

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

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

**Timothy Allan Jones**

**Respondent**

**Citation No. 4602022000782**

**CITATION**

Complainant alleges:

**PARTIES**

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

**STATUTORY PROVISIONS**

3. Business and Professions Code (BPC) sections 125.9, 148, and 4875.2 and California Code of Regulations (CCR), title 16, section 2043 authorize the Executive Officer of the Board to issue citations containing orders of abatement and/or administrative fines against a licensee of the Board, or to an unlicensed person, who has committed any acts or omissions in violation of the Veterinary Medicine Practice Act (Act).
4. BPC section 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:

It is unlawful for any person to practice veterinary medicine or any branch thereof in this State unless at the time of so doing, such person holds a valid, unexpired, and unrevoked license as provided in the Act.

[...]

6. BPC section 4826<sup>1</sup>, provides, in pertinent part:

A person practices veterinary medicine, surgery, and dentistry, and the various branches thereof, when he or she does any one of the following:

(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 4832) 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.

[...]

(f) Uses any words, letters, or titles in such connection or under such circumstances as to induce the belief that the person using them is engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry. This use shall be prima facie evidence of the intention to represent himself as engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry.

### **CAUSE FOR CITATION**

7. On or about September 13, 2021 and September 30, 2021, Respondent diagnosed animal patient L.H. The Board has not issued a veterinary license to Respondent. Such unlicensed conduct constitutes a violation of BPC section 4825, as defined in BPC section 4826, subdivision (b).

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<sup>1</sup> BPC section 4826 operative January 1, 2013 through December 31, 2021.

8. On or about September 13, 2021 and September 30, 2021, Respondent administered medication and treatment to animal patient L.H. The Board has not issued a veterinarian license to Respondent. Such unlicensed conduct constitutes a violation of BPC section 4825, as defined in BPC section 4826, subdivision (c).
9. On or about November 17, 2021, Respondent diagnosed animal patient C.S. The Board has not issued a veterinarian license to Respondent. Such unlicensed conduct constitutes a violation of BPC section 4825, as defined in BPC section 4826, subdivision (b).
10. On or about November 17, 2021, Respondent administered medication and treatment to animal patient C.S. The Board has not issued a veterinarian license to Respondent. Such unlicensed conduct constitutes a violation of BPC section 4825, as defined in BPC section 4826, subdivision (c).
11. On or about November 17, 2021, Respondent diagnosed animal patient J.Y. The Board has not issued a veterinarian license to Respondent. Such unlicensed conduct constitutes a violation of BPC section 4825, as defined in BPC section 4826, subdivision (b).
12. On or about November 17, 2021, Respondent administered medication and treatment to animal J.Y. The Board has not issued a veterinarian license to Respondent. Such unlicensed conduct constitutes a violation of BPC section 4825, as defined in BPC section 4826, subdivision (c).
13. On or about November 17, 2021, Respondent diagnosed animal patient O.K. The Board has not issued a veterinarian license to Respondent. Such unlicensed conduct constitutes a violation of BPC section 4825, as defined in BPC section 4826, subdivision (b).
14. On or about November 17, 2021, Respondent administered medication and treatment to animal patient O.K. The Board has not issued a veterinarian license to Respondent. Such unlicensed conduct constitutes a violation of BPC section 4825, as defined in BPC section 4826, subdivision (c).
15. On or about November 17, 2021, Respondent diagnosed animal patient P.R. The Board has not issued a veterinarian license to Respondent. Such unlicensed conduct constitutes a violation of BPC section 4825, as defined in BPC section 4826, subdivision (b).
16. On or about November 17, 2021, Respondent administered medication and treatment to animal patient P.R. The Board has not issued a veterinarian license to Respondent. Such unlicensed conduct constitutes a violation of BPC section 4825, as defined in BPC section 4826, subdivision (c).

17. On or about November 18, 2021, Respondent diagnosed animal patient B.K. The Board has not issued a veterinarian license to Respondent. Such unlicensed conduct constitutes a violation of BPC section 4825, as defined in BPC section 4826, subdivision (b).
18. On or about November 18, 2021, Respondent administered medication and treatment to animal patient B.K. The Board has not issued a veterinarian license to Respondent. Such unlicensed conduct constitutes a violation of BPC section 4825, as defined in BPC section 4826, subdivision (c).
19. On or about November 18, 2021 and November 19, 2021, Respondent diagnosed animal patient R.Y. The Board has not issued a veterinarian license to Respondent. Such unlicensed conduct constitutes a violation of BPC section 4825, as defined in BPC section 4826, subdivision (b).
20. On or about November 18, 2021, Respondent administered medication and treatment to animal patient R.Y. The Board has not issued a veterinarian license to Respondent. Such unlicensed conduct constitutes a violation of BPC section 4825, as defined in BPC section 4826, subdivision (c).
21. On or about August 17, 2021 through November 19, 2021, Respondent represented himself as a veterinarian at Brent-Air Animal Hospital. The Board has not issued a veterinarian license to Respondent. Such unlicensed conduct constitutes a violation of BPC section 4825, as defined in BPC section 4826, subdivision (f).

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

22. Two violations exist pursuant to BPC section 4825, as defined in BPC 4826, subdivision (b), as set forth in Paragraph 7. A cause of action thereby exists.
23. Two violations exist pursuant to BPC section 4825, as defined in BPC 4826, subdivision (c), as set forth in Paragraph 8. A cause of action thereby exists.
24. A violation exists pursuant to BPC section 4825, as defined in BPC 4826, subdivision (b), as set forth in Paragraph 9. A cause of action thereby exists.
25. A violation exists pursuant to BPC section 4825, as defined in BPC 4826, subdivision (c), as set forth in Paragraph 10. A cause of action thereby exists.
26. A violation exists pursuant to BPC section 4825, as defined in BPC 4826, subdivision (b), as set forth in Paragraph 11. A cause of action thereby exists.
27. A violation exists pursuant to BPC section 4825, as defined in BPC 4826, subdivision (c), as set forth in Paragraph 12. A cause of action thereby exists.

28. A violation exists pursuant to BPC section 4825, as defined in BPC 4826, subdivision (b), as set forth in Paragraph 13. A cause of action thereby exists.
29. A violation exists pursuant to BPC section 4825, as defined in BPC 4826, subdivision (c), as set forth in Paragraph 14. A cause of action thereby exists.
30. A violation exists pursuant to BPC section 4825, as defined in BPC 4826, subdivision (b), as set forth in Paragraph 15. A cause of action thereby exists.
31. A violation exists pursuant to BPC section 4825, as defined in BPC 4826, subdivision (c), as set forth in Paragraph 16. A cause of action thereby exists.
32. A violation exists pursuant to BPC section 4825, as defined in BPC 4826, subdivision (b), as set forth in Paragraph 17. A cause of action thereby exists.
33. A violation exists pursuant to BPC section 4825, as defined in BPC 4826, subdivision (c), as set forth in Paragraph 18. A cause of action thereby exists.
34. Two violations exist pursuant to BPC section 4825, as defined in BPC 4826, subdivision (b), as set forth in Paragraph 19. A cause of action thereby exists.
35. A violation exists pursuant to BPC section 4825, as defined in BPC 4826, subdivision (c), as set forth in Paragraph 20. A cause of action thereby exists.
36. A violation exists pursuant to BPC section 4825, as defined in BPC 4826, subdivision (f), as set forth in Paragraph 21. A cause of action thereby exists.

### **PENALTY**

37. In compliance with BPC sections 148 and 4875.2 and CCR, title 16, section 2043, it is determined that:
  - a) Respondent be cited for nine Class “C” violations in the amount of \$2,500.00 for each Cause for Citation, based upon a determination that the above-described facts set forth above in Paragraphs 7, 9, 11, 13, 15, 17, and 19 each constitute a violation of BPC section 4825, as defined in BPC 4826, subdivision (b).
  - b) Respondent be cited for eight Class “C” violations in the amount of \$2,500.00 for each Cause for Citation, based upon a determination that the above-described facts set forth above in Paragraphs 8, 10, 12, 14, 16, 18, and 20 each constitute a violation of BPC section 4825, as defined in BPC 4826, subdivision (c).
  - c) Respondent be cited for a Class “C” violation in the amount of \$5,000.00 for the Cause for Citation, based upon a determination that the above-

described facts set forth above in Paragraph 21 constitute a violation of BPC section 4825, as defined in BPC 4826, subdivision (f).

38. In compliance with BPC sections 125.9 and 4875.2, and CCR, title 16, section 2043, subsection (e), the total penalty for the above violations is \$47,500.00. However, pursuant to BPC section 125.9(b)(3) in no event shall the administrative fine assessed by the Board exceed \$5,000.00. Therefore, total fine amount due to the Board is \$5,000.00.

**ORDER OF ABATEMENT**

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

2/17/2022  
DATE

SIGNATURE ON FILE  
JESSICA SIEFERMAN  
Executive Officer  
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 therefor and want to request an informal conference, you must, within 10 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).)