

# Liebel Family Circus

USDA License #58-C-0288, P.O. Box 3230, Davenport, FL 33836

Liebel Family Circus (aka Florida State Family Circus, Great American Family Circus, Liebling Bros. Circus, or Liebling Bros. Family Circus), operated by Hugo Tomi Liebel (aka Tommy Liebel, Hugh Blum, or Hugo Bloom), has repeatedly failed to meet minimal federal standards for the care of animals used in exhibition as established in the Animal Welfare Act (AWA). The U.S. Department of Agriculture (USDA) has cited Liebel numerous times for failure to give veterinary care to an African elephant named Nosey (aka Tiny or Peanut); failure to provide animals in its care with wholesome and uncontaminated food, shelter from the elements, and adequate space; failure to provide primates with environmental enrichment; and failure to maintain structurally sound enclosures. The USDA has also cited Liebel for allowing animal enclosures to become filthy, mishandling animals, and withholding food for training purposes. The USDA has also fined Liebel for violations of the AWA, and Liebel was assessed a civil penalty of \$7,500 to settle formal charges brought against it by the USDA for repeated violations of the AWA, including failing to address concerns regarding Nosey's visibly poor skin condition for more than four years. In addition, Liebel was forced to cancel engagements in two cities because it failed to comply with city codes that require a criminal background check on all circus employees. Contact PETA for documentation.

**June 16, 2017:** The Florida Fish and Wildlife Conservation Commission (FWC) denied Liebel's application to renew his permit to possess Nosey in Florida on the grounds that he "withheld itinerary information" and submitted "materially false information" to the agency. Liebel had told the FWC that he didn't have any current travel itineraries, which the agency confirmed was false.

**June 22, 2016:** Liebel was charged with "petit theft" in Pasco County, Florida, for allegedly taking signs from protesters at a flea market in Port Richey on January 16, 2016.

**February 6, 2016:** The Florida Fish and Wildlife Conservation Commission issued a warning to Liebel for failing to supervise Nosey properly during a show. She was left unsupervised behind an electric fence.

**August 4, 2015:** The USDA cited Liebel for failing to have the program of veterinary care available to review and failing to have enough employees present to take care of Nosey and the other animals during a show in New Jersey.

**February 2, 2015:** The USDA cited Liebel for failing to maintain the enclosure housing a spider monkey. It had rusted metal bars in need of replacement.

**March 19, 2014:** The USDA cited Liebel for failing to supply adequate veterinary care to Nosey, who was observed to have an overgrown toenail curling upward and pulling away from the nail bed. In addition, Liebel was cited for improper handling of animals for failing to have a proper barrier between the public and the elephant ride area. The barrier had a large opening, and no responsible adult was around to monitor the area. Two small children approaching this area went unnoticed until a USDA inspector pointed them out.

**March 18, 2013:** Liebel agreed to pay a \$7,500 penalty to settle an administrative lawsuit filed by the USDA alleging 33 AWA violations. (See the December 9, 2011, entry.) He was also ordered to cease and desist from violating the law.

**December 11, 2012:** The USDA cited Liebel for failure to have an appropriate environmental enrichment plan for a spider monkey who had been living by himself since his companion died in mid-July.

**March 6, 2012:** After learning from PETA that the USDA had an administrative lawsuit pending against Liebel over numerous serious violations of federal law, the Arkansas National Guard canceled all Liebel Family Circus shows previously scheduled for armories in four cities.

**February 8, 2012:** After learning from PETA that the USDA had an administrative lawsuit pending against Liebel over numerous serious violations of federal law, Washington and Lee University canceled Nosey's appearance at the school's mock political convention.

**December 13, 2011:** The USDA cited Liebel for failure to maintain the perimeter fence of an elephant enclosure, which was under construction and not continuous, leaving the area open for unauthorized people or animals to gain access to the elephant.

**December 9, 2011:** The USDA filed an administrative

lawsuit against Liebel alleging 33 violations of the AWA. The violations set out in the complaint include the following: a sharp metal edge in Nosey's enclosure could injure her; nails that could injure her were protruding into her enclosure; Liebel repeatedly failed to treat her visibly poor skin condition (he was advised of concerns regarding her skin care as early as April 17, 2007, yet they hadn't been addressed to date); nails and metal rods were near her in the elephant barn; she was tethered in such a manner that she could move only a few feet from side to side; she was chained by two feet so tightly that she couldn't lie down on her side or make any forward or backward movement; the trailer used for transporting her contained accumulations of equipment in close proximity to her and had loose metal ceiling panels, exposed bolts, and flaking interior paint; she was tethered in a manner that forced her left foot in a forward position; she was repeatedly left unattended and accessible to members of the public; a veterinarian wasn't consulted after she was observed to have lost weight; the attending veterinarian's instructions weren't followed in regard to weighing her; her feet had overgrown soles with trapped manure and leaves; the area adjacent to the elephant enclosure was dirty and cluttered; a spider monkey had an 18-inch chain affixed to his collar when housed in his enclosure; two spider monkeys had access to twine in which they could become entangled; a spider monkey escaped and wasn't recovered for at least 10 days; a spider monkey was left unattended and tethered by a chain to a pony for an hour; two spider monkeys weren't provided with environmental enrichment; the side bars in the spider monkeys' enclosure were rusted and had sharp edges; the area outside the perimeter fencing for the spider monkeys had accumulated and discarded equipment and building materials; the public was allowed to feed an agitated primate food that was inappropriate for his dietary needs, including popcorn and cotton candy; inadequate perimeter fencing could endanger animals and the public; food was stored in a dirty trailer that had holes in the floor; and there were open bags of feed and evidence of vermin.

**February 23, 2011:** The USDA cited Liebel for failure to correct a previously identified noncompliance of inadequate veterinary care of Nosey for her chronic skin issues (the inspector reported that Nosey's skin was "very hard and dry to the touch" and that the current treatment was ineffective), for inadequate foot care, and for a lack of a written plan for meeting her nutritional needs. The USDA also cited Liebel for failing to weigh Nosey, in direct violation of the circus's attending veterinarian's recommendation.

**December 14, 2010:** The USDA cited Liebel for failure to correct a previously identified noncompliance of giving inadequate veterinary care to

Nosey, who had accumulations of "dead" and "dry, cracked" skin across her body. The inspector wrote that this "affect[s] the health and well-being of the elephant." Liebel was also cited for failure to store food in a manner that protects against contamination by vermin and failure to maintain the housing facilities for nonhuman primates in a manner that prevents escape or injury.

**November 11, 2010:** The USDA cited Liebel for failure to correct a previously identified noncompliance of inadequate veterinary care of Nosey, whose skin the inspector wrote had "been pointed out to [Liebel] for at least one year (since June 2009). ... The presence of excessive accumulations of dead skin does not provide for the comfort, health, and well-being of the elephant." Liebel was also cited for a direct noncompliance for failing to handle Nosey in a manner that ensured that there was minimal risk of harm to her and the public. In addition, the circus was cited for another repeat, direct violation for failing to provide Nosey with wholesome food of proper nutritional quality.

**February 28, 2010:** The USDA cited Liebel for failure to provide Nosey with an adequate feeding program. The inspector wrote, "Nosey appears to have lost some weight since the last observation."

**October 28, 2009:** The USDA cited Liebel for failure to keep the area immediately outside the perimeter fencing for the spider monkeys free of accumulations of trash, junk, waste, and discarded matter. The USDA inspector commented that the debris could offer a "breeding or living area for rodents and other vermin which could pose a disease hazard to the spider monkeys." Liebel was also cited for inadequate food storage. The inspector stated, "There were open bags of feed used for the elephant on the floor of the trailer adjacent to a bag of feed that had been chewed open by vermin." In addition, Liebel was cited for failure to keep the premises clean and in good repair as well as for failure to have a safe and effective program for the control of rodents.

**September 12, 2009:** The USDA cited Liebel for failure to correct a previously identified noncompliance of inadequate veterinary care for Nosey. The inspector wrote that the current treatment being utilized was ineffective.

**August 1, 2009:** The USDA cited Liebel for failure to correct a previously identified noncompliance of inadequate veterinary care of Nosey, whose skin the inspector reported "continues to have thickened areas of dead skin." The inspector also wrote, "The presence of excessive accumulations of dead skin does not provide for the comfort, health, and well-

being of the elephant.” Liebel received a repeat citation for handling a potentially dangerous animal in an unsafe manner that put the public’s safety at risk.

**July 14, 2009:** The USDA cited Liebel for failure to correct a previously identified noncompliance of inadequate veterinary care of Nosey, whose skin, the inspector reported, “continues to be thickened with areas of dead skin especially on the head, legs, and sides.”

**June 2, 2009:** The USDA cited Liebel for failure to correct a previously identified noncompliance of inadequate veterinary care of Nosey, whose skin, the inspector reported, was “extremely thickened with multiple layers of dead skin.” According to the inspector, the owner stated that Nosey was given a bath three times a day, but the inspector wrote that “[t]he owner was not observed bathing her at any time during 2 days of observation.” Liebel was also cited for failing to provide a sufficient safety barrier between the elephant and the public, handling potentially dangerous animals in an unsafe manner, leaving the elephant unattended or under the control of a child during public exhibition, leaving a spider monkey unattended while the animal was tethered to a pony for more than an hour, and leading the spider monkey into the audience by a leash so that the animal could take popcorn and cotton candy from children and other audience members. The inspector reported that some children did not want to feed the monkey, causing the animal to become agitated, and wrote, “The public could too easily be bitten or scratched during this monkey’s eagerness to get the food.” The USDA also cited Liebel for allowing the audience to feed the monkey food that was not provided by the licensee, allowing the monkey to eat a type of food that was not appropriate for the animal’s diet, exposing the monkey and the public to zoonotic disease hazards, and failure to provide the two spider monkeys with environmental enrichment.

**April 10, 2009:** The USDA cited Liebel for failure to give sufficient space to Nosey, who was tethered by a chain around her left front and right rear ankles. The inspector wrote, “The chains are very taut with very little slack for movement. This animal’s postural adjustments are limited due to the configuration of the chains and [she] is unable to lie down on her side. In the kneeling position, both chains were taut. This elephant could not make any movements forward or backward and is only restricted to movements only a few feet from side to side.” Liebel was also cited for failure to maintain an animal transport vehicle, which had a loose metal ceiling panel; two exposed bolts; paint that was peeling, chipping, and flaking; and various pieces of equipment such as a shovel and

wheelbarrow, all of which could potentially injure the animals.

**March 17, 2009:** The USDA cited Liebel for failure to correct a previously identified noncompliance of failure to maintain the elephant barn, which had protruding nails and metal rods that posed a risk of injury to the elephant. Liebel was also cited for failure to give adequate veterinary care to Nosey, whose skin was crusty and hard and who had dead layers of skin. The USDA also cited Liebel for allowing the March 13 escape of a spider monkey by failing to properly secure the tether to the collar as well as for failure to maintain the perimeter fence surrounding the elephant pen.

**March 16, 2009:** The state of Florida issued a \$180 citation to Liebel for the March 13, 2009, escape of a spider monkey. The escape was a misdemeanor violation of state wildlife regulations.

**March 13, 2009:** The Florida Fish and Wildlife Commission issued a warning to Liebel for giving elephant rides to the public despite the fact that the circus’ state permit had expired.

**March 13, 2009:** A spider monkey named Reggie escaped during an appearance at the North Lake Flea Market in Fruitland Park, Florida, when the owner failed to latch a leash correctly. The monkey fled into nearby woods and was on the loose for more than six weeks, according to the *Orlando Sentinel*, before being recaptured.

**May 22, 2008:** The USDA cited Liebel for failure to construct and maintain primary enclosures to protect animals from injury. The inspector observed that two spider monkeys had access to strands of hay twine that were tied to the bars of the enclosure and that the monkeys could “easily pull it into the enclosure and get tangled up in it or hang themselves with it” and that two separate areas of the elephant barn had protruding nails.

**November 10, 2007:** The Florida Fish and Wildlife Conservation Commission issued a warning to Liebel for unsanitary conditions for monkeys and failure to provide monkeys with water.

**August 6, 2007:** The USDA cited Liebel for failure to handle animals properly when an adult spider monkey was observed wearing a collar with an approximately 18-inch chain that dragged and swung as the monkey moved around the enclosure. The inspector wrote, “The chain length is too long and could possibly get hung on something and choke the animal.”

**May 31, 2007:** According to *The Journal-Standard*, Liebel was forced to cancel performances in Savanna, Illinois, because it had failed to comply with an ordinance requiring a criminal background check on all circus employees.

**April 17, 2007:** The USDA cited Liebel for failure to maintain enclosures in good repair. A dislodged metal wall was protruding into a travel enclosure for an elephant, exposing the animal to a risk of injury from a sharp edge. The inspector also noted that “[the] appearance of the skin of the elephant was of concern.”

**March 23, 2006:** The USDA cited Liebel for failure to provide an accurate itinerary, which prevented an inspection from taking place.

**November 3, 2005:** The USDA cited Liebel for failure to correct a previously identified noncompliance of not having a perimeter fence in place for the elephant.

**September 20, 2005:** Liebel was issued a \$2,885 stipulation by the USDA for violations of the Animal Welfare Act, including failure to provide Nosey and a steer with adequate veterinary care; failure to provide the elephant, primates, and hoofed animals with adequate space; failure to provide a safety barrier to separate the public from the animals; failure to safely handle Nosey, resulting in injury to an employee (see July 4, 2004); failure to safely handle a spider monkey who was housed with a permanent metal link chain around his neck with about 9 inches of links hanging from it, posing a risk of entrapment, snagging, choking, or hanging; failure to provide transport enclosures that were structurally sound and sufficiently lit; and failure to erect a perimeter fence.

**September 13, 2005:** The USDA cited Liebel for failure to correct a previously identified noncompliance of not maintaining the cleanliness of the primate enclosure. The inspector wrote that the enclosure was “extremely soiled,” the wall and hide box were “heavily soiled with urine and scent markings and dirt,” the floor had a “buildup of green algae growing on the surface,” and the rope swings were “extremely dirty and soiled.”

**May 10, 2005:** The USDA cited Liebel for failure to have a responsible person available so that an inspection could be performed.

**November 23, 2004:** The USDA cited Liebel for failure to correct numerous previously identified noncompliances, including failure to supply permanent housing for Nosey, who, at the time of the inspection, “[w]as housed in the yard, on leg chain restraints. She was chained [by her left front leg and

left rear leg] so that she could not take a full stride. She swayed stereotypically from side to side.” Liebel was also cited for failure to offer adequate lighting to two primates who were housed in a compartment at the front of a travel trailer that was so dark that the inspector could not properly see the animals as well as failure to provide a perimeter fence.

**September 15, 2004:** In an affidavit obtained by the USDA from a Liebel employee who was attacked by Nosey, the injured worker recounted the frequent use of electric prods on Nosey and detailed an incident in which the trainer “used the [bullhook] handle, turned off the lights in the performance ring and beat the elephant. He at the time directed others to take part in that by using other objects such as [a] sledge hammer and shovel handles. At that time the elephant was staked down by all four legs.” He also stated in the affidavit that Nosey’s attack on him “was not the first time the elephant had reached or struck out at people who worked at the circus.”

**September 15, 2004:** The USDA cited Liebel for failure to correct numerous previously identified noncompliances, including failure to give adequate veterinary care to Nosey, whose skin was “rough, thickened, irregular, cracked, dry, and flaking,” whose foot pads were “thickened and corrugated in appearance” and/or had some “loose flap development,” and whose front toenails and cuticles showed “uneven growth patterns and excessive thickening”; failure to include protocols for foot and skin care on the program of veterinary care; failure to supply adequate housing to two monkeys who were kept in a cage with excessively rusty metal doors and inadequate lighting and without sufficient space to make normal postural movements and adjustments; and failure to give sufficient space to an elephant who, during evening hours and periods of inclement weather, was housed in a transport trailer that did not allow the animal to “turn about, lie down, stretch, etc.” and who was at risk of injury from being housed next to a steer with sharp horns.

**July 15, 2004:** The USDA cited Liebel for failure to correct numerous previously identified noncompliances, including for failure to give adequate veterinary care to Nosey, whose skin appeared “thickened and irregular”; lack of documentation that the elephant’s skin-care regime had been discussed with and approved by the attending veterinarian; failure to give adequate veterinary care to a steer who, the inspector wrote, was “[s]till being pestered by flies” and “[whose] interdigital area above the hooves appear[s] slightly irritated and pinkish in color”; and an exposed sharp metal edge in the elephant trailer. Liebel was also cited for failure to provide documentation of a recent tuberculosis test



for the elephant and current health certificates for two spider monkeys.

**July 4, 2004:** Nosey attacked a worker during an appearance in Clinton, Iowa. The worker was tending to a water dish when the elephant hit him with her tusk, lifting him off his feet and propelling him down an incline. The worker was rushed to the hospital and received stitches for a head injury.

**April 28, 2004:** The USDA cited Liebel for failure to give veterinary care to an elephant named Nosey, whose skin appeared “thickened and irregular” as well as to a steer who was being “pestered by numerous flies.”

**March 2, 2004:** The USDA cited Liebel for failure to correct a previously identified noncompliance of not having a complete program of veterinary care.

**February 3, 2004:** The USDA cited Liebel for failure to have a responsible person available so that an inspection could be performed as well as failure to update its travel itinerary.

**January 2, 2004:** The USDA cited Liebel for failure to correct numerous previously identified noncompliances, including failure to supply permanent housing for Nosey, who, when not on the road, was housed in the transport trailer or kept chained in a yard; failure to give sufficient space to an elephant and a steer who, at night and during inclement weather, were housed in a trailer that was not large enough for postural adjustments and freedom of movement and put the animals at risk of injuring one another; failure to repair ripped and loose metal sheeting in the elephant transportation trailer; and failure to provide a perimeter fence. Liebel was also cited for improper handling of a monkey who had a metal linked chain with 8 inches of hanging links around his neck, which the USDA inspector wrote “[is] likely to cause trauma and may be fatal”; keeping primates in a rusty compartment of an old truck devoid of adequate lighting; failure to have records reflecting routine veterinary care for the steer; and failure to have a complete program of veterinary care for the primates.

**June 16, 2003:** The USDA cited Liebel for at least the fifth time for failure to correct a previously identified noncompliance of not supplying minimum space to two monkeys who were housed in a cage measuring 2 feet wide by 8 feet long by 2 feet high (5 feet short of the minimum requirements) as well as for again failing to provide an adequate barrier between animals and members of the public because of large gaps in the perimeter fencing around the elephant and the lack of any barrier to prevent members of the

public from putting their fingers directly into the primate enclosure. Liebel was also cited for failure to give veterinary care to an elephant who had “[a] buildup of oil, dirt, and dead skin clogging the skin pores on [the animal’s] body” and to a steer who appeared thin and gaunt; failure to provide the elephant with shade; failure to provide the primates with environmental enrichment or sufficient ventilation; and splintered wood on the inside of the door of the elephant transport trailer.

**May 12, 2003:** The USDA cited Liebel for failure to correct a previously identified noncompliance of not giving minimum space to an elephant and a steer who, at night and during inclement weather, were housed in a trailer that did not have sufficient room for the elephant to turn around or for either animal to make normal postural adjustments. Liebel was also cited for transporting the elephant and a steer in the same trailer that put the elephant at risk of being injured by the steer’s sharp horns; failure to give sufficient space to a rabbit and to two monkeys who were housed in a cage measuring only 2 feet high (5 feet short of the minimum requirements); failure to maintain enclosures that contained sharp and/or protruding metal; a porous wooden floor in the primate enclosure that could not be adequately cleaned and sanitized; failure to conduct elephant tuberculosis tests under the direct supervision of a veterinarian; and an incomplete program of veterinary care.

**April 30, 2003:** The USDA cited Liebel for failure to correct previously identified noncompliances of not giving minimum space to two monkeys, who were housed in a cage measuring only 2 feet high (5 feet short of the minimum requirements) and to an elephant who, at night and during inclement weather, was housed in a transport trailer that did not have sufficient room in which she could turn around or raise her head or trunk. Liebel was also cited for failure to give veterinary care to an elephant with excessive pad overgrowth on one foot, thereby putting the elephant at risk of impaired movement, infection, or other medical problems; failure to conduct elephant tuberculosis tests under the direct supervision of a veterinarian; an incomplete program of veterinary care; failure to provide an adequate barrier around the elephant to ensure the safety of the elephant and the public while members of the public were within reach of the elephant, failure to have an experienced handler present with the elephant during public exhibition of a potentially dangerous animal; and insufficient ventilation in the animal transport trailer.

**September 6, 2002:** The USDA cited Liebel for failure to provide an elephant with shelter from sunlight.

**July 27, 2002:** The USDA cited Liabel for failure to comply with veterinary-care requirements and failure to maintain primate cages. The circus did not have a program of veterinary care or results of tuberculosis tests for the elephant and two primates. A spider monkey had not been tested for tuberculosis.

**February 28, 2002:** The USDA cited Liabel for a fourth time for failure to give minimum space to the primates and the elephant, inadequate lighting, failure to provide perimeter fencing, cages in disrepair, and poor housekeeping that posed life-threatening hazards to animals. The animals were left stored inside transport trailers in the dark at the circus's winter quarters. The small monkey cages inside the trailer were only 2 feet high, 5 feet short of the minimum requirements. The elephant was kept inside a compartment in the transport trailer while at the winter quarters and on tour or sometimes chained to two trees, which did not allow adequate freedom of movement and exercise.

**January 27, 2002:** The USDA cited Liabel for mishandling a rabbit at risk of injury, failure to provide rabbit cages that met minimum space requirements, keeping a dog tied on a 4-foot tether, and poor sanitation. The inspector found sharp pieces of glass, used during an act in the show ring, that could easily injure the elephant's feet as well as other animals.

**January 23, 2001:** The USDA cited Liabel for failure to have current tuberculosis tests for several elephant handlers, failure to maintain transport enclosures with compartments only 2 feet high for the primates, failure to give adequate space to the primates confined in small transport compartments during periods when the circus was not traveling, and failure to provide the elephant with adequate shelter and space.

**October 18, 2000:** The USDA cited Liabel for improper food storage.

**May 11, 2000:** Liabel was cited for filthy conditions. The inspector wrote, "The traveling enclosure for the five dogs in the act is excessively soiled with urine and feces. It has a strong odor." The circus was also cited for a poorly maintained primary enclosure that could cause injury to the animals.

**January 10, 2000:** The USDA cited Liabel for failure to correct a previously identified noncompliance of inadequate veterinary care. The inspector found an elephant suffering from an untreated skin condition. The circus was cited for failure to have its three elephant handlers tested for tuberculosis. The circus was also cited for failure to provide shelter, poorly maintained primary enclosures that allowed animals to escape, poorly maintained transport enclosures

that had the potential to cause injury, and poor housekeeping.

**January 25, 1999:** The USDA cited Liabel for failure to correct previously identified noncompliances of inadequate veterinary care and poor housekeeping. The inspector wrote, "There is no written record of a veterinary examination and evaluation of the elephants' skin or the nonhuman primates' hair, coat and diet." The circus was also cited for an elephant transport trailer in disrepair, rotted wood in the primate enclosure, and an accumulation of material stored along one side of the nonhuman-primate enclosure.

**July 21, 1998:** The USDA cited Liabel for filthy enclosures, failure to provide adequate veterinary care, an elephant transport trailer in disrepair and without adequate ventilation, improper feeding, and failure to have a current environmental enrichment plan for the primates. The inspector wrote, "Excreta is present in area [where the] elephant is chained. Urine odor is high, and ground is soggy with wet urine and feces. ... Structural strength of trailer for elephant is unsound. There are three (slick) bald tires on the trailer. There are large areas of 'spot' welding ... [which] weakens the frame structure and is a hazard to hauling the elephant. Sharp pieces of metal are exposed ... [the] elephant could sustain a very bad laceration. ... Elephant has symptoms of deep grooves in the four feet. ... There is noticeable hyperkeratosis on the ears, and skin is too dry."

**June 16, 1998:** Cedarburg, Wisconsin, officials canceled a Liabel show minutes before the 3 p.m. showtime because the circus owner had refused to comply with a city-code section that requires circuses to submit a list of employees for background checks. Police have at times discovered fugitives traveling with circuses, and the ordinance was enacted out of concern for the safety of residents and visitors.

**June 3, 1998:** The USDA cited Liabel for failure to correct previously identified noncompliances of providing primates with insufficient space and inadequate environmental enrichment and having inaccurate records and identification. The circus was also cited for improper food storage and failure to provide a complete itinerary.

**May 1, 1998:** The USDA cited Liabel for failure to correct previously identified noncompliances of mishandling and inadequate environmental enrichment for primates, inaccurate records and identification, and enclosures in disrepair. The inspector wrote, "The primates still have chains around their necks and were staked to the ground. ... Chains must not be used/ kept on these animals. ...

[The dog and primate enclosures] are still rusty [with] rotted wood and peeling paint." The circus was also cited for failure to give minimum space to three primates who were kept in a single cage measuring 4 feet high by 3½ feet long by 2 feet wide. The inspector noted that there was no result for the elephant's tuberculosis test and that the owner was still withholding food from the elephant during the day for training purposes.

**December 18 and 22, 1997:** The USDA cited Liebel for failure to correct previously identified noncompliances of not giving adequate veterinary care to a cow with hair loss and an elephant with crusty skin, inadequate cleaning, and failure to maintain the elephant enclosure. The circus was also cited for mishandling animals. Food is withheld "for a day or so" for training purposes, and two primates had chains around their necks that could potentially strangle the animals. The circus was cited for poor housekeeping, feeding moldy hay, failure to follow an environmental enrichment plan for primates, failure to maintain enclosures, failure to have an exercise plan for the dogs, and inaccurate records and identification.

**April 28, 1997:** The USDA cited Liebel for a travel trailer in need of repair and improper food storage.

**January 21, 1997:** The USDA cited Liebel for failure to correct previously identified noncompliances of not providing adequate veterinary care, not having food on the premises for the animals, inadequate cleaning, and failure to maintain the elephant enclosure and transport vehicle. The inspector wrote, "There are no records on the goat's death [or] medical records ... for deworming." The circus was also cited for failure to provide shelter from the elements and inadequate cleaning.

**August 1, 1996:** The USDA cited Liebel for feeding a deficient diet to primates and failure to maintain enclosures.

**January 4, 1996:** The USDA cited Liebel for failure to correct previously identified noncompliances of not having medical records to indicate if the animals had received vaccinations, dewormings, and tuberculosis tests; contaminating food with feces and urine; and failure to maintain and clean transport enclosures. The circus was also cited for filthy conditions, failure to have an adequate supply of food on the premises, failure to provide water, housing together incompatible animals, and failure to handle elephants in a manner that would protect the public and the animals.

**April 13, 1995:** The USDA cited Liebel for failure to supply the required itinerary.

**February 17, 1995:** The USDA cited Liebel for failure to correct previously identified noncompliances of not giving veterinary care to a goat who appeared thin and was in need of hoof trimming, not having medical records to indicate fecal exams or dewormings, not having an environmental enrichment plan for primates, and storing food in a manner that allowed feces and urine contamination from the primates. The circus was also cited for a filthy transport enclosure and improperly storing primate chow that contained rodent droppings.

**February 14, 1995:** The USDA cited Liebel for failure to supply the required itinerary.

**January 9, 1995:** The USDA cited Liebel for not allowing access to records and property.

**February 23, 1994:** The USDA cited Liebel for failure to correct previously identified noncompliances of not maintaining structurally sound enclosures. The circus was also cited for failure to give veterinary care to a goat with overgrown hoofs, failure to have an acceptable environmental enrichment program for primates, improper food storage, and failure to provide shelter from the elements.

**August 2, 1993:** The USDA cited Liebel for inadequate feeding of primates.

**March 3, 1993:** The USDA cited Liebel for an unsafe primate enclosure with chewed, rotting wood and an exposed nail; failure to provide primates with an environmental enrichment plan; and failure to provide enclosures of sufficient strength to contain elephants.