

STATE OF NORTH CAROLINA

COUNTY OF WAKE

ANIMAL LEGAL DEFENSE FUND,
WAKE COUNTY, A North Carolina Body
Politic, and KELLI FERRIS, D.V.M.,

Plaintiffs,

v.

JANIE CONYERS,

Defendant.

IN THE GENERAL COURT OF JUSTICE
DISTRICT COURT DIVISION

2001 NO. 3173-33
07 CYS 17739

WAKE COUNTY, CSC

AFFIDAVIT OF KACIE SCHMITT

NOW COMES Kacie Schmitt, being first duly sworn and says as follows:

1. I am Kacie Schmitt and I am over the age of 18 years and competent to make this Affidavit and do so of my own personal knowledge.
2. I have personal knowledge of or am informed of and believe the facts set out in this declaration. If called upon, I could and would testify about the facts stated here.
3. I am a fourth-year veterinary student at the North Carolina State College of Veterinary Medicine. I am currently participating in clinical rotations at the Wake County Animal Shelter. In that capacity, I work with veterinarians in performing physical examinations of animals; spaying and neutering animals; administering tests, vaccinations, and medications; and performing other veterinary tasks. I have a Bachelor of Science in Poultry Science from North Carolina State University.

4. On Friday, October 19, 2007, I worked with Dr. Kelli Ferris in evaluating an animal neglect and cruelty situation at the residence of Janie Conyers, 8252 Holly Springs Rd., Raleigh, NC 27606. I assisted Dr. Ferris in documenting the conditions in the home and removing the animals.
5. The first thing that struck me when I entered the home was the definite odor of urine and feces. I observed feces and urine throughout the house, on the floor and the furniture. Although the odor was strong upstairs, it almost doubled when I walked downstairs. It made my nose burn slightly and my chest feel tight.
6. Most of the dogs had matted feces in their fur, much of it concentrated on their feet and around their perianal area. This matting is painful for the dogs because it constantly pulls their fur and irritates the skin beneath it, much as it would pain a human to have her hair constantly pulled. Besides the acute pain of having their fur pulled, the matting is also painful because of the direct contact between (a) the toxins and irritants in the urine and feces soaked into their fur and (b) the dogs' skin. This condition was the result of neglect that could have been prevented with simple care of the dogs.
7. A majority of the dogs had urine and fecal staining on their skin, because they had been forced to walk through and rest in their own excrement for an extended period of time.
8. Many of the dogs had matted fur around their eyes, which constantly irritated their corneas. This constant irritation by the hair likely caused many of the healed corneal ulcers we observed in the dogs. Corneal ulcers are caused by scratches on the eye's surface and are very painful. This condition occurred because of severe

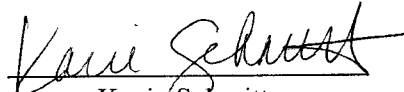
14. I believe that the dogs were experiencing physical pain and suffering, and that, if they were left in the filth at Ms. Conyers house, their conditions would deteriorate.
15. The ammonia levels in the house were so high that they caused a burning sensation in my nose. High levels of ammonia suppress the immune system and increase dogs' susceptibility to disease.
16. I believe that if not removed, inevitably the dogs had the potential to become ill with diseases including worsening of dental disease, septicemia (blood poisoning), and deadly bacterial infections such as endocarditis,, glomerulonephritis (a type of kidney disease), pneumonia, and chronic bronchitis.
17. I also observed dogs with hereditary diseases who Ms. Conyers was using to breed more dogs. Two conditions I noticed were juvenile cataracts and cryptorchidism (a condition in which the testicles do not descend into the scrotum). Unsterilized dogs with cryptorchidism are far more likely to develop testicular cancer and other related problems than normal dogs. Dogs with these heritable conditions should not be bred.
18. I observed clutter everywhere in the house, including stacks and piles of blankets, stuffed animals, newspapers, books, magazines, food, figurines, and other things. Based on the accumulations of dust, trash, and feces, I do not think the home had been cleaned in years.
19. I saw feces in the kitchen. Dishes filled the sink, and there was rotten food, and an overflowing trash can. The refrigerator was filthy, with rust and dirt stains on

the outside and some kind of old gelatinous food material on the bottom of the inside door.

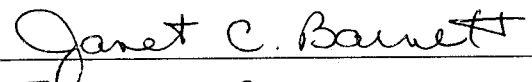
20. Stalagmites of feces approximately eight inches tall were piled up in two cages where parrots were living. The cage floors had accumulated layers of feed, fecal material, and feathers. The only water I saw in the bird cages was dirty. In my estimation, the cages had not been cleaned in any way for at least several weeks. The birds were very nervous, and shied away whenever anyone tried to touch them.

I declare under penalty of perjury that the foregoing is true and correct. Signed this 29 day of October, 2007, in Raleigh, North Carolina.

FURTHER THE AFFIANT SAYETH NOT.


Kacie Schmitt

Sworn to and subscribed before me this the 29th day of October, 2007.


JANET C. BARNETT, Notary Public
[Notary's Typed or Printed Name]

My Commission Expires: 03/27/2010