

EXHIBIT B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

ARLENE DEAN,
individually & for all those similarly situated,
Plaintiffs,

23 Civ. _____,

-against-

DECLARATION OF
PAMELA FRASCO

RESCUE DOGS RESCUE SOLDIERS CORP.,
et al.

Defendants.

PAMELA FRASCO certifies as follows:

1. I am over the age of 21, a United State citizen and read and write the English language.
2. I have been in the animal rescue world for some twenty years. In the past four years I started my own rescue and charity called No Paw Left Behind in New Jersey.
3. For about two years, my charity was a New Hope partner with NYCACC. We rescued some 200 dogs from there and placed them in loving homes. NYCACC claims to have 304 New Hope partners, but in fact the majority of them will not work with the NYCACC because it is riddled with drama and harassment. New Hope program director Jessica Vacaro and others there encourage bad actor rescues they befriend to harass other rescues because there is actually a price of thousands of dollars on each dogs' head from pledges by the public that their bad actor rescues profit from by pulling those dogs of value, without any concern for welfare.
4. I can state that with my twenty years of experience that the purpose of a rescue is to pull the dog from a shelter, not use the dog for profit by waiting for people to pledge money on the dog's head. Also, if an organization states they are a sanctuary then they should have meadows, fenced-in areas to play in, be able to run outside, have dog houses to live in, have adequate staff on the premises and use certified trainers and behaviorists to help the dogs when needed.
5. I am familiar with the New Hope partner Rescue Dogs Rescue Soldiers Sanctuary run by Elizabeth Keller in Cherry Valley New York that the NYCACC sends many dogs to that are warehoused and abused there.
6. I saw the August, 2023 pictures from the Otsego Sheriff taken at Keller's "sanctuary" showing dogs warehoused in deplorable conditions that no animal should be in. The Sheriff

report states 63 dogs are there, not licensed and no proof of vaccinations. They are caged in a filthy barn, forced to sleep on cement without beds, toys and not even so much as a blanket.

7. It is unfathomable why the NYCACC sends and continues to send dogs to that horrible place other than it is clear they are doing financial favors to a few rescues Vacaro befriends and has personal relationships with. For instance, in November, 2022, Vacaror terminated my New Hope partner status because Ellen Stewart, Donna Fowler and Donna Darrel, all friends of Vacaro and others at the program, complained that my rescue pulled too many dogs.

8. These greedy persons watch pledges made on social media sites that panic the public into quickly pledging money for a dog advertised to be killed by the NYCACC - sometimes in less than a day. Stewart will make large fake pledges so the public will up their wagers on a dog. As their wagers rise, then Rescue Dogs swoops in to pull the dogs, collects the panic pledges of sometimes thousands per head, and warehouses them in abusive conditions while Keller, Stewart and Fowler continue to prey on the public for more money and dogs while they never adopt out the some 63 dogs they already warehouse. This situation of warehoused dogs makes clear the NYCACC is not operating for the dogs' welfare but solely to support malicious profit making motives of its friends no matter what abuse the dogs will suffer.

9. Another example of the New Hope program and its director Vacaro's malicious operation is proven by the fact that I never published that my relationship was terminated by Vacaro; yet, Donna Darrell of Pound Hounds obtained that private information from Vacaro and published it on social media as Vacaro supports sullyng the good reputation of rescues so her friends Keller, Stewart and Darrel can profit off of innocent dogs who need to be saved and not used as a commodity.

10. The harassment includes Stewart and Keller's operative, Donna Fowler, stalking me on social media and at my home to harass me and my family. Before I realized who Fowler was, she contacted my rescue in about March, 2022 to pull a dog named Curley for her to adopt, but she refused to pay an adoption fee or donate money to the rescue. Despite her refusal to pay, we obliged her request as our mission is to save dogs, but two days later Fowler returned Curley as her true intention was to harass my rescue by causing us to unexpectedly have to pay for the dog's care that Fowler promised to pay for.

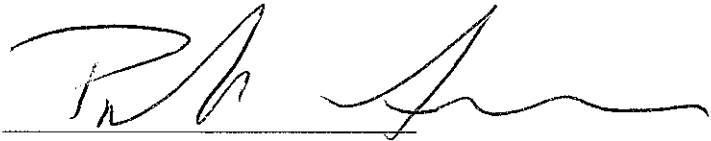
11. Another form of harassment to the rescues involves Stewart's fake pledges for dogs to incite people to panic pledge more money, then Stewart has Rescue Dogs pull the dog, but if another rescue gets the dog first then Stewart refuses to honor her pledge. For example, Stewart

pledged \$500 for a dog named Cammie in about January, 2022. When my rescue pulled Cammie then Stewart refused to honor her \$500 pledge and Stewart, Keller and Fowler viciously attacked my rescue and other rescues on social media with salacious lies because they were angry they did not get the dogs they use as a commodity to line their pockets.

12. The misconduct between the New Hope Program and their friends is actually killing the dogs, not helping them, as they undermine rescues and have turned the program into a selfish and greedy profit-making program at the expense of the dogs they use to barter for money, and this turns other good rescues away from such drama, stalking and salacious lies.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 23, 2023

A handwritten signature in black ink, appearing to read 'P. Frasco', written over a horizontal line.

PAMELA FRASCO