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Mr. Thomas Vilsack  
Secretary of Agriculture  
U.S. Department of Agriculture  
1400 Independence Avenue, S.W.  
Washington, DC 20250, USA

**Dear Mr. Thomas Vilsack,**

I am Director of ElephantVoices and a member and Trustee of the Amboseli Elephant Research Project, the longest study of elephants on earth. I have studied elephants and worked for their conservation and welfare for 36 years and am writing to you as a world expert on their behavior and communication. I am often called upon to offer expert testimony in situations where the interests of elephants are called into question. I write to you now with respect to Queenie, who I argue should be sent to a place that can provide her with the conditions an elephant needs to thrive.

The USDA is the primary Federal agency responsible for enforcing the Animal Welfare Act, which is intended to protect animals from inhumane treatment and neglect. In the public eye the USDA has a poor reputation with respect to elephants. Queenie's case would seem to have been obvious for the USDA: A choice between sending this confiscated elephant, who has suffered a life of abuse, to an institution set up specifically to care for and rehabilitate such individuals, or to the San Antonio Zoo, considered to be among the worst zoos for elephants in the United States. Indeed, there are numerous complaints to the USDA regarding the treatment of elephants in this zoo. Queenie is welcome at PAWS, which would provide her with space to roam in a natural setting with a group of companions. San Antonio Zoo can offer her only a cramped enclosure, noise from throngs of people, and one neurotic companion with the dubious name of "Lucky", an animal whose welfare experts have, for years, tried to move to a sanctuary.

I am aware that Wilbur Davenport had agreed that Queenie should go to PAWS when the USDA intervened. From my perspective, in the USDA-led negotiations that followed, Queenie's welfare was not prioritized and the USDA failed in its mandate. It would seem that either 1) the USDA does not have adequate knowledge or expertise in the behavior and interests of elephants to take the correct decision, or, 2) the USDA has bowed to political pressure from the American Zoological Association (AZA) to send confiscated circus elephants to one of their own institutions rather than to PAWS or The Elephant Sanctuary. Either way, while political and economic gains of individuals and institutions might be met as a result of this decision, Queenie's needs won't be.

I urge the USDA and your office to reverse the decision and send Queenie to PAWS without further delay. I would be pleased to discuss the reasons for my perspective with your office if that is helpful to the process.

Respectfully,

Joyce H. Poole  
Director, ElephantVoices ([www.elephantvoices.org](http://www.elephantvoices.org))