

EXHIBIT 4

DECLARATION OF JOANNE PAVLIS

I, Joanne Pavlis, declare as follows:

1. I am a professional horse trainer with Milemakers, LLC of Larkspur, Colorado. I have personal knowledge of the facts set forth in this declaration. The facts set forth are true to the best of my knowledge and recollection.

2. Milemakers LLC provides training for horses and specializes in the education, training and condition of Endurance and Pleasures Distance horses and riders. We also provide conditioning for Arabian race horses who will be used on the racetrack, a beginning program for junior riders, and coaching for trail rides.

3. I have been training horses for eighteen years and have worked as a trainer with Milemakers for the last sixteen years. In the course of my work I have seen hundreds of horses, gotten to know hundreds of their owners, and am familiar with the drugs, treatments and substances used by owners of companion horses, sporting and competitive horses, and horses destined for racing.

4. I have reviewed Exhibit A to the Petition for Rulemaking being submitted by Front Range Equine Rescue. I am familiar with virtually all the drugs, treatments and substances listed on Exhibit A.

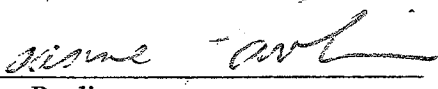
5. The drugs, treatments and substances listed on Exhibit A are all very commonly used by owners of companion horses and competition horses. Virtually all such owners would either have these drugs, treatments and substances on hand and use them on their horses, or would have access to the drugs treatments and substances, and be able to easily get them from their local veterinarian.

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6. I am also familiar with and have had experience with wild horses who have been captured and placed in holding pens. These horses are given some of the drugs, substances and treatments on Exhibit A, including many commonly-used veterinary drugs.

I declare under penalty of perjury that the foregoing is true and correct, based on my own personal knowledge and experience.

Executed this 19 day of March, 2012, in Larkspur, Colorado.



Joanne Pavlis