

BAT WORLD SANCTUARY and  
AMANDA LOLLAR,

Plaintiffs,

vs.

MARY CUMMINS,

Defendant Pro se

§ IN THE DISTRICT COURT

§ TARRANT COUNTY, TEXAS

§ 352nd JUDICIAL DISTRICT

**DEFENDANT'S RESPONSE AND OBJECTION TO PLAINTIFFS' MOTION TO  
AMEND TEMPORARY INJUNCTION**

TO THE HONORABLE JUDGE OF SAID COURT:

Mary Cummins, Defendant Pro se, files this response and objection to Plaintiffs' motion to amend temporary injunction and in support shows the following:

1. On May 4, 2011 this court with Judge William Brigham presiding heard a motion for temporary injunction against Defendant. Defendant and court were at that time presented with Plaintiffs' list of approximately 100 different Internet URLs which Plaintiff wanted Defendant to remove (Attached to Exhibit 1 court order).

2. Plaintiffs told the court that the URLs were defamatory but showed no evidence to support this. Defendant stated that everything which Defendant posted about Plaintiff was the truth and therefore not defamatory. Furthermore the items Defendant posted were in the public interest and privileged freedom of speech.

3. Defendant also stated that Defendant only controlled a few of the URLs on the list. Defendant had not posted anything to the other URLs and in fact, had never even seen them before that time. Defendant stated in court Defendant had no ability or authority to remove items from other people's websites.

1 4. Despite the fact that Defendant cannot possibly remove other people's websites  
2 on May 4, 2011 this Court under order of presiding Judge William Bringham signed a  
3 temporary injunction ordering Defendant to remove the listed URLs from the Internet.  
4 The order was pre-written by Plaintiffs' attorney Randy Turner (Exhibit 1).

5 5. Plaintiffs did not post a bond at this time. The injunction was therefore void.

6 6. Even though Defendant knew the injunction was void Defendant immediately  
7 removed all of the URLs which she controlled. She did not remove the other URLs  
8 because she did not post those items and cannot possibly remove other people's web  
9 pages.

10 7. Even though this void injunction was only against Defendant, Plaintiffs' attorney  
11 Randy Turner sent letters to the owners of the other websites attaching the void  
12 injunction. Turner demanded that they remove the items on the void injunction thereby  
13 squashing the freedom of speech of other completely unrelated parties.

14 8. Most of the websites removed the URLs but Indymedia refused. ACLU-NC which  
15 represents Indymedia replied to Turner's demand letter as follows (Exhibit 2):

16 "Re: *Bat World Sanctuary et al. v. Cummins*, No 352-248169-10

17 Dear Mr. Turner:

18 I am writing on behalf of the San Francisco Bay Area Indymedia ("Indybay") and  
19 the American Civil Liberties Union of Northern California. It has come to our  
20 attention that you have sent a demand to Indybay that it remove a webpage<sup>1</sup>  
21 from its website - a webpage that includes texts, photos, and videos concerning  
22 Ms. Amanda Lollar and Bat World Sanctuary, as well as links to comments on  
that initial posting - and have threatened to add Indybay as a defendant in your  
lawsuit against Ms. Mary Cummins if it does not immediately comply.

23 Indybay will not remove these materials. Under § 230 of the Communications  
24 Decency Act, operators of websites such as Indybay cannot be forced to censor  
25 articles and other information that, like the materials here at issue, originate with  
a third party, even if those materials are defamatory or otherwise objectionable.

1 Moreover, Indybay has a First Amendment right to display factually accurate  
2 materials, including videos and photographs, even if they were acquired  
unlawfully by a third party. Your demand that Indybay remove the entire

3 webpage, which includes not just the initial post but also links to material  
4 supporting and disputing the accuracy of that post as well as information relating  
5 to your clients' lawsuit against Ms. Cummins, is clearly overbroad; complying with  
it would result in the censorship of materials that are clearly protected by the First  
Amendment, including materials that support Ms. Lollar and Bat World Sanctuary.

6 In short, whatever the merits of your clients' dispute with Ms. Cummins, Indybay  
7 may properly maintain its webpage under § 230 of the First Amendment. Please  
8 let me know if you continue to believe that Indybay has any duty to remove these  
materials from its website or have any questions or concerns about this. My  
9 direct phone number is (415) 293-6373; my email is [mrisher@aclunc.org](mailto:mrisher@aclunc.org).

10 Sincerely,

11 Michael T. Risher

12 Staff Attorney

13 cc: ACLU of Texas

14 1. Specifically, <http://www.indybay.org/newsitems/2011/05/01/18678593.php>"

15  
16 9. Plaintiffs' attorney Randy Turner then sent a letter with the attached void injunction  
17 to Google improperly demanding that they remove the URLs from their search engine  
18 results. Google consented and removed the items from search results.

19 10. On May 16, 2011 even though Plaintiffs knew the injunction was void they filed a  
20 motion for contempt because Defendant did not remove other people's websites.  
21 Plaintiffs have never requested a hearing on this motion to this day.

22 11. On July 15, 2011, after Plaintiffs finally posted a bond, a writ of injunction was  
23 issued ordering Defendant to remove those URLs from the Internet.

24 12. October 4, 2011 Plaintiffs filed a motion to amend the temporary injunction.  
25 Plaintiffs seek to add even more URLs to be removed. Again, most of these URLs were

1 not posted by Defendant. They are posted on websites owned and controlled by others  
2 (Exhibit 3). Some were posted by robots. In fact two of the items are not about Plaintiffs.  
3 They are unrelated articles about Plaintiffs' attorney Randy Turner (Exhibit 4, 5).

4 13. The other URLs which Plaintiffs want added to the injunction list are pages from  
5 Defendant's website (AnimalAdvocates.us). They have listed URL [http://](http://www.AnimalAdvocates.us/BatWorldLawsuit)  
6 [www.AnimalAdvocates.us/BatWorldLawsuit](http://www.AnimalAdvocates.us/BatWorldLawsuit) and 20 sub URLs which contain pdf files of  
7 the results of Freedom of Information Act (FOIA) and State Information Act requests  
8 concerning Plaintiffs. They are the following public documents (Exhibits 6-23); United  
9 States Department of Agriculture (USDA) FOIA acknowledgment letter, Texas Parks &  
10 Wildlife Department (TPWD) response to information act request, Letter from the Texas  
11 Health Department stating that Plaintiff is breaking the law, City Building and Safety  
12 complaints against Plaintiffs, police reports about Plaintiffs, complaints to City of Mineral  
13 Wells about Plaintiffs, City incident report about a rabid bat biting a toddler on the face  
14 directly next door to Plaintiffs' bat maternity colony, TPWD report about Plaintiffs  
15 breeding bats against their permit, City reports about foul odor coming from Plaintiffs'  
16 building and 11 reports against Plaintiffs made to authorities by individuals other than  
17 Defendant. All of these items are public documents in the public interest and therefore  
18 privileged freedom of speech.

19 14. Defendant requests that this court denies Plaintiffs' Motion to Amend Temporary  
20 Injunction because it is overly broad. Defendant cannot possibly remove other people's  
21 websites. If Plaintiffs want those items removed, Plaintiffs need to sue the owners of  
22 those websites and get an injunction against them, not Defendant. Defendant only has  
23 control over Defendant's own websites.

24 15. Defendant requests that this court denies Plaintiffs' Motion to Amend Temporary  
25 Injunction because the items which Defendant did indeed post are the truth and

1 therefore not defamatory. In fact most of what is posted in Defendant's website  
2 concerning Plaintiffs is public documents or legal filings. The items posted are in the  
3 public interest and are protected under the First Amendment of the Constitution of the  
4 United States and under Section 8, Article I, of the Constitution of the State of Texas.

5 16. Defendant requests that this court denies Plaintiffs' Motion to Amend Temporary  
6 Injunction as Plaintiffs have wholly failed to provide any evidence to support said  
7 Motion. The majority of Plaintiffs' arguments are nothing more than conjecture and  
8 conclusion with no cited evidence. Plaintiffs failed to attach any of the cited evidence. As  
9 such, Plaintiffs' Motion is not properly supported and should be denied.

10 17. Defendant further requests that the original injunction be void for being overly  
11 broad, failing to show any evidence, failing to show that the items were posted by  
12 Defendant, failing to show that the Defendant controlled those websites and failing to  
13 show that the items were indeed false and defamatory.

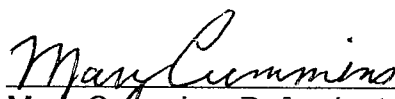
14 Respectfully submitted,

15  
16 Mary Cummins, Defendant Pro se  
17 645 W 9<sup>th</sup> St, #110-140  
18 Los Angeles, CA 90015-1640  
19 Phone 310-877-4770  
20 Email: [Mary@AnimalAdvocates.us](mailto:Mary@AnimalAdvocates.us)

21 By:   
22 Mary Cummins, Defendant Pro Se  
23  
24  
25

CERTIFICATE OF SERVICE

I, Mary Cummins, hereby certify that a TRUE COPY of the above **DEFENDANT'S RESPONSE AND OBJECTION TO PLAINTIFFS' MOTION TO AMEND TEMPORARY INJUNCTION** was served on the Plaintiffs' Attorney of record by FAX and by FIRST CLASS MAIL at  
Randy Turner  
Turner & McKenzie  
1800 N. Norwood Dr # 100  
Hurst, Texas 76054  
Fax: 817-268-1563  
this 17<sup>th</sup> Day of October, 2011

  
\_\_\_\_\_  
Mary Cummins, Defendant Pro se  
645 W 9<sup>th</sup> St, #110-140  
Los Angeles, CA 90015-1640  
Phone 310-877-4770

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BAT WORLD SANCTUARY and  
AMANDA LOLLAR,  
*Plaintiffs*

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IN THE DISTRICT COURT

v.

TARRANT COUNTY, TEXAS

MARY CUMMINS,  
*Defendant*

352nd JUDICIAL DISTRICT

TEMPORARY INJUNCTION

On the 4<sup>th</sup> day of May, 2011 came on to be heard the application for a temporary injunction filed by the plaintiffs. The plaintiffs appeared by and through their attorney of record. The defendant, Mary Cummins, appeared in person. After hearing the evidence and considering the evidence the Court finds that the defendant has published on the internet defamatory statements and that the plaintiffs' application for a temporary injunction should be granted.

IT IS THEREFORE ORDERED that Mary Cummins immediately remove from the internet all of the materials concerning Bat World Sanctuary and Amanda Lollar which have been posted or placed on the internet at the following URL's and locations:

CARE2.COM

<http://www.care2.com/news/member/325453706/2794699>

TRFACE.COM

[http://trface.com/video/HZivBTg\\_6eg/bat-most-likely-with-rabies-found-in-mineral-wells-texas-at-bat-world.html](http://trface.com/video/HZivBTg_6eg/bat-most-likely-with-rabies-found-in-mineral-wells-texas-at-bat-world.html)

FRIENDFEED.COM

<http://friendfeed.com/indybay/4c181f9f/amanda-lollar-commits-animal-cruelty-at-bat>

ANIMALSUFFERING.COM

<http://www.animalsuffering.com/forum/viewtopic.php?t=9417>

TOPIX.COM

<http://www.topix.com/member/profile/animalcruelty>

INDYBAY.ORG

<http://www.indybay.org/newsitems/2011/05/01/18678593.php>

[http://www.indybay.org/newsitems/2011/05/01/18678593.php?show\\_comments=1#18678719](http://www.indybay.org/newsitems/2011/05/01/18678593.php?show_comments=1#18678719) -

BLOGSPOT:

<http://amanda-lollar-bat-world-sanctuary-bad.blogspot.com/>

FACEBOOK:

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

<http://www.facebook.com/marycummins> -

YOUTUBE:

<http://www.youtube.com/marycummins>

[http://www.youtube.com/watch?v=HZivBTg\\_6eg](http://www.youtube.com/watch?v=HZivBTg_6eg)

<http://www.youtube.com/watch?v=ujG1sHYC1d4>

<http://www.youtube.com/watch?v=cUZepj1GvHU>

<http://www.youtube.com/watch?v=Xha2TpsW6qs>

<http://www.youtube.com/watch?v=WxN97rXZAIq>

<http://www.youtube.com/watch?v=4X1lmuQVMVI> -

<http://www.youtube.com/watch?v=kndNLXgGizM&feature=autoplay&list=PL2102200B7DD9D60F&index=70&playnext=3>

<http://www.youtube.com/watch?v=kyCp0DBmS0Y>

[http://www.youtube.com/watch?v=aBZLpk\\_m7Lo](http://www.youtube.com/watch?v=aBZLpk_m7Lo)

<http://www.youtube.com/watch?v=-uyzq4sezsM>

<http://www.youtube.com/watch?v=kndNLXgGizM>

[http://www.youtube.com/watch?v=nIKC3zwwf\\_g](http://www.youtube.com/watch?v=nIKC3zwwf_g)

<http://www.youtube.com/watch?v=aX8qBqFLDIc>

<http://www.youtube.com/watch?v=V0kah0Ej1g>

[http://www.youtube.com/watch?v=88pXZZ8\\_97g](http://www.youtube.com/watch?v=88pXZZ8_97g)

<http://www.youtube.com/watch?v=n3q5ugAJKCU>

<http://www.youtube.com/watch?v=IFqIKZLNtgw>

<http://www.youtube.com/watch?v=BtnJ6-ML26I>

FLICKR

<http://www.flickr.com/photos/62520886@N08/>

<http://www.flickr.com/photos/62357242@N04/>

<http://www.flickr.com/photos/62357242@N04/sets/72157626616455966/>

[www.flickr.com/photos/marycummins/4749355505](http://www.flickr.com/photos/marycummins/4749355505)

[www.flickr.com/photos/marycummins/4749354583](http://www.flickr.com/photos/marycummins/4749354583)

[www.flickr.com/photos/marycummins/4749997958](http://www.flickr.com/photos/marycummins/4749997958)

[www.flickr.com/photos/marycummins/4749996890](http://www.flickr.com/photos/marycummins/4749996890)

[www.flickr.com/photos/marycummins/4749997152](http://www.flickr.com/photos/marycummins/4749997152)

[www.flickr.com/photos/marycummins/4749355337](http://www.flickr.com/photos/marycummins/4749355337)

[www.flickr.com/photos/marycummins/4749354735](http://www.flickr.com/photos/marycummins/4749354735)

[flickriver.com/photos/marycummins/tags/tree](http://flickriver.com/photos/marycummins/tags/tree)

APNI:

<http://videos.apnicommunity.com/Video,Item,1036287809.html>

<http://videos.apnicommunity.com/Video,Item,1022972594.html>

<http://videos.apnicommunity.com/Video,Item,1609073450.html>

<http://videos.apnicommunity.com/Video,Item,1783861057.html>



<http://videos.apnicommunity.com/Video,Search,+,Channel,YouTube.html>  
<http://videos.apnicommunity.com/Video,Item,1201602253.html>  
<http://videos.apnicommunity.com/Video,Item,72057661061818466.html>  
<http://videos.apnicommunity.com/Video,Item,72057660295290434.html>  
<http://videos.apnicommunity.com/Video,Item,12568395.html>

WITTY SPARKS

[videos.wittysparks.com/id/192472557](http://videos.wittysparks.com/id/192472557)  
<http://videos.wittysparks.com/id/1201602253>

MUFT.TV

[www.muft.tv/watch/Video,Item,192472557.html](http://www.muft.tv/watch/Video,Item,192472557.html)

WN.COM

[http://wn.com/Baby\\_brown\\_Mexican\\_free\\_tail\\_bat\\_pups\\_after\\_being\\_fed,\\_Mary\\_Cummins,\\_Animal\\_Advocates](http://wn.com/Baby_brown_Mexican_free_tail_bat_pups_after_being_fed,_Mary_Cummins,_Animal_Advocates)  
[http://wn.com/Feeding\\_a\\_pregnant\\_brown\\_bat\\_meal\\_worms,\\_Mary\\_Cummins,\\_Animal\\_Advocates](http://wn.com/Feeding_a_pregnant_brown_bat_meal_worms,_Mary_Cummins,_Animal_Advocates)

NATURE TALK

<http://nature-talk.com/video/wildlife/bats/feeding-a-baby-bat-9.cgi>

VIDEOWIRED:

<http://www.videowired.com/video/12568395/>

MY ANIMAL CLIPS

<http://myanimalclips.com/video/4607>

YIDIO

<http://www.yidio.com/baby-bat-pup-nursing--bat-world-mary-cummins-animal-advocates/id/36028846047465281>

<http://www2.yidio.com/batbatmary-cummins/72057641295136587>

HIVEMIND:

[fiveprime.org/hivemind/Tags/pups,wildlife](http://fiveprime.org/hivemind/Tags/pups,wildlife)

MEFREEDIA:

<http://www.mefreedia.com/watch/31686664>

FUNNY ANIMAL VIDEOS

<http://www.funny-animal-videos.funny-pictures-jokes.com/index.php?page=watch&youtube-video=n3q5ugAJKCU&player&id=111&animal=bat&video=Wild%20bats,%20Mary%20Cummins,%20Animal%20Advocates>

MYVIDEO1

[http://www.myvideo1.com/AZzYEMUtGehNFMshnUrtWP\\_baby-brown-mexican-free-tail-bat-pups-af](http://www.myvideo1.com/AZzYEMUtGehNFMshnUrtWP_baby-brown-mexican-free-tail-bat-pups-af)

VIDEOMUSICPOPULAR.COM:

<http://www.videomusicpopular.com/tag/mary+cummins/10>  
<http://www.videomusicpopular.com/tag/mary+cummins/11>

f=fbx\_album&fbid=436138206211

[http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437221966211#!/photo.php?pid=6329906&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=436231786211](http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437221966211#!/photo.php?pid=6329906&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=436231786211)

[http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437221966211#!/photo.php?pid=6334358&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=436439851211](http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437221966211#!/photo.php?pid=6334358&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=436439851211)

[http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437221966211#!/photo.php?pid=6338765&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=436615531211](http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437221966211#!/photo.php?pid=6338765&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=436615531211)

[http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437221966211#!/photo.php?pid=6338800&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=436615936211](http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437221966211#!/photo.php?pid=6338800&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=436615936211)

[http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437221966211#!/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437221966211](http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437221966211#!/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437221966211)

[http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437221966211#!/photo.php?pid=6356317&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437221971211](http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437221966211#!/photo.php?pid=6356317&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437221971211)

[http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437221966211#!/photo.php?pid=6356318&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437221976211](http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437221966211#!/photo.php?pid=6356318&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437221976211)

[http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437221966211#!/photo.php?pid=6375727&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437785221211](http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437221966211#!/photo.php?pid=6375727&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437785221211)

[http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437221966211#!/photo.php?pid=6376092&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437805611211](http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437221966211#!/photo.php?pid=6376092&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437805611211)

[http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437221966211#!/photo.php?pid=6376145&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437807361211](http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437221966211#!/photo.php?pid=6376145&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437807361211)

[http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437221966211#!/photo.php?pid=6375728&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437785226211](http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437221966211#!/photo.php?pid=6375728&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437785226211)

[http://www.facebook.com/photo.php?pid=6376092&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437805611211#!/photo.php?pid=6375841&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437790861211](http://www.facebook.com/photo.php?pid=6376092&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437805611211#!/photo.php?pid=6375841&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437790861211)

[http://www.facebook.com/photo.php?pid=6376092&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437805611211#!/photo.php?pid=6375924&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437794391211](http://www.facebook.com/photo.php?pid=6376092&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437805611211#!/photo.php?pid=6375924&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437794391211)

[http://www.facebook.com/photo.php?pid=6376092&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437805611211#!/photo.php?pid=6375925&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437794396211](http://www.facebook.com/photo.php?pid=6376092&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437805611211#!/photo.php?pid=6375925&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437794396211)

[http://www.facebook.com/photo.php?pid=6376092&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437805611211#!/photo.php?pid=6376165&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437807826211](http://www.facebook.com/photo.php?pid=6376092&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437805611211#!/photo.php?pid=6376165&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437807826211)

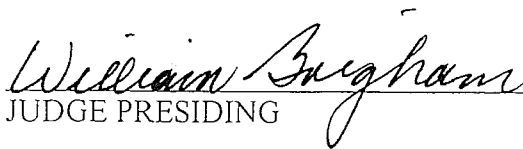
IT IS FURTHER ORDERED that Mary Cummins is prohibited from posting anywhere on the internet or publishing in any way any of the statements and photographs concerning Bat World Sanctuary or Amanda Lollar that appear at the URL's and locations listed above.

IT IS FURTHER ORDERED that Mary Cummins is prohibited from posting on the internet or publishing in any way any videos or pictures or written text describing procedures or techniques developed by Bat World Sanctuary, including holding techniques, feeding techniques, rehabilitation procedures, episiotomies and births, injection techniques, dental extractions, parasite removal, bathing, vaccinating, and treatments of injuries including wing repair and other routine procedures.

IT IS FURTHER ORDERED that Mary Cummins is prohibited from posting on the internet or publishing in any way any videos or photographs or written text describing rehabilitation set-ups developed by Bat World Sanctuary, including medical rooms, feeding rooms, and both rehabilitation and permanent bat caging, housing and flight areas.

This case is set for trial on \_\_\_\_\_

SIGNED this 4 day of May, 2011.

  
JUDGE PRESIDING



2

May 19, 2011

Via Fax and US Mail

Randall E. Turner  
Turner & McKenzie, PC  
Attorneys at Law  
1800 Norwood, Suite 100  
Hurst, Texas 76054  
Fax: 817-268-1563

Re: *Bat World Sanctuary et al. v. Cummins*, No. 352-248169-10

Dear Mr. Turner:

I am writing on behalf of San Francisco Bay Area Indymedia (“Indybay”) and the American Civil Liberties Union of Northern California. It has come to our attention that you have sent a demand to Indybay that it remove a webpage<sup>1</sup> from its website – a webpage that includes texts, photos, and videos concerning Ms. Amanda Lollar and Bat World Sanctuary, as well as links to comments on that initial posting – and have threatened to add Indybay as a defendant in your lawsuit against Ms. Mary Cummins if it does not immediately comply.


Indybay will not remove these materials. Under § 230 of the Communications Decency Act, operators of websites such as Indybay cannot be forced to censor articles and other information that, like the materials here at issue, originate with a third party, even if those materials are defamatory or otherwise objectionable. *Fair Housing Council of San Fernando Valley v. Roommates.Com, LLC*, 521 F.3d 1157 (9th Cir. 2008) (en banc); *Milo v. Martin*, 311 S.W.3d 210 (Tex.App. 2010); *Doe II v. MySpace Inc.*, 175 Cal.App.4th 561 (2009). As the Texas Court of Appeal has specifically observed, “section 230 does not provide a right to request a website’s owner to remove false and defamatory posts placed on a website by third parties, and does not provide the injured person with a remedy in the event the website’s owner then fails to promptly remove defamatory posts from its site.” *Id.* at 218.

<sup>1</sup> Specifically, <http://www.indybay.org/newsitems/2011/05/01/18678593.php>.

Moreover, Indybay has a First Amendment right to display factually accurate materials, including videos and photographs, even if they were acquired unlawfully by a third party. *Bartnicki v. Vopper*, 532 U.S. 514 (2001). Your demand that Indybay remove the entire webpage, which includes not just the initial post but also links to material supporting and disputing the accuracy of that post as well as information relating to your clients' lawsuit against Ms. Cummins, is clearly overbroad; complying with it would result in the censorship of materials that are clearly protected by the First Amendment, including materials that support Ms. Lollar and Bat World Sanctuary.

In short, whatever the merits of your clients' dispute with Ms. Cummins, Indybay may properly maintain its webpage under § 230 and the First Amendment. Please let me know if you if you continue to believe that Indybay has any duty to remove these materials from its website or have any questions or concerns about this. My direct phone number is (415) 293-6373; my email is [mrisher@aclunc.org](mailto:mrisher@aclunc.org).

Sincerely,



Michael T. Risher

Staff Attorney

cc: ACLU of Texas

3

Legal owners of URLs in motion to amend injunction  
(From allwhois.com)

1, 2, 10, 34. Indybay.org

Domain ID:D23109719-LROR  
Domain Name:INDYBAY.ORG  
Registrant ID:29664151-NSI  
Registrant Name:SF Bay Area IMC  
Registrant Organization:SF Bay Area IMC  
Tech ID:29664152-NSI  
Tech Street1:2940 16th St Ste 216  
Tech City:San Francisco  
Tech State/Province:CA  
Tech Postal Code:94103-3682  
Tech Country:US  
Tech Phone:+1.4156336349  
Tech Email:sfbay@lists.indymedia.org

3. laanimalwatch.blogspot.com

Owner of blog: Edward Muzika

Owner of domain Google

Google Inc.

1600 Amphitheatre Parkway  
Mountain View CA 94043  
US

dns-admin@google.com +1.6502530000 Fax: +1.6506188571

Domain Name: blogspot.com

4, 5. raisethefist.com Robot reposted content from Indymedia. Contact info is invalid.

Registrant:

Raise The Fist  
8371 Ash Ave  
Los Angeles, CA 91210  
US

Registrar: DOTSTER

Domain Name: RAISETHEFIST.COM  
Austin, Sherman blackstarliberation@yahoo.com  
Raise The Fist  
8371 Ash Ave  
Los Angeles, CA 91210  
US

703-555-5555  
blackstarliberation@yahoo.com

6. dallaseventscentre.com robot posted content

Hennes, Marc marchennes@hotmail.com  
5650 Arbor Hills Way  
The Colony, Texas 75056  
United States  
+1.2145646519

7. Twitter.com/untilallarefree

The ALF  
@untilallarefree Wherever there's a cage  
Until All Are Free  
<http://google.com/profiles/the.animal.liberation.front>  
Identity of the Animal Liberation Front is unknown

Domain owned by Twitter  
Organisation Name.... Twitter, Inc.  
Organisation Address. 795 Folsom Street  
Organisation Address. Suite 600  
Organisation Address. San Francisco  
Organisation Address. 94107  
Organisation Address. CA  
Organisation Address. UNITED STATES

8. maps.google.com

Comment made by user SpecialK, unknown. Defendant did not get "whelps" and did not make this comment.

Health Department 4113 Highway 180 E # B, Mineral Wells, TX 76067-8313

Bat World Sanctuary, 217 N. Oak Avenue, Mineral Wells, TX 76067 - Jul 4, 2010  
I attended an internship program on a grant to learn about treating and maintaining bat populations. At the Bat World facility I worked with bats for up to 15 hours a day and slept in a "guest" room on site. During the night I awoke several times with bites and severe itching. I believe these bites came from mites, bat mites or bed bugs. The owner/operator and her staff deny the presence of any pests but I am still suffering with these whelps even ten days later.

Google

9, 33. workingtohelpanimalstodaytomorrow.blogspot.com

Owner user HonestHelps, unknown. Blogspot owned by Google, see above.

10. Indymedia.org

Registrant Organization:IMC  
Registrant Street1:Rua Aldo Oliveira Barbosa, 72  
Registrant Street2:Parque das Universidades  
Registrant Street3:MunicApio de Campinas  
Registrant City:Sao Paulo  
Registrant State/Province:  
Registrant Postal Code:13086-030  
Registrant Country:BR  
Registrant Phone:+55.119491645  
Registrant Email:  
8e1db6f792d80e6663572c7d098ee6d0-1027080@contact.gandi.net

12-32. AnimalAdvocates.us This is the only domain in the list that Defendant Cummins owns and controls.

|                            |   |
|----------------------------|---|
| Registrant Name:           | mary cummins                            |
| Registrant Organization:   | Animal Advocates                        |
| Registrant Address1:       | 906 N. Doheny Dr. #214                  |
| Registrant City:           | Los Angeles (old address)               |
| Registrant State/Province: | ca                                      |
| Registrant Postal Code:    | 90048                                   |
| Registrant Country:        | United States                           |
| Registrant Country Code:   | US                                      |
| Registrant Phone Number:   | +1.3236511336 (old phone)               |
| Registrant Email:          | mmmaryinla@aol.com (current email addy) |

35. wikibats.blogspot.com

Blog owner unknown. Blogspot owned by Google.





4

**Regions**

- north coast
- central valley
- north bay
- east bay
- south bay
- san francisco
- peninsula
- santa cruz
- california
- us
- international

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**U.S. | Animal Liberation**

**Lawyer Randy Turner responsible for pitbull attack**

by Responsible Pet Guardianship  
Monday Aug 1st, 2011 5:17 PM

Randy Turner's favorite client fake Iraqi war veteran Steven Woods is in trouble with the law yet again. Two of his dogs including "dangerous dog" Mimi attacked Gary Latimer, his pregnant wife and their six month old baby last Thursday. If Fort Worth, Texas lawyer Randy Turner had not helped Steven Woods when his dogs attacked two elderly people last year, this last attack would never have happened. Turner should be held responsible.

**Topics**

- animal lib
- anti-war
- arts + action
- drug war
- education
- en español
- environment
- global justice
- government
- health/housing
- immigrant
- media
- labor
- igbti / queer
- police state
- racial justice
- womyn



steven-woods-randy-turner...

**International**

- americas
- haiti
- iraq
- palestine
- afghanistan

Last year Steven Woods' pitbulls got out of his house and attacked two elderly people. Woods was written up three times from April to June in 2010 because of his dangerous pitbulls. According to the Star Telegram "In one case, a 64-year-old woman was attacked and seriously injured by four pit bulls. A municipal court judge ruled in October that Steven Woods' dog Mimi was dangerous after finding evidence that she was involved in an attack on an 84-year-old man in July. In another instance, two police officers reported having to use pepper spray against two aggressive pit bulls that they said Woods acknowledged were his."

**More**

- make media
- get involved
- calendar
- gallery
- archives
- chat
- links

During the two day trial Turner kept saying that it was "malicious prosecution." In an email posted on the internet Turner writes "This is the worst case of malicious prosecution I have seen. Steven was told by the city attorney yesterday that that decision 'comes from the top', which obviously means someone way high up in city government." (sic)

Turner sent another email far and wide to try to encourage people to attack the City. "If anyone would like to let the city of Fort Worth know how they feel about this vindictive prosecution of a disabled American war hero here are the contacts. I am only sending this email to a few people and a couple of groups so please feel free to forward." (sic) Turner also supplied email addresses of city officials to ensure threats and harassment from thousands.

According to the Star Telegram "Mimi was to be euthanized if Woods did not comply with the dangerous-dog ordinance, which requires that it be spayed, kept in an enclosed area or on a leash and muzzled whenever outside. Woods must also carry \$100,000 in liability insurance." Woods who lives on \$780 in disability said he could not afford to comply.

Search

**Donate**

- Help support
- grassroots
- independent
- media.

Turner sent out another internet plea for donations to cover the costs, "My client is a young Iraq war veteran who was permanently disabled by a roadside bomb. (He walks with a cane, has little control of his bowels, is incontinent, wears a catheter, and suffers from PTSD). His psychiatrist recommended that he get a dog as therapy, which he did." \$17,000 was donated for Woods.

Donate

\$217.00 donated

Had Randy Turner not sent out a plea for donations, Woods would not have had the money to comply. Mimi would have been euthanized and unable to attack the pregnant couple and their baby last week.

**IMC Network**

Of course it was later learned that Woods never served in Iraq, was not wounded in the war, is not disabled and Mimi is not a therapy dog. Woods impersonated a soldier which is actually a crime. He even had the nerve to show up in court dressed in a uniform. A few days after Turner found out that his client was a total fraud he quietly resigned as his lawyer. Unbeknown to most he was still personally aiding and abetting Woods and Mimi.

What is even more ironic about this case is the fact that Turner spoke for a strengthening of the Fort Worth, Texas dangerous dog code Council item G-16653 on 08/11/09. Even his lawyer wife Patti Gearhart Turner was for the motion which passed. Yet, while he was defending Woods in court Turner said his client shouldn't have to comply with those new regulations. If Woods had complied with the regulations, his dog would not have been able to attack the couple and their baby.

Woods' dogs are not the only ones with a criminal rap sheet. Woods also personally assaulted two people last year. He was charged with "assault bodily injury" cases 1235660 and 123566. He is currently out on a \$7,000 bond. His trial begins 08/10/11. According to a police report, "Woods became 'belligerent' when a neighbor confronted him about his dogs chasing a group of children and the neighbor feared 'he would have ... to shoot the dogs.'"

If the name "Turner" sounds familiar to locals it's because he ran for Judge of the 17th District and lost by a landslide 11/04/2008. He also ran for Judge of the 342nd District and again lost by a landslide 11/02/10. Generally private practice lawyers who run for judge are not cutting it in private practice. They just want to sit on the bench to collect the consistent salary of a Judge.

Turner's wife Patti Gearhart Turner is also a lawyer. She graduated magna cum laude from law school. This is ironic. She's on the board of trustees of the "Texas Center for Legal Ethics - Professionalism in Practice." Their goal is "to promote the practice of law by Texas lawyers in an ethical and professional manner." She is currently chief of staff for Texas Wesleyan University President Frederick G. Slabach.

Woods' trial is set for this coming Thursday at 2:30 p.m. said Brandon Bennett the City's code compliance Director. Woods may also face charges, Bennett said. "At the very least, Woods is facing multiple criminal charges, and it is still a question whether any of those will be a felony," Bennett said. "That will be determined next week." Stay tuned for an update after the hearing.

More articles about Steven Woods, "dangerous dog" Mimi and Randy Turner.

<http://www.star-telegram.com/2011/07/29/3257177/seized-pit-bull-could-face-euthanasia.html>

<http://www.the33tv.com/news/kdaf-steven-woods-vet-dog-mimi-18-thousand-story,0,2727656.story>

<http://blog.dogsbite.org/2010/12/fort-worth-pit-bull-owner-steven-woods.html>

<http://www.star-telegram.com/2010/12/28/2731697/fort-worth-says-it-will-keep-pursuing.html>

<http://www.star-telegram.com/2010/12/28/2731698/web-story-about-fort-worth-therapy.html>

[http://www.star-telegram.com/2010/11/22/2652406\\_web-campaign-is-success-for-disabled.html](http://www.star-telegram.com/2010/11/22/2652406_web-campaign-is-success-for-disabled.html)

<http://www.indybay.org/newsitems/2011/05/28/18680622.php>

<http://www.star-telegram.com/2011/07/29/32...>

[Add Your Comments](#)

**Knew it was just a matter of time**

by Charlie

Monday Aug 1st, 2011 7:44 PM

5

Knew it was just a matter of when/where Wood's dogs would attack again. They attacked three times which police recorded. How many times did they attack when police didn't record? This lawyer was helping a criminal. There's no way he didn't know he was fake. Turner had 11 witnesses lie on the stand, perjury for his client. Defendant said his dog wasn't even in the City at the time of attack. Really? Why didn't this



5

**Regions**

- north coast
- central valley
- north bay
- east bay
- south bay
- san francisco
- peninsula
- santa cruz
- california
- us
- international

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**California | U.S. | Animal Liberation | Indymedia**

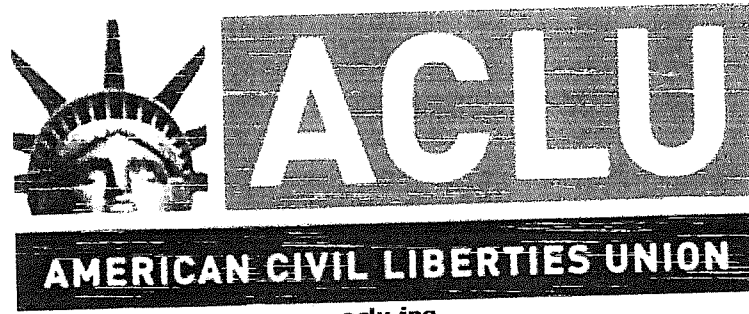
**ACLU tells lawyer Randy Turner that Indybay will not remove article about animal cruelty**

by Freedom of Speech  
Saturday May 28th, 2011 11:11 AM

An article with photos and videos was posted on Indybay about animal cruelty. The article was about Amanda Lollar of Bat World Sanctuary. She is seen in the video operating on a conscious bat with no anesthesia. She cuts the bat's vagina too much while trying to do an episiotomy and the bat's vagina and uterus are pulled out. Mom and pup died. Lollar is not a veterinarian.

**Topics**

- animal lib
- anti-war
- arts + action
- drug war
- education
- en español
- environment
- global justice
- government
- health/housing
- immigrant
- media
- labor
- lgbt / queer
- police state
- racial justice
- womyn



Mary Cummins a wildlife rehabilitator with Animal Advocates filmed the episiotomy gone awry while attending a supposed training internship at Bat World Sanctuary in Mineral Wells, Texas. Cummins thought she would be videotaping the normal birth of a baby bat. While Cummins was at Bat World Sanctuary she witnessed other acts of animal cruelty and neglect besides violations of the health code. She left the internship early, returned home to Los Angeles, California and reported the animal cruelty to authorities.

After Cummins reported Lollar for animal cruelty she was sued for defamation and sharing supposed "copyrighted/proprietary data." Lollar stated in court that the way in which she did the botched episiotomy is "proprietary." Randy Turner of Turner & McKenzie is the Fort Worth, Texas lawyer representing Amanda Lollar and Bat World Sanctuary. Cummins is currently pro se but is looking for pro-bono representation.

Turner filed a motion for temporary injunction against Cummins to force her to remove the videos, photos and articles posted online. Substitute Judge William Brigham sitting in for Judge Bonnie Sudderth allowed the temporary injunction. Turner presented the judge with a temporary order he'd pre-written which included a list of url links on the internet. Most of these linked articles, photos and videos were not posted by Cummins. They were posted by others or robots on websites she does not control.

Cummins removed all content which she controlled. She could not remove websites created by others. Turner then filed a motion for contempt against Cummins because she did not remove other peoples' websites. Turner then sent the temporary order to the websites directly demanding that they remove the items. Some of the websites such as Facebook did remove the content but Indybay did not.

**International**

- americas
- haiti
- iraq
- palestine
- afghanistan

**More**

- make media
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- calendar
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- archives
- chat
- links

Search

**Donate**

Help support

Turner then threatened to sue Indybay if they did not remove the content. ACLU of Northern California sent a response letter to Turner stating that Indybay will not remove the content. From the letter,

"Under § 230 of the Communications Decency Act, operators of websites such as Indybay cannot be forced to censor articles and other information that, like the materials here at issue, originate with a third party, even if those materials are defamatory or otherwise objectionable.

Moreover, Indybay has a First Amendment right to display factually accurate materials, including videos and photographs, even if they were acquired unlawfully by a third party. Your demand that Indybay remove the entire webpage, which includes not just the initial post but also links to material supporting and disputing the accuracy of that post as well as information relating to your clients' lawsuit against Ms. Cummins, is clearly overbroad; complying with it would result in the censorship of materials that are clearly protected by the First Amendment, including materials that support Ms. Lollar and Bat World Sanctuary.

In short, whatever the merits of your clients' dispute with Ms. Cummins, Indybay may properly maintain its webpage under § 230 of the First Amendment." (Link to letter from ACLU [http://www.aclunc.org/issues/freedom\\_of\\_press\\_and\\_speech/asset\\_upload\\_file985\\_9987.pdf](http://www.aclunc.org/issues/freedom_of_press_and_speech/asset_upload_file985_9987.pdf) )

About ACLU of Northern California: The ACLU of Northern California works to preserve and guarantee the protections of the Constitution's Bill of Rights. The largest of the ACLU's 53 affiliates nationwide, the ACLU-NC is located in San Francisco. Today, the ACLU-NC has over 55,000 members, 50 staff, and 16 volunteer-run chapters across the region.

<http://www.aclunc.org>

About Indybay: The San Francisco Bay Area Independent Media Center is a non-commercial, democratic collective of bay area independent media makers and media outlets, and serves as the local organizing unit of the global Indymedia network.

<http://www.indybay.org>

About Mary Cummins: Cummins is President of Animal Advocates, a Los Angeles based non-profit animal rescue group. She is also a permitted wildlife rehabilitator specializing in small mammals including bats.

<http://www.AnimalAdvocates.us>

**Letter from ACLU of Northern California on behalf of Indybay**  
by Archive Saturday May 28th, 2011 9:49 PM

5



6

United States  
Department of  
Agriculture

May 17, 2011

Marketing and  
Regulatory  
Programs

Mary Cummins  
645 W. 9<sup>th</sup> Street, #110-140  
Los Angeles, CA 90015

Animal and  
Plant Health  
Inspection  
Service

Dear Ms. Cummins:

Legislative and  
Public Affairs

This acknowledges your Freedom of Information Act (FOIA) request (copy enclosed) received in this office on May 16, 2011. Your request has been assigned case number FOIA 11-493 and our response is due to you on June 14, 2011.

Freedom of  
Information

4700 River Road  
Unit 50  
Riverdale, MD  
20737-1232

Should you have any concerns about your request, please feel free to contact this office at (301) 734-8296. When making an inquiry, be sure to refer to the assigned case number.

Sincerely,

for: Tonya Woods, Director  
Freedom of Information and Privacy Act Staff  
Legislative and Public Affairs

Enclosure



177 - 493

EMPIE  
IES  
Individual



Mary Cummins  
<mmmaryinla@aol.com>  
05/15/2011 12:52 PM

To: Katie.M.Green@aphis.usda.gov,  
foia.officer@aphis.usda.gov  
cc  
bcc  
Subject: FOIA request - Complaint against Bat World Sanctuary,  
Amanda Lollar

Mary Cummins  
645 W. 9th St. #110-140  
Los Angeles, CA 90015  
(310) 877-4770

May 15, 2011

USDA, APHIS, Animal Care

**FOIA REQUEST**

Dear FOIA Officer:

Pursuant to the federal Freedom of Information Act, 5 U.S.C. § 552, I request access to and copies of All information about the investigation into Amanda Lollar and Bat World Sanctuary, USDA concern number W11-108, Legal Name (DBA): BAT WORLD SANCTUARY, Customer No: 4916 Certificate No: 74-C-0287. I would like all communications concerning this investigation to/from the USDA. I would also like the results of the investigation including any communications sent to/from Bat World Sanctuary.

I would like to receive the information in electronic format. (Via email.)

I agree to pay reasonable duplication fees for the processing of this request.

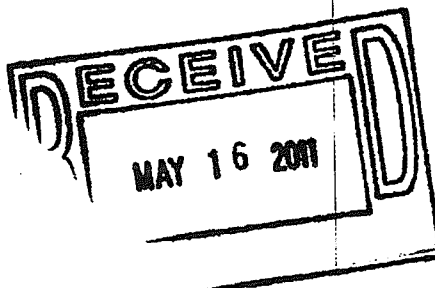
If my request is denied in whole or part, I ask that you justify all deletions by reference to specific exemptions of the act. I will also expect you to release all segregable portions of otherwise exempt material. I, of course, reserve the right to appeal your decision to withhold any information or to deny a waiver of fees.

I look forward to your reply within 20 business days, as the statute requires.

Thank you for your assistance.

Sincerely,

Mary Cummins



JUN 13 2011

-----Original Message-----

From: Katie.M.Green@aphis.usda.gov  
To: mmmaryinla@aol.com

JUN 14 2011

Sent: Thu, Apr 28, 2011 9:50 am  
Subject: Fw: Complaint against Bat World Sanctuary, Amanda Lollar

April 28, 2011

Mary Cummins  
[mmmaryinla@aol.com](mailto:mmmaryinla@aol.com)

Dear Complainant:

Thank you for your emailed letter dated April 27, 2011 concerning Bat World Sanctuary. Your concern has been issued number W11-108. If you wish to know the results of our findings, you must send a request, in writing, to our Freedom of Information Act office. Depending on the circumstances of the situation, please allow us enough time (30 to 60 days) to thoroughly investigate your concerns.

FOIA requests can be submitted three ways--

1. Email: [foia.officer@aphis.usda.gov](mailto:foia.officer@aphis.usda.gov)
2. Fax: 301-734-5941
3. US Mail: USDA, APHIS, FOIA  
4700 River Road, Unit 50  
Riverdale, MD 20723

Animal Care is the division of the U.S. Department of Agriculture (USDA) that is responsible for the enforcement of the Animal Welfare Act. The Act provides minimum standards for the humane care and use of animals at USDA licensed or registered facilities.

Animal Care inspectors conduct routine unannounced inspections at all USDA licensed and registered facilities to ensure that they are meeting or exceeding these minimum standards. Our inspectors also conduct searches for unlicensed facilities conducting regulated activities. We perform inspections and searches when necessary in response to valid concerns and complaints received from the public to ensure the well-being of the animals and compliance with the law. If violations are found, enforcement action appropriate for the circumstances will be initiated.

Please be assured that we will look into your concerns and take appropriate action if necessary.

Thank you for your interest in the welfare of these animals.

Sincerely,

Robert Gibbens, DVM  
Director, Western Region  
USDA, APHIS, Animal Care

Mary Cummins <[mmmaryinla@aol.com](mailto:mmmaryinla@aol.com)>  
04/27/2011 02:30 PM

To [acwest@aphis.usda.gov](mailto:acwest@aphis.usda.gov), [ace@aphis.usda.gov](mailto:ace@aphis.usda.gov)  
cc  
Subject: Complaint against Bat World Sanctuary, Amanda Lollar

Amanda Lollar of Bat World Sanctuary [www.batworld.org](http://www.batworld.org) has a usda permit. I would like to report her for animal cruelty. I'm sure this is a violation of her permit. She is not giving the animals proper veterinary care. See below video.

Below is a video of Amanda Lollar of Bat World Sanctuary performing surgery on a bat, an episiotomy. She is not a veterinarian. She gave it no local anesthesia. She actually did a double diagonal episiotomy. You never do diagonal episiotomies because they cause much more damage. After doing a double episiotomy the baby starts to emerge. Lollar mistakes its head for a foot. She even says she hopes she didn't cut the baby when she was cutting mom. After the baby emerges Lollar pulls the umbilical cord. The bat's vagina and uterus prolapse. You can hear Lollar saying this. She admits to cutting too much. She accidentally cut into muscle, not just skin. Plus, you never pull the umbilicus out or cut it as it causes massive blood loss and death. The baby bat must stay attached to mom for 24 hours by the cord. It then dries up and falls off. Fortunately the mom bat passed out unconscious at this point, see photo in the video. Lollar pushed her vagina back inside her then proceeded to glue the incisions. Her eyes aren't that good. She glued her vagina shut. The mom survived for an hour after the surgery. I went to check for her again and she was gone. I assume she died and Lollar tossed her into the trash with all the other dead bats. Someone erased one bat from the bat count on the wall. The baby was born dead but it was still slightly pink, see photo. It had just recently died, most likely from what Lollar was doing. Plus, Lollar had given the mom a rabies vaccination two days earlier. You never give vaccinations while pregnant. Plus, it's illegal for a non-vet to give rabies vaccinations.

[http://www.youtube.com/watch?v=ckVTYVJHH\\_A](http://www.youtube.com/watch?v=ckVTYVJHH_A)

Lollar just posted her new book. Another intern was taking photos while I was videotaping. She uses this case as an example of the "perfect episiotomy." She totally lied about the mom and baby dying, using anesthesia, not cutting too much, prolapsing her uterus/vagina, closing the wounds.... I can send you her book as evidence if you like. You can see it's the same bat in the video.

I spoke with the veterinary board. They said this is animal cruelty and neglect. What should I do? This is just one tiny example of the abuse I witnessed while at Bat World. I have many more videos and photos. This woman should not be rehabbing bats. She shouldn't have any bats.

Here is her USDA permit number

|                     |                         |
|---------------------|-------------------------|
| Legal Name          | <b>BAT WORLD</b>        |
| (DBA):              | <b>SANCTUARY</b>        |
| Customer No:        | <b>4916</b>             |
| Certificate No:     | <b><u>74-C-0287</u></b> |
| Certificate Status: | <b>ACTIVE</b>           |
| Status Date:        | <b>Mar 2, 1994</b>      |



7

**From:** Karen Pianka  
**Sent:** Tuesday, May 03, 2011 9:40 AM  
**To:** Mitch Lockwood; Megan Russell  
**Subject:** RE: Bat World Sanctuary

How does this look?

\* \* \* \* \*  
\* \* \* \* \*  
\* \* \* \* \*

Thank you for taking the time to contact the Texas Parks and Wildlife Department (TPWD) to express your concerns about a currently permitted wildlife rehabilitator. As you may already be aware, permitted wildlife rehabilitators are required to abide by the regulations concerning wildlife rehabilitation in Texas. These regulations are located at <http://www.tpwd.state.tx.us/huntwild/wild/rehab/regs/>. When a concern relating to a permittee is brought forward, it is agency policy to request that a game warden visit the facility. The warden will make a determination whether the complaints or concerns can be substantiated and whether violations of the wildlife rehabilitation regulations are occurring. Depending upon the warden's findings, it is possible that further action may be taken, up to and including revocation of the wildlife permit. In some cases a complaint is raised for which another agency has jurisdiction, such as the Texas Department of Health.

Please note that we are receiving a large volume of emails related to this issue at this time, and unfortunately have only limited staff who can answer them. We appreciate your patience as the concerns raised are being investigated.

Thank you,  
Wildlife Permits

\* \* \* \* \*  
\* \* \* \* \*  
\* \* \* \* \*

Thanks,  
Karen

**From:** Mitch Lockwood  
**Sent:** Tuesday, May 03, 2011 8:39 AM

**To:** Karen Pianka  
**Subject:** RE: Bat World Sanctuary

Sounds like a good approach. Hopefully that email won't consume more than a few minutes of your time.

Thanks,

Mitch

**From:** Karen Pianka  
**Sent:** Tuesday, May 03, 2011 8:18 AM  
**To:** Mitch Lockwood  
**Subject:** RE: Bat World Sanctuary

Sounds good. I thought we might need to craft a standard email which includes something about the large number of inquiries we are receiving and our limited staff who can answer them.  
Thank you,

Karen Pianka  
Wildlife Permits Coordinator  
Texas Parks & Wildlife  
4200 Smith School Road  
Austin, Texas 78744  
(512) 389-4491

**From:** Mitch Lockwood  
**Sent:** Monday, May 02, 2011 9:48 PM  
**To:** Karen Pianka  
**Subject:** RE: Bat World Sanctuary

Please don't spend any time responding before we can discuss. I guess I need a good summary, in person. Our time in east Texas was cut short and we're heading back tomorrow. I'll put a reminder in my calendar to come talk to you about this.

Thanks,

Mitch

**From:** Karen Pianka  
**Sent:** Monday, May 02, 2011 4:03 PM  
**To:** Mitch Lockwood  
**Subject:** re: Bat World Sanctuary  
**Importance:** High

Mitch,

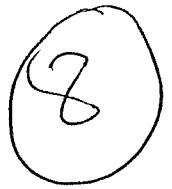
As it turns out, we now have many desperate folks emailing the WPO email box about this situation. Do you think that Megan or I should try to respond to each of these desperate emails? Although many videos are apparently posted, as Scott notes below, they may not be admissible as evidence, not to mention the fact that Megan and I may not enjoy watching what are apparently very graphic presentations.

Please let me know what you think, and thanks for your help,

Karen Pianka  
Wildlife Permits Coordinator  
Texas Parks & Wildlife  
4200 Smith School Road  
Austin, Texas 78744  
(512) 389-4491

Amanda Lollar  
Founder and President  
Bat World Sanctuary, Inc.

[www.batworld.org](http://www.batworld.org)



A non-profit, all volunteer conservation  
organization providing rescue for bats worldwide.  
Please join us on [Facebook](#) and [Twitter!](#)

PLEASE GO GREEN, print only if necessary

---

**From:** Donna Robbins <codeenforcement@mineralwellstx.gov>  
**To:** Bat World Sanctuary <sanctuary@batworld.org>  
**Sent:** Wed, March 23, 2011 4:14:02 PM  
**Subject:** Fwd: P&P 11-182 Due: COB 3/31/11 CCEA HEART: New Assignment: A03212011.0140004

## Forwarded conversation

Subject: **Fwd: P&P 11-182 Due: COB 3/31/11 CCEA HEART: New Assignment: A03212011.0140004**

-----

From: **Mary Cummins** <[mmmaryinla@aol.com](mailto:mmmaryinla@aol.com)>  
Date: Mon, Mar 21, 2011 at 4:18 PM  
To: [policechief@mineralwellstx.gov](mailto:policechief@mineralwellstx.gov), [patrollt@mineralwellstx.gov](mailto:patrollt@mineralwellstx.gov), [courtclerk@mineralwellstx.gov](mailto:courtclerk@mineralwellstx.gov),  
[adminlt@mineralwellstx.gov](mailto:adminlt@mineralwellstx.gov), [financedir@mineralwellstx.gov](mailto:financedir@mineralwellstx.gov), [firemarshal@mineralwellstx.gov](mailto:firemarshal@mineralwellstx.gov),  
[firechief@mineralwellstx.gov](mailto:firechief@mineralwellstx.gov), [citymanager@mineralwellstx.gov](mailto:citymanager@mineralwellstx.gov), [buildingofficial@mineralwellstx.gov](mailto:buildingofficial@mineralwellstx.gov),  
[codeenforcement@mineralwellstx.gov](mailto:codeenforcement@mineralwellstx.gov), [healthinspector@mineralwellstx.gov](mailto:healthinspector@mineralwellstx.gov), [inspector@mineralwellstx.gov](mailto:inspector@mineralwellstx.gov)

I just received this from the State Health Department in response to my complaint about rabies and rabies vaccinations at Bat World Sanctuary. They told me to forward this to local law enforcement which is why I'm emailing it to you. Thanks.

Mary Cummins

-----Original Message-----

From: Wilson, Pam <[Pam.Wilson@dshs.state.tx.us](mailto:Pam.Wilson@dshs.state.tx.us)>  
To: [mmmaryinla@aol.com](mailto:mmmaryinla@aol.com)  
Sent: Mon, Mar 21, 2011 2:00 pm  
Subject: FW: P&P 11-182 Due: COB 3/31/11 CCEA HEART: New Assignment: A03212011.0140004

Hello, Ms. Cummins – thank you for your inquiries. You are correct that Texas Health and Safety Code, Sec. 826.023, only allows for rabies vaccine for animals to be administered by or under the direct supervision of a veterinarian, except for the livestock exemption in 826.023 (e). Additionally, this law limits the sale and distribution of rabies vaccine for animals to a veterinarian or a person working at a veterinary clinic and accepting the vaccine on the veterinarian's behalf. A violation of this section is a Class C misdemeanor, which would be enforced by local law enforcement. Therefore, you may wish to contact your local (city or county) law enforcement about the scenarios you have witnessed.

If any person knows of an individual's possible exposure to rabies, they are required by law to report the incident to the local rabies control authority for that area. Reporting is required under Texas

Health and Safety Code, Sec. 826.041, and Texas Administrative Code, Sec. 169.25. Although a specific violation is not cited in statute, enforcement would, again, fall under the purview of local law enforcement. Texas Health and Safety Code, Sec. 826.042 and Texas Administrative Code, 169.25 and 169.27 require that a person with a suspected rabid animal submit it for rabies testing (quarantine is not allowed for high-risk animals such as bats); a violation to do so is a Class C misdemeanor per 826.044 and would be enforced by local law enforcement.

Although from a personal safety stance, handling bats with bare hands is definitely not recommended, there are no laws of which we are aware that require the wearing of gloves.

If we can be of additional assistance, please let us know.

Pam Wilson, RVT, MEd, CHES  
Zoonosis Control Branch, MC 1956  
P.O. Box 149347  
Austin, Texas 78714-9347

Telephone: 512/458-7111 ext. 6622  
Fax: 512/458-7454

-----  
From: **Donna Robbins** <[codeenforcement@mineralwellstx.gov](mailto:codeenforcement@mineralwellstx.gov)>  
Date: Mon, Mar 21, 2011 at 4:55 PM  
To: Robert Turk <[buildingofficial@mineralwellstx.gov](mailto:buildingofficial@mineralwellstx.gov)>

Robert,

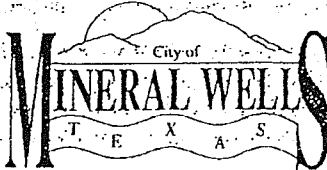
Should I forward to Mike???

Thanks~!

--  
**Donna Robbins,**  
**Code Enforcement Officer**  
**City of Mineral Wells**  
**Office: 940-328-7718**  
**Fax: 940-328-7734**  
**Email: [codeenforcement@mineralwellstx.gov](mailto:codeenforcement@mineralwellstx.gov)**  
**Web: [cityofmineralwellstx.gov](http://cityofmineralwellstx.gov)**

--  
**Donna Robbins,**  
**Code Enforcement Officer**  
**City of Mineral Wells**  
**Office: 940-328-7718**  
**Fax: 940-328-7734**

9



Post Office Box 339  
Mineral Wells, Texas, 76067  
(817) 328-1211

TEMPORARY  
CERTIFICATE OF OCCUPANCY

City of Mineral Wells, Texas

Department of Building Inspection

This Certificate issued pursuant to the requirements of Section 307 of the Uniform Building Code certifying that at the time of issuance this structure was in compliance with the various ordinances of the City regulating building construction or use. For the following:

Use Classification Commercial Bldg. Permit No. n/a

Type Construction Brick

Owner of Building Amanda Lollar Address 217 North Oak

Building Address 115 N.E. 1st Avenue

Gerald Hunter  
Building Official

By: *Gerald Hunter*

Jerry VanNatta  
Fire Chief/Marshall

Date: 2/3/95

TEMPORARY CERTIFICATE OF OCCUPANCY TO EXPIRE ON  
4/4/95

Between  
9 & 3 TOMMOR  
2-2-95

ACCT # \_\_\_\_\_

CITY OF MINERAL WELLS  
MINERAL WELLS, TEXAS

CERTIFICATE OF OCCUPANCY  
APPLICATION

ADDRESS OR LOCATION 115 N.E. 1<sup>st</sup> AVE

TYPE OF BUSINESS RETAIL

ZONING CLASSIFICATION \_\_\_\_\_

OWNER OF BUILDING Amanda Collier PHONE # 325-3404

ADDRESS OF OWNER 217 N. OAK

OCCUPANT OF BUILDING Julie Ruiz PHONE # Home - 325-4564

ADDRESS OF OCCUPANT 907 N.W. 7<sup>th</sup> AVE

SIGNATURE Amanda Collier DATE Feb 1, 1995

RECEIVED BY Ednie Nelson FEE \$30.00

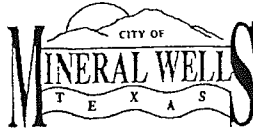
DO NOT WRITE BELOW THIS LINE

TYPE OF BUILDING \_\_\_\_\_ NO OF STORIES \_\_\_\_\_

FIRE MARSHALL \_\_\_\_\_ BUILDING OFFICIAL \_\_\_\_\_

DATE \_\_\_\_\_ DATE \_\_\_\_\_

REMARKS:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



# CERTIFICATE OF OCCUPANCY INSPECTION REPORT

Date  
Of Inspection 2/2/95

Legal Sub Lynch Bk 1 Lot/s 5/7 OF E 80' OF 12  
 Address or Location 115 N.E. 1ST AVE  
 Type of Business Resale Shop Zoning Com  
 Owner's Name Amanda Collier Phone # 325-3404  
 Owner's Address 217 N. OAK  
 Occupant's Name Julie Ruiz Phone # \_\_\_\_\_  
 Occupant's Address 907 N.W. 7th AVE Phone # 325-4364  
 Type of Building Rock & Wood Stories ONE

CO - INSPECTIONS

FOUNDATION OK

STRUCTURE OK

DOORS OK

WINDOWS OK

ROOFING Leaking needs to be repaired

MECHANICAL OK

\* ELECTRICAL SEE REMARKS

PLUMBING Water heater Not vented properly  
GAS NOT CONNECTED,

OTHER Water Service is Required For  
Sanitation

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

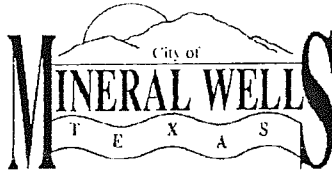
INSPECTED BY: [Signature]

REMARKS

\* Electrical Service will have  
to be brought up to code,  
Motor Base, Riser, Ground Rod Etc.

<sup>NECESSARY</sup>  
An Electrician Licensed By the  
City of Mineral Wells will have  
to do the work.





Inspection Department

Post Office Box 339  
Mineral Wells, Texas 76067  
(817) 328-1211

CERTIFICATE OF OCCUPANCY

CITY OF MINERAL WELLS, TEXAS

DEPARTMENT OF BUILDING INSPECTION

This Certificate issued pursuant to the requirements of Section 307 of the Uniform Building Code certifying that at the time of issuance this structure was in compliance with the various ordinances of the City regulating building construction or use for the following:

Use Classification Commercial Bldg. Permit No. n/a

Type of Construction Brick

Owner of Building Amanda Lollar Address 217 North Oak

Building Address 115 N.E. 1st Avenue

Gerald Hunter  
Building Official

By: [Signature]

Art Verona  
Fire Chief/Marshall

By: [Signature]

Steve Perez  
Health Inspector

By: n/a

Maria Cortes-Adcock  
Ind. Pretreatment Coordinator

By: n/a

DATE: 9/6/96

Please call first.

ACCT # \_\_\_\_\_

CITY OF MINERAL WELLS  
MINERAL WELLS, TEXAS

CERTIFICATE OF OCCUPANCY  
APPLICATION

ADDRESS OR LOCATION 115 NE 1<sup>st</sup> Ave.

TYPE OF BUSINESS KARATE studio

ZONING CLASSIFICATION COMMERCIAL

OWNER OF BUILDING Amanda Lollar PHONE # 325-3404

ADDRESS OF OWNER 217 N. OAK

OCCUPANT OF BUILDING William Campbell PHONE # 328-0442

ADDRESS OF OCCUPANT \_\_\_\_\_

SIGNATURE Amanda Lollar DATE Sept 2 96

RECEIVED BY Blaine Nelson FEE \$30.00

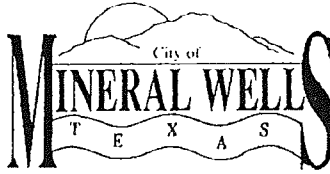
DO NOT WRITE BELOW THIS LINE

TYPE OF BUILDING BRICK NO OF STORIES TWO

FIRE MARSHALL \_\_\_\_\_ BUILDING OFFICIAL MLL

DATE \_\_\_\_\_ DATE 9/4/96

REMARKS: OK to C.O.



Inspection Department

Post Office Box 339  
Mineral Wells, Texas 76067  
(817) 328-1211

CERTIFICATE OF OCCUPANCY  
CITY OF MINERAL WELLS, TEXAS  
DEPARTMENT OF BUILDING INSPECTION

This Certificate issued pursuant to the requirements of Section 307 of the Uniform Building Code certifying that at the time of issuance this structure was in compliance with the various ordinances of the City regulating building construction or use for the following:

Use Classification Commercial Bldg. Permit No. n/a

Type of Construction Masonry/wood

Owner of Building Amanda Lollar Address 217 North Oak

Building Address 115 N.E. 1st Avenue

Gerald Hunter  
Building Official

By: [Signature]

Art Verona  
Fire Chief/Marshall

By: [Signature]

Steve Perez  
Health Inspector

By: n/a

Maria Cortes-Adcock  
Ind. Pretreatment Coordinator

By: n/a

DATE: 4/17/97

2:00 p.m. on  
Thursday  
4/17/97 per  
J.M.W.

ACCT # \_\_\_\_\_

CITY OF MINERAL WELLS  
MINERAL WELLS, TEXAS

CERTIFICATE OF OCCUPANCY

ADDRESS OR LOCATION 115 N.E. 1<sup>st</sup> Ave.

TYPE OF BUSINESS STORAGE Com

ZONING CLASSIFICATION COMMERCIAL

OWNER OF BUILDING ANDREA COLLAR PHONE # 817-325-3404

ADDRESS OF OWNER 217 N. OAK AVE. M.W.

OCCUPANT OF BUILDING LARA BEQUET PHONE # 817-325-1777

ADDRESS OF OCCUPANT 608 NW 10<sup>th</sup> Street 1-817-450-4009 p.m.

SIGNATURE [Signature] DATE 3-10-97

RECEIVED BY [Signature] FEE \$30.00

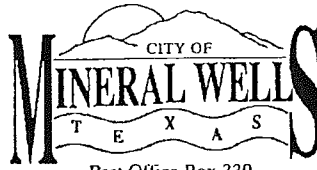
DO NOT WRITE BELOW THIS LINE

TYPE OF BUILDING Masonry/wood NO OF STORIES Two

FIRE MARSHALL \_\_\_\_\_ BUILDING OFFICIAL [Signature]

DATE \_\_\_\_\_ DATE 4/17/97

REMARKS: ok to C.O.



Post Office Box 339  
Mineral Wells, Texas 76068  
817-328-1211 • FAX 817-328-1478

*OK FOR NOW Gerald  
No Signs OF WATER ON  
the ground 5/9/95*

April 7, 1995

CERTIFIED MAIL Z 203 949 915

Amanda Lollar  
217 North Oak  
Mineral Wells, TX 76067

Re: Complaint

Dear Sir:

The City of Mineral Wells has adopted codes and ordinances to protect the public health, safety, and welfare of all its citizens. It has been brought to the attention of the City that waste water is being discharged to the ground surface at the following location, 2<sup>nd</sup> North Oak, Lots N 37.5X100' of D of 15, Block 9, Lynch Addition. The City of Mineral Wells has adopted the 1994 Edition of the Uniform Plumbing Code, which requires all liquid waste to be disposed of through the public sewer system.

Please be advised that you are currently in violation of Sections 303.0, 304.0 and 305.0 of the 1994 Uniform Plumbing Code, which requires that all liquid wastes be discharged through and by means of an approved plumbing and drainage system and that such system shall be connected to the public sewer system.

Upon receipt of this letter, you have ten (10) days to resolve this situation. Please discontinue discharging waste water to the ground surface by repairing or altering your plumbing system so that all waste water is discharged into the City's sanitary sewer system.

If you have questions or if I may be of assistance, please do not hesitate to contact me at your convenience.

Sincerely,

A handwritten signature in cursive script that reads "Gerald Hunter".

Gerald Hunter  
Building Official

INSPECTION REPORT

Date: 4/6/95

Location: 217 North OAK

Owner: AMANDA L. Lollar

Address of owner: 217 N. OAK Avenue M. Wells Tx. 76067

Addition: Lynch Block 9 Lot: N 37.5x100' OF 15

Condition: Waste Water being deposited to the ground surface at the back of the building. Required to be plumbed into the sanitary sewer

Dwight K. Hunt  
Inspector's Signature

Diagram:

Application will not be accepted until COMPLETELY filled out. Please print legibly.

Date Submitted 10/30/07  
\$30 fee received OK 899A  
Receipt # 25009  
Received by X Olson

**City of Mineral Wells  
Application for Certificate of Occupancy**

Application for Certificate of Occupancy is made to the Building Official of the City of Mineral Wells, TX for authorizing the use of vacant land or building at:

Address of Use: 115 N.E. 1<sup>st</sup> Ave  
Name of Business: Potential Office Space  
Building to be used as (please be specific): Office Space (115 etc)  
Square Footage of Building: Approx 2800 sqft  
Occupant Name: Armando Lullize Phone #: 940-325-3464  
Occupant Mailing Address: 217 N Oak Ave  
Property Owner Name: Armando Lullize Phone #: 940 325 3464  
Owner Mailing Address: 217 N Oak Ave Mineral Wells TX 76067  
Contact Person's Name: Armando Lullize Phone #: 940-325-3464

Call for Appt.

**REVOCAATION:** The Building Official may, in writing, suspend or revoke a Certificate of Occupancy issued under the provisions of this ordinance whenever the Certificate of Occupancy is issued in error, or on the basis of incorrect information supplied, or when it is determined that the building or structure or portion thereof is in violation of any ordinance or regulation or any of the provisions of this ordinance or the most current Uniform Building, National Electrical, Uniform Mechanical, Uniform Fire, and/or Uniform Plumbing Codes, and/or State/Local Health Laws. I hereby certify that I have read the above information and know the same to be true and correct.

Printed Name: Armando Lullize Signature: Armando Lullize Date: 10/30/07

| OFFICIAL USE ONLY  |                                     |
|--|-------------------------------------|
| Land Use Classification (from Permitted Land Use Table)<br><u>Professional Office</u>  |                                     |
| Zoning District <u> CBD </u>   | Is this permitted use? <u> Yes </u> |
| Occupancy Group <u> B </u>   | Occupancy Load <u> 28 </u>          |
| Square Footage of Building <u> 2800 </u>   | # of Stories <u> 2 </u>             |
| Inspected by (print) _____   | Signature _____                     |
| Date: <u> 11-2-7 </u> Certificate of Occupancy approved <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO Temporary <u> 60 day Temp </u>   |                                     |
| Inspectors who need to inspect this business: <input checked="" type="checkbox"/> Building Official <input checked="" type="checkbox"/> Fire Chief<br><input type="checkbox"/> Health Inspector <input type="checkbox"/> Pre-Treatment |                                     |
| Faxed to: TXU _____ Water _____ Other _____  |                                     |

## MINERAL WELLS FIRE/EMS CERTIFICATE OF OCCUPANCY INSPECTION REPORT

BUSINESS NAME POTENTIAL OFFICE SPACE PHONE 940-325-3404

BUSINESS ADDRESS 115 N.E. 1st Ave

| YES   | NO | N/A | IFC/UBC BLDG CLASS  | B | 2,800 sq ft | OCCUPANCY | 28 |
|---|----|-----|---|---|-------------|-----------|----|
|   | X  |     | 1. Address is visible and legible from the street or road fronting the property with minimum 6" numbers/letters   |   |             |           |    |
|   | X  |     | 2. Exit doors open freely and have panic hardware or signage on the door stating "This door must remain unlocked while building is occupied". Number of exits |   |             |           |    |
|   | X  |     | 3. Exit doors have lighted/luminous exit signs  |   |             |           |    |
|   | X  |     | 4. Emergency lighting in place and operating properly   |   |             |           |    |
|   | X  |     | 5. Working smoke detector in each r   |   |             |           |    |
|   | X  |     | 6. Breakers in panel are labeled clear  |   |             |           |    |
|   | X  |     | 7. No extension cords or multi-plug a   |   |             |           |    |
|   | X  |     | 8. Sufficient fire extinguishers with o   |   |             |           |    |
| X   |    |     | 9. Exits, hallways, and corridors use   |   |             |           |    |
| X   |    |     | 10. Mechanical, electrical, sprinkler r   |   |             |           |    |
|   |    | X   | 11. Flammable/combustible liquids/fo  |   |             |           |    |
|   | X  |     | 12. Electrical wiring and equipment a   |   |             |           |    |
| X   |    |     | 13. Storage areas are clean and order   |   |             |           |    |
|   |    | X   | 14. Fire alarm system, if installed, is   |   |             |           |    |
|   |    | X   | 15. Vent-a-Hood extinguisher system   |   |             |           |    |
|   |    | X   | 16. If Vent-a-Hood system is install  |   |             |           |    |
|   |    | X   | 17. Sprinkler system, if installed, has   |   |             |           |    |
|   |    | X   | 18. Knox box is required and buildi   |   |             |           |    |
| X   |    |     | 19. Perimeter of building is free of accumulation of weeds, grass, trash, etc.  |   |             |           |    |
|   |    | X   | 20. Emergency fuel shut off switch is present and labeled   |   |             |           |    |
|   |    | X   | 21. Gas appliances have UL approved tubing and connections. Meters, regulators protected from traffic   |   |             |           |    |
| Proposed Building Use: <u>Professional Office</u>   |    |     |   |   |             |           |    |
| <input checked="" type="checkbox"/> Existing Building <input type="checkbox"/> New Construction |    |     |   |   |             |           |    |

No calls to  
with address  
115 N.E. 1st Ave  
217 N. Oak  
5/25/11

**COMMENTS:**

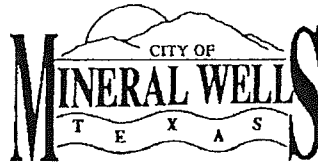
#1-Painted over & too small, #2-Needs sign, #3-No exit sign, #4-None, #5-Move one on RR wall to inside RR one inside a/c/heat closet, #6-Breakers show sewing machines, etc. #7-Extension cord power items and plugged into multiplug adapter in heat a/c closet. #8-Needs current tag/receipt/mounting/signs. #12-Cords in heat a/c close #4-Need emergency lighting near stairwell as well as luminous exit sign at stairwell

CO RECEIVED 11 / 05 / 07 OCCUPANT CONTACT Amanda Lollar - message 11 08 07

INSPECTED 11 / 07 / 07 TIME 10:00 am/pm INSPECTOR Robin Allen *(Signature)*

REINSPECTION     /    /     DEFICIENCIES CORRECTED  YES  NO





Post Office Box 460  
Mineral Wells, Texas 76068

COPY

May 9, 2005

Mr. Spiro Ayiomamitis  
1387 Dusserin Street  
Ontario, CA M6H4

Re: 101 E. Hubbard, Mineral Wells, Texas

Dear Mr. Spiro,

I contacted you by mail earlier this year concerning the bat boxes located on the west side of your building at the above referenced address. (I have enclosed a copy of this letter)

I received your message on my answering machine stating that the boxes could be removed, but still have not received anything in writing or by fax. Will you please mail or fax a brief permission statement to (940)328-7734.

I apologize for any inconvenience and look forward to rectifying this situation due to the complaints I continue to receive concerning the guano on the sidewalk. If you should have any questions, you may reach me at (940)328-7718.

Sincerely,

A handwritten signature in cursive script that reads "Michelle Bruton".

Michelle Bruton  
Health Inspector

September 20, 2004

To:  
City of Mineral Wells  
Health Code Inspector

Please inspect the Bat House located atop West wall of the old City National Bank building in the 100 Block of North Oak. The droppings from this bat house collects on the sidewalk and becomes a six to eight foot mess after several weeks, causing unpleasant, unsightly condition.

Please inspect and determine is this Bat House needs to be removed.

Thank you,

A handwritten signature in cursive script that reads "Randy Walker".

Randy Walker  
Mineral Wells, Texas

10

**Single Dispatch Detail Report**  
**Include Notes**

**MINERAL WELLS POLICE DEPARTMENT**

---

|                                   |                         |                             |
|-----------------------------------|-------------------------|-----------------------------|
| <b>Date:</b> 3/18/2011            | <b>CFS#:</b> 2011031125 | <b>Dispatcher ID#:</b> 376  |
| <b>Signal Desc:</b> WELFARE CHECK |                         |                             |
| <b>Source:</b> PHONE              | <b>Veh Lic Plate:</b>   | <b>Phone:</b> (940)325-3404 |
| <b>Location:</b> 217 OAK AV N     | <b>Apt#:</b>            | <b>Dist:</b> NORTHWEST      |
| <b>Business:</b>                  |                         |                             |

---

|                                       |              |                             |
|---------------------------------------|--------------|-----------------------------|
| <b>Caller:</b> LOLLAR,                | <b>Apt#:</b> | <b>Phone:</b> (940)325-3404 |
| <b>Address:</b> 217 OAK AV N          |              |                             |
| <b>C/S/Z:</b> MINERAL WELLS, TX 76067 |              |                             |

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|                               |                              |
|-------------------------------|------------------------------|
| <b>Time Received:</b> 14:12   | <b>Response Time:</b> 7 Min. |
| <b>Time Dispatched:</b> 14:14 | <b>Total Time:</b> 10 Min.   |
| <b>Time Arrived:</b> 14:19    |                              |
| <b>Time Cleared:</b> 14:22    |                              |

---

|                  |                    |               |                                |
|------------------|--------------------|---------------|--------------------------------|
| <b>Unit:</b> 187 | <b>Off ID:</b> 339 | HILL, MICHAEL | <b>Incident:</b> No            |
| <b>Unit:</b>     | <b>Off ID:</b>     |               | <b>Disp. Desc.:</b> ASSISTANCE |
| <b>Unit:</b>     | <b>Off ID:</b>     |               | GIVEN/ASSIGNMENT               |
|                  |                    |               | COMPLETE                       |

---

**Notes:**

Unable to locate. Building locked.

**Single Dispatch Detail Report  
Include Notes**

**MINERAL WELLS POLICE DEPARTMENT**

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|                                   |                         |                             |
|-----------------------------------|-------------------------|-----------------------------|
| <b>Date:</b> 12/1/2010            | <b>CFS#:</b> 2010120020 | <b>Dispatcher ID#:</b> 376  |
| <b>Signal Desc:</b> FORGERY       |                         |                             |
| <b>Source:</b> WALK IN            | <b>Veh Lic Plate:</b>   | <b>Phone:</b> (940)328-7770 |
| <b>Location:</b> 212 OAK AV S     | <b>Apt#:</b>            | <b>Dist:</b> SOUTHWEST      |
| <b>Business:</b> MINERAL WELLS PD |                         |                             |

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|                                       |              |                             |
|---------------------------------------|--------------|-----------------------------|
| <b>Caller:</b> LOLLAR, AMANDA         | <b>Apt#:</b> | <b>Phone:</b> (940)325-3404 |
| <b>Address:</b> 217 OAK AV N          |              |                             |
| <b>C/S/Z:</b> MINERAL WELLS, TX 76067 |              |                             |

---

|                               |                              |
|-------------------------------|------------------------------|
| <b>Time Received:</b> 15:39   | <b>Response Time:</b> 4 Min. |
| <b>Time Dispatched:</b> 15:40 | <b>Total Time:</b> 16 Min.   |
| <b>Time Arrived:</b> 15:43    |                              |
| <b>Time Cleared:</b> 15:55    |                              |

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|                  |                    |                    |  |
|------------------|--------------------|--------------------|--|
| <b>Unit:</b> 187 | <b>Off ID:</b> 357 | <b>CHANE, BRAD</b> | <b>Incident:</b> No  |
| <b>Unit:</b>     | <b>Off ID:</b>     |                    | <b>Disp. Desc.:</b> ASSISTANCE<br>GIVEN/ASSIGNMENT<br>COMPLETE |
| <b>Unit:</b>     | <b>Off ID:</b>     |                    |  |

**Notes:**

Assistance given. Waiting to be contacted by Harker Heights PD Det.

# Incident Report

MINERAL WELLS POLICE DEPARTMENT

CFS #2011051015

Incident #201105118

## Administrative:

Date Reported: 5/17/2011 CFS#: 2011051015  
Location Address: 212 OAK AV S District: SW Beat: Grid:  
Location: MINERAL WELLS PD  
Occurrence From: 05/17/2011 @ 15:57 To: 05/17/2011 @ 16:23 Day of Week: TUE  
Status Date: 5/17/2011 Status: ACTIVE  
Type: 50 Description: INFORMATION

Reportee: LOLLAR, AMANDA LORRAINE Address: 217 OAK AVE N  
Race: W Sex: F MINERAL WELLS, TX 76067  
DOB: 9/30/1955 Age: 55 Home Phone: (940)325-3404 Work Phone: ( ) -  
Mobile Phone: ( ) -

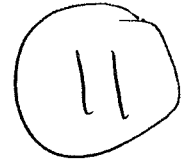
Source of Call: WALK IN Time Received: 15:57 Time Dispatched: 15:57 Time Arrived: 16:01 Time Cleared: 16:23  
Reporting Officer 1 ID: 307 Name: FELT, ERIC WILLIAM  
Reporting Officer 2 ID: Name:  
Investigating Officer ID: 347 Name: DAVIS, HAROLD NEAL



## Public Health Region 2 & 3, Zoonosis Control Program

Arlington: (817) 264-4492  
Connie Lindley, DVM  
Jan Buck, P H Technician  
Jay Sabatucci, P H Technician  
Paulette Thwing, Admin Technician

Abilene: (915) 690-4430  
Janice Widener, RN, P H Technician



### \*\*\* Rabies Notice \*\*\* Palo Pinto County

**Animal:** Bat

**Positive Rabies Results Reported:** September 9, 1999

**Location:** 114 NW 1<sup>st</sup> Street, Mineral Wells

**Description:** On September 8, 1999, in a store in downtown Mineral Wells, a 20 month old child was found standing over this bat that was on the floor and unable to fly. The mother pulled the child away and put a glass vase over the bat. Animal Control responded and because it was believed that the child was exposed, the bat was taken to a veterinarian and shipped to Austin for rabies testing.

**Human Exposures:** The child is taking the rabies post exposure treatment because he had a small wound with fresh blood on his cheek.

**Animal Exposures:** None

**1999 Positive Rabies Cases =** 1

| <u>Case No.</u> | <u>Animal</u> | <u>Incident Date</u> | <u>Location</u>         |
|-----------------|---------------|----------------------|-------------------------|
| VR9-4985        | Bat           | Sept. 8, 1999        | Mineral Wells, downtown |

**1998 Positive Rabies Cases =** 0

For more information contact: Texas Department of Health, Zoonosis Control Program, Arlington at (817) 264-4492 .

HEALTH & SAFETY CODE

CHAPTER 343. ABATEMENT OF PUBLIC NUISANCES

SUBCHAPTER A. GENERAL PROVISIONS

§ 343.002. DEFINITIONS. In this chapter:

- (1) "Abate" means to eliminate or remedy:
  - (A) by removal, repair, rehabilitation, or demolition;
  - (B) in the case of a nuisance under Section 343.011(c)(1), (8), or (9), by prohibition or control of access; and
  - (C) in the case of a nuisance under Section 343.011(c)(11), by removal, remediation, storage, transportation, disposal, or other means of waste management authorized by Chapter

Bat Wore  
Complaint

Mother caught the bat (baby bat) & took it  
Ray Craver -

Incident Report  
{ Scott Simonton -  
Animal Control Officer }

8:55 AM ~~8:55 AM~~ Holding Pattern - Providing results of tests  
after lunch today.

- General Sanitation laws -  
Harboring high risk rabies animals - allowing  
them in downtown.

Bat Conservation - Austin -  
Code Enforcement Laws

Bat Proof Bldg.

9:10 A. Verified by Delores - Appraisal District  
Beneficial Animal Teaching Society  
To Amanda Lollar Trustee  
217 N Oak MW

Definition of a Bat

9/19/99 3:00 p.m. called Jan Buck back - not in referred  
called to Dr. Lindley - Dr. Lindley advised  
me to speak to Debra Lester - Debra gave



me the Sec. to look under in Health & Safety Code - Sec. 341.001 part 12 Nuisances  
It was discussed that City Attorney compose letter under the <sup>City</sup> Health Official's signature Dr. Jarkenton. "Get the bats out of town."

3:10 Went to Mr. Howerton's office to inform him of findings

3:12 Called George Gault by Mr. Howerton - not in

3:15 George Gault returned call -

Informed him of positive test on bat  
he would need to compose letter for Dr. Jarkenton

George told us - we needed to inform Megan Stone of result of test.

• We thought Dr. Craver would be responsible for notifying Ms. Stone. George advised us to call & make sure Dr. Craver would notify Ms. Stone. If not, we should.

3:25 Mr. Howerton & I called Dr. Craver - he said he ~~had~~ just learned of it & he or his secretary would contact Ms. Stone.

# While You Were Away

To:

Blaine

Date:

9-9-99

Time:

1:25 pm

From:

Jim Buck ext 2494

Of:

with Health Dept.

Phone:

say test is

Message:

Loss on bat.  
-Dr. Lindley-

Debra  
fasted  
Capt. 2556

Message Taken By: BETH BLEVINS

CALLS FOR SERVICE SEPTEMBER

MINERAL WELLS POLICE DEPARTMENT

CFPS# 99090:

DISP #: \_\_\_\_\_

TYPE: P DATE:

OFFENSE:

LOCATION: \_\_\_\_\_

113 NE 1ST AVE

SHIFT: 1

PRIORITY: \_\_\_\_\_

UNIT: 159 OFFICER: 360

RADAR: \_\_\_\_\_

S/E: \_\_\_\_\_

HAZARD:  OFFICER DISP.:

AREA: 2A

TAG #: \_\_\_\_\_

DISPOSITION: A  W:  C:  A:

REC-:  DISP-:

ARRV-:

COMP-:

ARST-:  JAIL-:

TRANS TYPE: \_\_\_\_\_

BEG MILES: \_\_\_\_\_

END MILES: \_\_\_\_\_

CALLER: \_\_\_\_\_

MELINDA

PHONE: \_\_\_\_\_

BUS: \_\_\_\_\_

HOW REPORTED: P

TAKEN BY: 305

DISPATCH: 368

CHANGE: \_\_\_\_\_

ARREST 1st:  OFF:

2nd:

OFF:

3rd:

OFF:

OFFENSE 1st:  OFF:

2nd:

OFF:

3rd:

OFF:

VEHICLE #:  OFF:

ACCIDENT #:

OFF:

REMARKS: REF-BAT PINK BLDG BY DOWNTOWN VIDEO

took the bat to Dr. Craver and he sent the bat off to be tested for Rabies. The bat was already caught when I arrived. The mother said she did not know if the bat had bitten the child or not.

B/U OFF: \_\_\_\_\_ UNIT: \_\_\_\_\_

ARRV: \_\_\_\_\_

COMP: \_\_\_\_\_

OFF SIGNATURE: TD SHIFT SUPER: \_\_\_\_\_

LT. APPROVING: \_\_\_\_\_

REVIEWED: \_\_\_\_\_

*Shaci Dempsay*

12

**From:** Scott Vaca  
**Sent:** Friday, April 08, 2011 3:12 PM  
**To:** Butch Shoop  
**Cc:** David Sinclair; Craig Hunter  
**Subject:** Complaint on Wildlife Rehabber

Major:

Megan Russell in Permits has received complaints on the following wildlife rehabilitator:

Amanda Lollar, Bat World Sanctuary  
217 N. Oak Ave.  
Mineral Wells, Texas 76067

Most of the complaint issues are local law enforcement concerns. However, Megan is concerned about the allegation that Ms. Lollar is intentionally breeding bats, which is a violation of the permit conditions. Please assign or forward this complaint as you see fit. Thanks.

**Scott Vaca**  
**Assistant Chief of Wildlife Enforcement**

**From:** David Modgling  
**Sent:** Thursday, April 14, 2011 5:23 PM

Matt and I went to the Bat World Sanctuary and talked to Amanda Lollar and took a tour of the facilities. There are bats that are reproducing at the facility.

**PHONE CALL**

13

DATE 8/12 TIME 2:25 A.M.  
P.M.

FOR Anon

PHONED

M.

RETURNED YOUR CALL

C.

FAX

PLEASE CALL

PHONE

MOBILE

NUMBER

EXTENSION

WILL CALL AGAIN

MESSAGE

Shinck of Bat Sanctuary

CAME TO SEE YOU

ah

WANTS TO SEE YOU

TOPS

FORM 4003

SIGNED

**Laura Russell**

---



**From:** Karen Pianka  
**Sent:** Tuesday, May 17, 2011 10:36 AM  
**To:** Elsa Bosque  
**Cc:** Karen Pianka  
**Subject:** Responsive documentation to Open Records Request 2011-05-R15 Cummins, Mary: FW: Amanda Lollar

Karen Pianka  
Wildlife Permits Coordinator  
Texas Parks & Wildlife  
4200 Smith School Road  
Austin, Texas 78744  
(512) 389-4491

**From:** wpoffice  
**Sent:** Friday, May 06, 2011 9:03 AM  
**To:** 'Becky R.'  
**Subject:** RE: Amanda Lollar

Ms.  
Thank you for taking the time to contact the Texas Parks and Wildlife Department (TPWD) to express your concern about a currently permitted wildlife rehabilitator. When a concern such as yours is brought forward, it is forwarded to Law Enforcement for evaluation. Depending upon the Law Enforcement findings, it is possible that further action may be taken, up to and including revocation of the wildlife permit. In some cases a concern is raised for which another agency has jurisdiction, such as the Texas Department of Health. In these cases, the relevant information is forwarded to the appropriate agency. You can be assured that TPWD is continuing to monitor and evaluate this situation.

Thank you,  
Wildlife Permits

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**From:** Becky R. [mailto:████████████████████]  
**Sent:** Wednesday, May 04, 2011 3:13 PM  
**To:** wpoffice  
**Subject:** Amanda Lollar

Attn: Texas Parks & Wildlife

Good afternoon,

I recently read an article about Amanda Lollar, a so-called "wildlife rehabilitator" in Mineral Wells. I have looked at some of the accompanying photos and videos of the bats she has mangled and killed. These images made me physically ill.

I am writing to you to ask that you please investigate this woman's actions and take immediate action to ensure that she does no further harm to any beings. It is my feeling that someone who demonstrates such a blatant disregard for the suffering of other beings should not be granted the designation of wildlife rehabilitator, nor should she ever be allowed to hold such a permit again. I can only hope that Ms. Lollar will be stopped immediately and charged for these inexcusable actions.

In addition to the bats she has injured and killed, I understand there are also dogs and cats in her care that also require immediate veterinary assistance. I respectfully ask that you ensure that these animals are provided with the necessary treatment and that Ms. Lollar be banned from having any animals in her care going forward.

15

**Laura Russell**

---

**From:** Karen Pianka  
**Sent:** Tuesday, May 17, 2011 10:36 AM  
**To:** Elsa Bosque  
**Cc:** Karen Pianka  
**Subject:** Responsive documentation to Open Records Request 2011-05-R15 Cummins, Mary: FW: Lollar: Illegal acts and animal cruelty.

Karen Pianka  
Wildlife Permits Coordinator  
Texas Parks & Wildlife  
4200 Smith School Road  
Austin, Texas 78744  
(512) 389-4491

---

**From:** wpoffice  
**Sent:** Friday, May 06, 2011 9:05 AM  
**To:**  
**Subject:** RE: Lollar: Illegal acts and animal cruelty.

Ms

Thank you for taking the time to contact the Texas Parks and Wildlife Department (TPWD) to express your concern about a currently permitted wildlife rehabilitator. When a concern such as yours is brought forward, it is forwarded to Law Enforcement for evaluation. Depending upon the Law Enforcement findings, it is possible that further action may be taken, up to and including revocation of the wildlife permit. In some cases a concern is raised for which another agency has jurisdiction, such as the Texas Department of Health. In these cases, the relevant information is forwarded to the appropriate agency. You can be assured that TPWD is continuing to monitor and evaluate this situation.

Thank you,  
Wildlife Permits

---

**From:** [mailto:██████████]  
**Sent:** Tuesday, May 03, 2011 1:19 AM  
**To:** wpoffice  
**Subject:** Lollar: Illegal acts and animal cruelty

I am writing to urge you to please revoke Amanda Lollar's USDA and wildlife rehabilitation permits. I have included below links to photos and videos of Amanda Lollar's illegal activity and cruelty. I have been informed that Amanda Lollar is a "wildlife rehabilitator" who treats bats in Mineral Wells, Texas. She is not a veterinarian yet she illegally performs surgery. She illegally possesses and uses controlled substances such as Isoflurane. Her illegal acts were reported to the Texas Veterinary Board. They stated, "she committed animal cruelty and should be reported to the police."

Amanda Lollar purchases, possesses, and administers rabies vaccinations to bats. Only veterinarians may possess and administer rabies vaccinations to animals because they can cause an animal to die if not administered properly. Lollar does not report rabid bats to the Texas Health Department. Instead, she euthanizes them illegally with controlled substances, then dumps their bodies into the regular trash. Her illegal acts were reported to the Texas Health Department. They stated that "her acts are criminal and should be reported to the police."

Both your agency and the USDA were contacted about Amanda Lollar's illegal activity as they control her wildlife rehabilitation permit. Your agency, Texas Parks & Recreation stated, "wildlife rehabilitators cannot perform surgery, and they cannot have controlled substances." The USDA stated that Lollar violated the Animal Welfare Act by "not providing proper veterinary care."

16

A licensed veterinarian saw the videos and stated, "This is a nightmare! No one but a veterinarian should perform surgery. Report her to the state veterinary board. She should go to jail." It is clear when viewing the photos and videos that Amanda Lollar does not regard the suffering she inflicts upon animals and should have her permits revoked.

Photos of abuse, illegal surgery and controlled substances are here  
<http://www.flickr.com/photos/62357242@N04>

Video of Amanda Lollar giving illegal rabies vaccination to a baby bat  
[http://www.youtube.com/watch?v=1q\\_tSgx7yeE](http://www.youtube.com/watch?v=1q_tSgx7yeE)

Video of a skinny, shaking, dying pallid bat at Bat World Sanctuary  
<http://www.youtube.com/watch?v=rx21JohdwQE>

Video of Amanda Lollar holding a rabid bat in her hand without gloves. Afterwards she illegally euthanized it with Isoflurane pictured in the background then she dumped it in the regular trash  
<http://www.youtube.com/watch?v=zaqiiJwFPaQ>

Thank you for your time  
Respectfully,



17

**Laura Russell**

---

**From:** Karen Pianka  
**Sent:** Tuesday, May 17, 2011 10:37 AM  
**To:** Elsa Bosque  
**Cc:** Karen Pianka  
**Subject:** Responsive documentation to Open Records Request 2011-05-R15 Cummins, Mary: FW: Bat World Sanctuary

Karen Pianka  
Wildlife Permits Coordinator  
Texas Parks & Wildlife  
4200 Smith School Road  
Austin, Texas 78744  
(512) 389-4491

**From:** wpooffice  
**Sent:** Friday, May 06, 2011 9:05 AM  
**To:** 'Debbie'  
**Subject:** RE: Bat World Sanctuary

Dear Ms. Rankin,

Thank you for taking the time to contact the Texas Parks and Wildlife Department (TPWD) to express your concern about a currently permitted wildlife rehabilitator. When a concern such as yours is brought forward, it is forwarded to Law Enforcement for evaluation. Depending upon the Law Enforcement findings, it is possible that further action may be taken, up to and including revocation of the wildlife permit. In some cases a concern is raised for which another agency has jurisdiction, such as the Texas Department of Health. In these cases, the relevant information is forwarded to the appropriate agency. You can be assured that TPWD is continuing to monitor and evaluate this situation.

Thank you,

Wildlife Permits

-----Original Message-----

**From:** [redacted]  
**Sent:** Monday, May 02, 2011 2:48 PM  
**To:** wpooffice  
**Subject:** Bat World Sanctuary

Dear Parks and Recreation,

I have long been a fan of Bat World Sanctuary, but lately, the videos that have been put out are horrifying to me. Please investigate and prosecute Amanda Lollar for animal abuse.

It breaks my heart to write this, as I have long supported Bat World and love what it stands for; however, what she is doing, illegal surgeries, etc... can not be supported.

I very much hope that she is fully investigated and that if found guilty of abuse, is prosecuted to the full extent of the law.

Sincerely,

18

Laura Russell

---

**From:** Karen Pianka  
**Sent:** Tuesday, May 17, 2011 10:37 AM  
**To:** Elsa Bosque  
**Cc:** Karen Pianka  
**Subject:** Responsive documentation to Open Records Request 2011-05-R15 Cummins, Mary: FW: Amanda Lollar

Karen Pianka  
Wildlife Permits Coordinator  
Texas Parks & Wildlife  
4200 Smith School Road  
Austin, Texas 78744  
(512) 389-4491

---

**From:** wpooffice  
**Sent:** Friday, May 06, 2011 9:07 AM  
**To:** 'Jane Charneco'  
**Cc:** 'policechief@mineralwellstx.gov'; 'robert.m.gibbens@usda.gov'  
**Subject:** RE: Amanda Lollar

Dear Ms.

Thank you for taking the time to contact the Texas Parks and Wildlife Department (TPWD) to express your concern about a currently permitted wildlife rehabilitator. When a concern such as yours is brought forward, it is forwarded to Law Enforcement for evaluation. Depending upon the Law Enforcement findings, it is possible that further action may be taken, up to and including revocation of the wildlife permit. In some cases a concern is raised for which another agency has jurisdiction, such as the Texas Department of Health. In these cases, the relevant information is forwarded to the appropriate agency. You can be assured that TPWD is continuing to monitor and evaluate this situation.

Thank you,  
Wildlife Permits

---

**From:** Jane [mailto:████████████████████]  
**Sent:** Sunday, May 01, 2011 8:00 PM  
**To:** policechief@mineralwellstx.gov; Robert.M.Gibbens@usda.gov; wpooffice  
**Subject:** Re: Amanda Lollar

Dear Sirs:

Please do something to stop Amanda Lollar's torture of bats!! She does not know what she is doing medically, and what is more she doesn't care. Or perhaps she does know and, and thrives on the pain and death of helpless creatures. Why should her need to torture these bats take precedence over the pain and death of these unfortunate animals? On top of her incompetence she is unlicensed, which is illegal. Please do whatever is in your power to stop her and her cruel practices. Thank you for your time and for reading this.

Sincerely,

19

**Laura Russell**

---

**From:** Karen Pianka  
**Sent:** Tuesday, May 17, 2011 10:37 AM  
**To:** Elsa Bosque  
**Cc:** Karen Pianka  
**Subject:** Responsive documentation to Open Records Request 2011-05-R15 Cummins, Mary: FW: Amanda Lollar

Karen Pianka  
Wildlife Permits Coordinator  
Texas Parks & Wildlife  
4200 Smith School Road  
Austin, Texas 78744  
(512) 389-4491

---

**From:** wpooffice  
**Sent:** Friday, May 06, 2011 9:08 AM  
**To:** 'jane leigh'  
**Subject:** RE: Amanda Lollar

Dear Ms.

Thank you for taking the time to contact the Texas Parks and Wildlife Department (TPWD) to express your concern about a currently permitted wildlife rehabilitator. When a concern such as yours is brought forward, it is forwarded to Law Enforcement for evaluation. Depending upon the Law Enforcement findings, it is possible that further action may be taken, up to and including revocation of the wildlife permit. In some cases a concern is raised for which another agency has jurisdiction, such as the Texas Department of Health. In these cases, the relevant information is forwarded to the appropriate agency. You can be assured that TPWD is continuing to monitor and evaluate this situation.

Thank you,  
Wildlife Permits

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**From:** jane leigh [mailto:████████████████████]  
**Sent:** Monday, May 02, 2011 12:55 PM  
**To:** wpooffice  
**Subject:** Amanda Lollar

I am writing about a horrific case of animal abuse I recently read about involving Amanda Lollar and Batword Sanctuary, I ask that this abuse is thoroughly investigated and not taken lightly and that necessary action is carried out to prevent this woman from causing any more harm. For your information I am sending a few links along with my email of videos and photo of Amanda performing illegal surgery on conscious bats without any pain relief. The animals in the videos can clearly be seen fighting against Amanda before having their teeth pulled out, in another she accidentally pulls out the bat's vagina and uterus because she cut too much, this woman should NOT be working with animals! These poor bats died in agony and for no reason!

Amanda Lollar should be prosecuted for animal cruelty and abuse and her permits revoked!

Thank you for your time,

20

**Laura Russell**

---

**From:** Karen Pianka  
**Sent:** Tuesday, May 17, 2011 10:39 AM  
**To:** Elsa Bosque  
**Cc:** Karen Pianka  
**Subject:** Responsive documentation to Open Records Request 2011-05-R15 Cummins, Mary: FW: Amanda Lollar

Karen Pianka  
Wildlife Permits Coordinator  
Texas Parks & Wildlife  
4200 Smith School Road  
Austin, Texas 78744  
(512) 389-4491

**From:** wpooffice  
**Sent:** Friday, May 06, 2011 9:10 AM  
**To:** 'mhostrup'  
**Cc:** 'robert.m.gibbens@usda.gov'  
**Subject:** RE: Amanda Lollar

Thank you for taking the time to contact the Texas Parks and Wildlife Department (TPWD) to express your concern about a currently permitted wildlife rehabilitator. When a concern such as yours is brought forward, it is forwarded to Law Enforcement for evaluation. Depending upon the Law Enforcement findings, it is possible that further action may be taken, up to and including revocation of the wildlife permit. In some cases a concern is raised for which another agency has jurisdiction, such as the Texas Department of Health. In these cases, the relevant information is forwarded to the appropriate agency. You can be assured that TPWD is continuing to monitor and evaluate this situation.

Thank you,  
Wildlife Permits

---

**From:** mhostrup [mailto:████████████████████]  
**Sent:** Sunday, May 01, 2011 8:14 PM  
**To:** Robert.M.Gibbens@usda.gov  
**Cc:** wpooffice  
**Subject:** Re: Amanda Lollar

Hello,  
My Godchild alerted me to a video she saw on facebook regarding bats possibly being surgically abused. I watched the video too and now it's no wonder she is upset.  
This is not a learning tool, this was someone who obviously didn't know what they were altogether doing and caused harm to the bats.  
Please take away the license from this 'veterinarian' Amanda Lollar. Send her to the proper place. She needs to go back to the basics veterinarian courses and have compassion for patients under surgery by giving them proper anesthesia.

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illegal acts were reported to the Texas Veterinary Board. They stated, "she committed animal cruelty and should be reported to the police."

Amanda Lollar purchases, possesses, and administers rabies vaccinations to bats. Only veterinarians may possess and administer rabies vaccinations to animals because they can cause an animal to die if not administered properly. Lollar does not report rabid bats to the Texas Health Department. Instead, she euthanizes them illegally with controlled substances, then dumps their bodies into the regular trash. Her illegal acts were reported to the Texas Health Department. They stated that "her acts are criminal and should be reported to the police."

Texas Parks & Recreation was contacted about Amanda Lollar's illegal activity as they control her wildlife rehabilitation permit. They stated, "wildlife rehabilitators cannot perform surgery, and they cannot have controlled substances." The USDA was also contacted because Lollar has a USDA exhibitor permit to exhibit her bats. Lollar violated the Animal Welfare Act by "not providing proper veterinary care." Texas Parks & Recreation and the USDA are currently investigating Amanda Lollar and Bat World Sanctuary.

In another video, Amanda Lollar can be seen using forceps to pull out the teeth of a conscious bat. The bat is clearly kicking and trying to bite Lollar. After Lollar yanks two of his teeth out the bat can be seen bleeding. Lollar uses this video as an example of "proper" dental surgery in her website <http://www.batworld.org>.

Video of Amanda Lollar pulling out the teeth of a conscious bat. GRAPHIC!!!  
[http://www.youtube.com/watch?v=g\\_GN1GjtbiU](http://www.youtube.com/watch?v=g_GN1GjtbiU)

A visitor to the sanctuary last year found a one-winged dead bat under Amanda Lollar's desk. It had been dead for at least two days as insects were eating it. It appeared to have died from lack of food and water. When Lollar was shown the dead bat she said the bat "was one of my favorite bats." She obviously cannot care for the bats she has if her favorite bat could go missing for days and not be noticed.

The visitor also noted that Lollar has seven dogs even though she has no kennel permit. They are all debarked. Some of the dogs have medical and dental issues, as well as very long nails. They are never walked. One of the dogs cannot use its rear legs, so she's forced to drag herself around. Lollar's outdoor cats also need veterinary care as they appear to have fleas, worms, and dental issues.

A licensed veterinarian saw the videos and stated, "This is a nightmare! No one but a veterinarian should perform surgery. Report her to the state veterinary board. She should go to jail." A viewer of the episiotomy video stated, "That is horrific! They should arrest her immediately. She pulled out her vagina! She should never be allowed around animals ever again because she has a complete disregard for their feelings of pain."

It should be noted that Lollar used photos from this bat's botched episiotomy in her website and book to show "proper episiotomy procedures." What she claims happened in her book is not what happened in real life as evidenced by the video.

Photos of abuse, illegal surgery and controlled substances are here  
<http://www.flickr.com/photos/62357242@N04>

Video of Amanda Lollar giving illegal rabies vaccination to a baby bat  
[http://www.youtube.com/watch?v=1g\\_tSgx7yeE](http://www.youtube.com/watch?v=1g_tSgx7yeE)

Video of a skinny, shaking, dying pallid bat at Bat World Sanctuary  
<http://www.youtube.com/watch?v=rx21JohdwQE>

Video of Amanda Lollar holding a rabid bat in her hand without gloves. Afterwards she illegally euthanized it

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**Laura Russell**

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**From:** Karen Pianka  
**Sent:** Tuesday, May 17, 2011 10:40 AM  
**To:** Elsa Bosque  
**Cc:** Karen Pianka  
**Subject:** Responsive documentation to Open Records Request 2011-05-R15 Cummins, Mary: FW: Amanda Lollar

Karen Pianka  
Wildlife Permits Coordinator  
Texas Parks & Wildlife  
4200 Smith School Road  
Austin, Texas 78744  
(512) 389-4491

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**From:** wpooffice  
**Sent:** Monday, May 09, 2011 8:52 AM  
**To:** [REDACTED]  
**Subject:** RE: Amanda Lollar

Dear Mr. Jones,

Thank you for taking the time to contact the Texas Parks and Wildlife Department (TPWD) to express your concern about a currently permitted wildlife rehabilitator. When a concern such as yours is brought forward, it is forwarded to Law Enforcement for evaluation. Depending upon the Law Enforcement findings, it is possible that further action may be taken, up to and including revocation of the wildlife permit. In some cases a concern is raised for which another agency has jurisdiction, such as the Texas Department of Health. In these cases, the relevant information is forwarded to the appropriate agency. You can be assured that TPWD is continuing to monitor and evaluate this situation.

Thank you,  
Wildlife Permits

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**From:** [REDACTED]  
**Sent:** Sunday, May 08, 2011 2:19 PM  
**To:** Robert.M.Gibbens@usda.gov; wpooffice  
**Subject:** Amanda Lollar

To whom it may concern -

I am sorry to bother you, but a case of animal abuse has recently come to my attention involving someone called Amanda Lollar performing surgery when not a vet, connected to a bat surgery. Whilst I am not from the USA I feel that the welfare of animals as with people is the concern of all of us around the globe. For this reason I implore you to give serious consideration to the removal of Ms Lollar's USDA & wildlife rehabilitation permits.

Thank you for your time,

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Laura Russell

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**From:** Karen Pianka  
**Sent:** Tuesday, May 17, 2011 10:40 AM  
**To:** Elsa Bosque  
**Cc:** Karen Pianka  
**Subject:** Responsive documentation to Open Records Request 2011-05-R15 Cummins, Mary: FW: Bat World Sanctuary and Amanda Lollar

Karen Pianka  
Wildlife Permits Coordinator  
Texas Parks & Wildlife  
4200 Smith School Road  
Austin, Texas 78744  
(512) 389-4491

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**From:** wpoffice  
**Sent:** Friday, May 06, 2011 9:11 AM  
**To:** [REDACTED]  
**Cc:** 'policechief@mineralwellstx.gov'; 'robert.m.gibbens@usda.gov'  
**Subject:** RE: Bat World Sanctuary and Amanda Lollar

Dear Jody,

Thank you for taking the time to contact the Texas Parks and Wildlife Department (TPWD) to express your concern about a currently permitted wildlife rehabilitator. When a concern such as yours is brought forward, it is forwarded to Law Enforcement for evaluation. Depending upon the Law Enforcement findings, it is possible that further action may be taken, up to and including revocation of the wildlife permit. In some cases a concern is raised for which another agency has jurisdiction, such as the Texas Department of Health. In these cases, the relevant information is forwarded to the appropriate agency. You can be assured that TPWD is continuing to monitor and evaluate this situation.

Thank you,  
Wildlife Permits

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**From:** [REDACTED]  
**Sent:** Sunday, May 01, 2011 9:01 PM  
**To:** policechief@mineralwellstx.gov; Robert.M.Gibbens@usda.gov; wpoffice  
**Subject:** Bat World Sanctuary and Amanda Lollar

<http://www.indybay.org/newsitems/2011/05/01/18678593.php>

To Whom it Concerns,

I am writing to express my extreme displeasure and disturbance by the graphic content in the link above which includes definite acts of animal cruelty being performed by Amanda Lollar. It is my strong hope that her license be revoked and she be held accountable to the fullest extent the laws allow. It is most heinous when somebody who holds special privileges acts as though they are above reproach when one would intuitively think somebody in her position would act with an elevated sense of concern for those beings who, in these cases, were unfortunate enough to find themselves under her 'care'.

Please keep me updated and thank you for investigating and hopefully charging this woman.