



## Economic Matters Committee

### SB 103

### Position: Oppose

Dear Chair Dereck E. Davis and members of the Economic Matters Committee,

**Senate Bill 103 as written:**

- **Limits consumer choice: especially, during a time when people are limited in ability to travel.**
- **Does not address concerns with substandard breeder practices.**
- **Fails to distinguish between breeders adhering to high standards and those who engage in substandard practices.**

**Additionally, the legislation related to this issue, passed in 2018, is still in litigation and awaiting appeal from the 4<sup>th</sup> circuit with a set hearing date that exceeds 2021 session. These issues need to be vetted before passing additional legislation.**

**As a trusted service helping connect people with healthy, happy puppies over the past 15 years, and a community of dog lovers with over 9,500 five-star reviews, PuppySpot:**

- **Encourages the committee to amend this legislation to focus attention on substandard breeding practices.**
- **Wants Maryland residents to be able to obtain puppies from reputable breeders and dealers.**
- **Encourages the consideration of alternative legislation to create a taskforce to study breeding facilities and the role of online portals between customers and breeders.**

My name is Josh Kreinberg. I am the Chief Administrative Officer and General Counsel of PuppySpot. We are a USDA licensed and inspected service helping people find puppies through our network of screened and vetted responsible breeders. Last year, we helped approximately 500 Maryland residents find their new best friends, including a number of Make-A-Wish children and their families. All of these new puppy owners were trapped at home, socially distant, like the rest of America, suffering anxiously through the global pandemic. We were honored to have been able to help so many during these trying times.

Senate Bill 103, as currently written, limits consumer choice and does not address concerns with substandard breeding practices. 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 who adhere to the highest standards of health and welfare and those who engage in substandard practices. Instead, we encourage the committee to amend this legislation to focus attention on substandard breeding practices while continuing to allow Maryland residents to obtain puppies from reputable breeders and dealers. PuppySpot would also encourage the Committee to consider alternative legislation to create a taskforce to study breeding facilities and the role of online portals between customers and breeders to better inform the Senate on the most effective approaches to dealing with concerns about animal health and welfare.

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.



The ongoing COVID-19 pandemic has created a new challenge for families in Maryland and other states seeking to add a new four-legged companion into their lives. PuppySpot has played a key role in delivering happiness during these unprecedented times. Combining our network of screened and vetted breeders with our logistical capabilities, we have been able to meet the needs of Marylanders who had been struggling to find a pet without leaving their homes.

PuppySpot is particularly proud of the work we are doing with the Make-A-Wish Foundation nationally, and most especially the work we have begun with Make-A-Wish' Mid-Atlantic chapter which includes Maryland. Travel restrictions, delayed or cancelled commercial flights, and other factors caused by the COVID-19 pandemic combined to limit the ability of the Make-A-Wish organization to grant travel wishes. As a result, Make-A-Wish was hit with a huge uptick in puppy wishes as children wished to have a new best friend that would be by their side. By partnering with PuppySpot, Make-A-Wish has been able to continue its mission to grant life-changing wishes to children with critical illnesses. In the past month alone, PuppySpot has been part of two wish grants in Maryland-- one for a young boy with a blood disorder who wished for a Labradoodle, and another for a young girl with leukemia who wished for a Portuguese Water Dog.

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 Make-A-Wish, Sydney's Soldiers Always, METAvivor, and Wounded Warrior Project.

### Wish Come True for Maryland Child with Blood Disorder



### PuppySpot Celebrates 50th Puppy Wish with Make-A-Wish



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 authorization to join the PuppySpot network. 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.

**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.

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 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.

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.

Continuing our commitment to healthy, happy puppies, we are working with American Humane, the country's first national humane organization. For more than a hundred years, American Humane has been first in promoting the welfare of animals and strengthening the bond between people and animals. American Humane's animal welfare experts, researchers, and veterinarians are examining PuppySpot's breeders, practices and policies. They have subsequently established a set of comprehensive standards and an audit tool. They are now in the process of auditing the breeders in our network. Through our internal auditing, we have dismissed 14 breeders for failing to comply with our standards. Nearly all of our breeders that have been audited by American Humane have passed on their first inspection. Those that have had minor deficiencies (those not involving imminent threats to animal health or welfare) are given the option to correct the deficiency or be dismissed from our network. If, at any time we discover an imminent threat to animal health or welfare, the breeder is immediately dismissed from our network and USDA is notified. Since we are not a government entity, we are not subject to due process requirements and are not required to offer any appeal. As such, breeders have no appeal from our decisions.

**AMERICAN HUMANE**  
FIRST TO SERVE™



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. One of the services we partner with the AKC to offer are OFA (Orthopedic Foundation for Animals) health clinics for adult dog testing. 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. We describe our processes on our website at <https://www.puppyspot.com/puppyspot-standards>.

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 (a team of veterinarians and scientists, who are former regulators from the USDA, legislative and regulatory experts and animal ethicists experienced in breeding and shelter medicine) set standards that are above and beyond anything set by the government (the bios of our Scientific Advisory Board are also set forth on our website).

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.

PuppySpot Delivers Joy to U.S. Army Veteran



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.



## Protect Against Pet Scams

### Beware of these **RED FLAGS** when looking for a puppy



#### Wiring Money

Never wire money via Western Union or Moneygram to anyone you have only met online.

Scammers have begun using peer-to-peer payment platforms such as Venmo, CashApp, Google Pay, Apple Pay, Facebook Payments, and Zelle to receive payments.

#### Suspicious Photos

Beware of puppy images that look like stock photos- perfectly posed or where puppy doesn't look real.



Conduct an online image search of the photo to see if it is posted elsewhere.



#### Bad Grammar or Misspellings

Be sensitive to strange language choices in puppy listings or communications. The vast majority of scammers are from foreign countries.

#### Bogus Stories/Excuses

Scammers will often come up with complicated reasons why they need immediate wire transfers or can't deliver the puppy to you, consistently tied to current events.



#### Refusal to Supply Documentation

A responsible breeder, shelter, or rescue organization will provide registration, vaccination, and veterinary health records upon request.

### HAVE YOU BEEN A VICTIM OF FRAUD?

BBB ScamTracker has 907 reports on this type of fraud and a Federal Trade Commission report found some 37,000 complaints involving pets.

**Email:**  
fightpuppyscams@puppyspot.com

**Call the Federal Trade Commission:**  
1-877-FTC-HELP

**Call Department of Homeland Security:**  
866-DHS-2-ICE (866-347-2423)  
*(from U.S. and Canada)*

**Contact the FBI cybercrimes unit**

## Fight Pet Scams

As reputable sources continue to be scrutinized, the rate of pet scams continues to rise. PuppySpot is working to fight pet scams by reporting as many fraudulent sites as possible—we even run a reporting service on our website where we gather information from members of the public who have been scammed in order to assist in reporting them. Online pet scams are more prevalent than ever amid the pandemic. Individuals are seeking the companionship of a furry friend and many don't know where to turn. As travel restrictions and quarantines continue, many are unable to visit a local animal shelter or breeder in person.

We publish tips for consumers (including those set forth here) and always advise doing as much research as possible before making the decision to purchase a pet online, or in person. Recently, I was interviewed by Yahoo! Finance and Money.com and we previously appeared on Good Morning America to warn the public about these scams and offer tips to watch out for (we have links to many of these articles and appearances on our "In the News" section of our website at <https://www.puppyspot.com/about-us>). Some of these include checking sources, watching out for bad grammar, and avoiding wiring money via Western Union or MoneyGram. To help avoid pet scams, consumers should be made aware of these red flags and do research on the responsible sources that exist.

## Good Intentions, But Need Additional Review

Our point is, 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 obtain a puppy sourced from reputable breeders and provide these dogs with a loving and caring forever home. We believe the residents of Maryland deserve at least the opportunity to have the issue studied to properly gather the facts, evaluate the scientific, health and animal welfare practices already in place to determine what should be done in the best interests of the families and most importantly the dogs involved as a next step.