

EXHIBIT B –
Declaration of
Amy Katherine Taylor

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ENVIGO RMS, LLC,

Defendant.

Case No. 6-22-cv-00028-NKM

DECLARATION OF AMY KATHERINE TAYLOR

I, Amy Katherine Taylor, declare the following to be true and correct to the best of my knowledge and based on my personal knowledge and on information collected from staff:

1. I am employed with the Virginia Office of the Attorney General as an Investigator in the Animal Law Unit. I have been an Investigator with the Office of the Attorney General since 2020. As an Investigator, I investigate animal crimes that occur within the Commonwealth of Virginia and analyze evidence. I also provide training and education for law enforcement, animal control, and prosecutors.
2. I am also on the Virginia Animal Fighting Task Force, a 501(c)(3) organization that assists law enforcement in responding to animal cruelty, animal fighting, and large scale investigations in the Commonwealth of Virginia. I have been an investigator for the Virginia Animal Fighting Task Force since 2007.
3. I was the lead building and enclosure assessor who assisted the United States in the execution of the federal criminal search warrant from May 18, 2022 to May 22, 2022 at Envigo RMS's Cumberland, Virginia facility. As the lead building and enclosure assessor, I led a team of law enforcement and animal control officers that conducted evaluations of the

individual buildings and individual enclosures at the Cumberland Facility. In my capacity as lead building and enclosure assessor, I laid my eyes on every single building and every single enclosure that contained beagles at the Cumberland Facility.

4. I observed that there were enclosures with numerous animals in them, and that there were enclosures that contained nine or more dogs. *See photo below.*



For example, enclosures 9A102, 9A103, 9A105, 9A106, and 9A107 all had 10 dogs in them, and enclosures 9A124, 10A16, 10A23, 10A24, and 10A25 had 9 dogs in them. In many enclosures, I observed that one beagle would be hunched in the corner in a manner that indicated it was overwhelmed.

5. In the same buildings where I saw overcrowded enclosures, I also observed that there were enclosures that were empty. In G2, which housed dogs that were sale stock, I observed at least 20 empty enclosures in one building. In G3, which housed the nursing mothers and their puppies, I observed that 25% or approximately 30 enclosures were empty. In G1, which housed the breeding male beagles, I observed 40 to 80 empty enclosures.

6. I noticed that there were empty enclosures that contained dried feces as well as

old bedding and shavings, as if the enclosures were not thoroughly cleaned and sanitized after dogs were removed from the enclosure.

7. Each enclosure only had one food receptacle, which allowed only one dog to access the food at a time. *See* photo (The feeder is at the bottom left corner of the enclosure at the bottom of the page. The photo shows one beagle eating from the feeder.). I saw multiple beagles exhibiting behavior indicative of resource guarding in front of the feeders.



For example, I observed dogs laying in front of the feeder with their head in the feeder and, when another beagle would approach the feeder to attempt to eat, the dominant beagle would start to growl.

8. Each enclosure contained one watering system that was on a spigot or lickit system, which allowed water to come out of a small mechanism at the bottom of the lickit system when an animal licks the system. I observed dogs guarding the lickit systems. Some of the lickit systems were only a few inches off the ground of the enclosure, so that dogs could only access water by licking the dirty floor of the enclosure. I observed that puppies could not

lick the lickit system hard enough to activate the system to access water. When I reached in to an enclosure to release water from the lickit system, the puppies began to vigorously drink water from the lickit system as if they had not been able to access water in a very long time.

9. The odor was extremely strong in the buildings, and I observed cockroaches, flies, and moths throughout the buildings. I also saw a large buildup of rodent feces in various buildings. I observed that even those enclosures that had been cleaned in the morning by employees continued to have feces on the walls and floors.

10. The interior of the buildings were hot and muggy. When I conducted the initial walk through of the Cumberland facility on May 18, 2022, I did not observe any air conditioning units visible in the building. On Friday, May 20, 2022, when I was in the G3 building that contained nursing mothers and their puppies, I saw that air conditioning units were in the process of being installed. By the time that the execution of the search warrant was complete, I still did not observe air conditioning units in every building of the Cumberland facility.

11. Each enclosure had a guillotine door that had to be manually opened and shut to allow the dogs to go in and out of the enclosure. Many of the guillotine doors had dirt and filth build up, and many other guillotine doors were chewed on the bottom.

12. I also observed that there were transition doors in the enclosures that contained rust. Other transition doors contained sharp edges that could harm the beagles. I observed transition doors with buildup of grime and filth. I also observed feeders with buildup of grime and filth.

13. In the building that housed nursing mothers and their babies, the guillotine doors that allowed access to the outdoors were shut so that nursing mothers had no access to the

outside. This building was very hot and humid, and I observed puppies pulling themselves out of the whelping bin to lay on the floor of the enclosure in an attempt to cool down. I also observed that there were many electrical cords hanging down from the heat lamps above the enclosures, and that the electrical cords were dangling so low that an adult beagle could reach it.

14. The flooring in the enclosures were made of grates, and allowed for the feet and toes of the beagles to slip in through the grates. The building that contained the nursing mothers and their babies contained black rubber mats on top of the grated flooring, and in more than 12 separate enclosures I saw that the black mat had shifted and moved in a way that exposed the grated flooring underneath. *See photo.*



15. In other buildings, I had to assist six dogs to get their toes and feet out of the grate. For many other dogs, I observed dogs slip through the grated flooring but eventually maneuver themselves out. A few times, I observed larger beagles slip into the gaps with their

entire leg in the gap in the flooring and, after a few tries to try and maneuver out of the flooring and pull themselves out of the grates. Many of the enclosures contained large gaps between the flooring and the walls of the enclosures.

16. Some of the flooring in the enclosures had larger gaps where the flooring was worn or chewed. In those enclosures, the plastic coating of the metal bars of the flooring had been chewed off and the rust was coming off the metal bars. In other places, the flooring did not reach the kennel walls. The flooring had gaps that could allow beagle dogs and puppies to get their feet stuck in the gaps in the flooring.

17. I observed some floors bend under the weight of the dogs, and that when dogs jumped the flooring moved and created significant gaps and access to the waste pit below the enclosures.

18. In enclosures, I observed cobwebs, rat and mice droppings, insects, and dead cockroaches. In some buildings, I saw black mold on the ceilings.

19. I saw that food was underneath the food receptacles, and observed bugs crawling and flying out of the moldy food. In the whelping building with nursing mothers and puppies, some food receptacles had no lids. I observed that the food inside the food receptacles had



moisture, filth, bugs, hair, dirt, and feces in it. *See* photo above. I personally found two neonate puppies inside of the food receptacles, which is dangerous to the neonates because they could get trapped in the feeders and dangerous for the nursing mothers if the food becomes contaminated by feces from the neonate.

20. I observed employees cleaning the enclosures. While the employees were powerwashing the enclosures, I observed that the dirty water was splashing into the feeders. I noticed that, after employees went through the building to power wash the enclosures, no employees went through the building to spot clean the enclosures. In the building housing nursing mothers and their puppies, I saw that employees would power wash the enclosures but would only wash the top side of the black rubber mats that were on top of the flooring. I did not see the employees ever remove the rubber mat to clean the other side of the mat or the grated flooring underneath. After the powerwashing was complete, I observed that the rubber mats still had dirt, grime, and feces on them. In addition, I observed the mats folded over by the dogs exposing the underside of the mats. *See* photo below.



21. I saw fighting between dogs in the same enclosure, including dogs fighting over access to the feeder. Most of the fighting I observed between dogs in the same enclosure occurred in enclosures with at least four dogs inside of the enclosure. On multiple occasions, I had to hit food receptacles and rattle the doors of the enclosures to distract the dogs and stop them from fighting. I saw such rampant fighting that I constantly had to stop my work assessing the enclosures to open the doors and physically intervene to stop the fighting

22. I also saw fighting between dogs in adjacent enclosures, who were standing on their hind legs to fight through the gaps in the fences. Once the fighting between beagles in adjacent enclosures began, I observed that beagles inside the enclosures began to fight.

23. On June 8, 2022, I returned to the Cumberland Facility to assist the United States by checking for compliance with the Court's May 21, 2022 temporary restraining order. ECF No. 6. In this role, I spent approximately five hours at the Cumberland Facility and walked through each of the buildings housing beagles at the Cumberland Facility.

24. I observed that enclosures continued to have numerous dogs, and that several enclosures had 10 dogs in an enclosure. I again noticed that there were empty enclosures in the buildings.

25. I observed the cleaning of the enclosures. When the cleaning process was begun, the guillotine door separating the inside and outside portion of the enclosures was shut and all beagles in an enclosure were confined to either the inside or outside portion of their enclosure. The beagles remained in this portion of their enclosure for hours until all of the enclosures in the entire building were cleaned. In G2 building 2, where I recorded a temperature of 90 degrees, even though the cleaning of the building was complete I noticed that the guillotine doors separating the inside and outside portions of the enclosure were still

closed. The beagles that are confined to the outside portion during this time period do not have any access to water or food, as the lickit water systems and food receptacles are all located in the inside portion of the enclosure. I observed one or two enclosures that had water receptacles in the outside portion of the enclosure, but there was no water in the receptacles.

26. I recorded temperatures in the high 80s inside certain buildings, including a temperature reading of 89 degrees in G2 building 6 and 86 degrees in G2 building 3. I also recorded a temperature of 90 degrees in G2 building 2. As I was moving through the buildings to take temperatures, I pointed out the high temperature to employees. I then observed employees placing fans in the buildings with enclosures and spraying water on the interior walkways. Although I observed some movable air-conditioning units, they were not always in use. In G3 room 1, which houses nursing mothers and their new puppies, the air conditioning unit was not turned on.

27. I saw an enclosure housing beagles with a guillotine door containing very sharp edges and told an employee that beagles should not be kept in that enclosure because the beagles could injure themselves. I also observed transition doors in G1 building 1 with sharp edges and other guillotine doors that had been chewed. I saw a crooked guillotine door with missing screws.

28. I observed that some enclosures had new black mats installed on top of the grated flooring in the enclosures, and that these black mats were installed in both the indoor and outdoor portions of the enclosures. The mats are not porous and, thus, allow liquid as well as urine and feces to pool so that the beagles were forced to stand, sleep, or lie in their own excreta. *See* photo below (liquid pooled on top of the mat).



I personally observed that in some enclosures where the mats had been installed, beagles were standing in their own urine and feces. *See* photo below (beagle standing in urine).



The mats were installed in a way that still allowed gaps between the edge of the black mat and the walls of the enclosures, and I observed gaps of up to 2 inches that could allow for a beagle's foot to get stuck and be injured.

29. The black mats installed in the exterior portion of the enclosures were in sunlight. I touched a stack of black rubber mats outside one of the buildings and the black mats were so hot that I felt like I had been burned and snatched my hand back.

30. I observed that the whelping building containing nursing mothers and pregnant mothers had the same black rubber mats with small holes that I observed during the execution of the search warrant. I continued to observe these mats being chewed, and also saw mats that were filthy and other mats that had been rolled back to reveal portions of the flooring underneath the mat.

31. I observed that in certain enclosures the floors, consisting of the grated flooring and the black mats installed on top of the flooring, bowed up and bowed down when all of the beagles were in one portion of the enclosure or were running around in the enclosure. I observed the bowing floors to occur more in enclosures that contained four or more beagles.

32. I observed beagles with veterinary issues, including a beagle with bite wounds on the ear and a fluid-filled pocket. I also saw a beagle with significant damage to the ear and an amputated tail. In G1, I saw a beagle with only one ear. In certain enclosures, I saw pale white-yellow foamy vomit that is indicative of a dog being overheated. I also observed puppies that were lethargic. I pointed out a beagle that was favoring one leg to Envigo staff. The employee then removed the beagle from the enclosure and set the beagle on the ground to see if it would move. When the dog flattened to the ground, the employee placed the beagle back into its enclosure rather than further assessing the condition of the dog.

33. As to paragraph 1, which provides that “only compatible dogs [be] housed together in an enclosure,” I observed a beagle being aggressive towards other beagles in its enclosure and asked employees to remove the aggressive beagle from its primary enclosure. I

also saw beagles actively fighting within a primary enclosure. When an Envigo employee did nothing to address the fighting, I stopped my assessment and asked the Envigo employee to separate the fighting beagles. In the enclosure containing the fighting beagles, there was also one beagle cowering in the corner. Envigo staff removed the cowering beagle from the enclosure and took it to Building 96/97, which I observed contained individual enclosures for beagles that Envigo staff have determined to be aggressive or withdrawn.

34. As to paragraph 3, which requires that “every puppy who is no longer housed in the same enclosure with their nursing mother [be] provided access to potable water from a water receptacle that the puppy can easily drink from without any assistance,” I observed that some plastic water bowls had been placed inside enclosures containing puppies. However, I saw that there were water bowls containing no water. I also observed puppies chewing on the plastic water bowls and had to open an enclosure to remove the plastic ring of the water bowl from the mouth of a puppy. I observed that no water bowls had been installed in enclosures in G3 room 2, which housed small puppies that, based on my previous experience during the execution of the search warrant, would not be able to access water from the lickit systems in the enclosures. When water was put inside water bowls and placed inside the enclosures, the small puppies started to drink from the water bowls.

35. As to paragraph 4, which requires that every beagle be provided “uncontaminated, wholesome, palatable food,” I observed that food receptacles continued to lack lids or the lids were broken. I randomly opened food receptacles and used a flashlight on the food in the receptacle, and personally observed bugs flying out. I was told that employees only clean or sanitize food receptacles once every 14 days. In the meantime, they place new food on top of the old food.

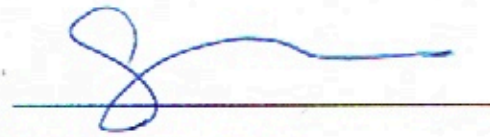
36. I also observed some enclosures that contained food bowls with kibble.

However, the food bowls could be turned over by the beagles, exposing the food to the feces on the mats. *See photo below.*



Under penalty of perjury, pursuant to 28 U.S.C. § 1746(2), I declare the foregoing to be true and correct to the best of my knowledge.

Executed on June 10, 2022.



Amy Katherine Taylor