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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

OCT 19 2006

Attorneys for Riverside County Department of Animal Services
(erroneously sued as Riverside Animal Control)

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE

11	Barbara Ryan,)	Case No. RIC 457957
12	Plaintiff,)	DECLARATION OF LESLEY HUENNEKENS
13	v.)	DATE: 10/19/06
14	Riverside Animal Control,)	TIME: 8:30 a.m.
15	Defendant.)	DEPT: 2
16)	JUDGE: Honorable Dallas S. Holmes
17)	

18 I, Lesley Huennekens, the undersigned, declare as follows:

19 1. I am currently employed as an Animal Control Officer with the Riverside County
20 Department of Animal Services. My duties as an Animal Control Officer include, among other duties,
21 investigating animal cruelty cases, impounding animals, and working cooperatively with other law
22 enforcement groups when joint action is required.

23 2. On Friday September 29, 2006, I responded to a call to assist City of Hemet Code
24 Enforcement on the property located on the 800 block, Hemet, Riverside County, California. I arrived at
25 the location and met with City of Hemet Code Enforcement Officer Americo Giodano. He needed me to
26 impound the animals inside the house as it was going to be posted as unsafe to occupy due to unsanitary
27 conditions. He informed me that according to the animals' owner, Barbara Ryan, there were four dogs
28 and seventeen cats in the house.

1 3. Officer Giordano and I entered the house and I was immediately overcome by the stench of
2 urine and feces. The first room we entered was the living room. The room was full of feces and urine.
3 Piles of old newspapers, plastic bags, empty cat food cans, clothing, cardboard boxes, and various other
4 kinds of trash littered the room. In some places, the debris was several feet deep. In addition, the room
5 contained dirty animal carriers and a dried up Christmas tree. I could visibly see feces and cockroaches
6 on the walls. The room also included terrariums filled with mice as well as loose mice running around the
7 room. (True and correct photographs of the condition of the property are attached hereto and incorporated
8 herein by reference as Exhibit 1; See photograph nos. 1-7 for the condition of the living room. Please
9 note there was a camera malfunction causing the date to read "4/21/2004" but the photographs were taken
10 on September 29, 2006.)

11 4. Next, Officer Giordano and I entered the kitchen. Located in a lower kitchen cabinet was a
12 Rottweiler mix tied so tightly inside the cabinet, the dog could not move. There was no food or water
13 visible. The dog appeared very thin and fearful when I approached. After securing the dog inside my
14 truck, I returned to the house to impound the other dogs. The stench in the house made me nauseous and
15 burned my eyes, nose, and throat. Upon returning to the kitchen, I heard barking from behind a door
16 secured by numerous bungee cords and some kind of metal cage material. Officer Giordano and I
17 discovered two dogs cowering in the corner of what appeared to be a pantry. The two dogs were covered
18 in urine and feces. There was so much urine and feces that the drywall inside of the pantry was
19 disintegrating and caused urine burns on the pads of the dogs' feet. The pantry the dogs were in had no
20 food, water or light. (Please see Exhibit 1 photographs nos. 8-14.)

21 5. After securing the two dogs, Officer Giordano and I made our way through a hallway filled
22 with trash, empty cat food cans, and clothing. We entered another room and found two dogs fighting over
23 a dead cat. The urine, feces, and decaying flesh stench was overwhelming. Again, the room was covered
24 in trash, empty animal cans, feces, and filthy animal carriers. The drapes were soaked and stained with
25 urine. When I entered the room, the two dogs fled into a closet. The door on the closet was off its hinges
26 and appeared to be soaked in urine. The closet floor was also covered in feces and urine. There were
27 holes in the walls and the dogs ran back and forth through them trying to get away from me. I also
28 observed at least ten cats running loose in the room. (Please see Exhibit 1 photographs nos. 15-27.)

