

**Affidavit of** [REDACTED]

[REDACTED] of [REDACTED]  
County of [REDACTED]

[REDACTED], of [REDACTED] County, [REDACTED], personally appeared before me and took an oath that the following is true and correct:

1. My name is [REDACTED]. I am [REDACTED] years old and competent to testify to the matters described in this affidavit. I have personal knowledge of the events described in this affidavit and certify that the information contained herein is true and correct to the best of my knowledge.
2. I was employed by SoulCircus, Inc. ("SCI"), an Atlanta-based corporation that presents the UniverSoul Circus at venues across the United States, intermittently from [REDACTED] until [REDACTED]. [REDACTED]

[REDACTED] While working for SCI, I worked at least 8 hours per day during the week and 11 hours per day on the weekends. Because I frequently worked non-traditional work hours, I became familiar with all of the daily functions of the circus during the day and at night. At all times during my employment with SCI, I was a salaried employee and my paychecks came from SoulCircus, Inc.

3. The attached photographs are a true and accurate depiction of conditions I personally witnessed while working for SCI.
4. Because SCI has not possessed its own USDA license until 2013, it has contracted—and continues to contract—with other USDA-licensed exhibitors to provide animal acts for the UniverSoul Circus. I traveled extensively with the UniverSoul Circus during [REDACTED] and [REDACTED] during which time I became very familiar with the way that the animals are transported, handled, housed, and treated. As part of my job responsibilities as an SCI employee, I had to work with the animal exhibitors that SCI hired [REDACTED]
5. I have a love for animals and because I volunteered for one summer with the AZA-accredited [REDACTED], I have a basic understanding of typical exotic

animal husbandry practices. The treatment of animals—particularly elephants and big cats—that I witnessed during the course of my employment for SCI struck me as highly inappropriate, unnatural, and abusive. At the upper-level management within SCI, I noticed a general disregard for the wellbeing of the animals used for UniverSoul Circus, particularly by SCI CEO Cedric Walker.

6. My concerns about mistreatment and substandard care for animals grew over the years that I worked for SCI until [REDACTED] 2013, when I contacted People for the Ethical Treatment of Animals to report my observations.

#### Elephants

7. Throughout my employment with SCI, USDA-licensed Jorge and Louann Barreda (collectively, “Barredas”) have provided an elephant act for SCI. The Barredas are currently providing three elephants for the UniverSoul Circus: Makia, LouLou, and Lovie. Jorge and Louann Barreda are the primary elephant handlers, although a woman named Amira Diamond also handled elephants for the UniverSoul Circus from time-to-time during the years that I worked for SCI. Unless otherwise noted, all of the details pertaining to elephants contained in this affidavit pertain to elephants provided by the Barredas.
8. While traveling with the UniverSoul Circus, I noticed that the elephants are kept chained by one leg twenty-four hours per day, seven days per week aside from their brief performances. The chains by which the elephants are tethered are approximately 6 feet long. The length of the chains is not long enough for the elephants to turn around or lie down. All of the elephants exhibit constant, repetitive swaying and dramatic head bobbing behavior while they are chained, while they are backstage, and even sometimes during performances.
9. At performance venues, the elephants are kept chained in the performance venue parking lots and are enclosed by temporary fencing that is no more than 4 feet high. I never saw any secondary barrier or perimeter fencing set up around the elephant housing area at any of the performance venues. The elephants are kept chained under a small green canopy that insufficient to provide the elephants with consistent protection from the sun throughout the day.
10. I frequently witnessed the Barredas strike and jab elephants with firepoker-like bullhooks, metal poles, and pieces of plywood, in order to get the elephants to obey. Bullhook use on the elephants is particularly common when the Barredas are re-chaining the elephants following performances. When using bullhooks on the elephants, the Barredas typically target the elephants on their legs, hindquarters, and behind the knees. In my personal observations, I notice that Jorge Barreda typically used the bullhook to strike the elephants with the curved hook and that Louann Barreda typically used the bullhook to jab the elephants with the sharp steel tip.
11. The elephants who are provided for the UniverSoul Circus by the Barredas always have an overpowering, foul, and uncharacteristic odor. When I asked Jorge Barreda why the elephants have such a foul odor, he dismissed me by saying that all elephants smell that way. However, because of my experience working at the [REDACTED] Zoo, I know that an overpowering foul odor is not characteristic of all elephants.

12. During my employment with SCI, I noticed that all three of the elephants had diarrhea about three times a month. Elephants suffering from diarrhea were still forced to perform for the UniverSoul Circus and I saw elephants defecate diarrhea on stage during UniverSoul Circus performances on numerous occasions. It also struck me as odd that I never saw any elephants drinking water or being provided with drinking water at any point during my employment and travel with SCI.
13. In addition to the abusive treatment of elephants that I witnessed, I also noticed hazardous conditions that raised my concerns for the safety of the elephants and the public. Elephants are left unsupervised for long periods of time while chained at performance venues in areas enclosed by no more than a rudimentary temporary fence that is approximately 4 feet high. During the UniverSoul Circus' stint at Washington Park in Chicago, IL from September 18-October 6, 2013, there was a very bad rainstorm that flooded the parking lot where the animals were housed with 18-inches or more of water. As I left the circus premises one night during the storm, I had to wade through water up to my knees. As I walked past the area where the elephants were kept chained, I noticed that they were standing in a flooded area in at least 18 inches of water. While I was wading through the water, the green canopy over the elephants fell down on top of the elephants. Louann Barreda emerged from her trailer to move the canopy, but had no sense of urgency.
14. During the storm in Chicago in October 2013, putrid water containing elephant dung flooded the circus premises, including the areas where the elephants and big cats were housed. Despite the fact that trees were falling during high winds and rain, the circus did not provide any protection for the elephants, who were forced to stand in the flooded parking lot where they were vulnerable to falling trees and powerlines.
15. In the jurisdictions where it is allowed, the Barredas provide elephant rides to the public for \$10/per person, per ride in tax free cash revenue that is split 50/50 between the Barredas and SCI.
16. SCI had contracted with USDA-licensed Hugo Liebel to provide Nosey the elephant for use in the UniverSoul Circus, but abandoned the arrangement in 2013. [REDACTED], an SCI [REDACTED] representative, informed me that Cedric Walker did not want to deal with the ongoing backlash raised by the association with Liebel, who was under close scrutiny for alleged mistreatment of Nosey. Walker had apparently been flooded with up to thousands of e-mails a day expressing concerns for Nosey to the point that Walker had to close his previous e-mail address and establish a new e-mail address.

#### **Big Cats**

17. Since my initial employment with SCI [REDACTED], to my knowledge, USDA-licensed Mitchel Kalmanson ("Kalmanson") has provided big cats for UniverSoul Circus. Kalmanson is currently providing two tigers and one cougar for the UniverSoul Circus. To my knowledge, the big cats have typically been transported—even prior to the time when SCI obtained a USDA license—by an employee of SCI, not by Kalmanson.
18. In previous years, the cats provided by Kalmanson who have been used for the UniverSoul Circus have been handled by a handler named "Chino" or by John

Jairo. To my knowledge, during the 2013 tour, there are no trained or experienced tiger handlers traveling with the circus. Rather, it is the responsibility of the lot crew to feed the cats, transfer cats from cage to cage, and move them around for use in a magic act. There is no single person who is consistently in charge of providing care for the big cats. The handler "Chino" reported to me in a previous year that the tigers are declawed.

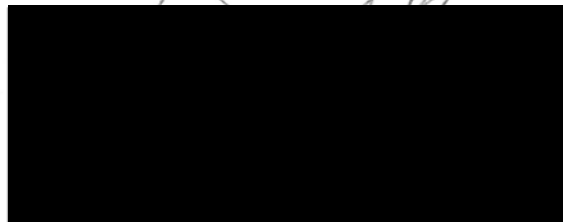
19. For the 2013 UniverSoul Circus tour, the big cats are being used for an illusion magic trick rather than for a tiger "routine." The cats are either compressed down under a false bottom in a small cage (after which they are made to "appear" for the audience) or are compressed into a false rear cage wall (after which they are made to "disappear" for the audience). A third trick requires a cat to be suspended in the air in a small plexiglass box. Each act lasts approximately 10 minutes and, including backstage time, requires the cats to be compressed for about 15 minutes at a time (for two performances a day during the week, and up to three performances a day on weekends).
20. For each magic trick, a female human performer is also compressed into a separate compartment directly above or below the big cats within the false bottom. The female performers have reported that the cats frequently urinate on them while they are compressed in the false bottom. The cats also frequently raise their tails and spray the audience with urine during performances.
21. Based on my personal observations [REDACTED], it is standard practice for Kalmanson and SCI to keep the big cats contained in small cages without ever providing them with access to an exercise pen at any of the performance venues. The big cats are kept in tiny cages—one cat per cage—and appear agitated all the time. The big cats frequently growl and exhibit rapid pacing behavior. The cats are **never provided with access to an exercise pen** or a larger enclosure. The big cats are never allowed outside the confines of the small cages.
22. During the 2011 and 2012 tours, there were 4-6 tigers being used in a more traditional tiger "routine" for UniverSoul Circus. John Jairo handled the tigers and presented the tiger act. During one performance while Jairo was turned towards the audience, a tiger got down off of a pedestal and approached Jairo in a deliberate, crouched, predatory posture. The audience alerted Jairo, who turned around and whipped the tiger into submission until the cat returned to the pedestal.
23. In 2012, while we were in Dallas, Tex. for UniverSoul's summer performances, I saw a tiger vomit in a cage while housed outside in the sweltering Texas heat. In the hot weather, I frequently saw the big cats—who are always housed outside in metal cages—hang their paws outside of the cages or put their paws in their drinking water in what appears to be a desperate attempt to cool off. In the extreme heat, I noted that tigers panted heavily and exhibited extreme lethargy.
24. Also during the 2012 tour, there were two separate incidents involving tiger attacks that resulted in the partial loss of fingers for two SCI employees. During one such incident, a tiger bit the top of the middle finger off of a lot crewmember while he was feeding the cats. During the other incident, a tiger bit the top of the ring finger off of a lot crewmember while he was hosing down the big cat cages. I believe that these two individuals went to the hospital to be treated for their

injuries. SCI is very selective about who is and is not allowed to accompany injured employees for medical attention due to the company desire to maintain discretion and prevent information about animal and non-animal-related circus injuries from becoming public knowledge.

**Other Concerns**

25. In addition to poor treatment of animals and disregard for their living conditions, I noticed that the human performers were subjected to deplorable and frequently unsanitary conditions, including occasions when air conditioning broke while the circus was performing in Dallas, Texas in the summer and the dressing room temperature reached 119 degrees Fahrenheit.
26. The circus premises are filthy and not kept in good repair. The grounds are littered with trash and other hazards that appear unsafe for the human and animal performers. Human and animal performers frequently have to trudge through slippery mud or flooded areas in inclement weather depending on the lot choice by SCI operations.
27. Other conditions that I consistently observed while working for SCI included: rampant sales and use of illicit drugs on site; unsupervised minors running around the circus premises; security officers sleeping on the job; and a general lack of concern for safety and security by the company.
28. While I am concerned about the personal ramifications of coming forward, I know it is the right thing to do because I cannot tolerate seeing the kind of abuse of animals or substandard human working conditions that I witnessed while working for SCI.
29. In October 2013, I reported my observations to People for the Ethical Treatment of Animals.
30. I am not a member or employee of any animal rights organization.

Further affiant sayeth naught.



Sworn to (or affirmed) and subscribed before me this 17<sup>th</sup> day of October, 2013, by

A black rectangular redaction box covering the name of the person sworn to.

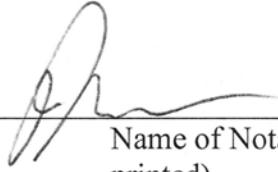
\_\_\_\_\_ Personally Known

\_\_\_\_\_ ☒ Produced Identification

Type and # of Affiant's Identification:

\_\_\_\_\_ A black rectangular redaction box covering the identification information of the affiant.

Signature of Notary



Name of Notary (typed, stamped or  
printed)

Notary Public, [REDACTED]  
[REDACTED]

