

□ REPLY TO

COACHELLA VALLEY OFFICE

MAIN OFFICE

71-861 HIGHWAY 111,

RANCHO MIRAGE,

CALIFORNIA 92270

TEL 760-862-WCLG (9254)

FAX 760-862-1121

VICTOR VALLEY OFFICE

12138 INDUSTRIAL BOULEVARD,

SUITE 230

VICTORVILLE,

CALIFORNIA 92395

FAX 760-862-1121

EI CENTRO OFFICE

1503 NORTH IMPERIAL AVENUE

SUITE 202

EL CENTRO,

CALIFORNIA 92243

FAX 760-862-1121

TOLL FREE

1-760-777-7777

E-MAIL,

Info@WalterClark.com

WEBSITE,

www.WALTERCLARK.com

July 20, 2026

VIA ELECTRONIC TRANSMISSION ONLY

Christine Renshaw
Assistant County Counsel
800 South Victoria Avenue
Ventura, CA 93009
Christine.Renshaw@venturacounty.gov

Re: *Santa Paula Animal Rescue Center, Inc. v. County of Ventura, et al.*
Ventura County Superior Court Case No. 2026CUWM067714

Dear Ms. Renshaw:

Thank you for your telephone call this morning concerning the demurrer and your acknowledgment of my letter of July 15, 2026, regarding my desire for a simple, decent, humane and lifesaving solution to the pending litigation over the “model citizen” Bruce by releasing him to Santa Paula Animal Rescue Center. You indicated you would convey my thoughts to “your client.”

I am sure you are aware of the Ventura County Bar Association Guidelines on Professional Conduct and Civility. Specifically with respect to dispute resolution, the Guidelines state that counsel will “[e]ngage in good faith efforts to settle disputes and not as a means of adjourning, terminating discovery, or delaying the proceeding.”

As I stated in my July 15th letter—and reiterate once again—I am willing to meet in-person with you, Mr. Rodriguez, a representative from the Board of Supervisors, or any other County representative, to discuss working towards a resolution to save, rather than kill, the “model citizen” Bruce.

On another matter discussed at our recent Case Management Conference, I would like to take the deposition of Mr. Rodriguez. (There may be several other depositions needed.) Discovery is proper in both administrative and traditional mandate proceedings. *See e.g., Creed-21 v. City of Wildomar* (2017) 7 Cal.App.5th 690 (discovery allowed in administrative mandate action); *City of Los Angeles v. Superior Court* (2017) 7 Cal.App.5th 946 (discovery permitted in traditional mandate action).

This is a critical deposition for the case. Key factual issues in the case include: 1) the steps the County took to determine Bruce's owner, 2) what contact the County had with SPARC about Bruce, 3) the County's knowledge of SPARC as an owner, or having ownership interests in, Bruce, 4) what was discussed in the telephone conversation the County initiated with SPARC after Bruce was placed in the shelter, 5) what steps were taken to notify SPARC of the administrative and court hearings, and 6) if no steps were taken, why not—particularly given VCAS' knowledge of SPARC's asserted ownership interests in Bruce and Ventura County's longstanding relationship with SPARC? While I suspect you will argue this petition presents solely an issue of law, it does not since these factual issues help frame the application of the law, particularly given the public policy of the Hayden Act to save, not kill, shelter animals.

A related issue, of course, is the June 17, 2025 Ventura County Grand Jury Investigation regarding Ventura County Animal Services Commission. One of the eight recommendations of the Grand Jury was "Ventura County Animal Services' re-engagement with local rescue and foster groups" It is worth noting that multiple efforts were made to resolve this case without killing Bruce. Santa Paula Animal Rescue Center was the first option presented and has remained available throughout. Mr. Rodriguez rejected it. Dogtown Ranch was discussed as another placement for Bruce. Mr. Rodriguez rejected it. West Coast Cane Corso was another option. Mr. Rodriguez rejected it. SPARC remains willing to fund Bruce's placement with any qualified rescue sanctuary, but Mr. Rodriguez has rejected every lifesaving proposal. This is shameful.

Simply stated, the "re-engagement" urged by the Grand Jury has been ignored by Mr. Rodriguez. Perhaps we should not be surprised. He left his position with the Seattle Animal Shelter blaming "staff, volunteers, and Seattle Animal Shelter Foundation board members" in his resignation letter as leading to his departure. Despite this cloud over his departure, Ventura County Animal Services hired him shortly thereafter. Mr. Rodriguez seems more comfortable engaging in the "blame game" rather than focusing on the management of shelter animals in his custody, consistent with California's stated public policy in the Hayden Act. Indeed, despite his short time at Ventura County, he has acted punitively against several rescues and volunteers.

In the event you are unwilling to produce Mr. Rodriguez for a deposition, we can proceed with an Informal Discovery Conference, though I would hope we can resolve this without court intervention.

Ms. Christine Renshaw

July 20, 2026

Page 3

I trust you will share this letter with County management and the Ventura County Board of Supervisors since they surely need to know how this case is being managed by Mr. Rodriguez and the County, as well as the simple and lifesaving resolution that Santa Paula Animal Rescue Center has proposed all along.

It is obvious that the County's treatment of Bruce has resounded with so many people. I know in speaking with community members about Bruce and seeing the outpouring of love and support for him at the shelter, on social media, and in the animal advocacy community, that a lifesaving solution for Bruce is the right thing to do, both morally and legally. *See e.g.*

<https://news.nathanwinograd.org/p/the-battle-to-save-bruce-continues>

<https://news.nathanwinograd.org/p/the-court-battles-to-save-bruce-and>

The unyielding insistence that Bruce must die—when Santa Paula Animal Rescue Center is willing to take Bruce—makes no sense. As Mr. Winograd observes: “It is not right to kill an animal who has an appropriate and safe environment for them. Bruce—described by the very agency seeking his destruction as a ‘model citizen’—deserve[s] an opportunity for life and happiness.”

I look forward to hearing from you regarding what steps the County and Mr. Rodriguez are willing to take to conclude this case and allow the shelter's “model citizen” to leave his kennel of four months for a new life of love and happiness.

Sincerely,

Walter Clark Legal Group

/s/ Dan C. Bolton

Dan C. Bolton