

BEFORE THE BOARD OF COUNTY COMMISSIONERS
FOR COLUMBIA COUNTY, OREGON

In the Matter of the Livestock Attack by)
Two Dogs Owned by Ashley Webster and) ORDER NO. 78-2025
Jed Kanooth)

WHEREAS, November 6, 2025, Columbia County Animal Control received a report of a livestock attack at 74289 Fern Hill Road, Rainier, Oregon by two dogs owned by Ashley Webster and Jed Kanooth (the "Owners"), who reside on Beaver Springs Road, Rainier, Oregon, said dogs described as a yellow Lab and a St. Bernard with the names of "Siggy" and "Rollo" (the "Dogs"); and

WHEREAS, on November 6, 2025, Community Animal Officer ("CAO") Keeanna Stansbury responded to the report, visited the residence on Fern Hill Road where the attack was reported to have occurred, found the Dogs there and secured them; and

WHEREAS, while at the Fern Hill Road residence, CAO Stansbury ascertained that the Dogs had chased several turkeys and severely injured one turkey, which injuries ultimately led to the death of that turkey; and

WHEREAS, while at the Fern Hill Road residence, CAO Stansbury took photographs of the turkey and the area where the attack was reported to have occurred; and

WHEREAS, CAO Stansbury spoke with Christina Keith, owner of the turkey; and

WHEREAS, CAO Stansbury spoke with Ashley Webster, one of the Owners of the Dogs, and served an impound notice of her; and

WHEREAS, CAO Stansbury has completed an Incident Report, attached hereto as "Exhibit A" (the "Incident Report"); and

WHEREAS, in accordance with ORS 609.156, on November 24, 2025, the County duly provided Ashley Webster and Jed Kanooth with notice of the opportunity to request a hearing within 14 days of the date that said notice was sent to by the County; and

WHEREAS, on December 2, 2025, the County received a written request for a hearing on the matter; and

WHEREAS, on December 4, 2025, a hearing on the matter was scheduled for December 17, 2025, and notice of the scheduled hearing was duly sent to the Owners; and

WHEREAS, at the request of Ashley Webster, the hearing was moved from December 17, 2025 to December 23, 2025 and notice of the new hearing date was duly sent to the Owners; and

WHEREAS, on December 23, 2025, the Board of Commissioners (the “Board”) conducted a hearing on the matter in accordance with ORS 609.158; and

WHEREAS, prior to the hearing, CAO Stansbury provided the Board of Commissioners (“Board”) with a list of recommendations, included recommended findings, attached hereto as “Exhibit B” (the “Recommendations”); and

WHEREAS, CAO Stansbury recommended the Board find that neither of the Dogs have a previous history of chasing, harming or killing livestock; and

WHEREAS, CAO Stansbury recommended that the Board of Commissioners Board impose a civil penalty of \$500.00 under ORS 609.162(1)(c) for the killing of livestock by “Rollo” and require that “Rollo” either be removed to a location where, in the opinion of Animal Control, it will no longer present a threat to livestock, or alternatively require that the dog be put to death in a humane manner; and

WHEREAS, CAO Stansbury has recommended that the Board of Commissioners Board impose a civil penalty of \$500.00 under ORS 609.162(1)(c) for the killing of livestock by “Siggy” and require that “Siggy” either be removed to a location where, in the opinion of Animal Control, it will no longer present a threat to livestock, or alternatively require that the dog be put to death in a humane manner; and

WHEREAS, CAO Stansbury initially recommended enhancing the penalty for each of the Dogs in accordance with ORS 609.163(3) for the failure to license the dogs, but at the hearing withdrew said recommendation of enhanced penalties under ORS 609.163(3) for either of the Dogs; and

WHEREAS, CAO Stansbury recommended that the Board require payment of the boarding and impound fees, including the County’s standard \$30.00 impound fee and the standard \$20.00 per day boarding fee each of the Dogs; and

WHEREAS, the Board of County Commissioners has considered CAO Stansbury’s Incident Report on this matter, along with CAO Stansbury’s Recommendations;

NOW, THEREFORE, based on the evidence presented, including Exhibit A, Exhibit B, the other contents of the record compiled for this matter, and the above recitals, the Board of County Commissioners makes the following findings and conclusions:

1. On November 6, 2025, “Rollo” and “Siggy”, while at large and off of the property where they reside, chased several turkeys and attacked one turkey, the injuries from which ultimately led to the death of said turkey, owned by Christina Keith who resides at 74289 Fern Hill Road Rainier, Oregon.
2. Neither “Siggy” nor “Rollo” has a previous history of chasing, harming or killing livestock.

3. Ashley Webster and Jed Kanooth are the owners of "Siggy" and "Rollo" and were sent notice of their right to request a hearing, as required by ORS 609.156.
4. Ashley Webster, as owner of "Rollo" and "Siggy", duly requested a hearing in accordance with ORS 609.156.
5. Based on observations of CAO Stansbury, summarized in Exhibit A, the Board finds that both "Rollo" and "Siggy" present a continuing threat to livestock but that both "Rollo" and "Siggy" would be valid candidates for processing by the Animal Control shelter for re-adoption.
6. A hearing was conducted at the request of Ashley Kanooth on December 23, 2025, in accordance with ORS 609.158, where the Board developed a record of the proceeding showing a full and fair inquiry into the facts necessary to determine the matter alleged.
7. Pursuant to ORS 609.125, turkeys are "livestock".

NOW, THEREFORE, IT IS HEREBY ORDERED based on the foregoing and the record before the Board of Commissioners:

1. Pursuant to ORS 609.162(1)(c), a civil penalty of \$500.00 is hereby imposed for "Rollo's" involvement in the killing of the turkey owned by Christina Keith.
2. Pursuant to ORS 609.162(1)(c), a civil penalty of \$500.00 is hereby imposed for "Siggy's" involvement in the killing of the turkey owned by Christina Keith.
3. Impound fees of \$60.00 and boarding fees in a reduced amount totaling \$1,100.00 for boarding of the dogs from the date of impound to the date of this Order, is hereby imposed for the impound and boarding of "Rollo" and "Siggy" by Columbia County Animal Control.
4. Restitution in the amount of \$25.00 is hereby imposed and shall be paid to Christina Keith by Ashley Webster and Jed Kanooth for the killing of Christina Keith's turkey by "Siggy" and "Rollo".

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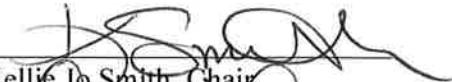
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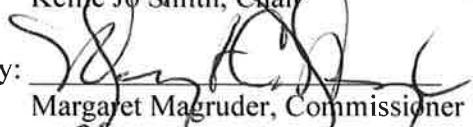
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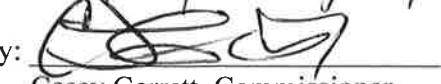
5. Within 30 days of the date of this Order, the Owners of "Rollo" and "Siggy" shall either identify a location where the Dogs will be permanently removed where the Dogs will not pose a threat to livestock, or alternatively surrender the dogs to Columbia County Animal Control for re-adoption. Any location recommended by the Owners shall be subject to the review and approval of CAO Stansbury. The Dogs shall not be permitted to live anywhere on Beaver Springs Road or Fern Hill Road. Boarding fees, above and beyond the \$1,100.00 in boarding fees imposed above, shall continue to accrue for each of the Dogs at Columbia County Animal Control's standard boarding rates during this 30 day period. If, after 30 days, no suitable alternative location has been identified, or the Owners have not surrendered the Dogs to Columbia County Animal Control for re-adoption, the Dogs shall be put to death in a humane manner in accordance with ORS 609.162(1)(c).
6. Prior to the potential relocation or re-adoption of either of the Dogs in accordance with Section 5, above, a Columbia County dog licence shall be obtained and the Dogs shall be microchipped in accordance with ORS 609.168.
7. CAO Stansbury shall cause notice of the civil penalties imposed herein to be provided to the Oregon Department of Agriculture in accordance with ORS 609.166.

DATED this 30 day of December, 2025.

BOARD OF COUNTY COMMISSIONERS
FOR COLUMBIA COUNTY, OREGON

By: 
Kellie Jo Smith, Chair

By: 
Margaret Magruder, Commissioner

By: 
Casey Garrett, Commissioner

Approved as to form

By: 
Office of County Counsel



Exhibit A

COLUMBIA COUNTY
NOV 13 2025
COUNTY COUNSEL

Incident Report

Case# 250053643	Report Date 11/13/2025	Author Keeanna Stansbury	Unit/DPSST 149
Location of Incident 74289 Fern Hill Rd.		City Rainier	County Columbia
Offense Chasing or Harming Livestock		Related Cases ORS 609.155	

Mentioned:

Victim: Christina Keith 360-430-0210
74289 Fern Hill Rd.
Rainier, Oregon 97048

Reporting Party: Gary Newberry 503-298-1545
Fern Hill Rd
Rainier, Oregon 97048

Dog Owners: Ashley Webster & Jed Kanooth 360-833-3794
Beaver Springs Rd. Rainier, OR 97048
PO Box 1013 Rainier, OR 97048

Dogs: Siggy, female Saint Bernard, white and brown
Rollo, male labrador retriever mix, yellow/tan/apricot

Sheriff's Deputy: Kyle Johnson 971-290-9262

Summary:

On 11/6/2025, at approximately 3:17 pm, I arrived at 74289 Fern Hill Rd. in Rainier in response to a livestock attack. There were two dogs described as a Saint Bernard and a yellow lab that were reported to have killed livestock. These dogs were running loose on the property, I secured them in the vehicle, located an injured turkey, and contacted Christina Keith, who owns the turkeys, on the phone. The owner of the dogs, Ashley Webster, came to the property and I served an impound notice for the dogs.



Incident Report

Narrative:

On 11/6/2025, at approximately 3:17pm, I responded to a dog(s) attacking livestock complaint at 74289 Fern Hill Rd. in Rainier. Upon arrival, I observed two dogs running back and forth from the 74289 Fern Hill Rd property and the roadway. I turned my vehicle lights on, parked on the shoulder and got out of the vehicle to catch the dogs. As I approached the dogs, I noted that I recognized these dogs to be Siggy, a white and brown St. Bernard, and Rollo, a yellow labrador. I approached them in the roadway and corralled them off the road. I gave Rollo the command to load up and he hopped into the back of the truck. I then attempted to give the same command to Siggy and she did not get into the truck. With a little persuasion, I was able to get a slip on her and secure her in the truck as well.

Once the dogs were secured, I moved further into the driveway at 74289 Fern Hill Rd. I knocked on the door in attempt to contact the owner, but no one was home. I left a card and observed several geese on the front porch. In my vehicle, I contacted Gary Newberry, who told me that the property owner is Christina Keith, and she is not home. Gary Provided Christina's contact information. At that time, a large white dodge truck pulled into the driveway. Ashley Webster, the owner of Siggy and Rollo, had come to find her dogs. I recognized Ashley as the owners due to a previous redemption from the shelter of Siggy and Rollo. Ashley told me that she was exchanging Facebook messages with Christina. Ashley said she was aware that her dogs were chasing livestock, and that Christina was asking for compensation of damages to livestock. At this time, I informed Ashley that the dogs have been impounded under ORS 609.155 for dogs chasing or harming livestock. I served her an impound notice and informed her that the dogs will be held at the shelter until a determination has been made by the Board. I further advised that she will be receiving a packet in the mail from the county attorney on the next steps.

At approximately 3:38 pm, I moved my vehicle to the other side of the driveway where I observed a turkey lying in the yard. I observed that the turkey was shaking and showing signs of life. I further observed that the majority of the feathers were plucked from the turkey's body, the turkey's neck appeared broken, and there many red marks present all of the turkey's skin. I observed at least 3 puncture wounds consistent with a dog's canine as well as an approximately 4 inch long and 2-inch-wide laceration on the turkey's left ribcage. The laceration exposed the muscle underneath the skin. Additionally, at the bend in the left wing there appears to be chew marks due to the presence of redness, blood, and small wounds. Photos below indicate the injuries sustained to the turkey. Additionally, there is a short video of the turkey that will be included.



Incident Report

Photos below are at 74289 Fern Hill Rd. in Rainier of the incident. Source: Keeanna Stansbury





Incident Report





Incident Report





Incident Report





Incident Report





Incident Report





Incident Report





Incident Report





Incident Report

Photos below are at 74289 Fern Hill Rd. in Rainier of the incident. Source: Gary Newberry.



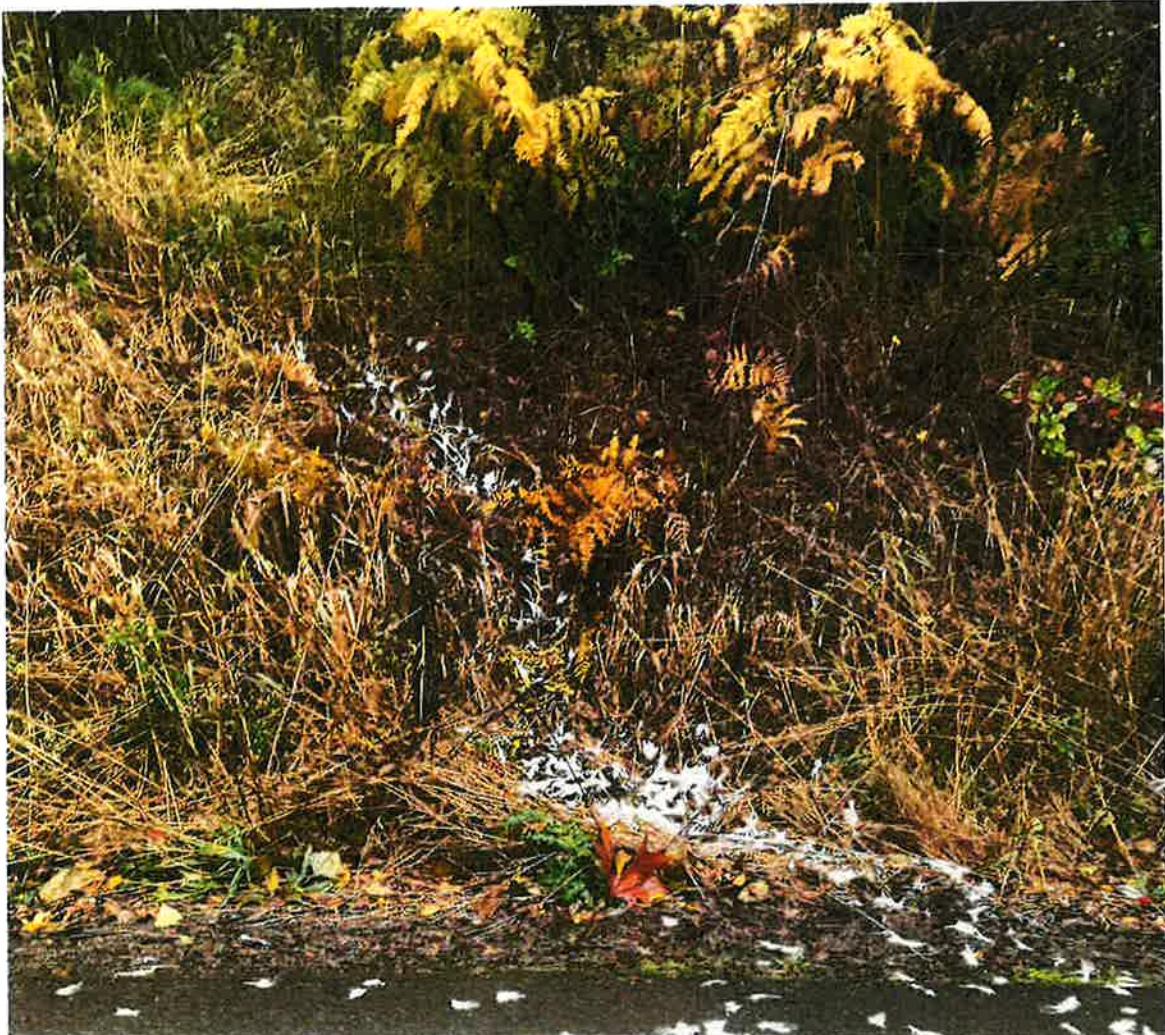


Incident Report





Incident Report



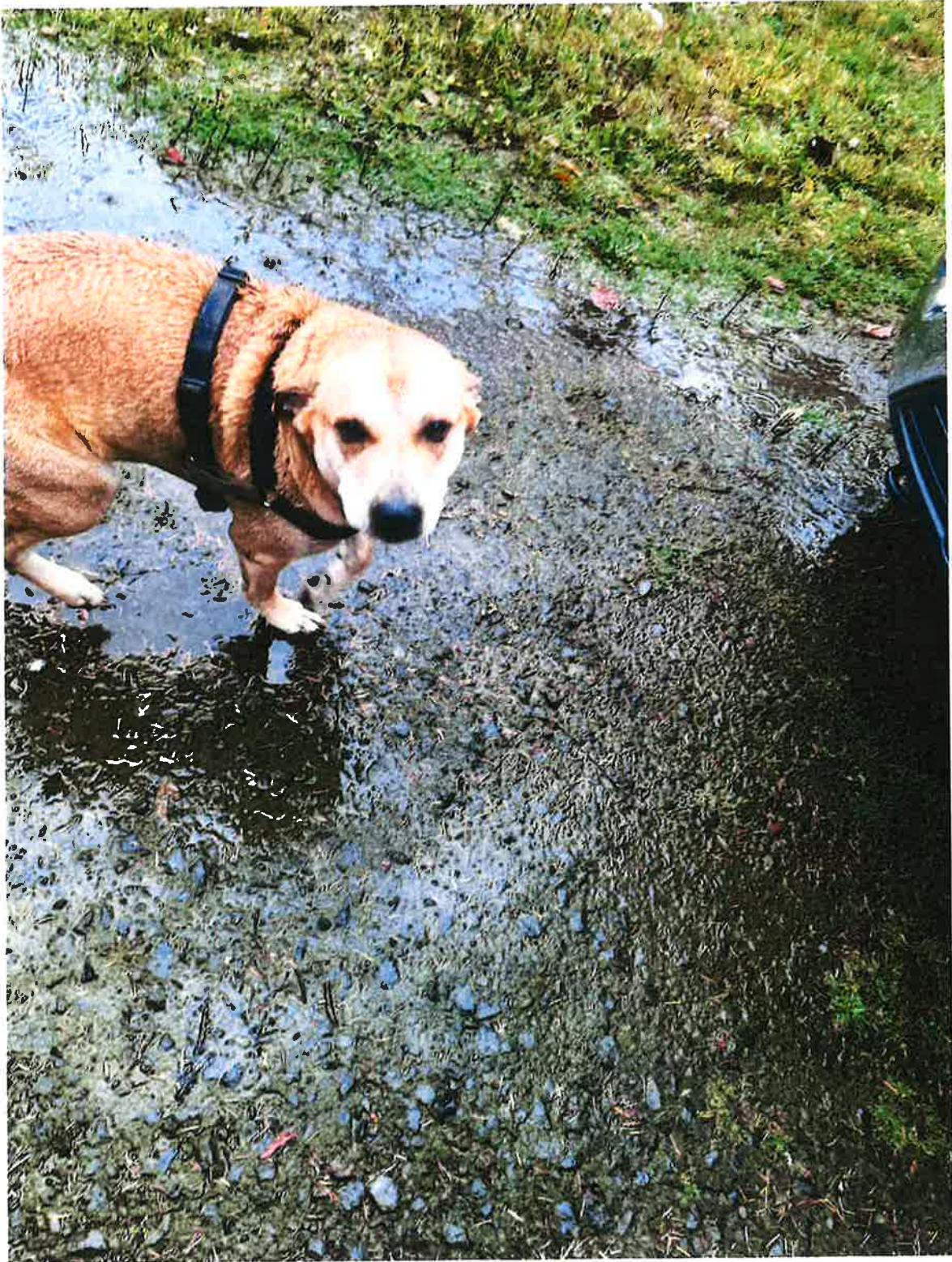


Incident Report





Incident Report





Incident Report

I contacted Christina Keith on the phone at approximately 3:31 pm and informed her of the condition of the turkey. I told Christina that I can only find 2 of the 4 turkeys she said she had. Christina provided consent for me to go on the property and see if I can find the other 2 turkeys. Deputy Johnson arrived at approximately 3:40 pm. Based on the conditions of the turkey, I asked if Christina would allow us to dispatch the turkey as it was suffering. Christina consented to dispatching the turkey and advised that I could place it in a bag and leave it on the front porch for her. Deputy Johnson dispatched the turkey at approximately 3:46 pm.

Deputy Johnson and I then walked around the right side and to the back of the house in an attempt to locate the 2 missing turkeys. After a few minutes, we were able to locate all the turkeys, none of which appeared to have sustained any injuries during the incident.

After the rest of the turkeys were located, I transported the two dogs, Siggy and Rollo, to the shelter where I placed them in an isolation kennel.

On 11/13/2025, at approximately 11:25 am, I contact Gary Newberry who reported this incident. Gary told me that he was driving home past Christina's house and saw the two dogs thrashing over the turkey. Gary pulled in and yelled at the dogs to go away and get off the property. Gary said they chased another turkey then he was able to get them off the property. He notified Christina of the incident. Gary told me that he did get a video of the attack and will be providing the video to me via text message.

On 11/13/2025, Christina told me that the other 3 turkeys were unharmed. Christina told me that she purchased the turkey eggs for \$10 but advised that the adult birds are worth between \$75 to \$100 because of the rare color. Included with this report are copies of several websites selling this type of turkey or similar. The price for a turkey is estimated to be \$17.99 to \$22.00 while a turkey egg is estimated to be around \$8.00.

Action Taken:

Ashley Webster was served an impound notice per ORS 609.155 dogs chasing or harming livestock and advised that she will be receiving a packet in the mail from the County Attorney regarding the next steps. Christina Keith would like to submit restitution for the loss of her turkey. Report is being sent to the County Attorney.

Respectfully Submitted

Keeanna Stansbury
Community Animal Officer
Columbia County Animal Control

**ANIMAL CONTROL****Animal Intake Form**

CAD# 250053643

DATE: 11/6/2025

Shelter ID# 25-245 & 246

FINDER'S INFORMATION:

Name:	Address	Phone:
Location found:		

ANIMAL INFORMATION:

Name	Description (Breed, color, sex)	Tags/chip identifiers
#1 Sigg	St. Bernard White & Bro	
#2 Rollo	Labrador Mix Yellow	
#3		

OWNERS INFORMATION:

Name: Ashley Webster	Address: PO Box 1013 Rm 201	Phone: 360-833-3794
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REASON FOR IMPOUND: Check all that apply. See reverse side for details.

Stray or at large	Nuisance	Quarantine rabies	Neglect/police holds	Owner surrender	Owner arrest	Livestock attack <input checked="" type="checkbox"/>
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ANIMAL BEHAVIOR INFORMATION: Medical, Bite, Aggression, or other issues.

Attacked turkey

OFFICER HOLD: DO NOT RELEASE:

<input checked="" type="checkbox"/> / NO	Livestock attack hold
--	-----------------------

OWNER SURRENDER: I understand that by signing this release that I am:

The owner or lawful keeper of the animal and have the right to make decisions for the animal.

Giving up my ownership/rights/custody to the above described animal.

Transferring all possession rights to the animal to Columbia County.

Acknowledging that I may be billed fees for the surrender, impound and/or quarantine of the animal by the County.

Acknowledging that the surrender of the animal does not preclude the County from taking enforcement action against me.

Acknowledging that the animal may be euthanized without additional notification.

Signature

Date

Officer Stansbury	Radio # 149	Date 11/6/2025	Time 1524
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WHITE: Shelter inbox

CANARY: Place on kennel gate



COLUMBIA COUNTY SHERIFF'S OFFICE

Brian E. Pixley, Sheriff

ANIMAL CONTROL WARNING NOTICE

- ORS 609.060 Running at large. A dog being off the property of the owner.
 - Trespassing upon the property of another person.
 - Damaging or destroying property of another person.
 - Disturbing any person by frequent or prolonged noise (barking)
 - Chases person or vehicles while off property of owner.
 - Causes physical injury to a person (Bite)
 - Menaces another person by lunging, growling, snarling or other behaviors that place Person in fear for their personal safety.
- ORS 609.100 Unlicensed and or unvaccinated dog.
- ORS 167 Animal Abandonment and/or neglect allegations.
 - Please call animal control office at 503-366-4614 upon receipt of this notice and leave a message advising receipt of this notice. This is a **time sensitive notice** and delays in response may result in seizure of the animals and charges being filed.
- ORS 609.090 Notice of animal impoundment
 - A release for the animal must be obtained by contacting the Sheriff Office front desk located at 901 Port Ave Saint Helens Oregon.
 - To discuss redemption of the animal, you will need to contact the Animal Control Officer by contact dispatch at 503-397-1521.

Location posted:

Given to Ashley Webster

Officer:

Stansbury

Date:

11/6/05

Time:

1524

CAD:

250053643

*PO 1013 Rainier, OR
97048*

Home (/index.html) > Turkeys (turkeys.html) > Turkeys for Sale (turkeys-for-sale.html) > Blue Slate Turkeys

Customer Reviews

(0) (#see_review)

[Post A Review of Blue Slate Turkeys](#)



Breed Photo Gallery
(/breed_gallery.html?breedid=683)

Blue Slate Turkeys

Free Shipping on All Orders!

Sex	Order	1 to 15	16 to 63	64+
Unsexed	<input type="checkbox"/>	\$22.00	\$18.00	\$16.00

[ADD TO CART](#)

As the name suggests, Blue Slate turkeys are easily recognized by their slate-blue feathers that range from light gray to a deep, smoky blue. They are a medium-sized turkey with a calm demeanor and excellent foraging ability.

Toms weigh 20-23 pounds, and hens weigh 12-14 pounds, and they are hardy, active, and well-suited for free-range living. They produce high-quality, flavorful meat and are excellent layers making them popular among farmers and turkey enthusiasts.

[More info \(#MoreInfo\)](#)

Availability (#tabDesc)

[Click Here For All Breeds Available Now \(/available.html\)](#)

	Mar 9	Mar 16	Mar 23	Mar 30	Apr 6	Apr 13	Apr 20	Apr 27	May 4	May 11	May 18	May
Unsexed	●	●	●	●	●	●	●	●	●	●	●	●

● Available

● Not Available

● Limited Availability (<10 birds)

More Info (#MoreInfo)

Blue Slates have a long history in American farming due to their adaptability, hardiness, and ability to thrive in a variety of climates and environments.

Whether you are raising them for their meat, eggs, or beauty, Blue Slate turkeys are a great addition to any flock.

Customer Reviews of Blue Slate Turkeys

There are no reviews of Blue Slate Turkeys yet. Be the first to review! (#)

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BLUE SLATE HERITAGE DAY OLD TURKEY POULTS

 3.9 [▼](#) 9 reviews

SKU BLUSS

\$20.00

PayPal Buy now, pay later. [! Details](#)**Gender** STRAIGHT RUN

201 available

QUANTITY: [ADD TO BAG](#)**Product Details**

Blue Slate Heritage Day Old Turkey Poulets

The Blue Slate turkey is a rare heritage turkey breed that was admitted into the American Standard of Perfection in 1874. Originally believed to be a cross between a black and white turkey, it is now believed that this type arose as a

Buy more, save more

Quantity	Price per item	Discount
16 items	\$18.50	8% off
64 items	\$17.00	15% off

legitimate mutation. The Blue Slate turkey makes an excellent forager, backyard/farm turkey, and of course, a great Thanksgiving bird for your table.

Blue Slate turkeys can be varying shades of blue and may have flecks of black throughout. Hens are lighter in color than toms.

Heritage breed turkeys do have a longer grow out period than your Broad Breasted varieties and are typically processed at 24 to 28 weeks.

Average market weight: Toms 23 lbs, Hens 16 lbs. Old Toms 33 lbs, Old Hens 18 lbs.

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More Details

Months Available: March thru August

Purpose: Meat

Process Age (in weeks): 24+ (full mature weight at 18

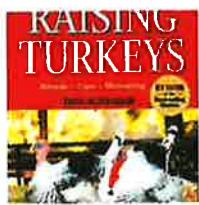
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Breed Availability

Nov 17, 2025	Dec 1, 2025	Dec 8, 2025	Dec 15, 2025
	Straight		
Straight	Run: 0	Straight	Straight
Run: 0		Run: 0	Run: 0
Jan 5, 2026	Jan 12, 2026	Jan 20, 2026	Jan 26, 2026
Straight			
Run: 0	Straight	Straight	Straight
	Run: 0	Run: 0	Run: 0

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Hi. Need any help?





Blue Slate Turkey

★★★★★ (13 customer reviews)

\$17.99

Temporarily Unavailable - More Coming Soon
Notify me when this is available again -

[Email *](#)

Let me know about other specials and promotions.

[Notify Me](#)

- Blue Slate Turkey - Sold as Baby Poulets Only - No Sexing Available

Seasonal/Shipped April thru Late July.

Your total order requires ANY 3 birds to ship.

MAXIMUM OF 40

Breed Facts

Breed Facts

Description

- Poultry Show Class: Turkeys

Video

Reviews (13)

- **Weights:** Hen———14 lbs
Tom———23 lbs
- **Purpose and Type:** Egg Laying and Meat; Exhibition
- **Egg Color:** Off White with brown specks
- **Egg Production:** Poor
- **Egg Size:** Large to Extra Large
- **Temperament:** Active
- **Fertility Percentage:** 60-75%
- **Broody:** Setters
- **Mating Ratio:** 7 Females to 1 Male
- **Roost Height:** 2+ feet
- **Country of Origin:** North America
- **TLC:** Watch Status
- **APA:** Yes, Recognized by the Standard of Perfection in 1874
- **Breeder Farm Source:** "[Cackle Hatchery® Poultry Breeding Farm](#)" developing our bloodline or strain of pure Blue Slate Turkey breed since 1976. .

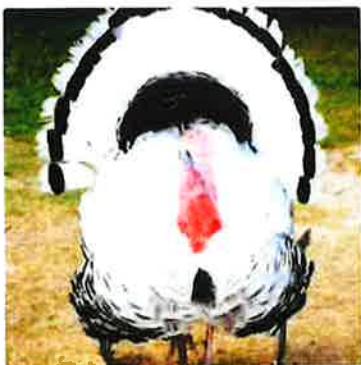
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Choose Your Ship Date Or Date Of Pick-Up

Turkey Hatching Eggs are shipped weekly on Fridays. Eggs are not able to be sexed. During extreme weather, please use your best judgment on deciding whether to have hatching eggs shipped. Read more about our [shipping rates](#) and how we [safely ship](#) our hatching eggs directly to you. Hatching eggs are usually delivered to your address instead of being held at the post office like chicks. Please contact your local post office for more information.

Incubate

After transport, whether picked up at the hatchery or shipped, please let your eggs sit for at least 12 hours before placing them into the incubator. For more information regarding our hatching eggs or tips on successful incubation, check out our help desk article.

Important Ordering Information for All Hatching Eggs

We guarantee that your eggs will arrive unbroken, but will not guarantee your hatching success because of the many variables with shipping, incubating, and hatching. Breakage must be reported upon arrival.

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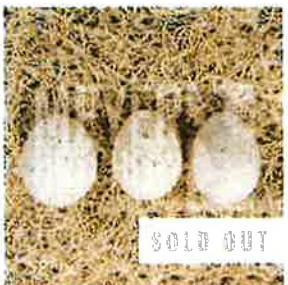


\$8.00

**Meyer Hatchery's
Signature Broad-
Breasted White
Turkey Hatching Eggs**



Price Per Egg



\$8.50

**Meyer Hatchery's
Signature Broad
Breasted Black
Turkey Hatching Eggs**



Price Per Egg

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Exhibit B

Officer Recommendations

Date: 12/18/2025

Dog Owner: Ashley Webster & Jed Kanooth

Dogs: Siggy, intact female St. Bernard white and tan
Rollo, neutered male Labrador Mix yellow

The County Animal Control program through its Community Animal Officer Keeanna Stansbury, in the matter involving the two dogs: Siggy and Rollo who were found harming chasing livestock.

Makes the following recommendations:

1. That the County find that on 11/6/2025, Siggy and Rollo committed the act of chasing harming livestock by chasing and harming turkeys at 74289 Fern Hill Rd. in Rainier. Whereas 3 turkeys remained unharmed, and 1 turkey was dispatched due to its injuries sustained by the dogs.
2. That the County find that Siggy and Rollo had no priors for chasing/harming/killing livestock.
3. That the County find that the investigation determined that Siggy and Rollo were unlicensed at the time of the incident.
4. That the County find that from the Community Animal Officers investigation, finds that on 9/16/2025 the dogs, Siggy and Rollo, were running at large, impounded, and brought to the shelter.
5. That the owner Ashley Webster was provided an impound notice on 11/6/2025.
6. That the owners, Ashley Webster and Jed Kanooth, remove both Siggy and Rollo to a location where, in the opinion of the county, the dog(s) do not present a threat to livestock.
7. That the Shelters observations of the dogs are that they both are placeable dogs and would be candidates to remove from the property in compliance to ORS 609.162(1)(c) whereas the dogs would be placed where they do not present a threat to livestock.
8. That the County order restitution to be paid to Christina Keith for the loss of her turkey in the amount of \$25.00.
9. That the County order restitution be paid to Columbia County Animal Control for impound and boarding fees in the amount of \$1,940.00.
10. That the County order a minimum fine in the amount of \$500 per dog. 609.162 (d) and that this fine be enhanced under ORS 609.163 to \$1000 per dog due to the dogs being unlicensed.