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Hon. Tom Vilsack
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

**Re: Recommendations concerning “The Great Bull Run” in relation to the
Animal Welfare Act**

Dear Secretary Vilsack:

The Committee on Animal Law of the New York City Bar Association has become aware of a series of commercial bull-running events, known as “The Great Bull Run,” that are being conducted throughout the United States.¹ These events enable participants, for a fee, to enter a racetrack where up to twenty-four 1,500-pound bulls are released to “sprint down the track in about three minutes” alongside the participants for entertainment. As noted by the organizers of this event, “there is no physical barrier between the runner and the bulls.”² These events have already occurred in three U.S. cities, and several other events are scheduled for this year, in around eight states across the country.

Based on our review of the activities involved in “The Great Bull Run,” we note that these events appear to violate the Animal Welfare Act (the “AWA”), posing serious dangers to the bulls and humans involved. Accordingly, we recommend that the Secretary of Agriculture take all necessary steps to address the animal welfare and public safety concerns associated with these events as mandated by the AWA.³

¹ The Great Bull Run: About, <http://www.thegreatbullrun.com/about> (last visited Mar. 11, 2014).

² The Great Bull Run: Frequently Asked Questions, <http://www.thegreatbullrun.com/faq/>.

³ The AWA requires the Secretary of Agriculture to notify the Attorney General “[w]henver the Secretary has reason to believe that any . . . exhibitor . . . is placing the health of any animal in serious danger.” AWA § 2159.

As background, the AWA and implementing regulations apply, *inter alia*, to “exhibitors” of animals.⁴ The organizers of the Great Bull Run events appear to qualify as “exhibitors” under the AWA as they indisputably exhibit the bulls “for compensation,” charging participants up to \$75 to be chased by the bulls.⁵ They also purchased the bulls “in commerce” from a ranch in Kentucky.⁶ Exhibiting the bulls in various states also affects commerce. To date, these Great Bull Run events have taken place in Georgia, Virginia, and Texas, and are scheduled in several other states over the next twelve months.

A review of the promotional materials of the Great Bull Run events further suggests that these events may violate the AWA. The AWA prohibits exhibitors from “placing the health of any animal in serious danger.” *See* AWA § 2159.⁷ The Great Bull Run events appear to violate the AWA by forcing panicked bulls to charge around a narrow track, where they risk collision with barriers, other bulls, and hundreds of participants. At each event, the bulls are first herded by horseback riders⁸ into “large venues like horse racing tracks.”⁹ From there, they are driven into a crowd of “up to 1,000” humans and more than 20 other bulls.¹⁰ These events may occur, utilizing the same bulls, up to six times a day.¹¹ As acknowledged by the Great Bull Run organizers, the bulls must be frightened or agitated into running, as they “won’t do it willingly.”¹² When they run, the bulls risk injury from collision with other frightened stampeding bulls as well as with the human participants in the event.

The Great Bull Run events also present significant safety risks to the thousands of human participants, spectators, volunteers, and workers involved in each event. Participants are invited to enter a racetrack where up to twenty-four 1,500-pound bulls are released to “sprint down the track in about three minutes” alongside the participants for entertainment. There are little to no safety precautions to prevent collisions between the participants and the bulls, as “there is no physical barrier between the runner and the bulls.”¹³ As, the Great Bull Run event organizers acknowledge, “running with live bulls is an inherently dangerous activity;”¹⁴ “[t]hese bulls aren’t deer at a petting zoo; they WILL run you over if you’re in their way.”¹⁵ This danger is further

Once notified, the Attorney General may then seek a temporary restraining order or injunction to prevent the exhibitor from violating the AWA further. AWA § 2159.

⁴ The term “exhibitor” as used in the AWA “means any person . . . exhibiting any animals, which were purchased in commerce or the intended distribution of which affects commerce, or will affect commerce, to the public for compensation,” including “carnivals, circuses, and zoos.” AWA § 2132(h).

⁵ The Great Bull Run: Houston – January 25, <http://www.thegreatbullrun.com/events/houston-2013/> (last visited Mar. 11, 2014).

⁶ Barry Bearak, “For Thrill Seekers, a Bull Run With a Different Hook,” N.Y. Times, Feb. 12, 2013, <http://www.nytimes.com/2013/11/17/sports/for-thrill-seekers-a-bull-run-with-a-different-hook.html> (last visited Mar. 11, 2014).

⁷ Notably, the Great Bull Run may also violate state anti-cruelty laws. For instance, in Virginia (where an event is scheduled in August 2014) a person who “overdrives” or “ill-treats” an animal is guilty of a Class 1 misdemeanor. *See, e.g.*, VA ST § 3.1-796.122(A).

⁸ Associated Press, “Georgia Bull Run draws 3,000 daredevils,” Oct. 19, 2013, <http://news.yahoo.com/ap-photos-georgia-bull-run-draws-3-000-215339601.html> (last visited Mar. 11, 2014).

⁹ *See* The Great Bull Run: FAQ.

¹⁰ *See* The Great Bull Run: FAQ.

¹¹ The Great Bull Run: Houston – January 25.

¹² Mary Ann Tobin, “Florida Bull Run: Good business or sheer stupidity?,” Examiner.com, <http://www.examiner.com/article/florida-bull-run-good-business-or-sheer-stupidity> (last visited Mar. 11, 2014).

¹³ The Great Bull Run: Frequently Asked Questions, <http://www.thegreatbullrun.com/faq/> (last visited Mar. 11, 2014).

¹⁴ The Great Bull Run: Is Running with Bulls Safe?, <http://www.thegreatbullrun.com/faq/isnt-running-with-bulls-dangerous/>. *See also* Jim Caple, “Legal Wranglings,” ESPN.com, Aug. 24, 2013, http://espn.go.com/espn/story/_/id/9592857/bull-race-us-requires-bit-legal-wrangling (last visited Mar. 11, 2014).

¹⁵ The Great Bull Run: FAQ.

increased by the availability of alcohol to participants and event volunteers.¹⁶ To date serious injuries have occurred with respect to a number of participants at these events.¹⁷

Accordingly, we respectfully recommend that the Secretary of Agriculture take all necessary steps to address the animal welfare and public safety concerns associated with these events as mandated by the AWA.

Sincerely,



Christine Mott

¹⁶ The Great Bull Run: Volunteer, <http://www.thegreatbullrun.com/volunteer> (noting [that volunteers are provided with one free alcoholic beverage](#)); *id.* at The Great Bull Run: FAQ (noting that only “visibly intoxicated attendees will not be allowed to run”).

¹⁷ Charles Poladian, “The Great Bull Run: America Finally Gets To Run With The Bulls,” *International Business Times*, Aug. 29, 2013, <http://www.ibtimes.com/great-bull-run-america-finally-gets-run-bulls-1401717> (last visited Mar. 11, 2014) (noting that at the inaugural Great Bull Run event in Virginia, for instance, several participants were injured, “including two being treated for concussion-like symptoms and a third being sent to the hospital for more serious injuries”); Bearak, “For Thrill Seekers, a Bull Run With a Different Hook” (noting that at the second bull run in Georgia, around a dozen participants were treated by paramedics, and one participant was taken from the run with his pelvis broken in three places); Irving DeJohn, “Texas thrill seekers injured at Great Bull Run in Baytown,” *Daily News*, Jan. 27, 2014, <http://www.nydailynews.com/news/national/messed-bulls-horns-article-1.1592653> (last visited Mar. 11, 2014) (noting that at an event in Texas several participants were similarly injured, with at least one suffering a concussion and multiple lacerations). *See also* Gary Robertson, “‘Exhilarating’: 4,000 run from the bulls in US event modeled after Pamplona,” *U.S. News*, Aug. 24, 2013, <http://usnews.nbcnews.com/news/2013/08/24/20173252-exhilarating-4000-run-from-the-bulls-in-us-event-modeled-after-pamplona> (last visited Mar. 11, 2014).