

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

**IN THE MATTER OF THE PETITION FOR TERMINATION OF PROBATION BY:  
BLAKE JONATHAN SPLAN**

**Agency Case No. 1002093929 / IA 2015 13**

**Office of Administrative Hearings Case No. 2022050637**

**PETITION FOR TERMINATION OF PROBATION PACKET**

<b>TAB #</b>	<b>DOCUMENT</b>
<b>1</b>	<ul style="list-style-type: none"><li>• <b>Notice of Hearing</b></li></ul>
<b>2</b>	<ul style="list-style-type: none"><li>• <b>License Certification for Blake Jonathan Splan, Registered Veterinary Technician Number RVT 12833</b></li></ul>
<b>3</b>	<ul style="list-style-type: none"><li>• <b>Decision and Order in <i>In the Matter of the Statement of Issues Against: Jonathan Splan</i>, Veterinary Medical Board Case Number 1002093929 / IA 2015 13, and Statement of Issues</b></li></ul>
<b>4</b>	<ul style="list-style-type: none"><li>• <b>(Redacted) Petitioner's Petition for Termination of Probation, Received April 29, 2022</b><ul style="list-style-type: none"><li>• <b>Petition Narrative, Dated April 27, 2022</b></li><li>• <b>Petitioner's Resume</b></li><li>• <b>Ramona Turner, DVM, Letter Dated January 27, 2022</b></li><li>• <b>Lisa Ferretti, DVM, Letter Dated April 10, 2022</b></li></ul></li></ul>
<b>5</b>	<ul style="list-style-type: none"><li>• <b>Probation Compliance Status Report, Dated May 2, 2022</b></li></ul>

# EXHIBIT 1



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

May 13, 2022

Blake Jonathan Splan  
PO BOX 74  
Tollhouse, CA 93667-0074  
[REDACTED]

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

Dear Mr. Splan:

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: Jeff Stone, Deputy Attorney General



**DECLARATION OF SERVICE BY CERTIFIED MAIL**

**RE: Case Number 1002093929**

**LICENSE NO: 12833**

I, the undersigned declare that I am over 18 years of age; my business address is 1747 N. Market Boulevard, Suite 230, Sacramento, CA 95834. I served a true copy of the attached letter by Certified Mail on the following, by placing same in an envelope addressed as follows:

**NAME AND ADDRESS**

Blake Splan  
 PO BOX 74  
 Tollhouse, CA 93667-0074

**CERTIFIED NUMBER:**

7022 0410 0002 3623 7779

Said envelope was then, on **May 13, 2022**, sealed and deposited in the United States Mail at 1747 N. Market Boulevard, Suite 230, Sacramento, CA 95834, the county in which I am employed, as certified mail with postage thereon fully prepaid, return receipt requested.

Executed on **May 13, 2022**, at Sacramento, California.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOREGOING IS TRUE AND CORRECT.

**DECLARANT:**

*RL*

**Probation Monitor  
 Veterinary Medical Board**

<b>U.S. Postal Service™          CERTIFIED MAIL® RECEIPT</b> <i>Domestic Mail Only</i>	
For delivery information, visit our website at <a href="http://www.usps.com">www.usps.com</a> ®.	
OFFICIAL USE	
Certified Mail Fee \$ _____ Extra Services & Fees (check box, add fee as appropriate) <input type="checkbox"/> Return Receipt (hardcopy) \$ _____ <input type="checkbox"/> Return Receipt (electronic) \$ _____ <input type="checkbox"/> Certified Mail Restricted Delivery \$ _____ <input type="checkbox"/> Adult Signature Required \$ _____ <input type="checkbox"/> Adult Signature Restricted Delivery \$ _____ Postage \$ _____ <b>Total Postage and Fees</b> \$ _____	Postmark Here
Sent To <b>BLAKE SPLAN</b> Street and Apt. No., or PO Box No. <b>PO Box 74</b> City, State, ZIP+4® <b>TOLLHOUSE, CA 93667-0074</b>	
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions	

7022 0410 0002 3623 7779

# 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 Blake Jonathan Splan. 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:

**RVT No. 12833:**

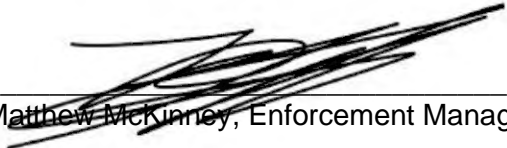
Blake Jonathan Splan  
PO BOX 74  
Tollhouse, CA 93667-0074

First Issued: June 19, 2018  
Expiration: July 31, 2023  
Status: Current  
Secondary Status: Probation

**Discipline:**

On December 9, 2015, a Decision and Order became effective adopting the Stipulated Settlement and Disciplinary Order in the matter of the Statement of Issues filed against Blake Jonathan Splan, case # IA 2015 13 filed on May 13, 2015. The Order placed Blake Jonathan Splan on probation for five years with terms and conditions.

Given under my hand at Sacramento, California, this 3<sup>rd</sup> day of May, 2022.

  
\_\_\_\_\_  
Matthew McKinney, Enforcement Manager

# EXHIBIT 3



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

In the Matter of the Statement of Issues  
Against:

Case No. IA 2015 13

BLAKE JONATHAN SPLAN

Registered Veterinary Technician License  
Applicant

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 December 9, 2015

It is so ORDERED November 9, 2015.

M. A. T. Nung, DVM  
FOR THE VETERINARY MEDICAL BOARD  
DEPARTMENT OF CONSUMER AFFAIRS

1 KAMALA D. HARRIS  
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) 324-5333  
Facsimile: (916) 327-8643  
7 *Attorneys for Complainant*

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

11 In the Matter of the Statement of Issues  
Against:  
12 **BLAKE JONATHAN SPLAN**  
13 **Registered Veterinary Technician License**  
14 **Applicant**  
15 **Respondent.**

Case No. IA 2015 13  
**STIPULATED SETTLEMENT AND**  
**DISCIPLINARY ORDER**

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

19 PARTIES

20 1. Annemarie Del Mugnaio ("Complainant") is the Executive Officer of the Veterinary  
21 Medical Board, Department of Consumer Affairs. She brought this action solely in her official  
22 capacity and is represented in this matter by Kamala D. Harris, Attorney General of the State of  
23 California, by Karen R. Denvir, Deputy Attorney General.

24 2. Respondent Blake Jonathan Splan ("Respondent") is represented in this proceeding  
25 by attorney Jordan M. Freeman, whose address is: 8050 N. Palm Avenue, Suite 300,  
26 Fresno, California 93711.

27 3. On or about June 2, 2014, Respondent filed an application dated April 29, 2014, with  
28 the Veterinary Medical Board to obtain a Registered Veterinary Technician License.



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CONTINGENCY

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

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

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

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

DISCIPLINARY ORDER

IT IS HEREBY ORDERED that a Registered Veterinary Technician License will be issued to Respondent Blake Jonathan Splan and immediately revoked. The revocation will be stayed and the Respondent placed on five (5) years probation on the following terms and conditions.

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**1. Obey All Laws.**

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

**2. Quarterly Reports and Interviews**

Respondent shall report quarterly to the Board or its designee, under penalty of perjury, on forms provided by the Board, stating whether there has been compliance with all terms and conditions of probation. In addition, the Board at its discretion may request additional in-person reports of the probationary terms and conditions. If the final written quarterly report is not made as directed, the period of probation shall be extended until such time as the final report is received by the Board. Respondent shall make available all patient records, hospital records, books, logs, and other documents to the Board, upon request.

**3. Cooperation with Probation Surveillance**

Respondent shall comply with the Board's probation surveillance program. All costs for probation monitoring and/or mandatory premises inspections shall be borne by Respondent. Probation monitoring costs are set at a rate of \$100 per month for the duration of the probation. Respondent shall notify the Board of any change of name or address or address of record within thirty (30) days of the change. Respondent shall notify the Board immediately in writing if Respondent leaves California to reside or practice in another state. Respondent shall notify the Board immediately upon return to California.

**4. No Preceptorships or Supervision of Interns**

Respondent shall not supervise a registered intern and shall not perform any of the duties of a preceptor.

**5. Notice to Employers**

Respondent shall notify all present and prospective employers of the decision in this case and the terms, conditions, and restrictions imposed on Respondent by the decision in this case. Within thirty (30) days of the effective date of this decision and within fifteen (15) days of

1 Respondent undertaking new employment, Respondent shall cause his employer to report to the  
2 Board in writing, acknowledging the employer has read the Accusation and decision in this case  
3 and understands Respondent's terms and conditions of probation. Relief veterinarians shall notify  
4 employers immediately.

5 **6. Notice to Employees**

6 Respondent shall, upon or before the effective date of this decision, post or circulate a  
7 notice which actually recites the offenses for which Respondent has been disciplined and the  
8 terms and conditions of probation, to all registered veterinary employees, and to any preceptor,  
9 intern or extern involved in his veterinary practice. Within fifteen (15) days of the effective date  
10 of this decision, Respondent shall cause his employees to report to the Board in writing,  
11 acknowledging the employees have read the Statement of Issues and decision in the case and  
12 understand Respondent's terms and conditions of probation.

13 **7. Owners and Officers (Corporations or Partnerships): Knowledge of the Law**

14 Respondent shall provide, within thirty (30) days after the effective date of the decision,  
15 signed and dated statements from the owners, officers, or any owner or holder of ten percent  
16 (10%) or more of the interest in Respondent or Respondent's stock, stating said individuals have  
17 read and are familiar with federal and state laws and regulations governing the practice of  
18 veterinary medicine.

19 **8. Tolling of Probation**

20 If Respondent resides out of state upon or after effective date of the decision, he must  
21 comply with the following conditions only: quarterly reports and interviews, tolling of probation,  
22 continuing education and cost recovery. If Respondent returns to California he must comply or be  
23 subject to all probationary conditions for the period of probation.

24 Respondent, during probation, shall engage in the practice of veterinary medicine in  
25 California for a minimum of 24 hours per week for six (6) consecutive months or as determined  
26 by the Board. Should Respondent fail to engage in the practice of veterinary medicine in  
27 California as set forth above, the time outside of the practice shall not apply to reduction of the  
28 probationary terms.

1           9.    **Violation of Probation**

2           If Respondent violates probation in any respect, the Board, after giving Respondent notice  
3 and the opportunity to be heard, may revoke probation and carry out the disciplinary order that  
4 was stayed. If an accusation or petition to revoke probation is filed against Respondent during  
5 probation, or if the Attorney General's office has been requested to prepare any disciplinary  
6 action against Respondent's license, the Board shall have continuing jurisdiction until the matter  
7 is final, and the period of probation shall be extended until the matter is final.

8           10.   **Completion of Probation**

9           All costs for probation monitoring and/or mandatory premises inspections shall be borne by  
10 Respondent. Failure to pay all costs due shall result in an extension of probation until the matter  
11 is resolved and costs paid. Upon successful completion of probation and all payment of all fees  
12 due, Respondent's license will be fully restored.

13          11.   **Limitation on Practice/Inspections**

14          During probation, Respondent is prohibited from the following:

15          Practicing veterinary medicine from a location or mobile veterinary practice which does not  
16 have a current premises permit issued by the Board.

17          12.   **No Ownership**

18          Respondent shall not have any legal or beneficial interest in any business, firm, partnership,  
19 or corporation currently or hereinafter licensed or registered by the Board and shall not own any  
20 veterinary hospital.

21          13.   **No Management or Administration**

22          Respondent shall not manage or be the administrator of any veterinary hospital.

23          14.   **Psychological Evaluation**

24          As of the effective date of the decision, Respondent shall not engage in the practice of  
25 veterinary medicine until notified in writing by the Board of this determination that Respondent is  
26 mentally fit to practice safely. If recommended by the psychotherapist (psychiatrist or  
27 psychologist) and approved by the Board or its designee, Respondent shall be barred from  
28 practicing veterinary medicine until the treating psychotherapist recommends, in writing and

1 stating the basis therefore, that Respondent can safely practice veterinary medicine, and the Board  
2 approves said recommendation. All costs shall be borne by Respondent.

3 **15. Psychotherapy**

4 Within thirty (30) days of the effective date of this decision, Respondent shall submit to the  
5 Board, for its prior approval, the name and qualifications of one or more psychotherapists of  
6 Respondent's choice. Upon approval, Respondent shall undergo and continue treatment until the  
7 Board deems that no further psychotherapy is necessary. Respondent shall have the treating  
8 psychotherapist submit quarterly status reports to the Board. The Board may require Respondent  
9 to undergo psychiatric evaluations by a Board-appointed psychiatrist. All costs shall be borne by  
10 Respondent.

11 **16. Medical Evaluation**

12 As of the effective date of this decision, Respondent shall not engage in the practice of  
13 veterinary medicine until notified in writing by the Board of its determination that Respondent is  
14 medically fit to practice safely. If recommended by the physician and approved by the Board or  
15 its designee, Respondent shall be barred from practicing veterinary medicine until the treating  
16 physician recommends, in writing and stating the basis therefore, that Respondent can safely  
17 practice veterinary medicine, and the Board approves said recommendation.

18 **17. Rehabilitation Program – Alcohol or Drug**

19 Within thirty (30) days of the effective date of this decision, Respondent shall submit in  
20 writing a(n) alcohol/drug rehabilitation program in which Respondent shall participate to the  
21 Board for its prior approval. In the quarterly written reports to the Board, Respondent shall  
22 provide documentary evidence of continuing satisfactory participation in this program. All costs  
23 shall be borne by Respondent. Respondent shall provide documentary evidence of completion of  
24 the program upon completion.

25 **18. Submit to Drug Testing**

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



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19. **Abstain from Controlled Substances**

Respondent shall completely abstain from the personal use or possession of controlled substances, as defined in the California Uniform Controlled Substances Act, and dangerous drugs as defined in Section 4211 of the Business and Professions Code, except when lawfully prescribed by a licensed practitioner for a bona fide illness. Respondent shall submit to random drug testing during the period of probation.

20. **Abstention from Alcohol Use**

Respondent shall abstain completely from the use of alcoholic beverages.

ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Jordan M. Freeman. I understand the stipulation and the effect it will have on my Registered Veterinary Technician License. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Veterinary Medical Board.

DATED:

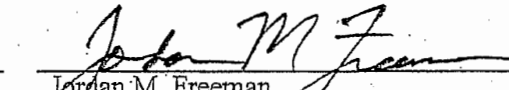
8/27/15

  
BLAKE JONATHAN SPLAN  
Respondent

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

DATED:

8/27/15

  
Jordan M. Freeman  
Attorney for Respondent

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ENDORSEMENT

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

Dated: *September 21, 2015*

Respectfully submitted,

KAMALA D. HARRIS  
Attorney General of California  
JANICE K. LACHMAN  
Supervising Deputy Attorney General



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

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1 KAMALA D. HARRIS  
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) 324-5333  
Facsimile: (916) 327-8643  
7 *Attorneys for Complainant*

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

11 In the Matter of the Statement of Issues  
Against:

Case No. IA 2015 13

12 **BLAKE JONATHAN SPLAN**

STATEMENT OF ISSUES

13 Veterinary Technician License Applicant

14 Respondent.

15  
16 Annemarie Del Mugnaio ("Complainant") alleges:

17 PARTIES

18 1. Complainant brings this Statement of Issues solely in her official capacity as the  
19 Executive Officer of the Veterinary Medical Board ("Board"), Department of Consumer Affairs.

20 2. On or about June 2, 2014, the Board received an application for a Registered  
21 Veterinary Technician License from Blake Jonathan Splan ("Respondent"). On or about  
22 April 29, 2014, Respondent certified under penalty of perjury to the truthfulness of all statements,  
23 answers, and representations in the application. The Board denied the application on August 12,  
24 2014.

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STATUTORY PROVISIONS

1  
2 3. Business and Professions Code ("Code") section 4842 provides, in pertinent part, that  
3 the Board may deny an application to take a written and practical examination for registration as a  
4 registered veterinary technician if the applicant has done any of the following:

5 (c) Knowingly made any false statement in the application.

6 (d) Been convicted of a crime substantially related to the qualifications,  
7 functions and duties of a registered veterinary technician.

8 4. Code section 4837 provides:

9 The board may revoke or suspend the registration of a registered veterinary  
10 technician in this state after notice and hearing for any cause provided in this article.  
11 The proceedings under this article shall be conducted in accordance with the  
12 provisions for administrative adjudication in Chapter 5 (commencing with Section  
13 11500) of Part 1 of Division 3 of Title 2 of the Government Code, and the board shall  
14 have all the powers granted therein. The board may revoke or suspend a certificate of  
15 registration for any of the following reasons:

16 (a) The employment of fraud, misrepresentation or deception in obtaining a  
17 registration.

18 (b) Conviction of a crime substantially related to the qualifications, functions,  
19 and duties of a registered veterinary technician in which case the record of such  
20 conviction will be conclusive evidence.

21 5. Code section 4885 states:

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

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1 6. Code section 480 states, in pertinent part:

2 (a) A board may deny a license regulated by this code on the grounds that the  
3 applicant has one of the following:

4 (1) Been convicted of a crime. A conviction within the meaning of this section  
5 means a plea or verdict of guilty or a conviction following a plea of nolo contendere.  
6 Any action that a board is permitted to take following the establishment of a  
7 conviction may be taken when the time for appeal has elapsed, or the judgment of  
8 conviction has been affirmed on appeal, or when an order granting probation is made  
9 suspending the imposition of sentence, irrespective of a subsequent order under the  
10 provisions of Section 1203.4, 1203.4a, or 1203.41 of the Penal Code.

11 (3)(A) Done any act that if done by a licentiate of the business or profession in  
12 question, would be grounds for suspension or revocation of license..

13 (B) The board may deny a license pursuant to this subdivision only if the crime  
14 or act is substantially related to the qualifications, functions, or duties of the business  
15 or profession for which application is made.

16 (b) Notwithstanding any other provision of this code, a person shall not be  
17 denied a license solely on the basis that he or she has been convicted of a felony if he  
18 or she has obtained a certificate of rehabilitation under Chapter 3.5 (commencing  
19 with Section 4852.01) of Title 6 of Part 3 of the Penal Code or that he or she has been  
20 convicted of a misdemeanor if he or she has met all applicable requirements of the  
21 criteria of rehabilitation developed by the board to evaluate the rehabilitation of a  
22 person when considering the denial of a license under subdivision (a) of Section 482.

23 (c) Notwithstanding any other provisions of this code, a person shall not be  
24 denied a license solely on the basis of a conviction that has been dismissed pursuant  
25 to Section 1203.4, 1203.4a, or 1203.41 of the Penal Code. An applicant who has a  
26 conviction that has been dismissed pursuant to Section 1203.4, 1203.4a, or 1203.41 of  
27 the Penal Code shall provide proof of the dismissal.

28 (d) A board may deny a license regulated by this code on the ground that the  
applicant knowingly made a false statement of fact that is required to be revealed in  
the application for the license.

FIRST CAUSE FOR DENIAL OF APPLICATION

(Criminal Convictions)

7. Respondent's application is subject to denial pursuant to Code sections 4842(d), and  
480(a)(1), in that Respondent was convicted of crimes substantially related to the qualifications,  
functions and duties of a registered veterinary technician, as follows:

a. On or about February 5, 2008, in the Superior Court of California, County of Fresno,  
in the case entitled *People v. Blake Jonathan Splan*, Case Number F07907944, Respondent was  
convicted following his plea of nolo contendere to violations of: Vehicle Code section 23152(b)

1 (driving under the influence of alcohol while having a blood alcohol level of .08% or higher), a  
2 misdemeanor, with a stipulation that Respondent's blood alcohol level was .08%; and, Health and  
3 Safety Code section 11350(a) (illegal possession of cocaine, a controlled substance), a felony.<sup>1</sup>

4 The circumstances of the crimes are that on or about September 29, 2007, Respondent was found  
5 to be driving under the influence of alcohol and was in possession of narcotics, including cocaine.

6 b. On or about August 8, 2008, in the Superior Court of California, County of Fresno,  
7 in the case entitled *People v. Blake Jonathan Splan*, Case Number F08905098, Respondent was  
8 convicted following his plea of guilty to a violation of Health and Safety Code section 11379(a)  
9 (transport of methamphetamine, a controlled substance classified under Health and Safety Code  
10 section 11055(d), without a lawful prescription), a felony.<sup>2</sup> The circumstances of the crime are  
11 that on or about August 5, 2008, Respondent transported methamphetamine in Fresno County for  
12 personal use.

#### 13 SECOND CAUSE FOR DENIAL OF APPLICATION

14 (False Statement on Application)

15 8. Respondent's application is subject to denial pursuant to Code sections 4842(c), and  
16 480(d), in that Respondent knowingly made a false statement in his application for a registered  
17 veterinary technician license. Specifically, Respondent answered "No" to question 8 of the  
18 Registered Veterinary Technician Application, which states, in pertinent part:

19 HAVE YOU EVER BEEN CONVICTED OF ANY OFFENSE  
20 OTHER THAN MINOR TRAFFIC VIOLATIONS OR PLED NO  
21 CONTEST TO A VIOLATION OF ANY LAW OF ANY  
STATE, THE UNITED STATES OR A FOREIGN COUNTRY?

22 In fact, Respondent was convicted of crimes, as set forth in paragraph 7, subparagraphs a  
23 and b, above.

24 ///

25 \_\_\_\_\_  
26 <sup>1</sup> On or about May 18, 2012, the Fresno County Superior set aside Respondent's guilty  
27 plea in Case No. F07907944 as to a violation of Health and Safety Code section 11350(a), and  
that charge was subsequently dismissed pursuant to Penal Code section 1203.4.

28 <sup>2</sup> On or about May 18, 2012, the Fresno County Superior set aside Respondent's guilty  
plea in Case No. F08905098 and the case was dismissed pursuant to Penal Code section 1203.4.

THIRD CAUSE FOR DENIAL OF APPLICATION

(Committed Act Which If Done By a Licentiate)

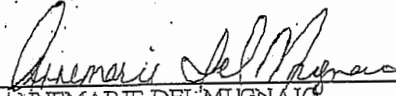
9. Respondent's application is subject to denial pursuant to Code section 480(a)(3)(A), in that Respondent committed an act that if done by a licentiate of the profession would constitute grounds for suspension or revocation of a license under Code section 4837(b) (conviction of a crime), as set forth above in paragraph 7, above.

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. Denying the application of Blake Jonathan Splan for a Registered Veterinarian Technician License, and
2. Taking such other and further action as deemed necessary and proper.

DATED: May 13, 2015

  
ANNEMARIE DEL MUGNAIO  
Executive Officer  
Veterinary Medical Board  
Department of Consumer Affairs  
State of California  
*Complainant*

SA2014118951  
11765828.doc

# EXHIBIT 4





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.

<b>TYPE OF PETITION [Reference Business and Professions Code section 4887]</b>			
<input type="checkbox"/> Reinstatement of Revoked/Surrendered License or Registration	<input type="checkbox"/> Modification of Probation	<input checked="" type="checkbox"/> Termination of Probation	
<p><b>NOTE:</b> 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.</p>			
<b>PERSONAL INFORMATION</b>			
NAME: First		Middle	Last
Blake		Jonathan	Splan
Other name(s) licensed under, if any:			
HOME ADDRESS: Number & Street		City	State
[REDACTED]		[REDACTED]	[REDACTED]
HOME TELEPHONE NUMBER	WORK TELEPHONE NUMBER	CELL NUMBER	
( )	( )	[REDACTED]	
E-mail address:		CA License or Registration Number	
[REDACTED]		RVT 12833	
Are you licensed by any other state(s) or country(ies) (please include license number(s), issue date(s), and status of license(s)):			
No			
<b>ATTORNEY INFORMATION (If Applicable)</b>			
Will you be represented by an attorney? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes (If "Yes," please provide the following information)			
NAME:			
ADDRESS:			
PHONE:			
<b>DISCIPLINARY INFORMATION</b>			
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? <input checked="" type="checkbox"/> No <input type="checkbox"/> 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.)			

**VETERINARIAN/REGISTERED TECHNICIAN BACKGROUND**

Total number of years in veterinary practice: 14

**CONTINUING EDUCATION** (List continuing education completed since the date of the disciplinary action)

American Association of Feline Practitioners October 2019  
Anesthesia Refresher: Don't forget the basics! September 2019  
Fear Free Dermatology August 2019  
Management of Canine Inappetence November 2018  
Tackling Feline Lower Urinary Tract Signs September 2018

**CURRENT OCCUPATION OTHER THAN VETERINARIAN OR REGISTERED VET TECHNICIAN**

(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:

24/7 Pet Vets 1639 N Fresno St, Fresno, CA 93703 info@247petvets.com (559) 486-0520 RVT  
March 2022- present

**EMPLOYMENT HISTORY** (list for the past 5 years only)

Provide the employer's name, address, phone number, job title and dates of employment:

Fresno Cat Hospital owned by Dr. Ramona Turner 1119 E. Shaw, Fresno, CA 93710 (559) 222-7752 Assistant 2007- 2018 RVT 2018 - March 2022 The doctor who owned the practice is deceased. You may contact her daughter at [REDACTED] for confirmation of employment,

**REHABILITATION**

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.

Alocholics Anonymous once to twice a month

**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? \_\_\_\_\_  
When is payment anticipated? \_\_\_\_\_

**DECLARATION**

Executed on April 27th, 20\$22, at Tollhouse, 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.

Blake Splan \_\_\_\_\_ Blake Splan \_\_\_\_\_  
Petitioner (print name) 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.

Petition Narrative

April 27, 2022

To the California Veterinary Medical Board,

The packet that I submitted for my license has in depth information pertaining to my past offenses, state of being, and the inpatient rehabilitation program I attended. Here is a reduced summary of the events. I was arrested for drug related felonies and placed on Probation. I did not complete the terms of Probation and was arrested for another drug felony. At that time my family stepped in and sent me to rehab. After completing the inpatient rehab I was released back onto probation. I did not complete the probation due to still using illicit substances. I was placed on a higher form of court monitored probation. After completing this probation I continued to use drugs. After a few years of this, I returned to the inpatient rehabilitation for a 2nd time. When I completed the Court Probation I thought that my charges would be reduced and dismissed and that I no longer needed to mark that I had been convicted of a felony. I understand that I fraudulently represented myself on the application. It was never my intention to deceive the board, but I did attempt to deceive by not being fully honest.

Since then I have not used drugs or alcohol, completed my schooling to get my Technician license, obtained my license, and started probation with the Veterinary Medical Board. I am writing this narrative to show the ways that I have improved, am continuing to improve, and to seek early termination of my probation.

I have attended Alcoholics Anonymous and Continuing Education meetings. During the height of the pandemic I did not attend AA. I started attending again when I was okay with being around strangers. I was a full time Employee at the Fresno Cat Hospital. The doctor knew of my struggles. She was very considerate of me and the restrictions I had to follow. She and I worked together to provide a safe working environment and a high level of care to all the patients we saw. We frequently reviewed new medications and practices together to see if they would work for our clients and patients. She has recently passed away and it has been a huge blow to me. Through this trying time I have not had the urge to use drugs or alcohol.

In searching for a new job I have taken the lesson I learned from applying for my Registered Veterinary Technician seriously. It has been a top priority to tell prospective employers that I am on probation. I know that this is a requirement, but previously I was ashamed of the situation and attempted to hide it. Now I announce it clearly and am comfortable when talking to people about it. I understand that I lied on my application for my license. While it was not my intention to deceive, I still participated in attempting to deceive others. There is no place for this in employers, employees, and coworkers.

I am submitting a Letter of recommendation from my previous employer. She was critical in my start and continuation of Veterinary Medicine. She passed away suddenly in February. Her daughter Sierra Parker was the manager of the Fresno Cat Hospital for the first 13 years I worked there. You may contact her at [REDACTED]. Dr. Turner's son, Terran Ferguson, and I are close friends. You may contact him at [REDACTED] to ask any questions validating my employment or the doctor's opinion of me. Dr. Lisa Ferretti, who my other letter of recommendation is from, also knows Dr. Turner well and can be contacted for any other

Petition Narrative

information. My Current employer Janet Heisinger was friends with Dr. Turner and can be contacted if any additional information is needed.

Thank You for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Blake Splan". The signature is written in a cursive style and is followed by a long horizontal line that extends to the right across the page.

Blake Splan, RVT 12433

# Blake Splan

Registered Veterinary Technician

PO Box 74  
Tollhouse, CA 93667



## EXPERIENCE

### **Fresno Cat Hospital, Fresno, CA — RVT**

June 2018 - PRESENT

Perform blood & urine diagnostics, Radiographs, assisting in surgery, maintain and clean surgery and diagnostic tools, provide medication administration counseling.

### **Fresno Cat Hospital, Fresno, CA — Assistant**

October 2007 - June 2018

Assist with performing exams, obtaining signalment, scheduling appointments, keeping hospitalized patients in clean quarters, maintaining a clean hospital.

### **Kennolyn Camps, Santa Cruz, CA — Cabin Counselor**

May 2007 - September 2007

An in cabin counselor for kids age 7-12, taught fencing. Maintained safety on a Ropes and High Ropes course, ensured all campers were happy and got to all courses.

## EDUCATION

### **Veterinary Allied Staff Education, Online — Certificate**

January 2013 - May 2013

Distance learning of veterinary required skills to complete alternate route of obtaining Technician License.

### **Bullard High School, Fresno, CA — High School Diploma**

August 2001 - June 2005

## SKILLS

Client medications counseling

Managing multi-line phone systems

Phlebotomy

Performing Radiographs

Able to care for multiple pets at a time

Time Management

Multitasking

## AWARDS

Eagle Scout - Boy Scouts of America

## LANGUAGES

English

# *Fresno Cat Hospital*

1119 E Shaw Ave • Fresno CA • 93710  
(559) 222-7752

January 27, 2022

To Whom It May Concern:

I am writing this letter in recommendation and support of Blake Splan. I would strongly urge you to review his progress and allow early termination of his probation.

Blake has been employed by Fresno Cat Hospital for 14 years. In that time, I have watched him grow as an employee and mature into a fine person. Blake is a dedicated husband and father. I have had many interactions with his family. He is a good provider and very supportive of his wife and son. I have no reservations about his personality or demeanor.

As an employee I have watched him grow from entry level to a Registered Veterinary Technician. This was no easy accomplishment, as he was working full time and taking intensive courses. He passed his boards on the first attempt. He is skilled, very well educated, and easily the best employee I have ever had. To say he is key to the success and smooth running of this practice is no exaggeration. Please take this into consideration when deciding on early termination of his probation. I cannot recommend him highly enough.

Sincerely,



Ramona L. Turner, DVM  
License 8056

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

4/10/2022

To whom it may concern,

My name is Dr. Lisa Ferretti, and I am a traveling radiology consultant who reviews radiographs and performs ultrasound exams on patients at different practices as needed. One of the facilities I have performed such services at is Fresno Cat Hospital, where I met Blake Splan. When I first met Blake he was an assistant and I did not interact with him often. I knew of his drug problems and was aware that he had been to rehabilitation programs. After a change in staff at the Fresno Cat Hospital, he started being more involved with radiographs and ultrasounds, and was given more responsibility.

Roughly 10 years ago, I noticed that he started asking more in depth questions about the process of taking radiographs and ultrasound exams. He informed me that he was starting an online course to complete the schooling in order to become licensed. I became aware of the Board's decision to place him on probation at the beginning of his licensure. In an effort to grow his skillset, Blake started keeping radiographs aside for me to evaluate his technique and interpreting skills. His technique for providing radiographs of a good diagnostic quality improved dramatically over the years due to his eagerness to learn. Frequently, he would be present for ultrasound exams and was able to identify crucial elements during each exam. He was a pleasure to work with during my traveling visits to Fresno Cat Hospital.

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



Dr. Lisa Ferretti, DVM



ca Ver License  
12009



# EXHIBIT 5



## PETITION FOR MODIFICATION OF PENALTY PROBATION COMPLIANCE STATUS REPORT

**PETITIONER:** Blake Splan (RVT 12833)

**TYPE OF PETITION:** Termination of Probation

**CASE NUMBER:** 1002093929

**CONDITIONS AND STATUS:**

- Obey All Laws** : In compliance
- Quarterly Reports & Interviews** : In compliance
- Cooperation w/ Probation Surveillance** : In compliance
- No Preceptorships** : In compliance
- Notice to Employers** : In compliance
- Notice to Employees** : In compliance
- Owners and Officers** : In compliance
- No Ownership** : In compliance
- Completion of Probation** : In compliance
- Limitation on Practice/Inspections** : In compliance
- Psychological Evaluation** : In compliance
- Psychotherapy** : In compliance
- Medical Evaluation** : In compliance
- Rehabilitation Program** : In compliance
- No Management or Administration** : In compliance
- Tolling** : Not applicable
- Violation of Probation** : In compliance
- Submit to Drug Testing** : In compliance
- Abstain from Controlled Substances** : In compliance
- Abstention from Alcohol Use** : In compliance

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

*RW*

Submitted by: \_\_\_\_\_ Date May 2, 2022  
Jeffrey Weiler, Probation Monitor