

EXHIBIT G

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

ARLENE DEAN,
on behalf of herself and others similarly situated

Plaintiffs,

-against-

ELIZABETH V. KELLER; RESCUE DOGS RESCUE
SOLDIERS, INC; et al.

Defendants.

23 Civ. ____

DECLARATION OF
ANDREW MINNIG

ANDREW MINNIG certifies as follows:

1. I am over the age of 21, live at 1402 County Hwy 50, Cherry Valley, New York and read and write the English language.
2. I have lived at my property for over 15 years. My next door neighbor kept a pristine show-case home and property for years until it was sold to Elizabeth Keller some 15 years ago. Since Keller took that property at 1414 Co Hwy 50, Cherry Valley New York she has destroyed it to what is now a disheveled house with shudders missing and falling off, the entire surface of the house, front and back, has peeling paint, the carriage house is peeling and rotting, there are broken fences falling down, the courtyard is littered with unused housing structures for animals. The property is chaotic and utterly disheveled in its appearance. Also, on that property is a barn and what was a machine shed, where I believe the distressed dogs are warehoused.
3. Since Keller arrived, she keeps fearsome dogs on that property that incessantly bark and howl in distress in a barn she keeps them in. For the entire some 15 years she's had that property, I have never seen a dog walked or outside for exercise or air, but I always hear what sounds like up to twenty extremely agitated dogs barking every day.
4. Years ago, when I initially complained to Keller about this nuisance she created of loud incessant barking, she said "Oh, no, here it goes again", meaning she has a previous history of complaints for warehousing dogs. Another time, years ago, Keller told me she took in a number of deeply troubled dogs from Utica and the noise will stop once she relocates them as it was a

temporary situation. Other times she told me she purchased collars to make the dogs stop barking, but when I complained to her that they never stopped, she would come up with new excuses that the collar batteries died and she ordered new batteries.

5. Nothing Keller says is true because the dogs never stop barking, and the barking as gone from annoying to chronic.

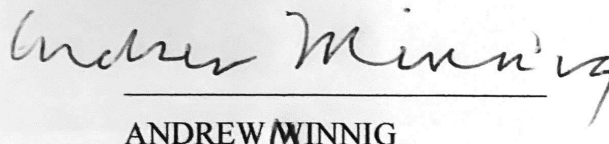
6. At Keller's house at times I saw a young woman with fair complexion and light brown or blonde hair come outside. She would scream outside the barn where the dogs are barking, "Shut up, Shut up!!" It is concerning why no one goes in there to console the distressed dogs and only screams at them from the outside of the barn instead.

7. The only animals I ever saw on that property were three horses, one of which has since disappeared, and I have heard donkeys yelling, but never saw the donkeys outside as well.

8. In no uncertain terms, I can say that Keller is incompetent, chaos prevails with her and she is not providing proper care for those dogs, nor does she care for the quality of life of the dogs or her neighbors.

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

Dated: October 20, 2023


ANDREW WINNIG