

## Colorado Springs City Council Worksession

Monday, February 24, 2020

### Additional Information

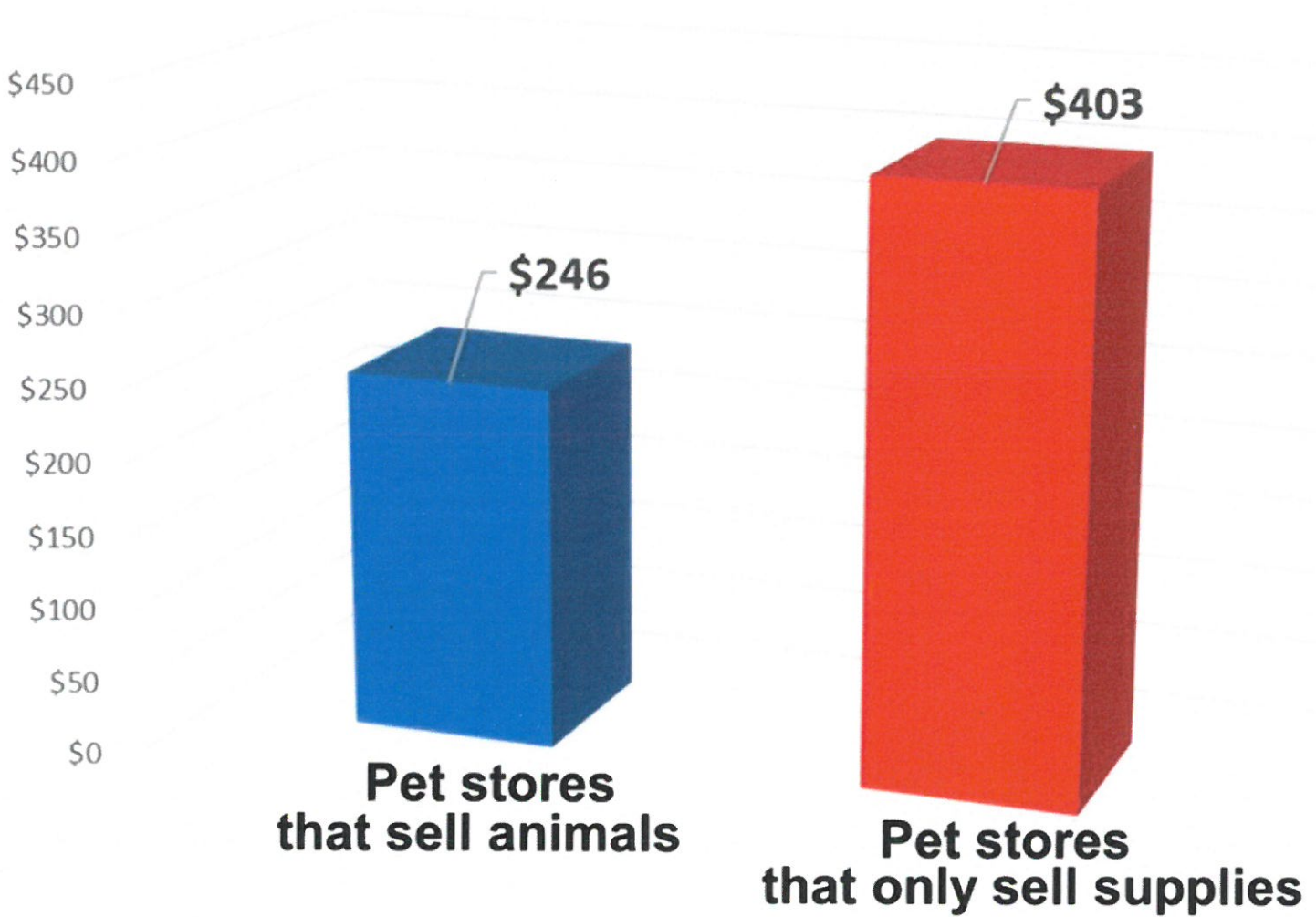
- I. We DO NOT want to put Pet City out of business!! We want them to change to a humane business model – Humane Society of the United States (HSUS) will help them do this.
- II. HSUS Pet Store Industry Trends and Success Stories
- III. Statement from a local reputable breeder
- IV. Humane Society of the Pikes Peak Region (HSPPR) Position Statements
- V. Federal Courts Uphold Pet Sale Ordinances
- VI. Colorado Citizens for Canine Welfare (3CW) Pet Store – Puppy Mill Reports

### Consumer Protection Issue

- I. Exorbitant Prices – Information from Pet City store visits
- II. Predatory Lending/Leasing Practices
  - a. Brochures from each store, and financing information from websites
  - b. What is the real cost of financing your pet purchase – LendingUSA brochure states interest rates of 16.39% to 29.99%
  - c. Consumer complaints to BBB and ScamFinance.com reveal that EasyPay Finance actually charges interest rates of 129% to 200%!!
- III. Sick Puppies Lead to High Vet Bills
  - a. Some of the illnesses that the puppies present once in their homes lead to \$1000's of dollars in vet bills.
  - b. Sometimes puppies die from their illnesses, while the owners are still paying off \$1000's on their purchase, and \$1000's more in vet bills.
  - c. Some diseases can spread to other pets in the home, such as: parvo (see Facebook post), distemper, dog flu, kennel cough, and other diseases.
  - d. Some diseases can spread to humans in the home including: campylobacter infection (see article), brucellosis, rabies, roundworm, hookworm, dog tapeworm and others.

# Humane Pet Store Model Makes Business Sense

## Pet Store Revenue Per Square Foot



Data: World Pet Association (WPA)  
2018 Retail Operating Performance Report

HarleysDream.org

# Pet Store Industry Trends and Success Stories

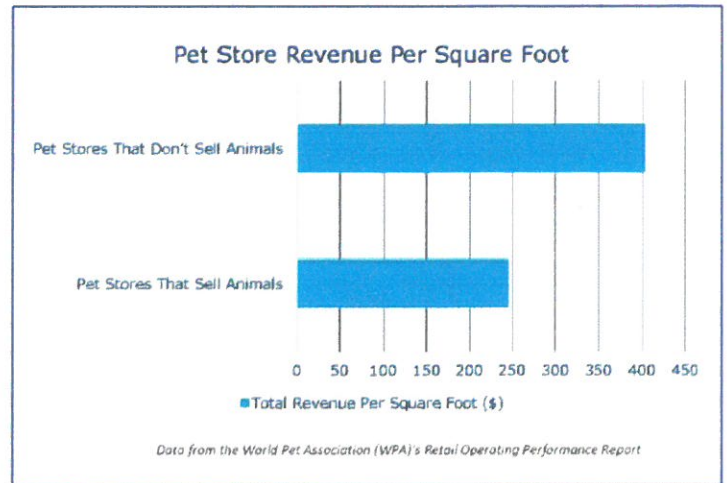
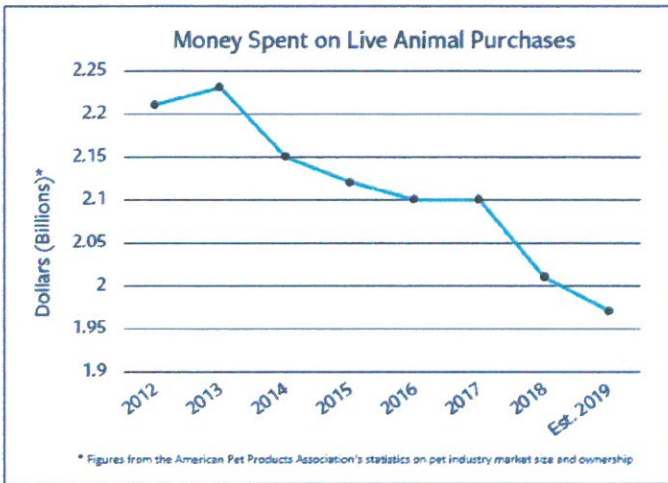
Stores can thrive by converting from the outdated and socially unacceptable business model that relies on the sale of mill puppies to a model that focuses on offering quality products and services, and hosting adoption events. Cries from some pet stores that they need to sell puppies to stay in business are baseless, as the vast majority do not do so. *Over 100 pet stores in CO have signed a Puppy Friendly Pet Store Pledge declaring they do not--and will not ever--sell puppies.*

**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 (see chart on the left below).

**World Pet Association Retail Operating Performance Report of 2018:** Pet stores with animals reported \$246 in total revenue per square foot, while pet stores that sell only dry goods

**Pet Business:** Of the 2019 “Top 25 Pet Retailers in North America” only one such retailer sells puppies, while the rest of the pet store companies are thriving by selling quality products and offering in demand services such as grooming, boarding and training.

**Consultancy EY-Parthenon (July 2018):** The pet industry has become a “potentially explosive market” as Americans are increasingly spending more on fancy food, treats, clothing and premium services such as grooming and pet spas, and 78% of people prefer to shop for their pets in brick-and-mortar stores.



## Quotes from Industry Leaders

“In a world where ecommerce penetration is growing in every retail category, services are an element that the Chewy’s and Amazon’s of the world haven’t figured out...they are important for maintaining strong, loyal relationships with consumers.”

-Independent Pet Partners co-founder **Mike Foss** on enhancing grooming, daycare and training in stores; IPP partners with 17 pet stores in Colorado

“I strongly believe that by giving these pet store business owners a different ideology with regards to the industry, you are helping these businesses from a profit standpoint, an educational perspective and setting a new precedent of a more humane peaceful existence for us all...that from someone who was in the same business longer than most.”

-Former owner of puppy-selling pet store **Precious**

At PetSmart, we never sell dogs or cats. Together with PetSmart Charities, we help save over 1,300 pets every day through adoption.”

-PetSmart.com

“We encourage anyone looking to add a new pet to their family to consider adopting a homeless animal, rather than purchasing one... Petco and the Petco Foundation partner with thousands of local animal welfare groups across the country and, through in-store adoption events, help find homes for more than 400,000 animals every year.”

-Petco.com

“To be perfectly clear, the Woof Gang Bakery company adamantly opposes the archaic and abhorrent practice of puppy mill breeding and selling puppy mill dogs. Good pet stores do not sell puppies and responsible pet breeders do



Vicki Allinger <vallinger@bailingoutbenji.com>

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**Fwd: Breeding**

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Francelle <[redacted]@gmail.com> Thu, Feb 6, 2020 at 11:40 AM  
To: Vicki Allinger <vallinger@bailingoutbenji.com>, Mindy <mindy.graper@bailingoutbenji.com>, [redacted]

[redacted] This is another one Vicki that we can send to Carly before the 12th

Sent from my iPhone

Begin forwarded message:

**From:** Holly [redacted]  
**Date:** February 6, 2020 at 11:09:33 AM MST  
**To:** [redacted]  
**Subject:** Breeding

I am a local breeder in Colorado Springs, Co. Any reputable breeder would Never EVER sell to a pet store. Any good breeder has years of wait lists.

Thank you

Holly Graper

Sent from AOL Mobile Mail  
Get the new AOL app: [mail.mobile.aol.com](http://mail.mobile.aol.com)



January 30, 2020

Dear Francelle Moore Backstrom,

Thank you for inquiring about Humane Society of the Pikes Peak Region's position on puppy mills. As we discussed, our agency does take a position on puppy mills and mass breeding, which was approved by our Board of Directors in July 2016. HSPPR is opposed to for-profit facilities which mass produce puppies for retail purposes, and we encourage potential pet guardians to consider shelter/rescue adoptions first. We support measures that increase standards of care and stand behind stronger humane housing standards for pets.

Sincerely,

Leslie Yoder  
Interim CEO

#### **POSITION ON PUPPY MILLS/MASS BREEDING**

Humane Society of the Pikes Peak Region opposes "puppy mills," for-profit facilities which mass-produce puppies for retail purposes. Roughly 10,000 licensed and unlicensed puppy mills exist in the United States. Two million puppies from puppy mills are sold annually in pet stores and via internet sales.

Puppy mills routinely subject animals to adverse conditions, such as overcrowding, poor kennel conditions, inadequate sanitation, food, and water, there is no socialization, and a lack of veterinary care. Female dogs are over bred, live behind bars their whole life and are killed or auctioned off when they can no longer produce litters. Sub-standard breeding practices often lead to genetic defects or hereditary disorders, and these defects along with other health issues and/or negative behavioral traits are often

overlooked in favor of financial profit. Consumers are often unaware of the health risks their puppy mill dog may face in the short and long term.

Humane Society of the Pikes Peak Region encourages potential pet guardians to consider shelter/rescue adoptions first. If a specific breed is desired and unavailable through a shelter, find a responsible breeder. Responsible breeders do not sell animals through a pet shop and allow buyers to meet a puppy's mother and father and see them in their home environment. Breeders place their animals personally and individually, and breed to preserve and improve their chosen breed, while providing their female dogs with high quality lives and human attention.

When pets are sold for profit and financial gain, the animal's health and well-being become secondary. All animals deserve appropriate housing, social interaction, sufficient room to turn and stretch freely, adequate food and water, regular exercise, adequate veterinary care, and adequate rest between breeding cycles. Consumers need to educate themselves on the plight of breeding animals living in puppy mills and find other sources for pet acquisition.

Approved: 07.16.2016



happy tails. happy hearts.™

April 26, 2017

Dear Bonnie Johnson,

Thank you for your interest in the Humane Society of the Pikes Peak Region's position statement on puppy mills. Our Board of Directors approved this position in July, 2016. We appreciate your advocacy to end the atrocities of mass breeding dogs and cats.

Sincerely,  
Jan McHugh-Smith, CAWA  
President and CEO

**Position on Puppy mills/mass breeding**

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Approved July 19, 2016





Ending puppy mill cruelty through education, outreach, and advocacy



## News & Updates

### Federal Courts Uphold Pet Sale Ordinances

i Jul 27th w No Comments x by Jayme McKellop

Retail pet sale bans have gained significant momentum in the past few years as a highly effective way to fight the puppy mill industry, with more than 75 jurisdictions in the U.S. and Canada passing ordinances prohibiting the retail sale of commercially-bred dogs and cats (and rabbits in some cases). These ordinances typically require pet stores that wish to sell animals to source those animals from rescue organizations or shelters. Not surprisingly, the puppy mill industry is feeling the pressure from these regulations, and has brought challenges in federal court to fight them. To date, five federal lawsuits have been filed in East Providence, Rhode Island, Phoenix, Arizona, Sunrise, Florida, Cook County, Illinois, and Chicago, Illinois.

We are thrilled to see that the courts are confirming what we have believed all along – that pet store ordinances are a lawful use of a city’s power to promote animal welfare and protect its citizens by regulating the sale of puppy mill dogs at pet stores. We are now 4 for 4 with four federal courts that have upheld retail pet sale ordinances against constitutional challenges.

#### East Providence, Rhode Island

- On March 31, 2015, the federal district court for the District of Rhode Island became the first of the federal courts considering challenges to retail pet sale bans to issue a decision. In a lengthy opinion on summary judgment, the Court upheld the city of East Providence’s retail pet sale ordinance, which prohibits the sale of dogs and cats in pet stores. It does allow pet stores to work with shelters and rescues to provide space and care for adoptable animals. It is similar to the ordinance at issue in Chicago, and the constitutional claims are nearly identical. While the federal district court in Chicago is not required to follow this decision, it should be very persuasive and is very encouraging. Read the opinion [here](#).
- The pet store that challenged the ordinance, Perfect Puppy, has filed its appeal to the First Circuit Court of Appeals.

#### Cook County, Illinois

- On May 21, 2015, federal judge Matthew F. Kennelly upheld the Cook County Companion Animal and Consumer Protection Ordinance against a challenge from two area pet stores, Happiness is Pets and Petland, and the Missouri Pet Breeders Association. The Judge granted the County’s motion to dismiss on all claims, including a challenge under the Commerce Clause, Equal Protection Clause, federal and state law preemption, Contracts Clause, and vagueness. The plaintiffs were given one last opportunity to amend their complaint, though the Judge stated that it was “highly unlikely” that they would be able to cure the defects in their complaint. The plaintiffs filed their amended complaint on June 11, and the last response brief was filed on July 21.
- The State’s Attorney’s press release is available [here](#), and you can read Judge Kennelly’s opinion [here](#).

#### Sunrise, Florida

- On June 25, 2015, Judge Robert N. Scola, Jr., of the Southern District of Florida, granted the city of Sunrise’s motion for summary judgment on the two federal claims at issue, challenges arising under the Commerce Clause and Equal Protection Clause. Read the Sunrise decision [here](#).

#### Phoenix, Arizona

Enter a search term... **SEARCH**

#### Recent Posts

- [The Puppy Mill Project has earned GuideStar’s Silver Seal of Transparency!](#)
- [Millie’s Mission Grant Recipient – Celeste](#)
- [Save the Date, National Puppy Mill Awareness Day 2018](#)
- [Cari Meyers featured in Magical Dogs 2, get your copy now!](#)
- [Tickets are now on sale for Mothers in the Mills 2018](#)

#### Gallery



#### Archives

- [December 2018](#)
- [July 2018](#)
- [March 2018](#)
- [January 2018](#)
- [September 2017](#)
- [July 2017](#)
- [May 2017](#)
- [March 2017](#)
- [February 2017](#)
- [December 2016](#)
- [September 2016](#)
- [August 2016](#)
- [June 2016](#)
- [January 2016](#)
- [July 2015](#)
- [February 2015](#)

- On July 27, 2015, the federal district court for the District of Arizona ruled in favor of the city of Phoenix's retail pet sale ban on all federal and state law claims granting summary judgment for the city, as well as for the Humane Society of the United States, which intervened as a party in the lawsuit. The Court found that Phoenix's retail pet sale ordinance did not violate the Commerce Clause or the Equal Protection of the U.S. Constitution. Read the opinion [here](#)

**Chicago, Illinois**

- In Chicago, two pet stores, Pocket Puppies and Park Pet Shop, and a Missouri breeder have challenged the Chicago Companion Animal and Consumer Protection Ordinance. The parties are currently submitting their briefs on the city of Chicago's motion to dismiss. The Puppy Mill Project has filed a joint Amicus brief with The Humane Society of the United States in support of the city's motion to dismiss.

**Comments**

**Disclosure**

TPMP is a federal 501(c)(3) and Illinois Not For Profit Corporation. All donations are tax-deductible to the extent allowable by law.

**Latest Tweets**

Celebrated Illustrator, RosemaryFanti, will be on hand at Mothers in the Mills to sketch your pet! Whether you bring... [twitter.com/i/web/status/11623...](https://twitter.com/i/web/status/11623...)  
August 16, 2019 12:12 pm

[@TitosVodka](#) really is the vodka for dog people! They will provide the vodka for our party. Get your tickets at... [twitter.com/i/web/status/11621...](https://twitter.com/i/web/status/11621...)  
August 15, 2019 11:07 pm

**Gallery**



**Location**


The Puppy Mill Project  
1341 W. Fullerton, Suite 353  
Chicago, IL 60614

[info@thepupymillproject.org](mailto:info@thepupymillproject.org)



<b>Pet Store Name:</b>	<b>Pet City of Chapel Hills</b>
<b>Owner:</b>	Precious Pals, Inc. <sup>1</sup>
<b>Store Address:</b>	Chapel Hills Mall 1710 Briargate Blvd Ste 411, Colorado Springs, CO 80909
<b>Store Phone:</b>	(719) 599-8899
<b>Owner Contact:</b>	Dustin Haworth <sup>1</sup>
<b>Contact Address:</b>	3610 Spitfire Dr, Colorado Springs, CO 80911 <sup>2</sup>
<b>Pet Store Website:</b>	<a href="http://www.petcitypetshops.net/our-breeders/">http://www.petcitypetshops.net/our-breeders/</a>

### Pet Store Website (Excerpt)



**Pet City Pet Shops Colorado**  
Chapel Hills: 719-599-8899  
Citadel Mall: 719-596-2722

HOME ABOUT US PUPPIES FOR SALE OTHER PETS PET SUPPLIES - FAQ'S FINANCING YOUR NEW PUPPY BLOG CONTACT US OUR BREEDERS

### What We Require from our Breeders

Throughout the years, Pet City Pet Shops have been in business, we have been leaders and pioneers in encouraging the betterment of breeders. The breeders that Pet City chooses to work with are not only required to meet all Federal, State and Local Laws, but meet a list of our own stringent rules and restrictions

- USDA and/or State Licensed
- Hobby breeder, as defined by the Animal Welfare Act (AWA), who raise their dogs in a humane manner<sup>3</sup>

In addition to the required licensing we demand our breeders provide the following things for our pets:

- A consulting veterinarian providing good medical care. The vet must create a written program for the breeder to follow and ensures the health of the dogs.
- The breeder must maintain written veterinarian records of medical care, as it is performed.
- The breeder must provide vaccinations against diseases and parasites.
- Safe and comfortable housing
- Frequent socialization and exercise
- State-issued health certification
- Every puppy that is sold must have a state issued health certificate from the state of origin. It must be signed and attested by a licensed veterinarian.

How we choose where to get our puppies...

- Pet city visits inspects [sic] breeders to ensure they meet our standards. We work with local, state and federal regulatory agencies and legislators concerning animal welfare issues and education
- Our processes are on-going and transparent. We investigate claims about breeder facilities that don't meet our requirements. This is our business and we take it seriously.



**Where Pet City Chapel Hills' puppies really come from:<sup>4</sup>**

The bottom line... more than 70% of puppies Pet City Chapel Hills purchased from outside Colorado during the last three-and-a-half years are from breeders with histories of violations of the Animal Welfare Act, puppy mill puppy brokers and puppy mills named as among the nation's worst by the Humane Society of the United States (HSUS).<sup>5</sup>

Breeder/Broker	Number of Dogs Bought from Outside Colorado 1/1/2016 - 6/30/2019	
	Total	% of Total
Large-Scale Breeder, History of Violations	312	47%
Other Breeder	146	22%
Puppy Mill Puppy Broker	75	11%
Large-Scale Breeder	46	7%
HSUS Horrible Hundred Puppy Mill	42	6%
Breeder with History of Violations	40	6%
<b>Grand Total</b>	<b>661</b>	<b>100%</b>

The breeders, puppy mill puppy brokers and Horrible Hundred puppy mills that make up the above are detailed below and described individually thereafter.

Breeder/Broker		Number of Dogs Bought from Outside Colorado 1/1/2016 - 6/30/2019	
		Total	% of Total
Lorilee Thomas	Large-Scale Breeder, History of Violations	251	38%
Nebraskaland Pets	Puppy Mill Puppy Broker	71	11%
Crystal Howard	Large-Scale Breeder, History of Violations	39	6%
Joyce Cairns	HSUS Horrible Hundred Puppy Mill	18	3%
Becky Mosshart	Large-Scale Breeder, History of Violations	13	2%
Shelli Kershner	HSUS Horrible Hundred Puppy Mill	12	2%
David Troyer	Breeder with History of Violations	12	2%
Stoney Creek Kennel LLC	Other Breeder	10	2%
Daynes Ridge Kennel	Other Breeder	10	2%
Toby Detweiler	Other Breeder	10	2%
Tiffanie's LLC	Puppy Mill Puppy Broker	4	1%
Other (79 breeders, individually < 1.2%)		211	32%
<b>Grand Total</b>		<b>661</b>	<b>100%</b>

• **Lorilee Thomas**

- Operates a facility with **642 adult breeding dogs, and 288 puppies**. She sells to pet stores all over the country and has a history of violations.<sup>6</sup>
- According to USDA inspection notes, violations include:<sup>7</sup>
  - Broken wire mesh with sharp points
  - Metal screws with sharp points in whelping box
  - Evidence of rodent activity
  - Hair and other excreta trapped in jagged sections of metal crates, bottom of plastic feeder, metal food receptacles, water lines and plastic structures
  - Toxic products stored on shelf directly above food storage area
  - Yorkshire terrier was found with excessively matted hair, balled and adhering to the skin.
  - Shih Tzu was found with a cloudy, opaque appearance on its left eye.
  - Several Chihuahuas were found to have excessively long toe nails, hair loss, thinning hair and reddened skin.



- **Nebraskaland Pets (Angie/Casey Schaff; Big Red Country Kennels)**
  - Nebraskaland Pets is a puppy mill puppy broker and breeder whose primary business is buying puppies from puppy mills and reselling them to pet stores. The use of puppy mill brokers makes it difficult if not impossible for the public to know who a puppy's breeder actually was. It would also make it difficult if not impossible for Pet City Chapel Hills to "...inspect breeders to ensure they meet [their] standards."
  - Nebraskaland Pets has been buying and reselling puppies from one of the largest and worst puppy mills in Minnesota since, at least, 2011.<sup>6</sup>
  - Nebraskaland Pets also operates a breeding facility with **202 adult dogs**.<sup>6</sup>
  - Since 2016, Nebraskaland Pets has sold nearly 5,400 puppy mill puppies to Colorado pet stores, making it the largest single out-of-state seller of puppy mill puppies to Colorado's pet stores, including Pet City Chapel Hills.
  
- **Crystal Howard (Best of the Best) - puppy mill with 48 adult breeding dogs**.<sup>6</sup>
  
- **Joyce Cairns (Unicorn Kennels)**
  - Joyce Cairns was named one of 2018's Horrible Hundred puppy mills by the Humane Society of the United States (HSUS). In its May 2018 report,<sup>8</sup> the HSUS noted:
    - Repeated violations for dogs in need of veterinary care; emaciated corgi found listless, with spine visibly protruding; Pekingese in need of surgery was not treated effectively more than six months later. Conditions at Unicorn Kennel appear to belie its fanciful name.
    - Severe animal welfare issues were found at the kennel within the last year, both by USDA and state inspectors, with the USDA finding at least nine animals in need of veterinary care during three visits in 2017 alone.
    - On December 13, 2017, a USDA inspector gave Cairns a "Direct, Repeat" violation - one of the most serious types of USDA citations - for multiple dogs in need of veterinary care, just three months after four other dogs had been found in need at her kennel. The dogs noted on the December report included two dachshunds with signs of advanced dental disease, including one who had so much dental calculus on some of her teeth that it "causes a visible bulge to the face when the dog's mouth is closed." Both dogs had loose teeth and a pus-like [*sic*] discharge on the gumline. In addition, the inspector found a Pekingese with signs of an ocular disorder; the white part of her eye was red, there was greenish discharge, and the cornea was dull and uneven. The inspector also found unprotected heat lamps that were dangerously close to whelping dogs.
    - Three months earlier (September 6, 2017), a USDA inspector found four other dogs in need of veterinary care, including an emaciated corgi and a Pekingese named Blondie, whom the owner had been directed to get care for in February, and who had still not been adequately treated more than six months later.
    - The September inspection also noted an update on two other dogs who had been found in need of veterinary care during a February inspection, stating they had been evaluated by a veterinarian, but did not specify whether the dogs had recovered. The third dog identified in the February inspection was Blondie, the Pekingese with severely thickened ear tissue, who was found in September to be still suffering from the same condition.
    - The kennel is also inspected by the Kansas Department of Agriculture. The kennel failed a February 2018 state inspection due to numerous problems, including excessive feces,



a strong odor and three dogs who needed care: a poodle with missing fur, a cockapoo who was matted and an Australian shepherd who was “thin” and “under vet supervision.”

- Unicorn Kennel also failed a state inspection on January 18, 2017, when dogs were found standing in wet, dirty enclosures with excessive feces, and two additional dogs were found in need of veterinary care.
- The state inspection in February 2018 showed that Cairns had approximately **200 dogs and puppies** at her puppy mill.

- **Shelli Kershner (Walnut Creek Kennel)**

- Shelli Kershner was named one of 2014’s Horrible Hundred puppy mills by the HSUS.
- In its May 2014 report,<sup>9</sup> the HSUS noted:
  - In August 2013, the USDA gave Kershner an official warning for a repeated failure to provide adequate veterinary care and a repeated failure to provide safe housing for her breeding dogs.
  - But even after this warning, in October 2013, a USDA inspector found a Shih-Tzu with her eye crusted shut and a “pink, fleshy protrusion” in the center of the eye.
  - There was another incident earlier in the year when a dog was found with “long toenails and reddened, bloody gums.”
  - In August 2012, the USDA found **109 dogs** at the kennel when its official records listed only 64, indicating that this B dealer was getting dogs from undocumented sources, which could include unlicensed puppy mills.
  - When the USDA returned in February 2014 to check on the kennel, they were not given access, which is a violation.

- **Becky Mosshart (Rebecca Mosshart, Sam Mosshart, SBM Kennels)**

- Becky Mosshart is a large-scale pet broker and breeder whose primary business is buying puppies from puppy mills and reselling them to pet stores, including the one she owns in Fort Collins, Colorado.
- Becky Mosshart operates a facility with **211 adult breeding dogs and 150 puppies**.<sup>6</sup>
- Mosshart also has a long list of violations including: Dogs standing on hard wire flooring, standing water in outdoor kennels (spilled), excessive flies, kennels so rusted there are holes, beetles crawling through food dishes, food bowls have excessive grime/oil buildup, dogs couldn’t access food and water without walking through excessive feces.<sup>6</sup>
- Mosshart is an opponent of a new Kansas law regulating rescues and breeders. She doesn’t want surprise inspections.<sup>6</sup>

- **Stoney Creek Kennel LLC** - breeder in Bloomfield, Iowa.

- **Jeremy Rodgers (Daynes Ridge Kennel)** - recently licensed by the USDA, **21 adult breeding dogs**.

- **Tiffanie’s LLC (Tiffanie Kurz)**

- “Tiffanie’s LLC is a massive Missouri dog broker...”<sup>8</sup> The use of puppy mill brokers makes it difficult if not impossible for the public to know who a puppy’s breeder actually was.
- Tiffanie’s LLC operates a breeding facility with over **229 puppies** on their property. Violations include keeping puppies in kennels that are too small.<sup>6</sup>



In 2017, the USDA significantly reduced the transparency of its public Animal Welfare Act records by redacting information to conceal the subjects of these records. According to the 2019 Horrible Hundred report of the Humane Society of the United States, “Without this information, the HSUS and the general public cannot evaluate whether USDA is meeting its charge. Additionally, consumers cannot judge whether or not they are supporting an operation which has been found employing the harmful practices described in this report. Moreover, the lack of transparency can be a hindrance to law enforcement efforts in jurisdictions that rely on inspection reports to determine compliance with state and local laws.”

With the limited information available, neither the 2018 nor 2019 Horrible Hundred report includes any additional findings related to the breeders in this report.

<sup>1</sup> PACFA Active Facilities List September 2019

<sup>2</sup> Colorado Secretary of State website ([state.co.us](http://state.co.us)) September 2019

<sup>3</sup> Hobby breeders are exempt from the AWA as well as the laws and regulations of at least 19 states (<https://www.cga.ct.gov/2013/rpt/2013-R-0309.htm>)

<sup>4</sup> A key source for tracking the origins of an animal is the Certificate of Veterinary Inspection (CVI). Before an animal is transported from one state to another, a veterinarian accredited by the United States Department of Agriculture (USDA) must examine the animal for signs of infectious, contagious or communicable disease and, if no disease is found, sign the certificate for approval to transport. The State of Colorado does not require any comparable documentation be issued for animals being transported within the state, but does keep records of CVIs associated with animals entering the state from other states. For purposes of preparing this and other reports, 3CW has accumulated these inter-state CVIs for all dogs entering Colorado from January 1, 2016 through June 30, 2019. The tables and discussion in this report are based only on the subject pet store's out-of-state puppy purchases as records of in-state purchases are not available.

<sup>5</sup> Sources: The Humane Society of the United States' Horrible Hundred Puppy Mills reports 2013 - 2019, and Bailing Out Benji website ([bailingoutbenji.com](http://bailingoutbenji.com)) as of September 2019. Where a breeder is not included in the HSUS reports or on the Bailing Out Benji website, 3CW has assigned the category “Other Breeder”.

<sup>6</sup> Bailing Out Benji website ([bailingoutbenji.com](http://bailingoutbenji.com)) September 2019

<sup>7</sup> ASPCA website <https://nopetstorepuppies.com/dog-breeder/thomas-lorilee-chris-and-featherston-opal> September 2019

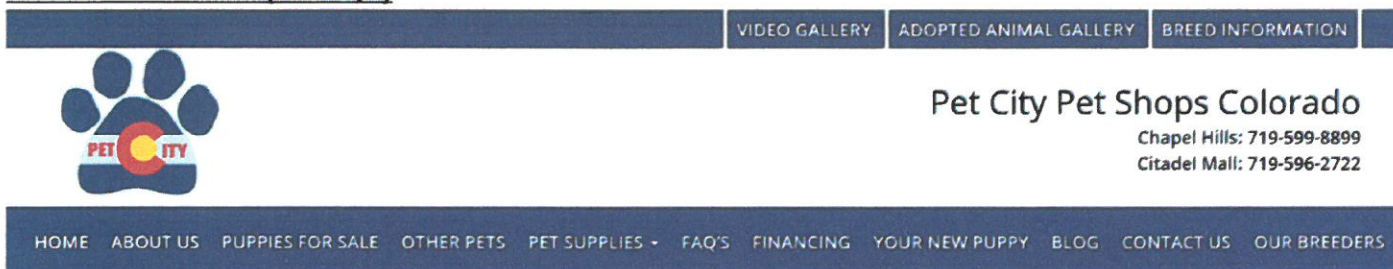
<sup>8</sup> The Humane Society of the United States; The Horrible Hundred 2018: A sampling of problem puppy mills and puppy sellers in the United States, May 2018

<sup>9</sup> The Humane Society of the United States; 101 Puppy Mills: A Sampling of Problem Puppy Mills in the United States, May 2014



<b>Pet Store Name:</b>	<b>Pet City Citadel</b>
<b>Owner:</b>	Baja, Inc. <sup>1</sup>
<b>Store Address:</b>	Citadel Mall 750 Citadel Dr E, Colorado Springs, CO 80909
<b>Store Phone:</b>	(719) 596-2722
<b>Owner Contact:</b>	Bree Maestas, President/Owner <sup>1</sup>
<b>Contact Address:</b>	4130 Dunbarton Ln, Colorado Springs, CO 80909 <sup>2</sup>
<b>Pet Store Website:</b>	<a href="http://www.petcitypetshops.net/our-breeders/">http://www.petcitypetshops.net/our-breeders/</a>

### Pet Store Website (Excerpt)



The screenshot shows a dark blue navigation bar with the following links: VIDEO GALLERY, ADOPTED ANIMAL GALLERY, BREED INFORMATION. Below the navigation bar is the Pet City logo, which consists of a blue paw print with a red and yellow circle in the center, and the words "PET CITY" in red and yellow. To the right of the logo, the text reads "Pet City Pet Shops Colorado" followed by "Chapel Hills: 719-599-8899" and "Citadel Mall: 719-596-2722". At the bottom of the screenshot is a dark blue footer bar with the following links: HOME, ABOUT US, PUPPIES FOR SALE, OTHER PETS, PET SUPPLIES, FAQ'S, FINANCING, YOUR NEW PUPPY, BLOG, CONTACT US, OUR BREEDERS.

### What We Require from our Breeders

Throughout the years, Pet City Pet Shops have been in business, we have been leaders and pioneers in encouraging the betterment of breeders. The breeders that Pet City chooses to work with are not only required to meet all Federal, State and Local Laws, but meet a list of our own stringent rules and restrictions.

- USDA and/or State Licensed
- Hobby breeder, as defined by the Animal Welfare Act (AWA), who raise their dogs in a humane manner<sup>3</sup>

In addition to the required licensing we demand our breeders provide the following things for our pets:

- A consulting veterinarian providing good medical care. The vet must create a written program for the breeder to follow and ensures [sic] the health of the dogs.
- The breeder must maintain written veterinarian records of medical care, as it is performed.
- The breeder must provide vaccinations against diseases and parasites.
- Safe and comfortable housing
- Frequent socialization and exercise
- State-issued health certification
- Every puppy that is sold must have a state issued health certificate from the state of origin. It must be signed and attested by a licensed veterinarian.

How we choose where to get our puppies...

- Pet city visits inspects [sic] breeders to ensure they meet our standards. We work with local, state and federal regulatory agencies and legislators concerning animal welfare issues and education.
- Our processes are on-going and transparent. We investigate claims about breeder facilities that don't meet our requirements. This is our business and we take it seriously.





**Where Pet City Citadel puppies really come from:<sup>4</sup>**

The bottom line... **80%** of puppies **Pet City Citadel** purchased from outside Colorado during the last three-and-a-half years are **from breeders with histories of violations of the Animal Welfare Act, puppy mill puppy brokers and puppy mills named as among the nation’s worst by the Humane Society of the United States (HSUS).**<sup>5</sup>

Breeder/Broker	Number of Dogs Bought from Outside Colorado 1/1/2016 - 6/30/2019	
	Total	% of Total
Large-Scale Breeder, History of Violations	544	42%
Puppy Mill Puppy Broker	255	20%
HSUS Horrible Hundred Puppy Mill	187	14%
Other Breeder	177	14%
Large-Scale Breeder	89	7%
Breeder with History of Violations	48	4%
<b>Grand Total</b>	<b>1,300</b>	<b>100%</b>

The breeders, puppy mill puppy brokers and Horrible Hundred puppy mills that make up the above are detailed in the table below and described individually thereafter.

Breeder/Broker		Number of Dogs Bought from Outside Colorado 1/1/2016 - 6/30/2019	
		Total	% of Total
Lorilee Thomas	Large-Scale Breeder, History of Violations	396	30%
Nebraskaland Pets	Puppy Mill Puppy Broker	199	15%
Joyce Cairns	HSUS Horrible Hundred Puppy Mill	156	12%
Crystal Howard	Large-Scale Breeder, History of Violations	117	9%
Tiffanie's LLC	Puppy Mill Puppy Broker	56	4%
Lewis Bloom	Large-Scale Breeder	39	3%
Shelli Kershner	HSUS Horrible Hundred Puppy Mill	25	2%
Becky Mosshart	Large-Scale Breeder, History of Violations	16	1%
Other (83 breeders, individually < 1.2%)		296	23%
<b>Grand Total</b>		<b>1,300</b>	<b>100%</b>

• **Lorilee Thomas**

- Operates a facility with **642 adult breeding dogs, and 228 puppies**. She sells to pet stores all over the country and has a history of violations.<sup>6</sup>
- According to USDA inspection notes, violations include:<sup>7</sup>
  - Broken wire mesh with sharp points
  - Metal screws with sharp points in whelping box
  - Evidence of rodent activity
  - Hair and other excreta trapped in jagged sections of metal crates, bottom of plastic feeder, metal food receptacles, water lines and plastic structures
  - Toxic products stored on shelf directly above food storage area
  - Yorkshire terrier was found with excessively matted hair, balled and adhering to the skin.
  - Shih Tzu was found with a cloudy, opaque appearance on its left eye.
  - Several Chihuahuas were found to have excessively long toe nails, hair loss, thinning hair and reddened skin.



- **Nebraskaland Pets (Angie/Casey Schaff; Big Red Country Kennels)**
  - Nebraskaland Pets is a puppy mill puppy broker and breeder whose primary business is buying puppies from puppy mills and reselling them to pet stores. The use of puppy mill brokers makes it difficult if not impossible for a pet store or the public to know who a puppy's breeder actually was. This would also make it difficult if not impossible for Pet City Citadel to "...inspect breeders to ensure they meet [their] standards."
  - Nebraskaland Pets has been buying and reselling puppies from one of the largest and worst puppy mills in Minnesota since, at least, 2011.<sup>6</sup>
  - Nebraskaland Pets also operates a breeding facility with **202 adult dogs**.<sup>6</sup>
  - Since 2016, Nebraskaland Pets has sold nearly 5,400 puppy mill puppies to Colorado pet stores, making it the largest single out-of-state seller of puppy mill puppies to Colorado's pet stores, including Pet City Citadel.
  
- **Joyce Cairns (Unicorn Kennels)**
  - Joyce Cairns was named one of 2018's Horrible Hundred puppy mills by the Humane Society of the United States (HSUS). In its May 2018 report,<sup>8</sup> the HSUS noted:
    - Repeated violations for dogs in need of veterinary care; emaciated corgi found listless, with spine visibly protruding; Pekingese in need of surgery was not treated effectively more than six months later. Conditions at Unicorn Kennel appear to belie its fanciful name.
    - Severe animal welfare issues were found at the kennel within the last year, both by USDA and state inspectors, with the USDA finding at least nine animals in need of veterinary care during three visits in 2017 alone.
    - On December 13, 2017, a USDA inspector gave Cairns a "Direct, Repeat" violation - one of the most serious types of USDA citations - for multiple dogs in need of veterinary care, just three months after four other dogs had been found in need at her kennel. The dogs noted on the December report included two dachshunds with signs of advanced dental disease, including one who had so much dental calculus on some of her teeth that it "causes a visible bulge to the face when the dog's mouth is closed." Both dogs had loose teeth and a pus-like [*sic*] discharge on the gumline. In addition, the inspector found a Pekingese with signs of an ocular disorder; the white part of her eye was red, there was greenish discharge, and the cornea was dull and uneven. The inspector also found unprotected heat lamps that were dangerously close to whelping dogs.
    - Three months earlier (September 6, 2017), a USDA inspector found four other dogs in need of veterinary care, including an emaciated corgi and a Pekingese named Blondie, whom the owner had been directed to get care for in February, and who had still not been adequately treated more than six months later.
    - The September inspection also noted an update on two other dogs who had been found in need of veterinary care during a February inspection, stating they had been evaluated by a veterinarian, but did not specify whether the dogs had recovered. The third dog identified in the February inspection was Blondie, the Pekingese with severely thickened ear tissue, who was found in September to be still suffering from the same condition.
    - The kennel is also inspected by the Kansas Department of Agriculture. The kennel failed a February 2018 state inspection due to numerous problems, including excessive feces, a strong odor and three dogs who needed care: a poodle with missing fur, a cockapoo who was matted and an Australian shepherd who was "thin" and "under vet supervision."



- Unicorn Kennel also failed a state inspection on January 18, 2017, when dogs were found standing in wet, dirty enclosures with excessive feces, and two additional dogs were found in need of veterinary care.
- The state inspection in February 2018 showed that Cairns had approximately **200 dogs and puppies** at her puppy mill.
  
- **Crystal Howard (Best of the Best)** - puppy mill with **48 adult breeding dogs**.<sup>6</sup>
  
- **Tiffanie's LLC (Tiffanie Kurz)**
  - "Tiffanie's LLC is a massive Missouri dog broker..."<sup>8</sup> The use of puppy mill brokers makes it difficult if not impossible for the public to know who a puppy's breeder actually was.
  - Tiffanie's LLC also operates a breeding facility with over **229 puppies** on their property. Violations include keeping puppies in kennels that are too small.<sup>6</sup>
  
- **Lewis Bloom (Bloom's Kennels)**
  - Operates a facility with **64 adult breeding dogs**.<sup>6</sup>
  
- **Shelli Kershner (Walnut Creek Kennel)**
  - Shelli Kershner was named one of 2014's Horrible Hundred puppy mills by the HSUS.
  - In its May 2014 report,<sup>9</sup> the HSUS noted:
    - In August 2013, the USDA gave Kershner an official warning for a repeated failure to provide adequate veterinary care and a repeated failure to provide safe housing for her breeding dogs.
    - But even after this warning, in October 2013, a USDA inspector found a Shih-Tzu with her eye crusted shut and a "pink, fleshy protrusion" in the center of the eye.
    - There was another incident earlier in the year when a dog was found with "long toenails and reddened, bloody gums."
    - In August 2012, the USDA found **109 dogs** at the kennel when its official records listed only 64, indicating that this B dealer was getting dogs from undocumented sources, which could include unlicensed puppy mills.
    - When the USDA returned in February 2014 to check on the kennel, they were not given access, which is a violation.
  
- **Becky Mosshart (Rebecca Mosshart, Sam Mosshart, SBM Kennels)**
  - Becky Mosshart is a large-scale pet broker and breeder whose primary business is buying puppies from puppy mills and reselling them to pet stores,<sup>6</sup> including the store she owns in Fort Collins, Colorado.
  - Becky Mosshart also operates a facility with **211 adult breeding dogs and 150 puppies**.<sup>6</sup>
  - Mosshart has a long list of violations including: Dogs standing on hard wire flooring, standing water in outdoor kennels (spilled), excessive flies, kennels so rusted there are holes, beetles crawling through food dishes, food bowls have excessive grime/oil buildup, dogs couldn't access food and water without walking through excessive feces.<sup>6</sup>
  - Mosshart is an opponent of a new Kansas law regulating rescues and breeders. She doesn't want surprise inspections.<sup>6</sup>



In 2017, the USDA significantly reduced the transparency of its public Animal Welfare Act records by redacting information to conceal the subjects of these records. According to the 2019 Horrible Hundred report of the Humane Society of the United States, "Without this information, the HSUS and the general public cannot evaluate whether USDA is meeting its charge. Additionally, consumers cannot judge whether or not they are supporting an operation which has been found employing the harmful practices described in this report. Moreover, the lack of transparency can be a hindrance to law enforcement efforts in jurisdictions that rely on inspection reports to determine compliance with state and local laws."

With the limited information available, neither the 2018 nor 2019 Horrible Hundred report includes any additional findings related to the breeders in this report.

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<sup>1</sup> PACFA Active Facilities List September 2019

<sup>2</sup> Colorado Secretary of State website ([state.co.us](http://state.co.us)) September 2019

<sup>3</sup> Hobby breeders are exempt from the AWA as well as the laws and regulations of at least 19 states (<https://www.cga.ct.gov/2013/rpt/2013-R-0309.htm>)

<sup>4</sup> A key source for tracking the origins of an animal is the Certificate of Veterinary Inspection (CVI). Before an animal is transported from one state to another, a veterinarian accredited by the United States Department of Agriculture (USDA) must examine the animal for signs of infectious, contagious or communicable disease and, if no disease is found, sign the certificate for approval to transport. The State of Colorado does not require any comparable documentation be issued for animals being transported within the state, but does keep records of CVIs associated with animals entering the state from other states. For purposes of preparing this and other reports, 3CW has accumulated these inter-state CVIs for all dogs entering Colorado from January 1, 2016 through June 30, 2019. The tables and discussion in this report are based only on the subject pet store's out-of-state puppy purchases as records of in-state purchases are not available.

<sup>5</sup> Sources: The Humane Society of the United States' Horrible Hundred Puppy Mills reports 2013 - 2019, and Bailing Out Benji website ([bailingoutbenji.com](http://bailingoutbenji.com)) as of September 2019. Where a breeder is not included in the HSUS reports or on the Bailing Out Benji website, 3CW has assigned the category "Other Breeder".

<sup>6</sup> Bailing Out Benji website ([bailingoutbenji.com](http://bailingoutbenji.com)) September 2019

<sup>7</sup> ASPCA website <https://nopetstorepuppies.com/dog-breeder/thomas-lorilee-chris-and-featherston-opal> September 2019

<sup>8</sup> The Humane Society of the United States; The Horrible Hundred 2018: A sampling of problem puppy mills and puppy sellers in the United States, May 2018

<sup>9</sup> The Humane Society of the United States; 101 Puppy Mills: A Sampling of Problem Puppy Mills in the United States, May 2014



<b>Pet Store Name:</b>	<b>Pet City Fort Collins</b>
<b>Owner:</b>	A Best Friend, LLC <sup>1</sup>
<b>Store Address:</b>	3663 S. College Avenue #10, Fort Collins, CO 80525
<b>Store Phone:</b>	(970) 223-5318
<b>Owner Contact:</b>	Rebecca (Becky) Mosshart <sup>1</sup>
<b>Contact Address:</b>	2332 CR 31, Protection, KS 67127 <sup>2</sup>
<b>Contact Phone:</b>	(620) 622-4431 <sup>2</sup>
<b>Pet Store Website:</b>	<a href="https://www.petcityfortcollins.com/">https://www.petcityfortcollins.com/</a>

**Pet Store Website (Excerpt):**



HOME ABOUT AVAILABLE PETS FOREVER HOMES PRODUCTS CONTACT US

Everything we do centers on providing the best family pets possible.

We use over 100 USDA regulated, out-of-state breeders. This large number of breeders allows our store access to many different breeds of dogs. We use out-of-state breeders because the puppies must be checked by a vet to enter Colorado, providing additional confidence in the health and care of our dogs.

We keep our puppies up-to-date on vaccinations and de-worming. We also guarantee our dogs against congenital or hereditary defects and diseases, which speaks to the quality of breeders we use. By selling healthy puppies we are attempting to reduce the initial and long-term health-related costs of ownership. We believe that this is a step toward ensuring that a pet owner can afford to care for their dog for its entire life. Additionally, we encourage pet owners to spay and neuter their dogs.

We also offer the benefit of a well socialized animal. Puppies are handled and loved by staff and customers and have a kennel mate. This means that our puppies become well socialized with people as well as other dogs. This makes for an easier time transitioning into a home as well as increased trainability. Socialized puppies are more likely to fit into the home environment and stay there. We also encourage customers to come to us with questions, so that we can make the transition to home as easy as possible.

**Where Pet City Fort Collins' puppies *really* come from:**<sup>3</sup>

The bottom line... **99%** of puppies **Pet City Fort Collins** purchased during the last three-and-a-half years are from puppy mill puppy brokers, including the owner herself, large-scale breeders with histories of violations of the Animal Welfare Act and puppy mills named as among the nation's worst by the Humane Society of the United States (HSUS).<sup>4</sup>

Breeder/Broker	Number of Dogs Bought from Outside Colorado 1/1/2016 - 6/30/2019	
	Total	% of Total
Puppy Mill Puppy Broker	882	61%
Large-Scale Breeder, History of Violations	392	27%
HSUS Horrible Hundred Puppy Mill	162	11%
Other Breeder	14	1%
<b>Grand Total</b>	<b>1,450</b>	<b>100%</b>



The puppy mill puppy brokers, large-scale breeders and Horrible Hundred puppy mills that make up the summary on the previous page are detailed below and described individually thereafter.

Breeder/Broker		Number of Dogs Bought from Outside Colorado 1/1/2016 - 6/30/2019	
		Total	% of Total
Crittersville	Puppy Mill Puppy Broker	882	61%
Becky Mosshart	Large-Scale Breeder, History of Violations	372	26%
Rebecca Eiler	HSUS Horrible Hundred Puppy Mill	84	6%
Lewis Bloom	Large-Scale Breeder, History of Violations	20	1%
<b>Grand Total</b>		<b>1,450</b>	<b>100%</b>

- **Crittersville (Brian Warren)**

- Crittersville is a puppy mill puppy broker and breeder whose primary business is buying puppies from puppy mills and reselling them to pet stores. The use of puppy mill brokers makes it difficult if not impossible for the public to know who a puppy’s breeder actually was.
- Crittersville sources puppies from puppy mills that have been named the worst in the nation no fewer than **15** times. This large-scale broker also sources puppies from breeders with multiple known violations of the USDA’s Animal Welfare Act.<sup>5</sup>
- Crittersville has also previously sold puppies with parvo to pet stores.<sup>5</sup>
- Since 2016, Crittersville has sold nearly 4,000 dogs to Colorado pet stores, nearly one-quarter of which were bought by Pet City Fort Collins.

- **Becky Mosshart (Rebecca Mosshart, Sam Mosshart, SBM Kennels)**

- Becky Mosshart is a puppy mill puppy broker and large-scale breeder with a history of violations of the Animal Welfare Act. She is also the owner of Pet City Fort Collins.
- As a breeder, Becky Mosshart operates a facility with **211 adult breeding dogs and 150 puppies**.<sup>5</sup>
- Mosshart has a long list of violations including: Dogs standing on hard wire flooring, standing water in outdoor kennels (spilled), excessive flies, kennels so rusted there are holes, beetles crawling through food dishes, food bowls have excessive grime/oil buildup, dogs couldn’t access food and water without walking through excessive feces.<sup>5</sup>
- Mosshart is an opponent of a new Kansas law regulating rescues and breeders. She doesn’t want surprise inspections.<sup>5</sup>

- **Rebecca Eiler (Creekside Kennel)**

- Co-owner with Lizzan and Daniel Miller, named one of 2014’s Horrible Hundred puppy mills by the HSUS.
- In its May 2014 report,<sup>6</sup> the HSUS noted:
  - USDA inspectors documented problems at this kennel at seven different visits in 2013 alone, including three visits during which the operator failed to make the premises available for inspection, expired and unlabeled drugs kept for use on the dogs, dogs in the cold without adequate protection from the elements, excessive amounts of feces and dogs with solid ice in their water bowls who “were observed sticking their nose in one of the water receptacles and aggressively pawing at the solid ice inside of it,” according to the inspector (12/10/13). The inspector noted that when the operator gave some of the dogs fresh water, they “drank continuously for over a minute and appeared extremely thirsty.” At that point, the licensee admitted to the inspector that the dogs were last given



water at 7:00 am, and the solid ice was found in the afternoon, indicating that the dogs had gone many hours without drinkable water.

- Creekside Kennel is a puppy mill with **258 adult breeding dogs**.<sup>5</sup>

- **English Sage, LLC (Sharon Curless; Ruff Pine Kennel)**

- Ruff Pine Kennel was named one of 2013's Horrible Hundred puppy mills by The Humane Society of the United States. According to the HSUS report:<sup>6</sup>
  - USDA inspections found several dogs to have died without adequate veterinary treatment.
  - In 2008, Curless was cited for failure to provide adequate veterinary care to two Pomeranians who were in a fight with another dog; both died the next day without ever seeing a vet.
  - In 2007, a pug died after the owner noticed abnormal tissue protruding from her vaginal area; the pug had not been seen by a vet.
  - This kennel was cited multiple times in 2012 and earlier for dogs in need of veterinary care, dogs with inadequate shelter from the wind, rain and cold, and housing in disrepair.
  - Ruff Pine Kennel received an official warning from the USDA in December 2012 for violations of the Animal Welfare Act regulations. As of 2012, Ruff Pine Kennel housed approximately **180 dogs and puppies**.

- **Lewis Bloom (Bloom's Kennels)**

- Operates a facility with **64 adult breeding dogs**.<sup>5</sup>
- Bloom has history of violations including missed inspections and walls and kennel floors covered in grime and feces.<sup>5</sup>

In 2017, the USDA significantly reduced the transparency of its public Animal Welfare Act records by redacting information to conceal the subjects of these records. According to the 2019 Horrible Hundred report of the Humane Society of the United States, "Without this information, the HSUS and the general public cannot evaluate whether USDA is meeting its charge. Additionally, consumers cannot judge whether or not they are supporting an operation which has been found employing the harmful practices described in this report. Moreover, the lack of transparency can be a hindrance to law enforcement efforts in jurisdictions that rely on inspection reports to determine compliance with state and local laws."

With the limited information available, neither the 2018 nor 2019 Horrible Hundred report includes any additional findings related to the breeders in this report.



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- <sup>1</sup> PACFA Active Facilities List September 2019
  - <sup>2</sup> Certificates of Veterinary Inspection (CVIs) filed by Ms. Mosshart with the State of Colorado
  - <sup>3</sup> A key source for tracking the origins of an animal is the Certificate of Veterinary Inspection (CVI). Before an animal is transported from one state to another, a veterinarian accredited by the United States Department of Agriculture (USDA) must examine the animal for signs of infectious, contagious or communicable disease and, if no disease is found, sign the certificate for approval to transport. The State of Colorado does not require any comparable documentation be issued for animals being transported within the state, but does keep records of CVIs associated with animals entering the state from other states. For purposes of preparing this and other reports, 3CW has accumulated these inter-state CVIs for all dogs entering Colorado from January 1, 2016 through June 30, 2019. The tables and discussion in this report are based only on the subject pet store's out-of-state puppy purchases as records of in-state purchases are not available.
  - <sup>4</sup> Sources: The Humane Society of the United States' Horrible Hundred Puppy Mills reports 2013 - 2019, and Bailing Out Benji website ([bailingoutbenji.com](http://bailingoutbenji.com)) as of September 2019. Where a breeder is not included in the HSUS reports or on the Bailing Out Benji website, 3CW has assigned the category "Other Breeder".
  - <sup>5</sup> Bailing out Benji website ([bailingoutbenji.com](http://bailingoutbenji.com)) September 2019
  - <sup>6</sup> The Humane Society of the United States; A Horrible Hundred: Problem Puppy Mills in the United States, May 2013



Pet Store	Total Number of Dogs Bought				
	2016	2017	2018	1H 2019	Total
Pet City - Aurora (aka Spiffy Pets)	666	1,257	1,702	723	4,348
Pet Ranch	590	862	1,042	550	3,044
Perfect Pets	239	728	1,083	638	2,688
Just Pets	258	652	905	519	2,334
Pet City - Baja	346	479	318	157	1,300
Pet City - Fort Collins	181	430	568	271	1,450
Puppies N Stuff	179	390	684	338	1,591
Pet Paradise	112	229	419	212	972
Pet City - Chapel Hills	39	201	196	225	661
Aquatic Dog	74	118	177	82	451
Sophia's Pet Paradise	11	60	47	12	130
Town & Country Pet Center	74	99	93	42	308
Valley Pets	18	38	76	57	189
Classy Pets	-	40	73	39	152
Western Fancy Pups	-	2	-	-	2
<b>Total All Pet Stores</b>	<b>2,787</b>	<b>5,585</b>	<b>7,383</b>	<b>3,865</b>	<b>19,620</b>

Colorado Citizens for Canine Welfare (3CW)  
Puppy Mill Report  
Raw Data

<u>% of Total</u>	<u>Source</u>	<u>Number of Dogs from Largest Colorado Pet</u>		
		<u>2016</u>	<u>2017</u>	<u>2018</u>
22%	Puppy Mill Puppy Broker	1,897	3,114	4,070
16%	HSUS Horrible Hundred Puppy Mill	694	1,093	1,255
14%	Large-Scale Breeder, History of Violations	87	959	1,155
12%	Other Breeder	61	254	405
7%	Large-Scale Breeder	46	100	216
7%	Breeder with History of Violations	-	60	139
8%	Unlicensed Breeder	2	5	143
5%	<b>Total</b>	<b>2,787</b>	<b>5,585</b>	<b>7,383</b>
3%				
2%	Total All Pet Stores	2,787	5,585	7,383
1%	Difference	-	-	-
2%				
1%				
1%				
0%				
<b>100%</b>				

**Dogs Purchased by  
Stores from Other States**

<b>1H 2019</b>	<b>Total</b>	<b>% of Total</b>
2,326	11,407	58%
520	3,562	18%
494	2,695	14%
244	964	5%
171	533	3%
72	271	1%
38	188	1%
<b>3,865</b>	<b>19,620</b>	<b>100%</b>

3,865

-

**Colorado pet store purchases of out-of-state puppy  
source as a % of dogs bought from outside Colorado**

<b>Source</b>	<b>2016</b>	<b>2017</b>
Puppy Mill Puppy Broker	68%	56%
HSUS Horrible Hundred Puppy	25%	20%
Large-Scale Breeder, History of	3%	17%
Other Breeder	2%	5%
Large-Scale Breeder	2%	2%
Breeder with History of Violation	0%	1%
Unlicensed Breeder	0%	0%
<b>Total</b>	<b>100%</b>	<b>100%</b>

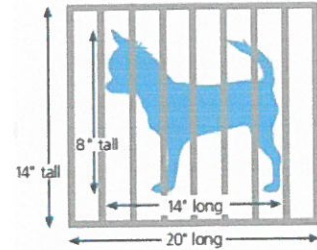
ies for resale by type of  
do.

<b>2018</b>	<b>1H 2019</b>	<b>Total</b>
55%	60%	58%
17%	13%	18%
16%	13%	14%
5%	6%	5%
3%	4%	3%
2%	2%	1%
2%	1%	1%
<b>100%</b>	<b>100%</b>	<b>100%</b>

## USDA'S LOW STANDARDS AND POOR ENFORCEMENT

### A USDA-licensed facility may legally:

- ✓ Confine dogs in cages only 6 inches larger than their bodies for their entire lives
- ✓ Provide only coated wire flooring in cages
- ✓ Deny dogs adequate exercise and socialization
- ✓ Keep dogs in frigid or sweltering temperatures for up to 4 hours
- ✓ Breed dogs repeatedly and excessively, without limits
- ✓ Provide no regular veterinary care beyond annual walk-through of facility



The USDA admits that a USDA license means very little. On its website the USDA noted: “We do not ‘certify’ establishments. . . a USDA license is not a ‘seal of approval’ but rather a legal designation that a facility has successfully passed its pre-license inspection and is legally entitled to use regulated animals for regulated activities.”

**USDA’s Enforcement Of Animal Welfare Laws Plummeted In 2018, Agency Figures Show.**<sup>1</sup> This was the heading of a feature story in *The Washington Post* in October 2018 that reported the USDA was issuing significantly fewer written warnings than in previous years and had settled only one complaint. The USDA told the publication this was in part due to “working more closely with alleged violators” rather than taking enforcement actions, a clear indication that the USDA no longer sees its role as a regulator of licensees.

**As of January 2019, the USDA continues to protect animal abusers by hiding the names and license numbers on commercial breeder inspection reports from the public.** In February 2017, the USDA abruptly removed inspection reports from its website. Some reports have been restored, but breeder names, business names and license numbers are blacked out so neither the public nor state enforcement agents can connect breeders with violations. As such, the public remains in the dark about animal mistreatment at specific commercial breeding facilities.

**In 2010 the USDA audited itself, and the Office of Inspector General released a report** stating that the enforcement process was ineffective against problem dealers, inspectors did not cite or document violations properly as needed to support enforcement actions, penalties were minimal, and inspectors allowed facilities to operate unimpeded, year after year, despite repeat violations. Photos in the report show horrific cruelty. Recent data indicates this problem remains.

**The HSUS’s annual Horrible Hundred reports, including the report released in May 2018,** have documented instances of breeders with numerous and egregious USDA violations spanning many years who remain licensed.

### Other recent steps in the wrong direction include:

- May 2018: A USDA tech note explained that facilities can now self-report to avoid having certain violations identified in the records, even some critical violations, if they follow certain guidelines.
- April 2018: USDA announced a pilot program that will alert some facilities about upcoming inspections in advance. This allows breeders time to cover up violations or even hide sick or injured dogs.
- April 2018: USDA confirmed to the HSUS that it had not revoked a single dog breeder license in the last year, despite overwhelming evidence of animal mistreatment and poor conditions at many operations.
- January 2018: USDA announced a proposal to allow third party groups to inspect puppy mills. This would have allowed industry groups that have a financial stake in perpetuating puppy mills to be part of the inspection process, which would be like putting a fox in charge of a henhouse. The proposal was abandoned in May 2018 due to widespread opposition.

<sup>1</sup> [https://www.washingtonpost.com/science/2018/10/18/usdas-enforcement-animal-welfare-laws-plummeted-agency-figures-show/?utm\\_term=.9e2ec9b47f39](https://www.washingtonpost.com/science/2018/10/18/usdas-enforcement-animal-welfare-laws-plummeted-agency-figures-show/?utm_term=.9e2ec9b47f39)