

THE STATE OF TEXAS

AFFIDAVIT
FOR ANIMAL CRUELTY
HEARING

COUNTY OF TARRANT

I, Mike Bass, the undersigned affiant, of Tarrant County, Texas being an Animal Control Officer under the laws of the State of Texas and being duly sworn, on oath, makes the following statements of accusations for legal seizure under Section 821.022 of the Health and Safety Code:

Seizure is requested of ALL ANIMALS, ALIVE, DEAD, AND UNBORN,

Specifically including but not limited to:

Reptiles; Arachnids; Mammals; Amphibians; Crustaceans

These animal(s) are currently located at:

I do solemnly swear that there is situated in the County and State aforesaid a certain parcel under the control of Jasen and Vanessa Shaw, located at US Global Exotics, Inc., 1007 Oakmead Dr, in Texas Arlington, Texas. The description of the premises is as follows: A one story tan colored commercial building located on the south side of Oakmead Dr., facing north.


My belief of the foregoing is based on the following facts:

- (1) On 12/9/09, I Animal Services Officer Mike Bass, ID 9581, responded to the above stated address at the request of US Fish and Wildlife Special Agent Richard Cook. Agent Cook stated a federal search and seizure warrant had been executed at the above stated address pursuant to the Lacey Act, Title 16 USC 3372 (d). Agent Cook requested that I, on behalf of Arlington Animal Services, investigate whether or not animals at the location are being cruelly treated.
- (2) On 12/9/09, I interviewed a confidential informant (CI), working in an undercover capacity for the organization People for the Ethical Treatment of Animals (PETA). The CI stated he infiltrated US Global Exotics, Inc. an animal dealer involved in the import and export of exotic live animals, by accepting employment as a Veterinary Technician approximately seven (7) months ago. The CI indicated he has over 15 years of experience as a Certified Veterinary Technician.
- (3) On 12/14/09, I met and interviewed the CI who provided me documentation, information, pictures, and videos related to his observations of animal cruelty occurring throughout his work shift on this day. Specifically he stated the following:
 - The CI, during the course of assigned duties, completes a deceased animal log. He stated he documented the deaths of 67 reptiles from 12/7/09 – 12/11/09. He stated the deaths were of various reasons related to illnesses, cruel confinement, and a lack of food (Exhibit A)
 - The CI observed approximately 5,000 live aquatic turtles being cruelly confined to individual cardboard boxes, for a period of time ranging from 11/27/09 – 12/10/09 without food or water (Exhibit B)
 - The CI removed 10 deceased ball pythons from holding troughs who had died as a result of being crushed by the weight of other pythons and disease as a result of overcrowded conditions and inadequate veterinary care (Exhibit C & D)

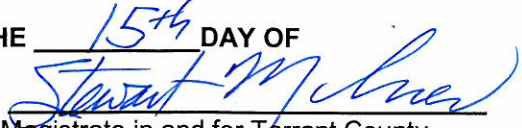
- The CI observed deceased hamsters cannibalized due to a lack of food and living in overcrowded conditions (Exhibit E)
- The CI observed an injured hedge hog that had been separated from other hedge hogs on 12/10/09 deceased on 12/14/09 without receiving veterinary care (Exhibit F)
- The CI observed the deceased mammal log that documented the deaths of 85 mammals from 12/7/09 – 12/11/09 (Exhibit G)
- The CI observed approximately ten (10) 2 liter bottles, filled with approximately 50 live frogs per bottle, without food or water (Exhibit H)
- The CI observed two (2) coatimundi housed in unsanitary conditions (Exhibit I)
- The CI observed unsanitary conditions and unclean water in a kinkajou cage (Exhibit J)
- The CI observed an unknown number of live and dead iguanas packed in crates, three per bag, since 12/2/09, without food or water (Exhibit K & L)
- The CI observed a prairie dog cannibalized due to a lack of food and living in overcrowded conditions (Exhibit M)
- The CI observed approximately 17 cannibalized hamsters due to a lack of food and living in overcrowded conditions (Exhibit N)
- The CI observed an emaciated and deceased reverse oakatee corn snake (Exhibit O)
- The CI, during the course of assigned duties, completes a deceased animal log. He stated he documented the deaths of 85 reptiles 12/14/09. He stated the deaths were of various reasons related to illnesses, cruel confinement, and a lack of food (Exhibit P)
- The CI observed a deceased animal log which documented the deaths of 218 yellow belly turtles on 12/14/09 (Exhibit Q)
- The CI observed a variety of deceased animals discarded in dumpster (Exhibits R & S)

Wherefore, the Affiant requests a warrant to seize said animals in accordance with Section 821.022 of the Texas Health and Safety Code in order to determine if said animals have been unreasonably deprived of necessary food, care, shelter, or cruelly confined.

Wherefore, the Affiant requests the humane euthanasia of all seized animals, as deemed necessary by a licensed veterinarian, in order to prevent suffering.

WITNESS, my signature this 15th day of December, 2009


 Mike Bass
 AFFIANT
 Assistant Director of Community Services
 TITLE

SUBSCRIBED AND SWORN TO BEFORE ME THIS THE 15th DAY OF
DECEMBER, 2009


 Magistrate in and for Tarrant County
 CHIEF JUDGE, CITY OF ARLINGTON
 Title and Office Held by Magistrate

