

VIRGINIA :

IN THE CIRCUIT COURT FOR FAIRFAX COUNTY

PEOPLE FOR THE ETHICAL TREATMENT :  
OF ANIMALS, INC., :  
501 Front Street :  
Norfolk, Virginia 23510, :

Plaintiff :

v. :

HEIDI MEINZER, :  
818 West Timber Branch Parkway :  
Alexandria, Virginia 22302, :

WILLIAM GOMAA, :  
23 U Street, N.W. :  
Washington, D.C. 20001, :

EDWARD ARMSTRONG, :  
15223 Lankford Highway :  
Bloxom, Virginia 23308, :

-and- :

JULLIANA ARMSTRONG, :  
15223 Lankford Highway :  
Bloxom, Virginia 23308, :

Defendants :

2018-01234

CIVIL NO. \_\_\_\_\_

FILED  
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FAIRFAX COUNTY, VA

COMPLAINT

COMES NOW plaintiff PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS, INC. ("PeTA") and moves this Court for entry of judgment against HEIDI MEINZER, WILLIAM GOMAA, EDWARD ARMSTRONG, AND JULLIANA ARMSTRONG, jointly and severally, and in support alleges and avers as follows.

### NATURE OF ACTION

1. In this lawsuit, PeTA seeks redress for the injuries and damages it has sustained due to the actions of the named Defendants and their conspiracy to interfere with and harm PeTA in its business of seeking to improve treatment of all animals. These actions have been undertaken for their own personal and pecuniary benefit and the benefit of their respective organizations. In doing so, the Defendants colluded with the other conspirators named herein, as well as others. To achieve their fraudulent goals, the Defendants and their co-conspirators, *inter alia*, have intentionally made false complaints to law enforcement authorities, improperly sought that criminal charges be brought against two individuals assisting PeTA, knowingly or with reckless disregard for the truth made numerous maliciously false statements to members of the Virginia legislature and to the public in general, and engineered the filing of a bogus lawsuit against PeTA – all with the purpose and intent of injuring PeTA's position as a preeminent defender of animals and animal rights and putting PeTA out of business.

### JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction over PeTA's claims in this matter pursuant to Va. Code Ann. § 17.1-513 (2012) in that the recovery sought is greater than \$25,000 and no other court may assert jurisdiction.

3. This Court has personal jurisdiction over all Defendants in that all Defendants are either residents of the Commonwealth, or have engaged in tortious activities as described herein within the Commonwealth.

4. Venue is appropriate in this Court pursuant to § 8.01-262(3) in that defendant Meinzer regularly conducts affairs or business activity within the County of Fairfax.

## PARTIES

5. PeTA, founded in 1980 and with its headquarters in Norfolk, is the world's largest animal-rights organization. PeTA is a tax-exempt charitable organization under Section 501(c)(3) of the Internal Revenue Code. For nearly four decades, PeTA has been a strong and consistent voice to prevent animal suffering and promote animal rights worldwide. PeTA operates a private open admission shelter in Norfolk and is inspected by the Commonwealth of Virginia. As an open-admission shelter, PeTA's shelter accepts animals without fees, waiting lists, appointments, or other restrictions – the hale and the ill, the bright-eyed, the lame, the aggressive, and those already on their last legs – and, if placement is not possible, provides a dignified and painless end-of-life for those animals which limited admission “no-kill” shelters refuse to serve because the animals are not easily adoptable and which would adversely affect their “saved” statistics.

6. PETA also provides a variety of free outreach, educational, and other services to less affluent, often impoverished, communities through its Community Animal Project (“CAP”). A number of years ago, PETA became aware of unlawful and horrific practices taking place in some localities where no accessible and/or affordable euthanasia services were available to provide a dignified end-of-life experience for domestic animals: *e.g.*, old, injured, or simply unwanted dogs were shot in the back of the head, gassed *en masse* in a rusted, windowless old metal box, or simply abandoned or forced to suffocate to death on a paralytic drug. Accordingly, PETA's CAP allows for the surrender or capture of unwanted or feral companion animals. Those who can be placed for adoption, are adopted out by PETA or placed with other sheltering facilities, but those who are not adoptable – due to age, disease, temperament, aggression, feral status, or other factors – are put to sleep gently and with dignity.

7. Defendant Heidi Meinzer is a resident of, and a practicing attorney, in the City of Alexandria, Virginia. She serves as the Vice President and a Board member of the Virginia Federation of Humane Societies (VFHS), an association that accepts select groups and individuals through paid participation. Meinzer is one of the original organizers of the conspiracy to harm PeTA and has a personal animosity and malice towards the organization. Meinzer is a proponent of "no kill" and limited admission animal shelters, which only take animals suitable for adoption. As such, she exhibits no concern for the welfare and rights of those animals that are not adoptable. Upon information and belief, Meinzer has no experience in running or operating an animal shelter and the actions she personally took in furtherance of the conspiracy and with respect to VFHS were for her own financial and career advancement and not for the benefit of any companion animals.

8. William Gomma is a resident of the District of Columbia and presently teaches in public schools in the District of Columbia. At times relevant to this Complaint, Gomma was licensed to practice law in the Commonwealth of Virginia. Gomma is the Secretary and a Board member of the VFHS and was one of the organizers and initial conspirators of the conspiracy complained of herein. His initial involvement in the conspiracy was as a Board member of VFHS and an employee of Alley Cat Allies in the State of Maryland. His involvement continued after he left the employ of Alley Cat Allies. Like co-conspirators Debra Griggs (*see infra*) and Meinzer, defendant Gomma has a longstanding animosity and hatred towards PeTA. He openly professes a "no kill" and limited admission philosophy for animal shelters. By opposing open admission shelters, he ignores the welfare of numerous companion animals who are not adoptable and because of age, illness, or other factors are not accepted at "no kill" ("limited admission") facilities or by "no kill" organizations.

9. Defendant Edward Armstrong ("Armstrong" or "Mr. Armstrong") is a resident of Accomack County, Virginia. Armstrong is a convicted felon who served seven years in the Michigan State Penitentiary for robbery and attempted murder. While in prison, he obtained his GED. After moving to the Eastern Shore several years ago, he has fraudulently held himself out as a successful businessman. Upon information and belief, Armstrong has preyed upon the substantial Hispanic and immigrant community on the Eastern Shore of Virginia. At first, Armstrong sought to open a casino. When that proved unsuccessful, he opened a night club for the migrant community. After the night club failed, he opened a Mexican restaurant in Parksley, Accomack County, Virginia, which also failed. Although Armstrong claimed to be the owner of these businesses, they all were registered or owned in his wife's name to conceal the fact that he was a convicted felon. Over the course of these failed businesses, more than \$70,000.00 in federal and state liens were imposed upon Armstrong's wife (co-defendant Julliana Armstrong), and some were imposed upon him.

10. Following the failure of his restaurant, Armstrong and his wife opened a tax service, which caters to the Hispanic and immigrant community and with, apparently, largely undocumented illegal immigrants.<sup>1</sup> Even though he has no degrees in finance, Armstrong also registered dozens of domain names and established numerous websites (over thirty) soliciting individuals to provide him with funds so that he can advise them on wealth management. Neither Armstrong nor his wife had any training to run a tax business or to advise on wealth management, and it appears that they are engaged in unlawful activities with respect to undocumented immigrants and are receiving tens of thousands of dollars of unreported funds.

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<sup>1</sup> PeTA takes no position and seeks no relief or action against any individuals named herein because of their immigration status. However, it is relevant to the activities of the conspirators.

11. In the course of his activities involving the Hispanic and immigrant community, Armstrong conspired with his wife to pay co-conspirator Wilber Zarate, an undocumented immigrant, thousands of dollars in cash to collude with them and assist them in their apparently improper activities with the Hispanic community and for their own financial benefit. Thus, the Armstrongs provided false information to authorities (including a doctored video) about the taking of Zarate's mixed breed dog and sought to initiate false criminal charges. They then participated in a lawsuit that included bogus claims against PeTA and individuals working with PeTA. As set forth *infra*, the Armstrongs and Zarate joined with defendants Meinzer and Gornaa and the VFHS and the Richmond SPCA conspirators listed below to harm PeTA and individuals associated with PeTA in their endeavors as set forth *infra*.

12. Defendant Julliana Armstrong ("Mrs. Armstrong" or "Julliana Armstrong") is a resident of Accomack County, Virginia, and claims to be the wife of Edward Armstrong. She apparently has used a number of false names (aliases) and had no background or training for the type of tax, immigration, and other services she professes to provide to the Hispanic and immigrant community in the Eastern Shore of Virginia. Throughout the conspiracy described herein, she worked closely with Edward Armstrong and adopted and participated in all his actions as described above and *infra*, which actions are adopted as if fully set forth herein. She has assisted Edward Armstrong in his fraudulent and apparently criminal activities and helped conceal his criminal background. She has paid thousands of dollars in unreported funds to Wilber Zarate to assist the Armstrongs in their endeavors. She joined with Edward Armstrong and Zarate in providing false information to local authorities about Zarate's dog and in seeking false charges to be filed against those persons associated with PeTA. She joined with Edward Armstrong and Zarate and fully participated in the conspiracy with defendants Meinzer and Gornaa, as well as the

VFHS and Richmond SPCA conspirators to damage PeTA and those associated with PeTA in their business endeavors.

### CO-CONSPIRATORS

#### **VFHS Conspirators**

13. Debra Griggs ("Griggs") resides in the City of Norfolk, Virginia and is a realtor with Remax in Norfolk, Virginia. For several years she has been President and a Board member of VFHS. She previously had some experience as a part-time volunteer doing animal rescue work in the Tidewater area and was a co-founder of a group known as No Kill Hampton Roads, which is apparently only a website. Upon information and belief, Griggs has no experience in operating or running an animal shelter and her part-time duties at VFHS are administrative. She seeks to convert all shelters to "no kill" and limited admission, and ignores the needs of old, sick, or otherwise unadoptable companion animals. She espouses the return of feral cats to the wild in violation of Virginia law. For many years she has demonized PeTA, spreading outrageous lies about PeTA and the work it performs. She has been vicious and malicious towards PeTA and PeTA's employees and agents, and has made it her goal to destroy PeTA. As set forth *infra*, she was the key organizer and main actor in the conspiracy complained of herein and has held herself out as a representative of Remax (a real estate company) in some of her actions in the conspiracy.

#### **Richmond SPCA Conspirators**

14. Robin Starr ("Starr") is a resident of Richmond, Virginia and an attorney licensed to practice in the Commonwealth of Virginia. She is a full time employee and Chief Executive Officer of the Richmond Society for the Prevention of Cruelty to Animals (Richmond SPCA). Like Meinzer, Griggs, and Gomas she has a long time enmity towards PeTA and for a number of years has publically expressed her malice and animosity and hatred of PeTA. She is one of the

initial planners and originators of the conspiracy and scheme complained of herein. Similar to Meinzer, Griggs, and Gornaa, she holds herself out as a vigorous proponent of, and having a commitment to, "no kill" ("limited admission") shelters. Her actions, however, are adverse to the benefit and well-being of tens of thousands of companion animals in Virginia and millions of animals across the United States who are too sick, too old, or otherwise non-adoptable. Unlike Meinzer, Griggs, and Gornaa, she runs a program directly involved in the adoption of companion animals, which is a closed door shelter (characterized by her as "limited admission" shelter). The Richmond SPCA mission statement specifies that the organization does not accept strays, and receives 80% of its animals from local pounds that the Richmond SPCA specifically selects and who comprise only healthy, treatable animals. Only 20% of the animals are obtained from the public and many animals are turned away or placed on a waiting list, contrary to the best interests of those companion animals. Starr's and the Richmond SPCA's position on feral cats (to return them to the wild) also is contrary to state law and scientific evidence. Starr has a substantial personal financial interest in seeking to destroy or drive PeTA out of the Commonwealth of Virginia. Her shelter, supported through private funds and donations, receives *per capita* multiples of funds compared to the other shelters in Virginia. She personally receives remuneration of a quarter of a million dollars a year in salary and benefits which is multiples of the remuneration received by other persons who run shelters throughout the Commonwealth. Her shelter engages in substantial fundraising efforts and a significant reason for her attack on PeTA is to divert donations from PeTA to her pocket and that of her shelter.

15. Tamsen Kingry ("Kingry") and Tabitha Hanes Treloar (who was previously, as set forth in various documents, known as Tabitha Hanes) ("Hanes-Treloar"), live in Richmond, Virginia. Both Kingry and Hanes-Treloar are employed full time by the Richmond SPCA and are

two chief administrators of the organization with Kingry as the Chief Operating Officer and Hanes-Treloar as the Director of Communications. Kingry also is on the Board of the VFHS. At all times relevant to the Complaint, each acted individually and upon the instructions of Starr. Both are proponents of the so-called "no kill" movement. In espousing a closed-door philosophy and running a closed-door facility (the Richmond SPCA), they operate contrary to the welfare and best interests of myriad companion animals in Virginia and nationally who are ill, unwanted, otherwise needy, or considered under the Richmond SPCA's mission statement to be not adoptable. Kingry and Hanes-Treloar joined the conspiracy, set forth *infra*, in its very early stages and actively participated, both individually and while being paid by and during working hours of the Richmond SPCA.

#### **Additional Conspirators**

16. Wilber Zarate ("Zarate") is an undocumented immigrant from Mexico who resides in Parksley, Accomack County, Virginia. During the inception of the conspiracy set forth herein, Zarate and his family and numerous other relatives, apparently all of whom are undocumented, previously lived in a trailer park in Parksley, Virginia known as Dreamland 2. Zarate, who claims to work for minimum wage on the night shift of a chicken processing plant, was paid tens of thousands of dollars in cash by the Armstrongs to assist them in their apparently illegal enterprises. He joined with the Armstrongs in providing false information to local authorities to seek improper criminal prosecutions and to extort money from PeTA. He conspired with the Armstrongs not only to provide false information to the authorities and the public in an attempt to extort money from PeTA, but also conspired with the Armstrongs and other conspirators named herein, to destroy the original evidence that would demonstrate the false nature of their allegations. He and

the Armstrongs joined together with Griggs and the other organizational conspirators as set forth *infra* to harm PeTA.

17. William Shewmake ("Shewmake") is a resident of Midlothian, Virginia and an attorney with the law firm of LeClairRyan in Richmond, Virginia. Upon information and belief, Shewmake specializes in zoning law and has no special expertise in animal welfare law, although prior to entering into the current conspiracy he handled one case on appeal at the request of the Richmond SPCA. Starr and Griggs requested that Shewmake join the conspiracy to harm PeTA in its business endeavors. Shewmake did so to seek personal aggrandizement and to benefit the finances and client base of himself and his law firm. He filed a bogus lawsuit naming Zarate and his daughter Cynthia Zarate Tovilla as plaintiffs against PeTA and two individuals. Shewmake purposely included fabricated and incendiary allegations in the lawsuit which were contrary to law and were included solely to engender false and harmful publicity against PeTA. Even after the court dismissed major allegations of the complaint with the right to amend, Shewmake refused to remove the false and incendiary allegations which by then had been demonstrated to be false. Additionally, Shewmake fabricated facts to support demands for discovery from PeTA, solely to benefit the conspirators in their enmity of PeTA and in their efforts to destroy PeTA and/or harm the organization in its business endeavors. Contrary to the best interests of the Zrates, who were his clients, Shewmake failed to disclose serious conflicts of interest in also representing the interests of the Richmond SPCA, as well as other conspirators.

18. John ("Jack") Robb, III ("Robb") is a resident of Richmond, Virginia and at times relevant to this complaint was an attorney with the law firm of LeClairRyan in Richmond, Virginia. With Shewmake, Robb engaged in the same activities for the same motives as Shewmake. The allegations concerning Shewmake, therefore, are adopted herein as if fully set

forth as to Robb. Additionally, Robb requested the other conspirators to publicize his name as representing the Zarates against PeTA for his personal financial benefit. He also is directly associated with the Richmond SPCA conspirators by representing the Richmond SPCA in the prior appeal noted above, and because his wife, who also is a lawyer, is on the Board of Directors. Robb also has listed the Richmond SPCA as a client, and he has claimed that he serves as a volunteer.

19. Nathan Winograd ("Winograd") and the No Kill Advocacy Center ("NKAC"). Nathan Winograd is a law school graduate who does not practice law and who resides in Oakland, California. He is the founder of the No Kill Advocacy Center, which is registered as a 501(c)(3) organization also located in Oakland, California. Winograd apparently is the only employee of NKAC and the entire operation apparently is run out of his home with the assistance of his wife. For a long period of time, Winograd has expressed his hatred of PeTA, similar to some of the other conspirators who espouse a "no kill" philosophy, which, in reality, is a "horribly-kill" philosophy for millions of animals who are old, sick, unwanted, or otherwise unadoptable or homeless.

In promoting himself, Winograd has falsely represented his endeavors in allegedly establishing a few shelters around the country and the alleged accomplishments of those shelters. He operates NKAC only for his own benefit and raises funds (which are his only apparent source of income) by attacking PeTA and other groups such as the Humane Society of the United States (HSUS) and the American Society for Prevention of Cruelty to Animals (ASPCA). Winograd does not run any programs or shelters. Winograd has a long history of espousing animosity and personal hatred and malice towards PeTA and providing and publicizing false information concerning PeTA. He has taken these actions, including joining in with Griggs, Starr, and the other conspirators in efforts to harm PeTA. All of Winograd's actions were performed individually and on behalf of NKAC.

20. Heather Harper-Troje ("Harper-Troje") is an American citizen who resides, upon information and belief, in Honduras where her husband, Eric Turner, is an employee at the United States Embassy. She has no experience running a shelter or an animal welfare organization. For several months in 1999-2000, she worked at PeTA, before PeTA established a shelter in Virginia and operated its Community Animal Project as it is presently established to assist with animal welfare in neighboring communities around PeTA's office in Norfolk, Virginia. She worked in animal rescue for a few months and then engaged in criminal activity and other actions contrary to her employment and for which she was fired in early 2000. Upon information and belief, between 2000 and early 2015, she was not involved in any animal welfare work nor had any involvement with PeTA. In early 2015, upon learning of the efforts of the conspirators above, she joined the conspirators, principally Starr, Griggs, and Winograd, to harm PeTA in its business endeavors. Her husband (Eric Turner) joined with Harper-Troje in these efforts to injure PeTA, and in providing to the public both false and inflammatory information. In assisting the other conspirators, Harper-Troje and her husband acted with malice and malicious intent.

21. Each of the conspirators in joining the conspiracy and in conspiring with each other acted as an agent of the other members of the conspiracy in carrying out its purpose to harm PeTA and, as a consequence, are fully responsible for the reasonably foreseen actions of all the other conspirators in furtherance of their common purpose.

### STATEMENT OF FACTS

#### **PeTA Responds to Request to Remove Dogs Running Loose**

22. In or about 2012, a serious problem developed in Accomack County, Virginia involving feral animals running loose. A pack of dogs, in and around a trailer park in Parksley, Virginia (Dreamland 2 Trailer Park), were attacking children, adults, farm animals, wild animals,

and other domestic animals. This pack, together with feral cats, also caused a major concern with the spread of disease, including rabies. The Sheriff had sought to trap some of the animals, but lacked resources and facilities to adequately deal with the problem. The problem became so serious that, on more than one occasion, the issue was considered by the Accomack County Board of Supervisors.

23. By the Summer of 2014, the feral pack had attacked farm animals on farms and properties neighboring Dreamland 2 causing serious damage. Because the Sheriff had failed to provide adequate and continued assistance, one farmer sought PeTA's assistance to deal with the problem. PeTA personnel interviewed the farmer, and PeTA sent a contractor, who was assisting PeTA with field work involving animals, to investigate the matter to determine if PeTA could render assistance. PeTA's actions were done as a public service and without any charge.

24. Between August and October 2014, the contractor (Victoria Carey) made several trips to Dreamland 2. Ms. Carey spoke with the owner of the trailer park and went to each trailer with a manager from the park. The owner of the trailer park, the trailer park residents with whom Ms. Carey spoke, and the neighboring property owners requested that PeTA pick up and remove all the dogs that were running at large and the feral cats. The dogs constituted a physical threat, as they were running at large without identification or license or proper vaccinations (contrary to state law) and did not have microchips or any other form of identification. Numerous residents, who had been acting as the dogs' caretakers and custodians, signed give-up forms authorizing the pick-up, removal, and euthanasia of the unidentified dogs that were running at large in or about their properties. These actions were consistent with the directive of the owner of the trailer park, as well as the property leases, that limited each trailer to one dog who had to be kept restrained or indoors. Further, when the Accomack County Sheriff's Office picked up a handful of dogs previously, they

also had residents who had acted as caretakers and custodians sign such give-up forms, which legally allowed immediate disposition of the animals. In addition, both local ordinance and state law made it unlawful to allow dogs to run at large.

25. By the end of September 2014, Ms. Carey, in conjunction with various PeTA personnel or volunteers, had provided significant services to the trailer park, its residents, and the residents' animals. They picked up and removed a number of the dogs that were running loose; delivered dog houses to residents who did not have adequate or any shelter for animals restrained outdoors; delivered lengthy, lightweight tethers to replace short and/or heavy chains; arranged for proper deworming and other anti-parasitic medications and/or vaccinations; provided food and toys for dogs, all free of charge; and provided free spay/neuter services for dogs, including free transportation to and from Norfolk.

26. On September 17, 2014, Ms. Carey visited the trailer at which Zarate lived with his wife, children, and parents. Zarate was not present that day. There were two outside dogs (in violation of the lease) who were restrained and neither was adequately treated nor housed. At the request of the residents at the Zarate trailer, Ms. Carey and a PeTA volunteer returned a few days later with a free doghouse and lengthy tether. At that time, Zarate was present, and he asked the volunteer with Ms. Carey to remove feral cats living under the trailer, which could spread disease to his children. As Ms. Carey did not have traps on that day, Zarate signed a formal give-up form for someone to return to the trailer and pick up the cats. The form, which was explained to Zarate in Spanish, permitted immediate euthanasia.

27. On October 18, 2014, Ms. Carey and a PeTA volunteer (Jennifer Woods) returned to the Zarate trailer to trap the cats and to further attend to the outside dogs, in addition to providing other services throughout the trailer park. As Ms. Carey approached the property, she saw a mixed

breed Chihuahua running loose in the roadway. The dog had no identification, and consistent with her directive from the trailer park owner, numerous trailer park residents, the practice over the prior few months, and specific written authorization (give-up form) from a resident of the park, Ms. Carey sought to catch the dog, but was unsuccessful. She and Ms. Woods attended to the two outside dogs at the Zarate trailer and to dogs at two neighboring trailers. They also were able to trap two of the feral cats under the Zarate trailer.

28. During this time, the mixed breed Chihuahua continued to run loose, had removed food from and around the traps around the side of the trailer, and had then run onto the small, covered entrance deck of the Zarate trailer. There was nothing on the deck to indicate any ownership of the dog, including no water or food bowls. Consistent with her directive to pick up unidentified dogs running at large, Ms. Carey removed the dog and returned to PeTA with the other animals (including the two cats) she had picked up during her time at the trailer park. One of the other dogs previously had attacked an elderly resident in the trailer park, and her son specifically requested that the dog be removed. When the mixed-breed Chihuahua was taken by PeTA, the dog was euthanized consistent with the give-up form that Ms. Carey submitted.

29. When Zarate, who later claimed to own the mixed breed Chihuahua, returned to the trailer that evening (after being gone for 10 hours with his family), he failed to find the dog he had left running at large. Zarate viewed footage from his security camera. That footage showed that when Zarate and his family left the area on October 18, 2014, the dog was running loose in the parking area along the road without any collar or other identification. The footage also showed that the dog continued to run loose and had been picked up by Ms. Carey in a clearly marked PeTA van.

30. The Zarates had a third party contact PeTA and claimed that they owned the dog. PeTA promptly had a supervisor go to Accomack and inform Zarate that the dog had been mistakenly euthanized as being an animal whose owner had signed a give-up form. As the give-up form was not signed by a specific owner of the dog (although ownership was not known or apparent), it ultimately turned out that the dog should have been held for five days.

31. Both PeTA and the Virginia Department of Agriculture and Consumer Services ("VDACS") acknowledged that PeTA had made a mistake in not holding the Zarate dog for five days. However, PeTA, as acknowledged by VDACS, had taken immediate corrective action, and VDACS imposed a \$500 fine. It was acknowledged that in the nearly two decades that PeTA had run a shelter, this was the first violation in the history of its operation.

#### **Zarate Conspires With Armstrongs to Enrich Themselves By Attacking PeTA**

32. After learning that a mistake had been made, Zarate and defendants and co-conspirators Edward and Julliana Armstrong decided to engage in a conspiracy to use the police and criminal prosecutions to wrongfully enrich themselves and benefit from the taking of the dog.

33. To carry out their scheme against PeTA, the Armstrongs and Zarate purposely provided false information to the Accomack County Sheriff's office to induce a wrongful prosecution of Ms . Carey and Woods. Instrumental to this false claim, Zarate and the Armstrongs provided edited video footage from the security camera from which key factual data (including the fact that the dog had been running at large off the property) had been intentionally removed.

34. Zarate apparently had the security camera installed because Zarate kept tens of thousands of dollars of cash in his trailer. This amount of money did not come from Zarate's adult relatives, who were all undocumented immigrants working at minimum wage. Rather, upon

information and belief, the monies came from enterprises that preyed upon other undocumented immigrants in which Zarate and the Armstrongs were involved.

35. Based on the false information provided by Zarate and the Armstrongs, the Sheriff referred the matter to the Commonwealth Attorney. The Sheriff, who later admitted having a personal hatred of PeTA and assisted in the conspiracy against PeTA, nonetheless falsely caused an averment under oath that there was probable cause to issue felony warrants against Mses. Carey and Woods.

36. Upon learning that felony warrants had been issued and after a full inquiry, the Commonwealth Attorney *sua sponte* dismissed (*nolle prosequi*) the warrants and refused to prosecute, concluding that no criminal activity had occurred. Conspirators Zarate and the Armstrongs thereafter, again in pursuing their illegal activities, sought extensive publicity to have the Commonwealth Attorney's decision reversed in order to enhance their position in the Hispanic community and to enrich themselves.

**Meinzer, Goma, Organizational Conspirators, and Winograd Join Conspiracy to Injure PeTA**

37. In mid-November 2014, Griggs saw references to the publicity engendered by the Armstrongs and Zarate. Griggs has a long history of attacking PeTA and knowingly or with reckless disregard for the truth making false allegations about PeTA not only privately, but also to the general public and to Virginia state authorities in order to injure PeTA in its endeavors and business. She did this both individually, because her own views are skewed and contrary to state law regarding the treatment of animals, and on behalf of the Virginia Federation of Humane Societies (VFHS) of which she is the President and a Board member, even though she has no experience to operate any humane society or shelter. Griggs immediately contacted an Assistant

Virginia Attorney General who previously was on the VFHS Board, as well as defendants Meinzer and Gornaa, and co-conspirator Starr, to improperly seek their assistance in attacking PeTA.

38. At the time, defendant Meinzer was Vice President and Board member of the VFHS and an attorney in private practice in Alexandria, Virginia. Defendant Gornaa (also an attorney) was an officer and member of the Board of VFHS and also worked for Alley Cat Allies in Maryland.

39. In response to Griggs' contact, Starr joined this conspiracy, along with Kingry and Hanes-Treloar, who worked under Starr at the Richmond SPCA.

40. The efforts by Starr, Kingry, and Hanes-Treloar were totally unrelated to their duties as employees of the Richmond SPCA, and were not within any of the normal activities of the organization. In joining the conspiracy to seek to harm PeTA, Starr, Kingry, and Hanes-Treloar exceeded their duties with, and their obligations to, the Richmond SPCA. Although Starr, Kingry, and Hanes-Treloar constitute the three top executives at the Richmond SPCA, they spent considerable time and effort pursuing the conspiracy against PeTA while they were being paid by the Richmond SPCA to do other tasks and using funds donated to the Richmond SPCA for other purposes.

41. Following Griggs' contact, these six conspirators from both the Richmond SPCA (Starr, Kingry, and Hanes-Treloar) and the VFHS (Griggs, Meinzer, and Gornaa) (hereinafter the "organizational conspirators") for the next several days, had extensive communications with each other and with the Assistant Virginia Attorney General (who agreed to render assistance) to wrongfully malign and harm PeTA; to seek the filing of false criminal charges against the individuals who were providing requested services at Dreamland 2 on behalf of PeTA; and to

cause a bogus civil suit to be filed by the Zarates against PeTA for the wrongful purpose of obtaining non-public information as to PeTA's operations and to destroy the organization.

42. Thus, upon learning that the Sheriff of Accomack County bore animosity toward PeTA and wanted to pursue a criminal prosecution, these six organizational conspirators enlisted the Sheriff in the conspiracy.

43. At Starr's suggestion, the six individual organizational conspirators, acting individually and on behalf of the their organizations, and the Assistant Virginia Attorney General agreed to pressure the Commonwealth Attorney to pursue charges against Ms. Carey and Ms. Woods. The conspirators also agreed to cover up the participation of the Assistant Virginia Attorney General, removing her from their email chain, but continuing to otherwise communicate with her privately. At the same time, Griggs established contact with the Armstrongs and sought to establish contact with Zarate.

44. To move forward with their conspiracy to injure PeTA in its endeavors and business, the six organizational conspirators decided to have an attorney represent Zarate in a civil suit against PeTA. To that end, they had frequent conversations with the Armstrongs and sought to set up a meeting with Zarate.

45. Meinzer and Gomaa, both lawyers, agreed to pursue plans for the lawsuit, while Griggs communicated with the Sheriff and local residents. Accordingly, still within the first week and after dozens of emails over a four to five day period, defendants Meinzer and Gomaa, and Griggs and Starr (along with co-conspirators Kingry and Hanes-Treloar) set up meetings with the Sheriff, the Armstrongs, and Zarate (all in Accomack County, Virginia, far from where they operated). They also began to solicit local and national press to malign and attack PeTA.

46. As a result of these actions, defendants Meinzer and Gornaa, along with the other organizational conspirators from the VFHS and the Richmond SPCA, joined with the Zarate and Armstrong conspirators in their actions to injure PeTA. In doing so, they chose to totally ignore the clear evidence that the Armstrongs were fraudsters, preying upon the local Hispanic immigrant community. Juliana Armstrong, who allegedly ran a tax service for which she did not have adequate education, training, or experience, apparently has used at least one alias and had over \$70,000 in federal and state government liens against her, which were registered in the local courthouse and apparently related to wrongful conduct involving illegal aliens. Armstrong had no employment, but had registered dozens of domain names and operated dozens of websites advertising services for high level economic consultation, even though he has no apparent background or education to provide such services.

47. Also within this first week, Griggs reached out to conspirator Winograd who resides in California and who agreed to keep their contacts secret. Winograd agreed to join in the conspiracy to injure PeTA in its endeavors and business by knowingly or with reckless disregard for the truth disseminating false information to the press and directly to the public; having a bogus lawsuit filed against PeTA; and having false criminal charges brought against persons working with PeTA. Winograd and Griggs have a history of conspiring and colluding to destroy PeTA over a number of years, including making false attacks on PeTA to public authorities in Virginia.

48. Still within this first week of defendants Meinzer and Gornaa, Griggs, and the organizational conspirators initiating their attack on PeTA, Gornaa conducted a telephonic interview with Edward Armstrong. During the call, Zarate, who did not generally speak or understand English, was present with Armstrong. Based upon that interview, Gornaa prepared an extensive timeline, and provided it to others in the conspiracy. Neither Gornaa, nor any of the

other conspirators, because of their animus, made any effort to check the allegations or the truth of the information supplied by Armstrong and/or Zarate, even though Gomaa noted in his report that the information required checking. As a result, the timeline is fraught with total falsehoods that are without any basis.

49. In pursuing these activities over several days, it was the specific intent of defendants Meinzer and Gomaa and conspirators Griggs, Starr, Kingry, Hanes-Treloar, and the purpose of their conspiracy to damage PeTA in its membership and fundraising; to force PeTA to leave the Commonwealth of Virginia; and to drive PeTA out of business.

**Attorneys Shewmake and Robb Join Conspiracy to File Baseless Lawsuit and Conceal Evidence**

50. By the end of the first week of these conspiratorial activities, Starr reached out to attorneys William Shewmake and John Robb and to the law firm LeClairRyan to solicit their participation in the conspiracy to destroy PeTA. Shewmake, Robb, and LeClairRyan previously had represented Starr and the Richmond SPCA, and Robb's wife was and is a Board member of the Richmond SPCA. All of the conspirators shared the edited security camera footage (which eliminated the portions showing the dog running at large) that had been provided to the Sheriff and the press by the Armstrongs and Zarate. The conspirators, however, were informed that there was much more footage. They purposely and consciously failed to disclose that information publicly and participated in spoliation of this vital evidence to conceal it from the authorities, the public, and from PeTA in any future litigation.

51. At the same time that Starr and the Richmond SPCA were soliciting the attorneys to join the conspiracy, Winograd continued to become more deeply involved. He sought to obtain information from Edward Armstrong and to have Griggs supply him with false information that he could publicize.

52. By this time, Griggs, Starr, and the LeClairRyan lawyers were provided with the longer and more accurate security camera footage that was concealed from the public and authorities.

53. Knowing that they were operating fraudulently and illegally, Griggs and Winograd agreed during this first week to try to keep their names out of any litigation or future disclosure, and to conceal their involvement. By the beginning of the second week of Griggs' involvement, attorney Shewmake, on behalf of the LeClairRyan firm, became deeply involved in numerous email communications with the other conspirators. Significantly, Shewmake apparently had no personal contact with Zarate who was supposed to be his client.

#### **Conspirators Launch an Attack on Commonwealth Attorney**

54. By the beginning of the second week, the conspirators, acting with the cooperation of the Sheriff and an Assistant Virginia Attorney General who was secretly helping them, all agreed to launch an attack on the Commonwealth Attorney because he had decided there was no merit to any charges against Mses. Carey and Woods. Members of the conspiracy from the Tidewater area, Richmond, Alexandria, and Maryland agreed to travel to Accomack and attend a public demonstration against the Accomack County Commonwealth Attorney (Gary Agar). Some were to speak at the demonstration. Some would meet with the Sheriff. Some would meet with representatives of the television program *Inside Edition* and other press. Some would meet with the Armstrongs and Zarate. All of this occurred hundreds of miles from where the conspirators lived and worked.

55. The activities in which the conspirators engaged were all performed with the specific intent to wrongfully harm PcTA and were outside the scope of their regular employment and duties. Thus, to justify her actions in using VFHS resources to seek to destroy PcTA, Griggs

knowingly or with reckless disregard for the truth provided false information to the VFHS Board about PeTA and the Accomack matter.

56. On November 24, 2014 -- eleven days after Griggs first became involved and after extensive communications among the conspirators -- several of the organizational conspirators went to Accomack and participated in a rally against the Commonwealth Attorney, of which Armstrong was the principal on-site organizer and with their assistance. There was also a meeting by several representatives of the conspiracy with the Sheriff of Accomack County. At that meeting, it was apparently falsely alleged that the Commonwealth Attorney had not investigated the matter and had been improperly influenced not to bring charges. It was also acknowledged that a member of the Virginia Attorney General's Office was assisting the conspirators.

#### **Conspirators Pursue Multiple Avenues to Harm PeTA**

57. That same day, at a meeting between some of the co-conspirators, Edward Armstrong, and Zarate, it was made known that Zarate had asked PeTA to come to his trailer to pick up cats; that the lease did not allow dogs to roam freely in the trailer park; that on the day in question Zarate knowingly left the dog running at large without identification when he and his family were gone for ten hours; that the dog did not have vaccinations and had no collar or ID; and that there were many dogs running loose in the trailer park, including feral dogs. They were also made aware that despite the fact that Zarate was an undocumented immigrant and was a manual laborer at Perduc, he owned two homes free and clear.

58. Notwithstanding this information exonerating PeTA from wrongdoing, the conspirators decided to move forward with their efforts to shut down PeTA's operations. Most significantly, it was decided that the conspirators would seek state administrative action against PeTA and have LeClairRyan bring a lawsuit in Zarate's name in order to harm PeTA and obtain

discovery about PeTA's operations that was irrelevant in relation to the claims to be alleged regarding the Zarate dog, but relevant to the conspirators' intent to harm the organization.

59. In meeting with the Armstrongs and Zarate, and in order to advance their own agenda, the conspirators and principally defendants Meinzer and Goma fraudulently sought to convince Zarate that he should pursue a lawsuit against PeTA from which he would get lots of money. The conspirators informed Zarate (who was not fluent in English) that they would have a big, prestigious law firm represent him, but fraudulently, they failed to disclose the law firm's ties to both the Richmond SPCA and Starr and the conflicts those ties would present. On that day, it was apparently concluded among the conspirators that they would: (a) have Shewmake from LeClairRyan contact Zarate to initiate a lawsuit; (b) have Starr and Griggs pursue with the Commonwealth of Virginia administrative sanctions against PeTA (but they would falsely cover up the fact that the dog was running at large without any identification); (c) have Starr post negative blogs about PeTA; (d) have Griggs provide false information to various shelters and humane societies which participated in VFHS; and (e) take other steps to garner adverse media coverage of PeTA.

60. Later that same day the Richmond SPCA conspirators communicated with Shewmake and Robb to arrange a meeting with Zarate.

61. During this period, the conspirators all recognized that the adult Zarate family members were undocumented immigrants and that using them to pursue a lawsuit to attack PeTA placed the Zarates in great jeopardy. Nonetheless, they decided to ignore this concern, and to convince Zarate to proceed with a lawsuit by emphasizing the great monetary benefit that would allegedly inure to him. They also sought, through LeClairRyan, to conceal the Zarates' undocumented immigrant status from the authorities, the Court, PeTA, and the public.

62. Griggs then reached out to Winograd and fully briefed him about the actions and conclusions reached in the meetings described above. Again, they agreed that these contacts would be concealed and kept confidential. Griggs exchanged extensive emails with Winograd, including providing information wrongfully disclosed to her by a member of the Accomack County Sheriff's Office. They discussed obtaining personal misinformation on senior personnel at PeTA in order to attack them, which was unrelated to the dog or to Zarate. Griggs acknowledged to Winograd that Zarate could be deported. Nonetheless and contrary to Zarate's best interest, the conspirators lured him into a fraudulent lawsuit. Indeed, it would be later learned that Zarate did not even see the complaint until eight months after it was filed, contrary to ethical requirements.

63. In early December, 2014, Griggs, Starr, and the organizational conspirators further pressed Shewmake and Robb at LeClairRyan to bring a lawsuit on Zarate's behalf against PeTA. By December, 2014, the conspirators also had fully launched their campaign to engender false and adverse publicity against PeTA, which they would use to sway local votes against PeTA in the Norfolk city council.

64. Thereafter, still in early December, there were extensive communications among Shewmake, Robb, and Starr both to attack PeTA via the fraudulent lawsuit and to stop PeTA from conducting business by introducing a bill in the Virginia legislature based on their fraudulent representations relating to the Zarate matter. They again all acknowledged that Zarate was an undocumented immigrant and that the bringing of a lawsuit posed a threat to his immigration status.

65. In discussing using the *Virginian-Pilot* to attack PeTA, Griggs acknowledged she was seeking retribution against PeTA for having exposed misconduct in animal shelters in Virginia.

Starr and Shewmake conspired to keep pressure on PeTA by advertising LeClairRyan's representation.

66. By mid-December 2014, the conspirators knowingly or with reckless disregard for the truth had provided false information to a Virginia State Senator and secured his assistance in attacking PeTA by contacting and meeting with VDACS. During that period, Starr, Griggs, and Winograd conspired to send separate anti-PeTA petitions to VDACS and encouraged others to do so as part of their overall plan to force PeTA out of caring for animals and out of Virginia. They agreed to keep their efforts with each other confidential, because of their impropriety, and discussed putting specific false allegations in the petitions including, *inter alia*, that PeTA purposely waited until the Zarate family was away from home; PeTA attempted to lure the dog off the property in order to claim the dog was a stray (they later agreed to conceal from VDACS that the dog had been roaming at large); and that PeTA picked up the dog thinking no one was around. Starr and Griggs prepared a petition to the Commonwealth of Virginia for Zarate to bring and sought to have Shewmake file it on Zarate's behalf. Upon information and belief, Zarate was not even consulted on that course of action. The conspirators made plain their purpose was to stop PeTA from providing humane euthanasia and from operating a shelter.

67. Also by mid-December 2014, Winograd, Starr, and Griggs exchanged "confidential" communications as to their intent to pursue all avenues to shut down PeTA, including the filing of multiple complaints with VDACS, the Zarate family's pursuit of litigation, and the opening of a legislative front. They had extensive discussions about use of a State Senator for the latter and agreed that even if the bill were not enacted, it would be useful as negative, harmful publicity against PeTA. They discussed having a State Senator introduce a bill that would shut down PeTA's operations.

68. In mid-December, Griggs initiated correspondence directly with the Virginia Attorney General to force a false prosecution of PeTA representatives in Accomack County, Virginia. Griggs took this action because she had not previously succeeded in having the PeTA representatives prosecuted in response to her prior inappropriate contacts with the Assistant Virginia Attorney General whom Griggs had induced to call the Accomack County Commonwealth Attorney, Gary Agar.

69. Throughout the end of December, a draft of a letter from Griggs to the Virginia Attorney General, as well as a potential bill for the legislature, was frequently reviewed and exchanged between the conspirators, including defendants Meinzer and Gomaa. The letter, finally sent in late December, was replete with false and fraudulent allegations about PeTA. To keep pressure on PeTA, Griggs also forwarded copies of the letter to the VFHS Board and to the press. Griggs did so to enlist the aid of VFHS members based on the grossly false information contained in the letter.

70. PeTA is filing an attachment ("Attachment A") which is representative of the many false allegations made by the conspirators and are not at all inclusive. The attachment is being filed as confidential, but is adopted as if fully set forth herein.

71. At the beginning of 2015, Winograd and Griggs agreed to keep confidential from all the others a draft anti-PeTA petition to VIDACS that Winograd was preparing for Griggs' eyes only at that time. Even co-conspirator Starr did not find Winograd to be trustworthy.

72. In their effort to further harm PeTA in its business, defendant Meinzer and co-conspirators Griggs and Starr discussed contacts with PeTA's shelter supervising veterinarian to induce her to repudiate PeTA.

73. By early January 2015, Griggs and Winograd decided that Winograd would place a knowingly false advertisement in local newspapers about the matter in Accomack County, including the fear-mongering language "Is PeTA in your neighborhood [Norfolk], rounding up and killing animals?" There was absolutely no basis for the demonstrably false allegations and suggestions in the ad, which was targeting the Norfolk, Virginia area where PeTA's headquarters is located, with the intent to harm the organization. Griggs announced her position that Norfolk and Hampton Roads were ground central in a fight against PeTA and they were getting national adversaries and writers to focus on that area.

74. During this period Griggs was spending most of her active time on this campaign against PeTA and she expressed concern that she was putting VFHS at risk with the allegations in the ad, acknowledging that she did not have a basis for the allegations and had made no reasonable effort to establish any basis for them. The allegations were nothing more than a means to sully PeTA's activities and to cause it to cease its operations.

75. By late January 2015, Starr was continuing to provide false information to Shewmake and Griggs about PeTA. She also touted her access to the Attorney General and that an individual in the Virginia Attorney General's office, who previously had disagreed with her, lost his job in the current Virginia Attorney General's administration. She discussed Winograd and how she found him repugnant and nasty. Nonetheless, she continued to plot with Winograd and the other conspirators.

#### **Conspirators Pursue Legislative Efforts to Shut Down PeTA by Making False and Fraudulent Statements**

76. In 2015, Griggs, Starr, Goma, and Meinzer, together with others, continued their efforts to garner support in the legislature for a bill to shut down PeTA. Although the conspirators acknowledged among themselves that their legislative efforts were targeted at PeTA to force PeTA

to close its operations in Virginia, they attempted to conceal their purpose. Griggs had Gomaa, along with input from other organization conspirators, develop a "fact" sheet about PeTA that grossly distorted the truth and included false information. This attempt to conceal their true purpose was because, although they had a right to seek legislation reflecting their views on animal handling, they realized it was done corruptly by knowingly and/or with reckless disregard for the truth supplying false information to legislators to achieve the conspirators' tortious and illegal goals with respect to PeTA.

77. The so-called "fact" sheet prepared by Gomaa, was repeatedly circulated between Griggs, Starr, and Gomaa, as well as others, and they discussed how they could use it to bias the legislature against PeTA and get the bill passed in order to harm PeTA.

78. The conspirators successfully induced a State Senator to meet with VDACS in an attempt to seek greater penalties against PeTA for euthanizing the Zarate dog, even though the penalty imposed was established by law. During that meeting, representatives of VDACS discussed contacting an Assistant Attorney General for assistance. VDACS apparently was not informed and did not know that that Assistant had previously been on the Board of the VFHS and previously had assisted the conspirators in seeking information from and pressuring the Accomack County Commonwealth Attorney. VDACS acknowledged, in a document that Griggs later received, that PeTA had been cooperative and forthcoming in admitting a mistake, had no previous shelter violations, and that the treatment of PeTA was similar to the treatment of several other shelters in Virginia where the same mistake had occurred. Despite this, the conspirators continued their maliciously false attacks and plot against PeTA.

79. During this period in late January 2015, conspirators from the Richmond SPCA communicated with Griggs and Gomaa about posting blogs on the internet discussing the bill in

the legislature that was aimed at shutting down PeTA, including information received from the Center for Consumer Freedom, which they acknowledged was a "shell" against the entire animal rights movement. The conspirators posted a 2010 preliminary report from a member of the State Veterinarian's office as to PeTA's status as a shelter. However, the conspirators purposely did not disclose that the Virginia Attorney General's office and State Veterinarian had concluded the report was not correct and that the author of the 2010 preliminary report, who had never practiced veterinary medicine, had left the Office of the State Veterinarian and was working for the National Pork Producers Council -- a group that is antithetical to PeTA and other animal rights and animal welfare organizations.

80. By February 2015, Griggs, Starr, and Gornaa, as well as other conspirators, were seeking to secure the support of other independent animal groups in Virginia for their bill to shut down PeTA. However, their efforts were rejected by major animal welfare groups. For instance, the Virginia Animal Control Association (VACA) publicly stated and informed its membership that the testimony secured by these conspirators at the legislature was pointedly and viciously directed against PeTA. VACA pointed out that PeTA accepts animals turned away by other shelters, including by some of the very same people who regularly turn away animals and were now criticizing PeTA; that PeTA has a low to no-cost clinic to provide care to keep animals in homes; PeTA builds and gives away free doghouses to people in need; PeTA provides free straw bedding for animals in winter [PeTA also supplies free parasite control medications in warmer months]; PeTA's SNIP (spay/neuter) vans sterilize thousands of animals each year [more than 10,000]; PeTA has a compassionate euthanasia program and euthanizes a number of animals that other shelters turn away to protect their euthanasia statistics and "save rates".

81. Starr, Griggs, and Gornaa, along with others, then undertook efforts to stop VACA from publicly supporting PeTA. They sought to have Winograd publish derogatory information about VACA and other groups that were opposed to the bill. Despite these threats and attacks, neither VACA nor any other group changed its position.

82. While pursuing the bill, Griggs and Gornaa also sought to encourage newspaper publicity adverse to PeTA. They informed the press that they had not received a response to Griggs' letter to the Virginia Attorney General about PeTA, and they expressed hope that the Virginia Attorney General's staff would be rigorously involved in pursuing a case. However, they failed to disclose that one member of the Animal Law Unit in the Virginia Attorney General's office was married to one of the co-conspirators (one of the lawyers at LeClair Ryan who they were using to bring a private civil suit on behalf of Zarate against PeTA) and who was also on the Board of Directors of the Richmond SPCA. More poignantly, they failed to disclose that the chief of the Animal Law Unit was previously a member of the VFHS Board and had previously assisted them in seeking information and pressuring the Accomack County Commonwealth Attorney.

83. By mid-February 2015, Griggs, Starr, and Gornaa, together with other conspirators, used as a central feature of their false claims against PeTA the fraudulent representation that PeTA purposely went into communities to seek out and pick up animals to euthanize. In fact, PeTA's effort to pick up animals running at large at Dreamland 2 trailer park in Accomack County (an area that PeTA did not previously visit or serve) was a unique, one-time effort by PeTA that was undertaken at the request of local farmers, the Dreamland Trailer Park owner, and the residents of Dreamland 2.

### **Harper-Troje Joins Conspiracy and Makes Defamatory Statements Attacking PeTA**

84. Griggs, Gonia, Meinzer, and Starr further agreed not only to provide false information to the legislature about PeTA purposely picking up animals in residential communities, but also about claims of stealing hunting dogs in Southampton, Virginia almost a decade earlier (charges that were false and for which two PeTA employees were acquitted), and newly publicized, but fifteen year old, false charges made by a former, fired PeTA employee, Heather Harper-Troje.

85. Harper-Troje had not worked for nor been in contact with PeTA for over fifteen years. Prompted by the false publicity generated by the conspirators as to the Zarate matter, however, she wrote and published on the Internet a lengthy blog containing grossly false accusations against PeTA that allegedly occurred fifteen years before. Harper-Troje was employed by PeTA only for several months, and while employed, she stole a dog whom she chose to euthanize. Harper-Troje could not adopt out the stolen animal that, indeed, was likely unsafe, and she chose not to keep the dog herself. She also began refusing to work normal hours which resulted in her termination.

86. Starr pushed her fellow conspirators to try to provide accusations to state delegates that PeTA was a cult that believes animals are miserable living as pets, as well as to convince state delegates and senators that PeTA was crazy. Such allegations are patently false as Starr easily could have known by simply reviewing PeTA's websites, publications, books, and programs to assist with companion animals, as well as by the fact that almost all PeTA employees have companion animals and often bring them to work.

87. As part of the conspiracy, Meinzer agreed to provide to Northern Virginia Delegate K. Robert Krupicka totally false information that PeTA operated a shelter that existed only to round up and kill animals; that PeTA opposes the use of service animals; that PeTA believes that death

was the only way to end cruelty and suffering; that PeTA breaks the law to align themselves with known terrorist organizations; that PeTA scoffs the law and kills animals to make a point; etc.

88. Conspirators Griggs, Starr, Winograd, and Gornia joined with defendant Meinzer in providing false information to state delegates. Griggs established contact with Harper-Troje to join the conspiracy against PeTA and Winograd encouraged Griggs to have both Harper-Troje and Edward Armstrong write to the legislature.

90. By March, 2015, Harper-Troje had fully joined the conspiracy. She filed a specious complaint with VDACS about matters that allegedly occurred fifteen years before and before PeTA had established an animal shelter or its current CAP program in the Tidewater area. VDACS rejected Harper-Troje's complaint, pointing out that PeTA did not even have a shelter when Harper-Troje was employed there. Notwithstanding VDACS' response, Harper-Troje, at Griggs' request and later that of Winograd, continued to supply false, concocted information about PeTA concerning alleged events that were over fifteen years old and falsely pretending that she had current knowledge of PeTA's operations and activities. The conspirators used Harper-Troje, with her knowledge and acquiescence, to tweet and blog false information regarding PeTA.

91. In an effort to continue to harm PeTA, Griggs reached out not only to State Senator Stanley, but also to members of the VFHS Board to write anti-PeTA OpEd pieces. Similarly, Starr was pressing Shewmake and others to have OpEd pieces published. All of these OpEd pieces, as drafted, were based on grossly false information and written with the sole purpose of harming PeTA.

92. Shortly thereafter, VACA publicly acknowledged that the bill (SB 1381) was an attempt by those persons who had issues with PeTA to shut down PeTA's operations, had been submitted as the "I hate PeTA bill," and that the testimony against PeTA was vicious and personal.

### **Conspirators Continue Their Efforts to Corrupt the Legislative Process and Destroy PeTA**

93. In late 2015, a new bill was prepared to be introduced into the next legislative session. Rather than to achieve any valid legislative purpose, the conspirators sought to use the new legislation to harm and destroy PeTA. Griggs, Meinzer, and Starr, together with other conspirators, including Gomaa, violated federal laws by using both the VFHS and the Richmond SPCA to raise political funds in violation of the organizations' 501(c)(3) status. To evade federal law and to cover up their efforts to do so, the conspirators arranged to funnel monies through third parties. They did so expressing the belief to each other that PeTA was under siege and at a tipping point.

94. To carry out their plan, Griggs, Starr, Gomaa, and defendant Meinzer conspired to provide false information to the legislature by omitting statistics from shelters such as the one in Danville, Virginia that did not participate in their efforts to attack PeTA.

95. In the autumn of 2015, Starr knowingly or with reckless disregard for the truth provided false information to induce the Huffington Post to write and publish a false article about PeTA on the Internet. In addition, Griggs was in direct contact with Winograd on how to best publish false and misleading statistics as to the number of animals euthanized at PeTA's shelter to misleadingly portray PeTA as improperly euthanizing an abnormally high number of animals.

96. During the time leading up to the 2016 legislative session, the conspirators regularly conspired with numerous other board members from the VFHS, both to support the enactment of legislation to harm PeTA, and to take personal actions to cause others to "hate" PeTA. The conspirators, together with other Board members of the VFHS, further conspired to encourage major law firms to withdraw from their representation of PeTA by approaching other clients of

those firms. The conspirators conspired in numerous ways with Board members of the VFHS and with Starr to force PeTA to shut down its operations and to leave Virginia.

97. The conspirators, now including various members of the VFHS Board, conspired with Harper-Troje to help the members distribute their attacks on PeTA via Twitter. The conspirators attempted to cover up their actions so it would not appear that the VFHS was behind the Twitter campaign. Among other things, the conspirators used Harper-Troje and her tweets to attack Virginia Senator Orrock for introducing a bill that they did not support while concealing they were behind the on-line attack.

98. Defendant Meinzer in this same period (early January 2016), encouraged the conspirators and the VFHS Board to keep attacking PeTA so PeTA would cease its Virginia operations. Meinzer supported the policy that shelters should not take in every animal, which is contrary to PeTA's philosophy as well as to the decent treatment of animals.

#### **Conspirators Concoct False Allegations and File Lawsuit Against PeTA**

99. To prepare the lawsuit against PeTA to be filed by Zarate, Starr and the other Richmond SPCA conspirators, and possibly other co-conspirators, knowingly or with reckless disregard for the truth provided Shewmake and Robb with false or misleading information for them to use in drafting the bogus lawsuit. They provided the Harper-Troje blog, which concerned alleged events that were fifteen years old and which had been rejected by the State, and the 2010 preliminary report from an employee in the State Veterinarian's office (the Kovich report), which the State Veterinarian had rejected. Not only were these items false or misleading, but even Starr acknowledged they were not on point. They were relevant only to using the lawsuit to smear PeTA and to further the goal of shutting down its operations in Virginia. Moreover, Shewmake and Robb, in violation of their ethical responsibilities, failed to undertake any reasonable inquiry to

substantiate the grossly false allegations prior to and even after including the allegations in pleadings filed with the court.

100. Shewmake contacted PeTA about a planned lawsuit and spoke with PeTA's attorney. Shewmake represented that there were "hours" of video footage from the Zarate security camera on October 18, 2014. He claimed he had reviewed the footage and had copies, but refused to provide the footage to PeTA.

101. In September, 2015, Shewmake and Robb engaged in a mediation with PeTA representatives on the claims they had raised relating to the taking of the Zarate dog. Shewmake insisted that Edward Armstrong participate in the mediation even though they should have known by that time that Armstrong, a convicted attempted murderer, was a fraudster who preyed upon the migrant community. Not only did Shewmake and Robb make no reasonable effort to verify the information supplied by Edward Armstrong, they did not seek to verify the false information from Harper-Troje, Starr, or Griggs. As a consequence, Shewmake, Robb, and LeClairRyan made totally fabricated claims in initiating the mediation and throughout the lawsuit Zarate filed against PeTA and Mses. Carey and Woods a few months later.

102. Immediately following the mediation, Shewmake engaged in a series of emails with Starr. Upon information and belief, Shewmake improperly provided Starr with confidential information secured in the mediation in violation of his commitment to confidentiality.

103. In late November, 2015, Shewmake, Robb, and LeClairRyan filed a lawsuit against PeTA, Victoria Carey, and Jennifer Woods, on behalf of Zarate and his daughter. In doing so, the conspirators further sought to wrongfully advance their cause against PeTA. The major factual allegations in the lawsuit were concocted, fabricated, untrue, and rife with distortion of facts and figures. They were without rational basis and Shewmake and Robb made no effort to check their

validity. They were included not for the purpose of advancing a legal claim on behalf of the Zarates, but rather to use as a vehicle to obtain broad based discovery as to PeTA's operations, finances, and donors in an attempt to benefit the conspiracy and for use in harming PeTA and the individual defendants in their business, livelihood, and professional efforts. Prior to filing, Shewmake and Robb did not even review the Complaint with Zarate, who admitted eight months later at his deposition that he had not seen the complaint until a week before the deposition. Indeed, at his deposition in the lawsuit, Zarate refuted a number of the major "factual" allegations and made plain he was not consulted on them.

104. The complaint purposely used false and highly inflammatory language to place PeTA in a false light and to bring public opprobrium upon the organization. The complaint sought several million dollars in punitive damages even though there was no basis to support such a claim and the law limits punitive damages to \$350,000. The Complaint was drafted in this fashion so as to engender greater publicity about the lawsuit and to heighten the impact of the false and outrageous allegations in the mind of the public, all part of the conspiracy to harm PeTA in its business.

105. The concocted, fabricated, and untrue allegations in the Complaint included, *inter alia*:

9. After getting [the dog], [Zarate] on more than one occasion took [the dog] to a veterinarian clinic, where among others things, [the dog] received her annual vaccinations.

16. ... PeTA detests the concept of domestic animals and pets, and considers pet ownership to be a form of involuntary bondage.

17. Under PeTA's philosophy, it is better to kill lost or stray pets than to find them suitable homes.

18. ... The [animal shelter] facility is a front for a slaughter house that kills cats and dogs.

19. Attached as Exhibit A is a blog report from a former employee of PeTA outline some of the unethical lengths to which PeTA routinely goes to deceive the public concerning its philosophy and its killing of companion animals.
22. Carey and Wood[s] came to the [trailer] Park and began to ingratiate themselves with the residents in order to build trust with the residents.
24. They also told residents that PeTA would be glad to provide vaccinations for the residents' pets ....
25. Carey ... often saw [the dog] with members of [Zarate's] family.
26. PeTA representatives, including Carey, spoke with [Zarate] about [the dog].
27. Carey told [Zarate] that PeTA would be glad to have [the dog] vaccinated.
28. [Zarate] agreed, and based on PeTA's representation and assurance, [Zarate] in 2014 waited for PeTA to provide [the dog] with her annual vaccinations as agreed.
31. PeTA ... took the opportunity to enter the [trailer] Park to surreptitiously take the residents' pets for the purpose of killing them.
32. PeTA believed that given the soci-economic[sic] status of the residents, PeTA could take the pets and kill them without any repercussion to PeTA.
33. On October 18, 2014, PeTA, through its agents and representatives, entered the Park to execute its plan to steal pets in the Park for the purpose of killing them.
35. When she was outside and not with [Zarate's] family, [the dog] stayed on or near [Zarate's] porch.
36. ... [Zarate] owned the mobile home and the porch that was attached to the mobile home.
37. On the morning of October 18, 2014, [Zarate] had gone to the store.
40. [Zarate's] niece told [Zarate] that her dog was also missing. PeTA

knew that the niece's dog belonged to the niece. Upon information and belief, PeTA stole and killed the niece's dog.

41. [Zarate] had installed a security camera on his porch to prevent break-ins of his vehicle.

43. The video revealed that PeTA had first tried to have two children in the neighborhood lure [the dog] off her porch. PeTA had paid the children to lure [the dog] away.

59. On approximately October 21, 2014, Carey and another representative of PeTA came to [Zarate's] house.

61. It was apparent to [Zarate] that the real purpose of the visit was for PeTA to ascertain the location of the security camera and to learn the extent to which PeTA's illegal actions had been captured on video.

62. In an effort to cover up what they did, PeTA falsified and altered documents which they submitted to governmental authorities ....

68. The actions of the defendants set forth herein were part of an established pattern of PeTA, which through its authorized employees, agents, and representatives, routinely kill companion animals in violation of law, regulation and decency.

69. Carey and Wood[s]'s actions were authorized, ratified and condoned by PeTA's executive management.

106. That the real effort in filing the lawsuit was to benefit the conspirators and not the plaintiffs therein (the Zarates) is further demonstrated by the fact that the attorneys and LeClairRyan communicated with the conspirators about matters involving the litigation, not with Zarate. Indeed, attorney Robb requested that Starr ensure the publicity being engendered by the lawsuit include his name to increase his profile as an animal rights lawyer.

107. Shewmake and Robb did not serve the Complaint at the time it was filed in November 2015, and only served PeTA in March 2016 without ever seeking to have PeTA's counsel accept service. In November 2015, Shewmake wrote to the Court that they were specifically not requesting service on the individual defendants (Ms. Carey and Woods). This

was even though their addresses were easily accessible, a matter of public record, and Ms. Woods, a PeTA employee, could have been served at her place of business. In fact, service on Meses Carey and Woods was not initiated by Shewmake and Robb, on behalf of the Zarates, until the summer of 2016 (and they were finally served on June 18 and June 15, 2016, respectively). The Complaint was clearly filed at that time to assist the conspirators in influencing the legislature and as part of the conspiracy to harm PeTA and to drive it out of business.

#### **Conspirators Use Lawsuit for Improper Purposes and Destroy Evidence**

108. The lawsuit was clearly filed as an abuse of process in its entirety and/or in key portions of the lawsuit, which the court dismissed as a matter of law.

109. The conspirators caused the filing of the lawsuit against PeTA not to benefit those plaintiffs (Zarate and his daughter), but to besmirch the defendants therein and to hurt them personally and in their business efforts. Thus, upon filing and without any service upon or notice to the defendants therein, the plaintiffs' attorneys (Shewmake and Robb) disseminated the Complaint to the press. This was done in cooperation with the conspirators from the VFHS and the Richmond SPCA and to generate maximum public coverage.

110. Filed with the Complaint were grossly outrageous discovery requests to PeTA that had absolutely nothing to do with the lawsuit, but were the true purpose for filing the lawsuit. Thus, it was requested that PeTA disclose, *inter alia*, every contributor and the amount of contribution (from all over the world) for the prior five years; every veterinarian in Virginia who provided services to or on behalf of PeTA for the prior ten years; every employee of PeTA for the prior ten years (which would include people from offices all over the United States who were working on issues that could not remotely pertain to the case); the identity of every animal PeTA had treated for the prior ten years (which would include tens of thousands of spay/neuter animals

and innumerable animals which had nothing to do with the shelter or CAP program in Norfolk); etc. The fraudulent allegations in the Complaint were fabricated and composed only to suggest some basis for the outrageous and irrelevant discovery requests. Not serving the individual defendants for many months also demonstrates that the suit was filed solely and unequivocally for the discovery requests (filed only as to PeTA) and only for the benefit of the conspirators, as the information could not benefit the named plaintiffs.

111. Indeed, in mid-January 2016, conspirator Starr made clear to other conspirators and VFHS Board members that the purpose of the lawsuit was to gain discovery and information from PeTA. She had publicly stated this previously in the press. Indeed, the lawsuit was not filed for over a year from when the event occurred, and was filed just prior to the 2016 legislative session in order to use it as a vehicle to influence the legislature.

112. Having sought grossly irrelevant discovery from PeTA as to its internal operations that had nothing to do with the claims in the lawsuit, the conspirators then conspired to conceal from the court information that was highly germane to those claims. Although the plaintiffs likely were not entitled to emotional damages as a matter of law, they still were claimed in the lawsuit. Notably, the conspirators knew that Zarate had expressed fear and distress over exposure of his undocumented status and that of his family and their being deported.

113. Most poignantly, the conspirators oversaw the destruction and spoliation of key evidence in the matter. The organizational conspirators conspired to conceal from VDACS and others key portions of the video footage that would show the dog was running at large immediately before being picked up. The conspirators had kept that information hidden from the Accomack County Sheriff's Office. Similarly, the LeClairRyan lawyers produced small, select portions of the footage in violation of the Court's order and their legal obligations, purposely omitting the most

germane sections where the dog was running at large. The lawyers and the other conspirators purposely did not retain the original footage from the security camera. Instead, they allowed it to be recorded over so the uncopied sections -- which documented the dog running at large -- were erased and destroyed.

114. By late January, 2016, Meinzer was further proposing to the conspirators that PeTA donors be advised of a different lawsuit against PeTA that had been filed in Norfolk (a pure, First Amendment lawsuit that was voluntarily dismissed by the plaintiff without litigation) and how much PeTA must be spending on lawyers and lobbyists. Meinzer's proposal had nothing to do with any valid legal purpose either by Meinzer, the other conspirators, or the VFHS. The sole purpose of Meinzer's proposal was to maliciously harm PeTA through false representations. These actions were consistent with the outrageous and irrelevant discovery requests filed with the Zarate lawsuit *for the names of all PeTA donors and the amounts of their donations for the prior five years, etc.*

115. During the Spring of 2016, Starr, on behalf of the conspirators, closely worked with Shewmake and Robb to manage the Zarate lawsuit. During the rest of 2016, Starr stayed in touch with Shewmake and Robb and continued to seek discovery in the Zarate lawsuit that she and the other conspirators could use to attack PeTA. This discovery was irrelevant to Zarate's claims but highly relevant to the conspirators' efforts to force PeTA to shut down its operations in Virginia, which was the purpose of filing the lawsuit. Jean Linman, a member of the VFHS Board and another conspirator, was deeply involved in monitoring the lawsuit and informing the other conspirators.

116. During this same period, Winograd stayed in touch with the other conspirators and cooperated in the conspiracy.

117. Throughout 2016 and 2017 the LeClairRyan lawyers, Shewmake and Robb, continued to conceal information, including Zarate's immigration status and the destruction of vital evidence (including the video) from the Court and defendants. They instructed third parties not to produce documents that were under subpoena. Despite the fact that the Court dismissed Zarate's major claims and there was overwhelming evidence as to the fraudulent nature of the allegations in the lawsuit, Shewmake and Robb refused to amend the lawsuit even though the Court provided them the opportunity to do so.

**Lawsuit Is Resolved With Zarate's Acknowledgment of an Unfortunate Mistake, But the Conspiracy Against PeTA Continues**

118. Because of the fraudulent allegations and fraudulent discovery demands, PeTA expended thousands of dollars in costs, and hundreds of thousands of dollars in legal fees that would otherwise be used to help animals. In light of these outrageous expenditures, the lawsuit was settled for \$49,000 following mediation in August, 2017. This was less than 1/16,000 of the amount originally sought in the lawsuit and a substantial portion was for out-of-pocket costs. Most poignantly, in settling, Zarate admitted and acknowledged what he knew and what was apparent all along: contrary to the allegations in the Complaint, the taking and subsequent euthanasia of the dog was an unfortunate mistake by PeTA and the individuals involved and that they bore no ill-will toward the Zarate family. He stated:

**"Mr. Zarate acknowledges that this was an unfortunate mistake by PEТА and the individuals involved, with no ill-will toward the Zarate family."**

This directly contradicts the allegations and very gravamen of the Complaint.

119. The conspirators' actions seeking to injure PeTA in its business and operations continued through the settlement of the lawsuit in August 2017 and continues to date. None of the

conspirators have withdrawn from the conspiracy or in any way sought to terminate the conspiracy.

**CAUSES OF ACTION**

**COUNT I Conspiracy to Harm in Trade, Business or Profession  
(Va. Code Ann. § 18.2-499 and 18.2-500)**

120. PeTA realleges and reasserts paragraphs 1 through 119 above.

121. The defendants, Heidi Meinzer, William Gornaa, Edward Armstrong, and Juliana Armstrong, in conjunction with the other conspirators named above, acted in concert, agreed, associated, mutually undertook or combined together to intentionally, purposefully, and without lawful justification injure PeTA in its business and endeavors. In doing so, the defendants and their co-conspirators, *inter alia*, knowingly or with reckless disregard for the truth made false complaints to law enforcement authorities, improperly sought to have criminal charges brought against two individuals assisting PeTA in its activities at the Dreamland 2 trailer park, knowingly or with reckless disregard for the truth made numerous false and defamatory statements concerning PeTA to members of the Virginia legislature, state administrative agencies, other animal welfare groups, and the public in general, and engineered the filing of a bogus lawsuit against PeTA, which contained false and fraudulent allegations.

122. As a proximate consequence of defendants' acts, PeTA sustained substantial compensatory damages, including attorney fees incurred in defending against the conspirators' wrongful actions, for which PeTA is entitled to recover.

WHEREFORE, PeTA asks for joint and several judgment against the defendants for \$1,000,000 in compensatory damages trebled, plus costs and attorney fees (pursuant to Va. Code

Ann. § 18.2-500), as well as injunctive relief to restrain the defendants from continuing the acts complained of, and any other relief the Court deems fit and proper.

### **COUNT II Common Law Conspiracy**

123. PeTA realleges and reasserts paragraphs 1 through 122 above.

124. The defendants, Heidi Meinzer, William Gomas, Edward Armstrong, and Julliana Armstrong, in conjunction with the other conspirators named above, acted in concert, agreed, associated, mutually undertook or combined together to intentionally, purposefully, and without lawful justification injure PeTA in its business and endeavors. In doing so, the Defendants and their co-conspirators, *inter alia*, knowingly or with reckless disregard for the truth made false complaints to law enforcement authorities, improperly sought to have criminal charges brought against two individuals assisting PeTA in its activities at the Dreamland 2 trailer park, knowingly or with reckless disregard for the truth made numerous false and defamatory statements concerning PeTA to members of the Virginia legislature, state administrative agencies, other animal welfare groups, and the public in general, and engineered the filing of a bogus lawsuit against PeTA, which contained false and fraudulent allegations.

125. As a proximate consequence of defendants' acts, PeTA sustained substantial compensatory damages, including attorney fees incurred in defending against the conspirators' wrongful actions, for which PeTA is entitled to recover.

WHEREFORE, PeTA asks for joint and several judgment against the defendants for \$1,000,000 in compensatory damages plus costs, \$350,000 in punitive damages, and any other relief the Court deems fit and proper.

### **COUNT III Conspiracy to Abuse Process**

126. PeTA realleges and reasserts paragraphs 1 through 125 above.

127. The defendants, Heidi Meinzer, William Gornaa, Edward Armstrong, and Julliana Armstrong, in conjunction with the other conspirators named above, acted in concert, agreed, associated, mutually undertook or combined together to intentionally, purposefully, and without lawful justification to injure PeTA through the pursuit of a false and fraudulent lawsuit. In doing so, the conspirators abused the regularly issued process of the court by having issued and serving upon PeTA a judicial summons requiring PeTA to appear before the court and answer the Complaint filed by conspirators, Shewmakc and Robb, on behalf of Zarate.

128. The Summons and Complaint were not served for the purpose of vindicating any legitimate rights of Zarate or of compensating him for any true loss that he may have sustained. Rather, the Summons issued by the court and served upon PeTA was secured for the improper ulterior purpose of engendering public opprobrium against PeTA and for obtaining non-public information as to PeTA's internal operations and to use that information to harm PeTA and to shut down PeTA's operation of its animal shelter.

129. As a proximate consequence of defendants' acts, PeTA sustained substantial compensatory damages, including attorney fees incurred in defending against the conspirators' wrongful actions, for which PeTA is entitled to recover.

WHEREFORE, PeTA asks for joint and several judgment against the defendants for \$1,000,000 in compensatory damages plus costs, \$350,000 in punitive damages, and any other relief the Court deems fit and proper.

### **COUNT IV – Conspiracy to Defame**

130. PeTA realleges and reasserts paragraphs 1 through 129 above.

131. The defendants, Heidi Meinzer, William Gornaa, Edward Armstrong, and Julliana Armstrong, in conjunction with the other conspirators named above, acted in concert, agreed, associated, mutually undertook or combined together to intentionally, purposefully, and without lawful justification to injure PeTA.

132. Numerous of the co-conspirators knew that statements they made about PeTA were false or were made with reckless and/or willful disregard as to the falsity of the statements.

133. The false statements were disseminated to the public and were defamatory per se in that they imputed to PeTA the commission of criminal offenses, imputed that PeTA was not fit to operate an animal shelter, and/or prejudiced PeTA in its charitable and educational activities as a humane society and in its operation of an animal shelter licensed by the Commonwealth of Virginia.

134. As a proximate consequence of defendants' acts, PeTA has sustained substantial compensatory damages, including attorney fees incurred in defending against the conspirators' wrongful actions, for which PeTA is entitled to recover.

WHEREFORE, PeTA asks for joint and several judgment against the defendants for \$1,000,000 in compensatory damages plus costs, \$350,000 in punitive damages, and any other relief the Court deems fit and proper.

#### **COUNT V – Punitive Damages**

135. PeTA realleges and reasserts paragraphs 1 through 134 above.

136. The actions of the defendants and their co-conspirators in the conspiracy were done willfully, wantonly, and maliciously and with reckless disregard for the truth or the rights of the plaintiff.

WHEREFORE, PeTA seeks \$350,000.00 in punitive damages against the named defendants, jointly and severally.

PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS, INC.

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