

From: [Elizabeth Jones](#)
To: [Trisha Linebarger](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Tuesday, June 23, 2020 11:23:10 AM

From: sunset@sunset.texas.gov On Behalf Of Texas Sunset Commission
Sent: Tuesday, June 23, 2020 11:22:22 AM (UTC-06:00) Central Time (US & Canada)
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS DEPARTMENT LICENSING AND REGULATION

First Name: Natalie

Last Name: Lynch

Title: Attorney

Organization you are affiliated with:

Email:

City: Austin

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

While the situations reported in the Sunset Advisory Commission Staff report are factually accurate, the conclusions wholly omit that the program was internally self-sabotaged to reach this result against the will of the people of Texas.

With regards to the Licensed Breeder Program, the administration did not hold meetings according to the law, violated open records rules, and did not hold staff to quality standards required in all other programs. In this way, TDLR violated its own rules to fight against the desires of the people of Texas.

That intentionally-fabricated scenario created exactly the dynamic that leads staff to be able to misconstrue facts in its recent report. For example, the report cites the long investigative times and low revenues; however, it fails to note that adhering to minimal investigative conclusion standards is exactly the reason few breeders pay registration or penalties that were intended to fund the program. In another example, the report compares our rules to Oklahoma's; however, it fails to note that other states have much more appropriate breeding requirements and puppy lemon laws.

Any Alternative or New Recommendations on This Agency:

The breeding act was passed because the people of Texas wanted to pass the burden of poor breeding practices to the breeders and mandate minimum humane standards. After that, TDLR created administrative rules that undermined the will of the people, generally ignored the program contrary to the law, and manufactured poor numbers so that erroneous conclusions about our state's welfare could be reported.

Rather than eliminate this program, the rules should be made appropriate and identified loopholes closed so that the desires of Texans can be fulfilled.

My Comment Will Be Made Public: I agree