

June 20, 2019

Via first-class mail and e-mail

Sheriff Thomas A. Ferrara
Solano County Sheriff's Office
530 Union Avenue, Suite 100
Fairfield, CA
IA@solanocounty.com; SHFPublicRecordRequests@SolanoCounty.com

Dear Sheriff Ferrara:

I am writing on behalf of People for the Ethical Treatment of Animals (PETA) to notify your agency of apparent violations of California's prohibitions against cruelty to animals, specifically, the starvation death on January 25, 2019, of Tiz Willow, a Thoroughbred horse whose care was the responsibility of Gustavo G. Medina. PETA respectfully requests that your agency initiate an investigation and file appropriate charges against Medina and any other culpable parties for any violations of California law.

According to minutes from meetings of the California Horse Racing Board (CHRB), Medina, a former exercise rider, assumed responsibility for Tiz Willow, who was apparently owned by Al Navarro, Steve Sanora, and Gary Stute.¹ Medina transported the horse from Golden Gate Fields in Berkeley on December 3, 2018, to a facility "near Vallejo."² The horse returned to Golden Gate Fields on January 23, 2019, and died in a stall two days later. The necropsy showed that malnutrition caused Tiz Willow's death³; the horse was foaled in March 2016.⁴ When questioned by the CHRB on June 2, Medina had no explanation for the horse's condition except to say that the other horses would not let her eat.⁵

It appears that Medina violated California law prohibiting cruelty to animals by depriving Tiz Willow of necessary sustenance and proper food and subjecting the horse to needless suffering.⁶ While Medina should certainly be deemed ineligible to participate in horse racing, it is imperative that any administrative penalties imposed by the CHRB not supplant a thorough criminal investigation for an apparently criminal act that likely caused considerable pain and suffering to Tiz Willow. Further,

¹ Tiz Willow, Horse Profile (Thoroughbred), Equibase,

<http://www.equibase.com/profiles/Results.cfm?type=Horse&refno=10212486®istry=T> (last visited June 19, 2019) (attached).

² Report for the period: Wednesday, May 22, through Monday, May 27, 2019, Cal. Horse Racing Bd., http://chr.ca.gov/Stewards/Minutes/Minutes_Golden_Gate/Minutes_GG_19_05_27.pdf (attached).

³ *Id.* The minutes refer to Tiz Willow as "him," but industry site Equibase indicates that the horse was a filly. See Tiz Willow, *supra* note 1.

⁴ Tiz Willow, *supra* note 1.

⁵ Report for the period: Thursday, May 30, through Sunday, June 2, 2019, Cal. Horse Racing Bd., http://www.chrb.ca.gov/Stewards/Minutes/Minutes_Golden_Gate/Minutes_GG_19_06_02.pdf (attached).

⁶ Cal. Penal Code § 597(b).

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- PETA Australia
- PETA Germany
- PETA Netherlands
- PETA Foundation (U.K.)

if Medina failed so egregiously to provide for Tiz Willow, there is a concern that other horses in his custody could also be at risk.

Thank you for your attention to this matter. I am happy to answer any questions you may have [REDACTED]. PETA would appreciate the opportunity to discuss this matter in person, and I will follow up with you in the coming weeks. PETA has directed this letter to your attention since Medina's alleged actions reportedly took place "near Vallejo"; if your investigation determines that the alleged starvation occurred in another jurisdiction, please notify me at your earliest convenience so that I can contact the appropriate law-enforcement agency.

Sincerely,

A handwritten signature in cursive script that reads "Elisabeth Custalow". The signature is written in black ink on a white background.

Elisabeth Custalow
Counsel and Manager of Regulatory Affairs