

RETURN DATE: JUNE 28, 2022

STATE OF CONNECTICUT <i>EX REL</i> ,	:	SUPERIOR COURT
JEREMIAH F. DUNN,	:	
CHIEF STATE ANIMAL CONTROL OFFICER	:	JUDICIAL DISTRICT
	:	OF HARTFORD
v.	:	AT HARTFORD
	:	
28 DOGS AND DEAN MOORE ¹	:	JUNE 1, 2022

VERIFIED PETITION

**COUNT I: CONN. GEN. STAT. § 22-329a
AS TO CUSTODY OF ANIMALS OWNED BY DEAN MOORE**

1. The plaintiff is the State of Connecticut *ex rel*, Jeremiah Dunn, Chief State of Connecticut Animal Control Officer, who, pursuant to Conn. Gen. Stat. § 22-328(b), may exercise the powers granted to any State Animal Control Officer.
2. Pursuant to Conn. Gen. Stat. § 22-329a, any animal control officer may lawfully take physical custody of any animal upon issuance of a warrant finding probable cause that such animal is neglected or found cruelly treated, in violation of Conn. Gen. Stat. § 53-247, and may seek to obtain temporary and permanent care and custody of any animal who is neglected or who is cruelly treated in violation of Conn. Gen. Stat. § 53-247.
3. Pursuant to a search and seizure warrant signed on May 2, 2022 and executed on May 2, 2022, the State of Connecticut, Department of Agriculture (“the Department”), through its State Animal Control Officers, has taken physical custody of 28 German Shepherd breed dogs, including 10 adult dogs and 18 puppies, pursuant to Conn. Gen. Stat. § 22-329a(b). Seven (7) adult dogs were seized on May

¹ Dean Moore is listed as a defendant in the caption of this *in rem* action solely for purpose of enabling him to file an appearance.

2, 2022 from the property owned by Dean Moore at 20 Nedobity Road in Higganum, Connecticut (“the Site”). In addition, three (3) adult dogs and thirteen (13) puppies were previously removed from the Site under exigent circumstances, as detailed in the warrant. Then on May 28, 2022, another five (5) puppies were born to one of the adult dogs who had been seized. All 28 dogs were the subject of the search warrant authorizing their seizure. *See* May 2, 2022 Search and Seizure Warrant, attached as Exhibit 1.

4. The plaintiff currently has physical custody of all the dogs referenced in the preceding paragraphs and now seeks to obtain temporary custody and permanent custody and ownership of all the dogs pursuant to the procedures outlined in Conn. Gen. Stat. § 22-329a and to recoup expenses incurred by the Department in caring for the animals, as provided by the statute.
5. Upon information and belief, Dean Moore owns all the dogs which are the subject of this petition.
6. Dean Moore’s last known address is 20 Nedobity Road in Higganum, Connecticut.

Factual Basis for Seizure

7. A detailed accounting of the factual basis for the seizure is contained in the May 2, 2022 Search and Seizure Warrant, attached as Exhibit 1 and incorporated herein by reference.
8. To summarize, Dean Moore failed to make adequate provision for the care of his many dogs during his planned six and a half week (April 18 to June 1) vacation to the Philippines with his family. While he arranged for temporary caretakers, they were not adequately instructed and provisioned by Moore, and Moore left the dogs in

conditions that were unsafe, unsanitary, and provided inadequate shelter from the elements.

9. Only weeks before Moore departed on April 18, 2022, two of his female dogs had given birth to a total of nineteen (19) puppies. All the dogs, including the mother dogs and puppies, were being kept outside in cold temperatures, and the puppies were unprotected from attacks by Moore's adult German Shepherd dogs. The overnight lows during the period of April 18-25 ranged from 30 to 42 degrees Fahrenheit, which was dangerously cold for the puppies, who were only a few weeks old.
10. As a result of exposure to the elements and/or lack of adequate supervision, six (6) puppies had died within days of Moore's departure. The other thirteen (13) puppies were removed on an emergency basis for their protection to a foster home at 50 River Road in Clinton. A vet found the puppies to have contagious parasites, including Giardia and Coccidia, which was likely contracted from exposure to contaminated feces in the unclean environment in which they were being kept. Giardia is an intestinal parasite that can produce weight loss and chronic diarrhea, and Coccidia is an intestinal parasitic infection that can cause hemorrhaging, inflammation, diarrhea, straining to urinate or defecate, and dehydration.
11. Fencing at the Site was in disrepair, which is especially dangerous because the property is near a highway. One adult dog escaped soon after Moore's departure and has not been located. The other three adult dogs being kept in the enclosure with the defective fencing were immediately removed for their protection and taken to the Clinton Pound.

12. Moore left nowhere near enough food (only about two weeks' worth) for the dogs to sustain them during his six week intended absence, and Moore provided no instructions to the temporary caretakers regarding whether and what medications should be administered to the dogs.
13. When contacted by the temporary caretakers regarding the dead puppies, Moore seemed concerned only with the loss of money and instructed that they be buried. When the temporary caretakers requested permission to take an injured puppy to the vet, Moore declined, telling them to "let nature take its course." When the caretakers took the injured puppy to the vet anyway, Moore instructed that the puppy be euthanized.
14. Accordingly, within days of starting to look after the dogs, the temporary caretakers reached out to animal control regarding the deeply problematic conditions and risks thereby posed to the animals, including the deaths of several puppies. The caretakers indicated their desire and intent to resign.
15. Repeated efforts by the Department to get Moore to address the issues and to make adequate provision for the care of the dogs were unsuccessful.
16. On May 2, 2022, the Department executed the warrant and seized the seven (7) dogs still present at the Site, based on the conditions in which they were being kept and the danger of leaving them there without adequate care, supervision, shelter, food and medical care. The State now seeks temporary custody and, after a hearing, permanent ownership of the animals on account of Moore's neglect and cruelty.

17. One of the adult female dogs, Athena, that was seized was pregnant and gave birth on May 28, 2022 to five puppies. The State seeks temporary custody and permanent custody and ownership of those five newly-born puppies as well.

May 23, 2022 Arrest

18. On May 23, 2022, Dean Moore was arrested on 20 counts of animal cruelty in violation of Conn. Gen. Stat. 53-247a, pursuant to a warrant signed by the court on May 19, 2022, attached as Exhibit 2 and incorporated herein by reference. Nineteen counts of animal cruelty were for having left the nineteen puppies outdoors in below-freezing weather, and one count was for failing to give medical care to an adult dog named Olive.

19. The court set bond at \$20,000 and imposed the additional conditions that Moore have “no contact with the relocated animals and/or their foster caregivers” and “no possession of any animals.” *Id.*

20. As detailed in the application for the arrest warrant, *id.* at ¶ 12, one of the adult female dogs who was seized, Olive, appeared to be underweight and unwell. Upon investigation, the Department learned that Olive was diagnosed with Lyme disease on February 22, 2022, at which time she had a fever and was prescribed a twenty-eight (28) day supply of 300 milligram tablets of doxycycline. Moore reported to the veterinarian on March 19 that the medication was finished. However, one of the temporary caretakers in April noted a doxycycline pill bottle prescribed to Olive that was still full, suggesting that the medication was never given to her. Upon examination after seizure by a veterinarian, Olive was found to still have a fever and to still have Lyme disease, for which she is now being treated.

21. In addition, several of the adult dogs have not been vaccinated for rabies as required by law.
22. The dogs are not licensed with the Town of Haddam as is required.
23. Moore has previously been issued infractions by the town for failure to license the dogs and for failure to vaccinate them for rabies. He responded aggressively toward the town animal control officer issuing the infractions, and also failed to correct the above-noted problems for which he was being cited.

Conclusion

24. Based on the above facts, Dean Moore failed to make adequate provision for the care of his many dogs during his planned, prolonged absence, thereby exacerbating the unsafe and unsanitary conditions in which they were already kept. Specifically, he failed to provide the dogs with necessary sustenance, failed to provide the dogs with proper care, including both routine daily care and proper medical care, failed to provide the dogs with safe, clean, and proper shelter and protection from the weather, and/or failed to restrain the dogs from doing injury to themselves or to each other. As a result of this neglect, numerous dogs died, suffered illness, were injured, escaped, or were otherwise endangered.
25. Based on the above facts, Dean Moore has neglected and/or cruelly treated the dogs, in violation of Conn. Gen. Stat. § 53-247.
26. Based on the above facts, there was reasonable cause to find that the condition and circumstances surrounding the care of the dogs required the Department to immediately take lawful charge of the dogs pursuant to a warrant in order to safeguard their welfare.

27. Based on the above facts, both temporary custody and permanent ownership of the dogs should be granted to the Department of Agriculture.

PRAYER FOR RELIEF

WHEREFORE, pursuant to Conn. Gen. Stat. §§ 22-329a, 22-4c(3), 22-328, 22-329, 22-330, and the Court's equity jurisdiction, the plaintiff requests:

1. That the Court issue, based on the information in this Verified Petition and the attachments thereto, an order pursuant to Conn. Gen. Stat. § 22-329a(d)(2) vesting in the Connecticut Department of Agriculture the temporary care and custody of the dogs that are the subject of the petition, pending a hearing on the petition.
2. That, upon entering the order of temporary care referenced in paragraph one, the Court also immediately issue an order requiring the owner of the dogs to either relinquish ownership of the dogs to the Connecticut Department of Agriculture or to post by a date certain a surety or cash bond with the Connecticut Department of Agriculture in the amount of five hundred dollars (\$500) per dog for the Department's reasonable expenses in caring and providing for such dogs while Moore contests custody, pursuant to Conn. Gen. Stat. § 22-329a(f). Given that there are 28 dogs, the total statutory bond at \$500 per dog is \$14,000.
3. Should Dean Moore, the owner of the dogs, post the required bond and desire to contest custody, the plaintiff requests that the Court issue to Dean Moore an order to show cause for a hearing regarding why the relief sought in the Verified Petition, including permanent ownership of the dogs at issue, should not be granted. Pursuant to Conn. Gen. Stat. § 22-329a(d), a hearing shall be held not later than fourteen (14)

days after issuance of the order vesting temporary care and custody in the Department of Agriculture.

4. That the Court, after hearing, issue an order pursuant to Conn. Gen. Stat. § 22-329a finding that the dogs at issue were neglected and/or were cruelly treated, in violation of Conn. Gen. Stat. § 53-247.
5. That the Court, after hearing, vest permanent custody and ownership of the dogs at issue with the Connecticut Department of Agriculture, pursuant to Conn. Gen. Stat. § 22-329a(g).
6. That, pursuant to Conn. Gen. Stat. § 22-329a(h), if the Court finds, after hearing, that the dogs at issue were neglected and/or cruelly treated, the Court order the owner to pay the Connecticut Department of Agriculture the expenses incurred in providing proper food, shelter and care to each dog, calculated at the rate of fifteen (15) dollars per dog per day, until the date that ownership of these dogs is vested in the State, and also that the Court order the owner to pay all veterinary costs and expenses incurred for the welfare of these dogs that are not covered by the per diem rate.
7. That the Court order such other and additional relief as is just and equitable.
8. This action is brought by the State of Connecticut, which is not liable for any costs in this action.

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 2022-177

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 dogs 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, vehicles, and outbuildings located at 20 Nedobity Street, Higganum, CT. The house is a single family two story saltbox colonial style structure built in 1994 with grey siding. Land records show that the home is owned by Dean Moore. The home has approximately 1933 square feet of living space and sits on approximately 2.10 acres of land. Seven (7) dogs located on the east side of the home in metal kennels. Three (3) dogs located at the Clinton Pound and thirteen (13) puppies located at 50 River Road, Clinton CT.

(This is page 1 of a 10 page Affidavit and Application.)

City/Town	Date	Signature and Title of Affiant
Connecticut State Animal Control	5/2/2022	
Madison	5/2/2022	ACO
Jurat	Subscribed and sworn to before me on (Date) 5/2/2022	Signed (Judge/Judge Trial Referee)

EXHIBIT 1

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, Town of Madison Animal Control Officer Elizabeth Amendola, being duly sworn, does depose and state that she is a full time member of Madison Animal Control Unit since August 13, 2017 and a part time one since 2009. At all times mentioned herein she was acting as a member of said department. 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 April 24, 2022, Haddam Animal Control Officer (ACO) Daun Kowalski received a complaint from Naja Muller, a dog sitter who was hired by Dean Moore to feed and water his eleven (11) German Shepherd dogs, four of which are normally kept in his home located at 20 Nedobity Road, Higganum, CT, Monday thru Friday, from April 18, 2022 to June 1, 2022 while Moore and his family go on vacation to the Philippines. Muller was advised that a Dana and Donna Mamangun, a couple from down the street, will be taking care of the dogs on the weekends. A few weeks prior to Moore leaving, two of the dogs gave birth. Aries had ten (10) puppies while Shadow had nine (9) in her litter. These mothers and their puppies were left outside in each dogs kennel area. The temperatures during this time dropped below freezing and the area is not suitable for a mother and her litter. Muller had explained to Affiant Kowalski that because of an incident that has transpired on April 22, 2022 she can no longer care for the animals and has attempted to resign but Moore has failed to respond and because of this she is seeking assistance from Haddam Animal Control. Muller stated that on April 22, 2022, she arrived in the morning to see that there were two dead puppies in the outside kennel with Aries and that a puppy from Shadow's litter appeared to be injured. Muller contacted Moore about the injured puppy and taking it to the vet. Moore refused and told Muller to "let nature take its course".

4. On April 24, 2022, ACO Kowalski responded to the home and made contact with Dana and Donna Mamangun. The Mamangun's stated that Moore had requested that they bury the two dead puppies in the back yard which they did. Pictures of the dead puppies show trauma to the head and neck area. Dana Mamangun brought the injured puppy to Pieper Olsen Hospital in Middletown without Moore knowing. Because the puppies were separated from their mothers, Moore was contacted by the ACO Kowalski and explained that the puppies need to be in a warm, dry and clean environment which, in the current situation was not going to happen. A foster home was found and all thirteen remaining puppies were brought there. It was also during this conversation that Dana, who was also a party to the conversation, was instructed, by Moore, to bring the injured puppy back home. Dana refused this

(This is page 2 of a 10 page Affidavit and Application.)

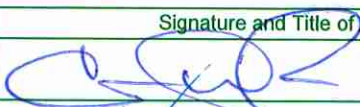


City/Town	Date	Signature and Title of Affiant
State of Connecticut	5/2/2022	 SACO
Madison	5/2/2022	 ACO
Jurat	Subscribed and sworn to before me on (Date) 5/2/2022	Signed (Judge/Judge Trial Referee) 

EXHIBIT 1

request and later, Pieper Olsen Animal Hospital staff, was advised to euthanize the puppy by Moore.

5. Late afternoon on April 29, 2022, Affiant DellaRocco was contacted by a Dan Secondino of Clinton, CT. Secondino stated that he was fostering thirteen (13) German Shepherd puppies ages approximately four (4) to five (5) weeks old. Secondino is concerned that the puppies are having medical issues such as very loose stool, worms, and being very lethargic. Secondino explained to this Affiant that on April 25, 2022, he was asked by one of the caretakers to house, with permission of the Haddam Animal Control Officer, some German Shepherd puppies because their mothers, two separate litters, had injured/killed some of the other litter mates. Affiant DellaRocco did respond to the home and noticed that all thirteen (13) puppies were showing signs of having either Giardia and/or Parvo and that they all were very lethargic. A medical exam of the puppies was conducted by Guilford Vet Hospital. The puppies have been identified as having at least Giardia(parasite) and coccidia (parasite). Both of these parasites are highly contagious. These parasites are contracted by eating or licking feces but both Giardia and Coccidia can be control by having a clean dry environment and that cleaning and disinfecting a contaminated area would minimize the transmission of these parasites . Feces of contaminated dogs needs to be bagged and discarded in properly away from living and playing area. Feces and urine is seen throughout both the kennel areas and the fenced in outside run. Both ground surfaces are mulch or shredded wood and can not be clean and/or disinfected. This is consistent with the lethargic behavior of the puppies and their constant loose stool.

6. On April 29, 2022, Affiant DellaRocco met with Naja Muller at 20 Nedobity Road Higganum CT. The property is located on the eastside of Route 9 North. There is a large fenced in area, approximately 40' by 20', which is adjacent to the highway and located on the west end of the property. The fence surrounding this area was made of wood and at certain points measured less than four feet in height. The wood slats were long which made them very flimsy and unreliable. There was numerous patch jobs around the perimeter and nails and screws sticking out which could cause injury to people or animal. There is an electric fence, one that would be used for horses, going around the inside of the top rail of the fencing. The electric fencing was not working even though it was plugged in. There was adequate shelter for the three dogs. It was at this time that Muller stated one of the dogs were missing and that earlier in the day there was four dogs in the pen. To the east of the home was a erected proper outdoor kennels. There were four (4) kennels (approximately 4' X10') on one side and four (4) kennels on the other side separated by a large fenced in area (approximately 16' X 16'). The doors to the kennels faced inward. There were seven (7) dogs located in these kennels. There is no way to properly clean and disinfect the runs. Both the kennel area flooring and the outside run area flooring is mulch/shredded wood. You can not clean and/or disinfect wood and dirt, wood and dirt is not impervious surfaces. There was feces and urine located through out both areas. These kennels appeared to be new. Each kennel had a medium size igloo doghouse. Two adjacent kennels on the southeast side were damaged by the two dogs attempting to get at each other. Plywood has been erected but this is doing very little and it appears that these dogs are extremely stressed. Through my training and experience dogs show stress in many different ways such as shaking, yawing, and pacing back and forth. All of these indications were observed by all dogs present. There was food stored in a large two story shed. The food consisted of five (5), fifty (50) pound bags of dog food and an open bag that was more than halfway full. This does not appear to be enough food to

(This is page 3 of a 10 page Affidavit and Application.)


City/Town	Date	Signature and Title of Affiant
State of Connecticut	5/2/2022	 Saco
Madison	5/2/2022	 Aco
Jurat	Subscribed and sworn to before me on (Date) 5/2/2022	Signed (Judge/Judge Trial Referee) 

EXHIBIT 1

sustain the dogs until June 1, 2022. It is my opinion that this food would be gone in less than two weeks. No arrangements were made to have food delivered or picked up.

7. Muller explained to Affiant DellaRocco that when she arrived on April 18, 2022, the four outside kennels on the north side were actually two kennels because a small door was opened within the kennel to allow for it to be bigger for the moms and their litters. One of these kennels had Aries and her ten (10) puppies in it along with an older dog named Olive. The second kennel had Shadow with her nine (9) puppies. The overnight temperatures were freezing or below and the igloo dog house is not large enough to house an adult dog with a large litter. Muller explained that on the evening of April 22, 2022 she arrived began to feed Shadow first. While doing so, she noticed two lifeless puppies in Aries cage and went to investigate. While doing so, Aries and Olive exited the kennel and Aries got into Shadows kennel grabbing one of the puppies. Muller intervened but the puppy was injured bleeding from the mouth. Muller contacted Moore who was upset about the loss of money for the two deceased puppies and told her to leave the injured puppy and "let nature take its course". Dana and Donna Mamangun were called and took over the situation for the rest of the weekend. Upon her return on Monday April 25, 2022, Muller noticed that Olive had been moved, by Dana Mamangun, to the large pen and that ten puppies were placed in the garage in a kiddy pool. Aries was left alone in her kennel and Shadow had three puppies with her. The ten (10) puppies moved to the garage were left alone over night and shivering from the cold. These puppies were moved to a foster home for care. Muller states that the next day or two she observed that Shadows puppies had stopped nursing and so these puppies were moved to foster care as well. Muller's final statement to Affiant DellaRocco that she had sent her resignation letter to Moore and that she can not handle the issues at the property.

8. Affiant DellaRocco made contact with Dana and Donna Mamangun. Moore had asked Dana and Donna to help out by taking care of the dogs on the weekend. Dana and Donna admitted that they are not experienced enough dog owners to take care of this many dogs. Dana reconized this very early and because his wife, Donna, is eight months plus (8+) pregnant he has refused to allow her to handle any of the dogs. Dana explained that the injured puppy was taken to Piper Olsen Animal Hospital in Middletown where it was euthanized per order of Moore. Sometime over this weekend, Dana and Donna, noticed that Aries had killed another one of her puppies and that two other puppies were missing. This totaled six puppies had died leaving just thirteen (13) remaining. Dana and Donna confirmed with Affiant DellaRocco that there was a dog missing from the large outside pen and that they believed it to be "Scout". "Scout" is identified as a very large intact male German Shepherd. Dana and Donna had concerns as to them being able to give proper care and that they are now just really reacting to situation after situation. It appears that there is not enough dog food because Moore isn't expected to be back until June 1, 2022.

9. Affiant DellaRocco was worried about the three dogs remaining in the poorly constructed enclosure that runs directly along side Route 9 north. The fact that one dog is already missing from this enclosure, the proximity of the highway, and the failure to properly supervise the dogs, three (3) were taken into protective custody for the prevention of animal cruelty. The three dogs taken were, Olive, a medium size female who appeared to be sick. She was was cowering in the corner and was lethargic. Athena, large female who appeared to be pregnant (confirmed late by Moore) and Jagger, a large

(This is page 4 of a 10 page Affidavit and Application.)



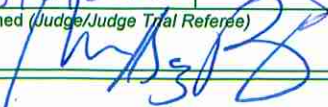
City/Town	Date	Signature and Title of Affiant
State of Connecticut	5/2/2022	 SACO
Madison	5/2/2022	 ACO
Jurat	Subscribed and sworn to before me on (Date) 5/2/2022	Signed (Judge/Judge Trial Referee) 

EXHIBIT 1

intact male. Affiant Amendola assisted in the transport and these three dogs were taken to the Town of Clinton Dog Pound. The Town of Madison shares the same dog pound with the Town of Clinton.

10. At approximately 8:00 pm on April 29, 2022, Affiant DellaRocco made contact with Dean Moore over the phone. Moore confirmed that he was out of the country and that he is twelve (12) hours ahead. It was explained to Moore that three of these dogs were taken into custody for the prevention of animal cruelty because there was a concern that they can easily get out of the poorly erected fencing. Moore disagreed but understood. Moore was asked what his plan is to take care of the dogs because Muller had resigned. Moore didn't have one and it was explained that it is his responsibility to find a suitable pet sitter or to get a commercial kennel. Moore stated that he will have to ask around. Moore was asked about why the litters were left outside with their mothers and not placed in a warm, safe, low stressed environment. His response was that the trip to the Philippines was long over due because of covid and he didn't think he did anything wrong. It was agreed that another conversation was to happen twenty four hours later with hopes that a plan is in place.

11. At approximately 7:30 pm on April 30, 2022, Affiant DellaRocco and Moore had another phone conversation. Moore stated that he had spent \$11,000.00 to get a plane ticket back to the US for May 11, 2022 and that he has asked his friend Marc Pononion, unknown experience, to take care of the dogs. Moore explained that Pononion can only do it one time a day and I explained that this would be unacceptable. The dogs should not be left outside in these kennels without any supervision. They are large strong dogs and some of them are constantly damaging the fencing. It was also explained to Moore that there was not enough food remaining.

12. Affiant DellaRocco is concerned about the well being of all the remaining dogs on the property. Three dogs are of major concern. Because of the abrupt taking of the puppies and because it is impossible to disinfect the runs, mastitis (an inflammation of the breasts that can be prevented with cleanliness) is a concern for Aries and Shadow. There was evidence that Covid, a large female German Shepherd mix, has some issues because it appears she is very underweight. Affiant DellaRocco was advised, by all three caregivers, that some of these dogs have medication in the shed but that they were not informed to distribute them. A call to Higganum Vet was made but they are closed over the weekend.

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 20 Nedobity Road in the Town of Higganum Connecticut and they respectfully request a search warrant be issued to search said property to include house, garage, vehicles, and outbuildings located at 20 Nedobity Road in the Town of Higganum. The house is a single family two story saltbox colonial style structure built in 1994 with grey siding. Land records shows that the home is owned by Dean Moore. The home has approximately 1933 square feet of living space and sits on approximately 2.10 acres of land. To seize all dogs on the property, alive or dead (including the three (3) dogs taken into protective custody on April 29, 2022), 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

(This is page 5 of a 10 page Affidavit and Application.)



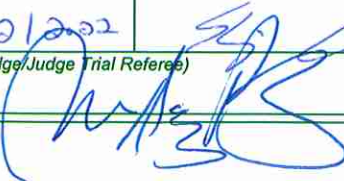
City/Town	Date	Signature and Title of Affiant
State of Connecticut	5/2/2022	 SACO
Madison	5/2/2022	 ACO
Jurat	Subscribed and sworn to before me on (Date) 5/2/2022	Signed (Judge/Judge Trial Referee) 

EXHIBIT 1

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 to area dog pounds where they will be housed in appropriate dog kennels and cared for by state licensed veterinarians as well as state and local animal control officers.

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 6 of a 10 page Affidavit and Application.)




City/Town	Date	Signature and Title of Affiant
State of Connecticut	5/2/2022	 SAACO
Madison	5/2/2022	 ACO
Jurat	Subscribed and sworn to before me on (Date) 5/2/2022	Signed (Judge/Judge Trial Referee) 

EXHIBIT 1

- 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 7 of a 10 page Affidavit and Application.)

City/Town	Date	Signature and Title of Affiant
State of Connecticut	5/2/2022	 SBCO
Madison	5/2/2022	 ACO
Jurat	Subscribed and sworn to before me on (Date) 5/2/2022	Signed (Judge/Judge Trial Referee) 

EXHIBIT 1

**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 8 of a 10 page Affidavit and Application.)

City/Town	Date	Signature and Title of Affiant
State of Connecticut	5/2/2022	[Signature] SA Co
Madison	5/2/2022	[Signature] SA Co
Jurat	Subscribed and sworn to before me on (Date) 5/2/2022	Signed (Judge/Judge Trial Referee) [Signature]

EXHIBIT 1

SEARCH AND SEIZURE WARRANT

STATE OF CONNECTICUT
SUPERIOR COURT

SEARCH AND SEIZURE WARRANT

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, vehicles, and outbuildings located at 20 Nedobity Street, Higganum, CT. The house is a single family two story saltbox colonial style structure built in 1994 with grey siding. Land records show that the home is owned by Dean Moore. The home has approximately 1933 square feet of living space and sits on approximately 2.10 acres of land. Seven (7) dogs located on the east side of the home in metal kennels. Three (3) dogs located at the Clinton Pound and thirteen (13) puppies located at 50 River Road, Clinton CT.

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

All dogs 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. § 36a-43 (a).

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

(This is page 9 of a 10 page Affidavit and Application.)

Signed at <i>Middlebury</i> Connecticut, on: <i>5/2/2022</i>	Date	At (Time) <i>9.43</i>	<input checked="" type="checkbox"/> a.m.
Signed (Judge/Judge Trial Referee) <i>[Signature]</i>	Print name of Judicial Officer <i>Caucerz-Fig</i>		<input type="checkbox"/> p.m.

**RETURN FOR AND INVENTORY
PROPERTY SEIZED ON SEARCH AND SEIZURE WARRANT**

EXHIBIT 1

			Inventory control number
Judicial District of Middletown	G.A. 9	At (Address of Court) 1 Court Street, Middletown	Date of seizure 5/2/2022
Docket number CR-	Uniform arrest number	Police case number 2022-177	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, vehicles, and outbuildings located at 20 Nedobity Street, Higganum, CT. The house is a single family two story saltbox colonial style structure built in 1994 with grey siding. Land records show that the home is owned by Dean Moore. The home has approximately 1933 square feet of living space and sits on approximately 2.10 acres of land.

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

Total Cash Seized: _____, consisting of

Seven Adult Dogs on May 2, 2022 3(M) 4(F)

1. Bane-unaltered male blk/tan GSD
2. Aries-female blk/tan GSD
3. Shadow-female blk GSD
4. Covid-female tan GSD/Mix
5. Simba-unaltered male blk/tan GSD
6. Hicante-female blk/tan GSD
7. Odin-unaltered male blk GSD

Three Adult Dogs on April 29, 2022 (protective custody) 1(M) 2(F)

1. Athena-female (pregnant) blk/tan GSD
2. Jagger-unaltered large male blk/tan GSD
3. Olive-female tan GSD

Thirteen GSD puppies

1. Pink collar-f
2. Dark Blue collar-m
3. Light Blue collar-m
4. Green collar-m
5. Yellow collar-m
6. Red collar-m
7. Purple collar-f
8. Light Purple collar-f
9. Brown collar-m
10. Black collar-m
11. Gray collar-m
12. Seafoam collar-f
13. Orange collar-m

and I gave a copy of such warrant to Dean Moore, the owner or occupant of the dwelling, structure, motor vehicle or place designated therein, or to placed in kennel area, the person named therein, on (Date) 5/2/2022.

(This is page 10 of a 10 page Affidavit and Application.)

Date	Signed (Officer's signature and department)
------	---

NOTE: Form JD-CR-61, pages 1 - 10 must be supplemented by Form JD-CR-52.

EXHIBIT 2

INFORMATION

STATE OF CONNECTICUT
SUPERIOR COURT

Disposition date

Police Case number 2022-177	Agency name Connecticut Department of Agriculture	Agency number 3002
---------------------------------------	---	------------------------------

Title, Allegation and Counts

State of Connecticut vs. (Name of accused) Moore, Dean (12/22/1989)		Residence (Town) of accused Higganum	Docket number		
Address			Date of birth	The undersigned Prosecuting Authority of the Superior Court of the State of Connecticut charges that:	
To be held at (Town) Middletown		Geographical area number 9	Court date		
Count One — Did commit the offense of: Cruelty to Animal			Continued to	Purpose	Reason
At (Town) Higganum	On or about (Date) April 18, 2022	In violation of General Statute number 53-247a			
Count Two — Did commit the offense of: Cruelty to Animal					
At (Town) Higganum	On or about (Date) April 18, 2022	In violation of General Statute number 53-247a			
Count Three — Did commit the offense of: Cruelty to Animal					
At (Town) Higganum	On or about (Date) April 18, 2022	In violation of General Statute number 53-247a			

See other sheet for additional counts

Date: **5/18/22** Signed (Prosecuting Authority): *[Signature]*

Court Action

Defendant advised of rights before plea (Judge) (Date)	Bond	Surety	<input type="checkbox"/> 10 % Election (Date)
<input type="checkbox"/> Attorney <input type="checkbox"/> Public defender <input type="checkbox"/> Guardian	Bond change		<input type="checkbox"/> Cash <input type="checkbox"/> CT <input type="checkbox"/> JY
			Seized property inventory number

Count	Plea date	Plea	Plea withdrawn		Verdict finding	Fine	Remit	Additional disposition
			Date	New plea				
1						\$	\$	
2						\$	\$	
3						\$	\$	

Date	Other Court Action	Judge

Receipt number	Cost <input type="checkbox"/> IMP <input type="checkbox"/> NCI	Bond information <input type="checkbox"/> Bond forfeited <input type="checkbox"/> Forfeiture vacated <input type="checkbox"/> Forfeiture vacated and bond reinstated			
Application fee - receipt number if paid	Circle one W I Q	Program fee - receipt number if paid	Circle one W I Q	Probation fee - receipt number if paid	Circle one W I Q
Prosecutor on original disposition	Reporter/monitor on original disposition	Signed (Clerk)		Signed (Judge)	

EXHIBIT 2

INFORMATION

STATE OF CONNECTICUT
SUPERIOR COURT

Disposition date
Agency number 3002

JD-CR-71 Rev. 10-10

Police Case number
2022-177

Agency name
Connecticut Department of Agriculture

Additional Counts

Geographical area number 9	State of Connecticut vs. Moore, Dean (12/22/1989)		
Count Fifteen — Did commit the offense of:			
Cruelty to Animal			
At (Town) Higganum	On or about (Date) April 18, 2022	In violation of General Statute number 53-247a	
Count Sixteen — Did commit the offense of:			
Cruelty to Animal			
At (Town) Higganum	On or about (Date) April 18, 2022	In violation of General Statute number 53-247a	
Count Seventeen — Did commit the offense of:			
Cruelty to Animal			
At (Town) Higganum	On or about (Date) April 18, 2022	In violation of General Statute number 53-247a	
Count Eighteen — Did commit the offense of:			
Cruelty to Animal			
At (Town) Higganum	On or about (Date) April 18, 2022	In violation of General Statute number 53-247a	
Count Nineteen — Did commit the offense of:			
Cruelty to Animal			
At (Town) Higganum	On or about (Date) April 18, 2022	In violation of General Statute number 53-247a	
Count Twenty — Did commit the offense of:			
Cruelty to Animal			
At (Town) Higganum	On or about (Date) April 18, 2022	In violation of General Statute number 53-247a	
Count Twenty-one — Did commit the offense of:			
At (Town)	On or about (Date)	In violation of General Statute number	
Count Twenty-two — Did commit the offense of:			
At (Town)	On or about (Date)	In violation of General Statute number	
Count Twenty-three — Did commit the offense of:			
At (Town)	On or about (Date)	In violation of General Statute number	
Count Twenty-four — Did commit the offense of:			
At (Town)	On or about (Date)	In violation of General Statute number	
Count Twenty-five — Did commit the offense of:			
At (Town)	On or about (Date)	In violation of General Statute number	

Signed (Prosecuting Authority)

Charles W. Cooper

Printed name of Prosecuting Authority

Cooper

Date signed

5/18/22

EXHIBIT 2

INFORMATION

JD-CR-71 Rev. 10-10

STATE OF CONNECTICUT
SUPERIOR COURT

Disposition date

Police Case number
2022-177

Agency name
Connecticut Department of Agriculture

Agency number 3002

Additional Court Action

Geographical area number **9** **State of Connecticut vs. Moore, Dean (12/22/1989)**

Count	Plea date	Plea	Plea withdrawn		Verdict finding	Fine	Remit	Additional disposition
			Date	New plea				
4						\$	\$	
5						\$	\$	
6						\$	\$	
7						\$	\$	
8						\$	\$	
9						\$	\$	
10						\$	\$	
11						\$	\$	
12						\$	\$	
13						\$	\$	
14						\$	\$	

EXHIBIT 2

INFORMATION

JD-CR-71 Rev. 10-10

STATE OF CONNECTICUT
SUPERIOR COURT

Disposition date

Police Case number
2022-177

Agency name
Connecticut Department of Agriculture

Agency number
3002

Additional Court Action

Geographical area number **9**

State of Connecticut vs. Moore, Dean (12/22/1989)

Count	Plea date	Plea	Plea withdrawn		Verdict finding	Fine	Remit	Additional disposition
			Date	New plea				
4						\$	\$	
5						\$	\$	
6						\$	\$	
7						\$	\$	
8						\$	\$	
9						\$	\$	
10						\$	\$	
11						\$	\$	
12						\$	\$	
13						\$	\$	
14						\$	\$	

EXHIBIT 2

INFORMATION

JD-CR-71 Rev. 10-10

STATE OF CONNECTICUT
SUPERIOR COURT

Disposition date

Police Case number 2022-177

Agency name Connecticut Department of Agriculture

Agency number 3002

Additional Court Action

Geographical area number 9	State of Connecticut vs. Moore, Dean (12/22/1989)
--------------------------------------	--

Count	Plea date	Plea	Plea withdrawn		Verdict finding	Fine	Remit	Additional disposition
			Date	New plea				
15						\$	\$	
16						\$	\$	
17						\$	\$	
18						\$	\$	
19						\$	\$	
20						\$	\$	
21						\$	\$	
22						\$	\$	
23						\$	\$	
24						\$	\$	
25						\$	\$	

EXHIBIT 2

ARREST WARRANT APPLICATION

JD-CR-64b Rev. 10-10
C.G.S. § 54-2a
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT
SUPERIOR COURT
www.jud.ct.gov

For Court Use Only	
Supporting Affidavits sealed	
<input type="checkbox"/> Yes	<input type="checkbox"/> No

Police Case number 2022-177	Agency name Connecticut Department of Agriculture	Agency number 3002
Name (Last, First, Middle Initial) Moore, Dean (12/22/1989)	Residence (Town) of accused Higganum	Court to be held at (Town) Middletown
		Geographical Area number 9

Application For Arrest Warrant

To: A Judge of the Superior Court

The undersigned hereby applies for a warrant for the arrest of the above-named accused on the basis of the facts set forth in the: Affidavit Below. Affidavit(s) Attached.

Date 5/18/22	Signed (Prosecuting authority) <i>James W Cooper</i>	Type/print name of prosecuting authority J Cooper
------------------------	---	---

Affidavit

The undersigned affiant, being duly sworn, deposes and says:

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 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 persons acting in their official capacity and from reports and statements made by prudent and credible witnesses.

2. On April 24, 2022, Haddam Animal Control Officer (ACO) Daun Kowalski received a complaint from Naja Muller, a dog sitter who was hired by Dean Moore to feed and water his eleven (11) German Shepherd dogs, four of which are normally kept in his home and the other left in an outside pen located at 20 Nedobity Road, Higganum, CT, Monday thru Friday, from April 18, 2022 to June 1, 2022 while Moore and his family go on vacation to the Philippines. Muller was advised that a Dana and Donna Mamangun, a couple from down the street, will be taking care of the dogs on the weekends. A few weeks prior to Moore leaving, two of the dogs gave birth. Aries had ten (10) puppies while Shadow had nine (9) in her litter. These mothers and their puppies were left outside in each dogs kennel area. The temperatures during this time dropped below freezing which is a major problem for a puppy. The puppy's coat at this age is not made to keep heat in and water out. The litters needed a dry warm environment and because of this, the area used is not suitable for mother and her litter. Muller never had access to the home nor garage where the litters could have a warm and dry area. Muller had explained to ACO Kowalski that because of an incident that has transpired on April 22, 2022 she can no longer care for the animals and has attempted to resign but Moore has failed to respond and because of this she is seeking assistance from Haddam Animal Control. Muller stated that on April 22, 2022, she arrived in the morning to see that there were two dead puppies in the outside kennel with

(This is page 1 of a 6 page Affidavit.)

Date 5/18/2022	Signed (Affiant) <i>[Signature]</i> # 7
Jurat 18th May 2022	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) <i>[Signature]</i>

Finding

The foregoing Application for an arrest warrant, and affidavit(s) attached to said Application, having been submitted to and considered by the undersigned, the undersigned finds from said affidavit(s) that there is probable cause to believe that an offense has been committed and that the accused committed it and, therefore, that probable cause exists for the issuance of a warrant for the arrest of the above-named accused.

Date and Signature Middletown	Signed at (City or town)	On (Date) 5-19-22	Signed (Judge/Judge Trial Referee) <i>Julia Dawney</i>	Name of Judge/Judge Trial Referee Julia Dawney
---	--------------------------	-----------------------------	---	--

EXHIBIT 2

ARREST WARRANT APPLICATION

JD-CR-64a Rev. 10-10
C.G.S. § 54-2a
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT
SUPERIOR COURT
www.jud.ct.gov

Name (Last, First, Middle Initial) Moore, Dean (12/22/1989)	Residence (Town) of accused Higganum	Court to be held at (Town) Middletown	Geographical Area number 9
---	--	---	--------------------------------------

Affidavit - Continued

Aries and that a puppy from Shadow's litter appeared to be injured. Muller contacted Moore about the injured puppy and taking it to the vet. Moore refused and told Muller to "let nature take its course".

3. On April 24, 2022, ACO Kowalski responded to the home and made contact with Dana and Donna Mamangun. The Mamangun's stated that Moore had requested that they bury the two dead puppies in the back yard which they did. Pictures of the dead puppies, taken by Muller and sent to this affiant, show trauma to the head and neck area. Dana Mamangun brought the injured puppy to Pieper Olsen Hospital in Middletown without Moore knowing. Because the puppies were separated from their mothers, Moore was contacted by the ACO Kowalski and explained that the puppies need to be in a warm, dry and clean environment which, in the current situation was not going to happen. A foster home was found and all thirteen remaining puppies were brought there. It was also during this conversation that Dana, who was also a party to the conversation, was instructed by Moore to bring the injured puppy back home. Dana refused this request and later, Pieper Olsen Animal Hospital staff, was advised to euthanize the puppy by Moore.

4. Late afternoon on April 29, 2022, Affiant DellaRocco was contacted by a Dan Secondino of Clinton, CT. Secondino stated that he was fostering thirteen (13) German Shepherd puppies ages approximately four (4) to five (5) weeks old. Secondino is concerned that the puppies are having medical issues such as very loose stool, worms, and being very lethargic. Secondino explained to this Affiant that on April 25, 2022, he was asked by one of the caretakers to house, with permission of the Haddam Animal Control Officer, some German Shepherd puppies because their mothers, two separate litters, had injured/killed some of the other litter mates. Affiant DellaRocco did respond to the home and noticed that all thirteen (13) puppies were showing signs of having either Giardia and/or Parvo and that they all were very lethargic. A medical exam of the puppies was conducted by Guilford Vet Hospital on April 28, 2022. The puppies have been identified as having Giardia (parasite) and coccidia (parasite). Both of these parasites are highly contagious. These parasites are contracted by eating or licking feces but both Giardia and Coccidia can be controlled by having a clean dry environment and that cleaning and disinfecting a contaminated area would minimize the transmission of these parasites. Feces of contaminated dogs need to be bagged and discarded in properly away from living and playing area. Feces and urine are seen throughout both the kennel areas and the fenced in outside run. Both ground surfaces are mulch or shredded wood and can not be cleaned and/or disinfected. This is consistent with the lethargic behavior of the puppies and their constant loose stools.

5. On April 29, 2022, Affiant DellaRocco met with Naja Muller at 20 Nedobity Road Higganum CT. The property is located on the east side of Route 9 North. There is a large fenced in area, approximately 40' by 20', which is adjacent to the highway and located on the west end of the property. The fence surrounding this area was made of wood and at certain points measured less than four feet

(This is page 2 of a 6 page Affidavit.)



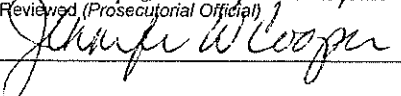
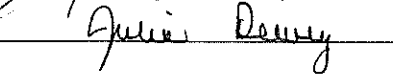
Date 5/18/2022	Signed (Affiant)  #7
Jurat Subscribed and sworn to before me on (Date) 18th 1 May 2022	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) 
Reviewed (Prosecutorial Official) 	Date 5/18/22
Reviewed (Judge/Judge Trial Referee) 	Date 5-19-22

EXHIBIT 2

ARREST WARRANT APPLICATION

JD-CR-64a Rev. 10-10
C.G.S. § 54-2a
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT
SUPERIOR COURT

www.jud.ct.gov

Name (Last, First, Middle Initial) Moore, Dean (12/22/1989)	Residence (Town) of accused Higganum	Court to be held at (Town) Middletown	Geographical Area number 9
---	--	---	--------------------------------------

Affidavit - Continued

in height. The wood slats were long which made them very flimsy and unreliable. There was numerous patch jobs around the perimeter and nails and screws sticking out which could cause injury to people or animals. There is an electric fence, one that would be used for horses, going around the inside of the top rail of the fencing. The electric fencing was not working even though it was plugged in. There was adequate shelter for the three dogs. It was at this time that Muller stated one of the dogs were missing and that earlier in the day there were four dogs in the pen. To the east of the home were eight (8) outdoor kennels. There were four (4) kennels (approximately 4' X10') on one side and four (4) kennels on the other side separated by a large fenced in area (approximately 16' X 16'). The doors to the kennels faced inward. There were seven (7) dogs located in these kennels. There is no way to properly clean and disinfect the runs. Both the kennel area flooring and the outside run area flooring are mulch/shredded wood. Wood and dirt an not be cleaned or disinfected, nor are they impervious surfaces. There was feces and urine located through out both areas. These kennels appeared to be new. Each kennel had a medium size igloo doghouse. Two adjacent kennels on the southeast side were damaged by the two dogs attempting to get at each other. Plywood has been erected but this is doing very little and it appears that these dogs are extremely stressed. Through my training and experience dogs show stress in many different ways such as shaking, yawning, and pacing back and forth. All of these indications were observed by all dogs present. There was food stored in a large two story shed. The food consisted of five (5), fifty (50) pound bags of dog food and an open bag that was more than halfway full. This does not appear to be enough food to sustain the dogs until June 1, 2022. It is my opinion that this food would be gone in less than two weeks. No arrangements were made to have food delivered or picked up.

6. Muller explained to Affiant DellaRocco that when she arrived on April 18, 2022, the four outside kennels on the north side were actually two kennels because a small door was opened within the kennel to allow for it to be bigger for the moms and their litters. One of these kennels had Aries and her ten (10) puppies in it along with an adult dog named Olive. The second kennel had Shadow with her nine (9) puppies. The overnight temperatures were freezing or below and the igloo dog house is not large enough to house an adult dog with a large litter. Muller explained that on the evening of April 22, 2022 she arrived began to feed Shadow first. While doing so, she noticed two lifeless puppies in Aries cage and went to investigate. While doing so, Aries and Olive exited the kennel and Aries got into Shadows kennel grabbing one of the puppies. Muller intervened but the puppy was injured bleeding from the mouth. Muller contacted Moore who was upset about the loss of money for the two deceased puppies and told her to leave the injured puppy and "let nature take its course". Dana and Donna Mamangun were called and took over the situation for the rest of the weekend. Upon her return on Monday April 25, 2022, Muller noticed that Olive had been moved, by Dana Mamangun, to the large pen and that ten puppies were placed in the garage in a kiddie pool. Aries was left alone in her kennel and Shadow had three puppies with her. The ten (10) puppies moved to the garage were left alone over night and shivering from the cold. These puppies were moved to a foster home for care. Muller

(This is page 3 of a 6 page Affidavit.)


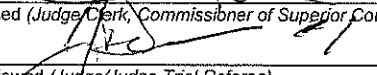
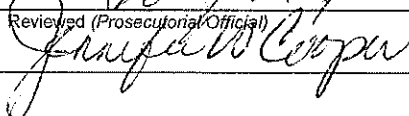
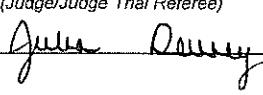
Date 5/18/2022	Signed (Affiant)  #7
Jurat Subscribed and sworn to before me on (Date) 18 May 2022	Signed (Judge/Clerk, Commissionner of Superior Court, Notary Public) 
Reviewed (Prosecutorial Official) 	Date 5/18/22
Reviewed (Judge/Judge Trial Referee) 	Date 5-19-22

EXHIBIT 2

ARREST WARRANT APPLICATION

JD-CR-64a Rev. 10-10
C.G.S. § 54-2a
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT
SUPERIOR COURT

www.jud.ct.gov

Name (Last, First, Middle Initial) Moore, Dean (12/22/1989)	Residence (Town) of accused Higganum	Court to be held at (Town) Middletown	Geographical Area number 9
---	--	---	--------------------------------------

Affidavit - Continued

states that the next day or two she observed that Shadows puppies had stopped nursing and so these puppies were moved to foster care as well. Muller's final statement to Affiant DellaRocco that she had sent her resignation letter to Moore and that she can not handle the issues at the property.

7. Affiant DellaRocco made contact with Dana and Donna Mamangun. Moore had asked Dana and Donna to help out by taking care of the dogs on the weekend. Dana and Donna admitted that they are not experienced enough dog owners to take care of this many dogs. Dana reconized this very early and because his wife, Donna, is eight months plus (8+) pregnant he has refused to allow her to handle any of the dogs. Dana explained that the injured puppy was taken to Piper Olsen Animal Hospital in Middletown where it was euthanized per order of Moore. Sometime over this weekend, Dana and Donna, noticed that Aries had killed another one of her puppies and that two other puppies were missing. This totaled six puppies had died leaving just thirteen (13) remaining. Dana and Donna confirmed with Affiant DellaRocco that there was a dog missing from the large outside pen and that they believed it to be "Scout". "Scout" is identified as a very large intact male German Shepherd. Dana and Donna had concerns as to them being able to give proper care and that they are now just really reacting to situation after situation. It appears that there is not enough dog food because Moore isn't expected to be back until June 1, 2022.

8. Because Affiant DellaRocco was worried about the three dogs remaining in the poorly constructed enclosure that runs directly along side Route 9 north. The fact that one dog is already missing from this enclosure, the proximity of the highway, and the failure to properly supervise the dogs, they were taken into protective custody for the prevention of animal cruelty. Three dogs were taken. Olive, a medium size female appeared to be sick. She was was cowering in the corner and was lethargic. Athena, large female appeared to be pregnant (confirmed later by Moore) and Jagger, a large intact male. Madison Animal Control Officer Elizabeth Amendola came out to the scene to assist in the transport of these three dogs. They were taken to the Town of Clinton Dog Pound. The Town of Madison shares the same dog pound with the Town of Clinton.

9. At approximately 8:00 pm on April 29, 2022, Affiant DellaRocco made contact with Dean Moore over the phone. Moore confirmed that he was out of the country and that he is twelve (12) hours ahead. It was explained to Moore that three of this dogs were taken into custody for the prevention of animal cruelty because there was a concern that they can easily get out of the poorly erected fencing. Moore disagreed but understood. Moore was asked what his plan is to take care of the dogs because Muller had resigned. Moore didn't have one and it was explained that it is his responsibility to find a suitable pet sitter or to get a commercial kennel. Moore stated that he will have to ask around. Moore was asked about why the litters were left outside with their mothers and not placed in a warm, safe, low stressed environment. His response was that the trip to the Philippines was long over due because of covid and he didn't think he did anything wrong. It was agreed that another conversation was to

(This is page 4 of a 6 page Affidavit.)



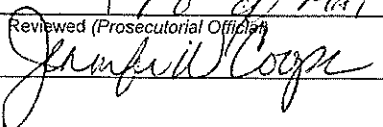
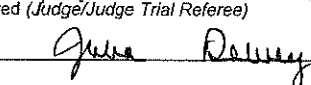
Date 5/18/2022	Signed (Affiant)  #7
Jurat Subscribed and sworn to before me on (Date) 18th of MAY 2022	Signed (Judge/Clerk/Commissioner of Superior Court/Notary Public)  #1
Reviewed (Prosecutorial Official) 	Date 5/18/22
Reviewed (Judge/Judge Trial Referee) 	Date 5.19.22

EXHIBIT 2

ARREST WARRANT APPLICATION

JD-CR-64a Rev. 10-10
C.G.S. § 54-2a
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT
SUPERIOR COURT

www.jud.ct.gov

Name (Last, First, Middle Initial) Moore, Dean (12/22/1989)	Residence (Town) of accused Higganum	Court to be held at (Town) Middletown	Geographical Area number 9
---	--	---	--------------------------------------

Affidavit - Continued

happen twenty four hours later with hopes that a plan is in place.

10. At approximately 7:30 pm on April 30, 2022, Affiant DellaRocco and Moore had another phone conversation. Moore stated that he had spent \$11,000.00 to get a plane ticket back to the US for May 11, 2022 and that he has asked his friend Marc Pononion, with unknown animal care experience, to take care of the dogs. Moore explained that Pononion can only do it one time a day and I explained that this would be unacceptable. The dogs should not be left outside in these kennels without any supervision. They are large strong dogs and some of them are constantly damaging the fencing. This Affiant called Marc Pononion, Moore provided his phone number in a text, but there was no answer. A message to call this Affiant was left but no returned call was ever received. It was also explained to Moore that there was not enough food remaining.

11. Affiant DellaRocco was concerned about the well being of all the remaining dogs on the property. Three dogs are of major concern. Because of the abrupt taking of the puppies and because it is impossible to disinfect the runs, mastitis is a concern for Aries and Shadow. There was evidence that Covid, a large female German Shepherd mix, has some issues because it appears she is very underweight. Affiant DellaRocco was advised by all three caregivers that some of these dogs have medication in the shed but that they were not informed to distribute them. Because of these concerns as well as no apparent caregiver Monday thru Friday starting on Monday May 2, 2022, a search and seizure warrant was applied for and granted by Judge Norma I. Sanchez-Figueroa. The warrant was executed on May 2, 2022 and all seven dogs were seized.

12. Higganum Veterinarian Hospital supplied this Affiant vet records under the name of Dean Moore. There were no vet records for Shadow, Odin, Athena and Jagger. This indicates that these dogs are not vaccinated for rabies as required by law. All other remaining dogs appeared to be current on rabies vaccination. It should be noted that Scout, the missing canine, also did not have vet records and is still missing. Olive's vet record shows that she was presented to Higganum Vet on February 22, 2022 to be vaccinated for rabies. Her temperature was 105.2 degrees. Dogs normal temperature is 100 to 102.5 degrees. Because it was so high, she was never given a rabies vaccination and blood work was drawn. Olive was diagnosed with Lyme disease. Olive was issued a twenty-eight (28) day supply of 300 mg tablets of doxycycline. Olive was presented again to Higganum Vet on March 19, 2022 where it was reported by Moore that the medication was finished. Olive had a temperature of 103.2. Muller explained to Affiant DellaRocco verbally as well as presenting a picture, that the doxycycline pill bottle for Olive was still full. Suggesting that the medication was never given to Olive. As stated above, Affiant DellaRocco, was concerned about Olive's appearance on April 29, 2022. Olive was presented to Clinton Veterinarian Hospital on May 4, 2022. Olive's temperature was again 103.2 and again she tested positive for Lyme. Olive is being treated for Lyme. It has also come to this Affiant's attention that Moore has not licensed the dogs with the Town of Haddam.

(This is page 5 of a 6 page Affidavit.)

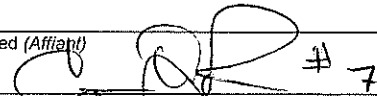

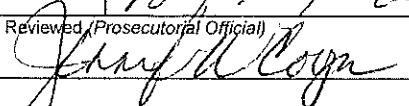
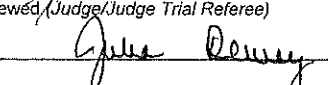
Date 5/18/2022	Signed (Affiant)  # 7
Jurat Subscribed and sworn to before me on (Date) 18th May 2022	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) 
Reviewed (Prosecutorial Official) 	Date 5/18/22
Reviewed (Judge/Judge Trial Referee) 	Date 5.19.22

EXHIBIT 2

ARREST WARRANT APPLICATION

JD-CR-64a Rev. 10-10
 C.G.S. § 54-2a
 Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT
 SUPERIOR COURT

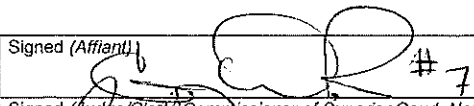
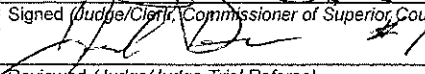
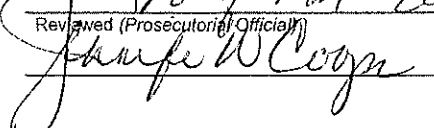
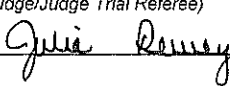
www.jud.ct.gov

Name (Last, First, Middle Initial) Moore, Dean (12/22/1989)	Residence (Town) of accused Higganum	Court to be held at (Town) Middletown	Geographical Area number 9
---	--	---	--------------------------------------

Affidavit - Continued

13. Based upon the above facts and circumstances, this affiant assert that there is probable cause to believe that on and before April 18, 2022, Dean Moore (DOB 12/22/1989) of 20 Nedobity Road, Higganum did commit twenty counts (19 for the puppies left in the cold and 1 for Olive) of the crime of Animal Cruelty in violation of CGS 53-247 and respectfully request a warrant be issued.

(This is page 6 of a 6 page Affidavit.)

Date 5/18/2022	Signed (Affiant)  #7
Jurat Subscribed and sworn to before me on (Date) 18th of May 2022	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)  #1
Reviewed (Prosecutor/Official) 	Date 5/18/22
Reviewed (Judge/Judge Trial Referee) 	Date 5.19.22