

April 29, 2024

Dr. Lewis R. Dinges  
 Executive Director  
 Texas Animal Health Commission  
[execdir@tahc.texas.gov](mailto:execdir@tahc.texas.gov)

**Re: Request to Investigate Texas Bush Tracks for Unlawful Import of Horses**

Dear Dr. Dinges:

I am writing on behalf of People for the Ethical Treatment of Animals (PETA) to respectfully urge the Texas Animal Health Commission (“Commission”) to investigate race participants at the nearly 50 unregulated Quarter Horse tracks (“bush tracks”) in the state<sup>1</sup> for the apparent illegal importation of horses from other states without the required testing and documentation, in violation of the Commission’s regulations.<sup>2</sup>

PETA’s investigation into bush tracks in the United States has revealed that out-of-state race teams commonly, if not exclusively, import horses without required documentation or equine infectious anemia (EIA) testing. PETA’s research has confirmed that this dangerous conduct apparently extends to bush tracks across Texas.

All animals entering Texas must comply with all applicable health requirements set by the Commission.<sup>3</sup> In light of equines’ potential to spread incurable contagious disease, all entering Texas “shall have a certificate of veterinary inspection and proof of a negative EIA test within the previous 12 months prior to entering Texas, along with unique and permanent forms of identification.”<sup>4</sup> CVIs must contain the health status of each animal being imported into the state.<sup>5</sup> The negative test results, together with the name of the laboratory conducting the test, must be shown on the CVI.<sup>6</sup> Alternatively, a completed VS Form 10-11 (EIA Laboratory Test) may be attached to the CVI.<sup>7</sup> Only test results from USDA-approved laboratories are acceptable.<sup>8</sup> If an equine receives a positive EIA test, the animal may not enter Texas without written permission from the Executive Director of the Commission.<sup>9</sup> Importation of equines without the required CVI and negative test result documentation is a misdemeanor.<sup>10</sup>

<sup>1</sup> A list of all Texas tracks PETA has identified to date is attached as Exhibit 1.

<sup>2</sup> 4 Tex. Admin. Code §§ 51.13, 51.2, 49.1.

<sup>3</sup> 4 Tex. Admin. Code § 51.2(a)(1).

<sup>4</sup> *Id.* § 51.13(a). Additionally, all equines at facilities or locations where they commingle must also have a negative EIA test within one year prior to assembly—regardless of whether they have been imported to the state for the event. 4 Tex. Admin. Code § 49.1(o).

<sup>5</sup> *Id.* § 51.2(b).

<sup>6</sup> *Id.* § 51.13(a).

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

<sup>9</sup> *Id.* § 51.5(b)(2).

<sup>10</sup> Tex. Agric. Code § 161.143.

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Despite numerous race teams bringing in horses from out-of-state, a public records request to the Commission reveals that **no CVIs appear to have been submitted to the agency** for any horse imported for unlicensed racing in January and February 2024.

For example, looking to only two of the most active bush track facilities in Texas, 3 Amigos Race Track in Odessa and Carril Santa Teresa in Amarillo—which consistently hold regular events that assemble up to dozens of race teams each—participating race teams from out-of-state in this two-month period include, but are not limited to, the following:

Race Team	State of Origin
Cuadra Sierra Brava	Oklahoma
Cuadra Chihuahua	Oklahoma
Cuadra Ballezano	Colorado
Cuadra Solis	Colorado
Cuadra Flecha Boyz	Colorado
Cuadra Chalanés	Colorado
Cuadra Lema	Arizona

More specifically, there is evidence suggesting that at least five horses likely entered Texas from other states in the days before a [February 3, 2024, event at Carril Santa Teresa](#), without accompanying CVIs—El Turco from Arizona-based Cuadra Lema;<sup>11</sup> at least two horses, including El Manchas, from Colorado-based Cuadra Chalanés;<sup>12</sup> and at least two horses, including El León Rasurado, from Colorado-based Cuadra Solis.<sup>13</sup>

EIA is a highly infectious and potentially fatal blood-borne virus for equine species, with no vaccine or treatment currently available.<sup>14</sup> “Since 2017, a new high-risk population for EIA infection has emerged: current or former Quarter Horse racehorses, many with ties to unsanctioned (bush track) racing.”<sup>15</sup> In Texas, the importation of out-of-state horses for bush track racing has apparently caused or contributed to EIA outbreaks. At least seven Quarter Horses in Ector County, the county in which the 3 Amigos racing facility is located, were confirmed to have been infected with EIA between July and September 2023.<sup>16</sup>

<sup>11</sup> Cuadra Lema posted a Facebook [photo](#) on January 30, 2024, of El Turco (registered name “TURCOTTE”) during his last workout “before going to represent Arizona at the Godfather race.” (translated from Spanish). A subsequent [video](#) posted on January 31 shows El Turco being led into a trailer, “heading to Amarillo,” (translated from Spanish) indicating that he was being transported from Arizona. Cuadra Lema’s Facebook shows a “Check-in” at Carril Santa Teresa on February 1.

<sup>12</sup> According to the event flyer, Cuadra Chalanés had at least one other horse racing on February 3, in addition to El Manchas. A February 2 Facebook [video](#) shows El Manchas being unloaded from a trailer, presumably at Carril Santa Teresa. It was [reposted](#) by Cuadra Chalanés on the same day. In the video, a second horse can be seen in the trailer, and another horse being walked.

<sup>13</sup> According to the event flyer, Cuadra Solis had at least one other horse racing on February 3, in addition to El León Rasurado (registered name “KB APOLLITICAL TRUMP”), who was seen racing at the event in a February 3 Facebook [reel](#).

<sup>14</sup> Tim Cordes, DVM & Charles Issel, DVM, Ph.D., Equine Infectious Anemia, Am. Ass’n of Equine Practitioners (2020), <https://aaep.org/horsehealth/equine-infectious-anemia>; *see also* Equine Infectious Anemia (EIA), APHIS (Sep. 2006), [https://www.aphis.usda.gov/sites/default/files/eia\\_info\\_sheet.pdf](https://www.aphis.usda.gov/sites/default/files/eia_info_sheet.pdf).

<sup>15</sup> Equine Infectious Anemia in Current or Former Quarter Horse Racehorses, APHIS (Feb. 2023), <https://www.aphis.usda.gov/aphis/newsroom/stakeholder-info/stakeholder-messages/animal-health-news/eia-quarter-horses>.

<sup>16</sup> Public records received from the Commission indicate that the initial five confirmed horses were tested and confirmed in July, while the remaining two were tested and confirmed infected on a previously reported Ector County premises in September.

PETA’s research uncovered that at least five of these Quarter Horses were bred in the U.S. before being relocated to Mexico to race for Cuadra Esperanza, based in Chihuahua.<sup>17</sup> According to records received from the Commission, all five of these horses were euthanized in Texas on July 17.

In addition to those noted above, at least seven Quarter Horses in Midland County, Texas were confirmed infected with EIA in February 2023.<sup>18</sup> Similarly, three horses in Southern California tested positive and were euthanized between January and March 2024, with the EIA exposure attributed to unsanctioned racing.<sup>19</sup> In 2023, twenty horses in North Carolina tested positive for EIA across nine different counties.<sup>20</sup> The majority of these cases are reported to be associated with unlicensed horse racing.<sup>21</sup> In 2022, five horses tested positive for equine infectious anemia in South Carolina.<sup>22</sup> “All five cases stem[med] from a bush track horse racing training facility,” and all were euthanized.<sup>23</sup> In 2022, the last year for which USDA’s Annual Testing & Case Summary Report has been released, the agency reported 96 positive equine infectious anemia cases on 45 premises.<sup>24</sup> Eighty-four of these confirmed cases were “in either current or former Quarter Horse racehorses” and spread “through unhygienic practices” including “re-using needles, syringes, and IV sets.”<sup>25</sup> The USDA asserts that “EIA-positive cases in this emerging high-risk population are frequently found in clusters, indicating a horse trainer or owner repeatedly used unhygienic practices that caused the disease to spread to multiple horses.”<sup>26</sup> Indeed, PETA documented horses on tracks in Georgia being injected with controlled substances including cocaine and methamphetamine, and online videos show Texas race participants with syringes in their hands and pockets. The Texas Racing Commission recently acknowledged these tracks are “largely ungoverned spaces” where horses “are more likely to be injected with prohibited and dangerous substances, subjected to other mistreatment, unscrupulous practices, and may be more susceptible to infectious diseases that can

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<sup>17</sup> Somos Carrereros, Facebook (Aug. 24, 2022), <https://www.facebook.com/somoscarrereros/posts/pfbid0t93UPF7LHJ2vjATCAkTYLCWd8HK3mnzYGPYquZj9NF8ci1cBhkWDKTsc7PZkqbu3l>; Carreras del Oeste, Facebook (May 16, 2023), <https://www.facebook.com/CarrerasDelOeste/posts/pfbid02FbvqYDhCvgyiVL76qLrcRwADbb4sAttZJwB3GTqD23e1PoP8QeK5d4oxucC4rxNnl>; Seguimos Corriendo En Cuba y USA, Facebook (Nov. 19, 2022), <https://www.facebook.com/cubanoscarrereros/posts/pfbid02pUJPMzM6YZm4rqBpHMEbtk8PHhFjGAHijNd898CPjuyLMkShM8fagBVgLnAoCdxil>; Caballos D Carreras, Facebook (Nov. 8, 2022), <https://www.facebook.com/cubanoscarrereros/posts/pfbid02pUJPMzM6YZm4rqBpHMEbtk8PHhFjGAHijNd898CPjuyLMkShM8fagBVgLnAoCdxil>; Somos Carrereros, Facebook (Jun. 21, 2022), <https://www.facebook.com/cubanoscarrereros/posts/pfbid02pUJPMzM6YZm4rqBpHMEbtk8PHhFjGAHijNd898CPjuyLMkShM8fagBVgLnAoCdxil>; Cuadra La Esperanza, Facebook (Jul. 18, 2023), <https://www.facebook.com/esperanzaracing/posts/pfbid02BWug2y2gnzn3xy2JzmXT14CfodvYULCeFMV76YCswj7jLNGkKk5SAk9kgnxpfKQKI>.

<sup>18</sup> See Seven Horses Positive for EIA in Texas, *The Horse* (Feb. 13, 2023), <https://thehorse.com/1120530/seven-horses-positive-for-eia-in-texas/>.

<sup>19</sup> 3 California Horses Positive for EIA, *EquiManagement* (Apr. 1, 2024), <https://equimanagement.com/news/edcc-health-watch/3-california-horses-positive-for-eia/>.

<sup>20</sup> 20 Confirmed EIA Cases in North Carolina, *The Horse* (Feb. 3, 2023), <https://thehorse.com/1121360/20-confirmed-eia-cases-in-north-carolina/>.

<sup>21</sup> Equine Infectious Anemia Found in 19 Horses in Nine Counties, *Morning AgClips* (Feb. 5, 2023), <https://www.morningagclips.com/equine-infectious-anemia-found-in-19-horses-in-nine-counties/>.

<sup>22</sup> Tom Hallman, More SC Horses Found to Have Contracted Equine Infectious Anemia, *Clemson News* (Aug. 19, 2022), [https://news.clemson.edu/more-sc-horses-found-to-have-contracted-equine-infectious-anemia/?utm\\_source=rss&utm\\_medium=rss&utm\\_campaign=more-sc-horses-found-to-have-contracted-equine-infectious-anemia](https://news.clemson.edu/more-sc-horses-found-to-have-contracted-equine-infectious-anemia/?utm_source=rss&utm_medium=rss&utm_campaign=more-sc-horses-found-to-have-contracted-equine-infectious-anemia).

<sup>23</sup> *Id.*

<sup>24</sup> 2022 Equine Infectious Anemia Cases in the United States, APHIS, 1 (Jun. 2023), [https://www.aphis.usda.gov/animal\\_health/downloads/animal\\_diseases/2022-eia-report.pdf](https://www.aphis.usda.gov/animal_health/downloads/animal_diseases/2022-eia-report.pdf).

<sup>25</sup> *Id.* at 4.

<sup>26</sup> *Id.*

then be spread at legitimate tracks.”<sup>27</sup>

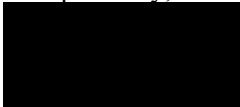
As demonstrated, it appears that many horses the above-noted teams entered to race in early 2024 were likely imported into Texas in violation of state law, and the unlawful importation of horses for bush track racing in the state is a widespread issue beyond the small sample identified in this letter. Moreover, given the high risk for the rapid spread of EIA among Quarter Horse racing populations, these violations risk a contagious and infectious disease outbreak in the state.

Many unlicensed tracks advertise the racing teams that will participate in upcoming events, including out-of-state teams. For example, Carril Santa Teresa frequently boasts that teams from other states will take part in racing events, and specific races are often promoted as races between different states. In advertisements for Carril Santa Teresa’s April 6, 2024, event, one Facebook post highlights where the participating teams are from, including Oklahoma, Arizona, Colorado, and Kansas.<sup>28</sup> In a flyer for the same event, one race is advertised as “Colorado vs Midland.”<sup>29</sup> This bush track consistently exposes that several out-of-state teams travel to Amarillo to compete in races and will almost certainly continue to do so, potentially making it easier for the Commission to identify when and from where unlawful importation occurs and the individuals involved. Other tracks similarly identify racing teams whose home locations can be ascertained. Based on the total lack of required CVIs by racing teams in January and February, it is highly likely that future out-of-state teams will continue to contravene the Commission’s regulations.

PETA is prepared to assist the Commission in any way possible, including by providing additional evidence and guidance to assist your office in investigating participants at Texas bush tracks, including, but not limited to, 3 Amigos Race Track and Carril Santa Teresa, for apparent violations of Texas law.

Thank you for your attention to this important matter.

Respectfully,



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<sup>27</sup> See *Legislative Appropriations Request (2024-25)*, Texas Racing Commission, 22 (2022), [https://static1.squarespace.com/static/61f1f682f08bd15f1e6a2d9f/t/635703991c6c1d267b282e87/1666646940520/2022\\_10\\_24\\_TXRC\\_LAR+%28FY2024-25%29%28Updated%29.pdf](https://static1.squarespace.com/static/61f1f682f08bd15f1e6a2d9f/t/635703991c6c1d267b282e87/1666646940520/2022_10_24_TXRC_LAR+%28FY2024-25%29%28Updated%29.pdf); see also, Natalie Voss, ‘*They’re Going To Take Down All Of Racing’: Here’s Why Legitimate Tracks Should Be Concerned About The Bush Circuit*, Paulick Report (Mar. 21, 2023), <https://paulickreport.com/news/the-biz/theyre-going-to-take-down-all-of-racing-heres-why-legitimate-tracks-should-be-concerned-about-the-bush-circuit>.

<sup>28</sup> Carril Santa Teresa, Facebook (Mar. 31, 2024), [https://www.facebook.com/permalink.php?story\\_fbid=pfbid0RNjNdkwtGoikAcMeeiEV1AtRRCLYNtRF8FvrCXiQB5TKM1EHHfQt9R5sGAD2vq8vl&id=100076357321291](https://www.facebook.com/permalink.php?story_fbid=pfbid0RNjNdkwtGoikAcMeeiEV1AtRRCLYNtRF8FvrCXiQB5TKM1EHHfQt9R5sGAD2vq8vl&id=100076357321291). Another Facebook [post](#) by a person who films bush track races wishes good luck to three Colorado teams ahead of the April 6 event at Carril Santa Teresa in Amarillo.

<sup>29</sup> OJO De AGUA, Facebook (Apr. 3, 2024), <https://www.facebook.com/photo/?fbid=843198531173706&set=a.460874066072823>. Prior Carril Santa Teresa events promote similar races. For example, a [flyer](#) for the February 3, 2024, event includes two “Colorado vs Texas” races and another race that identifies the two teams as being from Colorado and Texas.

# Exhibit 1

<b>Unlicensed Track Name</b>	<b>Location</b>
1. 359 Training Center, aka Los Compadres Training Center	Laredo Ranchettes
2. Amaros Training Facility	Overton
3. Arriaga Training Center	Bellville
4. Big Spring Downs	Big Spring
5. Caballos Ligeros De Houston	Houston
6. Carril Acosta	Hereford
7. Carril Cuarto De Milla Oficial	Clint
8. Carril Cuatro Vientos/4 Vientos	Quemado
9. Carril De Cleveland	Cleveland
10. Carril El Coyote	Cleveland
11. Carril El Grande/El Grande Horse Training Facility	Dallas
12. Carril El Mezquite	Corsicana
13. Carril El Nuevo Coyote	Conroe
14. Carril El Ranchito Training Center	Tolar
15. Carril El Rodeo Downs	Perryton
16. Carril JCs Odessa Playground aka 3 Amigos Racetrack	Odessa
17. Carril La Herradura	Lubbock
18. Carril Los Dos Potrillos Training Center	Austin
19. Carril Los Pinos/Los Pinos Training Track	Farmersville
20. Carril Los Reyes	Muleshoe
21. Carril Mochomos	Levelland
22. Carril Murchison Downs	Murchison
23. Carril Ojo De Agua	Tyler
24. Carril Santa Teresa aka Carril San Carlos	Amarillo
25. Carril Tres Potrillos	Plainview
26. Carril Tres R	Ennis
27. CJ's Training Center	Atascosa
28. Darrington Park Training Facility	El Paso
29. El Arrimado Race Park	Monte Alto

30.	El Chuky Race Track	Rio Hondo
31.	El Mezquite Training Center	Laredo
32.	Herrerias Training Center	Crosby
33.	JR Race Track	Fort Stockton
34.	Karril El 4	Cleburne
35.	La Herradura Horse Training Center	Hamshire
36.	La Victoria Training Center	Cedar Creek
37.	My Texas Ranch Horse Training Center	Canton
38.	Perrett Training Center	Waller
39.	Plaza Waco	Waco
40.	Rancho 7 Leguas	Somerville
41.	Rancho El Texano	Princeton
42.	Rancho Los Pinos	Palestine
43.	Rancho M4	Muleshoe
44.	Silver Downs Training Center	Corpus Christi
45.	West Texas Race Track	Odessa
46.	Zarzamora Ranch	San Antonio