

April 15, 2026

Bernadette Juarez, J.D.  
Deputy Administrator  
USDA/APHIS/Animal Care

Via e-mail: [REDACTED] [ac.complaints@usda.gov](mailto:ac.complaints@usda.gov)

Re: Request for Investigation of Carson & Barnes Circus for Apparent Violations of the Animal Welfare Act (AWA)

Dear Ms. Juarez,

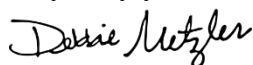
I'm writing on behalf of PETA to request that the U.S. Department of Agriculture (USDA) investigate elephants exhibited by the Carson & Barnes Circus (license no. 73-C-0001), both while on tour and at the circus's home compound known as the Endangered Ark Foundation (EAF). The following apparent AWA violations are detailed in the attached appendix:

- Dr. Chris Draper, an elephant expert who has over 25 years of experience in animal welfare science, visited EAF for its open house on March 14, 2026. I attended the same event, where we observed and documented mishandling and physical abuse of elephants Traci and Whimpy.
- Dr. Draper also observed and documented elephants Viola and Isa at the Jordan World Circus on February 21, 2026, and provided a detailed report describing chronic foot health issues and other serious welfare concerns. (See Exhibit 1.) Eyewitnesses at Jordan World Circus shows on March 7 and March 25, 2026 documented that these apparent violations remain ongoing.

Please promptly inspect all elephants at Carson & Barnes Circus, including those on tour, and ensure that they receive adequate veterinary care from a qualified veterinarian with expertise in elephant medicine and husbandry and are otherwise handled in accordance with the AWA, including insisting that all abusive training tactics are eliminated. Please also hold the licensee and any other responsible parties fully accountable for any violations you discover during your investigation, including referring this matter to the U.S. Department of Justice for prosecution.

Thank you for your attention to this important matter. Please inform me of the complaint number that your agency assigns to this correspondence.

Very truly yours,



Debbie Metzler, M.S.  
Managing Director of Captive Wildlife  
Captive Animal Law Enforcement  
[REDACTED]

PEOPLE FOR  
THE ETHICAL  
TREATMENT  
OF ANIMALS  
FOUNDATION

Washington  
1536 16<sup>th</sup> St. N.W.  
Washington, DC 20036  
202-483-PETA

Los Angeles  
2624 W. Sunset Blvd.  
Los Angeles, CA 90026  
323-644-PETA

Norfolk  
501 Front St.  
Norfolk, VA 23510  
757-622-PETA

PETA FOUNDATION IS AN OPERATING  
NAME OF THE FOUNDATION TO  
SUPPORT ANIMAL PROTECTION.

ENTITIES:

- PETA U.S.
- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Switzerland
- PETA Netherlands
- PETA Foundation (U.K.)

## Appendix

### a. Mishandling and Abuse of Elephants at the Endangered Ark Foundation

On March 14, 2026, I attended an open house event at EAF, accompanied by Dr. Chris Draper, an elephant expert with over 25 years of experience in animal welfare science. Dr. Draper’s credentials can be found on p. 3 of Exhibit 1.

Almost immediately upon our entrance into the event, Dr. Draper and I observed elderly elephants Traci and Whimpy being used for “bathing” encounters, in which guests (including a large number of children) were permitted to scrub one of the elephants on the back with a soapy hand scrub brush. The elephants were made to lie down for this encounter. Traci, however, repeatedly kept trying to stand upright. When one handler was unsuccessful at getting Traci to comply, another handler (Ben Hutchinson) yelled at her from the pen where he was with Whimpy. He stepped away from Whimpy—even while guests were having direct contact with her—to approach and yell at Traci. (*See* Video 1, Video 2, and Video 3.)

Pursuant to 9 C.F.R. § 2.131(c)(1) and (d)(3), “[d]uring public exhibition, any animal must be handled so there is minimal risk of harm to the animal and to the public, with sufficient distance and/or barriers between the animal and the general viewing public so as to assure the safety of animals and the public” and “dangerous animals such as ... elephants must be under the direct control and supervision of a knowledgeable and experienced animal handler.”

This handler’s actions and the lack of adequate public barriers are consistent with a pattern of Carson & Barnes’ trainers failing to pay close attention to elephants when the public is present and allowed to have direct contact with these dangerous wild animals. The licensee has been repeatedly cited and fined for these violations.<sup>1</sup> Further, the USDA has plainly stated that Carson & Barnes’ handlers “must be positioned so that they can immediately intervene should the need arise. The facility must take steps to ensure the safety of all members of the public. Trained handlers must be present at or near the head of each elephant in any type of public contact. This includes feeding, grooming, and photo opportunities.”<sup>2</sup>

When Traci wouldn’t surrender to the senior trainer’s commands to lie down, he eventually came over to use a bullhook to force her to lie down. As he approached her, it became abundantly clear why she had been so desperate to stand, as she defecated very loose stool. (*See* Video 3.) Dr. Draper opined that it did not appear to be a symptom of dietary issues, but more likely was because she had been trying for too long to relieve herself and couldn’t hold back any longer. He also noted that rapid defecation like this can occur in response to fear. Despite the crowd observing this incident and commenting about how that was evidently why she kept trying to stand up, the trainer continued to insist that Traci needed to lie down for the bathing encounters, *even if it meant lying in her own loose feces*. He forcefully jabbed and yanked her with the bullhook, prompting her to rumble (a vocalization that can occur when elephants feel threatened, fearful, or distressed). His repeated jabs, twists, and yanks of the bullhook were clearly intended to cause her pain and get her to obey. Even after Traci had done what she was asked and lied down, the trainer hooked her behind her ear and sharply wrenched on the bullhook. (*See* Video 4.)

---

<sup>1</sup> *See* USDA Citation and Notification of Penalty of \$3,714 (July 26, 2012), to settle several alleged AWA violations including failure to provide adequate distance and/or barriers between the public and the elephants on June 29, 2011, and for failing to maintain direct control of the elephants on August 27, 2010, June 29, 2011, and October 7, 2011; *see also* AWA Docket 15-0103 Consent Decision and Order (May 25, 2016), assessing Carson & Barnes a civil penalty of \$16,000 in part for failing to handle elephants so there is minimal risk of harm to the elephants and the public on April 14, 2014.

<sup>2</sup> *See* USDA Inspection Report, Carson & Barnes Circus, March 22, 2022, for a violation of 9 C.F.R. § 2.131(c)(1) because during public encounters, a trained handler was “too far away to exert direct control over the elephants.”

Forcing an elephant to lie down despite a physiological requirement to stand—and then to further force that animal to lie in her own waste, all while using a weapon to inflict pain and ultimately punish her for not obeying immediately when she couldn't override the need to relieve herself—plainly violates 9 C.F.R. § 2.131(b)(1) and (d)(1), which require that animals must be handled “in a manner that does not cause trauma, ... behavioral stress, physical harm, or unnecessary discomfort” and may only be exhibited “under conditions consistent with their good health and well-being.” Furthermore, the egregious use of the bullhook throughout these encounters clearly violates 9 C.F.R. § 2.131(b)(2)(i), which states that “[p]hysical abuse shall not be used to train, work, or otherwise handle animals.”

Later in the day, we observed and documented additional bathing encounters taking place. The same trainer who had abused Traci earlier was seen forcefully jabbing Wimpy directly in her ear to get her to back up and lie down where he wanted her while public members scrubbed her back. She visibly recoiled from the pain this physical abuse caused. (*See* Video 5.)

### **b. Chronic Health Issues Concerning Elephants on Tour With Jordan World Circus**

Before our visit to EAF, Dr. Draper observed and documented other elephants exhibited by Carson & Barnes at the Jordan World Circus, in Nacogdoches, Texas, on February 21, 2026. (*See* Exhibit 1.) There, he saw elderly elephants Viola and Isa being used for rides and a performance. While giving rides, Viola held her front right leg stiff and dragged it on the ground while walking. (*See* Video 6 and Video 7.)

Dr. Draper said that “she appeared reluctant or unable to bend the right front wrist, shuffling the leg forward without visible flexion.” Wildlife veterinarian Dr. Mason Payne reviewed the footage of Dr. Draper's in-person observations and agreed that when Viola is made to give rides, “there is severe hypoflexion (decreased flexion) of the right wrist, which is leading to a stiff gait appearance.” Dr. Draper observed that during the performance, Viola seemed to bend her wrist more normally, which Dr. Payne opined could potentially be due to a “behavioral component where she overrides pain when performing.” This is not unheard of in elephants used in the circus—indeed, it is common for elephants to have different gait presentations between rides and performances, likely due to the fact that the performance requires them to move faster and they've been conditioned to expect punishment if they don't move quickly. Based on Viola's apparent lameness during rides, Dr. Payne opined that she may be suffering from “arthritis, fractured wrist bone(s), or tendon/ligament injury,” and the issue warrants radiographs and thorough veterinary exam to determine a course of treatment.

Viola's right front limb has bothered her for *years*, as PETA has previously reported this specific debility to the USDA. (*See* complaint nos. AC22-468 and AC25-0011.) This issue remains persistent and apparently untreated—Viola's stiff gait in her right front limb was observed and documented as recently as March 25, 2026, by an eyewitness at the Jordan World Circus in Astoria, Oregon. (*See* Video 8.)

On February 21, Dr. Draper also observed and documented that one of the toenails on Viola's left front foot appeared to have separated at the quick, had dark discoloration, and “visible separation when weightbearing. The cuticle area above appeared swollen.” (*See* Photo 1 below, Video 9, and Video 10.) Dr. Payne opined that large gaps between the nail and cuticle like this are at risk of collecting debris, which can lead to infection. This concern needs to be evaluated and addressed by a qualified veterinarian before it worsens.

Recently, the USDA cited<sup>3</sup> elephant exhibitor Brett Carden for failing to provide adequate veterinary care to an elephant named Betty, who was suffering from a similar gait abnormality in which one front limb was held stiff while walking. The licensee was fully aware of her condition and was still forcing her to give rides.

It is unlikely that Carson & Barnes is unaware of Viola's chronic gait abnormality that is so plainly visible, and yet the circus is still forcing her to carry the weight of 4 to 9 humans at once on a near-daily basis. This burden will only exacerbate her foot and joint issues. Last year, Viola was forced to perform at roughly 200 shows and was on the road for most of the year. It's expected she will have a similar grueling schedule this year, where she's subjected to the harsh conditions of circus life: nearly constant travel in a trailer with no relief from unyielding metal surfaces, confinement to hard substrates outside venues in parking lots or arena backrooms, made to walk in tight circles while carrying riders, and coerced to do tricks that are difficult for any elephant to perform but *especially* an elderly elephant who already has signs of chronic foot and joint issues. Please inspect Viola and her veterinary records in accordance with 9 C.F.R. § 2.40, and as you investigate these concerns, please consider that Carson & Barnes has previously forced elephants with stiffness or limited joint flexion to perform and give rides<sup>4</sup> and has a history of failing to provide adequate foot and nail care to elephants.<sup>5</sup>

### **c. Excessive Bullhook Use on Viola During Elephant Rides**

On February 21, Dr. Draper observed and documented that the man controlling Viola during rides, Armando Loyal, was using the bullhook nearly continuously to keep Viola moving in a tight circle. (*See* Video 7 and Video 9.) Though he didn't observe Loyal exert significant force during these rides, he felt the frequency of direct bodily contact with the weapon was notable.

On March 7, 2026, an eyewitness at the Jordan World Circus in Safford, Arizona, documented Loyal aggressively hook Viola on the leg, apparently just as she finished urinating, to get her to move forward. (*See* Video 11.) Viola jerked her leg quickly in response, indicating that the pain she felt with this action was considerable. This is another apparent violation of 9 C.F.R. § 2.131(b)(1) and (b)(2)(i).

As you investigate this concern, please keep in mind that Carson & Barnes has previously been cited for excessive bullhook use on Viola.<sup>6</sup> Please ensure that no physical abuse is used to coerce animals into performing, giving rides, or being used for public direct contact encounters.

---

<sup>3</sup> *See* USDA Inspection Report, Brett Carden, license no. 43-C-0270, September 29, 2025. Notably, the exhibitor knew that Betty had increased stiffness when she gave rides, but claimed that she "warms out of it." This is an example of exhibitors claiming there's no foot or limb issue so long as they are more mobile when they're coerced to be used for shows—ignoring clear signs of pain and discomfort the elephants exhibit when they are carrying the weight of several riders.

<sup>4</sup> *See* USDA Inspection Report, Carson & Barnes Circus, January 5, 2015, which stated that Rosie and Opal had "stiffness/arthritis" but there was no documentation of a veterinarian's assessment or prescribed treatment of their condition; *see also* USDA Inspection Report, July 2, 2016, which stated that Bunny had "limited range of motion in her right front limb... suggestive of some underlying problem that may be causing discomfort." The exhibitor had reportedly not noticed the abnormality and therefore had not consulted a veterinarian regarding the concern.

<sup>5</sup> *See* USDA Inspection Report, Carson & Barnes Circus, June 6, 2007, citing the exhibitor for inadequate foot care for Becky, who had cracked nails on three feet; Lisa, who had cracked nails on two feet; and Traci, whose nails were trimmed unevenly, creating problems for the weight distribution on her feet and limbs. Becky and Traci had foot problems a year before this, when Carson & Barnes was cited on June 16, 2006 for multiple cracked nails found on those two elephants. Becky's foot care issues extended even farther back, when Carson & Barnes was cited on February 5, 2003, for cracked nails on Becky and Suzy.

<sup>6</sup> *See* USDA Inspection Report, Carson & Barnes Circus, June 29, 2011, which stated that Viola's handler "was using excessive force while tugging at the elephant with the ankus [a.k.a. bullhook]."



Photo 1: A toenail on Viola's left front foot appeared to have separated at the quick, had dark discoloration, and visible separation when weightbearing. The cuticle area above appeared swollen. (February 21, 2026)