



\$100,000+ Judgment Against Co-Op for Failure to Allow Disabled Tenant to Keep Companion Animal

When a pet is more than a pet:
Companion animals and mental disabilities

By Barbara H. Goldman

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For most of us, a companion animal is a valued member of the family. But for some people, having a dog or cat is a critical component of being able to live a normal life. In a number of cases from around the country, tribunals have acknowledged that permitting a pet on rented premises is a necessary “accommodation” to a mental handicap.

A Michigan case, *Michigan Dep't of Civil Rights ex rel Emmick v Royalwood Cooperative Apartments, Inc*, Mich Dep't Civil Rights No. 268485 (2004), involved a long-time co-op owner who took in her deceased mother's dog despite the co-op's “no pets” policy. She made a request to keep the dog, submitting a doctor's letter that it was important in alleviating her anxiety and depression. The co-op denied her request and moved to evict her. She filed a complaint of housing discrimination with the United States Department of Housing and Urban Development, which referred the case to the Michigan Department of Civil Rights. A hearing referee found that the co-op had violated the Michigan Persons With Disabilities Civil Rights Act (“Michigan PWDCRA”) by refusing to make a “reasonable accommodation in rules, policies, practices, or services . . . necessary to afford the person with a disability equal opportunity to use and enjoy residential real property.” MCL 37.1506a(l)(b). The Michigan Civil Rights Commission agreed.

The commission found that the claimant, Christine Emmick, was “disabled” because her long-term anxiety and depression “substantially limited” two “major life activities,” work and sleep. They also held that having the dog was part of her treatment and that it would not be an “undue hardship” on the co-op to permit Emmick to keep the animal. It rejected the co-op's argument that it was only required to “accommodate” a recognized “service animal,” not an ordinary pet.¹ Emmick was awarded \$107,749.63 damages including \$45,000.00 for emotional distress, mental anguish, and humiliation, as well as \$62,749.63 for attorney's fees and costs. The Michigan PWDCRA provides for reasonable attorneys' fees. Although the fees in this case were awarded to the Department of Civil Rights, there is no statutory prohibition on awarding such fees to a private attorney.²

The co-op appealed the decision to the circuit court for Oakland County, where Judge Fred Mester affirmed the Commission's order on August 3, 2004. Although he was “skep-

Chair's Corner

By Jean Ligon

If we didn't love animals, we wouldn't be here, right?

And this is a pretty good place to be. In 2004, the section presented awards to Senator Levin for his support over many years of issues important to the section, and to Ron Kagan, the Director of the Detroit Zoo, for his act of compassion toward the zoo's elephants, Wanda and Winkie, in the face of opposition by the American Zoo Association. Purely out of concern for the health and well being of the elephants, he initiated their move to a sanctuary in a gentler climate where their environment would be more like their natural habitat.

In conjunction with the Michigan Humane Society, the section sponsored a well-received full-day seminar on representing non-profit organizations benefiting animals. In addition, over the past year, it continued to weigh in with support for legislation favorable to animals and in opposition to legislation that exploited them. Notable among these was the mourning dove hunting bill, an issue still very much on the radar screen of the section council.

If you have not been active in the section, consider this your invitation to become so. Though still in its infancy, animal law shows every indication of developing into a discrete area of the law. In recent years, issues involving animals have been brought to the attention of the court with greater frequency in domestic cases, more people are making plans for continued care of their pets in estate plans, and the link between animal cruelty and crimes involving physical abuse to humans has increasingly been acknowledged and accepted.

Some states have begun to grapple with the kind and size of damage awards for the negligence, intentional maiming, or killing of a pet, which means the beginning of movement in that area of the law is likely at hand. But no Michigan decision ruling favorably on the issue of non-economic damages or viewing the loss of an animal as something other than a property loss has yet been rendered. Having said that, there has been the occasional arbitration decision that considered the well being of the animal, not just the strength of the ownership claim, when awarding custody of a pet, and the law's traditional view of animals and animal issues are being more frequently challenged.

It is an exciting time to be involved with animal-related legal issues. The section's March Symposium on animal

law is an excellent way to bring yourself up-to-speed. It will tell you how the courts have ruled in recent cases involving animals and provide you with the informational tools necessary to effectively handle animal issues most likely to arise in your practice. The ALS Symposium on Animal Law will be held at MSU's College of Law at 1 p.m. on March 11, 2005. It will include a comprehensive update on cases and legislation in Michigan involving animals, as well as presentations on assessing and managing civil liability in equine cases and on application of the Consumer Protection Act in cases related to animals. You will be able to go to the Animal Law Section website for more information and to register

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Editor's Note

Welcome to the latest issue of the Animal Law Section's Newsletter. Our goal is to provide a newsletter that members want to read because it contains information about: 1) Cases involving attorney fees and monetary awards, 2) General information about the direction of animal law, and 3) Cases and information of interest to prosecutors. Each newsletter edition may not contain articles meeting all three goals. However, over the course of a year, all goals should be met with publication of several issues.

Many of you may find the Royalwood Cooperative Apartments case write-up in this issue of interest as this Oakland County case involves a judg-

ment of over \$100,000. Additionally, there have been some major grants to law schools related to Animal Law of \$1 million each. Money is starting to impact the area of Animal Law and all work is not pro bono.

We have an aggressive publishing schedule this year with a target of three issues by the end of September 2005. The good news is that we have planned many of the articles for future issues and some are already completed. You can expect the next issue in May 2005.

Please let me know if you have an article to contribute or suggestions about the newsletter. You can email me at donaldgarlit@yahoo.com. 🐾

Donald Garlit

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tical” initially, Judge Mester concluded that the claimant “had a well-documented disability and was able to prove that the dog helps her in coping with that disability.”³ Royalwood did not apply for leave to appeal.

In several cases from other jurisdictions, courts have held that a person with a mental disability must be permitted to keep a companion animal.

Two cases were decided under section 504 of the Federal Rehabilitation Act of 1973, 29 USC 794, which provides that “otherwise qualified handicapped individual[s]” may not be “denied the benefits of” any “program or activity receiving Federal Financial Assistance.” The plaintiff in *Whittier Terrace Associates v Hampshire* 532 NE2d 712, 712-713 (Mass Ct App, 1989), a woman with a psychiatric disability, established that she had “an emotional and psychological dependence” on her cat. The cat was not disruptive to anyone else in the project and the court held that “[a] narrow exception to the rigid application of the no-pet rule, involving no untoward collateral consequences will enable a handicapped person to continue to function successfully on her own.” 532 NE2d 713. In *Majors v Housing Authority of the County of DeKalb Georgia*, 652 F2d 454 (CA5, 1981), the plaintiff alleged that she “suffered from a mental disability which requires the companionship of her dog.” *Id.* at 457. The defendant stipulated to the facts for the purposes of a summary judgment motion. The court held that a waiver of the defendant’s “no pets” policy would be a “reasonable accommodation,” but remanded the case for a determination of whether the plaintiff was handicapped and if she needed the dog.⁴

Janush v Charities Housing Development Corp, 169 FSupp2d 1133 (ND Cal, 2000) involved a claim under the federal Fair Housing Act, 42 USC 3601 et seq. The plaintiff suffered from a “severe mental health disability.” She had two birds

and two cats and submitted evidence that they “lessen[ed] the effects of this disability by providing her with companionship and are necessary to her mental health.” She moved into a federally-subsidized apartment building with the pets and quickly got involved in a dispute over whether she could keep them. The building moved to evict her; she filed suit, but moved out anyway. 42 USC 3604(f)(3)(B) prohibits discrimination in housing against persons with “handicaps,” including “a refusal to make reasonable accommodations in rules [or] policies . . .” The district court rejected the defendant’s argument that it was required to accommodate only “service dogs,” as defined in a California statute, but did not actually rule that the plaintiff should have been permitted to keep the animals. Rather, the court held that the defendant had not shown that the plaintiff’s request was “necessarily unreasonable.”

In California, *Auburn Hills I Homeowners Ass’n v Fair Employment & Housing Comm’n* (In re Elebiari), 18 Cal Rptr 3d 669 (Cal App, 2004), applied the state’s Fair Employment and Housing Act (Cal Gov Code, § 12900 et seq.) to a couple who both had severe depression and other problems. Their condo association denied their request to keep their dog. They sold the condo, but filed a claim with the California Fair Employment and Housing Commission. The commission found in their favor and the California Court of Appeals later affirmed. The court held that the California fair housing statute covered mental disabilities, that the complainants had established they were “disabled within the meaning” of the act and that the dog helped them. *Id.* at 679. The court concluded, “under the right circumstances, allowing a pet despite a no-pets policy may constitute a reasonable accommodation.” 18 Cal Rptr 3d 679. The California Supreme Court denied leave to appeal.

In addition, there have been two administrative law decisions under

the Fair Housing Act, finding that landlords were required to permit companion animals. The complainant in *Secretary of Housing & Urban Development v Dutra* (ex rel Evan), HUDALJ 09-93-1753-8 (1996) suffered from fibromyalgia and associated mental distress. He lived alone, with a cat, whom he described as “like his child.” He engaged in a lengthy dispute with his landlord over the cat, but was eventually permitted to keep the cat “for therapeutic purposes.” An ALJ held that the landlord had violated the fair housing act and awarded the tenant damages for economic losses and emotional distress. In *Secretary of Housing & Urban Development v Riverbay Corp* (ex rel Exelberth), HUDALJ 02-93-0320-1 (1994), the complainant was an elderly woman who was disabled by depression. She owned a terrier. The defendant fined her for keeping the dog, then moved to evict her. She filed a fair housing complaint and produced considerable medical testimony that the dog helped alleviate her depression and related problems. The administrative law judge held that the landlord had violated the act and added, “despite the Respondent’s unsupported assertions that this accommodation will unleash a flood of requests for dog harboring from . . . residents, and the subsequent headaches of sanitation and liability flowing from [its] presumed canine population, I find the requested accommodation reasonable.” *Id.* at 13.

In short, the legal system is gradually coming to appreciate the role that companion animals play in the mental health of disabled individuals. It is important, however, for attorneys to keep several points in mind. First, it makes a difference what law the complainant seeks to take advantage of. For example, the rehabilitation act only applies to federally-subsidized housing; a tenant in an ordinary rental unit would

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not be able to benefit from it. The Fair Housing Act, however, applies to all lessors, as do the Michigan PWDCRA and the Americans with Disabilities Act.⁵ In addition, there have not yet been any cases applying either Michigan or federal law to condominiums.⁶ Finally, a person making a complaint under any of these statutes will have to provide convincing evidence that he or she is “disabled” and that having the pet is genuinely necessary to his or her mental or physical health.

Nonetheless, it is encouraging to see courts beginning to recognize the value of companion animals to people with mental challenges. It is a four-footed step in the right direction. 🐾

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Endnotes

- 1 There are multiple cases, not reviewed here, holding that permitting a “service animal” that assists a handicapped tenant is a required accommodation. 24 CFR 100.204(b) specifically requires lessors to permit “seeing eye” dogs.
- 2 MCL 37.1606(3) provides, “As used in subsection (1), ‘damages’ means damages for injury or loss caused by each violation of this act, including reasonable attorneys’ fees.” As to the other acts referenced in this article, there is no reason to think that, if they permit attorneys’ fees at all, the fees would not apply to private practitioners. If the individual has a right of action (i.e., the statute is not limited to actions brought only by the attorney general or like official), and the statute permits fees as damages, then the individual’s attorney would be entitled to the fee.
- 3 *Woman wins claim she needs dog to fight depression*, Detroit Free Press, Aug. 10, 2004.
- 4 But see *Durkee v Staszak*, 636 NYS2d 880 (NY App Div, 1996), where the New York Court of Appeals held that neither the rehabilitation act nor state law required that a mentally disabled man be provided with emergency housing that would accommodate his dog.
- 5 To date, there have not been any reports of cases applying the ADA in this context.
- 6 *Elebani, supra*, was decided under California law.

The Animal Welfare Act, Medical Research and Non-Human Primates

By Theresamarie Mantese, Christine Pfeiffer,
and Jacquelyn McClinton

Editor’s Note: The Act’s requirement, discussed in this article, to promulgate regulations that promote the psychological well-being of primates, is the subject of a federal lawsuit currently on appeal, Animal Legal Defense Fund, Inc. v Veneman, No. 04-15788 (9th Cir. filed April 23, 2004)

Introduction

As our society moves into more complex areas of medical and scientific research, including stem-cell research, embryonic and genetic testing, and cloning, we are confronted with how to achieve medical advances in an ethical and humane manner. One issue that has been at the forefront for universities and other research centers is the humane treatment of animals in such facilities in accordance with the Federal Animal Welfare Act (the “AWA” or “Act”). Of course, many federal grants and other public funds are also contingent upon compliance with this Act.

Minimal judicial precedent exists interpreting the requirements under the AWA. As a general observation, the statute appears to be intended to balance the competing goals of medical and technological advancements with a recognition and appreciation of life in all forms. Indeed, in our efforts to find cures for incapacitating and fatal diseases, our treatment of non-human species raises complex philosophical questions. The debate over the use of animals in medical research has been rigorously pursued among ethicists, theologians, scientists, and philosophers for years.

This article focuses on a small corner of this complex question. That is, we will explore the obligations imposed on research facilities under the AWA as to non-human primates. The reason for this emphasis is that these animals display many human characteristics, as shown in their ability to socialize with each other, to learn complex skills, and to exhibit psychological illness from isolation and other harmful environments. It is to these animals that many of our most dramatic medical breakthroughs are owed. Yet, as with every human endeavor, parameters must be set on how we achieve these advancements. In the United States, it is our policy makers that provide us with these parameters.

Additionally, we will briefly examine penalties applicable to research facilities for violation(s) of the Act, and how the Act affects research.

The Animal Welfare Act

BACKGROUND OF THE ANIMAL WELFARE ACT

The Animal Welfare Act provides:

The Congress finds that animals and activities which are regulated under this chapter are either in interstate or foreign commerce or substantially affect such commerce or the free flow thereof, and that regulation of animals and activities as provided in this chapter is necessary to prevent and eliminate burdens upon such commerce and to effectively regulate such commerce, in order--

- (1) to insure that animals intended for use in research facilities or for exhibition purposes or for use as pets are provided humane care and treatment;

- (2) to assure the humane treatment of animals during transportation in commerce; and
- (3) to protect the owners of animals from the theft of their animals by preventing the sale or use of animals which have been stolen.

The Congress further finds that it is essential to regulate, as provided in this chapter, the transportation, purchase, sale, housing, care, handling, and treatment of animals by carriers or by persons or organizations engaged in using them for research or experimental purposes or for exhibition purposes or holding them for sale as pets or for any such purpose or use.¹

In 1985, Congress passed the Improved Standards for Laboratory Animals Act, Pub.L. No. 99-198, 99 Stat. 1645, amending the AWA of 1966.² The 1985 amendments directed the Secretary of Agriculture (“Secretary”) to promulgate “standards to govern the humane handling, care, treatment, and transportation of animals by dealers, research facilities, and exhibitors.”³ Among other requirements, the Act specified that the standards must provide for, “minimum requirements . . . for a physical environment adequate to promote the psychological well-being of primates.”⁴

The notice of intent to issue regulations was originally published in the Federal Register in 1986.⁵ The Secretary, however, did not publish the proposed regulations until 1989.⁶ As the District of Columbia Court of Appeals noted in *Animal Legal Defense Fund, Inc v. Glickman*,⁷ the task of drafting regulations to comply with the “promotion of the psychological well-being of primates” requirement, was quite difficult because of primate diversity:

There are over 240 species of non-human primates, ranging from marmosets of South America that are a foot tall and weigh

less than half a pound to gorillas of western Africa standing six feet tall and weighing up to 500 pounds. It proved no simple task to design regulations to promote the psychological well-being of such varied species as they are kept and handled for exhibition and research.⁸

Notably, the Secretary received 10,686 comments on the proposed regulations. Many commentators stated that the proposed standards would interfere with research due to their rigidity and specificity. Commentators further expressed their concerns that the proposed regulations would not allow flexibility and innovations necessary for the optimal care and treatment of animals. In particular, commentators objected to the implementation of engineering standards. Engineering standards refer to specific requirements that a research facility must follow to achieve psychological well-being for primates. In contrast, performance standards provide the research facility with the choice of the means used to achieve the desired result of psychological well-being.⁹

Objections to engineering standards were based on the standards’ anticipated interference with professional judgment, inability to meet ever-changing goals, and lack of scientific justification.¹⁰ The final regulations, which were published in 1991¹¹, contain two separate approaches to achieve the “psychological well-being of primates” requirement. These two approaches are described as engineering standards and performance standards.

Final Regulations under the Animal Welfare Act

Under the Final Regulations to the AWA, there are five guidelines that the Secretary considers engineering standards. First, a research proposal must generally prohibit the use of restraints, subject to certain exceptions as determined by the attending veteri-

narian.¹² Second, primary enclosures must be “enriched” so that primates may exhibit their typical behavior, such as swinging or foraging.¹³ Third, certain types of primates must be given special attention, including infants, young juveniles, individually housed primates, and great apes over 110 pounds, again in accord with “the instructions of the attending veterinarian.”¹⁴ Fourth, facilities must “address the social needs of nonhuman primates . . . in accordance with currently accepted professional standards . . . and as directed by the attending veterinarian,” but they may individually house primates under conditions further specified in the regulations.¹⁵ Finally, minimum cage sizes are set according to the typical weight of different species.¹⁶

To implement these guidelines, facilities must also develop a performance plan, “in accordance with the currently accepted professional standards as cited in appropriate professional journals or reference guides, and as directed by the attending veterinarian.”¹⁷ This plan “must be made available to APHIS [Animal and Plant Health Inspection Service] upon request, and, in the case of research facilities, to officials of any pertinent funding agency.”¹⁸ While there are other criteria, the plan must address social grouping.¹⁹ Social grouping requires an environment enhancement plan containing specific provisions to address the social needs of nonhuman primate species known to exist in social groups in nature.²⁰

Originally in 1989, the Secretary proposed to include a requirement of group housing for primates, stating:

[N]onhuman primates must be grouped in a primary enclosure with compatible members of their species or with other nonhuman primate species, either in pairs, family groups, or other compatible social groupings, whenever possible and consistent with provid-

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ing for the nonhuman primates' health, safety, and well-being, unless social grouping is prohibited by an animal care and use procedure and approved by the facility's Committee.²¹

The Secretary proposed this requirement "based upon scientific evidence and our experience, both of which indicate that nonhuman primates are social beings in nature and require contact with other nonhuman primates for their psychological well-being. . . . Social deprivation is regarded by the scientific community as psychologically debilitating to social animals."²² While the original proposal envisioned a general group-housing requirement, the final regulations do *not* impose such a requirement.

The final regulation provides for exceptions to the social needs provision if the primate is vicious or debilitated, or if it carries contagious diseases, or if its potential companions are not compatible.²³ The Secretary's 1989 proposal was rejected, as it was at odds with comments made on the record. For example, the American Psychological Association noted the wide disparities in social behavior among primates, with some forming large troops of 50 to 100 or more, others living in small groups of 10 to 20, and still others spending their lives in almost solitary isolation or as pairs in the wild.²⁴ The 1989 proposal itself then generated new opposing comments, most notably from the University of Chicago, which pointed out that group housing "can significantly increase the incidence of trauma, the spread of upper respiratory and gastrointestinal diseases and more recently has been responsible for the outbreak of Simian Acquired Immune Deficiency Syndrome."²⁵

Specifically, the final regulations state that group housing would not

be appropriate under the following circumstances: (1) a nonhuman primate exhibits vicious or overly aggressive behavior, or is debilitated because of age or other conditions; (2) a nonhuman primate or group of nonhuman primates has or is suspected of having a contagious disease, as directed by the attending veterinarian; and (3) a nonhuman primate is not compatible with other primates, prevents access to food, water, and shelter by other animals, or is known to be hazardous to the health and well-being of other primates.²⁶

The final regulations also provide that the compatibility of nonhuman primates must be decided according to generally accepted professional practices and actual observations, as directed by the attending veterinarian, to ensure that the animals are compatible.²⁷ Additionally, individually housed nonhuman primates must be able to see and hear nonhuman primates of their own or compatible species, unless the attending veterinarian determines that it would endanger their health, safety, or well-being.²⁸

Penalties Under the Animal Welfare Act

An organization (or individual) conducting a research project involving laboratory animals, which is supported with Special Research Grants Program funds, is required to comply with all applicable provision of the AWA related to the care and treatment of laboratory animals. Sanctions for violation of the Act may be imposed only after consideration of business size, gravity of violations, good faith and history of violations.

If a violation of the statute by a research facility occurs, penalties can be assessed in the form of a civil penalty, cease and desist order, or both. The

purpose of sanctions is to deter the violator as well as potential violators from committing the same or similar violations.²⁹ Corrections are encouraged and can be used in determining what sanctions should be accessed. However, even immediate correction of a violation does not provide a basis for dismissal of the alleged violation.³⁰

Civil Penalties

A research facility that violates any provision of the statute may be assessed a civil penalty of not more than \$1,000 for each such violation as provided in 7 USC § 2149(b). Each violation and each day during which a violation continues shall be a separate offense.³¹ However, a penalty may not be assessed unless the party is given notice and opportunity for a hearing regarding the alleged violation.³² An order of the Secretary assessing a civil penalty is final but can be appealed to the appropriate United States Court of Appeals.³³ If a facility fails to pay the penalty assessed in a final order, the Attorney General is required to institute a civil action to collect the penalty.³⁴ Importantly, ability to pay the civil penalty is not to be considered in determining whether a penalty should be imposed under the Act.³⁵

Civil penalties can be assessed after a showing of a pattern of violations or where numerous violations have occurred. In *In Re Stumbo*³⁶ the court held that a \$4,000 civil penalty was appropriate where the party committed numerous, serious violations of the Act. In this case, the party handled a large number of animals and continued the violations after being advised in writing of violations and given the opportunity to correct them. United States Department of Agriculture administrative law judges have recognized, however, that trivial violations may not warrant the

imposition of a penalty.³⁷ In contrast, a civil penalty of \$200,000, which is the largest civil penalty ever imposed under the Act, was appropriate where there were serious, continuing, and willful violations.³⁸

Cease and Desist Orders

A cease and desist order may be issued under 7 USC § 2149(b) to prevent a continued violation of the Act. However, as is true of civil penalties, the Secretary may not issue a cease and desist order without notice and an opportunity for a hearing regarding the alleged violation.³⁹ The order is final but can be appealed to the appropriate United States Court of Appeals.

A person (or entity) who knowingly fails to obey a cease and desist order shall be assessed a civil penalty of \$500 for each offense.⁴⁰ Each day that the person (or entity) fails to obey the order is deemed a separate offense.⁴¹

How The Act Affects Research

Among animal rights activists, many do not believe that the AWA adequately protects animals used in medical research. However, attempts to challenge the AWA have been unsuccessful since the Fourth Circuit held in *International Primate Protection League v Institute for Behavioral Research, Inc.*,⁴² that the Act does not allow for lawsuits by private individuals. Specifically, the Court concluded: “[t]he statutory design [under the AWA] is . . . inconsistent with the private right of action that plaintiffs assert.”⁴³ Further, “[t]he uniformity and specialization normally thought to accompany regulatory oversight . . . would not inhere in enforcement of the statute through private rights of action.”⁴⁴ Accordingly, among animal activists, there have been strong criticisms of the AWA:

The AWA continues the tradition of recognizing animals as property interests by permitting experimentation on them. In fact, the AWA completely

fails to regulate the actual content of the experimentation performed on animals. . . . Instead of regulating experimentation, the AWA embraces the use of animals in experiments and assumes that it is morally acceptable to use animals in experiments. . . . The AWA yields to the scientific community to determine the suitability of experiments by allowing practices involving animals to remain unrestricted whenever scientists deem that the use is “necessary.”⁴⁵

Similarly, there are those who believe that “although the AWA mandates that research activities be conducted in as humane a manner as possible, the AWA still validates the essential merit and legality of various activities that are beneficial to humans but which, by their very nature, harm animals.”⁴⁶ Advocates of this view, including the Humane Society of the United States, argue that the Act does little to protect animals, particularly as the Act does not protect rats or mice, which comprise 95% of the animals used in research.⁴⁷

In contrast, others feel the AWA goes too far and limits the ability to conduct meaningful research. Some think that the random inspections of research facilities proscribed in the Act are a violation of their constitutional rights. In *Lesser v Espy*,⁴⁸ the petitioner, appealing an order finding him in violation of the Act, argued that inspections without a warrant violated the right to be free from unreasonable searches as guaranteed by the Fourth Amendment of the Constitution.⁴⁹ The court agreed with the Secretary’s argument that, “preserving the element of surprise and the possibility of frequent inspections is necessary in order to detect violators.”⁵⁰ Additionally, the court held that the Act’s inspection program provided a constitutionally adequate substitute for a warrant where

the Act alerted petitioner that there were periodic inspections, and the Act defined the scope, time, and place for inspections.⁵¹

Many researchers and scientists have expressed the view that the Act is not intended to curtail legitimate scientific discovery in the health field area, but to prohibit subjecting animals to inhumane treatment in the pursuit of medical and scientific innovations. Thus, interpretation and application of the AWA should include an appreciation of the fact that we must balance the need to use animals in research to eliminate the tragic loss of human life to disease and injury against the desire to avoid harming other forms of life without purpose or necessity.

Conclusion

The area of animal rights as it relates to scientific and medical research will be the subject of a continuing dialogue among a vast array of competing disciplines involving medicine, science, law, and other humanities. As with all human debate, there is a balancing of social initiatives that drive the course of action. We may have to regroup and refine our initiatives as technological innovations become more prevalent, but we cannot lose sight of our aspiration to respect all forms of life, as part of our ever-emerging society. ♣

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Endnotes

- 1 7 USC § 2131 (1988 & Supp. V. 1993).
- 2 See 7 USC § 2131, *et seq.*
- 3 *Id* § 2143(a)(1).
- 4 *Id* § 2143(a)(1)-(2).

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- 5 51 Fed Reg 7950 (1986).
 6 54 Fed Reg 10897 (1989).
 7 204 F3d 229, 340 US App DC 191 (2000) (court examined the history and language of the Animal Welfare Act (AWA) even though the issue before the court was whether an animal welfare organization had standing to raise procedural injury under the Act).
 8 *Id* at 231.
 9 See 56 Fed Reg 6426, 6427 (1991) (discussing engineering and performance standards generally).
 10 55 Fed Reg 33448 (1990).
 11 56 Fed Reg at 6426 (1991); 9 C.F.R. § 3.81 (2004).
 12 9 CFR § 3.81(d) (2004).
 13 *Id* § 3.81(b).
 14 *Id* § 3.81(c).
 15 *Id* § 3.81(a).
 16 9 CFR § 3.80(b)(2)(i) (2004).
 17 9 CFR § 3.81 (2004).
 18 *Id*.
 19 *Id* § 3.81(a).
 20 *Id*.
 21 54 Fed Reg 10897, 10917 (1989).
 22 *Id*.
 23 9 CFR § 3.81(a)(1)-(3).
 24 *Glickman, supra* at 234.
- 25 *Id*.
 26 55 Fed Reg at 33491-33492 (1990).
 27 55 Fed Reg at 33491 (1990).
 28 55 Fed Reg at 33491-33492 (1990).
 29 *In re David M. Zimmerman*, 56 Agric Dec 433, 1997 WL 327152, *22 (1997).
 30 *In re Volpe Vito, Inc., d/b/a Four Bears Water Park and Recreation Area*, 56 Agric Dec 166, 1997 WL 15684, *53 (1997).
 31 7 USC § 2149(b).
 32 *Id*.
 33 *Id*.
 34 *Id*.
 35 *In re Jerome A. Johnson, et al*, 51 Agric Dec 209, 1992 WL 130452, *7 (1992).
 36 43 Ag Dec 1079, 1984 WL 54981, *15-16 (1984).
 37 *In Re Zartman*, 44 Agric Dec 174, 1985 WL 62917, *11-12 (1985) (the U.S.D.A. Judicial Officer upheld the administrative law judge's dismissal of the complaint against respondent, holding: "the violations detected on both dates were of a trivial nature, not posing any serious threat to the well-being of the animals. Respondent has been in animal auction business for about 32 years, and, except for the trivial violations involved here, respondent had a long, unblemished record of compliance with federal and state requirements applicable to his animal auction").
 38 *In re Julian J. Toney and Anita L. Toney*, 54 Agric Dec 922, 1995 WL 560811, *24-25 (1995).
 39 *Id*.
 40 7 USC § 2149(b).
 41 *Id*.
 42 799 F2d 934 (4th Cir 1986).
 43 *Id* at 939.
 44 *Id* at 940.
 45 23 Seton Hall Legis. J. 443, 463-464 (1999).
 46 22 B.C. Env'tl. Aff. L. Rev. 747, 765-766 (1995).
 47 The Humane Society of the United States, *Passage of Farm Bill Denies Protection to Birds, Mice and Rats* (visited July 22, 2004), <<http://www.hsu.org/acc/14121>>.
 48 34 F3d 1301 (7th Cir 1994).
 49 *Id* at 1305.
 50 *Id* at 1308.
 51 *Id* at 1308-1309.



What IS Animal Law?

By Anna Sloan

Editor's Note: This article was previously published in February 2004 in Res Ipsa Loquitur, the student newspaper of MSU College of Law and has been updated for this newsletter.

When people ask me why I came to law school, I take a deep breath and answer that I want to practice animal law. Generally, this response is followed by a confused look and the question of what animal law is.

Animal law is so many things, and it affects your life in many more ways than you probably expect. Animal law

essentially encompasses everything that may possibly affect animals, including companion animals, wildlife, animals used for food, and animals used for research purposes. The body of law that encompasses animal law includes civil and criminal case law as well as a wide array of state and federal statutes and regulations.

Despite the pervasive reach of animal issues, this area of law is unfortunately severely inadequate. In their present state, many of these laws fail to protect animals, often due to a lack of enforcement or on account of weak-

nesses and loopholes inherent in many of the laws. And in failing to protect animals, they also fail to adequately protect humans.

Evolving social and political considerations are gradually addressing these inadequacies. For example, on its face, treating acts of cruelty to animals as minor offenses may not seem unreasonable, and until recently this view predominated judicial and legislative thought. However the idea has become progressively more unreasonable as correlations between violence toward animals and subsequent violence toward humans are examined. If cruelty to animals carried a stiffer penalty, harm to humans could potentially be reduced. Similarly, though the humane treatment of farm animals may not be an ongoing concern for much of the public, many people have recently changed their opinion upon discovering that federal laws allow downed animals, that is those animals too ill to walk to slaughter under their own power, to nonetheless be slaughtered for human consumption. Recent outbreaks of Mad Cow disease have been specifically attributed to the ongoing permissibility of these practices; a recent outbreak nearly debilitated the U.S. beef market. It appears increasingly clear that animal law is a field of law with diverse implications for humans, human institutions, and of course the animals themselves.

Animal law is a growing field. Most students at MSU College of Law probably don't realize how lucky they are that they have the opportunity to take classes like Animal Law and Wildlife Law and to participate in the newly formed *Journal of Animal Law*. When I was researching schools that offer animal law classes several years ago, I learned that there were only about 20

schools in the country that even offer an animal law class. At the time that I applied, the only school that would have provided more extensive opportunities for the study of animal law than MSU College of Law was Northwestern School of Law of Lewis and Clark College. Lewis and Clark is the home of the National Center for Animal Law and publishes the *Animal Law Review*.

Since the time that I applied to law school, the field of animal law has continued to increase in academic and public prominence. Bob Barker, the host of *The Price is Right* recently donated \$500,000 to Harvard Law School so that animal law could be offered. With these funds, in 2003 Harvard Law School hosted a symposium addressing "The Evolving Legal Status of Chimpanzees." The symposium featured legal scholars from across the country as well as internationally known primatologists. In February 2004, the National Center for Animal Law hosted at Harvard the first National Animal Advocacy Competitions, which featured a moot court as well as a closing argument competition. Harvard will again be hosting the event in February 2005. Other schools that have received similar grants from Barker for the study of animal rights law include Duke University, Stanford University, Columbia University, and University of California at Los Angeles. In addition, in November 2004, Yale University hosted the Future of Animal Law Conference, which had over 200 attorneys and law students in attendance.

With an increasing number of prestigious competitions and scholarly lectures, more law schools and State Bars across the country are recognizing animal law as a growing field. In the past three years, the number of

law schools offering animal law classes has doubled with a current total of 40 schools. In addition, 55 schools have Student Animal Legal Defense Fund chapters and seven more are in the process of formation. The Bars of 10 states currently have animal law sections or committees, including Michigan, which was the first in the nation. Two more states are in the process of forming sections. In addition, there are eight regional animal law sections or committees, including Washington, D.C., Chicago, and New York City.

Animal law is an amalgamation of nearly all other areas of law. Animal law is also a field that implicates a massive body of political, economic, social, psychological, ecological, and scientific knowledge. It is a truly interdisciplinary field of legal practice, and it is a field of law that is growing in influence, significance, and esteem. Whether in the form of a private sector animal law practice or governmental employment with one of the many departments and agencies that oversee animal matters, careers in animal law can take many forms. Including animal law education in your legal education can also enhance other areas of practice seemingly unrelated to animals. Few fields of law draw upon such a diverse body of both law and non-legal disciplines. Even fewer fields of law afford one the opportunity to at once advance the interests of humans and animals alike, and to make a truly positive difference in our world. ♡

Anna Sloan is a 3L student at MSU College of Law, and President of the Student Animal Legal Defense Fund.

The greatness of a nation can be judged by the way its animals are treated.

M.K. Gandhi

Inscription, 2004 Brandi Award to Sen. Carl Levin

Treasurer's Report for 2004

The purpose of this report is to assure the members that the Animal Law Section is very viable with a healthy financial status and your section dues are being spent responsibly. The following is a fair and accurate financial picture of the section.

The expenses related to the general categories below have been consistent with the amounts budgeted for the activities during the year. For instance, we estimate an issue of the newsletter to cost \$400 to \$500 and the issue published this year cost \$452. I have found no "surprise" expenses during the fiscal year.

Therefore, I would like to provide you with a brief summary of the following:

- Section's dues and expenses for the 2004 FY
- Section's overall financial condition at the end of 2004 FY

Dues and expenses were as follows:

- Income from dues was \$3,620 for the fiscal year, representing about 150 members and affiliate members.
- Net expenses of \$2,080 were in five general categories:
 1. The single issue of the newsletter published in late 2003 cost \$452, including printing and mailing. We recognize that a more aggressive publishing schedule is needed to provide more and practical information to section members. Three issues of the newsletter are planned in the 2005 FY.
 2. Seminar net expenses totaled about \$205 (comprised of total expense of \$856 partially offset by seminar revenue of \$651). Our main seminar expenses were lunch for attendees, mailings, and seminar material printing. Our section

members paid a lower rate for the seminar. We were not trying to "make money" with the seminar, as we consider it an essential section function related to education.

3. The annual meeting expenses were \$231, comprised of the Brandi and Sadie awards plaques and room expenses charged by the State Bar.
4. The legislative luncheon held in August cost \$218 and enabled Section Council members to meet with legislative aides and staff members to state legislators and committees. The purpose was to let the aides and staff members know about the Animal Law Section and how its members can provide assistance to them in the legislative process. The meeting was held at the State Bar of Michigan offices to eliminate the need for room expense.
5. We had other expenses of \$973, which were primarily related to numerous Section Council meetings teleconference calls, the Animal Legal Lifeline referral service, a section mailing of the slate of council candidates and by-law changes, and other printing and mailing expenses from the State Bar of Michigan. (Note that the teleconference calls were made with very favorable rates arranged by the State Bar of 7 cents per minute per caller – a very low rate compared to other telephone companies that charge 15 to 50 cents per minute per caller. The teleconference calls at such a low rate have made the council meetings very efficient and quicker by eliminating travel time.)

Our **overall financial condition** at the end of the 2004 FY was sound with a sec-

tion balance of \$10,609 – an improvement of \$1,540 over the end of the 2003 FY.

I have reviewed all expenses and consider them to be reasonable and appropriate and have paid special attention to relating expenses to section actions. The entire Council is very concerned that any costs incurred be reasonable and appropriate and will continue to act accordingly.

I want to mention the Annual Section Council Retreat held in May. This is an opportunity for the Council members to have a regular meeting as well as to discuss future direction and plans for the section. **I want to assure you that no section funds are spent for the retreat and all related expenses are paid by the Council members themselves.**

Let me summarize our financial condition as follows:

- The financial status of the section is sound.
- We understand our revenue and expenses in detail.
- We have made every effort to identify the revenue and expenses by category so that the Section Council understands any financial impact of their decisions.

We are aided in accounting by the State Bar of Michigan Financial Group (as are all sections), which does an excellent job of providing timely and accurate financial information to us.

I have been aided in the analysis of the section financial condition by Donald Garlit, who is a former treasurer of the section. If you have any questions, you can also write to him at donaldgarlit@yahoo.com. ☛

Respectfully submitted,
Wanda Nash
animalscribe@sbcglobal.net

Catherine Wolfe became Treasurer on October 1, 2004.

Senator Levin, Zoo Director Kagan Receive Brandi and Sadie Awards

U.S. Senator Carl Levin and Detroit Zoo Director Ron Kagan received the section's annual Brandi and Sadie awards.

Senator Levin was honored for his outstanding contributions in the area of animal law during his 26 years in the U.S. Senate. "His actions have brought national attention, and much-needed improvement, to the condition of wild, farm, marine, and companion animals" said Section Chair M. Jean Ligon.

In the recently completed 108th Congress, he introduced Senate Resolution 269 urging the government of Canada to end the commercial seal hunt. He cosponsored S 736 to amend the Animal Welfare Act to strengthen enforcement of provisions relating to animal fighting; S 1298 to amend the Farm Security and Rural Investment Act of 2002 to ensure the humane slaughter of downed animals; Senate Congressional Resolution 55 to express strong opposition to commercial whaling; and S 269, Public Law 108-191, Captive Wildlife Safety Act to prohibit import, export, transport, sale, receipt, acquisition, or purchase of certain wildlife species.

Senator Levin received the award at an October ceremony at his Detroit office, which was attended by several section members.

Ron Kagan received national attention when he announced last May that the Detroit Zoo would no longer display elephants, and that he intended to send the zoo's two aging elephants, Wanda and Winky, to a sanctuary in a warmer climate where they would have more room to roam. This decision was not finalized until December, after the American Zoo and Aquarium Association, an accrediting body, agreed



U.S. Senator Carl Levin



*Detroit Zoo Director Ron Kagan
Detroit Zoo Photograph*



*Winky and Wanda the Detroit Zoo Elephants
Oakland Press Photograph*

to reverse its earlier recommendation that the elephants be transferred to another zoo rather than to a sanctuary. Plans are underway to move Wanda and Winky to the PAWS Sanctuary in California.

In giving him the Sadie Award, the Animal Law Section recognizes the courage of Director Kagan in canceling one of the most popular of the zoo's attractions, because of what he believes is best for the animals. 🐘

Yale Conference Attracts 200+ Animal Law Attorneys, Students

By Anna Sloan

The Future of Animal Law Conference was held November 5-7, 2004 at the Yale Law School in New Haven, Connecticut. The Animal Legal Defense Fund sponsored the conference. Section members Bee Friedlander and Barbara Goldman attended, as well as MSU College of Law students Sarah Babcock, Tanya Irwin, Leslie Sauerbrey, and Anna Sloan. They were in the

company of over 200 attorneys and law students from across the country.

The topics covered at the conference included pet trusts, non-economic damages, the next generation of animal cruelty laws, the protection of animals with consumer protection laws, and creating legal rights through implied causes of action and private rights of action. In addition, Profes-

sor David Favre of MSU College of Law discussed "Judicial Recognition of the Interests of Animals – A New Tort." Wayne Pacelle, President and CEO of Humane Society of the United States, and Steven Wise, who discussed his new book analyzing the abolishment of slavery in Great Britain by legal precedent, gave the keynote addresses. 🐾

Anna Sloan is a 3L student at MSU College of Law, and President of the Student Animal Legal Defense Fund

Bob Barker Endows Four Law Schools with \$1 Million Each for Animal Law Studies

Television host and long-time animal advocate Bob Barker has given the field of animal law a shot in the arm by announcing gifts of \$1 million each to Stanford, Columbia, Duke, and the University of California, Los Angeles law schools. Under consideration for endowments are the University of Michigan and Northwestern University Law Schools.

Barker told The Associated Press: "Animals need all the protection we can give them. We intend to train a growing number of law students in this area of the law in the hope that they will



Bob Barker

ultimately lead a national effort to make it illegal to brutalize and exploit these helpless creatures."

Columbia plans to begin an Animal Law Course in Fall 2005. Its environmental law program will focus on how environmental changes may threaten animals. Duke's law school will use part of the endowment to establish the North Carolina Animal Cruelty Project to monitor compliance with the laws and help litigate cruelty cases. 🐾

Now we understand how much more is needed to be able to meet all the physical and psychological needs of elephants in captivity, especially in a cold climate.

Ron Kagan

Announcing the Detroit Zoo's decision to send Wanda and Winky to a sanctuary

MSU College of Law to Publish Journal of Animal Law

The law school recently announced plans to publish a new Journal, with the first volume expected late summer 2005. Deadline for submission of articles for the inaugural issue is April 1. *The Journal of Animal Law* joins *Animal Law* – which has been published by Northwestern School of Law of Lewis & Clark College since 1995 – as a scholarly publication devoted to the topic.

“We plan a more global perspective of animal law issues, exploring how other countries are dealing with the same quandaries animal law proponents are faced with in the United States” says Michelle Hodkin, Editor-In-Chief and MSU College of Law student. Response has been positive: “We have received articles for submission from England and Portugal thus far. The international scope of the *Journal*

will also be evidenced by its online presence, which makes the information more accessible.” Hard copy subscriptions also are available.



The *Journal's* editorial board is comprised of law students. Articles submitted for publication will be subject to a peer review committee of law professionals and professors. Such a committee is unique among law journals according to Hodkin.

Additional information is available at: www.animallaw.info/policy/pojouranimlawinfo.htm . 🐾

Law Student Groups Active in Programs, Education, Fundraising

Editor's Note: More than 50 Student Animal Legal Defense Fund chapters (SALDFs) have formed in recent years, with two at Michigan law schools. A report of their activities follows.

University of Michigan Law School
By Jaime Olin

The group is co-sponsoring a talk by animal attorney Steven Wise on February 16. Wise, author of *Rattling the Cage* and *Drawing the Line*, recently published a book, *Though The Heavens May Fall: The Landmark Trial That Led To The End Of Human Slavery*, about the end of slavery in Britain. He has been active in litigating animal law cases, and teaches “Animal Rights Law” at the Harvard Law School, Vermont Law School, John Marshall Law School, and in the Masters Program in Animals and Public Policy at Tufts University School of Veterinary Medicine.

SALDF members are involved in the effort to bring a Bob Barker endowment to the law school. They will be implementing a community service project. The students sponsor ongoing letter-writing campaigns, focusing on prosecutors and judges in animal cruelty cases. A recent effort was directed toward the federal migratory bird treaty and proposed drilling in the Artic National Wildlife Reserve.

Jaime Olin is a Law 2 Student at U of M Law School, co-founder and chair of the school's SALDF.

Michigan State University College of Law
By Anna Sloan

The group is looking forward to another semester of educating the MSU community about animal-related issues. It is planning an information table regarding the treatment of animals used for food and humane alternatives.

SALDF will be holding its second annual MSU College of Law “Cutest Pet Contest”, which last year raised over \$1,000 for the MSU Chapter of Remote Area Medicine, a veterinary organization that provides care to under-served communities.

Other activities are updating the Pet Friendly Housing List provided to incoming MSU College of Law students; assisting Professor David Favre respond to animal law questions directed to the Animal Legal and Historical Center; and assisting in preparation of the first volume of the *Journal of Animal Law*.

Anna Sloan is a 3L student at MSU College of Law and president of the school's SALDF.

Legislative Update

Editor's Note: A chart showing voting records of all Michigan legislators, prepared by Kieran Marion, Chair of the Section's Legislative Committee, is available at the Section's website, <http://www.michbar.org/animal/pdfs/2004-09-27Votes.pdf>. Complete information is available at the Legislature's website, <http://www.michiganlegislature>.

The following were signed into law during the 2003-04 Legislative Session:

- Public Act 160 of 2004 included mourning doves in the definition of "game" and authorized the Natural Resources Commission to establish the first open season.
- Public Act 242 of 2003 eliminated the sunset for taking of falcons for falconry; established a season for falconers to take not more than 25 live raptors per year; and postponed the repeal from January 4, 2004 to January 4, 2009.
- Public Act 235 of 2004 entered Michigan into Wildlife Violator Compact, which requires authorities to treat residents and nonresidents alike in issuing citations for violations of wildlife laws; and provides for reciprocity in recognizing license suspension and convictions among participating states.
- Public Act 587 of 2004 proposes incorporating three wildlife trust funds (the existing Game and Fish Protection and Nongame Fish and Wildlife funds, as well as a to-be-created Conservation Recreation Legacy and Game and Fish Protection) into the state constitution, subject to voter approval at the November 2006 general election.

Bills introduced but not passed:

- H.B. 6272 to require Department of Natural Resources and Natural Resources Commission to preserve and promote recreational hunting, and promote legislation to classify

animals as game and/or declare the first open season for game.

- HB 5673 to expand definition of livestock by including the raising of equine and cervidae as an "agricultural operation".
- HJR L to amend constitution to provide the right to hunt and fish, to take game and fish, and to camp.
- HB 6221 to require schools to offer alternative to dissection if student expresses moral objection.
- SB 542-543 to outlaw the practice of pound release by government shelters.
- HB 4892 to create "Pets are Wonderful" specialty license plate with proceeds to fund anti-cruelty and spay/neuter programs.
(Note: A license plate bill is expected to be re-introduced in the current session, as part of a three-bill package, which also includes an income tax check-off to fund anti-cruelty and spay-neuter programs, and a "Pet Products Subsidy Bill".)

On-going Mourning Dove Referendum

A signature-gathering effort is underway seeking a referendum election to reject PA 160 of 2004. A coalition of groups has formed the Committee to Restore the Dove Shooting Ban, and must collect approximately 160,000 signatures from registered Michigan voters by March 2005. If sufficient signatures are received, the proposal

will be voted on at the November 2006 General Election, and the mourning dove season (currently September and October) will be cancelled in 2005 and 2006 pending outcome of the election.

Legislative Aides Reception – A Good Introduction

"Since Michigan legislators are term-limited, their aides are increasingly the source of institutional memory. These folks always have been exceptionally important in the legislative process, but their role is even more crucial today," said Kieran Marion, Chair of the Legislative Committee. The Committee sponsored its first reception for legislative aides in August. The purpose was not only to introduce aides to the section and to the variety of animal-related issues facing the legislature, but also to offer section members' expertise in conceiving, drafting, and passing legislation. Several of the aides in attendance took advantage of the offer of assistance during the fall term, and contacted section members for informal discussions about the proposed constitutional amendment, HJR L. 🐦



Chair's Corner

Continued from page 2

for the Symposium online. The online information should be available by early February.

The section council will hold its annual retreat on the weekend of May 13-15, 2005. In addition to the camaraderie of like-minded attorneys that is always a part of these retreats, this year's retreat will focus on strategic planning for the section. It is important that the ideas of the entire section membership are considered as we engage in this process. I want to

remind you that every section member is welcome at the retreat, and I encourage you to attend. If you cannot, then please consider sharing your ideas and vision for the section by e-mailing or writing to me (mjligon@sbcglobal.net) or to any other council member before the retreat. 🐾

Jean Ligon is an attorney with M. Jean Ligon, Attorney at Law, PLC, in Brighton.



Animal Legal Lifeline Report

One of the section's goals is to maintain and operate a referral service. In its first full year of operation under the direction of Wanda Nash, at least 24 people contacted the toll-free line to request legal assistance. The most common problems reported were veterinary medical malpractice, exotic animal issues, and breeder issues. Other callers had legal issues ranging from pet trust preparation to breach of contract between adoption group and adopter to animal custody to landlord tenant to neighbor dispute and more. "In short, we had people who wanted advice from attorneys in the whole gamut of issues that make up 'animal law,'" said Nash.

Currently, most requests for assistance are circulated to the entire section listserv. To increase efficiency, Nash encourages section members to let her know the types of cases they are willing to accept by completing a questionnaire, available on the section's website at <http://www.michbar.org/animal/ALLquestionnaire.cfm>.

All those requesting legal assistance are advised that the service is not necessarily *pro bono* and fees are negotiated individually.

ALL's toll-free number is (866) 211-6257. 🐾

Animal Law Section Council 2004-2005

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Upcoming Events

4th Annual Symposium: Trends in Animal Law

When: Friday, March 11, 2005, 1-5 PM

Where: MSU College of Law, Board Room, East Lansing

Topics/Speakers:

Liability

Julie I. Fershtman,

Board of Commissioners: equine and bailment liability

Barbara Goldman, Animal Law Section: dog bite cases

Use of Consumer Statutes in Animal Cases

Dani Liblang, Chair, Consumer Law Section (to be confirmed)

Update of Michigan Animal Law

A. Rose Stern, Animal Law Section

Upcoming Section Council Meetings

- February 15, 2005, teleconference, 4:30 PM
- March 11, 2005, after Symposium
- May 13-15, Annual Retreat, Brighton

Feb. 16, 7 PM, Michigan League, Ann Arbor

Steven Wise speaks on Animal Law - sponsored by the University of Michigan Law School SALDF. (See U of M Law School article, page 13, for more for more information about the speaker.)

April 20, 2005: Deadline for articles for next Animal Law Section Newsletter

Check the Section website for updates on section activities noted above.



Senator Levin with the Brandi Award.

See page 11 for related article.



Visit our Website: <http://www.michbar.org/animal/>

Join the Section Listserv:

<http://www.michbar.org/animal/listserv.cfm>

Animal Legal Lifeline

**Toll-free Number for Referrals:
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