

**IN THE CIRCUIT COURT OF HICKORY COUNTY, MISSOURI**

<b>STATE OF MISSOURI, ex. rel.</b>	)	
<b>Eric Schmitt, Attorney General of</b>	)	
<b>Missouri, and</b>	)	
<b>Chris Chinn, Director of the</b>	)	
<b>Missouri Department of Agriculture</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. _____</b>
	)	
<b>LAURIE LUND, d/b/a</b>	)	
<b>Cridder Creek Kennel,</b>	)	
	)	
<b>Defendant.</b>	)	

**Please serve:**

**Laurie Lund  
25761 County Road 415  
Urbana, Missouri 65767**

**VERIFIED PETITION FOR TEMPORARY RESTRAINING ORDER,  
PRELIMINARY AND PERMANENT INJUNCTION, AND CIVIL PENALTIES  
UNDER SECTIONS 273.325 TO 273.357 RSMO**

COMES NOW, the State of Missouri, at the relation of Attorney General, Eric Schmitt and the Director of the Missouri Department of Agriculture, Chris Chinn, for its cause of action against Defendant, Laurie Lund d/b/a Cridder Creek Kennel, and state as follows:

**Introduction**

Laurie Lund (“Lund”) is an unlicensed commercial dog breeder doing business as Cridder Creek Kennel in Weaubleau, Hickory County, Missouri. Lund’s commercial breeder license expired on January 31, 2021, yet Lund continues to

operate without a license. As of April 1, 2021, Lund had 103 dogs in her inventory, 23 of which were puppies. Lund continues to unlawfully sell puppies and breed dogs to continue producing puppies. What's more, Lund's inspection record exhibits a perpetual disregard for the welfare of the animals in Lund's care. Since June 4, 2020, the Missouri Department of Agriculture has undertaken eight inspections of Lund's facility and noted approximately 60 violations of the Animal Care Facilities Act and Canine Cruelty Prevention Act, including several repeat violations that Lund failed to correct or otherwise address, including unsanitary facilities with an accumulation of dirt, grime, dog hair, and waste material; inadequate outdoor shelter lacking protection from the elements; failure to keep and maintain disposition records and medical records; and failure to provide adequate veterinary care. Furthermore, on several occasions, and since May 18, 2021, Lund has failed to make her facilities and animals available for inspection during normal business hours. For these reasons, the State seeks a temporary restraining order, preliminary and permanent injunction, and civil penalties to prevent continuing and future violations of the Animal Care Facilities Act and Canine Cruelty Prevention Act.

### **Parties**

1. Eric Schmitt is the duly elected, qualified, and acting Attorney General of the State of Missouri. The Attorney General is authorized under Section 27.060 RSMo to institute, in the name and on behalf of the State, all civil proceedings at law or in equity necessary to protect the rights and interests of the State.

2. Chris Chinn is the duly appointed Director of the Missouri Department of Agriculture (“Department”) and is responsible for the enforcement of the Animal Care Facilities Act Sections 273.325–273.357 RSMo (“ACFA”), Canine Cruelty Prevention Act Section 273.345 RSMo (“CCPA”), and the regulations promulgated thereunder.

3. This Petition refers to Attorney General Eric Schmitt and Director of the Department collectively as “the State” unless specifically designated otherwise.

4. Defendant, Laurie Lund (“Lund” and “Defendant”), is a commercial dog breeder doing business as Cridder Creek Kennel (“Facility”), with its principal place of business located at 14742 US Highway 54, Weaubleau, Hickory County, Missouri. Defendant owns and operates a kennel which houses more than three intact female dogs for the primary purpose of breeding animals for sale. Defendant is also operating under the alias Laurie Joyce.

### **Venue and Jurisdiction**

5. This suit concerns Lund’s violations of the ACFA and the CCPA occurring at Lund’s Facility within the confines of Hickory County, Missouri. This Court has jurisdiction over the subject matter and the parties in this action, and venue is proper pursuant to Section 273.347.1 RSMo.

### **Allegations Common to All Counts**

6. Section 273.347.1 RSMo authorizes the Attorney General to bring an action in circuit court for a temporary restraining order, preliminary injunction, and permanent injunction whenever an “animal welfare official” finds past violations of

the ACFA have occurred and have not been corrected or addressed, including operating without a valid license. In addition, the circuit court may assess a civil penalty in an amount not to exceed one thousand dollars for each violation, and each violation shall constitute a separate offense. *Id.*

7. “Animal welfare official” is defined as “any licensed veterinarian, designated by and under the supervision of the state veterinarian, who administers or assists in the administration of the provisions of [the ACFA and CCPA], or any appointee of the director, and shall include all deputy state veterinarians[.]”

8. The ACFA defines “commercial breeder” as a “person, other than a hobby or show breeder, engaged in the business of breeding animals for sale or for exchange in return for a consideration, and who harbors more than three intact females for the primary purpose of breeding animals for sale.” Section 273.325.2(8), RSMo.

9. Lund is a commercial breeder within the meaning of the ACFA because she possessed commercial breeder license no. AC002MGK issued by the Department under the ACFA, which expired on January 31, 2021.

10. Lund is further subject to the requirements of the ACFA because Lund owns and operates a kennel, which houses more than three intact female dogs for the primary purpose of breeding animals for sale. As such, Lund meets the definition of a “commercial breeder” in Section 273.325.2(8) RSMo.

11. In addition, Lund is subject to the CCPA because she meets the definition of a “person” who has “more than ten female covered dogs” under Section 273.345 RSMo.

12. Lund’s commercial breeder license no. AC002MGK expired on January 31, 2021, and Lund has not applied to renew her license for 2021, yet Lund continues to operate as a commercial breeder.

13. The previous paragraphs are incorporated by reference into each of the following counts as though set forth fully below.

**COUNT I**  
**Operating Without an ACFA License**

14. Section 273.327 RSMo prohibits any person from conducting any ACFA regulated activity until such person has obtained an ACFA license issued by the Director of the Department.

15. ACFA Regulation 2 CSR 30-9.020(1)(P) requires operators whose licenses automatically lapse to not conduct any activity for which a license is required by ACFA until all requirements for issuing a license have been met, and a valid license has been issued.

16. Lund possessed commercial breeder license no. AC002MGK issued by the Department under the ACFA, which expired on January 31, 2021.

17. Before Lund’s license expired, on December 2, 2020, animal welfare officials notified Lund of the need to renew her commercial breeder license by January 31, 2021.

18. On February 4, 2021 and April 1, 2021, animal welfare officials notified Lund that she was deficient for failing to renew her license, and informed Lund she must refrain from conducting any business until she was issued a license.

19. Lund has not renewed or applied for renewal of her commercial breeder license.

20. Since January 31, 2021, Lund has harbored more than three intact female dogs for the primary purpose of breeding animals for sale.

21. Since January 31, 2021, Lund has unlawfully sold puppies, and she continues to breed dogs to continue producing puppies for sale.

22. Since January 31, 2021, Lund has violated Section 273.327 RSMo and 2 CSR 30-9.020(1)(P) by continuing to engage as a commercial breeder without a valid license.

23. The State seeks a temporary restraining order, preliminary and permanent injunction, and a \$1,000.00 civil penalty to prevent continuing and future violations of the ACFA and CCPA.

## **COUNT II**

### **June 4, 2020 Uncorrected Health and Husbandry Violation**

24. ACFA Regulation 2 CSR 30-9.030(2)(A)3 prohibits puppies four months of age or less from being housed in the same primary enclosure with adult dogs other than their dams or foster dams.

25. Lund violated Regulation 2 CSR 30-9.030(2)(A)3 on June 4, 2020 by housing a six week old Great Pyrenees puppy in an enclosure with five adult mini poodles.

26. Animal welfare officials from the Department notified Lund of the violation during an inspection of Lund's Facility on June 4, 2020, and instructed Lund to correct this violation by removing the Great Pyrenees puppy from the enclosure or moving the poodles to a separate enclosure.

27. On June 10, 2020, animal welfare officials from the Department undertook a re-inspection of Lund's Facility and identified that the Great Pyrenees puppy was still being housed in an enclosure with the adult poodles.

28. Lund failed to correct the violation.

29. The State seeks a temporary restraining order, preliminary and permanent injunction, and a \$1,000.00 civil penalty based on Lund failing to correct the past violation as authorized under Section 273.347.1 RSMo.

**COUNT III**  
**June 4, 2020 Uncorrected Health and Husbandry Violation**

30. In order to protect animals from injury, and to reduce or eliminate breeding and living areas from rodents and other pests and vermin, ACFA Regulation 2 CSR 30-9.030(2)(E)3 requires Lund to keep her premises free of accumulation of trash, junk, waste products, and discarded matter, and to control weeds, grasses, and bushes so as to facilitate cleaning of the premises and pest control and to protect the health and well-being of the animals.

31. Lund violated Regulation 2 CSR 30-9.030(2)(E)3 on June 4, 2020 by allowing several enclosures to get overgrown with weeds approximately 24-36 inches tall.

32. Animal welfare officials from the Department notified Lund of the violation during an inspection of Lund's Facility on June 4, 2020, and instructed Lund to correct this violation by controlling the weeds in the enclosures.

33. On June 10, 2020, animal welfare officials from the Department undertook a re-inspection of Lund's Facility and identified several enclosures with overgrown weeds, and notified Lund that she had until June 11, 2020 to correct the violation.

34. On July 23, 2020, animal welfare officials from the Department attempted to conduct an inspection of Lund's Facility, and Lund refused to allow an inspection, preventing the Department from assessing the status of the violation.

35. The animal welfare officials notified Lund that she would be given a violation for refusing the inspection and her previous violations would be elevated resulting in a \$100 fine. Lund stated she was fine with the \$100 fine because she was selling a puppy for \$2,200.

36. On August 4, 2020, animal welfare officials from the Department undertook a re-inspection of Lund's Facility and identified several enclosures that still had overgrown weeds.

37. On October 7, 2020, animal welfare officials from the Department undertook a re-inspection of Lund's Facility and identified weeds approximately 24 inches tall in the back perimeter of an enclosure housing Collies.

38. Lund failed to correct this violation.

39. The State seeks a temporary restraining order, preliminary and permanent injunction, and a \$1,000.00 civil penalty based on Lund failing to correct the past violation as authorized under Section 273.347.1 RSMo.

**COUNT IV**  
**August 4, 2020 Uncorrected Surface and Cleaning Violation**

40. In order to prevent accumulation of excreta and reduce disease hazards, ACFA Regulation 2 CSR 30-9.030(1)(A)3.C requires Lund to conduct daily spot cleaning and sanitization of hard surfaces which animals come in contact with.

41. Lund violated Regulation 2 CSR 30-9.030(1)(A)3.C on August 4, 2020 by allowing a dog house being used by an Australian Shepherd and Standard Collie to accumulate a buildup of dirt and grime.

42. Animal welfare officials from the Department notified Lund of the violation during an inspection of Lund's Facility on August 4, 2020, and instructed Lund to correct this violation by cleaning and sanitizing all dog houses to satisfy general husbandry standards.

43. On October 7, 2020, animal welfare officials from the Department undertook a re-inspection of Lund's Facility and identified a buildup of dirt and grime around several doggie doors attached to the kennel building, and again instructed Lund to ensure all hard surfaces that come into contact with the animals are cleaned and sanitized.

44. On December 2, 2020, animal welfare officials from the Department undertook a re-inspection of Lund's Facility and identified that the doggie doors still

had a buildup of dirt and grime, as did the dog feeder in the pen housing the Keeshonds.

45. Lund failed to correct the violation.

46. The State seeks a temporary restraining order, preliminary and permanent injunction, and a \$1,000.00 civil penalty based on Lund failing to correct the past violation as authorized under Section 273.347.1 RSMo.

**COUNT V**  
**August 4, 2020 Uncorrected Primary Enclosure Violation**

47. ACFA Regulation 2 CSR 30-9.030(1)(F)1.B(IX) establishes minimum standards for primary enclosures used to house animals, and requires Lund to construct and maintain primary enclosures so that they enable all surfaces in contact with animals to be readily cleaned and sanitized, or to replace such surfaces when worn or soiled.

48. Lund violated Regulation 2 CSR 30-9.030(1)(F)1.B(IX) on August 4, 2020 by failing to repair, seal, or replace absorbent wood that had been excessively chewed near the doors of several pens.

49. Animal welfare officials from the Department notified Lund of the violation during an inspection of Lund's Facility on August 4, 2020, and instructed Lund to correct this violation by repairing, sealing, or replacing the chewed edges so that all surfaces in contact with animals were able to be cleaned and sanitized.

50. On October 7, 2020, animal welfare officials from the Department undertook a re-inspection of Lund's Facility and identified that several pens still had absorbent wood that had been excessively chewed and scratched.

51. On December 2, 2020, animal welfare officials from the Department undertook a re-inspection of Lund's Facility and still observed absorbent wood in an open pen housing three Australian Shepherds that had been excessively chewed and scratched.

52. Lund failed to correct the violation.

53. The State seeks a temporary restraining order, preliminary and permanent injunction, and a \$1,000.00 civil penalty based on Lund failing to correct the past violation as authorized under Section 273.347.1 RSMo.

**COUNT VI**  
**August 4, 2020 Uncorrected Identification Violation**

54. ACFA Regulation 2 CSR 30-9.020(9)(C) establishes minimum standards for identification and requires Lund to maintain official identification for all animals at the time of acquisition, or in the case of puppies, when weaned or separated from their mother.

55. Lund violated Regulation 2 CSR 30-9.020(9)(C) on August 4, 2020 by harboring 18 unidentified weaned puppies.

56. Animal welfare officials from the Department notified Lund of the violation during an inspection of Lund's Facility on August 4, 2020, and instructed Lund to correct this violation by officially identifying the 18 puppies. Lund was instructed to identify all puppies once weaned going forward.

57. On October 7, 2020, animal welfare officials from the Department undertook a re-inspection of Lund's Facility and identified three different litters of

weaned puppies being housed in one enclosure, with three of the puppies lacking any form of identification.

58. On December 2, 2020, animal welfare officials from the Department undertook a re-inspection of Lund's Facility and again observed a litter of weaned black Poodle puppies that did not have any form of identification.

59. Lund failed to correct the violation.

60. The State seeks a temporary restraining order, preliminary and permanent injunction, and a \$1,000.00 civil penalty based on Lund failing to correct the past violation as authorized under Section 273.347.1 RSMo.

**COUNT VII**  
**August 4, 2020 Uncorrected Recordkeeping Violation**

61. ACFA Regulation 2 CSR 30-9.020(10)(A)1.E establishes minimum standards for records and requires Lund to make, keep, and maintain complete and accurate records for all animals, including the date the animal was acquired and disposed of, and the method of disposition, including by death or euthanasia.

62. Lund violated Regulation 2 CSR 30-9.020(10)(A)1.E on August 4, 2020 by failing to document the disposition of approximately ten puppies.

63. Animal welfare officials from the Department notified Lund of the violation during an inspection of Lund's Facility on August 4, 2020, and instructed Lund to correct this violation by recording the disposition date of all animals.

64. On October 7, 2020, animal welfare officials from the Department undertook a re-inspection of Lund's Facility and identified that two puppies from

two separate litters had died in the last 48 hours and Lund failed to record their deaths.

65. On December 2, 2020, animal welfare officials from the Department undertook a re-inspection of Lund's Facility and again observed that Lund failed to document the deaths of two puppies from separate litters.

66. On February 4, 2021, animal welfare officials from the Department undertook a routine inspection of Lund's Facility and Lund was unable or unwilling to allow Department officials to examine disposition records during the inspection.

67. On April 1, 2021, animal welfare officials from the Department undertook a re-inspection of Lund's Facility and Lund again was unable or unwilling to allow Department officials to examine disposition records during the inspection.

68. Lund failed to correct the violation.

69. The State seeks a temporary restraining order, preliminary and permanent injunction, and a \$1,000.00 civil penalty based on Lund failing to correct the past violation as authorized under Section 273.347.1 RSMo.

**COUNT VIII**  
**October 7, 2020 Uncorrected Outdoor Facilities Violation**

70. ACFA Regulation 2 CSR 30-9.030(1)(D)2 requires Lund to adhere to minimum standards for outdoor facilities and states that outdoor facilities must include one or more shelter structures that are accessible to each animal in the outdoor facility, and such structures must contain a roof, four sides and a floor, and must be provided with a wind break and rain break at the entrance to protect the animals from the elements.

71. Lund violated Regulation 2 CSR 30-9.030(1)(D)2 on October 7, 2020 by failing to provide wind and rain breaks on several outdoor dog houses.

72. Animal welfare officials from the Department notified Lund of the violation during an inspection of Lund's Facility on October 7, 2020, and instructed Lund to correct this violation by adding a wind and rain break at the entrance of all outdoor dog houses.

73. On December 2, 2020, animal welfare officials from the Department undertook a re-inspection of Lund's Facility and observed that Lund failed to add wind and rain breaks to the outdoor dog houses as instructed.

74. On February 4, 2021, animal welfare officials from the Department undertook a routine inspection of Lund's Facility and again observed several outdoor dog houses without wind and rain breaks at the entrances.

75. On April 1, 2021, animal welfare officials from the Department undertook a re-inspection of Lund's Facility and again observed several outdoor dog houses which lacked adequate wind and rain breaks at the entrances.

76. Lund failed to correct the violation.

77. The State seeks a temporary restraining order, preliminary and permanent injunction, and a \$1,000.00 civil penalty based on Lund failing to correct the past violation as authorized under Section 273.347.1 RSMo.

**COUNT IX**  
**October 7, 2020 Uncorrected Recordkeeping Violation**

78. ACFA Regulation 2 CSR 30-9.020(10)(A)2 establishes minimum standards for medical records and requires Lund to maintain individual medical

records for all animals, which shall specify all treatments and all medications given and all procedures performed on the animal, including the reason for or the condition requiring treatment, medication, or procedure.

79. Lund violated Regulation 2 CSR 30-9.020(10)(A)2 on October 7, 2020 by failing to document the medication administration of Albon, metronidazole, Pyrantel, and Bravecto to several dogs.

80. Animal welfare officials from the Department notified Lund of the violation during an inspection of Lund's Facility on October 7, 2020, and instructed Lund to correct this violation by keeping complete individual medical records on all dogs in the Facility, including all treatments and all medications given, and all procedures performed.

81. On December 2, 2020, animal welfare officials from the Department undertook a re-inspection of Lund's Facility and observed that Lund again failed to document the daily medication administration of Coccid dewormer for several dogs.

82. On February 4, 2021, animal welfare officials from the Department undertook a routine inspection of Lund's Facility and observed one dog that was prescribed eye medication, however Lund was unable or unwilling to produce the daily medication records, claiming they were at a secondary location.

83. Lund failed to correct the violation.

84. The State seeks a temporary restraining order, preliminary and permanent injunction, and a \$1,000.00 civil penalty based on Lund failing to correct the past violation as authorized under Section 273.347.1 RSMo.

## **COUNT X**

### **December 2, 2020 Uncorrected Veterinary Care Violation**

85. ACFA Regulation 2 CSR 30-9.020(8)(B)4 requires Lund to establish and maintain programs of adequate veterinary care that include daily observation of all animals to assess their health and well-being.

86. Lund violated Regulation 2 CSR 30-9.020(8)(B)4 on December 2, 2020 by allowing the toenails of at least 4 dogs in the Facility to grow excessively long, causing discomfort and pain to the animals.

87. Animal welfare officials from the Department notified Lund of the violation during an inspection of Lund's Facility on December 2, 2020, and instructed Lund to correct this violation by keeping toenails trimmed.

88. On February 4, 2021, animal welfare officials from the Department undertook a routine inspection of Lund's Facility and observed that Lund failed to trim the dogs' toenails.

89. Lund failed to correct the violation.

90. The State seeks a temporary restraining order, preliminary and permanent injunction, and a \$1,000.00 civil penalty based on Lund failing to correct the past violation as authorized under Section 273.347.1 RSMo.

## **COUNT XI**

### **February 4, 2021 Uncorrected Housing Violation**

91. ACFA Regulations 2 CSR 30-9.030(1)(C)5.B and 2 CSR 30-9.030(1)(D)3 require Lund to provide all animals with adequate housing, and states that outside

floor areas in contact with the animals and exposed to the direct sun may not consist of bare dirt or sand and must have adequate drainage.

92. Lund violated Regulations 2 CSR 30-9.030(1)(C)5.B and 2 CSR 30-9.030(1)(D)3 on February 4, 2021 by having several outside floor areas comprised mostly of bare dirt.

93. Animal welfare officials from the Department notified Lund of the violation during an inspection of Lund's Facility on February 4, 2021, and instructed Lund to correct this violation by adding aggregate to the outdoor enclosures so that they were not comprised of bare dirt.

94. On April 1, 2021, animal welfare officials from the Department undertook a re-inspection of Lund's Facility and observed that Lund failed to add aggregate to the outside floor areas, which were still comprised of mostly bare dirt.

95. Lund failed to correct the violation.

96. The State seeks a temporary restraining order, preliminary and permanent injunction, and a \$1,000.00 civil penalty based on Lund failing to correct the past violation as authorized under Section 273.347.1 RSMo.

**COUNT XII**  
**February 4, 2021 Uncorrected Fire Detection Violation**

97. ACFA Regulation 2 CSR 30-9.030(1)(A)8 requires Lund to equip all indoor housing facilities with properly maintained smoke or heat detection devices and extinguishers in accordance with National Fire Code and local fire codes.

98. Lund violated Regulations 2 CSR 30-9.030(1)(A)8 on February 4, 2021 by having an under charged fire extinguisher in one of her sheltered buildings.

99. Animal welfare officials from the Department notified Lund of the violation during an inspection of Lund's Facility on February 4, 2021, and instructed Lund to correct this violation by replacing or recharging the fire extinguisher and ensuring that all other kennel buildings were equipped with the required safety devices.

100. On April 1, 2021, animal welfare officials from the Department undertook a re-inspection of Lund's Facility and observed that Lund failed replace or recharge the fire extinguisher and also observed nonfunctional smoke detectors in two other sheltered buildings.

101. Lund failed to correct the violation.

102. The State seeks a temporary restraining order, preliminary and permanent injunction, and a \$1,000.00 civil penalty based on Lund failing to correct the past violation as authorized under Section 273.347.1 RSMo.

**COUNT XIII**  
**February 4, 2021 Uncorrected Veterinary Care Violation**

103. ACFA Regulation 2 CSR 30-9.020(8)(B)2 requires Lund to establish and maintain programs of adequate veterinary care that include the use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and the availability of emergency, weekend, and holiday care.

104. Lund violated Regulations 2 CSR 30-9.020(8)(B)2 on February 4, 2021 by using expired Resorb electrolyte solution.

105. Animal welfare officials from the Department notified Lund of the violation during an inspection of Lund's Facility on February 4, 2021, and instructed

Lund to correct this violation by removing the expired product from the Facility and discontinuing the use of expired products in the future.

106. On April 1, 2021, animal welfare officials from the Department undertook a re-inspection of Lund's Facility and observed that Lund failed to remove the expired Resorb electrolyte solution and also found a tube of expired Bacitracin Neomycin Polymyxin eye ointment.

107. Lund failed to correct the violation.

108. The State seeks a temporary restraining order, preliminary and permanent injunction, and a \$1,000.00 civil penalty based on Lund failing to correct the past violation as authorized under Section 273.347.1 RSMo.

**COUNT XIV**  
**Free and Unrestricted Access to Inspection Authorities**

109. Section 273.348 RSMo and ACFA Regulations 2 CSR 30-9.020(1)(J) and 2 CSR 30-9.020(13)(B) require Lund to make her facility, animals, premises, and records available for inspections during normal business hours or at other times mutually agreeable.

110. Lund violated Section 273.348 RSMo and ACFA Regulations 2 CSR 30-9.020(1)(J) and 2 CSR 30-9.020(13)(B) on July 9, 2020, July 23, 2020, September 23, 2020, November 9, 2020, November 17, 2020, January 19, 2021, March 17, 2021, May 18, 2021, and May 26, 2021 by refusing and evading animal welfare officials from inspecting her facility, animals, premises, and records.

111. The State seeks a temporary restraining order, preliminary and permanent injunction, and a \$1,000.00 civil penalty based on Lund's repeated

violations of Section 273.348 RSMo and ACFA Regulations 2 CSR 30-9.020(1)(J) and 2 CSR 30-9.020(13)(B) as authorized under Section 273.347.1 RSMo.

WHEREFORE, the State asks this Court for a Judgment granting the following relief:

A. Issuing a Preliminary and Permanent Injunction prohibiting Lund from breeding any dogs, selling any dogs, or committing any further violations of the ACFA, CCPA and the regulations duly promulgated thereunder;

B. Issuing a Preliminary and Permanent Injunction requiring that Lund house all male dogs and female dogs separately, and prohibiting Lund from operating as a commercial breeder until such time as Lund completes the procedure applicable to all new applicants, including the requirement that the facility and all practices employed at the facility meet all requirements promulgated under 2 CSR 30-9.010 through 2 CSR 30-9.030.

C. Issuing an Order that allows the Department free and unrestricted access to inspect Lund's facilities, animals, premises, and records during normal business hours; and also to inventory each and every dog and puppy on the premises for the purposes of ensuring compliance with any injunctive relief; and also to require Lund to maintain photos for any reportedly dead dogs or dead puppies for the purposes of ensuring compliance with any injunctive relief;

D. Assessing against Lund a civil penalty in an amount up to \$1,000.00 per violation of the ACFA for a total of \$14,000 in accordance with Section 273.347 RSMo;

- E. Assessing costs of these proceedings against Lund; and
- F. Granting such other relief as may be just and proper.

Respectfully submitted,

ERIC SCHMITT  
Attorney General

/s/ Amanda R. Langenheim

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*Attorneys for Plaintiff*

STATE OF MISSOURI            )  
  ) SS VERIFICATION OF MATT ROLD  
COUNTY OF COLE            )

1. MATT ROLD, being duly sworn upon oath, deposes ad states as follows:
2. I am the Program Manager for the Animal Care Facilities Act Program in the Jefferson City Office of the Missouri Department of Agriculture.
3. I have read the foregoing petition, and know the contents thereof.
4. The statements and matters alleged are true of my own personal knowledge, except as to those matters stated upon information and belief and, as to such matter, I believe them to be true.

DATED this 10th day of June, 2021.

Matt Rold  
Matt Rold  
Program Manager

Subscribed and sworn to before me this 10<sup>th</sup> day of June, 2021

My Commissions expires:

*Sherryl Taylor*

SHANTELL TAYLOR  
Notary Public - Notary Seal  
STATE OF MISSOURI  
Cole County  
My Commission Expires: July 31, 2023  
Commission #: 15387135