

UNITED STATES DEPARTMENT OF AGRICULTURE  
BEFORE THE SECRETARY OF AGRICULTURE

In re:

LEROY FHLUG, an individual, d/b/a  
Wisconsin Puppy Patch, LLC,  
  
Respondent.

AWA Docket No. [23-J-0034](#)

COMPLAINT

REC'D OUSDA/OALJ/HCO  
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There is reason to believe that the respondent named herein has violated the Animal Welfare Act, as amended (7 U.S.C. §§ 2131-2159) (“Act” or “AWA”), and the regulations thereunder (9 C.F.R. §§ 1.1-2.153) (“Regulations”). Therefore, the Administrator of the Animal and Plant Health Inspection Service (“APHIS”) (“Complainant”) issues this complaint alleging the following:

JURISDICTIONAL ALLEGATIONS

1. Respondent LeRoy Fhlug (“Respondent”) is an individual doing business in the state of Wisconsin. Respondent’s mailing address will not be provided in this complaint, to protect his personal privacy, but will be provided to the Office of the Hearing Clerk, United States Department of Agriculture, for the purpose of service of this complaint and future documents in this proceeding.

2. At all times material herein, Respondent operated as a “dealer,” as that term is defined in the Act and the Regulations, without a valid license.

ALLEGED VIOLATIONS

3. On or about August 29, 2018, Respondent operated as a dealer, as that term is defined in the Act and the Regulations, selling and/or offering or delivering for transportation a dog, without holding a valid license, in violation of section 2134 of the Act (7 U.S.C. § 2134) and section 2.1(a)(1) of the Regulations (9 C.F.R. § 2.1(a)(1)).

4. On or about October 31, 2018, Respondent operated as a dealer, as that term is defined in the Act and the Regulations, selling and/or offering or delivering for transportation a dog, without holding a valid license, in violation of section 2134 of the Act (7 U.S.C. § 2134) and section 2.1(a)(1) of the Regulations (9 C.F.R. § 2.1(a)(1)).

5. On or about May 20, 2019, Respondent operated as a dealer, as that term is defined in the Act and the Regulations, selling and/or offering or delivering for transportation a dog, without holding a valid license, in violation of section 2134 of the Act (7 U.S.C. § 2134) and section 2.1(a)(1) of the Regulations (9 C.F.R. § 2.1(a)(1)).

6. On or about August 29, 2019, Respondent operated as a dealer, as that term is defined in the Act and the Regulations, selling and/or offering or delivering for transportation a dog, without holding a valid license, in violation of section 2134 of the Act (7 U.S.C. § 2134) and section 2.1(a)(1) of the Regulations (9 C.F.R. § 2.1(a)(1)).

WHEREFORE, it is hereby ordered that, for the purpose of determining whether Respondent has in fact violated the Act, and the Regulations issued under the Act, this complaint shall be served upon Respondent. Respondent shall file an answer with the Office of the Hearing Clerk, United States Department of Agriculture, 1400 Independence Avenue, S.W., South Building, Room 1031, Washington, D.C. 20250, in accordance with the Rules of Practice governing proceedings under the Act (7 C.F.R. §§ 1.130-1.151). Failure to file an answer shall constitute an admission of all material allegations of this complaint. APHIS requests that this matter proceed in accordance with the Rules of Practice governing proceedings under the Act, and that such order or orders be issued, as are authorized by the Act (7 U.S.C. § 2149) and warranted under the circumstances.

Done at Washington, D.C.  
this\_\_\_\_ day of\_\_\_\_\_, 2023

**MICHAEL WATSON** Digitally signed by MICHAEL  
WATSON  
Date: 2023.03.09 12:21:18 -05'00'

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Kevin Shea, Administrator  
Animal and Plant Health Inspection Service

SOFIA NADRI  
Attorney for Complainant  
Office of the General Counsel  
United States Department of Agriculture  
1400 Independence Avenue, S.W.  
South Building, Room 2318  
Washington, D.C. 20250  
Phone: (771) 215-9331  
Email: [Sofia.Nadri@usda.gov](mailto:Sofia.Nadri@usda.gov)