

In order to make this meeting less time consuming, and so that we can address all the changes in the ordinance, the kennel owners group has decided to have me speak on their behalf. It is very important to everyone sitting in this room that what we have to say is heard and taken into consideration, and we were assured that that was the purpose of this meeting. What we would like to do is to first introduce the people in the room and familiarize you with their years of experience conducting business in the county.

Introductions

We would like to start by determining what the problem is that brought us all here. I will put the ball in your court and ask you to tell us what problem is you are attempting to solve with the ordinance changes, and how these ordinances will solve that problem? Obviously, you think that there is a problem or we would not be here, so...

To start, we do not accept the premise that a problem with LA dog kennels exists. There are ordinances and laws currently in place that are working. 98% of the kennels are getting A ratings. We are not the cause of "the problem," and yet all of your solutions are aimed at US! Norm Hickling stated that the grading system didn't work because each inspector interpreted things differently. That is an inspector training issue. We have this jumble of ordinances that took us hours to even go through, and we still do not understand them. The proposed changes are vague and complicated, which will lead to further confusion by the multiple inspectors. It will take quite a bit of training to make these ordinances clear to your inspectors.

Everyone in this room is afraid of you, your department and the rest of the people who are members of Antonovich's Puppy Mill Task Force. You might immediately want to ask why is that? If we are following the laws, why should we be afraid? The first reason is we are all sitting here having this meeting in the first place. We are legitimate breeders and kennel owners and have been conducting business legally in this county for decades. We have consistently received A ratings from Animal Control. We care about our animals and are trying to do things the "right way."

Second; the first act of the Puppy Mill Task Force was, without notifying us, an attempt by James Bell of Regional Planning and the Task Force, to remove our right to breed dogs on the property we purchased specifically for that purpose. Luckily, the Regional Planning Commission was appalled. They felt the problem was a lack of enforcement by Animal Control, and we absolutely agree.

Third; the people that have advised you and basically brought this about, are extreme animal rights groups. They believe that people in this room should not be allowed to exist. They have "beliefs" that are radically different from ours, and since we were never invited to participate until we insisted, we have the impression that perhaps you hold the same beliefs they do.

Fourth: the proposed ordinance changes seem to be more aimed at punishing breeders than to protect the animals. They are not well thought out, do not consider the specific needs of individual breeds of dogs, and particularly, in the case of the individual licensing of our retired females, they are cruel. We also find the criminalization of dog breeders and owners outrageous. Violations of these ordinances do not meet the level of gravity to designate them as a misdemeanor. Typically, an infraction is a violation of a rule, local ordinance or regulation. These are ordinances, and there is not a sufficient threat to the public that supports an escalation to misdemeanor status.

As I already mentioned, the Regional Planning Commissioners felt the problem, that started all this at the Lancaster kennel, was due to a lack of enforcement. During the period of time the Lancaster kennel was in violation, many of the kennels owned by people in this room were not inspected for

almost two years. At about the same time, lawsuits were filed against the Dept. Of Animal Care and Control for conditions that existed at the shelters. Ms. Mayeda stated that the problems were due to a lack of staffing because it was a "high turn over field and lower waged work." I can appreciate the difficulty, but we believe the lack of staff and the distraction with the Shelters' problems led to this lack of enforcement. Whatever the cause, the inspections were not done in a timely fashion, and we feel that is what allowed the poor conditions and violations to exist at World Kennels. We would prefer it if Animal Control employed a more "Community Policing" type approach, where a dialogue is formed with kennel owners vs. just making laws and trying to enforce them with limited resources, especially given the current state of the economy. Most Police Depts. have changed their methods of policing to include this approach because they found that the way Animal Control is currently operating does not work. Instead, it creates fear in people whom the laws are supposed to be protecting.

First address the discrepancies between the summary and the draft. 15 to 50 or just 50? Which is it?

Cost to County

•Required staffing for over 50-

Will the County Shelters be held to the same standard? If not, why not? If the ordinance is intended to ensure the safety and well being of animals, why would the County not follow their own ordinances? COST.

•Elevating infractions to misdemeanors-

Right to public defender and jury trial- Expensive- unnecessary. 'Has never been shown that increasing the penalty deters lawbreaking.

•Multiple Inspections-

Expensive- Not enough Inspectors. County may be forced to hire inspectors, not to mention annual inspections requiring up to three inspectors is VERY costly to County. All of these ordinances require extra training for inspectors at a time when the County can least afford it. Turning them loose on kennels without that training could lead to litigation. Untrained employees are "dangerous" and their acts can lead to litigation if they interpret the ordinances incorrectly. A kennel owner could be charged with a CRIME as a result of an untrained inspector. The County could then be ordered to pay kennel's legal expenses if wrongly accused. The County will need to keep records of ongoing training of inspectors since they can now charge kennel owners with crimes. More costs for record keeping. Once again, we feel the changes are not needed. The grading system and annual inspections are working.

•Record Keeping-

We hand over records, takes County personnel time to analyze. Private records. Who will handle those records? We ask our clients to sign contracts with us. They are not agreeing to have their information passed along to others. 'Could be something that brings about litigation if the information is used improperly by shelter/dept. employees.

•Advertising Requiring Personal information-

Name, address, license number. Invasion of privacy. Litigation if private information is not handled properly.

•24-hour staff-

Attending to animals would create a huge cost to the County. If the County does not follow this

protocol in their shelters, it is obviously not necessary and appears to be merely punitive to kennel owners. Potential litigation.

•Changing the word “kennel” to “facility”-

First... why is that necessary? ‘Could be considered a “taking” under the constitution. Litigation. Changing from “kennel,” which is well defined under state law, to “animal facility” will mean that any person with an unaltered male and female will be subject to the provisions. This will increase the number of County staff required for inspection and licensing.

No definition for the term “Animal Facility.” There is no State definition, only the word kennel is defined by the state.

•Microchips-

Will inspectors have a gun to read all microchips? ‘VERY time consuming inspections that will cost the County HUGE sums of money.

•Grooming-

Will this be the case in Shelters as well? If not, why not if it is a safety issue? HUGE COST TO COUNTY.

•Exercise-

Is the County doing this? If not, why not? Well being for shelter dogs should not be different than breeding dogs. Expensive.

•Fire Extinguishers-

‘Not specified which is required. Extinguishers or sprinklers? Will the County be sending building inspectors to determine that? Huge Cost.

•Fire evacuation plans-

‘May vary based on location. Will the Director be conferring with the Fire Dept. concerning each individual kennel to determine the safety of the plan, or will the Fire Dept. also be asked to inspect? More County money. Also, this requirement seems to imply that it is the law that animals are evacuated in case of fire. Is that the case? What if people are injured trying to evacuate animals? County could be liable if this is a required law that brings criminal penalties for non-compliance.

•Limiting the number of litters-

Restricting the breeding of dogs, neutering etc. is taking a right away from an individual, which is a violation of the US Constitution. A taking without due process. Could result in litigation.

You cannot force people to get a mixed breed at the shelter by regulating legitimate breeders out of business. People will get what they want one way or another, so you will be creating a situation that will require even MORE County resources to fight. Consider the war on drugs for example.

You want to address “over-population” of dogs in the county. The breeders sitting here have NOTHING to do with that. Again, and with that fact in mind, these ordinances are unnecessary and takings of our rights. There is no proof that points to LA County kennel owners as the cause of that alleged problem.

Cost to Kennels

The first thing you learn in successful business operation is CONTROLLING UNNECESSARY EXPENSES. This is a lesson that governments have never learned, and I think we can look at where we are today as proof of that. We are operating businesses, and these ordinances are placing unfair and unnecessary costs that could easily drive us out of business at a time when CA and LA cannot afford it. Is it your intention to drive us out of business?

•Excessive fees for multiple inspections and multiple licensing-

Boarding kennel, breeding kennel, individual licensing. WHY should a kennel have to individually license a dog??? We have NO idea what a health inspector will be looking for, and there is nothing in the proposed ordinance changes that point to a need for a health inspector. We have operated our kennels for decades without them. Why is this necessary now?

•Minimum staffing-

'Huge cost to businesses. No minimum staffing for Vet. Hospitals where animals are sick. Not necessary when following other ordinance safety requirements already in place, i.e. dog runs where dogs are safely kept. How will AC enforce this? Will we be required to turn over employee information, pay records or our tax returns? What if a worker quits when there are 75 dogs on site? We could then be charged with a CRIME. I don't know of another company that faces that! Will there be a hot line where we can report this? Unskilled people who have no clue how to "really" care for certain breeds will require training, that costs money. The County shelters have this issue and it has caused them problems, lawsuits etc. As you, Ms. Mayeda, have stated to the BOS, it is a "High turn-over field for lower wages." What if it takes some weeks to find a replacement? No definition of "attend to." Also, AR people infiltrating kennels is a real concern and has already happened.

•Grooming-

'No definition of what AC considers grooming. Describe what "injurious" is. 'VERY different for different breeds. 'Requires knowledge of that breed. 'Vague and open to various interpretations.

•Housing Males and Females separately-

VERY costly as far as utilization of space. Already minimum space requirements, and now only one dog per run. Breeders remove the dogs when the female is in heat for safety, and may keep dogs together the rest of the time. Boarding kennels will be forced to use more runs for breeding stock leaving less room for boarders. 'HUGE loss of income. 'Demand for exercise and socialization with other dogs, but this requirement makes doing that IMPOSSIBLE.

•Minimum Exercise requirement-

More staff or installation of exercise areas. Different requirements for different breeds. BIG expense.

•Microchips-

'Huge expense. Unknown health effects- why microchip all dogs when the dogs are not leaving the property? What is the problem with tattoos as permanent ID and not harmful to health? Will kennels be required to have a reader for inspectors to check for compliance? MORE COST.

•Annual Vet Exams-

People do not even take their children to the doctor every year -- they take them if they are sick. An exam will NOT determine health for breeding, as there are no tests for that. 'Exam in January will not determine health in October. Incubation period for disease etc.

•Smoke Alarms/Sprinklers /Extinguishers-

Several examples cited with no guidance regarding which one is required for what. Will we have to pay for building inspectors?

•Evacuation plans-

'Vary depending on location of kennels. Will we be required to own huge vehicles that can haul large numbers of dogs? Will we have to pay experts to tell us the best plan? MONEY.

•Heating and Cooling "as required"-

Required by WHOM? The inspector? What temperatures are required? What is too hot or too cold? Different requirements for different breeds. Who will monitor that? What type of building will be required to heat and cool? Will we have to maintain records for that? How will that requirement be enforced?

•Enclosures cannot be placed on top of another animal enclosure-

There are safe enclosures that are manufactured this way. They are used by kennels, vets and the County's shelters. Will these be removed from shelters? Again, one size fits all and it does not. 'Depends on the breed.

•What is a working animal-

No definition

•Requirements for spaying of breeding dogs-

Redundant if eight years of age is the rule. It is another added and unnecessary cost. It simply imposes a belief system concerning animal health since it is a redundant requirement.

•Requirement to spay and then individually license retired females removing them from the umbrella of the kennel license-

First: extra and UNNECESSARY expense to kennel. 'Emotional blackmail. First, I would like to ask Ms. Reagan why this is necessary.

[NOTE TO LIST: I want her to tell us why. She may make a mistake and say it is because old dogs should be in the house. If she does that. OH MY. That is a belief she is imposing on us using the law. That's a no-no IMO, although I am not a lawyer, I think these beliefs are a BIG problem. There is a legal term for belief vs. positive knowledge: <http://legal-dictionary.thefreedictionary.com/belief>. I want to ask Evan about this also or another lawyer who may specialize. This, to me, goes to Freedom of Association in the constitution.]

'Requires us to KILL or place any female if we have more than three -- we are allowed three pets. Stops us from taking back dogs who may have lost their homes, since it seems you are insisting that spayed animals be individually licensed as pets. We do not view our dogs as products to be disposed of when their expiration date passes. You will force us to be the type of kennel you claim you are trying to prevent. This will make us criminals if we want to take a dog back to save it's life or even if we want to save a dog who is in the shelter since we will be exceeding our "pet" limits.

•Proper Shelter-

What is that? No definition provided. Dog house, cover over run? Who decides what is "proper?"

'Vague leading to the same problem Norm cited at our last meeting, individual inspector interpretation.

•Record keeping to turn over to County-

Requires extra time completing forms. Another unnecessary expense. We are already keeping records. Requiring them to be turned over is not only a privacy issue but double work. Contracts are private.

•Changes not in the best interest of the animals-

While maybe well intentioned, as written, these proposed ordinance changes are dangerous, in that they require the same type of care for different breeds of dogs. We breeders are the experts here, not a govt. agency that knows nothing about breeding or animal husbandry. An attorney is writing these ordinances. She is not experienced in animal husbandry, she is a legal expert.

•Separate licenses for sizes of dogs-

Some breeds cross over two of the listed size windows. Does that mean they will be required to get two licenses? Will they have to call out THREE GOVT. INSPECTORS to re-inspect anytime they produce a larger or smaller animal of the same breed? Will inspectors be bringing scales to the inspections? Will kennels be required to have scales on site? Will the license be for breeds or for sizes? 'Cannot determine that by reading ordinance.

•Requirements to keep pups with females until 6 weeks-

Dangerous for pups from individual breeds. 'Can create bad habits. Requiring vet statements is costly when the breeder already knows what is best. Imposing another "belief" vs. the "positive knowledge" the breeders possess from years of experience with their breed.

The ordinances are vague and do not take into consideration the different levels of care required for each individual breed and therefore have the potential to be HARMFUL to animals vs. the intent of keeping them safe.

Everyone please bring a copy of the ordinance changes in case I need your [help](#).