



July 29, 2020

USDA APHIS Animal Care
4700 River Road, Unit 84
Riverdale, MD 20737

RE: Welfare concerns about Minnie, an Asian elephant held captive by R.W. Commerford & Sons Inc. d/b/a/ the Commerford Zoo

I am writing on behalf of the Nonhuman Rights Project (“NhRP”) regarding an Asian elephant whose freedom we have been advocating for over the past two years. On July 21, 2020, the NhRP became aware of a GoFundMe fundraiser,¹ created on June 23, 2020, seeking to raise \$2.4 million to cover all costs associated with the care of Minnie, also known as Mignon, a 48-year-old Asian elephant owned and held captive by R.W. Commerford & Sons Inc. d/b/a the Commerford Zoo² in Goshen, CT. The fundraiser is explicitly endorsed by the Commerford Zoo and has been shared by William Commerford, President of the Commerford Zoo, at least six times on his public Facebook page.³

The fundraiser explains that, due to Covid-19, the Commerford Zoo has become “impoverished” and is in “desperate need of support” to maintain its care for Minnie. It states that the Commerford Zoo needs immediate financial assistance to provide Minnie with food, maintenance of her housing, and continued veterinary care, among urgent needs. The fundraiser was created nearly a month before the Nonhuman Rights Project became aware of it. Accordingly, the NhRP is greatly concerned that Minnie’s most basic needs are no longer being met.⁴

We request that the United States Department of Agriculture conduct a welfare check on Minnie to ensure that she is being properly cared for in accordance with federal laws and regulations.

Should Minnie be in immediate danger or needs to be removed from the Commerford Zoo’s care, two U.S. elephant sanctuaries, The Elephant Sanctuary in Tennessee and the Performing Animal Welfare Society, have standing offers to provide Minnie with lifelong care and refuge at no cost to the Commerford Zoo. The NhRP stands ready to help facilitate Minnie’s transfer to either sanctuary should our assistance be necessary.

¹ *Save Our Elephant* GoFundMe fundraiser: <https://www.gofundme.com/f/20zls6ompc>

² Exhibitor License No. 16-C-0006

³ William Commerford shared the fundraiser on June 25, 2020, June 28, 2020, July 4, 2020, July 6, 2020, July 12, 2020, and July 13, 2020.

⁴ As of July 27, 2020, the fundraiser has only raised \$1,345.00.

Thank you for your prompt attention to this urgent matter.

Sincerely,

A handwritten signature in black ink that reads "Courtney Fern". The signature is written in a cursive style with a large, prominent "C" and a long, sweeping tail on the "n".

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