

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

**IN THE MATTER OF THE PETITION FOR EARLY TERMINATION OF PROBATION
OF RYAN SCOTT CARPENTER, DVM**

Agency Case No. 4602021000379

HEARING DOCUMENTS

EX. #1 Case Center Page Numbers	DOCUMENTS
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A3	License Certification
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A98-A99	Probation Compliance Report
A100-A106	Communications Between Probation and Respondent



VIA ELECTRONIC MAIL, CERTIFIED MAIL AND REGULAR MAIL

October 27, 2025

Ryan Carpenter, DVM
PO Box 1491
Sierra Madre, CA 91025-4491
rscarpenter@gmail.com

**RE: HEARING NOTICE
OAH Case No. TBD
Petition for Early Termination or Modification of Penalty – Dr. Ryan Carpenter**

Dear Dr. Ryan Carpenter:

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

**Date: Thursday, January 22, 2026
Time: 9:00 AM Pacific Time
Location: Department of Consumer Affairs
Hearing Room
1625 N. Market Blvd
Sacramento, CA 95834**

Alternatively, in lieu of attending in-person at this hearing in the Sacramento office, you may attend and participate virtually via Webex:

Event address:
<https://dca-meetings.webex.com/dca-meetings/j.php?MTID=m42c3fdb0fb4e34f97b50576581d9f911>

**Event number: 2480 092 3837
Event password: CVMB122**

**Phone audio conference: (415) 655-0001
Access code: 2480 092 3837
Passcode: 2862122**

The hearing will be conducted before the California 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 Early Termination of Probation or Modification of Penalty.

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 www.vmb.ca.gov to view a copy of the agenda or you may contact me at (916) 905-5434 or via email at Alexander.Juarez@dca.ca.gov.

Sincerely,

Alexander A. Juarez
Probation Monitor
California Veterinary Medical Board

cc: Neva Tassan, Deputy Attorney General



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 Dr. Ryan Carpenter. 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:

VET No. 15878:

Ryan Carpenter, DVM
PO Box 1491
Sierra Madre, CA 91025-4491

First Issued: June 20, 2005
Expiration: February 28, 2027
Status: Current
Secondary Status: Probation

Discipline:

On or about June 23, 2022, the Board filed an Accusation (Case No. 4602021000379) against Respondent. On March 3, 2023, Respondent agreed to a Stipulated Settlement, placing his license on probation for four years with terms and conditions, effective June 19, 2023.

Dated at Sacramento, California, this 24th day of October 2025

SIGNATURE ON FILE

Robert Stephanopoulos, Enforcement Manager



BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY • GAVIN NEWSOM, GOVERNOR
 DEPARTMENT OF CONSUMER AFFAIRS • VETERINARY MEDICAL BOARD
 1747 North Market Blvd., Suite 230, Sacramento, CA 95834-2978
 P (916) 515-5220 | Toll-Free (866) 229-0170 | www.vmb.ca.gov



PETITION FOR REINSTATEMENT OR 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 PETITION [Reference Business and Professions Code section 4887]

☐ Reinstatement of Revoked/Surrendered License or Registration ☒ Modification of Probation ☒ Termination of Probation

NOTE: 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.

PERSONAL INFORMATION

NAME: First Middle Last
 Ryan Scott Carpenter

Other name(s) licensed under, if any:

HOME ADDRESS: Number & Street City State Zip
 33 Hidden Valley Rd Monrovia C A 91016

HOME TELEPHONE NUMBER WORK TELEPHONE NUMBER CELL NUMBER
 (805) 3204811

E-mail address: rscarpenter@gmail.com CA License or Registration Number 15878

Are you licensed by any other state(s) or country(ies) (please include license number(s), issue date(s), and status of license(s)):
 KY Licence # 164726 Current

ATTORNEY INFORMATION (If Applicable)

Will you be represented by an attorney? ☒ No ☐ Yes (If "Yes," please provide the following information)

NAME: N/A

ADDRESS: N/A

PHONE: N/A

DISCIPLINARY INFORMATION

Provide a brief explanation in your "Narrative Statement" as to the cause for the disciplinary action (e.g., negligence or incompetence, self use of drugs or alcohol, extreme departures from sanitary conditions, conviction of a crime, etc.)

Have you ever had your license revoked, suspended, voluntarily surrendered, denied, or placed on probation in any other state or country? ☒ No ☐ Yes

(If Yes, give a brief cause for administrative action or license denial in your "Narrative Statement" section, including dates and discipline ordered (e.g., 5 years probation.)

VETERINARIAN/REGISTERED TECHNICIAN BACKGROUNDTotal number of years in veterinary practice: **20****CONTINUING EDUCATION** (List continuing education completed since the date of the disciplinary action)

1. CSU VetCE: Basic and Advanced Equine Arthroscopy, August 2023, 31.5 hrs
2. Veterinary Bootcamp, September 2023, 10 hrs
3. AO Vet NA-Principles of Equine Fracture Management April 2024, 22.5 hrs
4. CSU VetCE: Basic and Advanced Equine Arthroscopy, August 2024, 31.5 hrs
5. Veterinary Medicine: Medical Records the Roadmap to Quality Care, September 2024, 10 hrs
6. AAEP Resort Symposium, January 2025, 15 hrs
7. AO Vet NA Webiar-Equine Ulna Fractures, March 2025, 1.25 hrs

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:

None

EMPLOYMENT HISTORY (list for the past 5 years only)

Provide the employer's name, address, phone number, job title and dates of employment:

Equine Medical Center, Cyprus CA 90630

REHABILITATION

Describe any rehabilitative 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.

1. Record Keeping CE, 2023-2024, 20 hrs
2. AAEP On Call: current
3. Grayson Jockey Club Research Advisory Committee: 2023-2024
4. Hong Kong Jockey Club Grant Review Committee: 2023 to current
5. ACVS Minimally Invasive Surgery-Orthopedics Committee: 2023 to current
6. Annual participant at Bethany Christian School STEM day: current
7. Race Track Chaplaincy of CA, Backstretch Community: current

CURRENT COMPLIANCE

Since the effective date of your last Veterinary Medical Board disciplinary action have you:

- | | | |
|---|------------------------------|--|
| 1. Been placed on criminal probation or parole? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 2. Been charged in any pending criminal action by any state, local or federal agency or court? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 3. Been convicted of any criminal offense? (A conviction includes a no contest plea; disregard traffic offenses with a \$100 fine or less.) | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 4. Been charged or disciplined by any other veterinary board? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 5. Surrendered your license to any other veterinary board? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 6. Had your licensee manager's premise permit disciplined? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 7. Had any civil malpractice claims filed against you of \$10,000 or more? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 8. Become addicted to the use of narcotics or controlled substances? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 9. Become addicted to or received treatment for the use of alcohol? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 10. Been hospitalized for alcohol or drug problems or for mental illness? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |

NOTE: If your answer is "Yes" to **any** of the above questions, please explain in the "Narrative Statement."

COST RECOVERY

Was cost recovery ordered? ☒ Yes ☐ No If yes, what is the remaining balance? 0

When is payment anticipated? N/A

DECLARATION

Executed on June 20 25, at Monrovia C A
(City) (State)

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that all statements and documents attached in support of this petition are true and correct.

Ryan Carpenter

Petitioner (print name)



Signature

The information in this document is being requested by the Veterinary Medical Board (Board) pursuant to Business and Professions Code section 4887. In carrying out its licensing or disciplinary responsibilities, the Board requires this information to make a determination on your petition for reinstatement or modification of penalty. You have a right to access the Board's records containing your personal information as defined in Civil Code section 1798.3. The Custodian of Records is the Executive Officer at the address shown on the first page.

June 20, 2025

Veterinary Medical Board
1747 N. Market Blvd., Suite 230
Sacramento, CA 95834-2978

Re: Petition for Reinstatement or Modification of Penalty,

Ryan Carpenter CA 15878, Case No. 4602021000379

Veterinary Board Members,

June 2025 not only marks the 20th year anniversary of my graduation from veterinary school but also the 2-year mark in my probationary period with the California Veterinary Medical Board. At this time, I can apply for early termination of my probationary period. As an equine racetrack practitioner, I practice predominantly at Santa Anita Racetrack and Del Mar Racetrack. These racetracks are under the jurisdiction of both the California Horse Racing Board and the Horseracing Integrity and Safety Authority at the Federal level. One of my requirements is that every treatment that I perform to a covered horse is to be reported to both authorities on a daily basis, and these treatments are reviewed by the veterinary division. This oversight provides a level of accountability in that, if anything was done in violation of the rules and regulations, it would be immediately addressed.

One of the causes of discipline was record keeping. When this was brought to my attention, our practice evaluated the medical record software that we were using and quickly realized that there were several areas in which the software needed to be improved. We immediately implemented a new software that is compliant with the requirements of the VMB. We transitioned to this software before my probation started so we would be in full compliance with the veterinary practice act. I have also reviewed the veterinary practice act, so I am very familiar with what is expected and have shared this information with my colleagues.

I also want to thank the veterinary medical board for webinar series that has provided me with an additional information that helps keep me up to date with the board's requirements and expectations. While I have not been able to attend these live, I appreciate the fact that they are recorded and posted on the website for us to reference at a later date. I have listened to two webinars discussing Misbranded Drugs and Inspections.

While on probation, I have followed all the terms of my stipulated agreement. In September 2024, Jackie Smith, at the direction of the CA VMB, did an onsite vehicle inspection and record review and reported to me that I was in full compliance and no changes were needed.

I have completed a total of 20 hours of record keeping CE, Veterinary Medical Records Bootcamp, completed September 2023, and Veterinary Medicine: Medical Records the Roadmap to Quality Care, completed September 2024. These classes have solidified key principles that I incorporate into my medical records daily.

Another cause of discipline was the use of dangerous and misbranded drugs like Thyro-L and DMSO. Initially this was a surprise to me because as a veterinary student we were taught how to utilize these therapeutic medications in equine practice. However, I was not aware that they were not FDA approved and therefore constitute a problem with their use. I have learned how to confirm if a presumed medication is FDA approved. I've also looked into the specific rules and regulations on using compounded medications and make sure that all record keeping justifies their use. I share this information with my fellow veterinarians so they are made aware of the potential problems if they don't modify their style of practice.

In May of 2023, I was approved to be an ACVS Founding Fellow Minimally Invasive Surgery (Large Animal Orthopedics) and currently serve as the Chair of this committee. I am also an AO Faculty member. One of the unique aspects of my practice is that I am presented with complicated orthopedic cases that not only originate from the racing population but also from nonracing horses. We have developed the reputation of being very good at achieving positive outcomes in these types of cases and do more complex orthopedic work than anyone on the west coast. Because of this caseload and reputation, I frequently get requests from other veterinarians to either come learn from what we do or request me to travel to their hospital to teach them what we have learned over the years. Unfortunately, one of the terms of my probationary agreement is that I cannot supervise students, interns or residents. Currently, I am required to deny these requests to stay compliant with my stipulated agreement. I look forward to the day when I can accept these requests and share my knowledge with the future generation.

After reviewing the information that I have presented, I believe I have taken this seriously, addressed the inadequacies in record keeping, and all causes of discipline, and have remained in full compliance with my stipulated agreement along with paid my financial obligation in full. I know this has been a tremendous learning process for myself and I am looking forward to continuing to practice veterinary medicine at the highest level and be an advocate for horse safety and welfare in our racing industry. I also look forward to meeting with you to discuss the opportunity of early termination of the probation of my veterinary license.

Respectfully,



Ryan Carpenter, DVM, MS
Diplomate, American College of Veterinary Surgeons
Founding Fellow, Minimally Invasive Surgery-Orthopedics
805-320-4811



ACVS[®]
AMERICAN COLLEGE of
VETERINARY SURGEONS

19785 Crystal Rock Dr, Suite 305
Germantown, Maryland 20874
301-916-0200
fax: 301-916-2287
email: acvs@acvs.org
www.acvs.org

May 19, 2023

Ryan S. Carpenter, DVM, MS
Diplomate, American College of Veterinary Surgeons (Large Animal)

Dear Dr. Carpenter,

On behalf of the Board of Regents of the American College of Veterinary Surgeons (ACVS), I am pleased to inform you that you have been approved as an ACVS Founding Fellow Minimally Invasive Surgery (Large Animal Orthopedics). You were selected as a Founding Fellow for your exemplary training, experience, and practice in the multidisciplinary approach to the prevention, diagnosis, treatment, and rehabilitation of patients undergoing minimally invasive therapies and your devotion to research in the field of minimally invasive surgery.

You will receive a certificate from the ACVS recognizing this accomplishment, and you will now be able to use the title, "ACVS Founding Fellow, Minimally Invasive Surgery (Large Animal Orthopedics)."

With sincere congratulations,

Susan L. Fubini, DVM
Diplomate, American College of Veterinary Surgeons
Chair, ACVS Board of Regents

cc: Deanna R. Worley, DVM
Diplomate, American College of Veterinary Surgeons (Small Animal)
Chair, Fellowship Committee

Kyla F. Ortved, DVM, PhD
Diplomate, American College of Veterinary Surgeons (Large Animal)
Chair, Minimally Invasive Surgery (Large Animal Orthopedics) Fellowship Oversight Committee

Ann T. Loew, EdM, CAE
Chief Executive Officer, ACVS

RYAN CARPENTER, DVM, MS, DACVS, MIS-ORTHO

PO Box 1491
 Sierra Madre, Ca 91025
 Cell: [REDACTED]
 rscarpenter@gmail.com

EDUCATION

5/2023	ACVS Founding Fellow, Minimally Invasive Surgery (Large Animal Orthopedics)
2/2010	Diplomate, American College of Veterinary Surgeons (Large Animal)
7/2006 to 7/2009	Master's Program, Colorado State University, Fort Collins, CO
9/2001 to 6/2005	Doctor of Veterinary Medicine, University of California, Davis, CA, GPA: 3.54/4.0, Class Rank: 54/124
9/2001 to 6/2003	Bachelor of Veterinary Science, University of California, Davis, CA
9/1999 to 6/2001	California Polytechnic State University, San Luis Obispo, CA, GPA: 3.88/4.0
8/1997 to 5/1999	Moorpark Community College, Moorpark, CA, GPA: 3.95/4.0

GRANTS

-
- Center for Equine Health (Spiret PI); Position Emission Tomography (PET) imaging of the racehorse fetlock after surgical repair of fracture; 2020
 - Colorado State University, College of Veterinary Medicine and Biomechanical Sciences, College Research Council (Goodrich PI); The effect of adenovirus mediated co-expression of combined bone morphogenetic protein-2 and 7 on osteoblastic differentiation of equine and human bone marrow-derived mesenchymal stem cells; \$37,007.05; 2007
 - Center for Equine Health (Galuppo PI); An evaluation of the effects of drill diameter on pushout mechanical properties of a tapered compression screw used to repair a simulated longitudinal fracture of the equine third metacarpal bone; \$17,100; 2004-2005
 - Students Training in Advanced Research Grant; \$5,000 summer stipend for research; 2004

PUBLICATIONS

-
- Orozco Lopez D, Garcia-Lopez, Carpenter RS, et al. Treatment of traumatic disruption of the suspensory apparatus in Thoroughbred racehorses at risk of proximal interphalangeal joint subluxation using a locking compression-distal femur plate for double arthrodesis. *Vet Surg* 2025; 54:439-452.
 - Bergstrom TC, Spiret MS, Carpenter RS, et al. Condylar fracture location is correlated to exercise history in Thoroughbred racehorses. *EVJ* 2025; (57) 76-86.
 - Bergstrom TC, Spiret M, O'Brion J, and Carpenter RS. Positron Emission Tomography Assessment of Metacarpal/Metatarsal Condylar Fractures Post Surgical Repair: Prospective Study in 14 Racehorses. *Veterinary Surgery*, 2024; 53(1): 131-142.
 - Conzemius MG, Hulse D, Carpenter RS. Second Look Arthroscopy, Canine and Feline Arthrology and Arthroscopy, 1st ed. Elsevier, 2025.
 - Livet V, Cachon T, Carpenter RS, Pozzi A, Hudson C, Schulz K. Arthroscopic Assisted Management of Articular Fractures, Canine and Feline Arthrology and Arthroscopy, 1st ed. Elsevier, 2025.
 - Spiret M, Arndt S, Pige C, Pye C, O'Brion J, Carpenter R, Blea J, Dowd, J. Comparison of skeletal scintigraphy and standing ¹⁸F-NaF positron emission tomography for imaging of the fetlock in 33 Thoroughbred racehorse. *Vet Radiol Ultrasound*. 2023 64,123-130.
 - Peng S, Magdesian K, Dowd J, Blea J, Carpenter R, Ho W, Finno C. Investigation of high gamma-glutamyltransferase syndrome in California Thoroughbred racehorses. *J Vet Intern Med* 2022; 2022; 1-10.
 - Pye J, Spiret M, O'Brion J, Carpenter R, Blea J, Dowd J. Longitudinal monitoring of fetlock lesion in Thoroughbred racehorses using standing ¹⁸F-sodium fluoride positron emission tomography. *AJVR*, 2022; 83 1-7.
 - Carpenter RS. Bisphosphonates in Equine Toxicology, Blackwell's five-minute veterinary consult clinical companion, 1st ed. Wiley, 2022, 92-96.
 - Carpenter RS. Occupational-related lameness conditions, Thoroughbred racehorse. In, GM Baxter (Ed), Adams' and Stashak's Lameness in Horses, 7th ed. Elsevier, 2020, 957-971.
 - Carpenter RS, Baxter GM. The equine pastern, *Compendium* 2011.
 - Carpenter RS, Goodrich LR, Frisbie DD, et al. Osteoblastic differentiation of human and equine bone marrow-derived mesenchymal stem cells with BMP-2 or BMP-7 homodimer genetic modification is compared to BMP-2/7 heterodimer

genetic modification in the presence and absence of dexamethasone. *Journal of Orthopaedic Research* 2010; 28:1330-1337.

- Carpenter RS, McIlwraith CM, Hill AE. Racing performance in 72 racehorses treated with prosthetic laryngoplasty for laryngeal hemiplegia, *Journal of Equine Veterinary Science* 2009; 29: 584-589.
- Carpenter RS, Goodrich LR, Baxter GM, et al. The use of locking compression plates for pancarpal arthrodesis in a Thoroughbred filly. *Veterinary Surgery* 2008; 37:508-514.
- Carpenter RS, Galuppo LD, Simpson EL, et al. Clinical evaluation of the locking compression plate for fetlock arthrodesis in six Thoroughbred racehorses. *Veterinary Surgery* 2008; 37: 263-268.
- Carpenter RS, Galuppo LD, Stover SM. Effect of diameter of the drill hole on torque of screw insertion and pushout strength for headless tapered compression screws in simulated fractures of the lateral condyle of the equine third metacarpal bone. *American Journal of Veterinary Research* 2005; 67: 895-900.

PRESENTATIONS

- What Fractures can be Saved, ARVS Summer Scientific Meeting, Oxford, UK, 2025.
- Fetlock Arthrodesis in California. Saving Lives Post Fracture can also Save the Sport, ARVS Summer Scientific Meeting, Oxford, UK, 2025.
- How Fracture Reduction has Improved Social License, ARVS Summer Scientific Meeting, Oxford, UK, 2025.
- Fracture repair, What is on the Horizon, Prevention, Diagnosis and Return to Exercise, ARVS Summer Scientific Meeting, Oxford, UK, 2025.
- Third Metacarpal Stress Fractures, Pathogenesis and Treatment, AO Principles of Equine Fracture Management, Columbus OH, 2024.
- Sagittal P1 Fracture Repair, Technique, Results and Complications, AO Principles of Equine Fracture Management, Columbus OH, 2024.
- Surgical Options for Racing Related Injuries and The Salvage Surgery. Reg Vet CE 2025: Upping The Game: Enhance Safety and Integrity Initiatives. Racing Medication and Testing Consortium, Santa Anita Park, CA, 2024.
- Panelist for "Diagnostic Work Up" Racing Medication and Testing Consortium, Santa Anita Park, CA, 2024.
- Standing Fracture Repair, BEVA/AAEP Transatlantic Equine Clinics, 2024.
- Spectrum of Carpal Arthrodesis, AO 2023
- Arthroscopic Surgery of the Carpus, Basic Equine Arthroscopy, Fort Collins Co, 2023.
- Emergency Response, Best Practices & Salvage Surgeries. Reg Vet CE 2023: Best Practices – The Racing Regulatory Veterinarian, Webinar Series, 2023.
- Panelist for "Evaluating the Soundness of the Racehorse in Training" and "Pre-race Examinations and Risk Assessment." Racing Medication and Testing Consortium, Gulfstream Park, FL, 2023.
- Rubrics of a Standing Fracture Repair: A USA perspective. American College of Veterinary Surgeons Annual Symposium, Portland, OR, 2022.
- Cases That Made Me Revise My Approach to Standing Fracture Repair. American College of Veterinary Surgeons Annual Symposium, Portland, OR, 2022.
- Third Carpal Fracture Repair, AO Arthroscopic-guided Repair of Equine Articular Fractures Course, Fort Collins Co, 2022.
- Equine Safety and Welfare - A California Perspective, Grayson 2022 Welfare and Safety of the Racehorse Summit, Lexington, KY, 2022.
- Current strategies for risk management of fetlock injuries in Thoroughbred racehorse, BEVA/AAEP Transatlantic Equine Clinics, 2022.
- Standing Fracture Repair in 60 Thoroughbred Racehorses. American College of Veterinary Surgeons Annual Symposium, Chicago, IL, 2021.
- United by the Horse: International Approaches to Optimizing Practice & Performance, The Thoroughbred Racehorse. AAEP Summer Series, 2021.
- Injury Mitigation: The West Coast Perspective. The 5th Tex Cauthen Seminar, The Gluck Equine Research Center, University of Kentucky, 2021.
- When To Take The Leap With Equine Fracture Repair. Association of Irish Racecourse Veterinary Surgeons, Virtual Annual CPD Seminar, 2021.
- Injury Mitigation: The West Coast Perspective. Association of Irish Racecourse Veterinary Surgeons, Virtual Annual CPD Seminar, 2021.
- Safety Issues and Efforts in Equine Sport, Past, Present and Future. American Association of Equine Practitioners Annual Symposium, Virtual Convention, 2020.
- Panelist for the Welfare and Safety of the Racehorse Summit 2020, The Grayson Jockey Club.
- Injury Mitigation: The West Coast Perspective. Fetlock Risk Assessment Consensus Conference, Newmarket, UK, 2020.
- Ethics Case-Base Panel: Who Do I Represent? American Association of Equine Practitioners Annual Symposium, Denver, CO, 2019.

- How to diagnose poor performance in the Thoroughbred racehorse. American Association of Equine Practitioners Annual Symposium, San Francisco, CA, 2018.
- Diagnosis and management of arytenoid chondritis in the Thoroughbred racehorse. American College of Veterinary Surgeons Annual Symposium, Phoenix, Az, 2018.
- Diagnosis and management of proximal suspensory desmitis in the racehorse: a USA perspective, The Racehorse Revisited, Newmarket Equine Hospital, UK, 2017.
- Juvenile tendonitis – is it really a problem? The Racehorse Revisited, Newmarket Equine Hospital, UK, 2017.
- Upper limb lameness in the Thoroughbred racehorse, American College of Veterinary Surgeons Annual Symposium, San Diego, CA 2014.
- How to treat dorsal metacarpal disease with regional tiludronate and extracorporeal shock wave therapies in Thoroughbred racehorses. American Association of Equine Practitioners Annual Symposium, Anaheim, CA, 2012.
- Genetic modification of equine bone marrow-derived mesenchymal stem cells with BMP-2 and -7 or osteoblastic differentiation.
 - Veterinary Orthopedic Society, Steamboat, Co, 2009.
 - American College of Veterinary Surgeons Annual Symposium, San Diego, Ca, 2008.
- How to apply a half limb cast and elevated support limb shoe in the standing patient. American Association of Equine Practitioners Annual Symposium, Orlando, FL, 2007.
- Effect of diameter of the drill hole on torque of screw insertion and pushout strength for headless tapered compression screws in simulated fractures of the lateral condyle of the equine third metacarpal bone.
 - American College of Veterinary Surgeons Annual Symposium, San Diego, Ca, 2005.
 - Veterinary Orthopedic Society, Snow Mass, Co, 2005.

VOLUNTEER

- ACVS Minimally Invasive Surgery-Orthopedics, Chair: 2024-Current
- AO Faculty 2021-Current
- Hong Kong Jockey Club Grant Review Committee 2021- Current
- Grayson-Jockey Club Research Advisory Committee 2020-2024
- AAEP On Call Member 2019-Current
- AAEP Racing Committee 2019-2021
- AAEP Professional Conduct & Ethics Committee 2017-2109, 2021-2023
- AAEP Educational Programs Committee 2015-2017

EXPERIENCE

- | | |
|-------------------|---|
| 9/2022 to Current | AO VET NA- Faculty Instructor <ul style="list-style-type: none"> • Principles of Equine Fracture Management, Columbus, OH • Arthroscopic-guided Repair of Equine Articular Fractures, Fort Collins CO. |
| 8/2022- Current | Basic and Advanced Equine Arthroscopy Course, Colorado State University, Fort Collins, Co <ul style="list-style-type: none"> • Faculty instructor |
| 9/2011 – Current | Equine Medical Center, Cypress, CA <ul style="list-style-type: none"> • Veterinarian and surgeon in a Thoroughbred racetrack practice • Primary surgical focus is arthroscopic, orthopedic, respiratory and soft tissue procedures |
| 7/2009 to 9/2011 | Equine Medical and Surgical Group, Arcadia, Ca <ul style="list-style-type: none"> • Associate veterinarian and surgeon in a Thoroughbred racetrack practice. • Primary surgical focus is arthroscopic, orthopedic, respiratory and soft tissue procedures. |
| 7/2006 to 7/2009 | Equine Lameness and Surgery Residency, Colorado State University, Fort Collins, CO |
| 6/2005 to 7/2006 | Thoroughbred Racetrack Internship, Equine Medical and Surgical Group, Arcadia, CA <ul style="list-style-type: none"> • Practiced veterinary medicine at Santa Anita Park, Hollywood Park, and Del Mar Thoroughbred Club |
| 6/2005 to 6/2006 | Equine Surgical Internship, Equine Medical Center, Cypress, CA <ul style="list-style-type: none"> • Assisted in a variety of soft tissue, arthroscopic, and orthopedic surgeries with Dr. C. Wayne McIlwraith |

- 4/2002 to 6/2005 **Student Research, J.D. Wheat Veterinary Orthopedic Research Laboratory, UC Davis, CA**
- Obtained funding, organized, and conducted an orthopedic research project with Drs. SM Stover and LD Galuppo: Effect of diameter of the drill hole on torque of screw insertion and pushout strength for headless tapered compression screws in simulated fractures of the lateral condyle of the equine third metacarpal bone
- 9/2001 to 6/2005 **Veterinary Student, Veterinary Medical Teaching Hospital, UC Davis, CA**
- Student Veterinary Assistant for the UC Davis Equestrian Center, 2004-2005
 - Student Chapter of the AAEP, various leadership activities, 2001-2005
 - Equine Emergency Receiving Team, responsible for weekend treatments on hospitalized equine patients, 2002 – 2004
 - Head Barn Nurse, responsible for overseeing all equine student positions, 2003 -2004
 - Completed a summer rotation with the Equine Medicine Service, 2002
 - Participated in Colic Team, 2001
- 2/1997 to 9/2001 **Veterinary Technician, Humphrey, Giacomuzzi and Associates Equine Hospital, Somis, CA**

1/ST

May 27, 2025

Veterinary Medical Board
1747 N. Market Blvd., Suite 230
Sacramento, CA 95834-2978

Re: Reinstatement Petition for Dr. Ryan Carpenter

Veterinary Board Members:

I am writing on behalf of Dr. Ryan Carpenter as he seeks early reinstatement for full licensure by the California Veterinary Medical Board. I am a licensed veterinarian in California as well as six other jurisdictions. I am the Chief Veterinary Officer for 1/ST Racing which owns Santa Anita Park – one of the locations where Dr. Carpenter practices.

I am aware of the accusations regarding medical records and prescribing medications that were brought in 2022 by the Veterinary Medical Board. I am aware of the circumstances surrounding this complaint.

I am in a unique position to make these statements as Federal law requires that Dr. Carpenter report every medication prescribed to a patient at Santa Anita Park to a central database. Additionally, Federal law requires certain medical records to be submitted to the Horseracing Integrity and Safety Authority. As a quasi-regulatory veterinarian, I can view the medications prescribed by Dr. Carpenter as well as a selection of medical records that he has completed since 2023.

Through this process, I can affirm that Dr. Carpenter's prescribing history since being placed on probation has been consistent with California and Federal law. There are

285 W. Huntington Drive
Arcadia, CA 91007
626-574-7223

appropriate examinations for prescribed medications to show evidence of a veterinarian-patient relationship. The medications prescribed are FDA approved for use in the horse, when such medications are available. Alternatively, Dr. Carpenter used FDA approved medications pursuant to AMDUCA when there were no species-specific alternatives.

Moreover, I find his records to be complete and accurate – the type of record that would allow another practitioner to understand the health of the patient as well as what was done, why it was done, and to continue treatment in Dr. Carpenter's absence. Having been an expert witness in several cases involving medical records, I personally find Dr. Carpenter's to be among the most thorough I have reviewed.

Beyond addressing the concerns raised in the Veterinary Medical Board's investigation, Dr. Carpenter has worked to elevate the veterinary profession. He has participated in several clinical studies involving complex surgical techniques with practitioners from around the country. He has also worked with surgeons from around the world to help find ways to improve racehorse safety – focusing on injuries common in our horses.

Furthermore, through his work Dr. Carpenter has saved many horses. I have personal knowledge of horses that Dr. Carpenter has performed surgery on that would have been euthanized less than a decade ago. Instead, these horses are going on to have second careers as riding horses. One such horse is Eel Point – a horse that helps children with various challenges at the Square Peg Foundation. Dr. Carpenter's surgery on this horse has helped not only Eel Point but the countless kids who interact with Eel Point weekly. I firmly believe that Dr. Carpenter is one of a handful of surgeons in the world who could perform some of the surgeries he performs with consistently successful outcomes.

In addition to his patients, Dr. Carpenter gives back to the future generations of veterinarians. We often have vet-student externs or interns at the track. And while Dr.

Carpenter cannot be a mentor due to his probationary status, he takes time to talk to the students and encourage them on their paths to becoming veterinarians. I personally am hopeful that his probation will be ended to allow him to be more involved in these programs as he is an excellent teacher and remains passionate about the profession.

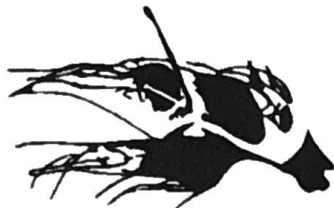
I am happy to speak further on these issues. My cellular telephone number is: [REDACTED]
[REDACTED] and my home address is: [REDACTED] Please reach out to me at any time.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Dionne Benson', followed by a long horizontal flourish.

Dionne Benson, DVM, JD
Chief Veterinary Officer
1/ST Racing



Florida Equine Imaging & Sports Medicine

John G. Peloso, DVM, MS, Diplomate, ACVS, MRCVS

April 22, 2025

Ryan S Carpenter

Dear Dr. Carpenter:

The purpose of this document is to provide you with a letter of recommendation for submission to the California Veterinary Medical Board. It is my hope that this letter assists you with your application for early termination of your probation, to be submitted on the 2-yr-anniversary of your probation.

For completeness, my name is John Gerard Peloso and I am board certified equine veterinarian and surgeon licensed to practice veterinary medicine as license number Vet23751 by the California Veterinary Medical Board. My mailing address is [REDACTED], my mobile phone number is [REDACTED], and my email address is [REDACTED].

As a practicing equine veterinarian since 1987, I have had a longstanding interest in breakdown injury and have held racetrack veterinarians in Southern California in the highest regard. As a collective, you have spent money and cooperated to create protocols and produced many scientific manuscripts to understand and enhance equine safety in the racing Thoroughbred. Your work has significantly affected my career and has profoundly reduced racing injuries for the benefit of Thoroughbred racehorses worldwide. It is curious that this collective of high-minded activists do not recognize their overreach or the true role that you and many Southern California racetrack veterinarians have played in these outcomes. I have struggled to find an explanation for your sanctions, your probation, and how a career of service has been damaged.

For completeness, I am aware that in you were cited as causes for discipline on June 23, 2022, an accusation was filed against the license of Ryan Scott Carpenter (VET 15878) for

1. Negligence - Prescribing, dispensing, or administering medications to animal patients without performing an exam and forming a diagnosis;
2. Unprofessional Conduct - Dispensing dangerous drugs without medical necessity.
3. Unprofessional Conduct - Prescribing Controlled Substances without a medical purpose.
4. Unprofessional Conduct - Failure to establish a veterinarian-client-patient relationship.
5. Violations of the Practice Act and Board Regulations - Recordkeeping.
6. Unprofessional Conduct - Misbranded drugs - selling, delivering, holding, or offering for sale drugs that are misbranded;
7. Unprofessional Conduct - minimum standards for drug logs.
8. Unprofessional Conduct - Possession or Use of Prohibited Drugs.
9. Violations of the Practice Act - Failure to provide required drug consultations.

For completeness, I cite these actions as a short list of your activities since the date the disciplinary penalty was imposed.

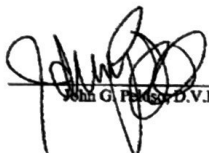
1. A member of the AAEP racing and Ethics committee.
2. A member of the American College of Veterinary Surgeons.
3. A member of the Southern California Equine Foundations.
4. Active media participant regarding breakdown injury in Thoroughbred racehorses
5. Primary surgeon for fetlock arthrodesis surgery on California Thoroughbreds with breakdown injury.
6. Authored or co - authored 4 articles in peer reviewed journals since 2023 to improve the health and welfare of the racing Thoroughbred.

Your orthopedic experience and case load is enviable and arguably unmatched by equine surgeons across the US. You have often assisted me with difficult fracture cases, and this has provided great benefit to me and the horses in my practice. Item 7 in your disciplinary action precludes you from supervising students, interns, or residents. I find this a particularly unfair punishment and am concerned that horses have suffered unnecessarily. Most students, interns, and residents do not have the training to make these difficult orthopedic decisions, and I am anxious for item 7 to be removed.

Other activities that affected me personally were a project funded by the Dolly Green research foundation and the SCEF using the Santa Anita standing MRI to identify risk factors for breakdown injury using this equipment as a surveillance tool to identify the at-risk horse. When the AAEP held its annual convention in San Diego in 2023, you helped organize a day trip from San Diego to Del Mar Racecourse for near graduates. Your objective was to improve awareness of the racing industry, its relationship with veterinary medicine, and the multitude of opportunities for a career at the racetrack as a private practitioner or a regulatory veterinarian. The goal of the event was to attract the attention of 20 - 30 students but the numbers had to be capped as 110 young scholars from veterinary schools across the United States and overseas participated in the occasion.

It is with pride that I state to the committee that I declare, under penalty of perjury under the laws of the State of California, that the foregoing is true and correct. Your years of service to the Thoroughbred racehorse is admirable and to be emulated.

Respectfully,



John G. Peloso, D.V.M.

John Peloso, DVM, MS
Diplomate, American College of Veterinary Surgeons
Florida Equine Imaging & Sports Medicine
[REDACTED]

Colorado State University
Translational Medicine Institute
This is to certify that

Ryan Carpenter

Participated in
Basic Equine Arthroscopy
August 23-24, 2023

This program has been approved for 19.5 hours of continuing education credit in jurisdictions that recognize RACE approval.



Ross H. Palmer, DVM, MS, DAVCS
Associate Director of Continuing Education

Translational Medicine Institute, Colorado State University, Fort Collins, CO 80523

Program Category: ☒ Medical ☐ Non-Medical **Delivery Method:** ☐ Online ☒ In-Person ☐ Hybrid

RACE Program Number(s): 20-846005

RACE provider number: 50-28805

Participant License State & Number:

**Colorado State University
Translational Medicine Institute**

This is to certify that

Ryan Carpenter

Participated in

Advanced Equine Arthroscopy

August 24-26, 2023

This program has been approved for 19.5 hours of continuing education credit in jurisdictions that recognize RACE approval.



**Ross H. Palmer, DVM, MS, DAVCS
Associate Director of Continuing Education**

Translational Medicine Institute, Colorado State University, Fort Collins, CO 80523

Program Category: ☒ Medical ☐ Non-Medical **Delivery Method:** ☐ Online ☒ In-Person ☐ Hybrid

RACE Program Number(s): 20-846005

RACE provider number: 50-28805

Participant License State & Number:

VETERINARY BOOTCAMP CERTIFICATE OF COMPLETION

Awarded to:

Ryan Carpenter

For satisfactorily completing the Veterinary Medical Records CE online course., which covers several topics related directly to the subject of medical record keeping as it pertains to the veterinary field for 10 hours of continuing education contact hours.

Completed on September 11, 2023



ABIGAIL KITCHENS, DVM
CEO, Veterinary Bootcamp CE, LCC.

This program 42528 is approved by the AAVSB RACE to offer a total of 10 CE credits. 10 max being available to any one veterinarian. This RACE approval is for the subject matter categories of: Category Three: non Scientific, Practice Management, Professional Development using the delivery method of interactive distance. 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



North America

Certificate of Participation

Awarded to:

Ryan Carpenter, DVM, MS, DACVS

State of Licensure CA

License Number 15878

For attending

AO VET NA Blended Course—Principles of Equine Fracture Management - LIVE Event

4/10/2024 to 4/12/2024

Columbus, Ohio, USA

Presented by:

AO North America, Inc.

435 Devon Park Drive

Building 800, Suite 820

Wayne, Pennsylvania 19087

Method of Delivery: Seminar/Lecture and Laboratory Exercises

Number of Contact Hours earned per Subject Matter Category:

Scientific/Clinical: Surgery: 22.5

AAVSB RACE Provider No. 244

Amy S. Kapatkin, DVM, MS, DACVS
President, AO North America, Inc.

This program is approved by the AAVSB RACE to offer a total of 22.5 CE Credits, with a maximum of 22.5 CE Credits being available to any individual veterinarian or veterinary technician/technologist. This RACE approval is for the subject matter categories of: Scientific/Clinical: Surgery using the delivery method of Seminar/Lecture and Laboratory Exercises. This approval is valid in jurisdictions which recognize AAVSB RACE; however, participants are responsible for ascertaining each board's CE requirements.

A022

A022

Colorado State University
Translational Medicine Institute
This is to certify that

Ryan Carpenter

Participated in
Basic Equine Arthroscopy
August 21-22, 2024

This program has been approved for 12.0 hours of continuing education credit in jurisdictions that recognize RACE approval.



Ross H. Palmer, DVM, MS, DAVCS
Associate Director of Continuing Education

Translational Medicine Institute, Colorado State University, Fort Collins, CO 80523

Program Category: ☒ Medical ☐ Non-Medical **Delivery Method:** ☐ Online ☒ In-Person ☐ Hybrid

RACE Program Number(s): 20-8545999

RACE provider number: 50-28805

Participant License State & Number:

Colorado State University
Translational Medicine Institute
This is to certify that

Ryan Carpenter

Participated in
Advanced Equine Arthroscopy
August 22-24, 2024

This program has been approved for 19.5 hours of continuing education credit in jurisdictions that recognize RACE approval.



Ross H. Palmer, DVM, MS, DAVCS
Associate Director of Continuing Education

Translational Medicine Institute, Colorado State University, Fort Collins, CO 80523

Program Category: ☒ Medical ☐ Non-Medical **Delivery Method:** ☐ Online ☒ In-Person ☐ Hybrid

RACE Program Number(s): 20-846005

RACE provider number: 50-28805

Participant License State & Number:



Ryan Carpenter, DVM

has completed

Veterinary Medicine: Medical Records the Roadmap to Quality Care

on September 20, 2024

This program 742657 is approved by the AAVSB RACE to offer a total of 10.00 CE Credits (10.00 max) being available to any one veterinarian: and/or 10.00 Veterinary Technician CE Credits (10.00 max).

This RACE approval is for the subject matter categories of: Medical using the delivery method of Interactive Distance. 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.

David Tollon, DVM, MBA, Founder

Pat Lynch, Director of Operations

VetMedTeam, LLC, 2325 SW Dodge Terrace, Port St. Lucie, FL 34953
www.VetMedTeam.com



Ryan Carpenter, DVM

has completed

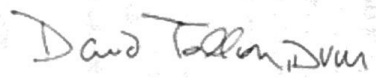
Veterinary Medicine: Medical Records the Roadmap to Quality Care

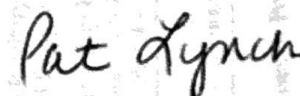
on September 20, 2024

This course is applicable for 10.0 CE credits toward the continuing education requirement for the Certified Veterinary Practice Manager program offered by the Veterinary Hospital Managers Association (VHMA).

Subject Category:
Practice Management

Method of Delivery:
Interactive Online


David Tollon, DVM, MBA, Founder


Pat Lynch, Director of Operations

VetMedTeam, LLC, 2325 SW Dodge Terrace, Port St. Lucie, FL 34953
www.VetMedTeam.com

Continuing Education Verification

AAEP Resort Symposium

Maui • January 20-22, 2025

This certifies that Ryan Carpenter attended the following scientific sessions sponsored by the AAEP in Maui, January 20-22, 2025.

This form is for your own records. **DO NOT SEND TO AAEP.** Use this record to help you meet license renewal or academy requirements. After the meeting, place this completed record in a file along with your registration receipts, program information and notes. Documentation of this type for license renewal and tax deduction purposes is similar. The individual licensed veterinarian is responsible for the accuracy of his or her own CE records. A license renewal form is a legal document that cannot be falsified without risking the loss of your license.

The American Association of Veterinary State Boards RACE committee has designated up to 15 hours in continuing education credit hours for this seminar. Check the session(s) that you attend and write the total in the statement certifying your attendance.

Monday, January 20

- | | |
|--|--|
| Comprehensive Management of Equine Lameness: Highlights from New Studies of Interest – <i>Nathan Voris</i> | <input checked="" type="checkbox"/> 1 hr |
| Practical Surgical Advances in the Performance Horse: Part I Diagnosis – <i>Travis Tull</i> | <input checked="" type="checkbox"/> 1 hr |
| Practical Surgical Advances in the Performance Horse: Part II Utilizing Advanced Imaging in Surgical Planning, Intra-Operative Guidance and Injury Resolution – <i>Travis Tull</i> | <input checked="" type="checkbox"/> 1 hr |
| Update on Joint Therapies – <i>Erin Contino</i> | <input checked="" type="checkbox"/> 1 hr |
| Advances in Performance Horse Imaging: CT and PET – <i>Katherine S. Garrett</i> | <input checked="" type="checkbox"/> 1 hr |




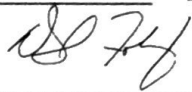
Tuesday, January 21

- | | |
|--|--|
| Neurological Causes of Poor Performance: Part I – <i>Monica Aleman</i> | <input checked="" type="checkbox"/> 1 hr |
| Neurological Causes of Poor Performance: Part II – <i>Monica Aleman</i> | <input checked="" type="checkbox"/> 1 hr |
| Percutaneous Single Portal Endoscopic Foraminotomy:
Indications, Outcomes, and Case Examples – <i>Travis Tull</i> | <input checked="" type="checkbox"/> 1 hr |
| Frontiers in Pituitary and Metabolic Dysfunction:
Updated Diagnostics and Current Treatments – <i>Peter Morresey</i> | <input checked="" type="checkbox"/> 1 hr |
| Panel: Controversy in Veterinary Medicine:
Sustainability in Veterinary Medicine, Corporate Friend/Foe
Panel – <i>Aleman, Bras, Contino, Garrett, Morresey, Tull</i> | <input checked="" type="checkbox"/> 1 hr |

Wednesday, January 22

- | | |
|--|--|
| Muscle Causes of Poor Performance – <i>Monica Aleman</i> | <input checked="" type="checkbox"/> 1 hr |
| Lower Respiratory Tract Inflammation: Current Concepts in Management and Therapy – <i>Peter Morresey</i> | <input checked="" type="checkbox"/> 1 hr |
| Sex and the Performance Horse: Managing for Success – <i>Peter Morresey</i> | <input checked="" type="checkbox"/> 1 hr |
| The Athletic Hoof: Conformation, Lamellar Strains and Pains, Practical Management – <i>Raul Bras</i> | <input checked="" type="checkbox"/> 1 hr |
| Performance Horse: Case Reviews – <i>Aleman, Morresey, Tull</i> | <input checked="" type="checkbox"/> 1 hr |

I certify that I attended the sessions checked above which qualify for a total of 15 continuing education hours. A027

Signature:  State of License: CA
Address:  License # 15878
City, State, Zip:  
David L. Foley, Executive Director
American Association of Equine Practitioners

This program, #20-1261135, is approved by the AAVSB RACE to offer a total of 15 CE Credits (15 max) being available to any one veterinarian.
This RACE approval is for the subject matter category of 15 credits for medical.

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.

AAEP • 4033 Iron Works Parkway • Lexington, KY 40511 • AAVSB RACE Provider #50-26203



North America

A029

Certificate of Participation

Awarded to:

Ryan Carpenter, DVM, MS, DACVS

State of Licensure CA

License Number 15878

For participating in the webinar:

AO VET NA Webinar—Equine Ulna Fractures

3/12/2025 to 3/12/2025

Presented by:

AO North America, Inc.
435 Devon Park Drive
Building 800, Suite 820
Wayne, Pennsylvania 19087

Method of Delivery: Seminar/Lecture and Laboratory Exercises

Number of Contact Hours earned per Subject Matter Category:

Scientific/Clinical: Surgery: 1.25

AAVSB RACE Provider No. 244

Mark A. Lee, MD
President, AO North America, Inc.

This program 1280405 is approved by the AAVSB RACE to offer a total of 1.25 CE Credits, with a maximum of 1.25 CE Credits being available to any individual veterinarian or veterinary technician/technologist. This RACE approval is for the subject matter categories of: Scientific/Clinical: Surgery using the delivery method of Seminar/Lecture and Laboratory Exercises. This approval is valid in jurisdictions which recognize AAVSB RACE; however, participants are responsible for ascertaining each board's CE requirements.

A029

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

In the Matter of the Accusation Against:

Ryan Scott Carpenter, DVM,

Veterinarian License No. VET 15878,

Respondent

Case No. 4602021000379

OAH No. 2022100202

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Veterinary Medical Board, Department of Consumer Affairs, State of California, as its Decision in this matter.

This Decision shall become effective on June 19, 2023.

It is so ORDERED May 19, 2023.

Signature on file

Christina Bradbury, DVM, President
VETERINARY MEDICAL BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

1 ROB BONTA
 Attorney General of California
 2 THOMAS L. RINALDI
 Supervising Deputy Attorney General
 3 MICHAEL YI
 Deputy Attorney General
 4 State Bar No. 217174
 ELAINE YAN
 5 Deputy Attorney General
 State Bar No. 277961
 6 300 So. Spring Street, Suite 1702
 Los Angeles, CA 90013
 7 Telephone: (213) 269-6483
 Facsimile: (916) 731-2126
 8 E-mail: Michael.Yi@doj.ca.gov
Attorneys for Complainant
 9

10 **BEFORE THE**
VETERINARY MEDICAL BOARD
 11 **DEPARTMENT OF CONSUMER AFFAIRS**
 12 **STATE OF CALIFORNIA**
 13

14 In the Matter of the Accusation Against:

15 **RYAN SCOTT CARPENTER**
PO Box 1491
 16 **Sierra Madre, CA 91025**

17 **Equine Medical Center**
10542 Walker St.
 18 **Cypress, CA 90630**

19 **Veterinarian License No. VET 15878,**

20 **Respondent.**

Case No. 4602021000379

OAH No. 2022100202

STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER

21
 22 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
 23 entitled proceedings that the following matters are true:

24 **PARTIES**

25 1. Jessica Sieferman (Complainant) is the Executive Officer of the Veterinary Medical
 26 Board (Board). She brought this action solely in her official capacity and is represented in this
 27 matter by Rob Bonta, Attorney General of the State of California, by Michael Yi and Elaine Yan,
 28 Deputy Attorneys General.

2. Respondent Ryan Scott Carpenter (Respondent) is represented in this proceeding by attorneys Lisa J. Brown and George M. Wallace, whose address is: 215 North Marengo Avenue, Third Floor, Pasadena, CA 91101-1504.

3. On June 20, 2005, the Board issued Veterinarian License Number VET 15878 to Respondent. The Veterinarian License was in full force and effect at all times relevant to the charges brought in Accusation number 4602021000379, and will expire on February 28, 2025, unless renewed.

JURISDICTION

4. Accusation number 4602021000379 was filed before the Board, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on June 24, 2022. Respondent timely filed his Notice of Defense contesting the Accusation.

5. A copy of Accusation number 4602021000379 is attached as exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

6. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation number 4602021000379. Respondent has also carefully read, fully discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order.

7. Respondent is fully aware of his legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to confront and cross-examine the witnesses against him; the right to present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

9. Respondent understands and agrees that the charges and allegations in Accusation number 4602021000379, if proven at a hearing, constitute cause for imposing discipline upon his Veterinarian License.

10. For the purpose of resolving the Accusation without the expense and uncertainty of further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual basis for the charges in the Accusation, and that Respondent hereby gives up his right to contest those charges.

11. Respondent agrees that his Veterinarian License is subject to discipline and he agrees to be bound by the Board's probationary terms as set forth in the Disciplinary Order below.

CONTINGENCY

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

13. The parties understand and agree that Portable Document Format (PDF) and facsimile copies of this Stipulated Settlement and Disciplinary Order, including PDF and facsimile signatures thereto, shall have the same force and effect as the originals.

14. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary

Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

15. 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 Disciplinary Order:

DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Veterinarian License Number VET 15878 issued to Respondent Ryan Scott Carpenter is revoked. However, the revocation is stayed and Respondent is placed on probation for four (4) years on the following terms and conditions:

1. Obey All Laws

Respondent shall obey all federal and state laws and regulations substantially related to the practice of veterinary medicine. Within thirty (30) days of any arrest, Respondent shall notify the Board. Within thirty (30) days of any conviction, Respondent shall report to the Board and provide proof of compliance with the terms and conditions of the court order including, but not limited to, probation and restitution requirements. Obey all laws shall not be tolled.

2. Quarterly Reports

Respondent shall report quarterly to the Board or its designee, under penalty of perjury, on forms provided by the Board, stating whether there has been compliance with all terms and conditions of probation. Omission or falsification in any manner of any information on these reports shall constitute a violation of probation and shall result in the filing of an accusation and/or a petition to revoke probation against Respondent's license registration or permit. If the final written quarterly report is not made as directed, the period of probation shall be extended until the final report is received by the Board. Any period(s) of delinquency in submission of reports as directed may be added to the total period of probation.

3. Interview with the Board

Within 30 days off the effective date of the Decision, Respondent shall appear in person for an interview with the Board or its designee to review the terms and conditions of probation. Thereafter, Respondent shall, upon reasonable request, report or appear in person as directed.

1 Interview with the Board shall not be tolled.

2 **4. Cooperation with Board Staff**

3 Respondent shall cooperate with the Board's inspection program and with the Board's
4 monitoring and investigation of Respondent's compliance with the terms and conditions of
5 Respondent's probation. Respondent may receive the assistance of private counsel, but
6 Respondent shall communicate directly with the Board or its designee, and written
7 communications from the Board will only be sent to the Respondent. Respondent shall make
8 available all patient records, hospital records, books, logs, and other documents relating to the
9 practice of veterinary medicine to the Board, upon request.

10 Respondent shall claim all certified mail issued by the Board, respond in a timely manner to
11 all notices and requests for information, and submit Reports, Identification Update reports or
12 other reports similar in nature, as requested and directed by the Board or its designee.
13 Respondent is encouraged to contact the Board's probation monitoring program representative at
14 any time Respondent has a question or concern regarding the terms and conditions of
15 Respondent's probation.

16 **5. Probation Monitoring Costs**

17 Probation monitoring costs are set at a rate of \$100 per month for the duration of the
18 probation. These costs shall be payable to the Board on a schedule as directed by the Board or its
19 designee.

20 **6. Changes of Employment or Address**

21 Respondent shall notify the Board, and appointed probation monitor in writing, of any and
22 all changes of employment, location, and address within fourteen (14) calendar days of such
23 change. This includes, but is not limited to, termination or resignation from employment, change
24 in employment status, and change in supervisors, administrators or directors. Respondent shall
25 also notify Respondent's probation monitor AND the Board IN WRITING of any changes of
26 residence or mailing address within fourteen (14) calendar days. P.O. Boxes are accepted for
27 mailing purposes; however, Respondent must also provide Respondent's physical residence
28 address as well.

1 **7. No Supervision of Students, Interns, or Residents**

2 Respondent shall not supervise students, interns, or residents.

3 **8. Notice to Employers**

4 During the period of probation, Respondent shall notify all present and prospective
5 employers of this Decision and the terms, conditions, and restrictions imposed on Respondent by
6 this Decision, as follows:

7 Within thirty (30) days of the effective date of this Decision and within fifteen (15) days of
8 Respondent undertaking any new employment, Respondent shall cause Respondent's supervisor
9 and/or managing licensee (licensee manager) to report to the Board in writing, acknowledging
10 that the listed individual(s) has/have read this Decision, including the terms conditions, and
11 restrictions imposed. It shall be Respondent's responsibility to ensure that Respondent's
12 supervisor and/or licensee manager submit timely acknowledgment(s) to the Board.

13 If Respondent provides veterinary services as a relief veterinarian, Respondent shall notify
14 each individual or entity with whom Respondent is employed or contracted and require the
15 supervisor and/or licensee manager to submit to the Board timely acknowledgment of receipt of
16 the notice.

17 **9. Notice to Employees**

18 Throughout the probationary period, and in a manner that is visible to all licensed,
19 registered, or permitted veterinary employees at the veterinary premises, Respondent shall post a
20 notice provided or approved by the Board, that recites the violations for which Respondent has
21 been disciplined and the terms and conditions of probation.

22 **10. Tolling of Probation**

23 Respondent shall notify the Board or its designee in writing within fifteen (15) calendar
24 days of any periods of non-practice lasting more than thirty (30) calendar days and shall notify
25 the Board or its designee within fifteen (15) calendar days of Respondent's return to practice.
26 Any period of non-practice will result in the Respondent's probation being tolled.

27 Non-practice is defined as any period of time exceeding thirty (30) calendar days in which
28 Respondent is not engaging in the practice of veterinary medicine in California.

1 It shall be considered a violation of probation if Respondent's periods of temporary or
 2 permanent residence or practice outside California total two years. However, it shall not be
 3 considered a violation of probation if Respondent is residing and practicing in another state of the
 4 United States and is on active probation with the licensing authority of that state, in which case
 5 the two-year tolling limitation period shall begin on the date probation is completed or terminated
 6 in that state.

7 The following terms and conditions, if required, shall not be tolled:

8 Obey All Laws
 9 Interview with the Board
 10 Tolling of Probation
 11 Maintain a Current and Active License
 12 Cost Recovery

13 Non-practice is also defined as any period that Respondent fails to engage in the practice of
 14 veterinary medicine in California for a minimum of 24 hours per week for the duration of
 15 probation (except reasonable time away from work for vacations, illnesses, etc.) or as determined
 16 by the Board. While tolled for not meeting the hourly requirement, Respondent shall comply
 17 with all terms and conditions of this Decision.

18 Any period of tolling will not apply to the reduction of the probationary term.

19 11. **Maintain a Current and Active License**

20 At all times while on probation, Respondent shall maintain a current and active license with
 21 the Board. Maintain a current and active license shall not be tolled.

22 12. **Violation of Probation**

23 If Respondent violates probation in any respect, the Board, after giving Respondent notice
 24 and the opportunity to be heard, may revoke probation and carry out the disciplinary order that
 25 was stayed. If an accusation or petition to revoke probation is filed against Respondent during
 26 probation, or if the Attorney General's office has been requested to prepare any disciplinary
 27 action against Respondent's license, the Board shall have continuing jurisdiction until the matter
 28 is final, and the period of probation shall be extended until the matter is final. No petition for
 modification or termination of probation shall be considered while there is an accusation or

petition to revoke probation pending against Respondent.

13. License Surrender While on Probation/Suspension

Following the effective date of this Decision, should Respondent cease to practice veterinary medicine due to retirement or health issues, or be otherwise unable to satisfy the terms and conditions of probation, Respondent may tender Respondent's license to practice veterinary medicine to the Board for surrender. The Board or its designee has the discretion to grant the request for surrender or to take any other action it deems appropriate and reasonable. Upon formal acceptance of the license surrender, Respondent will no longer be subject to the terms and conditions of probation. The surrender constitutes a record of discipline and shall become a part of the Respondent's license history with the Board.

Respondent must relinquish Respondent's license to the Board within ten (10) days of receiving notification from the Board that the surrender has been accepted.

14. Completion of Probation

All costs for probation monitoring and/or mandatory premises inspections shall be borne by Respondent. Failure to pay all costs due shall result in an extension of probation until the matter is resolved and costs paid or a petition to revoke probation is filed. Upon successful completion of probation and all payment of fees due, Respondent's license will be fully restored.

15. Cost Recovery

Pursuant to Section 125.3 of the California Business and Professions Code, within thirty (30) days of the effective date of this Decision, Respondent shall pay to the Board its enforcement costs including investigation and prosecution, in the amount of \$ 14,401.00 which may be paid over time in accordance with a Board approved payment plan, within six (6) months before the end of the probation term. Cost recovery shall not be tolled.

16. Inspections

If Respondent is the owner or managing licensee of a veterinary premises, the following probationary conditions apply:

(A) The location or mobile veterinary practice shall hold a current premises registration issued by the Board, and Respondent shall make the practice or location available for inspections

1 by a Board representative to determine whether the location or veterinary practice meets
2 minimum standards for a veterinary premises. The inspections will be conducted on an
3 announced or unannounced basis and shall be held during normal business hours. The Board
4 reserves the right to conduct these inspections on at least a quarterly basis during probation.
5 Respondent shall pay the Board for the cost of each inspection, which is \$500.

6 (B) As a condition precedent to any premises registration issued to Respondent as Owner or
7 managing licensee, the location or mobile veterinary practice for which application is made shall
8 be inspected by a Board representative to determine whether the location or mobile veterinary
9 practice meets minimum standards for a veterinary premises. Respondent shall submit to the
10 Board, along with any premises registration application, a \$500 inspection fee.

11 17. **Medical Records Review**

12 Within 30 calendar days of the effective date of this Decision, Respondent shall provide to
13 the Board or its designee the name and qualifications of one or more proposed reviewer of the
14 medical records of animal patients created and maintained by Respondent. If Respondent's terms
15 of probation include Supervised Practice, that supervisor also may serve as the medical records
16 reviewer. Each reviewer shall be a licensed veterinarian in California, have held a valid
17 California license for at least five (5) years, and have never been subject to any disciplinary action
18 by the Board.

19 The Board or its designee shall provide the approved reviewer with copies of this Decision.
20 Within fifteen (15) calendar days of the reviewer's receipt of this Decision, the reviewer shall
21 sign an affirmation that they have reviewed the terms and conditions of this Decision and fully
22 understands the role of the reviewer.

23 If Respondent fails to obtain the Board's or its designee's approval of a reviewer within
24 sixty (60) calendar days of the effective date of this Decision, Respondent shall receive a
25 notification from the Board or its designee to cease practicing veterinary medicine within three
26 (3) calendar days after being notified. Respondent shall cease practice until a reviewer is
27 approved to provide medical records review services.
28

The reviewer shall review a minimum of ten percent (10%) of Respondent's animal patient medical records or fifteen (15) records (whichever is greater), a minimum of twelve (12) times per year. The reviewer shall determine the method of random selection of medical records to review and shall access the medical records directly from where the medical records are being kept. Review of Respondent's medical records shall not be delegated to Respondent or Respondent's staff. The reviewer's random selection of medical records shall include medical records that correlate to the animal patient care issues or other issues identified in the disciplinary action that resulted in this Decision. Respondent is required to make all animal patient medical records available for immediate inspection and copying by the reviewer at all times during business hours. The reviewer shall immediately notify the Board's Probation Monitor if Respondent fails or refuses to make the medical records available for inspection and/or copying.

Any potential costs associated with conducting the medical records review shall be borne by Respondent.

The reviewer shall evaluate the medical records to assess 1) The medical necessity and appropriateness of Respondent's treatment; 2) Respondent's compliance with minimum standards of practice in the diagnosis and treatment of animal patients; 3) Respondent's maintenance of necessary and appropriate treatment; 4) Respondent's maintenance of necessary and appropriate records and chart entries; and 5) Respondent's compliance with existing statutes and regulations governing the practice of veterinary medicine.

The reviewer shall submit quarterly reports to the Board on a form designated by the Board. The reports shall be submitted by the reviewer directly to the Board's Probation Monitor within seven (7) calendar days after the end of the preceding quarter. The quarterly reporting periods and due dates are as follows:

Reporting Time Period	Due No Later Than
January 1 to March 31 (Quarter I)	April 7
April 1 to June 30 (Quarter II)	July 7
July 1 to September 30 (Quarter III)	October 7
October 1 to December 31 (Quarter IV)	January 7

1 **18. Continuing Education**

2 Within sixty (60) days of the effective date of this Decision, and on an annual basis
 3 thereafter, Respondent shall submit to the Board for its prior approval, an educational program or
 4 course related to recordkeeping which shall not be less than 8 hours per year, for each year of
 5 probation. Upon successful completion of the course, Respondent shall provide proof to the
 6 Board. This program shall be in addition to the Continuing Education required of all licensees for
 7 licensure renewal. All costs shall be borne by Respondent.

8 **19. Fine**

9 Respondent shall pay to the Board a fine in the amount of \$3,000.00 pursuant to Business
 10 and Professions Code sections 4875 and 4883. The fine may be paid in accordance with a Board
 11 approved payment plan, but must fully paid six (6) months before the end of the probation term.

12 **ACCEPTANCE**

13 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
 14 discussed it with my attorney Lisa J. Brown. I understand the stipulation and the effect it will
 15 have on my Veterinarian License. I enter into this Stipulated Settlement and Disciplinary Order
 16 voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the
 17 Veterinary Medical Board.

18
 19 DATED: 3/3/2023

Signature on file

20 RYAN SCOTT CARPENTER
 Respondent

21
 22 I have read and fully discussed with Respondent Ryan Scott Carpenter the terms and
 23 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.
 24 I approve its form and content.

25
 26 DATED: March 3, 2023

Signature on file

27 LISA J. BROWN
 Attorney for Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Veterinary Medical Board.

DATED: _____

Respectfully submitted,

ROB BONTA
Attorney General of California
THOMAS L. RINALDI
Supervising Deputy Attorney General
ELAINE YAN
Deputy Attorney General

Signature on file

MICHAEL YI
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 4602021000379

1 ROB BONTA
 Attorney General of California
 2 KIM KASRELIOVICH
 Supervising Deputy Attorney General
 3 MICHAEL YI
 Deputy Attorney General
 4 State Bar No. 217174
 ELAINE YAN
 5 Deputy Attorney General
 State Bar No. 277961
 6 300 So. Spring Street, Suite 1702
 Los Angeles, CA 90013
 7 Telephone: (213) 269-6483
 Facsimile: (916) 731-2126
 8 E-mail: Michael.Yi@doj.ca.gov
 Attorneys for Complainant

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

14 In the Matter of the Accusation Against:

Case No. 4602021000379

15 **RYAN SCOTT CARPENTER**

ACCUSATION

16 PO Box 1491
Sierra Madre, CA 91025

17 Equine Medical Center
10542 Walker St.
18 Cypress, CA 90630

19 Veterinarian License No. VET 15878,

20 Respondent.

23 **PARTIES**

24 1. Jessica Sieferman (Complainant) brings this Accusation solely in her official capacity
 25 as the Executive Officer of the Veterinary Medical Board (Board), Department of Consumer
 26 Affairs, State of California.

27 ///

28 ///

2. On June 20, 2005, the Board issued Veterinarian License Number VET 15878 to Ryan Scott Carpenter (Respondent). The Veterinarian License was in full force and effect at all times relevant to the charges brought in this Accusation and will expire on February 28, 2023, unless renewed.

JURISDICTION

3. This Accusation is brought before the Board under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

4. Section 118, subdivision (b), provides that suspension, expiration, surrender, or cancellation of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued, or reinstated.

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

STATUTORY PROVISIONS

6. Section 4021 defines “controlled substance” to mean “any substance listed in Chapter 2 (commencing with Section 11053) of Division 10 of the Health and Safety Code.”

7. Section 4022 provides:

“Dangerous drug” or “dangerous device” means any drug or device unsafe for self-use in humans or animals, and includes the following:

(a) Any drug that bears the legend: “Caution: federal law prohibits dispensing without prescription,” “Rx only,” or words of similar import.

(b) Any device that bears the statement: “Caution: federal law restricts this device to sale by or on the order of a _____,” “Rx only,” or words of similar import, the blank to be filled in with the designation of the practitioner licensed to use or order use of the device.

(c) Any other drug or device that by federal or state law can be lawfully dispensed only on prescription or furnished pursuant to Section 4006.

8. Section 4024, subdivision (b), defines “dispense” to include the furnishing of drugs or devices directly to a patient by a veterinarian acting within the scope of his or practice.

9. Section 4169 provides, in relevant part:

(a) A person or entity shall not do any of the following:

....

(3) Purchase, trade, sell, or transfer dangerous drugs that the person knew or reasonably should have known were misbranded, as defined in Section 111335 of the Health and Safety Code.

10. Section 4170 provides, in relevant part:

(a) No prescriber shall dispense drugs or dangerous devices to patients in his or her office or place of practice unless all of the following conditions are met:

....

(2) The dangerous drugs or dangerous devices are necessary in the treatment of the condition for which the prescriber is attending the patient.

11. Section 4829.5 provides, in relevant part:

(a) Each time a veterinarian initially prescribes, dispenses, or furnishes a dangerous drug, as defined in Section 4022, to an animal patient in an outpatient setting, the veterinarian shall offer to provide, in person or through electronic means, to the client responsible for the animal, or his or her agent, a consultation that includes the following information:

(1) The name and description of the dangerous drug.

(2) Route of administration, dosage form, dosage, duration of drug therapy, the duration of the effects of the drug, and the common severe adverse effects associated with the use of a short-acting or long-acting drug.

(3) Any special directions for proper use and storage.

(4) Actions to be taken in the event of a missed dose.

(5) If available, precautions and relevant warnings provided by the drug’s manufacturer, including common severe adverse effects of the drug.

....

(d) It shall be noted in the medical record of the animal patient if the consultation described in this section is provided or declined by the client or his or her agent.

12. Section 4855 states: "A veterinarian subject to the provisions of this chapter shall, as required by regulation of the board, keep a written record of all animals receiving veterinary services, and provide a summary of that record to the owner of animals receiving veterinary services, when requested. The minimum amount of information which shall be included in written records and summaries shall be established by the board. The minimum duration of time for which a licensed premise shall retain the written record or a complete copy of the written record shall be determined by the board."

13. Section 4883 states, in relevant part:

The board may deny, revoke, or suspend a license or registration or assess a fine as

....

(c) Violation or attempting to violate, directly or indirectly, any of the provisions of this chapter [the Veterinary Medicine Practice Act].

....

(g) Unprofessional conduct, that includes, but is not limited to, the following:

....

(3) A violation of any federal statute, rule, or regulation or any of the statutes, rules, or regulations of this state regulating dangerous drugs or controlled substances.

....

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

....

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

14. Health and Safety Code section 11153, subdivision (a), states:

(a) A prescription for a controlled substance shall only be issued for a legitimate medical purpose by an individual practitioner acting in the usual course of his or her professional practice. The responsibility for the proper prescribing and dispensing of

controlled substances is upon the prescribing practitioner, but a corresponding responsibility rests with the pharmacist who fills the prescription. Except as authorized by this division, the following are not legal prescriptions: (1) an order purporting to be a prescription which is issued not in the usual course of professional treatment or in legitimate and authorized research; or (2) an order for an addict or habitual user of controlled substances, which is issued not in the course of professional treatment or as part of an authorized narcotic treatment program, for the purpose of providing the user with controlled substances, sufficient to keep him or her comfortable by maintaining customary use.

15. Health and Safety Code section 111440 states: "It is unlawful for any person to manufacture, sell, deliver, hold, or offer for sale any drug or device that is misbranded."

16. Health and Safety Code section 111450 states: "It is unlawful for any person to receive in commerce any drug or device that is misbranded or to deliver or proffer for delivery any drug or device."

REGULATORY PROVISIONS

17. California Code of Regulations (CCR), title 4, section 1867, subsection (b), prohibits the possession and/or use on the premises of a facility under the jurisdiction of the California Horse Racing Board (CHRB) of any drug, substance, or medication by a veterinarian that has not been approved by the United States Food and Drug Administration for use in the United States.

18. CCR, title 16, section 2032.1, provides, in relevant part:

(a) It is unprofessional conduct for a veterinarian to administer, prescribe, dispense or furnish a drug, medicine, appliance, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture or bodily injury or disease of an animal without having first established a veterinarian-client-patient relationship with the animal patient or patients and the client, except where the patient is a wild animal or the owner is unknown.

(b) A veterinarian-client-patient relationship shall be established by the following:

(1) The client has authorized the veterinarian to assume responsibility for making medical judgments regarding the health of the animal, including the need for medical treatment,

(2) The veterinarian has sufficient knowledge of the animal(s) to initiate at least a general or preliminary diagnosis of the medical condition of the animal(s). This means that the veterinarian is personally acquainted with the care of the animal(s) by virtue of an examination of the animal or by medically appropriate and timely visits to the premises where the animals are kept, and

(3) The veterinarian has assumed responsibility for making medical judgments regarding the health of the animal and has communicated with the client a course of treatment appropriate to the circumstance.

1 (c) A drug shall not be prescribed for a duration inconsistent with the medical
2 condition of the animal(s) or type of drug prescribed. The veterinarian shall not
3 prescribe a drug for a duration longer than one year from the date the veterinarian
4 examined the animal(s) and prescribed the drug.

5 (d) As used herein, "drug" shall mean any controlled substance, as defined by Section
6 4021 of the code, and any dangerous drug, as defined by Section 4022 of the code.

7 (e) No person may practice veterinary medicine in this state except within the context
8 of a veterinarian-client-patient relationship or as otherwise permitted by law. A
9 veterinarian-client-patient relationship cannot be established solely by telephonic or
10 electronic means . . .

11 19. CCR, title 16, section 2032.3, provides, in relevant part:

12 (a) Every veterinarian performing any act requiring a license pursuant to the
13 provisions of Chapter 11, Division 2, of the code, upon any animal or group of
14 animals shall prepare a legible, written or computer generated record concerning the
15 animal or animals which shall contain the following information:

16 (1) Name or initials of the veterinarian responsible for entries.

17 (2) Name, address and phone number of the client.

18 (3) Name or identity of the animal, herd or flock.

19 (4) Except for herds or flocks, age, sex, breed, species, and color of the animal.

20 (5) Dates (beginning and ending) of custody of the animal, if applicable.

21 (6) A history or pertinent information as it pertains to each animal, herd, or flock's
22 medical status.

23 (7) Data, including that obtained by instrumentation, from the physical examination.

24 (8) Treatment and intended treatment plan, including medications, dosages, route of
25 administration, and frequency of use.

26 (9) Records for surgical procedures shall include a description of the procedure, the
27 name of the surgeon, the type of sedative/anesthetic agents used, their route of
28 administration, and their strength if available in more than one strength.

(10) Diagnosis or assessment prior to performing a treatment or procedure.

(11) If relevant, a prognosis of the animal's condition.

(12) All medications and treatments prescribed and dispensed, including strength,
dosage, route of administration, quantity, and frequency of use.

(13) Daily progress, if relevant, and disposition of the case . . .

////

////

20. Code of Federal Regulations, title 21, section 1304.22, provides, in relevant part:

Each person registered or authorized (by §§ 1301.13(e), 1307.11, 1307.13, or part 1317 of this chapter) to manufacture, distribute, dispense, import, export, reverse distribute, destroy, conduct research with controlled substances, or collect controlled substances from ultimate users, shall maintain records with the information listed in paragraphs (a) through (f) of this section.

....

(c) Records for dispensers and researchers. Each person registered or authorized to dispense or conduct research with controlled substances shall maintain records with the same information required of manufacturers pursuant to paragraph (a)(2)(i), (ii), (iv), (vii), and (ix) of this section. In addition, records shall be maintained of the number of units or volume of such finished form dispensed, including the name and

address of the person to whom it was dispensed, the date of dispensing, the number of units or volume dispensed, and the written or typewritten name or initials of the individual who dispensed or administered the substance on behalf of the dispenser. In addition to the requirements of this paragraph, practitioners dispensing gamma-hydroxybutyric acid under a prescription must also comply with § 1304.26.

....

COST RECOVERY

21. Section 125.3 provides, in relevant part, that a board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

DRUG AND TREATMENT CLASSIFICATIONS

22. *Acepromazine*, commonly known as Ace, is a tranquilizer used in horses. Acepromazine is restricted for use by or on the order of a licensed veterinarian and is a dangerous drug pursuant to section 4022.

23. *Adequan*, see polysulfated glycosaminoglycan.

24. *Albuterol*, a bronchodilator used to help treat bronchospasm in horses usually administered by oral or nebulization routes. It is a dangerous drug pursuant to section 4022.

25. *Altenogest*, sold under the trade name of Regumate and others is a progestenic drug used to suppress estrus in the mare. It is a dangerous drug pursuant to section 4022.

26. *Azium*, brand name for dexamethasone. It is a dangerous drug pursuant to section 4022.

- 1 27. *Banamine*, see flunixin meglumine.
- 2 28. *Baytril*, see enrofloxacin.
- 3 29. *Block*, generic term used to describe a regional nerve block using a local
4 anesthetic administered to the area or nerve serving the area to block painful sensation.
- 5 30. *Bute*, see phenylbutazone.
- 6 31. *Bute/Cort*, is a topical cream used as a sweat. It is a compounded product that
7 contains phenylbutazone, DMSO, hydrocortisone, diclofenac or variations thereof in different
8 concentrations depending on the compounding source. Bute/Cort is not approved by the FDA as
9 it is a compounded product. It is a dangerous drug pursuant to section 4022.
- 10 32. *Butorphanol tartrate*, an injectable narcotic pain medication, is sold under the trade
11 names Torbugesic and Dolorex. Butorphanol tartrate is restricted for use by, or on the order of a
12 licensed veterinarian, and is a Schedule IV controlled substance pursuant to Health and Safety
13 Code section 11057, subdivision (c)(3). It is a dangerous drug pursuant to section 4022.
- 14 *Detomidine hydrochloride* (see below) and *butorphanol tartrate* may be used in combination to
15 sedate equine patients and is commonly abbreviated as Dorm/Torb.
- 16 33. *Carbocaine*, a local anesthetic. It is a dangerous drug pursuant to section 4022.
- 17 34. *CO*, an abbreviation for Cobalt, used to enhance the oxygen carrying capacity of the
18 red blood cells. Given by injection it is a dangerous drug pursuant to section 4022.
- 19 35. *Dantrolene* is a muscle relaxant used to treat exertional rhabdomyolysis (tying up) in
20 horses. It is not commercially available as a suspension. It is available as an oral capsule and as
21 an injectable, and must be prepared by a compounding pharmacist. The compounded preparation
22 is not FDA approved. It is a dangerous drug pursuant to section 4022.
- 23 36. *Detomidine hydrochloride*, sold under the tradename Dormosedan, is a sedative used
24 in horses. Detomidine hydrochloride is restricted for use by or on the order of a licensed
25 veterinarian and is a dangerous drug pursuant to Code section 4022. Detomidine hydrochloride
26 and butorphanol tartrate may be used in combination to sedate equine patients and is commonly
27 abbreviated as Dorm/Torb.
- 28

37. *Dex – SP or dexamethasone* NaP abbreviation for dexamethasone sodium phosphate, a steroid used to treat swelling and inflammation. It is a dangerous drug pursuant to section 4022.

38. *Diazepam*, a sedative sold under the trade name of Valium, is restricted for use by or on the order of a licensed veterinarian and is a dangerous drug pursuant to section 4022 and a Schedule IV controlled substance pursuant to Health and Safety Code section 11057, subdivision (c)(3).

39. *DMSO*, abbreviation for dimethyl sulfoxide. Approved by the FDA for only topical use in the horse. No commercial DMSO approved products exist for topical or IV use and no approved commercial DMSO products exist for parental use in the horse. An industrial solvent used for anti-inflammatory properties. DMSO is a dangerous drug pursuant to section 4022.

40. *Dolorex*, trade name see butorphanol.

41. *Domorsedan*, trade name for detomidine.

42. *Dorm/Torb*, see detomidine hydrochloride and butorphanol tartrate.

43. *Enrofloxin*, sold as Enroflox and Baytril, is used to treat various infections. Enrofloxin is a dangerous drug pursuant to section 4022.

44. *E-SE* is a combination product containing vitamin E and selenium given by injection for the treatment of myositis related clinical signs. E-SE is a dangerous drug pursuant to section 4022. See also selenium-tocopherol.

45. *Electrolytes* are electrically charged minerals found in the body that are essential compounds of life. Electrolyte therapy, if given intravenously in fluid form, is a dangerous drug pursuant to section 4022.

46. *Electrolyte paste*, commonly referred to as ELPAS, is a nutritional supplement marketed as replacing crucial electrolytes depleted through exercise, stress, heat and/or humidity to help a horse maintain the necessary fluid levels for normal function.

47. *EPM Drench*, a compounded drug containing various drugs specific to the compounding formula used in the treatment of Equine Protozoal Myeloencephalitis, a

1 neurological disease of horses caused by the protozoan, *Sarcocystis neurona*. EPM Drench is a
2 dangerous drug pursuant to section 4022.

3 48. *Fluid Therapy* is a term used to describe the administration of physiologic liquids to
4 an animal. The fluids may contain electrolytes and other substances mixed into the fluids, such as
5 vitamins. A drug administered by fluid therapy is a dangerous drug pursuant to section 4022.

6 49. *Flunixin meglumine*, sold under the brand name Banamine, is an injectable non-
7 steroidal anti-inflammatory drug (NSAID) approved for use in cattle and horses in the United
8 States. Flunixin meglumine is a dangerous drug pursuant to section 4022.

9 50. *Furosemide*, sold under the brand names of Lasix or Salix, is a diuretic used in
10 horse racing as an anti-bleeding medication to prevent exercise-induced pulmonary hemorrhage
11 in horses running at high speed and has long been considered a performance enhancing drug in
12 the horse racing industry. Furosemide is available by prescription only and is a dangerous drug
13 pursuant to section 4022.

14 51. *GastroGard*, a trade name for omeprazole, is used in the treatment and prevention of
15 gastric ulcers in horses. It is a dangerous drug pursuant to section 4022.

16 52. *Hyaluronate sodium*, sold under the brand name Legend and HyVisc, is an
17 intravenous injectable solution or intra-articular used in horses to treat joint dysfunction
18 associated with equine osteoarthritis. Federal law restricts the use of hyaluronate sodium to use
19 by or on the order of a licensed veterinarian and is a dangerous drug pursuant to section
20 4022.

21 53. *Ketamine* is a Schedule III controlled substance pursuant to Health and Safety Code
22 section 11056, subdivision (g), and is a dangerous drug pursuant to section 4022.

23 54. *Ketoprofen*, sold under the brand name Ketofen, is an injectable NSAID used for
24 the alleviation of inflammation and pain associated with musculoskeletal disorders in horses.
25 Ketoprofen is a dangerous drug pursuant to section 4022.

26 55. *Lasix*, see furosemide.

27 56. *Legend*, see hyaluronate sodium.

1 57. *Methocarbamol*, sold under the brand name Robaxin-V, is a potent skeletal muscle
2 relaxant, and federal law restricts this drug to use by or on the order of a licensed veterinarian.
3 Methocarbamol is a dangerous drug pursuant to section 4022.

4 58. *Midazolam*, sold under the tradename Versed, is a benzodiazepine sedative used in
5 horses. Midazolam is restricted for use by or on the order of a licensed veterinarian and is a
6 Schedule IV controlled substance pursuant to Health and Safety Code section 11057, subdivision
7 (c)(3). It is a dangerous drug pursuant to section 4022.

8 59. *Naquasone*, see trichlormethiazide/dexamethasone.

9 60. *Omeprazole paste*, sold under the brand name Gastrogard, is used to treat equine
10 gastric ulcers. Omeprazole paste is a dangerous drug pursuant to section 4022.

11 61. *Panolog* is a trade name for a combination topical/otic preparation containing
12 nystatin, neomycin sulfate, thiostrepton, triamcinolone acetonide in an ointment form. It is a
13 dangerous drug pursuant to section 4022.

14 62. *Phenylbutazone*, commonly known as Bute and sold as Butazolidin, is a non-steroidal
15 anti-inflammatory drug (NSAID) used to treat lameness in horses. It is commonly administered
16 by IV and oral routes. Phenylbutazone is a dangerous drug pursuant to section 4022. When
17 phenylbutazone is combined with an undefined corticosteroid, the combination is commonly
18 referred to as Bute-Cort and used as a topical sweat. Bute-Cort is a dangerous drug pursuant to
19 section 4022.

20 63. *Polysulfated glycosaminoglycan*, sold under the brand name Adequan, is used for the
21 intramuscular treatment of non-infectious degenerative and/or traumatic joint dysfunction and
22 associated lameness of the carpal and hock joints in horses. Polysulfated glycosaminoglycan is a
23 dangerous drug pursuant to section 4022.

24 64. *Prednisolone*, a corticosteroid used in the treatment of inflammatory and allergic
25 conditions. It is a dangerous drug pursuant to section 4022.

26 65. *Regumate*, tradename for altrenogest, a hormone used to suppress estrus in mares.
27 It is a dangerous drug pursuant to section 4022.

28 66. *Robaxin*, see methocarbamol.

67. *Ranitidine* is used to decrease stomach acid and treat gastric ulcers. No longer available in the United States due to FDA notice of contamination with NDMA, a known carcinogen. Ranitidine is available only as a compounded product. Ranitidine is a dangerous drug pursuant to section 4022.

68. *Romifidine hydrochloride*, sold under the brand name Sedivet, is an injectable horse sedative. Romifidine hydrochloride is a dangerous drug pursuant to section 4022.

69. *Rompun*, see xylazine.

70. *Selenium-tocopherol*, sold under the brand name E-SE, is an injectable drug and labeled for only veterinary use to control myositis syndrome, rapid respiration, profuse sweating, muscle spasms and stiffness. Selenium-tocopherol is a dangerous drug pursuant to section 4022.

71. *Surpass*, the tradename for 1% diclofenac acid, is a topical anti-inflammatory cream. Surpass is a dangerous drug pursuant to section 4022.

72. *Tetracycline* is an antibiotic and is a dangerous drug pursuant to section 4022.

73. *Thyro-L*, thyroxine, also known as levothyroxine, is sold under the trade name of Thyro-L (levothyroxine sodium powder USP). Thyro-L is not approved by the FDA. The label of Thyro-L shows indications for treatment of specific disease, supplies doses, contraindications, and bears the federal legend, "Federal law restricts this product to use by or on the order of a licensed veterinarian". In as much it is a misbranded drug under federal [21 USC § 331 and 21 USC § 352(w)] and California State law [BPC § 4169]. Other commercially available forms of levothyroxine powder for equine use are marketed as branded or generic products. None of the marketed levothyroxine powder products are FDA approved. Thyro-L, levothyroxine, and branded levothyroxines are dangerous drugs as defined under section 4022.

74. *Torb* is an abbreviation for Torbugesic; see butorphanol tartrate.

75. *Triamcinolone or TA*, a corticosteroid used in the treatment of inflammatory conditions. It is a dangerous drug pursuant to section 4022.

76. *Trichlormethiazide/dexamethasone*, commonly known as Tri Dex and Naquasone, is a diuretic and corticosteroid combination used to mild swellings of the distal limbs in horses. It is not commercially available and is a compounded product only, therefore not FDA approved.

1 Trichlormethiazide/dexamethasone is a dangerous drug pursuant to section 4022.

2 77. *Trimethoprim and sulfadiazine*, sold as Uniprim, Tucoprim, and Tribriksen, is an oral
3 antibiotic used in horses to treat systemic bacterial infections. Trimethoprim and
4 sulfadiazine is restricted for use by, or on the order of a licensed veterinarian, and are dangerous
5 drugs pursuant to section 4022.

6 78. *Ulcer powder*, a compounded or otherwise manufactured product containing
7 unknown ingredients to treat and prevent gastric ulcers. It is not FDA approved and may or may
8 not be is a dangerous drug pursuant to section 4022 dependent on the active pharmaceutical
9 products contained and labeling.

10 79. *Uniprim*, see trimethoprim and sulfadiazine.

11 80. *Vitamins*, commonly referred to as Vit Booster or Vits, are injectable nutritive
12 supplements used in horses and are dangerous drugs pursuant to section 4022.

13 81. *Yunnan Paiyo*, is a herbal homeopathic drug used to prevent EIPH. In an injectable
14 form it would be a dangerous drug pursuant to section 4022. In oral form, it would be not
15 considered a dangerous drug. In either form, it is not approved by the FDA.

16 **FACTUAL ALLEGATIONS**

17 82. Respondent is employed as a veterinarian at Equine Medical Center (EMC), located
18 in Cypress, California. Respondent operates a mobile veterinary unit from EMC's fixed
19 premises.

20 83. On March 21, 2020, Board Inspector R. C. ("the Inspector") performed an inspection
21 of Respondent's mobile unit at the Santa Anita Race Track. The Inspector noted several
22 violations relating to drug logs, among other violations. Respondent received a copy of the
23 violations with instruction to submit compliance documents. Respondent provided
24 compliance/correction documents to the Board on April 20 and 21, 2020.

25 84. On or about April 30, 2020, Board Subject Matter Expert, J. H., assessed
26 Respondent's inspection and compliance documents. J. H. determined that certain violations
27 noted during the inspection remained non-compliant, including the proper disposal of controlled
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1 drugs, drug logs, and a lack of Drug Enforcement Agency (DEA) registration to transport
2 controlled substances.

3 85. On or about May 3, 2020, J. H. assessed non-compliant medical records submitted by
4 another EMC veterinarian, J. Wade Byrd, on April 22, 2020, relating to equine patients treated by
5 Respondent.

6 86. On May 15, 2020, J. H. performed an inspection of EMC's fixed premises and
7 obtained medical records for 12 equine patients treated by Respondent. The records showed that
8 Respondent failed to document the patients' medical history, examinations, diagnoses, the
9 administration of medications dosages, treatment plans, prognoses, drug consultations for
10 dispensed drugs and other required information.

11 87. In February 2021, the Board received a complaint concerning the unsafe treatment of
12 equine patients by multiple veterinarians. The Board initiated an investigation based on the
13 complaint. As part of its investigation, the Board received equine medical records from
14 Respondent and/or his representative.

15 88. During its investigation, the Board received Veterinarian Confidential Reports from
16 the CHRB documenting the equine patients treated by Respondent from January 2021 to March
17 2021. Veterinarians are required to submit Veterinarian Confidential Reports to the CHRB for
18 horses treated at any CHRB-regulated location. The reports revealed that Respondent treated
19 approximately 3,633 equine patients over 68 work days (average of 53 horses per day), as
20 follows:

- 21 a. Approximately 1,336 patients over 25 work days in January 2021;
- 22 b. Approximately 1,151 patients over 20 work days in February 2021;
- 23 c. Approximately 1,146 patients over 23 work days in March 2021;

24 89. The Veterinarian Confidential Reports for Respondent revealed that clusters of equine
25 patients were administered identical medications and treatments, at the same time, at the request
26 of their trainers without medical necessity. The following chart provides examples of the
27 medications or treatments that Respondent administered to clusters of equine patients with the
28 same trainer:

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Date	Trainer Last Initial	Number of Patients	Medication or Treatment Received
01/01/2021	Trainer B.	3 horses	Sedivet
01/01/2021	Trainer O.	6 horses	Vits, BC2A
01/01/2021	Trainer D.	4 horses	Vits
01/01/2021	Trainer D.	3 horses	Bute, DMSO Jug, Robaxin
01/02/2021	Trainer S.	6 horses	Robaxin
01/02/2021	Trainer S.	12 horses	Ulcer Powder
01/02/2021	Trainer S.	11 horses	Acepromazine Tablets
01/02/2021	Trainer S.	11 horses	Lasix Tablets
01/02/2021	Trainer S.	7 horses	Bute Powder
01/03/2021	Trainer B.	4 horses	Vits
01/05/2021	Trainer B.	2 horses	Acepromazine Tablets
01/05/2021	Trainer S.	2 horses	Acepromazine Tablets
01/05/2021	Trainer C.	4 horses	Dantrolene Liquid
01/06/2021	Trainer O.	4 horses	Bute, Robaxin, DMSO Jug, Adequan
01/07/2021	Trainer O.	4 horses	Bute, Robaxin, DMSO Jug, Adequan
01/07/2021	Trainer O.	6 horses	Vits, BC2A
01/07/2021	Trainer D.	4 horses	Bute, Robaxin, DMSO Jug, Adequan
01/08/2021	Trainer E.	5 horses	Bute, Robaxin, DMSO Jug, Adequan
01/09/2021	Trainer O.	6 horses	Vits, BC2A
01/09/2021	Trainer D.	8 horses	EPM Drench
01/13/2021	Trainer O.	5 horses	Bute, Robaxin, DMSO Jug, Adequan
01/13/2021	Trainer O.	4 horses	Bute powder
01/14/2021	Trainer D.	4 horses	Bute, Robaxin, DMSO Jug, Adequan
01/14/2021	Trainer O.	3 horses	Bute, Robaxin, DMSO Jug, Adequan
01/14/2021	Trainer O.	4 horses	Vits
01/15/2021	Trainer D.	4 horses	Vits
01/15/2021	Trainer D.	4 horses	Bute, Robaxin, DMSO Jug, Adequan
01/15/2021	Trainer O.	5 horses	Vits
01/15/2021	Trainer D.	15 horses	Adequan, COj (Cobalt Jug)
01/15/2021	Trainer O.	49 horses	Yunnan Paiyo Bleeder Formula X10
01/19/2021	Trainer D.	11 horses	Gastrogard, BC2A, Ent Powder, Bute Powder, Dantrolene Liquid
01/19/2021	Trainer D.	34 horses	Gastrogard, BC2A, Ent Powder, Bute Powder, Dantrolene Liquid, Bute/Cort, Acepromazine Pills
01/19/2021	Trainer D.	24 horses	Regumate
01/20/2021	Trainer O.	4 horses	Bute, Robaxin, DMSO Jug, Adequan
01/20/2021	Trainer B.	3 horses	Bute, Robaxin, Adequan
01/21/2021	Trainer O.	5 horses	Bute, Robaxin, DMSO Jug, Adequan
01/21/2021	Trainer O.	4 horses	Vits
01/22/2021	Trainer O.	3 horses	Bute, Robaxin, DMSO Jug, Adequan
01/22/2021	Trainer O.	6 horses	Vits
01/22/2021	Trainer D.	7 horses	Adequan
01/24/2021	Trainer B.	6 horses	Acepromazine Tablets

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01/26/2021	Trainer B.	16 horses	Sedivet
01/26/2021	Trainer S.	10 horses	Acepromazine Tablets
01/28/2021	Trainer O.	3 horses	Bute, Robaxin, DMSO Jug, Adequan
01/29/2021	Trainer O.	4 horses	Bute, Robaxin, DMSO Jug, Adequan
01/30/2021	Trainer O.	6 horses	Vits
02/02/2021	Trainer S.	6 horses	Acepromazine
02/03/2021	Trainer D.	3 horses	Bute, Robaxin,
02/04/2021	Trainer O.	3 horses	Bute, Robaxin,
02/04/2021	Trainer D.	5 horses	Bute, Robaxin,
02/05/2021	Trainer D.	4 horses	Bute, Robaxin,
02/05/2021	Trainer D.	5 horses	Vits
02/06/2021	Trainer O.	7 horses	Vits
02/11/2021	Trainer O.	3 horses	Bute, Robaxin, DMSO Jug, Adequan
02/12/2021	Trainer O.	3 horses	Bute, Robaxin, DMSO Jug, Adequan
02/12/2021	Trainer O.	5 horses	Vits
02/12/2021	Trainer O.	9 horses	Adequan
02/12/2021	Trainer O.	45 horses	Yunnan Paiyo X10
02/17/2021	Trainer O.	3 horses	Bute, Robaxin, DMSO Jug, Adequan
02/18/2021	Trainer O.	3 horses	Bute, Robaxin, DMSO Jug, Adequan
02/18/2021	Trainer O.	6 horses	Vits
02/18/2021	Trainer O.	26 horses	Regumate
02/18/2021	Trainer O.	46 horses	Gastrogard, BC2A
02/18/2021	Trainer D.	34 horses	BC2A, Ent Pwd, Bute Pwd, Dantrolene Liquid, Gastrogard
02/18/2021	Trainer D.	22 horses	Ent Pwd, Bute Pwd, Dantrolene Liquid, Gastrogard
02/19/2021	Trainer O.	11 horses	Adequan
02/19/2021	Trainer O.	4 horses	Vits
02/24/2021	Trainer O.	3 horses	Bute, Robaxin, DMSO Jug, Adequan
02/25/2021	Trainer D.	4 horses	Bute, Robaxin, DMSO Jug, Adequan
02/26/2021	Trainer O.	10 horses	Adequan
02/27/2021	Trainer S.	4 horses	Robaxin
02/27/2021	Trainer S.	11 horses	Ulcer Powder
02/27/2021	Trainer S.	12 horses	Acepromazine Tabs
02/27/2021	Trainer S.	7 horses	Uniprim
03/04/2021	Trainer D.	4 horses	Bute, Robaxin, DMSO Jug, Adequan
03/04/2021	Trainer D.	8 horses	Adequan
03/05/2021	Trainer D.	3 horses	Bute, Robaxin, DMSO Jug
03/05/2021	Trainer D.	4 horses	Vits
03/05/2021	Trainer O.	6 horses	Adequan
03/06/2021	Trainer D.	6 horses	Adequan
03/09/2021	Trainer Y.	4 horses	Bute Powder
03/11/2021	Trainer O.	3 horses	Bute, Robaxin, DMSO Jug, Adequan
03/11/2021	Trainer D.	4 horses	Bute, Robaxin, DMSO Jug, Adequan
03/12/2021	Trainer D.	4 horses	Bute, Robaxin, DMSO Jug, Adequan

03/12/2021	Trainer M.	45 horses	Gastrogard, Yunnan Paiyo Herb Supplement
03/13/2021	Trainer D.	17 horses	Adequan
03/16/2021	Trainer S.	6 horses	Acepromazine
03/16/2021	Trainer S.	11 horses	Acepromazine Tabs
03/16/2021	Trainer S.	11 horses	Regumate
03/16/2021	Trainer S.	8 horses	Bute Powder
03/16/2021	Trainer S.	8 horses	Yunnan Paiyo
03/16/2021	Trainer D.	4 horses	Bute, Robaxin, DMSO Jug
03/16/2021	Trainer D.	4 horses	Bute, Robaxin, DMSO Jug, Adequan
03/16/2021	Trainer M.	3 horses	Bute, Robaxin, DMSO Jug, Adequan
03/16/2021	Trainer D.	3 horses	Bute, Robaxin, DMSO Jug, Adequan
03/16/2021	Trainer D.	23 horses	Regumate
03/16/2021	Trainer D.	43 horses	BC2A, ENT, Bute Powder, BC Jar, Acepromazine Tabs, Dantrolene Liquid
03/16/2021	Trainer D.	15 horses	BC2A, ENT, BC Jar, Bute Powder, Dantrolene Liquid
03/16/2021	Trainer D.	3 horses	Bute, Robaxin, DMSO Jug, Adequan
03/16/2021	Trainer D.	3 horses	Bute, Robaxin, DMSO Jug, Adequan
03/16/2021	Trainer Y.	6 horses	Acepromazine Tabs
03/16/2021	Trainer D.	7 horses	Adequan

FIRST CAUSE FOR DISCIPLINE

(Negligence)

90. Respondent is subject to disciplinary action under section 4883, subdivision (i), for negligence in the practice of veterinary medicine. Respondent prescribed, dispensed, or administered a drug, medication, appliance, application, or treatment to animal patients without performing an appropriate examination and forming a diagnosis of any condition that required treatment, as follows:

91. Between January 4, 2019 and September 14, 2019, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or administered Lasix, Ace injection, Naquasone paste, Adequan, Surpass cream, Banamine paste, Panolog ointment, Carbocaine and Vetalog injection, and nerve block to equine patient F. S.¹

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¹ Initials are used to protect the equine patients' identities.

92. Between January 10, 2019 and August 30, 2019, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or administered Vit. Booster, Methocarbamol, Omeprazole paste, Acepromazine, Tucoprim, Albuterol syrup, Ranitidine, Azium powder, Lasix, Ketofen, Bute injection, Bute powder, Prednisolone, Electrolytes + Vits, Thyro-L powder, Electrolyte paste, and Uniprim to equine patient W. D.

93. Between January 22, 2019 and October 2, 2019, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or administered Dorm/Torb, an x-ray of the right front medial splint, Lasix, Thyro-L powder, Pen-G, Gentocin, Rompun/Ace, pack castration site, and Ketamine/Medazolam, to equine patient P. L.

94. Between January 23, 2019 and June 5, 2019, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or administered GastroGard, Ranitidine, Lasix, Thyro-L powder, Bute, Adequan, and DMSO to equine patient A. L.

95. Between January 29, 2019 and August 19, 2019, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or administered Ranitidine, Lasix, Thyro-L powder, Bute injection, Adequan, Methocarbamol injection, Vit. Booster, Dorm/Torb and DMSO to equine patient V. St.

96. Between March 28, 2019 and August 9, 2019, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or administered Lasix, Glycopyrulate, Bute injection, Dorm/Torb, and Thyro-L powder to equine patient I. T.

97. Between May 28, 2019 and August 31, 2019, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or administered Tetracycline, Lasix, Thyro-L powder, Bute injection, Electrolytes + Vits, and Methocarbamol injection to equine patient H. R.

1 98. Between June 4, 2019 and August 30, 2019, without performing an examination and
2 forming a diagnosis of any condition that required treatment, Respondent prescribed, dispensed,
3 or administered Dorm/Torb, Lasix, Thyro-L powder, and Bute paste to equine patient R.

4 99. Between October 18, 2019 and November 3, 2019, without performing an
5 examination and forming a diagnosis of any condition that required treatment, Respondent
6 prescribed, dispensed, or administered Bute injection, Bute paste, Acepromazine injection, Lasix,
7 Thyro-L powder, E-SE, Dexamethasone, Legend IV, Methocarbamol, fluid therapy, Vit. Booster,
8 and Banamine to equine patient B. N.

9 100. On or about March 12, 2020, without performing an examination and forming a
10 diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or
11 administered Bute, Electrolytes + Vits, Adequan and Methocarbamol to equine patient V. S.

12 101. On or about March 12, 2020, without performing an examination and forming a
13 diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or
14 administered Bute, Electrolytes + Vits, Adequan and Methocarbamol to equine patient B. H.

15 102. On or about March 12, 2020, without performing an examination and forming a
16 diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or
17 administered Bute, Electrolytes + Vits, Adequan and Methocarbamol to equine patient J.

18 103. On or about March 14, 2020, without performing an examination and forming a
19 diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or
20 administered Tetracycline to equine patient M. W.

21 104. On or about March 15, 2020, without performing an examination and forming a
22 diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or
23 administered Vit Booster and Fluid Therapy to equine patient L. W.

24 105. On or about March 15, 2020, without performing an examination and forming a
25 diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or
26 administered Vit Booster and Fluid Therapy to equine patient M. K.

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1 106. On or about March 15, 2020, without performing an examination and forming a
2 diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or
3 administered Ace and Bute to equine patient L. H.

4 107. On or about March 15, 2020, without performing an examination and forming a
5 diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or
6 administered Ace to equine patient S. J.

7 108. On or about March 16, 2020, without performing an examination and forming a
8 diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or
9 administered Dorm/Torb to equine patient B.

10 109. On or about March 17, 2020, without performing an examination and forming a
11 diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or
12 administered Methocarbamol, Bute and E-SE to equine patient M. H.

13 110. On or about March 17, 2020, without performing an examination and forming a
14 diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or
15 administered Methocarbamol, Bute and E-SE to equine patient W. S.

16 111. On or about March 17, 2020, without performing an examination and forming a
17 diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or
18 administered Baytril to equine patient S. I.

19 112. On or about March 17, 2020, without performing an examination and forming a
20 diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or
21 administered Bute and Adequan to equine patient B. B.

22 113. On or about March 17, 2020, without performing an examination and forming a
23 diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or
24 administered Bute, E-SE, and Adequan to equine patient J. Z.

25 114. On or about March 17, 2020, without performing an examination and forming a
26 diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or
27 administered Methocarbamol, Bute, and E-SE to equine patient M. H.

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115. On or about March 17, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or administered Methocarbamol, Bute, and E-SE to equine patient W. S.

116. On or about March 17, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or administered Bute to equine patient D.

117. On or about March 17, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or administered Ace to equine patient S. J.

118. On or about March 17, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or administered Bute to equine patient N. T.

119. On or about March 17, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or administered Bute to equine patient J. G.

120. On or about March 19, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or administered Bute to equine patient N. T.

121. On or about March 24, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or administered Banamine and Adequan to equine patient B. B.

122. On or about March 24, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or administered Methocarbamol, Bute, and E-SE to equine patient M. H.

123. On or about March 25, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or administered GastroGard to equine patient B. B.

124. On or about March 31, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or administered Ace to equine patient S. J.

125. On or about April 21, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or administered Ace to equine patient S. J.

126. On or about April 21, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent prescribed, dispensed, or administered Ace to equine patient N. T.

SECOND CAUSE FOR DISCIPLINE

(Unprofessional Conduct – Dispensing Dangerous Drugs Without Medical Necessity)

127. Respondent is subject to disciplinary action for unprofessional conduct under section 4883, subdivision (g)(3), for violating section 4170, subdivision (a)(2). Respondent dispensed unnecessary dangerous drugs to equine patients, as follows:

128. Between January 4, 2019 and September 14, 2019, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Lasix, Ace injection, Naquasone paste, Adequan, Surpass cream, Banamine paste, Panolog ointment, Carbocaine and Vetalog injection, and nerve block to equine patient F. S.

129. Between January 10, 2019 and August 30, 2019, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Vit. Booster, Methocarbamol, Omeprazole paste, Acepromazine, Tucoprim, Albuterol syrup, Ranitidine, Azium powder, Lasix, Ketofen, Bute injection, Bute powder, Prednisolone, Electrolytes + Vits, Thyro-L powder, Electrolyte paste, and Uniprim to equine patient W. D.

130. Between January 22, 2019 and October 2, 2019, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Dorm/Torb, Lasix, and Thyro-L powder to equine patient P. L.

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131. Between January 23, 2019 and June 5, 2019, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed GastroGard, Ranitidine, Lasix, Thyro-L powder, Bute, Adequan, and DMSO to equine patient A. L.

132. Between January 29, 2019 and August 19, 2019, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Ranitidine, Lasix, Thyro-L powder, Bute injection, Adequan, Methocarbamol injection, Vit. Booster, Dorm/Torb and DMSO to equine patient V. St.

133. Between May 28, 2019 and August 31, 2019, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Tetracycline, Lasix, Thyro-L powder, Bute injection, Electrolytes + Vits, and Methocarbamol injection to equine patient H. R.

134. Between March 28, 2019 and August 9, 2019, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Lasix, Glycopyrulate, Bute injection, Dorm/Torb, and Thyro-L powder to equine patient I. T.

135. Between June 4, 2019 and August 30, 2019, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Dorm/Torb, Lasix, Thyro-L powder, and Bute paste to equine patient R.

136. Between October 18, 2019 and November 3, 2019, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Bute injection, Bute paste, Acepromazine injection, Lasix, Thyro-L powder, E-SE, Dexamethasone, Legend IV, Methocarbamol, fluid therapy, Vit. Booster, and Banamine to equine patient B. N.

137. On or about March 12, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Bute, Electrolytes + Vits, Adequan and Methocarbamol to equine patient V. S.

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138. On or about March 12, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Bute, Electrolytes + Vits, Adequan and Methocarbamol to equine patient B. H.

139. On or about March 12, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Bute, Electrolytes + Vits, Adequan and Methocarbamol to equine patient J.

140. On or about March 14, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Tetracycline to equine patient M. W.

141. On or about March 15, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Vit Booster and Fluid Therapy to equine patient L. W.

142. On or about March 15, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Vit Booster and Fluid Therapy to equine patient M. K.

143. On or about March 15, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Ace to equine patient L. H.

144. On or about March 15, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Ace to equine patient S. J.

145. On or about March 16, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Dorm/Torb to equine patient B.

146. On or about March 17, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Methocarbamol, Bute and E-SE to equine patient M. H.

1 147. On or about March 17, 2020, without performing an examination and forming a
2 diagnosis of any condition that required treatment, Respondent dispensed Methocarbamol, Bute
3 and E-SE to equine patient W. S.

4 148. On or about March 17, 2020, without performing an examination and forming a
5 diagnosis of any condition that required treatment, Respondent dispensed Baytril to equine patient
6 S. I.

7 149. On or about March 17, 2020, without performing an examination and forming a
8 diagnosis of any condition that required treatment, Respondent dispensed Bute and Adequan to
9 equine patient B. B.

10 150. On or about March 17, 2020, without performing an examination and forming a
11 diagnosis of any condition that required treatment, Respondent dispensed Methocarbamol, Bute
12 and E-SE to equine patient J. Z.

13 151. On or about March 17, 2020, without performing an examination and forming a
14 diagnosis of any condition that required treatment, Respondent dispensed Methocarbamol, Bute
15 and E-SE to equine patient M. H.

16 152. On or about March 17, 2020, without performing an examination and forming a
17 diagnosis of any condition that required treatment, Respondent dispensed Methocarbamol, Bute
18 and E-SE to equine patient W. S.

19 153. On or about March 17, 2020, without performing an examination and forming a
20 diagnosis of any condition that required treatment, Respondent dispensed Bute to equine patient
21 D.

22 154. On or about March 17, 2020, without performing an examination and forming a
23 diagnosis of any condition that required treatment, Respondent dispensed Ace to equine patient
24 S. J.

25 155. On or about March 17, 2020, without performing an examination and forming a
26 diagnosis of any condition that required treatment, Respondent dispensed Bute to equine patient
27 N. T.
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156. On or about March 19, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Bute to equine patient J. G.

157. On or about March 24, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Banamine and Adequan to equine patient B. B.

158. On or about March 24, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Methocarbamol, Bute and E-SE to equine patient J. Z.

159. On or about March 24, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Methocarbamol, Bute and E-SE to equine patient M. H.

160. On or about March 25, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed GastroGard to equine patient B. B.

161. On or about March 31, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Ace to equine patient S. J.

162. On or about April 21, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Ace to equine patient S. J.

163. On or about March 21, 2020, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Ace to equine patient N. T.

164. On or about January 1, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to three (3) equine patients.

1 165. On or about January 2, 2021, without performing an examination and forming a
2 diagnosis of any condition that required treatment, Respondent dispensed Ulcer power to twelve
3 (12) equine patients.

4 166. On or about January 5, 2021, without performing an examination and forming a
5 diagnosis of any condition that required treatment, Respondent dispensed Dantrolene liquid to
6 four (4) equine patients.

7 167. On or about January 1, 2021, without performing an examination and forming a
8 diagnosis of any condition that required treatment, Respondent dispensed DMSO to three (3)
9 equine patients.

10 168. On or about January 6, 2021, without performing an examination and forming a
11 diagnosis of any condition that required treatment, Respondent dispensed DMSO to four (4)
12 equine patients.

13 169. On or about January 7, 2021, without performing an examination and forming a
14 diagnosis of any condition that required treatment, Respondent dispensed DMSO to eight (8)
15 equine patients.

16 170. On or about January 8, 2021, without performing an examination and forming a
17 diagnosis of any condition that required treatment, Respondent dispensed DMSO to five (5)
18 equine patients.

19 171. On or about January 9, 2021, without performing an examination and forming a
20 diagnosis of any condition that required treatment, Respondent dispensed EPM Drench to eight
21 (8) equine patients.

22 172. On or about January 13, 2021, without performing an examination and forming a
23 diagnosis of any condition that required treatment, Respondent dispensed DMSO to five (5)
24 equine patients.

25 173. On or about January 14, 2021, without performing an examination and forming a
26 diagnosis of any condition that required treatment, Respondent dispensed DMSO to seven (7)
27 equine patients.
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174. On or about January 15, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to four (4) equine patients.

175. On or about January 15, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed CO to fifteen (15) equine patients.

176. On or about January 15, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Yunnan Paiyo Bleeder Formula X10 to forty-nine (49) equine patients.

177. On or about January 19, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Dantrolene liquid to forty-five (45) equine patients.

178. On or about January 19, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Bute/Cort to thirty-four (34) equine patients.

179. On or about January 20, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to four (4) equine patients.

180. On or about January 21, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to five (5) equine patients.

181. On or about January 22, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to three (3) equine patients.

182. On or about January 28, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to three (3) equine patients.

183. On or about January 29, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to four (4) equine patients.

184. On or about February 3, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to three (3) equine patients.

185. On or about February 4, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to eight (8) equine patients.

186. On or about February 5, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to four (4) equine patients.

187. On or about February 11, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to three (3) equine patients.

188. On or about February 12, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to three (3) equine patients.

189. On or about February 12, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Yunnan Paiyo X10 to forty-five (45) equine patients.

190. On or about February 17, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to three (3) equine patients.

191. On or about February 18, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to three (3) equine patients.

192. On or about February 18, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Dantrolene liquid to fifty-six (56) equine patients.

193. On or about February 24, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to three (3) equine patients.

194. On or about February 25, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to four (4) equine patients.

195. On or about February 27, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Ulcer powder to eleven (11) equine patients.

196. On or about March 4, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to four (4) equine patients.

197. On or about March 5, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to three (3) equine patients.

198. On or about March 11, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to seven (7) equine patients.

199. On or about March 12, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to four (4) equine patients.

200. On or about March 12, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Yunnan Paiyo Herb Supplement to forty-five (45) equine patients.

201. On or about March 16, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Yunnan Paiyo to eight (8) equine patients.

202. On or about March 17, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to four (4) equine patients.

203. On or about March 18, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to seven (7) equine patients.

204. On or about March 19, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to three (3) equine patients.

205. On or about March 19, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Bute/Cort to fifty-eight (58) equine patients.

206. On or about March 19, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed Dantrolene liquid to fifty-eight (58) equine patients.

207. On or about March 25, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to three (3) equine patients.

208. On or about March 26, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent dispensed DMSO to three (3) equine patients.

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THIRD CAUSE FOR DISCIPLINE**(Unprofessional Conduct – Prescribing Controlled Substances)**

209. Respondent is subject to disciplinary action under section 4883, subdivision (g)(3), for violating Health and Safety Code section 11153, subdivision (a), for prescribing controlled substances without a legitimate medical purpose, as follows:

210. On or about March 16, 2020, Respondent prescribed Dorm/Torb for equine patient B.

FOURTH CAUSE FOR DISCIPLINE**(Unprofessional Conduct – Failure to Establish a Veterinarian-Client-Patient Relationship)**

211. Respondent is subject to disciplinary action for unprofessional conduct under section 4883, subdivisions (g) and (o), and CCR, title 16, section 2032.1, subsection (a).

Respondent did not establish a veterinarian-client-patient relationship before administering, prescribing, dispensing, or furnishing a drug, medicine, application, or treatment, as follows:

212. As set forth in paragraphs 91 through 210 above, incorporated here by reference, Respondent prescribed, dispensed, or administered drugs to equine patients, without establishing a veterinarian-client-patient relationship. Respondent did not: (1) perform and/or document an examination of the patients; (2) form and/or document a diagnoses of any condition that required treatment; or (3) communicate and/or document the appropriate course of treatment with the client.

FIFTH CAUSE FOR DISCIPLINE**(Violation of Veterinary Medicine Practice Act and Board Regulations – Recordkeeping)**

213. Respondent is subject to disciplinary action under section 4883, subdivisions (c) and (o), for failing to keep written records containing the information required under section 4855 and CCR, title 16, section 2032.3, for equine patients receiving veterinary services, as follows:

214. The records for equine patient V. St., dated between January 1, 2019 and December 19, 2019, failed to include the following information:

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- a. A history or pertinent information as it pertains to the equine patient's medical status as required under CCR, title 16, section 2032.3, subsection (a)(6);
- b. Data, including that obtained by instrumentation, from the physical examination of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(7);
- c. Treatment and intended treatment plan, including medication dosages as required under CCR, title 16, section 2032.3, subsection (a)(8);
- d. Diagnosis or assessment prior to performing a treatment or procedure as required under CCR, title 16, section 2032.3, subsection (a)(10); and
- e. A prognosis of the animal's condition as required under CCR, title 16, section 2032.3, subsection (a)(11).

215. The records for equine patient F. S., dated between January 4, 2019 and October 11, 2019, failed to include the following information:

- a. A history or pertinent information as it pertains to the equine patient's medical status as required under CCR, title 16, section 2032.3, subsection (a)(6);
- b. Data, including that obtained by instrumentation, from the physical examination of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(7);
- c. Treatment and intended treatment plan, including medication dosages as required under CCR, title 16, section 2032.3, subsection (a)(8);
- d. Diagnosis or assessment prior to performing a treatment or procedure as required under CCR, title 16, section 2032.3, subsection (a)(10); and
- e. A prognosis of the animal's condition as required under CCR, title 16, section 2032.3, subsection (a)(11).

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1 216. The records for equine patient W. D., dated between January 10, 2019 and February
2 2, 2021, failed to include the following information:

- 3 a. A history or pertinent information as it pertains to the equine patient's
4 medical status as required under CCR, title 16, section 2032.3, subsection
5 (a)(6);
- 6 b. Data, including that obtained by instrumentation, from the physical
7 examination of the equine patient as required under CCR, title 16, section
8 2032.3, subsection (a)(7);
- 9 c. Treatment and intended treatment plan, including medication dosages as
10 required under CCR, title 16, section 2032.3, subsection (a)(8);
- 11 d. Diagnosis or assessment prior to performing a treatment or procedure as
12 required under CCR, title 16, section 2032.3, subsection (a)(10); and
- 13 e. A prognosis of the animal's condition as required under CCR, title 16,
14 section 2032.3, subsection (a)(11).

15 217. The records for equine patient P. L., dated between January 22, 2019 and January 7,
16 2020, failed to include the following information:

- 17 a. A history or pertinent information as it pertains to the equine patient's
18 medical status as required under CCR, title 16, section 2032.3, subsection
19 (a)(6);
- 20 b. Data, including that obtained by instrumentation, from the physical
21 examination of the equine patient as required under CCR, title 16, section
22 2032.3, subsection (a)(7);
- 23 c. Treatment and intended treatment plan, including medication dosages as
24 required under CCR, title 16, section 2032.3, subsection (a)(8);
- 25 d. Diagnosis or assessment prior to performing a treatment or procedure as
26 required under CCR, title 16, section 2032.3, subsection (a)(10); and
- 27 e. A prognosis of the animal's condition as required under CCR, title 16,
28 section 2032.3, subsection (a)(11).

1 218. The records for equine patient A. L., dated between January 23, 2019 and June 5,
2 2019, failed to include the following information:

- 3 a. A history or pertinent information as it pertains to the equine patient's
4 medical status as required under CCR, title 16, section 2032.3, subsection
5 (a)(6);
- 6 b. Data, including that obtained by instrumentation, from the physical
7 examination of the equine patient as required under CCR, title 16, section
8 2032.3, subsection (a)(7);
- 9 c. Diagnosis or assessment prior to performing a treatment or procedure as
10 required under CCR, title 16, section 2032.3, subsection (a)(10); and
- 11 d. A prognosis of the animal's condition as required under CCR, title 16,
12 section 2032.3, subsection (a)(11).

13 219. The records for equine patient I. T., dated between March 28, 2019 and August 30,
14 2019, failed to include the following information:

- 15 a. A history or pertinent information as it pertains to the equine patient's
16 medical status as required under CCR, title 16, section 2032.3, subsection
17 (a)(6);
- 18 b. Data, including that obtained by instrumentation, from the physical
19 examination of the equine patient as required under CCR, title 16, section
20 2032.3, subsection (a)(7);
- 21 c. Treatment and intended treatment plan, including medication dosages as
22 required under CCR, title 16, section 2032.3, subsection (a)(8);
- 23 d. Diagnosis or assessment prior to performing a treatment or procedure as
24 required under CCR, title 16, section 2032.3, subsection (a)(10); and
- 25 e. A prognosis of the animal's condition as required under CCR, title 16,
26 section 2032.3, subsection (a)(11).

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1 220. The records for equine patient H. R., dated between May 28, 2019 and August 31,
2 2019, failed to include the following information:

- 3 a. A history or pertinent information as it pertains to the equine patient's
4 medical status as required under CCR, title 16, section 2032.3, subsection
5 (a)(6);
- 6 b. Data, including that obtained by instrumentation, from the physical
7 examination of the equine patient as required under CCR, title 16, section
8 2032.3, subsection (a)(7);
- 9 c. Treatment and intended treatment plan, including medication dosages as
10 required under CCR, title 16, section 2032.3, subsection (a)(8);
- 11 d. Diagnosis or assessment prior to performing a treatment or procedure as
12 required under CCR, title 16, section 2032.3, subsection (a)(10); and
- 13 e. A prognosis of the animal's condition as required under CCR, title 16,
14 section 2032.3, subsection (a)(11).

15 221. The records for equine patient R., dated between June 4, 2019 and August 30, 2019,
16 failed to include the following information:

- 17 a. A history or pertinent information as it pertains to the equine patient's
18 medical status as required under CCR, title 16, section 2032.3, subsection
19 (a)(6);
- 20 b. Data, including that obtained by instrumentation, from the physical
21 examination of the equine patient as required under CCR, title 16, section
22 2032.3, subsection (a)(7);
- 23 c. Treatment and intended treatment plan, including medication dosages as
24 required under CCR, title 16, section 2032.3, subsection (a)(8);
- 25 d. Diagnosis or assessment prior to performing a treatment or procedure as
26 required under CCR, title 16, section 2032.3, subsection (a)(10); and
- 27 e. A prognosis of the animal's condition as required under CCR, title 16,
28 section 2032.3, subsection (a)(11).

1 222. The records for equine patient B. N., dated between October 18, 2019 and
2 November 3, 2019, failed to include the following information:

- 3 a. A history or pertinent information as it pertains to the equine patient's
4 medical status as required under CCR, title 16, section 2032.3, subsection
5 (a)(6);
- 6 b. Data, including that obtained by instrumentation, from the physical
7 examination of the equine patient as required under CCR, title 16, section
8 2032.3, subsection (a)(7);
- 9 c. Treatment and intended treatment plan, including medication dosages as
10 required under CCR, title 16, section 2032.3, subsection (a)(8);
- 11 d. Diagnosis or assessment prior to performing a treatment or procedure as
12 required under CCR, title 16, section 2032.3, subsection (a)(10); and
- 13 e. A prognosis of the animal's condition as required under CCR, title 16,
14 section 2032.3, subsection (a)(11).

15 223. The records for equine patient V. S., dated on or about March 12, 2020, failed to
16 include the following information:

- 17 a. Age, sex, breed, species, and color of the equine patient as required under
18 CCR, title 16, section 2032.3, subsection (a)(4);
- 19 b. A history or pertinent information as it pertains to the equine patient's
20 medical statutes as required under CCR, title 16, section 2032.3, subsection
21 (a)(6);
- 22 c. Data, including that obtained by instrumentation, from the physical
23 examination of the equine patient as required under CCR, title 16, section
24 2032.3, subsection (a)(7);
- 25 d. Treatment and intended treatment plan, including medication dosages as
26 required under CCR, title 16, section 2032.3, subsection (a)(8);
- 27 e. Diagnosis or assessment prior to performing a treatment or procedure as
28 required under CCR, title 16, section 2032.3, subsection (a)(10);

- f. A prognosis of the animal's condition as required under CCR, title 16, section 2032.3, subsection (a)(11); and
- g. For each medication prescribed and dispensed, the strength, dosage, route of administration, and frequency of use as required under CCR, title 16, section 2032.3, subsection (a)(12).

224. The records for equine patient B. H., dated on or about March 12, 2020, failed to include the following information:

- a. Age, sex, breed, species, and color of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(4);
- b. A history or pertinent information as it pertains to the equine patient's medical status as required under CCR, title 16, section 2032.3, subsection (a)(6);
- c. Data, including that obtained by instrumentation, from the physical examination of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(7);
- d. Treatment and intended treatment plan, including medication dosages as required under CCR, title 16, section 2032.3, subsection (a)(8);
- e. Diagnosis or assessment prior to performing a treatment or procedure as required under CCR, title 16, section 2032.3, subsection (a)(10);
- f. A prognosis of the animal's condition as required under CCR, title 16, section 2032.3, subsection (a)(11); and
- g. For each medication prescribed and dispensed, the strength, dosage, route of administration, and frequency of use as required under CCR, title 16, section 2032.3, subsection (a)(12).

225. The records for equine patient J., dated on or about March 12, 2020, failed to include the following information:

- a. Age, sex, breed, species, and color of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(4);

- b. A history or pertinent information as it pertains to the equine patient's medical status as required under CCR, title 16, section 2032.3, subsection (a)(6);
- c. Data, including that obtained by instrumentation, from the physical examination of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(7);
- d. Treatment and intended treatment plan, including medication dosages as required under CCR, title 16, section 2032.3, subsection (a)(8);
- e. Diagnosis or assessment prior to performing a treatment or procedure as required under CCR, title 16, section 2032.3, subsection (a)(10);
- f. A prognosis of the animal's condition as required under CCR, title 16, section 2032.3, subsection (a)(11); and
- g. For each medication prescribed and dispensed, the strength, dosage, route of administration, and frequency of use as required under CCR, title 16, section 2032.3, subsection (a)(12).

226. The records for equine patient M. W., dated on or about March 14, 2020, failed to include the following information:

- a. Age, sex, breed, species, and color of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(4);
- b. A history or pertinent information as it pertains to the equine patient's medical status as required under CCR, title 16, section 2032.3, subsection (a)(6);
- c. Data, including that obtained by instrumentation, from the physical examination of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(7);
- d. Treatment and intended treatment plan, including medication dosages as required under CCR, title 16, section 2032.3, subsection (a)(8);

- e. Diagnosis or assessment prior to performing a treatment or procedure as required under CCR, title 16, section 2032.3, subsection (a)(10);
- f. A prognosis of the animal's condition as required under CCR, title 16, section 2032.3, subsection (a)(11); and
- g. For each medication prescribed and dispensed, the strength, dosage, route of administration, and frequency of use as required under CCR, title 16, section 2032.3, subsection (a)(12).

227. The records for equine patient I. L., dated on or about March 14, 2020, failed to include the following information:

- a. Age, sex, breed, species, and color of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(4);
- b. A history or pertinent information as it pertains to the equine patient's medical status as required under CCR, title 16, section 2032.3, subsection (a)(6);
- c. Data, including that obtained by instrumentation, from the physical examination of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(7);
- d. Treatment and intended treatment plan, including medication dosages as required under CCR, title 16, section 2032.3, subsection (a)(8);
- e. Diagnosis or assessment prior to performing a treatment or procedure as required under CCR, title 16, section 2032.3, subsection (a)(10);
- f. A prognosis of the animal's condition as required under CCR, title 16, section 2032.3, subsection (a)(11); and
- g. For each medication prescribed and dispensed, the strength, dosage, route of administration, and frequency of use as required under CCR, title 16, section 2032.3, subsection (a)(12).

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1 228. The records for equine patient M., dated on or about March 15, 2020, failed to
2 include the following information:

- 3 a. Age, sex, breed, species, and color of the equine patient as required under
4 CCR, title 16, section 2032.3, subsection (a)(4);
- 5 b. A history or pertinent information as it pertains to the equine patient's
6 medical status as required under CCR, title 16, section 2032.3, subsection
7 (a)(6);
- 8 c. Data, including that obtained by instrumentation, from the physical
9 examination of the equine patient as required under CCR, title 16, section
10 2032.3, subsection (a)(7);
- 11 d. Treatment and intended treatment plan, including medication dosages as
12 required under CCR, title 16, section 2032.3, subsection (a)(8);
- 13 e. Diagnosis or assessment prior to performing a treatment or procedure as
14 required under CCR, title 16, section 2032.3, subsection (a)(10);
- 15 f. A prognosis of the animal's condition as required under CCR, title 16,
16 section 2032.3, subsection (a)(11); and
- 17 g. For each medication prescribed and dispensed, the strength, dosage, route
18 of administration, and frequency of use as required under CCR, title 16,
19 section 2032.3, subsection (a)(12).

20 229. The records for equine patient L. W., dated on or about March 15, 2020, failed to
21 include the following information:

- 22 a. Age, sex, breed, species, and color of the equine patient as required under
23 CCR, title 16, section 2032.3, subsection (a)(4);
- 24 b. A history or pertinent information as it pertains to the equine patient's
25 medical status as required under CCR, title 16, section 2032.3, subsection
26 (a)(6);

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- c. Data, including that obtained by instrumentation, from the physical examination of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(7);
- d. Treatment and intended treatment plan, including medication dosages as required under CCR, title 16, section 2032.3, subsection (a)(8);
- e. Diagnosis or assessment prior to performing a treatment or procedure as required under CCR, title 16, section 2032.3, subsection (a)(10);
- f. A prognosis of the animal's condition as required under CCR, title 16, section 2032.3, subsection (a)(11); and
- g. For each medication prescribed and dispensed, the strength, dosage, route of administration, and frequency of use as required under CCR, title 16, section 2032.3, subsection (a)(12).

230. The records for equine patient L. H., dated on or about March 15, 2020, failed to include the following information:

- a. Age, sex, breed, species, and color of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(4);
- b. A history or pertinent information as it pertains to the equine patient's medical status as required under CCR, title 16, section 2032.3, subsection (a)(6);
- c. Data, including that obtained by instrumentation, from the physical examination of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(7);
- d. Treatment and intended treatment plan, including medication dosages as required under CCR, title 16, section 2032.3, subsection (a)(8);
- e. Diagnosis or assessment prior to performing a treatment or procedure as required under CCR, title 16, section 2032.3, subsection (a)(10);
- f. A prognosis of the animal's condition as required under CCR, title 16, section 2032.3, subsection (a)(11); and

- 1 g. For each medication prescribed and dispensed, the strength, dosage, route
2 of administration, and frequency of use as required under CCR, title 16,
3 section 2032.3, subsection (a)(12).

4 231. The records for equine patient B., dated on or about March 16, 2020, failed to
5 include the following information:

- 6 a. Age, sex, breed, species, and color of the equine patient as required under
7 CCR, title 16, section 2032.3, subsection (a)(4);
8 b. A history or pertinent information as it pertains to the equine patient's
9 medical status as required under CCR, title 16, section 2032.3, subsection
10 (a)(6);
11 c. Data, including that obtained by instrumentation, from the physical
12 examination of the equine patient as required under CCR, title 16, section
13 2032.3, subsection (a)(7);
14 d. Treatment and intended treatment plan, including medication dosages as
15 required under CCR, title 16, section 2032.3, subsection (a)(8);
16 e. Diagnosis or assessment prior to performing a treatment or procedure as
17 required under CCR, title 16, section 2032.3, subsection (a)(10);
18 f. A prognosis of the animal's condition as required under CCR, title 16,
19 section 2032.3, subsection (a)(11); and
20 g. For each medication prescribed and dispensed, the strength, dosage, route
21 of administration, and frequency of use as required under CCR, title 16,
22 section 2032.3, subsection (a)(12).

23 232. The records for equine patient M. H., dated on or about March 17, 2020, failed to
24 include the following information:

- 25 a. Age, sex, breed, species, and color of the equine patient as required under
26 CCR, title 16, section 2032.3, subsection (a)(4);

27 ////

28 ////

- b. A history or pertinent information as it pertains to the equine patient's medical status as required under CCR, title 16, section 2032.3, subsection (a)(6);
- c. Data, including that obtained by instrumentation, from the physical examination of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(7);
- d. Treatment and intended treatment plan, including medication dosages as required under CCR, title 16, section 2032.3, subsection (a)(8);
- e. Diagnosis or assessment prior to performing a treatment or procedure as required under CCR, title 16, section 2032.3, subsection (a)(10);
- f. A prognosis of the animal's condition as required under CCR, title 16, section 2032.3, subsection (a)(11); and
- g. For each medication prescribed and dispensed, the strength, dosage, route of administration, and frequency of use as required under CCR, title 16, section 2032.3, subsection (a)(12).

233. The records for equine patient W. S., dated on or about March 17, 2020, failed to include the following information:

- a. Age, sex, breed, species, and color of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(4);
- b. A history or pertinent information as it pertains to the equine patient's medical status as required under CCR, title 16, section 2032.3, subsection (a)(6);
- c. Data, including that obtained by instrumentation, from the physical examination of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(7);
- d. Treatment and intended treatment plan, including medication dosages as required under CCR, title 16, section 2032.3, subsection (a)(8);

- e. Diagnosis or assessment prior to performing a treatment or procedure as required under CCR, title 16, section 2032.3, subsection (a)(10);
- f. A prognosis of the animal's condition as required under CCR, title 16, section 2032.3, subsection (a)(11); and
- g. For each medication prescribed and dispensed, the strength, dosage, route of administration, and frequency of use as required under CCR, title 16, section 2032.3, subsection (a)(12).

234. The records for equine patient S. I., dated on or about March 17, 2020, failed to include the following information:

- a. A history or pertinent information as it pertains to the equine patient's medical status as required under CCR, title 16, section 2032.3, subsection (a)(6);
- b. Data, including that obtained by instrumentation, from the physical examination of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(7);
- c. Diagnosis or assessment prior to performing a treatment or procedure as required under CCR, title 16, section 2032.3, subsection (a)(10); and
- d. A prognosis of the animal's condition as required under CCR, title 16, section 2032.3, subsection (a)(11).

235. The records for equine patient B. B., dated on or about March 17, 2020, failed to include the following information:

- a. A history or pertinent information as it pertains to the equine patient's medical status as required under CCR, title 16, section 2032.3, subsection (a)(6);
- b. Data, including that obtained by instrumentation, from the physical examination of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(7);

- c. Diagnosis or assessment prior to performing a treatment or procedure as required under CCR, title 16, section 2032.3, subsection (a)(10); and
- d. A prognosis of the animal's condition as required under CCR, title 16, section 2032.3, subsection (a)(11).

236. The records for equine patient J. Z., dated on or about March 17, 2020, failed to include the following information:

- a. A history or pertinent information as it pertains to the equine patient's medical status as required under CCR, title 16, section 2032.3, subsection (a)(6);
- b. Data, including that obtained by instrumentation, from the physical examination of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(7);
- c. Diagnosis or assessment prior to performing a treatment or procedure as required under CCR, title 16, section 2032.3, subsection (a)(10); and
- d. A prognosis of the animal's condition as required under CCR, title 16, section 2032.3, subsection (a)(11).

237. The records for equine patient M. H., dated on or about March 17, 2020, and March 24, 2020 failed to include the following information:

- a. A history or pertinent information as it pertains to the equine patient's medical status as required under CCR, title 16, section 2032.3, subsection (a)(6);
- b. Data, including that obtained by instrumentation, from the physical examination of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(7);
- c. Diagnosis or assessment prior to performing a treatment or procedure as required under CCR, title 16, section 2032.3, subsection (a)(10); and
- d. A prognosis of the animal's condition as required under CCR, title 16, section 2032.3, subsection (a)(11).

1 238. The records for equine patient W. S., dated on or about March 17, 2020, failed to
2 include the following information:

- 3 a. A history or pertinent information as it pertains to the equine patient's
4 medical status as required under CCR, title 16, section 2032.3, subsection
5 (a)(6);
- 6 b. Data, including that obtained by instrumentation, from the physical
7 examination of the equine patient as required under CCR, title 16, section
8 2032.3, subsection (a)(7);
- 9 c. Diagnosis or assessment prior to performing a treatment or procedure as
10 required under CCR, title 16, section 2032.3, subsection (a)(10); and
- 11 d. A prognosis of the animal's condition as required under CCR, title 16,
12 section 2032.3, subsection (a)(11).

13 239. The records for equine patient D., dated on or about March 17, 2020, failed to
14 include the following information:

- 15 a. A history or pertinent information as it pertains to the equine patient's
16 medical status as required under CCR, title 16, section 2032.3, subsection
17 (a)(6);
- 18 b. Data, including that obtained by instrumentation, from the physical
19 examination of the equine patient as required under CCR, title 16, section
20 2032.3, subsection (a)(7);
- 21 c. Diagnosis or assessment prior to performing a treatment or procedure as
22 required under CCR, title 16, section 2032.3, subsection (a)(10); and
- 23 d. A prognosis of the animal's condition as required under CCR, title 16,
24 section 2032.3, subsection (a)(11).

25 240. The records for equine patient S. J., dated on or about March 15, 2020, March 17,
26 2020, March 31, 2020, and April 21, 2020, failed to include the following information:

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28 ///

- a. A history or pertinent information as it pertains to the equine patient's medical status as required under CCR, title 16, section 2032.3, subsection (a)(6);
- b. Data, including that obtained by instrumentation, from the physical examination of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(7);
- c. Diagnosis or assessment prior to performing a treatment or procedure as required under CCR, title 16, section 2032.3, subsection (a)(10); and
- d. A prognosis of the animal's condition as required under CCR, title 16, section 2032.3, subsection (a)(11).

241. The records for equine patient N. T., dated on or about March 17, 2020, March 19, 2020, and April 21, 2020, failed to include the following information:

- a. A history or pertinent information as it pertains to the equine patient's medical status as required under CCR, title 16, section 2032.3, subsection (a)(6);
- b. Data, including that obtained by instrumentation, from the physical examination of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(7);
- c. Diagnosis or assessment prior to performing a treatment or procedure as required under CCR, title 16, section 2032.3, subsection (a)(10); and
- d. A prognosis of the animal's condition as required under CCR, title 16, section 2032.3, subsection (a)(11).

242. The records for equine patient J. G., dated on or about March 17, 2020, failed to include the following information:

- a. A history or pertinent information as it pertains to the equine patient's medical status as required under CCR, title 16, section 2032.3, subsection (a)(6);

- b. Data, including that obtained by instrumentation, from the physical examination of the equine patient as required under CCR, title 16, section 2032.3, subsection (a)(7);
- c. Diagnosis or assessment prior to performing a treatment or procedure as required under CCR, title 16, section 2032.3, subsection (a)(10); and
- d. A prognosis of the animal's condition as required under CCR, title 16, section 2032.3, subsection (a)(11).

SIXTH CAUSE FOR DISCIPLINE

(Unprofessional Conduct – Misbranded Drugs)

243. Respondent is subject to disciplinary action for unprofessional conduct under section 4883, subdivision (g)(3), for violations of section 4169, subdivision (a)(3), and Health and Safety Code sections 111440 and 111450, for selling, delivering, holding, or offering for sale drugs that are misbranded.

244. On or about April 9, 2019, Respondent sold, delivered, held or offered Thyro-L powder to equine patient A. L.

245. On or about April 9, 2019, Respondent sold, delivered, held or offered Thyro-L powder to equine patient V. St.

246. On or about April 15, 2019, Respondent sold, delivered, held or offered Thyro-L powder to equine patient W. D.

247. Between May 8, 2019 and August 19, 2019, Respondent sold, delivered, held or offered DMSO to equine patient V. St.

248. On or about June 5, 2019, Respondent sold, delivered, held or offered DMSO to equine patient A. L.

249. On or about August 9, 2019, Respondent sold, delivered, held or offered Thyro-L powder to equine patient I. T.

250. On or about August 18, 2019, Respondent sold, delivered, held or offered Thyro-L powder to equine patient H. R.

251. Between August 18, 2019 and August 30, 2019, Respondent sold, delivered, held or offered Thyroxine L powder to equine patient P. L.

252. On or about October 18, 2019, Respondent sold, delivered, held or offered Thyro-L powder to equine patient B. N.

SEVENTH CAUSE FOR DISCIPLINE

(Unprofessional Conduct – Minimum Standards for Drug Logs)

253. Respondent is subject to disciplinary action under section 4883, subdivision (g)(3), for failing to comply with Code of Federal Regulations, title 21, section 1304.22, subsection (c), that required Respondent to maintain a log of drugs administered, dispensed and prescribed from his mobile unit operated from EMC, as follows:

254. Respondent's controlled drug administration logs submitted with his compliance documents failed to comply with required information for logs. The Veterinary Controlled Drug Disposition Record for Butorphanol, a Schedule IV drug, had the following missing information: (1) the year for all dates; and (2) client address or identification number. The Veterinary Controlled Drug Disposition Record for Midazolam, a Schedule IV drug, had the following missing information: client address or identification number. The Veterinary Controlled Drug Disposition Record for Ketamine, a Schedule III drug, had the following missing information: client address or identification number.

EIGHTH CAUSE FOR DISCIPLINE

(Unprofessional Conduct – Possession or Use of Prohibited Drugs)

255. Respondent is subject to disciplinary action under section 4883, subdivision (g)(3), for violating CCR, title 4, section 1867, subsection (b). Respondent possessed a drug, substance, or medication on the premises of a facility under the jurisdiction of CHRB that has not been approved by the FDA for use in the United States as follows²:

256. Between January 17, 2019 and August 27, 2019, Respondent possessed or used Ranitidine and Thyro-L powder for equine patient W. D.

² The equine patients were all listed on the confidential reports submitted to the CHRB. No compounded drugs are FDA approved even if compounded from FDA approved parent drugs.

1 257. On or about January 25, 2019, Respondent possessed or used Naquasone paste for
2 equine patient P. S.

3 258. Between January 29, 2019 and June 5, 2019, Respondent possessed or used
4 Ranitidine, Thyro-L powder and DMSO for equine patient A. L.

5 259. Between January 29, 2019 and August 19, 2019, Respondent possessed or used
6 Ranitidine, Thyro-L powder and DMSO for equine patient V. St.

7 260. On or about August 9, 2019, Respondent possessed or used Thyro-L powder for
8 equine patient I. T.

9 261. On or about August 18, 2019, Respondent possessed or used Thyro-L powder for
10 equine patient H. R.

11 262. On or about August 18, 2019, Respondent possessed or used Thyro-L powder for
12 equine patient P. L.

13 263. On or about August 22, 2019 and August 30, 2019, Respondent possessed or used
14 Thyro-L powder for equine patient R.

15 264. On or about October 18, 2019, Respondent possessed or used Thyro-L powder for
16 equine patient B. N.

17 265. On or about March 12, 2020, Respondent possessed or used Electrolytes + Vits for
18 equine patient V. S.

19 266. On or about March 12, 2020, Respondent possessed or used Electrolytes + Vits for
20 equine patient B. H.

21 267. On or about March 12, 2020, Respondent possessed or used Electrolytes + Vits for
22 equine patient J.

23 268. On or about March 15, 2020, Respondent possessed or used Vits Booster for equine
24 patient M.

25 269. On or about March 15, 2020, Respondent possessed or used Vits Booster for equine
26 patient L. W.

27 270. Between January 2021 and March 2021, Respondent used DMSO to treat equine
28 patients on at least 127 occasions.

271. Between January 2021 and March 2021, Respondent Byrd used Ulcer powder to treat equine patients on at least 23 occasions.

272. Between January 2021 and March 2021, Respondent used Dantrolene liquid to treat equine patients on at least 163 occasions.

273. Between January 2021 and March 2021, Respondent used EPM Drench to treat equine patients on at least 8 occasions.

274. Between January 2021 and March 2021, Respondent used CO Jug to treat equine patients on at least 15 occasions.

275. Between January 2021 and March 2021, Respondent used Yunnan Paiyo to treat equine patients on at least 147 occasions.

276. Between January 2021 and March 2021, Respondent used Bute/Cort to treat equine patients on at least 92 occasions.

NINTH CAUSE FOR DISCIPLINE

(Violation of Practice Act – Failure to Provide Required Drug Consultations)

277. Respondent is subject to disciplinary action under section 4883, subdivision (c), for failing to offer to provide and note in the medical record, the required drug consultation for prescribed, dispensed, or furnished dangerous drugs as required under section 4829.5, subdivisions (a) and (d), as follows:

278. Between January 11, 2019 and February 2, 2021, Respondent dispensed Methocarbamol, Omeprazole paste, Acepromazine, Tucoprim, Albuterol syrup, Ranitidine, Azium powder, Lasix, Ketofen, Bute injection, Bute powder, Prednisolone, Thyro-L powder, Adequan, Surpass and Uniprim to equine patient W. D. without offering to provide a consultation and noting the offer in the medical record.

279. Between January 23, 2019 and April 18, 2019, Respondent dispensed GastroGard, Ranitidine, and Thyro-L powder to equine patient A. L. without offering to provide a consultation and noting the offer in the medical record.

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280. Between January 25, 2019 and September 19, 2019, Respondent dispensed Naquasone paste, Surpass cream, Banamine paste, Panolog ointment, Bute, and Surpass to equine patient F. S. without offering to provide a consultation and noting the offer in the medical record.

281. Between January 29, 2019 and April 18, 2019, Respondent dispensed Ranitidine and Thyro-L powder to equine patient V. St. without offering to provide a consultation and noting the offer in the medical record.

282. On or about August 9, 2019, Respondent dispensed Thyro-L powder to equine patient I. T. without offering to provide a consultation and noting the offer in the medical record.

283. On or about August 18, 2019, Respondent dispensed Thyro-L powder to equine patient H. R. without offering to provide a consultation and noting the offer in the medical record.

284. On or about August 18, 2019, Respondent dispensed Thyro-L powder to equine patient P. L. without offering to provide a consultation and noting the offer in the medical record.

285. Between August 22, 2019 and August 30, 2019, Respondent dispensed Thyro-L powder and Bute paste to equine patient R. without offering to provide a consultation and noting the offer in the medical record.

286. On or about October 18, 2019, Respondent dispensed Thyro-L powder to equine patient B. N. without offering to provide a consultation and noting the offer in the medical record.

287. On or about April 2, 2020, Respondent dispensed or prescribed Surpass, Bute and Adequan to equine patient M. S. D. without offering to provide a consultation and noting the offer in the medical record.

288. On or about April 21, 2020, Respondent dispensed Surpass, Bute and Adequan to equine patient V. S. A. without offering to provide a consultation and noting the offer in the medical record.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this Accusation, and that following the hearing, the Board issue a decision:

1. Revoking or suspending Veterinarian License Number VET 15878, issued to Ryan Scott Carpenter;

2. Ordering Ryan Scott Carpenter to pay the Veterinary Medical Board the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

3. Assessing a fine against Ryan Scott Carpenter not in excess of \$5,000, for any of the causes specified in Business and Professions Code section 4883; and

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

DATED: _____

Signature on file

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

LA2021602026
65022412.docx



PROBATION COMPLIANCE REPORT

PETITIONER: Ryan Scott Carpenter, DVM, VET 15878

REPORT TYPE: Early Termination or Modification of Probation Report

CASE NUMBER: 4602021000379

PROBATIONARY TERM: Four years: June 19, 2023 – June 18, 2027

PROBATION TERMS AND CONDITIONS AND STATUS:

Obey All Laws: Compliant.

The Board has not received any notices of arrest or criminal conviction concerning Petitioner. The Board has not taken any action against Petitioner for violations of the California Veterinary Medicine Practice Act.

Quarterly Reports: Compliant.

All Quarterly Reports were submitted in a timely manner.

Interview with the Board: Compliant.

The probation intake meeting with Petitioner occurred on June 19, 2023.

Cooperation with Board Staff: Compliant.

Petitioner has responded and cooperated with probation surveillance in a timely manner when requested to respond.

Probation Monitoring Costs: Compliant.

Petitioner has paid all probation monitoring costs to date.

Changes of Employment or Address: Compliant.

Petitioner has maintained the same address and employment for the duration of probation.

No Supervision of Students, Interns, or Residents: Compliant.

No evidence has been received that Petitioner has had any preceptorships or supervision of interns during probation.

Notice to Employers: Compliant.

The Board received a Notice to Employers form from Equine Medical Center on July 14, 2023. The Board received a Notice to Employers form from Southern California Equine Foundation on July 14, 2023.

Notice to Employees: Compliant.

Notice to Employees picture obtained for Equine Medical Center on August 4, 2025 during inspection 4604250225.

Probation Compliance Report
Ryan Carpenter, DVM

Notice to Employees picture obtained for Southern California Equine Foundation on September 6, 2025, in response to a probation notice sent on September 2, 2025.

Tolling of Probation:

Petitioner has not entered tolling status during his probationary period.

Maintain a Current and Active License: Compliant.

Petitioner has maintained a valid license during probation.

Violation of Probation:

Since the effective date of the Decision, no Accusation or Petition to Revoke Probation has been filed against Petitioner for a probation violation.

A Probation Violation Letter was sent on September 2, 2025 to Petitioner for the purpose of obtaining proof that a Notice to Employee was posted at Southern California Equine Foundation. A response was received on September 6, 2025.

License Surrender While on Probation/Suspension:

Petitioner has not requested to surrender his license.

Completion of Probation.

All Probation Monitoring costs have been paid to date.

Cost Recovery: Compliant.

Petitioner proposed a payment plan on July 12, 2023. Cost Recovery was paid in full on May 12, 2024.

Inspections: Compliant.

Petitioner's mobile unit, in connection to Equine Medical Center, was inspected on September 27, 2024, and August 9, 2025. No corrections were needed from Petitioner.

Medical Record Review: Compliant.

All medical record review reports were received in a timely manner.

Continuing Education: Compliant.

The Board received a request for approval for 10 hours of record keeping and a certificate for the first year of probation.

The Board received a request for approval for 10 hours of record keeping and a certificate for the second year of probation.

The Board received requests for approval for 8 hours of record keeping and certificates for the third year of probation.

Fine: Compliant.

Petitioner's fine was paid in full on July 12, 2023.

Completed by: Alexander Juarez Signature: _____ Date: December 24, 2025



VIA ELECTRONIC, CERTIFIED & US MAIL

September 2, 2025

Dr. Ryan Scott Carpenter
PO Box 1491
Sierra Madre, CA 91025-4491
rscarpenter@gmail.com

Re: PROBATION VIOLATION LETTER
Case No. 4602021000379

Dear Dr. Carpenter:

A comprehensive review of your probation file was conducted. The following items require your immediate attention:

NOTICE TO EMPLOYEES

Throughout the probationary period, and in a manner that is visible to all licensed, registered, or permitted veterinary employees at the veterinary premises, Respondent shall post a notice, provided or approved by the Board, that recites the violations for which Respondent has been disciplined and the terms and conditions of probation.

Violation: After review of the Board's records, the Board does not have proof that a notice, provided or approved by the Board, is posted at Southern California Equine Foundation.

Please submit a written letter of explanation in answer to the above-described violation along with a proposed plan to correct the violation by **September 16, 2025**. Failure to rectify any and/or all of the violations may be considered violations of your probation.

If you have any questions or concerns, please contact me via email at Alexander.Juarez@dca.ca.gov.

Regards,

Alexander A. Juarez
Probation Monitor
California Veterinary Medical Board



BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY • GAVIN NEWSOM, GOVERNOR
 DEPARTMENT OF CONSUMER AFFAIRS • CALIFORNIA VETERINARY MEDICAL BOARD
 1747 North Market Blvd., Suite 230, Sacramento, CA 95834-2987
 P (916) 515-5520 | Toll-Free (866) 229-0170 | www.vmb.ca.gov



DECLARATION OF SERVICE BY CERTIFIED MAIL

RE: Probation Violation Letter

LICENSE NO: 15878

I, the undersigned declare that I am over 18 years of age; my business address is 1747 N. Market Boulevard, Suite 230, Sacramento, CA 95834. I served a true copy of the attached letter by Certified Mail on the following, by placing same in an envelope addressed as follows:

NAME AND ADDRESS

Dr. Ryan Scott Carpenter
 PO Box 1491
 Sierra Madre, CA 91025-4491

CERTIFIED NUMBER:

9589 0710 5270 0918 6932 78

Said envelope was then, on **September 2, 2025**, sealed and deposited in the United States Mail at 1747 N. Market Boulevard, Suite 230, Sacramento, CA 95834, the county in which I am employed, as certified mail with postage thereon fully prepaid, return receipt requested.

Executed on **September 2, 2025**, at Sacramento, California.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOREGOING IS TRUE AND CORRECT.

DECLARANT:

SIGNATURE ON FILE

**Probation Monitor
 Veterinary Medical Board**

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only	
For delivery information, visit our website at www.usps.com ®.	
OFFICIAL USE	
Certified Mail Fee \$	Postmark Here
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy) \$	
<input type="checkbox"/> Return Receipt (electronic) \$	
<input type="checkbox"/> Certified Mail Restricted Delivery \$	
<input type="checkbox"/> Adult Signature Required \$	
<input type="checkbox"/> Adult Signature Restricted Delivery \$	
Postage \$	
Total Postage and \$	
Sent To	
Street and Apt. No	Dr. Ryan Scott Carpenter
City, State, ZIP+4®	PO Box 1491
	Sierra Madre, CA 91025-4491
PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions	

Juarez, Alexander@DCA

From: [REDACTED]
Sent: Saturday, September 6, 2025 7:41 PM
To: Juarez, Alexander@DCA
Subject: Re: CVMB Probation Violation Notice - Carpenter
Attachments: Carpenter response September 2025.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

This Message Is From an External Sender

WARNING: This email originated from outside of the organization! Do not click links, open attachments, or reply, unless you recognize the sender's email.

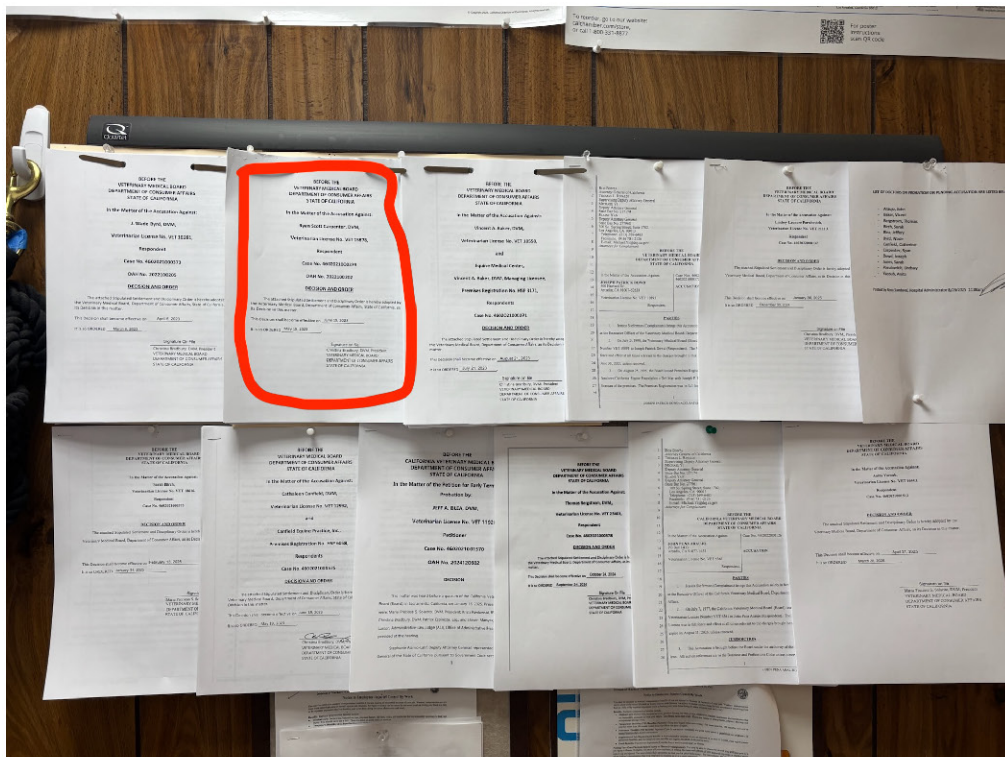
[Report Suspicious](#)

Good Evening,

See attached letter and photo as a response to your recent email. Please let me know you have received this email and if you need anything else on my end. Thank you and hope you had a nice weekend,

Ryan

Ryan Carpenter, DVM, MS, DACVS, MIS-Ortho
[REDACTED]



On Thu, Sep 4, 2025 at 8:39 AM Juarez, Alexander@DCA <Alexander.Juarez@dca.ca.gov> wrote:

Hello,

Please see the attached letter regarding a violation of probation.

I'm available via phone call if you'd like to discuss this letter or any aspect of probation.

Your response is requested by September 16, 2025.

Thanks,



Alexander A. Juarez

Probation Monitor

California Veterinary Medical Board

Department of Consumer Affairs

1747 N. Market Blvd, Suite 230

Sacramento, CA 95834

Direct: 916-905-5434 Toll Free: 866-229-0170

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EQUINE MEDICAL CENTER
10542 WALKER STREET CYPRESS, CALIFORNIA 90630
OFFICE: (714) 952-1134 FAX: (714) 952-5007

Date: September 6, 2025

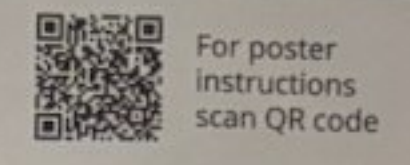
Dear Mr. Juarez,

Thank you for bringing this issue to my attention. It has always been my desire to be in full compliance with the terms of my probationary agreement throughout this process. When I received this letter, I contacted Rosa Sandoval, the SCEF hospital administrator, and instructed her to post the terms of my probationary agreement at the hospital until I instruct her to remove it. I have attached a photo of my probationary agreement that is posted at the SCEF hospital for your reference. Please let me know if this is satisfactory to the board or if I need to do anything else.

■ Please do not hesitate to contact me if you have any questions or concerns.


Ryan Carpenter, DVM, MS
Diplomate, American College of Veterinary Surgeons
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BEFORE THE
VETERINARY MEDICAL BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

J. Wade Byrd, DVM,

Veterinarian License No. VET 10381,

Respondent

Case No. 4602021000373

OAH No. 2022100205

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Veterinary Medical Board, Department of Consumer Affairs, State of California, as its Decision in this matter.

This Decision shall become effective on April 5, 2023

It is so ORDERED March 6, 2023

Signature On File
Christina Bradbury, DVM, President
VETERINARY MEDICAL BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

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

In the Matter of the Accusation Against:

Ryan Scott Carpenter, DVM,

Veterinarian License No. VET 15878,

Respondent

Case No. 4602021000379

OAH No. 2022100202

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Veterinary Medical Board, Department of Consumer Affairs, State of California, as its Decision in this matter.

This Decision shall become effective on June 19, 2023

It is so ORDERED May 19, 2023

Signature on file
Christina Bradbury, DVM, President
VETERINARY MEDICAL BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

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

In the Matter of the Accusation Against:

Vincent A. Baker, DVM,

Veterinarian License No. VET 10550,

and

Equine Medical Center,

Vincent A. Baker, DVM, Managing Licensee,

Premises Registration No. HSP 3171,

Respondents

Case No. 4602021000371

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Veterinary Medical Board, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on August 21, 2023

It is so ORDERED July 21, 2023

Signature on file
Christina Bradbury, DVM, President
VETERINARY MEDICAL BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

1 ROB BONTA
2 Attorney General of California
3 THOMAS L. RONALDI
4 Supervising Deputy Attorney General
5 MICHAEL YI
6 Deputy Attorney General
7 State Bar No. 217174
8 ELAINE YAN
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11 300 So. Spring Street, Suite 1702
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13 Telephone: (213) 269-6483
14 Facsimile: (916) 731-2126
15 E-mail: Michael.Yi@doj.ca.gov
16 Attorneys for Complainant

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

In the Matter of the Accusation Against:

JOSEPH PATRICK DOWD
400 Harvard Dr.
Arcadia, CA 91007-5268

Veterinarian License No. VET 10893

Case No. 4602021000377
4602021000377
ACCUSATION

Respondent.

PARTIES

1. Jessica Sierfman (Complainant) brings this Accusation as the Executive Officer of the Veterinary Medical Board, Department of Consumer Affairs, State of California.
2. On July 3, 1990, the Veterinary Medical Board (Board) Number VET 10893 to Joseph Patrick Dowd (Respondent). The force and effect at all times relevant to the charges brought in this June 30, 2025, unless renewed.
3. On August 25, 1995, the Board issued Premises Registration No. HSP 3171 to Vincent A. Baker, DVM, Managing Licensee, and Equine Medical Center, Vincent A. Baker, DVM, Managing Licensee, as its Decision in this matter.

(JOSEPH PATRICK DOWD) ACCUSATION

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

In the Matter of the Accusation Against:

Lindsey Leanne Porubovich,
Veterinarian License No. VET 21113.

Respondent

Case No. 4602021000132

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Veterinary Medical Board, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on January 30, 2025

It is so ORDERED December 30, 2024

Signature on File
Christina Bradbury, DVM, President
VETERINARY MEDICAL BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

LIST OF DOCTORS ON PROBATION OR PENDING ACCUSATION ARE LISTED BELOW

- Araujo, John
- Baker, Vincent
- Bergstrom, Thomas
- Birch, Sarah
- Blea, Jeffery
- Byrd, Wade
- Canfield, Catherine
- Carpenter, Ryan
- Dowd, Joseph
- Jones, Sarah
- Porubovich, Lindsay
- Yacoub, Anita

Posted by Rosa Sandoval, Hospital Administrator 8/26/2025 11:00am

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

In the Matter of the Accusation Against:

Sarah Birch,
Veterinarian License No. VET 18616.

Respondent
Case No. 4602021000375

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Veterinary Medical Board, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on February 13, 2025

It is so ORDERED January 14, 2025

Signature
Maria Preciosa S. Solacito, DVM, President
VETERINARY MEDICAL BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

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

In the Matter of the Accusation Against:

Cathleen Canfield, DVM,
Veterinarian License No. VET 12992,

and
Respondents

Canfield Equine Practice, Inc.,
Premises Registration No. HSP 6058,

Premises Registration No. HSP 6058,

Case No. 4602021001575

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Veterinary Medical Board, Department of Consumer Affairs, State of California, as its Decision in this matter.

This Decision shall become effective on June 19, 2023

It is so ORDERED May 19, 2023

Signature
Christina Bradbury, DVM, President
VETERINARY MEDICAL BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

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

In the Matter of the Petition for Early Termination of Probation by:

JEFF A. BLEA, DVM,
Veterinarian License No. VET 11921

and
Petitioner

Case No. 4602021001570

OAH No. 2024120602

DECISION

This matter was heard before a quorum of the California Veterinary Medical Board (Board) in Sacramento, California, on January 16, 2025. Present were: Maria Preciosa S. Solacito, DVM, President; Kristi Pawlowski, R; Christina Bradbury, DVM, Patrick Espinoza, Esq.; and Steven Manyak, Larson, Administrative Law Judge (ALJ), Office of Administrative Hearings, presided at the hearing.

Stephanie Alamo-Latif, Deputy Attorney General, represented General of the State of California pursuant to Government Code section 1.

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

In the Matter of the Accusation Against:

Thomas Bergstrom, DVM,
Veterinarian License No. VET 23401,

Respondent

Case No. 4602021000378

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Veterinary Medical Board, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on October 24, 2024

It is so ORDERED September 24, 2024

Signature On File
Christina Bradbury, DVM, President
VETERINARY MEDICAL BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

1 ROB BONTA
2 Attorney General of California
3 THOMAS L. RONALDI
4 Supervising Deputy Attorney General
5 MICHAEL YI
6 Deputy Attorney General
7 State Bar No. 217174
8 ELAINE YAN
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15 E-mail: Michael.Yi@doj.ca.gov
16 Attorneys for Complainant

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

In the Matter of the Accusation Against:

JOHN PENA ARAUJO
PO Box 1433
Arcadia, CA 91077-1433

Veterinarian License No. VET 6361

Case No. 4602021000126
ACCUSATION

Respondent.

PARTIES

1. Jessica Sierfman (Complainant) brings this Accusation solely in her capacity as the Executive Officer of the California Veterinary Medical Board, Department of Consumer Affairs, State of California.
2. On July 7, 1977, the California Veterinary Medical Board (Board) issued Veterinarian License Number VET 6361 to John Pena Araujo (Respondent). The License was in full force and effect at all times relevant to the charges brought herein on August 31, 2024, unless renewed.
3. This Accusation is brought before the Board under the authority of the laws. All section references are to the Business and Professions Code unless otherwise indicated.

JURISDICTION

This Accusation is brought before the Board under the authority of the laws. All section references are to the Business and Professions Code unless otherwise indicated.

(JOHN PENA ARAUJO)

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

In the Matter of the Accusation Against:

Anita Yacoub,
Veterinarian License No. VET 16443.

Respondent
Case No. 4602021001512

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Veterinary Medical Board, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on April 21, 2025

It is so ORDERED March 20, 2025

Signature on file
Maria Preciosa S. Solacito, DVM, President
VETERINARY MEDICAL BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA