

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

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

**Cesar Carlos Perez Jr.**

**Unlicensed**

**Respondent**

**Citation No. 4602019000060**

**CITATION**

Complainant alleges:

**PARTIES**

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

**STATUTORY PROVISIONS**

3. Business and Professions Code (BPC) sections 125.9, 148, and 4875.2 and California Code of Regulations (CCR), Title 16, section 2043 authorize the Executive Officer of the Board to issue citations containing orders of abatement and/or administrative fines against a licensee of the Board, or to an unlicensed person, who has committed any acts or omissions in violation of the Veterinary Medicine Practice Act (Act).
4. BPC section 4825 provides that it is unlawful for any person to practice veterinary medicine or any branch thereof in this State unless at the time of so doing, such person holds a valid, unexpired, and unrevoked license as provided by this chapter.
5. BPC section 4826 states, in pertinent part, that a person practices veterinary medicine, surgery, and dentistry, and the various branches thereof, when the person does any one of the following:

- (a) Represents oneself as engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry in any of its branches.
- (b) Diagnoses or prescribes a drug, medicine, appliance, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals.
- (c) Administers a drug, medicine, appliance, application, or treatment of whatever nature for the prevention, cure, or relief of a wound, fracture, bodily injury, or disease of animals, except where the medicine, appliance, application, or treatment is administered by a registered veterinary technician or a veterinary assistant at the direction of and under the direct supervision of a licensed veterinarian subject to Article 2.5 (commencing with Section 4836) or where the drug, including, but not limited to, a drug that is a controlled substance, is administered by a registered veterinary technician or a veterinary assistant pursuant to Section 4836.1. However, no person, other than a licensed veterinarian, may induce anesthesia unless authorized by regulation of the board.
- (d) Performs a surgical or dental operation upon an animal.

[...]

7. BPC section 4853 states, in pertinent part:

- (a) All veterinary premises shall be registered with the board. The certificate of registration shall be on a form prescribed in accordance with Section 164.
- (b) "Premises" for the purpose of this chapter shall mean the location of operation where veterinary medicine, veterinary dentistry, veterinary surgery, and the various branches thereof is being practiced and shall include a building, kennel, mobile unit, or vehicle. Mobile units and vehicles shall be exempted from independent registration with the board if they are operated from a building or facility that is the licensee manager's principal place of business and the building is registered with the board, and the registration identifies and declares the use of the mobile unit or vehicle.

[...]

### **FACTUAL ALLEGATIONS**

- 8. On June 24, 2021, the Board issued a citation to Respondent for the unlicensed practice of veterinary medicine.
- 9. On December 7, 2023, Board investigators presented at American Pet Resort and Spa with a canine patient for a dental procedure. Respondent represented himself to the investigators as a veterinary dentist.

10. On June 5, 2024, the Los Angeles County Superior Court charged the Respondent with a misdemeanor for practicing veterinary medicine without a license. As a result of the charge, the Respondent was placed in a diversion program.

### **CAUSE FOR CITATION**

11. On December 7, 2023, Respondent engaged in the practice of veterinary medicine by representing himself as a veterinary dentist without possessing a valid veterinarian license. Such conduct constitutes a violation of BPC sections 4825 and 4826, subdivision (a).

12. On December 7, 2023, Respondent engaged in the practice of veterinary medicine by performing dental scaling and extractions on animal patients without possessing a valid veterinarian license. Such conduct constitutes a violation of BPC sections 4825 and 4826, subdivisions (c) and (d).

13. On December 7, 2023, Respondent engaged in the practice of veterinary medicine by diagnosing dental disease in animal patients without possessing a valid veterinarian license. Such conduct constitutes a violation of BPC sections 4825 and 4826, subdivision (b).

14. On December 7, 2023, Respondent performed unlicensed veterinary services for clients at American Pet Resort & Spa in Glendale, CA, a location not registered with the Board. Such conduct constitutes a violation of BPC section 4853.

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

15. A violation exists pursuant to BPC sections 4825 and 4826, subdivision (a). Based upon a violation as set forth in Paragraph 11, a cause of action thereby exists.

16. A violation exists pursuant to BPC sections 4825 and 4826, subdivisions (c) and (d). Based upon a violation as set forth in Paragraph 12, a cause of action thereby exists.

17. A violation exists pursuant to BPC sections 4825 and 4826, subdivision (b). Based upon a violation as set forth in Paragraph 13, a cause of action thereby exists.

18. A violation exists pursuant to BPC section 4853. Based upon a violation as set forth in Paragraph 14, a cause of action thereby exists.

**PENALTY**

19. In compliance with BPC sections 125.9 and 4875.2, and CCR, Title 16, section 2043, subdivision (e), it is determined that:

Respondent be cited for a Class “C” violation in the amount of \$5,000 for the Cause for Citation, based upon a determination that the above-described facts in Paragraph 11 constitutes a violation of BPC sections 4825 and 4826, subdivision (a).

Respondent be cited for a Class “C” violation in the amount of \$5,000 for the Cause for Citation, based upon a determination that the above-described facts in Paragraph 12 constitutes a violation of BPC sections 4825 and 4826, subdivisions (c) and (d).

Respondent be cited for a Class “C” violation in the amount of \$5,000 for the Cause for Citation, based upon a determination that the above-described facts in Paragraph 13 constitutes a violation of BPC sections 4825 and 4826, subdivision (b).

Respondent be cited for a Class “C” violation in the amount of \$5,000 for the Cause for Citation, based upon a determination that the above-described facts in Paragraph 14 constitutes a violation of BPC 4853.

20. In compliance with BPC sections 125.9 and 4875.2, and CCR, Title 16, section 2043, subsection (c), the total penalty for the above violations is \$20,000. However, pursuant to BPC section 125.9, subdivision (b)(3), in no event shall the administrative fee assessed by the Board exceed \$5,000. Therefore, the total penalty due is \$5,000.

**ORDER OF ABATEMENT**

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

In addition, pursuant to BPC section 149, subdivision (a)(2), the Board orders Respondent to notify the telephone company furnishing the services to Respondent to disconnect the telephone service furnished to any telephone number contained in the unlawful advertising.

MARCH 20, 2025  
DATE

SIGNATURE ON FILE  
JESSICA SIEFERMAN  
Executive Officer  
California Veterinary Medical Board  
Department of Consumer Affairs  
State of California