



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
1416 Ninth Street
Sacramento, CA 95814
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



June 20, 2014

Ms. Mary Cummins
Animal Advocates
645 W 9th St. #110-140
Los Angeles, CA 90015

**SUBJECT: WILDLIFE REHABILITATION PERMIT/MOU RENEWAL AND
WARNING NOTICE OF VIOLATIONS**

Dear Ms. Cummins:

This letter is to advise you that the Department of Fish and Wildlife (Department) is renewing Animal Advocates' Wildlife Rehabilitation Permit/Memorandum of Understanding ("MOU"), and at the same time, providing you notice that you do risk revocation of the Permit/MOU due to violations as described in the following.

We apologize for the length of time it has taken to notify you, however, the circumstances described below, necessitated a thorough review by the Department.

The Department has identified several violations of the Fish and Game Code, the California Code of Regulations, Title 14 (Title 14), Section 679 (Section 679), and the MOU accompanying Animal Advocates' Wildlife Rehabilitation Permit¹ committed by Animal Advocates. Because of the violations described below, and violations described in previous warning letters issued on March 3, 2007 and March 28, 2013 ("Warning Letters"; Exhibit 1), **the Department will revoke the Permit/MOU if Animal Advocates commits any additional violation of Section 679, the MOU, or the Minimum Standards for Wildlife Rehabilitation, 2000, Third Edition (Minimum Standards).**

VIOLATIONS

Since the last renewal of the Permit/MOU on February 17, 2011, the Department has discovered the following violations committed by Animal Advocates:

1. On April 20, 2014, Animal Advocates posted a photo on Animal Advocates' Facebook page showing a domesticated rabbit with a non-releasable striped skunk in a cage inside a home. (Exhibit 2.) MOU Condition 14(j) states:

¹ Hereinafter, the Permit and MOU will be called "Permit/MOU."

Any photographs of educational wildlife on brochures or websites, etc. cannot portray the animals as "pet-like"; inside homes, playing with toys, displayed with domestics, eating unnatural foods, etc.

This incident violated MOU Condition 14(j), because Animal Advocates showed the skunk in a pet-like situation with a domesticated rabbit inside a home. Animal Advocates was previously warned not to display wild animals in pet-like situations in the March 3, 2007 warning letter from the Department.

2. On or about April 20, 2014, Animal Advocates placed a domesticated rabbit next to a non-releasable striped skunk in a cage. (Exhibit 2.) MOU Condition 14(d) states:

All non-releasable wildlife shall be maintained in accordance with the caging and care provisions listed in sections 671.2 and 671.3, Title 14, CCR unless otherwise authorized by the Department.

Title 14, Section 671.3 ("Section 671.3"), subdivision (a)(3) states:

Common walls between noncompatible animals shall be constructed so that animals cannot gain access to each other.

Because Animal Advocates did not provide walls between non-compatible (incompatible) animals, Animal Advocates violated MOU Condition 14(d).

3. On or about April 20, 2014, Animal Advocates housed a non-releasable striped skunk in an inadequate cage that appears to consist of a tile floor with walls approximately 3 feet tall, and less than 30 square feet of floor space (Exhibit 2.) Section 671.3, subdivision (a)(10) (which partly addresses caging standards for striped skunk) states in part:

Striped Skunk	
30 [square ft. floor space]	6 [ft. outside fence height]

Section 671.3, subdivision (b)(2)(K)(2)(a)(iii) (which partly addresses caging standards for striped skunk) states:

The floor of the cage shall be constructed of one inch square or one inch by two inch mesh, 4-inch concrete, wood, 11 gauge non-rusting chain link or equivalent material with a covering of dirt or similar natural substrate.

This incident violated MOU Condition 14(d), because Animal Advocates did not provide an enclosure for the skunk that had walls 6 feet high, with 30 square feet of floor space, and a floor consisting of one inch by two inch mesh, 4-inch concrete, wood, 11 gauge non-rusting chain link or equivalent material with a covering of dirt or similar natural substrate.

4. On January 31, 2014, Animal Advocates submitted an annual report for 2013 that lists a fox tree squirrel with no eyes and a striped skunk that contains false information. Specifically, both animals were acquired in 2004: not 2003, as listed in the annual report. Furthermore, according to an e-mail sent from you on March 10, 2007, the fox tree squirrel with no eyes had died. Fish and Game Code, section 1054 (Section 1054), subdivision (a) states:

It is unlawful to submit, or conspire to submit, any false, inaccurate, or otherwise misleading information on any application or other document offered or otherwise presented to the department for any purpose, including, but not limited to, obtaining a license, tag, permit, or other privilege or entitlement pursuant to this code or regulations adopted thereto.

MOU Conditions 15 states:

The Permittee shall be responsible for providing the Department with an annual report that is due by January 30th of each year. If annual reports are not submitted by January 30th of each year, this MOU will automatically expire. The annual report shall contain the following information listed below:

- a. A complete list of all wildlife received by the Permittee during the reporting period. The report shall include a statistical summary of all the "required information" as stated in the minimum standards for Wildlife Rehabilitators, Third Edition, 2000.
- b. A complete inventory of all non-releasable wildlife (this condition is not applicable to rehabilitation organizations possessing educational wildlife pursuant to the Exhibitor's MOU issued by the Department). The inventory shall include
 1. All deletions and additions to the previous year's inventory of non-releasable wildlife.
 2. A description of each animal's impairment which makes it non-releasable.
 3. The name of the veterinarian and the Department employee who classified the animal as non-

releasable.

4. The date the animal was classified non-releasable.

This incident violated Section 1054, subdivision (a), and MOU Conditions 15(b)(1) and 15(b)(4), because Animal Advocates submitted an annual report with false and incomplete information.

5. On January 25, 2013, in its 2012 Annual Report, Animal Advocates did not provide required information for four animals kept for exhibiting purposes, specifically, information regarding when the animals were acquired, the nature of their injuries, and the location of the animals, but instead wrote "SAME." The Department sent you a warning letter regarding this violation on March 28, 2013. Animal Advocates did not submit a completed annual report until May 28, 2013. This incident violated MOU Conditions 15(b)(2) and 15(b)(4), because Animal Advocates initially submitted an incomplete annual report.

6. On or about January 5, 2011 through on or about April 20, 2013, Animal Advocates kept a non-releasable raccoon at a satellite facility operated by a volunteer named Mary Ellen Shoeman instead of sending it to a zoo or nature center with a static display as directed by the Department. Section 679, subdivision (f)(4) states in part:

Rehabilitated wildlife may be released back into the wild only as directed by the department. The department may provide bands and tags for rehabilitated wildlife when deemed necessary by the department. If any animal cannot be released, it shall be transferred to a zoological garden, museum, college, university or other educational/research institution or wildlife exhibitor.

MOU Condition 2 states:

Native or non-native wild animals, prohibited by Section 671, Title 14, CCR, MAY NOT be possessed by the Permittee unless otherwise provided for in this Memorandum (see conditions 4, 7, and Appendix A).

MOU Condition 14 states:

The Permittee is not authorized to possess non-releasable wildlife for educational or surrogate unless the animal is approved by the Departments' Wildlife Rehabilitation Coordinator or a officer of the Department. Non-releasable birds require permission for the USFWS.

MOU Condition 26 states:

Permittees may not retain any animal obtained under this permit for more than 180 days without additional authorization from the Department's Wildlife Rehabilitation Coordinator.

This incident violated Section 679, subdivision (f)(4), and MOU Conditions 2, 14, and 26, because Animal Advocates did not send the raccoon to a zoo or nature center as directed by the Department, but instead, kept the raccoon without Department authorization in excess of 180 days. Animal Advocates was previously warned not to keep wild animals without Department authorization in the March 3, 2007 letter from the Department.

7. On April 15, 2011 and September 18, 2011, Ms. Shoeman posted videos titled "Harbor Greeting" and "Singing with Harbor" on the website "YouTube" depicting the raccoon described in Violation #6 in various pet-like situations. Harbor was the name of the raccoon. Specifically, "Harbor Greeting" shows Ms. Shoeman cuddling with the raccoon and allowing it to lick her lips and mouth, and "Singing with Harbor" shows Ms. Shoeman singing to the raccoon while allowing it to grasp her hands and arms.

MOU Condition 14(i) states:

In a continuing effort to maintain dignity to wildlife, educators shall not display techniques that promote a "pet" type of relationship between the handler and the animal (i.e., refer to the animals using terms like Cute or allow the animals to crawl or climb on the handler or in the clothing or pockets of the handler).

This incident violated MOU Conditions 14(i) and 14(j), because Animal Advocates publicly displayed the raccoon in pet-like situations. Animal Advocates was previously warned not to display wild animals in pet-like situations in the March 3, 2007 letter from the Department.

8. On or about April 20, 2013, Ms. Shoeman disposed of the raccoon described in Violations #6 and #7 by sending it to an unspecified person identified as being part of the "Raccoon Underground Railroad," without consulting the Department. MOU Condition 13 states:

The permittee may transfer any wildlife, except fully protected, threatened or endangered animals, which cannot be released into the wild because of permanent injury (or red foxes) to a bona fide public zoological garden, museum, college, universities, or other educational or scientific institution as determined by the Department. Records of such transfers will be maintained and be available for inspection. If wildlife cannot be released or transferred, it shall be humanely euthanized.

This incident violated MOU Condition 13, because Animal Advocates did not transfer the raccoon to a bona fide public zoological garden, museum, college, university, or other educational or scientific institution as determined by the Department.

9. In or around 2011 or 2012, you posed for a photo with a wild juvenile opossum inside your shirt. (Exhibit 3.)

Section 679, subdivision (f)(3) states:

Wildlife temporarily held for rehabilitation must be mainly public. Such wildlife shall have minimal direct human contact. Every effort shall be made to prevent imprinting.

This incident violated Section 679, subdivision (f)(3), because Animal Advocates allowed unnecessary human contact with a wild opossum, and did not take every effort to avoid imprinting it. Animal Advocates was previously warned to avoid unnecessary human contact with wildlife in the March 3, 2007 letter from the Department.

Animal Advocates has violated several provisions of Section 679 and the MOU, including provisions that it had previously violated. While the Department has reservations about renewing Animal Advocates' Permit/MOU, it is doing so with the hope that Animal Advocates will learn from its mistakes and rehabilitate wildlife in accordance with all applicable laws and the Permit/MOU. However, as noted above, the Department will immediately permanently revoke Animal Advocates' Permit/MOU if any additional violation of Section 679, the MOU, or the Minimum Standards occurs.

If you have any questions, please contact me at the above address or by e-mail at Eric.Loft@wildlife.ca.gov.

Sincerely,



Eric Loft, Chief, Wildlife Branch

Cc: Sonke Mastrup

Executive Director
Fish and Game Commission

Department Exhibit 1



March 3, 2007

Animal Advocates
Mary Cummins
359 Swetzer Ave.
Los Angeles, CA 90048

Dear Ms. Cummins,

As a wildlife rehabilitation permittee you are required to abide by all laws that pertain to wildlife rehabilitation. Upon signing the Wildlife Rehabilitation Memorandum of Understanding (MOU), you agreed to comply to all of the conditions in the MOU and with the provisions of California Code of Regulations, Title 14 (CCR T-14); Section 679.

This letter is being written to document "incidents of concern" that the Department believes violate CCR T-14 Section 679 and the Wildlife Rehabilitation Memorandum of Understanding with Animal Advocates.

1. The Department received a video of an event called "Best Friends" held on March 5, 2005, at Johnny Carson Park. At a booth under a banner labeled "Animal Advocates", a very small juvenile opossum is seen being handed to a volunteer for Animal Advocates, from a person who appears to be a member of the public. In the video, the Animal Advocates volunteer continues to pet and display the juvenile opossum to the public. Displaying animals undergoing rehabilitation to the public is inconsistent with, and a direct violation of your wildlife rehabilitation MOU # 12 which states: *The permittee shall not display or exhibit any native injured or diseased wild animal which is possessed for care or treatment under the authority of this Memorandum, nor shall the permittee allow any other person to do so.* In addition, the public should not be allowed to handle wildlife (either educational animals or wildlife undergoing rehabilitation). The video was viewed from the following web site:
<http://www.doggtv.com/wildliferescue.htm>

2. Inappropriate pictures of wildlife held in your care have been displayed on your Animal Advocates website. One picture titled "Noodle 2" showed a juvenile squirrel, not confined to a cage, with human baby toys in the background and eating what appeared to be pasta. The baby toys in the background coupled with the fact that the animal is shown inside a residence without caging could easily be perceived as a pet by the general public and is again inconsistent with the intent of wildlife rehabilitation. Another picture titled "Patchy and Booger" shows a domestic cat interacting with an unconfined skunk in a residence. This skunk would likely be perceived as a pet to anyone looking at this photo. Another photo shows a domestic cat standing next to a very small skunk. All of these photographs are not suitable for a rehabilitation website and do not promote education or dignity to wildlife, they promote these animals as pets.

Two conditions of the Wildlife Rehabilitation MOU pertain to the presentation of wildlife. Number 13(j) states: *In a continuing effort to maintain dignity to wildlife, educators shall not use display techniques that promote a "pet" type of relationship between the handler and the animal.* Also # 19-*Wildlife temporarily held for rehabilitation must be maintained*

separate from facilities housing domestic animals. This means that wildlife held under a wildlife rehabilitation permit shall not be exposed to domestic animals.

3. Educational animals must be approved through the Department. On your 2005 Annual Year End Report you reported having four educational animals that the Department has no record of approving. You later stated that you interpreted the MOU as permitting you to have 10 educational animals. This letter serves as a reminder that you must have approval to keep any animal for educational purposes. An approval is needed for each individual animal at the time it is recognized that the animal is non-releasable. The documentation of the squirrel with "no-eyeballs" is of great concern and the quality of life for that squirrel is questionable at best. Number 13 in your current wildlife rehabilitation MOU states:

The permittee is authorized to possess approved non-releasable wildlife for education or surrogate purposes under the following conditions: Only wildlife determined to be permanently injured and suitable for public exhibition will be considered for non-releasable status. That determination shall be made by the Department or a veterinarian representing a Department-approved wildlife rehabilitation organization. The veterinarian shall prepare a written document describing the permanent injury that qualifies the animal as non-releasable. A copy of the veterinarian's document shall be forwarded to the Department within 30 days of the veterinarian's classification.

In the unusual event that an animal is brought into a center imprinted, the Department shall be notified within 72 hours after the Permittee determines the animal is imprinted. If an animal becomes imprinted during the rehabilitation process, the animal shall be either transferred to another rehabilitation (other than the responsible rehabilitator) center to be used as a education animal, authorized or transferred to a Department-approved wildlife exhibitor or Live Native Specimen Permittee.

4. On December 7, 2006 you confirmed, via email that you have a satellite named "Dayna" who was identified through a "My Space" website <http://www.myspace.com/dayna2626>. Dayna is in violation of the Animal Advocates' MOU for inappropriate actions/pictures of wildlife undergoing rehabilitation. The photos depict a fox squirrel being choked, a fox squirrel in a public area on several peoples' heads and shoulders, a juvenile raccoon chewing on the lead of a pencil, and a fox squirrel wearing a t-shirt. This "My Space" site is unprofessional and inappropriate and depicts these animals in a pet like setting. As a permittee, you are directly responsible for the animals being held under your permit and therefore responsible for your satellites actions.

5. On or around August 30, 2006, you were contacted regarding the location of a bobcat kitten you had acquired. You failed to provide this information until, on a third attempt, when specifically asked if Anna Dresdon was in possession of the bobcat. It appeared as though you would not cooperate with the disclosure of the bobcat's location until you believed the location was already known by the Department. This non-cooperative attitude is of great concern to the Department and violates California Code of Regulations T-14 Section 673(f)(7) *the operator of a wildlife rehabilitation facility shall make all records, wildlife being rehabilitated and any materials used for confinement, treatment, of care of wildlife, available for inspection by Department employees or employees of the Department of Food and Agriculture or the Department of Health services or any other person authorized to enforce these regulations.*

The Department, as the authorizing agency, may revoke wildlife rehabilitation MOU's for cause. The Department of Fish and Game has a signed copy of your MOU. Upon signing the MOU, you the permittee, agreed to comply to all of the conditions in the MOU and with the provisions of the California Code of Regulations, Title 14, Section 679. The MOU also states that the MOU may be revoked upon the finding by the Department that the permittee, or any representative, has not complied with the terms and conditions of the agreement.

This letter is being written to document the above situations and serves as a written warning of the Departments concern. Please understand that if you, or any of your satellites, violate any CCR T-14 sections, Fish and Game Code laws, or any conditions of the Wildlife Rehabilitation MOU in the future, the Department will revoke your Wildlife Rehabilitation Permit.

Wildlife rehabilitation is an important service for wildlife and the public. The Department's MOU was developed to establish important conditions that optimize the success of rehabilitating wildlife, and we value the efforts contributed by those that recognize this intent.

If you have any questions regarding this letter please do not hesitate to contact me.

Sincerely,

Nicole Carion
Statewide Wildlife Rehabilitation Program Coordinator
Associate Wildlife Biologist
California Department of Fish and Game
530-357-3986
ncarion@dfg.ca.gov



State of California -The Natural Resources Agency
DEPARTMENT OF FISH AND GAME
1416 9th Street
Sacramento, CA 95814
<http://www.dfg.ca.gov>

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



March 28, 2013

Ms. Mary Cummins
Animal Advocates
645 W. 9th St. #110-140
Los Angeles, CA 90015

Dear Ms. Cummins,

This letter is to advise you that your 2012 Annual Year End Report is incomplete and you are in violation of Section 15 (b) of your Wildlife Rehabilitation Memorandum of Understanding, which states:

15. The Permittee shall be responsible for providing the Department with an annual report that is Due by January 30th of each year. If annual reports are not submitted by January 30th of each year, this MOU will automatically expire. The annual report shall contain the following information listed below:

b. A complete inventory of all non-releasable wildlife (this condition is not applicable to rehabilitation organizations possessing educational wildlife pursuant to the Exhibitors MOU issued by the department). The inventory shall include:

- 1. All deletions and additions to the previous years' inventory of non-releasable wildlife.*
- 2. A description of each animal's impairment which makes it non-releasable.*
- 3. The name of the veterinarian and the department employee who classified the animal as non-releasable.*
- 4. The date the animal was classified non-releasable.*

The Annual Year End Report form also contains a space for the location of the animal.

Your 2012 report does not include any of the information described in Section 15(b.) (See attached Copy of your 2012 Annual Year End Report.) Please note that there is not a specific box for condition number 15(b)(3) on the Annual Year End Report because the information is usually provided in the form of a letter from a veterinarian prior to the animal being approved and reported on the Annual Year End Report. Nonetheless, you are required to submit such information.

You must submit a completed 2012 Annual Year End Report to the California Department of Fish and Wildlife (Department) containing all of the information required in Section 15(b), including information

Conserving California's Wildlife Since 1870

Name Ms. Mary Cummins
Date March 28, 2013
Page # 2

required by 15(b)(3), by April 26, 2013 (30 days).

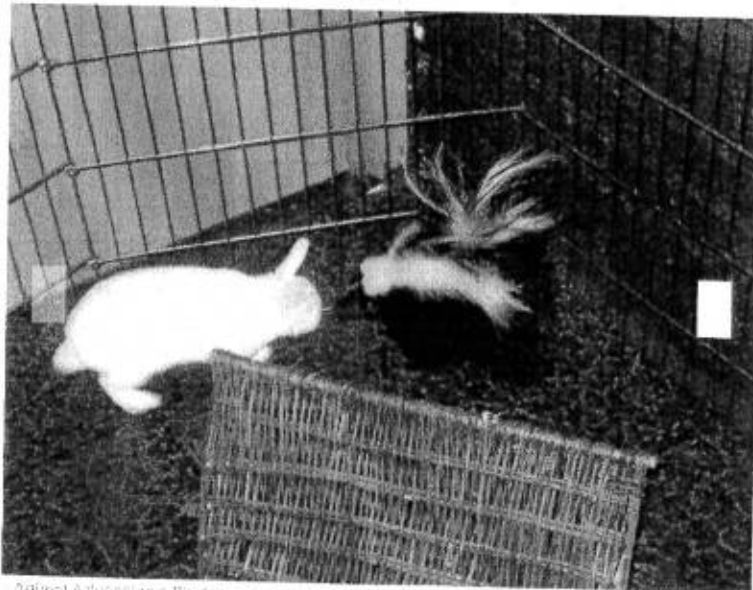
Please be advised that this is the second letter the Department has sent you regarding this issue. The first letter was in a letter sent March 3, 2007 (See attached letter/incident of concern #3). In addition, your Annual Year End Reports were incomplete in 2005, 2006, 2007, 2008, 2009, 2010, and 2011. Your failure to complete these reports and your submission of false information in others were cited by the Department as grounds for denial of your Exhibiting Permit application.

Please call me at 530-357-3986 if you have any questions.

Sincerely,

Nicole Carion
Statewide Coordinator for Wildlife Rehabilitation
CA Dept. Fish and Wildlife
Nicole.Carion@wildlife.ca.gov

Department Exhibit 2



Animal Advocates's Photos
in White Rabbits And Cats rescued by Animal Advocates



Animal Advocates
Like This Page · April 20 · Edited

Here are some domestic bunnies and cats rescued by Mary Cummins of Animal Advocates. Animal Advocates <http://www.AnimalAdvocates.us/> Okay, that's not a cat but Sammy skunk. <http://www.facebook.com/AnimalAdvocatesUSA> <http://AnimalAdvocatesWildlifeRehabilitation.blogspot.com/> — at Animal Advocates.

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Thursday, May 1 at 7:00pm

Join ·

Department Exhibit 3



Kiene, David@Wildlife

From: Mary Cummins <Mary@AnimalAdvocates.us>
Sent: Thursday, July 03, 2014 3:41 PM
To: Kiene, David@Wildlife; Wildlife DIRECTOR; Yparraguirre, Dan@Wildlife; Loft, Eric@Wildlife
Subject: Re: LEGAL COMMUNICATION Re: I have not heard anything back Re: Wildlife Rehabilitation Permit Renewal (DFW Response 1 of 2)

In my file are replies to these letters in the exhibits. Did Nicole not give you the replies?

For instance exhibit one is a letter she sent to me. I replied to that yet you don't attach my replies. I have copies. I noted that the supposed video of my ex-husband touching an opossum did not exist. In later emails Nicole admitted she never saw the video. She was just told about it by another.

Nicole told me to give my six week kitten to Anna Reams to join with her six MONTH kitten. I contacted Chuck Traisi and another bobcat expert. They sent emails stating Reams must release her six month cat. They also stated if you put a six week kitten with a six month cat the older one will instantly kill the kitten. Nicole Carion does not, did not have much experience with wildlife or wildlife rehabilitation.

Nicole also told me that "Virginia opossums are only native to Virginia." This species has been around in the same form for 95 million years. There is fossil evidence of this species from the Eocene epoch (56 to 34 million years ago) in Simi Valley, Fillmore, Santa Paula in Ventura County. They were discovered many years ago at Tapo Ranch (Fossil Vertebrates of Southern California, pg 20, Theodore Downs, 1968, UCLA).

I replied to and refuted everything in Exhibit 1. My replies are in my file. My replies, which I have, are some of the documents Carion did not give to the Judge even though she had them. I believe she either disobeyed the Judge's order or destroyed the documents.

On Jul 3, 2014, at 2:53 PM, Kiene, David@Wildlife wrote:

Dear Ms. Cummins,

Attached is a copy of Animal Advocates' "Memorandum of Understanding for the Purpose of Wildlife Rehabilitation," a letter from Eric Loft, Chief of the Wildlife Branch, addressing several violations, and Exhibits 1 & 2 to the letter. Exhibit 3 will be sent in a separate e-mail. The letter was mailed on June 20, 2014. Another copy of the letter and MOU was re-sent today via USPS first class mail. Please note that nothing in the Public Records Act (Govt. Code, section 6250 et seq.) exempts this e-mail, and the e-mail below, from disclosure.

From: Mary Cummins [<mailto:Mary@AnimalAdvocates.us>]
Sent: Friday, June 27, 2014 12:46 PM
To: Wildlife DIRECTOR; Gibson, Thomas@Wildlife
Cc: Loft, Eric@Wildlife; Barnes, Kelly@Wildlife; Yparraguirre, Dan@Wildlife; Hunting, Kevin@Wildlife; Carion, Nicole@Wildlife
Subject: LEGAL COMMUNICATION Re: I have not heard anything back Re: Wildlife Rehabilitation Permit Renewal

LEGAL COMMUNICATION - NOT TO BE SHARED IN ANY INFORMATION ACT REQUEST

This is a legal communication between Mary Cummins, Animal Advocates and Fish & Wildlife Legal Counsel Thomas Gibson. It is therefore not part of public information. My previous communications also were of a legal nature and should not be shared with the public.

We have been told our permit is in "review." We continue to rehab wildlife. We continue to possess wildlife. We continue to follow all rules and regulations.

Again, we have been told by wardens who viewed our files recently there are no complaints against us. I have sent in another info act request for any complaints and have received none.

We just renewed our USDA permit. We have an 11 year perfect history with USDA. Not one violation or remark and they inspect annually unannounced. Fish & Wildlife has only inspected us twice by appointment. We passed all inspections.

If there is an issue with our permit, we will appeal to the commission and then the state court like we did with our exhibitor permit. In that case Nicole Carion committed perjury, was in contempt of a Judge's order and destroyed evidence. Fish & Wildlife admitted this in a letter to me. We are willing to file a lawsuit if necessary. We would suffer extreme financial damages if our permit is denied.

Again, Fish & Wildlife illegally gave our my social security number to the public and my confidential home address. We have been severely financially damaged because of this.

I filed a whistle blower report with the State Auditor. I believe Nicole Carion personally hates me which is why she has not replied to my inquiry about my permit. I renewed the permit within an hour of sending the request. I sent it via email and USPS. I will continue to send this email every month until this matter is resolved. I believe she is retaliating against me because of this article which has been picked up by other media.

<http://www.indybay.org/newsitems/2014/01/17/18749347.php>

In 2003 Fish & Wildlife changed all of our MOUs to read we must comply with all other regulations especially zoning. I spent two years to amend LA County zoning to make wildlife rehabilitation legal in the county. Currently there are only three of us out of 90 in the state who are in compliance. No one else bothered to get a conditional use permit, variance or move to a properly zoned area. That would mean all other rehab permits are void.

Wildlife Waystation never had a rehab permit ever. They have been rehabbing wildlife for 40 years without a permit. They have been turning orphan wildlife into pets. They feed injured wildlife to their other animals. They have not had an exhibit permit for over a decade yet still exhibit to "volunteers" every weekend for a fee.

Paula Drake never had a rehab permit ever. She was allowed to rehab without a permit. I have contacted the lawyers involved in these cases.

Mary Cummins
Animal Advocates
<http://www.AnimalAdvocates.us>
CA DFG permitted Wildlife Rehabilitator
Rio Hondo Police Academy
State Humane Association of California
Animal Law Enforcement Academy

HSUS NDART, USDA
IWRC, NWRA, CCWR

<image001.jpg>

On Apr 30, 2014, at 10:00 AM, Mary Cummins wrote:

Attached are some of the letters of recommendation I sent in with my exhibit permit application. They are from the Mayor's office of Los Angeles, Warden Joseph Baima, City of Moorpark, GM of Los Angeles Animal Services, GM of Santa Monica Animal Services and two licensed wildlife rehabilitators. Please, let me know what is happening. One of my volunteers is now sick from stress from worrying about this.

If someone has made a complaint, I need to see the complaint. I always follow all the rules and regulations. There are two people who are stalking me who stated on line that their goal is to cause me to lose my permit. They have posted many false things about me on the Internet. They've never seen my place or my animals. One is Rebecca Dmytryk who has had problems with the Department for years. The other is Amanda Lollar of Bat World Sanctuary whom I reported for animal cruelty and violations of the Animal Welfare Act. She lost her permit.

Mary Cummins
Animal Advocates

<mary_cummins_letters_recommendation.pdf>

On Apr 29, 2014, at 3:49 PM, Loft, Eric@Wildlife wrote:

Hi Ms. Cummins:

We apologize for the delay in responding to your emails.

Your request to renew your rehabilitation permit is still being processed and under review with our legal and scientific staff. The fact that a facility may be listed on our website does not reflect approval or denial of a permit. That website is merely a reference for the public and needs periodic updating. Thank you for advising us on it.

Our understanding related to an exhibiting permit is that the materials and fees required have not been fully submitted. If we are in error, please advise. Attached is a copy of the Commission decision from last August related to this that indicates the process for the permit that we believe you received. As I think you may know, our License and Revenue Branch is the contact for submitting the required information to obtain a permit.

Thank you- Eric

Eric R. Loft, Ph.D, Chief
Wildlife Branch
California Department of Fish and Wildlife
1812 Ninth Street, Sacramento, CA 95811
(916) 445-3555; eric.loft@wildlife.ca.gov
Web: www.wildlife.ca.gov

From: Mary Cummins [mailto:mmmaryinla@aol.com]

Sent: Tuesday, April 29, 2014 3:35 PM

To: Wildlife DIRECTOR

Cc: Loft, Eric@Wildlife; Barnes, Kelly@Wildlife; Yparraguirre, Dan@Wildlife; Hunting, Kevin@Wildlife; Carion, Nicole@Wildlife

Subject: I have not heard anything back Re: Wildlife Rehabilitation Permit Renewal

It's now been over 1.5 days and I have not heard anything back from Nicole Carion or the Department. I left a few phone messages. They stated they would tell Nicole Carion to contact me. She has not done that. Let me know what is happening. I am currently rehabilitating wildlife. I have wildlife. Our organization is still listed as a permitted facility on the Fish & Wildlife website. I have not received anything either way. Should I start an appeal and a lawsuit? I already filed a complaint against Carion. You will see it in her personnel file. She committed the crime of perjury in sworn court documents. That is a crime in California. I will continue to call, fax, email until I find out what is happening.

Mary Cummins
Animal Advocates

On Apr 29, 2014, at 11:36 AM, Mary Cummins wrote:

Our organization Animal Advocates is still listed as a permitted facility. If this is just an over sight, please, send us our renewal permit. It's one page which can be emailed. Nicole merely emails us these permits. Our last permit which expired March 31, 2014 is attached. (All of the many spelling errors in this permit were made by Nicole Carion i.e. INDIGINOUS, PUSUANT, REHABILITATION, REHABILITATED, FACILITES, RESONABLE). She made these spelling errors in the permit of every single wildlife rehabilitator in California. She still has not posted her annuals reports for 2012 or 2013. She receives the numbers from us January 31 and should be able to finish her two page report within a week or two. I also attached her March 2011 email where she merely emails us our permits so you can see she made all those spelling errors. We did not alter the permit.

We need a permit to operate. They can just change the date to 2017. Thanks.

Mary Cummins
Animal Advocates

<MaryCumminspermit.pages.pdf>
<Wildlife Rehabilitation Permit.pdf>

Begin forwarded message:

From: Mary Cummins <Mary@AnimalAdvocates.us>

Date: April 29, 2014 10:02:39 AM PDT

To: " director@wildlife.ca.gov"

<director@wildlife.ca.gov>, John.Donnelly@wildlife.ca.gov, Kelly.Barnes@wildlife.ca.gov, Eric.Loft@wildlife.ca.gov, Steve.Torres@wildlife.ca.gov, info@californiawildlifefoundation.org

Subject: Wildlife Rehabilitation Permit Renewal

Fish & Wildlife,

I have been a wildlife rehabilitator in region five since 2004 on my own permit and 2001 on other permits. We are the only licensed wildlife rehabilitation facility in the City of Los Angeles. Los Angeles is comprised of over 500 square miles and over 4.5 million residents. I worked two years to get the new wildlife policy passed in the City in 2004 (http://www.businesswire.com/news/home/20040824005654/en/City-Los-Angeles-Approves-Wildlife-Policy#.U1_TqCigbfA). I also got an amendment to Los Angeles County zoning to allow for wildlife rehabilitation (<http://www.animaladvocates.us/countyallowswildliferehabilitation.htm>). Wildlife rehabilitation is actually illegal in almost every other city and county in the State of California.

February 19, 2014 wildlife rehabilitation coordinator Nicole Carion sent us an email telling us to renew our permit which expires March 15, 2014. In less than an hour I emailed and snail mailed our renewal documents with a check (see attached). It is now April 29, 2014 and I still don't have my renewed permit. We must have a permit to operate. I have received no cancellation letter or permit. We timely filed our annual report.

Yesterday I sent Nicole another email about this and no response. Nicole has been late with her annual reports for years now. The number of rehabbers has gone down since 2004 when Carion took over because of these problems. Nicole previously denied me my exhibiting permit which I appealed and won. I went above the Fish & Game Commission to the State Court. Fish & Wildlife wasted thousands of dollars on legal fees in that case. The Judge ruled that I fulfilled all the requirements and Nicole was wrong to deny me my permit.

Nicole Carion lied in sworn documents. She committed perjury which is a crime. I was forced to file a complaint against Nicole Carion for perjury, being in contempt of a Judge's court order and destroying evidence. Nicole lied and stated I didn't give her an annual report when I did. It's a one page form which takes a few minutes to fill out. The Fish & Game Commission then ruled that they would approve my appeal and issue me the permit. Fish & Wildlife still have not issued that permit as instructed. I'm being retaliated against for reporting Nicole Carion for committing the crime of perjury. There is a full report in her personnel file. In the meantime I'm being forced to euthanize animals which could be used for wildlife education.

We are working with the Annenberg Foundation on a wildlife project and they asked to see our permit yesterday. That's when I realized I hadn't received it yet. The Annenberg Foundation is working with Fish & Wildlife on the Playa project. We have been rehabbing wildlife all baby season.

Please, let me know what is happening. Do I have to file a lawsuit, appeal to the Fish & Game commission, go to the media? I am willing to do all those things. I've spoken in front of the Commission about the appeal of my exhibitor permit which they approved. I will gladly go to the next few meetings to speak about these problems. Or is this just another over sight by Nicole Carion? I've received no letter either way. Please, let me know so I can take immediate action. Thank you.

Please, do not share my home address or banking information in the attached file.

Mary Cummins
Animal Advocates
<http://www.AnimalAdvocates.us>
Over 50,000 fans on Facebook!
<http://www.facebook.com/AnimalAdvocatesUSA>
CA DFG permitted Wildlife Rehabilitator
Rio Hondo Police Academy
State Humane Association of California
Animal Law Enforcement Academy

HSUS NDART, USDA
IWRC, NWRA, CCWR

<animaladvocates22copy.jpg>

Begin forwarded message:

From: Mary Cummins <mmmaryinla@aol.com>
Date: February 19, 2014 10:13:06 AM PST
To: "Carion, Nicole@Wildlife" <Nicole.Carion@wildlife.ca.gov>
Subject: Re: Wildlife Rehabilitation Permit Renewal

Attached is a pdf of what I just mailed to you. Do not share the Beverly Glen address. Do not share a my check or financial information. Thanks.

Mary Cummins
Animal Advocates

<animal_advocates_dfg_renewal.pdf>

On Feb 19, 2014, at 9:32 AM, Carion, Nicole@Wildlife wrote:

Dear Wildlife Rehabilitation Permittee,

Your wildlife rehabilitation permit will expire soon, and if you would like to continue to rehabilitate wild animals you must renew your permit.

As of April 2007, the revised and approved California Code of Regulations Section 679 requires the following:

To renew a wildlife rehabilitation permit, a permittee must fill out the renewal form FG542(**answer only questions 1-11, 13, 17 and 28**) and send the completed renewal form and the renewal fee of \$41.00 (cashiers check, money order, or personal check) to:

Department of Fish and Wildlife
Att: Nicole Carion
Statewide Wildlife Rehabilitation Coordinator
601 Locust Street
Redding, CA 96001
Make checks payable to the California Department of Fish and Wildlife.

Your new wildlife rehabilitation permit/MOU will be sent shortly thereafter. Incomplete applications or failure to pay renewal fee

could delay the issuance of your permit. Your new permit will be valid for three years. The renewal fee will only be required every three years with the renewal of the permit. Renewal applicants will not have to pay an inspection fee, only the renewal fee of \$41.00. An inspection is not required for renewal.

If you have any further question please don't hesitate to call. The Renewal form is being sent with this letter in the form of an attachment. See attached form.

Nicole Carion
Wildlife Investigations Lab
Ca. Dept. Fish and Wildlife
Phone 530-357-3986
Fax 530-357-3478
Nicole.Carion@wildlife.ca.gov

<Wildlife Rehab Permit Application-Renewal Form.pdf - Adobe Rea.pdf>

Mary Cummins
MMMARYinLA@AOL.COM

<mcsmallsm.jpg>

Mary Cummins
MMMARYinLA@AOL.COM

<mcsmallsm.jpg>

Mary Cummins
MMMARYinLA@AOL.COM

<image001.jpg>

<fish_game_permit (3).pdf>

Mary Cummins
MMMARYinLA@AOL.COM

<mesmallsm.jpg>

<AnimalAdvocatesMOU.doc><Exhibits 1 & 2.pdf><Letter to Mary Cummins.pdf>

Kiene, David@Wildlife

From: Animal Advocates <mary@animaladvocates.us>
Sent: Friday, July 18, 2014 1:31 PM
To: Loft, Eric@Wildlife
Cc: Kiene, David@Wildlife; Torres, Steve@Wildlife; Yparraguirre, Dan@Wildlife; Carion, Nicole@Wildlife
Subject: Re: LEGAL COMMUNICATION Re: I have not heard anything back Re: Wildlife Rehabilitation Permit Renewal

Attached is the signed MOU. I am sending hard copy as well. The actual one page permit was not included. I need this to pick up animals from shelter. If you could email this, I would appreciate this.

MOU signed May 5 but sent in July two months later. A lot of stress, emails could have been avoided if it were sent in May.

Sent from my iPhone which has an evil spell checker/editor

> On Jul 17, 2014, at 7:26 AM, "Loft, Eric@Wildlife" <Eric.Loft@wildlife.ca.gov> wrote:

>

> Trying to catch up still. Did she get our letter or not?? Are we done for a bit? Does she have an Exhibit permit?

>

> Phone sent- Eric

>

>> On Jul 2, 2014, at 3:46 PM, "Kiene, David@Wildlife" <David.Kiene@wildlife.ca.gov> wrote:

>>

>> Dear Ms. Cummins,

>>

>> Attached is a copy of Animal Advocates' "Memorandum of Understanding for the Purpose of Wildlife Rehabilitation" and a letter with attachments from Eric Loft, Chief of the Wildlife Branch, addressing several violations. The letter was mailed on June 20, 2014. Another copy of the letter and MOU will be re-sent via USPS first class mail tomorrow. Please note that nothing in the Public Records Act (Govt. Code, section 6250 et seq.) exempts this e-mail, and the e-mail below, from disclosure.

>>

>>

>> David Kiene

>> Senior Staff Counsel

>> Office of the General Counsel

>> California Department of Fish and Wildlife

>> (916) 651-7646

>> (916) 654-3805 (fax)

>>

>>

>> From: Mary Cummins [mailto:Mary@AnimalAdvocates.us]

>> Sent: Friday, June 27, 2014 12:46 PM

>> To: Wildlife DIRECTOR; Gibson, Thomas@Wildlife

>> Cc: Loft, Eric@Wildlife; Barnes, Kelly@Wildlife; Yparraguirre,

>> Dan@Wildlife; Hunting, Kevin@Wildlife; Carion, Nicole@Wildlife

>> Subject: LEGAL COMMUNICATION Re: I have not heard anything back Re:

>> Wildlife Rehabilitation Permit Renewal

>>
>> LEGAL COMMUNICATION - NOT TO BE SHARED IN ANY INFORMATION ACT REQUEST
>>
>> This is a legal communication between Mary Cummins, Animal Advocates and Fish & Wildlife Legal Counsel Thomas Gibson. It is therefore not part of public information. My previous communications also were of a legal nature and should not be shared with the public.
>>
>> We have been told our permit is in "review." We continue to rehab wildlife. We continue to possess wildlife. We continue to follow all rules and regulations.
>>
>> Again, we have been told by wardens who viewed our files recently there are no complaints against us. I have sent in another info act request for any complaints and have received none.
>>
>> We just renewed our USDA permit. We have an 11 year perfect history with USDA. Not one violation or remark and they inspect annually unannounced. Fish & Wildlife has only inspected us twice by appointment. We passed all inspections.
>>
>> If there is an issue with our permit, we will appeal to the commission and then the state court like we did with our exhibitor permit. In that case Nicole Carion committed perjury, was in contempt of a Judge's order and destroyed evidence. Fish & Wildlife admitted this in a letter to me. We are willing to file a lawsuit if necessary. We would suffer extreme financial damages if our permit is denied.
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>> Again, Fish & Wildlife illegally gave our my social security number to the public and my confidential home address. We have been severely financially damaged because of this.
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>> I filed a whistle blower report with the State Auditor. I believe Nicole Carion personally hates me which is why she has not replied to my inquiry about my permit. I renewed the permit within an hour of sending the request. I sent it via email and USPS. I will continue to send this email every month until this matter is resolved. I believe she is retaliating against me because of this article which has been picked up by other media.
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>> <http://www.indybay.org/newsitems/2014/01/17/18749347.php>
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>> In 2003 Fish & Wildlife changed all of our MOUs to read we must comply with all other regulations especially zoning. I spent two years to amend LA County zoning to make wildlife rehabilitation legal in the county. Currently there are only three of us out of 90 in the state who are in compliance. No one else bothered to get a conditional use permit, variance or move to a properly zoned area. That would mean all other rehab permits are void.
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>> Wildlife Waystation never had a rehab permit ever. They have been rehabbing wildlife for 40 years without a permit. They have been turning orphan wildlife into pets. They feed injured wildlife to their other animals. They have not had an exhibit permit for over a decade yet still exhibit to "volunteers" every weekend for a fee.
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>> Paula Drake never had a rehab permit ever. She was allowed to rehab without a permit. I have contacted the lawyers involved in these cases.
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>> Mary Cummins
>> Animal Advocates
>> <http://www.AnimalAdvocates.us>
>> CA DFG permitted Wildlife Rehabilitator Rio Hondo Police Academy
>> State Humane Association of California Animal Law Enforcement Academy
>> HSUS NDART, USDA IWRC, NWRA, CCWR
>>
>> [cid:image001.jpg@01CF960B.449E37A0]

>>

>>

>> On Apr 30, 2014, at 10:00 AM, Mary Cummins wrote:

>>

>> Attached are some of the letters of recommendation I sent in with my exhibit permit application. They are from the Mayor's office of Los Angeles, Warden Joseph Baima, City of Moorpark, GM of Los Angeles Animal Services, GM of Santa Monica Animal Services and two licensed wildlife rehabilitators. Please, let me know what is happening. One of my volunteers is now sick from stress from worrying about this.

>>

>> If someone has made a complaint, I need to see the complaint. I always follow all the rules and regulations. There are two people who are stalking me who stated on line that their goal is to cause me to lose my permit. They have posted many false things about me on the Internet. They've never seen my place or my animals. One is Rebecca Dmytryk who has had problems with the Department for years. The other is Amanda Lollar of Bat World Sanctuary whom I reported for animal cruelty and violations of the Animal Welfare Act. She lost her permit.

>>

>> Mary Cummins

>> Animal Advocates

>>

>> <mary_cummins_letters_recommendation.pdf>

>>

>>

>> On Apr 29, 2014, at 3:49 PM, Loft, Eric@Wildlife wrote:

>>

>> Hi Ms. Cummins:

>>

>> We apologize for the delay in responding to your emails.

>>

>> Your request to renew your rehabilitation permit is still being processed and under review with our legal and scientific staff. The fact that a facility may be listed on our website does not reflect approval or denial of a permit. That website is merely a reference for the public and needs periodic updating. Thank you for advising us on it.

>>

>> Our understanding related to an exhibiting permit is that the materials and fees required have not been fully submitted. If we are in error, please advise. Attached is a copy of the Commission decision from last August related to this that indicates the process for the permit that we believe you received. As I think you may know, our License and Revenue Branch is the contact for submitting the required information to obtain a permit.

>>

>> Thank you- Eric

>>

>> Eric R. Loft, Ph.D, Chief

>> Wildlife Branch

>> California Department of Fish and Wildlife

>> 1812 Ninth Street, Sacramento, CA 95811

>> (916) 445-3555;

>> eric.loft@wildlife.ca.gov<mailto:eric.loft@wildlife.ca.gov>

>> Web: www.wildlife.ca.gov<http://www.wildlife.ca.gov/>

>>

>>

>> From: Mary Cummins [mailto:mmmaryinla@aol.com]

>> Sent: Tuesday, April 29, 2014 3:35 PM

>> To: Wildlife DIRECTOR

>> Cc: Loft, Eric@Wildlife; Barnes, Kelly@Wildlife; Yparraguirre,

>> Dan@Wildlife; Hunting, Kevin@Wildlife; Carion, Nicole@Wildlife

>> Subject: I have not heard anything back Re: Wildlife Rehabilitation

>> Permit Renewal

>>

>> It's now been over 1.5 days and I have not heard anything back from Nicole Carion or the Department. I left a few phone messages. They stated they would tell Nicole Carion to contact me. She has not done that. Let me know what is happening. I am currently rehabilitating wildlife. I have wildlife. Our organization is still listed as a permitted facility on the Fish & Wildlife website. I have not received anything either way. Should I start an appeal and a lawsuit? I already filed a complaint against Carion. You will see it in her personnel file. She committed the crime of perjury in sworn court documents. That is a crime in California. I will continue to call, fax, email until I find out what is happening.

>>

>> Mary Cummins

>> Animal Advocates

>>

>> On Apr 29, 2014, at 11:36 AM, Mary Cummins wrote:

>>

>>

>> Our organization Animal Advocates is still listed as a permitted facility. If this is just an over sight, please, send us our renewal permit. It's one page which can be emailed. Nicole merely emails us these permits. Our last permit which expired March 31, 2014 is attached. (All of the many spelling errors in this permit were made by Nicole Carion i.e. INDIGINOUS, PUSUANT, REHABILATION, REHABILATATED, FACILITES, RESONABLE). She made these spelling errors in the permit of every single wildlife rehabilitator in California. She still has not posted her annuals reports for 2012 or 2013. She receives the numbers from us January 31 and should be able to finish her two page report within a week or two. I also attached her March 2011 email where she merely emails us our permits so you can see she made all those spelling errors. We did not alter the permit.

>>

>> We need a permit to operate. They can just change the date to 2017. Thanks.

>>

>> Mary Cummins

>> Animal Advocates

>>

>> <MaryCumminspermit.pages.pdf>

>> <Wildlife Rehabilitation Permit.pdf>

>>

>>

>> Begin forwarded message:

>>

>>

>> From: Mary Cummins

>> <Mary@AnimalAdvocates.us<mailto:Mary@AnimalAdvocates.us>>

>> Date: April 29, 2014 10:02:39 AM PDT

>> To: "director@wildlife.ca.gov<mailto:director@wildlife.ca.gov>"

>> <director@wildlife.ca.gov<mailto:director@wildlife.ca.gov>>,>

>> John.Donnelly@wildlife.ca.gov<mailto:John.Donnelly@wildlife.ca.gov>,>

>> Kelly.Barnes@wildlife.ca.gov<mailto:Kelly.Barnes@wildlife.ca.gov>,>Eri

>> c.Loft@wildlife.ca.gov<mailto:Eric.Loft@wildlife.ca.gov>,>

>> Steve.Torres@wildlife.ca.gov<mailto:Steve.Torres@wildlife.ca.gov>,>

>> info@californiawildlifefoundation.org<mailto:info@californiawildlifef

>> oundation.org>

>> Subject: Wildlife Rehabilitation Permit Renewal

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>> Fish & Wildlife,

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>>

>> Please, do not share my home address or banking information in the attached file.

>>

>> Mary Cummins

>> Animal Advocates

>> <http://www.AnimalAdvocates.us><<http://www.AnimalAdvocates.us/>>

>> Over 50,000 fans on Facebook!

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>> CA DFG permitted Wildlife Rehabilitator Rio Hondo Police Academy

>> State Humane Association of California Animal Law Enforcement Academy

>> HSUS NDART, USDA IWRC, NWRA, CCWR <animaladvocates22copy.jpg>

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>> <Nicole.Carion@wildlife.ca.gov<mailto:Nicole.Carion@wildlife.ca.gov>>
>> Subject: Re: Wildlife Rehabilitation Permit Renewal

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>> Mary Cummins
>> Animal Advocates
>> <animal_advocates_dfg_renewal.pdf>

>>
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>> To renew a wildlife rehabilitation permit, a permittee must fill out the renewal form FG542(answer only questions 1-11, 13, 17 and 28) and send the completed renewal form and the renewal fee of \$41.00 (cashiers check, money order, or personal check) to:

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>> Redding, CA 96001

>> Make checks payable to the California Department of Fish and Wildlife.

>>
>> Your new wildlife rehabilitation permit/MOU will be sent shortly thereafter. Incomplete applications or failure to pay renewal fee could delay the issuance of your permit. Your new permit will be valid for three years. The renewal fee will only be required every three years with the renewal of the permit. Renewal applicants will not have to pay an inspection fee, only the renewal fee of \$41.00. An inspection is not required for renewal.

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>> If you have any further question please don't hesitate to call. The Renewal form is being sent with this letter in the form of an attachment. See attached form.

>>
>>
>>
>> Nicole Carion
>> Wildlife Investigations Lab
>> Ca. Dept. Fish and Wildlife
>> Phone 530-357-3986
>> Fax 530-357-3478
>> Nicole.Carion@wildlife.ca.gov<mailto:Nicole.Carion@wildlife.ca.gov>

>>
>> <Wildlife Rehab Permit Application-Renewal Form.pdf - Adobe Rea.pdf>

>>

>> Mary Cummins
>> MMMARYinLA@AOL.COM<mailto:MMMARYinLA@AOL.COM>
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>> <Letter to Mary Cummins.pdf>
>> <Letter exhibits.pdf>
>> <AnimalAdvocatesMOU.doc>
>> <image001.jpg>
> <image001.jpg>

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To: Loft, Eric@Wildlife
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Subject: Re: LEGAL COMMUNICATION Re: I have not heard anything back Re: Wildlife Rehabilitation Permit Renewal

I just got letter stating rehab permit renewed. Thanks so much! We're still sending in full response to letter. Our attorney is out of the office today.

Sent from my iPhone which has an evil spell checker/editor

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>> David Kiene

>> Senior Staff Counsel

>> Office of the General Counsel

>> California Department of Fish and Wildlife

>> (916) 651-7646

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>> <http://www.indybay.org/newsitems/2014/01/17/18749347.php>

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>>
>>
>> On Apr 29, 2014, at 3:49 PM, Loft, Eric@Wildlife wrote:
>>
>> Hi Ms. Cummins:
>>
>> We apologize for the delay in responding to your emails.
>>
>> Your request to renew your rehabilitation permit is still being processed and under review with our legal and scientific staff. The fact that a facility may be listed on our website does not reflect approval or denial of a permit. That website is merely a reference for the public and needs periodic updating. Thank you for advising us on it.
>>
>> Our understanding related to an exhibiting permit is that the materials and fees required have not been fully submitted. If we are in error, please advise. Attached is a copy of the Commission decision from last August related to this that indicates the process for the permit that we believe you received. As I think you may know, our License and Revenue Branch is the contact for submitting the required information to obtain a permit.
>>
>> Thank you- Eric
>>
>> Eric R. Loft, Ph.D, Chief
>> Wildlife Branch
>> California Department of Fish and Wildlife
>> 1812 Ninth Street, Sacramento, CA 95811
>> (916) 445-3555;
>> eric.loft@wildlife.ca.gov<mailto:eric.loft@wildlife.ca.gov>
>> Web: www.wildlife.ca.gov<http://www.wildlife.ca.gov/>
>>
>>
>> From: Mary Cummins [mailto:mmmaryinla@aol.com]
>> Sent: Tuesday, April 29, 2014 3:35 PM
>> To: Wildlife DIRECTOR
>> Cc: Loft, Eric@Wildlife; Barnes, Kelly@Wildlife; Yparraguirre,
>> Dan@Wildlife; Hunting, Kevin@Wildlife; Carion, Nicole@Wildlife
>> Subject: I have not heard anything back Re: Wildlife Rehabilitation
>> Permit Renewal
>>

>> It's now been over 1.5 days and I have not heard anything back from Nicole Carion or the Department. I left a few phone messages. They stated they would tell Nicole Carion to contact me. She has not done that. Let me know what is happening. I am currently rehabilitating wildlife. I have wildlife. Our organization is still listed as a permitted facility on the Fish & Wildlife website. I have not received anything either way. Should I start an appeal and a lawsuit? I already filed a complaint against Carion. You will see it in her personnel file. She committed the crime of perjury in sworn court documents. That is a crime in California. I will continue to call, fax, email until I find out what is happening.

>>

>> Mary Cummins

>> Animal Advocates

>>

>> On Apr 29, 2014, at 11:36 AM, Mary Cummins wrote:

>>

>>

>> Our organization Animal Advocates is still listed as a permitted facility. If this is just an over sight, please, send us our renewal permit. It's one page which can be emailed. Nicole merely emails us these permits. Our last permit which expired March 31, 2014 is attached. (All of the many spelling errors in this permit were made by Nicole Carion i.e. INDIGINOUS, PUSUANT, REHABILATION, REHABILATATED, FACILITES, RESONABLE). She made these spelling errors in the permit of every single wildlife rehabilitator in California. She still has not posted her annuals reports for 2012 or 2013. She receives the numbers from us January 31 and should be able to finish her two page report within a week or two. I also attached her March 2011 email where she merely emails us our permits so you can see she made all those spelling errors. We did not alter the permit.

>>

>> We need a permit to operate. They can just change the date to 2017. Thanks.

>>

>> Mary Cummins

>> Animal Advocates

>>

>> <MaryCumminspermit.pages.pdf>

>> <Wildlife Rehabilitation Permit.pdf>

>>

>>

>> Begin forwarded message:

>>

>>

>> From: Mary Cummins

>> <Mary@AnimalAdvocates.us<mailto:Mary@AnimalAdvocates.us>>

>> Date: April 29, 2014 10:02:39 AM PDT

>> To: "director@wildlife.ca.gov<mailto:director@wildlife.ca.gov>"

>> <director@wildlife.ca.gov<mailto:director@wildlife.ca.gov>>,

>> John.Donnely@wildlife.ca.gov<mailto:John.Donnely@wildlife.ca.gov>,

>> Kelly.Barnes@wildlife.ca.gov<mailto:Kelly.Barnes@wildlife.ca.gov>,Eri

>> c.Loft@wildlife.ca.gov<mailto:Eric.Loft@wildlife.ca.gov>,

>> Steve.Torres@wildlife.ca.gov<mailto:Steve.Torres@wildlife.ca.gov>,

>> info@californiawildlifeoundation.org<mailto:info@californiawildlifef

>> oundation.org>

>> Subject: Wildlife Rehabilitation Permit Renewal

>>

>> Fish & Wildlife,

>>

>> I have been a wildlife rehabilitator in region five since 2004 on my own permit and 2001 on other permits. We are the only licensed wildlife rehabilitation facility in the City of Los Angeles. Los Angeles is comprised of over 500 square miles and over 4.5 million residents. I worked two years to get the new wildlife policy passed in the City in 2004

(http://www.businesswire.com/news/home/20040824005654/en/City-Los-Angeles-Approves-Wildlife-Policy#.U1_TqCigbfA). I also got an amendment to Los Angeles County zoning to allow for wildlife rehabilitation (<http://www.animaladvocates.us/countyallowswildliferehabilitation.htm>). Wildlife rehabilitation is actually illegal in almost every other city and county in the State of California.

>>

>> February 19, 2014 wildlife rehabilitation coordinator Nicole Carion sent us an email telling us to renew our permit which expires March 15, 2014. In less than an hour I emailed and snail mailed our renewal documents with a check (see attached). It is now April 29, 2014 and I still don't have my renewed permit. We must have a permit to operate. I have received no cancellation letter or permit. We timely filed our annual report.

>>

>> Yesterday I sent Nicole another email about this and no response. Nicole has been late with her annual reports for years now. The number of rehabbers has gone down since 2004 when Carion took over because of these problems. Nicole previously denied me my exhibiting permit which I appealed and won. I went above the Fish & Game Commission to the State Court. Fish & Wildlife wasted thousands of dollars on legal fees in that case. The Judge ruled that I fulfilled all the requirements and Nicole was wrong to deny me my permit.

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>> Nicole Carion lied in sworn documents. She committed perjury which is a crime. I was forced to file a complaint against Nicole Carion for perjury, being in contempt of a Judge's court order and destroying evidence. Nicole lied and stated I didn't give her an annual report when I did. It's a one page form which takes a few minutes to fill out. The Fish & Game Commission then ruled that they would approve my appeal and issue me the permit. Fish & Wildlife still have not issued that permit as instructed. I'm being retaliated against for reporting Nicole Carion for committing the crime of perjury. There is a full report in her personnel file. In the meantime I'm being forced to euthanize animals which could be used for wildlife education.

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>> We are working with the Annenberg Foundation on a wildlife project and they asked to see our permit yesterday. That's when I realized I hadn't received it yet. The Annenberg Foundation is working with Fish & Wildlife on the Playa project. We have been rehabbing wildlife all baby season.

>>

>> Please, let me know what is happening. Do I have to file a lawsuit, appeal to the Fish & Game commission, go to the media? I am willing to do all those things. I've spoken in front of the Commission about the appeal of my exhibitor permit which they approved. I will gladly go to the next few meetings to speak about these problems. Or is this just another over sight by Nicole Carion? I've received no letter either way. Please, let me know so I can take immediate action. Thank you.

>>

>> Please, do not share my home address or banking information in the attached file.

>>

>> Mary Cummins

>> Animal Advocates

>> <http://www.AnimalAdvocates.us><<http://www.AnimalAdvocates.us/>>

>> Over 50,000 fans on Facebook!

>> <http://www.facebook.com/AnimalAdvocatesUSA>

>> CA DFG permitted Wildlife Rehabilitator Rio Hondo Police Academy

>> State Humane Association of California Animal Law Enforcement Academy

>> HSUS NDART, USDA IWRC, NWRA, CCWR <animaladvocates22copy.jpg>

>>

>>

>> Begin forwarded message:

>>

>>

>> From: Mary Cummins <mmmaryinla@aol.com<<mailto:mmmaryinla@aol.com>>>

>> Date: February 19, 2014 10:13:06 AM PST

>> To: "Carion, Nicole@Wildlife"

>> <Nicole.Carion@wildlife.ca.gov<mailto:Nicole.Carion@wildlife.ca.gov>>
>> Subject: Re: Wildlife Rehabilitation Permit Renewal
>>
>> Attached is a pdf of what I just mailed to you. Do not share the Beverly Glen address. Do not share a my check or financial information. Thanks.
>>
>> Mary Cummins
>> Animal Advocates
>> <animal_advocates_dfg_renewal.pdf>
>>
>> On Feb 19, 2014, at 9:32 AM, Carion, Nicole@Wildlife wrote:
>>
>>
>> Dear Wildlife Rehabilitation Permittee,
>>
>> Your wildlife rehabilitation permit will expire soon, and if you would like to continue to rehabilitate wild animals you must renew your permit.
>>
>> As of April 2007, the revised and approved California Code of Regulations Section 679 requires the following:
>>
>> To renew a wildlife rehabilitation permit, a permittee must fill out the renewal form FG542(answer only questions 1-11, 13, 17 and 28) and send the completed renewal form and the renewal fee of \$41.00 (cashiers check, money order, or personal check) to:
>> Department of Fish and Wildlife
>> Att: Nicole Carion
>> Statewide Wildlife Rehabilitation Coordinator
>> 601 Locust Street
>> Redding, CA 96001
>> Make checks payable to the California Department of Fish and Wildlife.
>>
>> Your new wildlife rehabilitation permit/MOU will be sent shortly thereafter. Incomplete applications or failure to pay renewal fee could delay the issuance of your permit. Your new permit will be valid for three years. The renewal fee will only be required every three years with the renewal of the permit. Renewal applicants will not have to pay an inspection fee, only the renewal fee of \$41.00. An inspection is not required for renewal.
>>
>> If you have any further question please don't hesitate to call. The Renewal form is being sent with this letter in the form of an attachment. See attached form.
>>
>>
>>
>> Nicole Carion
>> Wildlife Investigations Lab
>> Ca. Dept. Fish and Wildlife
>> Phone 530-357-3986
>> Fax 530-357-3478
>> Nicole.Carion@wildlife.ca.gov<mailto:Nicole.Carion@wildlife.ca.gov>
>>
>> <Wildlife Rehab Permit Application-Renewal Form.pdf - Adobe Rea.pdf>
>>
>> Mary Cummins
>> MMMARYinLA@AOL.COM<mailto:MMMARYinLA@AOL.COM>
>> <mesmallsm.jpg>

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>> <Letter to Mary Cummins.pdf>
>> <Letter exhibits.pdf>
>> <AnimalAdvocatesMOU.doc>
>> <image001.jpg>
> <image001.jpg>

Kiene, David@Wildlife

From: Mary Cummins <Mary@AnimalAdvocates.us>
Sent: Thursday, July 17, 2014 8:55 AM
To: Kiene, David@Wildlife
Cc: Torres, Steve@Wildlife; Yparraguirre, Dan@Wildlife; Carion, Nicole@Wildlife
Subject: Re: LEGAL COMMUNICATION Re: I have not heard anything back Re: Wildlife Rehabilitation Permit Renewal

I received it. My attorney and I are sending our response today.

The FGC commission voted to "approve" the exhibit permit. Then Dept, Nicole Carion, decided to make me fill out even more forms, jump through new hoops, pay more money to just harass me and try to shake me. No other exhibitor was asked to do this. I only have a skunk, opossum and squirrel. I still don't have that permit even though state judge ruled I filled out ALL forms and easily met all requirements. Nicole then did not renew my rehab permit even though I sent renewal with check within an hour of receiving renewal notice. I need both permits or I will go back to state judge again.

Sent from my iPhone which has an evil spell checker/editor

On Jul 17, 2014, at 7:26 AM, Loft, Eric@Wildlife wrote:

> Trying to catch up still. Did she get our letter or not?? Are we done for a bit? Does she have an Exhibit permit?

>

> Phone sent- Eric

>

>> On Jul 2, 2014, at 3:46 PM, "Kiene, David@Wildlife" <David.Kiene@wildlife.ca.gov> wrote:

>>

>> Dear Ms. Cummins,

>>

>> Attached is a copy of Animal Advocates' "Memorandum of Understanding for the Purpose of Wildlife Rehabilitation" and a letter with attachments from Eric Loft, Chief of the Wildlife Branch, addressing several violations. The letter was mailed on June 20, 2014. Another copy of the letter and MOU will be re-sent via USPS first class mail tomorrow. Please note that nothing in the Public Records Act (Govt. Code, section 6250 et seq.) exempts this e-mail, and the e-mail below, from disclosure.

>>

>>

>> David Kiene

>> Senior Staff Counsel

>> Office of the General Counsel

>> California Department of Fish and Wildlife

>> (916) 651-7646

>> (916) 654-3805 (fax)

>>

>>

>> From: Mary Cummins [mailto:Mary@AnimalAdvocates.us]

>> Sent: Friday, June 27, 2014 12:46 PM

>> To: Wildlife DIRECTOR; Gibson, Thomas@Wildlife

>> Cc: Loft, Eric@Wildlife; Barnes, Kelly@Wildlife; Yparraguirre,

>> Dan@Wildlife; Hunting, Kevin@Wildlife; Carion, Nicole@Wildlife

>> Subject: LEGAL COMMUNICATION Re: I have not heard anything back Re:

>> Wildlife Rehabilitation Permit Renewal

>>

>> LEGAL COMMUNICATION - NOT TO BE SHARED IN ANY INFORMATION ACT REQUEST

>>

>> This is a legal communication between Mary Cummins, Animal Advocates and Fish & Wildlife Legal Counsel Thomas Gibson. It is therefore not part of public information. My previous communications also were of a legal nature and should not be shared with the public.

>>

>> We have been told our permit is in "review." We continue to rehab wildlife. We continue to possess wildlife. We continue to follow all rules and regulations.

>>

>> Again, we have been told by wardens who viewed our files recently there are no complaints against us. I have sent in another info act request for any complaints and have received none.

>>

>> We just renewed our USDA permit. We have an 11 year perfect history with USDA. Not one violation or remark and they inspect annually unannounced. Fish & Wildlife has only inspected us twice by appointment. We passed all inspections.

>>

>> If there is an issue with our permit, we will appeal to the commission and then the state court like we did with our exhibitor permit. In that case Nicole Carion committed perjury, was in contempt of a Judge's order and destroyed evidence. Fish & Wildlife admitted this in a letter to me. We are willing to file a lawsuit if necessary. We would suffer extreme financial damages if our permit is denied.

>>

>> Again, Fish & Wildlife illegally gave our my social security number to the public and my confidential home address. We have been severely financially damaged because of this.

>>

>> I filed a whistle blower report with the State Auditor. I believe Nicole Carion personally hates me which is why she has not replied to my inquiry about my permit. I renewed the permit within an hour of sending the request. I sent it via email and USPS. I will continue to send this email every month until this matter is resolved. I believe she is retaliating against me because of this article which has been picked up by other media.

>>

>> <http://www.indybay.org/newsitems/2014/01/17/18749347.php>

>>

>> In 2003 Fish & Wildlife changed all of our MOUs to read we must comply with all other regulations especially zoning. I spent two years to amend LA County zoning to make wildlife rehabilitation legal in the county. Currently there are only three of us out of 90 in the state who are in compliance. No one else bothered to get a conditional use permit, variance or move to a properly zoned area. That would mean all other rehab permits are void.

>>

>> Wildlife Waystation never had a rehab permit ever. They have been rehabbing wildlife for 40 years without a permit. They have been turning orphan wildlife into pets. They feed injured wildlife to their other animals. They have not had an exhibit permit for over a decade yet still exhibit to "volunteers" every weekend for a fee.

>>

>> Paula Drake never had a rehab permit ever. She was allowed to rehab without a permit. I have contacted the lawyers involved in these cases.

>>

>> Mary Cummins

>> Animal Advocates

>> <http://www.AnimalAdvocates.us>

>> CA DFG permitted Wildlife Rehabilitator Rio Hondo Police Academy

>> State Humane Association of California Animal Law Enforcement Academy

>> HSUS NDART, USDA IWRC, NWRA, CCWR

>>

>> [cid:image001.jpg@01CF960B.449E37A0]

>>

>>

>> On Apr 30, 2014, at 10:00 AM, Mary Cummins wrote:

>>

>> Attached are some of the letters of recommendation I sent in with my exhibit permit application. They are from the Mayor's office of Los Angeles, Warden Joseph Baima, City of Moorpark, GM of Los Angeles Animal Services, GM of Santa Monica Animal Services and two licensed wildlife rehabilitators. Please, let me know what is happening. One of my volunteers is now sick from stress from worrying about this.

>>

>> If someone has made a complaint, I need to see the complaint. I always follow all the rules and regulations. There are two people who are stalking me who stated on line that their goal is to cause me to lose my permit. They have posted many false things about me on the Internet. They've never seen my place or my animals. One is Rebecca Dmytryk who has had problems with the Department for years. The other is Amanda Lollar of Bat World Sanctuary whom I reported for animal cruelty and violations of the Animal Welfare Act. She lost her permit.

>>

>> Mary Cummins

>> Animal Advocates

>>

>> <mary_cummins_letters_recommendation.pdf>

>>

>>

>> On Apr 29, 2014, at 3:49 PM, Loft, Eric@Wildlife wrote:

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>> Hi Ms. Cummins:

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>> We apologize for the delay in responding to your emails.

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>> Our understanding related to an exhibiting permit is that the materials and fees required have not been fully submitted. If we are in error, please advise. Attached is a copy of the Commission decision from last August related to this that indicates the process for the permit that we believe you received. As I think you may know, our License and Revenue Branch is the contact for submitting the required information to obtain a permit.

>>

>> Thank you- Eric

>>

>> Eric R. Loft, Ph.D, Chief

>> Wildlife Branch

>> California Department of Fish and Wildlife

>> 1812 Ninth Street, Sacramento, CA 95811

>> (916) 445-3555;

>> eric.loft@wildlife.ca.gov<mailto:eric.loft@wildlife.ca.gov>

>> Web: www.wildlife.ca.gov<http://www.wildlife.ca.gov/>

>>

>>

>> From: Mary Cummins [mailto:mmmaryinla@aol.com]

>> Sent: Tuesday, April 29, 2014 3:35 PM

>> To: Wildlife DIRECTOR

>> Cc: Loft, Eric@Wildlife; Barnes, Kelly@Wildlife; Yparraguirre,

>> Dan@Wildlife; Hunting, Kevin@Wildlife; Carion, Nicole@Wildlife
>> Subject: I have not heard anything back Re: Wildlife Rehabilitation
>> Permit Renewal
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>> Mary Cummins
>> Animal Advocates
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>> <MaryCumminspermit.pages.pdf>
>> <Wildlife Rehabilitation Permit.pdf>

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>> <Mary@AnimalAdvocates.us<mailto:Mary@AnimalAdvocates.us>>
>> Date: April 29, 2014 10:02:39 AM PDT
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>> Kelly.Barnes@wildlife.ca.gov<mailto:Kelly.Barnes@wildlife.ca.gov>,Eri
>> c.Loft@wildlife.ca.gov<mailto:Eric.Loft@wildlife.ca.gov>,
>> Steve.Torres@wildlife.ca.gov<mailto:Steve.Torres@wildlife.ca.gov>,
>> info@californiawildlifefoundation.org<mailto:info@californiawildlifef
>> oundation.org>
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>> Mary Cummins

>> Animal Advocates

>> <http://www.AnimalAdvocates.us><<http://www.AnimalAdvocates.us/>>

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>>
>>
>>
>> Nicole Carion
>> Wildlife Investigations Lab
>> Ca. Dept. Fish and Wildlife
>> Phone 530-357-3986
>> Fax 530-357-3478
>> Nicole.Carion@wildlife.ca.gov<mailto:Nicole.Carion@wildlife.ca.gov>
>>
>> <Wildlife Rehab Permit Application-Renewal Form.pdf - Adobe Rea.pdf>

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>> <AnimalAdvocatesMOU.doc>
>> <image001.jpg>
> <image001.jpg>

Kiene, David@Wildlife

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Cc: Kiene, David@Wildlife; Torres, Steve@Wildlife; Yparraguirre, Dan@Wildlife; Carion, Nicole@Wildlife
Subject: Re: LEGAL COMMUNICATION Re: I have not heard anything back Re: Wildlife Rehabilitation Permit Renewal
Attachments: dfg_mou.pdf

I'm resending the signed MOU in its entirety. I still have not received my rehab or exhibit permit. The rehab permit is one page. Thanks.

Mary Cummins
Animal Advocates
<http://www.AnimalAdvocates.us>
CA DFG permitted Wildlife Rehabilitator
Rio Hondo Police Academy
State Humane Association of California
Animal Law Enforcement Academy
HSUS NDART, USDA
IWRC, NWRA, CCWR



On Jul 17, 2014, at 7:26 AM, Loft, Eric@Wildlife wrote:

Trying to catch up still. Did she get our letter or not?? Are we done for a bit? Does she have an Exhibit permit?

Phone sent- Eric

On Jul 2, 2014, at 3:46 PM, "Kiene, David@Wildlife" <David.Kiene@wildlife.ca.gov> wrote:

Dear Ms. Cummins,

Attached is a copy of Animal Advocates' "Memorandum of Understanding for the Purpose of Wildlife Rehabilitation" and a letter with attachments from Eric Loft, Chief of the Wildlife Branch, addressing several violations. The letter was mailed on June 20, 2014. Another copy of the letter and MOU will be re-sent via USPS first class mail tomorrow. Please note that nothing

in the Public Records Act (Govt. Code, section 6250 et seq.) exempts this e-mail, and the e-mail below, from disclosure.

David Kiene
Senior Staff Counsel
Office of the General Counsel
California Department of Fish and Wildlife
(916) 651-7646
(916) 654-3805 (fax)

From: Mary Cummins [mailto:Mary@AnimalAdvocates.us]
Sent: Friday, June 27, 2014 12:46 PM
To: Wildlife DIRECTOR; Gibson, Thomas@Wildlife
Cc: Loft, Eric@Wildlife; Barnes, Kelly@Wildlife; Yparraguirre, Dan@Wildlife; Hunting, Kevin@Wildlife; Carion, Nicole@Wildlife
Subject: LEGAL COMMUNICATION Re: I have not heard anything back Re: Wildlife Rehabilitation Permit Renewal

LEGAL COMMUNICATION - NOT TO BE SHARED IN ANY INFORMATION ACT REQUEST

This is a legal communication between Mary Cummins, Animal Advocates and Fish & Wildlife Legal Counsel Thomas Gibson. It is therefore not part of public information. My previous communications also were of a legal nature and should not be shared with the public.

We have been told our permit is in "review." We continue to rehab wildlife. We continue to possess wildlife. We continue to follow all rules and regulations.

Again, we have been told by wardens who viewed our files recently there are no complaints against us. I have sent in another info act request for any complaints and have received none.

We just renewed our USDA permit. We have an 11 year perfect history with USDA. Not one violation or remark and they inspect annually unannounced. Fish & Wildlife has only inspected us twice by appointment. We passed all inspections.

If there is an issue with our permit, we will appeal to the commission and then the state court like we did with our exhibitor permit. In that case Nicole Carion committed perjury, was in contempt of a Judge's order and destroyed evidence. Fish & Wildlife admitted this in a letter to me. We are

willing to file a lawsuit if necessary. We would suffer extreme financial damages if our permit is denied.

Again, Fish & Wildlife illegally gave our my social security number to the public and my confidential home address. We have been severely financially damaged because of this.

I filed a whistle blower report with the State Auditor. I believe Nicole Carion personally hates me which is why she has not replied to my inquiry about my permit. I renewed the permit within an hour of sending the request. I sent it via email and USPS. I will continue to send this email every month until this matter is resolved. I believe she is retaliating against me because of this article which has been picked up by other media.

<http://www.indybay.org/newsitems/2014/01/17/18749347.php>

In 2003 Fish & Wildlife changed all of our MOUs to read we must comply with all other regulations especially zoning. I spent two years to amend LA County zoning to make wildlife rehabilitation legal in the county. Currently there are only three of us out of 90 in the state who are in compliance. No one else bothered to get a conditional use permit, variance or move to a properly zoned area. That would mean all other rehab permits are void.

Wildlife Waystation never had a rehab permit ever. They have been rehabbing wildlife for 40 years without a permit. They have been turning orphan wildlife into pets. They feed injured wildlife to their other animals. They have not had an exhibit permit for over a decade yet still exhibit to "volunteers" every weekend for a fee.

Paula Drake never had a rehab permit ever. She was allowed to rehab without a permit. I have contacted the lawyers involved in these cases.

Mary Cummins

Animal Advocates

<http://www.AnimalAdvocates.us>

CA DFG permitted Wildlife Rehabilitator

Rio Hondo Police Academy

State Humane Association of California

Animal Law Enforcement Academy

HSUS NDART, USDA

IWRC, NWRA, CCWR

[cid:image001.jpg@01CF960B.449E37A0]

On Apr 30, 2014, at 10:00 AM, Mary Cummins wrote:

Attached are some of the letters of recommendation I sent in with my exhibit permit application. They are from the Mayor's office of Los Angeles, Warden Joseph Baima, City of Moorpark, GM of Los Angeles Animal Services, GM of Santa Monica Animal Services and two licensed wildlife rehabilitators. Please, let me know what is happening. One of my volunteers is now sick from stress from worrying about this.

If someone has made a complaint, I need to see the complaint. I always follow all the rules and regulations. There are two people who are stalking me who stated on line that their goal is to cause me to lose my permit. They have posted many false things about me on the Internet. They've never seen my place or my animals. One is Rebecca Dmytryk who has had problems with the Department for years. The other is Amanda Lollar of Bat World Sanctuary whom I reported for animal cruelty and violations of the Animal Welfare Act. She lost her permit.

Mary Cummins
Animal Advocates

<mary_cummins_letters_recommendation.pdf>

On Apr 29, 2014, at 3:49 PM, Loft, Eric@Wildlife wrote:

Hi Ms. Cummins:

We apologize for the delay in responding to your emails.

Your request to renew your rehabilitation permit is still being processed and under review with our legal and scientific staff. The fact that a facility may be listed on our website does not reflect approval or denial of a permit. That website is merely a reference for the public and needs periodic updating. Thank you for advising us on it.

Our understanding related to an exhibiting permit is that the materials and fees required have not been fully submitted. If we are in error, please advise. Attached is a copy of the Commission decision from last August related to this that indicates the process for the permit that we believe you received. As I think you may know, our License and Revenue Branch is the contact for submitting the required information to obtain a permit.

Thank you- Eric

Eric R. Loft, Ph.D, Chief
Wildlife Branch

California Department of Fish and Wildlife
1812 Ninth Street, Sacramento, CA 95811
(916) 445-3555; eric.loft@wildlife.ca.gov <<mailto:eric.loft@wildlife.ca.gov>>
Web: www.wildlife.ca.gov <<http://www.wildlife.ca.gov/>>

From: Mary Cummins [<mailto:mmmaryinla@aol.com>]
Sent: Tuesday, April 29, 2014 3:35 PM
To: Wildlife DIRECTOR
Cc: Loft, Eric@Wildlife; Barnes, Kelly@Wildlife; Yparraguirre, Dan@Wildlife; Hunting, Kevin@Wildlife; Carion, Nicole@Wildlife
Subject: I have not heard anything back Re: Wildlife Rehabilitation Permit Renewal

It's now been over 1.5 days and I have not heard anything back from Nicole Carion or the Department. I left a few phone messages. They stated they would tell Nicole Carion to contact me. She has not done that. Let me know what is happening. I am currently rehabilitating wildlife. I have wildlife. Our organization is still listed as a permitted facility on the Fish & Wildlife website. I have not received anything either way. Should I start an appeal and a lawsuit? I already filed a complaint against Carion. You will see it in her personnel file. She committed the crime of perjury in sworn court documents. That is a crime in California. I will continue to call, fax, email until I find out what is happening.

Mary Cummins
Animal Advocates

On Apr 29, 2014, at 11:36 AM, Mary Cummins wrote:

Our organization Animal Advocates is still listed as a permitted facility. If this is just an oversight, please, send us our renewal permit. It's one page which can be emailed. Nicole merely emails us these permits. Our last permit which expired March 31, 2014 is attached. (All of the many spelling errors in this permit were made by Nicole Carion i.e. INDIGINOUS, PUSUANT, REHABILATION, REHABILATATED, FACILITES, RESONABLE). She made these spelling errors in the permit of every single wildlife rehabilitator in California. She still has not posted her annuals reports for 2012 or 2013. She receives the numbers from us January 31 and should be able to finish her two page report within a week or two. I also attached her March 2011 email where she merely emails us our permits so you can see she made all those spelling errors. We did not alter the permit.

We need a permit to operate. They can just change the date to 2017. Thanks.

Mary Cummins

Animal Advocates

<MaryCumminspermit.pages.pdf>

<Wildlife Rehabilitation Permit.pdf>

Begin forwarded message:

From: Mary Cummins <Mary@AnimalAdvocates.us<<mailto:Mary@AnimalAdvocates.us>>>

Date: April 29, 2014 10:02:39 AM PDT

To: "director@wildlife.ca.gov<<mailto:director@wildlife.ca.gov>>"
<director@wildlife.ca.gov<<mailto:director@wildlife.ca.gov>>>,
John.Donnelly@wildlife.ca.gov<<mailto:John.Donnelly@wildlife.ca.gov>>,
Kelly.Barnes@wildlife.ca.gov<<mailto:Kelly.Barnes@wildlife.ca.gov>>,Eric.Loft@wildlife.ca.gov<<mailto:Eric.Loft@wildlife.ca.gov>>,
Steve.Torres@wildlife.ca.gov<<mailto:Steve.Torres@wildlife.ca.gov>>,
info@californiawildlifefoundation.org<<mailto:info@californiawildlifefoundation.org>>

Subject: Wildlife Rehabilitation Permit Renewal

Fish & Wildlife,

I have been a wildlife rehabilitator in region five since 2004 on my own permit and 2001 on other permits. We are the only licensed wildlife rehabilitation facility in the City of Los Angeles. Los Angeles is comprised of over 500 square miles and over 4.5 million residents. I worked two years to get the new wildlife policy passed in the City in 2004 (http://www.businesswire.com/news/home/20040824005654/en/City-Los-Angeles-Approves-Wildlife-Policy#.U1_TqCigbfA). I also got an amendment to Los Angeles County zoning to allow for wildlife rehabilitation (<http://www.animaladvocates.us/countyallowswildliferehabilitation.htm>). Wildlife rehabilitation is actually illegal in almost every other city and county in the State of California.

February 19, 2014 wildlife rehabilitation coordinator Nicole Carion sent us an email telling us to renew our permit which expires March 15, 2014. In less than an hour I emailed and snail mailed our renewal documents with a check (see attached). It is now April 29, 2014 and I still don't have my renewed permit. We must have a permit to operate. I have received no cancellation letter or permit. We timely filed our annual report.

Yesterday I sent Nicole another email about this and no response. Nicole has been late with her annual reports for years now. The number of rehabbers has gone down since 2004 when Carion took over because of these problems. Nicole previously denied me my exhibiting permit which I appealed and won. I went above the Fish & Game Commission to the State Court. Fish & Wildlife wasted thousands of dollars on legal fees in that case. The Judge ruled that I fulfilled all the requirements and Nicole was wrong to deny me my permit.

Nicole Carion lied in sworn documents. She committed perjury which is a crime. I was forced to file a complaint against Nicole Carion for perjury, being in contempt of a Judge's court order and destroying evidence. Nicole lied and stated I didn't give her an annual report when I did. It's a one page form which takes a few minutes to fill out. The Fish & Game Commission then ruled that they would approve my appeal and issue me the permit. Fish & Wildlife still have not issued that permit as instructed. I'm being retaliated against for reporting Nicole Carion for committing the crime of perjury. There is a full report in her personnel file. In the meantime I'm being forced to euthanize animals which could be used for wildlife education.

We are working with the Annenberg Foundation on a wildlife project and they asked to see our permit yesterday. That's when I realized I hadn't received it yet. The Annenberg Foundation is working with Fish & Wildlife on the Playa project. We have been rehabbing wildlife all baby season.

Please, let me know what is happening. Do I have to file a lawsuit, appeal to the Fish & Game commission, go to the media? I am willing to do all those things. I've spoken in front of the Commission about the appeal of my exhibitor permit which they approved. I will gladly go to the next few meetings to speak about these problems. Or is this just another oversight by Nicole Carion? I've received no letter either way. Please, let me know so I can take immediate action. Thank you.

Please, do not share my home address or banking information in the attached file.

Mary Cummins

Animal Advocates

<http://www.AnimalAdvocates.us><<http://www.AnimalAdvocates.us/>>

Over 50,000 fans on Facebook!

<http://www.facebook.com/AnimalAdvocatesUSA>

CA DFG permitted Wildlife Rehabilitator

Rio Hondo Police Academy

State Humane Association of California

Animal Law Enforcement Academy

HSUS NDART, USDA

IWRC, NWRA, CCWR

<animaladvocates22copy.jpg>

Begin forwarded message:

From: Mary Cummins <mmmaryinla@aol.com<mailto:mmmaryinla@aol.com>>
Date: February 19, 2014 10:13:06 AM PST
To: "Carion, Nicole@Wildlife"
<Nicole.Carion@wildlife.ca.gov<mailto:Nicole.Carion@wildlife.ca.gov>>
Subject: Re: Wildlife Rehabilitation Permit Renewal

Attached is a pdf of what I just mailed to you. Do not share the Beverly Glen address. Do not share a my check or financial information. Thanks.

Mary Cummins
Animal Advocates
<animal_advocates_dfg_renewal.pdf>

On Feb 19, 2014, at 9:32 AM, Carion, Nicole@Wildlife wrote:

Dear Wildlife Rehabilitation Permittee,

Your wildlife rehabilitation permit will expire soon, and if you would like to continue to rehabilitate wild animals you must renew your permit.

As of April 2007, the revised and approved California Code of Regulations Section 679 requires the following:

To renew a wildlife rehabilitation permit, a permittee must fill out the renewal form FG542(answer only questions 1-11, 13, 17 and 28) and send the completed renewal form and the renewal fee of \$41.00 (cashiers check, money order, or personal check) to:

Department of Fish and Wildlife
Att: Nicole Carion
Statewide Wildlife Rehabilitation Coordinator
601 Locust Street
Redding, CA 96001

Make checks payable to the California Department of Fish and Wildlife.

Your new wildlife rehabilitation permit/MOU will be sent shortly thereafter. Incomplete applications or failure to pay renewal fee could delay the issuance of your permit. Your new permit will be valid for three years. The renewal fee will only be required every three years with the renewal of the permit. Renewal applicants will not have to pay an inspection fee, only the renewal fee of \$41.00. An inspection is not required for renewal.

If you have any further question please don't hesitate to call. The Renewal form is being sent with this letter in the form of an attachment. See attached form.

Nicole Carion

Wildlife Investigations Lab

Ca. Dept. Fish and Wildlife

Phone 530-357-3986

Fax 530-357-3478

Nicole.Carion@wildlife.ca.gov<<mailto:Nicole.Carion@wildlife.ca.gov>>

<Wildlife Rehab Permit Application-Renewal Form.pdf - Adobe Rea.pdf>

Mary Cummins

MMMARYinLA@AOL.COM<<mailto:MMMARYinLA@AOL.COM>>

<mesmallsm.jpg>

Mary Cummins

MMMARYinLA@AOL.COM<<mailto:MMMARYinLA@AOL.COM>>

<mesmallsm.jpg>

Mary Cummins

MMMARYinLA@AOL.COM<<mailto:MMMARYinLA@AOL.COM>>

<image001.jpg>

<fish_game_permit (3).pdf>

Mary Cummins

MMMARYinLA@AOL.COM<<mailto:MMMARYinLA@AOL.COM>>

<mesmallsm.jpg>

<Letter to Mary Cummins.pdf>

<Letter exhibits.pdf>

<AnimalAdvocatesMOU.doc>

<image001.jpg>

<image001.jpg>

**CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
MEMORANDUM OF UNDERSTANDING
FOR
THE PURPOSE OF WILDLIFE REHABILITATION**

This Memorandum of Understanding (MOU) is made and entered into this 5th day of May, 2014, by and between the California Department of Fish and Wildlife and

**Mary Cummins
Animal Advocates
858 N Beverly Glen Blvd.
Los Angeles, CA 90077**

(hereinafter referred to as the Permittee) and expires on May 5, 2017.

WITNESSETH:

WHEREAS, the Permittee has expressed interest in, and proven the ability to rehabilitate native sick, injured, or orphaned game birds, protected nongame birds, resident small game mammals, furbearing, and nongame mammals, reptiles, and amphibians; and,

WHEREAS, the Department is highly desirous that rehabilitation work be done on the previously mentioned species; and,

WHEREAS, the Department frequently takes possession of the previously listed birds, reptiles, amphibians, and mammals and lacks facilities for their care; and,

WHEREAS, the parties hereto desire to coordinate a program of rehabilitation of these animals by means of this Memorandum,

NOW, THEREFORE, it is mutually agreed and understood as follows:

Unless otherwise stipulated in this Memorandum, the Permittee may possess and provide care for sick, injured, or orphaned game birds, protected nongame birds, resident small game mammals, nongame mammals, furbearing mammals, reptiles and amphibians (no mountain lions, elk, adult deer, wild pigs, antelope, bighorn sheep or bear "big game mammals" can be rehabilitated under this permit) pursuant to Section 679 Title 14 California Code of Regulations (CCR); the Third Edition 2000 National Wildlife Rehabilitation Association/International Wildlife Rehabilitation Council Minimum Standards for Wildlife Rehabilitation; and the conditions listed below. Wildlife caging shall comply with the 2000 Wildlife Rehabilitation and Care Standards. Copies of sections 679, Title 14, CCR and lists of fully protected, threatened and endangered wildlife species are attached and become part of this Memorandum.

native fawns and immediate transport shall be arranged to send the fawn back to the original state where it came from or humanely euthanized. Any deer fawn brought to a rehabilitation facility from out of the area (including out-of-state deer fawns) shall be reported to WIL within 24 hours, including its site of origin. Fawns requiring long term "hands on care" due to a serious injury shall be euthanized instead of rehabilitated to avoid habituation and potential public safety issues.

7. Fawns shall not be rehabilitated at a facility that has permanent captive deer residing at the facility.
8. The Permittee shall not trade, transfer, or donate any wildlife or carcasses or parts of wildlife possessed under the privileges of this Memorandum without first receiving approval from the Department. Wildlife temporarily possessed for rehabilitation, excluding deer, may be transferred to another facility possessing a current MOU for treatment of injury, disease, or other conditions requiring temporary maintenance and care. (Eagle carcasses or parts shall be sent to the U.S. Fish and Wildlife Service National Eagle Repository; R.M.A- Building # 128, Commerce City, Colorado, 80022, attn: 'Eagle Lab'. Arrangements can be made by calling (303)287-2110.) Wildlife carcasses or parts obtained under this MOU cannot be kept unless authorized by the Department or appropriate permits are obtained. If a Salvage Permit is obtained through the United States Fish and Wildlife Service, migratory bird carcasses may be kept and used according to permit conditions/regulations .
9. Wildlife carcasses may be disposed of by burial, incineration, used as food for other wildlife, or by other means as approved by the Department. Disposal of wildlife carcasses shall be in accordance with local city or county codes.

RELEASE OF WILDLIFE

10. Upon the recovery of a sick or injured wildlife specimen, or determination that an orphaned specimen is ready for release, the Permittee is authorized to release the animal in a suitable habitat immediate to the area where found. Immediate area is defined as being within a three-mile radius of the site where the individual animal was found unless inappropriate due to urbanization or other imminent threat to wildlife. If there is no suitable habitat in the immediate area where found or if that area is unknown, the Permittee may contact a Department biologist for location approval prior to release of the wildlife specimen. Captive raised or bred reptiles and amphibians shall not be released to the wild. Game and nongame birds may be released in any suitable habitat. The release of any wildlife on private property requires permission of the landowner. The release of wildlife on U. S. Forest Service, National, State, County, or City Park, or State reserve property requires the permission of the State or Federal agency whose responsibility it is to oversee that property.
11. Opossums, eastern gray squirrels, red fox squirrels and starlings, although not native to California, may be rehabilitated and released pursuant to the

- c. Unless otherwise authorized by the Department, only nongame birds, furbearing mammals, nongame resident small game mammals, reptiles or amphibians shall be used for education.

EDUCATIONAL WILDLIFE APPROVED BY THE DEPARTMENT PRIOR TO 2012
AND HELD UNDER A WILDLIFE REHABILITATION PERMIT

- 15. All non-releasable wildlife shall be maintained in accordance with the caging and care provisions listed in sections 671.2 and 671.3, Title 14, CCR unless otherwise authorized by the Department.
 - a. Exhibitors, including wildlife rehabilitation organizations, wishing to use wildlife for educational purposes must be either licensed or registered as an exhibitor by the U. S. Department of Agriculture (a "licensed" exhibitor is one receiving compensation; a "registered" exhibitor does not).
 - b. Educators shall display animals while maintaining a reasonable distance between the audience and the animal (a minimum of four feet is recommended). The educator shall maintain control of the animal at all times during exhibition.
 - c. Gloves shall be worn when displaying raptors or mammals.
 - d. The public shall neither be encouraged nor allowed to come into contact with live animals.
 - e. In a continuing effort to maintain dignity to wildlife, educators shall not use display techniques that promote a "pet" type of relationship between the handler and the animal (i.e., refer to the animals using endearing terms like "cute", or allow animals to crawl or climb on the handler or in the clothing or pockets of the handler).
 - f. Any photographs of educational wildlife on brochures or websites, etc. cannot portray the animals as "pet-like"; inside homes, playing with toys, displayed with domestics, eating unnatural foods, etc.

ANNUAL REPORTS

- 16. The Permittee shall provide the Department with an annual report that is due by January 30th of each year. If annual reports are not submitted by January 30th of each year, this MOU will automatically expire. The annual report shall contain the following information listed below:
 - a. A complete list of all wildlife received by the Permittee during the reporting period. The report shall include a statistical summary of all the "required information" as stated in the minimum standards for

access to emergency medical supplies, access to emergency food and water for animals being held under the wildlife rehabilitation permit.

22. It is the responsibility of the permittee to be aware of city and county ordinances relating to wildlife care and housing. If required by their city or county, facilities must obtain proper permits to conduct wildlife rehabilitation at their facility. This MOU does not allow the permittee or any volunteers to violate any city or county ordinance.
23. Wildlife temporarily held for rehabilitation must be maintained separate from facilities housing domestic animals. For the purposes of this memorandum, a "facility" is considered a location or satellite branch (volunteer's residence) where wildlife is possessed under the conditions of this Memorandum.
24. In those situations where wildlife is maintained at a facility that possess domestic animals, wildlife enclosures shall be constructed to include visual and physical barriers (minimum of 48 inches in height) that protect the wildlife from domestic animal exposure. Wildlife shall also be furnished with species-specific hiding areas, within the enclosures. If wildlife is maintained indoors, within a permittees or volunteers personal residence, the wildlife shall be maintained in a separate room inaccessible to domestic animals. Such wildlife shall have minimal direct human contact. Every effort shall be made to prevent imprinting/ habituation.
25. Individuals who are not an official volunteer/member of a Department-approved wildlife rehabilitation organization shall not be allowed to physically handle wildlife.
26. Wildlife rehabilitation records shall be kept and available for inspection for five years following the end of the calendar year covered by the records. Complete and accurate records of all wildlife received, including the date received type of injury or illness, disposition, and date of disposition. After five years the permittee may dispose of wildlife rehabilitation records.
27. Permittees may not retain any animal obtained under this permit for more than 180 days without additional authorization from the Department's Wildlife Rehabilitation Coordinator.
28. All permittees who care for/ rehabilitate migratory birds must have a valid Federal Migratory Bird Rehabilitation Permit issued by the United States Fish and Wildlife Service.
29. It is recommended that all persons working under this Memorandum who handle any rabies vector species receive appropriate pre-exposure rabies vaccinations as recommended by the United States Department of Health and Human Services Center for Disease Control.
30. All paid staff members and volunteers who handle and provide care for wildlife, under the privileges of this Memorandum, shall receive Department-approved annual training as described in Section 679 of the California Code of Regulations, Title 14. It shall be the responsibility of the Permittee to

This Memorandum is valid until May 5, 2017, unless revoked prior to that date. The agreement may be revoked upon the request of the parties signed hereto or upon a finding by the Department that the Permittee, or any representative, has not complied with the terms and conditions of the agreement. Upon cancellation of this agreement, all animals possessed under the privileges of this Memorandum shall be transferred or humanely euthanized as directed by the Department.

The Permittee agrees to indemnify, defend and save harmless the State, its officers, agents, and employees from any and all claims and losses accruing or resulting to any person or property in connection with the performance of this Memorandum.

This Memorandum has been executed by and on behalf of the parties hereto as to the day and year first written. The Permittee is responsible for notifying the Department in writing within ten days if a change in address or wildlife rehabilitation director or president occurs. The notification shall include the name of the person who will be replacing the original signer of this agreement and becomes part of the original Memorandum.

By signing this signature page the permittee is agreeing to comply to all of the conditions in this MOU and with the provisions of Section 679, Title 14, of the California Code of Regulations.

Nicole Carion 5.5.14

Nicole Carion Date
Wildlife Rehabilitation Coordinator
Wildlife Investigations Lab
CA Department of Fish and Wildlife

Mary Cronin 2-18-14

Permittee Signature Date
Mary Cronin

Print Name
Animal Advocates

Organization Name

45. Yellow-cheeked Chipmunk (*Tamias ochrogenys*)
46. Sonoma Chipmunk (*Tamias sonomae*)
47. Merriam=s Chipmunk (*Tamias merriami*)
48. California Ground Squirrel (*Spermophilus beecheyi*)
49. Douglas= Squirrel (*Tamiasciurus douglasii*)
50. Northern Flying Squirrel (*Glaucomys sabrinus*)
51. Pine Squirrel (*Tamiasciurus douglasii*)
52. Gray Squirrel (*Sciurus carolinensis*)
53. Western Gray Squirrei (*Sciurus griseus*)
54. Red Fox Squirrel (*Sciurus niger*)
55. Raccoon (*Procyon lotor*)
56. Weasel (*Mustela frenata*)
57. Mink (*Mustela vison*)
58. Badger (*Taxidea taxus*)
59. Striped Skunk (*Mephitis mephitis*)
60. Western Spotted Skunk (*Spilogale gracilis*)
61. Gray Fox (*Urocyon cinereoargenteus*)
62. Coyote (*Canis latrans*)
63. Bobcat (*Felis rufus*)
64. Deer (*Odocoileus hemionus*)

Appendix C

PROCEDURES FOR FAWN REHABILITATION

Marjorie Davis

GENERAL DISCUSSION. This protocol is tailored to fawns only. On occasion we are able to get an adult on its feet and back into the wild, but this is not the focus of our facility. It takes inner-strength, and a complete understanding of the species to raise fawns 'wild' and to make difficult, but necessary, decisions on their behalf. Wildlife is under stress the entire time it is in captivity. Stress kills. Fawns easily succumb. Fawns are genetically programmed to be wild. Do not deprive them of this wildness. They must not be thought of as cute, cuddly pets. They are prey animals. Therefore, the greatest gift we can give them is to allow them to retain their natural fear of predators, which includes man. Do not permit them to think of us as friends. We are not. The fawn facility shall not be open to the public. All human contact shall be kept to a minimum during the months a fawn is in captivity and during its release back into a natural habitat.

NATURAL HISTORY. Mule and Columbian black-tailed Deer are the predominant deer of California. A Black-Tail's life is spent among dense shrubs and forests, in contrast to the open country of the Mule Deer. In 1986, when we received our first fawn, there were no guidelines, or any written material available for the rehabilitation of this species. After many years of hands-on learning, success' and failures, and detailed record keeping, Fawn Rescue compiled and published a comprehensive Fawn-Care manual. This manual, 'The Black-Tailed Fawn - Care In Captivity', contains natural history, maps, drawings, diagrams, biological data and a complete guideline for the care of fawns from rescue to release. As we continue to learn, this manual is updated and revised. It is strongly recommended that this manual be followed as a guide to the understanding and rehabilitation of fawns.

DEVELOPMENT OF PROCEDURES. THINK WILD. This is the basis for each step we have taken in compiling the following procedures. Mandatory procedures are underlined, others are ones that we strongly recommend. It took many years of success, failure, adjustments and complete revisions to develop procedures that work. Our facility deals with over 100 fawns yearly. Each fawn's circumstances are different, and sensible decisions must be made according to their individual needs.

RAISING ORPHANED, ILL, OR INJURED FAWNS

SCREENING CALLS. It took many futile trips, in answer to 'rescue' calls, to learn that there are times when the caller can, and should, handle the problem without our help. Now we ask questions and explain what responsibility is ours, and what is theirs. We do not relocate 'unwelcome' deer. We no longer dash madly around a fenced back yard trying to run down a healthy fawn, often injuring it in the process. We advise the caller to open the gate, place water a slight distance outside the fence as an enticement, leave the area, and allow the animal to escape without the stress of the chase. When the problem is an injured or ill fawn, ask the caller to leave the fawn completely alone until you arrive. Moving an injured fawn, holding its head on one's lap, the human touch, the sound of a human voice can throw an alert but injured fawn into shock and does nothing to 'comfort' it. To the troubled fawn, we are a predator. It cannot understand that we are there to help.

RESPONDING. Use an enclosed vehicle having a divider between the driver of the vehicle and the animal. Do not transport a fawn in the back of an open truck, nor on the seat of a passenger car. Rescue calls are always emergencies. Keep the rescue vehicle fully equipped so valuable time is not lost. Carry a small plastic animal carrier, with a blanket on

Therefore, the ideal release is directly from the enclosure where they are raised. This is a goal worth striving for and is not that difficult to accomplish. We advertise for homeowners to help in fawn-care, with great results. The homeowner-volunteer builds an enclosure on their large, remote acreage. Four fawns are stabilized at our facility, then transferred to this out-shelter where they are raised until they are ready for release. The gate is opened and the four fawns are free to live in the surrounding, familiar territory since this is not always possible we must prepare the fawns for the transition from captivity to freedom. These enclosures shall be as wild and natural as we can provide. A facility that has no natural area in which to raise fawns 'wild' shall not attempt the rehabilitation of fawns. Transfer these fawns to a facility in your region that is better equipped for raising fawns.

Erect the enclosure in a wooded area containing rocks, logs, hilly areas, with brush for hiding and browsing. Leave it natural. Only remove sharp objects that might cause injuries. The enclosure shall be large enough for unhampered running, jumping and a swift retreat from any disturbance. Shade is essential. Natural ground, as the substratum, keeps contamination to a minimum. A visual barrier, either natural, or installed, must keep the fawns from contact with humans and domestic animals. Bamboo fencing works well, allowing light and air through, while providing a natural, flexible barrier. However, it's important that the fawns be able to look out into extended natural habitat and have contact with free-ranging wildlife when possible. The release of fawns into a wide open territory, after being raised in barracks-like confinement, is an overwhelming experience with they are not prepared to cope.

Enclosure materials: Fencing – 8' high (to protect from predators) small-mesh (ideal "2 x 2", maximum 2" x 4") galvanized wire fencing is suitable for protection and visibility. Gates with secure latches. A three-sided waterproof shelter constructed of plywood – 4' wide X 6' deep x 4' high. Leave the front completely open for quick exit. Feeding racks for bottles, attached to fencing, with a 12" space between each bottle hole. A water faucet, or automatic water system.

Minimum outdoor enclosure size for fawns: Neonates (4): 15'x20'x8'. Nursing (Spotted) (8): 50'x100'x8'. Juvenile (Unspotted) (6): 50'x100'x8'. The larger this enclosure is the better it serves our purpose in raising fawns 'wild'.

Feeding Racks: Racks permit the fawns to be raised healthy and wild. Nothing protrudes into the pen but the neck of the bottle and the nipple. Bottles are placed in feeding racks from outside the fence, so there is no need for humans to enter the enclosure.

NURSING / NUTRITION. Formula: Day One Formula 30/40 for Black-Tailed Deer, Manufactured specifically for the nutritional requirements of Black-Tailed fawns by Fox Valley Animal Nutrition Inc. Phone: 800-678-4666. Because of the high protein and fat content of this specialized formula, fawns thrive, eat less, and are more satisfied. Use standard eight ounce baby bottles and standard nipples. Enlarge the hole by cutting a ½" X through the nipple. A fawn will not nurse if it must struggle to suck. A complete feeding schedule may be found in Fawn Rescue's fawn-care manual.

Assign one care-giver to feed the fawns. Neonates will need help as they are introduced to the nipple, stimulated and cleaned. Do not talk or pamper these fawns as they are being attended. Within a few days well fawns are trained to feed at the bottle racks and will no longer need handling. This prevents imprinting. They must relate to each other, not to humans. Do not talk or make unnecessary movements while the fawns

the chute, close to the gate. Using several volunteers, walk slowly behind the group of fawns inside the pen, herding them toward the entrance to the chute. If this is done quietly, without alarming the fawns, they will run through the gate and into the chute. Close the gate quickly behind as many fawns as have run into the chute. You may not get them all on the first try and the ones left behind will be alerted and harder to herd. Two volunteers are needed inside the chute, one to pick up and carry the fawn and another to guard against the others escaping. Once they are confined in the chute don't stand still, keep moving in, don't hesitate. Catch them off guard as they hit into the wood panel, lose their balance, and are most vulnerable. The more quickly and quietly you work, the less problems you'll create. Grab the fawn from behind, keeping those hoofs away from your body. Keep control of the neck. Have a volunteer outside the gate to open the gate and truck hatch as you transfer it to the vehicle. Close the back quickly. Repeat with each fawn, taking care not to open the vehicle hatch too far allowing the first to escape. This can happen. They will all be transferred within minutes. Be prepared to leave at once. Some fawns may jump around in the vehicle at first but will not injure themselves. Once the vehicle begins to move they will lay down. It is not necessary to black out windows. It's important to drive right to the water source, if possible. Open the back, stand quietly to the side and allow them to exit.

CONCLUSIONS. Every fawn is received due to human interference. It is our deep obligation to correct this wrong by caring for and returning them back into the wild where they belong. Some will not survive. If we have done our job well, in the THINK WILD mode, most of them will. Our rewards are in knowing we made the effort, and in watching them bound away to freedom.

ecosystems, has led to a desire to help these animals. Today, it is not uncommon for bats to be brought into wildlife centers by people who expect the animals to receive the same level of care as any native wildlife in need of attention. And, just as the public's interest in bats has grown in recent years, so has the amount of information available about bats. Today, as one scrolls through the internet, one finds many websites dedicated to bats and their rehabilitation.

It is important to note that, although a great deal of knowledge has been gained about bats in recent years, bat rehabilitation is still in a relatively early stage of development. Unfortunately, this creates an arena in which there are still many opinions about what is the best procedure for individual animals. To this end, the following guidelines have been gathered and compiled into this format at the request of the California Department of Fish and Game's Central Coast Region. These are procedures that the California Bat Conservation Fund has developed over several years through trial and error and with the assistance of Dr. Scott Sims, a veterinarian, and Drs. Elizabeth D. Pierson and William E. Rainey, both bat biologists with the University of California at Berkeley. One procedure that cannot be under emphasized is the need for all rehabilitators handling bats to have their rabies vaccinations up to date. NO rehabilitators without this protection should handle a bat at any time.

REQUIREMENTS FOR BAT REHABILITATION: Wildlife rehabilitation facilities shall assign one bat team leader and assistants who are vaccinated for rabies to care for all bats accepted into the facility. These shall be the ONLY people handling bats. All care people handling bats *must* have their rabies immunizations and be current on their rabies boosters. Bats should not be handled or cared for by rehabilitators out of this group, but should stay with their initial care person and their assistants until they are released or transferred. Bats may be transferred from one location to another by an unvaccinated rehabilitator, but it must be understood that the bat will be placed in an escape proof cage for transport and under no circumstances be taken out of this cage or handled during transport. If a rehabilitation facility has no veterinarian available that is adept at pinning wing fractures, transfers should be made immediately to a facility that has a veterinarian willing to surgically pin the wing, or perform any surgery or major procedure. External Splinting or gluing of the wing will result in a non-releasable bat except for the very rare "greenslick" fracture.

Any bat found on the ground must be handled as a potential rabies contact. Handlers should be alert for any CNS symptoms in a bat, although rabies may show symptoms other than CNS problems. Bats that show symptoms of rabies shall be euthanized immediately. Under NO circumstances shall wildlife rehabilitators or phone volunteers offer health advice to individuals who are concerned regarding potential exposure to rabies. Individuals who are concerned about contracting rabies should be advised to consult their physician.

Bat rehabilitators shall use either gloves or a wrapping cloth when handling bats. A terrified bat will try to bite. Letting the bat chew on a piece of cloth will often keep the animal distracted while it is being handled. Another technique that works well is to cover the bat's head with a soft cloth during handling. Utilizing this method will help keep the bat calm and also help prevent the handler from being bitten.

Adult bats brought in with injuries may be released as soon as they have recovered and are capable of sustained flight (5-15 minutes in the air without the need to land, depending upon species). Any facility that accepts bats for rehabilitation shall have one or more flight cages or an escape proof room available for exercising bats several times a week.

SCREENING CALLS: It is imperative that all information regarding the finder of the bat be recorded. The name, phone number and address of the finder should be documented and maintained with the bat's records, along with the exact location where the bat was found. Callers should be informed of the risks of handling bats with their bare hands. Bats that have bitten people or pets or had any contact with children shall not be accepted for rehabilitation. Refer the finder to the Dept. of Health Services or the local Animal Control agency in their area to test the bat for rabies. Any bat that has bitten a person must be destroyed immediately and

the guts "toothpasted" (squeezed) into the bat's mouth, which will normally be open in a defensive posture when the bat is first handled. Once the bat realizes that the mealworms are food, they should be encouraged to chew the entire mealworm. Some species of bats learn to eat from a shallow dish left on the bottom of their cage very quickly. Other bats may never learn. It is suggested that forceps be used to offer mealworms so that bats do not associate feeding with human hands and become dependant upon being hand fed. Do not feed a bat mealworms before being taken to the vet for pinning; their stomach should be empty before anesthesia is administered. After the first feeding the bat should be introduced to a small holding cage with soft non-terry type material on the bottom and draped over the sides of the cage in a way that allows the bat to crawl underneath the material to hide. A shallow dish of water and a dish of mealworms may be left close to or underneath the cloth where the bat chooses to hang, and a heating pad set on low should be set on the side and over the top to encourage the bat to hang normally. The cage should be placed in a quiet, dark room where no potential predators are housed or reside (i.e., owls, other raptors, rats, domestic cats or dogs) so that the bat can rest with a minimum of stress.

Most crevice dwelling bats learn quickly to walk down to the bottom of the cage or to a shelf and eat out of a shallow dish. Water can also be offered in shallow dishes. Baby food jar lids or shallow plastic lids make acceptable dishes. Cracking mealworms just behind the head will disable them so that they cannot escape from a shallow dish. After a bat becomes used to eating out of a shallow dish they can then be offered deeper dishes that do not allow mealworms to escape and cracking the mealworm's neck may be discontinued at that time. An occasional bat, and a sizable percentage of Mexican free-tail bats, will not learn to eat on their own and must be hand-fed for their entire stay in captivity. Many pallid bats will become ill on a constant mealworm diet and should be fed domestic crickets. All insects being fed to bats must be kept in a nutritious, mold-free medium (wheat bran, grain, cereals, etc.) and should be dusted with a powdered vitamin/mineral supplement, such as Vionate™ before being offered to the bats. Most bats can be offered free choice of insects, but some bats, especially pallid bats, may become obese if offered an unlimited supply of food. All bats in captivity should be weighed regularly to see if their food should be limited or more should be offered. Bats normally gain up to 1/2 again their normal weight in the fall to prepare for hibernation and should not have their food limited for this natural seasonal response.

RAISING INFANT BATS: Conventional wisdom has always decreed that bats hand-raised from infancy cannot be released. However, recent studies have shown that hand-raised colonial bats are capable of surviving in the wild if released back into their own or conspecific colonies in a careful, well thought out manner. More studies are now under way to study the survivability rates of hand-raised bats. It is becoming increasingly apparent that orphaned, colonial bats are suitable candidates for release as soon as they become adept at flight. No evidence is yet available, pro or con, regarding the survivability of solitary species that are hand-raised and then released.

Infant bats weighing less than one gram for smaller species (i.e., myotis species), or 3-4 grams for larger species (i.e., big brown, pallids), need to be fed every two hours day and night. Infant bats weighing between 1 and 3 grams for smaller species, and 5-6 grams for larger species, should be fed every three hours. Infant bats will need to be fed during the night until they are approximately 3 week of age. They can then be introduced to mealworms and weaned from formula gradually over a period of two weeks. Check with your local bat specialist for formula suggestions. Do NOT use Esbilac™ puppy formula as it may cause severe metabolic bone disease in infant bats. Infant bats should be kept in a somewhat warmer environment than an adult bat, but care must be taken to not overheat them. Always have a space in their container where they can roost to avoid excessive heat. Check them every hour or so, and if they are found hanging from the screening on the top of the container, it is probably too warm. Experiment with heating pad placement until you become adept at keeping a comfortable temperature available at all times. It is very important for infant bats to be raised with other infants, preferably their own species. Transferring infants to a rehabilitator who can raise it with others of its own species is preferable to raising it alone.

cage. A range of temperatures should be offered by placing a heating pad sent on low and top and down one side of the cage, allowing the bats to enter torpor by choosing a lower temperature. Foliage roosting adult bats do not normally need heating pads and will actively avoid them. The exception to this are injured bats, which should be kept in a warm cage (approx. 80° Fahrenheit) during the entire time they are recuperating, as a torpid bat's tissues will not heal. The cages should be escape proof and capable of being sterilized after use. We find that Rubbermaid Tuff Totes™ in various sizes, available at hardware and drug stores, make excellent cages for injured bats and for transport. They are escape proof and can be easily sterilized and stacked when not in use. The one caveat is that care must be taken to insure that the bat's toes are not accidentally caught by the lid when it is snapped on. The middle of the lid should be removed and replaced with chew proof netting for ventilation. Hot glue guns are used to affix the netting to the top and sides of these cages.

Bats that are capable of flight should be housed in a flight cage large enough for the bat to attain speed while flying. The flight cage should have appropriate roosting areas, either material draped over a heating pad for crevice dwelling bats, or foliage arranged at the top for Lasiurine (foliage roosting) bats. All cages must be escape proof. Small bats can squeeze through a hole or crack that is 3/8 inch wide by 1 1/2 inch long. The new energy saving fluorescent light bulbs stay cool and allow enough light for handlers to care for the bats without getting so hot that the bats might accidentally burn themselves brushing against the light.

FLIGHT CAGE SIZES AND CONSTRUCTION: Flight cage sizes may vary depending upon the size and species of bat. Bats with low wing loading aspects have a slow, fluttery flight better suited to hunting in cluttered habitats. These bats can fly quite well in a flight cage of 6' X 6' X 8'. Bats with long, narrow wings, i.e., the free-tail bats, hoary bats, and some myotis bats, have a high wing loading aspect and must have a larger flight cage to attain the speed necessary for flight. These bats often migrate long distances and need to spend much of their time aloft in the wild. Bat rehabilitators should be familiar enough with bats to be able to identify which species will need larger cages. We have used flight cages of 9.5' X 4.5' X 8' to successfully teach free-tails to fly well, but ideally a 20' X 8' X 8' cage should be used whenever possible. Bat flight cages should be constructed of untreated wood frames with plastic netting. The plastic netting should have no more than 1/4 or 1/8 inch openings. Bats can damage their wings by accidentally slipping a wing through larger openings. (Netting may be purchased from Internet Inc. 1 (800) 328-9456). Hardware cloth is not recommended. Fiberglass screening is acceptable for temporary caging for some species of bats, but tears easily and can be chewed through in a few minutes by the larger bats, allowing them to escape. Juvenile bats should be started out in a cage no more than 3' X 4' X 4' for flying until they are capable of landing safely (usually in about 1 week). Starting juvenile bats out in these smaller cages will avoid most first-flight type injuries.

RELEASE: Bats should be released back into the area where they were found as soon as they are capable of sustained flight demonstrate the ability to gain altitude during flight, land well, and the weather permits. Bats should not be released when storms are forecast or temperatures drop to near freezing. Small, solitary bats such as *Myotis californicus*, or bats that have had serious injuries, should be over-wintered until spring arrives and insect populations are up. If the bat is a juvenile and the maternal colony's location is unknown, the juvenile bat should be released into a nearby conspecific colony. Communicate with bat biologists in your area to determine where these colonies may be found. Colonies often migrate unexpectedly due to shifting insect populations, changes in the weather, or disturbances. It is important to determine that the colony is actually present BEFORE releasing juveniles into that location. Solitary bats can be released at dusk into the general area where they were found. All bats should be released at dusk so that their flight can be followed visually and the bat picked up quickly if it drops to the ground. Cold, torpid bats are incapable of flight. Make sure the bat has adequate time to warm up before release. CBCF uses heating pads with adapters for automobile cigarette lighters; this insures that the bat will be warmed and ready for release by the time you reach your destination.

Do bats attack people?

Bats do not attack people or get "stuck" in their hair. Bat researchers, who often must work very closely with bats, are never attacked by them, no matter what the provocation. But bats, like any wild animal, will bite in self-defense if they are picked up or handled. The smaller bats will often fly close to your face because they are hunting the mosquitoes that are attracted to human breath. The mosquitoes, on the other hand, ARE attacking and biting you.

How do we get rid of a colony of bats in our house?

As their natural habitat becomes destroyed, bats often move into the attics, eaves or walls of houses and other structures. Unless the numbers of bats are very large, most homeowners are unaware that bats are using their house as a day or night roost. Bats can be humanely evicted during the early spring and late fall; they must NEVER be evicted during nursery season (early May through September), as the babies will be unable to fly away with their mothers. Humane evictions consist of hanging nets over the exit holes, making a type of one way "doggie door" that is left up for a week or so until it is certain that all bats have left. The entry/exit holes can then be permanently sealed. Using poisons on bats is illegal in California and most other states as this practice has been shown to be extremely dangerous to humans and has actually made some houses uninhabitable. "America's Neighborhood Bats", by Merlin Tuttle, University of Texas Press, soft cover (about \$9.00) has an excellent chapter on humanely excluding bats and instructions for placing nets. The nets should be placed over the exit holes and nailed or fastened on the top and sides, but left open at the bottom with the bottom edge hanging approximately 18 inches below the exit hole. Fiberglass screening, available at any hardware store, is an acceptable material for netting. Bats sometimes congregate in the ceiling or on walls of porches at night. This called a "night roost" and is made up of bats that are out hunting insects. These bats can be discouraged from roosting in unacceptable locations by placing a small fan directed toward the bats and leaving it on a high setting for several nights.

Aren't bats just rodents?

Bats are not related to rodents. They are actually more closely related to us than they are to rodents. Bats do not chew wood or insulation. They live up to 30 years or more and reproduce very slowly; most bats have only one offspring per year. Bats are not considered vermin, and are crucial to a healthy environment. They are considered keystone species in many ecosystems, meaning that many ecosystems would crash if bats were removed. In California, bats are very important for mosquito and insect crop pest control.

Can I keep a bat as a pet?

It is illegal in California and other states to keep wild animals as pets, even for a few days. Bats do not do well in captivity and will die quickly if they do not get the proper diet and care. Another important consideration is that any bat that is easy to catch may be sick with rabies. For your safety as well as the bats', bring it to a wildlife rescue center immediately.

References

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and a good pair of gloves. (Very few gloves will protect you from the bite of a coyote but they will reduce some of the damage).

EVALUATION. Upon arrival at the scene, take a moment to assess the coyote and its immediate surroundings. Is there an obvious injury that you may need to "favor" during the capture? What is the animal's demeanor? Is it alert? Will it attempt to move or drag itself away from your approach? Plan your approach from a direction that will keep the coyote from entering any roadway and, if possible, will drive it toward a natural or man made barrier thus slowing its progress and enhancing your chances of quick capture.

CAPTURE/RESTRAINT. Use your net or catch pole to achieve capture of the coyote and then utilize whatever method necessary to maneuver it into your carrier. If you must make direct contact to achieve this, and regardless of the coyote's demeanor, anticipate that it will render a defensive bite and execute your movements accordingly. Do not be a hero! Do not allow yourself to receive a bite!

PHYSICAL EXAMINATION. This must be conducted in a dispassionate manner with one view only! What is the potential for this animal to be repaired, restored to it's original condition and released? Many veterinarians will be focused only on the potential for repairing the animal and will not be thinking about the animal's need to survive in the wild. You must be the more pragmatic one and be willing to make the hard decisions.

- If the injury experienced by the coyote will leave it with even the slightest disability, the coyote shall be immediately euthanized.
- If surgery is indicated and being considered, is the veterinarian "reasonably" confident that it will be successful and will leave no disability? If not, the coyote shall be euthanized.
- If the coyote has a fracture in two or more legs, and regardless of how repairable they may be, the coyote shall be euthanized. (Almost impossible for a leg fracture to heal unless the animal has "three good legs" upon which to maneuver and support it's weight).
- Surgery referred to as an FHO (Femoral Head Osteotomy) should not be conducted due to the extended healing time necessary and the poor potential for proper false joint growth. (Unlike the domestic dog, The coyote will panic when you enter for cleaning, etc. and will place excessive stress on the joint under repair).
- If a fracture will require a KE (external fixation device), surgery shall not be undertaken unless the rehabilitator has the means to house the coyote in a situation which will have neither chain link, welded wire nor any other object upon which the KE might catch and be ripped out.
- If there is a preponderance of evidence, either circumstantial or actual, that an injured coyote you received was responsible for predation of any domestic animal, that coyote shall be euthanized without regard to the extent of injuries.

HOUSING. The minimum caging guidelines established IWRC & NWRA shall be met and preferably exceeded. Following are additional coyote housing requirements:

- Construction must be of 11 gauge, or stronger, chain link or the equivalent gauge welded wire.
- If chain link, the clamps holding tension bars to vertical posts should be bolted from the inside with the nut on the outside. (Reduces possible injury from protruding bolt).
- Enclosures must have fully secure roof of solid material, chain link or a combination of both.
- Enclosures must have wire under the ground connected to the vertical perimeter wire, or footing, or either concrete or wire, connected to the perimeter wire and extending a

HOUSING. Same requirements as "adult coyotes" with the following additions:

If coyotes frequent your property, enclosures housing pups must be augmented with a tight mesh welded wire or even "chicken wire" extending from ground level to three feet high around the entire perimeter of your enclosure. (Upon seeing the approaching adult coyote, a pup will see it as its mother and will extend its forearm through the chain link. The adult coyote will see the pup as an intruder and will violently rip the pup's arm off through the wire.)

Where possible, a "feeding slot" should be built into a selected area of the enclosure perimeter. That area should then be secured from view, without seriously hindering proper ventilation, so that food will "mysteriously" appear through the slot, falling into a feeder, without the pup(s) seeing the approach or presentation of food by a human.

GENERAL.

With the exception of quarantine periods, which should not exceed 14 days, under no circumstances will a coyote pup be raised alone!

Coyote pups shall not be "wintered over" for release the following spring.

Coyote pups with injuries that would require orthopedic surgery shall be euthanized.

RELEASES. This is the final but most dilemma-ridden facet of raising coyote pups. There are options for release but, before selecting one, consider the following:

Numerous field studies have documented the "average" dispersal age to be 10 months. The youngest documented dispersal was a male pup who began dispersal behavior at 7 months and achieved complete dispersal 3 weeks later. (This particular study did not utilize telemetry. No data was available on the survival of the "early disperser"). Since we would loath to release captive raised pups in the "dead of winter", a release earlier than normal dispersal age is the only viable choice. Best advice is to allow the pups to reach maximum possible age while keeping a close eye on your "weather window". Release the pups prior to the development of "repeated" inclement weather.

A very strong "bonding" will develop among captive raised pups. While this bonding cannot be discerned with a human in proximity, as the pups 'should' be scared and frantic, the use of binoculars to conduct surreptitious observation will make the bonding highly evident. Splitting up pups who have been "friends" for months would be devastating to their psyche and would probably reduce survival potential. Release together, bonded pups will remain together at least until reaching reproductive age. The strengths and adeptness of one will help offset the weaknesses of another. Survival potential will be increased.

RELEASES OPTIONS. While fully considering the above items, following are some options for release:

Develop a relatively non-invasive method of marking individual pups upon arrival. At release time, return each pup to the area from which it originated. (While biologically sound, this option is not fully conducive to survival potential unless, by slim chance, the pup encountered its mom and siblings, if alive, and scent recognition was achieved before the pup was driven out of the area.)

Release all pups in the same location at the same time. Release location could be that from which one of the pups originated. If this is done, select that location with minimal human residences. Only downside of this choice would be the number of pups in the group. For example, if you were to release 6 or more pups in an area, that sudden infusion of coyotes might put tremendous pressure on an area that may

- already be at carrying capacity for the species.
- Network with other rehabilitators within the region. Upon completion of quarantine periods, but before pups are commingled and begin bonding, execute transfers to ensure the each coyote rehabilitator, or each coyote enclosure, has at least 2 pups but not more than 4. A release of 4 or less would minimize the impact on the chosen release habitat.

CONCLUSION. The release of a now healthy adult coyote back to his/her original habitat can be an extremely rewarding experience. This coyote was already surviving and had the misfortune of getting injured. Your efforts restored this animal to its original condition and allowed it to continue its life. Your efforts at raising coyote pups will not be quite as rewarding. There will be losses. Learn to cope and get over it. Recognize that not all of your pups will survive after release. Even those raised by their mothers have a relatively high "natural" mortality rate. Recognize that you can in no way compensate these pups for all that they "would" have learned from their mothers. With this in mind, do everything within your power and imagination to ensure that these pups are raised wild and free of human imprinting. These efforts along will significantly increase their survival potential.

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minimum of 12 inches beneath ground level.

- Enclosure must be equipped so as to provide an area of protection from the direct sun and inclement weather. Enclosures should be properly habituated to provide for the coyote's need to remain from view and hide during enclosure cleaning, etc.
- Domestic dogs must not be in areas housing coyote enclosures! If neighbors have dogs, there must be a visual barrier between them and coyote enclosures.

NUTRITION. Highly diversified nutritional habits can best be identified from research on appropriate web sites. With this information, an assorted diet can be reasonably achieved. Every effort shall be made to minimize or eliminate the use of dry dog food! Contact the nutritionist at your local zoological facility. There are commercially prepared foods available that fulfill all nutritional requirements, do not resemble dry dog food and are usually far less expensive than a good quality dry dog food.

RELEASES. Upon full recovery from injury/illness, adult coyotes must be released in the area within which they were found! There shall be no exception to this policy! For coyotes, a release point can be up to 2 miles from the point of origin as long as the two points are not fragmented by a major highway or large residential community. If there exists an extremely compelling reason why an adult coyote should not be returned to its original habitat, the coyote shall be euthanized. Under no circumstances will adult coyotes be relocated!

RAISING COYOTE PUPS

NURSING. Coyote pup's eyes open at approximately 14 days old. This is also the age when they cut their upper and lower canine teeth. Upper and lower incisors are cut by 16 days. At 21 days they will begin to eat semi-solid food regurgitated by the mother. Full weaning begins at 28-30 days and is fully achieved by 37-40 days.

- If nursing an "eyes-open" pup, create some type of a curtain barrier that allows you to see what you are doing without the pup seeing your face.
- Begin a weaning process, with semi-solid food, as early as possible. The quicker the pup is weaned, the less handling is required.
- Nursing (bottle feeding) must be done in a dispassionate manner. The pup shall be placed on a clean surface in the same position as if nursing from its mother. Never hold a pup in your arms for nursing. While the pup must be held in the proper nursing position, it must never be stroked or otherwise physically comforted.
- When completed with nursing and stimulation, as necessary, for waste elimination, immediately place the pup back in its quarters and ignore it until next feeding time.
- Never talk to, or otherwise attempt to verbally comfort a pup. Do not engage in conversation with others while nursing or in proximity to any pups.

QUARANTINE. Quarantine of individual pups or litters, prior to any commingling, is optional but is recommended. If done, quarantine time should never exceed 14 days.

NUTRITION. Same as "adult coyotes" with emphasis placed upon the need to avoid dry dog food/puppy chow. In addition:

- Containers used for food should be self-constructed or of a type that would not normally be seen in a yard housing a domestic dog.