

IN THE CIRCUIT COURT OF WISCONSIN

DANE COUNTY

PEOPLE OF THE STATE OF
WISCONSIN,

v.

RIDGLAN FARMS,

Defendant.

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CRIMINAL COMPLAINT

The below-named complaining witness being first duly sworn states the following:

COUNT 1: MISTREATING AN ANIMAL — §§ 951.02 and 951.18(1) (Surgical mutilation without anesthetics or veterinary supervision)

The defendant Ridglan Farms beginning at least on April 17, 2017 and through the present day, regularly performs surgical procedures on animals, such as the so-called “cherry eye surgery,” without anesthetics or veterinary supervision. On or around January 10, 2021, defendant had in place a company policy in which employees, with no training and within days of arriving on the job, are required to participate in surgical procedures described by an employee as a “blood bath,” in which a dog is forcibly restrained and has glands cut out of their eye without any painkillers or veterinary supervision. This policy, which has been described by veterinarians as “shocking,” is just one of numerous surgical mutilations performed on Ridglan dogs in direct contradiction to normal and accepted veterinary practices, including the so-called devocalization of dogs – the mutilation of their vocal cords – which has been condemned by

veterinary organizations for its “negative impacts on animal welfare” and for causing “significant risks and complications, including pain.” Defendant’s unlawful actions were taken in violation of Wis. Stats. 951.02, which states that “No person may treat any animal, whether belonging to the person or another, in a cruel manner.” They further constitute a felony under 951.18(1) because they result in “the mutilation, disfigurement, or death of an animal.”

COUNT 2: MISTREATING AN ANIMAL — §§ 951.02 and 951.14(3)(b)

(Confinement-induced psychological torment)

The defendant Ridglan Farms beginning at least on October 26, 2016 and through the present day, confines animals in small metal enclosures, often in solitary confinement, to the point that many animals are in a state of psychological torment, and exhibiting signs of extreme stress, such as circling, pacing, and wall bouncing. On October 26, 2016 an inspector with the Wisconsin Department of Agriculture, during a routine inspection, noted, “A number of adult dogs in the facility were displaying prominent stereotypical behaviors; such as: circling, pacing, and wall bouncing” and also that “Efforts should be taken to address dog’s abnormal, stereotypical behaviors. Such behaviors are an indicator of the dog’s welfare.” The defendant did not address these findings and, on April 17, 2017, animal rights activists observed exactly the same problem: numerous dogs spinning in cages or exhibiting other forms of stereotypical, repetitive behaviors, including a blind beagle puppy who was spinning in a circle for two hours in a solitary cage. An employee at Ridglan Farms noted the conditions persisted in 2021-2022, and there have been no material changes to the confinement practices at Ridglan Farms since that date. Dogs remain trapped in small metal cages, without access to the outdoors or adequate space, and many develop abnormal behaviors due to the torment and isolation they endure.

Defendant's unlawful actions were taken in violation of Wis. Stats. 951.02, which states that "No person may treat any animal, whether belonging to the person or another, in a cruel manner." They further violate 951.14(3)(b) which provides, "Enclosures shall be constructed and maintained so as to provide sufficient space to allow each animal adequate freedom of movement. Inadequate space may be indicated by evidence of debility, stress or abnormal behavior patterns."

COUNT 3: MISTREATING AN ANIMAL — §§ 951.02 and ATCP 16.22(1)(b)
(Intentionally or negligently causing infection and injury)

The defendant Ridglan Farms beginning at least on October 26, 2016 and through the present day, intentionally or negligently causes serious ailments and infections to beagles, including dogs with swollen feet and puppies whose legs are caught in cage wire. On October 26, 2016 an inspector with the Wisconsin Department of Agriculture, during a routine inspection, noted that the "legs of puppies were observed to have passed completely below the mesh flooring up to the puppy's chest. Puppies were observed to have noticeable difficulty standing or moving comfortably." It was noted that, partly as a result of improper flooring, "observed dogs within the facility were being treated for foot health problems." While the facility claimed to have corrected the problem in an email on November 15, 2016, animal rights activists observed similar foot health problems on April 17, 2017, including dogs with painfully swollen and infected feet forced to walk on wire. An employee noted the same conditions persisting in 2021-2022. Finally, a USDA inspector noted in December of 2023 that "Some of the weaned puppies and preweaning-aged puppies in eleven enclosures were observed to have feet or legs pass through the smooth-coated mesh floors when they walked." Defendant's unlawful actions

were taken in violation of Wis. Stats. 951.02, which states that “No person may treat any animal, whether belonging to the person or another, in a cruel manner.” They are further a violation of ATCP 16.22(1)(b)2 and (b)3, which require that any wire flooring “shall be of an adequate gauge to prevent sagging under the weight of the dog or dogs kept in the enclosure, and to prevent injury to the dogs' feet” and that “Floor openings, if any, shall be small enough to prevent the feet of the smallest dog kept in the enclosure from passing through or becoming entangled in the openings.”

Dated: March 17, 2024

Respectfully submitted,

Wayne Hsiung