



Predators of the Heart

“Dedicated to wildlife education, conservation, rescue”

4709 Welch Lane, Anacortes, WA 98221

Email: admin@predatorsoftheheart.com Phone: (360)770-7479

Mr. Cricchio and Skagit County Officials:

Thank you for receiving our application for a Special Use Permit with Skagit County. We have carefully and thoroughly reviewed the public comments and have provided responses as requested by Skagit County. As you’ll see below, Predators of the Heart (POTH) has always operated lawfully and, with one specific instance in 2021, has been a thoroughly safe and secure operation, providing sanctuary and protection for the animals it houses. POTH is a 501(c)(3) organization, vetted and routinely inspected by the United States Department of Agriculture (USDA). The USDA licenses POTH as a Class C Exhibitor, which is the highest level of licensing provided by the USDA for civilian organizations.

As a preface, it is critical that Skagit County understand what will happen if it denies this request for a Special Use Permit.

Should this permit be denied, most of the animals housed by POTH, either as rescues or for permanent placement, would likely have to be euthanized. This includes, but is not limited to, all its wolfdog population, cougars, birds of prey, reptiles, and small mammals. These animals are cared for by POTH and all POTH’s proceeds go to the care and safekeeping of these animals.

It is also critical to preface by noting that POTH has been in operation at this location since 2001—over 20 years at this location. It has operated largely in the face of hostility from a few select neighbors who seemed to copy and paste their comments on each of their letters. Despite those complaints, POTH has provided a continuous and vital resource to the community since its inception.

I. Exemptions

As noted above, Predators of the Heart operates lawfully and always has. Some of the comments—most notably by Kevin Welch and his attorney—say that POTH is “operating unlawfully” under RCW 16.30.030. Under RCW 16.30.030(1), “a person shall not own, possess, keep, harbor, bring into the state, or have custody or control of a potentially dangerous animal **except as provided in subsection (3) of this section.**” (emphasis added.)

RCW 16.30.030(3)

The law cited by Mr. Welch and his attorney provides its own exemption. Under RCW 16.30.030(3), “A person in legal possession of a potentially dangerous wild animal prior to July 22, 2007, and who is the legal possessor of the animal may keep possession of the animal for the remainder of the animal's life.”

Clearly, since POTH has been in operation since 1998, all “potentially dangerous animals” as defined by RCW 16.30 in its possession have been with POTH since before 2007 or are being housed on behalf of animal control or a government agency. All veterinary records, acquisition papers, and other documents that show POTH has possessed these animals prior to 2007 are available for Skagit County officials to review.

Yet, POTH’s exemptions do not end there.



Predators of the Heart

“Dedicated to wildlife education, conservation, rescue”

4709 Welch Lane, Anacortes, WA 98221

Email: admin@predatorsoftheheart.com Phone: (360)770-7479

RCW 16.030.020

Under RCW 16.30.020(c), “Duly incorporated nonprofit animal protection organizations, such as humane societies and shelters, housing an animal at the written request of the animal control authority or acting under the authority of this chapter” are exempt from RCW 16.30.

POTH is a duly incorporated nonprofit animal protection organization, and as evidenced by the attached contracts, works closely with animal control, Department of Fish and Wildlife (DFW), the U.S. military, and various counties across the state of Washington to provide housing and protection for rescued animals. For instance, earlier this summer, POTH worked with local military and animal control agencies to house and protect animals seized by each respective organization and does so on a regular basis. See attached **Exhibit A, example of government contract**.

POTH is exempt from RCW 16.30 under RCW 16.30.020(c) as it operates as a shelter and humane society, and houses animals at the written request of the animal control authority or acting under the authority of this chapter. Out of 100 animals currently residing at POTH, over 80 animals are rescues and have been given sanctuary because of POTH’s work. For instance, within the last year, the U.S. military, DFW, USDA, and U.S. Customs all contacted POTH regarding providing sanctuary for an animal. POTH provides this service for the benefit of the community. Many, if not most of these animals would have to be euthanized if not for POTH’s work.

In summary: POTH is indeed a “duly incorporated nonprofit animal protection organization” (see attached **Exhibit B, Nonprofit Status with the IRS and Washington Secretary of State**) and likewise houses, “**an animal** at the written request of... animal control authority or acting under the authority of this chapter.” Again: POTH works regularly with animal control agencies, law enforcement agencies, and federal authorities and has written agreements a sample of which has been attached hereto as **Exhibit A, Example of Government Contract**. POTH continues to assist many state and federal agencies, housing *many animals* at the written request of law enforcement and animal control agencies.

RCW 16.30.010(5)

In addition, POTH is a wildlife sanctuary under RCW 16.30.010(5).

RCW 16.30.010(5) defines a wildlife sanctuary as, “...a **nonprofit organization**...that cares for animals defined as **potentially dangerous** and:

- (1) No activity that is **not inherent** to the animal’s nature, natural conduct or the animal in its natural habitat is **conducted**;
- (2) No **commercial activity** involving animals occurs including, but not limited to, the sale of or trade in animals, animal parts, animal by-products or animal offspring, or the sale of photographic opportunities involving an animal, or the use of an animal for any type of entertainment purpose;
- (3) No **unescorted** public visitations or direct contact between the public and an animal; or
- (4) No **breeding** of animals occurs in the facility.

As noted above, POTH operates as a nonprofit organization and does not engage in any activity that is “not inherent” to the animal’s nature, that no “commercial activity” involving animals is taking place—specifically defining the sale or trade in animals or animal parts, by-products or offspring, or the sale of photographic opportunities involving an animal, “or the use of an animal for any type of entertainment purpose...”



Predators of the Heart

“Dedicated to wildlife education, conservation, rescue”

4709 Welch Lane, Anacortes, WA 98221

Email: admin@predatorsoftheheart.com Phone: (360)770-7479

Of important note: educational tours involving the animals are *not* for entertainment purposes; they are educational in nature. POTH staff and tour guides are highly trained regarding the nature of the animals, their diet(s), care and upkeep, housing, and much more. The tours that take place are never, ever “unescorted” and there is no “direct contact” between the public and a “potentially dangerous” animal. All POTH’s animals, except for the wolfdogs, are enclosed and unavailable to the public (more details below).

POTH cares for animals defined under Washington law as “potentially dangerous”—specifically, its cougar(s) that require constant care and maintenance due to their inability to care for themselves. POTH has animals listed on RCW 16.30.010(5): cougars, alligators, primates, and one snake that are members of the *family viperidae*. RCW 16.30.010 specifically excludes wolf-hybrids. RCW 16.30.010(2)(B) defines *family canidae*, wolves, as potentially dangerous, but specifically excludes **wolf-hybrids**. POTH’s wolfdog population are **wolf-hybrids** and, under RCW 16.30.010(2)(B), are specifically excluded from RCW 16.30.010.

The other animals referenced in the statute, namely cougars and snakes that are part of the *family elapidae*, are fully enclosed and never interact with the general public. The cougars have been owned prior to 2007 and any viewing occurs with two separate layers of fencing. POTH only allows certain members of its staff with specialized training to interact with the cougars because of their inability to care for themselves. For instance, one of the cougars suffers from severe diabetes—meaning it has a specialized diet and certain requirements for its care. There have never been any escapes from an enclosure, nor any interaction with the general public. These cougars are in the care of POTH because they need constant support. Without the care that POTH provides, the cougars would die.

The snakes housed by POTH are likewise enclosed: they live in full enclosures and are never exposed to the public for handling.

As such, as a nonprofit organization whose *specific purpose* is to house and care for “potentially dangerous animals” doing so at the behest of government organizations, POTH is considered a wildlife sanctuary and is exempt from RCW 16.30 under RCW 16.30.010(5).

RCW 16.30.020(l)—Class C Exhibitor/Fair Exemptions

Finally, POTH’s USDA Class C Exhibitor License also exempts it to RCW 16.30.010. Due to its work with state and local fair(s) statewide, POTH is exempt from RCW 16.30 under RCW 16.30.020(l). Further, as a Class C Exhibitor, the USDA’s highest level of licensing available to non-governmental entities, POTH is exempt from RCW 16.30 because of the extensive training required for said licensing. The plain language of the statute allows for POTH to **exhibit** the animals in its care and exempts the organization due to its participation in fairs statewide. It would be erroneous and nonsensical to “exempt” an organization from these regulations for the time(s) that it interacts with the general public most explicitly—at a public fair.

As a USDA Class C Exhibitor, POTH goes through regular (and random) inspections by federal officials. USDA inspections review all aspects of POTH’s operations: safety of the community and upkeep/caretaking of the animals, employee safety, animal care and diet, housing, ventilation, lighting, interior surfaces/cleanliness, enclosures/escapability, sanitation, pest control, feeding and watering, outdoor shelter(s), compatibility, record-keeping, veterinary care, handling, and transportation.

In short: POTH’s USDA Class C licensing subjects it to intense scrutiny, and its exhibiting at state fair(s) provide it with a broad exemption from RCW 16.30. Because of its licensing and work with governmental authorities, POTH likewise has been toured by many government agencies such as DFW, animal control



Predators of the Heart

“Dedicated to wildlife education, conservation, rescue”

4709 Welch Lane, Anacortes, WA 98221

Email: admin@predatorsoftheheart.com Phone: (360)770-7479

agencies, Skagit County officials, and each have inspected and reviewed its operations. As noted herein, POTH has attached its most recent USDA inspection, which took place in August 2022, where it received a perfect, no-compliance inspection. This is the highest rating available for a USDA inspection. See attached **Exhibit C, USDA August Inspection Results.**

Summary

POTH operates under several exemptions under Washington law. Each of which provide POTH with a full-fledged exemption to the laws regarding the housing and care of wild, exotic and/or potentially dangerous animals. POTH is a resource to law enforcement, animal control, DFW, and many other organizations; POTH works closely with local, state and federal authorities and has the highest-available licensing for civilian organizations (Class C Exhibitor License with the USDA) which requires extensive training, routine (and random) inspections and a litany of regulations for the care of its animals. POTH has been and will continue to be a resource to the community by safely housing and caring for each of the animals that are in its stead.

II. Non-Profit Purpose

There were a few comments inquiring about how POTH can operate educational tours (Airbnb tours, for one) while still maintaining its nonprofit status.

Every activity that POTH undertakes, from educational tours, to speaking events, to fairs, only **further its nonprofit purpose**. Simply because a nonprofit engages with a for-profit entity does not void its nonprofit status. The law requires that a nonprofit partake in activities that further its nonprofit purpose—every activity and event that POTH engages in, from educational tours to speaking events, is meant to raise awareness and funds for the protection, caregiving, and safekeeping of the animals it houses. Educating the public through tours is only one way in which that nonprofit purpose is furthered.

POTH’s nonprofit purpose is based on connecting us, as humans, to the glory and wonder of creation, including wildlife. God has connected all living things, and it is our job to maintain and care for these animals and the earth. As amended in 2015, under its Articles of Incorporation, “Predators of the Heart is a licensed 501(c)(3) nonprofit organization animal sanctuary that cares for potentially dangerous animals by providing a safe home for unwanted or abused...animals that have been confiscated by animal control agencies as well as potentially dangerous animals that for other reasons need to be safely housed and cared for...” This means that POTH’s purpose is to provide care and safekeeping to the animals that it houses—most of which could not survive without the constant care that POTH provides.

Further, and of note: the bylaws of POTH explicitly note that there shall be **no breeding** of animals. POTH does not breed exotic animals of any kind.

Historically, POTH was founded as a faith-based, religious organization that connects wildlife and the glory of creation to people. We are stewards of God’s creation and are meant to care for these animals; POTH exists to showcase that connection and to educate people on the web of life. Thousands of reviews online showcase that POTH is a place where people experience the beauty and glory of nature—which is why it has not eroded or otherwise developed the natural habitat where the animals reside.

The paid educational tours that POTH provides allows POTH to feed, house and otherwise protect these animals. Every dollar that is raised or paid to POTH goes to the care and well-being of the animals that it provides sanctuary for.



Predators of the Heart

“Dedicated to wildlife education, conservation, rescue”

4709 Welch Lane, Anacortes, WA 98221

Email: admin@predatorsoftheheart.com Phone: (360)770-7479

Virtual School Tours

Additionally, over the last number of years, POTH has partnered with Washington state school districts, providing virtual tours and educating thousands of children on how each animal plays a vital role in the web of life. With each of these tours, we are bringing a hope and a new love and appreciation for nature, including the animals we are trying to save and protect. Prior to these virtual tours, for many years POTH provided on-site animal experiences at many schools across the state of Washington.

POTH now also offers free virtual tours to all the schools districts in the United States and hopes to provide international educational tours in the years to come for qualified educational institutions. We hope to bring awareness to our youth the roles each and every animal plays allowing the ecosystem to survive and how we all contribute to the state of the world that we all share. This again is based on our religious foundation and the role that each of us plays in nature.

POTH has also had the opportunity to partner with the Make-a-Wish Foundation. We have had the opportunity to meet and serve an amazing young woman named Addie.

Addie was diagnosed with a brain tumor and was only given a few months to live. Her dreams and desire were to be an exotic veterinary technician. She was able to come out to our property and meet some amazing creatures. The impact she had on our organization are unexplainable. Her family have written a letter on our behalf, which is attached to this response as **Exhibit D, Addie’s Letter**. We provide these kinds of tours for free to the Make-a-Wish foundation. It is an honor and a privilege for POTH to provide a safe, secure place where these kinds of tours can take place.

Veteran Programs

POTH also works continuously for those who have served our country. We have partnered with our local military and provide them with an outreach program that caters to the men and women who have fought and served for our freedoms, providing tours to military families who have experienced trauma and have served our country so faithfully. POTH looks forward to continuing to work with local, regional and national organizations that assist veterans.

III. Safety

POTH has worked tirelessly with federal, state and local authorities at providing the safest and most secure facilities possible for the benefit of the community and the technology available. Having been at its current location for over twenty (20) years, POTH has had only two escapes—one of which was the result of repeated antagonization by neighboring, leash-less dogs.

One of the two escapes resulted in the death of a local dog. The neighboring dog, as mentioned, had repeatedly antagonized the wolfdogs of POTH. This was a tragic situation that could have happened to **any** neighbors with dogs.

That being said: POTH has taken every available measure to ensure that this **never** happens again.



Predators of the Heart

“Dedicated to wildlife education, conservation, rescue”

4709 Welch Lane, Anacortes, WA 98221

Email: admin@predatorsoftheheart.com Phone: (360)770-7479

First, POTH has reallocated its enclosures so that no wolves or wolf enclosures border any neighboring property. This means that the wolfdog runs and enclosures will never come in contact with neighbors, their pets or other animals—the enclosures and runs have all been moved so that they are never able to be “antagonized” or in any way approached by bordering properties. It removes all potential engagement with neighboring pets or people.

Second, POTH has implemented six-sided fencing for its wolfdog enclosures. These enclosures are impossible for wolfdogs, or canines of any kind, to escape. This means that there is fencing above, below, and around the wolfdogs. They literally cannot escape as explained more fully below.

Third, nearly every inch of POTH’s compound is under surveillance and/or populated with staff 24/7. POTH’s camera system tracks each animal, movement, incursions into the property and any movement from the property. The camera system, which again surveys virtually every foot of the property, is monitored 24/7, 365 days a week by POTH staff.

Finally, and most tragically, the wolfdog that was instigated and escaped has been euthanized by POTH. This wolfdog was with the staff for many years and was cared for by them. Still, unprompted, POTH euthanized the wolfdog as a result of the 2021 incident.

Six-Sided Fencing

As noted above, the wolfdogs are now *always* in six-sided fences at night, and are never in a position to escape the compound. These safety measures have been reviewed by various agencies, including the USDA, who have remarked that the safety measures taken by POTH are beyond adequate. Again: a six-sided enclosure means that the wolves *cannot escape*; they cannot dig out and they cannot jump over the fence. The fence is six-sided (above, below and four-walls) at all times when the wolves are not supervised.

Additionally, POTH has reallocated resources and moved its fencing so that none of the wolves, nor their runs, ever border any area where a human or pet could engage with them even through a six-sided fence.

Further, POTH has also put the enclosures of the wolves into *other* enclosures; meaning, even if a wolf were to somehow escape—they would only be able to escape into an additional enclosure. In a six-sided enclosure, escape is impossible. However, even considering that fact, POTH has implemented a fail-safe program whereby the wolves would only be able to escape into another enclosure.

Cameras

For safety and security purposes, POTH has not disclosed all of its camera angles and vantage points, but nearly every square foot of the compound is visible by POTH staff. The compound itself is monitored 24/7 by POTH, 365 days a year. Staff are on-site daily with the animals. When they are not with the animals, the animals are housed in six-sided enclosures as noted above.

USDA Inspections

As recently as August 5, 2022, POTH was inspected by the United States Department of Agriculture (USDA) and came away with its highest inspection status (no non-compliance). POTH continues to hold a Class C Exhibitor license, which is the highest licensing available to non-government agencies.

This also means that any escape requires a USDA inspection. Further—even when no escape occurs but an escape is *reported or alleged*, POTH is subsequently inspected by the USDA. This means that even when no escape happens, and, say, a coyote is mistaken for a wolf—the USDA still visits POTH and inspects its



Predators of the Heart

“Dedicated to wildlife education, conservation, rescue”

4709 Welch Lane, Anacortes, WA 98221

Email: admin@predatorsoftheheart.com Phone: (360)770-7479

facilities. This happens regularly. Additionally, POTH has invited other government agencies, such as Department of Fish and Wildlife and animal control agencies, including Skagit County officials, to inspect and review its operations. The comments from neighbors do not seem to have a clear understanding as to what POTH does, nor what animals it houses. Most of the animals at the POTH facility are rescued animals; the animals that are not, such as ambassador wolfdogs, are highly trained and are not considered dangerous or exotic by the USDA nor the Department of Fish and Wildlife. They are classified as canines. They are no more dangerous or vicious than any other dog, though, like all dogs, have different temperaments. POTH has attached its last 2 USDA inspection results to this Response. POTH has provided the results of its August inspection as noted herein.

Further, claims that POTH has had “repeated escapes” is inherently false.

“Repeated” Escapes

Some of the commenters have indicated “seeing” wolves on their property or properties. This is incorrect. It is important to note that most of the public comments likely have been promulgated and fueled by Kevin Welch, a businessman who has a history of disrepute in the community who has targeted the Predators of the Heart property for development. If POTH is denied a permit, Mr. Welch has long desired to acquire POTH’s property for his own benefit and leisure. Mr. Welch has made more than one offer on the POTH property over the years. Further, if POTH is denied a permit—most of the animals that have been provided sanctuary will have to be euthanized.

Mr. Welch has repeatedly sought to trespass onto POTH’s property, approaching our fence line and gated entrance in an effort to gain access so as to attempt to harm POTH and its organization. He, or his employees, have likely also repeatedly called POTH over the last number of months attempting to get POTH to violate its agreement with Skagit County. Mr. Welch even sought to book an educational tour with POTH, knowing that POTH was shut down while going through the Special Use Permit process. Mr. Welch also claims that POTH’s operations will bring excessive traffic to the area; we have also attached the camera footage of his property receiving over 36 vehicles in one day and 22 vehicles on another. POTH does not receive nearly that amount of traffic on any given day. Suffice to say: neighboring properties receive far more traffic than the few cars that travel to/from POTH’s compound for educational tours.

In any event, the actions of Mr. Welch show that he is not a concerned citizen. If Mr. Welch was so concerned with the safety of the animals—including the housing of the wolfdogs on the property or the other rescued animals being dangerous—he would not have repeatedly trespassed onto POTH property attempting to take pictures while attempting to incriminate POTH.

Further, Mr. Welch, or Mr. Welch’s attorney, cites nebulous, baseless claims. For instance, Mr. Welch’s attorney notes that, “one of our clients has seen wolves running loose on adjacent properties and in the Anacortes Community Forest on at least five separate occasions.” This type of vague, unfounded claim is only meant to stir up fear for Mr. Welch’s personal gain. Regarding that specific statement: first, there have been no escapes other than what has been publicly noted and discussed by POTH. Any escape, **and any alleged escape**, requires that the USDA be notified with a follow-up inspection. There have simply been no escapes.

Second: all of these properties are located in an admittedly *rural* area, bordering on hundreds of acres of forest and trails. Many animals—including large dogs and coyotes—run freely on these trails and in this area. It would



Predators of the Heart

“Dedicated to wildlife education, conservation, rescue”

4709 Welch Lane, Anacortes, WA 98221

Email: admin@predatorsoftheheart.com Phone: (360)770-7479

be impossible to identify a wolf unless it were up close—very close—to a human being. If a wolf were identifiable as belonging to POTH, it would have been noted and written about already. No wolves have escaped. Additionally, if a wolf were **running** as indicated by Mr. Welch’s attorney—how could it have been identifiable as a wolf to an untrained eye, from an unknown distance? How could an untrained individual identify that a wolf and not a coyote or a large dog was “running” on land that borders over 500 acres of forest land and trails? The reality is that those kinds of claims are patently false and intentionally unverifiable—they are fearmongering statements that have no way of being verified, and only serve to scare people. The reality is that there have not been “repeated” escapes. There have been two escapes in over 20 years, and one was at least partially due to the repeated instigation of a leash-less dog. As noted above, that issue has been remedied—the wolfdog enclosures no longer border any other property. Further, the wolfdog responsible has been euthanized and additional measures have been implemented to ensure that no wolf ever escapes again, regardless of the antagonization that occurs on the other side of the fence.

2012 Escape

First: wolfdogs are not classified by the USDA or Washington State as “Dangerous Animals” nor are they considered wildlife.

As noted above, POTH has already addressed the fact that neither the federal government nor Washington state recognize wolf-hybrids as “potentially dangerous animals” nor are they considered wildlife.

Second: Like any organization, POTH has drastically changed in its operations from 2012. Technology has changed and so have the operations for POTH. It has implemented many new security measures since 2012 and management has changed entirely. Some of those changes have been noted herein.

Third: as noted above, the wolfdogs are now **always** in six-sided fences at night and are never in a position to escape the compound. These safety measures have been reviewed by various agencies, including the USDA, who have remarked that the safety measures taken by POTH are beyond adequate. Again: a six-sided enclosure means that the wolfdogs **cannot escape**; they cannot dig out and they cannot jump over the fence. The fence is six-sided (above, below and four-walls) at all times when the wolves are not supervised.

Fourth, and finally: during the 2012 escape, no one was injured, and the wolfdog was more docile than most common house dogs. To recount: the wolfdog at that time was approached by a law enforcement officer, who was accompanied by a German Shepherd—the POTH wolfdog came when called and was leashed without incident. This instance would have been threatening to most dogs; a law enforcement agent, accompanied by a large breed dog, would have been threatening to most dogs—and yet, the POTH wolfdog was docile, came when called, and was leashed without incident.

The public comment made by Mr. Welch makes specific note of the backseat of the law enforcement vehicle being “destroyed”. This is a misstatement and shows a clear propensity to try and manipulate facts. **Any dog placed into the backseat of a car—especially a car with no windows—would become agitated and try to escape.**

Further, any dog that is housed exclusively outdoors and is not “house trained” would have a similar response to being put into an enclosed vehicle without supervision because it would cause the animal anxiety. In other words: if a Bernese Mountain dog who lived outside, or a German Shepherd or any large breed dog, were placed into the back of a vehicle without supervision, such an act would likely cause anxiety and the dog—any dog—might have a similar response. Even small dogs, such as a Jack Russell Terrier, would



Predators of the Heart

“Dedicated to wildlife education, conservation, rescue”

4709 Welch Lane, Anacortes, WA 98221

Email: admin@predatorsoftheheart.com Phone: (360)770-7479

or could “destroy” a car in the same manner as the wolfdog. The “destruction” of the backseat of a car is not an act of aggression; any animal expert—and most animal lovers—would testify to the same truth.

The fact that Mr. Welch failed to note (or his attorney failed to note) was the fact that the wolfdog was **completely docile** and **non-aggressive** with the law enforcement agent **and the law enforcement agent’s dog** show that they have no idea about the actual proclivities of the animals housed at POTH. Mr. Welch paints his own picture that the wolfdogs housed by POTH are vicious, wild animals—and yet cites to a story (from 2012) that shows, unequivocally, that the wolfdogs **come when called** and are **leashed without issue**. This is a great example as to POTH’s animal sanctuary and why it exists in the first place—to educate the public on the web of life and the wonder of creation.

Mr. Welch’s attorney also seems to make arguments that are incompatible with each other: on the one hand, he argues that the POTH property is located in a “rural community” that has very few people present, and yet simultaneously argues that POTH is surrounded by many families and homes.

In truth, Mr. Welch is not anywhere near the POTH property. His repeated trespasses onto the POTH property clearly show that he, for one, does not find the POTH property to be dangerous or a nuisance. It would appear that the primary instigator—the person responsible for most of the negative ire directed at POTH’s operations—is clearly someone who is not worried about his own safety or the safety of the Welch Lane community as he so boldly trespasses onto the POTH property.

These animals, like all animals, are not human. They are in need of service and protection; they have been rescued from dire situations. Each animal has been accounted for and is available for viewing, as many rescues allow, so that the public can be educated on their need and connectedness to nature. God has created these animals; it is our job to steward and protect them.

IV. Misstatements and Clarifications

A number of comments had misstatements or fallacious information in them, which we will seek to clarify below.

“Predators houses and breeds dozens of dangerous, wild animals”

- Predators does not breed animals, neither does it house wild animals.
- All of the animals housed are rescued or have been acquired from dire situations—such as the cougars, which were acquired by POTH prior to 2007. By way of example, these cougars are old, decrepit and sick. One of the cougars, Boy, suffers from severe diabetes. He would not and could not survive in the wild, which is why POTH cares for him daily.

“It is unclear what percentage of the Predators animals are indeed full wolves”

- None of the wolves are “full wolves”. Every wolfdog housed by POTH is a wolfdog—there are no “full wolves”.

“A wild animal “sanctuary” is incompatible with the neighboring properties because it poses a significant threat to the safety and health of the Welch Lane community.”



Predators of the Heart

“Dedicated to wildlife education, conservation, rescue”

4709 Welch Lane, Anacortes, WA 98221

Email: admin@predatorsoftheheart.com Phone: (360)770-7479

- POTH has been on this property without issue for over 20 years. It is notable that not every bordering neighbor sees POTH as a problem—only a few, and those few are led by Kevin Welch, who has sought to acquire POTH’s property for his own benefit. POTH has lived peaceably with other neighbors in the Welch Lane community that have not been instigated by Kevin Welch for over 20 years.
- A singular instance whereby an instigating dog was killed has been rectified by POTH, both financially and operationally. POTH is routinely checked by federal authorities for its safety compliance. It has reallocated its resources so that no wolfdog enclosure borders any neighboring property and has implemented a six-sided fencing system to ensure that wolfdogs cannot escape.
- POTH has been a continual resource to the community, including working closely with law enforcement, animal control, the U.S. military and other federal and state agencies to provide sanctuary for these animals.

“An October 2017 escape occurred”

- There was no escape at that time. Instead, an individual trespassed onto POTH property—the story cited merely notes that POTH implemented “warning signs” regarding its property.

“Humane shelters do not breed animals or offer paid tours to the public; their primary purpose is to rescue and rehome unhoused animals.”

- This was clearly written by an individual who only knows of dog and cat shelters. Most of the animals rescued and housed by POTH cannot be “rehomed”. They require specialized care and are brought to POTH precisely because no one can care for them.
- Additionally, as noted, POTH does not breed animals. This is stated clearly in its Articles of Incorporation, which is publicly available on the Secretary of State’s website
- Over 80% of its animals have been brought to POTH due to rescue—which is supported by the contracts POTH have provided in this response.

“The exception for persons displaying animals at a fair under RCW 16.30.020(1)(l) does not apply to [POTH]...”

- Mr. Welch’s attorney goes out of his way to state that the Legislature “did not intend to allow an organization or individual to house dozens of... animals on a year-round basis so long as they show animals at a state fair a few times per year” and yet—cites no authority about the Legislative intent for this exemption which clearly applies to POTH as it does, indeed, exhibit animals at fairs for several years.
- The plain language of the statute speaks for itself—the fair exemption is one of the exemptions for organizations to be exempt from the cited statute.
- Rather than cite actual authority or legislative intent, Mr. Welch’s attorney cites *City of Yakima v. Godoy*, a case that has nothing to do with RCW 16.30.020—but is about whether a car can be parked on



Predators of the Heart

“Dedicated to wildlife education, conservation, rescue”

4709 Welch Lane, Anacortes, WA 98221

Email: admin@predatorsoftheheart.com Phone: (360)770-7479

a highway during a police chase. This is a clear attempt to make it *seem* like case law that supports his position, when in reality the plain language of the statute at hand exempts POTH due to its work in the public spectrum at fairs.

- Mr. Welch’s attorney, lacking authority, uses subterfuge and unrelated case law to attempt to misdirect Skagit County into believing that POTH’s operations are somehow illegal—which they clearly are not.

“[POTH]...continues to violate various state laws”

- The citations set out by Mr. Welch and Mr. Welch’s attorney are all virtually focused on the same misdirection. POTH has several legal exemptions that allow it to operate, which it has noted above. It provides a public service to animal control and many state and federal entities. POTH is currently engaged in contractual relationships with multiple government entities.
- It is not a *per se* public nuisance because it is *exempt* from the statutes cited. *Per se*, meaning in violation of the law, is a false statement.

“POTH already creates and will continue to create undue noise and odor for the surrounding dwelling units.”

- Ironically, Mr. Welch (who made this comment) has far more traffic enter/exit onto his property than POTH on any given day. For example, on August 30, 2022 to August 31, 2022, Kevin Welch—the neighboring property for POTH—had no less than **20 vehicles** enter and exit his driveway, which includes his own employees and laborers. On September 6, 2022, Mr. Welch’s property had **36 cars** enter and exit his property. Mr. Welch also utilizes four-wheelers and ATV units on his property, and on any given day, uses massive street sweepers to clear his driveway as well as tractors and a “boom mower” to cut trees loudly and in mass. See attached **Exhibit E, Kevin Welch Property Traffic**. POTH is privy to this information because of its camera system, which monitors any potential exits or incursions to/from the POTH property. Suffice to say, Mr. Welch’s property and his property’s activities create far more traffic and noise than POTH’s compound.
- Mr. Welch’s attorney cites a complaint from 2015 which was dismissed—largely because the claims were not factually based, but were based on unsupported commentary by Mr. Welch himself.
- There are no odors from meat or other waste because POTH utilizes dumpsters. See attached **Exhibit F, Photos of POTH Dumpster**. All waste is properly disposed of.
- The property is in a rural location, bordering hundreds of acres of forest land, whereby actual wild animals do, indeed, make noise. The POTH compound is exceedingly quiet. The cougars referenced by Mr. Welch can barely walk—they do not screech. The wolfdogs housed by POTH howl three to four times per day—for less than 50 seconds. The noise does not stop regular conversations during educational tours—it is not excessive, repetitive nor exceedingly loud.
- There is no basis under which Mr. Welch claims that there is “excessive noise”; Skagit County employees were on-site and can attest to the volume of the animals.



Predators of the Heart

“Dedicated to wildlife education, conservation, rescue”

4709 Welch Lane, Anacortes, WA 98221

Email: admin@predatorsoftheheart.com Phone: (360)770-7479

“How can they work with AirBnB and be a nonprofit?”

- The term “nonprofit” is short for *not-for-profit*—it does not mean that an organization cannot charge for tours or activities that further its nonprofit purpose. For example, aquariums, zoos, wildlife sanctuaries—all charge for tours and yet they maintain their respective statuses as nonprofit organizations. With that, any nonprofit activity—such as an educational tour—must be “in furtherance of its nonprofit purpose”—of which every activity that POTH engages in does (including its educational tours).
- Moreover, all proceeds generated by POTH, its educational tours and other activities go exclusively to the care and safekeeping of the animals POTH houses. Not-for-profit means that the organization itself is not meant to benefit or profit an individual, partners or shareholders. POTH is a vetted 501(c)(3) organization with both the IRS and the Washington Department of Revenue. It exists to further its nonprofit purpose, which it has done for the last 20+ years.

“[POTH] and its frequent paid tours generate and will continue to generate intrusions on the privacy of surrounding uses.”

- As noted: POTH has far less traffic than one of the chief complainants, Mr. Kevin Welch. Mr. Welch has far more employees visiting his property on a daily basis and creates more noise with his property upkeep than any of POTH’s activities.
- POTH does not generate “commercial traffic”; they have less than twenty people per day on any given day in a rural area.

“Never until the past four or five years have I felt unsafe walking in the forest lands right adjacent to our property...our neighbors [POTH] have been in the news with documentation of dogs being killed by their hybrid wolves.”

- Oddly, Jenny Welch (wife of Kevin Welch) should know that POTH has been operating with its various rescued animals—including its wolfdog population—since 2001 yet has “felt unsafe” in the last four or five years. There’s no explanation as to why she suddenly felt “unsafe” in the last “four or five years” since POTH has been on the property and operating in the same manner since 2001.
- Ms. Welch cites to a “freelance writer Betsy Sikora Siino” in an unpublished “article”.
- This kind of fearmongering is not based in any kind an accurate depiction of wolfdogs and is not a credible source.

“POTH is seeking to expand”

- There is no planned expansion—nowhere in the Special Use Permit application has POTH stated that it plans to expand operations. If anything, POTH has sought to reduce its population in recent years.

“It’s a pay to play zoo where you can pay large sums of money to stay overnight”

- This is patently false. POTH is a wildlife sanctuary that provides educational tours in furtherance of its nonprofit purpose. There are **no overnight** accommodations, nor is POTH a “pay to play zoo”.



Predators of the Heart

"Dedicated to wildlife education, conservation, rescue"

4709 Welch Lane, Anacortes, WA 98221

Email: admin@predatorsoftheheart.com Phone: (360)770-7479

POTH exists to provide sanctuary and to educate the public on the importance of these wonderful, glorious creatures. We continue to work closely with federal, state, and local authorities to house animals that would otherwise be euthanized and/or can no longer care for themselves. It is a joy and a privilege to care for these animals. If our Special Use Permit is denied, many, if not most of these animals will have to be euthanized.

Thank you for your consideration and working with us through the permitting process. If you have any more questions, please feel free to contact me.

Ashley Carr
President / Executive Director
Predators of the Heart
360-770-7479

EXHIBIT A



Pierce County

Sheriff's Department

Parkland/Spanaway Precinct
495 Shandon Wright Way South
Tacoma, Washington 98444

Rescue Placement Agreement

This agreement is signed and executed after an application has been completed and a successful site assessment has been conducted by Pierce County Animal Control.

It is hereby agreed between:

Predators of the Heart USDA # 91-C-0071 REP: Ashley Carr/Director

and Pierce County Animal Control, that interested in the attached list of animals be transferred to the rescue organization, effective 6/2/2022, and that rescue organization will provide these animals:

- Rehabilitation, as directed by Pierce County Animal Control Officers.
- Adequate care.
- Placement into a permanent, high quality homes, whenever the animal is suitable for adoption

The rescue organization agrees to NEVER send any of the listed animals to public auction. If any of the listed animals become terminally ill or has a non-recoverable injury, the rescue agency agrees to humanely euthanize.

The Rescue organization acknowledges that these animals come from unknown origins and have been kept in substandard conditions. The animals may have special needs.

Pierce County reserves the right to inspect rescue organization premises and to view the listed animals. Pierce County will provide the rescue organization with adequate notice prior to such inspection. Animals may be repossessed by Pierce County and appropriate sanctions applied, if the rescue organization is found to be in violation of federal, state, or county laws pertaining to animal care.



Pierce County

Sheriff's Department

Parkland/Spanaway Precinct
495 Shandon Wright Way South
Tacoma, Washington 98444

We hereby agree to the terms of this agreement.

Signature [Rescue Organization's Director or Designee]

Ashley Carr

Printed Name

6/2/22

Date

Pierce County hereby releases its interest in the afore-mentioned animals and assigns this interest to the rescue organization named above

Signature [AC Supervisor or Designee]

Brian Boman #9201 AC Supervisor

Printed Name

6/2/2022

Date



Pierce County

Sheriff's Department

Parkland/Spanaway Precinct
495 Shandon Wright Way South
Tacoma, Washington 98444

Animals Transferred to Rescue Organization

ID #	Name (AKA)	Description	Special Care Instructions
	Unknown	Citron Cockatoo	
	Unknown	Sulphur Crested Cockatoo	
	Unknown	Sulphur Crested Cockatoo	
	Unknown	Sulphur Crested Cockatoo	
	Unknown	Plum Head Parakeet	
	Unknown	Plum Head Parakeet	
	Unknown	Plum Head Parakeet	
	Unknown	Derbyan Parakeet	
	Unknown	Double Yellow Head Amazon	
	Unknown	Blue Fronted Amazon	

M E M O R A N D U M

To: Dave Coleburn, Owner/Founder, Predators of the Heart

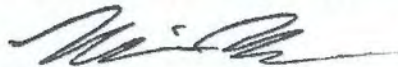
From: Brian Boman, Animal Control Supervisor, Pierce County Animal Control

Date: 8/3/2019

Subject: See attached Animal list

This memorandum will serve as full release effective this date to the Predators of the Heart for the above referenced Animal impounded on 12/23/2019 and currently in your care. Pierce County has no further requirement that the animals be held for legal or investigatory purposes. The Animal Owner is not permitted to redeem the animals listed above. Further action regarding the above animals are at the discretion of Predators of the Heart!

Please feel free to contact me directly with questions, comments, or concerns.



Brian Boman
Animal Control Supervisor
Pierce County Animal Control

Rescue Designee Dave Coleburn

Date: 8-31-2019



Pierce County Auditor's Office
Animal Services Division
2401 S 35th St, Room 200, Tacoma WA 98409-7414
Phone: 253-798-7006 | FAX: 253-798-7004

Animal list of birds released to Predators of the Heart

I am using the numbers assigned to the birds when Dr. Strunk assessed them.

- #3 Sulphur Crested Cockatoo with left wing held slightly forward (Dr. Strunk recommends radiograph of the wing)
- #23 Citron Crested Cockatoo (had a previous cloacal prolapse, will need to be monitored for possible continued vent irritation)
- #24 Sulphur Crested Cockatoo (prior feather damaging behavior, per Dr. Strunk, feathers may never grow completely back)
- #25 Sulphur Crested Cockatoo
- #36 Military Macaw
- #37 Military Macaw
- #38 Military Macaw
- #39 Military Macaw

ANIMAL SERVICES

CERTIFICATION OF TRANSFER

This is to certify that the following animals have been transferred to:

(Representative's
Name) Dave Coleburn
(Facility
Name) Predators of the Heart
(Facility
Address) 6128 Parkside Dr
ANACURTES WA 98227 phone 360-240-6164

ANIMALS TRANSFERRED:

Species/ Breed Savannah Monitor Lizard
Description _____

Species/Breed Male Coatimundis (MAX) 3yr
Description _____

Species/ Breed Female Coatimundis (Amillon) 3yrs
Description _____

Species/Breed Desert tortoise (Roosevelt)
Description _____

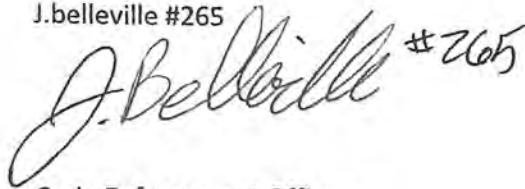
Species/Breed _____
Description _____

Animal Services makes no representation regarding the health or behavior of these animals, either currently or in future.

The entity accepting transfer agrees: 1) To accept possession and title of the animals, and waive any claim against Animal Services now or in future of the health of the animals or for damages caused by these animals. 2) that the animal(s) will not be placed or returned to the previous owner, Gloria Gilbert, or to any of her partners or business associates. 3) to allow Animal Services first right of refusal if conditions change and the transferee is unable to keep or offer adequate care to the listed animals.

I Officer J. Belleville with the Shelton Police Department release one adult porcupine that was contained in the Shelton Animal Shelter yard located at 902 W pine St. Shelton Washington. To Mike Mesa with Predators of the Heart.

J.belleville #265



Code Enforcement Office

Animal Control Officer

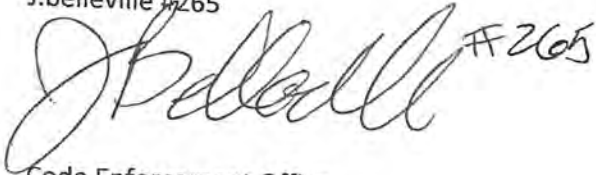
525 W Cota st.

Shelton Washington 98584

(360)426-4441

I Officer J. Belleville with the Shelton Police Department release four juvenile opossums that I rescued from their deceased mother on 07/24/2018 from the address of 1503 Ridge road located in Shelton Washington. To Mike Mesa with Predators of the Heart.

J.belleville #265



Code Enforcement Office

Animal Control Officer

525 W Cota st.

Shelton Washington 98584

(360)426-4441



ANIMAL SERVICES CERTIFICATION OF TRANSFER

3120 Martin Way E
Olympia, WA 98506
360-352-2510

This is to certify that the following animals have been transferred to:

Facility/Rescue Name PREDATORS Representative's Name _____

Facility Address _____

Phone () _____ (address/city/state/zip)

ANIMALS TRANSFERRED:

#1) Intake ID: 117820 Dog Cat Other ANTEATER
 Breed: _____ Animal's Name _____
 Male Female Altered Vaccines _____ date given _____
 Color/Description: _____ Chip #: _____ Lot #: _____

117821-
 #2) Intake ID: 117823 Dog Cat Other HAIKY ARMADILLO
 Breed: _____ Animal's Name _____
 Male Female Altered Vaccines _____ date given _____
 Color/Description: _____ Chip #: _____ Lot #: _____

117828/-
 #3) Intake ID: 117628 Dog Cat Other SPANISH RIBBED NEWT
 Breed: _____ Animal's Name _____
 Male Female Altered Vaccines _____ date given _____
 Color/Description: _____ Chip #: _____ Lot #: _____

Animal Services makes no representation regarding the health or behavior of these animals, either currently or in future.

The entity accepting transfer agrees: 1) to accept possession and title of the animals, and waive any claim against Animal Services now or in future of the health of the animals or for damages caused by these animals; 2) to allow Animal Services first right of refusal if conditions change and the transferee is unable to keep or offer adequate care to the listed animals; (3) to inform the adopter of the mandatory Washington State Rabies vaccine requirement for cats, dogs and ferrets as well as licensing requirements where applicable.

Signed: [Signature] 4-9-18
(for Rescuer) (date)

Signed: [Signature] _____
(for Animal Services) (date)



ANIMAL SERVICES CERTIFICATION OF TRANSFER

3120 Martin Way E
Olympia, WA 98506
360-352-2510

This is to certify that the following animals have been transferred to:

Facility/Rescue Name Predators of the North Representative's Name Mike

Facility Address _____
(address/city/state/zip)

Phone (____) _____

ANIMALS TRANSFERRED:

#1) Intake ID: 17866-67 Dog Cat Other DUCK

Breed: _____ Animal's Name _____

Male Female Altered Vaccines _____ date given _____

Color/Description: White Chip #: _____ Lot #: _____

#2) Intake ID: _____ Dog Cat Other _____

Breed: _____ Animal's Name _____

Male Female Altered Vaccines _____ date given _____

Color/Description: _____ Chip #: _____ Lot #: _____

#3) Intake ID: _____ Dog Cat Other _____

Breed: _____ Animal's Name _____

Male Female Altered Vaccines _____ date given _____

Color/Description: _____ Chip #: _____ Lot #: _____

Animal Services makes no representation regarding the health or behavior of these animals, either currently or in future.

The entity accepting transfer agrees: 1) to accept possession and title of the animals, and waive any claim against Animal Services now or in future of the health of the animals or for damages caused by these animals; 2) to allow Animal Services first right of refusal if conditions change and the transferee is unable to keep or offer adequate care to the listed animals; (3) to inform the adopter of the mandatory Washington State Rabies vaccine requirement for cats, dogs and ferrets as well as licensing requirements where applicable.

Signed: [Signature] _____ 4-9-18
(for Rescue) (date)

Signed: [Signature] _____ 4/9/18
(for Animal Services) (date)



ANIMAL SERVICES CERTIFICATION OF TRANSFER

3120 Martin Way E
Olympia, WA 98506
360-352-2510

This is to certify that the following animals have been transferred to:

Facility/Rescue Name Predators of the Heart Representative's Name Mike

Facility Address _____

Phone (____) _____ (address/city/state/zip)

ANIMALS TRANSFERRED:

#1) Intake ID: 17759-104-117763 Dog Cat Other skoth
 Breed: _____ Animal's Name _____
 Male Female Altered Vaccines _____ date given _____
 Color/Description: _____ Chip #: _____ Lot #: _____

#2) Intake ID: 17764 Dog Cat Other BEARDED LIZARD
 Breed: _____ Animal's Name _____
 Male Female Altered Vaccines _____ date given _____
 Color/Description: _____ Chip #: _____ Lot #: _____

#3) Intake ID: 17766 Dog Cat Other elongated TORTOISE
 Breed: _____ Animal's Name _____
 Male Female Altered Vaccines _____ date given _____
 Color/Description: _____ Chip #: _____ Lot #: _____

Animal Services makes no representation regarding the health or behavior of these animals, either currently or in future.

The entity accepting transfer agrees: 1) to accept possession and title of the animals, and waive any claim against Animal Services now or in future of the health of the animals or for damages caused by these animals; 2) to allow Animal Services first right of refusal if conditions change and the transferee is unable to keep or offer adequate care to the listed animals; (3) to inform the adopter of the mandatory Washington State Rabies vaccine requirement for cats, dogs and ferrets as well as licensing requirements where applicable.

Signed: [Signature] _____ (for Rescue) 4/9/10 _____ (date)

Signed: [Signature] _____ (for Animal Services) 4/9/10 _____ (date)

**CONTRACT TO CONDITIONALLY TRANSFER
AN ANIMAL
HELD FOR COURT EVIDENCE**

It is understood and agreed between City of Lacey, as the designated administrative agent of the Joint Animal Services Commission, and PREDATORS OF THE HEART

The Rescue, that, subject to the terms and conditions of this contract, the Rescue shall have full authority and responsibility for ownership and control of (description of animal) 3 CHAMAN LIZARDS, VELED CHAMELEON, RED TOED TORTOISE
Beginning at such time as the animal is placed in said Rescue's home until final determination by the Court.

The services to be performed by the Rescue pursuant to this agreement will be performed or rendered entirely at Rescue's own risk and the Rescue expressly agrees to hold harmless and indemnify City of Lacey and its contracting participants, officers, agents, and employees from any and all liability, loss or damage, including reasonable cost of defense that they may suffer as a result of claims, demands, actions or damages to any and all persons or property which result from the acts of the Rescue or the acts of the animal placed in the home of the Rescue pursuant to this contract.

The Rescue shall further maintain current public liability and property damage insurance in amounts and with companies acceptable to the City of Lacey. The limits of such coverage shall not be less than \$100,000.00 single limit bodily injury and property damage per occurrence. A certificate of such insurance or a copy of such insurance policy shall be provided prior to the animal being placed in the Rescue's home. Coverage in the minimum amount set forth herein shall not be construed to relieve the Rescue from liability in excess of such coverage.

The Rescue further agrees to conform with all local ordinances affecting animals; to notify Animal Services if the animal is in need of any medical procedure, or before grooming if any removal of fur is deemed necessary; to surrender the animal to Animal Services if the court's decision directs that the animal be placed elsewhere; and to notify Animal Services immediately if the Rescue is not able to keep the animal.

[Signature]
Rescue's signature N/A

[Signature]
Animal Services Staff Signature

Rescue's address

253-468-7123

Rescue's phone number
(fhcontract)

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control numbers for this information collection are 0579-0036 and 0579-0093. The time required to complete this information collection is estimated to average .1 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

OMB APPROVED
0579-0036
0579-0093

UNITED STATES DEPARTMENT OF AGRICULTURE
ANIMAL AND PLANT HEALTH INSPECTION SERVICE

RECORD OF ACQUISITION, DISPOSITION OR TRANSPORT OF ANIMALS
(Other Than Dogs and Cats)

SALE EXCHANGE OR TRANSFER DONATION

This record is required by law (7 U.S.C. 2131-2156). (9 CFR, Subchapter A, Parts 1, 2, and 3). Failure to maintain this record can result in a suspension or revocation of license and/or imprisonment for not more than 1 year, or a fine of not more than \$1,000, or both.

INSTRUCTIONS: Complete applicable items 1 through 13. Original and one copy to accompany animals. When delivery is made - Items 14 through 20 must be completed by Buyer (Receiver) and copy one returned to Dealer (Seller or Donor). Copy two to be retained by Dealer (Seller or Donor). Attach Continuation Sheet (APHIS Form 7020A), as needed.

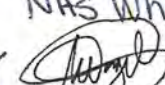
1. INVOICE NUMBER _____ 2. PAGE _____

3. DATE OF DISPOSITION
5/8/21

4. DEALER'S LICENSE NUMBER
NAS Whidbey

5. SELLER OR DONOR (Name and Address, include ZIP Code)

6. BUYER OR RECEIVER (Name and Address, include ZIP Code)

NAS Whidbey
X  ABH² EVANGELISTA

Predators of the Heart
4709 Welch Lane
Arlington WA 98221

Skunk came in on plane

7. USDA LICENSE NUMBER (if any)
91-C-0071

8. IDENTIFICATION OF ANIMALS BEING DELIVERED

A. CONTAINER TAG NUMBER, CRATE OR PEN NUMBER	B. NUMBER ANIMALS	C. PREVIOUS INVOICE NUMBER (if any)	D. INDIVIDUAL IDENTIFICATION TATTOOS, TAG NUMBERS (if applicable)	E. SPECIES	AGE - SEX				H. EST. WEIGHT (lbs.)	I. REMARKS (Condition, etc.)	RECEIVER'S USE	
					F. NUMBER YOUNG	G. NUMBER ADULT	M	F			J.	K.
①	①		Black white	Skunk	M	F	M	F	2lbs	TBO	quart quart	
					M	F	M	F				
					M	F	M	F				
					M	F	M	F				
					M	F	M	F				
					M	F	M	F				
					M	F	M	F				
					M	F	M	F				
					M	F	M	F				
					M	F	M	F				
					M	F	M	F				
					M	F	M	F				

DELIVERY BY COMMERCIAL CARRIER

9. DELIVERY BY ("X" one) Buyer's Truck Dealer's Truck (Seller or Donor)

10. TRUCK LICENSE NUMBER _____ 11. BILL OF LADING NUMBER _____

12. NAME AND ADDRESS OF COMPANY OR FIRM (Include ZIP Code)
NAS Whidbey

13. NAME AND ADDRESS OF TRUCK DRIVER (Include ZIP Code)
POTH

DELIVERY RECEIPT - TO BE COMPLETED BY BUYER OR RECEIVER

14. ANIMALS DELIVERY WERE ("X" one)
 IN APPARENT GOOD CONDITION POOR CONDITION REJECTED (Attach explanation for rejection)

15. TOTAL NUMBER RECEIVED _____ 16. NUMBER DEAD _____ 17. NUMBER ALIVE ①


18. BY (Signature)  19. TITLE President 20. DATE 5/8/21

EXHIBIT B

INTERNAL REVENUE SERVICE
P. O. BOX 2508
CINCINNATI, OH 45201

DEPARTMENT OF THE TREASURY

Date: MAY 08 2002

PREDATORS OF THE HEART
6128 PARKSIDE DR
ANACORTES, WA 98221

Employer Identification Number:
91-1951095
DLN:
17053233041041
Contact Person:
HENRY F SHAMBURGER ID# 31472
Contact Telephone Number:
(877) 829-5500
Accounting Period Ending:
December 31
Form 990 Required:
Yes
Addendum Applies:
No

Dear Applicant:

Based on information supplied, and assuming your operations will be as stated in your application for recognition of exemption, we have determined you are exempt from federal income tax under section 501(a) of the Internal Revenue Code as an organization described in section 501(c) (3).

We have further determined that you are not a private foundation within the meaning of section 509(a) of the Code, because you are an organization described in sections 509(a) (1) and 170(b) (1) (A) (vi).

If your sources of support, or your purposes, character, or method of operation change, please let us know so we can consider the effect of the change on your exempt status and foundation status. In the case of an amendment to your organizational document or bylaws, please send us a copy of the amended document or bylaws. Also, you should inform us of all changes in your name or address.

As of January 1, 1984, you are liable for taxes under the Federal Insurance Contributions Act (social security taxes) on remuneration of \$100 or more you pay to each of your employees during a calendar year. You are not liable for the tax imposed under the Federal Unemployment Tax Act (FUTA).

Since you are not a private foundation, you are not subject to the excise taxes under Chapter 42 of the Code. However, if you are involved in an excess benefit transaction, that transaction might be subject to the excise taxes of section 4958. Additionally, you are not automatically exempt from other federal excise taxes. If you have any questions about excise, employment, or other federal taxes, please contact your key district office.

Grantors and contributors may rely on this determination unless the Internal Revenue Service publishes notice to the contrary. However, if you lose your section 509(a) (1) status, a grantor or contributor may not rely on this determination if he or she was in part responsible for, or was aware of, the act or failure to act, or the substantial or material change on the

Letter 947 (DO/CG)

PREDATORS OF THE HEART

part of the organization that resulted in your loss of such status, or if he or she acquired knowledge that the Internal Revenue Service had given notice that you would no longer be classified as a section 509(a)(1) organization.

Donors may deduct contributions to you as provided in section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to you or for your use are deductible for federal estate and gift tax purposes if they meet the applicable provisions of Code sections 2055, 2106, and 2522.

Contribution deductions are allowable to donors only to the extent that their contributions are gifts, with no consideration received. Ticket purchases and similar payments in conjunction with fundraising events may not necessarily qualify as deductible contributions, depending on the circumstances. See Revenue Ruling 67-246, published in Cumulative Bulletin 1967-2, on page 104, which sets forth guidelines regarding the deductibility, as charitable contributions, of payments made by taxpayers for admission to or other participation in fundraising activities for charity.

In the heading of this letter we have indicated whether you must file Form 990, Return of Organization Exempt From Income Tax. If Yes is indicated, you are required to file Form 990 only if your gross receipts each year are normally more than \$25,000. However, if you receive a Form 990 package in the mail, please file the return even if you do not exceed the gross receipts test. If you are not required to file, simply attach the label provided, check the box in the heading to indicate that your annual gross receipts are normally \$25,000 or less, and sign the return.

If a return is required, it must be filed by the 15th day of the fifth month after the end of your annual accounting period. A penalty of \$20 a day is charged when a return is filed late, unless there is reasonable cause for the delay. However, the maximum penalty charged cannot exceed \$10,000 or 5 percent of your gross receipts for the year, whichever is less. For organizations with gross receipts exceeding \$1,000,000 in any year, the penalty is \$100 per day per return, unless there is reasonable cause for the delay. The maximum penalty for an organization with gross receipts exceeding \$1,000,000 shall not exceed \$50,000. This penalty may also be charged if a return is not complete, so be sure your return is complete before you file it.

You are required to make your annual information return, Form 990 or Form 990-EZ, available for public inspection for three years after the later of the due date of the return or the date the return is filed. You are also required to make available for public inspection your exemption application, any supporting documents, and your exemption letter. Copies of these documents are also required to be provided to any individual upon written or in person request without charge other than reasonable fees for copying and postage. You may fulfill this requirement by placing these documents on the Internet. Penalties may be imposed for failure to comply with these requirements. Additional information is available in Publication 557, Tax-Exempt Status for Your Organization, or you may call our toll free number shown above.

PREDATORS OF THE HEART

You are not required to file federal income tax returns unless you are subject to the tax on unrelated business income under section 511 of the Code. If you are subject to this tax, you must file an income tax return on Form 990-T, Exempt Organization Business Income Tax Return. In this letter we are not determining whether any of your present or proposed activities are unrelated trade or business as defined in section 513 of the Code.

You need an employer identification number even if you have no employees. If an employer identification number was not entered on your application, a number will be assigned to you and you will be advised of it. Please use that number on all returns you file and in all correspondence with the Internal Revenue Service.

If we have indicated in the heading of this letter that an addendum applies, the enclosed addendum is an integral part of this letter.

Because this letter could help resolve any questions about your exempt status and foundation status, you should keep it in your permanent records.

If you have any questions, please contact the person whose name and telephone number are shown in the heading of this letter.

Sincerely yours,



Steven T. Miller
Director, Exempt Organizations

EXHIBIT C



Inspection Report

PREDATORS OF THE HEART
6128 PARKSIDE DRIVE
ANACORTES, WA 98221

Customer ID: **8612**

Certificate: **91-C-0071**

Site: 001

PREDATORS OF THE HEART

Type: RE-LICENSE INSPECTION

Date: 29-JUL-2022

No non-compliant items were identified during this Re-License inspection.

This is a 2nd Re-License Inspection for a Class "C" license. The inspection and exit briefing were conducted with the applicant. The applicant is ready to be licensed under the AWA.

A copy of your license will be sent to you without any additional action on your part. If you have not received your license within 30 days, please contact the USDA at 970-494-7478.

Prepared By: DIANE FORBES

USDA, APHIS, Animal Care

Date:
03-AUG-2022

Title: VETERINARY MEDICAL
OFFICER

Received by Title: Applicant

Date:
03-AUG-2022



Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
8612	91-C-0071	001	PREDATORS OF THE HEART	29-JUL-2022

Count	Scientific Name	Common Name
000002	<i>Callithrix pygmaea</i>	PYGMY MARMOSET
000003	<i>Puma concolor</i>	PUMA / MOUNTAIN LION / COUGAR
000001	<i>Erethizon dorsatum</i>	NORTH AMERICAN PORCUPINE
000001	<i>Myrmecophaga tridactyla</i>	GIANT ANTEATER
000001	<i>Chaetophractus nationi</i>	BOLIVIAN HAIRY ARMADILLO
000002	<i>Choloepus hoffmanni</i>	HOFFMANN'S TWO-TOED SLOTH
000002	<i>Potos flavus</i>	KINKAJOU
000001	<i>Mephitis mephitis</i>	STRIPED SKUNK
000001	<i>Nasua nasua</i>	SOUTH AMERICAN COATI
000015	<i>Canis lupus X C. l. familiaris</i>	WOLF/DOG HYBRID
000004	<i>Procyon lotor</i>	RACCOON
000001	<i>Mephitis macroura</i>	HOODED SKUNK
000001	<i>Lynx rufus</i>	BOBCAT
000002	<i>Capra hircus</i>	DOMESTIC GOAT
000001	<i>Oryctolagus cuniculus</i>	DOMESTIC RABBIT / EUROPEAN RABBIT
000038	Total	



Inspection Report

PREDATORS OF THE HEART
6128 PARKSIDE DRIVE
ANACORTES, WA 98221

Customer ID: **8612**

Certificate: **91-C-0071**

Site: 001

PREDATORS OF THE HEART

Type: ROUTINE INSPECTION

Date: 25-AUG-2022

No non-compliant items identified during this inspection.

This inspection and exit interview were conducted with the facility representative.

Prepared By: DIANE FORBES

USDA, APHIS, Animal Care

Title: VETERINARY MEDICAL
OFFICER

Date:
29-AUG-2022

Received by Title: Facility Representative

Date:
29-AUG-2022



Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
8612	91-C-0071	001	PREDATORS OF THE HEART	25-AUG-2022

Count	Scientific Name	Common Name
000001	<i>Oryctolagus cuniculus</i>	DOMESTIC RABBIT / EUROPEAN RABBIT
000002	<i>Capra hircus</i>	DOMESTIC GOAT
000002	<i>Callithrix pygmaea</i>	PYGMY MARMOSET
000003	<i>Puma concolor</i>	PUMA / MOUNTAIN LION / COUGAR
000001	<i>Erethizon dorsatum</i>	NORTH AMERICAN PORCUPINE
000001	<i>Myrmecophaga tridactyla</i>	GIANT ANTEATER
000001	<i>Chaetophractus nationi</i>	BOLIVIAN HAIRY ARMADILLO
000002	<i>Choloepus hoffmanni</i>	HOFFMANN'S TWO-TOED SLOTH
000002	<i>Potos flavus</i>	KINKAJOU
000001	<i>Mephitis mephitis</i>	STRIPED SKUNK
000001	<i>Nasua nasua</i>	SOUTH AMERICAN COATI
000015	<i>Canis lupus X C. l. familiaris</i>	WOLF/DOG HYBRID
000004	<i>Procyon lotor</i>	RACCOON
000001	<i>Mephitis macroura</i>	HOODED SKUNK
000001	<i>Lynx rufus</i>	BOBCAT
000038	Total	

EXHIBIT D

To whom it may concern,

My family and I had the absolute privilege of being treated to a day at Predators of The Heart by Ashley and Holly. My oldest daughter, who has since passed away, had terminal brain cancer and not long to live. These women put together an unforgettable day for Addie and memories for our family that we will never forget. They gave her gifts and took so many pictures so that we could just enjoy the day. They made sure that everyone had the best experience.

I cannot begin to tell you what this place means to my family and I. It will always be a place we can go visit and remember Addie's smile as she saw all the animals and was able to learn about them and love on them. Addie loved animals and dreamed of being a vet so POH was truly a life fulfilling experience for her. Ashley has offered to plant a tree in honor of Addie with a plaque describing our daughter. We are currently in the works with the design. This would make this place even more special to us.

During our day visit there, Ashley and Holly both spent special attention on Addie making sure she could ask any questions and hold the animals. The highlight of Addie's day was howling with the wolves. If she could've been a wolf, she would've. That girl's eyes sparkled like never before while she was howling with the wolves.

Ashley and Holly have both gone above and beyond just that day. They have continued to be support for us and show us what a strong community means. I cannot stress enough how much they mean to us, how much they did for us and how much I know they will continue to do for families like ours. Please know that they have made a huge, positive impact on our entire family.

Thank you for your time,

Courtney Bourasaw
360-548-9700

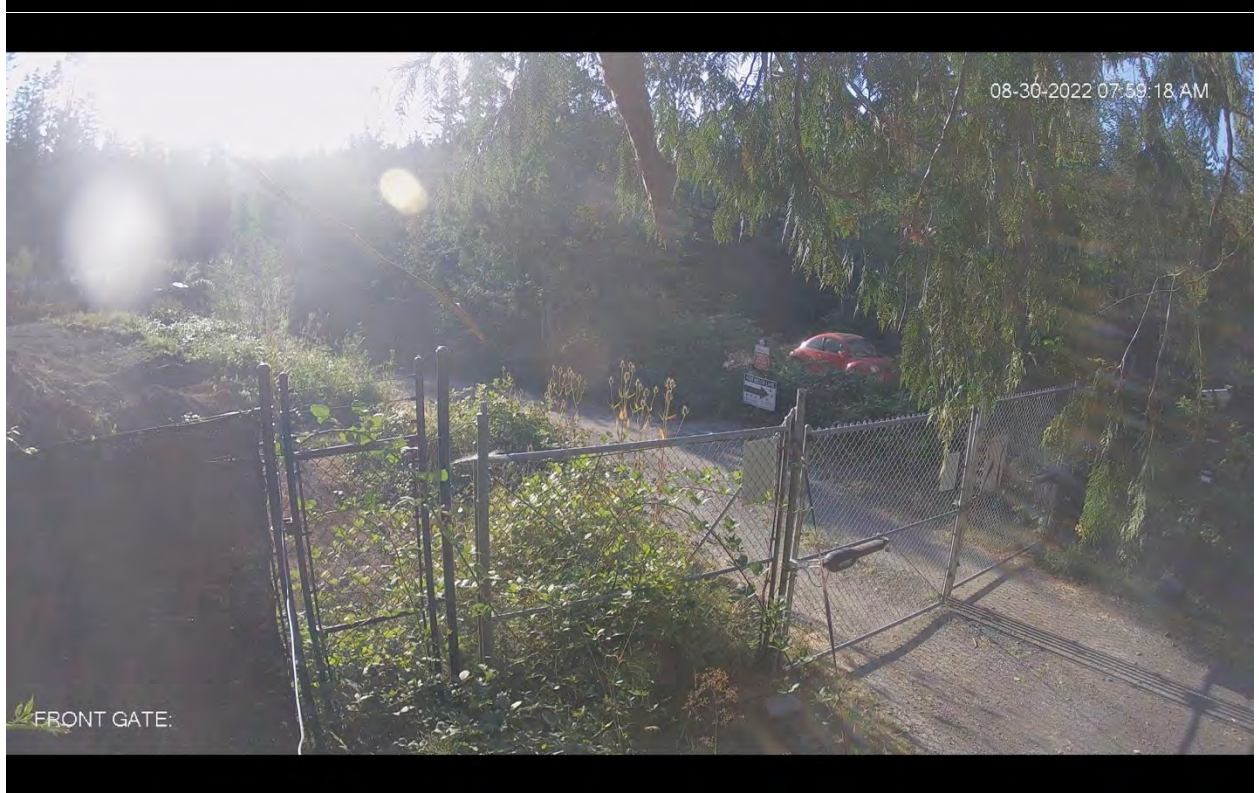
To whom it may concern,

A year ago I got to meet the wolves at Predators of the Heart. This was a special circumstance as my daughter Addie had terminal brain cancer. That was a dream come true for Addie. Ashley invited us to come spend the day and made Addie feel like she was part of the family. Not only did she make her feel like it but we became part of it. Ashley helped Addie fulfill one of her biggest dreams and that was to meet a real wolf. Addie is no longer with us and after her passing we decided to plant a tree in her honor. We thought of the one place Addie would want that to grow and that is Predators of the Heart. That place holds a memory of Addie that will never be forgotten. The joy and excitement on Addie's face when she became a wolf and howled with the pack will always be close to my heart. The love and care we got from the pack at Predators of the Heart will always be cherished. A piece of my little girl will always be part of the pack.

Yours sincerely,
Ben Bourasaw

“Wherever we go in the mountains, we find more than we seek.” John Muir

EXHIBIT E







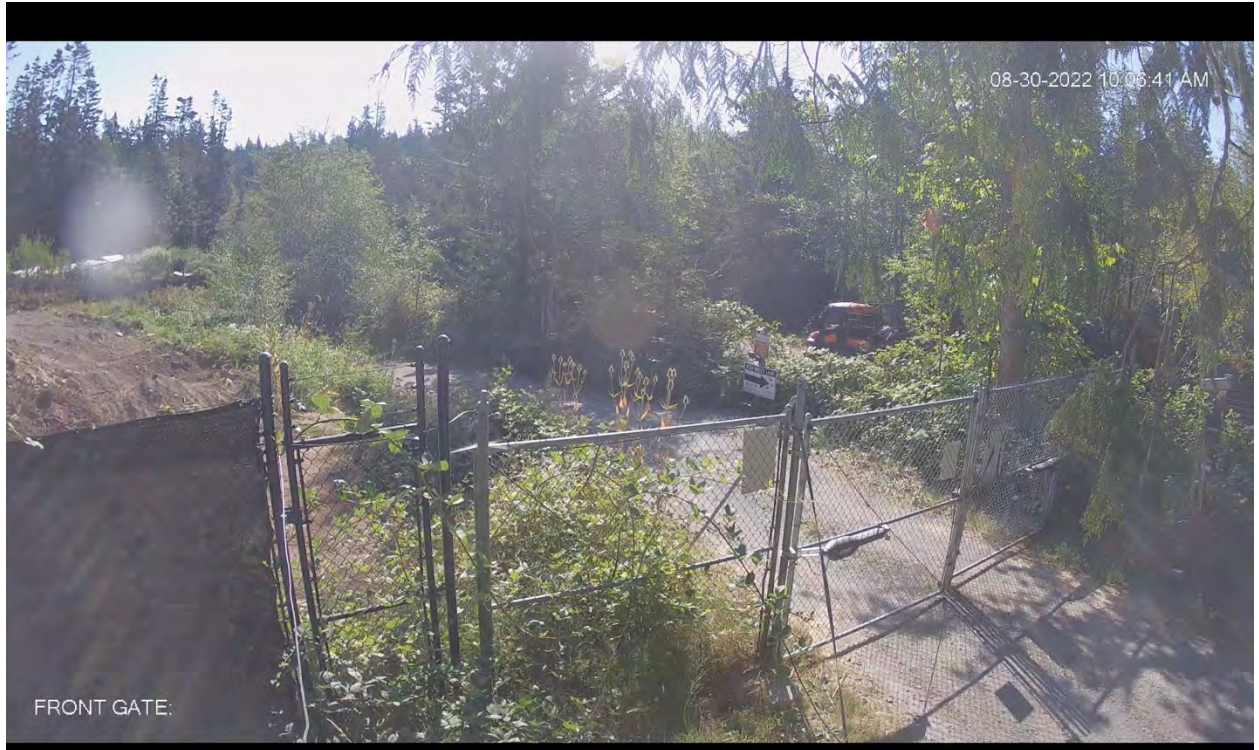
FRONT GATE:



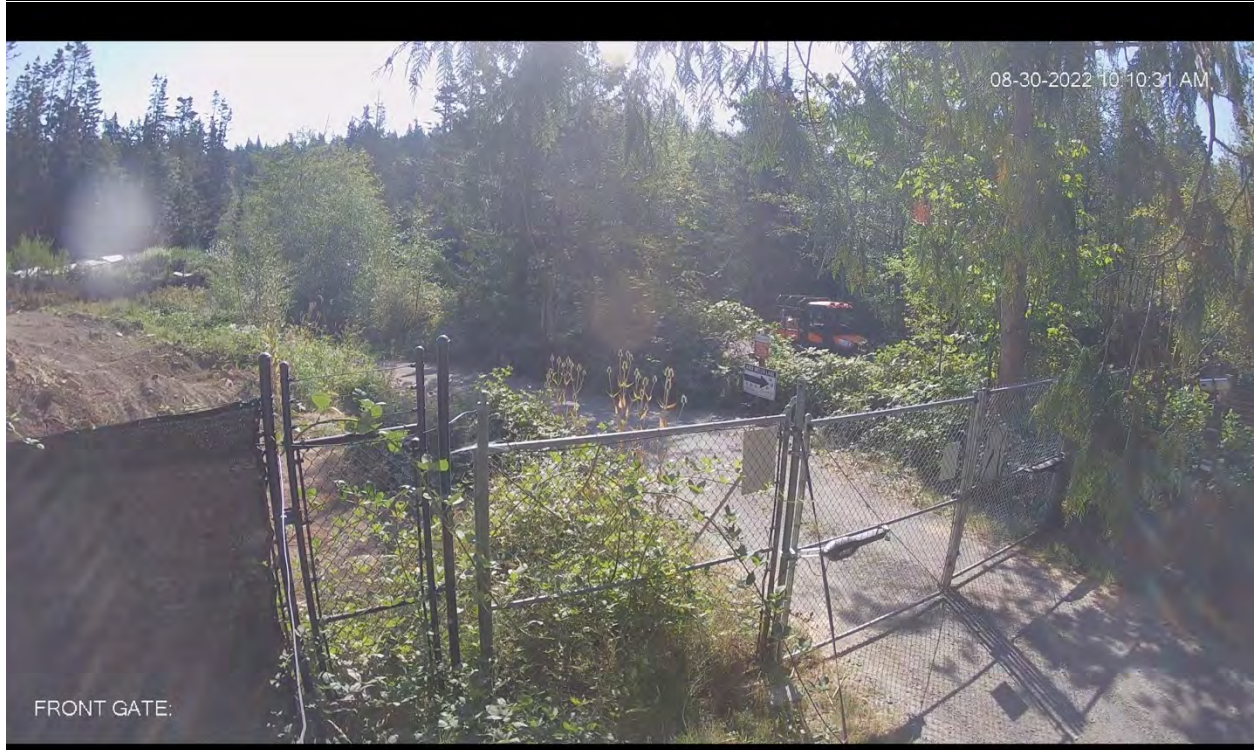
FRONT GATE:







FRONT GATE:



FRONT GATE:







































09-06-2022 08:25:17 PM

KEYPAD



09-06-2022 08:25:53 PM

KEYPAD

09-06-2022 08:28:12 PM



KEYPAD

09-06-2022 08:28:32 PM



KEYPAD

09-06-2022 08:29:11 PM



KEYPAD

09-06-2022 08:29:15 PM



KEYPAD

09-06-2022 08:32:05 PM



KEYPAD

09-06-2022 08:32:32 PM



KEYPAD

09-06-2022 08:33:13 PM



KEYPAD

09-06-2022 08:34:01 PM



KEYPAD

09-06-2022 08:39:41 PM



KEYPAD

09-06-2022 08:40:11 PM



KEYPAD

09-06-2022 08:43:08 PM



KEYPAD

09-06-2022 08:43:14 PM



KEYPAD

09-06-2022 08:43:19 PM



KEYPAD

09-06-2022 08:52:32 PM



KEYPAD

EXHIBIT F

