



July 21, 2022

The Honorable Jared Huffman, Chairperson
House Committee on Natural Resources
U.S. House of Representatives
Washington, D.C. 20515

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Dear Chairperson Huffman and all Members of the House Natural Resources Subcommittee on Water, Oceans, and Wildlife,

On behalf of our supporters, who represent a nationwide cross-section of citizens concerned about better protecting people, pets and wildlife from indiscriminate poisons, we are writing to express support for Canyon's Law, H.R. 4951, which was heard by your Subcommittee today. This bill is named after the Pocatello, Idaho teen, Canyon Mansfield, whose story is detailed below. It was also shared during today's hearing by Canyon's father, Dr. Mark Mansfield, who provided expert testimony.

Canyon's Law would prohibit the use of M-44 cyanide-dispersing devices, commonly referred to as "cyanide bombs," on public lands (see **Attachment 1**). This is a vital public safety concern, due to ongoing use of these deadly devices for predator control by USDA Wildlife Services and some state programs. M-44 use defies sound science and common sense for the simple reason that M-44s kill indiscriminately and cannot be safely deployed. In addition, they do not help resolve problems with predators.

The clamor for a ban has grown in all states where tragedy has struck. It comes from M-44 victims/survivors, physicians, veterinarians, scientists, law enforcement, and other affected parties. Several states have enacted restrictions on M-44 devices. An Oregon law banning M-44s statewide went into effect in 2020. Court victories have led to Colorado and Wyoming placing temporary restrictions that only allow M-44 use on private land; Arizona now prohibits M-44 use on public lands and none have been used on private lands in the last five years; and Idaho hasn't allowed M-44 use since 2017, pending the results of a new Environmental Impact Statement (EIS) in 2024.

Yet Wildlife Services and some state agencies have yet to acknowledge the reality of M-44 devices, which is:

There is no safe place or way to use M-44s, as young children, pets, and wild animals do not understand warning signs. There is virtually no place in the great outdoors that people and animals do not go. And it is only a matter of time before an M-44 kills a child. Meanwhile, science increasingly shows that lethal predator control is unnecessary and counter-productive.

M-44s Have a Devastating and Deadly Impact on People and Pets

In recent decades countless pets have been killed and people injured by M-44 "cyanide bombs," a name to which Wildlife Services objects. But the public started calling M-44s "cyanide bombs" because they act as such per common dictionary definitions. "Bombs" boil down to containers filled with a destructive substance designed to explode on impact or when triggered. M-44 devices are filled with powdery sodium cyanide poison. Their spring-activated ejectors spew the poison into the air in a cloud. The ejectors' force can spray the cyanide up to five feet. They are deadly devices, and to the public the definition of bomb fits.

A long list of known M-44 victims is included in **Appendix A**, which we encourage you to review. But we will highlight some of the most infamous reported incidents here, starting with the one that led to Canyon's Law (H.R. 4951).

Ongoing M-44 incidents came to a head in 2017 with the nationally publicized injury of a Pocatello, Idaho teen and the death of his dog. Fourteen-year-old Canyon Mansfield accidentally triggered an M-44 while walking on a hill behind his house with his three-year-old yellow Labrador retriever, Kasey. Canyon thought the device was a sprinkler head and reached down to examine it. It exploded in a powdery cloud and within minutes he watched his dog die an agonizing death in front of him. It appears Canyon was only spared death because of wind direction. He was hospitalized with severe side effects and continued to suffer long after the incident. The Pocatello tragedy dramatically showed how indiscriminate M-44s are in their lethal effects and the substantial risk they pose to humans and domestic animals.

In Oregon numerous M-44 incidents harmed humans and killed pets and native wildlife, prior to their 2020 statewide ban. In 1994, Amanda Wood Kingsley's dog was poisoned by an M-44 near Harrisburg, Oregon, and Kingsley suffered secondary poisoning from inhalation. In January 2000, an M-44 killed a German shepherd in Estacada, Oregon after Wildlife Services planted six of the devices on a tree farm frequented by local children. In February 2002, Danielle Clair of Philomath, Oregon lost her family dog to an M-44. Contrary to Wildlife Services' claims that M-44 victims always die quickly, Clair's dog did not. It died after eight agonizing hours in an emergency vet clinic. Another Oregon incident occurred in March 2017, when a collared wolf known as OR-48 was killed in Wallowa County by an M-44 on land designated as an Area of Known Wolf Activity.

In 2011 in Texas a Wildlife Services trapper was proven to have intentionally killed the Walker family's dog Bella with an M-44. He placed it 918 feet from their house, did not notify them, and grossly violated M-44 use restrictions.

Another older M-44 incident resurfaced in the news in 2018. Dennis Slaugh of Vernal, Utah had been poisoned by an M-44 in 2003 while recreating on public land. He sustained injuries of sufficient severity that he was permanently disabled. On February 24, 2018, Mr. Slaugh died. His death certificate listed cyanide poisoning from this M-44 incident as a contributing cause of death (see **Attachment 2**).

M-44s Kill Non-Target Wildlife Indiscriminately and Deaths Are Gravely Under-Reported

M-44s are baited with a scented lure to attract their victims, but they also attract and indiscriminately kill non-target wildlife, such as hawks, eagles, wolverines, lynx, and other native species.¹ Unsurprisingly, since 2000 Wildlife Services has killed countless animals representing more than 150 non-target species, including federally protected and/or state-protected animals such as Mexican gray wolves, grizzly bears, kangaroo rats, eagles, falcons, California condors, red-tailed hawks, great horned owls, and others.² In fact, Wildlife Services reported 246,985 animals killed by M-44s from 2000 through 2016, including at least 1,182 dogs.³ The number of non-target animals that have been killed by WS' M-44s is completely unacceptable given the ineffectiveness of this form of predator control, the availability of alternatives, and the ecological harm associated with haphazardly killing wildlife.

These incidents, though shocking, only reveal part of the problem. APHIS reports are often incomplete, notably missing data concerning deaths of domestic animals, pets and livestock known to have occurred during the reporting period. For example, while at least 1,200 pet dogs were killed by M-44s between 2000 and 2012,⁴ APHIS program data reports reflect no such deaths during those years. Moreover, the U.S. Fish and Wildlife Service (FWS) has noted that bird deaths are underreported because birds leave the vicinity of an M-44 device within a few seconds of triggering the

¹ Marks, C.A., and R. Wilson. 2005. Predicting mammalian target-specificity of the M-44 ejector in south-eastern Australia. *Wildl. Res.* 32: 151-156.

² Tom Knudson, *Suggestions in Changing Wildlife Services Range from New Practices to Outright Bans*, SACRAMENTO BEE (May 6, 2012).

³ USDA, Animal and Plant Health Inspection Service, "Wildlife Damage, Program Data Reports," https://www.aphis.usda.gov/aphis/ourfocus/wildlifedamage/SA_Reports/SA_PDRs.

⁴ Todd Wilkinson, *Dog's Death Spotlights Use of Cyanide 'Bombs' to Kill Predators*, NATIONAL GEOGRAPHIC (Apr. 20, 2017), available at <http://news.nationalgeographic.com/2017/04/wildlife-watch-wildlife-services-cyanide-idaho-predator-control/>.

ejector.⁵ APHIS also failed to report that, since 1987, at least 18 employees and several private citizens have been injured by M-44s.⁶

The Horrifying Effects of Sodium Cyanide, a Deadly Category 1 Toxin

Pursuant to the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), the Environmental Protection Agency (EPA) issued a Reregistration Eligibility Decision (RED) document for sodium cyanide in 1994 (case No. 3086). Their toxicity assessment identified sodium cyanide as “highly toxic to warm-blooded animals” and placed sodium cyanide in Toxicity Category I, indicating the greatest degree of acute toxicity, for oral, dermal and inhalation effects.⁷ In describing the effects on humans of short-term exposure to sodium cyanide, the Centers for Disease Control and Prevention states:

Early symptoms of cyanide poisoning include lightheadedness, giddiness, rapid breathing, nausea, vomiting (emesis), feeling of neck constriction and suffocation, confusion, restlessness, and anxiety. Accumulation of fluid in the lungs (pulmonary edema) may complicate severe intoxications. Rapid breathing is soon followed by respiratory depression/respiratory arrest (cessation of breathing). Severe cyanide poisonings progress to stupor, coma, muscle spasms (in which head, neck, and spine are arched backwards), convulsions (seizures), fixed and dilated pupils, and death.⁸

In the RED, the only registered use of sodium cyanide is a “single dose poison used in M-44 ejector devices on pastures, range and forest land.”⁹ To arm an M-44 ejector device, which has been described as resembling a sprinkler head,¹⁰ a certified applicator loads a sodium cyanide capsule into a capsule holder, which is then screwed onto the ejector mechanism.¹¹ “Any animal that is able to activate the trigger of the cyanide ejector device will get a dose of sodium cyanide in the mouth and die.”¹² Thus, the EPA identifies M-44 devices as a “high acute risk pesticide for terrestrial vertebrates, including nontarget and endangered birds.”¹³

M-44 Use Is Counterproductive and Pesticide Use Restrictions Are Ineffective

In addition to being indiscriminate, Wildlife Services’ and other state agencies’ predator killing programs are counterproductive. Nonselective, lethal “tools” like M-44s have not been shown to reduce losses of domestic sheep to predators, despite frequent reliance on such depredation as a justification for M-44 use.¹⁴ In some cases, predator killing programs actually result in *increased* livestock losses.¹⁵ Nor has any agency provided a rigorous cost-benefit

⁵ U.S. Department of Interior - Fish Wildlife Service. 1993. Biological Opinion: Effects of 16 Vertebrate Control Agents on Threatened and Endangered Species.

⁶ Tom Knudson, *Wildlife Services’ methods leave a trail of animal death*, SACRAMENTO BEE (Apr. 30, 2012), available at <http://www.idahostatesman.com/news/local/environment/article40733442.html>.

⁷ RED at 2.

⁸ Centers for Disease Control and Prevention, https://www.cdc.gov/niosh/ershdb/emergencyresponsecard_29750036.html (last visited May 20, 2018).

⁹ Environmental Protection Agency -Office of Prevention - Pesticides - and Toxic Substances. 1994. R.E.D. Facts: Sodium Cyanide, 1. (hereinafter “RED”).

¹⁰ Christina Corbin, *USDA Must Rethink Cyanide Bombs that Injured Boy, Killed Pets, Lawmaker Says*, Fox News USA (March 21, 2017), <http://www.foxnews.com/us/2017/03/21/usda-must-rethink-cyanide-bombs-that-injured-boy-killed-pets-lawmaker-says.html>.

¹¹ RED at 1.

¹² RED at 3.

¹³ *Id.*

¹⁴ Berger, K.M. 2006. Carnivore-livestock conflicts: Effects of subsidized predator control and economic correlates on the sheep industry. *Conserv. Biol.* 20: 751-761; Mitchell, B.R., M.M. Jaeger, and R.H. Barrett. 2004. Coyote depredation management: Current methods and research needs. *Wildl. Soc. Bull.* 32: 1209-1218.

¹⁵ Wielgus, R.B., and K.A. Peebles. 2014. Effects of wolf mortality on livestock depredations. *PLoSone*, <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0113505>; Peebles, K.A., R.B. Wielgus, B.T. Maletzke, and M.E. Swanson. 2013. Effects of remedial sport hunting on cougar complaints and livestock depredations. *PLoSone*.

analysis evaluating the cost of predator-killing programs—which is borne largely by taxpayers—relative to the value of livestock lost to predators occupying those carnivores’ native habitats.

An additional risk factor for people and pets is the lack of agency reporting on the number of devices deployed, locations, dates of placement, discharges of the devices, species killed, or accidental injuries and deaths to humans and domestic animals.

Also problematic is the fact that—despite the EPA’s publication of M-44 use restrictions—Wildlife Services often fails to comply with restricted use mandates, as demonstrated by the killings and injuries described throughout this petition.¹⁶ EPA’s pesticide use restrictions for M-44 cyanide capsules, include, but are not limited to:

8. The M-44 device *shall not be used*: (1) In areas within national forests or other Federal lands set aside for recreational use, (2) *areas where exposure to the public and family and pets is probable*, (3) in prairie dog towns, (4) except for the protection of federally designated threatened or endangered species, *in National and State Parks; National or State Monuments; federally designated wilderness areas and wildlife refuge areas.*
9. The M-44 device *shall not be used in areas where federally listed or threatened or endangered animal species might be adversely affected.*
23. Bilingual warning signs in English and Spanish *shall be used in all areas* containing M-44 devices.

Source: EPA Reg. No. 56228-15, Nov. 18, 1992 (emphasis added in italics above)

Wildlife Services regularly violates these use restrictions. In addition to repeatedly placing M-44s in areas where exposure to the public is probable, APHIS has been fined for illegally placing M-44 devices in national forests. Further, a U.S. District Court judge ordered Wildlife Services to stop using M-44 devices along the Green, Colorado, and San Juan Rivers because of the potential harm to California Condors, an endangered species, and the documented killing of a condor by an M-44 device.¹⁷ And yet, Wildlife Services continues to deploy M-44s.

But it is vitally important to note that, even if followed, use restrictions cannot adequately protect people, pets and wildlife, as young children and animals do not understand warning signs and there is essentially no place in the great outdoors that people and animals do not go.

To Ensure Safety for People, Pets and Wildlife, M-44s Need to Be Eliminated on Public Lands

Given the hazards M-44s pose to people, pets, and native wildlife, the strong public sentiment against them, and the questionable economic and scientific benefits of such programs, we believe that continued use of M-44 on public lands by Wildlife Services and state agencies is unjustifiable and runs counter to the public interest. Our government should not be turning public lands into potentially deadly minefields for people, pets and wildlife. Too many deaths have already occurred and M-44s must be eliminated before a child is killed. This is a nonpartisan, public safety issue.

We hereby request that the House Natural Resources Subcommittee on Water, Oceans, and Wildlife support Canyon’s Law (H.R. 4951) to prohibit the use of M-44 cyanide devices on public lands.

Respectfully,



Brooks Fahy
Executive Director
Predator Defense

<http://dx.doi.org/10.1371/journal.pone.0079713>.

¹⁶ See also Appendix A and B.

¹⁷ See *San Juan Audubon Society v. Veneman*, 153 F. Supp. 2d 1 (D.D.C. 2001).

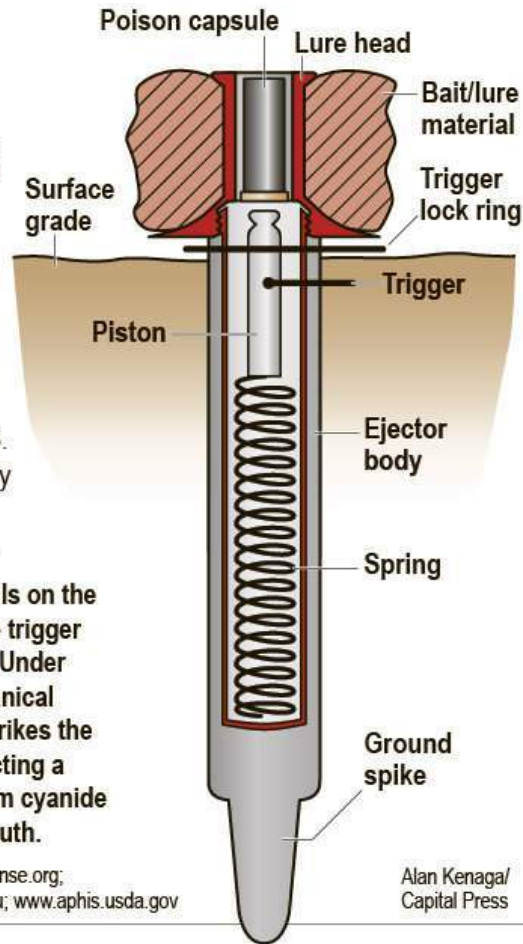
ATTACHMENT 1 – Diagram of M-44 Sodium Cyanide Device

M-44 Cyanide Traps

M-44-style traps, also known as Canid pest ejectors, or CPEs, were first developed in the U.S. in the 1930s as a way to autonomously control pest species.

When the animal pulls on the baited lure head, the trigger releases the piston. Under pressure of a mechanical spring, the piston strikes the poison capsule, ejecting a lethal dose of sodium cyanide into the animal's mouth.

Sources: www.predatordefense.org;
www.smithandgeorg.com.au; www.aphis.usda.gov



Alan Kenaga/
Capital Press

ATTACHMENT 2 - Death Certificate for Dennis Slaugh, M-44 Poisoning Victim

STATE OF UTAH
CERTIFICATION OF VITAL RECORD

CERTIFICATE OF DEATH
State File Number: 2018002960
Dennis Ray Slaugh

DECEDENT INFORMATION

Date of Death:	February 24, 2018	Time of Death:	11:05
City of Death:	Murray	County of Death:	Salt Lake
Age:	75	Date of Birth:	September 1, 1942
Place of Birth:	Vernal, Utah	Sex:	Male
Armed Services:	No	Marital Status:	Married
Spouse's Name:	Dorothy Lorraine Hullinger	Usual Occupation:	Heavy Equipment Operator
Industry/Business:	Uintah County	Education:	Associate Degree
Residence:	Vernal, Utah	Parent or Father:	Mervin Jay Slaugh
Parent or Mother:	Mary Emily Bowden	Facility Type:	Hospital Inpatient
Facility or Address:	Intermountain Medical Center		

INFORMANT INFORMATION

Name:	Dorothy Lorraine Slaugh	Relationship:	Wife
Mailing Address:	4483 North Dryfork Canyon Rd, Vernal, Utah 84078		

DISPOSITION INFORMATION

Method of Disposition:	Cremation
Place of Disposition:	Basin Cremation Center Inc, Vernal, Utah
Date of Disposition:	March 2, 2018

FUNERAL HOME INFORMATION

Funeral Home:	Ashley Valley Funeral Home
Address:	410 North 800 West, , Vernal, Utah 84078
Funeral Director:	Jacob Phillips

MEDICAL CERTIFICATION

Medical Professional:	Eric Anding MD, 5121 South Cottonwood Street, Murray (Salt Lake), Utah 84107
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CAUSE OF DEATH

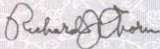
Acute Myocardial Infarction					
Due to (or as a consequence of):	Coronary Artery Disease				
Other significant conditions:	Cyanide Poisoning / Exposure From M44 Device 2003				
Tobacco Use:	Non-user				
Medical Examiner Contacted:	Yes	Autopsy Performed:	No	Manner of Death:	Natural

Date Registered: February 27, 2018
Date Issued: May 11, 2018

AMENDMENT HISTORY

02/27/2018	Spouse Last Name from Slaugh to Hullinger
03/06/2018	Decedent Date of Birth from 01/01/1942 to 09/01/1942
05/10/2018	Conditions Contributing to Death from Cyanide Poisoning / Exposure from M44 Device 2002 to Cyanide Poisoning / Exposure From M44 Device 2003

This is an exact reproduction of the facts registered in the Utah State Office of Vital Records and Statistics. Security features of this official document include: High Resolution Border, V & R Images in top cycloids, and microtext. This document displays the date, seal, and signature of the Utah State Registrar of Vital Records and Statistics.

 Richard J. Oborn, MPA State Registrar Rev. 1/16	 066038886	 Jordan D. Mathis Director/ Health Officer TriCounty Health Department
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ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE

APPENDIX A - Featured Incidents of Pet Killings and Human Poisonings Caused by M-44 Cyanide Devices

Compiled by Predator Defense, <https://www.predatordefense.org/m44s.htm>

NOTE: The list below highlights just a few of the documented incidents of people and domestic animals injured or killed by the M-44 cyanide devices used by USDA Wildlife Services. It was compiled from agency documents, news reports, and various other sources. The real M-44 body count is estimated to be in the thousands, far exceeding the numbers officially reported by Wildlife Services in their yearly Program Data Reports. We say this because whistleblowers from Wildlife Services have consistently stated that many dogs just go missing and families are left to wonder what happened to them. Additionally, unless someone other than a federal agent is there to witness the poisoning, the agents often do not record them. So countless dog deaths go unreported and will never be known.

February 2018: Dennis Slaugh of Vernal, Utah, dies. Slaugh was poisoned by an M-44 in 2003, and his death certificate listed cyanide poisoning from M-44 as a contributing cause (see [death certificate](#)).

March 2017: A dog and a 14-year-old boy triggered an M-44 in Idaho. The boy, along with several emergency personnel, were exposed to cyanide. The boy suffered long-term, adverse health effects. His dog died in front of him. Were it not for wind direction, the boy might also have died. No warning signs were posted.ⁱ

March 2017: Two dogs were killed in Wyoming by an M-44 during a walk with their family.ⁱⁱ

February 2011: An M-44 was placed 918 feet from a residence in Texas without the family's knowledge, killing their dog and violating three EPA use restrictions.^{iii,iv}

February 2010: A dog was killed in Nebraska by an M-44 set by Wildlife Services on the dog owner's rangeland/pasture.^v

April 2010: A dog wearing collar and tags was killed in W. Virginia by an M-44 set on neighboring land. The Wildlife Services agent buried her without notifying the family.^{vi}

January 2008: A dog was killed by an M-44 in N. Dakota.^{vii}

January 2008: A man in Texas was injured by an M-44 placed without his knowledge on grazing land.

February 2008: A beagle was killed by an M-44 in Virginia.^{viii}

February 2008: A dog was killed by an M-44 in New Mexico.^{ix}

April 2008: A dog in N. Dakota was killed by an M-44 set on rangeland/pasture.^x

June 2008: A pit bull was killed in Virginia by an M-44 in a livestock pasture/hayfield.^{xi}

January 2007: A dog was killed by an M-44 in North Dakota.^{xii}

March 2007: A Border collie was killed by an M-44 in Virginia.^{xiii}

April 2007: A Border collie puppy was killed by an M-44 in Virginia.^{xiv,xv}

May 2007: A worker in Texas accidentally triggered an M-44. The cyanide was ejected into the man's eyes and he

subsequently experienced burning and irritated eyes as well as disorientation.^{xvi, xvii}

June 2007: A Great Pyrenees was killed by an M-44 in New Mexico.^{xviii}

January 2006: A Golden retriever was killed by an M-44 in Virginia.^{xix, xx}

February 2006: A Labrador retriever was killed in Utah when she triggered an M-44 set a foot from a road.^{xxi}

April 2006: A young German shepherd was killed when he triggered an M-44 on public land in Utah.^{xxii, xxiii}

March 2005: An Australian Shepherd was killed in New Mexico by an M-44 set by Wildlife Services on rangeland.^{xxiv}

March 2005: A dog was killed in New Mexico by an M-44 set by Wildlife Services on ranch land.^{xxv}

April 2005: A Border collie in New Mexico was killed by an M-44 set on the owner's ranch property.^{xxvi, xxvii}

December 2005: A certified therapy dog who worked with at-risk youth was killed in front of a girl's group by an M-44 set 10 feet from a public road.^{xxviii, xxix}

January 2004: A dog was killed by an M-44 set by Wildlife Services in New Mexico on the ranch of the dog owner's relative.^{xxx}

February 2004: An Irish setter was likely killed by an M-44 in Virginia.^{xxxi}

March 2004: A dog in Idaho was found dead within 200 yards of an M-44 set by Wildlife Services in a nearby sheep pasture.^{xxxii, xxxiii}

March 2004: A German shepherd was killed by an M-44 in New Mexico.^{xxxiv}

May 2003: Dennis Slauch was poisoned and permanently disabled when he triggered an M-44 on public land in Utah. He was forced to retire from his job.^{xxxv}

January 2002: A rancher in Nebraska was injured by the accidental discharge of an M-44 that had been set by Wildlife Services on his property.^{xxxvi}

February 2002: A dog was killed by an M-44 set by Wildlife Services.^{xxxvii}

February 2002: A Labrador retriever was killed in Virginia by an M-44 set by Wildlife Services on a neighbor's cattle pasture.^{xxxviii}

February 2002: A dog was killed in New Mexico by an M-44 set by Wildlife Services on rangeland/pasture.^{xxxix}

February 2002: A dog triggered an M-44 in Oregon placed on a neighboring ranch by Wildlife Services.^{xl}

February 2002: A dog was killed by an M-44 set by Wildlife Services.^{xli}

February 2002: A dog was killed by an M-44 set by Wildlife Services on the farm of the dog owner's relative.^{xlii}

February 2002: A dog in Oregon took 8 hours to die after exposure to an M-44 set on property next door to her home and without her knowledge. During a subsequent investigation WS requested that Oregon authorities "consider the info provided during the investigation be confidential *and not disclosed as public record* [emphasis added]." WS also refused to

release a copy of the incident report to the dog's owner.^{xliii, xliv, xlv}

April 2002: A dog was killed by an M-44 set by Wildlife Services on a neighboring farm in Virginia.^{xlvi}

June 2002: A black Angus cow was killed in West Virginia by an M-44 set by Wildlife Services in a pasture.^{xlvii}

November 2002: A woman was injured after trying to remove an M-44 set by Wildlife Services on her neighbor's property.^{xlviii}

May 2001: A dog in Colorado was killed by an M-44 set by Wildlife Services on a neighboring ranch "outside the provisions authorized by state law".^{xlix}

April 2001: A dog in Nebraska was killed by an M-44 set by Wildlife Services on rangeland/pasture.^l

January 2000: A dog in Oregon was killed after triggering an M-44 set 100 yards from the owner's home. The device was one of six that had been planted in a tree farm frequented by local children.^{li, lii, liii}

February 2000: A dog in New Mexico activated an M-44 set on rangeland/pasture by Wildlife Services.^{liv}

March 2000: A dog in Colorado was killed by an M-44 set on private property without the knowledge of the owners. The family, including a three-year-old girl, watched as the dog suffered and died. A state investigation found that Wildlife Services had not only trespassed, but broken a suite of federal rules regulating M-44s.^{lv}

May 2000: A Border collie in West Virginia was killed by an M-44 set by Wildlife Services in a sheep pasture.^{lvi}

September 2000: A county surveyor in Utah discharged an M-44 after mistaking it for a survey marker.^{lvii}

March 1999: A man and his three-year old daughter were walking with their dog on their property in Colorado when it triggered an M-44 and later died. A WS staffer had placed two traps on their land, trespassing and breaking a suite of federal rules.^{lviii}

April 1999: A dog was killed in Virginia when he triggered an M-44 set by Wildlife Services on a neighboring farm. The owner also found another dog's body at the device. A third dog also encountered an M-44 and returned home with red and swollen eyes as well as a swollen mouth and a peculiar odor. The owner himself likely experienced secondary poisoning.^{lix, lx}

August 1999: An individual helping a Wildlife Services employee look for and remove M-44s accidentally fired one of the devices.^{lxi}

September 1999: A hunting dog was killed in Virginia by an M-44 set by Wildlife Services. M-44s were not permitted for use in that state from September 1 to January 7, but the Wildlife Services employee had failed to remove them.^{lxii}

September 1999: A dog was killed in Oregon by an M-44 set by Wildlife Services.^{lxiii}

October 1999: A Wildlife Services employee in Texas accidentally discharged an M-44 as he was setting it. He had to be airlifted to a facility for treatment.^{lxiv}

October 1999: A dog was killed in Utah by an M-44 set by Wildlife Services.^{lxv}

December 1999: Two dogs were killed by M-44s during a hunting trip in New Mexico on state lands.^{lxvi}

December 1999: A citizen in Nebraska accidentally discharged an M-44 as he attempted to move it with a pair of pliers while he was repairing fence wire.^{lxvii}

February 1998: A dog in Utah was killed by an M-44 set by Wildlife Services on BLM land that adjoined the owner's private yard. No one was notified about Wildlife Services' activities.^{lxviii, lxi, lxx}

November 1998: A man in Texas, working on private land, was injured when he grabbed what he thought was a rusted metal rod to pull it from the ground and an M-44 exploded in his hand.^{lxxi}

December 1998: A dog was killed in Oregon by an M-44 set by Wildlife Services.^{lxxii}

April 1995: A hunter in Idaho accidentally discharged an M-44 that had been set by Wildlife Services.^{lxxiii}

Fall 1994: A dog in Oregon was walking with its family when it triggered an M-44 set on the property without their knowledge. The owner, not knowing why her dog was in respiratory distress, attempted to help it and suffered secondary cyanide poisoning from inhalation. The dog suffered for 15 minutes before dying.^{lxxiv}

August 1993: Two bow hunters in Utah pulled M-44s set by Wildlife Services.^{lxxv}

April 1990: A dog in New Mexico accompanying a ranch hand triggered an M-44. After attempting mouth-to-mouth resuscitation on the dog, who died within a few minutes, the man quickly experienced loss of breath, a swollen tongue, a fast heart rate, numb lips, and curling fingers on one hand. He was transported to a hospital where he was treated and placed in intensive care.^{lxxvi}

ⁱIdaho State Journal David Ashbury March 16 2017 Pocatello boy watches family dog die after cyanide bomb explodes. http://idahostatejournal.com/news/local/pocatello-boy-watches-family-dog-die-after-cyanide-bomb-explodes/article_d0003a2f-6b7f-5d31-b427-68db03d3b93a.html

ⁱⁱhttp://www.predatordefense.org/features/m44_WY_Amy_dogs.htm

ⁱⁱⁱPredator Defense, http://www.predatordefense.org/m44s_bella.htm

^{iv}Tom Knudson, "Efforts to investigate Wildlife Services' methods continue," The Sacramento Bee, June 25, 2012.

^vUSDA-APHIS-WS, Adverse Effects Incident Information Report.

^{vi}Letter from James R. Gardner to Commissioner Gus Douglas, West Virginia State Department of Agriculture, April 21, 2010.

^{vii}USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{viii}USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{ix}USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^xUSDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{xi}USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{xii}USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{xiii}USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{xiv}USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{xv}USDA-APHIS-WS, Report of Injury or Death of Non-target Animal.

- ^{xvi}USDA-APHIS-WS, Adverse Effects Incident Information Report and Human Incident Supplemental Report
- ^{xvii}Brazoria County Sheriff Incident/Offense Report, 22 May 2007.
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