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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF RIVERSIDE

DAVID KIRK, LISA BLODGETT,
TIFFANI LOBUE,

Petitioners,

vs.

ERIN GETTIS, in her official capacity as
Director, Riverside County Department of
Animal Services; RIVERSIDE COUNTY
DEPARTMENT OF ANIMAL SERVICES;
COUNTY OF RIVERSIDE; JEFF VAN
WAGENEN, in his official capacity as
County Executive Officer, County of
Riverside; DOES 1 through 10, inclusive,

Respondents.

CASE NO.: CVPS2405127

**SECOND AMENDED PETITION FOR
WRIT OF MANDATE; SECOND
AMENDED COMPLAINT FOR
DECLARATORY AND INJUNCTIVE
RELIEF**

1. Writ of Mandate for Violations of Civil Code §1834.4(a), Penal Code §599d, and Food & Agriculture Code §17005(a);
2. Writ of Mandate for Violations of Civil Code §1834.4(b) and Food & Agriculture Code §17005(b);
3. Writ of Mandate for Violations of Civil Code §§1834 and 1846 for Failure to Provide Animals with Necessary And Prompt Veterinary Care, Nutrition, and Shelter, and to Treat Them Kindly;
4. Writ of Mandate for Violations of Riverside County Code of Ordinances §6.08.120 – Altered and Unaltered Animals;
5. Writ of Mandate for Violations of Food & Agricultural Code §32003;
6. Taxpayer Suit Pursuant to Code Civ. Proc. §526a and Common Law – Hassen Contract;
7. Taxpayer Suit Pursuant to Code Civ. Proc. §526a and Common Law – Gettis Employment Contracts; and
8. Taxpayer Suit Pursuant to Code Civ. Proc. §526a and Common Law – RCDAS Employee Nepotism

Petitioners David Kirk, Lisa Blodgett and Tiffani LoBue bring this Second Amended Petition for a Writ of Mandate; Second Amended Complaint for Declaratory and Injunctive Relief, pursuant to *Code of Civil Procedure* §1085 and *Civil Code* §525, *et seq.*, and allege as follows against Respondents Erin Gettis (“Gettis”), in her official capacity as the Director of Respondent Riverside County Department of Animal Services, Respondent Riverside County Department of Animal Services (“RCDAS”), Respondent County of Riverside, Respondent Jeff Van Wagenen (“Van Wagenen”), in his official capacity as County Executive Officer, County of Riverside, and Does 1 through 10, inclusive. The following allegations are based on information and belief, unless otherwise specified.

PRELIMINARY STATEMENT

Two weeks after the filing of this action on August 20, 2024, Respondent Erin Gettis suddenly resigned from her position as Director of Respondent Riverside County Department of Animal Services and was rewarded with, as she described it publicly, a “promotional opportunity.” Gettis and Respondent County of Riverside were initially coy about where she was going, despite taxpayers in the County of Riverside certainly having the right to expect transparency and County management to adhere to their fiduciary duties to taxpayers.

Regardless, the County of Riverside ultimately acknowledged Gettis was being moved to an Executive Director position with the Riverside University Health System Medical Center. As set forth in the original Petition and Complaint, Gettis had no experience in animal services before being hired as Director of Riverside County Department of Animal Services, and likewise, her resume is devoid of any experience in health services, hospital-based clinics, medical research studies, patient care, and clinical support services, though those are some of the responsibilities specified in the job listing. Oddly, a degree in architecture meets the education requirements for this health care/patient management position, and low and behold, that is precisely the degree that Gettis has (she does not have a degree in business, nursing, healthcare, or public administration which are the other degrees that, understandably, meet the education requisites for the position). *This cavalier, and frankly corrupt, action by Respondents*

1 *to force Riverside County taxpayers to subsidize the salary for Gettis, who is yet again gifted a*
2 *position she is unqualified for, is plainly violative of the fiduciary duties Respondents owe to*
3 *their constituents. See e.g., Nussbaum v. Weeks (1989) 214 Cal.App.3d 1589, 1597 (“a public*
4 *office is a public trust ... [an officer of a county] should therefore act with the utmost good*
5 *faith”). As set forth below, the actions of Respondents are far afield of the requisite fiduciary*
6 *duties and good faith owed to the community and taxpayers in the County of Riverside.*

7 As if this imprudent and wasteful spending for a “promotion” that Gettis neither
8 deserves nor is qualified for was not enough, on September 17, 2024, Respondent Jeff Van
9 Wagenen (“Van Wagenen”), the County Executive Officer, recommended that the Board of
10 Supervisors of the County of Riverside approve a motion for a \$2,450,075 “consulting contract”
11 (with a \$245,007 aggregate contingency packed in, to boot), for a total of \$2,695,082, for the
12 fringe animal shelter consultant, Kristen Hassen. (See link here
13 (<https://cloud.wclgportal.com/s/jkRgyWiKGcDNwHA>.) The duration of the contract was 26
14 months, providing compensation to Hassen and her Texas LLC Outcome for Pets Consulting, at
15 the rate of \$94,233.65 a month (not counting the “aggregate contingency”). This is a stunning
16 waste of public funds, particularly given the previous hiring of Gettis by Respondent Van
17 Wagenen, despite the fact that she had utterly no skills or experience in animal care or shelter
18 management, though her husband, Aaron Gettis, was County Counsel for the County of
19 Riverside, when she was hired.¹ If a qualified person had been hired by Van Wagenen in the
20 first place, Hassen would not be in the picture now.

21 The Board of Supervisors, being the elected body to oversee the business of the County
22 of Riverside, and safeguard taxpayer funds, had a fiduciary responsibility to check for
23 themselves that the information provided by Van Wagenen was correct and accurate.

25 ¹ If Aaron Gettis participated in some manner in the making of his spouse’s contract to serve as
26 Director of RCDAS, this pleading will be amended to add a violation of Govt. Code §1090
27 which prohibits a public official from participating in making a contract in which that official
28 has a financial interest. Aaron Gettis would have had a financial interest in the Gettis contract
because he is married to Respondent Gettis and had a financial interest in his spouse’s salary
and benefits.

1 Shockingly, the Board of Supervisors—after a vapid eight-minute discussion (a minute and a
2 half of which were devoted to a childish rant on media coverage on this important issue) devoid
3 of any substantive value, other than one Supervisor rightly noting that the contract amount was
4 “very, very significant”—approved this boondoggle. (See link here
5 (https://youtu.be/u4Gm_iP1zo4.) The Supervisors were too sheepish to ask: (1) why was
6 Hassen selected? (2) why was no one else considered? (3) what is Hassen’s background and
7 how is she viewed in the animal shelter area? (4) what warrants such an astronomically large
8 contract? (5) what negotiations took place on the contract amount? (6) why is the County hiring
9 a “consultant” before it hires a Director to replace Gettis? and (7) why is the County not
10 consulting with the nearby and well-respected no-kill shelter in Palm Springs, or Nathan
11 Winograd, the definitive expert in no-kill shelters and a participant in the drafting of the Hayden
12 Act, rather than spending \$2.45 million on a fringe person?

13 To be fair, Van Wagenen’s executive summary (link below) was woefully inadequate,
14 and indeed, misrepresented and concealed relevant portions of Hassen’s checkered career, *never*
15 *mentioning her well known atavistic philosophy that animals should be kept out of shelters as*
16 *much as possible and left to fend for themselves on the streets, and the devastation she has*
17 *caused in communities from her approach which is more concerned with calculating numbers at*
18 *her desk than caring for animals in a shelter.*

19 (<https://cloud.wclgportal.com/s/yBR9esFBxipQdp7>;

20 <https://cloud.wclgportal.com/s/KiP5Y9ZttKMHFBq>.)

21 Though Van Wagenen indicated this was a “sole source” contract², none of the supporting
22 materials in the above links provide any insight into why Hassen was the only person in the
23 world who could fulfill the contract’s requirements. And, needless to add, she most certainly
24 was not.

25
26
27 ² A sole source contract is awarded without the usual competitive bidding process when only
28 one business can fulfill the contract’s requirements. Of course, that is demonstrably false with
respect to this contract, and further evidence of blatant collusion and corruption.

1 As Nathan Winograd, who helped draft the Hayden Act and is the Executive Director of
2 the No Kill Advocacy Center, stated:

3 *“This begs the question for Riverside County officials: Instead of hiring a “shelter”*
4 *director who doesn’t know what they are doing [Gettis] and then spending millions*
5 *more on a consultant, why not hire a director who is passionate about saving lives, has*
6 *the skill set to do so, and is willing to spend the money the taxpayers allotted for its*
7 *intended purpose: to care for animals?”* Nathan Winograd, @NathanWinograd.com,
8 September 20, 2024.

9 Indeed, at the next Board meeting on October 8, 2024, Supervisor Karen Spiegel, who
10 was not present at the previous meeting raised concerns about the “sole source” contract without
11 consideration of any other options and noted the “serious concerns brought up” at the previous
12 meeting about the contract. (<https://youtu.be/ejhujHD1i9s>.) When Supervisor Spiegel asked for
13 an explanation as to the process for cancellation of the contract, Van Wagenen initially went
14 mute and Supervisor Perez chimed in that the inquiry by Supervisor Spiegel was a “non-agenda
15 item.” Plainly, Van Wagenen and Perez had no desire for transparency and preferred to squelch
16 discussion. Ultimately, a County representative explained that the Hassen contract could be
17 cancelled at any time with 30-days notice. And, that is precisely what needs to happen.

18 As set forth below, in addition to the serious and ongoing violations of the Hayden Act,
19 and related laws and ordinances for the safety of animals under the care of a facility set forth in
20 the original pleading, the facts of this case, and ongoing malfeasance (to say the least), required
21 an amended pleading which added causes of action, under both statutory and common law, for
22 the illegal expenditure and waste of taxpayer funds, as well as fraud, collusion, *ultra vires*, and
23 failure to perform a duty.

24 The taxpayer suit claims arise out of 1) Van Wagenen’s hiring of Gettis, with no
25 qualifications or experience to serve as Director of RCDAS, 2) Van Wagenen’s “promotion” of
26 Gettis to a position which she has no qualifications or experience for, and 3) Van Wagenen’s
27 recommendation for the useless, unnecessary, excessive and financially imprudent Hassen deal
28

for \$2,450,007, that he asked the Board of Supervisors to approve, and 4) rampant nepotism in RCDAS which negatively affects the workplace in countless ways. The recognition that government officials and employees have ethical duties to the public is the foundation of the public trust. That public trust has been violated, and the duty of utmost good faith ignored, by Van Wagenen time and time again. In each instance, it resulted in the illegal and wasteful expenditure of public funds, in plain violation of the public trust. It began with the appointment of Erin Gettis as Director of Riverside County Department of Animal Services (“RCDAS” in February 2022. Gettis had no experience or qualifications to head RCDAS, let alone manage its budget of \$39,000,000. Van Wagenen knew that, yet allowed cronyism and favoritism to win out over merit since Gettis’ husband was employed by the County of Riverside as Chief Deputy County Counsel. The audacity and arrogance of this improper and outrageous hiring is mind-boggling. Needless to say, taxpayer money was thrown away—for over two and one-half years—as a result of Van Wagenen’s skirting his fiduciary duties, appointing Gettis with no qualifications for the position, and thus, wasting public funds.

Petitioners intend to seek a preliminary injunction to stay the performance of the Hassen contract, and thereby save taxpayer money, unless the County of Riverside will act in good faith, and consistent with its fiduciary duties to its residents and taxpayers, and cancel the Hassen contract, or, at the very least, stipulate to stay the performance of the \$2,450,007 contract, pending judicial review. *It is so easy to imagine the good that would come for allocating that \$2.45 million not to Hassen, but to improving the lives of the animals at the facilities. For instance, simply expanding the space available to kennels would save so many dogs and cats from being killed by RCDAS.*

Government service is a public trust; it is not an opportunity for those in power to reward others, including family or friends, with employment opportunities which they are woefully unqualified for and financial windfalls which waste taxpayer money.

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INTRODUCTION



1. The disturbing photographs above, and those throughout this pleading, were taken by a community member visiting RCDAS facilities. Some photographs were taken after the original pleading was filed. What she saw was appalling—the dog in the picture on the left had been dead for some period of time and the dog pictured on right was laying on an excrement-covered floor with more excrement on the dog’s body. How long the dogs were left in these inhumane conditions is unknown. These disturbing photographs of animal cruelty are emblematic of the fundamental failings and pervasive deficiencies, the inertia and inaction, of RCDAS and its former Director, Gettis. RCDAS under the direction of Gettis was plagued with lack of leadership, mismanagement, budget opacity, disdain for the health and safety of animals in its custody, disinterest in working with the community and rescue organizations to place animals in homes, inertia in moving to adopt no kill policies, and a focus on killing, rather than saving, dogs and cats. This must stop.

2. Animals should be treated “kindly,” as required by law, and not, as RCDAS treats them, in dirty kennels, under inhumane conditions, subject to being killed in a helter-skelter manner and placed in barrels to be disposed. ***Dogs and cats in the custody of RCDAS deserve to go out the front door to a new beginning, not the back door with their lives cut short to end up in a landfill or rendering facility.***

1 3. The original pleading in this action sought the removal of Gettis and an
2 injunctive relief compelling RCDAS to follow—not evade—the applicable law. And, the No
3 Kill Equation—a set of simple and straightforward elements, developed by Nathan Winograd of
4 the No Kill Advocacy Center, that when implemented comprehensively in animal shelters can
5 eliminate the killing of healthy or treatable animals—must be adopted by RCDAS, just as it has
6 been in communities, large and small, urban and rural, wealthy and less wealthy, throughout the
7 country.

8 4. *It is troubling that in 2024, and despite a budget of \$39,000,0000, Riverside*
9 *County Department of Animal Services is notorious for its extraordinarily high kill rate. In*
10 *2023, Best Friends Animal Society, a nationally respected organization with particular*
11 *expertise in shelter statistics, stated that RCDAS facilities killed more animals than any other*
12 *reporting shelter in the United States in 2022.³ Indeed, 24,000 animals have been killed in*
13 *the last two years—roughly 1,000 each month.⁴ The priorities of RCDAS must change.*

14 5. One purpose of this action was to permanently remove Gettis as Director of
15 RCDAS—and that was achieved within 15 days of filing the action—as well as to compel
16 RCDAS to follow and obey the law, to treat animals in their custody with necessary and prompt
17 veterinary care, nutrition, shelter, “to treat them kindly” as the law requires, and to stop killing
18 healthy and adoptable animals, and animals that could be made adoptable with reasonable
19 efforts. Sadly, so many other animals at RCDAS suffer the same fate as those in the
20 photographs in this pleading—an utter and profound lack of care, concern and dignity that they
21 are entitled to. It is time for that to change. As set forth below, the excessive killing of animals
22 without rhyme or reason and a death sentence that can come at any time, often based on a
23 _____

24 ³ RCDAS has engaged in “sleight of hand” statistical manipulation to publicly contend
25 otherwise. The tactics are as transparent as the statistical results are unconvincing. The level of
26 deceit is disturbing, but par for the course for RCDAS and Gettis.

27 ⁴ To refer to the killings as “euthanasia” is, to say the least, misleading. Euthanasia refers to
28 ending the life of someone who is terminally ill or in great pain and suffering. The
overwhelming number of dogs and cats killed at RCDAS are healthy and adoptable, or could be
made adoptable with reasonable efforts. Though the term may be a convenient one for RCDAS
to use, ending the lives of thousands of healthy and adoptable animals is anything but
euthanasia.

pretext that the animal has a behavioral or medical issue, not matter how minor or treatable (it may be as insignificant as a cough or shaking from stress), is unconscionable. This disregard for the law must stop, a no-kill policy must be adopted, and the replacement for Gettis (who was entrusted with the stewardship of RCDAS, despite absolutely no relevant experience) must be a leader truly committed to acting in the best interests of animals in the custody of RCDAS.

6. This case involves a shocking, callous, and ongoing failure to follow California law by RCDAS and Gettis, who has referred to the Hayden Act—the well-established and controlling statutory scheme regulating animal shelters—as nothing more than “legalese.”⁵ This indifference to the law is appalling. *Despite Gettis’ contempt for, and disregard of, the well-established Hayden Act, California law is clear: animals should be saved, not destroyed.*

7. The enactment of the Hayden Act placed California at the forefront of saving, rather than destroying, the lives of animals in animal care facilities. Indeed, the Hayden Act was recently affirmed less than one year ago in *Santa Paula Animal Rescue Center, Inc. v. County of Los Angeles* (2023) 95 Cal.App.5th 630, 637 where the Court of Appeal stated: “[Food and Agriculture] section 17005, subdivision (a), Civil Code section 1834.4, subdivision (a), and Penal Code section 599d, subdivision (a), *all state that it is California’s policy that no adoptable animal should be euthanized.*” The law is clear and Respondents’ willful failure to adhere to it—and indeed disregard of it—compels Court intervention.

8. Petitioners asked in the original pleading that Gettis be permanently removed from her position with RCDAS, and RCDAS be ordered to follow state laws as set forth herein, to cease practices which directly lead to the death of animals under the supposed care of RCDAS, and to stop abusive practices which are harmful to animals without any reciprocal benefit to the animals or to the public. With Gettis removed, this action continues with Hayden

⁵ Interview with Investigative Reporter Mary Strong, KMIR, May 16, 2024. In this same television interview, Gettis suddenly and disdainfully rolled her chair off camera to avoid answering questions about her management of RCDAS and the applicable law. Press Control and click link to open: <https://youtu.be/bJ1c7TLgLn0>.

1 Act claims, in addition to a taxpayer suit for the waste of public of funds, and the misconduct
2 associated with such waste.

3 **THE PARTIES**

4 9. The Petitioners in this action have spent, collectively, over a half-century
5 devoting countless hours to animal advocacy and welfare, animal rescue, shelter management,
6 animal safety, community education and no kill policies (as opposed to Gettis who evidently
7 spent no time in any of these areas before her employment with RCDAS).

8 10. Petitioner David Kirk is an individual and 14-year full-time and 19-year part-
9 time resident and taxpayer of Palm Desert, County of Riverside, State of California, and has
10 paid, or is liable to pay, to the County of Riverside a tax assessed on Petitioner by the County of
11 Riverside. Before retiring to the Coachella Valley, Petitioner Kirk was a senior executive in
12 Fortune-10 technology companies in Silicon Valley and Washington, D.C. Petitioner Kirk is
13 beneficially interested in this action as a citizen of the State of California in having the laws
14 discussed herein executed properly and the duties owed by Gettis and RCDAS enforced.
15 Petitioner Kirk first became involved with RCDAS in 2008 when his wife (Dr. Leigh Kirk,
16 DVM, MS), prior to graduating as a veterinarian from Colorado State University with a specific
17 interest in Feline and Shelter Medicine, volunteered with RCDAS. Petitioner Kirk quickly
18 learned that RCDAS had a very high kill rate for cats and Petitioner began to review and
19 analyze their published data. Based on Petitioner's calculations of RCDAS published statistics
20 for 2009, 4 out of every 5 cats who entered RCDAS did not leave alive. In 2015, upon learning
21 that RCDAS was killing hundreds of underage kittens (less than 8 weeks of age, because they
22 needed 24-hour care which RCDAS would not provide), Petitioner Kirk converted one of his
23 outbuildings to a kitten nursery and started saving cats that would otherwise be killed by
24 RCDAS. Between 2010 and 2022, Petitioner Kirk and his spouse rescued approximately 1500
25 cats and kittens. Petitioner worked diligently to bring resources to RCDAS to achieve higher
26 life-saving rates.

11. Petitioner Kirk has extensively reviewed and analyzed the statistics provided by RCDAS, and has found that the public information contains, and continues to contain, gross irregularities (e.g., earlier this year, the public records stated that approximately 15,700 animals, going back to 2016, were “still in the shelter”), clearly an absurdly ridiculous assertion. In a subsequent meeting with RCDAS staff, it was disclosed that the public data did not accurately represent the actual internal data, and that a faulty process implemented in 2016 had cumulatively introduced the erroneous data each month and the quality assurance procedures were either not performed or failed to detect the errors for the following eight years. Further, using internal shelter data records, it would appear to be mathematically highly improbable to produce a calculation showing a live release rate of 97% for cats, and 95% for dogs, in RCDAS facilities, without either (a) double counting dogs and cats who transfer between shelter and foster homes (a matter that was suggested to the then staff in 2016), and (b) counting cats involved with Trap Neuter Return (TNR) and Community Cat Programs – both of which distort LLR erroneously to provide “better” results. In sum, the kill rates at RCDAS facilities appear exponentially higher than those represented by RCDAS and Gettis, and RCDAS is inaccurately reporting data, including LRR data.

12. Petitioner Lisa Blodgett is an individual and 40-year resident and taxpayer of the City of La Quinta, in the County of Riverside, State of California, and has paid, or is liable to pay, to the County of Riverside a tax assessed on Petitioner by the County of Riverside. Petitioner is beneficially interested in this action as a citizen of the State of California in having the laws discussed herein executed properly and the duties owed by Gettis and RCDAS enforced. Petitioner Blodgett has been involved in animal safety, animal rescue and community education for over 16 years, beginning in 2008 with speaking out on the cruelty of the Palm Springs rodeo in conjunction with the nonprofit Desert Paws. In 2009, Petitioner volunteered with the Humane Society of the Desert, assisting with fundraising events, and adopted a pit bull. Petitioner first experienced and witnessed the inhumane and illegal treatment of pets at the Indio Animal Shelter in about 2010. Animals were kenneled in substandard conditions, and

1 volunteers, including Petitioner, paid to install a misting system. During the fundraiser that was
2 held at the Indio Shelter, many people saw the deplorable conditions. Petitioner, along with
3 others, began to volunteer.

4 13. Petitioner Blodgett worked diligently with the Mayor of Indio to teach the staff
5 how to clean kennels, transform the shelter from high-kill to no-kill, implement the programs,
6 and hire a qualified director. Petitioner communicated with Best Friends Animal Society to
7 help with a search for a director. The Grand Jury investigated the conditions at the Indio
8 shelter. A lawsuit was also filed against the city of Indio for the deplorable
9 conditions. Afterwards, the town of Indio chose to shut down the shelter in 2012 and contract
10 with the county of Riverside Animal Services. Over 200 pets were at the Indio shelter. Through
11 the relationships with rescues in Canada and Washington, the volunteers coordinated several
12 flights to safety and homes. A few local rescues also had adoption events. Every dog and cat
13 from Indio made it out alive and did not get transferred to RCDAS. Petitioner Blodgett has
14 fundraised at events and fostered for the Pet Rescue Center in Coachella. Petitioner has
15 volunteered with Wings of Rescue and coordinated flights with dogs from Coachella Valley
16 Animal Campus and the Palm Springs Animal Shelter to rescues in Bellingham, Washington,
17 and Canada. Petitioner has also whelped and raised almost 20 canine families from the
18 Coachella Valley, preventing them from entering the shelter system.

19 14. Petitioner Blodgett pulled three puppies under four months old from RCDAS in
20 2014 directly from what they called the “jeopardy” cage back behind closed doors. Petitioner
21 was allowed back there with the Animal Samaritans rescue coordinator. Petitioner has two
22 today. They were going to be killed for being fearful. They have been beautiful pets and part of
23 Petitioner’s family for ten years. Once Petitioner exposed this at an RCDAS commission
24 meeting, she could no longer pull dogs from jeopardy cages. Since then, Petitioner has saved
25 many dogs from RCDAS and San Bernardino Shelter, and found them homes. Over the past
26 years, Petitioner has had extensive experience and interaction with RCDAS including past
27 directors and the staff.

1 15. Petitioner Blodgett believes strongly that a no-kill facility *is achievable, but*
2 *requires a compassionate, hard-working Director with experience in the field leading the way*
3 *and not rubber-stamping the continued killing of animals.*

4 16. Petitioner Tiffani LoBue has been at the forefront of animal advocacy for 27
5 years, and is a resident and taxpayer of the City of Palm Springs, County of Riverside, State of
6 California, and has paid, or is liable to pay, to the County of Riverside a tax assessed on
7 Petitioner by the County of Riverside. Petitioner is beneficially interested in this action as a
8 citizen of the State of California in having the laws discussed herein executed properly and the
9 duties owed by Gettis and Riverside County Department of RCDAS enforced. Petitioner
10 LoBue's journey to animal rights and advocacy began before moving to Palm Springs, but upon
11 arrival, Petitioner quickly immersed herself in volunteering with Save-a-Pet, in Desert Hot
12 Springs, an organization that rescued stray and discarded animals from the fields and streets in
13 the area. Petitioner also volunteered with Orphan Pet Oasis (now the Humane Society of the
14 Desert) and worked with both organizations until 2003.

15 17. In 2004, Petitioner LoBue volunteered with Animal Samaritans doing
16 administrative work, cleaning kennels and walking dogs. Later, Petitioner began a 7-year
17 project of transporting dogs from the Thousand Palms facility to homes in Southern California.

18 18. Thereafter, Petitioner LoBue began to regularly speak at city council Board
19 meetings through the Coachella Valley in support of a variety of causes, including spay/neuter
20 programs, backyard breeding, and related proposed ordinances.

21 19. In 2013, Petitioner LoBue began to volunteer with the Palm Springs Animal
22 Shelter which now serves as a model for no kill shelters. In addition, Petitioner has volunteered
23 for the Animal Rescue Center of California, based in Coachella, California, which works to save
24 dogs from the East Valley. Petitioner has attempted time and time again to meet with Gettis to
25 discuss her concerns, was successful in meeting with her once, but her efforts to meet again
26 have been ignored for two years.

20. Respondent Erin Gettis is, and at all times relevant hereto has been, the Director of Respondent Riverside County Department of Animal Services. Coincidentally, Respondent Gettis' husband, Aaron Gettis, is Chief Deputy County Counsel for the County of Riverside.⁶

21. Respondent Jeff Van Wagenen is, and at all times relevant hereto has been, the County Executive Officer of the County of Riverside, State of California.

22. Respondent Riverside County Department of Animal Services provides all animal services for Respondent County of Riverside, including shelter services and operates four facilities that house dog, cats and other animals. The shelters are (1) the Western Riverside County/City Animal Shelter in Jurupa Valley, California, (2) the San Jacinto Valley Animal Campus in San Jacinto, California, (3) the Coachella Valley Animal Campus in Thousand Palms, California, and (4) the Blythe Animal Shelter in Blythe, California.

23. Respondent County of Riverside is a political and geographic subdivision of the State of California established and operating under the laws of the State of California and created for the provision of government services.

24. The true names or capacities, whether individual, corporate, partnership, joint venture, or otherwise of Respondents DOES 1 through 10, inclusive, are unknown to Petitioners, who therefore sue these Respondents by such fictitious names. Each of the fictitiously named Respondents is responsible in some manner for the occurrences and violations herein alleged. Petitioners will amend this Petition to allege the true names and capacities of Does 1 through 10 when ascertained.

25. At all times herein mentioned, each Respondent was acting as the agent, servant, representative, partner, employee, joint venturer and/or co-conspirator of each remaining Respondent. Each Respondent was acting in concert with each of the remaining Respondents in all matters herein alleged. At all times herein mentioned, each of the Respondents was acting within the course and scope of such agency, employment, representation, partnership, joint

⁶ An obvious conflict of interest arises with respect to Mr. Gettis' position with the County of Riverside and the representation of his spouse, Respondent Gettis, in this action.

venture, conspiracy, and/or concert of action, with the advance knowledge, permission, acquiescence, authorization, direction, or subsequent ratification of each and every remaining Respondent.

JURISDICTION AND VENUE

26. This Court has jurisdiction under *Code of Civil Procedure* §1085 and *Civil Code* §525, *et seq.* The County of Riverside is the proper venue for this Petition since the acts performed by the Respondents, including but not limited to, the violations of statutes, took place and continue to take place in the County of Riverside. Further, the impact of Respondents' decisions, policies, acts, and failures to act have had and will continue to have severe adverse impact upon Petitioners, the County of Riverside, its citizens and its dogs, cats, and other animals, as more fully set forth herein.

FACTUAL BACKGROUND

27. Petitioners have satisfied the requirements for a Writ of Mandate in that (1) Petitioners have a beneficial interest in the outcome of this Petition in that each of them have been involved in animal advocacy for decades and have a strong interest in requiring Respondents to follow the law, including the Hayden Act; (2) there is no plain, speedy, or adequate remedy at law; (3) dogs and cats will continue to be killed daily by RCDAS and (4) the lack of adherence to the law by RCDAS will continue unless the Court orders Respondents to follow and obey the applicable law and issue injunctive relief as requested herein.

28. An actual controversy exists in that Petitioners contend Respondents have failed and continue to fail to follow the laws as set forth herein. Petitioners further contend that Respondents have established a pattern and practice of violations of the law, and that the conduct and lack of action alleged herein is neither isolated nor random. Indeed, Respondents have ignored the request of employees, volunteers, rescue organizations and the general public, and insist they have acted in accordance with the laws, and that the policies and procedures of RCDAS and Gettis are consistent with the law. This is so despite Gettis' stated blatant disregard for the provisions of the Hayden Act.

1 29. Thus, Petitioners seek injunctive relief and respectfully request that the Court
2 intervene and resolve this conflict, order RCDAS to comply with the law, enjoin RCDAS to
3 adhere to policies and procedures that are consistent with, and required by, the applicable law,
4 in order to ensure that animals in the custody of RCDAS are treated humanely and kindly,
5 provided necessary and prompt medical condition, accurate records are properly maintained,
6 and animals that are adoptable or could be made adoptable with reasonable efforts are not
7 killed. Further, Petitioners respectfully request the Court appoint an independent third party to
8 oversee compliance and report findings back to the Court. Given the gravity of this situation,
9 and the lack of transparency by Respondents, the appointment of a third party to report back to
10 the Court is critical to ensure compliance with the law as well as to protect the health, safety and
11 dignity of animals in the custody of RCDAS.

12 30. Gettis publicly stated that the Hayden Act is not an enacted law—cavalierly
13 describing it as “legalese” that she does not have “to dwell on.” This displays an utter lack of
14 understanding of the law. In fact, provisions of the Hayden Act were upheld as recently as
15 September 2023. *See e.g., Santa Paula Animal Rescue Center, Inc. v. County of Los Angeles*
16 (2023) 95 Cal.App.5th 630 (provisions of the Hayden Act “all state that it is California’s policy
17 that no adoptable animal should be euthanized”). Press Control and click link to open:
18 <https://youtu.be/Q1m5yCQvahk>.

19 31. In 1998, noting the “social and economic costs of euthanasia,” the California
20 Legislature enacted—on an almost unanimous vote—the Hayden Act with the purpose of
21 shifting California’s animal shelter system from *taking lives* to *saving lives* of animals that
22 found their way to an animal shelter. The Hayden Act’s provisions are codified throughout the
23 *Civil Code*, the *Food and Agricultural Code*, and the *Penal Code*. *In all three codes, the*
24 *Legislature specifically emphasized the policy of California to save, not kill, animals. See Civil*
25 *Code §1834.4 (“It is the policy of this state that no adoptable animal should be euthanized if it*
26 *can be adopted into a suitable home.”); Food & Agriculture Code §17005 (same); Penal Code*
27 *§599d (same).* Under the statutes, even animals that are not technically “adoptable” should not
28

1 be euthanized “if they could become adoptable with reasonable efforts.” *This policy preference,*
2 *enacted by the People of the State of California, is the law and does not warrant the derision*
3 *by Gettis as “legalese.”*

4 32. The annual budget of RCDAS for fiscal year 2023/2024 is \$39,138,743.00. This
5 is an almost \$17,000,000.00 increase over fiscal year 2022/2023. Instead of allocating that
6 money to the care and welfare of the animals to which it is entrusted and facilitating their
7 adoption to the public and rescue organizations, RCDAS and Gettis use the money to inflate
8 upper management salaries and spend it in ways that are opaque, at best, and do nothing to
9 proactively move RCDAS to a no kill facility.⁷

10 33. RCDAS cuts costs by carrying out a policy to kill healthy, adoptable animals,
11 instead of spending resources feeding, caring for and housing them, and hiring sufficient
12 personal to perform those duties and veterinary services, and ensuring that the animals are
13 adopted in the community or through animal rescue organizations.

14 34. RCDAS refuses to spend money necessary to carry out their basic duties towards
15 dogs and cats, and the taxpaying citizens of the County of Riverside, including (1) the
16 recruitment and hiring of critically needed kennel attendants and employees who actually render
17 care and services to the animals, (2) ensuring that proper and necessary veterinary medical care
18 is available to all animals; (3) educating and training kennel staff to properly handle, interact,
19 treat, and assess animals, and (4) develop and implement proven and successful animal welfare
20 programs where the public or rescue organizations are encouraged to adopt animals.

21 35. These critical duties are out of reach in large part due to Gettis being hired by
22 Van Wagenen as the Director of RCDAS. Gettis had no prior education, work experience or
23 background in animal welfare, animal behavioral science or shelter management. Gettis has a
24 Bachelor’s degree in Architectural Studies and a Master’s degree in Architecture. Her work
25 experience before arriving at RCDAS consisted of the following:

26 _____
27 ⁷ To illustrate, RCDAS accounting records show hundreds of dollars paid to Gettis for such
28 items as “public service transportation” and “meals.” Another entry shows a check issued for
\$29,719.00 for “professional services,” with no vendor identified.

* November 2003 – March 2005: Historic Preservation Manager, City of San Juan Capistrano:

* March 2005 – January 2006 – County Historic Preservation Officer, Riverside County Regional Parks and Open-Space District;

* January 2006 – February 2018 – City of Riverside, Division Manager- Neighborhood Engagement Division (March 2013 – February 2018), Principal Planner (March 2011 – February 2013), City Historic Preservation Officer (January 2006 – March 2011)

* March 2018 – March 2022 – Riverside County Regional Parks and Open-Space District, Bureau Chief – Planning and Development (March 2018 – December 2019); Assistant Director (December 2019 – March 2022).

36. In sum, Gettis’ works history is essentially Parks and Rec. That is the extent of it. Before becoming Director of RCDAS in March 2022, she had absolutely no experience with animal care, animal welfare or shelter management, *let alone being entrusted to run an organization with a 39-million-dollar budget.* Respondent Gettis’ lack of qualifications, training and experience plays an inordinate role in giving RCDAS the dubious distinction of being an animal shelter with the highest kill rate among reporting shelters *in the entire United States.*

37. Notably, Gettis’ hiring as Director of RCDAS was, to say the least, opaque and secretive. *She was not hired by the County of Riverside Board of Supervisors nor were any public hearings held relating to her employment by the County of Riverside. Gettis was appointed to the position of RCDAS Director by Van Wagenen. This appointment was effective on March 10, 2022. As the CEO made this appointment, there was no associated agenda item at a Board of Supervisors meeting. Yet, Gettis was hired, despite her lack of any requisite skills to guide RCDAS and oversee its budget.*

38. The lack of transparency in the hiring of Gettis as Director of RCDAS— particularly for a position as the head of a county department with a 39-million-dollar budget,

and given her remarkable absence of any qualifications for the position—is, simply stated, inexplicable. Indeed, the only discernible connection between Gettis and Riverside County at the time of her hiring was that her husband, Aaron Gettis, was Chief Deputy County Counsel for Riverside County. *It is unclear what role her husband may have played in her employment for a position that provides her with a compensation package of approximately \$278,216 per year or how this obvious conflict of interest was handled (if it was) by the County of Riverside. Mr. Gettis, Respondents Gettis, Van Wagenen, Riverside County and RCDAS have been noticeably mum on this issue.*

FIRST CAUSE OF ACTION

**Writ of Mandate for Violations of *Civil Code* §1834.4(a),
Penal Code §599d, and *Food & Agriculture Code* §17005(a)
(Against Respondents Gettis, RCDAS, County of Riverside)**

39. Petitioners reallege and incorporate all allegations herein as if fully set forth in this cause of action.

40. *Civil Code* §1834.4(a), *Food & Agricultural Code* §17005(a), and *Penal Code* §599d state: “It is the policy of the state that no adoptable animal should be euthanized if it can be adopted into a suitable home. Adoptable animals include only those animals eight weeks of age or older that, at or subsequent to the time the animal is impounded or otherwise taken into possession, have manifested no sign of a behavioral or temperamental defect that could pose a health or safety factor risk or otherwise make the animal unsuitable for placement as a pet, and have manifested no sign of disease, injury, or congenital or hereditary condition that adversely affects the health of the animal or that is likely to adversely affect the animal’s health in the future.”

41. Public policy statutes are not meaningless statutes. An important purpose of a statute reflecting the public policy of California is to resolve any ambiguity between statutes. With respect to the Hayden act, the public policy is to preserve and further the adoptability of animals. *This public policy statute is directly applicable to the Third Cause of Action herein to*

1 *compel Respondents to provide necessary and prompt medical care to shelter animals so they*
2 *may be adopted rather than killed.*

3 42. The California Court of Appeal has specifically upheld, in the context of the
4 Hayden Act, that a Court “must examine the entire statutory scheme to determine” if the
5 ministerial act for mandamus purposes is an act that a public officer is required to perform.
6 *Santa Paula Animal Rescue Center, Inc. v. County of Los Angeles* (2023) 95 Cal.App.5th 630,
7 639. “The statutory scheme must be read as a whole. Section 17005, subdivision (a), Civil
8 Code section 1834.4, subdivision (a), and Penal Code section 599d, subdivision (a), all state that
9 it is California’s policy that no adoptable animal should be euthanized.” *Id.* at 637.

10 43. In *Santa Paula Animal Rescue*, the Court of Appeal reversed a demurrer by the
11 County of Los Angeles to the petition for writ of mandate. The issue in *Santa Paula Animal*
12 *Rescue* was the interpretation of a statutory provision of the Hayden Act; specifically, Food and
13 Agricultural Code §31108, and whether it required a shelter to release an animal to a qualified
14 rescue organization regardless of whether the animal had behavioral problems, or is adoptable
15 or treatable.

16 44. In reversing the trial court, the Court of Appeal read the statutory scheme of the
17 Hayden Act as a whole, and concluded that the policy statutes did not give the County
18 discretion to withhold dogs from rescue or adoption because of behavioral problems or a
19 determination that a dog was unadoptable or untreatable. The ministerial duty to release dogs to
20 further their adoptability, rather than killing them, was a mandatory duty imposed on the
21 County.

22 45. The public policy statutes in this cause of action were followed to resolve
23 ambiguity in the provisions of section 31108. The application of the public policy statutes in
24 this cause of action to the Third and Sixth Causes of Action herein are as compelling as they
25 were in *Santa Paula Animal Rescue*.

26 46. *This is because Respondents have a pattern and practice of killing adoptable*
27 *animals and not providing necessary and prompt medical care. Indeed, in the past few months,*
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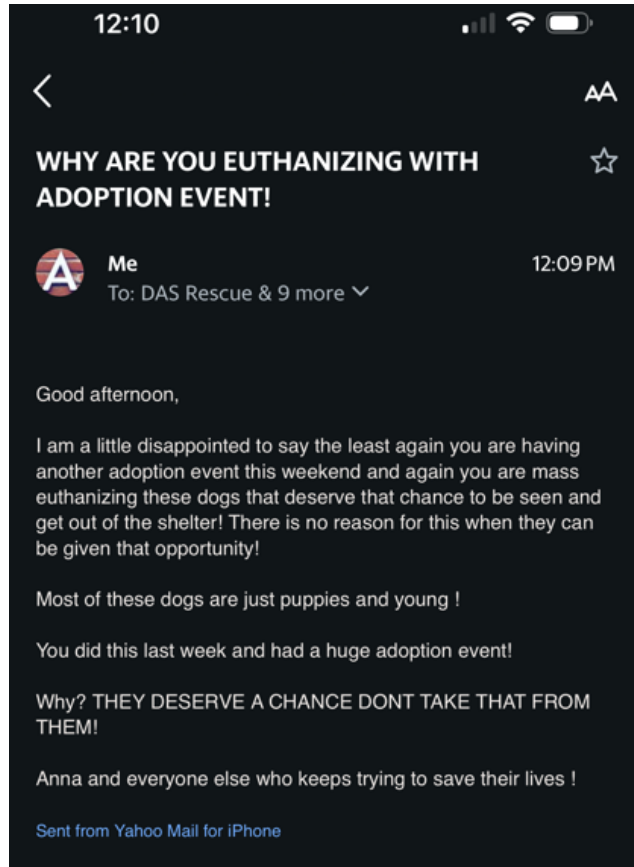
there has been a discernible uptick in dogs being labeled as “behavioral” and killed shortly thereafter. As another example, on April 11, 2025, two dogs were adopted. The adopter realized both were sick and showing symptoms of the parvo virus, so he returned the dogs, a German Shepherd and a Husky, to the Coachella Valley Animal Campus for emergency medical treatment. Rather than provide emergency medical care for a treatable condition, the German Shepherd was killed immediately, the Husky was placed back with the former kennel mates (all parvo exposed), and those three dogs died without receiving any medical care. (See below.)

*UPDATE*Not one of these Parvo Positive Pups made it out alive

The two Pups pictured up front were adopted two days ago. The adopter realized both were sick and showing signs of parvo so he returned them to CVAC hoping for medical treatment.



47. This is not an isolated instance—it is the pattern and practice of how the animal shelters are mismanaged by Respondents. Thus, applying the entire statutory scheme of the Hayden Act—as mandated by *Santa Paula Animal Rescue*—including the public policy provisions set forth in this cause of action, are necessary to understand and apply the ministerial duties to provide necessary and prompt medical care in the Third Cause of Action, and keep accurate records for shelter animals, set forth in the Sixth Cause of Action.



48. Dogs remain in kennels for days without any interaction or exercise, and the only break comes if a volunteer is able to spend some time with the animal.

49. The prolonged confinement causes stress on the animals and adversely affects the animal's mental and physical condition. Over time, without a means to release the pent-up energy, a dog will begin to exhibit signs of kennel stress, such as barking excessively, jumping up and down when a person walks by, or over excitement such as jumping on a person if the person attempts to connect with the dog. Moreover, given the abysmal kennel conditions (the photographs below are indicative of those conditions) animals often suffer from kennel cough or giardia which is used as a pretext to then kill the animals, despite the fact that these infectious conditions are easily treatable with minimal expense.

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50. These behavioral issues not only decrease the likelihood of adoption, but in fact, increase the dog's likelihood of being killed by RCDAS. Indeed, RCDAS, with the support of Gettis, and now Mary Martin and Kristen Hassen, uses the pretext of animal behavioral problems to support the killing of the animal. Even young puppies and kittens are not spared from this haphazard, wanton and unrelenting killing.

51. To ensure temperament and behavioral evaluations before sentencing a healthy animal to death, RCDAS must hire qualified professionals such as properly qualified animal behaviorists and veterinarians. These professionals may then perform evidence-based, proper and lawful behavioral evaluations to determine whether the dog has a behavioral or temperamental defect that could pose a health or safety risk or otherwise make the animal unsuitable for adoption, before reaching the irreversible decision to kill an animal. The

1 individuals currently entrusted with deciding whether an animal will lose his or her life at
2 RCDAS lack those qualifications.

3 52. RCDAS kills adoptable dogs without any warning and without providing
4 adequate warnings of impending euthanization on its website since the “red list” of animals
5 about to be killed is not on the adoption section of the website. Virtually every day dogs are
6 denied the chance of adoption because of this defective and limited system of alerts, and despite
7 the fact that community members and qualified rescue organizations are ready and able to adopt
8 the animals.

9 53. The limited hours of operation (10:00 a.m. – 4:00 p.m.) make it difficult for
10 those who are employed to visit the shelter during the week. The facilities are not open in the
11 evenings. Moreover, telephone calls are not answered on Saturdays which is yet another
12 roadblock to adoption.

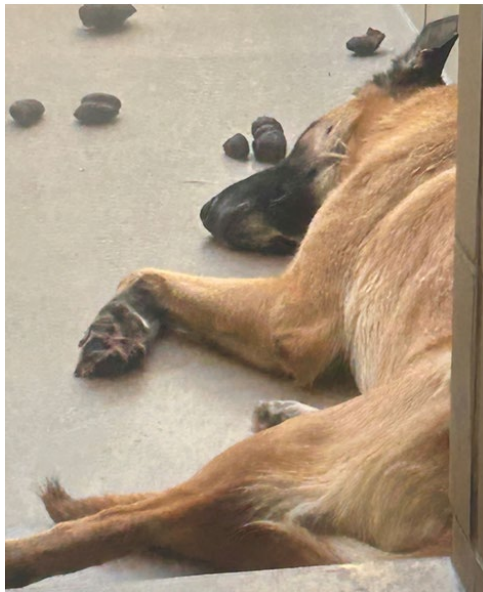
13 54. Moreover, far too many times, community members show up at the shelters with
14 an interest in adopting a particular dog or cat they have seen online or expressed an interest in
15 adopting to RCDAS staff, only to be told the animal has been killed when they come to the
16 shelter. No reason is stated, just that it was killed.

17 55. Equally egregious, there have been instances where a person arrived at the
18 facility to adopt a pet and was prevented from doing so by RCDAS staff. On one occasion, a
19 person went to adopt the dog “Penelope” on May 30, 2024. She was prevented from doing so.
20 One day later, on May 31, 2024, RCDAS records state Penelope underwent “euthanasia.”
21 Penelope was pregnant when she was killed and was only one year old herself. These heartless
22 policies are utterly inconsistent with the legal obligation to save adoptable animals, not destroy
23 them.

24 56. Rather than continue to kill adoptable animals, RCDAS must focus their
25 resources on programs that promote and encourage adoption. Such programs would include
26 training and educating kennel attendants and volunteers, recruiting volunteers, having sufficient
27

veterinary care available for animals, and increasing meaningful community and rescue outreach.

57. In sum, the statutory scheme of the Hayden Act must be read as whole. Accordingly, the public policy provisions of *Civil Code* §1834.4(a), *Food & Agricultural Code* §17005(a), and *Penal Code* §599d have meaning and are consequential. Simply stated, the policy to save, not kill, animals must be read in conjunction with the ministerial duty to provide necessary and prompt medical care to animals. The statutory provisions in this cause of action are part and parcel of the statutory provisions in the Third and Sixth Causes of Action.



SECOND CAUSE OF ACTION

Writ of Mandate for Violations of *Civil Code* §1834.4(b) and *Food & Agriculture Code* §17005(b)

(Against Respondents Gettis, RCDAS, County of Riverside)

58. Petitioners reallege and incorporate all allegations herein as if fully set forth in this cause of action.

59. *Civil Code* §1834.4(b) and *Food & Agricultural Code* §17005(b) state: "It is the policy of the state that no treatable animal should be euthanized. A treatable animal shall

1 include any animal that is not adoptable but that could become adoptable with reasonable
2 efforts.”

3 60. Public policy statutes are not meaningless statutes. An important purpose of a
4 statute reflecting the public policy of California is to resolve any ambiguity between statutes.
5 With respect to the Hayden act, the public policy is to preserve and further the adoptability of
6 animals. *This public policy statute is directly applicable to the Third Cause of Action herein to*
7 *compel Respondents to provide necessary and prompt medical care to shelter animals so they*
8 *may be adopted rather than killed, as well as to the Sixth Cause of Action herein to ensure*
9 *accurate records are kept to assist in their adoption.*

10 61. The California Court of Appeal has specifically upheld, in the context of the
11 Hayden Act, that a Court “must examine the entire statutory scheme to determine” if the
12 ministerial act for mandamus purposes is an act that a public officer is required to perform.
13 *Santa Paula Animal Rescue Center, Inc. v. County of Los Angeles* (2023) 95 Cal.App.5th 630,
14 639. “The statutory scheme must be read as a whole. Section 17005, subdivision (a), Civil
15 Code section 1834.4, subdivision (a), and Penal Code section 599d, subdivision (a), all state that
16 it is California’s policy that no adoptable animal should be euthanized.” *Id.* at 637.

17 62. In *Santa Paula Animal Rescue*, the Court of Appeal reversed a demurrer by the
18 County of Los Angeles to the petition for writ of mandate. The issue in *Santa Paula Animal*
19 *Rescue* was the interpretation of a statutory provision of the Hayden Act; specifically, Food and
20 Agricultural Code §31108, and whether it required a shelter to release an animal to a qualified
21 rescue organization regardless of whether the animal had behavioral problems, or is adoptable
22 or treatable.

23 63. In reversing the trial court, the Court of Appeal read the statutory scheme of the
24 Hayden Act as a whole, and concluded that the policy statutes did not give the County
25 discretion to withhold dogs from rescue or adoption because of behavioral problems or a
26 determination that a dog was unadoptable or untreatable. The ministerial duty to release dogs
27

1 preserving and further their adoptability, rather than killing them, was a mandatory duty
2 imposed on the County.

3 64. The public policy statutes in this cause of action were followed to resolve
4 ambiguity in the provisions of section 31108. The application of the public policy statutes in
5 this cause of action to the Third and Sixth Causes of Action herein are as compelling as they
6 were in *Santa Paula Animal Rescue*.

7 65. *This is because Respondents have a pattern and practice of killing adoptable*
8 *animals and not providing necessary and prompt medical care. As just one example (a recent*
9 *one), on April 11, 2025, two dogs were adopted. The adopter realized both were sick and*
10 *showing symptoms of the parvo virus, so he returned the dogs to the Coachella Valley Animal*
11 *Campus for emergency medical treatment. Rather than provide emergency medical care for a*
12 *treatable condition, the animals—and their previous kennel mates—all died within a matter of*
13 *days.*

14 66. This is not an isolated instance—it is the pattern and practice of how the animal
15 shelters are mismanaged by Respondents. Thus, applying the entire statutory scheme of the
16 Hayden Act, including the public policy provisions set forth in this cause of action, are
17 necessary to understand and apply the ministerial duties to provide necessary and prompt
18 medical care in the Third Cause of Action and to keep accurate records for shelter animals in the
19 Sixth Cause of Action.

20 67. As shown in the video link herein, there are many animals that arrive at RCDAS
21 with treatable conditions or develop treatable conditions after arrival. Press Control and click
22 link to open: <https://youtube.com/shorts/Zd1A2yrobU0?feature=share>.

23 68. Given the abysmal kennel conditions, animals often suffer from kennel cough or
24 giardia which may be used as a pretext to then kill the animals, despite the fact that these
25 infectious conditions are easily treatable with minimal expense.

26 69. There is no veterinarian present full-time at each of the three larger RCDAS
27 facilities for daily routine and emergency care.

70. Respondents do nothing to address these treatable conditions, and instead, use the condition as a pretext to kill the animal. This is a plain violation of Civil Code §§1834 and 1846 in the third cause of action which, as discussed above, Gettis dismissed as “legalese” that she ignored.

71. In sum, the statutory scheme of the Hayden Act must be read as whole. Accordingly, the public policy provisions of *Civil Code* §1834.4(b), *Food & Agricultural Code* §17005(b), have meaning and are consequential. Simply stated, the policy to save, not kill, treatable animals must be read in conjunction with the ministerial duty to provide necessary and prompt medical care to animals and to keep accurate records. The statutory provisions in this cause of action are part and parcel of the statutory provisions in the Third and Sixth Causes of Action.

THIRD CAUSE OF ACTION

Writ of Mandate for Violations of Civil Code §§1834 and 1846 for Failure to Provide Animals with Necessary and Prompt Veterinary Care, Nutrition, and Shelter, and to Treat them Kindly

(Against Respondents Gettis, RCDAS, County of Riverside)

72. Petitioners reallege and incorporate all allegations herein as if fully set forth in this cause of action.

73. *Civil Code* §1834 states: “A depository of living animals shall provide the animals with necessary and prompt veterinary care, nutrition, and shelter, and treat them kindly.” The photographs below depict dogs that are not treated kindly, but instead, placed in disgusting kennels that simply cause them to experience more distress in an unpleasant and filthy environment.

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74. Civil Code §1846(b) states, “A gratuitous depositary of a living animal shall provide the animal with necessary and prompt veterinary care, adequate nutrition and water, and shelter, and shall treat it humanely and, if the animal has any identification, make reasonable attempts to notify the owner of the animal’s location. Any gratuitous depositary that does not have sufficient resources or desire to provide that care shall promptly turn the animal over to an appropriate care facility.” Subsection (c) states that even “[i]f the gratuitous depositary of a living animal is a public animal shelter ... the depositary shall comply with all other requirements of the Food and Agricultural Code regarding the impounding of live animals.”

75. Despite the sizable budget of 39 million dollars for RCDAS there is no veterinarian present full-time at each of the three larger facilities for daily routine and emergency care. Currently, many animals are seen and examined by veterinary technicians only.

76. As a result, many animals do not, and have not, received necessary and prompt veterinary care, in violation of *Civil Code* §1834. Indeed, Gettis public admits that RCDAS does not comply with its statutory duties with respect to veterinary care and contends it is the responsibility of others. Press Control and click link to open: <https://youtu.be/MWgHVeZfBkI>.

77. Instead, animals with minor health issues that could easily be corrected are ignored and not treated, and those minor and treatable conditions are used as pretext to then kill the animal. Conditions such as kennel cough and giardia are prevalent at RCDAS and could be treated at little expense. Indeed, allocating just a few hundred dollars to medicines for dogs at RCDAS—rather than Gettis’ meals—would improve the health and happiness of so many animals stuck in the RCDAS kennels.



FOURTH CAUSE OF ACTION

**Writ of Mandate for Violations of Riverside County
Code of Ordinances §6.08.120 – Altered and unaltered animals
(Against Respondents Gettis, RCDAS, County of Riverside)**

78. Petitioners reallege and incorporate all allegations herein as if fully set forth in this cause of action

79. Riverside County *Code of Ordinances* §6.08.120 provides that “[a]n owner *or* *custodian* of an unaltered dog must have the dog spayed or neutered, or provide a certificate of sterility, or obtain an unaltered dog license in accordance with this chapter. An owner *or* *custodian* of an unaltered cat must have the animal spayed or neutered or provide a certificate of sterility.” (Emphasis added.) §6.08.120(A)(3) states that “[a]ny dog or cat impounded at a

county animal shelter is required to be spayed or neutered prior to release unless exempt [under the ordinance].”

80. Rather than follow §6.08.120, RCDAS has dodged it for years and neglects to spay or neuter the dogs and cats in the county shelters before they are released.

81. Instead, RCDAS impermissibly transfers this legal duty to others, including those who adopt dogs or cats, or rescue agencies, and has steadfastly refused to follow the law to spay or neuter dogs and cats in its custody in the shelters.

82. This is especially irresponsible since, though RCDAS may set appointments for those who adopt dogs or cats for spay or neutering, those appointments are frequently set months in advance which is inconsistent with the policy behind *Code of Ordinances* §6.08.120.



FIFTH CAUSE OF ACTION

Writ of Mandate for Violations of Food & Agricultural Code §32003

(Against Respondents Gettis, RCDAS, County of Riverside)

83. Petitioners reallege and incorporate all allegations herein as if fully set forth in this cause of action.

84. Food and Agricultural Code §32003 requires that all public shelters keep accurate records for every animal taken up, impounded, or treated. In addition to including information such as the date of euthanasia and final disposition of the animal, the records must include the “circumstances under which the animal was taken up, medically treated, euthanized or impounded.”

85. Respondents consistently violate this statute by failing to accurately and truthfully record information about the circumstances under which they kill animals, and report intake and outcomes. For instance, Respondents maintain inaccurate records that do not correctly state information relating to animals under their care. Further, Respondents routinely falsify records by listing the reason for euthanasia as “medical” or “behavioral” when, in truth, the decision to kill the animal was made by Respondents for reasons completely unrelated to medical condition since the animals are healthy and adoptable, and instead based on a sham reason, unsupported by actual facts. Further records state that a rescue organization was sought for a “behavioral” animal, then sometimes moments later, an entry is made that no rescue is available, and thereafter, the animal is killed.

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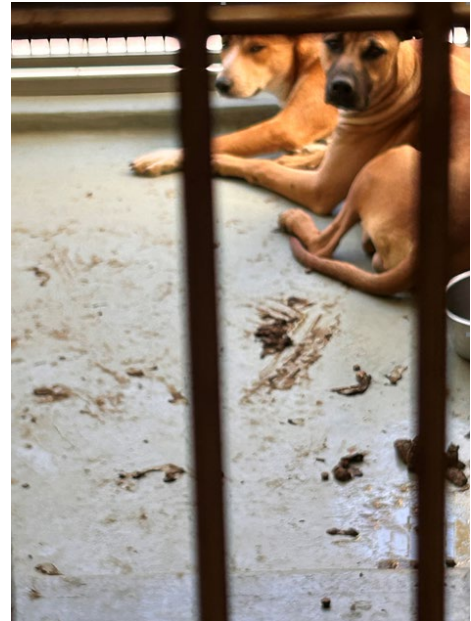
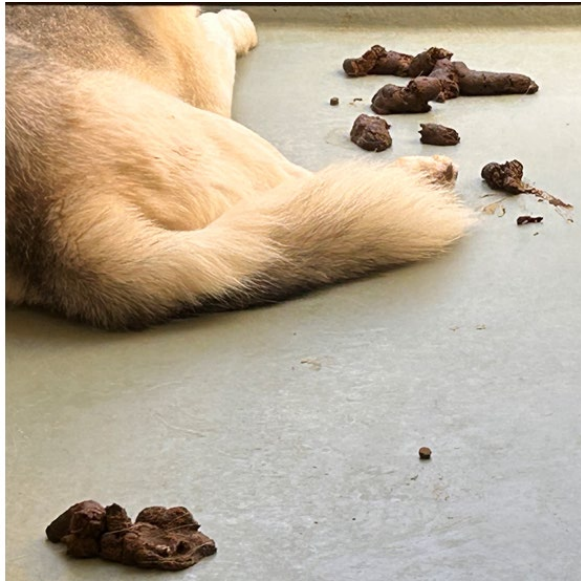
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SIXTH CAUSE OF ACTION

Taxpayer Suit pursuant to Code Civ. Proc. §526a and Common Law – Hassen Contract (Against Respondents County of Riverside, RCDAS, and Van Wagenen)

86. Petitioners reallege and incorporate all allegations herein as if fully set forth in this cause of action.

87. “It is settled that a taxpayer can bring suit against governmental bodies in California under either of two theories, one statutory, the other based upon the common law. [citing Code Civ. Proc. §526a]. This provision is to be compared to and contrasted with the common law authority for taxpayer suits [citation omitted] that a ‘taxpayer in his representative capacity can sue a municipality only in cases involving fraud, collusion, ultra vires, or a failure on the part of the governmental body to perform a duty specifically enjoined.’” *Los Altos Property Owners Assn. v. Hutcheon* (1977) 69 Cal.App.3d 22, 26.

88. Section 526a provides in part that “an action to obtain a judgment, restraining and preventing any illegal expenditure of, waste of, or injury to, the ...funds ... of a local agency, may be maintained against any officer thereof, or any agent, or other person, acting in its behalf” by a resident taxpayer, as defined in the statute. This is commonly recognized as a

1 taxpayer suit and it has a strong public policy behind it since the enactment of the statute in
2 1909. The primary purpose of the statute is to “enable a large body of the citizenry to challenge
3 governmental action which would otherwise go unchallenged in the courts because of the
4 standing requirement.” *Id.* at 27, internal citation omitted. The statute is liberally construed to
5 achieve its remedial purpose. *Los Altos Property Owners Assn. v. Hutcheon* (1977) 69
6 Cal.App.3d 22, 27.

7 89. “The essence of a taxpayer action is an illegal or wasteful expenditure of public
8 funds” *McGee v. Torrance Unified School District* (2020) 49 Cal.App.5th 814, 825. As
9 stated in *Ceres v. City of Modesto* (1969) 274 Cal.App.2d 545, 555, “a court must not close its
10 eyes to wasteful, improvident and completely unnecessary public spending, merely because it is
11 done in the exercise of a lawful power.” A claim for taxpayer waste of public funds may also
12 be found where the expenditures provide (1) “no public benefit” or (2) are “totally unnecessary
13 or useless” or (3) “for a plan costing much more than any alternative plans considered, without a
14 finding of any additional public benefit.” *Mohler v. County of Santa Clara* (2023) 92
15 Cal.App.5th 418, 425; *Trim, Inc. v. County of Monterey* (1978) 86 Cal.App.3d 539, 543, citing
16 *Los Altos Property Owners Assn. v. Hutcheon* (1977) 69 Cal.App.3d 22, 30.

17 90. Moreover, “disgorgement of public funds is a remedy available ... in a
18 taxpayer’s action.” *Davis v. Fresno Unified School District* (2020) 57 Cal.App.5th 911, 942.
19 Indeed, almost a century ago, in *Osburn v. Stone* (1915) 170 Cal.480, 482, the California
20 Supreme Court held that section 526a “does not, in letter or in spirit, forbid a taxpayer from
21 seeking to recover, on behalf of his municipality, ...moneys if illegally expended.” *See also*
22 *Blair v. Pitchess* (1971) 5 Cal.3d 258, 268 (citing *Osburn*); *Stanson v. Mott* (1976) 17 Cal.3d
23 206, 210 (state employee “may be held personally liable to repay expended funds” if he failed to
24 exercise due care in authorizing the expenditure of the funds); *Harman v. City and County of*
25 *San Francisco* (1972) 7 Cal.3d 150, 160 (holding that taxpayer may seek “damages in behalf of
26 the city” for the difference between actual value and sale price of the sale of public property);
27
28

1 91. As set forth herein, Van Wagenen recommended that the Riverside County
2 Board of Supervisors approve the Hassen consulting contract on September 17, 2024. The
3 Board of Supervisors did so. Notably, just weeks before, at a Board of Supervisors meeting on
4 August 27, 2024, Board members were clamoring that the cities in the Coachella Valley should
5 build their own animal shelters. *Suddenly, the focus shifted, with Van Wagenen’s engineering,*
6 *that the Board reward Hassen with a multi-million-dollar contract, which, of course, would*
7 *have been completely unnecessary had Van Wagenen not hired Gettis in the first place.*

8 92. *The Hassen contract is an utter waste of taxpayer funds, unnecessary and*
9 *useless, for multiple reasons.* First, as stated above, it would be unnecessary if Van Wagenen
10 had not appointed Gettis in the first place, and instead, appointed someone competent to serve
11 as Director. Second, the contract is duplicative since the Board of Supervisors recently
12 appointed Mary Martin to serve as Director of the Animal Services Department. It is
13 duplicative to pay Martin \$230,000 annually, yet have a \$2,500,000 contract with Hassen
14 performing tasks that are within Mary Martin’s duties. Indeed, the Hassen contract essentially
15 provides that Hassen will serve as a consultant, provide leadership, provide “communications
16 and stakeholder engagement leadership,” provide project management for undefined “projects,”
17 train staff on “collecting and reporting on animal services data,” provide guidance on “customer
18 experience design,” design a “kitten diversion” program, do fundraising, and provide training
19 for “staff, volunteers, and community partners.” All of this is—or will—be done by Martin.
20 Moreover, there is very little, if any, interaction between Hassen and Martin, and Hassen is
21 rarely physically present in the Riverside County animal shelters. In addition, as discussed
22 below, Hassen did a similar evaluation for Los Angeles Animal Services and charged only
23 \$25,000. In sum, the contract is fundamentally wasteful, duplicative, provides no public
24 benefit, is totally unnecessary and useless, and the County is paying much more—100 times
25 more—for Hassen than Los Angeles did. Indeed, since the contract began six months ago,
26 nothing has changed in RCDAS, and in fact, there is an uptick in killing animals for
27 “behavioral” reasons and cats are being turned away at the shelter. These disturbing facts are

1 not worth a \$2.5M windfall to Hassen. Hassen’s fringe approach to animal management, as
2 documented in shelter after shelter, is yet further evidence that the Hassen contract is wasteful,
3 as many other communities have found.

4 93. *Hassen’s animal shelter philosophy is more suited for the 19th century than*
5 *today.* The goal of Hassen is to leave animals on the streets to fend for themselves and die, to
6 take away the ability of the citizens in a community to take the animals to the designated
7 shelter, and to force the community to do the job Animal Services is budgeted to do. Across
8 multiple communities and organizations, Hassen has built a troubling track record of failure,
9 masked by intentional manipulation and self-serving strategies. While she presents herself as a
10 leading figure in the world of animal welfare, her actual influence has left every organization
11 and community she has touched worse off than before, with her pockets full of money intended
12 to help animals and support the people working to protect them. Rather than helping, she has
13 left behind a legacy of harm and despair.

14 94. As Nathan Winograd notes:

15 “At Austin Pets Alive, Hassen was one of the chief architects and promoters
16 of Human Animal Support Services (HASS), urging “shelters” to make
17 pandemic-era closures permanent by turning away stray animals. She also
18 sat on the National Animal Control Association board, which encouraged
19 shelters to re-abandon animals people found on the streets. These policies
20 manipulate intake and placement rates by abandoning the fundamental
21 purpose—indeed the *very* definition—of a shelter; to provide a safety net
22 of care for lost, homeless, and unwanted animals. Under HASS, “Intakes
23 of healthy strays and owner surrenders doesn’t exist anymore,” and there
24 is “No kennel space for rehoming, stray hold or intake.” Instead, the
25 community—whose taxes and donations already pay for shelters—is
26 expected to pick up the slack (hence the euphemism “community sheltering”).”
27
28

1 95. Hassen’s time as Austin Pets Alive serves as a prime example of how her
2 influence can dismantle an entire system. Under her leadership, animals were left on the streets
3 and public safety was severely compromised. To the casual observer, it might have seemed like
4 she was delivering results. However, a deeper look reveals that her “success” was nothing more
5 than a clever manipulation of statistics. She deliberately misled the community to make it
6 appear as though her policies were working when, in reality, they were a disaster. The City of
7 Austin is still dealing with the aftermath of her leadership, forced to clean up the mess she left
8 behind.

9 96. Unfortunately, this was not an isolated incident. Her time at Pima County in
10 Tucson, Arizona, followed the same damaging pattern. Although she touted favorable numbers
11 and promoted her supposed successes, those who looked closer saw a different reality. Shelters
12 were in disarray, animals roamed the streets as strays, and the community faced increased
13 challenges. Her strategies were not about solving problems, but creating the illusion of
14 improvement. She knowingly pushed animals out of shelters and into the community,
15 preferring to reduce shelter numbers at any cost—even if that cost mean sacrificing the welfare
16 of the animals and the safety of the public. These decisions were not mistakes; they were
17 intentional moves to boost her personal reputation, while the community suffered in the long
18 term.

19 97. The Hassen approach predictably leads to litigation which highlights the
20 fundamental danger of her atavistic approach to animal care and safety. In *Bortugno et al., v.*
21 *Pima Animal Care Center, Kristen Auerbach*⁸, *et al.* (Case No. S1100CV201900097) (see link
22 here <https://cloud.wclgportal.com/s/zLMxbBWRBx9Jp2x>), the plaintiffs in the case adopted a
23 Rottweiler named Clarke. Hassen wanted Clarke out of the shelter in order to reduce the intake
24 numbers. Hassen knew Clarke was an aggressive dog since he bit a staff person when being
25 examined. Nonetheless, Hassen wanted to reduce the numbers at the shelter, and agreed to let
26 Clarke be adopted, despite an animal shelter control officer’s concern that Clarke was not

27 _____
28 ⁸ Auerbach was the surname Hassen was using at the time.

1 adoptable because he was aggressive. Two days after his adoption, Clarke bit the plaintiff
2 husband on the face. Two weeks later, Clarke bit the plaintiff wife on the face. This lawsuit
3 was the result.

4 98. Her involvement with the Human Animal Support Services (HASS) initiative
5 during the COVID-19 pandemic further highlights her ability to manipulate a crisis for personal
6 gain. Instead of genuinely supporting municipal animal services during a critical time, she used
7 the pandemic to push her own agenda. She eroded trust in professional municipal animal
8 services, instead relying on unauditable statistics to present false narrative of success. In reality,
9 her actions left communities confused and unprepared, all the while she used the crisis to further
10 her career. This was not an accidental byproduct of her decisions—it was a calculated move to
11 once again inflate her influence and profits, using smoke and mirrors to divert attention from the
12 damage she was causing.

13 99. Similar strategies employed by a group of fringe organizations including Hassen
14 left El Paso, Texas in shambles with pets suffering without aid on the streets. Hassen finds
15 refusing to help pets suffering on the streets not only acceptable but preferred to allowing them
16 the comfort of shelter, nutrition, veterinary care and a home where they are loved. One of
17 Hassen's components of her program is called Finder to Foster or Friendly Finder: people who
18 find a stray can "register" the stray online with the shelter. Hassen states this is successful in
19 getting more lost animals "back home" without that animal having to come into the shelter. She
20 claimed her program had an almost "100%" success rate of registered animals being returned
21 back to their owner/home. In 2023, 3,860 "found animals" were registered with El Paso Animal
22 Services and only 793 "registered animals" made it back home as reported by the finders, far
23 afield of her claim of being close to 100%. The status of the remaining 3,067 animals is
24 unknown. Whether they even survived is unknown since there is no follow-up done by the
25 shelter. In 2023, a total of 4,703 animals within the shelter system are missing/unaccounted
26 for.

1 100. The most disturbing element of Hassen’s career is that these actions were
2 intentional. She is not someone who merely mismanaged responsibilities or failed to
3 understand the complexities of the field. Rather, she actively chose to manipulate statistics and
4 deceive communities to further her own agenda. In each case, her priorities were clear: create
5 favorable optics to advance her career and profit financially off of animals in need, regardless of
6 the harm done to the animals or the people working to help them. This has become especially
7 apparent since she founded her own consulting company, where her primary focus has been
8 personal profit, not the animals or communities she claims to serve. Simply stated, personal
9 profit extracted from taxpayer funds.

10 101. In every organization or community she has influenced, the outcomes are the
11 same. Shelters were left worse off, communities are left to struggle with increased strays, and
12 the animals themselves are left in increasingly dire situations. Her impact has been universally
13 harmful, and the damage she causes is not by accident, but rather by intention. The despair left
14 in her wake is the result of intentional manipulation, with Hassen profiting at every turn while
15 those truly dedicated to animal welfare are left to pick up the pieces.

16 102. It is essential to recognize the danger of allowing a fringe person, Hassen, and
17 her fringe organization, Outcome for Pets Consulting, LLC, to continue influencing municipal
18 animal services. Hassen’s actions demonstrate a clear lack of regard for the animals and
19 communities she pretends to protect, replaced by a relentless pursuit of personal gain and
20 influence. As her track record shows, the communities that place their trust in her suffer the
21 consequences, often for years after her departure.

22 103. True leadership in animal welfare requires accountability, compassion, and a
23 genuine commitment to solving problems, not masking them or pretending they do not exist.
24 Hassen has proven, time and time again, that she is not interested in any of these core values.
25 Instead, she exploits systems, inflates her success, and moves on to the next opportunity—in
26 this case, Riverside County and her \$2,500,000 boondoggle—leaving behind only chaos and
27 despair. The consequences of allowing her to wreak havoc in Riverside County are as obvious
28

1 as they are dangerous, and the costs will be borne by the animals she falsely claims to help and
2 the communities who are forced to expand her bank account through taxpayer funds.

3 104. *Enough is enough, the Hassen contract must be cancelled and restitution to*
4 *Riverside County paid by Van Wagenen for all monies paid under the contract. The contract is*
5 *an extraordinary waste of taxpayer funds. By way of example, the Board of Animal Services*
6 *Commissioners of the City of Los Angeles sought approval to pay Hassen and her LLC \$25,000*
7 *for an assessment of animal services. Somehow, the County of Riverside thought it smart to pay*
8 *100 times what Los Angeles thought was reasonable. It boggles the mind. Further, the contract*
9 *is the result of fraud, collusion, and/or ultra vires conduct, given its nonsensical “sole source”*
10 *claim, as well as the inaccurate and misleading presentation to the Board of Supervisors by Van*
11 *Wagenen.*

12 105. After about a year and a half after Hassen’s program with the El Paso shelters, a
13 group of local rescues presented to the El Paso City Council a letter outlining many of the issues
14 with the HAAS program and noting “[i]t is time to permanently end HASS in the City of El
15 Paso.” (<https://cloud.wclgportal.com/s/4rDGArtFnJiyY2Z>.) The letter gives an example of the
16 failings in El Paso:

17 “Nesa, a rescued dog who was adopted out by one of the local rescues, was lost
18 and picked up by a good Samaritan. This individual tried to take her to Animal
19 Services. Animal Services refused to take Nesa in and instructed the individual
20 that if her could not keep the dog or hold her, then he should release her back
21 on the street. Due to his circumstances he was not able to keep her. Consequently,
22 following the instructions of Animal Services, he released Nesa. The employee at
23 Animal Services did not even both to scan Nesa for a microchip. Nesa was found
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25
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dead a few days later.”



Sadly, Nesa had a microchip, it was registered to the rescue and had the shelter called the rescue, Nesa would have been picked up in less than 15 minutes and would not have taken any kennel space. The good Samaritan explained to shelter staff that he was on his way to work and had no means to care for Nesa. Shelter staff instructed the good Samaritan to release Nesa back into the streets, and stood by and watched as Nesa was let go. Nesa’s body was found two days later, she had been hit by a car and killed, just a few blocks from the shelter. *For Nesa, and dogs like her, the Hassen approach has proved fatal. This callous and inhuman treatment of animals is not what the County of Riverside deserves, and under no calculus is such systematic cruelty worth taxpayer funds of two and one-half million dollars. The animals in our County, and the taxpayers in our community, deserve much better than Hassen’s cold and cruel response to animals in need of help, care and love.*

106. The common theme with municipal shelters that have used Hassen is that the shelter directors have no experience and are unqualified to manage a shelter. That is precisely the situation in Riverside County that Hassen seeks to profit from: Gettis had no experience in animal shelter management; none whatsoever. Hassen manipulated this situation to promote her failed and flawed approach. Unfortunately, municipal management and elected leaders may be just as uninformed—or gullible—as those persons running a shelter. Surprisingly, the Hassen

1 contract—for the enormous sum of \$2,450,000—was given the green light with no substantive
2 discussion, in part because Van Wagenen in his summary to the Board concocted a story about
3 Hassen grounded more in fiction than fact.

4 107. Under the Hassen approach, focused on reducing intake numbers and consulting
5 money, while leaving animals to struggle in the community to face starvation, injury or death,
6 havoc will ensue. The County of Riverside needs to recognize that if Hassen is not booted out
7 of the county, as she or her HAAS approach were in Virginia, Austin, Tucson and El Paso, the
8 community will be placed in danger and the public trust will be profoundly violated. Her
9 approach will have a ripple effect, overburdening the nearby Palm Springs Animal Shelter as
10 more strays will be taken there when refused intake at a Riverside County facility. And, the
11 County of Riverside will need to get ready to defend against the inevitable onslaught of cases
12 that will be filed because of Hassen and her fixation on reducing intake numbers. Riverside
13 County is much larger than any of the communities Hassen previously damaged, and thus, there
14 will be many more aggressive dogs roaming around the community with the potential to injure
15 persons, exposing Riverside County—and its taxpayers—to liability risks.

16 108. Petitioners therefore request that the Court (1) restrain and enjoin Respondent
17 County of Riverside from performing the Agreement between Respondent County of Riverside
18 and Outcome for Pets Consulting, LLC, recommended for approval by Respondent Van
19 Wagenen on September 13, 2024, and approved by the Riverside County Board of Supervisors
20 on September 17, 2024; (2) cancel the Agreement between Respondent County of Riverside and
21 Outcome for Pets Consulting, LLC, pursuant to paragraph 5.1 of the Agreement; and (3) compel
22 restitution by Respondent Van Wagenen to Respondent County of Riverside of all monies paid
23 by Respondent County of Riverside pursuant to the Agreement between County of Riverside
24 and Outcome for Pets Consulting, LLC.



SEVENTH CAUSE OF ACTION

Taxpayer Suit pursuant to Code Civ. Proc. §526a and Common Law – Gettis Employment Contracts

(Against All Respondents)

109. Petitioners reallege and incorporate all allegations herein as if fully set forth in this cause of action.

110. Simply stated, Gettis was uniquely unqualified for the position of Director of RCDAS since she had no education or experience relevant to the position. *Under any calculus, her appointment by Van Wagenen was wasteful, improvident and completely unnecessary public spending.* Gettis had no prior education, work experience or background in animal welfare, animal behavioral science or shelter management when Van Wagenen appointed her on March 10, 2022. Gettis had a Bachelor's degree in Architectural Studies and a Master's degree in Architecture. Her work experience before arriving at RCDAS consisted of the following:

- * November 2003 – March 2005: Historic Preservation Manager, City of San Juan Capistrano;
- * March 2005 – January 2006 – County Historic Preservation Officer, Riverside County Regional Parks and Open-Space District;

* January 2006 – February 2018 – City of Riverside, Division Manager-
Neighborhood Engagement Division (March 2013 – February 2018), Principal Planner
(March 2011 – February 2013), City Historic Preservation Officer (January 2006 –
March 2011)

* March 2018 – March 2022 – Riverside County Regional Parks and Open-Space
District, Bureau Chief – Planning and Development (March 2018 – December 2019);
Assistant Director (December 2019 – March 2022).

111. In sum, Gettis’ work history is essentially Parks and Rec. That is the extent of it.
Before becoming Director of RCDAS in March 2022, she had absolutely no experience with
animal care, animal welfare, shelter management or animal advocacy *let alone being entrusted
to run an organization with a 39-million-dollar budget.* Gettis’ lack of qualifications, training,
education and experience played an inordinate role in giving RCDAS the dubious distinction of
being an animal shelter with the highest kill rate among reporting shelters *in the entire United
States* ([https://www.linkedin.com/in/erin-gettis-
03419020?utm_source=share&utm_campaign=share_via&utm_content=profile&utm_medium=
ios_app](https://www.linkedin.com/in/erin-gettis-03419020?utm_source=share&utm_campaign=share_via&utm_content=profile&utm_medium=ios_app))

112. Nonetheless, Gettis was appointed in a secretive and opaque manner. She was
not appointed by the County of Riverside Board of Supervisors nor were any public hearings
held relating to the position of Director of RCDAS or her employment by the County of
Riverside. Instead, Gettis was appointed to the position of RCDAS Director by Van Wagenen,
effective March 10, 2022. As Van Wagenen made the hiring decision, there was no associated
agenda item at a Board of Supervisors meeting or approval of her appointment. *By comparison,
Mary Martin, the replacement Director for Gettis, was appointed by the Riverside County
Board of Supervisors, on February 4, 2025.* Van Wagenen’s crafty appointment of Gettis—and
avoiding transparency—is yet further evidence of wasteful, improvident and completely
unnecessary public spending.

113. Interestingly, the Riverside County Board of Supervisors approved Van

Wagenen’s original employment contract in February 2021. (See link here <https://cloud.wclportal.com/s/fgc7HZ62ADmoc2q>.) The contract identifies essential duties which, in essence, include administrative, budgetary, and planning responsibilities. While it does state that the duties are not limited to those listed, *nowhere does it state in the contract that Van Wagenen would have any responsibilities for hiring the Director of Animal Services, hiring an Executive Director for RUHS, or indeed, any management hiring whatsoever*. Similarly, the current employment contract, entered into on December 12, 2023, does not state that Van Wagenen would have any responsibility for hiring an Executive Director for RUHS, promoting someone to that position, or any management hiring whatsoever.⁹ (See link here <https://cloud.wclportal.com/s/aaGs4Jw5jNmc6E2>.)

114. The lack of transparency in the hiring of Gettis as Director of RCDAS—for a position as the head of a county department with a 39-million-dollar-budget, and given her remarkable absence of any qualifications for the position—would be inexplicable except for the favoritism Van Wagenen bestowed on Gettis because her husband was Chief Deputy County Counsel for Riverside County. This is a plain violation of Riverside County policy that hiring is based on “merit and ability.” *Does it make any sense that the most qualified candidate for the position was someone with a degree in architecture with no background in animal services and shelter management, and no qualifications for the position, and whose spouse, coincidentally, was County Counsel?* Given all of this, “wasteful spending” does not begin to describe the appointment of Gettis.

⁹ Paragraph 3B on the contract provides that if the County terminates the contract, Van Wagenen is entitled to severance compensation “in an amount equal to one month of compensation for each month remaining on the [contract],” not to exceed twelve months. The contract is for three years until December 11, 2026. According to Transparentcalifornia.com, Van Wagenen’s total pay and benefits for 2023 are \$468,880.02. Accordingly, in the event the County of Riverside terminates the employment contract with Van Wagenen, it should ensure that any severance compensation under the employment contract be reduced by the restitution sought in this action for Van Wagenen’s waste of taxpayer funds relating to 1) the hiring of Gettis as Director of RCDAS, 2) the promotion of Gettis as Executive Director, RUHS, 3) the Hassen consulting contract, and 4) the rampant nepotism in RCDAS. It would be affront to the taxpayers of Riverside County, not to mention a violation of the public trust, for taxpayers to subsidize Van Wagenen’s financial windfall under the contract, given his profligate waste of public funds, based on fraud, collusion and *ultra vires* acts.

115. According to public records, for 2022, Gettis received total pay of \$202,670.34, and total pay and benefits of \$255,621.29. For 2023, Gettis received total pay of \$221,867.73, and total pay and benefits of \$278,216.02. In other words, in just one year, she received close to a 10% increase in total pay and benefits.

116. During this time, as set forth herein, RCDAS suffered from a lack of leadership, mismanagement, budget opacity, flouting of the Hayden Act, disregard for the health and safety of animals under its care, disinterest in working with the community and rescue organizations to place animals in homes, lack of veterinary care for the animals under its care, killing adoptable animals, or animals that could be made adoptable with reasonable efforts, in violation of the Hayden Act, keeping inaccurate records that, for example, labeled animals as having “behavioral” problems when they did not, then using that false label as an excuse to kill them, and brazen nepotism.

117. The secretive appointment of Gettis constitutes a waste of taxpayer funds since it was a useless expenditure of public funds with no public benefit. Gettis had no experience or qualifications in animal control or shelter operations. Notably, the County of Riverside Position Brochure for Animal Services Director for Gettis’ replacement (<https://cloud.wclgportal.com/s/mg6Kczb4kDPWFQS>) makes it crystal clear what qualifications are essential for this position:

“Bachelor’s degree from an accredited college or university, preferably with a major in business or public administration, or a closely related field is required.

Master’s degree from an accredited college or university with a major in business of public administration, or a closely related field is preferred.

...

Over four years of experience in a management or administrative capacity in a public or private organization involved in animal control and shelter operations.”

(Emphasis added.)

1 The Position Brochure also notes that “[r]esumes should reflect years and months of positions
2 held, as well as size of staff and budgets you have managed.” (Emphasis in the original.)

3 118. Gettis, as discussed above, lacked both the education and experience
4 qualifications set forth in the Position Brochure for her replacement. These requisite
5 qualifications, of course, were as critical in 2022 when Gettis was hired as they are now in 2024
6 when Respondent County of Riverside is looking for her replacement. The difference being that
7 Gettis was appointed by Van Wagenen outside the public eye, with no public vetting, and no
8 input by the Board of Supervisors, and, coincidentally, with her spouse being the County
9 Counsel for the County of Riverside at the time.

10 119. As a result of the imprudent hiring of Gettis with no public benefit, Van
11 Wagenen and the County of Riverside have wasted approximately \$500,000 in taxpayer funds
12 to pay Gettis as Director of RCDAS when she had no experience, no qualifications,
13 mismanaged RCDAS (which led to other wasted taxpayer funds, such as the cost of killing so
14 many animals), and *then was removed as Director fourteen days after this action was filed*.

15 120. This waste of taxpayer funds was anything but a “mistake” by Van Wagenen and
16 the County of Riverside, but rather was totally unnecessary, useless and imposed significant
17 additional costs without any public benefit. *See e.g., Mohler v. County of Santa Clara* (2023)
18 92 Cal.App.5th 418424-425. The costs include searching for, and hiring, a new Director, and
19 “promoting” Gettis to a new position in the County of Riverside when she should have been
20 terminated. In fact, this was, as noted in *Ceres, supra*, 274 Cal.App.2d 545, 555, classic
21 wasteful and improvident spending. Providing compensation to someone with absolutely no
22 education, experience or skills for the position, but who, nonetheless, was hired and given a
23 salary and benefits of over a quarter million dollars annually, is wasteful, unnecessary and
24 useless. Moreover, the hiring of Gettis was not only a waste of taxpayer funds, but also a result
25 of fraud, collusion, and/or ultra vires conduct, based on the undisputed lack of experience and
26 qualifications for the position, as well as the fact that the hiring of Gettis violated the County of
27

1 Riverside Human Resources Employee Handbook (“Handbook”) which requires that
2 appointments be based on “merit and ability.” Handbook, at p. 40.

3 121. As if the wasteful spending of taxpayer funds to appoint Gettis was not enough,
4 on September 4, 2024, she announced she had received a “promotional opportunity” with the
5 County of Riverside, evidently, thanks to Van Wagenen—the County representative who
6 improvidently hired her in the first place and who is now subjecting taxpayers to the additional
7 waste of public funds.

8 122. That “promotional opportunity” turned out to be a position as Executive
9 Director, Riverside University Health System. It is unknown if this “Executive Director”
10 position even existed before Gettis was hired for it; however, its description is characterized by
11 a nebulous word salad that is difficult to comprehend:

12 With support of County of Riverside's Assistant County Executive Officer (ACEO) and
13 County Administration, the Executive Director, RUHS for General Administration will
14 conduct administrative studies or research studies and recommend to the RUHS-MC
15 CEO or similar executive management, and governing boards, the formulation, revision,
16 and implementation of policies, procedures, programs and strategies to achieve effective
17 collaboration with the County's centralized procurement, human resources, and
18 legislative functions. The incumbent will further provide executive oversight in the
19 development of strategic plan, legislative analyses/proposals, procurements, research
20 and grant development, and contract monitoring. Depending on the area of oversight, the
21 Executive Director, RUHS may also serve as the department designee on a variety of
22 government relations matters, attend community and governmental events, serve on
23 various committees, and manage community engagement by developing key
24 relationships at all levels with community stakeholders and community-based
25 organizations.

26 ([https://www.governmentjobs.com/careers/riverside/classspecs/1209912?keywords=exe](https://www.governmentjobs.com/careers/riverside/classspecs/1209912?keywords=executive%20director&pagetype=classSpecifications)
27 [cutive%20director&pagetype=classSpecifications](https://www.governmentjobs.com/careers/riverside/classspecs/1209912?keywords=executive%20director&pagetype=classSpecifications).)

3 sentences containing 140 words which do very little to explain the position.

123. Even more than the byzantine job description is the education requirement for this health care/patient management position. The required degrees are in business, nursing, healthcare, public administration—and *architecture and engineering*! It is difficult to understand how a degree in architecture would be helpful in a position that “assists the RUHS-MC executive management in the administration and operation of the Riverside University Health System Medical Center (RUHS-MC) and integrated ambulatory health services, including the Community Health Centers (CHC’s) and hospital-based clinics; conducts administrative studies or research studies and advises executive management and governing boards on the formulation and revision of RUHS policies, programs and strategies” Yet, there is the hook for Van Wagenen, the County of Riverside and Gettis—she has a degree in architecture.

124. As with the Director position with RCDAS, this web of deceit was carried out secretly and with no public discussion. Curiously, Gettis described it only as a “promotional opportunity” when she announced it on September 4, 2024. No item was placed on the agenda for discussion at a Board of Supervisors meeting nor did the Board of Supervisors address this “promotional opportunity” after Gettis has removed, moved, and/or resigned as Director of RCDAS.

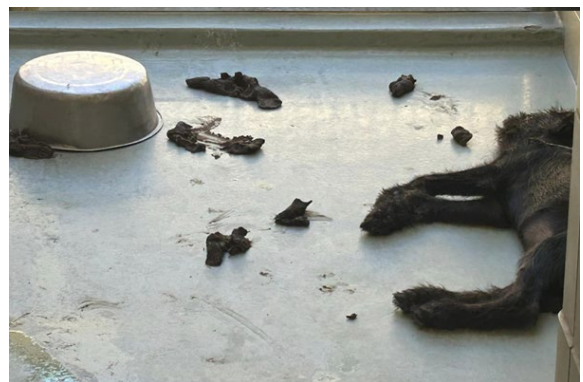
125. This is yet more wasteful, improvident and completely unnecessary public spending. Wasting taxpayer money—likely as much, if not more, than what Gettis was making as Director of RCDAS—on a position apparently made up specifically for Gettis to move her out of RCDAS and hope that takes care of the problem, is a plain violation of Code Civ. Proc. §526a. Further, based on the absence of any qualifications for the position, the “promotion” was based on fraud, collusion, and/or ultra vires conduct. The County of Riverside Human Resources Employee Handbook (“Handbook”) requires that promotions be based on “merit and ability.” Handbook, at p. 40. This one plainly was not.

126. *This cavalier, and frankly corrupt, action by Van Wagenen to force Riverside County taxpayers to subsidize the salary for Gettis, who was yet again gifted a position she is unqualified for, plainly contravenes Van Wagenen's duties of public trust owed to each and every taxpayer in Riverside County.* This conduct by Van Wagenen is far afield of the requisite fiduciary duties and good faith owed to the community and taxpayers in the County of Riverside. It is yet another waste of taxpayer money by Van Wagenen in attempt to "fix" the problem *he* created by hiring Gettis in the first place.

127. Petitioners therefore request that the Court restrain and enjoin Van Wagenen, County of Riverside and Gettis from the wasteful expenditure of taxpayer funds with respect to the payment of salary or other benefits to Gettis as Director of RCDAS and as Executive Director, Riverside University Health System Medical Center.

128. Petitioners further request that the Court compel restitution by Respondent Van Wagenen and Respondent Erin Gettis to Respondent County of Riverside of all monies paid by Respondent County of Riverside pursuant to the agreement between Respondent County of Riverside and Respondent Erin Gettis for her employment as Executive Director, Riverside University Health System Medical Center.

129. Petitioners further request that the Court compel restitution by Respondent Van Wagenen and Respondent Erin Gettis to Respondent County of Riverside of all monies paid by Respondent County of Riverside pursuant to the agreement between Respondent County of Riverside and Respondent Erin Gettis for her employment as Director, Riverside County Department of Animal Services.



EIGHTH CAUSE OF ACTION

**Taxpayer Suit pursuant to Code Civ. Proc. §526a and Common Law –
RCDAS Employee Nepotism**

(Against All Respondents)

130. Petitioners reallege and incorporate all allegations herein as if fully set forth in this cause of action.

131. Nepotism is defined as an employee’s use of influence or power to hire, transfer, or promote someone because of a personal relationship which may include a familial relationship by (1) blood, (2) adoption, (3) marriage, whether that marriage is a current or former one, (4) domestic partnership, or, (5) cohabitation. Nepotism occurs when those with the power to make employment-related decisions favor their family or friends, over others, without regard to merit. Nepotism is a serious issue in the workplace since it can (1) reduce worker morale, (2) increase turnover, (3) decrease productivity, (4) diminish employee loyalty to the employer, (4) make employees care less about the quality of their work, if personal relationships govern positions, and (5) create poor management personnel.

132. California regulates and defines nepotism in the state civil service. Cal. Code Regs. Title 2, § 87 – Anti-Nepotism provides: “Appointing powers shall hire, transfer, and promote all employees on the basis of merit and fitness in accordance with civil service statutes, rules and regulations. Nepotism is expressly prohibited in the state workplace because it is antithetical to California’s merit based civil service system.” § 87 further provides that “[a]ll appointing powers shall adopt an anti-nepotism policy that includes ...(1) A statement that the appointing power is committed to merit-based hiring and that nepotism is antithetical to a merit-based civil service system.” Counties in California have the authority to establish their own employment policies and practices, and the substance of this regulation applicable to state employees has, in essence, been adopted by the County of Riverside in its 75-page County of Riverside Human Resources Employee Handbook (“Handbook”).

133. Respondent Van Wagenen states in the Handbook that “[t]he Executive Office is the operational and administrative oversight department for the County of Riverside government

1 and seeks to provide vision, leadership, and coordination for all county departments.”

2 Handbook, at p. 2. *The Handbook provides that hiring and promotions be based on “merit and*
3 *ability.”* Handbook, at p. 40. In other words, hiring and promotion decisions are not to be
4 grounded in nepotism and favoritism.

5 134. Despite the Handbook’s stated policy, nepotism is rampant at RCDAS. To give
6 some examples, Luis Rosa, Lieutenant of Field Services for Riverside County Animal Services,
7 is married to Marisa Sanabria, Animal Services Manager (formerly Supervising Animal Care
8 Technician) at Coachella Valley Animal Campus (“CVAC”); Damien Cruz, the Supervising
9 Animal Services Counselor at CVAC (formerly Animal Care Technician), is their nephew; and
10 Stephanie Castaneda, Senior Animal Care Technician at CVAC, is their daughter-in-law.
11 Interestingly, Mr. Cruz and Ms. Castanda were hired at the same time in October 2016.
12 According to his LinkedIn profile, one of his first job duties was to “[p]erform humane
13 euthanasia.” He plainly was not qualified for that duty, given his stated prior employment as a
14 busboy in a restaurant and co-manager at Little Caesars Pizza, and as importantly, euthanasia is
15 generally performed by a licensed veterinarian, or at the very least, under the supervision of a
16 licensed veterinarian, and not by someone with a background in restaurant work. Neither Mr.
17 Cruz or Ms. Castaneda are licensed as veterinary technicians.

18 135. Four family members employed in the same Animal Services Department is,
19 quite simply, classic nepotism. After Luis Rosa was hired in 2011, all of the remaining family
20 members were hired because of nepotism and not based on the Handbook’s requirement of
21 “merit and ability.” All of the hiring and promotion decisions were grounded in nepotism and
22 favoritism, and not “merit and ability.” The compensation for these family members is off the
23 charts and grossly disproportionate to the job. Most recent public disclosure of total pay and
24 benefits reveals the following: Luis Rosa - \$139,871; Marisa Sanabria – \$98,642; Damien Cruz
25 - \$76,871; Stephanie Castaneda - \$71,243. These individuals were hired with little or no
26 education or experience, had no animal welfare experience when hired, and would not receive
27 this level of compensation but for nepotism. As one whistleblower stated with respect to the
28

1 nepotism: “[T]he favoritism is ridiculous. Work place morale and ethic[s] is going down the
2 drain with their family running the place. The worst part is how upper management knows yet
3 they do nothing.” This conduct is a violation of the Riverside County’s commitment to hire and
4 promote based on “merit and ability”—which are nothing more than empty words, given the
5 blatant nepotism at RCDAS.

6 136. This inexcusable—and legally impermissible—nepotism destroys employee
7 morale, perpetuates favoritism in the workplace, leads to overlooking of discipline issues,
8 damages employee work ethic, leads to biased and meritless promotional opportunities, and
9 perhaps worst of all, is condoned by upper management who does nothing, thereby sending the
10 message to all other employees that they are, and will be, treated far differently than the family
11 “favorites.”¹⁰ Favoritism, cronyism, and preferential employment opportunities do not belong
12 in the workplace.

13 137. Respondent County of Riverside, as a public agency, undermines the public trust
14 and wastes taxpayer funds when it engages in nepotism, and indeed, promotes unfair hiring
15 practices, favoritism and cronyism. Further, favoritism and cronyism are grounded in
16 fraudulent actions, collusion and/or ultra vires conduct since they are not based on merit, and
17 misrepresent or conceal the nepotism between the person in power who makes the hiring
18 decision based not on merit, but on favoritism and nepotism.

19 138. Petitioners therefore request that the Court restrain and enjoin Van Wagenen,
20 County of Riverside and RCDAS from the wasteful expenditure of taxpayer funds with respect
21 to the payment of salary or other benefits to RCDAS employees hired through nepotism, and
22 establish an anti-nepotism policy for the County of Riverside.

23 ///

24
25 ¹⁰ As discussed herein, there is a parallel to the nepotism at RCDAS with the hiring of
26 Respondent Gettis as Director of RCDAS—with no experience in animal services, and to her
27 “promotional opportunity” with Riverside University Health System, again with no experience
28 in patient or health care management—while her husband during this time frame served as
County Counsel for the County of Riverside. Given the example set by County management, it
is hardly surprising to see pervasive nepotism at RCDAS.

139. Petitioners further request that the Court compel restitution by Respondent Van Wagenen and Respondent Erin Gettis to Respondent County of Riverside of all monies paid by Respondent County of Riverside to RCDAS employees hired through nepotism.

PRAYER FOR RELIEF

WHEREFORE, Petitioners respectfully request that this Court:

1. Issue a Writ of Mandate and Order for Injunctive Relief directing Respondents to cease violating the law, including the Hayden Act, Riverside County Code of Ordinances §6.08.120, and Code Civ. Proc. §526a, as set forth herein, and further, compelling Respondents to take the following actions:

(a) Restrain and enjoin Respondent County of Riverside from performing the Agreement between Respondent County of Riverside and Outcome for Pets Consulting, LLC, recommended for approval by Respondent Van Wagenen on September 13, 2024, and approved by the Riverside County Board of Supervisors on September 17, 2024;

(b) Cancel the Agreement between Respondent County of Riverside and Outcome for Pets Consulting, LLC, recommended for approval by Respondent Van Wagenen on September 13, 2024, and approved by the Riverside County Board of Supervisors on September 17, 2024, pursuant to paragraph 5.1 of the Agreement;

(c) Compel restitution by Respondent Van Wagenen to Respondent County of Riverside of all monies paid by Respondent County of Riverside pursuant to the Agreement between County of Riverside and Outcome for Pets Consulting, LLC, recommended for approval by Respondent Van Wagenen on September 13, 2024, and approved by the Riverside County Board of Supervisors on September 17, 2024;

(d) Restrain and enjoin Respondent County of Riverside from performing the agreement between Respondent County of Riverside and Respondent Erin Gettis for her employment as Executive Director, Riverside University Health System Medical Center;

1 (e) Terminate the agreement between Respondent County of Riverside and
2 Respondent Erin Gettis for her employment as Executive Director, Riverside University Health
3 System Medical Center;

4 (f) Compel restitution by Respondent Van Wagenen and Respondent Gettis
5 to Respondent County of Riverside of all monies paid by Respondent County of Riverside
6 pursuant to the agreement between Respondent County of Riverside and Respondent Erin Gettis
7 for her employment as Executive Director, Riverside University Health System Medical Center;

8 (g) Compel restitution by Respondent Van Wagenen and Respondent Erin
9 Gettis to Respondent County of Riverside of all monies paid by Respondent County of
10 Riverside pursuant to the agreement between Respondent County of Riverside and Respondent
11 Erin Gettis for her employment as Director, Riverside County Department of Animal Services;

12 (h) Restrain and enjoin Respondents County of Riverside, RCDAS and Van
13 Wagenen from the wasteful expenditure of public funds with respect to the payment of salary or
14 other benefits to RCDAS employees hired through nepotism, and establish an anti-nepotism
15 policy for the County of Riverside;

16 (i) Compel restitution by Respondents Van Wagenen and Gettis of all
17 monies paid by Respondent County of Riverside to RCDAS employees hired through nepotism;

18 (j) Cease the killing of adoptable animals in violation of the Hayden Act;

19 (k) Cease the killing of animals that could become adoptable with reasonable
20 efforts in violation of the Hayden Act;

21 (l) Hire a forensic auditor to review the RCDAS budget, and all financial
22 data and records of RCDAS;

23 (m) Hire veterinarians to be present full-time at each of the three larger
24 facilities for daily routine and emergency care, and additional qualified kennel attendants;

25 (n) Cease any current temperament/behavior assessments evaluating whether
26 a dog or cat is to be killed since such assessments are currently conducted in an improper and
27 negligent manner;

1 (o) Hire qualified personnel to perform temperament/behavior assessments of
2 animals to determine whether they are adoptable or could be made adoptable with reasonable
3 efforts;

4 (p) Cooperate with qualified rescue organizations and adoption
5 organizations, and promptly release animals to a qualified organization in accordance with the
6 Hayden Act;

7 (q) Cease any “euthanasia” date upon notification of interest by an
8 individual, rescue organization or adoption organization;

9 (r) Commence programs that educate kennel staff and volunteers on how to
10 interact and care for animals to increase their adoptability;

11 (s) Provide animals in the custody of RCDAS with necessary and prompt
12 veterinary care, nutrition, shelter, and treat them kindly, as required by law;

13 (t) Require a licensed veterinarian to sign a declaration under oath attesting
14 to his/her opinion that “euthanasia” is medically warranted and sets forth, in detail, the factual
15 basis for that opinion;

16 (u) Maintain accurate and truthful records for all animals under the care of
17 RCDAS;

18 (v) Replace current staff who do not follow the Hayden Act and do not act in
19 the best interests of the animals under their care;

20 (w) Provide animals with proper nutrition and water, clean kennels and
21 regular exercise, on at least a daily basis;

22 (x) Spay and neuter all animals in the custody of RCDAS before adoption or
23 release, pursuant to Riverside County Code of Ordinances §6.08.190(a) or (b); and

24 (y) Appoint a monitor to oversee compliance and report findings back to the
25 Court on a schedule deemed appropriate by the Court;

26 2. Award Petitioners all costs incurred in this action;

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1 3. Award Petitioners reasonable attorney fees, pursuant to *Code of Civil Procedure*
2 §1021.5; and

3 4. Award Petitioners such other and further relief as the Court deems just and
4 proper.

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6 DATED: April 23, 2025

WALTER CLARK LEGAL GROUP

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8 By: *Dan C. Bolton*
9 Dan C. Bolton
10 Attorneys for Petitioners
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VERIFICATION

I, David Kirk, declare:

I am a Petitioner in this action.

I have read the foregoing SECOND AMENDED PETITION FOR WRIT OF MANDATE; SECOND AMENDED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF and know its contents. The same is true of my own knowledge, except as to those matters which are stated on information and belief, and, as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 23, 2025, at Palm Desert, California.

David Kirk
David Kirk

VERIFICATION

I, Lisa Blodgett, declare:

I am a Petitioner in this action.

I have read the foregoing SECOND AMENDED PETITION FOR WRIT OF MANDATE; SECOND AMENDED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF and know its contents. The same is true of my own knowledge, except as to those matters which are stated on information and belief, and, as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 22, 2025, at La Quinta, California.


Lisa Blodgett

VERIFICATION


I, Tiffani LoBue, declare:

I am a Petitioner in this action.

I have read the foregoing SECOND AMENDED PETITION FOR WRIT OF MANDATE; SECOND AMENDED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF and know its contents. The same is true of my own knowledge, except as to those matters which are stated on information and belief, and, as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 22, 2025, at Palm Springs, California.



Signed with DocuBee — 7b9b6cd32c8f

Tiffani LoBue

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF RIVERSIDE

I am employed in the County of Riverside, State of California. I am over the age of 18 and not a party to the within action; my business address is 71-861 Highway 111, Rancho Mirage, California 92270.

On 4/23/2025, I served the foregoing document(s) described as **SECOND AMENDED PETITION FOR WRIT OF MANDATE; SECOND AMENDED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF and SECOND AMENDED SUMMONS** on the interested parties in this action by addressed as follows:

Christopher D. Lockwood Arias & Lockwood 1881 S. Business Center Drive, Suite 9A San Bernardino, CA 92408 christopher.lockwood@ariaslockwood.com ; sharvonne.sulzle@ariaslockwood.com	Counsel for Respondents Erin Gettis, Riverside County Department of Animal Services, and County of Riverside
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(X) VIA ELECTRONIC TRANSMISSION. I caused the above-referenced document(s) to be transmitted by email. I am “readily familiar” with this office’s practice for transmissions by email. Under that practice transmissions are sent as soon as possible and are repeated, if necessary, until they are reported as complete and without error. In sending the foregoing document(s) by email, I followed this office’s ordinary business practices. The sending email address is jgordon@walterclark.com.

Executed on 4/23/2025, at Rancho Mirage, California. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.


Jennifer Gordon