# In the Matter of the Petition for Modification of Probation of Susan Aviles

#### VETERINARY MEDICAL BOARD Case No: AA 2015 40 OAH No:

#### **Attorney General's Exhibits**

ATTORNEY GENERAL'S EXHIBIT NO.	DOCUMENT	MARKED	ADMIT
1	Notice of Hearing		
2	License History Certification		
3	Petition for Early Termination of Probation and Attachments in Support		
4	Stipulated Surrender of License and Order; Accusation Case No. AA 2015 40		

EXHIBIT 1



 BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
 GAVIN NEWSOM, GOVERNOR

 DEPARTMENT OF CONSUMER AFFAIRS
 VETERINARY MEDICAL BOARD

 1747 North Market Blvd., Suite 230, Sacramento, CA 95834-2987

 P (916) 515-5520
 Toll-Free (866) 229-6849
 www.vmb.ca.gov



June 10, 2020

Susie D. Aviles 3953 Alta Loma Drive Bonita, CA 91902

#### RE: HEARING NOTICE OAH Case No. TBD Petition for Reinstatement of License – Susie D. Aviles, RVT 6555 (Voluntary Surrendered)

Dear Ms. Aviles:

You are hereby notified that a hearing will be held before the Veterinary Medical Board, Department of Consumer Affairs:

NOTE: Pursuant to Governor Gavin Newsom's Executive Order N-29-20, issued on March 17, 2020, this hearing will be held by videoconference with no physical public locations. Instructions on how to participate are attached and can also be found on our website.

Date: July 2, 2020 Time: 10:30 am. Location (Videoconference link): <u>https://dca-ca.webex.com/dca-</u> ca/onstage/g.php?MTID=eb7192be440b87d77ae08444e3cf87074

The hearing will be conducted before the Veterinary Medical Board, Department of Consumer Affairs and an administrative law judge of the Office of Administrative Hearings, who will preside over the Petition for Reinstatement matter.

If you object to the petition being heard by videoconference, you must notify the presiding officer within ten (10) days after this notice is served on you. Failure to notify the presiding officer within ten (10) days will deprive you of a change in the place of hearing.

You may be present at the hearing. You have the right to be represented by an attorney at your own expense. You are not entitled to the appointment of an attorney to represent you at public expense. You are entitled to represent yourself without legal counsel. You may present any relevant evidence and will be given full opportunity to cross-examine all witnesses testifying against you. You are entitled to the issuance of subpoenas to compel the attendance of witnesses and the production of books, documents, or other things by applying to:

#### Office of Administrative Hearings Attn: General Jurisdiction 2349 Gateway Oaks, Suite 200 Sacramento CA 95833

**INTREPRETER**: Pursuant to section 11435.20 of the Government Code, the hearing shall be conducted in English language. If a party or party's witness does not proficiently speak or

understand the English language and before commencement of the hearing requests language assistance, an agency subject to the language assistance requirement in section 11435.15 of the Government Code shall provide a certified interpreter or an interpreter approved by the administrative law judge conducting the proceedings. The cost of providing the interpreter shall be paid by the agency having jurisdiction over the matter if the administrative law judge or hearing officer so directs, otherwise by the party for whom the interpreter is provided. If you or a witness requires the assistance of an interpreter, ample advance notice of this fact should be given to the Office of Administrative Hearings so that appropriate arrangements can be made.

**CONTINUANCES:** Under section 11524 of the Government Code, the agency may grant a continuance, but when an administrative law judge of the Office of Administrative Hearings has been assigned to the hearing, no continuance may be granted except by him or her or by the presiding judge for good cause. When seeking a continuance, a party shall apply for the continuance within 10 working days following the time the party discovered or reasonably should have discovered the event or occurrence which establishes good cause for the continuance. A continuance may be granted for good cause after the 10 working days have lapsed only if the party seeking the continuance is not responsible for and has made a good faith effort to prevent the condition or even establishing the good cause.

Please visit the Board's website at <u>www.vmb.ca.gov</u> to get a copy of the agenda or feel free to contact me at (916) 515-5244.

Sincerely,

Virginia Gerard

Virginia Gerard Probation Monitor

cc: Anahita Crawford, Deputy Attorney General Office of Administrative Hearings



BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY · GAVIN NEWSOM, GOVERNORDEPARTMENT OF CONSUMER AFFAIRS · VETERINARY MEDICAL BOARD1747 North Market Blvd., Suite 230, Sacramento, CA 95834-2978P (916) 515-5220Toll-Free (866) 229-0170www.vmb.ca.gov



#### **CERTIFICATION OF LICENSE HISTORY**

This is to certify that I, Robert Stephanopoulos, Enforcement Manager of the Veterinary Medical Board (Board), Department of Consumer Affairs, State of California, share the responsibility of maintaining control and custody of the official records of the Board. I made or caused to be made a diligent search of the files and records concerning the license history of Susie Del Castillo Aviles. I have determined that the official records prepared by Board employees, acting within the scope of their duties, show the dates and time periods listed herein for the issuance, expiration, periods of invalidity, and renewals of the license, as well as citations issued and periods of formal Board discipline:

#### RVT No. 6555:

Susie Del Castillo Aviles 3953 Alta Loma Drive Bonita, CA 91902

First Issued:	August 9, 2004
Expiration:	December 31, 2015
Status:	Voluntary Surrender

Discipline:

On June 30, 2016, a Decision became effective in the matter of the Accusation against Ms. Aviles filed on September 9, 2015, case number AA 2015 40. The Decision adopted the Stipulated Surrender of License and Order.

Given under my hand at Sacramento, California, this 8<sup>th</sup> day of June, 2020.

Robert Stephanopoulos, Enforcement Manager



 BUSINESS.CONSUMER SERVICES AND HOUSING AGENCY
 GAVIN NEWSOM, GOVERNOR

 DEPARTMENT OF CONSUMER AFFAIRS
 VETERINARY MEDICAL BOARD

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#### PETITION FOR REINSTATEMENT OR WIB/RVTC MODIFICATION OF PENALTY

**INSTRUCTIONS:** Please type or print neatly. All blanks must be completed; if not applicable enter N/A. If more space is needed attach additional sheets. Attached to this application should be a "Narrative Statement" and two original verified recommendations from a veterinarian licensed by the Board who has personal knowledge of activities since the disciplinary action was imposed.

TYPE OF P	ETITION [Reference Busine	ess and Professions Code s	ection 4887]				
Reinstatem	ent of Revoked/Surrendered License	or Registration Modificat	ion of Probation	ermination of Probation			
<b>NOTE:</b> A Petition for Modification and/or Termination of Probation can be filed together. If you are requesting Modification, you must specify in your "Narrative Statement" the term(s) and condition(s) of your probation that you want reduced or modified and provide an explanation. Please check all boxes above that apply.							
PERSONA	L INFORMATION						
NAME:	First Susie	Middle	Last Avi u				
	licensed under, if any:	STILLO					
HOME ADDR	ESS: Number & Street	City	State	Zip			
	PHONE NUMBER	WORK TELEPHONE NU	MBER CELL N	UMBER			
E-mail address	S:	CA Licen 65-3	se or Registration Numb うろ	er			
Are you license	ed by any other state(s) or countr	y(ies) (please include license n	umber(s), issue date(s), ar	nd status of license(s)):			
ATTORNEY	INFORMATION (If Applicab	le)					
Will you be re	presented by an attorney?	🚺 No 👘 🗌 Yes (If "Ye	s," please provide the fol	lowing information)			
NAME:							
ADDRESS:							
PHONE:							
DISCIPLIN	ARY INFORMATION						
	explanation in your "Narrative , self use of drugs or alcohol, ex						
	had your license revoked, susper y other state or country?	nded, voluntarily surrendered, de	enied, or placed on	No 🗌 Yes			
	brief cause for administrative a ordered (e.g., 5 years probatior		"Narrative Statement" se	-			
				AGO006			

VETERINARIAN/REGISTERED TECHNICIAN BACKGROUND Total number of years in veterinary practice: CONTINUING EDUCATION (List continuing education completed since the date of the disciplinary action) EASE ATTACHED CONTINUING EPUCATION SEE CERTIFICATES ... CURRENT OCCUPATION OTHER THAN VETERINARIAN OR REGISTERED VET TECHNICIAN (Answer only if currently not practicing as a Veterinarian or Registered Vet Technician) List employer, address, e-mail address, phone number, job title, and duties: TOSPITAL ( (619) 299-6020 ETERINARY -ABC PTOWN ORMAL STREET a/054 )ieono 92103 ETERINARY / ECHNII CIANI SSI STANT EMPLOYMENT HISTORY (list for the past 5 years only) Provide the employer's name, address, phone number, job title and dates of employment: 2-5571 (619) afat ETERINARY 7 BAST ET as bITAL GREENFIELD DR. 92021 EL CATONE, 1682 07/11/2017-04/19 2019 ETERINARY / ECHNICIAN 7 SSISTA REHABILITATION Describe any rehabiliative or corrective measures you have taken since your license/registration was disciplined. List dates, nature of programs or courses, and current status. You may include any community service or volunteer work. LEASE SEE ATTACHED REHABILITATION LETTER.

CURRENT COMPLIANCE		el <del>74 / 1</del>	<u></u>	
Since the effective date of your last Veterinary Medical Board disciplinary action have you:				94940-000-000 - 949 - 949 - 949 - 949 - 949 - 949 - 949 - 949 - 949 - 949 - 949 - 949 - 949 - 949 - 949 - 949 -
1. Been placed on criminal probation or parole?		Yes	X	No
2. Been charged in any pending criminal action by any state, local or federal agency or court?		Yes	$\mathbf{X}$	No
<ol><li>Been convicted of any criminal offense? (A conviction includes a no contest plea; disregard traffic offenses with a \$100 fine or less.)</li></ol>		Yes	X	No
4. Been charged or disciplined by any other veterinary board?		Yes	X	No
5. Surrendered your license to any other veterinary board?		Yes	$\mathbf{X}$	No
6. Had your licensee manager's premise permit disciplined?		Yes	X	No
7. Had any civil malpractice claims filed against you of \$10,000 or more?		Yes	$\bowtie$	No
8. Become addicted to the use of narcotics or controlled substances?		Yes	لک ا	No
9. Become addicted to or received treatment for the use of alcohol?		Yes	$\boxtimes$	No
10. Been hospitalized for alcohol or drug problems or for mental illness?		Yes	X	No
COST RECOVERY         Was cost recovery ordered?         No         X         Yes         If yes, what is the remaining balance?	, fs	2.5	00.	60
When is payment anticipated? Upon IZEIN STATEMENT OF LICENSE		$\lambda_{j}$	<u> </u>	<u> </u>
DECLARATION				
Executed on April 22 20 20, at BONITA	-	<del>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</del>	0	r
(City)			(Sta	te)
I declare under penalty of perjury under the laws of the State of California that the correct and that all statements and documents attached in support of this petition			-	
Susie D. Avices Signature	))	<u> </u>		
The information in this document is being requested by the Veterinary Medical Board (Board) professions Code section 4887. In carrying out its licensing or disciplinary responsibilities, the information to make a determination on your petition for reinstatement or modification of penalty access the Board's records containing your personal information as defined in Civil Code section Custodian of Records is the Executive Officer at the address shown on the first page.	Boa /. Yo	rd requi ou have	ires thi a righi	is
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#### Veterinary Medical Board Registered Veterinary Technician Petition for Reinstatement Rehabilitation Letter

April 22, 2020

After serving my conviction with community service (50 hours), a 5-year probation (June 22, 2015) to the court, and a 1-year probation (June 30, 2016) with the Veterinary Medical Board, I decided to start my life over.

I have learned from my previous mistakes, due to the lack of knowledge and experience in the roofing business, so I made the smart decision by giving up the family roofing company. I have focused all of my time and efforts to pursue my career as licensed veterinary technician, so I found a part time job at a veterinary hospital as a veterinary assistant, but not without extreme difficulties. I suffer terribly from rheumatoid arthritis, a debilitating disease, I acquired at 15-years of age. Though I suffered so much in my life with this disease due to constant excruciating pain, my love and passion in the veterinary medical, kept me going and never giving up. I started my first job as a kennel aid at the age of 16. Then, I started to train as a veterinary assistant for veterinary technicians and Veterinarians. At that time, I did not know that veterinary schools accommodated people with disabilities, so I decided to go in the other direction and become a Registered Veterinary Technician. So, I enrolled at San Diego Mesa College and received my Associates of Science Degree in Animal Health Technology. After graduating from school, I signed up to take my State Board Exams in Sacramento, CA. After I received my exam results from the VMB, stating that I passed, I cried. It was the happiest day of my life, because the program and state exams were not easy.

After I surrendered my RVT license, I continued taking continuing education classes to stay current. My passion for always wanting to learn, says a lot about who I am as a person. I currently work for ABC Veterinary Hospital Uptown in San Diego, CA, as a veterinary technician assistant. I love taking care of my patients, and helping my coworkers who are new to the veterinary field. I believe that I am an important asset to the Veterinary Medical field.

But I have accepted if the Veterinary Medical Board does not grant and reinstate my license, then I will continue working in the field as a veterinary assistant. But if given the opportunity for a second chance, then I would like to further my education and major as a VTS in Anesthetic and Analgesia, as long as my health permits.

I thank the Veterinary Medical Board for allowing me to have the opportunity to request to have my license reinstated as a Registered Veterinary Technician in the state of California.

Sincerely,

Susie D. Aviles, License #6555

03/24/2020

Dr Laura E. Kosmo, DVM 13867 Otis Place Poway, CA, 92064 (805) 570-9821 laurakosmodvm@yahoo.com

Re: Letter of Recommendation for Susie Aviles

To whom it may concern:

This is a recommendation to the Veterinary Medical Board in support of my colleague, Susie Aviles. Susie is applying to have her Registered Veterinary Technician license reinstated after serving the probationary period against her license. I have worked with Mrs Aviles for the past 2 years as a relief veterinarian at Bastet Veterinary Hospital and an associate veterinarian at ABC Veterinary Hospital in San Diego, California. During this time, I have come to know Susie not only on a professional level but on a personal level as well.

Susie has shared with me regarding her previous career of managing a family roofing business and the legal issues she had experienced because of it. Due to these issues, Susie felt compelled to surrender her license to the Board instead of awaiting revocation and further disciplinary action. She took responsibility for her actions, completed her sentence, and learned from her transgression. Since then, Susie has given up her business to focus on her true passion in veterinary medicine by working full time and completing all the requirements needed to reinstate her RVT license.

Susie has worked primarily as a surgery and nursing care technician who is responsible for performing anesthesia, caring for critically ill patients, and assisting with emergency and surgical procedures. She has also contributed as a customer service representative and veterinary assistant mentor to our externs and demonstrated excellent communication and interpersonal skills. Her consistent professionalism, work ethic, technical skills, compassion, integrity, and accountability have made her an exemplary employee and invaluable asset to my hospitals.

I strongly urge the Veterinary Medical Board to consider reinstating Mrs Aviles' license and grant her full authority to work again as a Registered Veterinary Technician.

If you have any questions or concerns regarding this matter please feel free to contact me via the information provided above.

"I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct"

Sincerely, Laurat. Kojno, DM

Laura E. Kosmo, DVM

# APR 27 2020

March 15, 2020

To Whom It May Concern:



I am delighted to be called upon as a reference for Susie Aviles. I worked with Susie for approximately 1 year at Bastet Animal Hospital in El Cajon, California, where I have been working as a relief doctor for the past 1 year and 9 months.

I would like to express my respect and appreciation for this bright person, who brought outstanding contribution to the work and patient care of this hospital. I am aware of the situation in which Susie Aviles had run into legal problems with her previous roofing company. Due to these complications, Susie surrendered her California Registered Veterinary Technician License, #6555, to the California Veterinary Medical Board as a token of good faith, as opposed to having it revoked.

Susie possesses extreme integrity, she is dependable and she pays careful attention to detail. She is strong willed and determined. She is constantly evaluating her patient's status and treatment protocol's, in order to make appropriate and excellent clinical decisions for her patients. I have watched as Susie's knowledge of veterinary medicine, anesthesia and surgery has grown over the past few years. She has a system of checks and balances, which has proven very effective in decreasing medical or treatment errors. She has more than once, noticed and addressed inaccurate medical directions or calculations from her fellow nursing staff, and even doctors, myself included.

Every single day, Susie approaches her work in the field of veterinary medicine with integrity and compassion. She strongly adheres to moral and ethical principles and has an extreme soundness of character. She is an excellent communicator with her support staff and our clients and always presents herself in a collected and professional matter, all the while emanating compassion and love for her co-workers and patients. Susie is extremely efficient and is always focused on working and getting the job done well.

I strongly support the recommendation that Susie Aviles have her California Veterinary Technician license reinstated. She will be a valuable addition to the veterinary field as a licensed veterinary technician.

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

Please feel free to contact me with any questions or concerns.

Selena Savides DVM CA license 18119 Savides Veterinary Services 9430 Gregory St. La Mesa, CA. 91942 1-619-201-0480

#### savidesveterinary@gmail.com

#### **REQUEST FOR LIVE SCAN SERVICE**

	Print Form Reset Form
Applicant Submission	
A0133 ORI (Code assigned by DOJ) Veterinarian/Veterinary Tech	License/Registration Authorized Applicant Type APR 27 2020
Type of License/Certification/Permit <u>OR</u> Working Title (Maximum 30 characters -	if assigned by DOJ, use exact title assigned)
Contributing Agency Information: Veterinary Medical Board Agency Authorized to Receive Criminal Record Information 1747 N. Market Blvd., Ste. 230	06386 Mail Code (five-digit code assigned by DOJ)
Street Address or P.O. Box         Sacramento       CA       95834         City       State       ZIP Code         Applicant Information:       CA       1000000000000000000000000000000000000	Contact Name (mandatory for all school submissions) (916) 515-5220 Contact Telephone Number
Aviles       Last Name       Other Name       (AKA or Alias)	Susie     D       First Name     Middle Initial     Suffix       Susie     Suffix       First     Suffix
Date of Birth       Sex       Male       Female         5'1"       120       Hazel       Brown         Height       Weight       Eye Color       Hair Color         CA       Social Security Number	Driver's License Number Billing Number Applicant Must Pay (Agency Billing Number) Misc. Number (Other Identification Number)
Home N/A Address Street Address or P.O. Box	N/A City N/A N/A State N/A ZIP Code
Your Number: N/A OCA Number (Agency Identifying Number)	Level of Service: X DOJ X FBI
If re-submission, list original ATI number: (Must provide proof of rejection)	Original ATI Number
Employer (Additional response for agencies specified by statute): N/A Employer Name N/A Street Address or P.O. Box	N/A Mail Code (five digit code assigned by DOJ
N/A N/A City State N/A ZIP Code	Telephone Number (optional)
Live Scan Transaction Completed By: M. MONHOIVO Name of Operator M. P. M. S. M. S	Date G113AVSG14 ATI Number ATI Number AG0013



VILES

RACE-approved for: Veterinarians and veterinary technicians

Awarded to:

APR 27 2020

Participant Name:

Participant signature:

State(s) and License Number:

#### For Attending:

Webinar Title/Topic:

Speaker: Date: Method of delivery: Subject Matter/Category/Contact Hours: Max Number of CE Hours: Neo-Poly-BAC to the Future: The Next Generation of Essential Eye Meds Dr. Shelby Reinstein, DACVO April 22, 2020 Interactive Broadcast Satellite or Web Conference Medical/2 2

#### Presented By:

PROVIDER NAME:
PROVIDER EMAIL & WEBSITE:
PROVIDER ADDRESS:
RACE PROVIDER #:
RACE PROGRAM #:

VETgirl, LLC info@vetgirlontherun.com\_www.vetgirlontherun.com PO BOX 16504, Saint Paul, MN 55116 785 38777

#### Authorized By:

Signature:

Justine A. Lee, DVM, DACVECC, DABT

DAVLEC ,DABT

SECTING DALVELL

Garret Pachtinger, VMD, DACVECC

This program (RACE program number 785-38777) is approved by the AAVSB RACE to offer a total of 2 CE credits with a maximum of 2 CE credits being available to any individual veterinarian or veterinary technician/technologist. This RACE approval is for the subject matter category of Medical using the delivery method of Interactive Broadcast Satellite or Web Conference. This approval is valid in jurisdictions which recognize AAVSB RACE; however participants are responsible for ascertaining each board's CE requirements. Contact your state board to verify if you have any questions. VETgirl is also approved as a provider of veterinary CE in the state of New York.

AGO014

Awarded to:

Name:Susie Aviles State(s) of Licensure License#(s) 6555

For attending the:

Dog Beach Dentistry Specialists Update

Online On: 4/16/2020

Covering: Dental Emergencies Presented by:

#### Dog Beach Dentistry

P. O. Box 99, Tustin, CA 92781 AAVSB Race Program # 39781 AAVSB RACE Provider # 123

Authorized by:\_\_\_\_

Brook A. Niemiec, DVM

Brook A. Niemiec, DVM, DAVDC, DEVDC, FAVD

"This program (RACE program number) is approved by the AAVSB RACE to offer a total of 2 CE Credits, with a maximum of 2 CE Credits being available to any individual veterinarian or veterinary technician/technologist. This RACE approval is for the subject matter categories of dentistry using the "interactive" method. This approval is valid in jurisdictions which recognize AAVSB RACE; however, participants are responsible for ascertaining each board's CE requirements."



This is to certify that on 19th April 2020 Susie Aviles

6000 A C

State and License numbe Signature

Completed the program: Think Anesthesia: Alfaxalone in the Emergency Room 1 CE Credit - Non-interactive Distance Learning

Jurox Inc. RACE Provider 931

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Kirby Pasloske, BSc, DVM, DVSc, DACVCP, MANZCVSc RACE Co-ordinator

thinkanesthesia.education

This prógram 931-39283 has been approved for 1 hour of continuing education credit in jurisdictions that recognize RACE approval for veterinarians and veterinary technicians as a medical program provided by Jurox Inc.



1321 Burlington Street Suite D North Kansas City MO 64116 USA



RACE-approved for: Veterinarians and veterinary technicians

#### Awarded to:

Participant Name:

Participant signature:

State(s) and License Number:

65.5.5

#### For Attending:

Webinar Title/Topic:

Speaker: Date: Method of delivery: Subject Matter/Category/Contact Hours: Max Number of CE Hours: Veterinary technicians: The key to clinic infection control and protecting patients from disease Dr. Jason Stull, VMD, PhD, DACVPM April 19, 2020 Interactive Broadcast Satellite or Web Conference Medical/1 1

#### Presented By:

PROVIDER NAME: PROVIDER EMAIL & WEBSITE: PROVIDER ADDRESS: RACE PROVIDER #: RACE PROGRAM #:

VETgirl, LLC info@vetgirlontherun.com www.vetgirlontherun.com PO BOX 16504, Saint Paul, MN 55116 785 39107

#### Authorized By:

Signature:

C, DAGLEC, DAST

Justine A. Lee, DVM, DACVECC, DABT

400 VALVELL

Garret Pachtinger, VMD, DACVECC

This program (RACE program number 785-39107) is approved by the AAVSB RACE to offer a total of 1 CE credit with a maximum of 1 CE credit being available to any individual veterinarian or veterinary technician/technologist. This RACE approval is for the subject matter category of Medical using the delivery method of Interactive Broadcast Satellite or Web Conference. This approval is valid in jurisdictions which recognize AAVSB RACE; however participants are responsible for ascertaining each board's CE requirements. Contact your state board to verify if you have any questions. VETgirl is also approved as a provider of veterinary CE in the state of New York.

AGO017



#### Susie Aviles

Each lecture is 50 minutes long and provides one hour of CE credit. Labs, Workshops, and Lunch & Learns are recorded by clock hours. Please check with your respective state regarding the acceptance of hours spent inside the Exhibit Hall for continuing education credit. This document is for your personal records and is not reported to RACE by WVC.

Please contact WVC at info@wvc.org or call 866-800-7326 if you have any questions regarding sessions not already indicated in your My Record, such as Hands-on Labs, Lunch & Learns, and Workshops.

Code	Session	Date	Start	End	CE Credits
VT29	Emergency Anesthesia in the Cardiac Patient	February 17, 2019	2:00 pm	2:50 pm	1
VT30	Pharmacology of Cardiac Medications	February 17, 2019	3:00 pm	3:50 pm	1
VT01	Anesthesia & Analgesia Case Studies	February 18, 2019	7:30 am	8:20 am	1
VT02	Hypothermia During the Intra-operative & Post-operative Periods	February 18, 2019	8:30 am	9:20 am	1
VT03	Understanding Capnography	February 18, 2019	10:30 am	11:20 am	1
VT04	Anesthesia for the Dentistry Patient	February 18, 2019	11:30 am	12:20 pm	1
VT13	Say Ahhhh! Oral Examination & Charting	February 18, 2019	2:00 pm	2:50 pm	1
VT14	Dirty Mouth? Clean It Up! A Complete Periodontal Cleaning	February 18, 2019	3:00 pm	3:50 pm	1
VT12	What Do I Do with My Tech License? Veterinary Technology as a Career	February 18, 2019	6:00 pm	6:50 pm	1
VT21	The Veterinary Nurse's Critical Patient Checklist	February 19, 2019	7:30 am	8:20 am	1
VT23	Not so Cute: Acute Anaphylaxis	February 19, 2019	10:30 am	11:20 am	1
VT24	Multi-parameter Monitoring: The Technician's Tools	February 19, 2019	11:30 am	12:20 pm	1
VT17	Just Breathe: Respiratory Emergencies	February 19, 2019	2:00 pm	2:50 pm	1
VT18	Shock Has Two Faces: The Keys to Perfusion	February 19, 2019	3:00 pm	3:50 pm	1
VT19	Shock Has Two Faces: RBCs & Anemia	February 19, 2019	5:00 pm	5:50 pm	1
VT20	Evidence-based CPR: The RECOVER Guidelines	February 19, 2019	6:00 pm	6:50 pm	1

Code	Session	Date	Start	End	CE Credits
VT53	Technician Orthopedic Evaluations & Common Conditions	February 20, 2019	7:30 am	8:20 am	1
VT58	So Radl Positioning for Safety & Success in the Radiology Suite!!	February 20, 2019	8:30 am	9:20 am	1
	······			E Credits	* 18

AGO019

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Susie Aviles, RVT 3953 Alta Loma Dr Bonita, CA 91902-1005 United States

> WVC 91st Annual Conference February 17-20, 2019

AAVSB-RACE Provider #3-35526 40 CE hours of Veterinary Technicians Continuing Education were presented via lectures and interactive sessions by WVC in Las Vegas, NV

State of Licensure	CA	License #(s)	655	5
Signature	9D		Date	2/17/2019

This program 3-35526 is approved by the AAVSB RACE to offer a total of 899.00 CE Credits (48.00 max) being available to any one veterinarian: and/or 878.00 Veterinary Technician CE Credits (40.00 max). This RACE approval is for the subject matter categorie(s) of:

Medical Program Non-Medical Program

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Anthony Pease, DVM, MS, DACVR Chief Veterinary Medical Officer WVC





Susie Aviles, RVT 3953 Alta Loma Dr Bonita, CA 91902-1005 United States

> WVC 91st Annual Conference February 17-20, 2019

AAVSB-RACE Provider #3-35526 40 CE hours of Veterinary Technicians Continuing Education were presented via lectures and interactive sessions by WVC in Las Vegas, NV

State of Licensure	CA	License #(s)	6555
Signature	A O		Date 2/17/2019

This program 3-35526 is approved by the AAVSB RACE to offer a total of 899.00 CE Credits (48.00 max) being available to any one veterinarian: and/or 878.00 Veterinary Technician CE Credits (40.00 max). This RACE approval is for the subject matter categorie(s) of:

Medical Program Non-Medical Program

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Anthony Pease, DVM, MS, DACVR Chief Veterinary Medical Officer WVC





Susie Aviles, RVT 3953 Alta Loma Dr Bonita, CA 91902-1005 United States

> WVC 91st Annual Conference February 17-20, 2019

AAVSB-RACE Provider #3-35526 40 CE hours of Veterinary Technicians Continuing Education were presented via lectures and interactive sessions by WVC in Las Vegas, NV

State of Licensure	CA	License #(s)	6555
Signature	90		Date 2/18/2019

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Medical Program Non-Medical Program

la

Anthony Pease, DVM, MS, DACVR Chief Veterinary Medical Officer WVC





Susie Aviles, RVT 3953 Alta Loma Dr Bonita, CA 91902-1005 United States

> WVC 91st Annual Conference February 17-20, 2019

AAVSB-RACE Provider #3-35526 40 CE hours of Veterinary Technicians Continuing Education were presented via lectures and interactive sessions by WVC in Las Vegas, NV

State of Licensure	CA	License #(s)	6555	ł
Signature	AO		Date	18/2019

This program 3-35526 is approved by the AAVSB RACE to offer a total of 899.00 CE Credits (48.00 max) being available to any one veterinarian: and/or 878.00 Veterinary Technician CE Credits (40.00 max). This RACE approval is for the subject matter categorie(s) of:

Medical Program Non-Medical Program

la

Anthony Pease, DVM, MS, DACVR Chief Veterinary Medical Officer WVC





Susie Aviles, RVT 3953 Alta Loma Dr Bonita, CA 91902-1005 United States

> WVC 91st Annual Conference February 17-20, 2019

AAVSB-RACE Provider #3-35526 40 CE hours of Veterinary Technicians Continuing Education were presented via lectures and interactive sessions by WVC in Las Vegas, NV

State of Licensure	CA	License #(s)	6225
Signature	0.0		Date 2/18/2019

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February 17-20, 2019

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State of Licensure	CA	License #(s)	6555	1
Signature	90		Date/	18/2019

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State of Licensure	CA	License #(s)	6555		
Signature	9-0		Date		

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Signature	90		Date 2	418/2019	

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State of Licensure	CA	License #(s)	6.7.5.5		
Signature	30		Date _2/18/2019		

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State of Licensure	CA	License #(s)	6555	
Signature			Date 2/19/201	9

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State of Licensure	CA	License #(s)	6000		
Signature	$(A \circ)$		Date	2/19/2019	

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State of Licensure	CA	License #(s)	6.555		
Signature	Q Q		Date	2/19/2019	

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State of Licensure	CA	License #(s)	6555		
Signature			Date	2/19	2019

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State of Licensure	CA	License #(s)	6550	5
Signature	30		Date	2/19/2019

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State of Licensure	CA	License #(s)	6555		
Signature	Q		Date	2/19/	2019

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State of Licensure	CA	License #(s)	6555	
Signature	(2, 0)		Date 2/19	2019

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Medical Program Non-Medical Program

using the delivery method(s) of: Seminar/Lecture, Lab/Wet Lab. This approval is valid in jurisdictions which recognize AAVSB RACE; however, participants are responsible for ascertaining each board's CE requirements. RACE does not "accredit" or "endorse" or "certify" any program or person, nor does RACE approval validate the content of the program.

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Signature	Q		Date	2/20	2019

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State of Licensure	CA	License #(s)	653	55	
Signature	() ()		Date	2/20	12019

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Anthony Pease, DVM, MS, DACVR Chief Veterinary Medical Officer WVC





Ceva Animal Health and the San Diego County VMA

Invite you to a 1.5 CE Dinner Meeting, Wed. July 11<sup>th</sup>

Speaker: Craig Prior BVSC, CVJ President of the Companion Animal Parasite Council (CAPC)

### <u>Title: 'Lead the Way and Save More Lives:</u> <u>Using Innovation and Big Data to Protect Your</u> <u>Patients and Your Practice'</u>

This lecture will focus on the many Vector Bourne Diseases we are seeing in this country, how they are spreading, and what it means for San Diego, specifically...

When: <u>Wed, July 11<sup>th</sup> 2017. Meeting starts @ 7:00pm</u> (Registration and Happy Hour 6:00-7:00pm)

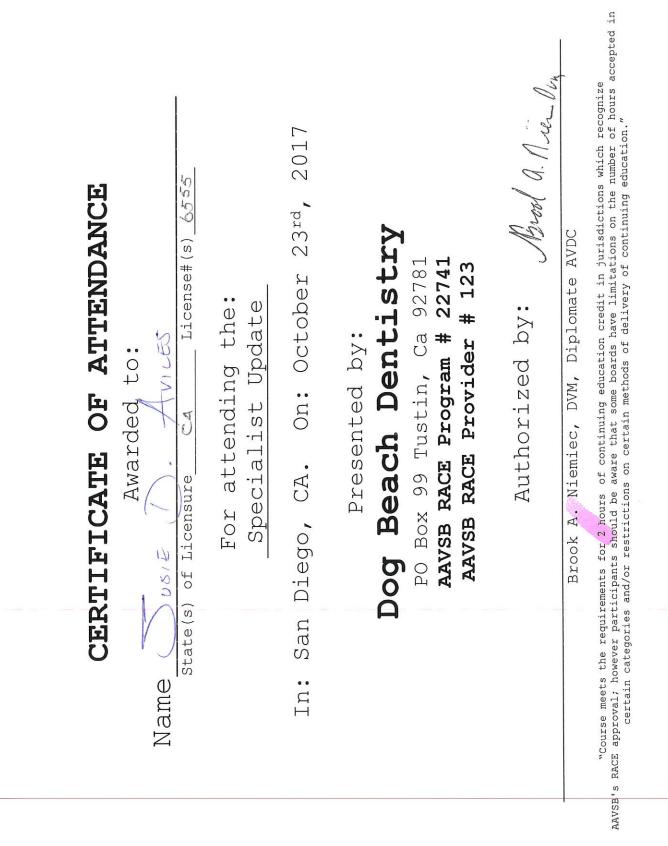
Where: <u>The Butcher Shop Steakhouse</u> 5255 Kearny Villa Rd. San Diego, CA 92123 (858) 565.2272

\*Please email/ call your RSVP in with food choice by Mon July 9th to:

Craig Bender: <u>619.884.1723</u> or <u>Craig.Bender@Ceva.com</u> Food Choice: Filet Mignon, Salmon, or Vegan.

\*Due to limited space, this meeting is for: Vets and SDCVMA Members

CERTIFICATE OF ATTENDANCE Awarded To:	
Name: D. AVILES	
State(s) of Licensure:	
License #(s): 6555	
For Attending:	
Program Title:	
Location (City, State): La Mesa, CA	
Date: April 17, 2018	
CE hours per Subject Matter Category(ies) : Method(s) of Delivery          1.5 hrs Scientific       Seminar/Leo	
Presented By:	
Provider Name:	
ProviderAddress: Dechra Veterinary Products, Overland Park, KS	
RACE Provider#: 495	
RACE Program #:495-32235	
Authorized By: Signature:	
The program 495-32235 is approved by the AAVSB RACE to offer a total of 1.50 CE Credits (1.50 max) by veterinarian: and/or 1.50 Veterinary Technician CE Credits (1.50) max). This RACE approval is for the su Category One: Scientific using the deliver method of Seminar/Lecture. This approval is valid in jurisdiction: RACE; however, participants are responsible for ascertaining each board's CE requirement. RACE does not content of any portion or "certify" any program of person, nor does RACE approval validate the content of any posterior.	bject matter category of: s which recognize AAVSB not "accredit" or "endorse"



AGO040

Awarded to

VILES USIE

Technician Appreciation & Continuing Education Dinner Event for attendance at the

on September 28th, 2017

Endocrine Disease in the General Practice Setting" "Addison's, Cushing's and Diabetes...Oh MY! Alyse Zacuto, DVM, DACVIM

"Disasters Gone Right! - A Crash Course in ER Conundrums" Teresa Kaiser, DVM

Presented by



5232 Jackson Drive Jackson Square Ctr. La Mesa, Ca. 91941 Stes 102-105

AGO04

Frank T. Parrish, - Program Coordinator avial

Pet Emergency & Specialty Center

	Sponsor:	C.E. Credit:	Location:	Topic:	Speaker:	Date:	Meeting:	Address:	Attendee:	SAN DIECC
· ·	Ceva Animal Heath	1.5 CEUs	Butcher Shop Steakhouse, San Diego, CA	Lead the Way & Save More Lives: Using Innovation & Big Data to Protect Your Fatients & Four Vector Bourne Disease Prevention	Craig Prior, BVSC, CVI, President of the Companion Animal Parasite Council (UAPC)	Wednesday July 11, 2018	Dinner and CE		Susie D. Avices	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 Certificate of Continuing Education Attendance SDCVMA is a CA statutorily approved CE provider
					Practice					

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AG0043

Awarded to

COSIM くいの

for attendance at the Technician Appreciation & Continuing Education Dinner Event

on September 20th, 2018

Mike Serdy, BVSc, Diplomate ACVS "Temporary Tracheostomies in Dogs"

Stephanie Leone, RVT, BS "What Do You Mean I Can't Eat This?"

Presented by



5232 Jackson Drive Stes 102-105 Jackson Square Ctr. La Mesa, Ca. 91941

Frank T. Parrish, - Program Coordinator Pet Emergency & Specialty Center

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

In the Matter of the Accusation Against:

Case No. AA 2015 40

OAH No. 2015120566

### SUSIE DEL CASTILLO AVILES 3953 Alta Loma Drive Bonita, CA 91902

Registered Veterinary Technician License No. TEC 6555

Respondent.

### DECISION AND ORDER

The attached Stipulated Surrender of License and Order is hereby adopted by the

Veterinary Medical Board, Department of Consumer Affairs, as its Decision in this matter.

3,2016

This Decision shall become effective on Quee 30, 2016.

It is so ORDERED \_ May

FOR'THE

FOR'THE VETERINARY MEDICAL BOARD DEPARTMENT OF CONSUMER AFFAIRS

Kamala D. Harris		
Attorney General of California JAMES M. LEDAKIS		
Supervising Deputy Attorney Gene DIANE DE KERVOR	eral	
Deputy Attorncy General State Bar No. 174721		
600 West Broadway, Suite 1800 San Diego, CA 92101		
P.O. Box 85266 San Diego, CA 92186-5266		
Telephone: (619) 645-2611 Facsimile: (619) 645-2061		
Attorneys for Complainant		
VETE	BEFORE THE ERINARY MEDICAL B	NARD
DEPART	MENT OF CONSUMER STATE OF CALIFORNI	AFFAIRS
In the Matter of the Accusation Aga	ainst: Case No. A.	A 2015 40
SUSIE DEL CASTILLO AVILES		
3953 Alta Loma Drive Bonita, CA 91902		ED SURRENDER OF
Registered Veterinary Technician	LICENSE	AND ORDER
No. TEC 6555	I ERCUSE	
F	Respondent.	
IT IS HEREBY STIPULATE	D AND AGREED by and	between the parties to the above-
entitled proceedings that the following	ing matters are true:	
	PARTIES	
1. Annemarie Del Mugnaio	o (Complainant) is the Exe	ecutive Officer of the Veterinary
Medical Board. She brought this act	tion solely in her official c	apacity and is represented in this
matter by Kamala D. Harris, Attorne	ey General of the State of (	California, by Diane De Kervor,
Deputy Attorney General.		· · · · · ·
2. Susie Del Castillo Aviles	s (Respondent) is represen	ted in this proceeding by Attorney
Steven A. Elia, whose address is 222	21 Camino Del Rio S., Sui	te 207, San Diego, CA 92108.
3. On or about August 9, 20	004, the Veterinary Medic	al Board issued Registered
Veterinary Technician License No. 7	TEC 6555 to Susie Del Ca	stillo Aviles (Respondent). The

Stipulated Surrender of License (Case No. AA 2015 40)

1	Registered Veterinary Technician License was in full force and effect at all times relevant to the
2	charges brought in Accusation No. AA 2015 40 and expired on December 31, 2015.
3	JURISDICTION
4	4. Accusation No. AA 2015 40 was filed before the Veterinary Medical Board (Board),
5	Department of Consumer Affairs, and is currently pending against Respondent. The Accusation
6	and all other statutorily required documents were properly served on Respondent on September 9,
7	2015. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of
8	Accusation No. AA 2015 40 is attached as Exhibit A and incorporated by reference.
9	ADVISEMENT AND WAIVERS
10	5. Respondent has carefully read, fully discussed with counsel, and understands the
11	charges and allegations in Accusation No. AA 2015 40. Respondent also has carefully read, fully
12	discussed with counsel, and understands the effects of this Stipulated Surrender of License and
13	Order.
14	6. Respondent is fully aware of her legal rights in this matter, including the right to a
15	hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at
16	her own expense; the right to confront and cross-examine the witnesses against her; the right to
17	present evidence and to testify on her own behalf; the right to the issuance of subpoenas to
18	compel the attendance of witnesses and the production of documents; the right to reconsideration
19	and court review of an adverse decision; and all other rights accorded by the California
20	Administrative Procedure Act and other applicable laws.
21	7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
22	every right set forth above.
23	CULPABILITY
24	8. Respondent admits the truth of each and every charge and allegation in Accusation
25	No. AA 2015 40, agrees that cause exists for discipline and hereby surrenders her Registered
26	Veterinary Technician License No. TEC 6555 for the Board's formal acceptance.
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Stipulated Surrender of License (Case No. AA 2015 40)

9. Respondent understands that by signing this stipulation she enables the Board to issue an order accepting the surrender of her Registered Veterinary Technician License without further process.

### **CONTINGENCY**

This stipulation shall be subject to approval by the Veterinary Medical Board. 10. 5 Respondent understands and agrees that counsel for Complainant and the staff of the Veterinary 6 Medical Board may communicate directly with the Board regarding this stipulation and surrender, 7 without notice to or participation by Respondent or her counsel. By signing the stipulation, 8 Respondent understands and agrees that she may not withdraw her agreement or seek to rescind 9 the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt 10 this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be 11 of no force or effect, except for this paragraph, it shall be inadmissible in any legal action 12between the parties, and the Board shall not be disqualified from further action by having 13 considered this matter. 14

15 11. The parties understand and agree that Portable Document Format (PDF) and facsimile
16 copies of this Stipulated Surrender of License and Order, including Portable Document Format
17 (PDF) and facsimile signatures thereto, shall have the same force and effect as the originals.

18 12. This Stipulated Surrender of License and Order is intended by the parties to be an 19 integrated writing representing the complete, final, and exclusive embodiment of their agreement. 20 It supersedes any and all prior or contemporaneous agreements, understandings, discussions, 21 negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order 22 may not be altered, amended, modified, supplemented, or otherwise changed except by a writing 23 executed by an authorized representative of each of the parties.

13. In consideration of the foregoing admissions and stipulations, the parties agree that

the Board may, without further notice or formal proceeding, issue and enter the following Order:

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Stipulated Surrender of License (Case No. AA 2015 40)

AGO048

### <u>ORDER</u>

IT IS HEREBY ORDERED that Registered Veterinary Technician License No. TEC 6555, issued to Respondent Susie Del Castillo Aviles, is surrendered and accepted by the Veterinary Medical Board.

The surrender of Respondent's Registered Veterinary Technician License and the
 acceptance of the surrendered license by the Board shall constitute the imposition of discipline
 against Respondent. This stipulation constitutes a record of the discipline and shall become a part
 of Respondent's license history with the Veterinary Medical Board.

9 2. Respondent shall lose all rights and privileges as a registered veterinary technician in
10 California as of the effective date of the Board's Decision and Order.

Respondent shall cause to be delivered to the Board her pocket license and, if one was
 issued, her wall certificate on or before the effective date of the Decision and Order.

4. If Respondent ever files an application for licensure or a petition for reinstatement in
the State of California, the Board shall treat it as a petition for reinstatement. Respondent must
comply with all the laws, regulations and procedures for reinstatement of a revoked license in
effect at the time the petition is filed, and all of the charges and allegations contained in
Accusation No. AA 2015 40 shall be deemed to be true, correct and admitted by Respondent
when the Board determines whether to grant or deny the petition.

19 5. Respondent shall pay the agency its costs of investigation and enforcement in the
20 amount of \$2,500.00 prior to issuance of a new or reinstated license.

6. If Respondent should ever apply or reapply for a new license or certification, or
petition for reinstatement of a license, by any other health care licensing agency in the State of
California, all of the charges and allegations contained in Accusation, No. AA 2015 40 shall be
deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of
Issues or any other proceeding seeking to deny or restrict licensure.

7. Respondent shall not apply for licensure or petition for reinstatement for one (1) year
from the effective date of the Board's Decision and Order.

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Stipulated Surrender of License (Case No. AA 2015 40)

1	ACCEPTANCE
2	I have carefully read the above Stipulated Surrender of License and Order and have fully
3	discussed it with my attorney, Steven A. Elia. I understand the stipulation and the effect it will
4	have on my Registered Veterinary Technician License. I enter into this Stipulated Surrender of
5	License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the
6	Decision and Order of the Veterinary Medical Board.
7	DATED: $\frac{4}{10}\frac{16}{16}$
8	SUSIE DEL CASTILLO AVILES Respondent
9	I have read and fully discussed with Respondent Susie Del Castillo Aviles the terms and
10	conditions and other matters contained in this Stipulated Surrender of License and Order. I
11 -	approve its form and content.
12	DATED: 4/13/20/6
13	STEVEN A. ELIA Attorney for Respondent
. 14	
15	ENDORSEMENT
16	The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted
17	for consideration by the Veterinary Medical Board of the Department of Consumer Affairs.
18	Dated: 4/19/2010 Respectfully submitted,
19	KAMALA D. HARRIS Attorney General of California
20	JAMES M. LEDAKIS Supervising Deputy Attorney General
21	4 I all AN (MOD)
22	DANE DE KERVOR
23 24	Deputy Attorney General Autorneys for Complainant
24	
26	SD2015801224 81297257.docx
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Stipulated Surrender of License (Case No. AA 2015 40)

### Exhibit A

Accusation No. AA 2015 40

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		~		
1 2 3 4 5 6 7 8	KAMALA D. HARRIS Attorney General of California LINDA K. SCHNEIDER Senior Assistant Attorney General JAMES M. LEDAKIS Supervising Deputy Attorney General State Bar No. 132645 600 West Broadway, Suite 1800 San Diego, CA 92101 P.O. Box 85266 San Diego, CA 92186-5266 Telephone: (619) 645-2105 Facsimile: (619) 645-2061 Attorneys for Complainant			
9		RE THE IEDICAL BOARD		
10	DEPARTMENT OF C	CONSUMER AFFAIRS CALIFORNIA		
11		1		
12	In the Matter of the Accusation Against:	Case No. AA 2015 40		
13	SUSIE DEL CASTILLO AVILES 3953 Alta Loma Drive	ACCUSATION	· · · ·	
14	Bonita, CA 91902		• •	•
15	Registered Veterinary Technician License No. TEC 6555			
16 17	Respondent.			
17			• · ·	
19	Complainant alleges:			
20		TIES		
21	1. Annemarie Del Mugnaio (Complaina	unt) brings this Accusation	solely in her o	fficial
22	capacity as the Executive Officer of the Veterinar	ry Medical Board, Departn	nent of Consum	ner
23	Affairs.			
. 24	2. On or about August 9, 2004, the Vete	erinary Medical Board issu	ed Registered	•
25	Veterinary Technician License Number TEC 655	5 to Susie Del Castillo Av	lles (Responder	nt).
26	The Registered Veterinary Technician License wa	as in full force and effect a	t all times relev	vant to
27	the charges brought herein and will expire on Dec	cember 31, 2015, unless ret	newed.	
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### JURISDICTION

1 3. 2 This Accusation is brought before the Veterinary Medical Board (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the 3 4 Business and Professions Code (Code) unless otherwise indicated. 5 4. Section 118(b) of the Code provides, in pertinent part, that the suspension, expiration, surrender, or cancellation of a license shall not deprive the Board of its authority to institute or 6 7 continue with a disciplinary proceeding during the period within which the license may be renewed, restored, reissued or reinstated. Pursuant to section 4902 of the Code, the Board may 8 renew a license within five years of its expiration. 9 5. Section 4875 of the Code provides, in pertinent part, that the board may revoke or 10 suspend for a certain time the license or registration of any person to practice veterinary medicine 11 12 or any branch thereof in this state after notice and hearing for any of the causes provided in this 13 article. In addition to its authority to suspend or revoke a license or registration, the board shall have the authority to assess a fine not in excess of five thousand dollars (\$5,000) against a 14 licensee or registrant for any of the causes specified in Section 4883. A fine may be assessed in 15 lieu of or in addition to a suspension or revocation. 16 STATUTORY PROVISIONS 17 18 6. Section 482 of the Code states: 19 Each board under the provisions of this code shall develop criteria to evaluate the rehabilitation of a person when: 20 (a) Considering the denial of a license by the board under Section 480; or 21 (b) Considering suspension or revocation of a license under Section 490. 22 Each board shall take into account all competent evidence of rehabilitation 23 furnished by the applicant or licensee. Section 490 of the Code provides, in pertinent part, that a board may suspend or 7. 24 revoke a license on the ground that the licensee has been convicted of a crime substantially 25 related to the qualifications, functions, or duties of the business or profession for which the 26 license was issued. 27 28

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### 8. Section 493 of the Code states:

Notwithstanding any other provision of law, in a proceeding conducted by a board within the department pursuant to law to deny an application for a license or to suspend or revoke a license or otherwise take disciplinary action against a person who holds a license, upon the ground that the applicant or the licensee has been convicted of a crime substantially related to the qualifications, functions, and duties of the licensee in question, the record of conviction of the crime shall be conclusive evidence of the fact that the conviction occurred, but only of that fact, and the board may inquire into the circumstances surrounding the commission of the crime in order to fix the degree of discipline or to determine if the conviction is substantially related to the qualifications, functions, functions, functions, and duties of the licensee in question.

As used in this section, "license" includes "certificate," "permit," "authority," and "registration."

9. Section 4883 of the Code states:

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

(a) Conviction of a crime substantially related to the qualifications, functions, or duties of veterinary medicine, surgery, or dentistry, in which case the record of the conviction shall be conclusive evidence.

(o) Violation, or the assisting or abetting violation, of any regulations adopted by the board pursuant to this chapter...

10. Section 4885 of the Code states:

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

### **REGULATORY PROVISIONS**

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11. California Code of Regulations, title 16, section 2007 states:

If the board or its designee asks an applicant or licensee to provide criminal history information, a licensee shall respond to that request within 30 days. The applicant or licensee shall make available all documents and other records requested and shall respond with accurate information.

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	II.			
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· 1	12. California Code of Regulations, title 1	16, section 2040 states:		
. 2		on, or revocation of a licens	e pursuant to	
. 3		ne qualifications, functions o	r duties of a	
.4		nfitness of a person holding	a license to	
5	I I I I I I I I I I I I I I I I I I I			
6	those involving the following:		4 <sub>1</sub> - 4 - 2 - 2	
7	(a) Violating or attempting to violate abetting the violation of, or conspiring to vio Division 2 of the code.	e, directly or indirectly, or a olate any provision or term of	ssisting in or f Chapter 11,	
. 8	(b) Conviction of a crime involving fis	scal dishonesty		
9				
10	13. California Code of Regulations, title 1	6, section 2041, subdivision (	b) states:	
11	(b) When considering the suspension			
12 <sup>.</sup>	that a person holding a license under Chapt convicted of a crime, the board, shall in eva and his or her eligibility for a license will co	aluating the rehabilitation of	such person	
13	(1) Nature and severity of the act(s) or	offense(s).		• •
. 14	(2) Total criminal record.			
15	(3) The time that has elapsed since con	nmission of the act(s) or offer	nse(s).	
16	(4) Whether the licensee has compli-			
17	restitution or any other sanctions lawfully im	posed against the licensee.	, procession,	
18 19	(5) If applicable, evidence of expuns 1203.4 of the Penal Code.	gement proceedings pursuan	t to Section	
20	(6) Evidence, if any, of rehabilitation s	ubmitted by the licensee.		
20	COST	r¢		
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22	1			
23	administrative law judge to direct a licentiate found			
24	the licensing act to pay a sum not to exceed the rea	_		
25	enforcement of the case, with failure of the licentia	te to comply subjecting the lic	ense to not being	
26	renewed or reinstated. If a case settles, recovery of	investigation and enforcement	nt costs may be	
27	included in a stipulated settlement.			
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(SUSIE DEL CASTILLO AVILES) ACCUSATION

### FIRST CAUSE FOR DISCIPLINE

(April 17, 2015 Criminal Convictions for Insurance Fraud, Tax Evasion & Grand Theft)
 15. Respondent's license is subject to discipline under sections 490 and 4883(a) of the
 Code in that she was convicted of orimes that are substantially related to the qualifications, duties,
 and functions of a Registered Veterinary Technician. The circumstances are as follows:

a. On April 17, 2015, in a criminal proceeding entitled *People of the State of California v. Susie Delcastillo Aviles, et al.*, in San Diego County Superior Court, case number SCD235499, Respondent was convicted on her plea of guilty to violating seven counts of Insurance Code section 11880(a), misrepresentation of a fact for the purpose of reducing the premium, rate and cost of workers' compensation insurance issued by the State Compensation Insurance Fund; Unemployment Insurance Code section 2117.5, failure to file a return and report in a timely manner with the intent to evade a tax; and Penal Code section 487(a), grand theft in excess of \$950, all felonies. Respondent admitted and the court found true the special allegations that she and her codefendant committed two or more related felonies, a material element which was fraud and embezzlement, which resulted in the loss by another person/entity of more than \$100,000.00 but less than \$500,000.00 within the meaning of Penal Code section 186.11(a)(3), and that Respondent's conduct resulted in the aggregate losses to all of the victims exceeding \$65,000.00 within the meaning of Penal Code sections 12022.6(a)(1) and 12022.6(b).

As a result of the convictions, on June 22, 2015, Respondent was granted b. 19 five years probation to the court. She was ordered committed to the custody of the sheriff for 240 20 days, with pre-custody credit for one day. Imposition of the commitment was stayed pending 21 successful completion of probation which required Respondent perform 50 hours of community 22 service, participate in treatment/therapy/counseling, submit to a Fourth Amendment waiver, pay 23 fees and fines, and comply with felony probation terms. Respondent was ordered to pay 24 restitution in the amount of \$309,516 as follows: \$8,640 to the victim of grand theft, \$243,428 to 25 the State Compensation Insurance Fund, \$57,448 to the Employment Development Department, 26 and a county collection fee of \$46,427.40 27

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(SUSIE DEL CASTILLO AVILES) ACCUSATION

### SECOND CAUSE FOR DISCIPLINE

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### (Violation of any Regulation Adopted by the Board)

3	16. Respondent's license is subject to discipline under section 4883(o) of the Code for
4	unprofessional conduct in that she failed to comply with California Code of Regulations, title 16,
5	section 2007 which requires a licensee to respond to the Board's request to provide criminal
б	history information within 30 days of the request. In a letter dated December 4, 2014, an
7	Enforcement Analyst from the Board mailed a letter to Respondent's address of record directing
8	Respondent to provide the Board with a detailed explanation of her arrest and a copy of all
9	arrest/court documents. In a letter dated January 30, 2015, an Enforcement Analyst from the
10	Board mailed a letter to Respondent's address of record making the same request. Respondent
11	failed to comply, and has not responded to the Board's requests to provide criminal history
12	information.
13	PRAYER
14	WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
15	and that following the hearing, the Veterinary Medical Board issue a decision:
16	1. Revoking or suspending Registered Veterinary Technician License Number TEC
17	6555, issued to Susie Del Castillo Aviles;
18	2. Assessing a fine against Susie Del Castillo Aviles not in excess of \$5,000 for any of
19	the causes specified in Business and Professions Code section 4883;
20	3. Ordering Susie Del Castillo Aviles to pay the Veterinary Medical Board the
21	reasonable costs of the investigation and enforcement of this case, pursuant to Business and
22	Professions Code section 125.3;
23	4. Taking such other and further action as deemed necessary and proper.
24	DATED: September 1, 2015 MAROMONIO Del Maria
25	ANNEMARIE DEL MUGNAIO
26	Executive Officer Veterinary Medical Board
27	Department of Consumer Affairs State of California
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(SUSIE DEL CASTILLO AVILES) ACCUSATION