



**Federally Protected Horses to Slaughter: An Epidemic within BLM
Adoption Incentive Program**
American Wild Horse Campaign Report
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Table of Contents

Table of Contents	1
I. OVERVIEW	2
II. BACKGROUND	4
III. METHODOLOGY	7
V. THE KILL PENS	19
VI. BLM REFORMS TO THE AIP ARE INADEQUATE TO ADDRESS THE PROBLEM	19
Appendices:	24

APPENDIX 1: BLM Wild Horses and Burros in Kill Pens: Confirmed as AIP	
APPENDIX 2: BLM Wild Horses and Burros in Kill Pens: Pending Confirmation	
APPENDIX 3: Wild Horses and Burros Advertised as BLM Animals: Unidentified Due to Obscuring of Brands	
APPENDIX 4: Signed Example of Adoption Incentive Agreement	
APPENDIX 5: Repeat Offenders	
APPENDIX 6: Families of Concern	
APPENDIX 7: The Kill Pens	
APPENDIX 8: AWHC's Reforms Analysis	
APPENDIX 9: BLM Communications	
APPENDIX 10.: BLM Alternative Incentive or Assistance Programs	
APPENDIX 11: Not AIP animals in kill pens	

I. OVERVIEW

The Bureau of Land Management’s (BLM) Adoption Incentive Program (AIP) pays individuals \$1,000 per animal to adopt up to four unhandled, untrained wild horses or burros each year. While the agency touts the program as a success for increasing adoption rates to levels not seen in decades, mounting evidence shows that the incentive program – which has cost taxpayers over \$12 million to date – has become a pipeline to slaughter for far too many of these federally-protected animals.

In fact, the American Wild Horse Campaign’s (AWHC) investigation reveals that the AIP is routinely being defrauded by adopters who, after receiving title to their animals, are pocketing the cash incentives, then promptly sending their wild horses and burros to livestock auctions, known as kill pens.¹ These findings were affirmed in a May 2021 *New York Times* investigative report, concluding, “...records show that instead of going to good homes, truckloads of horses were dumped at slaughter auctions as soon as their adopters got the federal money. A program intended to protect wild horses was instead subsidizing their path to destruction.”

AWHC began investigating the program in November 2020 using records obtained through the Freedom of Information Act (FOIA) and paperwork obtained from auctions via rescue groups or directly from the auctions’ public postings. In summary, our findings include:

A. 840 BLM-branded wild horses and burros identified in kill pens in 19 months.

As of the date of this report:

- 428 of these equines have been identified by BLM brand or microchip number, with 72.8% (312) of them confirmed *so far* as adopted through the AIP.
- Just 38 of the 428 identified equines (7%) have been confirmed as *not* adopted through the AIP. (see appendix 11)
- Confirmation of the AIP status of the 78 remaining identified animals is pending AWHC’s receipt of FOIA records.
- 412 wild horses and burros have been identified by the kill pen as BLM animals, however, AWHC has not been able to obtain their brand numbers due to the kill pens’ visual obstruction of BLM brands in public postings. The whereabouts of these animals remain unknown.

72.8% of the BLM wild horses and burros identified in kill pens for which AWHC obtained brand numbers have so far been confirmed as AIP. The remainder are awaiting confirmation pending receipt of FOIA records.

¹ “Kill pens” are livestock auctions that either sell equines directly to slaughter plants in Canada and Mexico, or sell them to middlemen, known as kill buyers, who ship the animals across the border and sell them to plants that slaughter equines for human consumption for foreign markets.

- The vast majority of these animals were unhandled, untrained equines, a marked departure from the pre-AIP landscape in which far fewer BLM mustangs arrived in kill pens and those that did were generally halter broken and/or saddle trained.

B. AWHC has identified 24 groups of related individuals have adopted multiple wild horses and burros to the same address, then flipped all the animals to kill pens as a group after receiving the full incentive payments.²

- At least 130 BLM wild horses or burros were sent to kill pens as part of such coordinated schemes.
- Groups netted up to \$30,000 from incentive payments and auction fees from the first round of AIP adoptions.

C. Numerous adopters have been identified on their second, or even third, round of AIP adoptions despite disposing of their previously adopted animals in kill pens.

- BLM allows adopters to adopt more horses or burros under the AIP after receiving titles to previously adopted animals. The only restriction appears to be that each adopter is limited to four animals in a 12-month period.
- The agency apparently does not verify the whereabouts of previously adopted animals before placing more animals in adopters' care.
- One group of related individuals earned \$82,000 in incentive payments alone through multiple rounds of AIP adoptions.

D. AIP slaughter hotspots have been identified in Kansas, Oklahoma, and Texas, all within the jurisdiction of the BLM New Mexico State Office³

- The New Mexico BLM was the center of [a slaughter scandal](#) two decades ago.
- The majority of equines identified in this report were adopted through the BLM New Mexico office.

E. The influx of wild horses and burros into slaughter auctions as a result of the AIP has exceeded the capacity of rescue organizations to take in the animals.

- The overwhelming number of unhandled, untamed wild horses and burros in need of rescue limits the options for placing these animals and has placed an extreme burden on rescue organizations.
- The lack of rescue capacity is placing increasing numbers at risk of shipping to slaughter in Canada and Mexico.

² Before the proposed changes to the program announced on January 26, 2022, the incentive was paid to adopters in two installments, one within 60-90 days of adoption date and the second within 60-90 days of the title date.

³ Source: <https://www.blm.gov/office/new-mexico-state-office> (Last visited January 27, 2022).

It's important to note that the statistics contained in this report represent the tip of the iceberg, as many kill pens directly ship horses and burros to slaughter without advertising them. **The true number of wild horses and burros entering the slaughter pipeline as a direct result of the AIP is likely much larger than what AWHC's investigation has uncovered to date.**

Wild horses and burros are protected under federal law as "living symbols of the historic and pioneer spirit of the West." 16 U.S.C. § 1331 The BLM is prohibited by a long-standing Congressional ban (enacted in appropriations bills such as Public Law No: 116-260) from selling wild horses and burros in a manner that results in their commercial slaughter. Our investigation shows that the AIP has become a laundering mechanism for the BLM to move horses and burros out of holding facilities and into the slaughter pipeline, bypassing the Congressional ban.

After being presented with AWHC's initial findings in a [May 2021 report](#), a subsequent [rulemaking petition](#) filed by AWHC in June, and a July 2021 [National Wild Horse and Burro Advisory Board recommendation](#) to end cash incentives, the BLM commissioned a stakeholder engagement process with a select and limited number of organizations to discuss alternatives and potential changes to the AIP. AWHC maintains that this stakeholder process does not alleviate the BLM's responsibility under the National Environmental Policy Act to conduct an environmental analysis of the AIP, including public comment opportunities. Further, while this process allowed for dialogue related to the issues created by the AIP, the BLM has failed to date to conduct a transparent investigation of the program or take meaningful or timely concrete action to address the problem. As will be addressed later to this report, the [modifications to the program](#) implemented by the BLM earlier this year are not sufficient to address the fundamental flaws of a cash incentive system and the risk it poses to the wild horses and burros the agency is charged with protecting.

II. BACKGROUND

A. The Adoption Incentive Program

On January 30, 2019, the BLM published Instruction Memorandum [IM 2019-025](#), *Adoption Incentive Program for Wild Horses and Burros*. The policy summary stated that the AIP was developed in order to increase the number of adoptions of untrained wild horses and burros by offering financial incentives: two payments of \$500. The first incentive payment is made within 60 days from the adoption date and the second \$500 payment is made within 60 days from the title date. It was presumed, but not required, that adopters would use AIP money for training and initial care of these ungentled wild horses and burros.

Under the Wild Free-Roaming Horses and Burros Act 16 U.S.C. § 1333(c), the BLM transfers titles to qualified adopters one year from the adoption date. Under [BLM policy](#), individuals may adopt up to four untitled animals at one time. Once title has transferred, they can adopt up to four additional horses and/or burros.

According to [BLM IM 2019-025](#), compliance inspections prior to title transfer “should be completed on animals adopted through the AIP. These animals will be identified on a newly developed Wild Horse and Burro Program System (WHBPS) report titled ‘*Required Inspections for Incentive Animals*.’”

Adopters are also required to sign the BLM’s adoption application certifying under penalty of prosecution for violating 18 U.S.C. § 1001 (which makes it a federal crime to make false statements to any federal agency) that “*I will provide humane care for any animals that I adopt and will not knowingly sell or transfer ownership of them to any person or organization that intends to resell, trade, or give away such animals for slaughter or processing into commercial products.*”⁴

All adopters must also sign the BLM’s Private Maintenance and Care Agreement (PMACA), which states under the same threat of prosecution, “*I hereby state that I have no intent to sell this wild horse or burro for slaughter or bucking stock, or for processing into commercial products, within the meaning of Wild and Free-Roaming Horse and Burro Act, 16 U.S.C. 1331 et seq., and regulations, 43 CFR 4700.0-5(c).*”

B. AWHC’s Investigation

“[R]ecords show that instead of going to good homes, truckloads of horses were dumped at slaughter auctions as soon as their adopters got the federal money. A program intended to protect wild horses was instead subsidizing their path to destruction.”

- *New York Times*,
May 15, 2021

In November 2020, AWHC began receiving reports from rescue groups about an influx of BLM-branded wild horses and burros to known kill pens. The timing of the influx (beginning in March 2020) coincided with the one-year mark for the AIP and the corresponding payment of the first round of final cash incentive installments.⁵ Prior to the AIP, wild horses and burros were being sold at kill pens, but in far fewer numbers. Additionally, most of the horses and burros in kill pens pre-AIP were trained animals, while post-AIP the vast majority are unhandled, untrained equines, some still with BLM holding facility tags around their necks over a year after adoption.

AWHC began to investigate the situation in November of 2020 and compiled its initial findings in a [May 2021 report](#). Based on AWHC’s findings, the *New York Times* ran a front-page exposé on May 15, 2021, entitled “[Wild horses adopted under a federal program are going to slaughter.](#)”

⁴ Previously adopters were required to certify that they “will not sell or transfer ownership” of their adopted animals “to any person or organization that intends to resell, trade, or give away such animals for slaughter or processing into commercial products,” however the language was weakened in January 2022 to add the word “knowingly,” increasing the burden of proof and making prosecutions for violation more difficult.

⁵ As noted above, before the January 26, 2022 changes to the AIP, the second AIP cash incentive of \$500 was transferred to adopters within 60-90 days of title transfer.

AWHC submitted its report to the Department of the Interior and the Bureau of Land Management on May 19, 2021. Following the release of the May report, 31 members of the [U.S. House of Representatives](#) and [U.S. Senator Dianne Feinstein](#) wrote to the Department of the Interior calling on the BLM to suspend the AIP pending a full and transparent investigation of the link between the program and slaughter.

Then, on June 3, 2021, AWHC submitted a formal rulemaking petition pursuant to 5 U.S.C. § 553(e), that requested the BLM either withdraw the AIP in its entirety or, if the agency insisted on retaining the AIP in some form, impose a moratorium on any further payments under the AIP while the agency engaged in formal notice-and-comment rulemaking to design a program that complies with federal law. After the BLM failed to respond, AWHC [filed suit](#) on July 2, 2021. That suit is pending in the Federal District Court of Colorado.

C. The BLM's Reforms to the AIP

In response to media exposure and mounting public pressure, the BLM released a [set of minor reforms](#) to the program on July 26, 2021. These reforms were codified and expanded on in an [Instruction Memorandum \(IM 2022-014\)](#) for the program issued on January 26, 2022. These nominal reforms have missed the mark in ensuring BLM wild horses and burros remained out of the slaughter pipeline. Some, arguably, have made the situation worse.

As this report will demonstrate, the AIP reforms implemented by the BLM have not stemmed the flow of BLM wild horses and burros into kill pens. While AWHC and its rescue partners, Evanescent Mustang Rescue and Sanctuary (EMRS) and Skydog Sanctuary, have continued to document the link between BLM wild horses and burros in kill pens and the AIP, the BLM [has continued to tout the program](#) as a success in placing record numbers of wild horses and burros into private care. In doing so, the agency is turning a blind eye to the hundreds of these animals being dumped in kill pens and placed in imminent threat of slaughter.

A more detailed breakdown of the shortcoming of these reforms and recommendations for changes to the program is included in Section VI of this report.

During the stakeholder process mentioned above, the BLM has committed to exploring six areas of reform to the AIP. These include considering non cash incentives, exploring the ability to exercise discretion in offering the AIP to certain individuals, considering requiring AIP animals to be gentled at the one-year mark, encouraging and supporting interested parties in establishing a community of successful adopters to share tips, safe handling techniques, and training methods, etc, supporting states in managing local networks to develop public/private partnerships for compliance checks, reception of returned animals, and reporting, and finally exploring limiting the number of incentives available to each adopter. The timeframe for consideration and potential implementation of program reforms remains unknown. Meanwhile, wild horses and burros continue to be sent to slaughter auctions via the AIP.

III. METHODOLOGY

AWHC monitors the Facebook postings of approximately 23 self-identified kill pens (**Appendix 7**) to identify and track BLM wild horses and burros being sold. Once a horse or burro is posted on the kill pen's page, AWHC investigators take a screenshot of the animal and any pertinent information posted by the pen, including BLM brand numbers and sometimes ownership titles, and enter the information into AWHC's online identification database. If the horse or burro is rescued by one of AWHC's rescue partners, the rescue sends the title and any other information to AWHC investigators who update the entry in the database.

Simultaneously, AWHC files FOIA requests to BLM National and State Offices to obtain AIP records for each BLM wild horse or burro identified by brand or title at a kill pen, as well as records of all BLM wild horses or burros adopted through the AIP since its implementation. These requested records include:

- payment records
- agency communications with the adopters
- copies of the adoption agreements
- Adoption Incentive Program agreements, and
- compliance inspection forms.

The records provide information such as brand numbers, adoption dates, inspection dates, and any notes from the authorized personnel who inspected the animal. AWHC's FOIA requests are ongoing and submitted on a rolling basis with the goal of attaining full documentation on all AIP horses and burros adopted since the program began.⁶ Records obtained under FOIA are uploaded to the identification database.

AWHC obtains brand numbers in several ways: through FOIA, from organizations that have rescued the animals, and from kill pen photographs posted on Facebook. Once brand numbers have been obtained, AWHC investigators are able to cross-reference the brand against the compliance inspection records in AWHC's database to determine the animal's AIP status. If the horse or burro cannot be identified as AIP by the records AWHC maintains, then AWHC files a FOIA request for the records of that specific brand. All this information is stored in AWHC's identification database.

AWHC conducts additional background investigations on adopters through available public records and internet resources. Through this process, AWHC has so far confirmed 23 familial relationships between adopters adopting large groups of animals.

⁶ Although submitting numerous FOIA requests and reviewing the resulting records is resource-intensive, and although BLM generally delays releasing information until long after the deadlines mandated by law, the FOIA process remains the public's only means of obtaining information because BLM does not otherwise make this type of information publicly available.

IV. FINDINGS

A. Total Number of Horses and Burros Identified in AWHC's Investigation

Since the start of its investigation, AWHC has identified 840 BLM-branded wild horses and burros in kill pens between September 2020 and the date of this report. AWHC was able to obtain titles or brand numbers for 428 of these animals and has so far confirmed 312 as adopted through the AIP. (**Appendix 1**). The AIP status of the remaining 78 animals is awaiting AWHC's receipt of requested FOIA records. (**Appendix 2**).

It is important to note that as it receives records under FOIA requests, AWHC is consistently confirming that the vast majority of animals for which AWHC has obtained brand numbers have been adopted through the AIP. For example, [AWHC's May 2021 Report](#) identified 80 titled wild horses and burros discovered in kill pens across the country. At the time of the report, AWHC had confirmed 22 of the 80 wild horses and burros as adopted through the AIP. Since the release of the report, AWHC has received FOIA records that **confirm that 78 of the 80 originally identified animals were adopted through the AIP**, and expects to confirm the two remaining equines as AIP once it receives the corresponding FOIA records.

The remaining 412 horses or burros are unidentified due to the visual obstruction of BLM brands in photos posted by the kill pens, such as those below. (**Appendix 3**).

As noted above, the data obtained by AWHC is just the tip of the iceberg as many horses and especially burros are not posted for sale by kill pens before they are shipped to slaughter. The true number of BLM animals sent to slaughter in Canada and Mexico is unknown.⁷

B. Families Adopting Large Groups of Horses or Burros then Sending Them to Kill Pens

To date, AWHC has identified 24 separate groups of related individuals who adopted multiple wild horses and or burros through the AIP to the same address, and around the same time.

These groups of individuals then sold their horses to various kill pens in a group. These families are highlighted in the charts in **Appendix 1**. All signed Adoption Incentive Agreements agreeing under penalty of prosecution to provide humane care for any adopted animal and that the adopter will not “sell or

“It's economics... [I] can make about \$800 putting a calf on my land for a year. With the horses, I made \$1,000, then turned around and sold them for \$500.”
- AIP Adopter Lonnie Krause, *New York Times*, May 15, 2021

⁷ This number is unknown in part because no federal agency monitors how many wild horses or burros are exported for slaughter or makes this information available to the public.

*transfer ownership of them to any person or organization that intends to resell, trade or give away such animals for slaughter or processing into commercial products.” (See **Appendix 4** for an example of these signed agreements.)*

- The [Kidd family](#) (sp. Gary, James, Tammy, Brenda, and Dustin) of Arkansas received the titles for 20 wild horses from the BLM on September 14, 2020, and October 5, 2020. The horses were sold at the Cleburne Horse Sale in Cleburne, Texas on November 11, 2020.
- The Cumin family (sp. Lacey, Nathan, Cole and Jessica) of Big Timber, Montana received titles to 13 wild horses on three dates: June 30, 2020, July 7, 2020, and July 15, 2020. All horses were sent to the Peabody Horse Auction on October 1, 2020.
- The Patterson family (sp. Terry, Jean and Lee) of Marlow, Oklahoma adopted 12 BLM burros on March 10, 2020. They received titles for them in two batches, on March 22, 2021 and March 30, 2021. The burros were sold at the Stroud, Oklahoma Kill Pen in May 2021. AWHC and EMRS partnered on the rescue of these 12 burros. When EMRS checked the brands of the burros against the titles provided, two did not match up. EMRS alerted the BLM to the untitled animals illegally sold. The BLM then informed EMRS that the Patterson family actually adopted a total of 20-24 burros through the AIP. The first group of 12 had been titled and were brought to the kill pen, but the adopters mixed up the burros when loading them and brought some burros who had not yet been titled to the auction. The BLM told EMRS that the adopters were banned from the program and were not going to receive the second incentive for the remaining 12 burros. However, **the BLM allowed the animals to remain in the possession of the adopters despite the threat of slaughter. The agency also did not require the family to pay back the cash incentives.**
- The Watkins, Thomas, Long group of related individuals (sp. Matthew, Tera, Rachel) of Lindsay, Oklahoma adopted 10 BLM burros on March 10, 2020. This family received the title in two batches, the first on April 14, 2021, and the second on May 3, 2021. The burros were all sold at the Stroud Oklahoma Kill Pen on July 20th, 2021. All burros were titled to the same address, confirming these individuals were related.
- The Butler/Campbell group of related individuals (sp. Richard, Jodi, Jarrod) of Idabel, Oklahoma adopted a total of nine BLM wild horses and sent them to two kill pens on two dates.
 - On August 16, 2019, Richard Butler adopted at least three horses through the AIP. He received title to those horses on August 8, 2020.

- On August 28, 2020, Mr. Butler adopted two more horses through the AIP. On this same date, his relative Jodi Butler adopted one horse through the AIP and his associate Jarred Campbell⁸ adopted a minimum of three horses through the AIP. The Butlers received title to their horses on September 20, 2021, while Mr. Campbell received title to his horses on October 5, 2021.
 - On November 12, 2021, one of the AIP horses Mr. Butler adopted in 2019 and Ms. Butler's 2020 AIP horse were sold at the Stroud Oklahoma Kill Pen.
 - Days later, on November 18, 2021, Mr. Butler's other two 2019 AIP horses and his two 2020 AIP horses were sold at the Elkhart Horse Auction along with the three horses Mr. Campbell adopted in 2020. One of the horses was sold with a seven-month foal. All seven BLM horses and the foal were rescued by EMRS and AWHC.
- The Peabody family (sp. Cynthia and Allen) of Joliet, Montana adopted a minimum of seven wild horses from the BLM on June 16th, 2020. They received titles for these animals on July 23, 2021. All seven were sold at the Billings Loose Horse Sale on July 23, 2021. All seven horses were rescued by AWHC and EMRS. There was an eighth BLM mustang at this auction, but he/she was purchased by a well-known Canadian kill buyer before EMRS could rescue the animal. Because EMRS and AWHC were not able to ascertain the brand number of this mustang, it is unclear if that horse was also part of the Peabody family group.
 - The Anderson (Sp. Dymiti and Joe) Group of related individuals adopted a minimum of five BLM horses. Three of the five were titled on March 3, 2021. These horses were documented in the North Texas Feedlot and Auction on April 11, 2021. The other two horses were adopted and titled on unknown dates. These two were documented and identified by BLM brand in the Peabody Horse Auction on October 8, 2021.
 - The Craig family (sp. Glenda and James) of Spiro, Oklahoma adopted at least two wild horses from the BLM on two dates. One was on August 13, 2019, and the second is unknown. They received titles in two batches on December 17, 2020, and on August 10, 2020. The horses were sold at the Peabody Horse Auction on October 10, 2021.

⁸ AWHC's investigation confirmed that Richard Butler and Jarred Campbell at minimum know each other through Facebook and seemingly work or worked at the McCurtain County Rodeo together.

- The Vinson (sp. Victoria and Tommy) family of Marietta, Oklahoma adopted at least two BLM horses, through the AIP, on two dates. The first was adopted on December 1, 2019, and the title was received on January 1, 2021. The second was adopted on February 11, 2020, and the title was received on February 23, 2021. These horses were sold at the Peabody Horse Auction in October 2021. Tommy Vinson is documented adopting additional animals after he flipped his first group to the kill pen. (**Appendix 5a**).
- The Booth family (sp. Jaunita and Donald) of Millerton, Oklahoma adopted two BLM animals on June 9, 2020, and August 28, 2020. They received the title on August 20, 2021, and on an unknown date in 2021. The animals were then sold at the Stroud Oklahoma Kill pen in September 2021.
- Lonnie Krause of Bison, South Dakota adopted four animals, the maximum number possible through the AIP, on an unknown date. He received the title for these animals on September 14, 2020. All four were identified in the Fabrizio Livestock Auction in October 2020. Conner Palmer, Mr. Krause's [apparent grandson](#), adopted a minimum of two BLM animals through the AIP on an unknown date. Mr. Palmer received the title for these animals on September 14, 2020. All four were identified in the Fabrizio Livestock Auction, located in Colorado, in October 2020.

Mr. Krause was interviewed for the [NYT Exposé](#) where he stated that *"It's economics,"* and that he *"can make about \$800 putting a calf on my land for a year. With the horses, I made \$1,000, then turned around and sold them for \$500."* Mr. Krause continued to say that agency employees told him he wasn't breaking any rules by reselling the horses at auction and that there was no limitation on the horses.

- The Lessert family (sp. Sherry and Chad) of Blackwell, Oklahoma adopted a minimum of five BLM burros, through the AIP, on two dates. Chad Lessert adopted three BLM burros on June 11, 2019. Nearly a month later, on July 19, 2019, Sherry Lessert adopted two BLM burros. Chad Lessert received title to the burros on June 17, 2020. All five burros were identified in the Peabody Horse Auction.
- The Castagno family (sp. Tracy, Niki, and Steve) of Moran, Wyoming adopted a minimum of three BLM animals on May 31, 2019. They received two of the titles on June 15, 2020 and the third on an unknown date. All horses were later rescued from the Stroud Oklahoma Kill Pen.
- The Stanfield family (sp. Wendell and Geraldine) of Konawa, Oklahoma adopted a minimum of three BLM animals. Geraldine Stanfield adopted one BLM animal

on June 11, 2019. She received the title for this horse on June 17, 2020. The animal was later identified in the Stroud OK Kill Pen in October 2021. Wendell Stanfield adopted a minimum of two BLM animals on an unknown date. Mr. Stanfield received title to these animals on May 18, 2020. The horses were identified in the Stroud Oklahoma Kill Pen in October 2021. Through additional FOIA documents, Mr. Stanfield has been identified as a “repeat offender” as described in section C.

- The Tyler family (sp. Ben, Billy, Virgil, Shawna, Jeffrey, and Jacci) adopted a minimum of eight BLM animals and sent them to kill pens. Additional FOIA documents identify all individuals as “repeat offenders” as described in section C. Through FOIA documents, six additional members of the Tyler family, as described in section D, were identified to adopt the maximum number of BLM animals through the AIP.
 - Ben Tyler adopted a minimum of one BLM animal on August 16, 2019, and received the title on 8/26/2020. This horse was identified at the Peabody Horse Auction in April 2021.
 - Billy Tyler adopted a minimum of two BLM animals on June 7, 2019, and received title for them on July 7, 2020. The horses were identified in the Stroud OK Kill Pen in 2020.
 - Virgil Tyler adopted a minimum of two BLM animals in two batches. The first was adopted on June 7, 2019 (titled July 2020), and the second was adopted on June 26, 2020 (titled June 27, 2021). Both animals were identified in the Stroud Ok Kill Pen.
 - Jeffrey Tyler adopted a minimum of one BLM animal on September 8, 2020, and title on October 6, 2021. The animal was identified in the Stroud OK kill pen or Peabody Horse Auction.
 - Shawna Tyler adopted a minimum of one BLM animal on July 14, 2020, and received title on July 22nd, 2021. The animal was identified in the Stroud OK kill pen or Peabody Horse Auction.
 - Jacci Tyler adopted a minimum of one BLM animal on September 8, 2020, and title on an unknown date. The animal was identified in the Stroud OK kill pen or Peabody Horse Auction in December 2021.
- The Renaker/Stubbs group of related individuals (sp Bonnie, Terrell, and William) adopted a minimum of seven BLM animals and sold them to various kill pens.
 - Bonnie Renaker adopted three BLM animals on April 23, 2021. All three were titled on an unknown date. One horse was sold at the Elkhart Horse Sale on May 30, 2022, and the other two were sold at the Last Chance Direct Ship Horses kill pen on June 4, 2022.
 - Terrell Renaker adopted two BLM animals on April 23, 2021. Both were titled on an unknown date. One horse was sold on May 21, 2022, at the

Stroud OK Kill Pen. One horse was sold on June 4, 2022, at the Last Chance Direct Ship Horses kill pen on June 4, 2022.

- William Stubbs adopted a minimum of two BLM horses on April 23, 2021. One horse was sold at the Elkhart Horse Sale on May 30, 2022, and the other was sold at the Last Chance Direct Ship Horses kill pen on June 4, 2022.
- The Tiede family (sp. Sandy and Tim) adopted a minimum of five BLM animals. Ms. Tiede adopted three animals in two batches. The first two were adopted on July 27, 2019, and title was awarded on July 28, 2020. One of these animals was identified in the Peabody Horse Auction in April 2021 and one was identified in the Fabrizio Livestock Auction in October 2020. The third horse Ms. Tiede adopted was adopted on August 4, 2020, and received the title on August 11, 2021. This horse was identified in the Peabody Horse Auction on October 18, 2021. Mr. Tiede adopted a minimum of two BLM animals, the first on July 27, 2019 (titled on July 28, 2020). This horse was identified in the Fabrizio Livestock Auction in October 2020. The second horse was adopted on August 4, 2020, and received the title on August 11, 2021. This horse was identified in the Peabody Horse Auction in October 2021.
- The Lohman family (sp. Gary and Julie) adopted a minimum of five BLM animals. Mr. Lohman adopted two BLM animals on September 8, 2020, and received title to them on September 20, 2021. Both animals were identified in the Stroud OK Kill Pen on November 12, 2021. Ms. Lohman adopted a minimum of three BLM animals on April 13, 2021, and received title to them on April 18, 2022. The animals were identified in the Stroud OK Kill Pen in 2022.
- The Rezac family (sp. Pandy and Richard) adopted a minimum of four BLM animals on August 5, 2019. They received title to the animals on April 14, 2021. All four animals were identified in the Stroud OK Kill Pen in January 2022.
- The Carnes family (sp. Paul and Colton) adopted a minimum of three BLM animals through the AIP. Paul Carnes adopted two animals on July 9, 2019, and received title to them in July of 2020 (per FOIA documents related to the communications between BLM and Stroud OK Kill Pen). The animals were identified in the Stroud OK Kill Pen on an unknown date. Colton Carnes adopted a minimum of one BLM animal on June 6, 2020, and received title to the animal on an unknown date. The horse was identified in the Stroud OK Kill Pen on April 30, 2022.
- Crisp/Fleming group of related individuals (sp. Freddie, Norman, and Joni) adopted a minimum of six BLM animals through the AIP. Five of which were adopted on October 13, 2020, and titled on January 20, 2022. All five were found

in the Stroud OK Kill Pen on an unknown date. Joni Fleming adopted a BLM animal on August 13, 2019, and title was awarded on October 9, 2020. This horse was identified in the Stroud OK Kill Pen on January 14, 2021.

- The Megee family (sp. Callie, Lacy, Jerod, and Justin) adopted a minimum of 10 BLM burros on May 14, 2019. Lacy, Jerod, and Callie received title to the adopted burros on May 19, 2020. Callie received title to an additional burro on June 3, 2020. Justin received title to his burros on June 3, 2020. All 10 burros were rescued from the Cleburne Horse Sale in July 2021.

C. Repeat Offenders

AWHC has identified multiple individuals or groups of individuals who, within months of selling one or more BLM AIP animals at a kill pen, adopted 2-4 more animals through the incentive program. (**Appendix 5**). These records represent adoptions from one BLM facility – Pauls Valley in Oklahoma as well as compliance inspection records from the New Mexico state office. AWHC’s FOIA requests for adoption records from other BLM holding facilities are pending. With 18 BLM off-range corral facilities adopting out wild horses and burros, the number of these “repeat offenders” is likely much higher.

- Matthew and Tera Watkins (née Thomas) of Lindsay, Oklahoma adopted eight burros through the AIP on March 10, 2020, and received title to the burros on April 14, 2021. The burros were identified in the Stroud Kill Pen in Oklahoma on July 20, 2021. Then, the Watkins adopted eight new BLM burros through the AIP on August 2, 2021.
- Billy Newby of Lindsay, Oklahoma adopted a minimum of two BLM burros through the AIP on October 18, 2019. He received title to them on November 2, 2020, and sent them to the Stroud Kill Pen in Oklahoma two months later, in January 2021. Meanwhile, he adopted four new BLM animals through the AIP on December 8, 2020. On the same date, a related individual of Mr. Newby adopted an additional 4 animals from Pauls Valley.
- Wendell Stanfield of Konawa, Oklahoma adopted two BLM animals through the AIP. The date of this adoption is unknown, but two animals were titled to Mr. Stanfield on May 18, 2020. On July 13, 2021, he adopted four additional BLM animals through the AIP. In October 2021, Mr. Stanfield sent the two animals titled on May 18, 2020, plus two additional animals whose titles could not be obtained to the Stroud Kill Pen in Oklahoma.
- Tommy Vinson of Marietta, Oklahoma adopted a minimum of one BLM animal through the AIP on December 10, 2019, and received the title on January 1, 2021.

The animal was identified in the Peabody Auction House on July 20, 2021. Meanwhile, Mr. Vinson adopted two new BLM AIP animals on May 22, 2021.

- Jarred Campbell of Idabel, Oklahoma adopted four BLM animals through the AIP on August 16, 2019. The title date for these animals is unknown, but Mr. Campbell completed a title eligibility compliance inspection on July 27, 2020. He adopted his second group of a minimum of three BLM horses through the AIP on August 28, 2020. He received the title for all three on October 5, 2021. These horses were then sent to the Elkhart Auction on November 18, 2021, along with Richard Butler's BLM horses.
- Cristal Wartchow of Fitzhugh OK adopted a minimum of one BLM burro on March 10, 2020. She received title to the burro on April 15, 2021. On May 11, 2021, Ms. Wartchow then adopted four more BLM animals on May 11, 2021.
- Virgil Tyer of Tahlequah OK adopted four BLM animals on June 17, 2019. He received title for all four on June 8, 2020. One of these horses was later found in the Stroud OK Kill Pen. On June 26, 2020, Mr. Tyer adopted four more BLM animals through the AIP. He received title to these animals on June 27, 2021. One animal was identified in either the Stroud OK Kill Pen or the Peabody Horse Auction. Mr. Tyer then adopted four more animals on June 28, 2021. The total number of animals adopted by Mr. Tyer is 12 animals and he received approximately \$12,000 in federal incentive money. Additionally, Mr. Tyer is part of a group of 12 related individuals who all adopted multiple BLM animals through the AIP.
- Billy Tyer adopted four BLM animals through the AIP on June 7, 2019. He received title to them on July 7, 2020. Two of these animals were documented in the Stroud OK Kill Pen. On July 14, 2020, Mr. Tyer adopted an additional four BLM animals. The total number of animals adopted by Mr. Tyer is 8 animals and he received approximately \$8,000 in federal incentive money. Additionally, Mr. Tyer is part of a group of 12 related individuals who all adopted multiple BLM animals through the AIP.
- Joni Fleming adopted four BLM animals through the AIP on August 13, 2019. She was awarded titled on 10/9/20. One animal was documented in the Stroud OK Kill Pen. Ms. Fleming adopted an additional four BLM animals on October 13, 2020. One of these animals was also documented in the Stroud OK Kill Pen
- Sandy K Tiede adopted four BLM animals on July 27, 2019, and received title to all four on July 28, 2020. One horse was documented in the Peabody Horse Auction on April 14, 2021. On August 4, 2020, Ms. Tiede adopted four additional

BLM animals through the AIP. One horse was documented at the Peabody Horse Auction on October 8, 2021.

- Tim A Tiede adopted four BLM animals on July 27, 2019 and received title to all four on July 28, 2020. One horse was found in the Fabrizio Kill Pen in October 2021. On August 4, 2020, Mr. Tiede adopted four additional BLM animals through the AIP. One horse was documented in the Peabody Horse Auction.

D. Further Concerns

In addition to its documentation of wild horses and burros in slaughter auctions, AWHC has uncovered instances of families adopting large numbers of wild horses or burros through the AIP that merit investigation into the current whereabouts of these animals. (**Appendix 6**)

Specifically:

- A set of documents from the BLM Wyoming State Office, obtained by AWHC under FOIA, shows a group of four related individuals adopting the maximum number of BLM animals each, totaling 16 animals. FOIA documents show that they received the title for these animals on March 16, 2021, with the final incentive payment on April 28, 2021. Then, between May 28, 2021, and June 2, 2021, the original four individuals, plus two new family members, adopted four more BLM animals through the AIP each. The incentive payments brought in by this family total approximately \$40,000. AWHC has serious concerns about the whereabouts of the original 16 animals and the safety of the 24 additional equines once the title is passed and full incentive payment is received. This situation is one of many that illustrate the serious concern that there is no mechanism for ensuring the location/well-being of animals previously adopted before more are adopted and sold.
- A set of documents obtained by AWHC under FOIA showed a group of 12 related individuals, from Tahlequah OK, adopting the maximum number of animals allowed under the AIP program. Six of the 12 individuals adopted multiple rounds of animals, with three individuals adopting AIP animals three times. The total number of animals adopted through the AIP by the group is a minimum of **84 BLM horses or burros**. This family received approximately \$84,000 in federal incentive money. So far eight of the adopted animals have been documented in kill pens, raising serious questions about the current location and well-being of the remaining animals. See Appendix 6 for further details.
- A set of documents from the BLM Idaho State Office, obtained by AWHC under FOIA, showed yet another group of nine related individuals each adopting the maximum number of burros allowed, pocketing \$36,000 in incentive payments. One of the family members

works or worked for a large livestock auction. Photos received through FOIA show a shockingly large number of burros (estimated 40-50) in a pen. The sheer number of burros adopted through the AIP and held in a single location raises questions about the intent of the adopters and questions about the current location of these animals.



E. Identified Slaughter “Hotspots”

AWHC’s investigation has revealed “slaughter hotspots” within Texas, Oklahoma, New Mexico, and Kansas. To date, the majority of the horses and burros identified in this report were documented in kill pens located in these states. Further, these states are within the jurisdiction of the BLM’s New Mexico State Office. Over 62 percent of the horses and burros identified as having been adopted through the AIP in this report were adopted through this office, with the remainder distributed between four other state offices. AWHC investigators mapped out the locations of all AIP adopters who sent their animals to kill pens to visually show the hotspots identified. Each blue dot represents an individual adopter and each orange dot identifies a family or group of related individuals that adopted multiple animals at a time and then sent them to slaughter auctions. Each red dot represents a known kill pen that BLM wild horses and/or burros were identified at.



V. THE KILL PENS

All of the livestock auctions mentioned in this report are self-identified in the public domain as selling horses for slaughter, either directly or through middlemen. Many of these operate on Facebook, and will publicly identify themselves as shipping animals to slaughter. While horse slaughter plants cannot operate in the U.S. since Congress has not provided funding for USDA inspections of horse slaughter plants, these pens have become an entryway for thousands of American equines to be exported across the border to horse slaughter plants in Canada and Mexico. A few examples:

- Fabrizio Livestock Auction, Colorado is run by Jason Fabrizio, who claimed in a [2018 Denver Channel article](#) that he regularly sends 34 horses a week across the border for slaughter in Mexico. Fabrizio stated, “I buy them, and I buy them by the truckloads. And we send them to Mexico.” Fabrizio is one of the auctions that blacked out BLM brands on horses advertised on Facebook.
- Peabody Horse Auction in Kansas announces on its [Facebook page](#): “This is a kill pen so nothing is guaranteed with any horse.”

- Stroud Oklahoma Kill Pen is [self-identified](#) in its name as a kill pen. The auction states on its [website](#), “Yes we are a kill pen.”
- Kaufman Kill Pen, in Texas, is also self-identified in its name as a kill pen. It’s run by Mike McBarron, who was identified in a [2019 USA Today article](#) as one of the most “prolific” kill buyers in the country.
- Bowie Livestock Auction, in Bowie Texas, is a self-identified slaughter auction. AWHC recently obtained records that included Veterinary Health Certificates for the Export of Immediate Slaughter Horses from the United States of America that names O’Dwyer Investments (the O’Dwyers own Bowie Livestock Auction) as the exporter of horses for slaughter.

See **Appendix 7** for documentation.

VI. BLM REFORMS TO THE AIP ARE INADEQUATE TO ADDRESS THE PROBLEM

As noted above, the BLM reforms, as codified in [Instruction Memorandum \(IM 2022-014\)](#) are not sufficient to stem the flow of wild horses and burros into kill pens. For example, the changes:

- *Weakened* protections against slaughter, by adding the word “knowingly” to the certification signed by adopters, under penalty of prosecution, that they will not sell their adopted animals to any person or organization that intends to resell, trade, or give away such animals for slaughter or processing into commercial products. This increases the burden of proof and makes prosecutions for providing false statements regarding this certification more difficult.
- *Relaxed* the rules barring “immediate family members” of BLM employees. By doing so, the new IM increases the risk that individuals closely affiliated with BLM employees may take advantage of the AIP, a striking relaxation of rules given the involvement of BLM employees and their family members in previous agency slaughter scandals.
- *Expanded* the time between compliance inspections and titling by requiring that inspections be conducted at six months, meaning that at least six months will pass between the time the inspection occurs and the time that the horses are titled.

Previous definition of immediate family member - “spouse, domestic partner, cohabitant, child, stepchild, grandchild, parent, stepparent, mother-in-law, father-in-law, son-in-law, daughter-in-law, grandparent, great grandparent, aunt, uncle, niece, nephew, or first cousin (that is, a child of an aunt or uncle), sibling, half-sibling, stepsibling, brother-in-law, sister-in-law, including adoptive relationships).”

New definition: “immediate household (defined as spouse and any dependents 18 years old and older).”

Issues that remain unaddressed in the agency’s reform include:

- The core problem of \$1,000 cash payments per horse or burro for the adoption of up to four animals per person per year.

- The problem of virtual compliance inspections and the inability to verify the actual condition and location of animals.
- Limiting screening of adopters to a database of previous adopters, leaving the many new adopters attracted to the program by the cash incentives unscreened.

Other measures, such as raising the adoption fee from \$25 to \$125 and paying the incentive in one installment after titling instead of in two payments are not likely to sufficiently dampen the profit motive of adopters seeking to defraud the program.

Please see **Appendix 8** for a detailed analysis of the changes and their impacts.

VII. CONCLUSION AND RECOMMENDATIONS

The evidence laid out in this report irrefutably demonstrates that the BLM's AIP has become a vehicle to send hundreds, potentially thousands, of wild horses and burros into the slaughter pipeline. The program is being abused – and taxpayers are being defrauded – by individuals who are pocketing the cash incentives, then flipping their adopted horses and burros to kill pens in direct violation of their adoption agreements. These agreements, signed under penalty of prosecution, attest that the adopters will not sell their animals for slaughter or to any person or organization that intends to resell or give away such animals for slaughter.

AWHC's investigation shows that this issue is not isolated to a few individuals, but instead is an epidemic within the AIP, with the epicenter of instances investigated so far within the BLM's New Mexico State Office. With record numbers of BLM horses and burros adopted and large numbers of BLM animals flooding into slaughter auctions, the AIP has essentially become a laundering mechanism to rid the BLM of the animals it is charged to preserve while skirting a Congressional slaughter prohibition.

AWHC presented both the Department of the Interior and the BLM with its findings in May of 2021. However, the BLM took no meaningful steps to investigate or address the problem. Since that time, AWHC has identified hundreds more wild horses and burros in kill pens, with 72.8 percent identified by AWHC by brand number confirmed as AIP animals. (The remainder are awaiting confirmation pending receipt of FOIA records.)

Instead of addressing this animal welfare crisis, the BLM is attempting to skirt responsibility for it by asserting that instances in which horses and burros wind up in kill pens and happen to be rescued represent the “successful private re-homing of animals originally adopted from BLM.” (**Appendix 9**). In this manner, the agency is placing the burden of management and protection of these animals on privately funded rescue organizations, while remaining silent about the fate of those wild horses and burros who are not rescued and are sent to slaughter. The influx of unhandled, untamed equines that have flooded the market as a result of the AIP has now exceeded the capacity of rescue groups to save them. This crisis increases the likelihood that

federally protected animals are being sent to slaughter, either directly shipped by the kill pens or sold to middlemen known as kill buyers who sell them to slaughter plants across the border.

The 1971 Wild Free-Roaming Wild Horses and Burros Act protects these iconic animals as “living symbols of the historic and pioneer spirit of the West” and because “they contribute to the diversity of life forms within the Nation and enrich the lives of the American people.” (16 USC Ch. 30). The AIP is another example of the BLM failing to uphold the original intentions of the Act and failing to protect wild horses and burros from slaughter.

With the fate of the 60,000 wild horses and burros currently confined in government holding facilities – and the 19,000 more targeted for removal from the wild this year – at stake, the BLM must prioritize responsible adoption and immediately implement meaningful changes to the AIP. Specifically, the AWHC recommends the following reforms:

1. **Abandon cash incentives.** The agency’s decision to pay \$1,000 to adopters after 12 months instead of two installments (\$500 upon adoption and \$500 after titling) does not eliminate the profit incentive to sell the horses or burros at slaughter auctions. Instead, the BLM must eliminate the cash incentives, and shift the program toward a voucher-based approach to support the care and training of adopted animals. This is consistent with the July 2021 Wild Horse and Burro Advisory Board [recommendation](#) (#4): “*The Board recommends pursuing alternative, non-cash incentives to ensure a high standard of welfare for adopted wild horses and burros.*” The BLM already has a structure in place for issuing vouchers and bank transfers as part of its [existing gelding incentive](#) and animal replacement programs. Such vouchers would help offset the cost of the initial care of the wild horse or burro and/or training costs. Because the administrative system is already in place for vouchers, this change would not require an increase in time and staffing, but rather a shift in resource allocation.
 - a. If the agency insists on keeping cash incentives, it should change policy to provide payments only after the adopter meets specific training requirements, as was proposed in a 2016 BLM Wild Horse and Burro Adoption Assistance Pilot Program funding proposal. (**Appendix 10**). This alternative program considered assistance as potentially a “set payment when the adopter applies for title to the animal at the end of one year if the horse or burro has been humanely cared for and meets the halter and saddle training milestones.” The proposal goes on to define these milestones as “*Halter trained is an animal that may be approached, caught and haltered in an open restricted area, led safely from one area to another, stand tied, allow its feet to be picked up, and loaded into a trailer.*” And that, “*Saddle trained is an animal that has successfully mastered all the components of the halter trained animal and has the ability to be ridden at a walk and trot.*” This would increase the value of the adopted animal and according to the BLM’s own internal State Leads Meeting notes, would “*reduce the chance of the animal showing up at slaughter.*” (**Appendix 10**).

- b. If the agency chooses to implement this alternative, it should add additional screening to its adoption application that includes, but is not limited to, questions such as those mentioned in the Assistance Pilot Program Proposal and those proposed by AWHC:
 - i. Describe your experience working with horses that have little to no prior training, and/or horses that needed “re-training” in some way.
 - ii. Have you ever worked with wild horses or burros before?
 - iii. Describe your training methods and training philosophy. How did you learn and develop these methods?
 - iv. How has your prior experience prepared you to work with BLM wild horses that have only had, at most, minimal handling or training?
 - v. Provide contact information for at least 3-4 references (one must be a licensed practicing veterinarian and one must be a farrier) willing to be contacted by the BLM regarding your training skills and experience.

If the incentive animal(s) does not meet the training requirements or has been treated inhumanely, no incentive will be provided, the animal(s) must be relinquished from the adopter, and the adopter should be banned from participating in any BLM adoption or sales.

- 2. **Strengthen its contractual language in adoption agreements** to ensure the wellbeing of wild horses and burros as directed by the U.S. House of Representatives in FY 2022 appropriations legislation, stating, *“Specifically, the Bureau is to review its Adoption Incentive program and work with the Office of the Solicitor to strengthen contractual language and address any weakness in the program that would jeopardize the welfare of these animals.”* The BLM’s July 2021 modifications to the AIP actually did the opposite by *weakening* contractual language. (See section II. B. above).
- 3. **Improve and increase compliance inspection process and abandon virtual inspections.** Currently, the BLM utilizes few in-person compliance inspections and many virtual compliance inspections that require the adopter to send a minimum of five photos of the animal to ensure compliance and title eligibility. A virtual compliance inspection cannot accurately determine if a horse or burro has access to clean water and forage or if they are being cared for in a humane way. FOIA records also reveal that virtual compliance checks frequently verify the identity of the animal-based on physical characteristics, which are described by the signalment key, instead of the BLM freeze brand or microchip. This is not an accurate way to verify a BLM animal’s identity, as many horses can have the same physical characteristics, such as coloring and markings. Instead, the BLM must ensure that any animal adopted through the AIP undergoes **two mandatory in-person compliance inspections conducted by BLM officials**, one at the six-month mark and one at the twelve-month mark to ensure the animal(s) are treated

humanely. To successfully complete these mandatory in-person inspections, the agency must increase capacity to conduct in-person inspections with qualified personnel and volunteers trained to identify equines based on freeze brands and/or scanning for microchips, as well as in equine nutrition and care in order to spot abuse and neglect.

4. **Increase adoption fee:** In 2018, the BLM changed its adoption fee from \$125 to \$25 for unhandled wild horses and burros. This change made adopting wild horses and burros with the intent to resell them at a higher price at a slaughter auction, more profitable. In the January 26, 2022 reforms to the AIP, BLM returned to the \$125 adoption fee. AWHC believes that this \$100 difference is not sufficient to combat the flow of BLM equines into the slaughter pipeline since it does not eliminate the economic incentive to flip the animals to kill pens. The BLM should increase the adoption fee from \$125 to at least \$250 for unhandled animals and \$450 for trained animals.
5. **Screen new adopters for past charges** of animal abuse, neglect, or the sale of BLM animals to self-identified kill pens. Currently, the BLM has one question on its adoption and sale application asking if a person has ever been convicted of animal abuse or neglect, but the agency does not run background checks or any substantive screening of new adopters before they adopt an animal or pay a cash incentive. Per the BLM's website, it only screens potential adopters by running their names through a list of individuals who have previously adopted BLM animals and been determined ineligible. This limits the screening of adopters and provides no screening for the significant number of new adopters who have been attracted to the program by the cash incentives. (Adoptions increased from the pre-AIP level of 3,158 in 2018 to the post-AIP level of 7,369 in 2021.) In order to ensure wild horses and burros are adopted or sold into good homes, the BLM must start running background checks on potential adopters or purchasers, especially if the adopter has opted into the incentive program and is set to receive federal payouts.
6. **Strict limit on the number of animals adopted to one address.** Currently, the BLM allows a maximum of four untitled animals to be adopted by one person and one address. However, an individual may request to adopt and house more than four BLM animals at one location by contacting the person's local BLM office. As AWHC's investigation shows, such waivers are routinely being granted by the agency. Families are adopting the per-person maximum number of animals, holding them at the same address, and then sending them to slaughter auctions as a group. AWHC has documented instances of 13, 20, and even 40-50 BLM animals held at one location. (See **Appendices 5 and 6**, respectively). To decrease the financial benefit of this scheme, AWHC recommends limiting the number of animals adopted through the AIP to **two per individual**, and **four to one address with no exceptions**. Only verified and pre-approved/inspected 501(c)(3) sanctuaries should be authorized to adopt larger numbers of animals.

7. **Adopters with violations must relinquish animals and return incentives.** In order to ensure the safety and well-being of any animals, all adopters deemed ineligible for AIP due to violations of their Private Care and Maintenance Agreement must relinquish **all animals in their care** and **must return any incentive payments received**. The latter was recommended by the agency in its [year one report](#) on the AIP, but never implemented.
8. **Add the microchip number and special AIP notation to each title.** In order to facilitate tracking of adopted BLM animals, the BLM must immediately include the microchip number of all adopted animals on the certificate of title, along a special notation designating the animal as AIP along with the BLM freeze brand and the signalment key.
9. **Proactively make adoption information available to the public.** BLM should proactively make available all information about wild horses and burros adopted or titled through the AIP. As a condition for receiving incentives, BLM could require adopters to agree that their information (names, numbers of horses adopted, etc) will be posted online. This would increase transparency and reduce the burden of investigating the agency to determine whether it is complying with the congressional intent to prevent the slaughter of wild horses.

Appendices:

1. APPENDIX 1: [BLM Wild Horses and Burros in Kill Pens: Confirmed as AIP](#)
2. APPENDIX 2: [BLM Wild Horses and Burros in Kill Pens: Pending Confirmation](#)
3. APPENDIX 3: [Wild Horses and Burros Advertised as BLM Animals: Unidentified Due to Obscuring of Brands](#)
4. APPENDIX 4: [Signed Example of Adoption Incentive Agreement](#)
5. APPENDIX 5: [Repeat Offenders](#)
6. APPENDIX 6: [Families of Concern](#)
7. APPENDIX 7: [The Kill Pens](#)
8. APPENDIX 8: [AWHC's Reforms Analysis](#)
9. APPENDIX 9: [BLM Communications](#)
10. APPENDIX 10: [BLM Alternative Incentive or Assistance Programs](#)
11. APPENDIX 11: [Animals confirmed to not be AIP](#)

