



NONHUMAN RIGHTS PROJECT

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

Freedom of Information Act Request

Dear Ms. Woods:

On behalf of the Nonhuman Rights Project (“NhRP”), I am requesting records under the Federal Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, *et seq.*

A. Records Request

This request is for records on or related to any and all Asian elephants (*Elephas maximus*) and African elephants (*Loxodonta africana*) owned by or in the possession of R.W. Commerford & Sons Inc., a USDA-licensed exhibitor under the Animal Welfare Act.

Specifically, the NhRP requests:

- (1) Any and all records concerning Asian and African elephants owned by or in the possession of R.W. Commerford & Sons Inc, including, but not limited to, APHIS site inspection reports, photos, incident reports, reports or notifications of the death of an elephant, or any other record from the time period of January 2018 to date.

For this request, the term “records” refers to, but is not limited to, correspondence of any kind, memoranda, letters, electronic mail, photos, work papers, reports, or data. If any information is being withheld, please identify all such information and provide all information required under 7 C.F.R. § 1.7.

B. Statutory Fee Waiver Request

Under federal law, records are to be furnished completely without charge when “disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations and activities of government and is not in the commercial interest of the requestor.” 5 U.S.C. § 552(a)(4)(A)(iii). Pursuant to this requirement, the NhRP seeks a waiver of any search and copy fees for this FOIA request.

C. Conclusion

For the aforementioned reasons the NhRP seeks the requested records and asks that any search and copy fees to be waived or reduced.

Sincerely,

A handwritten signature in black ink that reads "Courtney Fern". The signature is written in a cursive, flowing style.

Courtney Fern
Director of Government Relations and Campaigns
Nonhuman Rights Project
cfern@nonhumanrights.org