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## When 'Puppy Mill Rescue' Blurs The Line Between Saving And Selling Dogs

Questionable practices inside the high-profile nonprofit National Mill Dog Rescue are not what most people expect "rescuing" to be.

By Kim Kavin

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One Saturday in 2014, a woman named Theresa Strader stepped onto a TEDx event stage in Colorado Springs and waited quietly to speak. On a large screen, a video played of her reading a letter she had written, but never sent, to the breeder of her Italian greyhound Lily. In the video, Strader wiped tears from her cheeks and repeatedly paused to catch her breath, as she described dogs like Lily being imprisoned in cages their whole lives — sadness and fear in their eyes, lower jaws rotted away, never once able to run or play — all because the breeder was solely interested in producing puppies at any expense. Photos of Lily, deformed and painfully thin, flashed across the screen. In one, the dog stood in a wire cage, a tag with her auction lot number, 251, hanging around her neck.

After the video played, Strader walked to center stage and talked about how her visit to the dog auction where she bought Lily seven years earlier had changed her life. She described her first sight of Lily and dozens of other dogs, how she was left speechless at their living conditions, how she sank to the ground in tears. During those first moments at the auction, she said, she decided to found a new kind of dog rescue organization — one that would take dogs from “puppy mill” breeders like Lily’s and offer them for adoption to loving homes.

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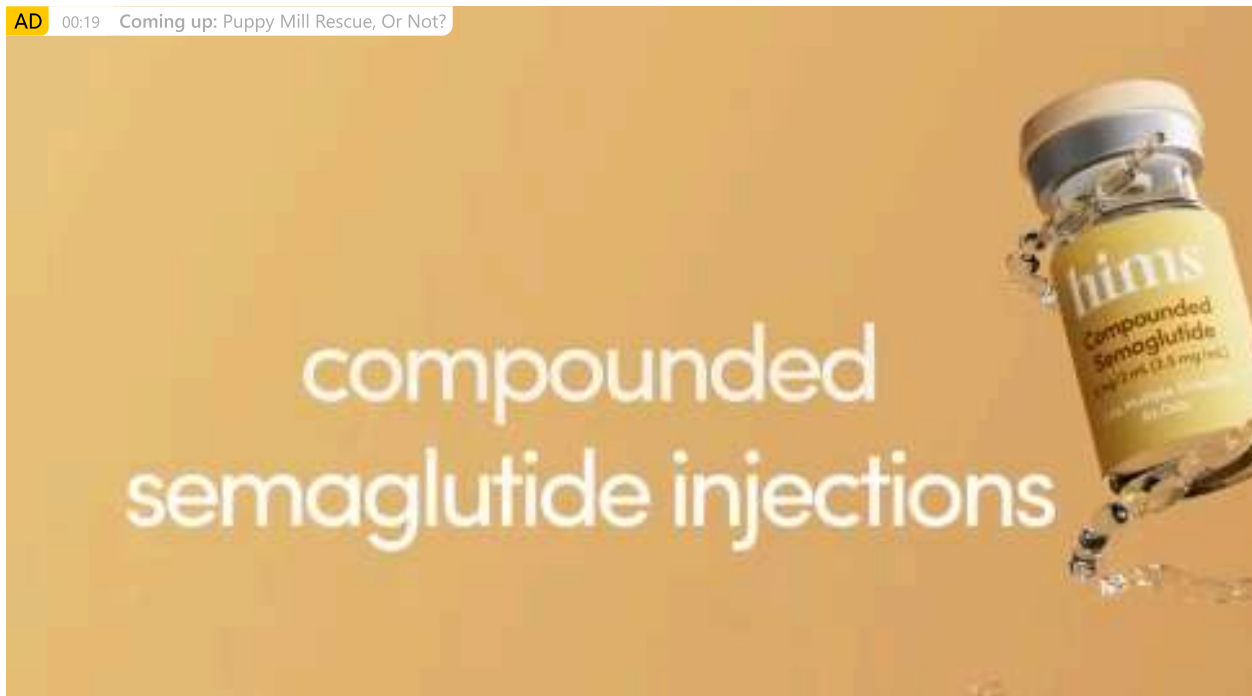


The audience cheered.

In the 12 years since she attended the Missouri auction, Strader has built a nonprofit empire. The organization she founded, National Mill Dog Rescue, now brings in nearly \$3 million a year, according to its most recent available tax return. The nonprofit has nearly [670,000 followers on Facebook](#), with another [56,000 on Instagram](#) and [25,000 on Twitter](#). National Mill’s website says it has “rescued and placed” more than 14,000 dogs as pets in homes, and it has become a regular supplier of dogs and puppies to at least a dozen other nonprofits and shelters from New York to California. Strader has been publicly lauded by everyone from the American Society for the

Prevention of Cruelty to Animals (ASPCA), which [gave her an award](#) named for its esteemed founder, to People magazine, which designated her “[a hero among us](#).” Her nonprofit has [spawned multiple copycat organizations](#), some run by former National Mill volunteers, spreading Strader’s version of the “puppy mill rescue” cause all across the United States.

It should be a story to make us all feel good. But “puppy mill rescue” as National Mill has come to embody it is not what most Americans understand “rescue” to be.

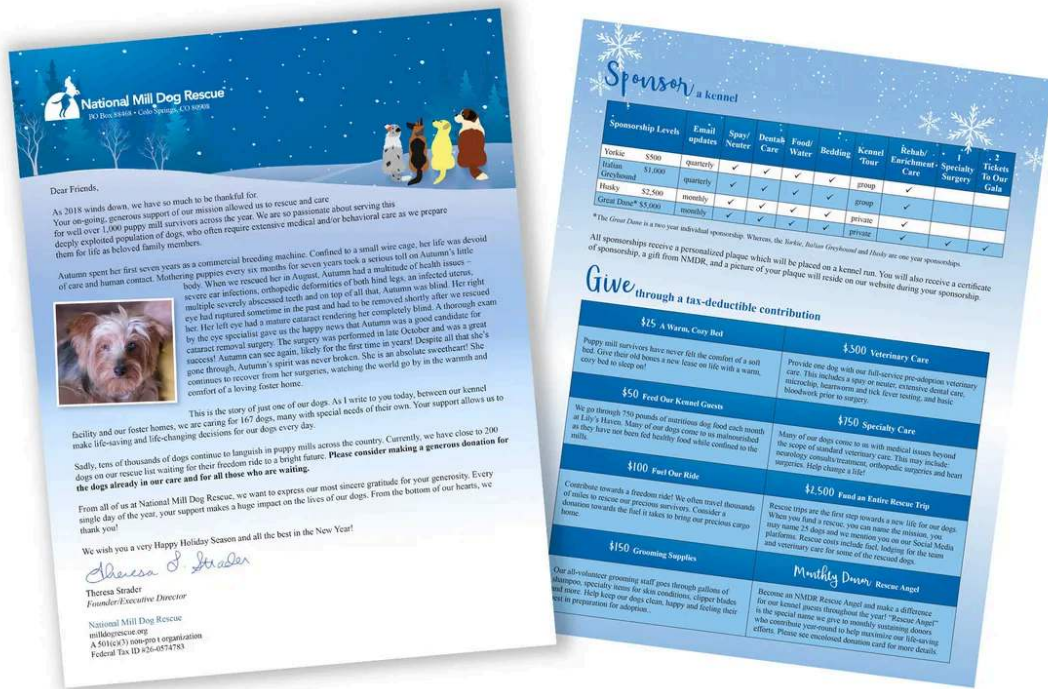


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According to experts in the dog trade, “puppy mill rescue” should encompass two basic elements — a bad breeder shutting down and

the one-time removal of dogs from that breeder. But National Mill’s business model doesn’t focus on breeding kennels that are shutting down. The nonprofit’s version of “rescue” actually helps kennels that stay in business, National Mill insiders said.

National Mill often works hand-in-glove with commercial kennels — including at least three breeders on the “Horrible Hundred” lists from the Humane Society of the United States. Behind the scenes, many of the “rescue missions” in which Strader collects dogs from breeders — promoted online with rousing music and promises that the dogs are finally free from a life of cruelty — resemble the kind of brokering that has linked kennels and retail pet stores for generations.



An example of a marketing letter from National Mill Dog Rescue.

During the past decade, the success of “puppy mill rescue” nonprofits like National Mill has dovetailed with a burgeoning nationwide campaign against “puppy mills.” Some 300 jurisdictions, including California and Maryland, have enacted pet store laws aimed at driving bad breeders out of the retail game, with versions now being debated in New York, Maine, Massachusetts, Pennsylvania, Rhode Island and Wisconsin. Celebrities like actress [Edie Falco back the “puppy mill” bans in the media](#), declaring it “an exciting time that we can actually be close to putting an end to this

cruelty.” On May 1, federal lawmakers introduced the bipartisan [Puppy Protection Act](#), targeting conditions in commercial breeding kennels. Heartrending images of dirty, shivering, frightened dogs in rusty outdoor cages are in constant rotation on TV, helping just the top welfare organizations alone to generate hundreds of millions of dollars a year in donations. Americans, who bring home an estimated 8 million pet dogs a year, are encouraged to “adopt, don’t shop.” And more people than ever are choosing shelter dogs and “puppy mill survivors” instead of buying a pooch from a breeder.

The virtue signaling around shelters and dog rescue is loud and clear.

But when it comes to “puppy mill rescue,” that’s not the whole story. National Mill has a network of suppliers, including at least 30 it has returned to more than once to collect dogs. Some of them are federally or state-regulated breeders and brokers, and some are tied to pet stores and the American Kennel Club, the country’s best-known registry of purebred dogs. National Mill takes puppies the breeders haven’t sold, along with adult dogs the breeders want to retire. Often, National Mill gets the dogs straight from the kennels; the group also has [paid to buy dogs from breeders](#) through middlemen such as dog auctioneers.

The U.S. Department of Agriculture requires a federal license for commercial brokers that buy puppies from breeders for sale to pet stores. As of early 2019, National Mill was being inspected under the same license — a regulatory acknowledgment that its operations function more like the business of brokers than the nonprofit charity of rescues and shelters.

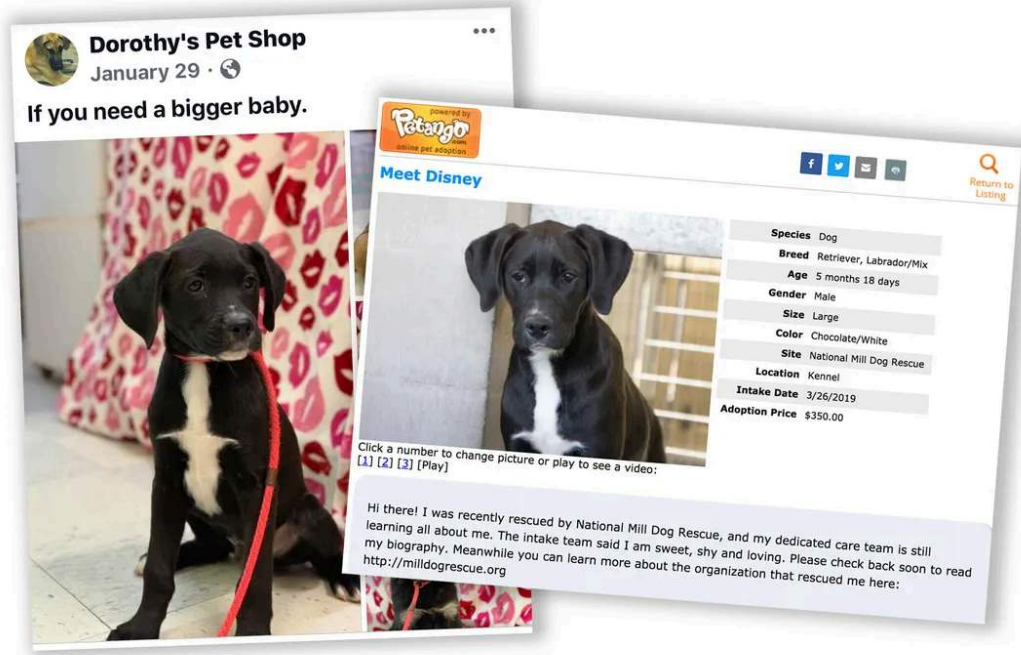
Meanwhile, marketing that looks and sounds a lot like Strader’s TEDx Talk tells the public that these “rescued” dogs are receiving proper veterinary care and basic human compassion for the first time in their lives, and that they’re being saved from a cruel and heartless industry that nobody with a shred of sanity would do anything to support.

According to documents that HuffPost obtained from inside National Mill, however, the dogs coming from breeders throughout 2017 and 2018 were far younger, and healthier, than multiple commercial breeding experts and activists suggest they would be in a “rescue” situation. Numerous former National Mill staff and volunteers said the majority of dogs have arrived at the nonprofit in pretty good shape going back more than a half-dozen years.

They're also not the kinds of overlooked pups and scruffy mutts that shelters have often encouraged people to take home. Many of the dogs that National Mill adopts out are among the most popular purebreds, including beagles, Chihuahuas, dachshunds, Siberian huskies, poodles, Shih Tzus and Yorkshire terriers, as well as some of the most desired designer cross-breeds, like goldendoodles and labradoodles. In other words, they are exactly the kind of dogs that commercial breeders are in the business of selling.

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In purely retail terms, if pet stores are the top-dollar Nordstrom or Saks Fifth Avenue of the commercial breeding industry, taking the pick of the litter from the breeders and offering those pups for sale at sky-high retail prices, then National Mill's version of "puppy mill rescue" is the TJMaxx or Marshalls, scooping up what might be damaged, imperfect or simply unsold "brand-name" product and marketing it to consumers at a lower price — like a black pup that Dorothy's Pet Shop in Junction City, Kansas, advertised on [Facebook](#) on Jan. 29. The same dog showed up in a "rescue mission" video being offloaded at National Mill on March 27, by then too old for typical pet store shoppers. He was being marketed by the name Disney, at a bargain price of \$350, as of mid-April on the National Mill website.



A black puppy named "Disney" for sale at Dorothy's Pet Shop on the left and then available through National Mill's website for \$350 on the right.

FACEBOOK/NMDR.ORG

The social media images of that dog are among many that HuffPost reviewed during a six-month investigation of National Mill. We interviewed more than 35 people, including more than a dozen current and former National Mill staffers, volunteers and directors. HuffPost also looked at National Mill's inspection reports in Colorado going back to early 2017; a slew of documents, photos and videos from inside the nonprofit; and more than 7,500 documents received through open-records requests in seven states where the nonprofit sources dogs it tells the public it's "rescuing" from breeders.

When HuffPost reached out to Strader with detailed questions, she declined to address them. "The questions and comments you have provided are so thoroughly riddled with flagrant lies, bias and inaccuracies, a response is simply not warranted. Your agenda is, and always has been, quite clear," she said via email.

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The reporting shows that questionable practices at National Mill aren't limited to marketing. Two agencies in Colorado — the state Department of Regulatory Agencies and a division of the state Department of Agriculture — have opened investigations into the nonprofit following complaints that Jene Nelson, National Mill's former marketing director-turned-whistleblower, filed with the state in early 2019. Those complaints allege that National Mill has trafficked dogs across state lines without legally required veterinary paperwork, falsified rabies certificates prior to dogs being offered for adoption or transferred to other shelters, and more than once delayed or failed to provide needed veterinary treatment.

HuffPost's reporting supports those allegations and points to a damning conclusion: that National Mill's version of "puppy mill rescue" simply normalizes another retail pipeline, with a side helping of virtue, from the commercial breeding industry to the public. Iowa's attorney general, in an action filed this past March against other rescue nonprofits, defined a similar operation as "[puppy laundering](#)" intended to sidestep the pet store bans lawmakers have been enacting.

"This is a dog-buying and distributing company that is posing as a rescue," said Cindy McKeon, who served as National Mill's facilities manager from 2011 to 2013. "It's possible that some of them [breeders] aren't being paid, but she's making room for them to breed more, and she's making a fortune by assisting these breeders."

Several of the breeders HuffPost spoke with agreed about the impact that Strader's concept of "puppy mill rescue" is having on their kennels.

"She has been a godsend to me," said Debbie Snyder of [D&D Kennels](#) in Kansas. "It's very nice."

## **Most Common Problem: Needs A Bath**

Snyder's kennel is in Clifton, Kansas, population 554. That's the type of rural area where a lot of National Mill's dogs originate, as well as



the more than 100,000 purebred puppies that end up in pet stores nationwide each year. Breeding kennels with 10, 15 or more dogs tend to be located in the American heartland in areas also known for raising cows, pigs and crops, the kinds of places that often have struggling downtowns.

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HuffPost interviewed about a dozen dog breeders in rural areas. Some said they've been driven to kill dogs in the past, because there simply weren't enough local adopters for the retired breeding adults or the puppies that were, say, born the "wrong color" for their breed or with a genetic problem that made them hard to sell. Other breeders said they've always found homes for their dogs, but doing so required a lot of time spent on marketing, which isn't their primary skill set. National Mill can reach far more potential adopters through its vast social media network and by delivering dogs to shelters such as North Shore Animal League America, a \$40 million nonprofit in the New York City area with A-list celebrity boosters that sometimes showcases dogs on radio and TV, [including "The Late Show With Stephen Colbert."](#)

"These dogs aren't being rescued. She's rehoming them," said breeder Amy Noland of [Dog Blessed Bullies](#) in Maple Hill, Kansas, population 620. "We've sent some 3- and 4-year-olds to her that have never bred. Sometimes a female just won't breed." Noland said she's also given National Mill older dogs. "Most of them, they're retired, French bulldogs, maybe 6 or 7 years old. To me, they're a lifesaver for us, to help with that."

When asked for comment, National Mill staffer Helen Freeman — who as of 2017 was listed on the nonprofit's tax returns as an officer on the board of directors — called HuffPost's questions a "witch hunt" while acknowledging that National Mill and the breeders are indeed a symbiotic entity.

“The relationship is one of, we’re grateful to them for giving the dogs a second chance, and they’re grateful for having a place to turn to and give their dogs a second chance,” Freeman said. “We’re helping them to retire their breeding dogs in a humane way.”

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Of course, describing the dogs as “retired breeders” or “too old to be a pet store puppy” doesn’t have the same fundraising cachet as “puppy mill survivors.” National Mill’s mission statement is to “rescue, rehabilitate and rehome discarded breeding dogs and to educate the general public about the cruel realities of a commercial dog breeding industry.” Its fundraising and marketing have long highlighted some of the worst-case animals it receives, who are portrayed as representative of the whole industry. The message focuses on how they’re sick, genetically deformed, psychologically and physically battered, or overbred well into their elderly years.

Current and former volunteers for National Mill told HuffPost that its messaging has been a combination of truth and exaggeration, going back to at least 2011. Several said Strader had personally instructed volunteers to promote the worst-case dogs because, as one former volunteer put it, “that’s how you get the donations, quite honestly.”

HuffPost obtained National Mill’s internal assessments of 919 dogs received from breeders from March 2017 to December 2018.

According to the volunteers who described the incoming dogs, less than 1 in 10 were sick, injured or genetically deformed, or appeared scared or terrified. Two-thirds of the dogs were described positively with words that ranged from “sweet” and “friendly” to “gives kisses,” “playful” and “outgoing.” About 1 in 5 were described as timid, shy or nervous, despite being in new surroundings and handled by unfamiliar people after a long ride in a travel crate. A few of the dogs arrived from breeders already housebroken, leash-trained, and spayed or neutered, according to the documents. One 5-year-old Shih Tzu entered the program able to give high fives on command.



According to National Mill's Animal Care Program report for the first 11 months of 2018, which covered 1,133 dogs, by far the most common "procedure" that incoming pups required before being put up for adoption was bathing. While 193 dogs were listed as needing "severe dental surgeries" and 206 dogs were sent to outside veterinarians, the nonprofit logged some 1,880 sessions in the bath (some dogs need more than one). And 352 dogs went to the in-house grooming stands for de-matting, trims, clips and fluffs.

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Nevertheless, according to unofficial minutes taken at a November 2018 meeting of National Mill's directors, the nonprofit decided to focus its year-end fundraising letter on dogs' medical needs. At the same meeting, outside veterinary bills were described as being low, at just over \$5,000. The appeal letter that went out to thousands of National Mill supporters opened with an update signed by Strader. The first paragraph reads: "Your on-going, generous support of our mission allowed us to rescue and care for well over 1,000 puppy mill survivors across the year. We are so passionate about serving this deeply exploited population of dogs, who often require extensive

medical and/or behavioral care as we prepare them for life as beloved family members.”

Freeman and Dr. Debbie St. Louis, who worked at National Mill for two and a half years as a veterinarian (and left this year), said the internal documents that HuffPost obtained didn’t necessarily reflect the true condition of the dogs. Both women said that vets may find additional problems after the initial assessments are complete, although St. Louis confirmed that volunteers do tend to note anything “really bad.”

“We put that the dog is sweet or timid or shy or gives kisses. We just rescue dogs that have probably never seen a brush or anything,” she said. “They were just unbelievably matted dogs, but they were still happy little things. We’ve had dogs that have lost every tooth in their mouth, but they’re giving you kisses. Dogs are incredibly resilient.”

Connie Bouchard, who volunteered with National Mill during its earliest days before starting her own nonprofit called [Breeder Release Adoption Service](#), said the dogs coming into nonprofit “rescues” from breeders used to be in much worse shape than they are today.

“That’s not a bad thing — these people needed to clean up their acts,” she said. “In that respect, this has been a good thing, but to continue to lead the public to believe that every single dog is a train wreck — they’re just not.”

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The data set that HuffPost obtained from inside National Mill appears to be the first to be made public about the actual health and temperament of dogs coming into nonprofit rescue from the kinds of kennels often labeled “puppy mills.” Another, larger data set about commercial breeding conditions — which has yet to be published — is being collected at Purdue University in Indiana. Candace Croney,

director of Purdue's Center for Animal Welfare Science, has spent the past four and a half years getting about 100 commercial breeders to let her team into their kennels to research standards of care on what dogs actually need, how success can be measured, and how to determine scientifically whether dogs are in good shape physically and psychologically.

Croney was not surprised by what National Mill's internal reports showed. She said the Purdue data, which is based on different breeding kennels than the ones National Mill frequents, is finding much the same thing so far.

"Now, the caveat is that we're working with breeders who open their doors to us," Croney said. "We know that we are working with a skewed population, but some of the ones who we see where there are problems — that's starting to happen because they realize we're not there to do them harm, we're really just there to measure the welfare of the dogs — we don't see many or serious health problems."

"The internet tells me that I should see dogs living in squalor, that are living in cages, that are thin from not being fed properly, that are matted in their coats, that get no dental care, that never see a veterinarian, that have wounds and injuries that are unattended," she added. "That's what I was expecting to see, and we don't see that. Of all the kennels we've been to, I can count less than a handful of places where we've seen any dogs that we have any concerns about their physical health or physical condition."

What Croney's team has seen, she said, is animals that seem fearful, especially of strangers, much as National Mill's internal reports listed 20% of dogs as shy, timid or nervous.

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### Dog Welfare Research - With Caretaker



### Dog Welfare Research - With Strangers



ABOVE:

*While “puppy mill rescuers” often look into the camera and say the dogs seem shy or fearful because they’ve lived their whole lives without meaningful human contact or have been caged and never set foot on the ground, Candace Croney’s research, in conjunction with Purdue University, shows that the dogs are sometimes simply afraid of the rescuers because the rescuers are strangers. The top video shows dogs with the breeder they know. The bottom video shows the same dogs in the same place with an unfamiliar person, such as a rescuer.*

“What’s sort of interesting is that there’s this idea that these dogs are fearful because they’re mistreated or because they’re only handled when they’re being fed and watered,” Croney said. “But what we’re seeing is that in many of these places, not only are the dogs getting regular interactions, but they’re getting positive interaction. What they’re not getting is socialization: exposing the dogs to new sights, sounds and other people. What we have found, at least in the preliminary study, is that when we test the dogs with their people, they know those folks and have a positive relationship with them. Their body language and other things tell us this. It just doesn’t manifest with other people.”

In other words, it’s possible that some dogs are showing signs of nervousness when they reach National Mill simply because they’ve

never known anything but the kennel where they were raised. The very act of “rescuing” them may be what’s making them afraid that day — which is “not a horrific welfare situation,” Croney noted.

Overall, she said, “I’m floored by what I’m seeing. I’m under no illusion that everybody operates at a high standard, or that every outcome for every dog is good. But the data is far too good from far too many of these kennels not to take a hard step back and ask: Where is the information coming from that these dogs are all coming from horrible kennels?”

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Equally noteworthy are the ages of dogs that National Mill collects from breeders. According to records HuffPost obtained documenting 942 dogs picked up between February 2017 and December 2018, most of National Mill’s “rescues” were not elderly dogs who were bred well into their senior years. Instead, 64% of the dogs were 5 or younger, 22% were 6 months or younger, and 84% were 7 or younger. Senior-age dogs, those 10 and older that could have been overbred for years past their prime, represented just 5% of the dogs taken in during that nearly two-year period, the documents show.

The “quick facts” section of National Mill’s website, as of April, said the average age of dogs it rescued was 7 years old. But the dogs collected between February 2017 and December 2018 were actually only 4.4 years old on average.



Becky Weaver, who said she volunteered with National Mill from about 2012 through 2018, saw a change over time in the ages of the dogs coming in through “rescue missions” at breeding kennels.

“You know, we get all ages now,” she said. “It used to be older dogs — 7, 8 years old and up. Now we get a lot of younger dogs, too. I’d say maybe a year and a half ago, two years ago, it changed.”

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Patrick Desjardins, who said he volunteered with National Mill for several months about four years ago, described being stunned that most of the Australian shepherds “rescued” from breeder Karey Marrs of [Mockingbird Hill Kennel](#) in Bolivar, Missouri, were in fine shape.

“I was there and helped unload them,” he recalled. “Out of the six we took off, five were fine. One was shell-shocked, but hey, he’d just spent a day and a half in a van. The vast majority of those dogs, there’s not a whole lot wrong with them at all.”



Marrs is an American Kennel Club Breeder of Merit who has produced 15 show ring champions. She said she relinquishes retired breeding dogs to National Mill when they're about 6 years old because it's easier for the nonprofit to find them homes.

"To tell you the truth, there aren't that many good rehoming services out there," Marrs said. "So, if you are kind of stuck in that situation where you have to use what's available, you know — you want your puppies or your adults to go ... to homes, and that's the most important thing. What they call us is a sales pitch to the public."

"I've told them several times they need to change their name," she added. "I don't like it. But, in that instance, you have to do what you have to do."

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## **Is It About The Dogs Or The Money?**

In summer 2013, the Black Forest fire ravaged more than 14,000 acres in Colorado and destroyed more than 500 homes, including Theresa Strader's. Because the nonprofit had been started in her home, it still had office space where National Mill business was conducted.

National Mill sought donations to help the Strader family, and the nonprofit's 2014 tax return shows a personal loan of \$57,798 to Strader and her husband, Rich, who is National Mill's treasurer — with \$32,376 still owed at the end of that year. There is no mention of the loan's repayment on the nonprofit's publicly available 2015, 2016 and 2017 tax forms.

None of the members of the 2014 board of directors who spoke to HuffPost about the personal loan could recall why, specifically, the board approved it or if the total sum was ever paid back.

Freeman, one of those board members, said she's "literally just guessing" at what happened with the nonprofit's cash five years ago: "I know that their [the Straders'] expenses were pretty severe, trying to wait for insurances and stuff like that so, um, you know, to get things going again for them and the rescue."

Chris Thornton, who was National Mill's secretary at the time of the loan and is now chairman of the board, did not respond to email or phone requests for comment. Kim Lehmann, who was on the board at the time and is now National Mill's director of kennel operations, hung up when reached by phone for comment on this and other matters.

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Jim Klever, who spent 45 years as a YMCA executive before retiring and becoming a National Mill volunteer, served for a brief period as the nonprofit's executive director. Based on what he saw when he attempted to exert financial controls at National Mill and how Strader took back power, he said the nonprofit suffers from "founder syndrome." That's when a nonprofit's founder resists change and holds onto a disproportionate share of power, leading to numerous problems as the organization grows.

"It may last a number of years, but it's surviving on the personality of the founder, as opposed to good organization with a good board of directors, financial accountability, legal systems, things like that," Klever said. "Almost without exception, small nonprofits all have issues if they're still run by founders and people are trying to exert controls."



A half-dozen past staffers and volunteers also questioned the way Strader has handled the nonprofit's "rescue mission" expenses. She increased the number of dogs collected from breeders and then transferred to other shelters, according to numerous former volunteers. Sometimes, those shelters were in resort areas such as Missouri's Lake of the Ozarks and Aspen, Colorado. Strader, they said, would take a select group of National Mill insiders, and sometimes family members, along for the doggie deliveries, paying for hotel rooms, meals and other expenses on the nonprofit's dime and making a vacation of it. The wasteful spending gnawed at their consciences, they said.

"We've eaten in fancy Italian restaurants, we've stayed in Hyatts, Marriotts — it's never the no-tell motel," McKeon, the former facilities manager, said.

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Desjardins said he was shocked by the spending he saw when Strader asked him to help deliver 30 dogs from National Mill's Colorado facility to a shelter in Phoenix. At one point on that trip,

Desjardins said he was driving down the highway with Strader and Jenny Whitt, who is now National Mill's director of adoption programs, when the subject of their hotel reservations came up. "Jenny went online and saw that somebody had complained about bedbugs, so Theresa got on the phone and canceled the reservation, and she made a reservation at the nicest hotel in Phoenix," he said. "I had my own suite — it had two rooms, a sitting room, and a bedroom — and they shared one. We went to dinner that night and probably dropped \$300 or \$400 on wine and food. It wasn't a cheap restaurant. It was filet mignons, red wine, before-dinner drinks, dessert. It was a good bill."

"What I'm used to in dog rescue is you go to Denny's and get whatever's on special," he added. "This seemed standard to them, as long as it was a certain group of closed people involved. When it's in public where all the volunteers can see, it's something else."

Not all the former volunteers who spoke to HuffPost recall extravagant spending. Some remember staying in roadside motels, grabbing hot dogs at gas stations and, on good nights, having a meal at a chain restaurant such as Olive Garden or Applebee's.

Desjardins also said he'd seen Strader use the nonprofit's imprimatur for her personal benefit when she asked him to collect an adjustable bed that she could use at home after having knee replacement surgery. Strader told him to pretend they were driving somewhere on National Mill business, he said.

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"I went over to her house, and we were getting ready to leave, and she handed me those magnetic [National Mill] stickers and said, 'Put them on the [vehicle] door. That way, it's company business,'" Desjardins said. "But it wasn't."

Weaver, the volunteer from about 2012 to 2018, said her antenna went up about how money was being spent after an incident with a cocker spaniel one Friday afternoon a couple of years ago. The dog arrived at National Mill in pain. “All she could do was squat all the time, and we didn’t know what was wrong,” Weaver said. She and other volunteers said they told Kim Lehmann that the dog needed to see a vet.

“Kim said no, it would cost too much,” Weaver recalled, noting that the nonprofit was bringing in well over a million dollars a year at that time. “The volunteers that were there, and I was one of them, I said, ‘I’ll even pay for it.’ She got very upset over it. Well, they did take the dog the next morning. She had the most horrible stones in her bladder. She was in horrible pain. She was in that pain for hours that she didn’t need to be in it.”

The incident bothered Weaver so much, she said, that she invited Strader to her home for a talk.

“I thought, when she finds out that all this is going on beneath her, she’s going to be upset,” Weaver said. “I said, ‘Is it about the dogs or is it about the money?’ She got very, very uncomfortable. She started squirming and moving around in her chair. I was expecting her to say it was about the dogs, but she said, ‘You know, all of our financial stuff is online.’ They’re making a lot — a lot — of money off this place. I didn’t like that answer, so I waited until later and asked her again, and I got the same response.”

At least five other former volunteers and employees recalled challenging Strader on money issues and getting similarly unsatisfactory answers.

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“I was pushing for financial controls of the organization, making sure the taxes were being paid, they were filing the 501(c)(3) paperwork

on time and the 990s, and I think I was probably trespassing into territory where they didn't want me to go," said Klever, the former executive director.

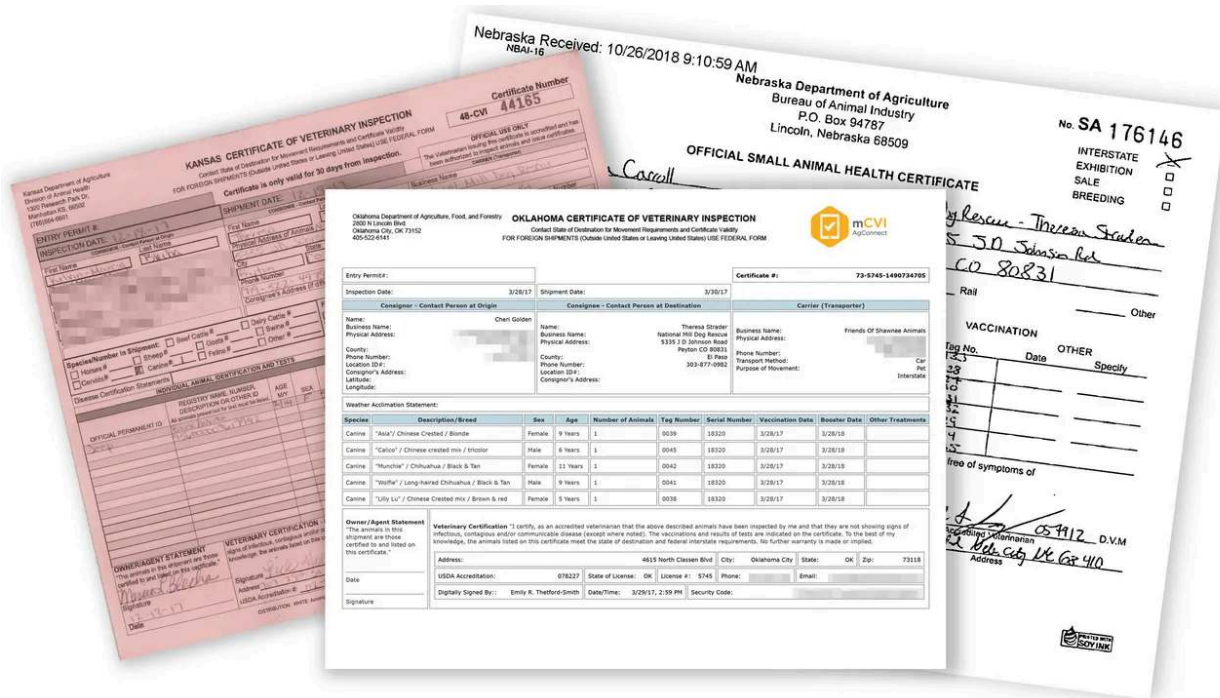
## **Acting Like A Vet**

Prior to the recently launched Colorado investigations, National Mill faced regulatory scrutiny at least once before, in March 2017. An inspector from Colorado's Pet Animal Care Facilities Act (PACFA) program cited the nonprofit for failing to comply with nine different state regulations. The violations ranged from housing intact male and female dogs together to having kennels with rusty sharp-edged panels that could injure a dog. One of the most serious "direct" violations cited National Mill for transferring 62 dogs from Kansas to Colorado without first obtaining the required certificates of veterinary inspection, or CVIs, stating that the dogs were healthy and did not pose a risk of spreading disease in Colorado.

The state thought that was a one-off mistake, according to Hollis Glenn, director of the Colorado Department of Agriculture division that oversees the PACFA program. Colorado officials "read Kansas the riot act," he said, demanding that Kansas officials never again encourage National Mill to move to Colorado dogs that didn't have veterinary certificates. In October 2017, the state considered the case closed after Strader said all the CVI-related violations had been corrected.

But according to numerous interviews and open-records requests in seven states, National Mill regularly took dogs across state lines without the required certificates. Although emails obtained by HuffPost show that Colorado's inspector took Strader's word that National Mill was following the rules on CVIs, the nonprofit was routinely doing the opposite.

The state where a dog originates and the state where it ends up are each supposed to have a CVI on file for that dog. That way, if a newly transported dog shows up with a contagious disease, state officials can trace the animal back to its place of origin and hopefully nip an outbreak in the bud.



Examples of certificates of veterinary inspection from Kansas, Oklahoma and Nebraska.

Using National Mill's internal documents to determine where its dogs were originating, HuffPost filed open-records requests for every canine that left Illinois, Iowa, Kansas, Missouri, Nebraska and Oklahoma — and was bound for Colorado — between January 2017 and December 2018. We looked through the more than 7,500 documents for any that contained the names Theresa Strader or National Mill Dog Rescue, or National Mill's address in Peyton, Colorado. There should have been about 2,000 CVIs on file: In 2017, according to state records, National Mill imported 1,032 dogs into Colorado, and in 2018, according to National Mill's year-end fundraising appeal, the nonprofit dealt with "well more than 1,000 dogs."

But HuffPost's research turned up fewer than 100 CVIs for those two years combined in the six states other than Colorado. In Colorado, there were CVIs for only 168 dogs brought in by National Mill, and

the state veterinarian's office sent them with a warning that some were probably duplicates.

The lack of CVIs, and thus the possible importation of sick dogs into the state, is a serious health and welfare concern that can lead to any nonprofit being forced to cease operations, Glenn said.

"This is a big issue for me," said the Colorado official, who noted that he cannot discuss open investigations, including the ongoing inquiry into National Mill. "If we can prove that there is imminent harm to the public, I believe that importation of sick dogs, if they're knowingly doing it, would rise to a summary suspension."

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According to National Mill's own data from the first 11 months of 2018, nearly 1 in 5 dogs that came through its facility required outside veterinary care. The complaint that Nelson, the nonprofit's former marketing director, filed with the Colorado Department of Regulatory Agencies states that National Mill imported some dogs with diseases including parvovirus and distemper, and then sometimes moved them into proximity with other dogs before resolving the veterinary issues. For instance, Nelson told the state, out of 21 dogs that arrived at National Mill in March 2018 from Arkansas, at least 11 died. She reported that some of the dogs were transferred to the Second Chance Humane Society in Ridgway, Colorado, before a diagnosis had been made. "There was no protocol in place for the staff, and frankly, no notification about the distemper issue," she wrote.

St. Louis, the veterinarian, disputed that allegation. "There's an isolation room with gowns. Only one person is treating them — we don't have the volunteers go in and feed them; there's only a few people who know what you should do," she said. "There's a sign on the door that says these dogs are quarantined. There definitely is a plan."

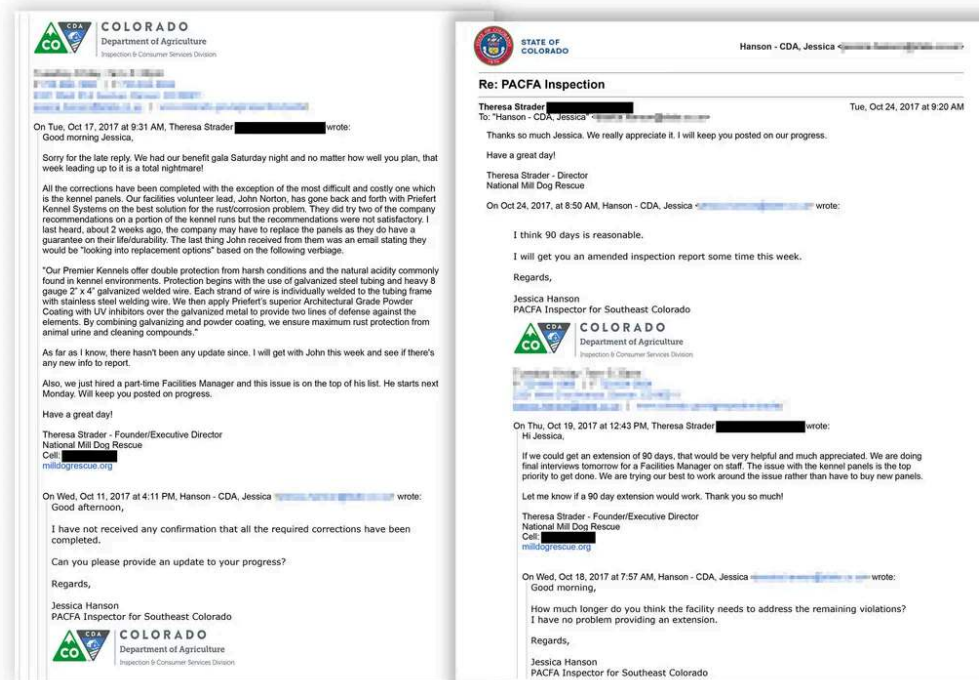


However, St. Louis and Freeman, the former board member who remains a staffer, did confirm that the nonprofit hasn't always obtained CVIs for imported dogs, including as recently as six months ago. Both women said that during the past six months — the timeframe in which Nelson's complaints were filed and HuffPost began reporting this article — National Mill started getting the required vaccinations and paperwork before bringing dogs into Colorado. "I can tell you right now that all the rescues this year have been 100% health certificates," Freeman said.

In April 2019, a federal inspection report showed National Mill in compliance with all requirements under the Animal Welfare Act.

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But this is not the first time National Mill has appeared to resolve the issue. After Colorado regulators cited the nonprofit in March 2017 for transporting dogs across state lines without CVIs, Strader told the inspector in an Oct. 17, 2017, email that "all the corrections have been completed" for documented violations.



An email exchange about certificates of veterinary inspection between Theresa Schrader and Colorado state regulators.

And HuffPost's research turned up numerous other Colorado-based nonprofits that were obtaining CVIs for the dogs they imported. It's clearly possible to do it, even for organizations with less funding and fewer staffers than National Mill.

Bouchard, the former National Mill volunteer who now runs her own nonprofit, said the breeders in Arkansas, Missouri and Kansas who give her dogs have CVIs in place from their own vets before she even arrives to pick up the pups, save for random exceptions.

"I'm not going to tell you we don't ever bring a dog into the state without a health certificate. That would be a lie," Bouchard said. "But 99% of the dogs we bring in have a health certificate."

While Colorado's PACFA program is investigating CVIs and other issues that it oversees, the Department of Regulatory Agencies is looking into a separate claim by Nelson that Strader has been practicing veterinary medicine without a license and falsifying rabies certificates. In Colorado, practicing veterinary medicine without a license is a misdemeanor on the first offense and a felony on second and subsequent offenses.

"Conservatively, hundreds of dogs have been given their rabies vaccine by Ms. Strader," Nelson wrote in her complaint to the Department of Regulatory Agencies. "Realistically, the number is in the thousands."

A person without a veterinary license giving rabies vaccines to dogs risks public health and safety — not just that of the dogs, but also of human beings, since rabies can spread from animals to people.

According to Nick Striegel, the assistant state veterinarian for Colorado, if a dog receives a rabies vaccine from someone other than a licensed vet, officials can't assume that the vaccine was properly handled or that the injection was correctly administered. "If a dog that was adopted is exposed to a rabid skunk or another animal, that dog may have to be quarantined for six months at a facility, or it could need to be euthanized," Striegel said. "If that's not recognized by public health as a certified vaccination, they do have the ability to say they are putting that dog to sleep."

Numerous former National Mill volunteers said that for years, Strader, who is a registered nurse, has been giving rabies and other vaccines to the dogs before they're adopted. Videos that HuffPost obtained from inside National Mill show Strader giving vaccines, including for rabies. Then the vaccination paperwork has routinely been filled in with the names of two licensed vets: Drs. St. Louis and Traci Duncanson.

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Duncanson did not respond to requests for comment. St. Louis told HuffPost that she never signed rabies paperwork without giving the vaccine herself, but also noted that if the dogs had to wait for their shots until a vet was available to conduct a full medical exam, “it could take weeks.” St. Louis also said the state veterinarian’s office told her it was OK for Strader to administer the vaccines under her direction. A spokesperson for the Colorado Department of Agriculture, which oversees that office, told HuffPost that it has no record or recollection of any such conversation with St. Louis.

Weaver and others said the vets routinely were not present when Strader administered the vaccines. “It’s just her,” the former volunteer said. “There might be a vet, if she happens to be working that day, over in the other building, but Theresa does all of that — and she has no veterinary degree. ... She just does what she wants to do.”

Rabies vaccinations are not the only area in which National Mill appears to have engaged in questionable medical practices. According to text messages that HuffPost obtained, National Mill staffer Christi Pate reached out to Freeman on Sept. 6, 2018, to say that a medical sheet was never created for a dog that had been spayed and was now heading home with an adopter, and that all the pain medication and antibiotics the dog was supposed to have received after the surgery were “still in her bag. She never got any of the post surgical meds.”

Freeman replied, “This has happened with a couple of other dogs.”

Pate did not respond to a request for comment. Freeman told HuffPost that she has “created medical delivery sheets to ensure medications were accurately delivered, annotated and tracked.”

## **It’s Only Wrong When Pet Stores Do It**

The business model and practices of National Mill Dog Rescue, besides raising serious questions about the whole concept of “puppy mill rescue,” show how easy it is for breeders and nonprofits to subvert the laws often described as “puppy mill bans” that have been spreading across the nation for more than a decade.

National Mill regularly transfers dogs from breeders to at least another dozen shelters and nonprofit rescues, including some in California, New York state and Phoenix, according to records HuffPost obtained. California and Phoenix are among the 300 or so jurisdictions that, since 2006, have enacted “puppy mill bans.” [New York lawmakers](#) recently introduced what could become the third statewide version of such a ban, and [Arizona state legislators](#) are taking on the issue right now, too.

“Puppy mill bans” do not, in fact, ban the breeding of puppies in mill-like facilities. Instead, they make it illegal for retail pet stores to buy puppies or older dogs from breeders. The idea, voters are told, is to choke off the “puppy mill” supply chain by forcing pet stores to shift over to what is regularly described as the “humane” alternative: sourcing dogs only from shelters and nonprofit rescues. If “puppy mills” can’t reach consumers through pet stores, lawmakers promise, then these breeding kennels will go out of business altogether.

In places where the pet sale bans have been enacted or are being debated, leading voices in the rescue community often publicly push for them — sometimes while receiving deliveries of National Mill’s “puppy mill rescue” dogs, according to the documents that HuffPost obtained. It’s always that support for the pet sale bans that the media highlights, not the fact that shelters are receiving dogs from the same sort of kennels they don’t want pet stores to rely on.

In July 2014, for example, when Phoenix’s retail pet sale ban was being challenged in court, Judith Gardner, director and CEO of the Arizona Animal Welfare League & SPCA, [told The Arizona Republic](#) that during the past year, her organization had “taken in nearly 100 castoffs from breeders the league considers puppy mills.”

Unreported was the fact that at least three deliveries of dogs came from National Mill, as Gardner acknowledged in a September 2014 deposition in a case challenging the Phoenix ban.

“The only way we’re helping the breeder is by taking their problems off of their hands. They don’t have to then kill the dogs or euthanize them; they can give them to someone and wipe their hands of it,” Gardner told HuffPost. She added that she didn’t actually know which breeders had relinquished the dogs, but that the physical and psychological condition of the dogs her shelter received from National Mill “brought everybody in this organization to tears.” She said many were older dogs, one was a frightened puppy, and one was “younger, a really beautiful male golden retriever” that could not produce puppies.

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Gardner noted that her shelter no longer receives regular drop-offs of dogs from National Mill. She also said she supports the nonprofit and its founder.

“I know, if you break the rules, it’s not a good thing, but I truly believe in Theresa’s heart,” Gardner said. “I like her and admire her so much. I truly believe she cares about what I care about, and that’s the animal itself.”

In September 2018, the senior vice president of operations at North Shore Animal League America argued for a similar pet sale ban in New York City. “We have seen firsthand the abuse and neglect these animals have endured,” Joanne Yohannan [told the New York Post](#) — which did not report that North Shore is a regular receiver of shipments from breeding kennels via National Mill. North Shore even charges adopters more for those animals: It gets [\\$100 for generic adult dogs, \\$250 for “puppy mill rescues” and \\$350 for puppies](#).

Yohannan did not respond to a request for comment.

The primary supporters of retail pet sale bans across the nation have long been the ASPCA — which honored Strader with its coveted [Henry Bergh Award](#) in 2013 and gave National Mill a \$5,500 grant

the next year — and the Humane Society of the United States, which featured Strader in its [Animal Sheltering](#) magazine in 2013 and gave National Mill a \$2,500 grant two years later.

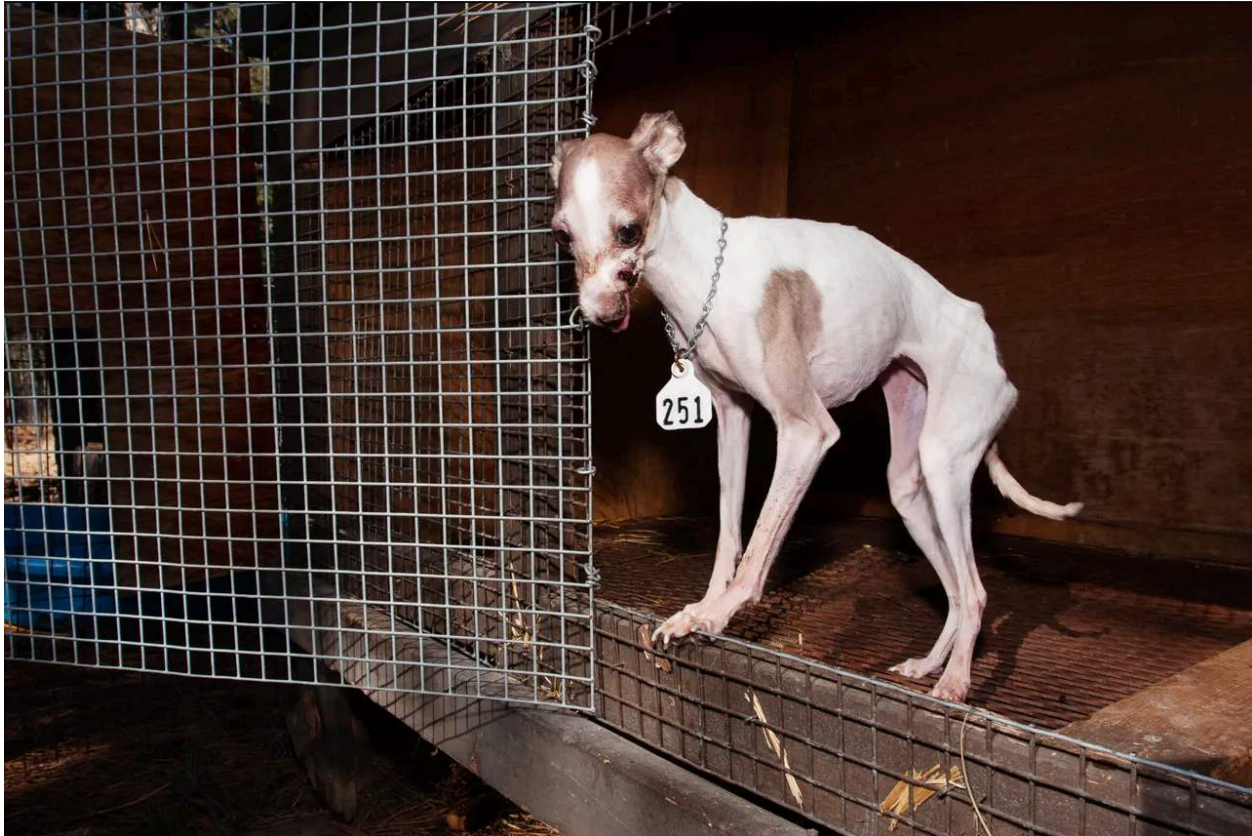
When HuffPost sent detailed questions about National Mill to the ASPCA's CEO, who has been quoted saying that pet sale bans break the “puppy mill supply chain,” the organization responded with a general statement about “the cruel practices inherent” in commercial dog breeding. The ASPCA reiterated its support for “rescues and shelters committed to rehabilitating and rehoming animals churned out by the commercial dog breeding industry.”

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Also after receiving detailed information about HuffPost's reporting, John Goodwin, senior director of the Humane Society's Stop Puppy Mills Campaign, simply stated, “As many as 50,000 commercially raised puppies are shipped to New York pet stores each year, and any legislation that stems that flow is going to be helpful in reducing the number of puppy mill dogs sold to unsuspecting New York families.”

The Pet Industry Joint Advisory Council lobbies against the pet sale bans that the ASPCA and Humane Society support. Mike Bober, president and CEO of the council, called National Mill a frustrating example of the “underground market” for commercially bred puppies that his organization has argued would result from such bans.

“Cases like this make it clear that banning the sale of dogs in pet stores is not a solution to concerns about commercial breeding,” Bober said in a statement to HuffPost.



A photo of Lilly, the dog that Strader highlighted in her TEDx Talk, with the allegedly custom-ordered auction tag.

## **And About That Dog Lily ...**

On National Mill's Facebook page and elsewhere online, donors and adopters can still see those heartbreaking photos of Lily that Strader showed at her TEDx Talk when she described buying the dog at auction. A ray of sunlight pierces through one image of the Italian greyhound as if to symbolize hope entering the cage.

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The photos were “totally staged,” said a former volunteer, one of three who said the same thing. Strader and Clay Myers, a prominent animal welfare photographer who did not respond to requests for comment, took them in Strader’s backyard — more than a year after she brought Lily home.

Strader, the former volunteers said, custom-ordered the No. 251 auction tag to look authentic for the marketing campaign.

*Kim Kavin’s most recent book is “[The Dog Merchants: Inside the Big Business of Breeders, Pet Stores, and Rescuers](#),” which won two national awards. In May, she was awarded the 2019 Donald Robinson Prize for Investigative Journalism, for [this article about dog auctions](#) in The Washington Post. She lives in New Jersey with her two adopted shelter mutts.*

*Top illustration: Damon Dahlen/HuffPost; Photos: Getty. Video: Kiara Alfonseca/HuffPost. Infographics: Heather Jones for HuffPost.*

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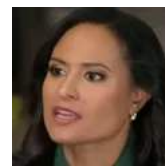
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