

September 9, 2021

Governor Ned Lamont
State Capitol
210 Capitol Avenue
Hartford, CT 06106

RE: Request for action in response to urgent welfare concerns about an elephant owned by R.W. Commerford & Sons Inc. d/b/a/ the Commerford Zoo

Dear Governor Lamont:

On behalf of the undersigned organizations and our supporters, we are writing to express our deep concern about the welfare of Minnie, a 49-year-old Asian elephant owned by the Commerford Zoo, a traveling circus based in Goshen. We urge you to take action to ensure her safety and publicly call for her transfer to one of the two accredited elephant sanctuaries in the United States: The Performing Animal Welfare Society (“PAWS”) or The Elephant Sanctuary in Tennessee (“TES”).

Almost two years ago we wrote to you about our urgent concerns regarding Minnie in the wake of the deaths of her two elephant companions, Beulah and Karen, following decades of exploitation by the Commerford Zoo.¹ Since then, we have learned alarming new details about Beulah, Karen, and Minnie’s lives and the bleak existence Minnie now faces.

In July, *National Geographic* published a feature story on how Beulah and Karen suffered for years before their deaths in 2019.² Records obtained from the United States Department of Agriculture (“USDA”) detail the extent of Karen and Beulah’s illnesses and reveal that—for years longer than was previously known—the Commerford Zoo continued to compel them to labor at fairs and other events across the northeast while knowing they were sick.³ A December 2019 intra-agency memo drafted by Jan Baltrush, the USDA inspector who has been the designated inspector for the Commerford Zoo since 1988, stated that at the time of her death,⁴ Beulah had an approximate “10 [year] history of occasional blood and mucopurulent discharge in her urine. Uterine tumors were suspected.”⁵

¹ <https://www.nonhumanrights.org/content/uploads/Letter-regarding-the-Commerford-Zoo-1.pdf>

² Rachel Fobar, *Roadside zoo elephants suffered for years before dying, new records reveal*, National Geographic (July 13, 2021), <https://www.nationalgeographic.com/animals/article/new-records-reveal-suffering-of-roadside-zoo-elephants-in-the-united-states>.

³ https://www.nonhumanrights.org/content/uploads/2020-APHIS-01597-F-1_Redacted.pdf

⁴ In September 2019, Beulah collapsed and died at the Big E fair in Massachusetts after being transported there by the Commerford Zoo and forced to pose for photos with fairgoers.

⁵ <https://www.nonhumanrights.org/content/uploads/APHIS-Commerford-Memo.pdf>

What this means is that, during the decade Beulah suffered from suspected uterine tumors and related issues, the Commerford Zoo continued to force her into cramped trailers and transport her across the northeast for their financial gain.⁶ Likewise, Karen had been suffering from suspected kidney disease for the year prior to her death. Blood tests revealed that her creatine levels were high for an elephant. When she died in March 2019, neither the USDA nor any state agency with oversight authority required a necropsy. According to Baltrush’s memo, this was because the Commerford Zoo was “confident that this death was a result of kidney disease.” In other words, the USDA accepted the Commerford Zoo’s uninformed and unofficial cause of death, rather than requiring a standard necropsy.

The records also reveal the bleak existence Minnie is currently facing. She lives alone in a small barn with barred stalls and concrete flooring. She is allegedly let outside daily, although there is no proof of this other than the Commerford Zoo’s assertion that she is.⁷ She has not been seen in public for almost two years. Last year, a GoFundMe fundraiser endorsed by the Commerford Zoo, which sought to raise \$2.4 million, stated that the zoo was impoverished and unable to afford Minnie’s food or veterinary care.⁸ Concerned organizations and Connecticut residents alerted the Connecticut Department of Energy and Environmental Protection (“DEEP”) that the Commerford Zoo admitted that it could no longer provide for Minnie’s most basic needs and requested that a welfare check be conducted to ensure that Minnie was not in danger and being properly cared for.⁹ To our knowledge, no action was taken by DEEP.¹⁰

Now, the Commerford Zoo is again beginning to exhibit its animals at fairs. It is likely that they will resume forcing Minnie to travel to these events to give rides or be used in photo opportunities. This would be extremely detrimental to Minnie’s declining health, as she is nearing 50 years old and for decades has been subjected to living conditions that are known to cause elephants physical and psychological suffering. Even if the zoo were not to bring Minnie to fairs, her continued isolation in an environment completely inappropriate for an elephant is of great risk to her safety, health, and emotional well-being.

For over 40 years, the state of Connecticut has allowed Minnie to suffer. The Commerford Zoo has been cited over 50 times for violations of the Animal Welfare Act,¹¹ including for their

⁶ A necropsy performed on Beulah showed that at the time of her death she was suffering from pyometra and septicemia and had pleural adhesions, a coronary artery embolism, and a pulmonary artery embolism. <https://www.nonhumanrights.org/content/uploads/APHIS-Beulah-Necropsy.pdf>

⁷ Google satellite images and drone footage show that the Commerford Zoo’s property lacks an outdoor enclosure with proper fencing that would allow Minnie to move about freely.

⁸ *Save Our Elephant* GoFundMe fundraiser, <https://www.gofundme.com/f/20zls6ompc> (last accessed August 31, 2021). To date, the fundraiser has raised less than \$2,700.

⁹ <https://www.nonhumanrights.org/content/uploads/Welfare-concerns-about-elephant-at-Commerford-Zoo.pdf>

¹⁰ DEEP was the only state agency sent this complaint because when prior welfare concerns were raised to the Connecticut Department of Agriculture (“DoAG”), it claimed oversight authority rested with DEEP even though it also has oversight per Conn. Agencies Regs. §22-359-1 to 5 and Conn. Gen. Stat. §22-359(e) and (f). See OLR report at <https://www.cga.ct.gov/2017/rpt/pdf/2017-R-0186.pdf>.

¹¹ R.W. Commerford & Sons Traveling Petting Zoo Fact Sheet, <https://www.peta.org/wp-content/uploads/2021/02/commerford-petting-zoo-factsheet.pdf>.

failure to provide adequate veterinary care. Many people have observed Minnie being jabbed with a sharp bullhook, engaging in stereotypical behavior, and in visible distress. Still, enforcement officials and lawmakers have done absolutely nothing.

With your help, Minnie still has an opportunity to heal and live freely. Both TES and PAWS have offered to provide her with lifetime care at no cost to the Commerford Zoo. Because Minnie is now without the company of other elephants and remains in an environment radically unsuited to elephant well-being, the need for her release is more urgent than ever.

For Minnie's sake, please publicly call for the Commerford Zoo to promptly release her to a sanctuary. If the Commerford Zoo does not do so, please take all appropriate and necessary action to investigate the mounting welfare concerns for Minnie.

Sincerely,

Courtney Fern
Director of Government Relations
Nonhuman Rights Project

Rachel Mathews
Director of Captive Law Enforcement
PETA Foundation

Annie Hornish
Connecticut State Director
The Humane Society of the United States

Carrie LeBlanc
Executive Director
CompassionWorks International

Stephanie Harris
Senior Legislative Affairs Manager
Animal Legal Defense Fund

Jo-Anne Basile
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Jill Alibrandi
Connecticut Residents Seeking Sanctuary for
the Commerford Animals

Sheryl Becker
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Sandra Clinger
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