

April 25, 2025

USDA APHIS Animal Care
2150 Centre Ave.
Building B, Mailstop 3W11
Fort Collins, Colorado 80526
Via Email: ac.complaints@usda.gov

**RE: Formal Complaint Requesting Investigation into Ridglan Farms'
Classification of Dogs Under the Animal Welfare Act**

To whom it may concern:

Rise for Animals and The Marty Project respectfully submit this formal complaint urging the United States Department of Agriculture ("USDA") to initiate an investigation into Ridglan Farms ("Ridglan"), a USDA-licensed facility operating under both a Class A breeder/dealer license (35-A-0009) and a Class R research registration (35-R-0004). Available evidence – including public testimony and USDA inspection records – suggests that Ridglan may be violating Animal Welfare Act ("AWA") regulations by misclassifying its canine population, thereby undermining federal oversight and evading legal obligations.

On April 22, 2025, Ridglan's lead veterinarian, Dr. Richard Van Domelen, publicly declared before the Wisconsin Veterinary Examining Board ("VEB") that he considers *all* of Ridglan's dogs to be "research animals" – regardless of whether any individual dog is enrolled in an active study. This sweeping statement not only reflects a misunderstanding of federal classifications but also appears to reveal a noncompliant institutional policy at Ridglan – one that fails to distinguish between animals held under its USDA Class A license and those under its USDA Class R registration.

USDA records from 2014 through 2025 clearly document divergent canine population counts under Ridglan's two regulatory designations. Inspections of its Class A operations record an average dog population of approximately 2,450, while inspections of its Class R facilities reflect an average of fewer than 150 dogs. Most recently, on January 22, 2025, the USDA documented 2,639 dogs under Ridglan's Class A license and *only* 284 dogs under its Class R registration. These data indicate that Ridglan itself has historically designated – and continues presently to designate – the overwhelming majority of its dogs as non-research animals, directly contradicting Dr. Van Domelen's statement to the VEB.

AWA regulations are designed to prevent regulatory arbitrage between breeder and researcher designations, and they prohibit the generic or wholesale designation of animals as “research” based on mere internal preference or operational convenience. Animals may be designated as research animals *only if* they are actually involved in research activities that are properly documented and reported. See 9 C.F.R. § 2.36(b)(4)-(8). Further, dual-status facilities like Ridgland must maintain distinct and accurate records for animals held under each license or registration. See 9 C.F.R. §§ 2.35, 2.75.

Ridgland’s reported policy of classifying all dogs as “research animals” regardless of their use – and in contradiction of USDA records – violates these regulatory provisions and raises multiple concerns:

- Misuse of Licensure and Systemic Underreporting: By representing all of its dogs as “research animals” to state authorities while reporting the vast majority of those same dogs to the USDA under a Class A breeder license, Ridgland may be misusing its dual licensure to avoid stricter oversight. This is contrary to the regulatory structure, which requires that each dog be properly categorized and tracked under their appropriate designation and clearly mandates that animals only be classified as “research” animals if they are part of a legitimate, documented research protocol approved by an Institutional Animal Care and Use Committee (“IACUC”). See 9 C.F.R. §§ 2.35-2.36, 2.38(g), 2.50-2.51, 2.75(a). Dr. Van Domelen’s public statement appears to concede Ridgland’s failure to observe this standard and suggests an improper attempt to evade Class A requirements by mischaracterizing its breeding or dealing dogs as “research” dogs.
- Regulatory Evasion and Potential Criminal Liability: Ridgland’s contradictory representations to federal and state authorities appear intended to shield the facility from liability under Wisconsin’s animal cruelty law, which does *not* apply to research or “related incidental animal care” conducted at a federally-regulated research facility like Ridgland. See Wisconsin Statutes §§ 951.02, § 951.015(3). By declaring that all of its dogs are “research” animals, Ridgland may be attempting to retroactively invoke this exemption for procedures performed outside of approved protocols. This perceived tactic represents an improper effort to shield the facility from state-level accountability, as federal regulations do not permit research designations for animals held for breeding, sale, or non-research purposes.
- Violation of Federal Recordkeeping and Reporting Requirements: If Ridgland failed to report all internally classified “research” dogs to the USDA, the facility may be guilty of material misrepresentation and failure to comply with federal recordkeeping obligations. Federal regulations require that USDA licensees and registrants maintain complete and accurate records of all animals *and* prohibit the

falsification or omission of information to federal regulators. See, e.g., 9 C.F.R. § 2.35, 2.4.

In light of the foregoing, we respectfully request that the USDA:

- Initiate an investigation into Ridglan Farms' compliance with AWA regulations, including whether it has used its Class A license to house unreported research animals in violation of federal regulations;
- Audit Ridglan's internal records, including veterinary files, IACUC documentation, animal identification logs, and animal classification procedures, to determine the actual status and use of animals under each regulatory designation; and
- Evaluate and take appropriate enforcement action, including, as warranted, issuing civil penalties for regulatory violations, suspending or revoking Ridglan's license or registration, and referring to relevant state authorities if misclassification is confirmed. See §§ 9 CFR 2.3, 2.4, 2.11, 2.35, 2.75.

AWA regulations require the transparent and accurate classification, licensing or registration, and reporting of animal use. Based on Dr. Van Domelen's public statement, Ridglan appears to have adopted a posture that deliberately undermines these principles, and we urge the USDA to act swiftly to uphold the law and ensure accountability.

For the animals,



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