



**SETTLEMENT AGREEMENT**

THIS AGREEMENT is entered into by the United States Department of Agriculture, Animal and Plant Health Inspection Service (“APHIS”), and Joe Freeman and Caryl Freeman, with reference to the following facts:

1. At all times mentioned herein, Joe Freeman and Caryl Freeman operated as a Dealer under the Animal Welfare Act (7 U.S.C. § 2131 *et seq.*) (the “AWA”) at the facility located at 9424 Bethel Rd., Seneca, MO 64865.
2. APHIS has documented evidence of Joe Freeman and Caryl Freeman’s non-compliance with the AWA and the regulations promulgated thereunder (9 C.F.R. § 1.1 *et seq.*), and specifically, has documented evidence of Joe Freeman and Caryl Freeman’s failure to provide adequate veterinary care and husbandry to dogs, as required by the AWA regulations and AWA standards for the humane handling and treatment of animals (9 C.F.R. §§ 2.40, 3.1-3.19).
3. APHIS has not instituted an administrative enforcement action based on the findings described above in paragraph 2.
4. APHIS and Joe Freeman and Caryl Freeman have determined to settle the issues related to the potential violations of the AWA and the regulations and standards issued thereunder, as described above.

NOW, THEREFORE, it is agreed as follows:

5. Joe Freeman and Caryl Freeman admit that the Secretary has jurisdiction in this matter, and waive oral hearing and further procedure.
6. Joe Freeman and Caryl Freeman consent and agree to the following:
  - a. As of the date Joe Freeman and Caryl Freeman sign this Settlement Agreement, AWA license 43-A-5696 is hereby revoked.



b. Joe Freeman and Caryl Freeman and any partnerships, firms, corporations or other legal entities that they control or in which they have a substantial interest, financial or otherwise, are permanently disqualified from (a) obtaining an Animal Welfare Act license, and (b) engaging in activities governed by the Animal Welfare Act (7 U.S.C. § 2131 *et seq.*) and regulations issued thereunder (9 C.F.R. § 1.1 *et seq.*), either directly or indirectly, on or off 9424 Bethel Rd., Seneca, MO 64865.

7. Joe Freeman and Caryl Freeman consent and agree that their failure to comply with the terms of this Settlement Agreement shall automatically void paragraph 8 below, and that APHIS shall have the right to immediately institute enforcement proceedings against Joe Freeman and Caryl Freeman based upon the non-compliant items documented at 9424 Bethel Rd., Seneca, MO 64865, in connection with animal welfare investigation MO11093 AC, and any future violations, and to pursue any and all remedies available to APHIS under the AWA.

8. For and in consideration of Joe Freeman and Caryl Freeman's agreements and actions described in paragraph 6 above, and the promises and admissions of Joe Freeman and Caryl Freeman set forth herein, APHIS agrees not to institute an administrative or civil enforcement action against Joe Freeman and Caryl Freeman in connection with the alleged AWA violations documented in animal welfare investigation MO11093 AC.

APHIS and Joe Freeman and Caryl Freeman warrant and represent that their respective representatives, whose signatures appear below, have the authority to execute this Settlement Agreement and to bind each of the parties, respectively, to this Settlement Agreement.



Joe Freeman and Caryl Freeman

Signature: 

Date: 6-17-12

U.S. DEPARTMENT OF AGRICULTURE  
ANIMAL AND PLANT HEALTH INSPECTION SERVICE

  
Signature:   
Robert J. Huttenlocker  
Director  
  
Investigative and Enforcement Services  
Animal and Plant Health Inspection Service  
United States Department of Agriculture

Date: 6-17-12

7/11/12