

**Greetings, my name is Suzi Clark, I am founding member of the National Walking Horse Association. An association that show and exhibit the natural ability of the Tennessee walking horse under full compliance of the Federal Horse Protection Act. I have owned and shown Tennessee Walking Horses for 20 years and have witnessed the abuse and torture that have been inflicted upon these horses. I am here today to have a voice for the horse. I have asked myself during the years why does this abuse still exist. It became clear to me in the past year that after 42 years of cruelty and abuse the USDA has failed in its congressional charge to eliminate soring.**

**Congress passed the Horse Protection Act in 1970 to eliminate the cruel and inhumane practice of soring horses. How close are we to achieving the goal?**

**The USDA has only put a dent in this “Out of Control, Wreck less Vehicle”. In the driver’s seat are the violators. The violators show complete disregard for the law and the belief it is their cultural right to behave in this manner. The VMO field inspectors function as street patrol officers that have lost the chase. Worthless citations, letters of warning, and threats of licensure removal no longer slows the violators down. In the rear view mirror you see the many victims lying in the road who have tried, “TO DO RIGHT BY THE HORSE”. Attached to the bumper is the high stepping, chained, sored show horse helpless in the path that has been chosen for him. At the end of the road is the show ring. The violators have surpassed every obstacle in their path and have made it to the ring no matter the condition of the horse. All of this for a 50c blue ribbon and a 20 second victory pass that provides a false sense of prestige.**

**The industry will claim a 98% compliance rate. That is a lie. These percentages are tabulated by outlaw HIO's. They further dilute the numbers with entries instead of horses and include all sound horse shows and versatility shows. They fail to mention the number of people that exit show grounds when the USDA arrives. Look at the results of the recently released 2010 and 2011 gas chromatography mass spectrometry results. The percentage of violations is on the rise.**

*2010 Celebration:*

*Of 302 total samples, 261 (86.4%) positive for foreign substance, and 106 (35.1%) positive for –caines*

*2010 Trainers Show:*

*Of 20 total samples, 18 (90%) positive for foreign substance, and 8 (40%) positive for –caines*

*2011 Celebration:*

*Of 52 total samples, 52 (100%) positive for foreign substance, and 37 (71.2%) positive for –caines*

*2011 Trainers Show:*

*Of 13 total samples, 12 (92%) positive for foreign substance, and 7 (54%) positive for –caines*

*2011 Fun Show:*

*Of 20 total samples, 19 (95%) positive for foreign substance, and 12 (60%) positive for –caines*

**Seems that 98% compliance rate is blown out of the water.**

**Mary Irby, the president of TWHBEA claims the industry would decimate if the minimum penalty protocol was put into effect. If the industry has a 98.5% compliance and penalties only affect violators explain to me how 2.5% of violators would decimate the industry.**

**Can the industry achieve a consensus on how to carry out a self-regulatory program to enforce the Horse Protection Act in a consistent way?**

**NO. The USDA is asking for consensus from an industry consisting of two groups. One side only concern is to make-sure the sored high-stepping chained show horse remains in the ring no matter the cost. This side is the most corrupt, evil, lying, cheating, law breaking, abusive association I have ever known. Its purpose is to protect the animal abusers. The other side is the**

sound horse associations who have successfully eliminated the sore horse from the ring. They provide a sound loving place to exhibit the natural talents of the TWH. They are made of a core group of people who “Do Right By the Horse.” Unfortunately these associations are the minority in the industry. As a sound horse supporter of these organizations I will never find common ground with the other side. The USDA must forget the notion that this is a “single” industry that must reach a consensus. The industry does not need the USDA to be a mediator. This mediator role has been devastating for our horse and the sound horse industry. Sound HIOs are the only groups that should be involved in a consensus.

**What responsibilities should USDA-certified Horse Industry Organizations (HIOs) have within the industry ?**

**There are three USDA certified HIO’s in the Industry. FOSH, NWAHA, and IWAHA. They have implemented the mandatory minimum penalty protocol to protect the horse and make trainers/owners responsible for their actions. They have been successful in providing a sound safe place to enjoy the natural talents of the TWH. They are responsible in protecting the horse. Their success is accomplished by a core group of individuals doing, “Right by the horse,” They prohibit any violators from decision making decisions and developed an honest inspection program.**

**How can the industry reconcile its inherent competition aspect with ensuring compliance with the Horse Protection Act?**

**The violators run the industry. They include the leaders, judges, trainers, and inspectors. By enforcing the law and removing these individuals from competition. Soring is cheating. Cheaters must receive quick meaningful penalties. The USEF requires compliance with its rules. Cheaters do**

**not return year after year. The USDA must implement lifetime suspensions and criminal prosecutions for repeat offenders.**

**What can USDA do now (and in the future) to ensure compliance?**

**Decertify the noncompliant HIO's. Prosecute criminal cases quickly and efficiently. Eliminate meaningless letters of warnings.**

**What responsibilities should USDA have within the industry with respect to enforcement and what hinders oversight of the HIOs and/or industry?**

**The USDA should forget the notion these violators/criminals can be regulated. Stop trying to regulate these people and start prosecuting. You have the power to do it. Decertify these outlaw HIO's.**

**Should there be a prohibition of all action devices?**

**Yes. Eliminate all action devices. Dr. Molly Nicodemus at MSU showed there is less than 5% difference in stride unless the action device weighs more 10 oz. or more. A stride difference of less than 5% is not perceptible to the human eye. With the action devices having no impact on the gait and stride of a sound horse and only having impact on sore horses, the action devices must be eliminated. Chains are action devices utilized by applying a chemical irritant like mustard oil, diesel fuel, or kerosene. The legs are marinated with plastic wrap for several days to maximize the caustic effect. Then**

**metal chains are fastened to these painful areas. When the chains bang against these areas you have the extreme artificial high stepping sore horse.**

### **Should there be a prohibition on pads?**

**Yes. Statics were analyzed from three years data from the 2008, 2009, and 2010 where USDA VMO's inspected horse shows. The data showed that 90% of all HPA violations are from the performance horse division.**

### **Currently the Horse Protection Regulations have a shoe weight limit of shoes for all ages?**

The USDA must address pads and tungsten shoes allowed in the show ring. Pads and Tungsten shoes can weigh over eight pounds per shoe. The pads and tungsten shoes can rip the hoof off a horse. A horse does not have the structure to carry 8 pound shoes. At the time the HPA was enacted, no one realized that current soring practices would involve the evolution of gigantic stacks and 8 pound shoes giving way to a biomechanical soreness in horses. Soring practices have also evolved. The trainers have moved to the sole of the foot in order to avoid detection via palpation. Start pulling pads and shoes.

**In closing, I am of the strong opinion that these meetings are a waste of the USDA's and taxpayer's resources. The short notice provided to stakeholders, the limit of 5 minutes per speaker and the forced questions indicate the USDA's**

**complete failure in understanding the Tennessee Walking Horse industry or the USDA's own role in perpetuating horse soring 40 years.:**