

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

In the Matter of the Citation Against:

Tiffany Laniece Taylor-Thompson,

Unlicensed

Respondent

Citation No. 4602024001221

CITATION

Complainant alleges:

PARTIES

1. Jessica Sieferman (“Complainant”) brings this Citation solely in her official capacity as the Executive Officer of the Veterinary Medical Board (“Board”), Department of Consumer Affairs, State of California.
2. The Board’s records fail to reveal that Tiffany Laniece Taylor-Thompson (“Respondent”) has been issued a registered veterinary technician 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, in pertinent part:

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 provides, in pertinent part:

A person practices veterinary medicine, surgery, and dentistry, and the various branches thereof, when he or she does any one of the following:

[...]

(g) Uses any words, letters, or titles in such connection or under such circumstances as to induce the belief that the person using them is engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry. This use shall be prima facie evidence of the intention to represent oneself as engaged in the practice of veterinary medicine, veterinary surgery, or veterinary dentistry.

[...]

6. BPC section 4839.5 provides, in pertinent part:

No person shall use the title “registered veterinary technician” or “veterinary technician,” or any other words, letters, or symbols, including, but not limited to, the abbreviation “R.V.T.,” with the intent to represent that the person is authorized to act as a registered veterinary technician, unless that person meets the requirements of Section 4839.

CAUSE FOR CITATION

7. Beginning on or about April 25, 2022, through April 2, 2024, Respondent altered and utilized a Registered Veterinary Technician (RVT) registration to fraudulently represent herself as an RVT to obtain an administrative position at Carrington College San Leandro. Such unlicensed conduct constitutes a violation of BPC section 4825, as defined by BPC section 4826, subdivision (g).
8. Beginning on or about March 4, 2024, through April 2, 2024, Respondent represented herself on LinkedIn as an RVT without possession of a valid RVT registration issued by the Board. Such unlicensed conduct constitutes a violation of BPC section 4825, as defined in BPC section 4826, subdivision (g) and 4839.5.

DETERMINATION OF ISSUES **CAUSE OF ACTION**

9. Violations exist pursuant to BPC section 4825, as defined in BPC 4826, subdivision (g), as set forth in Paragraph 7. A cause of action thereby exists.
10. Violations exist pursuant to BPC section 4825, as defined in BPC section 4826,

subdivision (g) and 4839.5, as set forth in Paragraph 8. A cause of action thereby exists.

PENALTY

11. In compliance with BPC sections 148 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 above in Paragraph 7 constitute a violation of BPC section 4825, as defined in BPC section 4826, subdivision (g).

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 above in Paragraph 8 constitute a violation of BPC section 4825, as defined in BPC section 4826, subdivision (g) and 4839.5.

12. In compliance with BPC sections 125.9 and 4875.2, and CCR, Title 16, section 2043, subsection (e), the total penalty for the above violations is \$10,000.00. However, pursuant to BPC section 125.9, subdivision (b)(3), in no event shall the administrative fine assessed by the Board exceed \$5,000.00. Therefore, total fine amount due to the Board is \$5,000.00.

ORDER OF ABATEMENT

The Board hereby orders Respondent to cease and desist from violating BPC sections 4825, 4826, subdivision (g), and 4839.5.

May 31, 2024

DATE

SIGNATURE ON FILE

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