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July 24, 2026

VIA ELECTRONIC TRANSMISSION ONLY

Ms. Kelly Duncan
Manning & Kass Ellrod, Ramirez, Trester LLP
801 South Victoria Avenue
Los Angeles, CA 90017-3012
Kelly.Duncan@manningkass.com

Re: *Santa Paula Animal Rescue Center, Inc., et al. v. Ventura County, et*
C.D. Cal. Case No. 2:26-cv-05196-SPG-E

Dear Ms. Duncan:

Given 1) the preservation of Bruce is in issue in both the state court writ of mandate action and the federal action, 2) the Notice of Related Cases filed by the County, and 3) Central District L.R. 16-15, I am sending you my recent letters to Ms. Renshaw. I have not received a substantive, or indeed any, response from the County in the state court action. It is troubling that Bruce's life is being toyed with in this manner when a simple lifesaving solution exists.

A global resolution of this litigation that will save Bruce's life, and allow the shelter's "model citizen" to be transferred to Santa Paula Animal Rescue Center, is the reasonable and humane alternative. It is the right thing to do, both morally and legally.

It has not escaped my attention that Mr. Rodriguez was given a second chance when VCAS hired him shortly after Seattle stakeholders had enough of his management. Yet, he decided Bruce, the "model citizen" at the shelter is not worthy of another chance and deserves to be killed. This, despite the fact that, as discussed below, VCAS has transferred other dogs whose documented behavior was far worse than Bruce's, Bruce has been an exemplary "model citizen" at the shelter, and VCAS is well aware that "Bruce supporters" (of which there are many) have been "feeding Bruce snacks" *with no incidents from this "model citizen."* Indeed, Mr. Rodriguez just recently transferred two dogs, deemed aggressive and unable to be safely handled, to SPARC.

By way of background, SPARC has a long history with VCAS and has been a rescue partner in good standing since SPARC's inception. VCAS has transferred dozens of dogs to SPARC this year alone, many of them large-breed dogs with medical, behavioral, or other special needs. Thor and Phoenix are simply the newest examples. VCAS described Thor, now known as Henry at SPARC, as an approximately 75- to 80-pound American Bulldog/Mastiff mix who had bitten an officer's hand, charged, growled, snapped, attempted to bite, remained unsafe for routine handling, required tools, made no meaningful progress despite daily desensitization attempts, and had a guarded-to-poor prognosis. VCAS deemed Thor unplaceable and euthanasia-eligible. VCAS nevertheless transferred Thor to SPARC under a written waiver requiring further assessment, remedial training, prudent management, disclosure of his history, assumption of risk, and indemnification of the County. Thor had no issue at SPARC intake. He entered playgroups that same day without incident, is doing very well, and is working with a professional trainer.

Phoenix's records are even more striking. During his field pickup and loading, VCAS reports that he growled, showed his teeth, repeatedly bit and chewed the slip lead, and required a catch pole. Upon arrival at the shelter, VCAS documented growling, barking, baring teeth, repeated charging, violently biting the catch pole, refusing movement, and requiring a roll cage. VCAS then documented persistent barking, growling, hard staring, lunging, snapping, charging kennel barriers, baring teeth, and repeated attempts to bite throughout his shelter stay. The euthanasia notice and transfer waiver characterized Phoenix as exhibiting "severe aggression," stated that he could not be safely handled without tools, gave him a poor prognosis, and concluded that successful rehabilitation was unlikely. Dr. Lisa Kentfield's July 16 medical note separately described "severe FAS w/ aggressive behavior and high potential for fear-biting" during an examination that required extensive chemical restraint. VCAS nevertheless transferred Phoenix to SPARC under essentially the same kind of assessment, training, risk-assumption, and indemnification agreement it used for Thor.

In sum, VCAS has very recently trusted SPARC with large dogs whose documented field, intake, medical-handling, and shelter behavior was substantially more difficult than anything Bruce has displayed during nearly five months in VCAS custody.

VCAS allowed both dogs to leave the shelter for further assessment, training, rehabilitation, and management by SPARC after describing them as unhandleable, unplaceable, and eligible for euthanasia. Yet Bruce is being denied the opportunity for the same post-transfer professional assessment and rehabilitation that VCAS routinely permits for other euthanasia-listed dogs.

This despite the fact that Bruce has a substantially better in-custody record, with no documented bite, attempted bite, charge, lunge, snap, or aggressive handling incident. Here is a summary from VCAS records:

- On February 23, Bruce was easy to leash and walk to intake, permitted all handling and vaccinations without issue, and allowed staff to remove his leash and muzzle without issue.
- On March 4, VCAS called him “a model citizen in his kennel” and said he had shown no fear, anxiety, or stress.
- On March 5, VCAS again said that he had not shown signs of fear, anxiety, or stress that concerned the Animal Care team.
- From March 11 through April 15, VCAS repeatedly documented low FAS, quiet or resting behavior, no pacing, soft ears and lips, relaxation, treat-taking, tail wagging, and ordinary responses to staff.
- On March 22, a staff member sat near him and spoke gently, and Bruce did not react negatively.
- On March 28, Bruce lay on the floor and wagged his tail while staff spoke to and engaged him.
- On April 4, he approached the kennel gate with a wagging tail and lay down.
- On April 26, he was calm and lying down and then lay comfortably during a separate timed observation.
- On April 29, VCAS moved him from kennel 144 to kennel 122. No difficulty, resistance, handling concern, or behavioral incident was recorded.
- After the kennel transfer, routine behavior and FAS charting stopped. The later observations were principally prompted by medical concerns and continued to describe ordinary, non-aggressive behavior.
- On July 1, he was chewing a treat in his kennel.

- On July 5, he was resting against the outer kennel grate, got up, moved into the shade, and lay back down.
- On July 13, he was resting when the veterinarian approached within approximately six inches. He rose and walked briefly in response to kissing noises and then lay back down.
- On July 16, he moved between kennel compartments during the examination and gave a nervous yawn, but then lay calmly with his head on his paws. No growling, snapping, lunging, or attempted bite was recorded.
- On July 20, he rose, stretched, walked briefly toward the veterinarian, and then went inside and settled with his head resting on his paw.

VCAS closely monitored Bruce's behavior and stress for more than two months. Those observations remained materially consistent. After the apparently uneventful April 29 kennel transfer, routine behavioral charting stopped. VCAS has acknowledged it knows Bruce's supporters have been providing him snacks. We can independently verify through multiple videos that visitors have hand-fed those treats. Despite those repeated close and physically awkward interactions, the VCAS records contain no documented bite or attempted bite associated with the feeding—or any other documented in-custody bite, attempted bite, charge, lunge, snap, or aggressive handling incident. VCAS nevertheless says it will not leash, handle, or weigh Bruce because he has been “deemed vicious.” That appears to be a restriction based on the designation rather than on any new behavior Bruce has actually displayed in custody.

Oddly, Mr. Rodriguez remains fine with killing Bruce, despite his disparate treatment of other dogs, including Thor and Phoenix. Taxpayers may rightly evaluate—and based on public comments already are questioning—whether his compensation package of roughly \$283,009 (according to public records) is a waste of taxpayer money, as that term is defined under California law.

Please provide dates for the depositions of Mr. Rodriguez and Lisa Kentfield in the mid-August/September time frame.

One final note worthy of mention. *Michael Bradbury, Ventura County's former District Attorney and its longest-serving District Attorney—six terms and 24 years—has provided a written letter (attached) supporting a lifesaving resolution for Bruce. Mr. Bradbury's support matters for reasons beyond his*

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former office. He understands governmental decision-making, public safety, institutional liability, and the responsibilities of local officials. He and his wife, Heidi, have also rescued dogs for approximately 35 years and at times have cared for as many as thirteen dogs at their ranch. His letter expressly recognizes that Bruce's treatability and placement suitability have not been fully evaluated, relies on Dr. Crosby's expert opinion and VCAS's "model citizen" record, and urges the County to work with the rescue representatives and experts toward a qualified sanctuary or rescue transfer.

As I stated in my previous letters, and will state again, I am willing to sit down with whoever and whenever to seek a just, fair, reasonable and lifesaving alternative for Bruce, rather than killing him.

As Nathan Winograd recently noted in his coverage of this significant animal rights story: "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." Let's work together to give Bruce that opportunity.

Sincerely,

Walter Clark Legal Group

/s/ Dan C. Bolton

Dan C. Bolton