



CRUEL & INHUMANE: DOG RACING IN FLORIDA

Overview

There are currently twelve operational dog tracks in Florida.



1. *Daytona Beach Kennel Club & Poker Room (Daytona Beach)*
2. *Derby Lane (St. Petersburg)*
3. *Ebro Greyhound Park (Ebro)*
4. *Flagler Greyhound Track (Miami)*
5. *Mardi Gras Gaming (Hallandale)*
6. *Melbourne Greyhound Park (Melbourne)*
7. *Naples-Ft. Myers Greyhound Track (Bonita Springs)*

8. *Orange Park Kennel Club (Orange Park)*
9. *Palm Beach Kennel Club (West Palm Beach)*
10. *Pensacola Greyhound Track (Pensacola)*
11. *Sanford Orlando Kennel Club (Longwood)*
12. *Sarasota Kennel Club (Sarasota)*

Thousands of Dogs Endure Lives of Confinement at Florida Racetracks



At Florida tracks, greyhounds are kept in warehouse-style kennels in rows of stacked cages, with shredded paper or carpet remnants as bedding. Greyhounds are normally confined in these cages for 20 to 23 hours per day.¹ As many as 8,000 dogs are housed in these conditions.²

The state currently has no rules or regulations governing turn out times, but does require dog track cages to measure at least two feet wide, three feet long, and thirty-two inches high.³ Large greyhounds cannot stand erect in these cages.

Inside a greyhound kennel at Daytona Beach Kennel Club. Photograph by the Florida Department of Business and Professional Regulation, 2011.

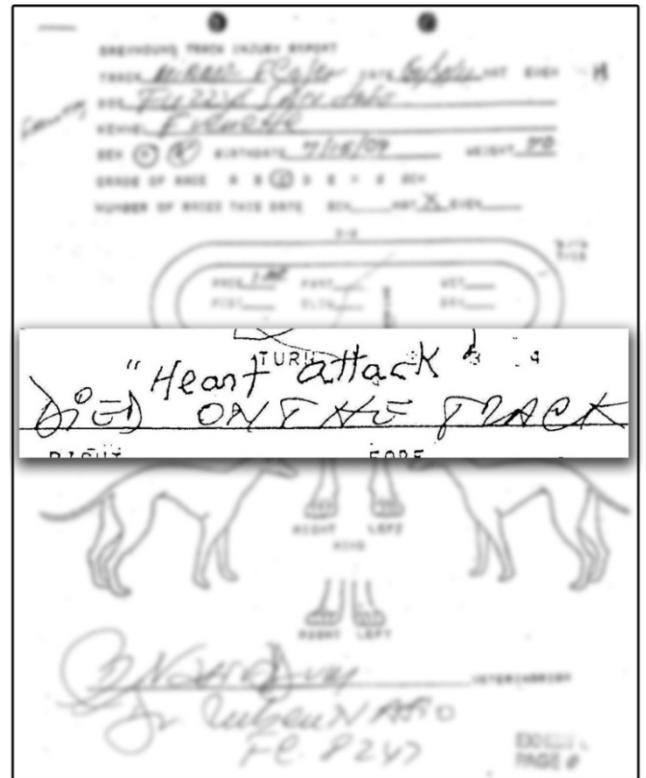
¹ Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering, *Investigative Report for Case No. 2006029115* (Tallahassee, FL: July 20, 2006).
² Stephanie Tinoco, "Organizations push to pass laws protecting racing greyhounds," *WUFT 5*, December 4, 2013, <http://www.wuft.org/news/2013/12/04/greyhound-racing/> (accessed February 14, 2014).
³ Jill Blackman (Chief of Operations for the Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering), letter to GREY2K USA, May 23, 2007; Fla. Admin. Code R.61D-2.2023.

Greyhounds Suffer Serious Injuries

Unlike most states with greyhound racing, Florida does not require tracks to report injuries to the public. Minimal injury data has become available through Florida Department of Business and Professional Regulation (DBPR) investigative files, death notifications, and inspection reports. An examination of these records identified 186 greyhound injuries between 2008 and 2014, including at least 124 dogs that died or were euthanized.

Injuries that have been documented include dogs that suffered broken legs, dogs that died from heart attacks and dogs that were electrocuted. For example:

- On May 21, 2014 a three-year-old greyhound named **Jiminy Landon** was euthanized after he fell and broke his back during a race at Derby Lane.⁴
- On February 28, 2014 a two-year-old red brindle greyhound named **WWW Ray of Grey** broke her leg during a race at Naples-Ft. Myers Greyhound Park.⁵ The track's veterinarian, Dr. Hakim Hamici, admitted that he left the facility when **WWW Ray of Grey** suffered her injury and needed his attention.⁶ Dr. Hamici was euthanizing another racing greyhound at his clinic across the street from the track at that time.
- On February 9, 2013 a twenty-three month old greyhound named **Raiders Uncle Mo** died after he fell into the racetrack rail at Sarasota Kennel Club and was electrocuted.⁷
- According to state records, twenty greyhounds were injured at Flagler between June 4, 2011 and July 24, 2011.⁸ At least fifteen of these greyhounds suffered broken legs.⁹ Additionally a greyhound named



Track injury report for Fuzzys San Jose, who died after suffering a heart attack at Flagler on June 4, 2011.

⁴ Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering, *Investigative Report for Case No. 2014021914* (Tallahassee, FL: Florida Department of Business and Professional Regulation, May 22, 2014).

⁵ "Dog Details of WWW Ray of Grey," *Track Info*, <http://www.trackinfo.com/dog.jsp?runnername=WWW%20Ray%20of%20Grey> (accessed July 25, 2014); Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering, *Facility Inspection* (Tallahassee, FL: Florida Department of Business and Professional Regulation, April 8, 2014).

⁶ Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering, *Facility Inspection* (Tallahassee, FL: Florida Department of Business and Professional Regulation, April 28, 2014).

⁷ Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering, *Investigative Report for Case No. 2013005735* (Tallahassee, FL: Florida Department of Business and Professional Regulation, March 6, 2013); "Pedigree of Raiders Uncle Mo," *Greyhound Data*, <http://www.greyhound-data.com/d?i=1917536> (accessed April 15, 2014).

⁸ Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering, *Investigative Report for Case No. 2011036678* (Tallahassee, FL: Florida Department of Business and Professional Regulation, August 15, 2011).

⁹ *Ibid.*

GMC Kook Kever was euthanized after suffering a broken back, and a dog named **Fuzzys San Jose** died on the track after suffering a heart attack.¹⁰

- At Ebro Greyhound Park, twenty-eight greyhounds suffered “substantial” injuries and ten greyhounds were euthanized in a six-week period between May 21, 2011 and July 5, 2011.¹¹
- On May 7, 2011 a two-year-old brindle greyhound named **Gossip** was euthanized after she was struck by other dogs, flipped over, and broke her left shoulder during a race at Sanford Orlando Kennel Club.¹²
- On April 22, 2011 a two-year-old black greyhound named **Hang Aue** was euthanized after breaking several bones in his right front leg during a race at Palm Beach Kennel Club.¹³
- On January 17, 2011 a three-year-old brindle greyhound named **SV Weihl Cool** collapsed and died shortly after racing at Daytona Beach Kennel Club.¹⁴
- On January 5, 2011 a three-year-old red brindle greyhound named **Crystal B Disco** died after she collided with another dog during a race at Sanford Orlando Kennel Club, struck the rail with her forehead, and suffered an open skull fracture.¹⁵



The final race of Crystal B Disco, who died in 2011 after she struck the rail with her forehead. Still image from a video by Sanford Orlando Kennel Club.

A Racing Greyhound Dies Every Three Days in Florida

Although injury reporting is not required, greyhound death reporting became mandatory in Florida in May 2013, under Administrative Code Rule 61D-2.2023. Between May 31, 2013 and December 31, 2016 a total of 376 greyhound deaths were reported to the state.¹⁶ This amounts to a greyhound death every three days, on average. A majority of the deaths were caused by racing related injuries, including broken bones, electrocution, and heat exhaustion.

¹⁰ *Ibid.*

¹¹ Florida Department of Business and Professional Regulation, *Division of Pari-Mutuel Wagering, Investigative Report for Case No. 2011028746* (Tallahassee, FL: Florida Department of Business and Professional Regulation, July 22, 2011).

¹² Florida Department of Business and Professional Regulation, *Division of Pari-Mutuel Wagering, Investigative Report for Case No. 2011023955* (Tallahassee, FL: Florida Department of Business and Professional Regulation, May 13, 2011); “Pedigree of Gossip,” *Greyhound Data*, <http://www.greyhound-data.com/d?i=1714270> (accessed April 15, 2014).

¹³ Florida Department of Business and Professional Regulation, *Division of Pari-Mutuel Wagering, Investigative Report for Case No. 2011021558* (Tallahassee, FL: Florida Department of Business and Professional Regulation, May 3, 2011); “Pedigree of Hang Aue,” *Greyhound Data*, <http://www.greyhound-data.com/d?i=1697832> (accessed April 15, 2014).

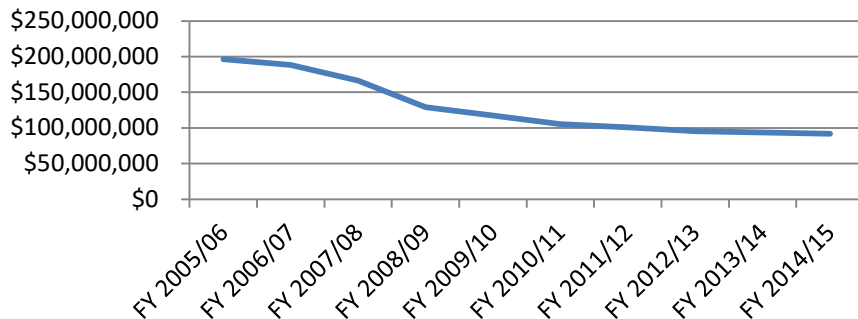
¹⁴ Florida Department of Business and Professional Regulation, *Division of Pari-Mutuel Wagering, Investigative Report for Case No. 2011004076* (Tallahassee, FL: Florida Department of Business and Professional Regulation, February 27, 2011); “Pedigree of SV Weihl Cool,” *Greyhound Data*, <http://www.greyhound-data.com/d?i=1618902> (accessed April 15, 2014).

¹⁵ Florida Department of Business and Professional Regulation, *Division of Pari-Mutuel Wagering, Investigative Report for Case No. 2011001942* (Tallahassee, FL: Florida Department of Business and Professional Regulation, February 28, 2011); “Pedigree of Crystal B Disco,” *Greyhound Data*, <http://www.greyhound-data.com/d?i=1522167> (accessed April 15, 2014).

¹⁶ Florida Department of Business and Professional Regulation, *Division of Pari-Mutuel Wagering, Greyhound Death Notifications* (Tallahassee, FL: Florida Department of Business and Professional Regulation, 2013-2014).

Greyhound Racing is a Dying Industry

**AMOUNT GAMBLED ON LIVE RACING AT FLORIDA
DOG TRACKS, FY 2006-2015**



Between fiscal years 2006 and 2015, the total amount gambled on live racing at Florida dog tracks declined by 53.2%.¹⁷ Similarly, between 2004 and 2012 tax revenue from live greyhound racing declined by 77%.¹⁸ According to a report by Spectrum Gaming Group, in 2012 Florida racetracks sustained a combined loss of \$35 million on dog racing.¹⁹

Cases of Neglect Have Been Documented at Florida Dog Tracks

Since 2008, state investigators have documented at least eight cases of severe neglect and cruelty at Florida dog tracks and associated kennel compounds. For example:

- On July 13, 2014 a greyhound named **Where's Fly In** broke his leg and shoulder during a race at Palm Beach Kennel Club. A kennel helper named Loyce Metcalfe took **Where's Fly In** directly to the track veterinarian, Dr. Neger. According to Dr. Neger, he advised Metcalfe that the dog needed to be transported to an emergency veterinary practice for additional care.²⁰ However, the dog's trainer, Michael Marsella, waited until the following morning to attempt to obtain emergency treatment for the dog. Marsella arrived at the veterinarian's on the morning of July 14 to find that the facility was not yet open. He then left **Where's Fly In** in his transport truck while he schooled the other greyhounds in his kennel. When Marsella returned to the veterinarian's thirty minutes later, he found **Where's Fly In** deceased in the truck.²¹
- On October 29, 2010 state investigators discovered 37 dead greyhounds during an inspection of the Ebro Greyhound Park kennel compound.²² Five other dogs were alive but severely emaciated, including one greyhound that was unable to stand.²³ Many of the dogs were double crated, and at least some of

¹⁷ "Permitholder Activity Reports," *Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering*, 2013, <http://www.myfloridalicense.com/dbpr/pmw/PMW-Statistics.html> (accessed April 15, 2014).

¹⁸ "Division of Pari-Mutuel Wagering, 74th Annual Report for Fiscal Year 2004-2005," *Florida Department of Business and Professional Regulation*, <http://www.myfloridalicense.com/dbpr/pmw/documents/AR/AnnualReport2004-2005--74th.pdf> (accessed April 16, 2014); Ken Lawson, Secretary for the Florida Department of Business and Professional Regulation, enclosed with letter to Representative Dana Young dated August 19, 2011.

¹⁹ "Division of Pari-Mutuel Wagering, 74th Annual Report for Fiscal Year 2004-2005," *Florida Department of Business and Professional Regulation*, <http://www.myfloridalicense.com/dbpr/pmw/documents/AR/AnnualReport2004-2005--74th.pdf> (accessed April 16, 2014); Ken Lawson, Secretary for the Florida Department of Business and Professional Regulation, enclosed with letter to Representative Dana Young dated August 19, 2011.

²⁰ Palm Beach County Sheriff's Office, *Probable Cause Affidavit* (West Palm Beach, FL: Palm Beach County Sheriff's Office, September 2, 2014).

²¹ *Ibid.*

²² Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering, *Investigative Report for Case No. 2010054357* (Tallahassee, FL: Florida Department of Business and Professional Regulation, May 13, 2011); Felicia Kitzmiller, "Greyhound abuse defendant ready for plea bargain," *Panama City News Herald*, February 10, 2011.

²³ *Ibid.*



A severely emaciated greyhound that was discovered in a kennel at Ebro Greyhound Park. Photograph by the Florida Department of Business and Professional Regulation, 2010.

the dogs had silver duct tape wrapped around their necks.²⁴ The tape was wrapped so tightly that it could not be cut off and had to be unwrapped.²⁵ A necropsy later determined that the greyhounds died from dehydration or starvation.²⁶

A greyhound trainer named Ronald Williams was subsequently arrested and charged with 42 counts of felony animal cruelty.²⁷ Williams spent a year in jail before agreeing to plead no contest to thirty-nine counts of felony cruelty to animals.²⁸ He also agreed to waive the jail credit for his time served, and was sentenced to five years in prison for each count, to be served concurrently.²⁹

- In 2009, trainer Osman Martinez was arrested for felony cruelty to animals after a greyhound was found with a large, infected neck wound at Palm Beach Kennel Club.³⁰ Martinez had failed to get the dog veterinary care and lied about the cause of the injury. He agreed to a plea deal that same year, but it took the state until 2011 to bar Martinez from all state greyhound facilities. However, Martinez did not surrender his license until 2012, after a dog in his control tested positive for drugs.³¹
- On July 2010 a veterinarian and a track official documented unsanitary conditions in a kennel at the Sanford Orlando Kennel Club.³² According to witness statements the kennel had "a strong smell of ammonia" from urine, "indicating that the kennel was not being properly cleaned."³³ The trainer responsible for the kennel was banned from the facility, but no further action was taken.³⁴



Dooley, an injured greyhound found at Palm Beach Kennel Club. Photograph from the Palm Beach Sheriff's Office, 2009.

²⁴ *Ibid.*

²⁵ *Ibid.*

²⁶ *Ibid.*

²⁷ "PDL man charged with 37 counts of animal cruelty," *Washington County News*, November 1, 2010; "Williams pleads guilty to animal cruelty charges," *WMBB TV News*, October 20, 2011, <http://www.wmbb.com/story/15740794/williams-pleads-guilty-to> (accessed April 11, 2014).

²⁸ "Williams pleads guilty to animal cruelty charges," *WMBB TV News*, October 20, 2011, <http://www.wmbb.com/story/15740794/williams-pleads-guilty-to> (accessed April 11, 2014).

²⁹ *Ibid.*

³⁰ Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering, *Waiver Investigative Report No. 2013049611* (Tallahassee, FL: Florida Department of Business and Professional Regulation, April 3, 2014).

³¹ Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering, *Consent Order Case No. 2012022902* (Tallahassee, FL: Florida Department of Business and Professional Regulation, June 20, 2012).

³² Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering, *Investigative Report for Case No. 2010035789* (Tallahassee, FL: Florida Department of Business and Professional Regulation, October 4, 2010).

³³ *Ibid.*

³⁴ *Ibid.*

Greyhounds Repeatedly Test Positive for Drugs, Including Cocaine

Over the past decade, greyhounds at Florida tracks have repeatedly tested positive for serious drugs, including cocaine. For example:

- According to state records, a greyhound tested positive for cocaine at Sanford Orlando Kennel Club in September 2015.³⁵
- In December 2013, a greyhound named **Rude Reuben** tested positive for cocaine at Mardi Gras Racetrack in Florida.³⁶ Less than a month later, another dog at the same track also tested positive for the prohibited substance.³⁷
- According to a January 2011 news report, seven greyhounds tested positive for cocaine at Daytona Beach Kennel Club.³⁸
- A greyhound named **Scotty Smalls** tested positive for a cocaine metabolite after racing at Orange Park on January 6, 2010.³⁹ As a result of this positive test, a greyhound trainer was fined \$1,000.⁴⁰
- According to the University of Florida Racing Laboratory, there were 49 positive greyhound drug tests in fiscal year 2009/2010, including nine positive tests for cocaine or a cocaine metabolite.⁴¹

In addition to these cocaine positives, the Department of Business and Professional Regulation has investigated other cases involving drugs. For example, on May 18, 2011 state investigators discovered a vial of testosterone propionate in a racing kennel at Derby Lane in St. Petersburg.⁴² Testosterone propionate is an oil-based, injectable anabolic steroid.⁴³

According to a 2010 investigative report, the state does not test racing greyhounds for steroids.⁴⁴ In the same report, Dr. Richard Sams of the University of Florida Racing Laboratory indicated that anabolic steroids, such as Stanozolol, would be “excellent” for enhancing performance.⁴⁵

State Inspection Reports Have Documented Humane Issues

GREY2K USA conducted an analysis of 2,480 greyhound kennel inspection forms that were filed by the Florida Department of Business and Professional Regulation between January 1, 2009 and April 27, 2010 and January

³⁵ Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering, *Weekly Report September 17, 2015* (Tallahassee, FL: Florida Department of Business and Professional Regulation, September 17, 2015).

³⁶ Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering, *Investigative Report No. 2014000975* (Tallahassee, FL: Florida Department of Business and Professional Regulation, January 24, 2014).

³⁷ Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering, *Investigative Report No. 2014004823* (Tallahassee, FL: Florida Department of Business and Professional Regulation, February 11, 2014).

³⁸ “Dogs at Daytona Beach Kennel Club Test Positive for Cocaine,” *WFTV TV News*, January 15, 2011, <http://www.wftv.com/news/news/dogs-at-daytona-beach-kennel-club-test-positive-fo/nFDD6/> (accessed April 11, 2014).

³⁹ Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering, *Administrative Complaint for Case No. 2010010453* (Tallahassee, FL: April 14, 2010); Kate Howard, “Cocaine in Jacksonville racing greyhounds leads to arrest,” *Florida Times Union*, July 14, 2010.

⁴⁰ *Ibid.*

⁴¹ University of Florida Racing Laboratory, Drug Positives for Fiscal Year 2009/2010.

⁴² Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering, *Investigative Report for Case No. 201102568* (Tallahassee, FL: Florida Department of Business and Professional Regulation, June 21, 2011).

⁴³ “Testosterone propionate,” *Anabolic Bible*, http://www.anabolic-bible.org/Profile.aspx?callpage=testosterone_propionate (accessed April 11, 2014).

⁴⁴ Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering, *Investigative Report for Case No. 2009043310* (Tallahassee, FL: Florida Department of Business and Professional Regulation, February 26, 2010).

⁴⁵ *Ibid.*

2013 through October 2014.⁴⁶ These reports documented several humane concerns, including poor kennel conditions, injured dogs, dozens of incidents where greyhounds were double caged, possible drug violations and fire hazards.⁴⁷

Greyhounds Have Died from a Form of Horse Flu

In the summer of 2004, hundreds of greyhounds fell ill with a respiratory illness and ten dogs died at racetracks across Florida.⁴⁸ Greyhounds died from the illness at Naples-Ft. Myers Greyhound Track, Palm Beach Kennel Club, Sanford Orlando Kennel Club and Derby Lane.⁴⁹ Six greyhounds had died from the illness the previous year.⁵⁰

It was later proven that the dogs died from a form of horse flu that had never before jumped species.⁵¹ Within a year, this new dog flu had spread beyond the greyhound racing industry to pet dogs and was detected in several states throughout the country.⁵²

In 2006, seventeen greyhounds died from a respiratory illness at Naples-Ft. Myers Greyhound Track.⁵³ According to a spokesperson for the Florida Department of Business and Professional Regulation, at least two additional greyhounds died from the same illness at other tracks in the state.⁵⁴

Dog Track Acknowledges That a Pesticide Was Used on Dogs

In November 2011, the general manager of Daytona Beach Kennel Club admitted that greyhounds at the track had been given a pesticide named Termidor for years, in an attempt to control fleas and ticks.⁵⁵ After an investigation by the state Department of Agriculture and the U.S. Occupational Safety and Health Administration, the track agreed to stop the practice.⁵⁶ In announcing its decision, Daytona's general manager stated that the use of Termidor was an "industry standard" practice and it was used by greyhound kennels because it is "cheaper" than flea and tick repellants.⁵⁷

Greyhounds Have Died While Being Transported to Florida Tracks

Because greyhounds often compete at multiple facilities during their career, they are frequently moved over long distances. On at least two recent occasions, greyhounds have died while being transported to Florida racetracks:

⁴⁶ Florida Department of Business and Professional Regulation; analysis by GREY2K USA.

⁴⁷ *Ibid.*

⁴⁸ Kristen Zambo, "Sick racetrack dogs suffering relapses," *Naples Daily News*, July 31, 2004, http://www.naplesnews.com/news/2004/jul/31/ndn_sick_racetrack_dogs_suffering_relapses/?print=1 (accessed April 11, 2014).

⁴⁹ *Ibid.*

⁵⁰ *Ibid.*

⁵¹ Rob Stein, "Dog flu jumped from horses," *Washington Post*, September 27, 2005, <http://www.washingtonpost.com/wp-dyn/content/article/2005/09/26/AR2005092601854.html> (accessed April 11, 2014). (after the publication of this news report the illness was detected in additional states).

⁵² *Ibid.*

⁵³ Anne Marie Apollo, "Illness continues to kill greyhounds at track," *Naples Daily News*, June 17, 2006, http://www.naplesnews.com/news/2006/jun/17/2_more_greyhounds_track_die_virus/ (accessed April 11, 2014).

⁵⁴ *Ibid.*

⁵⁵ Tom Knox, "Daytona Beach Kennel Club halts use of pesticide on dogs," *Daytona Beach News-Journal*, November 5, 2011, <http://dndev.ny.atl.publicus.com/article/20111105/ARTICLES/311059954?Title=Daytona-Beach-Kennel-Club-halts-use-of-pesticide-on-dogs> (accessed April 11, 2014).

⁵⁶ *Ibid.*

⁵⁷ *Ibid.*

- Three greyhounds died in August 2008 while being transported from Iowa to the Palm Beach Kennel Club.⁵⁸ The dogs apparently died of heat related illness.⁵⁹
- On September 14, 2005, ten greyhounds were killed and several others injured when a trailer caught fire on State Road 434.⁶⁰ The dogs were being taken to Jacksonville to race.⁶¹

At Florida Tracks, Greyhounds are Fed Cheap Meat to Reduce Costs

According to the industry handbook *Care of the Racing and Retired Greyhound*, greyhound trainers routinely use "4-D" meat from dying, diseased, disabled, and dead animals.⁶² This meat is used because "it is the most economically feasible for the Greyhound industry at this time."⁶³ To discourage human use, 4-D meat contains denatured charcoal.⁶⁴ As a result of eating 4-D meat dogs can be exposed to pathogenic microorganisms, including *Salmonella*, *Campylobacter jejuni*, and *Escherichia coli*.⁶⁵ In 2014, two dogs died and close to 100 fell ill at Daytona Beach Kennel Club from a suspected case of "bad meat."⁶⁶

Regulation of Florida Greyhound Racing is Insufficient

Under current Florida law, felons can be licensed in the greyhound racing industry if they are given a special waiver from the state Division of Pari-Mutuel Wagering.⁶⁷ As a result of this law, violent felons are sometimes directly responsible for the health and welfare of racing greyhounds. For example, an individual named Saul Mays, who had a criminal history involving assault and kidnapping, was given a waiver by the state.

From January 2013 through July 2014, 79 applications for waivers were granted by the Division and 114 were denied.

In addition, Florida regulators are slow to act on disciplinary matters. In many cases it has taken years to punish licensees who violate rules, including animal welfare regulations, and sometimes the penalties handed down are also insufficient.

Last Updated on March 6, 2017

⁵⁸ Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering, *Investigative Report for Case No. 2008044972* (Tallahassee, FL: Florida Department of Business and Professional Regulation, January 8, 2009).

⁵⁹ *Ibid.*

⁶⁰ Gary Taylor, "10 racing greyhounds die in trailer fire," *Orlando Sentinel*, September 14, 2005, http://articles.orlandosentinel.com/2005-09-15/news/DOGS15_1_dogs-seminole-county-trailer (accessed April 11, 2014).

⁶¹ *Ibid.*

⁶² Linda L. Blythe et al., *Care of the Racing and Retired Greyhound* (Topeka: American Greyhound Council Inc., 2007), 151.

⁶³ *Ibid.*

⁶⁴ *Ibid.*

⁶⁵ Paul S. Morley et al., "Evaluation of the association between feeding raw meat and Salmonella enterica infections at a greyhound breeding facility," *Journal of the American Veterinary Medical Association* 228, no. 10 (2006): 1524-1532; Linda L. Blythe et al., *Care of the Racing and Retired Greyhound*.

⁶⁶ Jeffrey Cassidy, "2 dogs die, 97 sickened at Daytona Beach greyhound track," *The Daytona Beach News-Journal*, August 6, 2014, <http://www.news-journalonline.com/article/20140806/NEWS/140809638> (accessed September 26, 2014).

⁶⁷ Rule 61D-5.001.