

***IN THE MATTER OF THE PETITION FOR TERMINATION OF PROBATION BY:***

***SUZANNE KAY HANSON***

**Veterinary Medical Board Case Number 4602018000478**

**Office of Administrative Hearings Case Number 2022050644**

**PETITION FOR EARLY TERMINATION PACKET**

- Exhibit 1 Notice of Hearing
- Exhibit 2 License Certification for Suzanne Kay Hanson, Veterinarian License Number 9593
- Exhibit 3 Decision and Order in *In the Matter of the Accusation Against: Suzanne Kay Hanson*, Veterinary Medical Board Case Number 4602018000478
- Exhibit 4 Petitioner's Petition for Early Termination, dated April 1, 2022, and the documents in support thereof including:
- a. Letter by Petitioner's Counsel, Amit Singh, dated April 1, 2022 (pp. 1-15);
  - b. Petitioner's Petition for Early Termination (pp. 16-20);
  - c. Petitioner's Narrative Statement and enclosures thereto (pp. 21-27);
  - d. Letter by Francine Farrell, MS, LMFT, ICADC re: Petitioner's participation in support group (pp. 28-31);
  - e. Six Letters In Support of Petitioner's Petition (pp. 32-44);
  - f. Petitioner's Relapse Prevention Plan (pp. 45-46);
  - g. Letter by Lia Willendrup, BA, CATC re: Petitioner's residential treatment (pp. 47-48);
  - h. Continuing Education Appendix and related Certificates of Completion (pp. 49-68); and,
  - i. Order for Dismissal in *People v. Suzanne Hanson*, Sutter County Superior Court Case Number CRTR 17-3419 (pp. 69-73).
- Exhibit 5 Probation Compliance Report by Probation Monitor Kathy Budd, dated April 6, 2022

# **Exhibit 1**



**VIA ELECTRONIC MAIL, CERTIFIED MAIL AND REGULAR MAIL**

May 2, 2022

Suzanne Kay Hanson  
22 River Wood Loop  
Chico, CA 95926-3090  
[REDACTED]

Rothschild, Wishek & Sands LLP  
Attn: Amit Singh  
765 University Ave  
Sacramento, CA 95825  
[asingh@rwsllaw.com](mailto:asingh@rwsllaw.com)

**RE: HEARING NOTICE  
OAH Case No. TBD  
Petition for Reinstatement or Modification of Penalty – Suzanne Hanson**

Dear Dr. Hanson:

You are hereby notified that a hearing will be held before the Veterinary Medical Board, Department of Consumer Affairs:

**Date: Thursday, July 21, 2022  
Time: 1:00 PM Pacific Time  
Location: Department of Consumer Affairs  
Hearing Room  
1625 N. Market Blvd  
Sacramento, CA 95834**

**Alternatively, in lieu of attending in-person at this hearing in the Sacramento office, you may attend and participate virtually via Webex:**

**Event address:**  
<https://dca-meetings.webex.com/dca-meetings/j.php?MTID=md34ebbe03e5df379e71f064198124cb0>

**Event number: 2494 406 5131  
Event password: VMB07212022**

**Phone audio conference: (415) 655-0001  
Access code: 249 440 65131  
Passcode: 86207212**

The hearing will be conducted before the Veterinary Medical Board, Department of Consumer Affairs and an administrative law judge of the Office of Administrative Hearings, who will preside over the Petition for Reinstatement or Modification of Penalty.

You may be present at the hearing. You have the right to be represented by an attorney at your own expense. You are not entitled to the appointment of an attorney to represent you at public expense. You are entitled to represent yourself without legal counsel. You may present any relevant evidence and will be given full opportunity to cross-examine all witnesses testifying against you. You are entitled to the issuance of subpoenas to compel the attendance of witnesses and the production of books, documents, or other things by applying to:

**Office of Administrative Hearings  
Attn: General Jurisdiction  
2349 Gateway Oaks, Suite 200  
Sacramento CA 95833**

**INTREPRETER:** Pursuant to section 11435.20 of the Government Code, the hearing shall be conducted in English language. If a party or party's witness does not proficiently speak or understand the English language and before commencement of the hearing requests language assistance, an agency subject to the language assistance requirement in section 11435.15 of the Government Code shall provide a certified interpreter or an interpreter approved by the administrative law judge conducting the proceedings. The cost of providing the interpreter shall be paid by the agency having jurisdiction over the matter if the administrative law judge or hearing officer so directs, otherwise by the party for whom the interpreter is provided. If you or a witness requires the assistance of an interpreter, ample advance notice of this fact should be given to the Office of Administrative Hearings so that appropriate arrangements can be made.

**CONTINUANCES:** Under section 11524 of the Government Code, the agency may grant a continuance, but when an administrative law judge of the Office of Administrative Hearings has been assigned to the hearing, no continuance may be granted except by him or her or by the presiding judge for good cause. When seeking a continuance, a party shall apply for the continuance within 10 working days following the time the party discovered or reasonably should have discovered the event or occurrence which establishes good cause for the continuance. A continuance may be granted for good cause after the 10 working days have lapsed only if the party seeking the continuance is not responsible for and has made a good faith effort to prevent the condition or even establishing the good cause.

Please visit the Board's website at [www.vmb.ca.gov](http://www.vmb.ca.gov) to view a copy of the agenda or you may contact me at (916) 282-6911 or via email at [jeffrey.weiler@dca.ca.gov](mailto:jeffrey.weiler@dca.ca.gov)

Sincerely,



Jeffrey Weiler  
Probation Monitor

cc: Daniel McGee, Deputy Attorney General



# **Exhibit 2**



## CERTIFICATION OF LICENSE HISTORY

This is to certify that I, Matthew McKinney, Enforcement Manager of the Veterinary Medical Board (Board), Department of Consumer Affairs, State of California, share the responsibility of maintaining control and custody of the official records of the Board. I made or caused to be made a diligent search of the files and records concerning the license history of Suzanne Kay Hanson. I have determined that the official records prepared by Board employees, acting within the scope of their duties, show the dates and time periods listed herein for the issuance, expiration, periods of invalidity, and renewals of the license, as well as citations issued and periods of formal Board discipline:

**VET No. 9593:**

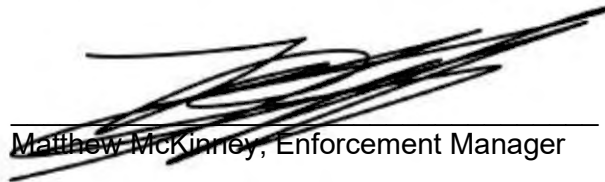
Suzanne Kay Hanson  
22 River Wood Loop  
Chico, CA 95626

First Issued: June 19, 1987  
Expiration: November 30, 2023  
Status: Current  
Secondary Status: Probation

**Discipline:**

On September 25, 2019, a Decision and Order became effective adopting the Stipulated Settlement and Disciplinary Order in the Matter of the Accusation, case No. 46020180000478, filed on April 5, 2019. The Order placed Dr. Suzanne Hanson on probation for five years with terms and conditions.

Given under my hand at Sacramento, California, this 7<sup>th</sup> day of April 2022.



Matthew McKinney, Enforcement Manager

# **Exhibit 3**

**BEFORE THE  
VETERINARY MEDICAL BOARD  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. 4602018000478

**SUZANNE KAY HANSON  
22 River Wood Loop  
Chico, CA 95926-3075**

**Veterinarian License No. 9593**

Respondent.

**DECISION AND ORDER**

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Veterinary Medical Board, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on September 25, 2019.

It is so ORDERED August 26, 2019.

  
\_\_\_\_\_  
FOR THE VETERINARY MEDICAL BOARD  
DEPARTMENT OF CONSUMER AFFAIRS

1 XAVIER BECERRA  
Attorney General of California  
2 JANICE K. LACHMAN  
Supervising Deputy Attorney General  
3 KAREN R. DENVIR  
Deputy Attorney General  
4 State Bar No. 197268  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 210-7886  
Facsimile: (916) 327-8643  
7 *Attorneys for Complainant*

8  
9 **BEFORE THE**  
**VETERINARY MEDICAL BOARD**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12  
13 In the Matter of the Accusation Against:

Case No. 4602018000478

14 **SUZANNE KAY HANSON**  
22 River Wood Loop  
15 Chico, CA 95926-3075

**STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER**

16 **Veterinarian License No. 9593**

17 Respondent.

18  
19 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
20 entitled proceedings that the following matters are true:

21 PARTIES

22 1. Jessica Siefertman (Complainant) is the Executive Officer of the Veterinary Medical  
23 Board (Board). She brought this action solely in her official capacity and is represented in this  
24 matter by Xavier Becerra, Attorney General of the State of California, by Karen R. Denvir,  
25 Deputy Attorney General.

26 2. Respondent Suzanne Kay Hanson (Respondent) is represented in this proceeding by  
27 attorney Philip H. Heithecker, whose address is: 330 W. 5th Street, Chico, California, 95928-  
28 5506.



1 10. Respondent agrees that her Veterinarian License is subject to discipline and she  
2 agrees to be bound by the Board's probationary terms as set forth in the Disciplinary Order below.

3 CONTINGENCY

4 11. This stipulation shall be subject to approval by the Veterinary Medical Board.  
5 Respondent understands and agrees that counsel for Complainant and the staff of the Veterinary  
6 Medical Board may communicate directly with the Board regarding this stipulation and  
7 settlement, without notice to or participation by Respondent or her counsel. By signing the  
8 stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek  
9 to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails  
10 to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary  
11 Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal  
12 action between the parties, and the Board shall not be disqualified from further action by having  
13 considered this matter.

14 12. The parties understand and agree that Portable Document Format (PDF) and facsimile  
15 copies of this Stipulated Settlement and Disciplinary Order, including PDF and facsimile  
16 signatures thereto, shall have the same force and effect as the originals.

17 13. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an  
18 integrated writing representing the complete, final, and exclusive embodiment of their agreement.  
19 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,  
20 negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary  
21 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a  
22 writing executed by an authorized representative of each of the parties.

23 14. In consideration of the foregoing admissions and stipulations, the parties agree that  
24 the Board may, without further notice or formal proceeding, issue and enter the following  
25 Disciplinary Order:

26 ///  
27 ///  
28 ///

1 **DISCIPLINARY ORDER**

2 IT IS HEREBY ORDERED that Veterinarian License No. 9593 issued to Respondent  
3 Suzanne Kay Hanson is revoked. However, the revocation is stayed and Respondent is placed on  
4 probation for five (5) years on the following terms and conditions.

5 1. Obey All Laws.

6 Respondent shall obey all federal and state laws and regulations substantially related to the  
7 practice of veterinary medicine. Within thirty (30) days of any arrest, Respondent shall notify the  
8 Board. Within thirty (30) days of any conviction, Respondent shall report to the Board and  
9 provide proof of compliance with the terms and conditions of the court order including, but not  
10 limited to, probation and restitution requirements.

11 2. Quarterly Reports and Interviews

12 Respondent shall report quarterly to the Board or its designee, under penalty of perjury, on  
13 forms provided by the Board, stating whether there has been compliance with all terms and  
14 conditions of probation. Omission or falsification in any manner of any information on these  
15 reports shall constitute a violation of probation and shall result in the filing of an accusation  
16 and/or a petition to revoke probation against Respondent's license, registration or permit. If the  
17 final written quarterly report is not made as directed, the period of probation shall be extended  
18 until such time as the final report is received by the Board. Any period(s) of delinquency in  
19 submission of reports as directed may be added to the total period of probation.

20 3. Interview with the Board

21 Within 30 days of the effective date of the Decision, Respondent shall appear in person for  
22 an interview with the Board or its designee to review the terms and conditions of probation.  
23 Thereafter, Respondent shall, upon reasonable request, report or appear in person as directed.

24 4. Cooperation with Board Staff

25 Respondent shall cooperate with the Board's inspection program and with the Board's  
26 monitoring and investigation of Respondent's compliance with the terms and conditions of her  
27 probation. Respondent may receive the assistance of private counsel, but Respondent shall  
28 communicate directly with the Board or its designee, and written communications from the Board



1 will only be sent to the Respondent. Respondent shall make available all patient records, hospital  
2 records, books, logs, and other documents relating to the practice of veterinary medicine to the  
3 Board, upon request.

4 Respondent shall claim all certified mail issued by the Board, respond in a timely manner to  
5 all notices and requests for information, and submit Reports, Identification Update reports or  
6 other reports similar in nature, as requested and directed by the Board or its designee.

7 Respondent is encourage to contact the Board's probation monitoring program representative at  
8 any time she has a question or concern regarding her terms and conditions of probation.

9 5. Probation Monitoring Costs

10 Probation monitoring costs are set at a rate of \$100 per month for the duration of the  
11 probation. These costs shall be payable to the Board on a schedule as directed by the Board or its  
12 designee.

13 6. Changes of Employment or Address

14 Respondent shall notify the Board, and appointed probation monitor, in writing of any and  
15 all changes of employment, location and address within fourteen (14) calendar days of such  
16 change. This includes, but is not limited to, termination or resignation from employment, change  
17 in employment status, and change in supervisors, administrators or directors. Respondent shall  
18 also notify her probation monitor IN WRITING or any changes in residence or mailing address  
19 within fourteen (14) calendar days. Post Office Boxes are accepted for mailing purposes;  
20 however, Respondent must also provide her physical residence address as well.

21 7. No Supervision of Students, Interns, or Residents

22 Respondent shall not supervise students, interns, or residents.

23 8. Notice to Employers

24 During the period of probation, Respondent shall notify all present and prospective  
25 employers of this Decision and the terms, conditions, and restrictions imposed on Respondent by  
26 Decision, as follows:

27 Within thirty (30) days of the effective date of this Decision and within fifteen (15) days of  
28 Respondent undertaking any new employment, Respondent shall cause her supervisor and/or

1 managing licensee (licensee manager) to report to the Board in writing, acknowledging that the  
2 listed individual(s) has/have read Decision, including the terms, conditions and restrictions  
3 imposed. It shall be Respondent's responsibility to ensure that her supervisor and/or licensee  
4 manager submit timely acknowledgement(s) to the Board.

5 Relief veterinarians shall notify employers immediately and require the supervisor and/or  
6 licensee manager to submit timely acknowledgement.

7 9. Notice to Employees

8 Throughout the probationary period, and in a manner that is visible to all licensed,  
9 registered, or permitted veterinary employees at the veterinary premises, Respondent shall post a  
10 notice, provided or approved by the Board, that recites the violations for which Respondent has  
11 been disciplined and the terms and conditions of probation.

12 10. Tolling of Probation

13 Respondent shall notify the Board or its designee in writing within fifteen (15) calendar  
14 days of any periods of non-practice lasting more than thirty (30) calendar days and shall notify  
15 the Board or its designee within fifteen (15) days of Respondent's return to practice. Any period  
16 of non-practice will result in the Respondent's probation being tolled.

17 Non-practice is defined as any period of time exceeding thirty (30) calendar days in which  
18 Respondent is not engaging in the practice of veterinary medicine in California. While tolled for  
19 residing/practicing outside of California, Respondent must comply with the following terms and  
20 conditions of probation: obey all laws, quarterly reports, interview with the Board, tolling of  
21 probation, maintain a current and active California license or registration, and cost recovery.

22 Non-practice is also defined as any period that Respondent fails to engage in the practice of  
23 veterinary medicine in California for a minimum of 24 hours per week for the duration of  
24 probation (except reasonable time away from work for vacations, illnesses, etc.) or as determined  
25 by the Board. While tolled for not meeting the hourly requirement, Respondent shall comply  
26 with all terms and conditions of this Decision.

27 11. Maintain a Valid License

28 At all times while on probation, Respondent shall maintain a current and active license with

1 the Board, including any period during which suspension or probation is tolled. If Respondent's  
2 license, by operation of law or otherwise, expires, upon renewal, Respondent's license shall be  
3 subject to any and all terms of this probation not previously satisfied.

4 12. Violation of Probation

5 If Respondent violates probation in any respect, the Board, after giving Respondent notice  
6 and the opportunity to be heard, may revoke probation and carry out the disciplinary order that  
7 was stayed. If an accusation or petition to revoke probation is filed against Respondent during  
8 probation, or if the Attorney General's office has been requested to prepare any disciplinary  
9 action against Respondent's license, the Board shall have continuing jurisdiction until the matter  
10 is final, and the period of probation shall be extended until the matter is final. No petition for  
11 modification or termination of probations shall be considered while there is an accusation or  
12 petition to revoke probation pending against Respondent.

13 13. License Surrender While on Probation/Suspension

14 Following the effective date of this Decision, should Respondent cease to practice  
15 veterinary medicine due to retirement or health issues, or be otherwise unable to satisfy the terms  
16 and conditions of probation, Respondent may tender her license to practice veterinary medicine to  
17 the Board for surrender. The Board or its designee has the discretion to grant the request for  
18 surrender or to take any other action it deems appropriate and reasonable. Upon formal  
19 acceptance of the license surrender, Respondent will no longer be subject to the terms and  
20 conditions of probation. The surrender constitutes a record of discipline and shall become a part  
21 of the Respondent's license history with the Board.

22 Respondent must relinquish her license to the Board within ten (10) days of receiving  
23 notification from the Board that the surrender has been accepted.

24 14. Completion of Probation

25 All costs for probation monitoring and/or mandatory premises inspections shall be borne by  
26 Respondent. Failure to pay all costs due shall result in an extension of probation until the matter  
27 is resolved and costs paid or a petition to revoke filed. Upon successful completion of probation  
28 and all payment of all fees due, Respondent's license will be fully restored.

1           15. Cost Recovery and Payment of Fines

2           Pursuant to Section 125.3 of the California Business and Professions Code, within thirty  
3 (30) days of the effective date of this Decision, Respondent shall pay to the Board its enforcement  
4 costs including investigation and prosecution in the amount of \$1,717.50 or in a Board-approved  
5 payment plan, within six (6) months before the end of the probation term. Cost recovery will not  
6 be tolled.

7           16. Rehabilitation Program – Alcohol or Drug

8           Within thirty (30) days of the effective date of this decision, Respondent shall submit in  
9 writing a(n) alcohol/drug rehabilitation program in which Respondent shall participate (for the  
10 duration of probation/for one/for two years) to the Board for its prior approval. Respondent shall  
11 provide documentary evidence in the quarterly reports to the Board of continuing satisfactory  
12 participation in this program. All costs shall be borne by Respondent.

13           Components of the treatment contract shall be relevant to the violation and to the  
14 Respondent's current status in recovery or rehabilitation. The components may include, but are  
15 not limited to: restrictions on practice and work setting, random biological fluid testing,  
16 abstinence from drugs and alcohol, use of worksite monitors, participation in chemical  
17 dependency rehabilitation programs or groups, psychotherapy, counseling, psychiatric evaluation,  
18 and other appropriate rehabilitation or monitoring programs. All costs of participating in the  
19 program(s) shall be borne by the Respondent.

20           17. Submit to Drug Testing

21           Respondent shall immediately submit to drug testing, at Respondent's cost, upon request by  
22 the Board or its designee. There will be no confidentiality in test results; positive test results will  
23 be immediately reported to the Board and to Respondent's current employer.

24           Respondent shall make daily contact as directed by the Board or its designee to determine if  
25 she must submit to drug testing. Respondent shall submit to drug testing on the same day that she  
26 is notified that a test is required.

27           Any confirmed positive test for alcohol or any drug not lawfully prescribed by a licensed  
28 practitioner as part of a documented medical treatment shall result in a cease practice order

1 resulting in a period of nonpractice/suspension from work by Respondent and may be a cause for  
2 revocation of probation. Respondent may not resume the practice of veterinary medicine in any  
3 form until notified by the Board in writing.

4 18. Abstain from Controlled Substances

5 Respondent shall completely abstain from the personal use or possession of controlled  
6 substances, as defined in the California Uniform Controlled Substances Act (Health and Safety  
7 Code section 11000 et seq.), and dangerous drugs as defined in Business and Professions Code  
8 Section 4022, except for medication lawfully prescribed to Respondent by a licensed practitioner  
9 for a bona fide illness. Upon request of the Board or its designee, Respondent shall provide  
10 documentation from the licensed practitioner that the prescription for the drug was legitimately  
11 issued and is a necessary part of Respondent's treatment.

12 19. Abstention from Alcohol Use

13 Respondent shall abstain completely from the use of products or beverages containing  
14 alcohol.

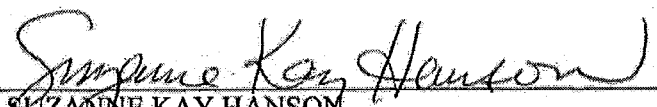
15 20. Fine

16 Respondent shall pay to the Board a fine in the amount of \$5,000 pursuant to Business and  
17 Professions Code sections 4875 and 4883. Respondent shall make said payments on a payment  
18 plan approved by the Board.

19  
20 ACCEPTANCE

21 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully  
22 discussed it with my attorney, Philip H. Heithecker. I understand the stipulation and the effect it  
23 will have on my Veterinarian License. I enter into this Stipulated Settlement and Disciplinary  
24 Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order  
25 of the Veterinary Medical Board.

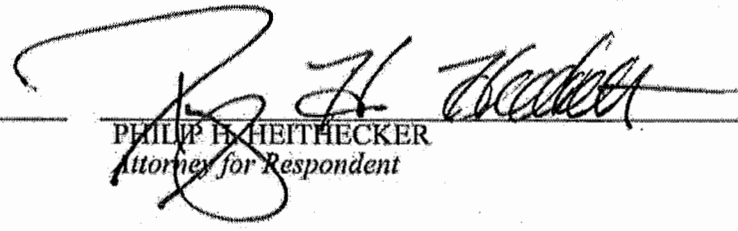
26  
27 DATED: 6-28-19

  
28 SUZANNE KAY HANSON  
Respondent

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I have read and fully discussed with Respondent Suzanne Kay Hanson the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: 6.28.19



PHILIP H. HEITHECKER  
*Attorney for Respondent*

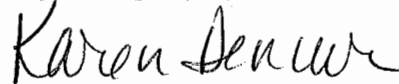
ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Veterinary Medical Board.

Dated: 7/22/19

Respectfully submitted,

XAVIER BECERRA  
Attorney General of California  
JANICE K. LACHMAN  
Supervising Deputy Attorney General



KAREN R. DENVER  
Deputy Attorney General  
*Attorneys for Complainant*

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**Exhibit A**

**Accusation No. 4602018000478**

1 XAVIER BECERRA  
Attorney General of California  
2 JANICE K. LACHMAN  
Supervising Deputy Attorney General  
3 KAREN R. DENVER  
Deputy Attorney General  
4 State Bar No. 197268  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 210-7886  
Facsimile: (916) 327-8643  
7 *Attorneys for Complainant*

8  
9 **BEFORE THE**  
**VETERINARY MEDICAL BOARD**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12  
13 In the Matter of the Accusation Against:

Case No. 4602018000478

14 **SUZANNE KAY HANSON**  
22 River Wood Loop  
15 Chico, CA 95926-3075

**A C C U S A T I O N**

16 **Veterinarian License No. 9593**

17 Respondent.

18  
19 Complainant alleges:

20 **PARTIES**

21 1. Jessica Siefertman (Complainant) brings this Accusation solely in her official capacity  
22 as the Executive Officer of the Veterinary Medical Board, Department of Consumer Affairs.

23 2. On or about June 19, 1987, the Veterinary Medical Board issued Veterinarian License  
24 Number 9593 to Suzanne Kay Hanson (Respondent). The Veterinarian License was in full force  
25 and effect at all times relevant to the charges brought herein and will expire on November 30,  
26 2019, unless renewed.

27 ///

28 ///



1 JURISDICTION

2 3. This Accusation is brought before the Veterinary Medical Board (Board), Department  
3 of Consumer Affairs, under the authority of the following laws. All section references are to the  
4 Business and Professions Code unless otherwise indicated.

5 4. Section 118(b) of the Code provides, in pertinent part, that the expiration of a license  
6 shall not deprive a board of jurisdiction to proceed with a disciplinary action during the period  
7 within which the license may be renewed, restored, reissued or reinstated. Under Business and  
8 Professions Code section 4843.5, the Board may renew an expired license at any time within five  
9 years after the expiration.

10 5. Section 4875 of the Code provides, in pertinent part, that the Board may revoke or  
11 suspend the license of any person to practice veterinary medicine, or any branch thereof, in this  
12 state after notice and hearing for any causes provided in the Veterinary Medicine Practice Act  
13 (Bus. & Prof. Code, §4800, et seq.). In addition, the Board has the authority to assess a fine not  
14 in excess of \$5,000 against a licensee for any of the causes specified in section 4883 of the Code.  
15 Such fine may be assessed in lieu of, or in addition to, a suspension or revocation.

16 STATUTORY PROVISIONS

17 6. Section 490 of the Code provides, in pertinent part, that a board may suspend or  
18 revoke a license on the ground that the licensee has been convicted of a crime substantially  
19 related to the qualifications, functions, or duties of the business or profession for which the  
20 license was issued.

21 7. Section 493 of the Code states:

22 Notwithstanding any other provision of law, in a proceeding conducted by a board within  
23 the department pursuant to law to deny an application for a license or to suspend or revoke a  
24 license or otherwise take disciplinary action against a person who holds a license, upon the  
25 ground that the applicant or the licensee has been convicted of a crime substantially related to the  
26 qualifications, functions, and duties of the licensee in question, the record of conviction of the  
27 crime shall be conclusive evidence of the fact that the conviction occurred, but only of that fact,  
28 and the board may inquire into the circumstances surrounding the commission of the crime in

1 order to fix the degree of discipline or to determine if the conviction is substantially related to the  
2 qualifications, functions, and duties of the licensee in question.

3 As used in this section, 'license' includes 'certificate,' 'permit,' 'authority,' and  
4 'registration.'

5 8. Section 4883 of the Code states, in pertinent part:

6 The board may deny, revoke, or suspend a license or assess a fine as provided in Section  
7 4875 for any of the following:

8 (a) Conviction of a crime substantially related to the qualifications, functions, or duties of  
9 veterinary medicine, surgery, or dentistry, in which case the record of the conviction shall be  
10 conclusive evidence.

11 ...

12 (g) Unprofessional conduct, that includes, but is not limited to, the following:

13 ...

14 (B) The use of any of the dangerous drugs specified in Section 4022, or of alcoholic  
15 beverages to the extent, or in any manner as to be dangerous or injurious to a person licensed  
16 under this chapter [the Veterinary Medicine Practice Act], or to any other person or to the public,  
17 or to the extent that the use impairs the ability of the person so licensed to conduct with safety the  
18 practice authorized by the license.

19 9. A plea or verdict of guilty or a conviction following a plea of nolo contendere made  
20 to a charge of a felony or of any offense related to the practice of veterinary medicine or the  
21 practice of a veterinary technician is deemed to be a conviction within the meaning of this article.  
22 The board may order the license or registration to be suspended or revoked, or assess a fine as  
23 provided in Section 4883 or may decline to issue a license or registration, when the time for  
24 appeal has elapsed, or the judgment of conviction has been affirmed on appeal or when an order  
25 granting probation is made suspending the imposition of sentence, irrespective of a subsequent  
26 order under the provisions of Section 1203.4, 1210.1, or 3063.1 of the Penal Code allowing that  
27 person to withdraw his or her plea of guilty and to enter a plea of not guilty, or setting aside the  
28 verdict of guilty, or dismissing the accusation, information, or indictment.

1 COST RECOVERY

2 10. Section 125.3 of the Code provides, in pertinent part, that a Board may request the  
3 administrative law judge to direct a licentiate found to have committed a violation or violations of  
4 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
5 enforcement of the case.

6 FIRST CAUSE FOR DISCIPLINE

7 (Criminal Conviction)

8 11. Respondent's license is subject to disciplinary action pursuant to Code sections 490  
9 and 4883(a), in that on or about February 21, 2018, in the criminal proceeding entitled, *People v.*  
10 *Suzanne Kay Hanson* (Super. Ct. Sutter County, Case No. CRTR 17-3419, Respondent was  
11 convicted by the Court on her plea of nolo contendere to a misdemeanor violation of Vehicle  
12 Code section 23152(a) (driving a vehicle while under the influence of alcohol), a crime  
13 substantially related to the qualifications, duties and functions of a veterinarian. The  
14 circumstances of the crime are that on or about Tuesday, November 21, 2017, at approximately  
15 7:30 a.m., Respondent was driving a vehicle and was involved in a non-injury collision with a  
16 California Highway Patrol (CHP) patrol vehicle. A California Highway Patrol officer arrived at  
17 the scene and observed that Respondent's eyes were watery and her speech was slurred.  
18 Respondent was unable to satisfactorily perform field sobriety tests as instructed by the officer,  
19 and her preliminary alcohol screening test read .256 percent blood alcohol content.

20 SECOND CAUSE FOR DISCIPLINE

21 (Dangerous Use of Alcohol)

22 12. Respondent's license is subject to disciplinary action under Code section  
23 4883(g)(2)(B) in that she used alcoholic beverages in a dangerous manner when she operated a  
24 motor vehicle while under the influence of alcohol on November 21, 2017, as described in  
25 paragraph 11, above.

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PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Veterinary Medical Board issue a decision:

1. Revoking or suspending Veterinarian License Number 9593, issued to Suzanne Kay Hanson;
2. Assessing a fine against Suzanne Kay Hanson not in excess of \$5,000 for any of the causes specified in Business and Professions Code section 4883;
3. Ordering Suzanne Kay Hanson to pay the Veterinary Medical Board the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;
4. Taking such other and further action as deemed necessary and proper.

DATED: April 5, 2019

  
JESSICA SIEFERMAN  
Executive Officer  
Veterinary Medical Board  
Department of Consumer Affairs  
State of California  
Complainant

SA2019101321  
13588481.docx

# **Exhibit 4**



Rothschild  
Wishek + Sands LLP

April 1, 2022

Veterinary Medical Board  
Attention: Formal Discipline Unit  
1747 N. Market Blvd., Suite 230  
Sacramento, CA 95834-2978

RECEIVED

APR 04 2022

VMB/RVTC

Re: Petition for Termination of Probation  
Suzanne Kay Hanson, DVM  
License No. 9593  
Case No. 4602018000478

To Whom it May Concern:

This office represents Suzanne Hanson, DVM in her efforts to petition the Veterinary Medical Board of California ("Board") for termination of probation. Dr. Hanson has been a licensed veterinarian practicing in Northern California for almost thirty-five (35) years. Dr. Hanson's veterinarian license was revoked, revocation stayed, and placed on a 5-year period of probation in Case No. 4602018000478 effective September 25, 2019. The stayed revocation and placement on probation is the lone disciplinary action against Dr. Hanson in more than three decades of her practice as a veterinarian.

The Board took this disciplinary action following Dr. Hanson's February 21, 2018 misdemeanor conviction for violating Vehicle Code section 23152(a) (driving under the influence of alcohol). The arrest underlying that conviction occurred on or about November 21, 2017. Dr. Hanson had not previously suffered an arrest or conviction nor has she since suffered an arrest or conviction. Dr. Hanson complied with the conditions of her 3-year period of criminal probation and as is evidenced by Exhibit H attached hereto, on January 14, 2022, the Sutter County Superior Court dismissed the conviction from Ms. Hanson's criminal record.

Dr. Hanson is now sixty-four (64) years old and in her narrative statement attached hereto as Exhibit B, fully acknowledges her alcoholism along with the personal and professional triggers that led her down the path of addiction. As is further detailed in Dr. Hanson's attached statement, although she suffered a setback following her completion of a 30-day residential treatment program, she has now maintained her sobriety since her probation began over two and one half (2 ½) years ago. That sobriety is verified by licensed marriage and family therapist and certified alcohol and drug counselor Francine Farrell, a letter from whom is attached hereto as Exhibit C. As she writes in her letter, Ms. Farrell monitors Dr. Hanson's recovery as the area administrator for the Pacific Assistance Group ("PAG"), the program Dr. Hanson chose to satisfy the probation condition requiring her to enroll in an alcohol or drug rehabilitation program. As Dr. Hanson writes in her narrative statement, she intends to continue her participation in PAG irrespective of the Board's decision on her petition to terminate the remaining balance of her probation.

T 916.444.9845

F 916.640.0027

765 University Avenue Sacramento, CA 95825

Exh. 4, p. 001

Dr. Hanson is petitioning the Board for termination of probation for a multitude of reasons. First, she has a strong recovery program to prevent relapse, and thus formal monitoring by the Board is no longer necessary to ensure public safety. Second, as she is approaching retirement, she would like the freedom to travel internationally, something she has been unable to do while on probation. Third, she would like to work less than the required hours of practice contained in the 10<sup>th</sup> provision of her probationary agreement. Fourth and most seriously, is the unfortunate reality that Dr. Hanson was recently diagnosed with metastatic breast cancer for which she will be facing multiple doctor appointments, diagnostics and treatments for the foreseeable future. This uncertainty in her availability is likely to conflict with the Board's testing requirements and has also caused Dr. Hanson to reflect upon how best to prioritize her time between working the minimum hours required of her in her probation agreement or instead maximizing time with her loved ones.

Dr. Hanson's recovery journey has not been entirely seamless. However, it is evident when reviewing the attached materials that Dr. Hanson has appropriate insight into her struggles, her failures, and what ultimately allowed her to fully embrace not just abstinence, but true recovery. Upon application of the relevant statutes and regulations governing the criteria for rehabilitation and petitions for termination of probation, the Board will be assured that granting Dr. Hanson the relief requested herein would pose no risk of harm to the public.

***Burden and Rehabilitation Criteria:***

Dr. Hanson bears the burden of establishing her fitness for early termination of probation and must do so by clear and convincing evidence.<sup>1</sup> "The courts have defined clear and convincing evidence as evidence which is so clear as to leave no substantial doubt and as sufficiently strong to command the unhesitating assent of every reasonable mind. It has been said that a preponderance calls for probability, while clear and convincing proof demands a high probability."<sup>2</sup>

Business and Professions Code § 4887 provides, in relevant part, that a person whose license or registration has been placed on probation may petition the Board for early termination of probation after at least two years of probation when the probation ordered was that of three years or more.<sup>3</sup> The petition "shall be accompanied by at least two verified recommendations from veterinarians licensed by the board who have personal knowledge of the activities of the petitioner since the disciplinary penalty was imposed."<sup>4</sup> The petition shall not be considered while the petitioner is under sentence for any criminal offense, including any period during which the petitioner is on court-imposed probation or parole.<sup>5</sup>

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<sup>1</sup> Evid. Code, § 500; *Flanzer v. Board of Dental Examiners* (1990) 220 Cal.App.3d 1392, 1398; *Housman v. Board of Medical Examiners* (1948) 84 Cal.App.2d 308, 315.

<sup>2</sup> *In re Terry D.* (1978) 83 Cal.App.3d 890, 899; (internal citations omitted).

<sup>3</sup> Bus. & Prof. Code, § 4887, subd. (a)(1).

<sup>4</sup> Bus. & Prof. Code, § 4887, subd. (b).

<sup>5</sup> Bus. & Prof. Code, § 4887, subd. (d).

There are no impediments to considering the petition in this matter. More than two years have elapsed since Dr. Hanson's probation began on September 25, 2019. As is evidenced by the letters of Dr. Daniel Gebhart and Dr. Erin Portillo attached within Exhibit D, Dr. Hanson's petition is accompanied by two verified recommendations from veterinarians who have personal knowledge of her activities since Dr. Hanson was placed on probation. Dr. Hanson also satisfactorily completed three years of informal criminal probation stemming from the conviction which triggered the disciplinary action and the Sutter County Superior Court's Order for Dismissal attached hereto as Exhibit H confirms that Dr. Hanson is not under sentence for any other criminal offense.<sup>6</sup>

In reviewing Dr. Hanson's petition, the Board may consider all her activities since the disciplinary action was taken, the offense for which she was disciplined, her activities since the license or registration was in good standing, and Dr. Hanson's rehabilitation efforts, general reputation for truth, and professional ability.<sup>7</sup> The amount of rehabilitation evidence required varies according to the seriousness of the misconduct.<sup>8</sup> Moreover, the evidentiary significance of misconduct is greatly diminished by the passage of time and the absence of similar, more recent conduct.<sup>9</sup> Passages from Dr. Hanson's narrative statement and letters from colleagues aware of her conviction, recovery group monitor and AA sponsor are excerpted later herein to demonstrate that her activities since the disciplinary action was taken reflect a character for truthfulness along with a dedication to living a sober lifestyle.

Much of the above case and statutory law is reflected by the provisions of California Code of Regulations, title 16, § 2041, wherein the Board has set forth the following rehabilitation criteria when evaluating a petition for reinstatement or petition for termination of probation:

- a. The nature and severity of the act(s) or crime(s) under consideration as grounds for denial.
- b. Evidence of any act(s) committed subsequent to the act(s) or crime(s) under consideration as grounds for denial which also could be considered as grounds for denial under Section 480 of the code.
- c. The time that has elapsed since commission of the act(s) or crime(s) referred to in subsections (a) or (b).
- d. The extent to which the applicant has complied with any terms of parole, probation, restitution, or any other sanctions lawfully imposed against the applicant.
- e. Evidence, if any, of rehabilitation submitted by the applicant.

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<sup>6</sup> A condition precedent to a criminal charge being dismissed pursuant to Penal Code § 1203.4 is that the individual seeking relief not be charged with or under sentence for any other criminal offense.

<sup>7</sup> Bus. & Prof. Code, § 4887, subd. (b).

<sup>8</sup> *In re Menna* (1995) 11 Cal.4th 975, 987.

<sup>9</sup> *Kvasnik v. State Bar* (1990) 50 Cal.3d 1061, 1070.



Application of these rehabilitation criteria to the materials attached hereto will assure the Board that formal monitoring of Dr. Hanson is no longer necessary to ensure the public is adequately protected.

***Application of Rehabilitation Criteria:***

**A. Nature and Severity of the Crime Under Consideration**

Dr. Hanson is expected to acknowledge at hearing that her arrest and conviction for driving under the influence, and particularly the elevated range of her blood alcohol content at the time of her arrest, make her conduct more serious than the “average” driving under the influence offense. However, her actions were a symptom of the disease of addiction, not a reflection of some defect in Dr. Hanson’s character. Therefore, despite the seriousness of her conduct, her treatment and cure of the underlying cause of that conduct mitigates the first criteria provided by § 2041(e).

In the following passage from her narrative statement, Dr. Hanson describes with painstaking detail the conduct which led to her November 21, 2017 arrest and the incredible shame and embarrassment she felt immediately following her arrest:

My arrest for driving under the influence occurred on 11/21/2017. The day and evening of the 20<sup>th</sup>, the day before my arrest, I was packing and getting the house ready for the cat-sitter for what I thought would be a Thanksgiving vacation. I was drinking all day and I remember staying up late that night and being intoxicated. Such was the nature of my addiction at that time that when I got up early for the morning flight and saw there was unfinished alcohol on my counter, I made a drink before driving to the Sacramento Airport where I was scheduled to fly out of to visit my brother for Thanksgiving. While driving through Yuba City, my vehicle hit the back of a CHP vehicle while rolling forward at a stoplight. I was breathalyzed, arrested and transported for booking. I was processed at the Sutter County Jail and spent the day in a holding cell. Never in my life had I been so ashamed, embarrassed and afraid of what my family would think. As I missed my flight, my brother and my sister very afraid and did not know what happened. I was released from custody at about 8pm at which time I finally texted my family. However, I was not emotionally able to talk to them for the next few weeks due to the shame I felt over my actions and what my life had become. I even recall thinking about how grateful I was that my parents were no longer alive to experience the disappointment and shame of their daughter’s actions.<sup>10</sup>

Dr. Hanson thereafter continues her narrative statement by describing her early efforts in recovery, her initial denial of her alcoholism, and her relapse after a five-month period of abstinence following receipt of the Board’s Accusation in Case No. 4602018000478:

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<sup>10</sup> February 28, 2022 Statement of Suzanne Hanson, DVM, Exhibit B.

At this time and for years prior, I had not been self-aware enough to admit to myself that my drinking was abnormal and that I was an alcoholic. I'd become increasingly isolated, living alone and avoiding friends as it would interfere with my drinking. Unfortunately, the DUI was not enough of a wake-up call. In the process of the legal/DMV consequences of the DUI, I did agree to go to a treatment at a 30-day alcohol/drug rehabilitation facility on the advice of my lawyer. I valued that experience, but upon returning home I returned to drinking. I knew that I had gained something through the treatment program as despite my drink [sic], I started going to local AA meetings and was abstinent for the last 5 months of 2018. But by the time I received the big manilla envelope from the DOJ/VMB, I was back to drinking. I was completely blind-sided by the accusation and spun into fear and anxiety again. My probation started 9/25/2019, and I remember counting over and over again when I could have my last drink.<sup>11</sup>

The candid manner in which Dr. Hanson describes her early efforts in suggests she has fully embraced her 12-step program and developed meaningful insight into how she came to be in the position she finds herself in today. Through the strength of her recent recovery efforts, she has come to appreciate that she became an alcoholic long before her November 21, 2017 arrest. That she admits to the Board that the 30-day residential treatment program she completed between February and March 2018 was insufficient to prevent a relapse and that she was instead counting down the days of her last drink before beginning probation is another expression of the genuine candor we expect her to demonstrate when testifying at the hearing set on her petition.

#### B. No Further Acts of Misconduct

Although Dr. Hanson admits her DUI arrest and subsequent conviction did not entirely prevent her from drinking, that drinking did not result in any further arrest or conviction. Nor has the Board received any complaint which suggests there have been concerns of Dr. Hanson being impaired while serving as a veterinarian at VCA Valley Oak Veterinary Center where she has been employed for approximately fifteen (15) years. Instead, as the November 11, 2017 arrest prompting Dr. Hanson's February 21, 2018 conviction is the lone such act of misconduct in her nearly 35-year career, the 2<sup>nd</sup> rehabilitation criteria is squarely in favor of granting her the relief requested herein.

#### C. Passage of Time Since November 21, 2017 Arrest

By the time a hearing commences on Dr. Hanson's petition for termination of probation, five years will likely have elapsed since her arrest. The following passages from her statement suggest that Dr. Hanson has spent countless hours reflecting on how she became an alcoholic and recognizing the triggers which may have accelerated her down the path toward addiction:

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<sup>11</sup> *Id.*

Veterinarians, and all medical professionals live in a culture of contradictions. We are highly trained and skilled doctors, but are also constantly reminded that medicine is not an exact science; there will be uncertainties and no guarantees of positive outcomes. On the other hand, quick and confident decision making is expected and poor outcomes are unacceptable. It is not a culture that is supportive of human weakness and fallibility. By the late 1990s, I was experiencing chronic anxiety, fear and depression as I tried to live with these expectations. Alcohol was a way to mute these feelings. This is a dysfunctional coping method that I have since learned unfortunately effects countless medical professionals. At the time, however, I lacked the awareness or tools necessary to address my feelings. What started as a daily habit of post-work drinking became a much more serious problem.

In addition to these professional stresses, I experienced a great personal loss. In Dec 2007 my partner Ed was injured in a bicycling accident, sustaining a catastrophic injury. He suffered a mid-cervical spinal injury and became quadriplegic. He could breathe without assistance, but lost all use of his lower arms, hands and fingers. After returning from 3 months in the hospital, he required constant in-home care. We hired help during the day and initially I tried to cover the nights, but I was still working 3-4 days a week at that time and it was too much. Eventually we had to hire 24/7 professional in-home care. Ed lived for another 4 ½ years, dying in 2012. I had four years of pre-grieving the loss of a companion and a lifestyle of travelling, cycling and dining out. Losing him and the daily activities around the house left a huge hole that I filled with alcohol. I hate to reference Ed's tragic situation as a part of my addiction history; however, I do think it contributed to depression and accelerated my drinking to an alcoholic level.<sup>12</sup>

It is evident from the above passages from Dr. Hanson's statement that the time which has elapsed since her arrest, particularly the past two-and-one-half years in which she has truly embraced recovery, has allowed her to delve deeply inward and recognize now what she did not previously recognize about her relationship with alcohol. She recognizes alcohol as being a "dysfunctional coping method" and her lacking the appropriate "awareness or tools" to address her feelings about the professional pressures that accompany the practice of medicine. It is further apparent that she has been able to appropriately grieve, with a clean and sober mind, the loss of her significant other Ed, an incredibly traumatic event which unsurprisingly "accelerated [her] drinking to an alcoholic level."

Recognizing *why* she was abusing alcohol, not simply that she was abusing alcohol, is of course an important step in preventing recurrence of the conduct which prompted her placement on probation. Only with such recognition can one formulate a plan on how best to healthily cope with life's stressors and personal triggers. Dr. Hanson has been able to do just that by authoring the Relapse Prevention Plan that is attached hereto as Exhibit E.

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<sup>12</sup> *Id.*

#### D. Satisfactory Completion of Probation and Dismissal of Lone Conviction

As was referenced above, attached hereto as Exhibit H is an Order for Dismissal signed by the Sutter County Superior Court dismissing the criminal matter upon which the Board's disciplinary action was based. The Court's determination that it was appropriate to dismiss Dr. Hanson's conviction from her criminal record confirms that she satisfactorily completed probation for the entire period thereof and has not been charged with the commission of any other offense.<sup>13</sup>

#### E. Significant Rehabilitative Efforts

Dr. Hanson first credits the Board's probation for putting her on the "true path towards recovery" in her narrative statement. As she describes therein, although the Board did not mandate specific recovery modalities in placing her on probation, she resumed her participation in Alcoholics Anonymous meetings, obtained a recovery sponsor, put in place worksite monitors and with the help of a counselor, formulated a Relapse Prevention Plan that was approved by the Board.

In that Prevention Plan, Dr. Hanson writes that it is her "long-term goal and daily intention" to live life soberly and to continue her "personal journey of recovery and discovery." In specifically describing what her plan consists of, Dr. Hanson references her regular attendance in AA meetings, meeting with her sponsor, continuing the ongoing process of working the 12 steps of the program and making time daily for recovery reading and journaling. Very important for her, given her generally shy nature and prior inability to express her feelings regarding the pressure of practicing veterinary medicine, is that she attends an "All DVM" meeting once a week in which she is able to comfortably share with other veterinary doctors in recovery.

As she writes in her letter attached within Exhibit D, Maitrey Badami is a professor of Legal Studies at California State University Chico. Ms. Badami has maintained her sobriety for over twenty-five (25) years and has sponsored Dr. Hanson since March 2020. Of her experiences sponsoring Dr. Hanson, Ms. Badami writes in part as follows in her attached letter:

In the time I have worked with Suzanne, I have found her to be very honest and forthcoming in our conversations, despite her obvious shyness in meetings and reticence to speak in front of groups. She has been candid about her fears and concerns, places where she did not understand or relate to our AA literature, and her anxiety about reaching out to other alcoholics (an important part of cultivating a support network). **Despite all of her fears, she has steadfastly done the work of the 12 steps, acknowledging her alcoholism, seeking a connection with a "power greater than herself," forming a network with other recovering people** (in particular, she has gone to great lengths to connect with medical professionals in recovery, who share some of the same challenges she is dealing with), and **making**

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<sup>13</sup> Penal Code § 1203.4

**amends to people she harmed in the course of her drinking. She has consistently pushed herself to follow my suggestions (for example, making outreach calls to other alcoholics in the program), even when they made her feel uncomfortable or awkward.**<sup>14</sup>

The Board will find the above passage from a 25-year veteran in recovery to be an accurate depiction of Dr. Hanson at the hearing set on the attached petition. Dr. Hanson is, as she is also described by others who wrote on her behalf, a generally shy and private person. That shyness is something which Dr. Hanson acknowledges she previously treated by seeking solace in alcohol. However, by working the 12 Steps and with the help of others in recovery, particularly health-care professionals in recovery, she has overcome that shyness to candidly address her fears and concerns. This work by Dr. Hanson is an important indicator that her rehabilitative efforts are working.

Ms. Badami continues her letter by similarly describing her impressions that Dr. Hanson's recovery program is now something she is doing for herself and for the betterment of her quality of life, rather than to comply with the conditions of her probation:

In the course of our working together, I have observed her to become less guarded, less defensive, and more willing over time. **She has notably shifted from doing recovery out of an obligation to the legal system or her profession, into pursuing recovery because it brings relief, freedom from anxiety, and peace of mind.** While no one has the ability to predict with perfect accuracy who will "make it" and experience a life of permanent sobriety (I continue to characterize my own 25-year sobriety as one day at a time), **from everything I have observed about Suzanne's work in our program, she is extremely likely to continue working the program, and to remain sober, after her probation has ended. Her motivation has shifted from an externally-driven desire to stay out of "trouble" into an internal drive to experience the benefits of sobriety.**<sup>15</sup>

**This became very clear when she received her cancer diagnosis** and we had some real heart to hearts about what that meant. **In the course of our conversations, she revealed that she has a strong desire to stay sober, no matter what, and that she understands that nothing life throws at her will be improved in any way by taking a drink.** I am confident that she will remain sober, law-abiding, and continue to be a productive member of society upon the termination of her probation.<sup>16</sup>

It is important that Ms. Badami notes even after 25 years, she characterizes her recovery as "one day at a time." Yet, her opinion that Dr. Hanson is "extremely likely" to remain in recovery and remain sober should the relief requested herein be granted should not be taken lightly. Ms. Badami has

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<sup>14</sup> Letter of Maitrey Badami, attached within Exhibit D (emphasis added).

<sup>15</sup> *Id.* (emphasis added).

<sup>16</sup> *Id.* (emphasis added).

likely seen many “come and go” in recovery, so to speak, in the 25 years of her sobriety, and the manner in which she describes Dr. Hanson’s attitude about sobriety should assure the Board that terminating formal supervision of Dr. Hanson’s recovery will not present a danger to public safety.

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Dr. Hanson also credits the support of her co-workers as an important aspect of rehabilitation and her Prevention Plan as they have served as worksite monitors and contributed to her becoming a “more attentive doctor and a happier person overall”. Three of those co-workers wrote letters of support under the penalty of perjury endorsing Dr. Hanson’s petition, attached within Exhibit D.

Erin Portillo is a Doctor of Veterinary Medicine and medical director of VCA Valley Oak Veterinary Center where she has worked with Dr. Hanson since 2007. In her attached letter, Dr. Portillo describes that she has worked closely with Dr. Hanson on numerous cases, attests to Dr. Hanson providing low cost fare for the local animal shelter in Chico, and describes Dr. Hanson’s volunteer efforts at other animal shelters when not working at Valley Oak. It is evident from Dr. Portillo’s letter that she would have suspected if Dr. Hanson had relapsed or were at all under the influence during the course of her employment. Dr. Portillo’s letter also acknowledges awareness of the conduct which led to Dr. Hanson’s placement on probation and describes how the latter made a “very public apology” to the doctors of VCA Valley Oak Veterinary Center:

As I mentioned Suzanne is a very private person. After her accident, she sought help and we supported her in her schedule because she is a good person and a valuable member of our team. **During her recovery she made a very public apology to the entire doctor team at our monthly meeting. I can only imagine how difficult that must have been and I have so much respect for her. I admire the grace and dignity she has shown during her recovery and probation. She asks for help when needed and is communicates with us regularly.**

**It is without reservation that I fully support early termination of Suzanne Hanson’s probation.<sup>17</sup>**

Daniel Gebhart is also a Doctor of Veterinary Medicine and serves as co-medical director and part owner of VCA Valley Oak Veterinary Center. Like Dr. Portillo, Dr. Gebhart was moved by the manner in which Dr. Hanson took responsibility for the conduct underlying her placement on probation and apologized to her colleagues. In this respect, Dr. Gebhart writes as follows in his letter attached within Exhibit D:

After her DUI, Dr. Hanson has been a exemplary employee here at VCA Valley Oak. **She apologized in front of her colleagues about being a alcoholic and what she was dealing with in her personal life. She discussed that she was**

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<sup>17</sup> February 14, 2022 Letter of Erin Portillo, DVM, attached within Exhibit D (emphasis added).

**disappointed in herself but most importantly she felt like she let her colleagues down at our hospital. This statement was particularly moving for me, she showed incredible courage and bravery when she discussed her circumstance with us during that doctor meeting. Suzanne has been throughout a lot over the last 10 years and the courage and bravery she presents now is remarkable.**<sup>18</sup>

In concluding his letter, Dr. Gebhart also provides his general impressions of Dr. Hanson's compliance with the conditions of her probation and dedication to her recovery:

I believe Suzanne has shown that she has gone above and beyond during the time she has been on probation. **She checks in quarterly with Dr. Portillo and myself, she attends every doctor meeting and has shown humility and honesty with her probation and the events leading up to it.** She has worked hard on her sobriety, attending AA meetings weekly and going through the steps. **She has been sober now for several years and it has showed in her personality, work ethic and personal life.** I am very proud of Suzanne and I know the rest of her friends, colleagues are as well.<sup>19</sup>

Jeanna Thompson serves as Hospital Manager at VCA Valley Oak Veterinary Center and has worked with Dr. Hanson for approximately three (3) years. Like her other colleagues, Ms. Thompson's letter describes Dr. Hanson as being a quiet but skilled practitioner. Ms. Thompson's letter further confirms that the VCA Valley Oak Veterinary Center has not received a complaint about Dr. Hanson and that the latter is instead "well liked" and "respected" by the facility's staff.

Ms. Thompson's letter similarly describes the manner in which Dr. Hanson notified her colleagues of her placement on probation and the conduct prompting that placement. Ms. Thompson writes that she was "amazed at the amount of humility and grace" in which Dr. Hanson addressed the situation. We expect that Dr. Hanson will present herself consistent with that description when testifying at hearing.

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As she details in her Prevention Plan, another important aspect of Dr. Hanson's recovery is that she has changed her schedule over the last few years to better manage her stress and be more in control of her work. Dr. Hanson's initiative in changing her work schedule to alleviate some of the stress which contributed to her feelings of pressure and isolation during the active period of her addiction is another great indicator that she has been proactive in preventing the circumstances which contributed to her alcoholism.

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<sup>18</sup> March 4, 2022 Letter of Daniel Gebhart, DVM, attached within Exhibit D (emphasis added).

<sup>19</sup> *Id.* (emphasis added).

Along with support of her siblings and self-care, both of which are undoubtedly key aspects of her recovery program, Dr. Hanson also credits her membership in the PAG monitoring program as an invaluable aspect of her rehabilitation. Attached hereto are letters from both Larry Collins, LMFT and Francine Farrell, LMFT describing Dr. Hanson's participation in PAG and endorsing her petition for early termination.

Along with being a licensed marriage and family therapist and previously holding certification as a certified alcohol and drug counselor, Larry Collins serves as the Group Facilitator for the Pacific Assistance Group ("PAG") in Chico, California. In his letter attached within Exhibit D, Mr. Collins describes his work in the field of recovery dating back thirty-six (36) years, including teaching positions at both the state and community college levels in the areas of psychology and addiction.

Aside from Dr. Hanson's own narrative statement, Mr. Collins' letter provides perhaps the best summary of the former's recovery journey with a candid description of Dr. Hanson's failures and successes. For example, Mr. Collins' letter acknowledges that Dr. Hanson relapsed after participating in an outpatient substance abuse recovery program and completing a residential treatment program. Mr. Collins' letter further references Dr. Hanson's initial cancer diagnosis, depression and sleep issues, and the loss of her partner Ed whose tragic death and impact thereof on Dr. Hanson is referenced in many of the attached materials.

Most importantly, however, Mr. Collins' letter, like Dr. Hanson's own narrative statement, describes her participation in PAG as the true catalyst for her embracing recovery as it was only through her participation in PAG that Dr. Hanson began truly caring for herself, consistently attending AA meetings, and realizing who she was without the presence of alcohol in her life. Through the counseling component of her PAG program, Dr. Hanson was able to appreciate her tendency to be shy and quiet around strangers, her inclination to isolate and how growing up in an alcoholic home may have contributed to her own alcoholism. Mr. Collins' letter suggests Dr. Hanson had not addressed the root causes of her addiction until she embraced the PAG program and all of its various components.

These sentiments are shared by Ms. Farrell, who describes her active involvement in supporting and monitoring Dr. Hanson's recovery since she enrolled in the PAG program effective November 20, 2019. Rather than writing on Dr. Hanson's behalf in a biased manner, Ms. Farrell describes Dr. Hanson as being initially uncertain of what benefit she may derive from participating in PAG aside from proving her compliance with the Board's probation. It appears from Ms. Farrell's letter that the turning point in Dr. Hanson's rehabilitation came when she was introduced to other professionals in recovery and began working the 12-Step program. In this respect, Ms. Farrell writes as follows regarding the change she observed in Dr. Hanson:

Previous resistance turned into a deepening gratitude and acceptance of a new, sober values system and way of life. The benefits of sobriety and of the recovery program



she has built can only be described as transformational. I believe Dr. Hanson would now describe herself as “a grateful alcoholic.”<sup>20</sup>

After describing the components of Dr. Hanson’s PAG agreement, Ms. Farrell writes as follows regarding the former’s compliance with that agreement:

Dr. Hanson has participated in the program fully and has demonstrated meticulous compliance with her PAG program requirements. She has also demonstrated lasting and meaningful changes in attitude and behavior consistent with ongoing abstinence and working a program of recovery.<sup>21</sup>

Ms. Farrell further describes Dr. Hanson as a “very valued member” of her support group and writes that the latter’s “introversion has yielded to more openness and a deep connection with peers in recovery.” Elaborating on the meaningful changes she has observed in Dr. Hanson since her initial apprehension as to the benefits of PAG 2 ½ years ago, Ms. Farrell writes in part:

Dr. Hanson has embraced sobriety. She values her recovery. She is grateful for the new life that sobriety has brought her. We have seen a dramatic changes in her functioning, thinking and behaviors. She demonstrates strong recovery and offers much to newcomers, sharing her “experience, strength and hope.” Her willingness to be open, honest and transparent with herself and others serves as an example to her peers in the program. She is clearly respected and appreciated by fellow group members.<sup>22</sup>

After describing Dr. Hanson’s prognosis for continued sobriety as being “excellent”, Ms. Farrell concludes her letter attached as Exhibit C in the following manner:

**In summary, I would state that Dr. Hanson has undertaken and achieved a meaningful and lasting change in her life as a result of the very painful event that originally brought her into recovery. Her steadfast compliance and acceptance have been well documented, and she has successfully maintained her commitment to sobriety even during difficult challenging periods. As you know, her current health situation could have been a trigger for someone with a weaker commitment to recovery. Instead, she deepened her resolve in living a strong recovery program.**

I believe she is successfully rehabilitated and has the relapse prevention tools she needs to maintain her program. I hope the Veterinary Medical Board and the

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<sup>20</sup> March 28, 2022 letter of Francine Farrell, Exhibit C.

<sup>21</sup> *Id.*

<sup>22</sup> *Id.*

Attorney General's office will see this as worthy of acknowledgment and will move for early termination of probation.<sup>23</sup>

Although it ultimately was insufficient to prevent a relapse, further evidence of Dr. Hanson's rehabilitative efforts since the conduct underlying her disciplinary action was her 30-day residential treatment at Duff's Napa Valley Rehab. Attached hereto as Exhibit F is a letter confirming that treatment.

***Other Relevant Considerations:***

Dr. Hanson's veterinary skill was not called into question in Case No. 4602018000478. However, the following passage from Dr. Gebhart's letter should assure the Board that the former is a veterinarian and person of the highest quality:

I am very proud of Dr. Hanson over the last few years. She is a great employee who works very hard, she is also very compassionate and is a skilled and knowledgeable general surgeon. Suzanne's mood and attitude have been excellent for the last couple years. She is a great team player and is always willing to help others. She is always continuing to learn more and further her veterinary skills. I greatly appreciate her company and consider a great friend and colleague. Suzanne is always punctual and comes into work with a great attitude.

Suzanne is very professional with clients, staff and her fellow colleagues. She is easy to talk to and very helpful along with having a great and witty sense of humor. She is very helpful with our community, volunteering her time at our local shelter (Butte Humane Society and Chico Animal Shelter) spaying and neutering patients for the City of Chico. She donates her time and helps out at the shelter weekly spaying and neutering patients. Suzanne is well received in the veterinary community in Chico California and has been for many years. She dedicated herself to helping out many burned patients during the CAMP fire in 2018 and Bear Fire in 2020 not only here at VCA Valley Oak but also at the shelter.<sup>24</sup>

The manner in which Dr. Hanson is described in the above-excerpted passage—exhibiting an excellent mood and attitude, always willing to help others, continuously improving upon her veterinary skills, always punctual and freely volunteering her time to help others less fortunate than her—is in stark contrast to how Dr. Hanson describes who she was during the active period of her addiction in her narrative statement. That she is now reaping the benefits of sustained sobriety and intends to continue her participation in PAG irrespective of the Board's determination of her petition – a program with more than an 85% success rate – should assure the Board that formal supervision of Dr. Hanson's recovery is no longer necessary to ensure the public remains safe.

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<sup>23</sup> *Id.* (emphasis added).

<sup>24</sup> March 4, 2022 Letter of Daniel Gebhart, DVM, attached within Exhibit D.

Further evidence of Dr. Hanson's commitment to providing only the highest caliber veterinary care can be found attached hereto as Exhibit G, where the Board will find certifications confirming eight-five (85) hours of continuing education since September 1, 2019.

***Conclusion:***

Dr. Hanson fully acknowledges her addiction. Through her efforts in PAG, she has recognized the sources of her addiction and the triggers that accelerated her alcoholism, and has developed a strong and comprehensive support network to prevent relapse. Dr. Hanson has not produced any positive test results while on probation and has meticulously complied with the terms of her probation agreement. She now comes before the Board to petition for termination of probation so that she may spend more time with her loved ones, appropriately confront the recent return of her cancer diagnosis, and hopefully travel internationally as she winds down her professional practice.

Rehabilitation is a state of mind, and the law looks with favor upon rewarding the opportunity to serve, one who has achieved reformation and regeneration.<sup>25</sup> As the materials attached hereto demonstrate that Dr. Hanson has achieved reformation and regeneration, we ask the Board to look reward her rehabilitative efforts by terminating the balance of her probation. On Dr. Hanson's behalf, thank you all for your thoughtful consideration.

Sincerely,

*Amit Singh*

Amit Singh  
asingh@rwslaw.com

AS/bh

Enclosures: As Noted in Attached Exhibit List  
cc: Suzanne Hanson, DVM

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<sup>25</sup> *Pacheco v. State Bar* (1987) 43 Cal.3d 1041, 1058.

**EXHIBIT LIST**

- Exhibit A:** Petition for Modification of Penalty
- Exhibit B:** Narrative Statement of Suzanne Hanson, DVM
- Exhibit C:** Letter of Francine Farrell, MS, LMFT, ICADC
- Exhibit D:** Letters of Support:
- Daniel Gebhart, DVM, VCA Valley Oak Veterinary Center
  - Erin Portillo, MS, DVM, DACVIM, VCA Valley Oak Veterinary Center
  - Jeanna Thompson, VCA Valley Oak Veterinary Center
  - Maitreya Badami, California State University Chico
  - Lisa Emmerich, California State University Chico
  - Larry Collins, M.A., LMFT
- Exhibit E:** Suzanne Hanson Protection Plan to Prevent Relapse
- Exhibit F:** Letter of Lia Willendrup, BA, CATC, Verifying Dr. Hanson's Completion of 30 days of Residential Treatment with Duffy's Napa Valley Rehab
- Exhibit G:** Continuing Education Appendix and Certificates of Completion
- Exhibit H:** Order for Dismissal, Sutter County Superior Court, Case No. CRTR 17-3419

# **EXHIBIT A**



BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY • GAVIN NEWSOM, GOVERNOR  
DEPARTMENT OF CONSUMER AFFAIRS - VETERINARY MEDICAL BOARD  
1747 North Market Blvd., Suite 230, Sacramento, CA 95834-2978  
P (916) 515-5220 | Toll-Free (866) 229-0170 | www.vmb.ca.gov



### PETITION FOR REINSTATEMENT OR MODIFICATION OF PENALTY

**INSTRUCTIONS:** Please type or print neatly. All blanks must be completed; if not applicable enter N/A. If more space is needed attach additional sheets. Attached to this application should be a "Narrative Statement" and two original verified recommendations from a veterinarian licensed by the Board who has personal knowledge of activities since the disciplinary action was imposed.

**TYPE OF PETITION [Reference Business and Professions Code section 4887]**

Reinstatement of Revoked/Surrendered License or Registration
  Modification of Probation
  Termination of Probation

**NOTE:** A Petition for Modification and/or Termination of Probation can be filed together. If you are requesting Modification, you must specify in your "Narrative Statement" the term(s) and condition(s) of your probation that you want reduced or modified and provide an explanation. Please check all boxes above that apply.

**PERSONAL INFORMATION**

NAME: First Middle Last  
 Suzanne Kay Hanson

Other name(s) licensed under, if any:

HOME ADDRESS: Number & Street City State Zip  
 [Redacted]

HOME TELEPHONE NUMBER WORK TELEPHONE NUMBER CELL NUMBER  
 [Redacted] ( ) [Redacted]

E-mail address: CA License or Registration Number  
 [Redacted] 9593

Are you licensed by any other state(s) or country(ies) (please include license number(s), issue date(s), and status of license(s)):

**ATTORNEY INFORMATION (If Applicable)**

Will you be represented by an attorney?  No  Yes (If "Yes," please provide the following information)

NAME: Amit Singh, Rothschild, Wishek and Sands LLP

ADDRESS: 765 University Ave, Sacramento, CA 95825

PHONE: (916) 444-9845

**DISCIPLINARY INFORMATION**

Provide a brief explanation in your "Narrative Statement" as to the cause for the disciplinary action (e.g., negligence or incompetence, self use of drugs or alcohol, extreme departures from sanitary conditions, conviction of a crime, etc.)

Have you ever had your license revoked, suspended, voluntarily surrendered, denied, or placed on probation in any other state or country?  No  Yes

(If Yes, give a brief cause for administrative action or license denial in your "Narrative Statement" section, including dates and discipline ordered (e.g., 5 years probation.)

<b>VETERINARIAN/REGISTERED TECHNICIAN BACKGROUND</b>
Total number of years in veterinary practice:
<b>CONTINUING EDUCATION</b> (List continuing education completed since the date of the disciplinary action)
See attached
<b>CURRENT OCCUPATION OTHER THAN VETERINARIAN OR REGISTERED VET TECHNICIAN</b> (Answer only if currently not practicing as a Veterinarian or Registered Vet Technician)
List employer, address, e-mail address, phone number, job title, and duties:
<b>EMPLOYMENT HISTORY</b> (list for the past 5 years only)
Provide the employer's name, address, phone number, job title and dates of employment:
VCA Valley Oak Veterinary Center
2480 Dr Martin Luther King Jr Parkway Chico, CA 95926
<b>REHABILITATION</b>
Describe any rehabilitative or corrective measures you have taken since your license/registration was disciplined. List dates, nature of programs or courses, and current status. You may include any community service or volunteer work.
See attached Relapse Prevention Plan

**CURRENT COMPLIANCE**

Since the effective date of your last Veterinary Medical Board disciplinary action have you:

- 1. Been placed on criminal probation or parole?  Yes  No
- 2. Been charged in any pending criminal action by any state, local or federal agency or court?  Yes  No
- 3. Been convicted of any criminal offense? (A conviction includes a no contest plea; disregard traffic offenses with a \$100 fine or less.)  Yes  No
- 4. Been charged or disciplined by any other veterinary board?  Yes  No
- 5. Surrendered your license to any other veterinary board?  Yes  No
- 6. Had your licensee manager's premise permit disciplined?  Yes  No
- 7. Had any civil malpractice claims filed against you of \$10,000 or more?  Yes  No
- 8. Become addicted to the use of narcotics or controlled substances?  Yes  No
- 9. Become addicted to or received treatment for the use of alcohol?  Yes  No
- 10. Been hospitalized for alcohol or drug problems or for mental illness?  Yes  No

NOTE: If your answer is "Yes" to any of the above questions, please explain in the "Narrative Statement."

**COST RECOVERY**

Was cost recovery ordered?  Yes  No If yes, what is the remaining balance? 769.50\*

When is payment anticipated? At the end of my Probation \* see attached email to the Board

**DECLARATION**

Executed on March 31 2022, at Chico, C A  
 (City) (State)

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that all statements and documents attached in support of this petition are true and correct.

Suzanne Hanson  
 Petitioner (print name)

Suzanne Hanson 4-1-22  
 Signature

The information in this document is being requested by the Veterinary Medical Board (Board) pursuant to Business and Professions Code section 4887. In carrying out its licensing or disciplinary responsibilities, the Board requires this information to make a determination on your petition for reinstatement or modification of penalty. You have a right to access the Board's records containing your personal information as defined in Civil Code section 1798.3. The Custodian of Records is the Executive Officer at the address shown on the first page.



**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** ? about cost recovery and fine payment 4602018000478  
**Date:** Friday, April 1, 2022 10:23:49 AM  
**Attachments:** [villareal.pdf](#)

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Mr Petersen, My lawyer and I are wrapping up my Early Release package to be sent to the Board. One question is the remaining balance on my Cost Recovery, so I looked on Cal Breeze. It shows \$769.50 remaining on a Cost Recovery of \$1,717.50 and \$3,861.00 on my 5000.00 fine outstanding. The amount of the Fine is stated in my Decision, and the Cost Recovery figure is from a letter I received at my intake interview with the Board, from Sidney Villareal, dated 9/11/19. I've attached a copy of that letter.

Since 11/2019, I've been paying the Board 274.00\$ each month, a combination of pro-rated CR and Fine amounts that was worked out by Ms Villareal. So at \$274.00 X 30 months, that's \$8220.00. It seems that amount should more than cover those fees/fines, with of course an ongoing monthly cost.

Cal Breeze doesn't show a running total of my payments, so none of this makes sense to me. I tried calling the Board this am but was not able to reach a live person. Hopefully you can help me understand this difference in math.

Suzanne Hanson

# **EXHIBIT B**

Dear Members of the Veterinary Medical Board,

I am writing this narrative to accompany my application for Early Termination of Probation. I was placed on Probation by the Board on Sept. 25, 2019 after my November 2017 arrest and February 2018 conviction for driving under the influence. The purpose of this narrative is to briefly describe who I am today, with two and one half years of sobriety, the events surrounding my arrest, my addiction history, my recovery efforts and why I am requesting that the balance of my probationary period be terminated.

Originally, I am from Southern California and moved to Northern California in 1983 to attend veterinary school. I graduated from UC Davis School of Veterinary Medicine in 1987. From 1987 to 1991 I worked at Loomis Basin Veterinary Clinic in Placer County. I moved to Chico in 1991 where I worked as an associate veterinarian until 1996. At that time, I bought a small solo practice in Chico. In 2007 that practice was bought by another local office, that eventually evolved into a multi doctor specialty and emergency practice where I work now. This practice, Valley Oak Veterinary Center, was originally privately owned until it was purchased by VCA/Mars several years ago. Upon first moving to Chico, I became involved in the local veterinary association, and also held a 6-year term on CVMA's Board of Governors. I started working with Chico Animal Services back when I had my own practice. I continue to do both pro bono and paid work for them, and also work for our local SPCA one day a week.

My arrest for driving under the influence occurred on 11/21/2017. The day and evening of the 20<sup>th</sup>, the day before my arrest, I was packing and getting the house ready for the cat-sitter for what I thought would be a Thanksgiving vacation. I was drinking all day and I remember staying up late that night and being intoxicated. Such was the nature of my addiction at that time that when I got up early for the morning flight and saw there was unfinished alcohol on my counter, I made a drink before driving to the Sacramento Airport where I was scheduled to fly out of to visit my brother for Thanksgiving. While driving through Yuba City, my vehicle hit the back of a CHP vehicle while rolling forward at a stoplight. I was breathalyzed, arrested and transported for booking. I was processed at the Sutter County Jail and spent the day in a holding cell. Never in my life had I been so ashamed, embarrassed and afraid of what my family would think. As I missed my flight, my brother and my sister very afraid and did not know what happened. I was released from custody at about 8pm at which time I finally texted my family. However, I was not emotionally able to talk to them for the next few weeks due to the shame I felt over my actions and what my life had become. I even recall thinking about how grateful I was that my parents were no longer alive to experience the disappointment and shame of their daughter's actions.

After being released from the jail that night, I got a room and stayed overnight in Yuba City. On Nov 22, I arranged to have my car towed back to Chico. As I was "on vacation" I had all week to stew in my self-pity and despair. Within several days I received a letter from the VMB that they had been notified of the DUI. Amazingly, I never put 2 + 2 together and had no thought that there might be professional consequences as a result of my arrest. I returned to work the next week. Some of my co-workers knew that something had happened on the 21st, but not the details. I did tell my Dr-managers within a few weeks that I'd received a DUI.

At this time and for years prior, I had not been self-aware enough to admit to myself that my drinking was abnormal and that I was an alcoholic. I'd become increasingly isolated, living alone and avoiding friends as it would interfere with my drinking. Unfortunately, the DUI was not enough of a wake-up call. In the process of the legal/DMV consequences of the DUI, I did agree to go to a treatment at a 30-day alcohol/drug rehabilitation facility on the advice of my lawyer. I valued that experience, but upon returning home I returned to drinking. I knew that I had gained something through the treatment program as despite my drink, I started going to local AA meetings and was abstinent for the last 5

months of 2018. But by the time I received the big manilla envelope from the DOJ/VMB, I was back to drinking. I was completely blind-sided by the accusation and spun into fear and anxiety again. My probation started 9/25/2019, and I remember counting over and over again when I could have my last drink.

Veterinarians, and all medical professionals live in a culture of contradictions. We are highly trained and skilled doctors, but are also constantly reminded that medicine is not an exact science; there will be uncertainties and no guarantees of positive outcomes. On the other hand, quick and confident decision making is expected and poor outcomes are unacceptable. It is not a culture that is supportive of human weakness and fallibility. By the late 1990s, I was experiencing chronic anxiety, fear and depression as I tried to live with these expectations. Alcohol was a way to mute these feelings. This is a dysfunctional coping method that I have since learned unfortunately affects countless medical professionals. At the time, however, I lacked the awareness or tools necessary to address my feelings. What started as a daily habit of post-work drinking became a much more serious problem.

In addition to these professional stresses, I experienced a great personal loss. In Dec 2007 my partner Ed was injured in a bicycling accident, sustaining a catastrophic injury. He suffered a mid-cervical spinal injury and became quadriplegic. He could breathe without assistance, but lost all use of his lower arms, hands and fingers. After returning from 3 months in the hospital, he required constant in-home care. We hired help during the day and initially I tried to cover the nights, but I was still working 3-4 days a week at that time and it was too much. Eventually we had to hire 24/7 professional in-home care. Ed lived for another 4 ½ years, dying in 2012. I had four years of pre-grieving the loss of a companion and a lifestyle of travelling, cycling and dining out. Losing him and the daily activities around the house left a huge hole that I filled with alcohol. I hate to reference Ed's tragic situation as a part of my addiction history; however, I do think it contributed to depression and accelerated my drinking to an alcoholic level.

My true path towards recovery began when I started probation in September 2019. Between the time I received the accusation from the DOJ in April 2019 and starting probation, I tried to control my drinking on my own. I did not return to AA or ask anyone for help during this time. Efforts at controlled drinking (not drinking on work-nights, limiting the number of drinks) were a failure. Recognizing that I could not control my drinking and the tolerance to alcohol I had developed, I had unknowingly taken the first of the 12 Steps by acknowledging I was powerless over alcohol. The Board did not prescribe specific recovery activities, so with the help of a counselor, I wrote my own "Treatment Plan" that was accepted by the Board. It was a combination of personal and group counselling, attending AA meetings/getting a sponsor and informal monitoring by my work colleagues. At a later date, I decided put in place formal workplace monitors to give myself an additional layer of accountability.

Another large part of my ongoing recovery plan is working with Pacific Assistance Group (PAG). If you are unfamiliar with this group, I have enclosed a flyer and my most recent contract with them. I joined PAG voluntarily, agreeing to their more rigid requirements, again as an additional layer of accountability. Many of PAG's facilitators came from jobs at the California Medical Board, before the CMB ended its in-house Diversion program. Slowly, by working with my AA sponsor and the PAG counselors, I gained the acceptance and willingness to commit myself to lifelong recovery and sobriety.

Since joining PAG in fall of 2019, I've attended one 90-minute group counseling session per week; initially in-person, now on Zoom. I was soon invited to join an additional PAG group on Saturdays, also

on Zoom. I am the only veterinarian in both of these groups. Most other members are MDs or DDSs. These meetings are excellent. We talk about all areas of addiction, recovery, share probation experiences and give advice to one another. The meetings are not strict AA/NA format, so gentle "cross-talk" is allowed, and they are facilitated and supported by very experienced addiction counselors.

I do attend regular AA meetings and have worked and am continuing to work the Steps with my sponsor. This included making in-person amends (Step 9) to my colleagues for times I let them down. I currently attend a combination of in-person and on-line AA meetings, including an all DVM group through VIN. I document and report these meetings to PAG.

Daily, I read recovery materials and write in my journal. This is a quiet time first thing in the morning that I enjoy. To be my best in recovery, at work and in life in general, I take care to eat properly, get good sleep and get outdoors. Per the Board's requirement, I notified all licensed staff at my workplace that my license is on probation. To my pleasant surprise, my colleagues have become informal monitors of my behavior and demeanor at work. I also have our office manager and one of my Dr-managers submitting formal quarterly reports on me to PAG.

I have been respectful of the Boards monitoring requirements, never missing or having a questionable test, including when I've travelled within the US. I am current with all fees. As a result of these efforts and with the help of a power greater than myself, I have lost the desire to drink. I am living peacefully with much less anxiety and fear. These recovery activities have become a guide for daily living; they keep me sober both physically and emotionally. Throughout my career I have enjoyed attending Continuing Education (CE) events. In person CE came to a screeching halt due to covid so the CE certificates accompanying my petition are a combination of in person and online events.

By the time this Petition is decided upon, I will have completed close to three out of the five years of my probationary term. I will also be near 65 years of age and approaching semi- and then full retirement. There are several reasons I am petitioning the board for Early Release. Firstly, I have a strong ongoing recovery program, centered on AA, PAG and the personal introspection I have done over the last two plus years. In fact, it is my intention to remain with PAG post-probation as PAG has an 85% success record with graduates that participate for 5 years. On a more practical level, I would like the freedom to travel internationally. VMB monitoring does not allow for this. PAG has additional methods of monitoring that allow for more relaxed and free travel options. Once of retirement age, I would like to work less than the Board's hours worked per week requirement. And when I do fully retire, I would like to do so with my license intact.

Additionally, I've had a recent change in health status that will affect my future. In late 2021, I was diagnosed with metastatic breast cancer. My prognosis is favorable for the next 2-5 years, but I will be facing multiple Dr appointments, diagnostics and treatments. I do not know yet how this will affect my job and career. With this in mind, I will be prioritizing my life differently, maximizing time with family and friends. I cannot predict how many days I might be occupied with medical treatments, in hospital or feeling ill. Trying to meet the Board's testing requirements could be challenging. Again, I would like to spend this time with my veterinary license intact. I will surely continue my recovery activities and utilize my relapse prevention tools with our without the Board's formal supervision.

Thank you all for taking the time to review this Petition. I appreciate your consideration.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and accurate.

*Suzanne Hanson* 2/28/22

Suzanne Hanson DVM



Offering the most comprehensive recovery support and monitoring program available in California

### SERVICES INCLUDE:

Consultations with Employers and Hospital Well Being Committees

Initial Assessment

Referrals for evaluations, fitness-for-duty and other assessments as needed

Coordination with intensive treatment programs

Health Professional Support Groups facilitated by the most experienced team of professionals in the state

Continuous monitoring and reporting to "Concerned Entities" as agreed

Random, unannounced and for-cause testing conducted by independent labs in a sensitive and confidential manner

Substance use/abuse & Recovery education

Advocacy and support services needed to rebuild and repair the damage resulting from substance and behavioral problems

Wellness programs, Well Being Committee and medical staff training sessions available



Scan to visit our website

## PACIFIC ASSISTANCE GROUP

### NORTHERN CALIFORNIA

#### CONTACT

FRANCINE FARRELL, LMFT, CA00611

2938 Watt Ave - Suite C300  
Sacramento, CA 95821  
(916) 480-1277

### SOUTHERN CALIFORNIA

#### CONTACT

TRACY W. ZEMANSKY, PHD

8750 Camino del Rio West, Suite 201  
San Diego, CA 92108  
(619) 664-1454

### SERVICE LOCATIONS

CHICO  
CRESCENT CITY  
EUREKA  
FRESNO  
LOS ANGELES  
NEWPORT BEACH  
OAKLAND  
REDWOOD CITY  
SACRAMENTO  
SAN BERNARDINO/RIVERSIDE  
SAN DIEGO  
SAN JOSE  
SANTA BARBARA  
SANTA ROSA  
SHERMAN OAKS  
STOCKTON



## PACIFIC ASSISTANCE GROUP

A PROVEN PATH TO RECOVERY  
FOR PROFESSIONALS



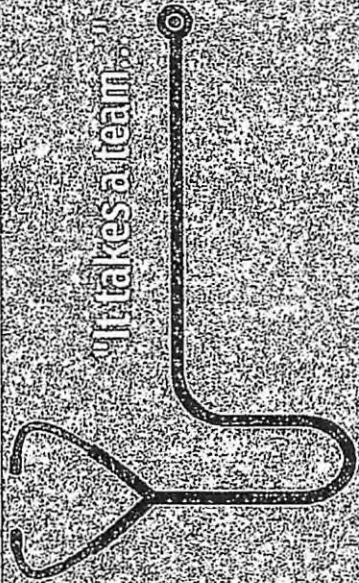
Providing Guidance, Support  
and Monitoring

Over 15 Locations Throughout California

www.pacificassistancegroup.net

Extr. 4, p. 020





### It takes a team to treat a patient.

Especially when the patient is a health care professional. The team we build can include work site monitors, hospital Well-Being Committees, psychiatrists, addictionologists, counselors, group facilitators, employers and other "Concerned Entities."

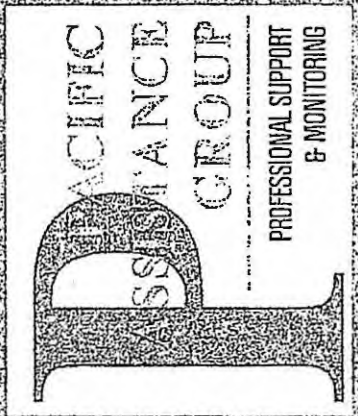
We know the road. It is not uncharted territory. Together we can set a course and monitor progress.

### Who we are...

Pacific Assistance Group is an association of highly trained and dedicated professionals, who have extensive experience treating physicians, dentists, veterinarians, pharmacists, nurses, physical therapists, physician assistants, and other professionals who have developed substance or behavioral problems.

Since the closure of the Medical Board Diversion Program, we have provided the most reliable and effective monitoring and support services throughout California. We are proud to offer confidential, individualized services to health care professionals, hospitals, employers and licensing boards.

The very best time to ask for help -- or to offer help -- is BEFORE a serious crisis mandates Board involvement. If you are concerned about yourself or a colleague, please call us today!



### When the doctor needs help STATE.

The doctor needs care. That's where we come in. We can help the employer, hospital and the physician develop a solid, workable plan. From initial assessment to return to work, we are there every step of the way. We provide guidance and support, then monitor progress carefully. With the physician's consent, we assist the employer or hospital in verifying recovery activities and abstinence from alcohol and other drugs. Significant change is possible when we work together.

Research shows a 75-85% success rate at 5 years when a physician participates in this type of comprehensive program.



# **EXHIBIT C**

FRANCINE FARRELL & ASSOCIATES, PC  
A PROFESSIONAL FAMILY THERAPY CORPORATION - DBA  
**PACIFIC ASSISTANCE GROUP - NORTHERN CALIFORNIA**  
FRANCINE FARRELL, MS, LMFT, ICADC • AREA ADMINISTRATOR

March 28, 2022

CONFIDENTIAL

Veterinary Medical Board  
Attention: Discipline Coordination Unit

c/o Amit Singh, Esq.  
765 University Avenue  
Sacramento, CA 95825

Via email to: [asingh@rwslaw.com](mailto:asingh@rwslaw.com)

RE: Letter of Recommendation for - **Suzanne Kay Hanson, DVM**  
**Case No. 4602018000478**  
**License No. 9593**

To Veterinary Medical Board, Discipline Coordination Unit,

I am a Licensed Marriage and Family Therapist and a Certified Alcohol and Drug Counselor, as well as the Area Administrator for **Pacific Assistance Group** North monitoring and support program. As such, I have been involved in assisting veterinarians and other health care professionals who have become potentially impaired due to substance use disorders and other mental health diagnoses for more than 30 years.

Suzanne Hanson, DVM, referenced above, enrolled in the **Pacific Assistance Group** Program for monitoring and support effective November 20, 2019. At that time, she was ordered by the Veterinary Medical Board to "enroll in a rehabilitation program for alcohol or drug." She chose Pacific Assistance Group as her program and was, at first, somewhat uncertain what benefit it might have beyond compliance with the probation order. I have been actively involved in supporting and monitoring her participation throughout this time.

Dr. Hanson began to attend the Health Professionals Support Group in Chico, CA and was soon introduced to other professionals in recovery and to the 12-Step programs. Previous resistance turned into a deepening gratitude and acceptance of a new, sober values system and way of life. The benefits of sobriety and of the recovery program she

3838 WATT AVE., SUITE C300 • SACRAMENTO, CA • 95821-2664  
PHONE: 916 971-1159 • FAX: 888 300-1159  
[www.pacificassistancegroup.net](http://www.pacificassistancegroup.net)

has built can only be described as transformational. I believe Dr. Hanson would now describe herself as “a grateful alcoholic.”

Dr. Hanson’s current signed agreement requires:

1. Agreement for the period November 20, 2019, through September 25, 2024 (or as needed to coincide with terms of probation)
2. Random Urine Testing – daily call-in, randomized, observed tests
  - a. Conducted by the Veterinary Medical Board
3. Regular attendance at the Health Professional Support Group (she is routinely attending group in Chico and in Sacramento virtually)
4. Regular participation in recovery activities, including healthy lifestyle and family activities

Dr. Hanson has participated in the program fully and has demonstrated meticulous compliance with her PAG program requirements. She has also demonstrated lasting and meaningful changes in attitude and behavior consistent with ongoing abstinence and working a program of recovery.

COVID-19 caused the weekly support group to become a virtual group in March of 2020. Dr. Hanson has voluntarily attended more frequent health professional support groups, including virtual support groups facilitated by her case manager, Ann Leber. I have also had direct interaction with Dr. Hanson and with her case manager regularly in the administrative role I have played in overseeing her program of recovery. Ms. Leber reports she has routinely seen Dr. Hanson interact with peers in group in a very positive and recovery-oriented manner. Suzanne is a very valued member of the support group. Her introversion has yielded to more openness and a deep connection with peers in recovery.

Dr. Hanson has embraced sobriety. She values her recovery. She is grateful for the new life that sobriety has brought her. We have seen a dramatic changes in her functioning, thinking and behaviors. She demonstrates strong recovery and offers much to newcomers, sharing her “experience, strength and hope.” Her willingness to be open, honest and transparent with herself and others serves as an example to her peers in the program. She is clearly respected and appreciated by fellow group members.

As you know, she has participated in random testing regularly through the Veterinary Medical Board’s program and has demonstrated no lapse in sobriety during her probation period. Based on her self-reports, knowledge of 12-Step, lifestyle activities and impromptu discussions with us at Pacific Assistance Group, it would appear to me that she does, in fact, celebrate two- and one-half years of continuous sobriety at this time.

In many ways, the troubling and demoralizing event that brought her to the attention of the Veterinary Medical Board also brought her into a new and healthier life and lifestyle. I believe Dr. Hanson's prognosis for ongoing sobriety is excellent.

In summary, I would state that Dr. Hanson has undertaken and achieved a meaningful and lasting change in her life as a result of the very painful event that originally brought her into recovery. Her steadfast compliance and acceptance have been well documented, and she has successfully maintained her commitment to sobriety even during difficult challenging periods. As you know, her current health situation could have been a trigger for someone with a weaker commitment to recovery. Instead, she deepened her resolve in living a strong recovery program.

I believe she is successfully rehabilitated and has the relapse prevention tools she needs to maintain her program. I hope the Veterinary Medical Board and the Attorney General's office will see this as worthy of acknowledgment and will move for early termination of probation.

Thank you for this opportunity to provide input and perspective from my viewpoint as the recovery monitor for this physician.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Please do not hesitate to contact me if you have any questions or concerns.

Respectfully submitted,

SIGNED ELECTRONICALLY TO EXPEDITE DELIVERY

*Francine Farrell, LMFT, ICADC*

Francine A. Farrell, MS, LMFT, ICADC

Licensed Marriage & Family Therapist (MFC24453)

Internationally Certified Alcohol & Drug Counselor (ICADC)

# **EXHIBIT D**





The Veterinary Medical Board of California

03/04/2022

To Whom It May Concern,

My name is Daniel Gebhart, and I have worked at VCA Valley Oak since 2012, I am part owner and co medical director since 2015. I am a member of the Northern California Veterinary Medical Association. I have personally known Dr. Suzanne Hanson since 2012, and have worked with her during this time. My father Richard Gebhart also personally worked with Dr. Hanson and bought her practice and merge it into Mangrove Veterinary Hospital over 15 years ago. Suzanne has been a loyal, caring, compassionate and knowledgeable veterinary throughout all these years. Suzanne has had multiple obstacles in her life that lead her into this situation of alcoholism and associated events. Events such as being a caretaker for her partner Ed McLaughlin who suffered a horrible bicycle accident in 2007 that left him paralyzed from the neck down and also his passing in 2012. Maybe these events perpetuated Dr. Hanson's drinking problem and contributed to her DUI or maybe not. She was also diagnosed with breast cancer a couple years ago which she has also been fighting. Before becoming sober Dr. Hanson was still a good employee but would often leave the hospital a little early from her shift, would call off occasionally, and was not the best team player always.

After her DUI, Dr. Hanson has been an exemplary employee here at VCA Valley Oak. She apologized in front of her colleagues about being an alcoholic and what she was dealing with in her personal life. She discussed that she was disappointed in herself but most importantly she felt like she let her colleagues down at our hospital. This statement was particularly moving for me, she showed incredible courage and bravery when she discussed her circumstance with us during that doctor meeting. Suzanne has been throughout a lot over the last 10 years and the courage and bravery she presents now is remarkable.

I am very proud of Dr. Hanson over the last few years. She is a great employee who works very hard, she is also very compassionate and is a skilled and knowledgeable general surgeon. Suzanne's mood and attitude have been excellent for the last couple years. She is a great team player and is always willing to help others. She is always continuing to learn more and further her veterinary skills. I greatly appreciate her company and consider a great friend and colleague. Suzanne is always punctual and comes into work with a great attitude

Suzanne is very professional with clients, staff and her fellow colleagues. She is easy to talk to and very helpful along with having a great and witty sense of humor. She is very helpful with our community, volunteering her time at our local shelter (Butte Humane Society and Chico Animal Shelter) spaying and neutering patients for the City of Chico. She donates her time and helps out at the shelter weekly spaying and neutering patients. Suzanne is well received in the veterinary community in Chico California and has been for many years. She dedicated herself to helping out many burned patients



**VCA Valley Oak Veterinary Center**

during the CAMP fire in 2018 and Bear Fire in 2020 not only here at VCA Valley Oak but also at the shelter.

I believe Suzanne has shown that she has gone above and beyond during the time she has been on probation. She checks in quarterly with Dr. Portillo and myself, she attends every doctor meeting and has shown humility and honesty with her probation and the events leading up to it. She has worked hard on her sobriety, attending AA meetings weekly and going through the steps. She has been sober now for several years and it has showed in her personality, work ethic and personal life. I am very proud of Suzanne and I know the rest of her friends, colleagues are as well.

Please feel free to call me to discuss Suzanne's probation, I feel that she has done enough and has been a exemplary employee during this time.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct

Sincerely,

Daniel Gebhart, DVM

 3/04/22

Co Medical Director

VCA Valley Oak Veterinary Center

2480 Martin Luther King Jr Pkwy

Chico, CA, 95928

530-342-7387

February 14, 2022

The Veterinary Medical Board of California

To whom it may concern,

I am writing on behalf of Dr. Suzanne Hanson in support of early termination of her probation. I first met Suzanne through our employment in 2007. My partners and I purchased her very successful local practice and combined it with ours. She then joined our practice where I have had the opportunity to work with her and more importantly, I have had the opportunity to get to know her as a person. I am the medical director and partner of VCA Valley Oak Veterinary Center. I am a native to Chico and after Veterinary School, Small animal Internship and Small animal Internal Medicine residency I was fortunate enough to find an opportunity in my hometown to build an emergency, specialty and general practice.

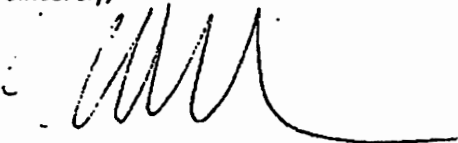
Suzanne has been a member of my team of doctors working primarily general practice and surgery and some emergency. I have worked closely with her on numerous cases. Her passion within the profession is shelter medicine with an emphasis on sterilization. She leads our practice in working with the local animal shelter and providing low cost care for their animals. She will volunteer at other animal shelters on her days off as well. Suzanne is a private person but has been a pleasure to get to know. She enjoys cycling, traveling, cooking and especially eating. She is a bit of a foodie and enjoys a good meal. Before her partner passed after a very tragic cycling accident left him a quadriplegic, they would cycle often and participated in numerous local races. While caring for her partner, she was also caring for her parents and moved them in next door. Shortly after she lost her partner, she lost her parents as well. She went through a lot of loss in a short time.

As I mentioned Suzanne is a very private person. After her accident, she sought help and we supported her in her schedule because she is a good person and a valuable member of our team. During her recovery she made a very public apology to the entire doctor team at our monthly meeting. I can only imagine how difficult that must have been and I have so much respect for her. I admire the grace and dignity she has shown during her recovery and probation. She asks for help when needed and is communicates with us regularly.

It is without reservation that I fully support early termination of Suzanne Hanson's probation. Please feel free to contact me further if you have any questions or need more information.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct.

Sincerely,



Erin Portillo, MS, DVM, DACVIM





March 11, 2022

To The Veterinary Medical Board of California:

I am writing this letter in regards to Suzanne Hanson. My name is Jeanna Thompson and I have been the Hospital Manager at VCA Valley Oak Veterinary Center since May of 2019. Prior to that I had worked in human medicine management for about ten years. In my current position I work with our two medical directors to manage this hospital which includes the doctors and support staff. Suzanne is one of the veterinarians working at my practice, Valley Oak.

In my first few weeks at this hospital, I spent time observing the doctors and staff. My first impression of Suzanne was that she was a knowledgeable but seemingly quiet doctor who was clearly skilled in her profession. Many of her associate doctors would turn to her for advice on their patients and she would happily go over the chart with them and give her opinion. I soon discovered the quiet part was the wrong impression. Once I got to know her, I found her to have a very jovial disposition, one that would include happy hellos in the morning. In the last three years, Suzanne has offered her assistance to me when I needed help with reaching out to the community doctors. I would assume that she is respected by them as they read and respond to her emails when they are sent, rather than ignoring them.

As a surgery doctor in our practice, she often does very tedious and strenuous work and still does not raise her voice or get frustrated with staff. She is well liked and respected and they are happy to help her in any situation. In addition, in my position, I am the person that handles client complaints, particularly if they pertain to my doctors. To date, I have not had a complaint about Suzanne's bedside manner or in her skills as a doctor.

Perhaps my favorite memory to date about Suzanne was in November 2020. Covid was on a rampage and we as a hospital were incredibly busy. We have a rotation for holidays so that no one has to work every holiday. However, Suzanne has always offered to work Christmas so that others can spend the time with their families. But, in November 2020, Suzanne was scheduled to be on vacation the week of Thanksgiving. Instead of going to see family, she came to the hospital and made Thanksgiving dinner for all of the staff working. This is was no small undertaking as there were about 20 people working. She didn't have to do that, but she wanted them to have a home cooked meal because it had been a hard year for everyone.



Suzanne made the doctors and myself aware of her license being placed on probation and the reasoning behind it. In a moment that understandably took a great deal of emotion for her to explain the situation, I was amazed at the amount of humility and grace in which she address the situation. And I was quite proud of the strides she explained she was making in order to right this wrong.

Please feel free to reach out if you have any further questions. I am happy to answer them.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Sincerely,

Jeanna Thompson  
15018 Humbug Road  
Magalia, Ca 95954  
909-519-4723

March 25, 2022

Attn: The Veterinary Medical Board of California

I am submitting this declaration on behalf of Suzanne Hanson's request for the early termination of her probation.

I am an attorney, a professor of Legal Studies at California State University, Chico, and a recovering alcoholic. I have been continuously sober since January 23, 1997.

I met Suzanne at an Alcoholics Anonymous meeting in Chico. I don't recall the date, but it was prior to the COVID-19 pandemic that shut down our in-person meetings for a period of time. I believe it was at the beginning of 2020. She indicated she was seeking a sponsor, a person with whom she could work through the 12 steps of AA. I agreed to take on that role for her, a process I have done with numerous women in the time I have been a member of AA.

We have worked together continuously for the past two years. I have a record of receiving e-mailed step work from her as early as March, 2020, and I know that we had a few meetings together in person prior to shifting to primarily "virtual" and telephone meetings during the early portion of the pandemic shutdown. We also met to take socially distanced walks on several occasions, in order to allow her the benefit of in-person checking in, during a time that was challenging for all newly sober people. She remained in regular contact with me by phone in between our meetings.

In the time I have worked with Suzanne, I have found her to be very honest and forthcoming in our conversations, despite her obvious shyness in meetings and reticence to speak in front of groups. She has been candid about her fears and concerns, places where she did not understand or relate to our AA literature, and her anxiety about reaching out to other alcoholics (an important part of cultivating a support network). Despite all of her fears, she has steadfastly done the work of the 12 steps, acknowledging her alcoholism, seeking a connection with a "power greater than herself," forming a network with other recovering people (in particular, she has gone to great lengths to connect with medical professionals in recovery, who share some of the same challenges she is dealing with), and making amends to people she harmed in the course of her drinking. She has consistently pushed herself to follow my suggestions (for example, making outreach calls to other alcoholics in the program), even when they made her feel uncomfortable or awkward.

In the course of our working together, I have observed her to become less guarded, less defensive, and more willing over time. She has notably shifted from doing recovery out of an obligation to the legal system or her profession, into pursuing recovery because it brings relief, freedom from anxiety, and peace of mind. While no one has the ability to predict with perfect accuracy who will "make it" and experience a life of permanent sobriety (I continue to characterize my own 25-year sobriety as one day at a time), from everything I have observed

about Suzanne's work in our program, she is extremely likely to continue working the program, and to remain sober, after her probation has ended. Her motivation has shifted from an externally-driven desire to stay out of "trouble" into an internal drive to experience the benefits of sobriety.

This became very clear when she received her cancer diagnosis and we had some real heart to hearts about what that meant. In the course of our conversations, she revealed that she has a strong desire to stay sober, no matter what, and that she understands that nothing life throws at her will be improved in any way by taking a drink. I am confident that she will remain sober, law-abiding, and continue to be a productive member of society upon the termination of her probation.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.



Maitreya Badami

mbadami@csuchico.edu



**The Veterinary Medical Board of California**

**Letter of Support for Suzanne K. Hanson, DVM.**

To Whom It May Concern:

I am writing in support of **Suzanne K. Hanson, DVM**, who is applying to the Veterinary Medical Board of California for **early termination of probation**.

I met Suzanne Hanson shortly after I arrived in Chico in 1990. She then worked at a local veterinary practice and I saw her whenever my pet needed attention. Her intelligence, competence, and good sense were manifest in her professional demeanor and "catside" manner. She provided compassionate and sensible care to my animals and welcomed both my opinions and queries. I've encountered many veterinarians as I've moved around the US (Maryland, Virginia, Minnesota, Ohio, Nebraska, and California) for work. Given those experiences, I can say with confidence that Dr. Hanson is among the best I've ever known.


Much to my surprise and delight, I came across Dr. Hanson in a non-professional setting in 1993 when I began to attend the church she belonged to in Chico CA. We developed an ongoing relationship that came to include our respective families and work colleagues. Suzanne has proven herself over the years to be a kind and caring friend who can be relied upon for help and support. Her generosity extends beyond her circle of friends and out into the wider community. Her ongoing engagement in the care and treatment of Butte County's animal population through the SPCA and Chico Animal Shelter exemplifies her desire to be of service.

Since 2007, Dr. Hanson has faced a series of significant personal challenges. Her life partner suffered a catastrophic injury that year which destroyed what had been a life full of travel and shared interests. Ed's near total debilitation meant that Suzanne had to assume complete responsibility for their household, his care, and still go to work. While their friends and family did what we could to lighten the load, it still fell to Suzanne to manage his complicated care regimens and schedules. Until Ed's death in 2012, she was constantly dealing with physical, emotional, and spiritual exhaustion. And yet she persevered, serving her clients and colleagues while dealing with this horrendous personal tragedy.

More recently, Dr. Hanson has experienced even more hardships. She was diagnosed with breast cancer in late 2017 and had surgery and radiation treatments (both successful) in early 2018. Nearly simultaneously, Suzanne was also dealing with the personal and professional fall-out arising from her DUI in late 2017. While her road to sobriety has had some setbacks, she has been sober since late 2019. Suzanne's shared information with me about her ongoing recovery efforts that include AA, a substance monitoring program, and personal counseling. She is scrupulous about working her program, seeking support from her sponsor, and doing what she can to bring balance and joy into her daily life. As her friend, I am so very proud of the tenacity, humility, and courage she continues to demonstrate while continuing the hard work necessary to sustain her sobriety.

**In conclusion, I strongly support Suzanne Hanson's application for early termination of probation. Please feel free to contact me if I can offer any additional information that could prove useful to your evaluation. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.**

Sincerely,

  
Lisa E. Emmerich

**Emerita Professor of History and Coordinator, American Indian Studies Program  
California State University, Chico**

**2352 Bloomington Avenue, Chico CA 95928 530-894-5904**

LARRY COLLINS, M.A.  
LICENSED MARRIAGE AND FAMILY THERAPIST  
CERTIFIED ALCOHOL AND DRUG COUNSELOR, *Inactive*  
SUBSTANCE ABUSE PROFESSIONAL FOR THE FEDERAL DEPARTMENT OF TRANSPORTATION, *Inactive*

P.O. Box 885 Paradise CA 95967  
PHONE/FAX 530.342.9456

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March 14, 2022

The Veterinary Medical Board of California

c/o Amit Singh  
765 University Avenue  
Sacramento CA. 95825

Re: Suzanne Hanson (DOB: 11-22-57)

As the Group Facilitator for the local Chico Pacific Assistance Group Program since 1997 (in prior years I was also the Group Facilitator for the California State Medical Board Diversion Program), I am writing in support of Suzanne Hanson's request for Early Release from her Probation with the Veterinary Medical Board of California.

I have worked in the recovery field for 36 years, taught at both the State and Community college level in the areas of psychology and addiction. I was employed for a time by the California State Medical Board Diversion Program as a Case Manager, and have served in various capacities for Pacific Assistance Group.

According to my records I first met Suzanne for an Intake on 10-16-19 into my private practice following a referral from a local doctor, Brandan Stark, D.O., whose outpatient Substance Abuse Recovery Program she had been attending, after completing a residential treatment episode at Duffy's in California. She had been cited with a DUI 2 years prior after which she continued with AA meetings, but without sponsorship. She stated to me she had continued her new sobriety from June to December that same year but resumed "moderate" use of alcohol, first cooking with wine, then resuming drinking several days weekly. She had also stated at the Intake her last use of alcohol had been on approximately 09-20-19. Suzanne's history of alcohol use went as far back as the 1980s, but seems to be without incident

There were many events Suzanne experienced around this time, including a cancer diagnosis and surgery, the closing of her private veterinary practice and taking position at Valley Oak Veterinary Center in Chico, California. She also had experienced some depression and sleep issues for which she had been being treated. Of note, some years later in 2007 her significant other was severely injured in an auto accident and later deceased in 2012.



LARRY COLLINS, M.A.

LICENSED MARRIAGE AND FAMILY THERAPIST

CERTIFIED ALCOHOL AND DRUG COUNSELOR, Inactive

SUBSTANCE ABUSE PROFESSIONAL FOR THE FEDERAL DEPARTMENT OF TRANSPORTATION, Inactive

P.O. Box 885 Paradise CA 95967

PHONE/FAX 530.342.9456

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By the Fall of 2019 the Board had determined the Decision and Order for her case and by January of 2020 she had connected with Pacific Assistance Group in order to outline a program of monitoring which included weekly, in-person group in Chico for support and monitoring. Her program included in addition both weekly group meeting, random UA testing, and some individual therapy as needed.

Suzanne continued to see her primary care physician for depression and sleep issues, and began to employ some self-care components of daily walks, attended AA meetings, and explored what a "non-drunk Suzanne" was like. Suzanne came to recognize her tendency to isolate, presented as quite shy and quiet, and was anxious about sharing her story in the AA meetings. In her individual therapy she addressed these issues along with her family of origin experience of growing up in an alcoholic home. She began to seek out a support/therapy group for this.

Over her time in the PAG program, along with her AA meetings, her recovery included additional support groups through PAG; reading recovery materials; she began to explore her isolation tendencies, and began to find she had some motivation for changes. Some of these changes have including taking the risk of sharing in the PAG groups, opening up and revealing her thoughts and feelings and needs. Suzanne began to create a plan of self-care, establish new goals regarding self-image and self-confidence, and develop and maintain healthy personal boundaries. An early issue for many folks in recovery is regarding how to enjoy oneself, have fun, and relax. Suzanne loves to read, watch golf tournaments on TV, and enjoy relaxing evenings with her cat family.

It has been a pleasure to see Suzanne establish herself in her new clean and sober lifestyle. She seems to enjoy her work at the veterinarian clinic and evidently gets along well with other staff and is able to support others as they work toward common goals for their animal patients. It is my understanding that she has made efforts to connect more closely with her siblings over the past couple of years, and although still somewhat quiet and reserved, there has been a significant blossoming as we have seen the recovery lifestyle provide her with its rewards and benefits.

For most professionals in recovery, the experience of a monitoring program is often frightening and intimidating, overwhelming and seemingly impossible to maintain compliance. Initially it can be very confusing. Overall it can be very expensive. Attempting to keep a normal work schedule, attend the required monitoring and recovery meetings, and have somewhat of a normal social and/or family life, can be extremely challenging. There were times when Suzanne felt she may not be able to do it. Her perseverance and dedication to this new lifestyle eventually became reinforcing in itself. She found her way, kept steady and maintained the course. She remains on this journey.



LARRY COLLINS, M.A.

LICENSED MARRIAGE AND FAMILY THERAPIST  
CERTIFIED ALCOHOL AND DRUG COUNSELOR, *Inactive*  
SUBSTANCE ABUSE PROFESSIONAL FOR THE FEDERAL DEPARTMENT OF TRANSPORTATION, *Inactive*

P.O. Box 885 Paradise CA 95967

PHONE/FAX 530.342.9456

---

Thank you for attention and assistance to Suzanne Hanson. I am happy to provide further information as needed.

I declare under penalty of perjury under the laws of the State of California the the foregoing is true and correct.

A handwritten signature in black ink, appearing to read "Larry Collins". The signature is written in a cursive style with a large initial "L".

Larry Collins, MFT

# **EXHIBIT E**

## RELAPSE PREVENTION PLAN

Suzanne Hanson

Included in my Petition for Early Release from Probation and personally relevant to anyone in recovery, including myself, is a Relapse Prevention Plan. It is my long-term goal and daily intention to remain sober, striving to provide my clients and patients with the best, most thoughtful care possible, and to continue my personal journey of recovery and discovery. Items in my plan are persons, places and things that support me personally and especially my recovery.

1. To continue as a member of Pacific Assistance Group (PAG) during my remaining working years. PAG has an 85% long term recovery rate when clients complete a 5-year program. This contract will include weekly group meetings and random drug/alcohol testing, but with the flexibility to travel.
2. Regular AA meetings, talking and meeting with my sponsor, continuing to work on the 12 steps, taking time daily for reading and journaling related to my recovery program. This work has helped me find strength not ordinarily my own, and to find peace of mind in the face of difficult circumstances. There is an "All DVM" AA meeting once a week through VIN. This group is very helpful; it is a safe, comfortable and anonymous group where we can share work related issues that would not be appropriate for a "regular" AA meeting.
3. The support of my co-workers. They provide many sets of eyes to monitor my work activities. As the letters from my Dr/managers attest, since settling into Probation and recovery, I have been a more attentive doctor and a happier person overall.
4. Ongoing Continuing Education meetings. I enjoy these events and they help to keep me current with our rapidly changing profession.
5. Managing Stress. Over the last 2 years I have asked to have my work schedule changed. I now mainly do surgery and procedures and have less client contact. I'm a bit more in control of my daily workflow.
6. The support of my family. My brother and sister are aware of the DUI, that I no longer drink and that I regularly attend PAG and AA groups. They have been very compassionate and supportive over the last 4 years.
7. Taking care of myself. This means getting enough sleep, eating well, getting outdoors, reading recovery material and for pleasure, maintaining a healthy work-life balance. To me it also means paying attention to the people, places and things that are not healthy for us, things that could trigger a relapse. When negative situations are encountered, I'm learning to recognize and accept them for what they are, letting them pass and not using them as a reason to look for solace in a glass.

Hopefully, these elements will serve me well as I move forward in my career and my life.

  
Suzanne Hanson, DVM *Chico, CA* 1/3/22

# **EXHIBIT F**



March 16, 2018

To Whom It May Concern:

RE: Suzanne Hanson

This letter is to verify that Suzanne Hanson was a guest at this facility from 02/14/18 to 03/16/18. She successfully completed Duffy's Napa Valley's Foundational program.

While here, Suzanne actively participated in a recognized, licensed program of recovery for alcoholism and/or addiction. Our program introduces, models, and motivates for the 12-step program philosophy and participation, which can inspire the change of attitude, outlook and behavior that is necessary for maintaining continued abstinence. Suzanne received education about the bio-psycho-social aspects of addiction, and the affect it has on families. She attended group and individual therapy sessions twice weekly to identify and address personal issues. Peer group exchanges of hopes, fears and strengths provide effective support, and relapse-prevention skills are woven throughout the program.

Duffy's clinical staff are experienced, educated, and certified in chemical dependency treatment. They provide assessments, treatment plans, counseling, referrals, and discharge planning. Participation in twelve-step and other recovery support groups, attending meetings regularly, working with a sponsor, and intensive outpatient program participation are recommended for Suzanne.

Sincerely,

A handwritten signature in black ink, appearing to read "Lia Willendrup". The signature is fluid and cursive, written over a faint, dotted background.

Lia Willendrup, BA, CATC  
Treatment Support Team Manager

# **EXHIBIT G**

Suzanne Hanson #9593

4602018000487

**Continuing Education 9/1/2019 to present**

10/27/2019 UC Davis Fall Festival	8 units
10/2/2019 North Valley VMA	1 unit
11/16-17/2019 UC Davis	10 units
2/19/2020 USDA	1 unit
2/22-23/2020 UC Davis	11 units
6/25/2020 Boehringer-Ingelheim	2 units
7/16/2020 Boehringer-Ingelheim	2 units
9/27/2020 UC Davis	8 units
12/12/2020 UC Davis	3 units
2/20/2021 UC Davis	12 units
3/10/2021 UC Davis	2 units
4/28/2021 UC Davis	2 units
7/17/2021 UC Davis	7 units
8/19/2021 Zoetis	1 unit

*Suzanne Hanson 2-11-22*

UNIVERSITY OF CALIFORNIA, DAVIS

8

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SANTA BARBARA • SANTA CRUZ

SCHOOL OF VETERINARY MEDICINE  
CENTER FOR CONTINUING PROFESSIONAL EDUCATION  
ONE SHIELDS AVENUE  
DAVIS, CA 95616  
Tel (530) 752-3905  
<http://www.vetmed.ucdavis.edu/CE/>

THIS IS TO CERTIFY THAT

Suzanne Hanson

(ATTENDEE)

ATTENDED THE  
**2019 FALL FESTIVAL CONTINUING EDUCATION EVENT**  
ON **OCTOBER 27, 2019**  
AT GLADYS VALLEY HALL,  
UC DAVIS SCHOOL OF VETERINARY MEDICINE

THIS PROGRAM HAS BEEN REVIEWED AND ASSIGNED UP TO 8 HOURS OF  
SCIENTIFIC CONTINUING EDUCATION CREDIT BY THE  
SCHOOL OF VETERINARY MEDICINE.

Jodi Westropp

JODI L. WESTROPP, DVM, PhD, DACVIM  
DIRECTOR, CENTER FOR CONTINUING  
PROFESSIONAL EDUCATION

**PLEASE NOTE:**  
VETERINARY MEDICAL ETHICS AND STATE LICENSING AUTHORITIES  
REQUIRE YOU TO ONLY CLAIM THE HOURS YOU ACTUALLY ATTENDED

NUMBER OF HOURS ACTUALLY ATTENDED 8



VCA VALLEY OAK VETERINARY CENTER  
**Continuing Education**  
Certificate of Achievement

*This is to certify that*

*Suzanne Hanson*  
\_\_\_\_\_

*has successfully completed 1 hour of CE*

**Slow the Roll of Cortisol: Managing Hyperadrenocorticism**

Erin Portillo, DVM, MS, DACVIM (SAIM)

October 2, 2019

The above program was approved by the North Valley Veterinary Medical Association to offer 1 CE Credit



*Erin Portillo*  
\_\_\_\_\_  
Erin Portillo, DVM, MS, DACVIM (SAIM)  
Medical Director, VCA Valley Oak Veterinary Center



UNIVERSITY OF CALIFORNIA, DAVIS

10

BERKELEY • DAVIS • IRVINE • LOS ANGELES • MERCED • RIVERSIDE • SAN DIEGO • SAN FRANCISCO



SANTA BARBARA • SANTA CRUZ

SCHOOL OF VETERINARY MEDICINE  
CENTER FOR CONTINUING PROFESSIONAL EDUCATION  
ONE SHIELDS AVENUE  
DAVIS, CA 95616  
Tel (530) 752-3905  
<http://www.vetmed.ucdavis.edu/CE/>

THIS IS TO CERTIFY THAT

**Suzanne Hanson**

(ATTENDEE)

ATTENDED THE  
2019 WINN FELINE FOUNDATION  
FIP SYMPOSIUM  
ON NOVEMBER 16-17, 2019  
AT GLADYS VALLEY HALL  
UC DAVIS SCHOOL OF VETERINARY MEDICINE

THIS PROGRAM HAS BEEN REVIEWED AND ASSIGNED UP TO 10 HOURS OF  
SCIENTIFIC CONTINUING EDUCATION CREDIT BY THE  
SCHOOL OF VETERINARY MEDICINE.

JODI L. WESTROPP, DVM, PhD, DACVIM  
DIRECTOR, CENTER FOR CONTINUING  
PROFESSIONAL EDUCATION

PLEASE NOTE:  
VETERINARY MEDICAL ETHICS AND STATE LICENSING AUTHORITIES  
REQUIRE YOU TO ONLY CLAIM THE HOURS YOU ACTUALLY ATTENDED

NUMBER OF HOURS ACTUALLY ATTENDED 10

# USDA-APHIS NATIONAL VETERINARY ACCREDITATION PROGRAM SUPPLEMENTAL TRAINING MODULE COMPLETION CERTIFICATE

## Module 23: Use of Antibiotics in A

Content Finalized: February 2017, Revised October 2017

The content in this module has been approved expressly to serve as one unit of supplemental training for the National Veterinary Accreditation Program. Please ensure you retain, (save the file or print) this certificate. If you have completed this module and will need to be provided to the appropriate official should APHIS audit you in the future. Contact your NVAP Coordinator for more details on accreditation renewal.

Save for 2021  
UMB  
Antibiotic Stewardship

Suzanne Hanson

First Name

Last Name

22 Riverwood Loop

Street Address, Apt. #

Chico CA 95926

City, State, ZIP Code

016681

National Accreditation Number (NAN)

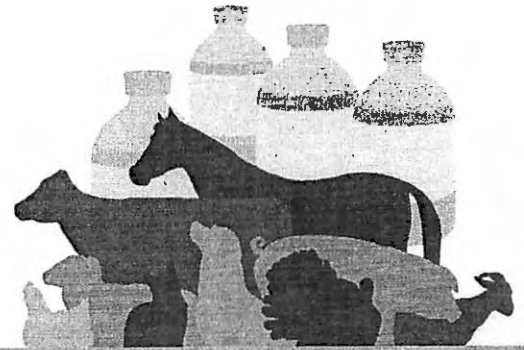
I have read the contents of this web-based supplemental training module

Suzanne Hanson  
Signature

2/19/20  
Date of Completion

Indicate the format of the supplemental materials reviewed

Web-based



16 11



SCHOOL OF VETERINARY MEDICINE  
CENTER FOR CONTINUING PROFESSIONAL EDUCATION  
ONE SHIELDS AVENUE  
DAVIS, CA 95616  
Tel (530) 752- 3905  
<http://www.vctmed.ucdavis.edu/CE/>

THIS IS TO CERTIFY THAT

**Suzanne Hanson**

(ATTENDEE)

ATTENDED THE  
**WINTER CONFERENCE**  
**ON FEBRUARY 22-23, 2020**  
AT GLADYS VALLEY HALL,  
UC DAVIS SCHOOL OF VETERINARY MEDICINE

THIS PROGRAM HAS BEEN REVIEWED AND ASSIGNED UP TO 16 HOURS OF  
CONTINUING EDUCATION CREDIT BY THE  
SCHOOL OF VETERINARY MEDICINE.

JODI L. WESTROPP, DVM, PhD, DACVIM  
DIRECTOR, CENTER FOR CONTINUING  
PROFESSIONAL EDUCATION

PLEASE NOTE:  
VETERINARY MEDICAL ETHICS AND STATE LICENSING AUTHORITIES  
REQUIRE YOU TO ONLY CLAIM THE HOURS YOU ACTUALLY ATTENDED

NUMBER OF HOURS ACTUALLY ATTENDED

11 hours

2

# CERTIFICATE

## Continuing Education Course Completion



Boehringer Ingelheim proudly presents this certificate to

Suzanne Hanson

for successfully completing the Continuing Education course

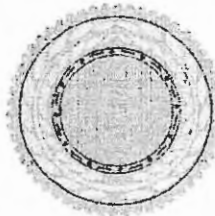
*Update on Vector-Borne Diseases presented by Jane Sykes BVSc, PhD*

9593

license no.

CA

state



June 25, 2020

date

Suzanne Hanson  
signature

Lecture qualifies for 2.0 hours of CE credit in accordance with the Continuing Education Policy of the State Education Department/The University of the State of New York as granted on April 16, 2018.  
Learning activity format: live webinar presentation.


This program 412-41489 is approved by the AAVSB RACE to offer a total of 2.0 CE Credits (2.0 max) being available to any one veterinarian; and/or Veterinary Technician CE Credits (2.0 max). This RACE approval is for the subject matter category of: Medical using the delivery method of: Seminar/Lecture. This approval is valid in jurisdictions which recognize AAVSB RACE; however, participants are responsible for ascertaining each board's CE requirements. RACE does not "accredit" or "endorse" or "certify" any program or person, nor does RACE approval validate the content of the program. For questions regarding your CE credits or for more information, contact [celinfo@lifelearn.com](mailto:celinfo@lifelearn.com).

Exh. 4, p. 056

2  
7

# CERTIFICATE

## Continuing Education Course Completion

 **Boehringer Ingelheim** proudly presents this certificate to

*Suzanne Hanson*

for successfully completing the Continuing Education course

*Managing Mitral Valve Disease 2019 ACVIM Consensus Recommendations presented by Clarke Atkins DVM, DACVIM*

9593

license no.

CA

state



July 16, 2020

date

*Suzanne Hanson*  
signature

Lecture qualifies for 2.0 hours of CE credit in accordance with the Continuing Education Policy of the State Education Department/The University of the State of New York as granted on April 16, 2018.  
Learning activity format: live webinar presentation.

This program 412-38722 is approved by the AAVSB RACE to offer a total of 2.0 CE Credits (2.0 max) being available to any one veterinarian; and/or Veterinary Technician CE Credits (2.0 max). This RACE approval is for the subject matter category of: Medical using the delivery method of: Seminar/Lecture. This approval is valid in jurisdictions which recognize AAVSB RACE; however, participants are responsible for ascertaining such board's CE requirements. RACE does not "accredit" or "endorse" or "certify" any program or person, nor does RACE approval validate the content of the program. For questions regarding your CE credit or for more information, contact [ceinfo@hjel.com](mailto:ceinfo@hjel.com).

Exh. 4, p. 057



**UC DAVIS**  
**VETERINARY MEDICINE**

*Center for Continuing Professional Education*

SCHOOL OF VETERINARY MEDICINE  
 CENTER FOR CONTINUING PROFESSIONAL EDUCATION  
 ONE SHIELDS AVENUE  
 DAVIS, CA 95616  
 Tel (530) 752-3905  
<http://www.vetmed.ucdavis.edu/CE>

THIS IS TO CERTIFY THAT

**Suzanne Hanson**

*(ATTENDEE)*

ATTENDED THE  
**2020 FALL SYMPOSIUM CONTINUING EDUCATION EVENT**  
 ON **SEPTEMBER 27, 2020**

THIS PROGRAM HAS BEEN REVIEWED AND ASSIGNED UP TO 8 HOURS OF  
 SCIENTIFIC CONTINUING EDUCATION CREDIT BY THE  
 SCHOOL OF VETERINARY MEDICINE.

JODI L. WESTROPP, DVM, PhD, DACVIM  
 DIRECTOR, CENTER FOR CONTINUING PROFESSIONAL EDUCATION

**PLEASE NOTE:**  
 VETERINARY MEDICAL ETHICS AND STATE LICENSING AUTHORITIES  
 REQUIRE YOU TO ONLY CLAIM THE HOURS YOU ACTUALLY ATTENDED

NUMBER OF HOURS ACTUALLY ATTENDED

*8* *9-28-20*

EXN. 4, p. 058



Center for Continuing Professional Education

SCHOOL OF VETERINARY MEDICINE  
CENTER FOR CONTINUING PROFESSIONAL EDUCATION  
ONE SHIELDS AVENUE  
DAVIS, CA 95616  
Tel (530) 752-3905  
<http://www.vetmed.ucdavis.edu/CE>

3

THIS IS TO CERTIFY THAT

**Suzanne Hanson**

*(ATTENDEE)*

ATTENDED THE  
**SMALL ANIMAL MEDICINE MINI BOOT CAMP SERIES:  
MANAGEMENT OF CORNEAL DISEASES  
ON DECEMBER 12, 2020**

THIS PROGRAM HAS BEEN REVIEWED AND ASSIGNED UP TO 3 HOURS OF  
SCIENTIFIC CONTINUING EDUCATION CREDIT BY THE  
SCHOOL OF VETERINARY MEDICINE.

JODI L. WESTROPP, DVM, PhD, DACVIM  
DIRECTOR, CENTER FOR CONTINUING PROFESSIONAL EDUCATION

**PLEASE NOTE:**  
VETERINARY MEDICAL ETHICS AND STATE LICENSING AUTHORITIES  
REQUIRE YOU TO ONLY CLAIM THE HOURS YOU ACTUALLY ATTENDED

NUMBER OF HOURS ACTUALLY ATTENDED 3

EXH. 4, p. 009





# 2021 Winter Conference

THIS IS TO CERTIFY THAT

**Suzanne Hanson**

(Attendee)

ATTENDED THE 2021 WINTER CONFERENCE ON  
FEBRUARY 20, 2021 AND FEBRUARY 21, 2021 AT THE  
UC DAVIS SCHOOL OF VETERINARY MEDICINE

This program has been reviewed and assigned up to 12 hours of scientific continuing education credit by the School of Veterinary Medicine.

*Please note: Veterinary medical ethics and state licensing authorities require you to only claim the hours you actually attended*

NUMBER OF HOURS ACTUALLY ATTENDED

12 SAH

Jodi L. Westropp, DVM, PhD, DACVIM  
Director, Center for Continuing Professional Education

3/22/2021

Small Animal Medicine Mini Boot Camp Series: Diet and DCM CE Certificate

2


From: svmcontinuinged@ucdavis.edu,  
To: [REDACTED]  
Subject: Small Animal Medicine Mini Boot Camp Series: Diet and DCM CE Certificate  
Date: Thu, Mar 18, 2021 5:03 pm

Hello Suzanne,

Thank you for participating in the Small Animal Medicine Mini Boot Camp Series: Diet and DCM. Below is your Mini Boot Camp Series: Diet and DCM CE Certificate to certify that you have received continuing education (CE) credit for this event. Please print and enter the number of hours you attended on the bottom left.

Best regards,

Center for Continuing Professional Education  
School of Veterinary Medicine, UC Davis  
530-752-3905 | svmcontinuinged@ucdavis.edu  
<https://ce.vetmed.ucdavis.edu>



**UC DAVIS**  
**VETERINARY MEDICINE**  
*Center for Continuing Professional Education*

**Small Animal Medicine  
Mini Boot Camp Series: Diet and DCM**

THIS IS TO CERTIFY THAT

Suzanne Hanson  
(Attendee)


ATTENDED THE SMALL ANIMAL MEDICINE MINI BOOT CAMP SERIES: DIET AND DCM  
ON MARCH 10, 2021 AT THE UC DAVIS SCHOOL OF VETERINARY MEDICINE

This program has been reviewed and assigned up to 2 hours of scientific continuing  
education credit by the School of Veterinary Medicine.

*Please note: Veterinary medical ethics and state licensing authorities  
require you to only claim the hours you actually attended*

NUMBER OF HOURS ACTUALLY ATTENDED 2

*SAH*




---

Jodi L. Westropp, DVM, PhD, DACVIM  
Director, Center for Continuing Professional Education

[To unsubscribe from this mailing list, please click here](#)

From: svmcontinuinged@ucdavis.edu,

To: [REDACTED]

Subject: Small Animal Medicine Mini Boot Camp Series: Antibiotic Responsive Diarrhea CE Certificate

Date: Wed, May 5, 2021 2:15 pm



UC DAVIS

VETERINARY MEDICINE

Center for Continuing Professional Education

2

### Small Animal Medicine Mini Boot Camp Series: Antibiotic Responsive Diarrhea

THIS IS TO CERTIFY THAT

Suzanne Hanson  
(Attendee)

ATTENDED THE SMALL ANIMAL MEDICINE MINI BOOTCAMP  
SERIES: ANTIBIOTIC RESPONSIVE DIARRHEA ON WEDNESDAY, APRIL 28, 2021  
AT THE UC DAVIS SCHOOL OF VETERINARY MEDICINE

This program has been reviewed and assigned up to 2 hours of scientific continuing education credit by the School of Veterinary Medicine.

*Please note: Veterinary medical ethics and state licensing authorities require you to only claim the hours you actually attended*

Jodi L. Westropp, DVM, PhD, DACVIM  
Director, Center of Continuing Professional Education

NUMBER OF HOURS ACTUALLY ATTENDED 2

Hello Suzanne,

Thank you for participating in the Small Animal Medicine Mini Boot Camp Series: Antibiotic Responsive Diarrhea. Your Mini Boot Camp Series: Antibiotic Responsive Diarrhea CE Certificate is to certify that you have received continuing education (CE) credit for this event. Please print and enter the number of hours you attended on the bottom left.

Best regards,

[/webmail-std/en-us/PrintMessage](#)

From: svmcontinuinged@ucdavis.edu,

To: [REDACTED]

Subject: Small Animal Medicine Mini Boot Camp Series: Antibiotic Responsive Diarrhea CE Certificate

Date: Wed, May 5, 2021 2:15 pm



2

**Small Animal Medicine  
Mini Boot Camp Series: Antibiotic Responsive Diarrhea**

THIS IS TO CERTIFY THAT

Suzanne Hanson  
(Attendee)

ATTENDED THE SMALL ANIMAL MEDICINE MINI BOOTCAMP  
SERIES: ANTIBIOTIC RESPONSIVE DIARRHEA ON WEDNESDAY, APRIL 28, 2021  
AT THE UC DAVIS SCHOOL OF VETERINARY MEDICINE

This program has been reviewed and assigned up to 2 hours of scientific continuing education credit by the School of Veterinary Medicine.

*Please note: Veterinary medical ethics and state licensing authorities require you to only claim the hours you actually attended*

NUMBER OF HOURS ACTUALLY ATTENDED 2

Jodi L. Westropp, DVM, PhD, DACVIM  
Director, Center of Continuing Professional Education

Hello Suzanne,

Thank you for participating in the Small Animal Medicine Mini Boot Camp Series: Antibiotic Responsive Diarrhea. Your Mini Boot Camp Series: Antibiotic Responsive Diarrhea CE Certificate is to certify that you have received continuing education (CE) credit for this event. Please print and enter the number of hours you attended on the bottom left.

Best regards,



7/19/2021

2021 Feline Symposium: Caring for the Senior Cat\_CE Certificate

3.5

From: svmcontinuinged@ucdavis.edu,

To: [REDACTED]

Subject: 2021 Feline Symposium: Caring for the Senior Cat\_CE Certificate

Date: Mon, Jul 19, 2021 11:30 am



## 2021 Feline Symposium: Caring for the Senior Cat

THIS IS TO CERTIFY THAT

Suzanne Hanson  
(Attendee)

ATTENDED THE 2021 FELINE SYMPOSIUM:  
CARING FOR THE SENIOR CAT ON SATURDAY, JULY 17, 2021  
AT THE UC DAVIS SCHOOL OF VETERINARY MEDICINE

This program has been reviewed and assigned up to 8.5 hours of scientific continuing education credit by the School of Veterinary Medicine.

*Please note: Veterinary medical ethics and state licensing authorities require you to only claim the hours you actually attended*

*Jodi Westropp*

NUMBER OF HOURS ACTUALLY ATTENDED

7.0 *S/H 7-19-21*

Jodi L. Westropp, DVM, PhD, DACVIM  
Director, Center of Continuing Professional Education

Hello Suzanne,



## CERTIFICATE OF ATTENDANCE

Suzanne Hanson

has attended a continuing education symposium

Participant Signature & Date: Suzanne Hanson 8-19-21  
Participant State(s) of Licensure: CA  
Participant License #(s): 9593  
# of CE Hours: (1 Hour)

PROGRAM TITLE: Introduction to Monoclonal Antibody Therapies – A New Therapeutic Approach in Companion Animal Medicine  
(AAVSB RACE Approval #192-38894)

DATE: August 19, 2021

LOCATION: 5th Street Steakhouse, Chico, CA

SPEAKER(S): Ron Lytle, BVSc

PRESENTED BY: Zoetis, Parsippany, NJ  
AAVSB RACE Provider #192

SUBJECT CATEGORY: Medical

METHOD OF DELIVERY: Lecture

Authorized By: Michael Hartman  
Zoetis Representative

*This program has been approved for 1 hour of continuing education credit in jurisdictions that recognize RACE approval*

From: svmcontinuinged@ucdavis.edu,

To: [REDACTED]

Subject: 2022 Winter Conference CE Certificate

Date: Mon, Mar 14, 2022 10:01 am



## 2022 Winter Conference

THIS IS TO CERTIFY THAT

Suzanne Hanson  
(Attendee)

ATTENDED THE 2022 WINTER CONFERENCE ON SATURDAY, FEBRUARY 26, 2022  
AND SUNDAY, FEBRUARY 27, 2022 AT THE UC DAVIS SCHOOL OF VETERINARY MEDICINE

This program has been reviewed and assigned up to 15 hours of scientific continuing education credit by the School of Veterinary Medicine.

*Please note: Veterinary medical ethics and state licensing authorities require you to only claim the hours you actually attended.*

NUMBER OF HOURS ACTUALLY ATTENDED

15

Jodi L. Westropp, DVM, PhD, DACVIM  
Director, Center for Continuing Professional Education

Hello Suzanne,

Thank you for participating in the 2022 Winter Conference. Your CE Certificate is to certify that you have received continuing education (CE) credit for this event. Please print and enter the number of hours you attended on the bottom left.

Best regards,

Center for Continuing Professional Education  
School of Veterinary Medicine, UC Davis  
630-752-3905 | [svmcontinuinged@ucdavis.edu](mailto:svmcontinuinged@ucdavis.edu)  
<https://ce.valmed.ucdavis.edu>

*To unsubscribe from this mailing list, please click here*

all-stolen-us/PrintMessage

Exh. 4, p. 067



From: svmcontinuinged@ucdavis.edu,

To: [REDACTED]

Subject: 2022 Winter Conference CE Certificate

Date: Mon, Mar 14, 2022 10:01 am



**UC DAVIS**  
VETERINARY MEDICINE  
Center for Continuing Professional Education

## 2022 Winter Conference

THIS IS TO CERTIFY THAT

Suzanne Hanson  
(Attendee)

ATTENDED THE 2022 WINTER CONFERENCE ON SATURDAY, FEBRUARY 26, 2022  
AND SUNDAY, FEBRUARY 27, 2022 AT THE UC DAVIS SCHOOL OF VETERINARY MEDICINE

This program has been reviewed and assigned up to 15 hours of scientific continuing  
education credit by the School of Veterinary Medicine.

*Please note: Veterinary medical ethics and state licensing authorities  
require you to only claim the hours you actually attended.*

NUMBER OF HOURS ACTUALLY ATTENDED 15

Jodi L. Westropp, DVM, PhD, DACVIM  
Director, Center for Continuing Professional Education

Hello Suzanne,

Thank you for participating in the 2022 Winter Conference. Your CE Certificate is to certify that you have received continuing education (CE) credit for this event. Please print and enter the number of hours you attended on the bottom left.

Best regards,

Center for Continuing Professional Education  
School of Veterinary Medicine, UC Davis  
530-752-3905 | [svmcontinuinged@ucdavis.edu](mailto:svmcontinuinged@ucdavis.edu)  
<https://ce.vetmed.ucdavis.edu>

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# **EXHIBIT H**

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NUMBER: 311060 NAME: Amit Singh FIRM NAME: Rothschild Wishek & Sands LLP STREET ADDRESS: 765 University Avenue CITY: Sacramento STATE: CA ZIP CODE: 95825 TELEPHONE NO.: (916) 444-9845 FAX NO.: (916) 640-0027 E-MAIL ADDRESS: asingh@rwsllaw.com ATTORNEY FOR (name): Suzanne Hanson		FOR COURT USE ONLY <b>Endorsed FILED</b> JAN 14 2022 SUPERIOR COURT OF CALIFORNIA COUNTY OF SUTTER CLERK OF THE COURT By <u>[Signature]</u> Deputy
PEOPLE OF THE STATE OF CALIFORNIA v. DEFENDANT: Suzanne Hanson DATE OF BIRTH: [REDACTED]		
<b>ORDER FOR DISMISSAL</b> (Pen. Code, §§ 17(b), 17(d)(2), 1203.4, 1203.4a, 1203.41, 1203.42, 1203.43, 1203.49)		CASE NUMBER: CRTR 17-3419

This electronic document is the official court record (GC68150)

The court finds from the records on file in this case, and from the foregoing petition, that the petitioner (the defendant in the above-entitled criminal action) is eligible for the following requested relief:

- The court **GRANTS** the petition for reduction of a felony to a misdemeanor (maximum punishment of 364 days per Pen. Code, § 18.5) under Penal Code section 17(b) and/or for reduction of a misdemeanor to an infraction under Penal Code section 17(d)(2) and reduces
  - ALL FELONY CONVICTIONS in the above-entitled action.
  - ALL MISDEMEANOR CONVICTIONS in the above-entitled action.
  - only the following convictions in the above-entitled action (specify charges and date of conviction):
- The court **DENIES** the petition for reduction of a felony to a misdemeanor under Penal Code section 17(b) and/or for reduction of a misdemeanor to an infraction under Penal Code section 17(d)(2) for
  - ALL FELONY CONVICTIONS in the above-entitled action.
  - ALL MISDEMEANOR CONVICTIONS in the above-entitled action.
  - only the following convictions in the above-entitled action (specify charges and date of conviction):
- The court **GRANTS** the petition for dismissal regarding the following convictions under Penal Code (check all that apply)
 

§ 1203.4    § 1203.4a    § 1203.41    § 1203.42    § 1203.43    § 1203.49

and it is ordered that the pleas of guilty or nolo contendere or verdicts or findings of guilt be set aside and vacated and a plea of not guilty be entered and that the complaint or information be, and is hereby, dismissed for (check one)

  - ALL CONVICTIONS OR PLEAS FOR DEFERRED ENTRY OF JUDGMENT in the above-entitled action.
  - only the following convictions or pleas for deferred entry of judgment in the above-entitled action (specify charges and date of conviction or plea for deferred entry of judgment):

2/21/18 VC 23152(a)

1-14  
pcc

PEOPLE OF THE STATE OF CALIFORNIA v. DEFENDANT: Suzanne Hanson	CASE NUMBER: CRTR 17-3419
---	------------------------------

This electronic document is the official court record (GC68150)

4. The court DENIES the petition for dismissal under Penal Code (check all that apply)  
 § 1203.4    § 1203.4a    § 1203.41    § 1203.42    § 1203.43    § 1203.49 for (check one)  
a.  ALL CONVICTIONS OR PLEAS FOR DEFERRED ENTRY OF JUDGMENT in the above-entitled action.  
b.  only the following convictions or pleas for deferred entry of judgment in the above-entitled action (specify charges and date of conviction or plea for deferred entry of judgment):
5. In granting this order under the provisions of Penal Code section 1203.49, the court finds that the petitioner was a victim of human trafficking when he or she committed the crime. The court orders (check one)  
a.  the relief described in section 1203.4.  
b.  the relief described in section 1203.4, with the following exceptions (specify):
6. If the order is granted under the provisions of Penal Code section 1203.49, the Department of Justice is hereby notified that petitioner was a victim of human trafficking when he or she committed the crime, and of the relief ordered.
7. If this order is granted under the provisions of Penal Code section 1203.4, 1203.41, or 1203.42,  
a. the petitioner is required to disclose the above conviction in response to any direct question contained in any questionnaire or application for public office, or for licensure by any state or local agency, or for contracting with the California State Lottery Commission; and  
b. dismissal of the conviction does not automatically relieve petitioner from the requirement to register as a sex offender. (See, e.g., Pen. Code, § 280.5.)
8. If the order is granted under the provisions of Penal Code section 1203.4, 1203.4a, 1203.41, 1203.42, or 1203.49, the petitioner is released from all penalties and disabilities resulting from the offense except as provided in Penal Code sections 29800 and 29900 (formerly sections 12021 and 12021.1) and Vehicle Code section 13555. In any subsequent prosecution of the petitioner for any other offense, the prior conviction may be pleaded and proved and shall have the same effect as if probation had not been granted or the accusation or information dismissed. The dismissal does not permit a person to own, possess, or have in his or her control a firearm if prevented by Penal Code sections 29800 or 29900 (formerly sections 12021 and 12021.1). Dismissal of a conviction does not permit a person prohibited from holding public office as a result of that conviction to hold public office.
9. In addition, as required by Penal Code section 299(f), relief under Penal Code sections 17(b), 17(d)(2), 1203.4, 1203.4a, 1203.41, 1203.42, or 1203.49 does not release petitioner from the separate administrative duty to provide specimens, samples, or print impressions under the DNA and Forensic Identification Database and Data Bank Act (Pen. Code, § 295 et seq.) if petitioner was found guilty by a trier of fact, not guilty by reason of insanity, or pled no contest to a qualifying offense as defined in Penal Code section 296(a).
10. The basis for an order of dismissal granted under the provisions of Penal Code section 1203.43 is the invalidity of defendant's prior plea due to misinformation in former Penal Code section 1000.4 regarding the actual consequences of making a plea and successful completion of a deferred entry of judgment program.

FOR COURT USE ONLY
--------------------

Date: 1/14/22

  
(JUDICIAL OFFICER)

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NUMBER: 311060 NAME: Amit Singh FIRM NAME: Rothschild Wishek & Sands LLP STREET ADDRESS: 765 University Avenue CITY: Sacramento STATE: CA ZIP CODE: 95825 TELEPHONE NO.: (916) 444-8845 FAX NO.: (916) 640-0027 E-MAIL ADDRESS: asingh@rwslaw.com ATTORNEY FOR (name): Suzanne Hanson		FOR COURT USE ONLY <b>Endorsed</b> <b>FILED</b> JAN 14 2022 SUPERIOR COURT OF CALIFORNIA COUNTY OF BUTTE CLERK OF THE COURT By: <i>[Signature]</i> Deputy
PEOPLE OF THE STATE OF CALIFORNIA v. DEFENDANT: Suzanne Hanson DATE OF BIRTH: ██████████		CASE NUMBER: CRIR 17-3419
<b>ORDER FOR DISMISSAL</b> (Pen. Code, §§ 17(b), 17(d)(2), 1203.4, 1203.4a, 1203.41, 1203.42, 1203.43, 1203.49)		

This electronic document is the official court record (GC68150)

The court finds from the records on file in this case, and from the foregoing petition, that the petitioner (the defendant in the above-entitled criminal action) is eligible for the following requested relief:

- The court **GRANTS** the petition for reduction of a felony to a misdemeanor (maximum punishment of 364 days per Pen. Code, § 18.5) under Penal Code section 17(b) and/or for reduction of a misdemeanor to an infraction under Penal Code section 17(d)(2) and reduces
  - ALL FELONY CONVICTIONS in the above-entitled action.
  - ALL MISDEMEANOR CONVICTIONS in the above-entitled action.
  - only the following convictions in the above-entitled action (specify charges and date of conviction):
  
- The court **DENIES** the petition for reduction of a felony to a misdemeanor under Penal Code section 17(b) and/or for reduction of a misdemeanor to an infraction under Penal Code section 17(d)(2) for
  - ALL FELONY CONVICTIONS in the above-entitled action.
  - ALL MISDEMEANOR CONVICTIONS in the above-entitled action.
  - only the following convictions in the above-entitled action (specify charges and date of conviction):
  
- The court **GRANTS** the petition for dismissal regarding the following convictions under Penal Code (check all that apply)
 

§ 1203.4    § 1203.4a    § 1203.41    § 1203.42    § 1203.43    § 1203.49

 and it is ordered that the pleas of guilty or nolo contendere or verdicts or findings of guilt be set aside and vacated and a plea of not guilty be entered and that the complaint or information be, and is hereby, dismissed for (check one)
  - ALL CONVICTIONS OR PLEAS FOR DEFERRED ENTRY OF JUDGMENT in the above-entitled action.
  - only the following convictions or pleas for deferred entry of judgment in the above-entitled action (specify charges and date of conviction or plea for deferred entry of judgment):

2/21/18 VC 23152(a)

1-14  
908

PEOPLE OF THE STATE OF CALIFORNIA v. DEFENDANT: Suzanne Hanson	CASE NUMBER: CRTR 17-3419
---	------------------------------

This electronic document is the official court record (GC68150)

4. The court DENIES the petition for dismissal under Penal Code (check all that apply)  
 § 1203.4    § 1203.4a    § 1203.41    § 1203.42    § 1203.43    § 1203.49 for (check one)  
a.  ALL CONVICTIONS OR PLEAS FOR DEFERRED ENTRY OF JUDGMENT in the above-entitled action.  
b.  only the following convictions or pleas for deferred entry of judgment in the above-entitled action (specify charges and date of conviction or plea for deferred entry of judgment):
5. In granting this order under the provisions of Penal Code section 1203.49, the court finds that the petitioner was a victim of human trafficking when he or she committed the crime. The court orders (check one)  
a.  the relief described in section 1203.4.  
b.  the relief described in section 1203.4, with the following exceptions (specify):
6. If the order is granted under the provisions of Penal Code section 1203.49, the Department of Justice is hereby notified that petitioner was a victim of human trafficking when he or she committed the crime, and of the relief ordered.
7. If this order is granted under the provisions of Penal Code section 1203.4, 1203.41, or 1203.42,  
a. the petitioner is required to disclose the above conviction in response to any direct question contained in any questionnaire or application for public office, or for licensure by any state or local agency, or for contracting with the California State Lottery Commission; and  
b. dismissal of the conviction does not automatically relieve petitioner from the requirement to register as a sex offender. (See, e.g., Pen. Code, § 290.5.)
8. If the order is granted under the provisions of Penal Code section 1203.4, 1203.4a, 1203.41, 1203.42, or 1203.49, the petitioner is released from all penalties and disabilities resulting from the offense except as provided in Penal Code sections 29800 and 29900 (formerly sections 12021 and 12021.1) and Vehicle Code section 13555. In any subsequent prosecution of the petitioner for any other offense, the prior conviction may be pleaded and proved and shall have the same effect as if probation had not been granted or the accusation or information dismissed. The dismissal does not permit a person to own, possess, or have in his or her control a firearm if prevented by Penal Code sections 29800 or 29900 (formerly sections 12021 and 12021.1). Dismissal of a conviction does not permit a person prohibited from holding public office as a result of that conviction to hold public office.
9. In addition, as required by Penal Code section 299(f), relief under Penal Code sections 17(b), 17(d)(2), 1203.4, 1203.4a, 1203.41, 1203.42, or 1203.49 does not release petitioner from the separate administrative duty to provide specimens, samples, or print impressions under the DNA and Forensic Identification Database and Data Bank Act (Pen. Code, § 295 et seq.) if petitioner was found guilty by a trier of fact, not guilty by reason of insanity, or pled no contest to a qualifying offense as defined in Penal Code section 296(a).
10. The basis for an order of dismissal granted under the provisions of Penal Code section 1203.43 is the invalidity of defendant's prior plea due to misinformation in former Penal Code section 1000.4 regarding the actual consequences of making a plea and successful completion of a deferred entry of judgment program.

FOR COURT USE ONLY

Date: 1/14/22

  
(JUDICIAL OFFICER)

# **Exhibit 5**



## PETITION FOR MODIFICATION OF PENALTY PROBATION COMPLIANCE STATUS REPORT

**PETITIONER:** Suzanne Hanson VET 9593

**TYPE OF PETITION:** Termination of Probation

**CASE NUMBER:** 4602018000478

**CONDITIONS AND STATUS:**

- Obey All Laws** : In compliance.
- Quarterly Reports & Interviews** : In compliance.
- Interview with the Board** : In Compliance.
- Cooperation w/ Board Staff** : In compliance.
- Probation Monitoring Costs** : \* See below
- Change of Employment or Address** : In compliance.
- Supervised Practice** : In compliance.
- Notice to Employers** : In compliance.
- Notice to Employees** : In compliance
- Tolling** : In compliance.
- Maintain a Valid License** : Not applicable.
- Violation of Probation** : In compliance.
- License Surrender While on Probation** : In compliance.
- Completion of Probation** : In compliance.
- Cost Recovery and Payment of fine** : \*See Below
- Rehabilitation Program-Alcohol or Drug** : In compliance
- Submit to Drug Testing** : In compliance
- Abstain from Controlled Substances** : In compliance
- Abstention from Alcohol Use** : In compliance
- Fine** : \*See Below

\*Respondent had a total cost of Fines, Costs and Probation Monitoring of \$12,717.50 due and to date there has been \$7,946.00 paid. There is a balance of \$4,771.50 that is due.



This status report is based on all available information in the file.

**Submitted by:** *Kathy Budd* Date 4/6/2022  
Kathy Budd, Probation Monitor