



United States  
Department of  
Agriculture

Animal and  
Plant Health  
Inspection  
Service

March 30, 2011

Legislative and  
Public Affairs

Freedom of  
Information

4700 River Road  
Unit 50  
Riverdale, MD  
20737-1232

Jessamy Korotoga  
Animal Defenders International  
Millbank Tower  
Millbank  
London SW1P 4QP, UK

Dear Ms. Korotoga:

This is in further response to your March 11, 2011, e-mail for clarification of our March 9, 2011, response to your request (FOIA 11-238). In response to your questions, we consulted with Animal Care (AC) and have been advised that:

- 1) Regarding the missing circuses, AC re-checked their database for all of them. Although they still do not appear, AC has sent records for Gatti Productions Inc, (10 additional pages) which we have enclosed. These records are appropriate for release in their entirety, without redaction. AC has not found any information on the other circuses (Bailey Brothers Circus, Shrine Circus, Circus Royal, Bentley Brothers Circus, and Hendrick Brothers Circus). They may use animals loaned from other facilities, and thus not need a license. Or they may be operating without a license. AC suggests that you provide us more information about location, details, names of owner, legal or other names, if you would like another search performed. All of our licensed facilities are listed on the Licensing and Registration Search Database. (We provided this link to you in our original letter of response) If you believe a facility is operating without a license illegally, you may file a complaint with the appropriate region and AC will check it out.
- 2) Inventory is taken by Animal Care Inspectors (ACI) during a USDA inspection (which, depending on factors, happens anywhere from once to several times a year). The ACI counts the animals he/she sees during the inspection. This does not always include all regulated animals (animals may not be at that particular site for various reasons and sometimes inspections are focused on specific areas of a site, so the ACI would not count animals he/she does not actually see). Each inventory count only reflects the animals seen by



**APHIS** Safeguarding American Agriculture  
APHIS is an agency of USDA's Marketing and Regulatory Programs

An Equal Opportunity Provider and Employer

the ACI during that particular site inspection. There is no requirement that Animal Care be updated by facilities as to the acquisition/disposition of animals between inspections. Exhibitors are required to keep records of animals on hand (as well as acquisition/disposition records), which are reviewed by the ACI during the inspection, but that information is not taken by the ACI and Animal Care and/or APHIS do not typically make or keep copies of those records (thus they cannot be gotten through FOIA).

- 3) The number of animals at an inspection may vary for a number of reasons: animal deaths, animals loaned out, animals bought and sold, animals shifted between multiple sites of the same licensee, animals not seen during a focused inspection.

If you have any questions, please contact Ms. Deborah L. Leilich of my staff at (301) 734-3623.

Sincerely,



*for* Deborah L. Leilich

Tonya G. Woods  
Director  
Freedom of Information & Privacy Act Staff  
Legislative and Public Affairs

Enclosures