

**COMMONWEALTH OF MASSACHUSETTS  
TOWN OF LINCOLN  
ZONING BOARD OF APPEALS**

ROBERT DOMNITZ and others	)
Appellants,	)
	)
v.	)
	)
ALLY VETERINARY SPECIALTY	)
CENTER, LLC,	)
Appellee.	)
	)

**DECLARATION OF DR. MICHELLE CUSTEAD, DVM, DACVIM IN SUPPORT OF  
ALLY VETERINARY SPECIALTY CENTER, LLC'S RESPONSE TO  
AND MOTION TO DISMISS APPEAL**

COMMONWEALTH OF MASSACHUSETTS	)	
	)	ss.
MIDDLESEX COUNTY	)	

I, MICHELLE CUSTEAD, DVM, DACVIM, declare under penalty of perjury as follows:

1. I am the owner and business operator of Ally Veterinary Specialty Center, LLC of 16 Mill Street, Lincoln ("Ally").
2. I am over the age of 18 years. I make this declaration based on my personal knowledge and, if asked to testify, could testify to its contents.
3. I have developed, launched, expanded, and operated specialty veterinary oncology practices in multiple settings while simultaneously training interns, veterinary students, junior staff, and clinical teams. Before founding Ally, I developed and expanded an oncology service line at MVS in Monona, Wisconsin from 2020 through 2024, where I instructed interns, mentored veterinary student externs, supervised secondary-level clinical learners, and developed structured clinical teaching content, including case-

presentation review and journal-club style instruction. From 2015 through 2020, I also helped expand the oncology service at WVRC in Waukesha, Wisconsin, significantly increasing the scope of a service and operational capacity of a service that had previously relied on only part-time oncology support. In addition, I taught oncology topics to fourth-year veterinary students and veterinary interns at Purdue University from 2012 through 2015. This experience included supervised clinical instruction, case-based teaching, and mentorship within a specialty medical environment.

4. Ally has developed a partnership with the Minuteman Regional Vocational Technical School ("Minuteman"). The Ally-Minuteman partnership integrates advanced veterinary specialty care with structured educational programming designed to support Minuteman's mission of workforce development, hands-on learning, and career readiness, including competency-based clinical training, workforce development pathways, and supervised experiential learning. Ally's facility is a fully integrated specialty veterinary clinic that simultaneously functions as a structured educational environment. Ally, in partnership with Minuteman, is further designing a clinical operation in which education is intentionally embedded into daily workflow to allow students to gain meaningful exposure to real-world veterinary medicine within a professionally operated and carefully supervised setting. Clinical operations, scheduling, facility planning, and student engagement protocols are coordinated in partnership with Minuteman administration and instructional staff. The structure of the project creates a uniquely strong educational environment by allowing students to follow clinical cases across multiple stages of care rather than isolated appointments alone. Students engage with clinical workflows, diagnostic reasoning, and interdisciplinary collaboration in a manner that aligns with

competency-based veterinary education. Ally's operational model is intentionally designed to integrate structured clinical education, workforce preparation, supervised mentorship, and competency-based learning into the daily operation of the facility.

5. Ally signed a lease with Minuteman for 16 Mill Street, Lincoln, Massachusetts, which is on Minuteman's campus. A copy of the lease is attached as Exhibit A hereto. Ally currently is in the process of doing repairs to the premises.
6. Minuteman students have already begun partnering with Ally, with the intent that the full experiential learning program at Ally will be implemented in the Fall of 2026.
7. Ally is informed that in the 2025-2026 school year, there were 44 Minuteman students enrolled in Minuteman's veterinary science program.
8. Minuteman has described the educational partnership with Ally as of great "importance" and "foundational" to the "success and integrity" of its Veterinary Science Program. The subject Minuteman students will be "immersed" in veterinary clinical exposure daily to facilitate those seeking to attain the Certified Veterinary Assistant ("CVA") credential, who are each required to have a minimum of 225 supervised clinical hours. A copy of the April 6, 2026 letter from Minuteman to Mr. Metevier is attached hereto as Exhibit B.
9. Parking on the premises is sufficient to meet the project's needs. There will be 10 parking spots on the premises. Students will walk to Ally from the Minuteman school next door; students will not be permitted to park at the premises. Only 1-3 parking spots

will be needed for Ally clients at a time. There are 7 staff members at Ally, each with a car. Consequently, Ally does not expect that its parking lot will be full. However, in the event of a shortage of parking, staff would be permitted to park in the school's parking lot and walk to the premises.

10. On March 18, 2026, N. Jon Metivier, Lincoln's Building Commissioner and Zoning Enforcement Officer, issued a determination to Ally that, Ally's "affiliation with the school and the associated educational component are permitted in any zoning district under Massachusetts General Laws Chapter 40A, Section 3 (the Dover Amendment). Accordingly, the proposed use is allowable provided that the educational component is maintained." A copy of the March 18, 2026 letter is attached hereto as Exhibit C.

Under the penalties of perjury under the laws of the Commonwealth of Massachusetts, I declare that I have read the foregoing and that the facts stated in it are true to the best of my knowledge.

Dated: May 28, 2026

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Michelle Custead, DVM, DACVIM

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Dated: May 28, 2026

  
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Michelle Custead, DVM, DACVIM

