THE HUMANE SOCIETY OF THE UNITED STATES

July 16, 2019

Dear Honorable Members of the Stamford City Council,

On behalf of the Stamford-based supporters of The Humane Society of the United States (HSUS), the largest animal protection organization in the country, please accept this letter in support of a humane pet store ordinance that will drive the pet market in Stamford towards more humane sources such as shelters, rescues, and responsible breeders, and cut off profits for cruel puppy mills by prohibiting the sale of dogs and cats in pet stores.

Proposed language:

1) Definitions:
   a) ″Pet shop″ has the same meaning as provided in section 22-327 of the Connecticut general statutes;
   b) ″Animal welfare organization″ means a nonprofit organization that has: (1) Tax exempt status under section 501(c)(3) of the United States Internal Revenue Code, and (2) a mission and practice of rescuing animals and placing such animals in permanent homes. ″Animal welfare organization″ does not include any organization that obtains animals from a breeder or broker in exchange for payment or compensation;
   c) ″Breeder″ means any person who breeds or raises dogs to sell, exchange or otherwise transfer to the public; and
   d) ″Broker″ means any person who transfers dogs for resale by another person.

2) No owner or operator of a pet shop shall offer for sale, adoption, transfer or advertise the sale, barter, auction or give away of any dog, provided nothing in this section shall be construed to prohibit the owner or operator of any such pet shop from collaborating with an animal welfare organization or any municipal animal control agency to offer space for such organization or agency to display dogs available for adoption from such organization or agency.

The above language will safeguard against sham rescues, and align with the intent of this ordinance, which is to stop puppy mill traffickers.

This ordinance is important for Stamford for the following reasons:

- **Business friendly.**

  The overwhelming majority of pet stores do not sell puppies, including the largest and most successful chains (e.g., PetSmart, Petco) as well as small mom-and-pop shops, proving that pet stores do not need to sell puppies to be successful. To date, 73 Connecticut pet shops have signed the HSUS's "Puppy Friendly Pledge," declaring they do not sell puppies and will not do so in the future, including five in Stamford:

  Stamford pet shops who have pledged to not sell dogs
  Choice Pet Supply
  Fish Bowl Pets
  Natural Pet Supply
  Sport-N-Life Dist.
  Pet Valu

  Pet Valu's Marketing Coordinator, Connie Lawney, said: "Pet Valu is proud to be part of the Puppy Friendly Pet Stores Program, which reinforces our commitment to providing our consumers with quality pet supplies while looking out for the best interest of animals. We believe that this will be a successful business model." Pet Valu has over 900 stores in the U.S. and Canada.

  Responsible breeders will not be impacted by a humane pet store ordinance, since **responsible breeders do not sell to pet shops**. The HSUS reviewed Codes of Ethics for the National Breed Clubs representing all 178 dog breeds recognized by the AKC, and found that 96% of those National Clubs include statements to the effect that their breeders should not and/or do not sell to pet stores.

  The dozen pet store businesses in Connecticut that still sell commercially raised puppies operate based on an outdated and socially unacceptable business model—they are outliers in their own industry. According to the American Pet Products Association, Americans spent $72 billion on their pets in 2018 and every category, including food, products, and services, saw an increase *except* live animal sales, which they predict will continue to decline. Any pet store should be able to tap into this booming products and services market and thrive without selling puppies.

- **Consumer protection.**

  This ordinance would protect consumers from being duped into supporting cruel puppy mills and ending up with sick or behaviorally challenged puppies.

  The HSUS has conducted numerous hidden-camera investigations which consistently reveal that pet stores supply unsuspecting consumers with puppies from inhumane large-scale

commercial breeders, despite claims by pet stores that they would "never obtain dogs from puppy mills."

Across the board, pet stores claim that they obtain animals from small-scale, humane breeders. The reality is that pet stores do not have the option to obtain dogs from responsible breeders because responsible breeders do not sell puppies to pet stores.

At the HSUS, we receive a constant stream of complaints from consumers who have spent thousands of dollars in veterinary bills caring for their sick pet store puppies. Puppies in pet stores are often sick because they are born into deplorable conditions, taken from their mothers very early, exposed to a wide range of diseases, and very susceptible to genetic disorders. Yet, repeatedly, customers report that pet shops claim all their animals are healthy and came from only the highest quality breeders.

A 2013 study published in the *Journal of American Veterinary Medicine*, entitled "Differences in behavioral characteristics between dogs obtained as puppies from pet stores and those obtained from noncommercial breeders,"[1] concluded that obtaining dogs from pet stores versus noncommercial breeders represented a significant risk factor for the development of a wide range of undesirable behavioral characteristics, especially aggressive behavior and biting. Due to the results of the study, the authors stated that they cannot recommend that puppies be obtained from pet stores.

May 2019 HSUS undercover investigation of Petland/Safari Stan's

Report:
https://www.humanesociety.org/sites/default/files/docs/PetlandReport_FINAL-May2019.pdf

Link to video (2 minutes):
https://www.youtube.com/watch?v=Afh45-zl_Ic

- **Protects against public health risks.**

According to the Centers for Disease Control (CDC), 118 people across 18 states—including at least two in Connecticut—were infected with an antibiotic-resistant strain of *Campylobacter* in 2017.[2,3] The CDC linked this outbreak to contact with pet store puppies, and reported that 26 of those infected had to be hospitalized. The outbreak was so serious, said the CDC, because the *Campylobacter* bacteria involved were resistant to commonly

[1] McMillan, Franklin D, DVM, DACVIM; James A. Serpell, PhD; Deborah L. Duffy, PhD; Elmabrok Masaoud, PhD; Ian R. Dohoo, DVM, PhD, "Differences in behavioral characteristics between dogs obtained as puppies from pet stores and those obtained from noncommercial breeders," Journal of the American Veterinary Medical Association 242, No.10 (2013), 1359-1363.

[2] https://www.cdc.gov/mmwr/volumes/67/wr/mm6737a3.htm?s_cid=mm6737a3_w

[3] https://www.cdc.gov/campylobacter/outbreaks/puppies-9-17/index.html

recommended, first-line antibiotics. This is not surprising considering the reckless use of antibiotics in the puppy-selling pet store industry with the goal of having sick puppies appear healthy on the sale floor. In fact, the CDC found that 95% of pet store puppies studied received one or more antibiotic courses before arriving or while at the store, and that just 1% of puppies that received antibiotics were given them for treatment only. The rest were given preventatively.

Significantly, the CDC stated that the risk for multidrug-resistant *Campylobacter* transmission to pet store employees and consumers continues. This is not surprising considering the observations of one CDC official, Dr. Robert Tauxe, about the pet store investigation[4]:

> "The puppy story is not over – it is difficult to control with a whole system that lacks hygiene at many points and seems to use antibiotics instead."
>
> "We are collecting data on antibiotic exposure. Prophylaxis appears to be nearly universal…during transport and distribution, and at stores. We don't know what happens at the breeders. There seems to be no concept of stewardship."

Petland, the only national chain of puppy-selling pet stores left in the nation, was at the center of the antibiotic-resistant *Campylobacter* outbreak. In a January 2018 Outbreak Advisory[5], the CDC noted that puppies sold through Petland stores were the likely source of the outbreak because 87% of people infected reported they had contact with a puppy from Petland stores, or had contact with a person who became sick after contact with a puppy from a Petland store. Plus, 25 of the ill people were Petland employees. In Connecticut, Petland operates under the name "Safari Stan's Pet Center."

- **<u>Connecticut pet stores who sell commercially bred dogs are dealing with puppy mills.</u>**

A review of CT Dept. of Agriculture importation records[6] for pet shop sales from Nov 2018 through Mar 2019 shows that Connecticut pet stores who sell commercially bred dogs have recently imported dogs from some of the worst puppy mills in the country[7] (see Appendix A).

Petland/Safari Stan's stores are infamous for sourcing from puppy mills and puppy mill brokers, including many that have appeared on HSUS Horrible Hundred reports. Documentation also shows that Petland stores continued to source from Blue Ribbon Kennels—a massive puppy broker—despite knowing this broker was linked to the *Campylobacter* outbreak that sickened over 100 Americans and countless puppies.

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[4] Records obtained by the HSUS via Freedom of Information Act Request to the CDC
[5] https://www.cdc.gov/campylobacter/outbreaks/puppies-9-17/index.html
[6] The Humane Society of the United States reviewed Certificates of Origin from Connecticut's Department of Agriculture for the time period 11/1/2018 through 3/25/2019.
[7] https://www.humanesociety.org/horrible-hundred

- **Promotes humane pet stores, responsible breeders, and adoption.**

  This ordinance would require pet shops to adhere to a humane business model, not put them out of business. The puppy-selling pet store model is outdated and socially unacceptable. Of the top 25 pet store chains in North America, only one – Petland/Safari Stan's -- sells puppies and kittens.[8] The others are thriving by selling products and offering quality services, such as grooming, training, and boarding. Even stores that used to sell puppy mill puppies are thriving on the humane model. The largest and most successful pet store chains in the country (PetSmart and Petco) do not sell puppies, but rather partner with local shelters and rescues to hold adoption events at their stores. PetSmart claims that consumers who adopt a dog or cat at one of their events spend 5 times more than the average consumer at their store and often become loyal customers.

  In California and Maryland, the two states that have enacted sales ban laws, prominent local pet store chains enthusiastically supported the measures. The owners of Pet Food Express' 60+ stores, in a letter to CA legislators, wrote: "*We support AB 485 because we want to see all pet stores operate responsibly. Not only is it the right thing to do, but it's the key to a successful business."* Similarly, the marketing manager for 8 Bark! stores in Maryland testified: "*Adoption events create the busiest times at our stores…and always provide a noticeable boost in our sales for that day.*" She also said that the rescues and shelters with whom the stores partner recommend Bark! to their adopters, which has increased customer count and sales.

  Just as there are humane pet stores that stand in contrast to those clinging to a model that relies on the sale of puppies from puppy mills, there are also responsible breeders who stand in stark contrast to puppy mills. This ordinance will not impact responsible breeders because they already do not sell to pet stores. Rather, they sell directly to the public so they can meet prospective buyers in person. Even the AKC, who is funded largely by the puppy mill industry, agrees with the HSUS and responsible breeders everywhere that "the best way for a person to obtain a new pet is through personal interaction with the pet's breeder and the pet under consideration." When purchasing a puppy from a pet store, this is simply not possible.

  The ordinance also supports shelters by encouraging consumers to adopt and allowing pet stores to partner with shelters and rescues, rather than allowing them to consider selling puppy mill puppies. It would also lessen the burden on shelters that take in pet store dogs. Many pet store dogs end up in shelters because they are often sick and expensive to care for and come with a wide range of behavioral problems—a result of a lack of necessary socialization.

[8] http://www.petbusiness.com/February-2016/The-Top-25-Pet-Retailers-in-North-America/

- **Connecticut's current pet store law[9] has been rendered unenforceable.**

  Connecticut's pet store sourcing law allows pet stores to source from USDA-licensed breeders without certain and repeat violations of the Animal Welfare Act. Unfortunately, this law has done little to protect animals or consumers. It did not stop two Connecticut residents from contracting an antibiotic resistant strain of *Campylobacter* after contact with pet store puppies.

  A major flaw of the current law is that it relies on a broken USDA licensing and inspection program. When the law was enacted, welfare groups had hope that the USDA would clean up its act. For instance, we were hopeful that the agency would respond to the nearly 250-paged, detailed petition[10] the HSUS, the Humane Society Veterinary Medical Association, and the American Society for Prevention of Cruelty to Animals submitted asking the USDA to promulgate new rules to address the severe welfare concerns with its current regulations and enforcement. The USDA has made clear it has no intention of strengthening the shockingly low commercial breeder standards of care, nor improving its enforcement of them.

  USDA standards continue to allow commercial breeders to keep dogs in cramped, stacked, wire cages only six inches larger than each dog for their entire lives. The USDA does not require that dogs be regularly let outside of their cages for exercise, nor does it mandate socialization. Dogs can be kept in extreme temperatures for prolonged periods of time. Females are bred as early and often as possible and personnel without veterinary training often perform surgical births. Breeders are not required to vaccinate dogs from many highly infectious deadly diseases or to provide regular veterinary care. When dogs are no longer able to reproduce, breeders often abandon or inhumanely euthanize them. Thus, even if a breeder complies with all USDA requirements, a breeder can keep animals in extremely inhumane conditions.

  To its credit, the USDA is honest about its shortcomings. The USDA explains on its website's FAQ page, "we do not 'certify' establishments" and "a USDA license is not a 'seal of approval.'"[11] The USDA has repeatedly asserted that their regulations and standards are *minimum* requirements that should be built upon by the states and that regulated businesses should exceed.[12] Moreover, the last time the USDA audited itself, the Inspector General reported that the USDA does a poor job of enforcing these minimum standards, stating the

[9] PA09-228 required pet shops to provide breeder/broker information to the State Department of Agriculture, making it possible to trace the dogs sold in Connecticut pet shops directly to puppy mills. PA14-77 made it so that pet shops sourcing through breeders found to have egregious animal welfare violations would face significant fines.
[10] http://blog.humanesociety.org/wp-content/uploads/2015/09/HSUS-Puppy-Mill-Petition-for-Rulemaking-FINAL3625509_18_DC.pdf
[11] https://acissearch.aphis.usda.gov/LPASearch/faces/CustomerSearch.jspx
[12] See 7 U.S.C. § 2143(A)(8), stating that the federal Animal Welfare Act does not preempt state laws; U.S. Department of Agriculture, Animal Plant and Health Inspection Service, "Fact Sheet: Animal Care. The Animal Welfare Act," in http://ca-biomed.org/pdf/media-kit/oversight/USDAAWA.pdf (accessed 5 Dec, 2013).

agency "was not aggressively pursuing enforcement actions against violators" and "assessed minimal monetary penalties" against violators.[13]

As if that is not bad enough, since the Connecticut pet store bill has been in effect, the USDA has taken steps to protect animal abusers. Breeders' USDA inspection reports used to be publicly available on the USDA website for the public and enforcement agents to view. Those looking to bring a new puppy into their family could search a prospective breeder on the USDA website, and agents in states such as Connecticut, with laws based on breeders' violations histories, could verify pet store compliance. That is no longer the case. Currently, the USDA does not allow users to search online inspection reports by breeder name or license number and redacts all info on inspection reports that could connect a report to a specific breeder.

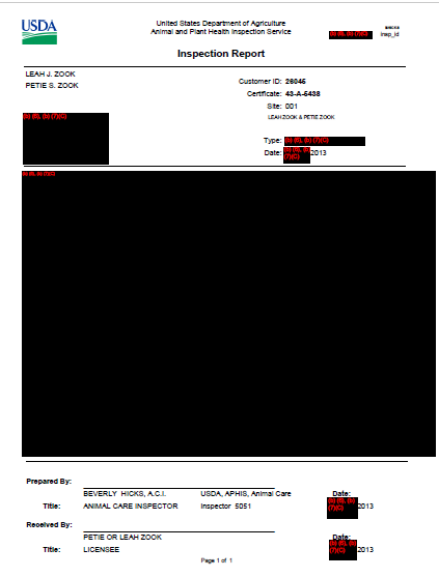

Figure 1: USDA report redacted to the point of uselessness. This lack of transparency now makes Connecticut's puppy mill trafficking law unenforceable.

See Figure 1 for what the public and enforcement agents can expect from the USDA at this time if, rather than searching online, they submit a FOIA request. There is absolutely no indication from the USDA that it plans to change this abysmal level of transparency.

Connecticut pet stores may claim this is irrelevant because they can get unredacted inspection reports directly from the breeders, but this is not a viable solution because the breeder can, and will, cherry pick which inspection reports to send, since they know neither the pet store nor the state can prove reports have certain violations missing. As such, the Connecticut pet store sourcing law is unenforceable. The puppy mills know it, and so do the pet stores.

- **<u>Growing momentum:</u>**

Over 300 localities in the U.S., as well as the states of California and Maryland, have passed laws prohibiting the sale of dogs in pet shops. This movement continues to grow.

In 2018, Maryland became the second state to prohibit the sale of dogs and cats in pet stores, in large part because their sourcing law (similar to Connecticut's current law) was failing to protect consumers or animals. Connecticut House Bill 5386 (2019) poised our state to join those who have taken a strong stand against puppy mill cruelty, but unfortunately, the bill was loaded up with amendments that would have promoted trophy bear hunting, and the threat of

[13] U.S. Department of Agriculture, Office of Inspector General, "Animal and Plant Health Inspection Service Animal Care Program Inspections of Problematic Dealers," Audit Report 33002-4-SF (May 2010), 1.

a filibuster on this unrelated topic resulted in the bill not being taken up for a vote in the House of Representatives.

The morals and values of Connecticut simply cannot be represented by allowing the sale of dogs from puppy mills – an industry intrinsically linked to unnecessary animal suffering.

To learn more, please go to humanesociety.org/puppymills or visit humanesociety.org/horrible-hundred.

Thank you for your time and consideration.

Yours truly,

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APPENDIX A

Where Do Connecticut Pet Stores Get Their Puppies?

In response to a public records request to the Connecticut Department of Agriculture, the Humane Society of the United States (HSUS) was provided with certificates of origin for puppies sold by pet stores in the state of Connecticut from November 2018 to March of 2019.

These certificates of origin verify that Connecticut pet stores have sourced puppies from breeders and brokers with abysmal animal welfare records. Every year The Humane Society of the United States (HSUS) publishes a Horrible Hundred report detailing a sampling of problem puppy mills in the United States. According to the certificates of origin provided by the CT Dept. of Agriculture, between November 2018 and March 2019 Connecticut pet stores sourced puppies from at least 20 commercial breeders/brokers with violations horrific enough to land them in the HSUS Horrible Hundred report.

This is not a complete list of all breeders and brokers that Connecticut pet stores source puppies from, but merely a sampling of facilities that were identified in certificates of origin provided from the state, and that HSUS has inspection reports and/or photos of from the USDA and state inspection agencies.

MILTON LEWIS (NEBRASKA)
SOLD TO PUPPY KISSES, DANBURY

The Nebraska Dept. of Agriculture received a complaint about Milton Lewis' breeding operation on September 18, 2017. The complainant claimed that Lewis had passed a June 2017 inspection only by hiding injured dogs and concealing some dogs in other locations on the property that the inspector never visited. The complainant said that the dogs did not get regular food and water, and the facility had a high rate of puppy mortality. The following are notes from state inspectors who visited Lewis' facility two days after the complaint was filed:

- Inspectors observed that almost all of Lewis's dogs were out of their pens, huge holes had been dug to escape the pens, and puppies and adults were running together. They saw no shelters in the pens and several large holes dug in the ground so deep, "you could not even see the dog in them." There was "a large accumulation of feces" and "junk/trash" in the pens and yard.
- Inspectors saw, "several litters of puppies most about 4 weeks and no moms in with them." They asked Lewis to put the mothers with their puppies but Lewis, "wanted [the inspectors] out of the building to do this." One inspector went to get a microchip scanner and returned to find "Milton was holding a yellow/white lab puppy who had just gotten its leg bitten off by another dog which had followed Milton into the whelping building."
- A golden retriever with its head in a hole appeared to be dead but, "[Lewis] said it wasn't dead but it had gotten in a fight with the other dogs. [The inspector] asked to go in and look at the dog but [Lewis] wanted to bring the dog out to her. When [Lewis] put the dog on the ground, all the dogs around us started attacking the Golden Retriever in a pack like mentality. [Lewis] had to fight the dogs off the Golden [until he] could get her back into her pen." The dog was then inspected inside of the pen and was found to have "puncture wounds" on her back leg and a swollen eye.
- September 21, 2017: Lewis contacted a state inspector, "about euthanizing 14 dogs/puppies. The reasons Milton gave were; grooming required (burrs caught in fur), lack of buyer interest in certain breeds and mixed breed dogs/puppies. [The inspector] mentioned the option of rescues/shelters to Milton, but Milton rejected [the suggestion] for various reasons."

NE Dept. of Ag. Milton euthanized this dog because it had fly strike on his nose.

NE Dept of Ag. This golden retriever was found with its head in a hole.

SHARON MUNK, BJ'S & GUYS, LLC (KANSAS)

SOLD TO CT BREEDER, NORWALK

BJ's & Guys is thought to be the largest breeder/ broker in Kansas, with 755 adult dogs and 425 puppies found at a federal inspection in July 2016, a total of 1,180 animals. All conditions listed below were found by the USDA in July of 2016:

- Shih tzu with a swollen, red eye that had copious, thick discharge; a pomeranian with scabs and hair loss; adult dogs sticking their heads through unsafe gaps in their cages
- Puppies with feet dangling through 1-inch gaps in the wire flooring, a condition that could lead to serious injury or leg entrapment.
- Housing with flaking paint and rust that in some areas was so advanced that it was affecting the structural safety.
- Two buildings housing dogs in excessively hot conditions. One building reaching a high of 91.9 degrees and another reaching a high of 87.6 degrees Fahrenheit. The USDA inspector noted that these conditions could lead to heat stress in the dogs.

SHELLI KERSHNER (KANSAS)
SOLD TO CT BREEDER, NORWALK

This breeder received an official warning from the USDA on August 21, 2013 for violating federal regulations. It was noted that any further violation may result in a civil penalty, criminal prosecution, or other sanctions. An inspector returned two months later, on October 23, 2013 and the facility received more citations, yet continues to operate and sell to pet stores in Connecticut.

Kansas Department of Agriculture reports:

- February 2017: cited for chewed area that needed repair, a door that was starting to rust, a dog that needed his nails trimmed; and dogs that needed bedding as temps were getting colder.
- February 2016: cited for pens that were rusting, pens with holes that were dug in the ground that could allow dogs to escape, 3 dogs with inadequate enclosure space, and a Great Dane with a very prominent backbone.

An October 23, 2013 USDA inspection resulted in the following citations:

- Failure to provide veterinary care to dog with discharge and brownish crust on her eye. Eye was clouded with a pink, fleshy protrusion in the center. Dog was observed rubbing eye against the enclosure and inspector noted eye problems may cause pain and discomfort.
- Failure to identify all puppies on the premise, as one puppy was not identified with a collar, tag, or tattoo, making inspection and tracking difficult.
- Failure to provide shade to two dogs housed in outdoor enclosures.

During a July 22, 2013 USDA inspection, Kershner was cited for numerous violations, and the inspector took the following photos:

USDA. Cited for failing to provide vet care to dog with brown material on teeth and red gums.

USDA. Cited for long toenails, noting this can make walking painful.

USDA. Cited for inadequate space, meaning this facility did not provide these dogs with an enclosure that was at least 6 inches larger than each dog.

On March 14, 2011 the USDA inspected Kershner. The inspector cited the facility for the following violations and took the following photos:

USDA. Cited for tub with feces, and feces build up under enclosure.

USDA. Cited for excessive feces beneath upper level of raised pens.

USDA. Cited for denying veterinary care to dog with cloudy blue right eye.

DWAYNE E. YODER (OHIO)

SOLD TO SAFARI STAN'S PET CENTER, NEW HAVEN

In July 2017, a USDA inspector found dogs with moldy food at a Dundee, Ohio, breeding operation linked Dwayne Yoder through USDA and state inspection records. The inspection report described conditions as follows:

> "Three primary enclosures containing two dogs each had feeders that contained moldy food. The eighth kennel on the left-hand side and the third kennel on the right-hand side containing Yorkshire Terriers showed a collection of moldy food in the corner of both the feeders. The primary enclosure in the middle of the kennel containing two Havenese has a large rusty feeder with cobwebs in the corner. Mold is on the tray of the feeder and moldy food is scattered along the tray. The second kennel on the left-hand side which contains no dogs also had moldy food left in the feeder." In addition to the USDA violations, Yoder received a state violation in March 2018 for not having physical exam records on the dogs in the kennel, as required by state law.

MARLA AND ROGER CAMPBELL (KANSAS)
SOLD TO PUPPY LOVE, DANBURY

On July 15, 2016, the USDA filed a complaint against the Campbells for several non-compliance issues found in 2015 and 2014:

- Numerous dogs found in need of veterinary care including a dog with a leg injury, dogs with hair loss or skin conditions including patches of pink and scabby skin, dogs with eye disorders, and a dog with an open wound.
- Several sanitation issues including excessive feces and unsafe housing.

In July 2016, the Campbell's also underwent a state inspection at which time the following was found:

- The inspector noted that the outside kennels were "showing quite a bit of wear" with bare wire that was subject to rusting and needed to be sealed or painted. The inspector noted "bare wire on the flooring may need to be replaced to allow for the comfort of the dogs standing on it."
- Other issues included unsanitary water buckets, dog waste stored too close to the kennel, and additional problems with rusty surfaces that could not be properly sanitized.

An April 2013 USDA inspection of the Campbell's kennel found:

- Two boxers who were "very thin, with back bones ribs, and hip bones clearly visible," according to the inspector. Both dogs were females who were nursing litters of puppies.
- A bull terrier who had hair loss and cloudy eyes.
- Unsafe housing, dirty feeders, and dogs kept outside in the cold without adequate protection from the weather.

In 2012, USDA inspectors cited the Campbells for a dog with a bloody, swollen foot, a dog with eye problems, and keeping medications for use on the dogs that had expired in 2009.

CAROL PROTHE (MISSOURI)
SOLD TO PUPPY KISSES, DANBURY

In September 2014, The USDA fined Prothe $2,857.00 for failing to provide veterinary care for six different dogs, failure to clean up excessive feces, failure to protect dogs in frigid weather. Additional issues included a drainage area with two or three inches of feces that the licensee admitted had not been cleaned in about a week.

In January 2013, Missouri state inspectors found dogs who could not drink their water because it was frozen. Despite being warned about these repeated issues with dogs exposed to the cold weather, USDA inspectors found the same problem in March 2015, when no bedding was found in the outdoor enclosures even though the temperature the night before had been in the 40s.

TIFFANIE KURZ, TIFFANIES, LLC (MISSOURI)
SOLD TO THE DOG HOUSE, MANCHESTER

This is a large broker--middleman dealer between breeders and pet stores--located in the heart of puppy mill country. This broker was cited by the USDA on June 10, 2016 for housing 18 puppies in enclosures that didn't meet the minimum floor space requirement, noting "this requirement is important for the health and well-being of the puppies." At time of inspection this broker had 229 puppies in its possession.

The Missouri Dept. of Agriculture inspected this broker in June 2018 and 121 puppies were noted on the property. The broker was cited for violations including:

- A cage card that did not state the birth date of the puppies for identification purposes
- A bottle of Fortified Vitamin B Complex stored with other medication that was being used at the facility, did not state directions for use in puppies or kittens, nor was there a prescription label for use
- Two puppies were housed in enclosures that did not provide the required six inches of head space; a Bulldog puppy was coughing and lethargic; a Shar-Pei/Beagle mix had patchy areas of reddened skin with some scales near the ventral abdomen.
- The Missouri Department of Agriculture did a follow-up inspection regarding the Bulldog puppy in July 2018. The broker provided a letter of examination for the puppy from a licensed vet, however the licensee did not follow the prescribed treatment and administered unauthorized medication.

JUDY MAASSEN (IOWA)
SOLD TO PUPPY KISSES, DANBURY

This breeder was cited by the USDA in 2014 because the official program of veterinary care for Maassen listed "gunshot in brain at close range" as the primary method of euthanasia. During that same visit a shar pei was found with a large, red swelling on her paw, and she had not been treated by a vet at the time of inspection. There was also unsafe housing that needed repair.

JUSTIN JACKSON (KANSAS)
SOLD TO CT BREEDER, NORWALK

Jackson has a long history of egregious welfare violations, as cited by USDA inspectors and Kansas state inspectors, including but not limited to the following:

- 10/2016: A state inspector noted numerous unsafe and/or unsanitary conditions, including cages that were starting to rust or had broken or sagging wire flooring, corroded and broken posts or braces that were supposed to hold up parts of the kennel, excessive feces and flies in some part of the kennel, and barrels that were barely large enough for dogs to stand in and being used for dog houses.
- 10/2016: there were 610 dogs and puppies noted on the property according to a state inspection report
- 01/2016: USDA inspectors found three underweight Vizslas. The ribs and backbones were visible, yet the Jacksons had not consulted a veterinarian about the dog's condition. Cages were also rusty, sharp, or broken.
- 04/2015: a state inspector found four dogs who were very thin and dogs without enough bedding to protect them from the cold.
- 06/2014 and 09/2014: USDA inspectors noted seven dogs in need of veterinary care between the two visits. Injuries included swollen masses on feet resulting in an inability to bare weight on all four legs – common injuries for dogs forced to stand on wire cage floors continuously. A German shepherd was found with an oozing, open wound covering 1/3 of her ear.
- 2/15/15: 500 dogs were noted on the property

- 06/2013: USDA inspectors found six pages of repeat violations, some of which included two dogs with wounds on their ears and another dog with bloody and scabbed wounds.

The following photo was taken by a USDA inspector in September 2014 at Jackson's facility:

USDA. Cited for having a Shiba Inu with a swollen mass of tissue between toes of right rear foot.

USDA. Cited for having a German shepherd with open wound on ear.

USDA. Cited for having a dog with a swollen mass of tissue between toes.

LORILEE THOMAS (KANSAS)

SOLD TO ALL PETS CLUB, MULTIPLE LOCATIONS

This breeder has a history of welfare violations, as cited by USDA inspectors, including but not limited to the following:

- 10/2015: 994 dogs on the property
- 09/2015: 958 dogs on property
- 09/2015: Broken floor supports, gaps between the wall and floor in an enclosure, enclosures with rusted flooring, enclosures with sharp metal pieces protruding into the enclosure, enclosures with greasy buildup, and dirty food receptacles.
- 10/2016: Rottweiler puppy's feet were passing through mesh floor of an enclosure, and a litter of five Japanese Chin puppies' feet were passing through mesh floor of the enclosure.

The following photos were taken by a USDA inspector in 2011 at Thomas's facility:

USDA. Cited for broken wire mesh with sharp points by dog feeder.

USDA. Cited for Chihuahua with excessively long toe nails.

USDA. Cited for Shih Tzu with bulging cloudy eye.

USDA. Cited for Yorkshire terrier with matted hair.

CHOICE PUPPIES (MISSOURI)

SOLD TO PUPPY KISSES AND PUPPY LOVE, DANBURY

Formally the Hunte Corporation, which transports about 30,000 puppies yearly, was cited by the Missouri Department of Natural Resources for burying more than 1000 pounds of dead puppies per year, causing an environmental hazard. In another incident, a Hunte Corporation trailer carrying puppies to pet stores in the northeast caught fire off an interstate in Massachusetts, killing all the estimated 60 dogs inside. The Hunte Corporation, according to Motor Carrier Management Information System reports, had been involved in nine truck accidents between 2000 and 2009. Hunte was also involved in two crashes, one on 2/18/2016 in NY and one on 3/24/2015 in AZ which was fatal. Hunte also had 26 violations based on a 24-month record ending on April 29, 2016.

LEVI GRABER / BLUE RIBBON PUPPIES (INDIANA)

SOLD TO PUPPY LOVE, DANBURY AND GENTLE JUNGLE, MERIDEN

According to FOIA requests received by the Indiana Department of Health, seven puppies from this facility were linked to the antibiotic-resistant *Campylobacter* outbreak that infected 118 people, including two in Connecticut, and led to a Centers for Disease Control (CDC) investigation.

KIMBERLY COLEMAN, TLC KENNELS (MISSOURI)

SOLD TO CT BREEDER, NORWALK

Kimberly Coleman has appeared in all six Horrible Hundred reports put out by HSUS. Conditions found most recently at Coleman's facility include:

- In November 2017, state inspectors found two doors broken off their hinges and no smoke or heat detectors in one building.
- In April 2017, state inspectors found a schnauzer with matted hair; a buildup of feces, hair, grime and dirt in the pens; and some cages that were too small.
- In February 2017, USDA inspectors found a female shar-pei who was severely injured, with "blood matting down the hair around her right ear and fresh lacerations," on both of her hind legs. The lacerations were so severe that they left "a loose skin flap hanging." The same dog was also severely underweight with "a defined waist and visible rib cage." During the same inspection puppies were found in a cage that was too small.

Notes from a September 2016 USDA inspection detailed:

> An adult female poodle named Posey was found "lying on her side in an enclosure with three other adult dogs." The poodle "did not move her legs or appear able to rise," according to the inspection report. "When the licensee attempted to pick her up, she appeared painful," the report continued. "Even when she was removed from the enclosure, the dog made no effort to stand or use her legs. There was blood covering the back half of her body and what appeared to be bite wounds on her legs and back." A follow-up report dated Oct. 11, 2016, noted that the poodle had been taken to a veterinarian after the inspection, but was "no longer at the kennel." "a strong odor of urine and feces in the whelping area" and excessive feces in both the indoor and outdoor parts of the kennels.

During a January 2016 inspection, an inspector found:

- Conditions so filthy that many white dogs appeared brown.
- A puppy with his or her hind legs dangling all the way through the wire flooring; the inspector noted that the puppy appeared to have been "stuck for some time."

Significant violations have been recurring at the kennel since at least March 2014, when an inspector found a dog who was "extremely thin with minimal muscle mass so that nearly all her bones (shoulders, spine, ribs, hips, legs, etc.) were prominent," among other issues. During a January 2014 state inspection, inspectors noted that several dogs had a body condition score of only two or three out of nine (five is ideal), indicating that they were very underweight.

AUDREY ROTTINGHAUS (KANSAS)

SOLD TO CT BREEDER AND LAUREN MEREN LLC, NORWALK

In 2012 alone Rottinghaus, was cited for several dogs in need of veterinary care, including a limping dog and a dog with an open, swollen wound; housing so unsafe that a Yorkie's head was found entrapped in a gap in a cage lid, and initially refusing to let a federal inspector photograph a dog with oozing "blackish discharge" coming out of his ear, among other problems.

USDA. Chihuahua with an open wound on its right-hand side.

DAWN AND ROBERT TROUPE (OKLAHOMA)
SOLD TO SAFARI STAN'S PET CENTER, NEW HAVEN

USDA inspectors found several dogs with untreated medical problems during inspections in both February 2015 and October 2014, including dogs who appeared to have difficulty walking, and dogs with signs of occular or dental infections. The facility has been repeatedly cited for filthy conditions. During the February 2015 inspection, there was so much fecal material in some of the outside dog runs that it covered up to 50% of the floor, and the licensee reported that they had not been cleaned in about four days. During an October 2014 inspection, some of the dogs' water receptacles were found with "an algae looking substance" in them, and the facility representative admitted that they were only cleaned "every 4 to 6 weeks." There were also rodent droppings on the floor and around the food. The licensees were given an official warning by USDA in May 2014 for "refusal to provide access to an APHIS official" to conduct an inspection as required by the Animal Welfare Act.

ANGELIA KOCHS (MISSOURI)
SOLD TO LAUREN MEREN LLC, NORWALK

In January 2014, when a USDA inspector counted more than 300 dogs on the property, Kochs received an official warning from the USDA for failing to provide adequate veterinary care and protection from the weather to dogs on three different dates in 2013 and 2012. Affected animals included:

- French bulldog who was limping on both front legs; upon further examination the inspector noted "the toenails on both front feet were curling all the way around and back up against the pads" of the feet. The problem was so severe that the inspector noted the dog had bent her feet so that she could walk on "the joint above the padded feet area" rather than her paws.
- Two other bulldog's feet were in the similar condition, including one who was lying down and "shivering from the head to the tail."
- A French bulldog who was "in distress and attempting to give birth" to a puppy who was halfway out in the breech position, which the owner had not noticed; the puppy was dry, indicating it had been partially exposed for some time.
- Similar violations were documented in Missouri state inspection reports during several visits in 2013.