

**STATE OF WISCONSIN
DANE COUNTY**

CIRCUIT COURT

For Official Use:

RIDGLAN FARMS, INC.
10489 W. Blue Mounds Road
Blue Mounds, WI 53517,

Plaintiff,

v.

DANE4DOGS, LTD.
200 E. Verona Avenue, PMB 5001
Verona, WI 53593

Case No.

Case Code: 30106

REBEKAH ROBINSON
1 Lakeside Dr., Apt. 611
Oakland, CA 94612,

JAMIE HAGENOW
2182 Erb Road
Verona, WI 53593,

and

SCOTT ("SCOTTY") GILBERTSON
501 W. Verona Avenue, Apt. 423
Verona, WI 53593,

Defendants.

SUMMONS

THE STATE OF WISCONSIN, to the entity/individuals named above as Defendants:

You are hereby notified that the Plaintiff named above has filed a lawsuit or other legal action against you. The Complaint, which is attached, states the nature and basis of the legal action.

Within forty-five (45) days, exclusive of the day of service, after the summons has been served personally upon the Defendant(s) or served by substitution personally upon another authorized to accept service of the summons for the Defendant(s), you must respond with a written

answer, as that term is used in Chapter 802 of the Wisconsin Statutes, to the Complaint. The Court may reject or disregard an answer that does not follow the requirements of the statutes. The answer must be sent or delivered to the Court, whose address is 215 S. Hamilton St., Madison, Wisconsin 53703, and to Plaintiff's attorneys, whose address is Husch Blackwell LLP, 33 E. Main St., Suite 300, Madison, WI 53703. You may have an attorney help or represent you.

If you do not provide a proper answer within forty-five (45) days, the Court may grant judgment against you for the award of money or other legal action requested in the Complaint, and you may lose your right to object to anything that is or may be incorrect in the Complaint. A judgment may be enforced as provided by law. A judgment awarding money may become a lien against any real estate you own now or in the future and may also be enforced by garnishment or seizure of property.

Dated this 4th day of April, 2025.

HUSCH BLACKWELL LLP
Attorneys for Ridgland Farms, Inc.

By:



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COMPLAINT

Plaintiff, Ridglan Farms, Inc. ("Ridglan Farms"), by its attorneys Husch Blackwell LLP, and for its claims against the above-named defendants for tortious interference with contractual relationships and willful and malicious injury to business pursuant to Wis. Stat. § 134.01, states and alleges as follows:

INTRODUCTION

Ridglan Farms was established in 1966 as a research facility committed to supporting the advancement of science through the humane use of animals in scientific research studies. As a central part of its research activities, Ridglan Farms breeds and raises beagles which are used in research trials that it conducts on behalf of clients, or are sold to customers, such as research institutions, for the same purpose. As a research facility, Ridglan Farms is held to the highest standards by the scientific community who benefit from its work. Ridglan Farms is also subject to extensive federal and state statutes and administrative regulations that govern its operations.

Ridglan Farms is regulated and licensed by the United States Department of Agriculture (“USDA”). Ridglan Farms holds a USDA Class A license and is also 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 required to comply with numerous protocols and procedures administered under that law in caring for its animals. Ridglan Farms is also regulated and licensed by the Wisconsin Department of Agriculture Trade & Consumer Protection (“DATCP”) pursuant to Wis. Admin. Code Ch. 16. Ridglan Farms has lawfully operated pursuant to these various federal and state regulations for many years and without significant incident.

Over the course of the past decade, Ridglan Farms has been targeted by various groups and individuals, including the Defendants named in this action, who seek to end the use of animals for scientific research purposes. While the activities of these groups and individuals have at times involved lawful protest, in recent years these activities have become unlawful resulting in the violation of Ridglan Farms’ rights and interests, including the intentional interference with Ridglan Farms’ contractual relationships with its customers and intentional coordinated efforts to harm Ridglan Farms’ business. Defendants do not merely advocate for ending the use of animals in

research. They have engaged in actions the purpose of which is to destroy Ridgland Farms' business. This lawsuit seeks damages against these Defendants, and other yet-to-be identified co-conspirators, for their wrongful conduct that has harmed Ridgland Farms. This lawsuit also seeks injunctive relief barring them from their ongoing tortious and unlawful conduct and from engaging in such conduct in the future.

PARTIES

1. Plaintiff, Ridgland Farms is a Wisconsin corporation located in Blue Mounds, Wisconsin. Ridgland Farms is a USDA Class-R licensed animal research facility and USDA Class A-licensed dog breeder serving educational and research institutions. Ridgland Farms is also licensed by DATCP and all of its operations are conducted exclusively for research purposes.

2. Defendant, Dane4Dogs Ltd. ("Dane4Dogs"), is a Wisconsin corporation, whose principal activities are based in Dane County. Dane4Dogs' stated mission is to end the breeding, sale, and use of dogs and cats for scientific research.

3. Defendant, Rebekah Robinson, is upon information and belief a California resident, but was a Wisconsin resident during much of activity that is the subject of this action. Upon information and belief Ms. Robinson is a co-founder and current President of Dane4Dogs. Upon information and belief Ms. Robinson is also known as Rebekah Klemm.

4. Defendant, Jamie Hagenow, a Wisconsin resident, is upon information and belief, a co-founder of Dane4Dogs.

5. Defendant, Scott Gilbertson, a Wisconsin resident, was a former employee of Ridgland Farms. Mr. Gilbertson worked for Ridgland Farms for less than one month.

JURISDICTION AND VENUE

6. This Court has jurisdiction over the subject matter of this dispute pursuant to Article VII, § 8 of the Wisconsin Constitution, which provides for the subject matter jurisdiction over all civil matters within the State of Wisconsin.

7. Venue is proper in Dane County under Wis. Stat. § 801.50(2)(a)-(c), as it is the county in which the claim arose, where property which is the subject of the claim is situated, and where at least one defendant resides or does substantial business.

BACKGROUND AND FACTUAL ALLEGATIONS

8. Dane4Dogs, since it was first organized, has been on a mission to shut down Ridgland Farms.

9. Upon information and belief, in or around 2018, Defendant Robinson emailed Defendant Hagenow, asking her if she wanted to “shut down” what she erroneously characterized as a puppy mill, namely Ridgland Farms.

10. Wanting to do just that, Hagenow joined Robinson in co-founding Dane4Dogs in 2018.

11. Since that time, Dane4Dogs, and others collaborating with Dane4Dogs, including the other Defendants and other yet-to-be identified individuals, have pursued their agenda through a variety of forms of activism, ranging from social media, to protests, to more recently, participating in the judicial and administrative complaint processes.

12. According to Hagenow at a recent public event on March 23, 2025, Dane4Dogs, and others collaborating with Dane4Dogs, have pursued a number of campaigns through the courts and administrative agencies by filing complaints against Ridgland Farms: (1) a petition seeking criminal charges against Ridgland Farms; (2) an investigation by DATCP; (3) investigations

through the Wisconsin Veterinary Examining Board (“VEB”); and (4) a complaint against Ridgman Farms filed with the USDA.

The Special Prosecutor Campaign:

13. In April 2017, a man named Wayne Hsiung and other animal activists entered Ridgman Farms’ facility without consent, stealing three beagles and documenting their unlawful break-in through the misleading use of video and photographic means.

14. Hsiung publicly boasted about this unlawful activity from inside Ridgman Farms on social media and elsewhere as “open rescue.”

15. On August 1, 2021, Dane4Dogs publicly encouraged individuals on its Facebook page to apply and work for Ridgman Farms, in order to provide Dane4Dogs with an “inside perspective.”

16. Scott Gilbertson is one such individual who briefly worked at Ridgman Farms for the purpose of manufacturing false evidence against Ridgman Farms.

17. Gilbertson worked at Ridgman Farms between January and February 2022. After having worked for less than one month, Gilbertson quit his employment with Ridgman Farms.

18. In the meantime, the Dane County District Attorney’s Office had charged Hsiung and two others with felony burglary and theft charges.

19. As the March 2024 criminal trial date against Hsiung and others approached, Ridgman Farms expressed growing concerns to the District Attorney about the physical safety employees, as well as for the security of its business, after receiving death threats.

20. On March 7, 2024, the Dane County District Attorney’s Office moved to dismiss the felony burglary and theft charges, citing Ridgman Farms’ concerns, which formed the basis for their desire “to no longer have this case proceed to trial.”

21. On March 8, 2024, the Court dismissed the criminal case against Hsiung and the other animal activists.

22. After expressing “profound disappointment” that he no longer faced a criminal trial and if convicted, up to sixteen years in prison, Hsiung approached Dane4Dogs with the idea to ask the court to appoint a Special Prosecutor to prosecute Ridgland Farms for animal cruelty.

23. On March 20, 2024, after quickly agreeing to this proposal, Dane4Dogs, in conjunction with Hsiung and other activist organizations, filed a Petition in Dane County Circuit Court, seeking to appoint a Special Prosecutor to pursue criminal charges against Ridgland Farms.

24. The court in that case, citing Wis. Stat. § 968.02(3), allowed for an *ex parte* hearing to be held in open court in October 2024 (the “Oct. 2024 *ex parte* hearing”). The court expressly barred Ridgland Farms from participating in the hearing and disallowed it from offering any contrary evidence or argument.

25. During that Oct. 2024 *ex parte* hearing, Dane4Dogs, Hsiung, and the other Petitioners referenced the misleading video and photographs from the unlawful 2017 break-in into Ridgland Farms as “evidence” for their allegations.

26. Also during that hearing, Dane4Dogs coordinated with Defendant Gilbertson to testify on Petitioners’ behalf.

27. Defendant Hagenow has personally credited herself with securing Gilbertson to testify on behalf of Dane4Dogs.

28. At the Oct. 2024 *ex parte* hearing, Gilbertson provided false testimony, claiming to have witnessed procedures that he would not have participated in, given the short duration of his employment three years prior.

29. Having been barred from participating in the hearing, Ridglan Farms was unable to conduct cross-examination of Gilbertson or other witnesses, or otherwise offer evidence showing this testimony to be false.

30. Nevertheless, after considering information such as Gilbertson's false testimony and the video and photographs from the 2017 unlawful entry, in January 2025, the Court referred the matter to a special prosecutor for further investigation.

Dane4Dogs' VEB Complaint Campaign:

31. Dane4Dogs has since repurposed its materials from the Oct. 2024 *ex parte* hearing to apply pressure on Wisconsin administrative agencies to target Ridglan Farms.

32. According to its website, in "December 2024, Dane4Dogs, in collaboration with ... Hsiung" and other activist organizations, "submitted a complaint about the veterinarians employed by Ridglan Farms to the Wisconsin Veterinary Examining Board."

33. After receiving that Complaint, on February 5, 2025, investigators working for VEB and/or DATCP showed up unannounced at Ridglan Farms' facilities to conduct an on-site inspection.

34. At approximately 1:00 p.m. that same day, Dane4Dogs was publicly posting about this ongoing inspection, stating on their website that they were "getting word that DATCP is at Ridglan Farms, possibly with DEA agents and/or other law enforcement, investigating 'veterinary practices.'"

35. At approximately 6:00 p.m. that same day, Dane4Dogs shared the "official word" they received from DATCP about the inspection, which stated that "[a]ll findings from the [sic] today's inspection will be reviewed by the Veterinary Examining Board and they will determine next steps as appropriate."

36. The next day, on February 6, 2025, the VEB submitted three separate Complaints to three Ridglan Farms veterinarians, requiring them to submit written responses and provide documents to questions about Ridglan Farms’ practices and procedures.

37. The VEB acknowledged that its allegations in each of the three Complaints requiring a response were “copied from the complaint” authored by Dane4Dogs, which the VEB transmitted to Ridglan Farms as well.

38. The VEB and counsel for Ridglan Farms and its veterinarians agreed that the responses to the three Complaints would be due on March 6, 2025.

39. However, on March 5, 2025—one day prior to even receiving written responses and requested documents from Ridglan Farms’ veterinarians—counsel for the VEB served a “Petition Seeking Summary Suspension” on one of the three Ridglan Farms veterinarians, to be presented to the VEB board members just six days later at a March 11, 2025 hearing.

40. The accompanying Petition was based on a sworn Affidavit from a VEB Investigator, which acknowledged that the VEB received a complaint from Defendant Robinson on behalf of Dane4Dogs.

41. Not only did the Affidavit consider the complaint from Robinson, but it fully acknowledged that it had “quoted verbatim” from it.

42. The Affidavit also stated, “I believe the statements of Scott Gilbertson, former employee of Ridglan Farms, to be true[.]”

43. In other words, Dane4Dogs’ complaint and the false information provided by Gilbertson spurned an investigation by DATCP and VEB that informed the Petition for Summary Suspension, as well as the three Complaints against Ridglan Farms veterinarians.

44. At the hearing, Defendant Robinson was the first to be called on to testify in favor of stripping the Ridgland Farms veterinarian of his license.

45. However, at the conclusion of the March 11, 2025 VEB hearing, the board voted to deny the Petition for Summary Suspension of the Ridgland Farms veterinarian's license.

Dane4Dogs' DATCP Campaign:

46. Upon information and belief, Dane4Dogs has also submitted one or more similar complaints to DATCP in an effort to weaponize the powers of that government agency against Ridgland Farms.

47. Following such complaints and/or other communications, Ridgland Farms was summoned by DATCP to attend a meeting with DATCP representatives to discuss alleged violations of the DATCP administrative code.

48. During that conference, DATCP representatives identified what appeared to be extremely vague and nonspecific alleged violations of ATCP Ch. 16 associated with Ridgland Farms' operations. In response, Ridgland Farms requested information and clarification from DATCP about the applicable regulatory standards DATCP contended had been violated. Ridgland Farms also asked DATCP what if any changes were needed in order to address these extremely vague and nonspecific alleged violations and ensure its future compliance.

49. However, DATCP refused to provide any such information or clarification stating that it did not provide "legal advice" to licensed entities.

50. DATCP also told Ridgland Farms that it had no guidance documents or other similar information relevant to the alleged violations. However, several weeks later, DATCP did provide Ridgland Farms with written guidance documents, but acknowledged that such documents had been recently prepared after-the-fact. Yet, those guidance documents do not address with any greater

specificity the extremely vague and nonspecific alleged violations that DATCP had previously raised.

Dane4Dogs' USDA Campaign:

51. Upon information and belief, Dane4Dogs has also submitted a complaint to USDA that raises the very same issues that it raised with its VEB complaint, and likely in complaints it has made to DATCP.

52. In response to Dane4Dogs' USDA complaint, investigators from USDA conducted an unannounced inspection of Ridglan Farms' facility on January 22, 2025.

53. Following that inspection, USDA issued a report that rigorously addressed each of the allegations made by Dane4Dogs. In that report, USDA squarely rejected Dane4Dogs' allegations and found that Ridglan Farms' operations were in compliance with applicable provisions of the federal Animal Welfare Act administered by USDA.

Dane4Dogs targets Ridglan Farms' customers to "take down an industry"

54. Defendants have more recently used these four campaigns discussed above to destroy Ridglan Farms' contractual business relationships.

55. Dane4Dogs has improperly obtained a list of some of Ridglan Farms' customers. As with many business's customer and contract information, Ridglan Farms' customer list is confidential and proprietary and Ridglan Farms takes steps to protect that information from public disclosure.

56. Ridglan Farms' customer list is also valuable to Dane4Dogs' broader mission, which Hagenow recently, publicly acknowledged to be not about "rescuing puppies," but instead, "taking down an industry."

57. In a letter dated January 27, 2025, Dane4Dogs wrote to many of Ridgland Farms' customers, stating that Ridgland Farms is "under criminal investigation for animal cruelty" and cited the DATCP investigation.

58. The letter then included a direct threat to those customers of Ridgland Farms: either terminate your relationship with Ridgland Farms, or be named on a published list of Ridgland Farms customers. The letter stated, in part:

We know this news is very concerning to your organization as a client of Ridgland Farms, and trust that a business relationship with a breeder that treats their dogs so poorly must be appalling to you.

We strongly encourage you to take Ridgland Farms off your list of vendors.

We will be publishing a list of Ridgland Farms buyers on March 1.

If you would like to be removed from this list, **you can email info@dane4dogs.com with an official statement of ending your relationship with Ridgland Farms.**

59. Ridgland Farms was subsequently contacted by customers, raising concerns about the publicity associated with being on a published list.

60. Ridgland Farms was contacted by one longstanding customer, who informed Ridgland Farms that it had decided to terminate its ongoing business relationship with Ridgland Farms because of the letter.

61. Dane4Dogs has also publicly disclosed on its website that other customers of Ridgland Farms have succumbed to Dane4Dogs' threats by ceasing to do business with Ridgland Farms.

62. The loss of business from these customers, and potentially others, reflects a loss of substantial revenue to Ridgland Farms.

63. Dane4Dogs' actions amount to extortion: stop doing business with Ridgland Farms or we will publicly shame you. Accordingly, such actions have no legal justification.

64. Given the lack of justification for Dane4Dogs' actions, Ridgland Farms sent a cease and desist letter to Dane4Dogs, via the email address listed on their extortion letter to Ridgland Farms' customers.

65. Despite Ridgland Farms' cease and desist letter, Hagenow recently stated at a Dane4Dogs event that the list would be "posted soon" and that Dane4Dogs would be leading protests at the premises of Ridgland Farms' customers.

66. In fact, another Dane4Dogs representative stated that they are already organizing these protests, publicly naming two such customers on that list.

COUNT I – CIVIL ACTION FOR INJURY TO BUSINESS

67. Plaintiff incorporates paragraph 1 through 66 above.

68. Defendants, along with other yet-to-be identified individuals, have acted together with the common purpose of injuring Ridgland Farms' business in violation of Wis. Stat. § 134.01.

69. The actions of Defendants, along with other yet-to-be identified individuals, that were taken to carry out this common purpose, including the letter to Ridgland Farms' customers making extortionate threats, were willful and malicious and intended to harm Ridgland Farms' business.

70. The willful and malicious actions of Defendants, along with other yet-to-be identified individuals, have financially injured Ridgland Farms. As result of those actions, Ridgland Farms has sustained substantial damages.

COUNT II – TORTIOUS INTERFERENCE WITH EXISTING AND PROSPETIVE CONTRACTUAL RELATIONSHIPS

71. Plaintiff incorporates paragraph 1 through 70 above.

72. Defendants, along with other yet-to-be identified individuals, have acted together with the common purpose of intentionally interfering with Ridglan Farms' existing and prospective contractual relationships.

73. As part of Defendants' actions, Dane4Dogs sent a letter to Ridglan Farms' customers, demanding that those customers refrain from further business dealings with Ridglan Farms and explicitly threatening those customers with adverse actions against them if they continued to do business with Ridglan Farms.

74. These actions were intentional, designed to fulfill Dane4Dogs' stated mission of destroying Ridglan Farms' business, and thus such actions cannot be deemed legally justified.

75. As a result of Defendants' improper actions, Ridglan Farms has lost customers with both existing and prospective contractual relationships, and has sustained substantial damages.

REQUEST FOR RELIEF

WHEREFORE, Plaintiff Ridglan Farms requests the following relief:

- A. For judgment against the Defendants, and each of them, consistent with the allegations of this Complaint for both compensatory and punitive damages;
- B. For orders of the Court imposing injunctive relief on Defendants;
- C. For its costs, disbursements and allowable attorneys' fees;
- D. For such other and further relief as the Court deems appropriate.

Dated this 4th day of April, 2025.

HUSCH BLACKWELL LLP
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By:



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