

AFFIDAVIT

Now comes Heather Harper-Troje (AKA Heather Turner) and, after being duly sworn, avers to the following to the best of her knowledge, information and belief:

1. From August 1999 until March 2000 I was employed full time by People for the Ethical Treatment of Animals, Inc. ("PETA").
2. I was employed in PETA's program known as the Community Animal Project.
3. I was employed at PETA's facility in Norfolk, Virginia.
4. While employed at PETA, my primary responsibilities included gaining possession of as many cats and dogs as possible, almost all of which were euthanized.
5. The main purpose of the Community Animal Project was to persuade people to surrender their animals, so that PETA could then euthanize the animals.
6. A woman named Erica was my first immediate supervisor, but Ingrid Newkirk was in charge of the Community Animal Project and Ingrid became my supervisor (though a woman named Meagan, formerly my assistant, eventually became supervisor in title Ingrid was always in charge of Community Animal Project).
7. In September or October 1999, while employed by PETA, I trained for a period of weeks at the Washington Humane Society on how to handle animals and how to euthanize dogs and cats.
8. While I was at PETA, a type of indoctrination took place. We were constantly told that there were too many dogs and cats without enough good homes and that the best thing to do was to kill them "humanely."

EXHIBIT 2

9. I was ordered to do whatever I had to do to get custody of the animals and I was instructed to do and say anything I could to induce people to give me possession of their dogs and cats.
10. This included our telling people that PETA would find a good home for their dog and cat when we knew that PETA had no intention of trying to find the animals homes but would instead euthanize them almost immediately.
11. If someone had feral cats on their property, we were told to tell them that we would take them to a feral cat colony, but 100% of the feral cats were euthanized using a method that was very frowned upon by other shelters, such as the Washington Humane Society, because it could cause suffering, but it was the one Ingrid insisted upon using.
12. PETA would focus its efforts mostly in low income neighborhoods because we would get calls from those neighborhoods and people from low income neighborhoods were more likely to relinquish their pets to us.
13. Once in a community, we would try to interact with the neighbors in order to build trust so that we could ultimately get them to hand over their dogs or cats to us. Our objective was to get as many dogs and cats from a neighborhood as possible.
14. We began wearing uniforms that would make us look more official. I was specifically told that the reason we wore the uniforms was that our looking more official increased our chances of people trusting us with their dogs or cats.
15. While I was employed by PETA, PETA would euthanize more than 99% of the animals it obtained as part of the Community Animal Project.

16. Ingrid Newkirk set the policy for the Community Animal Project. Erica told me that PETA was careful not to put things in writing so that it could protect Ingrid and avoid leaving evidence of PETA's practices.
17. Ingrid expressly told me that it was better to kill these animals than have them neglected. She said there were too many dogs and cats without enough good homes so there wasn't any point in trying to adopt out an animal.
18. When I would try to have a particular dog adopted out, Ingrid would get angry at me for wasting time and resources. For example, one time when I told Ingrid I wanted to try to have a particular dog adopted out, she rolled her eyes and asked what made that dog so special.
19. Ingrid said that an effort to adopt out an animal was a waste of PETA's money and effort.
20. As stated previously, I was specifically told by my supervisors at PETA to tell people that we would find good homes for the dogs and cats, even though we knew the animals would be euthanized.
21. I was instructed by Erica to over-estimate the size of the dogs and cats when euthanizing them so that there would be additional drugs that could be used to kill dogs and cats "off the books," meaning that dogs and cats could be euthanized without reporting their deaths to the State. Erica told me these instructions came directly from Ingrid.
22. Over-estimating the size of an animal or its level of distress (an agitated dog requires more drugs be used to euthanize the animal) was a routine practice while I was employed at PETA.

23. Killing animals "off the books," was done so that PETA's kill rate would not look as bad.
24. Erica and Ingrid said that after gaining possession of an animal, it was okay to immediately kill a dog or cat in the van before returning to the PETA facility.
25. Killing dogs and cats in the PETA van on the way back to PETA's facility occurred on a fairly regular basis.
26. PETA's facility was not set up to keep animals overnight and did not have the facilities needed to meaningfully try to have companion animals adopted.
27. The storage shed where an animal could be kept was a room with a stainless steel vet table and supplies such as clinical sedatives and syringes and a storage closet opposite the Community Animal Project office.
28. That shed was where we would euthanize animals that made it back to PETA alive.
29. We obtained a license to carry drugs to euthanize animals in the van. The drugs were located in a fishing tackle box. Ostensibly these drugs were to be used if the animal presented a danger or was dying already, but they were used regularly to expedite the euthanasia process while in route to PETA.
30. Erica made it clear that everything we did was per Ingrid's orders.
31. The other PETA employees in the field were given the same orders as I was given.
32. We were also instructed to offer people dog houses and to bring animals to vets to have them vaccinated and spayed/neutered. This was done to foster trust so that we could ultimately gain possession of the pets and then kill them.

33. If we saw animals loose, even on someone's property, we were to take them whenever we could. PETA would not hold them for five days. We would not obtain signed releases if an animal was stolen, but would euthanize the animals immediately.
34. We would routinely euthanize healthy puppies and kittens and other highly adoptable animals.
35. Sometimes Eric Turner, my husband, on the weekend would come with me to PETA and would hold the puppies and kittens so that I could euthanize them.
36. Attached as Exhibit A is a copy of a performance review I received from PETA. At the time my name was Heather Harper-Troje (Heather Harper-Troje is still my legal name).
37. As I became more vocal against some of these practices, and I tried to have dogs and cats adopted, I was accused of not being a team player. My relationship with Ingrid deteriorated.
38. When it became apparent that I was no longer a "good soldier" and would no longer follow orders to procure animals by whatever means possible, and countered Ingrid during a meeting in which she said we would no longer be neutering pitbulls because it was not good use of money and that I would try to find homes for some dogs, I was dismissed as an employee of PETA.
39. The majority of animals that were taken in by PETA and euthanized while I was employed there were in my opinion highly adoptable.

The foregoing is true and accurate to the best of my knowledge, information and belief.

Heather Harper-Troje (AKA Heather Turner)
Heather Harper-Troje (AKA Heather Turner)

REPUBLIC OF HONDURAS
CENTRAL DISTRICT
CITY OF TEGUCIGALPA
EMBASSY OF THE UNITED
STATES OF AMERICA

~~XXXXXXXXXXXX~~

Subscribed and sworn to before me this 27 th day of February, 2017, before me, a
Notary Public, in the above stated jurisdiction.

Notary Number: N/A

Notary Public

My Commission Expires: Indefinite

Christopher Reyes
Christopher Reyes
Consul of the
United States of America
Tegucigalpa, Honduras



PETA Performance Appraisal

Name: Heather Harper-Troje

Due Date: November 26, 1999

Department: Community Animal Project

Position: Fieldworker

Excellent:	No improvement needed
Good:	Minimal improvement needed
Satisfactory:	Needs moderate amount of improvement
Poor:	Performing inadequately

1. Quantity of Work: Volume of acceptable work, diligence, and consistency.

Score: Good

Comments:

Being a Fieldworker in PETA's Rescue Department entails long hours and a large workload. Heather works late and doesn't complain about the never-ending pile of new complaints and cases that come in. She tackles each one with enthusiasm. However, she seems to cling to ride-alongs, which cuts in half the amount of work we can get done. This needs to change.

2. Quality of Work: Thoroughness, neatness, and accuracy of work.

Score: Good

Comments:

Heather is obviously more comfortable in the field than in the office. She needs to be careful not to allow her paper work to suffer because it can cause a huge problem somewhere down the line when someone challenges an action. Managing her time in a more efficient manner would help her keep on top of her office work as well as her fieldwork. She has to remember that she must not underestimate her ability to find a way to alleviate suffering and must, if necessary, make arrangements to go to a visit after hours if that is when she can speak to the person she needs to contact about an animal. She cares about the animals she comes into contact with and this shows in the way she interacts with them. She conscientiously follows up on her cases but needs to realize she can sometimes tackle them more aggressively (e.g. the beagle and the shelties) when the animals need immediate action.

3. Knowledge of Job: Clear understanding of the tasks pertinent to the job; ability to put this understanding to work.

Score: Good

Comments:

Heather had very little direction or supervision during her first month at PETA. She kept plugging away to the best of her abilities during that time and pulled through. She dealt with the chaos in the office admirably. She went to DCAC and took full advantage of the opportunity to learn how to deal with people in difficult situations as well as gaining valuable experience handling animals. Thanks to what she learned at DCAC, she has become very good at dealing with aggressive animals and a quick but humane hand with a catchpole. She must learn the Virginia and local laws inside and out. She needs to put as much effort into tackling tough cases in which she must find a way to try to succeed for the animal, even when it is difficult, as she does into the easy ones, like give-up collections.

EXHIBIT A

4. Ability to Learn New Duties: Speed with which employee masters new routines, grasps explanations, retains this knowledge and puts it to work.

Score: Excellent

Comments:

Working in Rescue is a continual learning process; there is always something new to learn. Heather picks up new tasks very quickly. She is very proficient at the tasks she has to complete and is always enthusiastic about learning something new. She has done wonderfully training for euthanasia and is on her way to being certified.

5. Cooperation: Ability and willingness to work harmoniously with fellow employees; supervisors, and subordinates; desire to be a "team player" in order to strive toward a common goal.

Score: Good

Comments:

Heather is always willing to do more than her share. She works well with Zoe and Meagan, but has shown some attitude and resistance when it comes to going out in the evenings to resolve cases or to organizing a change in shift. There was some friction between her and Chris for a short time but I think she has done a good job of trying to relieve those tensions. She takes pride in our department and will do whatever it takes to help things run smoothly. She realizes that everyone must be able to work well with each other to keep up productivity.

6. Dependability: Conscientiousness, reliability, punctuality, amount of supervision required with regard to dependability.

Score: Good

Comments:

Everyone in the department knows they can rely on Heather in a pinch. She is reliable and trustworthy. She does better with direction and supervision and knows to ask when she's unsure how to deal with a situation.

7. Public Contact: Employee's concern for public needs; overall courtesy and attitude.

Score: Good

Comments:

Heather works well with most people in the field. She can be good at using different approaches. She is still learning how to properly deal with people in certain situations and we hope her confidence and efforts to try different approaches will continue to improve. Her training at DCAC helped considerably.

8. Initiative: Self-starting; ability to proceed with a minimum of supervisory direction.

Score: Good

Comments:

Heather doesn't hesitate to lend a hand when needed and doesn't hang back from situations in the field. She is great at troubleshooting and always has valuable input and ideas to offer. She is especially adept at dealing with the animals she handles. She doesn't hesitate to approach animals in any situation now. She does need to develop enough confidence that she will not seize every opportunity to be on the road with someone else (unless she recruits a volunteer to go with her), but is out there, pulling her own weight, as an independent part of the team.

Overall Rating: Excellent

Comments (qualify overall rating):

It takes a very dedicated and tough person to do fieldwork. It is a difficult position due to the long hours and frustrating nature of the job. You see countless cases of neglect and cruelty to

animals every day and have to deal with the worst abuse, negligence, ignorance, and lack of understanding of humankind. Heather has the qualities that make a great fieldworker and must learn to feel confident enough in her budding abilities and natural kindness and desire to succeed to push herself even further. She gains experience and knowledge every day and strives to improve her skills. I think that she has greater potential and is already a good friend to animals. We look forward to seeing her continue to grow and succeed in her vital work to relieve animal suffering.

Recommended percentage wage increase: 6.52%, from \$ 23,000.00 to \$ 24,500.00

Approval Date: January 24, 2000

Manager: *M. C. Mc...*

Personnel: *Ann Wilkerson*

President: *[Signature]*

Employee: *Heather [Signature]*

Employee Comments: