

**LAW OFFICES OF ANDREW S. MANSFIELD**  
45121 UKIAH STREET • P.O. BOX 2402 • MENDOCINO • CALIFORNIA • 95460  
TEL: 707-937-0820 • FAX: 707-937-0834

**By Facsimile Transmission (707-463-4687) and U.S. Mail**

June 26, 2002

District Attorney Norman Vroman  
Courthouse  
P.O. Box 1000  
Ukiah, CA 95462

**Re: *Geddry Dog Shooting (Case Nos. MCSO 1-02-002158 and AC060102-01)***

Dear Mr. Vroman:

I write concerning the status of the above-listed cases. Ms. Geddry's dog was killed by Donald Iversen, with a shotgun loaded with 00 pellets, on her property on June 1, 2002. To date, your office has taken no steps to charge Donald Iversen or his accomplice and brother, John Iversen.

As you know, Lieutenant Robert Arbayo has filed a complaint with your office indicating probable cause exists to arrest both Donald and John Iversen. Lieutenant Arbayo has developed and presented evidence to your office that Donald Iversen is guilty of a violation of Penal Code section 597(a) and Penal Code 374(c). These two offenses are the inhumane killing of a dog and discharging a weapon from a public roadway. John Iversen is named as an accomplice. The report so indicating was filed on June 25, 2002.

As you are aware from the Mendocino County Sheriff's report, Donald Iversen, after being apprehended by the California Highway Patrol, lied to Mendocino County Deputy Sheriff Bushnell about his involvement as the trigger-man in the shooting. It was only after Deputy Bushnell tricked Donald Iversen (by stating that a .22 caliber weapon had been used in the killing) that Donald Iversen accidentally disclosed that he knew a shotgun was the weapon. Confronted with his slip, Donald Iversen confessed.

The delivery of such a brazen lie to a law enforcement officer indicates that Donald Iversen is neither a trustworthy nor an honest individual. His later proffered claim that he shot Ms. Geddry's dog in self-defense is therefore highly suspect.

Further, in reconstructing the scene of the crime, Mendocino County Deputy Sheriff Walker has informed your office that Donald Iversen was standing 2' north of Little Lake Road and 25' west of the Iversen/Geddry property line when he discharged the shotgun. That places him several feet in the middle of the public road and directly in front of Ms. Geddry's property.

I am informed that your office has a history of failing to enforce animal cruelty laws or improperly restricting the scope of such laws. For example, your office does not bring charges of animal cruelty against those who practice illegal animal husbandry or inhumane containment. I do not believe that the people of Mendocino County share your limited view of what constitutes animal cruelty under California law. Further, I fear that your failure to enforce the law in this case is attributable in part to your personal viewpoint.

In addition, I am informed that your office has attempted to influence, thwart, limit and suppress the investigation into this matter for personal reasons. I understand that you have had a public dispute with the Mendocino County Animal Control Office and that you have retaliated against certain personnel for pursuing enforcement of the law after you stated you would not bring charges. On several occasions, you attempted to dissuade Lieutenant Arbayo from completing his investigation into this matter.

Today, I understand that you again complained to the Director of Animal Control over the honest investigation conducted by Lieutenant Arbayo. One can only conclude that Officer Arbayo has challenged your attempt to cover-up or bury the crimes committed by Donald and John Iversen. His lack of "cooperation" resulted in you using your personal influence to have him removed from the case. I am thankful that this occurred only after he was able to file his report with your office.

I understand that the Iversens are long-time residents of Mendocino County. They may even be your friends. I know for certain that Deputy District Attorney Mark Kalina has improperly participated in the Mendocino County Sheriff's investigation because of his relationship with the Iversens. Regardless of this, such disparate treatment under the law is a clear violation of Ms. Geddry's civil rights and demonstrates both nonfeasance and malfeasance in office. Although your office is invested with discretion in determining which cases to prosecute, such discretion may not be exercised for personal or political reasons.

Mendocino County is subject to a higher authority than your office and Ms. Geddry will seek all appropriate remedies at the state and federal level.

Very truly yours,

Andrew S. Mansfield

cc: Ms. Mary Geddry  
Mendocino County Board of Supervisors  
Fort Bragg Advocate-News / Mendocino Beacon  
Ukiah Daily Journal  
Santa Rosa Press Democrat