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**(No. 37) – What Needs to be Done About the Puppy Mills**

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# REPORT TO HUMANITARIANS

Number 37 — September, 1976

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*Humane Information Services*  
Incorporated

A NON-PROFIT NATIONAL HUMANE SOCIETY  
FOR THE PREVENTION OF ANIMAL SUFFERING

4495 Ninth Avenue North  
St. Petersburg, Florida 33713

Dues and Contributions Tax Deductible

In *Report to Humanitarians No. 36* (June, 1976) appeared a comprehensive description of the inhumane conditions in puppy mills and the commercial trade in dogs. There also was an analysis of the effects of these conditions upon purchasers of pet animals, pet animal shelters and public pounds, pet shops, legitimate breeders, and the production of surplus dogs. The following discussion of alternative remedial measures cannot be fully understood by anyone who has not read the previous description and analysis.

As we begin this analysis of how to eliminate the multitude of undesirable features of the puppy mills and the commercial trade in pet animals, we realize that it is such a complicated subject that no adequate understanding of the problem can be conveyed in a brief article. A few advocates of brevity and simplicity undoubtedly will let us know that they couldn't take the time to read this comprehensive analysis. That is exactly why humanitarians tend to scratch only the surface of humane problems and flit from one thing to another always in search of some new and sensational cruelty to cluck their tongues over. Those who cannot concentrate on one subject long enough to read this report certainly will contribute little or nothing to solution of the problem.

The atrocious conditions existing in the commercial pet animal trade can be remedied. But it will require concerted action by humanitarians, humane societies and dog breeders to effect the necessary action. Merely describing what goes on will not help much unless this is followed by action.

## OBJECTIVES

Before it becomes possible to deal with a problem by legislation or other action it is necessary to establish specific major objectives. These may not be exactly what we would like to accomplish, but what is desirable and potentially achievable.

(1) The breeding for sale of "purebred" dogs should be in the hands of  
Following publication of our report on puppy mills we received a protest about our use of the term "purebreds" from John W. Patten, of 250 West 2nd Avenue, Apartment 216, Roselle, New Jersey 07203, author of an excellent printed statement on the subject: "Just because the AKC refers to the canines it registers as 'purebreds' is no reason for your good self to do so. No domesticated quadruped may be correctly referred to as having pure breeding. If the requisites of a breed registry are followed, such an animal may be referred to as 'registered.' If one wants to indicate it is of full breeding, apart from the word registered, then it is correctly referred to as a fullbred. It is high time that the word 'purebred' be eliminated from the language."

We agree with Mr. Patten, but we certainly do not carry enough weight with breeders to influence their terminology. So, we will continue to use the term "purebred" to designate animals which are registrable fullbreds, since such usage will be less confusing to our readers.

"legitimate" breeders (see discussion in previous Report). This would eliminate the fly-by-night operators who have neither the know-how nor resources, much less the desire, to produce full-blooded, healthy animals for selected buyers. That would greatly benefit, not hurt, legitimate breeders, by reducing the competition from "cheapie" producers and protecting the standards which are designed to lead to maintaining and improving each breed. We want it to be distinctly understood by all readers of this analysis that we are not out "to get" legitimate breeders, but

suffer so much under existing conditions.

(2) The very inhumane conditions for "purebred" dogs and puppies existing among the commercial breeding establishments, bunchers, and pet shops must be drastically altered. Despite some legislation and voluntary efforts by a few humane societies and breed organizations, the situation has been growing worse, not better.

## What Needs to be Done About the Puppy Mills

While humanitarians have been raising Cain about a relatively small number of other animals for which conditions are generally far better than for the breeding animals and puppies in the commercial pet animal trade, the latter have continued to suffer by the hundreds of thousands annually with hardly any attention being paid to them.

(3) The tremendously important contribution made by this reprehensible trade in dogs to the continually increasing production of surplus pet animals must be stopped. This is the phase of the problem that has been most overlooked. But it is just as important as the elimination of suffering by the animals involved. No other suggested methods of eliminating the surplus will be effective unless we greatly reduce this growing source of unsterilized pet animals going into the hands of new owners who buy them specifically for the purpose of breeding still more puppies and kittens. The way in which we have neglected this phase of the problem is shown by the fact that practically all proposals for dealing with the puppy mills, transportation of puppies and operations of pet shops have been directed at improving the welfare of existing animals, not preventing new ones from being born.

## ALTERNATIVE REMEDIES

There are a number of different things that can be done by individuals and individual humane societies. But these individual actions will not crack the nut which is the total problem unless they are part of a definite program. This is a problem that positively requires cooperation, planning and concerted action. This article is designed to analyze the alternative programs available, and the kind of action that would be required to implement them.

## TRANSPORTATION

In 1976 the Congress passed the Foley bill, again amending the Animal Welfare Act by placing supervision of the air transport of animals primarily under the Animal and Plant Health Inspection Service (APHIS) of the US Department of Agriculture, which already had responsibility under the Act for the licensing of commercial breeders selling at wholesale and of dog dealers. We congratulate the members of our sister society, the National Association for Humane Legislation, and of other societies, whose letters to Washington helped so much to obtain passage of this legislation.

Humane Information Services and other humane societies have offered suggestions to APHIS for implementing the provisions of this important law.

The most important potential ways of reducing the suffering of puppies during transportation from mid-Western producers and bunchers to pet shops in the rest of the country are:

(1) Changing the actual conditions in the transportation system, such as the types of "containers" used for shipment, the kinds of transportation equipment used, pressure and temperature controls in

ing facilities, and for holding the animals at airports during transshipment and awaiting delivery to consignees, etc.

(2) Pre-shipment requirements including health certification and puppy age limitations. Although this is not generally recognized by humanitarians, who have placed almost total emphasis on the category (1) above, these pre-shipment requirements can contribute not only to a reduction in suffering of the puppies during transit, but also to important modifications of the commercial trade in puppies as well.

The new law gives the USDA sufficient authority to greatly reduce the puppy mill and pet shop trade in puppies, by setting a high minimum age for puppies that can be accepted for shipment. The law specifically mentions eight weeks as the minimum, or such other age as the Secretary (of Agriculture) may by regulation prescribe. It is our understanding that following hearings on standards and regulations, the USDA tentatively has accepted the eight weeks minimum mentioned in the Act. Humane societies seem to view this age as important only because it affects the ability of the puppies to withstand the rigors of shipment, and apparently not much effort was made to obtain a higher minimum age requirement.

But of even greater importance is the effect which a higher minimum age could have on the entire puppy mill trade. Pet shop sellers of these puppies fully realize that for impulse buyers the cute little ball of fluff that is a six to eight-week-old puppy is the main attraction. Beyond eight weeks the puppy loses much of its "baby" characteristics which so attract the impulse buyer. If the pet shops could offer only ten or 12-week-old puppies, sales of those progeny of the disgraceful puppy mills would be substantially reduced.

Moreover, the cost of feeding the puppies before they become the responsibility of new owners would be increased. This, also, would tend to put the mills and shops at a competitive disadvantage.

As the USDA gains experience and confidence in administering the new law, the humane societies should bring pressure on the agency to up the minimum age, perhaps by increments of two weeks with several years intervening. We believe that Humane Information Services may have been the only society to sufficiently stress this point in replying to the USDA invitation for suggestions. In the future, all societies should be alerted to the importance (See PUPPY MILLS, page 2, column 1)

September, 1976

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**PUPPY MILLS — FROM PAGE 1**

of a relentless push for a higher minimum age. Here is one of many aspects of the overall puppy mill problem that calls for united action.

The new law also provides for health certification of the puppies before shipment. Because of health regulations of some states, shippers already go through the motions of obtaining pre-shipment health certificates. But, for reasons discussed in the preceding article, this has been more or less a farce. The USDA should be constantly pressured to require effective health certification. Humane Information Services made some specific recommendations about this to the USDA in response to its invitation to comment. We do not yet know what the final outcome will be. For the moment, the state certificates will continue to be used. But if health certification is not permitted to continue to be a farce, it can affect not only the ability of the puppies to withstand shipment and subsequent handling, but also signally affect conditions for the breeding dogs and puppies in the puppy mills and, by raising costs of production, the competitive position of the puppy mills and pet shops.

**FEDERAL REGULATION OF PUPPY MILLS AND DEALERS**

The Animal Welfare Act, as amended in 1970, since then has provided for licensing and regulation of commercial breeders selling to dealers, and of animal dealers, by the APHIS of the USDA. To describe the principal provisions, we quote from an address by Dr. Dale F. Schwindaman, senior veterinarian in immediate charge of administering the Act, to the National Conference on Dog and Cat Control, February 3-5, 1976, in Denver, Colorado:

"Who must be licensed? Any person who for compensation buys, sells, or transports affecting commerce, except as a common carrier, any animal for purposes of research, exhibition or for use as pets. However, the retail pet store is exempt unless such retail pet store sells animals to a dealer, an exhibitor, or a research facility. This definition, if interpreted in a strict sense, would include all purebred dog and cat breeders who sell animals as pets. However, after receiving a clarification from Congress, the Department determined that it was not the intent of Congress to include the purebred dog and cat breeder who sells animals at retail only. We license only those persons whose activities involve animals sold as pets at the wholesale level. Persons exempt from

licensing under the Act include retail pet stores who sell those animals normally considered as pets and do not sell species from the wild state, animal breeders who sell only at the retail level, the individual farmer or pet owner who sells an occasional litter, the state, county or municipal pounds and shelters, institutions supported by state appropriated funds and the strictly federal institutions.

(Thus, breeders or dealers who sell only at retail are excluded. The dog dealer whose atrociously bad treatment of the animals he handled, as disclosed by the famous raid on his premises which was reported in Life magazine, led to passage of the original Animal Welfare Act of 1966, is said to be still doing business, because he now claims to sell only at retail!)

"What must the USDA licensed producer and supplier do? They must comply with all USDA regulations and standards. Under the regulations, they are required to identify and maintain records on USDA forms of all animals bought, sold, transported or held. Dogs and cats must be individually identified. They must pay an annual licensing fee which is graduated and based on their gross dollar volume of business. They must submit an annual report of their animal activities. They must hold dogs and cats for a period of 5 business days after acquisition and 1 calendar day if acquired from another USDA licensed dealer. They must allow USDA representatives access to their premises and records to make compliance inspections. They must allow USDA representatives and duly authorized law enforcement officers access to look for missing animals, and they must comply with the standards.

"What are the standards? The minimum standards with which they must comply are both general and specific requirements with relation to housing, feeding, watering, sanitation, ventilation, separation by species, shelter from extremes of weather and temperature, handling and adequate veterinary care. So you can see that the USDA licensed producer and supplier is not a person who can always do what he or she chooses.

**ENFORCEMENT OF THE ACT**

"What about USDA enforcement? Veterinary Services, which is my agency in USDA responsible for administering the Act, has 640 veterinarians and 798 technicians as employees. Of these employees, 376 veterinarians and 708 technicians are involved in field work conducted under the AWA. Field work related to this program involves about 6% of their time for a total of 63 man years. The balance of their time is devoted to other animal disease eradication and control programs administered by Veterinary Services. Because of problems which I will identify later, we have established program priorities. The first priority is investigating and responding to legitimate complaints received from many sources. Second, bring about compliance or document alleged violations of known violators of the Act. Third, license new dealers which are found or come to our attention. Fourth, monitor dealer shipments and other activities at airports, and fifth, conduct unannounced compliance inspections of premises and records of which we did approximately 19,000 during calendar year 1975.

"I would like to give you a little better idea of our enforcement activities by presenting the following information. It is the policy of USDA to bring about compliance with our regulations and standards rather than prosecute individuals. Since the inception of the program, we have had 503 alleged violations documented. Of these, 269 were submitted during calendar year 1975 which I feel reflects the emphasis on compliance with the standards and, particularly, with the shipping requirements. In many instances, several alleged violations are combined into one case for possible prosecution. With this in mind, we have submitted 160 cases to our legal counsel. Eighty-four have been prosecuted through civil and criminal action. Seventy-six are still being reviewed by courts.

mitted, 254 have been closed by legal action, letters of warning, or were dropped because of insufficient evidence to successfully prosecute.

"Currently, we have licensed 7146 dealers under the Act. Of these, 1850 have been cancelled because the licensee could not comply with USDA's requirements, they were advised of possible legal action or they were voluntarily surrendered by the licensee. This leaves about 5300 active licensed dealers. We have licensed 1260 exhibitors with 745 in an active status and 515 exhibitor's licenses dropped or cancelled for the same reason as the dealers. The Department has registered 998 research facilities (one registration in some cases being an entire state university or college system) involving about 2300 sites or locations. We have about 550 active registered exhibitors. The total number of premises or animal locations inspected by USDA is approximately 9000. You can see that our field activity is quite extensive.

"What are the problems and what is being done or what can be done? As you might expect, the biggest problem for USDA is the limitation on money and manpower. For example, prior to FY 1972, our base appropriation from Congress before administrative overhead and other services were deducted was \$1.2 million. At that time, we had an average monthly listing of 210 licensed dealers and 850 registered research facilities involving 1500 research facility sites. We were able to make inspections twice a month of dealer's premises and once a month inspection of research facilities. Since FY '72, our base appropriation has been and still is \$2.1 million before administrative overhead and other services, leaving about \$1.54 million available for field activities. With this budget, we are able to make inspections of the previously mentioned 9000 licensee's and registrant's premises on a national average frequency of 2 times a year. This is not helping the producer and supplier and certainly not the consumer. Animal Care Staff requests for additional budget increases to administer the program have repeatedly been turned down. It seems that if the covered industries and the concerned public wish to have more USDA activity and closer supervision and enforcement, they will have to advise their respective Senators and Congress persons of their wishes.

"The second major problem is obtaining uniformity of interpretation and application of the regulations and standards by USDA field personnel. This is not meant to degrade our field personnel. They have, in general, done an excellent job with the information they had at hand and the time they had available for animal welfare program activity. But, associated with this lack of knowledge and experience is the problem now of bringing into compliance or taking the necessary corrective action to bring the small (HIS comment: ?) percentage of USDA substandard dealers into compliance with USDA requirements. Psychologically, this is a tough thing for some of our employees to do because of having allowed substandard conditions to exist previously--but it must be done and USDA will do it.

"Many of the premises which are substandard were licensed in early 1972 when we had a tremendous volume and backlog of dealer applications. By law, the applicants were operating in violation. Also, USDA, by law, was required to license applications that met the requirements. We had to organize task forces with insufficiently trained personnel to make the pre-licensing inspections. The result was having substandard premises licensed as USDA dealers.

"We are making every attempt to correct this situation this fiscal year by conducting week long training courses for our field personnel. By July, 1976, we will have trained approximately 600 employees at 9 such courses (10 if money is available) held this fiscal year. We are emphasizing to our employees that we must admit that we were wrong in the past by not being more strict in inspecting the substandard dealer operations but we must now bring about the needed corrections.

Humane Information Services will send a receipt for dues or a contribution in the amount of \$5.00 or more, or in a lesser amount if the sender so requests, or if same is received in cash, by money order or from a foreign country. Otherwise your cancelled check will serve as a receipt. All dues and contributions are tax deductible.

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## PUPPY MILLS — FROM PAGE 2 —

"We have found that current regulations and standards do not always reflect minimum requirements in the commercial pet producer and supplier industry. We are preparing to have a large scale revision of our present requirements. To do this, we need suggestions and input not only from USDA employees and USDA licensees and registrants, but from all segments of the industry. We would certainly consider any suggestions that participants at this workshop would wish to make."

Well, Humane Information Services submits one suggestion here. It would seem that one reason for the bad conditions found on the premises of small puppy mills is that there are too many of these to warrant attention from the limited APHIS staff, or because they are considered to be exempt because of their size. One section of the original Act of 1966 which apparently remains after all of the subsequent amendments excludes any person "who derives less than a substantial portion of his income (as determined by the Secretary) from the breeding and raising of dogs and cats on his own premises and sells any such dog or cat to a dealer..." This may be interpreted to exclude some of the numerous small puppy mills whose total output makes up a significant part of the bunchers' volume. We grant that it would be very difficult for the APHIS to license and inspect all such puppy mills, in any event. Yet, we cannot successfully deal with the overall problem without taking some positive steps to eliminate the bad conditions of these small puppy mills.

This dilemma might be resolved by requiring the bunchers, all of whom are or should be licensed, to buy only from persons who maintain prescribed sanitary and other conditions for the animals. If any humane society, kennel club or other concerned person encountered deplorable conditions in a small puppy mill, they could report it to the nearest representative of the APHIS, who after verification could notify the buncher that this particular puppy mill did not meet the purchasing requirements. Such instances would be much less numerous if the bunchers knew that their own licenses were at stake.

Thus, it would be possible, according to our interpretation of the Act, for the USDA to exercise effective control even over small puppy mills which technically may not come directly under the licensing provisions of the Act, by placing responsibility on the bunchers for buying puppies only from puppy mills meeting minimum requirements. This, in effect, would greatly augment the field force of inspectors without substantially adding to the APHIS budget.

## CRITICISM OF ENFORCEMENT

As noted by Dr. Schwindaman, the APHIS has not been given the funds or personnel required to deal with all of the puppy mills which really need looking into. And much of the funds for travel and other expenses, and the time of personnel, must be devoted to a whole lot of red tape, hearings and official reports which are a part of any bureaucracy. If the total budget of the agency charged with administering any law is sufficient only to handle these fummiddles, nothing is left with which to conduct the really productive work of inspection, threatening and persuasion which constitute the most effective means of enforcing the law. That seems to have been the case in this instance. The APHIS has been so occupied with complying with the technicalities of the law that it has not had the time to try to carry out the intent of the Act. The actions taken have been, in our judgment, the superficial motions which permit the APHIS to establish a record of token enforcement, not genuine effort to remedy the conditions which the Act was intended to rectify.

Another reason for this failure is the tendency to use the APHIS staff, presumably devoted to enforcement of the Act, for other duties for which, under the USDA's administrative organization, the same staff is responsible. Thus, if a complaint about some dog dealer is received in Washington and forwarded to a field

been diverted to handling some animal health problem which is considered to be of an emergency nature, and probably is of much more interest to the staff veterinarian than chasing around the area inspecting puppy mills or bunchers. We would much prefer that the Animal Care Section under Dr. Schwindaman be made an independent arm of the Department, responsible only for enforcement of the Animal Welfare Act, the Horse Protection Act, and any other legislation relating mainly to animal welfare. There is no point in trying to effect such a change under the present Secretary of Agriculture, who seems to have little or no sympathy for humane objectives, but it is an important future objective.

The results of this combination of conditions show up in what appear to be glaring cases of failure to apply already promulgated standards of housing and care to inspected licensed breeders and dealers.

Local humane societies and kennel clubs seem to have been asleep at the switch so far as unearthing such cases is concerned. The best work of this kind that we have run across is by Ann Gonnerman, a Missouri humanitarian who recently has been given financial assistance in her work by appointment as a field agent of the Humane Society of the United States. That Society has graciously furnished us with several of her reports on inspections of the premises of puppy mills which already had been licensed, and in some cases recently inspected, by the APHIS of the USDA. Here is one of them:

"This 'kennel' consisted of chicken wire pens with several breeds--Dobermans, beagles, keeshonds, hounds, Pekinese, etc. It was drizzling when we arrived. The pens were muddy and had large holes in them. The manure was from many days. Housing of the animals consisted of overturned trash barrels, wooden lean-to half open small sheds....What appeared to be skulls of animals were lying about all of the pens....There was no food in any of the pens. The water in the pens was rain water. All of the containers were filthy....The females were all in over-bred condition, with teats hanging way down....One section was composed of runs set up off the ground. All these animals were on wire. One large run was badly overcrowded. Some were crowded into small pens.... This is a USDA-inspected kennel."

About another defective USDA-licensed kennel Ms. Gonnerman reported: "The USDA inspector, we were told, was there today to inspect the kennel. She told Jeff Miller that she had never had any trouble with the USDA inspector."

The dog dealer provisions of the Animal Welfare Act are not the only ones that seem not to have been effectively enforced. Don't just take our word for it. At hearings before the Subcommittee on Livestock and Grains of the House Committee on Agriculture, held September 9-10, 1975, Captain Donald Lambert, of the Massachusetts Society for the Prevention of Cruelty to Animals, said: "The USDA's record in enforcing the Animal Welfare Act has been far less than satisfactory. Adding still another responsibility (the transportation of pet animals and animal fighting) will only complicate the problem." Humane Information Services hopes, with fingers crossed, that this forecast will prove to be unfounded.

Mrs. Christine Stevens, president of the Animal Welfare Institute and secretary of the Society for Animal Protective Legislation, in a prepared statement to the Subcommittee during the same hearings, said:

"My statement this morning will be limited to discussion of matters...that need to be dealt with to make the Animal Welfare Act achieve the purposes for which it was designed by its author and the Congress which overwhelmingly enacted it."

(Mrs. Stevens then went on to detail fail-



How could anyone cause suffering by such cute little animals? But the puppy trade can and does, by the thousands each year. This article tells what can be done to end this suffering. (Photograph by George Kurteson, of 1230 Elm Street, Lebanon, Pennsylvania, who gifted us with this and several other photographs.)

relating to various aspects of laboratory animal regulation. Following are a few excerpts from her statement, not necessarily in the order in which they appeared.)

"Regulations under the Animal Welfare Act need to be strengthened but even the modest minimum standards which do exist are often violated with impunity because of the roundabout methods which must be followed to bring action...."

"For the use of the Subcommittee I would submit a pamphlet issued by the SAPL shortly before passage of (the) Act. It shows a dog room in the University of Minnesota....This pamphlet...was viewed with horror by the average citizen. An unprecedented flood of letters reached the Congress from people who expected the Act, if passed, to prevent such horrors in the future. The tragic fact is that this same perpetual caging is still going on a full nine years later!"

"Is it surprising that the public's confidence in government has fallen to an all-time low? This Subcommittee has the authority and the power to obtain action consonant with the law...."

We could go on and on about inadequate enforcement of the Animal Welfare Act, but it would appear that what has been said above, and about conditions for puppy mills and animal dealers in our Report to Humanitarians No. 36, shows clearly that such "enforcement" has been largely a matter of fulfilling the strict legal requirements relating to form, and not to the substance and real intent of the Act and of the Congress that passed it.

No other humane society that we know of has come out with such a comprehensive and blunt public indictment as this (WARDS has denounced the USDA, but less specifically and comprehensively). Frankly, we hesitated for some time before doing so. We know and like personally the USDA staff members who have responsibility for administering the Act. They are well-intentioned and capable people. We sympathize with them about the obstacles encountered, as given by Dr. Schwindaman in the address previously quoted. We wrote to Dr. Schwindaman on June 28, asking for information about enforcement of the puppy mill and dog dealer provisions of the Act. When no reply was received by August 10, the day we began writing this section of this article, we called Dr. Schwindaman long distance. He was out of town, so we asked for the next in command, who was on the phone with another party. His secretary promised that he would call back as soon as his call had been completed, but we have heard nothing from him since. We sent a copy of this article to the APHIS with an invitation to frankly comment and correct any possible errors of fact. No reply has been received as we go to press. So we have given the APHIS of the USDA ample opportunity to present its case in rebuttal to what has been said here.

## PUPPY MILLS — FROM PAGE 3 —

three principal reasons for this failure to enforce the Act:

(1) *The bureaucratic administrative labyrinth and procedures which must govern all actions taken, to which we have previously referred.*

(2) *Some of the provisions of the Act, as indicated by experience with them, need changing or additional authorizations.* Although this is desirable, it would require going down a long legislative road for realization. We believe that much more could be done under the existing Act, and perhaps that should be tried first.

(3) *Inadequate funding of the enforcement machinery has been a principal reason for the failure.* Dr. Mulhern, a top official of the USDA who attended the Subcommittee hearings at which these matters were discussed, stated: "I think one of the reasons for the criticism has been that we just do not have enough money to cover the present scope of the Act." Humane Information Services does not just think so, we know so!

In fairness to the Office of Budget, the Congress and the USDA, none of which has urgently sought to rectify this deficiency, it must be admitted that humane societies also are to blame, perhaps more than anyone. There is a strong tendency among them, and their members, to demand legislation to take care of a multitude of problems without giving a thought to problems of enforcement, particularly the amount of money required to do the job. We must be just as diligent in seeing that adequate means to enforce legislation already passed are provided, as in trying to get new legislation on the statute books. In this particular case, some humane and perhaps most antivivisection societies have even strongly opposed additional funding for enforcement of the Animal Welfare Act, on the grounds that such additional money would be used in some mysterious way to provide more animals for research and to further entrench the animal laboratory interests!

We understand that at least one society has advocated repeal of the entire Animal Welfare Act, for reasons similar to those given for opposition to increased funding. To Humane Information Services, this is a suicide wish! The present law has been obtained only by the prodigious efforts of many humanitarians and humane societies. It would be extreme folly to throw all this away and attempt to start anew. The present Act can be made into a highly useful tool in dealing with a multitude of animal welfare problems. We should concentrate on modifying it as experience shows the need, and on obtaining more effective enforcement of the existing provisions of the Act.

Since needed amendments to the Act and larger appropriations for its enforcement are both legislative matters, we will reserve specific recommendations on these aspects of the problem, and turn them over to our sister society, the National Association for Humane Legislation (NAHL), which is not tax exempt. No fruitful legislative activity for animals is likely to come up until early in 1977, at which time we expect NAHL to issue another *Humane Legislation Digest*.

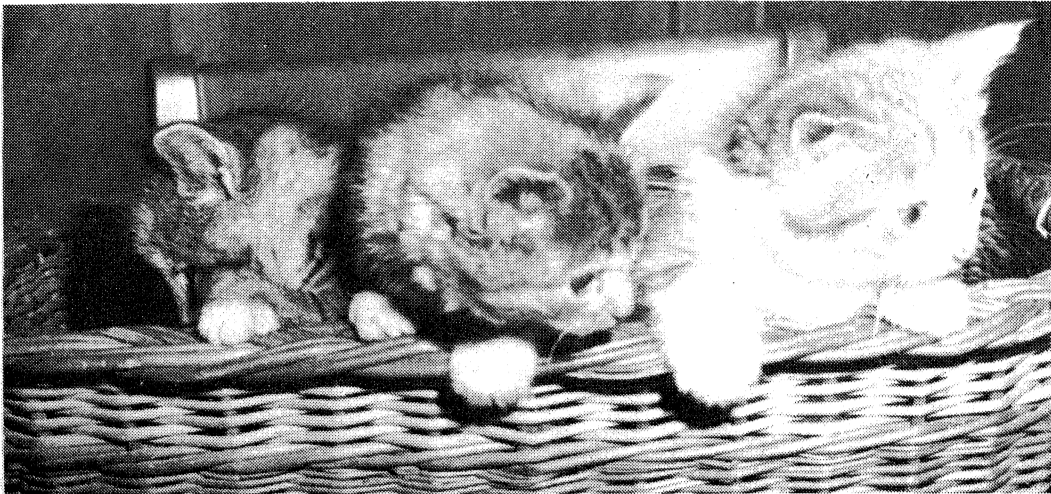
## STATE LEGISLATION

Proper enforcement of the existing federal Animal Welfare Act can do much to improve conditions in the puppy mills, and to reduce the commercial trade in puppies. But it cannot do everything that is needed. For example, it does not encompass the pet shops which are an important link in the commercial chain.

Some have suggested that state legislation is the best means of dealing with the problem. This is a principal feature of the proposals of the Humane Society of the United States (HSUS) in its "Special Report on Abuses in the Pet Industry" (February, 1974). It proposes a state statute that "will govern the operations of breeders, wholesalers and pet shops."

The HSUS proposed state law is very well drawn, but space limitations preclude its inclusion in this article. It is intended to do for a state what the federal Animal Welfare Act is intended to do na-

Will kitten mills be next? So far, cats have largely escaped the attention of the puppy mill-dealer trade, but eventual attention to "purebred" felines seems inevitable.



(This is another photograph by George Kurteson, who takes wonderful animal pictures. We obtained this through Mrs. John H. Cassel, of Lebanon, Pennsylvania, a member who is on the alert to help us help the animals--see request in "box" on page 6.)

are concerned, and in addition includes pet shops.

There are four objections to this approach:

(1) *It would be a long, tedious and in the end an almost impossible task to obtain passage of such state laws in a sufficient number of states to deal effectively with the puppy mill problem, which is national in scope.* If it was passed and enforced in only a few states, the puppy mills could just move to other states. After several decades of effort, the campaigns to obtain humane slaughter laws have been successful in only about half the states. In the case of the proposed breeder-dealer-pet shop law, in the very same mid-Western states where the puppy mills flourish and the law is most needed, humane societies are the weakest and the chances of action by the legislatures are slimmest. Some state universities and agricultural extension services help to promote puppy mills as an additional source of income to farmers.

(2) *Enforcement problems would be similar to those encountered in connection with the federal Act.*

(3) *Dealers and breeders already subject to the federal law would object, perhaps legitimately, to duplicating state and federal licensing and enforcement.*

(4) *A straightforward state law such as that proposed by the HSUS would cover only the humane treatment aspects of the problem, and would contribute little to reducing the commercial puppy trade's contribution to the pet animal surplus.*

## THE ILLINOIS LAW

A different type of approach to state regulation of the commercial pet trade is by making it a part of general state pet animal control laws.

According to Guy R. Hodge, director of research and data services for the HSUS, "At least 15 states have enacted statutes pertaining to the licensing and inspection of pet shops and kennels. The most comprehensive of these measures are statutes enacted by Illinois in 1973 and by Iowa in 1974. The measures are similar in text and provide for the regulation of animal shelters, pounds, pet shops, commercial kennels, hobby kennels and boarding kennels. In addition to requiring a license fee for such establishments, the law provides standards of care for animals and provides for the periodic inspection of premises where animals are housed.

"In 1973 Illinois enacted a measure termed the 'Animal Control Act.' As with most other state licensing and restraint measures, this act required county governments to implement animal control programs.... It assigns to the Illinois Department of Agriculture supervisory authority relating to the administration of the provisions of the act and it empowers the Department to enact rules and regulations relating to animal control."

The Illinois law, although one of the few which even pretends to regulate the commercial trade in puppies and dogs, is largely concerned with stray dogs, rabies inoculations and impoundment.

"One glaring weakness in the present Act is the fact that only those who sell, offer to sell, or offer for adoption, with or without charge, dogs and cats other than those produced under their ownership are required to obtain a license and undergo inspection and regulation by our

tion Services dated March 27, 1973, from Dr. David R. Bromwell, staff veterinarian of the Division of Meat, Poultry and Livestock Inspection of the Illinois Department of Agriculture, which has responsibility for enforcement of the Act).

Apparently the underlined words exclude the ordinary puppy mill which is the source of a good part of the bad conditions encountered.

Fortunately, Dr. Bromwell has proved to be a conscientious and vigorous administrator, but is greatly handicapped by the wording of the Act, which gives the impression that it, together with the implementing regulations, have been written by veterinarians rather than humanitarians or others familiar with animal control problems.

At the time the letter quoted was written there were 548 licensees in the State. According to Dr. Bromwell, "With the limitation as mentioned before, as to who is required to obtain a license, it is easy to see and calculate that literally hundreds, possibly several thousand, are not covered or regulated in any way by our existing Act."

And, with what coverage it does have, the Illinois Act does not even attempt to deal with the problem of the surplus production of puppies.

If any area of legislation needs a completely new, fresh start, it is all phases of state regulation of pet animal activities. Our sister society, the National Association for Humane Legislation, will try to deal comprehensively with this single subject in a future *Humane Legislation Digest*.

## STATE DOG ACQUISITION FEE

A third, and one of the most interesting and novel state approaches to the problem is that advanced by Eileen McShane, Madison County, New York, dog warden, at a workshop on pet population sponsored by the New York State Humane Association in 1975 and reported in a well-written article by Ms. McShane in the *American Humane Association's Shoptalk* for July, 1976.

With respect to pet population control she says: "The principal battle cry has been 'education.' I think I can say without fear of successful contradiction that this approach has failed. The population of pets has continued to increase to the point where estimates of their numbers differ by the tens of millions. The time has come where we have to recognize that we must do something which will be effective and perhaps this something lies in the 'acquisition of a pet.'

"At the present time, the acquisition of a pet--be it a dog or cat--is shamefully easy....

"We could begin by establishing a license for the acquisition of a pet. This license, which should be imposed by the state, should be significant enough to make the prospective acquirer think very seriously about whether he really wants this pet, be it a dog or a cat. A good starting point would be \$50. Common sense tells us that such an approach will be far more meaningful than the extraction of promises of a loving home and perpetual care.

"In addition, there should be an annual license fee of sufficient magnitude to let the owner know that what he has represents an object of considerable value.



**PUPPY MILLS—FROM PAGE 4**

For example, in a number of European cities this fee is in excess of \$50 a year. By this very simple expedient, these cities have solved not only their animal control problems, but the attendant problem of over-population."

Although Ms. McShane's proposal was not designed specifically to deal with the puppy mill-dealer-pet shop commercial trade in dogs, it could serve as a very real deterrent to the conditions described in our previous article on puppy mills. A high acquisition fee would serve to discourage impulse buying of puppies in pet shops, which obtain the bulk of their stock from puppy mills. It would also discourage people from accepting puppies and kittens from irresponsible owners, who would think twice about letting their animals breed if they knew they were not able to get rid of the resulting progeny by canvassing the neighbors or putting an ad in the papers. Of course, it could also discourage adoptions from shelters and pounds.

All of this would infuriate the "save-a-lifers," whose sole concern is preventing the death of an already-existing animal rather than preventing the birth and later inevitable death of many more animals.

This disadvantage of the proposal could be largely eliminated by making the acquisition fee only a small sum for neutered animals, and a very high amount for unneutered. This would encourage adoptions from shelters and pounds having sterilization requirements, and discourage purchases of unsterilized "purebreds" obtained by pet shops from the puppy mills.

At first blush it might appear that the enforcement of such a state acquisition fee would be attended by insurmountable obstacles. Would it require an army of state agents swarming over the communities? But such obstacles could be avoided by placing enforcement in the hands of county or municipal pet animal control authorities or humane society shelters. All fees collected after paying the minimal expenses of setting up a state supervisory agency would be diverted to the local control agencies, giving the latter a great incentive to collect the fees and enforce the law.

Altogether, this proposal seems to have sufficient merit to warrant further careful consideration by all those interested in both pet population control and reform of the puppy mill-dealer-pet shop complex.

**COUNTY AND MUNICIPAL LAWS**

County and municipal animal control ordinances of the type which provides for the licensing and regulation of pet shops and commercial kennels can help to some extent in alleviating conditions in the commercial pet trade. But at best this approach to the puppy mill-dealer-pet shop problem has a very limited potential. The most serious obstacle is that such ordinances would be most difficult to obtain in the very places where they are most needed.

**WHAT LOCAL HUMANE SOCIETIES CAN DO**

Local humane societies operating pet animal shelters or "adoption centers" could help to decrease the demand for the product of puppy mills by following an entirely different adoption policy. At present the emphasis is on "save a life" by adopting one of the poor dogs of unknown ancestry which have been received at the shelter. The emphasis is placed on cheap acquisition and humane motives for adoption. But the flourishing trade enjoyed by the puppy mills, bunchers and pet shops demonstrates that increasing numbers of increasingly affluent people are looking for neither cheapness nor an opportunity to do a good deed. They want a puppy which will give them "dog status" when it grows up, and which is healthy and of good temperament. The animal adopted from the humane society shelter is not expected to fulfill either of these desires. Even less likely is the puppy obtained from the pet shop, but the potential new owners do not know this.

exists, educate the potential buyers about the pitfalls of puppy-mill products found in the pet shops, and emphasize the desirability of acquiring a healthy, mature dog rather than a puppy of dubious health and ancestry. Such a merchandising policy would bring in much more money from "adoptions," and contribute greatly to a reduction in the puppy mill trade and the later reproduction of unfit and unneeded progeny from unfit "purebreds" with "papers."

Humane Information Services considers this to be such a potentially important step that it will later carry an article in *Report to Humanitarians* covering in detail the principal components of such a modern merchandising policy. "Doc" has served as a merchandising consultant to some of the largest corporations in the country that market products under trade names familiar to every consumer, and to leading advertising media. He is confident that the principles of merchandising taught in every university school of business administration can be applied to the dog adoption business as to any other merchandising problem.

Humane societies also can be of great help in dealing with the commercial trade in puppies by taking the initiative and participating aggressively in the activities listed below for kennel clubs and individual humanitarians.

**BREEDERS AND KENNEL CLUBS  
A POSSIBLE KEY TO  
EFFECTIVE NON-GOVERNMENTAL ACTION**

The tendency among animal lovers to rely upon government action to remedy conditions adverse to animal welfare is nowhere more evident than in connection with the commercial trade in pet animals. It would be possible for humane societies and organizations of dog breeders virtually to put an end to the bad conditions described in our previous article without any help from the government, federal or state. The

means are at hand. All that is lacking is the will to act.

The commercial trade in puppies, including the puppy mills, dealers and pet shops, is dependent almost entirely upon the claim that it produces, assembles and sells "purebreds" registered or registrable with the American Kennel Club (AKC). Without the "papers" that go along with the puppies, the naive impulse buyers of those dogs from the pet shops would be unwilling to pay the comparatively high prices which must be charged to support the elaborate machinery of the commercial puppy trade, and yield the good profits to all including the pet shops. The whole machine would collapse like a house of cards.

The AKC is a corporation that maintains a registry of purebred dogs, promulgates rules and regulations that govern kennel clubs, shows, field trials and obedience trials, and establishes standards of the breed for all recognized breeds.

Kennel clubs may be members for a fee, but not all clubs belong. Those who do may send delegates to AKC meetings. But we are uncertain regarding the legal and effective control over the AKC, which we suspect is run by a close-knit board of directors, with the local clubs having little if any control.

The kennel clubs and breeders' organizations have far more collective political clout than do humane societies, because of their numbers and large memberships. These clubs, in turn, are composed of and in theory controlled by individual breeders who are either commercial kennels or hobby breeders. As was clearly shown in our previous report, these are hurt, not helped, by the puppy mill-dealer-pet shop complex. Their market for puppies legitimately and humanely bred, raised and disposed of to individual buyers would be greatly enhanced by elimination of the

(See PUPPY MILLS, page 6, column 1)



This starving dog was adopted by a Milwaukee family, and turned into a fine pet. Many people will adopt dogs from shelters because of humane considerations, but the thousands of affluent patrons of pet shops can be more easily sold by the kind of merchandising used by the commercial pet trade. The adoption programs of humane society shelters should be related more to the needs of

## PUPPY MILLS — FROM PAGE 5

puppy mills and pet shops.

This could be accomplished by concerted action on the part of local breeders and their local organizations which are adversely affected by existing conditions. They could bring pressure to bear on the AKC to change its registration procedures in one or more of several ways:

(1) Register a dog only after it attains one year of age and on submission by the owner of a certificate signed by a local veterinarian that a properly identified (tattooed) animal had been examined and found to be free of inherited abnormalities and disease. This suggestion has been made by Mrs. Roberta Bickerstaff, who stated in an article in the Thousand Oaks, California, News-Chronicle:

"AKC, the national registry for purebred dogs, accepts registrations without certification of identity, ancestry, or health. When requested, it makes minimal investigations of unethical practices. In general, however, AKC disregards ethics, record keeping, and husbandry of dog breeders. As a consequence, dogs with genetically determined abnormalities are registered, bred, and reproduce another generation of abnormal dogs.

"In 1973, an article in the March issue, 'Purebred Dogs,' AKC's official publication, admitted that AKC maintained records on 7,000 commercial kennels. The American Dog Owners Association (ADOA) estimates these puppy mills were responsible for producing an excess of one million puppies during 1972-73<sup>2</sup>). The puppies

2) Apparently this does not include any of the progeny of these puppies when they reach maturity and are bred by naive owners who view themselves as "breeders." The estimate by Humane Information Services in Report No. 36 of "something approaching two million" does take these resulting progeny into account.

were characterized by sickness, falsified papers, or suffered from inherited defects. Unfortunately, many genetic defects do not become apparent until the dog is one year of age or older. The unsuspecting buyer, therefore, buys and registers a puppy in good faith. It isn't until the dog is mature that the ugly truth is known. By the time the dog is too crippled to walk, too blind to see, or suffers from a neurological disorder common to dogs, it is too late to demand recourse from the breeder. None was available from AKC in the first place.

"The compassionate owner of these crippled dogs will spend a small fortune maintaining their beloved pet in comfort. The uncompassionate and disgruntled, however, usually abandon the dog. It then becomes a public liability, or a ward of the Humane Society. The latter places the fertile animal in a home where, in many instances, the dog hybridizes with the neighbor's dog, and the subsequent offspring become the hybrids (mongrels) that crowd the public pounds. Either that, or the new owner is able to obtain registration papers from a pet store or puppy mill that will match the sex and breed of dog he has. He is then able to register the animal with impunity because AKC does not require dogs to be tattooed for identification purposes. Needless to say, the dog with false papers can reproduce as easily as the purebred with an impeccable background. Of what value, then, is AKC's registry procedures?

"Registration fees, however, support AKC activities. A system of registration that would necessitate dogs being properly identified (tattooed) and certified by a licensed veterinarian to be free of inherited abnormalities at one year of age, would force puppy mills out of business. The number of dogs registered would decrease and AKC's budget would have to be trimmed. A reduced income would jeopardize the privileges, power, and plush salaries now enjoyed by AKC officials."

Mrs. Bickerstaff goes on, in the article, to give the arguments used by defenders of the present registration procedures, which she rebuts and to which she gives a final salute: "Hogwash!"

and progeny on hand of all breeders offering litters or individual animals for registration. Obviously, this would be an impossibly costly operation for the AKC alone. It would have to refer all new requests for registration to a nearby legitimate kennel club, which could assign a committee of breeder-members to make the inspection and report back to the AKC that the applicant was qualified or not, as the case might be. To be qualified, the applicant would have to follow acceptable breeding practices and maintain sanitary and humane conditions for the breeding animals and puppies. This would involve considerable work for the local kennel clubs, but the results would be worth the effort, from an economic as well as conscientious breeder's standpoint.

(3) The fees for registering dogs with the AKC could be greatly increased. This would result in reducing the volume of business received from the puppy mills, pet shops and customers. The smaller (and generally the more flagrant violators of good breeding and husbandry practices) puppy mills would mostly go out of business. The legitimate breeders also would have to pay the higher fees, but in our opinion the results would so improve the market for legitimately bred, raised and sold purebred dogs as to bring increased net returns for legitimate breeders. And the reduction in volume of registrations by the AKC would be partly or more than offset by the higher fees received. Cadillac dealers make as much money as Honda dealers!

Dr. and Mrs. Merlin Rogers, of Bangor, Maine, retired breeders who are very much interested in the solution of these problems, at the suggestion of Humane Information Services contacted a considerable number of breeders and officers of local kennel clubs to obtain their reaction to this proposal. All opposed any increase in registration fees. They probably also would oppose the preceding two approaches to the problem. This is to be expected. It would require an organized educational campaign conducted by the more farsighted and humane-minded clubs, in association with local humane societies, with guidance and help from several national humane societies, to obtain a positive response. But this takes work, and the expenditure of humane resources which can be more profitably spent on publicity designed to obtain new members and more contributions. The battle cry is "Let George (or the government) do it." As stated by Dr. David R. Bromwell at the second national conference on dog and cat control sponsored by the AHA, HSUS, AKC, American Veterinary Medical Association (AVMA) and Pet Food Institute: "It is always their neighbor's or the other person's fault that we are in our present situation, while considering that our own activity is above reproach. ...We are still maintaining the same image of the past, much talk, lots of print, little action, and in short, satisfactory animal control is still the same smashing failure that it has been."

#### WHAT THE INDIVIDUAL HUMANITARIAN CAN DO

(1) Try to persuade your local humane society and local kennel club officers,

directors and leading members to read our Report to Humanitarians Nos. 36 and 37, and then call a joint meeting to discuss the alternatives and what, if anything, they propose to do about the situation.

(2) Write as an individual, and persuade your local humane society, kennel clubs and church and civic organizations to write letters or send resolutions as follows:

(a) To Dr. Dale F. Schwindaman, senior staff veterinarian, Animal Care Staff, USDA/APHIS, Federal Center Building, Hyattsville, Maryland 20782, urgently requesting him to increase the minimum age of puppies shipped to at least ten weeks, and to make health certification of puppies before shipping as stringent and specific as possible.

(b) To your own Congressman, and the two Senators from your state, requesting them to urge the USDA/APHIS to take such action. You might also suggest that their legislative assistants obtain from Humane Information Services copies of Report to Humanitarians Nos. 36 and 37, and read them as guidance in dealing with this important problem. And urge them to do what they can to provide sufficient appropriations for adequate enforcement of the Animal Welfare Act by the USDA/APHIS.

(c) If you are a breeder, write to your local kennel clubs and the American Kennel Club, 51 Madison Avenue, New York, New York 10010, asking them to seriously consider the alternative actions suggested in the preceding section of this article.

(d) If you are familiar with essential details of any local cases of apparent violations of the Animal Welfare Act by puppy mills or dog dealers, write to Dr. Schwindaman at the address given in (a) above, advising him of these facts and suggesting that his staff look into them. Send a copy of your letter to Humane Information Services.

(e) To Humane Information Services for needed copies of these two reports, which are free up to ten copies each (ten cents per copy for additional quantities to help pay for postage and handling). We suggest that distributing these to mildly interested persons will be a waste of money and effort. But put them in the hands of breeders, kennel club and humane society officials or directors whom you have contacted by telephone or in person, if they agree to read them. It does no good to give such materials to people who are antagonistic or indifferent. They will not read or be convinced. You have to start with someone who is sympathetic and really interested in helping these poor puppies.

(3) If you are too busy or for some other reason unable to help by doing any of those things, send an extra contribution to Humane Information Services, 4495 Ninth Avenue North, St. Petersburg, Florida 33713, to help pay the expenses of this campaign. What better use could you make of this money? Believe us, it will not be wasted, or frittered away on unproductive, publicity-seeking activities. We depend upon our members to provide the means for conducting our down-to-earth, practical, productive programs for the alleviation of animal suffering. All contributions are tax deductible.

#### PLEASE HELP!

This is not another appeal for contributions! Our readers already know how badly we need more funds in order to employ a much-needed field investigator and for other purposes. Compliments (see Letters to the Editor) are much appreciated, but we can't pay expenses with them!

This is an appeal for help that will not cost you anything! Many members send us newspaper clippings, magazine articles, photographs, copies of state laws and local ordinances, humane publications that we may not be receiving, and other materials. Sooner or later practically all of this is used in some way or other. To acknowledge receipt of these materials would impose an impossible burden of correspondence on our very limited staff, but we want all these fine helpers to know that their efforts are greatly appreciated.

And we wish that many more would do the same. We especially need copies of state and local laws affecting animal welfare, and local humane society publications which give details about society policies and practices as re adoptions of unneutered pets. Good, clear photographs of animals are always very welcome, especially if they have a description written on the back (who, what, where, when) along with your name and address.

And just a long letter describing conditions at your local pound or shelter, etc., can be very useful. Don't worry about the wording of your letter, but be sure to give all the known facts. For example, don't just say "injections of sodium pentobarbital" but "intravenous (or intracardiac, etc.) injections of sodium



# Pitfalls and How to Avoid Them

## IN LEAVING BEQUESTS TO HUMANE SOCIETIES

Several years ago one of our members in a mid-Western state wished to leave a substantial sum to Humane Information Services. She had previously executed a will, of which her son was the beneficiary, but since then he had shown little interest in caring for her during a long siege of painful illness, during which she was helped greatly by several neighbors and friends. The son also was quite unsympathetic with the lady's great interest in animal welfare, and in her dog, with which she had an almost spiritual relationship. So, she decided to leave substantial sums to several of the helpful friends and neighbors, and a respectable bequest to Humane Information Services. But instead of executing a new will, which she thought might be contested by her son, she set up a number of accounts with local savings and loan associations, with a different sole beneficiary named in each account. She also thought that this means of disposing of the bulk of her liquid assets would avoid some of the expenses and inconveniences of probate.

When the lady eventually died a painful death, unattended by her son, the will was offered for probate. Unfortunately, the will had been executed years before and had named her son as chief beneficiary, although in later years they had become very distant and even hostile. The son, standing to inherit the entire estate, was unhappy in the fact that the bulk of her estate was in these joint accounts with the humane society and others. He filed suit to declare the accounts void on the ground that they were, in effect, testamentary dispositions. He took the view that the accounts had been established informally and not with the formal requirements of executing a will, and hence were null and void and should become assets of the estate rather than passing to the named beneficiaries. In addition, he also claimed that his mother was incompetent at the time the accounts were set up. But the major thrust was the former argument that they were void attempted testamentary transfers. Attorneys then were employed by all concerned parties, the beneficiaries claiming they were not void testamentary transfers and the son claiming that they were.

After countless depositions and hearings, an offer of settlement was made by the attorney for the beneficiaries of the savings accounts, and accepted by the attorney for the son. When the whole thing was over, the beneficiaries received about half what they were supposed to get. The attorneys' fees were a substantial part of the total sum, but they earned what they got because of all the time consumed. If settlement had not been made, apparently little would have been left for anybody!

All of this delay, expense and aggravation possibly could have been avoided if the lady had simply set up the savings and loan accounts in her name, "as trustee for" the beneficiaries. If that had been done, the savings and loan association would have transferred each account to the person for whom it was held in trust, or mailed checks to the parties.

This is only one of many instances we have encountered in which the wishes of the person making a bequest to a humane society have been thwarted because the proper action was not taken. Even when a lawyer draws up a will, things may not turn out as expected. Quite a few people have become interested in animal welfare after they became elderly, when the kids had flown the coop and the old folks became much attached to a dog or cat, or both, who gave them emotional support and drew their attention to the need for helping animals. Sometimes, even such attitudes toward animals can be erroneously construed as evidence of mental aberrations and incompetence to execute a valid will. Many probate judges who have little love for animals may tend to lean over backwards in favor of relatives contesting a will which bequeaths a substantial sum

not mean what it says to a judge with different ideas, if there are blood relatives to contest it.

### THE EASIEST WAY TO MAKE SURE THE FULL AMOUNT WILL GO TO THE SOCIETY, BUT WITH YOU RETAINING FULL CONTROL OF THE MONEY UNTIL YOU DIE

While it is conceivable that an individual might contest a savings account or certificate of deposit account set up in trust form as being a void attempted testamentary transfer, nevertheless most courts throughout the United States have upheld the complete validity of these "Totten" trusts. It is therefore believed that the best and surest way to leave a substantial bequest to a humane society is to set up a savings and loan passbook account or certificate of deposit in trust form rather than in joint form.

Accounts set up in this way belong to the party who owns them as long as he or she lives. This party receives the income from the account, and can add to or withdraw from the account as desired, or cancel the account entirely. But on the party's death the balance in the account goes to the society named, with no probate proceedings or other formalities. And the society gets the full amount in the account, on the death of the party, regardless of the provisions of any will. It is not even necessary that the society be notified that it will be the beneficiary of such a trust account, if the benefactor wants to keep it a secret because of a possible future change of mind. However, it may expedite transfer of the funds following death if the society is notified when the trust account is set up, and arrangements are made for someone to notify the society when death occurs.

The laws of different states relating to such matters vary to some extent. We believe that the kind of trust account described in this article would serve the purpose indicated, regardless of where the savings and loan association or bank is located. You can make sure of this by consulting an officer of the local institution with which you are familiar. However, we know this is true of banks and savings and loan associations located in Florida. For that reason, anyone wishing to leave something to Humane Information Services may wish to open the trust account with a Florida savings and loan association. Anyone interested in doing so may write to this society, which will give you the names and addresses of several federally-insured savings and loans in Florida, and information regarding interest rates currently paid on passbook accounts and certificates of deposit.

For those who may not wish this society to know that you contemplate such a trust account, we give at the end of this article the names and addresses of several banks and savings and loan associations located in the St. Petersburg area. You can write directly to them for information about passbook accounts or certificates of deposit. In giving this partial list, we imply no superiority of these institutions over others. All are insured up to \$40,000 by a federal government agency. The savings institution you select will not divulge your action to us.

Or, if you don't want to bother with such details, you may wish to send us a letter stating what you want us to do, enclosing a check for the amount, and we will open the account for you and send you the passbook or certificate of deposit, whichever you choose.

Or, if you already have the money on deposit in a bank savings account or savings and loan passbook account, you can just send us your passbook together with a withdrawal slip signed by you for the amount in your account, and we will have the transfer made for you, and send you your new passbook or certificate of deposit in the Florida savings and loan associ-

your present account than you wish to leave us, your existing passbook will be returned to you showing the balance remaining after the transfer.

If you now have a certificate of deposit which will be due shortly, and if you will sign and send it to us, we will set up the new certificate in Florida for whatever amount you wish, and return to you a check for the balance of the expiring certificate of deposit which you do not wish to leave to us, or which you may wish to place in an open account in one of your local banks or savings institutions, to have on hand to meet emergencies such as hospital bills.

If even this is confusing, just write us stating what you have now, where it is or in what invested, and saying how much you would like to put in a trust account for us. We will reply giving full directions.

In opening any savings account or certificate of deposit account, with you as owner in trust for Humane Information Services, it is desirable to spell out the full names and addresses as follows:

"Mr. (Mrs., Miss, Ms.) \_\_\_\_\_

, of \_\_\_\_\_

Street, \_\_\_\_\_,  
(ZIP), as trustee for Humane Information Services, Inc., 4495 Ninth Avenue North, St. Petersburg, Florida 33713."

### OTHER WAYS OF LEAVING A BEQUEST TO HUMANE INFORMATION SERVICES

Among other ways in which you can leave part or all of your estate to Humane Information Services are: (1) executing a new will, (2) executing a codicil to your existing will, (3) making this society the irrevocable beneficiary of a life insurance policy. The last method permits you to take a tax deduction for the annual premiums.

Each of these three methods will be comprehensively examined in future articles. We believe you will be interested in reading them, as well as the present article, even if you do not have in mind leaving a bequest to Humane Information Services. The information in this article, for example, might be quite useful to you if you desire to leave something to a son, daughter, or other relative, without having the bequest go through probate. We have seen so many instances in which the desires of a deviser have been thwarted by unforeseen legal snarls and probate expenses.

### SOME FLORIDA BANKS AND SAVINGS AND LOAN ASSOCIATIONS

Central Plaza Bank and Trust Company,  
34th Street and 3rd Avenue North, St.  
Petersburg, Florida 33733.  
Century First National Bank in St. Petersburg,  
4th Street and Central Avenue,  
St. Petersburg, Florida 33701.  
Clearwater Federal Savings and Loan Association,  
15 South Lincoln Avenue,  
Clearwater, Florida 33516.  
Florida Federal Savings and Loan Association,  
4th Street and Central Avenue,  
St. Petersburg, Florida 33701.  
Franklin Federal Savings and Loan Association,  
100 - 34th Street North, St. Petersburg,  
Florida 33733.  
Home Federal Savings and Loan Association,  
1901 Central Avenue, St. Petersburg,  
Florida 33713.

### HELP—FROM PAGE 6

pentobarbital." If you don't have all the facts, call your local shelter, pound, etc., and try to find out. You might be surprised to know how much we value such letters.

If you receive copies of annual reports of any societies, send them along, too. These sometimes are very helpful.

Please do not worry about whether this will be a waste of your time. It is a very essential part of humane work. We are looking forward to hearing from you.



## LETTERS TO THE EDITOR . . .

### DIFFERENCES OF OPINION

"We have been on your mailing list for about two years now as Pets & Pals, 3311-D Julliard Drive, Sacramento (of which I am the local chairman), and your newspaper is the most informative, stimulating publication we ever see. I am shocked when I read some of those derogatory 'letters to the editor.' Wish you wouldn't even publish them. For instance, if they can't take the time to read your newspaper, then they are not truly 'humanitarians,' because every word is important and well written."--Mrs. Connie Spencer, Sacramento, California.

### REPLY:

We are glad you were "shocked" at the derogatory comments on our reports carried in recent issues. Some others were, too. But we welcome differences of opinion. Keeps us from getting a swelled head from the far greater numbers of complimentary letters received. Sometimes we find the complaints are justified, and try to improve. For example, we are using a few photographs in this issue to break the monotony of solid pages of type. The pictures do not make our message any more clear, but they may serve to persuade more people to read the report. Anyway, we tried!

Just to relieve the monotony of complaints, we publish below a few of the comments from those who think we are on the right track. Many others have been just as complimentary, in equally well-chosen words. We can't publish all of them, so have selected some from different geographical areas, regardless of date received. Hope you enjoy reading them as much as we did!

### COMPLIMENTS

"Your paper comes to us the long way around through the county commissioners' office, so we are always the last animal welfare agency to get it, but we never fail to be impressed by your thoughtfulness and common sense. We can always tell when the latest copy gets to town, because the other animal people start calling us, all excited."--Ms. Mary Sriver, Education Coordinator, Multnomah County Animal Control, Troutdale, Oregon.

"Your reports are very informative. You don't waste money on pretty pictures, poetry and puzzles."--Mrs. Pauline Kinsolving, Memphis, Tennessee.

"I appreciate the logic and honesty in *Report to Humanitarians*. I contribute to between 12 and 15 national and local animal welfare organizations and am particularly interested in learning to evaluate their effectiveness."--Robert L. Oyler, Antioch, California.

"We believe *Report to Humanitarians* to be the best publication of its kind."--Mrs. Meliece Jordan, Columbia, South Carolina.

"You people are doing a terrific job. Don't know what we'd do without you--hope we never find out!"--Mrs. Carleton W. Nowell, Wakefield, Massachusetts.

"Best wishes to all of you for your amazing ability to produce comprehensive, hard-hitting and highly intelligent *Report to Humanitarians*. I always learn a great deal from them that I had not known before."--Miss Margaret A. Jackson, Philadelphia, Pennsylvania.

"Your information report is the best there is. I am preparing for a trip to Europe. Please let me have a few copies."--Dr. Hannelore Lehnhoff, Kings Park, New York.

"I highly appreciate your work; your publications circulate among my friends. The great amount of clear and sober information is of great help."--Mrs. M. R. Vrtilek, Fond du Lac, Wisconsin.

"The greatest honour one can have is to be given recognition by one's peers. To me you are one of the greatest, if not the greatest, humanitarian that I have met. You are undoubtedly the humanitarian who is taking the most sensible approach."--(From one who is so prominent in humane work, and has been identified with so many humane causes, that we withhold his name because it might embarrass him in dealing with other humane leaders.)

"I believe you are the only humane organization that really tries and does find solutions."--Mrs. Josef J. Leasure, Louisville, Kentucky.

"I hope you're interested in one dedicated person's struggle to find her way in this maze called 'animal welfare work'! You have certainly helped to put me on the right track!"--Mrs. E. Bancroft, Mississauga, Ontario, Canada.

"Just wanted to send a list of folks that I believe would be interested in your fine writing."--Miss Gretchen Wyler, New York, New York.

"I think your reports are really excellent--the most intelligent and informative material I receive."--Mrs. George Johanson, Portland, Oregon.

"I have just read your *Report to Humanitarians*. You are my kind of people, so please enroll me as a member. Your *Report* is the most sensible I have ever read. It is great!"--Mrs. George Kolikas, Medford, New Jersey.

"I want you to know how much we appreciate receiving your *Report*. As you know, we are on many 'humane' mailing lists. Most of the literature is consigned to the wastebasket. Not your *Report*. I read every word and pass it along to others. So few people have a realistic approach to the problems that confront all humane organizations."--Ms. Betty Blodgett, Corpus Christi, Texas.

"Your reports are just excellent and often put into words

zation with all the intelligent people I run into in the course of my work for animals (particularly cats) and try to influence them to join and read the bulletins. I know I have been successful with some of them. KEEP UP THE GOOD WORK--YOU MAKE A LOT OF SENSE!!!"--Miss Corey Linden, Middlesex, New Jersey.

"The information in your reports is the best available anywhere."--Ms. Jennifer L. Johnson, Seattle, Washington.

"The *Report* is always fair, convincing and very likely the best all-around animal welfare publication in existence."--Smiley Fowler, Greensburg, Indiana.

"We use your helpful, informative and outstanding publications for studies and discussions at our regular monthly humane society meetings. They help us to review and understand varied and worldwide humane programs and problems, and open new horizons of golden opportunities for humane service."--Mrs. John H. Cassel, Lebanon, Pennsylvania.

"I do not hesitate to say that I have found your publication of great assistance to me in my work particularly with lectures to school children and parents, and with the problem of surplus cats and dogs in our part of the world."--R. J. Calvert, General Secretary, The Royal SPCA, Western Australia Incorporated, Perth, Western Australia.

"KEEP UP THE GOOD WORK. Your service is an invaluable source of knowledge to this society for the prevention of cruelty to animals, and I don't know where this information would be obtained if you were not doing your work."--Edward J. Blotzer, Jr., President, Animal Care & Welfare Inc., SPCA, Pittsburgh, Pennsylvania.

"Your publication has helped me 'see the forest' and enabled me to help propagandize for the kind of animal control program that is sorely lacking here."--Mrs. Alex Cattan, San Juan, Puerto Rico.

"I find your *Report to Humanitarians* invaluable to me in my work as a director of the Ottawa Humane Society. Your views on pet population, spay-neuter clinics, etc., are the sanest and well thought out of any I have read on the subject. And I have read much, I can tell you. Kindest regards and continued success in this vexing, frustrating, annoying yet rewarding field of animal welfare."--William Thomson, Ottawa, Ontario, Canada.

"I am president of the Lloydminster SPCA and think your paper is the best thing that ever happened in the humane movement."--Mrs. Goldie Oddan, Lloydminster, Saskatchewan, Canada.

"Indeed, we read each copy (*Report*) from beginning to end, and have found many useful and thought-provoking ideas therein. We have consulted you more than once. Three years ago you were one of the sources quoted when our committee on humane destruction persuaded our city council to hire a veterinarian to kill animals by injection of a barbiturate, thus replacing a very unsatisfactory gas chamber."--Mrs. Hilda E. Smith, St. John's, Newfoundland, Canada.

"I enclose a renewal. I sure do enjoy reading your common sense, middle of the road, practical, non-emotional articles. It is a welcomed relief from the run-of-the-mill, 'teary-eyed slush' that is standard fare for so many humane publications. Thank you for being you."--Dr. William W. Gibson, Nacogdoches, Texas.

"My experience in writing all those letters and the comparative lack of response is most revealing. It seems to indicate to me that the only chance of success against the terrible conditions which exist for the animals in a wide variety of situations--pounds, laboratories, pet shops, in the wild, in slaughterhouses--lies in just such organizations as yours. And there is only one like yours, apparently, judging from the communications I receive from other humane organizations. It seems to me you have the brains and the clout, based upon your membership rolls, which are required in order to combat the heinous conditions which prevail for the animals in the US."--Mrs. Gouri P. Ivanov-Rinov, Dublin, New Hampshire.

"We have felt for a long time that there is a large void in the humane movement, and we feel you are trying to fill it. Your reports on euthanasia methods alone have been worth our membership dues."--Mrs. Alonson A. Remley, Hackettstown, New Jersey.

### MEMORIAL CONTRIBUTIONS

have been received from . . .

Mrs. Hugh McGrail, Dorchester, Massachusetts, in memory of her son John, who worked hard for a number of years for a law to abolish the leghold trap in Massachusetts. He passed away April 7, 1974, before the law was passed.

Ms. Geneva M. Megie, La Porte, Indiana.

Dr. Judy Mendels, Luzern, Switzerland, "in memory of my dearest cat Poesje, found as a stray kitten with three and a half legs and who lived with me in the US and in Europe for more than 16 years, and of my exceptionally intelligent and loving dog Topsy, taken from the animal shelter as an eight-month-old puppy, who died, after many travels from and to the US, at the age of 14."

Mr. and Mrs. Gerald B. Szukalski, Oak Creek, Wisconsin, "in memory of our senior citizen, Ruff. We had to make the heartbreaking decision to have him put to sleep on May 12. He was a loving, dear friend and a kind old gentleman."