

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

In the Matter of the Citation Against:

Jean Dodds, DVM

Citation No. 2021-21

CITATION

Complainant alleges:

PARTIES

1. Jessica Sieferman (“Complainant”) brings this Citation solely in her official capacity as the Executive Officer of the Veterinary Medical Board (“Board”), Department of Consumer Affairs, State of California.
2. The Board’s records fail to reveal that Jean Dodds (“Respondent”) has been issued a veterinarian license.

STATUTORY PROVISIONS

3. Business and Professions Code (BPC) sections 125.9, 148, and 4875.2 and California Code of Regulations (CCR), title 16, section 2043 authorize the Executive Officer of the Board to issue citations containing orders of abatement and/or administrative fines against a licensee of the Board, or to an unlicensed person, who has committed any acts or omissions in violation of the Veterinary Medicine Practice Act (Act).
4. BPC section 4825 provides that it is unlawful for any person to practice veterinary medicine or any branch thereof in this State unless at the time of so doing, such person holds a valid, unexpired, and unrevoked license as provided in the Act. A person practices veterinary medicine, surgery, and dentistry, and the various branches thereof, when he or she performs any act set forth in BPC section 4826, including representing himself or herself as engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry in any of its branches.

5. BPC section 4826 requires that a person who practices veterinary medicine, surgery, and dentistry, and the various branches thereof, when he or she performs any act set forth in BPC section 4826, including representing himself or herself as engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry in any of its branches.

CAUSE FOR CITATION

6. On or about June 11, 2020, the respondent was listed as a veterinarian on the electronic medical record and handwritten medical record for animal patient "Z". Such unlicensed conduct constitutes a violation of BPC 4825, as defined in BPC 4826, subdivision (a).
7. On or about June 12, 2020, the respondent interpreted lab results and provided a treatment plan for animal patient "Z" via the NutriScan Final Report. Such unlicensed conduct constitutes a violation BPC 4825, as defined in BPC 4826, subdivision (b).
8. On or about June 12, 2020, the respondent signed and was listed as "Jean Dodds, DVM" on the urinalysis for animal patient "Z". Such unlicensed conduct constitutes a violation of BPC 4825, as defined in BPC 4826, subdivision (f).
9. On or about August 6, 2020 the respondent was listed as a veterinarian on the electronic medical record and handwritten medical record for animal patient "Z". Such unlicensed conduct constitutes a violation of BPC 4825, as defined in BPC 4826, subdivision (a).
10. On or about August 6, 2020, the respondent interpreted lab results and provided a treatment plan for animal patient "Z" via the NutriScan Final Report. Such unlicensed conduct constitutes a violation BPC 4825, as defined in BPC 4826, subdivision (b).
11. On or about August 6, 2020, the respondent signed and was listed as "Jean Dodds, DVM" on the urinalysis for animal patient "Z". Such unlicensed conduct constitutes a violation of BPC 4825, as defined in BPC 4826, subdivision (f).
12. On or about December 6, 2020, the respondent was listed as a veterinarian on the electronic medical record for animal patient "Z". Such unlicensed conduct constitutes a violation of BPC 4825, as defined in BPC 4826, subdivision (a).
13. On or about January 27, 2021, the respondent was listed on a NutriScan Report for animal patient "W." Such unlicensed conduct constitutes a violation of BPC 4825, as defined in BPC 4826, subdivision (a).
14. On or about January 27, 2021, the respondent provided diagnosis and treatment recommendations based on the NutriScan Report for animal patient "W." Such

unlicensed conduct constitutes a violation of BPC 4825, as defined in BPC 4826, subdivision (b).

15. On or about January 27, 2021, the respondent was listed on a NutriScan Report for animal patient "W" as "Jean Dodds, DVM." Such unlicensed conduct constitutes a violation of BPC 4825, as defined in BPC 4826, subdivision (f).
16. On or about March 8, 2021, the respondent was listed on a NutriScan Report for animal patient "W." Such unlicensed conduct constitutes a violation of BPC 4825, as defined in BPC 4826, subdivision (a).
17. On or about March 8, 2021, the respondent provided treatment recommendations for animal patient "W" via a NutriGold report. Such unlicensed conduct constitutes a violation of BPC 4825, as defined in BPC 4826, subdivision (b).
18. On or about March 8, 2021, the respondent was listed on a NutriScan Report for animal patient "W" as "Jean Dodds, DVM." Such unlicensed conduct constitutes a violation of BPC 4825, as defined in BPC 4826, subdivision (f).
19. On or about April 28, 2021, the HemoPet webpage listed the respondent as a veterinarian and used the abbreviation "DVM" in connection with the respondent. Such unlicensed conduct constitutes a violation of BPC 4825, as defined in BPC 4826, subdivision (f).

DETERMINATION OF ISSUES
CAUSE OF ACTION

20. Violations exist pursuant to BPC sections 4825, as defined in BPC 4826, subdivision (a) as set forth in Paragraph 6. A cause of action thereby exists.
21. Violations exist pursuant to BPC section 4825, as defined in BPC 4826, subdivision (b) as set forth in Paragraph 7. A cause of action thereby exists
22. Violations exist pursuant to BPC section 4825 as defined in BPC 4826 subdivision (f) as set forth in Paragraph 8. A cause of action thereby exists.
23. Violations exist pursuant to BPC section 4825 as defined in BPC 4826 subdivision (a) as set forth in Paragraph 9. A cause of action thereby exists.
24. Violations exist pursuant to BPC section 4825 as defined in BPC 4826 subdivision (b) as set forth in Paragraph 10. A cause of action thereby exists.
25. Violations exist pursuant to BPC section 4825 as defined in BPC 4826 subdivision

- (f) as set forth in Paragraph 11. A cause of action thereby exists.
26. Violations exist pursuant to BPC section 4825 as defined in BPC 4826 subdivision (a) as set forth in Paragraph 12. A cause of action thereby exists.
27. Violations exist pursuant to BPC section 4825 as defined in BPC 4826 subdivision (a) as set forth in Paragraph 13. A cause of action thereby exists.
28. Violations exist pursuant to BPC section 4825 as defined in BPC 4826 subdivision (b) as set forth in Paragraph 14. A cause of action thereby exists.
29. Violations exist pursuant to BPC section 4825 as defined in BPC 4825 subdivision (f) as set forth in Paragraph 15. A cause of action thereby exists.
30. Violations exist pursuant to BPC section 4825 as defined in BPC 4825 subdivision (a) as set forth in Paragraph 16. A cause of action thereby exists.
31. Violations exist pursuant to BPC section 4825 as defined in BPC 4826 subdivision (b) as set forth in Paragraph 17. A cause of action thereby exists.
32. Violations exist pursuant to BPC section 4825 as defined in BPC 4826 subdivision (f) as set forth in Paragraph 18. A cause of action thereby exists.
33. Violations exist pursuant to BPC section 4825 as defined in BPC 4826 subdivision (f) as set forth in Paragraph 19. A cause of action thereby exists.

PENALTY

34. In compliance with BPC sections 148 and 4875.2 and CCR, title 16, section 2043, it is determined that:

Respondent be cited for a Class "C" violation in the amount of \$5,000 for the Cause for Citation, based upon a determination that the above-described facts set forth in Paragraph 6 constitute violations of BPC section 4825, as defined in BPC 4826, subdivision (a).

Respondent be cited for a Class "C" violation in the amount of \$5,000 for the Cause for Citation, based upon a determination that the above-described facts set forth in Paragraph 7 constitute violations of BPC section 4825, as defined in BPC 4826, subdivision (b).

Respondent be cited for a Class "C" violation in the amount of \$5,000 for the Cause for Citation, based upon a determination that the above-described facts set forth in Paragraph 8 constitute violations of BPC section 4825, as defined BPC 4826, subdivision (f).

Respondent be cited for a Class “C” violation in the amount of \$5,000 for the Cause for Citation, based upon a determination that the above-described facts set forth in Paragraph 9 constitute violations of BPC section 4825, as defined in BPC sections 4826, subdivision (a).

Respondent be cited for a Class “C” violation in the amount of \$5,000 for the Cause for Citation, based upon a determination that the above-described facts set forth in Paragraph 10 constitute violations of BPC section 4825, as defined in BPC sections 4826, subdivision (b).

Respondent be cited for a Class “C” violation in the amount of \$5,000 for the Cause for Citation, based upon a determination that the above-described facts set forth in Paragraph 11 constitute violations of BPC section 4825 as defined in BPC sections 4826, subdivision (f).

Respondent be cited for a Class “C” violation in the amount of \$5,000 for the Cause for Citation, based upon a determination that the above-described facts set forth in Paragraph 12 constitute violations of BPC section 4825 as defined in BPC 4826, subdivision (a).

Respondent be cited for a Class “C” violation in the amount of \$5,000 for the Cause for Citation, based upon a determination that the above-described facts set forth in Paragraph 13 constitute violations of BPC section 4825 as defined in BPC 4826, subdivision (a).

Respondent be cited for a Class “C” violation in the amount of \$5,000 for the Cause for Citation, based upon a determination that the above-described facts set forth in Paragraph 14 constitute violations of BPC section 4825 as defined in BPC 4826, subdivision (b).

Respondent be cited for Class “C” violation in the amount of \$5,000 for the Cause for Citation, based upon a determination that the above described facts set forth in Paragraph 15 constitute violations of BPC section 4825 as defined in BPC 4826, subdivision (f).

Respondent be cited for Class “C” violation in the amount of \$5,000 for the Cause for Citation, based upon a determination that the above described facts set forth in Paragraph 16 constitute violations of BPC section 4825 as defined in BPC 4826 subdivision (a)

Respondent be cited for Class “C” violation in the amount of \$5,000 for the Cause for citation based on a determination that the above described facts set forth in Paragraph 17 constitute violations of BPC section 4825 as defined in BPC 4826 subdivision (b).

Respondent be cited for Class “C” violation in the amount of \$5,000 for the

Cause for citation based on a determination that the above described facts set forth in Paragraph 18 constitute violations of BPC section 4825 as defined in BPC 4826 subdivision (f).

Respondent be cited for Class "C" violation in the amount of \$5,000 for the Cause for citation based on a determination that the above described facts set forth in Paragraph 19 constitute violations of BPC section 4825 as defined in BPC 4826 subdivision (f).

35. In compliance with BPC sections 125.9 and 4875.2, and CCR, title 16, section 2043, subdivision (c), the total penalty for the above violations is \$5,000.

ORDER OF ABATEMENT

36. The Board hereby orders Respondent to cease and desist from violating BPC section 4825, as defined in BPC 4826, subdivisions (a), (b), (f).

10/11/2021

DATE

Signature on File
JESSICA SIEFERMAN
Executive Officer
Veterinary Medical Board
Department of Consumer Affairs
State of California