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GREY2K USA

October 4, 2006

Attorney General Thomas F. Reilly
1 Ashburton Place
Boston, MA 02108

Dear Attorney General Reilly,

I am writing to request a criminal investigation into possible acts of perjury, pursuant to MGL Chapter 128C:7A and Chapter 128C:7, the Greyhound Injury and Disposition reporting laws.

This complaint cites twelve examples of omitted, incomplete, or contradictory information provided, or not provided, in official greyhound injury and disposition reports. Based on this sampling, we believe that employees of the State Racing Commission, Wonderland Greyhound Park, and Raynham-Taunton Greyhound Park may have committed perjury in the conduct of official business.

BACKGROUND INFORMATION

Massachusetts law requires that public records be created and maintained for all racing greyhound dispositions (transfers or exits) and for all racing greyhound injuries suffered in the Commonwealth. In cases where a dog is disposed of due to injury, both a disposition and injury report are required by statute.

Falsification of these reports is a criminal offense. MGL Chapters 128C:7A and 128C:7 state in relevant part:

Disposition and injury forms “shall be completed and signed under the pains and penalties of perjury by the greyhound's owner, trainer or kennel operator, whose signature shall be witnessed by a designated representative of the state racing commission. Whoever knowingly makes a false written statement on a disposition form shall be punished by imprisonment for up to 2 years and a fine of up to \$2,500, or both such fine and imprisonment. A person found guilty of knowingly violating this section for a second or subsequent offense shall be punished by imprisonment for not less than 1, nor more than 5 years, or a fine of not less than \$5,000, or both such fine and imprisonment. Disposition and injury records ... shall be maintained by the state racing commission for a period of 7 years and shall be made readily available to the public upon oral or written request.” (emphasis added)

During 2005 and 2006, GREY2K USA submitted ten written public information requests to the Racing Commission asking for greyhound disposition and injury

PROTECTING GREYHOUNDS NATIONWIDE

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reports. Collectively, these requests sought all disposition and injury reports from January 1, 2005 to August 31, 2006. August 2006 records have not yet been produced.

CHARGE ONE: A GREYHOUND INJURY REPORT FOR “IRUSKA BIG JAKE” WAS NOT PRODUCED BY THE COMMISSION

Public information requests failed to yield an injury report for “**Iruska Big Jake**” (tattoo numbers 91E/98234). Documents independently obtained by this office indicate that “Iruska Big Jake” last raced at Wonderland Greyhound Park on August 23, 2005, and was treated for a broken leg at Bellingham Animal Hospital on September 2, 2005.

CHARGE TWO: DISPOSITION AND INJURY REPORTS FOR “FUZZY’S KONO” INDICATE TWO DIFFERENT DATES OF EUTHANASIA

According to an injury report produced by the Commission and dated March 11, 2006, “**Fuzzy’s Kono**” (53D/19908) was euthanized after the dog “hit fence” and was “bumped” in the “1st turn” while racing. Specifically, Dr. Donald W. Lloyd of Raynham-Taunton Greyhound Park and Dr. Alexandra Lightbown of the Commission describe “euthanasia IV @ Trainer’s request” on this date. However, a separate disposition report signed by Ed Travis of the Commission, indicates that the dog was “put to sleep” on June 15, more than three months after the alleged date of injury.

CHARGE THREE: AN OFFICIAL INJURY REPORT INDICATES THAT A DOG WAS INJURED ON MAY 22, YET A DISPOSITION REPORT FOR THE SAME DOG INDICATES THAT THE DOG HAD LEFT THE RACETRACK SIX DAYS EARLIER

According to an injury report produced by the Commission, “**Fuzzy’s Mr. Money**” (73A/21175) suffered a “career ending” injury at Raynham-Taunton Greyhound Park on May 22, 2006. Specifically, the report signed by Dr. Lightbown indicates that the dog suffered a “luxation + fracture.” However, a “final” disposition report produced by the Commission indicates that the same dog was “returned to owner” on May 16, six days before the injury allegedly occurred. The disposition report was signed by Mr. Travis of the Commission.

CHARGE FOUR: ON AT LEAST EIGHT OCCASIONS, INJURY REPORTS INDICATE THAT DOGS SUFFERED CAREER OR LIFE ENDING INJURIES, YET NO DISPOSITION REPORTS WERE PRODUCED

On at least eight occasions, official injury reports obtained from the Commission indicate that a dog suffered a career or life ending injury, yet public information requests failed to yield disposition (exit) reports for these dogs.

According to an injury report produced by the Commission, “**Fox Trot**” (112E/16192) was euthanized on May 21, 2006 after suffering “radial-ulnar fractures” while racing at Wonderland. However, the Commission has failed to produce a disposition report for “Fox Trot.”

According to an injury report produced by the Commission, “**RHF No Doubt**” (114E/29768) broke her neck while racing at Raynham-Taunton on July 18, 2006. However, the Commission has failed to produce a disposition report for “RHF No Doubt.”

Finally, no disposition reports were produced for “**KB’s Chickadee**” (42C/17010) (injury recorded 1/7/06), “**R and a Red**” (tattoo numbers illegible) (injury recorded 1/7/06), “**Fuzzy’s Edison**” (12B/15374) (injury recorded 2/17/06), “**Ethereal Heroine**” (32D/14412) (injury recorded 3/9/06), “**Pat C. Ulysses**” (52A/12565) (injury recorded 6/26/06) and “**I Am Very Unique**” (32B/22152) (injury recorded 7/4/06). Official injury reports for these dogs, submitted by Raynham-Taunton’s Dr. Lloyd and signed by Dr. Lightbown of the Commission, indicate that these six dogs experienced “career ending” injuries. Once again, public information requests for all disposition (transfer or exit) records for 2006 failed to yield disposition reports for any of these dogs.

CHARGE FIVE: ON AT LEAST ONE OCCASION, AN OFFICIAL DISPOSITION REPORT INDICATES THAT A DOG WAS EUTHANIZED BUT NO INJURY RECORD WAS PRODUCED BY THE COMMISSION

According to an official disposition report produced by the Commission and dated February 6, 2006, “**C.B. Ruby**” (122D/17048), was euthanized because of a broken leg suffered at Raynham-Taunton. However, the Commission has failed to produce an injury report for “C.B. Ruby.”

Thank you in advance for your consideration of this complaint. I trust that you will thoroughly investigate any and all instances of perjurious reporting, and prosecute such crimes to the full extent of the law.

Respectfully,

A handwritten signature in black ink that reads "C. A. Dorchak". The signature is written in a cursive, flowing style.

Christine A. Dorchak, Esq.

enclosures
cc with enclosures: Governor Mitt Romney