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8
9 **BEFORE THE**
CALIFORNIA VETERINARY MEDICAL BOARD
10 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

11 In the Matter of the Statement of Issues
12 Against:

13 **KRISTEN JARDINE KRUER**

14 **Veterinarian License Applicant.**

15 Respondent.

Case No. 4602025000760

STATEMENT OF ISSUES

16
17 **PARTIES**

18 1. Jessica Sieferman (Complainant) brings this Statement of Issues solely in her official
19 capacity as the Executive Officer of the California Veterinary Medical Board, Department of
20 Consumer Affairs.

21 2. On or about October 27, 2024, the California Veterinary Medical Board, Department
22 of Consumer Affairs, received an application for a Veterinarian License from Kirsten Jardine
23 Kruer (Respondent). On or about October 27, 2024, Kirsten Jardine Kruer certified under penalty
24 of perjury to the truthfulness of all statements, answers, and representations in the application.
25 The Board denied the application on April 1, 2025.

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1 **JURISDICTION**

2 3. This Statement of Issues is brought before the California Veterinary Medical Board
3 (Board), Department of Consumer Affairs, under the authority of the following laws. All section
4 references are to the Business and Professions Code (Code) unless otherwise indicated.

5 4. Section 480 of the Code states:

6 (a) Notwithstanding any other provision of this code, a board may deny a
7 license regulated by this code on the grounds that the applicant has been convicted of
8 a crime or has been subject to formal discipline only if either of the following
9 conditions are met:

10 ...

11 (2) The applicant has been subjected to formal discipline by a licensing board in
12 or outside California within the preceding seven years from the date of application
13 based on professional misconduct that would have been cause for discipline before
14 the board for which the present application is made and that is substantially related to
15 the qualifications, functions, or duties of the business or profession for which the
16 present application is made. However, prior disciplinary action by a licensing board
17 within the preceding seven years shall not be the basis for denial of a license if the
18 basis for that disciplinary action was a conviction that has been dismissed pursuant to
19 Section 1203.4, 1203.4a, 1203.41, 1203.42, or 1203.425 of the Penal Code or a
20 comparable dismissal or expungement. Formal discipline that occurred earlier than
21 seven years preceding the date of application may be grounds for denial of a license
22 only if the formal discipline was for conduct that, if committed in this state by a
23 physician and surgeon licensed pursuant to Chapter 5 (commencing with Section
24 2000) of Division 2, would have constituted an act of sexual abuse, misconduct, or
25 relations with a patient pursuant to Section 726 or sexual exploitation as defined in
26 subdivision (a) of Section 729.

18 **STATUTORY PROVISIONS**

19 5. Section 4883 of the Code states:

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

22 ...

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

24 ...

25 (2) (A) The use of or prescribing for or administering to himself or herself, any
26 controlled substance.

27 (B) The use of any of the dangerous drugs specified in Section 4022, or of
28 alcoholic beverages to the extent, or in any manner as to be dangerous or injurious to
a person licensed or registered under this chapter, or to any other person or to the
public, or to the extent that the use impairs the ability of the person so licensed or
registered to conduct with safety the practice authorized by the license or registration.

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

...

(l) The revocation, suspension, or other discipline by another state or territory of a license, certificate, or registration to practice veterinary medicine or as a veterinary technician in that state or territory.

DEFINITIONS

6. *Midazolam* is classified as a short-acting benzodiazepine central nervous system depressant that is indicated as an anesthetic induction agent (procedural sedation). It is a Schedule IV controlled substance as defined by Health and Safety Code Section 11057, subdivision (d)(21), and is a dangerous drug within the meaning of Code Section 4022.

7. *Buprenorphine*, is a Schedule V controlled substance as defined by Health and Safety Code section 11058, subdivision (d), and is a dangerous drug within the meaning of Code section 4022.

FIRST CAUSE FOR DENIAL OF APPLICATION

(Dangerous Use of Controlled Substance)

8. Respondent's application is subject to denial under Code section 4833, subdivision (g)(2)(B), in that Respondent used a controlled substance to the extent, or in any manner as to be dangerous or injurious to herself or the public, or to the extent that the use impaired Respondent's ability to conduct with safety the practice veterinary medicine as follows:

9. On or about March 20, 2020, in the case titled *State of Delaware v. Kristen J Krueer*, New Castle County Court of Common Pleas, case number 2002002909, charges were filed against Respondent for acquiring or attempting to acquire or obtain possession of a controlled substance by theft. On or about August 6, 2020, Respondent was granted 12 months of probation before judgment on her guilty to plea to one count of possession of drug paraphernalia. Respondent was ordered to submit to random drug screens, continue current drug testing, to follow any rulings by the Delaware Board of Professional Regulation, and to not work as a veterinarian unless allowed by the Delaware Board of Professional Regulation. On or about

1 February 16, 2021, Respondent was discharged from probation early and without judgment of
2 guilt. The charge against Respondent was dismissed. The underlying circumstances were as
3 follows:

4 10. On or about December 20, 2019, an officer with the Delaware State Police was
5 dispatched to PetSmart at Churchmans Road in Newark, Delaware, where the Respondent worked
6 as a Veterinarian in the hospital. During the officer's investigation, it was revealed that after
7 performing surgeries, Respondent told staff that she was going to use the bathroom. After
8 noticing that Respondent was in the bathroom for approximately 20 minutes, a staff member went
9 into the bathroom and observed a vial on the floor and Respondent moaning and nodding out.
10 Respondent admitted to taking drugs from the hospital. Respondent admitted to the officer to self-
11 administering Midazolam. Respondent admitted to the officer that she had a substance abuse
12 problem.

13 **SECOND CAUSE FOR DENIAL OF APPLICATION**

14 **(Self-Administered Dangerous Drug)**

15 11. Respondent's application is subject to denial under Code section 4833, subdivision
16 (g)(2)(A), in that Respondent self-administered Midazolam as more fully described above in
17 paragraph 10.

18 **THIRD CAUSE FOR DENIAL OF APPLICATION**

19 **(Out-of-State Discipline)**

20 12. Respondent's application is subject to denial under Code sections 480, subdivision
21 (a)(2) and 4881, subdivision (I), in that Respondent was disciplined by the Delaware Board of
22 Veterinary Medicine (Delaware Board) as follows:

23 13. On or about October 11, 2021, the Delaware Secretary of State adopted a Consent
24 Agreement, dated August 10, 2021, between Respondent and the Delaware Board. The Order
25 placed Respondent on probation for two years, contingent upon Respondent's enrollment in the
26 Delaware Professional's Health Monitoring Program (DPHMP); required any practice of
27 veterinary medicine to be under the supervision of another veterinarian; and completion of
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continuing education in areas of substance abuse and ethics. The conduct that resulted in discipline by the Delaware Secretary of State is more fully set forth above in paragraphs 9-10.

14. Additionally, during its investigation, the Delaware Board discovered that Respondent diverted multiple controlled substances including buprenorphine she had prescribed to her cat.

FOURTH CAUSE FOR DENIAL OF APPLICATION

(Acts of Deception)

15. Respondent's application is subject to denial under Code section 4833, subdivision (i), in that Respondent committed acts of deception when she diverted multiple controlled substances as more fully set forth above in paragraph 14.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the California Veterinary Medical Board issue a decision:

1. Denying the application of Kirsten Jardine Kruer for a Veterinarian License; and
2. Taking such other and further action as deemed necessary and proper.

DATED: April 21, 2025

Signature on File

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

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