

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

**In the Matter of the Citation Against:**

**Jonathan Wu**

**Unlicensed**

**Respondent**

**Citation No. 4602022000218**

**CITATION**

Complainant alleges:

**PARTIES**

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

**STATUTORY PROVISIONS**

3. Business and Professions Code (BPC) sections 148 and 4875.7 and California Code of Regulations (CCR), Title 16, section 2043 authorize the Executive Officer of the Board to issue a citation to a person or entity, and that person or entity shall be subject to an administrative fine of no less than two thousand dollars (\$2,000) and not exceeding ten thousand dollars (\$10,000) for each violation of practicing or offering to practice veterinary medicine without a license, registration, or permit issued by the board pursuant to this chapter. The maximum fine for unlicensed activity is separate and not inclusive of fines for other violations.

4. BPC section 149 authorizes the Board to issue citations to individuals who are advertising with respect to the offering or performance of services without being properly licensed by the Board.
5. BPC section 4825 provides that it is unlawful for any person to practice veterinary medicine or any branch thereof in this State unless at the time of so doing, such person holds a valid, unexpired, and unrevoked license as provided by this chapter.
6. BPC section 4826 states, in pertinent part, that a person practices veterinary medicine, surgery, and dentistry, and the various branches thereof, when the person does any one of the following:
  - (a) Represents oneself as engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry in any of its branches.
  - (b) Diagnoses or prescribes a drug, medicine, appliance, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals.
  - (c) Administers a drug, medicine, appliance, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals, except where the medicine, appliance, application, or treatment is administered by a registered veterinary technician or a veterinary assistant at the direction of and under the direct supervision of a licensed veterinarian subject to Article 2.5 (commencing with Section 4836) or where the drug, including, but not limited to, a drug that is a controlled substance, is administered by a registered veterinary technician or a veterinary assistant pursuant to Section 4836.1. However, no person, other than a licensed veterinarian, may induce anesthesia unless authorized by regulation of the board.
  - (d) Performs a surgical or dental operation upon an animal.

[...]

**FACTUAL ALLEGATIONS:**

7. On August 15, 2022, the Board conducted an Inspection at Family Pet Hospital. During the Inspection, the Investigator observed Respondent displaying the veterinarian license of his father and purporting it to be his own. The Investigator observed Respondent advertising himself as a veterinarian on Family Pet Hospital's website.

8. Witnesses interviewed by the Investigator confirmed Respondent performed surgeries, made incisions into patients, removed fox tails, and treated parvovirus between May 2021 and June 6, 2021. Witnesses also stated Respondent performed a physical exam and administered vaccines to a canine patient, Spike, on July 6, 2022; and stated between April 2, 2022, and September 15, 2022, Respondent treated an animal patient owned by M. M. for an infection.
9. The Investigator also reviewed a February 13, 2023, Yelp post authored by A.G., who stated approximately six months earlier, Respondent diagnosed a mass on his canine's neck and prescribed medications to treat the mass.

### **CAUSE FOR CITATION**

10. On or about and between May 2021 through June 6, 2021, Respondent engaged in the practice of veterinary medicine by performing surgical procedures, removing foxtails, and treating parvovirus in animal patients. The Board has not issued a license to practice veterinary medicine to Respondent. Such practice of veterinary medicine constitutes a violation of BPC 4825 and 4826, subdivision (d).
11. On or about July 6, 2022, Respondent engaged in the practice of veterinary medicine, by performing a physical examination and administering vaccinations to animal patient Spike. The Board has not issued a license to practice veterinary medicine to Respondent. Such practice of veterinary medicine constitutes a violation of BPC 4825 and 4826, subdivision (c).
12. In or around May 2022, Respondent engaged in the practice of veterinary medicine by diagnosing and prescribing medications to an animal patient owned by A.G. The Board has not issued a license to practice veterinary medicine to Respondent. Such practice of veterinary medicine constitutes a violation of BPC 4825 and 4826, subdivisions (b) and (c).
13. Between April 2, 2022, and September 15, 2022, Respondent treated an animal patient owned by M. M. for an infection. The Board has not issued a license to practice veterinary medicine to Respondent. Such practice of veterinary medicine constitutes a violation of BPC 4825 and 4826, subdivisions (b) and (c).
14. On or about and between May 2021 through July 23, 2024, Respondent represented himself on Family Pet Hospital's website as a licensed veterinarian and displayed the veterinarian license of his father, purporting it to be his own. The Board has not issued a license to practice veterinary medicine to Respondent. Such conduct constitutes a violation of BPC sections 4825 and 4826, subdivision (a).

**DETERMINATION OF ISSUES**  
**CAUSE OF ACTION**

15. A violation exists pursuant to BPC sections 4825 and 4826, subdivision (d). Based upon violations as set forth in Paragraph 10, a cause of action thereby exists.
16. A violation exists pursuant to BPC sections 4825 and 4826, subdivision (c). Based upon violations as set forth in Paragraph 11, a cause of action thereby exists.
17. A violation exists pursuant to BPC sections 4825 and 4826, subdivisions (b) and (c). Based upon violations as set forth in Paragraph 12, a cause of action thereby exists.
18. A violation exists pursuant to BPC sections 4825 and 4826, subdivisions (b) and (c). Based upon a violation as set forth in Paragraph 13, a cause of action thereby exists.
19. A violation exists pursuant to BPC sections 4825 and 4826, subdivision (a). Based upon a violation as set forth in Paragraph 14, a cause of action thereby exists.

**PENALTY**

20. In compliance with BPC sections 125.9 and 4875.7, and CCR, Title 16, section 2043, subsection (e), it is determined that:

Respondent be cited for a violation in the amount of \$5,000 for the Cause for Citation, based upon a determination that the above-described facts in Paragraph 10 constitutes violations of BPC sections 4825 and 4826, subdivision (d).

Respondent be cited for a violation in the amount of \$5,000 for the Cause for Citation, based upon a determination that the above-described facts in Paragraph 11 constitutes violations of BPC sections 4825 and 4826, subdivision (c).

Respondent be cited for a violation in the amount of \$5,000 for the Cause for Citation, based upon a determination that the above-described facts in Paragraph 12 constitutes violations of BPC sections 4825 and 4826, subdivisions (b) and (c).

Respondent be cited for a violation in the amount of \$5,000 for the Cause for Citation, based upon a determination that the above-described facts in Paragraph 13 constitutes violations of BPC sections 4825 and 4826,

subdivisions (b) and (c).

Respondent be cited for a violation in the amount of \$2,000 for the Cause for Citation, based upon a determination that the above-described facts in Paragraph 14 constitutes a violation of BPC sections 4825 and 4826, subdivision (a).

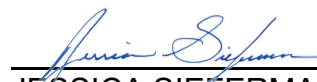
21. In compliance with BPC sections 125.9 and 4875.2, and CCR, Title 16, section 2043, subsection (c), the total penalty for the above violations is \$22,000.

**ORDER OF ABATEMENT**

The Board hereby orders Respondent to cease and desist from violating BPC sections 4825, 4826, subdivisions (a), (b), (c), and (d).

In addition, pursuant to BPC section 149, subdivision (a)(2), the Board orders Respondent to notify the telephone company furnishing the services to Respondent to disconnect the telephone service furnished to any telephone number contained in the unlawful advertising.

April 27, 2026  
\_\_\_\_\_  
DATE

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

**CONTEST OF CITATION**  
**(Business and Professions Code (BPC) Sections 125.9 and 4875.6)**

If you desire to administratively contest the citation or the proposed assessment of a civil penalty therefore and want to request an informal conference, you must, within 30 business days after you receive the citation, notify the executive officer in writing of your request for an informal conference with the executive officer or his or her designee. (BPC, § 4875.6, subd. (a).)

If you desire a hearing to contest the finding of a violation, you must submit a written request for hearing to the Veterinary Medical Board (Board) within 30 days of the date of issuance of the citation or assessment. (BPC, § 125.9, subd. (b)(4).)

Submit your request for an informal conference or hearing to contest the citation to the following address:

Veterinary Medical Board  
1747 N. Market Blvd., Suite 230  
Sacramento, CA 95834.

If you fail to notify the executive officer or Board in writing that you intend to contest the citation or the proposed assessment of a civil penalty therefor, by either submitting a request for an informal conference or hearing as described above, the citation or the proposed assessment of a civil penalty shall be deemed a final order of the Board and shall not be subject to further administrative review. (BPC, § 4875.6, subd. (a).)

You may, in lieu of contesting a citation, transmit to the Board the amount assessed in the citation as a civil penalty, within 10 business days after receipt of the citation. (BPC, § 4875.6, subd. (b).)

Failure of a licensee or registrant to pay a civil penalty within 30 days of the date of receipt of the assessment, unless the citation is being appealed, may result in disciplinary action being taken by the Board. When a citation is not contested and a civil penalty is not paid, the full amount of the assessed civil penalty shall be added to the fee for renewal of the license or registration. A license or registration shall not be renewed without payment of the renewal fee and civil penalty. (BPC, § 125.9, subd. (b)(5).)

If you are an unlicensed person, you may notify the Board and file a petition for a writ of administrative mandamus under section 1094.5 of the Code of Civil Procedure within 30 calendar days after receipt of the citation, without engaging in an informal conference or administrative hearing. Payment of any fine shall not constitute an admission of the violation charged. (BPC, § 4875.6, subd. (b).)