

Eric M. McLeod  
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September 26, 2025

**VIA EMAIL**

Colin Benell  
Animal Health Compliance Specialist  
Wisconsin Department of Agriculture, Trade,  
and Consumer Protection  
2811 Agriculture Drive  
Madison, WI 53718  
[Colin.benell@wisconsin.gov](mailto:Colin.benell@wisconsin.gov)

***Re: Ridglan Farms; August 11, 2025 Notice of Enforcement Conference and  
Proposed Civil Forfeiture Stipulation***

Dear Mr. Benell,

On November 18, 2024, Ridglan Farms received a notice of non-compliance from the Wisconsin Department of Agriculture, Trade and Consumer Protection (“DATCP”) that identified a small number of alleged non-compliance items related to Ridglan Farms’ daily checks of its dogs under ATCP § 16.20(6)(b) and ATCP §§ 16.20(2)(b) and (2)(e) and the waste disposal and ventilation at its facility under ATCP § 16.20(3)(c)(4). An administrative enforcement conference between DATCP staff and Ridglan Farms representatives was held on December 18, 2024 to discuss these items. A summary of the December 18 administrative enforcement conference is contained in my letter to you dated January 3, 2025, a copy of which is included with this letter as Exhibit “A”. In my January 3 letter, I raised a number of factual and legal questions and concerns about the nature of the alleged non-compliance items. To date, we have received no response from DATCP specifically addressing these questions or concerns.<sup>1</sup>

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<sup>1</sup> One exception to DATCP’s failure to respond to any of our questions and concerns relates to our request for any guidance documents that address compliance with the daily check requirements under ATCP § 16.20(6)(b) and ATCP §§ 16.20(2)(b) and (2)(e). Although DATCP made it clear that no such guidance documents existed at the time of DATCP’s November 18, 2024 notice or the December 18, 2024 administrative conference, such guidance documents were subsequently prepared *after-the-fact* and have since been provided to us.

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On February 17, 2025, Ridglan Farms received a notice from DATCP scheduling another enforcement conference and proposing a civil forfeiture stipulation to resolve the alleged items of non-compliance. The February 17 notice and proposed stipulation included just three alleged claims under ATCP §§ 16.20(2)(b) and proposed a forfeiture amount of \$1,556.50. The other alleged non-compliance items contained in the November 18 notice were excluded from the February 17 notice and proposed stipulation.<sup>2</sup> A copy of the February 17 notice and proposed stipulation are also included with this letter as Exhibit “B”. Shortly after receiving the February 17 notice, we were informed by DATCP legal counsel that the matter was being put on hold pending on-going investigations by the Veterinary Examining Board (“VEB”).

In the interim, on April 9, 2025, we shared with DATCP a recent detailed inspection report received from the Animal Care unit within the USDA Animal and Plant Health Inspection Service (“USDA Inspection Report”). As you know, Ridglan Farms is regulated and licensed by the USDA, holding both a USDA Class A license and operating as a USDA Class R-licensed research facility. As a USDA-licensed facility, Ridglan Farms is regulated under the Animal Welfare Act, 7 U.S.C. § 2131 *et seq.*, and is required to comply with numerous protocols and procedures administered under that law in caring for its animals.

The USDA Inspection Report detailed the results of an unannounced USDA inspection of Ridglan Farms’ facilities on February 4, 2025, which, as evidenced by the contents of the Report, was conducted in response to a complaint filed against Ridglan Farms. While the name of the complainant is not disclosed, the matters addressed therein are the same as those previously raised by Dane4Dogs in its own prior allegations concerning Ridglan Farms’ operations, including Dane4Dogs’ complaint submitted to the VEB. As your February 17, 2025 notice acknowledged the overlap between its own investigation and the VEB matter, the items addressed in the USDA Inspection Report are directly relevant to the items of alleged noncompliance raised by DATCP.

Notably, the USDA Report rigorously addressed each of the allegations, concluding: “No non-compliant items identified during this inspection.” Specific to the two individual dogs which we understood both Dane4Dogs and DATCP to be basing its factual allegations against Ridglan Farms, the USDA Inspection Report concluded that there were “no wounds on either dog observed,” and that “[i]f either of these [dogs] had a lesion in the past, inspection observations suggest that the condition was resolved.” The USDA Inspection Report also addressed—and found

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<sup>2</sup> We presume the waste disposal and facility ventilation items under ATCP § 16.20(3)(c)(4) were excluded because DATCP recognized, based on the points made in my January 3, 2025 letter, that those matters are regulated by the United States Department of Agriculture (“USDA”) under the Federal Animal Welfare Act and are expressly excluded from DATCP’s authority under its own rules.

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Ridglan Farms to be in compliance with—a number of other key items, including ventilation, adequate veterinary care, and socialization/positive interaction. A copy of the USDA Inspection Report is included with this letter as Exhibit “C”. Note, this Report is consistent with past USDA inspection reports which have routinely found Ridglan Farms to be in compliance with the requirements of the Animal Welfare Act.

On August 11, 2025, Ridglan Farms received another notice from DATCP scheduling another enforcement conference and proposing a revised civil forfeiture stipulation. The revised stipulation included the three alleged claims under ATCP §§ 16.20(2)(b) that were included in DATCP’s February 17, 2025 stipulation. The revised stipulation also included 308 claims related to a single veterinary medical procedure involving nictitans gland prolapse, commonly referred to as “cherry eye.” In the proposed stipulation, DATCP claims that performance of this procedure violates ATCP § 16.20(2)(a), a provision which specifically addresses the handling of dogs. Based on the addition of 308 claims related to a single veterinary medical procedure, DATCP proposed a civil forfeiture amount of \$55,148.50. A copy of the August 11, 2025 notice is included with this letter as Exhibit “D”.

On Monday, September 22, 2025, an enforcement conference was held at DATCP’s offices in Madison to address the August 11 notice and proposed stipulation. Ridglan Farms representatives attended the September 22 enforcement conference with the intent to discuss, in good faith, the claims contained in the proposed stipulation. In addition to addressing the three claims from the February 17 notice, Ridglan Farms intended to explain why, as a matter of law, the 308 new “cherry eye” claims were unfounded. However, it was quickly made clear that DATCP had no interest in any productive or meaningful discussion about those claims. Ridglan Farms was told quite clearly that there would be no negotiation regarding these claims. Rather Ridglan Farms was told to either stipulate to the 311 violations and admit liability or the matter will be referred to the District Attorney for enforcement. Ridglan Farms was told to respond by today’s date indicating whether it would so stipulate.

Ridglan Farms rejects the proposed stipulation. It does not intend to admit liability to legally meritless claims. While Ridglan Farms remains willing to engage in further discussions and even pursue some form of compromise in order to bring an end to these misguided enforcement efforts, given DATCP’s unreasonable position we will be forced to defend against a civil enforcement action, assuming one is actually brought. We are disappointed in DATCP’s conduct throughout this proceeding, which seems designed to harm a business that has operated lawfully for 60 years, rather than properly enforcing the regulatory standards contained in ATCP Ch. 16.

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Sincerely,

HUSCH BLACKWELL LLP



Eric M. McLeod  
Partner

Encl.

cc: Dustin Boyd, Compliance Officer, DATCP ([dustin.boyd@wisconsin.gov](mailto:dustin.boyd@wisconsin.gov))  
Jackie Cuellar, DATCP ([jackie.cuellar1@wisconsin.gov](mailto:jackie.cuellar1@wisconsin.gov))

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Eric M. McLeod  
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**EXHIBIT**  
**A**

January 3, 2025

## VIA EMAIL

Colin Benell  
Animal Health Compliance Specialist  
Wisconsin Department of Agriculture, Trade,  
and Consumer Protection  
2811 Agriculture Drive  
Madison, WI 53718  
[Colin.benell@wisconsin.gov](mailto:Colin.benell@wisconsin.gov)

***Re: Ridglan Farms; Notice of Non-Compliance, Case No. 149309***

Dear Mr. Benell,

As you know, I represent Ridglan Farms. The purpose of this letter is a) to memorialize the December 18, 2024, administrative conference between you and other representatives of the Wisconsin Department of Agriculture, Trade and Consumer Protection (“DATCP”) and representatives of Ridglan Farms; and b) to address what we understand to be the next steps to resolve DATCP’s concerns referenced in its November 18, 2024, Initial Notice of Non-Compliance (“Notice”).

### Introductory Comments

The conference between DATCP and Ridglan Farms spanned over three hours and included a wide range of detailed factual questions posed by DATCP, such as the number of dogs housed at Ridglan Farms and their relative ages, the size and number of enclosures in each building on-site, the ventilation and air quality of each such building, staffing decisions and responsibilities of staff members, among dozens of other questions. Ridglan Farms provided detailed, factual responses to these questions, along with the history of its operations and, in several instances, matched its explanations to specific buildings on a physical map of Ridglan Farms’ facilities that had been provided by DATCP. My client is confident that its transparency helped DATCP develop

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a better understanding of and appreciation for Ridglan Farms' operations and commitment to regulatory compliance.

As we acknowledged early in the conference, we recognize that the nature of Ridglan Farms' operation—the use of animals for important scientific research, including the development of vaccines—is opposed by certain animal rights groups. Ridglan Farms has been targeted by activists who have threatened to continue their campaign “until every animal is free.”<sup>1</sup> Yet, this small but vocal opposition does not change the fact that Ridglan Farms' activities are entirely lawful. Nor should such opposition affect DATCP's exercise of its regulatory authority. Based on comments made by DATCP representatives during the conference, it appears DATCP agrees. We were encouraged by DATCP's confirmation that the Notice was not tied in any way to the recent media smear campaign or the petition filed by activists in Dane County Circuit Court. DATCP also confirmed that it treats all licensed dog breeders similarly; the scale or size of an operation does not bear on DATCP's decision on whether to bring an enforcement action.

Throughout our conference, Ridglan Farms reinforced that it seeks to fully comply with all applicable regulations, and in many instances, it goes above and beyond quantifiable standards. For example, while acknowledging that Ridglan Farms is exempt from ATCP § 16.22, DATCP referred to its internal policy for measuring ammonia that encourages readings below 15 parts per million (PPM). However, Ridglan Farms' own standards are far more stringent, aiming for less than 5 PPM. In fact, Ridglan Farms would make ventilation adjustments if ammonia levels even approached 10 PPM, let alone 15 PPM. In addition, to ensure up-to-date readings, Ridglan Farms recently increased its ammonia reading frequency from monthly, to biweekly, to now weekly.

Nevertheless, from the outset of the conference, Mr. Boyd made reference to Ridglan Farms' “violations” in June and September of 2024, emphasizing that “accountability” will “go a long way” to resolve this matter through an enforcement action. This initial framing of our discussion was disappointing, as DATCP referred to the conference as a “fact-finding process,” apparently to first learn about Ridglan Farms' operations. Ridglan Farms is confident that it has complied with the provisions cited in the Notice. Therefore, what Ridglan Farms hoped to accomplish at the administrative conference—and still hopes to accomplish—is to receive from DATCP clear, measurable guidance as to what DATCP believes must be done to achieve and remain in compliance. Ridglan Farms cannot demonstrate “accountability” if there is confusion about what the standards are.

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<sup>1</sup> See, e.g., DIRECT ACTION EVERYWHERE (accessed Dec. 27, 2024, <https://www.directactioneverywhere.com/#Push> (“Until every animal is free... Direct Action Everywhere is a global network of activities working to achieve revolutionary social and political change for animals in one generation.”)).

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## Alleged Violation of ATCP § 16.20(6)(b)

During an early portion of the conference, DATCP focused on ATCP § 16.20(6)(b), which requires all dogs to receive “daily positive human contact and socialization, not limited to feeding time.” *See* ATCP § 16.20(6)(b). Ridglan Farms expected to learn from DATCP what constitutes adequate contact and socialization. Instead, Ridglan Farms was met with the open-ended question: “What does positive human contact mean to you?” When replying, respectfully, that the regulator should inform the regulated community what the relevant standards mean, DATCP was unwilling to do so. Mr. Boyd even acknowledged that § 16.20(6)(b) does not prescribe a particular length of time, but vaguely suggested that DATCP had concerns regarding Ridglan Farms’ staffing levels. While Ridglan Farms strongly believes that its staffing levels and the time devoted to “daily positive human contact and socialization, not limited to feeding time” goes above and beyond compliance with ATCP § 16.20(6)(b), we were troubled by the fact that DATCP was unable to articulate any basis for a contrary opinion.

## Alleged Violation of ATCP §§ 16.20(2)(b) and (2)(e)

Relatedly, the conference included a discussion of Ridglan Farms’ daily body checks on dogs, in reference to ATCP §§ 16.20(2)(b) and (2)(e). ATCP § 16.20(2)(b) requires that a responsible caretaker on the premises “shall perform daily body, mobility, and behavior checks on each dog,” while ATCP § 16.20(2)(e) requires that a “licensed veterinarian shall examine each dog as often as necessary to ensure adequate health care.” In what appears to be the sole evidence for alleged violations of these two provisions, DATCP pointed to three dogs (out of more than 3,000 at Ridglan Farms’ facility) that were mentioned in its June and September 2024 inspection reports. These dogs were observed during DATCP inspections to have injuries not from “that day.” Ridglan Farms noted that it is likely the dog simply wasn’t seen yet that day by Ridglan Farms staff. Ridglan Farms also noted that as a practical matter, an injury like the observed interdigital cyst could have been present the day prior but hadn’t yet manifested itself as a visible impairment—whether to DATCP inspectors, a Ridglan Farms veterinarian, or any other observer. DATCP acknowledged that “we could debate and never reach an answer” on how long an injury was present. Yet, in justifying the inclusion of these issues in the Notice, Mr. Boyd pointed generally to the combination of these three observed injuries and the “math” regarding Ridglan Farms’ staffing.

To be clear, during the discussion of daily positive contact and daily body, mobility and behavior checks, at no time did DATCP indicate the number of staff members and/or amount of time required to achieve compliance with ATCP §§ 16.20(2)(b), (2)(e) or (6)(b). Instead, DATCP repeatedly stated that Ridglan Farms must have “enough” employees to comply. Ridglan Farms

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explained its firm belief that its current staffing (recently increased from 16 staff members to 19) *is* enough. For example, with approximately 3,000 dogs and 19 employees, all of whom devote part of each day to socialization, a full minute of contact per dog only requires 158 minutes (or approximately 2.5 hours) of a full-time employee's workday. Particularly with at least one employee devoted *full-time* to socialization, this average duration of time is even less for the remaining employees. We would welcome additional discussion on this point to resolve DATCP's staffing-related concerns.

### Alleged Violation of ATCP § 16.20(3)(c)(4)

The final portion of our conference focused on Ridgland Farms' waste disposal and ventilation practices in relation to ATCP § 16.20(3)(c)(4), which requires dogs to be "kept in *enclosures* that comply with 9 CFR, Chapter I, subchapter A" (emphasis added; hereinafter "the AWA"). We expressed concerns, as a matter of statutory construction, about the scope of the AWA's incorporation into ATCP § 16.20(3)(c)(4). As we noted, the operative term in the State regulation is "enclosures," while the referenced portion of the AWA applies broadly to "housing facilities" and separately refers to "enclosures." As I explained in the conference, the well-established rule of statutory construction, which applies with equal force to administrative regulations,<sup>2</sup> holds that if a statute or regulation uses separate terms, those terms have separate meanings.<sup>3</sup> It therefore appears as a legal matter that most of the AWA requirements (those that relate to matters beyond *enclosures*) are generally *not* incorporated into ATCP § 16.20(3)(c)(4). In response to that legal argument, Mr. Boyd stated that he understood this position, but that is not how DATCP interprets the rule. He added, "We know what the intent was of the rule," but neither he nor DATCP legal counsel Mr. Riviera offered any explanation or support for a more expansive interpretation. We would welcome such an explanation for how the reference to "enclosures" incorporates the entirety of AWA's rules for "housing facilities."

Whether as part of our discussion of the AWA, or the subjective/ambiguous requirements like "as often as necessary" or "adequate health care," *see* ATCP §§ 16.20(2)(b) and (2)(e), we emphasized multiple times that Ridgland Farms seeks clarity on how to ensure compliance with each regulation cited in the Notice. This is not an unreasonable request. As a general matter, an

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<sup>2</sup> "Interpretations of code provisions, and the determination as to whether the provision in question is consistent with the applicable statute, are subject to principles of statutory construction." *Orion Flight Servs., Inc. v. Basler Flight Serv.*, 2006 WI 51, ¶ 18, 290 Wis.2d 421, 714 N.W.2d 130 (citing Wis. Stat. § 227.27(1)).

<sup>3</sup> *See, e.g., Sojenhomer LLC v. Vill. of Egg Harbor*, 2024 WI 25, ¶ 18, 412 Wis.2d 244, 7 N.W.3d 455 (citing *Augsburger v. Homestead Mut. Ins. Co.*, 2014 WI 133, ¶ 17, 359 Wis. 2d 385, 856 N.W.2d 874 (explaining that when statutes use different terms, "we generally consider each [term] separately and presume that different words have different meanings"))).

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administrative agency with the power to enforce administrative regulations ought to provide reasonable notice to the regulated community regarding how the agency interprets and intends to enforce those regulations. We left the conference disappointed that DATCP is unwilling or unable to share that information. Ironically, the only objective requirement discussed was the ammonia policy from which Ridgland Farms is exempt, but nevertheless far exceeds. *See supra* at 2. We were encouraged by Mr. Boyd stating that DATCP “can look” and see what guidance documentation might “exist,” although this also suggests that such guidance was not used by DATCP in issuing its Notice to Ridgland Farms in the first place.

### Lack of Guidance on DATCP Interpretation and Compliance

Relatedly, I found it particularly troubling that near the end of the conference, in response to our repeated request for direction on how to comply, Mr. Boyd stated that DATCP’s response to “anyone” who asks is “here are our rules and regulations,” and telling the entity to consult with an attorney because DATCP cannot give “legal advice.” In other words, despite the fact that DATCP has legal authority to declare a regulated entity in violation of the rules, and to authorize an enforcement action on the basis of such alleged violation, DATCP’s position appears to be that providing a regulated entity with DATCP’s interpretation and enforcement parameters regarding its own regulations—namely, what is required for compliance—amounts to the provision of legal advice. By that logic, in the absence of objective measurable standards, Ridgland Farms (or any other regulated entity) must simply guess at what DATCP deems sufficient for compliance. Fundamental issues of due process demand far more.

Stunned by DATCP’s stated logic and the bind in which it leaves the entire regulated community, I cautioned that to the extent this matter is not resolved amicably (our preferred outcome), DATCP would necessarily be required to show in an administrative and/or court proceeding precisely what the highly ambiguous rules in the Notice require for compliance and how Ridgland Farms allegedly failed to comply. We believe it would serve both parties’ interests to know that now, rather than as part of time-consuming and costly litigation.

### Conclusion and Next Steps

As for next steps, we would appreciate receiving a copy of the map of the Ridgland Farms facility used during the conference, as well as any guidance documents currently used by DATCP in relation to the regulations at issue in the Notice. We also look forward to continuing a productive dialogue geared towards addressing DATCP’s concerns and providing guidance to Ridgland Farms regarding compliance. To repeat our position stated during the conference, Ridgland Farms is committed to regulatory compliance and Ridgland Farms believes it is in compliance. If there are changes DATCP believes are needed—changes that are tied to particular standards contained in

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the code—we would be grateful to know what those changes are, and we are hopeful that this matter can be resolved without resorting to litigation.

Very truly yours,

HUSCH BLACKWELL LLP



Eric M. McLeod

cc: Dustin Boyd, Compliance Officer, DATCP ([dustin.boyd@wisconsin.gov](mailto:dustin.boyd@wisconsin.gov))  
Axel F. Candelaria Rivera, Attorney, DATCP ([axel.candelariarivera@wisconsin.gov](mailto:axel.candelariarivera@wisconsin.gov))



State of Wisconsin  
Governor Tony Evers

**Department of Agriculture, Trade and Consumer Protection**  
Secretary Randy Romanski

**EXHIBIT**  
**B**

**EMAIL DELIVERY**  
Case Number: 149309

February 17, 2025

**NOTICE OF ENFORCEMENT CONFERENCE**

Ridglan Farms, Inc.  
10489 W. Blue Mounds Rd.  
Blue Mounds, WI 53517  
524375-DS

Ridglan Farms, Inc:

The Wisconsin Department of Agriculture Trade and Consumer Protection (DATCP) is scheduling an enforcement conference with you to discuss violation(s) of DATCP administrative code rules that were documented by department staff.

**Date of inspection or investigation:**

6/06/2024 and 9/16/2024

**Nature of inspection or investigation:**

Routine Inspection (Case 991707) and Follow-up Inspection (Case 143266)

**Name and title of Animal Health representative conducting investigation:**

Christopher Ondercin (Inspection Services Manager) and Ryan Price (Companion Animal Inspector)

Description of Violation of Concern	Wis. Admin. Code/ Wis. Stats. Reference
Failure to provide daily body, mobility, and behavior checks on dogs (6/06/2024)	Wis. Admin. Code § ATCP 16.20(2)(b)
Failure to provide daily body, mobility, and behavior checks on dogs (9/16/2024)	Wis. Admin. Code § ATCP 16.20(2)(b)

Due to the history and nature of the violation(s), we are requesting that you attend this enforcement conference to discuss potential penalties; these may include civil forfeitures under Wis. Stats. § 95.99, action against your license/registration/certificate, and/or other action as deemed appropriate.

*Failure to attend this conference may result in action against you up to and including being placed on a conditional license, license void, suspension, or revocation, termination of your ability to conduct business in Wisconsin, referral of civil forfeiture(s), or the referral of criminal charges.*

**Enforcement Conference Information**

<b>DATE:</b> Tuesday, February 25, 2025	<b>TIME:</b> 11:30 am
<b>LOCATION:</b> Prairie Oaks State Office Building	<b>ROOM NAME / NUMBER:</b> Hall of Fame Room (1 <sup>st</sup> floor)
<b>ADDRESS:</b> 2811 Agriculture Drive	
<b>CITY/STATE/ZIP:</b> Madison, WI 53708	

If you so choose, you may have legal counsel present during the meeting. Please contact Assistant Legal Counsel Jackie Cuellar with any questions.

Sincerely,



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Colin Benell  
Animal Health Compliance Specialist  
P O Box 8911  
Madison, WI 53708-8911  
Phone: 608-575-3207 Fax: 608-224-4871  
colin.benell@wisconsin.gov

Cc:  
Dustin Boyd, Compliance Officer – WDATCP  
Jackie Cuellar, Assistant Legal Counsel - WDATCP  
Dr. Yvonne Bellay, DVM, Program Manager - WDATCP

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

STATE OF WISCONSIN

Department of Agriculture, Trade & Consumer Protection  
2811 Agriculture Drive  
Madison, WI 53708,

Plaintiff

v.

Ridglan Farms, Inc.  
10489 W. Blue Mounds Rd.  
Blue Mounds, WI 53517,

Defendant.

CASE NO. \_\_\_\_\_

CIVIL FORFEITURE COMPLAINT

The State of Wisconsin, by its attorney \_\_\_\_\_, Assistant District Attorney,

Dane County, Wisconsin, complains against the Defendant herein and alleges that:

JURISDICTION

1. This complaint is filed and these proceedings are instituted under Wis. Stat. § 173.41 and chapter 778 to recover forfeitures, as provided in Wis. Stat. § 173.41(15), for violations of Wis. Admin. Code ch. ATCP 16.
2. The Wisconsin Department of Agriculture, Trade and Consumer Protection ("Department") is a state agency authorized to administer and enforce animal health laws, pursuant to Wis. Stat. ch. 95. The Department is authorized to regulate persons who operate as dog sellers and dog facility operators, pursuant to Wis. Stat. § 173.41, and has adopted dog seller and dog facility operator rules in Wis. Admin. Code ch. ATCP 16.
3. The Division of Animal Health ("Division") is a division of the Department. The Division administers animal health laws and regulates animal health establishments on behalf of the Department, through its Bureau of Field Services.

DEFENDANT

4. Defendant Ridglan Farms, Inc. is located at 10489 W. Blue Mounds Rd, Blue Mounds in Dane County, WI 53517. Defendant operates as a dog breeder. At all times material to this matter, Defendant was subject to Wis. Stat. § 173.41 and Wis. Admin. Code ch(s). ATCP 16.

OFFENSES CHARGED

**Count 1:** On June 6, 2024, Defendant failed to provide a daily body, mobility, and behavior check of a dog. This is a violation of Wis. Admin. Code § ATCP 16.20(2)(b).

**Count 2:** On September 16, 2024, Defendant failed to provide a daily body, mobility, and behavior check of a dog. This is a violation of Wis. Admin. Code § ATCP 16.20(2)(b).

**Count 3:** On September 16, 2024, Defendant failed to provide a daily body, mobility, and behavior check of a dog. This is a violation of Wis. Admin. Code § ATCP 16.20(2)(b).

PENALTY

5. Pursuant to Wis. Stat. § 173.41(15)(b)1, upon conviction of this offense, any person who violates this section or a rule promulgated under this section may be required to forfeit not 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 any subsequent offense within 5 years.

If a violation under subd. 1. involves the keeping of animals, each animal with respect to which the statute or rule is violated constitutes a separate violation.

In addition to the penalties under above, a court may order a person who violates this section to pay the expenses of caring for dogs that are removed from the person's possession because of mistreatment.

### FACTS

On June 6, 2024, department inspectors conducted a routine inspection of the defendant's dog breeding facility at 10489 W. Blue Mounds Road in Blue Mounds, WI.

During the inspection of Building 7, inspectors found an adult, female Beagle (preliminarily identified as ZKA-8 or FZA-8) with an apparent interdigital cyst on the dog's right-front paw. The apparent interdigital cyst appeared to be ruptured. The dog was observed by inspectors to be limping and keeping weight off of the right-front paw. The defendant was unaware of the dog's condition and the dog had not been seen by a veterinarian for the condition.

On September 16, 2024, department inspectors conducted a follow-up inspection of the defendant's dog breeding facility at 10489 W. Blue Mounds Road in Blue Mounds, WI.

During the inspection of Building 7, inspectors found an adult, female Beagle (FVC-O) with an apparent leg injury. The dog was observed by inspectors to be limping and keeping weight off the right-front leg. Inspectors noted that the dog's right-front leg had swelling and there was the presence of two, apparent deep abrasions or puncture wounds. Within the same enclosure an additional adult Beagle (FJA-9) dog was found to have similar wounds on the dog's muzzle. The defendant was unaware of either dog's condition and neither dog had been seen by a veterinarian for the condition.

DEMAND FOR RELIEF

WHEREFORE, the State of Wisconsin demands judgment against Defendant as follows:

1. That the stipulation, executed by and between the parties, be approved and made part of the Judgment in this proceeding.
2. Pursuant to Wis. Stat. § 173.41(15), the Defendant pay a civil forfeiture to the Plaintiff, State of Wisconsin, in the amount of \$1,050.00 plus statutory surcharges and fees for the violations alleged in this complaint.
3. Granting any other such relief as the Court determines to be appropriate.

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

Signed: \_\_\_\_\_

Name: \_\_\_\_\_

Dane County Assistant District Attorney

State Bar No. \_\_\_\_\_

215 S. Hamilton St. #3000

Madison, WI 53703

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

**STATE OF WISCONSIN**

Department of Agriculture, Trade & Consumer Protection  
2811 Agriculture Drive  
Madison, WI 53708,

Plaintiff

v.

Ridglan Farms, Inc.  
10489 W. Blue Mounds Rd.  
Blue Mounds, WI 53517,

Defendant.

CASE NO. \_\_\_\_\_

**CIVIL FORFEITURE STIPULATION**

The parties stipulate as follows:

1. Defendant Ridglan Farms, Inc. is located at 10489 W. Blue Mounds Rd, Blue Mounds in Dane County, WI 53517. Defendant operates as a dog breeder. Defendant is licensed by the State of Wisconsin Department of Agriculture, Trade and Consumer Protection, license number 267262-DS. At all times material to this matter, Defendant was subject to Wis. Admin. Code ch(s). ATCP 16.
2. The Wisconsin Department of Agriculture, Trade and Consumer Protection ("Department") administers animal health laws, pursuant to Wis. Stat. ch. 95. The Department licenses/regulates dog sellers and dog facility operators, pursuant to Wis. Stat. § 173.41 and has adopted dog seller and dog facility operator rules in Wis. Admin. Code ch(s) ATCP 16. The penalties for violating the aforementioned animal health laws are defined under Wis. Stat. § 173.41(15) with provision for fines, forfeitures and imprisonment.

3. The Division of Animal Health (“Division”) is a division of the Department. The Division administers animal health laws and regulates animal health establishments on behalf of the Department, through its Bureau of Field Services.
4. Defendant consents to the jurisdiction of this court and the subject matter.
5. The parties consent to the entry of the attached Judgment and Order without the filing and service of a summons and without further notice, appearance or consent of the parties. Defendant waives all jurisdictional and substantive defenses to the entry of judgment and consents to the entry of judgment without trial, adjudication, or findings on any issues of fact or law.
6. Defendant does not contest three (3) counts of violating Wis. Admin. Code § ATCP 16.20(2)(b), more particularly identified in the attached Civil Forfeiture Complaint, incorporated herein by reference.
7. This Stipulation constitutes an agreement between the parties concerning the violations found in the attached Civil Forfeiture Complaint. Defendant agrees to pay a civil forfeiture together with applicable fees and surcharges as provided in the attached Judgment and Order. Defendant agrees to pay \$1,556.50 by check or money order payable to the Dane County Clerk of Court within 30 days of the signed Judgment and Order.
8. By signing this Stipulation, the Defendant waives the right to trial on the charges in the attached Civil Forfeiture Complaint and consents to the entry of the attached Judgment and Order by the Court.
9. This Order may be executed in multiple originals, which together shall constitute a single document. The parties agree to accept a handwritten signature or an electronic signature that complies with Wis. Stat. ch. 137 to execute this Order.

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

By: \_\_\_\_\_

for Ridglan Farms, Inc.

Title: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

Phone Number: \_\_\_\_\_

FOR THE WISCONSIN DEPARTMENT OF AGRICULTURE, TRADE AND CONSUMER PROTECTION:

By: \_\_\_\_\_ Date: \_\_\_\_\_

Darlene M. Konkle, DVM, MS, DACVIM  
State Veterinarian and Administrator, Division of Animal Health  
Wisconsin Department of Agriculture, Trade and Consumer Protection  
2811 Agriculture Drive  
P.O. Box 8911  
Madison, Wisconsin 53708-8911

FOR THE STATE OF WISCONSIN:

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

Signed: \_\_\_\_\_

Name: \_\_\_\_\_

Dane County Assistant District Attorney

State Bar No. \_\_\_\_\_

215 S. Hamilton St. #3000

Madison, WI 53703

STATE OF WISCONSIN	CIRCUIT COURT	DANE COUNTY
<p><b>STATE OF WISCONSIN</b>            Department of Agriculture, Trade &amp; Consumer Protection            2811 Agriculture Drive            Madison, WI 53708,</p> <p style="text-align: center;">Plaintiff</p> <p>v.</p> <p>Ridglan Farms, Inc.            10489 W. Blue Mounds Rd.            Blue Mounds, WI 53517,</p> <p style="text-align: center;">Defendant.</p>	<p>CASE NO. _____</p> <p><b>CIVIL FORFEITURE            JUDGMENT AND ORDER</b></p>	

Upon the attached Stipulation of the parties, IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:

1. Pursuant to Wis. Stat. § 173.41(15), Defendant shall pay a civil forfeiture and all applicable assessments and fees to the Dane County Clerk of Court for the violation(s) alleged in the complaint in this matter. The total amount of the forfeiture consists of the sum of the following:

Three violations of Wis. Admin. Code § ATCP 16.20(2)(b) at \$350.00 per violation: \$1,050.00

**Sub-total of all civil forfeitures**

**\$1,050.00**

Surcharges and fees as follows:

a. Jail surcharge under Wis. Stat. § 302.46(1) at \$10/count	\$30.00
b. Crime laboratories and drug law enforcement surcharge under Wis. Stat. § 165.755(1)(a) at \$13/count	\$39.00
c. Penalty surcharge under Wis. Stat. § 757.05(1) (26% of civil forfeiture sub-total)	\$273.00
d. Court costs for forfeiture actions under Wis. Stat. § 814.63(1)(b) at \$25/count	\$75.00
e. Court support services fee under Wis. Stat. § 814.85(1)	\$68.00
f. Justice information system fee under Wis. Stat. § 814.86(1)	\$21.50
<b>Sub-total of all surcharges and fees</b>	<b>\$506.50</b>
<b>TOTAL for all counts and associated costs</b>	<b>\$1,556.50</b>

2. Defendant shall pay **\$1,556.50** upon entry of judgment. Defendant shall pay by check or money order payable to the Dane County Clerk of Courts within 30 days of the date of this signed order.

3. The Clerk of Courts shall mail a copy of this Judgment and Order, by first class mail, to Defendant Ridglan Farms, Inc, 10489 W. Blue Mounds Rd, Blue Mounds, WI 53517 and to Defendant's legal counsel.

Signed at Madison, Wisconsin, this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

**BY THE COURT:**

\_\_\_\_\_  
Circuit Court Judge



USDA-APHIS-Animal Care

EXHIBIT C



ANIMAL WELFARE COMPLAINT			
Complaint No. AC25-0264	Date Entered: January 3, 2025	Processed By: Amy Benson	
Referred To: LYNNE WHITE-SHIM		Reply Due: February 17, 2025	
Facility or Person Complaint Filed Against			
Name: Ridglan Farms Inc		Customer No.: 769	License No.:
Address: PO Box 318		Email Address:	
City: Mount Horeb	State: WI	Phone No.: (608) 437-8670	
Complainant Information			
Name: (b) (6), (b) (7)(C), (b) (7)(D)		Organization:	
Address:		Email Address: (b) (6), (b) (7)(C), (b) (7)(D)	
City:	State:	Phone No.:	
How was the Complaint received? Email			
Details of Complaint: See attached.			
Results: On 1/22/2025 Dr. Waldrop and I conducted a routine unannounced inspection of the facility and the animals housed there. The submitted <i>complaint concerns will be in italics</i> below and inspection findings summarized after each concern.  <i>Untreated wounds (concern)</i> We observed that the facility timely identifies and was following established treatment procedures for some minor conditions in dogs. The majority of dogs at the facility were in good health and didn't need to be under any medical treatment. Treatments are overseen by an on-site Attending Veterinarian. The facility located FVC-0 and I observed FVC-0's behavior with the dog it was housed with at time of inspection (not housed with FJA-9 anymore, facility reported FJA-9 was no longer at the facility). Observations suggested compatible behaviors. There were no signs of aggression and no wounds on either dog observed. The facility representative got FVC-0 out of the enclosure and I felt both front legs with gloved hands, both lacked any thickening of skin, scarring, and had normal full hair coat (no missing spots of hair) on legs and lacked any signs of any ongoing healing or previous deep serious wound; suggesting that the wound observed in Sept 2024 has completely resolved as far as visual observations can tell. As indicated in the complaint concerns, the facility representative had also communicated that the wound was treated by personnel once identified. The facility located ZKA-8 and FZA-8 (which were housed in different enclosures). The facility representative removed each from the enclosure. On both dogs I observed front paws and touched			



## USDA-APHIS-Animal Care



between the toes with gloved hands; the areas lacked any thickening or swelling between the toes. If either of these had a lesion in the past, inspection observations suggest that the condition was resolved. We did observe that the facility had a system of actively identifying other dogs with foot lesions and were treating per the AV-approved protocol and also monitored dogs under treatment for resolution or could get closer evaluation by the AV.

*(Concern) Non-sterile cherry eye procedures,*

We asked the facility representative about the procedure for correcting 'cherry eyes.' The procedure was described and we also saw that it is an approved standard procedure at the facility. The procedure is more of a minor surgical procedure and the AV reported that an effective topical anesthesia is used and it is being done in accordance with the approved procedure only by trained individuals without complications or signs of pain and the AV has the option of using injectable sedation/additional anesthesia if signs suggest the topical anesthesia would not be sufficient.

*(Concern) Poor ventilation*

The facility's buildings were observed to meet requirements for compliance with AWA 3.2(b)/3.3(b):

-The dogs were observed to have normal health and behavior and the AV reported they haven't had outbreaks of respiratory diseases (respiratory disease would be a supporting sign of poor ventilation).

-We observed odors were reasonable for each building. The AWA does not require that odors are absent but minimized.

-Ventilation was being provided by mechanical vents that the facility representative said have been calculated for acceptable air-room exchange rates to maintain acceptable air quality.

-The buildings did not have drafts of cold fresh air entering in animal housing areas that we observed.

-Facility monitor and record ammonia levels in buildings and levels were typically around 2-3ppm, one area had 7ppm, which would be cleaned the next day and seemed a reasonable cleaning schedule. The AV said current guidance to personnel is that anything 10ppm or above is an indication for prompt action on adjusting ventilation and cleaning action to reduce ammonia. The AWA does not set an objective ammonia level, however we observed that the facility actively monitors and has ventilation in place to minimize ammonia levels as required.

-We did not observe signs that humidity levels were causing any discomfort in dogs during inspection.

*(Concern) Failure to Provide Adequate Veterinary Care*

The facility reported that each building has a stand-alone task of daily observations of each dog completed by personnel and some buildings have personnel complete the daily observations multiple times in a day. The facility has established treatment protocols that trained personnel can initiate for common minor conditions and the AV is on site to oversee and adjust treatments as necessary. The representative also said that each employee is watching and paying attention to dog health and behavior as they complete other husbandry tasks, however daily observations is a stand-alone task to ensure attention can be dedicated to observing each dog daily.

*(Concern) Compatibility Among Co-Housed Dogs*

The AV described the steps and observations they make to ensure compatibility of different dogs and age groups throughout the facility. The AV said that FVC-0 and FJA-9 were separated once the wounds had been observed. Facility-wide, dogs that were pair-housed or group housed were observed to have normal non-aggressive behavior toward each other. The AV said compatibility is something



# USDA-APHIS-Animal Care



that is monitored daily and described appropriate adjustments in groups and pairs that are made as any signs of incompatibility arise.

*(Concern) Failure to ensure proper drainage and waste disposal and operation of drainage systems [which are] jeopardizing the health and well-being of dogs at the facility.*

We observed the facility has a regular and reasonable schedule of waste removal and drainage to be in compliance with 3.1(f). Dogs overall were observed to be in general good health and the AV reported that they haven't had respiratory sickness outbreaks (respiratory sickness could indicate poor waste removal and poor air quality). The regular removal minimizes disease risks, minimizes odors, and dogs were observed to be clean and dry throughout the facility. The flushing schedule of the pans under primary enclosures and floor areas was determined to be reasonable and also compliant with 3.11(a). We did see areas in trays that retained water in some buildings that had been cleaned and flushed prior to our inspection, however the retained water in the pans was clear and the surface at the bottom of the pooling could be visualized, suggesting that the retained water was clean and that the previous flushing process had sufficiently flushed out any waste that had been in that low area prior to the flushing.

*(Concern) Dogs are not receiving positive human contact and socialization daily.*

The facility has an exercise program approved by the AV that we observed they were following. Their plan meets and exceeds AWA 3.8 requirements. The AWA does not use the term 'socialization' as a requirement for dogs; however 3.8(c)(2) indicates if a dog is housed in a facility where it does not have sensory contact with another dog, then it is required to have positive physical human contact with humans at least daily. Dogs throughout were observed to have sensory contact with other dogs; most commonly being housed in compatible groups/pairs. Dogs not housed in pairs/groups were confirmed to have more than twice the required AWA floor space, housed in areas where they can see, smell, hear, and many times still touch (through enclosure dividers) other dogs. We observed employees positively interacting with dogs whose main daily job was to socialize dogs with positive human contact. In general dogs in the facility had behaviors of dogs that suggest they are routinely getting positive human attention. Dogs were appropriately inquisitive and interactive with us (strangers to them) when walking by them. When holding a hand out most would be inquisitive and curious and want to get closer; (the opposite and sign of poor socialization would be dogs cowering and not wanting to approach us or even look at us, which these were not the signs observed of the dogs at the facility during inspection). Although not an AWA requirement; we also observed the facility had items of enrichment provided in dog enclosures.

Application Kit Provided:

Yes:      No:

Inspector:  
SCOTT WELCH

Date:  
February 4, 2025

Reviewed By:  
LYNNE WHITE-SHIM

Date:  
February 18, 2025



## Inspection Report

---

Ridglan Farms Inc  
PO Box 318  
Mount Horebm, WI 53572

Customer ID: **769**  
Certificate: **35-A-0009**  
Site: 001  
Ridglan Farms Inc

Type: ROUTINE INSPECTION  
Date: 22-JAN-2025

---

No non-compliant items identified during this inspection.

This inspection and exit interview were conducted with facility representatives.

Additional Inspectors:

Brianna Waldrop, VETERINARY MEDICAL OFFICER

---

**Prepared By:** SCOTT WELCH  
USDA, APHIS, Animal Care  
**Title:** VETERINARY MEDICAL OFFICER

**Date:**  
23-JAN-2025

**Received by Title:** Facility Representative

**Date:**  
23-JAN-2025



### Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
769	35-A-0009	001	Ridglan Farms Inc	22-JAN-2025

Count	Scientific Name	Common Name
001828	<i>Canis familiaris</i>	DOG ADULT
000811	<i>Canis familiaris</i>	DOG PUPPY
002639	<b>Total</b>	



State of Wisconsin  
Governor Tony Evers

**Department of Agriculture, Trade and Consumer Protection**  
Secretary Randy Romanski

August 11, 2025

**EXHIBIT  
D**

**EMAIL DELIVERY**  
Case Number: 149309

**NOTICE OF ENFORCEMENT CONFERENCE**

Ridglan Farms, Inc.  
10489 W. Blue Mounds Rd.  
Blue Mounds, WI 53517  
524375-DS

Ridglan Farms, Inc:

The Wisconsin Department of Agriculture Trade and Consumer Protection (DATCP) is scheduling an enforcement conference with you to discuss violation(s) of DATCP administrative code rules that were documented by department staff.

**Date of inspection or investigation:**

6/06/2024, 9/16/2024

**Nature of inspection or investigation:**

Routine Inspection (Case 991707) and Follow-up Inspection (Case 143266)  
Dog Seller & Dog Facility Operators compliance case (149309)

**Name and title of Animal Health representative conducting investigation:**

Christopher Ondercin (Inspection Services Manager) and Ryan Price (Companion Animal Inspector)  
Colin Benell (Compliance Specialist)

Description of Violation of Concern	Wis. Admin. Code/ Wis. Stats. Reference
Failure to provide daily body, mobility, and behavior checks on dogs (6/06/2024)	Wis. Admin. Code § ATCP 16.20(2)(b)
Failure to provide daily body, mobility, and behavior checks on dogs (9/16/2024)	Wis. Admin. Code § ATCP 16.20(2)(b)
Failure to handle dogs in a humane manner that may cause harm or unnecessary injury (2022 – 2025)	Wis. Admin. Code § ATCP 16.20(2)(a)

Due to the history and nature of the violation(s), we are requesting that you attend this enforcement conference to discuss potential penalties; these may include civil forfeitures under Wis. Stats. § 95.99, action against your license/registration/certificate, and/or other action as deemed appropriate.

*Failure to attend this conference may result in action against you up to and including being placed on a conditional license, license void, suspension, or revocation, termination of your ability to conduct business in Wisconsin, referral of civil forfeiture(s), or the referral of criminal charges.*

**Enforcement Conference Information**

<b>DATE:</b>	Wednesday, September 3, 2025	<b>TIME:</b>	10:30 am
<b>LOCATION:</b>	Prairie Oaks State Office Building	<b>ROOM NAME / NUMBER:</b>	Hall of Fame Room (1 <sup>st</sup> floor)
<b>ADDRESS:</b>	2811 Agriculture Drive		
<b>CITY / STATE / ZIP:</b>	Madison, WI 53708		

If you so choose, you may have legal counsel present during the meeting. Please contact Assistant Legal Counsel Jackie Cuellar with any questions.

Sincerely,



---

Colin Benell  
Animal Health Compliance Specialist  
P O Box 8911  
Madison, WI 53708-8911  
Phone: 608-575-3207 Fax: 608-224-4871  
colin.benell@wisconsin.gov

Cc:  
Dustin Boyd, Compliance Officer – Wisconsin DATCP  
Jackie Cuellar, Assistant Legal Counsel – Wisconsin DATCP  
Dr. Yvonne Bellay, DVM, Program Manager – Wisconsin DATCP

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

STATE OF WISCONSIN

Department of Agriculture, Trade & Consumer Protection  
2811 Agriculture Drive  
Madison, WI 53708,

Plaintiff

CASE NO. \_\_\_\_\_

CIVIL FORFEITURE STIPULATION

v.

Ridglan Farms, Inc.  
10489 W. Blue Mounds Rd.  
Blue Mounds, WI 53517,

Defendant.

The parties stipulate as follows:

1. Defendant Ridglan Farms, Inc. is located at 10489 W. Blue Mounds Rd, Blue Mounds in Dane County, WI 53517. Defendant operates as a dog breeder. Defendant is licensed by the State of Wisconsin Department of Agriculture, Trade and Consumer Protection, license number 267262-DS. At all times material to this matter, Defendant was subject to Wis. Admin. Code ch(s). ATCP 16.
2. The Wisconsin Department of Agriculture, Trade and Consumer Protection ("Department") administers animal health laws, pursuant to Wis. Stat. ch. 95. The Department licenses/regulates dog sellers and dog facility operators, pursuant to Wis. Stat. § 173.41 and has adopted dog seller and dog facility operator rules in Wis. Admin. Code ch(s) ATCP 16. The penalties for violating the aforementioned animal health laws are defined under Wis. Stat. § 173.41(15) with provision for fines, forfeitures and imprisonment.

3. The Division of Animal Health (“Division”) is a division of the Department. The Division administers animal health laws and regulates animal health establishments on behalf of the Department, through its Bureau of Field Services.
4. Defendant consents to the jurisdiction of this court and the subject matter.
5. The parties consent to the entry of the attached Judgment and Order without the filing and service of a summons and without further notice, appearance or consent of the parties. Defendant waives all jurisdictional and substantive defenses to the entry of judgment and consents to the entry of judgment without trial, adjudication, or findings on any issues of fact or law.
6. Defendant does not contest 308 counts of violating Wis. Admin. Code § ATCP 16.20(2)(a) and three (3) counts of violating Wis. Admin. Code § ATCP 16.20(2)(b), more particularly identified in the attached Civil Forfeiture Complaint, incorporated herein by reference.
7. This Stipulation constitutes an agreement between the parties concerning the violations found in the attached Civil Forfeiture Complaint. Defendant agrees to pay a civil forfeiture together with applicable fees and surcharges as provided in the attached Judgment and Order. Defendant agrees to pay \$55,148.50 by check or money order payable to the Dane County Clerk of Court within 30 days of the signed Judgment and Order.
8. By signing this Stipulation, the Defendant waives the right to trial on the charges in the attached Civil Forfeiture Complaint and consents to the entry of the attached Judgment and Order by the Court without service or filing of a summons and without further notice, appearance, or consent.

9. The Judgment and Order accompanying this Stipulation will be a final and appealable order. The Order may be entered incorporating the terms of this Stipulation without further notice, and the Judgment may be docketed pursuant to Wis. Stat. § 806.10(1).
10. No costs shall be awarded to any party upon entry of the Judgment.
11. This Order may be executed in multiple originals, which together shall constitute a single document. The parties agree to accept a handwritten signature or an electronic signature that complies with Wis. Stat. ch. 137 to execute this Order.
12. In witness hereof, the parties have executed or caused to be executed this Stipulation and do hereby represent and warrant that their respective signatory, whose signature appears below, has been and is, on the date of this Stipulation, duly authorized to execute this Stipulation.

DRAFT

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

Signed By: \_\_\_\_\_  
for Ridglan Farms, Inc.

Printed: \_\_\_\_\_

Title: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

Phone Number: \_\_\_\_\_

Approved By: \_\_\_\_\_ Date: \_\_\_\_\_  
Attorney Signature

Print Name: \_\_\_\_\_

State Bar No.: \_\_\_\_\_

Law Firm Address: \_\_\_\_\_

Law Firm Phone Number: \_\_\_\_\_

FOR THE WISCONSIN DEPARTMENT OF AGRICULTURE, TRADE AND CONSUMER PROTECTION:

By: \_\_\_\_\_ Date: \_\_\_\_\_

Darlene M. Konkle, DVM, MS, DACVIM  
State Veterinarian and Administrator, Division of Animal Health  
Wisconsin Department of Agriculture, Trade and Consumer Protection  
2811 Agriculture Drive  
P.O. Box 8911  
Madison, Wisconsin 53708-8911

FOR THE STATE OF WISCONSIN:

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

Signed: \_\_\_\_\_

Name: \_\_\_\_\_  
Dane County Assistant District Attorney  
State Bar No. \_\_\_\_\_  
215 S. Hamilton St. #3000  
Madison, WI 53703

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

STATE OF WISCONSIN

Department of Agriculture, Trade & Consumer Protection  
2811 Agriculture Drive  
Madison, WI 53708,

Plaintiff

v.

Ridglan Farms, Inc.  
10489 W. Blue Mounds Rd.  
Blue Mounds, WI 53517,

Defendant.

CASE NO. \_\_\_\_\_

CIVIL FORFEITURE COMPLAINT

The State of Wisconsin, by its attorney \_\_\_\_\_, Assistant District Attorney, Dane County, Wisconsin, brings this civil action against the above-named on behalf of the Wisconsin Department of Agriculture, Trade and Consumer Protection (“Department”). The Department is a state agency authorized to administer and enforce animal health laws, pursuant to Wis. Stat. ch. 95. The Department is authorized to regulate persons who operate as dog sellers and dog facility operators, pursuant to Wis. Stat. § 173.41, and has adopted dog seller and dog facility operator rules in Wis. Admin. Code ch. ATCP 16. The Division of Animal Health (“Division”) is a division of the Department. The Division administers animal health laws and regulates animal health establishments on behalf of the Department, through its Bureau of Field Services.

PARTIES

1. Plaintiff, State of Wisconsin (“Plaintiff”) is a sovereign state of the United State of America, with its principal offices at the State Capitol in Madison, Wisconsin.
2. Defendant, Ridglan Farms, Inc. (“Defendant”) is located at 10489 W. Blue Mounds Rd, Blue Mounds in Dane County, WI 53517. Defendant operates as a dog breeder. At all

times material to this matter, Defendant was subject to Wis. Stat. § 173.41 and Wis. Admin. Code ch. ATCP 16.

### JURISDICTION AND VENUE

3. This complaint is filed and these proceedings are instituted under Wis. Stat. § 173.41 and ch. 778 to recover forfeitures, as provided in Wis. Stat. § 173.41(15), for violations of Wis. Admin. Code ch. ATCP 16.
4. Personal jurisdiction over the Defendant is present pursuant to Wis. Stat. § 801.05(3) because the acts or omissions giving rise to the Plaintiff's claims took place within the State of Wisconsin.
5. Venue is proper in Dane County because the acts or omissions giving rise to Plaintiff's claims took place in Dane County.

### OFFENSES CHARGED

**Count 1 - 308:** On and between February 7, 2022 and February 22, 2025, Defendant failed to handle a dog as carefully as practicable and in a humane manner that does not cause physical harm or unnecessary injury. This is in violation of Wis. Admin. Code § ATCP 16.20(2)(a).

**Count 309:** On June 6, 2024, Defendant failed to provide a daily body, mobility, and behavior check of a dog. This is a violation of Wis. Admin. Code § ATCP 16.20(2)(b).

**Count 310 - 311:** On September 16, 2024, Defendant failed to provide a daily body, mobility, and behavior check of two dogs. This is a violation of Wis. Admin. Code § ATCP 16.20(2)(b).

PENALTY

6. Pursuant to Wis. Stat. § 173.41(15)(b)1., upon conviction of this offense, any person who violates this section or a rule promulgated under this section may be required to forfeit not 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 any subsequent offense within 5 years.
7. If a violation under subd. 1. involves the keeping of animals, each animal with respect to which the statute or rule is violated constitutes a separate violation. See Wis. Stat. § 173.41(15)(b)2. In addition to the penalties above, a court may order a person who violates this section to pay the expenses of caring for dogs that are removed from the person's possession because of mistreatment. See Wis. Stat. § 173.41(15)(c).

FACTS

8. On June 6, 2024, Department inspectors conducted a routine inspection of the Defendant's dog breeding facility at 10489 W. Blue Mounds Road in Blue Mounds, WI. During the inspection of Building 7, inspectors found an adult, female Beagle (preliminarily identified as ZKA-8 or FZA-8) with an apparent interdigital cyst on the dog's right-front paw. The apparent interdigital cyst appeared to be ruptured. The dog was observed by inspectors to be limping and keeping weight off of the right-front paw. The Defendant was unaware of the dog's condition and the dog had not been seen by a veterinarian for the condition. While the Defendant claimed the condition hadn't been noticed by staff yet *that*

day, a cyst would require more than 24 hours to develop and subsequently rupture, indicating that the condition had gone unnoticed for at least a full day.

9. On September 16, 2024, Department inspectors conducted a follow-up inspection of the Defendant's dog breeding facility at 10489 W. Blue Mounds Road in Blue Mounds, WI. During the inspection of Building 7, inspectors found an adult, female Beagle (FVC-O) with an apparent leg injury. The dog was observed by inspectors to be limping and keeping weight off the right-front leg. Inspectors noted that the dog's right-front leg had swelling and there was the presence of two apparent, deep abrasions or puncture wounds. Within the same enclosure an additional adult Beagle (FJA-9) dog was found to have similar wounds on the dog's muzzle. Injuries on both dogs were partially healed including scabbing, indicating the injuries were present for at least 24 hours or more. The Defendant was unaware of either dog's condition and neither dog had been seen by a veterinarian for the condition.
10. On February 5, 2025, Wisconsin Veterinary Examining Board (VEB) staff conducted an inspection of the veterinary care practices of staff at the Defendant's facility. During this inspection and interviews with the Defendant's staff, it was found that the Defendant was conducting various surgical procedures on dogs kept within facilities that were subject to Wis. Stat. § 173.41 and Wis. Admin. Code ch. ATCP 16. Based upon admissions by several facility employees who had been directly involved, VEB staff found that the Defendant had been routinely performing nictitans gland prolapse, also known as "cherry eye," surgeries to remove the prolapsed gland on dogs for several years. During the performance of these surgeries, dogs were not given proper anesthetics (or, not given anesthetics at all), nor was proper post-operative care provided.

11. According to the VEB, board-certified veterinary ophthalmologists, and current veterinary medicine educational materials, nictitans gland prolapse surgeries require both a local and general anesthetic prior to the operation along with post-operative pain control and follow-up checks. During the inspection, employees directly involved with the surgeries explained that no anesthetics are given, no pain control is administered, no post-surgical care is administered and there are no follow-up checks. Medical records requested by the Department and provided by the Defendant support the aforementioned employee's statements. In a statement made to the VEB by the managing veterinarian (Dr. Richard Van Domelen) at Defendant's dog breeding facility, he stated that on occasion a topical eye drop is administered prior to the surgery. However, this drop is not sufficient as it only numbs the cornea but not the soft tissue of the nictitans gland. Additionally, according to Van Domelen and the aforementioned employees, the surgeries at this facility are routinely performed by untrained individuals without the proper and required education. Pursuant to Wis. Stat. § 89.05(1) and Wis. Admin. Code § VE 1.44(2)(c), veterinary surgery may only be performed by a Doctor of Veterinary Medicine who is licensed in Wisconsin. For the violations described in this complaint, Defendant does not qualify for any Wisconsin State Statute or Wisconsin Administrative Code exemptions.

12. The surgery method of removing the prolapsed nictitans gland has been considered malpractice by the veterinary community since at least 1991. From *Veterinary Ophthalmology 2nd Ed. 1991 Nictitans Gland Procedure Guide*, "The importance of returning the gland to its normal position cannot be overstated. Several of the dog breeds predisposed to cherry eye are also prone to develop tear insufficiency disease. Removal of the complete prolapsed gland could precipitate development of keratoconjunctivitis

*sicca. Removal of the entire nictitans for nictitans gland prolapse or cherry eye is flagrant malpractice.”*

13. Between May 8, 2025 and May 23, 2025, the Department identified by random selection three Wisconsin licensed veterinarians who are board-certified ophthalmologists. Each veterinarian explained that in most cases it would be inappropriate to remove the nictitans gland, and if done, the dog would require lifelong daily treatment of tear stimulant eye drops. According to medical records provided by Defendant, Defendant does not treat the animals in question with tear stimulant drops.
14. Records provided by the Defendant to the Department demonstrated that the Defendant performed the improper “cherry eye” procedures on at least 308 dogs since 2022, causing physical harm and unnecessary injury.

#### DEMAND FOR RELIEF

WHEREFORE, the State of Wisconsin demands judgment against Defendant as follows:

15. That the stipulation, executed by and between the parties, be approved and made part of the Judgment in this proceeding.
16. Pursuant to Wis. Stat. § 173.41(15), the Defendant pay a civil forfeiture to the Plaintiff, State of Wisconsin, in the amount of \$31,850.00 plus statutory surcharges and fees for the violations alleged in this complaint.
17. Granting any other such relief as the Court determines to be appropriate.

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

Signed: \_\_\_\_\_

Name: \_\_\_\_\_

Dane County Assistant District Attorney

State Bar No. \_\_\_\_\_

215 S. Hamilton St. #3000

Madison, WI 53703

DRAFT

STATE OF WISCONSIN	CIRCUIT COURT	DANE COUNTY
<p><b>STATE OF WISCONSIN</b>            Department of Agriculture, Trade &amp; Consumer Protection            2811 Agriculture Drive            Madison, WI 53708,</p> <p style="text-align: center;">Plaintiff</p> <p>v.</p> <p>Ridglan Farms, Inc.            10489 W. Blue Mounds Rd.            Blue Mounds, WI 53517,</p> <p style="text-align: center;">Defendant.</p>	<p>CASE NO. _____</p> <p><b>CIVIL FORFEITURE            JUDGMENT AND ORDER</b></p>	

Upon the attached Stipulation of the parties, IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:

1. Pursuant to Wis. Stat. § 173.41(15), Defendant shall pay a civil forfeiture and all applicable assessments and fees to the Dane County Clerk of Court for the violation(s) alleged in the complaint in this matter. The total amount of the forfeiture consists of the sum of the following:
 

308 violations of Wis. Admin. Code § ATCP 16.20(2)(a) at \$100 per violation:	\$30,800.00
Three (3) violations of Wis. Admin. Code § ATCP 16.20(2)(b) at \$350 per violation:	\$1,050.00
<b>Sub-total of all civil forfeitures</b>	<b>\$31,850.00</b>

Surcharges and fees as follows:

a. Jail surcharge under Wis. Stat. § 302.46(1) at \$10/count	\$3,110.00
b. Crime laboratories and drug law enforcement surcharge under Wis. Stat. § 165.755(1)(a) at \$13/count	\$4,043.00
c. Penalty surcharge under Wis. Stat. § 757.05(1) (26% of civil forfeiture sub-total)	\$8,281.00
d. Court costs for forfeiture actions under Wis. Stat. § 814.63(1)(b) at \$25/count	\$7,775.00
e. Court support services fee under Wis. Stat. § 814.85(1)	\$68.00
f. Justice information system fee under Wis. Stat. § 814.86(1)	\$21.50
<b>Sub-total of all surcharges and fees</b>	<b>\$23,298.50</b>
<b>TOTAL for all counts and associated costs</b>	<b>\$55,148.50</b>

2. Defendant shall pay **\$55,148.50** upon entry of judgment. Defendant shall pay by check or money order payable to the Dane County Clerk of Courts within 30 days of the date of this signed order.

3. This Judgment and Order is final and is intended by the Court to be an appealable order within the meaning of Wis. Stat. § 808.03(1).

4. The Clerk of Courts shall mail a copy of this Judgment and Order, by first class mail, to Defendant Ridglan Farms, Inc, 10489 W. Blue Mounds Rd, Blue Mounds, WI 53517 and to Defendant's legal counsel.

Signed at Madison, Wisconsin, this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

**BY THE COURT:**

\_\_\_\_\_  
Circuit Court Judge