

ELECTRONICALLY FILED

2026 Apr 09 PM 2:18

CLERK OF THE SALINE COUNTY DISTRICT COURT

CASE NUMBER: SA-2026-CR-000232

SEALED

IN THE DISTRICT COURT OF SALINE COUNTY, KANSAS

STATE OF KANSAS
PLAINTIFF

26CR231
26CR232

VS.

ANDREA LYN MURPHY
MONIQUE MARIE HAWLEY

DEFENDANT

STATE OF KANSAS
COUNTY OF SALINE

FILED
SALINE CO. DISTRICT COURT
2026 MAY -8 AM 10:08

AFFIDAVIT

Comes now, Kody Trower, Deputy Sheriff for Saline County, Kansas, currently assigned to the Operations (Patrol) Division, being duly sworn, upon my Oath hereby depose and state that; the State of Kansas became the victim of, Cruelty to Animals and it is believed that Andrea Lyn Murphy and Monique Hawley is/are responsible for the above act(s).

Affiant is now, and has been at all times relevant, a Deputy Sheriff with the Saline County Sheriff's Office and thereby is a commissioned Law Enforcement Officer.

This Affidavit is not intended to be a comprehensive report on the investigation of the allegations, but is limited to showing Probable Cause that one or more violations of the Kansas Criminal Code occurred, Probable Cause that the defendant above named committed the acts that were in violation, and that the same occurred in Saline County, Kansas.

Based upon the information from the described investigation, Affiant has learned the following, either from his own investigative work or that of other law enforcement officers, witnesses and others, all of which Affiant verily believes to be true, to wit:

On March 5th, 2026, Officer Surface of the Salina Police Department received a report from the Kansas Bureau of Investigation (KBI) regarding a complaint they received about the Salina Animal Shelter and it's employees.

The complaint came from a resident of Salina named Kimberly Hill. In the complaint it was stated that three puppies were euthanized in the front lobby of the Salina Animal Shelter (329 N. 2nd Street, Salina, Saline County, Kansas) using a "heart stick method", without being sedated beforehand, by a shelter employee named Andrea Murphy.



Officer Surface spoke with Kimberly who said that most of her information for the complaint came from public records, Animal Shelter Advisory Board meetings, and word of mouth. Kimberly also stated that Michelle Timson had more information on the subject.

Officer Surface received a call from Michelle Timson who explained that she had also made a complaint to the KBI. Her complaint was regarding numerous practices of the Salina Animal Shelter but included her conversations with previous employees [REDACTED]

On March 20th, 2026, I went to the Salina Animal Shelter and spoke with multiple employees. I first spoke with the Animal Services Manager Monique Hawley, who informed me that the incident (which I later learned occurred on December 16th, 2025) began when a male brought three puppies into the shelter lobby that he had located inside of a shed. Monique described the animals as "very sickly", dirty, and smelly. One of the puppies defecated in the lobby and the stool was very loose and bloody, which according to Monique was indicative of the Canine Parvovirus (parvo). They used a test for parvo and it came back positive.

Monique explained that parvo was a very fast spreading and dangerous disease and it was the Salina Animal Shelter policy to euthanize all animals with parvo under their care. Because of this it was decided that the animals would be euthanized in the lobby.

Monique told me that the employees present for the euthanasia were Andrea Murphy, Alexis Cunningham, and potentially another employee as well as Monique.

Monique said that she held the animals while Andrea performed the injection. According to Monique they first attempted an injection via vein on the first puppy, but due to it's dehydration, the injection was only partially effective causing the animal to become drowsy. After that, Monique said they attempted "pleural" (IP) injections on the animals which she described as being into the abdomen. She clarified that they did not do a heart stick.

Monique further stated that typically Ketamine was used on animals prior to injection of Fatal Plus Solution (the fatal drug) as a form of sedation, but that was not used in this case because the puppies were very lethargic and "out of it". She said, "I don't know that they felt anything".

I asked what made this situation different from a "typical" euthanasia. She said that they were usually performed in a separate room, but that would have required them to be carried through the shelter near where other animals were housed. During this process the lobby was locked and they closed the shelter for the remainder of the day for sanitation. She added that due to the high danger of infecting other animals with such a dangerous illness, there was a sense of urgency around getting the animals euthanized quickly. [REDACTED]

I next spoke with Alexis Cunningham, another employee of the Salina Animal Shelter. Alexis told me that she was present for the incident involving the three puppies. She described herself as "admin" who did not usually see that type of thing. Alexis described a similar course of events with the male bringing in three puppies who were clearly very sickly and had runny stool on the

floor. Alexis said the animals smelled bad and clearly smelled of parvo. After there was a positive test for parvo on one puppy Andrea decided that they needed to be euthanized saying something like, "we're not going to risk it spreading". Alexis said the other two puppies were clearly showing the same symptoms as the one which tested positive. Alexis said that the way the euthanasias were performed made her and other staff members very uncomfortable.

Alexis said the following people were present for the incident; Heaven Turner, Janae Valenta, Jurzy Kaeding, Monique, Andrea, and another employee named Emily.

I next spoke with Heaven Turner. Heaven's basic description of events matched what I had learned so far. She confirmed that the animals were euthanized because of the positive parvo test and it was done in the lobby to prevent the spread of the disease to other animals. Heaven acknowledged that she was not typically involved in euthanasias

Heaven gave me the same list of employees who were present as Alexis but clarified that Jurzy only came to the lobby after it was complete.

Heaven confirmed that animals which were positive for parvo were always euthanized due to the danger of the disease and poor outcomes.

I inquired about camera footage of the Salina Animal Shelter lobby. Monique informed me that there were cameras but the footage was only maintained for 10 to 14 days.

On March 24th, 2026, at approximately 3:00 PM, I spoke with Andrea Murphy in her office at 300 W. Ash Street (the Salina/Saline County City/County Building). I told Andrea that the primary complaint I was there to speak with her about was the incident involving the euthanasia of three puppies. Andrea was familiar with the incident in question and I asked her to explain it to me.

Andrea said a male came to the shelter with 3 puppies he located a couple of days earlier. Andrea helped him carry them inside (into the lobby) and it was clear from when she first saw them they were clearly very sickly and smelled of parvo, which she described as a distinct smell. She said once they were in the lobby the animals were clearly very lethargic and were in and out of consciousness. They used a "snap test" to test the fecal matter on the floor for parvo. Andrea said the test came back positive within two minutes and it usually takes up to 10 minutes. She said this was an indicator of a high viral load.

Andrea stated that per Salina Animal Shelter policy, animals with the parvovirus were to be euthanized because it was very contagious and posed a danger to other animals in the shelter.

According to Andrea, since the puppies were in and out of consciousness, they decided to perform the euthanasia without sedation. She said it was typical, if the animal were larger and fully

conscious, to use a combination of Ketamine and Xylazine for sedation. She added that the sedation also slowed the heart rate of the animal, causing the Fatal Plus Solution to act slower.

Monique held the animals while Andrea performed the Fatal Plus injections. On the first animal, Andrea said she attempted to administer the drug intravenously but since the animals were so dehydrated she was unable to get a vein in their front leg. Andrea said, "At that point we decided to go to IP. Which would be intraperitoneal, it's into the abdominal cavity".

Andrea described two options for intraperitoneal injections. One person can hold the animal vertically and the injection is placed under the ribs, or the assisting person can hold the animal on the ground while the injection is administered. They opted to have Monique hold the animals on the ground out of consideration for the staff viewing the procedure.

Andrea said the first two went very well without any kind of "fighting", since they were so lethargic. The third puppy, which Andrea said had been acting the same as the others, started "flopping around" and trying to bite as soon as the injection happened. Andrea said this was the result of the medication "burning" when it was injected. To avoid anyone being bitten she wrapped the animal in a towel.

Andrea told me that it was her first time getting parvo puppies at the shelter [REDACTED] and didn't want them going anywhere else in the building.

At that point the animal shelter was closed to the public and Andrea made a post informing the public that the shelter was closed. They sanitized for the remainder of the day.

Andrea informed me that video of the incident was no longer available because their systems recorded over videos every 10 to 14 days. During the interview, Andrea informed me that Jurzy Kaeding was not present for the euthanasia of the three puppies but only came to the lobby after it was complete because Andrea requested that she bring up clean shirts for the staff.

On March 27th, 2026, I received a call from Susan Nickel, who wished to provide additional information regarding the incident at the Animal Shelter. Susan was a concerned citizen (not an employee of the shelter) who had been working with others including Michelle Timson, regarding changes at the Salina Animal Shelter.

Susan said that the Animal Shelter and or the City of Salina were claiming that the euthanasia of the three puppies was not done via intra-cardiac injection but rather by using intra-peritoneal injection. Susan said she "absolutely" knew that wasn't true. Susan had been given internal records, including emails, from the City of Salina via an open records request which led her to believe the actual method of injection was intra-cardiac. She said she also had been given a witness statement from an anonymous witness to the incident which confirmed the route as intra-cardiac.

Susan went on to say that during a City of Salina Commission Meeting (which was open to the public) the Director of Parks and Recreation, Jeff Hammond, said the method they used was intraperitoneal. The Salina Animal Shelter was under the Department of Parks and Recreation.

Susan sent me the documents (internal records) that she was referring to and I reviewed them. In the documents was a "Euthanasia History Report" which listed the size and breed of the dogs as well as the amount of Fatal Plus used. It did not list the method. I was given these same documents by Monique Hawley. The Salina Animal Shelter policy regarding parvovirus and euthanasia procedures was attached. The policy outlined that animals with parvovirus were to be euthanized to prevent spread to other animals, and the protocol listed IV access as the preferred method but intra-peritoneal as an option if IV access is distressful, dangerous, or impractical. It further stated, "Intraperitoneal injections are permitted in cats, birds, and pocket pets but it is preferred for the animal to be sedated and/or unconscious first". It further stated that all euthanasia's should be performed with a lethal injection in accordance with the "AVMA" (American Veterinary Medical Association).

In the documents was a chain of emails between Andrea Murphy and other city officials regarding the incident and other concerns. In the chain there was an email from Andrea stating:

"Referencing the heart stick. We were trained and signed off by our contracted veterinarian to use the heart stick when we are unable to use IV method and the animal is unconscious. We do it rarely but have had the training (not to state standards) to use it to confirm death in an animal. I am more than halfway through the Euthanasia by Injection training we will be using as the certificate program, and everything so far matches with what we were taught and have been doing. The problem is the record keeping and documentation of the route and sedative that the state pointed out".

On March 27th, 2026, I called Alexis Cunningham and spoke to her on the phone. I asked her what method of euthanasia was used on the puppies. She said, "they were heart sticking them". When I asked where on the body the injection was, Alexis said it was between the chest and ribcage area.

On March 30th, 2026, I called Jurzy Kaeding and spoke with her over the phone. I asked Jurzy about the incident involving the three puppies with parvovirus being euthanized.

Jurzy told me she was in the surgery suite and was asked to come to the lobby with syringes for some puppies with parvo that needed to be euthanized. Jurzy said that when she got to the lobby, Andrea had Fatal Plus "pulled up". She said Andrea laid the puppies down on a mat without any sedation and euthanized "all three puppies via heart stick". She said that prior to the injection all three puppies were completely awake, walking around, and trying to play. She added that there were puddles of diarrhea on the floor which were clear signs of parvo, but she didn't see any lethargy in the animals.

I asked her to describe why she thought it was a heart stick. She said they were held down by Monique while Andrea stuck a needle into their chest through their ribs. Jurzy said that after sticking the needle in, Andrea pulled back on the plunger to see if there was blood, before injecting the solution. Jurzy explained that it was to confirm that the needle was in the heart. Jurzy only saw blood in the syringe on one of the puppies and thought Andrea was not able to get it on the other two. Jurzy thought the first injection hit the heart because that puppy died quickly. She said the other two got up and ran while yelping.

Jurzy informed me she had been trained to do intra-cardiac euthanasias by Dr. Melissa Juby, the veterinarian who contracted with the Salina Animal Shelter. Jurzy said usually the intra-cardiac injection is done in between two ribs and is measured by pulling the animals elbow up and where the elbow stops is where the injection is done. She added that 100 percent of the time the animal should be sedated.

Later on March 30th, 2026, at approximately 2:45 PM, I went to the Salina Animal Shelter and spoke with Janae Valenta, an Animal Control Officer.

Janae told me that she was present for the entire incident. She said that after the dogs were brought into the lobby one defecated on the floor and it had the look and smell of the parvo, which she described as very distinctive. After the feces was tested for parvo it "instantly popped up positive". According to Janae, after that, Andrea decided that the dogs needed to be euthanized quickly, grabbed the euthanasia kits, and said something to Monique like, "the fastest and easiest way we're going to do this is we're just going to heart stick them". Janae said Andrea said that audibly. Janae described the animals as being visibly sick and not playful or running around, but they were fully conscious.

Janae did not see Andrea or Monique attempt to use a vein first for the injection. She added that the dogs were not sedated and heart sticks were not allowed unless the animals were sedated. Janae said that all three dogs had to be held down [REDACTED]

[REDACTED] She described the heart stick method as the fastest but most painful method of euthanasia. While the second puppy was being euthanized [REDACTED] Janae left the room and stood in the hallway and was contemplating leaving her job. While in the hallway, Janae remembered seeing Jurzy walking up from the surgery area. Janae said Jurzy didn't witness any of it.

Janae had been trained to do intra-cardiac injections by Dr. Juby and had witnessed it done before. She had never done one herself. She described the injections on the three puppies as being beneath the arm, on the side, in the ribs. Janae described the same process for doing an intra-cardiac euthanasia as Jurzy did.

Janae informed me that later that day she contacted Dr. Juby out of concern for what happened.

I asked Janae what she thought the motivation was for the way in which the animals were euthanized and she told me she thought judgements were made too quickly. She thought that the intention was to perform the euthanasias quickly to protect the rest of the animals at the shelter and she truly didn't think there was cruel intentions.

Next I spoke with Heaven Turner again. I asked Heaven what method was used for euthanasia on the puppies and she said, "the heart stick". Heaven was pretty sure Andrea said out loud that she was going to do a heart stick. She thought the injection was done on their chest, but she didn't look closely while it happened.

I spoke with Monique again. Monique said that the area of injection on the first dog was on the left side beneath the arm, in the lower rib cage area. She thought the other two were performed the

same, but didn't remember exactly. I asked about it being called an IP and Monique replied, "Right, it's kind of that abdominal pleural area". She said that the heart and lung were all on that side and you never know for sure what you're going to hit, it could be the heart, lungs, or pleural space. Monique clarified that it could have been a heart stick because the heart is in that area and could have been hit during the process.

I asked Monique if Andrea said out loud that she was going to do a heart stick. Monique said that she didn't remember for sure because the situation was fast and hurried. Monique described the animals as sick and "wobbly" but not unconscious.

On April 2nd, 2026, I spoke with Dr. Melissa Juby on the phone.

Dr. Juby told me that she was contacted the evening of the incident (12/16/25) by an employee who informed her the method of euthanasia was intra-cardiac injection without any sedation. Dr. Juby informed me that according to American Veterinary Medical Association standards, intra-cardiac was only an option for fully anesthetized and unconscious animals, often which occurs when they the animal is having a procedure done, and it is determined that the animal needs to be euthanized.

Dr. Juby said that after speaking with the employee, she sent an email to the Director of Parks and Recreation, Jeff Hammond, explaining that the intra-cardiac method is never appropriate when the animal is not unconscious. She said that to do otherwise was inhumane.

Later that week, when Dr. Juby was in Salina, she had a meeting with Jeff Hammond, Andrea, and Monique. Dr. Juby said that during the meeting Andrea "took full responsibility for what happened. She said she just panicked in the moment. That she didn't want these puppies to continue suffering and that she was worried about transmitting parvovirus to the shelter" which Dr. Juby said was a valid concern.

Dr. Juby told me that the injections were in fact done intra-cardiac. I told her that I had been told it was an IP. Dr. Juby responded, "Nope, it was not, it was intra-cardiac". She said it was mentioned multiple times during the meeting that Andrea only used that method because she panicked.

I asked Dr. Juby if what happened constituted animal abuse and if the euthanasia could be called "inhumane". Dr. Juby stated, "I would say that it does constitute animal abuse and I outlined that in my email to Jeff". Dr. Juby further stated that she absolutely thought the puppies suffered and some of the people suffered who witnessed it.

I asked Dr. Juby what she thought the motivation was behind the way the euthanasias were performed. She said that she genuinely thought the motivation was to euthanize the puppies humanely as quickly as possible because the puppies were suffering from their illness and also to protect the other animals at the shelter from contracting the illness. She added that she thought they chose not to use the IV method due to the state of the animals, and chose intra-cardiac because they felt more confident they could hit the heart, rather than the vein. Dr. Juby stated that she later told them that intraperitoneal injections were for just that type of situation.

Dr. Juby informed me that as a result of the situation, she and the state opted to pull euthanasia certifications of all employees at the Salina Animal Shelter, pending further training.

Dr. Juby sent me the email, and upon review, the statements therein matched what I discussed with her on the phone. The email described using the intra-cardiac method on an awake patient as cruel and inhumane.

I reviewed the AVMA euthanasia standards as they are available online through the AVMA website (2020 Edition) under the section covering companion animals (which includes dogs). Intra-cardiac injections were listed under a section titled "Acceptable With Conditions". It listed intra-cardiac injections (and other intra-organ injections) as only acceptable in unconscious or anesthetized animals.

A warrant is hereby requested charging Andrea Lyn Murphy and Monique Hawley with 3 count(s) of Cruelty to Animals, a Misdemeanor, in violation of KSA # 21-6412 (a5b2A).

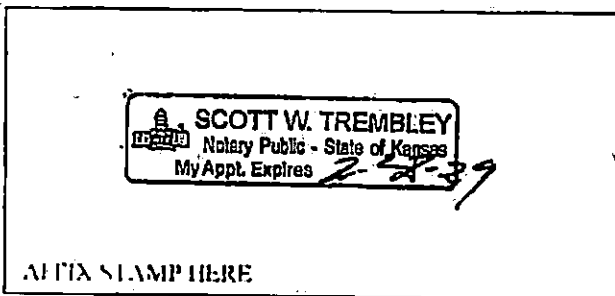
Information for this Affidavit is taken from official reports and investigations of the Saline County Sheriff's Office case(s) #2026-7014 and Salina Police Department case number 2026-5416



Deputy Sheriff Kody Trower
Affiant

Witnesses:

- Investigator Kody Trower - SASO
- Officer Heather Surface - SPD
- Alexis Cunningham - [REDACTED]
- Heaven Turner - [REDACTED]
- Michelle Timson - [REDACTED]
- Susan Nickel - [REDACTED]
- Jurzy Kaeding - [REDACTED]
- Janae Valenta - [REDACTED]
- Melissa Juby - [REDACTED]
- Kimberly Hill - [REDACTED]

Subscribed and sworn to before me, a Notary Public, in and for the State of Kansas,
this 6th day of April, 2026.




Notary Public