Rise for Animals.

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October 7, 2025

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

RE: **Request for Coordinated Investigation and Appropriate Enforcement Action Concerning Ridglan Farms**

To whom it may concern:

Rise for Animals and The Marty Project respectfully submit this request urging the United States Department of Agriculture ("USDA") to initiate coordinated investigative and, as warranted, enforcement action against Ridglan Farms ("Ridglan"), a USDA-licensed Class A breeder (35-A-0009) and USDA-registered Class R research facility (35-R-0004).

This request follows the USDA's receipt of our two previous formal complaints (AC25-0596, dated April 25, 2025, and AC25-1167, dated September 16, 2025) and is supported by new and compelling state findings demonstrating that Ridglan's lead veterinarian — and, on information and belief, its attending veterinarian for both its Class A license and Class R registration — Dr. Richard Van Domelen (Wisconsin license number 404991) has engaged in long-term veterinary malpractice and unprofessional conduct. These findings, issued by Wisconsin's Veterinary Examining Board ("VEB"), indicate that the animals held at Ridglan — who are subject to USDA licensure and registration — remain under the care and control of a veterinarian summarily suspended for sustained unprofessional conduct and, thereby, face an ongoing and serious risk of suffering illegal harm.

On September 30, 2025, the VEB entered an Order of Summary Suspension against Dr. Van Domelen, finding that he has — since 2008 — engaged in routine and serious violations of state regulations. Namely, the VEB determined that Dr. Van Domelen engaged in medically unnecessary and improperly executed surgical procedures; improperly delegated surgical and dental procedures to unqualified personnel; failed to use anesthesia or pain control before/during/after surgical procedures; and maintained inadequate medical records.

(Regardless of which individual is formally designated as Ridglan's attending veterinarian for purposes of USDA licensure or registration, Ridglan must maintain compliant,

attending-veterinarian-led programs of adequate veterinary care under 9 C.F.R. § 2.40 (Class A) and 9 C.F.R. § 2.33 (Class R). To the extent Dr. Van Domelen has served or currently serves as Ridglan's attending veterinarian, the VEB's findings bear directly on whether those federally required, attending-veterinarian-led programs are compliant.)

The VEB's conclusions of law — which the VEB determined to "imperatively require[] emergency suspension" of Dr. Van Domelen's veterinary license to protect "public health, safety and welfare" — include the following:

- "Since at least 2008," Dr. Van Domelen "inappropriately delegated veterinary medical acts to individuals without the required license, education, training, and experience, as prohibited by § VE 1.44(1)(a)."

- "Since at least 2008," Dr. Van Domelen "inappropriately delegated surgical procedures to veterinary technician [sic] and other persons not holding the required license as prohibited by § VE 1.44(2)(c)."

- "Since at least 2008," Dr. Van Domelen "inappropriately delegated dental extractions to a person not holding the required license or certification as prohibited by § VE 1.44(2)(c)2.a."

- "Since at least 2008," Dr. Van Domelen "engaged in unprofessional conduct, as defined by § VE 1.58(2): *Conduct in the practice of veterinary medicine which evidences a lack of knowledge or ability to apply professional principles or skills*."

- "Since at least 2008," Dr. Van Domelen "engaged in unprofessional conduct, as defined by § VE 1.58(4): *Gross, serious, or grave negligence, as compared to less serious or more ordinary acts of negligence, in the practice of veterinary medicine*."

- "Since at least 2008," Dr. Van Domelen "violated and aided and abetted in violations substantially related to the practice of veterinary medicine, defined by § VE 1.58(7): *Violating or aiding and abetting the violation of any law or administrative rule or regulation substantially related to the practice of veterinary medicine*."

- "Between February 7, 2022, and February 6, 2025," Dr. Van Domelen "engaged in unprofessional conduct, defined by Wis. Admin. Code § VE 1.58(19): *Failure to maintain records as required by s. VE 1.52*."

- "On and between approximately March 12, 2025 and September 8, 2025," Dr. Van Domelen "engaged in unprofessional conduct as defined by Wis. Admin. Code. § VE 1.58(19): *Failure to maintain records as required by s. VE 1.52*."

- "On and between approximately March 12, 2025 and September 8, 2025," Dr. Van Domelen "engaged in unprofessional conduct, defined by Wis. Stat. § 89.07(1)(h): *In this section, 'unprofessional conduct' includes, but is not limited to (h): Violating any order of the examining board.* This relates to Respondent violating the Board Order requiring that medical records be kept in accordance with Wis. Admin. Code § VE 1.52."

- "On and between approximately March 12, 2025 and September 8, 2025," Dr. Van Domelen "engaged in unprofessional conduct, defined by Wis. Stat. § 89.07(1)(h): *In this section, 'unprofessional conduct' includes, but is not limited to (h): Violating any order of the examining board.* This relates to Respondent failing to perform a thorough exam to establish a risk analysis and to establish an appropriate analgesic and anesthetic protocol prior to performing dental extractions, ovariohysterectomies, and orchiectomies. This relates to Respondent failing to perform nictitans gland prolapse repair surgeries only when medically indicated with such necessity documented in the medical records. This relates to Respondent failing to include anesthesia monitoring in surgical records."

The VEB's findings — as well as those previously rendered by the Wisconsin Department of Agriculture, Trade, and Consumer Protection ("DATCP") — bear directly on Ridglan's compliance with the Animal Welfare Act ("AWA") and its implementing regulations and, in so doing, support the termination of its Class A license.

The USDA may terminate an existing Class A license "at any time for any reason that a license application may be denied pursuant to" 9 C.F.R. § 2.11(a), following notice and opportunity for a hearing. 9 C.F.R. § 2.12. Denial standards include, among others, that an applicant:

- "Is or would be operating in violation or circumvention of any Federal, State, or local laws;"

- "Is not in compliance with the [AWA] or any of [its] regulations or standards;"

- "[H]as been found to have violated any Federal, State, or local laws or regulations pertaining to the transportation, ownership, neglect, or welfare of animals;" and/or

- "[I]s otherwise unfit to be licensed…"

9 C.F.R. §§ 2.11(a)(2), 2.11(a)(6), 2.11(a)(7).

On the present record — as established by State findings — Ridglan satisfies multiple 9 C.F.R. § 2.11(a) grounds for denial, and its license should be terminated under 9 C.F.R. § 2.12.

State findings evidence that Ridglan is operating in violation of state laws, as contemplated by 9 C.F.R. § 2.11(a)(6), and in violation of state regulations pertaining to neglect and welfare of animals, as contemplated by 9 C.F.R. § 2.11(a)(7).

In our September 16, 2025, complaint, we provided DATCP's findings that Ridglan has, on at least 308 separate occasions, violated Wis. Admin. Code § ATCP 16.20(2)(a) by "failing to handle a dog as carefully as practicable and in a humane manner that does not cause physical harm or unnecessary injury" and has, on at least three separate occasions, violated Wis. Admin. Code § ATCP 16.20(2)(b) by "fail[ing] to provide daily body, mobility, and behavior check of a dog."

On September 30, 2025, and as outlined above, the VEB concluded that Ridglan's lead (and, on information and belief, attending) veterinarian, Dr. Van Domelen, has repeatedly, and over a period spanning almost twenty years, violated numerous provisions of Wis. Admin. Code ch. VE 1.

State findings evidence that Ridglan is not in compliance with the AWA and associated regulations, as contemplated by 9 C.F.R. § 2.11(a)(2), and has violated federal regulations pertaining to the neglect and welfare of animals, as contemplated by 9 C.F.R. § 2.11(a)(7).

DATCP has determined that:

- Between February 7, 2022 and February 22, 2025, Ridglan committed at least 308 violations of Wis. Admin. Code § ATCP 16.20(2)(a) by "failing to handle a dog as carefully as practicable and in a humane manner that does not cause physical harm or unnecessary injury." These DATCP findings are probative of noncompliance with the corresponding federal standard, 9 C.F.R. § 2.131(b)(1), which requires that animals be handled carefully, expeditiously, and "in a manner that does not cause trauma, overheating, excessive cooling, behavioral stress, physical harm, or unnecessary discomfort." Additional context provided by DATCP also supports determinations of noncompliance with other federal regulations, including 9 C.F.R. § 2.40(b)(1) (requiring the availability of appropriate personnel); 9 C.F.R. § 2.40(b)(2) (requiring the use of "appropriate methods to prevent, control, diagnose, and treat diseases and injuries"); 9 C.F.R. § 2.40(b)(4) (requiring adequate guidance for personnel "involved in the care and use of animals regarding handling . . . anesthesia, analgesia"); and 9 C.F.R. § 2.40(b)(5) (requiring "[a]dequate pre-procedural and post-procedural care in accordance with established veterinary medical and nursing procedures").

- On June 6, 2024, and September 16, 2024, Ridglan committed a combined three violations of Wis. Admin. Code § ATCP 16.20(2)(b) by "fail[ing] to provide daily body, mobility, and behavior check of a dog." These DATCP findings are probative of noncompliance with the corresponding federal standard, 9 C.F.R. §

2.40(b)(3), which requires that animals be observed daily "to assess their health and well-being."

The VEB, as codified in its Order of Summary Suspension on September 30, 2025, drew the following legal conclusions about Dr. Van Domelen:

- Dr. Van Domelen (i) is unfit to practice veterinary medicine, (ii) engaged in gross, serious, or grave acts of negligence, and (iii) improperly delegated veterinary matters to unqualified staff. These VEB findings are probative of noncompliance with the federal requirement that a Class A licensee ensure the "availability of appropriate . . . personnel." 9 C.F.R. § 2.40(b)(1). Additionally, to the extent that Dr. Van Domelent has served or is currently serving as Ridglan's attending veterinarian for purposes of its Class A license, these VEB findings are probative of noncompliance with the federal requirement that a Class A licensee "have an attending veterinarian who shall provide adequate veterinary care to its animals…." 9 C.F.R. § 2.40(a).

- Dr. Van Domelen both performed unnecessary surgical procedures *and* performed surgical procedures inappropriately. These VEB findings are probative of noncompliance with the federal requirements that a Class A licensee "use [] appropriate methods to prevent, control, diagnose, and treat diseases and injuries…." 9 C.F.R. §§ 2.40(b)(2). Additionally, to the extent that Dr. Van Domelent has served or is currently serving as Ridglan's attending veterinarian for purposes of its Class A license, these VEB findings are probative of noncompliance with the federal requirement that a Class A licensee "have an attending veterinarian who shall provide adequate veterinary care to its animals…." 9 C.F.R. § 2.40(a).

- Dr. Van Domelen (i) delegated improper surgical procedures to other staff and (ii) aided and abetted violations of applicable rules. These VEB findings are probative of noncompliance with the federal requirements that Class A licensees "use [] appropriate methods to prevent, control, diagnose, and treat diseases and injuries…." and provide "[a]dequate guidance to personnel involved in the care and use of animals regarding handling, immobilization, anesthesia, analgesia, tranquilization, and euthanasia." 9 C.F.R. §§ 2.40(b)(2), 2.40(b)(4). Additionally, to the extent that Dr. Van Domelent has served or is currently serving as Ridglan's attending veterinarian for purposes of its Class A license, these VEB findings are probative of noncompliance with the federal requirement that a Class A licensee "have an attending veterinarian who shall provide adequate veterinary care to its animals…." 9 C.F.R. § 2.40(a).

- Dr. Van Domelen failed to establish an appropriate analgesic and anesthetic protocol prior to performing surgical and dental procedures. These VEB findings are probative of noncompliance with the federal requirement that Class A

licensees maintain "[a]dequate pre-procedural and post-procedural care in accordance with established veterinary medical and nursing procedures." 9 C.F.R. § 2.40(b)(5). Additionally, to the extent that Dr. Van Domelent has served or is currently serving as Ridglan's attending veterinarian for purposes of its Class A license, these VEB findings are probative of noncompliance with the federal requirement that a Class A licensee "have an attending veterinarian who shall provide adequate veterinary care to its animals…." 9 C.F.R. § 2.40(a).

- Dr. Van Domelen failed to (i) adequately document medical necessity for surgical procedures and (ii) adequately document surgical procedures. These VEB findings are probative of noncompliance with the federal requirement that Class A licensees "keep copies of medical records for dogs" that include "the date and a description of" any problem ("such as a disease, injury or illness") "identified," "examination findings, test results, plans for treatment and care, and treatment procedures performed, where appropriate." 9 C.F.R. § 3.13(b)(2); *see also* 9 C.F.R. § 2.40(b)(5) (requiring adequate pre- and post-procedural care).

These State determinations — spanning multiple years and regulatory bodies — reflect a sustained, systemic pattern of conduct by Ridglan's lead (and, on information and belief, attending) veterinarian. Additionally, they together evidence an overall failure on Ridglan's behalf to "provide adequate veterinary care," as required by federal regulation. 9 C.F.R. § 2.40; *see* United States Department of Agriculture. *Animal Welfare Inspection Guide*. Washington, D.C.: U.S. Department of Agriculture, 2025, at 6.4.2 (explaining that the "purpose of requiring a program of adequate veterinary care is to ensure that facilities attend to the health needs of animals"); United States Department of Agriculture. *Animal Welfare Inspection Guide*. Washington, D.C.: U.S. Department of Agriculture, 2025, at 6.4.6 (explaining that, "[i]f surgeries and/or specialized surgical procedures are performed at a licensed facility," those procedures must be "conducted consistent with standard veterinary practice").

Further, to the extent that Dr. Van Domelen has served or currently serves as Ridglan's attending veterinarian in connection with its Class R research registration (35-R-0004), the VEB and DATCP findings underscore the need for the USDA to assess Ridglan's compliance with 9 C.F.R. § 2.33, which similarly contemplates the provision of "adequate veterinary care" by "an attending veterinarian," as well as the establishment and maintenance of "programs of adequate veterinary care." *See* 9 C.F.R. §§ 2.33(a), 2.33(b) (setting forth the following requirements for Class R registrants: "(1) The availability of appropriate facilities, personnel, equipment, and services to comply with the provisions of this subchapter; (2) The use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and the availability of emergency, weekend, and holiday care; (3) Daily observation of all animals to assess their health and well-being; . . . (4) Guidance to principal investigators and other personnel involved in the care and use of animals regarding handling, immobilization, anesthesia, analgesia, tranquilization, and euthanasia; and (5) Adequate pre-procedural and post-procedural care in accordance with established veterinary medical and nursing procedures.")

State findings and Ridglan's associated statements and decisions evidence that Ridglan is "otherwise unfit to be licensed" within the meaning of 9 C.F.R. § 2.11(a)(7).

The USDA has terminated AWA licenses under 9 C.F.R. § 2.12 based on 9 C.F.R. § 2.11(a) grounds where the record showed violations of state animal welfare laws. *See, e.g.*, In re Carrie Leo (USDA ALJ) (granting summary judgment and terminating AWA license under 9 C.F.R. §§ 2.11(a)(5), (6), and 2.12). Such precedent confirms that state law noncompliance can underpin a finding of unfitness and serve as a proper basis for license termination — and the VEB's and DATCP's findings here support the same conclusion and result.

A determination of Ridglan's unfitness is further supported by Dr. Van Domelen's and Ridglan's own actions. At the September 30, 2025, hearing before the VEB, Dr. Van Domelen effectively conceded the VEB's determination that he lacks "knowledge or ability to apply professional principles or skills," publicly analogizing his professional and regulatory noncompliance to a child struggling with math homework:

> *When helping your child with math homework, do you simply tell your child that the answer is wrong, do it again, repetitively? Or do you explain what the mistake was and how he or she should do it correctly? That's all I'm asking for today.*

Despite this public admission of professional ineptitude — and the VEB's summary suspension of Dr. Van Domelen's veterinary license on this and other grounds — Ridglan has stated that it will retain Dr. Van Domelen as its facility manager.

Dr. Van Domelen's admissions and Ridglan's decision to nevertheless retain him, together with the State's established record, support a finding that Ridglan is "unfit" to hold a Class A license, warranting termination of its license under 9 C.F.R. § 2.12 based on 9 C.F.R. § 2.11(a)(7).

On the basis of the foregoing, we respectfully request that the USDA:

- Coordinate immediately with DATCP and the VEB under 7 U.S.C. § 2145(b) to review and address the hundreds of regulatory violations documented by state authorities.

- Terminate Ridglan's Class A license (35-A-0009) under 9 C.F.R. § 2.12, based on the § 2.11(a)(2), (6), and (7) grounds for denial established by state findings.

- Investigate whether Ridglan's documented violations implicate its Class R registration (35-R-0004), and, if so, take appropriate enforcement action.

- Refer the matter to the Office of the General Counsel and Department of Justice for injunctive relief, consistent with the precedent set in *United States v. Envigo RMS, LLC* (W.D. Va. 2022).

Wisconsin's DATCP and VEB have established a pattern of long-standing and ongoing violations that demonstrate Ridglan's failure to comply with both state and federal requirements, and Ridglan's own statements and actions further betray its unfitness to hold USDA licensure. The record before both state and federal authorities reflects not merely procedural deficiencies but sustained noncompliance with professional, regulatory, and animal welfare standards. It follows that, under the AWA and its implementing regulations, termination of Ridglan's Class A license — and investigation into Ridglan's Class R registration — are not only authorized, but necessary, to prevent further unlawful animal harm and to preserve the integrity of federal enforcement and public confidence in USDA oversight.

For the animals,

Ed Butler, Executive Director
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Amy Van Aartsen, Executive Director
The Marty Project
amy@themartyproject.org

Attachment: Order for Summary Suspension - Order: 159333A, as issued by the Wisconsin Veterinary Examining Board in Case No. 24 VET 158 on September 30, 2025.

STATE OF WISCONSIN
BEFORE THE VETERINARY EXAMINING BOARD

IN THE MATTER OF THE PETITION FOR SUMMARY SUSPENSION OF THE VETERINARY LICENSE OF: RICHARD VANDOMELEN, D.V.M., RESPONDENT.	ORDER FOR SUMMARY SUSPENSION ORDER: 159333A

Wisconsin Veterinary Examining Board Case No. 24 VET 158

The State of Wisconsin, Veterinary Examining Board (Board), having reviewed the Petition Seeking Summary Suspension of Respondent's license, Affidavit in Support of Summary Suspension, Attachment A, all incorporated herein by reference, and it appearing based on the Petition and supporting documents that public health, safety, or welfare imperatively requires emergency action, makes the following Findings of Fact, Conclusions of Law, and Order of Summary Suspension.

PARTIES

1. The Veterinary Examining Board (Board), P.O. Box 8911, Madison Wisconsin, 53708-8911.

2. The Division of Animal Health (DAH), within the Department of Agriculture, Trade and Consumer Protection (Department), 2811 Agriculture Drive, Madison Wisconsin, 53718.

3. Dr. Richard J. VanDomelen, D.V.M. (Respondent), is licensed in the State of Wisconsin to practice veterinary medicine, practicing under license number 404991, current through December 31, 2025. The most recent address on file with Department for Respondent is 10489 W. Blue Mounds Road, Blue Mounds, WI 53517.

NOTICE

4. In accordance with Wis. Admin. Code § VE 3.62(1), on September 26, 2025 and September 30, 2025 Respondent was provided the Notice of Petition (Notice) and Petition Seeking Summary Suspension (Petition) via USPS mail, including the time and place when the Petition would be presented to the Board (September 30, 2025 at 11:30 a.m. via Microsoft Teams link provided). The notice provided on September 30, 2025 was an identical petition with the exception that the

September 30, 2025 petition was notarized, per Wis. Admin. Code § VE 3.56 (2). Per Wis. Admin. Code § VE 3.58, notice by mail is complete upon mailing. The Notice and Petition were also sent via email to Respondent and his legal counsel.

FINDINGS OF FACT

5. On December 5, 2024, the Board received a complaint against Respondent from Rebekah Robinson on behalf of Dane4Dogs, making several allegations against Respondent, all of which are detailed below.

6. As quoted directly from the complaint, the allegations included:

a. Wis. Stat. §§ 951.02 & 951.18 (felony mutilation of dogs by performing surgeries without anesthesia or veterinary supervision, either directly or vicariously through employees by aiding and abetting or conspiring with others to do so);
b. Wis. Admin. Code VE § 1.44 (improper delegation of surgical procedures to non-veterinary students and non-veterinary technicians); and
c. Wis. Stat. §§ 951.02 (misdemeanor intentional or negligent cruel treatment of animals by failing to examine and provide adequate health care for dogs);
d. Wis. Stat. § 951.14 (misdemeanor failure to provide proper shelter through proper ventilation, structural strength of enclosures, space provisions, and sanitation standards, either directly or vicariously through employees, or by aiding and abetting or conspiring with others to do so);
e. Wis. Admin. Code VE § 1.58 (gross negligence; committing crimes relating to veterinary practice; violating or aiding and abetting laws and regulations related to veterinary practice; and failing to keep veterinary facilities and equipment clean and sanitary).

7. The complaint consisted of 15 pages which fully detailed each of the above allegations. Additionally, there were 207 pages of exhibits submitted with the complaint.

8. On January 8, 2025, Compliance Officer Dustin Boyd (Boyd) and VEB Investigator Erin Carter (Carter) interviewed former Ridglan Farms employee Scott Gilbertson (Gilbertson).

a. Gilbertson was employed by Ridglan farms from approximately December 2021 to January 2022.
b. Gilbertson stated that on several occasions during his term of employment, he had provided assistance to co-worker Leah Staley

(Staley) who would perform "cherry eye" (nictitans gland prolapse) surgeries on dogs at Ridglan Farms.

c. Gilbertson described that he would hold the dog tight while Staley would cut the prolapsed eye gland with some scissors. Immediately upon the cut being made to the dog's eyelid, the dog would thrash about and make loud noises that Gilbertson described similar to a scream.
d. Gilbertson explained that there was never any type of anesthesia, pain medication, blood control, or after-care administered.
e. Gilbertson stated that the surgeries were performed cage-side, in a non-sterile environment. Upon completion of the surgery, he and/or Staley would put the dog back in its cage. Upon being back in its cage, the victim dog's cage-mate would usually immediately lick the blood off of the victim's face.
f. Neither Gilbertson nor Staley are licensed doctors of veterinary medicine (DVM) or certified veterinary technicians in the State of Wisconsin. Gilbertson was not provided any training regarding these surgeries.
g. Gilbertson stated there was no veterinarian supervision of these surgeries.
h. Gilbertson said that the cherry-eye are performed on almost a daily basis, but not quite every day. On the days those surgeries were performed, multiple dogs would be operated on at that day.
i. Gilbertson stated that the direction to perform these surgeries came from Respondent Dr. Rick VanDomelen to Staley, and then Staley would direct Gilbertson to help.
j. When asked if anyone at Ridglan Farms ever informed him that only a licensed veterinarian can perform these surgeries, Gilbertson responded that one time Staley casually mentioned that "technically a veterinarian is supposed to do this but we just perform them without a veterinarian", as she made an expression on her face.

9. On January 13, 2025, Boyd and Carter interviewed former Ridglan Farms employee Matthew Reich (Reich).

a. Reich was employed by Ridglan Farms approximately from January 2006 to August 2010.
b. Reich stated that Respondent Dr. Rick VanDomelen started employment at Ridglan Farms about a year and a half after Reich (approximately mid-2007).
c. Reich stated that on several occasions he had provided assistance to co-workers Jim Hiltbrand (Hiltbrand) and Al Olson (Olson) who would perform "cherry eye" surgeries on dogs.

d. Reich described that he would hold the dog with the dog's snout closed while Hiltbrand or Olson would use a tweezers to hold the prolapsed eye gland and then cut it with a pair of scissors. The eye would bleed profusely and the dog would immediately be put back into its kennel.
e. Reich explained that there was never any type of anesthesia, pain medication or blood control provided.
f. Reich explained that there was no standing practice to provide after-care to the dog.
g. Reich stated that the surgeries were performed cage-side, in a non-sterile environment. Upon completion of the surgery, he would put the dog back in its cage. Upon being back in its cage, the victim dog's cage-mate would usually immediately lick the blood off the victim's face.
h. Reich said that while there is a procedure/surgery room in one of the buildings, the room isn't often used other than to euthanize dogs.
i. Neither Reich, Olson, nor Hiltbrand are licensed or certified to practice veterinary medicine in the State of Wisconsin. Reich was not provided any training regarding these surgeries until the first occurrence when he was only shown how to hold the dog.
j. Reich stated there was no veterinarian supervision of these surgeries.
k. Reich said that on average, the above-described cherry-eye surgeries were performed about once per day. Some days there would be more, some days there would be none.
l. Reich stated that on several occasions he had provided assistance to co-workers Hiltbrand and Olson who would perform "de-vocalization" surgeries on dogs.
m. Reich described the process to start with Hiltbrand and Olson gathering about 30-40 dogs in a group outside of the kennels/cage-side. Hiltbrand or Olson would give each dog an injectable sedative, however the dogs appeared to be awake. Reich would support each dog while Hiltbrand and Olson performed the surgery. Hiltbrand or Olson would hold a light and operate a wedge or forceps. The other individual would go down the dog's throat with a scissors, clip the vocal cord, and then throw the vocal cord on the floor to later be washed away.
n. After the surgery, each dog would be put back into its kennel
o. Reich explained that there was never any type of pain medication provided.
p. Reich said that there was no follow-up or after-care provided to the dogs.

q. According to Reich, the de-vocalization surgeries occurred about twice per year.

10. On February 5, 2025, Carter and WDATCP employees Heidi Ulteig (Ulteig), Tyler Mortenson (Mortenson), Keri Schlimgen (Schlimgen), Julie Phillippi (Phillippi), and Dustin Boyd (Boyd) conducted an unannounced inspection and investigation at Ridglan Farms (Respondent's workplace).

11. During the February 5, 2025 inspection, Carter interviewed current Ridglan Farms employee Ethel "Em" Jenson (Jenson). Jenson was seen working in one of the buildings prior to the interview.

a. Jenson stated that she has assisted Heather Sutcliffe (Sutcliffe) and Olson with cherry-eye surgeries at Ridglan Farms.

12. During the February 5, 2025 inspection, Carter interviewed current Ridglan Farms employee Kurt Tollakson (Tollakson). Tollakson was seen working in one of the buildings prior to the interview.

a. Tollakson stated that he has heard about cherry-eye surgeries at Ridglan Farms. Tollakson explained that if he sees a dog with cherry-eye, he reports it.
b. Tollakson said that they did "de-barking" a long time ago, but not now.

13. During the February 5, 2025 inspection, Carter interviewed current Ridglan Farms employee Taylor Brown (Brown). Brown was seen working in one of the buildings prior to the interview.

a. Brown stated that she has assisted Georgia Heller (Heller) with cherry-eye surgeries at Ridglan Farms.
b. Brown stated that Sutcliffe also performs these surgeries. She stated that "guys in the breeding barn" assist with the surgeries, and described them as mid to older age.
c. Brown described the surgery to start with an eye drop, and then she would hold the dog's head so their face doesn't' move, the eye gland would be clamped, the gland would be cut with scissors, another eye drop would be applied, the eye could be held closed for 15-20 seconds, and then the dog is put back into the cage.
d. Brown said that there is no anesthetic, pain control, or after-care administered.
e. When asked about de-vocalization surgeries, Brown stated that she was not aware of any. However, Brown stated that she had heard dogs before with a hoarse-like bark (similar to how a de-

vocalized dog might sound), and that she could probably identify them if needed.

f. Brown also explained that she performs dentals at Ridglan Farms. As part of these duties, she explained she performs dental extractions as well.

14. During the February 5, 2025 inspection, Ulteig interviewed current Ridglan Farms employee Christopher Nachkash (Nachkash). Nachkash was seen working in one of the buildings prior to the interview.

a. Nachkash stated that he has assisted with cherry-eye surgeries at Ridglan Farms.
b. Nachkash explained that generally, he will hold the dog while Sutcliffe, Olson, or VanDomelen performs the surgery.
c. Nachkash explained that they put eye drops in to numb the eye, then the gland is held with a tweezers and then cut with scissors. It bleeds a little and then gauze or paper towel is used to stop the bleeding.
d. Nachkash explained that eye drops are used and if severe, a pain reliever pill called Rimadyl is administered.
e. Nachkash said that these surgeries are delegated by Sutcliffe or Respondent Dr. Rick VanDomelen.

15. During the February 5, 2025 inspection, Ulteig interviewed current Ridglan Farms employee Heather Sutcliffe (Sutcliffe). Sutcliffe was seen working in one of the buildings prior to the interview.

a. Sutcliffe stated that she has removed cherry-eyes on dogs at Ridglan Farms.
b. Sutcliffe explained that Olson and Heller also perform these surgeries.
c. Sutcliffe explained that staff will help to hold the dogs while the surgery is performed.
d. Sutcliffe said that numbing drops are used to the eye that surgery is being performed on. If a dog is squirmy, she will "knock that one out" with a combination mixture of Ketamine and "dexta-something". She will take the forceps, grab a hold of the eye gland, and then cut the eye gland with scissors.
e. Sutcliffe stated that the only anesthetic/pain control/after-care administered is a triple antibiotic eye ointment if it red afterwards.
f. Sutcliffe admitted that she has seen de-vocalization surgeries done at Ridglan Farms easily a hundred times, however it hasn't

been done for about 10 years. She stated that she might have helped with a few.

g. According to Sutcliffe, Hiltbrand performed the de-vocalization surgeries, but he is no longer employed by Ridglan Farms.
h. Sutcliffe explained that for de-vocalization surgeries, the dog would get put to sleep, laid on their belly, and then Hiltbrand would go in with a tool and cut the vocal cords.
i. Sutcliffe said that she doesn't remember what drugs/anesthetics/pain control was administered for the de-vocalization surgeries. She said she doesn't remember any after-care.
j. Sutcliffe stated that she performs the cherry-eye surgeries under the direction of Respondent Rick VanDomelen. She said that VanDomelen trained her how to perform the surgeries.

16. During the February 5, 2025 inspection, Ulteig interviewed current Ridglan Farms employee Shyanne Jentz (Jentz). Jentz was seen working in one of the buildings prior to the interview.

a. Jentz stated that she has assisted Sutcliffe perform cherry-eye surgeries at Ridglan Farms.
b. Jentz said that they would put drops on the eye to numb it. The eye gland would be grabbed with a tweezers and then it would be cut with surgical scissors. She would hold the dog outside of the kennel and then put it back in the kennel after the surgery.
c. Jentz stated that there are no drugs used for the surgery. If the eye seems irritated afterwards, they would use a triple antibiotic with steroids. She stated that she has never used pain medication.

17. During the February 5, 2025 inspection, Phillippi interviewed current Ridglan Farms employee Thomas Beam (Beam). Beam was seen working in one of the buildings prior to the interview.

a. Beam stated that he has assisted Sutcliffe, Olson, and sometimes Respondent Dr. Rick VanDomelen perform cherry-eye surgeries at Ridglan Farms.
b. Beam stated that "Heather (Sutcliffe) is a vet tech". Investigators reviewed records of licenses and certifications of the Wisconsin Veterinary Examining Board and observed that Sutcliffe is not certified in Wisconsin as a veterinary technician nor is she a licensed veterinarian.
c. The only medication/care that Beam said was used in the cherry-eye surgeries is a triple antibiotic.

d. Beam said that de-vocalization surgeries used to occur at Ridglan Farms, but "that was a long time ago. Been 10 years".
e. Beam explained that the delegation to perform cherry-eye surgeries and de-vocalization surgeries came "from the office".

18. During the February 5, 2025 inspection, Phillippi interviewed current Ridglan Farms employee Allan Olson (Olson).

a. Olson admitted that he performs cherry-eye surgeries at Ridglan Farms, along with Sutcliffe and Respondent Dr. Rick VanDomelen.
b. Olson explained that he puts proparacaine drops in the eye, someone would hold the dog and pull out the eyelid and snip it with a scissors. The dog is then put back into the cage.
c. Olson said there is no pain medication used. It varies on how long each dog bleeds for. Some don't bleed at all.
d. Olson admitted that he and Hiltbrand have performed de-vocalization surgeries on dogs, but it hasn't been done in years.
e. Olson explained that for de-vocalization surgeries, the dog would get an IV injection and sedated. He would then use a tongue forceps and cut the vocal cords. He explained that there was no pain control administered.

19. During the February 5, 2025 inspection, Mortenson interviewed current Ridglan Farms employee Shana Sigg (Sigg). Sigg was seen working in one of the buildings prior to the interview.

a. Sigg said that she has heard of cherry-eye surgeries being performed at Ridglan Farms, but she has had no direct involvement.
b. Sigg explained that she has heard that Respondent Dr. Rick VanDomelen and Sutcliffe perform the surgeries.
c. At this time, Sigg's husband, Jake Sigg approached her and Mortenson. At this point, Jake Sigg encouraged Sigg to change her statement to state that only Dr. Rick VanDomelen performs the surgeries. Sigg then changed her answer to state that "Rick only" performs the surgeries.

20. On February 18, 2025 Respondent sent a series of text messages to Board member Lyn Schuh. One of the messages read, "…*The reason I'm contacting you is that the animal rights crazies are filing complaints with the veterinary examining board about the veterinarians at Ridglan Farms, specifically me and one of those complaints is totally false. That would be allegation number 2. I don't think theVEB understands that we are allowed under the USDA as a research facility to*

delegate with proper training and documentation that non-veterinarians can perform certain procedures that are minor. I was just hoping that somebody on the veterinary examining board would be able to share this information with the other members since we are not able to defend our self in Dane county courts or at the veterinary examining board meetings at this point. I don't know if you're aware but on February 5, 30 people in 15 vehicles which included the Dane County sheriff, the DEA and the Wisconsin Department of agriculture under the veterinary examining board raided our facility. Many of them are armed and were very threatening to our employees if they did not tell them whatever they wanted. They said if you don't talk to us, you might be charged and be subject to criminal charges. as a veterinary examining board member, I thought you should know this. Hopefully you can share this before the meeting tomorrow at noon with some other board member or two. I'm available tomorrow between seven and whenever if you happen to have a moment to talk. Thank you, Lyn and have a good night."

21. Leah Staley has never been licensed in the State of Wisconsin to practice veterinary medicine, nor has she been certified as a veterinary technician.

22. Heather Sutcliffe has never been licensed in the State of Wisconsin to practice veterinary medicine, nor has she been certified as a veterinary technician.

23. Allan Olson has never been licensed in the State of Wisconsin to practice veterinary medicine, nor has he been certified as a veterinary technician.

24. Georgia Heller has never been licensed in the State of Wisconsin to practice veterinary medicine. Georgia is certified in the State of Wisconsin as a veterinary technician, under certification number 406269, first issued on September 9, 1992. Heller sent a letter to the Department which was received on February 17, 2025. The letter stated, "*I am writing to withdraw my veterinary technician license #406269 for Georgia Heller. Thought it was expired in 2023? Thank you.*" The Department acknowledged receipt of Heller's letter. The Department informed Heller via email that Heller may simply let her certification lapse at the end of 2025.

25. On March 11, 2025, the Board convened to determine a petition seeking a summary suspension of Respondent's license, based on numerous violations found during the February 5, 2025 inspection at Respondent's workplace, Ridglan Farms, as set forth in the affidavit. The Board considered the Respondent's treatment of 'cherry eye,' formally known as nictitans glands prolapse, to be a significant problem, both in the number of surgeries of questionable medical necessity, as well as the Board's understanding of the surgical technique used. There were also concerns with improper delegation, other surgeries, dental extractions, and recordkeeping.

At the March 11, 2025 meeting, Respondent addressed the Board and a stipulation was reached. The Board allowed Respondent to continue practicing veterinary medicine and avoid suspension by stipulating to abide by the conditions in Attachment A. Based on the stipulation, the Board entered an order titled, "Order Approving Stipulation to Resolve Pending Petition for Summary Suspension of Respondent's License." This order placed several conditions on Respondent's license rather than suspending it. The conditions included that Respondent comply with Wis. Admin. Code s. 1.52, pertaining to medical records, and include anesthesia monitoring in surgical records. (section 11(e) of the March 11, 2025 order); Only conduct nictitans gland prolapse repair surgery when it is medically necessary and document said reason (section 11(b) of the March 11, 2025 order); and perform a thorough exam to establish a risk analysis and to establish an appropriate analgesic and anesthetic protocol prior to performing dental extractions, ovariohysterectomies, and orchiectomies (section 11(a) and 11(c) of the March 11, 2025 order).

26. On September 8, 2025, Board investigator Carter and Supervisor Boyd conducted a follow-up inspection at Ridglan Farms, which essentially consisted of a request for medical/surgical records to determine compliance with the March 11, 2025 order. Carter and Boyd obtained more than 150 medical/surgical records of surgeries that took place between approximately March 12, 2025 and September 8, 2025. Each record was lacking the majority of the required information and violated the Board's March 11, 2025 order.

27. On September 30, 2025, the Board convened to consider the Petition for Summary Suspension of Respondent's license. Respondent's attorney claimed untimely notice pursuant to Wis. Admin. Code § VE 3.58, which references Wis. Stat. § 227.44 (1), requiring a 10 day notice absent an emergency exception.

CONCLUSIONS OF LAW

28. The Veterinary Examining Board has jurisdiction in this matter pursuant to Wis. Stat. § 89.07 (2).

29. Since at least 2008, based on the conduct detailed above and in the Affidavit, Respondent inappropriately delegated veterinary medical acts to individuals without the required license, education, training and experience, as prohibited by § VE 1.44(1)(a):

> *(1) In delegating the provision of veterinary medical acts to veterinary students, certified veterinary technicians and others, the veterinarian shall do all of the following:*
> *(a) Delegate only those tasks commensurate with the education, training, experience and demonstrated abilities of the person supervised.*

30. Since at least 2008, based on the conduct detailed above and in the Affidavit, Respondent inappropriately delegated surgical procedures to a veterinary technician and other persons not holding the required license as prohibited by § VE 1.44(2)(c):

> *(2) The following acts are limited to those holding a license under s. 89.06 (1), 89.06 (2m) (a), or 89.072, Stats.; a permit under s. VE 1.36, 1.38, or 1.40; or active status as a student at a college of veterinary medicine approved by the board, and may not be delegated to or performed by veterinary technicians or other persons not holding such license or permit:*
> *(c) Performing surgery, which means any procedure in which the skin or tissue of the patient is penetrated or severed but does not include any of the following:…*

31. Since at least 2008, based on the conduct detailed above and in the Affidavit, Respondent inappropriately delegated dental extractions to a person not holding the required license or certification as prohibited by § VE 1.44(2)(c)2.a.:

> *(2) The following acts are limited to those holding a license under s. 89.06 (1), 89.06 (2m) (a), or 89.072, Stats.; a permit under s. VE 1.36, 1.38, or 1.40; or active status as a student at a college of veterinary medicine approved by the board, and may not be delegated to or performed by veterinary technicians or other persons not holding such license or permit:*
> *(c) Performing surgery, which means any procedure in which the skin or tissue of the patient is penetrated or severed but does not include any of the following:…*
> *2. Activities considered the practice of veterinary medicine, but which a veterinarian may delegate to a certified veterinary technician, as specified in s. VE 1.44 (5) and (6), as follows:*
> *a. Simple dental extractions that require minor manipulation and minimal elevation.*

32. Since at least 2008, based on the conduct detailed above and in the Affidavit, Respondent engaged in unprofessional conduct, as defined by § VE 1.58(2): *Conduct in the practice of veterinary medicine which evidences a lack of knowledge or ability to apply professional principles or skills.*

33. Since at least 2008, based on the conduct detailed above and in the Affidavit, Respondent engaged in unprofessional conduct, as defined by § VE 1.58(4): *Gross, serious, or grave negligence, as compared to less serious or more ordinary acts of negligence, in the practice of veterinary medicine.*

34. Since 2008, based on the conduct detailed above and in the Affidavit, Respondent has violated and aided and abetted in violations substantially related to the practice of veterinary medicine, defined by § VE 1.58(7): *Violating or aiding and abetting the violation of any law or administrative rule or regulation substantially related to the practice of veterinary medicine.*

35. Between February 7, 2022, and February 6, 2025, based on the conduct detailed above and in the Affidavit, Respondent has engaged in unprofessional conduct, defined by Wis. Admin. Code § VE 1.58(19): *Failure to maintain records as required by s. VE 1.52.*

36. On and between approximately March 12, 2025 and September 8, 2025, based on the conduct detailed above and in the Affidavit, Respondent has engaged in unprofessional conduct as defined by Wis. Admin. Code § VE 1.58(19): *Failure to maintain records as required by s. VE 1.52.*

37. On and between approximately March 12, 2025 and September 8, 2025, based on the conduct detailed above and in the Affidavit, Respondent has engaged in unprofessional conduct, defined by Wis. Stats. § 89.07(1)(h): *In this section, "unprofessional conduct" includes, but is not limited to (h): Violating any order of the examining board.* This relates to Respondent violating the Board Order requiring that medical records be kept in accordance with Wis. Admin. Code § VE 1.52.

38. On and between approximately March 12, 2025 and September 8, 2025, based on the conduct detailed above and in the Affidavit, namely Respondent has engaged in unprofessional conduct, defined by Wis. Stats. § 89.07(1)(h): *In this section, "unprofessional conduct" includes, but is not limited to (h): Violating any order of the examining board.* This relates to Respondent failing to perform a thorough exam to establish a risk analysis and to establish an appropriate analgesic and anesthetic protocol prior to performing dental extractions, ovariohysterectomies, and orchiectomies. This relates to Respondent failing to perform nictitans gland prolapse repair surgeries only when medically indicated with such necessity documented in the medical records. This relates to Respondent failing to include anesthesia monitoring in surgical records.

39. The Board considered the claim of untimely notice, pursuant to Wis. Admin. Code § VE 3.58, and found the 10-day emergency exception applied in Wis. Stat. § 227.44(1). The Board found that notice was reasonable as an emergency existed due to the imminent need to protect public health, safety, and welfare.

Through the conduct described in the Affidavit and Findings of Fact, Respondent has engaged in conduct such that the public health, safety or welfare

imperatively requires emergency suspension of Respondent's license. Wis. Admin. Code § VE 3.62(3).

ORDER OF SUMMARY SUSPENSION

40. Respondent's license to practice veterinary medicine issued by the Wisconsin Veterinary Examining Board to Richard J. VanDomelen, D.V.M., license number 404991, is summarily SUSPENDED, effective immediately.

41. The suspension order is in effect and continues until the effective date of a Final Decision and Order issued in the disciplinary proceedings against the Respondent, unless otherwise ordered by the Board. Wis. Admin. Code § VE 3.62(4).

42. Respondent may request a hearing at any time to show cause why the summary suspension or limitation order should not be continued. Wis. Admin. Code § VE 3.62(5). Such request shall be filed with the Board at the following address:

WI DATCP, Division of Animal Health
Attn: VEB
2811 Agriculture Drive
P.O. Box 8911
Madison, WI 53708-8911

43. A hearing to show cause shall be scheduled for hearing on a date within 20 days of receipt by the Board of Respondent's request for hearing, unless a later time is requested by or agreed to by the Respondent. Wis. Admin. Code § VE 3.62(6).

44. A copy of this order shall be served upon Respondent by mail or by email if agreed to by Respondent or Respondent's attorney. Wis. Admin. Code § VE 3.64.

FOR WISCONSIN VETERINARY EXAMINING BOARD:

By: Alan Holter DVM
Alan Holter DVM (Sep 30, 2025 16:19:47 CDT)

Sep 30, 2025
Date

Print name: Alan Holter DVM
A Member of the Board