



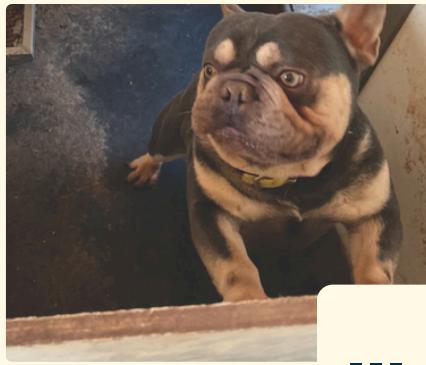
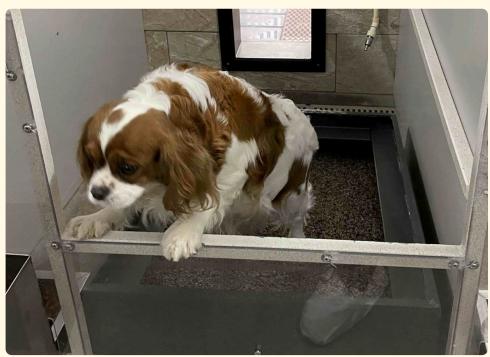
2025 PUPPY MILL UPDATE:

No Consequences for USDA-Licensed Dog Dealers



A review of USDA oversight in 2025

These are the dogs the USDA saw in 2025 ...



... and left behind.

The USDA fails to protect dogs in puppy mills

The USDA's job is to ensure that individuals and businesses that breed, sell, exhibit, research or transport animals for profit are providing humane care as required by federal law. This includes the hundreds of thousands of dogs who are used by commercial breeding facilities to produce puppies sold in pet stores and online, for research or otherwise sight-unseen by a buyer. The wholesale production and sale of dogs for profit creates serious risks for exploitation. These dogs, who are quite literally hidden in dark barns and invisible to the public eye, are among our country's most vulnerable.

The ASPCA has reviewed and analyzed thousands of inspection and enforcement records of USDA-licensed dog dealers published by the USDA or obtained through Freedom of Information Act requests. They paint a picture of what "USDA-licensed" looked like in 2025 — what the USDA is and is not doing to prevent and address pervasive issues that harm dogs.

- ▶ The USDA licensed hundreds of dog dealers who had ***histories of failing to provide care to dogs.***
- ▶ USDA inspection reports detail over **680 violations** at dog-breeding facilities across the country.
- ▶ ***One out of every six*** inspected dog dealers had a violation.
- ▶ ***ZERO*** dog dealers lost their license.
- ▶ ***ZERO*** dog dealers paid any fines.
- ▶ ***ZERO*** suffering dogs were removed from any facilities.

A quarter of a million dogs held in USDA-licensed facilities

The Animal Welfare Act is intended to ensure the humane treatment of animals, and it sets minimum welfare requirements for animal businesses such as puppy mills and other commercial breeding operations, zoos and research institutions. These standards are minimal at best and nowhere near what most people would consider humane. The USDA is responsible for implementing the Animal Welfare Act, including licensing and registering businesses, inspecting facilities and investigating and taking action against violators.

The USDA oversaw 16,000 licensed or registered facilities in 2025. Only around a third of these facilities were inspected within the year. The USDA documented over 3,000 violations, with one out of every five inspections revealing a violation.

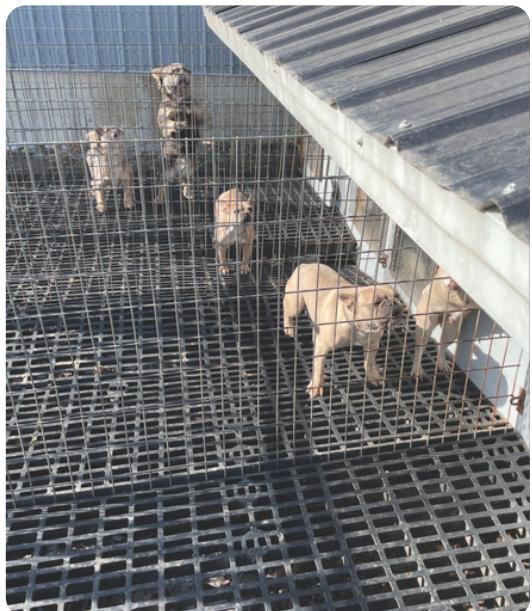
For dogs alone, around 2,500 commercial dog dealers were licensed this year. These include both dog breeders who breed high volumes of dogs to produce puppies and brokers who purchase and resell puppies for profit. Commercial dog dealers in full compliance with the law can keep dogs in stacked, wire cages only six inches longer than the dog in any direction. Female dogs can be bred continually, churning out litter after litter. At any given time, there are a quarter of a million dogs and puppies held in USDA-licensed facilities.

USDA licenses more businesses than it can inspect

Every year since 2021, with the addition of online pet transportation services, the number of licensees and registrants has increased, up to 17,500 last year. In 2025, the overall number of licensees and registrants decreased for the first time to 16,000. This is still nearly double the number of licensees and registrants in 2020 and prior. With only 80 inspectors, the USDA clearly licenses more businesses than it can inspect. *In 2016, 81% of all businesses were inspected. In 2025, only 35% of businesses were inspected.*

Access to information suffered this year

The USDA experienced significant staffing cuts — 20,000 in the first half of 2025 — resulting in delays in the posting of public information, such as inspection reports and the processing of records requests, including photographs. The department responsible for licensing under the Animal Welfare Act shrunk its staff by 25%. The government shutdown at the end of 2025 also significantly delayed this information. The photographs in this report represent just a fraction of the total incidents the USDA observed at licensed dog dealing facilities.



Dogs suffered in USDA-licensed facilities

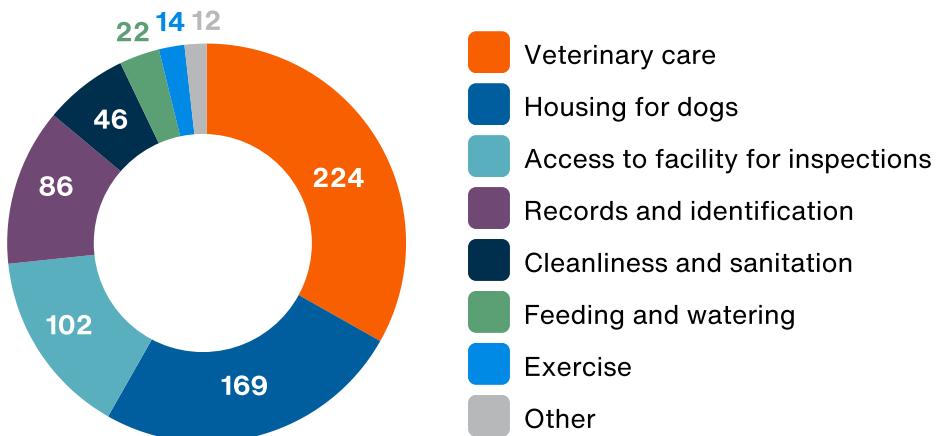
In 2025, the USDA documented over **680 instances** where licensed dog dealers failed to meet the minimum standards required by law.

These instances included:

- Dogs in tiny cages, living in filth, without clean food or water.
- Dogs with painful, bleeding wounds or suffering from deadly diseases without any veterinary care.
- Dogs who were left to die unnoticed from preventable causes or with no explanation at all.



Violation Types for Dog Dealers in 2025



Office of Inspector General audit confirms problems

In 2025, the Office of Inspector General (OIG) released an audit of the USDA's oversight of commercial dog breeders and dealers. They found **the ongoing pattern of continued violations “poses a threat to the well-being and safety of their dogs, leaving them vulnerable to neglect, mistreatment, and suffering.”** The OIG visited dog breeders who were previously found “noncompliant” by the USDA but had remained licensed. The OIG concluded “at risk” facilities were not inspected often enough, inspections were not thorough, inspectors did not properly document welfare issues and 80% of the licensed breeders were still not providing required care.

33% of the violations found were for **veterinary care issues** — dogs were sick or injured, and some died, without having been seen by a vet or given medical care

Norman Yoder, Apple Creek, Ohio: The USDA saw a Boston Terrier with an **oozing, bloody, inflamed wound** on his leg. The licensee stated that he “**had not noticed**” before the inspector pointed it out, and the dog had not received any treatment or medical care.



Elizabeth Yutzy, Marianna Yutzy, Jonas Yutzy, Pomona, Missouri: A 1-month-old puppy was **weak and lethargic, coughing and wheezing and would not open her right eye**. The licensees stated **she had been like that since the day before**, but they had not consulted with a veterinarian. Instead, they treated the puppy with water, Karo syrup and electrolytes and injected her with penicillin formulated for livestock.



EllaMae Brubaker, Thorp, Wisconsin: The USDA found two dogs wounded and in pain. The first dog was **limping** and had **wounds covering her entire body**. The licensee stated the dog had been in a fight two days prior but had not taken her to a veterinarian. The second dog had **open wounds** on her stomach and legs, **oozing and dripping red and black liquid**. She had trouble moving because of the pain and was lethargic. This dog also had not been seen by a veterinarian.



Dustin Frakes, Avon, Illinois: A young Cavalier had **conjunctivitis in both eyes, swollen and pus-filled**. The licensee had not noticed the condition, and no treatment or procedures had been implemented to prevent it from spreading to other dogs.

Edna Yoder, Sugarcreek, Ohio: The USDA identified a dog with a dental condition so severe that his **gums had receded, exposing the roots of his teeth**. Multiple teeth were missing, and the remaining teeth moved when the inspector lightly touched them with his finger. The facility had not provided any treatment or taken the dog to a veterinarian, stating that they “**did not think that veterinary care was necessary at this time**.”

Dogs were housed in **tiny cages** too small for them to turn around, in **dangerously high temperatures** or in **unsafe conditions** that led to **injuries or fights**



Heath Meyers, Grundy Center, Iowa: The USDA saw an adult Bichon panting and in pain with her **back foot stuck in the mesh flooring** of her enclosure. It took them a few minutes to free her, and, when they did, she walked with a **limp**. The facility confirmed this was not the first time this had happened.

Marjorie Walker, Nangua, Missouri: Dogs were kept in buildings with heat indices reaching 109.6 degrees Fahrenheit. The fans were coated in dirt and debris, and the licensee stated the air conditioner had not been working for “a while.” The USDA found dogs clearly affected by the heat — **lethargic, panting and open-mouth breathing**.

Jonathon Wickey, New Haven, Indiana: A Husky became caught in the door of his kennel. Unable to free himself and unnoticed by the licensee, **he hung by one arm until he died**.

Donna Frakes, Roseville, Illinois: Four separate USDA inspections found dogs in **too small** enclosures. Four puppies were kept in a cage just two feet in either direction. Adult dogs were crammed into cages barely large enough for them to turn around, or into cages with too many other dogs, leaving none with enough space. This facility had over 200 dogs.

First Class Puppies, Bluejacket, Oklahoma: This large brokering facility sees thousands of puppies pass through its doors each year. A USDA inspection found that puppies were crowded in **enclosures nearly half the size of what the law requires**.

Raymond J Yoder, Fresno, Ohio: Enclosures failed to safely contain a puppy, allowing him to **crawl out** through a half-foot wide gap into a washdown gutter. The puppy entered an adjacent enclosure, where he was **killed** by the three dogs that lived there.



Dogs were **living in filth**, covered in feces, urine, cobwebs and hair, with only **dirty food and water** or **none at all**

Sadie and Daniel Yoder, Jasper, New York: A nursing female with three puppies was housed **without access to water**. When inspectors provided her water, **she drank for two minutes nonstop**, paused, and then began drinking again. Other dogs were kept in enclosures with only filthy water buckets caked in fur and dirt.

Charles and Debbi McGinnis, Bolivar, Missouri: Enclosures where at least 10 dogs spend their entire lives were excessively dirty, with **feces, dirt, grime and hair covering “approximately 75% of the floor space”** according to the USDA. Food containers were also covered in cobwebs and grime.

Samuel Z Brubacker, Dundee, New York: Two separate USDA inspections, months apart, found that this licensee was not cleaning enclosures properly. **Feces, hair and food waste** contaminated enclosures, and **dust, debris, cotton swabs and other trash** littered the building.

Eli Yoder, Baltic, Ohio: Food bowls were not cleaned and found covered in cobwebs, rust, and **“ants too numerous to count** going into and out of the bottom of the feeder.”

Becky and Leonard Goodman, Ringling, Oklahoma: The USDA repeatedly documented the horrible conditions in which dogs were living at this facility. **Rodent feces, nests and dead mice** littered the floors. Pools of standing **water with algae and debris** filled the buildings. **Roaches** crawled over open food and lay dead in water bowls. Enclosure walls were **rusted** and **broken**, with sharp, jagged edges.



Dog dealers frequently turned USDA inspectors away

Commercial dealers are required to make their premises available for unannounced inspections, and they get to choose which times work best for them. However, 150 times in 2025, licensees turned the USDA away. These “attempted inspections” are a serious violation, and, coupled with the decreased staffing and support the USDA had this year, they pose a significant drain on the USDA’s already limited resources. Yet the USDA frequently allowed repeated attempted inspections to go uncorrected and unpunished, even when they had reason to believe dogs were at risk.

Custom Creatures or K&M Pets, Saginaw, Michigan: This dog broker has had nine attempted inspections in the last year and a half. USDA inspectors have been repeatedly turned away. The USDA briefly suspended their license in 2024 because of the conditions they found but has not taken any action since, and allowed them to continue to operate without oversight.

Dog dealers went years without an inspection

The only way the USDA can document a violation is through inspections. However, there is no requirement that the USDA conduct inspections with any specific frequency. Dog dealers can — and do — go years without inspectors setting foot on their property.

Tiffanie’s LLC, Frankford, Missouri: This high-volume dog broker ships puppies to pet stores around the country — to Florida, New Jersey, Nevada, North Carolina and many more states. The last time the USDA inspected them was over two years ago, in October 2023. Despite hundreds of puppies passing through their doors day after day, the USDA has allowed them to operate without any oversight for years.



Inspection Numbers

- **30% of commercial dog dealers** who were actively licensed in 2025 never received a compliance inspection.
- Overall, the USDA conducted around **2,000 compliance inspections**, and around 1,000 other licensing inspections, for dog dealers.
- For dog dealers who had an inspection, **one out of every six had a violation** documented during the year.

USDA records don't tell the whole story

The USDA limits the number of observed animal welfare violations that show up on a licensee's record. They do this by:

- Directing inspectors not to record certain issues
- Cutting documented findings from inspection reports
- Allowing facilities to fix issues during the inspection
- Conducting unofficial and unrecorded site visits
- Allowing commercial dealers to operate under multiple license numbers

Courtesy Visits

For years, the USDA has used a "customer service" approach to enforcing the law, treating licensees as customers instead of regulated entities. One program under this approach allowed facilities to request a "courtesy visit" of their facility. During these announced, scheduled visits, the agency would come out to the facility and give suggestions or guidance on how to meet requirements under the law. If inspectors observed any violations during a courtesy visit, they were not allowed to record them or create a report of any kind. For years, this policy concealed violations and allowed licensees to get away with even more cruelty. The ASPCA [reported on the failures of courtesy visits](#) to improve compliance and filed a lawsuit challenging this policy. In 2025, the judge ruled in our favor, affirming that the USDA must record all violations on official inspection reports.

There are few barriers to becoming licensed

Dog dealers who want to be licensed complete a one-page application, pay a \$120 fee and pass just one of three scheduled licensing inspections. That's all it takes.

In fact, 100% of commercial dog dealers who asked for a USDA license in 2025 got one. We've identified dealers who received a license despite long histories of problematic care documented by the USDA, animal welfare issues documented by state agencies, formal warnings and even involvement in criminal cases with animals. In some cases, the USDA found violations the same day they determined licensees were in compliance and ready to be licensed.

In the USDA's own words:



Currently [the agency] does not verify all information about whether an applicant has any disqualifying conditions for license. This is particularly true for new applicants who have no record with the agency. For instance, there is no verification process if a new applicant indicates they have no law violations or pleas of nolo contendere on their license application, and [the agency] currently relies on complaints or other external sources to bring falsified information to their attention.



-USDA Program Assessment and Accountability Report

The bottom line: A USDA license is no assurance that dogs are provided humane care.

The response to violations

When violations are recorded, the USDA has multiple enforcement tools at its disposal to respond. These include:

- Suspending licenses
- Revoking licenses
- Issuing fines
- Removing suffering animals

Instead, the agency chooses time and again to only send a letter — called an Official Warning. This letter serves no enforcement purpose, it is not a first step toward further action, and it does not impact a licensee's ability to renew their license. It also does not deter future violations, as we have seen licensees continue to violate even immediately after receiving a warning letter.

Yet the agency appears to rely even more on warnings as the sole response to direct, critical violations. In addition, frequently in 2025, warnings were not even signed by **IES, the enforcement department**, but rather just by the inspections department.

In 2025, the USDA issued 255 warnings total, with around 30 warnings for dog dealers.

Investigative and Enforcement Services

The Investigative and Enforcement Services department, or **IES**, is responsible for investigating violations and pursuing enforcement actions against violators. The enforcement process can take years and historically begins when violations are referred to IES. We request records of those referrals regularly. However, for the first time, our records request for January through June 2025 came back as "no records found" — indicating no referrals had been made. What this might mean about the agency's process is still unknown.

Teresa Rauch, Bolivar, Missouri: In beginning of the year, the USDA documented a dog with severe dental disease, her gums receded so much that the root of a tooth was visible. The USDA issued a warning letter. Shortly thereafter, another USDA inspection found even more dogs with severe dental disease, gums red and swollen and teeth covered in hard plaque. The USDA issued a warning letter. Since then, the USDA has documented four more violations, including one for a dog with a noticeable limp who received no treatment. The USDA has taken no action to stop her from violating, and the warnings do not appear to have deterred her from violating. *Rauch keeps over 100 dogs in her facility.*

In the USDA's own words:



[The agency] does not appear to have any documented criteria for escalating a case to investigation or other types of enforcement action.

-USDA Program Assessment and Accountability Report

No consequences for violations

While enforcement of the Animal Welfare Act has always been low, in 2025 it took a deeper drop.

**The USDA documented over 680 instances of harm to dogs.
They took no action in any case.**

- ▶ ZERO dog dealers lost their license.
- ▶ ZERO dog dealers paid any fines.
- ▶ ZERO new cases were opened for dog dealers.
- ▶ ZERO dog dealers were referred to the USDA's investigation department (IES).
- ▶ ZERO cases were brought against dog dealers by the U.S. Department of Justice.
- ▶ ZERO dogs were removed from any USDA-licensed facilities.

The trend is the same for all licensees and registrants, not just dog dealers

For all the businesses the USDA licenses and registers, enforcement was extremely minimal, even less so than in previous years.

Federal law allows for a maximum penalty of \$14,575 per violation. For all licensees and registrants, the USDA documented more than 3,000 violations in 2025, indicating they could have collected more than **\$43.5 MILLION**. ***They collected only \$5,000.***

Other organizations have also reported on this trend in greater detail.

Even a single violation is grounds for license revocation. Over 1,000 individual licensees had a violation documented in 2025, meaning all 1,000 could have faced revocation. ***The USDA revoked only 1 license.***

The agency has the authority and responsibility to remove animals who are suffering in licensed facilities. There are hundreds of thousands of animals in USDA licensed facilities, and at least 200,000 animals in facilities *with documented violations this year*. **They removed ZERO animals.**

The USDA has allowed the facilities it oversees to disregard the Animal Welfare Act. Dogs and other animals are suffering because of it.



Methodology

Data in this report were compiled using information provided by the USDA through its [Inspection Report Public Search Tool](#), [Animal Welfare and Horse Protection Actions database](#), [List of Active Licensees and Registrants](#) and through Freedom of Information Act (FOIA) requests to the USDA, DOJ and state agencies. Dog dealers were identified as Class A or B USDA-licensees with dogs or puppies in their inventories.

Throughout this report, the year 2025 is used to refer to Fiscal Year 2025, which ran from October 1, 2024 through September 30, 2025. This is also true for other years.

All photographs included in this report are of USDA licensees taken this year. The USDA does not post photos proactively. All photos were received by the ASPCA through FOIA requests. The USDA only takes photos in very limited circumstances. It can take the USDA months to respond to such requests.

