

1 In addition to the rodent droppings, there were a number of days that I would
2 arrive at the kennel and the inside of the house was filled with dog urine and droppings.
3 In the front room alone, I would estimate at any given time there were between 15-30
4 dogs living on the floor in group pens and individual pens.

5 The dogs that lived in cages were often found sitting for hours in their own waste
6 with water bowls filled with urine and feces. Medical equipment such as syringes were
7 often found on the floor, under filing cabinets soaked in urine. The filing cabinets and
8 drawers that housed supplies were almost always covered with dog urine and were not
9 cleaned on a regular basis. On some Saturdays, the inside of the kennel was so
10 overgrown with items that had no "home" that you could not make a path through the
11 main room to the kitchen to clean up, get water, etc.

12 At one point during my tenure, I worked with Kimi Peck to set up an
13 intake/adoption/medical records folder. I made a folder for about 80% of the dogs living
14 in the kennel and put whatever paperwork we could find at the time in those folders. To
15 my knowledge, the system was never used again and at one point, the mice problem was
16 so bad, they were living in the filing cabinet and chewing through the folders.

17 My goal was to create a system by which she could track incoming dogs, file
18 medical records and identify dogs that were adopted. On more than one occasion, I
19 received communication from families that had adopted a dog from Chihuahua Rescue
20 asking for medical records that they were promised and never received. Since records
21 were not kept, there was no schedule of what dogs needed medication and when they
22 needed medication which likely resulted in missed doses for many of the dogs.

23 When I began as a volunteer, I was told that the animals in the back were mostly
24 those with behavioral issues and that those were the dogs Kimi Peck worked with on a
25 one on one basis. While I was not at the kennel on a round the clock basis, in the 8
26 months I was a volunteer, I never once saw Kimi Peck work with any of them. Nor did I
27 ever see her take those dogs out for regular exercise and it was only on Saturdays when
28 other volunteers offered to walk some of the dogs that they were taken out.

1 For most of the time I volunteered at Chihuahua Rescue, the dogs had little or no
2 protection from the elements. In the winter months, often times it was so cold and the
3 dogs had few blankets or wet blankets. In the summer, there were extremely hot days
4 where dogs had little or no water and no shade.

5 Inside the house, the dogs that were caged were rarely taken out. One dog
6 (Chukka), was deemed partially paralyzed due to an injury. He was rarely allowed to be
7 seen for adoption. However, after extensive convincing, she allowed Chukka to be
8 adopted into a good home. Fortunately, Chukka has been given the chance to learn to
9 walk again and is doing fantastic. He's actually walking on his own and is fairly active.

10 The unfortunate part of this story is that most dogs are not this lucky. There were
11 older dogs that good people wanted to adopt that she refused to let go, claiming they were
12 too ill or too unstable to be adopted out and that no one could give them the kind of care
13 she could. The dogs Ms. Peck was particularly fond of seemed much more likely to
14 remain there and not be put up for adoption while she found reasons they could not be
15 adopted.

16 On more than one occasion, I witnessed Ms. Peck dispense medication to dogs or
17 give medication to someone who had a sick dog without the consultation of a licensed
18 veterinarian.

19 During my volunteer time, I attended adoptions event almost every Saturday and
20 also attended two outreach fairs hosted by Best Friends Animal Sanctuary. The process
21 was to review applications immediately following the adoption events and contact
22 approved applicants to set up home checks. Kimi Peck had the final say on all
23 adoptions and her adoption rate was very low. Many strong candidates were
24 discriminated against based on income, age, race, etc. even when volunteers indicated
25 they believed the home to be suitable and certainly worthy of a home check if there was a
26 question. She regularly told prospective adopters that certain dogs were unavailable for
27 adoption for reasons that were often not true, and turned down applications for special
28 needs dogs based on some of the above mentioned criteria.

1 Consistently, she lost applications, failed to return phone calls and missed
2 scheduled home checks without even calling the potential adopter. She had no filing
3 system for applications and often times left them in her car where they were often ruined
4 or thrown away when the car was cleaned out. Often times it took more than 2-3 weeks
5 to deliver a dog after an application had been approved and on more than one occasion, I
6 was with her when she was more than 2-3 hours late for a scheduled visit. She often
7 claimed she was at another emergency when in fact she was having dinner or shopping.

8 Ms. Peck enlisted the help of volunteers to work at the kennel but failed to provide
9 them with any paperwork, training, etc. If a volunteer ever dared to exert some authority
10 in questioning her business practices, her treatment of the animals, operational questions,
11 etc. they were usually told not to come back. She turned away good volunteers who
12 wanted to help her with the animals, and help her regain control of the chaos at the
13 kennel. She regularly started rumors about her volunteers when she was mad at them,
14 even going so far as to falsely refer to one of them as a child molester behind his back.

15 Kimi Peck continues to take in dogs when it is not in the best interest of the other
16 dogs in her care and does so with reckless abandon. No one wants to see an animal
17 suffer, but while she believes she's saving them all, for many, she's condemning them to
18 a life in a 2'x 2' crate simply because she does not have the time, nor the adequate
19 resources to care for them all properly.

20 I declare under penalty of perjury under the laws of the State of California that the
21 foregoing is true and correct, and that this declaration is executed in [REDACTED]
22 County, on [REDACTED], 2005.

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25 DEVON MILLER
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