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Superior Court of California,  
County of San Diego

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Clerk of the Superior Court  
By Valeria Contreras, Deputy Clerk

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11 Attorneys for Plaintiff  
12 Showing Animals Respect and Kindness, Inc., and  
13 Animal Protection and Rescue League, Inc.

14 **SUPERIOR COURT OF CALIFORNIA**

15 **COUNTY OF SAN DIEGO**

16 SHOWING ANIMALS RESPECT AND )  
17 KINDNESS, INC., an Illinois nonprofit )  
18 corporation; and ANIMAL PROTECTION AND )  
19 RESCUE LEAGUE, INC., a California nonprofit )  
20 corporation, )

21 **Plaintiffs,**

22 **vs.**

23 PRO RODEO PRODUCTIONS OF POWAY, )  
24 INC., a California corporation; POWAY )  
25 VALLEY RIDERS ASSOCIATION, INC., a )  
26 California corporation; SALT RIVER RODEO )  
27 COMPANY, LLC, an Arizona limited liability )  
28 company; PROFESSIONAL RODEO )  
COWBOYS ASSOCIATION, INC., a Colorado )  
corporation; and DOES 1-10, )

**Defendants.**

**CASE NO. 37-2019-00039538-CU-BT-CTL**

**VERIFIED COMPLAINT FOR  
ILLEGAL BUSINESS PRACTICES IN  
VIOLATION OF THE UNFAIR  
COMPETITION LAW**

**[Bus. & Prof. §§ 17200 et seq.]**

1 Plaintiffs SHOWING ANIMALS RESPECT AND KINDNESS, INC. and ANIMAL  
2 PROTECTION AND RESCUE LEAGUE, INC., on behalf of themselves and the general public, allege  
3 as follows against Defendants PRO RODEO PRODUCTIONS OF POWAY, INC., a California  
4 corporation; POWAY VALLEY RIDERS ASSOCIATION, INC., a California corporation; SALT  
5 RIVER RODEO COMPANY, LLC an Arizona limited liability company; PROFESSIONAL RODEO  
6 COWBOYS ASSOCIATION, INC., a Colorado corporation; and DOES 1-10:

7 **INTRODUCTION**

8 1. Plaintiffs brings this private attorney general action under Business and Professions Code  
9 § 17200 (the “Unfair Competition Law” or “UCL”) on their behalf and on behalf of the general public.  
10 Plaintiffs seek no different or greater relief for themselves than for the general public in this action.

11 2. Defendants are in the business of operating the annual Poway Rodeo in Poway,  
12 California (the “RODEO.”) In doing so, Defendants have been illegally shocking tame horses while they  
13 are in the chutes just prior to releasing them into the rodeo arena with a rider on top, in order to cause  
14 the horses to buck wildly, giving these tame, domesticated horses the appearance of being wild,  
15 “bucking broncos.”

16 3. The Poway Rodeo is scheduled to take place again September 27 and 28, 2019. Plaintiffs  
17 seek a temporary restraining order, preliminary injunction, and permanent injunction to enjoin  
18 Defendants and their agents from illegally shocking horses in violation of Penal Code § 596.7(e), which  
19 requires a rodeo to “ensure that no electric prod or similar device is used on any animal once the animals  
20 is in the holding chute ....”

21 4. Plaintiffs also seek a temporary restraining order, preliminary injunction, and permanent  
22 injunction to enjoin Defendants and their agents from illegally shocking horses in violation of Poway  
23 Municipal Code § 6.24.010(B), which prohibits the use of electric prods or shocking devices, and  
24 provides, “In no event shall any such device be used on an animal while in a chute or immediately prior  
25 to entering a chute.”

26 **PARTIES**

27 5. Plaintiff SHOWING ANIMALS RESPECT AND KINDNESS, INC. (“SHARK”) is a  
28 non-profit corporation duly formed and validly existing under Illinois law. SHARK’s mission is to

1 expose and eliminate animal cruelty. The illegal acts of Defendants have caused SHARK to divert  
2 organizational resources from its core activity of protecting animals and has instead caused SHARK to  
3 focus these resources on investigating, exposing and seeking to stop Defendants' unlawful activities.

4 6. ANIMAL PROTECTION AND RESCUE LEAGUE, INC. ("APRL") is a non-profit  
5 corporation duly formed and validly existing under California law. APRL's mission is to expose and  
6 eliminate animal cruelty. The illegal acts of Defendants have caused APRL to divert organizational  
7 resources from its core activity of protecting animals and has instead caused APRL to focus these  
8 resources on investigating, exposing and seeking to stop Defendants' unlawful activities.

9 7. On information or belief, Defendant PRO RODEO PRODUCTIONS OF POWAY, INC.  
10 is a California corporation with headquarters in San Diego County and is a producer of the RODEO.

11 8. On information or belief, Defendant POWAY VALLEY RIDERS ASSOCIATION, INC.  
12 is a California corporation with headquarters in San Diego County and is the facility owner of the  
13 RODEO.

14 9. On information or belief, Defendant SALT RIVER RODEO COMPANY, LLC is an  
15 Arizona limited liability company with headquarters in Arizona and is the stock contractor for the  
16 RODEO.

17 10. On information or belief, Defendant PROFESSIONAL RODEO COWBOYS  
18 ASSOCIATION, INC. ("PCRA") is a Colorado corporation with headquarters in Colorado and  
19 describes itself as the sanctioning body for the RODEO. PRCA states on its website that "the PRCA is  
20 committed to maintaining the highest standards in the industry in every area, from improving working  
21 conditions for contestants and monitoring livestock welfare."

22 11. Plaintiffs do not know the true names and capacities of the defendants named in this  
23 action as DOES 1-10, and therefore, sues them under fictitious names. Plaintiffs will request permission  
24 to amend this complaint, or substitute the Doe Defendants via a court-approved form, to state the true  
25 names and capacities of these fictitiously named Defendants when it ascertains them. Plaintiffs allege  
26 that these fictitiously named Defendants are legally responsible in some manner for the acts set forth  
27 below, and accordingly, are liable for the relief requested.



1           22.     Screenshots from SHARK's video of one of Defendants' agents shocking horses at the  
2 2018 RODEO are below:





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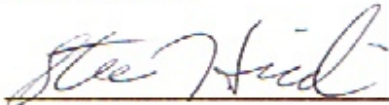
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**VERIFICATION**

I, Steve Hindi, am the President of Showing Animals Respect and Kindness, a Plaintiff in the above Complaint, and I am familiar with its contents. The same is true of my own personal knowledge, except as to those matters alleged on information or belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury the foregoing is true and correct.

Dated: July 29, 2019

By:   
Steve Hindi