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7 Attorneys for Defendant Matt Friedman

8 **SUPERIOR COURT OF CALIFORNIA**

9 **COUNTY OF LOS ANGELES**

10  
11 MELISSA BACELAR, an individual; WAGMOR ) **CASE NO. 24STCV01638**  
12 PETS, a California non-profit corporation; )  
13 WYLDER’S HOLISTIC PET CENTER, INC. dba ) **DECLARATION OF ATTORNEY**  
14 THE WAGMOR, a Delaware corporation, ) **BRYAN PEASE**  
15 )  
16 Plaintiffs, )  
17 vs. )  
18 )  
19 KIM SILL, aka KIMERBLY DAWN DAWSON, )  
20 an individual; SHELTER HOPE PET SHOP, )  
21 INC., a California non-profit corporation; MATT )  
22 FRIEMDMAN, an individual; FAITH BALLIN, )  
23 an individual; and DOES 1-500, inclusive, )  
24 )  
25 Defendants. )  
26 )  
27 )  
28 )

1 I, Bryan Pease, Esq., declare:

2 1. I am an attorney licensed to practice before all California courts and am attorney of  
3 record for Defendant Matt Friedman in the above-captioned action. I state the following of my own  
4 personal knowledge.

5 2. On May 29, 2024, I visited the Instagram page of @shelterhope\_petshop and viewed a  
6 video posted 19 weeks ago available at the following link:

7 [https://www.instagram.com/reel/C2GS8NdP\\_vB/?igsh=MWp6YnQxYXFjd2tjOA%3D%3D](https://www.instagram.com/reel/C2GS8NdP_vB/?igsh=MWp6YnQxYXFjd2tjOA%3D%3D)

8 3. A true and correct screenshot of this video as attached hereto as Exhibit 1, showing  
9 Plaintiff Melissa Bacelar as she claims the “shelters are empty” in a video also showing news footage of  
10 animal shelters overflowing, and explaining that because Bacelar purchases designer breeds from puppy  
11 mills to sell and claim they are “rescues,” she is not interested in finding homes for shelter dogs as she  
12 falsely claims.

13 4. I also visited <https://shelterhopepetshop.org/>, which does not appear to contain any  
14 information about Plaintiffs, but it does link to the Instagram account referenced above.

15 5. On May 29, 2024, I also visited <https://thetruthaboutwagmorpets.com>, which is filled  
16 with consumer protection information about Melissa Bacelar and her “Wagmor” entities, Plaintiffs in  
17 this action. A true and correct printout of the homepage of this site, which also contains many more  
18 subpages with vastly more information about Bacelar’s fraudulent operation, is attached hereto as  
19 Exhibit 2.

20 6. On May 29, 2024, I also visited the Instagram page @thetruthaboutwagmorpets.com,  
21 which is similarly filled with consumer protection information about Plaintiffs. A true and correct copy  
22 of that Instagram page I printed is attached hereto as Exhibit 3.

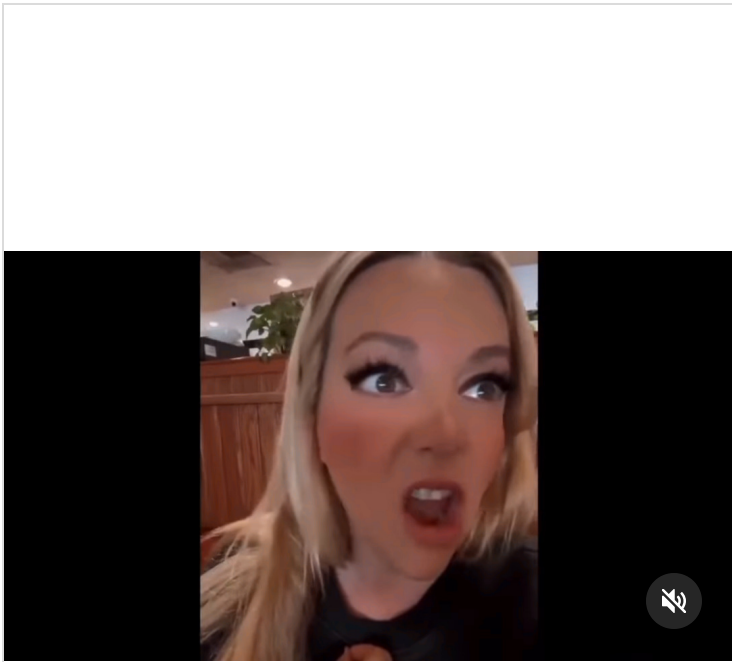
23  
24 I declare under penalty of perjury under the laws of California the foregoing is true and correct.

25  
26 Dated: May 29, 2024

27 By: 

28 Bryan Pease, Esq.

# Exhibit 1



shelterhope\_petshop · Following



Original audio



shelterhope\_petshop 19w

@thetruthaboutwagmorpets



1 like Reply



lisachiarelli 19w

Thank you for sharing this.



5 likes Reply



yashasvithakurr 18w

🤔 🤔 🤔 ❤️ ❤️



633 likes

January 14



Add a comment...

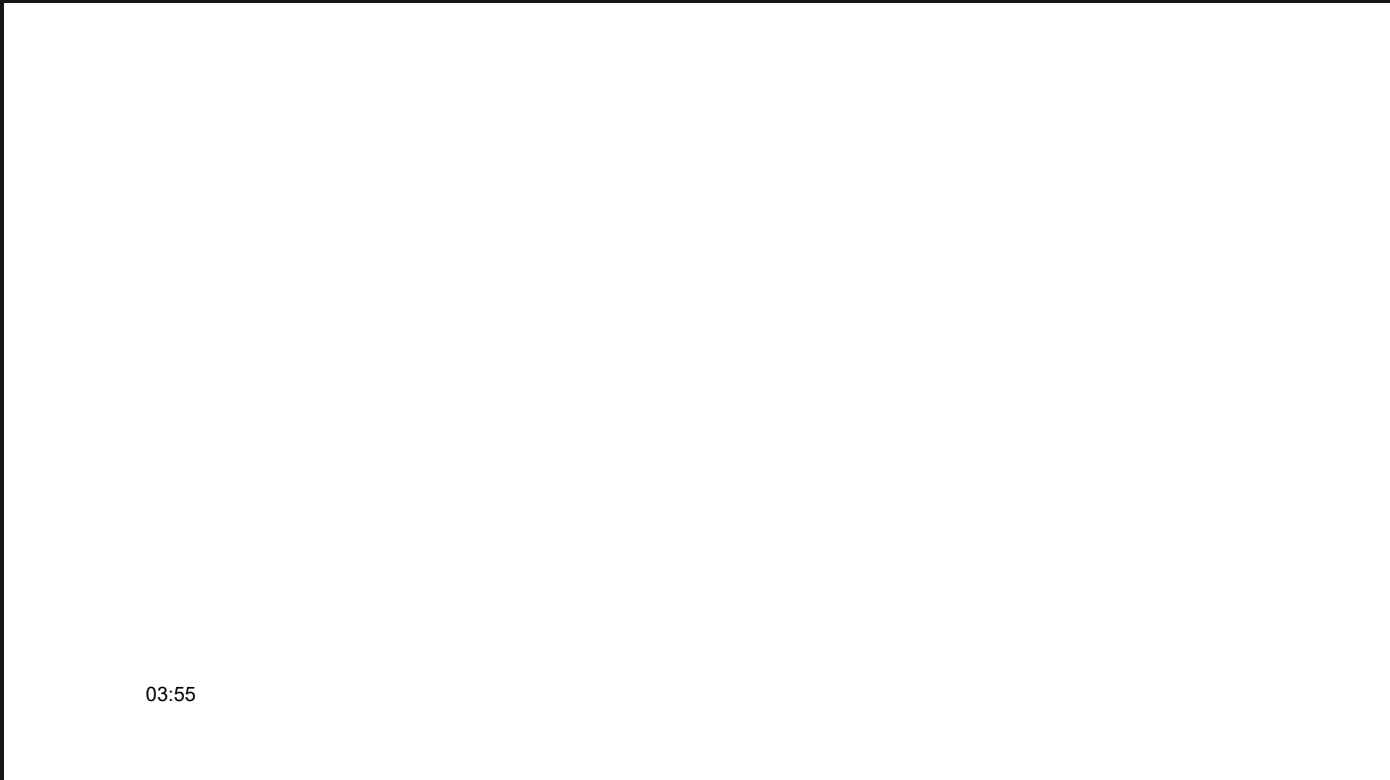




# Exhibit 2



# THE TRUTH ABOUT WAGMOR PETS



03:55

## REALTIME UPDATES

Newest first

Clear filter

★ ★ ★ ★ ★ 22 hours ago

I had questions about where their dogs come



Heather A.

99 165 70

6 hours ago

Let me preface this by saying I got a wonderful dog here. But there were many lies told in the process I have come to find out that this place is now a puppy mill store. They charge well over \$500 for dog and that is absolutely illegal. They

from and their adoption process so I asked on social media. They immediately started cursing at me in comments and proceeded to block me. Wagmor is a breeder puppy broker partially responsible for crowded shelters and euthanasia in Los Angeles shelters. Do your research when supporting charities with donations or when adopting.

8 hours ago

DO NOT BUY OR DONATE TO THIS PUPPY MILL - Greedy disgusting human being runs this so called "rescue" .. they do not rescue dogs in need - they just RE-SELL puppies from backyard breeders. They also do not spay or neuter their dogs before adoption so they are adding to the euthanasia crisis going on in California. Shame on



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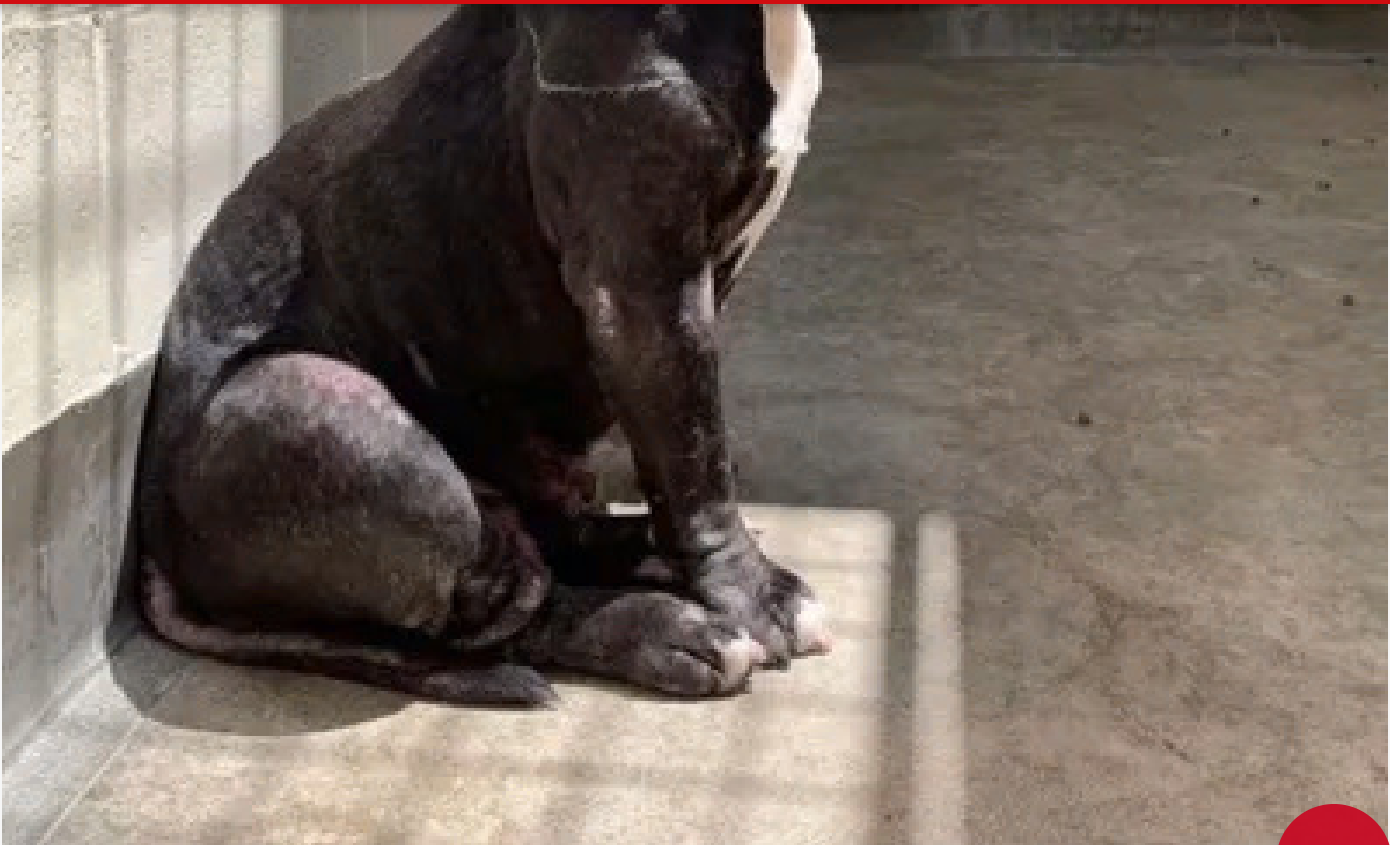
# IF YOU BUY PUPPIES FROM A BACKYARD BREEDER...

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Click to see the real consequences to homeless animals

## **Dogs aren't Wagmor's only victims, so are donors, adopters, and supporters.**

**Our goal is to educate and inform potential donors and adopters.**

Adopt animals from a legitimate rescue or, better yet, directly from an animal shelter. Animals in the Animal Shelter System are most at risk of being euthanized. Please see our Rescue Resources Page for helpful information.

Tips submitted through website will be fully vetted and require document to support any claims made. This website isn't a tool for rumors or retaliation; it is meant to inform potential adopters.

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**Memo** [redacted] at LB \*\*LB\*\*

File Commands Procedures Reports Extras Help

2020-01-09 07:06:28.5

Memo No	Memo ID	D Type	Date	Type	Subtype	Author
M20-995439	[redacted]	PERSON_ID	01/09/20	NOTE	NO ADOPT	[redacted]

Extra1 Extra2 Extra3 Extra4 Extra5

Memo Text Templates [A] [R]

Do not adopt animals to MELISSA BACELAR under any circumstance.

Her rescue organization, which may go by the various names "Lucky Puppy", "Lucky Puppy Rescue and Retail", "The Poopie Foundation Animal Rescue and Education", have been convicted of 1 count animal cruelty and 2 counts animal abuse charged by LA Animal Services.

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Memo No	Memo Date	Memo Type	Subtype	Memo Text
M20-995439	01/09/20 00:00	NOTE	NO ADOPT	Do not adopt animals to MELISSA BACELAR und



**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**

**Civil Division**

Central District, Stanley Mosk Courthouse, Department 34

**24STCV01638**

**MELISSA BACELAR, AN INDIVIDUAL, et al. vs [REDACTED]  
et al.**

March 28, 2024

8:30 AM

Judge: Honorable Michael P. Linfield  
Judicial Assistant: Reyna Navarro  
Courtroom Assistant: Vanessa Galindo

CSR: Jennifer Aguilar, CSR# 12993  
ERM: None  
Deputy Sheriff: None

Defendant submits screenshots of the various websites and Instagram accounts at issue. (Decl. Dayton, Exhs. 1–4.) Whether or not this material is authenticated, most of the relevant

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Plaintiffs. (Decl. Dayton, Exhs. 2, 4.)

Defendant also submits a Google News search of the phrase “Wagmor pets,” which brings up various links. (Decl. Dayton, Exh. 5.)

Finally, among other things, Defendant declares: (1) that she does not own or control the websites or the Instagram accounts; (2) that she did not contact a 13-year-old Instagram influencer about Plaintiffs; (3) that she did not speak with a minor about Plaintiffs; (4) that she did not encourage a minor to make posts about Plaintiffs; and (5) that Defendant is concerned about Plaintiffs’ alleged mistreatment of animals. (Decl. Ballin, ¶¶ 4–5, 7.)

ii. Plaintiffs’ Evidence

Plaintiffs submits: (1) screenshots of what appears to be either a comments thread or a direct message; (2) a post from the Instagram account for @thetruthaboutwagmorpets; and (3) a newsletter post from the “Shelter Hope Pet Shop Weekly Newsletter.” None of this material is authenticated and most of the relevant portions are inadmissible hearsay. (See Opposition, Exhs. 1–3.)

Plaintiffs also submit: (1) Declaration of Christine Lagrua; and (2) Declaration of Melissa Bacelar.

Much of the Declaration of Christine Lagrua consists of inadmissible hearsay. (See Opposition, Decl. Lagrua, ¶¶ 3–8.) Furthermore, the Declaration of Christine Lagrua lacks



**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**

**Civil Division**

Central District, Stanley Mosk Courthouse, Department 34

**24STCV01638**

March 28, 2024

**MELISSA BACELAR, AN INDIVIDUAL, et al. vs KIM SILL,  
et al.**

8:30 AM

Judge: Honorable Michael P. Linfield  
Judicial Assistant: Reyna Navarro  
Courtroom Assistant: Vanessa Galindo

CSR: Jennifer Aguilar, CSR# 12993  
ERM: None  
Deputy Sheriff: None

credibility because it claims phone calls (with no phone records) and images (with no copies of those images). (Id. at ¶¶ 5, 8.) Lastly, although the Court is not basing its decision on this matter, it is not clear that the Lagrua Declaration is actually signed; the copy attached to the Opposition is unsigned, and the separate copy filed with Court apparently as only a typed signature

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of prevailing on the claim. (*Equilon Enters., supra*, 29 Cal.4th at p. 61.)

Plaintiffs have not made that showing here.

Plaintiffs have not provided any admissible evidence that would indicate Defendant owns or controls the websites and associated Instagram accounts at issue. Rather, Defendant declares the opposite, and the Court finds her testimony to be credible.

Plaintiffs have not provided any admissible evidence that would indicate Defendant had any contact with a 13-year-old Instagram influencer. Rather, Defendant declares the opposite, and the Court finds her testimony to be credible.

Plaintiffs have not provided any admissible evidence that would indicate Defendant coached anyone to make posts about Plaintiffs or that Defendant made anyone make posts about Plaintiffs. Rather, Defendant declares the opposite, and the Court finds her testimony to be credible.

Plaintiffs have provided evidence that they did not stalk a minor, make death threats, and so on. But that is insufficient for a cause of action of defamation when there is no evidence before the Court that Defendant made such claims or was involved in any way with the making of such claims.

The Court GRANTS the Anti-SLAPP Motion.





## RESCUERS BUY DOGS FROM BREEDERS AT AUCTIONS

Documents obtained by an industry source reveal a shadow market:

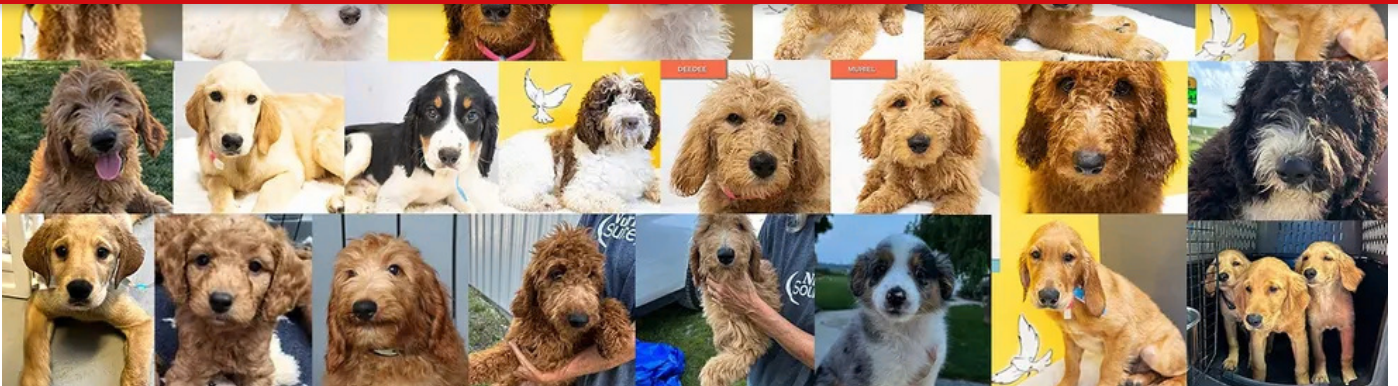


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<b>efile Public Visual Render</b>		<b>ObjectId: 202243089349303074 - Submission: 2022-11-04</b>	<b>TIN: 84-2136684</b>
<b>SCHEDULE O</b> (Form 990)  Department of the Treasury Internal Revenue Service	<b>Supplemental Information to Form 990 or 990-EZ</b> Complete to provide information for responses to specific questions on Form 990 or 990-EZ or to provide any additional information. ▶ Attach to Form 990 or 990-EZ. ▶ Go to <a href="http://www.irs.gov/Form990">www.irs.gov/Form990</a> for the latest information.		OMB No. 1545-0047  <b>2021</b>  Open to Public Inspection
	Name of the organization WAGMOR PETS		Employer identification number 84-2136684

Return Reference	Explanation
Statement Note 1	<b>RELATED PARTY TRANSACTIONS</b> Wagmor Pets houses rescued dogs at a boarding facility operated by Wagmor Pets President. The boarding facility provides shelter, food and veterinarian services to our rescued dogs. When the dog is adopted, the adopter signs paperwork and pays a reimbursement fee to the boarding facility for all services that the boarding facility had provided. The adoption fees are the full payment that the boarding facility receives in exchange for the provided services.
Form 990, Part VI, Line 11b: Form 990 Review Process	No review was or will be conducted. <p style="text-align: center;"> <span style="color: red;">↑</span> <b>WHY DOES THIS MATTER?</b>                      Donations made to Wagmor Pets Rescue are used to cover veterinarian services, food and other expenses BUT that is NOT where the adoption fees are going back to. Adoption fees DO NOT go back into the rescue bank account but are deposited into the FOR-PROFIT Pet Hotel aka Melissa Bacelar's personal business bank account. ADOPTION FEES DO NOT GO BACK INTO SAVING DOGS!                 </p>
Form 990, Part VI, Line 12: Other	No documents available to the public.

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**RELATED PARTY TRANSACTIONS**

WAGMOR PETS HOUSES RESCUED DOGS AT A BOARDING FACILITY OPERATED BY WAGMOR PETS PRESIDENT. THE BOARDING FACILITY PROVIDES SHELTER, FOOD AND VETERINARIAN SERVICES TO OUR RESCUED DOGS. WHEN THE DOG IS ADOPTED, THE ADOPTER SIGNS PAPERWORK AND PAYS A REIMBURSEMENT FEE TO THE BOARDING FACILITY FOR ALL SERVICES THAT THE BOARDING FACILITY HAD PROVIDED. THE ADOPTION FEES ARE THE FULL PAYMENT THAT THE BOARDING FACILITY RECEIVES IN EXCHANGE FOR THE PROVIDED SERVICES.

+ Show More

## A.B. 485 Social Compassion in Legislation

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## Social Compassion in Legislation A.B. 485



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## California charity taking credit, raising money off of Oklahoma husky shelter's work

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**DECLINE**

**ACCEPT**

Objection - PLAINTIFFS OBJECTION TO DEFENDANTS NOTICE OF RELATED CASE  
(pdf)

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**DOWNLOAD**

DECLARATION IN SUPPORT OF SPECIAL MOTION TO STRIKE COMPLAINT (pdf)

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PLAINTIFFS' OBJECTION TO DEFENDANTS' NOTICE OF RELATED CASE (pdf)

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NOTICE OF RELATED CASE 22STCV2077 I (pdf)

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**ACCEPT**

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NOTICE OF RULING (pdf)

**DOWNLOAD**

Case No.- 22STCV20771 JOINT STATUS REPORT (pdf)



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DECLARATION OF KYLA DAYTON IN SUPPORT OF SPECIAL MOTION TO STRIKE COMPLAINT (pdf)

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DEFENDANT SPECIAL MOTION AND SPECIAL MOTION TO STRIKE COMPLAINT

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**ACCEPT**







# SCIL

## Social Compassion in Legislation

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## Laundering Puppy-Mill Bred Dogs!

Over the last few years, SCIL has received complaints from concerned supporters about the business practices of The Wagmor, a for-profit entity, and Wagmor Pets, a nonprofit entity. Concerns raised to us have centered on suspicions that the Wagmor has been flouting California law, [AB 485](#), which SCIL sponsored in 2017, which bans the sale of dogs, cats, or rabbits from pet stores. Additionally, the lawsuit claims that Wagmor is violating a bill SCIL supported in 2019, [AB 2152](#), which restricts paying brokers or breeders for the animals or receiving compensation over \$500 for any adoption fees.

There are many complaints against Wagmor. Thankfully some folks are taking a stand and have started to come forward publicly about their horrific experiences with the company, including dogs being sick with transmittable diseases and instances of dogs dying due to health conditions immediately after being "adopted" from Wagmor.



Thanks to the work of dedicated plaintiffs and their attorneys, the truth about the practices of Wagmor are being made public. We are encouraged and hopeful that the lawsuit against The Wagmor will finally put an end to the company's allegedly illegal practices, as well as spur stronger enforcement measures from LA Animal Services for any criminal actions.

Take the time to read the entire complaint against The Wagmor and Wagmor Pets below. You can also visit the website [www.TheTruthAboutWagmorPets.com](http://www.TheTruthAboutWagmorPets.com) to read and hear more about the companies practices.

We encourage everyone to share this information so that

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Research on their rescue to make sure they are reputable. There are a lot of great rescues out there, but sadly there will always be people making a profit off of selling animals while masquerading as legitimate rescue organizations.

animals and families. The relentless pursuit of justice and heightened awareness has demanded unwavering dedication, often in the face of persistent pressures to stop. In the course of this mission, we have also borne witness to the unfortunate circumstances of individuals who, unknowingly, adopted ailing puppies, many of which did not survive, further underscoring the urgency of our cause in preventing further spread of contagious pathogens and zoonotic diseases.

As we move forward, our commitment to eradicating this unethical trade and securing loving, responsible homes for shelter dogs remains steadfast. The work ahead is far from complete, but with continued support from the press and the public, we can make a meaningful impact on ending such activities.

Once again, we thank you for spotlighting our mission. Together, we can serve as a resounding voice for those who cannot speak and labor toward a world free from the atrocities and offenses that equate to a dog's very survival.

## First Amended Class Action Complaint

[Download PDF >](#)

1 Jill L. Ryther, Esq. (266016)  
 2 *jill@rytherlawgroup.com*  
**RYTHER LAW GROUP**  
 3 5777 W. Century Blvd., #1110-2076  
 Los Angeles, CA 90045  
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4 Jason A. Ibey, Esq. (284607)  
 5 *jason@kazlg.com*  
**KAZEROUNI LAW GROUP, APC**  
 6 321 N Mall Drive, Suite R108  
 St. George, UT 84790  
 7 T: (800) 400-6808; F: (800) 520-5523

**FILED**  
 Superior Court of California  
 County of Los Angeles  
**12/29/2022**  
 Sherri R. Carter, Executive Officer / Clerk of Court  
 By:                      K. Martinez Deputy

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Electronically Received 12/29/2022 04:39 PM  
 REVOLVE LAW C  
 LLP  
 2601 Main Street, S  
 Irvine, California  
 (833) 775-455

**SUPERIOR COURT OF CALIFORNIA**  
**COUNTY OF LOS ANGELES – UNLIMITED CIVIL**

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[REDACTED], an individual; [REDACTED],  
 an individual; [REDACTED],  
 an individual; on behalf of themselves and all  
 others similarly situated,  
 Plaintiffs,  
  
 vs.  
  
 MELISSA BACELAR, an individual;  
 WAGMOR PETS, a California non-profit  
 corporation; WYLDER’S HOLISTIC PET  
 CENTER, INC. dba THE WAGMOR, a  
 Delaware corporation; and Does 1 through 10,  
 inclusive,  
  
 Defendants.

Case No.: 22STCV20771

**FIRST AMENDED CLASS ACTION**  
**COMPLAINT DAMAGES AND**  
**INJUNCTIVE RELIEF FOR:**

1. Violation of California’s Unfair Competition Law, Bus. & Prof. Code § 17200 *et seq.*
2. Violation of California’s False Advertising Law Bus. & Prof. Code § 17500 *et seq.*
3. Violation of California’s Consumer Legal Remedies Act, Cal. Civ. Code § 1750, *et seq.*
4. Intentional Misrepresentation and Fraud
5. Negligent Misrepresentation, and,
6. Unjust Enrichment

**DEMAND FOR JURY TRIAL**

## Husky Halfway House Response to Wagmor's Donation Raising Scheme



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## H3 Rescue Rides Episode One - California or Bust ROAD TRIP!



Wagmor takes all the puppies and leaves the mama dog behind!



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## Buys From Backyard Breeders

Melissa Bacelar and Wagmor Pets have more inventory of "surrendered" or "abandoned" puppies than the entire LA County Animal Service System.

FIND OUT MORE

## Uses Dog Rescue and Charitable Organization to Embezzle Funds

Melissa Bacelar uses "rescue" as a commodity and 501 c 3 status to collect, literally hundreds of thousands of dollars in donations for her own personal use.

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that suffered from serious fatal & contagious conditions. All but one died.

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## CLASS ACTION RECORDS

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ANSWER TO UNVERIFIED COMPLAINT (pdf)

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JOINT STATEMENT CONFERENCE (pdf)

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STIPULATION AND PROTECTIVE ORDER – CONFIDENTIAL DESIGNATION ONLY  
(pdf)

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PLAINTIFFS' EVIDENTIARY OBJECTIONS TO DEFENDANTS' DEMURRER TO FIRST  
AMENDED CLASS COMPLAINT (pdf)

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PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANTS' DEMURRER TO  
FIRST AMENDED CLASS COMPLAINT (pdf)

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Joint Status Conference Statement (1-4) (pdf)



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Reply in Support of Demurrer to First Amended Complaint (pdf)

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Intent to Suspend or Revoke AG of CA (pdf)

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## ALLEGATIONS OF WAGMOR'S UNETHICAL RESCUE PRACTICES

---



## Sends Older Less Adoptable Dogs to Shelters & Other Rescues

When Wagmor imports dogs from Mexico or gets dogs from a 'hoarding situation', Ms. Bacelar sends the older, less adoptable dogs to other shelters & rescues up north, keeping the puppies. Often these have serious medical issues and in bad condition.

## Reports Adopters Who Speak Out Against Wagmor to Animal Control

After learning of their new puppy had Parvo severe that the pup had to be euthanized, the adopter spoke out on social media. Ms. Bacelar allegedly had one of her employees report the adopters

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## Celebrity Adoptions & Support

Celebrities provide Melissa Bacelar credibility and cover for the fraud she commits. Ellen Degeneres, Chrissy Teigen, Kris Jenner, Maya Rudolph, & others. These dogs were purchased for you and not rescued from a neglectful situation.

FIND OUT MORE

## Celebrities Promoting Wagmor, Distract from and Mask the Dark Underbelly of Operations:

- dogs are being purchased and passed off as "rescues," and dogs are not being seen by a licensed veterinarian prior to sale;
- dogs are being medically treated by an unlicensed individual in her home in lieu of proper veterinary care;
- puppies exposed to parvovirus and distemper are going home with unsuspecting new owners and immediately being diagnosed with canine parvovirus;



- d. puppies are dying and BACELAR is placing blame on the adopters;
- e. BACELAR is laundering money meant for WAGMOR PETS NON-PROFIT to her for profit business, THE WAGMOR, and living lavishly;
- f. desperate owners who are seeking help from BACELAR to treat their ill and dying dogs are being forced to execute non-disclosure agreements in order to receive assistance;

[FIND OUT MORE](#)

## Allegations against Ms. Bacelar Includes Misappropriation of Donations

THE WAGMOR's bank account and uses the funds for her personal expenses. For example, high

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children.

[FIND OUT MORE](#)

## Desperate Owners Seeking Help to Treat Dying Dogs Forced to Execute Non-Disclosure Agreements

Allegedly Wagmor Adopts Out Puppies with Parvo. When the adopter reaches out to Ms. Bacelar reporting serious medical concerns, she either pretends she doesn't know anything about it, states no other puppies show signs of illness, or turns around and blames it on the adopter. She continues to adopt out litter mates while exposing healthy puppies to puppies with Parvo. The majority of these alleged occurrences have a sad outcome resulting in the death of the puppy.



Desperate owners who are seeking help from BACELAR to treat their ill and dying dogs are being forced to execute non-disclosure agreements in order to receive assistance.

[READ COMMUNICATION](#)

## Misrepresents Rescue Dog's Story For Increased Donations

The more dramatic of stories, such as an animal is in immediate threat of euthanization, serious cases of abuse or severe medical conditions - the more donations come in. Ms. Bacelar

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A charitable organization that is not in good standing with the Registry of Charitable Trusts may not operate or solicit donations in California. (Cal. Code of Regs., tit. 11, § 999.9.4.)

[FIND OUT MORE](#)

## Proof of Buying Puppies

Communication of Ms. Bacelar Negotiating Price for Puppies. By creating a market demand, puppy mill operators are incentivized by profit.

[SEE EVIDENCE](#)



# RECORD LIBRARY

Review Court Records, Secretary of State Filings, IRS Records, Records from Attorney General, & Discovery from Litigation

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## Adoption Fees Higher than Allowed by State Law

In the state of California, adoption fees of rescue dogs can not exceed \$500

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Celebrities good intentions have also been taken advantage of.

[FIND OUT MORE](#)

CASE NUMBER: BC598098 CATHY GREEN ET AL VS MELISSA BACELAR

[Download PDF >](#)



1 Mathew K. Higbee (SBN 241380)  
 2 **HIGBEE & ASSOCIATES**  
 3 1504 Brookhollow Dr. #113  
 4 Santa Ana, CA 92705  
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6 Jill L. Ryther, Esq. (SBN 266016)  
 7 **RYTHER LAW GROUP**  
 8 8560 West Sunset Blvd., Suite #500  
 9 West Hollywood, CA 90069  
 Ph: (424) 274-4706; Fx: (310) 773-9192

Attorneys for Plaintiffs Cathy Green, Jonathan Fairbanks,  
 Kristina Warner, Kimberly Wright, Seth Waskow and  
 Yasmin Waskow

**FILED**  
 Superior Court of California  
 County of Los Angeles

**AUG 17 2016**

Sherri R. Carter, Executive Officer/Clerk  
 By [Signature] Deputy  
 Lorena Albino

*NO summons  
 issued*

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**DECLINE**

**ACCEPT**

08/18/2016

17 public; YASMIN WASKOW, an individual,  
 18 individually and on behalf of the public,

PLAINTIFFS,

vs.

20 MELISSA BACELAR, an individual; GAIL  
 21 BACELAR, an individual; THE WYLDER  
 22 FOUNDATION, a California nonprofit  
 23 public benefit corporation; WYLDER'S  
 24 SWEET SHOP, LLC, California corporation  
 25 *dba* WYLDER'S PET CENTER &  
 26 RESCUE; WYLDER'S HOLISTIC PET  
 27 CENTER, INC., a Delaware corporation *dba*  
 28 THE WAGMOR; and DOES 1-15, Inclusive.

DEFENDANTS.

Distress

5. Negligent Infliction of Emotional  
 Distress

6. Violation of Business and Professions  
 Code §17200 (Unfair and Fraudulent)

7. Violation of Business and Professions  
 Code §17200 (Unlawful)

8. Violation of Business and Professions  
 Code §17500

9. Negligence

10. Injunctive Relief

**[Unlimited Case Over \$25,000.00]**

**[Jury Trial Requested]**

**THIRD AMENDED COMPLAINT FOR DAMAGES**

## COURT RECORDS - Additional Pleadings on \*RECORDS\* Page

In order to be fair and represent both sides of the story, we not only included the complaints filed against Ms. Bacelar in a court of law, but also the Defendants responses. Our credibility could be in question without providing both sides of the argument.

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DECLINE

ACCEPT

VERIFIED SECOND AMENDED COMPLAINT Case Number- BC598098 CATHY GREEN ET AL VS MELISSA BACELAR ET AL (pdf)

DOWNLOAD

VERIFIED COMPLAINT Case Number- BC598098 CATHY GREEN ET AL VS MELISSA BACELAR ET AL (pdf)

DOWNLOAD

ANSWER TO COMPLAINT (pdf)



**DOWNLOAD**

Case Number- 15V00995 HENRIQUEZ, WILLIAM VS LUCKY PUPPY RESCUE AND RETAIL (pdf)

**DOWNLOAD**

Case Number- 21STCV42715 ELLIE MOSSER VS WYLDERS HOLISTIC PET

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Case Number- 20000000 GRAY, GREEN ET AL VS MELISSA BACELAR ET AL (pdf)

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Case Number- LS026951 BACELAR, MELISSA VS. WRIGHT, KIMBERLY (pdf)

**DOWNLOAD**

Case Number- LS027243 BACELAR, MELISSA VS. FLANNERY, AMY (pdf)

**DOWNLOAD**



WYLDERS FOUNDATION TAX FILING 2016 (pdf)

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WYLDERS FOUNDATION TAX FILING 2017 (pdf)

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Case No- 21STCV42715 COMPLAINT FOR DAMAGES (pdf)

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Case No.- 21STCV42715 PLAINTIFF AND CROSS-DEFENDANT ELLIE MOSSER'S ANSWER TO WYLDER'S HOLISTIC PET CENTER INC, WAGMOR PETS, AND MELISSA BACELAR'S UNVERIFIED CROSSCOMPLAINT (pdf)

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Case No.- 21STCV42715 [Assigned to- Judge John P. Doyle, Dept 58] DEFENDANTS' ANSWER TO PLAINTIFF'S COMPLAINT 1 (pdf)



[DOWNLOAD](#)

## PROOF of Melissa Bacelar Buying Puppies

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[Download PDF >](#)

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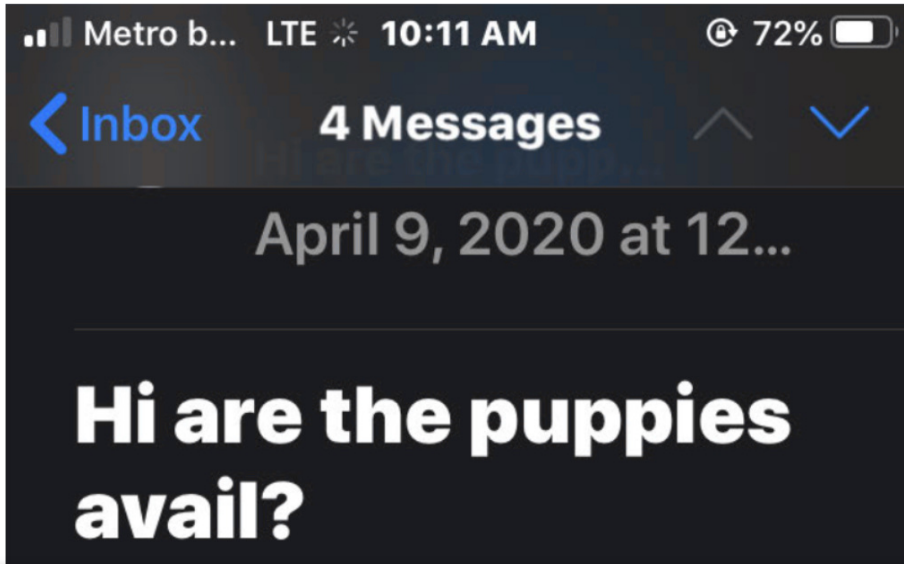
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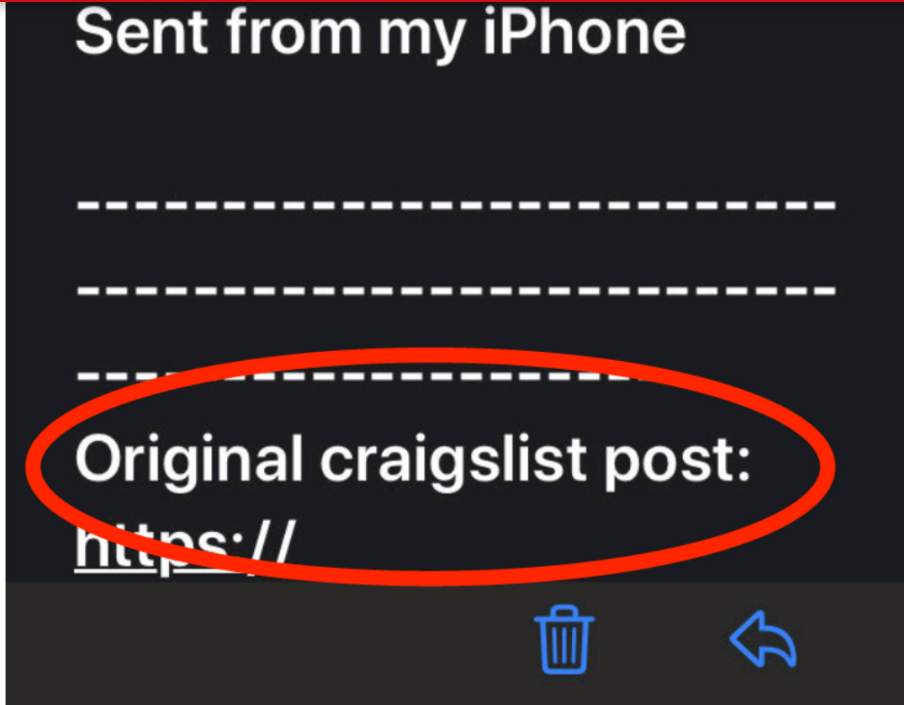






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STRAIGHT FROM THE HORSE'S MOUTH

---

## IN HER OWN WORDS...BY MELISSA BACELAR

Communication between Ms. Bacelar and Adopters. 5 of the 6 DIED. Ms. Bacelar pretends she knows nothing of it, tries to blame it on adopter, denies any of the other puppies in the litter are sick, however she knows of another death, and uses the terminal medical condition to raise donations.

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**ACCEPT**

AT&T 12:14 AM 96%

Messages (818) 939- [REDACTED] Details

I'm just really stumped. T

Vet said no chance it came from my house. He had it prior. So why only him. Totally stumped.

Right. He prob got it from breeder?? I guess. Or maybe

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Maybe breeder vaccinated to get rid of them fast, lied about their age, and it didn't take on Kobi.  
There are 5 other litter mates he didn't bring to you.  
Maybe they were sick.

08/18/2016

Right. I have no idea where they



iMessage



## Frequently Asked Questions

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**Why was this website created?** ▼

---

**Have we asked Ms. Bacelar about her questionable practices?** ▼

---

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**wrong with that?**

---

## REPORT AN INCIDENT / WAGMOR STORY

Name

Email\*

Home Address



Message

 Attach Files

Attachments (0)

Sign up for our email list for updates, promotions, and more.

**SEND**

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## **SECTION 425.16 CALIFORNIA'S ANTI-SLAPP LAW**

“act in furtherance of a person’s right of petition or free speech under the United States or California Constitution in connection with a public issue”...any other conduct in furtherance of the exercise of the constitutional right of free speech in connection with a public issue or of an issue of public interest.

**READ MORE: CODE OF CIVIL PROCEDURE – SECTION 425.16**

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FOIA



STATEMENT  
RECORDS  
TAXES  
MISINFORMATION  
CELEBRITIES  
LATEST  
RESCUE RESOURCES  
PENDING LITIGATION

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# Exhibit 3





### thetruthaboutwagmorpets



Newest first Clear filter

**Heather A.**  
 99 165 70  
 6 hours ago

Let me preface this by saying I got a wonderful dog here. But there were many lies told in the process I have come to find out that this place is now a puppy mill store. They charge well over \$500 for dog and that is absolutely illegal. They say the animal fixed and micro chipped, but they are not which is illegal. They buy dogs in bulk from puppy mills and sell them. This is a loophole because you cannot have puppy stores in

**CJ.**  
 0 6 9  
 22 hours ago

I had questions about where their dogs come from and their adoption process so I asked on social media. They immediately started cursing at me in comments and proceeded to block me. Wagmor is a breeder puppy broker partially responsible for crowded shelters and euthanasia in Los Angeles shelters. Do your research when supporting charities with donations or when adopting.

Helpful 0 Thanks 0 Love this 0 Oh no 0

**Cathy O.**  
 0 13 0  
 8 hours ago

DO NOT BUY OR DONATE TO THIS PUPPY MILL - Greedy disgusting human being runs this so called "rescue" .. they do not rescue dogs in need - they just RE-SELL puppies from backyard breeders. They also do not spay or neuter their dogs before adoption so they are adding to the euthanasia crisis going on in California. Shame on your Wagmor Pets!!

Helpful 1 Thanks 0 Love this 0 Oh no 0



entire process and unfollowing them just weeks after I brought him home. They made me fill out a ver simple questionnaire, met him for 5-10 minutes a they said if we (my ex and I) wanted him, he was ours. No home check, no home drop off, not even a trial period. Nothing. They just wanted money for the dog and that was it.

I felt very uneasy about the whole ordeal and was a little mad at myself for not previously researching Wagmor more prior to this. I looked at their IG account, saw their posts and followers and thought, well they seem legit. In the years that have followed, many, many stories have come out about them. You can get more information at @thetruthaboutwagmorpets

I have learned (especially this year) by observation and my very small role as a dog foster, what a difficult job running an animal rescue can be. While I commend anyone willing to try their best at it, I also feel that lying about where your dogs are coming from, why you have so many pure breeds and doing absolutely no work to vet potential adopters is very, very irresponsible and potentially very dangerous for the dog.

I am not posting this to shame anyone that has adopted a Wagmor dog, as I am one of those people. But, I do feel it's responsible to share this information for anyone that may potentially look to



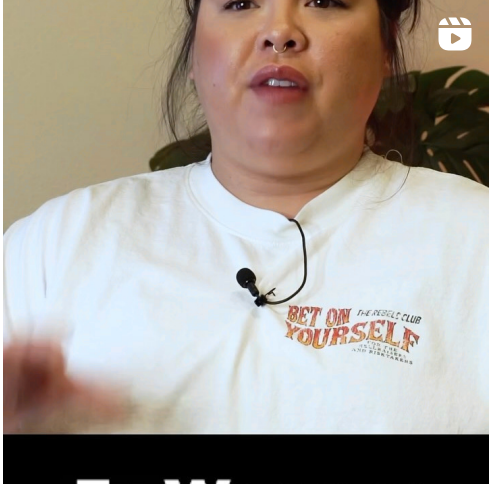
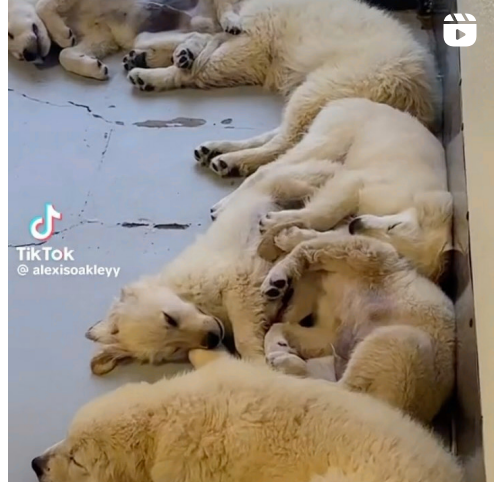
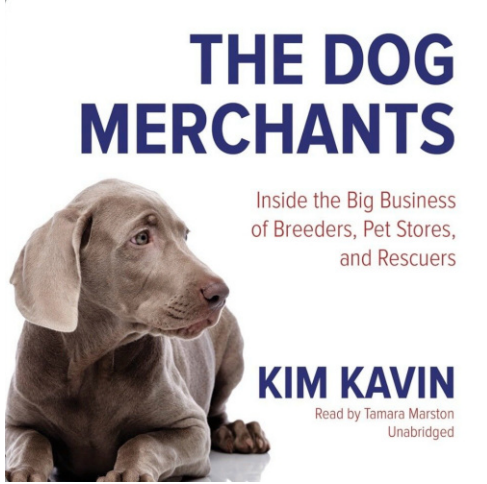
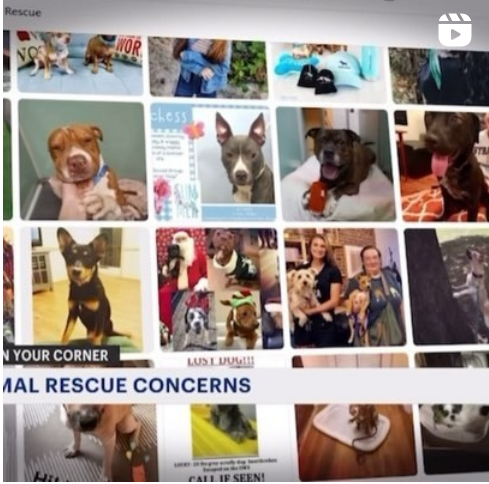
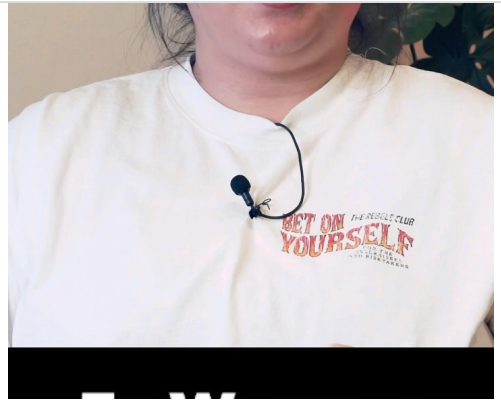
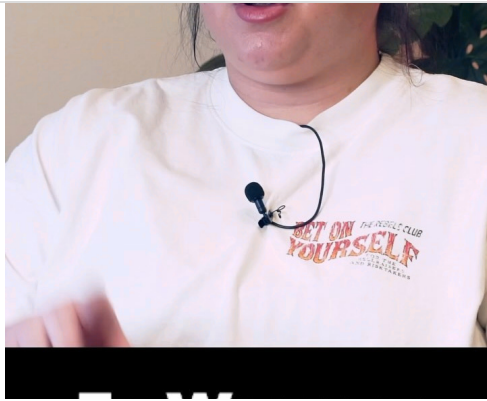




thetruthaboutwagmorpets

**2 week quarantine after first round of vaccines.**

**Vet visit to test for Parvovirus, parasites, and other diseases.**



PUBLIC RECORD REQUEST

**CPRA RESPONSE**

PART ONE:

**TRUTH UPDATE**

*Melissa Bacelar, the owner of Wagmor Pets, recently claimed that The Truth About Wagmor Pets was permanently suspended from Instagram due to "illegal activity."*

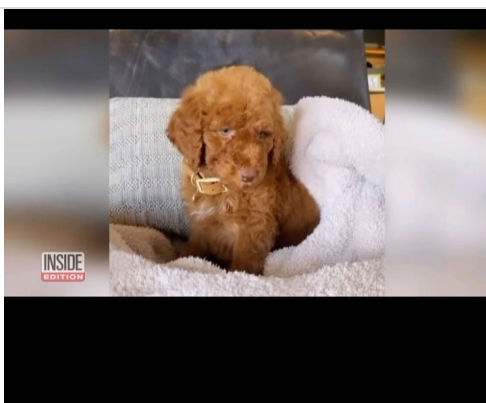
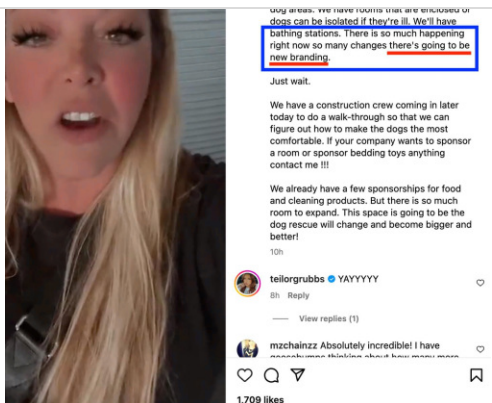




# thetruthaboutwagmorpets

**We need to address the erroneous statements Melissa Bacelar has made on Instagram.**

Wagmor Pets recently initiated defamation lawsuits against several individuals.

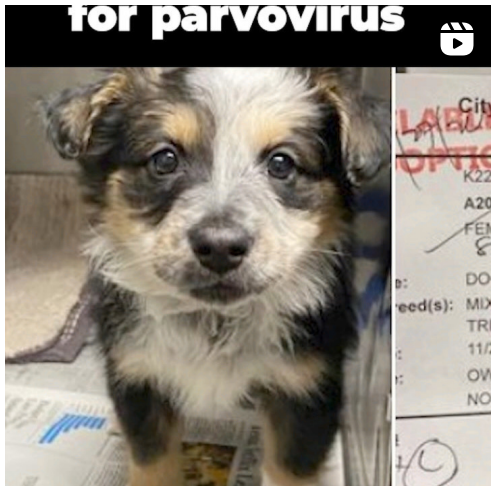


Melody Sua  
6 reviews

★★★★★ a day ago NEW

They have my dog just recently and lied about not having him. Yet they have pictures of him on their IG website. When I called them about it, they hung up on me after they lied about not having my dog. I do not trust this place at all. They're definitely scamming people to adopt dogs that are definitely lost instead of returning them to the owners.

1



**She told me...**

**"I had another dog that died..."**

**(the puppy's mom)**



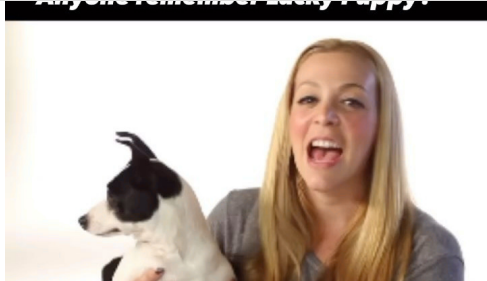




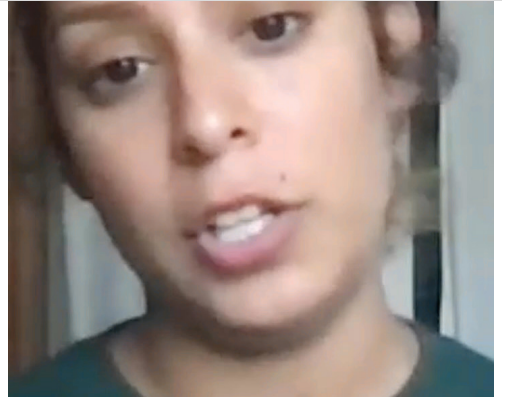
thetruthaboutwagmorpets



**Wagmor gets dogs**

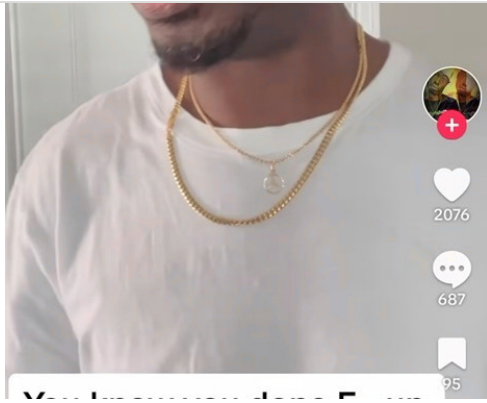


*Remember what happened to them?*





thetruthaboutwagmorpets



**conspiracy**  
**against**  
**Melissa Bacelar?**  
**(as she claims)**





# thetruthaboutwagmorpets





# thetruthaboutwagmorpets





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