

**IN THE COURT OF QUEEN'S BENCH OF ALBERTA  
JUDICIAL DISTRICT OF EDMONTON**

**BETWEEN:**

**TOVE REECE, ZOOCHECK CANADA INC.  
and PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS INC.**

**Applicants**

**-and-**

**CITY OF EDMONTON**

**Respondent**

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**AFFIDAVIT OF LISA WATHNE**

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**I, LISA WATHNE, of the City of Lake Forest Park, State of Washington, MAKE OATH AND SAY:**

1. I am employed by one of the Applicants in this action and such have personal knowledge of the matters deposed to, except where otherwise stated to be based on information which I verily believe is true.

**People for the Ethical Treatment of Animals**

2. I am currently employed by the People for the Ethical Treatment of Animals Inc. (herein "PETA"). I have been a Captive Exotic Animal Specialist with PETA since April 2003. PETA is the largest animal rights organization in the world with more than two million members and supporters. Its objective is to alleviate animal cruelty and establish animal rights. It was

incorporated as a 501(c)(3) non-profit corporation in 1980 pursuant to Title 13.1 of the Code of Virginia. Attached to this affidavit as **Exhibit A** is a copy of PETA's Articles of Incorporation which I verily believe to be true.

3. PETA has 2,630 members and supporters in the Province of Alberta and of those, 1,849 are in the City of Edmonton.

**PETA and Zoo Animal Rights**

4. PETA focuses its attention on four industries that have the highest risk for animal abuse: factory farms, laboratories, the clothing industry and the entertainment industry, including zoos. Specifically, PETA has campaigned for the rights of elephants held captive in the San Antonio Zoo, the Alaska Zoo, The Mirage Hotel and Casino, the Lincoln Park Zoo, the Los Angeles Zoo, the San Francisco Zoo and the Philadelphia Zoo.

5. PETA achieves the improved welfare of captive animals through public education, cruelty investigations, research, animal rescue, legislative campaigns and popular protest. It has been involved in this kind of advocacy since 1980.

6. I make this Affidavit in support of an application for a declaratory judgment against the City of Edmonton.

SWORN BEFORE ME at the City )  
of Lake Forest Park )  
on this 28<sup>th</sup> day of )  
January, 2009. )

  
LISA WATHNE

  
Notary Public

