

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

NO. 07 CVD 17739

2007 OCT 31 P 3:37

WAKE COUNTY, CSC

AFFIDAVIT OF JEANNIE SHOOK

NOW COMES Jeannie Shook, being first duly sworn and says as follows:

1. I am Jeannie Shook 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 Lead Animal Control Officer for Wake County Animal Control, and have worked in the animal control field for eleven years.
4. As Lead Animal Control Officer, I supervise ten Animal Control Officers. I am involved in animal cruelty investigations performed by Wake County Animal Control. In the case of animal cruelty that merits more than a warning, I investigate and determine whether criminal charges are warranted.
5. As Lead Animal Control Officer, I oversee my department's enforcement of local

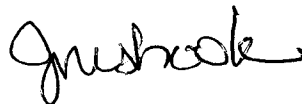
ordinances and state statutes governing animals.

6. I have been involved with between twenty-five and fifty investigations involving animal hoarding in my career in animal control. I have obtained significant knowledge and an understanding of animal hoarding through these cases and through working with veterinarians and others with experience in the field.
7. **The hallmark of an animal hoarding scene is large numbers of animals who are suffering from painful conditions, are in states of severe neglect, and are possessed by a person or persons who deny the problems. The environment and state of the animals at the Conyers residence presented a classic case of animal hoarding.**
8. Based on my experience with investigation and enforcement of the North Carolina anticruelty statutes, I believe the dogs at Ms. Conyers' property were the victims of animal cruelty under Section 14-360 and Section 19A-1(2) of the North Carolina General Statutes, because they had conditions that the veterinarians reported caused pain and suffering, and because the dogs were deprived of necessary sustenance. Specifically, I saw:
 - a. **All the dogs were living in a fetid and ammonia-filled environment that threatened their health;**
 - b. **Many puppies, who are especially sensitive to toxins, were being exposed to what I understand were extremely high levels of ammonia. This environment itself was dangerous to these puppies, as well as their nursing mothers;**

- c. **There was severe overcrowding of the dogs in the enclosures that did exist;**
- d. **The environment was infested with various types of insects, in large numbers. This created a situation that threatened its inhabitants with disease;**
- e. **Dogs are fastidious animals who depend on humans to care for them, and these dogs were forced to live in their own excrement, which caused them to suffer;**
- f. **The birds lived in putrid and insect-infested cages, with large piles of feces, indicating they had not been cared for in an extended period of time; and**
- g. **Many of the dogs had bad tooth decay and severe oral disease which I have been told by veterinarians is very painful.**

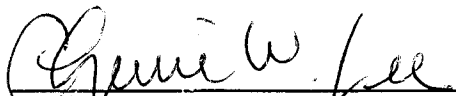
I declare under penalty of perjury that the foregoing is true and correct. Signed this 25 day of October, 2007, in Raleigh, North Carolina.

FURTHER THE AFFIANT SAYETH NOT.



Jeannie Shook

Sworn to and subscribed before me this the 25th day of October, 2007.



Cherrie W. Lee, Notary Public
[Notary's Typed or Printed Name]

My Commission Expires: 3/5/10

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