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UNITED STATES DEPARTMENT OF AGRICULTURE

BEFORE THE SECRETARY OF AGRICULTURE

In re: Becky and Leonard Goodman, Respondents.	AWA Docket No. 25- COMPLAINT

There is reason to believe that the Respondents named herein have violated the Animal Welfare Act, as amended (7 U.S.C. § 2131 et seq.) (AWA or Act), and the regulations (9 C.F.R. Part 2) (Regulations) and standards issued thereunder (9 C.F.R. Part 3) (Standards). Therefore, the Administrator of the Animal and Plant Health Inspection Service (APHIS) issues this complaint alleging the following:

JURISDICTIONAL ALLEGATIONS

1. Respondents Becky and Leonard Goodman (hereinafter, respondents) are individuals doing business in the state of Oklahoma. The respondents' address will not be provided in the Complaint to protect the respondents' personal privacy but will be provided to the Hearing Clerk, United States Department of Agriculture, for the purpose of service of this Complaint and future documents.

2. At all times material herein, respondents operated as a dealer as that term is defined in the Act and the regulations and held a Class A Breeder license, # 73-A-2754.

ALLEGED VIOLATIONS

3. On or about July 11, 2023, respondents violated the regulations (9 C.F.R. § 2.100) by by failing to meet the standards, as follows:

a. Several enclosures housing dogs had excessive rust on cage doors and metal pipe tubing at the bottom of the outdoor portion of the enclosures, which impacted the structural strength of the enclosures and impeded proper cleaning and sanitation, in violation of 9 C.F.R. § 3.1(c)(1)(i).

b. Several enclosures housing dogs contained food receptacles in which dog food was contaminated with rodent feces, in violation of 9 C.F.R. § 3.9(a).

c. Large amounts of overgrown grass and weeds were observed growing outside the perimeter of the facility, potentially providing harborage to vermin and other pests, in violation of 9 C.F.R. § 3.11(c).

d. The entire kennel displayed evidence of severe rodent contamination, in violation of 9 C.F.R. § 3.11(d).

e. Three dogs were found with ticks. Respondents thus failed to have or follow a program of veterinary care for their dogs that included a properly documented and effective external parasite protocol, in violation of 9 C.F.R. § 3.13(a)(3).

4. On or about March 31, 2025, respondents violated the regulations (9 C.F.R. § 2.40(b)(2) as follows:

a. An adult female dachshund that was nursing a litter of pups had been treated with a Permethrin dip even though the product label expressly forbade its use on nursing mothers, thereby potentially exposing her puppies to the dip on her coat.

b. Three dogs had a container of rodenticide on the floor of their enclosure, necessitating their evaluation and potential treatment by respondent's attending veterinarian for exposure to the rodenticide.

5. On or about March 31, 2025, respondents further violated the regulations (9 C.F.R. § 2.100)

by failing to meet the standards, as follows:

a. Multiple outdoor enclosures housing dogs had rust and holes with sharp points and jagged edges in their metal surfaces, thereby posing a risk to enclosed animals and providing potential access points for rodents and pests, in violation of 9 C.F.R. § 3.1(a).

b. There were several areas of standing water around the facility that contained algae, debris, and animal waste, potentially attracting insects and pests, in violation of 9 C.F.R. § 3.1(f).

c. Respondents did not have an exercise program for dogs approved by their attending veterinarian, in violation of 9 C.F.R. § 3.8.

d. Large amounts of overgrown grass, weeds, and brush were observed growing outside the perimeter of the facility, potentially providing harborage to vermin and other pests, in violation of 9 C.F.R. § 3.11(c).

e. The entire kennel continued to display evidence of severe rodent contamination, in Violation of 9 C.F.R. § 3.11(d).

6. On or about July 1, 2025, respondents violated the regulations (9 C.F.R. § 2.100) by failing to meet the standards, as follows:

a. The entire kennel continued to display evidence of severe rodent contamination, in violation of 9 C.F.R. § 3.11(d).

7. On or about August 21, 2025, respondents violated the regulations (9 C.F.R. § 2.126(b)) by failing to have a responsible adult available to provide APHIS inspectors with access to their facility and to accompany them in an inspection of the same.

8. On or about September 4, 2025, respondents violated the regulations (9 C.F.R. § 2.40(b)(2)) as follows:

a. A six-month old male dachshund was found in lateral recumbency, non-responsive,

and displaying an agonal breathing pattern. Respondents took the dog to their attending veterinarian for emergency treatment but the dog died before treatment could be initiated. Respondents both failed to identify and seek timely veterinary treatment for this dog's condition and they failed to maintain medical records for this dog.

9. On or about September 4, 2025, respondents further violated the regulations (9 C.F.R. § 2.100) by failing to meet the standards, as follows:

a. An open box of dog biscuits was found on the ground in the central kennel area and contaminated with roaches, rendering them unfit for animals to eat, in violation of 9 C.F.R. § 3.9(a).

b. The water bowls for approximately 34 dogs were contaminated with dead roaches and insects, in violation of 9 C.F.R. § 3.10(a).

c. The entire kennel displayed evidence of a severe roach infestation, in violation of 9 C.F.R. § 3.11(d).

d. Respondents failed to keep and present medical records for the six-month old dachshund that had been found in lateral recumbency and non-responsive and which subsequently died, in violation of 9 C.F.R. § 3.13(b).

10. On or about December 4, 2025, respondents violated the regulations as follows:

a. A five- to six-month old dachshund had widespread hair loss and a skin condition on its face that had persisted for approximately one month, but respondents had not taken the dog to their attending veterinarian for treatment, in violation of 9 C.F.R. § 2.40(b)(2).

b. None of the adult dogs at the facility had an identification tag affixed to its collar as described in 9 C.F.R. § 2.51 or any form of permanent identification, in violation of 9 C.F.R. § 2.50(a)(1).

c. A facility representative disclosed that respondents failed to handle animals as carefully as possible to prevent discomfort or harm by allowing a male cocker spaniel named "Kemper" to escape the kennel through an open door on March 10, 2025, and never recovering him, in violation of 9 C.F.R. § 2.131(b)(1).

11. On or about December 4, 2025, respondents further violated the regulations (9 C.F.R. § 2.100) by failing to meet the standards, as follows:

a. The cement walls that formed the base of the indoor portion of each primary enclosure had holes large enough for the entry and harborage of pests and two of the kennel's indoor/outdoor access doors were broken or missing, in violation of 9 C.F.R. § 3.1(a).

b. A male dog named "Cooper" escaped its enclosure during the inspection and was running freely in the kennel area, where it was exposed to various hazards, such as chemicals and rodenticides that were being stored in the kennel, in violation of 9 C.F.R. § 3.6(a)(2)(iii).

c. Two bowls of food contained live roaches, in violation of 9 C.F.R. § 3.9(a).

d. The water bowls for approximately adult 20 dogs and 7 puppies were contaminated with roaches, in violation of 9 C.F.R. § 3.10(a).

e. Blankets that were being used as bedding for two groups of puppies were excessively wet and there was an accumulation of old, dried fecal matter under and around the blankets, in violation of 9 C.F.R. § 3.11(a).

f. The entire kennel continued to display evidence of a severe roach infestation, in violation of 9 C.F.R. § 3.11(d).

g. Respondents did not maintain any records of their attending veterinarian conducting annual physical examinations of the dogs under their care, in violation of 9 C.F.R. § 3.13(a)(2).

h. Respondents were not following their written program of veterinary care's guidance

on grooming, as evidenced by the presence of a dog named "Oreo" that had severely matted hair on its chest, abdomen, and legs, in violation of 9 C.F.R. § 3.13(a)(4).

12. On or about December 8, 2025, respondents violated the regulations (9 C.F.R. § 2.40(b)(2)) as follows:

a. Two twelve-week-old dachshund puppies named "Boomer" and "Sooner" were found to be lethargic, weak, and dehydrated, and areas of blood and bloody stool were found in their enclosure, but Respondents had not noticed the dogs' condition and had not contacted their attending veterinarian to have the dogs treated.

13. On or about December 8, 2025, respondents further violated the regulations (9 C.F.R. § 2.100) by failing to meet the standards, as follows:

a. The water bowls for approximately 22 adult dogs and 5 puppies were contaminated with roaches, in violation of 9 C.F.R. § 3.10(a).

WHEREFORE, it is hereby ordered that for the purpose of determining whether respondents have, in fact, violated the Act and regulations promulgated thereunder, this complaint shall be served upon respondents. Respondents shall have twenty (20) days after service of this complaint in which to file an answer with the Hearing Clerk, United States Department of Agriculture, Washington, D.C. 20250-1400, in accordance with the applicable Rules of Practice (7 C.F.R. § 1.136). Failure to deny or otherwise respond to any allegation in this complaint shall constitute an admission of the allegation. Failure to file an answer within the prescribed time shall constitute an admission of the allegations in this complaint and a waiver of hearing.

Done at Washington, D.C.

this ____ day of _____ 2025

MICHAEL WATSON

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Michael Watson
Administrator
Animal and Plant Health Inspection Service

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