

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

-----X  
MARGARET HEALY,

Index No.:

plaintiff,

**SUMMONS**

- against -

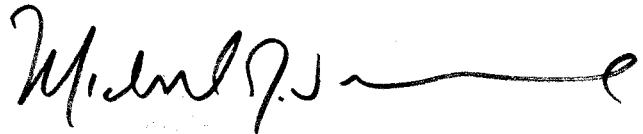
SLANEY O'HANLON and SUSAN McCARTHY,

defendants,  
-----X

TO THE ABOVE-NAMED DEFENDANTS:

You are hereby SUMMONED to answer the attached verified complaint in this action and to serve a copy of your verified answer or, if this complaint is not served with this summons, to serve a notice of appearance, on the plaintiffs' attorneys DEVEREAUX, BAUMGARTEN, 39 Broadway Suite 910, New York, New York 10006, within twenty (20) days after the service of the summons with verified complaint, exclusive of the day of service (or within thirty (30) days after the service), is complete. If this summons is not personally delivered to you within the State of New York, and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the verified complaint.

Date: September 22, 2011  
New York, New York



Michael J. Devereaux, Esq.  
DEVEREAUX BAUMGARTEN  
Attorneys for Plaintiff MARGARET  
HEALY  
39 Broadway, Suite 910  
New York NY 10006  
(212)-785-5959

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

-----X  
MARGARET HEALY,

Index No.:  
VERIFIED COMPLAINT

plaintiff,

- against -

SLANEY O'HANLON and SUSAN McCARTHY,  
defendants,  
-----X

MARGARET HEALY, by and through her attorneys, Devereaux, Baumgarten, with offices at 39 Broadway, Suite 910, New York, New York 10006, hereby avers as follows:

**THE PARTIES**

1. Plaintiff Margaret Healy ("Margaret Healy"), is a resident of the State of New York, City of New York, County of Kings.

2. Defendant Slaney O'Hanlon ("Ms. O'Hanlon"), is an individual residing in Queens County, New York at 39-23 213th Street, #2F, Bayside, New York 11361-2054.

3. Defendant Susan McCarthy ("Ms. McCarthy"), is an individual residing in Queens County, New York at 39-23 213th Street, #2F, Bayside, New York 11361-2054.

**NATURE OF THIS ACTION**

4. Margaret Healy is and has been the rightful owner of a dog named Lucy (hereinafter "Lucy"), for most of Lucy's life living in Kings County, New York.

5. On about September 13, 2011, Ms. O'Hanlon wrongfully demanded that Margaret Healy turn over Lucy because she wrongfully claimed that she was the rightful owner of Lucy.

6. Because Lucy was not turned over to Ms. O'Hanlon, both Ms. O'Hanlon and Ms. McCarthy began an aggressive and illegal campaign of aggravated harassment against Margaret Healy in an effort to intimidate her into giving Margaret Healy's dog Lucy to Ms. O'Hanlon.

7. This complaint seeks a declaratory judgment that Margaret Healy is the rightful owner of Lucy, a temporary restraining order and an order of protection preventing Ms. McCarthy and Ms. O'Hanlon or their agents and/or representatives from communicating with Margaret Healy or her husband in any way, except through counsel, preventing them from going to Margaret Healy's residence and taking any further actions to obtain Lucy during the pendency of this lawsuit.

8. This action also seeks monetary damages for Margaret Healy's mental anguish and pain and suffering resulting from Ms. McCarthy's unlawful assault and harassment.

9. The relief herein sought has not been made before nor ever made to any other Court or Judge.

**FACTS COMMON TO  
ALL CAUSES OF ACTION**

10. Margaret Healy is and has been a resident of Kings County, New York for over twenty (20) years.

11. Lucy was purchased by Margaret Healy's brother.

12. Margaret Healy's brother, at all relevant times, owned Lucy until Margaret Healy's brother gave Lucy to his sister Margaret Healy.

13. Margaret Healy's brother gave Lucy to Margaret Healy because Margaret Healy would afford and has afforded Lucy a great loving, caring, and stable life for most of Lucy's life.

14. Margaret Healy licensed Lucy, with license number 3070403. A true and accurate copy of the license is attached as Exhibit 1.

15. Margaret Healy vaccinated Lucy. A true and accurate copy of the Certificate of Vaccination is attached as Exhibit 2.

16. Margaret Healy is and has been acting in the best interests of Lucy most of Lucy's entire life.

17. Lucy has spent most of her life with Margaret Healy.

18. Lucy has lived with Margaret Healy in Kings County, New York for most of Lucy's life.

19. Lucy has been cared most of her life by Margaret Healy.

20. Margaret Healy is caring for Lucy.

21. Margaret Healy has been caring for Lucy for most of Lucy's life.

22. Margaret Healy has licensed Lucy and purchased the licenses for Lucy for most, if not all, of Lucy's life.

23. Margaret Healy holds the license for Lucy.

24. Lucy's license is in Margaret Healy's name as her owner.

25. Lucy is Margaret Healy's daily companion.

26. Lucy is Margaret Healy's morning companion.

27. Lucy is Margaret Healy's noon time and afternoon companion.

28. Lucy is Margaret Healy's evening companion.

29. Lucy is Margaret Healy's night time companion.

30. Lucy has been Margaret Healy's daily companion for most of Lucy's life.

31. Lucy has been Margaret Healy's morning companion for most of Lucy's life.

32. Lucy has been Margaret Healy's noon time and afternoon companion for most of Lucy's life.

33. Lucy has been Margaret Healy's evening companion for most of Lucy's life.

34. Lucy has been Margaret Healy's night-time companion for most of Lucy's life.

35. Lucy and Margaret Healy are generally together 24 hours a day, seven days a week.

36. Lucy and Margaret Healy are generally together 24 hours a day, seven days a week for most of Lucy's life.

37. Margaret Healy provides excellent care for Lucy.

38. Lucy has prospered living with and being in Margaret Healy's loving care and home.

39. Margaret Healy has provided excellent care to Lucy for most of Lucy's life.

40. Lucy is known in and around the community to be Margaret Healy's companion.

41. Lucy looks to Margaret Healy for direction, as her companion, owner and/or master.

42. Margaret Healy feeds Lucy all her meals.

43. Margaret Healy has always fed Lucy all her meals throughout most of Lucy's life.

44. Margaret Healy keeps Lucy clean and in excellent health.

45. Margaret Healy has kept Lucy clean and in excellent health for most of Lucy's life.

46. Nobody has cared for Lucy other than Margaret Healy for most of Lucy's life.

47. Nobody has fed Lucy other than Margaret Healy for most of Lucy's life.

48. Margaret Healy has afforded veterinary care for most of Lucy's life.

49. Nobody other than Margaret Healy has provided veterinary care for most of Lucy's life.

50. Nobody other than Margaret Healy has seen to Lucy's needs, including Lucy's recreational needs and walking needs, for most of Lucy's life.

51. Margaret Healy and Lucy have emotionally bonded.

52. Margaret Healy and Lucy have socially bonded.
53. Margaret Healy has emotional and social attachments and bonds with Lucy.
54. Margaret Healy has seen after all of Lucy's needs for most of Lucy's life.
55. Lucy accepts Margaret Healy as her companion, owner and master for most of  
Lucy's life.
56. Margaret Healy has looked after and ensured Lucy's health throughout most of  
Lucy's life.
57. Margaret Healy never abandoned Lucy.
58. Margaret Healy never lost Lucy.
59. Margaret Healy never abused Lucy.
60. Lucy is in Margaret Healy's custody.
61. Lucy has been in Margaret Healy's custody for most of Lucy's life.
62. Margaret Healy owns Lucy.
63. Lucy is Margaret Healy's companion.
64. Margaret Healy is Lucy's companion.
65. Margaret Healy has trained Lucy over most of Lucy's life.
66. Lucy has been trained and/or educated by Margaret Healy.
67. Lucy obeys Margaret Healy.
68. Margaret Healy provides a stable environment for Lucy.
69. Margaret Healy has provided Lucy with a stable environment for most of Lucy's  
life.
70. Margaret Healy is and has been an excellent companion, owner and/or master to  
Lucy.

71. Margaret Healy has and, at all relevant times, will always provide a stable environment for Lucy.

72. Margaret Healy has and, at all relevant times, will have the financial means to care for and provide a stable environment for Lucy.

73. On Friday, September 16, 2011, Ms. McCarthy called Margaret Healy.

74. On Friday, September 16, 2011, Ms. McCarthy called Margaret Healy and left a voice mail message on Margaret Healy's home telephone answering machine.

75. On Friday, September 16, 2011, Ms. McCarthy left a voice mail message for Margaret Healy on Margaret Healy's home answering machine that was threatening, foul, abusive, replete with curses, hatred and intimidation.

76. Complaint Report No. 5013 was taken by the Police Department at the 54th Precinct, 301 Gold Street, by Police Officer Simlet, Shield # 29374. A true and accurate copy of the complaint is attached as Exhibit 3.

77. The crime charged is aggravated harassment.

78. A true and accurate copy of the transcription of the threatening and intimidating voice mail message left by defendants is attached as Exhibit 4.

79. Ms. O'Hanlon and Ms. McCarthy then escalated their campaign of threats and intimidation against Margaret Healy.

80. On Friday, September 16, 2011, Ms. McCarthy and Ms. O'Hanlon physically and personally accosted, threatened and intimidated Margaret Healy at Margaret Healy's home.

81. Ms. McCarthy and Ms. O'Hanlon misrepresented and lied to Margaret Healy's doorman telling him that they had an "appointment" with Margaret Healy.

82. Ms. McCarthy and Ms. O'Hanlon never had an appointment to meet with Margaret Healy on Friday, September 16, 2011.

83. Ms. McCarthy and Ms. O’Hanlon called the Police on Friday, September 16, 2011.

84. The Police came to Margaret Healy’s residence on Friday, September 16, 2011.

85. The Police refused to force Margaret Healy to allow or permit defendants entrance or access to Margaret Healy’s residence.

86. Ms. McCarthy and Ms. O’Hanlon then escalated their campaign of threats and intimidation against Margaret Healy.

87. On Friday, September 16, 2011, Ms. McCarthy deliberately and recklessly drove after Margaret Healy in “road rage,” against Margaret Healy.

88. Ms. McCarthy drove perilously close to Margaret Healy threatening and intimidating her with Ms. McCarthy’s huge SUV.

89. Margaret Healy was, at all relevant times, threatened and intimidated, and drove to the Police Precinct whereupon Ms. McCarthy drove off.

90. A temporary restraining order and Court-Order of protection is necessary to protect Margaret Healy, and her husband and her dog Lucy against the defendants during the pendency of this lawsuit.

AS AND FOR A FIRST CAUSE OF  
ACTION A TEMPORARY  
RESTRAINING ORDER

91. Plaintiff repeats, reiterates, realleges and incorporates-by-reference each and every averment contained in ¶¶ “1” through “90,” with the same force and effect as if actually and fully set forth herein.

92. That the Court is, respectfully, requested to grant plaintiff a temporary restraining order against the defendants enjoining or restraining them from further taking any action to take custody and/or possession of Margaret Healy’s dog Lucy and threatening and/or intimidating



Margaret Healy and/or her husband, and from being in and around plaintiff's residence and neighborhood of Brooklyn Heights, New York.

AS AND FOR A SECOND CAUSE OF  
ACTION FOR AN ORDER OF  
PROTECTION

93. Plaintiff repeats, reiterates, realleges and incorporates-by-reference each and every averment contained in ¶¶ "1" through "92," with the same force and effect as if actually and fully set forth herein.

94. That the Court is, respectfully, requested to grant plaintiff an order of protection against the defendants enjoining or restraining them from further taking any action to take custody and/or possession of Margaret Healy's dog Lucy and threatening and/or intimidating Margaret Healy and/or her husband, and from being in and around plaintiff's residence and neighborhood of Brooklyn Heights, New York.

AS AND FOR A THRID CAUSE OF  
ACTION FOR DECLARATORY  
JUDGMENT

95. Plaintiff repeats, reiterates, realleges and incorporates-by-reference each and every averment contained in ¶¶ "1" through "94," with the same force and effect as if actually and fully set forth herein.

96. That the plaintiff be granted a declaration that plaintiff is the rightful sole owner of her dog Lucy and that defendants have no rights.

AS AND FOR A FOURTH CAUSE OF  
ACTION FOR MONETARY DAMAGES

97. Plaintiff repeats, reiterates, realleges and incorporates-by-reference each and every averment contained in ¶¶ "1" through "96," with the same force and effect as if actually and fully set forth herein.

98. That defendants committed repeated aggravated harassment, threats and intimidation against the plaintiff.

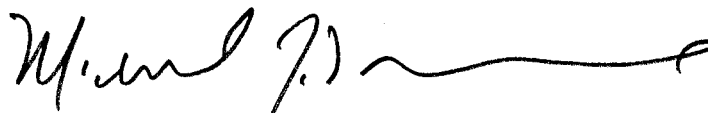
99. The defendants put plaintiff in fear for her safety; the safety of her husband and; the safety of her dog, Lucy.

100. The defendants proximately caused plaintiff monetary damages, including punitive damages, of no less than \$500,000.00.

101. The relief herein requested has not been previously made to the Court and/or any other Court or Judge.

WHEREFORE, the Court is respectfully requested to grant plaintiff judgment, together with such and other and further relief as is just and proper in the Court.

Dated: September 22, 2011  
New York, New York



Michael J. Devereaux, Esq.  
DEVEREAUX BAUMGARTEN  
Attorneys for Plaintiff MARGARET HEALY  
39 Broadway, Suite 910  
New York NY 10006

TO: SUSAN McCARTHY O'HANLON  
39-23 213th Street, #2F  
Bayside, New York 11361-2054

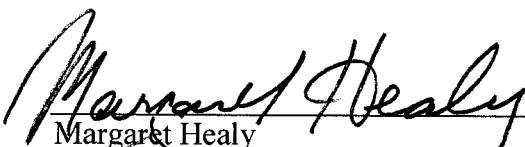
SLANEY O'HANLON  
39-23 213th Street, #2F  
Bayside, New York 11361-2054

CLIENT VERIFICATION


STATE OF NEW YORK            )  
  ) ss:  
COUNTY OF NEW YORK        )

Margaret Healy being duly sworn, deposes and says:

I have read and know the contents of the foregoing complaint. The same is true to my knowledge, except as to those matters therein stated to be alleged upon information and belief and as to those matters, I believe them to be true. `

  
\_\_\_\_\_  
Margaret Healy

Sworn to before me this  
22 day of September 2011

  
\_\_\_\_\_  
Notary Public

**MICHAEL J. DEVEREAUX**  
Notary Public, State of New York  
No 4949064  
Qualified in Nassau County  
Commission Expires March 6, 2015

## **Exhibit 1**

**You have successfully purchased a license with the Dog Licensing System!**  
**Your Confirmation Number is: 459407**

The following is your dog's license number which will appear on the metal tag (for new licenses, otherwise you will only receive a renewal decal) that will be mailed to the registered address. Please print this page as proof of purchase and for future reference. Thank you for using the on-line system and for making your dog legal.

**Confirmation Receipt**

Owner Information				
	Name:	Margaret O Healy		
	Address:	135 Willow Street, 309, Brooklyn, NY 11201		
	Username:	killevy@msn.com		
Purchase Summary				
	Item	License Number	Fee Type	Amount(\$)
1	Lucy (11/2008)	3070403	1 Year License	\$34.00
2	Donation to Support Dog Care		Donation	\$10.00
3			Credit Card Processing Fee	\$1.25
			Total Paid:	\$45.25

\* You will be receiving your new tag(s) in 4 weeks.

## **Exhibit 2**

**CERTIFICATE OF VACCINATION**

**VETERINARY CLINIC**

Heart of Chelsea Animal Hospital  
257 W 18th St.  
New York , NY 10011  
212-924-6116

**OWNER OF ANIMAL**

Margaret Healy  
135 Willow St. #309  
Brooklyn Heights, NY 11201

This is to certify...

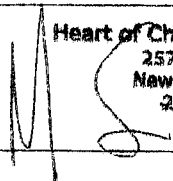
THAT I HAVE VACCINATED AGAINST RABIES THE ANIMAL DESCRIBED BELOW.

**Patient information...**

**PATIENT:** Lucy  
**SPECIES:** Canine  
**BREED:** Goldendoodle  
**SEX:** Spayed Female  
**COLOR AND MARKINGS:** Beige

**TAG NO:** 11006-10  
**WEIGHT:** 62.00  
**AGE:** 18M  
**MICROCHIP:**

Signed \_\_\_\_\_

 Heart of Chelsea Animal Hospital  
257 W 18th Street  
New York, NY 10011  
212 924-6116

Marc Siebert, VMD  
License: 7159

*Date 7-26-10*

**Date of Rabies Vaccination:** 07-26-10 ←  
**Rabies Vaccination Expires On:** 07-25-13

**Rabies Vaccine Information...**

**MFG BY:** PFIZR  
**LOT EXP:** 22FEB11

**SER.NO:** S846249D  
**ADM:** SQRR

## **Exhibit 3**





INCIDENT INFORMATION SLIP  
 PD 301-164 (Rev. 1-97)

ACCIDENT REPORTS GIVEN OUT MON-FRI 10am-2pm \$10 FEE  
 EXCEPT HOLIDAYS MONEY ORDER OR CHECK ONLY

Date: 09/18/11

Welcome to 84 Pct 301 Gold Street (718) 875-6231  
 (Command) (Address) (Telephone No.)

We hope that your business with us was handled satisfactorily. Your particular matter has been assigned the following number:

Complaint Report No.: 5013 Accident Report No.: \_\_\_\_\_ Aided Report No.: \_\_\_\_\_

Reported to: P.O. GIMNET 29394 Date of Occurrence: 09/16/11 Time: 2000  
 (Rank) (Name) (Shield No.)

Location of Occurrence: 11010 135 WILLOW

Crime: AGG. HARASSMENT

Please keep this report should you have to refer to this matter in the future. If you need any further assistance feel free to contact us at telephone number 916 895-6231. Please let us know if you have any suggestions on how we can better serve you. As you may already know, we will provide you with a crime prevention survey of your residence or business. Please ask for more information on this and other crime prevention initiatives. Our goal is to make you and your property safe.

COURTESY — PROFESSIONALISM — RESPECT

REMEMBER: CALL "911" FOR EMERGENCIES ONLY!!!!

Agency **NYPD** **NEW YORK STATE DOMESTIC INCIDENT REPORT** Sprint # (NYC) **WAD 91** Incident #

DATES Occurred: Month **09** Day **16** Year **11** Time (24 hrs) **2000** Address of Occurrence **135 WILLIAM ST. BAYRIDGE NY 11201** APT # **307** Precinct (NYC) **0461** Aided # (NYC) **0461** Complaint #

Report: Month **09** Day **18** Year **11** Time **1600**

Officer-Initiated  Radio Run  Walk-In

VICTIM/PARTY (P1) Name (Last, First, M.I.) / (include aliases) **HEALY MARGARET P** DOB **06 01 1973** Age **38**  Male  Female

If non-English, language:  Spanish  Chinese  Other:

Injured?  No  Yes Removed to Hospital?  No  Yes If yes, what hospital?  White  Black  Asian  Hispanic  Native American  Other:  Non-Hispanic  Unknown

SUSPECT / PARTY (P2) Name (Last, First, M.I.) / (include aliases) **MCCADAMPT SUBJECT** Phone **516 507-4211** DOB **06 16 1976** Age **35**  Male  Female

Street & City **3921 213th St BAYRIDGE NY** APT # **11361** Zip **11361** If non-English, language:  Spanish  Chinese  Other:

Injured?  No  Yes Removed to Hospital?  No  Yes If yes, what hospital?  White  Black  Asian  Hispanic  Native American  Other:  Non-Hispanic  Unknown

SUSPECT/P2 **present?**  Yes  No

**LIVING SITUATION** Do parties currently live together?  Yes  No IF NO, have they lived together in the past?  Yes  No Do the parties have a child-in-common?  Yes  No

**RELATIONSHIP: (SUSPECT / P2 to VICTIM / P1)**  Married  Formerly Married  Intimate Partner/Dating  Former Intimate/Dating  Child of victim/party 1  Parent of victim/party 1  Relative: **EX LAW**  Other:

Prior DV History?  Yes  No Prior DV police report?  Yes  No Victim fearful?  Yes  No Access to weapons?  Yes  No Suspect: Drug/Alc History?  Yes  No Suspect: Hx suicide threat?  Yes  No Suspect: Probation/Parole?  Yes  No

ASSOCIATED PERSONS

SUSPECT ACTIONS (Check all that apply)

- Biting
- Destroyed Property (Estimated \$ \_\_\_\_\_)
- Forced Entry
- Forcible Restraint
- Hair Pulling
- Homicide
- Impaired Alcohol/Drugs
- Injury to Child
- Injury to Other Persons
- Injury to Pet/Animal
- Interference with Phone
- Intimidation/Coercion
- Kicking
- Punching
- Pushing
- Sexual Assault
- Shooting
- Slapping
- Slamming Body
- Stabbing
- Strangulation/"Choking"
- Suicide or Attempt
- Threw Items
- Unwanted Contact
- Verbal Abuse
- Violated Visitation/Custody Conditions
- OTHER Suspect Actions: \_\_\_\_\_
- Threats: (specify)  Injure/Kill Persons  Injure/Kill Self  Injure/Kill Pet/Animal  Take Child  Destroy/Take Property  Other: **FAKE PPT**
- Threat with weapon  Weapons used: (specify)  Blunt Object  Gun  Motor Vehicle  Sharp Instrument  Other: \_\_\_\_\_

ARREST MADE?  Yes  No Arrest # \_\_\_\_\_

Reasons arrest not made on-scene:  No Offense Committed  No Probable Cause  Suspect Off-Scene

Warrant/Criminal Summons to be requested  Violation level: not in police presence (no citizen's arrest)  Other:

Offenses	Law (e.g. PL)	Section (Sub)	Charges Filed	Offenses Involved: (check all that apply)
1. <b>HARRASSMENT</b>	<b>246</b>		<input type="radio"/>	<input checked="" type="radio"/> Misdemeanor <input type="radio"/> Violation <input type="radio"/> Other (Specify) _____
2.			<input type="radio"/>	Registry Checked? <input type="radio"/> Yes <input checked="" type="radio"/> No OP Court Name: _____
3.			<input type="radio"/>	Order of Protection? <input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Family <input type="radio"/> Criminal <input type="radio"/> Supreme
			<input type="radio"/>	Stay Away Order? <input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Out of State <input type="radio"/> Tribal
			<input type="radio"/>	Order Violated? <input type="radio"/> Yes <input checked="" type="radio"/> No
			<input type="radio"/>	Any PRIOR orders? <input type="radio"/> Yes <input checked="" type="radio"/> No Expiration Date: _____ Month _____ Day _____ Year _____

**STOP! COMPLETE STATEMENT ON PAGE NEXT**

PHOTOS TAKEN?  Yes  No IF YES, photos taken of:  Victim Injuries  Suspect Injuries  Scene  Damaged Property  Other: \_\_\_\_\_

Other evidence collected?  Yes  No IF YES, describe: \_\_\_\_\_

RESULTS OF INVESTIGATION AND BASIS OF ACTION TAKEN. (Were excited utterances, spontaneous admissions or spontaneous statements made?)  Yes  No (Complete 710.30 or other form when applicable).

**911K CIV SEALS THAT PARTY #02 LEFT A HARRASSING MESSAGE ON CIV HOME PHONE. PARTY #2 THEN SHOWED UP AT CIV RESIDENCE WITH AN ANIMAL AND APPROX 90 MINUTE CIV DID NOT WANT CIV SEALS. PARTY #2 DID NOT LEAVE CIV QUOTE AND HOW BECAUSE CIV DID NOT WANT. ALSO - PARTY #2 FORCED HIS WIFE CIV TO SIGN A STATEMENT FOR THE POLICE. PARTY #2 THEN FLEW HOME AFTER CIV EMERGENCY CALL. ALL OF THIS OCCURRED ON 09/16/11 CIV SEALS THAT THERE ARE NO CIVIL SEALS FOR CIV HOME, BUT CANNOT TELL IF ANY MORE FOR PARTY #2 CIVILIAN.**

OTHER AGENCIES involved with the parties or incident (e.g. advocates, hospital, probation): \_\_\_\_\_

Is there reasonable cause to suspect a child may be the victim of abuse, neglect, maltreatment or endangerment?  Yes  No IF YES, officer must contact the NYS CHILD ABUSE HOTLINE REGISTRY # 1-800-635-1522

Guns in House  Guns Seized  Has Permit  Permit Seized Issuing County: \_\_\_\_\_

Permit #(s): \_\_\_\_\_ Name on Permit(s): \_\_\_\_\_

CONTACTS INITIATED BY POLICE:  Adult Protective Services  Child Protective Services (or ACS)  Domestic Violence Services  Firearms Licensing

Sprint # (NYC)

Incident #

Precinct (NYC) CTY

Aided # (NYC)

Complaint #

Page 2 of the NYS Domestic Incident Report: STATEMENT OF ALLEGATIONS / SUPPORTING DEPOSITION

Suspect Name (Last, First, M.I.)

I, MARGARET HEALY (victim/deponent name), state that on 9/16/11, (date) at 8pm Yo, (nombre de victima/deponente), declaro que en tal fecha en

(location of incident), in the County/City/Town/Village of Brooklyn, of the state of New York, the following did occur: (donde el incidente ocurrio), el condado/ciudad/aldea/pueblo de, del estado de Nueva York, lo siguiente ocurrio:

My sister-in-law Susan Mc CARTHY O'HANLON left a dreadful voice mail message on my phone demanding the return of a dog that my brother gave me 2 years ago, after she + her daughter abandoned it in the house with my brother. He owned the dog and gave it to me in late 2009.

LATER Friday evening she and her daughter arrived in my lobby demanding that the doorman let them in which he didn't, saying that they came for the dog according to arrangement - untrue! When I thought she was gone I went out in car to find my husband + dog to drive back. She appeared in SUV + followed me around the block. When I stopped again at front door she flew out of car to come up to me, shouting "bitch" etc + I drove away. She followed close all the way to police station + parked behind me, but did not follow me in. I was sure she was going to hit my car as she was always erratic. There is an ongoing over 2yr divorce and I was never frightened in my life.

False Statements made herein are punishable as a Class A Misdemeanor, pursuant to section 210.45 of the Penal Law. Declaraciones falsas hechas aqui son castigables como una clase de delito menor, de acuerdo con la seccion 210.45 de la ley penal.

Victim/Deponent Signature Firma de victima/deponente

Date Fecha

Interpreter

Date

Note: Whether or not this form is signed, this DIR form will be filed with law enforcement. Nota: Si esta forma esta firmada, o no, esta DIR forma sera registrada con la policia.

## **Exhibit 4**

**Transcription of Voice Mail Message left by Susan McCarthy O'Hanlon (516-507-4211) on 9-16-2011 at about 1:05 PM on home telephone of Margaret and Walter Healy at 718-625-6631**

Yeah, this is Susan McCarthy. And I've just been informed that my dog [Lady] died this morning - my daughter's dog. And I want to know why the two of you did not let us know that this dog was sick. You have no fucking heart. My daughter has not seen her dog since you took her. How you can sleep at night is beyond me. And I want Lucy [the dog still living] back immediately. How could you fucking do this to us? You Bitch!

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

-----X  
MARGARET HEALY,

Index No.:

plaintiff,

- against -

SLANEY O'HANLON and SUSAN McCARTHY,

defendants,

-----X

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**SUMMONS and VERIFIED COMPLAINT with EXHIBITS 1 – 4**

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**DEVEREAUX BAUMGARTEN**

39 BROADWAY, Suite 910  
NEW YORK, NEW YORK 10006  
TEL. (212) 785-5959 (T) / FAX (212) 785-4487 (F)