

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF NORFOLK

WILBER ZARATE LLAVEN, individually and)
as next friend of Cynthia Isabel Zarate)
Tovilla,)

Plaintiffs,)

v.)

PEOPLE FOR THE ETHICAL)
TREATMENT OF ANIMALS, INC.,)
Serve: Ingrid E. Newkirk)
Registered Agent)
501 Front Street)
Norfolk, Virginia 23510)

and)

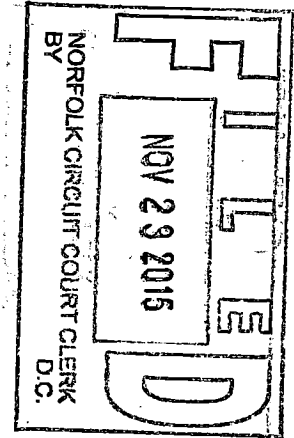
VICTORIA J. CAREY,)

and)

JENNIFER L. WOOD,)

Defendants.)

Case No.: CL15-11874



COMPLAINT

NOW COMES, Wilber Zarate Llaven (“Wilber”), individually and as the next friend of Cynthia Isabel Zarate Tovilla (“Cynthia”), by counsel, and for his Complaint against the defendants People for the Ethical Treatment of Animals, Inc. (“PETA”), Victoria J. Carey (“Carey”), and Jennifer L. Wood (“Wood”), states as follows:

1. Wilber is a resident of Accomack County, Virginia.
2. Wilber is the father of Cynthia who is a child under the age of eighteen and who lives with her father.

3. PETA is a corporation organized under the laws of the Commonwealth of Virginia and has its principal place of business in the City of Norfolk, Virginia.
4. For Christmas in 2011, Wilber acquired a Chihuahua puppy to give to his daughter, Cynthia.
5. Wilber gave the Chihuahua to Cynthia for Christmas, and the family named the dog Maya.
6. As the family dog, Maya became an important part of the family who was loved by all members of Wilber's family, and was especially adored by Cynthia.
7. Cynthia was constantly playing with Maya, and after school, Cynthia would go straight home to play with her Maya.
8. Maya, a Chihuahua, was a very small dog who was afraid of strangers and larger dogs.
9. After getting Maya, Wilber on more than one occasion took Maya to a veterinarian clinic, where among other things, Maya received her annual vaccinations.
10. Wilber and his family subsequently moved into a trailer park (the "Park"), known as Dreamland 2, located in Accomack County.
11. Wilber had other extended family members living in the Park, two of whom had a dog. However, Maya was the only dog that Wilber's family owned.

12. At one point, the Park primarily consisted of two ethnic or cultural communities. One section was mostly comprised of a Haitian community, and the other was largely Hispanic.
13. Gradually, the Haitian community moved from the Park and some of the departing people left large dogs behind.
14. In 2014, the owner and/or manager of the Park contacted PETA to inquire if PETA would remove the dogs near the Park that had been left behind by former residents.
15. PETA is technically classified as a charitable organization and purportedly advocates for the humane and ethical treatment of animals.
16. However, the public is generally unaware that under the leadership of its founder and chief executive officer, Ingrid Newkirk, PETA detests the concept of domestic animals and pets, and considers pet ownership to be a form of involuntary bondage.
17. Under PETA's philosophy, it is better to kill lost or stray pets than to find them suitable homes.
18. PETA operates a purported animal shelter in Norfolk, Virginia. However, PETA does not use the facility as a true animal shelter. The facility is a front for a slaughter house that kills cats and dogs.
19. Attached as Exhibit A is a blog report from a former employee of PETA outlining some of the unethical lengths to which PETA routinely goes to deceive the public concerning its philosophy and its killing of companion animals.

20. In response to the request of the Park's owner and/or manager, PETA agreed to come to the Park to purportedly try to capture the dogs that were left behind by former residents.
21. At all times relevant, the defendants, Carey and Wood, were agents and representatives of PETA acting within the scope of their employment and agency with PETA.
22. Carey and Wood came to the Park and began to ingratiate themselves with the residents in order to build trust with the residents.
23. They told residents that they would be trying to find good homes for the dogs they captured.
24. They also told residents that PETA would be glad to provide vaccinations for the residents' pets and to have them spayed and neutered.
25. Carey knew that Maya was the Zarates' pet and she often saw Maya with members of Wilber's family.
26. PETA representatives, including Carey, spoke with Wilber about Maya.
27. Carey told Wilber that PETA would be glad to have Maya vaccinated.
28. Wilber agreed, and based on PETA's representation and assurance, Wilber in 2014 waited for PETA to provide Maya with her annual vaccinations as agreed.
29. Despite their representation to Wilber, PETA did not provide Maya with her vaccinations.

30. Although PETA was contacted to address the issue of the dogs that had been left behind in the Park, PETA did not make any effort to capture and relocate those animals.
31. PETA instead took the opportunity to enter the Park to surreptitiously take the residents' pets for the purpose of killing them.
32. PETA believed that given the soci-economic status of the residents, PETA could take the pets and kill them without any repercussion to PETA.
33. On October 18, 2014, PETA, through its agents and representatives, entered the Park to execute its plan to steal pets in the Park for the purpose of killing them.
34. Maya was mostly an inside dog that was normally in the presence of a member of Wilber's family when she was outside.
35. When she was outside and not with Wilber's family, Maya stayed on or near Wilber's porch.
36. While Wilber rented the lot on which his family's mobile home was located, Wilber owned the mobile home and the porch that was attached to the mobile home.
37. On the morning of October 18, 2014, Wilber had gone to the store. Among other things, while at the store, Wilber purchased a pillow for Maya.
38. Upon returning home, Wilber could not find Maya.
39. The Zarate family searched for Maya but could not find her.

40. Wilber's niece told Wilber that her dog was also missing. PETA knew that the niece's dog belonged to the niece. Upon information and belief, PETA stole and killed the niece's dog.
41. Wilber had installed a security camera on his porch to prevent break-ins of his vehicle.
42. PETA representatives, including Carey and Wood, did not realize a security camera existed.
43. The security camera video captured the outrageous actions of the defendants. The video revealed that PETA had first tried to have two children in the neighborhood lure Maya off her porch. PETA had paid the children to lure Maya away.
44. When the children were unsuccessful in luring Maya from the porch, Carey and/or Wood backed the PETA van into Wilber's driveway.
45. With Wood keeping a lookout, Carey went on to Wilber's porch, seized Maya, and loaded Maya into the back of the van. Carey and Wood then drove off with Maya.
46. After viewing the video, Wilber called the PETA animal shelter the same day the defendants took Maya, but no one answered.
47. The next day Wilber had his niece call PETA.
48. The niece spoke with Carey.
49. The niece indicated that Wilber was calling to get Maya back.
50. Not realizing that a video existed of the theft, Carey denied that PETA had taken any dogs that day.

51. The niece replied that PETA most certainly had taken dogs that day, because Wilber had a video showing that PETA had taken Maya.
52. In shock that her actions had been caught on video, Carey immediately hung up.
53. At the time of the conversation, PETA had already killed Maya.
54. Virginia law and regulations require that a shelter obtain the written permission of a pet owner in order to take the owner's pet.
55. PETA never obtained permission from Wilber or anyone in Wilber's family to take Maya.
56. Virginia law and regulations also require that an animal shelter must wait at least five (5) days after receiving a companion animal before euthanizing a companion animal such as Maya.
57. PETA violated the law by euthanizing Maya within 24 hours of taking her.
58. Had PETA waited the five (5) days before killing Maya, Wilber and his family would have had been able to recover Maya alive.
59. On approximately October 21, 2014, Carey and another representative of PETA came to Wilber's house.
60. Carrying a fruit basket, the PETA representatives admitted to Wilber that they had "bad news," and that PETA had euthanized Maya.
61. During the visit, the PETA representatives asked about the video and were visually searching for the camera. It was apparent to Wilber that the real purpose of the visit was for PETA to ascertain the location of the security

camera and to learn the extent to which PETA's illegal actions had been captured on video.

62. In an effort to cover up what they did, PETA falsified and altered documents which they submitted to governmental authorities, which are required to be submitted by law.
63. Upon learning that Maya had been killed, Cynthia became distraught.
64. Cynthia experienced extensive and severe emotional distress. Among other things, she cried for weeks, became lethargic, lost sleep, refrained from eating and lost weight.
65. PETA's actions in taking and killing Maya were intentional, willful and wanton and reckless, and PETA willfully wantonly and recklessly inflicted severe emotional distress on Cynthia.
66. Other members of Wilber's household, including Wilber, experienced emotional pain and suffering.
67. Maya was irreplaceable and unique, and had a special emotional value to Wilber and Cynthia.
68. The actions of the defendants set forth herein were part of an established pattern of PETA, which through its authorized employees, agents, and representatives, routinely kill companion animals in violation of law, regulation and decency.
69. Carey and Wood's actions were authorized, ratified and condoned by PETA's executive management.

COUNT I

(Conversion)

- 70. Wilber realleges and reasserts paragraphs 1 through 69 above.
- 71. The defendants committed conversion when they took Maya and they exercised exclusive domain and control over Maya inconsistent with the rights of her owner(s) by taking and killing her.
- 72. Wilber and Cynthia each had an ownership interest in Maya.
- 73. Wilber and Cynthia sustained damages of \$2,000,000 which were proximately caused by the defendants' actions.

WHEREFORE, Wilber, individually and as next friend to Cynthia, asks for joint and several judgment against the defendants for \$2,000,000 in compensatory damages, plus his costs, pre- and post-judgment interest, as well as \$5,000,000 in punitive damages against PETA, \$350,000 in punitive damages against Carey and Wood and any other relief as the Court deems fit and proper.

COUNT II

**(Conversion, In The Alternative,
If Cynthia Is Found To Be The Sole Legal Owner of Maya)**

- 74. Wilber realleges and reasserts paragraphs 1 through 73 above.
- 75. Cynthia sustained damages of \$2,000,000 which were proximately caused by the defendants' actions.

WHEREFORE, Wilber, individually and as next friend to Cynthia, asks for joint and several judgment against the defendants for \$2,000,000 in compensatory damages, plus his costs, pre- and post-judgment interest, as well as \$5,000,000 in punitive damages against PETA,

\$350,000 in punitive damages against Carey and Wood and any other relief as the Court deems fit and proper.

COUNT III

(Trespass)

76. Wilber realleges and reasserts paragraphs 1 through 75 above.
77. By coming on to Wilber's porch to commit an illegal act, the defendants committed trespass causing Wilber damages of \$2,000,000.

WHEREFORE, Wilber, individually and as next friend to Cynthia, asks for joint and several judgment against the defendants for \$2,000,000 in compensatory damages, plus his costs, pre- and post-judgment interest, as well as \$5,000,000 in punitive damages against PETA, \$350,000 in punitive damages against Carey and Wood and any other relief as the Court deems fit and proper.

COUNT IV

(Intentional and Reckless Infliction of Emotional Distress)

78. Wilber, as next friend of Cynthia, realleges and reasserts paragraphs 1 through 77 above.
79. By taking and killing Maya, the defendants intentionally and/or willfully, wantonly and recklessly inflicted emotional distress on Cynthia which they knew Cynthia would or would likely suffer upon learning of the death of Maya and the outrageous actions of the defendants. The defendants

conduct was outrageous and intolerable in that it offends against the generally accepted standards of decency and morality.

WHEREFORE, Wilber, as next friend of Cynthia, asks for joint and several judgment against the defendants for \$2,000,000 in compensatory damages, plus his costs, pre- and post-judgment interest, as well as \$5,000,000 in punitive damages against PETA, \$350,000 in punitive damages against Carey and Wood and any other relief as the Court deems fit and proper.

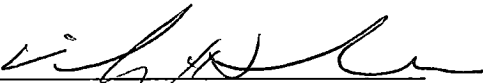
GENERAL AD DAMNUM

TRIAL BY JURY IS DEMANDED.

Respectfully submitted,

WILBER ZARATE LLAVEN

By:


Counsel

William H. Shewmake, Esquire (VSB No. 25429)
John "Jack" M. Robb, III, Esquire (VSB No. 73365)
LeClairRyan, A Professional Corporation
919 East Main Street, Twenty-Fourth Floor
Richmond, Virginia 23219
Telephone: (804) 783-7595
Facsimile: (804) 783-7695
Email: shewmake.william@leclairryan.com
jack.robb@leclairryan.com
Counsel for Plaintiff

mom2nomads

ahhh, the life of a diplomatic princess . . .

09 FEB 2015

520 *Comments*

Rescued by Black Boy: how a neglected dog set me back on my path, away from PETA

There was a time when I was a True Believer and a very good little soldier, I did what I was told to do, when I was told to do it, I didn't question orders and if I did it was never to the face of the one giving them. Then, one stormy and snowy evening, I stopped by an abandoned house to check on a dog I'd been feeding and caring for. I pulled up in front of the home and saw him huddled on the open porch, under cover as much as his short chain would allow, his thick fur encrusted in ice. In that moment I made the decision to unchain him and usher him into my van and, unlike past days when he'd been slightly timid and unwilling to trust me completely, he followed me. I rubbed him with towels to dry his soaked fur, wrapped him in blankets to warm him, fed him dog treats, stroked his head. What followed is one of the great regrets of my life, one I can barely bring myself to write about. Back in a warehouse later that night I held his big head in my lap and whispered soothing mantras in his ear while a colleague of mine injected him with the chemical that would take his life, and he quietly slipped away. I don't regret taking him, he would probably have frozen to death if I'd left him there, I regret being a good soldier, I regret following orders, I regret not listening to my heart, I regret not fighting for Black Boy. That was his name, this dog who'd been kept on a chain for his entire life in the yard of an abandoned house, never given affection, fed barely enough to sustain him. He'd been bought by the son of the woman who lived next door to the abandoned house for "protection." She was terrified of him, she threw his food at him because she wouldn't go near him. At first glance he was intimidating, a big black German Shepard mix who'd only known life on a chain and who was, understandably, protective of his space. But something about him had captured me, I spent time with him, a lot of time, and this is how he came to trust me enough to let me whisk him away on the night that ended up with him dead and me broken.

As a field worker for People for the Ethical Treatment of animals one of my duties was to visit various houses and check on dogs who were kept outside, mostly chained, many without shelter. Some were stuck in the yard for "protection." Some were dogs who had started as cute puppies, needing training that never came, and ended with them chained to a metal stake in a plot of dirt. These dogs led lives of solitude and neglect, often severe neglect. Laws, and enforcement of those laws, were so lacking that very little could be done to help them. If I and my colleagues didn't feed them, they often didn't eat. If we didn't give them houses then they slept in the dirt, exposed to the sun, rain, and snow. If we didn't put straw in those houses they went without bedding. Often, without us, they went without any kind of

companionship but, despite it all, these dogs were social sparks of light, wanting only to love and be loved. The situation was most dire in Portsmouth, Virginia, specifically a neighborhood called Fairwood Homes.

Fairwood Homes was a development full of tiny, decrepit homes that lacked central heat. The houses were originally intended to be temporary but someone had seen dollar signs and purchased the development to turn it into low-income housing. Fairwood Homes became a place full of people who had nowhere else to go. I spent a lot of time there, and the surrounding neighborhoods, getting to know people, educating them on the benefits of spaying and neutering, vaccinating, proper nutrition, and the importance of socialization for dogs. But I had very few resources and not a lot of support from PETA to focus on education, my focus was supposed to be on triage. My time was spread thin as, in addition to working in Portsmouth, I had to answer calls from all over the Hampton Roads area—to help with feral cats, investigate animal cruelty and neglect, answer calls about dog fighting, and provide transportation for our spay/neuter program from homes to local vets and back again. I worked from early in the morning until well past dark, I neglected my marriage and myself but I felt I was doing important work, and I was good at it. My first performance review earned me a raise and accolades from Ingrid Newkirk, the president of PETA and my direct supervisor. I was blind to the already developing cracks in my own seams.

In the beginning, I wanted to adopt out the majority of animals I brought in, and sometimes I neglected to report when I picked up an animal, in doing so, I could bring them to a local shelter because the alternative was euthanasia at PETA. I was not yet a True Believer. Even after I became a True Believer there were certain animals, animals I knew I could easily place, for whom I requested an adoption green light. A few times I was successful in my requests, but I had to fight hard for each adoption and, increasingly, I encountered great resistance. I heard phrases like “a waste of resources” and “not adoptable,” my desire to save each animal was belittled as naive and trivial, I was told that I was missing the bigger picture. I remember one day bringing a tiny white dog into Ingrid’s office to tell her I wanted to adopt her out, not euthanize her. She rolled her eyes and asked why that dog was any more worthy than any of the countless other animals in shelters waiting for a home. I told her she was an adoptable dog—small, social, sweet, could be placed with very little trouble. After sarcastically berating me, with a smile on her face, she turned to a man in her office and asked what he thought, he said she was very cute. She sighed and said something along the lines of “fine, do what you want.” So I found her a home. The perspective I brought to PETA was that of an animal shelter worker. I’d been taught that, as an animal advocate and rescuer, I was duty bound to believe that very few animals were beyond hope and, while we must balance our limited resources, animals who came to us through no fault of their own (meaning, all of them) at least deserved a chance. This was not the philosophy I encountered at PETA, at least not from the leadership.

I was treading water in Fairwood Homes and other areas where I primarily worked. More and more I was euthanizing all the animals I brought in, and I could never bring in enough animals, or work enough hours, to please Ingrid. I worked mainly on my own because there were only a few field workers in total and the need, the amount of calls we received, was overwhelming. Much of the work was dangerous, especially for a woman alone. I have been surrounded by groups of young men who accused me of stealing their pit bulls (I hadn’t), chased in my van through a swamp by hunters because I was documenting the conditions under which their hunting dogs were kept, chased by packs of feral dogs, pinned against a wall by a man who threatened me. I asked Ingrid for a phone that worked properly (my mobile phone was ancient and worked sporadically), and to be allowed to carry mace. She refused both requests. Eric was becoming increasingly concerned about my safety, I reassured him that I was fine, believing in my own bravado. Physically I was fine, emotionally my cracks were spreading.

An equally overworked and emotionally frustrated colleague and I decided we would ask Ingrid if we could open a small shelter near Fairwood Homes, it would operate not only as a shelter but also a place we could vaccinate animals and educate the people in the neighborhood, it would give us a central base. Because, let me be clear, there was no shelter at PETA when I was there. What was referred to as the "shelter" was a large, empty storage closet across from our office. The only other holding facility we had was in the warehouse, where the animals were euthanized. And when I did use the room across from my office as a holding area for animals Ingrid would ask why I hadn't already euthanized them, one time nailing me to the wall because the litter of puppies I'd placed in there for a night had pooped everywhere, I was told to euthanize the puppies immediately. Needless to say, Ingrid refused our request for a shelter—waste of resources, not the aim of the program, animals beyond hope, same old same old. I saw the opening of a shelter as a chance to make a real difference in an area where the animals so desperately needed help. And a lot of the people there were good folks, but they were treating animals the way they'd been raised to treat them, they didn't know a different kind of life for a dog, they needed education and assistance, and the children needed to see empathy, compassion, and responsibility or nothing was going to change. I was gutted. I was also exhausted from the constant uphill battle I was fighting, I was tired of euthanizing animals I wanted to save, I was rapidly burning out.

And on that night, sitting on the cold warehouse floor, holding Black Boy and sobbing into his wet fur I broke, completely cracked open. I realized I had strayed far from my own belief system, and if I continued to walk the road I was on I would become a fanatic out of necessity, because it had to be done in order to survive the life I was living. I sobbed for Black Boy, for the life he could have had if I hadn't lost my way. I was right to steal him, I was wrong to be complicit in his death, and, to this day, a part of me hates myself for that.

I began keeping sane work hours, which didn't go unnoticed by Ingrid. I became a bit of a rogue in the field, no longer following protocol, bringing in fewer animals, skipping calls I felt were only excuses for me to berate someone. One day I took part in a meeting about the "allocation of resources" for our program. Ingrid announced that, in order to cut costs, we would no longer be paying to have male pit bulls neutered, we would only pay to have females spayed. She asked for feedback, which I knew she did not really want but I spoke up anyway. I told her that neutering was a necessity, without it the male dogs would be vulnerable to being used as fighting dogs. She maintained we didn't have the funds for it. I told her that we had to find the funds, we didn't have a choice. No, the decision was made and we would no longer pay for neutering. I took a deep breathe, looked at my friend and colleague who was seated across the table from me who had fixed me with a "don't do it" stare, took a deep breath, and told Ingrid that if we discontinued the neutering program in the particular area where my focus was then we would be as guilty of perpetuating the cruelty of dog fighting as those who were fighting the dogs, and that the suffering and death of each dog lost to a fight would be on our hands. The meeting ended.

A few weeks later I was given a letter of dismissal from the woman who had started out as my assistant but had since become my supervisor, her promotion happened around the time I'd stopped being such a good little soldier. Not cut out for a job in animal rescue, best of luck, effective immediately. I was told to clean out my desk and leave. I was upset, not because I'd been fired because I'd seen that as inevitable, and I was grateful for it. I was upset because, contrary to the excuse they'd invented in order to fire me, I was good at my job, what I was no longer good at was following orders that I knew were immoral. While I was packing my desk two men came into my office to "escort" me out of the building. As I picked up my box of belongings one of them wrapped his fingers around my arm, the subtle threat of force was not lost on me. I responded to his grasp with "don't you fucking touch me" while shooting

him with the same glare that had saved me from gang members and hunters. I left PETA that day, still broken, full of regret, burned out, but solid in the belief that I was back on my path and I needed to make amends.

It has taken me years to write about my experiences at PETA, the closest I ever came was [this blog \(https://mom2nomads.wordpress.com/2013/07/08/speaking-out-about-peta-and-why-no-animal-is-beyond-help/\)](https://mom2nomads.wordpress.com/2013/07/08/speaking-out-about-peta-and-why-no-animal-is-beyond-help/), where I addressed some of what I'm writing about now but in far less detail. Part of me needs this catharsis, but what made me finally decide to write about this was the [bill that just passed in the Virginia Senate \(http://www.huffingtonpost.com/douglas-anthony-cooper/virginia-senate-bill-peta_b_6615138.html\)](http://www.huffingtonpost.com/douglas-anthony-cooper/virginia-senate-bill-peta_b_6615138.html) and is on its way to the House. Yesterday was the first I'd heard of the bill but I'm glad I did because I think it's a necessary one. The bill would prevent PETA from killing the majority of the animals it brings in, which would be a very good thing because, unless things have changed drastically at PETA since my time there, [and I doubt they have \(http://www.theatlantic.com/health/archive/2012/03/petas-terrible-horrible-no-good-very-bad-history-of-killing-animals/254130/\)](http://www.theatlantic.com/health/archive/2012/03/petas-terrible-horrible-no-good-very-bad-history-of-killing-animals/254130/), they are responsible for the deaths of far more animals than they are disclosing, and they have no problem lying about numbers. And, while I'm hopeful that this bill would make a difference, I am also skeptical at how effective it would be *because* I know from first hand experience that the PETA leadership has no problem lying. I was told regularly to not enter animals into the log, or to euthanize off site in order to prevent animals from even entering the building. I was told regularly to greatly overestimate the weight of animals whose euthanasia we recorded in order to account for what would have otherwise been missing "blue juice" (the chemical used to euthanize), because that allowed us to euthanize animals off the books. I was told regularly to say whatever I had to say in order to get people to surrender animals to me, lying was not only acceptable, it was encouraged. I am not a PETA hater, I agree with many of the things they fight for, even if I think their methods often detract from their objectives. My own feeling is that PETA should be completely barred from taking animals into its facility, and from legally obtaining the drugs needed to euthanize— that is the only way to minimize the killing. I believe they should be allowed to continue to work in the field, out in the open, but that anything behind closed doors is dangerous.

My intention in writing this is not to be vindictive, or to lash out, or to absolve myself from responsibility. I was an adult when I worked there, I made the decision to follow orders, nobody forced me into it. I eventually allowed myself to buy into what I was being sold, the belief that the numbers were so overwhelming that euthanasia was the only option for the vast majority of animals we brought in, the belief that the animals were too broken to be helped, and the belief that it was okay to lie and create stories in order to get the work done. It wasn't okay, the ends did not justify the means, the ends weren't even the ends we should have been working towards. As strange as it feels to believe it, because I worked constantly, the philosophy that I operated under at PETA, the philosophy that I believe they still operate under, was lazy, and it betrayed the animals we were supposed to be helping.

I know that euthanasia, at this point, is a necessary evil but the solution that PETA has decided upon, the killing of the vast majority of the animals it takes in, not to mention the killing of animals whose existence is never recorded, is not the answer. And I really would encourage anyone who is wanting to donate to animals to look at organizations other than PETA. There are so many who are doing remarkable, peaceful work, and they do it with a much smaller budget. PETA, at least in the way it involves itself with companion animals locally, is not what it seems and my belief is that it never will be. I maintain what I wrote in my previous blog about PETA; working with animals who have been neglected, abused, betrayed, given up on, isn't about bailing water out of a sinking ship, it's about finding solutions, educating, building relationships, and fighting *for* animals. It's about saving animals, first and foremost, and that is not done by killing the *vast* majority that you take in. The work of animal

rescue, while exhausting and emotionally difficult, is a privilege. It is a privilege to work on behalf of the voiceless, on behalf of animals who want nothing more than to be a part of a family, to be near us, to spend their days with us, to give us unconditional love. Contrary to what PETA maintains (<http://www.nytimes.com/2013/07/07/us/peta-finds-itself-on-receiving-end-of-others-anger.html?pagewanted=2&r=1&hp&>), the majority of animals it takes in are not beyond hope, in my experience many would be considered highly adoptable by a shelter, the “better off dead” line is one that is dragged out in order to excuse what they do—and it’s a lie.

This is the most difficult blog entry I’ve ever written, even in this moment I’m not sure I’ll press the “publish” button. And I’m pretty sure I’ll never be able to forgive myself for allowing myself to stray so far from the things that I know are right. So I guess I’m kind of looking at this as another way to make amends, especially to Black Boy who, in a very real way, saved me. I’d spent many hours over the course of months with him, it took a long time for him to trust me because he’d only ever known cruelty and neglect. In the end what I did is something unforgivable, I allowed myself to walk a path that I knew in my heart was wrong, I should have fought harder for him, I shouldn’t have followed orders and protocol and all the other shit I’d swallowed hook line and sinker. And all the shit I willingly drank down, and what it led me to do, is something I’ll never be able to cleanse myself of. That’s just a fact. But I hope by writing this, and by writing the truth about what I experienced at PETA, at least some people will open their eyes to what really happens behind its closed doors.

Posted in PETA, Pets and tagged Ingrid Newkirk, People for the Ethical Treatment of Animals, PETA, PETA euthanized

[← Older Entry \(https://mom2nomads.wordpress.com/2015/01/21/994/\)](https://mom2nomads.wordpress.com/2015/01/21/994/)

[Newer Entry → \(https://mom2nomads.wordpress.com/2015/02/11/the-legacy-of-black-boy/\)](https://mom2nomads.wordpress.com/2015/02/11/the-legacy-of-black-boy/)

520 thoughts on “Rescued by Black Boy: how a neglected dog set me back on my path, away from PETA”



my1simplelife on February 9, 2015 at 10.05 said:

Thank you for writing this and for your honesty.

[Reply ↓ \(https://mom2nomads.wordpress.com/2015/02/09/rescued-by-black-boy-how-a-neglected-dog-set-me-back-on-my-path-away-from-peta/?replytocom=373#respond\)](https://mom2nomads.wordpress.com/2015/02/09/rescued-by-black-boy-how-a-neglected-dog-set-me-back-on-my-path-away-from-peta/?replytocom=373#respond)



mom2nomads on February 10, 2015 at 10.05 said:

Thank you for reading it.

[Reply ↓ \(https://mom2nomads.wordpress.com/2015/02/09/rescued-by-black-boy-how-a-neglected-dog-set-me-back-on-my-path-away-from-peta/?replytocom=432#respond\)](https://mom2nomads.wordpress.com/2015/02/09/rescued-by-black-boy-how-a-neglected-dog-set-me-back-on-my-path-away-from-peta/?replytocom=432#respond)



KATHY LETHCOE on February 10, 2015 at 10.05 said:

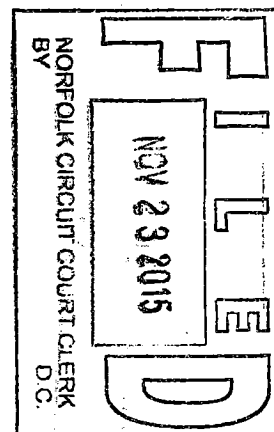
THANKS FOR YOUR STORY AND MOST OF ALL YOUR HONESTY! I THINK IT'S VERY SAD WHEN I HEAR THE THE HORROR STORIES POOR ANIMALS GO THREW AT THE HANDS OF CRUEL DUMB ASS PEOPLE WHO ARE HEARTLESS! I LOVE ANIMALS, I WOULD RATHER BE AROUND A ROOM OF CATS AND DOGS THAN PEOPLE.

LR
LECLAIRRYAN

November 20, 2015

Via Federal Express

George E. Schaefer, Clerk
Circuit Court of the
City of Norfolk
150 St. Paul's Boulevard
Norfolk, VA 23510-2773



RE: Wilber Zarate Llaven, individually and as next Friend of Cynthia Isabel Zarate Tovilla v. People for the Ethical Treatment of Animals, Inc., et al.
Case No.: TBD

Dear Mr. Schaefer:

I have enclosed the following:

1. Civil Cover Sheet;
2. Check in the amount of \$354.00 representing the Court's filing fees; and
3. An original Complaint that I ask you file along with two additional copies of the Complaint.

At this time, we would ask that you only prepare a summons for People for the defendant, Ethical Treatment of Animals, Inc. ("PETA") as we will be serving the two additional defendants at a later date. I would appreciate your date stamping the extra copy of the Complaint and returning it to me in the enclosed pre-addressed, stamped envelope for my files.

Please call my assistant, Nancy Bruce, (804) 783-7500, when the Summons and Complaint are ready for pick up for service on PETA. We will have Hester Services, Inc. pick the summons up for service.

*SVC prepared
11/24/15
Bm*

E-mail: william.shewmake@leclairryan.com
Direct Phone: 804.783.7595
Direct Fax: 804.783.7695


919 East Main Street, Twenty-Fourth Floor
Richmond, Virginia 23219
Phone: 804.783.2003 \ Fax: 804.783.2294

CALIFORNIA \ COLORADO \ CONNECTICUT \ GEORGIA \ MARYLAND \ MASSACHUSETTS \ MICHIGAN \ NEVADA \ NEW JERSEY \ NEW YORK \ PENNSYLVANIA \ TEXAS \ VIRGINIA \ WASHINGTON, D.C.

George E. Schaefer, Clerk
November 20, 2015
Page 2

Thank you for your assistance. Please do not hesitate to call me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'W. H. Shewmake', with a long horizontal flourish extending to the right.

William H. Shewmake

WHS:nab
Enclosures

COVER SHEET FOR FILING CIVIL ACTIONS
COMMONWEALTH OF VIRGINIA

Case No. _____
(CLERK'S OFFICE USE ONLY)

City of Norfolk

Circuit Court

Wilber Zarate Llaven, individually and as next friend of *v./In re:* People For The Ethical Treatment Of Animals, Inc.
PLAINTIFF(S) DEFENDANT(S)

Cynthia Isabel Zarate Tovilla

I, the undersigned plaintiff defendant attorney for plaintiff defendant hereby notify the Clerk of Court that I am filing the following civil action. (Please indicate by checking box that most closely identifies the claim being asserted or relief sought.)

GENERAL CIVIL

Subsequent Actions

- Claim Impleading Third Party Defendant
- Monetary Damages
- No Monetary Damages
- Counterclaim
- Monetary Damages
- No Monetary Damages
- Cross Claim
- Interpleader
- Reinstatement (other than divorce or driving privileges)
- Removal of Case to Federal Court

Business & Contract

- Attachment
- Confessed Judgment
- Contract Action
- Contract Specific Performance
- Detinue
- Garnishment

Property

- Annexation
- Condemnation
- Ejectment
- Encumber/Sell Real Estate
- Enforce Vendor's Lien
- Escheatment
- Establish Boundaries
- Landlord/Tenant
- Unlawful Detainer
- Mechanics Lien
- Partition
- Quiet Title
- Termination of Mineral Rights

Tort

- Asbestos Litigation
- Compromise Settlement
- Intentional Tort
- Medical Malpractice
- Motor Vehicle Tort
- Product Liability
- Wrongful Death
- Other General Tort Liability

ADMINISTRATIVE LAW

- Appeal/Judicial Review of Decision of (select one)
 - ABC Board
 - Board of Zoning
 - Compensation Board
 - DMV License Suspension
 - Employee Grievance Decision
 - Employment Commission
 - Local Government
 - Marine Resources Commission
 - School Board
 - Voter Registration
 - Other Administrative Appeal

DOMESTIC/FAMILY

- Adoption
 - Adoption - Foreign
- Adult Protection
- Annulment
 - Annulment - Counterclaim/Responsive Pleading
- Child Abuse and Neglect - Unfounded Complaint
- Civil Contempt
- Divorce (select one)
 - Complaint - Contested*
 - Complaint - Uncontested*
 - Counterclaim/Responsive Pleading
 - Reinstatement - Custody/Visitation/Support/Equitable Distribution
- Separate Maintenance
 - Separate Maintenance Counterclaim

WRITS

- Certiorari
- Habeas Corpus
- Mandamus
- Prohibition
- Quo Warranto

PROBATE/WILLS AND TRUSTS

- Accounting
- Aid and Guidance
- Appointment (select one)
 - Guardian/Conservator
 - Standby Guardian/Conservator
 - Custodian/Successor Custodian (UTMA)
- Trust (select one)
 - Impress/Declare
 - Reformation
- Will (select one)
 - Construe
 - Contested

MISCELLANEOUS

- Appointment (select one)
 - Church Trustee
 - Conservator of Peace
 - Marriage Celebrant
- Bond Forfeiture Appeal
- Declaratory Judgment
- Declare Death
- Driving Privileges (select one)
 - Reinstatement pursuant to § 46.2-427
 - Restoration - Habitual Offender or 3rd Offense
- Expungement
- Firearms Rights - Restoration
- Forfeiture of U.S. Currency
- Freedom of Information
- Injunction
- Interdiction
- Interrogatory
- Judgment Lien-Bill to Enforce
- Law Enforcement/Public Official Petition
- Name Change
- Referendum Elections
- Sever Order
- Taxes (select one)
 - Correct Erroneous State/Local
 - Delinquent
 - Vehicle Confiscation
 - Voting Rights - Restoration
 - Other (please specify)

Damages in the amount of \$ 91,700,000.00 are claimed.

November 20, 2015

DATE

PLAINTIFF DEFENDANT ATTORNEY FOR PLAINTIFF DEFENDANT

William H. Shewmake, Esquire

PRINT NAME

LeClairRyan, A Professional Corporation, 919 East Main Street
ADDRESS/TELEPHONE NUMBER OF SIGNATOR

Twenty-Fourth Floor, Richmond, Virginia 23219 (804) 783-7595

william.shewmake@leclairryan.com

EMAIL ADDRESS OF SIGNATOR (OPTIONAL)

*"Contested" divorce means any of the following matters are in dispute: grounds of divorce, spousal support and maintenance, child custody and/or visitation, child support, property distribution or debt allocation. An "Uncontested" divorce is filed on no fault grounds and none of the above issues are in dispute.

