

STATE OF NEW MEXICO
TWELFTH JUDICIAL DISTRICT
COUNTY OF OTERO

STATE OF NEW MEXICO,
Plaintiff,

vs.

~~DR. RICK LEE, DVM~~
Defendant

Address:
D.O.B:
SSN:
STN:

and

CHARLES RIVER LABORATORIES, INC.
Defendant.

**JAMES C. FOSTER, Chairman, President and
Chief Executive Officer**

Address: 251 Ballardvale St.
Wilmington, MA 01887

CRIMES:

**COUNTS 1-3: ANIMAL CRUELTY, NMSA 1978 Section 30-18-1B(1),(2) & D,
Misdemeanors.**

CRIMINAL COMPLAINT

The undersigned, under penalty of perjury, complains and states that in Otero County, State of New Mexico, the above named defendants did:

Count I: on or about the 16th day of September, 2002 did abandon or otherwise failed to provide necessary sustenance to a 16 year old Chimpanzee named Ashley (identification number 1396), an animal under the custody and control of the defendants, in that, the defendants, knowing Ashley had suffered a grave wound to her sex skin, abandoned her care and left her without qualified animal care personnel and in the "care" of untrained night security guards at which time

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DISTRICT COURT OF
OTERO COUNTY, N.M.

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she died.

Count II: on or about the 30th day of December, 2002 did abandon or otherwise failed to provide necessary sustenance to a 16 year old Chimpanzee named Rex (identification number CA0147), an animal under the custody and control of the defendants, in that the defendants, knowing Rex had failed to wake up from anesthesia for a physical examination the day prior to, and on the day of his death, and knowing that animal care personnel had to manually suction vomit numerous times from his mouth, did abandon his care and left him without qualified animal care personnel and in the "care" of untrained night security guards at which time he died.

Count III: on or about the 26th day of June, 2003 did abandon or otherwise failed to provide necessary sustenance to a 26 year old Chimpanzee named Topsy (identification number 1223), an animal under the care and custody of the defendants, in that the defendants, knowing that she had suffered a grave wound to her sex skin, abandoned her care and left her without qualified animal care personnel and in the 'care' of untrained night security guards.

Contrary to Section 30-18-1B(1),(2) & D n 1978 NMSA, misdemeanors.

I SWEAR OR AFFIRM UNDER PENALTY OF PERJURY THAT THE FACTS SET FORTH ABOVE ARE TRUE TO THE BEST OF MY INFORMATION AND BELIEF. I UNDERSTAND THAT IT IS A CRIMINAL OFFENSE SUBJECT TO THE PENALTY OF IMPRISONMENT TO MAKE A FALSE STATEMENT IN A CRIMINAL COMPLAINT.

John Stubbs
Complainant

Investigator
Title

Approved:
Scott A. Key
District Attorney
Title