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UNITED STATES DEPARTMENT OF AGRICULTURE

BEFORE THE SECRETARY OF AGRICULTURE

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In re:

Vana M. Mayo, a/k/a  
Vana M. Stark,

Respondent.

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AWA Docket No. 11-0408

Complaint

There is reason to believe that the respondent named herein has willfully violated the Animal Welfare Act, as amended (7 U.S.C. §§ 2131-2159), herein referred to as the Act, and the regulations and standards (9 C.F.R. §§ 1.1-4.11) issued pursuant to the Act, and, therefore, the Administrator of the Animal and Plant Health Inspection Service (APHIS) issues this complaint alleging the following:

I

A. Vana M. Mayo, also known as Vana M. Stark, hereinafter referred to as respondent, is an individual whose mailing address is 417 S. Lincoln Avenue, Anthony, Kansas 67003.

B. The respondent, at all times material hereto, was not licensed under the Act and the regulations.

## II

A. On or about June 24, 2009, the respondent operated or intended to operate as a dealer as defined in the Act and the regulations, without being licensed, in willful violation of section 4 of the Act (7 U.S.C. § 2134) and subsection 2.1(a)(1) of the regulations (9 C.F.R. § 2.1(a)(1)). Respondent acted as a dealer by negotiating the sale of eighteen (18) puppies of various breeds to a USDA licensed dealer.

## III

WHEREFORE, it is hereby ordered that for the purpose of determining whether the respondent has in fact willfully violated the Act and the regulations and standards issued under the Act, this complaint shall be served upon the respondent. The respondent shall file an answer with the Hearing Clerk, United States Department of Agriculture, Washington, D.C. 20250-9200, in accordance with the Rules of Practice governing proceedings under the Act (7 C.F.R. §§ 1.130-162.13). Failure to file an answer shall constitute an admission of all the material allegations of this complaint.

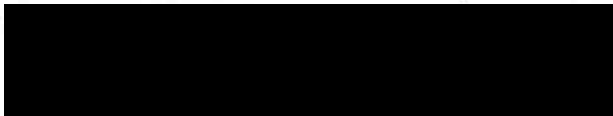
APHIS requests:

1. That unless the respondent fails to file an answer within the time allowed therefor, or files an answer admitting all the material allegations of this complaint, this proceeding be set for oral hearing in conformity with the Rules of Practice governing proceedings under the Act; and
2. That such order or orders be issued as are authorized by the Act and warranted under the circumstances, including an order:

- (a) Requiring the respondent to cease and desist from violating the Act and the regulations and standards issued thereunder;
- (b) Assessing civil penalties against the respondent in accordance with section 19 of the Act (7 U.S.C. § 2149); and
- (c) Permanently disqualifying the respondent from becoming licensed under the Act and regulations.

Done at Washington, D.C.

this 12<sup>th</sup> day of September, 2011

  
*Acting* Administrator,  
Animal and Plant Health Inspection Service

Buren W. Kidd  
Attorney for Complainant  
Office of the General Counsel  
United States Department of Agriculture  
Washington, D.C. 20250-1400  
Telephone (202) 720-2633