

UNITED STATES DEPARTMENT OF AGRICULTURE -4 PM 3:25

BEFORE THE SECRETARY OF AGRICULTURE

RECEIVED

|                 |   |                    |
|-----------------|---|--------------------|
| In re:          | ) | Docket No. 13-0012 |
|                 | ) |                    |
| Willa Mae Page, | ) |                    |
|                 | ) |                    |
| Respondent.     | ) | Complaint          |

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

I

A. Willa Mae Page, hereinafter referred to as the respondent, is an individual with a business mailing address at 9115 Highway AH, Huggins, MO 65484.

B. The respondent, at all times material herein, was not a licensed dealer as defined in the Act and the regulations.

II

On or about November 14, 2007, respondent operated as a dealer by selling approximately 29 dogs at an auction without a valid USDA license, in willful violation of section 2.1(a)(1) of

the regulations (9 C.F.R. § 2.1(a)(1)).

### III

On or about May 24, 2008, respondent operated as a dealer by selling approximately 11 dogs at an auction without a valid USDA license, in willful violation of section 2.1(a)(1) of the regulations (9 C.F.R. § 2.1(a)(1)).

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

The Animal and Plant Health Inspection Service requests:

1. That unless the respondent fails to file an answer within the time allowed therefor, or files an answer admitting all the material allegations of this complaint, this proceeding be set for oral hearing in conformity with the Rules of Practice governing proceedings under the Act; and

2. That such order or orders be issued as are authorized

by the Act and warranted under the circumstances, including an order:

(a) Requiring the respondent to cease and desist from violating the Act and the regulations and standards issued thereunder;

(b) Assessing civil penalties against the respondent in accordance with section 19 of the Act (7 U.S.C. § 2149); and

(c) Permanently disqualifying the respondent from obtaining a license under the Act.

Done at Washington, D.C.  
this 31<sup>st</sup> day of August, 2012



*Acting*

\_\_\_\_\_  
Administrator  
Animal and Plant Health  
Inspection Service

BRIAN HILL  
Attorney for Complainant  
Office of the General Counsel  
United States Department of  
Agriculture  
Washington, D.C. 20250-1400  
Telephone (202) 720-9237

13-0012

7005 1160 0002 7836 2079

**U.S. Postal Service™**  
**CERTIFIED MAIL™ RECEIPT**  
*(Domestic Mail Only; No Insurance Coverage)*

For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICE**

|   |    |
|---|----|
| Postage   | \$ |
| Certified Fee                                     |    |
| Return Receipt Fee<br>(Endorsement Required)      |    |
| Restricted Delivery Fee<br>(Endorsement Required) |    |
| Tr  |    |
| Se.   |    |

**Willa Mae Page**  
**9115 Highway AH**  
**Huggins, MO 65484**

Postmark Here

Street, Apt., or PO Box  
City, State, Zip

PS Form 3800, June 2002 See Reverse for Instructions