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Electronically FILED by  
Superior Court of California,  
County of Los Angeles  
2/28/2024 3:36 PM  
David W. Slayton,  
Executive Officer/Clerk of Court,  
By V. Sino-Cruz, Deputy Clerk

Attorneys Plaintiff  
6 FAITH [REDACTED]

7  
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

11 MELISSA BACELAR, et al.,

12 Plaintiffs,

13 vs.

14 KIM SILL, et al.,

15 Defendants.

) Case No.: 24STCV01638

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

) (Assigned for all purposes to  
) Hon. Michael P. Linfield, Dept. 34)

) RES ID: 619716347755

Date: March 28, 2024

Time: 8:30 a.m.

Department: 34

Case Filed: January 22, 2024

Trial Date: None Set

23 I, Kyla Dayton, declare as follows:

24 1. I am counsel for Defendant Faith [REDACTED]

25 2. I have personal knowledge of the truth and accuracy of the facts set

26 forth herein, and if called upon as a witness, I could competently testify thereto. I do  
27 not intend to waive the attorney-client privilege or work product doctrine by making  
28 any statement herein.

DECLARATION





1           3.       I have visited all four of the websites Plaintiffs cited to in their  
2 complaint. It appears that only [thetruthaboutwagmorpets.com](http://thetruthaboutwagmorpets.com) website and the  
3 [@thetruthaboutwagmorpets](https://www.instagram.com/thetruthaboutwagmorpets) Instagram page discuss Wagmor Pets and/or Bacelar.  
4 True and correct copies of the two websites and two Instagram accounts are attached  
5 hereto and incorporated herein as **Exhibits “1-4.”**

6           4.       Based on the general content of the websites and social media pages  
7 cited by Bacelar in the Complaint, the issue of public concern is the mistreatment of  
8 animals marketed as rescues. The websites and social media pages cited by  
9 Plaintiffs contain testimonials, reviews, and posts detailing the way in which  
10 Wagmor Pets and Bacelar misrepresent the origin of the animals they market as  
11 rescues, their questionable practices regarding spaying and neutering, how medical  
12 issues are mishandled, dogs that are prematurely euthanized, and allegations that  
13 Wagmor Pets and Bacelar source their animals from breeders at auctions. For  
14 example, on [thetruthaboutwagmorpets.com](http://thetruthaboutwagmorpets.com), statements and video testimonials show  
15 animal mistreatment and misrepresentation related to Wagmor Pets such as:

- 16           • “MISREPRESENTING DOG RESCUE HARMS ANIMALS IN NEED  
17           OF RESCUE”
- 18           • “Ms. Bacelar Provides Medical Care in Her Home in Lieu of Having the  
19           Dogs See a Licensed Veterinarian.”
- 20           • “[Bacelar and Wagmor] also pay Delacruz to provide services to [them].  
21           Delacruz is the “medical coordinator” for WAGMOR PETS NON-  
22           PROFIT but often times [Bacelar and Wagmor] elect to have Delacruz  
23           provide medical care in leiu [sic] of actually having the dogs see a  
24           licensed veterinarian.”
- 25           • “When an Adopter Returns to Wagmor with a Sick Puppy, [Bacelar]  
26           Demands They Sign an NDA in Exchange for Financial Assistance”

27           On the Instagram account [@thetruthaboutwagmorpets](https://www.instagram.com/thetruthaboutwagmorpets), similar statements  
28 and video testimonials show animal mistreatment and misrepresentation related to



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Wagmor Pets such as video testimonials from former customers indicating malnourished dogs that were not spayed, neutered, or dewormed before being adopted.

5. On February 27, 2024, I conducted a search on Google News using the term “Wagmor Pets.” Several results came up highlighting various media coverage, news articles, and celebrity involvement with Wagmor Pets. A true and correct copy of the PDF version of the search results is attached hereto and incorporated herein as **Exhibit “5.”**

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct.

Executed this 28<sup>th</sup> day of February 2024, at Rolling Hills Estates, California.

  
\_\_\_\_\_  
Kyla Dayton

# **Exhibit 1**



# THE TRUTH ABOUT WAGMOR PETS



MISREPRESENTING DOG RESCUE HARMS ANIMALS IN NEED OF RESCUE

---



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



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.

This website is a compilation of records and reviews in the public domain.

## "BOARDING FACILITY" COLLECTS THE "REIMBURSEMENT FEE"

2021	FEDERAL SUPPLEMENTAL INFORMATION	PAGE 1
	WAGMOR PETS	84-2136684
<p>RELATED PARTY TRANSACTIONS</p> <p>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.</p>		



## RESCUERS BUY DOGS FROM BREEDERS AT AUCTIONS

Documents obtained by an industry source reveal a shadow market:



**1** Commercial breeders produce specialty puppy breeds.



**2** The breeders sell their puppies at auctions, often to rescue groups.



**3** The dog rescuers put the puppies up for adoption as rescue dogs.



**4** The customer may not know the dog was bought at an auction.



# Wagmor Pets Dog Rescue

11939 Ventura Blvd, Studio City, CA

 Write a review

2.3  67 reviews 



**RHINOTACTICAL**

6 reviews · 5 photos

 2 weeks ago

**NEW**

This is not going to be a kind review, but truthful. Basically wagmore rescued five Pitbull labrador mixes about a year and a half ago 2 males and a female were left with the person fostering them. We adopted 2 of the 3 .The male that was left with the foster was named dozer. Dozer came down with distemper and start getting convulsions, at which point the owner of Wagmore was notified but did little or showed no empathy or care for dozer other than saying "oh my poor dear." About 3 weeks later, only after having our pups a month from the same litter, ours Max and phoebe came down with the same sickness of distemper which is foaming uncontrollably at the mouth and uncontrollable convulsions, and basically, after a month of having these babies, we had to let them sleep. A male and a female name phoebe and Max from the same litter.

When we contacted the owner, they did very little or anything remotely Empathetic or compassionate whatsoever. In fact, they almost downright ignored our calls. Although a refund was not the point, they also did not give us a full refund or charge back the credit card for the puppies after we paid for all the veterinary fees and everything on top of the adoption fees which they would not pay. Finally, after struggling with them for many weeks to get a refund instead of crediting back our credit card,( which was a total lie) they paid us through PayPal and did not mark us as a friend, so we lost about a \$100 on that which was very mean and insensitive, all of which the owner of Wagmor never once called to tell us how sorry she was or anything. She completely handled as a business deal. Not even realizing what a traumatic experience we had over losing 2 babies we bonded with and tried to keep healthy through all of their pain for over a month. I do not feel that she takes care of those puppies that she rescues with after care compassion, follow through and/ or even curiosity. Nothing whatsoever. It's strictly a business for her camouflaged in saying "were saving animals" (are you??)and shame on her.

If anybody here chooses to do business with Wagmor that's fantastic to rescue the dogs. But just so you know you're not gonna get any empathy or after care calls or anything if something should go wrong let alone if anything goes right. Aagain , YOU WILL NOT GET anything from the owner, because those dogs are strictly a business to her. She gets them and she sells them with super high adoption fees and could care less about what happens and the feelings that people adopting those

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**IN THE COUNTY COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT  
IN AND FOR BROWARD COUNTY, FLORIDA**

PAYROLL LLC,

CASE NO.: CONO-23-007916

Plaintiff,

v.

WYLDER'S HOLISTIC PET CENTER,  
INC.,

Defendant.

\_\_\_\_\_ /

**PLAINTIFF'S FIRST REQUEST FOR ADMISSION TO DEFENDANT**

COMES NOW Plaintiff PAYROLL, LLC ("Plaintiff" or "Payroll"), by and through the undersigned counsel, and pursuant to Rule 1.370 of the Florida Rules of Civil Procedure, hereby requests that Defendant WYLDER'S HOLISTIC PET CENTER, INC. ("Defendant") admit the following request for admission within forty-five (45) days from the date of service:

1. Admit that you signed the written agreement attached to Plaintiff's Complaint as **Exhibit A**

**RESPONSE:**

2. Admit that you authorized Plaintiff to file your Employee Retention Credit ("ERC") amendment with the IRS.

**RESPONSE:**

3. Admit that you knew the estimated dollar amount of your ERC prior to Plaintiff mailing your ERC amendment to the IRS.

**RESPONSE:**

4. Admit that you amended your federal income tax return for 2020.

**RESPONSE:**

5. Admit that you amended your federal income tax return for 2021.

**RESPONSE:**

DOWNLOAD COURT RECORDS



**IN THE COUNTY COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT  
IN AND FOR BROWARD COUNTY, FLORIDA**

PAYROLL LLC,

CASE NO.:

Plaintiff,

v.

WYLDER'S HOLISTIC PET CENTER, INC.,

Defendant.

\_\_\_\_\_ /

**COMPLAINT**

**COMES NOW** Plaintiff PAYROLL, LLC (“Plaintiff” or “Payroll”), by and through the undersigned counsel, and for its Complaint against Defendant WYLDER’S HOLISTIC PET CENTER, INC. (“Defendant”), states and alleges as follows:

1. This is an action for damages in excess of Eight Thousand Dollars (\$8,000.00).
2. Plaintiff Payroll is a Florida limited liability company with a principal place of business located at 8409 N Military Trail, Suite 119, Palm Beach Gardens, FL 33410.
3. At all times material to this action, Defendant was and is a foreign corporation with a principal place of business located at 11939 Ventura Blvd, Studio City, CA 91604.
4. Jurisdiction and venue are appropriate in this action due to a contract between Plaintiff and Defendant and Fla. Stat. § 48.193(1)(a)7.
5. On or about July 13, 2022, Payroll and Defendant entered into a written ERC Agreement (the “Agreement”).
6. A true and accurate copy of the Agreement is attached hereto as **Exhibit A** and incorporated herein by this reference.

**EMPLOYEE RETENTION CREDIT**

The Employee Retention Credit (ERC or ERTC) is a complex tax credit for businesses and tax-exempt organizations that kept paying employees during the COVID-19 pandemic either when they were shut down due to a government order or when they had the required decline in gross receipts during certain eligibility periods in 2020 and 2021.

[LEARN MORE](#)





## Employee Retention Credit Eligibility Checklist: Help understanding this complex credit

The [Employee Retention Credit \(ERC or ERTC\)](#) is a complex tax credit for businesses and tax-exempt organizations that kept paying employees during the COVID-19 pandemic either when they were shut down due to a government order or when they had the required decline in gross receipts during certain eligibility periods in 2020 and 2021.

The IRS continues to see aggressive marketing that lures ineligible taxpayers to claim the ERC. While the credit is real, many promoters are aggressively misrepresenting who can qualify for the credit. In many instances, the IRS is seeing businesses and tax-exempt organizations being misled by promoters into thinking they're eligible when they are not.

As a reminder, anyone who incorrectly claims the ERC must pay it back, possibly with penalties and interest. The IRS wants to help taxpayers avoid this situation, so they prepared this question-and-answer chart to help employers figure out if they may be eligible for the credit. You can use this chart with someone who is considering claiming the credit or with someone who has already submitted a claim to the IRS.

The IRS is committed to helping taxpayers while preventing incorrect ERC claims and fraud.

### Part A: Checking your eligibility

This chart can help a business or other organization quickly decide if they may qualify for the Employee Retention Credit. This is a very technical area of the law, but this chart includes the main eligibility factors. Answer these questions in numerical order to see if you may be eligible to claim the ERC.

Eligibility questions	Next steps
<p>1. Did you 1) operate a trade, business or tax-exempt organization <b>and</b> 2) have employees and pay wages to them between March 13, 2020, and Dec. 31, 2021?</p> <p>For more info, see <a href="#">IRS.gov/ercqualified</a>. Note – Household employers are not eligible for ERC.</p>	<ul style="list-style-type: none"> <li>• If yes, go to #2.</li> <li>• If no, you aren't eligible to claim the ERC. If you incorrectly claimed ERC, see Part C.</li> </ul>
<p>2. Did your trade or business experience the required decline in gross receipts during the eligibility periods in 2020 or the first three calendar quarters (Jan. through Sept.) of 2021?</p> <p>For more info and examples, see <a href="#">IRS.gov/ercdecline</a></p>	<ul style="list-style-type: none"> <li>• If yes, you may be eligible for the ERC. You will need to confirm that your decline in receipts meets requirements. See <a href="#">IRS.gov/ercdecline</a>. If you meet the requirements, skip to Part B.</li> <li>• If no, go to #3.</li> </ul>
<p>3. Are you claiming the ERC because of supply chain issues?</p> <p>For more info, see <a href="#">IRS.gov/ercsupply</a> and the IRS legal memo on <a href="#">supply chain disruptions</a> (AM-2023-005), which includes examples.</p>	<ul style="list-style-type: none"> <li>• If yes, be extremely cautious. A supply chain disruption by itself doesn't qualify you for the ERC. Carefully review <a href="#">IRS.gov/ercsupply</a> and examples in the legal memo on <a href="#">supply chain disruptions</a> (AM-2023-005). Be sure your supplier's government order meets the criteria in #4; then go to Part B. If you incorrectly claimed ERC, go to Part C.</li> <li>• If no, see #4.</li> </ul>

Publication 5887 (11-2023) Catalog Number 94470G Department of the Treasury Internal Revenue Service [www.irs.gov](#)

## EMPLOYEE RETENTION CREDIT FRAUD

FinCEN Alert on COVID-19 Employee Retention Credit Fraud: The U.S. Department of the Treasury's (Treasury) Financial Crimes Enforcement Network (FinCEN), in close coordination with Internal Revenue Service Criminal Investigation(CI) is issuing this alert to financial institutions<sup>2</sup> on fraud schemes related to the COVID-19 Employee Retention Credit (ERC) and is urging vigilance in identifying and reporting related suspicious activity. The ERC was authorized by the Coronavirus Aid, Relief, and Economic Security (CARES) Act as a tax credit to encourage businesses to keep employees on payroll during the COVID-19 pandemic and was subsequently extended and amended three times.

## A.B. 485 SOCIAL COMPASSION IN LEGISLATION

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Social Compassion in Legislation A.B. 485



REAL TIME WAGMOR UPDATES



Follow me on Instagram

**LA COUNTY ANIMAL CONTROL "DO NOT ADOPT TO MELISSA BACELAR"**

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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.

If she attempts to adopt from any of our centers notify Administration immediately.

G. Needler #264 Admin

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





# SCIL Social Compassion in Legislation

**October 31, 2023**

## **Lawsuit Against Wagmor Pets Highlights Serious Allegations of 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.

# Social Compassion in Legislation

We appreciate the support from Social Compassion in Legislation. Our dedicated work over the years has focused on raising public awareness and uncovering the troubling operations led by Melissa Bacelar, the proprietor of Wagmor Pets Rescue and The Wagmor.

Accuracy is paramount in addressing the unethical activities of Wagmor Pets. The current class action lawsuit specifically pertains to allegations related to backyard breeders, not puppy mills. Clear and precise information is essential for effective resolution.

This has been a prolonged and arduous journey, marked by significant challenges. We acknowledge the attention our efforts have garnered from the press and the public, which underscores the magnitude of our mission.

The misrepresentation of "rescue dogs" as a commercial commodity diminishes the true significance of the term 'rescue.' The procurement of puppies from breeders incentivizes further breeding, directly contributing to the reduction of available homes for dogs in kill shelters. Despite being fully aware of the annual euthanasia of thousands of dogs in municipal shelters, Wagmor continues to misrepresent puppies which they purchased, motivated by high profit margins.

The importation of dogs into California from breeders for profit further erodes the sanctity of the term 'rescue.' This practice exacerbates the crisis in U.S. kill shelters, where millions of animals are euthanized each year. Importing puppies perpetuates the problems in California while promoting designer dogs over mixed breeds commonly found in animal shelters. Furthermore, substantial funds raised under a fraudulent narrative, including the significant profits earned by Melissa Bacelar, could be redirected to address the plight of homeless animals in our local communities.

Over the years, we have observed the profound and detrimental impact of Wagmor's operations on both 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 WAGMOR

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12 *Attorneys for Plaintiffs,*

13  
14 **SUPERIOR COURT OF CALIFORNIA**  
**COUNTY OF LOS ANGELES – UNLIMITED CIVIL**

15 [REDACTED], an individual; [REDACTED]  
16 [REDACTED], an individual; [REDACTED],  
an individual; on behalf of themselves and all  
17 others similarly situated,

18 Plaintiffs,

19 vs.

20 MELISSA BACELAR, an individual;  
WAGMOR PETS, a California non-profit  
corporation; WYLDER'S HOLISTIC PET  
21 CENTER, INC. dba THE WAGMOR, a  
Delaware corporation; and Does 1 through 10,  
22 inclusive,

23 Defendants.

Case No.: 22STCV20771

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

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

**DEMAND FOR JURY TRIAL**

Electronically Received 12/29/2022 04:39 PM  
REVOLVE LAW GROUP  
LLP  
2601 Main Street, Suite 1200  
Irvine, California 92614  
(833) 775-4557

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



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



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



ALLEGATIONS MADE AGAINST MELISSA BACELAR, FOUNDER OF WAGMOR

## 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.

[FIND OUT MORE](#)

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## Neglects to Provide Adequate Medical Care to Puppies Before Adoption

Please review court documents and lawsuit of 8 different people who adopted dogs that suffered from serious fatal & contagious conditions. All but one died.

[FIND OUT MORE](#)

## CLASS ACTION RECORDS

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ANSWER TO UNVERIFIED COMPLAINT (pdf)

[DOWNLOAD](#)

JOINT STATEMENT CONFERENCE (pdf)

[DOWNLOAD](#)

**STIPULATION AND PROTECTIVE ORDER – CONFIDENTIAL DESIGNATION ONLY (pdf)**

[DOWNLOAD](#)

**JOINT STATEMENT RE- INFORMAL DISCOVERY CONFERENCE [LOCATION OF PLAINTIFF'S DEPOSITION] (pdf)**

[DOWNLOAD](#)

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

[DOWNLOAD](#)

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

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

[DOWNLOAD](#)

Joint Status Conference Statement (pdf)

DOWNLOAD

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

DOWNLOAD

Bacelar Served by Sheriff (pdf)

DOWNLOAD

Intent to Suspend or Revoke AG of CA (pdf)

DOWNLOAD

## ALLEGATIONS OF WAGMOR'S UNETHICAL RESCUE PRACTICES

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## **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 to Animal Control for animal abuse.

FIND OUT MORE

## **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:**

- a. dogs are being purchased and passed off as "rescues," and dogs are not being seen by a licensed veterinarian prior to sale;
- b. dogs are being medically treated by an unlicensed individual in her home in lieu of proper veterinary care;
- c. puppies exposed to parvovirus and distemper are going home with unsuspecting new owners 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 end clothing and shoes for her and her children (Gucci included), gardening for her home, pool care for her home, tutoring for her children, trips to a MedSpa, LaMer skin products, video games from GameStop, a monthly Peloton membership, vacation rentals with AirBnB, shoes from Nike, snowboard rentals, orders from [www.getroman.com](http://www.getroman.com), toys for her children and meals while on vacation at Big Bear Lake, her husband's Audi, school tuition for her children, barbershop haircuts, nail salons, dentistry, housekeeping for her home, camp for her children, and exorbitant monies have been spent throwing lavish birthday parties for her 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 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 exaggerates the backstory of a dog or outright falsifies stories.

FIND OUT MORE

## **WAGMOR'S CHARITABLE STATUS IS DELINQUENT**

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

[FIND OUT MORE](#)

## **ADOPTION FEES HIGHER THAN ALLOWED BY STATE LAW**

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

[FIND OUT MORE](#)

## **CELEBRITY ADOPTIONS PROVIDE INCREASED MEDIA FURTHER PROMOTING WAGMOR PETS**

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  
5 T: 714-617-8390; F: 714-617-7628

6 Jill L. Ryther, Esq. (SBN 266016)  
7 **RYTHER LAW GROUP**  
8 8560 West Sunset Blvd., Suite #500  
9 West Hollywood, CA 90069  
10 Ph: (424) 274-4706; Fx: (310) 773-9192

11 **Attorneys for Plaintiffs** Cathy Green, Jonathan Fairbanks,  
12 Kristina Warner, Kimberly Wright, Seth Waskow and  
13 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*

**SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES - CENTRAL DISTRICT**

11 CATHY GREEN, an individual, individually  
12 and on behalf of the public; JONATHAN  
13 FAIRBANKS, an individual, individually  
14 and on behalf of the public; KIMBERLY  
15 WRIGHT, an individual, individually and on  
16 behalf of the public; and KRISTINA  
17 WARNER, an individual, individually and on  
18 behalf of the public, SETH WASKOW, an  
19 individual, individually and on behalf of the  
20 public; YASMIN WASKOW, an individual,  
21 individually and on behalf of the public,

PLAINTIFFS,

vs.

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

DEFENDANTS.

Case No. BC598098

**VERIFIED THIRD AMENDED  
COMPLAINT FOR:**

1. Negligent Misrepresentation
2. Fraud-Intentional Misrepresentation
3. Fraud-Concealment
4. Intentional Infliction of Emotional 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]**

08/18/2016

**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.

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

DOWNLOAD

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

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

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ANSWER TO COMPLAINT (pdf)

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

DOWNLOAD

Case Number- 21STCV42715 ELLIE MOSSER VS WYLDERS HOLISTIC PET CENTER INC,  
ET AL. (pdf)

DOWNLOAD

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

DOWNLOAD

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

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

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**WYLDERS FOUNDATION TAX FILING 2016 (pdf)**

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**WYLDERS FOUNDATION TAX FILING 2017 (pdf)**

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**ANSWER TO VERIFIED COMPLAINT (pdf)**

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**Case No- 21STCV42715 COMPLAINT FOR DAMAGES (pdf)**

[DOWNLOAD](#)

**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)**

[DOWNLOAD](#)

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

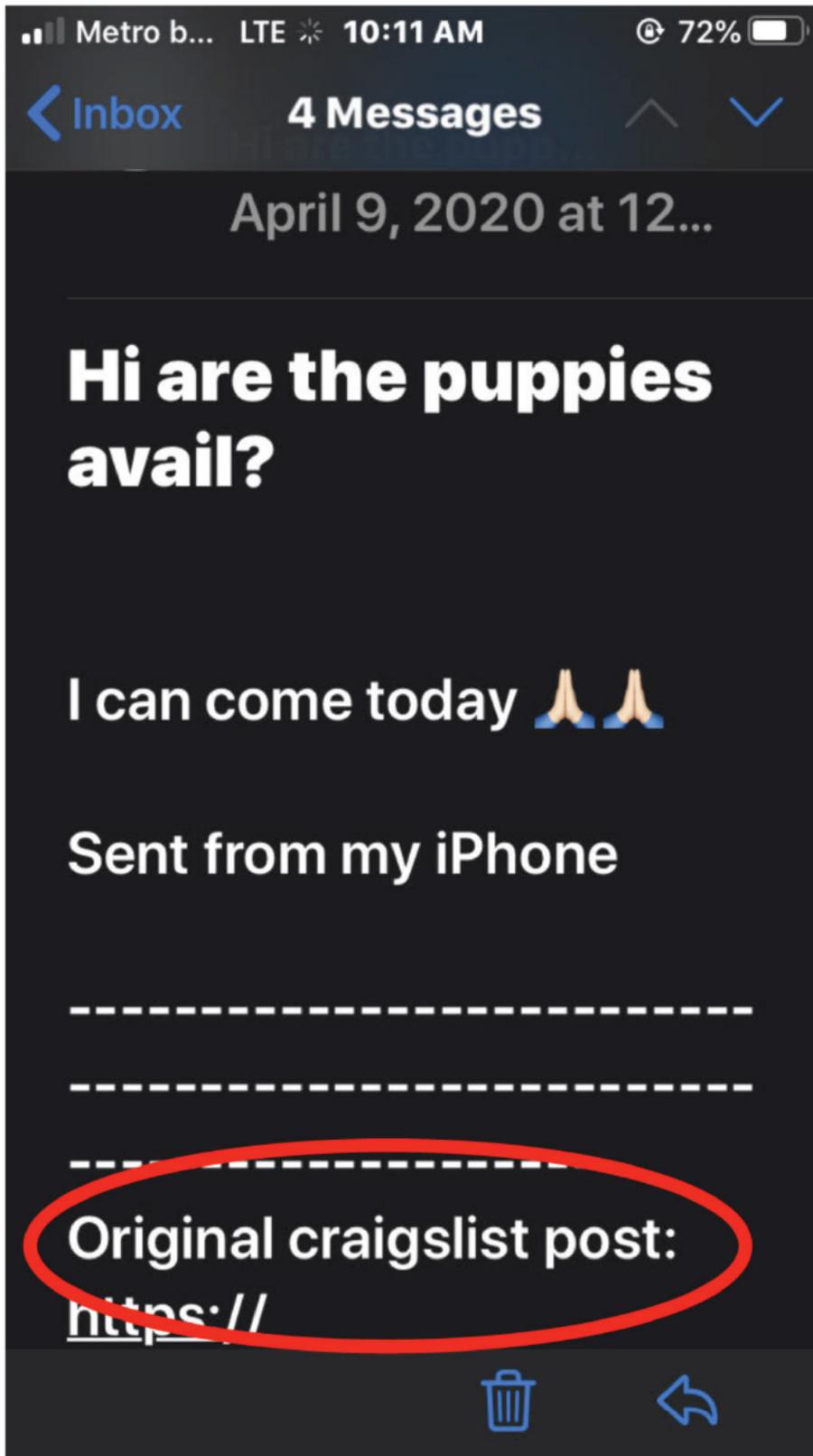
DOWNLOAD

## PROOF OF MELISSA BACELAR BUYING PUPPIES

---

[Download PDF >](#)





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.



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 one of the dogs at the store was a carrier? But why just him

I have no freaking clue. And he was with you for 7 days before I adopted. Other puppies would be sick too.

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.

Right. I have no idea where they

08/18/2016



iMessage



## FREQUENTLY ASKED QUESTIONS

---

Why was this website created? 

---

Have we asked Ms. Bacelar about her questionable practices? 

---

Is our goal to defame Melissa Bacelar? 

---

Does Ms. Bacelar save dogs? 

---

Don't puppies in puppy mills need saving too? What's wrong with that? 

---

## CONTACT US / SUBMIT A TIP

---

### REPORT AN INCIDENT / WAGMOR STORY



Message



Attach Files

Attachments (0)

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

SEND

This site is protected by reCAPTCHA and the Google [Privacy Policy](#) and [Terms of Service](#) apply.

## 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**

Copyright Disclaimer: Under Section 107 of the 1967 Copyright Act, allowance is made for an otherwise-infringing “Fair Use” of copyrighted material. Such uses would further a Non-Profit’s purposes such as criticism, comment, news reporting, education, and research.

Copyright © 2024 The Truth About Wagmor Pets



STATEMENT

TAXES

RECORDS

MISINFORMATION

CELEBRITIES

LATEST

RESCUE RESOURCES

PENDING LITIGATION



## **Exhibit 2**



[HOME](#)

[ADOPTION](#)

[DONATE](#)

[HELP](#)

[EVENTS](#)

[PRESS](#)

[ABOUT](#)

[BoD](#)

[CONTACT](#)

[US](#)

[US](#)

## Dedicated to Connecting Pets and People!

Shelter Hope Pet Shop was created to aid shelter pet adoptions, promote education and bring awareness to the communities we serve. We are the first and only volunteer humane pet shop partnering with companies, such as NewMark Merrill, who donate store front space in busy shopping locations in order to assist us with community outreach and shelter pet adoptions. Shelter Hope Pet Shop is a unique, large scale business model, which aims to eliminate puppy mill pet shops in our malls across the nation.

Shelter Hope Pet Shop provides a fun, friendly place where visitors and volunteers can meet and interact with animals needing adoption. You can also visit Shelter Hope Pet Shop for pet merchandise and know your dollars are going directly back to help save the lives of homeless pets.

**We are a non-profit volunteer-based pet shop that showcases shelter animals available for in-store adoption.**



## Passion

Kim Sill the founder of Shelter Hope is passionate about stopping the mass produced puppies created for profit by breeders and puppy mills.

After years of working with LCA and Cesar Millan-Shelter Hope became the model for many humane shops to follow.



Finding love  
can be easier  
than you ever  
thought it was...

## Shelter Hope Bachelor



### Covid 19 has changed the way we show our animals.

Until further notice shelter hope is still open during our regular hours but will only be taking appointments for interviews. If you see an animal on our website please call us during our business hours to make an appointment to do a meet and greet.

- Wednesday though Saturday 11 a.m. to 5 p.m.
- Sunday 11 a.m. to 4 p.m.

If you want to drop off donations please do so during those hours. [Contact Us](#) for more information.



### Whats happening at Shelter Hope, Thousand Oaks?

Shelter Hope Pet Shop, Thousand Oaks (SHPS TO) is a not-for-profit, charitable, volunteer-based organization devoted to: aiding in and facilitating shelter and rescue pet adoptions; promoting education and awareness within the communities we serve; and making a positive impact in the lives of shelter and rescue animals and their adopters, as well as local shelters.

Located in the Janss Marketplace, SHPS TO provides a friendly, inviting place where visitors and volunteers can meet and interact with shelter or rescue animals needing adoption. This retail environment provides a pleasant setting where we can introduce shelter and rescue pets to adopters who may never consider visiting a shelter.

### How You Can Help Shelter Hope Pet Shop, Thousand Oaks?

- We run our store with volunteers...come spend time with the dogs....they will love you forever!

- Foster a dog at night... the more help we have, the more we can rescue pets and support our community!
- [Donate](#) supplies for our foster pets or new items for sale in our store.
- Make a financial contribution or lead a fundraiser.
- Have a pet-related service in the area? Become a community partner through offering free or discounted services for pets adopted through SHPS TO.
- Contact (805) 379-3538 or email us at [info@shelterhopepetshop.org](mailto:info@shelterhopepetshop.org) to ask how else you can support SHPS TO.

## How You Can Help Within Our Community

Please visit our [local shelters](#) or work with a rescue group to adopt a dog or cat. Adopt and save a life!

For more information on low cost vet clinics, rescue group contact info, etc..., please call (805) 379-3538 or email us at [info@shelterhopepetshop.org](mailto:info@shelterhopepetshop.org).



## Saved in America

Founder Kim Sill would like to invite you to view her documentary film “Saved In America”, her journey to expose the cruelty that exists in the American pet industry, which has led to the Shelter Hope Pet Shop.

For more information visit the official website at <http://savedinamericathefilm.com/>.



## Subscribe to Our Newsletter!



Your name

Your email

Subject

Your message (optional)

Submit

“A dog will teach you unconditional love.  
If you can have that in your life,  
things won't be too bad.”

Robert Wagner – Actor

Shelter Hope Pet Shop could not operate  
without your generous donations.  
We graciously accept donations by;



Online



While You Shop



By Phone

A teal-colored graphic shaped like a house, containing contact information for Shelter Hope Pet Shop. At the top center of the house is a white paw print icon. The text is white and centered within the teal shape.

**Shelter Hope Pet Shop**  
193 N. Moorpark Rd. East, Suite F  
Thousand Oaks, CA 91360  
Tel: (805) 379-3538

Mon: Closed	Fri: 11am-5pm
Tue: Closed	Sat: 11am-5pm
Wed: 11am-5pm	Sun: 11am-4pm
Thu: 11am-5pm	

Mon: Closed

Tues: Closed

Wed: 11 a.m. – 5 p.m.

Thu: 11 a.m. – 5 p.m.

Fri: 11 a.m. – 5 p.m.

Sat: 11 a.m. – 5 p.m.

Sun: 11 a.m. – 4 p.m.

## **Exhibit 3**



# thetruthaboutwagmor pets

Follow

Message



137 posts

2,327 followers

7,801 following

## The Truth About Wagmor Pets Rescue

Public Service

Wagmor is doing less than you may think to help dogs. A lot less. Know who you're adopting from and who you're donating to. Learn more.

[www.thetruthaboutwagmorpets.com](http://www.thetruthaboutwagmorpets.com)



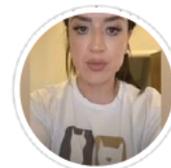
TEAM TRUTH



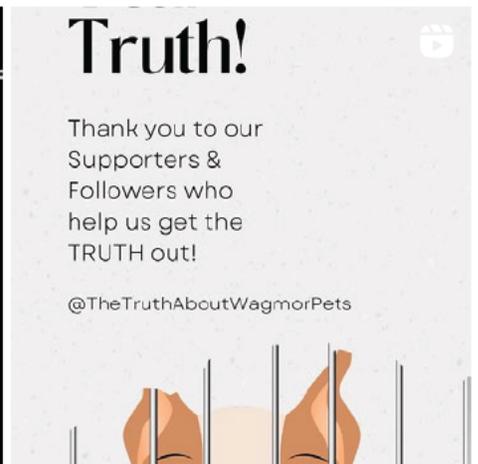
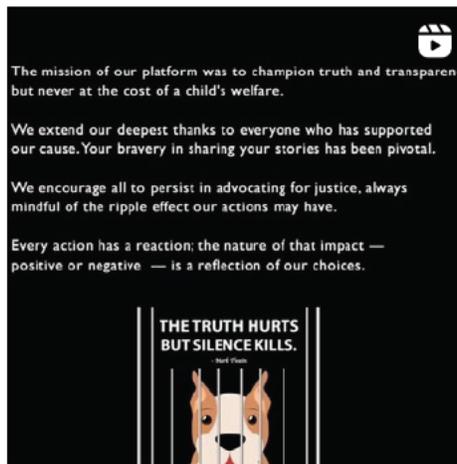
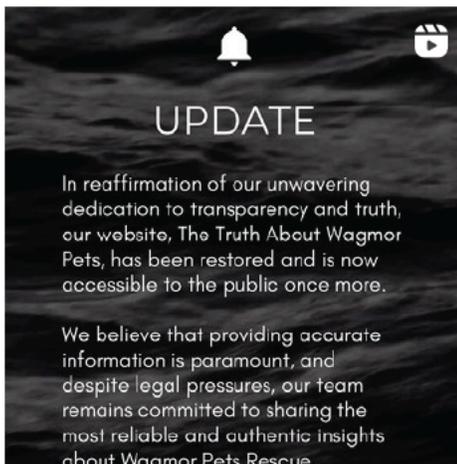
RED LISTED



Animal Welf...



UnethicalRe...



Log into Instagram

Log in to see photos and videos from friends and discover other accounts you'll love.

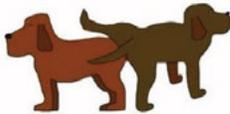




lethargy and a loss of appetite. Veterinarians recommend that owners avoid boarding their dog if it shows symptoms.



The "Turn"



Second Stage of Coitus

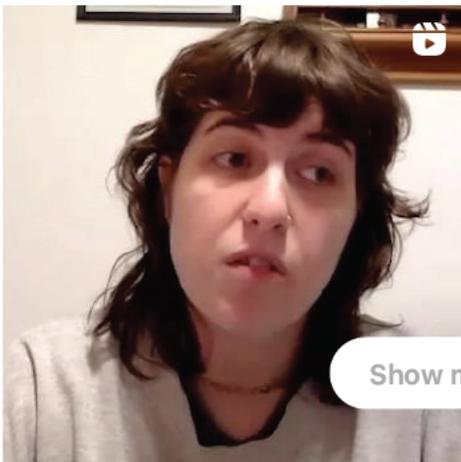


## consider this:

THE ADOPTION FEE WAS RETURNED VIA VENMO. @DOGSINNEED. THE DONATION ACCOUNT.

ADOPTION FEES GO TO THE PET HOTEL BANK ACCOUNT VIA SQUARE CREDIT CARD TRANSACTIONS.

THE MONEY COLLECTED FOR THE ADOPTION FEE WAS KEPT AND DONATION MONEY WAS USED TO REFUND ADOPTERS FOR THEIR PUPPY THAT HAD DIED VIA VENMO.



Show more posts from [thetruthaboutwagmorpets](#)

### Related accounts

See all

littlebigpawspet...

barkley\_westlake

holistapet

loemrescue

li

Log into Instagram

Log in to see photos and videos from friends and discover other accounts you'll love.

**Exhibit 4**

shelterhope\_petshop

Follow

Message



2,716 posts

8,298 followers

642 following

**Shelter Hope Pet Shop**

Animal Rescue Service

**LOCAL FOSTERS NEEDED!**

Non-profit dog rescue at the Janss Marketplace in T.O.

15,000+ lives saved and counting

193C N Moorpark Road, Thousand Oaks, California 91360

[linktr.ee/shelterhope](https://linktr.ee/shelterhope)



News



Thank You



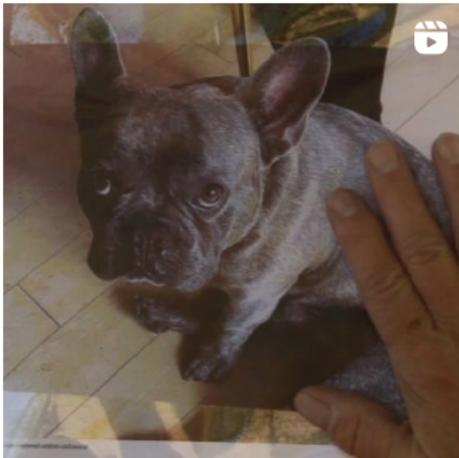
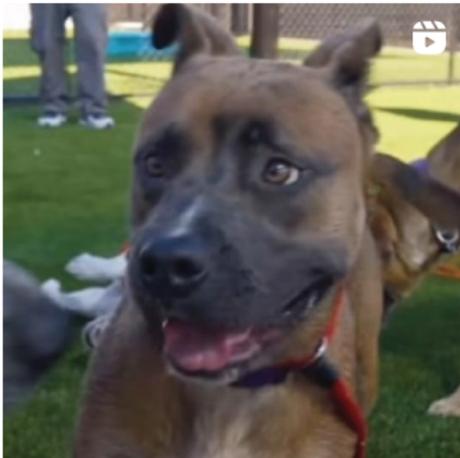
Available



Scam Alerts!



Kim Cam



# Instagram

Log In

Sign Up



**LOS ANGELES COUNTY ANIMAL CARE & CONTROL** | redefining CARE

## ATTENTION!

**SUPERVISOR KATHRYN BARGER AND LA COUNTY ANIMAL CARE AND CONTROL PARTNER FOR PALMDALE SPAY/NEUTER CLINIC**

The Department of Animal Care and Control (DACC) and Supervisor Kathryn Barger are proud to announce an upcoming spay/neuter clinic in the Antelope Valley.

The latest spay/neuter clinic is scheduled for Tuesday, February 20 at the Palmdale Animal Care Center, one of the highest-risk care centers in Los Angeles County. By offering accessible spay/neuter services to pet owners in need, Supervisor Barger and DACC aim to slow the tide of unwanted litters and provide a sustainable solution to the systemic challenges facing L.A. County animal care centers, particularly in the North County.

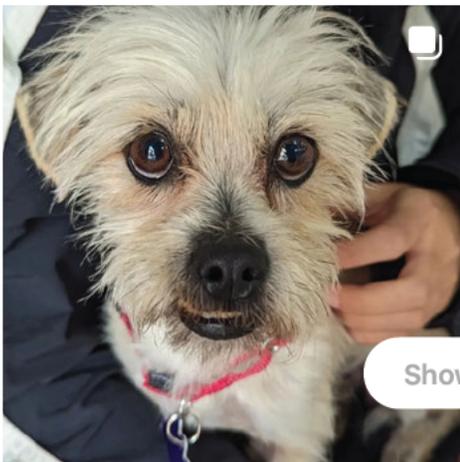
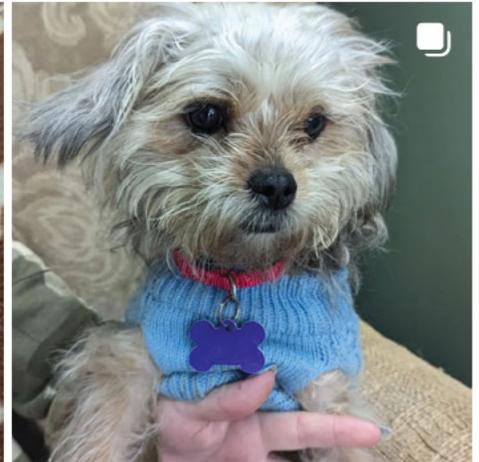
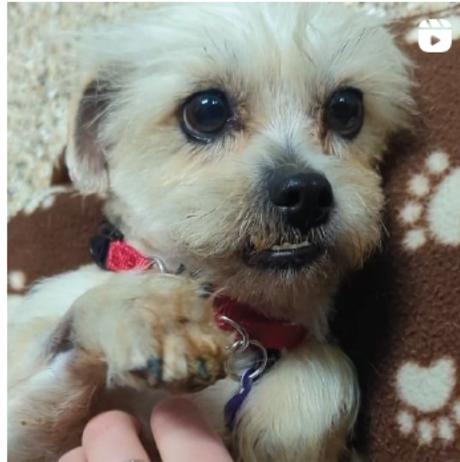
"Our animal care centers are overcrowded with pets awaiting loving families," said Supervisor Kathryn Barger. "I truly hope the community embraces and accesses the clinic's services. As pet owners, it's our responsibility to ensure we prevent more dogs and cats from ending up in shelters. Spaying or neutering your pet is the best way to make sure more animals aren't without a home. This is one of the most loving things we can do for our pets."

Low-cost spay/neuter events are routinely hosted by DACC at their seven care centers as part of a comprehensive and award-winning pet retention program, **Safe And Easy**, which also includes frequent vet/therapist wellness events to provide preventative care at no cost to pet owners.

For the February 20 event, pet owners must apply for a **Spay/Neuter voucher** to be considered and can contact [SpayNeuterProgram@lamaccare.com](mailto:SpayNeuterProgram@lamaccare.com) for more information.

WE RECOGNIZE THE URGENT NEED TO ADDRESS THE MOST CHALLENGING CASES OF PET OVERPOPULATION. THROUGH THE GENEROUS SUPPORT OF SUPERVISOR KATHRYN BARGER, WE ARE EMPLOYING TO TARGET THE MOST VULNERABLE AND NEEDING THE MOST SUPPORT AND PROVIDING A SUSTAINABLE SOLUTION TO THE SYSTEMIC CHALLENGES FACING THE COUNTY.

DACC'S ONGOING EFFORTS TO ENHANCE PET OVERPOPULATION THROUGHOUT THE COUNTY ARE SUPPORTED BY SEVERAL PARTNERS. WE WOULD LIKE TO THANK THE BOARD OF SUPERVISORS, THE BOARD OF COUNTY ADMINISTRATORS, AND THE BOARD OF COUNTY SUPERVISORS FOR THEIR SUPPORT AND COMMITMENT TO ANIMAL CARE AND CONTROL. WE WOULD ALSO LIKE TO THANK THE PALMDALE ANIMAL CARE CENTER FOR PROVIDING A SUSTAINABLE SOLUTION TO THE SYSTEMIC CHALLENGES FACING L.A. COUNTY ANIMAL CARE CENTERS, PARTICULARLY IN THE NORTH COUNTY.



## PUPDATE: PET ADOPTIONS

We're thrilled to announce the approval of funding by the Board of Supervisors to reduce pet adoption fees through the Community Concerns General Fund.

**Adoption Fees through June 2024:**  
 Cat Adoptions \$10  
 Dog Adoptions \$20



Show more posts from shelterhope\_petshop

### Related accounts

See all

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LA West Valley A...

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VIDA Rescue

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## **Exhibit 5**

Oklahoman.com Oklahoma husky rescue says Calif. charity taking credit for its work



Sep 25 • Dale Denwalt

FOX 11 More than 70 dogs rescued from Ohio; How you can adopt the pups in SoCal



May 31, 2023

City Watch L.A. Pet-Shop Ban Promised to End Puppy Mills – Why is Local “Rescue” Offering Dogs from Iowa Breeder?



May 8, 2023

Los Angeles Times Studio City rescue helps dozens of abandoned dogs in Lancaster



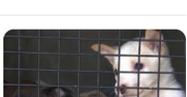
Apr 5, 2023 • Terry Castleman

KTLA Los Angeles 700 dogs rescued from puppy mill in Iowa; 53 available for adoption in Studio City



Apr 30, 2023 • Erin Myers & Will Conybeare

NBC Southern California Dogs on Brink of Death Rescued From Lancaster ‘Dog Dumping’ Ground



Apr 4, 2023 • Bailey Miller

Entertainment Tonight Wagmor Pets Owner Melissa Bacelar Explains How Celebrity Dog Adoptions Work



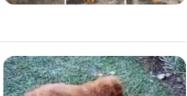
May 20, 2021 • Carly Sloane

Audacity Jack’s Mutt Matchup - Wagmor Pets Week 4



Mar 28, 2022

yahoo/entertainment L.A. Rescue Criticized After Kris Jenner Adopts Puppy From Same Litter as Chrissy Teigen’s Dog



Jan 7, 2020 • Georgia Slater

People 29 French Bulldogs Saved from Meat Markets Frown to Los Angeles to Find Forever Homes



May 11, 2021 • Kelli Bender

greenmatters Celebrity Pet Matchmaker Shares Tips for Adopting Your Dream Dog



May 20, 2021 • Sophie Hirsh

P Patch Bring Home A New Dog At Wagmor’s Adoption Event



Apr 16, 2021 • Kenan Draughorne

THE ASSOCIATED PRESS #BettyWhiteChallenge raising money and awareness for animals



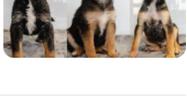
Jan 14, 2022 • Glenn Gamboa & Haleluya Hadero

Audacity Jack’s Mutt Matchup - Wagmor Pets Week 3



Mar 21, 2022

NBC Southern California ‘Be More Like Betty’ Mural Goes Up in LA Benefitting Cause Dear to Her Heart



Jan 12, 2022 • Heather Navarro

Entertainment Tonight Wagmor Pets Teams Up With ‘The Ellen DeGeneres Show’ to Celebrate National Puppy Day



Mar 23, 2022 • Carly Sloane

Audacity Jack’s Mutt Matchup - Wagmor Pets Week 2



Mar 13, 2022

Entertainment Tonight Ellen DeGeneres, Jennifer Aniston and More Celebs Love Wagmor Pets, Owner Melissa Bacelar Explains Why



Mar 17, 2021 • Carly Sloane

Audacity Jack’s Mutt Matchup - Wagmor Pets Week 1



Mar 7, 2022

LA Daily News This L.A. pet rescue harnesses star power to help dogs find homes



Ju 28, 2022 • Susan Hornik

CBS LOS ANGELES French Bulldogs Rescued From China Arrive In Southland



May 7, 2021

KMPH Fox 26 Miley Cyrus adopts stray dog taken in by Valley firefighters



Aug 27, 2020 • Liz Gonzalez

P Patch Street Dogs From Thailand Seek Fresh Start In Studio City



Apr 13, 2021 • Kenan Draughorne

Entertainment Tonight Artist Corie Mattie Creates a Mural to Honor Betty White With a Charitable Component for Wagmor Pets



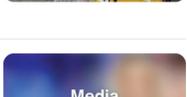
Jan 17, 2022 • Carly Sloane

Are Celebrity Pet Adopters Getting Special Treatment From This Animal Rescue Organization?



Jan 9, 2020

Lucy Hale Introduces Her Adorable New Puppy: ‘Meet Ethel’



Feb 6, 2021 • Kaitlin Reilly

Daily Mail Horrific moment 100 dogs covered in fleas and feces are rescued from hoarder’s California home



Dec 15, 2020 • Marlene Lenthang

US How Steve Kasee Surprised Jenna Dewan With ‘Best Holiday Gift’



Dec 29, 2021 • Diana Cooper

KABC-TV Nearly 2 dozen neglected dogs rescued from Riverside County kennel



Jun 24, 2021

Cute Overload! Meet Dwayne Johnson’s New Rescue Dog



Ju 14, 2022

wagmor pets Search results Save



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**PROOF OF SERVICE**

*Bacelar, et al. v. Kim Sill, et al.*  
Los Angeles County Superior Court Case No.: 24STCV01638

I, Renee Miramontes, declare that I am over the age of 18 years, employed in the County of Los Angeles, and not a party to the within action; my business address is 827 Deep Valley Drive, Suite 209, Rolling Hills Estates, CA 90274.

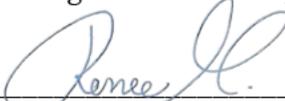
On **February 28, 2024**, I served the foregoing: **DECLARATION OF KYLA DAYTON IN SUPPORT OF SPECIAL MOTION TO STRIKE COMPLAINT** on the interested parties in this action by placing  the original  a true copy thereof, enclosed in a sealed envelope with postage pre-paid, addressed as follows:

**\* See Attached Service List \***

BY ELECTRONIC SERVICE. I served the foregoing document(s) on interested parties by using the electronic filing service ACE ATTORNEY SERVICE to serve and file documents electronically as mandated by the Los Angeles County Superior Court. The documents were electronically transmitted to the e-mail addresses of the persons set forth the above.

(STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **February 28, 2024**, in Rolling Hills Estates, California.

  
\_\_\_\_\_  
Renee Miramontes

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**SERVICE LIST**

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*Bacelar, et al. v. Kim Sill, et al.*

Los Angeles County Superior Court Case No.: 24STCV01638

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