

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

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

**Patricia Zuniga, Unlicensed**

**Respondents**

**Citation No. 1819-22**

**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 reveal that Patricia Zuniga (“Respondent”) has never been issued a Veterinarian license.
3. The Board’s records reveal that Respondent has never been issued a premises permit.

**STATUTORY PROVISIONS**

4. Business and Professions Code (BPC) sections 125.9, 148, and 4875.2 and California Code of Regulations (CCR), title 16, section 2043 authorize the Executive Officer of the Board to issue citations containing orders of abatement assessments of civil penalty against a licensee of the Board, or to an unlicensed person, who has committed any acts or omissions in violation of the Veterinary Medicine Practice Act (Act).
5. BPC section 4825 provides that it is unlawful for any person to practice veterinary medicine or any branch thereof in this State unless at the time of so doing, such person holds a valid, unexpired, and unrevoked license as provided

in the Act. A person practices veterinary medicine, surgery, and dentistry, and the various branches thereof, when he or she performs any act set forth in BPC section 4826, including representing himself or herself as engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry in any of its branches.

6. BPC section 4853 requires all premises, including a building, kennel, mobile unit, or vehicle, where veterinary medicine, veterinary dentistry, veterinary surgery, and the various branches thereof are being practiced to be registered with the Board.
7. 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.

### **CAUSE FOR CITATION**

8. On the website, YouTube, the Respondent is seen in a video, "floating" a horse's teeth and castrating a stallion. Respondent represents herself as an Equine Vet with 12 years of experience and lists a number to call for veterinary services. The Board has not issued a license to practice veterinary medicine to Respondent. Such unlicensed conduct constitutes a violation of BPC sections 4825 and 4826, subdivisions (a), (d) and (f).
9. On or about November 5, 2014, Respondent represented herself as a veterinarian. Respondent diagnosed and euthanized a horse. Such unlicensed conduct constitutes a violation of BPC sections 4825 and 4826, subdivision (a).
10. On or about November 8, 2017, Respondent advertised herself as a veterinarian on the website, Facebook. Such unlicensed conduct constitutes a violation of BPC section 4826, subdivisions (a) and (f).
11. On or about July 4, 2010, Respondent was arrested for possessing Ketamine and other veterinary medicine. Such unlicensed conduct constitutes a violation of BPC section 4826 (c), of Health and Safety Code Section 11350 (a)(2).
12. On or about July 27, 2018, during an undercover investigation conducted by state investigators, Respondent agreed to examine, sedate and perform a castration on an equine patient. Respondent further indicated to the undercover officer that she was going to charge \$140 for the exam and \$290 for the castration procedure, per horse. In addition, Respondent also stated she would be available to examine and perform the procedures of any other horses, in need of care, at the stable. Such unlicensed conduct constitutes a violation of BPC section 4826, subdivisions (b), (c) and (d).
13. On or about July 27, 2018, Respondent agreed to examine, diagnose, sedate and perform procedures of an equine patient at an undisclosed location. The

Board has not issued a premises permit to Respondent. Respondent is not authorized to practice veterinary medicine at any location. Such practice of veterinary medicine constitutes a violation of BPC section 4853, subdivision (a).

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

14. Violations exist pursuant to BPC sections 4825 and 4826, subdivisions (a), (d) and (f). A cause of action thereby exists.
15. Violations exist pursuant to BPC sections 4825 and 4826, subdivision (a). A cause of action thereby exists.
16. Violations exist pursuant to BPC section 4826, subdivisions (a) and (f). A cause of action thereby exists.
17. Violations exist pursuant to BPC section 4826, subdivision (c), of Health and Safety Code Section 11350 (a)(2). A cause of action thereby exists.
18. Violations exist pursuant to BPC section 4826, subdivisions (b), (c) and (d). A cause of action thereby exists.
19. Violations exist pursuant to BPC section 4853, subdivision (a). A cause of action thereby exists.

**PENALTY**

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

Respondent be cited for a Class "C" violation in the amount of \$5,000 for the Cause for Citation, based upon a determination that the above-described facts constitute violations of BPC sections 4825 and 4826, subdivisions (a),(d) and (f).

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

Respondent be cited for a Class "C" violation in the amount of \$2,000 for the Cause for Citation, based upon a determination that the above-described facts constitute violations of BPC section 4826, subdivisions (a) and (f).

Respondent be cited for a Class "C" violation in the amount of \$5,000 for the Cause for Citation, based upon a determination that the above-described facts constitute violations of BPC section 4826, subdivision (c), of Health and Safety

Code Section 11350 (a)(2).

Respondent be cited for a Class "C" violation in the amount of \$5,000 for the Cause for Citation, based upon a determination that the above-described facts constitute violations of BPC section 4826, subdivisions (b), (c) and (d).

Respondent be cited for a Class "C" violation in the amount of \$2,000 for the Cause for Citation, based upon a determination that the above-described facts constitute violations of BPC section 4853, subdivision (a). A cause for action thereby exists.

21. In compliance with BPC sections 125.9 and 4875.2, and CCR section 2043, subdivision (c), the total penalty for the above violations is \$5,000.

**ORDER OF ABATEMENT**

The Board hereby orders Respondent to cease and desist from violating BPC sections 4825 and 4826, subdivision (a), (b), (c), (d) and (f); and 4853.

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.

March 27, 2020  
DATE

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