

STATE OF NORTH CAROLINA  
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE  
DISTRICT COURT DIVISION

NO. 07 CVD 17739

2007 OCT 31 P 3:55  
WAKE COUNTY, CSC

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

Plaintiffs,

v.

JANIE CONYERS,

Defendant.

**AFFIDAVIT OF BETSY SIGMON, D.V.M.**

NOW COMES Betsy Sigmon, D.V.M., being first duly sworn and says as follows:

1. I am Betsy Sigmon 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 licensed veterinarian, and have been practicing veterinary medicine for twenty-six years. I am the owner and Hospital Director of Creature Comforts Animal Hospital in Cary. Seventy percent of my patients are dogs, and I see approximately 3200 patients each year.
4. I have been the chairperson and a Board Member of the Judicial Council of the American Veterinary Medical Association, and also served on the Board of Trustees of the Morris Animal Foundation. I am currently on the Board of Trustees of North Carolina State University College of Veterinary Medicine. I

am also an adjunct professor teaching primary care practice at North Carolina State University College of Veterinary Medicine.

5. On Sunday, October 21, 2007, I visited Wake County Animal Control in order to evaluate the medical conditions of a number of dogs who I understand were removed from the residence of Janie Conyers. Along with one other veterinarian, I assessed the dogs to determine what the cost would be for the absolute minimum care that would take the dogs out of a state of pain and suffering. No special or elective procedures were considered – only those necessary to deliver them to a resting state in which they were no longer in distress.
6. When I went to the shelter, I was shocked by the number of dogs Ms. Conyers had, and I was appalled by the prolonged and extensive pain and suffering these dogs were experiencing. Specifically, I saw the following in the dogs I examined:
  - a. All of the dogs were in some state of pain and suffering, and the degree depended mainly on age – that is, the older the dogs, the worse their pain, and the longer they had been suffering. They appeared to have been in some states of oral pain for most of their lives, with the older dogs having spent years in this situation without any relief;
  - b. Most of the older adult dogs I examined had been in daily pain and suffering for an estimated four years or more;
  - c. The dogs were in these progressive stages of pain and suffering because of what I believe was a complete lack of routine, preventative health care for most of their entire adult lives;

- d. Dogs experience pain as much as humans do, and have the same type of response, physically and psychologically, to extended pain;
- e. All of the adult dogs' mouths and teeth were afflicted with various stages of dental disease that causes pain and suffering as well as infection;
- f. In many cases the degree of disease was so great that the dogs had an infection of the mandibular (lower) jaw bone known as osteomyelitis. Because of this condition, many of the dogs' lower jaws were actually being destroyed and disintegrating;
- g. Osteomyelitis is an extremely painful condition in dogs, just as it is in humans;
- h. Many of the dogs had matted hair, containing feces and old urine embedded in the hair, in various parts of their bodies;
- i. Many dogs had matted hair stuck to their teeth. In some cases, their hair, combined with years of tartar and decay, was acting as a glue to hold their teeth to their jaw; and tooth sockets.
- j. The dogs' hair adhered to their teeth because of a complete lack of grooming, and because the dogs were chewing themselves to rid themselves of fleas and scratch their skin. It is also possible that some of the dogs were involved in compulsive chewing behaviors caused by long-term confinement with no activity;
- k. Many of the dogs had their hair actually stuck to their sensitive corneas, eyelids, and periocular tissue (around the eyes), fixed in place because of eye

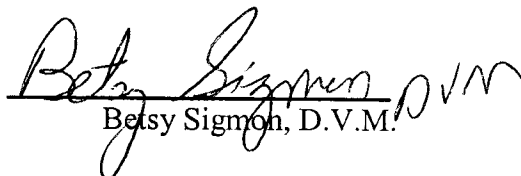
discharge to which the hair became affixed. This led to serious bacterial infections in the dogs' eyes and surrounding skin;

- i. The corneal scarring and damages I saw could have been caused by the matting in the dogs' hair or by exposure to ammonia in the environment at Ms. Conyers' residence;
- m. Eye injuries like these cause significant discomfort and a high level of pain. The dogs obviously had these problems for weeks to months, if not years. With proper routine attention and care, these problems would never have occurred;
- n. The male dogs had hair matted and affixed directly to their penises because of a lack of daily care and simple grooming. This made it clear to me that these dogs had never been properly cared for;
- o. The matted hair on the dogs' penises led to what I expect was localized infections. These infections could also lead directly to kidney infection, kidney failure, and death, if the infection moved up the urinary tract;
- p. The matted hair on some of the dogs' penises prevented them from urinating in the normal fashion, and caused them to urinate on themselves. Dogs are fastidious animals who make every effort to avoid their own excretions, so this condition caused psychological and physical distress to every dog affected;
- q. The male dogs urinating on themselves had an irritation of the skin (known as "scalding" because it burns the skin) and a high likelihood of infection from the urine; and

- r. There was an overwhelming degree of flea infestation, which is highly abnormal for a group of dogs living inside. This indicates an unhealthy and unsanitary environment with a lack of established preventative flea control measures to lower the risk of contracting diseases carried by fleas. .
7. I estimate that it would cost approximately \$27,000 in veterinarian's fees and costs to simply eliminate the pain and suffering experienced by the forty dogs I personally examined. This estimate is based on a conservative evaluation of the veterinary care that is absolutely necessary to achieve this minimal goal. This does not include calculations for ongoing eye care or medical care that may be needed, or for the crisis management that was required because of the debilitated state of the animals when they were taken.
8. This is an estimate for only the forty dogs my colleague and I assessed. Based on the number of dogs seized, a conservative estimate of the costs of care, only to get them out of pain and suffering, is \$74,000.
9. This estimate does not include the cost of caring for the birds seized from Ms. Conyers' residence.

I declare under penalty of perjury that the foregoing is true and correct. Signed this 24<sup>th</sup> day of October, 2007, in Cary, North Carolina.

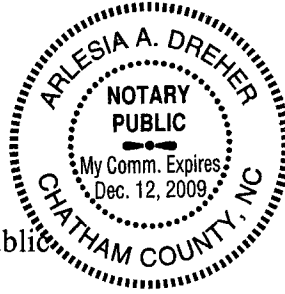
FURTHER THE AFFIANT SAYETH NOT.

  
Betsy Sigmon, D.V.M.

Sworn to and subscribed before  
me this the 24 day of October, 2007.

Arlesia A. Dreher

Arlesia A. Dreher, Notary Public  
[Notary's Typed or Printed Name]



My Commission Expires: December 12, 2009

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