

*The Nation's First  
Elephant Sanctuary*



**PAWS**  
PERFORMING ANIMAL  
WELFARE SOCIETY

Founded in 1984  
PROTECTION  
EDUCATION  
ADVOCACY  
SANCTUARY  
pawsweb.org

August 5, 2013

Paul Grayson, Chair  
AZA Ethics Board  
c/o Association of Zoos and Aquariums  
8403 Colesville Rd., Suite 710  
Silver Spring, MD 20910-3314

Dear Mr. Grayson,

Please consider this letter a formal complaint regarding the Association of Zoos and Aquariums (AZA) Certified Related Facility, Have Trunk Will Travel.

According to the AZA's Mandatory Standards under the Code of Professional Ethics, a member shall "issue no statement to the public which he/she knows (or should know) to be false or misleading" (II.3(d)), "shall not violate a Mandatory Standard" (II.2(a)), and "shall not solicit the aid of another individual to circumvent, or assist another to violate, a Mandatory Standard" (II.2(b)).

The Performing Animal Welfare Society (PAWS) contends that Have Trunk Will Travel has willfully violated these standards by issuing statements to the public that they know (or should know) to be false and misleading about PAWS. These violations can be found in a press release dated July 12, 2013, and also in on-line comments by the hired publicist for Have Trunk Will Travel, Paul O'Sullivan, dated July 10, 2013.

**The following statements made by Have Trunk Will Travel and Mr. O'Sullivan are false and misleading, and constitute a violation of the above stated Mandatory Standards:**

1. **Have Trunk Will Travel press release** – "Have Trunk Will Travel Demands Animal Defenders International Release Unedited Video To The Public, Calls on PAWS To Close Facilities To Public Until Declared Safe By Certified Exotic Animal Professionals," July 12, 2013; Retrieved from <http://new.pitchengine.com/pitches/9c95b737-4614-429e-a784-52e259466670>

In this release, Have Trunk Will Travel falsely claims:

**"Unlike HTWT, however, PAWS ... refuses to implement the rigorous safety requirements used by real zoos, aquariums and animal theme parks throughout the United States."**

**"It is unconscionable that PAWS can't or won't follow the simple, broadly-accepted safety procedures and protocols scrupulously followed by HTWT as required by the AZA. Thumbing their nose at these basic safety requirements even though they display lethally dangerous predators like lions, tigers, and bears, PAWS callously places the public at risk... Until they are certified by the AZA or an organization with AZA-level safety protocols, they owe it to the public to close their facilities to visitors," states O'Sullivan.**



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**2. False and misleading on-line statements made by Mr. O’Sullivan, who works for and speaks on behalf of Have Trunk Will Travel, dated July 10, 2013** (violation of Section II.2(b)). Retrieved from <http://yubanet.com/regional/Nevada-County-Fair-Lacks-Sufficient-Safety-Precautions-For-Elephant-Rides.php#.UfCQ81MhzR1>:

“This is a false and misleading statement by PAWS ***which has no experience - not one minute - with training elephants or guiding them in public...***

“... PAWS does not qualify for AZA membership and does not comply with the stringent safety protocols followed by HTWT. Given this, ***we can only conclude that they needlessly place the public at risk...***

### PAWS’ Response

Have Trunk Will Travel comes perilously close to libel when it states in a press release and in on-line comments that PAWS ignores “basic safety requirements” and knowingly puts the public at risk. The company provides no evidence to support these fallacious statements, and, in fact, our unblemished safety record speaks for itself.

PAWS strictly adheres to all local, state and federal standards related to animal care and human safety. Like AZA-accredited zoos, PAWS is licensed and regularly inspected by the U.S. Department of Agriculture (USDA). We are also licensed and regularly inspected by the California Department of Fish & Wildlife (CDFW), and we have earned an excellent reputation with local, state and federal regulatory agencies. PAWS has provided permanent homes for numerous animals confiscated by the USDA and CDFW, and elephants retired from AZA-accredited zoos. PAWS is accredited by the Global Federation of Animal Sanctuaries and complies with its standards for safety and security. This is all public information of which Have Trunk Will Travel would be fully aware.

All of the elephants at PAWS are managed in protected contact, providing a safer work environment for keepers. We share with the AZA its concern for the safety of employees working with elephants and applaud the *Maximizing Occupational Safety of Elephant Care Professionals At AZA-accredited and AZA-certified Facilities* policy. Hopefully, all members will honor and adhere to the letter and the spirit of this policy.

Contrary to Mr. O’Sullivan’s absurd statement, PAWS has extensive experience in training elephants. Our elephants are trained to cooperate with foot care, blood collection, trunk washes, physical examinations, and a variety of husbandry behaviors. Keepers interact with the elephants daily, using positive reinforcement training.

As Have Trunk Will Travel is well aware, PAWS is not a zoo or an animal theme park. With the exception of a strict, limited number of planned educational events each year, PAWS’ facilities are not open to the public. Our sanctuaries are designed to meet the animals’ needs and to provide them with the most natural, intrusion-free lives possible, while keeping both staff and visitors safe.

**At no time are members of the public at any PAWS event allowed to come into contact with the elephants or any other animals at our facilities** – this is common knowledge and would be known to Have Trunk Will Travel. The PAWS website clearly states that at special educational events, such as the “Seeing the Elephant” weekend, visitors will see elephants and other animals but “there is no touching and all guests must stay a safe distance back.” PAWS’ staff accompany all visitors, who are never left unattended.

In fact, PAWS is concerned that the AZA has weakened its position on public safety relative to elephants. Historically, the *AZA Standards for Elephant Management and Care* strongly encouraged members to discontinue public elephant rides and strongly discouraged visitor-elephant interactions outside of the

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primary enclosure, **“in the interest of public safety”** (*AZA Standards for Elephant Management and Care*, Adopted 21 March 2001, Updated 5 May 2003, Section 5.4.3). It is disturbing that the current standards no longer discourage elephant rides or walking elephants in public areas, given the fact that the risk remains unchanged for the public. As regards rides, to the best of our knowledge, no AZA-accredited zoo currently offers elephant rides, and Have Trunk Will Travel is the only AZA-Certified Related Facility to do so. It is confounding that the AZA would diminish its safety standard for one member facility engaged in an activity long considered a risk to public safety.

This is not the first time that Have Trunk Will Travel has attracted unfavorable attention to itself and to the AZA, whose banner the company raises whenever it is facing public opposition and criticism.

In 2006, Have Trunk Will Travel drew media attention and public criticism for having full-body painted the elephant Tai to match a wallpaper background in a notorious art show in Los Angeles. In a November 14, 2006 memo referencing the incident, Beth Stevens, AZA Animal Welfare Committee (AWC) Board Liaison, wrote:

“...However, this incident has resulted in negative publicity for them and for AZA and AZA institutions at a time when AZA institutions have spent the past 2 years increasing their commitment to elephants and to elephant conservation and this was very unfortunate. [Kris] asked her to be more sensitive in the future.”

In 2008, the Discovery Science Center in Santa Ana cancelled a sideshow stunt that involved encasing Tai in a giant soap bubble, after receiving thousands of complaints from the public.

In 2011, Animal Defenders International released an undercover video captured six years earlier that garnered national attention – and continues to be aired by the media today. It shows Kari Johnson and staff repeatedly striking elephants with bullhooks and using an electric shock device on one elephant while training her to perform a trick.

Just last week, Have Trunk Will Travel posted the following image to its Facebook page, further evidence that the company does not represent elephants in a manner conducive to promoting the conservation of endangered Asian elephants. (Photo retrieved from <https://www.facebook.com/HaveTrunkWillTravel>.)



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PAWS does not take this complaint lightly, and we urge the AZA Ethics Board to seriously scrutinize the actions of Have Trunk Will Travel, now and in the past, while considering this claim. While Have Trunk Will Travel may have a strong history with the AZA, we hope that the Ethics Board will take into consideration the continued deleterious effect that this for-profit business has on the image of the AZA and on its conservation message. Surely, using elephants as carnival rides and portraying them in human clothing sends the wrong message to the public about how we treat an endangered species.

Have Trunk Will Travel has been irresponsible, unprofessional and unethical in issuing statements to the public about PAWS that it knows, or should know, are blatantly false and misleading. The company clearly has violated the Mandatory Standards cited in this letter.

PAWS is proud of the safe operation of our sanctuaries, and we take it very seriously when someone accuses us, in a public forum, of ignoring "basic safety requirements" and putting the public at risk. We trust that the Ethics Board will take this complaint just as seriously when it considers what action to take against Have Trunk Will Travel.

I look forward to your response.

Sincerely,



Ed Stewart  
President and Co-founder, PAWS

cc: Jim Maddy, AZA President and CEO  
Tom Schmid, Chair, AZA Board of Directors (Texas State Aquarium)

Tim Snyder, Vice Chair, AZA Ethics Board (Brookfield Zoo)  
Paula Schaedlich, AZA Ethics Board Advisor (National Aquarium in Baltimore)  
Pat Simmons, AZA Ethics Board Liaison (Akron Zoo)  
Kris Vehrs, AZA Executive Director and Staff Liaison to the Ethics Board

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Doug Warmolts, Columbus Zoo and Aquarium