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6 SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

7 THE STATE OF WASHINGTON,)
)
8 v.) Plaintiff,) No. 08-1-04267-3 KNT
)
9 DEAN MARIE SOLOMON,) INFORMATION
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10)
11) Defendant.)

12 COUNT I

13 I, Daniel T. Satterberg, Prosecuting Attorney for King County in the name and by the
14 authority of the State of Washington, do accuse DEAN MARIE SOLOMON of the crime of
15 **Animal Cruelty in the Second Degree**, committed as follows:

16 That the defendant DEAN MARIE SOLOMON in King County, Washington, during a
17 period of time intervening between August 19, 2007 through February 19, 2008, did own an
18 animal, to-wit: a thoroughbred quarter horse bay mare 'Kit Kat', and did knowingly, recklessly, or
19 with criminal negligence fail to provide that animal with necessary food, water, shelter, rest,
20 sanitation, ventilation, space, or medical attention and the animal suffered unnecessary or
21 unjustifiable physical pain as a result of the failure;

22 Contrary to RCW 16.52.207, and against the peace and dignity of the State of
23 Washington.

20 COUNT II

21 And I, Daniel T. Satterberg, Prosecuting Attorney aforesaid further do accuse DEAN
22 MARIE SOLOMON of the crime of **Animal Cruelty in the Second Degree**, a crime of the same
23 or similar character and based on the same conduct as another crime charged herein, which crimes

were part of a common scheme or plan and which crimes were so closely connected in respect to time, place and occasion that it would be difficult to separate proof of one charge from proof of the other, committed as follows:

That the defendant DEAN MARIE SOLOMON in King County, Washington, during a period of time intervening between August 19, 2007 through February 19, 2008, did own an animal, to-wit: a thoroughbred quarter horse bay mare 'Natasha', and did knowingly, recklessly, or with criminal negligence fail to provide that animal with necessary food, water, shelter, rest, sanitation, ventilation, space, or medical attention and the animal suffered unnecessary or unjustifiable physical pain as a result of the failure;

Contrary to RCW 16.52.207, and against the peace and dignity of the State of Washington.

COUNT III

And I, Daniel T. Satterberg, Prosecuting Attorney aforesaid further do accuse DEAN MARIE SOLOMON of the crime of **Animal Cruelty in the Second Degree**, a crime of the same or similar character and based on the same conduct as another crime charged herein, which crimes were part of a common scheme or plan and which crimes were so closely connected in respect to time, place and occasion that it would be difficult to separate proof of one charge from proof of the other, committed as follows:

That the defendant DEAN MARIE SOLOMON in King County, Washington, during a period of time intervening between August 19, 2007 through February 19, 2008, did own an animal, to-wit: a thoroughbred chestnut mare 'Ginger', and did knowingly, recklessly, or with criminal negligence fail to provide that animal with necessary food, water, shelter, rest, sanitation, ventilation, space, or medical attention and the animal suffered unnecessary or unjustifiable physical pain as a result of the failure;

Contrary to RCW 16.52.207, and against the peace and dignity of the State of Washington.

COUNT IV

And I, Daniel T. Satterberg, Prosecuting Attorney aforesaid further do accuse DEAN MARIE SOLOMON of the crime of **Animal Cruelty in the Second Degree**, a crime of the same or similar character and based on the same conduct as another crime charged herein, which crimes were part of a common scheme or plan and which crimes were so closely connected in respect to time, place and occasion that it would be difficult to separate proof of one charge from proof of the other, committed as follows:

Daniel T. Satterberg
Norm Maleng Regional Justice Center
401 Fourth Avenue North
Kent, Washington 98032-4429

1 That the defendant DEAN MARIE SOLOMON in King County, Washington, during a
2 period of time intervening between ~~August~~ ^{September} 19, 2007 through February 19, 2008, did own an
3 animal, to-wit: a black Arab male horse 'Lace', and did knowingly, recklessly, or with criminal
4 negligence fail to provide that animal with necessary food, water, shelter, rest, sanitation,
5 ventilation, space, or medical attention and the animal suffered unnecessary or unjustifiable
6 physical pain as a result of the failure;

7
8 Contrary to RCW 16.52.207, and against the peace and dignity of the State of
9 Washington.

10
11 DANIEL T. SATTERBERG
12 Prosecuting Attorney

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14 By: _____
15 Jennifer Lyn Miller, WSBA #31600
16 Deputy Prosecuting Attorney
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Daniel T. Satterberg, Prosecuting Attorney
Norm Maleng Regional Justice Center
401 Fourth Avenue North
Kent, Washington 98032-4429

08 - 1 - 04267 - 3 KNT

CAUSE NO.

CERTIFICATION FOR DETERMINATION OF PROBABLE CAUSE

That David A. Morris is a Sergeant with King County Animal Control and has reviewed the investigation conducted in King County Animal Control case number 08-1401;

There is probable cause to believe that Dean Solomon committed the crime(s) of Animal Cruelty 1st degree, RCW 16.52.205 and Animal Cruelty 2nd degree, RCW 16.52.206.

This belief is predicated on the following facts and circumstances:

On February 20, 2008, Dr. Hanna Evergreen (DVM), was called to provide medical treatment on six (6) horses that belonged to Dean Solomon the previous day. Auburn Code Enforcement ordered Solomon to reduce the number of horses maintained on her Auburn property, located at [REDACTED] SE 288th Street, Auburn, WA. On February 19, 2008, Solomon released six (6) horse to a private rescue organization, Serenity Equine Rescue (SER), operated by Patricia Clark.

Dr. Evergreen, examined the six horses and found them to be in thin to very thin condition and most were infested with lice. Dr. Evergreen concluded that all six of the horses they were suffering from neglect and starvation and in need of medical treatment. The conclusion indicated that the neglect and starvation of the horse caused considerable pain and suffering.

#1 Ginger, a Thoroughbred chestnut mare, came into PEC care and custody in or around November 2006 according to a PEC volunteer, Kirsti Margeson. Using the Henneke Body condition Scoring System, an objective system of determining a horses body fat condition she scored Ginger a 2.5 out of 9, which is considered very thin. Ginger was infested with lice and had neglected hooves.

#2 Melvin, a Thoroughbred chestnut gelding; scored the horse a 3 out 9, thin. His hooves were extremely overgrown and he was foot sore in all four feet. He was infested with lice.

#3 Star aka Parrott, a Thoroughbred bay mare; scored the horse a 3 out of 9, thin. She also found significant dermatitis covering her back consistent with Rain Rot or Scratches.

#4 Aunt Jamima, a Quarter Horse black mare, acquired by PEC in September 2007; scored the horse as a 2.5 out of 9, very thin. She found evidence of lice infestation. The horse was in need of hoof trimming and was moderately stiff in all four limbs.

#5 Kit Kat, a Thoroughbred/Quarter Horse bay mare; came into PEC care and custody in October 2006 according to Samantha Milberdt Panayotopoulos, director of Columbia Basin Equine Rescue (CBER) who rescued the horse to Solomon. Dr Evergreen scored Kit Kat a 3 out of 9, thin. The horse suffered from lameness in all four limbs and had a draining abscess in her left hind heel bulb. Hair loss caused by Rain Rot or Scratches was found on her neck and hind end.

#6 Natasha, a Thoroughbred/Quarter Horse bay mare; Dr Evergreen scored this horse a 3.5 out of 9, thin. She found the hooves over due for trimming and causing significant stiffness in the legs. She also found a generalized mild case of dermatitis caused by scratches. She also found sutures remaining in the horse's vulva from a previous procedure that had become infected.

In addition, to the six horses found suffering from neglect and starvation, two additional horses belonging to Solomon (Captain and Lace) who were suffering considerably were humanely euthanized by Dr. Evergreen the week prior. King County Animal Control responding to complaints of neglect and working with Auburn Code Enforcement ordered the two horses to have medical examinations. Solomon stated to Animal Control that her vet was going to euthanize the horses, but was out of town. Dr. Evergreen was called and with Solomon's approval humanely euthanized the horses at PEC to relieve the horses from considerable and unnecessary suffering.

The two horses found on Solomon's property that were humanely euthanized were unnecessarily suffering and in considerable pain. The poor condition of the six horses were a result of the failure of Solomon to provide the animals with adequate food, sanitation and medical care. Dr. Evergreen's examination of the six horses rescued by Serenity Equine Rescue, found them to be in thin to very thin condition, lice infested and in need of medical treatment and nourishment. Dr. Evergreen concluded that all six of the horses were suffering from neglect and starvation which caused considerable pain and suffering.

Under penalty of perjury under the laws of the State of Washington, I certify that the foregoing is true and correct. Signed and dated by me this 11 day of April 2008 at Kent, Washington.


