

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
DISTRICT COURT DIVISION

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OCT 31 P 3:33
WAKE COUNTY, CSC

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

Plaintiffs,

AFFIDAVIT OF MICHAEL WILLIAMS

v.

JANIE CONYERS,

Defendant.

NOW COMES Michael Williams, being first duly sworn and says as follows:

1. I am Michael Williams 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 the director of the Wake County Animal Care, Control, and Adoption Center. I have a Master's in Public Health from the University of North Carolina at Chapel Hill and a Bachelor of Science in Zoology from North Carolina State University. Prior to my current position, I was in emergency management for Wake County for three-and-a-half years and a paramedic for Wake County for five years.
4. On Friday, October 19, 2007, I accompanied an animal cruelty investigator, a deputy, and several animal control officers to the residence of Janie Conyers,

8252 Holly Springs Rd., Raleigh, NC 27606, to execute a warrant related to reports of animal cruelty and neglect.

5. We knocked on the front door of the house and waited several minutes, but no one came to the door. Animal Control Officer Jeannie Shook walked around to the rear of the house, then returned a few minutes later with Douglas Matney, who I knew from a prior animal cruelty investigation, which is described in more detail below. Mr. Matney was carrying two full garbage bags toward his truck. The bed of his truck was filled with other garbage bags. Mr. Matney told us that he was on the property helping to clean up, but that he did not know whether Ms. Conyers was at home.
6. It is my belief that during the time before we gained entry to the residence, Mr. Matney and Ms. Conyers were frantically cleaning the house to remove evidence of animal cruelty and neglect.
7. Inside, the house reeked of ammonia and canine feces. I immediately saw small dogs everywhere; there were too many to count. Even from my cursory glances at the animals, I could tell that they had fecal material stuck to their fur.
8. One dog in particular was obviously blind and could barely stand up. His tongue was hanging out of his mouth, and I later learned that his jaw had almost disintegrated. He was caged by himself in the basement, and sat in his cage, shaking. He reminded me of a person in a nursing home at the end of his life. He had some substance stuck to the underside of his fur; it was evident that he could not stand up to use the bathroom and had consequently soiled himself repeatedly.

9. In the basement, there were two bird cages that obviously had not been cleaned in months. Under the birds' perches, there were mounds of feces several inches high that looked like miniature volcanoes, piled high and ashen-colored. Cockroaches were crawling through the old food, feathers, and other debris in the bottom of the cage.
10. I observed cockroach feces throughout the basement. In one room, there was a pan catching condensation from a window air conditioner, but it had clearly not been emptied in a long time, as I saw mosquito larvae swimming in the filthy water.
11. I also observed extensive amounts of clutter throughout the house, which I understand to be a symptom of hoarding disorder.
12. The kitchen was very cluttered, with food pouring out of shelves. There were dirty dishes in the sink, including a pot with standing water that had dead roaches in it. There was dog feces on the kitchen floor.
13. At one point, Ms. Conyers told me that the dogs were dirty because they had gone outside in the mud. The outside dog runs, however, showed no signs of recent use, and it was clear to me the dogs were covered in dried feces, not mud.
14. As director of Animal Control, I was also involved in a prior, and, as it turns out, related, animal cruelty investigation against Douglas Matney and Louann Smith based on their operation of a puppy mill. Puppy mills are intensive commercial breeding operations that house dogs in industrial and unsanitary conditions. In early 2007, we received complaints about serious animal husbandry and environmental problems with respect to the kennel on Ms. Smith's property,

which housed between 300 and 400 dogs. Mr. Matney and Ms. Smith had been breeding dogs for sale in their business Aristocratic Pets. Our investigation found crowded and unsanitary conditions; circumstances of animal cruelty similar to those found at Ms. Conyers' residence; and numerous zoning violations, such as an illegal septic tank draining into a watershed that served as a water source for several communities, illegal temporary buildings, and a violation of the zoning limit of five adult animals per parcel. Ms. Smith and Mr. Matney exceeded that amount at least sixty times over.

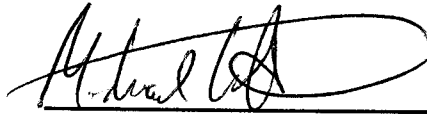
15. Soon thereafter, we received another complaint of animal cruelty that someone was selling neglected dogs out of his house. This was Mr. Matney, in whose house we found 59 dogs, mostly puppies. A "Puppies for Sale" sign was posted in front of his house, with Ms. Smith's telephone number on it. Inside Mr. Matney's house, we found feces-covered dogs, some of whom had had their ears crudely mutilated. Mr. Matney was charged with fourteen counts of animal cruelty and neglect under the county animal control ordinance.
16. To settle the zoning and animal control violations, Ms. Smith and Mr. Matney entered into an agreement with the County Attorney's office to remove the animals from the county. They represented to the County Attorneys that they had removed all but fourteen of the dogs from the county, which I later learned was false.
17. Mr. Matney told me that thirty-nine of the dogs at Ms. Conyers' house belonged to him. His statement is corroborated by the fact that some of the dogs rescued

from the house were Yorkshire terriers and miniature schnauzers, whereas I understand Ms. Conyers only bred toy poodles.

18. It is my belief that Mr. Matney was in violation of his agreement with the County, and that he and Ms. Smith were hiding their dogs at Ms. Conyers' house in order to maintain their breeding operation in Wake County.

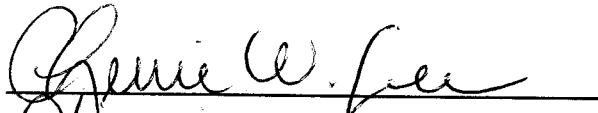
I declare under penalty of perjury that the foregoing is true and correct. Signed this 25 day of October, 2007, in Raleigh, North Carolina.

FURTHER THE AFFIANT SAYETH NOT.



Michael Williams

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