

I, AARON A. WILSON, being duly sworn on oath make the following statement:

I make this statement freely without promise of reward to anyone. My address is
Vacaville, CA

I was employed at Six Flags Marine World as an apprentice animal trainer in the Land Animal Keeping Department from March of 1998 until April of 2000. During this time, I witnessed the mistreatment of the animal collection at the park and what I believe to be negligent conduct by park officials.

When I began my employment, I started out working with the kangaroo and wallaby herd. One of my first tasks was to clean out the "Walk About" where four Grey Kangaroos were being kept. The park had already moved the rest of the herd into some holding pens on the back road due to stress being caused by a new ride called "Boomerang." The Boomerang is a loud, thundering rollercoaster, described by Six Flags on its website as a "towering steel-track supercoaster that blusts through two intense corkscrews and a nerve-shattering vertical loop."

Every time the Boomerang went off, the remaining kangaroos would frantically hop around in search of escape, hitting fences and slamming into one another causing injuries to many of the animals. I personally witnessed the kangaroos hurl themselves into the fence until they became bloody. Six Flags Marine World had left the Grey Kangaroos in the "Walk About" as a test group to see if they would eventually get used to the ride. It was obvious from day one that the ride deeply distressed these animals, but the park left them there for at least a week and a half. During that time the animals suffered great stress each and every time the ride went off (at least 2 or 3 times a day). This occurred sometime around March or April 1998.

After about a week and a half of what I considered to be outright abuse, the park finally took the four Grey Kangaroos out of the enclosure and introduced them back into the rest of the herd. I believed that the animals should have been moved immediately when their strong reaction to the rides became apparent. Instead, the four kangaroos were left to suffer at the park's discretion.

As if this conduct weren't bad enough, the kangaroo and wallaby herds, which at the time consisted of approximately 4 Red Kangaroos, 4 Gray Kangaroos, 20 Bennet's Wallabies and 8 Dama Wallabies, were crammed into four small pens on the back road because the park had not planned ahead enough to provide them with an adequate enclosure. In fact, park officials had to scrape together a place to put them in time for the start of the season. The kangaroos and wallabies were placed in a pen that was sandwiched between the Elephant Log Show and the bathrooms. This pen was surrounded on all sides by pathways, leaving nowhere for the animals to go for privacy. The animals could have had privacy if they had been given access to the back pens, but they were locked out from this area while the park was open. This is because the animals appeared to be extremely stressed out by the constant flow of people and noise, and probably would have spent all their time in the back pens if given access. The wallabies, for example, would congregate in the back of the pen near the gate all day long. As soon as the back



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gate was opened at the end of the day, the wallabies would rush out. They clearly shied away from the public and wanted the privacy of the back pens. But, while the park was open, they were forced to endure the crowds without relief.

Kangaroos and wallabies suffer from stress very easily. Once stressed out, they can become sick and eventually die. At least 12 macropods died during my tenure at Six Flags Marine World. In my opinion, twelve animals out of a total population of approximately 34 is a very high death rate in just two years. I believe something is seriously wrong with the way that Six Flags Marine World is keeping and treating these animals.

Among these deaths was an adult female Dama Wallaby named Gracie. She had an infection of the cloacal area, which was routinely cleaned out once a day, or once every other day. To my knowledge, Six Flags Marine World veterinary staff never addressed the cause of the infection. The repeated capture of this animal and the cleaning of her infection stressed her out greatly. She became very stressed out and sick and eventually died.

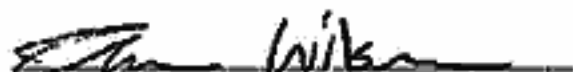
During the 1998 season, I found a Dama Wallaby named Philip breathing heavily with thick mucous coming out of his nose and mouth. Ordinarily it was difficult to get close to the wallabies, but this time, I could actually get right up to Philip and touch him. I alerted the Land Animals Supervisory staff and the veterinary staff came to look at Philip, but he died anyway. A necropsy was performed, but to my knowledge, Six Flags Marine World never determined the cause of his death. They surmised that he had been bitten by a spider or other insect and had a bad reaction. But, to my knowledge, there was no evidence to confirm that this had taken place.

Another albino male Bennet's Wallaby named Randy died during my tenure as well. I found him dead in his pen when I went to do the morning cleaning. A necropsy showed that he had trauma to his chest area or lungs. He had suffered a blow to the chest that may have been caused in a fight with a bigger kangaroo.

Another animal to die at the park while I was employed there was Fuzzy, a Bennet's Wallaby. A necropsy showed that she had an enlarged esophagus. This made it harder for her to keep food down. As a result, she wasn't getting the proper nutrients and she got extremely thin. Her teeth had also rotted from the acid reflux she suffered as a result of her condition.

A Red Kangaroo named Gibson died toward the end of my tenure at the park. He had liver problems, but I do not believe that the park ever determined a conclusive cause of death.

Several of the kangaroos and wallabies suffered from calcified stones, a result, I believe, of improper nutrition. One female Bennet's Wallaby suffered from large calcified stones in, I believe, her kidneys. Another Red Kangaroo had recurrent stones that blocked in his urinary tract. He had two or three surgeries to remove the stones, and had holes in his penis where the surgery had taken place. When he urinated, it was like a little sprinkler. Other macropods suffered from similar problems with calcified stones.



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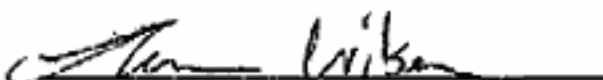
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I witnessed mistreatment of other animals as well during my tenure at the park. Miles, a 16 - 18 year old Bactrian Camel, was a big issue. He died shortly after I left the park in April 2000. Miles was an intact male, who had been used for breeding prior to Six Flags management of the park. Intact male camels go through a five to six month rutting period. During this time, they become very aggressive and extremely territorial. Miles would become agitated at the sight of new people or objects that entered into or passed his area. He frequently charged the fences in an attempt to attack these perceived threats. In doing so, he would slam himself against the fences, making contact with the fence with his front shoulder and his chest. Seasons of this behavior took their toll on Miles. He suffered from pain in his shoulders, as could be ascertained from his walk. His condition got worse and worse. He began to have difficulty getting up and walking. Toward the end of my employment at the park, Miles' condition had really deteriorated. He would spend about 90 percent of his day lying down. He would only get up to eat or drink. Our staff brought Miles' problems to the attention of the management of the Land Animals Department (Mark Jardarian, Manager and Amy Canova, Supervisor). The veterinarian, Laurie Gage, was also aware of the situation. They decided to just keep an eye on him for further problems and to get him out for daily walks, hoping it was just stiffened muscles.

They let Miles' condition get really bad before they treated him. It was a major effort just to get Miles up in order to take him out for walks. Sometimes it took 30 - 45 minutes just to get him to stand up. When out on walks, he would occasionally stumble, slamming into the ground. Finally, they decided to give Miles painkillers to ease the pain while they further observed the animal. The doses of painkillers were slowly increased over time as the effect they were having began to decrease. Soon, the park had Miles on a dose almost double the recommended amount. They also kept him on these painkillers for extended periods of time, which I understand to be contrary to the way in which this medication is to be used. One of the consequences of long-term use is ulcers in the stomach lining.

During this time, to my knowledge they never x-rayed Miles or did any other diagnostic work. Six Flags Marine World lacked equipment for large animal veterinary practice, so Miles would have had to be taken to UC Davis for x-rays. This idea was turned down by the Land Animals Department manager, Mark Jardarian, who said it would not be cost-effective, because x-rays were too expensive and Miles was an old animal anyway. So the problem continued.

After several months, it became apparent that the painkillers were not helping Miles. Then Mr. Jardarian, Ms. Canova and Dr. Gage debated for approximately one and one-half months about what to do next. Finally, they got a veterinarian from UC Davis to come out. This veterinarian observed Miles and concluded that the problem was indeed in his shoulder. He decided to inject cortisone into the shoulder. He suggested that the Six Flags Marine World veterinarian Laurie Gage administer the shot. I believe that Dr. Gage was not very skilled when it came to caring for the land animals. In fact, she was so unsure of her own abilities that she declined to administer the shot, even when the UC Davis veterinarian said that he would guide Dr. Gage through the procedure.



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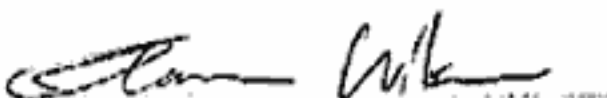
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Miles shoulders deteriorated further. This is the last thing I witnessed with Miles before I left the park. I believe that Six Flags Marine World's treatment of Miles is another example of neglect and irresponsibility that the park demonstrated toward its animals. It appeared to me that Six Flags Marine World put money ahead of animal welfare. In my opinion, no responsible animal facility would have treated animals in this manner. Miles died about a month after I left.

As stated above, I do not believe that veterinary care was adequate for the animals in the Land Animal Keeping department. Dr. Gage appeared to be unskilled and unknowledgeable about exotic land animals, and most of the veterinary technicians were not certified, but rather had received their training at the Six Flags Marine World park.

Another example of Six Flags Marine World being ill equipped and unable to properly care for its animals is a giraffe named Abby. One afternoon during the 1999 season, I was about to open the giraffe dock for a feeding, when a guest brought to my attention that a giraffe was chewing on some wire. I looked up to see Abby chewing on a wire mesh used to guard the wood on the dock from being eaten. The piece of mesh was about the size of the palm of my hand. I tried to get Abby to drop it but she just kept balling it up. She eventually swallowed the wire ball. I postponed the feed and called for my supervisor. Mark Jardarian the Land Animals Department manager and the veterinarian, Dr. Gage, came, looked at Abby and told me to resume the feeding. They decided there was nothing that they could do and that we should just keep an eye on her. The reason they could do nothing was that the park lacks a chute to restrain giraffes for physical examination. This is a major problem. Giraffes are extremely difficult to put under anesthesia due to their size and complex circulatory system. Sedation of a giraffe is dangerous, simply because the fall alone could seriously injure the animal's neck and legs. That's why almost all facilities that house giraffes have a chute. Six Flags Marine World does not. If something happens to one of the park's giraffes, they cannot do anything. Luckily, the incident with Abby passed without injury or complication. But the lack of a chute is an accident waiting to happen. I believe that Six Flags Marine World's lack of a chute for the giraffes is irresponsible and a clear example of inadequate care.

During my tenure, staffing levels were another problem that prevented the proper care of the park's animal collection. While I worked at Six Flags Marine World, my department, the Land Animals Keeping Department, was one of the most understaffed at the park. We had five people in our department and we were responsible for the care of over 50 animals. One of the members of our staff was also the primate trainer, so he spent approximately 75 percent of his day with the primates. On an average day, there were only three people on staff, and just two and one-quarter if one was the primate trainer. This made it impossible to get the animals on walks throughout the day because most of our time went to cleaning enclosures. The 6 camels would sometimes go a week or more left in their small pens without exercise. The only time staff levels increased was when the park was open. Then Six Flags would hire seasonal employees to come in so we could have enough staff to interact with the public. However, the animals still didn't get out for exercise due to crowds and ride operation.



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Before the introduction of rides into the park, the animals were taken out frequently to walk the park, and the enclosures were much more expansive, offering some seclusion and privacy from the crowds for the animals. After the rides were constructed, starting in 1997, the animals are limited to one corner of the park, sometimes to much smaller enclosures than the ones in which they were housed before the rides. The Aoudads or Barbary sheep were taken out of enclosures altogether. They were taken off exhibit and put on the back road in a fifty by seventy five-foot dirt enclosure. They are may be still there today. There were three of these sheep, one of whom was very old and decrepit. The other two sheep acted very aggressively toward this older animal. Competition among the animals is normal, but in this case the small space to which the animals were confined made the situation much worse. This sheep was constantly picked on and did not receive enough food or shelter. Finally, she was euthanized during the 1999 season after becoming extremely weak.

In my opinion, with all the new rides and attractions, there simply is no place left to adequately house the animals. The kangaroos and wallabies are another example of pushing animals into tighter spaces. They ended up with an enclosure that allows them to be harassed by the public very easily. Oftentimes I would find someone throwing objects like gum or wadded up paper at the kangaroos, subjecting them to irritation and stress. The crowds that come through the park now that it is a theme park are much larger than the animals are used to as well. I have witnessed the negative impact of the large crowds, high noise levels and lack of privacy on many of the animals at the park.

In addition to failing to provide adequate facilities and care for its animal population, Six Flags Marine World also failed to provide a healthy environment during my tenure at the park. There was a serious rodent problem in the Land Animal kitchen area and throughout the animal enclosures (including the Gentle Jungle and the orangutan enclosure), and down the back road. During the last six months of my tenure, I personally was catching six rats a day in the kitchen alone. We would continuously find large amounts of rodent feces on the counter tops and on the floor in the food preparation areas. The dry storage area was infested with rats and reeked of rodent excrement. Bags of feed would be taped up or thrown away weekly depending on the amount of feces and urine on or in them. Sometimes feed bags covered with rat urine were still used to feed the animals. Rats ran rampant through the wallaby and kangaroo enclosures. We discovered a large amount of corn cobs stashed in and around the outside of the exhibit in places only rats could go.

I believe that the rodent infestation could have been a contributing factor in the numerous wallaby deaths during my tenure, for which no causes of death were determined in most instances.

From what I witnessed, the U.S. Department of Agriculture inspections of the park were not adequate. The USDA inspector would be taken on a walking tour of the Land Animals department with the manager, Mark Jardarian. The inspector would just poke his head into areas, but he would not actually inspect much. He didn't pick anything up, or look under


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anything. I never saw this inspector examine any of the animals, or even look at them closely. I also never saw him speak to any of the non-management employees. The park always tried to predict when the USDA inspector would be coming and they would clean things up in anticipation of his visit. When the inspector showed up unexpectedly, word would go around the park to hurry up and clean up and improve things before the inspector arrived in our area.

In conclusion, I witnessed what I consider to be numerous instances of animal mistreatment and negligent care at Six Flags Marine World park. I offer my personal experiences in hopes that they can be used to investigate the unfortunate situation at Six Flags Marine World. I hope that Six Flags Marine World is ultimately forced to enhance the conditions of its facilities and the treatment of its animals or to forfeit the right to keep such wonderful animals.

I have read this statement and affirm under oath, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, that the foregoing statement is true and correct to the best of my knowledge.


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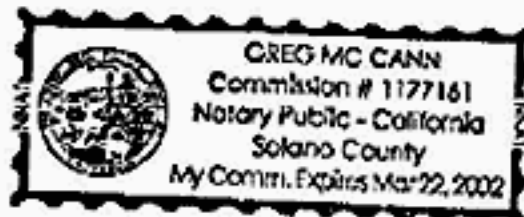
SUBSCRIBED AND SWORN TO BEFORE ME

THIS 15 DAY OF March, 2001

BY Aaron Wilson



NOTARY PUBLIC




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