

March 6, 2023

**OFFICE OF THE HEARING EXAMINER
KING COUNTY, WASHINGTON**

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REPORT AND DECISION

SUBJECT: Regional Animal Services of King County file nos. **V22013513 and V22013514**

GARY SULLIVAN AND FARIBA DANESHGARAN

Animal Services Enforcement Appeal

Activity no.: A22004734

Appellants: Gary Sullivan and Fariba Daneshgaran
represented by **Adam Karp**
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FINDINGS AND CONCLUSIONS:

Overview

1. Gary Sullivan and Fariba Daneshgaran appeal both a violation notice designating their dog (Roxy) vicious for a third time and an order to remove Roxy. After hearing witness testimony and observing demeanor, studying the exhibits admitted into evidence, and considering the parties' arguments and the relevant law, we deny their appeals but reduce the penalty, clarify the removal's geographic extent, and extend the compliance window.

Background

2. On January 29, 2022, following a January 9 incident, Animal Services issued Mr. Sullivan a violation notice (V22012884-A22000416) for his dog, Roxy, qualifying as vicious and needing to be confined. Ex. D26-003.
3. On April 4, 2022, following a March 27 incident, Animal Services issued Mr. Sullivan another violation notice (V22013058-A22001544), for Roxy again qualifying as vicious and needing to be confined. Ex. D27-001.
4. Mr. Sullivan appealed both violations. On July 7, 2022, the parties signed a settlement agreement, with Mr. Sullivan dismissing his appeals (meaning the violation notices and confinement orders remained) and Animal Services reducing the monetary penalties and agreeing not to take any further action related to the January 9 or March 27 incidents, unless there was future activity. Ex. D18. The following day we dismissed as moot the V22012884 and V22013058 appeals, pursuant to the terms of that settlement agreement. Ex. D29.
5. On September 8, 2022, following a September 1 incident, Animal Services issued Mr. Sullivan another violation notice for Roxy qualifying again as vicious (V22013513-A22004734), along with an order to remove Roxy from King County (V22013514-A22004734). Ex. D2. Mr. Sullivan timely appealed. Ex. D30.
6. We held a hearing on February 13.

Hearing Testimony

Testimony of Kevin Collins

7. Kevin Collins testified that they live next door to the Sullivan/Daneshgaran household.
8. Mr. Collins was not present at the January 2022 incident. Mr. Collins' understanding is that his 12-year-old son was walking their dog, Klaus, when Roxy broke her leash and attacked Klaus. The son's arm was also bitten. The attack took place in the street in front of the Collins's driveway. Mr. Collins took Klaus to the vet. Ms. Collins brought their son to the emergency room; the son had puncture wounds but did not receive stitches. The son did not know with certainty which dog bit him. Mr. Collins and Mr. Sullivan later emailed each other about the incident. Ex. D33.
9. Mr. Collins also was not present for the September 2022 incident. He learned about it from his older son and from reviewing security camera footage. In the videos, Mr. Collins can see Roxy chasing and attacking Klaus outside her yard and see the lawn keepers intervene. Ex. D18. Klaus had bite marks on the back of his head. Exs. D6-D8. Nothing happened to the son during that incident. The incident occurred about a house and a half down on his street. Klaus did not require vet treatment.

10. The Collins family is the most impacted by Roxy, since there are now two incidents involving Roxy, his sons, and Klaus.¹ They are worried about Roxy getting loose again and are living in fear of them or Klaus again being attacked.

Testimony of David Leake

11. David Leake testified that on September 1 he had just finished a landscaping job with his son, Graham Leake, at the end of the cul-de-sac. They were sitting in their truck, facing the cul-de-sac. He noticed a boy [Mr. Collins's son] walking a dog [Klaus] on a leash. He then noticed another German shepherd [Roxy] behind them in a stealth, stalking mode. Roxy then took off towards the boy and Klaus.
12. Graham took off towards the dogs, while David went to grab a tool to help separate the dogs if there was a fight. David first picked up a pitchfork, and then instead grabbed a shovel. David was concerned about his own son (Graham). As David started walking towards the dogs, it appeared that Graham had already separated the dogs. By the time David got to the dogs, Graham had gotten the situation under control.
13. David Leake did not view the actual dog fight. David stood between the dogs to be a visual block, because Roxy was still "ready to go." He asked the boy to bring Klaus home, so they could release Roxy. He saw another dog get out of [the Sullivan] yard, so Graham shooed the dogs into the yard and latched the gate. Roxy showed no interest in either of the Leakes; she was just focused on Klaus.

Testimony of Graham Leake

14. Graham Leake testified that he saw Mr. Collins's son walking Klaus on a leash. He saw Roxy in a stalking or prowling manner, and then began running towards Klaus and the boy. Graham ran towards the dogs. When Graham got to the dogs, Roxy was biting the back of Klaus' neck and head. Klaus was whining and whimpering. Graham went for Roxy's head to try to remove her mouth from Klaus. Since Roxy was not aggressive towards Graham, he straddled her and grabbed behind her front legs and around her neck/chest to firmly secure her. The boy was able to move Klaus away.
15. Graham knew Roxy still wanted to engage Klaus because Roxy was putting forward tension, with active muscles, to get back to Klaus. The Leakes did not know where Roxy came from, so Graham told the boy to put Klaus inside, which he did. Graham then released Roxy, and she went into a fenced yard. He then secured the gate closed. When Graham viewed the video at hearing, he remembered that Roxy was being vocal. Ex. D18.

Testimony of Fariba Daneshgaran

16. Fariba Daneshgaran testified that she lives next door to the Collinses. She adopted a husky mix, Zeke, in fall 2020. She adopted Roxy in October 2021. The vet believed Roxy was about six years old when they adopted her. The prior owner adopted Roxy from a

¹ Roxy's March 2022 attack was on a dog owned by a different neighbor. Ex. D26–002.

shelter when she was about five years old and said he could run Roxy without a leash. The previous owner had to move, so Ms. Daneshgaran agreed to foster Roxy until she could find Roxy a permanent home. From the first day, Roxy and Zeke got along very well. When Roxy first arrived, Roxy was depressed, overweight, and her nails were long. Ms. Daneshgaran and her husband fell in love with Roxy, so they decided to adopt her.

17. Since the Collinses adopted Klaus around the same time as Ms. Daneshgaran adopted Zeke, they decided to have playdates with the dogs. Zeke is friendly, and he always wanted to play with Klaus. However, Klaus was not friendly and was aggressive towards Zeke. Ms. Daneshgaran was nervous about the two dogs playing together. One time in front of the Collins' house, Ms. Daneshgaran saw that Zeke wanted to play with Klaus, but Klaus attacked Zeke. Zeke then defended himself, and the dogs got in a fight. Ms. Daneshgaran invited Klaus and Ms. Collins to her side yard to see if Klaus would react differently towards Zeke. Klaus again attacked Zeke. Ms. Daneshgaran and Ms. Collins decided that it was not a good idea to allow Zeke and Klaus to play together.
18. On January 9, 2022, Ms. Daneshgaran was recovering from a hip surgery, which made walking difficult; Mr. Sullivan was in bed with Covid. Their backyard was very muddy because it had been very rainy, and they were getting work done. Since it was difficult for Ms. Daneshgaran to take the dogs out to go to the bathroom, she put them on tethered leashes in the front yard. Ex. D26-023. The leash closer to the door was Roxy's. Ex. D26-024. Zeke was in the front yard and Roxy was just inside the front door, which was open.
19. Ms. Daneshgaran heard Zeke barking, and then she saw Roxy take off through the front door. She then heard a commotion, so she went to the front door. She saw Klaus and Roxy fighting. She ran towards the dogs. Neither dog was attacking the Collins's son, who was walking Klaus. Ms. Daneshgaran told the son to drop the leash. She then told Roxy to stop. Roxy did, and Ms. Daneshgaran grabbed her collar. She asked the boy if he was okay, and he seemed shocked, but he nodded his head.
20. Ms. Daneshgaran brought Roxy home and Klaus went to his house. About fifteen minutes after the incident Ms. Collins called Ms. Daneshgaran. Ms. Daneshgaran told Ms. Collins to send her a vet bill if there was one. Mr. Sullivan called the Collinses to ask about their son. Ms. Collins said that her son's leg and arm were hurt, but she believed most of the injury was from her own dog. Ms. Daneshgaran paid the medical bill for the Collins's son and vet bill for Klaus. Mr. Collins also sent an email.
21. After the incident with Klaus, Roxy became reactive towards dogs. When a small dog barks, Roxy becomes agitated and wants to lunge. Roxy's trainer told Ms. Daneshgaran that if Roxy does that, walk her backwards and give her treats.
22. In March 2022, Ms. Daneshgaran still had leg pain and Mr. Sullivan had back pain. They were walking Roxy on a different street. Roxy saw a small dog and got excited and wanted to lunge at it. Ms. Daneshgaran gave Roxy treats and started to walk Roxy backwards to distract her. Ms. Daneshgaran asked the girl walking the small dog to not walk in front of Roxy. The girl walked her dog past them, but then came back on the

same side of the street as Roxy. Roxy got even more excited and started lunging towards the small dog, which caused Ms. Daneshgaran to release her hold of the leash. Roxy attacked the small dog. Ms. Daneshgaran immediately separated the dogs.

23. A neighbor came out and examined both dogs and thought both dogs were fine. Ms. Daneshgaran gave the girl her address and asked her to tell her mother to come to her house. The mother accidentally first went to the Collins house. The mother then spoke with Ms. Daneshgaran. The small dog had a small puncture wound, and Ms. Daneshgaran paid the two veterinary bills. Ms. Daneshgaran believes that Mr. Collins initially reported this incident.
24. Ms. Daneshgaran's mother passed towards the end of August, and she hosted a memorial for her mother at the house the evening of August 31. Around fifty guests were expected, so Roxy and Zeke stayed with a family friend that evening. That way Ms. Daneshgaran could leave the gate open for guests during the memorial. After the memorial, Ms. Daneshgaran asked her house helper to lock the door. Ms. Daneshgaran thought Mr. Sullivan padlocked the gate. Her friend brought Roxy and Zeke back at 1:00 AM.
25. The next morning Ms. Daneshgaran did not double check the padlock before letting Roxy out, because she was still under a lot of stress and was still grieving. Mr. Sullivan also had surgery prior to the memorial and was still recovering. Ms. Daneshgaran was in her living room drinking tea when one of the Collins boys rang her doorbell. He said that Roxy just attacked Klaus. He said that he and Klaus were okay, and he asked if Roxy was okay. Ms. Daneshgaran checked Roxy and she looked okay. She then checked the gate, which was closed but not padlocked.
26. A trainer with Rock Star Dogs has worked with Roxy. Ex. A6. Ms. Daneshgaran has abided by her advice. Ms. Daneshgaran put padlocks on the gate as soon as the fence was finished, because their trainer told them the latch was not enough security. Ex. A7-003. They added wired mesh around the whole fence to prevent the dogs from digging. Ex. A8-003. They also put artificial grass in the backyard, so it does not get muddy.
27. Ms. Daneshgaran uses a leash and muzzle when she walks Roxy. Ex. A2. Roxy's trainer advised Ms. Daneshgaran to use the muzzle. Since Roxy and Klaus are both territorial, Ms. Daneshgaran drives Roxy to a different neighborhood and walks her there. She has been doing this since September. She also walks Roxy and Zeke separately. She does not take Roxy to dog parks. Roxy has been exposed to many people at her house. Since working with trainers, Ms. Daneshgaran has seen a huge improvement with Roxy's reactivity towards small dogs.
28. Roxy is like a daughter to Ms. Daneshgaran. She used to be terrified of dogs, but now she is no longer afraid. She is afraid of Klaus attacking her or Zeke.

Testimony of Gary Sullivan

29. Gary Sullivan testified that Roxy is extremely sweet. In some ways, Roxy is better behaved than Zeke. Roxy is good company for Zeke. Roxy completes their household. Mr. Sullivan has a strong bond with Roxy.
30. Mr. Sullivan spoke with people who live outside the jurisdiction, and he has been unable to find a place to rehome Roxy if she is ordered removed. He has called a few shelters and rescues, and they said most places are not willing to take a vicious animal. They also said that she might not do well in a shelter, because it would be rehoming her again. Her reactivity to other dogs would also make that difficult. Mr. Sullivan contacted or tried to contact three organizations about rehoming Roxy. He spoke with a shelter near their home and outside the area. He also spoke with a neighbor who runs a rescue.
31. Mr. Sullivan believed that euthanizing Roxy was the only option because he cannot find a place to rehome her. He asked the vet about euthanasia because he thought it might be the only option. Ex. A3.
32. Mr. Sullivan testified that his fences are six feet tall. Ex. A8-001. He added a baby gate near the gate to their side yard that is near the Collins property, to keep Roxy away from there. Ex. A7-001. They also put up a gate inside their house by their front door. Ex. A9. He plans on completing further training with Roxy. Roxy is older and she is not able to jump or dig. He is more concerned about Zeke jumping or digging. Roxy weighs about 70 pounds.
33. Mr. Sullivan was present for the March incident. The other dog came close and then came closer. He tried to distract Roxy, but it did not work.
34. Regarding the September incident, Mr. Sullivan became aware that Roxy got out after his wife told him. He was either working or resting at the time of the incident. He was not in the best physical condition because he was recovering from a surgery. He was not aware that the padlock was not secured from the previous night. He sent a text to Ms. Collins. Ex. A1-002.

Legal Standards

35. In V22013513, does Roxy again qualify as vicious, defined as, “performing the act of... endangering the safety of any person, animal or property of another, including, but not limited to, biting a human being or attacking a human being or domesticated animal without provocation,” with “[a]ny animal that has exhibited vicious propensities and constitutes a danger to the safety of persons or property off the animal’s premises or lawfully on the animal’s premises” qualifying as a nuisance? BCC 8.04.060.BB & .300.H.
36. In V22013514, is removal appropriate under BCC 8.04.370.A.3, which states that:

Failure to comply with any requirement prescribed by the manager in accordance with this section constitutes a misdemeanor. Such an animal shall not be kept in the city of Bellevue after 48 hours after receiving

written notice from the manager. Such an animal or animals found in violation of this section shall be impounded and disposed of as an unredeemed animal and the owner or keeper of the animal or animals has no right to redeem the animal or animals.

37. We do not grant substantial weight or otherwise accord deference to agency determinations. Exam. R. XV.F.3. For those matters or issues raised in an appeal statement, Animal Services bears the burden of proving by a preponderance of the evidence both the violation and the appropriateness of the remedy it has imposed. KCC 20.22.080.G; .210.B.

Analysis

V22013513 (Viciousness)

38. Appellants wisely do not challenge whether Roxy's behavior itself on September 1 again qualified her as vicious. On that day she performed acts endangering the safety of at least Klaus, attacking Klaus without provocation. The video and testimony establish that Klaus did nothing more provocative than simply walking down the street *away* from Roxy. Roxy first started stalking, and then charged at and attacked, Klaus. Exs. D12, D17, D18 & D19. It took a good Samaritan (Graham Leake) to stop Roxy's attack and prying Roxy's teeth from Klaus. And even then Roxy kept trying to get at a leashed Klaus again, with David Leake needing to intervene.
39. And while we occasionally find extenuating circumstances such that a dog that has exhibited a vicious act nonetheless does not constitute a danger to safety, here Roxy was *already* found vicious (part of which included a finding that the animal constitutes a danger) after the January 2022 incident and again after the April 2022 incident. Even if she had not already been found to constitute a danger, we would have found that anew, just from reviewing the September 1 incident.
40. Instead, Appellants' challenge is a legal one, that there was a superseding, intervening cause that resulted in Roxy getting out. Possibly that would apply to a scenario where, say, Roxy was unattended but contained in a fully-fenced yard, padlocked to prevent accidental release, and a tree or a truck crashed through the fence, with Roxy racing through the breach before anyone could respond to the crash. Even that is unclear, because those codes say nothing about an *owner*, inquiring only whether the *animal* performed an act endangering the safety.
41. Regardless, that is not what happened on September 1. Appellants took off the padlock the previous evening to facilitate guests at the memorial service. And Appellants let Roxy back out without double checking that the gate had been re-padlocked. Animal Services has met its burden of proof on V22013513.
42. We do, however, reduce the monetary penalty. Appellants were being generally responsible. It just was not enough to keep Roxy from getting out and attacking again.

V22013514 (*Removal*)

43. Appellants had a duty to keep Roxy contained on the property (or adequately leashed off it). BCC 8.04.370.A.1, dictates that any “animal, declared by [Animal Services] to be vicious, may be harbored, kept or maintained in the city of Bellevue only upon compliance with those requirements” contained, here, in the January 2022 order that included, among other terms.

Secure your animals in a fenced area suitable for the size of the animal when your animal is unattended and outside your home. Lock all passages with a padlock to prevent accidental release.

Exs. D26-003 (underscore added).

44. That did not happen on September 1, when Roxy was let out, unattended, into a yard that was not re-secured with a padlock. As found above, there was no superseding, intervening cause. Appellants failed to meet the compliance term.
45. Yet in our section A.3 removal cases (under Bellevue’s, Tukwila’s, or King County’s parallel codes), we have applied a more nuanced view in reviewing such removal orders. First, A.3 does not simply follow A.1’s pattern and say something like “any animal not harbored, kept or maintained in compliance with [the requirements] shall be removed from the city of Bellevue...”; instead, the drafters linked the failure to comply with a misdemeanor, choosing to inject a criminal law component, with its associated presumptions.² And second, we are most exacting of Animal Services in removal cases.³ So, we apply a more robust analysis than simply that because Roxy violated the confinement order on September 1, removal necessarily follows.
46. One factor we look at is whether the initial altercation that drew the vicious designation and compliance order was, relatively speaking, towards the milder end of the viciousness scale. In January 2022, Klaus busted free of his tether and ran into the street to attack Klaus, resulting in veterinary treatment for Klaus and medical treatment and stitches for a 12-year-old boy; although it is somewhat unclear whether Klaus or Roxy bit the boy, Roxy is responsible for perpetrating the attack that resulted in those injuries. And the January event was no outlier; Roxy attacked a different dog two months later, resulting in veterinarian care. This factor cuts in favor of removal.

² Where a criminal statute is ambiguous, the rule of lenity requires tribunal to construe the statute in defendant’s favor. *State v. Manuel*, 14 Wn. App. 2d 455, 461, 471 P.3d 265 (2020).

³ *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976) (nature of private interest impacted is a factor in determining how much process is due); *Repin v. State*, 198 Wn. App. 243, 284, 392 P.3d 1174 (2017) (Fearing, C.J., concurring) (analyzing court decisions recognizing “the bond between animal and human and the intrinsic and an estimable value a companion animal”); *Mansour v. King County*, 131 Wn. App. 255, 265, 128 P.3d 1241, 1246 (2006) (in the context of an order removing a dog from King County, “the more important the decision, the higher the burden of proof”); Exam. R. XII.B.4 (higher standards in proceeding involving divestiture of legally cognizable rights).

47. Sometimes there are only two incidents—one triggering the initial violation and a later failure to comply with that order. Here, Roxy attacked Klaus in January 2022 and another dog in March 2022, before again breaking loose from confinement to attack Klaus in September 2022. Conversely, Appellants had taken significant steps before September, and have taken significant steps since then, to contain Roxy; they are generally responsible owners. This factor is neutral, perhaps even slightly cutting against removal.
48. However, the third factor cuts strongly in favor of removal. Sometimes, after receipt of a viciousness designation and compliance order, a dog, say, gets loose and wanders the neighborhood, thus violating the containment requirement but not actually doing anything aggressive while out. September 1 was the opposite. Roxy stalked, and then charged at and attacked, a dog several houses away, including biting the back of Klaus’s head. It took a good Samaritan to get Roxy’s mouth from Klaus’s head, and then to restrain Roxy from attacking again.
49. We understand the strong bond Appellants have with Roxy. They are good people, and we empathize with their situation. Yet the Collins family have been living in fear of the violent dog next to them. Weighing the factors we review in an A.3 removal, even against the heightened scrutiny we apply, we uphold Roxy’s removal order. We make two adjustments.
50. While Mr. Sullivan discussed trying to find placement for Roxy outside of King County, where we uphold a removal order, we require the animal only be removed from jurisdiction where the same legal standard applies and where Animal Services (and we as the reviewing tribunal) have authority. Thus, Roxy need not be removed from all of King County, only from unincorporated King County and from the contract cites listed below.⁴ We do not know, for example, how a place like Kirkland would treat Roxy’s situation, but if Appellants rehomed Roxy in Kirkland, that would comply with the removal order.⁵
51. Second, Mr. Sullivan explained his challenges finding a suitable place for Roxy. Rehoming a dog with a violent past is undoubtedly more challenging than for a dog, say, removed because it has too many noise violations. BCC 8.04.370.B.1. We will provide Appellants with 45 days to find a new home for Roxy or to surrender Roxy.

⁴ In addition to unincorporated King County, the contract cites where the same legal standard applies are currently:


A.	Beaux Arts Village	B.	Bellevue	C.	Black Diamond
D.	Carnation	E.	Clyde Hill	F.	Covington
G.	Duvall	H.	Enumclaw	I.	Issaquah
J.	Kenmore	K.	Kent	L.	Lake Forest Park
M.	Maple Valley	N.	Mercer Island	O.	Newcastle
P.	North Bend	Q.	Redmond	R.	Sammamish
S.	SeaTac	T.	Shoreline	U.	Snoqualmie
V.	Tukwila	W.	Woodinville	X.	Yarrow Point

⁵ Kirkland does not employ the designation “vicious”; instead, it uses the two-tier, “potentially dangerous” and “dangerous” designations. K(irkland)CC 8.09.120(10) & (34).

DECISION:

1. We uphold Roxy's latest viciousness designation (V22013513) but halve the penalty to \$500.
2. We uphold Roxy's removal order (V22013514). By **April 20, 2023**, either:
 - A. Find a potential new owner outside of unincorporated King County and outside the cities that contract with Animal Services, disclose to that person that Roxy was ordered removed as a threat to public safety, have that person agree to take Roxy on, actually get Roxy out, and provide Animal Services both proof that this new owner lives outside unincorporated King County and those contract cities and the new owner's contact information; or
 - B. Surrender Roxy to Animal Services.
2. If Appellants successfully meet A. or B. and thereafter do not allow Roxy to return to King County or one of those contract cities, the \$1000 penalty attached to the removal order is waived. If not, the \$1000 penalty is reinstated and Animal Services may impound Roxy as an unredeemable animal.

ORDERED March 6, 2023.



David Spohr
Hearing Examiner

NOTICE OF RIGHT TO APPEAL

King County Code 20.22.040 directs the Examiner to make the County's final decision for this type of case. This decision shall be final and conclusive unless appealed to superior court by *April 5, 2023*. Either party may appeal this decision by applying for a writ of review in superior court in accordance with chapter 7.16 RCW.

**MINUTES OF THE FEBRUARY 13, 2023, HEARING IN THE APPEAL OF GARY
SULLIVAN, REGIONAL ANIMAL SERVICES OF KING COUNTY
FILE NOS. V22013513 & V22013514**

David Spohr was the Hearing Examiner in this matter. Participating in the hearing were Kevin Collins, David Leake, Graham Leake, Fariba Daneshgaran, and Gary Sullivan. A verbatim recording of the hearing is available in the Hearing Examiner's Office.

The following exhibits were offered and entered into the record by Animal Services:

Exhibit no. D1	Regional Animal Services of King County staff report to the Hearing Examiner
Exhibit no. D2	Notice of violation no. V22013513-A22004734, issued September 8, 2022, and Notice and order for removal no. V22013514-A22004734, issued September 8, 2022
Exhibit no. D3	Kevin Collins's statement, dated September 1, 2022
Exhibit no. D4	David Leake statement
Exhibit no. D5	RASKC investigation report no. A22004734
Exhibit no. D6	Photograph
Exhibit no. D7	Photograph
Exhibit no. D8	Photograph
Exhibit nos. D9-D25	Videos
Exhibit no. D26	Records relating to January 9, 2022, incident
Exhibit no. D27	Records relating to March 27, 2022, incident
Exhibit no. D28	Settlement agreement for January 9 and March 27 incidents
Exhibit no. D29	Hearing Examiner's dismissal order of appeal of prior incidents
Exhibit no. D30	Ms. Sullivan's appeal relating to the September 1, 2022, incident
Exhibit no. D31	Summarization of Event (Parker Collins)
Exhibit no. D32	Response to Sullivan's Letter Regarding Removal
Exhibit no. D33	Email conversation between Mr. Collins and Ms. Daneshgaran

The following exhibits were offered and entered into the record by Animal Services:

Exhibit no. A1	Texts
Exhibit no. A2	Photo of Roxy
Exhibit no. A3	Patrick Miles, DVM letter on email letterhead
Exhibit no. A4	Settlement agreement with RASKC
Exhibit no. A5	Proof of \$500 payment per settlement agreement
Exhibit no. A6	Kat McCarter Declaration
Exhibit no. A7	Photographs of Sullivan-Daneshgaran gate (3 images)
Exhibit no. A8	Photographs of Sullivan-Daneshgaran back yard (6 images)
Exhibit no. A9	Photograph of inside Sullivan-Daneshgaran home
Exhibit no. A10	Brief

March 6, 2023

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CERTIFICATE OF SERVICE

SUBJECT: Regional Animal Services of King County file nos. **V22013513 and V22013514**

GARY SULLIVAN AND FARIBA DANESHGARAN

Animal Services Enforcement Appeal

I, Lauren Olson, certify under penalty of perjury under the laws of the State of Washington that I transmitted the **REPORT AND DECISION** to those listed on the attached page as follows:

EMAILED to all County staff listed as parties/interested persons and parties with e-mail addresses on record.

placed with the United States Postal Service, with sufficient postage, as FIRST CLASS MAIL in an envelope addressed to the non-County employee parties/interested persons to addresses on record.

DATED March 6, 2023.



Lauren Olson
Legislative Secretary

Collins, Kevin/Xander

Hardcopy

Eykel, Chelsea

Regional Animal Services of King County

Fariba Daneshgaran, Gary Sullivan

Hardcopy

Isaacson, Mari

Prosecuting Attorney's Office

Karp, Adam

Animal Law Offices of Adam Karp

Hardcopy

Leake, David/Graham