

Senate Finance Committee SB 625

Position: Favorable with Amendment

Dear Chairwoman Kelley and Members of the Senate Finance Committee:

My name is Josh Kreinberg. I am the Chief Administrative Officer and General Counsel of PuppySpot. We are a USDA licensed and inspected service connecting people who wish to adopt a puppy.

Senate Bill 625 would expand the definition of "retail pet store" to include any for-profit establishment that, by Internet transaction, sells domestic animals to be kept as household pets, thereby prohibiting the sale or offering for sale cats and dogs by such establishments. While we support the legislation's intent of improving the welfare of the animals in our care, the legislation, in its current form fails to distinguish between those breeders that adhere to the highest standards of health and welfare from those that engage in substandard practices.

More than just a service, PuppySpot is a community of dog lovers whose mission is to make lives better by responsibly placing healthy puppies into happy, caring homes. The PuppySpot brand, with puppies at the center, is rooted in the belief that dogs should be celebrated and that owners deserve to experience trust, confidence and transparency when searching for their new companions. Because we respect dogs as much as we celebrate them, PuppySpot strives to continually improve our standards to ensure that animal welfare is always at the center of our system. We are committed to providing thoughtful consideration to the wellbeing and ethical treatment of the dogs at all times and at all stages of our process.

Our PuppySpot Gives Back Program continues our mission to celebrate dogs always and make a difference by integrating philanthropy into our corporate philosophy and actions. With a multi-prong approach, the program incorporates puppy placements through non-profit organizations for individuals and families who can positively be impacted by a new addition, employee volunteer days, and corporate donations. We are proud of our associations with numerous charities including the Make a Wish Foundation and the Wounded Warriors Project.

PuppySpot Helps Grant 1900th Wish in NY



authorization to join the PuppySpot network.

PuppySpot Gives Back To Another Warrior



PuppySpot is not a breeder. Instead, we work directly with a network of breeders around the country. Each of these breeder partners is thoroughly screened prior to receiving



We use a personalized approach that caters to the needs of the families and individuals in search of a new furry friend as well as the concerns of the responsible breeders who are looking for their puppies' forever homes. PuppySpot makes fetching your new best friend a simple and enjoyable experience.

PuppySpot is proud of our fully screened and vetted network of responsible breeders. Each breeder within the PuppySpot community is held to the highest standards, with the health, welfare and safety for all dogs (not just the puppies) as top priorities. Utilizing a comprehensive, proprietary screening process that is continually updated, PuppySpot invites less than 10 percent of breeders who begin the PuppySpot review process to join our exclusive

The PuppySpot Difference:
We Work with Only the Highest Quality, Most Responsible Breeders in the Country

Less than 10 percent of the breeder partners who enter the company's review process are accepted into the network.

- PuppySpot spends millions of dollars on a rigorous, proprietary screening and compliance program regarding our breeder network
- PuppySpot terminates breeders who violate or do not comply with our standards.
- PuppySpot's enhanced screening has more than 100 points of emphasis for every puppy and its parents, and we have more than 50 employees dedicated to breeder compliance.

community — ensuring that both our two- and four-legged friends receive a premium experience that is seamless and quality-driven.

Following the initial screening process, PuppySpot continues to monitor our breeders through rescreenings, our field representative program and ongoing puppy health tracking.

A few examples of our breeder screening standards include a background check of each breeder's history, including a review of available public records (such as inspection reports from the USDA), operational history records, and any contact the breeder has had with local, state and federal animal control agencies; a review of breeder facilities and practices to ensure that each breeder provides the best care for the adult dogs and puppies, including a comprehensive, standardized interview conducted either by phone or in person and an evaluation to determine if the breeder is in compliance with PuppySpot's Standards; a comprehensive set of photos and/or video documenting all physical aspects of a breeder's operation including but not limited to housing facilities, storage facilities, cleaning methods and exercise/socialization facilities must be sent to PuppySpot.

Continuing our commitment to healthy, happy puppies, we are working with American Humane, the country's first national humane organization. For over a decade PuppySpot has placed puppies with thousands of families from screened and vetted



breeders with a focus on expanded health and welfare standards. In its early stages, American Humane's animal welfare experts, researchers, and veterinarians will be thoroughly examining PuppySpot's breeders, practices and policies.

For more than a hundred years, American Humane has been first in promoting the welfare of animals and strengthening the bonds between people and animals.



PuppySpot is dedicated to promoting the health and well-being of all dogs, and as part of that commitment, we are proudly authorized by the American Kennel Club (AKC) to provide each of our puppy parents with a special AKC registration package from PuppySpot. The AKC is the largest purebred dog registry in the world and most widely recognized and respected in the US. Through its programs, events, and services they support and enrich the lives of all dogs and their families.

PuppySpot also provides continuing education for both breeders and new puppy owners, ensuring that all of the dogs we place are happy and healthy throughout their lives. We even offer a health guarantee for every puppy on the site.

Breeder Criteria



PuppySpot's breeders go through an application that requires paperwork, interviews, provision of living environment photos or videos and independent verification of data to ensure a breeder's high level of experience through pre-screening and ongoing review of ownership, operational history, field visits, criminal background checks, facility review, compliance evaluation, government and humanitarian data base review and veterinarian information.

A few examples of breeder criteria standards include, but are not limited to, a minimum 1.5 years of experience in canine breeding and a minimum of two litters before being permitted to join our network; an ongoing, formal relationship with an attending veterinarian and adhere to current written Program of Veterinary Care (a so-called, "PVC" which includes a veterinarian approved breeding plan, routine and preventative care, an examination schedule, parasite detection and elimination, exercise and socialization program, vaccination program, and any other elements recommended by the attending veterinarian); must send copies of all State and Federal inspection reports to PuppySpot; and must send updated facility photographs to PuppySpot at least once a year, and send updated photos to PuppySpot whenever modifications are made.

The breeders we work with must be in compliance with USDA and applicable state standards as a starting point, but we do not stop there. PuppySpot has developed a comprehensive set of animal welfare standards that exceed those of the government.

Adherence to Regulations

To ensure that a breeder is knowledgeable of and in compliance with all licensing requirements at every level and uses the USDA Animal Care Blue Book and USDA licensing requirements as key reference points for establishing best practices, the PuppySpot Scientific Advisory Board set standards that are above and beyond anything set by the government.

The PuppySpot Scientific Advisory Board's mandate is to continuously enhance PuppySpot's industry-leading standards with substantive, in-depth, science-based standards of practice for the company and its tens of thousands of breeder partners. The Board members' expertise spans fields relevant to ensuring the physical, emotional and long-term health of breeding dogs and puppies placed through PuppySpot's exclusive network of responsible breeders.

The Board is committed to constantly improving, refining and clarifying our standards to ensure they guarantee animal welfare. Using their wide range of professional expertise, the Board members scrutinize PuppySpot's requirements to ensure the physical and psychological health of all dogs in our exclusive network. Through PuppySpot's ongoing commitment to the wellbeing of dogs, utilizing the Board, we are raising the bar for canine welfare together.



A few examples of our standards related to the adherence of regulations include: a breeder must be knowledgeable of and in compliance with all federal, state and local licensing requirements. A copy of regulations is available on the USDA website; a breeder that is a licensed veterinarian cannot certify his or her own facilities or the health of the breeder's own dogs; PuppySpot may suspend its association with any breeder at any time and will automatically



do so in the case of any breeder found with either one critical, or three noncritical violations of animal welfare regulations in any 24-month period.

We have also recently penned a first of its kind agreement with American Humane, the nation's pre-eminent animal welfare organization. American Humane has subsequently established a set of comprehensive standards and audit tool. They are now in the process of auditing the breeders in our network.



PuppySpot also screens our customers to ensure every puppy goes to a happy, healthy home that is the best fit for the puppy and the individual/family. To guide customers to the perfect companion, we discuss the customers' lifestyles, their previous experience with dogs, their home environments, any allergies and other relevant information. From our first contact when we establish a customer's intentions for fetching their new best friend to our follow-ups in which we welcome the customer to our dog-loving community, PuppySpot is with the family each step of the way.

Our point is that we share your passion about the health and welfare of the animals in our care. We hope that the Committee does not advance arbitrary legislation that would deny your constituents the right to purchase a puppy sourced from reputable breeders and provide these dogs with a loving and caring forever home.