

EXHIBIT A

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

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>STATE OF WISCONSIN Department of Agriculture, Trade & Consumer Protection 2811 Agriculture Drive Madison, WI 53708,</p> <p style="text-align: center;">Plaintiff</p> <p style="text-align: center;">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 style="text-align: center;">CIVIL FORFEITURE JUDGMENT AND ORDER</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

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

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
Sub-total of all surcharges and fees	\$23,298.50
TOTAL for all counts and associated costs	\$55,148.50

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