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 in 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 access 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 $\frac{1}{2}$ 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, (6), (6), (7) their previous attending vet, (b) (6), (b) and (C) and (C) For the next few days, I was in constant contact with Tim, (b) (6), (b) and Dr. Hadjis.

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

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

(b) (5), DPP

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

(b) (5), DPP