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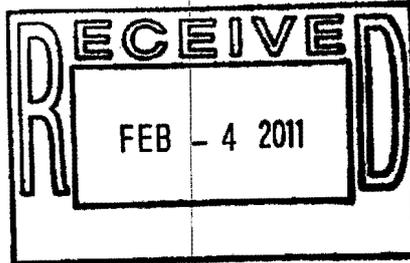
Animal Defenders International

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www.adiusa.org usa@ad-international.org

February 4, 2011

Ms Woods  
APHIS FOIA Director  
Legislative and Public Affairs  
Freedom of Information Act  
4700 River Road  
Unit 50  
Riverdale  
MD 20737



e-mail: foia.officer@aphis.usda.gov

MAR 7 - 2011

**Sent via e-mail**

Dear Ms Woods

**FOIA REQUEST**

On behalf of Animal Defenders International, United States of America ("ADI USA"), I hereby make this request for records under the federal Freedom of Information Act ("FOIA" or "Act"), 5 United States Code ("U.S.C.") section 552.

This request satisfies the written request requirement pursuant 43 Code of Federal Regulations ("C.F.R.") section 2.7(a). If you are not the appropriate official(s) to handle this request, please forward this letter to the appropriate person and telephone me immediately to let me know that you have done so.

ADI USA is a nonprofit animal protection organization headquartered in Los Angeles, California, dedicated to educating the public about issues concerning animal protection. ADI USA has at least 2600 general supporters, 160 of which are financial supporters.

**INFORMATION REQUESTED**

**This request is for** the following records from the United States Department of Agriculture and/or the Animal and Plant Health Inspection service ("USDA" or "APHIS"), including the headquarters and applicable field offices, *see*, 43 C.F.R. § 2.10(b)(2), (3), pursuant to FOIA:

1. *Any and all records, including but not limited to correspondence, memoranda, e-mails, reports, and studies concerning the animal inventory data for the following circuses for the years 2008, 2009 and 2010. These to include;*
  - a. *Ringling Bros. and Barnum & Bailey*
  - b. *Bailey Brothers Circus*
  - c. *Clyde Beatty Cole Brothers Circus (now known as Cole Bros. Circus)*

d. Shrine Circus

e. Circus Royale

f. UniverSoul Circus

g. Sterling & Reid (aka Toby Tyler Circus)

h. Hanneford Circus

i. Carson & Barnes Circus

j. Bentley Bros. Circus (aka Wambold's Circus Menagerie)

k. Circus Gatti

l. Circus Pages

m. Culpepper & Merriweather Circus

n. Franzen Bros. Circus

o. George Carden Circus International

p. Hawthorn Corporation

q. Hendrick Bros. Circus

r. Kelly Miller Circus

s. Liebel Family Circus

t. Tarzan Zerbini Circus

ADI USA is not requesting "trade secrets and commercial or financial information obtained from a person and privileged or confidential," or any other information exempted pursuant to 5 United States Code ("U.S.C."), section 552(b) or 43 C.F.R. section 2.7(b) and Part 2 Appendix E. FOIA requires release of records unless they are "specifically" exempted. 5 U.S.C. § 552(d). Even if an exemption applies, "[a]ny reasonably segregable portion of a record shall be provided . . ." *Id.* at § 552(b) (emphasis added); *see, also*, 43 C.F.R. § 2.21(c). In fact,

*[i]t is [the Department of the Interior's] policy to make records of the Department available to the public consistent with the spirit of the FOIA...*

43 C.F.R. at § 2.2. Accordingly, ADI USA expects the records to be made "promptly available," as required by law. 5 U.S.C. § 552(a)(3)(A).

ADI USA requests expedited processing for this request and satisfies the requirements for waiver of fees.

### **I. ADI and ADI USA**

ADI USA is the United States affiliate of Animal Defenders International ("ADI"), which is a major international campaigning group founded in 1990. ADI has several regional offices around the world, London, UK, Los Angeles, and a South America coordinating office in Bogota, Colombia. We have a database of nearly 30,000 supporters. ADI's mission is to investigate, research and provide information and educational materials for the public, for students, as well as technical briefings for governments on a range of animal protection issues, including animals in traveling circuses, animal welfare, worldwide traffic in endangered species, wildlife conservation, and the environment.

ADI scientific and legal staff research key issues on the commercial use of animals, and we produce well-researched, scientifically-based studies to inform the debate. These reports are combined with empirical evidence produced from our detailed investigations and field work. This information is presented to legislators, governments, media and public.

ADI rescues animals in distress worldwide, and where possible relocates them to their range states, or if this is not possible, to other places of safety. In May of 2010, ADI relocated four lions from Bolivia to a performing animal sanctuary in California. ADI also lobbies at the Convention on International Trade in Endangered Species of Wild Fauna and Flora ("CITES"), using information gathered through investigations and campaigns to help gain CITES protections for animals on an



"Jessamy Korotoga"  
 <JessamyKorotoga@ad-inter  
 national.org>  
 02/04/2011 02:11 PM

To <foia.officer@aphis.usda.gov>  
 cc  
 bcc

Subject FOIA from Animal Defenders International

*Debbie  
 AC  
 Independent*

1 attachment



ADI FOIA APHIS Request Circus Animals JK-additional.doc

Dear Ms Woods

Please find attached an FOIA on behalf of Animal Defenders International. This pertains to the number of circus animals in specific circuses.

I look forward to hearing from you in due course. Please do not hesitate to call me if you should require any clarification.

Yours sincerely

Jessamy Korotoga  
 Research Director

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[www.stopcircussuffering.org](http://www.stopcircussuffering.org)  
[www.ad-international.org](http://www.ad-international.org)  
[www.YouTube.com/AnimalDefenders](http://www.YouTube.com/AnimalDefenders)  
 Fur Stop: Fur their Sake Make it Fake  
<http://furstop.com>

Fur is an unethical product. Designers who use it, and those who wear it, must take responsibility for the way it is produced.

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