

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION**

**MARY CATHERINE SCHEFFKE,**  
individually and as Founder of Chicago  
French Bulldog Rescue, Inc., NFP,  
*Plaintiff,*

v.  
**SUSAN SCHULZ and VICTORIA McELIGOTT,**  
individually and as Directors of Chicago  
French Bulldog Rescue, Inc., NFP,

*Defendants,*  
and  
**CHICAGO FRENCH BULLDOG RESCUE, INC.,  
NFP,**  
*Nominal Defendant.*

Case No. 2026CH04709

Hon. Eve M. Reilly

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**PLAINTIFF'S REPLY IN SUPPORT OF HER  
MOTION FOR PRELIMINARY INJUNCTION**

The Response rests on one proposition: that this Board may fire the founder, take her home, sell the Rescue's only real asset, and do all of it beyond review. None of that survives contact with Defendants' own documents. The firm branding her compensation illegal inurement is the same firm that designed it, certified it lawful, billed the Rescue for that opinion, and is now billing the Rescue to say the opposite. The Court found Plaintiff likely to succeed on May 21. Nothing here changes that. The injunction should issue.

**I. The Removal Is the Predicate, and the Removal Was Void. Everything Else Collapses With It.**

Defendants' severance argument, that employment and tenancy may be ended at will once Plaintiff is removed, has a predicate it never establishes: *Krum v. Chicago Nat. League Ball Club, Inc.*, 365 Ill. App. 3d 785, 788-89 (1st Dist. 2006) and *Crain v. Burnett*, 190 Ill. App. 407, 411 (3rd Dist. 1914) presuppose an actual discharge by a body with authority to act. *Crain* reaches a discharge rightful or wrongful, but a void removal is no discharge at all, and here the body's

authority is the contested question this Court has already found Plaintiff likely to win; their 108.55 fallback does not rescue them because their resolution invoked Section 9.2 of a document (2009 unadopted Bylaws) this Court has likewise found Plaintiff likely to prove void.

## **II. Defendants' New Reading of the 2008 Bylaws Renders Their Own Provision Meaningless.**

Cornered by the for-cause language, Defendants now argue that Section 5 merely lists automatic removal triggers, leaving directors removable for any reason under 805 ILCS 105/108.35(a). (Resp. at 8–9.) Read that against the text: if a director may be removed for any reason at all, Section 5 accomplishes nothing, and a board that may remove for any reason has no need of a list of three. Defendants' construction makes their own provision surplusage, which is precisely what the law forbids. The natural reading is the one Defendants resisted until this brief: Section 5 states the causes for removal, Section 108.35(a) sets a default the bylaws displace, and this one did.

## **III. The Firm Attacking Plaintiff's Compensation Is the Firm That Built It, for a Fee, and Now Attacks It, for More.**

Defendants' inurement attack collapses on their own exhibits. Exhibits 2 and 3 are Wagenmaker & Oberly's own confirmation letter and board resolution from 2018, in which the firm created the Executive Director position, set the salary, required Plaintiff to live on-site as a condition of employment, and expressly confirmed the housing was excludable under Section 119 as being for the convenience of the employer. Wagenmaker & Oberly was paid to build and bless this arrangement in 2018 and is now being paid to tear it down in 2026, reversing itself against the same client on the same subject for a second fee. That is a disqualifying conflict that Defendants do not mention, and the Court should give the inurement argument the weight its conflicted, self-contradicting source deserves, which is none. Nor can Defendants take refuge in *Palm v. 2800 Lake Shore Drive Condo. Ass'n*, 2014 IL App (1st) 111290, ¶ 112: the good-faith reliance that

doctrine protects is not reliance on counsel that built this arrangement, blessed it for a fee, and now reverses its own 2018 opinion against the same client, disqualified under Rules 1.7, 1.9, and 3.7.

#### **IV. The “Neglect” Evidence Is a Phone Call, Offered to Override the State’s Own Written Report.**

Defendants' gravest accusations, 'verge of hoarding' and Russell 'dragging himself around his pen,' appear nowhere in the Department of Agriculture's report. They appear in a declaration by Susan Schulz, who says that after Plaintiff filed her emergency motion she called the inspector, who supposedly told her these things over the phone. (Ex. 24, 2nd Schulz Dec. ¶¶ 4–8.) If the inspector had found these things, there would be a written report saying so. There is none. Defendants do not attach the report because the report, Exhibit Q, found every category acceptable, the animals in good health, and the facility clean and approved for licensure. Schulz concedes the inspector never even saw the second floor. (Id. ¶ 9.) As for Russell dragging himself: he is paralyzed, and that is simply how a paralyzed dog moves when out of his wheelchair. Anyone who has cared for a paralyzed dog would know this, as Plaintiff, who has cared for such dogs for eighteen years, attests. (Scheffke Decl. ¶ 21.) Nor is this her word alone. Two non-party witnesses who cared for these dogs inside the Channahon home, one a veterinary technician and former Rescue director, attest the dogs are clean and well cared for, and Russell's treating veterinarian, who fosters paralyzed dogs herself, confirms his dragging is the normal mobility of a paralyzed dog, not neglect. (Bates Decl.; Worthington Decl.; Deyo Decl. ¶ 7.)

#### **V. The Business Judgment Rule Does Not Shield Action Taken Without Authority or by Self-Interested Directors.**

The business judgment rule protects informed, good-faith decisions by disinterested directors acting within their authority. These directors meet none of those conditions. They acted under a bylaw provision that does not exist, while their own authority was the contested question, paying conflicted counsel from charitable funds to do it. *Goldberg* states that courts will not

interfere absent bad faith, fraud, illegality, or gross overreaching, and that due care is a prerequisite directors who fail to exercise may not use as a shield. *Goldberg v. Astor Plaza Condo. Ass'n*, 2012 IL App (1st) 110620, ¶ 62. A board that removes a director under a nonexistent bylaw acts without authority. A board that stops all intakes and cancels a cancer surgery the night before the operation while paying the law firm acts with wanton bad faith and gross overreaching. Defendants invoke *Kern* and *Zannis* for the idea that personal animosity alone does not disqualify a director, but *Kern* addressed financial self-interest under the for-profit Business Corporation Act, not self-dealing, and *Zannis* expressly limits its principle to lawful acts. These acts are not lawful. The interest at stake is not mere dislike. It is self-dealing: directors using this charity's money to keep seats they will not vacate and cannot justify. That is not diligence. That is not care. The rule does not protect them, nor does Section 108.70(a) afford shelter: its immunity falls away for willful or wanton conduct, and self-dealing entrenchment funded by charitable money is exactly that.

#### **VI. The Breach of Fiduciary Duty Here Belongs to the Directors, Not to Plaintiff.**

Three directors have spent over \$10,000 of donated funds not on a single dog but on a campaign to remove the founder, with no offer to settle or compromise. They stopped all intakes on May 8, 2026, the one thing a rescue exists to do because a founder is easier to evict if she has no dogs in her care. They have still not meaningfully complied with this Court's May 21 Order restoring Plaintiff's fund access: the replacement debit card they provided carries a \$1,000 limit, useless against the \$8,519.66 deposit Tulip's cancer surgery requires. (Scheffke Decl. ¶ 22.) Donors have noticed: two complaints filed with the Attorney General's Charitable Trust Bureau, among many received by Plaintiff, are attached as (Ex. G) A director who believed the founder was mismanaging had honest options: negotiate, step aside, or start their own rescue. These

directors chose none. Their prized 2022 rent email proves Plaintiff's case: a woman earning \$2.17 an hour who paid rent late was subsidizing the Rescue, not looting it.

### **VII. Plaintiff's Personality Is Not a Ground for Removal or a Factor in This Motion.**

What blankets Defendants' voluminous response is not evidence of mismanagement but the personal animus of a controlling bloc that would rather spend this charity into the ground than part with their board seats. Plaintiff is called blunt and difficult; assume every word is true: the 2008 Bylaws permit removal only for defined cause, and being forceful is not among them.

These declarants are not neutral. Their most credentialed, Kim Alboum, offers veterinary opinions she is not qualified to give and writes from a personal grievance (Scheffke Decl. ¶¶ 9–10). She states the board is aligned against Plaintiff – confirming what is already obvious, that this is a concerted campaign, not disinterested oversight.

### **VIII. The Equities and the Irreparable Harm Are Unchanged, and the Court Has Already Found Them.**

This Court already found on May 21 a fair question on the merits, irreparable harm, and a balance favoring Plaintiff, since Defendants lose only the ability to act before a hearing. Nothing in the Response disturbs those findings. Their foster list confirms the harm rather than answering it. Russell's own treating veterinarian, Dr. Deyo attests that the specialized care these IVDD dogs require cannot be transferred to an inexperienced foster without meaningful risk to their health and welfare. (Ex. D, Dr. Deyo Decl. ¶ 9.)

### **CONCLUSION**

The Response does not defeat Plaintiff's Motion; it proves it. This case is not about bylaws or business judgment, but about animals whose welfare depends on what this Court does today.

Russell is paralyzed. The fosters Defendants propose have already failed paralyzed dogs in the Rescue's care: they returned Caleb after they feared him and he tried to bite during diapering

and cart transfers, behavior he has never repeated with Plaintiff, and Elle deteriorated in that same home with recurrent urinary infections, bladder stones, and diaper sores. (Scheffke Decl. ¶ 17.) There is no damages remedy for a paralyzed dog placed in a home that cannot keep him well.

Tulip has biopsy-confirmed bilateral thyroid carcinoma. Her oncologist found no evidence of spread, recommended surgery, and advised that removal before the cancer spreads averages three or more years of survival time. (Ex. F, Tulip oncology records.) VCA Aurora prepared a written surgical plan estimated at over \$11,000. (Ex. E; Scheffke Decl. ¶ 22.) On June 10, the very day her veterinary team put the surgical recommendation in writing, and the night before the operation, this Board cancelled it. Defendants would now foster Tulip, a cancer patient they have denied surgery, with the very defendant who cancelled it. No remedy after the fact gives Tulip back the three years that surgery could have given her.

This was not a close call. *Tulip's treating veterinarian, a board-certified surgeon, and a radiologist-oncologist all recommended the surgery, and the treating veterinarian has sworn the Board cancelled it without consulting her and against Tulip's best interest.* (Dr. Trudeau Decl. ¶¶ 7-10.) A board that is spending over \$10,000 in donor money on lawyers to remove its founder, while denying Tulip the surgery that could give her years, has betrayed the dogs and the donors alike. This board has ceased to be entitled to any presumption of acting in good faith.

Whether these directors keep their seats is for this litigation to resolve; what the Court can do today is ensure the animals survive long enough to see the answer.

For these reasons, Plaintiff respectfully requests that the Court grant the Motion, preserve the status quo through final hearing, and enforce the fund-access provision of its May 21 Order.

Respectfully submitted,

/s/ R Tamara de Silva  
**DE SILVA LAW OFFICES, LLC**  
R Tamara de Silva, Esq.  
110 North Wacker Drive, Suite 2500  
Chicago, IL 60606  
Office: (312) 500-8424  
tamara@desilvalawoffices.com

/s/ Jonathan Lubin  
**LAW OFFICE OF JONATHAN LUBIN**  
Jonathan Lubin, Esq.  
8800 Bronx Avenue, Suite 100-H  
Skokie, IL 60077  
Telephone: (773) 954-2608  
jonathan@lubinlegal.com

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**EXHIBITS TO PLAINTIFF'S REPLY IN SUPPORT OF HER MOTION FOR  
PRELIMINARY INJUNCTION**

**LIST OF EXHIBITS:**

- 1) **Exhibit A- Affidavit of Dr. Lynn Trudeau, DVM**
- 2) **Exhibit B - Affidavit of Doris Worthington**
- 3) **Exhibit C - Affidavit of Rebecca Bates**
- 4) **Exhibit D - Affidavit of Dr. Jennifer Deyo, DVM**
- 5) **Exhibit E - Tulip's Surgery Estimate**
- 6) **Exhibit F - Radiologist/Oncologist Diagnosis and Recommended Treatment for Tulip**
- 7) **Exhibit G - Complaints to Illinois Attorney General Charitable Trust Bureau**
- 8) **Exhibit H - Affidavit of Katie Andrews**
- 9) **Exhibit I - Affidavit of Mary Catherine Scheffke**

**EXHIBIT A**  
**Affidavit of Dr. Lynn Trudeau, DVM**

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
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*Plaintiff,*

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**DECLARATION OF LYNN TRUDEAU, D.V.M.**

1. I, Lynn Trudeau, D.V.M., declare as follows. I make this declaration based on my personal knowledge and my direct professional relationship with Mary Catherine Scheffke and the dogs in her care over many years. If called to testify, I could and would testify competently to the matters set forth herein.

**Professional Background**

2. I am a licensed veterinarian and Staff Veterinarian at VCA Forest South Animal Hospital. I completed my undergraduate studies at William Woods College in Fulton, Missouri, and received my Doctor of Veterinary Medicine degree from the University of Illinois in 1990. I have been in veterinary practice for over thirty-five years.

**My Relationship with Mary Scheffke and Chicago French Bulldog Rescue**

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3. I have been the treating veterinarian for dogs in the care of Chicago French Bulldog Rescue, and for Mary Catherine Scheffke personally, for approximately eighteen years. Over that period I have developed extensive firsthand knowledge of how Ms. Scheffke cares for the Rescue's animals, how she makes medical decisions on their behalf, and what her presence and involvement means to the dogs in her charge.
4. Ms. Scheffke is a constant and familiar presence at our clinic. She comes in not only for her own animals, but to meet fosters, to support them, and to help them understand the medical needs of the dogs they are caring for. She translates complex veterinary information into terms fosters can understand and ensures they have the knowledge and supplies necessary to properly care for them. Over eighteen years, Mary has been a constant at Forest South. She has spent countless hours with us gaining knowledge and experience with many complex medical situations encountered with the French Bulldog breed she loves.
5. In my professional opinion, Mary Scheffke is an exceptionally capable caregiver and medical advocate for the animals in the Rescue's charge. She has been making sound medical decisions for these dogs for eighteen years. She understands the conditions these animals present with, she follows veterinary recommendations carefully, she asks the right questions, and she acts promptly when something changes. The standard of care she provides is not ordinary rescue care. It is the kind of dedicated, informed, attentive management that produces good outcomes for medically fragile animals.

**Tulip: Diagnosis, Review, and Surgical Recommendation**

6. I have been Tulip's treating veterinarian from the very beginning of her care at the Rescue. I know Tulip's history, her baseline condition, and the full arc of her medical course.

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7. Tulip has been diagnosed with cancer. In the course of managing her case I reviewed reports from the radiologist and oncologist who examined her, and I reviewed all of the relevant imaging, including ultrasounds and x-rays. Based on that review, and on my own clinical examination and knowledge of Tulip, I assessed her current status carefully.
8. The imaging and specialist reports showed that Tulip's cancer has not spread to her lymph nodes, her lungs, or her chest. That finding is significant. It means that at this time, Tulip's cancer is localized, and that surgical intervention is medically indicated and appropriate. Based on my review of everything in the record, and my knowledge of this patient, I recommended that Tulip proceed with surgery.

Tulip's cancer is aggressive, and the window in which surgery can make a meaningful difference is not unlimited. The surgery would relieve Tulip's discomfort, and ideally provide her with additional longevity and improved quality of life. In my professional judgment, she deserves that chance, and the time to act is now, while the cancer remains localized and the surgery remains viable.

10. I understand that the Board of the Rescue voted to cancel this surgery. I was not consulted about that decision. The recommendation for surgery is supported, not only by myself, but a board-certified surgeon, and radiologist/oncologist. Time is of the essence for surgical intervention as this neoplasia can quickly progress. Cancellation/delay of Tulip's surgery was not made in her best interest.

**The Risk of Disrupting Ms. Scheffke's Care for These Animals**


11. I have treated the Rescue's dogs for eighteen years. I have seen the care they receive from Ms. Scheffke firsthand, and I have seen the difference that continuity of care makes for medically

fragile animals. These are not easy dogs. Many of them have serious, complex, ongoing conditions that require a caregiver who knows their history, monitors their status, and responds quickly to changes. Ms. Scheffke does all of those things. She has done them consistently for eighteen years.

12. In my professional opinion, disrupting the care these dogs currently receive from Ms. Scheffke would put their health and welfare at risk. A new caregiver, however well-intentioned, would not have the medical knowledge, the familiarity with each animal, or the established relationships with the treating veterinary team that Ms. Scheffke brings. Building that takes time these animals may not have.

13. Mary Scheffke has devoted eighteen years of her life to these animals. In my experience as her veterinarian and as someone who has personally witnessed the difference she has made in these pets lives , her position is not just a job it is a calling. The animals in her care are in better hands than most animals I see in any context, rescue or otherwise. It would be a serious disservice to them to remove her.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

Signed by:  
  
62C8AD3E140B426...

Lynn Trudeau, D.V.M.  
Staff Veterinarian  
Dated: June 11, 2026

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**EXHIBIT B**  
**Affidavit of Doris Worthington**

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
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**MARY CATHERINE SCHEFFKE,**  
individually and as Founder of Chicago  
French Bulldog Rescue, Inc., NFP,  
*Plaintiff,*

v.

**SUSAN SCHULZ and VICTORIA  
McELLAGOTT, individually and as**  
Directors of Chicago French Bulldog  
Rescue, Inc., NFP,  
*Defendants,*

and

**CHICAGO FRENCH BULLDOG RESCUE,  
INC., NFP,**  
*Nominal Defendant.*

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**DECLARATION OF DORIS WORTHINGTON**

1. I, Doris Worthington, of [REDACTED] iana, declare as follows. I make these statements voluntarily in support of Mary Scheffke. The statements in this declaration are based on my personal knowledge, and if called to testify I could and would testify competently to them.
2. I am a veterinary technician. I began volunteering with Chicago French Bulldog Rescue (the "Rescue") in early 2016. When I joined, Ms. Scheffke welcomed me and said she appreciated that, as a veterinary technician, I could help with medical cases as a foster. Since then I have fostered more than twenty dogs for the Rescue, including very fragile puppies, and Ms. Scheffke was always supportive and available to help when needed.
3. I served as a member of the Rescue's Board of Directors from late 2018 until early 2021, when I stepped down to care for my son, who had a kidney transplant.

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4. Ms. Scheffke founded the Rescue eighteen years ago and built it into an organization that many others depend on, including other rescues, shelters, breeders, and veterinary hospitals. She continually educates herself about the disabilities and diseases of this breed so that she can best treat the dogs in the Rescue's care, asking questions and doing research to give each dog the best chance possible. Ms. Scheffke often takes the toughest cases, and she has frequently been the only person on whom several medically fragile dogs could depend.
5. Ms. Scheffke has an uncanny ability to read a dog's individual needs and to match that dog to the right foster home and, ultimately, the right adoptive home. Those of us who worked with her called it her "gut feeling."
6. I personally know that Ms. Scheffke has sacrificed herself for the dogs in this Rescue. She is completely dedicated to the Rescue's work, hardworking, and talented at organizing both people and dogs, and she has never wavered from her original vision.
7. As the leader and president of the Rescue, Ms. Scheffke has had to work with many different kinds of people, from veterinarians to breeders, and with a large and diverse group of volunteers, primarily women, who vary in age, experience, and temperament. Running a rescue is emotionally demanding work, and Ms. Scheffke carries the weight of every loss, every happy adoption, and the personal struggles of the volunteers as well. In my opinion, no such group always gets along, and volunteers are free to step away when conflicts arise. Stepping away has never been an option for Ms. Scheffke, because this Rescue is her life.
8. I have been to the Rescue's property in Channahon several times, both for intakes of dogs from puppy mills and as a meeting place to pick up foster dogs. I have first-hand knowledge of the property and of the conditions in which the dogs are kept there. Based on what I have

personally observed, and on my training as a veterinary technician, the dogs in Ms. Scheffke's care are well taken care of, well socialized, and clean.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

DocuSigned by:



691ED843F49847A  
Doris Worthington

Dated: 6/11/2026, 2026

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**EXHIBIT C**  
**Affidavit of Rebecca Bates**

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
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**DECLARATION OF REBECCA BATES**

1. I, Rebecca Bates, declare as follows. The statements in this declaration are based on my personal knowledge, and if called to testify I could and would testify competently to them.
2. I have been involved with French Bulldogs for approximately twenty-seven years. I have shown French Bulldogs in conformation, and over the years I fostered dogs for Chicago French Bulldog Rescue (the “Rescue”) and handled adoption applications, adoptions, and intakes for it. My first foster for the Rescue was a dog named Zorro. I now live in Iowa, and the observations in this declaration are from the years I was actively involved with the Rescue and with the dogs in Mary Scheffke’s care.
3. I have never served as a director or officer of the Rescue. My involvement was as a volunteer and foster. I have no role in the governance dispute that is the subject of this case, and I get along with the people involved in the Rescue.

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4. I have known Mary Scheffke for many years. Over an extended period, I personally cared for dogs in Ms. Scheffke’s care, including dogs named Hank, Faith, Hope, Cupcake, and Stella, before Stella passed away. Several of these dogs were paralyzed and used wheelchairs, which we call carts. I personally handled these dogs, including getting them in and out of their carts myself, and they were comfortable and well-behaved in my care.
  
5. I have personally observed the condition of the dogs in Ms. Scheffke’s care, and they were clean, healthy, and well cared for. The dogs spent significant time out of their crates, in play and outdoors. I personally brought multiple dogs, including dogs in carts, outside to an exercise area, and I watched them play together. Based on what I personally observed, the dogs were not confined to crates for anything approaching twenty-two hours a day, and any claim that they were is false and contrary to what I saw firsthand.
  
6. I have personally been inside the home at the Channahon property where Ms. Scheffke cares for the dogs. I observed the home and the dogs in it, and the dogs were all clean and very well cared for.
  
7. I have adopted dogs from the Rescue, including a dog named Troy, who was one of the dogs known as the “Jordan 15.”

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

Signed by:

*Rebecca Bates*

Rebecca Bates

Dated: 6/11/2026, 2026

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**EXHIBIT D**  
**Affidavit of Dr. Jennifer Deyo, DVM**

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**DECLARATION OF JENNIFER DEYO, D.V.M.**

1. I, Jennifer Deyo, D.V.M., declare as follows. I make this declaration based on my personal knowledge and professional observations. If called to testify, I could and would testify competently to the matters stated herein.

**Qualifications**

2. I am a licensed veterinarian and Staff Veterinarian at VCA Boone Animal Hospital. I earned my undergraduate degree from the University of Illinois and my Doctorate of Veterinary Medicine from the University of Minnesota College of Veterinary Medicine. I am certified in Veterinary Medical Acupuncture. I have a particular interest in the human-companion animal bond and in the care of medically complex animals. I have personal experience fostering and

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adopting French Bulldogs, including paralyzed dogs, and I have firsthand knowledge of the specialized care those animals require.

### **My Relationship with Mary Scheffke and the Rescue**

3. I have known Mary Scheffke and have been the treating veterinarian for dogs in the care of Chicago French Bulldog Rescue since 2014. Through that relationship I have developed direct, firsthand knowledge of how Ms. Scheffke cares for the animals in her charge. I am making this declaration voluntarily to assist the Court in having an accurate picture of their care.

### **The Standard of Care Ms. Scheffke Provides**

4. In my professional opinion, Mary Scheffke provides an excellent standard of care to the French Bulldogs in the Rescue's charge. I have observed this firsthand on numerous occasions. Ms. Scheffke contacts me promptly when a dog's condition changes, follows veterinary directives carefully, and advocates persistently for each animal's wellbeing.
5. The care Ms. Scheffke provides goes well beyond what is standard for a rescue environment. She manages animals with complex, ongoing medical conditions that require specialized knowledge built over years of hands-on experience with this breed. French Bulldogs are a brachycephalic breed with a distinctive physiology that makes their medical management more demanding than that of most dogs. Ms. Scheffke has developed deep familiarity with those demands.

### **Medically Vulnerable Dogs: Russell and the Care IVDD Dogs Require**

6. I am familiar with some of the dogs currently in Ms. Scheffke's care, including Russell, who is paralyzed as a result of intervertebral disc disease (IVDD). Russell has significant ongoing medical needs that require experienced, attentive care.

7. Regarding Russell: it is important for the Court to understand that a dog paralyzed by IVDD does not become fully mobile simply because he has a wheelchair. The wheelchair assists with locomotion, but paralyzed dogs require substantial ongoing care even after receiving a cart. That care includes physical therapy and range-of-motion exercises to preserve muscle mass and prevent contractures, regular monitoring and management of bladder and bowel function since paralyzed dogs often cannot void independently, diligent hygiene to prevent urine scalding and pressure sores, and careful observation for signs of pain, discomfort, or neurological change. A dog like Russell, when he is not in his wheelchair, moves by dragging himself. That is the normal and expected mobility of a paralyzed dog; it is not a sign of neglect. It is the reason drag bags exist and the reason mobility carts are fitted with stirrups to protect the rear paws. Recognizing the difference between a dog moving as a paralyzed dog moves and a dog in distress requires experience with this condition. I have that experience, having fostered and adopted paralyzed French Bulldogs myself.

#### **The Irreplaceable Nature of Ms. Scheffke's Care**

9. In my professional opinion, the care Ms. Scheffke provides to these animals cannot simply be transferred to an inexperienced foster without meaningful risk to the animals' health and welfare. The medically fragile dogs in her care, particularly those with IVDD, require a caregiver who understands their specific medical histories, has experience managing their conditions on a daily basis, and can recognize and respond to subtle changes in their status. Building that kind of knowledge takes time and experience that a new caregiver would not have from the outset.
10. I have personally fostered and adopted French Bulldogs, including paralyzed dogs. I understand from that experience, as well as from my professional training, how demanding

this care is and how much depends on the consistency and experience of the caregiver. The bond between these animals and Ms. Scheffke, and the knowledge she has built caring for them, is not interchangeable.

**Ms. Scheffke's Dedication to the Animals**

11. Caring for the animals in this Rescue is not a job for Ms. Scheffke. It is her life's work and her mission. I have observed that dedication directly and over an extended period. She does not operate within regular hours. She responds immediately when a medical concern arises. I am saddened that the organization and the animals are being placed at risk by this dispute.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

Signed by:  
*Jennifer L. Deyo, DVM*  
51120F3C88514AE...

Jennifer Deyo, D.V.M.  
Staff Veterinarian, VCA Boone Animal Hospital

Dated: 6/11/2026, 2026

FILED DATE: 6/12/2026 3:30 PM 2026CH04709

**EXHIBIT E**  
**Tulip's Surgery Estimate**

| Prepared: 6/5/2026 at 11:21 | Treatment Plan: 775283298

Client	Patient
Chicago French Bulldog Rescue (#137273) Mary Scheffke 25540 S Blackberry Ln Channahon, IL 60410	Tulip (#240969) Species: Canine (Bulldog, French ) Sex: Female Spayed   Color: Gray Birth: 05/18/2021   Age: 5y   Weight: 8.7 kg



**Detailed Information**

Date	Description	Qty	Price	Total Low Price
Day 1	Surgery InHouse Referral	1	\$266.05	\$266.05
	Heska PT/aPTT	1	\$281.95	\$281.95
	- Element COAG+ (Heska) PT/aPTT REPORT	1	\$0.00	\$0.00
	Nova ICU/ER Panel	1	\$282.15	\$282.15
	Anesthesia 1-2.5hr Risk 2	1	\$724.20	\$724.20
	- Anesthesia Setup by Specialist	1	\$332.10	\$332.10
	CeFAZolin (gen) 100mg/mL/mL	1.9	\$45.17	\$45.17
	CeFAZolin (gen) 100mg/mL/mL	1.9	\$45.17	\$45.17
	Thyroidectomy K9	2	\$5,162.90	\$5,162.90
	- Bupivacaine Liposome (Nocita) 13.3mg/mL/mL	3.4	\$89.96	\$89.96
	Histopathology Initial Site	1	\$469.55	\$469.55
	- Histopathology 1 Addl Site	1	\$161.00	\$161.00
	Hospitalization Setup	1	\$85.25	\$85.25
	Hospitalization/hour	12	\$248.40	\$248.40
	IV Fluids Setup	1	\$293.45	\$293.45
	Fluids IV Maintenance/hour	12	\$196.80	\$196.80
	Pain Management Level 1	1	\$101.10	\$101.10
	Nova Ionized Calcium	1	\$78.40	\$78.40
Day 2	MISC Prescription	1	\$397.85	\$430.67
	Fluids IV Maintenance/hour	12	\$196.80	\$196.80
	Hospitalization/hour	24	\$496.80	\$496.80

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	Nova Ionized Calcium	2	\$156.80	\$156.80
	Pain Management Level 1	1	\$101.10	\$101.10
	Calcium Carbonate (gen) 500mg Chew InHouse Use	8	\$8.48	\$9.18
Day 3	Hospitalization/hour	24	\$496.80	\$496.80
	Nova Ionized Calcium	2	\$156.80	\$156.80
Day 4	Hospitalization/hour	18	\$372.60	\$372.60
	Nova Ionized Calcium	1	\$78.40	\$78.40

THIS TREATMENT PLAN AND ESTIMATE MAY RANGE FROM: \$11,359.55 to \$13,063.48\*

Client Initials: \_\_\_\_\_

**AUTHORIZATION FOR MEDICAL AND/OR SURGICAL TREATMENT**

I, the undersigned, certify that I am the owner, or authorized agent for the owner, of the animal, "Tulip". I authorize the doctor on duty and assistants to perform the procedures listed in the above treatment plan and estimate, including administration of pain relief medications, sedatives and/or anesthetics, as well as any necessary and appropriate medical, radiological, surgical, diagnostic and/or emergency care for Tulip.

I have been advised as to the nature of the procedures and the potential risks, and I understand the reason why such medical and/or surgical treatment is considered necessary, as well as its advantages, and possible complications, if any. I also understand that no guarantee of successful treatment can be made. In some cases, it is impossible to accurately estimate the total charges involved because the total extent of the injuries or illness may not be immediately apparent. The results of blood tests, urinalysis, radiographs, etc. may be needed before the doctor can approximate a total expense. Additionally, it is impossible to accurately estimate the time an individual animal needs to respond to a treatment plan and this factor will affect the total cost. It is understood that these are estimated fees.

If additional treatment is needed that exceeds the estimated range, the hospital will contact me with an updated treatment plan and estimate to obtain my permission to proceed, and I will increase my deposit accordingly. In the event that any urgent care requirements arise and the hospital makes a reasonable attempt but is not able to contact me, I grant permission to render to Tulip whatever emergency and life-stabilizing treatments are deemed necessary by hospital personnel and agree to pay for these emergency and life-stabilizing treatments even if they exceed this estimate. I understand that prices on this treatment plan and estimate are valid for 30 days from the document date.

If additional care is necessary, that exceeds the initial estimate, we will require payment of the current balance in full plus an additional 75.00% of the new estimate.

Client Initials: \_\_\_\_\_

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For hospitals not open 24 hours a day, please be advised that if your pet is hospitalized or otherwise stays overnight or after hours, there may be periods during which there are no personnel on the premises. I give permission for the hospital and its affiliates to use any remaining samples from my pet to check and improve lab testing quality.

**A MINIMUM DEPOSIT OF 75.00% OF THE ESTIMATE IS REQUIRED: \$8,519.66**

I assume full financial responsibility for all charges and services incurred to Tulip while in the hospital and agree to pay all such charges at the time of release of such patient.

I hereby certify that I have read and fully understand this authorization for medical and/or surgical treatment.

**Important Patient/Client Information:**

Phone numbers where you can be reached today:

Phone: \_\_\_\_\_ Call me  Text me  Notes: \_\_\_\_\_

Phone: \_\_\_\_\_ Call me  Text me  Notes: \_\_\_\_\_

What time did your pet last eat: \_\_\_\_\_

Employee notes/comments: \_\_\_\_\_

**I hereby certify that I have read and fully understand this Treatment Plan Authorization. Signature of Owner or Responsible Agent Must be 18 years of age or older**

Signature: \_\_\_\_\_ Print Name: \_\_\_\_\_ Date: \_\_\_\_\_

Employee Signature (if applicable below):

Signature: \_\_\_\_\_ Print Name: \_\_\_\_\_ Date: \_\_\_\_\_

**Summary**

Patient Name	Total Price	Total Tax	Low Total	High Total
Tulip	\$11,326.03	\$33.52	\$11,359.55	\$13,063.48*

Previous Balance:	\$0.00
Estimate Low Total:	\$11,359.55
Estimate High Total *:	\$13,063.48*
<b>Grand Total range:</b>	<b>\$11,359.55 - \$13,063.48*</b>

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\*APPLICABLE TAXES MAY BE ADDED TO HIGH TOTALS.

TREATMENT PLAN

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**EXHIBIT F**  
**Radiologist/Oncologist Diagnosis and Recommended Treatment for Tulip**



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Mary Scheffke (137273) | Tulip | Canine (Bulldog, French) | Gray | F: S | 5y (05/18/2021)

3 business days of receipt of the laboratory results. If you prefer direct contact with our specialist, a fee will be implemented or you can schedule a recheck appointment at VCA Aurora Animal Hospital.

### **Meagan R Sowders, DVM, MS, DACVR Radiation Oncology**

Access to diagnostic images: If diagnostic imaging was performed on your pet during your visit to our hospital. Our hospital provides you with the ability to access to your pet's medical imaging study directly through our website. To access these images, type <https://vcahospitals.com/aurora/specialty/for-vets/diagnostic-imaging> in your internet browser's address bar. In the box provided, enter your pet's Patient ID Number. This can be found in the upper right-hand corner of either your estimate or receipt, next to the name of your pet. Click on the Search button, and a separate window will open, which will list your pet's imaging studies. Click on the study desired and another window will open displaying the images.

To view the images, left-click and hold the thumbnail image on the left side of the screen, then drag and drop it into the larger viewing area on the right side of the screen.

If you have any difficulty accessing your pet's images, please call us at (630) 301-6100 and ask for the Radiology Department.



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Mary Scheffke (137273) | Tulip | Canine (Bulldog, French) | Gray | F: 5 | 5y (05/18/2021)

Following radiation treatment, patients are rechecked at 2 weeks post radiation for a side effect recheck then at 6 weeks post radiation for an exam and ideally a neck ultrasound +/- thyroid level testing. Regular follow up with exams, restaging (chest radiographs and neck ultrasound) and monitoring of thyroid levels is performed every 3 months for the first year, then every 6 months. Thyroid levels can become decreased following either removal or treatment of the thyroid glands, typically within the first 1-6 months following treatment which is why it is important to monitor thyroid levels on a regular basis and supplement patients as needed.

**Medications:** None prescribed today.

Tulip will be sleepy today from sedation. Offer small amounts of food and water at a time and resume normal activity tomorrow.

Please continue all preventative medications (heartworm/flea/tick) as previously prescribed. Vaccines should be withheld for 3 months after radiation therapy.

**Follow up:** We will call in a few days with results.

If your pet is going through radiation therapy, please do not have your pet's hair cut or give a bath before, during or after radiation therapy unless cleared by the doctor.

If you are concerned about how your pet is feeling prior to the next appointment, please call us as we may need to allocate more time for your pet's appointment. Please note if you are 15 minutes or more late for your appointment, it may have to be rescheduled.

All diagnostic imaging is performed on a first come, first serve basis and patients cannot be signed up for imaging prior to arrival so there may be a wait to accommodate all patients in the hospital that require imaging. All imaging procedures may require sedation to be performed properly. If your pet is due for imaging, please fast them for the appointment.

Please note any and all medication refill requests must be made during regular business hours, Monday-Thursday 9am-4pm and on Friday 9 am - 12 pm by calling in or in person and may take 1-2 business days to fill. Refills will not be granted without regular exams. After hour refill requests or refill requests after hours without prescribed refills will be associated with additional fees and will be dispensed in limited quantities of up to 7 days. After hour refills must be picked up at the hospital and outside prescriptions will not be provided.

If you have questions, please call (630) 301-6100 for the radiation oncology veterinarian or a staff member between 9 am - 4 pm Monday - Thursday and 9 am - 12 pm on Friday. Please email us at [aurora.radonc@vca.com](mailto:aurora.radonc@vca.com) with any non-urgent, after hour concerns. It may take 24-48 hours for correspondence. If you have a life threatening concern about your pet after hours, please seek veterinary medical attention.

We are happy to help with your pet's further medical needs. If testing is performed at your primary care veterinarian, we are happy to provide consultation services with your veterinarian via phone, fax or email. We will respond within 2 -



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Mary Scheffke (137273) | Tulip | Canine (Bulldog, French) | Gray | F: S | Sy (05/18/2021)

there is little data to support response rates but we assume most dogs will behave similarly to those treated with definitive intent radiation but likely a little less so in terms of response, with one veterinary paper expressing roughly 10-12 months of tumor control but possible a quicker response in regards to reduction but not elimination in clinical signs within 2-3 weeks after stereotactic radiation therapy is complete.

For dogs with tumors that cannot be removed and are causing marked clinical signs, and/or have distant spread at the time of diagnosis, a more limited radiation therapy protocol can be used that involves radiation given twice per week for a total of 5 treatments (on a Monday/Thursday or Tuesday/Friday type schedule) or once weekly over 4 weeks. This protocol results in tumor control for approximately 6-8 months with some patients surviving 1-1.5 years.

Side effects from the treatment include irritation of the skin and loss of hair in the treatment field as well as a sore throat.

Prior to radiation, a CT scan must be performed under general anesthesia to plan radiation therapy. This CT scan is valid to use for planning purposes for about 2 weeks as long as the tumor does not change. It typically takes about 3 business days to complete a radiation therapy plan. In order to start planning, a deposit for 75% of the high end of the estimate provided is required, of which includes a non-refundable treatment planning fee. Once the plan is complete, a staff member will call to set up initiation of treatment. Once treatment starts the balance for treatment cost can be paid at the last day of therapy.

Patients must be dropped off for treatment between 8:30-9:30am for each treatment and you will be notified each day once treatment is complete to arrange pick up before 5pm Monday-Thursday and by 3-4 pm on Friday. Treatments are not at the same time every day. Patients must be fasted prior to each treatment due to anesthesia. Anesthesia is required for every treatment.

3) CHEMOTHERAPY and PALLADIA: Intravenous chemotherapy may be considered for dogs with very large tumors or tumors that have regional or distant spread of disease. However, the role of chemotherapy in treating thyroid carcinomas is not well defined. In general, we see about 30-50% of patients respond to chemotherapy alone with a partial response. Most dogs tolerate chemotherapy well, with some dogs experiencing mild side effects such as decreased appetite, occasional vomiting or a decreased white blood cell count. Less than 5% of dogs will experience severe side effects requiring hospitalization.

Another option may be to consider treatment with an oral chemo drug called Palladia. This drug works by inhibiting receptors on the surface of tumor cells that help the tumor to grow. In addition, this drug also inhibits receptors important in the growth of new blood vessels, referred to as angiogenesis. Palladia is generally used when the tumor cannot be removed or there is significant spread present in the lymph nodes or lungs (i.e., when bulky disease is present). The major side effects of Palladia involve the intestinal tract and include loss of appetite, vomiting, diarrhea and lethargy. In general, with either a modification of dose or schedule or the addition of medications to help with these side effects, most dogs will tolerate treatment with Palladia.

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Mary Scheffke (137273) | Tulip | Canine (Bulldog, French) | Gray | F: 5 | 5y (05/18/2021)

mild cardiomegaly, despite no heart murmur on exam. We did quickly/briefly check the heart with ultrasound and she does have some mild cardiomegaly and thickening of the valves, more on the left side but possibly present on right. The neck ultrasound today confirmed bilateral thyroid origin of the masses with a thick connecting band. The mass are fairly well defined. There were multiple medial retropharyngeal nodes present bilaterally that were minimal enlarged, rule out metastatic vs reactive. Sampling was performed of the closest medial retropharyngeal node and submitted for cytology review. Final radiologist reports are pending.

Thyroid level was submitted to recheck the level.

It may be a consideration to have a cardiac evaluation for an echo.

At this time, the masses are surgical. I would caution thoroughly that when bilateral masses have to be removed, there is a higher risk for complications and a need for follow up through internal medicine for management of thyroid levels and calcium levels, often requiring life long management and medications. If the lymph nodes are metastatic, then radiation following surgery will be recommended to try to address localized spread vs chemotherapy.

If surgery is not pursued, then radiation alone in the aggressive or palliative setting vs chemotherapy can be performed.

#### Treatment options and prognosis

1) **SURGERY:** For patients with a thyroid tumor that is not attached to the underlying tissues, surgery is the best treatment option. In patients with a mass that can be removed and no evidence of spread, the average dog will survive 3 years or longer following surgery. If the entire tumor cannot be removed during surgery (i.e., tumor cells are left behind, termed incomplete excision), radiation therapy also is recommend. If surgery is performed to debulk a thyroid tumor that is more invasive and non-moveable (attached to underlying tissues), average survival with surgery alone is 6-12 months. If tumor is present in both thyroid glands, removal of both thyroid glands is generally not recommended unless you can commit to follow up for management due to high risk of loss of the parathyroid glands which control electrolytes and hormones.

2) **RADIATION THERAPY:** Radiation therapy is used to eliminate tumor cells that remain following incomplete tumor removal, and as a treatment option for tumors that cannot be removed with surgery. For incompletely removed tumors or tumors that cannot be removed but have not spread to other parts of the body (regional lymph node metastatic disease not included), definitive radiation therapy is used to control the tumor. This consists of daily treatments administered Monday through Friday for 3 weeks (15 total treatments). With this protocol in the incompletely removed setting, most dogs will be tumor free locally for 2-3+ years or longer. With this protocol in the gross disease setting, tumors will stabilize or decrease in size with survival of 80% at 1 year and 72% at 3 years - average of 2 years of control. It can take anywhere from 8 to 22 months to achieve maximal reduction in tumor size.

Another aggressive treatment option to consider is using stereotactic radiation. This involves 3-5 treatments where we deliver high doses of radiation to the tumor with sharp drop offs in dose to the surrounding tissues. Unfortunately,



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Mary Scheffke (137273) | Tulip | Canine (Bulldog, French ) | Gray | F: S | 5y (05/18/2021)

### Radiation Oncology Service - Home Care Instructions

Patient: Tulip, 5y, Bulldog, French , F: S

Client: Mary Scheffke

Referral Partner: VCA Forest South Animal Hospital

May 28, 2026

**Diagnosis:** Thyroid carcinoma, bilateral

- Cytology and biopsy diagnosis
- 2vCXR 4.28.26
- Hypothyroid (minimally) on bloodwork 4.28.26
- 3vCXR and neck US 5.28.26 - cardiomegaly, no signs of spread, bilateral thyroid masses confirmed, mild lymph node enlargement

**Recommendations and Prognosis:** Your dog has been diagnosed with a tumor of the thyroid gland (thyroid carcinoma). Thyroid glands are two organs in the neck that produce thyroid hormone, which plays an important role in metabolism and other functions. Although most canine thyroid tumors do not produce excessive thyroid hormone, the majority of tumors are malignant, meaning they can invade into the surrounding tissues and spread to other sites in the body, with about 35-40% of dogs will have metastatic disease at presentation and up to 80% will ultimately develop metastatic disease. Metastatic potential increases with the size of the mass (>23cm<sup>3</sup> or up to 100% if >100cm<sup>3</sup> tumor volume) and if the mass is present on both sides of the neck (by 16-fold). Dogs with thyroid tumors may be evaluated by a veterinarian for a mass or swelling in their neck or signs such as coughing, change in bark, raspy breathing or difficulty breathing.

Diagnosis of a thyroid carcinoma can often be made by sampling the tumor with a small needle (fine needle aspirate) and examining cells under the microscope. Additional tests, such as needle aspirates of lymph nodes in the neck and chest x-rays are recommended to look for spread of the tumor. Bloodwork (complete blood count, biochemical profile and thyroid level) is also recommended to assess the dog's general health and ability to handle further treatment. A neck ultrasound or CT scan may be recommended prior to treatment to assess the extent and invasiveness of the tumor or sometimes to confirm thyroid origin. Treatment of thyroid tumors is dictated by the size of the tumor, invasion into surrounding tissues, whether the tumor has spread to other parts of the body and whether or not the tumor is producing thyroid hormone. It is important to note that even if a dog has evidence of spread to the lungs, this spread often grows very slowly and dogs with spread can sometimes live for 1 year or longer.

For Tulip, I recommended to perform three view chest radiographs, neck ultrasound, recheck a thyroid level and consider abdominal ultrasound to look for any co-morbidities. All were consented to be performed except the abdominal ultrasound at this time.

Sedation was needed for imaging. Chest radiographs today showed no overt signs of spread but she does have some



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Mary Scheffke (137273) | Tulip | Canine (Bulldog, French) | Gray | F: S | 5y (05/18/2021)

**Primary Care Facilities:** VCA Forest South Animal Hospital

**Owner's Name:** Scheffke, Mary

**Patient Name:** Tulip

**Appointment Date:** June 10, 2026

**Diagnosis:** Thyroid neoplasia

**Recommendations:** Bilateral thyroidectomy

**Client Instructions:**

*Medications-*

- Continue all medications as directed.
- Please bring ALL medications (in their original bottles) with you when you drop Tulip off.

*Fasting-*

- Please withhold food after midnight the night prior to Tulip's procedure. If diabetic, give 1/2 dose of insulin with 1/2 of Tulip's normal breakfast.
- Water is ok to give.

*General guidelines-*

- You are welcome to bring Tulip's own food for in hospital use. Raw diets are not permitted.
- Dr. Jessica Corrie will contact you once Tulip's procedure is completed.
- If you would like to be contacted by a nurse when Tulip's procedure is starting, please let us know.

Tulip is scheduled for a drop off appointment at \_\_\_\_\_ am on \_\_\_\_\_ .

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**EXHIBIT G**  
**Complaints to Illinois Attorney General Charitable Trust Bureau**



Office of the  
Illinois Attorney General  
**Kwame Raoul**



## Charitable Trust Complaint

Fill out the form on line and click submit at the end of the form to send by email or print and mail to address above. Include copies (no originals please) of any supporting documents.

**PLEASE NOTE: Charitable Trust Registrations and Annual reports cannot be submitted by email and will be rejected upon receipt if submitted to this email.**

### Your Information

**Title \***  Mr.  Mrs.  Ms. **First Name \*** [REDACTED] **Last Name \*** [REDACTED]

**Address \***  
**Street Address**  
 [REDACTED]  
**City** [REDACTED] **State** [REDACTED]  
**Zip Code**  
 [REDACTED]

**Daytime Phone** [REDACTED] **Extension** [REDACTED] **Evening Phone** [REDACTED] **Extension** [REDACTED] **Cell** [REDACTED]

**Your E-mail Address \***  
 [REDACTED]

Preferred phone number(s) for communications with our office regarding your complaint:

Daytime Phone  Evening Phone  Cell Phone

### CHARITABLE ORGANIZATION ABOUT WHICH YOU ARE COMPLAINING:

**Name**  
 Chicago French Bulldog Rescue

**Street Address**  
 Administration 1340 West Fletcher or Mail 201 West Lake St Ste 118

**City** Chicago (60657) or Chicago (60606) **State** Illinois

**Zip Code** 60657 or 60606 **County** Cook

**Telephone** (773) 931-4860 **Ext.**

**Website**  
 www.frenchieporvous.org

Are you currently employed by the entity that you are complaining about?

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Yes  No

#### YOUR COMPLAINT

Please describe, in as much detail as possible, the circumstances of this complaint. You may use additional sheets if necessary.

I have been a DONOR to the Chicago French Bulldog Rescue (CFBR) for as long as it has been in existence, and I have known the FOUNDER Mary Scheffke back when she was a Foster for the French Bulldog Club Of America Rescue League. Mary Scheffke is the most self sacrificing (for the benefit of the rescue dogs) person I have ever met. I have seen her use her own meager money to buy needed medications and special foods for delicate rescue dogs. I am a French Bulldog Club of America lifetime member and have been a breeder/owner/handler for over 35 years but I have always supported rescue because it is the right thing to do. CFBR, FBRN (French Bulldog Rescue Network) and FBDCARL. I am appalled that the board members are using funds that I donated, my husband donated and my friends donated to for the purpose of ousting the FOUNDER of CFBR Mary Scheffke. They have used at least \$10,000 to procure legal advice to throw Mary out of her apartment that she pays rent on, to take her vehicle that is used to take dogs to and from the vet, and to procure rescues from shelters and from owner surrenders as well as doing home checks on prospective fosters and new owners. Profanity laden text messages from this board and then legal action with what I am feeling is MY MONEY should not be tolerated. Every cent should be replaced out of the pockets of those wishing harm to Mary Scheffke. My late husband hand tooled wallets with French Bulldogs on them and we paid all expenses to do so and they were auctioned off and some went for as much as \$500. To think that his arthritic hands who fashioned these pieces of art is going for LEGAL FEES to OUST the FOUNDER of this otherwise worth while non profit makes my blood boil. The art itself was donated by yet another supporter of Mary Scheffke the Founder and pillar of Chicago French Bulldog Rescue. Most of us feel that Mary "IS" Chicago French Bulldog Rescue, because we have physically seen her man the donation booth at the National Specialty, fund raise for these dogs, screen prospective owners, take dogs with their rectums hanging out to the vet, go without sleep doing round the clock care for medically fragile dogs, and to think that her own board is willing to make her homeless, take her job, her transportation, and place fragile dogs with inexperienced fosters is disgusting and a gross miss use of MY DONATIONS as well as everyone elses who I have spoken to.

#### PLEASE DO NOT SEND ORIGINALS. ATTACH COPIES OF DOCUMENTS THAT RELATE TO YOUR COMPLAINT.

639971748_10233997287246194_8395554499490508680_n.jpg	480.07KB
639973081_10233997331567302_3522337272580953326_n.jpg	515.85KB
639984083_10233997330927286_8861098609946566005_n.jpg	402.43KB
644189621_10234157046080065_1978727665299317381_n.jpg	131.32KB
644527789_10234157044400023_5991260649190647697_n.jpg	152.98KB
645428842_10234157046920086_6458729724321297144_n.jpg	153.14KB
645498776_10234157046720081_561695730035030977_n.jpg	203.96KB
645562049_10234157044080015_1864642954514001796_n.jpg	194.86KB
645498776_10234157046720081_561695730035030977_n.jpg	203.96KB

#### ADDITIONAL INFORMATION

**Have charitable funds been lost, wasted or diverted from proper charitable purposes? Please provide approximate monetary amount. \***

Yes, at least 10,000 used for legal fees to oust the FOUNDER Mary Scheffke at this point in time it is estimated that the amount misused is more than that.

**Have you filed a complaint about this incident or facility or condition with any other government entity (Federal, State or Local)? If so, what entity?**

NO

**What action has been taken, either within the organization or with other law enforcement agencies, to try and resolve the problem?**

They have not complied with a TRO to return the necessary credit cards and financial support status of the Founder Mary Scheffke

#### PLEASE READ AND SIGN BELOW:

The Illinois Attorney General cannot obtain personal relief or financial compensation on your behalf. In filing this complaint, I understand that the Attorney General is not my private attorney but represents the public to enforce the provisions of the Charitable Trust Act and the Illinois Solicitation for Charity Act. I acknowledge that the Attorney General's Office will use its discretion to determine whether an investigation is warranted, and that decision should not be considered a determination of the merits of my allegations or the result of a comprehensive finding of fact or law. I understand that, if I have any questions concerning my legal right or responsibilities, I may contact a private attorney. I also understand that, under most circumstances, my complaint and any documents submitted with my complaint, may be considered a public record and may be available to a member of the public upon request, subject to the exemptions provided under the Freedom of Information act, 5 ILCS 140/7 and 5 ILC 140/7.5.

I certify that I have read this complaint, and that the information that I have provided is true and accurate to the best of my knowledge.

Signature: \_\_\_\_\_ DATE: \_\_\_\_\_ PHONE #: \_\_\_\_\_



Office of the  
Illinois Attorney General  
**Kwame Raoul**



## Charitable Trust Complaint

Fill out the form on line and click submit at the end of the form to send by email or print and mail to address above. Include copies (no originals please) of any supporting documents.

**PLEASE NOTE: Charitable Trust Registrations and Annual reports cannot be submitted by email and will be rejected upon receipt if submitted to this email.**

### Your Information

Title \*      First Name \*      Last Name \*

Mr.    Mrs.    Ms.      [REDACTED]      [REDACTED]

Daytime Phone      Extension      Evening Phone      Extension      Cell

[REDACTED]      [REDACTED]      (9) [REDACTED]      [REDACTED]      (!) [REDACTED]

Your E-mail Address \*

at [REDACTED]

Preferred phone number(s) for communications with our office regarding your complaint:

Daytime Phone    Evening Phone    Cell Phone

### CHARITABLE ORGANIZATION ABOUT WHICH YOU ARE COMPLAINING:

Name  
Chicago French Bulldog Rescue

Street Address  
25540 S Blackberry Lane

City      State  
Channahon      Illinois

Zip Code      County  
60410      Will

Telephone      Ext.  
(773) 938-4860

Website  
www.frenchieporvous.org

Are you currently employed by the entity that you are complaining about?

Yes    No

### YOUR COMPLAINT

Please describe, in as much detail as possible, the circumstances of this complaint. You may use additional sheets if necessary.

I am a donor to this rescue and wish to bring to your attention that 3 Directors of this above mentioned rescue- a 501(c)(3) have misappropriated donation money for medical needs of foster dogs in the care of the rescue for a person vendetta to remove the founder who is also a director to pay for their legal fees- \$10,000. I am asking you to please investigate this misappropriation of funds and hold them accountable.

\$10,000

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PLEASE DO NOT SEND ORIGINALS. ATTACH COPIES OF DOCUMENTS THAT RELATE TO YOUR COMPLAINT.

### ADDITIONAL INFORMATION

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Have charitable funds been lost, wasted or diverted from proper charitable purposes? Please provide approximate monetary amount. \*

\$10,000

Have you filed a complaint about this incident or facility or condition with any other government entity (Federal, State or Local)? If so, what entity?

No

What action has been taken, either within the organization or with other law enforcement agencies, to try and resolve the problem?

### PLEASE READ AND SIGN BELOW:

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The Illinois Attorney General cannot obtain personal relief or financial compensation on your behalf. In filing this complaint, I understand that the Attorney General is not my private attorney but represents the public to enforce the provisions of the Charitable Trust Act and the Illinois Solicitation for Charity Act. I acknowledge that the Attorney General's Office will use its discretion to determine whether an investigation is warranted, and that decision should not be considered a determination of the merits of my allegations or the result of a comprehensive finding of fact or law. I understand that, if I have any questions concerning my legal right or responsibilities, I may contact a private attorney. I also understand that, under most circumstances, my complaint and any documents submitted with my complaint, may be considered a public record and may be available to a member of the public upon request, subject to the exemptions provided under the Freedom of Information Act, 5 ILCS 140/7 and 5 ILC 140/7.5.

I certify that I have read this complaint, and that the information that I have provided is true and accurate to the best of my knowledge.

Signature: \_\_\_\_\_ DATE: \_\_\_\_\_ PHONE #: \_\_\_\_\_

**EXHIBIT H**  
**Affidavit of Katie Andrews**

To Whom It May Concern,

My name is Katie Andrews, and I have served as President of French Bulldog Village for the past five years. I have been involved in French Bulldog rescue for more than 15 years, volunteering in a variety of capacities. I have also worked directly with the French Bulldog Club of America at its National Specialty Rescue Event each year.

I have known and worked closely with Mary Scheffke for the past five years. Mary has been a mentor to me throughout my tenure as President. She has consistently provided guidance, support, and advice whenever I needed it. Whether I was facing a complicated medical case, a challenging behavioral issue, or an organizational concern, Mary was always willing to share her knowledge and experience. There was never a time when she was unwilling to take my call or offer assistance.

Mary has dedicated her life to Chicago French Bulldog Rescue. With 18 years of experience, she has built an exceptional organization and established a reputation for collaboration and support within the rescue community. She has always been willing to assist other rescues and share her expertise. Her extensive knowledge of this complex breed is truly invaluable.

Mary has also helped me navigate the many challenges that arise when managing a volunteer-based organization. Volunteer groups inevitably encounter personality conflicts, disagreements, and concerns regarding policies and procedures. Mary consistently approached these situations with wisdom, professionalism, fairness, and tact. She understands that policies exist to protect both the dogs and the volunteers who serve them. Her leadership and experience have been an invaluable resource to me and countless others.

In my opinion, Mary is essential to the daily operations of Chicago French Bulldog Rescue. Her days are devoted entirely to the care and welfare of the dogs. She coordinates veterinary appointments, reviews adoption applications and medical records, manages the intake of new dogs, evaluates volunteer applications, conducts home visits, and oversees social media and rescue operations. Her commitment is extraordinary.

I am deeply troubled by the events currently unfolding within Chicago French Bulldog Rescue. I am particularly concerned that funds donated for the care of rescued dogs are being used for legal expenses. This concern is heightened by the fact that CFBR currently has a young dog,

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Tulip, in its care who has been diagnosed with cancer and requires critical surgery. I understand that this surgery was canceled by the remaining Board members. It is difficult not to question whether resources being directed toward legal fees could instead be helping dogs like Tulip receive the care they urgently need.


I am also concerned about reports that efforts are being made to place several special-needs dogs currently in Mary's care with other organizations. As a rescue leader, I firmly believe that once an organization accepts responsibility for an animal, it has an obligation to provide care for that animal until it is adopted—or for the remainder of its life if adoption is not possible. This commitment is a core value of French Bulldog Village, and it has long been a defining principle of Chicago French Bulldog Rescue under Mary's leadership. It is one of the many reasons CFBR has been regarded as such a special and respected organization.

As both the President of French Bulldog Village and a donor to Chicago French Bulldog Rescue, I can no longer support the organization based on the decisions that have been made by the remaining Board members. I do not believe I am alone in these concerns.

If Mary is removed from the rescue she founded 18 years ago, I believe Chicago French Bulldog Rescue will lose the leadership, vision, and dedication that made it the outstanding organization it is today. In my opinion, CFBR will never be the same without Mary at its helm.

Thank you for your time and consideration. Please feel free to contact me if you have any questions.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

Signed by:  
  
9CDCF5B4C57B430...

Katie Andrews

President, French Bulldog Village



Date: 6/11/2026

**EXHIBIT I**  
**Affidavit of Mary Catherine Scheffke**

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION**

**MARY CATHERINE SCHEFFKE,**  
individually and as Founder of Chicago  
French Bulldog Rescue, Inc., NFP,

*Plaintiff,*

v.

**SUSAN SCHULZ and VICTORIA McELLIGOTT,**  
individually and as Directors of Chicago  
French Bulldog Rescue, Inc., NFP,

*Defendants,*

and

**CHICAGO FRENCH BULLDOG RESCUE, INC.,  
NFP,**

*Nominal Defendant.*

Case No. 2026CH04709

Hon. Eve M. Reilly

Calendar 7

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**DECLARATION OF MARY CATHERINE SCHEFFKE**

1. I, Mary Catherine Scheffke, declare as follows. I make this declaration in support of my Motion for Preliminary Injunction and in reply to the declarations submitted with the Rescue’s Response. The statements below are based on my personal knowledge, except where I state that I was informed by another, and as to those matters I believe them to be true. If called to testify, I could and would testify competently to them.

**Background**

2. I am the founder of Chicago French Bulldog Rescue, Inc., NFP (the “Rescue”). I founded the Rescue and built it, largely on my own, into the organization it is today. Until May 7, 2026, I served as its President. I live on the Rescue’s property at 25540 S. Blackberry Lane,

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Channahon, Illinois, and I am the primary caregiver for the medically fragile dogs in the Rescue's care.

3. I have never euthanized a dog for convenience, and I never would. In every instance in which I have made the difficult decision to euthanize a dog, I did so only on the advice and counsel of a treating veterinarian, and only for the dog's sake.

### **The Daily Care of the Dogs**

4. The declaration of Sandra Jaggi states that the dogs spend twenty-two or more hours a day in cages or pens. That is false, and Ms. Jaggi is not in a position to know what she claims. She did not spend twenty-two hours a day, or anything approaching it, at the property, and she has no basis to describe how the dogs spend their days.
5. In fact, the dogs spend significant time outdoors, on outings away from the property, and in play, training, and therapy as each dog needs. One of the Rescue's dogs, Hope, was a wheelchair-bound therapy dog who worked with children to help them learn to read. The care these dogs receive is the opposite of the picture Ms. Jaggi paints.

### **The Two Dogs Referenced by Ms. Jenkins (Cupcake and Faith)**

6. Ms. Jenkins's declaration claims that I put two dogs down in connection with moving into the new building. That is categorically false. The two dogs were Cupcake and Faith. Each was euthanized on veterinary advice because of the medical decline of condition, not for any reason connected to a move and not for convenience. I would never make such a decision for convenience, and I did not do so here.
7. Ms. Jenkins's declaration also falsely claims that I agreed to conduct fundraising at the shelter. I never agreed or promised any such thing. I have consistently been concerned about the risk

of dogs being stolen, and for that reason I would not have agreed to open the shelter for fundraising events. I did, in fact, board Ms. Jenkins's own dog at the Rescue.

8. Ms. Jenkins resigned after the Rescue purchased the shelter property, and it is unclear how she would have knowledge of rent payments after her departure. To the extent she claims rent was not paid, I deny it. On one occasion I made a lump-sum rent payment in cash that was not credited to my account until some time afterward, which may be the source of any confusion.

**Kim Alboum**

9. Kim Alboum, who submitted a declaration as Exhibit 7, adopted a puppy from the Rescue. After the adoption, Ms. Alboum complained of severe behavioral problems with the puppy. The dog's foster family had not observed any such behavioral problems while the dog was in their care. Ms. Alboum is not a neutral observer of the Rescue or of me.
10. Ms. Alboum is not a veterinarian. Her declaration offers opinions about veterinary matters, including the Rescue's leptospirosis vaccination protocol. Decisions about which vaccines are appropriate for the dogs in the Rescue's care, particularly a brachycephalic breed such as the French Bulldog, are made by the dogs' treating veterinarians, on their advice, not on the policy preferences of a non-veterinarian.

**Kelly Dworniczek**

11. Defendants rely on the declaration of Kelly Dworniczek, a former director and treasurer who later left the Rescue and who herself prepared a set of bylaws that were never adopted. Ms. Dworniczek is not a disinterested witness, and during her time with the Rescue her own conduct repeatedly harmed the organization.

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12. I was informed by VCA Boon, a veterinary hospital, that Ms. Dworniczek was banned from the hospital. I was told that she went to the hospital and screamed at the staff, repeatedly proclaiming that she is a lawyer, to the point that she was told she was not welcome there.
13. While she was a director, Ms. Dworniczek failed to renew the Rescue's liability insurance. As a result, the Rescue had difficulty obtaining subsequent coverage and its premiums increased. One insurance representative told me that Ms. Dworniczek had been difficult to work with and had repeatedly insisted that she is a lawyer. Ms. Dworniczek also failed to pay the insurance on the Rescue's van.
14. Ms. Dworniczek further delayed providing the Rescue's accounting firm with access to the records it needed, and according to the accountant created a significant mess that the Rescue had to pay the accountant additional fees to untangle. To the extent Ms. Dworniczek complains that I preserved roughly \$20,000 as a reserve, I believe that reserve was a prudent precaution. Veterinary care for a single medically fragile French Bulldog can exceed tens of thousands of dollars, and maintaining funds for such emergencies protects the dogs.

### **The Jordan 15**

15. Defendants suggest that my engagement of outside counsel reflects poorly on me. The opposite is true. In the matter of the Jordan 15 bulldogs, every other lawyer who looked at the situation advised that the dogs would have to be turned over to the CDC and culled. I focused on the dogs' medical care and fostering. I sought outside counsel who would take immediate legal action against the CDC, because timely injunctive relief was the only way to save the dogs' lives, and there was no time to lose. Had I not done so, those dogs would be dead today. It was Ms. Dworniczek, not I, who eagerly sought out and enjoyed time in front of the press concerning those dogs.

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### **The Rescue's Proposed Alternate Fosters Are Not Suitable for These Dogs**

16. The Response identifies a list of individuals the Rescue says can foster the dogs currently in my care, including the medically fragile dogs. Based on my personal knowledge of these dogs and these placements, the proposed alternatives are not suitable substitutes for the continuity of care these animals require.
17. Aimee Look and Scott Loeff previously fostered Caleb, a paralyzed dog. They were frightened of him, and they reported that he tried to bite when they attempted to change his diaper or place him in his cart. Caleb was returned to me, and in my care he has not exhibited that aggressive behavior a single time. The same fosters also cared for Elle, a paralyzed dog, who did not do well in their home. Elle repeatedly developed urinary tract infections that progressed to bladder stones, and she developed sores from wearing a diaper around the clock. Their home is not a suitable placement for a young, wheelchair-bound dog like Russell, whose needs are different.
18. Elizabeth W. fosters senior dogs and has consistently agreed to take only dogs with senior-level energy.
19. As to Moon Dog Farm, I was informed by another rescue that Moon Dog Farm primarily takes in guinea pigs and rabbits and that other rescues decline to place dogs there. It is not an appropriate placement for the dogs in our care.
20. These are the very dogs whose continuity of care this Court found weighs in favor of preserving the status quo. Dispersing them to the placements the Rescue proposes would put medically fragile animals at risk.

### **The Care of Paralyzed Dogs**

21. Russell is a young dog in the Rescue's care who is paralyzed as a result of intervertebral disc disease. I have cared for paralyzed dogs for approximately eighteen years. A paralyzed dog has no use of his hind legs, and when he is not in his wheelchair he moves by pulling himself forward with his front legs. Russell dragging himself across his pen is the normal way a paralyzed dog moves when he is out of his cart; it is not a sign of neglect, illness, or distress, and anyone experienced with such dogs would recognize it as ordinary. The daily care these dogs require, including bladder expression, monitoring for pressure sores, diaper changes, and physical therapy, is care I personally provide and was trained to provide by the dogs' treating veterinarians.

### **Tulip's Cancer and the Cancelled Surgery**

22. Tulip is a five-year-old French Bulldog in the Rescue's care. She was diagnosed with thyroid tumors that I was informed are cancerous. Because of where the tumors are located, she cannot wear a collar or harness, which makes safely handling and transporting her especially difficult. Tulip's treating veterinarian, Dr. Lynn Trudeau, and the oncologist and radiologist with whom I spoke on June 9, 2026, both recommended that the tumors be surgically removed promptly, before they could spread. Her treating hospital, VCA Aurora Animal Hospital, prepared a written treatment plan for the surgery, a thyroidectomy with histopathology, specialist-administered anesthesia, and several days of hospitalization, dated June 5, 2026 (Treatment Plan No. 775283298) and estimated at \$11,359.55 to \$13,063.48, requiring a deposit of \$8,519.66. A true and correct copy of that treatment plan is attached as Exhibit D. The surgery was scheduled for June 11, 2026. On June 10, 2026, the night before, the Board cancelled it. The veterinarian who had been treating Tulip was not consulted about the cancellation. The replacement debit card the Board provided after this Court's May 21 Order carries a limit of

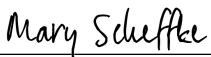
\$1,000, which cannot cover even the \$8,519.66 deposit the surgery requires, let alone its full cost. As of the date of this declaration, Tulip has not received the surgery her veterinarians recommended.

**Ms. McElligott Is Not a Suitable Foster for Tulip**

23. Defendants’ own filings state that Ms. McElligott would foster Tulip. Based on my personal knowledge of Ms. McElligott and her dogs, she is not a suitable caregiver for a medically fragile dog with cancer like Tulip. Ms. McElligott adopted a dog named Luna, whom she calls “Luni,” because Luna is wild and out of control. I have observed that Ms. McElligott does not have much control over her dogs and resorts to screaming at them, and that she has crated Luna and another of her dogs, Quigley, for hours at a time because they were too much for her to manage. Luna is not trained or under Ms. McElligott’s control, and Luna’s energy would be too much for Tulip, a sick dog who needs calm, careful handling. What is more, Tulip cannot wear a collar or harness because of her tumors. I am not aware that Ms. McElligott has ever cared for a dog that underwent back surgery, and I do not recall her ever having a dog with IVDD. Ms. McElligott also works, is caring for a husband, and has no backyard, and it is unclear to me how she would transport Tulip to the frequent veterinary appointments her recovery would require.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

Signed by:



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Mary Catherine Scheffke

Dated: 6/11/2026, 2026

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