

On Friday, September 9, 2022, at approximately 0815 hours, Your Affiant conducted a sworn, audio-recorded telephone interview with Mr. Matthew Pringle, who stated in substance the following:

Mr. Pringle has not seen canines Katie and Darcy for approximately six (6) months, and at that time [six months ago], Katie and Darcy appeared healthy. Mr. Pringle and/or his wife had been routinely bringing food for **Joseph Alex Farkas** and dog food for Katie and Darcy. However, as of late, they had not been supplying these as often.

The last time a bag of dog food was given to **Joseph Alex Farkas**, by either Mr. Pringle or his wife, was "a month" ago. Mr. Pringle described that dog food as a "red bag of Alpo." Based on his description, it was possible the bag of Alpo Your Affiant had observed in the house, still sealed, was the same bag provided by Mr. Pringle one month prior. Mr. Pringle explained that **Joseph Alex Farkas** had been neglecting himself and becoming more distant. When Your Affiant informed Mr. Pringle of the apparent signs of neglect being inflicted upon Katie and Darcy, Mr. Pringle stated, "I'm not surprised."

On Friday, September 9, 2022, at approximately 1000 hours, Your Affiant met, again, with Dr. Guzman. Dr. Guzman explained, in more detail, the results of RASEH's medical report, as well as the results of her independent forensic examination. Dr. Guzman explained that her independent medical opinion was formed from the overall encompassment of RASEH's examinations, her examinations, and the evidentiary photographs and video presented to her by Your Affiant days prior.

During a sworn audio-recorded statement, Dr. Guzman advised Your Affiant of the following, in substance:

Katie and Darcy both **showed signs of significant neglect**. Regarding Katie, originally found to be, seemingly, paralyzed, Dr. Guzman opined that Katie's legs were not broken, neither were they in a state of medical paralysis. Rather, Katie appeared to be suffering from what a human would relate to as an untreated, herniated disc in the spinal column. This herniation, over time, would cause pressure and pain and would significantly reduce the ability of Katie's brain to communicate with her hind legs. So, although Katie believed she was moving her legs, her neurological system would not communicate with her legs.

Dr. Guzman stated Katie's medical issue was not reversible, but was treatable. Dr. Guzman then confirmed her own opinion, when she advised Your Affiant that, after only a few days of placing Katie on a steroid medication, Katie began to have use of her hind legs, supporting herself and walking. Dr. Guzman affirmed that only two actions of Katie's owner would have been considered humane. Those actions would have included **Joseph Alex Farkas** placing Katie on a prescribed steroid, or humanely euthanizing Katie. Dr. Guzman explained the **owner's failure to act** in one of those two ways caused Katie to experience **excessive and repeated unnecessary pain and suffering** until, eventually, her lower extremities became totally numb.

Dr. Guzman then spoke, in more detail, about what she observed in the photographic evidence that Your Affiant had revealed to her. She explained the lengths of Katie's toenails were indicative of a canine who had limited, if any, exposure to the outside elements. It was Dr. Guzman's medical opinion that canines who receive sufficient necessary change of environment (i.e. moving from an indoor environment to an outdoor setting), would have toenails which are routinely filed down by the change of terrain (i.e. asphalt, concrete, dirt, etc.). The length of Katie's toenails helped to develop Dr. Guzman's opinion that Katie had been provided neither the opportunity for outdoor exercise nor a change of air.

Dr. Guzman moved on and spoke about the position in which she saw Katie lying on the floor of **Joseph Alex Farkas**' house. She could immediately identify that Katie was suffering a medical condition with her back legs. This was evident based on the way Katie's legs laid contorted together. That opinion was confirmed by Dr. Guzman's observation of the change in Katie's ability, as she was now able to walk and stand on her own. Dr. Guzman also identified the liquid, which she confirmed as urine, heavily saturating the entirety of Katie's rear torso and lower extremities. Dr. Guzman opined that Katie was suffering from urine scalding, a condition which irritates the skin and causes loss of fur.

Based on the severity of the "urine scalding," Dr. Guzman estimated that Katie had not been provided a change of posture in, possibly, "weeks." Additionally, Katie was unable to escape her discomfort due to her paralysis. Again, Dr. Guzman stated the **failure of Katie's owner** to address this medical issue and provide veterinary intervention **caused Katie to suffer repeated unnecessary pain and suffering.**

In addition to Katie's unkempt toenails, her urine burned skin, and her state of paralysis, Dr. Guzman rated Katie on the Purina Body Condition System (BCS), which is the generally accepted score chart utilized by licensed veterinarians. On the BCS, a canine can score between a one (1) and a nine (9). A canine scoring one (1) is considered to be in a state of total emaciation. A canine scoring four and one-half (4.5) is considered an ideal weight. A canine scoring nine (9) is considered to be overweight.

Katie scored a two (2). Your Affiant queried Dr. Guzman about possible causes of emaciation in domesticated canines. Dr. Guzman opined the most common cause of canine emaciation would be "malabsorption" of nutrients. The malabsorption is most likely experienced with either the presence of parasites or actual starvation, or both. Katie's examinations revealed she was infested with parasites. However, Dr. Guzman advised that after only a few days of steady diet, Katie gained two (2) pounds, which was significant over that short of a time period. **This lead Dr. Guzman to believe the only medical explanation for Katie's severe emaciation, was starvation by her owner, Joseph Alex Farkas.** Although Your Affiant explained to Dr. Guzman his observation of a sealed bag of dog food in the house where Katie was found, Dr. Guzman indicated the **owner was not providing Katie with that, or any other necessary food** in a sufficient quantity.

Dr. Guzman summarized her significant medical concerns regarding Katie. Those concerns were as followed:

Katie's owner **failed to provide** Katie with the necessary **change of air** and environment crucial to a canine's quality of life. **Katie was unable to escape** to a more comfortable change of posture due to her paralysis. Katie's owner **failed to provide** Katie with sufficient, **good and wholesome nourishment**, although the owner was in possession of such goods. Finally, Katie's owner **failed to provide** Katie with necessary **medical treatment**. With each of these failures to act on Katie's behalf, **Joseph Alex Farkas neglected** Katie, causing **excessive and repeated unnecessary pain and suffering.**

Dr. Guzman and Your Affiant then discussed her medical opinion regarding Darcy. According to Dr. Guzman, **Darcy was in a state of hypovolemic shock.** This was explained as the final stages of Darcy's bodily functions shutting down. Darcy was so egregiously dehydrated, her heart was failing to circulate blood throughout her body, causing the "shut down" of her organs. Based on Darcy's advanced hypovolemic shock, Dr. Guzman estimated that **Darcy had "days" left to live.** Dr. Guzman reaffirmed that, for a canine to be "this dehydrated," she would have been without water for an extended period of time, possibly weeks.

Darcy was also found to be infested with parasites that had gone untreated by her owner. Although this was a partial explanation for Darcy's emaciated state, her weight gain over the last few days of care indicated parasites were not the most significant concern. Rather, Darcy's **BCS score of one (1) indicated the emaciation was the result of medical neglect, but mostly, actual starvation.** In fact, Dr. Guzman expressed her concern that Darcy was so severely starved, that her skull bones were prevalent. This was because Darcy's body had begun to utilize that supportive muscle and tissue surrounding the skull to extend Darcy's life. This confirmed what Your Affiant had previously observed as the appearance of a "sagging skull."

Furthermore, Darcy's gums were surrounded in plaque buildup, causing a gum infection. Dr. Guzman stated that, based on accepted community standards of canine care, simple compassion from the owner showing an effort to brush Darcy's teeth could have prevented this infection's progression. The gum infection and plaque buildup was another indicator to Dr. Guzman that Darcy had not seen a veterinarian in "some time." She explained this opinion by her general knowledge that veterinarians offer teeth cleanings for canines during annual appointments. Additionally, and similar to Katie, Darcy's toenails were unkempt, indicating her lack of exposure to a changing environment and open air.

Dr. Guzman summarized her significant medical concerns regarding Darcy. Those concerns were as followed:

Darcy's owner **failed to provide** the necessary change of air and environment crucial to a canine's quality of life. **Darcy was unable to escape** to a more comfortable change of posture due to the muscle loss, which severely challenged her ability to move on her own. Darcy's owner **failed to provide** Darcy with sufficient, **good and wholesome nourishment**, although the owner was in possession of such goods. Finally, Darcy's owner **failed to provide** Darcy with necessary **medical treatment**. With each of these failures to act on Darcy's behalf, **Joseph Alex Farkas neglected Darcy, causing excessive and repeated unnecessary pain and suffering.**

Your Affiant presented Dr. Guzman with the evidentiary documents which were recovered by Supervisor Straight as a result of the aforementioned Search Warrant served upon Animal Care Clinic of Titusville. These documents included the veterinary medical treatment history on record within **Joseph Alex Farkas' files** for Katie and Darcy. **Dr. Guzman confirmed what Your Affiant had previously interpreted** about Katie and Darcy and the **failure of Joseph Alex Farkas to provide them with standard and regular veterinary care.** Dr. Guzman stated that, according to the records she was provided, neither Katie nor Darcy had been treated by a veterinarian in excess of the last two years. Through these records, Dr. Guzman identified that, in 2019, Katie weighed 56 pounds and Darcy weighed 48.8 pounds. As of September 8, 2022, and one (1) week after Joseph Alex Farkas surrendered Katie and Darcy to BCSO, Katie's weight registered at 38.4 pounds. Darcy's weight registered at 31.6 pounds. In the temporary care of RASEH, Katie had already gained two (2) pounds and Darcy had gained three (3) pounds.

Later, this same day (September 9, 2022), at approximately 1140 hours, Your Affiant located Katie and Darcy under the care of staff at the BCSO SACC. This day was **eight (8) days after Katie and Darcy had begun to receive interventional medical treatment.** Katie and Darcy were observed during exercise within the enclosed area the BCSO SACC. **Katie was walking on her own.** She walked hastily as she explored the areas of the play pen. Darcy was observed exhibiting a positive attitude. Darcy's tail was wagging. She was showing affection to SACC employees. Finally, rather than being

unable to move as was observed while in the care of **Joseph Alex Farkas**, Darcy was actively **standing on her hind legs and jumping on staff members** for attention.

Based on the evidence uncovered, statements from the witness, Dr. Guzman's independent medical opinion, and **Joseph Alex Farkas'** own acknowledgment that he was in custody and control of Katie and Darcy and had **failed to provide care for their "sickness"**, Your Affiant determined that **Joseph Alex Farkas** did own and have custody and control of his canine, Katie; and did unlawfully and knowingly confine Katie in her residence and failed to supply Katie, during such confinement, with a sufficient quantity of good and wholesome food and water and did keep Katie in her residence without exercise and change of air; and **Joseph Alex Farkas** did unlawfully and unnecessarily deprive Darcy of necessary medical treatment in a cruel and inhumane manner; and **Joseph Alex Farkas** did intentionally commit acts to Katie, by **failing to provide necessary sustenance and veterinary care, causing excessive infliction of unnecessary pain and suffering**; and **Joseph Alex Farkas** did own and have custody and control of his canine, Darcy; and did unlawfully and knowingly confine Darcy in her residence and failed to supply Darcy, during such confinement, with a sufficient quantity of good and wholesome food and water and did keep Darcy in her residence without exercise and change of air; and **Joseph Alex Farkas** did unlawfully and unnecessarily deprive Darcy of necessary medical treatment in a cruel and inhumane manner; and **Joseph Alex Farkas** did intentionally commit acts to Darcy, by **failing to provide necessary sustenance and veterinary care, causing excessive infliction of unnecessary pain and suffering**. Therefore, Your Affiant has probable cause to believe, and does believe, the above listed probable cause leads to the substantiation that defendant, **Joseph Alex Farkas**, has committed a violation of the laws of the State of Florida, to wit: **Two (2) Counts Animal Cruelty – Felony, contrary to section 828.12(2), Florida Statute, and Two (2) Counts Unlawful Confinement of Animal – Misdemeanor, contrary to section 828.13, Florida Statute.**

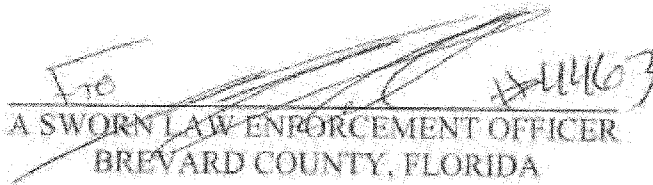
Your Affiant, Animal Cruelty Investigator, Agent Aaron Becker/ID# 3939, (hereinafter referred to as Your Affiant) is certified by the State of Florida Commission of Criminal Justice Standards and Training as a Law Enforcement Officer, and whose training and experience is as follows: Your Affiant is a sworn Law Enforcement Officer employed as a Deputy Sheriff in and for the Brevard County Sheriff's Office in the State of Florida and employed as such since 2016. Your Affiant has successfully satisfied the Florida Standards and Training Requirements by attending Eastern Florida State College Law Enforcement Academy, which included training in felony crimes, controlled substance identification, and enforcement courses. Your Affiant is currently assigned to the Brevard County Sheriff's Office Animal Services Unit as an Animal Cruelty Investigator, Agent, whose primary function is to supervise and investigate cruelty and crimes against animals. During Your Affiant's law enforcement career, he has employed methods of investigation including, but not limited to, visual surveillance, electronic surveillance, and interrogations. Your Affiant's work experience includes, but is not limited to, US Army Military Police Corrections/Detention Specialist, Dual Sworn Deputy Sheriff, Field Training Officer, Investigative Agent, advanced training in Interviews and Interrogations, certification as an FDLE Instructor, and Your Affiant holds a B.A. Degree in Homeland Security, with a concentration in National Security Studies, from American Military University.

WHEREAS, Your Affiant makes this affidavit and prays for the issuance of an Arrest Warrant with authority to effect the arrest of Joseph Alex Farkas, for the violation of the laws of the State of Florida, to wit: Two (2) Counts Aggravated Animal Cruelty - Felony, contrary to Florida Statute 828.12(2) and Two (2) Counts Unlawful Confinement of Animal - Misdemeanor, contrary to Florida Statute 828.13, which occurred at 2289 Holder Road, Mims, Brevard County, Florida, 32754.

 #3939

Animal Cruelty Investigator, Agent Aaron Becker/ID# 3939  
Brevard County Sheriff's Office  
Affiant

SWORN TO AND SUBSCRIBED BEFORE ME THIS 12 DAY OF September,  
A.D. ~~2022~~ BY Animal Cruelty Investigator, Agent Aaron Becker/ID# 3939 (Affiant)  
WHO IS PERSONALLY KNOWN TO ME OR WHO PRODUCED Personnel known  
AS IDENTIFICATION.

 #11463  
A SWORN LAW ENFORCEMENT OFFICER  
BREVARD COUNTY, FLORIDA