

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NASSAU**

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**PEOPLE OF THE STATE OF NEW YORK by  
ANDREW M. CUOMO, Attorney General of the  
State of New York,**

**Petitioners,**

**VERIFIED PETITION**

**-against-**

**Index No.**

**RJI No.**

**IMPORTED QUALITY GUARD DOGS, INC.,  
THE ANIMAL RESCUE UNIT, INC., ROBIN  
SCHULDER and PERRY REICH,**

**Respondents.**

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The People of the State of New York, by their attorney, ANDREW M. CUOMO,  
Attorney General of the State of New York, respectfully allege upon information and belief:

**INTRODUCTION**

1. Petitioners bring this special proceeding pursuant to New York State Executive Law §§ 63(12) and 175(2)(e) and General Business Law (“GBL”) §§ 349 and 350 to protect the public from respondents’ fraudulent, illegal and deceptive business practices in connection with respondents’ business operations. Respondents have been operating as pet dealers who sell various breeds of dogs. They also purport to engage in animal rescue activities through their not-for-profit organization, The Animal Rescue Unit, Inc. Respondents make numerous misrepresentations on their websites, as well as in their communications with consumers, as to the health, breeding and pedigree of the dogs offered for sale, the source of the dogs, the availability of particular dogs offered

for sale, the training of dogs and other material facts. They engage in deceptive business practices and false advertising. They have violated the Pet Lemon Law by selling animals that are unfit for purchase, by failing to honor consumers' rights to obtain redress under the statute, and by failing to provide consumers with required notices and documentation. In violation of the Agriculture and Markets Law, respondents have failed to have dogs examined by a veterinarian prior to sale, falsified health certificates and failed to maintain records for the dogs they have acquired and sold as mandated by the statute. Ms. Schulder has violated the Education Law by engaging in the unlicensed practice of veterinary care and improperly making use of the title, "veterinarian technician." Respondents have also violated Article 7-A of the Executive Law governing charitable organizations. Respondents' conduct constitutes false advertising and deceptive business practices in violation of GBL §§ 349 and 350, violations of Article 7-A of the Executive Law governing charities, and persistent and repeated fraud and illegality in violation of Executive Law § 63(12).

#### **PARTIES AND JURISDICTION**

2. Petitioners are the People of the State of New York, by their attorney, ANDREW M. CUOMO, Attorney General of the State of New York.

3. Respondent Robin Schulder is a New York resident who resides at 80-42 Bell Boulevard, Queens Village, New York 11427.

4. Respondent Perry Reich is the husband of Robin Schulder and also resides at 80-42 Bell Boulevard, Queens Village, New York 11427.

5. Respondent Imported Quality Guard Dogs, Inc. is a domestic corporation with its principal place of business at 80-42 Bell Boulevard, Queens Village, New York 11427. Robin Schulder and Perry Reich are officers of Imported Quality Guard Dogs, Inc.

6. Respondent The Animal Rescue Unit, Inc. is a domestic not-for-profit corporation with its principal place of business at 80-42 Bell Boulevard, Queens Village, New York 11427. Robin

Schulder is the president and Perry Reich is the secretary of the Animal Rescue Unit, Inc. (Imported Quality Guard Dogs, Inc., The Animal Rescue Unit, Inc., Robin Schulder and Perry Reich are collectively referred to herein as “respondents.”)

7. This Court has jurisdiction pursuant to Executive Law § 63(12), which authorizes the Attorney General to commence a special proceeding for injunctive relief, restitution, and other relief against any person or business entity that has engaged in fraudulent, deceptive or illegal acts or persistent or repeated fraud or illegality in the carrying on, conducting or transacting of business.

8. The Court also has jurisdiction pursuant to GBL §§ 349 and 350, which authorize the Attorney General to seek injunctive relief, restitution, and other relief when any person or entity engages in deceptive acts or false and misleading advertising in the conduct of any business.

9. The Court also has jurisdiction pursuant to Executive Law § 175, which authorizes the Attorney General to bring a special proceeding against charitable organizations and any persons acting on their behalf for violations of any provision of Article 7-A of the Executive Law, and for specified fraudulent acts and other wrongdoing.

### **FACTS**

10. Beginning in or about 2003, respondents have been operating as dealers of various dog breeds. Respondents also represent that they are dog breeders, but the evidence does not support this assertion. Imported Quality Guard Dogs, Inc. was licensed as a pet dealer by the New York State Department of Agriculture and Markets, but on June 3, 2009, following a hearing, the Department of Agriculture issued a final determination refusing to renew the license. The Department of Agriculture ordered that Imported Quality Guard Dogs, Inc. “not conduct any operations which require a pet dealer license pursuant to Article 26-A of the Agriculture and Markets Law of the State of New York, unless and until it is duly licensed by the Commissioner to conduct such activity.” Respondents have appealed the order.

11. Respondents maintain various websites, including, but not necessarily limited to the following:

[www.beverlyhillsbreeders.com](http://www.beverlyhillsbreeders.com)  
[www.qualityimportedguarddogs.com](http://www.qualityimportedguarddogs.com)  
[www.tinyteacupuppiesforsale.com](http://www.tinyteacupuppiesforsale.com)  
[www.englishbulldogpuppiesny.com](http://www.englishbulldogpuppiesny.com)  
[www.bulliepuppiesforsale.com](http://www.bulliepuppiesforsale.com)  
[www.englishbulldogpups.us](http://www.englishbulldogpups.us)  
[www.englishbulldogpuppiesale.com](http://www.englishbulldogpuppiesale.com)  
[www.bulldogrus.net](http://www.bulldogrus.net)  
[www.englishbulldogspup.com](http://www.englishbulldogspup.com)  
[www.manhattanbulldogs.com](http://www.manhattanbulldogs.com)  
[www.4netmarketing.com/englishbulldogs/englishbulldogpuppies.htm](http://www.4netmarketing.com/englishbulldogs/englishbulldogpuppies.htm)  
[www.4netmarketing.com/baby/yorkies.htm](http://www.4netmarketing.com/baby/yorkies.htm)  
[www.englishbulldogpuppybreeders.com](http://www.englishbulldogpuppybreeders.com)  
[www.tinyteacupyorkiepuppies.com](http://www.tinyteacupyorkiepuppies.com)

12. In the past several years, the OAG has received 13 complaints from consumers about respondents' business practices. The New York Better Business Bureau has received approximately 11 similar complaints. Additional complaints have been received by the New York Department of Agriculture and the ASPCA.

**Respondents' False Advertising and Deceptive Business Practices**

13. Respondents advertise particular dogs for sale that, in fact, are not available for sale. They also engage in "bait and switch" sales tactics. After a consumer selects a particular dog for purchase that is pictured on one of respondents' websites, the consumer is then presented with a different dog.

14. Respondents' websites includes pictures of many puppies, some which are listed with names, weight, sex, age, price and "status: available." In fact, these pictures are not pictures of puppies which respondents have sold or have available for sale, but are merely pictures which respondents obtained from other sources, and which have no connection with respondents' business.

15. In at least two instances, consumers selected particular dogs to purchase, and respondents represented that the particular dogs chosen would be delivered to the consumers. Instead, in each instance, the consumers received dogs that were markedly different from the ones they had selected.

16. Respondents misrepresent to consumers that dogs for sale have been bred and raised in the home of Ms. Schulder and Mr. Reich, when, in fact, respondents obtain the dogs from third parties, and then re-sell them to consumers.

17. On their multiple websites, respondents hold themselves out as “breeders.” For example, on the website, [www.englishbulldogpuppiesny.com](http://www.englishbulldogpuppiesny.com), respondents advertise under the name, “Platinum English Bulldogs.” They claim they have been breeding bulldogs for 15 years and assert that “all our babies are born in our home.” The website states: “We do not import and we are not pet brokers.” These representations are false. Respondents have not been breeding bulldogs for 15 years, all the puppies they sell are not born in their home, and respondents do import dogs for sale, and do, in fact, act as pet brokers.

18. On the website, [www.qualityimportedguarddogs.com](http://www.qualityimportedguarddogs.com), respondents represent: “We are Robin and John from New York. We have been breeding, training and raising dogs since the early 1990’s. . . . Our dogs are loyal loving members of our family and would give their life for us or you! All our dogs love kids and are raised around kids of all ages.” Respondents represent that they engage in a “careful and selective breeding process,” and that they have a litter of beautiful pit bull puppies and several breeds of German Shepherds and Rottweilers for sale. In fact, respondents have not bred or raised any of these breeds, or any of the dogs offered or sold through this website. Instead, the dogs were bought from a retail pet store, or from sources found on the internet.

19. Respondents do not disclose to consumers that the dogs have been obtained from third parties, and have not been bred by respondents as represented on the websites.

20. Respondents repeatedly misrepresent to customers that the parents of the English bulldogs they are buying are “on the premises,” when, in fact, the adult bulldogs that respondents own are not the parents of the dogs they are selling.

21. On [www.beverlyhillsbreeders.com](http://www.beverlyhillsbreeders.com), respondents advertise that Beverly Hills Breeders is “a network of private breeders that specialize in micro, teenie, tiny puppies,” that “all of our puppies are raised in a loving family environment” and that it “is not a broker or reseller of puppies from other breeders like many other web sites out there.” “We will not offer a puppy for sale if we are not sure that the puppy comes from a strong genetically clean bloodline.” In fact, there is no Beverly Hills Breeders and there is no network of private breeders. The website is solely operated by respondents who are posing as a “network of private breeders,” when, in fact, they are operating as brokers and resellers.

22. On [www.beverlyhillsbreeders.com](http://www.beverlyhillsbreeders.com), respondents represent that they have all kinds of puppies: “Micro teeny tiny Yorkies, micro teeny tiny Chihuahuas, micro teeny tiny Maltese, micro teeny tiny Shih Tzus, micro teeny tiny Poodles, and mini and standard English bulldogs” “available now and ready to ship to you, or you may come pick up your puppy.” The representation is false. Respondents do not have any of these puppies available, but, instead, obtain them from other sources.

23. The website also claims: “Some of our puppies are imported from our family-owned kennel in Europe.” This is an outright lie. Respondents do not have a family-owned kennel in Europe.

24. Respondents make various representations regarding the hereditary backgrounds of the dogs they sell, but these claims are totally contrived. Respondents have failed to obtain any verification, or even to make inquiries, regarding the pedigree or lineage of the animals they obtained from third parties for re-sale.

25. Respondents represent on their website, [www.beverlyhillsbreeders.com](http://www.beverlyhillsbreeders.com): “We will not offer a puppy for sale if we are not sure that the puppy comes from a strong, genetically-clean bloodline.” “As a result, chances of you getting a puppy with genetic problems are slim to none.” In fact, respondents do not receive any documentation regarding the puppies’ bloodlines, and know next to nothing about the parties from whom they buy their dogs, or their breeding practices.

26. On other websites, respondents make multiple representations regarding the lineage of the adult dogs that they own and allegedly breed, as well as the puppies they sell. On [bulliepuppiesforsale.com](http://bulliepuppiesforsale.com), where respondents represent that they are breeders, they state: “We are now taking deposits for placement on our waiting list from approved families. . . .This litter of English bulldog puppies is bred out of English & World Champion Bloodlines.” They further claim: “Each of our English Bulldogs Is of Top Show Quality, from the Best Champion Bloodlines & Health Certified Before they Ever Produce Any English Bulldog Puppies of their Own!” The various puppies that are listed as “available” are described as having “both parents. . .from top Champion bloodlines.” On [englishbulldogspup.com](http://englishbulldogspup.com), they represent that their male adults are of “top quality English Bulldog Show Champion Lines!” On [englishbulldogpups.us](http://englishbulldogpups.us), they claim: “Many of our adult English bulldogs are 2x and 3x show dog winners. They have won 1<sup>st</sup> place at the Bulldog Shows we attend all over the United States. We breed these Adult Bulldogs to produce puppies and provide you with puppies that will be #1 as their parents are!” These representations are all false. Again respondents cannot verify the lineage or pedigree of the puppies they sell, nor can they verify the hereditary background of the adult dogs they own and allegedly breed. Respondents have not attended dog shows all over the United States, but, at most, have only attended two neighborhood dog shows with their bulldogs. Despite the representation on the website, [www.tinyteacuppuppies.com](http://www.tinyteacuppuppies.com), that “[o]ur tiny babies have won ribbons and medals many times,” respondents have never shown any of their teacup yorkies.

27. Ms. Schulder misrepresents to consumers that she is a dog trainer, when in fact she is not a professional dog trainer, and has no certification or expertise as a dog trainer. On the website, [www.qualityimportedguarddogs.com](http://www.qualityimportedguarddogs.com), respondents advertise that they have been breeding, training and raising dogs since the early 1990s, and provide obedience training and protection training and Schutzhund training of all levels. In fact, respondents are not professional trainers, and have no certification or expertise as trainers. Furthermore, respondents have never used a professional trainer to train any of the dogs they sell. Respondents have also represented to consumers that the dogs they are purchasing have received particular types of training, when, in fact, respondents have no knowledge as to the dogs' training.

28. Respondents misrepresent that they will provide consumers with registration papers for their dogs. In fact, respondents do not provide any certification as to the dogs' breed or pedigree. Instead, respondents give their customers application papers for the sham "Dogs of Registry America," an unsanctioned "kennel club," which, for a \$25 fee, allows the "registration" of dogs, without requiring any proof as to parentage, lineage or pedigree. Respondents admit that the puppies they sell do not qualify for AKC registration.

29. Respondents represent on the websites they maintain for the purpose of selling dogs that they "also run a No-Kill Animal Shelter that rescue strays in the 5 boroughs of New York City." Respondents have also represented that they have "over 2,000 supporters and donators." Respondents have been unable, however, to produce any records whatsoever identifying any dogs they have rescued, and admit that their "animal rescue charity," the Animal Rescue Unit Inc., is inactive.

30. On their multiple websites, respondents represent that they offer guarantees of one year or more on the dogs they sell, but then fail to honor the terms of those guarantees.

31. Respondents have made numerous misrepresentations regarding the identity of the principals and employees involved in their business. Ms. Schulder has used numerous aliases in an attempt to hide her true identity.

32. Respondents have made numerous misrepresentations regarding the locations where they allegedly breed and raise dogs. For example, they have falsely stated that dogs are bred on a farm upstate owned by Ms. Schulder, and that Ms. Schulder owns property in Florida. These statements are false.

33. Respondents misrepresent the ages of the dogs they offer for sale. They misrepresent that puppies roam free in their home, that they have had many famous celebrities as customers, that they are breeders of extremely rare blue English bulldogs, and that shipping puppies by air is “100 percent safe.”

34. Respondents represent that the puppies they sell are checked by a veterinarian prior to sale. For example, on [englishbulldogpups.us](http://englishbulldogpups.us), respondents represent: “All of our puppies come with a vet certificate.” Similar representations are made on the other websites as well. Article 26-A of the Agriculture and Markets Law, section 401.5(b), mandates that all dogs be examined by a veterinarian prior to sale. Yet, despite respondents’ representations and the unequivocal requirements of the law, respondents have in numerous instances failed to have the dogs examined by a veterinarian.

35. In some instances, respondents failed to provide a health certificates to consumers. In other instances, respondents gave out falsified health certificates to consumers representing that the dogs had been examined by a veterinarian, when, in fact, they had not.

36. Ms. Schulder has misrepresented to consumers that she is a licensed veterinary technician. In fact, she has no training or certification in the veterinarian field, and has never been licensed as a veterinary technician.

### **Respondents' Sale of Dogs That Are Unfit For Purchase**

37. Numerous consumers purchased animals that suffered from illnesses ranging from parvo, coccidia, mange, acute respiratory infection, pneumonia and life-threatening hypoglycemia. Other consumers purchased animals that suffered from deformities of the limbs, entropion eyelids, elongated palates, malformations of the hip or elbow, blindness due to neurological conditions and congenital defects of the trachea.

38. Respondents sold consumers dogs that had visible signs of illness, such as coughing, sneezing and nasal discharge. Respondents also sold dogs that were very ill, with bloody stool, loss of appetite and vomiting.

39. In a number of instances, consumers purchased dogs that were examined and certified by veterinarians to be "unfit for purchase due to illness," despite respondents' representations prior to sale and guarantees that these animals were in good health. In at least two cases, certificates of unfitness for purchase were received from not only the consumers' own veterinarians, but from respondents' veterinarian as well.

40. In some instances, consumers incurred extensive veterinary bills ranging from over \$1,000 to \$3,000 in trying to nurse the animals back to health. One dog died, and two suffered such severe medical issues that they had to be euthanized.

41. Respondents have been uncooperative when consumers have attempted to receive refunds or reimbursements for veterinary bills, or to return sick dogs. In certain instances, respondents refused to accept the return of the dogs, or to provide refunds. Moreover, Ms. Schulder has been verbally abusive to consumers, lashing out at them with vicious obscenities, and blaming them for their dogs' illnesses or death. In one instance, when a husband and wife attempted to return

their dog, Ms. Schulder answered the door waving a large kitchen knife at them, and the police had to be called.

42. Respondents have deliberately sought to diminish the severity of the sick dogs' symptoms, or to blame the dogs' illnesses on the consumers, in an attempt to avoid issuing refunds or reimbursements, or to avoid taking the animals back. In one case, even after respondents' own veterinarian had issued a finding that a puppy suffered from congenital blindness, Ms. Schulder continued to insist that the consumer had dropped the puppy on its head.

**FIRST CAUSE OF ACTION  
PURSUANT TO EXECUTIVE LAW § 63(12)**

43. Petitioners repeat and re-allege allegations 1 through 42 of the Verified Petition.

44. Executive Law § 63(12) prohibits repeated fraudulent acts or persistent fraud in the carrying on, conducting or transacting of business.

45. As set forth above, respondents are engaging in repeated and persistent fraudulent conduct in violation of Executive Law § 63(12).

**SECOND CAUSE OF ACTION  
PURSUANT TO EXECUTIVE LAW § 63(12)  
(Violation of GBL § 349)**

46. Petitioners repeat and re-allege allegations 1 through 45 of the Verified Petition.

47. GBL § 349 declares it unlawful to engage in deceptive acts or practices in the conduct of any business, trade or commerce or in the furnishing of any service in the State of New York.

48. As set forth above, respondents are engaging in repeated and persistent deceptive acts in violation of GBL § 349.

49. As a consequence, respondents are engaging in repeated and persistent illegal conduct in violation of Executive Law § 63(12).

**THIRD CAUSE OF ACTION  
PURSUANT TO EXECUTIVE LAW § 63(12)  
(Violation of GBL § 350)**

50. Petitioners repeat and re-allege allegations 1 through 49 of the Verified Petition.

51. GBL § 350 declares unlawful any false advertising in the conduct of any business, trade or commerce in the State of New York.

52. As set forth above, respondents are engaging in repeated and persistent false advertising in violation of GBL § 350.

53. As a consequence, respondents are engaging in repeated and persistent illegal conduct in violation of Executive Law § 63(12).

**FOURTH CAUSE OF ACTION  
PURSUANT TO EXECUTIVE LAW § 63(12)  
(Violations of Article 35-D of the GBL, §§ 753 -755)**

54. Petitioners repeat and re-allege allegations 1 through 53 of the Verified Petition.

55. Article 35-D of the General Business Law, commonly referred to as the Pet Lemon Law, requires pet dealers to guarantee the good health of the animals they sell. Section 753 provides remedies to consumers who purchase an animal that is unfit for purchase due to illness, a congenital malformation which adversely affects the health of the animal, or the presence of symptoms of a contagious or infectious disease.

56. In violation of Article 35-D, petitioners have sold animals that are unfit for purchase and have failed to honor consumers' rights to obtain redress under the law.

57. Furthermore, section 753-b of the General Business Law requires a pet dealer, at the time of sale, to provide the purchaser with a written statement disclosing information including the

source of the dog, the date of the dog's birth and the date the dealer received the dog, the breed, sex, color and identifying marks at the time of sale, a record of inoculations and worming treatments administered, a signed statement indicating that the dog has no known disease or illness, or congenital or hereditary condition that adversely affects its health, or a record disclosing such condition. It also requires the dealer to post a notice stating that information on the source of the dogs and the veterinary treatments received is available for review. Section 754 requires that a pet dealer post a notice and provide consumers at the time of sale with a written notice setting forth the consumers' rights under the Pet Lemon Law.

58. Consumers who purchased dogs from respondents did not receive the documentation required under sections 753 and 754. Respondents also failed to post the notices required under sections 753 and 754.

59. In addition, section 753-c requires any pet dealer who states, promises or represents that an animal is registered or capable of registration to provide the appropriate documents necessary for such registration, and to make specified disclosures to consumers regarding the registration. Respondents have failed to comply with section 753-c.

60. As set forth above, respondents have persistently and repeatedly violated Article 35-D of the General Business Law.

61. As a consequence, respondents are engaging in repeated and persistent illegal conduct in violation of Executive Law § 63(12).

**FIFTH CAUSE OF ACTION  
PURSUANT TO EXECUTIVE LAW § 63(12)  
(Violations of Article 135 of the Education Law)**

62. Petitioners repeat and re-allege allegations 1 through 61 of the Verified Petition.

63. Pursuant to Section 6702 of the Education Law, only a person licensed or exempt under Article 135 "shall practice veterinary medicine," which under section 6701, is defined as

“diagnosing, treating, operating or prescribing for any animal disease, pain, injury, deformity or physical condition. . . .” Ms. Schulder is neither licensed nor exempt under section 6705 of the law.

64. Ms. Schulder has performed surgical operations on her dogs.

65. Ms. Schulder’s performance of operations on her dogs constitutes the unauthorized practice of veterinary medicine within the express language of the statute.

66. Pursuant to section 6709, only a person licensed or exempt under Article 135 “shall practice veterinary technology or use the title “veterinary technician.” Ms. Schulder is neither licensed nor exempt under the law. Ms. Schulder’s repeated representations to consumers that she is a veterinarian technician constitute the unauthorized use of a professional title pursuant to section 6513 of the Education Law.

67. As set forth above, respondents have persistently and repeatedly violated Article 135 of the Education Law.

68. As a consequence, respondents are engaging in repeated and persistent illegal conduct in violation of Executive Law § 63(12).

**SIXTH CAUSE OF ACTION  
PURSUANT TO EXECUTIVE LAW § 63(12)  
(Violations of Article 26-A of the Agriculture and Markets Law)**

69. Petitioners repeat and re-allege allegations 1 through 68 of the Verified Petition.

70. Pursuant to Article 26-A of the Agriculture and Markets Law, section 402, respondents were required to maintain certain records for each animal purchased, acquired, held, sold or otherwise disposed of. The records required to be kept under that section for a two-year period include the name and address of the person from whom each animal was acquired, the federal dealer identification number of the seller, if applicable, the date the animal was acquired, a description of the animal showing age, color, markings, sex, breed, and any inoculation, worming, or other veterinary treatment

or medication available, the name and address of the person to whom each animal was sold or otherwise transferred, and the date sold or transferred.

71. Respondents have failed to maintain the records as required by the statute.

72. As a consequence, respondents are engaging in repeated and persistent illegal conduct pursuant to Executive Law § 63(12).

**SEVENTH CAUSE OF ACTION  
VIOLATION OF ARTICLE 7-A OF THE EXECUTIVE LAW**

73. Petitioners repeat and re-allege allegations 1 through 72 of the Verified Petition.

74. Pursuant to section 175 of the Executive Law, the Attorney General is empowered to bring a special proceeding against any organization or person acting on its behalf who operates in violation of Article 7-A.

75. Section 172-d prohibits any person from stating or implying “that a charitable organization conducts any activities in New York and/or benefits New York residents unless it conducts such activities and/or provides such benefits.” It also prohibits any person from failing to maintain books and records.

76. Respondents’ representations that The Animal Rescue Unit, Inc. runs a no-kill animal shelter violate the provisions of section 172-d that prohibit a person from stating or implying “that a charitable organization conducts any activities in New York and/or benefits New York residents unless it conducts such activities and/or provides such benefits.” Respondents have also violated section 172-d by failing to maintain books and records.

WHEREFORE, petitioners request that this Court grant relief against respondents pursuant to Executive Law §§63(12) and 175.2(a), GBL §§ 349 and 350, and Article 23-a of the GBL by issuing an order and judgment:

1. permanently enjoining respondents, their employees, agents, successors, heirs and assigns from operating, promoting or participating in any business relating to the selling, breeding, training, boarding or care of animals, or relating to animals in any way;
2. ordering respondents, their employees, agents, successors, heirs and assigns to shut down and discontinue all activity on all websites operated or controlled by respondents;
3. permanently enjoining respondents from operating, promoting or participating in any animal-related charitable organizations or activities;
4. permanently enjoining respondents, their employees, agents, successors, heirs and assigns from soliciting or collecting funds or property for or on behalf of the Animal Rescue Unit, Inc., or engaging in any activity in connection with the Animal Rescue Unit, Inc, canceling all registration statements previously filed with the Attorney General and dissolving the Animal Rescue Unit, Inc.,
5. permanently enjoining respondents, their employees, agents, successors, heirs and assigns from engaging in the deceptive, fraudulent and illegal acts and practices alleged herein;
6. permanently enjoining respondents, their employees, agents, successors, heirs and assigns from engaging in any business concerning consumers in the State of New York until a \$1,000,000 bond is posted with the Attorney General of the State of New York by a surety or bonding company licensed and approved by the Superintendent of Insurance of the State of New York;
7. directing respondents to provide an accounting with the names, addresses, telephone numbers and the amount of money received from each customer of respondents;
8. directing respondents to pay restitution to all entitled consumers, known and unknown;
9. directing respondents to pay a civil penalty in the sum of \$5,000 to the State of New York, pursuant to GBL § 350-d, for each violation of GBL §§ 349 and 350;

7. awarding petitioners costs of \$2,000 against each respondent pursuant to CPLR § 8308; and
8. granting petitioners such further relief as this Court deems just.

Dated: Mineola, New York  
January 6, 2010

ANDREW M. CUOMO  
Attorney General of the State of New York

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