

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 standards for the care of animals used in exhibition as established in the federal 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.

January 3, 2020: Following an investigation into the death of Beulah the elephant, the Connecticut Department of Energy & Environmental Protection urged Commerford to stop exhibiting the solitary elephant Minnie if it would adversely affect her health.

September 15, 2019: Asian elephant Beulah died at age 54 from septicemia (blood poisoning) caused by a uterine infection while being exhibited at The Big E fair in West Springfield, Massachusetts.

March 2019: African elephant Karen reportedly died of kidney disease.

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.

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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.

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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.