

CR19-1821A  
DC-09560009031-005  
STATE VS. MICHAEL DURAND SCH 8 Pages  
District Court 08/28/2019 05:00 PM  
Washoe County 1795  
SHIGGTR

DA #17-13644  
WCAC A17-207847

CODE 1795  
Christopher J. Hicks  
#7747  
One South Sierra Street  
Reno, NV 89501  
(775) 328-3200

**FILED**

**AUG 28 2019**

JACQUELINE BRYANT, CLERK  
By: *M. Conway*  
DEPUTY CLERK

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IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA,  
IN AND FOR THE COUNTY OF WASHOE

\* \* \*

THE STATE OF NEVADA,  
Plaintiff,

Case No.: CR 19-1821 A  
Dept. No.: 9

v.  
MICHAEL DURAND SCHNEIDER (A)  
and  
LEILANI TAU-SCHNEIDER, (B)  
Defendants.

INDICTMENT

The defendants, MICHAEL DURAND SCHNEIDER, and LEILANI TAU-SCHNEIDER, are accused by the Grand Jury of Washoe County, State of Nevada, of the following:

COUNT I. PRACTICING VETERINARY MEDICINE WITHOUT A LICENSE,  
a violation of NRS 638.090, NRS 638.170(2), and NRS 195.020, a  
category D felony, <sup>52176</sup>~~(01454)~~ in the manner following, to wit:

That the said defendants, MICHAEL DURAND SCHNEIDER and LEILANI TAU-SCHNEIDER, acting individually and/or in joint participation and/or as abettors with one another, between May and October, 2017, at Reno Township, within the County of Washoe, State

1 of Nevada, did willfully and unlawfully practice veterinary medicine  
2 without a license at "PUPPIES PLUS, INC", located at 6405 South  
3 Virginia Street, said defendants being responsible under one or more  
4 of the following theories of the offense: (1) the defendants did  
5 directly commit the said act; and/or (2) the defendants did aid or  
6 abet another in the commission of the crime with the intent that the  
7 crime be committed by directly or indirectly counseling, encouraging,  
8 commanding, inducing, or otherwise procuring another to commit the  
9 crime; and/or (3) pursuant to a conspiracy to commit this crime, with  
10 the intent that this crime be committed, the defendants conspired to  
11 commit the crime, to wit:

12 the defendants injected fluid underneath the skins of  
13 various dogs at "PUPPIES PLUS, INC", located at 6405 South Virginia  
14 Street, which conduct constituted the practice of veterinary  
15 medicine;

16 AND/OR

17 That the said defendants did, acting individually and/or in  
18 joint participation, aid, abet, counsel, encourage, hire, command,  
19 induce or otherwise procure an associate, agent, or employee of  
20 "PUPPIES PLUS, INC" to commit the aforementioned act, to wit: the  
21 defendants, as co-owners of "PUPPIES PLUS, INC", trained and  
22 instructed their employees to routinely inject fluid under the skins  
23 of dogs as course of treatment for real or perceived illnesses,  
24 without having instruction from a licensed veterinarian, and provided  
25 the equipment and refills of fluid needed to perform said injections.

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1                    COUNT II. PRACTICING VETERINARY MEDICINE WITHOUT A  
2 LICENSE, a violation of NRS 638.090, NRS 638.170(2), and NRS 195.020,  
3 a category D felony, (<sup>52176</sup>~~01454~~) in the manner following, to wit:

4                    That the said defendants, MICHAEL DURAND SCHNEIDER and  
5 LEILANI TAU-SCHNEIDER, acting individually and/or in joint  
6 participation and/or as abettors with one another, between May and  
7 October, 2017, at Reno Township, within the County of Washoe, State  
8 of Nevada, did willfully and unlawfully practice veterinary medicine  
9 without a license at "PUPPIES PLUS, INC", located at 6405 South  
10 Virginia Street, said defendants being responsible under one or more  
11 of the following theories of the offense: (1) the defendants did  
12 directly commit the said act; and/or (2) the defendants did aid or  
13 abet another in the commission of the crime with the intent that the  
14 crime be committed by directly or indirectly counseling, encouraging,  
15 commanding, inducing, or otherwise procuring another to commit the  
16 crime; and/or (3) pursuant to a conspiracy to commit this crime, with  
17 the intent that this crime be committed, the defendants conspired to  
18 commit the crime, to wit:

19                    the defendants administered Doxycycline, AND/OR  
20 Tetracycline, AND/OR Clavamox, AND/OR other antimicrobial drugs via  
21 atomization and inhalation in sealed storage containers to various  
22 dogs at "PUPPIES PLUS, INC", located at 6405 South Virginia Street,  
23 which conduct constituted the practice of veterinary medicine;  
24 AND/OR

25                    That the said defendants did, acting individually and/or in  
26 joint participation, aid, abet, counsel, encourage, hire, command,

1 induce or otherwise procure an associate, agent, or employee of  
2 "PUPPIES PLUS, INC" to commit the aforementioned act, to wit: the  
3 defendants, as co-owners of "PUPPIES PLUS, INC", trained and  
4 instructed their employees to routinely place dogs in sealed storage  
5 containers which were then filled with atomized medication which was  
6 designed to be inhaled by the dogs as course of treatment for real or  
7 perceived illnesses, without having instruction from a licensed  
8 veterinarian, and provided the equipment and refills of medication  
9 needed to perform said procedure.

10 COUNT III. PRACTICING VETERINARY MEDICINE WITHOUT A  
11 LICENSE, a violation of NRS 638.090 and NRS 638.170(2), a category D  
12 felony, (~~01454~~<sup>52176</sup>) in the manner following, to wit:

13 That the said defendant, MICHAEL DURAND SCHNEIDER, between  
14 May and October, 2017, at Reno Township, within the County of Washoe,  
15 State of Nevada, did willfully and unlawfully practice veterinary  
16 medicine without a license, to wit: the defendant prescribed AND/OR  
17 provided Doxycycline pills, AND/OR other antimicrobial drugs to  
18 Ashley Perez for the treatment of her dog, which conduct constituted  
19 the practice of veterinary medicine.

20 COUNT IV. PRACTICING VETERINARY MEDICINE WITHOUT A  
21 LICENSE, a violation of NRS 638.090, NRS 638.170(2), and NRS 195.020,  
22 a category D felony, (~~01454~~<sup>52176</sup>) in the manner following, to wit:

23 That the said defendant, MICHAEL DURAND SCHNEIDER, between  
24 May and October, 2017, at Reno Township, within the County of Washoe,  
25 State of Nevada, did willfully and unlawfully practice veterinary  
26 medicine without a license, to wit: the defendant administered

1 zoonotic disease vaccinations, namely, rabies vaccinations, to  
2 various dogs at "PUPPIES PLUS, INC", located at 6405 South Virginia  
3 Street, which conduct constituted the practice of veterinary  
4 medicine;

5 AND/OR

6 . That the said defendant, MICHAEL DURAND SCHNEIDER, did aid,  
7 abet, counsel, encourage, hire, command, induce or otherwise procure  
8 an associate, agent, or employee of "PUPPIES PLUS, INC" to commit the  
9 aforementioned act, to wit: the defendant, as an owner of "PUPPIES  
10 PLUS, INC", trained and instructed his employee, namely, Ashley  
11 Perez, to administer rabies vaccinations to various dogs located at  
12 "PUPPIES PLUS, INC" and to complete the required paperwork, all  
13 without a licensed veterinarian present.

14 COUNT V. PRACTICING VETERINARY MEDICINE WITHOUT A LICENSE,  
15 a violation of NRS 638.090 and NRS 638.170(2) a category D felony,  
16 <sup>52176</sup>  
~~(01451)~~ in the manner following, to wit:

17 That the said defendant, LEILANI TAU-SCHNEIDER, between May  
18 and October, 2017, at Reno Township, within the County of Washoe,  
19 State of Nevada, did willfully and unlawfully practice veterinary  
20 medicine without a license, to wit: the defendant recommended a  
21 course of treatment for a sick "Cocker Spaniel" breed dog to her  
22 employees at "PUPPIES PLUS, INC", located at 6405 South Virginia  
23 Street, whereby the defendant recommended that the sick "Cocker  
24 Spaniel" be given fluid injections AND/OR breathing treatments AND/OR  
25 be force-fed food, which conduct constituted the practice of  
26 veterinary medicine.

1           COUNT VI. TORTURING AND/OR KILLING AN ANIMAL, a violation  
2 of NRS 574.100(1), NRS 574.100(6) (a) and NRS 195.020, a category D  
3 felony, (55977) in the manner following, to wit:

4           That the said defendant, LEILANI TAU-SCHNEIDER, between the  
5 1st and 30th day of September, 2017, at Reno Township, within the  
6 County of Washoe, State of Nevada, did willfully, unlawfully, and  
7 maliciously, torture and/or kill a "Cocker Spaniel" breed dog at or  
8 near "PUPPIES PLUS, INC", located at 6405 South Virginia Street, in  
9 the manner following, to wit: by refusing and/or withholding  
10 necessary veterinary care to a sick "Cocker Spaniel" breed dog, which  
11 conduct caused said dog to experience unjustifiable physical pain  
12 and/or suffering, and/or caused the death of said dog;

13 AND/OR

14           That the said defendant did aid, abet, counsel, encourage,  
15 hire, command, induce or otherwise procure an associate, agent, or  
16 employee of "PUPPIES PLUS, INC" to commit the aforementioned act, all  
17 of which caused said dog unjustifiable physical pain and suffering,  
18 and/or caused the death of said dog, to wit: the defendant, as an  
19 owner of "PUPPIES PLUS, INC", instructed her employees how to care  
20 for a seriously ill "Cocker Spaniel" breed dog in that LEILANI TAU-  
21 SCHNEIDER instructed her employees not to take the sick dog to a  
22 licensed veterinarian, but to instead force-feed the sick dog and  
23 inject it with fluid, and to feed it Karo syrup, all of which did not  
24 cure the dog, who died shortly thereafter.

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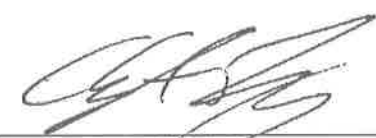
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AFFIRMATION PURSUANT TO NRS 239B.030

The undersigned does hereby affirm that the preceding document does not contain the social security number of any person.

Dated this 28th day of August, <sup>28<sup>th</sup> 2019</sup> 2019. *CV*

CHRISTOPHER J. HICKS  
District Attorney

By   
CHRISTOPHER DAY  
DEPUTY DISTRICT ATTORNEY

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1           The following are the names of witnesses examined before  
2 the Grand Jury:

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5 ASHLEY PEREZ  
6 ~~JEFF BROOKS~~ *J.Y.C.P.*  
7 CASANDRA SCANNELL  
8 JESSICA SLATIN, DVM  
9 JENNIFER PEDIGO

10 "A TRUE BILL"

11 *Linda R. Nixon*  
12 \_\_\_\_\_  
13 FOREPERSON

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15 "NO TRUE BILL"

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18 FOREPERSON

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