

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

IN THE MATTER OF THE
PROCEEDINGS AGAINST

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

PETITION SEEKING
SUMMARY SUSPENSION OF
RESPONDENT'S LICENSE

Wisconsin Veterinary Examining Board Case No. 24 VET 158

Petitioner, Helen E. Kennebeck, Veterinary Examining Board Interim Disciplinary Counsel at the Department of Agriculture, Trade and Consumer Protection, being first duly sworn on oath states that she is interim Disciplinary Counsel, as defined under § VE 3.02(14), Wis. Admin. Code, for the Wisconsin Veterinary Examining Board (Board) and petitions the Board for an order summarily suspending Respondent's license to practice veterinary medicine, pursuant to § VE 3.56, Wis. Admin. Code, and § 227.51, Wis. Stat.

Petitioner bases this petition on the affidavit of colleague Erin Carter, Investigator with Wisconsin Veterinary Examining Board and the Department of Agriculture, Trade and Consumer Protection (Department), attached hereto and incorporated herein by reference.

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, 2811 Agriculture Drive, Madison Wisconsin, 53708.
3. Dr. Richard Van Domelen, 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 the Department for Respondent is 10489 W. Blue Mounds Rd., Blue Mounds, WI 53517.

JURISDICTION

4. The Veterinary Examining Board has jurisdiction in this matter pursuant to § 89.07(2), Wis. Stat. The process for this action is found in §§ VE 3.54 – VE 3.70, Wis. Admin. Code.

STATEMENT OF FACTS

5. As it pertains to the petition at bar, on December 5, 2024, the Board received a complaint (dated December 3, 2024) from Rebekah Robinson on behalf of Dane4Dogs, making several allegations against Respondent, all of which are detailed below and in the Affidavit of Erin Carter filed in support of this Petition.

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

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);

Wis. Admin. Code VE § 1.44 (improper delegation of surgical procedures to non-veterinary students and non-veterinary technicians); and

Wis. Stat. §§ 951.02 (misdemeanor intentional or negligent cruel treatment of animals by failing to examine and provide adequate health care for dogs);

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);

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).

VIOLATION 1:

Since 2008, based on the conduct detailed 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.

Respondent's conduct imperatively requires immediate suspension of his license.

VIOLATION 2:

Since 2008, based on the conduct detailed 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:...

Respondent's conduct imperatively requires immediate suspension of his license.

VIOLATION 3:

Since 2008, based on the conduct detailed 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.

Respondent's conduct imperatively requires immediate suspension of his license.

VIOLATION 4:

Since 2008, based on the conduct detailed 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.* Respondent's conduct imperatively requires immediate suspension of his license.

VIOLATION 5:

Since 2008, based on the conduct detailed 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.*

Respondent's conduct imperatively requires immediate suspension of his license.

VIOLATION 6:

Since 2008, based on the conduct detailed 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.*

Respondent's conduct imperatively requires immediate suspension of his license.

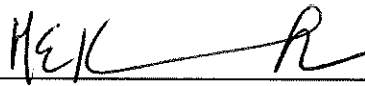
DEMAND FOR RELIEF

Whereas, based upon the facts alleged above and in the incorporated affidavit, Respondent has repeatedly demonstrated he is not able to abide by the rules and laws pertaining to proper surgery techniques, surgery delegation, and dental extraction delegation in veterinary medicine. Whereas, Respondent has directly engaged in and has directed and delegated to others to cause unnecessary and excessive pain or suffering in dogs. Whereas, Respondent has engaged in gross, serious, or grave negligence in the practice of veterinary medicine. Whereas, Respondent has engaged in and is likely to engage in such conduct that the public health, safety or welfare imperatively requires summary suspension or limitation of Respondent's credential pursuant to the authority under § VE 3.56(1), Wis. Admin. Code.

NOW, THEREFORE, Petitioner respectfully requests the Board issue an **ORDER OF SUMMARY SUSPENSION** suspending Respondent's license to practice veterinary medicine in the State of Wisconsin immediately and without hearing.

Dated this 5th day of March, 2025.

Petitioner:

A handwritten signature in black ink, appearing to read 'HEK' followed by a long horizontal stroke and a large 'R'.

Helen E. Kennebeck
Interim Disciplinary Counsel
Wisconsin Veterinary Examining Board
Wisconsin Department of Agriculture, Trade
and Consumer Protection
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