

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

PEOPLE OF THE STATE OF NEW YORK by  
Letitia James, Attorney General of the State of  
New York,

Petitioner,

-against-

QUALITY CANINES INC., PUPPY PETITE  
INC., CNS ANIMAL RESCUE  
INCORPORATED, N&M ANIMAL RESCUE,  
INC., FIDELINA ESTEVEZ, PHILIP  
REINHARDT, MARIA RAMIREZ, NOAH  
REINHARDT, and LESIER RAMIREZ  
ESTEVEZ (collectively and individually, d/b/a  
“Puppy Boutique,” “Puppy Petite,” “Maxies  
Babies,” “Maxine's Puppies,” “NYC Bichpoo,”  
“NYC Chihuahua,” “NYC Maltese,” “NYC  
Morkies,” “NYC Pomeranian,” “NYC  
Poodles,” “NYC Shih Tzu,” and “NYC  
Yorkies”),

Respondents.

Index No.:

Hon.

**VERIFIED PETITION**

The People of the State of New York, by their attorney, Letitia James, Attorney General of the State of New York, respectfully allege, upon information and belief:

**INTRODUCTION**

1. The Office of the New York State Attorney General (hereinafter “Petitioner” or “OAG”) brings this special, summary proceeding to permanently enjoin the respondents, Quality Canines Inc., Puppy Petite Inc., CNS Animal Rescue Incorporated, N&M Animal Rescue, Inc., Fidelina Estevez, Philip Reinhardt, Maria Ramirez, Noah Reinhardt, and Lesier Ramirez Estevez (collectively and individually, d/b/a “Puppy Boutique,” “Puppy Petite,” “Maxies Babies,” “Maxine's Puppies,” “NYC Bichpoo,” “NYC Chihuahua,” “NYC Maltese,” “NYC Morkies,” “NYC Pomeranian,” “NYC Poodles,” “NYC Shih Tzu,” and “NYC Yorkies”) (hereinafter

“Respondents”), from engaging in the unlawful sale of dogs, cats, rabbits, or guinea pigs either directly or through any business entity or third party acting under their direction or control, in violation of the General Business Law (“Gen. Bus.”) § 753-f (hereinafter “the Puppy Mill Pipeline Act” or “Gen. Bus. § 753-f”) and the Administrative Code of the City of New York (“Administrative Code”) §§ 17-1702(a)-(b), and other applicable statutes.

2. As of December 15, 2024, it is illegal throughout the State of New York for retail pet shops to sell, lease, offer to lease, offer to sell, barter, auction, or otherwise transfer ownership of dogs, cats, or rabbits. Gen. Bus. § 753-f. Governor Kathy Hochul signed Gen. Bus. § 753-f into law on December 15, 2022, and retail pet shops, like those operated by Respondents, were thereafter on notice that the law would take effect two years later. In New York City, pet shops are prohibited from selling guinea pigs in addition to dogs, cats, and rabbits, and home breeding and sales are also prohibited. Administrative Code §§ 17-1702(a)-(b). Petitioner also seeks to enjoin Respondents from engaging in fraudulent, deceptive, and illegal business practices in violation of Executive Law (“Exec. Law”) § 63(12) and Gen. Bus. § 350. Petitioner further seeks civil penalties, disgorgement, and costs, as authorized by statute, to be paid to the State of New York, among other relief.

3. Since at least December 15, 2024, the date that Gen. Bus. § 753-f went into effect, Respondents have engaged in an unlawful and deceptive scheme to continue selling dogs at 8002 17th Avenue, which is also known as 1690 80th Street, in Brooklyn, from the storefront on 17th Avenue, which is advertised online as “Puppy Boutique” and “Puppy Petite”) and the dwellings accessible through the 80th Street entrance to the building, which are advertised online as “Maxies Babies,” “Maxine's Puppies,” “NYC Bichpoo,” “NYC Chihuahua,” “NYC Maltese,” “NYC

Morkies,” “NYC Pomeranian,” “NYC Poodles,” “NYC Shih Tzu,” and “NYC Yorkies.”<sup>1</sup> Respondents have used a variety of names for their businesses, only a few of which they have registered with the New York State Department of State (hereinafter “Department of State”).<sup>2</sup> Respondents advertise dogs for sale at 8002 17th Avenue and 1690 80th Street, Brooklyn, in the New York Post, and on multiple websites and social media platforms. Respondent Philip Reinhardt spoke with an undercover OAG investigator regarding the availability of a dog for purchase and sent the investigator seven photographs, a link to one of Respondents’ Instagram pages to view other dogs, pricing information, and store hours during which the investigator could visit the dogs for sale. Respondent Philip Reinhardt also informed the OAG investigator that another shipment of dogs would arrive soon. In response to the OAG investigator’s question about taking home a puppy the same day he visits the store, Respondent Philip Reinhardt responded, “Yes the puppy can be taken home the same day as you come down[. . .]No appointment needed we’re here everyday after 11:00 a.m.” Respondents have also attempted to circumvent the Puppy Mill Pipeline Act by fraudulently representing they collaborate with a non-profit organization to facilitate dog adoptions.

## PARTIES AND JURISDICTION

4. Petitioner is the People of the State of New York, by Letitia James, Attorney

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<sup>1</sup> The building located at the corner of 17th Avenue and 80th Street in Brooklyn (block 6283, lot 42) has two addresses: 8002 17th Avenue, Brooklyn, NY 11214 and 1690 80th Street, Brooklyn, NY 11214. The building is owned by Respondents Fidelina Estevez and Philip Reinhardt and contains their place of business and residence. The New York City Department of Housing Preservation and Development’s online database states there are two dwelling units in the building. See affirmation of OAG Investigator Lorenzo Hernandez, dated June 11, 2026 (hereinafter “Hernandez Aff.”), a copy of which is annexed here, at ¶ 20, Ex. 10.

<sup>2</sup> Department of State has no record of a business entity named Puppy Boutique and Puppy Petite Inc. was dissolved by proclamation in 2012. Quality Canines Inc. *is* registered with the Department of State as a domestic business corporation. Neither “Maxies Babies,” “Maxine’s Puppies,” “NYC Bichpoo,” “NYC Chihuahua,” “NYC Maltese,” “NYC Morkies,” “NYC Pomeranian,” “NYC Poodles,” “NYC Shih Tzu,” nor “NYC Yorkies” are registered with the Department of State as a business entity. See affirmation of Assistant Attorney General Deborah Diamant, dated June 15, 2026, a copy of which is annexed here, at ¶¶ 4-7, Ex. 1-12; Hernandez Aff. at ¶ 27, Ex. 5.

General of the State of New York, and brings this special summary proceeding pursuant to Article 4 of the New York Civil Practice Laws and Rules (“C.P.L.R.”), in addition to the General Business Law, Executive Law, and the Administrative Code of the City of New York.

5. This Court has jurisdiction pursuant to Gen. Bus. §§ 350-d and 755(1), and Exec. Law § 63(12), under which the OAG, on behalf of the People of the State of New York, is empowered to seek injunctive relief and costs when any person or entity has engaged in repeated fraudulent or illegal acts or has otherwise engaged in persistent fraud or illegality in the conduct of its business.

6. Respondent Quality Canines Inc. is a domestic business corporation organized in the State of New York that operates a retail pet shop at 8002 17th Avenue, Brooklyn, NY 11214. The address Quality Canines Inc. has had on file with the Department of State for the Secretary of State to mail process since 2015 is 1835 Bay Ridge Avenue, Brooklyn, NY 11204. However, Quality Canines Inc. represented to Capital One Bank that same year that its address is 8002 17th Avenue, Brooklyn, NY 11214, which is also the address that appears on Quality Canines’ Capital One Bank statements and the checks it writes. Quality Canines Inc. represented to Capital One Bank that its president is Respondent Maria Ramirez and its vice president is Respondent Fidelina Estevez. See affirmation of OAG Investigator Lorenzo Hernandez, dated June 11, 2026 (hereinafter “Hernandez Aff.”), a copy of which is annexed here, at ¶ 27, Ex. 15-16. Quality Canines Inc. has no Assumed Names on file with the Department of State and does business as “Puppy Boutique,” “Puppy Petite,” “Maxies Babies,” “Maxine's Puppies,” “NYC Bichpoo,” “NYC Chihuahua,” “NYC Maltese,” “NYC Morkies,” “NYC Pomeranian,” “NYC Poodles,” “NYC Shih Tzu,” and “NYC Yorkies.”

7. Respondent Puppy Petite Inc. is a dissolved domestic business corporation organized in the State of New York that continues to operate a retail pet shop at 8002 17th Avenue, Brooklyn, NY 11214. Puppy Petite Inc. was dissolved by the Department of State by proclamation on April 25, 2012. Since 2004, 8002 17th Avenue, Brooklyn, NY 11214 has been the address listed for the Secretary of State to mail process for Puppy Petite Inc. Puppy Petite Inc. has no Assumed Names on file with the Department of State and does business as “Puppy Boutique,” “Puppy Petite,” “Maxies Babies,” “Maxine's Puppies,” “NYC Bichpoo,” “NYC Chihuahua,” “NYC Maltese,” “NYC Morkies,” “NYC Pomeranian,” “NYC Poodles,” “NYC Shih Tzu,” and “NYC Yorkies.” See affirmation of Assistant Attorney General Deborah Diamant, dated June 15, 2026 (hereinafter “Diamant Aff.”), a copy of which is annexed here, at ¶ 5, Ex. 2.

8. Respondent CNS Animal Rescue Incorporated is a domestic not-for-profit corporation organized in the State of New York that represents its purpose “is to rescue puppies and dogs for rehoming with qualified families or individuals.” Hernandez Aff. at ¶ 23, Ex. 14. The address CNS Animal Rescue Incorporated has on file with the Department of State for the Secretary of State to mail process is 1690 80th Street, Brooklyn, NY 11214. Its officers are Respondents Estevez, Noah Reinhardt, and Philip Reinhardt. Id. at ¶ 24, Ex. 11, 14. CNS Animal Rescue Incorporated has never been registered with the New York State Department of Agriculture and Markets as a shelter rescue organization, and it is not a licensed shelter organization permitted to facilitate dog and cat adoptions in New York State. See affirmation of Department of Agriculture and Markets veterinarian Dr. Bridgette Kennedy, DVM, dated June 10, 2026 (hereinafter “Kennedy Aff.”), a copy of which is annexed here, at ¶ 20. Upon information and belief, CNS Animal Rescue Incorporated also does business as “Puppy Boutique,” “Puppy Petite,” “Maxies

Babies,” “Maxine's Puppies,” “NYC Bichpoo,” “NYC Chihuahua,” “NYC Maltese,” “NYC Morkies,” “NYC Pomeranian,” “NYC Poodles,” “NYC Shih Tzu,” and “NYC Yorkies.”

9. Respondent N&M Animal Rescue, Inc. is a domestic not-for-profit corporation organized in the State of New York. The address N&M Animal Rescue, Inc. has on file with the Department of State for the Secretary of State to mail process is 1690 80th Street, Brooklyn, NY 11214. Hernandez Aff. at ¶ 22, Ex. 12. Its directors are Respondents Philip Reinhardt, Noah Reinhardt, and Lesier Ramirez Estevez. Id. at ¶ 24, Ex. 12. N&M Animal Rescue, Inc. has never been registered with the New York State Department of Agriculture and Markets as a shelter rescue organization, and it is not a licensed shelter organization permitted to facilitate dog and cat adoptions in New York State. Kennedy Aff. at ¶ 21. Upon information and belief, N&M Animal Rescue, Inc., also does business as “Puppy Boutique,” “Puppy Petite,” “Maxies Babies,” “Maxine's Puppies,” “NYC Bichpoo,” “NYC Chihuahua,” “NYC Maltese,” “NYC Morkies,” “NYC Pomeranian,” “NYC Poodles,” “NYC Shih Tzu,” and “NYC Yorkies.”

10. Respondent Fidelina Estevez is a natural person who, upon information and belief, resides at 1690 80th Street, Apt. 1, Brooklyn, NY 11214. Respondent Fidelina Estevez operates the retail pet shops located at the building with addresses 8002 17th Avenue, Brooklyn, NY 11214 and 1690 80th Street, Brooklyn, NY 11214, and does business as “Puppy Boutique,” “Puppy Petite,” “Maxies Babies,” “Maxine's Puppies,” “NYC Bichpoo,” “NYC Chihuahua,” “NYC Maltese,” “NYC Morkies,” “NYC Pomeranian,” “NYC Poodles,” “NYC Shih Tzu,” and “NYC Yorkies.” Respondent Fidelina Estevez is the vice president of Quality Canines Inc. and the secretary of CNS Animal Rescue Incorporated. Hernandez Aff. at ¶¶ 24, 27, Ex. 14, 16.

11. Respondent Philip Reinhardt is a natural person who, upon information and belief, resides at 1690 80th Street, Apt. 1, Brooklyn, NY 11214. Respondent Philip Reinhardt is the

treasurer of CNS Animal Rescue Incorporated and a director of N&M Animal Rescue, Inc. Id. at ¶ 24, Ex. 11-14. Respondent Philip Reinhardt operates the retail pet shops located at the building with addresses 8002 17th Avenue, Brooklyn, NY 11214 and 1690 80th Street, Brooklyn, NY 11214, and does business as “Puppy Boutique,” “Puppy Petite,” “Maxies Babies,” “Maxine's Puppies,” “NYC Bichpoo,” “NYC Chihuahua,” “NYC Maltese,” “NYC Morkies,” “NYC Pomeranian,” “NYC Poodles,” “NYC Shih Tzu,” and “NYC Yorkies.”

12. Respondent Maria Ramirez is a natural person who, upon information and belief, resides at 1742 80th Street, Apt. 2B, Brooklyn, NY 11214. Respondent Maria Ramirez is the president of Quality Canines Inc. Id. at ¶ 27, Ex. 16. Respondent Maria Ramirez operates the retail pet shops located at the building with addresses 8002 17th Avenue, Brooklyn, NY 11214 and 1690 80th Street, Brooklyn, NY 11214, and does business as “Puppy Boutique,” “Puppy Petite,” “Maxies Babies,” “Maxine's Puppies,” “NYC Bichpoo,” “NYC Chihuahua,” “NYC Maltese,” “NYC Morkies,” “NYC Pomeranian,” “NYC Poodles,” “NYC Shih Tzu,” and “NYC Yorkies.”

13. Respondent Noah Reinhardt is a natural person who, upon information and belief, resides at 1690 80th Street, Brooklyn, NY 11214. Respondent Noah Reinhardt is the president of CNS Animal Rescue Incorporated and a director of N&M Animal Rescue, Inc. Id. at ¶ 24, Ex. 11-14. Upon information and belief, Respondent Noah Reinhardt operates the retail pet shops located at the building with addresses 8002 17th Avenue, Brooklyn, NY 11214 and 1690 80th Street, Brooklyn, NY 11214, and does business as “Puppy Boutique,” “Puppy Petite,” “Maxies Babies,” “Maxine's Puppies,” “NYC Bichpoo,” “NYC Chihuahua,” “NYC Maltese,” “NYC Morkies,” “NYC Pomeranian,” “NYC Poodles,” “NYC Shih Tzu,” and “NYC Yorkies.”

14. Respondent Lesier Ramirez Estevez is a natural person who, upon information and belief, resides at 1742 80th Street, Apt. 2B, Brooklyn, NY 11214 and 212 S C Street, Lake Worth

Beach, FL 33460. Respondent Ramirez Estevez is a director of N&M Animal Rescue, Inc. Id. at ¶ 24, Ex. 12. Upon information and belief, Respondent Ramirez Estevez operates the retail pet shops located at the building with addresses 8002 17th Avenue, Brooklyn, NY 11214 and 1690 80th Street, Brooklyn, NY 11214, and does business as “Puppy Boutique,” “Puppy Petite,” “Maxies Babies,” “Maxine's Puppies,” “NYC Bichpoo,” “NYC Chihuahua,” “NYC Maltese,” “NYC Morkies,” “NYC Pomeranian,” “NYC Poodles,” “NYC Shih Tzu,” and “NYC Yorkies.”

15. Petitioner has complied with the statutory notice requirements of Gen. Bus. § 350-c. Diamant Aff. at ¶ 11, Ex. 16.

### FACTS

16. Upon information and belief, Respondents have operated retail pet shops at the building known as 8002 17th Avenue and 1690 80th Street in Brooklyn since at least 2002, the same year the New York State Department of Agriculture and Markets (hereinafter “Department of Agriculture and Markets” or “NYSDAM”) issued a pet dealer license to “Puppy Boutique,” which Respondent Fidelina Estevez renewed annually thereafter.<sup>3</sup> Kennedy Aff. at ¶¶ 7-8.

17. On February 1, 2024, the Department of Agriculture and Markets sent via first-class mail a pet dealer license renewal application addressed to Puppy Boutique, 8002 17th Avenue, Brooklyn, NY 11214 that included a letter reminding Respondents that the Puppy Mill Pipeline Act would go into effect on December 15, 2024, and ban the sale of dogs, cats, and rabbits at retail pet shops. The letter also informed Respondents that “[n]o licenses for brick and mortar retail pet stores will be issued or renewed by the NYSDAM after December 15, 2024. Licenses that expire after December 15, 2024 will no longer be valid.” Id. at ¶ 9.

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<sup>3</sup> As per footnote 2 above, the Department of State has no entity filing information for any business entity named Puppy Boutique; however, for ease of reference to the storefront located at the building known as 8002 17th Avenue and 1690 80th Street, Brooklyn, NY 11214, this petition will refer to the storefront as Puppy Boutique unless otherwise stated, which, upon information and belief, is the business name most commonly used by Respondents.

18. On or about November 15, 2024, Petitioner mailed a letter to Puppy Boutique reminding Respondents that that the Puppy Mill Pipeline Act would be in effect as of December 15, 2024, and that they would no longer be permitted to sell dogs, cats, and rabbits under New York State law. Petitioner also reminded Respondents that any dogs, cats, or rabbits sold before December 15, 2024, could not remain on the premises after the law went into effect. See Diamant Aff. at ¶ 8, Ex. 13.

19. Upon learning that Respondents continued to advertise puppies for sale on Puppy Boutique's website after the December 15, 2024, effective date of the Puppy Mill Pipeline Act, Petitioner mailed a cease-and-desist letter with a compliance certification on January 3, 2025, to Puppy Boutique, which stated,

It has come to the attention of the Office of the Attorney General that you are in violation of New York State General Business Law ("GBL") Chapter 20, Article 35-D, § 753-F, ("the Puppy Mill Pipeline Act"). You are hereby directed to immediately comply with the provisions of the Puppy Mill Pipeline Act, to cease the retail sale of qualifying animals, and to provide certification of full compliance on the attached form no later than 10-days from your receipt of this correspondence. A failure to do so may result in the Office of the Attorney General taking enforcement action against you. You are reminded that effective December 15, 2024, you no longer hold a New York State Pet Dealer license and may not sell dogs, cats, and/or rabbits to New York based purchasers in stores, online, or by other means.

Id. at ¶ 9, Ex. 14.

20. The cease-and-desist letter was delivered to Puppy Boutique at 8002 17th Avenue, Brooklyn, New York 11214, on January 8, 2025. Petitioner thereafter received an executed compliance certification that Respondent Fidelina Estevez signed on January 9, 2025. Id. at ¶ 10, Ex. 15.

2025 Investigation of Websites and Social Media

21. On March 28, 2025, an undercover OAG investigator, Lorenzo Hernandez, visited Puppy Boutique's website located at [thepuppyboutique.com](http://thepuppyboutique.com), which stated on the main webpage, "Adorable Puppies For Sale Near Me[.] Please call or text us at 718-306-4136[.] Please email us at [Puppyboutique@aol.com](mailto:Puppyboutique@aol.com)[.] 8002 17th Avenue, Brooklyn NY 11214[.]" The main webpage also stated, "Sorry, we do not ship our babies. They must be picked up in person. Email us for current prices or more information on our puppies for sale." Hernandez Aff. at ¶ 4, Ex. 1-2.

22. Inv. Hernandez also viewed on March 28, 2025, the Instagram account [@puppyboutique.nyc](https://www.instagram.com/puppyboutique.nyc), which had a biography stating, "Pet Breeder in Brooklyn New York specializing in toy and teacup breeds over 28 years. Yorkies, Maltese, Poodles,[ ]Shih tzu. Call or text 718-306-4136[.]" The account had 288 photos and videos of various breeds of puppies. Id. at ¶ 7, Ex. 3. One of the two links in [@puppyboutique.nyc](https://www.instagram.com/puppyboutique.nyc)'s biography was for [puppypetite.com](http://puppypetite.com), which included the same phone number and address as listed on [thepuppyboutique.com](http://thepuppyboutique.com) for Puppy Boutique: 718-306-4136 and 8002 17th Ave, Brooklyn NY 11214. Id. at ¶ 8, Ex. 4.

23. On April 1, 2025, Inv. Hernandez found two posts dated December 26, 2024, on the Instagram account [@puppyboutique.nyc](https://www.instagram.com/puppyboutique.nyc) that advertised puppies for sale. The first post included a photograph of a puppy with a caption that stated, "Male Yorkie for the new year 718-306-4136 call or text from [sic] more information[.]" The second post included a photograph of a puppy with a caption that stated, "Female Yorkie puppy available for a new home please call or text 718-306-4136[.]" Id. at ¶ 9, Ex. 5.

#### Inv. Hernandez's Telephone and Email Communication with Puppy Boutique

24. On June 20, 2025, OAG Inv. Hernandez made a covert phone call to the phone number listed on [thepuppyboutique.com](http://thepuppyboutique.com), 718-306-4136, and inquired about purchasing a Maltese puppy. Inv. Hernandez spoke with an individual who stated his name was "Philip," who, in

response to Inv. Hernandez's inquiry, responded, "Right now we have four [Maltese Puppies]. We have three boys and a girl. And then next week we've got a bunch of them on Thursday. So, there's four right now . . . There's also Maltipoos; we have those, too . . . And, uh, yeah, next week we'll have the rest." Id. at ¶¶ 10-11, Ex. 6.

25. During the phone call, Inv. Hernandez asked about Maltese pricing, and Philip responded that male puppies start at \$750 and female puppies start at \$850. Inv. Hernandez asked how to view the dogs, and Philip stated he would text Inv. Hernandez an Instagram link so that he could "see some of the videos and stuff" and additional photographs. Inv. Hernandez asked how to purchase a puppy after reviewing the Instagram page, to which Philip responded by providing him the store hours and assuring him, "We'll get you a nice one." Id. at ¶¶ 12-14.

26. On June 20, 2025, Philip sent Inv. Hernandez a series of text messages from 718-306-4136, including seven photographs; a link to an Instagram account with handle @puppyboutique2025; a link to nycmaltese.com; and a message stating, "Thank you . . . let me know when you're ready for a baby Maltese appreciate it[.]" Id. at ¶ 15, Ex. 7-8.

27. Inv. Hernandez expressed interest in the dog in the first photograph he received, and Philip sent him a text message stating, "It's a male at \$850[.]" Id. at ¶ 16. In response to Inv. Hernandez's questions regarding how soon he could obtain the dog, Philip sent a text message stating, "Yes the puppy can be taken home the same day as you come down[.]" Id. at ¶ 17.

28. After learning no appointment was needed to visit the dog, Inv. Hernandez confirmed the address for Puppy Boutique by asking if it is located at 8002 17th Avenue, Brooklyn, or 1690 80th Street, Brooklyn. In response, Inv. Hernandez received a text message from Philip stating, "It's the same building[.]" Id. at ¶ 18.

29. On June 22, 2025, Inv. Hernandez visited the Instagram link he received from Philip via text, which was for an account with the handle @puppyboutique2025. The biography for @puppyboutique2025 stated, “specializing in toy and teacup puppies for 30 years in the same location Brooklyn New York please call or text 718-306-4136 with any questions[.]” The account had 269 posts of various puppies. Id. at ¶ 19, Ex. 9.

30. Upon information and belief, the person who identified himself as Philip to Inv. Hernandez is Respondent Philip Reinhardt.

#### Miley’s Safe Haven

31. On June 27, 2025, after New York City Department of Health and Mental Hygiene (hereinafter “DOHMH”) inspectors observed Respondents selling or offering dogs for sale at 8002 17th Avenue, Brooklyn, NY 11214, DOHMH Chief of Code Enforcement Bernard Zicherman served a DOHMH Order of the Commissioner, dated June 26, 2025, on Puppy Boutique/Puppy Petite Inc. by mailing a copy of the Order to 8002 17 Avenue, AKA 1690 80 Street, Brooklyn, NY 11214. The Order of the Commissioner ordered Puppy Boutique/Puppy Petite Inc. to “immediately cease and desist selling dogs, cats, rabbits, and guinea pigs[.]” See affirmation of DOHMH Chief of Code Enforcement Bernard Zicherman, dated June 12, 2026 (hereinafter “Zicherman Aff.”), a copy of which is annexed here, at ¶¶ 4-6, Ex. 1.

32. On July 3, 2025, Mr. Zicherman received an email from puppyboutique8002@yahoo.com, which he knew to be an email address used by Respondent Philip Reinhardt, with the subject line, “from puppy boutique miley's safe haven information[.]” Attached to the email message was a PDF titled “Miley’s Safe Haven Information[.]” which contained a letter, dated May 7, 2025, directed to “To Whom It May Concern,” from Arthur Battle, identified in the letter as the “Founder, Miley’s Safe Haven.” Id. at ¶ 7, Ex. 2.

33. The letter from Arthur Battle stated,

This letter serves as formal acknowledgement that \*Miley's Safe Haven\*, a registered dog rescue, will be showcasing adoptable dogs and puppies in collaboration with \*Puppy Boutique\*, a pet store located in New York City.

Through this partnership, our rescue dogs will have the opportunity to gain visibility and connect with potential adopters in a safe and welcoming environment. This collaboration supports our shared mission to place pets into loving, permanent homes while promoting responsible pet ownership.

We are excited about this opportunity and look forward to working together to find forever homes for our rescues.

If you have any questions or require further information, please feel free to contact us at 716-346-3030.

Id.

34. After confirming that Miley's Safe Haven was not on the Department of Agriculture and Markets' searchable list of registered rescue organizations, Mr. Zicherman replied to Respondent Philip Reinhardt's email on July 7, 2025, and stated,

Miley's Safe Haven Ltd. Has been adopting out pets through Puppy Petite in 8002 17th Ave in Brooklyn. Miley's is not a registered rescue group . . . . Please give Miley's the attached Shelter Rescue Application and have them register with NYS AgMkts. You are not authorized to host animals for adoption as provided by Miley's Safe Haven as they are not registered with NYS Agmks.

Mr. Zicherman attached a PDF of the Department of Agriculture and Markets' Shelter Rescue Registry Application to his email. He also forwarded his correspondence with Respondent Philip Reinhardt to Sarah Dunne, who was then the Pet Dealer and Shelter Rescue Program Manager and is now the Pet Dealer and Rescue Registry Program Manager for the Department of Agriculture and Markets. Id. at ¶¶ 9-10, Ex. 3; Kennedy Aff. at ¶ 3.

35. On July 7, 2025, Ms. Dunne sent a letter to Miley's Safe Haven's Arthur Battle, that stated,

It has come to the attention of the New York State Department of Agriculture and Markets that you are engaged in the sale and/or adoption of dogs and/or cats to the public. The Department may have reports of actual sales/adoptions or observed advertisements.

The Department inspects and licenses breeders who sell more than 25 dogs and/or cats per year that are born and raised on the breeder's residential premise.

**Animal shelters, rescue organizations, and other non-profit entities that offer animal adoptions in New York are required to register with the Department.**

In order to avoid civil penalties, you must cease sales and/or adoptions or apply as a Pet Dealer or Register as a Rescue. Your application must be fully completed with an original signature, contain all required documentation, and be accompanied by the prescribed fee before your permit to operate may be issued. Should the Department not receive an application by two (2) weeks from the date of this letter and you [are] found to be operating without a valid license or registration issued by the Department, you risk civil penalties of no less than \$300 per violation.

Kennedy Aff. at ¶ 11, Ex. 2 (emphasis in original).

36. The Department of Agriculture and Markets received 41 certificates of veterinary inspection (hereinafter "CVIs")<sup>4</sup> for a total of 174 puppies transported from Missouri for delivery to Miley's Safe Haven at 2153 Union Road, West Seneca, NY 14224 between June 17, 2025, and August 22, 2025. Id. at ¶ 12, Ex. 3.

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<sup>4</sup> With few exceptions, anyone who wants to import a dog or cat from another state in the United States into New York State must have the animal examined by a veterinarian 30 days or less prior to the animal's arrival in New York State and obtain from the veterinarian a certificate of veterinary inspection ("CVI") or health certificate. The CVI or health certificate should state that the examination revealed no clinical evidence of an infectious or communicable disease.

Department of Agriculture and Markets' regulations require that a copy of the CVI or health certificate be mailed to the Department of Agriculture and Markets in advance of the animal's arrival into New York State. However, the Department of Agriculture and Markets prefers to receive these forms in electronic format.

The exceptions that allow a dog or cat to be brought or shipped into New York State without obtaining a CVI or health certificate are (1) if the animal is staying in New York State for fewer than 30 days, (2) the animal is entering the state for exhibition purposes only, and (3) the animal is already a resident of New York State and is returning from out-of-state travel within one year, has proof of rabies vaccination, and, if a dog, a current dog license.

Despite the Department of Agriculture and Markets' regulations regarding importation of dogs and cats from other states into New York State, the Department of Agriculture and Markets is aware that they do not receive a copy of each CVI or health certificate that is issued for a dog or cat who enters the state. Therefore, the count of dogs transported from out of state on Miley's Safe Haven's behalf as represented by the CVIs attached to the affirmation of Dr. Bridgette Kennedy, DVM, as Exhibit 3 are likely an undercount. Kennedy Aff. at ¶ 12 n.1, Ex. 3.

37. On August 18, 2025, Ms. Dunne sent a final warning letter to Arthur Battle stating that Miley's Safe Haven was not permitted to offer dog and cat adoptions in New York without first registering with the Department of Agriculture and Markets. Id. at ¶ 13, Ex. 4.

38. To date, Miley's Safe Haven has submitted two Shelter Rescue Registry Applications but neither was approved because Miley's Safe Haven's applications were incomplete. Miley's Safe Haven's first Shelter Rescue Registry Application was denied on September 3, 2025, and Ms. Dunne sent Mr. Battle both an email and letter explaining the application was denied due to the application missing an IRS tax exemption determination letter and New York State Charities Bureau Registration number. Id. at ¶ 14, Ex. 5-6.

39. Department of Agriculture and Markets' Companion Animal Program Manager and veterinarian Dr. Kennedy believes that Miley's Safe Haven has not taken possession of the dogs listed on the CVIs received by her Department and the dogs are instead transported directly to Puppy Boutique at 8002 17th Avenue, Brooklyn, NY 11214. This belief is based upon the representation in Miley's Safe Haven's September 3, 2025, Shelter Rescue Registry Application in the section that asks for a description of the facilities in which animals previously taken in, adopted, or otherwise transferred are housed, which stated, "The facility where the puppies were [sic] held and show cased [sic] was a former pet [sic] store and was already set up with all puppies needed." The application also stated Miley's Safe Haven had already taken in 83 dogs and adopted out 83 dogs. Id. at ¶ 15, Ex. 5.

40. The 174 dogs listed on the CVIs received by the Department of Agriculture and Markets were all puppies when they were transported to New York State. Dr. Kennedy knows of no legitimate rescue group who only adopts out puppies. The majority of rescue groups working in New York State source dogs from local "kill" shelters; overcrowded, out-of-state shelters; and

people needing to rehome their dogs, often due to reasons related to housing, health, and finances. While some of the dogs assisted by these rescue organizations are puppies, many of them are adults. Id. at ¶ 16.

41. Miley's Safe Haven's Shelter Rescue Registry Application was never approved by the Department of Agriculture and Markets. As of December 15, 2025, animal rescue organizations must be licensed in New York State in order to facilitate dog and cat adoptions. Miley's Safe Haven has not submitted a Shelter Rescue License Application to the Department of Agriculture and Markets. Id. at ¶ 15 n.2.

Respondents' Block, Inc./Square Point of Sale Records and Capital One Bank Records

42. Records show that Puppy Boutique uses, among other payment methods, Square to accept payments from customers. Puppy Boutique's Square account is named "PP," which, upon information and belief, is an abbreviation for Puppy Petite. The business name on the account is "Puppy Petite" and the business address is listed as "8002 17th Ave, Brooklyn, NY 11214-2106[.]" The individual name associated with the account is Fidelina Estevez. Hernandez Aff. at ¶ 28; Exhibit 17.

43. A summary of successful payments processed through the "PP" Square account between December 14, 2025, and February 12, 2026, suggests that 373 dogs were sold during the approximately two months period. Each of the payments processed by Square include a description created by the account holder, i.e., Respondent Fidelina Estevez or someone acting on her behalf. Descriptions include various combinations of the following terms:

- Puppy (Regular) × 1
- Custom Amount × 1
- Neutered (Regular) × 1
- Microchip (Regular) × 1

Puppy Package (Regular) × 1

Puppy Package (Regular) × 2

Bag (Regular) × 1

Id. at ¶ 29.

44. Upon information and belief, “Puppy (Regular) × 1” and “Custom Amount × 1” each represent one dog sold. These terms are mentioned a total of 373 times in successful Square transactions. Upon information and belief, at least 373 dogs were sold via Square between December 14, 2025, and February 12, 2026. Transactions in which the description is either only “Puppy (Regular) × 1” or “Custom Amount × 1” had an average sales price of approximately \$1,000.00. Id. at ¶¶ 30-31.

45. Capital One Bank records for account no. XXXXXX1537 list the account name as “Puppy Petite Inc.” and checks drawn on the account list the account name as either “Puppy Petite Inc.” or “Puppy Boutique Inc.” and bear Respondent Fidelina Estevez’s signature. Many of these checks were paid to the order of and endorsed by known puppy breeders; for example, breeders listed as consignors on CVIs with consignee Miley’s Safe Haven are some of the payees on the checks. The Capital One Bank records also show that Respondents regularly purchased large quantities of dog food and frequently paid a company named “DLC” for the “Delivery of pups.” Id. at ¶ 32, Ex. 18.

46. A January 1 to January 30, 2026, Capital One Bank statement for account no. XXXXXX1537 contained six wire transfers to known breeders, including Leona Wienhaus, Karen Reiff, Kathleen Martin, Jody McCloud, and Joe and Jackie Bowyer, and multiple ACH payments with memos such as “invoice for puppies[,]” “invoice for pups[,]” “payment puppies invoice[,]” and “puppies invoice[,]” implying the payments were for dogs purchased by Respondents. Id. at ¶ 33, Ex. 19.

47. Capital One Bank records for Respondent Quality Canines Inc. (account no. XXXXXX0198) demonstrate that, of the approximately 100 non-payroll checks reviewed by the OAG and dated between December 15, 2024, and January 12, 2026, at least 83 checks were made payable to and endorsed by known breeders, some of whom appear on the Horrible Hundred List<sup>5</sup> issued annually by Humane World for Animals (formerly Humane Society of the United States), such as Kevin Harrison and Elmer Troyer. *Id.* at ¶ 34, Ex. 16.

48. Upon information and belief, Respondents have used multiple bank accounts to purchase dogs from breeders and then sold those dogs at 8002 17th Avenue and 1690 80th Street, Brooklyn, since the Puppy Mill Pipeline Act went into effect on December 15, 2024.

New York Post Print Advertising

49. Respondents regularly advertise dogs for sale in the print edition of the New York Post. The August 20, 2025, print edition of the New York Post included three advertisements placed by the Respondents. Each advertisement stated, “Call 718-306-4136[,]” which is the telephone number listed on thepuppyboutique.com, puppypetite.com, and the @puppyboutique.nyc and @puppypetite2025 Instagram accounts. It is also the telephone number Inv. Hernandez called and texted with on June 20, 2025. *Id.* at ¶ 36, Ex. 20.

50. The New York Post print edition classifieds are archived at [nypost.com/classifieds](https://nypost.com/classifieds). Between February 22, 2026, and June 9, 2026, each archived print edition classifieds, except for

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<sup>5</sup> “The Horrible Hundred report is a list of known, problematic puppy breeding and/or puppy brokering facilities . . . [Human World for Animals] provide[s] this updated report annually, not as a comprehensive inventory, but as an effort to inform the public about common, recurring problems at puppy mills. The information in this bad dog breeders list demonstrates the scope of the puppy mill problem in America today, with specific examples of the types of violations that researchers have found at such facilities, to warn consumers about the inhumane conditions that so many puppy buyers inadvertently support.” *Horrible Hundred*, HUMANE WORLD FOR ANIMALS, <https://www.humaneworld.org/en/issue/horrible-hundred>.

June 3, 2026, archived classifieds, included three advertisements offering dogs for sale that list Puppy Boutique's 718-306-4136 telephone number. Id. at ¶ 37, Ex. 21.

Signage at 8002 17th Avenue, Brooklyn, NY 11214

51. Photographs taken of the exterior of 8002 17th Avenue, Brooklyn, NY 11214 and 1690 80th Street, Brooklyn, NY 11214 on April 1 and 7, 2026, show exterior signage on both streets advertising puppies. Two large signs above the windows and door state, "PUPPIES[.]" "QUALITY HOME BRED PUPPIES[.]" "SPECIALIZING IN T-CUP & TOY BREEDS[.]" and "(718) 306-4136." Each window (two on 17th Avenue and one on 80th Street) displays a sign stating, "PUPPIES[.]" A small sign appears to the left of the door on 17th Avenue that states, "FOR INFORMATION ON PUPPIES – CALL – 718-306-4136[.]" Id. at ¶ 38, Ex. 22.

2026 Investigation of Websites and Social Media

52. Inv. Hernandez revisited thepuppyboutique.com on June 9, 2026, and observed that the website is substantially like it was in March 2025; however, there are now more breed-specific pages. For example, there are now three Maltese pages: purebred, teacup, and toy. The three pages use the same six photographs and state either "Purebred Maltese Puppies For Sale[.]" "Teacup Maltese Puppies For Sale[.]" or "Toy Maltese Puppies For Sale[.]" Id. at ¶ 39, Ex. 23.

53. Inv. Hernandez also observed on June 9, 2026, that no substantial changes had been made to pupppetite.com, and dogs continue to be advertised for sale. Respondents still claim on the pupppetite.com main webpage to be a licensed pet dealer despite their license expiring as of December 15, 2024. Id. at ¶ 40, Ex. 24.

54. Inv. Hernandez also revisited nycmaltese.com on June 9, 2026, and observed that the website had been redesigned, but the address is still listed as 1690 80th Street, Brooklyn, NY 11214 and the telephone number (347-355-8347) and email address (mia8758@aol.com) remain

the same. Nycmaltese.com states, “Loving, Home-raised puppies available now from an experienced Brooklyn breeder . . . With over 25 years of experience, NYC Maltese specializes in raising high-quality Maltese puppies for sale in NYC.” Id. at ¶ 41, Ex. 25.

55. Six other breed-specific websites with designs similar to nycmaltese.com’s appearance in June 2025, also list 1690 80th Street, Brooklyn, NY 11214 as each respective store’s address as well as the same telephone number (347-355-8347) and email address (mia8758@aol.com). They include nycchihuahuas.com, nycmorkies.com, nycpomeranian.com, nycpoodles.com, nycshihtzu.com, and nycyorkies.com. Id. at ¶ 42, Ex. 26. Inv. Hernandez visited nycbichpoo.com, which also lists 1690 80th Street, Brooklyn, NY 11214 as its address, on April 1, 2026, but the website’s contents appeared to have been deleted when he visited it again on June 9, 2026. Id., Ex. 27.

56. An Accurint search for the phone number and email address that appears on each of the websites listed in paragraph 55 above (347-355-8347 and Mia8758@aol.com, which is the same email address listed for Respondent Noah Reinhardt on CNS Animal Rescue’s registration statement for charitable organizations, as per paragraph 8 above) revealed that the phone number is associated with a prepaid MetroPCS cell phone plan and that mia8758@aol.com is associated with Philip J. Reinhardt and 1690 80th Street, Apt. 1, Brooklyn, NY 11214. Id. at ¶ 43.

57. Nycyorkie.com, which is the website for Maxies Babies, states its address is also 1690 80th Street, Brooklyn, NY 11214. The website lists Maxies Babies’ telephone number as 718-614-3968. An Accurint search for 718-614-3968 revealed it is associated with Respondent Fidelina Estevez. Id. at ¶ 44, Ex. 28.

58. On June 9, 2026, Inv. Hernandez located another Puppy Boutique Instagram account, @puppy.boutique\_nyc. It did not contain any posts, but the biography stated, “We have

been breeding and selling puppies for over 25 years now, and specialist it [*sic*] toy breeds Yorkie, shih tzu, Maltese,[. . .]” and included a link to puppypetite.com. Id. at ¶ 46, Ex. 29.

59. Inv. Hernandez located two TikTok accounts associated with Puppy Boutique and Puppy Petite. TikTok account puppyboutique\_nyc’s biography states it is “Specializing in Toy and Teacup” and is located at “1690 80th Street Brooklyn NY[.]” Visitors are directed to “Call or text 718 306 4136” and puppypetite.com is listed. Id. at ¶ 47, Ex. 30. TikTok account FurryBoutique2008 states it is “Specializing in toy and teacup breeds” and is located at “1690 80th St Brooklyn NY[.]” Visitors are directed to “Call or text 718-306-4136[.]” Id., Ex. 31.

Summary of Entities Located at Block 6283, Lot 42

BUSINESS/ WEBSITE NAME	WEBSITE	STREET ADDRESS	TELEPHONE	EMAIL	REGISTERED WITH DOS? <sup>6</sup>
Quality Canines Inc.	unknown	8002 17th Ave.	718-234-0433	unknown	Yes (domestic business corporation)
Puppy Petite Inc.	puppypetite.com	8002 17th Ave.	718-306-4136	puppypetite@aol.com	Dissolved by proclamation in 2012
Puppy Petite	nycbichpoo.com	1690 80th St.	347-355-8347	mia8758@aol.com	Dissolved by proclamation in 2012
Puppy Boutique	thepuppyboutique.com	8002 17th Ave.	718-306-4136	puppyboutique@aol.com	No
NYC Yorkies	nycyorkies.com	1690 80th St.	347-355-8347	mia8758@aol.com	No
NYC Shih Tzu	nycshihtzu.com	1690 80th St.	347-355-8347	mia8758@aol.com	No
NYC Poodles	nycpoodles.com	1690 80th St.	347-355-8347	mia8758@aol.com	No
NYC Pomeranian	nycpomeranian.com	1690 80th St.	347-355-8347	mia8758@aol.com	No
NYC Morkies	nycmorkies.com	1690 80th St.	347-355-8347	mia8758@aol.com	No
NYC Maltese	nycmaltese.com	1690 80th St.	347-355-8347	mia8758@aol.com	No
NYC Chihuahua	nycchihuahuas.com	1690 80th St.	347-355-8347	mia8758@aol.com	No

<sup>6</sup> See Diamant Aff. at ¶¶ 4-7, Ex. 1-12 (certified copies of Department of State Certificates of Status for all entities not registered with the Department of State or that were dissolved by proclamation).

NYC Bichpoo	nycbichpoo.com	1690 80th St.	347-355-8347	mia8758@aol.com	No
N&M Animal Rescue, Inc.	unknown	1690 80th St.	unknown	unknown	Yes (domestic not-for-profit corporation)
Maxine's Puppies	unknown	1690 80th St.	718-614-3968	unknown	No
Maxies Babies	nycyorkie.com	1690 80th St.	718-614-3968	maxinesyorkie@aol.com	No
CNS Animal Rescue Incorporated	unknown	1690 80th St.	718-614-3968	mia8758@aol.com	Yes (domestic not-for-profit corporation)

60. Upon information and belief, Respondents have used a variety of business names, only a few of which have been registered with the Department of State, including not-for-profit corporations, to illegally sell dogs from 8002 17th Avenue and 1690 80th Street in Brooklyn. Upon information and belief, Respondents have attempted to avoid appearing on CVIs as consignees located at 8002 17th Avenue and 1690 80th Street, Brooklyn, but have nonetheless directed deliveries of dogs to these addresses since large volumes of dogs are sold by Respondents. Despite their efforts to hide their illegal activities, Department of Agriculture and Markets recently received a CVI issued February 2, 2026, for two puppies born in November 2025 that listed Puppy Boutique, 8002 17th Avenue, Brooklyn, NY 11214 as the “DESTINATION OF SHIPMENT” and “CONSIGNEE, NEW OWNER OF SHIPMENT[.]” Kennedy Aff. at ¶ 19, Ex. 7.

61. In violation of Gen. Bus. § 753-f, Exec. Law § 63(12), Administrative Code §§ 17-1702(a)-(b), and Gen. Bus. § 350, Respondents repeatedly and persistently engaged in fraudulent, deceptive, and illegal business practices by selling and/or offering for sale dogs, cats, rabbits, and/or guinea pigs on or after December 15, 2024, and in flagrant disregard of the multiple directives to stop their illegal activity.

**FIRST CAUSE OF ACTION  
PURSUANT TO GENERAL BUSINESS LAW § 753-f:  
VIOLATIONS OF THE PUPPY MILL PIPELINE ACT**

62. Petitioner repeats and realleges the paragraphs above as if fully set forth herein.

63. Gen. Bus. § 753-f states, “[a] retail pet shop as defined in this article shall not sell, lease, offer to lease, offer to sell, barter, auction, or otherwise transfer ownership of any dog, cat or rabbit.” Gen. Bus. § 753-f(1). A retail pet shop “means any for-profit place of business that sells or offers for sale animals to be kept as household pets, pet food or supplies, but shall not include breeders who sell or offer to sell directly to the consumer animals that are born and raised on the breeder's residential premises.” Gen. Bus. § 752(8).

64. The exemption in the General Business Law definition of retail pet shop for “home breeders” is inapplicable in New York City where “home breeding” or “backyard breeding” is not permitted. See Administrative Code § 17-1702(a). The New York City Administrative Code directs that “[a]nimals shall not be sold or held for sale in a dwelling in which a person lives or at any other location that is not licensed therefor.” Id. New York City has also banned retail pet shops from selling guinea pigs in addition to dogs, cats, and rabbits. Administrative Code § 17-1702(b).

65. Gen. Bus. § 755(1) authorizes the OAG to bring a special proceeding for injunctive relief and statutory penalties whenever Gen. Bus. § 753-f is violated.

66. As set forth above, Respondents repeatedly violated Gen. Bus. § 753-f by selling or offering to sell dogs, cats, or rabbits on or after December 15, 2024.

**SECOND CAUSE OF ACTION  
PURSUANT TO EXECUTIVE LAW § 63(12):  
REPEATED ILLEGALITY –  
VIOLATIONS OF GENERAL BUSINESS LAW § 753-f**

67. Petitioner repeats and realleges the paragraphs above as if fully set forth herein.

68. Exec. Law § 63(12) provides for relief upon petition by the OAG “whenever any person shall engage in repeated fraudulent or illegal acts or otherwise demonstrate persistent fraud or illegality in the carrying on, conducting or transaction of business.”

69. As set forth above, Respondents have violated Gen. Bus. § 753-f by repeatedly and persistently engaging in the illegal offering for sale or selling of dogs, cats, or rabbits.

70. Accordingly, Respondents have engaged in repeated and persistent illegality in violation of Exec. Law § 63(12).

**THIRD CAUSE OF ACTION  
PURSUANT TO EXECUTIVE LAW § 63(12):  
REPEATED ILLEGALITY –  
VIOLATIONS OF THE ADMINISTRATIVE CODE  
OF THE CITY OF NEW YORK § 17-1702(b)**

71. Petitioner repeats and realleges the paragraphs above as if fully set forth herein.

72. Administrative Code § 17-1702(b) states, “It shall be unlawful for any pet shop to display, offer for sale, deliver, barter, auction, give away, transfer, or sell any dog, cat, rabbit, or guinea pig.” Administrative Code § 17-1702(b). A pet shop “means a facility other than an animal shelter, as such term is defined in section 17-802, where live animals are sold, exchanged, bartered, or offered for sale as pet animals to the general public at retail for profit. Such definition shall not include duly incorporated humane societies dedicated to the care of unwanted animals that make such animals available for adoption, whether or not a fee for such adoption is charged.”

73. Exec. Law § 63(12) provides for relief upon petition by the OAG “whenever any person shall engage in repeated fraudulent or illegal acts or otherwise demonstrate persistent fraud or illegality in the carrying on, conducting or transaction of business[.]”

74. As set forth above, Respondents have repeatedly violated Administrative Code § 17-1702(b) by selling or offering to sell dogs, cats, rabbits, or guinea pigs.

75. Accordingly, Respondents have engaged in repeated and persistent illegality in violation of Exec. Law § 63(12).

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

**REPEATED ILLEGALITY –  
VIOLATIONS OF THE ADMINISTRATIVE CODE  
OF THE CITY OF NEW YORK § 17-1702(a)**

76. Petitioner repeats and realleges the paragraphs above as if fully set forth herein.
77. Administrative Code § 17-1702(a) states, “Animals shall not be sold or held for sale in a dwelling in which a person lives or at any other location that is not licensed therefor.”
78. Exec. Law § 63(12) provides for relief upon petition by the OAG “whenever any person shall engage in repeated fraudulent or illegal acts or otherwise demonstrate persistent fraud or illegality in the carrying on, conducting or transaction of business[.]”
79. As set forth above, Respondents have repeatedly violated Administrative Code § 17-1702(a) by selling or holding for sale animals in a dwelling.
80. Accordingly, Respondents have engaged in repeated and persistent illegality in violation of Exec. Law § 63(12).

**FIFTH CAUSE OF ACTION  
PURSUANT TO EXECUTIVE LAW § 63(12):  
FALSE ADVERTISING IN VIOLATION OF  
GENERAL BUSINESS LAW § 350**

81. Petitioner repeats and realleges the paragraphs above as if fully set forth herein.
82. Gen. Bus. § 350 declares unlawful “[f]alse advertising in the conduct of any business, trade or commerce or in the furnishing of any service in this state[.]” False advertising “means advertising, including labeling, of a commodity, . . . if such advertising is misleading in a material respect. In determining whether any advertising is misleading, there shall be taken into account (among other things) not only representations made by statement, word, design, device, sound or any combination thereof, but also the extent to which the advertising fails to reveal facts material in the light of such representations with respect to the commodity . . . to which the

advertising relates under the conditions prescribed in said advertisement, or under such conditions as are customary or usual.” Gen. Bus. § 350-a.

83. Gen. Bus. § 350-d authorizes the OAG to bring a civil action to recover civil penalties whenever the OAG has reason to believe that any person, firm, corporation, or association, or agent or employee thereof, has engaged in false advertising.

84. As set forth above, Respondents have repeatedly and persistently engaged in false advertising by advertising the availability of dogs, cats, rabbits, or guinea pigs for sale and misleading consumers about the legality of such sales.

85. Accordingly, Respondents have engaged in false advertising in violation of Gen. Bus. § 350.

**WHEREFORE**, Petitioner requests that this Court grant relief pursuant to Gen. Bus. § 753-f, Exec. Law § 63(12), Administrative Code §§ 17-1702(a)-(b), and Gen. Bus. § 350 against Respondents by issuing an order and judgment:

- a. Permanently enjoining Respondents and their agents, employees, successors, assigns, and any other person acting under Respondents’ direction or control, whether acting individually, or through any corporation, company, entity, or device, from violating Gen. Bus. § 753-f (the Puppy Mill Pipeline Act) and Exec. Law § 63(12), and from engaging in the illegal practices alleged in the verified petition, including but not limited to offering for sale or the selling of dogs, cats, or rabbits;
- b. Permanently enjoining Respondents and their agents, employees, successors, assigns, and any other person acting under Respondents’ direction or control, whether acting individually, or through any corporation, company, entity, or device, from violating Administrative Code § 17-1702(b) and Exec. Law § 63(12), and

- from engaging in the illegal practices alleged in the verified petition, including but not limited to offering for sale or the selling of dogs, cats, rabbits, or guinea pigs;
- c. Permanently enjoining Respondents and their agents, employees, successors, assigns, and any other person acting under Respondents' direction or control, whether acting individually, or through any corporation, company, entity, or device, from violating Administrative Code § 17-1702(a) and Exec. Law § 63(12), and from engaging in the illegal practices alleged in the verified petition, including but not limited to selling animals or holding animals for sale in a dwelling;
- d. Permanently enjoining Respondents and their agents, employees, successors, assigns, and any other person acting under Respondents' direction or control, whether acting individually, or through any corporation, company, entity, or device, from violating Gen. Bus. § 350 by falsely advertising and misleading consumers about the availability of dogs, cats, rabbits, or guinea pigs for sale despite the prohibitions against such sales by Gen. Bus. § 753-f and Administrative Code §§ 17-1702(a)-(b);
- e. Pursuant to Gen. Bus. § 755(1), directing Respondents to pay a civil penalty in the sum of \$1,000 to the State of New York for each violation of Gen. Bus. § 753-f;
- f. Pursuant to Gen. Bus. § 350-d, directing Respondents to pay a civil penalty in the sum of \$5,000 to the State of New York for each violation of Gen. Bus. § 350;
- g. Granting equitable relief, including Respondents' disgorgement of all profits from the illegal practices alleged herein;
- h. Directing Respondents to provide a full accounting of all dogs, cats, rabbits, and guinea pigs, offered for sale, lease, barter, auction, or other transfer of ownership

from December 15, 2024, to the date of the judgment of this Court, including (i) the name of the animal, (ii) the name of the breeder or distributor of the animal, (iii) a description of the animal, (iv) the posted retail price or fee for the animal, (v) the date of the sale and/or transfer of the animal, (vi) the final sale price or fee for the animal, and (vii) the name, address, telephone number, and electronic mail address of the purchaser or transferee of the animal;

- i. Directing Respondents to provide a Certificate of Veterinary Inspection (“CVI”) or health certificate as required by 1 N.Y.C.R.R. § 65.2 for each dog and cat identified by Respondents pursuant to paragraph h above;
- j. Awarding Petitioner statutory costs against Respondents in the amount of \$2,000 pursuant to C.P.L.R. 8303(a)(6); and
- k. Granting Petitioner such other and further relief as this Court deems just and proper.

DATED: Brooklyn, New York  
June 15, 2026

LETITIA JAMES  
Attorney General of the State of New York  
Attorney for Petitioner

*Deborah Diamant*  
\_\_\_\_\_  
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**VERIFICATION**

DEBORAH DIAMANT, an attorney admitted to practice before the courts of the State of New York, hereby affirms and certifies that:

I am an Assistant Attorney General in the Office of the New York State Attorney General, Letitia James, and am authorized to make this verification.

I have read the foregoing verified petition and know the contents thereof, which are to my knowledge true, except as to matters stated to be alleged upon information and belief, and as to those matters, I believe them to be true. The grounds of my belief as to all matters stated upon information and belief are set forth in the attached affirmation and include investigatory materials and information contained in the files of the Brooklyn Regional Office.

The reason this verification is made by your affirmant and not by the State of New York is that the State of New York is a body politic and sovereign acting through its officials and agents.

DATED: Brooklyn, New York  
June 15, 2026

*Deborah Diamant*

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DEBORAH DIAMANT