animal wellness action

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HUMANE
ECONOMY

November 5, 2025

The Honorable Jay Bhattacharya, M.D., Ph.D. Director, National Institutes of Health 9000 Rockville Pike Bethesda, MD 20892

The Honorable Marty Makary, M.D., M.P.H. Commissioner, U.S. Food and Drug Administration 10903 New Hampshire Avenue Silver Spring, MD 20993

Re: Request to Suspend Federal Funding for the Procurement of Dogs from Ridglan Farms

Dear Dr. Bhattacharya and Dr. Makary,

On behalf of Animal Wellness Action, Animal Wellness Foundation, the Center for a Humane Economy, Dane4Dogs, People for the Ethical Treatment of Animals (PETA), Rise for Animals, The Beagle Freedom Project, and The Simple Heart, we ask that the National Institutes of Health (NIH) halt the use of federal funds for the procurement of dogs from Ridglan Farms in Dane County in Wisconsin. On October 28, 2025, Ridglan Farms agreed to give up its state license to breed and sell dogs as part of a settlement agreement with state officials to avoid criminal animal cruelty charges. That set of terms does not take effect until July 2026.

It is concerning that violations at Ridglan Farms were missed by federal authorities, including the USDA's Animal and Plant Health Inspection Service (APHIS): violations were only identified after local and state authorities launched an investigation into the practices at Ridglan facilities. Of note, APHIS is entrusted with protecting the health and value of U.S. agriculture and natural resources but also regulates laboratory animals in the United States through its enforcement of the Animal Welfare Act (AWA). The incident reinforces that federal oversight of animal colonies bred for laboratory research is perfunctory and not a serious-minded animal welfare control.

The NIH has a history of funding research projects relying on procurement of beagles from Ridglan Farms. Examples include the NIH funding to the University of Missouri to buy 40 dogs

from Ridglan Farms in 2023 for a Rocky Mountain Spotted Fever vaccine study,¹ and the UW–Madison's confirmation that it has purchased dogs from Ridglan and stated that those studies "have been supported by grants from federal agencies."²

This request is grounded on substantial evidence demonstrating that Ridglan Farms has engaged in criminal animal cruelty over a period of years (see Addendum). A Wisconsin circuit court judge, two state agencies, licensed veterinarians, and independent experts have all confirmed that Ridglan repeatedly performed invasive surgical procedures on conscious dogs without anesthesia or pain relief, in clear violation of state law, veterinary standards of practice, and basic humane treatment.

Conflict with NIH and FDA Policy to Move Away from Animal Testing

Continuing to fund procurement of dogs from Ridglan Farms is inconsistent with NIH and FDA's stated commitments to reduce reliance on animal testing, improve scientific validity, and transition to testing methods grounded on human biology. On April 10, 2025, FDA announced its plan to phase out animal testing for monoclonal antibodies and other drugs. The FDA Roadmap to Reducing Animal Testing in Preclinical Safety Studies envisions that within three to five years, animal testing will be the exception rather than the norm. In an April 17, 2025 interview, Dr. Makary stated: "God did not make these animals on planet earth for us to do cruel things to them and subjugate them."

On April 29, 2025, NIH announced the establishment of the Office for the Verification, Innovation, and Reduction of Animals in Research (OVIRA). NIH leadership stated that the agency must prioritize human-based, non-animal research methods. NIH also launched a national Organoid and Tissue Chip Center to support transitioning away from animal-dependent research.

Congress passed the FDA Modernization Act 2.0 in 2022, removing the decades-old statutory requirement that all new drugs be tested on animals before entering human trials. FDA formally recognizes non-animal methods such as microphysiological systems, organoids, and computational toxicology as scientifically valid alternatives. The FDA Modernization Act 3.0 is pending in Congress, and that bill would direct federal agencies to publish a final rule to implement the FDA Modernization Act 2.0.

Ridglan Farms' conduct directly conflicts with these modernization goals. Funding the procurement of dogs from a facility repeatedly found to engage in criminal cruelty undermines scientific integrity, public trust, and the transition toward human-relevant research methods.

¹ Wisconsin puppy mill beagles suffer for human drug research, Fox 6 News, March 30, 2025. https://www.fox6now.com/news/wisconsin-puppy-mill-beagles-suffer-human-research

² Channel 3000 Covers Our Ridglan Exposé; UW-Madison Responds, Rise for Animals, August 14, 2025, https://riseforanimals.org/news/channel3000-aug-14-2025/

³ How We Can Keep Humans Safe Without Torturing Beagles, Meygan Kelly with New FDA Commissioner, Dr. Marty Makary. https://www.youtube.com/watch?v=ySQ5dhuFwIM

Requested Federal Action

For these reasons, we respectfully request that NIH issue a directive prohibiting the use of federal funds to procure dogs from Ridglan Farms. In addition, we request that NIH notify all NIH-funded institutions that the use of dogs sourced from Ridglan Farms is ineligible for reimbursement or inclusion in newly approved research protocols. We also seek to know if the information provided on animal welfare violations at Ridglan Farms violated any policies regarding the ethical sourcing and procurement of animals used in research in NIH-funded projects.

The federal government acted in the Envigo case, but only after thousands of animals suffered and public trust in regulatory oversight was damaged. In the case of Ridglan Farms, the evidence of criminal cruelty is already documented, verified, and ongoing. To continue the use of federal funds to purchase dogs from this facility is not neutrality. It is complicity.

We would be pleased to provide court records, inspection reports, veterinary affidavits, and additional documentation at your request.

Respectfully submitted,

Wayne Pacelle President Animal Wellness Action

Rebekah Robinson President

Ed Butler Executive Director Rise for Animals

Dane4Dogs

Wayne Hsiung Executive Director The Simple Heart Tamara Drake Director of Research and Regulatory Policy Center for a Humane Economy

Kathy Guillermo Senior Vice President People for the Ethical Treatment of Animals

Shannon Keith Founder & President Beagle Freedom Project

cc: Dr. Michael Watson, Administrator, Animal and Plant Health Inspection Service, U.S. Department of Agriculture

Addendum - Documented Criminal Conduct at Ridglan Farms

On October 23, 2024, extensive testimony and documentation of animal cruelty at Ridglan Farms were presented during a public court hearing in Dane County, Wisconsin. Former employees testified that between 2017 and 2022, hundreds of dogs were subjected to painful surgical mutilations without anesthesia or analgesia. Witnesses described dogs crying out, thrashing, bleeding on operating surfaces, and then being returned to cages without treatment or relief.

Since that hearing, multiple government and legal authorities have confirmed these abuses. On January 9, 2025, Judge Rhonda Lanford of the Dane County Circuit Court issued a written decision concluding that there was overwhelming evidence of criminal animal cruelty at Ridglan Farms and that no reasonable prosecutor could decline to bring charges. **Despite this clear legal determination**, **Ridglan continued the unlawful procedures**.

On February 5, 2025, inspectors from the Wisconsin Department of Agriculture, Trade, and Consumer Protection (DATCP) visited the facility, interviewed employees, and confirmed that painful, non-anesthetized surgeries were ongoing. DATCP ordered Ridglan to stop. The company did not.

On March 11, 2025, the Wisconsin Veterinary Examining Board (VEB) reviewed the evidence and warned that Ridglan's veterinarian would lose his license unless the facility ceased performing unauthorized surgeries and kept lawful surgical records. Again, Ridglan continued.

On August 11 and September 30, 2025, DATCP and the VEB conducted additional inspections. They found that Ridglan continued to violate the law and identified 308 new cases of dogs who had been surgically mutilated without anesthesia. In late September 2025, the VEB unanimously voted to suspend the license of Dr. Richard Van Domelen, the lead veterinarian at Ridglan Farms.

On October 28, 2025, Ridglan secured a deal to avoid criminal animal cruelty charges by agreeing to give up their license to breed and sell dogs for research by July 1, 2026.

The situation at Ridglan Farms has disturbing parallels with the drama at the Envigo beagle breeding facility in Cumberland, Virginia. At Envigo, chronic violations and neglect continued for years until federal authorities intervened. In that case, the Department of Justice seized approximately 4,000 dogs and secured a \$35 million criminal and civil settlement, the largest financial penalty ever imposed for Animal Welfare Act violations. At Envigo, however, government action only occurred after years of suffering and public exposure. The difference with Ridglan Farms is that NIH and FDA have advance warning, supported by court findings and state investigations, that criminal animal abuse has been ongoing. Their recent settlement agreement with state officials solidifies this.