

**STATE OF WISCONSIN
BEFORE THE VETERINARY EXAMINING BOARD**

IN THE MATTER OF THE
PROCEEDINGS AGAINST

RICHARD VAN DOMELEN, D.V.M.,
RESPONDENT.

AFFIDAVIT IN SUPPORT OF
PETITION SEEKING
SUMMARY SUSPENSION
OF RESPONDENT'S
LICENSE

Wisconsin Veterinary Examining Board Case No. 24 VET 158

Erin Carter, being first duly sworn on oath, states the following:

1. I am an Investigator with the Wisconsin Department of Agriculture Trade and Consumer Protection (WDATCP), assigned to work with the Veterinary Examining Board (Board). I have been employed with WDATCP since September of 2003 (21+ years). My current job duties include investigating complaints that come before the Board. I have interviewed witnesses pertaining to the above-named complaint.
 - a. I believe the statements of Matthew Reich, former employee of Ridglan Farms, Inc. (Ridglan Farms), to be true as they are statements based on his observations and direct involvement in the alleged violations. Mr. Reich's statements are consistent with statements of [other former and] current employees of Ridglan Farms.
 - b. I believe the statements of Scott Gilbertson, former employee of Ridglan Farms, to be true as they are statements based on his observations and direct involvement in the alleged violations. Mr. Gilbertson's statements are consistent with statements of [other former and] current employees of Ridglan Farms.
 - c. I believe the statements of Ethel "Em" Jenson, current employee of Ridglan Farms, to be true as they are statements based on her observations and direct involvement in the alleged violations.
 - d. I believe the statements of Kurt Tollakson, current employee of Ridglan Farms, to be true as they are statements based on his observations of the alleged violations.
 - e. I believe the statements of Taylor Brown, current employee of Ridglan Farms, to be true as they are statements based on her observations and direct involvement in the alleged violations.
 - f. I believe the statements of Christopher Nachkash, current employee of Ridglan Farms, to be true as they are statements based on his observations and direct involvement in the alleged violations.

6. 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.
7. On January 8, 2025, my supervisor, Compliance Officer Dustin Boyd and I 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 Van Domelen 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.
8. On January 13, 2025, myself and my supervisor, Compliance Officer Dustin Boyd, 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 Van Domelen 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 Hiltbrandt (Hiltbrandt) 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 Hiltbrandt 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, or Hiltbrandt 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 three would be more, some days there would be none.
- l. Reich stated that on several occasions he had provided assistance to co-workers Hiltbrandt and Olson who would perform “de-vocalization” surgeries on dogs.
- m. Reich described the process to start with Hiltbrandt and Olson gathering about 30-40 dogs in a group outside of the kennels/cage-side. Hiltbrandt or Olson would give each dog an injectable sedative, however the dogs appeared to be awake. Reich would support each dog while Hiltbrandt and Olson performed the surgery. Hiltbrandt 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.
- 9. On February 5, 2025, myself 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).
- 10. During the February 5, 2025 inspection, I interviewed current Ridglan Farms employee Ethel "Em" Jenson (Jenson). Jenson was seen working in one of the buildings prior to my interview.
 - a. Jenson stated that she has assisted Heather Sutcliffe (Sutcliffe) and Olson with cherry-eye surgeries at Ridglan Farms.
- 11. During the February 5, 2025 inspection, I interviewed current Ridglan Farms employee Kurt Tollakson (Tollakson). Tollakson was seen working in one of the buildings prior to my 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.
- 12. During the February 5, 2025 inspection, I interviewed current Ridglan Farms employee Taylor Brown (Brown). Brown was seen working in one of the buildings prior to my 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 Ridgland Farms. As part of these duties, she explained she performs dental extractions as well.

13. During the February 5, 2025 inspection, Ulteig interviewed current Ridgland 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 Ridgland Farms.
- b. Nachkash explained that generally, he will hold the dog while Sutcliffe, Olson, or Van Domelen 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 Van Domelen.

14. During the February 5, 2025 inspection, Ulteig interviewed current Ridgland 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 Ridgland 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 Ridgland 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, Hiltbrandt 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 Hiltbrandt 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 Van Domelen. She said that Van Domelen trained her how to perform the surgeries.
15. 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.
16. 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 Van Domelen 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".

17. 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 Van Domelen.
- 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 Hiltbrandt 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.

18. 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 Van Domelen 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 Van Domelen performs the surgeries. Sigg then changed her answer to state that "Rick only" performs the surgeries.

19. 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 the VEB 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. 608-437-8670. Thank you, Lyn and have a good night."

20. Leah Staley has never been licensed in the State of Wisconsin to practice veterinary medicine, nor has she been certified as a veterinary technician.
21. Heather Sutcliffe has never been licensed in the State of Wisconsin to practice veterinary medicine, nor has she been certified as a veterinary technician.
22. Allan Olson has never been licensed in the State of Wisconsin to practice veterinary medicine, nor has he been certified as a veterinary technician.
23. 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.
24. This affidavit is submitted in support of the Department's Petition Seeking Summary Suspension of Respondent's License

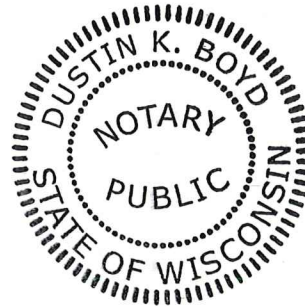
Erin Carter

Erin Carter
Investigator
Veterinary Examining Board

March 5, 2025
Date

State of Wisconsin
County of Dane

Subscribed and sworn to before me
This 5th day of March, 2025
By Erin Carter



[Signature]
Signature of Notary

My commission expires March 25, 2026