

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

In the Matter of the Accusation Against:

Jeff A. Blea, DVM,

Veterinarian License No. VET 11928,

Respondent

Case No. 4602021001570

OAH No. 2022031029

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 September 21, 2022.

It is so ORDERED August 22, 2022.

Signature On File

Kathy Bowler, President
VETERINARY MEDICAL BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

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

14 In the Matter of the Accusation Against:

15 **JEFF A. BLEA**
16 485 San Gabriel Court
Sierra Madre, CA 91024

17 Veterinarian License No. VET 11928,
18 Respondent.
19

Case No. 4602021001570

OAH No. 2022031029

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

20
21 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
22 entitled proceedings that the following matters are true:

23 **PARTIES**

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

1 **CULPABILITY**

2 9. Respondent understands and agrees that the charges and allegations in First Amended
3 Accusation number 4602021001570, if proven at a hearing, constitute cause for imposing
4 discipline upon his Veterinarian License.

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

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

11 **CONTINGENCY**

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

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

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

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

3 15. In consideration of the foregoing admissions and stipulations, the parties agree that
4 the Board may, without further notice or formal proceeding, issue and enter the following
5 Disciplinary Order:

6 **DISCIPLINARY ORDER**

7 IT IS HEREBY ORDERED that Veterinarian License Number VET 11928 issued to
8 Respondent Jeff A. Blea is revoked. However, the revocation is stayed and Respondent is placed
9 on probation for three (3) years on the following terms and conditions:

10 1. Obey All Laws.

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

16 2. Quarterly Reports

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

25 3. Interview with the Board

26 Within 30 days off the effective date of the Decision, Respondent shall appear in person for
27 an interview with the Board or its designee to review the terms and conditions of probation.
28 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 of *his* patient records, hospital records, books, logs, and other documents relating to
9 the 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. Respondent
13 is encouraged to contact the Board's probation monitoring program representative at any time
14 Respondent has a question or concern regarding the terms and conditions of Respondent's
15 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 with
17 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

1 petition to revoke probation pending against Respondent.

2 13. License Surrender While on Probation/Suspension

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

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

13 14. Completion of Probation

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

18 15. Cost Recovery

19 Pursuant to Section 125.3 of the California Business and Professions Code, within thirty
20 (30) days of the effective date of this Decision, Respondent shall pay to the Board its enforcement
21 costs including investigation and prosecution, in the amount of \$131,424.00 which may be paid
22 over time in accordance with a Board approved payment plan, within six (6) months before the
23 end of the probation term. Cost recovery shall not be tolled.

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1 16. Inspections

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

4 (A) The location or mobile veterinary practice shall hold a current premises registration
5 issued by the Board, and Respondent shall make the practice or location available for inspections
6 by a Board representative to determine whether the location or veterinary practice meets
7 minimum standards for a veterinary premises. The inspections will be conducted on an
8 announced or unannounced basis and shall be held during normal business hours. The Board
9 reserves the right to conduct these inspections on at least a quarterly basis during probation.
10 Respondent shall pay the Board for the cost of each inspection, which is \$500.

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

16 17. Continuing Education

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

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ACCEPTANCE

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

DATED: _____ **Jeff A. Blea** Digitally signed by Jeff A. Blea
Date: 2022.08.02 13:40:55 -07'00'
JEFF A. BLEA
Respondent

I have read and fully discussed with Respondent Jeff A. Blea the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: August 2, 2022 Signature On File

LISA J. BROWN
GEORGE M. WALLACE
Attorney for Respondent

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ENDORSEMENT

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

DATED: August 3, 2022

Respectfully submitted,

ROB BONTA
Attorney General of California
KIM KASRELIOVICH
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

First Amended Accusation number 4602021001570

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
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State Bar No. 277961
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Attorneys for Complainant

9
10 **BEFORE THE**
11 **VETERINARY MEDICAL BOARD**
12 **DEPARTMENT OF CONSUMER AFFAIRS**
13 **STATE OF CALIFORNIA**

14 In the Matter of the Accusation Against:

Case No. 4602021001570

15 **JEFF A. BLEA**
485 San Gabriel Court
16 Sierra Madre, CA 91024

FIRST AMENDED ACCUSATION

17 Veterinarian License No. VET 11928,
18 Respondent.

19
20
21 **PARTIES**

22 1. Jessica Sieferman (Complainant) brings this First Amended Accusation (Accusation)
23 solely in her official capacity as the Executive Officer of the Veterinary Medical Board (Board),
24 Department of Consumer Affairs.

25 2. On September 16, 1993, the Board issued Veterinarian License Number VET 11928
26 to Jeff A. Blea (Respondent Blea). The Veterinarian License was in full force and effect at all
27 times relevant to the charges brought in this First Amended Accusation and will expire on
28 October 31, 2023, unless renewed.

1 **JURISDICTION**

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

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

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

15 **STATUTORY PROVISIONS**

16 6. Section 4021 defines “controlled substance” to mean “any substance listed in Chapter
17 2 (commencing with Section 11053) of Division 10 of the Health and Safety Code.”

18 7. Section 4022 provides:

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

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

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

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

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

1 9. Section 4169 provides, in relevant part:

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

3

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

7 10. Section 4170 provides, in relevant part:

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

10

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

13 11. Section 4829.5 states:

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

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

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

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

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

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

27 (b) If requested, a veterinarian shall provide drug documentation, if available.

28 (c) A veterinarian may delegate to a registered veterinary technician or veterinary
assistant the task of providing the consultation and drug documentation required
by this section.

(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.

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12. Section 4855 states:

A veterinarian subject to the provisions of this chapter [the Veterinary Medicine Practice Act] 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 assess a fine as provided in Section 4875 for any of the following:

...

(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 11190 states, in relevant part:

....

(c)(1) For each prescription for a Schedule II, Schedule III, or Schedule IV controlled substance that is dispensed by a prescriber pursuant to Section 4170 of the Business and Professions Code, the prescriber shall record and maintain the following information:

1 (A) Full name, address, and the telephone number of the ultimate user or research
2 subject, or contact information as determined by the Secretary of the United States
3 Department of Health and Human Services, and the gender, and date of birth of the
4 patient.

5 (B) The prescriber's category of licensure and license number; federal controlled
6 substance registration number; and the state medical license number of any
7 prescriber using the federal controlled substance registration number of a
8 government-exempt facility.

9 (C) NDC (National Drug Code) number of the controlled substance dispensed.

10 (D) Quantity of the controlled substance dispensed.

11 (E) ICD-9 (diagnosis code), if available.

12 (F) Number of refills ordered.

13 (G) Whether the drug was dispensed as a refill of a prescription or as a first-time
14 request.

15 (H) Date of origin of the prescription.

16 (2) (A) Each prescriber that dispenses controlled substances shall provide the
17 Department of Justice the information required by this subdivision on a weekly
18 basis in a format set by the Department of Justice pursuant to regulation.

19 (B) The reporting requirement in this section shall not apply to the direct
20 administration of a controlled substance to the body of an ultimate user.

21 (d) This section shall become operative on January 1, 2005.

22 (e) The reporting requirement in this section for Schedule IV controlled substances
23 shall not apply to any of the following:

24 (1) The dispensing of a controlled substance in a quantity limited to an amount
25 adequate to treat the ultimate user involved for 48 hours or less.

26 (2) The administration or dispensing of a controlled substance in accordance with
27 any other exclusion identified by the United States Health and Human Service
28 Secretary for the National All Schedules Prescription Electronic Reporting Act of
2005.

(f) Notwithstanding paragraph (2) of subdivision (c), the reporting requirement of
the information required by this section for a Schedule II or Schedule III controlled
substance, in a format set by the Department of Justice pursuant to regulation, shall
be on a monthly basis for all of the following:

(1) The dispensing of a controlled substance in a quantity limited to an amount
adequate to treat the ultimate user involved for 48 hours or less.

(2) The administration or dispensing of a controlled substance in accordance with
any other exclusion identified by the United States Health and Human Service
Secretary for the National All Schedules Prescription Electronic Reporting Act of
2005.

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

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

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

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

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

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

23 (c) A drug shall not be prescribed for a duration inconsistent with the
24 medical condition of the animal(s) or type of drug prescribed. The
25 veterinarian shall not prescribe a drug for a duration longer than one year
26 from the date the veterinarian examined the animal(s) and prescribed the
27 drug.

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

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

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

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

25

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

1

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

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

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

8

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

10 (11) If relevant, a prognosis of the equine patient's condition.

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

13

14 **COST RECOVERY**

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

19 **DRUG CLASSIFICATIONS AND ABBREVIATIONS**

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

23 23. *Acetylsalicylic acid*, see aspirin.

24 24. *Adequan IM*, see polysulfated glycosaminoglycan.

25 25. *Aspirin*, also known as acetylsalicylic acid or ASA, is used to reduce pain, fever,
26 or inflammation. Aspirin is a dangerous drug pursuant to section 4022 in its injectable form.
27 There are no FDA approved aspirin products and dosages for veterinary patients.

28 26. *Bute*, see phenylbutazone.

29 27. *Butorphanol tartrate*, is a narcotic, Schedule IV controlled substance pursuant to
30 Health and Safety Code section 11057, subdivision (c)(3), and a dangerous drug pursuant to

1 section 4022.

2 28. *Calcium Phosphorus Vitamin Powder* is an oral calcium and phosphorus
3 containing nutritional supplement. It is not a dangerous drug under section 4022.

4 29. *CBC* is an abbreviation for Complete Blood Count.

5 30. *Copper gluconate* is a compounded product only, therefore not FDA approved.

6 31. *Core Eq Innovator Vaccine* is a polyvalent equine vaccine used in horses to prevent
7 Rabies, Tetanus, West Nile, Eastern and Western Equine Encephalomyelitis. Rabies vaccine is
8 restricted to sale only to licensed veterinarians in by Health and Safety Code section 121700, and
9 therefore is a dangerous drug pursuant to section 4022.

10 32. *Cyanocobalamin*, commonly known as Vitamin B-12 and used in horses, is a
11 dangerous drug pursuant to section 4022.

12 33. Dantrium Suspension see Dantrolene.

13 34. *Dantrolene suspension*, used in the control of exertional rhabdomyolysis (tying up) in
14 horses. It is not commercially available as a suspension or a paste, but is as an oral capsule and as
15 an injectable and must be prepared by a compounding pharmacist. The compounded preparation
16 is not FDA approved. It is a dangerous drug pursuant to section 4022.

17 35. *Detomidine hydrochloride*, sold under the tradename Dormosedan, is a sedative used
18 in horses. Detomidine hydrochloride is restricted for use by or on the order of a licensed
19 veterinarian and is a dangerous drug pursuant to section 4022. *Detomidine hydrochloride* and
20 *butorphanol tartrate* may be used in combination to sedate equine patients and is commonly
21 abbreviated as Dorm/Torb.

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

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

- 1 38. *Domorsedan*, trade name for detomidine.
- 2 39. *Dorm/Torb*, see Detomidine and Torbugesic.
- 3 40. *Doxycycline paste* is an antibiotic paste made from doxycycline. The paste form
4 must be compounded as it is not commercially available in that form. As a compounded paste it
5 is not FDA approved. It is a dangerous drug pursuant to section 4022
- 6 41. *EIPH* is an abbreviation for exercise induced pulmonary hemorrhage.
- 7 42. *Entrolyte HE* is an oral electrolyte supplement. It is not a dangerous drug pursuant
8 to section 4022.
- 9 43. *Ferric chloride* is a compounded product, therefore not FDA approved.
- 10 44. *Fluid Therapy* is a term used to describe the administration of physiologic liquids to
11 an animal. The fluids may contain electrolytes and other substances mixed into the fluids, such as
12 vitamins. Fluid therapy is a dangerous drug pursuant to section 4022.
- 13 45. *Full Bucket Supplement, E Pro Pellets* is a nutritional supplement. It is not a
14 dangerous drug pursuant to section 4022.
- 15 46. *Fulvicin Paste*, a compounded paste of the drug griseofulvin used for the treatment of
16 fungal diseases. It is a dangerous drug pursuant to section 4022.
- 17 47. *Furosemide*, sold under the brand names of Lasix or Salix, is a diuretic used in horse
18 racing as an anti-bleeding medication to prevent exercise-induced pulmonary hemorrhage in
19 horses running at high speed and has long been considered a performance enhancing drug in the
20 horse racing industry. Furosemide is available by prescription only and is a dangerous drug
21 pursuant to section 4022.
- 22 48. *GastroGard*, a tradename for omeprazole, is used in the treatment and prevention of
23 gastric ulcers in horses. It is a dangerous drug pursuant to section 4022.
- 24 49. *Glycopyrrolate* is a quaternary ammonium salt and synthetic anti-cholinergic drug
25 that exerts peripheral anti-muscarinic effects on the respiratory tract. Glycopyrrolate is a
26 dangerous drug pursuant to section 4022.
- 27 50. *Hemo-Flo Powder* is an oral nutritional supplement that increases nitric oxide
28 levels to support circulation by regulating blood pressure and proper blood flow. It is not a

1 dangerous drug pursuant to section 4022.

2 51. *Hyaluronate sodium*, sold under the brand name Legend and HyVisc, is an
3 intravenous injectable solution used in horses to treat joint dysfunction associated with equine
4 osteoarthritis. Federal law restricts the use of hyaluronate sodium to use by, or on the order of a
5 licensed veterinarian. Hyaluronate sodium is a dangerous drug pursuant to section 4022.

6 52. *HyVisc or HY*, see hyaluronate sodium. It is labeled for intra-articular use only
7 and is a dangerous drug pursuant to section 4022.

8 53. *Influenza/Rhinopneumonitis vaccine* is administered to control the spread of influenza
9 and Rhinopneumonitis, which cause highly contagious respiratory infections in horses who travel
10 frequently.

11 54. *IRAP* is an abbreviation for *Interleukin-1 Receptor Agonist Protein*. It is process
12 of injecting therapeutic proteins stimulated from the horse's own harvested white blood cells to
13 induce anti-inflammatory effects in the joint.

14 55. *Lasix*, see furosemide.

15 56. *Legend*, see hyaluronate sodium. It is a dangerous drug pursuant to section 4022.

16 57. *Medicated Spray Antibacterial/Anti-fungal*. An unknown drug combination. It
17 would be considered a dangerous drug pursuant to section 4022, and to not be approved by
18 the FDA without further identification.

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

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

23 60. *Oxibendazole* is an OTC wormer used orally in paste form for horses. It is not a
24 dangerous drug pursuant to section 4022.

25 61. *Oxytet*, an abbreviation for oxytetracycline, and antibiotic. It a dangerous drug
26 pursuant to section 4022.

27 62. *Phenylbutazone*, commonly known as Bute and sold as Butazolidin, is an NSAID
28 used to treat lameness in horses. Phenylbutazone is a dangerous drug pursuant to section 4022.

- 1 63. *Polyglycan*, see polysulfated glycosaminoglycan.
- 2 64. *Polysulfated glycosaminoglycan*, sold under the brand name Adequan, is used for the
3 intramuscular treatment of non-infectious degenerative and/or traumatic joint dysfunction and
4 associated lameness of the carpal and hock joints in horses. Polysulfated glycosaminoglycan is a
5 dangerous drug pursuant to section 4022.
- 6 65. *Robaxin*, see methocarbamol.
- 7 66. *SAA, Serum Amyloid A*, is a blood test used as a marker of non-specific
8 inflammatory condition of the horse. Normal values 0-20 with most normal horses < 12.
- 9 67. *Sarapin* is a prescription medication designed to reduce joint pain and inflammation
10 in horses. Derived from extracts of the Pitcher Plant. No commercial FDA approved injectable
11 products exist. Sarapin is a dangerous drug pursuant to section 4022.
- 12 68. *Sodium cacodylate* is a compounded product only, therefore not FDA approved.
- 13 69. *Tetracycline* is an antibiotic and a dangerous drug pursuant to section 4022.
- 14 70. *Thiamine*, also known as Vitamin B1, is an essential B vitamin used in horses for
15 carbohydrate metabolism. If given by injection is it a dangerous drug pursuant to section 4022.
- 16 71. *Throat Flush*. Variable formulations exist, all are compounded; usually by the
17 practicing veterinarian. None are FDA approved.
- 18 72. *Trichlormethiazide* is a compounded product only, therefore not FDA approved.
19 Trichlormethiazide is a dangerous drug pursuant to section 4022.
- 20 73. *TPR WNL* is an abbreviation for temperature, pulse, and respiration within normal
21 limits.
- 22 74. *Trichlormethiazide/dexamethasone*, commonly known as Tri Dex and Naquasone, is
23 a diuretic and corticosteroid combination used for mild swellings of the distal limbs in horses. It
24 is not commercially available and is a compounded product only, therefore not FDA approved.
25 Trichlormethiazide/dexamethasone is a dangerous drug pursuant to section 4022
- 26 75. *Thyro-L Thyroxine*, also known as levothyroxine, is sold under the trade name of
27 Thyro-L (levothyroxine sodium powder USP). Thyro-L is not approved by the FDA. The label
28 of Thyro-L shows indications for treatment of specific disease, supplies doses, contraindications,

1 and bears the federal legend, “Federal law restricts this product to use by or on the order of a
2 licensed veterinarian”. In as much it is a misbranded drug under federal [21 USC § 331 and 21
3 USC § 352(w)] and California State law [BPC § 4169]. Other commercially available forms of
4 levothyroxine powder for equine use are marketed as branded or generic products. None of the
5 marketed levothyroxine powder products are FDA approved. Thyro-L, levothyroxine, and
6 branded levothyroxines are dangerous drugs as defined under section 4022.

7 76. *Torb*, see butorphanol.

8 77. *Torbugesic*, also called *Torb* is a trade name for butorphanol. See butorphanol.

9 78. *Vitamin B1*, see thiamine.

10 79. *Vitamin B12*, see cyanocobalamin.

11 80. *Vitamin B Complex*, a mix of B vitamins. It is a dangerous drug pursuant to section
12 4022 if administered by parenteral route.

13 81. *Vitamin C*, also known as ascorbic acid. It is a dangerous drug pursuant to section
14 4022 if administered by parenteral route.

15 **FACTUAL ALLEGATIONS**

16 82. The Board received an anonymous complaint in February 2021 alleging that
17 Respondent Blea and other veterinarians prescribed and administered medications, including
18 Thyroxine, to equine patients without an examination or medical necessity. The Board
19 investigated the complaint and obtained information that Respondent Blea prescribed, dispensed
20 and administered Thyroxine and other medications to racehorses without an examination or
21 medical necessity. The Board also requested and received medical records from Respondent
22 Blea, which revealed other violations of the Veterinary Medicine Practice Act.

23 83. During its investigation, the Board received Veterinarian Confidential Reports from
24 the CHRB documenting the equine patients treated by Respondent Blea from January 2021 to
25 March 2021. Veterinarians are required to submit Veterinarian Confidential Reports for horses
26 treated at any CHRB-regulated location. The reports revealed that Respondent Blea treated
27 approximately 3,225 equine patients over 67 work days (average of 48 horses per day), as
28 follows:

- a. Approximately 1,060 patients over 21 work days in January 2021;
- b. Approximately 843 patients over 19 work days in February 2021; and
- c. Approximately 1,322 patients over 27 work days in March 2021.

84. The Veterinarian Confidential Reports for Respondent Blea revealed that clusters of equine patients were administered identical medications and treatments, at the same time, at the request of their trainers without medical necessity. The following chart provides an example of the medications or treatments that Respondent Blea administered to clusters of equine patients with the same trainers:

Date	Trainer Initials	Number of patients	Medication or Treatment received
1/13/21	M. P.	6	Adequan
1/14/21	R. M.	6	GastroGard (omeprazole)
1/18/21	R. M.	6	GastroGard
1/22/21	R. M.	6	GastroGard
1/23/21	M. P.	5	Adequan
1/23/21	M. P.	11	Aspirin powder
1/25/21	R. M.	24	Adequan
1/26/21	R. M.	6	GastroGard
1/26/21	P. E.	17	Acepromazine pills 25 mg
2/8/21	R. M.	24	Adequan
2/15/21	R. M.	20	Adequan
2/22/21	R. M.	20	Adequan
2/25/21	K. D.	6	Uniprim 2,000 grams
2/25/21	M. P.	5	Acepromazine pills 25 mg
2/25/21	R. M.	4	Otomax
3/1/21	R. M.	28	Adequan
3/4/21	M. P.	9	Aspirin powder

1	3/6/21	R. M.	10	Aspirin powder
2	3/8/21	R. M.	27	Adequan
3	3/15/21	R. M.	29	Adequan
4	3/16/21	R. M.	10	Acepromazine pills 25 mg
5	3/17/21	P. E.	11	Legend (IV Hyaluronic Acid)
6	3/19/21	R. M.	7	GastroGard
7	3/22/21	R. M.	28	Adequan
8	3/23/21	R. M.	7	GastroGard
9	3/25/21	M. P.	5	Acepromazine pills 25 mg
10	3/25/21	M. P.	4	Aspirin powder
11	3/25/21	K. D.	6	Tucoprim powder
12	3/26/21	M. P.	6	Aspirin powder
13	3/29/21	R. M.	21	Adequan

FIRST CAUSE FOR DISCIPLINE

(Negligence)

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

86. Between September 3, 2020, and January 26, 2021, without performing an examination and forming a diagnosis of any condition that required treatment, Respondent Blea prescribed, dispensed, or administered the following medications to equine patient S.C.¹:

- a. Acepromazine;
- b. Lasix;
- c. Aspirin powder; and

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

1 d. Thyroxine L powder.

2 87. Between February 17, 2020, and April 30, 2020, without performing an examination
3 and forming a diagnosis of any condition that required treatment, Respondent Blea prescribed,
4 dispensed, or administered the following medications to equine patient W.M.:

- 5 a. Lasix;
- 6 b. Furosemide;
- 7 c. Phenylbutazone injection and tablets;
- 8 d. Adequan IM injection;
- 9 e. Entrolyte H.E. powder;
- 10 f. Trichlormethiazide/Dexamethasone powder;
- 11 g. Oxibendazole paste;
- 12 h. Vitamin B Complex injection;
- 13 i. Vitamin B 12 injection;
- 14 j. Vitamin C injection;
- 15 k. Robaxin injection;
- 16 l. Glycopyrrolate injection; and
- 17 m. Hemo-Flo Powder.

18 88. Between February 7, 2020, and April 29, 2020, without performing an examination
19 and forming a diagnosis of any condition that required treatment, Respondent Blea prescribed,
20 dispensed, or administered the following medications to equine patient S.G.:

- 21 a. Acepromazine;
- 22 b. Aspirin powder;
- 23 c. Adequan IM injection;
- 24 d. Lasix; and
- 25 e. Furosemide.

26 89. Between February 1, 2020, and April 21, 2020, without performing an examination
27 and forming a diagnosis of any condition that required treatment, Respondent Blea prescribed,
28 dispensed, or administered the following medications to equine patient D.R.:

- 1 a. Medicated spray;
- 2 b. Aspirin powder;
- 3 c. Calcium Phosphorus Vitamin Powder;
- 4 d. Phenylbutazone injection; and
- 5 e. Adequan IM injection.

6 90. Between February 2, 2020, and April 25, 2020, without performing an examination
7 and forming a diagnosis of any condition that required treatment, Respondent Blea prescribed,
8 dispensed, or administered the following medications to equine patient S.Q.:

- 9 a. Lasix;
- 10 b. Aspirin powder;
- 11 c. Furosemide;
- 12 d. Trichlormethiazide/Dexamethasone Powder;
- 13 e. Phenylbutazone injection;
- 14 f. Tetracycline injection;
- 15 g. Oxytetracycline injection;
- 16 h. Calcium Phosphorus Vitamin Powder; and
- 17 i. Adequan IM injection.

18 91. Between February 2, 2020, and April 25, 2020, without performing an examination
19 and forming a diagnosis of any condition that required treatment, Respondent Blea prescribed,
20 dispensed, or administered the following medications to equine patient S.Ch.:

- 21 a. Hyvisc injection;
- 22 b. Aspirin powder;
- 23 c. Trichlormethiazide/Dexamethasone Powder;
- 24 d. IRAP;
- 25 e. Legend injection;
- 26 f. Dormosedan and Torbugesic injection;
- 27 g. Butorphanol injection;
- 28 h. Detomodine injection;

- i. Calcium Phosphorus Vitamin Powder; and
- j. Adequan IM injection.

SECOND CAUSE FOR DISCIPLINE

(Unprofessional Conduct – Dispensing Dangerous Drugs Without Medical Necessity)

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

93. Between September 3, 2020 and January 26, 2021, without performing an appropriate examination and forming a diagnosis of any condition that required treatment, Respondent Blea dispensed the following unnecessary dangerous drugs to equine patient S.C.:

- a. Acepromazine;
- b. Lasix; and
- c. Thyroxine L powder.

94. Between February 17, 2020, and April 30, 2020, without performing an appropriate examination and forming a diagnosis of any condition that required treatment, Respondent Blea dispensed the following unnecessary dangerous drugs to equine patient W.M.:

- a. Lasix;
- b. Furosemide;
- c. Phenylbutazone injection;
- d. Adequan IM injection;
- e. Trichlormethiazide/Dexamethasone powder;
- f. Vitamin B Complex injection;
- g. Vitamin B 12 injection;
- h. Vitamin C injection;
- i. Robaxin injection; and
- j. Glycopyrrolate injection.

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1 95. Between February 7, 2020, and April 29, 2020, without performing an appropriate
2 examination and forming a diagnosis of any condition that required treatment, Respondent Blea
3 dispensed the following unnecessary dangerous drugs to equine patient S.G.:

- 4 a. Acepromazine;
- 5 b. Adequan IM injection;
- 6 c. Lasix; and
- 7 d. Furosemide.

8 96. Between February 1, 2020, and April 21, 2020, without performing an appropriate
9 examination and forming a diagnosis of any condition that required treatment, Respondent Blea
10 dispensed the following unnecessary dangerous drugs to equine patient D.R.:

- 11 a. Medicated spray;
- 12 b. Phenylbutazone injection; and
- 13 c. Adequan IM injection.

14 97. Between February 2, 2020, and April 25, 2020, without performing an appropriate
15 examination and forming a diagnosis of any condition that required treatment, Respondent Blea
16 dispensed the following unnecessary dangerous drugs to equine patient S.Q.:

- 17 a. Lasix;
- 18 b. Furosemide;
- 19 c. Trichlormethiazide/Dexamethasone Powder;
- 20 d. Phenylbutazone injection;
- 21 e. Tetracycline injection;
- 22 f. Oxytetracycline injection; and
- 23 g. Adequan IM injection.

24 98. Between March 6, 2020, and April 25, 2020, without performing an appropriate
25 examination and forming a diagnosis of any condition that required treatment, Respondent Blea
26 dispensed the following unnecessary dangerous drugs to equine patient S.Ch.:

- 27 a. Hyvisc injection;
- 28 b. Trichlormethiazide/Dexamethasone powder;

- c. Legend injection;
- d. Dormosedan and Torbugesic injection;
- e. Butorphanol injection;
- f. Detomidine injection; and
- g. Adequan IM injection.

THIRD CAUSE FOR DISCIPLINE

(Unprofessional Conduct – Failure to Establish Veterinarian-Client-Patient Relationship)

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

100. As set forth in paragraphs 85 through 98 above, incorporated here by reference, Respondent Blea prescribed, dispensed, or administered drugs to equine patients, without establishing a VCPR with the patients. Respondent Blea 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.

101. On or about April 23, 2020, Respondent Blea performed an endoscopic exam of equine patient W.M. Before providing the endoscopic exam, Respondent Blea did not: (1) perform and/or document an examination of the patient; (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. Accordingly, Respondent Blea failed to establish the required VCPR before treating W.M.

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- 1 f. A prognosis of the equine patient's condition as required under CCR, title
2 16, section 2032.3, subsection (a)(11); and
3 g. Strength, dosage, route of administration, quantity, and frequency of use
4 for drugs dispensed, as required under CCR, title 16, section 2032.3,
5 subsection (a)(12).

6 105. Respondent Blea's medical records for equine patient W.M., dated between February
7 8, 2020, and April 30, 2020, failed to include the following information:

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

25 106. Respondent Blea's medical records for equine patient S.G., dated between February
26 7, 2020, and April 29, 2020, failed to include the following information:

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

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- 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 equine patient’s condition as required under CCR, title 16, section 2032.3, subsection (a)(11); and
- g. Strength, dosage, route of administration, quantity, and frequency of use for drugs dispensed, as required under CCR, title 16, section 2032.3, subsection (a)(12).

107. Respondent Blea’s medical records for equine patient D.R., date between February 1, 2020, and April 21, 2020, failed to include the following information:

- a. The age, sex, breed, 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);

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- 1 e. Diagnosis or assessment prior to performing a treatment or procedure as
- 2 required under CCR, title 16, section 2032.3, subsection (a)(10);
- 3 f. A prognosis of the equine patient's condition as required under CCR, title
- 4 16, section 2032.3, subsection (a)(11); and
- 5 g. Strength, dosage, route of administration, quantity, and frequency of use
- 6 for drugs dispensed, as required under CCR, title 16, section 2032.3,
- 7 subsection (a)(12).

8 108. Respondent Blea's medical records for equine patient S.Q., dated between February
9 2, 2020, and April 25, 2020, failed to include the following information:

- 10 a. The age, sex, breed, and color of the equine patient as required under CCR,
- 11 title 16, section 2032.3, subsection (a)(4);
- 12 b. A history or pertinent information as it pertains to the equine patient's
- 13 medical status as required under CCR, title 16, section 2032.3, subsection
- 14 (a)(6);
- 15 c. Data, including that obtained by instrumentation, from the physical
- 16 examination of the equine patient as required under CCR, title 16, section
- 17 2032.3, subsection (a)(7);
- 18 d. Treatment and intended treatment plan, including medication dosages as
- 19 required under CCR, title 16, section 2032.3, subsection (a)(8);
- 20 e. Diagnosis or assessment prior to performing a treatment or procedure as
- 21 required under CCR, title 16, section 2032.3, subsection (a)(10);
- 22 f. A prognosis of the equine patient's condition as required under CCR, title
- 23 16, section 2032.3, subsection (a)(11); and
- 24 g. Strength, dosage, route of administration, quantity, and frequency of use
- 25 for drugs dispensed, as required under CCR, title 16, section 2032.3,
- 26 subsection (a)(12).

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1 **SIXTH CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct – Possession or Use of Prohibited Drugs)**

3 112. Respondent Blea is subject to disciplinary action for unprofessional conduct under
4 section 4883, subdivision (g)(3), for violating CCR, title 4, section 1867, subsection (b).

5 Respondent Blea possessed or used a drug, substance, or medication that has not been approved
6 by the FDA for use in the United States on the premises of a facility under the jurisdiction of the
7 CHRB, as follows:

8 113. On or about November 5, 2020, Respondent Blea used Thyroxine L powder to treat
9 equine patient S.C.;

10 114. On or about November 18, 2020, Respondent Blea used Aspirin powder to treat
11 equine patient S.C.;

12 115. On or about March 4, 2020, Respondent Blea used
13 Trichlormethiazide/Dexamethasone powder to treat equine patient W.M.;

14 116. On or about February 10, 2020, February 24, 2020, March 17, 2020, April 4, 2020,
15 and April 21, 2020, Respondent Blea used Aspirin powder to treat equine patient S.G.;

16 117. On or about February 1, 2020, Respondent Blea used Medicated Spray to treat equine
17 patient D.R.;

18 118. On or about February 10, 2020, February 25, 2020, March 17, 2020, April 4, 2020,
19 and April 21, 2020, Respondent Blea used Aspirin powder to treat equine patient D.R.;

20 119. On or about February 3, 2020, February 8, 2020, March 16, 2020, and March 25,
21 2020, Respondent Blea used Trichlormethiazide/Dexamethasone powder to treat equine patient
22 S.Q.;

23 120. On or about February 10, 2020, March 17, 2020, April 4, 2020, and April 21, 2020,
24 Respondent Blea used Aspirin powder to treat equine patient S.Q.;

25 121. On or about March 6, 2020, and April 17, 2020, Respondent Blea used
26 Trichlormethiazide/ Dexamethasone powder to treat equine patient S.Ch.;

27 122. On or about February 11, 2020, March 17, 2020, March 18, 2020, April 4, 2020, and
28 April 22, 2020, Respondent Blea used Aspirin powder to treat equine patient S.Ch.;

1 123. Between January 2021 and March 2021, Respondent Blea used Dantrolene paste to
2 treat equine patients on at least 21 occasions;

3 124. Between January 2021 and March 2021, Respondent Blea used acetylsalicylic acid to
4 treat equine patients on at least five occasions;

5 125. Between January 2021 and March 2021, Respondent Blea used trichlormethiazide to
6 treat equine patients on at least 11 occasions;

7 126. Between January 2021 and March 2021, Respondent Blea used sodium cacodylate to
8 treat equine patients on at least three occasions;

9 127. Between January 2021 and March 2021, Respondent Blea used ferric chloride to treat
10 equine patients on at least three occasions;

11 128. Between January 2021 and March 2021, Respondent Blea used copper gluconate to
12 treat equine patients on at least three occasions;

13 129. Between January 2021 and March 2021, Respondent Blea used
14 trichlormethiazide/dexamethasone, also known as Naquasone, to treat equine patients on at least
15 59 occasions;

16 130. Between January 2021 and March 2021, Respondent Blea used DMSO to treat
17 equine patients on at least 24 occasions;

18 131. Between January 2021 and March 2021, Respondent Blea used Throat Flush to treat
19 equine patients on at least 27 occasions;

20 132. Between January 2021 and March 2021, Respondent Blea used doxycycline paste to
21 treat equine patients on at least four occasions;

22 133. Between January 2021 and March 2021, Respondent Blea used aspirin powder to
23 treat equine patients on at least 76 occasions;

24 134. Between January 2021 and March 2021, Respondent Blea used Fulvicin paste to treat
25 equine patients on at least eight occasions; and

26 135. Between January 2021 and March 2021, Respondent Blea used Sarapin to treat an
27 equine patient on at least one occasion.

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1 **SEVENTH CAUSE FOR DISCIPLINE**

2 **(Violation of Practice Act – Failure to Provide Required Drug Consultation)**

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

7 137. On or about March 4, 2020, Respondent Blea prescribed, dispensed, or furnished
8 Trichlormethiazide/Dexamethasone powder for equine patient W.M. without offering to provide,
9 or noting the required drug consultation in the medical record;

10 138. On or about April 2, 2020, Respondent Blea prescribed, dispensed, or furnished
11 Phenylbutazone for equine patient W.M. without offering to provide, or noting the required drug
12 consultation in the medical record;

13 139. On or about February 7, 2020, Respondent Blea prescribed, dispensed, or furnished
14 Acepromazine for equine patient S.G. without offering to provide, or noting the required drug
15 consultation in the medical record;

16 140. On or about February 1, 2020, Respondent Blea prescribed, dispensed, or furnished
17 Medicated Spray for equine patient D.R. without offering to provide, or noting the required drug
18 consultation in the medical record;

19 141. On or about February 3, 2020, February 8, 2020, March 16, 2020, and March 25,
20 2020, Respondent Blea prescribed, dispensed, or furnished Trichlormethiazide/Dexamethasone
21 powder for equine patient S.Q. without offering to provide, or noting the required drug
22 consultation in the medical record; and

23 142. On or about March 6, 2020, and April 17, 2020, Respondent Blea prescribed,
24 dispensed, or furnished Trichlormethiazide/Dexamethasone powder for equine patient S.Ch.
25 without offering to provide, or noting the required drug consultation in the medical record.

26 **DISCIPLINARY CONSIDERATION**

27 143. To determine the degree of discipline, if any, to be imposed on Respondent Blea,
28 Complainant alleges that between January 2021 and March 2021, Respondent Blea treated

1 approximately 3,225 equine patients over 67 work days (average of 48 horses per day), as
2 follows:

- 3 a. Approximately 1,060 patients over 21 work days in January 2021;
- 4 b. Approximately 843 patients over 19 work days in February 2021; and
- 5 c. Approximately 1,322 patients over 27 work days in March 2021.

6 144. Complainant further alleges that between January 2021 and March 2021, Respondent
7 Blea administered identical medications and treatments to clusters of equine patients, at the same
8 time, at the request of their trainers without medical necessity. Paragraphs 83 to 84 are re-alleged
9 as if fully set forth herein.

10 **PRAYER**

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

- 13 1. Revoking or suspending Veterinarian License Number VET 11928, issued to Jeff A.
14 Blea;
- 15 2. Ordering Jeff A. Blea to pay the Board the reasonable costs of the investigation and
16 enforcement of this case, pursuant to Business and Professions Code section 125.3;
- 17 3. Assessing a fine against Jeff A. Blea not in excess of \$5,000 for any of the causes
18 specified in Business and Professions Code section 4883; and
- 19 4. Taking such other and further action as deemed necessary and proper.

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22 DATED: February 11, 2022

Signature On File

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

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