

RETURN DATE: APRIL 6, 2021		
STATE OF CONNECTICUT <i>EX REL</i> ,	:	SUPERIOR COURT
JEREMIAH DUNN,	:	
CHIEF STATE ANIMAL CONTROL OFFICER	:	JUDICIAL DISTRICT
	:	OF HARTFORD
	:	AT HARTFORD
	:	
v.	:	
SIXTY-FIVE GOATS	:	
AND NANCY BURTON (OWNER)	:	MARCH 18, 2021

**VERIFIED PETITION**

**COUNT I: CONN. GEN. STAT. § 22-329a**  
**AS TO CUSTODY OF SIXTY-FIVE GOATS OWNED BY NANCY BURTON**

1. Plaintiff is the State of Connecticut (hereinafter “Plaintiff”) *ex rel*, Jeremiah Dunn, Chief State Animal Control Officer.
2. Pursuant to Conn. Gen. Stat. § 22-329a(b), the Chief State Animal Control Officer may lawfully take physical custody of an animal upon issuance of a warrant finding probable cause that such animal is neglected or is cruelly treated, in violation of Conn. Gen. Stat. § 53-247.
3. On or about March 9, 2021, Plaintiff obtained a search and seizure warrant, as part of its investigation, for 147 Cross Highway, Redding, CT. (Exhibit 1).
4. On or about March 10, 2021, said search and seizure warrant was executed and sixty-five (65) live goats<sup>1</sup> and one dead goat were seized as part of the investigation.
5. Upon information and belief, Defendant, Nancy Burton is the owner of the sixty-five (65) goats in Plaintiff’s custody.
6. The Plaintiff has physical custody of sixty-five (65) goats and now seeks to obtain temporary custody and permanent ownership of said animals, pursuant to the procedures outlined in Conn. Gen. Stat. § 22-329a(c).

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<sup>1</sup> A number of does are currently pregnant. The exact number of pregnant does is currently unknown but the total number of goats in Plaintiff’s custody is expected to increase as they give birth.

7. Upon information and belief, Ms. Burton is the owner of the property at 147 Cross Highway, Redding, CT.
8. The Redding Police Department has received at least one hundred and twenty (120) complaints since 2007, mostly related to roaming goats and violations of town ordinances, related to the goats at 147 Cross Highway, Redding, CT.
9. On April 20, 2020, the Redding Police Department investigated a motor vehicle accident after one of Ms. Burton's goats was in the road and was struck by a car.
10. That motor vehicle accident resulted in Ms. Burton being arrested and charged with Animal Cruelty.<sup>2</sup>
11. The Connecticut Department of Agriculture has also received at least five complaints since 2007, mostly related to the overall condition of the goats and the lack of care they were being given.
12. On or about October 7, 2020, a complaint was received by the State Animal Control Unit regarding injured and/or neglected goats at 147 Cross Highway, Redding, CT.
13. On October 15, 2020, State Animal Control Officer (SACO) Barbara Godejohn, accompanied by Redding Police Detective Chistina Dias, observed at least fifty (50) goats on the property and noted that one goat, in particular, was walking on its knees and appeared unable to stand.
14. On October 20, 2020, SACO Godejohn and Officer Dias made contact with Ms. Burton and inquired about the condition of the goats. Ms. Burton alleged that the previously observed goat was not walking on its knees, that she did have an older goat that had been limping for some

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<sup>2</sup> This criminal animal cruelty case is ongoing in the Danbury Superior Court, Criminal Division.

time and that she was too busy to have a veterinarian come out to examine the goats. She did allege that she had an appointment with the veterinarian coming up on November 5, 2020.

15. On November 9, 2020, SACO Godejohn confirmed with the Salmon Brook Veterinary Hospital that Ms. Burton had two of her goats brought in for examination.

16. On December 10, 2020, SACO Charles A. DellaRocco visited Ms. Burton's home to inventory the goats to assist Ms. Burton's efforts to reduce the herd size and find a suitable rescue.<sup>3</sup>

17. On that visit, SACO DellaRocco observed thirty-five (35) to forty-five (45) goats. One of the goats was unable to place her right hind leg down and was visibly limping.

18. On February 3, 2021, SACO DellaRocco went to a nearby location to observe the condition and care of the goats at 147 Cross Highway, Redding, CT.

19. On February 3, 2021, SACO DellaRocco observed Ms. Burton provide two flakes<sup>4</sup> of hay into a goat paddock that contained approximately 10 goats.

20. On February 23, 2021, based on the observations of February 3, 2021, the Department decided to plan a twenty-four (24) hour surveillance operation at 147 Cross Highway, Redding, CT.

21. On March 1, 2021, the State Animal Control Unit and the Redding Police Department commenced a four-day joint surveillance operation to observe the conditions and care of the goats at 147 Cross Highway, Redding, CT.

22. The surveillance operation revealed a number of animal health and property management concerns.

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<sup>3</sup> In early December, Ms. Burton had previously represented to SACO DellaRocco that she wanted to reduce the size of her herd to nine in order to comply with the applicable town ordinance.

<sup>4</sup> A bale of hay is typically comprised of "flakes" of compressed hay that are formed when they are baled. A flake of hay is typically less than 10% of the entire bale.

23. It was observed that between ten (10) and twelve (12) goats had extremely long hooves that affected their mobility.

24. It was observed that there was inadequate manure management and manure is accumulating in and around the paddocks which results in animals having to take shelter in manure filled enclosures.

25. It was observed that the animals do not have adequate access to fresh water. The water being provided is wholly inadequate for the size of the goat herd. At a minimum, each goat should have access to one half gallon of clean water daily, which would require thirty-two and one half (32.5) gallons of water for a herd of this size each day. The entire herd was consistently being given far less than twenty (20) gallons of fresh water daily.

26. It was observed that the shelter provided in the paddocks did not provide enough space to shelter all of the animals and the shelters did not provide an adequate wind break for high winds and cold weather.

27. The surveillance operation concluded on March 4, 2021.

28. Based on the observations made during the surveillance operation, SACO DellaRocco and SACO Tanya Wescovich sought a search and seizure warrant based on probable cause that the crime of animal cruelty was being committed, pursuant to Conn. Gen. Stat. § 53-247.

29. Said search and seizure warrant was signed on March 9, 2021 by Judge Robert A. D'Andrea.

30. On March 10, 2021, during the execution of the warrant and the seizure of the goats, a number of observations were made by Department of Agriculture staff.

31. During the execution of the warrant, dozens of dead goats, estimated to be between forty (40) and fifty (50), were discovered in multiple locations on the property in various stages of decomposition.

32. In the northeast and northwest corners of the property, a number of dead goats were found in plastic bags, inside trash containers and in totes.

33. More dead goats were located in the northeast corner of the property in a shallow pit that was covered by plywood.

34. In the center of the property, frozen and partially decomposed goats were located in large totes under a tarp.

35. Additional dead goats were located in the center of the property that were in plastic bags on the soil surface or partially buried in a shallow pit in or near a garden.

36. A goat that recently died was found in one of the paddock shelters. The straw around its hooves was displaced and a semi-circle pattern was carved into the ground; indicating that the animal was downed and struggling for a significant amount of time before expiring. Its eyes, lips and other soft tissues had been eaten away by rodents.

37. In total, sixty-five (65) live goats were seized and the aforementioned recently deceased goat was seized as evidence.<sup>5</sup>

38. Of the live goats seized, a number of them were visibly underweight.

39. A number of goats were observed to have fur that was missing, matted and/or caked in mud and manure.

40. Many of the goats had extremely long hooves that were not being maintained and were affecting the mobility of the animals.

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<sup>5</sup> The dead goat has been sent for necropsy to be conducted by the University of Connecticut. The findings of that necropsy are pending.

41. The goats in Plaintiff's custody have undergone an initial evaluation by a qualified veterinarian, are currently being monitored and are receiving medical attention as appropriate.

WHEREFORE, Plaintiff respectfully requests that the Court grant the following relief pursuant to Conn. Gen. Stat. §§ 22-4c(a)(3), 22-328, 22-329, and 22-329a:

1. That the Court issue an order to Ms. Burton to show cause why the court shall not vest in the Connecticut Department of Agriculture the temporary care and custody of the sixty-five goats, pursuant to Conn. Gen. Stat. § 22-329a(d). In the alternative, Plaintiff requests that the Court issue an order vesting in the Connecticut Department of Agriculture the temporary care and custody of the animals that were seized pending an ownership hearing on the petition. Pursuant to Conn. Gen. Stat. § 22-329a(d), a hearing on temporary care and custody shall be held not later than fourteen (14) days after issuance of an order to show cause or an order vesting temporary care and custody to the Department of Agriculture.
2. That upon ordering the animals at issue to the temporary care and custody of the Department of Agriculture, that the Court issue an order requiring Ms. Burton to either relinquish ownership of the animals to the Connecticut Department of Agriculture or post a surety or cash bond with the Connecticut Department of Agriculture in the amount of five hundred dollars (\$500.00) per animal for the reasonable expenses in caring and providing for such animals pursuant to Conn. Gen. Stat. § 22-329a(f).
3. That the Court make a finding pursuant to Conn. Gen. Stat. § 22-329a that the animals at issue were in imminent harm, neglected and/or were cruelly treated in violation of

Conn. Gen. Stat. § 53-247.

4. That the Court vest permanent ownership and custody of the animals at issue with the Connecticut Department of Agriculture pursuant to Conn. Gen. Stat. § 22-329a(g) and if necessary, order the humane destruction of any animal if said animal is so injured or diseased that it should be destroyed.

6. That, pursuant to Conn. Gen. Stat. § 22-329a(h), if the Court finds that the animals at issue are neglected or are cruelly treated, the Court order Ms. Burton to pay the Connecticut Department of Agriculture the expenses incurred in providing proper food, shelter and care to each animal it has taken custody of under subsection (b) of Conn. Gen. Stat. § 22-329a and the expenses incurred in providing temporary care and custody pursuant to an order vesting temporary care and custody, calculated at the rate of fifteen dollars (\$15.00) per goat per day until the date that ownership of these animals are vested in the State and also all veterinary costs and expenses incurred for the welfare of these animals that are not covered in the per diem rate.

7. That the Court order such other and additional relief as is just and equitable to effectuate the purposes of this action.

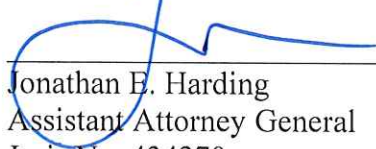
This action is brought by the State of Connecticut and therefore, it is not liable for any costs in this action.

Dated at Hartford, Connecticut this 18th day of March 2021.

PLAINTIFF  
STATE OF CONNECTICUT  
*EX REL*, JEREMIAH DUNN  
CHIEF STATE ANIMAL CONTROL OFFICER

WILLIAM TONG  
ATTORNEY GENERAL

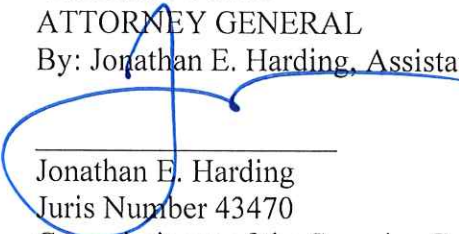
BY:

  
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Hartford, CT 06106  
Tel. (860) 808-5172  
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Pleaser enter the appearance of:

WILLIAM TONG  
ATTORNEY GENERAL

By: Jonathan E. Harding, Assistant Attorney General

  
\_\_\_\_\_  
Jonathan E. Harding  
Juris Number 43470  
Commissioner of the Superior Court



# EXHIBIT 1

AFFIDAVIT AND APPLICATION  
SEARCH AND SEIZURE WARRANT

JD-CR-61 Rev. 3-10  
C.G.S. §§ 54-33a, 54-33c, 54-33j

STATE OF CONNECTICUT  
SUPERIOR COURT

www.jud.ct.gov



Form JD-CR-52 must also be completed

Instructions To Applicant

File the application for the warrant and all affidavits upon which the warrant is based with the clerk of the court for the geographical area within which any person who may be arrested in connection with or subsequent to the execution of the search warrant would be presented, together with the return of the warrant.

Instructions To G.A. Clerk

Upon execution and return of the warrant, affidavits which are the subject of an order dispensing with the requirement of giving a copy to the owner, occupant or person within forty-eight hours shall remain in the custody of the clerk's office in a secure location apart from the remainder of the court file.

Police Case number 2020-360

TO: A Judge of the Superior Court or a Judge Trial Referee

The undersigned, being duly sworn, complains on oath that the undersigned has probable cause to believe that certain property, to wit:

All goats on the property, alive or dead, and to have said animals evaluated and tested for dehydration, emaciation, physical condition, wounds, parasites, injuries and illness by a licensed veterinarian; all animal health and ownership records; photographs of animals; receipts and bills related to animal care and feeding; and medication related to animal care.

- is possessed, controlled, designed or intended for use or which is or has been or may be used as the means of committing the criminal offense of: \_\_\_\_\_
- was stolen or embezzled from: \_\_\_\_\_
- constitutes evidence of the following offense or that a particular person participated in the commission of the offense of:  
C.G.S. 53-247 Animal Cruelty
- is in the possession, custody or control of a journalist or news organization, to wit: \_\_\_\_\_

and such person or organization has committed or is committing the following offense which is related to such property: \_\_\_\_\_

and such property constitutes contraband or an instrumentality of the criminal offense of: \_\_\_\_\_

And is within or upon a certain person, place, or thing, to wit:

The grounds, property, house, garage, trailers, vehicles, paddocks, barns and outbuildings located at 147 Cross Highway, Redding CT. The house is a single family two story federal style structure built in 1850 with faded shingles that appear to be of a mustard color. Land records show that the home is owned by William H Honan and Nancy Burton. The home has approximately 3200 square feet of living space and sits on approximately 3.6 acres of land. There are two driveways, one located on the east side of the home and the other on the west. The west driveway extends to a dilapidated barn that a survey map describes as "Old Barn".

(This is page 1 of a 9 page Affidavit and Application.)

City/Town	Date	Signature and Title of Affiant
DANBURY	MAR 09 2021	
DANBURY	MAR 03 2021	
Jurat	Subscribed and sworn to before me on (Date) MAR 09 2021	Signed (Judge/Judge Trial Referee) 

RETURN FOR AND INVENTORY  
PROPERTY SEIZED ON SEARCH AND SEIZURE WARRANT

Judicial District of			G.A.	At (Address of Court)		Inventory control number
Docket number CR-			Uniform arrest number	Police case number 2020-360	Date of seizure	
					Companion case number	

Then and there by virtue of and pursuant to the authority of the foregoing warrant, I searched the person, place or thing named therein, to wit:

The grounds, property, house, garage, trailers, vehicles, paddocks, barns and outbuildings located at 147 Cross Highway, Redding CT. The house is a single family two story federal style structure built in 1850 with faded shingles that appear to be of a mustard color. Land records show that the home is owned by William H Honan and Nancy Burton. The home has approximately 3200 square feet of living space and sits on approximately 3.6 acres of land. There are two driveways, one located on the east side of the home and the other on the west. The west driveway extends to a dilapidated barn that a survey map describes as "Old Barn".

and found thereon or therein, seized, and now hold in custody, the following property:

Total Cash Seized: \_\_\_\_\_, consisting of

and I gave a copy of such warrant to \_\_\_\_\_, the owner or occupant of the dwelling, structure, motor vehicle or place designated therein, or to \_\_\_\_\_ the person named therein, on (Date) \_\_\_\_\_.

(This is page 9 of a 9 page Affidavit and Application.)

Date	Signed (Officer's signature and department)
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NOTE: Form JD-CR-61, pages 1 - 9 must be supplemented by Form JD-CR-52.

And the facts establishing the grounds for issuing a Search and Seizure Warrant are the following:

1. The undersigned, State Animal Control Officer Charles A. DellaRocco, being duly sworn, does depose and state that he has been a member of the Connecticut Department of Agriculture Animal Control Unit since July 2, 2019. At all times mentioned herein he was acting as a member of said department. The undersigned has also been a sworn Police Officer with Old Saybrook Department of Police Services from November of 1994 to June of 2007 as well as a sworn Police Officer with the Connecticut State Supreme Court Police Department from June of 2007 to July of 2019. The following facts and circumstances are stated from personal knowledge and observations as well as information received from other animal control and police officers acting in their official capacity, official department and police reports, and statements made by prudent and credible witnesses.


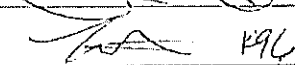
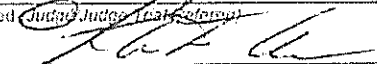
2. The undersigned, State Animal Control Officer Tanya Wescovich, being duly sworn, does depose and state that she is a member of the Connecticut Department of Agriculture Animal Control Unit since January 3, 2020. At all times mentioned herein she was acting as a member of said department. The undersigned has also been a sworn municipal animal control officer for the Town of Stonington from January 10, 2010 to January 2, 2020. The following facts and circumstances are stated from personal knowledge and observations as well as information received from other officers acting in their official capacity, from official department and police reports, and statements made by prudent and credible witnesses.

3. On October 7, 2020, the Connecticut Department of Agriculture State Animal Control Unit received a complaint about injured goats/general care issues on the property located at 147 Cross Highway, Redding. The owner of the property, Nancy Burton, is well known to the Redding Police Department as well as the Connecticut Department of Agriculture State Animal Control Unit because of the many complaints received over the years. The Redding Police Department has at least one hundred and twenty plus (120+) complaints since 2007. The majority of the complaints stem from goats roaming and Burton has been cited numerous times for town ordinance violations. On April 30, 2020, Redding Police Department investigated a motor vehicle accident involving a car vs. goat. The goat sustained injury. As a result of the investigation, Nancy Burton was arrested for Animal Cruelty and the case is still pending in Danbury Superior Court. The Connecticut Department of Agriculture Animal Control Unit has had at least five complaints since 2017 all making reference to the conditions and the large amount of goats on the property.

4. On October 15, 2020, State Animal Control Officer Barbara Godejohn accompanied by Redding Police Detective Christina Dias had noticed at least fifty (50) goats. It was noted that one goat in particular was observed for thirty minutes during which time the goat spent most this time walking on it's front knees. When this goat did stand, Officer Godejohn saw that the goat appeared not to be able to stand on both front feet. Due to the distance, it was difficult to assess the other goats on the property.

5. On October 20, 2020, State Animal Control Officer Barbara Godejohn and Redding Police Detective Dias made contact with the owner of the property, Nancy Burton, who denied that one of her goats was walking on its knees but did mention that she has an older female goat named "Leda" for which she

*(This is page 2 of a 9 page Affidavit and Application.)*

City/Town	Date	Signature and Title of Affiant
DANBURY	MAR 09 2021	 # 7
DANBURY	MAR 09 2021	 # 96
Jurat	Subscribed and sworn to before me on (Date) MAR 09 2021	Signed (Judge/Judge Trial Referee) 

has had to change her feed and give her a pill in an organic apple. She didn't know what the pill was called. Burton told both officers that "Leda" has been limping for some time and that she has not consulted a veterinarian because, "Nature knows more than vets." Burton claimed that she was too busy to get a veterinarian out to examine the goats. In an email sent later in the day to Officer Godejohn, Burton stated she has an appointment on November 5, 2020 with a veterinarian.

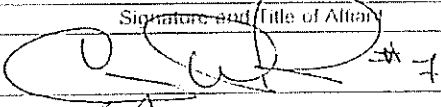
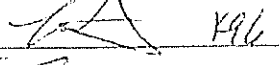
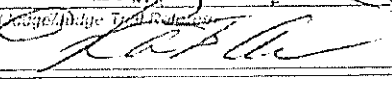
6. On November 9, 2020, State Animal Control Officer Barbara Godejohn confirmed with Salmon Brook Veterinary Hospital the examination of two goats that Burton brought to their practice.

7. In early December of 2020, affiant DellaRocco was assigned to continue with the investigation in this case as well as investigate a complaint made by Burton (Case #2020-424) due to the retirement of State Animal Control Officer Godejohn. On December 10, 2020, affiant DellaRocco made contact with Burton who refused to allow him onto the property so he could inventory the goats in advance of helping her thin her herd. Burton had made reference to wanting to get the herd down to nine goats so she could be in compliance with a town ordinance. During this visit, affiant DellaRocco noticed approximately thirty-five (35) to forty-five (45) goats. Affiant DellaRocco was a distance away from them and noticed one goat was unable to place her right hind leg down and was limping around. The leg was just dangling and when asked about it, Burton stated that it might just be "Leda" who is an older goat of hers.

8. On February 3, 2021, with permission of the owners located at 153 Cross Highway, Redding, utilized an apartment just off the garage to conduct surveillance of the 147 Cross Hwy. Affiant DellaRocco arrived at 0800 hrs. and noticed that it had recently snowed, about an inch or two on top of about a foot. Affiant DellaRocco noticed that Burton's second west end driveway recently had a delivery of hay and feed. It appeared that a delivery truck had pulled up to the fence and thrown the bails of hay and feed over the fence. The hay did have fresh snow on it and it appeared to be a little wet. At 1006 hrs., Affiant DellaRocco noticed Burton pull up in her white car and back down the first east end driveway. At 1025 hrs., Affiant DellaRocco noticed Burton carrying two flakes of hay (a flake of hay is formed by the baler pulling in the dried legume/grass from the row when it's totally dried. Most square bales affiant DellaRocco have seen are between 10-12 flakes per bale) and walk them over to the large paddock that affiant DellaRocco has identified as paddock #1. This paddock houses approximately 10 large goats. Affiant DellaRocco was unable to see any water containers. It took Burton, age 72, quite some time, approximately 10 minutes, to make it to the paddock resting from time to time. Burton threw both flakes of hay into paddock #1 and affiant DellaRocco witnessed the goats become aggressive eating the hay. It took ten minutes for the goats to consume the hay. Affiant DellaRocco noticed that Burton seemed to be a bit more frail than she did in December. Affiant DellaRocco noticed that Burton had taken many breaks and at one time she even cleared off a chair that was along the path where she sat down and rested.

9. On February 23, 2021, due to the observations of February 3, 2021, the department decided that a twenty-four (24) hour surveillance of Nancy Burton's property located at 147 Cross Highway, Redding, CT was going to be conducted started March 1, 2021 for an unspecified time frame. The surveillance was to be a joint operation involving officers from both the Redding Police Department and Connecticut

(This is page 3 of a 9 page Affidavit and Application.)

City/Town	Date	Signature and Title of Affiant
DANDEN	MAR 09 2021	 #7
DANDEN	MAR 03 2021	 #96
Jurat	Subscribed and sworn to before me on (Date) MAR 03 2021	Signed (Judge/Judge Trial Referee) 


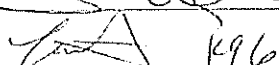
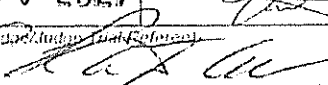
Department of Agriculture Animal Control Unit.

10. On February 26, 2021, both affiants DellaRocco and Wescovich, made contact with Bruce Benedict of Benedict's Home and Garden in Monroe. When asked about Burton, Benedict stated that they deliver approximately sixteen (16) bales of 1st cut Tim/GR hay and sixteen (16) bags of Nutrena CF 16% select stock 50# TXT each week. Benedict supplied both affiants with a printout of purchases made by Burton since December. Benedict stated that Burton writes post dated checks so the dates on the printouts do not match the exact date that the delivery took place. The cost each week is approximately \$400.00. Benedict also stated to both affiants that the feed is placed into a broken down Range Rover and that his delivery people have informed him that the vehicle is infested with rats.

11. On March 1, 2021 at 1030 hours, members of the Connecticut Department of Agriculture, State Animal Control Unit along with members of the Redding Police Department, initiated a continuous joint surveillance of the property located at 147 Cross Highway, Redding. The surveillance was conducted from an adjoining neighbor's property with full consent of the property owner to occupy their property for the purpose of conducting this surveillance. The surveillance operation continued constantly around the clock with either a State Animal Control Officer or a Redding Police Officer performing the observation. The operation concluded during the afternoon hours of March 4, 2021. At all times between these dates, officers maintained a constant observation of the property located at 147 Cross Highway, Redding, looking for any signs of feeding habits as well as the addressing the basic standard of care needs of the animals located on this property.

12. This surveillance revealed many animal health and property management concerns. It was observed that between ten (10) and twelve (12) goats had extremely long hooves. The hooves are so long that they are curling upwards and it is affecting their gait and mobility. Manure control is a major concern. In one paddock the manure has piled up so high that roof line of the shelter is only sticking two and half (2 1/2) to three (3) feet high. There is not constant water being provided to or available to the goats. At one point during the surveillance, Burton, with help from a tall white male, was observed placing store bought one gallon water jugs and placing them from the white male's vehicle into the back seat of Burton's car. the amount of water that is provided is not enough for the approximate 45-50 goats. The Connecticut State Veterinarian's office acts as the official epidemiologist for animal and poultry diseases; coordinates state and federal governmental agencies and livestock producers to control diseases; and oversees and guides the development and management of disease control programs performed by the agency. Acting State Veterinarian and Director of Regulatory Services for the Connecticut Department of Agriculture, Dr. Bruce Sherman, says that at the very minimum, a goat's water intake is a half of gallon of water a day. With the estimated forty-five (45) goats on the property, it would take twenty-two (22) and half gallons of water a day to meet that requirement. Burton was observed using one gallon jugs of store bought water that she had in the back seat of her car. During cold days, these jugs of water were frozen and could not be used. For the period of March 1, 2021, 1030 hrs. to March 2, 2021, 1030 hrs., Burton was observed giving just two gallons of water to the goats. For the period of March 2, 2021, 1030 hrs., to March 3, 2021, 1030 hrs., Burton was observed giving approximately thirteen (13) gallons of water to the goats. For the period of March 3, 2021, 1030 hrs., to March 4, 1030 hrs., Burton was observed giving no more than thirteen (13) gallons of water to

(This is page 4 of a 9 page Affidavit and Application.)


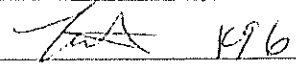
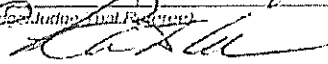
City/Town	Date	Signature and Title of Affiant
MONROE	MAR 09 2021	 # 7
REDDING	MAR 09 2021	 # 96
Jurat	Subscribed and sworn to before me on (Date) MAR 09 2021	Signed (Judge/Judge Trial Referee) 

goats. This averages out to less than half the minimum requirement of water given. Approximately ten (10) clear one gallon water bottles with frozen water was observed lined up along the fence line of paddock #2. The structures provided are in poor condition and do not provide adequate shelter to the animals from the weather. There is photo documentation of these structures. As documented on the surveillance logs, the weather conditions were extreme at times, 18-20 degrees, plus a strong wind chill and the goats that were penned up did not all have space in the shelter. One shelter appears to be a dog kennel with a tarp around it. The tarp was blowing up constantly and would not have given any animals in that enclosure any protection from the wind. The "old barn" is falling down and the south and north sides have no sides. Tarps were used at one point but have fallen or disintegrated. The shed of the "old barn" roof has collapsed and this is where the majority of the goats seek shelter.

13. Based on the above detailed facts, the affiants have probable cause to believe and do believe that evidence of the above stated crime will be found within or upon the property at 147 Cross Highway in the Town of Redding Connecticut and they respectfully request a search warrant be issued to search said property to include house, garage, trailers, vehicles, paddocks, barns and outbuildings located at 147 Cross Highway, Redding CT. The house is a single family two story federal style structure built in 1850 with faded shingles that appear to be of a mustard color. Land records show that the home is owned by William H. Honan and Nancy Burton. The home has approximately 3200 square feet of living space and sits on approximately 3.6 acres of land. There are two driveways, one located on the east side of the home and the on the west. The west driveway extends to a dilapidated barn that survey map describes as "Old Barn" and seize all goats on the property, alive or dead, and to have said animals evaluated and tested for dehydration, emaciation, physical condition, wounds, parasites, injuries and illness by a licensed veterinarian; all animal health and ownership records; photographs of animals; receipts and bills related to animal care and feeding; and medication related to animal care. The seized animals will be taken by transport to York Correctional Institution in Niantic CT where they will be housed in appropriate barn stalls and cared for by state licensed veterinarians as well as Connecticut Department of Agriculture employees.

14. Based on Affiants personal knowledge, training and experience a scene, such as described above, will contain physical evidence, herein before itemized, which will aid in establishing the identity of the perpetrator(s), the circumstances under which a crime was committed, and/or which in general will assist in the discovery of the pertinent facts and that such evidence requires a systematic search to locate, seize, record and process.

(This is page 5 of a 9 page Affidavit and Application.)

City/Town	Date	Signature and Title of Affiant
DANBURY	MAR 09 2021	 # 7
DANBURY	MAR 09 2021	 # 6
Jurat	Subscribed and sworn to before me on (Date) MAR 09 2021	Signed (Judge/Judge Trial Referee) 

The undersigned ("X" one)  has not presented this application in any other court or to any other judge or judge trial referee.  
 has presented this application in another court or to another judge or judge trial referee (specify)

Wherefore the undersigned requests that a warrant may issue commanding a proper officer to search said person or to enter into or upon said place or thing, search the same, and take into custody all such property.

And to submit the property described in the foregoing affidavit and application to laboratory analysis and examination

(This is page 6 of a 9 page Affidavit and Application.)

City/Town	Date	Signature and Title of Affiant
WINDSOR	MAR 09 2021	[Signature] # 1
WINDSOR	MAR 09 2021	[Signature] # 2
Jurat	Subscribed and sworn to before me on (Date) MAR 09 2021	Signature (Judge/Judge Trial Referee) [Signature]



AFFIDAVIT REQUESTING DISPENSATION WITH  
 REQUIREMENT OF DELIVERY  
 pursuant to § 54-33c, Connecticut General Statutes

TO: A Judge of the Superior Court or a Judge Trial Referee

For the reasons set forth below, the undersigned, being duly sworn, requests that the judge / judge trial referee dispense with the requirement of C.G.S. § 54-33c that a copy of the application for the warrant and a copy of any affidavit(s) in support of the warrant be given to the owner, occupant or person named therein with forty-eight hours of the search:


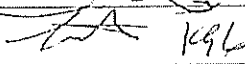
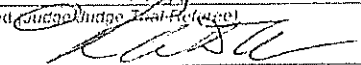
- The personal safety of a confidential informant would be jeopardized by the giving of a copy of the affidavits at such time;
- The search is part of a continuing investigation which would be adversely affected by the giving of a copy of the affidavits at such time;
- The giving of such affidavits at such time would require disclosure of information or material prohibited from being disclosed by chapter 959a of the general statutes;

In addition, it is requested that the requirement of advance service of this warrant upon the customer whose financial records are being sought, be waived pursuant to C.G.S. § 36a-43 (a);

and the specific details with regard to such reasons are as follows:

The undersigned further requests that this affidavit also be included in such nondelivery.

(This is page 7 of a 9 page Affidavit and Application.)

City/Town	Date	Signature and Title of Affiant
DANBURY	MAR 09 2021	 # 7
DANBURY	MAR 09 2021	 1496
Jurat	Subscribed and sworn to before me on (Date) MAR 09 2021	Signed (Judge/Judge Trial Referee) 

The foregoing Affidavit and Application for Search and Seizure Warrant having been presented to and been considered by the undersigned, a Judge of the Superior Court or a Judge Trial Referee, and the foregoing Affidavit having been subscribed and sworn to by the affiant(s) before me at the time it was presented, the undersigned (a) is satisfied therefrom that grounds exist for said application, and (b) finds that said affidavit established grounds and probable cause for the undersigned to issue this Search and Seizure Warrant, such probable cause being the following: From said affidavit, the undersigned finds that there is probable cause for the undersigned to believe that the property described in the foregoing affidavit and application is within or upon the person, if any, named or described in the foregoing affidavit and application, or the place or thing, if any, described in the foregoing affidavit and application, under the conditions and circumstances set forth in the foregoing affidavit and application, and that, therefore, a Search and Seizure warrant should issue for said property.

NOW THEREFORE, by Authority of the State of Connecticut I hereby command any Police Officer of a regularly organized police department, any State Police Officer, any inspector in the Division of Criminal Justice, or any conservation officer, special conservation officer or patrol officer acting pursuant to C.G.S. § 26-6 to whom these presents shall come within ten days after the date of this warrant to enter into or upon and search the place or thing described in the foregoing affidavit and application, or search the person described in the foregoing affidavit and application or both, to wit

The grounds, property, house, garage, trailers, vehicles, paddocks, barns and outbuildings located at 147 Cross Highway, Redding CT. The house is a single family two story federal style structure built in 1850 with faded shingles that appear to be of a mustard color. Land records show that the home is owned by William H Honan and Nancy Burton. The home has approximately 3200 square feet of living space and sits on approximately 3.6 acres of land. There are two driveways, one located on the east side of the home and the other on the west. The west driveway extends to a dilapidated barn that a survey map describes as "Old Barn".

for the property described in the foregoing affidavit and application, to wit

All goats on the property, alive or dead, and to have said animals evaluated and tested for dehydration, emaciation, physical condition, wounds, parasites, injuries and illness by a licensed veterinarian; all animal health and ownership records; photographs of animals; receipts and bills related to animal care and feeding; and medication related to animal care.

submit the property described in the foregoing affidavit and application to laboratory analysis and examination:

and upon finding said property to seize the same, take and keep it in custody until the further order of the court, and with reasonable promptness make due return of this warrant accompanied by a written inventory of all property seized.

The foregoing request that the judge or judge trial referee dispense with the requirement of C.G.S. § 54-33c that a copy of the warrant application and affidavit(s) in support of the warrant be given to the owner, occupant or person named therein and that the affidavit in support of such request also be included in such nondelivery is hereby.

NOT TO EXCEED 2 WEEKS BEYOND DATE WARRANT IS EXECUTED

GRANTED for a period of

This order, or any extension thereof, dispensing with said requirement shall not limit disclosure of such application and affidavits to the attorney for a person arrested in connection with or subsequent to the execution of the search warrant unless, upon motion of the prosecuting authority within two weeks of such arraignment the court finds that the state's interest in continuing nondisclosure substantially outweighs the defendant's right to disclosure

DENIED.

Service of this Search Warrant upon the customer whose financial records are being sought is hereby waived, pursuant to C.G.S. § 35a-43 (a)

(NOTE: AFFIANT'S OATH MUST BE TAKEN PRIOR TO JUDGE / JUDGE TRIAL REFEREE SIGNING BELOW)

(This is page 8 of a 9 page Affidavit and Application.)

Signed at DANBURY, Connecticut, on:	Date	At (Time)	<input type="checkbox"/> a.m.
	MAR 09 2021	1:14	<input checked="" type="checkbox"/> p.m.
Print name of Judicial Official		ROBERT A. D'ANDREA, JUDGE	

**VERIFICATION**

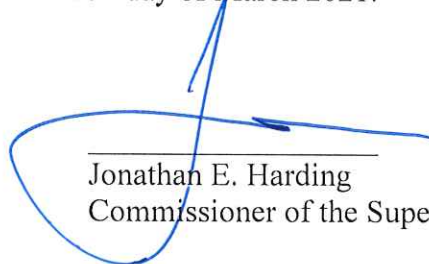
STATE OF CONNECTICUT      )  
  ) ss. Hartford  
COUNTY OF HARTFORD      )

Personally, appeared Jeremiah Dunn, State of Connecticut, Chief State Animal Control Officer, the subscriber, and made oath to the truth of the matters contained in the aforesaid complaint.



\_\_\_\_\_  
Jeremiah Dunn  
Chief State Animal Control Officer

Sworn and subscribed to before me on this 18<sup>th</sup> day of March 2021.



\_\_\_\_\_  
Jonathan E. Harding  
Commissioner of the Superior Court