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# Florida State Department of Education

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PETITION FOR AGENCY ACTION  
TO FULLY COMPLY WITH THE MANDATES OF THE  
FLORIDA K-12 EDUCATIONAL STATUTES

*SUBMITTED TO:*

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## **NATURE OF PETITION TO INITIATE RULEMAKING**

This petition for agency action under FS 120.54(7)(a), FS 120.54(14), FS 1.01(3) addresses the failure of the Commissioner of the Department of Education (Commissioner) to fully implement the mandates of FS 1006.31(4)(c), FS 1003.42(2)(k), and FS 1003.47, specifically, the humane education, kindness to animals, and anti-vivisection/biological experimentation components of the Florida K-12 educational system. This Petition also seeks appropriate remedial instruction or discipline of former Hawthorne High School Principal Robert Craig and FFA teacher Allen Shaw.

Under the Act, the legislature has charged the Department of Education and its instructional materials committee with this duty:

**1006.31 Duties of each state instructional materials committee.**--The duties of each state instructional materials committee are:

(4) EVALUATION OF INSTRUCTIONAL MATERIALS.--To evaluate carefully all instructional materials submitted, to ascertain which instructional materials, if any, submitted for consideration best implement the selection criteria developed by the commissioner and those curricular objectives included within applicable performance standards provided for in s. [1001.03](#)(1).

(c) **When recommending instructional materials for use in the schools, each committee shall require** such materials as it deems necessary and proper to encourage thrift, fire prevention, and **humane treatment of people and animals**.

FS 1006.31(4)(c) (emphasis added).

Also applicable are FS 1003.42(2)(k) and FS 1001.01(2), stating:

**1003.42 Required instruction.**--

(1) Each district school board shall provide all courses required for middle grades promotion, high school graduation, and appropriate instruction designed to ensure that students meet State Board of Education adopted standards in the following subject areas: reading and other language arts, mathematics, science, social studies, foreign languages, health and physical education, and the arts.

(2) Members of the instructional staff of the public schools, subject to the rules of the State Board of Education and the district school board, shall teach

efficiently and faithfully, using the books and materials required that meet the highest standards for professionalism and historic accuracy, following the prescribed courses of study, and employing approved methods of instruction, the following:

(k) **Kindness to animals.**

**1000.01 The Florida K-20 education system; technical provisions.**

(1) NAME. Chapters 1000 through 1013 shall be known and cited as the “Florida K-20 Education Code.”

(2) LIBERAL CONSTRUCTION. The provisions of the Florida K-20 Education Code **shall be liberally construed to the end that its objectives may be effected.** It is the legislative intent that if any section, subsection, sentence, clause, or provision of the Florida K-20 Education Code is held invalid, the remainder of the code shall not be affected.

No rules have been enacted to administer FS 1006.31(4)(c). Accordingly, this document also serves as a petition to create new rules addressing important humane educational practices in schools through the State of Florida.

While the Science Specifications 2009, at 243-44, provide passing acknowledgement of humane principles, evidently amiss are those rules that would otherwise have prevented the disrespectful handling of birds and animal cruelty inflicted at the hands of Hawthorne High School students enrolled in Mr. Allen Shaw’s FFA class through its “Broiler Project,” the catalyst for this petition. The specifications state:

**H. HUMANITY AND COMPASSION**

**Portrayal of the appropriate care and treatment of people and animals must include compassion, sympathy, and consideration of their needs and values and exclude hard-core pornography and inhumane treatment.**

**See Florida Statutes 1003.42; 1006.31(4)(c); 1006.34(2)(b).**

**Inclusion of compassion.** When providing examples in narrative or visuals, materials sometimes depict the care and treatment of people and animals. Generally, this means showing in some way a measure of compassion, sympathy, or consideration of their needs and feelings.

**Exclusion of inhumanity.** In the context of personal and family values, Florida expressly prohibits material containing *hard-core pornography*. In addition, although the definition of *inhumane treatment* can sometimes appear to be controversial, as in science research, there is general agreement that instructional materials should not advocate any form of inhumane treatment.

As with the evaluation of multicultural representation, it is important to consider the context of the subject and the age and abilities of the students.

See 243-44 (Science Specs 2009).

Media extensively covered the filing of felony animal cruelty charges by Assistant State Attorney Geoffrey C. Fleck against Hawthorne High School students Patrick Ruebin Dougan and Robert Sylvester Gordon, Jr. on May 29, 2009. Though dismissed by *nolle prosequi* on Dec. 7, 2009 due to ostensible lack of evidence, that Mr. Dougan and Mr. Gordon will not face criminal charges does not obviate critical consideration of the issues motivating this petition. ***Exh. A (Amended Information and Nolle Prosequi)***. For if the State Attorney found the sufficiently atrocious misconduct to constitute adequate grounds to pursue felony charges against eighteen-year-olds in the brutal killing of a chicken, though bound by the most onerous burden of proof, that action alone commends serious, independent examination by the Commissioner. ***Exh. B (Activity Card and State Attorney's Summary of Incident)***. By contrast, the petitioners do not ask the Department to expel or punish Mr. Dougan and Mr. Gordon. Instead, they implore it to follow statutory mandates to ensure that no situation as occurred at Hawthorne High School ever recurs.

The incident video reviewed by Mr. Fleck, Alachua County Animal Control, and Dr. Duncan (letter submitted herein) is found on CD accompanying this petition in various formats. Reviewers may also access the video by clicking on the hyperlinked image below or by directing an internet browser to [www.upc-online.org/hawthorne/](http://www.upc-online.org/hawthorne/) :



The Activity Card completed by Officer J. Ritchie reveals the following important details:

I spoke to the Principal Craig and he was unaware of the video or that there were any animals located on school grounds. ... We spoke to Allen Shaw the teacher of the FFA program about the incident. Mr. Shaw did say that they were teaching the kids how to properly kill and prepare chicken they had raised. I explained about the video to Mr. Shaw and he was unaware that the incident had happened. ... Mr. Shaw explained that he has 40 students in that class and that he helped each student kill their chicken and prepare it. Mr. Shaw stated that he must have been busy helping another student when the incident occurred. Mr. Shaw clearly stated that the way the chicken was killed was not an approved method taught in this class.

***Exh. B, Activity Card.*** Ritchey and investigator Lin Santerfeit add:

Myself and Investigator Santerfeit then went and spoke to Mr. Allen Shaw who was the teacher of the FFA class. While we waited for class to get out we noticed that the location of the video was directly outside of the rear classroom door. The Livestock Pavilion was at the same angle as the video.

***Exh. B, Sworn Statement, 09-2724.*** In an email to Mr. Fleck, Ofc. Ritchey states:

The school never knew about it till we told them. In fact the principal at the school, even after he saw the video, said that there were no animals housed on school grounds. Yet we walked out back of the school and found a large chicken house that had two chickens living in it.

***Exh. B, Ritchey to Fleck email of Jul. 17, 2009.***

Mr. Shaw's Broiler Project describes the purported "humane processing" of the grown chicks, from restraint through dislocation and butchering. *Exh. C (Project Description, care of Alachua County Prosecuting Attorney's Office, public records request of Karen Davis)*. Though Mr. Shaw's students supposedly received written instructional materials governed by the State Instructional Materials Committee ("SIMC") and FS 1006.31, state law concerning biological experiments on living subjects also applies, per FS 1003.47, which states in relevant part:

**Biological experiments on living subjects.**

(1) It is the intent of the Legislature with respect to biological experiments involving living subjects by students in grades K through 12 that:

**(a) No surgery or dissection shall be performed on any living mammalian vertebrate or bird.** Dissection may be performed on nonliving mammals or birds secured from a recognized source of such specimens and under supervision of qualified instructors. Students may be excused upon written request of a parent.

...

(c) Nonmammalian vertebrates, **excluding birds**, may be used in biological experiments, provided that physiological harm does not result from such experiments. Anatomical studies shall only be conducted on models that are anatomically correct for the animal being studied or on nonliving nonmammalian vertebrates secured and from a recognized source of such specimens and under the supervision of qualified instructors. Students may be excused from such experiments upon written request of the parent.

...

**(g) All experiments shall be carried out under the supervision of a competent science teacher who shall be responsible for ensuring that the student has the necessary comprehension for the study to be undertaken. Whenever feasible, specifically qualified experts in the field should be consulted.**

**(h) Live animals on the premises of public and private elementary, middle, and high schools shall be housed and cared for in a humane and safe manner. Animals shall not remain on the premises of any school during periods when such school is not in session, unless adequate care is provided for such animals.**

(2) The provisions of this section shall not be construed to prohibit or constrain **conventional instruction in the normal practices of animal husbandry** or exhibition of any livestock in connection with any agricultural program or instruction of advanced students participating in advanced research, scientific studies, or projects.

(3) **If any instructional employee of a public high school or career center knowingly or intentionally fails or refuses to comply with any of the provisions of this section, the district school board may suspend, dismiss, return to annual contract, or otherwise discipline such employee as provided in s. 1012.22(1)(f) in accordance with procedures established in chapter 1012.** If any instructional employee of any private school knowingly or intentionally fails or refuses to comply with the provisions of this section, the governing authority of the private school may suspend, dismiss, or otherwise discipline such employee in accordance with its standard personnel procedures.

Deposed as part of the criminal prosecution were two Hawthorne High School students, Samantha Faircloth and Rodney Tillman. *Exh. D (Faircloth Dep.); Exh. E (Tillman Dep.)*. Ms. Faircloth describes Mr. Shaw's humane "method" as follows:

Q. Okay. Did you recall your teacher, Mr. Shaw, demonstrating, before the class started, how to properly kill a chicken?

A. Yeah.

Q. How was that?

A. He just like grabbed his head and his feet and just popped the head out of place and then threw it in the bucket **until it died.**

*Faircloth Dep., at 10:9-16* (emphasis added, confirming that Mr. Shaw did not ensure prompt euthanasia). She adds, on cross-examination:

Q. When the kids were throwing the chicken in the bucket, were the chickens alive?

A. They were like yeah; but they were like I guess the nerves, like they were like

Q. They were flopping around; right?

A. Yeah.

Q. Even when Mr. Shaw popped the chicken's neck and threw him in the bucket, the chicken was flopping around?

A. Yeah.

***Id.*, at 12:5-14.** On this point, note Dr. Duncan’s commentary that suffering cannot be ascertained by viewing the body; instead, scrutinizing the head matters fundamentally. Student Rodney Tillman comments on the class as well:

Q. Can you please tell me what you saw?

...

A. It was a project in ag class, and everybody was popping chickens’ necks. It was a class grade. And it just got a little out of hand, and people started pulling heads off completely.

***Tillman Dep.*, at 4:9-17.** Noting that the decapitation by Mr. Gordon was not exclusive to him, Mr. Tillman adds:

A. Mr. Shaw instructed us how to do it, and we just took it too far by, you know, pulling the heads off way too hard.

Q. Okay. Where was Mr. Shaw when all these heads were popping off? Was he in a place where he couldn’t see this?

A. I think his back was turned.

***Id.*, at 10:1-7.** Though Mr. Shaw will self-servingly claim that he never would have authorized decapitation had he seen the students using excessive force, undisputedly Mr. Shaw never saw Mr. Gordon and Mr. Dougan kill one chicken by throwing her into the ground, much less attempt dislocation because his “back was turned.” Indeed, with forty students and over twenty chickens to be killed in a fifty-minute class, complete with Mr. Shaw instructing on how to clean and dress the chickens after killing, moving inside and outside the building (see ***Tillman Dep.*, 14:2-7**), with many students (see Mr. Tillman’s reference to “we”) taking it “too far,” Mr. Shaw clearly did not have sufficient time or control over the class room, creating an environment posing a significant risk of animal cruelty.

Two world-renowned experts asked to watch the Robert Gordon and Patrick Dougan video, Dr. Nedim C. Buyukmihci, Emeritus Professor of Veterinary Medicine at University of California at



Davis, and Dr. Ian J.H. Duncan, Professor Emeritus in Animal Welfare at the University of Guelph's Ontario Agriculture College Department of Animal and Poultry Science, offered comments signifying precisely why Mr. Shaw's Broiler Project violates FS 1006.41 (SIMC humane education protocol), 1003.42 (kindness to animals component), and 1003.47 (biological experiments).

Dr. Duncan states, in relevant part:

I have watched the video entitled "Chicken Bashing at Hawthorne High School" several times. In my opinion, the actions shown depict gross cruelty. This opinion seems to be shared by at least one of the children observing the actions since I could hear the words "...terrible cruelty..." in the background.

...

I am shocked that school children would be given access to live animals without any apparent supervision. In my opinion the teacher "in charge" should be held at least partly responsible for this act of cruelty.

...

The usual way for farmers to kill chickens is to dislocate the neck. It is quite a skilled technique to do this properly, and I really do not think that school children should be attempting this procedure. ... [Cervical dislocation] has always been thought [] humane i.e. that a bird so treated lost consciousness and died within a few seconds.

However, recent research completed at Guelph suggests that this is not the case. ... We are now advising all farmers (turkey and chicken) to use this non-penetrating captive bolt pistol instead of manual dislocation of the neck.

...

However, I have no idea how skilled the pupils were at dislocating necks. If necks are dislocated at a lower level than the Atlas and Axis, consciousness will last longer. ... It is the head that is experiencing the suffering and it is the head that must be very closely observed. Our student here in Guelph relied heavily on certain reflexes including the papillary response to light and the blinking of the nictitating membrane (the third eyelid in birds) in response to stimulation, to judge whether or not the birds were conscious and when death occurred.

***Exh. F (Duncan Aug. 18, 2010 Letter to Karp).***

In light of Dr. Duncan's comments, there is no evidence that Mr. Shaw taught his students death verification techniques in order to assess the relative success in "humanely" killing the chickens each student learned to raise from one-day-old chicks. In this respect, Dr. Buykmihei offers

highly probative observations on the effectiveness of the technique, even in skilled hands, which urbanized teenagers assuredly did not possess:

Although cervical dislocation *may* (this is an important qualification) be an effective method of killing chickens, it has to be applied properly. *Nevertheless, there are no scientific studies to confirm that this method is truly humane.* In fact, loss of consciousness may not be instantaneous and electrical activity in the brain may persist for many seconds suggesting that the individual can continue to feel pain and suffer during this time.<sup>1,2,4,5,6</sup> Even if decapitation occurs, this does not result in instantaneous death and suffering can continue for some seconds.<sup>2,3,4,5,6</sup> It is reasonable to conclude, therefore, that movement on the part of the animals subjected to these procedures is not simply reflexive and indicates suffering for at least some time after the procedure.

Because the students were being taught the technique of cervical dislocation, it should be obvious that no student likely had the skills to “properly” do this procedure. In cases such as this, professionals such as myself and my colleagues’ recommend that the birds first be anesthetized. This must be done through acceptable veterinary methods. In the event of incorrect application, this would allow the instructor the opportunity to then kill the individual immediately so that suffering will not occur.

***Exh. G (Buyukmichi Jun. 17, 2010 Letter to Davis).*** The last sentence is critical in that Mr. Shaw was nowhere to be found when Robert Gordon slammed the chicken into the ground after allegedly dislocating the neck. How many other chickens suffered at the hands of thirty-nine other high schoolers during Mr. Shaw’s period of distraction? Supervision of the killing procedure was woefully inadequate. ***See Exh. B (Supplemental Investigative Narrative, page 1 of 2) (40 students).***

The “Broiler Project” violates FS 1003.47(1)(a) in that the forcible restraint and attempted dislocation of the neck constitutes a form of vivisection. “Dissection,” or anatomization, is defined as the process of disassembling and observing, cutting apart, or separating tissues. That some students ripped off the heads of chickens clearly fits within the ambit of prohibited dissection. Even the act of dislocation, when “properly” performed by very skilled farmers,<sup>1</sup> constitutes dissection in

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<sup>1</sup> See, however, the Aug. 18, 2010 letter of Dr. Duncan and Jun. 17, 2010 letter of Dr. Buyukmihci, calling into doubt the humanity and effectiveness of cervical dislocation of birds.

that it, colloquially speaking, results in “breaking the neck” or “snapping the spine.” In separating the spinal cord from the brain, death purportedly ensues rapidly. When performed on nonliving animals, this constitutes dissection (and is prohibited by FS 1003.47(1)(a)). Reason dictates that the prohibition continues when attempted on living animals, except that it is called vivisection.

FS 1003.47(2) does not alter this analysis. First, Mr. Shaw’s course was not part of an agricultural program or instruction of “advanced” students participating in “advanced” research, scientific studies, or projects. These were average high schoolers taking an entry-level course. Nor would slaughtering birds in high school constitute “conventional” instruction, given that the technique is one utilized by adult, experienced farmers, not children, and certainly not “in connection with” advanced students participating in advanced research. Lastly, in light of Dr. Duncan’s reference to recent research, cervical dislocation has proved to be an inhumane method; instead, nonpenetrating captive bolt or controlled atmospheric euthanasia methods have become the norm.

### **JURISDICTION**

This petition is filed pursuant to Ch. 120.54 FS and submitted to the Commissioner of the Department of Education, or his designee, as the person responsible for complying with the mandates of the Act.

### **PETITIONER**

The petitioners, Floridian Susan Hargreaves and her organization Humane Educators Reaching Out (“HERO”), as well as Executive Director Karen Davis and her organization United Poultry Concerns, Inc. (“UPC”), a nonprofit organization incorporated under the laws of Maryland,

qualify as proper parties under the FAPA. Statements of interest from Hargreaves, HERO, and UPC follow:

**Statement of Substantial Interest (Hargreaves and HERO):**

HERO is a Florida-based non-profit organization who partners with the Fund for Abused Animals to prevent animal abuse and neglect by educating others about the impact their choices have on other animals and each other. HERO Founder Susan Hargreaves has been working in humane education for thirty years. Susan immigrated into the United States as a person of “Extraordinary Ability” in the field of humane education, a category requiring legal proof of practiced expertise, ability and renown in the top five percent of her field. Currently, Susan is also Director of Education at Caring Fields Animal Sanctuary in Palm City, Florida, a 26-acre sanctuary for abandoned, abused or neglected cats and horses. Susan has created a humane education center that offers on-site and off-site programs aligned with state standards promoting the humane treatment of all species of animals. Susan has worked with the Palm Beach County Safe Schools Department, Safe Schools Broward, School Parent Teachers Associations in Miami-Dade County and Broward County, Healthy Families Broward, Women in Distress, Aid to Victims of Domestic Violence, Children’s Home Services and Broward County’s School Board Guidance Counselor Lead Administrator, Nina Hansen, on special projects geared to reduce violence in Florida’s schools. HERO’s humane education programs span across the State of Florida and reach 17,000 children and youth annually. A constant component of each presentation, special project or program tackles insensitivity towards other animals, which can lead to animal abuse and neglect, bullying and violent acts. HERO and Susan Hargreaves have both a professional and personal vested interest in changing the culture of apathy and bullying that currently runs rampant in schools and evidenced by recent headlines. Acts

of cruelty committed like the Hawthorne case completely contradict the work of humane educators and violence prevention specialists like Susan Hargreaves, Florida humane educators who are spending their resources, time, and skill on promoting the humane treatment of all beings including the rights of Florida's students to attend school free of the fear of being bullied.

Examples of HERO contributions to humane education and actions to prevent animal cruelty, bullying and violence using public recognition of positive, kind acts by school children include: (1) Media has extensively featured the Animal Hero Awards program, designed to publicly acclaim youth who have made ethical decisions that help others in spite of contrary peer or societal pressures; (2) Susan Hargreaves addressed a group of seventy teachers on June 28, 2010 at the Bridge to Prevention workshop for Broward County School teachers in response to an increase in violent acts perpetrated on students by other students. (3) HERO presented a day of presentations at Deerfield Beach Middle School in Broward County after thirteen-year-olds doused another thirteen-year-old, Deerfield Beach Middle School student with gasoline and set the student on fire. This is the same school where a neighboring high school student set upon a student and beat badly enough to put her in a coma, suffered severe brain damage, and is now re-learning basic skills.

- Please see the attached *Sun Sentinel* article about Sydale Clark, an Oriole Elementary 5th Grade student who attended an assembly program at his school presented by Susan Hargreaves. Sydale received an Animal Hero card (attached), which contains a pledge about helping all animals at the assembly. One week later Sydale rescued an injured Mourning Dove, in spite of his friends telling him not to bother. "If I don't help this bird, who will?" Sydale said.
- See attached Dec. 18, 2008 *Miami Herald* newspaper article, Kind Kids Honored where Allapattah Middle School students and a Lenore B. Smith Elementary student rescued an eight-month-old puppy, beaten and stuffed down a sewer grate in their Liberty City neighborhood. The dog had her leg amputated due to injuries. Susan Hargreaves gave each student Extraordinary Animal Hero Awards at their respective schools, covered extensively in the news.

- See the attached Sept. 29, 2010 *TCPalm* article *Stuart grade-school students urged to become 'animal heroes'*, highlighting one of the presentations to promote empathy and humane choices regarding others.
- See the Sept. 29, 2010 *Jupiter Courier* article *Important Lessons in Kindness*, quoting Susan Hargreaves, "My mission is to foster compassion for all animals, from domestic to wildlife to farm animals and those that are used for entertainment."
- See the attached Jan. 2, 2011 *Jupiter Courier* article *Ricky Williams honors Animal Hero Kids*, featuring football player Ricky Williams and Susan Hargreaves.

Karen Davis alerted Susan Hargreaves to the Hawthorne High School animal cruelty case, sharing public records obtained by UPC, including depositions by students Rodney Tillman and Samantha Faircloth, who were present in Allen Shaw's classroom on April 15, 2009 when chickens were being slaughtered (i.e., being decapitated and subjected to cervical dislocation, referred to by the students as "popping" the chickens' necks). This student testimony indicates that Allen Shaw's classroom was in a condition of chaos, animal cruelty and mayhem, including students ripping off the heads of live chickens. Teacher-sanctioned animal cruelty resulting in the suffering and violent death of hens at the hands of students is a horrific example of what is wrong with a Florida School Board that allows curriculum to encompass the killing of animals. How can we counteract bullying in the schools while encouraging the victimization of those species who cannot defend themselves? To learn more about Susan Hargreaves and HERO, go to [www.humaneeducatorsreachingout.com](http://www.humaneeducatorsreachingout.com).

### **Statement of Substantial Interest (UPC):**

#### **United Poultry Concerns: Origin and Mission**

United Poultry Concerns is a (501)(c)(3) nonprofit organization that addresses the treatment of domestic fowl in food production, science, education, entertainment, and human companionship situations. Incorporated in Maryland in 1990, and headquartered in Virginia where the organization maintains a sanctuary for abused and neglected chickens and ducks, United Poultry Concerns is an

Animal Charities of America member of the Combined Federal Campaign which requires an annual demonstration of services rendered in at least fifteen U.S. states. United Poultry Concerns has members in all fifty states including Florida.

The mission of United Poultry Concerns (UPC) is to promote the compassionate and respectful treatment of domestic fowl. UPC does this through its quarterly magazine *Poultry Press*, its Web site at [www.UPC-online.org](http://www.UPC-online.org), its sanctuary for chickens in Virginia, and its educational programs and publications, including exhibits, literature and lectures presented at state and national science teachers' conferences. United Poultry Concerns seeks to make the public aware of how domestic fowl (poultry) are treated by society and to show how society's treatment of these birds affects human health, ethics, education, occupational safety, and the environment. UPC promotes humane alternatives to procedures that cause or would be likely to cause unnecessary suffering and harm to chickens and other domestic fowl.

Education is a primary focus of United Poultry Concerns. UPC promotes humane education at all grade levels, K-12 and above, including opportunities for students and teachers to visit UPC's chicken sanctuary on the Eastern Shore of Virginia. United Poultry Concerns' President and Founder, Karen Davis, has a PhD in English from the University of Maryland, College Park, where she taught for twelve years in the English Department, and before that, she worked as a Juvenile Probation Officer-Aftercare Counselor in the Department of Juvenile Services in Baltimore Maryland for five years. Dr. Davis has an extensive background with children and teenagers as a classroom teacher, family counselor and law enforcement officer in addition to her work on behalf of abused animals and domestic fowl. Consequently, she has expert knowledge of and a substantial interest in humane education as it affects both students and animals.

### **United Poultry Concerns and the State of Florida v. Robert Gordon and Patrick Dougan**

On July 14, 2009, United Poultry Concerns President Karen Davis was contacted by Geoffrey C. Fleck, Assistant State Attorney in the Eighth Judicial Circuit of Florida, regarding an animal cruelty case arising from a video clip that had been posted on the Internet showing a live chicken being bashed on the ground by Robert Gordon, a student at Hawthorne High School in Alachua County, Florida, in association with a classmate, Patrick Dougan, who said, "Tear it apart," then said, "if you want to see more of that, come out to Hawthorne High School." The video, shot by another student, Samantha Faircloth, took place while the students were participating in a chicken slaughtering class conducted by a Future Farmers of America teacher, Allen Shaw, at Hawthorne High School on April 15, 2009.

Attorney Geoffrey Fleck explained to UPC President Karen Davis that his office was prosecuting Patrick Dougan and Robert Gordon for felony animal cruelty under section 828.27(1)(d) in which Cruelty is defined as "any act of neglect, torture, or torment that causes unjustifiable pain or suffering of an animal." Mr. Fleck explained that he wanted to qualify Ms. Davis as an expert to provide an informed opinion, based upon reasonable certainty, whether chickens feel pain and have intelligence. This would entail both behavioral evidence and explaining biologically that a chicken being smashed on the ground and suffering a broken neck would feel pain.

Responding to Mr. Fleck's request, Ms. Davis provided him with a summary of scientific information on the mental complexity of chickens including their capacity for pain and suffering and agreed to testify for the state at trial in the case of State of Florida v. Robert Gordon and Patrick Dougan. Subsequently, Mr. Fleck informed Ms. Davis that he reluctantly dropped the charges



against Patrick Dougan and Robert Gordon due to conflicting accounts of the episode depicted in the video clip.

On April 22, 2010, United Poultry Concerns filed a Public Records Request for all records, documents and related material, in the matter of *State of Florida v. Robert Gordon and Patrick Dougan*, from the Florida State Attorney's Office under the Florida Public Records Act, Chapter 119, section 1 of the Florida Statutes; and on April 23, 2010, United Poultry Concerns filed a Public Records Request for all records, documents and related material in the matter of *State of Florida v. Robert Gordon and Patrick Dougan*, from the Alachua County Department of Animal Services. The requested Public Records were made available to United Poultry Concerns in a package dated May 10, 2010 from the Office of the State Attorney, Eighth Judicial Circuit, 120 West University Avenue, Gainesville, Florida 32601.

The Public Records documents obtained by United Poultry Concerns include depositions by students Rodney Tillman and Samantha Faircloth who were present in Allen Shaw's classroom on April 15, 2009 when the chickens were being slaughtered (i.e., being decapitated and subjected to cervical dislocation, referred to by the students as "popping" the chickens' necks). This student testimony indicates that Allen Shaw's classroom was in a condition of chaos, animal cruelty and mayhem, including students ripping off the heads of live chickens, during which time Rodney Tillman said of Mr. Shaw, under direct examination by Mr. Fleck, "I think he [Allen Shaw] had his back turned."

The Public Record includes a summary dated May 5, 2009, by investigating officers with the Alachua County Department of Animal Services, in which Robert Craig, Principal of Hawthorne

High School, reportedly “stated he knew nothing” about the videotaped chicken bashing episode on school property, and “in fact he did not believe that they had any animals housed on campus.”

**Examples of United Poultry Concerns’ contributions to humane education and actions against cruelty to domestic fowl in educational settings:**

- Virginia Association of Science Teachers. United Poultry Concerns does annual presentations at the Virginia Association of Science Teachers conferences on “Appreciating Birds” including avian embryology, bird habits, families and natural behavior, and Humane Alternatives to Classroom Chick Hatching Projects. [www.upc-online.org/hatching/](http://www.upc-online.org/hatching/).
- The Community School. 2009. United Poultry Concerns publicized and sought to prevent repeat performances of the “Chicken Project” at The Community School (a private K-12 school) in Sun Valley, Idaho, in which eighth-grade students slaughtered sixteen chickens they had raised for six weeks at the school on November 2, 2009 as part of a “Food Unit” course. To date, the heavily criticized “Chicken Project” has not been repeated at The Community School.
- Canandaigua Academy. 2008-2009. Following a year-long campaign to eliminate a chicken-slaughter project at Canandaigua Academy in Canandaigua, NY, United Poultry Concerns with the assistance of legal counsel for the Humane Society of New York prompted the New York State Department of Education to enforce NYS Education Law, Section 809 - Humane Treatment of Live Vertebrate Animals, which prohibits studies that employ “termination of life” procedures. The Department of Education suspended the “chicken slaughter project” for the school district’s failure to apply for a waiver as required by law, then denied the Canandaigua City School District’s application. In February 2009, The President of the Board of Education of the Canandaigua City School District announced it would no longer use chickens in its program.
- Spring Arbor University. 2008. United Poultry Concerns provided educational materials to Spring Arbor University in Spring Arbor Michigan concerning Spring Arbor’s use of live chickens in its CORE 100 educational program at Cedar Bends Farm. Dr. Betty Overton-Adkins, Vice President for Academic Affairs wrote to United Poultry Concerns on November 17, 2008: “We are circulating to our CORE 100 team the materials you sent.”
- Kansas State University. 2007. United Poultry Concerns persuaded the KSU administration to enforce its policy against “bringing contraband items into a University venue or throwing any object at the playing area during an athletic event” following an episode on February 19, 2007 in which students threw four chickens 30 feet from the stands onto the basketball court as a “student prank” resulting in injury and death to the birds. No further incidences of this type have been reported.

- Carnegie Science Center. 2000-2001. United Poultry Concerns worked to stop the Carnegie Science Center in Pittsburgh, PA from opening a children's "Early Animal Habitat Zone & Chick Hatchery" exhibit in 2000, on grounds of animal cruelty and public misinformation. Following the opening of the exhibit, UPC persuaded the Carnegie Science Center to shut down the hatchery exhibit. In an email dated October 16, 2001, UPC was advised that "Carnegie Science Center has ceased the chick hatchery operation due to its failure as an educational exhibit."
- Olathe Unified School District. 1999. United Poultry Concerns persuaded the Olathe District Schools Science Program in Olathe, Kansas to eliminate from the curriculum its BSCS laboratory exercise "The Behavior and Development of Chicks" following an investigation into the cruelty and uselessness of this program and its desensitizing effect on the students. In a formal letter dated December 15, 1999, the Olathe District Schools Science Coordinator advised UPC that the BSCS program "will no longer be used in Olathe District Schools science courses."
- Horizon High School. 1997. UPC persuaded Horizon High School in Phoenix, Arizona in 1997 to adopt a Code of Ethics after a gang of high school seniors released fifty hens on school property on April 11, 1997, and proceeded to abuse and kill them for fun.

HERO and UPC qualify as "person[s]" as defined by FS 120.52(14) and FS 1.01(3) (includes corporations and all other groups or combinations) having a "substantial interest in" implementing FS 1006.31(4)(c). As explained above, UPC's Executive Director Karen Davis, Ph.D. was solicited by Alachua County Prosecuting Attorney Geoffrey Fleck to provide expert testimony on the alleged animal cruelty committed by students at Hawthorne High School in relation to brutally mishandling a chicken kept on school grounds as part of an instructional course on raising and killing chickens.

### **PROPOSED RULEMAKING**

First, the Department must apply a liberal construction to all provisions of the Florida K-20 Education Code "to the end that its objectives may be effected." FS 1000.01(2). Those objectives arise from FS 1006.31(4)(c), FS 1003.42(2)(k), and FS 1003.47(1)(a, g). The Hawthorne High School course, run by an incompetent FFA teacher, housing birds on school grounds without the knowledge of the principal, provides a crisp illustration why the Department must enact rules to

deter such future subversion of the Code's humane treatment objectives. Further, the Department should review Ch. 583-585 FS concerning animal disease, inspection, control, and poultry carcass handling regulations to the extent not harmonized with a middle or high school environment, particularly given the risk of exposing children to pandemic avian (H5N1) flu. *See [www.doh.state.fl.us/Disease\\_ctrl/epi/htopics/BirdFlu.htm](http://www.doh.state.fl.us/Disease_ctrl/epi/htopics/BirdFlu.htm)*. Lastly, the cavalier tossing of dying chickens' sometimes bloodied and headless bodies into a bucket no doubt spreads blood-borne pathogens throughout the classroom, exposing children to possible zoonoses without any notable protection.<sup>2</sup> To that end, Petitioners offer their expertise and resources to assist the Department.

**FS 1006.31(4)(c)** requires the SIMC to establish performance standards that require instructional materials to encourage "humane treatment of people and animals." Rules prohibiting animal slaughter in the classroom would effectuate this precise goal and fairly meet the directive of FS 1006.31(4)(c). However, to take no steps in this regard (at least none found in the FAC or any other guidelines issued by the Department<sup>3</sup>) evinces utter disregard for legislative command. If there were ever a time to enact rules, it has come in the visage of Hawthorne High.

**FS 1003.42(2)(k)** requires members of public school instructional staff to teach "kindness to animals" in a manner "efficiently and faithfully, using the books and materials required to meet the highest standards of professionalism ... following the prescribed courses of study, and employing approved methods of instruction." Whether in theory or as applied, precious little of Mr. Shaw's "Broiler Project" even remotely touches upon this requirement. Though no rulemaking mandate flows from FS 1003.42(2)(k), nothing prevents the Department from undertaking discretionary

---

<sup>2</sup> The Gordon video does not show him wearing a mask or gloves. It is not believed that Mr. Shaw had the students wear smocks, gloves, masks, boots, or other clothing impermeable to organic matter to protect them from contracting disease, much less suffering personal injury from improper restraint of the birds.

<sup>3</sup> A public records request turned up nothing responsive.

rulemaking to provide additional guidance to schools with woefully inadequate programming oversight as seen here.

**FS 1003.47(1)(a)** bars surgery or dissection of birds in public schools. For the reasons stated above, and given the state of poultry science as of 2010, no justification exists to permit another “Broiler Project” in any Florida K-12 school, particularly by individuals without expert qualifications or competence as seen in the case of Mr. Shaw. **FS 1003.47(1)(g)** requires supervision of a “competent science teacher” and, “whenever feasible, specifically qualified experts in the field should be consulted.” Lastly, most disturbing is Principal Craig’s utter lack of familiarity with the fact that likely dozens of chickens resided on campus. **FS 1003.47(1)(h)** forbids keeping of live animals on school grounds unless humanely and safely kept.

### **CONCLUSION**

Ms. Hargreaves, Dr. Davis, HERO, and UPC ask that the Commissioner give due consideration to this petition and proceed with the necessary steps to promulgate new or clarified rules in the areas of humane treatment identified above, including but not limited to banning animal slaughter in the classroom.

Dated this Mar. 9, 2011

ANIMAL LAW OFFICES

Digitally signed by Adam P. Karp  
Location: Bellingham, WA  
Date: 2011.03.09 12:56:10 -08'00



---

Adam P. Karp, WSB No. 28622  
Attorney for Petitioners Davis, UPC, Hargreaves, and HERO

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the Mar. 9, 2011, I caused a true and correct copy of the foregoing document to be served upon the following person(s) in the following manner:

- ☒ U.S. Mail, First Class, Postage Prepaid
- ☒ Email

ERIC J. SMITH  
*Commissioner of Department of Education*  
Office of the Commissioner  
Turlington Bldg., Ste. 1514  
325 West Gaines St.  
Tallahassee, FL 32399  
(850) 245-0505  
F: (850) 245-9667  
[commissioner@fldoe.org](mailto:commissioner@fldoe.org)

W. DANIEL BOYD, JR. & BOARD MEMBERS  
*Superintendent of Schools*  
Alachua County Public Schools  
620 E. University Ave.  
Gainesville, FL 32601  
(352) 955-7300  
[supt@gm.sbac.edu](mailto:supt@gm.sbac.edu)  
[boardmembers@gm.sbac.edu](mailto:boardmembers@gm.sbac.edu)

VEITA JACKSON-CARTER  
*Hawthorne Middle/High School Principal*  
Hawthorne High School  
21403 SE 69<sup>th</sup> Ave.  
Hawthorne, FL 32640  
(352) 481-1900  
F: (352) 481-4859  
[jacksonvl@gm.sbac.edu](mailto:jacksonvl@gm.sbac.edu)



Adam L. Karp, WSPA No. 28622 .

A

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT  
IN AND FOR ALACHUA COUNTY, FLORIDA

AMENDED INFORMATION

01-2009-CF-002003

STATE OF FLORIDA

Plaintiff,

Case Number: 01-2009-CF-002002-A-B

DIVISION I

vs.

PATRICK DOUGAN, W/M, 03/17/1991

ROBERT SYLVESTER GORDON, JR., B/M, 06/09/1990

CHARGES:

I) CRUELTY TO ANIMALS

INFORMATION

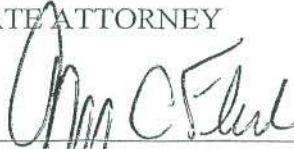
IN THE NAME AND BY THE AUTHORITY OF THE STATE OF FLORIDA:

WILLIAM P. CERVONE, STATE ATTORNEY for the Eighth Judicial Circuit, prosecuting for the State of Florida, under oath, alleges by information that PATRICK DOUGAN and ROBERT SYLVESTER GORDON, JR., in Alachua County, Florida, on or about April 15, 2009, did intentionally commit an act or acts to any animal, to-wit: a chicken that resulted in the cruel death, or excessive or repeated infliction of unnecessary pain or suffering, or caused the same to be done, to-wit: by smashing and torturing it, contrary to Section 828.12 (2) Florida Statutes. (F3/L3)

STATE OF FLORIDA  
COUNTY OF ALACHUA

Personally appeared before me the undersigned GEOFFREY C. FLECK Assistant State Attorney, Eighth Judicial Circuit of Florida, who, being first duly sworn, says that the allegations set forth in the foregoing INFORMATION are based upon facts that have been sworn to as true, and which if true, would constitute the offense therein charged, and is filed in good faith, and does hereby certify that he has received testimony under oath from the material witness or witnesses for the offense.

WILLIAM P. CERVONE  
STATE ATTORNEY

  
\_\_\_\_\_  
GEOFFREY C. FLECK  
Assistant State Attorney  
Florida Bar No.: 199001

The foregoing instrument was acknowledged before me this 29 day of May, 2009 by GEOFFREY C. FLECK, Assistant State Attorney, who is personally known to me and who did take an oath.



CHERYL B. JARVIS  
MY COMMISSION # DD 573643  
EXPIRES: July 22, 2010  
Bonded Thru Budget Notary Services

  
\_\_\_\_\_  
NOTARY PUBLIC



IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT  
IN AND FOR ALACHUA COUNTY, FLORIDA

STATE OF FLORIDA  
Plaintiff,

Case Number: 01-2009-CF-002002-A  
C.R.#: ACAS09-2724  
DIVISION I

vs.

PATRICK RUEBIN DOUGAN  
Defendant.

**CASE ACTION REPORT**  
**NOLLE PROSEQUI**

The State of Florida, by the undersigned authority, enters a **NOLLE PROSEQUI** in the above entitled action dismissing **ALL CHARGES** due to:

1D    FACTS DO NOT CONSTITUTE A CRIMINAL OFFENSE

**EVIDENCE:**


The Evidence Custodian is hereby authorized to:

☐ Retain custody of the evidence until instructed otherwise.

☒ Dispose of the evidence in accordance with Florida Statutes.

I HEREBY CERTIFY that a copy hereof has been furnished to HORACE M. MOORE, SR., ESQUIRE, POST OFFICE BOX 2146, 235 S MAIN ST, GAINESVILLE, FL 32602, this 7 day of December, 2009.

WILLIAM P. CERVONE  
STATE ATTORNEY

  
\_\_\_\_\_  
GEOFFREY C. FLECK  
Assistant State Attorney  
Florida Bar Number: 199001

cc: VERNON SAWYER  
~~JENNIFER RITCHEY~~, ALACHUA COUNTY ANIMAL SERVICES  
JAIL  
ACAS EVIDENCE CUSTODIAN  
PROBATION / PAROLE

**B**

## Activity Card

A09-002724-1 INVESTIGAT/CRU Priority Level: 4

Total Animals: 1 Animal Type: CHICKEN

Activity Address: 21500 SE 69 AVE

Activity Comment: MAKE CONTACT ABOUT CRUELTY CASE

**Caller Information:**

P999529 INVESTIGATOR RITCHEY  
3400 NE 53 AVE  
GAINESVILLE FL 32609

**Result Codes:**

3 INTER  
1 COMP

Officer: P99952 RITCHEY

Clerk: JRITCHIE

Call Date: 04/21/09 10:39 AM

New Date: 04/21/09 10:39 AM

Dispatch Date: 04/21/09 10:42 AM

Working Date: 04/21/09 01:10 PM

Complete Date: 04/21/09 02:28 PM

Memo:

4/21/09 Myself and Investigator Santerfeit went out to Hawthorne High School about the chicken video. I spoke to the Principal Craig and he was unaware of the video or that there were any animals located on school grounds. We spoke to Deputy Stephens and played the video for her and Principal Craig. Deputy Stephens was able to identify both adult males in the video as well as the voice of one of them that was speaking in the video. We spoke to Allen Shaw the teacher of the FFA program about the incident. Mr. Shaw did say that they were teaching the kids how to properly kill and prepare chicken they had raised. I explained about the video to Mr. Shaw and he was unaware that the incident had happened. Mr. Shaw did state that the kids frequently brought video cameras to class. Mr. Shaw explained that he has 40 students in that class and that he helped each student kill their chicken and prepare it. Mr. Shaw stated that he must have been busy helping another student when the incident occurred. Mr. Shaw clearly stated that the way the chicken was killed was not an approved method taught in his class. (J.Ritchey)



☐ ARREST ☒ SWORN COMPLAINT ☐ HOLD

☐ JUVENILE ☐ NOTICE TO APPEAR

OBTS NUMBER:

# EIGHTH JUDICIAL CIRCUIT

AGENCY CASE REPORT NUMBER:

09-2724

NAME OF SUBJECT (LAST, FIRST, MI):

Gordon, Robert

ALIAS / MAIDEN:

911 HOME ADDRESS (STREET, APARTMENT NUMBER, ETC.):

CITY:  
Hawthorne

STATE:  
Florida

ZIP CODE:

TELEPHONE NUMBER:

( )

BUSINESS / SCHOOL ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.):  
Hawthorne High School / 21403 SE 69 avenue

CITY:  
Hawthorne

STATE:  
Florida

ZIP CODE:  
32640

TELEPHONE NUMBER:

(352) 481-1900

MAILING ADDRESS (PO BOX, ETC. IF DIFFERENT THAN 911 ADDRESS):

SCARS, MARKS, TATTOOS, FACIAL HAIR, UNIQUE PHYSICAL FEATURES (LOCATION, TYPE, DESCRIPTION):

RACE:  
☐ WHITE ☐ AMERICAN INDIAN  
☒ BLACK ☐ ASIAN / ORIENTAL

SEX:

male

DATE OF BIRTH:  
6/09/1990

HEIGHT:

WEIGHT:

HAIR COLOR:

EYE COLOR:

COMPLEXION:

BUILD:

DRIVERS LICENSE / STATE ID NUMBER:

STATE OF DL / ID:

SOCIAL SECURITY NUMBER:

PHOTO NUMBER:

PLACE OF BIRTH:

COUNTRY OF CITIZENSHIP:

SUBJECT'S OCCUPATION:  
Student

SPN NUMBER:

AGENCY ORI NUMBER:

SO ID / AGENCY ID / NUMBER:

BOOKING NUMBER:

LOCATION OF ARREST:

DATE OF ARREST:

TIME OF ARREST (MILITARY):

DATE OF BOOKING:

TIME OF BOOKING (MILITARY):

SUBJECT IDENTIFIED BY WHOM (VICTIM, WITNESS, LEO, ETC.):  
Deputy Stephens - school resource officer

SUBJECT'S NAME VERIFIED BY (PHOTO ID, FAMILY MEMBER, KNOWN TO OFFICER, ETC.):

#1 (NAME):  
Dougan, Patrick

DATE OF BIRTH:  
3/17/1991

RACE:  
white

SEX:  
male

COURT NUMBER:

☐ ARRESTED  
☒ SWORN COMPLAINT  
☐ NTA

☒ FELONY  
☐ MISDEMEANOR  
☐ TRAFFIC CASE

JUVENILE:  
☐ YES  
☒ NO

#2 (NAME):

DATE OF BIRTH:

RACE:

SEX:

COURT NUMBER:

☐ ARRESTED  
☐ SWORN COMPLAINT  
☐ NTA

☐ FELONY  
☐ MISDEMEANOR  
☐ TRAFFIC CASE

JUVENILE:  
☐ YES  
☐ NO

JUVENILE DISPOSITION:  
☐ RELEASED TO JAC  
☐ ISSUED NTA AND RELEASED

NAME OF PARENT / GUARDIAN (NOTIFIED ☐ YES ☐ NO):

WORK TELEPHONE NUMBER:

( )

PARENT / GUARDIAN HOME ADDRESS (STREET, APARTMENT #, PO BOX, ETC.):

CITY:

STATE:

ZIP CODE:

HOME TELEPHONE NUMBER:

( )

#1 (NAME):

ADDRESS:

TELEPHONE NUMBER:

( )

#2 (NAME):

ADDRESS:

TELEPHONE NUMBER:

( )

OFFENSE DESCRIPTION: A person who intentionally commits an act to an animal which results in the cruel death, or excessive or repeated infliction of unnecessary pain or suffering.....

☒ FELONY  
☐ MISDEMEANOR  
☐ TRAFFIC ☐ NTA

COMPLETE STATUTE / ORDINANCE NUMBER:  
828.12 (2)

VICTIM NOTIFICATION:  
ARREST: ☐ YES ☐ NO  
RELEASE: ☐ YES ☐ NO

☐ WARRANT ☐ JUVENILE PU ORDER ☐ CIVIL ORDER ☐ CITATION  
☐ CAPIAS  
NUMBER:

DATE OF OFFENSE:  
4/15/09

TIME OF OFFENSE:  
~1 pm

BAIL AMOUNT:

VICTIM'S TELEPHONE NUMBER:

( )

VICTIM (NAME):  
chicken

ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.):  
21430 SE 69 Avenue

CITY:  
Hawthorne

STATE:  
Florida

ZIP CODE:  
32640

OFFENSE DESCRIPTION:

☐ FELONY  
☐ MISDEMEANOR  
☐ TRAFFIC ☐ NTA

COMPLETE STATUTE / ORDINANCE NUMBER:

VICTIM NOTIFICATION:  
ARREST: ☐ YES ☐ NO  
RELEASE: ☐ YES ☐ NO

☐ WARRANT ☐ JUVENILE PU ORDER ☐ CIVIL ORDER ☐ CITATION  
☐ CAPIAS  
NUMBER:

DATE OF OFFENSE:

TIME OF OFFENSE:

BAIL AMOUNT:

VICTIM'S TELEPHONE NUMBER:

( )

VICTIM (NAME):

ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.):

CITY:

STATE:

ZIP CODE:

PROSECUTIVE SUMMARY

THE FOLLOWING INCIDENT OCCURRED AT (ADDRESS / LOCATION):  
21403 SE 69<sup>th</sup> Avenue

CITY OF:  
Hawthorne

COUNTY OF:  
Alachua

STATE OF:  
Florida

A video clip that was posted on the internet of a chicken being tortured by Robert Gordon and Patrick Dougan was e-mailed to Field Supervisor Vernon Sawyer at Alachua County Animal Services. The video took place during Mr. Gordon's and Mr. Dougan's Future Farmers of America (FFA) class at Hawthorne High School. Supervisor Sawyer contacted Principal Robert Craig of Hawthorne high school to find out if he knew anything about the incident. Principal Craig stated that he knew nothing about and in fact he did not believe that they had any animals housed on campus. At this time Supervisor Sawyer turned the case over to me for further investigation. I and Investigator Santerfeit went out to Hawthorne High School to make contact and speak to some of the parties involved. We first spoke to Principal Craig and Deputy Stephens, with the Alachua County Sheriff's Department and played the video for them. While watching the video Deputy Stephens recognized one voice that was saying, "Tear it apart", as Patrick Dougan. Patrick Dougan then appeared in the video stating if you want to see more of that, come out to Hawthorne High School. Deputy Stephens recognized Robert Gordon as the person holding the chicken above his head and smashing it into the ground. Mr. Gordon then picks up the chicken while it's still flopping around and the video cuts off. Myself and Investigator Santerfeit then went and spoke to Mr. Allen Shaw who was the teacher of the FFA class. While we waited for class to get out we noticed that the location of the video was directly outside of the rear classroom door. The Livestock Pavilion was at the same angle as the video.

☐ MANDATORY APPEARANCE IN COURT AT:

DATE OF APPEARANCE:

TIME OF APPEARANCE:

☐ AM  
☐ PM

I AGREE AND PROMISE TO COMPLY AND ANSWER TO THE CHARGES AND INSTRUCTIONS SPECIFIED IN THIS NOTICE TO APPEAR. WILLFUL REFUSAL TO ACCEPT AND SIGN THIS NOTICE TO APPEAR MAY RESULT IN PHYSICAL ARREST. I UNDERSTAND MY SIGNATURE IS NOT AN ADMISSION OF GUILT OR WAIVER OF MY RIGHTS.

DEFENDANT (SIGNATURE):

DATE:

WORN TO AND SUBSCRIBED TO BEFORE ME THIS:

I SWEAR THE ABOVE, AND REVERSE AND ATTACHED PAGES AND STATEMENTS ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

5TH DAY OF MAY

LIN SANTERFEIT

MY COMMISSION # DD 452412

EXPIRES: July 18, 2009

Bonded Thru Notary Public Underwriters

SIGNATURE:

NAME (PRINT):

SIGNATURE:

AGENCY:

LEO ID NUMBER: C059



## Geoff Fleck

---

From: Geoff Fleck  
Sent: Friday, July 17, 2009 3:42 PM  
To: Jennifer Ritchey  
Subject: RE: Chicken case

Yeah. That's what I mean - the teacher shoulda ratted the kids out right away.

-----Original Message-----

From: Jennifer Ritchey [mailto:jritchey@AlachuaCounty.US]  
Sent: Fri 7/17/2009 3:26 PM  
To: Geoff Fleck  
Subject: RE: Chicken case

When we found out about it the students had already taken them home, in pieces. There was nothing too necropsy. The school Never knew about it till we told them. In fact the principal at the school, even after he saw the video, said that there were no animals housed on school grounds. Yet we walked out back of the school and found a large chicken house that had two chickens living it.

From: Geoff Fleck [mailto:fleckg@SAO8.ORG]  
Sent: Friday, July 17, 2009 11:56 AM  
To: Jennifer Ritchey  
Subject: RE: Chicken case

I know that's what the routine was, but I was hoping in this case since a criminal prosecution was contemplated that the evidence would have been be seized by the school as soon as they found out about the incident. It just occurred to me that they never came forward, did they? You and Vernon only found out about it when he ws sent the U-Tube video, right? Shame on the school.

-----Original Message-----

From: Jennifer Ritchey [mailto:jritchey@AlachuaCounty.US]  
Sent: Thu 7/16/2009 1:48 PM  
To: Geoff Fleck  
Subject: RE: Chicken case

We never got the chicken. As part of the class the students butchered them and packaged them for the freezer. Then take them home to eat.

From: Geoff Fleck [mailto:fleckg@SAO8.ORG]  
Sent: Thursday, July 16, 2009 10:45 AM  
To: Jennifer Ritchey  
Subject: Chicken case

What ever happened to the chicken??  
Necropsy?  
In evidence?

☐ ARREST ☒ SWORN COMPLAINT ☐ HOLD

# SUPPLEMENT

## EIGHTH JUDICIAL CIRCUIT

SPN NUMBER:

AGENCY CASE REPORT NUMBER:

OBTS NUMBER:

AGENCY ORI NUMBER:

ALIAS / MAIDEN:

NAME OF SUBJECT (LAST, FIRST, MI):

Dougan, Patrick

RACE:

☒ WHITE ☐ AMERICAN INDIAN  
☐ BLACK ☐ ASIAN / ORIENTAL

SEX:

male

DATE OF BIRTH:

03/17/1991

HEIGHT:

WEIGHT:

JAIL NUMBER:

SO ID / AGENCY ID / NUMBER:

WITNESS

#3 (NAME):

ADDRESS:

TELEPHONE NUMBER:

#4 (NAME):

ADDRESS:

TELEPHONE NUMBER:

CHARGE 3

OFFENSE DESCRIPTION:

☐ FELONY  
☐ MISDEMEANOR  
☐ TRAFFIC ☐ NTA

COMPLETE STATUTE / ORDINANCE NUMBER:

VICTIM NOTIFICATION:

ARREST: ☐ YES ☐ NO  
RELEASE: ☐ YES ☐ NO

☐ WARRANT ☐ JUVENILE PU ORDER ☐ CIVIL ORDER ☐ CITATION

DATE OF OFFENSE:

TIME OF OFFENSE:

BAIL AMOUNT:

VICTIM'S TELEPHONE NUMBER:

NUMBER:

VICTIM (NAME):

ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.):

CITY:

STATE:

ZIP CODE:

CHARGE 4

OFFENSE DESCRIPTION:

☐ FELONY  
☐ MISDEMEANOR  
☐ TRAFFIC ☐ NTA

COMPLETE STATUTE / ORDINANCE NUMBER:

VICTIM NOTIFICATION:

ARREST: ☐ YES ☐ NO  
RELEASE: ☐ YES ☐ NO

☐ WARRANT ☐ JUVENILE PU ORDER ☐ CIVIL ORDER ☐ CITATION

DATE OF OFFENSE:

TIME OF OFFENSE:

BAIL AMOUNT:

VICTIM'S TELEPHONE NUMBER:

NUMBER:

VICTIM (NAME):

ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.):

CITY:

STATE:

ZIP CODE:

CHARGE 5

OFFENSE DESCRIPTION:

☐ FELONY  
☐ MISDEMEANOR  
☐ TRAFFIC ☐ NTA

COMPLETE STATUTE / ORDINANCE NUMBER:

VICTIM NOTIFICATION:

ARREST: ☐ YES ☐ NO  
RELEASE: ☐ YES ☐ NO

☐ WARRANT ☐ JUVENILE PU ORDER ☐ CIVIL ORDER ☐ CITATION

DATE OF OFFENSE:

TIME OF OFFENSE:

BAIL AMOUNT:

VICTIM'S TELEPHONE NUMBER:

NUMBER:

VICTIM (NAME):

ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.):

CITY:

STATE:

ZIP CODE:

CHARGE 6

OFFENSE DESCRIPTION:

☐ FELONY  
☐ MISDEMEANOR  
☐ TRAFFIC ☐ NTA

COMPLETE STATUTE / ORDINANCE NUMBER:

VICTIM NOTIFICATION:

ARREST: ☐ YES ☐ NO  
RELEASE: ☐ YES ☐ NO

☐ WARRANT ☐ JUVENILE PU ORDER ☐ CIVIL ORDER ☐ CITATION

DATE OF OFFENSE:

TIME OF OFFENSE:

BAIL AMOUNT:

VICTIM'S TELEPHONE NUMBER:

NUMBER:

VICTIM (NAME):

ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.):

CITY:

STATE:

ZIP CODE:

PROSECUTIVE SUMMARY - CONTINUED

When we spoke to Mr. Shaw he stated, that he was instructing the class of 40 students on Wednesday as to the proper way to kill and prepare a chicken. The students receive baby chicks that they learn to raise and then show. The chickens are housed in a large coop on the back of the school campus. Mr. Shaw was unaware of the incident with Mr. Gordon's chicken and was very upset by it. Mr. Shaw wanted to be very clear that the way Mr. Gordon handled the chicken was not the method he was teaching in class. Mr. Shaw was responsible that day for helping each student kill and properly package their chicken. Mr. Shaw believed the incident occurred while he was busy helping other students. I asked Mr. Shaw if he remembered there being a video camera in the class that day and he stated that the students frequently recorded things they were doing in class.

C



One category that is popular with the Alachua County Youth Fair and Livestock Show is the Broiler Project. This project teaches the 4-H and FFA members how to care for, select, manage, and process a meat type chicken.

The students or FFA chapters receive one day old chicks from the County Extension Office in early January and then practice appropriate, specific husbandry skills until the culmination of the project in late March. Broilers have an extremely high feed conversion rate which promotes rapid weight gain. If they are not processed, the birds become too heavy and are unable to walk. Due to the genetics of the broiler (Ross X Ross breed), these chickens must be processed at the completion of the project.

The following procedures are used for the humane processing of the birds:

1. Proper restraint of the bird
2. Dislocation of the neck which brings immediate and humane death
3. Removal of head, neck, and feet
4. Removal of skin and feathers
5. Separation of legs and thighs from the carcass
6. Leg and thigh meat are submerged in ice water
7. Breast meat is removed from the carcass
8. Breast meat is submerged in ice water
9. Separation of wings from the carcass
10. Wings are submerged in ice water
11. Gizzards and livers are removed from the carcass
12. Livers are submerged in ice water
13. Gizzards are cleaned under running water
14. Gizzards are submerged in ice water
15. Disposal of non edible portions of the carcass

These procedures are specifically demonstrated and outlined in publications from all State Extension Services.

The Agritechnology Framework includes the following performance standards which target this project:

06.01 Demonstrate approved practices in the management, health, safety, and technology of the animal industry.

LA.A.1.4.1, 2, 3, 4; LA.A.2.4.4; LA.B.1.4.1, 2, 3; LA.B.2.4.1, 2, 3; LA.C.1.4.1; LA.C.2.4.1; SC.B.1.4.1, 2; SC.D.1.4.1; SC.F.1.4.1, 2, 3, 7, 8; SC.F.2.4.1, 3; SC.G.1.4.1; SC.G.2.4.2, 3

08.01

Develop, implement, and maintain work based learning through Supervised Agricultural Experiences (SAE). LA.A.1.4.1, 2, 3, 4; LA.A.2.4.4; LA.B.1.4.1, 2, 3; LA.B.2.4.1, 2, 3; LA.C.1.4.1; LA.C.2.4.1

12.01 Identify wholesale cuts of beef, pork, lamb, and poultry. LA.A.1.4, 2, 4; LA.B.1.4, 2, 4



14.01 Identify parts of the skeletal system of selected animals. LAA 1.4, 2.4; LAC 1.4, 2.4, 3.4; SCF 1.4, 2.4

14.02 Compare human skeletal system to that of other animals. LAA 1.4, 2.4; LAC 1.4, 2.4, 3.4; SCF 1.4, 2.4

14.03 Identify parts and functions of the following systems of selected animals:

- respiratory system
- urinary system
- digestive system
- cardiovascular system
- reproductive system
- nervous system

LAA 1.4, 2.4; LAC 1.4, 2.4, 3.4; SCF 1.4, 2.4

D

P R O C E E D I N G S

\* \* \* \* \*

THEREUPON,

**SAMANTHA FAIRCLOTH**

was called as a witness, having been first duly sworn, was examined and testified as follows:

\* \* \* \* \*

THE WITNESS: Yes.

DIRECT EXAMINATION

BY MR. FLECK:

Q. Samantha, "Hi." This is Geoff Fleck. I'm a prosecutor, and I'm going to ask you some questions.

Your name has been furnished to me by the defense in this case -- that is the case in involving Mr. Dougan and Mr. Gordon -- as a possible witness and somebody who might know something about what happened at the Hawthorne High School. Are you aware of it?

A. Yeah.

Q. Okay. Have you talked to either Mr. Moore or Ms. Smith or anybody else about what happened?

A. No.

Q. Were you present in Mr. Shaw's class?

A. Yeah.

Q. And do you remember an incident that occurred where -- oh, I guess the best way to say it is

1 Mr. Gordon killed a chicken, and it's given rise to a  
2 situation; you know, a legal situation. Are you aware  
3 of that?

4 A. Yeah.

5 Q. Okay. Can you tell me what you saw?

6 A. Ah, I just saw Robert just pick up the  
7 chicken and like throw it on the ground.

8 Q. Okay. "Robert" is Robert Gordon?

9 A. Yeah.

10 Q. And did this happen outside?

11 A. Yeah.

12 Q. And did you have a camera?

13 A. Yeah.

14 Q. Oh, so you're the person who took the video  
15 of it?

16 A. Yeah.

17 Q. Okay. So you were able to see, obviously,  
18 what's on the video. Did anything -- well, let me ask  
19 you this. How did the video end up on Utube?

20 A. I don't know how it got on Utube. I put it  
21 on MySpace but that's as far as it went.

22 Q. Okay. Sorry. I'm in a moving vehicle, and  
23 my wife just hit something. What did you put it on?

24 A. MySpace.

25 Q. MySpace. Okay. Do you know how it got sent

1 to the Alachua County animal control people?

2 A. No, I don't.

3 Q. All right. Did you intend for it to get to  
4 the shelter people?

5 A. No.

6 Q. Okay. During the course of the video, can we  
7 hear your voice on it anywhere? Did you say anything  
8 during your videoing?

9 A. Yeah.

10 Q. What did you say?

11 A. I just said, "Oh, my God."

12 Q. You said what?

13 A. "Oh, my God."

14 Q. And why did you say "Oh, my God"?

15 A. Because I just -- it just shocked me.

16 Q. What?

17 A. It shocked me, I guess.

18 Q. Sorry. I can't understand you.

19 A. It just shocked me that he threw the chicken.

20 Q. Okay. Did it shock you in a bad way?

21 A. Yeah.

22 Q. Was that something different from what  
23 Mr. Shaw had taught in his class as far as the  
24 handling of chickens?

25 A. Yeah.



1 Q. Okay. Did it seem cruel to you?

2 A. Yeah.

3 Q. What did you say?

4 A. "Yeah."

5 Q. Yeah? After you stopped videotaping, did you  
6 continue to watch what was happening or what happened  
7 with the chicken?

8 A. I think he just picked it up and put it in  
9 the bucket. I don't really remember.

10 Q. Who picked it up?

11 A. Robert.

12 Q. Okay. And was it dead or alive?

13 A. It was like flopping around. It might have  
14 been dead by the time he picked it up.

15 Q. Okay. And there is a face that makes its  
16 appearance in your video, and -- do you know what I'm  
17 talking about?

18 A. Yeah.

19 Q. Who was that?

20 A. Patrick.

21 Q. Is that Patrick Dougan?

22 A. Yeah.

23 Q. Okay. And do you remember what he said?

24 A. Sort of.

25 Q. I'm sorry. What did you say?

1 A. I kind of remember.

2 Q. You don't remember?

3 A. Yeah, I remember some of it.

4 Q. Sorry. I'm just having trouble hearing you.

5 It's like you're too close to the mic.

6 A. I remember some of it.

7 Q. Oh, you remember some of it. What do you  
8 remember?

9 A. Just that "If you want to see more, come to  
10 Hawthorne High."

11 Q. Did he seem pretty excited?

12 A. Yeah, I guess.

13 Q. Okay. All right. The video -- have you seen  
14 your video on MySpace or Utube or anywhere else?

15 A. No.

16 Q. Okay. It's pretty short. Let me just take a  
17 guess and say it's a minute long. Okay? How long had  
18 you videotaped? Did you videotape more than a minute  
19 or so?

20 A. No. That was all.

21 Q. Sorry?

22 A. That was all that I videotaped.

23 Q. Okay. And was there a reason why you chose,  
24 at that particular time, for that particular period of  
25 time, to turn on your camera?

1 A. No. Like everyone was taking pictures for  
2 like the yearbook, and -- I guess -- or for our "add  
3 wall" (phonetic) in class. So I just had my camera  
4 on, and I just videotaped it when Robert got the  
5 chicken.

6 Q. All right. Do you remember somebody saying,  
7 "That's animal cruelty"?

8 A. Yeah.

9 Q. Do you know who said that?

10 A. Patrick, I think.

11 Q. Okay. Can you please state your address and  
12 best telephone numbers?

13 A. 21409 Southeast 219th Avenue, Island Grove,  
14 Florida.

15 Q. All right. Telephone number?

16 A. 352-481-4281.

17 MR. FLECK: Very good. Thank you very much. I  
18 have no further questions.

19 MS. SMITH: I do have a few questions.

20 CROSS-EXAMINATION

21 BY MS. SMITH:

22 Q. Samantha, this is Michelle Smith. I  
23 represent Robert Gordon in this case.

24 You were a student who participated that day  
25 or was present in this class?



1 A. Yeah.

2 Q. Were you in a position to witness any other  
3 students in that class while they were killing  
4 chickens as well?

5 A. Yeah.

6 Q. Were there any other students who were  
7 killing chickens in a fashion similar to Mr. Gordon?

8 A. Not that I remember.

9 Q. Okay. Did you recall your teacher, Mr. Shaw,  
10 demonstrating, before the class started, how to  
11 properly kill a chicken?

12 A. Yeah.

13 Q. How was that?

14 A. He just like grabbed his head and his feet  
15 and just popped the head out of place and then threw  
16 it in a bucket until it died.

17 Q. Okay. Did you also participate in killing  
18 chickens that day?

19 A. No.

20 Q. Were you in a position to see whether or not  
21 it was difficult to kill a chicken, whether it was  
22 hard to kill a chicken in the way Mr. Shaw  
23 demonstrated?

24 A. It looked pretty easy.

25 Q. Okay.

1 MS. SMITH: I don't think I have any other  
2 questions.

3 MR. MOORE: I have several questions.

4 CROSS-EXAMINATION

5 BY MR. MOORE:

6 Q. Okay. You indicated that Robert threw the  
7 chicken to the ground; correct?

8 A. Yeah.

9 Q. Did the chicken have its head on?

10 A. I think so, but -- I think it was like barely  
11 on. Like you could see like red blood. I guess like  
12 the skin had came off.

13 Q. So when the blood was coming out, he threw  
14 the chicken to the ground; correct?

15 A. Yeah.

16 Q. When he was instructed to pop the chicken's  
17 head, he was instructed to pop the chicken's head but  
18 throw the chicken in the bucket?

19 A. Yeah.

20 Q. So how far was the bucket from where he threw  
21 the chicken?

22 A. It was pretty far.

23 Q. But the blood was coming out when he did it;  
24 correct?

25 A. Yeah.

1 Q. Okay. Now, where he was standing, if he had  
2 popped the neck correctly, he would have had to walk  
3 to the bucket to throw the chicken in the bucket?

4 A. Yeah.

5 Q. When the kids were throwing the chicken in  
6 the bucket, were the chickens alive?

7 A. They were like -- yeah; but they were like --  
8 I guess the nerves, like they were like --

9 Q. They were flopping around; right?

10 A. Yeah.

11 Q. Even when Mr. Shaw popped the chicken's neck  
12 and threw him in the bucket, the chicken was flopping  
13 around?

14 A. Yeah.

15 Q. Dougan was on your video?

16 A. (Nods head.)

17 Q. You say he said, "If you want to see more,  
18 come to Hawthorne High." If you want to see more?  
19 What? Chicken killing?

20 A. I don't know. That's the only day we did it.  
21 So I don't know.

22 Q. About how many chickens did you all kill?

23 A. Well, he did it in every class. So I guess  
24 there was a hundred. I don't know. I don't know.

25 Q. How many chickens did your class kill?

1 A. I'm not sure. I guess about twenty or --

2 Q. And do you know about how many classes

3 Mr. Shaw had?

4 A. No. There are six classes in a day. So I  
5 don't know if he had all six or --

6 Q. So he could have had up to about 120 chickens  
7 killed in that day?

8 A. Yeah.

9 Q. Were you all going to clean those chickens  
10 and eat them at a banquet for the agriculture  
11 department?

12 A. Yeah.

13 Q. Is that what you all did?

14 A. Well, I didn't go to the banquet. I guess  
15 they ate them.

16 Q. Were those chickens kept in a brooder house  
17 somewhere on campus?

18 A. In a what?

19 Q. A brooder house.

20 A. I don't know.

21 Q. That's a square cage that's long, that you  
22 put the biddies in when they're small, with a light at  
23 the top, and you feed them until they get about a  
24 pound, pound and a half, and then you kill them, and  
25 then you have a banquet.



1 A. I don't know. I never seen the chickens  
2 until that day.

3 Q. So you didn't help raise the chickens?

4 A. No.

5 Q. You said your address was 21409 Southeast  
6 219th Avenue?

7 A. (Nods head.)

8 Q. Island Grove, Florida?

9 A. Yeah.

10 Q. What's the zip over there?

11 A. 32654.

12 Q. You said that it appeared to be fairly easy  
13 to pop a chicken's neck?

14 A. (Nods head.)

15 Q. Did any girls pop any chickens' necks?

16 A. Yeah.

17 Q. Did they appear to have any problem popping  
18 the chickens' necks?

19 A. No.

20 Q. Gordon, did he play any sports?

21 A. Yeah.

22 Q. What sports did he play?

23 A. Football and baseball.

24 Q. Do you know if he lifted weights?

25 A. Yeah, I think he was in weight lifting.

1 Q. He's consider to be a very strong young man;  
2 right?

3 A. Yeah.

4 Q. And if a -- strike that.

5 MR. MOORE: I don't have any other questions.

6 Oh, wait. One question.

7 MR. FLECK: Me either.

8 MR. MOORE: Hold up.

9 BY MR. MOORE:

10 Q. Did you see Dougan slam a chicken to the  
11 ground like Gordon?

12 A. No.

13 Q. Did you see him pop a neck?

14 A. No, not that I remember.

15 MR. MOORE: No further questions.

16 MS. SMITH: No further questions from this end.

17 MR. MOORE: Ma'am, you have the right to accept  
18 the fact that she's recording this on the tape recorder  
19 as well as using her court reporting machine. You can  
20 waive coming back to read it. It will be typed up in a  
21 book form. You'll get a copy of it if we go to trial  
22 so you can read it to refresh your memory. But if you  
23 want to come back and just make sure that she took it  
24 down as you said it, then you can come back and do  
25 that. But you can waive it if you want. Most people

1 waive. What would you like to do?

2 THE WITNESS: I guess waive it.

3 MR. MOORE: Thank you.

4 (The deposition was concluded at 11:48 a.m..)

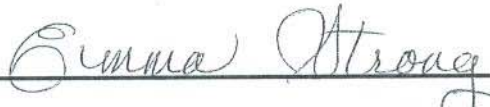
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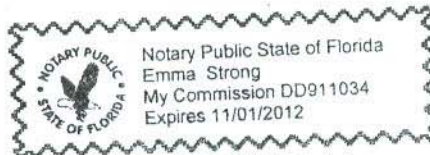
CERTIFICATE OF OATH

STATE OF FLORIDA     )  
COUNTY OF ALACHUA    ) :ss:

I, the undersigned authority, certify that  
**Samantha Faircloth**, personally appeared before me on  
September 25, 2009, and was duly sworn.

WITNESS my hand and official seal this 2nd day  
of October 2009.

  
EMMA STRONG, RPR, FPR  
Advantage Court Reporters  
Commission No. DD911034  
Expires November 1, 2012





**F**

1                                RODNEY TILLMAN, II

2        having been produced and first duly sworn as a  
3        witness, testified as follows:

4                                DIRECT EXAMINATION

5        BY MR. FLECK:

6                Q        Sir, would you please tell me your name?

7                A        Rodney Tillman, II.

8                Q        Ronnie Tillman what?

9                A        The second.

10              Q        Is your dad there, the first?

11              A        It's Rodney. And, yes, my dad is the  
12        first.

13              Q        Rodney, okay, excuse me. And how old are  
14        you?

15              A        Seventeen.

16              Q        Do you know why -- well, let me tell you  
17        this. The defense has listed you as a possible  
18        witness, as somebody who might know something about  
19        an incident involving the chickens, involving  
20        Patrick Dougan and Mr. Gordon. Are you aware of  
21        that?

22              A        Yes, sir.

23              Q        Okay. Have you spoken to Ms. Smith or any  
24        other defense attorney or investigator about what  
25        you know?

1 A No, sir, I haven't.

2 Q You have not?

3 A No, sir.

4 Q No, sir?

5 A No, sir.

6 Q Were you present when Mr. Gordon had the  
7 chicken and the chicken ended up on the ground?

8 A Yes, sir.

9 Q Can you please tell me what you saw?

10 A Well, it was a project in ag class.  
11 Everybody was --

12 Q Can you -- just talk a little slower,  
13 okay? I'm about 300 miles away from you.

14 A It was a project in ag class, and  
15 everybody was popping chickens' necks. It was a  
16 class grade. And it just got a little out of hand,  
17 and people started pulling heads off completely.

18 Q Okay. Was the class inside a building or  
19 outside?

20 A Outside.

21 Q And what did you see Mr. Gordon do to the  
22 chicken?

23 A Just pull the head off.

24 Q You saw him pull the head off?

25 A Yes, sir.

1 Q Okay. Did you see him do anything else?

2 A No, sir, I didn't.

3 Q Did you see Mr. Dougan?

4 A Yes, sir, I did.

5 Q What did you see Mr. Dougan do?

6 A Just pull off the head of the chicken.

7 Q Was that a different chicken?

8 A Yes, sir.

9 Q Okay. Now, the head came all the way off,  
10 huh?

11 A Yes, sir.

12 Q All right. And was this basically a  
13 technique that was taught in the class by the  
14 instructor in order to break the neck of the chicken  
15 and kill it quickly?

16 A Yes, sir, but we weren't supposed to pull  
17 the head off completely.

18 Q Okay. You weren't supposed to pull it  
19 that hard?

20 A No.

21 Q All right. Now, when Mr. Dougan and  
22 Mr. Gordon pulled the heads off the chickens, how  
23 were they holding the chickens? Let's talk about --  
24 instead of doing both at the same time, let's talk  
25 about Mr. Gordon. How was he holding the chicken?

1           A     He had one hand wrapped around the  
2 chicken's head and neck and then the other hand  
3 holding the feet, and he just pulled hard and it  
4 popped.

5           Q     Is one on top and one on the bottom?

6           A     Yes, sir.

7           Q     Which one's on top?

8           A     The right hand.

9           Q     I'm sorry, I meant which part of the  
10 chicken's on top?

11          A     Oh, the head.

12          Q     The head's on top?

13          A     Yeah, I believe. Yeah.

14          Q     Okay. Now, what's your relationship with  
15 Mr. Gordon?

16          A     He's a pretty good friend.

17          Q     How long have you known him?

18          A     Two, three years.

19          Q     Do you socialize with him, do you go  
20 places with him?

21          A     I used to hang out with him when he was in  
22 school, but he done graduated, so not no more.

23          Q     Okay. How about Mr. Dougan?

24          A     He's one of my best friends.

25          Q     One of your best friends?

1 A Yes, sir.

2 Q Okay. Can you tell me whether the kids,  
3 the students in general, were yelling anything or  
4 chanting anything during this event with the  
5 chickens?

6 A No, sir, everybody was either cleaning the  
7 chickens or popping the chickens' necks to kill  
8 them, give them a quick death, or just watching.  
9 That's it.

10 Q Okay. Did you see anybody there with a  
11 videocamera?

12 A Yes, sir, I did.

13 Q And what did you see being videotaped?

14 A The chicken killings.

15 Q Okay. Do you know who was doing the  
16 videotaping?

17 A Yes, sir, I do.

18 Q Who is that?

19 A Samantha Faircloth.

20 Q Can you spell that for me?

21 A S-A-M-A-N-T-H-A F-A-I-R-C-L-O-T-H.

22 Q Okay. And are you aware that her video or  
23 at least part of the video ended up on YouTube  
24 somehow?

25 A I've heard that it did.



1 Q Have you seen the video?

2 A No, sir, I haven't.

3 Q Do you know how it got on YouTube?

4 A No, sir, I don't.

5 Q Did you ever see Gordon take the chicken  
6 and swing it over his head?

7 A It was so long ago, I don't recall it, no,  
8 sir.

9 Q Okay. Did you ever see Gordon take the  
10 chicken and throw it to the ground?

11 A Yes, sir.

12 Q Okay, was that before or after its head  
13 came off?

14 A After.

15 Q After. So he threw it to the ground when  
16 it didn't have a head on it anymore?

17 A Yes, sir.

18 Q Okay. Do you recall having seen  
19 Mr. Dougan say something like, Yeah, that's how we  
20 do it at Hawthorne High School, yeah, yeah, yeah,  
21 you know, something like that, to kind of encourage  
22 Mr. Gordon to do what he was doing?

23 A No, sir, I don't recall that.

24 Q Do you recall anybody saying, Oh, that's  
25 animal cruelty?

1           A     Yes, sir, but we thought they were just  
2     messing around.

3           Q     Sorry, say that again.

4           A     Yes, sir, but we thought they were just  
5     messing around, you know.

6           Q     Okay, do you know who said that?

7           A     No, sir, I don't.

8           Q     All right. What's your status now? Have  
9     you graduated, you still in school or what?

10          A     Yes, sir, this is my senior year.

11          Q     Senior year?

12          A     Yes, sir.

13          Q     When you graduate, what do you want to do?

14          A     Go work for GRU or Clay Electric.

15          Q     I'm sorry, say that again.

16          A     Either work for GRU or Clay Electric.

17          Q     Very good. All right, sir. Anything else  
18     you want to tell me that I haven't asked you about  
19     involving this incident?

20          A     No, sir. Just things got a little out of  
21     hand when we were in class that day, and we just  
22     took it a little too far, that's it.

23          Q     Well, let me ask you about that before we  
24     quit here. Things got a little out of hand. How'd  
25     they get a little bit out of hand? In what way?



1           A     Mr. Shaw instructed us how to do it, and  
2     we just took it too far by, you know, pulling the  
3     heads off way too hard.

4           Q     Okay. Where was Mr. Shaw when all these  
5     heads were popping off? Was he in a place where he  
6     couldn't see this?

7           A     I think his back was turned.

8           Q     Okay.

9           A     He was teaching us how to clean the  
10    chickens.

11          Q     If he had seen that, is it fair to say  
12    that he would not have approved of what was going  
13    on?

14          A     Oh, yes, sir, for sure.

15               MR. FLECK: Thank you very much. Now, I'm  
16    going to order a copy of this transcript, and  
17    it's going to be written into a book that you  
18    can read if you want to. Now, you can ask the  
19    court reporter to let you know when it's ready  
20    to be read, and she'll send you a letter or a  
21    note or something and invite you back to the  
22    court reporter's office to review it, make sure  
23    she took down everything correctly or you can  
24    say, I don't need to do that, I trust the court  
25    reporter, and I give up that right, I waive

1       that right, and I'll let the transcript be  
2       filed in the court file without me reading it.

3               I'm sure the defense, if they call you as  
4       a witness, will give you the transcript in  
5       order to read before you testify in order to,  
6       you know -- so your memory can be refreshed,  
7       but the court reporter has to know now which  
8       way you want to go.

9               THE WITNESS: I'll waive it. I'm good, I  
10       trust her.

11              MR. FLECK: Very good. Most people do.  
12       Thank you very much.

13              MS. SMITH: I would like to ask  
14       Mr. Tillman a few questions before we release  
15       him.

16                               CROSS EXAMINATION

17       BY MS. SMITH:

18              Q     Mr. Tillman, can you hear me?

19              A     Yes, ma'am, I can.

20              Q     Okay, I represent Robert Gordon in this  
21       situation as well.

22                    You were a student participating in this  
23       agriculture class?

24              A     Yes, ma'am, I was.

25              Q     Okay. About how many students were

1 present for this particular day?

2 A Probably a little over 20.

3 Q A little over 20?

4 A Yes, ma'am.

5 Q Okay. Were all of the students  
6 participating in killing the chickens?

7 A Probably half of them. Most of them were  
8 just watching.

9 Q Okay. So more than Mr. Dougan and  
10 Mr. Gordon?

11 A Yes, ma'am. They're the two that just so  
12 happened to get caught on camera.

13 Q And give me the name of your teacher.

14 A Allen Shaw.

15 Q Okay. You said that Mr. Shaw -- did he  
16 demonstrate how to properly kill a chicken?

17 A Yes, ma'am, he did.

18 Q And can you give us a description of how  
19 he demonstrated, a verbal description of how he  
20 demonstrated to properly kill a chicken?

21 A You put two fingers up under the chicken's  
22 neck, then you hold the feet and pull slightly hard,  
23 and it should pop, and then throw them in a bucket  
24 and then let them, you know, die quickly.

25 Q Okay. Did you also participate in the

1 chicken killing?

2 MR. TILLMAN: You're not answering that.

3 You didn't have nothing to do with it. No, you  
4 did not.

5 A Excuse me?

6 Q Did you also participate in killing the  
7 chickens that day?

8 A No, ma'am, I didn't.

9 Q But you witnessed more students, more than  
10 Mr. Dougan and Mr. Gordon, killing chickens?

11 A Yes, ma'am.

12 Q Were you in a position to sort of tell  
13 whether or not it was something that was pretty easy  
14 to do or pretty hard to do?

15 A It was pretty easy.

16 Q Okay. Were there other students in the  
17 class who were killing chickens in a fashion similar  
18 to what you have described in response to  
19 Mr. Fleck's question about how Mr. Gordon killed the  
20 chicken? Were there other students killing them  
21 that way?

22 A Not that I know of, no.

23 Q Okay. And Mr. Shaw, you indicated that  
24 his back was turned while Mr. Gordon was killing the  
25 chickens?

1 A Yes, ma'am.

2 Q Was he in one location the entire time or  
3 was he moving around the outside area where the  
4 chickens were being killed?

5 A He was moving around inside and outside  
6 the building, you know, showing us how to clean the  
7 chickens, kill the chicken, and everything.

8 Q Okay. Did you witness Robert Gordon kill  
9 more than one chicken?

10 A No, ma'am, just one.

11 Q Just one?

12 A Yes, ma'am.

13 Q Do you know if the students in general,  
14 not just specifically Mr. Gordon, but if the  
15 students in general killed more than one chicken  
16 during that period of time?

17 A I don't understand what you're saying.

18 Q How long is your class? How long was this  
19 particular agriculture class?

20 A Fifty minutes.

21 Q Fifty minutes?

22 A Yes, ma'am.

23 Q And that was a five zero, right?

24 A Yes, ma'am.

25 Q For what period of time, like how long did



1 have got in trouble that day.

2 MS. SMITH: Okay, I don't think I have any  
3 other questions right now.

4 REDIRECT EXAMINATION

5 BY MR. FLECK:

6 Q I just have one. Mr. Tillman, why didn't  
7 you kill any chickens?

8 A I was just cleaning them, that's it.

9 MR. FLECK: Thank you.

10 MR. MOORE: I have a couple of questions.

11 CROSS EXAMINATION

12 BY MR. MOORE:

13 Q Mr. Tillman, did Mr. Gordon kill any  
14 chickens after that one incident in which the head  
15 happened to come off?

16 A No, sir, not that I know.

17 Q Now, you said you saw Mr. Dougan pop a  
18 head. He was not on the video. Did his head come  
19 off before or after Mr. Gordon's?

20 A After.

21 Q And did he kill any chickens after that  
22 one head came off?

23 A I'm not sure.

24 Q In reference to the procedure in which you  
25 kill a -- or pop a chicken head, did Mr. Shaw



1 question based on Mr. Moore's questions.

2 RE CROSS EXAMINATION

3 BY MS. SMITH:

4 Q Mr. Tillman, did you observe any blood  
5 skeet out on Mr. Gordon when the head came off?

6 A I'm not sure if any got on him, but I know  
7 some came out for sure.

8 MS. SMITH: Okay. I don't have anything  
9 else.

10 (The witness was excused and the  
11 deposition concluded at 11:30 a.m.)

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F



ONTARIO AGRICULTURAL COLLEGE  
Department of Animal And Poultry Science

Adam P. Karp  
Attorney At Law  
114 West Magnolia Street  
Suite 425  
Bellingham, WA 98225  
USA

18<sup>th</sup> August 2010

Dear Mr. Karp,

I have watched the video entitled "Chicken Bashing at Hawthorne High School" several times. In my opinion, the actions shown depict gross cruelty. This opinion seems to be shared by at least one of the children observing the actions since I could hear the words "...terrible cruelty..." in the background.

It is unclear what the boy's purpose was in slamming the chicken into the ground. Was he trying to stun the chicken, was he trying to kill the chicken, or was he simply being sadistic? No matter his motivation, the action was one of terrible cruelty. I am shocked that school children would be given access to live animals without any apparent supervision. In my opinion the teacher "in charge" should be held at least partly responsible for this act of cruelty.

I have the following comments which may help to clarify the matter of whether the bird depicted in the video was suffering or not.

The usual way for farmers to kill chickens is to dislocate the neck. It is quite a skilled technique to do this properly, and I really do not think that school children should be attempting the procedure. When it is done properly it results in a very high dislocation (between the Atlas and Axis vertebrae). When the dislocation is at this joint, death is fairly swift. It has always been thought that this method was humane i.e. that a bird so treated lost consciousness and died within a few seconds.

However, recent research completed at Guelph suggests that that is not the case. We have had a Graduate Student at Guelph looking at practical ways of euthanizing turkeys on farms (when they are badly injured or seriously ill). Because turkeys are so large, it is very difficult to dislocate the neck manually. We were therefore looking at the possibility of using a non-penetrating captive bolt pistol to stun and kill the birds.

The student compared the usual method of manual dislocation of the neck with the pistol. She found that the pistol was 100% efficient. Turkeys were instantaneously stunned, and died (because of massive brain damage) within 1-2 minutes. However, birds that were manually dislocated took up to a minute to lose consciousness and again died within 2 minutes. The 40-60 seconds that the birds remained conscious is very worrying; I think that birds in this state are suffering terribly. We are now advising all farmers (turkey and chicken) to use this non-penetrating captive bolt pistol instead of manual dislocation of the neck.

With regard to the Hawthorne High School case, it may be that the teacher was quite skilled at dislocating necks and *thought* that this was humane (everyone thought that this was reasonably humane until the recent research described above).

However, I have no idea how skilled the pupils were at dislocating necks. If necks are dislocated at a lower level than the Atlas and Axis, consciousness will last longer. Also, even when the dislocation takes place at the correct level, sometimes the head can be pulled off. Whether or not the head is pulled off, has no effect on the suffering experienced by the bird. In making judgments about consciousness and death, the evidence should come from the head not the body of the bird. So there may be wing-flapping, muscle spasms and twitching in the body - that is of no consequence. It is the head that is experiencing the suffering and it is the head that must be very closely observed. Our student here in Guelph relied heavily on certain reflexes including the pupillary response to light and the blinking of the nictitating membrane (the third eyelid in birds) in response to stimulation, to judge whether or not the birds were conscious and when death occurred.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Ian J.H. Duncan', with a stylized, cursive script.

Ian J.H. Duncan BSc PhD  
Professor Emeritus  
Emeritus Chair in Animal Welfare  
University of Guelph

G



17 June 2010

Karen Davis, Ph.D.  
President  
United Poultry Concerns, Inc.  
PO Box 150  
Machipongo VA 23405-0150

Dr. Davis:

You have asked me in my capacity as a professor and veterinarian to provide a professional opinion on the killing of birds, particularly poultry such as chickens, by the technique known as cervical dislocation. You stated that this was being taught and done at Hawthorne High School in Alachua County, Florida. For identification purposes, I am Emeritus Professor of Veterinary Medicine at the University of California. Much of my career has involved dealing with farmed animals including chickens.

Although cervical dislocation *may* (this is an important qualification) be an effective method of killing chickens, it has to be applied properly. *Nevertheless, there are no scientific studies to confirm that this method is truly humane.* In fact, loss of consciousness may not be instantaneous and electrical activity in the brain may persist for many seconds suggesting that the individual can continue to feel pain and suffer during this time.<sup>1,2,4,5,6</sup> Even if decapitation occurs, this does not result in instantaneous death and suffering can continue for some seconds.<sup>2,3,4,5,6</sup> It is reasonable to conclude, therefore, that movement on the part of animals subjected to these procedures is not simply reflexive and indicates suffering for at least some time after the procedure.

Because the students were being taught the technique of cervical dislocation, it should be obvious that no student likely had the skills to "properly" do this procedure. In cases such as this, professionals such as myself and my colleagues<sup>1</sup> recommend that the birds first be anesthetized. This must be done through acceptable veterinary methods. In the event of incorrect application, this would allow the instructor the opportunity to then kill the individual immediately so that suffering will not occur.

If there are further questions or if I can be of further assistance, please let me know.

A handwritten signature in black ink, appearing to read "Nedim C. Buyukmihci", with a long, sweeping horizontal line extending to the right.

Nedim C. Buyukmihci, V.M.D.  
Emeritus Professor of Veterinary Medicine

Telephone: 505.629.5876  
Facsimile: 505.629.1588  
E mail: ncbuyukmihci@ucdavis.edu

NCB:ztp



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"Cervical dislocation is a technique that has been used for many years and, when performed by well-trained individuals, appears to be humane. However, there are few scientific studies to confirm this observation. ... For poultry, cervical dislocation by stretching is a common method for mass euthanasia, but loss of consciousness may not be instantaneous.  
  
"Data suggest that electrical activity in the brain persists for 13 seconds following cervical dislocation,<sup>127</sup> and unlike decapitation, rapid exsanguination does not contribute to loss of consciousness.  
  
"Manual cervical dislocation is a humane technique for euthanasia of poultry, other small birds, mice, rats weighing < 200 g, and rabbits weighing < 1 kg when performed by individuals with a demonstrated high degree of technical proficiency. In lieu of demonstrated technical competency, animals must be sedated or anesthetized prior to cervical dislocation."
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Mice killed by cervical dislocation or decapitation still had electrical brain activity for up to 10 seconds.
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"The time required for the oxygen tension in decapitated rat brain to decline to a level at which the brain becomes unconscious was estimated to be 2.7 sec. Assuming that decapitation is a powerful arousal stimulus and that the resulting EEG activation (low voltage, fast activity) indicates a conscious awareness of pain and distress the maximum time the pain and distress could be perceived would be 2.7 sec."
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Rats demonstrated brain activity for about 14 seconds after decapitation (which is essentially the same as cervical dislocation).
5. Tidswell, S.J.; Blackmore, D.K. and Newhook, J.C. Slaughter methods: electroencephalographic (EEG) studies on spinal cord section, decapitation and gross trauma of the brain in lambs. *New Zealand Veterinary Journal* 1987 (1 April);35(4):46-49.

“Thus no evidence was obtained to indicate that decapitation causes immediate insensibility, neither was the belief substantiated that severance of the spinal cord, during the slaughter of sheep, hastens the onset of insensibility.”

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“The results show that cerebral activation patterns (neocortical LVFA and hippocampal RSA) may persist for several seconds following decapitation or cervical fracture in conscious rats. Such patterns diminish gradually and slow wave activity disappears altogether in a period of about 5-20 s.”

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## Class Notes

December 17, 2003 | Peter Bernard

Oriole Elementary student honored for saving bird

The Wildlife Care Center recently honored Oriole Elementary School fourth grader Sydale Clark for saving the life of an injured bird.

Clark had attended one of Susan Hargreaves' lectures on the humane treatment of animals. After watching a slide show of some of the Wildlife Care Center's patients and their eventual release into the wild, Clark remembered Hargreaves' message.

"He was on his way to school one morning when he saw an injured mourning dove," Hargreaves said. "He remembered exactly what I told him, cutting holes in a cardboard box to keep the bird in, and then keeping the bird in a quiet, safe place until our ambulance could pick the bird up."

Hargreaves thought it would be a good idea to recognize Clark for his treatment of the dove. Clark received a certificate declaring him an "Extraordinary Animal Hero" at a school assembly.

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Sydale's mother "told me he's always been kind to animals," Hargreaves said. "She said when they lived in California he took a baby hawk that had fallen out of its nest and climbed the tree to put him back in, even after she told him not to."

The mourning dove fully recovered and was released into the wild.

Pine Crest School holiday concert tonight

Pine Crest School's choral and strings holiday concert will be at 7 p.m. tonight in the Stacy Auditorium of Pine Crest School, 1501 NE 62nd St., in Fort Lauderdale.

The concert will feature students from Pine Crest's lower, middle and upper schools. Admission to the concert is free. Call 954 492 4197.

Send school related information to Class Notes, Sun Sentinel, 200 E. Las Olas Blvd., Fort Lauderdale, Fla., 33301 2293. Photographs will be accepted if subjects are identified. Announcements should be sent two weeks in advance.

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## "Miami Kids"



Susan Hargreaves with the Miami heroes

The students say they didn't think they were doing anything special, but a local animal organization called them heroes ... read [Miami students honored for saving injured puppy](#)

Miami Herald, The (FL)

December 19, 2008  
Section: Metro & State  
Edition: Final  
Page: 1B

KIND KIDS HONORED

BY BREANNE GILPATRICK bgilpatrick@MiamiHerald.com

The students say they didn't think they were doing anything special.

But a local animal organization called them heroes, and honored them Thursday for saving a puppy that was shoved down a sewer grate earlier this year in Miami.

Humane Educators Reaching Out, a humane education organization, presented awards to seven Miami Dade students at ceremonies Thursday at Lenora Braynon Smith Elementary School and the adjacent Allapattah Middle School.

The students Jakara Viel, 8; Ladena Parks, 9; Rantrell Johnson, 12; and Janika Viel, Paulemy Senat, Dominique Lowe, and Julian Brown, all 13 had been out playing when they saw someone trying to stuff Winnie, a German shepherd mix, down a sewer grate.

One of them ran to find the neighborhood's local "dog lady," who crawled into the sewer and retrieved Winnie after another neighbor pried off a nearby manhole cover.

One of the dog's rear legs was badly broken, and had to be amputated. But those honoring the children said their efforts probably saved Winnie's life.

"When children show bravery and determination to help another being, they should be honored," said Susan Hargreaves, founder of Humane Educators Reaching Out. "Not that they need recognition, because they feel they were just doing what seemed like their only option. But it's such a positive act that it needs to be recognized."

Photo Byline ANGEL VALENTIN/FOR THE MIAMI HERALD WINNIE AND HER HEROES: Animal advocate Susan Hargreaves, center, visits Allapattah Middle School to recognize children who helped rescue this dog. From left are Paulemy Senat, 13, Rantrel Johnson, 12, Dominique Lowe, 13, and Janika Viel, 13.

Original link: <http://www.miamiherald.com/news/miami-dade/story/819027.html>



# HAPPY NEW YEAR!



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# The Jupiter Courier

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Sunday, January 2, 2011

50 cents

## STEVE WEAGLE'S FORECAST for North County

Highs will be in the upper 70s and even low 80s in spots. The chance for an isolated shower or two will remain in the forecast, but rain chances are very slim.



Steve Weagle is  
chief meteorologist  
for WPTV Channel 5.  
He can be reached  
by e-mail at:

swweagle@scripps.com

## EXTENDED FORECAST



Data from weather station  
operated by the  
Loxahatchee River  
Historical Society

## Ricky Williams honors Animal Hero Kids

By Patti Roth  
YourNews Contributor

Two dozen youngsters and teenagers from Florida and elsewhere in the nation were honored as National Animal Hero Kids recently, and relished the opportunity to hang out with a famous football player.

The vegetarian luncheon event in Delray Beach focused the spotlight on the award-winning youngsters and their varied efforts to assist animals.

Among the group were teens from an Okeechobee facility who are socializing and training Mirzi and other homeless shelter dogs for adoption.

Animal Hero Kids awards are presented by Humane Educators Reaching Out, an organization established by Jupiter Farms resident Susan Hargreaves to promote kindness and respect for all species.

Some of the Animal Hero Kids received scholarship prizes provided by a supporter who requested to be anonymous. The scholarship



PATTI ROTH/TEP/ALM.COM/YOURNEWS

Miami Dolphins football player Ricky Williams and Susan Hargreaves, center, of Jupiter Farms stand with some of the National Animal Hero Kids at an awards program in Delray Beach.

money totaled \$8,000.

During the event, Miami Dolphins football player Ricky Williams offered to match the scholarship prizes via his foundation. He also signed autographs and posed for pictures with the animal hero kids.

The award winners included:

- A group of kids from Miami who assisted in rescuing Winnie, an abused puppy that was stuffed into a storm drain;
- Urban Tails, an organization that works with teens in the ju-

venile justice system to train and socialize homeless dogs for adoption;

- A Fort Lauderdale girl who redirected sea turtle hatchlings toward the ocean instead of the busy highway;

- A boy from Washington working to free Lolita, a captive performing Orca.

- A teenage vegetarian chef
- Girls from Florida and Kentucky who urged officials to ban fox penning, a practice of allowing dogs to chase and sometimes rip apart foxes and coyotes.

Hargreaves regards humane education and recognizing acts of compassion as a valuable approach to preventing violence.

"The recognition of children's compassionate, brave acts is a powerful tool against bullying, apathy and plain old 'meanness,'" Hargreaves stated.

More information is available at [humaneeducatorsreachingout.com/heroawards.htm](http://humaneeducatorsreachingout.com/heroawards.htm)





KIT BRADSHAW • kit.bradshaw@scripps.com

Susan Hargreaves holds Lovey next to the truck that she has for her humane efforts. It features a photo of Lovey and other animals on the sides and back.

## Jupiter Farms resident helps children learn to be kind to animals

BY KIT BRADSHAW  
kit.bradshaw@scripps.com

It took childhood experiences — from horrendous conditions at a poultry farm where her aunt worked, or seeing her pet dog abandoned by her mother and abused by new owners — to solidify Susan Hargreaves' resolve to teach children to love and care for animals.

Luckily, she had an example from a true animal lover, her grandfather, who rescued wildlife, rehabilitated the animals and returned them to their habitat, to see how a caring person takes care of the animal world.

The Jupiter Farms resident learned her lessons, and now teaches them to children throughout Florida as part of her project of KidsHelpAnimals.com.

She has established annual awards for children who have

shown extraordinary kindness to animals, such as the youngsters in Liberty City who rescued a puppy stuffed into a drainage ditch and left to die, who received the award last year.

Now, there is a new opportunity for youngsters to be more aware of the importance of caring for all animals. Though an anonymous donation, Hargreaves will award a \$5,000 college scholarship to a child who exemplifies humane treatment toward animals.

She is collecting applications and information on possible candidates for this scholarship until the end of the year.

"This scholarship will be presented to one of the Extraordinary Animal Hero Award children or youth recipients, through the National Animal Hero Kids.com program. In my 27 years of

teaching humane education program to foster compassion toward others, I've never had an opportunity like this, and I'm thrilled to be able to offer this scholarship," Hargreaves said.

In those 27 years, Hargreaves has spread the message of compassion toward animals, both in the United States and in Canada and as the director of education for Caring Fields Animal Sanctuary in Palm City, an affiliate of the Pegasus Foundation. "My mission is to foster compassion for all animals, from the domestic to wildlife to farm animals, and those that are used for our entertainment.

"I do this by going to schools, day care centers, groups, and having the children participate in interactive dramatizations, where the students dress up like the animals,

so they can put themselves in the animal's place."

Hargreaves said this education fosters compassion and empathy in children that will stay with them all their lives. "These are the building blocks of being kind to animals and to others."

Hargreaves said her program takes her into local classrooms as well as throughout the state. "I go where people ask me to go, and I've never said no when it comes to humane education," she said.

For information about Hargreaves' programs and the college scholarship, call (561) 676-0633 or e-mail Kind2all@bellsouth.net. More information is available at [www.humaneeducatorsreachingout.com](http://www.humaneeducatorsreachingout.com).

For a longer version of this story, visit [TCPalm.com](http://TCPalm.com).



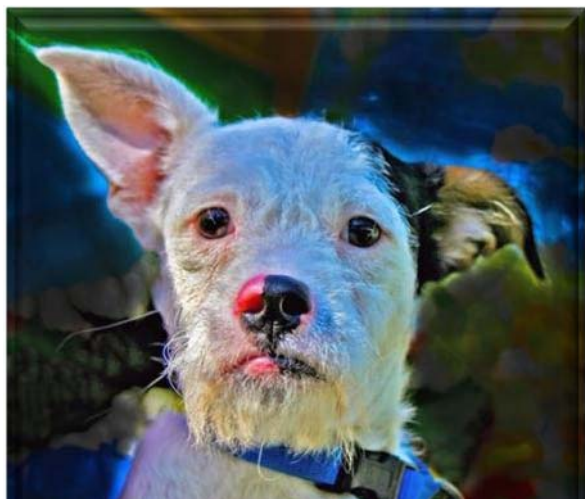
# ***Pet-a-Palooza & Adopt-a-thon***

**Saturday, October 23<sup>rd</sup>, 2010**

**10 am – 2pm**

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Every Animal Rescue in Martin and St. Lucie Counties will be there ... will you?**



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## **Be Kind to All Animals** **Poster Contest**

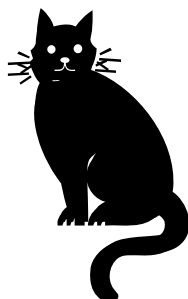
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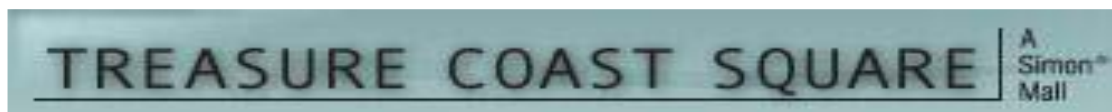
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- Hobe Sound Animal Protection League
- Dogs and Cats Forever
- Humane Society of the Treasure Coast
- All Pet Rescue



- Humane Society of St. Lucie County
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- Animal Birth Control
- Domino's House
- Animal Rescue Foundation

**For more information call 561-575-5517.**

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## Stuart grade-school students urged to become 'animal heroes'

By Kim Hughes

Wednesday, September 29, 2010

STUART — If you saw a tall black-and-white cat prowling the halls of J.D. Parker Elementary School on Wednesday, you weren't hallucinating. The costumed character — Kitty T Cat — was part of Susan Hargreaves' presentation to students on humane education.

Hargreaves, director of education at Pegasus Caring Fields Education Center in Palm City and executive director of the National Animal Hero Program, was at the school making multiple presentations to various age groups about having compassion and respect for animals.

Kitty T Cat — portrayed by fourth-grader Devyn Edwards — helped Hargreaves share her message.

With more than 30 years of experience as a humane educator, Hargreaves said her goal is "to promote kindness to animals and let children know how they can be heroes to animals."

Betsy Gunderson, a fourth-grade teacher at the school, was thrilled to be able to share Hargreaves with her students. An animal lover herself, Gunderson initially called Hargreaves to get specifics about the "Be Kind to All Animals" poster contest.

When Hargreaves mentioned to Gunderson that she offers free educational presentations, an immediate invitation was issued.

"Every child in the world should learn about animal compassion," Gunderson said.

Using a slide show, Hargreaves shared stories of animals that have been rescued by "animal heroes," many of them kids. She detailed what life was like for these animals before those "heroes" stepped in and how far they had come since being rescued.

Explaining the importance of spaying and neutering animals, Hargreaves offered this statistic to get the students thinking: Cats are the No. 1 abandoned animal in the United States.

Of dogs, she said, "If I could put eight dogs in every home in the U.S., do you know there still wouldn't be enough homes for the dogs that exist right now?"

Hargreaves discussed ways in which the students can become "animal heroes," including participating in the poster contest and attending an upcoming "Adopt-A-Thon"

at Treasure Coast Square Mall on Oct. 23.

Gunderson's students were eager to share stories about animals they had rescued from bad situations and about their own pets. All were enthusiastic about getting started on their posters for the contest.

Hargreaves inspired them by saying, "Close your eyes for a second and try to picture what you're going to draw if you were going to have to give a message to someone to be kind to all animals."

#### How You Can Get Involved

Animal lovers of all ages (including adults) can enter the "Be Kind to All Animals" poster contest by artistically encouraging others to show compassion to all species of animals. Submissions can be dropped off at or mailed to any Martin County Library System branch before Oct. 20. Prizes will be awarded and the top 10 posters will be displayed at Blake Library in Stuart Nov. 8-15.

Attend the Pet-a-Palooza and Adopt-a-thon at Treasure Coast Square Mall in Jensen Beach on Oct. 23 from 10 a.m. to 2 p.m. Participating groups include: Treasure Coast Spay/Neuter Alliance; Hobe Sound Animal Protection League; Dogs and Cats Forever; Humane Society of the Treasure Coast; All Pet Rescue; Humane Society of St. Lucie County; Animal Birth Control; United for Animals; Domino's House; and Animal Rescue Foundation.

If you're interested in learning more about the events above or in having a free educational presentation, organizing a field trip to Caring Fields Education Center or getting a free DVD titled "Be an Animal Hero, call 561-575-5517. You can also visit [www.kidshelpanimals.com](http://www.kidshelpanimals.com).



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pledge to be kind to the other animals  
and to the earth.  
I will never harm an animal.  
I promise to help any animal in danger.  
I realize that wild animals need to stay with  
their families in their natural homes.  
I will be kind to this earth by recycling,  
and never littering.  
I will never ignore an animal in need.  
I will be part of the solution for homeless  
animals and promise to adopt not shop.

**Caring Fields Animal Sanctuary Education Center**  
An affiliate of The Pegasus Foundation  
[www.caringfields.org](http://www.caringfields.org)



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animals and promise to adopt not shop.

**Caring Fields Animal Sanctuary Education Center**  
An affiliate of The Pegasus Foundation  
[www.caringfields.org](http://www.caringfields.org)



pledge to be kind to the other animals  
and to the earth.  
I will never harm an animal.  
I promise to help any animal in danger.  
I realize that wild animals need to stay with  
their families in their natural homes.  
I will be kind to this earth by recycling,  
and never littering.  
I will never ignore an animal in need.  
I will be part of the solution for homeless  
animals and promise to adopt not shop.

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**Education Center - Book a free program, call 772-219-8311**  
BRAF-Horse Rescue and Adoption..... 561-622-6539  
HSAPL-Cat Rescue..... 772-463-9546  
PPAW -Help for injured, orphaned wildlife..... 561-793-2473  
Safe Harbor for Cats & Dogs..... 561-747-1598  
Busch Wildlife Sanctuary..... 561-575-3399  
Peggy Adams Animal Rescue..... 561-686-3663  
Maine Life Center-Help for Sea Turtles..... 561-627-8280  
PRC Animal Care and Control..... 561-233-1200  
Humane Society of the Treasure Coast..... 772-223-8822  
Dogs & Cats Forever..... 772-485-4458  
Humane Society of St. Lucie County..... 772-461-0687

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