



Wisconsin Department of Agriculture, Trade and Consumer Protection
 Division of Animal Health
 PO Box 8911, Madison, WI 53708-8911
 Phone: (608) 224-4872 Fax (608) 224-4871

**INTERNAL
 USE ONLY**

CASE SUMMARY REPORT

INVESTIGATION DATE October 2024	CASE/CA NUMBER 149309	LICENSE / REGISTRATION NUMBER 267262-DS	
LEGAL ENTITY Ridglan Farms, Inc.	CONTACT NAME (If other than legal entity) Dr. Richard Van Domelen, DVM (facility manager)		
DBA Ridglan Farms	BUSINESS PHONE: <input checked="" type="checkbox"/> Land <input type="checkbox"/> Cell (608) 437-8670		
MAILING ADDRESS STREET 10489 W. Blue Mounds Rd.	CITY Blue Mounds	STATE WI	ZIP 53517
COUNTY Dane	TOWN Blue Mounds		

NATURE OF INVESTIGATION

Dog Seller Compliance Case: 149309

Compliance action against licensed 'Dog breeder' located in Dane County, WI

Ridglan Farms, Inc. ('Ridglan') operates as a 'Dog breeder' under Wis. Admin. Code § ATCP 16.01(5) and holds a Dog Seller & Dog Facility Operators ('DS') license with the Wisconsin Department of Agriculture, Trade & Consumer Protection ('department'). Ridglan operates a large, dog breeding facility in Dane County, Wisconsin where beagles are purpose-bred, raised, and sold to biomedical research buyers. Ridglan holds DS license 267262-DS.

During a routine inspection of the Ridglan facility on 6/06/2024 (Case 99107), department inspection staff found multiple violations of Wis. Admin. Code ATCP Chapter 16 (**Exhibit 1**). During a subsequent follow-up inspection of the Ridglan facility on 9/16/2024 (Case 143226), department staff found that multiple violations originally found on 6/06/2024 had still not been corrected and multiple additional violations were found (**Exhibit 2**). See 'Preliminary information' section below.

Based upon the findings from the two (2) previous inspections a referral was made to the compliance team to pursue additional enforcement action.

PERSONS INVOLVED

- | | |
|--|---|
| <p>A. Colin Benell
 Compliance Specialist
 Wisconsin DATCP – Division of Animal Health
 colin.benell@wisconsin.gov</p> | <p>C. Dr. Richard J. Van Domelen, DVM
 Veterinarian / Facility manager
 Ridglan Farms, Inc.
 rickvan@mhtc.net</p> |
| <p>B. Ridglan Farms, Inc.
 Respondent / Defendant, Dog breeder
 10489 W. Blue Mounds Rd, Blue Mounds, WI
 ridglan@mhtc.net</p> | <p>D. Dustin Boyd
 Compliance Officer
 Wisconsin DATCP – Division of Animal Health</p> |
| | <p>E. Eric McLeod
 Attorney/ Ridglan Legal representation
 Husch Blackwell
 eric.mcleod@huschblackwell.co</p> |

PRELIMINARY INFORMATION

As Ridglan operates as a 'Dog breeder' within the state, the facility is required to hold a DS license with the department and is subject to the requirements under Wis. Admin. Code ATCP Chapter 16. DS license holders are subject to department inspections pursuant to Wis. Admin. Code § ATCP 16.12(1)(a).

Ridglan also currently holds two licenses with the United States Department of Agriculture ('USDA') pursuant to the Animal Welfare Act ('AWA'). Ridglan holds a Class A Breeder license (35-A-0009) and a Research license (35-R-004). Inspection of these licenses are pursuant to AWA standards and the Code of Federal Regulations (CFR) and are conducted by USDA – Animal Care. USDA licensed dog breeders in the state are not exempt from holding a DS license if they meet the definition of a 'dog breeder' under Wis. Admin. Code § ATCP 16.02(1)(c) and must comply with the requirements under Wis. Admin. Code ATCP Chapter 16.

During the most recent routine inspection by USDA (09/25/2025), Ridglan's Class A Breeder license held 1,790 adult dogs and 500 puppies. Ridglan's Research license held 84 adult dogs and 0 puppies.

Although Ridglan is an active DS license holder, it should be noted that as a facility used only for the purpose of breeding, raising and selling dogs for scientific research, Ridglan is exempt from some sections of Wis. Admin. Code ATCP Chapter 16. Under Wis. Admin. Code § ATCP 16.20(3)(c), such facilities are exempt from indoor and outdoor housing requirements for dogs under Wis. Admin. Code §§ ATCP 16.22 and 16.24. Ridglan is currently the only facility in the state that qualifies for this exemption. As dogs at Ridglan are kept exclusively indoors, the facility is exempt from Wis. Admin. Code § ATCP 16.22, which details the regulations for indoor enclosures and indoor housing; including: enclosure floor area, enclosure configuration, enclosure construction, cleaning/ disinfection, and temperature/ lighting/ ventilation. Although Wis. Admin. Code § ATCP 16.20(3)(a), exempts Ridglan from complying with Wis. Admin. Code §§ ATCP 16.22 and 16.24, under Wis. Admin. Code § ATCP 16.20(3)(c)4., to qualify for those exemptions the dogs must be 'kept in enclosures that comply with 9 CFR, Chapter 1, subchapter A (animal welfare).' Accordingly, the department is required to enforce 9 CFR, Chapter 1, subchapter A, in respect to enclosures, when evaluating indoor housing standards for dogs at Ridglan during department inspections.

ATCP 16.20 Dog care; general. *The following standards of care apply to all dogs kept pursuant to a license under s. ATCP 16.02 (1), including any dogs that the license holder consigns to a home custody provider:*

(3) Housing and transportation.

(a) Except as provided in par. (c) and subs. (7), (8) and (9), dogs shall be kept in facilities that comply with ss. ATCP 16.22 and 16.24.

(b) Dogs shall be transported in compliance with s. ATCP 16.26.

(c) Paragraph (a) does not apply to a facility that is used only for the purpose of breeding, raising and selling dogs for scientific research, provided that all of the following apply:

- 1. The license holder was using that facility solely for that purpose on June 1, 2011, and any primary enclosures added or materially reconstructed since that date comply with ss. ATCP 16.22 and 16.24.*
- 2. The dogs are sold from the facility at which they are bred and raised.*
- 3. The dogs are sold only to animal care facilities licensed or registered by the United States department of agriculture or other countries' equivalent, and are not resold to any other person.*
- 4. The dogs are kept in enclosures that comply with 9 CFR, Chapter I, subchapter A (animal welfare).*

RIDGLAN FARMS COMPLIANCE HISTORY:

Ridglan has been licensed by the department since 2011 and has been inspected several times by department inspection staff. See Compliance history report (**Exhibit 3**). During multiple inspections, the department has cited violations of Wis. Admin. Code ATCP Chapter 16 and 9 CFR chapter 1 (as noted above for indoor housing standards). During recent inspections, repeat violations have been documented by the department.

The following are inspections where violations were documented:

October 26, 2016

Routine inspection conducted

Violation: CFR 3.6(2)(x) – Improper enclosures, dogs feet falling through gaps in the flooring.

Action: Warning Notice issued and follow-up inspection required

July 6, 2022

Routine inspection conducted

Violation: CFR 3.1(f) – Inadequate drainage & waste disposal

Violation: CFR 3.2(b) – Inadequate ventilation

Violation: CFR 3.1(c)(1)(i) – Improper surfaces of enclosures

Violation: CFR 3.1(c)(2) – Inadequate maintenance of surfaces within enclosures

Action: Follow-up inspection required

June 6, 2024

Routine inspection conducted. See DS Inspection report (Exhibit 1) and inspection photographs (**Exhibit 4**).

Violation: ATCP 16.20(2)(b) – Failure to provide daily body checks

Violation: ATCP 16.20(2)(e) – Failure to provide necessary veterinary exams

*Violation: CFR 3.1(f) – Inadequate drainage & waste disposal (**REPEAT VIOLATION**)*

Action: Follow-up inspection required

September 16, 2024

Follow-up inspection. See DS inspection report (Exhibit 2) and inspection photographs (**Exhibit 5**).

*Violation: ATCP 16.20(2)(b) – Failure to provide daily body checks (**REPEAT VIOLATION**)*

*Violation: ATCP 16.20(2)(e) – Failure to provide necessary veterinary exams (**REPEAT VIOLATION**)*

*Violation: CFR 3.1(f) – Drainage & Waste disposal (**REPEAT VIOLATION**)*

Violation: ATCP 16.20(6)(b) – Lack of daily positive human contact

Violation: ATCP 16.20(6)(d) – Deprived of contact for extended periods of time

Action: Refer to compliance

INVESTIGATION RESULTS

March 19, 2024

The department received an online complaint (DAH Complaint 150743) that included a 9-page brief drafted by Attorney Bonnie Klapper. The document titled ‘*Systemic violations of Wisconsin Penal Code Section 951.01 et seq. at Ridglan Farms Blue Mounds Dane County, WI*’ (**Exhibit 6**) requests law enforcement agencies to investigate and prosecute Ridglan for conditions and care that Klapper alleges represent animal cruelty under Wis. Stat. Ch. 951 – Crimes Against Animals. Within the document Klapper details surgeries that were allegedly being conducted on dogs at Ridglan without proper supervision and exposed dogs to unnecessary pain and harm. These surgeries included: devocalization and ‘cherry eye’ removal. Within the document it stated, ‘whistleblower testimony have revealed that

employees without veterinary licenses and only a few days training are performing cherry eye surgery at Ridglan.’ The ‘whistleblower also reported that the surgery was being done without anesthesia and hemostasis,’ that ‘dogs yelped in pain when the third eye lid was simply cut away with a scissors,’ and that there was ‘excessive’ and uncontrolled bleeding.’

This document was shared with DS licensing & inspection program staff. The department’s inspection staff was unaware of these surgeries being performed on dogs at the Ridglan facility and had not received any such ‘whistleblower’ reporting. Klapper was notified that a formal complaint should be filed with the Veterinary Examining Board (‘VEB’) regarding her concerns about improper delegation of care and improper surgical procedures. The VEB received this formal complaint in December 2024.

November 8, 2024

I, Colin Benell (Compliance Specialist, Wisconsin DATCP), emailed Ridglan a Notice of Administrative Conference (**Exhibit 7**). This notice was mailed via USPS to Ridglan on this date as well. The notice informed Ridglan of an administrative conference to be held on 12/03/2024 at the Prairie Oaks State Office Building in Madison, WI. Along with this letter was an Initial Notice of Non-Compliance (INON) that was issued to Ridglan on this date (**Exhibit 8**).

Due to department scheduling conflicts the 12/03/2024 conference needed to be rescheduled. The conference was rescheduled for 12/18/2024 at the same venue. An amended Notice of Administrative Conference was emailed to Ridglan (**Exhibit 9**).

December 6, 2024

The VEB received a complaint from Dane4Dogs similar to the complaint received from Klapper on March 19, 2024, alleging improper delegation of care and improper surgical procedures performed at Ridglan. See above, DAH Complaint 150743.

December 18, 2024

(10:00 am) - An administrative conference was held at the Prairie Oaks State Office Building in Madison, WI. The purpose of the meeting was to determine how Ridglan planned to take corrective action to address the alleged violations below. This assisted the department in determining an appropriate form of enforcement action for this case.

Department attendees:

- o Colin Benell (Compliance specialist, Wisconsin DATCP)
- o Dustin Boyd (Compliance officer, Wisconsin DATCP)
- o Dr. Yvonne Bellay, DVM (Epidemiologist/ DS program manager, Wisconsin DATCP)
- o Axel Candelaria-Rivera (Attorney, Wisconsin DATCP)

Ridglan attendees:

- o Dr. Richard Van Domelen, DVM (Veterinarian/ manager, Ridglan Farms)
- o Pamela Burke (Office manager, Ridglan Farms)
- o Dr. Jeffrey Ballmer, DVM (Owner, Ridglan Farms)
- o Dr. James Burns, DVM (Owner, Ridglan Farms)
- o Eric McLeod (Attorney, Husch Blackwell)
- o Rebecca Furdek (Attorney, Husch Blackwell)

Alleged violations:

Wis. Admin. Code § ATCP 16.20(2)(b) – Animal health and veterinary care

Failure to provide dogs with daily body, mobility, and behavior checks

Wis. Admin. Code § ATCP 16.20(2)(e) – Animal health and veterinary care

Failure to have veterinarian examine each dog as often as necessary to ensure adequate health care

Wis. Admin. Code § ATCP 16.20(6)(b) – Behavior and socialization

Failure to provide daily human contact and socialization, not limited to feeding time

Wis. Admin. Code § ATCP 16.20(6)(d) – Behavior and socialization

Depriving dogs of contact, activity, enrichment for extended periods of time, except for good cause

Wis. Admin. Code § ATCP 16.20(3)(c)4. – Housing and transportation

9 CFR AWA Subpart A, § 3.1(f) – Drainage and waste disposal

Failure to rapidly eliminate excreta and waste water

Wis. Admin. Code § ATCP 16.20(3)(c)4. – Housing and transportation

9 CFR AWA Subpart A, § 3.2(b) – Ventilation

Failure to provide adequate ventilation

During the course of the 3-hour meeting with Ridglan and Ridglan's legal counsel, Eric McLeod (Attorney, Husch Blackwell), a wide variety of topics were discussed pursuant to the department's allegations against Ridglan. The meeting was audio recorded. McLeod offered Ridglan's position regarding each of the department's allegations. McLeod argued that the department's allegations are unsupported and that the standards enforced by inspectors are unclear. McLeod stated that Ridglan is operating in 'good faith' and needs guidance from the department to address these allegations. McLeod explained that the standards in much of Wis. Admin. Code ATCP Chapter 16 are ambiguous and do not have specific, quantitative standards. McLeod requested guidance documents, policies, or procedures and he also requested any such guidance materials that the department uses to enforce inspection standards.

Statements made by Ridglan during the conference pursuant to the department's allegations:

GENERAL FACILITY OPERATIONS

- Ridglan's buildings house approximately 3,000 dogs in total. The breeding colony consists of approximately 600 adult females and 60 adult males. The facility produces approximately 70 litters/ month.
- Ridglan is primarily a 'Research facility' as only about 1/3 of revenue is generated from the sale of dogs.
- Ridglan currently has 19 employees that regularly work in the licensed facility. All caretakers do the following tasks: cleaning, feeding, observing, socializing, administer vaccinations.
- Animal care staff works from 5:00 am – 3:00 pm (Monday – Friday); there are no additional shifts/ day for dog care staff. On Saturday and Sunday mornings two (2) employees make necessary observations on all dogs and do any cleaning or feeding.

SOCIALIZATION

- Ridglan declined to specifically address department questions regarding daily human contact/ socialization. Ridglan stated that socialization/ contact with dogs takes a variety of forms in the facility. Ridglan stated that the department has failed to provide clear expectations with defined standards. Ridglan argued that the 'math does add up' and would be able to provide this based upon the number of employees and working hours. Ridglan argued that socialization is more than physical contact and includes multiple forms of 'interactions.'
- Ridglan stated that interaction types and length vary for each dog. Ridglan claims it's providing sufficient socialization/ contact to dogs. Ridglan claimed that the number of interactions with a particular dog varies each day. Ridglan stated that all employees are responsible for helping with socializing dogs, regardless of their position.
- Ridglan stated that the focus and priority for human contact is 3-4 weeks to 16 weeks of age for socialization. Ridglan stated that they also focus on dogs that 'need it' based upon their behavior. Pre-shipment dogs, puppies moving from whelping rooms, and dogs moving to growing pens are prioritized for socialization.
- Ridglan stated that they employ one (1) full-time socializer, who focuses primarily on whelping rooms and pre-shipment dogs. Ridglan stated that they have two (2) part-time employees who focus primarily on puppies and whelping rooms. Ridglan stated that the 4-5 dedicated employees in the breeding barn provide necessary contact to dogs in this building.

VENTILATION / SANITATION

- Ridglan argued that the alleged violations are not legally supported. Ridglan argued that 'housing facilities' are different than 'enclosure' and this is supported in CFR language.
- Waste is removed underneath enclosures Monday, Wednesday, and Fridays. Spot cleaning is done on a daily basis as necessary within enclosures. Hand washing and hose washing is performed to clean enclosures.
- Buildings have active and passive air exchange ventilation systems. Various types of fans are used to exchange air, intake fresh air, and remove air. Humidity is not controlled through a system. Temperature and air exchange / hour is the focus of their controls. Ammonia readings are taken and evaluated weekly. 0-5 ppm is a standard they pursue. Readings are taken in each room through a digital device. Readings are recorded and kept.
- Ridglan stated that exhaust fans have been dusted since last department inspections.

BODY CHECKS

- Ridglan argued that the injuries would have been observed later in the day and that it was unknown when the injuries occurred or manifested. The injuries are isolated incidents that should not be extrapolated to the entire facility.
- Ridglan stated that dogs are handled minimally every 3-4 weeks for nail trimming. Dogs in the breeding colony are moved around frequently to check for heat and whelping. Staff interact with dogs cage-side to evaluate dogs and observe behavior. Ridglan stated that they have increased the frequency of checks and that they try

their best to find any small injuries that may occur in dogs.

- On weekend days, two employees check each cage (cage-side) and interact with dogs.

GENERAL STATEMENTS

- Ridglan stated that maintenance is constantly being performed at the facility to make improvements.
- Ridglan argued that the department must be able to demonstrate measurable standards that are being enforced. According to Ridglan, the facility is complying based upon a 'good faith effort.' Ridglan argued that they have not been shown by the department why and how their practices are deficient. Ridglan argued that the business provides an important purpose to society and has a variety of regulations to follow. Ridglan requested that the department provide guidance and that it was not in the department's (or Ridglan's interests) to litigate these matters.
- Ridglan agreed to provide figures regarding socialization/ contact estimates/ dog. Ridglan stated additional employees have since been hired to assist with compliance.
- Ridglan argued that significant efforts are made to comply and that they care about the dogs in their custody. Ridglan stated that this is proven by the fact the dogs are in good condition and are well socialized. Ridglan stated that they want to comply and need guidance from the department about what is required.
- Ridglan did not acknowledge guilt for any of the allegations.

January 3, 2025

The department received a letter from McLeod (**Exhibit 10**) that articulated Ridglan's defense in regard to the department's allegations of non-compliance. The letter explains that Ridglan seeks to comply with the department and relevant regulations. McLeod requested that the department provide necessary guidance to Ridglan in regard to some "ambiguous requirements" as to assist Ridglan with compliance. McLeod stated that Ridglan believes it is in compliance, and it is incumbent upon the department to clearly demonstrate otherwise. McLeod stated that Ridglan seeks to have productive dialog with the department to address the department's concerns and hopefully avoid litigation.

February 5, 2025

Based on the December 6, 2024 complaint submitted to the VEB, the VEB directed Wisconsin VEB staff to investigate the allegations made in the complaint further. VEB staff conducted an unannounced inspection at the Ridglan facility to investigate allegations of veterinary malpractice and other violations of VEB regulations by Ridglan staff. During the course of this investigation VEB staff interviewed Ridglan staff, inspected facilities, and reviewed relevant records. The VEB investigated allegations of misconduct/ malpractice by staff at Ridglan, particularly in regard to 'cherry eye' (nictitans gland prolapse) removal surgeries and devocalization surgeries.

The findings from this VEB inspection/ investigation found numerous violations of VEB regulations by Ridglan veterinarian/ facility manager, Dr. Richard Van Domelen, DVM (license 404991); including:

- Inappropriate delegation of veterinary acts to be performed by unlicensed persons
- Inappropriate delegation of surgical acts to be performed by unlicensed persons
- Inappropriate delegation of dental extractions to be performed by unlicensed persons
- Engaging in unprofessional conduct & negligent malpractice as a licensed veterinarian
- Aiding/ abetting the violation of VEB requirements

As a result of these violations, the VEB pursued enforcement action against Dr. Van Domelen's veterinary license held by the VEB (**Exhibit 11 and 12**). The VEB later placed conditions upon Dr. Van Domelen's license that provided additional terms and supervision.

During the course of this VEB investigation, VEB staff requested that Ridglan provide records of surgeries performed at Ridglan by Ridglan staff. The VEB requested that Ridglan provide such records for the previous three (3) years. Ridglan provided the VEB with 801 pages of veterinary records for dogs relevant to the request (**Exhibit 13**). These veterinary records were specific to individual dogs and included: their identification information (tattoo number, sex, color), vaccination history, and other notes (surgeries, medications). Surgeries that were performed by Ridglan staff were listed on these documents and included the date it was performed.

The VEB shared these records and the VEB findings to department compliance staff and the DS licensing program given the nature of the allegations and potential of non-compliance with Wis. Admin. Code ATCP Chapter 16. A review of these records found that Ridglan performed approximately 500 surgeries on dogs and that these surgeries were often performed inappropriately in a manner which may cause harm or injury to dogs.

General findings by VEB investigators regarding 'cherry eye' removal surgeries (based upon interviews with Ridglan staff):

- Dogs would be held tight with their muzzle closed by an employee. Another employee would use a tweezer to clasp the prolapsed eye lid and then cut it off with scissors. Eyes occasionally bled profusely.
- No anesthesia, pain medication, or blood control was used for these procedures.
- Surgeries were provided cage-side, in a non-sterile environment.
- Surgeries are often performed by unlicensed Ridglan staff under the delegation of Dr. Van Domelen.

February 17, 2025

The department provided Ridglan with draft documents for a proposed stipulated civil forfeiture (CF) (**Exhibit 14**). The department also provided notice of an enforcement conference to be held on 2/25/2025 at the Prairie Oaks State Office Building in Madison, WI to review this proposal (this conference date was later rescheduled to 3/04/2025 due to conflicts) (**Exhibit 15**).

The department's proposal was a stipulated CF for the violations cited during previous inspections. The forfeiture included:

3 violations of ATCP 16.20(2)(b) for failing to provide daily body, mobility, and behavior checks on dogs at \$350.00 / count

Sub-total of all forfeitures: \$1,050.00

Sub-total for all surcharges and fees: \$506.50

Total for all counts and associated costs: \$1,556.50

February 28, 2025

The department sent an email to Ridglan which included two (2) official guidance documents; '*Dog Seller Guidance Daily Body, Mobility, and Behavior Checks*' (**Exhibit 16**) and '*Dog Seller Guidance Daily Positive Human Contact*' (**Exhibit 17**). These documents were created by the department to satisfy Ridglan's 12/18/2024 request for additional guidance related to these requirements. The email also notified Ridglan that the scheduled enforcement conference on 3/04/2025 was postponed. The delay was to provide additional time to review materials provided from the separate VEB investigation.

April 10, 2025

The department requested in writing that Ridgman provide final disposition records for each of the dogs of interest that had a surgical procedure performed on them.

May 1, 2025

The INON issued on 11/08/2024 (Exhibit 6) was amended and issued to Ridgman (**Exhibit 18**). Upon further review, the two violations of Wis. Admin. Code § ATCP 16.20(3)(c)4. were rescinded and would not be pursued in this case's action.

May 19, 2025

Ridgman provided the requested final disposition records for the identified dogs that had received surgical procedures (**Exhibit 19**). These documents included 205 pages of 'USDA Record of Disposition of Dogs and Cats' that recorded the sale of dogs to Ridgman buyers. These forms record the identity of dogs sold (identification number, date of birth, sex, weight, and description), the buyer of the dogs, and the date of sale. Ridgman is required to keep these records pursuant to both USDA licensing requirements and recordkeeping requirements under Wis. Admin. Code § ATCP 16.14.

Ridgman also provided five (5) pages of 'Death report' documents that recorded the deaths of dogs in the facility pursuant to the request (**Exhibit 19**). These records listed the identity of dogs that died, the date of death, and the cause of death. Ridgman is required to keep these records pursuant to both USDA licensing requirements and recordkeeping requirements under Wis. Admin. Code § ATCP 16.14.

**** These disposition records were compared against the list of identified dogs that had received surgical procedures. The final disposition of the dogs was cataloged in a spreadsheet, including the date of sale or death (**Exhibit 20**).*

June 3, 2025

Upon review of Exhibit 20 it was found that disposition records for approximately 248 dogs in the initial request were missing and not provided to the department as requested. The department furnished Ridgman a file with the identities of the 248 dogs that did not have a correlating disposition record and requested that these records be provided.

June 13, 2025

Ridgman provided additional disposition records to satisfy the department's request for the missing records of 248 dogs (**Exhibit 21**). These records included an additional 37 pages of 'USDA Record of Disposition of Dogs and Cats.'

**** These additional disposition records were compared against the list of identified dogs that had received surgical procedures. The final disposition of these dogs was cataloged in the same spreadsheet (**Exhibit 20**).*

Between 2/07/2022 and 2/22/2025 the following figures were gathered from the review of records provided by Ridgman:

- **409 total dogs received 'cherry eye' removal surgery.** Of these 409 dogs...
 - 308 dogs were sold by Ridgman to buyers following surgery/ surgeries
 - 93 dogs appear to still be alive and at the Ridgman facility (breeding or research facilities)
 - 5 dogs died at the Ridgman facility following surgery/ surgeries
 - 3 dogs do not appear to have a record of disposition that was provided
- **Numerous dogs received 'cherry eye' removal surgery on both eyes**
 - 488 total surgical procedures performed on the 409 total dogs
 - 370 total surgical procedures performed on the 308 dogs sold by Ridgman to buyers
- **3 total dogs received devocalization surgery**

September 22, 2025

(2:00 pm) - An enforcement conference with Ridglan was held at the Prairie Oaks State Office Building in Madison, WI. The purpose of the meeting was to propose the department's updated stipulated CF for violations of Wis. Admin. Code ATCP Chapter 16.

Department attendees:

- o Colin Benell (Compliance specialist, Wisconsin DATCP)
- o Dustin Boyd (Compliance officer, Wisconsin DATCP)
- o Jackie Cuellar (Attorney, Wisconsin DATCP)

Ridglan attendees:

- o Dr. Richard Van Domelen, DVM (Veterinarian/ manager, Ridglan Farms)
- o Pamela Burke (Office staff, Ridglan Farms)
- o Dr. Jeffrey Ballmer, DVM (Owner, Ridglan Farms)
- o Dr. James Burns, DVM (Owner, Ridglan Farms)
- o Eric McLeod (Attorney, Husch Blackwell)
- o Rebecca Furdek (Attorney, Husch Blackwell)

McLeod explained that Ridglan disputed the 308 violations of Wis. Admin. Code § ATCP 16.20(2)(a). McLeod made numerous legal arguments as to why these violations were unsupported, including that surgical procedures are not 'handling' and that such surgeries were under the direction of a veterinarian and therefore Wis. Admin. Code § ATCP 16.20(2)(e) applied. Boyd explained to McLeod that the purpose of the conference was to seek a resolution to the violations via a stipulation to the proposed civil forfeiture. Boyd explained that the proposal was the department's only offer to resolve the violations and that the forfeiture already includes reduced counts and penalty amount/ count. Boyd explained that if Ridglan did not stipulate to the civil forfeiture it would be referred to the District Attorney's Office requesting prosecution. Boyd explained that the department had been in contact with the District Attorney about the enforcement action and possible referral to their office.

The department's updated proposal was a stipulated civil forfeiture for the violations cited during previous inspections and this case. See proposed CF package (**Exhibit 22**). The forfeiture included:

308 violations of ATCP 16.20(2)(a) for failing to handle each dog as carefully as practicable and in a humane manner that does not cause physical harm or unnecessary injury at \$100.00 / count

Three (3) violations of ATCP 16.20(2)(b) for failing to provide daily body, mobility, and behavior checks on dogs at \$350/ count

Sub-total of all forfeitures: \$31,850.00

Sub-total for all surcharges and fees: \$23,298.50

Total for all counts and associated costs: \$55,148.50

McLeod stated that Ridglan had reviewed the documents prior to the meeting and did not require further explanation. McLeod stated that he would be advising Ridglan not to stipulate to the proposed CF. Boyd told McLeod that the department would grant Ridglan until end of business on 9/26/2025 to provide a stipulation.

September 26, 2025

McLeod notified the department that Ridglan would not be stipulating to the proposed CF to resolve the case. A letter (**Exhibit 23**) and attached documents were provided to argue Ridglan's position on the matter.

October 14, 2025

The department's findings in this case were referred to the Dane County District Attorney to request prosecution against Ridglan for the aforementioned violations in this report. The package to the District Attorney included a cover letter (**Exhibit 24**) and a draft of a CF complaint for use by the District Attorney if needed (**Exhibit 25**). The complaint was updated to reflect all allegations cited by the department relevant to this case.

CASE/CA# 149309

DISTRIBUTION: Copy 1 – Supervisor Copy 2 – Inspector Files

CASE FINDINGS:

A. Wis. Admin. Code § ATCP 16.20(2)(a) – Animal health and veterinary care

The VEB investigation's findings supported claims made by the complainant regarding the practice of 'cherry eye' removal surgeries by Ridglan. The investigation demonstrated that Ridglan had been conducting the practice on a large number of dogs each year over a number of years. The investigation demonstrated that the procedures were routinely being delegated by Dr. Van Domelen to unlicensed Ridglan staff and these procedures were being conducted in a manner that is inconsistent with standard veterinary practices. Dogs were forcefully held by staff and surgical procedures were performed on dog's eyes without anesthesia and often without pain control medication. Handling the dogs in this manner represented **a violation of Wis. Admin. Code § ATCP 16.20(2)(a)** which requires that each dog be handled as carefully as practicable and in a humane manner that does not cause physical harm or unnecessary injury.

Ridglan argues that the term "handle" in Wis. Admin. Code § ATCP 16.20(2)(a) does not encompass a surgical act such as cherry eye removal surgery. However, this interpretation of the code is consistent with previous department cases where enforcement action was taken against DS license holders that engaged in unlawful surgery on dogs in a dog breeding facility. This code has also been cited when taking action against DS license holders that were observed to be restraining or physically holding dogs in ways that would be harmful and abusive in nature.

Ridglan also argues that the surgeries were performed at the direction of Dr. Van Domelen, veterinarian and Ridglan facility manager. Pursuant to Wis. Admin. Code § ATCP 16.20(2)(e), "[a] licensed veterinarian shall examine each dog as often as necessary to ensure adequate health care. The examining licensed veterinarian shall use appropriate methods to prevent, control, diagnose, and treat diseases and injuries. The license holder shall follow the veterinarian's recommendations." Accordingly, Ridglan argues that the cherry eye removal surgeries were performed consistent with a veterinarian's recommendations and therefore any violations must be pursued against said veterinarian and not the facility. The department considers Ridglan's interpretation of the rule unreasonable and disagrees that so long as a dog breeder is following the recommendations of a veterinarian, they are exempt from all liability under Wis. Admin. Code chapter ATCP 16. Additionally, the rule states, "the licensed veterinarian shall use appropriate methods to prevent, control, diagnose, and treat diseases and injuries." Neither the surgical method (no general anesthesia, complete removal of nictitans gland), nor the practice of delegating the surgeries to unlicensed individuals is appropriate or accepted in the veterinary community.

The department requested various records from Ridglan regarding the dogs that had the 'cherry eye' removal surgery performed, pursuant to Wis. Admin. Code § ATCP 16.14(1). These records include all dogs that had the procedure completed during the last three (3) years. Accompanying records were requested that demonstrated the disposition of each dog that had received the procedure. Records demonstrated that at least 308 dogs that were sold by Ridglan from the licensed dog breeding facility had 'cherry eye' removal performed on at least one of their eyes while kept in the facility. This figure is based upon a number of dogs impacted, not the number of procedures performed.

B. Wis. Admin. Code § ATCP 16.20(2)(b) – Animal health and veterinary care

The findings from the inspections demonstrate that Ridglan failed to perform body checks on each dog in the facility each day; **a violation of Wis. Admin. Code § ATCP 16.20(2)(b)**. During two (2) inspections the department identified dogs that were actively displaying signs of injury (i.e. keeping weight off legs) or had physical signs of injuries which were more than 24 hours old. In these instances, there was no evidence that Ridglan was aware of the injuries that had been discovered by the department inspector. Department veterinary staff reviewed the photographs of the injuries.

Ridglan was cited for this violation during a routine inspection on 6/06/2024. An inspection report and INON were issued to Ridglan to provide notice and education. Additional violations of this regulation were then found a few months later during a 9/16/2024 follow-up inspection. Photographs of these injuries were taken by

department inspectors (**Exhibit 26**). These violations demonstrate that the necessary correction was not made to ensure that each dog is provided with daily body checks.

Within kennel facilities, a failure to provide dogs with an adequate body check each day may result in injuries and illnesses being undiscovered. This may cause such conditions to worsen as adequate care is not provided by caretakers or an attending veterinarian. Undiscovered conditions may also cause dogs to experience additional pain or discomfort without necessary intervention. Under Wis. Admin. Code § ATCP 16.20(2)(f), 'Sick, diseased or injured dogs shall be provided with timely veterinary care or shall be euthanized by a method described in Appendix 1 to the AVMA Guidelines for the Euthanasia of Animals: 2013 Edition published by the American Veterinary Medical Association.'

During the 12/18/2024 administrative conference, Ridglan stated that the facility is staffed from Monday – Friday (5:00 am – 3:00 pm) with approximately 19 employees. According to Ridglan, each building is staffed with employees, and all dogs are observed daily by their staff but during the weekend the facility is staffed with only two (2) employees for a morning shift. The primary role of these employees during the weekend is to feed the dogs and to inspect the entire facility and dogs. The large population within the dog breeding facility and the staff-to-dog ratio, particularly on the weekend, likely contributed to non-compliance.

Ridglan contends that the injuries would have eventually be found later in the day but did not address why the injuries were missed and undocumented for at least the prior 24 hours. Ridglan also argues that with a large population of roughly 3,000 dogs on average, 3 dogs is a miniscule number to cite a violation. However, Wis. Admin. Code § ATCP 16.20(2)(b) states body checks shall be performed "on each dog", rather than a percentage of dogs or "most" dogs.

C. Wis. Admin. Code § ATCP 16.20(2)(e) – Animal health and veterinary care

See findings for Wis. Admin. Code § ATCP 16.20(2)(b) above. Ridglan's dog caretakers, including the staff veterinarian, failed to check dogs as often as necessary to identify and treat dog injuries, **a violation of Wis. Admin. Code ATCP § 16.20(2)(e)**.

D. Wis. Admin. Code § ATCP 16.20(6)(d) – Behavior and socialization

Upon review, the department determined that no further action would be taken at this time regarding this alleged violation found during the 9/16/2024 inspection. The department retains the right to revisit this violation finding and take action at a later date if deemed necessary by the department.

E. Wis. Admin. Code § ATCP 16.20(3)(c)4. – Housing and transportation

9 CFR AWA Subpart A, § 3.1(f) – Drainage and waste disposal

Upon review, the department determined that no further enforcement action would be taken at this time regarding this alleged violation. Ridglan has been made aware of the department's concerns regarding these findings and encouraged improvement in care and facility maintenance. Accumulating large amounts of excrement and wastewater within an indoor housing facility is not a normal or accepted industry practice within dog breeding facilities.

F. Wis. Admin. Code § ATCP 16.20(3)(c)4. – Housing and transportation

9 CFR AWA Subpart A, § 3.2(b) – Ventilation

Upon review, the department determined that no further enforcement action would be taken at this time regarding this alleged violation. Ridglan has been made aware of the department's concerns regarding these findings and encouraged improvement in care and facility maintenance. Infrequent removal of excrement and wastewater in the facility will impact air quality, odors, and ammonia levels within dog breeding facilities.

EVIDENCE

- Exhibit 1.** Dog Seller & Dog Facility Operators Inspection report; Routine inspection (6/06/2024)
- Exhibit 2.** Dog Seller & Dog Facility Operators Inspection report; Follow-up inspection (9/16/2024)
- Exhibit 3.** 267272-DS Compliance screening, 10/03/2024
- Exhibit 4.** Inspection photographs, 6/06/2024
- Exhibit 5.** Inspection photographs, 9/16/2024
- Exhibit 6.** 'Systemic violations of Wisconsin Penal Code Section 951.01 et seq. at Ridglan Farms Blue Mounds Dane County, WI' document from Atty. Klapper.
- Exhibit 7.** Notice of Administrative Conference; mailed and emailed 11/08/2024
- Exhibit 8.** Initial Notice of Non-Compliance; issued 11/08/2024 (C. Benell)
- Exhibit 9.** Amended Notice of Administrative Conference, emailed 11/18/2024
- Exhibit 10.** Letter from McLeod, *Re: Ridglan Farms; Notice of Non-Compliance, Case No. 149309*, sent 1/03/2025
- Exhibit 11.** VEB: Affidavit in Support of Petition Seeking Summary Suspension of Respondent's License
- Exhibit 12.** VEB: Petition for Summary Suspension
- Exhibit 13.** Ridglan records; dog medical record (801 pages)
- Exhibit 14.** Stipulated Civil Forfeiture proposal to Ridglan, 2/17/2025
- Exhibit 15.** Notice of Enforcement Conference, emailed 2/17/2025
- Exhibit 16.** DATCP-DS Guidance document: Daily body, mobility, behavior checks
- Exhibit 17.** DATCP-DS Guidance document: Daily positive human contact
- Exhibit 18.** Initial Notice of Non-Compliance (amended), issued 5/01/2025
- Exhibit 19.** Ridglan records: Dog final dispositions, - 1st request, received 5/19/2025
- Exhibit 20.** 'Cherry eye' procedure log
- Exhibit 21.** Ridglan records: Dog final dispositions – 2nd request, received 6/13/2025
- Exhibit 22.** Stipulated Civil Forfeiture proposal to Ridglan, 9/22/2025
- Exhibit 23.** Letter from McLeod, '*Re: Ridglan Farms; August 11, 2025 Notice of Enforcement Conference And Proposed Civil Forfeiture Stipulation,*' 9/26/2025
- Exhibit 24.** Cover letter: Civil Forfeiture referral to Dane County District Attorney, 10/14/2025
- Exhibit 25.** Civil Forfeiture Complaint draft referral to Dane County District Attorney, 10/14/2025
- Exhibit 26.** Inspection photograph log: Dog injuries
- Exhibit 27.** Ridglan SOP (RDG-SOP-PRD-200-18): Socialization; revised 12/15/2023

VIOLATIONS

488 Counts:

ATCP 16.20 Dog care; general. The following standards of care apply to all dogs kept pursuant to a license under s. ATCP 16.02 (1), including any dogs that the license holder consigns to a home custody provider:

(2) Animal health and veterinary care.

(a) Each dog shall be handled as carefully as practicable and in a humane manner that does not cause physical harm or unnecessary injury.

- Between 2/07/2022 – 2/22/2025, Ridglan performed approximately 488 'cherry eye' (nictitans gland prolapse) removal surgeries on at least 409 dogs in the dog breeding facility, meaning multiple dogs received the procedure more than once. See Exhibits 13, 20. 308 of these dogs were born, raised, and sold from the licensed dog breeding facility. The remainder of the dogs are either deceased, still in possession of Ridglan, or the disposition is unknown. Based upon the VEB investigation it was found that these surgeries were conducted improperly by Ridglan staff, where inhumane handling caused unnecessary pain and harm to dogs. Dogs were forcefully restrained by unlicensed staff while surgery on the dog's eyes were performed with no anesthetic provided.

3 Counts:

ATCP 16.20 Dog care; general. The following standards of care apply to all dogs kept pursuant to a license under s. ATCP 16.02 (1), including any dogs that the license holder consigns to a home custody provider:

(2) Animal health and veterinary care.

(b) The responsible caretaker on the premises, or an individual implementing a caretaker's oral or written instructions, shall perform daily body, mobility, and behavior checks on each dog.

- On 6/06/2024, department inspectors observed a dog within enclosure 550/551 identified preliminarily as ZKA-8 or FZA-8 that was limping and keeping weight off her front right paw, which had what appeared to be a ruptured interdigital cyst. No documentation of the cyst was present on the information cards located outside of the enclosure(s) or the dry erase board(s) utilized to document interdigital cysts.

In follow up correspondence Ridglan stated "I believe the dog in question is actually LLG-0 and her card was in the 552 card holder spot. DOB 12Apr20. She has been receiving topical treatment and is looking almost normal." Inspectors did not observe a treatment record or 'flag' on the information card for enclosure 552 nor was enclosure 552 documented on the aforementioned dry erase board. In further correspondence Ridglan stated "Simply what happened was that an interdigital cyst was found on one of the 3,222 dogs we have that was not yet found by myself or one of our dedicated employees. The caretakers are very diligent and caring, but they are human and may not notice every minor finding immediately." See Exhibits 1, 26.

- On 9/16/2024, department inspectors observed a dog identified as FVC-0 / inside enclosure 737/739 that was limping while moving through the enclosure, not bearing any weight on the right front leg. Two partially healed scratches and/or puncture wounds and swelling were present on the leg near the carpal joint. No documentation of the injury was present on the enclosure card or the whiteboard documenting ongoing or necessary treatment(s). Ridglan representative stated no treatment had yet been provided and the injury "probably" would have been observed today. The second dog present in the same enclosure (FJA-9) appeared to have partially healed puncture / scratch marks on the snout.

A Ridglan representative on 9/20/24 responded to a request for follow up - "The enclosure numbers for the two dogs you asked about are 737 and 739. FVC-0 is the dog that had the small cut on its leg. Today there is a small scab present and she is normal in all other aspects. I attached a picture of the healed leg. Her pen mate is FJA-9." See Exhibits 2, 26.

3 Counts:

ATCP 16.20 Dog care; general. The following standards of care apply to all dogs kept pursuant to a license under s. ATCP 16.02 (1), including any dogs that the license holder consigns to a home custody provider:

(2) Animal health and veterinary care.

(e) A licensed veterinarian shall examine each dog as often as necessary to ensure adequate health care. The examining licensed veterinarian shall use appropriate methods to prevent, control, diagnose, and treat diseases and injuries. The license holder shall follow the veterinarian's recommendations.

- On 6/06/2024, department inspectors observed a dog within enclosure 550/551 identified preliminarily as ZKA-8 or FZA-8 that was limping and keeping weight off her front right paw, which had what appeared to be a ruptured interdigital cyst. No documentation of the cyst was present on the information cards located outside of the enclosure(s) or the dry erase board(s) utilized to document interdigital cysts or necessary treatment and no veterinarian had examined the dog.

In follow up correspondence Ridglan stated "I believe the dog in question is actually LLG-0 and her card was in the 552 card holder spot. DOB 12Apr20. She has been receiving topical treatment and is looking almost normal." Inspectors did not observe a treatment record or 'flag' on the information card for enclosure 552 nor

was enclosure 552 documented on the aforementioned dry erase board. In further correspondence Ridglan stated "Simply what happened was that an interdigital cyst was found on one of the 3,222 dogs we have that was not yet found by myself or one of our dedicated employees. The caretakers are very diligent and caring, but they are human and may not notice every minor finding immediately."

- On 9/16/2024, department inspectors observed a dog identified as FVC-0 / inside enclosure 737/739 that was limping while moving through the enclosure, not bearing any weight on the right front leg. Two partially healed scratches and/or puncture wounds and swelling were present on the leg near the carpal joint. No documentation of the injury was present on the enclosure card or the whiteboard documenting ongoing or necessary treatment(s). Ridglan representative stated no treatment had yet been provided and the injury "probably" would have been observed today. The second dog present in the same enclosure (FJA-9) appeared to have partially healed puncture / scratch marks on the snout. No veterinarian had examined either dog.

A Ridglan representative on 9/20/24 responded to a request for follow up - "The enclosure numbers for the two dogs you asked about are 737 and 739. FVC-0 is the dog that had the small cut on its leg. Today there is a small scab present and she is normal in all other aspects. I attached a picture of the healed leg. Her pen mate is FJA-9."

OTHER CONSIDERATIONS

Wis. Admin. Code § ATCP 16.20(6)(b) – Behavior and socialization

Pursuant to Wis. Admin. Code § ATCP 16.20(6)(b), "[a]ll dogs shall have daily positive human contact and socialization, not limited to feeding time."

Through inspections and the 12/18/2024 compliance conference, the department obtained information regarding Ridglan's socialization practices for the dogs in the facility. Specifically, Ridglan stated that the facility is staffed from Monday – Friday (5:00 am – 3:00 pm) with approximately 19 employees and that all dogs are observed daily by their staff. Ridglan contends that 'all employees are involved in socialization' and routinely interact with dogs during the course of their work but refused to further explain how socialization is provided to the approximately 3,000 dogs in the facility each day. Ridglan stated that the priority for positive contact is given to puppies and adolescent dogs, not older age classes of dogs in the facility. Employees that are dedicated to 'socializing' are generally only stationed in buildings with younger classes of dogs that are being raised for sale and/or future use for breeding. Ridglan's written socialization plan confirms that younger classes of dogs are prioritized for human contact and older classes of dogs (particularly dogs in the breeding colony) do not receive the same efforts (**Exhibit 27**). Ridglan argues that necessary positive human contact is made during the course of other work in the buildings, particularly by close proximity to dogs alone and other brief interactions. Ridglan also contends that brief cage-side interactions with dogs during cleaning (with no physical contact) is an acceptable form of socialization to provide to satisfy the requirement.

During the weekend and on holidays the facility is staffed with only two (2) employees for a 'morning shift'. Ridglan did not provide the hours of this shift but rather stated that the primary role of these employees during the weekend or holidays is to inspect the entire facility and provide necessary cleaning and feeding.

The department requested that Ridglan explain the roles and duties of each of the 19 employees, particularly with regard to positive human contact and socialization provided to each dog daily. Ridglan declined to provide the department with detailed information related to each employee's job duties during the 12/18/2024 compliance conference. Ridglan offered to provide the details of the duties of each employee in writing but to date Ridglan has not provided this information to the Department.

Based on the findings of previous inspections and the 12/18/2024 compliance conference, the department has identified potential noncompliance with socialization requirements under Wis. Admin. Code § ATCP 16.20(6)(b). The large population of approximately 3,000 dogs within the breeding facility and the limited

staffing, particularly on weekends, calls into question whether it is feasible for Ridglan to be socializing each dog daily, not limited to feeding time, as required under Wis. Admin. Code ATCP § 16.20(6)(b). Further investigation and records are likely necessary to accurately assess compliance with socialization requirements.

**It should be noted that Ridglan feeds dogs in a variety of ways, including gravity feeders that may hold multiple days of food for dogs in the enclosure. Dogs in the breeding colony are fed daily.*

SUMMARY / CONCLUSION

Based upon the type of the violations, the number of violations, and the repeat violations in the case; a proportionate CF was determined to be the appropriate enforcement action, see Figure 1. On 9/26/2025, Ridglan refused to stipulate to a CF offer for 311 violations and a total of forfeitures and fees of \$55,148.50 proposed by the department to resolve this case. Ridglan refused to acknowledge any wrongdoing. Based under Wis. Stat. § 173.41(15)(b)1., *a person who violates this chapter or any rule promulgated or order issued under this chapter, for which a specific penalty is not prescribed, may be required to forfeit not less than \$200 nor more than \$1,000 for the first offense and may be required to forfeit not less than \$200 nor more than \$2,000 for the 2nd or subsequent offense committed within 5 years of an offense for which a penalty has been assessed under this section. A forfeiture under this subsection is in lieu of a criminal penalty under sub. (1).*

VIOLATION	PENALTY STATUE	COUNTS	PENALTY
ATCP 16.20(2)(a)	173.41(15)(b)1.	488	Forfeiture of not more than \$1,000 for the first offense
ATCP 16.20(2)(b)	173.41(15)(b)1.	3	Forfeiture of not more than \$1,000 for the first offense
ATCP 16.20(2)(e)	173.41(15)(b)1.	3	Forfeiture of not more than \$1,000 for the first offense

Figure 1. Penalty range summary

On 10/14/2025, the department’s findings in this case were referred to the Dane County District Attorney to request a CF prosecution.

It should be noted that Ridglan’s activities are still under investigation by the appointed special prosecutor investigating alleged crimes under Wis. Stat. ch. 951. Enforcement action against Ridglan staff is still ongoing by the VEB. On 9/30/2025, Dr. Van Domelen’s Veterinarian license was summarily suspended for failure to abide by an order of the VEB.

It is unclear if any changes have been made to Ridglan’s operations to ensure compliance with department regulations; particularly in regard to daily body checks and daily positive human socialization. Ridglan denies allegations made by the department and claims that the facility has been meeting required minimum standards. Ridglan argues that the regulations under Wis. Admin. Code ATCP Chapter 16 are ambiguous and require the department to provide enforceable standards.

COMPLIANCE HISTORY OF SUBJECT - <i>List in chronological order</i>		
DATE	CASE NUMBER	INVESTIGATION RESULTS
10/26/2016	4253	Routine inspection: Warning Notice issued & Follow-up inspection required
7/06/2022	55816	Routine inspection: Violations cited & Follow-up inspection required
6/06/2024	99107	Routine inspection: Violations cited & Follow-up inspection required
9/16/2024	143266	Follow-up inspection: Violations cited & Referred to Compliance

INVESTIGATOR/INSPECTOR	
NAME Colin Benell	TITLE Animal Health Compliance Specialist
TELEPHONE NUMBER (608) 575-3207	EMAIL colin.benell@wisconsin.gov

CASE SUMMARY REVIEW	
DATE SUBMITTED 10/14/2025	CASE REVIEWED BY Dustin Boyd, Animal Health Compliance Officer
ACTION TAKEN Respondent refused to reach a mutual agreement with the department to resolve the violations. Case referred to the Dane County District Attorney's Office requesting prosecution.	
REFERRED TO CASE #	

NOTES:

END OF REPORT