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

In the Matter of the Citation Against:

Jean Dodds

Respondent

Citation No. 4602024000246

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 reveal that Jean Dodds ("Respondent") has not been issued a veterinarian license.

STATUTORY PROVISIONS

- 3. Business and Professions Code (BPC) sections 125.9, and 4875.2 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 an unlicensed person, who has committed any acts or omissions in violation of the California Veterinary Medicine Practice Act (Act).
- 4. BPC section 4825, states:

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 in this chapter.

5. BPC section 4826, states, in pertinent part:

[. . .]

(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.

[. . .]

FACTUAL ALLEGATIONS

- 6. On or about October 11, 2021, the Board issued a citation to Respondent for interpreting lab results, diagnosing certain food intolerances, and providing a treatment plan without possessing a valid veterinarian license.
- 7. On or about February 16, 2024, Respondent interpreted lab results, diagnosed certain food intolerances, and provided a treatment plan to animal patient "Agnes" based on a saliva sample without possessing a valid veterinarian license.

CAUSE FOR CITATION

8. On or about February 16, 2024, Respondent interpreted lab results, diagnosed certain food intolerances, and provided a treatment plan for Agnes based on a saliva sample without possessing a valid veterinarian license. Such unlicensed conduct constitutes a violation of BPC section 4825, as defined in BPC section 4826, subdivision (b).

DETERMINATION OF ISSUES CAUSE OF ACTION

9. Violations exist pursuant to BPC section 4825, as defined in BPC section 4826, subdivision (b), as set forth in Paragraph 8. A cause of action thereby exists.

PENALTY

10. In compliance with BPC sections 125.9 and 4875.2 and CCR, Title 16, section 2043, 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 set forth in Paragraph 8 constitutes a violation BPC section 4825, as defined in BPC section 4826, subdivision (b).

In compliance with BPC sections 125.9 and 4875.2, and CCR, Title 16, section 2043, subsections (c), the total penalty for the above violations is \$5,000.00.

ORDER OF ABATEMENT

The Board hereby orders Respondent to cease and desist from violating BPC sections 4825 and 4826, subdivision (b).

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.

4/28/2025	Signature on File
DATE	JESSICA SIEFERMAN
	Executive Officer
	California Veterinary Medical Board
	Department of Consumer Affairs
	State of California