

**Action no.:**  
**Sworn by:**  
**Sworn on:**

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

**BETWEEN:**

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

**-and-**

**CITY OF EDMONTON**  
**Respondent**

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**AFFIDAVIT OF TOVE REECE**

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I, Tove Reece, of the City of Sherwood Park, Province of Alberta, **MAKE OATH AND SAY:**

1. I have personal knowledge of the matters deposed to, except where otherwise stated to be based on information which I believe is true.

2. I am currently a resident of Alberta. I have lived in Sherwood Park, Alberta for twenty-five years.

**Animal Activism**

3. I have visited the Edmonton Valley Zoo more than a dozen times. I have specifically visited Lucy, the elephant housed in the Edmonton Valley Zoo, on many occasions. As an Alberta resident who cares about the welfare of animals, I am particularly invested in the welfare of the animals at the Edmonton Valley Zoo.

4. I have a long history of being concerned with animal welfare. I am the founder of an organization called Voice for Animals Humane Society that works to improve animal welfare in the province of Alberta, specifically in and around Edmonton. As an organization, we have tried to raise awareness about Lucy's intolerable conditions at the Edmonton Valley Zoo.

**Edmonton Valley Zoo**

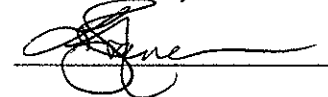
5. I have visited the Edmonton Valley Zoo's website. Under "General Information" it states that, "The Edmonton Valley Zoo is owned and operated by the City of Edmonton." Given this information, it is my understanding that the City of Edmonton owns the Edmonton Valley Zoo and is responsible for its actions. I, with others, am filing an application for a declaratory judgment that Lucy the elephant is suffering in her current conditions at the Edmonton Valley Zoo against the City of Edmonton.

6. On October 7, 2009, I attended Lucy's enclosure at the Valley Zoo. I used a Ryobi Tek 4 professional laser distance measure to determine and record the exact measurements of Lucy's enclosure. I then provided a rough sketch of this enclosure and the measurements to Julie Woodyer (Exhibit A).

7. 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 Sherwood Park, Alberta )  
on this 12 day of )  
December, 2009. )  
JANUARY, 2010 ✓ )

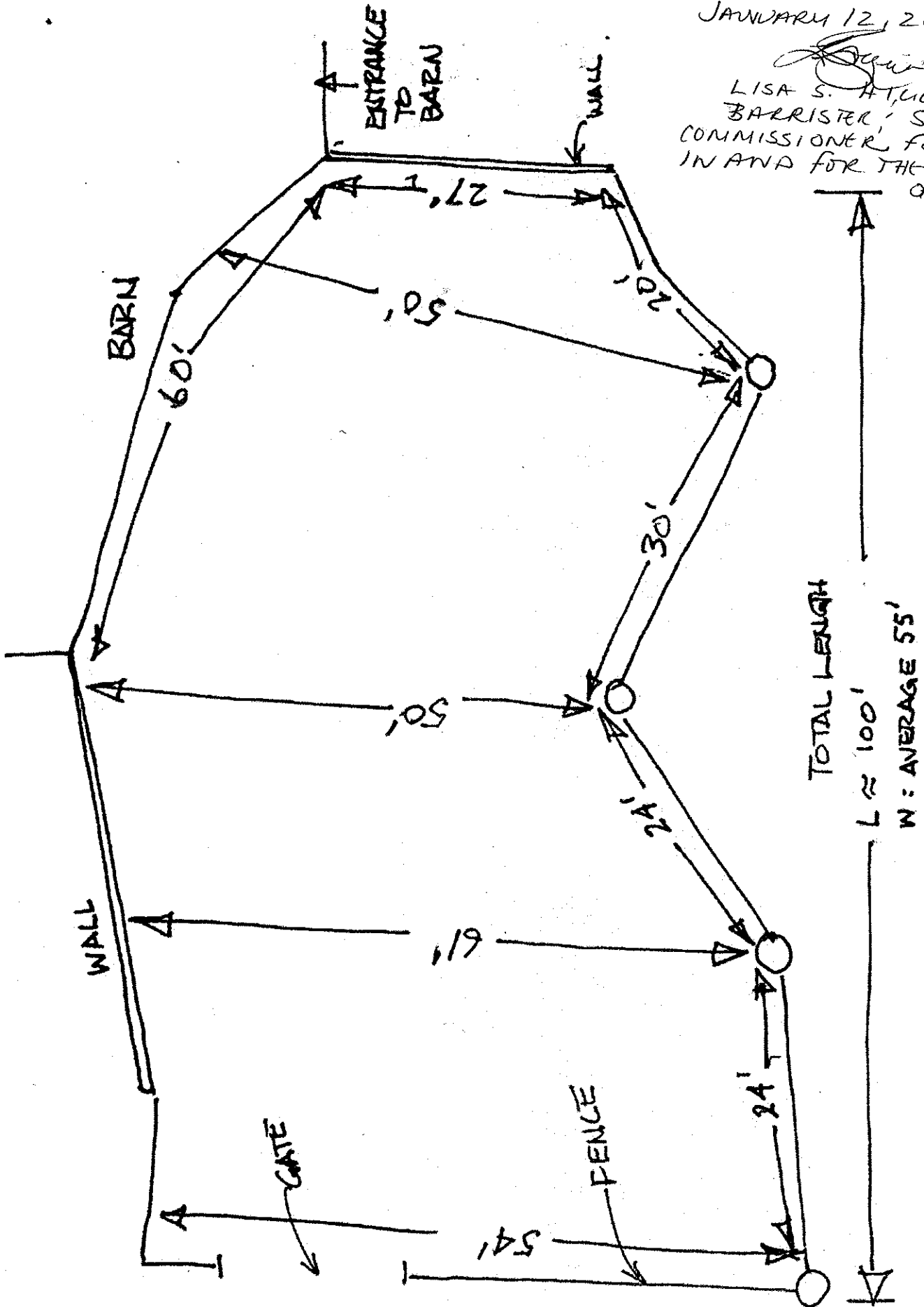
  
Tove Reece

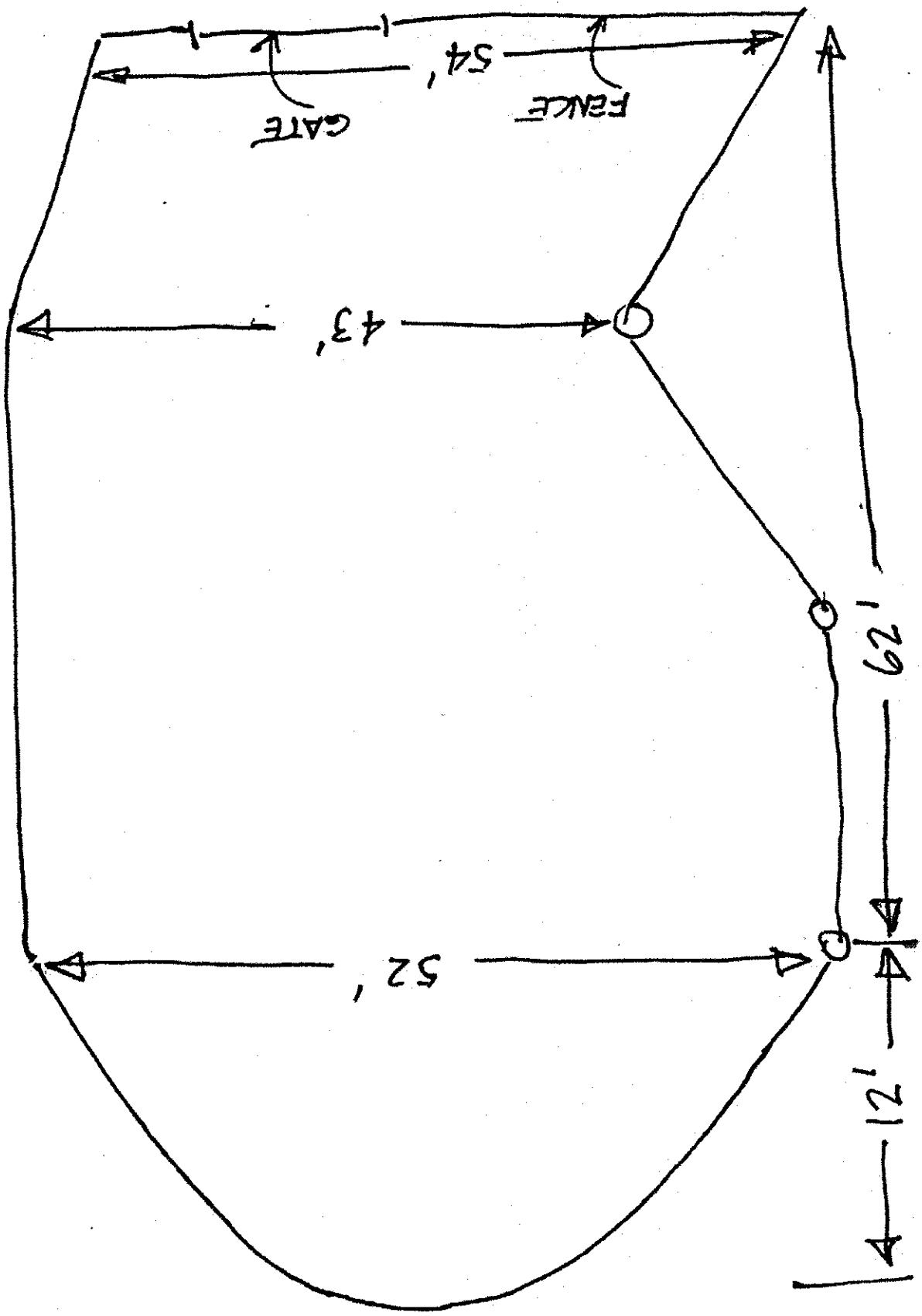


A Commissioner, etc.  
LISA S. HICKMAN  
BARRISTER / SOLICITOR  
COMMISSIONER FOR OATHS  
IN AND FOR THE  
PROVINCE OF ALBERTA

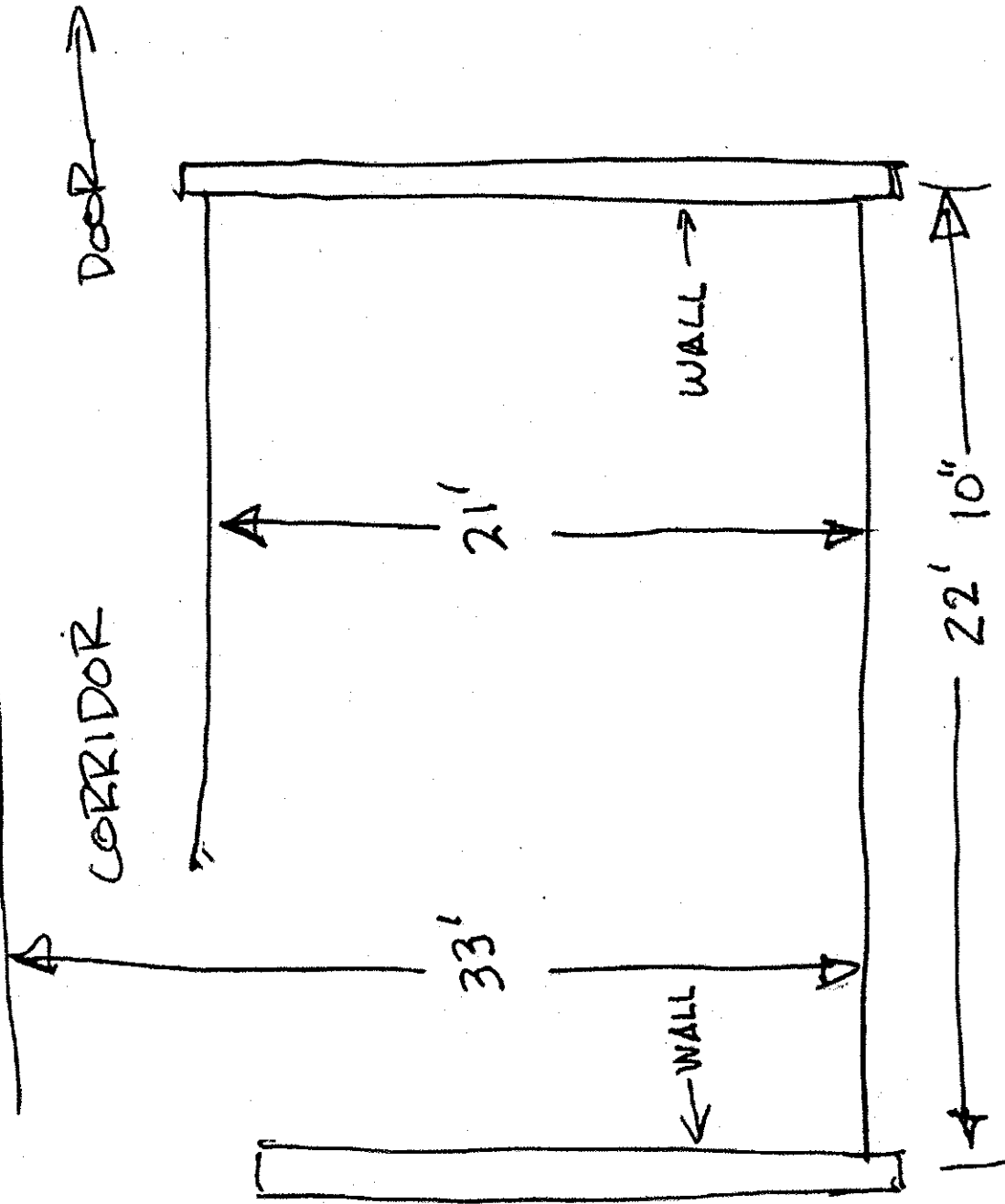
EXHIBIT "A"  
 TO THE AFFIDAVIT OF  
 TOVE REESE DATED  
 JANUARY 12, 2010

*Lisa S. Atulman*  
 LISA S. ATULMAN  
 BARRISTER, SOLICITOR  
 COMMISSIONER FOR OATHS  
 IN AND FOR THE PROVINCE  
 OF ALBERTA.





BARN CAGE/EXAMINATION



BARN MAIN

CORRIDOR

← DOOR

WALL →

33'

21"

40' 5"

