHIS-Animal Care



Application Kit Provided: Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>	
Inspector: Jan Baltrush	Date: 4-Nov-19
Reviewed By:	Date:

From: [McKinnie, Carolyn - APHIS](#)
To: [Cole, Dana J - APHIS](#)
Subject: FW: Complaint AC19-592 Commerford & Sons 1940
Date: Friday, November 8, 2019 4:41:00 PM
Attachments: [AC19-592.pdf](#)
[AC19-592 Commerfords.docm](#)

Second complaint for Commerford. This is a much shorter response and each allegation response lists where info came from. We can discuss next week while I'm there if you like...
Thanks, Carolyn

From: Hadjis, Tonya - APHIS
Sent: Friday, November 8, 2019 1:05 PM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>
Subject: FW: Complaint AC19-592 Commerford & Sons 1940

Carolyn,
Enclosed is the other complaint AC19-592 that was filed before Beulah died and had been sent originally to the state of CT.

Please let me know of any questions!
Tonya

From: Benson, Amy V - APHIS
Sent: Friday, September 27, 2019 11:18 AM
To: Baltrush, Jan J - APHIS <jan.p.baltrush@usda.gov>; Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Cc: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>; Neafsey, Michael F - APHIS <michael.f.neafsey@usda.gov>
Subject: Complaint AC19-592 Commerford & Sons 1940

Please see the attached files.

Sincerely,

Amy Benson
Inspection & Licensing Assistant
Program Support
USDA APHIS Animal Care
Phone: (970) 494-7478

Please send all paperwork to our new mailing address:

Fort Collins: 2150 Centre Ave., **Building B, 3W11**, Fort Collins CO, 80526

Our previous email addresses have been combined. For future communication, please use:

Email: Animalcare@usda.gov

[Join the Animal Care Stakeholder Registry and receive emails on topics of interest](#)

We are happy to announce that we have introduced an online self-service tool to assist you in determining the appropriate application to complete as required under the Animal Welfare Act (AWA).

Visit efile.aphis.usda.gov/LRAssistant to complete the 5 to 15 minute questionnaire that will recommend the specific license and/or registration types required (if any) and provides links to download those applications.



USDA-APHIS-Animal Care



ANIMAL WELFARE COMPLAINT			
Complaint No. AC19-592	Date Entered: 27-Sep-19	Processed By: AVB	
Referred To: Baltrush / Hadjis		Reply Due: 29-Oct-19	
Facility or Person Complaint Filed Against			
Name: R W Commerford & Sons		Customer No.: 1940	License No.: 16-C-0006
Address: PO Box 188, Route 4		Email Address: darlenecommerford@msn.com	
City: Goshen	State: CT	Phone No.: (860) 491-3421	
Complainant Information			
Name: Bruce Sherman		Organization: CT Dept. of Agriculture	
Address: 450 Columbus Blvd. Suite 702		Email Address: Bruce.Sherman@ct.gov	
City: Hartford	State: CT	Phone No.: (860) 713-2556	
How was the Complaint received? Email			
Details of Complaint: <u>SEE ATTACHED</u>			
Results: * Complainant was concerned that Beulah was used for rides – Licensee stated that she had not been used for rides in over 2 yrs. * Complainant was concerned that Beulah had to stand on hard concrete for 12 hours a day – Licensee stated that the fairgrounds substrate at the Big E is asphalt. Licensee stated that she also had access to the grass and tree lined area, and licensee stated Beulah's handler would lead her to those areas whenever Beulah signaled in that direction, indicating that she wanted to go to the grass. * Complainant was wondering why they have not been closed down – The USDA Animal Care has an enforcement process in place to ensure that all licensed facilities comply with the AWA. In order to do that, inspectors conduct unannounced inspections and cite any deficiencies. If deficiencies remain uncorrected at subsequent inspections, APHIS considers legal action.			
Application Kit Provided: Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>			
Inspector: Jan Baltrush		Date: 8-Nov-19	
Reviewed By:		Date:	

From: [McKinnie, Carolyn - APHIS](#)
To: [Cole, Dana J - APHIS](#)
Subject: Fwd: AC19-587 Commerford elephant complaint response
Date: Thursday, November 7, 2019 11:49:23 AM
Attachments: [AC19-587.pdf](#)
[AC19-587 Commerfords 10.19.pdf](#)

Hi Dana,

Please see the attached compliant response for your review.
Let me know of any concerns. Thanks, Carolyn

Get [Outlook for iOS](#)

From: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Sent: Thursday, November 7, 2019 6:42 AM
To: McKinnie, Carolyn - APHIS
Subject: AC19-587

Carolyn,

Enclosed is the updated (dated 7-Nov-19) complaint response. Please let me know if you've any questions.

Thanks

Tonya

From: Hadjis, Tonya - APHIS
Sent: Wednesday, November 6, 2019 11:51 AM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>
Subject: AC19-587

Carolyn,

Enclosed is the original complaint and the response, please review. On the original complaint document, please scroll all of the way down as there is another complaint that was rolled into Ac19-587.

In addition, expect another, smaller complaint that we will send the response up later as well. One inspector is on sick leave today, so there is some delay due to that.

Thanks

Tonya

Tonya Hadjis, DVM

Supervisory Animal Care Specialist

USDA/APHIS/Animal Care

781-999-1587



USDA-APHIS-Animal Care



ANIMAL WELFARE COMPLAINT			
Complaint No. AC19-587	Date Entered: 23-Sep-19	Processed By: AVB	
Referred To: Baltrush / Hadjis		Reply Due: 25-Oct-19	
Facility or Person Complaint Filed Against			
Name: R W Commerford & Sons Inc		Customer No.: 1940	License No.: 16-C-0006
Address: PO Box 188		Email Address: darlenecommerford@msn.com	
City: Goshen	State: CT	Phone No.: (860) 491-3421	
Complainant Information			
Name: Jill Alibrandi / Anonymous		Organization:	
Address:		Email Address: jalibran@us.ibm.com	
City:	State:	Phone No.: (203) 216-2393	
How was the Complaint received? Email			
Details of Complaint: <u>SEE ATTACHED</u>			
Results:			
Application Kit Provided: Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>			
Inspector:			Date:
Reviewed By:			Date:



Animal and Plant
Health Inspection
Service

Animal Care
4700 River Road
Riverdale, MD
20737

September 23, 2019

Jill Alibrandi



Dear Complainant:

Thank you for your correspondence dated 23-Sep-19. We are reviewing your concerns and assigned tracking number AC19-587. Please allow us enough time (30 to 60 days) to thoroughly look into your concerns. You may submit a request to the Animal and Plant Health Inspection Service (APHIS) Freedom of Information Act (FOIA) office to obtain any publically available information regarding our review.

FOIA requests can be submitted three ways:

1. Web Request Form: <https://efoia-pal.usda.gov/App/Home.aspx>
2. Fax: (301) 734-5941
3. U.S. Mail:
USDA-APHIS-FOIA
4700 River Road, Unit 50
Riverdale, MD 20737

Should you have any questions regarding the APHIS FOIA process or need assistance using the Web Request Form **please contact the APHIS FOIA office at 301-851-4102.**

Animal Care is a program within the U.S. Department of Agriculture (USDA) that directs activities to ensure compliance with and enforcement of the Animal Welfare Act and the Horse Protection Act. Animal Care establishes standards of humane treatment for regulated animals and monitors and achieves compliance through inspections, enforcement, education, and cooperative efforts under the Acts.

Please be assured that we will look into your concern(s) and take appropriate action(s).

Thank you for your interest into the humane treatment of these animals.

Sincerely,

Betty Goldentyer
Associate Deputy Administrator
Animal Care

From: [Jill Alibrandi](#)
To: [Benson, Amy V - APHIS](#)
Cc: [jillalibrandi](#)
Subject: RW Commerford - Minnie, Beulah and Karen - 3 Elephants - 2 now dead
Date: Monday, September 23, 2019 3:29:42 PM

Hi Amy - Per our phone conversation, I submitted a complaint on RW Commerford Petting Zoo on September 19, 2019, and I never received an email notification that the USDA received it and I did submit this through the USDA website. I have previously filed complaints in 2014 and 2017 against this same organization, and have never received anything back. I also have reached out to Jan Baltrush a CT USDA investigator on her cell phone numerous times about Commerford and I have repeatedly been told to file a formal complaint via the Fort Collins office.

I need to re-submit this request formally through yourself per your request since I do not want to get this complaint lost in the system either. THIS IS A LIFE OR DEATH SITUATION!!

At 3pm on September 14, 2019, I walked into the Big E and walked over to the Commerford Zoo exhibit and immediately saw Beulah the 54 year old elephant laying down and not moving but a few swishes of her tail on a small patch of grass next to the parking lot and behind a busy road. I had been standing there for at least 20-30 minutes and she had not moved at all. She was also quite thin for an elephant. She had no food or water nearby other then piss-soaked hay. I took the following footage of her and was immediately told to leave the area after it was taken.

I also put calls into the Big E, and West Springfield Animal Control and stated that it was a dire situation and that Beulah was clearly sick and in my opinion on deaths door. Animal Control said there was nothing she could do, and that these animals were regularly checked to make sure they had food and water. Another video was taken on Instagram that shows her not well on Saturday and she is drooling at the mouth. When I saw her in person, even though I am not an elephant specialist that she was clearly in distress. Of course, my conclusions were correct and she 12 hours later. She should NOT have been brought to this Fair and they had every intention of using her for the full 3 week duration.

September 14th Footage:

Video Footage:

(b) (6), (b) (7)(C)

On Sunday morning at 9am, September 15, 2019, Beulah collapsed at least 3 times, they forced her up and she finally collapsed for the last time and died. They covered her up with a tarp at some point on Sunday, and she was taken out with a bucket truck after the fair closed and taken away. SHE WAS CLEARLY NOT WELL and nothing was done.

Furthermore, it was also uncovered that Karen, the younger 38 year old elephant died in March 2019 and not reported as far as I know. That is two elephants that died in their care in 6 months and we now know that Minnie the 3rd elephant is in clear and present danger. She must be inspected off site by an elephant care specialist and sent to an accredited sanctuary where she can get the proper vet care and attention before she is killed too.

Additional Radio/Media Coverage:

https://www.westernmassnews.com/news/animal-rights-groups-speak-out-after-beulah-asian-elephant-at/article_f551c5c6-da7a-11e9-9447-7b0c6c8d62b7.html
<https://www.spreaker.com/user/wpro/jill-alibrandi>

Please call me back after you review this information. I can be reached at 203-216-2393. Time is of the essence to remove Minnie from their 'care' and get her to a safe place. I know there have been numerous USDA violations against them over the past 30 years, and now we have two dead elephants - one 38 and one 54 that did NOT die of natural causes.

Thank you,

Jill Alibrandi







From: noreply@aphis.usda.gov
To: [ACEAST](#)
Subject: USDA APHIS ANIMAL CARE - Animal Welfare Complaint Submission
Date: Friday, August 30, 2019 4:39:00 PM

Details of complaint:

- Name of USDA licensee/registrant: R W Commerford & Sons Inc
- USDA license/registration number:
- City/State:Goshen, CT
- Complaint details:Im very concerned about the welfare of three elephants at Commerford Zoo. Pictures of these animals on social media show clear evidence of both (1) physical and psychological harm - including the use of bullhooks, which while not intrinsically illegal are widely condemned by scientists, and abuse of which could fall within the mandate of the Animal Welfare Act (2) unsuitable and unsanitary conditions, including being kept in windowless indoor spaces with concrete floors. Moreover there seem to be grounds now to fear that two of the elephants have become so ill are so injured or have become so disturbed by their treatment that they have reportedly not been seen publicly for a year.

Given the Zoo's track record of being sanctioned by USDA in the past, I would be most grateful if you could take all steps to ensure that the elephants are safe and properly husbanded and that there has been no recurrence of unlawful, abusive treatment. Many thanks for your kind attention to this urgent case.

Submitted To: aceast@aphis.usda.gov

Complaint Contact Information:

Can Contact Complainer: No, I would like to remain anonymous.

Name:

Organization:

Street Address:

Apt/Suite:

City / State / Zip: , ,

Phone Number:

Email:

Submitted on: Aug 30, 2019 8:37:38 PM UTC



USDA-APHIS-Animal Care



ANIMAL WELFARE COMPLAINT			
Complaint No. AC19-587	Date Entered: 23-Sep-19	Processed By: AVB	
Referred To: Baltrush / Hadjis		Reply Due: 25-Oct-19	
Facility or Person Complaint Filed Against			
Name: R W Commerford & Sons Inc		Customer No.: 1940	License No.: 16-C-0006
Address: PO Box 188		Email Address: darlenecommerford@msn.com	
City: Goshen	State: CT	Phone No.: (860) 491-3421	
Complainant Information			
Name: Jill Alibrandi / Anonymous		Organization:	
Address:		Email Address: jalibran@us.ibm.com	
City:	State:	Phone No.: (203) 216-2393	
How was the Complaint received? Email			
Details of Complaint: <u>SEE ATTACHED</u>			
Results: *Complainant was concerned that Beulah is sick and maltreated – Based on the review of records and speaking with the Licensee, there was no evidence that Beulah was showing any signs of illness or that she was maltreated. According to the Attending Veterinarian, Beulah was in good condition. *Complainant was concerned that Beulah was lying down – Photograph provided by complainant showed Beulah lying down on a slightly inclined grassy area. Beulah's handler is also seen in the photo right near her head. According to the licensee, lying down on grass as seen in that photo was not an unusual behavior for Beulah. *Complainant was concerned that she was thin for an elephant – According to the attending veterinarian she was in good body condition and she was not thin. *Complainant was concerned that there was no food or water present – Beulah had access to fresh hay throughout the day and was provided grain twice a day. Fresh water was provided to the elephant via a hose. When Beulah was thirsty she would pick up the hose and the Licensee would turn the water on. She had unlimited access to the water until she dropped the hose. *Complainant was concerned that there was urine soaked hay in the pen –			



USDA-APHIS-Animal Care



In the photos there is hay present. However, it cannot be determined from the photos if the hay was urine soaked or not. Beulah was provided with fresh hay throughout the day. There was no need for her to eat hay that was contaminated by urine.

*Complainant was concerned that Beulah was drooling from the mouth –

According to the licensee and the attending veterinarian, Beulah did drool on occasion but there was no medical condition to cause the drooling.

*Complainant was concerned that she collapsed 3 times and they forced her back up –

According to the licensee on the day she died, Beulah went down twice, within a minute to a minute and a half. The second time she went down she did not get back up. The licensee did not force her to get back up either time she went down, nor was any type of equipment available or used to force her to get back up.

*Complainant was concerned that she was covered up and taken out with a bucket truck –

Yes, Beulah was covered up after her death. This incident happened in the morning, just as the fair was opening. Steps were taken by the Licensee to place visual and physical barriers around the trailers and the area where Beulah was located (including the use of a tarp to cover her), and the public area of the fairground. Once the fairgrounds were closed for the day, equipment was used to place slings to support, then carefully lift and place her body onto a truck.

*Complainant was concerned that Karen had died in March 2019 and it was not reported –

Licensee had informed USDA several months prior to March 2019 that Karen was under the care of the Attending Veterinarian for a medical condition. Licensee also contacted USDA on the same day that Karen died to report that she had passed.

*Complainant is concerned that Minnie is in clear danger –

Inspectors have recently seen Minnie, she was not showing any abnormal behaviors and looked in good condition. According to the Licensee she is acting normally and is eating very well.

*Complainant was concerned that the elephants are experiencing physical and psychological harm from the use of the bullhook –

The inspectors did not observe any evidence that physical or psychological harm had been done to the elephant.

*Complainant was concerned that the elephant is being housed in unsuitable and unsanitary conditions. They are in a windowless indoor space and on concrete floors –

The complainant did not identify a specific location or venue for this allegation. The following pertains to the elephant housing facility at the home site. The elephant pen inside the barn at the home site was clean and sanitary at the time of the inspection. Licensee stated that the pen is cleaned two or more times throughout the day. There are windows in the walls of the elephant pen in the barn as well as windows in the large door to the barn. The floor of the elephant pen is concrete equipped with temperature-controlled radiant heating. The elephant is provided access to an outdoor enclosure containing natural vegetation on a daily basis; access and length of time in the outdoor enclosure is dependent on the weather conditions.

Application Kit Provided:

Yes: ☐

No: ☒

Inspector:

Date:



USDA-APHIS-Animal Care



Jan Baltrush	4-Nov-19
Reviewed By: Tonya Hadjis	Date: 7-Nov-19

From: [Cole, Dana J - APHIS](#)
To: [McKinnie, Carolyn - APHIS](#)
Subject: RE: AC19-587 Commerford elephant complaint response
Date: Friday, November 8, 2019 3:03:28 PM
Attachments: [AC19-587 Commerfords 10.19cmts.pdf](#)

Thanks Carolyn. I have a couple comments. My main concern is (b) (5), DPP
[REDACTED]
[REDACTED]
[REDACTED]

Let me know of questions/concerns. Thanks! Dana

From: McKinnie, Carolyn - APHIS
Sent: Thursday, November 07, 2019 9:49 AM
To: Cole, Dana J - APHIS <dana.j.cole@usda.gov>
Subject: Fwd: AC19-587 Commerford elephant complaint response

Hi Dana,
Please see the attached compliant response for your review.
Let me know of any concerns. Thanks, Carolyn

Get [Outlook for iOS](#)

From: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Sent: Thursday, November 7, 2019 6:42 AM
To: McKinnie, Carolyn - APHIS
Subject: AC19-587

Carolyn,
Enclosed is the updated (dated 7-Nov-19) complaint response. Please let me know if you've any questions.
Thanks
Tonya

From: Hadjis, Tonya - APHIS
Sent: Wednesday, November 6, 2019 11:51 AM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>
Subject: AC19-587

Carolyn,
Enclosed is the original complaint and the response, please review. On the original complaint document, please scroll all of the way down as there is another complaint that was rolled into Ac19-587.

In addition, expect another, smaller complaint that we will send the response up later as well. One inspector is on sick leave today, so there is some delay due to that.

Thanks

Tonya

Tonya Hadjis, DVM

Supervisory Animal Care Specialist

USDA/APHIS/Animal Care

781-999-1587

From: [McKinnie, Carolyn - APHIS](#)
To: [Cole, Dana J - APHIS](#)
Subject: RE: Response Needed: Questions about Commerford Zoo from Sen. Blumenthal
Date: Monday, October 28, 2019 4:04:00 PM
Attachments: [Open AC19-592.pdf](#)
[image001.png](#)

Here's what I found- see attached. It was submitted by Bruce Sherman, Connecticut Dept. of AG on behalf of the CT AG who forwarded a citizens complaint from (b) (6), (b) (7)(C) Of note, it appears that Beulah died at the fair.

"The complainant references the care provided by the Cummerford Zoo for their elephants and, specifically, opposition to exhibition of the elephants at the Eastern States Exposition (BIG E) in West Springfield, MA. The complainant also cites the death of Cummerford's elephant "Beulah" while at this year's Big E."

From: McKinnie, Carolyn - APHIS
Sent: Monday, October 28, 2019 12:31 PM
To: Cole, Dana J - APHIS <dana.j.cole@usda.gov>
Subject: RE: Response Needed: Questions about Commerford Zoo from Sen. Blumenthal

Let me get that information for you...I'm working on getting the original complaint

From: Cole, Dana J - APHIS
Sent: Monday, October 28, 2019 12:28 PM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>
Subject: RE: Response Needed: Questions about Commerford Zoo from Sen. Blumenthal

Regarding the complaint in this case...who made the complaint and why?

Thanks! Dana

From: McKinnie, Carolyn - APHIS
Sent: Monday, October 28, 2019 12:34 PM
To: Cole, Dana J - APHIS <dana.j.cole@usda.gov>
Subject: RE: Response Needed: Questions about Commerford Zoo from Sen. Blumenthal

See below in blue following Anne's questions.

(b) (6), (b) (7)(C)



From: Dunigan, Anne H - APHIS

Sent: Monday, October 28, 2019 9:51 AM

To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>

Subject: Response Needed: Questions about Commerford Zoo from Sen. Blumenthal

Good morning Carolyn and Dana—Could you please help with a response on these questions

1. What is USDA's role in ensuring that the cause of death is determined? (b) (5), DPP
[REDACTED]
2. How does USDA ensure that the necropsy veterinarian renders an independent opinion?
(b) (5), DPP
[REDACTED]

I have requested the inspection reports from Program Support. Thanks, Anne

From: Hart, Sydney - APHIS

Sent: Monday, October 28, 2019 8:09 AM

To: Dunigan, Anne H - APHIS <anne.dunigan@usda.gov>

Cc: Needham, Christopher M - APHIS <christopher.m.needham@usda.gov>

Subject: Questions about Commerford Zoo from Sen. Blumenthal

Hi Anne,

Senator Richard Blumenthal's office had some additional questions in regards to Commerford Zoo:

1. What is USDA's role in ensuring that the cause of death is determined?
2. How does USDA ensure that the necropsy veterinarian renders an independent opinion?
3. The link to past reports only contained inspections dating back to 2017. Could you send us reports dating back to 2012?

Is there any information I can pass along?

Thanks,



SYDNEY HART

APHIS ▪ LPA ▪ Government Affairs

Cubicle 2B-02.3, Riverdale

Room 1157, South Building

☎ 301-851-4017

✉ Sydney.Hart@usda.gov

From: [Baltrush, Jan J - APHIS](#)
To: [Hadjis, Tonya - APHIS](#); [Gladue, Paula S - APHIS](#)
Subject: Commerford's complaint responses
Date: Monday, November 4, 2019 8:33:15 PM
Attachments: [AC19-587 Commerfords 10.19.docm](#)
[AC19-592 Commerfords 10.19.docm](#)

Hi Tonya and Paula,

Here are the responses let me know what needs to be reworked.

Jan

Jan Baltrush
Animal Care Inspector
586 Oronoke Rd
Waterbury, CT 06708
203-757-1765
(b) (5), DPP



USDA-APHIS-Animal Care



ANIMAL WELFARE COMPLAINT			
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Facility or Person Complaint Filed Against			
Name: R W Commerford & Sons Inc		Customer No.: 1940	License No.: 16-C-0006
Address: PO Box 188		Email Address: darlenecommerford@msn.com	
City: Goshen	State: CT	Phone No.: (860) 491-3421	
Complainant Information			
Name: Jill Alibrandi / Anonymous		Organization:	
Address:		Email Address: jalibran@us.ibm.com	
City:	State:	Phone No.: (203) 216-2393	
How was the Complaint received? Email			
Details of Complaint: SEE ATTACHED			
<p>Results:</p> <p>Complainant was concerned that Beulah is sick and maltreated – While reviewing records and speaking to owners there was no evidence that she was showing any signs of illness or was maltreated. According to their attending veterinarian she was in good condition.</p> <p>Complainant was lying down – On Saturday, 9/15/19, Beulah walked over to the hillside behind the trailers and laid down. In the photo you can see that her handler is right by her head. She was using her trunk to investigate the substrate under the bushes. She was also grabbing dirt and throwing it onto herself. According to the owners, she was in that position for ~45 minutes. This was a normal behavior of hers, therefore, he was not concerned.</p> <p>Complainant was concerned that she was thin for an elephant – According to the attending veterinarian she was in very good condition.</p> <p>Complainant was concerned that there was no food or water present – The animals are fed grain twice a day and have access to hay throughout the day. The water is provided to the elephant via a garden hose. When Beulah was thirsty she would pick up the hose and the owners would turn the water on. She had access to the water until she dropped the hose.</p>			



USDA-APHIS-Animal Care



Complainant was concerned that there was urine soaked hay in the pen – In the photos there is hay present. However, it could not be determined if it was urine soaked or not. Fresh flakes of hay were given to Beulah throughout the day. There was no need for her to eat contaminated hay.

Complainant was concerned that Beulah was drooling from the mouth – According to the owners, and the attending veterinarian, she would drool on occasion. There was no medical reason for this. This was a normal occurrence for Beulah.

Complainant was concerned that she collapsed 3 times and they forced her back up – According to the owner, she went down twice, within a minute to a minute and a half. The second time she went down she did not recover. There was no time, nor equipment available, to force her back up.

Complainant was concerned that she was covered up and taken out with a bucket truck – Yes, she was covered up. This incident happen in the morning, just as the fair was opening. The tent sides were hung between, and around the trailers. Six foot tall barrier fence panels were erected around her and a tarp laid over this fencing. Once the fairgrounds were closed a pay loader, with an articulating crane, was used to put slings placed under her. She was then carefully lifted onto a flatbed truck.

Complainant was concerned that Karen had died in March 2019 and it was not reported – Mr. Commerford had informed me several months before Karen passed that she was under medical treatment. Mr. Commerford also called me the day she passed. All of this information was promptly relayed up to Animal Care management.

Complainant is concerned that Minnie is in clear danger – Inspectors have recently seen Minnie, she is not showing any abnormal behaviors and looks to be in good condition. According to the owners she is eating very well.

Complainant was concerned that the elephants are experience physical and psychological harm from the use of the bullhook – According to the owners, the ankus is used as a “guide.” There is no evidence of physical or psychological harm being done to these animals.

Complainant was concerned that the elephant is being housed in unsuitable and unsanitary conditions. They are in a windowless indoor space and on concrete floors – The elephant barn is cleaned at least twice a day, if not more often. Within the elephant area of the barn there are 3 windows above the cement block walls. There is a garage door that has 4 windows. There are also 5 stalls that each have a window. A portion of the concrete floor is equipped with radiant heating.

Application Kit Provided:

Yes: ☐

No: ☒

Inspector:

Jan Baltrush

Date:

4-Nov-19

Reviewed By:

Date:



USDA-APHIS-Animal Care



Complainant was concerned that there was urine soaked hay in the pen – In the photos there is hay present. However, it could not be determined if it was urine soaked or not. Fresh flakes of hay were given to Beulah throughout the day. There was no need for her to eat contaminated hay.

Complainant was concerned that Beulah was drooling from the mouth – According to the owners, and the attending veterinarian, she would drool on occasion. There was no medical reason for this. This was a normal occurrence for Beulah.

Complainant was concerned that she collapsed 3 times and they forced her back up – According to the owner, she went down twice, within a minute to a minute and a half. The second time she went down she did not recover. There was no time, nor equipment available, to force her back up.

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Complainant was concerned that the elephants are experiencing physical and psychological harm from the use of the bullhook – According to the owners, the ankus is used as a “guide.” There is no evidence of physical or psychological harm being done to these animals.

Complainant was concerned that the elephant is being housed in unsuitable and unsanitary conditions. They are in a windowless indoor space and on concrete floors – The elephant barn is cleaned at least twice a day, if not more often. Within the elephant area of the barn there are 3 windows above the cement block walls. There is a garage door that has 4 windows. There are also 5 stalls that each have a window. A portion of the concrete floor is equipped with radiant heating. This facility also has an outdoor enclosure behind the barn. This area has been left natural. A small watering hole has been established and the vegetation is allowed to grow naturally. The elephants are given access to this area on a daily basis. The length of time in this area is dependant upon the weather.

Application Kit Provided:

Yes: ☐ No: ☒

Inspector:
Jan Baltrush

Date:
4-Nov-19

Reviewed By:

Date:

From: [Sherman, Bruce](#)
To: [Baltrush, Jan J - APHIS](#)
Subject: Commerford
Date: Tuesday, October 1, 2019 1:54:30 PM
Attachments: [Commerford letter notice of risk of losing exemption Im md.docx](#)

Hi Jan,

I think you were copied on the attached letter that DEEP sent to Commerford in which they asked that Commerford show that they comply with the requirements of the exemption to be classified as an exhibitor.

Sec. 26-55-6. Importation, possession or liberation of wild birds, mammals, reptiles, amphibians and invertebrates

(f) **Exhibitors.** In order to qualify for the exemptions provided in subsection (b) of this section, an exhibitor shall meet the following minimum requirements:

(1) For purposes of importing or possessing mammals, holds a Class C ("exhibitor's") license issued by the United States Department of Agriculture pursuant to the Animal Welfare Act (7 USC 54), and a copy of the last inspection report signed and dated by the United States Department of Agriculture;

(2) Holds all municipal, state, or federal permits or licenses required to possess wild animals;

(3) Complies with all applicable laws of the municipality in which the housing facility is located;

(4) Has conducted public programs involving the exhibition of the wild animals subject to this section and in the exhibitor's possession, and maintains documentation thereof. Such public programs shall meet the following criteria:

(A) Fifty programs or before 1,000 attendees within the first two years of possession of a Category One or Two Wild Animal, or, in the case of mammals, attaining a Class C license as described in subdivision (1) of this subsection; and

(B) Fifty programs or before 1,000 attendees in the third year of possession of a Category One or Two Wild Animal, or, in the case of mammals, attaining a Class C license, as described in subdivision (1) of this subsection, and in each calendar year thereafter;

(5) Maintains the wild animal under conditions that give the owner or keeper exclusive control over them at all times as to prevent loss or risk of injury to the public;

(6) Maintains a housing facility consistent with the design standards established pursuant to the United States Animal Welfare Act (7 USC 54) and compliant with state and local health and building codes;

(7) Maintains liability insurance of a least \$1 million;

(8) Maintains a plan for the recapture or destruction of any such wild animal in the event of loss;

(9) Maintains a plan for the maintenance or disposition of all wild animals in the event of the owner or keeper's absence, illness, or death;

(10) Maintains documentation to verify a minimum of one year of practical husbandry or a minimum of 300 hours of formalized training or apprenticeship in the care, feeding, handling and husbandry of the species to be possessed or of another species that is substantially similar to the species to be possessed in size, characteristics, care and nutritional requirements. A Bachelor of Science or higher degree in a relevant biological science, obtained at an accredited institution of higher learning, may be substituted for 150 hours of apprenticeship. Documentation shall consist of:

(A) A description of the specific experience acquired;

(B) The date and time the experience was obtained and the specific locations where acquired; and

(C) A minimum of two references from a professional organization or governmental institution such as a university, zoological association, or federal agency;

(11) Has not been convicted of violating wild animal laws or regulations of any state, the federal government or other country pertaining to the importation, possession, liberation, or welfare of wild animals;

(12) Maintains complete and accurate records for each wild animal in its possession which identify:

(A) The species, sex, age, and lineage of each wild animal;

(B) Date of birth and acquisition;

(C) If applicable, the name and address of any person who has previously possessed the wild animal and date of transfer; and

(D) The date of the death, loss or transfer to another person of each wild animal; and

(13) Maintain records required by this subsection in chronological order, for a minimum of five years after the date of death, loss, or transfer of any wild animal and shall make such records available for inspection at any reasonable time upon request of the commissioner or the commissioner's designee

BRUCE A. SHERMAN, DVM, MPH
DIRECTOR, BUREAU OF REGULATORY SERVICES
CT DEPARTMENT OF AGRICULTURE
450 COLUMBUS BLVD., SUITE 702
HARTFORD, CT 06103

Bureau Tel. #'s: (860) 713-2504, (860) 713-2506

Direct Tel. #: (860) 713-2556
FAX #: (860) 706-5745
Email: bruce.sherman@ct.gov

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William R. Commerford
President
R.W. Commerford & Sons, Inc.
1051 Pothier Road
Torrington, CT 06790

September 19, 2019

P. Timothy Commerford
Vice President
R.W. Commerford & Sons, Inc.
P.O. Box 188
Goshen, CT 06756
commerfordzoo@yahoo.com

Re: Facility Located at 48 Torrington Road, Goshen, CT

Dear Gentlemen:

Pursuant to Section 26-55-6(f) of the Regulations of Connecticut State Agencies ("RCSA"), the staff of the Department of Energy and Environmental Protection ("DEEP") Wildlife Division understand that that R.W. Commerford & Sons, Inc., a domestic corporation, is operating under the Connecticut exhibitor's exemption. This exemption presumes that you, as the operator, are meeting the minimum requirements of Section 26-55-6(f)(1) to (13), inclusive, of the RCSA, including experience in the care, feeding, handling and husbandry of the species possessed. In addition, you are expected to maintain a housing facility consistent with the requisite standards established under federal law, and to comply with state and local health and building codes at the facility located at 48 Torrington Road, Goshen, Connecticut ("Facility").

On September 18, 2019, media outlets reported that "Beulah," an elephant, died, and it is our understanding that she was an animal in your care and possession. We are requesting complete and accurate records related to Beulah's birth, acquisition by your Facility, and death.

We are requesting that you demonstrate compliance with Section 26-55-6(f)(1) to (13), inclusive, of the RCSA. Please be aware that failure to do so may jeopardize your status as an exempt exhibitor. R.W. Commerford & Sons, Inc. shall submit to Wildlife Director Jenny Dickson at the address below, within ten (10) days of receipt of this letter, records demonstrating how this Facility is currently meeting the minimum requirements of Section 26-55-6(f)(1) to (13), inclusive, of the RCSA, including subdivision (12) that requires maintaining complete and accurate records for each wild animal in your possession.

Ms. Jenny Dickson
Director Wildlife Division
Department of Energy and Environmental Protection
Bureau of Natural Resources
79 Elm Street
Hartford, Connecticut 06106-5127

Please be aware that R.W. Commerford & Sons, Inc.'s Facility may be subject to unannounced State of Connecticut inspections to verify compliance with all applicable local, state and federal laws and regulations.

Sincerely,

Susan Whalen
Deputy Commissioner
Environmental Conservation

cc: United States Department of Agriculture,
Jan Baltrush
Connecticut Department of Agriculture's State Veterinarian,
Mary Jane Lis
Connecticut Department of Public Health's State Public Health Veterinarian,
Jocelyn Mullins

Enclosure: RCSA Section 26-55-6, also available electronically at
https://eregulations.ct.gov/eRegsPortal/Browse/RCSA/Title_26Subtitle_26-55Section_26-55-6/

From: [Benson, Amy V - APHIS](#)
To: [Baltrush, Jan J - APHIS](#); [Hadjis, Tonya - APHIS](#)
Cc: [Gibbens, Robert - APHIS](#); [Neafsey, Michael F - APHIS](#)
Subject: Complaint AC19-587 RW Commerford & Sons 1940
Date: Monday, September 23, 2019 5:20:57 PM
Attachments: [AC19-587.docm](#)
[AC19-587.pdf](#)

I included the links below – I wasn't sure if you would be able to get them through the pdf files

Video Footage:

(b) (6), (b) (7)(C)

Additional Radio/Media Coverage:

https://www.westernmassnews.com/news/animal-rights-groups-speak-out-after-beulah-asian-elephant-at/article_f551c5c6-da7a-11e9-9447-7b0c6c8d62b7.html
<https://www.spreaker.com/user/wpro/jill-alibrandi>

Sincerely,

Amy Benson
Inspection & Licensing Assistant
Program Support
USDA APHIS Animal Care
Phone: (970) 494-7478

Please send all paperwork to our new mailing address:

Fort Collins: 2150 Centre Ave., **Building B, 3W11**, Fort Collins CO, 80526

Our previous email addresses have been combined. For future communication, please use:

Email: Animalcare@usda.gov

[Join the Animal Care Stakeholder Registry and receive emails on topics of interest](#)

We are happy to announce that we have introduced an online self-service tool to assist you in determining the appropriate application to complete as required under the Animal Welfare Act (AWA).

Visit efile.aphis.usda.gov/LRAssistant to complete the 5 to 15 minute questionnaire that will recommend the specific license and/or registration types required (if any) and provides links to download those applications..

From: [Benson, Amy V - APHIS](#)
To: [Baltrush, Jan J - APHIS](#); [Hadjis, Tonya - APHIS](#)
Cc: [Gibbens, Robert - APHIS](#); [Neafsey, Michael F - APHIS](#)
Subject: Complaint AC19-592 Commerford & Sons 1940
Date: Friday, September 27, 2019 11:17:48 AM
Attachments: [AC19-592.docm](#)
[AC19-592.pdf](#)

Please see the attached files.

Sincerely,

Amy Benson
Inspection & Licensing Assistant
Program Support
USDA APHIS Animal Care
Phone: (970) 494-7478

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From: [Hadjis, Tonya - APHIS](#)
To: [Baltrush, Jan J - APHIS](#); [Gladue, Paula S - APHIS](#)
Subject: FW: Complaint AC19-587 RW Commerford & Sons 1940
Date: Wednesday, October 9, 2019 7:07:04 AM
Attachments: [AC19-587.docm](#)
[AC19-587.pdf](#)

Good morning Jan and Paula,
Do you think you can follow up on this complaint by the end of next week please?

Thanks
Tonya

From: Benson, Amy V - APHIS
Sent: Monday, September 23, 2019 5:21 PM
To: Baltrush, Jan J - APHIS <jan.p.baltrush@usda.gov>; Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Cc: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>; Neafsey, Michael F - APHIS <michael.f.neafsey@usda.gov>
Subject: Complaint AC19-587 RW Commerford & Sons 1940

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Video Footage:

(b) (6), (b) (7)(C)

Additional Radio/Media Coverage:

https://www.westernmassnews.com/news/animal-rights-groups-speak-out-after-beulah-asian-elephant-at/article_f551c5c6-da7a-11e9-9447-7b0c6c8d62b7.html
<https://www.spreaker.com/user/wpro/jill-alibrandi>

Sincerely,

Amy Benson
Inspection & Licensing Assistant
Program Support
USDA APHIS Animal Care
Phone: (970) 494-7478

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From: [Baltrush, Jan J - APHIS](#)
To: [Lupo, Keri A - APHIS](#)
Subject: Fw: Complaint AC19-587 RW Commerford & Sons 1940
Date: Monday, September 23, 2019 5:28:51 PM
Attachments: [AC19-587.docm](#)
[AC19-587.pdf](#)

*Jan Baltrush
Animal Care Inspector
586 Oronoke Rd
Waterbury, CT 06708
203-757-1765*

(b) (5), DPP

From: Benson, Amy V - APHIS <amy.v.benson@usda.gov>
Sent: Monday, September 23, 2019 5:20 PM
To: Baltrush, Jan J - APHIS <jan.p.baltrush@usda.gov>; Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Cc: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>; Neafsey, Michael F - APHIS <michael.f.neafsey@usda.gov>
Subject: Complaint AC19-587 RW Commerford & Sons 1940

I included the links below – I wasn't sure if you would be able to get them through the pdf files

Video Footage:

(b) (6), (b) (7)(C)

Additional Radio/Media Coverage:

https://www.westernmassnews.com/news/animal-rights-groups-speak-out-after-beulah-asian-elephant-at/article_f551c5c6-da7a-11e9-9447-7b0c6c8d62b7.html
<https://www.spreaker.com/user/wpro/jill-alibrandi>

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Amy Benson
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Program Support
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Phone: (970) 494-7478

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From: [Hadjis, Tonya - APHIS](#)
To: [Gladue, Paula S - APHIS](#); [Baltrush, Jan J - APHIS](#)
Subject: RE: Once finalized could we.....
Date: Friday, November 8, 2019 4:24:58 PM
Attachments: [AC19-587 Commerfords 10.19 JB signed.docm](#)

Happy Friday, November 8, 2019 I wanted you to be able to check this before I send it back up since we've had a (b)(5) Deliberative Process Privilege

(b)(5) Deliberative Process Privilege

please let me know if you've any questions on these updates.

Also, please let me know if you need me to change any of my edits.

Thanks

Tonya

From: Gladue, Paula S - APHIS
Sent: Thursday, November 7, 2019 4:08 PM
To: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>; Baltrush, Jan J - APHIS <jan.p.baltrush@usda.gov>
Subject: Once finalized could we.....

Once 19-587 finalized wording, could we please get a copy?

Thanks.

Paula S. Gladue, V.M.D.
USDA/APHIS/Animal Care
P.O. Box 117; Willimantic; CT 06226
Office (860) 423-6431

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USDA-APHIS-Animal Care



ANIMAL WELFARE COMPLAINT			
Complaint No. AC19-587	Date Entered: 23-Sep-19	Processed By: AVB	
Referred To: Baltrush / Hadjis		Reply Due: 25-Oct-19	
Facility or Person Complaint Filed Against			
Name: R W Commerford & Sons Inc		Customer No.: 1940	License No.: 16-C-0006
Address: PO Box 188		Email Address: darlenecommerford@msn.com	
City: Goshen	State: CT	Phone No.: (860) 491-3421	
Complainant Information			
Name: Jill Alibrandi / Anonymous		Organization:	
Address:		Email Address: jalibran@us.ibm.com	
City:	State:	Phone No.: (203) 216-2393	
How was the Complaint received? Email			
Details of Complaint: SEE ATTACHED			
Results: *Complainant was concerned that Beulah is sick and maltreated – Based on the review of medical records and according to attending veterinarian and licensee statements, USDA was not able to determine that there was evidence that Beulah was showing any signs of illness or that she was maltreated. According to the Attending Veterinarian, Beulah was in good condition prior to travel to the Big E. *Complainant was concerned that Beulah was lying down – Photograph provided by complainant showed Beulah lying down on a slightly inclined grassy area. Beulah's handler is also seen in the photo right near her head. Licensee stated, lying down on grass as seen in that photo was not an unusual behavior for Beulah. *Complainant was concerned that she was thin for an elephant – According to the attending veterinarian she was in good body condition and she was not thin. *Complainant was concerned that there was no food or water present – Licensee stated that Beulah had access to fresh hay throughout the day and was provided grain twice a day. Licensee stated that tresh water was provided to the elephant via a hose. When Beulah was thirsty she would pick up the hose and the Licensee or handler would turn the water on and she had unlimited access to the water until she dropped the hose.			



USDA-APHIS-Animal Care



*Complainant was concerned that there was urine soaked hay in the pen –

In the photos there is hay present. However, it cannot be determined from the photos if the hay was urine soaked or not. Licensee stated that Beulah was provided with fresh hay throughout the day and there was no need for her to eat hay that was contaminated by urine.

*Complainant was concerned that Beulah was drooling from the mouth –

According to the licensee and the attending veterinarian, Beulah did drool on occasion but there was no medical condition to cause the drooling.

*Complainant was concerned that she collapsed 3 times and they forced her back up –

According to the licensee on the day she died, Beulah went down twice, within a minute to a minute and a half. The second time she went down she did not get back up. The licensee states that he did not force her to get back up either time she went down, nor was any type of equipment available or used to force her to get back up.

*Complainant was concerned that she was covered up and taken out with a bucket truck –

Licensee confirmed that yes, Beulah was covered up after her death. This incident happened in the morning, just as the fair was opening. Licensee recounted that steps were taken to place visual and physical barriers around the trailers and the area where Beulah was located (including the use of a tarp to cover her), and the public area of the fairground. Once the fairgrounds were closed for the day, equipment was used to place slings to support, then carefully lift and place her body onto a truck.

*Complainant was concerned that Karen had died in March 2019 and it was not reported –

Licensee had informed USDA several months prior to March 2019 that Karen was under the care of the Attending Veterinarian for a medical condition, which was confirmed by USDA by review of medical records. Licensee also contacted USDA on the same day that Karen died to report that she had passed.

*Complainant is concerned that Minnie is in clear danger –

USDA inspectors have recently seen Minnie, and she was not showing any abnormal behaviors and looked in good condition. According to the Licensee she is acting normally and is eating very well.

*Complainant was concerned that the elephants are experiencing physical and psychological harm from the use of the bullhook –

The inspectors did not observe any evidence that physical or psychological harm had been done to Minnie at the time of inspection.

*Complainant was concerned that the elephant is being housed in unsuitable and unsanitary conditions. They are in a windowless indoor space and on concrete floors –

The complainant did not identify a specific location or venue for this allegation. The following pertains to the elephant housing facility at the home site. USDA confirmed that the elephant pen inside the barn at the home site was clean and sanitary at the time of the inspection. Licensee stated that the pen is cleaned two or more times throughout the day. There are windows in the walls of the elephant pen in the barn as well as windows in the large door to the barn. The floor of the elephant pen is concrete equipped with temperature-controlled radiant heating. Licensee stated that the elephant is provided access to an outdoor enclosure containing natural vegetation on a daily basis; access and length of time in the outdoor enclosure is dependent on the weather conditions.

From: [Baltrush, Jan J - APHIS](#)
To: [Hadjis, Tonya - APHIS](#); [Gladue, Paula S - APHIS](#)
Subject: Re: Once finalized could we.....
Date: Friday, November 8, 2019 4:54:16 PM
Attachments: [AC19-587 Commerfords 10.19 JB signed.docm](#)

Hi Ladies,

I found 2 typos... They are in (AND CAPS).

Looks good otherwise.

Jan

*Jan Baltrush
Animal Care Inspector
586 Oronoke Rd
Waterbury, CT 06708
203-757-1765*

(b) (5), DPP

From: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Sent: Friday, November 8, 2019 4:22 PM
To: Gladue, Paula S - APHIS <paula.s.gladue@usda.gov>; Baltrush, Jan J - APHIS <jan.p.baltrush@usda.gov>
Subject: RE: Once finalized could we.....

Happy Friday, November 8, 2019 I wanted you to be able to check this before I send it back up since we've had a

(b)(5) Deliberative Process Privilege

(b)(5) Deliberative Process Privilege

Please let me know if you've any questions on these updates.

Also, please let me know if you need me to change any of my edits.

Thanks

Tonya

From: Gladue, Paula S - APHIS
Sent: Thursday, November 7, 2019 4:08 PM
To: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>; Baltrush, Jan J - APHIS <jan.p.baltrush@usda.gov>
Subject: Once finalized could we.....

Once 19-587 finalized wording, could we please get a copy?

Thanks.

Paula S. Gladue, V.M.D.
USDA/APHIS/Animal Care
P.O. Box 117; Willimantic, CT 06226
Office (860) 423-6431

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USDA-APHIS-Animal Care



ANIMAL WELFARE COMPLAINT			
Complaint No. AC19-587	Date Entered: 23-Sep-19	Processed By: AVB	
Referred To: Baltrush / Hadjis		Reply Due: 25-Oct-19	
Facility or Person Complaint Filed Against			
Name: R W Commerford & Sons Inc		Customer No.: 1940	License No.: 16-C-0006
Address: PO Box 188		Email Address: darlenecommerford@msn.com	
City: Goshen	State: CT	Phone No.: (860) 491-3421	
Complainant Information			
Name: Jill Alibrandi / Anonymous		Organization:	
Address:		Email Address: jalibran@us.ibm.com	
City:	State:	Phone No.: (203) 216-2393	
How was the Complaint received? Email			
Details of Complaint: SEE ATTACHED			
Results: <p>*Complainant was concerned that Beulah is sick and maltreated – Based on the review of medical records and according to attending veterinarian and licensee statements, USDA was not able to determine that there was evidence that Beulah was showing any signs of illness or that she was maltreated. According to the Attending Veterinarian, Beulah was in good condition prior to travel to the Big E.</p> <p>*Complainant was concerned that Beulah was lying down – Photograph provided by complainant showed Beulah lying down on a slightly inclined grassy area. Beulah's handler is also seen in the photo right near her head. Licensee stated, lying down on grass as seen in that photo was not an unusual behavior for Beulah.</p> <p>*Complainant was concerned that she was thin for an elephant – According to the attending veterinarian she was in good body condition and she was not thin.</p> <p>*Complainant was concerned that there was no food or water present – Licensee stated that Beulah had access to fresh hay throughout the day and was provided grain twice a day. Licensee stated that (FRESH) tresh water was provided to the elephant via a hose. When Beulah was thirsty she would pick up the hose and the Licensee or handler would turn the water on and she had unlimited access to the water until she dropped the hose.</p>			



USDA-APHIS-Animal Care



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The inspectors did not observe any evidence that physical or psychological harm had been done to Minnie at the (TIME OF) time of inspection.

*Complainant was concerned that the elephant is being housed in unsuitable and unsanitary conditions. They are in a windowless indoor space and on concrete floors –

The complainant did not identify a specific location or venue for this allegation. The following pertains to the elephant housing facility at the home site. USDA confirmed that the elephant pen inside the barn at the home site was clean and sanitary at the time of the inspection. Licensee stated that the pen is cleaned two or more times throughout the day. There are windows in the walls of the elephant pen in the barn as well as windows in the large door to the barn. The floor of the elephant pen is concrete equipped with temperature-controlled radiant heating. Licensee stated that the elephant is provided access to an outdoor enclosure containing natural vegetation on a daily basis; access and length of time in the outdoor enclosure is dependent on the weather conditions.

From: [Baltrush, Jan J - APHIS](#)
To: [McKinnie, Carolyn - APHIS](#); [Gladue, Paula S - APHIS](#)
Cc: [Hadjis, Tonya - APHIS](#)
Subject: Re: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20
Date: Thursday, December 19, 2019 3:17:01 PM
Attachments: [Commerfords Memo to Sen Blumenthal.docx](#)

Hi Everyone,

Here is what I put together.

Jan

Jan Baltrush
Animal Care Inspector
586 Oronoke Rd
Waterbury, CT 06708
203-757-1765
(b) (5), DPP

From: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>
Sent: Thursday, December 19, 2019 3:04 PM
To: Baltrush, Jan J - APHIS <jan.p.baltrush@usda.gov>; Gladue, Paula S - APHIS <paula.s.gladue@usda.gov>
Cc: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Subject: Fwd: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

I don't know how I missed Bobs jump start- but I did. Helpful hints/start below...

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From: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>
Sent: Thursday, December 19, 2019 10:17:47 AM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>; Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>
Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>
Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Great -- here's a start. Thanks.

1. What were the initial and final causes of death for elephants Karen and Beulah?
2. Could those deaths have been prevented? (b) (5), DPP
[REDACTED]
3. What is USDA's role after unexpected exotic animal deaths?
[REDACTED]
4. How does USDA ensure that the veterinarian performing the necropsy is qualified and renders an independent opinion?
5. Why did Commerford Zoo continue to pass USDA inspections wider AWA despite the premature deaths of two elephants?

From: McKinnie, Carolyn - APHIS

Sent: Thursday, December 19, 2019 11:14 AM

To: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>; Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>

Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>

Subject: Re: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Hi Bob, I will work with the inspectors on this today. As an FYI (b) (6), (b) (7)(C) [REDACTED]. I am familiar with this as I worked closely with Hadjis on the 2 elephant complaint responses.
Carolyn

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From: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>

Sent: Thursday, December 19, 2019 10:04:35 AM

To: Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>

Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>; McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>

Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Never mind about my suggested deadline, just saw we need to forward by 12/20.

From: Gibbens, Robert - APHIS

Sent: Thursday, December 19, 2019 10:58 AM

To: Betty J - APHIS Goldentyer (betty.j.goldentyer@usda.gov) <betty.j.goldentyer@usda.gov>

Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>; Carolyn - APHIS McKinnie (carolyn.j.mckinnie@usda.gov) <carolyn.j.mckinnie@usda.gov>

Subject: FW: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Yes, we'll get answers to the questions from Hadjis/inspector. Do we need 10 years of inspections or 3? The deadline in the letter is January 18; if we get it to Mandi by January 7, would that be okay?

Thanks.

From: Goldentyer, Betty J - APHIS

Sent: Thursday, December 19, 2019 10:40 AM

To: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>

Subject: Fwd: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Bob

Can you get with Katie and start on this. Probably need the inspectors to answer the questions.

Thanks

Get [Outlook for iOS](#)

From: Frederick, Mandi M - APHIS <mandi.m.frederick@usda.gov>

Sent: Thursday, December 19, 2019 12:04 PM

To: Dunigan, Anne H - APHIS; Needham, Christopher M - APHIS; McNally, Andrea C - APHIS

Cc: Goldberg, Ruth - APHIS; Taylor, Kimberly A - APHIS; Goldentyer, Betty J - APHIS; Anderson, Christa - APHIS

Subject: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Hi all,

I'm attaching a letter that LPA just received from Senator Blumenthal's office about Commerford Zoo in Connecticut. As you'll see, the Senator is concerned about the welfare of animals at the zoo particularly in light of the deaths of 2 elephants. He's asked 5 specific

questions and asked for 9 years worth of inspection reports. The Secretary will be signing the response. Could you please read over this letter and provide guidance on how to best respond?

Chris—I'm not sure if we need to answer each of his questions in turn. If it was an oversight letter, I'm sure we would but in this case, do we need to? And if we do need to answer each question—Anne, can AC please provide the input?

RE: Inspection reports—Andrea, can we give these out or would we need to ask the Senator to file a FOIA for them?

Since Secretary Perdue is signing this letter, we need to move it rather quickly so if you could **please get me your input by tomorrow at noon**, that would be great. I should also note that I'm looping in others in LPA b/c I will be on leave next week so someone else is likely to draft or take over this response.

Thank you!

Mandi M. Frederick
Writer/Editor--Executive Communications
Legislative and Public Affairs
APHIS-USDA
4700 River Rd., Unit 49
Riverdale, MD 20737
2A02.30
(301) 851-4095

From: [Tm72491](#)
To: [Baltrush, Jan J - APHS](#)
Subject: commerford beulah
Date: Monday, September 23, 2019 1:56:38 PM
Attachments: [ct environmental protection letter 2019.doc](#)

Hi Jan,

This is what I sent to the Connecticut Environmental Protection Department along with the latest inspection report.

Thanks,
Tim

September 23, 2019

R.W. Commerford & Sons, Inc is a family owned and operated business for 55 years. Senior animal handlers William Commerford over 50yrs of animal husbandry, Darlene Commerford over 50 yrs of animal husbandry, Tim Commerford 37 yrs of animal husbandry, Margaret Commerford 30 yrs of animal husbandry, and Gerard Deziel 30 yrs of animal husbandry. The group of animal handlers mentioned above also do daily feeding, health care, cleaning, and maintenance of all the animals on our farm. Also, the same handlers maintains the facility.

Our facility meets all building codes and USDA requirements and guide lines. Included will be our last inspection report from the USDA. If you have any questions regarding our facility you make contact Jan Baltrush (Aphis animal care inspector) of the USDA.

Information on Beulah: Beulahs birth to the best of our knowledge is 1967 from Myanmar. Beulah was acquired April 23, 1973 by Robert Commerford. She came into the United States through the Southwick Game Farm in Mendon, MA. She has lived with us for the past 46 yrs. Beulah died September 15, 2019 a necropsy was performed and manner of death was a heart attack. All information above can also be requested from Jan Baltrush.

R.W. Commerford & Sons, Inc is in good standing with the State of Connecticut, local authorities, Connecticut Fish & Wildlife, Connecticut Department of Agriculture, Connecticut Department of Public Health, United States Department of Agriculture, and in any state that we do business in.

Thank You,

Tim Commerford

From: [Gibbens, Robert - APHIS](#)
To: [Hadjis, Tonya - APHIS](#)
Cc: [Neafsey, Michael F - APHIS](#)
Subject: Fwd: Complaint AC19-587 RW Commerford & Sons 1940
Date: Wednesday, September 25, 2019 9:20:32 AM
Attachments: [AC19-587.docm](#)
[AC19-587.pdf](#)

Tonya - is the a new complaint?

Get [Outlook for iOS](#)

From: Benson, Amy V - APHIS <amy.v.benson@usda.gov>
Sent: Monday, September 23, 2019 2:20:47 PM
To: Baltrush, Jan J - APHIS <jan.p.baltrush@usda.gov>; Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Cc: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>; Neafsey, Michael F - APHIS <michael.f.neafsey@usda.gov>
Subject: Complaint AC19-587 RW Commerford & Sons 1940

I included the links below – I wasn't sure if you would be able to get them through the pdf files

Video Footage:

(b) (6), (b) (7)(C)

Additional Radio/Media Coverage:

https://www.westernmassnews.com/news/animal-rights-groups-speak-out-after-beulah-asian-elephant-at/article_f551c5c6-da7a-11e9-9447-7b0c6c8d62b7.html
<https://www.spreaker.com/user/wpro/jill-alibrandi>

Sincerely,

Amy Benson
Inspection & Licensing Assistant
Program Support
USDA APHIS Animal Care
Phone: (970) 494-7478

Please send all paperwork to our new mailing address:

Fort Collins: 2150 Centre Ave., **Building B, 3W11**, Fort Collins CO, 80526

Our previous email addresses have been combined. For future communication, please use:

Email: Animalcare@usda.gov

[Join the Animal Care Stakeholder Registry and receive emails on topics of interest](#)

We are happy to announce that we have introduced an online self-service tool to assist you in determining the appropriate application to complete as required under the Animal Welfare Act (AWA):

Visit efile.aphis.usda.gov/LRAssistant to complete the 5 to 15 minute questionnaire that will recommend the specific license and/or registration types required (if any) and provides links to download those applications.

From: [Hadjis, Tonya - APHIS](#)
To: [Bell, Richard A - APHIS](#)
Cc: [Neafsey, Michael F - APHIS](#)
Subject: RE: Beulah the elephant CID 1940
Date: Thursday, September 19, 2019 10:47:10 AM
Attachments: [AC19-214.docm](#)

Good morning Andre,

Congressman David Michel david.michel@cga.ct.gov, 914-843-7545, is inquiring about Beulah and Karen. He is a CT State Congressman and co-chair of the legislative animal advocacy caucus. He is planning to hold a public hearing at the Capitol in Oct about this and would like USDA to comment to him. He says that we have not given him information on items from prior -the kangaroo complaint response enclosed and the link to the news article below

<https://www.registercitizen.com/news/article/Petition-calls-for-sending-CT-farm-s-kangaroo-13751057.php>

In addition to the kangaroo, he would like information on, as I wrote above, Beulah and Karen. I told him that you are more equipped to help him to navigate how to get the information, being inquiries from a legislative office.

Please let me know if you've any questions.

Thanks

Tonya

From: Bell, Richard A - APHIS
Sent: Monday, September 16, 2019 10:23 AM
To: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Subject: RE: Beulah the elephant CID 1940

Thanks, Tonya.

From: Hadjis, Tonya - APHIS
Sent: Monday, September 16, 2019 10:19 AM
To: Bell, Richard A - APHIS <richard.a.bell@usda.gov>
Subject: RE: Beulah the elephant CID 1940

TRA means on travel status, specifically overnight and requiring an itinerary submission. Licensees who take animals on TRA have an additional site named "TRA" in our database.

The Big E is the Eastern States Exposition, link below. It's a state fair for New England, very large and popular and runs for a couple of weeks, annually, this time of year.

New info – but unconfirmed – the AV told inspector they're considering conducting a necropsy. I think to do so, they will take remains to a different location than home site as they will need special equipment. The long and short of it being, we don't know exactly where the remains are destined at this point.

Please let me know if you've any other questions.

<https://www.thebige.com/>

From: Bell, Richard A - APHIS
Sent: Monday, September 16, 2019 10:14 AM
To: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Subject: RE: Beulah the elephant CID 1940

Hi Tonya-

Thanks for this. The first sentence is little unclear. What is the tra? And what is the Big E?

From: Hadjis, Tonya - APHIS
Sent: Monday, September 16, 2019 10:05 AM
To: Bell, Richard A - APHIS <richard.a.bell@usda.gov>
Subject: Beulah the elephant CID 1940

Good morning Andre,
Licensee called and reported to inspector that Beulah, approx. 55 yr old, Asian elephant, died, either overnight or the morning of Sunday Sept 15 while on tra at the Big E in Springfield MA. They have notified their AV as well as the veterinarian on Big E premises. No cause of death has been verified and I've not been informed of a speculative cause of death. Licensee has kept this event out of the public eye and plan to remove her remains tonight, after close for burial at the home site in CT.

Please let me know if you've any questions. AWO has also been informed of this event.

Thanks

Tonya



USDA-APHIS-Animal Care



ANIMAL WELFARE COMPLAINT			
Complaint No. AC19-214	Date Entered: 18-Apr-19	Processed By: SPR	
Referred To: Hadjis/Baltrush		Reply Due: 20-May-19	
Facility or Person Complaint Filed Against			
Name: RW Commerford & Sons Inc		Customer No.: 1940	License No.: 16-C-0006
Address: PO Box 188 Route 4		Email Address:	
City: Goshen	State: CT	Phone No.: (860)491-3421	
Complainant Information			
Name: David Michel		Organization:	
Address:		Email Address: david.michel@cga.ct.gov	
City:	State:	Phone No.:	
How was the Complaint received? Email			
Details of Complaint: SEE ATTACHED			
Results: This complaint is in regards to a video showing a kangaroo in a pen. This specific kangaroo has recently been sold and was not on the premise when I conducted this inspection. The complainant was concerned that the kangaroo was confined to a small space, may have been drugged so that it would not jump over the fence, and was pacing: The Kangaroo exhibit at this petting zoo is approximately 10' x 12'. The AWA requires that the animal enclosures shall be constructed to provide sufficient space to allow each animal to make normal postural and social adjustments. This enclosure does meet the AWA requirements. The animal in the video appears to be in good condition. It was unclear as to the time of day that this video was taken. If the staff was making rounds with their schedule feeding that may explain the pacing. However, I have seen this animal on several occasions and he is usually relaxed and lying down in this enclosure. There is no evidence that this animal has been given drugs to keep him from jumping over the fence. The Complainant was concerned that the animal is exposed to the extreme weather conditions: If it is cold the sides of the tent are lowered, heat lamps are added to each pen and if it is very cold they are brought into the insulated trailers and heat lamps are added to each pen. If the weather is too hot they will run large fans. The Complainant is concerned that when they were at the 3 County Fair it was very hot and they were housed and transported in metal trailers: They have not been to the 3 County Fair in			



USDA-APHIS-Animal Care



approximately 6 yrs. They are transported in insulated trailers. Most trips between fairs are within 1-4 hrs. There are a few that are longer. But again they are transported in insulated trailers. Windows and vents are open as needed. Once they get to a site they unload all the animals into pens, under the large tent and fans are running if needed.

Application Kit Provided:

Yes: ☐

No: ☒

Inspector:

Jan Baltrush

Date:

3-May-19

Reviewed By:

Tonya Hadjis

Date:

9-May-19

From: [Hadjis, Tonya - APHIS](#)
To: [McKinnie, Carolyn - APHIS](#)
Subject: AC19-587
Date: Thursday, November 7, 2019 9:41:00 AM
Attachments: [AC19-587.pdf](#)
[AC19-587 Commerfords 10.19.pdf](#)

Carolyn,

Enclosed is the updated (dated 7-Nov-19) complaint response. Please let me know if you've any questions.

Thanks

Tonya

From: Hadjis, Tonya - APHIS
Sent: Wednesday, November 6, 2019 11:51 AM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>
Subject: AC19-587

Carolyn,

Enclosed is the original complaint and the response, please review. On the original complaint document, please scroll all of the way down as there is another complaint that was rolled into Ac19-587.

In addition, expect another, smaller complaint that we will send the response up later as well. One inspector is on sick leave today, so there is some delay due to that.

Thanks

Tonya

Tonya Hadjis, DVM
Supervisory Animal Care Specialist
USDA/APHIS/Animal Care
781-999-1587

From: [Hadjis, Tonya - APHIS](#)
To: [McKinnie, Carolyn - APHIS](#)
Subject: AC19-587
Date: Wednesday, November 6, 2019 11:50:00 AM
Attachments: [AC19-587 Commerfords 10.19.pdf](#)
[AC19-587.pdf](#)

Carolyn,

Enclosed is the original complaint and the response, please review. On the original complaint document, please scroll all of the way down as there is another complaint that was rolled into Ac19-587.

In addition, expect another, smaller complaint that we will send the response up later as well. One inspector is on sick leave today, so there is some delay due to that.

Thanks

Tonya

Tonya Hadjis, DVM

Supervisory Animal Care Specialist
USDA/APHIS/Animal Care
781-999-1587

From: [Hadjis, Tonya - APHIS](#)
To: [Gladue, Paula S - APHIS](#); [Baltrush, Jan J - APHIS](#)
Subject: AC19-587
Date: Thursday, November 7, 2019 8:49:00 PM
Attachments: [AC19-587 Commerfords 10.19 JB signed.docm](#)

Here is the complaint that I sent up. Once I have the other, I will send that up.

Tonya Hadjis, DVM
Supervisory Animal Care Specialist
USDA/APHIS/Animal Care
781-999-1587



USDA-APHIS-Animal Care



Jan Baltrush	4-Nov-19
Reviewed By:	Date:

From: [Hadjis, Tonya - APHIS](#)
To: [McKinnie, Carolyn - APHIS](#)
Subject: Ac19-587
Date: Thursday, November 7, 2019 8:51:00 PM
Attachments: [AC19-587 Commerfords 10.19 JB signed.docm](#)

Carolyn,

It occurred to me that I sent you a complaint that I signed as reviewer, when you should have signed as reviewer. This is the same complaint, just an earlier version as I signed after Jan.

Tonya

From: [Gladue, Paula S - APHIS](#)
To: [Hadjis, Tonya - APHIS](#)
Subject: Ele scientific articles plus 2016 complaint/response
Date: Friday, October 4, 2019 10:15:18 AM
Attachments: [AC16-549 final 8-15-16.pdf](#)
[FW Emergency Complaint re possible injured elephant in Binghampton, New York.pdf](#)
[GnRH Vaccine \(Boedeker-Brown\) 2012.pdf](#)
[GnRH vaccine in elephants.pdf](#)

The previous complaint was AC16-549 that contained allegation regarding vaginal bleeding. Here is the complaint & complaint response (Ashley was acting SACS then.....didn't get a copy of the signed response).

Also attached 2 scientific articles about the use of GnRH vaccine as a potential preventative for uterine pathology in nulliparous female eles as FYI.

I haven't had a chance yet to see if I still have any inspection notes with specifics from conversations with Tim and Issac. That may not be til next week.

Hope samples of uterus, heart, clot, fluids also taken....not specifically mentioned.

Paula S. Gladue, V.M.D.
USDA/APHIS/Animal Care
P.O. Box 117; Willimantic; CT 06226
Office (860) 423-6431

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**ANIMAL WELFARE COMPLAINT**

Complaint No. AC16-549	Date Entered 29 July 2016	Received By A Benson
Referred To Gladue/McIntosh	Reply Due 30 August 2016	

Facility or Person Complaint Filed Against

Name R W Commerford & Sons Inc		Customer/License/Registration No. 1940 / 16-C-0006	
Address PO Box 188, Rt. 4			
City Litchfield	State CT	Zip 06756	Phone No (860) 491-3421

Complainant

Name (b) (6), (b) (7)(C)		Organization CompassionWorks International	
Address			
City	State	Zip	Phone No./Email address (b) (6), (b) (7)(C) / (b) (6), (b) (7)(C) .org

How was complaint received? email

Forward response to FOIA: Yes ☐ No ☐**Details of Complaint: See attached.**

Results: The correspondence sent in by the complainant contained 3 specific allegations against Commerfords 16-C-0006 CID #1940. The allegations included in the complainant's correspondence were: (1) Elephant named "Beulah" was "peeing blood" the evening of 7/27/16 when on exhibit at the Broome County Fair in Binghamton, NY; (2) an electric prod was used on the elephant whenever she approached the fence; and (3) failure of handlers to respond.

I went to the home site of the licensee on 8/10/16 to address the complaint and met with the licensee. The 3 elephants were on the premises. Discussion of the allegations follows.

Allegation #1: The licensee stated that the Asian elephant named "Beulah" was at the Broome County Fair in NY and did pass a red-colored material from her body on that date. The elephant handler who was on-site at the NY fair contacted the licensee by phone to report it when he noticed the discharge. The licensee explained and I confirmed by phone with the Attending

Veterinarian (AV) that several years ago "Beulah" was diagnosed with a medical condition that includes the infrequent passage of a dark red to purple in color mucoid, stringy material from her vulva as one of the clinical signs. The AV has observed the discharge, assessed the elephant, performed diagnostic testing, has given the licensee recommendations to follow, and continues to monitor the elephant for changes. The elephant has not exhibited any discomfort or physical problems from this medical condition. In addition the licensee contacted the AV by phone to report the episode of discharge after it happened. The APHIS inspector saw the call log entry on the licensee's phone and also confirmed the call with the AV.

Allegation #2: The APHIS inspector did not conduct the inspection at the NY fairgrounds so did not see the equipment that the licensee brought to the fair. However the licensee stated that although they do use electric wire as part of the enclosure, they do not use an electric prod on the elephants.

Allegation #3: The licensee stated that the elephant handler did contact him/her by phone after he noticed the discharge, and the licensee did contact the AV to report the discharge. The APHIS inspector saw the call log entries on the licensee's phone.

Application packet provided? Yes ☐ No ☒

INSPECTOR

Paula S. Gladue, V.M.D.; #1054

DATE

15-Aug-16

REVIEWED BY

DATE

From: [Goldentyer, Betty J - APHIS](#)
To: [Nowakowski, Craig A - APHIS](#); [Sofranko, Denise M - APHIS](#); [McIntosh, Ashley C - APHIS](#); [Gladue, Paula S - APHIS](#)
Cc: [Stokes, William S - APHIS](#)
Subject: FW: Emergency Complaint re: possible injured elephant in Binghamton, New York
Date: Thursday, July 28, 2016 3:50:37 PM

Craig,

Would you log this as a complaint?

Denise, let us know how you want to handle.

Ashley, Paula I believe has experience with these elephants and can help walk you through getting this complaint completed.

Thanks

Betty

From: (b) (6), (b) (7)(C) [REDACTED]@cwint.org]
Sent: Thursday, July 28, 2016 3:18 PM
To: betty.j.goldentyer@usda.gov
Cc: ACEAST <ACEAST@aphis.usda.gov>
Subject: Emergency Complaint re: possible injured elephant in Binghamton, New York

Dear Dr. Goldentyer,

My organization was contacted today regarding an elephant on display at the Broome County Fair currently running in Binghamton, NY.

Several eyewitnesses report that last night at approximately 7:30pm the elephant on display (who we believe to be Beulah with Commerford & Sons) was found peeing blood.

When it began to pee blood the crowd on hand became distressed and attempted to alert the handlers who ignored their concerns. One handler is reported to have been behaving erratically.

The individual who reported this incident was with his family, and he pulled his children from the scene due to his children becoming distressed by the sight of the blood, as well as by the fact that an electric prod was being visibly used on the elephant whenever it neared its fence.

We request an emergency veterinary check into this situation to ascertain why this elephant may have been peeing blood, as well as a welfare check related to the inappropriate use of injurious weapons on the animal.

Local authorities and the humane society have refused to intervene. Please advise on what further action we can take to ensure the health and safety of this animal (I have attached a photo of the elephant in question in its enclosure for identification purposes.)

Thank you for your attention to this matter.

Kind regard,

(b) (6),
(b) (7)

(b) (6), (b) (7)(C)

CompassionWorks International
805.708.3121



Please support our life-saving work.
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EFFECTS OF A GONADOTROPIN-RELEASING HORMONE VACCINE ON OVARIAN CYCLICITY AND UTERINE MORPHOLOGY OF AN ASIAN ELEPHANT (*ELEPHAS MAXIMUS*)

Author(s): Nancy C. Boedeker, D.V.M., Lee-Ann C. Hayek, Ph.D., Suzan Murray, D.V.M, Dipl. A.C.Z.M., David M. de Avila, and Janine L. Brown, Ph.D.

Source: Journal of Zoo and Wildlife Medicine, 43(3):603-614, 2012.

Published By: American Association of Zoo Veterinarians

DOI: <http://dx.doi.org/10.1638/2011-0270.1>

URL: <http://www.bioone.org/doi/full/10.1638/2011-0270.1>

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EFFECTS OF A GONADOTROPIN-RELEASING HORMONE VACCINE ON OVARIAN CYCLICITY AND UTERINE MORPHOLOGY OF AN ASIAN ELEPHANT (*ELEPHAS MAXIMUS*)

Nancy C. Boedeker, D.V.M., Lee-Ann C. Hayek, Ph.D., Suzan Murray, D.V.M, Dipl. A.C.Z.M., David M. de Avila, and Janine L. Brown, Ph.D.

Abstract: This report describes the successful use of a gonadotropin releasing hormone (GnRH) vaccine to suppress ovarian steroidogenic activity and to treat hemorrhage and anemia associated with reproductive tract pathology in a 59 year old Asian elephant (*Elephas maximus*). The Repro BLOC® GnRH vaccine was administered subcutaneously as a series of 4 boosters of increasing dose from 3 to 30 mg of recombinant ovalbumin GnRH fusion protein given at variable intervals after initial vaccination with 3 mg protein. Efficacy was confirmed over a year after initial vaccination based on complete ovarian cycle suppression determined by serum progestagen analyses. Estrous cycle suppression was associated with a significant increase in GnRH antibody binding and subsequent decrease in serum luteinizing hormone and follicle stimulating hormone concentrations. Ultrasonographic examinations of the reproductive tract documented a reduction in uterine size and vascularity after immunization. The hematocrit level normalized soon after the initial intrauterine hemorrhage, and no recurrence of anemia has been detected. No substantive adverse effects were associated with GnRH vaccination. The results indicate that GnRH vaccination in elephants shows potential for contraception and management of uterine pathology in older elephants.

Key words: Contraception, elephant, *Elephas maximus*, gonadotropin releasing, progestagen, vaccine.

INTRODUCTION

Ovarian function in elephants is similar to that in other mammals and is controlled by secretion of the pituitary gonadotropins, follicle-stimulating hormone (FSH) and luteinizing hormone (LH), presumably under the influence of hypothalamic gonadotropin-releasing hormone (GnRH).^{4,5} In general, FSH is responsible for stimulating ovarian follicular growth and development and for the production of estrogens, whereas LH induces ovulation, formation of the corpus luteum, and production of progestagens.^{6,25} Elephants are unique in having the longest documented mammalian estrous cycle, of 13–17 wk, and exhibiting two successive waves of follicular development

that culminate in two distinct LH surges, with only the second inducing ovulation.^{8,9,35}

One documented problem of older female elephants and other long-lived species in captivity is termed asymmetric reproductive aging.^{24,28} In the wild, most adult female elephants are either pregnant or lactating; they experience comparatively few reproductive cycles in their lifetime. In captive Asian elephants, primarily nulliparous females over 30 yr of age or those that have not calved within a 10- to 15-yr period, numerous reproductive tract pathologies develop.^{24,27,29,44} For example, older Asian elephants often develop endometrial hyperplasia and/or multiple leiomyomata (benign myometrial tumors).^{1,27,29,44,45,57} Periodic mucohemorrhagic vaginal discharge can result from these pathologic alterations. These specific conditions have not been reported in wild Asian elephants. Because older cycling cows appear to be particularly susceptible, it has been speculated that continuous steroid hormone (estrogens and/or progestagens) exposure associated with ovarian cyclicity of nonbred females has a negative and cumulative effect on reproductive health and urogenital tract integrity.^{1,24,28} To prevent these pathologies from developing, treatments to shut down ovarian activity should be considered if a female is not intended for breeding.

GnRH vaccines have been designed to stimulate the production of anti-GnRH antibodies that

From the National Zoological Park, Smithsonian Conservation Biology Institute, 3001 Connecticut Avenue NW, Washington D.C. 20008, USA (Boedeker, Murray); Mathematics and Statistics, Smithsonian Institution, P.O. Box 37012, National Museum of Natural History, MRC 121, Washington D.C. 20013, USA (Hayek); Department of Animal Sciences, Washington State University, Pullman, WA 99164, USA (de Avila); and the National Zoological Park, Smithsonian Conservation Biology Institute, 1500 Remount Road, Front Royal, VA 22630 USA (Brown). Correspondence should be directed to Dr. Boedeker (boedekern@si.edu).

The author(s) prepared this manuscript as part of their official duties with the U.S. government and are unable to assign copyright to the AAZV.

block binding of endogenous GnRH to gonadotropin receptors in the pituitary gland. This action inhibits the release of FSH and LH from the anterior pituitary, thereby causing the cessation of ovarian steroidogenic activity and reproductive cyclicity. Immunization against GnRH has been used successfully to suppress ovarian function in a number of domestic, laboratory, wildlife, and livestock species.^{3,10,18,22,23,30,31,36,42,49,55} The primary structure of the decapeptide GnRH is largely conserved in mammals, but by itself is not immunogenic.^{23,46} The vaccine in this study was developed by using a recombinant ovalbumin-GnRH fusion protein, marketed under the trade name Repro-BLOC® (Amplicon Vaccine, LLC, Pullman, Washington 99163, USA).^{11,20,33,51,56} The adjuvant is a combination of Freund's incomplete adjuvant with a synthetic cytosine guanine oligodeoxynucleotide that mimics the immunostimulatory effects of bacterial deoxyribonucleic acid because of its relatively high content of unmethylated cytosine guanine dinucleotides.^{10,11}

This case report describes the use of Repro-BLOC to suppress ovarian cyclicity to prevent hemorrhage and anemia associated with reproductive tract pathologies in an older female Asian elephant at the National Zoological Park. To date, to the authors' knowledge, there are no published reports on the use of GnRH vaccination to control reproductive activity in female elephants. Possible benefits of using this approach to address problems associated with asymmetric reproductive aging as well as for contraception in elephants are discussed.

CASE REPORT

The subject was a 59-yr-old, approximately 3,300 kg, female Asian elephant who had been at the Smithsonian Institution's National Zoological Park for 46 yr. She was housed with a 33-yr-old female Asian elephant and occasionally that female's 6-yr-old male offspring. This female had a relatively unremarkable medical history, with the exception of chronic dental malposition and a small chronic left elbow abscess. At the time of presentation, she was on long-term, low-dose ibuprofen (3,600 mg p.o. s.i.d.) for management of possible discomfort associated with mastication, and a glucosamine and chondroitin supplement (Cosequin® Equine Concentrated Powder, Nutramax Laboratories, Edgewood, Maryland, 21040 USA) intended for maintenance of joint health.

On 14 January 2007, keepers reported that the elephant had a decreased appetite and stool production, mild lethargy, and reluctance to train,

particularly for behaviors that involved lying down. A complete blood cell count (CBC) and chemistry panel were unremarkable other than a hematocrit concentration of 30.8% and hemoglobin level of 10.1 g/dl, both at the low end of her historic range (hematocrit concentration, 30–43.7%, average 36%; hemoglobin level, 10.1–14.9 g/dl, average 12.02 g/dl), and an elevated fibrinogen level of 900 mg/dl (range, 200–700 mg/dl; average, 479 mg/dl). Urinalysis, fecal parasite check, fecal cytology, and fecal occult blood were unremarkable. Mild colic of unknown etiology was initially suspected, and clinical signs were rapidly responsive to a 2-day course of treatment with injectable flunixin meglumine (Banamine® 50 mg/ml, Merck Intervet/Schering Plough Animal Health, Summit, New Jersey 07901, USA; 1,000–3,000 mg i.m. s.i.d.). The hematocrit concentration remained relatively stable, at 30.1% on 16 January, and 31.9% on 22 January 2007.

On 29 January 2007, 15 days after initial presentation, the female's appetite and activity had improved, although it was not completely back to normal levels. However, bloodwork showed that the hematocrit concentration had dropped dramatically, to 19.3%, with a hemoglobin concentration of 6.4 g/dl. Repeated samples confirmed the severity of the anemia. There was no evidence of hemolysis and mean corpuscular volume (MCV) (128 fl), mean corpuscular hemoglobin (MCH) (42 pgm/cell), and mean corpuscular hemoglobin concentration (MCHC) (33 g/dl) remained within her normal ranges, but target cells were subjectively increased. Fibrinogen level had returned to within her normal range, at 500 mg/dl. Fecal parasite check and fecal occult blood tests were negative. Urinalysis, fecal cytology, iron panel, mineral panel, estrogen level, and coagulation panel results were within acceptable limits. Based on the diagnostic test results and clinical signs, a recent episode of acute internal hemorrhage was suspected. Empiric treatment with ceftiofur (Naxcel®, Pfizer Animal Health, New York, New York 10017, USA) was administered at 6–8 g i.m. s.i.d. beginning on 29 January 2007, for a total of 23 days.

By 7 February 2007, 24 days after initial presentation, the elephant's appetite and activity had returned to normal baseline levels and s.i.d. to every other day blood samples showed a gradual increase in the hematocrit concentration, to 28.7%, and in the hemoglobin level, to 9.1 mg/dl. At that time, the elephant was given 30 mg detomidine (Dormosedan® 10 mg/ml; Pfizer Animal Health, New York, New York, 10017,

USA) and 30 mg butorphanol i.m. (Torbugesic® 10 mg/ml; Pfizer) for standing sedation in an elephant restraint device to allow for rectal and transabdominal ultrasound evaluation by an experienced elephant ultrasonographer. An additional 10 mg detomidine and 10 mg butorphanol were administered i.m. as a supplement to deepen sedation at approximately 60 min into the procedure. Transabdominal ultrasound was performed on the left side; no evidence of free fluid was identified, and the spleen, part of the caudal liver lobe, and intestinal loops appeared normal. Transrectal examination of the caudal abdomen was performed by using a 3.5 MHz convex transducer to scan the caudal region of the genital tract and by using a 5.0 7.5 MHz transducer attached to a specially designed probe extension to scan the cranial region. The examination revealed a large mass consistent with a blood clot, estimated at more than 18 L, which expanded the vagina and extended into the uterus (Fig. 1A). The uterus was drawn ventrally into the abdominal cavity and could not be examined in its entirety. Visibly enlarged blood vessels were identified on the dorsal surface of the reproductive tract near the cervix (Fig. 1B). Although these vessels were considered likely to be associated with a vascular tumor, no masses consistent with a tumor could be identified, possibly due to the limited visualization of the ventrally displaced uterus. The caudal lobe of the left kidney appeared normal, and no fluid was noted in the caudal pelvic flexure.

The most likely cause for this elephant's episode of colic followed by severe anemia was considered to be hemorrhage into the vagina and uterus. Underlying reproductive tract pathology was strongly suspected. Differentials included leiomyoma, cystic endometrial hyperplasia, uterine artery rupture, neoplasia, or infection, but the etiology could not be definitively determined due to limited visualization of the reproductive tract, which was expanded and weighed down by the suspected blood clot. The decision was made to resolve the reproductive tract pathologies by using a GnRH vaccine (Repro-BLOC).

MATERIALS AND METHODS

The elephant had been conditioned to venipuncture without sedation, as part of the normal management routine. Blood was collected from an ear vein approximately weekly, generally in the morning. The blood sample was maintained at approximately 4°C, allowed to clot at room temperature, then centrifuged (approximately

1,500 g) and frozen. Serum was stored at 20°C or colder until analysis.

The Repro-BLOC vaccine was first administered on 27 March 2007 at a dose and dose interval proven effective to sterilize heifers: 3 mg s.c., with a booster vaccination of 3 mg s.c. given approximately 14 wk later, on 3 July 2007.¹¹ Based on serial evaluation of serum progestagen concentrations and GnRH antibody titers, 3 additional boosters of increasing dosage (7.5 mg on 29 November 2007, 8 mo after initial injection; 12.5 mg on 27 March 2008, 12 mo after the initial injection; 30 mg on 20 November 2008, 20 mo after the initial injection) were given. The total injection volume increased from 4.5 to 22 ml, with increases in dosage; the volume of each dose was divided in two and administered s.c. by hand injection at two sites on the neck.

Management changes during the study interval included no longer asking the elephant to lie down or perform activities that were thought likely to disrupt the blood clot in her reproductive tract and potentiate further hemorrhage. Ibuprofen and Cosequin treatments were discontinued in case they were contributing to any tendency to bleed; no negative clinical effect of this change was observed. Monitoring by keepers included daily assessment of appetite, attitude, and activity level, and for vaccine site reactions, and for any indication of hemorrhage.

CBC and chemistry panels were obtained at least weekly in 2007, at least twice a month in 2008, and at least monthly with twice monthly hematocrit concentration assessments in 2009. Urine was submitted for urinalysis at least twice monthly throughout the years 2007 to 2009, primarily to monitor for hematuria. Follow-up rectal ultrasound examinations under standing sedation as previously described were performed in April of 2007 and April of 2009.

Anti-GnRH antibody titers were determined in sera at a 1:100 dilution by using a ¹²⁵I-GnRH radioimmunoassay.³³ Titer results were obtained from samples collected approximately weekly from 19 March 2007 (just before the initial vaccination) through 6 February 2008 and then approximately every 2 wk through 6 January 2010. Serum progestagens were analyzed by using a solid-phase ¹²⁵I-progesterone radioimmunoassay (Coat-a-Count®, Siemens Diagnostic Products Corporation, Costa Mesa, California 92626, USA) validated for elephants.⁷ Serum FSH and LH concentrations were quantified by using double antibody ¹²⁵I radioimmunoassays validated for elephants.⁶ Hormone results were analyzed

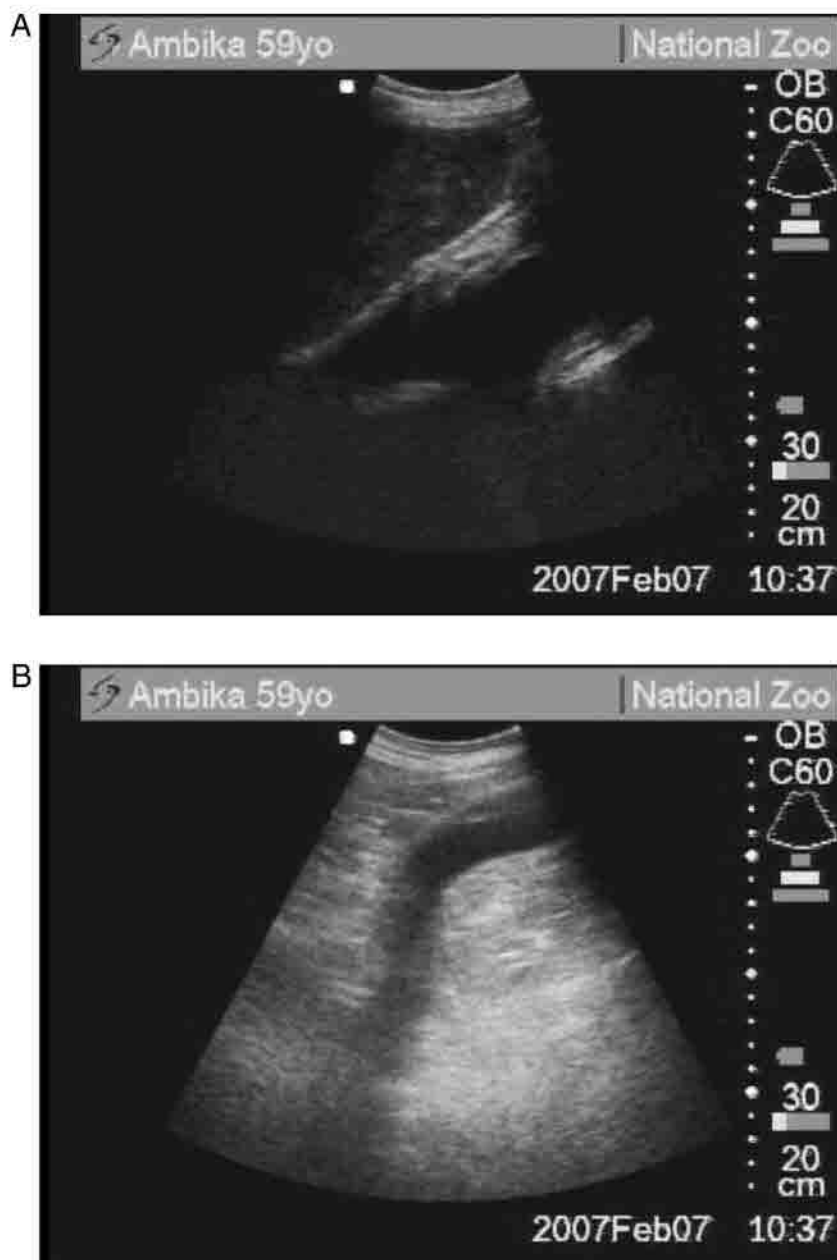


Figure 1. Ultrasound images from the 7 February 2007 examination, showing (A) the distended vaginal canal at the top of the image and a suspected blood clot enlarging to the left from the cervix with the urinary bladder below and (B) an enlarged blood vessel adjacent to the distended vagina. Images provided by Dr. Dennis Schmitt.

from samples collected approximately weekly from 4 January 2006 to 6 January 2010.

Statistical methods

To determine this elephant's estrous cycle patterns, baseline progestagen concentrations

were calculated by using an iterative process previously developed for Asian elephants.⁸ All data points with values above the mean plus two times the standard deviation (SD) were removed, and the process was repeated until no values that exceeded the mean plus two times the SD remained. The remaining data points defined the

baseline, and all points above that were considered part of a luteal phase. The highest point in each luteal phase was considered the peak. Estrous cycle duration was calculated as the number of weeks from the first increase in serum progestagens until the next increase. Peaks of LH and FSH levels also were determined by using the same iterative process by excluding values that exceeded the mean plus two times the SD.⁸

Titer and hormone data were subjected to statistical time series analysis and also were modeled with the ASTRA program with SPSS Statistics (ver. 20, 2011, IBM Corp. Armonk, New York 10504, USA) used for simple descriptive statistics, tests of assumptions, and general linear model hypothesis testing and modeling.⁵⁰ Autoregressive integrated moving average models were fit to the data for each of the variables. By using these models, the differences in cyclicity over time were examined by trend analysis methods that are related to ordinary least-squares regression.⁵⁰ In addition, the relationship over time intervals before and after vaccine introduction was examined. The variables were divided into six intervals based on the timing of vaccine administrations.

RESULTS

Health and ultrasound examinations

The elephant's appetite, attitude, activity, and weight had remained at normal levels with no recurrence of colic throughout the study period. The anemia fully resolved by 14 February 2007, and CBC parameters remained within normal ranges. Chemistry panel values remained unremarkable other than a period of mild intermittent hyperglycemia of undetermined etiology, with a low-level glucosuria in May 2009. Rare trace positive blood results on urine dipstick have been identified without elevations in red blood cells on microscopic urine sediment examination.

Episodes of passage of small volumes of mucohemorrhagic discharge after urination were noted occasionally in 2006 (prevaccination) as well as in 2007 and 2008. Cytologies of this suspected vaginal discharge revealed mild hemorrhage, mild granulocytic, and histiocytic inflammation, and small numbers of gram-positive cocci widely scattered in mucous suggestive of mild vaginitis. Pigment identified within the macrophages was consistent with hemosiderin and suggested breakdown of the ultrasonographically identified blood clot or potentially breakdown of clots from more recent undetected bleeding. This discharge continued intermittently until mid Oc-

tober 2008, approximately 1 mo before administration of the final vaccine booster, and has not been noted in the following 3 yr since this report.

A transient mild localized reaction occurred at both injection sites within 24 hr after the first GnRH vaccination; firm, nonpainful, subcutaneous swellings persisted for approximately 2 mo. A warm, firm, subcutaneous swelling developed as well at both injection sites after the final vaccine administration, which, in contrast to the first vaccination reaction, was sensitive to touch and caused guarded neck movement. The elephant's apparent discomfort resolved with treatment with ibuprofen (6,000 mg p.o. s.i.d.) for 3 days, but the firm subcutaneous swellings have persisted 2 yr later. Other than these local reactions, no negative adverse effects associated with the vaccine had been noted.

A transrectal ultrasound evaluation on 2 April 2007, approximately 11 wk after initial presentation and 6 days after administration of the first GnRH vaccination, revealed an approximately 10-cm-diameter, well-encapsulated, relatively homogenous, soft tissue mass in the cranial vagina. Blood vessels were identified in the capsule but not within the mass itself. Fluid and pseudomembranous tissue surrounded the mass, but there was no evidence of ongoing hemorrhage. Due to the location of the vaginal mass, there was concern that enlargement could compress the urethra and cause obstruction to urine flow and potential renal compromise. The uterus was again difficult to visualize in its entirety but appeared small, irregular, and misshapen, with prominent, visibly enlarged blood vessels, interpreted as being more suggestive of an infectious or neoplastic process than of menopausal changes. Fibrosis and cysts were identified in both kidneys.

A follow-up transrectal ultrasound was performed on 19 April 2009, approximately 5 mo after the last booster was administered and when serum monitoring had indicated cessation of ovarian cyclicity in conjunction with a rise in GnRH antibody titers. A 10-cm diameter vaginal cyst just beyond the opening to the vestibule was observed. Both ovaries appeared small and inactive (Fig. 2A). The uterus was small and indistinct, with a visible decrease in size of the uterine vessels compared with the previous studies (Fig. 2B). The vaginal soft tissue mass identified in April 2007 appeared to have resolved, and no clot or active hemorrhage associated with the reproductive organs was identified. The ultrasound findings supported the hormonal data that indicated cessation of ovarian cyclicity and reproduc-



Figure 2. Ultrasound images from the 19 April 2009 examination, showing (A) an inactive ovary and (B) the inactive uterus in cross section. Images provided by Dr. Thomas Hildebrandt.

tive quiescence. No progression of the renal changes was identified.

Serum GnRH antibody titer, progestagen, and LH and FSH profiles

GnRH percent binding data in sera diluted at 1:100 is presented in Figure 3A. Time series regression indicated a significant change in bind-

ing over time, and a quadratic trend fit to these data showed a monotonically increasing trend ($P < 0.001$). Dividing these time-dependent observations for antibody titers into six time periods starting before the first dosage resulted in significantly different and increasing means ($P < 0.001$), with SDs that increased until time period 4, then decreased (Table 1). The change in GnRH titer remained nonsignificant until after the sec-

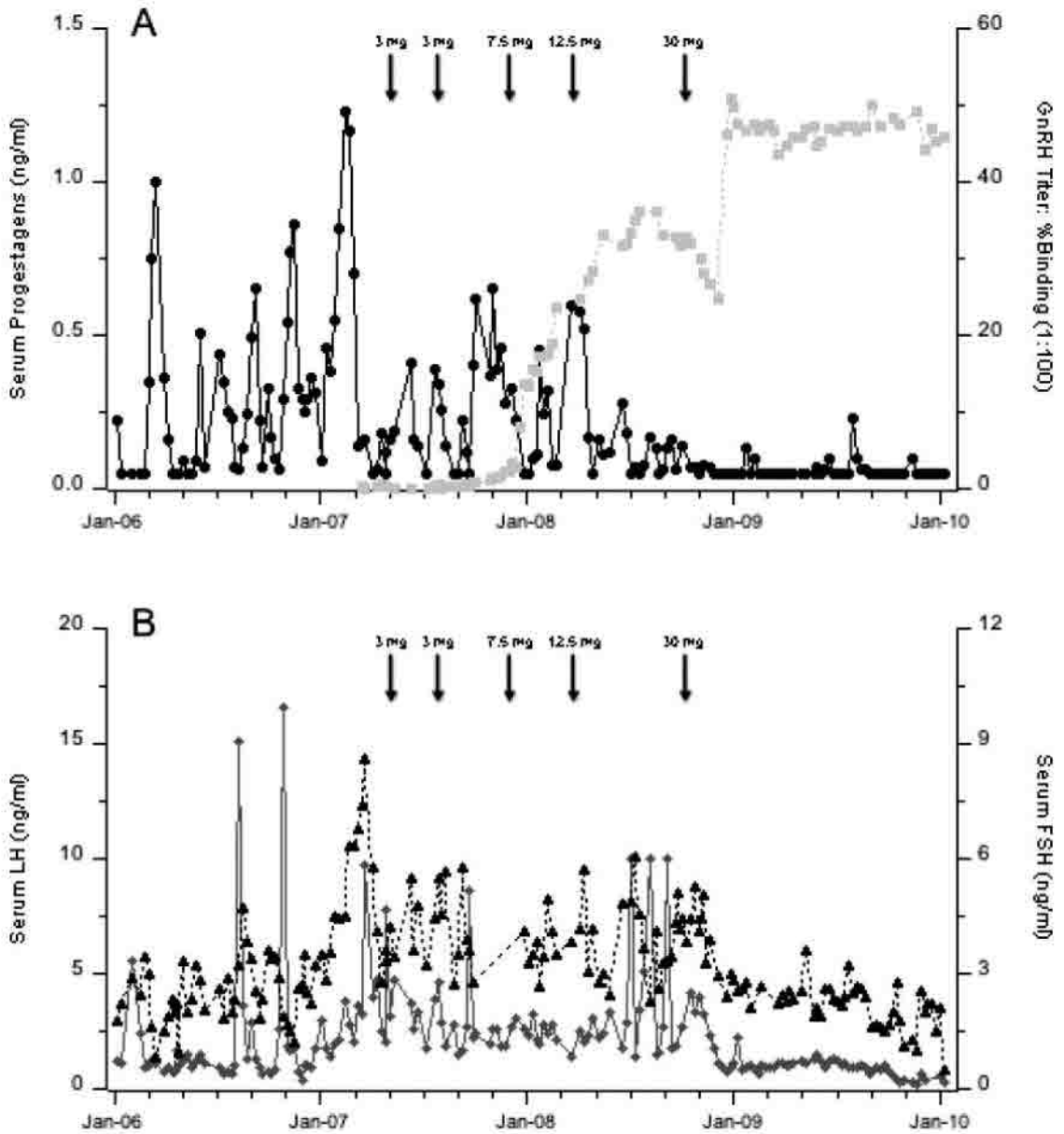


Figure 3. Profiles of (A) serum progesterone (●) and gonadotropin releasing hormone (GnRH) titers (■) indicated by the percentage binding of sera diluted at 1:100; and (B) serum luteinizing hormone (LH) (◆) and follicle stimulating hormone (FSH) (▲) concentrations in an Asian elephant administered a GnRH vaccine. Vaccination dosages were administered at each of five time points indicated by the arrows.

and 3-mg dose was given on 3 July 2007 in time period 3, after which titers exhibited a continuous and significant increase. The slope of this linear fit was significant as were the two sets of combined observations ($P = 0.001$). The variances, like the means, also were significantly different across these periods ($P = 0.0001$). Although a quadratic trend could be fit, it was apparent that there was a

significant change induced after time period 3. In considering all data, there were 2 distinct groups of time periods, which consisted of time periods 1 through 3, and time periods 4 through 6 (Table 1).

The length of the female's estrous cycle before vaccination (time period 1) averaged 14.1 ± 0.5 wk, with a mean peak progestagen concentration of 0.78 ± 0.4 ng/ml (range, 0.45–1.23 ng/ml).

Table 1. GnRH antibody titer, progesterone, LH, and FSH levels, means (SDs) and (ranges), during six time periods, pre- and postvaccination.^a

Time period	Date range	Vaccine dose (mg) ^b	GnRH antibody titer (% binding)			Progesterone (ng/ml)			LH (ng/ml)			FSH (ng/ml)		
			n	Mean (SD)	Range	n	Mean (SD)	Range	n	Mean (SD)	Range	n	Mean (SD)	Range
1	1/4/06-3/26/07	0	1	-0.09 ± 0	0.09	53	0.34 ± 0.30	0.05-1.23	53	2.32 ± 3.09	0.34-16.54	53	3.06 ± 1.62	0.83-8.59
2	3/27/07-7/2/07	3	15	-0.01 ± 0.23	-0.32-0.52	10	0.15 ± 0.11	0.05-0.41	10	3.85 ± 1.65	2.05-7.78	12	4.18 ± 0.91	2.77-5.77
3	7/3/07-11/28/07	3	21	0.83 ± 0.91	-0.35-3.28	17	0.28 ± 0.19	0.05-0.65	17	2.82 ± 1.71	1.51-8.63	12	4.25 ± 1.12	2.71-5.77
4	11/29/07-3/26/08	7.5	13	16.55 ± 6.57	2.68-27.13	15	0.20 ± 0.17	0.05-0.60	15	2.81 ± 1.82	1.44-9.14	14	4.27 ± 1.20	2.66-6.85
5	3/27/08-11/19/08	12.5	16	31.31 ± 3.02	24.67-36.11	27	0.14 ± 0.13	0.05-0.58	27	3.45 ± 2.52	1.35-10.00	30	4.03 ± 0.96	2.27-6.07
6	11/20/08-1/6/10	30	29	46.93 ± 1.68	43.66-50.83	56	0.06 ± 0.03	0.05-0.23	53	0.92 ± 0.36	0.16-2.25	48	2.23 ± 0.59	0.49-3.61

^a GnRH, gonadotropin-releasing hormone; LH, luteinizing hormone; FSH, follicle-stimulating hormone; SD, standard deviation.^b Vaccine doses were administered on the first day of each of the time periods 2 through 5.

Serum progesterone concentrations decreased after GnRH vaccination, with a definitive cessation in ovarian cyclicity and luteal function after the final 30-mg vaccine dose (Fig. 3A; Table 1). The variances, like the means, were significantly different across time ($P = 0.001$). A linear, not a quadratic trend could be fit to the mean values over the time periods ($P = 0.0001$). However, it was apparent that there was a significant change in progesterone concentrations after time period 3 (Table 1). When considering the prevaccine time period 1 as a baseline, Dunnett's test showed that time periods 3 and 4 were not different from baseline, whereas the subsequent time periods 5 and 6 were lower ($P = 0.013$). The average estrous cycle length through time period 4 was 13.9 ± 0.6 wk, with a mean peak progesterone concentration of 0.45 ± 0.06 ng/ml (range, 0.40–0.65 ng/ml). In time periods 5 and 6, after the 12.5-mg dose, only 4 clear cycles were observed; the average length had decreased to 10.1 ± 0.3 wk, and progesterone peak concentrations had decreased from a high in time period 4 of 0.60 ng/ml to successive declining peak concentrations of 0.28, 0.17, 0.16 and 0.14 ng/ml (Fig. 3A). Thereafter, serum progesterone concentrations remained at or near baseline (<0.07 ng/ml).

After an initial increase compared with the prevaccination baseline (time period 1), mean LH and FSH concentrations decreased, with the greatest effect observed after the final 30-mg booster, more than 1.5 yr after the initial vaccination (Fig. 3B; Table 1). When examined as serial data, only time periods 1 and 6 were statistically different from the remainder ($P < 0.001$). Mean LH, which was more variable, declined to 0.92 ng/ml at time period 6, from a baseline of 2.32 ng/ml, whereas mean FSH declined to 2.23 ng/ml at time period 6, from a baseline of 3.06 ng/ml. The decline in gonadotropin secretion occurred coincident with the suppression of serum progesterone concentrations. This decrease in mean concentrations was associated with a dampening of pulsatile LH and FSH secretion in time period 6, as evidenced by a decrease in the SDs (Table 1). Peak concentrations of LH exceeded 6 ng/ml nine times, and peak concentrations of FSH exceeded 4 ng/ml eight times through time period 5. No significant pulses of LH or FSH were observed in time period 6 after the 30-mg dose was given.

DISCUSSION

This is the first published report, to the authors' knowledge, on the effects of a GnRH

vaccine on health and reproductive function of a female Asian elephant. Altogether, GnRH antibody titer, serum hormone, ultrasonographic, and clinical results strongly suggest that the cessation of ovarian cyclicity and the associated decrease in uterine size and vascularity occurred as a result of GnRH vaccination. The significant increase in GnRH antibody binding was inversely related to a sustained suppression in LH and FSH secretion and in serum progestagens after the final booster was administered. Based on time-series analyses, effects of the vaccine on GnRH and progestagens were evident after the 12.5-mg booster (time period 5), approximately a year after the initial injection. Significant effects on LH and FSH secretion were observed after the final 30-mg booster. The vaccinations were well tolerated, with no adverse effects other than relatively minor localized reactions at the injection sites after two of the five vaccinations. Any appreciable discomfort associated with these subcutaneous swellings resolved quickly. Thus, the results of this current study suggest that GnRH vaccination is a safe and effective method for resolving significant health problems associated with uterine pathologies likely caused by continuous ovarian cyclicity.

Caution in not overinterpreting these results is advised, however, because only one female was studied. A definitive diagnosis of the underlying pathology that led to the strongly suspected hemorrhage into this elephant's reproductive tract and associated severe anemia could not be determined. In addition, it cannot be determined with certainty if this elephant would have hemorrhaged again without therapy. Although analysis of limited laboratory data suggests that female Asian elephants can continue cycling normally into their 60s (Brown, unpubl. data), it is possible that this geriatric female would have stopped cycling naturally without vaccine administration. However, the strong correlation in timing of the rise in GnRH antibody titer with the cessation of ovarian cyclicity, appearance of reproductive quiescence on ultrasound and resolution of intermittent mucohemorrhagic vaginal discharge makes this possibility seem unlikely.

GnRH vaccination has potential for treating reproductive tract disorders, such as endometriosis and ovarian tumors, as well as prostate and breast cancer and other diseases driven by gonadal steroids.^{21,34,46,53} In elephants, common pathologies of the reproductive tract, particularly in nulliparous females, include leiomyomata and cystic endometrial hyperplasia. Although these processes are thought to be generally benign, they

are suspected to contribute to infertility and could lead to erosion of vessels and associated hemorrhage.^{24,28} Cessation of cycling through GnRH vaccination would be expected to decrease the likelihood of negative outcomes with these pathologic conditions, and the likelihood of significant negative adverse effects is considered low.^{11,16,18,20,26,39}

Many factors can influence the immune response to GnRH vaccination, including individual genetic and immune status variation, patient age, vaccine dose, species variation in regard to optimal adjuvants, and the conjugant and specific design used in the manufacture of the vaccine.^{17,19,20,40,41,48,54} Preliminary evaluation of a GnRH vaccine for control of aggression and musth behavior in bull elephants has shown some degree of variation in the response of individuals, and this phenomenon has been noted in a variety of other species.^{2,13,23,30,32,52} More work clearly is needed to optimize the dose and frequency of vaccination when using the Repro-BLOC formulation in elephants, because it took more than a year for the effects to be realized. It is not clear why this elephant required multiple boosters before the desired effect of vaccination occurred. The initial doses administered may have been too low, the dose intervals could have been suboptimal, the adjuvant used may not be as immunostimulatory in elephants as in beef cows, or this individual's immune response could have been compromised due to age or disease status. Other GnRH vaccines are available, some of which are being designed for multiyear contraceptive effects after a single injection and act more rapidly in tested species, within weeks (e.g., GonaConTM, National Wildlife Research Center, USDA-APHIS Wildlife Services, Fort Collins, Colorado 80521, USA), but they have not been evaluated in female elephants.^{36,37,41,43} The initial doses of Repro-BLOC used in this study were based on data in cattle in which peak antibody titers were reached 2 wk after administration of a 1.5-mg booster (16 wk after initial injection of 1.5 mg).¹¹ Based on the progestagen and possibly the FSH results, suppression of ovarian activity in this elephant was not evident until after the 12.5-mg dose, whereas a significant effect on LH was evident only after the final 30-mg dose. However, it cannot be concluded that 12.5 mg is the optimal dosage or that the cumulative effects of multiple doses over time were not significant. But once the response occurred, it has been sustained, and the elephant continues to be reproductively suppressed. Ongoing routine progestagen monitoring that continues to date, con-

tinues to show that concentrations average less than 0.07 ng/ml, 3 yr after the final booster. The reversibility of this vaccine approach in elephants now remains to be determined.

Based on studies in other species, GnRH vaccination also offers exciting possibilities as a new option for potentially reversible contraception in female elephants.^{3,18,30,36,41,43} In elephant bulls, GnRH vaccination has shown efficacy in suppressing testosterone production and musth behaviors, presumably by similarly inhibiting pituitary control of gonadal steroidogenic activity.^{2,13,14} A carefully managed contraception strategy would be of particular value in areas of high elephant density in close proximity to humans to mitigate human-elephant conflicts and in game parks where protected space and resources are limited. It would be beneficial to compare the efficacy, duration of effect, reversibility, long-term health and genetic effects, and social and behavioral effects of GnRH vaccination in elephants with those of porcine zona pellucida vaccination, which prevents fertilization by blocking sperm binding to the egg and is currently used in female elephants for contraception.^{2,12,14,15,38,47} Porcine zona pellucida vaccination would not be efficacious for resolving health problems associated with ovarian steroidogenic activity, however, because contracepted females continue to cycle.

Acknowledgments: The authors thank the staff of the Smithsonian Conservation Biology Institute (SCBI)'s National Zoological Park's Departments of Animal Health, Pathology, and Animal Programs for their contributions to this case. Particular thanks go to curator, Tony Barthel, and biologist, Marie Galloway, for their long-standing dedication to the management and care of our Asian elephants and for overseeing sample collection. The authors also thank Drs. Dennis Schmitt, Thomas Hildebrandt, Frank Goritz, and Robert Hermes for their ultrasound expertise and input into the management of this case. The authors thank Drs. Valeria Conforti and Jerry Reeves for their work in development of the Repro-BLOC vaccine and advice regarding dosing. In addition, we thank SCBI technician, Nicole Parker, for running all of the endocrine analyses. In addition, the authors thank the Smithsonian Institution librarian, Polly Lasker, for her invaluable assistance with obtaining reference materials. The authors are grateful to Amplicon Vaccine for donating the Repro-BLOC vaccine and reagents for antibody testing. Finally,

thanks to Ambika for being such a cooperative patient and excellent elephant ambassador.

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Received for publication 7 December 2011

GnRH Vaccination in Elephants

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This summary is based on existing publications, personal experience of the authors with the GnRH vaccines in female Asian elephants as well as own research projects on male Asian and African elephants.

What is a GnRH vaccine?

The GnRH vaccine is a prepared inoculant designed to induce an immune response against the endogenous hormone GnRH. GnRH stands for "Gonadotropin Releasing Hormone" which is secreted by the hypothalamus. The GnRH is the beginning of a hormonal chain reaction, the hypothalamic-pituitary-gonadal-axis (Fig. 1). In fact, the secretion of GnRH triggers the release of further hormones, the gonadotrophins Luteinizing Hormone (LH) and Follicle Stimulating Hormone (FSH) from the pituitary gland. As their common name suggests, these hormones act on the gonads (testicles, ovaries) and up-regulate their function. In females, this is the growth, maturation (FSH) and ovulation (LH) of follicles and the subsequent secretion of estrogens and progesterone. In males, the gonadotrophins are responsible for the development of sperm (FSH) and the secretion of testosterone (LH).

Comparable to a "flu shot", the GnRH vaccine triggers anti-body production by introducing a stranger protein to the body's immune system. In response to the injection of the protein-conjugated, exogenous GnRH, antibodies will neutralize GnRH produced naturally in the body (Fig. 2). By binding onto the body's own GnRH, the antibodies prevent the GnRH from taking its action, because now it is unable to bind to its receptors in the pituitary (= hypophysis, Fig. 2). Subsequently, no LH or FSH is released anymore and the testicles or ovaries will not be stimulated and become inactive.

Thus, the GnRH vaccine is not an administered external hormone, but stops the endogenous GnRH action by stimulation of an immune response against its own hormone. Originally, the GnRH vaccine was developed for male piglets and cattle, due to welfare issues arising against surgical castration (Bonneau and Enright, 1995, Dunshea et al., 2001). It has since been used in a variety of animals to control fertility.

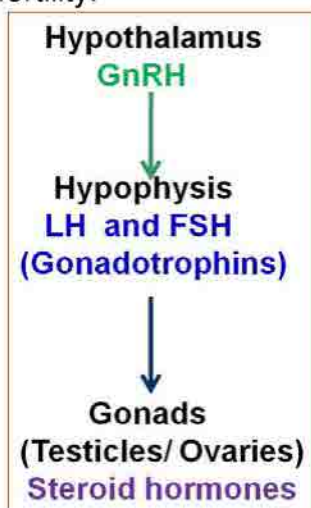


Fig. 1 hypothalamic- pituitary -gonadal -axis

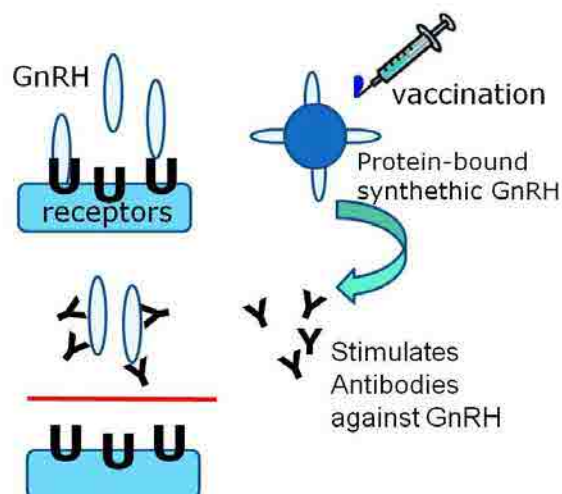


Fig. 2 Schematic of the GnRH vaccine action

Available GnRH vaccines

The company Zoetis (formerly Pfizer Animal Health) began marketing several commercially available GnRH vaccines recently. It started with a horse formulation for suppression of estrus in performance mares in Australia, but soon it got licensed for the meat production industry and made its big appearance in pig and cattle breeding. Table 1 gives an overview of available products.

Table 1 Examples of different GnRH vaccines available today

Brand Name	Target species	Conc.	Company	Used in elephants
EquiTy	Horse	200 µg/ml	Zoetis	yes
Improvac	Pig	150µg/ml	Zoetis	yes
Improvect	Pig	200µg/ml	Zoetis	yes
Bopriva	Cattle	400µg/ml	Zoetis	yes
GonaCon	Feral/pest animals	?	USDA, USA	no
ReproBloc	Domestic, non food animals	?	Amplicon Vaccine LLC, USA	yes
GnRH vaccine	Pig	500 µg/ml	Pepscan, NL	yes

GnRH vaccination in elephants

Lately, GnRH has been suggested as a non-surgical method to control testosterone levels and musth in bull elephants or to prevent uterine pathologies in females (Stout et al., 2007). However, very little is known about the dosages, vaccination intervals, long-term and side effects of this drug in elephants. The total number of studied elephants comprises of 12 captive Asian elephant bulls (Rajapaska et al., 2010; Lueders et al., 2014; Somgrid et al., 2015) and 19 captive and 4 wild African elephant males (De Nys et al., 2010; Bertschinger & Sills, 2013; Lueders et al., 2013; Doughty et al., 2014). Only 7 Asian elephant females (Boedeker et al., 2012, 2013) and a group of 8 wild African elephant females (Benavides Valades et al., 2012) are mentioned in studies on GnRH vaccine use in female elephants. Although all of these studies give valuable input on the topic, they mainly focus on hormone secretion, and for males, on testosterone related behaviour. We will add the results for a total of 13 captive and 4 wild African elephants bulls soon, including our findings on the effect of sperm production and ultrasonographic changes in reproductive organs (Lueders et al, in prep). The few published studies that exist, suggest clear differences between the effectiveness in male and female elephants in respect to vaccination intervals and effectiveness. For example, appears testosterone suppressed after primer and booster injection in males (Lueders et al., 2013) for at least 5 months, whereas in female African elephants this injection regime did not result in full suppression of estrus cycles (Benavides Valades et al., 2012).

Current knowledge Male elephants

Captive, adult male Asian and African elephants have been monitored in terms of testosterone levels and behaviour (De Nys et al., 2010, Rajapaska et al., 2010, Lueders et al., 2013; Somgird et al., 2015). In general, all authors found a

suppression of testosterone levels and/or suppression of musth in most elephants after two to three injections. Behaviour was modified in certain individuals, which appeared calmer and more attentive to their handlers. Only one subadult Asian elephant male was treated and monitored for testosterone, behaviour, body condition, reproductive organ changes and sperm production (Lueders et al., 2014). This male, who was 7 years at beginning of the study, was treated for 6 years and showed no testosterone production, small testicles, general cessation of reproductive organ growth with underdeveloped penis and no sexual interest or aggression. This male is kept in a group of hands-on females and behaves well. He did not gain as much weight as another male of his age, but his height growth was not altered. He looks more feminine now, resembling a female Asian elephant with tusks.

Antibody titers were shown to rise after 2-3 injections in adult Asian elephant males (Somgrid et al., 2015). However, they remained elevated for only 2 months. Monthly boosters were therefore given in several studies at least at the beginning of the treatment (Rajapsaka et al., 2010; Lueders et al., 2014, Somgrid et al., 2015). In a study with monthly injections for three consecutive months, testosterone levels were back to initial levels about 5 months after the last injection. Similar, in African elephant bulls with 4 injections in 3-7 week intervals, testosterone was back to normal or bulls entered musth 6 months after the last booster (De Nys et al., 2010). In general, longer treatment will cause longer reversal time or even permanent infertility. In the case of the young male in the study of Lueders et al., (2014), the last treatment occurred more than 4 years ago and this bull remained at baseline testosterone levels and appears castrate-like (person comm., Feb. 2016, Charlie Gray, African Lion Safari, Canada).

Correspondingly, evidence out of our test on African elephants over a 3 year course suggests permanent damage, especially in younger individuals (Lueders et al, 2013; Lueders et al., in prep.).



*Fig.3 Penis size of treated Asian elephant bull (left) suggest inability to breed compared to similar aged half brother without GnRH vaccine and normal penis development (right). From Lueders et al., 2014; **B**: image provided by Prof. Henk Bertschinger of a 16 -year old African elephant bull with noticeable penis atrophy treated with GnRH for three years (Bertschinger and Sills (2013)).*

Current knowledge Female elephants

For female elephants, even less data on the effects of GnRH vaccination are available. The main reasons may be that in a captive situation, females are desperately needed for breeding and there appears no need to treat older, post-reproductive females with a contraceptive. In southern Africa, however, where

contraception is warranted to reduce fecundity, a different, female immuno-contraceptive is already widely applied and highly successful. The pzP-vaccine prevents fertilization of oocytes, while estrous cyclicity remains (Delsink et al., 2002; 2006).

In aged Asian elephant females suppression of ovarian function may be indicated because they are known to develop uterine leiomyoma, especially when they do not reproduce (Montali et al., 1997; Hermes et al., 2004). These tumors of the smooth muscle layer of the uterus (myometrium) are benign and do not pose problems in many cases, but their growth is stimulated by ovarian hormones. Nulliparous, cyclic females >40 years are at increased risk that these tumors break through the mucosal inner layer (endometrium) of the uterine lumen and cause bloody discharge and subsequent uterine infection. Extreme growth of the tumors can also cause pain and obstruction of pelvic organs. We recently were involved in a case of a 50+ years individual bearing a uterus destroyed by a leiomyoma which weighted 375 kg at necropsy (person. communication Hanspeter Steinmetz, 25.Juni 2015).

Studies are currently underway in the U.S. to look at the use of GnRH vaccines to stop or even regress leiomyoma growth and to prevent these problems in post-reproductive females (Boedeker et al., 2012; Boedeker et al., 2013). First results are promising, as induction of anestrus and regression of tumors appears successful (Boedeker et al., 2012, 2013). However, in comparison to some studies in male elephants, it seems that for the suppression of ovarian function, more frequent vaccination intervals and higher doses of GnRH are necessary (Boedeker et al., 2012, person. comm. Janine Brown, March 2016, Fig. 4). This is supported by the results of other authors on wild African elephant females (Benavides Valades et al., 2012). Here, the vaccination schedule of two injections with 600 µg GnRH conjugate (Improvac®) given 5-7 weeks apart resulted in incomplete effectiveness with no complete anestrus (Valades et al., 2012). Dr. Janine Brown reported that they now always use doses of 1000 µg GnRH conjugate in females.

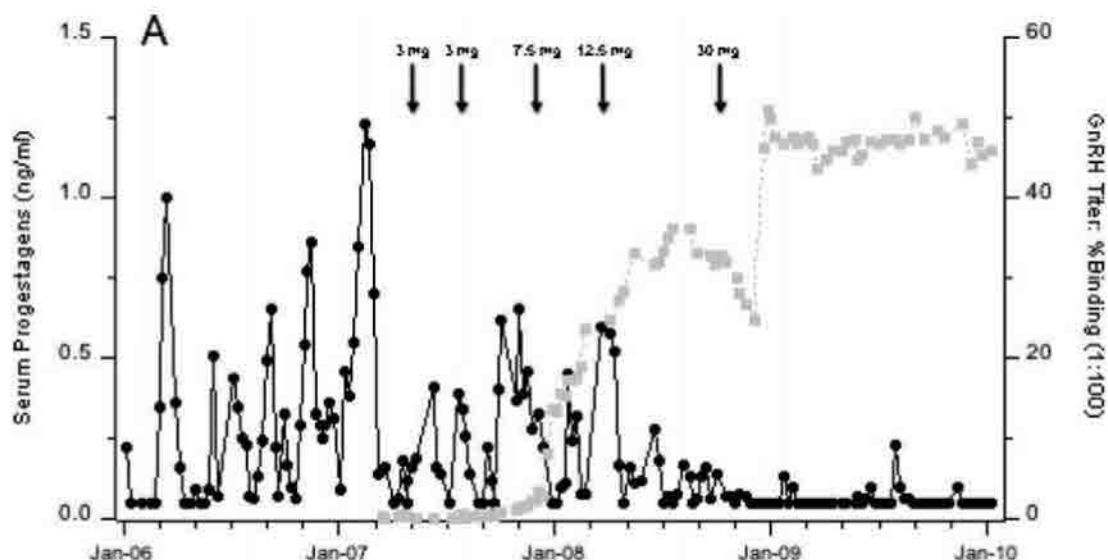


Fig. 4 Profile of serum progesterone (black) and GnRH antibody titers (grey) in relation to vaccination (arrows) of different GnRH conjugate concentrations (Repro-Bloc®), from the publication of Boedeker et al., 2012 on a female Asian elephant treated with GnRH vaccine. Note that titers rose only after increased dose and at least 3 injections!

Recognized Problems associated with the GnRH vaccination

General

In general long term studies are missing for both, male and female elephants. In addition there are no studies on pathologies caused by GnRH vaccinations. From other species it is known for example, that the injection causes acute inflammatory reactions with swelling and pain and we noticed this occasionally in elephants (Fig. 5A). We also saw limping after vaccination into the hind leg for one day in one elephant bull. Abscesses are possible as after any injection, but we have not heard about any case in elephants as of yet. However, a female Indian rhino treated with the vaccine developed a large abscess (pers. comm. Dr. Christine Geiger, Nov. 2015). In the long term, granulomas can be found in the musculature at injection site (e.g. deer, Curtis et al., 2008) which is due to the adjuvant used in these vaccines. Some elephants are reported to feel generally ill up to two days after vaccination with reduced food intake and signs of discomfort (pers. comm. Dr. Tobias Knauf-Witzens, Jan. 2016). A rise in body temperature has been recorded in other species such as cattle (Theubet et al., 2010).



Fig 5. A. Male African elephant showing large swelling at injection site one day after re-vaccination. B. To our knowledge the longest so far treated African elephant bull: He received 6 monthly boosters over the past 13 years (30 years old when photographed, 3.36 cm high, managed in full contact).

Males

Since the GnRH vaccine was not designed to be reversible in the first place, another problem is that it is not known exactly from which point it will produce permanent infertility. Reversibility is already questionable in young males after 2 injections since severe testicular degeneration was reported in other species (deer, sheep: Janett et al., 2003, Curtis et al., 2008). Our studies indicate severe degeneration of testicles (size reduction by up to 60%, amorphous shape, dilated blood vessels and fibrosis) and penis atrophy in male elephants treated for more than 3 years (Lueders et al., 2013; Lueders et al., 2014; Lueders et al, in prep., Fig 3).

Long-term effects (elephants treated for more than 10 years) on the elephants health are also not known. We are aware of one bull in South Africa being on the vaccine for the past 13 years (Fig. 5B). He seems to show no problems related to the vaccination so far. However, in elephant bulls there seems to be a difference in the individual reaction: non-responders are reported in both, Asian elephant (Rajapsaka et al.,

2010, Somgrid et al., 2015) and African elephant bulls (De Nys et al., 2010). Since the effectiveness of a vaccination is always dependent on the immune response, this might explain the individual effects. We have also recognized one African elephant bull in our study that did respond much less than all other males studied, although he was treated in the same manner (Lueders et al., in prep). In the same study on wild and captive African elephant bulls, we noticed a change in hierarchy/rank/dominance. This has been also noted in a study on one wild African bull treated with Improvac® (Doughty et al., 2014). In the latter study, 8 monthly intervals with 3ml of Improvac® were not sufficient to suppress musth, so that the dose needed to be increased to 6ml every 5 months. In conclusion, monitoring of the success of the vaccine by hormone measurement and ultrasound are always important.

Females

Another potential risk has been detected for female elephants: The vaccine is often recommended when clinical signs in form of discharge from the vestibulum occur. This discharge can be mucus, blood, tissue pieces (when parts of the leiomyoma become necrotic) or pus (Fig 6).



Fig. 6 Not uncommon: aged Asian elephant females start discharging blood from the vestibulum when leiomyoma have grown large enough. This may be related to the follicular phase of the estrus cycle. Vaccination should be rather started prior to any discharge, to avoid uterine infection!

All these symptoms, especially in older cows (>40 years) are likely a result of uterine leiomyoma. Investigations as to what the source of discharge is are always recommended! One reason for discharge in old females is that the myometrial tumors broke through the endometrial barrier into the uterine lumen. Continuous discharge of any material presents a great risk of bacterial infection. On top, continuous blood loss can cause anemia. Before GnRH vaccines were available commercially, experiments were undertaken with GnRH agonists to suppress estrus cycles. In a case report by Aupperle et al. (2008), a female was treated with Deslorelin implants to induce acyclicity, reduce tumor growth and prevent further bleeding. While this treatment appeared successful (no ovarian activity and no discharge were noticed anymore after implanted), the elephant died a year later with an enormous pyometra and 250 litres of accumulated pus inside the uterus (Aupperle et al, 2008). With this example in mind, it must be considered that any possible remaining uterine content (mucus, pus, necrotic tissue etc.) may not be discarded anymore once estrus cycles cease and the cervix remains closed. Closure of the cervix due to the interruption of ovarian activity and thus stopping the natural "clearance mechanism of the uterus" should be considered in elephants with any form of discharge prior to treatment with GnRH vaccines. Regular cycle monitoring, ultrasound check up, an intense course of antibiotics and monitoring of leucocyte count are very important. We encountered two worrying cases in this respect: in a 50+ year old female, the GnRH vaccination was

not performed, as uncontrollable infection and massive tumor growth were suspected. This Asian elephant passed necrotic tumorous tissue at the size of a soccer ball three months after ultrasound diagnosis during a new follicular phase. If this necrotic tissue would not have been passed, it may have caused further problems. In another case, GnRH vaccine treatment was started, the female developed abdominal edema, weight loss, and pussy discharge. The vaccination was stopped and the animal treated first with several courses of antibiotics. Only after ultrasound examination and strict regular blood analysis the GnRH vaccine treatment appeared save to continue. These examples are to show that any GnRH vaccination needs proper evaluation of the female prior to start of vaccination in order to avoid animals to be harmed. At the same time, it should be considered to start vaccination before leiomyoma cause these problems.

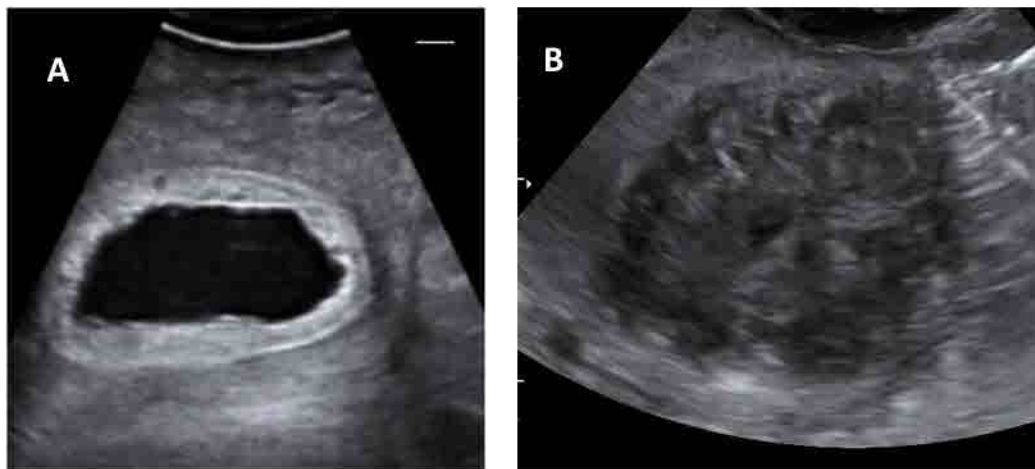


Fig. 7 Examples for pathological uterine findings during ultrasound in female Asian elephants: A. Pyometra: fluid content in uterine horn (black) and inflamed endometrium (white) → vaccination would be detrimental! This condition needs treatment before GnRH vaccination may be considered; B. Leiomyoma in uterine horn destroyed normal appearance at this stage, no distinction of myometrium and endometrium possible anymore → GnRH vaccination may prevent further growth and damage.

Advice for the use of GnRH vaccination in captive elephants based on current knowledge

	Action	Comment
EEP approval	Always inform EEP coordinator/ vet advisors about vaccination plans & receive approval	The vaccine should NEVER be administered to future breeding animals!
Health check/ Blood collection	Hematology, Blood chemistry, body condition, overall health	Prior to vaccination, the elephant should undergo a health screening, immunocompromised elephants will not respond properly to the vaccine!
Hormone monitoring	Female: Measuring of progesterone in serum or its metabolites in urine/feces to check for estrus cycles Male: check testosterone levels	Females: Progestagens 6 months prior to vaccination and at least six months after first injection. Males: Testosterone for 3 months prior to vaccination and at least 6 months after. Continuous monitoring is advised!
Ultrasonography	Prior to vaccination, 6 months after and then at least yearly	Reproductive organ size and pathologies need to be recorded, any abnormalities (e.g. fluid accumulation in the uterus) can be picked up in time, elephants with bloody or pussy discharge have a high risk of uterine infection and development of serious pyometra
Dosage administered	600-1000µg	Dose depends on animal status and age and formulation used, as they may have different concentrations per ml in different products (Table 1)
Route of administration	Deep intramuscular	Long needle is essential to avoid subcutaneous deposition, for hand injection the best region is into neck muscle, by dart in the gluteal region
Injection Interval	Females: 1 st Booster 4 weeks after primer injection, then every months for at least 3 months, then every 4 months, after 1 year, every 6 months, then maybe spaced out to yearly injections. Males: may respond to a lower regime: 1 st Booster 4 weeks after primer injection, then booster every 5 months	There are differences reported in the response, females need higher doses and shorter treatment intervals apparently, antibody titer rises after second or third injection only. So at the beginning, short intervals should be chosen which may be extended later on, after hormone or antibody titer measurement confirmed effectiveness.
Side –Effects (may occur, but not necessarily!)	1. Local reaction (Heat/Swelling) at injection side 2. Lameness 3. Elephant feeling not well 4. Femininisation 5. Behavioural changes	1. Resolves within 10 days 2. Resolves within 1-2 days 3. Seen for up to 2 days with elevated temperature. 4. Males look less masculine 5. Dominant animals may become more quiet, lose their status
Reversibility	Unknown!	Studies on adult male elephants suggest reversibility possible when only 2 or 3 injections were given, any longer treatment or treatment of prepubertal animals may cause permanent damage!

Summary

- An immunocontraceptive – no hormone based contraception!
- Commercially available. Usually in the form of Improvac ©, produced for pigs, but used already in several other (wildlife) species.
- Cheap to buy and easily administered by IM injection
- Can be administered by qualified veterinarian using syringe or dart
- No oral effectiveness, if product or treated animal is ingested
- Important to administer deeply intramuscular, or can cause swellings
- Booster required 4-6 weeks after first injection, regular doses required at 1-6 months intervals thereafter, depending on individual, sex, age etc.
- Antibody titers rise after 2-3 injections of at least 600µg GnRH conjugate and remain elevated for a minimum of two months.
- Booster intervals may be required in 1-2 months intervals at the beginning and may be spaced out over time
- Tested primarily as measure to reduce/reverse pathological changes (leiomyoma) in aged Asian elephant females or as an immuno-castration method in bulls .- proven effects on fertility (sperm quality; testes size and shape, etc.) after third injection
- Has been used successfully to suppress aggressive behaviour and musth in bull Asian and African elephants (see attached publications)
- Testosterone levels usually reduced drastically after two injections
- Changes in behaviour noticeable in most (but not all) bulls. Most bulls are reportedly more relaxed, less aggressive, more attentive to their handlers. Changes in destructive behaviour, such as breaking fences have also been noted.
- It must be emphasized that some bulls do not display these behavioural changes in the same manner due to learned behaviours and personal life histories. Downplay of aggressive tendencies is the trend, but is not guaranteed!
- Can cause changes in dominance hierarchies within groups of both, males and females. If the dominant bull is vaccinated, a younger or less dominant bull has been seen to change behaviour and try to dominate, causing further behavioural changes in other animals within the group. Behavioural changes in females may become apparent as well and may cause (or solve...) conflicts and changes of hierarchial order in existing groups.
- Reversibility is not necessarily possible and depends on duration of vaccination, sex and age as well as on individual properties of the elephant.
- In most species, no effect on pregnancy or lactation is expected, however these effects are unknown in elephants and thus treatment of pregnant/lactating elephants is not recommended!
- CAUTION: do not self-inject, the vaccine is harmful to humans and may cause fertility problems in any species!

Literature (elephant GnRH vaccine related articles marked in bolt)

Aupperle, H., Reinschauer, A., Bach, F., Hildebrandt, T.B., Goeritz, F., Jäger, K., Scheller, R., Klaue, H.-J., and Schoon, H.-A (2008). Chronic endometritis in an Asian elephant (*Elephas maximus*). *J. Zoo. Wildl. Med.* **39**: 107-110.

Benavides Valades, G.B., A. Ganswindt, H. Annandale, M. L. Schulman, and H. J. Bertschinger. 2012. Non-invasive assessment of the reproductive cycle in free-ranging female African elephants (*Loxodonta africana*) treated with a gonadotropin-releasing hormone (GnRH) vaccine for inducing anoestrus. *BMC Reprod. Biol. Endocrinol.* **10:63. (8 free-roaming African elephant females, SA)**

Bertschinger H.J. and Sills E.S. (2013) Contraceptive applications of GnRH-analogs and vaccines for wildlife mammals of southern Africa: current experience and challenges. In: Gonadotropin-Releasing Hormone (GnRH). Production, Structure and Function. Scot Sills (Ed), Nova Science Publications Inc, New York 2013.

Boedeker, N.C., L.-A. C. Hayek, S. Murray, D. M.de Avila, and J. L. Brown. (2012). Effect of a gonadotropin-releasing hormone vaccine on ovarian cyclicity and uterine morphology of an Asian elephant (*Elephas maximus*). *J. Zoo Wildl. Med.* **43: 603-614. (1 adult Asian elephant female, USA)**

Boedeker N., Schmitt D, Brown J. (2013) GnRH Vaccination as a Treatment for Reproductive Tract Pathologies in Female Elephants (Contraception for Post-Reproductive Cows? Why Close the Door After the Cow is Out?). Proceedings of the International Elephant and Rhino Conservation and Research Symposium, Pittsburgh, USA, Sept. 2013. (7 adult female Asian elephants, captive, USA)

Bonneau, M., & Enright, W. J. (1995). Immunocastration in cattle and pigs. *Livestock Production Science*, **42**(2): 193-200.

Curtis, P. D., Richmond, M. E., Miller, L. A., & Quimby, F. W. (2008). Physiological effects of gonadotropin-releasing hormone immunocontraception on white-tailed deer. *Human-Wildlife Interactions*, **68**

Delsink, A. K., Van Altena, J. J., Kirkpatrick, J., Grobler, D., & Fayrer-Hosken, R. A. (2001). Field applications of immunocontraception in African elephants (*Loxodonta africana*). *Reproduction (Cambridge, England) Supplement*, **60**, 117-124.

Delsink, A. K., Van Altena, J. J., Grobler, D., Bertschinger, H., Kirkpatrick, J., & Slotow, R. (2006). Regulation of a small, discrete African elephant population through immunocontraception in the Makalali Conservancy, Limpopo, South Africa. *South African Journal of Science*, **102**(9), 403-408.

De Nys, H.M., H.J. Bertschinger, J.A. Turkstra, D. Colenbrander, R. Palme, and A.M. Human. (2010). Vaccination against GnRH may suppress aggressive behaviour and musth in African elephant (*Loxodonta africana*) bulls – a pilot study. *J. S. African Vet. Ass.* **81: 8–15 (1 free, 5 captive African bulls, South Africa)**

Doughty, L. S., Slater, K., Zitzer, H., Avent, T., & Thompson, S. (2014). The impact of male contraception on dominance hierarchy and herd association patterns of African elephants (*Loxodonta africana*) in a fenced game reserve. *Global Ecology and Conservation*, **2, 88-96. (1 free roaming African elephant bull, South Africa)**

Dunshea, F.R., C. Colantoni, K. Howard, I. McCauley, P. Jackson, K.A. Long, S. Lopaticki, E.A. Nugent, J.A. Simons, J. Walker, and D.P. Hennessyn. (2001). Vaccination of boars with a GnRH vaccine (Improvac) eliminates boar taint and increases growth performance. *J. Anim. Sci.* **79**:2524-2535.

Hermes R, Hildebrandt TB, and Goritz F. (2004). Reproductive problems directly attributable to long-term captivity – asymmetric reproductive aging. *Anim. Reprod. Sci.* **82-83**:49-60.

Janett F., Lanker U., Jörg H., Hässig M., Thun R. (2003) Die Kastration männlicher Lämmer mittels Immunisierung gegen GnRH. *Schweiz. Arch. Tierheilk*, 145: 291-299.

Lueders, I., Hildebrandt, T. B., Gray, C., Botha, S., Rich, P., & Niemuller, C. (2014). Suppression of testicular function in a male Asian elephant (*E. maximus*) treated with Gonadotropin-Releasing vaccines. *Journal of Zoo and Wildlife Medicine*, 45(3), 611-619. (1 subadult Asian, Canada)

Lueders I, Young D, Botha S, Gray C, Luther I, Maree L, van der Horst G, Bertschinger HJ (2013). Suppression of testicular function by means of a GnRH vaccine in African elephant bulls. *Proceedings of the International Elephant and rhino Conservation and Research Symposium*, Pittsburgh, USA, Sept. 2013 (2 wild, 11 captive African elephants, South Africa)

Lueders I, Young D, Maree L, van der Horst G, Luther I, Botha S, Tindall B, Ganswindt A., Bertschinger H (in prep.). Effects of GnRH vaccination on reproductive organs and spermatogenesis in wild and captive African elephant bulls (*Loxodonta africana*). Manuscript in preparation (4 wild, 13 captive African elephant bulls, SA)

Montali R.J., Th. Hildebrandt, F. Göritz, R. Hermès, R. Ippen and E. Ramsay (1997) Ultrasonography and pathology of genital tract leiomyomas in captive Asian elephants: Implications for reproductive soundness. *Verh.ber. Erkrq.Zootiere* (1997) 38.

Rajapaska, R.C., I.P.G.H.U. Dissanayaka, C.Somgird, C. Thitaram, A. Sirimalaisuwan, P.G.A. Pushpakumara, B. Colenbrander, J.L. Brown, B.M.A.O. Perera, and T.A.E. Stout. (2010). Efficacy of GnRH vaccination for suppressing musth and aggressive behavior in male Asian elephants. *EU-Asia Link Project Symposium "Managing the Health and Reproduction of Elephant Populations in Asia"* May 2010. Faculty of Veterinary Medicine, University Chiang Mai, Thailand. Pp. 114 -116. (6 captive Asian elephant males, Sri Lanka)

Somgird, C., Homkong, P., Sripiboon, S., Brown, J. L., Stout, T. A., Colenbrander, B., Mahasawangkul., S. & Thitaram, C. (2015). Potential of a gonadotropin-releasing hormone vaccine to suppress musth in captive male Asian elephants (*Elephas maximus*). *Animal Reproduction Science*. (5 captive Asian elephant males, Thailand)

Stout, T. A. E., Bertschinger, H. J., & Colenbrander, B. (2007). The use of GnRH vaccines for reproductive suppression in horses and elephants. In *Proceedings of the EU-Asia Project Symposium "Managing the health and reproduction of elephant populations in Asia": 8-10 October 2007; Bangkok* (pp. 115-119).

Theubet, Thun, Hilbe, & Janett. (2010). Wirkung einer Impfung gegen GnRH (Bopriva®) beim männlichen pubertären Kalb. *Schweizer Archiv für Tierheilkunde*, 152(10), 459-469.

From: [Hadjis, Tonya - APHIS](#)
To: [Benson, Amy V - APHIS](#)
Subject: FW: Complaint AC19-587 RW Commerford & Sons 1940
Date: Tuesday, October 29, 2019 4:09:00 PM
Attachments: [AC19-587.docm](#)
[AC19-587.pdf](#)

Amy,

Could you please extend the due date on this complaint to Nov 8th? Due to unforeseen circumstances the inspectors have not been able to complete the response although they have started with initial inspection.

Thanks

Tonya

From: Hadjis, Tonya - APHIS
Sent: Wednesday, October 9, 2019 7:07 AM
To: Baltrush, Jan J - APHIS <jan.p.baltrush@usda.gov>; Gladue, Paula S - APHIS <paula.s.gladue@usda.gov>
Subject: FW: Complaint AC19-587 RW Commerford & Sons 1940

Good morning Jan and Paula,

Do you think you can follow up on this complaint by the end of next week please?

Thanks

Tonya

From: Benson, Amy V - APHIS
Sent: Monday, September 23, 2019 5:21 PM
To: Baltrush, Jan J - APHIS <jan.p.baltrush@usda.gov>; Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Cc: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>; Neafsey, Michael F - APHIS <michael.f.neafsey@usda.gov>
Subject: Complaint AC19-587 RW Commerford & Sons 1940

I included the links below – I wasn't sure if you would be able to get them through the pdf files

Video Footage:

(b) (6), (b) (7)(C)

Additional Radio/Media Coverage:

https://www.westernmassnews.com/news/animal-rights-groups-speak-out-after-beulah-asian-elephant-at/article_f551c5c6-da7a-11e9-9447-7b0c6c8d62b7.html

<https://www.speaker.com/user/wpro/jill-alibrandi>

Sincerely,

Amy Benson
Inspection & Licensing Assistant
Program Support
USDA APHIS Animal Care
Phone: (970) 494-7478

Please send all paperwork to our new mailing address:

Fort Collins: 2150 Centre Ave., **Building B, 3W11**, Fort Collins CO, 80526

Our previous email addresses have been combined. For future communication, please use:

Email: Animalcare@usda.gov

[Join the Animal Care Stakeholder Registry and receive emails on topics of interest](#)

We are happy to announce that we have introduced an online self-service tool to assist you in determining the appropriate application to complete as required under the Animal Welfare Act (AWA).

Visit efile.aphis.usda.gov/LRAssistant to complete the 5 to 15 minute questionnaire that will recommend the specific license and/or registration types required (if any) and provides links to download those applications.

From: [Hadjis, Tonya - APHIS](#)
To: [McKinnie, Carolyn - APHIS](#)
Subject: FW: Complaint AC19-592 Commerford & Sons 1940
Date: Friday, November 8, 2019 3:57:00 PM
Attachments: [AC19-592.pdf](#)
[AC19-592 Commerfords.docm](#)

Carolyn,

Enclosed is the other complaint AC19-592 that was filed before Beulah died and had been sent originally to the state of CT.

Please let me know of any questions!

Tonya

From: Benson, Amy V - APHIS
Sent: Friday, September 27, 2019 11:18 AM
To: Baltrush, Jan J - APHIS <jan.p.baltrush@usda.gov>; Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Cc: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>; Neafsey, Michael F - APHIS <michael.f.neafsey@usda.gov>
Subject: Complaint AC19-592 Commerford & Sons 1940

Please see the attached files.

Sincerely,

Amy Benson
Inspection & Licensing Assistant
Program Support
USDA APHIS Animal Care
Phone: (970) 494-7478

Please send all paperwork to our new mailing address:

Fort Collins: 2150 Centre Ave., **Building B, 3W11**, Fort Collins CO, 80526

Our previous email addresses have been combined. For future communication, please use:

Email: Animalcare@usda.gov

[Join the Animal Care Stakeholder Registry and receive emails on topics of interest](#)

We are happy to announce that we have introduced an online self-service tool to assist you in determining the appropriate application to complete as required under the Animal Welfare Act (AWA).

Visit efile.aphis.usda.gov/LRAssistant to complete the 5 to 15 minute questionnaire that will recommend the specific license and/or registration types required (if any) and provides links to download those applications.

From: [McKinnie, Carolyn - APHIS](#)
To: [Hadjis, Tonya - APHIS](#)
Subject: FW: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20
Date: Thursday, December 19, 2019 11:18:34 PM
Attachments: [Commerford 12.pdf](#)
[Commerford 11.pdf](#)
[Commerford 10.pdf](#)
[Commerford 9.pdf](#)
[Commerford 8.pdf](#)
[Commerford 7.pdf](#)
[Commerford 6.pdf](#)
[Commerford 5.pdf](#)
[Commerford 4.pdf](#)
[Commerford 3.pdf](#)
[Commerford 2.pdf](#)
[Commerford 1.pdf](#)

Fyi

Tonya,

Hoping you are feeling much better today.

I'm sending you the draft responses next.

******Would you please send me the histopathology report on Beulah.** I know you sent it to me previously yet a search of my email and folders resulted in no report. I do have the gross.
Thank you, Carolyn

From: Gibbens, Robert - APHIS
Sent: Thursday, December 19, 2019 11:37 AM
To: Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>
Cc: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>; Dunigan, Anne H - APHIS <anne.dunigan@usda.gov>
Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

The last 3 years of inspection reports are attached. Carolyn and Tonya are working on the questions. The only citation is on "Commerford 2", I left 3 photos attached to that inspection report.

From: Goldentyer, Betty J - APHIS
Sent: Thursday, December 19, 2019 10:40 AM
To: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>
Subject: Fwd: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Bob

Can you get with Katie and start on this. Probably need the inspectors to answer the questions.

Thanks

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From: Frederick, Mandi M - APHIS <mandi.m.frederick@usda.gov>
Sent: Thursday, December 19, 2019 12:04 PM

To: Dunigan, Anne H - APHIS; Needham, Christopher M - APHIS; McNally, Andrea C - APHIS
Cc: Goldberg, Ruth - APHIS; Taylor, Kimberly A - APHIS; Goldentyer, Betty J - APHIS; Anderson, Christa - APHIS
Subject: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Hi all,

I'm attaching a letter that LPA just received from Senator Blumenthal's office about Commerford Zoo in Connecticut. As you'll see, the Senator is concerned about the welfare of animals at the zoo particularly in light of the deaths of 2 elephants. He's asked 5 specific questions and asked for 9 years worth of inspection reports. The Secretary will be signing the response. Could you please read over this letter and provide guidance on how to best respond?

Chris—I'm not sure if we need to answer each of his questions in turn. If it was an oversight letter, I'm sure we would but in this case, do we need to? And if we do need to answer each question—Anne, can AC please provide the input?

RE: Inspection reports—Andrea, can we give these out or would we need to ask the Senator to file a FOIA for them?

Since Secretary Perdue is signing this letter, we need to move it rather quickly so if you could **please get me your input by tomorrow at noon**, that would be great. I should also note that I'm looping in others in LPA b/c I will be on leave next week so someone else is likely to draft or take over this response.

Thank you!

Mandi M. Frederick
Writer/Editor--Executive Communications
Legislative and Public Affairs
APHIS-USDA
4700 River Rd., Unit 49
Riverdale, MD 20737
2A02.30
(301) 851-4095

From: [McKinnie, Carolyn - APHIS](#)
To: [Hadjis, Tonya - APHIS](#)
Subject: FW: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20
Date: Thursday, December 19, 2019 11:24:38 PM
Attachments: [Commerford Eles 10-7-19 signed PSG.pdf](#)
[12-19-19 Baltrush Commerfords Memo to Sen Blumenthal.docx](#)
[AC19-587 Commerfords 10.19 JB cjm signed.docm](#)
[AC19-592 Commerford complaint response sgnd.docm](#)
[FW Response Needed Questions about Commerford Zoo from Sen. Blumenthal.msg](#)
[FW Response Needed Questions about Commerford Zoo from Sen. Blumenthal.pdf](#)

Tonya, I pulled out some of our emails earlier to flesh some of this out. If you are working Friday, please let me know if you think something is missing. I'll be checking my email early tomorrow morning to see if Bob needs anything else.

Thanks, Carolyn

From: McKinnie, Carolyn - APHIS
Sent: Thursday, December 19, 2019 8:11 PM
To: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>; Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>
Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>
Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Hi Bob,

Here's what I have compiled based on input from Paula Gladue, Jan Baltrush and Tonya Hadjis. I've added directly to the questions below.

For additional context if needed, I've attached memo's from Paula Gladue and Jan Baltrush, two recent complaint responses involving the Commerford elephants as well as previous emails responding to questions from Blumenthal's office (via Anne Dunigan).

Jan noted that Blumenthal's letter states that the Commerfords have been licensed since May 2000. This is incorrect as she has been inspecting them since Oct. 1988 and they were licensed prior to that. Based on the Commerford's license # 16-C-0006, she believes that they were the sixth exhibitor to get a license back in 1970.

Please let me know if anything needs to be clarified. I'll check my email first thing tomorrow morning in case you have any other questions.

Thanks, Carolyn

From: Gibbens, Robert - APHIS
Sent: Thursday, December 19, 2019 10:18 AM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>; Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>
Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>
Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Great -- here's a start. Thanks.

1. What were the initial and final causes of death for elephants Karen and Beulah?

- (b) (5), DPP [REDACTED]

2. Could those deaths have been prevented? (b) (5), DPP

[REDACTED]

3. What is USDA's role after unexpected exotic animal deaths?

- (b) (5), DPP [REDACTED]

4. How does USDA ensure that the veterinarian performing the necropsy is qualified and renders an independent opinion?

- (b) (5), DPP [REDACTED]

5. Why did Commerford Zoo continue to pass USDA inspections wider AWA despite the premature deaths of two elephants?

- (b) (5), DPP [REDACTED]

memo

USDA APHIS Animal Care

To: Tonya Hadjis, DVM
From: Paula S. Gladue, VMD
CC:
Date: 10/7/19
Re: Commerford Elephants

Comments:

This purpose of this memo is to summarize past conversations that took place in conjunction with an inspection of Commerford elephants 8/10/16 as I remember them.

I have participated in inspections of the Commerford animals at various times since I've been with Animal Care. In particular, in August 2016 I inspected the elephants at the home site in response to complaint AC16-549. One of the allegations in that complaint was that the elephant "Beulah" was observed to be "peeing blood" one evening in July 2016 while she was on exhibit at the Broome County Fair in Binghamton, NY.

Here is the text copied from the complaint response that I prepared 8/15/16 that pertains to this allegation:

"The licensee stated that the Asian elephant named "Beulah" was at the Broome County Fair in NY and did pass a red-colored material from her body on that date. The elephant handler who was on-site at the NY fair contacted the licensee by phone to report it when he noticed the discharge. The licensee explained and I confirmed by phone with the Attending Veterinarian (AV) that several years ago "Beulah" was diagnosed with a medical condition that includes the infrequent passage of a dark red to purple in color mucoid, stringy material from her vulva as one of the clinical signs. The AV has observed the discharge, assessed the elephant, performed diagnostic testing, has given the licensee recommendations to follow, and continues to monitor the elephant for changes. The elephant has not exhibited any discomfort or physical problems from this medical condition. In addition the licensee contacted the AV by phone to report the episode of discharge after it

happened. The APHIS inspector saw the call log entry on the licensee's phone and also confirmed the call with the AV."

As stated in the complaint response, I did contact and speak with the AV following the inspection to corroborate the information that the Licensee had told me. The AV confirmed that "Beulah" had a history of passing bloody material from her vagina periodically for several years. The AV's presumptive diagnosis was fibromatous changes to the uterine lining based on history, physical exam(s) when she was actively passing the bloody discharge, diagnostic testing, and consultations he had made with veterinarians experienced with the care of elephants.

According to reports in the literature, uterine changes are common in older female elephants especially when the female has never given birth. There has been interest for several years among veterinarians and others interested in the health and management of captive elephants, in the development and use of a Gonadotropin-releasing hormone vaccine (GnRH) to treat or manage these common uterus changes seen in aging elephant cows as well as hormonal treatment to suppress testicular function in bull elephants.

Three of the recent articles in scientific publications include: (1) EFFECTS OF A GONADOTROPIN-RELEASING HORMONE VACCINE ON OVARIAN CYCLICITY AND UTERINE MORPHOLOGY OF AN ASIAN ELEPHANT (*ELEPHAS MAXIMUS*); authored by Nancy C. Boedeker, D.V.M., Lee-Ann C. Hayek, Ph.D., Suzan Murray, D.V.M, Dipl. A.C.Z.M., David M. de Avila, and Janine L. Brown, Ph.D; Journal of Zoo and Wildlife Medicine, 43(3):603-614. 2012; (2) GnRH VACCINATION IN ELEPHANTS; authored by Dr. Imke Lüders, Dr. Ann-Kathrin Oerke; published on the egzac.org website (the EAZA group on Zoo Animal Contraception is a group formed to gather knowledge on the use of contraception in captive wildlife within Europe); May 2016; and (3) SUPPRESSION OF TESTICULAR FUNCTION IN A MALE ASIAN ELEPHANT (*ELEPHAS MAXIMUS*) TREATED WITH GONADOTROPIN-RELEASING HORMONE VACCINES; authored by Imke Lueders, D.V.M., Dr. med. vet., Thomas Bernd Hildebrandt, D.V.M., Dr. med. vet., Prof., Charles Gray, Stephan Botha, M.Sc., Peter Rich, D.V.M., and Cheryl Niemuller, M.Sc., Ph.D.; Journal of Zoo and Wildlife Medicine, 45(3):611-619, 2014.

PAULA GLADUE
Digitally signed by PAULA
GLADUE
Date: 2019.10.07 16:20:30
-04'00'

Paula S. Gladue, VMD
10/7/19

From: McKinnie, Carolyn - APHIS

Sent: Thursday, December 19, 2019 11:14 AM

To: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>; Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>

Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>

Subject: Re: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Hi Bob, I will work with the inspectors on this today. As an FYI (b) (6), (b) (7)(C) I am familiar with this as I worked closely with Hadjis on the 2 elephant complaint responses. Carolyn

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From: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>

Sent: Thursday, December 19, 2019 10:04:35 AM

To: Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>

Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>; McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>

Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Never mind about my suggested deadline, just saw we need to forward by 12/20.

From: Gibbens, Robert - APHIS

Sent: Thursday, December 19, 2019 10:58 AM

To: Betty J - APHIS Goldentyer (betty.j.goldentyer@usda.gov) <betty.j.goldentyer@usda.gov>

Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>; Carolyn - APHIS McKinnie (carolyn.j.mckinnie@usda.gov) <carolyn.j.mckinnie@usda.gov>

Subject: FW: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Yes, we'll get answers to the questions from Hadjis/inspector. Do we need 10 years of inspections or 3? The deadline in the letter is January 18; if we get it to Mandi by January 7, would that be okay?

Thanks.

From: Goldentyer, Betty J - APHIS

Sent: Thursday, December 19, 2019 10:40 AM

To: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>

Subject: Fwd: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Bob

Can you get with Katie and start on this. Probably need the inspectors to answer the questions.

Thanks

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From: Frederick, Mandi M - APHIS <mandi.m.frederick@usda.gov>

Sent: Thursday, December 19, 2019 12:04 PM

To: Dunigan, Anne H - APHIS; Needham, Christopher M - APHIS; McNally, Andrea C - APHIS

Cc: Goldberg, Ruth - APHIS; Taylor, Kimberly A - APHIS; Goldentyer, Betty J - APHIS; Anderson, Christa - APHIS

Subject: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Hi all,

I'm attaching a letter that LPA just received from Senator Blumenthal's office about Commerford Zoo in Connecticut. As you'll see, the Senator is concerned about the welfare of animals at the zoo particularly in light of the deaths of 2 elephants. He's asked 5 specific questions and asked for 9 years worth of inspection reports. The Secretary will be signing the response. Could you please read over this letter and provide guidance on how to best respond?

Chris—I'm not sure if we need to answer each of his questions in turn. If it was an oversight letter, I'm sure we would but in this case, do we need to? And if we do need to answer each question—Anne, can AC please provide the input?

RE: Inspection reports—Andrea, can we give these out or would we need to ask the Senator to file a FOIA for them?

Since Secretary Perdue is signing this letter, we need to move it rather quickly so if you could **please get me your input by tomorrow at noon**, that would be great. I should also note that I'm looping in others in LPA b/c I will be on leave next week so someone else is likely to

draft or take over this response.

Thank you!

Mandi M. Frederick

Writer/Editor--Executive Communications

Legislative and Public Affairs

APHIS-USDA

4700 River Rd., Unit 49

Riverdale, MD 20737

2A02.30

(301) 851-4095

From: [McKinnie, Carolyn - APHIS](#)
To: [Dunigan, Anne H - APHIS](#)
Cc: [Hadijs, Tonya - APHIS](#)
Subject: FW: Response Needed: Questions about Commerford Zoo from Sen. Blumenthal
Date: Wednesday, October 9, 2019 10:19:52 AM
Attachments: [Commerford Files 10-7-19 signed PSG.pdf](#)
[Beulah Commerford.pdf](#)
[Open AC19-592.pdf](#)

Hi again Anne,

I was able to dig up some more information about the Commerford zoo last night. I've added the information below. When the SACS returns from leave I can ask her what week they plan to inspect but per complaint guidelines it must be before 10/29/19

I hope this answers your questions. If you need anything else, would you please text me at (b) (6), (b) (7)(C) so that I can try to make contact with the inspector?

Thank you, Carolyn

From: Dunigan, Anne H - APHIS <anne.dunigan@usda.gov>
Sent: Tuesday, October 8, 2019 9:49:06 AM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>; Cunningham, Debbie J - APHIS <debbie.j.cunningham@usda.gov>
Subject: Response Needed: Questions about Commerford Zoo from Sen. Blumenthal

--Good morning Carolyn and Debbie--Hoping you can help me respond to Blumenthal's office.

1. What's the history of USDA inspections at Commerford?

(b) (5), DPP
[Redacted text block]

[Redacted text block]

[Redacted text block]

(b) (5), DPP

2. What steps did USDA take after inspections?

RESPONSE: (b) (5), DPP

3. Is there an autopsy or other medical history of the recent death of Beulah the elephant?

RESPONSE: (b) (5), DPP

Feel free to call 970-494-7398. Thanks, Anne Dunigan

From: Needham, Christopher M - APHIS
Sent: Tuesday, October 08, 2019 9:27 AM
To: Dunigan, Anne H - APHIS <anne.dunigan@usda.gov>
Subject: FW: Questions about Commerford Zoo from Sen. Blumenthal

Hi Anne,

Do you have any info on the below that I can pass along to Senator Blumenthal's office?

Any previous citations? Anything out of the normal here?

Thanks!

Chris Needham

Legislative Director

USDA APHIS

202-799-7027

christopher.m.needham@usda.gov

From: Mayer, Jillian (Blumenthal) <Jillian_Mayer@blumenthal.senate.gov>
Sent: Monday, October 7, 2019 12:14 PM
To: Lee, Evan - OSEC, Washington, DC; Wong, Veronica - OSEC, Washington, DC; SM.OSEC.OCR
Cc: Kehoe, Richard (Blumenthal); Campbell, Shawn (Blumenthal); Kalonia, Maya (Blumenthal)
Subject: Questions about Commerford Zoo from Sen. Blumenthal

To whom it may concern at the USDA Office of Congressional Relations:

I'm an environment & energy staffer in Senator Richard Blumenthal's office. The Senator has questions about USDA's past contact and relationship with with Commerford Zoo. Commerford is a Connecticut-based traveling zoo that has been accused by guests of neglecting/abusing animals for several years. I'm wondering if you could connect me to someone at USDA who can help clarify USDA's authority and actions. My questions are loosely:

1. What's the history of USDA inspections at Commerford?
2. What steps did USDA take after inspections?
3. Is there an autopsy or other medical history of the recent death of Beulah the elephant?

Thanks very much for your help!

Best,

Jillian Mayer

NOAA-Sea Grant Knauss Marine Policy Fellow
US Senator Richard Blumenthal
706 Hart Senate Office Building, Washington, DC 20510
202-224-5794
Pronouns: she/her

From: [Hadjis, Tonya - APHIS](#)
To: [McKinnie, Carolyn - APHIS](#)
Subject: RE: AC19-587 AC19-592
Date: Monday, December 2, 2019 3:14:00 PM
Attachments: [AC19-587 Commerfords 10.19 JB signed.docm](#)
[AC19-592 Commerfords.docm](#)

Carolyn,

These complaints are not closed out in the FY 19 log, would you mind sending me your signed versions and I will work with PS to ensure they get closed out?

Thanks

Tonya

From: McKinnie, Carolyn - APHIS
Sent: Thursday, November 14, 2019 3:25 PM
To: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Subject: RE: AC19-587 Commerford elephant complaint response

That makes sense -I will close.

Thanks Tonya

From: Hadjis, Tonya - APHIS
Sent: Thursday, November 14, 2019 7:31 AM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>
Subject: Re: AC19-587 Commerford elephant complaint response

Do you mind signing them since I was on the inspection, I shouldn't be the reviewer probably.
Thanks

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From: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>
Sent: Thursday, November 14, 2019 8:33:50 AM
To: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Subject: Fwd: AC19-587 Commerford elephant complaint response

Tonya, both complaints are good to go. Please sign and close the complaints. Thanks for all your hard work and persistence on this! Carolyn

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From: Cole, Dana J - APHIS <dana.j.cole@usda.gov>
Sent: Tuesday, November 12, 2019 10:54:50 AM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>
Subject: RE: AC19-587 Commerford elephant complaint response

Thank you, that looks good. Please have the complaint response logged and the complaint closed out.

Appreciate your attention to the details on this! Thanks, Dana

From: McKinnie, Carolyn - APHIS
Sent: Monday, November 11, 2019 6:40 PM
To: Cole, Dana J - APHIS <dana.j.cole@usda.gov>
Subject: FW: AC19-587 Commerford elephant complaint response

Dana, Revised per your recommendations- please let me know if you find this acceptable or if there are other changes you need. Carolyn

From: Hadjis, Tonya - APHIS
Sent: Monday, November 11, 2019 11:43 AM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>
Subject: RE: AC19-587 Commerford elephant complaint response

Hi Carolyn
Please let me know if anything more is needed for this complaint.

Thanks
Tonya

From: McKinnie, Carolyn - APHIS
Sent: Friday, November 8, 2019 3:28 PM
To: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Subject: FW: AC19-587 Commerford elephant complaint response

Hi Tonya,
Please see below. For each entry we need to (b) (5), DPP

[REDACTED]

Let me know if you have any questions,
Thanks, Carolyn

From: Cole, Dana J - APHIS
Sent: Friday, November 8, 2019 12:25 PM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>
Subject: RE: AC19-587 Commerford elephant complaint response

Yes, that's true. But some of the entries (b) (5), DPP

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

We can talk in person next week about my comments if you like. I'm heading out soon. Was supposed to log off at 1pm.

Have a great weekend!

Dana

From: McKinnie, Carolyn - APHIS
Sent: Friday, November 08, 2019 1:20 PM
To: Cole, Dana J - APHIS <dana.j.cole@usda.gov>
Subject: RE: AC19-587 Commerford elephant complaint response

Dana, This complaint and response is all after the fact. Inspectors were not at the Big E fair venue when she died. The only thing we can do in cases like this is to contact the facility and the AV, review medical and health records (if available) and go through each aspect of the complaint with them. This how I've normally seen things written up when we are not there to observe first hand. I'm not sure if I'm answering all your concerns but I'm here to discuss further if you would like...

From: Cole, Dana J - APHIS
Sent: Friday, November 8, 2019 12:03 PM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>
Subject: RE: AC19-587 Commerford elephant complaint response

Thanks Carolyn. I have a couple comments. My main concern is that (b) (5), DPP

[REDACTED]

[REDACTED]

Let me know of questions/concerns. Thanks! Dana

From: McKinnie, Carolyn - APHIS
Sent: Thursday, November 07, 2019 9:49 AM
To: Cole, Dana J - APHIS <dana.j.cole@usda.gov>
Subject: Fwd: AC19-587 Commerford elephant complaint response

Hi Dana,
Please see the attached compliant response for your review.
Let me know of any concerns. Thanks, Carolyn

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From: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Sent: Thursday, November 7, 2019 6:42 AM
To: McKinnie, Carolyn - APHIS

Subject: AC19-587

Carolyn,

Enclosed is the updated (dated 7-Nov-19) complaint response. Please let me know if you've any questions.

Thanks

Tonya

From: Hadjis, Tonya - APHIS

Sent: Wednesday, November 6, 2019 11:51 AM

To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>

Subject: AC19-587

Carolyn,

Enclosed is the original complaint and the response, please review. On the original complaint document, please scroll all of the way down as there is another complaint that was rolled into Ac19-587.

In addition, expect another, smaller complaint that we will send the response up later as well. One inspector is on sick leave today, so there is some delay due to that.

Thanks

Tonya

Tonya Hadjis, DVM

Supervisory Animal Care Specialist

USDA/APHIS/Animal Care

781-999-1587

From: [Hadjis, Tonya - APHIS](#)
To: [McKinnie, Carolyn - APHIS](#)
Subject: RE: AC19-587 Commerford elephant complaint response
Date: Monday, November 11, 2019 2:42:00 PM
Attachments: [AC19-587 Commerfords 10.19 JB signed.docm](#)

Hi Carolyn

Please let me know if anything more is needed for this complaint.

Thanks

Tonya

From: McKinnie, Carolyn - APHIS
Sent: Friday, November 8, 2019 3:28 PM
To: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Subject: FW: AC19-587 Commerford elephant complaint response

Hi Tonya,

Please see below. For each entry we need to (b) (5), DPP [REDACTED]

Let me know if you have any questions,

Thanks, Carolyn

From: Cole, Dana J - APHIS
Sent: Friday, November 8, 2019 12:25 PM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>
Subject: RE: AC19-587 Commerford elephant complaint response

Yes, that's true. But some of the entries (b) (5), DPP [REDACTED]

We can talk in person next week about my comments if you like. I'm heading out soon. Was supposed to log off at 1pm.

Have a great weekend!

Dana

From: McKinnie, Carolyn - APHIS
Sent: Friday, November 08, 2019 1:20 PM
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Subject: RE: AC19-587 Commerford elephant complaint response

Dana, This complaint and response is all after the fact. Inspectors were not at the Big E fair venue when she died. The only thing we can do in cases like this is to contact the facility and the AV, review medical and health records (if available) and go through each aspect of the complaint with them. This how I've normally seen things written up when we are not there to observe first hand. I'm not sure if I'm answering all your concerns but I'm here to discuss further if you would like...

From: Cole, Dana J - APHIS
Sent: Friday, November 8, 2019 12:03 PM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>
Subject: RE: AC19-587 Commerford elephant complaint response

Thanks Carolyn. I have a couple comments. My main concern is that (b) (5), DPP

[REDACTED]

[REDACTED]

Let me know of questions/concerns. Thanks! Dana

From: McKinnie, Carolyn - APHIS
Sent: Thursday, November 07, 2019 9:49 AM
To: Cole, Dana J - APHIS <dana.j.cole@usda.gov>
Subject: Fwd: AC19-587 Commerford elephant complaint response

Hi Dana,
Please see the attached compliant response for your review.
Let me know of any concerns. Thanks, Carolyn

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From: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Sent: Thursday, November 7, 2019 6:42 AM
To: McKinnie, Carolyn - APHIS
Subject: AC19-587

Carolyn,
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Thanks
Tonya

From: Hadjis, Tonya - APHIS
Sent: Wednesday, November 6, 2019 11:51 AM
To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>
Subject: AC19-587

Carolyn,

Enclosed is the original complaint and the response, please review. On the original complaint document, please scroll all of the way down as there is another complaint that was rolled into Ac19-587.

In addition, expect another, smaller complaint that we will send the response up later as well. One inspector is on sick leave today, so there is some delay due to that.

Thanks

Tonya

Tonya Hadjis, DVM

Supervisory Animal Care Specialist

USDA/APHIS/Animal Care

781-999-1587

From: [Hadjis, Tonya - APHIS](#)
To: [Gladue, Paula S - APHIS](#); [Baltrush, Jan J - APHIS](#)
Subject: RE: Sorry about #592
Date: Thursday, November 7, 2019 11:43:00 AM
Attachments: [AC19-592 Commerfords_TH edits.docm](#)

Hello Jan and Paula,

Please review this one – I updated allegation #2, wording is more clear, as well as allegation #3.
Please let me know of any thoughts.

Thanks

Tonya

From: Gladue, Paula S - APHIS
Sent: Thursday, November 7, 2019 11:12 AM
To: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>; Baltrush, Jan J - APHIS <jan.p.baltrush@usda.gov>
Subject: Re: Sorry about #592

The revised doc has typo in 3rd allegation. Should be “unannounced” inspections not unaccounced.

Otherwise looks good to me.

Thanks Jan.

Paula S. Gladue, VMD
USDA/APHIS/Animal Care

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From: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Sent: Thursday, November 7, 2019 11:00 AM
To: Baltrush, Jan J - APHIS; Gladue, Paula S - APHIS
Subject: RE: Sorry about #592

Thanks Jan.

I’ve added some things to it, in particular the 2nd allegation – which I think the wording is a little awkward. The 3rd allegation, I took that wording from an AC fact sheet, that is still posted on our website but it’s from 2008. I couldn’t find anything else that talked about enforcement on our website.

Please edit away some more.

Thanks again!

Tonya

From: Baltrush, Jan J - APHIS

Sent: Wednesday, November 6, 2019 4:27 PM

To: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>; Gladue, Paula S - APHIS
<paula.s.gladue@usda.gov>

Subject: Sorry about #592

Sorry about that ladies.

Here is the correct response to Complaint 592.

Jan Baltrush

Animal Care Inspector

586 Oronoke Rd

Waterbury, CT 06708

203-757-1765

(b) (5), DPP



USDA-APHIS-Animal Care



ANIMAL WELFARE COMPLAINT			
Complaint No. AC19-592	Date Entered: 27-Sep-19	Processed By: AVB	
Referred To: Baltrush / Hadjis		Reply Due: 29-Oct-19	
Facility or Person Complaint Filed Against			
Name: R W Commerford & Sons		Customer No.: 1940	License No.: 16-C-0006
Address: PO Box 188, Route 4		Email Address: darlenecommerford@msn.com	
City: Goshen	State: CT	Phone No.: (860) 491-3421	
Complainant Information			
Name: Bruce Sherman		Organization: CT Dept. of Agriculture	
Address: 450 Columbus Blvd. Suite 702		Email Address: Bruce.Sherman@ct.gov	
City: Hartford	State: CT	Phone No.: (860) 713-2556	
How was the Complaint received? Email			
Details of Complaint: <u>SEE ATTACHED</u>			
Results: * Complainant was concerned that Beulah was used for rides – Licensee stated that she had not been used for rides in over 2 yrs. * Complainant was concerned that Beulah had to stand on hard concrete for 12 hours a day – The fairgrounds substrate is asphalt. She also had access to the grass and tree lined area that licensee stated Beulah's handler would lead her to those areas whenever Beulah signaled in that direction, indicating that she wanted to go to the grass. * Complainant was wondering why they have not been closed down – The USDA Animal Care has an enforcement process in place to ensure that all licensed facilities comply with the AWA. In order to do that, inspectors conduct unannounced inspections and cite any deficiencies. If deficiencies remain uncorrected at subsequent inspections, APHIS considers legal action.			
Application Kit Provided: Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>			
Inspector:			Date:
Reviewed By:			Date:

From: [Hadjis, Tonya - APHIS](#)
To: [Baltrush, Jan J - APHIS](#); [Gladue, Paula S - APHIS](#)
Subject: RE: Sorry about #592
Date: Thursday, November 7, 2019 11:00:00 AM
Attachments: [Animal Care Prog fact sheet 6-08.pdf](#)
[AC19-592 Commerfords TH edits.docm](#)

Thanks Jan.

I've added some things to it, (b) (5), DPP

(b) (5), DPP

Please edit away some more.

Thanks again!

Tonya

From: Baltrush, Jan J - APHIS
Sent: Wednesday, November 6, 2019 4:27 PM
To: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>; Gladue, Paula S - APHIS <paula.s.gladue@usda.gov>
Subject: Sorry about #592

Sorry about that ladies.

Here is the correct response to Complaint 592.

[Jan Baltrush](#)
[Animal Care Inspector](#)
[586 Oronoke Rd](#)
[Waterbury, CT 06708](#)
[203-757-1765](#)

(b) (5), DPP

The U.S. Department of Agriculture (USDA) enforces the Animal Welfare Act (AWA) to protect certain animals from inhumane treatment and neglect. Congress passed the AWA in 1966 in response to public concern regarding stolen pets used in laboratory research. Since 1966, the AWA has been strengthened several times by amendments. The Animal Care (AC) program of USDA's Animal and Plant Health Inspection Service (APHIS) administers the AWA, its regulations, and standards.

The Law

The AWA requires that minimum standards of care and treatment be provided for certain animals bred for commercial sale, used in research, transported commercially, or exhibited to the public. Individuals who operate facilities using animals in these ways must provide their animals with adequate housing, handling, sanitation, nutrition, water, veterinary care, and protection from extreme weather and temperatures.



The Animal Welfare Act protects warmblooded animals used in specific activities, like this seal on display in a marine-mammals exhibit at the National Zoo.

The Definition of "Animal"

The AWA defines "animal" as any live or dead dog, cat, nonhuman primate, guinea pig, hamster, rabbit, or any warmblooded animal used for research, teaching, testing, experimentation, or exhibition purposes, or as a pet. By definition, coldblooded species (amphibians and reptiles) are exempt from coverage under the AWA. The AWA further excludes the following:

- Birds, rats of the genus *Rattus*, and mice of the genus *Mus*, bred for use in research;
- Horses not used for research purposes;
- Farm animals, including livestock and poultry, used or intended for use as food or fiber or in agricultural research;
- Fish; and
- Invertebrates (crustaceans, insects).

Covered Activity

The AWA requires that all individuals or businesses using animals covered under the law be licensed or registered with AC. Certain activities and businesses are not covered under the AWA: pet stores, retail dog and cat sales, hobby breeders, and private owners of exotic pets. In addition, the AWA prohibits staged dogfights, cock fights, and similar animal-fighting ventures.

Research Facilities

Research facilities are those that use animals for teaching, experimentation, surgery, or testing purposes. Examples of research facilities include hospitals, colleges and universities, and pharmaceutical firms.

The AWA requires researchers to provide anesthesia or pain-relieving medication to minimize the pain or distress caused by an experiment, unless otherwise



Humane care and treatment of research animals are important aspects of the AWA.

scientifically justified. The AWA does not allow AC to prevent the use of animals in research or experimentation, however.

Dealers

People who sell animals bred at their facility (a class "A" licensee) or people who buy and sell animals they did not raise (a class "B" licensee) are both considered dealers under the AWA. Examples of dealers include commercial dog-breeding facilities and exotic animal auctions.

Exhibitors

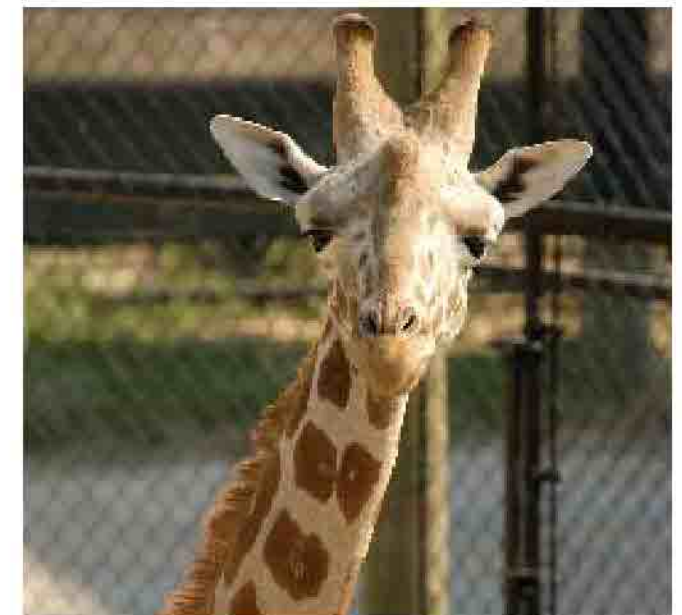
A person or business that displays animals to the public is an exhibitor under the AWA. Examples of exhibitors include zoos, educational displays, circuses, and animal acts.

Transporters

A person with a commercial business that moves animals from one location to another is considered a transporter under the AWA. Examples of transporters include airlines and trucking companies.



Dealers that breed animals for sale to pet stores must be in compliance with AWA regulations.



Exhibitors' facilities, such as zoos, circuses, and aquariums, are all inspected by Animal Care.

AWA Enforcement

AC ensures that all regulated commercial animal dealers, transportation companies, exhibitors, and research facilities are licensed or registered. AC inspectors conduct searches to identify unlicensed or unregistered facilities. Once they have been notified of AWA requirements and standards, these facilities must become licensed or cease conducting regulated activity. Applicants must be in compliance with all standards and regulations under the AWA before AC will issue a license. Upon request, AC personnel will perform preinspection examinations of facilities applying to be licensed or registered.

To ensure that all licensed and registered facilities comply with the AWA, AC personnel make unannounced inspections. If an inspection reveals deficiencies in meeting the AWA standards and these are not corrected promptly, AC may initiate legal action. This could result in animal confiscation, fines, cease-and-desist orders, or license suspensions and revocations.

Public Relations

USDA is committed to its responsibilities and to meeting public expectations in enforcing the AWA. In addition to conducting routine, unannounced



The commercial transport of animals is regulated to ensure careful handling and safe travel.

inspections, AC will perform inspections in response to public concerns about the conditions of regulated facilities. Individuals are also encouraged to inform AC about facilities that should be licensed or registered.

Many State and local governments have passed their own animal welfare legislation. USDA encourages the public to work with State and local officials and local humane organizations as well as Federal officials to help reduce inhumane treatment of animals.

AC seeks to educate the public and create a cooperative relationship with licensed and registered entities, the animal protection community, and other Federal and State agencies. To accomplish this goal, AC conducts workshops regarding minimum care standards as outlined in the AWA. Examples include APHIS' canine care workshops and big cat symposiums.

For more information, contact

USDA-APHIS-Animal Care
4700 River Road, Unit 84
Riverdale, MD 20737-1234
Phone: (301) ~~734-7833~~ 851-3751
Fax: (301) 734-4978
E-mail: ace@aphis.usda.gov
Web site: www.aphis.usda.gov/animal_welfare

USDA-APHIS-Animal Care Eastern Region
920 Main Campus Drive, Suite 200
Raleigh, NC 27606
Phone: (919) 855-7100
Fax: (919) 855-7123

USDA-APHIS-Animal Care Western Region
2150 Centre Avenue
Building B, Mailstop 3W11
Fort Collins, CO 80526-8117
Phone: (970) 494-7478
Fax: (970) 494-7461



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Cover photo: Nonhuman primates in captivity, like this gorilla from the National Zoo in Washington, DC, are protected under the Animal Welfare Act whether they are used for exhibition or research purposes.

Photo credits: The photographs of the cat and the caged rabbits come from APHIS' image library. All the remaining pictures were taken by APHIS photographer R. Anson Eaglin.

Issued May 2006
Slightly revised June 2008



United States Department of Agriculture
Animal and Plant Health Inspection Service

Program Aid No. 1867

The Animal Welfare Act: An Overview





USDA-APHIS-Animal Care



ANIMAL WELFARE COMPLAINT			
Complaint No. AC19-592	Date Entered: 27-Sep-19	Processed By: AVB	
Referred To: Baltrush / Hadjis		Reply Due: 29-Oct-19	
Facility or Person Complaint Filed Against			
Name: R W Commerford & Sons		Customer No.: 1940	License No.: 16-C-0006
Address: PO Box 188, Route 4		Email Address: darlenecommerford@msn.com	
City: Goshen	State: CT	Phone No.: (860) 491-3421	
Complainant Information			
Name: Bruce Sherman		Organization: CT Dept. of Agriculture	
Address: 450 Columbus Blvd. Suite 702		Email Address: Bruce.Sherman@ct.gov	
City: Hartford	State: CT	Phone No.: (860) 713-2556	
How was the Complaint received? Email			
Details of Complaint: <u>SEE ATTACHED</u>			
Results: * Complainant was concerned that Beulah was used for rides – Licensee stated that she had not been used for rides in over 2 yrs. * Complainant was concerned that Beulah had to stand on hard concrete for 12 hours a day – The fairgrounds substrate is asphalt. She also had access to the grass and tree lined area that licensee stated Beulah's handler would lead her to those areas whenever Beulah turned and started in that direction, indicating that she wanted to go to the grass. * Complainant was wondering why they have not been closed down – The USDA Animal Care has an enforcement process in place to ensure that all licensed facilities comply with the AWA. In order to do that, inspectors conduct unannounced inspections. If deficiencies of the AWA are noted, and remain uncorrected, AC may initiate legal action. The legal action could include penalties such as fines, license suspension, and revocations.			
Application Kit Provided: Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>			
Inspector:			Date:
Reviewed By:			Date:

From: [Hadjis, Tonya - APHIS](#)
To: [Gladue, Paula S - APHIS](#); [Baltrush, Jan J - APHIS](#)
Subject: RE: Sorry about #592
Date: Thursday, November 7, 2019 8:39:00 PM
Attachments: [AC19-592 Commerford.docm](#)

Jan.

Could you please sign and I will send to Carolyn to review.

Thanks

Tonya

From: Gladue, Paula S - APHIS
Sent: Thursday, November 7, 2019 4:07 PM
To: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>; Baltrush, Jan J - APHIS <jan.p.baltrush@usda.gov>
Subject: RE: Sorry about #592

Looks OK to me too.

From: Hadjis, Tonya - APHIS
Sent: Thursday, November 7, 2019 12:19 PM
To: Baltrush, Jan J - APHIS <jan.p.baltrush@usda.gov>; Gladue, Paula S - APHIS <paula.s.gladue@usda.gov>
Subject: RE: Sorry about #592

Ok, we should be just about set thanks. We will give Paula a chance to read it and approve.

From: Baltrush, Jan J - APHIS
Sent: Thursday, November 7, 2019 12:05 PM
To: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>; Gladue, Paula S - APHIS <paula.s.gladue@usda.gov>
Subject: Re: Sorry about #592

Looks good.

Jan

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From: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Sent: Thursday, November 7, 2019 11:44:24 AM
To: Gladue, Paula S - APHIS <paula.s.gladue@usda.gov>; Baltrush, Jan J - APHIS <jan.p.baltrush@usda.gov>
Subject: RE: Sorry about #592

Hello Jan and Paula,

Please review this one – I updated allegation #2, wording is more clear, as well as allegation #3.

Please let me know of any thoughts.

Thanks

Tonya

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Sent: Thursday, November 7, 2019 11:12 AM

To: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>; Baltrush, Jan J - APHIS <jan.p.baltrush@usda.gov>

Subject: Re: Sorry about #592

The revised doc has typo in 3rd allegation. Should be (b) (5), DPP

Otherwise looks good to me.

Thanks Jan.

Paula S. Gladue, VMD

USDA/APHIS/Animal Care

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From: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>

Sent: Thursday, November 7, 2019 11:00 AM

To: Baltrush, Jan J - APHIS; Gladue, Paula S - APHIS

Subject: RE: Sorry about #592

Thanks Jan.

I've added some things to it, in particular (b) (5), DPP

(b) (5), DPP

Please edit away some more.

Thanks again!

Tonya

From: Baltrush, Jan J - APHIS

Sent: Wednesday, November 6, 2019 4:27 PM

To: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>; Gladue, Paula S - APHIS
<paula.s.gladue@usda.gov>

Subject: Sorry about #592

Sorry about that ladies.

Here is the correct response to Complaint 592.

Jan Baltrush

Animal Care Inspector

586 Oronoke Rd

Waterbury, CT 06708

203-757-1765

(b) (5), DPP

From: [Gladue, Paula S - APHIS](#)
To: [Baltrush, Jan J - APHIS](#); [Hadjis, Tonya - APHIS](#)
Subject: Re: Commerford's complaint responses
Date: Tuesday, November 5, 2019 10:09:55 PM
Attachments: [AC19-587 Commerfords 10.19.docm](#)
[AC19-592 Commerfords 10.19.docm](#)
[11-5-19 edit.docx](#)

Hi there,

[REDACTED]

[REDACTED]

[REDACTED] ☺

From: Baltrush, Jan J - APHIS
Sent: Monday, November 4, 2019 8:33 PM
To: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>; Gladue, Paula S - APHIS <paula.s.gladue@usda.gov>
Subject: Commerford's complaint responses

Hi Tonya and Paula,

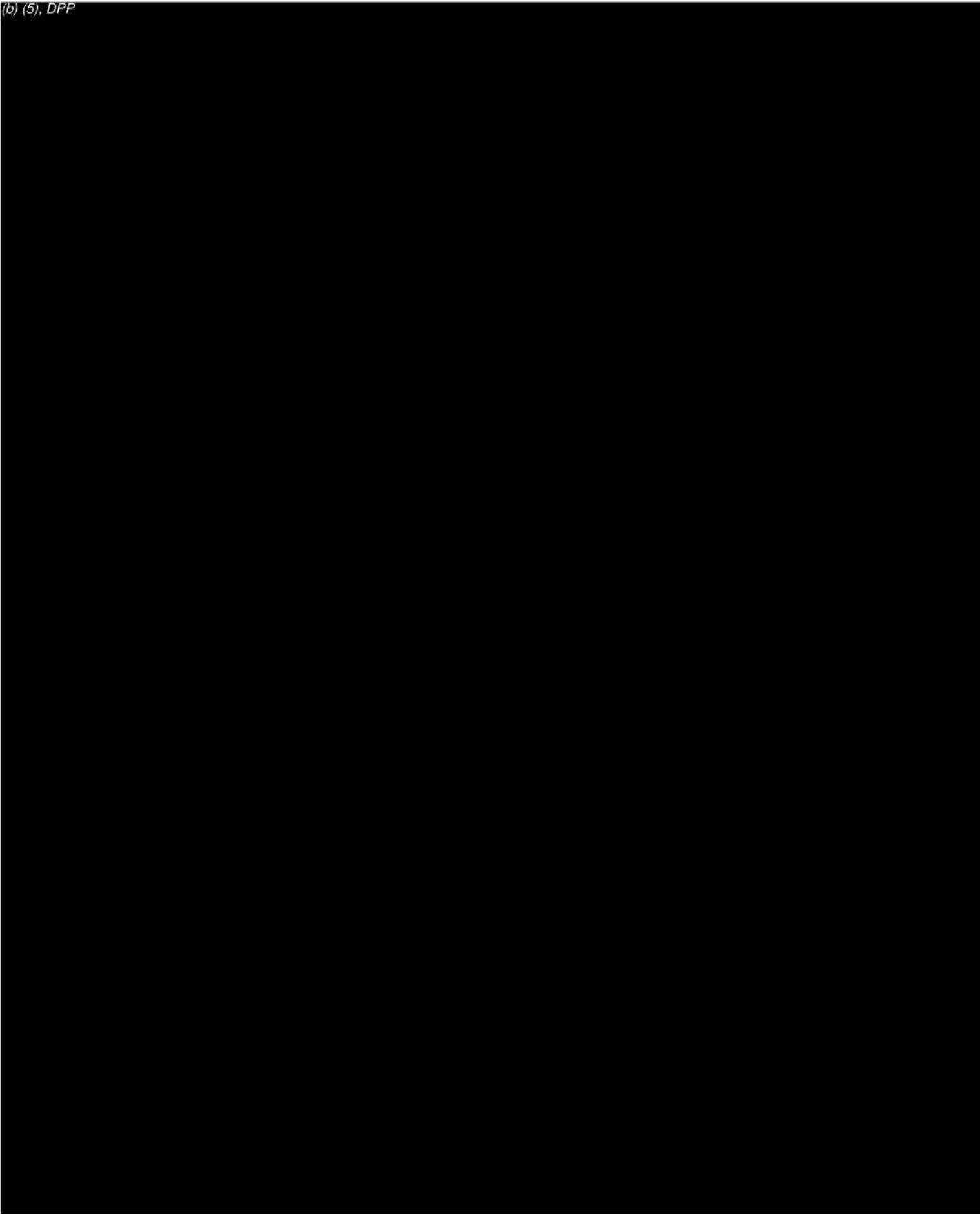
Here are the responses let me know what needs to be reworked.

Jan

Jan Baltrush
Animal Care Inspector
586 Oronoke Rd
Waterbury, CT 06708
203-757-1765
(b) (5), DPP

11/5/19 edit

(b) (5), DPP



From: [Hadijs, Tonya - APHIS](#)
To: [McKinnie, Carolyn - APHIS](#)
Subject: Re: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20
Date: Friday, December 20, 2019 8:41:32 AM

Good morning Carolyn,

(b) (6), (b) (7)(C)

If you're available I'd like to talk about Emirates and I'm waiting for their written corrective actions response.

As far as the necropsy report

(b) (5), DPP

(b) (5), DPP

For q 2.

(b) (5), DPP

For q 5. After the first sentence:

(b) (5), DPP

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From: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>
Sent: Thursday, December 19, 2019 11:24 PM
To: Hadijs, Tonya - APHIS
Subject: FW: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Tonya, I pulled out some of our emails earlier to flesh some of this out. If you are working Friday, please let me know if you think something is missing. I'll be checking my email early tomorrow morning to see if Bob needs anything else.

Thanks, Carolyn

From: McKinnie, Carolyn - APHIS

Sent: Thursday, December 19, 2019 8:11 PM

To: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>; Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>

Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>

Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Hi Bob,

Here's what I have compiled based on input from Paula Gladue, Jan Baltrush and Tonya Hadjis. I've added directly to the questions below.

For additional context if needed, I've attached memo's from Paula Gladue and Jan Baltrush, two recent complaint responses involving the Commerford elephants as well as previous emails responding to questions from Blumenthal's office (via Anne Dunigan).

Jan noted that Blumenthal's letter states that the Commerfords have been licensed since May 2000. This is incorrect as she has been inspecting them since Oct. 1988 and they were licensed prior to that. Based on the Commerford's license # 16-C-0006, she believes that they were the sixth exhibitor to get a license back in 1970.

Please let me know if anything needs to be clarified. I'll check my email first thing tomorrow morning in case you have any other questions.

Thanks, Carolyn

From: Gibbens, Robert - APHIS

Sent: Thursday, December 19, 2019 10:18 AM

To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>; Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>

Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>

Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Great -- here's a start. Thanks.

1. What were the initial and final causes of death for elephants Karen and Beulah?

- (b) (5), DPP [REDACTED]

2. Could those deaths have been prevented? (b) (5), DPP [REDACTED]

(b) (5), DPP

A large rectangular area of the document is completely redacted with black ink. It covers the top half of the page, starting below the header and ending above the first question.


3. What is USDA's role after unexpected exotic animal deaths?

• (b) (5), DPP

A rectangular area of the document is redacted with black ink, covering the answer to question 3.

4. How does USDA ensure that the veterinarian performing the necropsy is qualified and renders an independent opinion?

• (b) (5), DPP

A large rectangular area of the document is redacted with black ink, covering the answer to question 4. It spans most of the width of the page and extends down several lines.

5. Why did Commerford Zoo continue to pass USDA inspections wider AWA despite the premature deaths of two elephants?

• (b) (5), DPP

A rectangular area of the document is redacted with black ink, covering the answer to question 5.

From: McKinnie, Carolyn - APHIS

Sent: Thursday, December 19, 2019 11:14 AM

To: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>; Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>

Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS

<dana.j.cole@usda.gov>

Subject: Re: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Hi Bob, I will work with the inspectors on this today. As an FYI (b) (6), (b) (7)(C) . I am familiar with this as I worked closely with Hadjis on the 2 elephant complaint responses. Carolyn

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From: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>

Sent: Thursday, December 19, 2019 10:04:35 AM

To: Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>

Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>; McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>

Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Never mind about my suggested deadline, just saw we need to forward by 12/20.

From: Gibbens, Robert - APHIS

Sent: Thursday, December 19, 2019 10:58 AM

To: Betty J - APHIS Goldentyer (betty.j.goldentyer@usda.gov) <betty.j.goldentyer@usda.gov>

Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>; Carolyn - APHIS McKinnie (carolyn.j.mckinnie@usda.gov) <carolyn.j.mckinnie@usda.gov>

Subject: FW: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Yes, we'll get answers to the questions from Hadjis/inspector. Do we need 10 years of inspections or 3? The deadline in the letter is January 18; if we get it to Mandi by January 7, would that be okay?

Thanks.

From: Goldentyer, Betty J - APHIS

Sent: Thursday, December 19, 2019 10:40 AM

To: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>

Subject: Fwd: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Bob

Can you get with Katie and start on this. Probably need the inspectors to answer the questions.

Thanks

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From: Frederick, Mandi M - APHIS <mandi.m.frederick@usda.gov>

Sent: Thursday, December 19, 2019 12:04 PM

To: Dunigan, Anne H - APHIS; Needham, Christopher M - APHIS; McNally, Andrea C - APHIS

Cc: Goldberg, Ruth - APHIS; Taylor, Kimberly A - APHIS; Goldentyer, Betty J - APHIS; Anderson, Christa - APHIS

Subject: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Hi all,

I'm attaching a letter that LPA just received from Senator Blumenthal's office about Commerford Zoo in Connecticut. As you'll see, the Senator is concerned about the welfare of animals at the zoo particularly in light of the deaths of 2 elephants. He's asked 5 specific questions and asked for 9 years worth of inspection reports. The Secretary will be signing the response. Could you please read over this letter and provide guidance on how to best respond?

Chris—I'm not sure if we need to answer each of his questions in turn. If it was an oversight letter, I'm sure we would but in this case, do we need to? And if we do need to answer each question—Anne, can AC please provide the input?

RE: Inspection reports—Andrea, can we give these out or would we need to ask the Senator to file a FOIA for them?

Since Secretary Perdue is signing this letter, we need to move it rather quickly so if you could **please get me your input by tomorrow at noon**, that would be great. I should also note that I'm looping in others in LPA b/c I will be on leave next week so someone else is likely to draft or take over this response.

Thank you!

Mandi M. Frederick

Writer/Editor--Executive Communications

Legislative and Public Affairs

APHIS-USDA

4700 River Rd., Unit 49

Riverdale, MD 20737

2A02.30

(301) 851-4095

From: [McKinnie, Carolyn - APHIS](#)
To: [Hadjis, Tonya - APHIS](#)
Subject: Re: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20
Date: Friday, December 20, 2019 10:18:16 AM

Good morning Tonya- so glad you're feeling better. I appreciate you reviewing the questions and your comments. Thanks for reminding me about the histopathology results. I recall now- I guess I was remembering just the gross necropsy. I'll let you know if there are any further requests for information on the Commerfords/elephants.

Re Emirates- since you're not taking the day off, we can discuss. Why don't you give me a call after yours at 12-1 EST.

Talk to you soon! Carolyn

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From: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Sent: Friday, December 20, 2019 5:41 AM
To: McKinnie, Carolyn - APHIS
Subject: Re: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Good morning Carolyn,


(b) (6), (b) (7)(C)

[REDACTED] If you're available I'd like to talk about Emirates and I'm waiting for their written corrective actions response.

As far as the necropsy report (b) (5), DPP
(b) (5), DPP

[REDACTED]

(b) (5), DPP



For q 2.

(b) (5), DPP



For q 5. After the first sentence:

(b) (5), DPP



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From: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>

Sent: Thursday, December 19, 2019 11:24 PM

To: Hadjis, Tonya - APHIS

Subject: FW: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Tonya, I pulled out some of our emails earlier to flesh some of this out. If you are working Friday, please let me know if you think something is missing. I'll be checking my email early tomorrow morning to see if Bob needs anything else.

Thanks, Carolyn

From: McKinnie, Carolyn - APHIS

Sent: Thursday, December 19, 2019 8:11 PM

To: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>; Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>

Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS

<dana.j.cole@usda.gov>

Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Hi Bob,

Here's what I have compiled based on input from Paula Gladue, Jan Baltrush and Tonya Hadjis. I've added directly to the questions below.

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Jan noted that Blumenthal's letter states that the Commerfords have been licensed since May 2000. This is incorrect as she has been inspecting them since Oct. 1988 and they were licensed prior to that. Based on the Commerford's license # 16-C-0006, she believes that they were the sixth exhibitor to get a license back in 1970.

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Sent: Thursday, December 19, 2019 10:18 AM

To: McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>; Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>

Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>

Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

Great -- here's a start. Thanks.

1. What were the initial and final causes of death for elephants Karen and Beulah?

• (b) (5), DPP [REDACTED]
[REDACTED]

2. Could those deaths have been prevented? (b) (5), DPP

[REDACTED]
[REDACTED]
[REDACTED] [REDACTED]

(b) (5), DPP
[Redacted text block]

3. What is USDA's role after unexpected exotic animal deaths?

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Sent: Thursday, December 19, 2019 11:14 AM

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Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>

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Sent: Thursday, December 19, 2019 10:04:35 AM

To: Goldentyer, Betty J - APHIS <betty.j.goldentyer@usda.gov>

Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>; McKinnie, Carolyn - APHIS <carolyn.j.mckinnie@usda.gov>

Subject: RE: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

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Cc: Whisenton, Katie M - APHIS <katie.m.whisenton@usda.gov>; Cole, Dana J - APHIS <dana.j.cole@usda.gov>; Carolyn - APHIS McKinnie (carolyn.j.mckinnie@usda.gov) <carolyn.j.mckinnie@usda.gov>

Subject: FW: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

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From: Goldentyer, Betty J - APHIS

Sent: Thursday, December 19, 2019 10:40 AM

To: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>

Subject: Fwd: RUSH Input Requested for Senator Blumenthal re: Commerford Zoo--PLZ Respond by Noon 12/20

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From: Frederick, Mandi M - APHIS <mandi.m.frederick@usda.gov>

Sent: Thursday, December 19, 2019 12:04 PM

To: Dunigan, Anne H - APHIS; Needham, Christopher M - APHIS; McNally, Andrea C - APHIS

Cc: Goldberg, Ruth - APHIS; Taylor, Kimberly A - APHIS; Goldentyer, Betty J - APHIS; Anderson, Christa - APHIS

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I'm attaching a letter that LPA just received from Senator Blumenthal's office about Commerford Zoo in Connecticut. As you'll see, the Senator is concerned about the welfare of animals at the zoo particularly in light of the deaths of 2 elephants. He's asked 5 specific questions and asked for 9 years worth of inspection reports. The Secretary will be signing the response. Could you please read over this letter and provide guidance on how to best respond?

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Thank you!

Mandi M. Frederick
Writer/Editor--Executive Communications
Legislative and Public Affairs
APHIS-USDA
4700 River Rd., Unit 49
Riverdale, MD 20737
2A02.30
(301) 851-4095

From: [Baltrush, Jan J - APHIS](#)
To: [Hadjis, Tonya - APHIS](#); [Gladue, Paula S - APHIS](#)
Subject: Re: Sorry about #592 - signed
Date: Friday, November 8, 2019 3:27:50 PM
Attachments: [AC19-592 Commerfords.docm](#)

Here is the signed complaint response.

Jan

*Jan Baltrush
Animal Care Inspector
586 Oronoke Rd
Waterbury, CT 06708
203-757-1765*

(b) (5), DPP

From: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>
Sent: Thursday, November 7, 2019 8:39 PM
To: Gladue, Paula S - APHIS <paula.s.gladue@usda.gov>; Baltrush, Jan J - APHIS <jan.p.baltrush@usda.gov>
Subject: RE: Sorry about #592

Jan.

Could you please sign and I will send to Carolyn to review.

Thanks
Tonya

From: Gladue, Paula S - APHIS
Sent: Thursday, November 7, 2019 4:07 PM
To: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>; Baltrush, Jan J - APHIS <jan.p.baltrush@usda.gov>
Subject: RE: Sorry about #592

Looks OK to me too.

From: Hadjis, Tonya - APHIS
Sent: Thursday, November 7, 2019 12:19 PM
To: Baltrush, Jan J - APHIS <jan.p.baltrush@usda.gov>; Gladue, Paula S - APHIS <paula.s.gladue@usda.gov>

Subject: RE: Sorry about #592

Ok, we should be just about set thanks. We will give Paula a chance to read it and approve.

From: Baltrush, Jan J - APHIS

Sent: Thursday, November 7, 2019 12:05 PM

To: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>; Gladue, Paula S - APHIS <paula.s.gladue@usda.gov>

Subject: Re: Sorry about #592

Looks good.

Jan

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From: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>

Sent: Thursday, November 7, 2019 11:44:24 AM

To: Gladue, Paula S - APHIS <paula.s.gladue@usda.gov>; Baltrush, Jan J - APHIS <jan.p.baltrush@usda.gov>

Subject: RE: Sorry about #592

Hello Jan and Paula,

Please review this one – I updated allegation #2, wording is more clear, as well as allegation #3.

Please let me know of any thoughts.

Thanks

Tonya

From: Gladue, Paula S - APHIS

Sent: Thursday, November 7, 2019 11:12 AM

To: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>; Baltrush, Jan J - APHIS <jan.p.baltrush@usda.gov>

Subject: Re: Sorry about #592

The revised doc has typo in 3rd allegation. Should be (b) (5), DPP

Otherwise looks good to me.

Thanks Jan.

Paula S. Gladue, VMD

USDA/APHIS/Animal Care

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From: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>

Sent: Thursday, November 7, 2019 11:00 AM

To: Baltrush, Jan J - APHIS; Gladue, Paula S - APHIS

Subject: RE: Sorry about #592

Thanks Jan.

I've added some things to it, (b) (5), DPP

(b) (5), DPP

Please edit away some more.

Thanks again!

Tonya

From: Baltrush, Jan J - APHIS

Sent: Wednesday, November 6, 2019 4:27 PM

To: Hadjis, Tonya - APHIS <tonya.hadjis@usda.gov>; Gladue, Paula S - APHIS <paula.s.gladue@usda.gov>

Subject: Sorry about #592

Sorry about that ladies.

Here is the correct response to Complaint 592.

Jan Baltrush

Animal Care Inspector

586 Oronoke Rd

Waterbury, CT 06708

203-757-1765

(b) (5), DPP



USDA-APHIS-Animal Care



ANIMAL WELFARE COMPLAINT			
Complaint No. AC19-592	Date Entered: 27-Sep-19	Processed By: AVB	
Referred To: Baltrush / Hadjis		Reply Due: 29-Oct-19	
Facility or Person Complaint Filed Against			
Name: R W Commerford & Sons		Customer No.: 1940	License No.: 16-C-0006
Address: PO Box 188, Route 4		Email Address: darlenecommerford@msn.com	
City: Goshen	State: CT	Phone No.: (860) 491-3421	
Complainant Information			
Name: Bruce Sherman		Organization: CT Dept. of Agriculture	
Address: 450 Columbus Blvd. Suite 702		Email Address: Bruce.Sherman@ct.gov	
City: Hartford	State: CT	Phone No.: (860) 713-2556	
How was the Complaint received? Email			
Details of Complaint: <u>SEE ATTACHED</u>			
Results: * Complainant was concerned that Beulah was used for rides – Licensee stated that she had not been used for rides in over 2 yrs. * Complainant was concerned that Beulah had to stand on hard concrete for 12 hours a day – The fairgrounds substrate is asphalt. She also had access to the grass and tree lined area that licensee stated Beulah's handler would lead her to those areas whenever Beulah signaled in that direction, indicating that she wanted to go to the grass. * Complainant was wondering why they have not been closed down – The USDA Animal Care has an enforcement process in place to ensure that all licensed facilities comply with the AWA. In order to do that, inspectors conduct unannounced inspections and cite any deficiencies. If deficiencies remain uncorrected at subsequent inspections, APHIS considers legal action.			
Application Kit Provided: Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>			
Inspector: Jan Baltrush		Date: 8-Nov-19	
Reviewed By:		Date:	

From: [Baltrush, Jan J - APHIS](#)
To: [Hadjis, Tonya - APHIS](#); [Gladue, Paula S - APHIS](#)
Subject: Sorry about #592
Date: Wednesday, November 6, 2019 4:26:56 PM
Attachments: [AC19-592 Commerfords.docm](#)

Sorry about that ladies.

Here is the correct response to Complaint 592.

*Jan Baltrush
Animal Care Inspector
586 Oronoke Rd
Waterbury, CT 06708
203-757-1765*

(b) (5), DPP



USDA-APHIS-Animal Care



ANIMAL WELFARE COMPLAINT			
Complaint No. AC19-592	Date Entered: 27-Sep-19	Processed By: AVB	
Referred To: Baltrush / Hadjis		Reply Due: 29-Oct-19	
Facility or Person Complaint Filed Against			
Name: R W Commerford & Sons		Customer No.: 1940	License No.: 16-C-0006
Address: PO Box 188, Route 4		Email Address: darlenecommerford@msn.com	
City: Goshen	State: CT	Phone No.: (860) 491-3421	
Complainant Information			
Name: Bruce Sherman		Organization: CT Dept. of Agriculture	
Address: 450 Columbus Blvd. Suite 702		Email Address: Bruce.Sherman@ct.gov	
City: Hartford	State: CT	Phone No.: (860) 713-2556	
How was the Complaint received? Email			
Details of Complaint: SEE ATTACHED			
<p>Results:</p> <p>Complainant was concerned that Beulah was used for rides – She had not been used for rides in over 2 yrs.</p> <p>Complainant was concerned that Beulah had to stand on hard concrete for 12 hours a day – The fairgrounds substrate is asphalt. She also had access the grass and tree lined area whenever she wanted.</p> <p>Complainant was wondering why they have not been closed down – The USDA Animal Care have an enforcement process in place to address the frequency and number of noncompliant items identified during the inspection process.</p>			
Application Kit Provided: Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>			
Inspector:			Date:
Reviewed By:			Date: