



MEMORANDUM

DATE	October 3, 2012
TO	Board Members
FROM	Sandra Monterrubio Enforcement Program Manager
SUBJECT	Petition for Reinstatement-Ignacio Lambarri- October 16, 2012

Ignacio Lambarri, DVM is petitioning the Board for Reinstatement of his veterinary license. Dr. Lambarri's license was revoked in August 2010. Prior to Dr. Lambarri's 2010 revocation, he was disciplined in 2002 and 2006. Attached is the Division of Investigation's investigative report, which includes 11 attachments. Attachments 1-6 are copies of Dr. Lambarri's discipline orders, and attachment 8 is a copy of his Petition for Reinstatement. Also included is the Board's Guidelines for Petition and Non Adoption Proceedings.

The Petition for Reinstatement hearing will be held on October 16, 2012 at 2:00 p.m. If you have any questions, please call me at (916) 263-1570.

GUIDELINES FOR PETITION & NON ADOPTION PROCEEDINGS

The purpose of this policy is to provide guidance to all persons involved, including the parties, the Administrative Law Judge (ALJ) and the Board of Veterinary Medicine (Board) members, in proceedings for petition for penalty relief, reinstatement, modification or termination of probation or non-adoption of a proposed decision.

The Board's authority to hear such petitions is outlined in Business and Professions Code, Section 4887 as follows:

1. The Board allows the parties to present written or oral argument when it has non-adopted an ALJ proposed decision, a decision has been remanded back to the Board or when a petition for penalty relief has been filed.
2. The Board has requested the presence of an ALJ during oral arguments or proceedings for penalty relief. The ALJ is expected to preside over the proceedings, provide legal and practical assistance to the Board members, and write the final decision.
3. The ALJ, Board members and other parties to the proceeding should review and discuss the ground rules for the proceedings, which include, but are not necessarily limited to, the following:
 - (a) For non-adoption/remand proceedings, the arguments must be based on the existing record. No new evidence will be heard.
 - (b) For petition for penalty relief proceedings, the testimony should focus on evidence of rehabilitation and why the respondent no longer presents a risk to re-offend and not in rehashing previous revocation or probation decisions.
 - (c) The Board members may ask questions of the parties to clarify testimony, but the ALJ should disallow questions that are inappropriate or that solicit new evidence.
 - (d) The Deputy Attorney General representing the people is responsible for submitting all original petitions for penalty relief documents into evidence as to acts leading to discipline.
 - (e) The sequence of time limitations on oral argument and penalty relief proceedings are as follows:

First, respondent/petitioner-15 minutes
Second, Deputy Attorney General/Complainant-15 minutes
Third, respondent/petitioner rebuttal- 5minutes
Fourth, Deputy Attorney General/Complainant-5 minutes

4. At the end of the proceeding, respondent/petitioner should be given the opportunity to personally address the Board. **This opportunity is given only to respondents/petitioners who have been represented by counsel and thus have not had an opportunity to personally address the Board.**
5. During closed session, the ALJ is expected to assist the Board with its deliberations.
6. The ALJ is expected to write all final decisions regarding petitions for penalty relief in a timely manner and forward the decision to the Board's Enforcement Program Manager.

Sandra Monterrubio
Veterinary Medical Board
2005 Evergreen Street, Suite 2250
Sacramento, CA 95822
(916) 263-1570

The Board's legal counsel is responsible for all other decisions.



RECEIVED

MAY 17 2012

VMB / RVTC

VETERINARY MEDICAL BOARD

CASE NO: 12-04315-VM
DATE: May 16, 2012
FINAL REPORT

SUBJECT:

Name: Lambarri, Ignacio Arnulfo
Aliases: None known
Residence Address: [REDACTED]
Residence Telephone: [REDACTED]
Description: [REDACTED]
Brown hair/Brown eyes
Date of Birth: [REDACTED]
CA Driver's License: [REDACTED]
Occupation: Veterinarian
Professional License: Unlicensed
Business Address: None
Business Telephone: None

COMPLAINT INFORMATION:

Client Case Number: NV 2012 375
Date(s) of occurrence: 01/18/2012

ADMINISTRATIVE VIOLATIONS:

Petition for Reinstatement of licensure/Background check.

SYNOPSIS OF INVESTIGATION:

A Request for Service was generated by the Veterinary Medical Board (Board) which requested the Division of Investigation (Division) to perform a background check to verify that Ignacio Lambarri has been and is obeying all laws.

The documents to follow were obtained: Copies of discipline documents, correspondence, letters of recommendation, statement from Lambarri.

Lambarri was contacted during the course of this investigation.

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The investigation revealed that Lambarri is in compliance with the discipline set forth by the Board and is petitioning for reinstatement.

This case will be sent to the Board for their review and appropriate action.

NARRATIVE:

On January 18, 2012, the Board referred to the Division a request for service for investigation concerning Lambarri.

On February 29, 2012, Investigative Analyst Susan Calders, was assigned this case for review and investigation.

On March 2, 2012, I received this case for review and investigation. In reviewing this file, I learned the following information.

In 1998, the Board conducted a routine inspection of Vista Veterinary Hospital which is run by Ignacio Lambarri, DVM. During that inspection, the Board inspectors found numerous unsanitary conditions and other violations of the Business and Professions Code. The inspector found roof leaks causing unsanitary conditions, wall and floor defects throughout the facility, numerous expired drugs in the pharmacy and work areas, fire extinguisher was non-operational, exercise runs were worn, not sanitary and did not provide for separation of animal waste from the adjacent run, the kennels were worn and not sanitary, failure to maintain a surgery log, failure to provide a complete and up to date narcotics log, failure to post written notification of no personnel on premises after hours, failure to provide a sanitary environment to avoid source and transmission of infection.

On March 27, 1999, the Board conducted a follow-up investigation of the hospital premises and the inspectors were unable to enter the facility because it was closed. The inspectors did observe through the windows that the defects in the walls and ceiling still existed.

On March 15, 2000, the Board conducted another inspection of the premises and found numerous sanitary problems in violation of the Business and Professions Codes to include failure to repair damage to the walls, ceiling and floor, inadequate emergency lighting in the surgical area, failure to maintain a complete and up-to-date surgical log, surgery room was not distant from other areas of the facility with a door for separation, failure to repair or replace kennels to make them capable of being sanitized, failure to provide a separation of animals from waste products in the exercise runs, existing conditions prevented effective sanitization throughout the facility, failure to maintain a complete and up-to-date narcotic log and failure to remove expired drugs from the active work area.

On December 22, 2000, the Board inspectors visited the premises and once again found that there were still unsanitary and below the minimum standards set by law despite having two years to bring his hospital into compliance.

An Accusation No. AV 2001 15 was filed in February of 2002 (Attachment #1).

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In May of 2002, a Stipulated Settlement and Disciplinary Order (**Attachment #2**) were issued revoking Lambarri's license and his permit to operate Vista Veterinary Hospital. The revocation of the license and permit were stayed and Lambarri was placed on probation for three years with the following terms and conditions:

1. Actual Suspension – Premise. The permit is suspended until all violations of the minimum standards for veterinary premises are corrected and an inspection is conducted to verify compliance. During a period of suspension, the premises may not be used by any party for any act constituting the practice of veterinary medicine. During the first two years of probation, the premises shall be subject to random inspections conducted by the Board's designee.
2. Obey all federal and state laws.
3. Quarterly reports and interviews.
4. Cooperation with probation surveillance.
5. No preceptorships or supervision of interns.
6. Notice to employers.
7. Notice to employees.
8. Notice to owners and officers.
9. Post notice of suspension.
10. Tolling of probation.
11. Violation of probation.
12. Completion of probation.
13. Fine.
14. Cost recovery.

In August of 2005, the Board petitioned to revoke Lambarri's probation based upon the following findings (**Attachment #3**):

On April 27, 2004, the Board conducted an inspection of Lambarri's practice. The inspection revealed numerous minimum standards violations and confirmed that an unlicensed employee was practicing veterinary medicine.

On December 2, 2004, the Board conducted a follow-up inspection of Lambarri's practice to confirm compliance and found that Lambarri continued to comply with the minimum standards requirements.

As a term of his probation, Lambarri submitted quarterly reports due in October 2003, January of 2004, April 2004 and July 2004, but failed to submit the quarterly report that was due on April 5, 2005.

In May of 2006, the Board entered into a Stipulated Settlement and Disciplinary Order (**Attachment #4**). It was ordered that Lambarri's license, hospital permit and his Mobile One permit were revoked, but the revocation was stayed and he was placed on three year's probation with the following terms and conditions:

1. Obey all laws.
2. Quarterly reports and interviews.
3. Cooperation with probation surveillance.
4. No preceptorships or supervision of interns.

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5. Notice to employers.
6. Notice to employees.
7. Notice to owners and officers.
8. Posted notice of suspension.
9. Tolling of probation.
10. Violation of probation.
11. Completion of probation.
12. Cost recovery.
13. Limitation on practice.

In July of 2009, the Board filed another Accusation and Petition to Revoke Probation against Lambarri (Attachment #5). In reviewing this accusation, I learned the following information:

On November 1, 2007, client Minoux took her ten week old puppy "Captain", a French Bulldog/Boston Terrier mix, to Lambarri's clinic for his second set of immunizations. Lambarri performed a physical examination and recorded the animal's vital signs. During the examination, Captain became agitated and acted aggressively toward Lambarri. The veterinary assistant had called in sick and the office was short staffed. Lambarri demonstrated control techniques to Minoux, who then held Captain's head while Lambarri attempted to administer the injection. The animal continued to struggle and Lambarri tried to "make him mind by repositioning him". Lambarri eventually administered the injection in Captain's hind quarters.

It is unclear if Captain collapsed immediately after receiving the injection or within a few minutes, but he ultimately did collapse. Lambarri mentioned to Minoux he "may have nicked a vein". Minoux told Lambarri, "I think he is in shock." Lambarri wrote in his chart that the animal became flaccid and his gums were white. The chart also reveals that Lambarri reacted to Captain's predicament by giving him an intramuscular injection of dexamethasone and a subcutaneous injection of dopram. Lambarri then connected Captain to an ECG monitor and began administering oxygen via a face mask. Lambarri administered atropine and more epinephrine intramuscularly.

After thirty minutes, Captain's mucous membranes were pink and he seemed to be breathing better. There is no mention in Lambarri's charting that Captain was fighting his attempts to subdue him. At 1830 hours, Lambarri discharged Captain from his care. Lambarri told Minoux to monitor the color of Captain's mucous membranes and if they changed from pink to white, to take Captain to the emergency clinic in San Marcos.

Fifteen minutes after leaving the premises, while Minoux was in the process of driving home, Captain began to vomit. Minoux telephoned Lambarri on her cellular telephone to report this information. Minoux reported that Lambarri dissuaded her from taking the animal to the emergency clinic. Lambarri charted that he asked Minoux if the animal's tongue was pink and if he was breathing, to which she replied positively to both questions. Lambarri told Minoux that if there were any changes to take him to the emergency clinic.

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The chart entries further reveal that at 1930 hours, Minoux called Lambarri again with concerns about Captain. Lambarri told Minoux again to monitor him and if he became worse, to take him to the emergency clinic. The chart reflects that at 2030 hours, that Lambarri called Minoux and was told that she had taken Captain to the emergency clinic in Carlsbad.

When Minoux arrived with Captain, the animal was in severe distress. Captain did not respond to heroic attempts to revive and stabilize him and he expired.

In July of 2010, a proposed decision was adopted and Lambarri's license and his premises permit were revoked. Lambarri was ordered to pay the Board \$7,019.50 in cost recovery (Attachment #6).

Included with the Request for Service is a certification of Lambarri's licensing history (Attachment #7).

On September 30, 2011, the Board received a package to Petition for Reinstatement or Reduction of Penalty for License No. 5564 and Veterinary Premise Permit No. 3116 from Lambarri (Attachment #8). The documents included in this package are the Petition of Reinstatement, recommendations from California veterinarians, certificates of continuing education, letters of recommendation from members of the San Diego County Veterinary Medical Association, letter of recommendation from attorney Genaro Lara, letter of recommendation from Kevin Sweeney, letter of recommendation from George DeGeare, a written statement from Lambarri and a Compliance Receipt Notification from Sandy Walsh of the Veterinary Medical Board. Lambarri's hospital was inspected and approved.

On March 14, 2012, I telephoned Allison Nagao-Dutra, client enforcement contact for the Board and requested information concerning Lambarri's cost recovery payments which totaled \$7,019.50. Nagao-Dutra told me that Lambarri has not paid any cost recovery to date.

On March 14, 2012, I check the Criminal, Civil and Domestic indexes for the County of San Diego and found there are no new filings since Lambarri had his license and premises permit revoked.

On March 20, 2011, I wrote a letter to Lambarri requesting he contact me to arrange for an interview (Attachment #9).

INTERVIEW OF IGNACIO LAMBARRI :

On March 30, 2012, I met with Lambarri in the Division of Investigation field office. I identified Lambarri by viewing his California driver's license E0973899. Lambarri gave me the following information:

Lambarri told me that it has been more than a year since he has had his license and premises permit revoked and he wants to resume his career, which he loves and gives him a great deal of satisfaction.

Lambarri reported that he believes that initially he was negligent only because he was attempting to remodel and upgrade his hospital and did not intentionally violate the regulations. He said that during the time he was on probation, one of his assistants vaccinated a puppy when he was out of town.

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Lambarri stated that the Board determined this was a violation and he was again disciplined. Lambarri told me that he has paid thousands of dollars in fines and has taken responsibility for his actions. Lambarri said that in 2007, he was working alone in his office because his assistant was ill and was examining a puppy for vaccination and de-worming. Lambarri stated that he restrained the puppy with a towel, after administering the vaccination, and trimmed his nails. Lambarri told me that this animal was diagnosed with brachycephalic syndrome which caused him to have symptoms of respiratory stridor. Lambarri said that this is common in the breed of dog, a French bulldog/Boston terrier mix and causes them high degrees of anxiety and resistance to any restraint.

Lambarri reported that the puppy was suffering from improper oxygenation when he restrained him but he stated he repositioned the puppy and extended his neck pulling his tongue forward and he was able to breathe properly. Lambarri said the puppy also demonstrated mild symptoms of anaphylaxis in reaction to the vaccine. Lambarri said he treated the puppy with oxygen via a mask.

In retrospect, Lambarri told me he should have cancelled his appointments that afternoon when his assistant called in sick rather than try to handle everything himself. Lambarri said in reviewing his actions, he realizes he should have administered an IV catheter with intravenous fluids and epinephrine. Lambarri admitted that his communications with the puppy's owner was poor and he does not blame them for reporting him to the Board.

Lambarri stated that in May of 2010, he suffered a heart attack which led to quadruple coronary bi-pass surgery. In September he also had surgery on his right shoulder to repair a ruptured rotator cuff and joint damage. These disabilities have prevented him from any employment and he has been unable to make any payments to the Board for his cost recovery. Lambarri stated that as soon as he is able to reopen his hospital, he will begin his payments.

After his surgeries, Lambarri reported that he has spent a great deal of time reflecting, studying, reading and attending continuing education courses. He has also had the opportunity to spend time with Mark Handell, DVM of Palomar Animal Hospital and to observe their methods and procedures. Lambarri told me that he believes he is not a risk to the public and sincerely wants to practice veterinary medicine of the highest caliber.

On April 27, 2012, I faxed an inquiry to the San Diego Police Department Records Division requesting a check of their records for any criminal history for Lambarri (Attachment #10).

On May 4, 2012, I received a response from the San Diego Police Department Records Division indicated they have no criminal history for Lambarri (Attachment #11).

EVIDENCE:

All items of evidence obtained by Investigative Analyst Susan Calders during the course of this investigation are listed as attachments. The originals will be sent with the report to the respective board or bureau. No copies will be maintained in the Division's San Diego Field Office.

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CASE NO.: 12-04315-VM

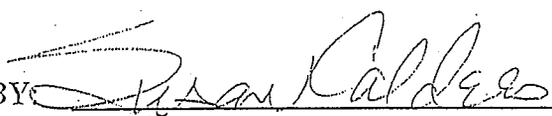
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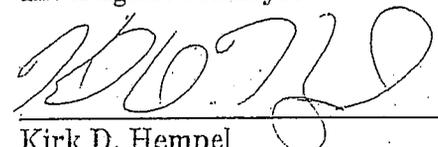
ATTACHMENTS:

1. Copy of Accusation AV 2001 15, in the matter of Ignacio A. Lambarri and Vista Veterinary Hospital.
2. Copy of Stipulated Settlement and Disciplinary Order in the matter of Ignacio A. Lambarri and Vista Veterinary Hospital.
3. Copy of Petition to Revoke Probation in the matter of Ignacio A. Lambarri.
4. Copy of Stipulated Settlement and Disciplinary Order in the matter of Ignacio A. Lambarri.
5. Copy of Accusation and Petition to Revoke Probation in the matter of Ignacio A. Lambarri.
6. Copy of Proposed Decision in the matter of Ignacio A. Lambarri.
7. Copy of certification of non-licensure for Lambarri.
8. Copies of documents submitted by Lambarri for his reinstatement.
9. Copy of letter dated March 20, 2012, to Lambarri.
10. Copy of fax dated April 27, 2012, to San Diego Police Department Records Division.
11. Copy of response from San Diego Police Department Records Division.

WITNESSES:

1. Susan Calders
Investigative Analyst
Department of Consumer Affairs
Division of Investigation
4995 Murphy Canyon Road, Suite 207
San Diego, CA 92123
(858) 637-7120
Can testify to the details of the investigation.

SUBMITTED BY:  DATE: 05-16-12
Susan Calders
Investigative Analyst

APPROVED BY:  DATE: 5/16/12
Kirk D. Hempel
Supervising Investigator I

1 7. Business and Professions Code section 4853.5 provides, "[w]hen it has been
2 adjudicated in an administrative hearing that the licensee manager has failed to keep the premises
3 and all equipment therein in a clean and sanitary condition as provided for in subdivision (h) of
4 Section 4883, or is in violation of any of the provisions of Section 4854, the board may withhold,
5 suspend, or revoke the registration of veterinary premises, or assess a fine of not less than fifty
6 dollars (\$50) nor more than five hundred dollars (\$500) per day until such violation has been
7 rectified, or by both such suspension and fine. The total amount of any fine assessed pursuant to
8 this section shall not exceed five thousand dollars (\$5,000)."

9 8. Business and Professions Code section 4853.6 provides, in part, that "[t]he
10 board shall withhold, suspend or revoke registration of veterinary premises:

11
12 (b) When the licensee manager has, under proceedings conducted in accordance
13 with Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the
14 Government Code, the license to practice veterinary medicine, surgery, and dentistry
15 revoked or suspended."

16 9. Business and Professions Code section 4914 provides, in part, that a veterinary
17 corporation shall not do or fail to do any act the doing of which or the failure to do which would
18 constitute unprofessional conduct.

19 10. Business and Professions Code section 4081, provides, in part, that: "[a]ll
20 records of manufacture and of sale, acquisition, or disposition of dangerous drugs or dangerous
21 devices shall be at all times during business hours open to inspection by authorized officers of
22 the law, and shall be preserved for at least three years from the date of making. A current
23 inventory shall be kept by every...veterinarian...who maintains a stock of dangerous drugs or
24 dangerous devices."

25 11. Under Business and Professions Code section 125.3, the Board may request
26 the administrative law judge to direct a licensee found to have committed a violation or
27 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation
28 and enforcement of the case.

FACTUAL ALLEGATIONS

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2 12. On or about November 6, 1998, the Board conducted a routine inspection of
3 respondent Vista Veterinary Hospital which is run by respondent Lambarri. During that
4 inspection, the Board inspectors found numerous unsanitary conditions and other problems at the
5 premises in violation of Business and Professions Code sections 4883(h), 4081, 4854 and Title
6 16, California Code of Regulations sections 2030, 2030.1 and 2032.3, including:

- 7 a. Roof leaks causing unsanitary conditions.
- 8 b. Wall and floor defects throughout the facility, such as exposed ceiling beams
9 and crumbling plaster.
- 10 c. Numerous expired drugs in the pharmacy and work areas.
- 11 d. Fire extinguisher non-operational.
- 12 e. Kennels with cracked and worn areas that were not sanitary.
- 13 f. Exercise runs worn, not sanitary, and did not provide for separation of animal
14 waste from adjacent run.
- 15 g. Failure to maintain a surgery log
- 16 h. Failure to provide a complete and up to date narcotics log.
- 17 i. Failure to post written notification of no personnel on premises after hours.
- 18 j. Failure to provide a sanitary environment to avoid source and transmission of
19 infection.

20 13. A report of the findings of the investigation was provided to respondent
21 Lambarri. Respondent's counsel subsequently contacted the Board and said that the problems
22 would be corrected.

23 14. On or about March 27, 1999, the Board conducted a follow-up investigation
24 of the hospital premises to see if the defects noted in the first inspection had been corrected. The
25 Board's investigators were unable to enter the facility because it was closed, but observed
26 through the windows that defects in the walls and ceiling still existed in the premises.

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1 15. On or about March 15, 2000, the Board conducted another inspection of the
2 premises, once again finding numerous sanitary problems and other problems in violation of
3 provisions of the Business and Professions Code and Title 16, California Code of Regulations,
4 including but not limited to:

- 5 a. Failure to repair damage to walls, ceiling and floor.
- 6 b. Inadequate emergency lighting in the surgical area.
- 7 c. Failure to maintain a complete and up-to-date surgery log.
- 8 d. Surgery room was not distinct from other areas of the facility with a door for
9 separation.
- 10 e. Failure to repair or replace kennels to make them capable of being sanitized.
- 11 f. Exercise runs failed to provide a separation of animals from waste products.
- 12 g. Existing conditions prevented effective sanitization throughout the facility
13 where the animals were kept.

14 16. In addition to the sanitary violations, the inspectors found violations of
15 provisions of the Business and Professions Code and Title 16, California Code of Regulations,
16 relating to dangerous drugs and controlled substances, including:

- 17 a. Failure to maintain a complete and up-to-date narcotic log recording the
18 balances of all controlled substances on hand.
- 19 b. Failure to remove expired drugs from the active work area.

20 17. On December 22, 2000, Board inspectors once again visited respondents'
21 premises and found that the premises were still unsanitary and below the minimum standards set
22 by law, despite respondents having two years to bring the premises into compliance.

23 Respondents' premises were found to be in violation of the following sections of Title 16,
24 California Code of Regulations:

- 25 a. Section 2030. Defects in walls and floor of premises had not been repaired and
26 still made facility impossible to sanitize.
- 27 b. Section 2030(d)(3). Failure to post notice of no staff on premises.
- 28 c. Section 2030(e). Failure to post a notice of the location of after hours referral

- 1 d. Section 2030(g)(1). Failure to provide a separation door to the surgery room.
- 2 e. Section 2030(f)(1). Piles of paper and clutter created a fire hazard.
- 3 f. Section 2030(f)(4). Failure to use proper protective gear (gloves).
- 4 g. Section 2030(f)(10) and 2032.4(b)(4)(5). Failure to maintain anesthetic
- 5 equipment in working order.
- 6 h. Section 2030(f)(12). Failure to provide adequate unexpired drugs and
- 7 equipment at the facility for emergencies.
- 8 i. Section 2030(d)(2). Ability to isolate contagious animals was not present.
- 9 j. Section 2032.3. Failure to provide in the patient record the results of exams,
- 10 treatment, doses and medication given.
- 11 k. Section 2030(f)(6). Failure to keep controlled substances in a secure location
- 12 and remove expired drugs from the facility.

13 FIRST CAUSE FOR DISCIPLINE

14 (Failure to Maintain a Sanitary Veterinary Hospital)

15 18. Respondents' veterinary license and veterinary hospital permit are subject to

16 discipline, as more particularly alleged in the factual allegations set forth above, in that

17 respondents violated Business and Professions Code sections 4883(c), 4883(h), 4853.5, and

18 4854, by failing to maintain the premises of the veterinary hospital in a sanitary condition in

19 conformance with the minimum standards required by the Board.

20 SECOND CAUSE FOR DISCIPLINE

21 (Violation of Regulatory Requirements for Record Keeping and Premises)

22 19. Respondents' veterinary license and veterinary hospital permit are subject to

23 discipline, as more particularly alleged in the factual allegations set forth above, in that

24 respondents violated Business and Professions Code section 4883(o), by violating Title 16,

25 California Code of Regulations, sections 2030, 2030.1 and 2032.3 with respect to record keeping

26 and maintenance of the premises of the veterinary hospital.

5. Taking such other and further action as may be deemed proper and appropriate.

DATED: 2/6/02



SUSAN M. GERANEN
Executive Officer
Veterinary Medical Board
Department of Consumer Affairs
State of California

Complainant

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EXHIBIT B

Decision and Order For Case No. AY 2001 15/AY 2005 33

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

In the Matter of the Accusation Against:

Case No. AV 2001 15

IGNACIO A. LAMBARRI
1139 South Santa Fe Avenue
Vista, California 92083

License No. 5564

and

VISTA VETERINARY HOSPITAL, INC.
1139 South Santa Fe Avenue
Vista, California 92083

Permit Number 3116

Respondents.

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 August 11, 2002

It is so ORDERED July 12, 2002

FOR THE VETERINARY MEDICAL BOARD
DEPARTMENT OF CONSUMER AFFAIRS

1 BILL LOCKYER, Attorney General
of the State of California
2 SUSAN A. RUFF, State Bar No. 115869
Deputy Attorney General
3 California Department of Justice
110 West "A" Street, Suite 1100
4 San Diego, CA 92101

5 P.O. Box 85266
San Diego, CA 92186-5266
6 Telephone: (619) 645-2077
7 Facsimile: (619) 645-2061

8 Attorneys for Complainant

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

11 In the Matter of the Accusation Against:

Case No. AV 2001 15

12 IGNACIO A. LAMBARRI
13 1139 South Sante Fe Avenue
Vista, California 92083

14 License No. 5564

15 and

16 VISTA VETERINARY HOSPITAL, INC.
17 1139 South Sante Fe Avenue
18 Vista, California 92083

19 Permit Number 3116

20 Respondents.

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STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER

22 In the interest of a prompt and speedy settlement of this matter, consistent with
23 the public interest and the responsibility of the Veterinary Medical Board of the Department of
24 Consumer Affairs, the parties hereby agree to the following Stipulated Settlement and
25 Disciplinary Order which will be submitted to the Board for approval and adoption as the final
26 disposition of the Accusation with respect to Ignacio A. Lambarr and Vista Veterinary Hospital,
27 Inc.

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PARTIES

1. Susan M. Geranen (Complainant) is the Executive Officer of the Veterinary Medical Board. She brought this action solely in her official capacity and is represented in this matter by Bill Lockyer, Attorney General of the State of California, by Susan A. Ruff, Deputy Attorney General.

2. Ignacio A. Lambarri is representing himself in this proceeding and has chosen not to exercise his right to be represented by counsel. Ignacio Lambarri is also representing Vista Veterinary Hospital, Inc. in this proceeding. (Ignacio A. Lambarri and Vista Veterinary Hospital, Inc. will hereinafter be collectively referred to as "Respondents.")

3. On or about June 28, 1974, the Veterinary Medical Board issued License No. 5564 to Ignacio A. Lambarri. The license was in full force and effect at all times relevant to the charges brought in Accusation No. AV 2001 15 and will expire on July 31, 2003, unless renewed.

4. On or about October 7, 1980, the Veterinary Medical Board issued Premise Permit Number 3116 to Vista Veterinary Hospital, Inc. The current owner and managing licensee of Vista Veterinary Hospital, Inc. is Ignacio A. Lambarri, D.V.M. On May 15, 2002, the permit will expire, if not renewed.

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JURISDICTION

5. Accusation No. AV 2001 15 was filed before the Veterinary Medical Board (Board), and is currently pending against Respondents. The Accusation and all other statutorily required documents were properly served on Respondents on February 13, 2002. Respondents timely filed their Notice of Defense contesting the Accusation. A copy of Accusation No. AV 2001 15 is attached as Exhibit A and incorporated herein by reference.

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ADVISEMENT AND WAIVERS

6. Respondents have carefully read and understand the charges and allegations in Accusation No. AV 2001 15. Respondents have also carefully read and understand the effects of this Stipulated Settlement and Disciplinary Order.

7. Respondents are fully aware of their legal rights in this matter, including

1 the right to a hearing on the charges and allegations in the Accusation; the right to be represented
2 by counsel at their own expense; the right to confront and cross-examine the witnesses against
3 them; the right to present evidence and to testify on their own behalf; the right to the issuance of
4 subpoenas to compel the attendance of witnesses and the production of documents; the right to
5 reconsideration and court review of an adverse decision; and all other rights accorded by the
6 California Administrative Procedure Act and other applicable laws.

7 8. Respondents voluntarily, knowingly, and intelligently waive and give up
8 each and every right set forth above.

9 CULPABILITY

10 9. Respondents admit the truth of each and every charge and allegation in
11 Accusation No. AV 2001 15.

12 10. Respondents agree that their license and permit are subject to discipline
13 and agree to be bound by the Board's imposition of discipline as set forth in the Disciplinary
14 Order below.

15 CONTINGENCY

16 11. This stipulation shall be subject to approval by the Veterinary Medical
17 Board. Respondents understand and agree that counsel for Complainant and the staff of the
18 Veterinary Medical Board may communicate directly with the Board regarding this stipulation
19 and settlement, without notice to or participation by Respondents. By signing the stipulation,
20 Respondents understand and agree that they may not withdraw their agreement or seek to rescind
21 the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt
22 this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall
23 be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action
24 between the parties, and the Board shall not be disqualified from further action by having
25 considered this matter.

26 12. The parties understand and agree that facsimile or other copies of this
27 Stipulated Settlement and Disciplinary Order, including the signatures thereto, shall have the
28 same force and effect as the originals.

1 shall be extended until such time as the final report is received by the Board. Respondents shall
2 make available all patient records, hospital records, books, logs, and other documents to the
3 Board, upon request.

4 4. Cooperation With Probation Surveillance. Respondents shall comply
5 with the Board's probation surveillance program.

6 5. No Preceptorships or Supervision of Interns. Respondents shall not
7 supervise a registered intern and shall not perform any of the duties of a preceptor.

8 6. Notice to Employers. Respondent Ignacio A. Lambarri shall notify all
9 present and prospective employers of the Decision in this case and the terms, conditions, and
10 restrictions imposed on Respondents by the Decision in this case. Within thirty (30) days of the
11 effective date of this Decision and within fifteen (15) days of Respondent Lambarri undertaking
12 new employment, Respondent shall cause his employer to report to the Board in writing,
13 acknowledging the employer has read the Accusation and Decision in this case and understands
14 Respondent's terms and conditions of probation.

15 7. Notice to Employees. Respondents shall, upon or before the effective date
16 of this Decision, post or circulate a notice which actually recites the offenses for which
17 Respondents have been disciplined and the terms and conditions of probation, to all veterinary
18 and animal health technician employees, and to any preceptor, intern or extern involved in their
19 veterinary practice. Within fifteen (15) days of the effective date of this Decision, Respondents
20 shall cause their employees to report to the Board in writing, acknowledging the employees have
21 read the Accusation and Decision in the case and understand Respondents' terms and conditions
22 of probation.

23 8. Owners And Officers (Corporations or Partnerships): Knowledge of
24 The Law. Respondent Vista Veterinary Hospital, Inc. shall provide, within thirty days after the
25 effective date of the Decision, signed and dated statements from the owners, officers, or any
26 owner or holder of ten percent (10%) or more of the interest in Respondent or Respondent's
27 stock, stating said individuals have read and are familiar with federal and state laws and
28 regulations governing the practice of veterinary medicine.

1 9. Posted Notice of Suspension. If suspension is ordered, Respondents shall
2 post a notice of the Board's Order of Suspension, in a place clearly visible to the public. Said
3 notice, provided by the Board, shall remain so posted during the entire period of actual
4 suspension.

5 10. Tolling of Probation. Should Respondents leave California to reside
6 or practice outside this State, Respondents must notify the Board in writing of the dates of
7 departure and return. Periods of residency or practice outside the State shall not apply to
8 reduction of the probationary terms.

9 11. Violation of Probation. If either or both of the Respondents violate
10 probation in any respect, the Board, after giving Respondents notice and the opportunity to be
11 heard, may revoke probation and carry out the disciplinary order that was stayed. If an accusation
12 or petition to revoke probation is filed against either or both Respondents during probation, or if
13 the Attorney General's office has been requested to prepare any disciplinary action against
14 Respondents' license or permit, the Board shall have continuing jurisdiction until the matter is
15 final, and the period of probation shall be extended until the matter is final.

16 12. Completion of Probation. Upon successful completion of probation,
17 Respondents' license and permit will be fully restored.

18 13. Fine. Respondents shall pay to the Board a fine in the amount of
19 \$1,000.00 pursuant to Business and Professions Code sections 4875 and 4883. Respondents shall
20 make said payments as follows: \$500.00 within sixty (60) days of the effective date of this
21 Decision and \$500.00 within one hundred twenty (120) days of the effective date of this
22 Decision.

23 14. Cost Recovery. Respondents shall pay to the Board its cost of
24 investigation and prosecution in the amount of \$1955.25. Respondents shall make said payments
25 as follows: \$200.00 per month on the first day of each month after the effective date of the
26 decision until the full amount is paid.

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ACCEPTANCE

1
2 I have carefully read the Stipulated Settlement and Disciplinary Order. I
3 understand the stipulation and the effect it will have on my license and the premise permit for
4 Vista Veterinary Hospital, Inc. On behalf of Vista Veterinary Hospital, Inc. and myself, I enter
5 into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently,
6 and agree to be bound by the Decision and Order of the Veterinary Medical Board.

7 DATED: 5-14-02

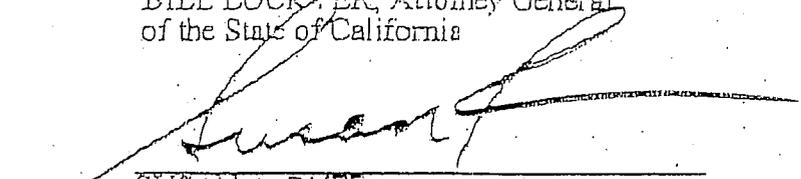
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9 
10 IGNACIO A. LAMBARRI
11 Respondent and managing licensee of
12 VISTA VETERINARY HOSPITAL, INC.

ENDORSEMENT

13
14 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
15 submitted for consideration by the Veterinary Medical Board of the Department of Consumer
16 Affairs.

17
18 DATED: 5/29/02

19
20 BILL LOCKYER, Attorney General
of the State of California

21 
22 SUSAN A. RUFF
23 Deputy Attorney General

24 Attorneys for Complainant

25
26 DOJ Docket Number: 03593110-SD2001AD0148
27 Stipulation 8/31/01
28

1 BILL LOCKYER, Attorney General
of the State of California
2 RICHARD GARSKE, State Bar No. 50569
Supervising Deputy Attorney General

3 Attorneys for Complainant
4 California Department of Justice
110 West "A" Street, Suite 1100
5 San Diego, CA 92101

6 P.O. Box 85266
San Diego, CA 92186-5266
7 Telephone: (619) 645-2610
Facsimile: (619) 645-2061

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

12 In the Matter of the Petition to Revoke Probation
Against:

13 IGNACIO A. LAMBARRI, D.V.M.
14 1139 South Santa Fe Avenue
Vista, CA 92083

15 Veterinary License No. 5564

16 and

17 VISTA VETERINARY HOSPITAL, INC.

18 + ONE MOBILE
1139 South Santa Fe Avenue
19 Vista, CA 92083

20 Permit No. 3116

21 Respondents.

Case No. AV 2001 15

PETITION TO REVOKE
PROBATION

22
23 Complainant alleges:

24 PARTIES

25 1. Susan M. Geranen (Complainant) brings this Petition to Revoke
26 Probation solely in her official capacity as the Executive Officer of the Veterinary Medical
27 Board, Department of Consumer Affairs, State of California.

28 ///

1 7. This Petition to Revoke Probation is also brought before the Board under
2 the authority of the Board's decision in AV 2001 15, which provides, in pertinent part, as
3 follows:

4 "IT IS HEREBY ORDERED that License No. 5564 issued to Respondent Ignacio
5 A. Lambarri and Permit No. 3116 issued to Vista Veterinary Hospital, Inc. are revoked.
6 However, the revocation of the license and permit is stayed and Respondents are placed on
7 probation for three (3) years on the following terms and conditions."

8 ". . . .
9 "2. Obey All Laws. Respondents shall obey all federal and state laws and
10 regulations substantially related to the practice of veterinary medicine.

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

19 CHARGES AND ALLEGATIONS

20 FIRST CAUSE TO REVOKE PROBATION

21 (Failure to Obey All Laws)

22 8. At all times after the effective date of Respondents' probation, Condition 2
23 required respondents to comply with all federal and state laws and regulations substantially
24 related to the practice of veterinary medicine.

25 9. Respondents' probation is subject to revocation because they failed to
26 comply with Probation Condition 2, referenced above. The facts and circumstances regarding
27 this violation are as follows:

28 ///

1 a. On April 27, 2004, as part of probation, the Board conducted an inspection of
2 Dr. Lambarri's practice. The inspection revealed numerous minimum standards violations and
3 confirmed that an unlicensed employee was practicing veterinary medicine.

4 b. On December 2, 2004, as part of probation, the Board conducted a follow-up
5 inspection to confirm compliance. The inspection revealed that Dr. Lambarri failed to comply
6 with the minimum standards requirements.

7 SECOND CAUSE TO REVOKE PROBATION

8 (Failure to File Quarterly Reports)

9 10. At all times after the effective date of Respondents' probation, Condition 3
10 required respondent to file quarterly reports with the Board.

11 11. Respondents' probation is subject to revocation because he failed to
12 comply with Probation Condition 3, referenced above. The facts and circumstances regarding
13 this violation are as follows:

14 a. Respondent submitted quarterly reports due in October 2003, January
15 2004, April 2004, and July 2004, up to nine months late, on July 9, 2004. Respondent has not
16 submitted the quarterly report that was due on April 5, 2005.

17 DISCIPLINE CONSIDERATIONS

18 12. To determine the degree of discipline, if any, to be imposed on
19 Respondent, Complainant alleges that on or about February 6, 2002, in a prior disciplinary action
20 entitled In the Matter of the Accusation Against Ignacio Lambarri before the Veterinary Medical
21 Board, in Case No. AV 2001 15, Respondents' license and permit were disciplined for numerous
22 sanitary problems and other problems such as defects of the premises, in violation of the
23 Business and Professions Code and Title 16, California Code of Regulations.

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PRAAYER

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 the probation that was granted by the Veterinary Medical Board in Case No. AV 2001 15 and imposing the disciplinary order that was stayed thereby revoking Veterinary License No. 5564 issued to Ignacio Lambarri;

2. Revoking the probation that was granted by the Veterinary Medical Board in Case No. AV 2001 15 and imposing the disciplinary order that was stayed thereby revoking Premise Permit No. 3116 issued to Vista Veterinary Hospital, Inc.

3. Taking such other and further action as deemed necessary and proper.

DATED: 8/10/05



SUSAN M. GERANEN
Veterinary Medical Board
Department of Consumer Affairs
State of California
Complainant

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1 BILL LOCKYER, Attorney General
of the State of California
2 RON ESPINOZA, State Bar No. 176908
Deputy Attorney General
3 California Department of Justice
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6 Telephone: (619) 645-2100
Facsimile: (619) 645-2061
7 E-mail: ron.espinoza@doj.ca.gov

8 Attorneys for Complainant

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

12 In the Matter of the Petition to Revoke Probation
Against:

13 IGNACIO A. LAMBARRI, D.V.M.
14 1139 South Santa Fe Avenue
Vista, CA 92083

15 Veterinary License No. 5564

16 and

17 VISTA VETERINARY HOSPITAL, INC.
18 + ONE MOBILE
19 1139 South Santa Fe Avenue
Vista, CA 92083

20 Permit No. 3116

21 Respondents.

Case No. AV 2001 15 / AV 2005 33

OAH No. L-2005120794

STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER

22
23 In the interest of a prompt and speedy settlement of this matter, consistent with the
24 public interest and the responsibility of the Veterinary Medical Board of the Department of
25 Consumer Affairs, the parties hereby agree to the following Stipulated Settlement and
26 Disciplinary Order which will be submitted to the Board for approval and adoption as the final
27 disposition of the Petition to Revoke Probation solely with respect to Ignacio A. Lambarri,
28 D.V.M., and Vista Veterinary Hospital, Inc.+ One Mobile.

1 Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same
2 force and effect as the originals.

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

6 DISCIPLINARY ORDER

7 IT IS HEREBY ORDERED that Veterinary License No. 5564 issued to
8 Respondent Ignacio A. Lambarri, D.V.M. and Permit No. 3116 issued to Vista Veterinary
9 Hospital, Inc. + One Mobile are revoked. However, the revocation of the license and permit are
10 stayed, and Respondents are placed on probation for three (3) years on the following terms and
11 conditions.

12 1. Obey All Laws. Respondents shall obey all federal and state laws and
13 regulations substantially related to the practice of veterinary medicine.

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

22 3. Cooperation With Probation Surveillance. Respondents shall comply
23 with the Board's probation surveillance program.

24 4. No Preceptorships or Supervision of Interns. Respondents shall not
25 supervise a registered intern and shall not perform any of the duties of a preceptor.

26 5. Notice to Employers. Respondent Ignacio A. Lambarri, D.V.M., shall
27 notify all present and prospective employers of the Decision in this case and the terms,
28 conditions, and restrictions imposed on Respondents by the Decision in this case. Within thirty

1 (30) days of the effective date of this Decision and within fifteen (15) days of Respondent
2 Ignacio A. Lambarri, D.V.M., undertaking new employment, Respondent Lambarri shall cause
3 his employer to report to the Board in writing, acknowledging the employer has read the
4 Accusation and Decision in this case and understands Respondent's terms and conditions of
5 probation. Relief veterinarians notify employers immediately.

6 6. Notice to Employees. Respondents shall, upon or before the effective
7 date of this Decision, post or circulate a notice which actually recites the offenses for which
8 Respondents have been disciplined and the terms and conditions of probation, to all veterinary
9 and animal health technician employees, and to any preceptor, intern or extern involved in their
10 veterinary practice. Within fifteen (15) days of the effective date of this Decision, Respondents
11 shall cause their employees to report to the Board in writing, acknowledging the employees have
12 read the Accusation and Decision in the case and understand Respondents' terms and conditions
13 of probation. Relief veterinarians notify employees immediately.

14 7. Owners And Officers (Corporations or Partnerships): Knowledge of
15 The Law. Respondent Vista Veterinary Hospital, Inc. + One Mobile shall provide, within thirty
16 (30) days after the effective date of the Decision, signed and dated statements from the owners,
17 officers, or any owner or holder of ten percent (10%) or more of the interest in Respondent or
18 Respondent's stock, stating said individuals have read and are familiar with federal and state laws
19 and regulations governing the practice of veterinary medicine.

20 8. Posted Notice of Suspension. If suspension is ordered, Respondents shall
21 post a notice of the Board's Order of Suspension, in a place clearly visible to the public. Said
22 notice, provided by the Board, shall remain so posted during the entire period of actual
23 suspension.

24 9. Tolling of Probation. If Respondents reside out of state upon effective
25 date of the decision, they must comply with the following conditions only: quarterly reports and
26 interviews, tolling of probation, continuing education and cost recovery. If Respondents return to
27 California they must comply or be subject to all probationary conditions for the period of
28 probation.

1 Respondents, during probation, shall engage in the practice of Veterinary
2 Medicine in California for a minimum of 24 hours per week for six (6) consecutive months or as
3 determined by the Board. Should Respondents fail to engage in the practice of Veterinary
4 Medicine in California as set forth above, the time outside of the practice shall not apply to
5 reduction of the probationary terms.

6 10. Violation of Probation. If Respondents violate probation in any respect,
7 the Board, after giving Respondents notice and the opportunity to be heard, may revoke
8 probation and carry out the disciplinary order that was stayed. If an accusation or petition to
9 revoke probation is filed against Respondents during probation, or if the Attorney General's
10 office has been requested to prepare any disciplinary action against Respondents' license or
11 permit, the Board shall have continuing jurisdiction until the matter is final, and the period of
12 probation shall be extended until the matter is final.

13 11. Completion of Probation. Upon successful completion of probation,
14 Respondents' license and permit will be fully restored.

15 12. Cost Recovery. Within thirty (30) days of the effective date of this
16 decision, Respondents shall pay to the Board its costs of investigation and prosecution in this
17 matter in the amount of \$4,481.00, or Respondents shall make said payment as follows: a
18 minimum of \$149.36 per month to the Board by the fifth day of each month after the effective
19 date of the decision until the full amount is paid. However, payment in full of the \$4,481.00 to
20 the Board must be completed six (6) months before expiration of Respondents' three-year
21 probation specified herein. Failure to pay this amount to the Board shall result in automatic
22 revocation of Respondents' license and permit forthwith, without further notice or an
23 opportunity to be heard.

24 13. Limitation on Practice.

25 (A) During probation, Respondents are prohibited from the following:

26 1. Practicing veterinary medicine from a location or mobile veterinary
27 practice which does not have a current premises permit issued by the Board; and

28 2. If Respondents are the Owner or Managing Licensee of a veterinary practice,

1 the following probationary conditions apply:

2 a) The location or mobile veterinary practice must not only have a current
3 Premises Permit issued by the Board, but must also be subject to inspections by a Board
4 representative to determine whether the location or veterinary practice meets minimum standards
5 for a veterinary practice. The inspections will be conducted on an announced or unannounced
6 basis and shall be held during normal business hours. The Board reserves the right to conduct
7 these inspections on at least a quarterly basis during probation. Respondents shall pay the Board
8 for the cost of each inspection, which is \$250. If the veterinary practice has two consecutive
9 failed inspections, Respondents shall surrender the Premises Permit within ninety (90) days from
10 the date of the second consecutive failed inspection.

11 b) As a condition precedent to any Premises Permit issued to Respondents as
12 Owner or Managing Licensee, the location or mobile veterinary practice for which application is
13 made shall be inspected by a Board representative to determine whether the location or mobile
14 veterinary practice meets minimum standards for a veterinary practice. Respondents shall submit
15 to the Board, along with any Premises Permit application, a \$250 inspection fee.

16
17 ACCEPTANCE

18 I have carefully read the Stipulated Settlement and Disciplinary Order. I
19 understand the stipulation and the effect it will have on my Veterinary License and the premises
20 permit for Vista Veterinary Hospital, Inc. + One Mobile. On behalf of Vista Veterinary Hospital,
21 Inc. + One Mobile and myself, I enter into this Stipulated Settlement and Disciplinary Order
22 voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the
23 Veterinary Medical Board.

24 DATED: WEDNESDAY, MAY 17, 2006

25
26 
27 IGNACIO A. LAMBARRI, D.V.M.
28 Respondent and managing licensee of
Vista Veterinary Hospital, Inc. + One Mobile

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

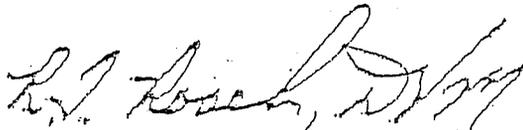
In the Matter of the Petition to Revoke) Case No. AV 2005 33/AV 2001 15
Probation Against:)
)
IGNACIO A. LAMBARRI, D.V.M.)
1139 South Santa Fe Avenue) OAH No. L-2005120794
Vista, California 92083)
)
Veterinary License No. 5564)
)
And) STIPULATED SETTLEMENT AND
) DISCIPLINARY ORDER
)
VISTA VETERINARY HOSPITAL, INC.)
+ ONE MOBILE)
JUAN CASILLAS, MANAGING LICENSEE)
1139 South Santa Fe Avenue)
Vista, California 92083)
)
Premise Permit No. HSP 3116)
)
)
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 the above-entitled
matter.

This Decision shall become effective on September 15, 2006.

IT IS SO ORDERED July 19, 2006.



R. Troy Roach, D.V.M., President
FOR THE VETERINARY MEDICAL BOARD (VMB)
DEPARTMENT OF CONSUMER AFFAIRS

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 JAMES M. LEDAKIS
Supervising Deputy Attorney General
3 RON ESPINOZA, State Bar No. 176908
Deputy Attorney General
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6 P.O. Box 85266
San Diego, CA 92186-5266
Telephone: (619) 645-2100
7 Facsimile: (619) 645-2061
8 Attorneys for Complainant

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

12 In the Matter of the Accusation and
Petition to Revoke Probation Against:

13 IGNACIO A. LAMBARRI, D.V.M.
14 1139 South Santa Fe Avenue
Vista, CA 92083

15 Veterinary License No. 5564

16 and

17 VISTA VETERINARY HOSPITAL, INC.
18 + ONE MOBILE
1139 South Santa Fe Avenue
19 Vista, CA 92083

20 Veterinary Premise Permit No. 3116

21 Respondents.
22

Case No. AV 2009 4

ACCUSATION AND PETITION TO
REVOKE PROBATION

23 Complainant alleges:

24 PARTIES

25 1. Susan M. Geranen ("Complainant") brings this Accusation and Petition to
26 Revoke Probation solely in her official capacity as the Executive Officer of the Veterinary Medical
27 Board, Department of Consumer Affairs, State of California.

28 ///

1 the authority of the following laws. All section references are to the Business and Professions
2 Code ("Code") unless otherwise indicated.

3 7. Section 4875 of the Code provides, in pertinent part, that the Board of
4 Veterinary Medicine may revoke or suspend the license of any person to practice veterinary
5 medicine, or any branch thereof, in this state for any causes provided in the Veterinary Medicine
6 Practice Act (Bus. & Prof. Code, § 4800, et seq.). In addition, the Board has the authority to
7 assess a fine not in excess of \$5,000 against a licensee for any of the causes specified in section
8 4883 of that code. Such fine may be assessed in lieu of, or in addition to, a suspension or
9 revocation.

10 8. Section 4853.6 of the Code provides, in pertinent part, that the Board shall
11 withhold, suspend or revoke registration of veterinary premises when the license of the licensee
12 manager to practice veterinary medicine is revoked or suspended.

13 9. Section 4883 of the Code states:

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

16 ".....
17 "(i) Fraud, deception, negligence, or incompetence in the practice of veterinary
18 medicine.

19 ".....
20 "(o) Violation, or the assisting or abetting violation, of any regulations adopted by
21 the board pursuant to this chapter [the Veterinary Medicine Practice Act]."

22 10. California Code of Regulations, title 16, section 2032, states:

23 "The delivery of veterinary care shall be provided in a competent and humane
24 manner. All aspects of veterinary medicine shall be performed in a manner consistent with current
25 veterinary medical practice in this state."

26 COST RECOVERY

27 11. Section 125.3 of the Code provides, in pertinent part, that a Board may
28 request the administrative law judge to direct a licensee found to have committed a violation or

1 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation
2 and enforcement of the case.

3 ACCUSATION

4 CAUSE FOR DISCIPLINE

5 (Negligence)

6 12. Respondents are subject to disciplinary action under Code section 4883,
7 subdivision (i), for negligence in the practice of veterinary medicine, in regard to the care and
8 treatment of a 10-week old puppy, "Captain." The circumstances are as follows:

9 A. On or about November 1, 2007, V.H. Minoux took her puppy "Captain" to
10 Respondents for routine vaccinations. After the puppy's nails were clipped, it went into
11 anaphylactic shock. While attempting to treat the puppy, Respondents committed the following
12 negligent acts: 1) administered an injection of epinephrine intramuscularly rather than
13 intravenously; 2) failed to place an intravenous catheter and start fluid therapy for vascular
14 support; 3) administered steroid (dexamethasone) intravenously and without prior fluid therapy;
15 and 4) failed to provide or recommend further continuous veterinary monitoring of the animal
16 after it left Respondents' clinic.

17
18 PETITION TO REVOKE PROBATION

19 13. Complainant incorporates by reference as if fully set forth herein the
20 allegations contained in paragraphs 1 through 12 above.

21 14. The Petition to Revoke Probation herein is also brought before the
22 Veterinary Medical Board under the authority of the Board's decision in Case No. AV 2001
23 15/AV 2005 33, which provides, in pertinent part, as follows:

24 "IT IS HEREBY ORDERED that License No. 5564 issued to Respondent Ignacio
25 A. Lambarri and Permit No. 3116 issued to Vista Veterinary Hospital, Inc. are revoked.
26 However, the revocation of the license and permit is stayed and Respondents are placed on
27 probation for three (3) years on the following terms and conditions."
28

1 Lambarri, D.V.M., and Vista Veterinary Hospital, Inc., + One Mobile," Case No. AV 2001
2 15/AV 2005-33, effective September 15, 2006, Respondents' license and premises permit were
3 disciplined for violating certain terms and conditions of their probation.

4 PRAYER

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

7 1. Revoking or suspending Veterinary License No. 5564 issued to Ignacio A.
8 Lambarri, D.V.M., and Veterinary Premises Permit No. 3116 issued to Vista Veterinary
9 Hospital, Inc. + One Mobile;

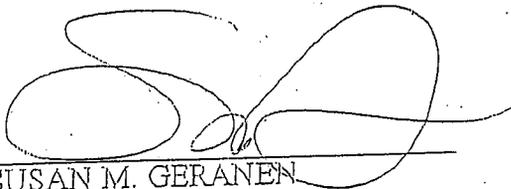
10 2. Assessing a fine against Ignacio A. Lambarri, D.V.M., and Vista
11 Veterinary Hospital, Inc. + One Mobile not in excess of \$5,000 for any of the causes specified in
12 Business and Professions Code section 4883;

13 3. Ordering Ignacio A. Lambarri, D.V.M., and Vista Veterinary
14 Hospital, Inc. + One Mobile to pay the Veterinary Medical Board the reasonable costs of the
15 investigation and enforcement of this case, pursuant to Business and Professions Code
16 section 125.3;

17 4. Revoking the probation that was granted by the Veterinary Medical Board
18 in Case No. AV 2001 15/AV 2005 33 and imposing the disciplinary order that was stayed thereby
19 revoking Veterinary License No. 5564 issued to Ignacio A. Lambarri, D.V.M., and Permit No.
20 3116 issued to Vista Veterinary Hospital, Inc. + One Mobile; and

21 5. Taking such other and further action as deemed necessary and proper.

22 DATED: 7/29/09



23
24 SUSAN M. GERANEN
25 Executive Officer
26 Veterinary Medical Board
27 Department of Consumer Affairs
28 State of California
Complainant

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EXHIBIT A

Decision and Order For Case No. AV 2001 15

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

In the Matter of the Accusation and Petition to Revoke Probation Against: Case No. AV 2009 4

IGNACIO A. LAMBARRI, D.V.M.
1139 South Santa Fe Avenue
Vista, CA 92083

OAH No. 2009110202

Veterinary License No. 5564

and

VISTA VETERINARY HOSPITAL, INC.
+ ONE MOBILE
1139 South Santa Fe Avenue
Vista, CA 92083

Veterinary Premise Permit No. 3116,

Respondents.

PROPOSED DECISION

This matter came on regularly for hearing before Roy W. Hewitt, Administrative Law Judge (ALJ), Office of Administrative Hearings, at San Diego, California on May 4, 2010.

Deputy Attorney General Ron Espinoza represented complainant.

Ignacio A. Lambarri, D.V.M. (respondent) and respondent Vista Veterinary Hospital, Inc., + One Mobile (premises) were represented by George Wallace, Esq.

Oral and documentary evidence was received and the record remained open until May 17, 2010 so that the parties could submit written closing statements. The written closing statements were received and the matter was deemed submitted on May 17, 2010.

FACTUAL FINDINGS

1. The Accusation and Petition to Revoke Probation against respondent and premises was filed by Susan M. Geranen (complainant), while acting in her official capacity as the Executive Officer of the Veterinary Medical Board, Department of Consumer Affairs, State of California (the board).

2. On June 28, 1974, the board issued Veterinary License No. 5564 to respondent. Respondent's license was on probationary status at all times relevant to the allegations contained in the Accusation and Petition to Revoke Probation.

3. On October 7, 1980, the board issued Veterinary Premise Permit No. 3116 to the premises, with respondent listed as the managing licensee. The premise's permit was on probationary status at all times relevant to the allegations contained in the Accusation and Petition to Revoke Probation.

Disciplinary History

4. Effective August 11, 2002, respondent's license and the premise's permit were revoked. The revocations were stayed and the license and permit were placed on probation for a period of three (3) years on certain terms and conditions.

5. Effective September 15, 2006, respondent's license and the premise's permit were again revoked. The revocations were again stayed and the license and permit were placed on probation for a period of three (3) years on certain terms and conditions, including the following:

Condition 2 – "Respondents shall obey all federal and state laws and regulations substantially related to the practice of veterinary medicine."

Condition 10 – "If respondents violate probation in any respect, the board, after giving respondents notice and the opportunity to be heard, may revoke probation and carry out the disciplinary order that was stayed. If an accusation or petition to revoke probation is filed against respondents during probation, or if the Attorney General's office has been requested to prepare any disciplinary action against respondents' license or permit, the board shall have continuing jurisdiction until the matter is final, and the period of probation shall be extended until the matter is final."

6. On November 1, 2007 at approximately 4:00 p.m., Virginia M. took her son's ten-week-old puppy "Captain," a French Bulldog/Boston Terrier mix, to respondent's clinic, the premises, for his "second set of puppy shots." Respondent performed a physical examination and recorded Captain's vital signs. During the physical examination, Captain became agitated and acted aggressively toward respondent. Respondent's assistant at the

clinic had called in sick so respondent was short staffed: Only respondent and his wife, who worked as the receptionist, were staffing the clinic that day. Consequently, respondent demonstrated control techniques to Virginia M. who then held Captain's head while respondent gave Captain a shot. Captain began to struggle and respondent tried to "make him mind by repositioning him." Eventually, respondent gave Captain a shot in Captain's "hind quarters." It is unclear from the evidence if Captain "collapsed" immediately after receiving the shot or whether, based on Virginia M.'s request, respondent then clipped Captain's "nails." In any event, whether immediately after getting the shot or after the "nail" clipping, Captain "collapsed."

When Captain collapsed, respondent mentioned that he may have "nicked a vein." Virginia M. told respondent "I think he's in shock." Although Virginia M. was not trained in Veterinary medicine, she was correct: Captain reacted to the combination of the shot and the stressful environment by going into anaphylactic shock. Respondent, on the other hand, did not seem to immediately recognize and appreciate the severity of Captain's situation.

7. Respondent noted in his chart entry that Captain became flaccid and his gums were white.¹ The chart entries also reveal that respondent reacted to Captain's predicament by giving him an intramuscular (IM) injection of dexamethasone and a subcutaneous (SC) injection of dopram.² Respondent connected an ECG to Captain and began administering oxygen via a face mask. Respondent administered atropine and more epinephrine (IM). After 30 minutes, Captain's mucous membranes were pink and Captain seemed to be breathing better. There is no mention in the chart that Captain was fighting respondent's attempts to care for him "like a wild animal." At approximately 6:30 p.m., respondent discharged Captain from his care. Respondent told Virginia M. and her son to monitor the color of Captain's mucous membranes and if they changed from pink to white Captain should be taken to the emergency clinic in San Marcos.

8. Approximately 15 minutes after leaving the premises, while Virginia M. and her son were in the process of driving home with Captain, Captain began vomiting so

¹ In addition to the chart entries respondent has since provided the board with written statements concerning the Captain incident and his testimony during the instant hearing. The chart entries, respondent's written statements and his testimony all differ in significant respects; consequently, respondent's chart entries are credited over his subsequent, self-serving, differing, explanations of what occurred.

² This is not what respondent says happened in his written explanation to the board, dated April 25, 2008. In that statement, respondent asserted that he attempted an intravenous (IV) injection of epinephrine in the jugular vein, and then he administered dopram and dexamethasone by the same route. During the instant hearing, respondent testified that when Captain "passed out" respondent "immediately grabbed epinephrine" and tried to give it to Captain via IV injection sublingually, in the tongue. However, Captain fought like a wild animal and the injection ended up in the muscle of Captain's tongue. Again, respondent's most recent accounts of the incident are not credible. For example, it appears from respondent's testimony that after the "puppy shot" and "nail trim" Captain "passed out." However, respondent then testified that the passed out Captain fought vigorously as respondent attempted to inject epinephrine into his tongue. It is inconceivable that Captain would have gone from passed out to fighting vigorously in advance of the epinephrine injection. In fact, it seems from Virginia M.'s testimony and Captain's medical chart that Captain remained in a shocked condition from the time he collapsed until he was sent home with his owner.

Virginia M. called respondent on her cellular telephone. Virginia M. testified that respondent dissuaded her from taking Captain to the emergency clinic; however, respondent testified that he directed Virginia M. to immediately take Captain to the emergency clinic for treatment and monitoring. Respondent testified that Virginia M. acted in "complete disregard of my advice" by taking Captain home. Once again, respondent's chart entries belie his testimony. In Captain's chart, respondent noted the following: "6:30 After Mrs. Minoux left hospital they called from home stated puppy vomited and poss inhaled in resp track-saliva or pink fluid-I asked if tongue was pink o/ says yes, breathing OK o/said yes, I told o if any changes go to emergy cl." The chart entries further reveal that at 7:30 p.m., Virginia M. called respondent again due to her concerns. Respondent again told her to monitor Captain's tongue color and breathing and if either his color or breathing got worse to take him to the emergency clinic. The chart then reveals that at 8:30 p.m. respondent called Virginia M. at home and was informed that Virginia M. and her son had taken Captain to the emergency clinic in Carlsbad.

9. Virginia M. and her son took Captain to the California Veterinary Specialists emergency care facility located in Carlsbad where Captain presented in "severe distress." Unfortunately, Captain failed to respond to heroic attempts to revive and stabilize him. "CPR is discontinued and puppy dies."

10. Respondent admitted during his testimony that it would have been negligent of him not to advise Virginia M. and her son to "immediately go to the emergency clinic" after Captain had vomited; which, according to his own records he failed to do. Further, expert evaluation of respondent's acts concerning his care and treatment of Captain revealed the following deviations from the standard of care: Respondent acted negligently by failing to place an IV catheter and initiate fluid therapy for vascular support when Captain collapsed and exhibited pale mucous membrane color and localized signs (hives and swelling); respondent acted negligently by administering an intramuscular injection of epinephrine as opposed to administering it IV;³ respondent acted negligent by administering dexamethasone (a steroid) into Captain's jugular vein; and, respondent acted negligently by releasing Captain to go home and be monitored by Virginia M. and her son - standard of care required that Captain be monitored by a medical professional for 24 to 48 hours.

11. The costs of the investigation and enforcement of this matter total \$7,019.50.

LEGAL CONCLUSIONS

1. Cause for discipline exists pursuant to California Business and Professions Code section 4883, subdivision (i) because, the facts set forth in Findings 6 through 10, establish that respondent committed repeated negligent acts in the practice of veterinary medicine.

³ In fact, respondent's testimony reveals that he actually introduced the epinephrine partially-IV, partially sublingually, but mainly IM as he "struggled with Captain," who by all recorded records was unconscious, in his attempts to inject epinephrine IV under Captain's tongue.

2. Cause for discipline of the premise permit exists pursuant to Legal Conclusion 1 because, as set forth in 4853.6: "the board shall withhold, suspend or revoke registration of veterinary premises when the license of the licensee manager to practice veterinary medicine is revoked or suspended."

3. Cause to revoke probation exists pursuant to Legal Conclusion 1 because respondent violated condition 2 of his probation, which required him to comply with all federal and state laws and regulations substantially related to the practice of veterinary medicine.

4. This is the third time respondent has been before the board in a disciplinary matter. As previously noted in Findings 4 and 5, respondent's license and the premise permit were revoked. The revocations were stayed and the license and permit were placed on probation for a period of three (3) years on certain terms and conditions. Subsequently, effective September 15, 2006, respondent's license and the premise permit were again revoked. The revocations were again stayed and the license and permit were placed on probation for a period of three (3) years on certain terms and conditions. Now, in this third action, respondent, after only one year into his most recent three-year probationary period, has committed numerous negligent acts during his care and treatment of Captain, a ten-week-old puppy. Given respondent's disciplinary history, revocation of his license and the premise permit is necessary for public protection.

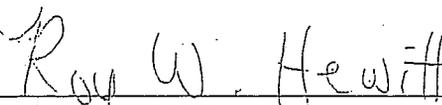
5. The costs of the investigation and enforcement of this matter, recoverable by the board pursuant to Business and Professions Code section 125.3, total \$7,019.50.

ORDER

WHEREFORE, THE FOLLOWING ORDER is hereby made:

1. Respondent's probation is revoked and respondent's Veterinary License No. 5564 and his Veterinary Premise Permit No. 3116 are revoked.
2. Respondent shall pay the board \$7,019.50 as cost recovery.

DATED: June 8, 2010



ROY W. HEWITT
Administrative Law Judge
Office of Administrative Hearings



January 19, 2012

To Whom It May Concern:

I HEREBY CERTIFY that I am the Executive Officer of the California State Veterinary Medical Board and the official custodian of the records of the California State Veterinary Medical Board.

Further, I hereby certify that the records of the California State Veterinary Medical Board show that **Ignacio Lambarri, DVM** does not hold a Veterinary Medical License or a Registered Veterinary Technician Certificate in the state of California.

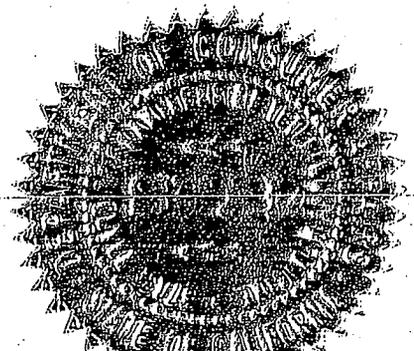
Further, I hereby certify that the records of the California State Veterinary Medical Board show that **Ignacio Lambarri, DVM** has held license No. 5564, to practice veterinary medicine as a Veterinarian or a Registered Veterinary Technician in the state of California. Said License is revoked.

Further, I hereby certify that the records of the California State Veterinary Medical Board show that on August 11, 2005, administrative case number AV 2001 15/AV 2005 33 was filed at the Attorney General's office. The case resulted in the revocation stayed of Dr. Lambarri's license and premise permit which resulted in three years of probation.

Further, I hereby certify that the records of the California State Veterinary Medical Board show that on July 29, 2009, administrative case number AV 2009 4 was filed at the Attorney General's office. The case resulted in the revocation of Dr. Lambarri's California Veterinary License No. 5564 and Premise Permit No. 3116.

Witness My Hand and Seal of the California State Veterinary Medical Board this 19th day of January 2012.

SUSAN M. GERANEN
EXECUTIVE OFFICER



Ignacio Lambarri, D.V.M.
P.O. Box 638
Bonsall, CA. 92003

Veterinary Medical Board.
2005 Evergreen St., Suite 2250
Sacramento CA. 92815

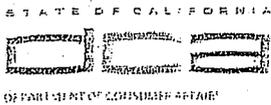
September 28, 2011

CONTENTS:

Package to Petition for Reinstatement or Reduction of Penalty for License No. 5564 and
Veterinary Premise Permit No. 3116.

Total Pages: 36

Page	1	D.C.A. Form Petition for Reinstatement.	
	2	Criminal Actions and Rehabilitation Sheet.	
	3	Same as Above (separate sheet).	
	4	Licensed California Veterinarians Recommendations.	
	5-6	Letter from Dr. Mark Handell and notary sheet.	
	7-8	Letter from Dr. Michael A. McCoy and notary sheet.	
	9-10	Letter from Dr. Janet Moston and notary sheet.	
	11-13	Background letter from Dr. Janet Moston for more information and confirmation of her signature.	
	14	Certificate from International Veterinary Seminars.	16 Hrs.
	15	CE Certificate S.D.C.V.M.A. Update Specialist Seminar	6
	16	CE Certificate S.D.C.V.M.A. Ophthalmology Seminar	12
	17	CE Certificate California Veterinary Specialist Med. and Surg.	1.5
	18	CE of Attendance Pacific Veterinary Conference Anaheim CA.	24
	19	CE of Attendance Veterinary Imaging Center, San Diego, CA.	2
	20	CE List sheet of continuing education efforts and cost.	
	21-23	Letter as a written petition and activities since action against my Veterinary License.	
	24	Letter from Director of the S.D.C.V.M.A. Ms. Pauline White in regards of membership length.	
	25	Letter from Dr. Miguel Espinoza S.D.C.V.M.A. Membership Chairman in regards life membership with all privileges.	
	26-28	Background letter from Commander United States Navy, Rev. Kevin J. Sweeney and notary sheet.	
	29-31	Petition to the Veterinary Medical Board from Commander United States Navy, Camp Pendleton U.S. Marine Corps, Rev. Kevin J. Sweeney and notary sheet.	
	32-34	Letter of Support from Atty. at Law Genaro Lara and notary sheet.	
	35	Letter of Compliance from Ms. Sandy Walsh, R.V.T., inspector V.M.B.	
	36	Historical and background letter from former employee of the Vista Veterinary Hospital, Mr. George De Geare, decorated veteran.	



Veterinary Medical Board
2005 Evergreen Street, Suite 2250, Sacramento, CA 95815
Telephone: 916-263-2610 Fax: 916-263-2621 | www.vmb.ca.gov

Petition for Reinstatement or Reduction of Penalty
Rev. 6/08

Please complete the following:

Name: IGNACIO LAMBARRI

Address: [REDACTED]

[REDACTED]

[REDACTED]

City [REDACTED] State [REDACTED] Zip [REDACTED]

Telephone: [REDACTED]
Primary Secondary

Are you licensed by any state(s) other than California? Yes No

If yes, which state(s)?

Have you ever had your license revoked, suspended, or denied, been placed on probation, or entered into a voluntary surrender of your license in any state(s) (other than California)?

Yes No

If yes, specifically explain:

(Attach separate sheet if necessary)

CRIMINAL ACTIONS

(2)

Describe any criminal actions taken by any state, local, or federal agency or court:

NONE

(Attach a separate sheet if necessary)

DOCUMENTED REHABILITATIVE EFFORTS

(1)

Describe specifically all rehabilitative efforts:

SINCE JUNE ²⁰⁰⁶ ~~2008~~ I IMPLEMENTED FIRST STEPS FOR MY REHABILITATION WERE TO CLEARLY AND UNAMBIGUOUSLY VOLUNTARILY, ACCEPT MY MISTAKES ERRORS AND OMISSIONS AND MY POOR JUDGEMENT. I HAVE LEARNED MY LESSONS DURING MY PREVIOUS GRANTED PROBATIONS I CORRECTED WHAT CAUSED SUCH PROBATIONS AND PAID DISCOVERY AND FINES. I UPGRADED MY PROFESSIONAL EDUCATION AND KNOWLEDGE WITH COURSES AND CONFERENCES FOR A TOTAL OF 71.5 HRS SINCE REVOCAION. UNDER DR MARK HANDEL SPENT MANY HOURS IN HIS STATE OF THE ART PALOMAR ANIMAL HOSPITAL, OBSERVING HIS PROCEDURES, STAFF, MEDICAL & SURGICAL CASES

(Attach a separate sheet if necessary)

CRIMINAL ACTIONS ②

Describe any criminal actions taken by any state, local, or federal agency or court:

NONE

(Attach a separate sheet if necessary)

DOCUMENTED REHABILITATIVE EFFORTS ②

Describe specifically all rehabilitative efforts:

CONT: MANAGEMENT METHODS - DISPENSING AND PHARMACY METHODS. - COMMUNICATION WITH CLIENTS, INCLUDING MANY EDUCATIONAL AND CLEAR UNAMBIGUOUS INSTRUCTIONS AND PRINTED MATERIALS FOR CLIENTS. ATTENDING IN HOUSE RADIOLOGICAL AND ULTRASOUND DIAGNOSTIC ROUNDS UNDER CERTIFIED BY VETERINARY BOARD OF RADIOLOGY DIPLOMATE. I WILL CONTINUE VISITING DR. HANDEL PRACTICE TO KEEP CURRENT AND INFORMED. SINCE 1972 I HAVE BEEN A MEMBER OF THE SAN DIEGO COUNTY VETERINARY MED ASS. SINCE 1976 AVMA MEMBER, AAEP MEMBER 1990 SCVMA MEMBER ALL TO THIS DATE.

(Attach a separate sheet if necessary)

LICENSED CALIFORNIA VETERINARIAN RECOMMENDATIONS

Verified recommendations are to be notarized affidavits and attached to the petition.

Name: DR MARK HAUDEL

Address: PALOMAR ANIMAL HOSPITAL

2331 SO MELROSE DR

VISTA CA 92081

City State Zip

Telephone: [Redacted] Primary [Redacted] Secondary

Name: DR MICHAEL A. MCCOY

Address: 132 CITRUS AVE

IMPERIAL BEACH CA 91932

City State Zip

Telephone: [Redacted] Primary [Redacted] Secondary

DR JANET HOSTON
1507 ALVARADO ST
LAKE ELSINORE CA 92530
EMPLOYMENT HISTORY PHONE [Redacted]

Name and address of employers since the revocation/discipline of your license:

Dates Job Title Employer Address and Phone Number

SINCE MAY 20 2010 TO PRESENT
DATE I HAVE NOT WORKED
TIME HAS BEEN SPENT IN MY
PROFESSIONAL AND PHYSICAL
HEALTH REHABILITATION.

(Attach separate sheet if necessary)



Compassionate Veterinary Care For Your Family Members

Dr. Mark Handel
Palomar Animal Hospital
2331 S. Melrose Dr
Vista, Ca 92081

8-27-2011

To the State of California Veterinary Medical Board,

This is a letter in support of Dr. Ignacio Lambarri, whose license was revoked in August 2010.

I have been licensed in the state of California since 1983. I have served on the Ethics Committee for the San Diego County Veterinary Medical Association since 1988. Dr. Lambarri is a member of said association and has been since 1974.

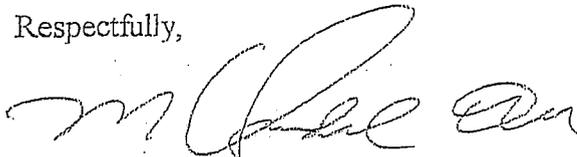
Our neighboring practices have been separated by approximately 2 miles since I moved to the area in 1987. I know Dr. Lambarri's as an honest and competent veterinarian. I have been impressed by his wide range of veterinary knowledge.

During the last few weeks Dr. Lambarri has spent some time in our practice of 3 veterinarians, observing emergency, surgical, medical, and dental procedures. In addition, he has attended our biweekly ultrasound/radiology rounds conducted by board certified radiologist, I [REDACTED]. He has participated inquisitively about several cases including diagnosis, medical and surgical management, and proper therapeutic and pharmacological use of our inventory.

I have observed during this time that Dr. Lambarri does not represent an undue risk to the public and their pets.

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

Respectfully,



Mark Handel DVM

CALIFORNIA ALL-PURPOSE CERTIFICATE OF ACKNOWLEDGMENT

State of California

County of SAN Diego

On Aug 27 2011 before me, Mike O'Malley Notary Public
(Here insert name and title of the officer)

personally appeared Mark Handel

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Mike O'Malley
 Signature of Notary Public

(Notary Seal)



ADDITIONAL OPTIONAL INFORMATION

INSTRUCTIONS FOR COMPLETING THIS FORM

Any acknowledgment completed in California must contain verbiage exactly as appears above in the notary section or a separate acknowledgment form must be properly completed and attached to that document. The only exception is if a document is to be recorded outside of California. In such instances, any alternative acknowledgment verbiage as may be printed on such a document so long as the verbiage does not require the notary to do something that is illegal for a notary in California (i.e. certifying the authorized capacity of the signer). Please check the document carefully for proper notarial wording and attach this form if required.

- State and County information must be the State and County where the document signer(s) personally appeared before the notary public for acknowledgment.
- Date of notarization must be the date that the signer(s) personally appeared which must also be the same date the acknowledgment is completed.
- The notary public must print his or her name as it appears within his or her commission followed by a comma and then your title (notary public).
- Print the name(s) of document signer(s) who personally appear at the time of notarization.
- Indicate the correct singular or plural forms by crossing off incorrect forms (i.e. ~~he/she/they~~, ~~is /are~~) or circling the correct forms. Failure to correctly indicate this information may lead to rejection of document recording.
- The notary seal impression must be clear and photographically reproducible. Impression must not cover text or lines. If seal impression smudges, re-seal if a sufficient area permits, otherwise complete a different acknowledgment form.
- Signature of the notary public must match the signature on file with the office of the county clerk.
 - ❖ Additional information is not required but could help to ensure this acknowledgment is not misused or attached to a different document.
 - ❖ Indicate title or type of attached document, number of pages and date.
 - ❖ Indicate the capacity claimed by the signer. If the claimed capacity is a corporate officer, indicate the title (i.e. CBO, CFO, Secretary).
- Securely attach this document to the signed document.

<p>DESCRIPTION OF THE ATTACHED DOCUMENT</p> <p><u>Letter</u></p> <p><small>(Title or description of attached document)</small></p> <hr/> <p><small>(Title or description of attached document continued)</small></p> <hr/> <p>Number of Pages _____ Document Date _____</p> <hr/> <p><small>(Additional information)</small></p>

<p>CAPACITY CLAIMED BY THE SIGNER</p> <p><input type="checkbox"/> Individual (s)</p> <p><input type="checkbox"/> Corporate Officer</p> <p>_____</p> <p><small>(Title)</small></p> <p><input type="checkbox"/> Partner(s)</p> <p><input type="checkbox"/> Attorney-in-Fact</p> <p><input type="checkbox"/> Trustee(s)</p> <p><input type="checkbox"/> Other _____</p>



Michael A. McCoy, D.V.M.

132 Citrus Avenue • Imperial Beach • CA • 91932
(619) 423-0495

Veterinary Medical Board, Dept. of Consumer Affairs of the State of California.

To whom it may concern:

This is an affidavit for a petition to reinstate the Veterinary License for Dr. Ignacio Lambarri;

To the best of my knowledge he does not represent any undue risk to the public.

I have known Dr. Lambarri since we were at Colorado State University in 1970 before graduating from the School of Veterinary Medicine where he remained to complete a rotating internship in the Department of Medicine and Surgery under [REDACTED]

Later, we worked together for [REDACTED] at the [REDACTED] I have known Dr. Lambarri for his dedication and devotion to veterinary medicine. When I worked with him, his standards in medicine and surgery were of a high caliber. He was honest and fair with clients.

It is my understanding that he is in good standing with the American Veterinary Medical Association, California Veterinary Medical Association and the San Diego County Veterinary Medical Association.

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

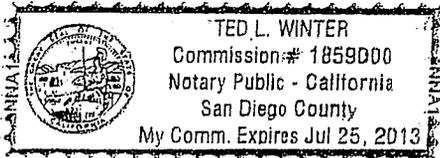
Michael Andrew McCoy 3/21/11

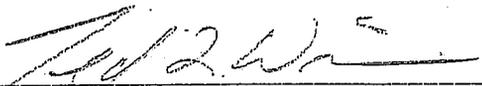
Signature

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JURAT

State of California
County of San Diego) ss.

Subscribed and sworn to (or affirmed) before me on this 11 day of
March, 2011, by Michael Andrew McCloy,
proved to me on the basis of satisfactory evidence to be the person(s) who appeared
before me.





Signature of Notary

15070 Alvarado St.
Lake Elsinore, CA 92530
(760) 739-1092

Veterinary Medical Board
2005 Evergreen St., Suite 2250
Sacramento, CA 95815

Dear Sirs,

This is an affidavit or letter of recommendation for Dr. Ignacio Lamberti as a petition to reinstate his veterinary license which was revoked last year. I know and am fully confident he does not represent an undue risk to the public. I have known Dr. Lamberti since 2004 when I heard of his professional reputation as a diagnostician and surgeon, I referred many patients to his practice the Vista Veterinary Hospital that required his expertise second opinion. When some patients required surgical intervention such as orthopedic, soft tissue, or other treatments, Dr. Lamberti provided excellent results with complete satisfaction from our mutual clients.

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

Janet E. Moston DVM
Signature

April B. 2011
~~Witness~~

sec of attachment
Meryory Public

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

CIVIL CODE § 1189

State of California

County of San Diego

On 4/8/11

Date

before me,

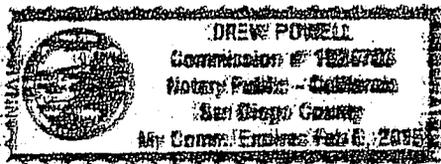
Drew Powell, notary public

Here insert Name and Title of the Officer

personally appeared

Janet E. Maston

Name(s) of Signer(s)



who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature:

[Handwritten signature of Drew Powell]

Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Description of Attached Document

Title or Type of Document: _____

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Corporate Officer — Title(s): _____

Individual

Partner — Limited General

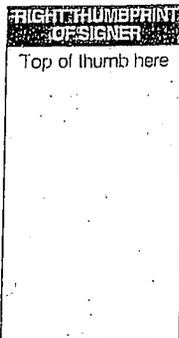
Attorney in Fact

Trustee

Guardian or Conservator

Other: _____

Signer Is Representing: _____



Signer's Name: _____

Corporate Officer — Title(s): _____

Individual

Partner — Limited General

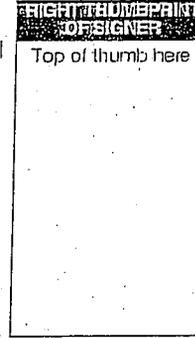
Attorney in Fact

Trustee

Guardian or Conservator

Other: _____

Signer Is Representing: _____





Animal Fertility & General Practice
Janet E. Moston, DVM

March 17, 2006



Please Deliver To:

Name: Ignacio Lamberti

Location: Vista Veterinary Hosp.

Facsimile Number: [REDACTED]

Regarding a letter for you!

From:

Name: Janet Moston DVM

Total Number Of Pages Sent Including Cover Sheet: 3

For Your Comments As You Requested

Please Call Me About This As We Discussed

For Your Information

Comments Or Special Instructions: I hope this helps! Good

Luck! I am mailing the original to you.

I pulled a fungal screen on Brandi
Wucharer yesterday & talked with Joe.

Brandi's feeling great. Her incision was a little

red in spots so I had him continue the Amoxi a

little longer. I area is still warm to touch &

feels about the same size.

Thanks again,
Janet





Animal Fertility & General Practice
Janet E. Moston, DVM

March 12, 2006

To Whom It May Concern,

This letter is to recommend Ignacio Lambarri DVM for his well deserved accreditation as a diplomate into the American College of Veterinary Surgeons.

I first met Dr. Lambarri in June of 2003 when I referred an emergency soft tissue surgical case.

I do a mobile house call practice and I have been very pleased to refer my clients to Dr. Lambarri. I have referred several orthopedic and difficult soft tissue surgeries all of which have had excellent results. The patients have healed remarkably well without complications. He's also been available for consult on surgical cases and I appreciate his knowledge and time. My clients have been very pleased with Dr. Lambarri, his staff and his facility. He is very knowledgeable and skilled. He explains the procedures, options, possible complications and follow up visits.

I have been very pleased that all referrals (orthopedic or soft tissue surgery) healed remarkably well with excellent results



Animal Fertility & General Practice
Janet E. Moston, DVM

(2)

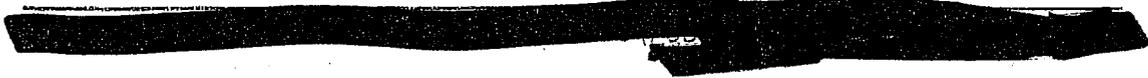
and function, I trust his judgement and acknowledge his surgical skills.

Dr. Lambarrri has been an excellent asset to be able to refer my clients to with complete confidence.

Thank you for evaluating his application. Dr. Lambarrri deserves the accreditation.

Sincerely,

Janet Moston DVM



International Veterinary Seminars

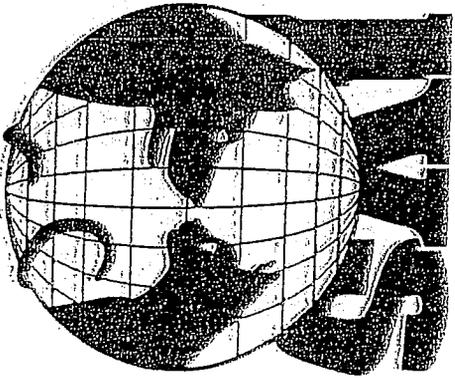
certifies that

Dr. Ignacio Lambarrì

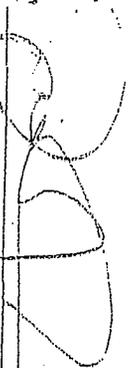
has completed 16 hours of continuing education in

managing common
feline problems

March 4 - 6, 2011



Director


Dougald Gilmore B.V.Sc., Dipl.ACVS



San Diego County Veterinary Medical Association

4620 Alvarado Canyon Road Suite 15, San Diego CA 92120

619.640.9583 • Fax: 619.640.9588 • sdcvma@aol.com • www.sdcvma.org



A California Statutorily Approved CE Provider For Veterinarians

Dr Ignacio Lambarri
1139 So Santa Fe Ave
Vista CA 92083

CE Attendance Certificate for
The San Diego County Veterinary Medical Association

*2011 Specialists' Update Sunday
March 20, 2011*

Providing a Total of 6 Hours of Continuing Education

This is to certify that **Dr Ignacio Lambarri**
attended and has completed **6 hours** of Continuing Education

Speakers

Danielle James, DVM, DACVD
Joao Orvalho, LMV, DACVIM-Cardiology
Edward Maher, DVM, DACVP-CF, DACVIM-SAIM
Priti Karnik, DVM, DACVS
Keith Richter, DVM, DACVIM-SAIM

Lenore Mohammadian, DVM, DACVR
Stefanie Schwartz, DVM, DACVB
David Lipsitz, DVM, DACVIM-Neurology
Michael Serdy, BVSc, DACVS
Tina Fife, DVM, DACVO
Mauricio Dujowich, DVM, DACVS
Patrick Melese, DVM, DACVB

Topics

- How To Work Through Challenging Cases
- 3-D Echocardiography-The New Dimension of the Heart
- Update on Thromboelastography: Coagulation's Holy Grail?
- Update on Acute Abdomen/Septic Peritonitis
- What's New In Gastroenterology: Update From the 2010 DDW Meeting
& 2011 Gastroenterology Society Meeting
- What Advanced Imaging Modality Do I Use?
- Persistent Sexual Behavior in the Dog & Cat
- Treatment of Traumatic Brain Injury
- Updates From 2010 ACVS Symposium
- Canine Corneal Disease
- Update on Urologic Surgery
- Rational Use of Behavioral Medications in General Practice

Pauline White,
Director



San Diego County Veterinary Medical Association

4620 Alvarado Canyon Road Suite 15, San Diego CA 92120

619.640.9583 • Fax: 619.640.9588 • sdcvma@aol.com • www.sdcvma.org



A California Statutorily Approved Continuing Education Provider for Veterinarians

Dr Ignacio Lambarri
PO Box 638
Bonsall CA 92003

Continuing Education Attendance Certificate for the

SAN DIEGO COUNTY VETERINARY MEDICAL ASSOCIATION
Annual Spring Veterinary Conference on April 30 - May 1, 2011

*“Ophthalmology
for the
General Practitioner”*

Providing a total of 12 Hours of Continuing Education for Veterinarians

This is to certify that
Dr Ignacio Lambarri attended the
2011 Spring Veterinary Conference
and has completed:
12 hours of Continuing Education

Instructors: Ralph Hamor, DVM, MS, DACVO
Amber Labelle, DVM, MS, DACVO

Pauline White,
Director

CERTIFICATE OF ATTENDANCE

This certificate is awarded to:

Name:

IGNAZIO LANZARRI

State of Licensure:

CA

License #

5564

For attending the program entitled: **California Veterinary Specialists' Spring 2011 Dinner CE**

On April 28, 2011 at **The Crossings at Carlsbad, Carlsbad, CA**

Subject Matter: Internal Medicine and Surgery

This program was provided by:

**California Veterinary Specialists
2310 Faraday Avenue
Carlsbad, CA 92008**

AAVSB RACE Provider # 359-8015

Authorized by:

(faculty signature)

Course meets the requirements for **1.5 hours** of continuing education credit in jurisdictions which recognize AAVSB RACE approval; however participants should be aware that some boards have limitations on the number of hours accepted in certain categories and/or restrictions on certain methods of delivery of continuing education.

2011 PACIFIC VETERINARY CONFERENCE

Anaheim, California – June 30-July 3, 2011

Certificate of Attendance

This is to confirm that IGNACIO LAMBARE completed 24 hours of Continuing Education, June 30-July 3, 2011. (Thirty-Six (36) hours maximum)

	Course Topic/Title	Speaker	CE Units
6-30	PRACTICE MANAGEMENT	DR CHARLOTTE LACROIX	6
	8:00 am 9:50 AM ETHICAL PRACTICE	THORSTEN JUNE 30-	
	10:15 12:15 RISING MALPRACTICE		
	1:45 2:25 ELECTRONIC MEDICAL RECORDS		
	2:45 3:25 INFORMED CONSENTS		
	4:45 5:30 COMPOUNDING DRUGS		
7-1	SMALL ANIMAL SURGERY	DR KAREN TOBIAS	
	8:00 8:50 TENSION RELIEF WOUNDS		
	9:00 9:50 FLAPS & GRAFTS		
	10:00 11:00 MANAGED HAND LOUNGE		
	11:30 12:20 METHICILLIN RESISTANT STAPH INE		
	1:45 2:35 INTESTINAL SURGERY TIPS		
	2:45 3:35 SMALL INTESTINE SURGERY LARGE INT		
4:15 5:30 SALIVARY MUCOCELES		7	
7-2 AM	SMALL ANIMAL MEDICINE I	DR MARK SMITH	
	8:00 8:50 ORAL TUMOR CASES -		
	9:00 9:50 MANDIBULOMAXILLOMAXILLECTOMY		
	10:30 11:20 ECTOMIES - DIFFICULT & SUCCESSFUL		
PM	SMALL ANIMAL SURGERY	DR KATHLEEN LINN	
	1:45-2:35 PHYSICAL DIAGNOSIS FORELIMBS & PAWES		4
	3:45 4:35 PHYSICAL DIAGNOSIS HAND LIMB LHS		
7-3 AM	ORTHOPEDIC CONDITIONS CATS PUPS KITTENS		3
	SMALL ANIMAL SURGERY	DR KATHLEEN LINN	
	8:00 9:00 CRUCIATE REPAIR METHODS CURRENT		
	9:30 10:30 LATERAL SUTURE REPAIR FOR CRUCIATE REPAIR		
	11:30 12:20 COMPUTATIONS EXTERNAL		
	1:40 2:30 DISTAL EXTREMITY INJURIES		
	12:40 2:14 INTERACTIVE ORTHOPEDIC CASES		4

Thank you for your support in helping to make the 2011 Pacific Veterinary Conference a success. See you next year in San Francisco, California!

Valerie R Fenstermaker
 Valerie Fenstermaker
 CVMA Executive Director

Veterinary Imaging Center of San Diego

Certificate of Attendance

is hereby granted to:

Ignacio Lambarni

(State(s) of licensure: _____ License #(s): _____)

for completing two (2) hours of RACE-approved Continuing Education Credit

by participating in the

I-131 Radiation Therapy Seminar

Authorized on July 13, 2011 by



VICSID
VETERINARY IMAGING
CENTER OF SAN DIEGO

7522-7524 Clairemont Mesa Blvd
San Diego, CA 92111
RACE Provider #439

Subject Matter:
Scientific/Clinical
Other – Radiation Therapy

Method of Delivery:
Seminar/Lecture

Seth Wallace, DVM, DACVP

Course meets the requirements for two (2) hours of continuing education credit in jurisdictions which recognize AAAPB RACE approval; however, participants should be aware that some boards have limitations on the number of hours accepted in certain categories and/or restrictions on certain methods of delivery of continuing education.

20

CONTINUING EDUCATION

List continuing education efforts: 2010 SINCE MAY, READING AND CONFERENCE STUDYING BOOKS, JOURNALS, CVC PROCEEDINGS

BOOK 2011 PAGES, FOR ALLOWED MINIM. 6 HRS

2011 - 3-4, 5 6 2011 NTL VETERINARY SEMINARS KACE APR 16 HRS

3-20-2011 SD CVMA - 2011 SPECIALISTS UPDATE 6 HRS

4-30-51 2011 SD CVMA. OPHTHALMOLOGY FOR GP 12 HRS

4-28-2011 CALIFORNIA VETERINARY SPECIALIST INTL WEDS 5 HRS

6-30 TO 7-3 2011 PACIFIC VETERINARY CONFERENCE 24 HRS

7-13 2011 VETERINARY IMAGING CENTER SD 2 HRS

(Attach a separate sheet if necessary)

CONTINUING EDUCATION TOTAL 67.5 HR

TOTAL COST COURSES REGISTRATION AND HOTEL 3293.00 PLUS TAXES FUEL WHEN DRIVING POSSIBLE.

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

Date: 9-28-11

Signature of Applicant: Ignacio J. Quintana DVM

PLEASE ENCLOSE ANY STATEMENTS YOU WISH TO MAKE REGARDING YOUR PETITION FOR REINSTATEMENT.

ENCLOSED 3 PAGES

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Ignacio Lambarri, D.V.M.
P.O. Box 638
Bonsall, CA. 92003

The Veterinary Medical Board
2005 Evergreen St., Suite 2250
Sacramento, CA. 95815

September 28, 2011

I hereby and respectfully petition the Board to reinstate my Veterinary License #5564 and Premise License #3116, revoked on August 2010, or reduction of penalty.

On the context of what caused such revocations, it is on the Veterinary Medical Board's Records. Concluding on the decision and order effective August 20, 2010, signed by Dr. Terry Becker, Board President. What follows are the true statements and documentation that justify this petition.

After more than 1 yr. of disciplinary suspension of my professional activities that made me assert that I have learned my lesson and I swear I will not repeat my mistakes. Such mistakes and omissions were the result of trying to do too many things at once which distracted my concentration on the most important matters such as compliance with the laws of the Veterinary Practice Act, but I recognized my errors and I have corrected them, never to commit them again.

For forty years in my professional life I found great meaning by applying my education and knowledge to serve my clients and patients.

In the last ten years that I have been under the disciplinary scrutiny of the Veterinary Medical Board and on August 11, 2002 I was granted probation I corrected the deficiencies stated by the inspectors, but I failed to file the reports on a timely manner, this probation was granted for three years I paid one thousand dollars in fines and one thousand, nine hundred and fifty five and twenty five cents for the cost of recovery, as a person of good character, realizing again my mistake which was to keep the practice going while I was trying to remodel it and bringing it to modern standards. In consultation with Dr. Sahara, chairman of the California Veterinary Medical Association, Regulatory Department, and after a complete and thorough voluntary inspection by Dr. Sahara we followed his guidelines and recommendations which allowed us to complete the remodel and finally passed inspection.

In May of 2004, while on vacation out of town, one of my assistants vaccinated puppies that I had previously examined while an inspector from the Veterinary Medical Board determined that she broke the law for an unlicensed activity. Since I was on probation, this incident caused the accusation by the State Board that generated the revocation of my license and permit but it was stayed and granted another probation effective September, 2006 for the next 3 years. Also, I paid fines and the cost of recovery in

the amount of four thousand, four hundred and eighty one dollars in payments of one hundred and forty nine and thirty six cents per month for approximately 30 months and finished paying it by mid 2009, demonstrating by these acts that I have taken responsibility for my mistakes and my good character.

Unfortunately, on November 1, 2007, an afternoon that my only assistant called in sick and for that reason I should have cancelled or re-scheduled the afternoon appointments, one of which was a puppy for vaccination and de-worming, what should have been a routine examination and preventative medicine case turned out to be an unforeseen accident waiting to happen. This case caught me unprepared, and I made many mistakes in my professional communications with the owner of this puppy which was first diagnosed by me as a brachycephalic syndrome puppy with symptoms of respiratory stridor, which is caused by the narrowing of the upper airways due to the conformation of a French Bulldog/Boston Terrier mix which also causes this patients high degree of anxiety and resistance to any restraint. In hindsight and with consultation of respiratory veterinary specialists, patients with narrowed upper respiratory tracks demonstrating high pitch breathing noises such as stridor have only about 10% of their airway open causing them under restraint self choking and passing out from lack of oxygenating properly which is what initially happened when I restrained this puppy with a towel and positioning him on his back to trim his nails after I administered the vaccine booster, shortly after repositioning the puppy and extending his neck pulling out his large tongue, he was able to breath as good as his condition permitted, he showed also mild symptoms of anaphylaxis or a reaction to the vaccine. I treated him symptomatically, including mask oxygen, realizing that I should have intubated his trachea during the short seconds that he was unconscious for the proper administration of oxygen. Once that he regained consciousness after this episode I should have had an assistant to hold the puppy to let me start an IV catheter which would have allowed me to administer the epinephrine previous to intravenous fluids and other appropriate medications. The lack of my communicating effectively and unambiguously in my instructions and recommendations to the owner of "Captain" and the mistakes in his treatment, caused them to justifiably complain to the Veterinary Medical Board which brought disciplinary action against me and the license and premises permit revocation, with it came the order to pay seven thousand nineteen and fifty cents which I will pay as soon as I get back to work and on my feet or from the proceeds of the sale of my veterinary hospital building only because I lost my practice and all of my clients.

Since my license revocation became affective on August 20, 2010, the Vista Veterinary Hospital has remained closed to this date, which is more than 1 year. Also, I have not worked in any capacity or occupation because unfortunately in May 20th of 2010,



I spent the rest of 2010 to this date in my-medical-recovery-and professional rehabilitation and this year of 2011, I have been able to attend veterinary seminars and conferences on

different medical , surgical and emergency topics related to small animals. A complete list and copies of certificates of continuous education and training will be enclosed with this application to reinstate my Veterinary License.

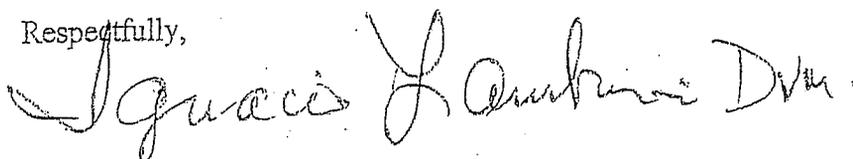
The devastating effects of my temporary health problems and the fact that I have not worked for more than 1 yr., economically speaking I do not have a source of income we have spent our retirement funds, also having to borrow money out of credit cards to be able to survive and to complete the necessary courses required. In doing so, economically it has been a disaster, so we pray that the California Veterinary Medical Board grant us another opportunity.

In conclusion, be assured that I have been rehabilitated professionally and recovered my physical and mental health. I have recognized my errors and I have paid an enormous price, while studying, reading and attending the necessary courses and to maintain current in the practice of veterinary medicine, I have spent numerous hours at the Palomar Animal Hospital which is a very modern and state of the art facility in the city of Vista . CA., where the best and more advanced methods in practice are implemented by three veterinarians with different sub-specialties each one aided by the best trained assistants and general staff with Dr. Mark Handell as the owner allowed me to observe all their methods and different procedures including radiological and ultrasound rounds under a board certified radiologist Dr. Therese Craycheek which are held at that facility every two weeks.

I am and always have been a law abiding citizen of good moral character and ethically speaking, I tried to do my best in making the right decisions based in the moral obligation to help the public and my patients also, the moral obligation of not to harm anyone.

I know I do not represent any or undue risk to the public and to my future patients, so I certify under penalty of perjury and under the laws of the State of California that the foregoing is true and correct.

Respectfully,



Ignacio Lambarri, D.V.M.



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San Diego County Veterinary Medical Association
4620 Alvarado Canyon Road Suite 15, San Diego CA 92120
619.640.9583 • Fax: 619.640.9588 • sdcvma@aol.com • www.sdcvma.org



June 24, 2011

To whom this may concern:

Doctor Ignacio Lambarri has been a member of the San Diego County Veterinary Medical Association (SDCVMA) since 1972.

Earlier in his career he was a very active participant in this association. He organized and attended continuing education programs and served in elected positions on the Executive Board.

From 1976 to 1979 he served as an association Chapter Representative. Further, in 1980 he was elected to the Vice President's position on the Executive Board.

While not all veterinarians in our community join and support their local veterinary medical association, those that do demonstrate a commitment to their profession, support of their veterinary community and a camaraderie with their fellow colleagues.

Duplicate copies of Dr. Lambarri's more recent continuing education program attendance is available upon request.

Sincerely,

Pauline White, Director

PW/

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MS, DACVS

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20

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 4620 Alvarado Canyon Road Suite 15, San Diego CA 92120
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March 3, 2011

Dr. Ignacio Lambarrí
 P.O. Box 638
 Bonsall, CA 92003

Dear Doctor Lambarrí:

At the November 9, 2005 Executive Board meeting, the Board approved an addition to the Standing Rules, which now provides for a life membership status. The addition is worded as follows: "An active member of the SDCVMA for a minimum of 25 years, and who is at least 65 years of age may petition the board for Life Membership status. Life Members will pay no dues and will retain all voting rights as an active member."

At the March 2, 2011 Executive Board meeting of the San Diego County Veterinary Medical Association your name was submitted for dues-free Life Membership status. The Executive Board motioned, seconded and passed to grant you this status as you have met all of the requirements. As a Life Member you will have all the privileges of a Regular Member, including voting. Congratulations!

Sincerely,

Miguel Espinosa, DVM
 Membership Chairman

/dh

EXECUTIVE BOARD

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 MS, DACVS
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VMA Delegates
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 Sidre Tuaoi, DVM
 Annifer Schieber, DVM

VMA District Governor
 Max Hibi, DVM

Director
 Mike White

To: Veterinary Medical Board

21 April 2010

Many years ago I wrote my first check to a veterinarian with money earned from a paper route; I hope this gives you an indication that I am a responsible person with a long history as a caring dog and animal lover. I am currently an Active Duty Navy Commander, assigned to Marine Corps Base Camp Pendleton, CA, as the Deputy Command Chaplain. I met Doctor Lambarri in Oct 2008 after returning from a two year over seas ship tour. My Bulldog Gurkha had some medical issues and I went to Vista Veterinary Hospital. Gurkha is my third bulldog in 25 years and will be 13 years old on 6AUG11. My last bulldog Tank lived to be 13 years old. As a long time bulldog owner I am very particular that the Vet I go to is knowledgeable and appreciates the challenges that can be part of the Bulldog breed. Since first coming to Dr. Lambarri, I have come to have total confidence in his abilities as a Veterinarian.

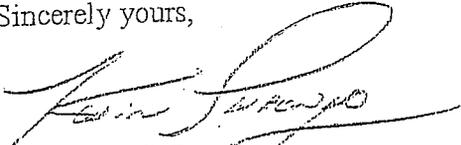
One of the challenges of being Active Duty Military is that it requires me to move every few years, so I am forced to change Vets. In the last eleven years I have used 4 different Vets (all good) but I can say without reservation that Dr. Lambarri is the best and the most Bulldog friendly Vet I have been too. Please allow me to share why I believe this. First of all, I should tell you that I do not wear my uniform or clerical attire when I take my dogs to the Vet. So until just before Christmas 2009, no one at Vista Veterinary Hospital knew anything about me other than I loved bulldogs and had a military hair cut. I say this to make the point that I was a regular client and always received the same caring and quality veterinary services as do all Dr. Lambarri's patients and their owners. One of the qualities that I appreciate is to have things explained to me and then asked if I have questions. I like Dr. Lambarri's thoroughness during the exam, I like that he covers various possibilities and that he is honest in saying that it is some times hard to know exactly with animals. He also explains why he would like to use a particular treatment and what are the pro and cons if any. Since the time I have been going to see Dr. Lambarri, I have also observed that he does this with all his patients. I have also personally observed that he has gently but firmly told owners that they needed to do certain things, for example; clean the animals living area, in order to keep their animal healthy. Sometimes it was things that the owners were doing or not doing, that were endangering their pets health.

In the Fall of 2009, Gurkha required surgery. Even though Gurkha is in relatively good health, an eleven year old bulldog is an eleven year old bulldog and I was concerned. Dr. Lambarri went through everything he was going to do and thoroughly checked out Gurkha's health to make sure he was healthy enough to undergo the operation. I am happy to say that Gurkha did very well and has recovered nicely. This past November a Bulldog puppy named Matilda has been added to the house hold... Gurkha thinks I am crazy... he may be right. Matilda has been to see Dr. Lambarri several different times for various issues. When I had Matilda spayed and while she was at Vista Veterinary Hospital for the surgery, Dr. Lambarri called and drew to my attention to Matilda's tonsils' which were large and that the opening in her throat was small. I was able to go in and see for my self that this was true and I choose to have the tonsils' taken out and the

soft pallet trimmed. Matilda now breaths better and her snoring has definitely improved. I truly appreciated having this common bulldog problem brought to my attention and having the opportunity to take care of it now before it became a more serious problem. This last example is just one more reason why I believe that Dr. Lambarri is a great Vet and why I will keep going back. I also recommend him to my friends and anyone who asks.

Please feel free to contact me if you had any questions or would like additional feedback.

Sincerely yours,



Rev. Kevin J. Sweeney
Commander, CHC, USN
Deputy Command Chaplain



CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

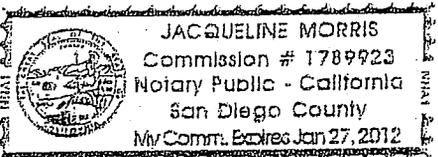
State of California

County of San Diego

On 27 Jun 11 before me, JACQUELINE MORRIS, NOTARY PUBLIC
Date Here Insert Name and Title of the Officer

personally appeared Kevin John Sweeney
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s) or the entity upon behalf of which the person(s) acted, executed the instrument.



I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature: Jacqueline Morris
Signature of Notary Public

Place Notary Seal and/or Stamp Above

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Description of Attached Document
Title or Type of Document: Veterinary Medical Board

Document Date: 21 Apr 10 Number of Pages: 2

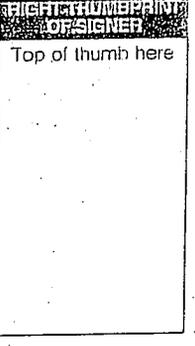
Signer(s) Other Than Named Above: _____
Capacity(ies) Claimed by Signer(s)

Signer's Name: _____ Signer's Name: _____

- Corporate Officer — Title(s): _____
- Individual
- Partner — Limited General
- Attorney in Fact
- Trustee
- Guardian or Conservator
- Other: _____



- Corporate Officer — Title(s): _____
- Individual
- Partner — Limited General
- Attorney in Fact
- Trustee
- Guardian or Conservator
- Other: _____



Signer Is Representing: _____

Signer Is Representing: _____

To: Veterinary Medical Board,

From: Rev. Kevin J. Sweeney

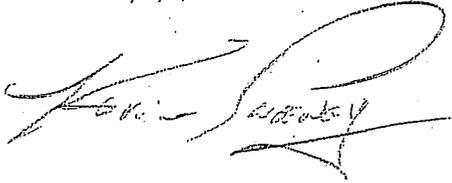
Subj: Dr. I. Lambarri

Having reviewed the Letter that I originally wrote in April last year; I reaffirm and reiterate everything in that letter. Furthermore, I would emphasize that I feel even more strongly after this time of Dr. Lambarri's absence as a Veterinarian. In the time that has passed, I have had to go to a different Vet. While that Vet was certainly competent and caring; I did not feel that I received the same level of personal care that I have become accustomed too with Dr. Lambarri.

I would like to petition the Veterinary Medical Board to please reinstate Dr. Lambarri's Veterinary License. I believe whole heartedly that Dr. Lambarri in no way presents an undue risk to the public and their cherished pets. If there was even a question here, I would never have continued to bring my dogs to his Animal Hospital for basic care and surgery. Having experienced many good Vets in my years as a pet owner; I can say with great confidence that I believe Dr. Lambarri is well qualified and fit to practice Veterinary medicine and surgery. As an Active Duty military Chaplain; there is an overseas deployment in my future. I can tell you with all sincerity that I would be able to leave my beloved Bullies with greater peace of mind, if I knew that Dr. Lambarri was able to care for them in my absence.

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

Sincerely yours,

A handwritten signature in black ink, appearing to read "Rev. Kevin J. Sweeney". The signature is stylized with a large, sweeping initial "K" and "S".

Rev. Kevin J. Sweeney

Commander, United States Navy

Deputy Command Chaplain



CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

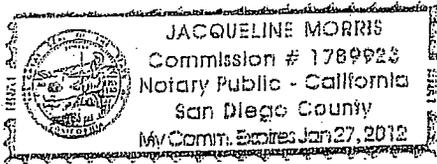
State of California

County of San Diego

On 27 Jun 11 before me, JACQUELINE MORRIS, NOTARY PUBLIC
Date Here Insert Name and Title of the Officer

personally appeared Kevin John Sweeney
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.



I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature: Jacqueline Morris
Signature of Notary Public

Place Notary Seal and/or Stamp Above

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Description of Attached Document
Title or Type of Document: Veterinary Medical Board

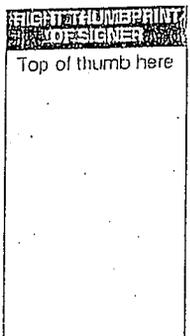
Document Date: 27 Jun 11 Number of Pages: 2

Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____

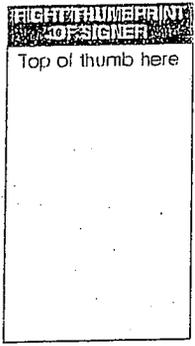
- Corporate Officer — Title(s): _____
- Individual
- Partner — Limited General
- Attorney in Fact
- Trustee
- Guardian or Conservator
- Other: _____



Signer Is Representing: _____

Signer's Name: _____

- Corporate Officer — Title(s): _____
- Individual
- Partner — Limited General
- Attorney in Fact
- Trustee
- Guardian or Conservator
- Other: _____



Signer Is Representing: _____

Genaro Lara, Attorney at Law, [REDACTED]

August 1, 2011

Veterinary Board of the State of California

Letter in support of Ignacio Lambarri's petition for reinstatement of his Veterinary Medical License

I am a practicing attorney in the State of California since 1990. Prior to that date I practiced law in the City of Chicago, Illinois for a number of years. In the mid- 1990's I met Dr. Ignacio Lambarri through a mutual friend. I have met Dr. Lambarri on social occasions at his home he has likewise visited me at my house with his wife, Dolores. I write this letter on his behalf as a personal friend, and not as his attorney.

At that time, my wife owned two cocker spaniels that were treated by Dr. Lambarri on several occasions. I observed Dr. Lambarri treat "Rita", the name of one of the dogs, in a most professional and caring manner at his hospital. During visits with our dog, I also observed his professional demeanor with other dog owners whom he treated with courtesy and respect. His behavior as a human being generally was nothing if not characterized with respect, politeness and caring.

In the mid 2010, I became aware of his case before the administrative board in which he was charged with violation of Business and Professions Code. He was represented by private counsel. At that time, I addressed a letter to the prosecuting counsel voicing my concern for a fair hearing in the administrative board. Subsequently, after losing his administrative trial, his license was revoked. He has been in contact with me and has related to me the problems which he revocation of his license entailed.

Dr. Ignacio Lambarri's [REDACTED]

[REDACTED] for the care of his [REDACTED]

perform ordinary chores around his home. While I do not pretend to render an opinion outside my professional domain and I am not a medical doctor, my own

observations of Dr. Lambarri, his ability to carry out ordinary chores, his physical demeanor, stamina, all these factors would lead me to conclude that he would be able to carry out the necessary tasks in the treatment and care of animals at his hospital. On many occasions he has expressed to me his deep desire to return to the practice of veterinary medicine, as he has done for many years and to a profession which he enjoys and which he has devoted his life. He has completed many hours of continuing medical education recently and he will provide documentary proof of attendance and completion of course studies sponsored by recognized professional providers.

I am aware of the facts and circumstances which led to the revocation of his license in the year 2010. In conversations with him regarding the allegations, Dr. Lambarri has expressed great remorse and contrition for his conduct in that case. He is deeply law abiding human being that committed human error and has admitted his wrong doing and wrongfulness of his actions.

He has paid the penalties imposed by the authorities in the revocation of his license and complied with payment of fees of the previously imposed probations. He will also pay the fees imposed by the revocation, hopefully after the reinstatement of his license and as soon as he gets back on his feet financially so he respectfully prays that his license to practice veterinary medicine be reinstated.

Given his training, experience, education, the lessons learned from the previous revocation, the continuing medical training, I do not believe that he represents any undue risk to the animals of his clients, or to the public at large. He is a committed professional veterinarian with a life passion for the care and treatment of animals.

Considering the entire facts surrounding the circumstances of the case of Dr. Lambarri before the Veterinary Medical Board, the ensuing consequences of the revocation of his license, the closure of his clinic and the loss of income for over one year, Dr. Lambarri has gone through extreme hardship. He has taken personal responsibility for his actions. Paradoxically, due to the Veterinary Board's actions, he has become a better and more experienced practitioner.

I would hope and pray that the Veterinary Board will consider and weigh all of the factors in mitigation and aggravation in determining the application for reinstatement of his license before the Board. In the interest of justice and fairness, I would hope that the Board will see fit to reinstate Dr. Lambarri to the practice of Veterinary medicine.

I certify under penalty of perjury under the laws fo the State of California that the above is true and correct.

G.L.

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

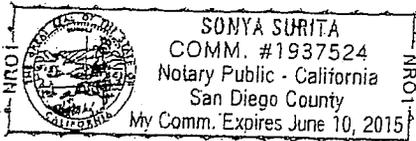
State of California

County of SAN Diego

On Aug 2 2011 before me, Sonya Surita, Notary Public
Date Here Insert Name and Title of the Officer

personally appeared GENARO LARA
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.



I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature: Sonya Surita
Signature of Notary Public

Place Notary Seal and/or Stamp Above

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Description of Attached Document

Title or Type of Document: LTR of Re-enrollment of Medical License

Document Date: 8-2-11 Number of Pages: 3

Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____ Signer's Name: _____

Corporate Officer — Title(s): _____

Corporate Officer — Title(s): _____

Individual

Individual

Partner — Limited General

Partner — Limited General

Attorney in Fact

Attorney in Fact

Trustee

Trustee

Guardian or Conservator

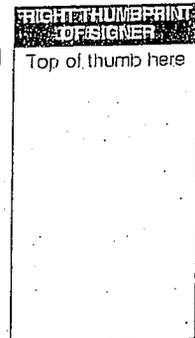
Guardian or Conservator

Other: _____

Other: _____

Signer Is Representing: _____

Signer Is Representing: _____



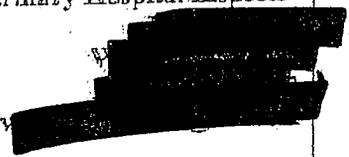
4 of 4

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Veterinary Medical Board
1420 Howe Avenue, Suite 6
Sacramento, CA 95825



Sandy Walsh, RVT, CVPM
Veterinary Hospital Inspector



Fax

To: Vista Vet Hospital Date: 12/17/07
Fax: [Redacted]

COMPLIANCE RECEIPT NOTIFICATION

Dear Doctor,

The required compliance documents for violations noted during my inspection of your facility have been received. I have approved your hospital and submitted the necessary documentation to the Veterinary Medical Board.

Repeat inspections to insure compliance may occur. Failure to maintain compliance after your compliance documents are submitted can result in citations and fines by the Veterinary Medical Board.

If you have any questions, please contact the VMB at (916) 263-2610.

Thank you for your cooperation and your attention to this matter.

Sandy Walsh RVT, CVPM

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To Whom It May Concern; For five years I was employed by Dr. I. Lombarie at the Hospital there in Vista, California.... this was an establishment well established and functional for over 35 years..The Doctor had recently purchased the facility.. The overall condition of the entire facility was in need of upgrading and modernization... The Doctor had stated to me, that, he wanted to cleanup/update/modernize to hospital, while keeping the facility operating with in normal hours...there was a large client list of patients.. Well, starting right off, we spent many hours cleaning out the entire area..The hospital at that time composed of the following rooms/area's. there was the main administrative area, two exam rooms, med room/center, office. These were located at the front of the building...Behind the exam rooms was the lab, x-ray developing room, the general lab area, extended exam area, the operation room, the pre-op and post op room...There was a large storage area, There was a patient washing and grooming area...This lead to a kennel area...there was dog kennels there, several had not been used in a lone time...there was an isolation/post room/area/room...The overall facility was large and functional to a degree and it appeared to me that there had not been any real work on repair/modernization at all, or at least for many years...During the entire 5 years that I was employed there, work in these areas was carried on...things that had not worked for along time was made to work, area's that needed cleaning deeply, was cleaned.. the entire place was opened up/out for more light and air...we built a new operating room. the entire roof was recovered and sealed..sky lights was installed, , everything was cleaned and freshly painter,, all the while, patients were/was being seen and treated in a thoroughly professional ..The overall facility became near new as the Doctor plied his trade and worked unending to give the place the much needed uplift...work ,,continued,, the normal hours was 8 to 9 hours a week day, soon ,as the patient list grew larger and large, the week ends , at least for the staff , increased to 6 days per week ..Doctor Lombarrie's entire family assisted him ,from time to time, during this time frame...I never seem Dr. Lambarrie act other than a true professional in his field..He cared for the patients as if they were/was his very own. I observed/assisted him in some very new/complicated operations...I have , at that time, a large back ground for many years...in patient care/safety. I had worked in health facilities prior to this position...In the 5 years that I was employed there, I became good friends with the Doctor, his entire family..We spent time at work and away.. I have visited the hospital twice since 1995, I was there in the area while visiting my son, who at the time lived in Oceanside..Each time, the first think I noticed was the outside of the Hospital..Always in the phase of up dating..then , when entering, surprised at the total over haul of the entire area..Yes, progress had/has been the , or one of the most important items here... more patients, different personnel, still there is the family influence. new kennel area, and out side and inside exercise area, and you could go on and on... The Doctor still maintains his attitude of care/safety/ and correct operational requirements for all his patients. The Doctor, has treated my pets, my family/friend pets. there has never been a compliant..I talk with the Doctor from time to time, even though I'm far away,,friend ships are like that.. here again the care and concern for the profession is most always the prime topic of the conversations..I'm old/older now, and have some health issues of my own,, but, I would work for/with the Doctor again if I was there...You always felt that you had given a good days work there, you felt that the patients was/were and will be, well taken care of...I often think, the animals knew that they was in the right place as well.. I see no problems with the facility, the Doctor, the staff.. given continued time and material. people support ,this Hospital will develop into an outstanding one, one that can be used as an example for others to follow.. It takes time to build a lasting professional business...you can not establish relations with patients over night...If you r anyone else require more information, please tell the Doctor of your request,, and I'll be more than glad to assist you.... I hope that this letter gives you some insight, this man had applied himself unselfishly to the Hospital , the Patients and the entire staff..There should be more like him,, perhaps, in time there will be... [REDACTED]

George E. DeGard
March 4th 2006

Account of Time Statement



March 20, 2012

Ignacio A. Lambarri, DVM


Re: Petition for Reinstatement or Reduction of Penalty

Dear Dr. Lambarri:

At the request of the Veterinary Medical Board, I have been assigned to conduct a background investigation concerning your Petition for Reinstatement or Reduction of Penalty.

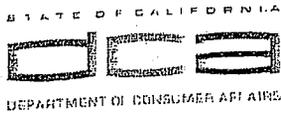
Part of this investigation requires that we meet for an interview. Please contact me at the number on this letterhead to arrange for an appointment.

Thank you for your cooperation in this matter.

Sincerely,



Susan Calders
Senior Investigator



STATE AND CONSUMER SERVICES AGENCY • ARNOLD SCHWARZENEGGER GOVERNOR
DIVISION OF INVESTIGATION
4995 Murphy Canyon Road, Suite 207
San Diego, CA 92123
P 858-637-7120 F 858-637-7126



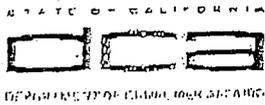
FAX TRANSMITTAL SHEET

Date: 04/27/12
Number of Pages Following Cover Sheet:
This FAX Directed To: San Diego Police Department
Department / Division / Unit: Records Division
Business Number: (619) 531-2845
FAX Number: (619) 233-4206

This FAX Has Been Sent By: Susan Calders
Investigator
Business Number: (858) 637-7120
FAX Number: (858) 637-7126

Message / Remarks: Please route this to or the appropriate person responsible for handling this request.
Please advise if there is any criminal history for the following individual:
Ignacio A. Lambarr
DOB: [REDACTED]
SS#: [REDACTED]
Male/Cauc: [REDACTED]
LKA: [REDACTED]
Thank you

PRIVACY NOTICE: THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, OR EXEMPT FROM DISCLOSURE UNDER APPLICABLE FEDERAL OR STATE LAW. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPY OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA U.S. POSTAL SERVICE. THANK YOU.



STATE AND MUNICIPAL SERVICE AGENCY / ARNOLD SCHWARZENEGGER GOVERNOR
DIVISION OF INVESTIGATION
4885 Murphy Canyon Road, Suite 207
San Diego, CA 92123
P 858-637-7120 F 858-637-7126



FAX TRANSMITTAL SHEET

Date: 04/27/12	Number of Pages Following Cover Sheet:
This FAX Directed To: San Diego Police Department	
Department / Division / Unit: Records Division	
Business Number: (619) 531-2845	FAX Number: (619) 233-4206

This FAX Has Been Sent By: Susan Calders Investigator	
Business Number: (858) 637-7120	FAX Number: (858) 637-7126

Message / Remarks: Please route this to or the appropriate person responsible for handling this request.

Please advise if there is any criminal history for the following individual:

Ignacio A. Lambarr
 DOB: [REDACTED]
 SS#: [REDACTED]
 Male/Cau: [REDACTED]
 LKA: [REDACTED]

NO CRIMINAL HISTORY

MAY - 3 2012

ID. NO. 8760
 SAN DIEGO POLICE DEPT.
 RECORDS DIVISION

Thank you

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