

EXHIBIT 1

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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF ARIZONA**

12 IN DEFENSE OF ANIMALS, a non-profit
13 organization; the ANIMAL WELFARE
14 INSTITUTE, a non-profit organization; and
15 the INTERNATIONAL SOCIETY FOR THE
16 PROTECTION OF MUSTANGS and
17 BURROS, a non-profit organization;
18 PATRICIA HAIGHT, an individual;
19 RICHARD POTTS, an individual,

20 Plaintiffs,

21 vs.

22 UNITED STATES GOVERNMENT,
23 DEPARTMENT OF AGRICULTURE, ANN
24 M. VENEMAN as acting UNITED STATES,
25 SECRETARY OF AGRICULTURE;
26 UNITED STATES FOREST SERVICE;
27 ELAINE J. ZIEROTH, as the acting UNITED
28 STATES FOREST SUPERVISOR,

Defendants.

Case No. CV-05-2754-PCT-FJM

**VERIFIED COMPLAINT
SEEKING A TEMPORARY
RESTRAINING ORDER,
PRELIMINARY INJUNCTION, and
WRIT of MANDAMUS**

(Jury Trial Demanded)

Plaintiffs, In Defense of Animals, a non-profit organization, the Animal Welfare Institute, a non-profit organization, the International Society for the Protection of Mustangs and Burros, a non-profit organization, Dr. Patricia Haight, and Richard Potts (collectively "Plaintiffs), hereby allege as follows:

NATURE OF THIS ACTION

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2 1. This is an action for declaratory and injunctive relief, as well as seeking
3 redress for violation of several federal statutes.

4 2. This action arises out of the United States Forest Service’s decision to
5 round-up and remove approximately 300 to 400 “feral” or wild horses from the Apache-
6 Sitgreaves National Forests, including a designated protected horse area or sanctuary
7 known as the Heber Wild Horse Territory. The Forest Service has ordered that all horses
8 in its forests be rounded-up because they are allegedly “unauthorized livestock” or
9 “trespass animals.” Thereafter, the horses, per Forest Service order, will be impounded
10 and transported to a livestock auction house near Holbrook, Arizona. Upon information
11 and belief, the majority of these horses will be auctioned and purchased for slaughter and
12 sold for their meat.

JURISDICTION AND VENUE

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14 3. Jurisdiction is proper in this action pursuant to 28 U.S.C. Section 1331
15 (federal question), 28 U.S.C. Section 1361 (mandamus), the Declaratory Judgment Act
16 (28 U.S.C. Sections 2201, 2202), the Administrative Procedure Act (5 U.S.C. Section
17 701, et seq.)(“APA”), and the National Environmental Policy Act (42 U.S.C. Section
18 4321, et seq.)(“NEPA”).

19 4. Venue is appropriate in this Court pursuant to 28 U.S.C. Sections 1391(b)
20 and (e).

21 5. The amount in controversy exceeds the jurisdictional requirements of this
22 court and is believed to be in excess of \$100,000.00, the estimated minimum cost for the
23 rounding-up and removal of the wild horses, according to U.S. Forest Service records.

THE PARTIES

24
25 6. Plaintiff, In Defense of Animals (“IDA”), is a non-profit organization
26 formed for the purpose of promoting animal welfare and protection, including the
27 protection of wild horses. IDA is incorporated in the state of California and has a local
28 office at 2121 South Mill Avenue, Suite 107C, Tempe, Arizona. The IDA has

1 approximately 80,000 members worldwide and of that amount, 1600 members residing in
2 the state of Arizona. IDA brings this action on its own behalf and on behalf of all of its
3 members.

4 7. Plaintiff, the Animal Welfare Institute (“AWI”), is a non-profit organization
5 formed for the purpose of promoting animal welfare and protection, including the
6 protection of wild horses. Plaintiff, AWI, is incorporated in the state of Delaware. AWI
7 has approximately 20,000 constituents throughout the United States and of that amount,
8 242 constituents are in Arizona. AWI brings this action on its behalf and on behalf of all
9 of its members.

10 8. Plaintiff, the International Society for the Protection of Mustangs and
11 Burros (“ISPMB”), is a non-profit organization formed for the purpose of promoting
12 animal welfare and protection, including the protection of wild horses. Plaintiff, ISPMB,
13 is the oldest wild horse and burro organization in the U.S. Along with its first president,
14 Wild Horse Annie, ISPMB was instrumental in securing and implementing the 1971
15 Wild Horse and Burro Act, at issue in this litigation. ISPMB was headquartered in
16 Arizona from approximately 1993 until the year 2000 when it re-located its headquarters
17 to Lantry, South Dakota. ISPMB is incorporated in the state of California and is an
18 affected and interested party in the State of Arizona.

19 9. Plaintiff, Patricia Haight, Ph.D., is the Southwest Regional Director for
20 IDA and resides in Phoenix, Arizona. She is a concerned citizen who enjoys viewing
21 these wild horses in their natural habitat.

22 10. Plaintiff, Richard Potts, is also concerned citizen who enjoys viewing the
23 wild horses in their natural habitat and has done so for many years in the area of
24 Heber/Overgaard, Arizona. He is currently a resident of Heber/Overgaard, Arizona.

25 11. Defendant, the U.S. Department of Agriculture, is a branch of the United
26 States government which has been charged with the responsibility of overseeing the
27 protection and management of wild free-roaming horses.

1 12. Defendant, Ann M. Veneman, is named only in her capacity as the current
2 Secretary of Agriculture, United States Government.

3 13. Defendant, U.S. Forest Service, is a governmental agency of the United
4 States and is under the direction and control of the Secretary of Agriculture.

5 14. Defendant, Elaine Zieroth, is named only in her capacity as the acting U.S.
6 Forest Supervisor for the Apache-Sitgreaves Forests. Her business office is located in
7 Springerville, Arizona.

8 **GENERAL ALLEGATIONS**

9 15. Sometime prior to July 19, 2005, the U.S. Forest Service, arbitrarily and
10 without adequate investigation, determined that approximately 300 to 400 horses living
11 and grazing in the Apache-Sitgreaves National Forests located near Heber/Overgaard,
12 Arizona, were “trespass” or stray horses and that all must be removed from the forest.
13 The U.S. Forest Service summarily concluded that the horses migrated from the
14 reservation borders of the White Mountain Apache Indians to avoid the Rodeo-Chediski
15 fires in 2002. The fires in question took place approximately three years ago.

16 16. The U.S. Forest Service, upon information and belief, has not conducted a
17 census, inventory, or any other type of survey to determine how many of these
18 approximate 300 to 400 horses are branded or unbranded. Nor has the U.S. Forest
19 Service, upon information and belief, made any attempt to determine if any of these 300
20 to 400 horses are “wild free-roaming” horses and thus entitled to protection under the
21 Wild Horses and Burros Act of 1971.

22 17. The majority, if not all, of these horses are residing in the Apache-
23 Sitgreaves National Forests, a portion of which has been designated as the “Heber Wild
24 Horse Territory.” A copy of a map indicating the boundaries of this protected territory is
25 attached at Exhibit A and incorporated herein by reference.

26 18. The U.S. Forest Service has an obligation to manage and protect wild
27 horses residing on any public lands such as the Apache-Sitgreaves National Forests and
28 especially within the Heber Wild Horse Territory.

1 19. The U.S. Forest Service has taken the position that all 300 to 400 of these
2 horses residing in the public lands of the Apache-Sitgreaves National Forest are “stray,
3 domestic horses and are not considered wild.” See United States Department of
4 Agriculture, Forest Service, News Release dated August 31, 2005 entitled “Unauthorized
5 Horses to be Removed from the National Forest,” a copy of which is attached at Exhibit
6 B, and incorporated herein by reference.

7 20. Plaintiffs, IDA, AWI, and ISPMB, have contacted the Defendants U.S.
8 Forest Service and Secretary of Agriculture, and requested that it reconsider its decision
9 to capture and remove these horses. The Defendants have refused. See Letter from
10 Elaine Zieroth dated September 7, 2005, copy attached at Exhibit C and incorporated
11 herein by reference.

12 21. On or about July 19, 2005, the U.S. Forest Service issued a Solicitation for
13 Bid Number AG-8173-S-05-0004, entitled “Trespass Horse Capture and Transport.” A
14 copy of this solicitation is attached hereto at Exhibit D and incorporated herein by
15 reference.

16 22. According to the Solicitation for Bid, the horses are to be captured and
17 transported out of the Apache-Sitgreaves National Forest in Navajo and Coconino
18 Counties, Arizona to an auction house near Holbrook, Arizona.

19 23. Upon information and belief, the estimated cost for removal of these horses
20 is between \$400 and \$800 per horse or \$160,000 to \$320,000 (assuming the estimated
21 number of horses is accurate).

22 24. The Solicitation for Bid provides for a round-up and capture of all horses in
23 the Apache-Sitgreaves Forest including those in the Heber Wild Horse Territory.

24 25. The Solicitation for Bid also provides for a round-up of all mares even
25 those mares with foals.

26 26. Upon information and belief, the majority if not all of these foals were born
27 on public lands, in the national forests and are unbranded and unclaimed. As a result, the
28 foals or any horses born on the public lands, would have the protection of the applicable

1 federal laws such as the Wild Free-Roaming Horses and Burros Act of 1971 and its
2 corresponding regulations.

3 27. Plaintiff IDA issued a Freedom of Information Act 5 U.S.C. Section 552
4 (“FOIA”) request upon the U.S. Forest Service seeking information concerning the
5 decision to capture and remove all horses as trespass horses and unauthorized livestock.
6 Little information was provided in response to the FOIA request. No census was
7 produced nor were any inventories produced suggesting that the U.S. Forest Service has
8 done little over the past few decades to manage or take an accounting of the horses.

9 28. What little information was produced in response to the FOIA request
10 showed that the U.S. Forest Service admitted that it did not “manage” the horses and
11 indicated a desire to be rid of the horses in that area.

12 29. Plaintiffs have asked the U.S. Forest Service to withdraw or delay its
13 Solicitation for Bid and to comply with the applicable federal statutes. Defendants have
14 refused.

15 **COUNT ONE**

16 **(VIOLATION OF WILD HORSES AND BURROS ACT OF 1971)**

17 30. The above paragraphs, numbered 1 through 29, are incorporated herein by
18 reference.

19 31. The preamble and statement of policy for the Wild Free-Roaming Horses
20 and Burros Act of 1971, 16 U.S.C. Section 1331, *et seq.*, states:

21 Congress finds and declares that wild free-roaming horses
22 and burros are living symbols of the historic and pioneer
23 spirit of the West; that they contribute to the diversity of life
24 forms within the Nation and enrich the lives of the American
25 people; and that these horses and burros are fast disappearing
26 from the American scene. It is the policy of Congress that
27 wild free-roaming horses and burros shall be protected from
28 capture, branding, harassment, or death, and to accomplish
this they are to be considered in the area where presently
found, as an integral part of the natural system of the public
lands.

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2 32. Under the 1971 Act, the Secretary of Agriculture is “directed to protect and
3 manage wild free-roaming horses as components of the public lands....” 16 U.S.C.
4 Section 1333(a).

5 33. The term “wild free-roaming horses and burros” is specifically defined
6 under the 1971 Act to mean “all unbranded and unclaimed horses and burros on public
7 lands of the United States.” (Emphasis added.) 16 U.S.C. Section 1333(a).

8 34. The 1971 Act also states that the Secretary “shall manage wild free-
9 roaming horses and burros in a manner that is designated to achieve and maintain a
10 thriving natural ecological balance on the public lands.” 16 U.S.C. Section 1333(a). The
11 Secretary “shall consider the recommendations of qualified scientists in the field of
12 biology and ecology, some of whom shall be independent of both Federal and State
13 agencies and may include members of the Advisory Board established in section 1337 of
14 this title.” 16 U.S.C. Section 1333(a).

15 35. Section 1337 of the Act “directs” the Secretary of Agriculture “to appoint a
16 joint advisory board of not more than nine members to advise them on any matter relating
17 to wild free-roaming horses and burros and their management and protection.” Upon
18 information and belief, no such advisory board has ever been appointed to assist with the
19 wild horses in the Apache-Sitgreaves National Forests.

20 36. The 1971 Act further provides that the Secretary “shall maintain a current
21 inventory of wild free-roaming horses and burros on given areas of the public lands.”
22 Section 1333(b).

23 37. The Code of Federal Register (“CFR”) Section 222.23 entitled “Removal of
24 Other Horses and Burros,” defines the conditions for treating certain horses as
25 “unauthorized livestock” which could then be impounded and properly disposed. Section
26 222.23 provides special protection for horses that do not fall initially within the
27 protection of the 1971 Act, if they are subsequently introduced into a protected territory
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1 “by accident, negligence or willful disregard of private ownership” and which become
2 intermingled with wild free-roaming horses.

3 38. Only if these newly introduced horses do not intermingle may they be
4 considered “unauthorized livestock.” Upon information and belief, to the extent there are
5 any domestic horses now living within the wild herds, they have intermingled and under
6 the 1971 Act are entitled to protection as well. Similarly any newly born foals into the
7 wild would be entitled to the protection of the 1971 Act.

8 39. CFR Section 222.25 of the regulations provides protection for the wild free-
9 roaming horses even if they were to move or migrate off of protected territories onto
10 lands of other ownership or jurisdiction.

11 40. Section 1338a of the 1971 Act provides that while the Secretary may use or
12 contract for the use of motor vehicles for the purpose of transporting captured animals,
13 such use can only be undertaken after a public hearing, among other things. Upon
14 information and belief, no public hearing was held prior to the decision to capture and
15 remove these horses and the Solicitation for Bid (which requires the use of motorized
16 vehicles). See Exhibit D (Solicitation for Bid at § C.1.4.(b)).

17 41. The Defendants, including the U.S. Forest Service, have made an
18 uninformed and unilateral decision to remove all horses from the Apache-Sitgreaves
19 National Forests as “strays” or “unauthorized livestock.” This decision is unsupported by
20 the facts and was made with little to no investigation or inventory of the horses. In so
21 doing, the Defendants have violated the Wild Horses and Burros Act of 1971, including
22 but not limited to:

23 (a) making the decision to capture and remove all horses without first
24 conducting an inventory or accounting of the horses to determine their status as wild or
25 domestic trespass, branded versus unbranded;

26 (b) making the assumption, without reliable data or investigation to
27 support it, such as input from scientists and biologists, that none of the horses in the
28

1 Apache-Sitgreaves National Forests and surrounding area are wild free-roaming horses or
2 offspring of those horses;

3 (c) failing to appoint or consult a joint advisory board concerning this
4 decision to remove all horses;

5 (d) attempting to remove wild free-roaming horses from the Heber Wild
6 Horse Territory and the Apache-Sitgreaves Forests, including the removal of foals who
7 have been born there;

8 (e) failing to manage the wild horses in the area;

9 (f) failing to conduct an inventory or census of the number, types, age,
10 and condition of the wild free-roaming horses in the Apache-Sitgreaves Forests including
11 the Heber Wild Horse Territory;

12 (g) failing to hold a public hearing for comment on the decision to use
13 motor vehicles in the capture and transport of these horses;

14 (h) failing to make an effort to segregate any wild horses from domestic
15 horses before ordering removal of all horses from the Apache-Sitgreaves National Forests
16 including the Heber Wild Horse Territory.

17 **COUNT TWO**
18 **(VIOLATION OF NEPA)**

19 42. The above paragraphs, numbered 1 through 41, are incorporated herein by
20 reference.

21 43. The U.S. Forest Service and Department of Agriculture must comply with
22 the National Environmental Policy Act of 1969, 42 U.S.C. Section 4321, *et seq.*
23 (“NEPA”) before taking any “major federal action.”

24 44. Specifically, Section 4332 of NEPA provides in pertinent part:

25 (2) [A]ll agencies of the Federal Government shall ***

26 (C) include in every recommendation or report on proposals for
27 legislation and other major Federal actions significantly
28

1 affecting the quality of the human environment, a detailed
2 statement by the responsible official on –

- 3 (i) the environmental impact of the proposed action,
4 (ii) any adverse environmental effects which cannot be
5 avoided should the proposal be implemented,
6 (iii) alternatives to the proposed action,
7 (iv) the relationship between local short-term uses of man's
8 environment and the maintenance and enhancement of
9 long-term productivity, and
10 (v) any irreversible and irretrievable commitments of
11 resources which would be involved in the proposed
12 action should it be implemented.

13 Prior to making any detailed statement, the responsible
14 Federal official shall consult with and obtain the comments of
15 any Federal agency which has jurisdiction by law or special
16 expertise with respect to any environmental impact involved.
17 Copies of such statement and the comments and views of the
18 appropriate Federal, State, and local agencies, which are
19 authorized to develop and enforce environmental standards,
20 shall be made available to the President, the Council on
21 Environmental Quality and to the public as provided by
22 section 552 of Title 5, and shall accompany the proposal
23 through the existing agency review processes.

24 45. The order or decision to capture and remove all 300 to 400 horses from the
25 Apache-Sitgreaves National Forests constitutes a “major federal action” under NEPA.

26 46. As such, NEPA requires that an environmental assessment or impact study
27 be conducted as well as a census to determine the precise nature and number of horses are
28 residing in Apache-Sitgreaves Forests including the Heber Wild Horse Territory.

47. The Defendants must comply with the National Environmental Policy Act
of 1969, 42 U.S.C. Section 4321, *et seq.* (“NEPA”) before taking any major federal
action. The removal of all horses from the Apache-Sitgreaves National Forest is a major
federal action.

1 48. The Defendants have failed to comply with NEPA before making the
2 decision to and attempting to removal of all horses from the Apache-Sitgreaves National
3 Forests.

4
5 **COUNT THREE**
6 **(VIOLATION OF ADMINISTRATIVE PROCEDURES ACT)**

7 49. The above paragraphs, numbered 1 through 48, are incorporated herein by
8 reference.

9 50. The Administrative Procedure Act, 5 U.S.C. Sections 551, et seq. (“APA”)
10 applies to the U.S. Forest Service actions and decisions including its Solicitation for Bid.

11 51. Taking steps to remove all horses from the Apache-Sigreaves National
12 Forests without first conducting a full investigation, study, consultation with scientists
13 and biologists, and without any inventory or management of the horses for decades is
14 “arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law.”

15 52. The Defendants have violated the APA. See 5 U.S.C. Section 706(2)(a).

16
17 **COUNT FOUR**
18 **(DECLARATORY RELIEF)**

19 53. The above paragraphs, numbered 1 through 52, are incorporated herein by
20 reference.

21 54. Under the Declaratory Judgment Act, 28 U.S.C. Section 2201-2201, an
22 actual controversy has arisen between Plaintiffs and Defendants involving the
23 interpretation of certain federal statutes and acts within this Court’s jurisdiction.

24 55. Plaintiffs seek a declaration that the Department of Agriculture and U.S.
25 Forest Service, and their respective agents and acting representatives in office, have an
26 obligation under the Wild Horses and Burros Act of 1971 to manage and care for wild
27 free-roaming horses on federal public lands and that the Defendants have failed to and
28 must comply with those obligations.

1 56. Plaintiffs also seek a declaration that the Department of Agriculture and
2 U.S. Forest Service, and their respective agents and acting representatives in office, have
3 an obligation under NEPA to conduct an environmental assessment and/or impact study
4 before issuing a solicitation for bid to remove all horses from the Apache-Sitgreaves
5 National Forests and that the Defendants have failed to comply with those obligations.

6 57. Plaintiffs also seek a declaration that the Department of Agriculture and
7 U.S. Forest Service, and their respective agents and acting representatives in office, have
8 violated the APA by making an arbitrary and capricious decision to remove all horses
9 from the Apache-Sitgreaves National Forests that the Defendants must take the proper
10 steps to comply with the APA.

11 58. Plaintiffs also seek a declaration that the Department of Agriculture and
12 U.S. Forest Service, and their respective agents and acting representatives in office, must
13 comply with the Wild Horses and Burros Act of 1971, NEPA, and the APA before
14 moving forward with any decision to remove all horses from the Heber Wild Horse
15 Territory and surrounding areas including the Apache-Sitgreaves National Forests.

16 **PRAYER FOR RELIEF**

17 Wherefore, Plaintiffs pray for the following relief:

18 That the Court temporarily and preliminarily restrain Defendants, its officers,
19 agents, servants, employees, and those in active concert or participation with Defendants
20 from:

21 (A) Awarding a bid for the capture and removal of any horses from within the
22 Apache-Sitgreaves National Forest, including the Heber Wild Horse
23 Territory;

24 (B) Rounding up and/or removing any horses from the Apache-Sitgreaves
25 National Forests until Defendants have complied with the requirements of
26 the Wild Horses and Burros Act of 1971, NEPA, and the APA including,
27 but not limited to:
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- (1) Preparing an Environmental Impact Statement to determine the impact of the purposed removal on the human and natural environment;
- (2) Determining the number of wild horses located in the Apache-Sitgreaves National Forest including means such as observation for branding or domestic markings, use of genetic testing and/or other means or study;
- (3) Determining the number of branded horses in the Apache-Sitgreaves National Forest that now may qualify for protection under the Wild Horses and Burros Act through intermingling under 36 CFR Section 222.23; and
- (4) Providing the public with notice of any proposed action with regard to horses within the Apache-Sitgreaves National Forest and allowing for public comment on that proposed action and then take into consideration those comments prior to any future action.

Absent the requested relief, Plaintiffs will suffer immediate and irreparable injury.

Furthermore, pursuant to 28 U.S.C. § 1361, Plaintiffs seek a writ of mandamus compelling Defendants to comply with the requirements of the Wild Horse Act in protecting and managing horses within the Apache-Sitgreaves National Forests, including:

- (A) Conducting an inventory or accounting of the horses located within the Apache-Sitgreaves National Forest to determine their status as wild or domestic trespass, branded versus unbranded. See 16 U.S.C. § 1333(b);
- (B) Presenting reliable data or investigative reports to support the assertion, if supportable, that horses in the Apache-Sitgreaves National Forests and surrounding area are “unauthorized livestock,” as opposed to protected “wild free-roaming horses” or offspring of those horses Id.;

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- (C) Protecting any and all wild free-roaming horses in the Apache-Sitgreaves National Forests, including but not limited to foals born there and/or branded horses that have intermingled with the wild horses from capture, branding, harassment and death. See 16 U.S.C. 1331;
- (D) Managing the wild horses in the Apache-Sitgreaves National Forests and surrounding public lands. See 16 U.S.C. § 1333;
- (E) Conducting an inventory or census of the number, types, age, and condition of the wild free-roaming horses in the Apache-Sitgreaves National Forests and surrounding public lands. See 16 U.S.C. § 1338(a);
- (F) Conducting a scientific and independent study to determine the interaction with and relationship of the horses to other wildlife and foliage in the Apache-Sitgreaves National Forests.

For such other relief as the Court deems just and proper.

JURY TRIAL DEMAND

Plaintiffs hereby demand a trial by jury .

DATED this 9th day of September, 2005.

BRYAN CAVE LLP

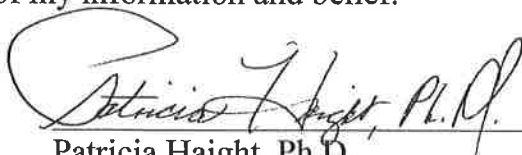
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Attorneys for Plaintiffs

521060/P006716


VERIFICATION

STATE OF ARIZONA)
) ss.
County of Maricopa)

PATRICIA HAIGHT, being first duly sworn upon her oath, deposes and says that
I am the Southwest Regional Director of the organization known as, In Defense of
Animals. In such capacity, I am authorized to make this verification for and on behalf of
plaintiffs. I have read the foregoing Verified Complaint and know the contents thereof to
be true and correct to the best of my information and belief.


Patricia Haight, Ph.D.

Subscribed and sworn to before me this 9th day of September, 2005.


Notary Public

My Commission expires:

May 6, 2008



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