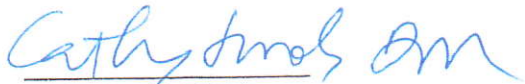


AFFIDAVIT OF DR. CATHY LUND

I, Cathy Lund, DVM, state the following to the best of my knowledge and belief:

1. I am a licensed veterinarian with a practice limited to the treatment of cats.
2. I testified on behalf of the defendant, Heidi Erickson, at her criminal trial in the Boston Municipal Court.
3. I am familiar with the allegations against Mr. Erickson and I have read the trial court's final findings of fact and conclusions of law.
4. It is my professional opinion that the cats did not suffer because of the condition of the apartment.
5. It is my professional opinion that there was no harm to the well-being of the cats because of the condition of the apartment.
6. Evidence of a full litter box does not equate with cruelty; a full litter box is not a cruel act to a cat.
7. Cats do not suffer as a result of a full litter box or stool and/or urine surrounding a full litter box.
8. The cats had staining on their fur that was consistent with tearing and saliva contact.
9. Excessive tearing is a common characteristic of Persian cats: their flat facial bone structure commonly results in a tear duct abnormality that causes excessive build-up of debris and excessive tearing. When the tears oxidize, they turn an orange color.
10. When the cats clean themselves, this discoloration is spread by their saliva. The discoloration the cats had on their paws and hind area was not necessarily caused by urine stains, but was more likely caused by contact with saliva and tears during times when the cats cleaned themselves.
11. In June 2005, I examined the cats after they were returned to Ms. Erickson and all still had staining present on the face.
12. These staining conditions are breed specific, not husbandry specific.
13. Had I been asked at trial about a soiled apartment's effect on the cats, I would have rendered the same opinion I am rendering in this affidavit.

Signed under the pains and penalties of perjury, this 12 day of June 2006



Cathy Lund, DVM