

STATE OF NORTH CAROLINA  
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE  
DISTRICT COURT DIVISION

NO. 09CV017739

FILED  
2007 OCT 31 P 3:55  
WAKE COUNTY, N.C.

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

Plaintiffs,

v.

JANIE CONYERS,

Defendant.

**AFFIDAVIT OF KAREN LARSEN**

NOW COMES Karen Larsen, being first duly sworn and says as follows:

1. I am Karen Larsen 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 have been an Animal Control Officer for nine years, and am currently an Animal Control Officer in Wake County.
4. As an Animal Control Officer, I am authorized to and do enforce local ordinances and state anticruelty laws; impound stray, sick and abandoned animals; work with law enforcement collaboratively on cruelty cases; and seize animals who are the subjects of cruelty in cooperation with animal cruelty investigators and law enforcement.
5. I am also authorized to investigate suspected animal cruelty, seize animals subject to cruelty (which I do in collaboration with law enforcement), and enforce the

anticruelty laws. I receive regular training as an Animal Control Officer, and have taken classes focusing on animal cruelty detection and investigation.

6. On Thursday, October 18, 2007, Wake County Animal Control received reliable information about a situation of potential animal cruelty being committed to over 100 dogs at the home of Janie Conyers, 8252 Holly Springs Road, Raleigh.
7. Based on the information we received, and prior reports, we suspected that Ms. Conyers was an animal hoarder -- someone who commits multiple acts of animal cruelty through the knowing neglect and disregard of the health and safety of large numbers of animals. In my job as Animal Control Officer, I have been involved in prior hoarding investigations as well.
8. I went to Ms. Conyers' premises in order to investigate the allegations. I was accompanied by a police officer and other animal control personnel.
9. When we arrived at Ms. Conyers' residence, she was inside the residence but refused to allow us entry despite numerous attempts at contacting her by knocking and banging on her front door.
10. At least fifteen minutes went by between the time we first arrived at the residence and when we actually located Ms. Conyers. Ultimately we discovered Ms. Conyers and another individual who were removing large bags of waste from the residence. I believe the bags of waste contained large amounts of dog feces as well as newspaper saturated and filled with feces and urine, presumably from dogs housed in the residence. When we first located the other individual, Doug Matney, he was removing garbage bags from the house. He first lied to us and

told us that Ms. Conyers was not home. Shortly thereafter, she emerged from her house. At that point, we finally gained access to the residence.

11. Inside the residence we found over 110 dogs who were all suffering from what I believe is animal cruelty under both Section 19A-1(2) and Section 14-360 of the North Carolina General Statutes. I base that belief on the following:
  - a. The floors and walls of the house were covered with old and new dog feces and urine, and the dogs were living in this unhealthy environment;
  - b. Puppies and their mothers were trying to nurse and live within this environment;
  - c. The smell of ammonia from new and old deposits of urine and feces was overpowering. Ammonia is damaging to all living beings, and can harm eyes and other sensitive areas. The danger of ammonia exposure is especially high for small puppies whose immune systems are not fully developed;
  - d. Insect infestation was clear throughout the house, which would also endanger the dogs and especially the puppies;
  - e. Many of the dogs had scalding, that is, their sensitive skin was burned, presumably by long-term lying on urine and feces-covered surfaces; and
  - f. The veterinarians informed me of a number of serious medical problems that indicated the animals were in pain and had been neglected for a long period of time.
12. Based on the foregoing and my knowledge of hoarding, I believe Ms. Conyers displays all the signs of an animal hoarder.

