

STATEMENT OF COMPLAINT



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
 Harrisburg

In order for the Department of State to initiate an investigation of possible violations of the licensing, registration, certification or notary commission laws and regulations of the Commonwealth by a licensee, registrant, certificate holder or notary commission holder of the Department, the complainant must complete and sign this form. Failure to supply complete and accurate information may result in delayed processing of your complaint. Please be aware that pursuant to Act 25 of 2009, 63 P.S. §2205.1, if you submit a complaint anonymously, the Department will not be able to share any information pertaining to the complaint with anyone, including you. Please return this completed form to: **DEPARTMENT OF STATE, PROFESSIONAL COMPLIANCE OFFICE, 2601 NORTH THIRD STREET, P.O. BOX 69522, HARRISBURG, PA 17106-9522.**

TYPE OF COMPLAINT: PROFESSIONAL/OCCUPATIONAL LICENSE/CERTIFICATE/REGISTRATION NOTARY OTHER

A. COMPLAINANT INFORMATION

LAST NAME Keeler	FIRST Jennifer	MIDDLE INITIAL A
STREET ADDRESS (Number and Name) PVMA, 8574 Paxton Street		
CITY Hummelstown	COUNTY Dauphin	STATE PA
TEL. (Include Area Code) (HOME)		ZIP CODE 17036
(WORK) 717-220-1437		

B. COMPLAINANT'S ATTORNEY, IF ANY

LAST NAME	FIRST	MIDDLE INITIAL
STREET ADDRESS (Number and Name)		
CITY	COUNTY	STATE
TEL. (Include Area Code)		ZIP CODE
FIRM NAME		

C. NAME AND ADDRESS OF WITNESS, IF ANY

LAST NAME	FIRST	MIDDLE INITIAL
STREET ADDRESS (Number and Name)		
CITY	COUNTY	STATE
TEL. (Include Area Code)		ZIP CODE
If needed, is this witness willing to support your complaint by appearing at a hearing? <input type="checkbox"/> YES <input type="checkbox"/> NO		

D. NAME AND ADDRESS OF SECOND WITNESS, IF ANY

LAST NAME	FIRST	MIDDLE INITIAL
STREET ADDRESS (Number and Name)		
CITY	COUNTY	STATE
TEL. (Include Area Code)		ZIP CODE
If needed, is this witness willing to support your complaint by appearing at a hearing? <input type="checkbox"/> YES <input type="checkbox"/> NO		

NOTE: If additional witnesses are available, list names, addresses, and other pertinent data in a manner similar to above on 8½ x 11" paper.

E. ARE YOU WILLING TO APPEAR AT A HEARING IN HARRISBURG IF NECESSARY? YES NO

DEFENDANT INFORMATION

F. BUSINESS ESTABLISHMENT INVOLVED, IF ANY

LAST NAME NoBull LLC	FIRST	MIDDLE INITIAL
STREET ADDRESS (Number and Name) 3 Sprout Road		
CITY Christiana	COUNTY Lancaster	STATE PA
TEL. (Include Area Code) 484-6783739		ZIP CODE 17509
PROPRIETOR Rusty Herr, Operating Partner Ethan Wentworth, Operating Partner		

G. INDIVIDUAL INVOLVED, IF ANY

LAST NAME Wentworth	FIRST Ethan	MIDDLE INITIAL
STREET ADDRESS (Number and Name) 105 Church Road		
CITY Airville	COUNTY York	STATE PA
TEL. (Include Area Code)		ZIP CODE 17302
LICENSE/REGISTRATION/ CERTIFICATE/COMMISSION TYPE AND NUMBER IF KNOWN NA		

H. THIS SECTION IS FOR NOTARY COMPLAINTS ONLY:

Expiration date of notary's commission if known *(this date should appear on the notary's stamp, printed beneath the notary seal)*:

Date of transaction for which this complaint is being filed:

I. DESCRIPTION OF COMPLAINT

Please describe your complaint in detail below. State the facts briefly and clearly. List services provided by the licensee, registrant, certificate holder or commission holder. Provide relevant dates. List fees paid for notary services, if applicable. Attach **copies** of related documents that support your complaint. Do **NOT** enclose original documents, as they cannot be returned to you. If you need more space to describe your complaint, please continue on additional 8½ x 11" sheet(s) of paper.

**Complaints should be typewritten or clearly printed in black or blue ink.
Please keep a copy of your Statement of Complaint form for your records.**

The Pennsylvania Veterinary Medicine Association has received multiple complaints from veterinarians about the illegal practice of veterinary medicine by unlicensed individuals employed by NoBull Solutions LLC. The company's Facebook page advertises "all encompassing reproductive management " for dairy farmers. Reports from our members, as well as documentary evidence on their own Facebook page show non-veterinarians using ultrasounds and making diagnoses.

The operating partners of NoBull Solutions LLC are Rusty Herr and Evan Wentworth. Both of these individuals were fined by the Commonwealth for the illegal practice of veterinary medicine in the past. Ethan Wentworth was fined \$3,000 and ordered to Cease and Desist in 2018 (Docket No. 1928-57-17; File No. 16-57-05621). Rusty Herr was fined \$3,500 and ordered to Cease and Desist in 2010 (Docket No. 2296-57-09; File No. 09-57-05797). In spite of this both individuals continue to practice veterinary medicine without a license and have hired others to do the same.

Attached to this complaint are screen shots of the Facebook pages of NoBull Solutions LLC, Rusty Herr and Ethan Wentworth. While the Facebook page for NoBull does not list any employees, Mr. Herr and Mr. Wentworth identify themselves as operating partners on their personal Facebook pages. The screenshots of the company page include photographs of Mr. Herr performing an ultrasound on a horse and a shared post from Dylan Brantner, an employee of NoBull Solutions LLC, stating that he performed an ultrasound.

J. RESOLUTION

How would you like this complaint to be resolved?

Since these individuals continue to practice veterinary medicine without a license after their initial Order to Cease and Desist, we request that the state file contempt charges with Commonwealth Court.

PVMA is able to supply additional witnesses upon request

K. COMPLAINANT'S VERIFICATION

I verify that the facts and statements set forth in this complaint are true and correct to the best of my knowledge, information and belief. I understand that statements in this complaint are made subject to the criminal penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

x Jennifer A. Healy
(FIRST COMPLAINANT'S SIGNATURE)

x _____
(SECOND COMPLAINANT'S SIGNATURE, IF ANY)

DATE: 2/20/2020

DATE: _____

x _____
(SIGNATURE OF PERSON COMPLETING THIS FORM, IF OTHER THAN COMPLAINANT)

DATE: _____

SUBMIT COMPLETED FORM BY MAIL TO: **Professional Compliance Office
Department of State
2601 North Third Street, P.O. Box 69522
Harrisburg, PA 17106-9522**
OR BY: **Fax 717-705-2882**

L. RECORDS RELEASE (PLEASE COMPLETE IF IT APPLIES TO YOUR COMPLAINT).

TO WHOM IT MAY CONCERN:	
THIS WILL AUTHORIZE _____ (Name of physician, practitioner, hospital or clinic)	
to release to the Department of State and its authorized representatives any pertinent medical records and copies of x-rays relating to _____ (Patient's name)	
for the purpose of investigating a complaint.	
Signature _____	Witness _____
Date: _____	Date: _____

THANK YOU FOR BRINGING YOUR CONCERNS TO OUR ATTENTION.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BEFORE THE STATE BOARD OF VETERINARY MEDICINE

Commonwealth of Pennsylvania :
Bureau of Professional and :
Occupational Affairs : Docket No. 2296-57-09
v. : File No. 09-57-05797
Rusty Herr, :
Respondent :

ORDER

AND NOW, this 13th day of May 2010, the State Board of Veterinary Medicine, having duly convened and considered the entire record of the proceedings, and based upon the foregoing findings of fact, conclusions of law and discussion, hereby finds that Rusty Herr, is subject to the imposition of a CIVIL PENALTY in the amount of \$3,500. The civil penalty shall be paid by certified check or money order made payable to the Commonwealth of Pennsylvania, State Board of Veterinary Medicine, and mailed to Board Counsel, State Board of Veterinary Medicine, 2601 N. Third Street, P.O. Box 2649, Harrisburg, PA 17105-2649. Failure to remit the civil penalty may result in additional legal action against Respondent.

Respondent Rusty Herr is hereby **ORDERED** to **CEASE** and **DESIST** from the unlicensed practice of veterinary medicine. Failure to cease and desist from veterinary medical practice may result in additional legal action.

This **ORDER** shall become effective on June 2, 2010, thirty days from the date of mailing.

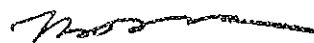
BY ORDER:

BUREAU OF PROFESSIONAL
& OCCUPATIONAL AFFAIRS

STATE BOARD OF VETERINARY
MEDICINE



BASIL J. MERENDA,
COMMISSIONER



ROBIN J. BERNSTEIN, ESQUIRE
CHAIRPERSON

Respondent:

Rusty Herr
200 Hawkins Road
Oxford, PA 19363

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BEFORE THE STATE BOARD OF VETERINARY MEDICINE

Commonwealth of Pennsylvania	:	
Bureau of Professional and	:	
Occupational Affairs	:	Docket No. 1928-57-17
	:	File No. 16-57-05621
v.	:	
	:	
Gideon Alphonse Stoltzfus,	:	
Respondent	:	
	:	
Commonwealth of Pennsylvania	:	
Bureau of Professional and	:	
Occupational Affairs	:	Docket No. 1929-57-17
	:	File No. 16-57-05622
v.	:	
	:	
Ethan Wentworth,	:	
Respondent	:	

PROPOSED ORDER

AND NOW, this 12th day of September 2018, in accordance with the foregoing findings of fact, conclusions of law and discussion,

It is hereby ORDERED that Respondents Gideon Alphonse Stoltzfus and Ethan Wentworth shall each IMMEDIATELY CEASE AND DESIST from the unlicensed practice of veterinary medicine.

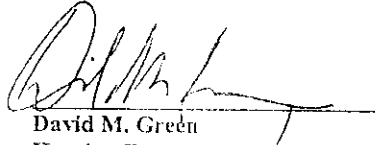
It is FURTHER ORDERED that a CIVIL PENALTY in the amount of THREE THOUSAND DOLLARS (\$3,000.00), EACH shall be assessed against Respondents Gideon Alphonse Stoltzfus and Ethan Wentworth, for their unlicensed practice of veterinary medicine.

The civil penalty and costs of investigation shall be paid by certified check or money order made payable to the Commonwealth of Pennsylvania, State Board of Veterinary Medicine, and mailed to Board Counsel, State Board of Veterinary Medicine, 2601 N. Third Street, P.O. Box

69523, Harrisburg, PA 17106-9523. Failure by any Respondent to remit the civil penalty may result in additional legal action against that Respondent.

The State Board of Veterinary Medicine has announced its intention to review this Proposed Report in accordance with 1 Pa. Code § 35.226(a)(2).

BY ORDER:



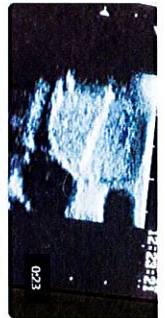
David M. Green
Hearing Examiner

For the Commonwealth: Timothy P. Smith, Esquire
Commonwealth of Pennsylvania
GOVERNOR'S OFFICE OF GENERAL COUNSEL
Department of State
P.O. Box 69521
Harrisburg, PA 17106-9521

For Respondents: Gideon Alpheus Stoltzfus, aka Alphonse Stoltzfus
281 White Horse Rd.
Gap, PA 17527

Ethan Wentworth
105 Church Rd.
Airville, PA 17302

Date of Mailing: 9/12/18



TWINS!!! Not what we like to find in c...

356 Views · 9 weeks ago

Page Transparency See All

Facebook is showing information to help you better understand the purpose of a Page. See actions taken by the people who manage and post content.

Related Pages

- March Madness 2020 Agriculture** Like
- Purple Vision Board... Dairy Farm** Like
- Stewart Friesen Athlete** Like

Create a Page

Privacy · Terms · Advertising · Ad Choices · Cookies · More · Facebook © 2020



16

Like Comment Share

Write a comment... **Mary McCaffrey Heinz** ...

Most Relevant

6 Comments 1 Share

Nobull Solutions, LLC



TWINS!!! Not what we like to find in c...
356 Views · 9 weeks ago

Page Transparency See All
Facebook is showing information to help you better understand the purpose of a Page. See actions taken by the people who manage and post content.

Related Pages

- March Madness 2020** Agriculture **Like**
 - Purple Vision Board...** Dairy Farm **Like**
 - Stewart Friesen** Athlete **Like**
- [Create a Page](#)

Privacy · Terms · Advertising · Ad Choices · Cookies · More · Facebook © 2020

Write a comment...

Send Email

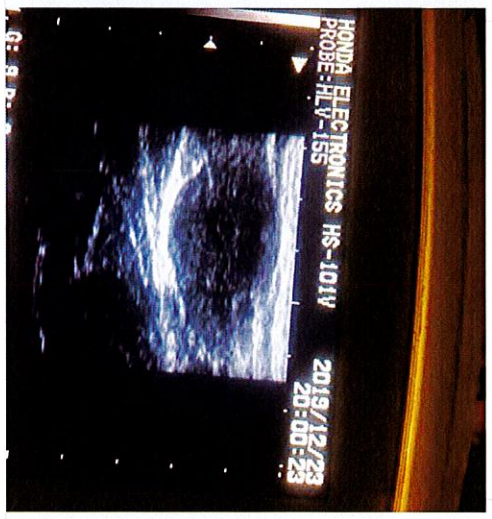
Like

Nobull Solutions, LLC
January 15

Nice work and Happy birthday DB!!! 🎉🎉🎉

Dylan Brantner
January 15

Just wanted to say thank you to all the people that took time out of there day to wish me happy birthday! I spent my day breeding and ultra sounding cows! The P... [See More](#)





Ethan Wentworth

- Timeline
- About
- Friends
- Photos
- Videos
- More
- Add Friend

Do you know Ethan?

To see what he shares with friends, send him a friend request.

Add Friend



Ethan Wentworth
October 1, 2019

- Operating partner at Nobull Solutions, LLC
- Studied at University of Wisconsin-Madison Farm and Industry Short Course
- Went to Solanco High School
- Married to Gabrielle Murphy Wentworth

Photos



See All





Rusty Herr

Love God. Love people. Give unconditionally. Be kind... always be kind ❤️

- Timeline
- About
- Friends
- Photos
- Videos
- More
- Add Friend

Do you know Rusty?

To see what he shares with friends, send him a friend request.

Add Friend

Intro

- Self-Employed
- Owner at Golden-Rose Genetics
- Operating partner at Nobull Solutions, LLC
- Lives in Christiansa, Pennsylvania
- Married to Heather Herr
- Joined February 2012

 Rusty Herr
21 hrs · 🌐

This would be an awesome place to work and people to work for if you have what it takes!

 Oakridge Dairy LLC posted a job.
21 hrs · 🌐

Job Overview:
The role of Dairy Human Development is to ensure a high performing workplace and workforce that fosters a healthy, safe, and productive work env... See More

ELLINGTON · FULL-TIME

[Apply Now](#)

