

2025-26

Wisconsin High School
Mock Trial Tournament
Case Materials

Regan Kazoo

vs.

Wisconsin Ostriches Farm and Fun, Inc.

Plaintiff Witnesses:

Regan Kazoo

Reese Grobbelaar

Cassidy O'Wary

Defense Witnesses:

Montana Jake

Blake Deadly

Camille Rhea

Stipulations/Pre-Trial Rulings

1. All of the exhibits are authentic and the authenticity of an exhibit is never at issue. All witnesses have authenticated exhibits containing their initials and/or names and exhibits to which they refer in their affidavits, and the accuracy of the dates thereon. Authentic exhibits are not necessarily admissible at trial.
2. All witness affidavits have been properly signed and notarized. The electronic signatures on each affidavit's signature line and notary block are to be treated as authentic signatures. This stipulation does not apply to exhibits. Names of the notary publics are not relevant to the presentation of the case. Each witness has reviewed their affidavit the morning of trial, attested that it was true and accurate, and attested that there was nothing that they had forgotten or wanted to add, including content for exhibits.
3. Each witness affidavit/report is intended to be gender-neutral and should be interpreted as such. All witness affidavits use "they" as a singular pronoun, in order to be gender neutral. Both the Chicago Manual of Style and the Associated Press Stylebook now recognize "they" as an acceptable singular gender-neutral pronoun. Attorneys may (but are not required to) bring this stipulation to the attention of judges in pretrial matters if their teams wish to use "they" as a singular pronoun. In any event, judges are instructed not to downgrade scores due to the use of "they" as a singular, gender-neutral pronoun.
4. Any individuals named in this problem but not identified as witnesses are *not* unavailable witnesses: the attorneys handling the case simply chose not to call them as witnesses at trial.
5. This problem refers to "Nudge," a social media platform. Much like Clearwater, Wisconsin is a fictitious city in which mock trial problems take place, "Nudge" is the fictitious social media platform as a part of the same mock trial universe.
6. This case is bifurcated. The underlying claim is being tried in this case; if the Plaintiff is successful, damages will be tried at a later date.
7. All opinions contained in the affidavits of Cassidy O'Wary and Camille Rhea are made to a reasonable degree of professional certainty. In Motions *in Limine*, the methods, practices, training, skills, knowledge, qualifications and expertise of these witnesses were addressed in pre-trial *Daubert* hearings, and the Court determined that both witnesses could offer opinions related to their fields. Specifically, O'Wary may offer opinions related to the appropriate standard of care in running and maintaining an ostrich farm and Rhea may offer opinions related to the care and behavior of large, flightless birds, including ostriches. This ruling was based upon the expected trial testimony from the affidavits: this does not relieve any party of the need to lay foundation for expert opinions, nor does it remove either party's ability to attack the credentials of an expert, if appropriate, for the jury's consideration in determining the weight to give to any opinion.
8. The case materials contain an Amended Complaint and an Answer to the Amended Complaint. Both pleadings were amended from their original forms to reflect Court rulings on Motions to Dismiss and Motions for Summary Judgment filed by both parties:

- (a) The original Complaint contained a claim for trespass, which was dismissed as a matter of law because civil trespass claims can only be brought for human trespass, not animal trespass.
- (b) The original Complaint sought damages under Wisconsin laws providing strict liability for owners of animals at large, which was dismissed as a matter of law because the applicable statutes do not list ostriches among the animals covered by the statute.
- (c) The original Complaint contained a claim under the Wisconsin Safe Place statute which provides standards that owners of places of employment must be held to, and liability in the event that failure to meet those standards results in injury at the place of employment. The claim was dismissed as a matter of law because the Plaintiff does not claim that the injury occurred at a place of employment.
- (d) The Defendant moved for summary judgment claiming they were protected by recreational and agricultural tourism immunities. Those motions were denied, because the Plaintiff was not participating in a recreational activity or agricultural tourism at the time of the alleged injury.

The fact of these prior court rulings is not admissible: this is simply provided as background information as to what claims do and do not appear in the amended documents, and why.

9. The parties have stipulated and the Court has taken judicial notice of the fact that a men's size 9/women's size 10 Adidas Gazelle shoe is 10.4" long.
10. Cassidy O'Wary attempted to have their subpoena quashed due to a non-disclosure agreement. The Court conducted a hearing and considered all relevant information. The Court denied Cassidy O'Wary's motion to quash, and said that O'Wary must still testify and that testimony cannot be restricted in any way on the basis of the nondisclosure agreement, though the rules of evidence still apply to their testimony.
11. The Amended Complaint indicates that the Wisconsin Department of Natural Resources has twice determined the ostrich enclosures at WOFF! failed to meet minimum specifications for animal enclosures and animal exhibition in Wis. Admin. Code NR §§ 16.30 and 16.35. For reasons related to trial length and avoiding bringing additional witnesses, the applicable reports are not being offered as exhibits. Instead, the parties have stipulated that the code violations were as follows:
 - (a) 2021 - inadequate enclosure in violation of administrative code causing ostrich escape, danger to the public; ostrich located at McDonald's drive-thru after it stole breakfast food; corrective action plan: reinforce enclosures
 - (b) 2023 - enclosure left open in violation of administrative code causing ostrich escape, danger to the public; ostrich located at Denny's when it stole breakfast food and didn't pay; corrective action plan: install security cameras, implement closing procedures checklist, stop feeding breakfast food to ostriches

This stipulation does not make this information admissible: admissibility is an evidentiary matter for the Court to decide based upon the foundation laid with the testifying witness and the applicable rules of evidence.

12. The Court considered whether to include a jury instruction and special verdict particular to liability of owners or keepers of animals. Because that common instruction and verdict do not encompass the full issues claimed in this case, the Court decided to use a standard negligence instruction, to avoid unnecessary extra instructions and verdict questions that do not fully fit the facts and allegations, and to avoid confusion for the jury.
13. The parties have stipulated that the type of shoe shown on the right side of Exhibit J made the impression shown on the left side of Exhibit J. No party may argue that the footprint does not match the shoe.

Disclaimer

The 2025-26 mock trial case is a hypothetical case. All names used in the mock trial case are fictitious and were created to be gender-neutral. Any similarity to an actual event or to the name of an actual person is strictly coincidental.

Exhibits

Please note that exhibits are pre-marked. The pre-marking of exhibits is solely a convenience. It is not intended to suggest the order in which exhibits should be used nor is it intended to suggest anything about their admissibility. In addition, the pre-marking of exhibits is not intended to suggest that all exhibits must or should be used. Some may be marked in sub-sections. Those may be used independent of one another, subject to the rules regarding foundation and admissibility.

REGAN KAZOO,
14 N3487 County Hwy. K
Clearwater, Wisconsin

Plaintiff,

v.

Court Case No. 2025-CV-632
Case Code: 30107
Personal Injury - Other

WISCONSIN OSTRICHES
FARM AND FUN, INC.,
c/o Montana Jake,
Owner and Registered Agent,
10 Ostrich Way
Clearwater, Wisconsin

and

COVERAGE MUTUAL
INSURANCE COMPANY
c/o Serve Us Here,
Registered Agent
1528 Progress Lane
Clearwater, Wisconsin

Defendants.

AMENDED COMPLAINT

Plaintiff, by their attorneys, as and for their complaint against the defendant, alleges and shows to the Court as follows:

1. Plaintiff Regan Kazoo is an adult resident of Clearwater County, Wisconsin, whose address is 14 N3487 County Hwy. K, Clearwater, Wisconsin, 53486. Kazoo is the President and Executive Director of Freedom for Ostriches, Wisconsin (FFOW), a nonprofit organization dedicated to emancipating all captive wild animals in Wisconsin through education and advocacy.

2. Defendant Wisconsin Ostriches Farm and Fun, Inc. (hereafter "WOFF") is a non-stock corporation doing business in Clearwater, Wisconsin. WOFF has a principal office at 10 Ostrich Way, Clearwater, Wisconsin, and a Registered Agent of Montana Jake at the same address. Upon information and belief, Montana Jake is the principal owner of WOFF. WOFF is a captive wild animal farm licensed per Wis. Stat. § 169.15 and Wis. Admin. Code NR § 16.15.

3. Coverage Mutual Insurance Company is an insurance company that is licensed to do business in the State of Wisconsin. The Registered Agent for Service of Process of Coverage Mutual Insurance Company is Serve us Here, 1528 Progress Lane, Clearwater, Wisconsin. Coverage Mutual Insurance Company does substantial business in Clearwater County. Upon information and belief, at all times relevant hereto, Coverage Mutual Insurance Company had policies of liability insurance coverage in place that provided coverage for the negligent, reckless, and intentional acts of WOFF, by and through its owner, Montana Jake, and its other employees, members, and agents.

4. For at least ten years and at all times relevant hereto, WOFF, under the direction and supervision of Montana Jake, has been in the business of, among other things, breeding, raising, confining, keeping, slaughtering, exhibiting, and selling up to 20 captive ostriches at a time. Upon information and belief, with the exception for on-farm sales, WOFF's only wholesale customer for its ostrich products is a Clearwater-based restaurant called Birds of a Feather.

5. In addition, at all times relevant hereto, WOFF has been in the business of opening its property to members of the public who pay admission to view the WOFF operations and view the ostriches in captivity.

6. At no time relevant hereto was Plaintiff a member of the public who entered the WOFF property to engage in a recreational or agricultural tourism activity.

7. Over the years, ostriches have escaped their enclosures and have assaulted patrons on WOFF! property. On information and belief, Defendants have concealed damages caused by ostrich escapes, buying silence from victims.

8. At least two times in the past 10 years, ostriches have picked the locks or broken free from captivity, have been found roaming Clearwater public spaces, and on information and belief, have stolen and absconded with breakfast food.

9. According to publicly available documents on file with the Wisconsin Department of Natural Resources (DNR), the DNR has twice determined the ostrich enclosures at WOFF! failed to meet minimum specifications for animal enclosures and animal exhibition in Wis. Admin. Code NR §§ 16.30 and 16.35.

10. On the evening of May 19, 2025, Plaintiff Kazoo had gone to bed early. Around 5:00 a.m. the next day—May 20, 2025—when Kazoo was making breakfast, a large, enraged female ostrich broke through the front screen door of Kazoo’s house and violently kicked Kazoo in the right shin, causing Kazoo to topple over in pain on the kitchen floor.

11. The ostrich ran from room to room, ransacking the entire home, tipping over furniture and knocking Kazoo’s entire family of crystal elephant figurines with her powerful neck. The ostrich next turned to the basement door, kicking and pounding, causing the door to crack and jam.

12. Eventually, the ostrich gave up, and retreated from the home through the open back sliding screen door.

13. Terrified, confused, and in excruciating pain, Kazoo dragged themselves across the floor and used the couch arm to pull themselves up to a stand, when suddenly, the ostrich burst back through the open back sliding screen door, charged at Kazoo, and kicked Kazoo’s left knee cap,

sending Kazoo into a screaming fit of agony.

14. The ostrich trampled over Kazoo and into the kitchen, where she knocked the skillet of eggs and bacon to the ground. She quickly slurped up the eggs and stuffed all the bacon in her beak, before being chased out the back door by a neighbor's dog, leaving Kazoo writhing on the floor.

15. Kazoo's neighbor came to the rescue called for an ambulance to bring Kazoo to the hospital, where Kazoo endured a six-hour surgery to fix a broken kneecap.

16. The ostrich that caused these damages was owned by WOFF, and had escaped the WOFF premises and entered Kazoo's property.

17. As a direct and proximate result of WOFF's failures as described further herein, Kazoo has suffered extreme pain, lost mobility, and has become extremely frightful of all birds. In addition to Kazoo's past and future physical and mental pain and suffering, Kazoo has incurred substantial medical bills and may incur future medical bills. Kazoo did not have health insurance to pay those bills, which have remained outstanding. Kazoo has also suffered past and future wage loss/earning capacity, property damage, humiliation, loss of enjoyment of life and other miscellaneous damages.

First Claim: Negligence

18. Plaintiff incorporates by reference the preceding paragraphs as if set forth in full herein.

19. WOFF, by its owners, operators, employees, and agents, owed a duty of ordinary care to the public, including Plaintiff.

20. In failing to maintain its premises and its enclosures in a manner that comports with licensing requirements, in failing to maintain its premises in a manner that would keep the

ostriches contained and from running at large, in failing to train and supervise its employees in correct procedures to ensure ostriches would not be able to escape, and/or in failing to have in place safeguards (such as functioning surveillance cameras) that would alert them to an escaped ostrich so they could attempt to retrieve it before it caused harm, WOFF breached its duty of ordinary care.

21. WOFF's above-referenced breach of ordinary care caused damages to Plaintiff.
22. WOFF is liable for Plaintiff's damages.

WHEREFORE, Plaintiff demands that judgment be entered in its favor and against the defendants, WOFF and Coverage Mutual Insurance Company, for the amount of compensatory damages found to be appropriate, together with the costs and disbursements of this action.

PLEASE TAKE NOTICE THAT THE PLAINTIFF HEREBY DEMANDS TRIAL BY A TWELVE-PERSON JURY.

Dated at Clearwater, Wisconsin this 6th day of September, 2025.

JUSTICE FOR PLAINTIFFS S.C.
Attorneys for Plaintiff

By: /s Kristen E. Lonergan
State Bar # 1000000

STATE OF WISCONSIN

CIRCUIT COURT

CLEARWATER COUNTY

REGAN KAZOO,

Plaintiff,

v.

WISCONSIN OSTRICHES
FARM AND FUN, INC.,

and

COVERAGE MUTUAL
INSURANCE COMPANY

Defendants.

Court Case No. 2025-CV-632
Case Code: 30107
Personal Injury - Other

ANSWER TO AMENDED COMPLAINT AND AFFIRMATIVE DEFENSES

Defendants Wisconsin Ostriches Farm and Fun, Inc. (“WOFF”) and Coverage Mutual Insurance Company, by and through their attorneys, as and for its Answer and Affirmative Defenses to Plaintiff’s Amended Complaint, allege and state as follows:

For an answer to the paragraphs with the same number in Plaintiff’s Amended Complaint:

1. Admit.
2. Admit.
3. Admit.
4. Admit.
5. Admit.
6. Deny and put Plaintiff to their proof. Affirmatively allege that Plaintiff has entered WOFF property for purposes of protest and suspected vandalism.
7. Deny and put Plaintiff to their proof.

8. Admit.
9. Admit.
10. Deny and put Plaintiff to their proof. Affirmatively allege that Plaintiff Kazoo was negligent and that Plaintiff's own negligence was the cause of their injuries and damages. In the alternative, affirmatively allege that Plaintiff Kazoo was injured while they were on WOFF property without consent.
11. Deny and put Plaintiff to their proof.
12. Deny and put Plaintiff to their proof.
13. Deny and put Plaintiff to their proof.
14. Deny and put Plaintiff to their proof.
15. Deny and put Plaintiff to their proof.
16. Admit that the mama ostrich that was found belonged to WOFF. Deny the remaining allegations and put Plaintiff to their proof.
17. Deny Plaintiff suffered any of the alleged damages as a result of Defendant's actions and puts Plaintiff to their proof. As to the remainder of these allegations, Defendant lacks information sufficient to form a belief as to the truth of the matter asserted, and therefore denies and puts Plaintiff to their proof.

First Claim: Negligence

18. Defendant incorporates by reference each of their prior responses to the preceding allegations as if set forth in full herein.
19. Admit.
20. Deny that the enclosures at WOFF were in any way deficient or able to be opened by the ostriches. Affirmatively allege that they were opened by Plaintiff. As to the

remaining allegations, deny and put Plaintiff to their proof.

21. Deny and put Plaintiff to their proof.

22. Deny and put Plaintiff to their proof.

AFFIRMATIVE DEFENSES

1. Any of Plaintiff's damages were caused by their own actions.
2. Plaintiff's Complaint fails to state a claim upon which relief can be granted.
3. Plaintiff may have failed to mitigate its damages, if any.
4. Affirmatively allege all affirmative defenses in Wis. Stat. 802.06(2) not specifically raised above for the sake of preservation.
5. Defendant reserves the right to amend or supplement this Answer and Affirmative Defenses.

WHEREFORE, Defendants demand that judgment be entered dismissing Plaintiff's Complaint and all allegations therein with prejudice; and for all such further relief the Court deems just and equitable.

Dated at Clearwater, Wisconsin this 15th day of October, 2025.

WE'VE GOT YOUR BACK LLP
Attorneys for Defendant

By: /s Elleny Christopoulos
State Bar # 1000001

STATE OF WISCONSIN

CIRCUIT COURT

CLEARWATER COUNTY

REGAN KAZOO,

Plaintiff,

v.

Case No. 2025-CV-632

WISCONSIN OSTRICHES
FARM AND FUN, INC.,

and

COVERAGE MUTUAL
INSURANCE COMPANY

Defendants.

JURY INSTRUCTIONS

BURDEN OF PROOF: ORDINARY

Certain questions in the verdict ask that you answer the questions “yes” or “no.” The party who wants you to answer the questions “yes” has the burden of proof as to those questions. This burden is to satisfy you by the greater weight of the credible evidence, to a reasonable certainty, that “yes” should be your answer to the verdict questions.

The greater weight of the credible evidence means that the evidence in favor of a “yes” answer has more convincing power than the evidence opposed to it. Credible evidence means evidence you believe in light of reason and common sense.

“Reasonable certainty” means that you are persuaded based upon a rational consideration of the evidence. Absolute certainty is not required, but a guess is not enough to meet the burden of proof.

CREDIBILITY OF WITNESSES; WEIGHT OF EVIDENCE

It is the duty of the jury to scrutinize and to weigh the testimony of witnesses and to determine the effect of the evidence as a whole. You are the sole judges of the credibility, that is, the believability, of the witnesses and of the weight to be given to their testimony. In determining the credibility of each witness and the weight you give to the testimony of each witness, consider these factors: whether the witness has an interest or lack of interest in the result of this trial; the witness’ conduct, appearance,

and demeanor on the witness stand; the clearness or lack of clearness of the witness' recollections; the opportunity the witness had for observing and for knowing the matters the witness testified about; the reasonableness of the witness' testimony; the apparent intelligence of the witness; bias or prejudice, if any has been shown; possible motives for falsifying testimony; and all other facts and circumstances during the trial which tend to either support or to discredit the testimony. Then give to the testimony of each witness the weight you believe it should receive. There is no magic way for you to evaluate the testimony; instead, you should use your common sense and experience. In everyday life, you determine for yourselves the reliability of things people say to you. You should do the same thing here.

CIRCUMSTANTIAL EVIDENCE

It is not necessary that every fact be proved directly by a witness or exhibit. A fact may be proved indirectly by circumstantial evidence. Circumstantial evidence is evidence from which a jury may logically find other facts according to common knowledge and experience.

Circumstantial evidence is not necessarily better or worse than direct evidence. Either type of evidence can prove a fact.

EXPERT OPINION TESTIMONY

Usually, witnesses can testify only to facts they know. But, a witness with specialized knowledge in a particular field may give an opinion in that field. In determining the weight to be given an opinion, you should consider the qualifications and credibility of the expert and whether reasons for the opinion are based on facts in the case. Opinion evidence was admitted in this case to help you reach a conclusion. You are not bound by any expert's opinion.

NEGLIGENCE

A person is negligent when they fail to exercise ordinary care. Ordinary care is the care which a reasonable person would use in similar circumstances. A person is not using ordinary care and is negligent, if the person, without intending to do harm, does something (or fails to do something) that a reasonable person would recognize as creating an unreasonable risk of injury or damage to a person or property.

In this case, the defendant is a business, Wisconsin Ostriches Farm and Fun, Inc. ("WOFF"). You should apply the above analysis to the actions and inactions of the owners, agents, and employees of WOFF, through their own actions and through their hiring, training, and supervision.

CAUSE

In answering questions 2 and 4, you must decide whether someone's negligence caused the Plaintiff's injuries. These questions do not ask about "the cause" but rather "a cause" because an injury may have more than one cause. Someone's negligence caused the injury if it was a substantial factor in producing the injury. An injury may be caused by one person's negligence or by the combined negligence of two or more people.

CONTRIBUTORY NEGLIGENCE

Every person in all situations has a duty to exercise ordinary care for their own safety. This does not mean that a person is required at all hazards to avoid injury; a person must, however, exercise ordinary care to take precautions to avoid injury to themselves. To be free of negligence, a person must exercise ordinary care in choosing their course of conduct and in the pursuit of that choice. A person is not negligent in making a choice of conduct if the person has no knowledge that one course of conduct carries a greater hazard than another, provided that the lack of knowledge is not the result of the person's failure to exercise ordinary care.

COMPARATIVE NEGLIGENCE: PLAINTIFF AND ONE OR MORE DEFENDANTS

If, by your previous answers, you are required to answer this question, you will determine how much and to what extent each party is to blame for Regan Kazoo's damages. You will decide the percentage (a portion of 100%) attributable to each party in causing the Plaintiff's damages.

The burden of proof on these subdivisions is on the party who asserts the percentage of causal negligence attributable to the other, and that party must satisfy you to the greater weight of the credible evidence, to a reasonable certainty, what your answer should be.

STATE OF WISCONSIN

CIRCUIT COURT

CLEARWATER COUNTY

REGAN KAZOO,
Plaintiff,

v.

WISCONSIN OSTRICHES
FARM AND FUN, INC.,

and

COVERAGE MUTUAL
INSURANCE COMPANY

Defendants.

Case No. 2025-CV-632

SPECIAL VERDICT

Question 1: On or before May 20, 2025, was Wisconsin Ostriches Farm and Fun, Inc. (WOFF), by its owners, agents, and/or employees, negligent?

(Circle one) Yes / No

Question 2: If you answered “yes” to Question 1, then answer this question:
Was this negligence a cause of Regan Kazoo’s injuries?

(Circle one) Yes / No

Question 3: If you answered “yes” to Questions 1 and 2, then answer this question:
On or before May 20, 2025, was Regan Kazoo negligent with respect to their own safety?

Question 4: If you answered “yes” to Question 3, then answer this question:
Was Regan Kazoo’s negligence a cause of their own injuries?

(continued on next page)

Question 5: If you answered “yes” to Question 4, then answer this question:
Taking all of the negligence that combined to cause Regan Kazoo’s injuries as
100%, what percentage of negligence do you attribute to:

A. WOFF (by its owners, agents, and/or employees) _____ %

B. Regan Kazoo _____ %

Total: 100%

AFFIDAVIT OF REGAN KAZOO

Regan Kazoo, first being duly sworn, states as follows:

1. My name is Regan Kazoo. I am 43 years old. More than anything, I look up to the
2 Owl. Wise, watchful, intuitive.

3. I've lived in Clearwater, Wisconsin my entire life. I loved growing up here. As a
4 child, I spent my summers on the Wisconsin river, swimming, rafting, and bird watching. It was
5 on those banks and bluffs where I developed a keen appreciation for nature, and all that is wild
6 and free. When my family would go camping, after everyone went to sleep, I'd crawl out of the
7 tent and climb as high as I could in the trees. At dawn, I watched eagles soaring high over the river,
8 and swooping down to snatch up prey in their strong talons. Snakes slithering in the underbrush,
9 waiting patiently, and at just the right moment, striking on their prey, swallowing unsuspecting
10 mice. I saw the occasional black bear, frolicking in the river, grabbing unsuspecting fish and eating
11 them like they were an ear of corn. Animals should be free to live and to hunt. That is the natural
12 order of things.

13. I'd known Montana Jake, whom I've always called MJ because I don't think people
14 should be named after States, my whole life. We grew up a few doors down from each other. When
15 we were kids, we were inseparable – true BFFs. We were born on the same day – June 21, the
16 summer solstice. We both have the dual personalities of the Gemini twins and the caring side of
17 the Cancer zodiac sign. We would spend hours and hours in the Clearwater woods together,
18 making forts, devising survival games, climbing to tallest treetops.

19. But when we got into fifth grade, things started to change. I didn't realize it at first.
20 MJ became obsessed with wanting to make money and was always coming up with failed get rich
21 quick schemes. I thought it was just a joke, and I ignored it. Until MJ hit it big. It all started when
22 MJ's dog Ricky unearthed a baby bunny, and instead of eating, it, brought it in the house and gave
23 it to MJ. MJ called me right away, even though it was the middle of the night – about 2:00 a.m.,
24 they knew I'd be awake. I came right over, and we created a nest for the bunny, feeding it, saving
25 it. We spent one week straight with that bunny, and it started growing strong. I thought we'd let it
26 go, back into the wild, but MJ wanted to keep it longer. MJ had a steady stream of kids from school
27 coming to see the baby, and they soon realized, they could make money by charging people. So,
28 MJ charged kids a dollar to see the bunny. Within a few days, MJ had \$75.00!

29. It wasn't enough for them. MJ got greedy, for money and attention. They coaxed
30 Ricky into sniffing out more bunnies, and soon, MJ started a bunny farm, and the bunnies were
31 reproducing like, well, like bunnies. MJ expanded their operation into a backyard bunny farm,
32 incorporated as Bunny Fluff and Friends (BFF!) and was soon making a fortune (for a 10 year
33 old), charging people to come see the bunnies.

34. Seeing MJ profit off the captivity of wild animals was deeply sickening to me, but
35 I kept it to myself. MJ was the richest and most popular kid in school, and I would doom myself
36 if I did or said anything publicly to insult them. We were still BFFs on the outside, but on the
37 inside, I was no BFF of MJ.

38. MJ's bunny farm fizzled as quickly as it had started. One morning, the town of
39 Clearwater woke up, and all the bunnies were gone. They had all escaped the flimsy backyard
40 enclosure. The combination of human negligence and hubris with the ingenuity of animals made

41 it inevitable. Just like in Jurassic Park, nature finds a way to escape. We cannot control nature, and
42 we should never try. Although I was secretly happy about the bunnies escaping, I had nothing to
43 do with their escape. It was pure karma. Nevertheless, MJ accused me of tampering with their
44 enclosure and shunned me publicly. Everyone in school felt sorry for MJ and believed them. I lost
45 all of my friends, but I didn't lose my dignity, and then and there I dedicated my life to saving
46 animals from captivity.

47 8. I began exposing the horrors and abuses of zoos. All these so called animal
48 sanctuaries were just excuses for bored people asserting their dominance over unsuspecting,
49 trusting animals. I demanded accountability, wrote letters to the editor, protested and picketed. But
50 I was never violent. Just because I'm an animal rights activist, people try to pin every animal
51 escape on me. Dogs, cats, snakes, guinea pigs, ferrets, every dumb pet owner who loses their
52 beloved animal pins their negligence on me. I've been arrested eight times – EIGHT TIMES!
53 Suspicion of trespass, breaking and entering, kidnapping, damage to property. But I was never
54 once charged. Not once.

55 9. MJ had many failed animal operations: the petting zoo for rescued alligators that
56 was shut down after MJ auctioned off a baby alligator who ended up escaping and turned up six
57 months later, nearly full-grown, terrorizing children at the splash pad on the hottest day in summer.
58 MJ's short-lived slow loris "sanctuary" was shut down after the Malaysian government threatened
59 to sue the City of Clearwater for allowing MJ to keep animals purchased from illegal poaching
60 operations. But the latest operation – Wisconsin Ostrich Farm and Fun (WOFF) took off, and
61 despite ostrich escapes, it has been going strong for nearly a decade.

62 10. I attribute the success of WOFF to Clearwater's voracious appetite for ostrich
63 burgers, the novelty of an ostrich farm in Wisconsin, and dumb luck. Ostriches have escaped many
64 times. Security footage has shown ostriches picking locks, pecking cameras, and prying open
65 enclosures. I have seen the security footage myself – everyone has, it was all over the Clearwater
66 news.

67 11. There have been at least four escapes I can think of (at least that made the news) in
68 the time since WOFF opened. In one, an ostrich was discovered at the drive through window of
69 the local McDonalds – the sleepy teenager at the window handed the bag out the window without
70 paying attention, and an ostrich snatched up the egg McMuffin and ran away at top speed. Another
71 escaped ostrich likewise sought out breakfast food, waltzing into the Clearwater Denny's and
72 eating a patron's entire order of Moons Over My Hammy® before eating the dining companion's
73 Grand Slamwich®. She left without paying the bill. That is when I'd had enough. These ostriches
74 needed to be free, and I started the organization Freedom For Ostriches Wisconsin (FFOW). The
75 organization's goal was to shut WOFF down through peaceful, legal means, such as distributing
76 educational materials and lobbying the local government. I would also spread the word with my
77 posts on Nudge.

78 12. I remember one time when an ostrich escaped during the day. A group of Canadian
79 tourists were in for a special petting zoo experience with baby ostriches, but they had to cut the
80 baby petting short, because the mother started going crazy when one of the tourists was a little too
81 snuggly with the baby. The mama chased the tourist into the bathroom, and people outside heard
82 a commotion, and MJ ran into the bathroom and appeased the mama with a blueberry scone. I
83 wasn't there, but I learned through general gossip and then weeks later, I received an anonymous

84 letter postmarked from Saskatoon, Saskatchewan. The writer asked me to investigate WOFF
85 because when they were visiting Clearwater, an ostrich unprovoked, escaped the petting area, ran
86 into the restroom, and kicked the patron in the shins. The letter stated the owner ran into the
87 bathroom and offered the tourist \$10,000 on the spot in exchange for their silence.

88 13. On May 19, 2025, I had made myself an early dinner of fried squirrel and kale salad
89 (I only eat animals I kill myself. It's nature's way). I went for a long walk around the neighborhood
90 because I wanted to break in my new pair of Adidas Gazelle shoes – the most popular shoes of the
91 season, and for good reason. They are comfortable and stylish! I had to go all the way to Chicago
92 to get my pair because every shoe store in Clearwater was sold out of the men's size 9/women's
93 size 10 in my colorway.

94 14. I admit, I did walk by WOFF! But I didn't go near. I did what I usually do. I climbed
95 the big oak tree that is about 50 yards from the entrance. It was dusk, and I watched over the
96 ostriches, hoping for their peaceful freedom. From my perch, I could see into their enclosures
97 (which are just fences and open from the top). They were acting agitated and making noises –
98 growls and booms, not happy chirps. I can't believe nobody else complained about them. The night
99 was still and the sounds could have carried a great distance. I was worried. Something was wrong
100 in the air. The ostriches started to act wild! I thought they might be planning an escape, and I didn't
101 want to be anywhere nearby when it happened. So I quietly climbed down the tree and walked
102 home slowly.

103 15. My walk made me sleepy, and I turned into bed early. The weather was perfect. I
104 slept with the windows and doors open. I woke at around 4:30, with the first sounds of the birds. I
105 took advantage of the morning to make breakfast (I usually have to enjoy breakfast food for a
106 midnight snack, so it was a real treat to have it in the morning). I had (free range) eggs sizzling on
107 the griddle and bacon I'd ordered from a guy I found on the Internet who hunts wild boar and
108 butchers the meat.

109 16. Just as I was about to take the breakfast off the griddle, a heard a horrible banging
110 sound! A huge, mad mama ostrich was knocking at my front screen door (the main door was still
111 open from the night before). I figured she must be famished and was going to let her in for
112 breakfast, but then she stepped back and charged, easily breaking the screen door off its hinges.
113 She came straight toward me, kicked me in my right shin and ransacked my house! She went into
114 every room, knocked over a bookshelf with her powerful neck, and tore my closet apart. I sat there
115 helpless and in agony as she kept throwing herself at the basement door. But something distracted
116 her, and she ran out the back screen door, which I had left open to air out some of the smoke from
117 the bacon before the fire alarms went off. I started to get myself off the floor, but then she busted
118 back into the house and kicked me in the other knee! I doubled over, screaming in agony. She ran
119 into the kitchen. There was a huge clanging sound, and I saw her run out the back door again, with
120 my \$30.00 per pound wild boar bacon handing out of her mouth, and inexplicably chased by a
121 dog?! I do not even have a dog.

122 17. I was yelling for help. My left kneecap felt completely shattered and my right leg
123 was hurting so much I couldn't put much weight on it. I don't know how long I was yelling. It felt
124 like a century but it was probably only 3 minutes until my neighbor came over. Seeing the
125 destruction, they thought a tornado had gone through the house. "Just a mad ostrich" I was able
126 to say, before I passed out from the pain.

127 18. I came to in the hospital. My left knee had been dislocated and my right shin was
128 fractured. I was in a full-leg cast for ten weeks, and because I couldn't bear weight on either leg, I
129 was in a wheel chair the entire time. I could not climb trees. I could not go on nature walks. I could
130 not wear my new Adidas Gazelle shoes. It was horrible. I was in so much pain.

131 19. Of course, MJ (and everyone else) now seems to be saying I stole the baby ostrich
132 and let mama go, as they do. I would not do such a reckless thing. MJ tried to have me arrested,
133 but they couldn't arrest me when I was in surgery getting my kneecap sown back into place. And
134 there was never any evidence that I had anything to do with anything. Everyone always tries to pin
135 their stupidity on me, but I didn't do anything.

136 20. I don't know why the baby ostrich was found outside my back door—I didn't even
137 find out about the baby being found out there until my neighbor told me later. But the only obvious
138 answer is that it escaped with its Mama and they were traveling together. Either that, or someone
139 planted it at my house. I never lock the doors, and everyone in Clearwater knows it, and I open the
140 doors a lot for fresh air. Maybe they thought if the baby got in they could pin it on me. I don't have
141 to locks my doors because nobody would dare go near my house to cause harm. Everyone is afraid
142 of the animal spirits that protect me.

143 21. My life will never be the same. My greatest pleasure has always been climbing trees
144 and rest peacefully in the canopy, watching over nature. Because of my knee injury. I may never
145 again be able to climb trees. I have spent hundreds of hours and thousands of dollars on physical
146 therapy, treatments, massage, acupuncture and dry needling, \$25,453 to be exact, and I don't have
147 insurance so I am stuck with the bill. Not being out in nature has caused me to be depressed and
148 withdrawn from life.

149 22. I reviewed Exhibit B. It is the ostrich that attacked me. I also looked at Exhibit C,
150 and I think it gives a fair idea of the layout of the area, though it's not to scale. The anonymous
151 letter I received is Exhibit D. Exhibits E and F are some of the news articles I saw about WOFF
152 that led me to create FFOW. Exhibits G and H are nudge posts I made as a part of my work with
153 FFOW. Of course I didn't actually go set the ostriches free—if I had, there would have been
154 ostriches taking over the town. As for Exhibit J: I have no idea if this is my footprint.

Regan Kazoo
Regan Kazoo

Subscribed and sworn before me
this 29th day of June, 2025.

Andie Bensky
Notary Public, State of Wisconsin
My commission is permanent.

AFFIDAVIT OF REESE GROBBELAAR

Reese Grobbelaar, first being duly sworn, states as follows:

1 1. My name is Reese Grobbelaar. I am an adult resident of the State of Wisconsin,
2 living at 7129 Turnberry Lane, Clearwater, Wisconsin. I was born in South Africa but moved to
3 Wisconsin with my family when I was 15 and have lived here ever since.

4 2. I grew up watching American soap operas. I was so obsessed with them that I tried
5 to speak like my favorite actors, so much so that I lost my South African accent even before I
6 moved to Clearwater.

7 3. I am a staunch vegetarian. When I was a little kid, I would spend all my free time
8 on my grandparent's ranch in South Africa. I loved being on the ranch and spending time with the
9 animals. I treated them all like I would treat pets. My grandparents let me name all the newborn
10 cows. I named my favorite baby cow Wilbur.

11 4. When I was old enough to understand that the animals were killed for meat, I was
12 devastated. One time we went to the ranch for a cookout, and my grandpa proudly announced that
13 today's burgers were courtesy of Wilbur! I started sobbing and refused to eat anything. I was
14 heartbroken and haven't eaten meat since. I knew that the animals were treated well at the ranch,
15 but I couldn't get over the fact that they were being raised for the sole purpose of all eventually
16 ending up like my poor, innocent Wilbur.

17 5. Once we moved to Wisconsin, my family would still spend a few weeks every
18 summer going back to South Africa and staying on the ranch with my grandparents, but I couldn't
19 shake the memory of poor Wilbur. I knew that my grandparents needed the ranch to survive, but I
20 just couldn't bring myself to participate in any of the farm work or to get close to the animals like
21 I would when I was younger.

22 6. My neighborhood in Clearwater is close enough to the ostrich farm that I'll take
23 my kids to visit every now and then. It brings back some happy memories of my childhood in
24 South Africa and of my grandparents, though the gift shop takes away from that feeling a bit—
25 always trying to take more of our money. When we're there, I just try to forget what these birds
26 are being raised for (namely, not just for us to come and look at them). Sometimes my kids ask for
27 a favorite ostrich one was particularly fond of a mama named Penny), and I have to find a way to
28 tell them why that ostrich isn't there anymore without traumatizing them the way my grandpa did
29 to me. Sometimes I just point at a different ostrich and say "I think that's her over there!"

30 7. I work in finance. It's too complicated to explain. When my kids ask, I just tell
31 them I help people with money.

32 8. Once I had a few of my cousins from South Africa come to visit my family. I
33 decided to take them to Birds of a Feather for dinner. Even though I would never eat an ostrich
34 burger, it was a fun time reminiscing about our grandparents' ranch. When it came time to pay, I
35 didn't leave a tip. That's not something I usually do. My view is that tips should only be given
36 when the service goes above and beyond. Regular service, like taking the order and bringing the

37 food, is what I already paid for. Besides, the owner, Blake Deadly, already charges an arm and a
38 leg for the food there.

39 9. Not long after that, I ran into Blake at the grocery store. They gave me a look I
40 didn't quite understand – strange, maybe even a little menacing. I wondered if it had something to
41 do with the fact that I didn't leave a tip, but I can't know for sure what they were thinking. Maybe
42 they think I'm more involved with FFWF than I really am just because of my neighbor, Regan
43 Kazoo. I don't appreciate being caught up in all this drama just by mere association with my
44 neighbors.

45 10. I have an okay relationship with Regan, but I wouldn't say we're close friends or
46 anything. Soon after I moved in, Regan stopped by to ask me for a donation. I of course said no,
47 but it really rubbed me the wrong way. I don't usually give to any causes, and honestly, I didn't
48 feel like parting with the money after all of my moving expenses. What annoyed me more was that
49 they ignored the "No Solicitors" signs I keep posted on my property. I put those signs up for a
50 reason, and I don't like it when people act like they don't apply to them – I don't care whether
51 you're my neighbor or not.

52 11. Setting aside the initial solicitation attempt, we still chat every few days when we
53 see each other out walking or doing yardwork. They'll ask how my kids are doing and will often
54 invite me to Freedom for Ostriches-Wisconsin events and fundraisers. I've heard rumors from
55 people around town that some of the FFWF's members are a bit out there – like tree hugger types.
56 Not really my scene. Besides, I don't know why they keep asking me to come to fundraisers in the
57 first place. Okay there was that one time I popped in at the end of a meeting because I heard there
58 were free snacks. I got a great can koozie for free! It was not my kind of people but I think it—
59 and the fact Regan saw me using the FFWF can koozie made Regan think I was more interested
60 in the cause than I really was. They've been after me ever since, but I've never given them money
61 and never would.

62 12. That said, I did get suckered in to signing up for FFWF's mailing list, really just
63 because I didn't have the heart to tell Regan that I don't mind WOFF. Sure, I'm a vegetarian and
64 love animals, but I don't want to get involved with FFWF's kind of activism. I wasn't a fan of all
65 the news I was reading about WOFF on Nudge, but it wasn't really my "thing" to do anything
66 about it.

67 13. On the morning of May 20th, 2025, I was out walking my dog, Rocket, like I always
68 do. He's purebred border collie and perfectly trained if I do say so myself. I've been taking him to
69 agility classes since he was a puppy. On our early morning walks around the prairie preserve I
70 don't even bother to keep the leash on him. He sticks right by my side like the good boy he is. I
71 rarely run into anyone and I've never had any problems with it until that morning.

72 14. On the same morning, we finished up our walk around 5:00 a.m. and were almost
73 home. That's when Rocket paused and refused to keep walking with me. His nose shot straight up
74 like he caught a scent or something. I tried to get his attention but before I knew it he took off like
75 a, well, rocket. He sprinted past our driveway, out of the neighborhood and up to Regan's front
76 door. I chased after him, but I was too late. Rocket had somehow gotten inside. I have no idea how

77 Rocket would've gotten in if the door wasn't already open. He's not big enough to bust through
78 the screen or anything.

79 15. As I approached the door, I could hear Rocket inside barking his head off. At that
80 point I also heard Regan screaming for help, so I went inside to figure out what in the world was
81 going on. Once I was inside, I noticed large feathers in the entryway and even more scattered
82 throughout the kitchen. I guess they could've been ostrich feathers, but I have no idea – I'm no
83 bird expert. I don't think they could've been baby feathers though, they were too big.

84 16. I found Regan on the floor in the kitchen, screaming in agony while holding onto
85 their legs. The stove was still on, and a frying pan was on the floor half-full with bacon, and there
86 were half-cooked scrambled eggs all over the place. It looked like a hurricane swept through. I
87 assumed it was Rocket that caused the mess, but Regan was sobbing and ranting about an ostrich.
88 I felt bad for Regan and all but honestly, I was just relieved that they weren't blaming Rocket.

89 17. Regan was fighting through tears and said that an ostrich broke through the front
90 door and attacked. I didn't see any ostriches, but I know for a fact that Rocket wouldn't be capable
91 of doing that to someone. He's just a little border collie for crying out loud. Besides, he couldn't
92 have been inside for more than a few seconds because by the time I got there he was already out
93 the back door chasing after something.

94 18. I ran to the back door to try and see where Rocket went and came across a baby
95 ostrich slumped over and hiding under a patio table. I knew it had to belong to the farm nearby, so
96 I quickly googled their phone number and called to let them know where the baby was. I spoke
97 briefly with the owner, Montana Jake. I'm sure they were grateful but we hung up fast so I could
98 go help Regan.

99 19. Once back inside I quickly turned off the stove and tried to help Regan, but it was
100 pretty clear that they needed serious medical attention for their legs. I totally would've taken Regen
101 to the hospital myself, but Rocket was still running loose. I couldn't bear the thought of him getting
102 hit by a car or getting lost. I called an ambulance for Regan instead. Once I got off the phone I
103 assured Regan that help was on the way and ran out of the back door. The baby ostrich was still
104 cowering under the table at that point, but Rocket was nowhere to be seen.

105 20. I tried to follow the sound of Rocket's bark but couldn't keep up. In a panic, I
106 checked our neighborhood's Nudge page, which is a very reliable source of pet escape-related
107 information, among other things (I'll never understand why people get so worked up about people
108 who don't clean up after their dogs—that's where it belongs!). Thankfully someone had posted
109 that they saw Rocket running towards the direction of the local park. I hurried there as quickly as
110 I could. I found him sniffing around the jungle gym where I was able to leash him up for our walk
111 home. As we got closer to home I could hear the ambulance arrive at Regan's house.

112 21. Like I said, Rocket is a perfect dog. I have no clue what got into him to make him
113 run into Regan's house like that. I guess it was kind of lucky for Regan though, because I'm not
114 sure how long they would've been laying there in agony if I wasn't there to call the ambulance
115 and save the day.

116 22. I never heard anything from MJ or anyone about what happened with that baby
117 ostrich I called in. I hope it found its mama. If I were MJ and letting my ostriches run loose, I'd be
118 giving people finder's fees, but I guess that's just me. It just makes me think MJ doesn't really
119 care and just wants us all chasing down their animals for nothing.

120 23. I do wear a men's size 9/women's size 10. I am not sure why that matters. Adidas
121 cost more than I'd ever spend on shoes.

122 24. I reviewed Exhibit A. I didn't take it and it isn't where I found it at Regan's house,
123 but it seems to be a picture of the baby ostrich I found. Exhibit C seems like a fair map of the area.
124 The park that I found Rocket in isn't on the map—it's through the woods to the north/northwest.
125 Exhibits E and F are Nudge posts I saw about WOFF. Exhibit I is the neighborhood Nudge post I
126 found that helped me know where to find Rocket.

Reese Grobbelaar
Reese Grobbelaar

Signed and sworn to before me
This 15th day of July, 2025.

Mike Schulz
Notary Public, State of Wisconsin
My commission is permanent.

AFFIDAVIT OF CASSIDY O'WARY

Cassidy O'Wary, being first duly sworn, states as follows:

1 1. I am Cassidy O'Wary. I am an adult resident of the State of Wisconsin, living at
2 3448 Bennett Dr., Clearwater, Wisconsin.

3 2. I'm 39 years old and I grew up in Milwaukee, but I moved to Clearwater for
4 business school in 2004. Except for a five-year hiatus, where I lived in New York, I have called
5 Clearwater my home since 2004. Everyone calls me "Cass."

6 3. I tried to have my lawyer quash this subpoena, but they said it was impossible. So,
7 I'm here against my will if you ask me.

8 4. I attended business school at Clearwater University, where I received my B.A. in
9 Business. While at Clearwater University, I was the Vice President of the Corporate Finance Club
10 and I was the Treasurer of our chapter of *Beta Alpha Psi*. After spending five years as a financial
11 analyst for a Wall Street firm, I decided to return to school and get my Master of Business
12 Administration. Of course, I went to Clearwater University for my MBA.

13 5. After receiving my MBA, I took three months off to backpack through Australia
14 and New Zealand. I know Europe is the big "thing" for backpacking, but I always liked the idea
15 of seeing what was waiting in the "Land Down Under."

16 6. While I was in Australia, I saw emus for the first time, and I instantly became
17 enthralled with them. Their personalities are so unique and have you ever heard of the Great Emu
18 War? Dominic Serventy, an Australian ornithologist, essentially said that the emus outmaneuvered
19 the Australian government in 1932. How cool is that?

20 7. After returning from my backpacking trip, I decided I wanted to see what I could
21 do to work with emus and other large, flightless birds. It just so happened that after a year or two,
22 a business manager position opened at Wisconsin Ostrich Farm and Fun, Inc. ("WOFF!"). I had
23 my application for the position submitted within minutes.

24 8. Within a week, Montana Jake reached out about an interview. We met and hit it off
25 right away and they offered me the position on the spot. I think they were impressed with my
26 numerous stories about the Great Emu War and my time in Australia.

27 9. For the first few years that I worked at WOFF!, Montana and their family took great
28 care of the ostriches. The family ensured that all of the ostriches' needs were met, and I helped
29 where I could. However, things began to change as Rae and Jacob got older. More and more,
30 Montana was away from WOFF! to attend ball games or matches or recitals or whatever.

31 10. I spoke with Montana and assured them that it's not a failure to ask for more help
32 and with the success of the business, we could hire some well-qualified individuals to help with
33 the care for the ostriches. Initially, Montana seemed receptive to the idea, and I told them that I
34 would begin looking for a candidate. Without telling me, they hired a bunch of high schoolers and

35 recent high school graduates to care for the ostriches. With those recent hires, there was no way
36 we could hire the type of qualified candidate I had in mind.

37 11. And, even though we had periodic check-ins from Camille Rhea, who was like an
38 ostrich consultant, I wouldn't call them very exhaustive. It was more about what (expensive!)
39 supplements the ostriches should take than what I'd think of as ostrich whispering. Plus, Camille
40 can't really get over their own big head to see what's right in front of them. They would just
41 constantly talk about being in Mauritania and how they know SO much about large, flightless
42 birds.

43 12. We had a couple incidents with the DNR where they said we failed to meet
44 licensing requirements, so I made it my mission to improve security. The first incident was in
45 2021, when an ostrich escaped and was found in a McDonald's drive-thru, snagging breakfast
46 food. It was the talk of the town—so embarrassing. I had to make a corrective action plan and I
47 studied up on ways to make foolproof enclosures so ostriches couldn't escape from the inside. I
48 began reaching out to various experts to see if they had suggestions—including Camille Rhea,
49 despite how much I detest speaking with them. Camille's suggestions were focused on giving them
50 high quality food and giving them plenty of room to roam, which we were already doing so that
51 helped allay some of my concerns. They didn't seem like they knew a lot about how to help
52 ostriches escape from within: they seemed more focused on making sure the ostriches didn't *want*
53 to escape. Based on my research, I came up with and implemented a plan to reinforce the
54 enclosures with relatively little cost, which satisfied the DNR.

55 13. Unfortunately, then we had a second citation from the DNR a few years later. In
56 2023, one of our ostriches was found at a local Denny's. I led the investigation into the incident,
57 and after interviewing the staff, I found holes in our system: while I couldn't rule out an ostrich
58 escaping on its own, it seemed more likely that one of the high school workers left the enclosure
59 open. I was able to convince MJ to spend some money on security cameras by explaining that if
60 we keep having incidents like this our insurance costs will skyrocket. I put those in the corrective
61 action plan, along with implementing a checklist for the closer to complete. On top of that, we said
62 we'd stop feeding the ostriches breakfast food so they wouldn't have as much of a taste for it. The
63 DNR approved that plan, too.

64 14. Yes, I am aware that Regan is talking about some news articles. I acknowledge
65 those articles existed but I can tell you I never talked to the media. The bad press really stopped
66 once we improved security.

67 15. However, in mid-April this year when I arrived at my office on the farm, I noticed
68 a baby ostrich crying on my floor. The mother ostrich strained against the fence of her enclosure
69 looking for the baby.

70 16. I returned the baby to its enclosure and messaged Montana. It told them that it was
71 unacceptable and that we needed to review the footage from the previous nights to see what
72 happened. It was a relief to find that Montana was equally, if not more, upset about this and
73 immediately came to the farm to review the footage with me.

74 17. When we reviewed the footage, we found that the closing crew accidentally left the
75 gate to the hatchling enclosure open. In the middle of the night, one of the hatchlings awoke and
76 made its way to my office. Seemingly, it couldn't find its way out and began screeching, which it
77 continued to do until I arrived.

78 18. The checklist was supposed to stop this from happening. I didn't think we could
79 handle the cost of another violation from the DNR so I didn't report it: I handled it internally. At
80 the time, I retrieved the last month's checklists, including the one from the day before, and noticed
81 that the check box to "lock enclosure" was checked off. Montana said it was probably just a
82 mistake, but I reviewed more of the security footage and noticed at least five times in the last
83 month where "lock enclosure" was crossed off, but the footage showed that the crew failed to lock
84 the door. I told Montana that this is what we get for hiring high school staff that probably don't
85 care about making sure the work is done correctly. They dismissed my concerns and said they
86 would talk to them and have Camille Rhea come back for another training to impress upon them
87 the importance of locking the enclosures. I don't know why Camille would have to do that: I was
88 the one who knew everything about the enclosures.

89 19. For a time, Montana took it upon themselves to complete the closing checklist every
90 night. But after a few weeks, they had their other obligations, and they said that they would "watch
91 the cameras to make sure the closers locked the gates."

92 20. This made no sense to me. I told Montana exactly why we needed to be more
93 faithful in the care for the ostriches. A baby ostrich had made its way to my office for feather's
94 sake! I had created the checklist, and Montana had agreed to complete the tasks. I had even
95 suggested self-closing gate hinges and a double lock; that way, if one failed, there would perhaps
96 be a failsafe. But no, that would require redoing parts of the fence, and that was, apparently, too
97 much cost. This wasn't true; I knew because I was in charge of the books. Short of me staying to
98 complete it, which was outside my scope of work, I don't know what else I could do. I felt bad
99 about it; I wanted to make sure that the ostriches had the best care, but what was I to do?

100 21. I couldn't agree with Montana's decision. It was their choice to open the farm and
101 take on the responsibility of these beautiful animals, and it was their responsibility to ensure they
102 cared for them adequately. I told Montana as much and we had a...tiff. We decided to go separate
103 ways, and I signed a non-disclosure agreement that I intended to keep, but I was called as a witness
104 and my lawyer said I needed to show up.

105 22. But with the way Montana was handling the business, it doesn't surprise me that a
106 baby ostrich would get out again. I even told them that it would happen if they didn't listen to me.
107 And Montana got mad and said that I was "trying to take over the business." I guess they didn't
108 realize what a business manager does.

109 23. I heard that Montana didn't have working video cameras at the time of the incident.
110 While just watching the videos wasn't enough based on prior experience, you can't count on "just
111 watching the surveillance video" as your main security and then take no extra steps when the
112 videos are down: either they weren't actually watching the videos—so were taking no steps for
113 security—or when they watched them they noticed they were down and took no extra steps to

114 make sure the place was secure. Either option is inadequate. And by the way, if Montana says the
115 video cameras were vandalized, where's the video from them right before they went offline? I
116 have follow-up questions.

117 24. Even with Montana's questionable standards of procedure, it wouldn't surprise me
118 if Regan Kazoo orchestrated this whole thing: it's definitely possible. If you were to ask me, I
119 would say they are one feather shy of a full wing. A few years ago, we put on a benefit to raise
120 money for the ostriches, and Regan showed up wearing what was supposed to be bloody cut wings
121 saying that we terrorized the ostriches. The police were called and Regan was removed from the
122 property.

123 25. I also received emails over the years from Regan about how I was helping a sick
124 individual torture animals. I filed the emails away without further thought--Regan was just another
125 overzealous advocate who would eventually stop, right? When I left WOFF!, I didn't get a chance
126 to get a backup of those emails, so I have no idea if they are still available.

127 26. Honestly, it wouldn't surprise me if Regan went on to the WOFF! property and
128 kidnapped the hatchling. They seemed to be ramping up their efforts to take WOFF! down.
129 Recently, they had been posting a lot on Nudge about how WOFF! was failing to properly care for
130 the ostriches. In the comments, they said things about wanting to free the ostriches. I didn't take
131 that very seriously, but maybe I had been wrong. I didn't think that WOFF! was neglecting the
132 ostrich, but I definitely think they could have been doing more for them.

133 27. In my opinion, based on all of my training, experience, skills and knowledge
134 regarding safety and security protocol for keeping ostriches, I think it's much more likely that the
135 mama and baby ostrich escaped on their own. It is my opinion that had Montana taken steps to
136 install self-closing hinges and double locks since they knew the ostriches had recently escaped the
137 existing locks, had they completed the closing checklist knowing their workers weren't doing it
138 (or held their workers accountable for their failures or hired better workers), and/or had they used
139 the surveillance videos properly, the mama and baby ostrich wouldn't have escaped, or if they had,
140 they would have been caught before they hurt anyone. It sounds like they're not strictly enforcing
141 the "no breakfast food" rule, and the ostriches had a taste for it. I think they smelled it at Regan's
142 house and broke out to try to get a taste. But regardless, they shouldn't have gotten out.

143 28. Exhibits A and B are of the baby and mama ostrich, respectively. I recognize them.
144 Exhibit C is a map that fairly depicts the layout of the area surrounding WOFF, in my experience.
145 I have never seen Exhibit D. I have seen Exhibits E and F--those are some of the news articles I
146 was talking about. Exhibits G and H are some of the Nudge posts I found from Regan. Exhibit K
147 is a blank copy of the closing checklist I created while employed by WOFF. Exhibit L is a fair,
148 accurate, and current copy of my *Curriculum Vitae*.

Cassidy O'Wary
Cassidy O'Wary

Subscribed and sworn to before me
this 18th day of August, 2025.

Bryant Ray
Notary Public, Clearwater County, WI
My Commission is permanent.

AFFIDAVIT OF MONTANA JAKE

Montana Jake, first being duly sworn, states as follows:

1 1. My name is Montana Jake. I'm 43 years old and I've lived in Clearwater my entire
2 life. My parents owned a small home on just shy of an acre of land on the edge of town, right by
3 Clearwater County Park. If you've ever been to Clearwater County Park, you know the pine tree
4 forest—the “green loop” hike. My parents' land abutted that forest. So, as a kid, it felt like the
5 entire pine forest was my yard. And unsurprisingly, that's where I spent most of my time as a kid.

6 2. To say that I've always loved animals is an understatement. People often confuse
7 me and most of them, I've learned, can't be trusted. Animals make much more sense to me.
8 They're more loyal, too.

9 3. I know that at this point I'm kind of known for my interests in more obscure animals
10 that are non-native to Wisconsin, but I've always had a fascination with and passion for tending to
11 all animals, big and small. I remember when I was real young—mid-elementary school—I'd spend
12 as much of my free time as possible going to the woods to try and spot the woodland voles coming
13 out of their underground tunnels. I called it “Vole Patrol.”

14 4. I didn't have many friends as a kid, but I didn't really mind. Though it's hard to
15 imagine it now, Regan Kazoo was by far my best friend. Regan lived a few houses down and
16 would come over after school and over the weekend to go play in the woods or build forts together.

17 5. Regan also loved animals, but in a different—more obsessed—kind of way. Regan
18 always seemed to view animals as completely helpless creatures that needed Regan to save. As I
19 would tell Regan, that doesn't give animals nearly enough credit. Caring for animals is about
20 mutual respect, not superiority.

21 6. Regan also liked to brag about knowing more about animals than anyone else. One
22 time we found a porcupine in the woods over the weekend, and within a week Regan was rattling
23 off every possible fact one could learn about the porcupine. When we went back to school, Regan
24 asked everyone what they knew about porcupines. I said we should offer to bring other kids with
25 us to the woods to try and find the porcupine again, but Regan said we should leave the porcupine
26 alone. It was kind of annoying.

27 7. My friendship with Regan ended in fifth grade after Regan freaked out about my
28 bunny business, which by the way was my first of many successful animal businesses. My family's
29 dog Ricky, a sharp and sweet black and tan hound dog, found a baby bunny and brought it into the
30 house to me late one night. Ricky knew I loved animals and would at times help point me to them,
31 but this was the first time Ricky brought an animal back to me. Regan came over in the middle of
32 the night and we made a little home for the baby bunny in a cardboard box that we kept away from
33 Ricky. I tended to the baby bunny and Regan would come over to check on it. Regan seemed
34 irritated when I started telling other kids at school about the bunny. When classmates asked to
35 come see it, I said sure, for 5 bucks. Honestly, I was surprised how many people took me up on it
36 (it's not that hard to find rabbits in Wisconsin). But they did, and that made Regan really mad.

37 8. That was right at the end of our last year of elementary school. That baby bunny
38 survived (I was really proud of myself), so when Ricky brought me a few more over the summer,
39 I tended to those bunnies, too. Regan told me I was being mean—that I should let them back out

40 into the wild. But I gave those bunnies a great life. I had an enclosure set up in the backyard where
41 they could hop around and eat. And kids would pay me to come see the bunnies. It was awesome.
42 I built the fence for the enclosure myself, so you can imagine my surprise when one morning the
43 bunnies were gone. I knew it was Regan. Regan would not shut up about how the bunnies should
44 be let free. Regan denied it (and still denies it), but there was no doubt in my mind. I told Regan I
45 didn't want to be friends anymore. And, since then, Regan has made it their personal mission to
46 try and destroy everything I do. This case is no exception.

47 9. Since then, I've cared for a wide variety of both local and foreign animals both as
48 a kid and now, as both my passion and way to make a living. If I can give them a good, happy
49 home—what's the problem? Plus, I've given everyone in Clearwater the opportunity to safely see
50 and interact with animals that they'd otherwise likely never even encounter. Ever heard of a loris?
51 I bet you'd recognize them but haven't seen one. Well, for a time, the people of Clearwater got to
52 see them! I know you've heard of alligators, but have you seen adorable baby 'gators?

53 10. I'm not saying my wildlife sanctuary experiences have been perfect—animals are
54 far smarter and more capable than most people give them credit for—but no one's ever been in
55 any serious danger. And the people of Clearwater have loved it. If you've asked around or searched
56 VacationRecommender for top family friendly activities in Clearwater at any point over the years,
57 my sanctuary experiences have been consistently top recommended activities.

58 11. But by far my greatest success to date has been the business I've now had running
59 for 10 years, WOFF!, short for Wisconsin Ostrich Farm and Fun! We are known for being one of
60 the most popular Ostrich farm experiences in the Country—not just in Clearwater, not just in
61 Wisconsin, but in the entire *Country*.

62 12. I became interested in opening a large bird farm and sanctuary experience following
63 a trip to Australia, where I was able to see cassowaries. Large, bright-colored, birds that basically
64 look like dinosaurs. Don't believe me? Look them up. Anyway, I was fascinated by the cassowary,
65 but they are also quite dangerous—they can kill people. And I take safety the safety of both our
66 customers and our birds very seriously.

67 13. So, returning from Australia to Wisconsin those many years ago, I started
68 conducting more research into other large flightless birds and quickly became enamored with the
69 ostrich. Ostriches are actually larger and can run faster and kick harder than cassowaries, but they
70 do not have the same sharp claws that cassowaries have and—more importantly—do not have the
71 same aggressive temperament of the cassowary. I also considered emus, but didn't find them as
72 compelling. I mean, did you know that ostriches can reach top speeds running of over 40 miles per
73 hour?

74 14. I operate WOFF! primarily with my partner, Jo, and our two teenage children, Rae
75 and Jacob, when they're not in school. I've also hired a number of other high school students and
76 local workers seasonally, as needed, over the years. We also used to have a business manager but
77 do not anymore.

78 15. As for the family farm fun part of the business, WOFF! offers our guests the chance
79 to see our flock of currently 15 (it ranges from 12-20 at any given point) ostriches running happily
80 across our wide acreage. Guests can view our whole flock through either the path that walks around

81 the main enclosure or they can go on one of our Ostrich Adventures, which is a van tour through
82 the enclosure. We also have a petting zoo where guests can pet and get a photo with an ostrich.
83 Our petting zoo also features goats and rabbits, as well as a large sandbox for young kids.

84 16. WOFF! is also a fully functioning, top-quality, organic, free-range farm for ostrich
85 eggs and meat. Ostrich eggs are of course huge (also delicious), and ostrich meat is the tastiest,
86 healthiest meat you'll ever try. It's lean, low in fat, high in protein, and even higher in flavor. It's
87 a great source of iron and vitamin B12. Our ostrich burger—which we sell in our cafeteria (called
88 the Long Neck Café) is legendary: WOFF's Ostrich Burger Patty, Clearwater Cucumber fried
89 pickles, Clearwater Creamery 3-Year Aged Cheddar, all topped off with a WOFF's Ostrich Egg.

90 17. WOFF! became so successful so quickly—in just a matter of a few years—that
91 about five years ago, I decided to hire a business manager. Jo, Jacob, Rae, and I were all doing a
92 great job of maintaining the farm, but I knew I'd need to hire additional workers and I thought it
93 would be best to have someone responsible for overseeing them and the business operations.

94 18. Cassidy O'Wary applied and was the obvious choice, given their business
95 background and passion for large birds of all varieties. Cass was hardworking and clearly cared
96 about the birds. Cass and I didn't always see eye to eye. Surprisingly, given Cass' MBA, Cass
97 would sometimes lose sight of the fact that WOFF! is a business (i.e. that it operates to make
98 money). Maybe it was more that Cass just always wanted the Cadillac version of everything,
99 whether for our birds or Cass themselves, and that's just not always realistic.

100 19. Cass encouraged me to get cameras for WOFF!, which we installed around the farm
101 and have named HonkTV. This was a good way both to make sure workers weren't getting up to
102 any funny business and also to make sure the birds were safe and healthy. We have HonkTV
103 cameras at each of the three gates. The cameras wirelessly transmit the footage back to a central
104 hub from which we can livestream or download the footage.

105 20. Cass also created a closing checklist to help make sure we were keeping everything
106 in order and safe. We worked hard to follow each step at the end of every day.

107 21. As is true of most major farm operations, neighbors will occasionally complain and
108 animals will occasionally escape. That's just part of doing business. These are live, large, animals.
109 It's just completely unrealistic to say there will never be any issues. Anyone who suggests
110 otherwise is delusional. We had some issues with the DNR, and yes, I'm aware of the news articles
111 Regan is talking about, but I don't remember all the details: I left all that to Cass. I never said
112 anything to any reporter.

113 22. The key is to just make sure you're doing everything you can. And we pride
114 ourselves at WOFF! of taking great care of both the wellbeing of our big birds and the safety of
115 our guests. In addition to hiring Cass, we also retained Camille Rhea's firm. They helped us make
116 sure our enclosures worked well for both our ostriches and visitors. They also helped provide
117 further training to myself, my family, and our other staff—no matter how much you think you
118 know about ostriches, there is always more to learn!

119 23. We train all of our ostriches from the time they are chicks to be friendly and docile
120 with people. We use positive reinforcement, mostly in the form of treats. I'm proud to say that
121 even though ostriches as a species can at times become aggressive if confronted, in 30 years of

122 operation we've never before had an instance of our birds becoming violent with our guests. We've
123 also never had any accusations of our small handful of ostriches who have escaped over the years
124 harming anyone before we find them and bring them back to the farm.

125 24. I'm well aware that Regan Kazoo has for years been telling everyone who will
126 listen that I paid off a nice family that visited from Saskatoon to hush up the father in the family
127 getting kicked by our Ostrich, Stretch, in 2016. That's a bald-faced lie. Stretch—who is still alive
128 and thriving, by the way—is a sweetheart.

129 25. And yes, Regan did send me a letter that Regan claimed was from someone
130 Saskatoon. Bogus. The anonymous "Saskatoon" writer is Regan! I believe wholeheartedly that
131 Regan made that letter up as further support for Regan's lie. I had and have no reason to believe
132 anything in that letter.

133 26. Regan seems to take very much an ends-justifies-the-means approach to the stories
134 they tell. They have been against WOFF! since the day it opened and think it's totally fine to make
135 up lies. I've heard from countless Clearwater folks that Regan would proudly brag about wanting
136 to shut us down. I'm tired of it and frankly surprised that it took this long for a break-in to happen.

137 27. Well, that last part changed this year. May 19 was a fairly normal day on the farm,
138 other than a minor hiccup with Chompers. It was right before the start of our season when school
139 ends and parents are looking for some family fun activities. We're open Memorial Day to Labor
140 Day, 9-4, 7 days a week (closed only for the Fourth of July).

141 28. Our main enclosure that spans the acreage where the ostriches roam is secured via
142 its own northern and southern gates, which are kept closed, of course, and also locked in the
143 evenings. We then have a separate smaller enclosure that is not for public viewing where we keep
144 the young hatchlings, which has its own gate and lock and is to the west of the northern gate of the
145 main enclosure.

146 29. HonkTV worked great, until it didn't. . . On May 19 of all days, our oldest ostrich—
147 named Chompers because of his love of chomping things—managed to somehow break out of the
148 gate for a short period of time. I didn't realize until after the break-in that during his brief escape,
149 Chompers must have chewed through the HonkTV hub cord outside the office. You can imagine
150 how frustrated I was when I went to watch the footage of what happened and there was none!

151 30. I personally completed the Cass closing checklist steps at the end of the day on May
152 19. I remember in doing the closing steps seeing that the camera lights were still illuminated, so it
153 didn't even occur to me that perhaps the hub wasn't active.

154 31. I awoke with the sunrise the morning of May 20, as I do every morning, got up to
155 go feed the birds, and discovered that every single gate had been busted open. Not only that, it
156 looked like someone had taken a hammer to each of the security cameras. I ran back into the house
157 and got Rae and Jacob out of bed and told them to come help me before they went to school. I told
158 them to look around.

159 32. I was trying to count all the birds when I heard Rae yell, "Hey, come see!" I went
160 over and saw weird footprints in the mud path between the northern gate and the hatchling
161 enclosure. I took some pictures of them—I've seen the TV shows. I know that prints can be key

162 evidence! I told Rae and Jacob to avoid stepping on them and to go back inside and tell Jo to call
163 the cops.

164 33. I then got back to checking for the ostriches and discovered, to my horror, that our
165 ostrich Mamma (we call her Mamma because she's had a number of babies over the years), was
166 missing.

167 34. Mamma is one of our petting zoo ostriches. She's very patient with the customers,
168 and for an extra \$5, guests can hand feed her one of her favorite snacks: a French toast stick.
169 Mamma also likes pancakes and donuts, but French toast sticks are her favorite. We've been trying
170 to cut down on breakfast food due to an issue we had with the DNR, but we let her have a treat
171 every now and then.

172 35. I went back to the house. Jo had already called the police and as we were waiting
173 for them to arrive, my phone rang and it was Blake Deadly. To my incredible relief, Blake had
174 found Mamma. And wouldn't you know, Mamma was at Clearwater County Park—right by where
175 I grew up. I told Jo, Rae, and Jacob to call off the police while I took the truck to go get Mamma.
176 (I really didn't want the DNR getting wind of this one—last time my insurance agent said if we
177 had another violation my insurance rates would skyrocket! Now I wish we hadn't called them
178 off.)

179 36. Mamma definitely seemed startled and shook up, and so I was grateful to be able
180 to take her home. But Mamma didn't calm down much when she saw me or when we got back to
181 the farm. It wasn't until I put Mamma back into the enclosure and she wouldn't stop honking that
182 I realized that one of her babies, Sprout, was also missing. Sprout was old enough to be in the main
183 enclosure but still not fully grown. Mamma was clearly distraught that Sprout was gone. It was
184 terrible to witness.

185 37. The minute I saw the gates busted open and Mamma gone, there was no doubt in
186 my mind who was responsible for this. Regan—it's so obvious. And the idea that Mamma
187 somehow broke into Regan's house is just ludicrous. Now, I'm not denying that a mother ostrich
188 isn't protective of her young. But for Regan to suggest that they did not break into my property
189 and yet somehow ended up getting attacked by my ostrich is a pretty tall tale, even for Regan.

190 38. I was simultaneously relieved and furious when I got a call from Reese Grobbelaar,
191 telling me that they saw a baby ostrich slumped outside. I was so thankful that little Sprout had
192 been located but beyond angry that Sprout had to endure such distress. I was so mad that I tried to
193 find a lawyer who specializes in bird law to discuss filing a lawsuit against Regan for damages for
194 pain and suffering for little Sprout. While I still don't know that I've been able to find a lawyer
195 who really knows the area all that well, the lawyers I did talk to said that they didn't believe I could
196 likely bring that type of claim.

197 39. Cass had stopped working as our business manager just about two weeks before
198 this incident happened. In April, one of our short-term workers who was closing for the night left
199 the hatching gate—that separates it from the main ostrich area—unlocked. No hatchlings were
200 hurt, but Cass and I had both agreed we should take additional precautions. For Cass, that
201 apparently meant no one other than myself should be able to close up for the night. For me, it was
202 more than adequate to check HonkTV before I went to bed. I didn't think that was that big of a

203 disagreement, but it was enough to make Cass want to part ways from WOFF!. We reached a non-
204 disclosure agreement since we both agreed WOFF! couldn't take more bad press. I think Cass is a
205 pretty honest person and only wants the best for WOFF!, I think we just see things differently. I
206 purged the email account and message profile for Cass when they left: there was no reason to keep
207 it, and I just had all their incoming emails forwarded to me for handling.

208 40. If Cass ever wanted to come back, we'd love to have Cass back as business
209 manager. Even with all Regan's efforts to destroy us, WOFF! continues to thrive. If you're ever
210 looking for a fun time for the whole family, come check us out!

211 41. Exhibit A is a picture of the sweet baby ostrich that Regan took. Exhibit B is a
212 picture of Mamma, the ostrich. Exhibit C is a map I made of the area, with the park to the north of
213 the woods on the left. I think Exhibit D is bologna and written by Regan. Exhibits E and F...I've
214 seen...but what are you gonna do? It's a part of the business. Exhibits G and H I haven't seen
215 before but they're concerning. Could it be any more obvious that Regan planned this all out ahead
216 of time? Exhibit J is the footprint I took a picture of on May 20th, and it also shows that it matches
217 with the bottom of an Adidas Gazelle shoe. I made this exhibit. Exhibit K is the closing checklist
218 we used that Cass made.

Montana Jake
Montana Jake

Subscribed and sworn to before me
this 27th day of July, 2025.

Hannah Jurss
Notary Public, Clearwater County, WI
My Commission is permanent.

AFFIDAVIT OF BLAKE DEADLY

Blake Deadly, first being duly sworn, states as follows:

1 1. My name is Blake Deadly. I am a lifelong proud resident of Clearwater,
2 Wisconsin.

3 2. I am a highly successful self-trained chef. I own and operate "Birds of a Feather,"
4 an award-winning restaurant in Clearwater. My best-selling meal item on the menu is the ostrich
5 burger — with meat supplied by WOFF! I upgraded the dish by adding "Gray Diamond"
6 mushrooms grown by Morgan Fairchildren. You know, the young successful entrepreneur who
7 was a key witness in that big trial two years ago involving the death of that kid Flynn Forrester. I
8 don't know what Morgan Fairchildren's secret is to give those Gray Diamond mushrooms that
9 special "funk," but it makes all the difference. It totally slaps. My putting the ostrich burger
10 together with the gourmet funky mushrooms won me a James Beard Award for "Best Chef: Great
11 Lakes." I am kind of a big deal. Some say when it comes to cooking, I am goated with the sauce.

12 3. I am WOFF!'s best customer. It is a mutually beneficial relationship. I don't know
13 where I would get enough ostrich meat for my burgers if WOFF! ever went out of business.

14 4. I witnessed the loose ostrich running around the city on the morning of Tuesday,
15 May 20. It was 5:30 in the morning and I was walking when I witnessed the mama ostrich running
16 around. The mama ostrich was preoccupied and appeared to be searching for something, but I
17 didn't see any other animals nearby. I approached the mama ostrich, petted her head, and gave her
18 some French toast sticks. I witnessed the mama ostrich being gentle, albeit distracted. I was in the
19 park near the north end of town. I knew Montana Jake's phone number and called them. I stuck
20 around to keep an eye out until Jake retrieved the mama ostrich and brought her back to the farm. I
21 didn't see any other animals at that time, but it was just a few minutes.

22 5. It was about 5:30 when I saw the mama ostrich in the park. I know this because
23 after Montana Jake left, when I was getting ready to go home, a dog almost took me out. I checked
24 my watch to see what time it was, because there's an unleashed border collie who is a regular
25 nuisance and a safety hazard in the park, and I try to avoid the park during times when I'd usually
26 encounter that dog. I've never seen its owner and I don't know who it is. When I checked my
27 watch, I realized it was later than I'd usually see that dog (it was around 5:40—usually I'd see that
28 dog earlier than that). Since I think the whole ostrich thing took about 10 minutes, that's why I
29 think I first saw the mama ostrich at about 5:30.

30 6. I should back up a little. I have a major catering contract for that big children's ice
31 sculpture summer camp on the edge of town. It's the one run by Coco, the world famous ice
32 sculpting mega-genius. Children are given ice sculpting lessons. I hear there are some real child
33 prodigies at that camp. Sort of like ice sculpting Mozarts. Come to think of it, Coco was a witness
34 in a recent trial as well. Clearwater can be a small town sometimes. Anyway, the ice sculpting
35 camp is a sleep away camp where the campers live there. I provide all three meals a day plus an
36 afternoon snack. For one of my breakfast dishes I have been trying to "reimagine" the French
37 toast stick. I was stressed and getting nowhere. Often when that happens I go into goblin mode,
38 but other times when I am trying to invent a new dish I take some of the dish and go for a long
39 walk and think really hard — like I'm in grindset.

40 7. The day before this all happened, I had a bag of French toast sticks in my pocket
41 when I was visiting WOFF to pick up some product, and I snuck some to an ostrich who seemed
42 to be following me from the enclosure. I could tell the ostrich really liked them. Anyway, the
43 morning of May 20th, I had a new batch of French toast sticks in my pocket and had been snacking
44 on them, thinking, and walking for about 30 minutes when I saw the mama ostrich. I gave the
45 mama ostrich some French toast sticks to calm her down, already knowing ostriches liked them. It
46 worked pretty well: she took them very gently. Well, for an ostrich.

47 8. By the way, after Jake took the mama ostrich back a thunderbolt of an idea hit
48 me. Remember, I was trying to reimagine the French toast stick. I realized I had been putting the
49 French toast sticks into the ostrich. Why not put cooked ostrich into the French toast sticks for the
50 kids at the ice sculpting camp? It would be totally bussin. Genius, I know! What child wouldn't
51 love that? Coco loved it! I think I could serve that at my restaurant and win another James Beard
52 Award.

53 9. I actually went to school with both Regan Kazoo and Jake — from grade school
54 through high school. I have never told anyone this before, but when I was in fifth grade I witnessed
55 Kazoo break into Jake's outdoor bunny sanctuary in Jake's back yard and release all of the bunnies
56 into the wild. I was going to visit the bunny sanctuary because I had a favorite bunny there who I
57 nicknamed "Doug." I wanted to visit Doug the rabbit. As I was approaching the enclosure I saw
58 Kazoo opening the gate to the sanctuary and start herding the bunnies out of the enclosure. I hid
59 and I know nobody saw me. I never came forward because I was scared of Kazoo back then. Their
60 behavior was always kind of erratic. It still is in my opinion. Everyone was blaming Kazoo and
61 thought they did it anyway, so I did not get involved. After a while I kind of moved on because I
62 assumed the statute of limitations for releasing rabbits ran. But I will say that when I stumbled
63 upon the mama ostrich that morning and saw her running free I immediately thought this was a
64 "Doug the rabbit" moment.

65 10. I knew the relationship between Jake and Cassidy O'Wary had been strained for a
66 while. I don't know why. However, I recently was visiting the offices of WOFF! because I wanted
67 to modify some of my orders and I overheard a huge argument between Jake and O'Wary in Jake's
68 office. O'Wary yelled, "I am mad! You can't do anything to me. I know all about your business. I
69 know where all the bodies are buried!" The defendant responded "What bodies? I raise
70 ostriches." O'Wary replied, "It's a figure of speech, you moron! You'll rue the day you fired
71 me!" The defendant answered, "I will 'what' the day?" O'Wary yelled back, "You will rue it. You
72 will rue it, I say!" And then O'Wary stormed out of Jake's office, past me and out the door. I
73 suspected O'Wary had been fired or was going to be fired. There was fury in the O'Wary's
74 eyes. Anything was possible. I entered Jake's office and they said to me, "I'm full of
75 'rue'!?" Who talks like that? I'm so confused."

76 11. I know Reese Grobbelaar. They talk a good game, but you want to know what
77 Reese Grobbelaar is like? I saw Reese at the grocery store one week before the ostrich
78 incident. That would have been Tuesday, May 13. I was walking into the grocery store and there
79 was a table set outside raising money for charity. It was a charity to raise money to find homes
80 for cute fuzzy animals. The deal was you were supposed to put a dollar or two in the jar and then
81 take a piece of candy out of a bucket as a "thank you" for your donation. Well, anyway, Reese

82 was walking out and pretended to put a five dollar bill in the jar — they had it in their hand and
83 put their hand kind of in the jar but then pulled it back with the money still in their hand. The two
84 people working at the table thanked Reese, and then Reese took a piece of candy. That was stone
85 cold. No cap.

86 12. The plaintiff had a long history of protesting things. I remember one time in high
87 school Kazoo wanted to protest animal cruelty and the serving of meat in the school cafeteria,
88 which was weird and probably performative because I think Kazoo ate meat. The plaintiff ran
89 onto our school's basketball court when we were playing in the Regional Finals and tried to glue
90 their hands to the center of the court. But they used Elmer's glue. You know, the white glue that
91 elementary kids use. It did not dry fast enough and they were just dragged off the court and got
92 suspended for a couple days.

93 13. The plaintiff got better at protesting things, though. And more aggressive. The talk
94 in town was Kazoo was getting bolder. Just about everybody thought it. I remember on May 1 of
95 2025, just a few weeks before the incident in question, I saw them go farther. The plaintiff was
96 protesting outside WOFF! ... again. It was becoming a weekly event at that point. I was back at
97 WOFF! inspecting some of the ostriches as I was making some buying decisions for my
98 restaurant. As you know, WOFF! gets tourists from all over. That day there were two busloads
99 of German tourists from Hanover, Germany, which is the German sister city of
100 Clearwater. Hanover is kind of like the Clearwater of Germany — not too big, not too small, and
101 lots of weird court cases. Someone had tipped off Kazoo that the Germans were going to be there
102 and Kazoo was pacing back and forth outside the main gate of WOFF! with a megaphone chanting
103 and yelling. Mostly they kept yelling "Strauss raus! Strauss raus!", which is German for "Ostrich
104 out! Ostrich out!", I think. All of a sudden Kazoo rushed through the gate to the farm, broke
105 through the second main gate on the property, and ran toward a security camera outside the baby
106 enclosure. Kazoo was raising their megaphone and looked like they were going to smash the
107 security camera outside the baby enclosure. The defendant had hired two security personnel for
108 the event. They tackled Kazoo and smashed their megaphone during the tussle before Kazoo got
109 to the security camera. When Kazoo was on the ground they started yelling, "My knee! My
110 knee! Ahhyee ahhyee owww! You are hurting my knee!" The two security personnel dragged
111 Kazoo out while they were wailing "I never give up! This isn't over!", and then the two guards
112 literally threw Kazoo out the main gate. The plaintiff limped away seemingly in a lot of pain. The
113 Germans thought it was all some kind of modern theater performance or something and applauded
114 accordingly. I don't know why they thought that. I thought it looked totally sus. Sure enough,
115 what I also saw was when Kazoo was far enough away that almost nobody could see them they
116 stood up straight and walked away like they were unhurt. Being injured was just an act.

117 14. I do recall when the two security personnel were dragging Kazoo out of WOFF!
118 Kazoo had the same fire in their eyes that O'Wary had when they stormed out of the WOFF!
119 offices. The plaintiff was 100% delulu. They were capable of doing anything. Totally skibidi.

120 15. The news media has been after WOFF! from the start and I know Kazoo is behind
121 it. They don't know what they're talking about, and the effect these stories can have on local
122 businesses. I mean, if something happened to WOFF!, I'd lose my most popular menu item. It
123 would have a huge impact on my business.

124 16. Why yes, I do wear men's size 9/women's size 10 shoes. I do have Adidas
125 Gazelle's, but I don't know why that matters. What, are we examining each other's footware, now?

126 17. Exhibit B is a picture of the ostrich I found. Exhibit C is a fair map of the area,
127 though it doesn't show the park, which is off-map to the upper left. I have seen Exhibits E and F
128 when they were originally posted, but I think it was all a part of Kazoo's campaign against WOFF
129 and Jake.

Blake Deadly
Blake Deadly

Subscribed and sworn before me
on this 7th day of July, 2025

Kenneth Dortzbach
Notary Public, Clearwater County Wisconsin
My Commission: is permanent.

AFFIDAVIT OF CAMILLE RHEA

Camille Rhea, being first duly sworn, states as follows:

1 1. My name is Camille Rhea. I am an adult resident of the State of Wisconsin, living
2 at 1758 Struthio Cir., Clearwater, Wisconsin.

3 2. I'm 43 years old and I grew up in Clearwater. My maternal grandparents emigrated
4 from Brazil in the 1940s and made Clearwater their home. They came with little more than the
5 clothes on their backs, but they chose Clearwater because of how beautiful the area is and the flora
6 and fauna. My mom stayed here and married my dad, a native of Clearwater.

7 3. I attended Clearwater University, where I received my B.S. in Fish, Wildlife, and
8 Conservation Biology. While at Clearwater University, I was the President of the university's
9 Birding Association, a chapter of the American Birding Association. I decided to pursue my PhD
10 in evolutionary biology and attended Stanford University. I received my PhD in 2012, and my
11 research focused on the social structures of large, flightless birds, such as ostriches, rheas (I know),
12 emus, and cassowaries. My research required that I study the anatomy and biology of these birds.
13 Further, I spent time in Africa, South America, and Australia studying these large birds.

14 4. My love, some say obsession, for birds began because I was literally saved by one.
15 When I was six years old, my parents and I were hiking through Clearwater State Park. I ran ahead
16 at one point and found an eroded fence, and I snuck through. It was the same fence that a few years
17 ago, a group of kids snuck through looking for treasure, ending, tragically, in one of their deaths.
18 I almost went off that cliff too, but a cliff swallow that had her nest nearby started chirping at me.
19 She warned me away from the ledge and she guided me back to the fence. She waited nearby until
20 my parents found me by the fence. Since then, I have been fascinated by birds. Most people think
21 "birdbrained" is an insult, but I wear the badge proudly.

22 5. While pursuing my PhD, I spent six months in Oujeft, a relatively small town in
23 western Mauritania. While in Oujeft, I studied *Struthio camelus*, otherwise known as the common
24 ostrich. This is the ostrich that would most likely come to mind if I asked you to picture one. I was
25 able to observe them during both winter and during mating season. During winter, ostriches will
26 usually only be alone or in a pair, while during mating season, they may gather into a group of up
27 to 100 birds and travel with other grazing animals.

28 6. Poachers were a threat to the ostriches, and I saw attempts at poaching while I was
29 in Oujeft. Poachers hunt the ostriches for their feathers or for their skin to sell the leather. Another
30 reason is to steal their eggs to sell to farmers for a premium. Part of my work in Oujeft was to help
31 stop such activities. Fortunately, many of the poachers were unprepared as I saw numerous
32 attempts to poach thwarted by the ostriches themselves kicking the poachers, causing them to run
33 from the birds. Almost every time, it was the poachers trying to steal the ostrich eggs that were
34 kicked.

35 7. After receiving my PhD, I worked at a bird sanctuary, called Wind Beneath Wings
36 ("WBW"). At WBW, I helped to care for and aided in the design of the enclosures for the birds.
37 WBW primarily cared for birds of prey, such as eagles, falcons, and vultures, but toward the end

38 of my time there, WBW received an emu. This was the first large bird that WBW had agreed to
39 care for. It was like I had been transported back to Oujeft looking out for the ostriches. I had to
40 ensure there were appropriate areas and protocols in place for Barney (the big birds are kind of
41 like dinosaurs, right?).

42 8. Working with Barney and my memories of Oujeft illuminated my purpose—to
43 leave WBW and create my own firm that consulted on creating habitats and care routines for large
44 birds in captivity. My firm's name is Strut in Form, I like to think it's a play on the large birds'
45 Order name. I have been operating it for the last ten years, and I have successfully created ethical
46 and ecologically correct habitats for hundreds of large birds—including those at Wisconsin Ostrich
47 Farm and Fun, Inc. ("WOFF").

48 9. Due to my experience in Oujeft, my studies, and my work, I'm very familiar with
49 ostrich behavior.

50 10. I would first note that ostriches are the most dangerous birds to humans, which is
51 why it is paramount to have appropriate protocols when dealing with captive ostriches. Per year,
52 there are a documented two-to-three deaths due to an interaction with an Ostrich in South Africa.
53 One reason for this is poaching activities conducted against the birds but also access due to the
54 farming of the birds, which creates much more ostrich-human interaction.

55 11. One of the many defense mechanisms belonging to adult ostriches, when agitated,
56 is to kick. Their kicks are able to generate a tremendous amount of force, equating to 2,210
57 Newtons: enough to kill large predators in the wild. Due to their physiology, they can only kick
58 forward. An ostrich's preference is generally to run from danger, as such, they will usually only
59 kick once. However, when they are very agitated, they may kick twice.

60 12. Baby ostriches will generally stay with their parents (they can run within hours of
61 hatching), and adult ostriches will shelter and protect them. Sometimes adults will even create a
62 distraction or fight to lure a predator from the baby. Baby ostriches generally freeze in place or lay
63 motionless on the ground when they feel scared in absence of their parents. Parents are fierce
64 protectors of baby ostriches.

65 13. Generally, ostriches cannot smell well. They primarily rely on their vision to detect
66 danger. However, their sense of smell is finely tuned to detect food and water. In general, they can
67 smell food up to 850 meters away. Some studies have suggested that they may also be able to use
68 their sense of smell to locate offspring, but none of those studies have been able to conclusively
69 state that this is possible.

70 14. One other peculiarity of ostriches is that they will eat meat. They are largely
71 herbivores; however, if their resources become scarce, they will eat meat. They will become
72 aggressive over food, but really only if they feel threatened or like they need to compete for
73 resources.

74 15. Nine times out of ten, an ostrich will choose to run when it senses danger. They are
75 the fastest two-legged land animal. They can reach speeds of 43 mph at their peak, but it has been

76 documented that they can reach 50 mph. When they must maintain running, they can run at 31
77 mph. When necessary, they can maintain this speed for up to 30 minutes.

78 16. While ostriches in the wild can run this fast, studies have been conducted on captive
79 ostriches to determine if they are able to run at the same speeds. Some of those studies have shown
80 that captive ostriches will often only be able to run at about $\frac{3}{4}$ of the capability of wild ostriches.

81 17. As stated previously, Montana Jake contracted with my firm to ensure that WOFF
82 had appropriate protocols and enclosures for their large birds. I spent many hours with Montana
83 Jake and their team providing training about best practices for taking care of the large birds. One
84 of the key things we discussed was ensuring that the lock to the enclosure was always engaged
85 once the employee was done working with the birds. Contrary to the popular saying of “sticking
86 your head on the sand,” which did originate with ostriches, they are naturally curious creatures and
87 would take the opportunity to explore the surrounding areas if the door were left unlocked.

88 18. Always interested in the well-being of the birds, I have also provided extensive
89 advice and training to Montana Jake and the WOFF crew regarding ostrich behavior and health. I
90 helped them move their ostriches’ diets off breakfast foods and onto more nutritious, plant-based
91 diets, and I connected them with a supplement company that helps make sure their needs are met
92 in captivity (I only receive a small commission from those sales). I’ve spent a great deal of time
93 advising them on how to formulate corrective action plans for their issues with the DNR and some
94 bad press, and I am not aware of continued safety issues or issues with the media since those plans
95 were put into place. Frankly, while I may have been paid for my time, I was doing them a HUGE
96 favor: I don’t think their business manager knew much about how to run this kind of facility until
97 I came around and trained them up.

98 19. Additionally, my contracts always provide for periodic check-ins to ensure that the
99 welfare of the large birds remains of utmost importance. I conducted semi-annual check-ins with
100 WOFF and found that they were no less than perfect in following the protocols that I set for them.
101 I’m not a veterinarian, but the ostriches appeared to be in good health.

102 20. Montana Jake contacted me after this latest incident, asking what else needs to be
103 done. And you know what? I said nothing, because I don’t think this happened the way Kazoo
104 says it happened.

105 21. That’s my first opinion: based on my knowledge of and experience with ostrich
106 behavior and my review of all of the case materials, I do not believe that it is plausible (or probable)
107 that a mama and baby bird escaped their happy, healthy environments, that the mama bird would
108 force entry into a residence, steal food (when they had perfectly good food back at home!), attack
109 someone who was just standing there cooking breakfast, only leaving when they had stolen
110 breakfast food and were chased out by a dog. None of this is consistent with an ostrich’s first
111 preference to run away—rather than toward—a potential predator, nor with the fact that ostriches
112 generally only kick when they are agitated.

113 22. Based on my knowledge of and experience with ostrich behavior, if the incident
114 even occurred in Plaintiff’s home, I think it is much more likely that the mama bird felt threatened

115 in some way: her described behavior best aligns with how an ostrich would behave when protecting
116 their young. I think that means Plaintiff probably had the baby ostrich and the mama ostrich came
117 in to create a distraction and disable the enemy to protect her baby. I'm no crime scene investigator,
118 but this aligns with Montana Jake's description of what they found that morning at WOFF. Either
119 that, or the mama ostrich was never in Plaintiff's house and attacked when Plaintiff was stealing
120 the baby at WOFF.

121 23. Yes, Montana Jake is paying me my usual rate for my time here today, just like
122 they usually pay me for my time consulting for WOFF.

123 24. Exhibits A and B are the baby and mama ostrich at issue. They do look familiar to
124 me and they belong to WOFF. Exhibit C is a fair map of the area. Exhibits E and F are posts I've
125 seen but I addressed all safety concerns after they were made. Exhibit K is a closing checklist I
126 helped WOFF develop. Exhibit M is a fair, accurate, and updated copy of my curriculum vitae.

Camille Rhea
Camille Rhea

Subscribed and sworn to before me
On this 18th day of August, 2025.

Kristin Pierre

State of Wisconsin, County of Clearwater
My commission is permanent.



EXHIBIT

B





DEAR REGAN KAZOO,

I KNOW HOW MUCH YOU CARE ABOUT PROTECTING ANIMALS, PARTICULARLY THE OSTRICH I THEREFORE FEEL I HAVE NO CHOICE BUT TO WRITE TO TELL YOU BOTH SOMETHING DEEPLY DISTURBING THAT I EXPERIENCE AND SOMETHING THAT HAS WEIGHED HEAVILY ON MY CONSCIENCE SINCE.

I HOPE YOU CAN UNDERSTAND THAT I'M NOT PROUD OF MY RESPONSE AND SEE THAT MY TELLING YOU THIS NOW IS A REFLECTION OF HOW MUCH I TOO CARE ABOUT OUR BIG FEATHERED FRIENDS!! GIVEN WHAT I AM ABOUT TO TELL YOU, I ALSO HOPE YOU CAN UNDERSTAND THAT I CAN ONLY DISCLOSE TO YOU THAT I AM FROM SASKATOON, SASKATCHEWAN, AND NO MORE.

A FEW MONTHS AGO, I AS AN AVID LARGE-BIRD ENTHUSIASIST DECIDED TO TAKE A TRIP ACROSS THE BORDER TO VISIT WOFF! IN CLEARWATER, WI. UPON FIRST ARRIVING, WOFF SEEMED NICE ENOUGH AND HAD NO SHORTAGE OF OSTRICHES. LITTLE DID I KNOW HOW DANGEROUS IT WAS!

ABOUT HALFWAY THROUGH MY VISIT, I HAD TO MAKE A PIT STOP IN THE RESTROOM. THE DOOR TO THE RESTROOM WAS PROPED OPEN, PRESUMABLY BECAUSE IT WAS SUCH A HOT DAY. HAVING TAKEN CARE OF BUSINESS, THERE I AM, AT THE SINK, MINDING MY OWN BUSINESS WHEN BAM! AN OSTRICH—FULL, SIZE, ADULT OSTRICH—COMES RUNNING INTO THE BATHROOM!! WHAT???? SEEING ME, IT PANICKS, AND KICKS ME IN THE RIGHT SHIN!!! WHAT????? I SHOUTED

IN SURPRISE AND THE OSTRICH RAN AWAY. IT HURT--I STILL HAVE A SCAR!

WHAT KIND OF ESTABLISHMENT WOULD LET THEIR OSTRICHES OUT LIKE THAT TO ATTACK GUESTS? MORE IMPORTANTLY, IT WAS CLEAR TO ME THAT THE OSTRICH WAS SCARED AND DISTRAUGHT. WHAT KIND OF ESTABLISHMENT WOULD TREAT THEIR BIRDS THAT WAY?

THAT'S NOT THE END OF THE STORY. THERE I WAS, NOW IN SHOCK AND TRYING TO CLEAN UP THE CUT ON MY LEG, AND IN COMES THE OWNER AT A FULL SPRINT. DAKOTA JAKE. IS IT DAKOTA? IT'S SOME STATE BUT I GET ALL THE U.S. STATES MIXED UP. ANYWAY, JAKE CLOSES THE DOOR AND ASKS IF WE CAN TALK PRIVATELY. JAKE APOLOGIZES AND SAYS THAT SOMETHING LIKE THIS HAS NEVER HAPPENED AND THAT THIS IS THEIR FAMILY BUSINESS AND THEIR LIVELIHOOD DEPENDS ON IT. JAKE THEN, TO MY COMPLETE SHOCK, OFFERS ME TEN GRAND (U.S. DOLLARS) IF I'LL KEEP MY MOUTH SHUT ABOUT THE WHOLE THING. WHAT?????

I'M NOT PROUD TO ADMIT I TOOK THE MONEY. I'M ASHAMED. BUT I DID. I'VE ALWAYS WANTED TO START A SASKATOON BERRY PIE BUSINESS, AND NOW I FINALLY CAN. BUT I WILL NEVER STAY SILENT ABOUT THE OSTRICHES!!! I'M TOO FAR AWAY TO DO ANYTHING, BUT I HOPE YOU CAN INVESTIGATE THIS MATTER AND MAKE SURE THAT WOFF! IS NOT ALLOWED TO CONTINUE ENDANGERING ITS GUESTS OR BIRDS!!!!

YOURS TRULY,
ANONYMOUS FROM SASKATOON



@theClearwaterCourier

June 20, 2021

Watch the footage at the [link](#) in our bio.



ESCAPED OSTRICH PECKS AND BREAKS CAMERA, STEALS BREAKFAST FROM McD'S DRIVE-THRU

Community members express concern about local ostrich farm's security practices, claiming stray ostriches present a safety risk. DNR investigates. [Click here to read further.](#)



15 Nudges

EXHIBIT

E



@theClearwaterCourier
August 4, 2023

Is twice enough for a pattern? (Image from 2021 news story.)



ESCAPED OSTRICH JOINS DENNY'S PATRONS FOR BREAKFAST, STEALS MOONS OVER MY HAMMY ® AND GRAND SLAMWICH ®

No one was injured, as “diners were so startled they just handed their plates over.” DNR investigates local ostrich farm for the second time in two years. [Click here to read further.](#)



 15 Nudges

@KazooForAnimals commented:

August 4, 2023

Enough is enough! Freedom for Ostriches now! Who's with me?

EXHIBIT

F



@KazooForAnimals
May 1, 2025

Make no mistake, keeping large birds like WOFF! does is the same as killing them. They don't have what is necessary to thrive in the conditions that WOFF! provides. We should be doing all that we can to help them, not kill them. Thanks to all who came out today.



7 16 1 3 Nudges 2

@MommyKazoo commented:

May 1, 2025
Proud of you!

@KazooForAnimals replied:

May 1, 2025
I'm almost ready to go over there now and let the birds out.
SET THE BIRDS FREE

EXHIBIT

G



@KazooForAnimals

May 2, 2025

WOFF! THINKS THEY ARE HELPING THE BIRDS. THEY AREN'T. NEVER EVER SHOULD WE BE KEEPING BIRDS LIKE THIS. LOOK AT THAT OSTRICH. SAD! SET THE BIRDS FREE



12



14



3



4 Nudges



5

EXHIBIT

H



@KarenAgain
May 20, 2025

Hey @prairiepreserveneighborhood, looking out my window while doing dishes. That Border Collie is at it again. Headed toward the park. Probably going to #2 in someone's yard again. I wish animal control would do something about these repeat offenders. Now my cat is all riled up.



@UncleT

May 20, 2025

Hey, @clearwaterhumaneagency, can you do something about this? It's out of control. Maybe you can do something about the ostrich situation, too?

@clearwaterhumaneagency

May 20, 2025

Sorry, you'll have to call the humane officer.

EXHIBIT

I



Above: Adidas Gazelle shoe bottom as shown on Adidas website

Also from Adidas website: a men's size 9 is 10.4"

Left: footprint found in dirt

10.4"

(Not to scale on
this exhibit)

EXHIBIT

J

WOFF Closing Checklist

Date:

Initials	Action
	<i>Parking Lot</i> Ensure parking lot is clear of debris. _____
	Take note of any cars left in parking lot. _____
	<i>Gift Shop and Café</i> Count cash in register. _____
	Lock register (with cash) in back room. _____
	Wipe down all tables and counters. _____
	Place chairs on top of tables. _____
	Sweep and mop floors. _____
	Wipe down café machines. _____
	Run hot water down drains. _____
	Turn off all lights. _____
	Lock door to gift shop and café. _____
	<i>Admin Office</i> Make sure all lights are off. _____
	Make sure business manager office locked. _____

EXHIBIT

K

Lock admin office

Ostrich Range

Complete headcount of ostriches.

Place five buckets of feed mix in trough and fill water trough.

Ensure lock is engaged.

Baby Area

Make sure heat lamp timers are on.

Place three buckets of baby feed mix in trough and fill water trough.

Complete headcount of baby ostriches.

Ensure lock is engaged.

CURRICULUM VITAE

Cassidy O'Wary
3448 Bennett Dr.
Clearwater, Wisconsin

(555)267-8824
E-mail: CassOWary@nudge.com

Personal

Born July 20, 1986, in Milwaukee, Wisconsin.

Education

The University of Wisconsin-Clearwater, Clearwater, Wisconsin, MBA—2015

The University of Wisconsin-Clearwater, Clearwater, Wisconsin—B.A. in Business—2008

Positions Held

Unemployed, 2025-Present

Wisconsin Ostrich Farm and Fun, Inc., Business Manager, 2015-2025

JP Morgan Chase, Financial Analyst, 2008-2013

Society Affiliations

Vice President, Corporate Finance Club, 2006-2008

Treasurer, *Beta Alpha Psi*, 2005-2008

EXHIBIT

CURRICULUM VITAE

Camille Rhea
Strut in Form
1758 Sthruthio Cir.
Clearwater, Wisconsin

(555)267-5765
E-mail: CRhea@strutionform.com

PERSONAL

Born May 11, 1982, in Clearwater, Wisconsin.

EDUCATION

Stanford University, Stanford, California, Ph.D. in Biological Sciences—2012
Dissertation: To Stick Your Head in the Sand or Not? A Study on Stress Responses in *Struthio camelus*.
Major advisor: Dr. Fran Oberlin (deceased)

The University of Wisconsin-Clearwater, Clearwater, Wisconsin, M.S. Biological Sciences—2006
Thesis: Struthio Phylogeny—Divergence in the Late Cretaceous.
Major advisor: Dr. Diane Byrd

The University of Wisconsin-Clearwater, Clearwater, Wisconsin—B.S. in Fish, Wildlife, and Conservation Biology—2004

POSITIONS HELD

Owner, Strut in Form, Clearwater, Wisconsin, 2015-Present

Research Fellow, Stanford University, 2010-2012

Teacher's Assistant, University of Wisconsin-Clearwater, 2007-2010

SOCIETY AFFILIATIONS

President, University of Wisconsin-Clearwater Birding Association, 2002-2004

Member, American Birding Association, 2000-Present

Member, National Audubon Society, 2000-Present

EXHIBIT

M

FIELD WORK

Oujeft, Mauritania

Publications listing provided upon request due to length.