

STATE OF MICHIGAN
SIXTH CIRCUIT COURT
COUNTY OF OAKLAND

LUCILLE PTASZNIK, individually,
and HIGH VIBE TRAIL RIDES, LLC,
a Michigan limited liability company,

2026-226366-CZ
JUDGE Nanci J. Grant

Plaintiffs,

Case No. 2026-
Hon.

v

COUNTY OF OAKLAND,
MORGANN MARIE REYNOLDS, individually,
AUBRIE MAUSOLF, individually,
HORSES' HAVEN, a Michigan nonprofit corporation,
KRISTINE DVONCH, individually, and
JOHN AND JANE DOES 1 through 10,

Defendants.

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eFiling case, for more information
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COMPLAINT AND DEMAND FOR JURY TRIAL

There is no other pending or resolved civil action arising out of the
transaction or occurrence alleged in this Complaint.

Plaintiffs Lucille Ptasznik (“Ms. Ptasznik”) and High Vibe Trail Rides, LLC (“High Vibe Trail
Rides” or the “business”), by their attorneys Flood Law, PLLC, state the following for their Complaint
against Defendants:

INTRODUCTION

1. On July 16, 2026, an Oakland County Animal Control officer went to the farm at 2471 Meadowood Lane where Ms. Ptasznik keeps her horses, spent 38 minutes there, and produced an official Oakland County Animal Control report that stated the horses were in good shape and had access to hay, water, and shelter. He took no action.

2. On July 30, 2026, a licensed equine veterinarian walked every pasture and scored every horse. The 37 horses Plaintiffs own averaged 5.04 on the nine-point Henneke body condition scale. Thirty-five of the 37 scored within the normal range of 4 to 6. The other two were already on management plans. Fresca, who scored 3.5, was on a weight-building ration and restricted from regular work. Chanel, who scored 7, was scheduled for more consistent work to bring her weight down.

3. On August 4, 2026, a County animal control officer told a private citizen that “they were going to take the horses from Lucie.” In the same call she said she had already been on the property without permission. She then asked him not to repeat what she had said because it would cost her job. No County officer had examined a horse since July 16.

4. On August 12, 2026, the County took 37 horses. It also took a four-year-old gelding that its own return and tabulation describes as “privately owned.” It left other boarders’ horses on the same property, including one kept in a field with the horses it removed. During the search, and Oakland County Sheriff’s Office deputy remarked to Ms. Ptasznik that this was a waste of “\$100,000” of resources.

5. The warrant affidavits relied on a “subject matter expert” who had never seen the horses. She was the executive director of the private rescue that then took custody of them. The affidavits failed to disclose this. After the seizure, that same expert wrote that the herd’s body condition scores “were overall good.”

6. The County then demanded \$63,478.60, on penalty of forfeiture. Of that figure, \$46,828.60 was a flat “initial intake cost” of \$1,265.64 per horse, fixed on the day of the seizure, before any veterinarian had completed an examination of any horse.

7. On September 1, 2026, the Oakland County Prosecutor’s Office declined to authorize charges and declined the forfeiture. Thirty-six horses came home on September 2. Knox did not come home. Knox was a 14-year-old gelding whom the veterinarian had scored at five of nine and found sound at a walk 13 days before the seizure. He was euthanized in the facility’s custody. Because no one has contacted Ms. Ptasznik to give her any information about this, it is unclear who ordered Knox to be euthanized, when he was euthanized, who euthanized him, where he was euthanized, and what became of his remains after they were sent to Michigan State University.

8. Plaintiffs bring this action under 42 USC 1983 and Michigan law to recover the damages caused by the seizure of their herd on warrants obtained through false statements and material omissions, by an officer’s warrantless entry onto the property where their horses were kept, and by the destruction of Knox without notice to his owner.

THE PARTIES, JURISDICTION, AND VENUE

9. Plaintiff Lucille Ptasznik is an individual who resides at 2685 West Commerce Road, Milford Township, Oakland County, Michigan.

10. Plaintiff High Vibe Trail Rides, LLC is a Michigan limited liability company. Ms. Ptasznik is its sole owner. It operates a guided trail riding and lesson business from 2471 Meadowood Lane and 2685 West Commerce Road, both in Milford Township, with rides that depart into Kensington Metropark.

11. Plaintiffs together own the horses seized on August 12, 2026. The County’s Notices of Animal Seizure and Intent to Forfeit name Ms. Ptasznik as the owner. The veterinary records name

High Vibe Trail Rides as the owner. Plaintiffs plead their respective ownership interests in the alternative.

12. 2471 Meadowood Lane is owned by Richard George. Under an agreement with Mr. George, Ms. Ptasznik pays \$305 per horse per month, invoiced monthly, for hay, grain, housing, shelter, water, Mr. George's care of the horses kept there, use of the property (including its fields, barns and riding areas), and free access to the property, including space for an office, a tack room and a parked trailer. Under that arrangement, Plaintiffs occupy and use the barns, run-ins, dry lots, and enclosed pastures in which their horses are kept for Plaintiffs' use.

13. Defendant County of Oakland (the "County") is a Michigan county and a political subdivision of the State of Michigan. Oakland County Animal Control is a division of the County and is not a separate legal entity.

14. Defendant Morgann Marie Reynolds is, and at all relevant times was, an animal control officer employed by the County. She participated in executing the search warrant at 2471 Meadowood Lane on August 12, 2026, photographed both properties, and wrote the truck slips for the removed horses. She is sued in her individual capacity.

15. Defendant Aubrie Mausolf is, and at all relevant times was, an animal control officer employed by the County. She is the officer in charge of Oakland County Animal Control Incident No. 260003173 and the affiant on the search warrants executed on August 12, 2026. She is sued in her individual capacity.

16. Defendant Horses' Haven is a Michigan nonprofit corporation, LARA ID 800816920, that operates a private equine rescue. It is recognized by the IRS as a 501(c)(3) tax-exempt organization, EIN 38-3259872. Its registered office is 8257 N. Latson Road, Howell, Livingston County, Michigan, and its resident agent is Defendant Kristine Dvonch. Under an arrangement with

the County, it took custody of the seized horses on or about August 12, 2026 and held them until September 2, 2026.

17. Defendant Kristine Dvorch is the Executive Director of Horses' Haven. The County's report lists her as its "Subject Matter Expert." She participated in executing the search warrant, examined the horses on site, and compiled the County's written summaries of the herd's condition while her organization held the horses. She is sued in her individual capacity.

18. Defendants John and Jane Does 1 through 10 are employees, agents or contractors of the County or of Horses' Haven whose conduct is described below, including the person or persons who decided on and carried out the euthanasia of Knox. Their identities are known to Defendants but not yet to Plaintiffs. Plaintiffs will move to amend to substitute their true names once they are identified in discovery.

19. The amount in controversy exceeds \$25,000, exclusive of interest, costs and attorney fees. This Court has jurisdiction under MCL 600.605.

20. This Court has concurrent jurisdiction over Plaintiffs' claims under 42 USC 1983. *Howlett v Rose*, 496 US 356; 110 S Ct 2430; 110 L Ed 2d 332 (1990).

21. This Court has personal jurisdiction over each Defendant. The County is located in Oakland County, the individual Defendants reside or work in Michigan and acted in Oakland County, and Horses' Haven is a Michigan nonprofit corporation. MCL 600.701; MCL 600.711.

22. Venue is proper in Oakland County under MCL 600.1615 and MCL 600.1629. The events occurred here, the property is here, and the County exercises its governmental authority here.

GENERAL ALLEGATIONS

A. The business and its horses.

23. High Vibe Trail Rides offers guided trail rides at a walk, six days a week, most of them for first-time and beginner riders. It also offers private rides seven days a week, and only private rides

on Tuesdays. Additionally, it also offers corporate retreats and various events, including cookouts and yoga classes. Its horses are the working assets of the business.

24. On August 12, 2026, Plaintiffs owned 37 horses, with an aggregate value of \$364,000. Knox is carried on that valuation at \$7,500.

25. The business kept a written horse tracker. For each horse, it records the field, the workload (“OFF,” “Light,” “Moderate,” or “Heavy”), shoeing, feed notes, and care notes. The care notes record instructions from Dr. Hillary Lobar and Dr. Austen Epp, including an antihistamine protocol for horses with irritated eyes, wound treatment for Paloma, and a note that Dr. Epp needed to return to remove Legend’s stitches and staples.

26. The barn also kept a “Horse Care” whiteboard. The County photographed it on August 12, 2026. Officer Mausolf wrote in the County’s report that it showed Atlas, Onyx, Paloma, Poppi and April were not to work, and that Bingo, Rita, Rumor, Thor, Rolex and Fresca were to have light work only.

27. The same whiteboard posted the barn’s feeding rules, including “All horses working get 1 scoop grain before rides” and “Hay + Water ALWAYS.” It also listed a weight-booster ration for ten named horses, individual treatment instructions for Paloma, Fresca, Rolex and Putt Putt, and a medication list: Equioxx for Godiva, Rita, Rumor, and Bingo, and Benadryl for Fresca, Paloma, and Raya. A card posted beside the whiteboard listed Moose, Dior, Vogue, Fresca, and Paloma under the heading “Deworm,” each with the entry “8/4,” and under the heading “Due,” the entry “8/11.” On August 11, 2026, Barn Manager Emily Brown came to the farm to give those horses their scheduled dewormer, but found that she was two doses short. She returned on August 12, 2026 with the additional dewormer to complete the scheduled deworming. That was the day the County executed the warrants and removed the horses.



B. On July 16, 2026, the County investigated and cleared the property.

28. At 16:18:13 on July 16, 2026, the County's dispatch received a telephone complaint about Ms. Ptaszniak's horses. The dispatch narrative reads as follows:

"CALLER STS THAT THE OWNER LUCILLE PTASZNIK IS STILL TAKING THE HORSES OUT FOR HOURS IN THE DANGEROUS WEATHER CONDITIONS// SHE IS NOT GIVING THEM ACCESS TO FOOD OR WATER"

29. The complainant field of the County's Computer-Aided Dispatch (CAD) record reads "ANON-MEGAN MACDONALD." Ms. MacDonald leased a horse at the business from on or about March 26, 2024 through May 2024 and guided fewer than 20 rides in May and June 2024. The business ended its relationship with her in June 2024. On information and belief, she had not been on the property since.

30. Officer J. Lee, badge 4445, was dispatched at 16:21:37, arrived at 17:10:25 and cleared at 17:48:29.

31. Officer Lee entered the following disposition in the County's case report, a true copy of which is attached as Exhibit 1:

“THE HORSES ON THE PROPERTY WERE IN GOOD SHAPE AND HAD ACCESS TO HAY, WATER AND SHELTER WHEN I ARRIVED THERE WERE HORSES TIED OUT FOR AN UPCOMING RIDE THAT WERE BEING FEED AND WATERED.”

32. In the same entry he recorded that the property owner, Richard George, “WOULD LIKE TO BE CONTACTED FIRST UNLESS A WARRANT IS PRESENTED TO ENTER ONTO THE PREMISES.”

33. Every box on the report's evidence list is blank. No box under “Action Requested” is checked, no citation was issued, and no further action was taken on Incident No. 260002932.

C. Veterinarians were treating these horses in the weeks before the seizure.

34. On March 5, 2026, Dr. Austen Epp of Creekside Equine Veterinary Services, PLLC billed Ms. Ptasznik for vaccinations, a Coggins test, two 1,000 ml bottles of Panacur dewormer, Equioxx, and an examination of Godiva with a written plan to treat her with an anti-inflammatory and reevaluate in seven to 10 days. Dr. Epp also performed Coggins testing for Ms. Ptasznik on April 1, April 21 and July 16, 2026.

35. On May 28, 2026, Dr. Lobar of Huron River Equine Veterinary Services, PLLC examined Maverick, a 20-year-old gelding, for chronic weight loss. She ran bloodwork and a fecal egg count, floated his teeth, dewormed him, prescribed a weight-gain diet, and discussed a cardiology referral. Her record notes that he had been dewormed about two months earlier, “as was the rest of the herd.” She treated him again on June 11 and, on June 12, 2026, recommended and performed humane euthanasia for progressive disease, with inflammatory bowel disease or neoplasia suspected.

36. On July 22, 2026, Dr. Lobar examined Rita, Bingo and Rumor. For each, she recorded vital signs and examination findings. She returned Rita and Bingo to light, walk-only work with written diet plans and instructions to protect them from horses that might take their feed.

37. On July 27, 2026, 16 days before the seizure, Dr. Epp repaired a laceration over Legend's left temple with sutures and surgical staples. His record directs that the sutures and staples be removed in 10 to 14 days.

38. On July 30, 2026, Dr. Lobar walked the pastures at both properties, examined the herd, and assigned each horse a Henneke body condition score on a written scoring sheet. A true copy of her July 30, 2026 records is attached as Exhibit 2.

39. The Henneke scale runs from one (emaciated) to nine (extremely fat). A score of five is moderate, and four to six is the accepted normal range for working horses.

40. For the 37 horses Plaintiffs own, the mean score was 5.04 and the median was 5.0. Thirty-five of the 37 scored between four and six, and 29 scored five or higher.

41. One horse scored below four. Fresca, a twenty-year-old Belgian mare whom Dr. Lobar described that day as "new to farm for about 2 months," scored 3.5. Dr. Lobar wrote: "recommend no work until weight gain occurs."

42. One scored seven: Chanel, a 14-year-old Paint mare. The business's horse tracker records her as "Overweight, needs more consistent work."

43. Dr. Lobar recorded that no horse showed nasal discharge, swollen lymph nodes, coughing, or other signs of respiratory or communicable illness at the time of the exam. She collected nasal swabs from five horses, one from each field on the main farm, for strangles testing: Armani, Nacho, Chanel, Vogue, and Whiskey, a horse owned by a boarder. Dr. Lobar submitted all five samples to Equine Diagnostic Solutions under a single laboratory order. On August 5, 2026, the

laboratory reported each sample as "Not Detected" for *Streptococcus equi*, the bacterium that causes strangles.

44. The same records show a herd under active management. Gaston's fecal egg count was 400 eggs per gram, and he was dewormed during the visit. Ember's count was zero. Louie was found with bot eggs, with instructions to comb them off and deworm him. Paloma was recorded as "currently treating for proud flesh, not in work." Horses with girth or wither rubs were ordered out of work until healed.

45. Dr. Lobar recorded that the farm's ration of Nutrena All Stages 14% feed with free-choice round-bale hay "should be adequate to meet the needs of most of the horses in the program." She recommended vitamin E for horses with thin topline, written care protocols, a quarantine pen for new arrivals, and replacement of broken hay feeders.

46. Each of these records names Ms. Ptasznik or High Vibe Trail Rides as the client. Each was available to any County officer who asked for it. No County officer asked for them before the seizure.

D. The County built its case by telephone, from former employees, without speaking to the owner.

47. The seizure was conducted under Oakland County Animal Control Incident No. 260003173. Officer Mausolf is the officer in charge. Her first narrative entry is dated July 30, 2026 at 10:01 a.m.

48. That entry records telephone interviews with former employees and purchasers of horses, including Montana Rakay, Brenda Brierly, Isabela Stawiarski, Hailey Hayes, Jessica Chapman and Lenna Kramer, an in-person interview with Amber McMaster, an interview with Meredith DeRonne, and photographs from Erin Wiles. Several of those witnesses asked to remain anonymous.

49. The entry ends: "I have received enough information to send for a search warrant for both properties."

50. Nothing in the County's report records that, before seeking the warrants, Officer Mausolf or any other County officer examined any horse, spoke with Ms. Ptasznik, her barn manager or any current employee, contacted Dr. Lobar or Dr. Epp, or requested any veterinary, farrier, or feed record.

51. The same entry shows that Officer Mausolf knew of Officer Lee's July 16 visit. It states that on that visit Mr. George told Officer Lee a search warrant would be needed to enter again. It does not mention Officer Lee's finding that "the horses on the property were in good shape and had access to hay, water and shelter."

52. The photographs attributed to Ms. Wiles were taken on July 30, 2026, the day Dr. Lobar walked every pasture and scored every horse.

53. Plaintiffs' records show that several of these witnesses had limited or dated contact with the herd. The County's report describes Ms. Stawiarski as an employee until July 28, 2026, but she last guided a ride on or about November 21, 2025 and never returned to work, though she was still on work group chats and came to an event on July 17, 2026. Ms. McMaster went on four training rides in March 2026 and helped guide four rides in May 2026. Ms. DeRonne claims to have been a trail guide during the summer of 2025 and that she has known Ms. Ptasznik for six years. However, she only attended two training rides, on July 18 and July 28, 2025. The County's report states that Ms. Rakay worked at the business for about two months in June and July 2026. However, she was hired in September 2025 and her last working day was on or about June 14, 2026. She also bought a horse from Ms. Ptasznik in November 2025. She only removed her horse from the property sometime in mid- to late-July 2026.

54. The affidavits also rely on photographs attributed to witnesses who, by Plaintiffs' records, were no longer working with the herd when the photographs were taken. The July 18, 2026 photograph is attributed to Ms. Stawiarski, who had last guided a ride about eight months earlier. The

July 19 and July 26, 2026 photographs are attributed to Ms. Rakay, who had last worked at the business about five weeks earlier. The affidavits do not explain how, or from where, either witness took them.

55. On information and belief, Ms. McMaster is employed by Oakland County Animal Control. The affidavits describe her only as a former employee of the business.

56. In a later entry, Officer Mausolf wrote that Megan MacDonald (spelled “McDonald” in the report) “is not a complaining witness for this case and has no involvement.” The County’s own July 16 dispatch record lists her as the complainant.

57. The County’s written policies require that “[a]ll cruelty investigations by an ACO must be performed objectively” (Section 5.3.1), direct the investigating officer to “[i]dentify the owner/caretaker of the animal(s) and interview on scene” (Section 5.3.5), and direct the officer in charge of a multi-animal case to collect and record available medical information from the owner (Section 4.9.7).

E. On August 4, 2026, Officer Reynolds said the County was going to take the horses.

58. Benjamin Skubik and Officer Reynolds were in a dating relationship for approximately four years that ended in 2026.

59. On August 4, 2026, at approximately 9:04 AM, Officer Reynolds called Mr. Skubik from (248) 807-5634, the cellular number he knew her to use during their relationship. The call lasted approximately 18 minutes.

60. During that call, Officer Reynolds told Mr. Skubik that she had previously entered the property where the High Vibe Trail Rides horses were kept, without permission.

61. During the same call she told him that “they were going to take the horses from Lucie.”

62. On information and belief, Oakland County Animal Control Supervisor Patrick Fanning was present during this call and therefore knew, as of August 4, 2026, that Officer Reynolds had told Mr. Skubik of the County’s intent to seize the horses.

63. At that time no horse had been seized, no warrant had issued, and no County officer had examined any of the horses since Officer Lee cleared them on July 16.

64. After the call, Officer Reynolds sent Mr. Skubik a text message asking him not to disclose what she had told him and stating that she would lose her job if he did. Mr. Skubik's affidavit is attached as Exhibit 3.

65. The thread shows the following messages, with spelling and punctuation as they appear:

REYNOLDS: "Do not say anything either"

REYNOLDS: "Or its my job"

SKUBIK: "Too late"

REYNOLDS: "I fucking hope your happy"

REYNOLDS: "The only good fucking job I have had and you just got my ass fired"

66. The County's written policy on cruelty cases restricts discussion of a case to those immediately involved and requires the use of secure communication channels.

67. Officer Reynolds was assigned to the seizure. She served the warrant at 2471 Meadowood Lane with Officer Mausolf and the Animal Control supervisor, photographed both properties, and wrote the truck slips.

F. The warrants.

68. Officer Mausolf swore two affidavits before Magistrate Richardson of the 52nd District Court, 1st Division: one for 2685 West Commerce Road and one for 2471 Meadowood Lane. Apart from the address, the two affidavits are the same. The warrants were received for filing on August 11, 2026. True copies of both warrants and affidavits are attached as Exhibit 4.

69. The judicial signature page of each warrant states, “ISSUED UNDER MY HAND this 11th day of August 2026,” with the “11” handwritten in the blank. The line on the 2685 West Commerce Road affidavit stating the date it was sworn is typed “Subscribed and sworn to before me this 4th day of August 2026.” A handwritten “11” is written over the typed “4.” On the 2471 Meadowood Lane affidavit, “11th” is handwritten in the blank.

70. August 4, 2026 is the day Officer Reynolds told Mr. Skubik that “they were going to take the horses from Lucie.” The County’s report records that the Wiles photographs, on which the affidavits rely, were uploaded to the case file on August 4, 2026, between 9:26 and 9:30 AM.

71. Each warrant commands the seizure of “[a]ny and all evidence of animal cruelty and violations regarding MCL 287.744, and MCL 750.50, including but not limited to any equine,” together with veterinary records, feeding schedules and receipts for equine food and medical care.

72. Paragraph J of each affidavit states: “That Affiant is unable to verify any veterinary records at this time.”

73. Officer Mausolf had not asked Ms. Ptaszniak, her barn manager, or either treating veterinarian for any record.

74. Paragraphs M through AC of each affidavit recount the statements of nine witnesses: Ms. Rakay, Ms. Brierly, Ms. Hayes, Ms. McMaster, Ms. Stawiarski, Ms. DeRonne, Ms. Chapman, Ms. Kramer and Ms. Wiles. The affidavits describe Ms. Rakay as an employee “during June and July 2026,” Ms. McMaster as an employee “from March 2026 through May 2026,” Ms. Stawiarski as an employee “until 07/28/2026,” and Ms. DeRonne as an employee “during the summer of 2025.” They do not state when any witness last saw the horses she described, apart from the dates of the photographs.

75. Every dated photograph the affidavits rely on was taken on or before July 30, 2026: May 17 (Ms. McMaster); June 29 and July 2, 3, 6, 11 and 12 (Ms. Brierly); July 18 (Ms. Stawiarski); July

19 and 26 (Ms. Rakay); and July 30 (Ms. Wiles). July 30 is the day Dr. Lobar examined and scored every horse.

76. Paragraph AD states: “That Affiant has consulted an expert witness in horse care. Kristine Dvonch is recognized as a subject matter expert in horse abuse cases in several circuit courts in Michigan.” Paragraph AE states that Ms. Dvonch “reviewed the above information and photos and recognized the same conclusions as Affiant.”

77. The affidavits do not disclose that Ms. Dvonch is the Executive Director of Horses’ Haven, the private rescue that took custody of the horses the warrants authorized the County to seize. They do not disclose that Ms. Dvonch had never examined any of the horses before Officer Mausolf swore to the search warrants.

78. The affidavits do not mention Officer Lee’s July 16 visit or his finding that the horses were in good shape with access to hay, water and shelter. They do not mention Dr. Lobar’s examinations of July 22 and July 30. They do not disclose that no County officer had examined any horse since July 16, or that no record had been requested from the owner or her veterinarians. They do not disclose that Officer Reynolds, who was assigned to the seizure, had entered the property where Plaintiffs’ horses were kept without a warrant or consent. They do not disclose that Ms. McMaster, on information and belief, is employed by Oakland County Animal Control.

G. August 12, 2026.

79. On August 12, 2026, Officer Mausolf convened at the Milford Police Department with officers of the Milford Police Department, representatives of the Huron-Clinton Metropolitan Authority (“HCMA”), which operates Kensington Metropark, the Oakland County Sheriff’s Office, a representative of the Michigan Department of Agriculture and Rural Development, the Animal Control supervisor, four other animal control officers, Ms. Dvonch, two Horses’ Haven workers, and Dr. Morgan Falk.

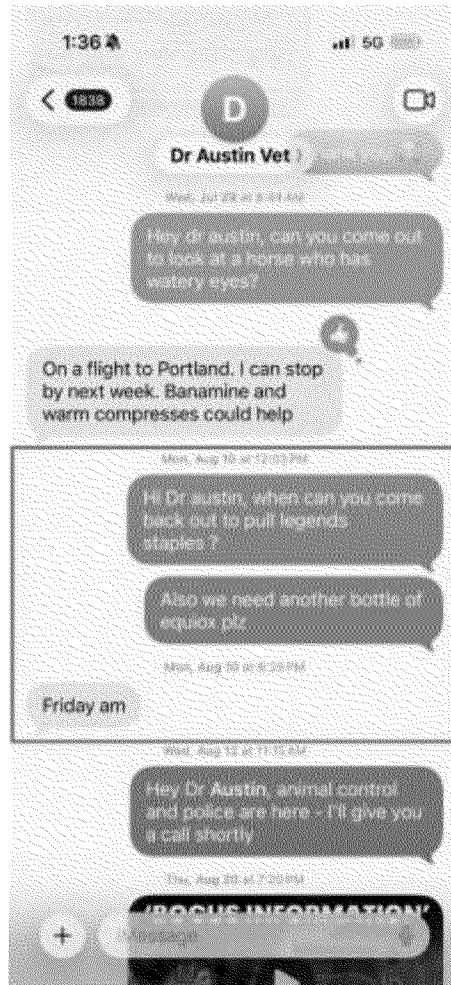
80. Officer Mausolf wrote that she “assembled a team that consisted of myself, Kristine Dvonch (subject matter expert), Dr. Falk (Veterinarian), Kristine’s two workers to help handle horses.”

81. She wrote that less than 60 minutes passed between the field examination and her decision to seize, and that “[a]t this point during the investigation, I felt as if a large number of the horses were in pain and had been neglected and needed to be seized for further medical evaluation.”

82. The County’s report places the decision to seize on August 12. Officer Reynolds said on August 4 that the horses were going to be taken.

83. During the search, Ms. Ptasznik and her barn manager told Officer Mausolf that the herd was seen by Dr. Lobar and Dr. Epp. The County did not contact either veterinarian before removing the horses. It contacted Dr. Epp on August 14 and August 18, 2026, and obtained Dr. Lobar’s records after the seizure.

84. Officer Mausolf wrote that one pasture held a horse with “an old head injury with old stitches and staples that were never removed.” On information and belief, that horse was Legend, whose laceration Dr. Epp had closed 16 days earlier on July 27, 2026 with instructions to remove the sutures and staples in 10 to 14 days. **The business’s horse tracker records that Dr. Epp “needs to come back out to remove staples and stitches.”** On August 10, 2026, the 14-day mark, Ms. Ptasznik texted Dr. Epp about removing Legend’s sutures and staples. Dr. Epp responded that he would come to the farm on Friday, August 14, 2026 to remove the sutures and staples, the 18-day mark.



85. The County removed the 37 horses Plaintiffs own. Its return and tabulation also lists “Enzo gray gelding 4 yr old,” noted as “privately owned.” A true copy of the return and tabulation is attached as Exhibit 5.

86. Two days later, Dr. Epp told Officer Mausolf that Enzo’s family “has been taking great care of him.” On July 30, Dr. Lobar had scored Enzo at 4.5 of nine. Twenty-nine of the 37 horses Plaintiffs own scored higher.

87. The County left six horses owned by Carlos and Olivia Nicozisis, a horse boarded by the Hupp family, and a horse boarded by Britt McKenzie on the same property. Officer Mausolf wrote that the Hupp horse “is mixed in with the High Vibe Trail Rides horses.”

88. The return and tabulation lists “little bay m Bingo,” and the Notice of Animal Seizure lists Bingo as female. The County’s intake describes the same horse as a “Bay pony mare, approx. 20+ years old.” Bingo is an eight-year-old gelding.

89. At 2685 West Commerce Road, County animal control officer Riley recorded that “[i]n the pasture there was access to water and hay with trees for primary shelter,” and that the barn contained baled hay and grain.

90. Photographs taken at the property during the removal show covered ribs, level topline, rounded hindquarters and full flanks on more than a dozen horses of different breeds and ages. Uniformed County officers appear in three of the frames. In one, an officer stands at the gate of a dry lot beside a tub of feed and a full stock tank. Ms. Ptasznik also took over 60 photos of the horses during the seizure, which show over two dozen horses of different breeds and ages in good health.

91. Ms. Ptasznik has never been cited for any offense involving an animal.

H. The County’s own expert found the herd’s body condition “overall good.”

92. Ms. Dvonch compiled the County’s written summary of the August 12 examinations. It states: “Body condition scores were overall good.” A true copy is attached as Exhibit 6.

93. Her later summary lists seven of 37 horses with body condition scores between three and 4.5.

94. Officer Mausolf recorded that Cash’s body condition score when seized was five of nine.

95. The County’s summary criticizes lameness, dental care, parasite control, and tack fit. It also records that four horses “were receiving the NSAID Firocoxib,” that two “were listed on High Vibes board as no work,” and that three “were listed as light work.”

96. Many horses the summaries criticize were already under documented care or restriction before the seizure. Paloma was being treated for proud flesh and was out of work. Onyx

was listed “OFF.” Rita and Bingo had been examined on July 22 and restricted to light, walk-only work, and Rumor, examined the same day, was listed for light work on the barn’s whiteboard. Fresca was out of work. Godiva had been examined by Dr. Epp and placed on an anti-inflammatory. Gaston was dewormed on July 30. The herd was dewormed in the spring of 2026.

97. Ms. Dvonch wrote the summaries while Horses’ Haven held the horses. On information and belief, Horses’ Haven was paid for their care and stood to receive the horses if the security was not paid. Further, on information and belief, Ms. Dvonch and Horses’ Haven stood to profit from the seizure of these horses.

I. The security demand.

98. On August 14, 2026, the County served Ms. Ptasznik with two Notices of Animal Seizure and Intent to Forfeit, one for each property, each reciting “Investigating animal neglect” and a 14-day deadline. Copies are attached as Exhibit 7.

99. The County’s Animal Seizure Security Deposit/Bond Information sheet states the following:

Number of Animals Seized: 37. Initial intake cost per animal: \$1,265.64. Total Initial Intake Cost: \$46,828.60. Daily Cost per Animal per Day: \$15 per day x 37. Total Cost per Day: \$555. Total Daily Cost for 30 days: \$16,650. Bond/Deposit for 30 Days: \$63,478.60.

100. The intake charge accounts for \$46,828.60, or 74%, of the demand. It was fixed on the day of the seizure, the stated beginning date for the deposit.

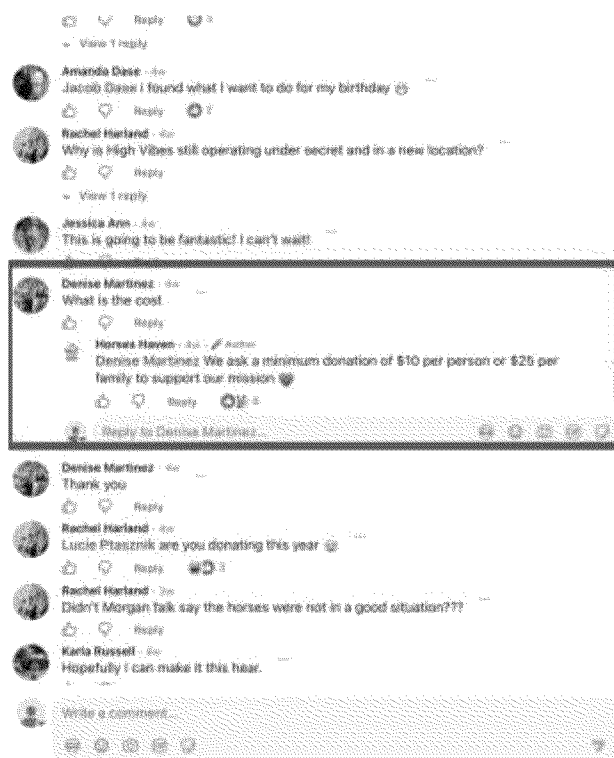
101. No veterinarian had completed an examination of any horse when that figure was set. Ms. Dvonch’s August 12 summary states that “[d]etailed exams, including radiographs are pending for all horses displaying lameness issues,” and that the next veterinary days were August 19, 20 and 21.

102. MCL 750.50(18) limits the security to an amount sufficient to secure the costs of care during a 30-day period after the animal is examined by a licensed veterinarian.

103. The County has never identified what the \$1,265.64 intake charge covers.

104. At the County's own daily rate of \$15 per horse, the cost of care for 37 horses for the 21 days they were held was \$11,655.

105. Horses' Haven solicited public donations earmarked for these horses while they were in its custody.



106. From August 12 to September 2, no one from the County or Horses' Haven asked Ms. Ptasznik what any horse ate, which horses were on medication, or which horses a veterinarian had ordered out of work.

107. On or about August 14, 2026, Lisa Howle, an attorney Ms. Ptasznik consulted, spoke by telephone with Bob Gatt, Division Manager of Oakland County Animal Control, for approximately 14 minutes. Ms. Howle twice offered to provide each horse's diet and medical information. Mr. Gatt did not accept it. The only subject he wished to discuss was the security payment.

J. The hearing request, the Prosecutor's declination, and the return.

108. On or about August 20, 2026, Ms. Ptasznik submitted a motion to the 52nd District Court, 1st Division, for a hearing under MCL 750.50, to prevent forfeiture, to set aside the security demand, and for return of the horses, and served it on Oakland County Animal Control.

109. Officer Mausolf referred the case to the Oakland County Prosecutor's Office.

110. On September 1, 2026, the Prosecutor's Office denied the warrant request and declined the forfeiture. The court had not yet accepted Ms. Ptasznik's motion for filing when the Prosecutor's Office acted, and the motion became moot before any hearing was held.

111. No part of the security was paid. The County dismissed the security demand when the Prosecutor's Office denied the warrant request.

112. On September 2, 2026, Plaintiffs, at their own expense, retrieved 36 horses from Horses' Haven, every horse seized except Knox. The horses had been held for 21 days.

113. At Horses' Haven, Ms. Ptasznik and members of her staff, including Barn Manager Emily Brown, were told they could not enter other parts of the property. Plaintiffs' barn manager was asked to retrieve Onyx from his stall herself.

114. Onyx's stall had manure packed beneath the floor mats. He wore a halter that was not the one he was seized in and was too small for his head. Both hind legs were severely stocked up, and he was lame and in apparent pain. Before the seizure, Onyx was listed "OFF" work on the barn's horse tracker and whiteboard.

115. When Ms. Ptasznik asked Horses' Haven for information about Knox's care, she was told to get it from the County.

K. Knox.

116. Knox was a 14-year-old black Tennessee Walking Horse gelding.

117. On July 30, 2026, Dr. Lobar scored Knox at five of nine, noted windpuffs on the left hind limb, found no clinical signs of strangles, and recorded that he was “[s]ound at a walk.”

118. The County seized Knox on August 12, 2026. He appears on the return and tabulation as “Dark bay G Knox,” number 15, and on the Notice of Animal Seizure as animal ID 404369. Although the County described him as dark bay, number 15 and animal ID 404369 refer to Knox.

119. The County’s August 24, 2026 veterinary summary records that horse number 15 “was sound on examination.”

120. Between August 24 and September 2, 2026, Knox was euthanized while in the custody of Horses’ Haven. Because no one ever contacted Ms. Ptasznik to give her any information about this, it is unclear who ordered Knox to be euthanized, when he was euthanized, who euthanized him, where he was euthanized, and what became of his remains after they were sent to Michigan State University.

121. On September 2, 2026, a County spokesperson stated publicly that Knox had become ill, that a veterinarian determined he needed to be euthanized, and that his body was sent to Michigan State University for a necropsy.

122. Neither the County nor Horses’ Haven has told Plaintiffs what illness Knox had, when it began, what treatment was attempted, who made the decision, or who performed the euthanasia. Neither has produced the necropsy report. No records have been produced.

123. On information and belief, no one gave Ms. Ptasznik notice before Knox was euthanized, asked for her consent, or offered her the opportunity to have her own veterinarian examine him or to take him home. At that time, her motion for a hearing had been submitted to the 52nd District Court, 1st Division, and served on Oakland County Animal Control.

124. When an animal in a cruelty case dies or is euthanized, the County’s written policy requires notice to administration and the animal control officer. It also requires necropsy and histopathology as warranted, refrigeration rather than freezing of the body, and a forensic report

stating the cause, manner, contributory causes and mechanism of death and whether the death conformed to American Veterinary Medical Association euthanasia guidelines.

125. Plaintiffs demand that Defendants preserve and produce every record, photograph, examination, treatment note, communication, necropsy form and report concerning Knox, and preserve his remains.

L. The consequences for the business.

126. HCMA representatives attended the execution of the warrants. HCMA afterward revoked all of the business's commercial activity permits pending completion of the investigation.

127. Plaintiffs demanded reinstatement on September 4, 2026, after the Prosecutor's declination and the return of the horses. HCMA reinstated Plaintiffs' permits and access to Kensington Metropark on or about September 8, 2026.

128. Plaintiffs lost the use of their horses from August 12 to September 2, 2026, lost bookings and revenue during and after that period, lost Knox, incurred veterinary and recovery costs, and suffered injury to the business's reputation.

129. As a result of losing their horses for this period, Plaintiffs lost contracts with FanDuel, Barefoot and Free Festival, and Oakland County Parks and Recreation.

COUNT I
Fourth Amendment, 42 USC 1983: Judicial Deception
(Against Mausolf, Dvonch and Horses' Haven)

130. Plaintiffs restate every paragraph above as though fully written here.

131. The Fourth Amendment protects Plaintiffs against unreasonable searches and seizures. Horses are effects, and their removal was a seizure. *Soldal v Cook County*, 506 US 56; 113 S Ct 538; 121 L Ed 2d 450 (1992).

132. Officer Mausolf swore the affidavits on which the warrants issued.

133. At all relevant times, Officer Mausolf acted under color of state law and within the course of her employment with the County.

134. She knew from the County's own file of Officer Lee's July 16 visit. She referenced that visit in her July 30 report entry. She had made no request for veterinary records and had not examined any horse or spoken with the owner.

135. She swore that she was "unable to verify any veterinary records" without disclosing that she had not asked for any. She presented Ms. Dvonch as an independent expert without disclosing Ms. Dvonch's position with the organization that would take custody of the horses and stand to profit from their ultimate forfeiture. She also omitted the facts, described in Section F above, that the affidavits do not mention or disclose.

136. She made those statements and omissions knowingly and intentionally, or with reckless disregard for the truth. An officer who writes that she could not verify records she never requested, and who omits her own agency's finding that the same horses were in good shape, acts at least with reckless disregard.

137. The statements and omissions were material. A corrected affidavit would have disclosed that (a) the only County officer to document an examination of the horses had found them in good shape with access to hay, water and shelter 26 days earlier; (b) a licensed veterinarian had examined and scored every horse on July 30, the most recent date of any photograph the affidavit relied on; (c) the affiant had never asked for the records she said she could not verify; and (d) the expert who endorsed the affiant's conclusions had never seen the horses and led the organization that would take custody of them and stand to profit from their forfeiture.

138. The line on the 2685 West Commerce Road affidavit stating the date it was sworn was typed with the date August 4, 2026, the day Officer Reynolds told Mr. Skubik that the horses were going to be taken, and was changed by hand to August 11. The Wiles photographs on which

paragraphs Z through AC rely were uploaded to the County's case file that same morning, minutes after Officer Reynolds's call. On information and belief, the typed date shows that the affidavit was prepared by August 4, 2026, and that the decision to seize the herd had been made before the investigation on which the affidavits relied was complete.

139. Paragraph AE presented Ms. Dvonch's agreement as independent corroboration. It was not independent. Ms. Dvonch had never seen the horses, and her organization would house them, care for them at the County's expense, and receive them if they were forfeited. Horses' Haven also solicited donations on social media tied to its custody of the horses.

140. The affidavits relied on nine witnesses without saying when most of them last saw the herd. The affidavits describe Ms. DeRonne as an employee during the summer of 2025, but she was never employed by Plaintiffs and came to the farm only for two training rides in July 2025. Ms. McMaster's involvement ended in May 2026. Ms. Stawiarski last guided a ride in November 2025, and Ms. Rakay last worked at the business in June 2026. The most recent photograph was taken July 30, 2026, the day a licensed veterinarian scored every horse and found 35 of 37 within the normal range.

141. The records the affidavits said could not be verified were readily available. Dr. Lobar's and Dr. Epp's records named Plaintiffs as the client, and the barn identified both veterinarians by name. When the County asked for those records after the seizure, it had them within days: it contacted Dr. Epp on August 14 and 18, 2026, and placed Dr. Lobar's records in its file by August 21, 2026.

142. The magistrate issued both warrants on the affidavits as written. Each authorized the seizure of "any equine" at the property it described, and the County relied on them to remove all 37 of Plaintiffs' horses.

143. An affidavit that disclosed those facts would not have established probable cause to seize the herd. *Franks v Delaware*, 438 US 154; 98 S Ct 2674; 57 L Ed 2d 667 (1978); *Malley v Briggs*, 475 US 335; 106 S Ct 1092; 89 L Ed 2d 271 (1986).

144. Ms. Dvonch and Horses' Haven participated jointly with Officer Mausolf in obtaining the warrants and in executing the seizure. Ms. Dvonch reviewed the evidence and endorsed the affiant's conclusions for use in the affidavits, and then examined and took custody of the horses. They acted under color of state law. *Dennis v Sparks*, 449 US 24; 101 S Ct 183; 66 L Ed 2d 185 (1980).

145. Ms. Dvonch knew that her review would be presented to the magistrate in support of the warrants. She knew that she had never examined the horses and that Horses' Haven would take custody of any horse seized. She allowed her endorsement to be presented as independent expert corroboration without disclosing either fact.

146. Ms. Dvonch is the Executive Director of Horses' Haven and its final decision-maker on the intake and care of seized animals. Her decisions to endorse the affidavits and to take custody of the horses were the decisions of Horses' Haven and reflect its policy and practice of working with animal control agencies on seizures of animals it then takes into custody.

147. It was clearly established in August 2026 that an officer may not obtain a warrant through statements or omissions made knowingly or with reckless disregard for the truth. *Franks*, 438 US at 155-156. Officer Mausolf is not entitled to qualified immunity. Horses' Haven, a private organization with a financial stake in the seizure, and Ms. Dvonch, its Executive Director, are not entitled to qualified immunity. *Wyatt v Cole*, 504 US 158; 112 S Ct 1827; 118 L Ed 2d 504 (1992); *Richardson v McKnight*, 521 US 399; 117 S Ct 2100; 138 L Ed 2d 540 (1997).

148. Plaintiffs lost the use of 37 working horses for 21 days during the riding season. Their business could not operate, they lost contracts with business customers, their commercial activity permits at Kensington Metropark were revoked, and Knox did not come home.

149. As a direct and proximate result of the warrants procured through these statements and omissions, Plaintiffs suffered the damages described above. Defendants acted with reckless or

callous indifference to Plaintiffs' federally protected rights, and Plaintiffs are entitled to compensatory and punitive damages. *Smith v Wade*, 461 US 30; 103 S Ct 1625; 75 L Ed 2d 632 (1983).

COUNT II
Fourth Amendment, 42 USC 1983: Warrantless Entry
(Against Reynolds)

150. Plaintiffs restate every paragraph above as though fully written here.

151. Before August 4, 2026, Officer Reynolds entered the property where Plaintiffs' horses were kept, without a warrant and without consent. She said so herself.

152. At all relevant times, Officer Reynolds acted under color of state law. She entered the property as a County animal control officer to gather information for the County's investigation, and she later executed the warrant and photographed the properties in that same capacity.

153. On information and belief, Officer Reynolds entered both properties where Plaintiffs' horses were kept, 2685 West Commerce Road and 2471 Meadowood Lane. Each entry was a separate intrusion.

154. Officer Reynolds described the entry to Mr. Skubik on August 4, 2026, eight days before the warrants were executed. Mr. Skubik has sworn to it in the affidavit attached as Exhibit 3.

155. No warrant for either property existed until August 11, 2026. Neither Ms. Ptasznik nor Mr. George consented to any entry by Officer Reynolds.

156. Nothing in the County's report records Officer Reynolds's entry. She disclosed it in a personal telephone call, not in any County record, and then asked in writing that it be kept secret because it would cost her job. An officer who believed her entry was lawful would have had no reason to conceal it.

157. On information and belief, she entered areas in which Plaintiffs had a reasonable expectation of privacy. These include the curtilage of Ms. Ptasznik's residence at 2685 West

Commerce Road and the enclosed barns and run-ins Plaintiffs occupied at 2471 Meadowood Lane. She did so to gather information about the horses for the County's investigation.

158. The barn and immediate surroundings at 2685 West Commerce Road lie within the curtilage of Ms. Ptasznik's home.

159. The enclosed barns, office and tack room Plaintiffs use at 2471 Meadowood Lane are commercial premises not open to the public, in which Plaintiffs have a reasonable expectation of privacy. *See v City of Seattle*, 387 US 541; 87 S Ct 1737; 18 L Ed 2d 943 (1967).

160. No exigency existed. The County's own file already recorded the landowner's instruction that entry required contact first or a warrant.

161. Officer Reynolds was then assigned to execute the warrant at 2471 Meadowood Lane and to photograph both properties. On information and belief, what she observed during her unauthorized entry informed the County's investigation and its decision to seek warrants and seize the herd. Further, on information and belief, Officer Mausolf was present with Officer Reynolds.

162. It was clearly established that a warrantless physical entry onto the curtilage of a home to gather information is a search. *Florida v Jardines*, 569 US 1; 133 S Ct 1409; 185 L Ed 2d 495 (2013). Officer Reynolds is not entitled to qualified immunity.

163. The entry invaded Plaintiffs' privacy and possessory interests in their home, barns and enclosures. Plaintiffs are entitled to compensatory damages, or at minimum nominal damages, and to punitive damages for an entry Officer Reynolds knew was unauthorized and tried to conceal. *Smith v Wade*, 461 US 30; 103 S Ct 1625; 75 L Ed 2d 632 (1983).

COUNT III

Fourteenth Amendment, 42 USC 1983: Procedural Due Process (Against Mausolf, Horses' Haven, Dvonch and Does 1 through 10)

164. Plaintiffs restate every paragraph above as though fully written here.

165. Plaintiffs have a protected property interest in their horses.

166. Horses' Haven and Ms. Dvonch held the horses under the authority of the County's warrant and in joint action with County officers. They acted under color of state law. *Lugar v Edmondson Oil Co*, 457 US 922; 102 S Ct 2744; 73 L Ed 2d 482 (1982); *Dennis v Sparks*, 449 US 24; 101 S Ct 183; 66 L Ed 2d 185 (1980).

167. At all relevant times, Officer Mausolf acted under color of state law as the officer in charge of the seizure and of the County's custody of the horses. On information and belief, she and Does 1 through 10 authorized or approved the euthanasia of Knox, or were informed of it in advance and gave Plaintiffs no notice.

168. By August 20, 2026, Ms. Ptasznik had submitted a motion to the 52nd District Court requesting a hearing under MCL 750.50 and had served it on Oakland County Animal Control. The County and Horses' Haven knew that she owned Knox, that she was represented by counsel, and how to reach her.

169. On August 24, 2026, the County's own veterinary summary recorded that Knox "was sound on examination."

170. Between August 24 and September 2, 2026, Knox was euthanized. On information and belief, no one notified Ms. Ptasznik or her counsel beforehand, and no one offered her veterinarian an opportunity to examine him, offered to return him, or sought an order from the court to which her motion had been submitted.

171. On information and belief, Knox's illness was colic, and no emergency prevented a telephone call to Ms. Ptasznik or her counsel before Knox was euthanized. Plaintiffs' barn staff had managed colic in their own horses and could have been reached to do so again. On or about June 25, 2026, Amante had colic and was medically managed. On or about June 30, 2026, Lakota had colic and was medically managed.

172. Defendants destroyed Knox without notice to his owner and without any opportunity to be heard. They did so after the owner had asked the court for a hearing under MCL 750.50 and served that request on the County. Pre-deprivation process was available and was not given. *Mathews v Eldridge*, 424 US 319; 96 S Ct 893; 47 L Ed 2d 18 (1976).

173. The deprivation was not random or unauthorized. It resulted from the County's established arrangement placing seized animals with Horses' Haven and permitting custodial decisions, including euthanasia, without any procedure for notice to the owner. Because the deprivation was predictable and pre-deprivation notice was feasible, the availability of post-deprivation state remedies does not satisfy due process. *Zinerman v Burch*, 494 US 113; 110 S Ct 975; 108 L Ed 2d 100 (1990).

174. The County also conditioned the return of Plaintiffs' property on payment, within fourteen days and on penalty of forfeiture of a \$364,000 herd, of a demand of which 74 percent was a flat intake charge. That charge was fixed before any veterinary examination and bore no disclosed relation to the cost of care. Plaintiffs could not pay it and were forced to litigate to prevent forfeiture until the County dismissed the demand on September 1, 2026.

175. The demand was served on August 14, 2026. It gave Plaintiffs 14 days to pay \$63,478.60 or forfeit 37 horses. It was calculated by multiplying a preprinted per-animal intake charge by the number of horses, without regard to any horse's size, age, condition or actual needs, and before any veterinarian had completed an examination.

176. MCL 750.50 measures security by the cost of care for 30 days after examination by a licensed veterinarian. The County's form did not. The County never explained the intake charge, and Plaintiffs could obtain review of the amount only by filing their own motion.

177. The security demand was imposed under the County's official form and practice, and Plaintiffs assert that theory against the County in Count IV.

178. Plaintiffs were harmed, including by the permanent loss of Knox, the cost of contesting an unlawful demand, and the threat of forfeiture of the entire herd.

COUNT IV
Municipal Liability, 42 USC 1983
(Against the County of Oakland)

179. Plaintiffs restate every paragraph above as though fully written here.

180. A county is liable under 42 USC 1983 when its policy, custom or practice is the moving force behind a constitutional violation. *Monell v Dep't of Social Services*, 436 US 658; 98 S Ct 2018; 56 L Ed 2d 611 (1978). A single decision by an official with final policymaking authority is official policy. *Pembaur v Cincinnati*, 475 US 469; 106 S Ct 1292; 89 L Ed 2d 452 (1986). A failure to train that reflects deliberate indifference to the rights of the persons with whom officers come into contact is also actionable. *City of Canton v Harris*, 489 US 378; 109 S Ct 1197; 103 L Ed 2d 412 (1989).

181. The County's Animal Seizure Security Deposit/Bond Information form contains a preprinted line for an "Initial intake cost per animal." The County applied a flat charge of \$1,265.64 per horse on the day of seizure, before any veterinary examination, as the largest component of the demand. That form and charge are official policy.

182. The County applied the same \$1,265.64 charge to each of 37 horses of different sizes, ages and conditions. The figure reflects a preset formula, not an individualized judgment about any horse.

183. The County's security demand policy deprived Plaintiffs of due process, as alleged in Count III, by conditioning the return of their property, on penalty of forfeiture, on payment of an amount untethered to the cost of care and set before any veterinary examination.

184. The County has a custom or practice of placing seized large animals with a private rescue and relying on that rescue's executive director to evaluate their condition. Its written policies

do not address the conflict created when the evaluator's organization is paid for the animals' care and may receive them on forfeiture, including the ability to re-sell and re-home.

185. Horses' Haven publicly describes its strategy as developing supportive working relationships with animal control agencies and offering hands-on clinics for animal control officers. On information and belief, Horses' Haven has trained County animal control officers and has received animals seized by the County in prior cases.

186. The County failed to train and supervise its officers on the disclosures a warrant affidavit requires, on its own requirements that investigations be objective and that the owner or caretaker be interviewed, on confidentiality in cruelty cases, and on assigning officers with a personal connection to a matter.

187. The County's written policies require objective investigations, an on-scene interview of the owner or caretaker, collection of medical information from the owner in a multi-animal case, and restriction of case discussions to those immediately involved. In this case the officer in charge did not interview the owner or request any medical record before seeking warrants, and an officer assigned to the seizure discussed the case with a private citizen and asked him to conceal it.

188. These were not the acts of a single officer. The officer in charge, a second officer, the Animal Control supervisor and four other officers took part in the investigation and seizure. The supervisor served the Meadowood Lane warrant alongside Officer Reynolds.

189. The need for that training and supervision was obvious. The County was deliberately indifferent to it.

190. After the Prosecutor's Office declined charges, the County's Animal Control Division Manager, Bob Gatt, publicly defended the investigation. He stated that the County had enlisted the assistance of experienced equine professionals and that every decision was based on the evidence

available. The County thereby approved both the conduct described in this Complaint and the basis for it.

191. Mr. Gatt was also personally involved while the horses were held. On or about August 14, 2026, he declined an offer of each horse's diet and medical information and discussed only the security payment.

192. Those policies, customs and failures were the moving force behind, and directly caused, the violations alleged in Counts I through III and Plaintiffs' resulting damages.

COUNT V

Statutory Conversion, MCL 600.2919a

(Against Horses' Haven, Dvonch and Does 1 through 10)

193. Plaintiffs restate every paragraph above as though fully written here.

194. Plaintiffs owned the horses and were entitled to possess them.

195. Horses' Haven knew the horses belonged to Plaintiffs. The County's Notices of Animal Seizure named Ms. Ptasznik as the owner, and Ms. Ptasznik's August 20, 2026 motion asserted her ownership and demanded return of the horses.

196. Horses' Haven is a charity that depends on public contributions, which made up about 78 percent of its reported 2025 revenue. It operates a sponsorship program in which donors pay toward the care of individual horses.

197. Horses' Haven and Ms. Dvonch converted Plaintiffs' property to their own use by employing it for purposes personal to their own interests. *Aroma Wines & Equipment, Inc v Columbian Distribution Services, Inc*, 497 Mich 337; 871 NW2d 136 (2015). On information and belief, they used Plaintiffs' horses to solicit donations for Horses' Haven. They also destroyed Knox.

198. Horses' Haven publicized its custody of Plaintiffs' horses and solicited donations tied to them. It used Plaintiffs' property to raise money for itself.

199. Horses' Haven and Ms. Dvonch also exercised dominion over Knox by euthanizing him without the owner's authorization, and then refused to tell her what had happened, directing her to the County instead.

200. MCL 600.2919a entitles Plaintiffs to three times their actual damages, together with costs and reasonable attorney fees.

201. Plaintiffs' actual damages include the value of Knox, carried at \$7,500; the amounts Horses' Haven raised using Plaintiffs' horses; the cost of evaluating and treating Onyx and the other returned horses; and, to the extent attributable to the conversion, the loss of use of the horses, including lost contracts.

COUNT VI

Common Law Conversion

(Against Horses' Haven, Dvonch and Does 1 through 10)

202. Plaintiffs restate every paragraph above as though fully written here.

203. Defendants exercised dominion over Plaintiffs' horses in a manner inconsistent with Plaintiffs' ownership. They destroyed Knox without the owner's knowledge or consent and without lawful authority to do so.

204. Horses' Haven's custody was limited to holding the horses pending the outcome of the County's investigation and any proceeding under MCL 750.50. Neither Plaintiffs nor any court authorized it to destroy any of them.

205. When Ms. Ptasznik asked about Knox, Horses' Haven refused to tell her and directed her to the County. Defendants have not returned his remains, his records, or the necropsy report.

206. Defendants also returned Onyx in materially worse condition than when he was taken. He was lame, both hind legs were severely stocked up, and he had been kept in a stall with manure packed beneath the mats and in a halter too small for his head.

207. Plaintiffs are entitled to the value of Knox and to damages for the injury to their other horses.

COUNT VII
Negligence, Breach of Bailment and Gross Negligence
(Against Horses' Haven, Dvonch and Does 1 through 10)

208. Plaintiffs restate every paragraph above as though fully written here.

209. Plaintiffs plead negligence, breach of bailment and gross negligence in the alternative.

210. Having taken custody of Plaintiffs' horses, Horses' Haven and Ms. Dvonch owed Plaintiffs a duty of reasonable care in housing, feeding, treating and returning them.

211. Horses' Haven's possession of the horses created a bailment. It lawfully acquired possession of Plaintiffs' property for a limited purpose, with the obligation to care for the horses and to return them when the County's hold ended. On information and belief, Horses' Haven was paid for the horses' care, making the bailment one for mutual benefit.

212. Horses' Haven took custody of 37 working horses with individual feed rations, medications and work restrictions. Those instructions were posted on the barn's whiteboard, which the County photographed on August 12, 2026. Neither Horses' Haven nor the County ever asked Ms. Ptasznik or her barn manager what any horse ate, which horses were on medication, or which horses were restricted.

213. They breached that duty. Knox entered their custody sound at a walk with a body condition score of five of nine and did not leave it alive. Onyx left their custody lame and severely stocked up, from a poorly kept stall with manure packed under the mats, causing the mats to rise off the ground.

214. Horses' Haven failed to return Knox and has never explained how he became ill or why he was euthanized.

215. Onyx was listed “OFF” work before the seizure. Horses’ Haven kept him in a stall where manure was packed so deeply under the mats that there was no level surface to stand on. It returned him with both hind legs so swollen that his tendons could not be seen.

216. On information and belief, Knox developed colic while in Horses’ Haven’s custody, and his illness was not reported to his owner in time for her or her veterinarian to intervene. On information and belief, the abrupt change in environment and diet, without the horses’ established feeding and medication information, contributed to Knox’s illness. That information was available. On or about August 14, 2026, Ms. Ptasznik’s attorney twice offered it to Oakland County Animal Control, and the offer was refused.

217. To the extent any Doe Defendant is a County employee, that Defendant’s conduct was so reckless as to demonstrate a substantial lack of concern for whether an injury would result, and was the proximate cause of Plaintiffs’ injury. MCL 691.1407(2)(c).

218. County officers placed the horses with Horses’ Haven and left them there for 21 days. On information and belief, no County officer notified Ms. Ptasznik or her counsel when Knox became ill or before he was euthanized.

219. Plaintiffs were harmed. They lost Knox and incurred veterinary and recovery costs for Onyx and the other returned horses.

COUNT VIII
Trespass
(Against Reynolds)

220. Plaintiffs restate every paragraph above as though fully written here.

221. Ms. Ptasznik owns and possesses 2685 West Commerce Road. At 2471 Meadowood Lane, Plaintiffs possess the barns, run-ins and enclosed pastures in which their horses are kept and, on information and belief, have the right to exclusive possession of the office and tack room they maintain there.

222. The 2685 West Commerce Road property includes Ms. Ptasznik's home, attached garage, detached shed, barn and pastures.

223. Officer Reynolds admitted that she entered the property where Plaintiffs' horses were kept without permission. On information and belief, she entered both properties.

224. On information and belief, Officer Reynolds entered 2685 West Commerce Road, including the barn, the pastures and the area immediately surrounding Ms. Ptasznik's home, intentionally, without Ms. Ptasznik's permission and without lawful authority.

225. On information and belief, Officer Reynolds separately entered 2471 Meadowood Lane, including the barns, run-ins, dry lots and enclosed pastures Plaintiffs occupy there, intentionally, without the permission of Plaintiffs or Mr. George and without lawful authority.

226. On information and belief, Officer Mausolf accompanied Officer Reynolds on one or both of these entries.

227. No warrant for either property existed until August 11, 2026. Neither Ms. Ptasznik nor Mr. George consented to Officer Reynolds's entry. Nothing in the County's report records the entry or any investigative purpose for it.

228. She did not act in good faith, and she did not act within the scope of her authority. She disclosed the entry to a private citizen and then asked him to conceal it because it would cost her job. She is not entitled to governmental immunity. *Odom v Wayne County*, 482 Mich 459; 760 NW2d 217 (2008).

229. A trespass to land is actionable without proof of actual damage. *Adams v Cleveland-Cliffs Iron Co*, 237 Mich App 51, 67; 602 NW2d 215 (1999).

230. Plaintiffs are entitled to compensatory damages, or at minimum nominal damages, and to exemplary damages for an intentional entry that Officer Reynolds concealed.

RELIEF REQUESTED

Plaintiffs ask this Court to enter judgment in their favor and against Defendants, jointly and severally as the law allows, and to award:

- A. Compensatory damages in an amount the jury determines. These include the value of Knox, the diminished value of and veterinary costs for any other horse, the loss of use of the herd from August 12 to September 2, 2026, lost profits and business interruption, and injury to Plaintiffs' business and reputation.
- B. Nominal damages on Counts II and VIII, to the extent compensatory damages are not proven.
- C. Three times Plaintiffs' actual damages under MCL 600.2919a, together with costs and reasonable attorney fees.
- D. Exemplary damages under Michigan law against Defendants Reynolds, Dvonch and Horses' Haven, and punitive damages under 42 USC 1983 against Defendants Mausolf, Reynolds, Dvonch and Horses' Haven.
- E. Attorney fees and costs under 42 USC 1988.
- F. An order requiring Defendants to preserve and produce all records, photographs, examinations, treatment notes, communications, necropsy forms and reports concerning Knox, and to preserve his remains.
- G. Pre-judgment and post-judgment interest under MCL 600.6013, costs, and any other relief this Court finds just.

Respectfully submitted,

FLOOD LAW, PLLC

/s/ Todd F. Flood

Todd F. Flood (P58555)

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Dated: September 30, 2026

**STATE OF MICHIGAN
SIXTH CIRCUIT COURT
COUNTY OF OAKLAND**

LUCILLE PTASZNIK, individually,
and HIGH VIBE TRAIL RIDES, LLC,
a Michigan limited liability company,

2026-226366-CZ
JUDGE Nanci J. GRANT

Plaintiffs,

v

Case No. 2026-
Hon.

COUNTY OF OAKLAND,
MORGANN MARIE REYNOLDS, individually,
AUBRIE MAUSOLF, individually,
HORSES' HAVEN, a Michigan nonprofit corporation,
KRISTINE DVONCH, individually, and
JOHN AND JANE DOES 1 through 10,

Defendants.

FLOOD LAW, PLLC
Todd F. Flood (P58555)
David M. Champine (P78216)
Attorneys for Plaintiffs
155 W Congress Street, Suite 350
Detroit, Michigan 48226
T: (248) 547-1032
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tflood@floodlaw.com
dchampine@floodlaw.com

This case has been designated as an
eFiling case, for more information
please visit www.oakgov.com/efiling.

DEMAND FOR TRIAL BY JURY

Plaintiffs demand a trial by jury on all issues so triable. MCR 2.508.

Respectfully submitted,

FLOOD LAW, PLLC

/s/ Todd F. Flood _____
Todd F. Flood (P58555)
Attorneys for Plaintiffs
155 W Congress Street, Suite 350
Detroit, Michigan 48226

(248) 547-1032
tflood@floodlaw.com

Dated: September 30, 2026

EXHIBIT 1



OAKLAND COUNTY ANIMAL CONTROL

1200 N. TELEGRAPH BLDG. 42E
PONTIAC MI 48341
248-858-1070



Case Report

Administrative Details:

CR No 260002932	Subject
Report Date/Time 07/16/2026 16:18	Occurrence Date/Time 07/16/2026 16:18
Location MEADOWOOD	Call Source PHONE
Dispatched Offense L3501 Animal - Welfare Check - A1	Verified Offense L3501 Animal - Welfare Check - A1
County 63 - Oakland	City/Twp/Village 52 - Milford
Division Patrol	

Action Requested:

- | | |
|--|--------------------------------------|
| ☐ Arrest warrant | ☐ Review only |
| ☐ Search warrant | ☐ Forfeiture |
| ☐ Juvenile petition | ☐ Other |

People:

UNKNOWN, LUCY (O-OTHER) (O-OWNER) [A1LEEJ (4445)]

PE:	W.Type:	Last Name Unknown	First Name Lucy	Middle Name	Suffix	Mr/Mrs/Ms
DOB (Age)	Sex F	Race UNKNOWN	Ethnicity Unknown	Birth City & State	Birth Country	Country of Citizenship
Street Address Unknown	Apt #	County Unknown	Country USA	Home Phone	Work Phone	
City Unknown	State	Zip	Cell Phone	Email		

GEORGE, RICHARD (O-OTHER) (O-OWNER) [A1LEEJ (4445)]

PE:	W.Type:	Last Name George	First Name Richard	Middle Name	Suffix	Mr/Mrs/Ms
DOB (Age)	Sex M	Race UNKNOWN	Ethnicity	Birth City & State	Birth Country	Country of Citizenship
Street Address MEADOWOOD LN	Apt #	County Oakland	Country USA	Home Phone UNKNOWN	Work Phone	
City Milford Twp	State MI	Zip 48380	Cell Phone	Email		

Narrative:

CFS Narrative By: A1LEEJ (4445)



OSPURSELLJ - 16:18:13 - CALLER STS THAT THE OWNER LUCILLE PTASZNIK IS STILL TAKING THE HORSES OUT FOR HOURS IN THE DANGEROUS WEATHER CONDITIONS// SHE IS NOT GIVING THEM ACCESS TO FOOD OR WATER

A1LEEJ - 17:48:00 - THE HORSES ON THE PROPERTY WERE IN GOOD SHAPE AND HAD ACCESS TO HAY, WATER AND SHELTER WHEN I ARRIVED THERE WERE HORSES TIED OUT FOR AN UPCOMING RIDE THAT WERE BEING FEED AND WATERED. IN THE FUTURE THE PROPERTY OWNER RICHARD GEORGE [REDACTED] WOULD LIKE TO BE CONTACTED FIRST UNLESS A WARRANT IS PRESENTED TO ENTER ONTO THE PREMISES.

EVIDENCE LIST

Incident No.: 260002932

Agency: Oakland County Animal Control

ITEM	NEEDED	IN-FILE	COMMENTS
Audio/Video Tape and Transcripts	()	()	
Autopsy Report	()	()	
BAC/Blood/Semen	()	()	
Ballistics/Bullets	()	()	
Chain of Evidence List	()	()	
Clothing/Shoes	()	()	
Confession (written, audio, video	()	()	
Controlled Substance (Tox Report)	()	()	
Criminal History	()	()	
CSC Kit	()	()	
Diagram Map	()	()	
Finger/Foot Prints	()	()	
Hair/Fiber	()	()	
Hospital/Medical Records	()	()	
Photographs/Slides	()	()	
Weapons	()	()	
Witness Statements	()	()	
CERTIFIED RECORDS	()	()	
SOS	()	()	
Convictions	()	()	
	()	()	
	()	()	
	()	()	
OTHER PHYSICAL EVIDENCE	()	()	
VICTIM PROPERTY			
	()	()	
	()	()	
	()	()	

Officer In Charge

Date

Phone No.

The Prosecuting Attorney's Office certifies that (*) property belonging to the crime victim must be retained by the Law Enforcement Agency for trial purposes in lieu of photograph or other means of memorialization pursuant to 1985 PA 87

Assistant Prosecutor

Date

EXHIBIT 2



BASIC SOAP (JUL 30, 2026)

Patient Information

Name:	High Vibe Farm Account
Breed (Species):	Quarter Horse (Equine)
Age (Birthday):	10 years 1 month 3 weeks (Jun 25, 2016)
Sex:	Gelding
Color:	
Chip:	
Weight:	

Owner Information

<u>Name</u>	<u>Address</u>	<u>Mobile</u>	<u>Home</u>	<u>Email</u>
High Vibe Trail Rides High Vibe Trail Rides		810-834-1864		thatladyemily@gmail.com

Visit Information

Visit Date:	Jul 30, 2026
Complaint:	Strangles testing
Provider:	Hillary Lobar

Subjective

Notes: Herd evaluated for body condition score and overall well-being. Individual horses, including Rolex and Fresca, were seen for ocular concerns. See attached sheet for horses evaluated and individual comments.

Assessment

Notes: 1. A total of 39 horses were seen today for body conditions scoring. The scores along with the template that was used for the scoring are attached. No horses demonstrated nasal discharge, swollen lymph nodes, coughing, or other signs of respiratory/communicable illness at the time of the exam. There is a history of a strangles outbreak on this farm last year; there is no evidence that there are any current clinical cases. We discussed that horses can become chronic, asymptomatic shedders of strangles. These individuals can appear clinically normal and can be very difficult to identify, short of repeated testing or testing via endoscopy of all individuals on the farm. For now, 5 horses were selected for testing, one from each field on the main farm. In the absence of extensive testing, it is impossible to say with certainty that there are no chronic shedders, but I can affirm that there were no visible clinical signs in any horse on the day of the visit.

2. RECOMMENDATION: Write standardized SOPs for current feeding practices, quarantine, checking for wounds, etc. It would be helpful to have written SOPs for staff training and for record keeping, especially regarding feeding and other daily care needs. Having these written and initialed helps to ensure that there is adequate documentation if questions of care arise in the future.

3. RECOMMENDATION: Develop a quarantine protocol for when new horses are introduced to the farm. Most communicable

diseases among horses have an incubation period of 14 days or less. In general, a two-week quarantine period is adequate to decrease the risk of transmission for the majority of communicable equine diseases. You can select one pasture to be a quarantine pen. This pen can be marked as such to ensure that staff and guests do not interact with the horses on quarantine unnecessarily. Horses that are in quarantine should be fed and handled last. Ideally, there would be separate equipment for feeding and cleaning to reduce the risk of cross-contamination across the facility. Additionally, taking the temperature of horses in quarantine once daily will help with disease detection, most communicable diseases present with a fever first before other signs are noted. A fever in a horse is any temperature over 101.5.

4. RECOMMENDATION: Currently, a Nutrena All Stages feed with a 14% protein content is being fed on the farm, as well as free choice hay in round bales. This should be adequate to meet the needs of most of the horses in the program. We discussed that some horses are lacking topline musculature. This may be due to the types of breeds that they are, driving breeds such as Dutch harness horses and draft crosses, as well as the level of work that they are in (mostly walking without having to come into a frame or use their core). Supplementing with vitamin E may help address any nutritional reasons for decreased topline musculature. Vitamin E is essential for muscle health and is highest in fresh green grass. Vitamin E supplementation, especially for horses with thin toplines, may help them develop this musculature. Vitamin E deficiency is frequently seen in the winter and in early spring when horses have had prolonged lack of access to fresh green grass. It can also occur at any time of year, especially if the grass has died back due to drought conditions and grazing.

5. RECOMMENDATION: Replace broken hay feeders. In the meantime, sharp edges/ends of the hay feeders can be protected by putting tennis balls on the end to decrease their risk of injury until they can be replaced.

Medical Records

JUL 30, 2026

 1 Unit(s) of Farm Call (11-20 miles).

 1 Unit(s) of Extended Physical Exam.

HENNEKE BODY CONDITION SCORE SHEET

DATE: _____

NAME: _____

ANIMAL ID: _____

DESCRIPTION: _____

☐ VISUAL or ☐ HANDS-ON ASSESSMENT

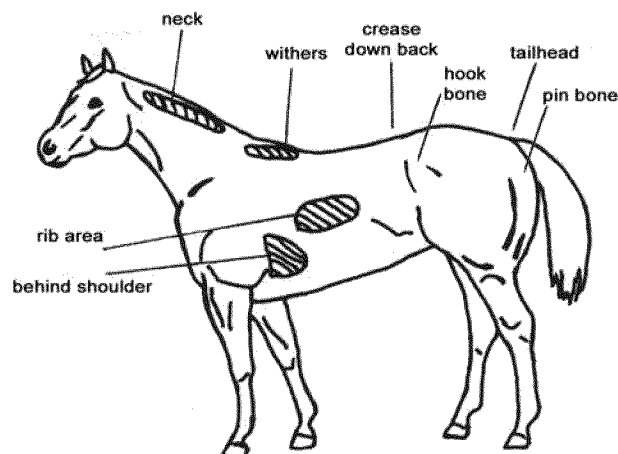
COMMENTS: _____

OVERALL BODY CONDITION SCORE: _____ ÷ 6 = _____

sum total

overall score

(circle descriptions for each area of the body then average together)



modified from Henneke et al. EVJ 1983;15:371-372

Condition	Neck	Withers	Shoulder	Ribs	Back	Tailhead Area
1 Poor (<i>extremely emaciated</i>)	Bone structure easily noticeable	Bone structure easily noticeable	Bone structure easily noticeable	Ribs projecting prominently	Spinous processes projecting prominently	Tailhead, pinbones, and hook bones projecting prominently
No fatty tissue can be felt						
2 Very Thin (<i>emaciated</i>)	Bone structure faintly discernible	Bone structure faintly discernible	Bone structure faintly discernible	Ribs prominent	Slight fat covering over base of spinous processes. Transverse processes of lumbar vertebrae feel rounded. Spinous processes are prominent	Tailhead prominent Pin bones prominent Hook bones prominent
3 Thin	Neck accentuated	Withers accentuated	Shoulder accentuated	Slight fat cover over ribs. Ribs easily discernible	Fat buildup halfway on spinous processes, but easily discernible. Traverse processes cannot be felt	Tailhead prominent but individual vertebrae cannot be visually identified. Hook bones appear rounded, but are still easily discernible. Pin bones not distinguishable
4 Moderately Thin	Neck not obviously thin	Withers not obviously thin	Shoulder not obviously thin	Faint outline of ribs discernible	Negative crease (peaked appearance) along back	Prominence depends on conformation. Fat can be felt. Hook bones not discernible
5 Moderate	Neck blends smoothly into body	Withers rounded over spinous processes	Shoulder blends smoothly into body	Ribs cannot be visually distinguished, but can be easily felt	Back is level	Fat around tailhead beginning to feel spongy
6 Moderately Fleshy	Fat beginning to be deposited	Fat beginning to be deposited	Fat beginning to be deposited behind shoulder	Fat over ribs feels spongy	May have a slight positive crease (a groove) down back	Fat around tailhead feels soft
7 Fleshy	Fat deposited along neck	Fat deposited along withers	Fat deposited behind shoulder	Individual ribs can be felt, but noticeable fat filling between ribs	May have a positive crease down the back	Fat around tailhead is soft
8 Fat	Noticeable thickening of neck	Area along withers filled with fat	Area behind shoulder filled with fat	Difficult to feel ribs	Positive crease down back	Fat around tailhead very soft
9 Extremely Fat	Bulging fat	Bulging fat	Bulging fat	Patchy fat appearing over ribs	Obvious crease down back Flank filled with fat	Bulging fat around tailhead (prepared by A Kane USDA APHIS 11/21/17)

High Vibe Trail Rides 7.30.2026

Name	Signalment	BCS	Additional notes
Armani	14 years Friesian x Morgan Gelding Bay	5.5/9	Nasal swab collected for PCR for strangles testing No clinical signs of strangles Coat appears healthy
Nacho	16 years QH x Belgian Gelding Blonde	5/9	Nasal swab collected for PCR for strangles testing No clinical signs of strangles Lacking topline musculature → Consider supplementing with Vit E Scar on the LF pastern Rub on the right side girth area → recommend no work until healed
Whiskey	3 years Missouri Fox Trotter Mare Chestnut tobiano	5/9	Privately owned horse Nasal swab collected for PCR for strangles testing No clinical signs of strangles UTD vax/Coggins
Chanelle	14 years Paint Mare	7/9	Nasal swab collected for PCR for strangles testing No clinical signs of strangles Small rub on right side of lip at commissure (near bit area)
Vogue	15 years Dutch Harness Horse Mare Bay	5/9	Nasal swab collected for PCR for strangles testing No clinical signs of strangles Windpuffs/suspensory branch welling both hind limbs, not sensitive to palpation Scar on RF pastern Sound at a walk on firm ground
Java	7 years Missouri Fox Trotter Mare Bay	5/9	No clinical signs of strangles
Enzo	4 years QH Gelding Gray	4.5/9	Privately owned horse No clinical signs of strangles Lacking muscle over topline, abnormal topline development esp in lumbar spine Recently turned out after 6 months of stall rest for suspensory injury. Visible drop in fetlock on right hind

Legend	13 years Paint Gelding Black tobiano	6/9	No clinical signs of strangles
Flash	18 years QH Gelding Chestnut	5/9	No clinical signs of strangles
Raya	15 years QH Mare Bay	5/9	No clinical signs of strangles Small umbilical hernia Dried sweat marks→recommend review post ride grooming protocols
Moose	15 years Dutch Harness Horse Gelding Bay	4/9	No clinical signs of strangles Lacking topline→recommend supplementing vitamin E LP reports concerned about difficulty gaining and maintaining weight
Paloma	20 years Belgian Mare Blonde/roan	4/9	No clinical signs of strangles Wound RH coronary band on the inside, has proud flesh. Wound caused by interference with LH. Currently treating for proud flesh, not in work Recommend→brushing boots when back in work
Fiona	19 years Rocky Mountain Mare Champagne	6/9	Privately owned horse No clinical signs of strangles UTD vax/Coggins/teeth
Luna	16 years Draft/WB x Mare Bay	5/9	No clinical signs of strangles
Memphis	8 years QH Mare Buckskin	5/9	No clinical signs of strangles
Prada	6 years Paint pony (gaited) Mare Black tobiano	5/9	No clinical signs of strangles Coat very healthy

Fresca	20 years Belgian Mare Blonde/roan	3.5/9	No clinical signs of strangles See other notes regarding eye condition Lacking topline, recommend no work until weight gain occurs
Dior	5 years Dutch Harness Horse Mare Black/dark bay	4.5/9	No clinical signs of strangles
Onyx	16 years TWH Gelding Bay	5/9	No clinical signs of strangles
Rolex	20 years Friesian x Haflinger Gelding Black	5/9	No clinical signs of strangles See other notes about recent eye condition
Burberry	18 years Percheron x Gelding Black/dark bay	5/9	No clinical signs of strangles Scars from harness over shoulders, rub near where rider's leg would be but appears healed/scarred
Rita	15 years Paso Fino Mare Bay	4.5/9	No clinical signs of strangles See other notes regarding recent lameness LP reports had been fat but then had diet change and lost weight too quickly
Ember	14 years Draft cross Mare Chestnut	4.5/9	No clinical signs of strangles Fecal egg count = 0 Rub on withers occurred within last week (was not there last week when I collected the fecal)→rec no work until healed
Atlas	15 years Friesian x Morgan Gelding Black	5/9	No clinical signs of strangles Pulled shoe, lost a significant amount of hoof wall right front. Girth rubs on both sides
Bingo	8 years Pony Gelding Bay	4.5/9	No clinical signs of strangles See other notes about recent lameness
Gaston	15 years Draft cross Gelding Bay	4/9	No clinical signs of strangles Fecal egg count = 400 eggs per gram Dewormed with Equimax

Poppy	12 years Haflinger Mare Blonde	5/9	No clinical signs of strangles Redundant skin in girth area with healing girth rubs
Prince	7 years Percheron x Andalusian Gelding Gray	6/9	No clinical signs of strangles Hunter's bump v. healed granuloma from saddle sore, present for months, non- painful
Amara	14 years Draft cross Mare Bay	5/9	No clinical signs of strangles Slight forelimb lameness at a trot
Godiva	14 years Clyde x Vanner Mare Bay	5/9	No clinical signs of strangles Thickened tendon region LF and RF, suspensory branches v. tendon sheath Sound at a walk
Bonny	16 years QH Mare Bay	6/9	No clinical signs of strangles
Cash	12 years QH pony Gelding Buckskin	5/9	No clinical signs of strangles Girth rubs Rougher coat than others Prominent tail head, otherwise not thin
Louie	11 years Arabian Gelding Chestnut	5/9	No clinical signs of strangles Bot eggs! Comb off and deworm with Equimax
Putt Putt	8 years Paint Gelding Black tobiano	5/9	No clinical signs of strangles Redundant skin at girth Fly strike LF
Knox	14 years TWH Gelding Black	5/9	No clinical signs of strangles Windpuffs LH Sound at a walk
April	20 years Standardbred Mare Bay	5.5/9	No clinical signs of strangles Fresh rub on withers, white hairs present since purchase

Thor	17 years Clyde x QH Gelding Bay	6/9	No clinical signs of strangles Bump at end of saddle area
Rumor	18 years Draft cross Mare Chestnut tobiano	5/9	No clinical signs of strangles See recent clinical notes
Treasure	15 years Draft cross Mare Bay	5/9	No clinical signs of strangles Bump at end of the saddle area Sway back Windpuffs both hind
Amante	17 years QH Gelding Gray	6/9	No clinical signs of strangles Coat somewhat shaggy Recommend testing for PPID (Cushings)

EXHIBIT 3

AFFIDAVIT OF BENJAMIN SKUBIK

STATE OF MICHIGAN
COUNTY OF OAKLAND) ss.

BENJAMIN SKUBIK swears and states the following:

1. I am over the age of 18 years, I am competent to testify to the matters set forth in this Affidavit, and I make this Affidavit based on my own personal knowledge. If called as a witness, I could and would testify competently to each of the statements below.

2. I reside in the Village of Holly, County of Oakland, State of Michigan.

3. I know Morgann Marie Reynolds personally. Ms. Reynolds and I were in a dating relationship that lasted approximately four years and ended in 2026.

4. During the course of that four-year relationship, I spoke with Ms. Reynolds by telephone and exchanged text messages with her regularly. I am familiar with the sound of her voice, and I am familiar with the cellular telephone number she uses, which is (248) 807-5634. That number is saved in the contacts on my personal cellular telephone under her name.

5. I understood Ms. Reynolds to be employed by Oakland County Animal Control at all times relevant to the statements in this Affidavit.

6. On August 4, 2026, at approximately 9:04 AM, I received a telephone call from Ms. Reynolds at the number identified in Paragraph 4. I recognized her voice, and she identified herself. That call lasted approximately 18 minutes.

7. During that call, Ms. Reynolds told me that she had previously entered onto the property where the horses belonging to High Vibe Trail Rides were kept, without permission.

8. Also during that same call, Ms. Reynolds told me that “they were going to take the horses from Lucie.” I understood the name “Lucie” to refer to Lucille Ptasznik, the owner of High Vibe Trail Rides. I understood “they” to refer to Oakland County Animal Control.

9. At the time Ms. Reynolds made these statements to me on August 4, 2026, the horses had not yet been seized.

10. Following that telephone call, I received a text message from Ms. Reynolds on my personal cellular telephone. In that message, Ms. Reynolds asked me not to disclose what she had told me and stated that she would lose her job if I did.

11. I have not been promised anything, paid anything, or offered anything of value in exchange for this Affidavit. No one has threatened or coerced me to provide it. I am providing this Affidavit voluntarily.

12. Further, Affiant sayeth not.

Benjamin Skubik

ID: g2Rvi9QySR54KUkwL586rsb6

BENJAMIN SKUBIK 8/28/2026

eSignature Details

Signer ID:	q2Rvi9QySR54KUkwL586rsb6
Signed by:	Benjamin Skubik
Sent to email:	benjamin.skubik1@gmail.com
IP Address:	107.116.98.52
Signed at:	Aug 28 2026, 11:16 am EDT

EXHIBIT 4

ORIGINAL

RECEIVED FOR FILING

AUG 11 2026

52-1 DISTRICT COURT

SEARCH WARRANT

STATE OF MICHIGAN)
) SS
COUNTY OF OAKLAND)

TO THE SHERIFF OR ANY OFFICER OF SAID COUNTY:

THE ATTACHED AFFIDAVIT having been sworn to by the Affiant, Officer Aubrie Mausolf, before me this day, based upon the facts stated therein, probable cause having been found; in the name of the People of the State of Michigan I command that you enter the following described place:

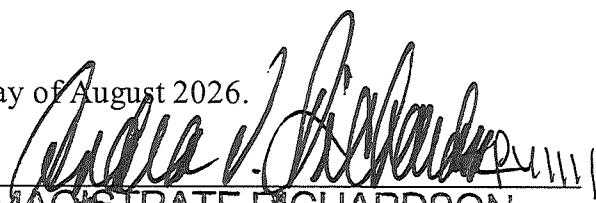
All barns, sheds, run-ins, lean-tos, trailers, the home, garage, any attached and unattached structures, and pastures located at [REDACTED] in the Township of Milford, County of Oakland, and the State of Michigan. [REDACTED] is a single-story, single family, brown siding, home and attached garage. The dwelling has a brown detached shed on the left side of the dwelling. The Parcel ID Number (PIN) for this property is [REDACTED]. The property is located on the west side of [REDACTED] and off [REDACTED] (paved road).

therein to search for, seize, secure, tabulate and make return according to law the following property and things:

Any and all evidence of animal cruelty and violations regarding MCL 287.744, and MCL 750.50, including but not limited to any equine, including but not limited to an animals; veterinary records; feeding schedules, receipts for equine food and medical care; documents showing domain and control, indicia of residency and/or occupancy of the premises described, including but not limited to correspondence, bills, envelopes and keys.

IT IS FURTHERED ORDERED that Oakland County Animal Control may photograph the interior and exterior of any barns, sheds, run-ins, lean-tos, trailers, the home, garage, any attached and unattached structures, and pastures at [REDACTED] in the Township of Milford.

ISSUED UNDER MY HAND this 11th day of August 2026.


MAGISTRATE RICHARDSON

Judge in and for the
52-1 District Court,
Oakland County, State of Michigan.

RECEIVED FOR FILING

AUG 11 2026

52-1 DISTRICT COURT

AFFIDAVIT FOR SEARCH WARRANT

STATE OF MICHIGAN)
) SS
COUNTY OF OAKLAND)

Officer Aubrie Mausolf, Affiant, being first duly sworn, on oath deposes and says:

(1) That the following property constitutes evidence of criminal conduct:

Any and all evidence of animal cruelty and violations regarding MCL 287.709, 287.111, 287.112, 287.115, 287.717c, 287.744, and MCL 750.50, including but not limited to any equine, including but not limited to an animals; veterinary records; feeding schedules, receipts for equine food and medical care; documents showing domain and control, indicia of residency and/or occupancy of the premises described, including but not limited to correspondence, bills, envelopes and keys.

(2) Affiant further says that the above-mentioned property is located at the following described place:

All barns, sheds, run-ins, lean-tos, trailers, the home, garage, any attached and unattached structures, and pastures located at [REDACTED] in the Township of Milford, County of Oakland, and the State of Michigan. [REDACTED] is a single-story, single family, brown siding, home and attached garage. The dwelling has a brown detached shed on the left side of the dwelling. The Parcel ID Number (PIN) for this property is [REDACTED]. The property is located on the west side of [REDACTED] and off [REDACTED] (paved road).

(3) Affiant further says that she has probable cause to believe the above listed property to be searched for and seized is now located upon said described premises, based upon the following facts:

- A. Affiant is an officer with the Oakland County Animal Shelter and Pet Adoption Center and a Deputy with the Oakland County Sheriff's Office, and she has been employed as a law enforcement officer for two years.
- B. Affiant is the officer in charge of an investigation involving the neglect of animals following multiple complaints.
- C. That during the course of the investigation, Affiant was able to determine the owner of the horses as Lucille Ptasznik.

- D. That Affiant determined that Lucille Ptasznik owns High Vibe Trail Rides.
- E. That Affiant was able to determine High Vibe Trail Rides as a Trail riding business that also offers horse riding lessons.
- F. That Affiant determined the horses are used in the trail/lesson riding business.
- G. That Affiant received complaints about how these horses were obtained, example: regarding proper documentation when horses are transported or change of ownership. MCL 287.717c "An equid that changes ownership in this state or that is moved into this state from another state must have an official equine infectious anemia test with a negative result within the previous 12 months. An equid moved into this state from another state must meet the requirements of section 19. (5) an equine infectious anemia laboratory test form shall contain, at a minimum, the color, breed, sex, age, markings, name of owner, and location or address of the equid to which it applies. A photographic or graphic likeness may also be used to demonstrate the color and markings of the equid. An official equine infectious anemia test with a negative result, can also be called a negative Coggins test.
- H. That Affiant determined that Lucille Ptasznik receives horses from auction or slaughter from an unknown supplier every month.
- I. That Affiant determined that the newly obtained horses are added directly with the horses actively working for High Vibe Trail Rides or are sold to others.
- J. That Affiant is unable to verify any veterinary records at this time.
- K. That Affiant determined that High Vibe Trail Rides operates at [REDACTED]
[REDACTED]
- L. That Affiant determined that Lucille Ptasznik keeps horses at both properties: [REDACTED] and [REDACTED]
- M. That Affiant interviewed Montana Kay Rakay, who indicated the following:

1. That she was an employee of High Vibe Trail Rides at [REDACTED] during June and July 2026.
2. That she observed underweight horses.
3. That she observed horses with sickness/injury not receiving veterinary care.
4. That she photographed underweight horses with overgrown/cracked feet, which shows inadequate hoof care. Photos attached from July 19, 2026 and July 26, 2026.
5. That she also observed unsafe conditions/pastures for the horses; ex: mostly mud manure instead of dirt/grass and broken hay feeders in the pastures.
6. That she observed sickly animals being bought and sold without seeing a veterinarian, without proper paperwork as per state law. Negative Coggins test must be recorded for change of ownership or transport.
7. That she observed horses fighting over small amounts of hay, as there was rarely enough hay for all horses.

N. That Affiant reviewed the photographs for authenticity. Affiant was able to view underweight horses overgrown/unkept hooves, which shows inadequate hoof care in the pictures.

O. That Affiant interviewed Brenda Brierly, who indicated the following:

1. That she was an employee of High Vibe Trail Rides from 2021 through 07/17/2026.
2. That she observed underweight horses.
3. That she observed horses with sickness/injury not receive veterinary care, per state law.
4. That she observed unsafe/unkept pastures; ex: mostly mud manure instead of dirt/grass, loose strings, and broken hay feeders.

5. That she provided photos of horses that show unkept/overgrown feet, which shows inadequate hoof care. Photos attached from June 29, 2026 and July 2, 6, 11, and 12, 2026.
6. That she provided photos of horses with ill-fitting tack, which can create rubs and sores. Photos attached from July 03, 2026.
7. That she provided photos of un-safe pastures; ex: mud manure. Photo attached from July 11, 2026.

P. That Affiant reviewed the photographs for authenticity. Affiant was able to view photos of unsafe horse pastures with broken hay feeders.

Q. That Affiant was able to view photos of horses with overgrown/unkept hooves, which shows inadequate hoof care.

R. That Affiant interviewed Hailey Hayes, who indicated the following:

1. That she was an employee of High Vibe Trail Rides from August 26, 2025 through June 15, 2026.
2. That she observed underweight horses.
3. That she observed empty water troughs multiple times and days.
4. That she observed the horses fighting over hay, as there was rarely enough hay for every horse.
5. That she never observed a veterinarian on property for Ptasznik's horses.

S. That Affiant interviewed Amber McMaster, who indicated the following:

1. That she was an employee of High Vibe Trail Rides from March 2026 through May 2026.
2. That she observed underweight horses.
3. That she observed horses with sickness/injury not receive veterinary care.
4. That she photographed horses with ill-fitting tack, which creates

rusts and sores. Photo attached from May 17, 2026.

T. That Affiant reviewed the photos for authenticity. Affiant was able to view horses with ill-fitting tack, which creates rub and sores.

U. That Affiant also interviewed Isabela Stawiarski, who indicated the following:

1. That she was an employee of High Vibe Trail Rides until 07/28/2026.
2. That she observed underweight horses.
3. That she observed horses fighting over hay, as there was rarely enough hay for every horse.
4. That she observed horses struggling to breathe.
5. That she observed a horse with an open wound that did not receive veterinary care.
6. That she photographed the open wound. Photo attached from July 18, 2026.
7. That she never observed veterinary care for any of the animals.

V. That Affiant reviewed the photo for authenticity. The photo showed a horse with an open wound.

W. That Affiant also interviewed Meredith DeRonne, who indicated the following:

1. That she was an employee of High Vibes Trail Rides during the summer of 2025.
2. That she has known Lucille Ptasznik for about 6 years.
3. That she observed underweight horses.
4. That she observed Lucille Ptasznik beating horses with reign whips multiple times.

5. That she observed Lucille Ptasznik kick horses multiple times.
6. That she observed the pastures filled with mud manure that was very deep.
7. That she never observed any sickly/injured horses receiving veterinary care, per state law.
8. That she observed horses with ill-fitting tack that created rubs and sores.

X. That Affiant also interviewed Jessica Chapman, who indicated the following:

1. That she was an employee for High Vibe Trail Rides from July 2025 through July 4, 2026
2. That she observed underweight horses.
3. That she observed empty water troughs.
4. That she observed horses dripping sweat, tied in the sun/heat without access to water.
5. That she observed unsafe pastures full of mud manure and broken fencing/hay feeders.
6. That she observed horses with overgrown or cracked hooves without proper treatment.
7. That she observed horses with tooth/mouth problems and no veterinary intervention, as required by law.
8. That she observed horses with severe sores and no veterinary intervention, as required by law.

Y. That Affiant also interviewed Lenna Kramer who indicated the following:

1. That she purchased the horse, Ozzy, from Lucille Ptasznik on January 06, 2026.

2. That she observed underweight horses with protruding hips and rib bones.
3. That she was told by Ptasznik that a veterinarian only comes out for an emergency, not routine.
4. That she purchased a horse without vet records and no proof of a negative Coggins test. A negative Coggins test is required for change of ownership and transport. Kramer attached veterinary paperwork that showed many medical problems.
- 5.
6. That she observed and rode a horse in underweight condition.

Z. That Affiant also interviewed Erin Wiles, who indicated the following:

1. That she was on property on July 30, 2026
2. That she observed and photographed underweight horses on July 30, 2026.
3. That she observed and photographed a horse with an open wound on July 30, 2026.
4. That she observed and photographed a horse with a sore on July 30, 2026.
5. That she observed and photographed horses with unkept feet on July 30, 2026.
6. That she observed horses without access to hay on July 30, 2026.

AA. That Affiant reviewed the photos for authenticity. The Affiant was able to view underweight horses in the photos.

AB. That Affiant was able to view photos of horses with sore/open wounds.

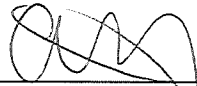
AC. That Affiant was able to view photos of horses with overgrown/unkept hooves, which shows inadequate hoof care.

AD. That Affiant has consulted an expert witness in horse care. Kristine Dvonch is recognized as a subject matter expert in horse abuse cases in several circuit courts in Michigan.

AE. That Affiant interviewed Kristine Dvonch, who reviewed the above information and photos and recognized the same conclusions as Affiant.

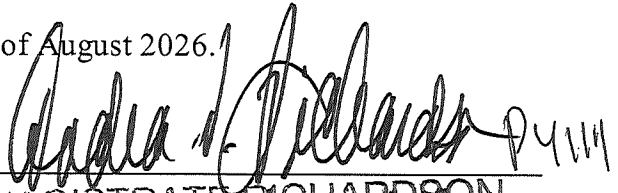
AF. Based upon the above information, Affiant believes that animals at [REDACTED] are being neglected.

AG. That based upon the above information, Affiant believes that execution of the search warrant is essential to the completion of the investigation, and affiant requests authority to search for and seize the described evidence.



Officer Aubrie Mausolf, Affiant

Subscribed and sworn to before me this 4th day of August 2026.



MAGISTRATE RICHARDSON

Judge in and for the

52-1 District

Court,

Oakland County, State of Michigan.

ORIGINAL

52-1 DISTRICT COURT

STATE OF MICHIGAN)
) SS
COUNTY OF OAKLAND)

THE ATTACHED AFFIDAVIT having been sworn to by the Affiant, Officer Aubrie Mausolf, before me this day, based upon the facts stated therein, probable cause having been found; in the name of the People of the State of Michigan I command that you enter the following described place:

therein to search for, seize, secure, tabulate and make return according to law the following property and things:

Any and all evidence of animal cruelty and violations regarding MCL 287.744, and MCL 750.50, including but not limited to any equine, including but not limited to an animals; veterinary records; feeding schedules, receipts for equine food and medical care; documents showing domain and control, indicia of residency and/or occupancy of the premises described, including but not limited to correspondence, bills, envelopes and keys.

IT IS FURTHERED ORDERED that Oakland County Animal Control may photograph the interior and exterior of any barns, sheds, run-ins, lean-tos, trailers, the home, garage, any attached and unattached structures, and pastures at [REDACTED] in the Township of Milford.

ISSUED UNDER MY HAND this 11th day of August 2026.


MAGISTRATE RICHARDSON

Judge in and for the
52-1 District Court,
Oakland County, State of Michigan.

RECEIVED FOR FILING

AUG 11 2026

52-1 DISTRICT COURT

AFFIDAVIT FOR SEARCH WARRANT

STATE OF MICHIGAN)
) SS
COUNTY OF OAKLAND)

Officer Aubrie Mausolf, Affiant, being first duly sworn, on oath deposes and says:

(1) That the following property constitutes evidence of criminal conduct:

Any and all evidence of animal cruelty and violations regarding MCL 287.709, 287.111, 287.112, 287.115, 287.717c, 287.744, and MCL 750.50, including but not limited to any equine, including but not limited to an animals; veterinary records; feeding schedules, receipts for equine food and medical care; documents showing domain and control, indicia of residency and/or occupancy of the premises described, including but not limited to correspondence, bills, envelopes and keys.

(2) Affiant further says that the above-mentioned property is located at the following described place:

All barns, sheds, run-ins, lean-tos, trailers, the home, garage, any attached and unattached structures, and pastures located at [REDACTED] in the Township of Milford, County of Oakland, and the State of Michigan. [REDACTED] is a two-story, ranch style, brown siding, and brown brick dwelling. The Parcel ID Number (PIN) for this property is [REDACTED]. The property is located off [REDACTED] and [REDACTED].

(3) Affiant further says that she has probable cause to believe the above listed property to be searched for and seized is now located upon said described premises, based upon the following facts:

- A. Affiant is an officer with the Oakland County Animal Shelter and Pet Adoption Center and a Deputy with the Oakland County Sheriff's Office, and she has been employed as a law enforcement officer for two years.
- B. Affiant is the officer in charge of an investigation involving the neglect of animals following multiple complaints.
- C. That during the course of the investigation, Affiant was able to determine the owner of the horses as Lucille Ptasznik.

- D. That Affiant determined that Lucille Ptasznik owns High Vibe Trail Rides.
- E. That Affiant was able to determine High Vibe Trail Rides as a Trail riding business that also offers horse riding lessons.
- F. That Affiant determined the horses are used in the trail/lesson riding business.
- G. That Affiant received complaints about how these horses were obtained, example: regarding proper documentation when horses are transported or change of ownership. MCL 287.717c "An equid that changes ownership in this state or that is moved into this state from another state must have an official equine infectious anemia test with a negative result within the previous 12 months. An equid moved into this state from another state must meet the requirements of section 19. (5) an equine infectious anemia laboratory test form shall contain, at a minimum, the color, breed, sex, age, markings, name of owner, and location or address of the equid to which it applies. A photographic or graphic likeness may also be used to demonstrate the color and markings of the equid. An official equine infectious anemia test with a negative result, can also be called a negative Coggins test.
- H. That Affiant determined that Lucille Ptasznik receives horses from auction or slaughter from an unknown supplier every month.
- I. That Affiant determined that the newly obtained horses are added directly with the horses actively working for High Vibe Trail Rides or are sold to others.
- J. That Affiant is unable to verify any veterinary records at this time.
- K. That Affiant determined that High Vibe Trail Rides operates at [REDACTED]
[REDACTED]
- L. That Affiant determined that Lucille Ptasznik keeps horses at both properties : [REDACTED] and [REDACTED]
- M. That Affiant interviewed Montana Kay Rakay, who indicated the following:
1. That she was an employee of High Vibe Trail Rides at [REDACTED]
[REDACTED] during June and July 2026.

2. That she observed underweight horses.
3. That she observed horses with sickness/injury not receiving veterinary care.
4. That she photographed underweight horses with overgrown/cracked feet, which shows inadequate hoof care. Photos attached from July 19, 2026 and July 26, 2026.
5. That she also observed unsafe conditions/pastures for the horses; ex: mostly mud manure instead of dirt/grass and broken hay feeders in the pastures.
6. That she observed sickly animals being bought and sold without seeing a veterinarian, without proper paperwork as per state law. Negative Coggins test must be recorded for change of ownership or transport.
7. That she observed horses fighting over small amounts of hay as there was rarely enough hay for all horses.

N. That Affiant reviewed the photographs for authenticity. Affiant was able to view underweight horses overgrown/unkept hooves, which shows inadequate hoof care in the pictures.

O. That Affiant interviewed Brenda Brierly, who indicated the following:

1. That she was an employee of High Vibe Trail Rides from 2021 through 07/17/2026.
2. That she observed underweight horses.
3. That she observed horses with sickness/injury not receive veterinary care, per state law.
4. That she observed unsafe/unkept pastures; ex: mostly mud manure instead of dirt/grass, loose strings, and broken hay feeders.
5. That she provided photos of horses that show unkept/overgrown feet, which shows inadequate hoof care. Photos attached from June 29, 2026 and July 2, 6, 11, and 12, 2026.

6. That she provided photos of horses with ill-fitting tack, which can create rubs and sores. Photos attached from July 03, 2026.

7. That she provided photos of un-safe pastures; ex: mud manure. Photo attached from July 11, 2026.

P. That Affiant reviewed the photographs for authenticity. Affiant was able to view photos of unsafe horse pastures with broken hay feeders.

Q. That Affiant was able to view photos of horses with overgrown/unkept hooves, which shows inadequate hoof care.

R. That Affiant interviewed Hailey Hayes, who indicated the following:

1. That she was an employee of High Vibe Trail Rides from August 26, 2025 through June 15, 2026.

2. That she observed underweight horses.

3. That she observed empty water troughs multiple times and days.

4. That she observed the horses fighting over hay; as there was rarely enough hay for every horse.

5. That she never observed a veterinarian on property for Ptasznik's horses.

S. That Affiant interviewed Amber McMaster, who indicated the following:

1. That she was an employee of High Vibe Trail Rides from March 2026 through May 2026.

2. That she observed underweight horses.

3. That she observed horses with sickness/injury not receive veterinary care.

4. That she photographed horses with ill-fitting tack, which creates rubs and sores. Photo attached from May 17, 2026.

T. That Affiant reviewed the photos for authenticity. Affiant was able to view horses with ill-fitting tack, which creates rub and sores.

U. That Affiant also interviewed Isabela Stawiarski, who indicated the following:

1. That she was an employee of High Vibe Trail Rides until 07/28/2026.
2. That she observed underweight horses.
3. That she observed horses fighting over hay, as there was rarely enough hay for every horse.
4. That she observed horses struggling to breathe.
5. That she observed a horse with an open wound that did not receive veterinary care.
6. That she photographed the open wound. Photo attached from July 18, 2026.
7. That she never observed veterinary care for any of the animals.

V. That Affiant reviewed the photo for authenticity. The photo showed a horse with an open wound.

W. That Affiant also interviewed Meredith DeRonne, who indicated the following:

1. That she was an employee of High Vibes Trail Rides during the summer of 2025.
2. That she has known Lucille Ptasznik for about 6 years.
3. That she observed underweight horses.
4. That she observed Lucille Ptasznik beating horses with reign whips multiple times.
5. That she observed Lucille Ptasznik kick horses multiple times.
6. That she observed the pastures filled with mud manure that was very deep.

7. That she never observed any sickly/injured horses receiving veterinary care, per state law.
8. That she observed horses with ill-fitting tack that created rubs and sores.

X. That Affiant also interviewed Jessica Chapman, who indicated the following:

1. That she was an employee for High Vibe Trail Rides from July 2025 through July 4, 2026
2. That she observed underweight horses.
3. That she observed empty water troughs.
4. That she observed horses dripping sweat, tied in the sun/heat without access to water.
5. That she observed unsafe pastures full of mud manure and broken fencing/hay feeders.
6. That she observed horses with overgrown or cracked hooves without proper treatment.
7. That she observed horses with tooth/mouth problems and no veterinary intervention, as required by law.
8. That she observed horses with severe sores and no veterinary intervention, as required by law.

Y. That Affiant also interviewed Lenna Kramer, who indicated the following:

1. That she purchased the horse, Ozzy, from Lucille Ptasznik on January 06, 2026.
2. That she observed underweight horses with protruding hips and rib bones.
3. That she was told by Ptasznik that a veterinarian only comes out for an emergency, not routine.

4. That she purchased a horse without vet records and no proof of a negative Coggins test. A negative Coggins test is required for change of ownership and transport. Kramer attached veterinary paperwork that showed many medical problems.

5. That she observed and rode a horse in underweight condition.

Z. That Affiant also interviewed Erin Wiles, who indicated the following:

1. That she was on property on July 30, 2026
2. That she observed and photographed underweight horses on July 30, 2026.
3. That she observed and photographed a horse with an open wound on July 30, 2026.
4. That she observed and photographed a horse with a sore on July 30, 2026.
5. That she observed and photographed horses with unkept feet on July 30, 2026.
6. That she observed horses without access to hay on July 30, 2026.

AA. That Affiant reviewed the photos for authenticity. The Affiant was able to view underweight horses in the photos from July 30, 2026.

AB. That Affiant was able to view photos of horses with sore/open wounds from the photos of July 30, 2026.

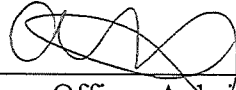
AC. That Affiant was able to view photos of horses with overgrown/unkept hooves from July 30, 2026, which shows inadequate hoof care.

AD. That Affiant has consulted an expert witness in horse care. Kristine Dvonch is recognized as a subject matter expert in horse abuse cases in several circuit courts in Michigan.

AE. That Affiant interviewed Kristine Dvonch, who reviewed the above information and photos and recognized the same conclusions as Affiant.

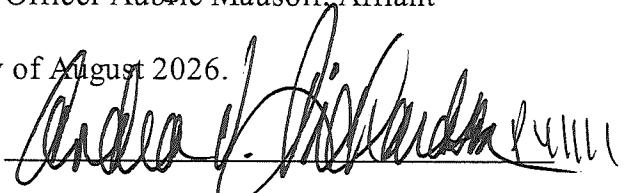
AF. Based upon the above information, Affiant believes that animals at 2471 Meadowood Lane are being neglected.

AG. That based upon the above information, Affiant believes that execution of the search warrant is essential to the completion of the investigation, and affiant requests authority to search for and seize the described evidence.



Officer Aubrie Mausolf, Affiant

Subscribed and sworn to before me this 11th day of August 2026.



MAGISTRATE RICHARDSON

52-1 District Court,

Oakland County, State of Michigan.

EXHIBIT 5

RETURN AND TABULATION

I hereby certify and return that I have executed the search warrant and have obtained the following described property and left a copy of the affidavit and tabulation with said property owner or left a copy of the tabulation in the premises. Please see attached list.

Animal Control Officer: Mausolf

Dated at 4:30 ^{am/pm}

This 12th day of August

Amount	Description	Location
1	Bay G. Gasten	Black haulter #27
1	Palomino m Poppi	teal haulter #30
1	little bay m Bingo	Blue haulter #34-
1	Gray Dapple G. Prince	Black haulter #29
1	Dark bay G Atlas	Black haulter #22-7
1	Chestnut m treasure	pink haulter #35-
1	Chestnut G Luc	green haulter #36-
1	Chestnut m Ember	blue haulter #28
1	Bay m Bonny	black haulter #32
1	Bay m ^{wh} rets	purple haulter #33-
1	Bay m godiva	Green haulter #37-
1	Bay m Amara	Pink/Gray #31 halter

F2 F2 F2

RETURN AND TABULATION

I hereby certify and return that I have executed the search warrant and have obtained the following described property and left a copy of the affidavit and tabulation with said property owner or left a copy of the tabulation in the premises. Please see attached list.

Animal Control Officer: MAYOR 441

Dated at 12:12 am

This 12th day of August

Amount	Description	Location
1	Paint G. legend. red haulter #8	
1	Bay m April pink haulter #11	
1	Bay m Jan light blue haulter #5	
1	Chestnut G. matcha purple haulter #10	
1	Gray G. Amante. Blue haulter #9	
1	Gray G. 4 year old Blue/Green haulter #6	enzo owned

Amount	Description	Location
1	Buckskin m. Memphis	beigh. #24
1	Big Paint m summer	Purple #23
1	Bay m luna	Bluehalter #26
1	little paint m prach	Black leather #25

F2
F3

RETURN AND TABULATION

I hereby certify and return that I have executed the search warrant and have obtained the following described property and left a copy of the affidavit and tabulation with said property owner or left a copy of the tabulation in the premises. Please see attached list.

Animal Control Officer: Mausoli 441

Dated at 12:12 am

This 12th day of August

Amount	Description	Location
1	Buck skin G. Cash	blue/whit hauler #2
1	red roan m. Frisco	black hauler #4
1	Bay G. Dior	black hauler #13
1	Dark bay G. Knox	Blue hauler #15
1	Dark bay m. Dior	Blue/whit hauler #16

F2 F5
F4

RETURN AND TABULATION

I hereby certify and return that I have executed the search warrant and have obtained the following described property and left a copy of the affidavit and tabulation with said property owner or left a copy of the tabulation in the premises. Please see attached list.

Animal Control Officer: Mausolf 441
Dated at 12:12 am on 12
This 12th day of August.

Amount	Description	Location
1	Brown/whit paint Gr. putt putt Greenhauler #7	
1	Dark bay Gr. Boley leather hauler #22 fly mask	
1	Paint m. Chennel Brown hauler #20	
1	Bay m. Uage. Green hauler #18	
1	Bay Gr. On it Purple rope #19	
1	Bay m. bumberny Black hauler #21	

EXHIBIT 6

Summary of findings from Oakland County seizure 8/12/2026

38 horses were examined by Dr. Morgan Falk (Kern Rd Veterinary Clinic) and Kristine Dvonch (Executive Director, Horses' Haven). Notes taken during exam and report compiled and submitted by Kristine Dvonch. Official veterinary notes will be submitted by Dr. Falk as she performs complete exams on each horse.

Overall findings indicate many of the horses need further diagnostics to identify source of lameness, with 24 horses displaying lameness at the trot (industry standards for lameness exams require evaluating a horse in all gaits, notably trotting on a hard surface) and of those 8 were noted severe by Dr. Falk. The barn manager indicated that a total of 3 horses were being given NSAIDS- firocoxib, for lameness issues. A horse with a lameness issue should not be ridden unless diagnosed and treated for pain and cleared for riding by a veterinarian, notable in this case by number of lameness and commercial use of horses. Detailed exams, including radiographs are pending for all horses displaying lameness issues. Next vet days are 8/19, 8/20 and 8/21.

Body condition scores were overall good, although lack of top line, muscle atrophy and poor hair coat condition indicate nutritional needs are lacking. There were some horses with a body condition of concern, most especially for the work these horses are required to perform. Body condition scores were completed on those indicating poor BCS, all horses will have a completed BCS worksheet. Body Condition Scoring can be subjective, becoming less so with completed worksheet, which evaluates and scores 6 individual areas, then averaging score for final BCS.

Notable, concerning wounds needing treatment were a deep corneal ulcer, #22, which barn owner indicated was receiving treatment of triple antibiotic eye ointment. Eye injuries are extremely painful and this horse was noted to be painful on exam, standard of care for treatment of eye injuries includes oral banamine to manage pain. Eye should be re-checked by a veterinarian once per week to ensure healing. The wound on #5 had prolific granulation tissue that needed to be debrided (surgically removed) so treatment could be started and be effective. This was done at Horses' Haven 8/13/2026. Granulation tissue is a common issue with lower limb wounds in horses and becomes prolific when not treated. It inhibits skin growing over wound to heal, without treatment, the wound will not heal. Multiple saddle sores and girth sores were noted on herd as well as many healing wounds and scars. Initial report does not detail all, photos as horses are processed will have more documentation.

Potential DSLD was noted in several horses, one being privately owned. DSLD (Degenerative Suspensory Ligament Desmitis) is a painful, progressive, degenerative disease. In most cases, riding is not recommended for horses with DSLD. Confirming diagnosis would require ultrasound by an experienced sports medicine veterinarian.

All horses had sharp enamel points in mouth which can cause pain when being ridden and can interfere with proper mastication (chewing) of food, which could be contributing to body condition. Industry standards for equine care require a dental float yearly to remove sharp enamel points.

Hoof condition was overall fair, some overdue for trims/shoeing with long hooves.

A large amount of scaring and healing wounds, indicating safety issues with housing/environment and/or overcrowded pastures and/or not enough feeding areas.

A majority of these horses were lame and should have treatment for their pain to be ridden, if some should be ridden all. Further diagnostics will provide needed information on the abilities of these horses have from a medical standpoint.

Following are notes from brief exams performed onsite on 8/12/2026. These will be followed by detailed veterinary notes and diagnosis by Dr. Falk as the horses are processed for vetting at Horses' Haven. Google documents are being created with photos, notes, documentation and diagnostics as received. This process will take several weeks. These notes are not intended to be a complete evaluation of any horse.

#1- Bay gelding, approx. 15 years old, mild right hind lameness, sharp enamel points

#2- Chestnut gelding, approx. 20 years old, mass left flank- hernia, 4 fingers long, 3 fingers wide, sharp enamel points

#3- Bay gelding, approx. 12-15 years old, lame left hind and right hind with tendon sheath effusion and suspected DSLD, sharp enamel points

#4- Bay mare, approx. 12-15 years old, bony proliferation on medial and lateral proximal right front cannon bone with good range of motion, saddle sore right side, sharp enamel points

#5- Belgian mare, approx. 15, wound on right hind medial pastern with prolific granulation tissue, body condition 3.5/9, mild lameness noted at walk, patient was not amendable to trotting at time of exam, further exam/diagnosis needed, sharp enamel points

#6- Grey gelding, suspected DSLD, significantly lame in both hinds, dropped pasterns, sharp enamel points

#7- Bay mare, approx. 7 years old, significantly lame on all 4 limbs, effusion on tendon sheaths, sharp enamel points

#8- Paint gelding, wound right hind dorsal medial cannon, lame right hind and right front, sharp enamel points

#9- Grey gelding, approx. 11 years old, lame right hind, sharp enamel points

#10- Draft cross gelding, approx. late teens, potential DSLD, sharp enamel points

#11- Bay mare, approx. 7/8 years old, scar right hind medial coronary area, tendon sheath effusion both rear hinds, bony proliferation and significant lameness, sharp enamel points

#12- Buckskin gelding, approx. 20 years old, sharp enamel points

#13- Bay gelding, approx. 20 years old, painful swelling over lumbar spine, reactive to palpation, sharp enamel points

#14- Draft mare, approx. 15-20 years old, old harness scars, body condition score 3.5/9, sharp enamel points

#15- Dark bay gelding, approx. 15-20 years old, old wound with skin flap, tendon sheath effusion left hind, bony proliferation right hind proximal cannon bone, healed saddle sores, sharp enamel points

#16- Bay mare, bony proliferation at medial canthus of left eye area, mild left hind lameness, sharp enamel points

#17- Paint gelding, approx. 7 years old, sharp enamel points, feed packing to protect mouth

#18- Bay mare, approx. 7-11 years old, edema in inguinal region, tendon sheath effusion all 4 limbs, lame right hind, sharp enamel points

#19- Bay gelding, approx. 15-20, severe thickening of flexor tendon right front that is painful on palpation, severe thickening of flexor tendon left front, severe lameness, sharp enamel points

#20- Paint mare, approx. 11, sharp enamel points

#21- Dark bay gelding, knee arthritis left front with 50% range of motion, hock effusion and mild lameness left hind, was not able to examine teeth due to patient temperament at this time

#22- Percheron gelding, approx. 20 years old, deep corneal ulcer left eye, needs pain medication and evaluation of current treatment, wound right front pastern wrapped, healing but has purulent discharge indicating further treatment needed, including antibiotics and tetanus shot if not up to date, sharp enamel points

#23- Paint mare, approx. 12-15 years old, enlarged teats, lame left hind and right hind, currently receiving firocoxib, sharp enamel points

#24- Buckskin gelding, approx. 10-15 years old, significant left hind lameness

#25- Paint mare, approx. 7-10 years old, sharp enamel points

#26- Bay mare, 15-20 years old, saddle sore right wither area, mild lameness right hind

#27- Bay gelding, approx. 11 years old, lame left hind, sharp enamel points

#28- Chestnut mare, approx. 11 years old, saddle sores at withers, hock and tendon sheath effusion right hind and left hind, lameness worse in left hind, sharp enamel points

#29- Grey Percheron gelding, approx. 10 years old, bony proliferation left hind medial cannon bone, bony proliferation over lumbar spine, mild lameness right hind, sharp enamel points

#30- Haflinger mare, approx. 11-15 years old, hock effusion left hind and right hind, tendon sheath effusion, mild lameness left hind, sharp enamel points

#31- Bay mare, approx. 11-15 years old, enlarged teats, significant right front lameness, lame left hind, right front fetlock effusion, sharp enamel points

#32- Bay mare, approx. 15 years old, thickened left front and right front flexor tendons, sharp enamel points

#33- Bay pony mare, approx. 20-25 years old, wound right hind, extremely lame, sharp enamel points

#34- Dark bay gelding, approx. 11 years old, lame in all 4 limbs, sharp enamel points

#35- Chestnut mare, approx. 15-20 years old, sore lumbar spine, painful on palpation, tendon sheath and hock effusion on both hinds, sharp enamel points

#36- Chestnut gelding, approx. 11 years old, snotty discharge, tendon sheath effusion and thickened tendons right front and left front, lame, sweaty saddle pad marks, dropped right front pastern, sharp enamel points

#37- Bay mare, approx. 15-20 years old, lame left hind, sharp enamel points

#38- Bay pony mare, approx. 20+ years old, saddle sore at wither

EXHIBIT 7

AUTHORITY: MCL 750.50
COMPLIANCE: Required
PENALTY: Return of Animal(s) to Owner

Incident No: 26-373
Date Seized: 8/12/26
Time: 12pm
Appeal Deadline: 14 days

PTASZNIK

NOTICE OF ANIMAL SEIZURE AND INTENT TO FORFEIT

Seizing Agency Oakland County Animal Control	Phone Number 248-858-1070	
Individual to contact for bond/security information Animal Control Supervisor or their designee	Address 1200 N. Telegraph Bldg 42E Pontiac, MI 48341	
Address Where Seized: Number and Street 2471 Meadowood lane	City, State Milford, MI	Zip 48380
Circumstances: Investigating animal neglect		

Animals Seized

Animal ID	Species	Sex	Color	Other
404388 - Armonny	Horse	male	Bay	
404351 - April	Horse	female	Bay	
404352 - Legend	Horse	male	Black & white	
404353 - Java	Horse	Female	Bay	
404354 - Nacho	Horse	Male	Chestnut	
404355 - Amante	Horse	male	Grey	
404357 - Memphis	Horse	Female	Buckskin	
404358 - Rumer	Horse	Female	Paint	
404359 - Luna	Horse	Female	Bay	

The seizing agency intends to forfeit and dispose of the above animals according to the provision of state law, MCL 750.50. An owner/possessor of the animal(s) may wish to challenge the seizure and forfeiture of the animal(s). An owner/possessor may post a security deposit/bond that may prevent the forfeiture of the animal(s) for the duration of the criminal, forfeiture, or other court proceeding until the court makes a final determination regarding the animal's disposition. Failure to post a security deposit/bond within 14 days after the date on this notice will result in forfeiture of the animal(s). An owner/possessor may, before the expiration of the 14 day period request a hearing from the court with jurisdiction on whether the security deposit/bond is justified and whether the cost of the security deposit/bond is fair and reasonable for the care and provision for the seized animal(s).

The owner/possessor of the seized animal(s) is responsible for all costs for the care of the seized animal(s) unless the court determines that seizure of the animal(s) was not substantially justified by law.

PROOF OF SERVICE

9589 0710 5270 2682 2261 19

Owner/Possessor Known	☒ YES ☐ NO		
Date Served 8/14/2026	Service Type ☒ In-Person ☐ Posted at Location of Seizure ☒ Certified Mail		
Person Served Lucille Ptasznik	Address: Number and Street 2685 west Commerce	City, State Milford, MI	Zip 48380
Signature of Server	Date Signed	Reviewed By	

Additional Animals Seized

[illegible]

AUTHORITY: MCL 750.50
COMPLIANCE: Required
PENALTY: Return of Animal(s) to Owner

Incident No: 26-3173
Date Seized: 8/12/2026
Time: 4pm
Appeal Deadline: 14 days

PTASZNIK

NOTICE OF ANIMAL SEIZURE AND INTENT TO FORFEIT

Seizing Agency Oakland County Animal Control		Phone Number 248-858-1070	
Individual to contact for bond/security information Animal Control Supervisor or their designee		Address 1200 N. Telegraph Bldg 42E Pontiac, MI 48341	
Address Where Seized: Number and Street 2685 West Commerce Road		City, State Milford, MI	Zip 48380
Circumstances: Investigating animal neglect			

Animals Seized

Animal ID	Species	Sex	Color	Other
404387 - Gaston	Horse	male	Bay	
404386 - Popi	Horse	female	Palomino	
404385 - Bingo	Horse	Female	Bay	
404384 - Prince	Horse	male	grey dapple	
404383 - Atlas	Horse	male	dark bay	
404382 - Treasure	Horse	Female	chestnut	
404381 - Louie	Horse	male	chestnut	
404380 - Ember	Horse	female	chestnut	
404379 - Bonnie	Horse	Female	Bay	

The seizing agency intends to forfeit and dispose of the above animals according to the provision of state law, MCL 750.50. An owner/possessor of the animal(s) may wish to challenge the seizure and forfeiture of the animal(s). An owner/possessor may post a security deposit/bond that may prevent the forfeiture of the animal(s) for the duration of the criminal, forfeiture, or other court proceeding until the court makes a final determination regarding the animal's disposition. Failure to post a security deposit/bond within 14 days after the date on this notice will result in forfeiture of the animal(s). An owner/possessor may, before the expiration of the 14 day period request a hearing from the court with jurisdiction on whether the security deposit/bond is justified and whether the cost of the security deposit/bond is fair and reasonable for the care and provision for the seized animal(s).

The owner/possessor of the seized animal(s) is responsible for all costs for the care of the seized animal(s) unless the court determines that seizure of the animal(s) was not substantially justified by law.

PROOF OF SERVICE

Owner/Possessor Known ☒ YES ☐ NO			
Date Served 8/14/2026	Service Type ☐ In-Person ☒ Certified Mail ☐ Posted at Location of Seizure		
Person Served Lucille Ptasznik	Address: Number and Street 2685 West Commerce	City, State Milford, MI	Zip 48380
Signature of Server	Date Signed	Reviewed By	

Additional Animals Seized

[illegible]

ANIMAL SEIZURE SECURITY DEPOSIT/BOND INFORMATION

Incident No:	26-3173
Date Seized:	8/12/2026
Time:	12pm & 4pm
Appeal Deadline:	14 days

Number of Animals Seized:	37
Initial intake cost per animal:	\$1,265.64
Total Initial Intake Cost:	46,828.60
Daily Cost per Animal per Day:	\$15 per day x 37
Total Cost per Day:	\$555
Total Daily Cost for 30 days:	16,650
Bond/Deposit for 30 Days:	\$63,478.60

Beginning Date for Deposit/Bond:	8/12/2026
Ending Date for Deposit/Bond:	9/11/2026

Owner/Possessor Posting Deposit/Bond

Name:	Phone:		
		email:	
Address: Number and Street		City, State, Zip	
ID#			

Security Deposit/Bond Information

Total:	
Cash	☐
Check	☐
Credit Card	☐

Owner/Possessor Signature	
Date:	

Received by:	
Date:	