

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

In the Matter of the Citation Against:

CHRISTOPHER THOMAS MOODY

Respondent

Citation No. 1920-11

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 Christopher Thomas Moody (“Respondent”) has been issued a veterinarian license.
3. The Board’s records fail to reveal that Moody’s Doggy Dental has been issued a veterinary premises registration.

STATUTORY PROVISIONS

4. 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).

5. 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.
6. BPC section 4853 requires all premises, including a building, kennel, mobile unit, or vehicle, where veterinary medicine, veterinary dentistry, veterinary surgery, and the various branches thereof are being practiced to be registered with the Board.

CAUSE FOR CITATION

7. On or about October 13, 2013, Respondent performed dental services on animal patient "Baby" for teeth cleaning and dispensed amoxicillin for 10 days. Pet owner RF paid \$200 with \$15 credit for these dental services rendered. Such unlicensed practice of veterinary medicine constitutes a violation of BPC section 4825 as set forth in BPC section 4826.
8. On or about May 14, 2015, Respondent performed dental services on animal patient "Baby" for teeth cleaning and extraction with gingival hyperplasia removal on the upper left side, then provided a prescription for 25 amoxicillin capsules 250mg ½ cap 2x day for 7 days. Pet owner RF paid \$300 cash for these dental services. Such practice of veterinary medicine by an unlicensed veterinarian constitutes a violation of BPC section 4825 as set forth in BPC section 4826.
9. On or about July 30, 2015, Respondent was convicted by Riverside County Superior Court, Case #RIM1509361, for practicing veterinary medicine without a license. Such unlicensed practice of veterinary medicine constitutes a violation of BPC section 4825 as set forth in BPC section 4826.
10. On or about August 10, 2016, between 8:30pm – 9:00pm, Respondent arrived at pet owner RF's home and took animal patient "Baby" into bathroom, closed the door and extracted six teeth. Respondent then requested pet owner RF's assistance to hold animal patient "Baby" to extract additional teeth. Pet owner RF paid Respondent \$180 in cash, but Respondent failed to provide him a receipt. Such unlicensed practice of veterinary medicine constitutes a violation of BPC section 4825 as set forth in BPC section 4826.
11. On or about December 5, 2016, Respondent was arrested for animal cruelty. A search of Respondent's premises found two bags of medical supplies, veterinary dental tools, baggies with 42 amoxicillin pills 250mg (antibiotics), a Lidocaine patch

5% (prescription medication), and a receipt book with the dates May 17, 2016 through November 30, 2016, for dental cleanings and teeth extractions. On or about March 21, 2019, Respondent was convicted by Riverside Superior Court Case #BAF1700783, for cruelty to animals and unauthorized practice veterinary medicine. Such unlicensed practice of veterinary medicine constitutes a violation of BPC section 4825 as set forth in BPC section 4826.

12. On or about October 13, 2013 through November 30, 2016, Respondent performed unlicensed veterinarian dental procedures under the business name: Moody's Doggy Dental. The Board has not issued a premises registration authorizing veterinary medicine to be performed by Moody's Doggy Dental. Such practice of veterinary medicine constitutes a violation of BPC section 4853.

DETERMINATION OF ISSUES
CAUSE OF ACTION

13. Violations exist pursuant to BPC section 4825, as set forth in BPC section 4826. A cause of action thereby exists.

14. Violations exist pursuant to BPC section 4853. A cause of action thereby exists.

PENALTY

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

Respondent Moody be cited for four Class "B" violations in the amount of \$1,000 each for the Cause for Citation (paragraphs 7-10), based upon a determination that the above-described facts constitute violations of BPC section 4825, as set forth in BPC section 4826.¹

Respondent Moody be cited for a Class "B" violation in the amount of \$4,000 for the Cause for Citation (paragraph 11), based upon a determination that the above-described facts constitute violations of BPC section 4825, as set forth in BPC section 4826.²

Respondent Moody be cited for a Class "C" violation in the amount of \$3,000 for the Cause for Citation (paragraph 12), based upon a determination that the above-described facts constitute violations of BPC section 4853.²

¹Allowable fine pursuant to CCR 2043, subdivision (b) operative February 10, 2000 through September 30, 2016

²Allowable fine pursuant to CCR 2043, subdivision (b) operative October 1, 2016


16. 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 equals \$11,000. However, per BPC section 125.9(b)(3) administrative fee assessed by Board cannot exceed \$5,000. Therefore, total penalty due is \$5,000.

ORDER OF ABATEMENT

The Board hereby orders Respondent to cease and desist from violating BPC sections 4825, set forth in 4826 and 4853.

May 11, 2020

DATE



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