

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

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JAMELIA WASHINGTON,

Plaintiff,

v.

HUMANE RESCUE ALLIANCE,

Defendant.

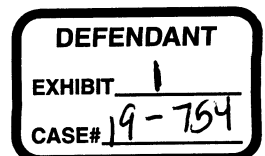
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No. 2019 CA 000754 B

DECLARATION OF CLAUDIA ROLL

I, **CLAUDIA ROLL**, declare as follows:

1. I am the Vice President of Operations for the Humane Rescue Alliance (“HRA”), located at 1201 New York Avenue NE, Washington, DC 20002. I respectfully submit this declaration in opposition to the Plaintiff’s motion for a temporary restraining order. I make this declaration from my personal knowledge.
2. I have worked in the field of animal welfare for 20 years. In 2012, I was hired to work at the Washington Humane Society, the predecessor to the HRA, as Director of Shelter Programs. I am now HRA’s Vice President of Operations.
3. In my current position, I am responsible for overseeing our staff as they carry out their duties fulfilling HRA’s mission and implementing HRA’s policies. I am frequently called on to interact with members of the public regarding animals in our care.
4. On January 21, 2019, HRA took in two stray dogs, Dino and Kleo. Dino and Kleo were found running at-large in Southeast D.C. Neither Dino nor Kleo had any identification or a microchip.



5. Later on January 21, 2019, Ms. Washington filed a lost animal report for Dino and Kleo. Utilizing the lost animal report and following D.C. law, an HRA worker called the telephone number for Ms. Washington and received no answer. The HRA employee left a message informing Ms. Washington that HRA had her two dogs in their care.

6. Later that same day, Ms. Washington contacted HRA and asked for the return of her dogs. The HRA employee confirmed that the dogs were available for Ms. Washington to recover and provided Ms. Washington with a quote of \$190 in fees for the dogs release.

7. Ms. Washington stated that she would try to come the following day, January 22, 2019, to reclaim the dogs. Ms. Washington informed the HRA employee that if she was not able to reclaim the dogs on January 22 that she would call.

8. Ms. Washington did not appear at HRA to reclaim the dogs on January 22.

9. On January 23, 2019, HRA called Ms. Washington. The call was sent directly to voicemail. The HRA employee left a message.

10. On January 24, 2019, HRA called a second phone number associated with Ms. Washington. The call was sent directly to voicemail. The HRA employee left a message. Later that day, Ms. Washington called HRA and requested an updated quote for fees.

11. On January 25, 2019, HRA called Ms. Washington again, but received no answer. The HRA employee left a message for Ms. Washington asking if she was still interested in reclaiming her dogs.

12. D.C. law states that a stray dog without identification becomes property of HRA five days after the dog enters HRA custody. On January 26, 2019, five days after Dino and Kleo were placed into HRA's custody, HRA attempted again to contact Ms. Washington and received no answer. The HRA employee left a message for Ms. Washington stating that by close of

business on January 26 was the last day of the stray hold for Dino and Kloe and Ms.

Washington's final opportunity to reclaim the dogs.

13. As of January 27, 2019, the stray hold for Dino and Kloe expired and the dogs were evaluated for their adoptability.

14. Per HRA policies, Dino was found to be not adoptable due to safety concerns. The safety concerns stemmed from a severe bite history involving an incident in September 2016 in which Dino bit a person at least three times, causing injury to the person's chest, leg, and hand.

15. D.C. law requires HRA to dispose of animals that are HRA property and cannot be adopted. The decision to euthanize an animal is not taken lightly and must be approved by two management level staff.

16. Due to resource constraints at HRA, euthanizations are carried out as soon as practicable following a determination that an animal must be euthanized. Dino was euthanized on January 27, 2019.

17. Per HRA policies, Kloe was found to be adoptable. On January 27, 2019, Kloe was placed on HRA's website as available for adoption, pending spaying.

18. On the evening of January 29, 2019, Ms. Washington called HRA and stated she was on her way to reclaim Dino. Ms. Washington did not mention Kloe.

19. The HRA supervisor on duty informed Ms. Washington that Dino had been euthanized due to the expiration of the stray hold and Dino's bite history.

20. Ms. Washington became very upset, stating that she was coming and HRA better have her dog. The HRA supervisor heard Ms. Washington tell a companion to get out of the car and that she was going "fucking kill someone because they killed my – fucking killed my dog."

21. Ms. Washington stated that “She ain’t fucking playing she is going to kill whoever she sees for fucking killing her dog.”

22. Ms. Washington stated that HRA had better not have killed her dog and then abruptly hung up.

23. The HRA supervisor came to me immediately after the conclusion of this call. It was apparent to me that the call had shaken and upset the employee. The supervisor recorded the details of the call in records associated with Dino and Kloe.

24. I directed that a barring notice be prepared for service on Ms. Washington should she appear at HRA.

25. On January 30, 2019, Ms. Washington arrived at HRA. I immediately called the Metropolitan Police Department (“MPD”) and requested they respond to our New York Avenue location as witnesses and for support in service of the barring notice.

26. Ms. Washington was asked to wait to speak to a supervisor. HRA staff made efforts to keep her calm. She was at times calm and at other times agitated.

27. Ms. Washington repeatedly left the building to return to her vehicle and then came back. Ms. Washington also walked toward the adoptions building.

28. On the final time Ms. Washington left the main building, she did so in anger, bursting through the front door with such force that the door loudly banged against the building.

29. I judged at this time that HRA staff and the public were at increased risk. I instructed HRA staff members to lock the door and the side gate that leads into our facility.

30. When Ms. Washington returned to the front door and discovered it locked, she proceeded to violently and repeatedly kick the front door and to push at windows. Through the view provided by our security cameras, Ms. Washington then went to the side gate and violently

and repeatedly pulled on and shook the chain and padlock to the locked gate. The video indicates that Ms. Washington attempted to scale the chain link fence surrounding our facility, but failed to climb over it.


31. Ms. Washington proceeded to yell outside of the HRA building for the next five to 10 minutes. Police officers arrived 20 minutes after my first call. In that time, as Ms. Washington's anger grew, I called MPD four additional times, urging them to hurry to our location.

32. The officers proceeded to seek Ms. Washington's signature on the barring notice, which she refused to provide. Officers nonetheless served Ms. Washington with a copy of the barring notice.

33. In my 20 years working in animal welfare and in 7 years at the Washington Humane Society and HRA, I have never been in a situation that felt more dangerous and made me more afraid for the safety of myself, my staff, and our patrons. HRA employees regularly encounter distressed and volatile members of the public, many of whom are dealing with extraordinary stress at the same time they are interacting with HRA. Screaming and yelling are common at the HRA. Our staff is trained to help patrons manage their difficult emotions. Ms. Washington's behavior over the phone and at our facility went far beyond anything I or my staff is prepared to manage or tolerate.

34. The HRA does not issue barring notices regularly or lightly. To my knowledge, Ms. Washington's case is the first time the HRA has ever issued a barring notice to someone who was not under criminal investigation for violence toward animals or people.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Washington, DC on February 15, 2019.



CLAUDIA ROLL