

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

**IN THE MATTER OF THE PETITION FOR EARLY TERMINATION OF PROBATION RE
MICHAEL JAY STERNS**

**Agency Case No. 4602017001022
Office of Administrative Hearings Case No. TBD**

TAB #	DOCUMENT	I.D.	ADMIT
1	<ul style="list-style-type: none">• Notice of Hearing (Redacted)		
2	<ul style="list-style-type: none">• Certification of License History (Redacted).		
3	<ul style="list-style-type: none">• Veterinary Medical Board Case No. 4602017001022: Decision and Order re: Stipulated Settlement and Disciplinary Order (Effective July 21, 2021); Decision and Order re: Stipulated Settlement and Disciplinary Order, and; Accusation.		
4	<ul style="list-style-type: none">• Petition for Early Termination of Probation (Redacted).		
5	<ul style="list-style-type: none">• Petitioner's Statement.		
6	<ul style="list-style-type: none">• Petitioner's CV/Resume (Redacted).		
7	<ul style="list-style-type: none">• Petitioner's Continuing Education.		
8	<ul style="list-style-type: none">• Petitioner's Letters of Reference.		
9	<ul style="list-style-type: none">• Compliance Report		

EXHIBIT 1



VIA ELECTRONIC MAIL, CERTIFIED MAIL AND REGULAR MAIL

March 8, 2024

Michael J. Sterns
280 Shelford Avenue
San Carlos, CA 94070
[REDACTED]

Michael A. Firestone
1700 S. El Camino Real, Suite 408
San Mateo, CA 94402
[REDACTED]

RE: HEARING NOTICE
OAH Case No. TBD
Petition for Reinstatement or Modification of Penalty – Michael J. Sterns

Dear Dr. Michael J. Sterns:

You are hereby notified that a hearing will be held before the Veterinary Medical Board,
Department of Consumer Affairs:

Date: Thursday, April 18, 2024
Time: 1:00 PM Pacific Time
Location: Department of Consumer Affairs
Hearing Room
1625 N. Market Blvd
Sacramento, CA 95834

Alternatively, in lieu of attending in-person at this hearing in the Sacramento office, you
may attend and participate virtually via Webex:

Event address:
<https://dca-meetings.webex.com/dca-meetings/j.php?MTID=m4fd61a2068d4bd7bfefda0ae55cf2e0a>

Event number: 2493 224 0280
Event password: VMB418

Phone audio conference: (415) 655-0001
Access code: 2493 224 0280
Passcode: 862418

The hearing will be conducted before the Veterinary Medical Board, Department of Consumer Affairs and an administrative law judge of the Office of Administrative Hearings, who will preside over the Petition for Reinstatement or Modification of Penalty.

You may be present at the hearing. You have the right to be represented by an attorney at your own expense. You are not entitled to the appointment of an attorney to represent you at public expense. You are entitled to represent yourself without legal counsel. You may present any relevant evidence and will be given full opportunity to cross-examine all witnesses testifying against you. You are entitled to the issuance of subpoenas to compel the attendance of witnesses and the production of books, documents, or other things by applying to:

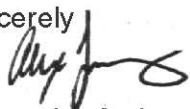
**Office of Administrative Hearings
Attn: General Jurisdiction
2349 Gateway Oaks, Suite 200
Sacramento CA 95833**

INTREPRETER: Pursuant to section 11435.20 of the Government Code, the hearing shall be conducted in English language. If a party or party's witness does not proficiently speak or understand the English language and before commencement of the hearing requests language assistance, an agency subject to the language assistance requirement in section 11435.15 of the Government Code shall provide a certified interpreter or an interpreter approved by the administrative law judge conducting the proceedings. The cost of providing the interpreter shall be paid by the agency having jurisdiction over the matter if the administrative law judge or hearing officer so directs, otherwise by the party for whom the interpreter is provided. If you or a witness requires the assistance of an interpreter, ample advance notice of this fact should be given to the Office of Administrative Hearings so that appropriate arrangements can be made.

CONTINUANCES: Under section 11524 of the Government Code, the agency may grant a continuance, but when an administrative law judge of the Office of Administrative Hearings has been assigned to the hearing, no continuance may be granted except by him or her or by the presiding judge for good cause. When seeking a continuance, a party shall apply for the continuance within 10 working days following the time the party discovered or reasonably should have discovered the event or occurrence which establishes good cause for the continuance. A continuance may be granted for good cause after the 10 working days have lapsed only if the party seeking the continuance is not responsible for and has made a good faith effort to prevent the condition or even establishing the good cause.

Please visit the Board's website at www.vmb.ca.gov to view a copy of the agenda or you may contact me at (916) 905-5434 or via email at Alexander.Juarez@dca.ca.gov.

Sincerely



Alexander A. Juarez
Probation Monitor
Veterinary Medical Board

cc: Summer Haro, Deputy Attorney General
Michael A. Firestone, Respondent Counsel

EXHIBIT 2



CERTIFICATION OF LICENSE HISTORY

This is to certify that I, Matt McKinney, Deputy Executive Officer of the Veterinary Medical Board (Board), Department of Consumer Affairs, State of California, share the responsibility of maintaining control and custody of the official records of the Board. I made or caused to be made a diligent search of the files and records concerning the license history of Dr. Michael J. Sterns. I have determined that the official records prepared by Board employees, acting within the scope of their duties, show the dates and time periods listed herein for the issuance, expiration, periods of invalidity, and renewals of the license, as well as citations issued and periods of formal Board discipline:

VET No. 8662:

Michael J. Sterns
280 Shelford Ave.
San Carlos, CA 94070-1850

First Issued: July 25, 1984
Expiration: August 31, 2024
Status: Current
Secondary Status: Probation

HSP No. 4645:

Alta View Animal Hospital
690 Showers Dr.
Mountain View, CA 94040-1434

First Issued: April 27, 1993
Expiration: May 31, 2021
Status: Revoked
Secondary Status: N/A

HSP No. 38355:

Alta View Animal Hospital
690 Showers Dr.
Mountain View, CA 94040-1434

First Issued: July 09, 2020
Expiration: July 31, 2024
Status: Current
Secondary Status: N/A

HSP No. 38157:

4paws Mobile Veterinary Services
280 Shelford Avenue
San Carlos, CA 94070

First Issued: February 18, 2020

CERTIFICATION OF LICENSE HISTORY

Michael J. Sterns, DVM

Page 2

Expiration: February 28, 2025

Status: Current

Secondary Status: N/A

Discipline:

On April 16, 2021, Second Amended Accusation 4602017001022, was filed against Michael J. Sterns. On June 21, 2021, a Stipulated Settlement and Disciplinary Order for case 4602017001022 was adopted by the Board. On July 21, 2021, the Order became effective placing Michael J. Sterns on probation for five years with terms and conditions.

Dated at Sacramento, California, this 12th day of February 2024



Matt McKinney, Deputy Executive Officer

EXHIBIT 3

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

In the Matter of the Accusation Against:

Michael J. Sterns, DVM,

Veterinarian License No. VET 8662

and

Alta View Animal Hospital

Michael J. Sterns DVM, Managing Licensee,

Premises Registration No. HSP 4645

and

Alta View Animal Hospital

Michael J. Sterns DVM, Managing Licensee,

Premises Registration No. HSP 38355

And

4Paws Mobile Veterinary Services

Michael J. Sterns DVM, Managing Licensee,

Premises Registration No. HSP 38157

Respondents

Case No. 4602017001022

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Veterinary Medical Board, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on July 21, 2021.

It is so ORDERED June 21, 2021.

Signature On File

FOR THE VETERINARY MEDICAL BOARD
DEPARTMENT OF CONSUMER AFFAIRS

MATTHEW RODRIQUEZ
Acting Attorney General of California
JOSHUA A. ROOM
Supervising Deputy Attorney General
NEVA L. TASSAN
Deputy Attorney General
State Bar No. 252612
455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004
Telephone: (415) 510-4455
Facsimile: (415) 703-5480
E-mail: Neva.Tassan@doj.ca.gov
Attorneys for Complainant

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

In the Matter of the Accusation Against:
MICHAEL J. STERNS
690 Showers Drive
Mountain View, CA 94040

Veterinarian License No. VET 8662
Premises Registration No. HSP 4645
Premises Registration No. HSP 38355
Premises Registration No. HSP 38157

Respondents.

Case No. 4602017001022

OAH No. 2020110460

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

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

PARTIES

1. Jessica Sieferman (Complainant) is the Executive Officer of the Veterinary Medical Board (Board). She brought this action solely in her official capacity and is represented in this matter by Matthew Rodriquez, Acting Attorney General of the State of California, by Neva L. Tassan, Deputy Attorney General.

2. Michael J. Sterns (Respondent) is represented in this proceeding by attorney Michael A. Firestone, whose address is: 1700 South El Camino Real, Suite 408, San Mateo, CA 94402.

1 3. On or about July 25, 1984, the Board issued Veterinarian License No. VET 8662 to
2 Respondent. The Veterinarian License will expire on August 31, 2022, unless renewed.

3 4. On or about April 27, 1993, the Board issued Premises Registration No. HSP 4645 to
4 Alta View Animal Hospital. On or about February 14, 2018, Respondent associated as the
5 Managing Licensee of Alta View Animal Hospital. The Premises Registration was cancelled on
6 June 22, 2020, and revoked on July 13, 2020.

7 5. On or about July 9, 2020, the Board issued Premises Registration No. HSP 38355 for
8 Alta View Animal Hospital to Respondent. The Premises Registration will expire on July 31,
9 2021, unless renewed.

10 4. On or about February 18, 2020, the Board issued Premises Registration No. HSP
11 38157 to Respondent for 4Paws Mobile Veterinary Services. The Premises Registration will
12 expire on February 28, 2022, unless renewed.

13 **JURISDICTION**

14 5. Second Amended Accusation No. 4602017001022 was filed before the Board, and is
15 currently pending against Respondent. The Second Amended Accusation and all other statutorily
16 required documents were properly served on Respondent on April 16, 2021. Respondent timely
17 filed his Notice of Defense contesting the Second Amended Accusation.

18 6. A copy of Second Amended Accusation No. 4602017001022 is attached as Exhibit A
19 and incorporated herein by reference.

20 **ADVISEMENT AND WAIVERS**

21 7. Respondent has carefully read, fully discussed with counsel, and understands the
22 charges and allegations in Second Amended Accusation No. 4602017001022. Respondent has
23 also carefully read, fully discussed with counsel, and understands the effects of this Stipulated
24 Settlement and Disciplinary Order.

25 8. Respondent is fully aware of his legal rights in this matter, including the right to a
26 hearing on the charges and allegations in the Second Amended Accusation; the right to confront
27 and cross-examine the witnesses against him; the right to present evidence and to testify on his
28 own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the

1 production of documents; the right to reconsideration and court review of an adverse decision;
2 and all other rights accorded by the California Administrative Procedure Act and other applicable
3 laws.

4 9. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
5 every right set forth above.

6 **CULPABILITY**

7 10. Respondent admits the truth of each and every charge and allegation in Second
8 Amended Accusation No. 4602017001022, except that Respondent does not admit responsibility
9 to the following Causes for Discipline: Second, Sixth, Seventh, Thirteenth, Eighteenth, Twenty-
10 Third, Forty-Second, and Forty-Ninth.

11 11. Respondent agrees that his Veterinarian License and Premises Registrations are
12 subject to discipline and he agrees to be bound by the Board's probationary terms as set forth in
13 the Disciplinary Order below.

14 **RESERVATION**

15 12. The admissions made by Respondent herein are only for the purposes of this
16 proceeding, or any other proceedings in which the Veterinary Medical Board or other
17 professional licensing agency is involved, and shall not be admissible in any other criminal or
18 civil proceeding.

19 **CONTINGENCY**

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

1 considered this matter.

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

5 15. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an
6 integrated writing representing the complete, final, and exclusive embodiment of their agreement.
7 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
8 negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary
9 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a
10 writing executed by an authorized representative of each of the parties.

11 16. In consideration of the foregoing admissions and stipulations, the parties agree that
12 the Board may, without further notice or formal proceeding, issue and enter the following
13 Disciplinary Order:

14 **DISCIPLINARY ORDER**

15 IT IS HEREBY ORDERED that Veterinarian License No. VET 8662, Premises
16 Registration No. HSP 38355, and Premises Registration No. HSP 38157 issued to Respondent
17 Michael J. Sterns are revoked. However, the revocation is stayed and Respondent is placed on
18 probation for five (5) years on the following terms and conditions:

19 **1. Obey All Laws**

20 Respondent shall obey all federal and state laws and regulations substantially related to the
21 practice of veterinary medicine. Within thirty (30) days of any arrest, Respondent shall notify the
22 Board. Within thirty (30) days of any conviction., Respondent shall report to the Board and
23 provide proof of compliance with the terms and conditions of the court order including, but not
24 limited to, probation and restitution requirements. all obey all federal and state laws and
25 regulations substantially related to the practice of veterinary medicine. Further, within thirty (30)
26 days of any arrest or conviction. Respondent shall report to the Board and provide proof of
27 compliance with the terms and conditions of the court order including, but not limited to,
28 probation and restitution requirements.

1 2. **Quarterly Reports**

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

10 3. **Interview with the Board**

11 Within 30 days of the effective date of the Decision, Respondent shall appear in person for
12 an interview with the Board or its designee to review the terms and conditions of probation.
13 Thereafter, Respondent shall, upon reasonable request, report or appear in person as directed.

14 4. **Cooperation with Probation Staff**

15 Respondent shall cooperate with the Board's inspection program and with the Board's
16 monitoring and investigation of Respondent's compliance with the terms and conditions of his or
17 her probation. Respondent may receive the assistance of private counsel, but Respondent shall
18 communicate directly with the Board or its designee, and written communications from the Board
19 will only be sent to the Respondent. Respondent shall make available all patient records, hospital
20 records, books, logs, and other documents relating to the practice of veterinary medicine to the
21 Board, upon request.

22 Respondent shall claim all certified mail issued by the Board, respond in a timely manner to
23 all notices and requests for information, and submit Reports, Identification Update reports or
24 other reports similar in nature, as requested and directed by the Board or its designee. Respondent
25 is encouraged to contact the Board's probation monitoring program representative at any time
26 he/she has a question or concern regarding his or her terms and conditions of probation.

27 ///

28 ///

1 **5. Probation Monitoring Costs**

2 Probation monitoring costs are set at a rate of \$100 per month for the duration of the
3 probation. These costs shall be payable to the Board on a schedule as directed by the Board or its
4 designee.

5 **6. Changes of Employment or Address**

6 Respondent shall notify the Board, and appointed probation monitor in writing, of any and
7 all changes of employment, location, and address within fourteen (14) calendar days of such
8 change. This includes, but is not limited to, termination or resignation from employment, change
9 in employment status, and change in supervisors, administrators or directors. Respondent shall
10 also notify his or her probation monitor AND the Board IN WRITING of any changes of
11 residence or mailing address within fourteen (14) calendar days. P.O. Boxes are accepted for
12 mailing purposes; however, Respondent must also provide his or her physical residence address
13 as well.

14 **7. No Supervision of Students, Interns, or Residents**

15 Respondent shall not supervise students, interns, or residents.

16 **8. Notice to Employers**

17 During the period of probation, Respondent shall notify all present and prospective
18 employers of this Decision and the terms, conditions, and restrictions imposed on Respondent by
19 this Decision, as follows:

20 Within thirty (30) days of the effective date of this Decision and within fifteen (15) days
21 of Respondent undertaking any new employment, Respondent shall cause his or her supervisor
22 and/or managing licensee (licensee manager) to report to the Board in writing, acknowledging
23 that the listed individual(s) has/have read Decision, including the terms, conditions, and
24 restrictions imposed. It shall be Respondent's responsibility to ensure that his or her supervisor
25 and/or licensee manager submit timely acknowledgment(s) to the Board.

26 If Respondent provides veterinary services as a relief veterinarian, Respondent shall notify
27 each individual or entity with whom Respondent is employed or contracted and require the
28 supervisor and/or licensee manager to submit to the Board timely acknowledgement of receipt of

1 the notice.

2 **9. Notice to Employees**

3 Throughout the probationary period, and in a manner that is visible to all licensed,
4 registered, or permitted veterinary employees at the veterinary premises, Respondent shall post a
5 notice, provided or approved by the Board, that recites the violations for which Respondent has
6 been disciplined and the terms and conditions of probation.

7 **10. Tolling of Probation**

8 Respondent shall notify the Board or its designee in writing within fifteen (15) calendar
9 days of any periods of non-practice lasting more than thirty (30) calendar days and shall notify
10 the Board or its designee within fifteen (15) calendar days of Respondent's return to practice.

11 Any period of non-practice will result in the Respondent's probation being tolled.

12 Non-practice is defined as any period of time exceeding thirty (30) calendar days in which
13 Respondent is not engaging in the practice of veterinary medicine in California. While tolled for
14 residing/practicing outside of California, Respondent must comply with the following terms and
15 conditions of probation: obey all laws, quarterly reports, interview with the Board, tolling of
16 probation, maintain a current and active California license or registration, and cost recovery.

17 Non-practice is also defined as any period that Respondent fails to engage in the practice of
18 veterinary medicine in California for a minimum of 24 hours per week for the duration of
19 probation (except reasonable time away from work for vacations, illnesses, etc.) or as determined
20 by the Board. While tolled for not meeting the hourly requirement, Respondent shall comply with
21 all terms and conditions of this Decision.

22 Any period of tolling will not apply to the reduction of the probationary term.

23 **11. Maintain a Valid License**

24 At all times while on probation, Respondent shall maintain a current and active license with
25 the Board, including any period during which suspension or probation is tolled. If Respondent's
26 license, by operation of law or otherwise, expires, upon renewal, Respondent's license shall be
27 subject to any and all terms of this probation not previously satisfied.

28 ///

1 **12. Violation of Probation**

2 If Respondent violates probation in any respect, the Board, after giving Respondent notice
3 and the opportunity to be heard, may revoke probation and carry out the disciplinary order that
4 was stayed. If an accusation or petition to revoke probation is filed against Respondent during
5 probation, or if the Attorney General's office has been requested to prepare any disciplinary
6 action against Respondent's license, the Board shall have continuing jurisdiction until the matter
7 is final, and the period of probation shall be extended until the matter is final. No petition for
8 modification or termination of probation shall be considered while there is an accusation or
9 petition to revoke probation pending against Respondent.

10 **13. License Surrender While on Probation/Suspension**

11 Following the effective date of this Decision, should Respondent cease to practice
12 veterinary medicine due to retirement or health issues, or be otherwise unable to satisfy the terms
13 and conditions of probation, Respondent may tender his or her license to practice veterinary
14 medicine to the Board for surrender. The Board or its designee has the discretion to grant the
15 request for surrender or to take any other action it deems appropriate and reasonable. Upon
16 formal acceptance of the license surrender, Respondent will no longer be subject to the terms and
17 conditions of probation. The surrender constitutes a record of discipline and shall become a part
18 of the Respondent's license history with the Board.

19 Respondent must relinquish his or her license to the Board within ten (10) days of receiving
20 notification from the Board that the surrender has been accepted.

21 **14. Completion of Probation**

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

26 ///

27 ///

28 ///

1 15. **Cost Recovery**

2 Pursuant to Section 125.3 of the California Business and Professions Code, within thirty
3 (30) days of the effective date of this Decision, Respondent shall pay to the Board its enforcement
4 costs including investigation, and prosecution, in the amount of \$35,000.00 or in a Board-
5 approved payment plan, within six (6) months before the end of the probation term. Cost
6 recovery will not be tolled.

7 16. **Inspections**

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

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

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

22 17. **Medical Records**

23 Within 30 calendar days of the effective date of this Decision, Respondent shall provide to
24 the Board or its designee the name and qualifications of one or more proposed reviewer of the
25 medical records of animal patients created and maintained by Respondent. Each reviewer shall be
26 a licensed veterinarian in California, have held a valid California license for at least five (5) years,
27 and has never been subject to any disciplinary action by the Board.

28 ///

1 The Board or its designee shall provide the approved reviewer with copies of this
2 Decision. Within fifteen (15) calendar days of the reviewer's receipt of this Decision, the
3 reviewer shall sign an affirmation that he or she has reviewed the terms and conditions of this
4 Decision and fully understands the role of the reviewer.

5 If Respondent fails to obtain the Board's or its designee's approval of a reviewer within
6 sixty (60) calendar days of the effective date of this Decision, Respondent shall receive a
7 notification from the Board or its designee to cease practicing veterinary medicine within three
8 (3) calendar days after being notified. Respondent shall cease practice until a reviewer is
9 approved to provide medical records review services.

10 The reviewer shall review a minimum of ten percent (10%) of Respondent's animal
11 patient medical records or fifteen (15) records (whichever is greater), a minimum of twelve (12)
12 times per year. The reviewer shall determine the method of random selection of medical records
13 to review and shall access the medical records directly from where the medical records are being
14 kept. Review of Respondent's medical records shall not be delegated to Respondent or
15 Respondent's staff. The reviewer's random selection of medical records shall include medical
16 records that correlate to the animal patient care issues or other issues identified in the disciplinary
17 action that resulted in this Decision. Respondent is required to make all animal patient medical
18 records available for immediate inspection and copying by the reviewer at all times during
19 business hours. The reviewer shall immediately notify the Board's Probation Monitor if
20 Respondent fails or refuses to make the medical records available for inspection and/or copying.

21 Any potential costs associated with conducting the medical records review shall be borne
22 by Respondent.

23 The reviewer shall evaluate the medical records to assess:

- 24 1) The medical necessity and appropriateness of Respondent's
25 treatment;
- 26 2) Respondent's compliance with minimum standards of practice in
27 the diagnosis and treatment of animal patients;
- 28 3) Respondent's maintenance of necessary and appropriate treatment;

- 1 4) Respondent's maintenance of necessary and appropriate records and
2 chart entries; and,
3 5) Respondent's compliance with existing statutes and regulations
4 governing the practice of veterinary medicine.

5 The reviewer shall submit quarterly reports to the Board on a form designated by the
6 Board. The reports shall be submitted by the reviewer directly to the Board's Probation Monitor
7 within seven (7) calendar days after the end of the preceding quarter. The quarterly reporting
8 periods and due dates are as follows:

9

Reporting Time Period	Due No Later Than
January 1 to March 31 (Quarter I)	April 7
April 1 to June 30 (Quarter II)	July 7
July 1 to September 30 (Quarter III)	October 7
October 1 to December 31 (Quarter IV)	January 7

10
11
12
13

14 18. **No New Ownership**

15 Respondent shall not have any new legal or beneficial interest in any veterinary business,
16 firm, partnership, or corporation for the duration of his or her probation.

17 19. **Continuing Education**

18 Within sixty (60) days of the effective date of this Decision, and on an annual basis
19 thereafter, Respondent shall submit to the Board for its prior approval, an educational program or
20 courses related to Respondent's specific area(s) of weakness which, which shall not be less than
21 twenty (20) hours per year, for each year of probation, as follows: not less than four (4) hours per
22 year related to recordkeeping, not less than four (4) hours per year related to administration of
23 antibiotics, not less than four (4) hours per year observing surgical procedures at a spay and
24 neuter facility, not less than four (4) hours per year related to pain management, and not less than
25 four (4) hours per year related to updates in veterinary medicine. Upon successful completion of
26 the courses and observation hours, Respondent shall provide proof to the Board. This program
27 shall be in addition to the Continuing Education required of all licensees for licensure renewal.
28 All costs shall be borne by Respondent.

20. **Ethics Training**

Respondent shall submit to the Board for its prior approval, an ethics training course for a minimum of four (4) hours per each year during the probationary period. Respondent shall provide proof of successful completion of the course, to the Board. All costs shall be borne by Respondent.

ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Michael A. Firestone. I understand the stipulation and the effect it will have on my Veterinarian License, and Premises Permit. 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: 04/18/2021

SIGNATURE ON FILE

MICHAEL J. STERNS
Respondent

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

DATED: 4-19-2021

SIGNATURE ON FILE

MICHAEL A. FIRESTONE
Attorney for Respondent

ENDORSEMENT

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

DATED: April 19, 2021

Respectfully submitted,

MATTHEW RODRIQUEZ
Acting Attorney General of California
JOSHUA A. ROOM
Supervising Deputy Attorney General

SIGNATURE ON FILE

NEVA L. TASSAN
Deputy Attorney General
Attorneys for Complainant

Exhibit A

Second Amended Accusation No. 4602017001022

MATTHEW RODRIGUEZ
Acting Attorney General of California
CHAR SACHSON
Supervising Deputy Attorney General
JUDITH J. LOACH
Deputy Attorney General
State Bar No. 162030
455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004
Telephone: (415) 510-3483
Facsimile: (415) 703-5480
E-mail: Judith.Loach@doj.ca.gov
Attorneys for Complainant

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

In the Matter of the Accusation Against:

Case No. 4602017001022

**MICHAEL J. STERNS
Alta View Animal Hospital
690 Showers Drive
Mountain View, CA 94040-1434**

SECOND AMENDED ACCUSATION

**Veterinarian License No. VET 8662
Premises Registration No. HSP 4645
Premises Registration No. HSP 38355
Premises Registration No. HSP 38157**

Respondents.

Complainant alleges:

PARTIES

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

2. On or about July 25, 1984, the Board issued Veterinarian License Number VET 8662 to Respondent Michael J. Sterns (Respondent). The Veterinarian License was in full force and effect at all times relevant to the charges brought herein and will expire on August 31, 2022, unless renewed.

3. On or about April 27, 1993, the Board issued Premises Registration Number HSP 4645 to Alta View Animal Hospital (AVAH), in Mountain View, California. The Premises Registration lapsed from May 16, 2016 to August 1, 2016, and from June 1, 2017 to February 15, 2018. On or about February 14, 2018, Respondent associated as the Managing Licensee of AVAH. The Premises Registration was in full force and effect at all times relevant to the charges brought herein. The Premises Registration was cancelled on June 22, 2020, and revoked on July 13, 2020. On or about July 9, 2020, the Board issued Premises Registration Number HSP 38355 to AVAH, with Respondent as the Managing Licensee. The Premises Registration will expire on July 31, 2021, unless renewed.

4. Respondent operates a mobile veterinary clinic known as 4Paws Mobile Veterinary Services. Respondent operated this mobile veterinary clinic before it had a Premises Registration. On or about February 18, 2020, the Board issued Premises Registration Number HSP 38157 to 4Paws Mobile Veterinary Services, with Respondent as Managing Licensee and Sole Owner. The Premises Registration will expire on February 28, 2022, unless renewed.

JURISDICTION

5. This Second Amended Accusation is brought before the Board under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

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

7. Section 4853.6 of the Code provides, in pertinent part, that the Board shall withhold, suspend or revoke registration of veterinary premises when the license of the licensee manager to practice veterinary medicine is revoked or suspended.

///

STATUTORY PROVISIONS

8. Section 143.5 [**Provisions in agreement to settle certain causes of action prohibited**] of the Code states:

“(a) No licensee who is regulated by a board, bureau, or program within the Department of Consumer Affairs, nor an entity or person acting as an authorized agent of a licensee, shall include or permit to be included a provision in an agreement to settle a civil dispute, whether the agreement is made before or after the commencement of a civil action, that prohibits the other party in that dispute from contacting, filing a complaint with, or cooperating with the department, board, bureau, or program within the Department of Consumer Affairs that regulates the licensee or that requires the other party to withdraw a complaint from the department, board, bureau, or program within the Department of Consumer Affairs that regulates the licensee. A provision of that nature is void as against public policy, and any licensee who includes or permits to be included a provision of that nature in a settlement agreement is subject to disciplinary action by the board, bureau or program.

...”

9. Section 4883 [**Denial, revocation, or suspension of license or registration; Grounds**] of the Code states:

"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].

...

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

"(j) Aiding or abetting in any acts that are in violation of any of the provisions of this chapter [the Veterinary Medicine Practice Act].

...

"(o) Violation, or the assisting or abetting violation, of any regulations adopted by the board pursuant to this chapter [the Veterinary Medicine Practice Act]."

10. Section 4853 [**Premises Registration**] of the Code states:

“(a) All premises where veterinary medicine, veterinary dentistry, veterinary surgery, and the various branches thereof is being practice 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 include a building, kennel, mobile unit, or vehicle. Mobile units and vehicles shall be exempted from independent registration with the board when they are operated from a building or facility which 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.

REGULATORY PROVISIONS

11. California Code of Regulations, title 16, section 2032.1 [**Veterinarian-Client-Patient Relationship**], states:

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

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

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

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

///

1 “(3) The veterinarian has assumed responsibility for making medical judgments regarding
2 the health of the animal and has communicated with the client a course of treatment appropriate
3 to the circumstances.

4 “(c) A drug shall not be prescribed for a duration inconsistent with the medical condition
5 of the animal(s) or type of drug prescribed. The veterinarian shall not prescribe a drug for a
6 duration longer than one year from the date the veterinarian examined the animal(s) and
7 prescribed the drug.

8 “(d) As used herein, ‘drug’ shall mean any controlled substance as defined by Section
9 4021 of the Business and Professions code, and any dangerous drug, as defined by Section 4022
10 of Business and Professions code.

11 12. California Code of Regulations, title 16, section 2032.3, [**Record Keeping; Records;**
12 **Contents; Transfer**] states:

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

17 (1) Name or initials of the person responsible for entries.

18 (2) Name, address and phone number of the client.

19 (3) Name or identity of the animal, herd or flock.

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

21 (5) Dates (beginning and ending) of custody of the animal, if applicable.

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

24 (7) Data, including that obtained by instrumentation, from the physical
25 examination.

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

28 ///

1 (9) Records for surgical procedures shall include a description of the
2 procedure, the name of the surgeon, the type of sedative/anesthetic agents used, their
3 route of administration, and their strength if available in more than one strength.

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

5 (11) If relevant, a prognosis of the animal's condition.

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

8 . . .”

9 13. California Code of Regulations, title 16, section 2032.4 [**Anesthesia**] states:

10 “(a) General anesthesia is a condition caused by the administration of a drug or
11 combination of drugs sufficient to produce a state of unconsciousness or dissociation and blocked
12 response to a given pain or alarming stimulus.

13 “(b) When administering general anesthesia, a veterinarian shall comply with the
14 following standards:

15 “(1) Within twelve (12) hours prior to the administration of a general anesthetic, the
16 animal patient shall be given a physical examination by a licensed veterinarian appropriate for the
17 procedure. The results of the physical examination shall be documented in the animal patient’s
18 medical records.

19 “(2) An animal under general anesthesia shall be observed for a length of time appropriate
20 for its safe recovery.

21 “(3) Provide respiratory monitoring including, but not limited to, observation of the
22 animal’s chest movements, observation of the rebreathing bag or respirometer.

23 “(4) Provide cardiac monitoring including, but not limited to, the use of a stethoscope,
24 pulseoximeter or electrocardiographic monitor.

25 “(5) When administering general anesthesia in a hospital setting, a veterinarian shall have
26 resuscitation or rebreathing bags of appropriate volumes for the animal patient and an assortment
27 of endotracheal tubes readily available.

28 ///

1 “(6) Records for procedures involving general anesthesia shall include a description of the
2 procedure, the name of the surgeon, the type of sedative and/or anesthetic agents used, their route
3 of administration, and their strength if available in more than one strength.

4 14. California Code of Regulations, title 16, section 2032.05 [**Humane Treatment**]
5 states:

6 “When treating a patient, a veterinarian shall use appropriate and humane care to minimize
7 pain and distress before, during and after performing any procedure(s).”

8 15. California Code of Regulations, title 16, section 2032.15 [**Veterinarian-Client-**
9 **Patient Relationship in Absence of Client Communication**] states:

10 “(a) A veterinary-client-patient relationship may continue to exist, in the absence of client
11 communication, when:

12 (1) A veterinary-client-patient relationship was established with an original veterinarian,
13 and another designated veterinarian serves in the absence of the original veterinarian, and;

14 (2) The designated veterinarian has assumed responsibility for making medical judgments
15 regarding the health of the animal(s), and;

16 (3) The designated veterinarian has sufficient knowledge of the animal(s) to initiate at
17 least a general or preliminary diagnosis of the medical condition of the animal(s). This means that
18 the veterinarian is personally acquainted with the care of the animal(s) by virtue of an
19 examination of the animal(s) or by medically appropriate and timely visits to the premises where
20 the animal(s) is kept, or has consulted with the veterinarian who established the veterinary-client-
21 patient relationship, and;

22 (4) The designated veterinarian has continued the medical, treatment, diagnostic and/or
23 therapeutic plan that was set forth and documented in the medical record by the original
24 veterinarian.

25 “(b) If the medical, treatment, diagnostic and/or therapeutic plan differs from that which
26 was communicated to the client by the original veterinarian, then the designated veterinarian must
27 attempt to communicate the necessary changes with the client in a timely manner.”

28 ///

1 **COST RECOVERY**

2 16. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
3 administrative law judge to direct a licentiate found to have committed a violation or violations of
4 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
5 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being
6 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
7 included in a stipulated settlement.

8 **GENERAL STATEMENT OF FACTS**

9 17. On all dates relevant, Respondent worked at AVAH with veterinarians Tejpaal
10 Ghumman (Ghumann) and Suji Gurushav.

11 18. Respondent performed surgical procedures on animals and/or provided care to
12 animals brought to AVAH.

13 19. Respondent also assumed the position as the supervising veterinarian for Ghumman
14 who on April 29, 2014, was placed on a four (4) year term of probation with the Veterinary
15 Medical Board.¹

16 **STATEMENT OF FACTS REGARDING "BOOBOO"**

17 20. On April 22, 2016, Irina B. took her 11-year old male canine BooBoo to Ghumman
18 for various complaints. On May 10, 2016, Ghumman allegedly consulted with Respondent
19 regarding BooBoo's serious condition. Respondent failed to document any notes regarding this
20 consultation. Irina B continued to treat with Ghumman until June 11, 2016.

21 21. On June 14, 2016, Irina B. took BooBoo to another veterinary clinic. An ultrasound
22 revealed a large liver mass. On recommendation of the attending veterinarian, BooBoo was
23 euthanized.

24 ///

25 ///

26 _____
27 ¹ *In The Matter of the Accusation Against: Tejpaal Ghumman*, Case No. AV 2013 29, the
28 Veterinary Medical Board placed Ghumman on four (4) years of probation. A condition of
probation was that Ghumman have a supervising veterinarian.

22. On or about August 8, 2016, Respondent met with BooBoo's owners regarding their concerns as to the treatment provided by Ghumman. Respondent presented the owners with a two-page document entitled "**FULL RELEASE OF ALL CLAIMS.**" Beneath the title of this document, in smaller typeface appeared the following admonition:

“Read this Document Carefully

When you Sign It, You Give

Up Certain Rights"

23. The agreement, not signed by Booboo's owners, provided in relevant part that:

For in consideration of the payment to (owners of BooBoo) of the sum Seven hundred and forty nine dollars (\$749.00), and other good and valuable consideration, (owners) . . . release, acquit and forever discharge Alta View Animal Hospital, Paul Ghumman, Suji Gurushav and Michael Sterns, . . . from any and all past, present and future actions, . . . including claims or suits *to any licensing body*, for contribution and/or indemnity, of whatever nature, and all consequential damage on account of, or in any way growing out of any and all claims resulting from the medical treatment of BooBoo at Alta View Animal Hospital. (Emphasis added.)

FIRST CAUSE FOR DISCIPLINE

(Unprofessional Conduct - Seeking Prohibited Settlement)

24. Respondent is subject to discipline for unprofessional conduct pursuant to Code sections 4883, subdivisions (c) and (j), and 143.5, in that he attempted to enter into a prohibited settlement with BooBoo's owners, having them give up their right to report Respondent and Ghumman to the Veterinary Medical Board in exchange for reimbursement of fees paid to AVAH. The facts in support of this cause for discipline are set forth above in paragraphs 20 through 23.

STATEMENT OF FACTS REGARDING “MABEL”

25. On July 10, 2017, owner Courtney B. took her 11-week old canine Mabel to AVAH to be spayed. She briefly met with Ghumman, and at no time was she advised and/or did she consent to Respondent performing the spay procedure.

///

///

///

1 26. Two separate sets of records were provided to the Board for review. Electronic
2 Medical Records (EMR)² were received by the owner (Copy A). A different set of EMR's were
3 received from Ghumman (Copy B).³ The EMR provided to the owner made no reference to a
4 physical examination being performed prior to the spay procedure.

5 27. On July 10, 2017, Respondent completed a Certification of Vaccination documenting
6 that at 11 weeks of age, he administered a Rabies Vaccine to Mabel. Respondent administered
7 this vaccination to Mabel without the owner's direct consent.

8 28. A handwritten Ovariohysterectomy form was completed by Respondent on July 10,
9 2017. However, this document failed to include the following:

- 10 A. Documentation of a physical examination prior to surgery.
- 11 B. Location and/or size of the intravenous catheter placed prior to surgery.
- 12 C. Documentation of the concentration of the various anesthetic drugs given prior to
13 and/or during the spay procedure.
- 14 D. Documentation regarding the route by which the various anesthetic drugs were
15 administered and the route of administration of the reversal agent Yohimbine.
- 16 E. Documentation as to the type of respiratory or cardiac monitoring during the spay
17 procedure and/or documentation as to Mabel's heart rate and oxygen saturations throughout the
18 spay procedure.
- 19 F. Documentation of the pain medications that were given after the procedure.
- 20 G. Without indication, pre-operatively Mabel was given Baytril and PPG.⁴
- 21 H. Post-operatively Respondent recommended Rimadyl, an anti-inflammatory
22 medication when another anti-inflammatory medication Metacam had been given pre-operatively.

23 ///

24 ² The EMR software system used at Alta View was Avimark (2010.4). This system had a
25 feature in which data entered into a client record was locked with the time and date that the entry
26 was made. However, this "time-stamped" feature was not utilized at Alta View. Accordingly,
client records could be altered at a later date without detection.

27 ³ Copy A (EMR from the owner) was printed on July 22, 2017. Copy B (EMR from
28 Ghumman) was printed on September 6, 2017, in response to the Board informing Ghumman that
Mabel's owner had filed a complaint on August 3, 2017.

⁴ Baytril is an antibiotic. PPG refers to Procaine Penicillin G.

1 **SECOND CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct – Failure to Establish a Veterinarian Client Relationship)**

3 29. Respondent is subject to discipline for unprofessional conduct pursuant to Code
4 section 4883(c) and California Code of Regulations, Title 16, section 2032.1 and 2032.15 in that
5 he failed to document that he had an established veterinarian-client relationship with Mabel prior
6 to performing a spay procedure. The facts in support of this cause for discipline are set forth
7 above in paragraphs 25 and 28.

8 **THIRD CAUSE FOR DISCIPLINE**

9 **(Unprofessional Conduct – Failure to Perform and/or Document**
10 **Physical Examination Prior to Surgery)**

11 30. Respondent is subject to discipline for unprofessional conduct pursuant to Code
12 section 4883(c) and California Code of Regulations, Title 16, section 2032.4(b)(1), in that he
13 failed to perform and/or document a physical examination on Mabel prior to her spay procedure.
14 The facts in support of this cause for discipline are set forth above in 26 and 28.

15 **FOURTH CAUSE FOR DISCIPLINE**

16 **(Unprofessional Conduct – Record Keeping Violations)**

17 31. Respondent is subject to discipline for unprofessional conduct pursuant to Code
18 section 4883(i) and California Code of Regulations, Title 16, section 2032.3(a)(9) in that he failed
19 to document the following:

- 20 A. Location and/or size of the intravenous catheter placed prior to surgery.
- 21 B. Documentation of the concentration of the various anesthetic drugs given prior to
22 and/or during the spay procedure.
- 23 C. Documentation regarding the route by which the various anesthetic drugs were
24 administered and the route of administration of the reversal agent Yohimbine.

25 ///

26 ///

27 ///

1 D. Documentation as to the type of respiratory or cardiac monitoring during the spay
2 procedure and/or documentation as to Mabel's heart rate and oxygen saturations throughout the
3 spay procedure.

4 The facts in support of this cause for discipline are set forth above in paragraph 28.

5 **FIFTH CAUSE FOR DISCIPLINE**

6 **(Negligence – Medication Administration)**

7 32. Respondent is subject to discipline for negligence pursuant to Code section 4883(i),
8 based on his administration, without indication, of two different antibiotics pre-operatively and
9 administration of two different anti-inflammatory medications post-operatively to Mabel. The
10 facts in support of this cause for discipline are set forth above in paragraph 28.

11 **SIXTH CAUSE FOR DISCIPLINE**

12 **(Unprofessional Conduct – Administration of Rabies Vaccination**
13 **without Owner's Consent)**

14 33. Respondent is subject to discipline for unprofessional conduct pursuant to Code
15 section 4883, subdivisions (c) and (i), and California Code of Regulations, Title 16, section
16 2032.1, in that without the owner's consent and/or knowledge, he administered a rabies
17 vaccination to Mabel. The facts in support of this cause for discipline are set forth above in
18 paragraph 27.

19 **STATEMENT OF FACTS REGARDING "JOONEY"**

20 34. On September 25, 2014, Previn B. took her 6-month-old canine Jooney to AVAH to
21 be spayed. Respondent performed the spay procedure without documentation that he had met the
22 owner.

23 35. Two separate sets of records were kept by AVAH. Jooney's file contained
24 handwritten records as well as electronic medical records (EMR). The handwritten Medical
25 History Form titled Ovariohysterectomy failed to include the following:

26 A. Documentation that a physical examination and/or assessment was completed prior to
27 surgery.

28 ///

1 B. Initials and/or signature that Respondent performed the spay surgery.

2 C. The dosage of medications given for induction of anesthesia.

3 36. The spay procedure lasted 20 minutes and was without complications.

4 Postoperatively, without indication, Respondent administered two different antibiotics:

5 Baytril and PPG.

6 37. On the day of the surgery, Respondent administered 65 milligrams of Metacam, a
7 non-steroidal anti-inflammatory medication. The following day, without indication, Respondent
8 prescribed a 10-day course of 100 milligrams of Rimadyl, another non-steroidal anti-
9 inflammatory medication. The handwritten records made no mention of this medication being
10 prescribed.

11 38. On October 9, 2014, Jooney presented for vaccinations. Respondent failed to
12 document a history, physical examination, intended treatment plan or assessment on either the
13 handwritten record of the EMR. The handwritten record made reference to de-worming, but there
14 was no reference to the medication, dosage, or route of administration of any de-worming
15 medication.

16 39. On November 10, 2014, Jooney presented to AVAH for vaccinations. There was no
17 documentation of a physical examination or interim history being completed on either the
18 handwritten record or the EMR. On the handwritten record there is reference to Jooney being
19 vaccinated with DHLPP whereas on the EMR it was documented that she received the DHP-PV
20 vaccination.⁵

21 ///

22 ///

23 ///

24 ///

25 ///

26 ⁵ The DHLPP vaccine includes distemper, hepatitis, leptospirosis, parvovirus and
27 parainfluenza. In contrast, the DHP-PV vaccine includes distemper, adenovirus, parvovirus and
28 parainfluenza.

40. From November 20, 2014 to December 1, 2014, Jooney was boarded at AVAH. On November 28, 2014, the handwritten record indicates that Respondent gave Jooney “0.25 cc Ace sq” for anxiety.⁶ Respondent did not include his initials and/or sign the record that he had administered this medication. The EMR made no reference to this medication being administered. There was no documentation that Jooney’s owner authorized or was even aware that this medication was given and/or any history that Jooney had prior problems with anxiety.

41. On December 4, 2014, Jooney's owner was given a prescription for Metonidazole with the name of Respondent as the prescriber.⁷ The handwritten record noted that "dog has loose, bloody stool" without documentation of a physical examination and/or assessment. It is unclear from the records if Jooney was even seen at AVAH or if the owner called in with a complaint regarding Jooney. A handwritten note referenced that a fecal test for ova and parasites was performed. However, there was no documentation as to the test results.

SEVENTH CAUSE FOR DISCIPLINE

(Unprofessional Conduct – Failure to Establish a Veterinarian Client Relationship)

42. Respondent is subject to discipline for unprofessional conduct pursuant to Code section 4883(c) and California Code of Regulations, Title 16, section 2032.1 and 2032.15 in that he failed to document that he had an established veterinarian-client relationship with Jooney prior to performing a spay procedure. The facts in support of this cause for discipline are set forth above in paragraphs 34 and 35.

///

///

///

///

///

⁶ “Ace” is shorthand for the anti-anxiety medication Acepromazine.

⁷ Metronidazole is an antibiotic/antiprotozoal prescribed for bacterial and/or parasitic infections.

1 **EIGHTH CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct – Failure to Perform and/or Document**

3 **Physical Examination Prior to Surgery)**

4 43. Respondent is subject to discipline for unprofessional conduct pursuant to Code
5 section 4883(c) and California Code of Regulations, Title 16, section 2032.4(b)(1), in that he
6 failed to perform and/or document a physical examination on Jooney prior to her spay procedure.
7 The facts in support of this cause for discipline are set forth above in paragraphs 34 and 35.

8 **NINTH CAUSE FOR DISCIPLINE**

9 **(Negligence – Medication Administration)**

10 44. Respondent is subject to discipline for negligence pursuant to Code section 4883(i),
11 based on his administration, without indication, of two different antibiotics pre-operatively and
12 administration of two different anti-inflammatory medications post-operatively to Jooney. The
13 facts in support of this cause for discipline are set forth above in paragraphs 36 and 37.

14 **TENTH CAUSE FOR DISCIPLINE**

15 **(Unprofessional Conduct – Administration of Medication Without Owner's Consent)**

16 45. Respondent is subject to discipline for unprofessional conduct pursuant to Code
17 section 4883, subdivisions (c) and (i), and California Code of Regulations, Title 16, section
18 2032.1, in that without the owner's consent and/or knowledge, he administered an anti-anxiety
19 medication to Jooney on November 28, 2014. The facts in support of this cause for discipline are
20 set forth above in paragraph 40.

21 **ELEVENTH CAUSE FOR DISCIPLINE**

22 **(Unprofessional Conduct – Failure to Include Minimal Documentation**

23 **for Surgical Procedure)**

24 46. Respondent is subject to discipline for unprofessional conduct pursuant to Code
25 section 4883(c) and California Code of Regulations, Title 16, sections 2032.3 and 2032.4, in that
26 he failed to include the minimum documentation required for performing a spay procedure. The
27 facts in support of this cause for discipline are set forth above in paragraphs 35.

28 ///

1 **TWELFTH CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct – Record Keeping Violations)**

3 47. Respondent is subject to discipline for unprofessional conduct pursuant to Code
4 section 4883, subdivisions (c) and (i), and California Code of Regulations, Title 16, section
5 2032.3, in that the records for Jooney failed to include the following:

6 A. The initials and/or name of the individual who made entries in the handwritten record
7 on September 25, 2014, November 10, 2014, November 20, 2014, November 28, 2014, and
8 December 4, 2014 as required by California Code of Regulations, Title 16, section 2032.3(a)(6).

9 B. An updated interim history of Jooney prior to giving vaccinations on October 9, 2014,
10 and November 10, 2014 as required by California Code of Regulations, Title 16, section
11 2032.3(a)(1).

12 C. A physical examination prior to Jooney's surgery on September 25, 2014, and prior to
13 administering vaccinations to Jooney on October 9, 2014, and November 10, 2014 as required by
14 California Code of Regulations, Title 16, section 2032.3(a)(7).

15 D. An intended treatment plan prior to giving Jooney vaccinations on October 9, 2014,
16 and November 10, 2014, as required by California Code of Regulations, Title 16, section
17 2032.3(a)(8).

18 E. Documentation regarding the deworming medication administered on October 9,
19 2014, including the name of the medication, dosage and route of administration as required by
20 California Code of Regulations, Title 16, section 2032.3(a)(8).

21 The facts in support of this cause for discipline are set forth above in paragraphs 34
22 through 41.

23 **STATEMENT OF FACTS REGARDING "OSCAR"**

24 48. On March 19, 2015, Amav S. took her 9 week old canine Oscar to AVAH for
25 vaccinations. On March 20, 2015, Ghumman diagnosed Oscar with enteritis, a gastrointestinal
26 infection for which he received treatment.

27 ///

28 ///

1 49. On April 24, 2015, Oscar presented to AVAH for vaccinations. In a handwritten
2 note, Respondent wrote that Oscar had a normal physical examination. However, there was no
3 documentation of a pertinent interval history, treatment plan or assessment. Respondent failed to
4 sign his note and/or reference by his initials that he had seen Oscar on this date.

5 50. On August 20, 2015, Oscar presented to AVAH to be neutered. Respondent
6 performed the neuter procedure without documentation that he had met the owner. The surgical
7 procedure was documented on a handwritten note entitled Canine Neuter. The entries on this
8 form failed to include the following:

- 9 A. Documentation that a physical exam was performed prior to the surgery.
- 10 B. Initials and/or a signature that Respondent performed the spay procedure.
- 11 C. Documentation of the dosage and route of medications administered during surgery
12 for anesthesia.
- 13 D. Documentation of Oscar's age, sex, species, color and/or weight.

14 51. Postoperatively, without indication, Respondent administered two different antibiotics,
15 Baytril and PPG. On the Canine Neuter record, the amount of PPG was recorded as 0.5 cc., but
16 on the handwritten notes 0.3 cc was documented as being administered.

17 52. On the day of the surgery, Respondent administered 140 milligrams of Metacam, a
18 non-steroidal anti-inflammatory medication without documentation of the route by which this
19 medication was administered. The following day, without indication, Respondent prescribed a
20 10-day course of 150 milligrams of Rimadyl, a different non-steroidal anti-inflammatory
21 medication.

22 53. On January 7, 2016, Oscar presented with a history of loose stools and lack of
23 appetite. Inpatient treatment was documented as "fluids and injections given by Dr. Sterns" on
24 the EMR without reference to the type of fluids administered and/or documentation as to the
25 medications administered. The handwritten record noted that an IV catheter was placed with
26 documentation that "1.25l 0.25l in the first bag" without clarification of what this entry meant.
27 Several drugs were added to the intravenous infusion without documentation of rate of the
28 intravenous infusion.

1 **THIRTEENTH CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct – Failure to Establish a Veterinarian Client Relationship)**

3 54. Respondent is subject to discipline for unprofessional conduct pursuant to Code
4 section 4883(c) and California Code of Regulations, Title 16, section 2032.1 and 2032.15 in that
5 he failed to document that he had an established veterinarian-client relationship
6 with Oscar prior to performing a neuter procedure. The facts in support of this cause for discipline
7 are set forth above in paragraph 50.

8 **FOURTEENTH CAUSE FOR DISCIPLINE**

9 **(Unprofessional Conduct – Failure to Perform and/or Document**
10 **Physical Examination Prior to Surgery)**

11 55. Respondent is subject to discipline for unprofessional conduct pursuant to Code
12 section 4883(c) and California Code of Regulations, Title 16, section 2032.4(b)(1), in that he
13 failed to perform and/or document a physical examination on Oscar prior to his neuter procedure.
14 The facts in support of this cause for discipline are set forth above in paragraph 50.

15 **FIFTEENTH CAUSE FOR DISCIPLINE**

16 **(Unprofessional Conduct – Failure to Include Minimal Documentation**
17 **for Surgical Procedure)**

18 56. Respondent is subject to discipline for unprofessional conduct pursuant to Code
19 section 4883(c) and California Code of Regulations, Title 16, sections 2032.3 and 2032.4, in that
20 he failed to include the minimum documentation required in a neuter procedure. The facts in
21 support of this cause for discipline are set forth above in paragraph 50.

22 **SIXTEENTH CAUSE FOR DISCIPLINE**

23 **(Negligence – Medication Administration)**

24 57. Respondent is subject to discipline for negligence pursuant to Code section 4883(i),
25 based on his administration, without indication, of two different antibiotics pre-operatively and
26 administration of two different anti-inflammatory medications post-operatively to Oscar. The
27 facts in support of this cause for discipline are set forth above in paragraphs 51 and 52.

28 ///

1 **SEVENTEENTH CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct – Record Keeping Violations)**

3 58. Respondent is subject to discipline for unprofessional conduct pursuant to Code
4 section 4883, subdivisions (c) and (i), and California Code of Regulations, Title 16, section
5 2032.3, in that the records for Oscar failed to include the following:

6 A. Respondent's initials or signature for the April 24, 2015 visit as required by
7 California Code of Regulations, Title 16, section 2032.3(a)(6).

8 B. A pertinent interval history, treatment plan or assessment of Oscar on April 24, 2015,
9 as required by the California Code of Regulations, Title 16, section 2032.3(a)(1).

10 C. A physical examination prior to Oscar's neuter surgery on August 20, 2015, as
11 required by the California Code of Regulations, Title 16, section 2032.3(a)(7).

12 D. Documentation of the dosage and route of medications administered during surgery
13 for anesthesia as required by the California Code of Regulations, Title 16, section 2032.3(a)(9).

14 E. Documentation of Oscar's age, sex, species, color and/or weight as required by the
15 California Code of Regulations, Title 16, section 2032.3(a)(4).

16 F. Rate of administering intravenous fluids to Oscar on January 7, 2016, as required by
17 required by the California Code of Regulations, Title 16, section 2032.3(a)(12). The facts in
18 support of this cause for discipline are set forth above in paragraphs 49 to 53.

19 **STATEMENT OF FACTS REGARDING "SPORTY"**

20 59. On May 29, 2015, Pete S. took his 17-year-old feline to AVAH for a dental extraction
21 and cleaning. Respondent performed the dental procedure without any indication that the owner
22 was aware that Respondent was performing the surgery. The dental procedure was recorded on a
23 Medical History Form and failed to include the following:

24 A. Initials and/or signature that Respondent performed the dental procedure.

25 B. Documentation of a physical exam prior to the dental procedure.

26 C. Pre-surgical documentation of blood test results.

27 D. Documentation regarding the anesthetic medications used for the dental cleaning
28 which also resulted in a dental extraction.

1 E. Documentation regarding which tooth was extracted during the dental procedure.

2 F. Documentation of any medications prescribed post-operatively for pain.

3 60. On December 5, 2016, Sporty presented for another dental extraction and cleaning.

4 There was no documentation that Respondent met with the owner prior to the surgical procedure.

5 Despite his owner reporting that Sporty had lost weight, laboratory testing results were not

6 available prior to the surgery. The dental procedure was recorded on a Medical History Form

7 which failed to include the following:

8 A. Initials and/or signature that Respondent performed the dental procedure.

9 B. Documentation of a physical exam prior to the surgery.

10 C. Pre-surgical documentation of blood test results.

11 D. The dosage of Midazolam that was administered for induction of anesthesia without
12 indication if an intravenous line or endotracheal tube was placed for the procedure.

13 E. Documentation of any medications prescribed post-operatively for pain.

14 61. Without indication, two different antibiotics, PPG and Baytril, were administered.

15 **EIGHTEENTH CAUSE FOR DISCIPLINE**

16 **(Unprofessional Conduct – Failure to Establish a Veterinarian Client Relationship)**

17 62. Respondent is subject to discipline for unprofessional conduct pursuant to Code
18 section 4883(c) and California Code of Regulations, Title 16, section 2032.1 and 2032.15 in that
19 he failed to document that he had an established veterinarian-client relationship with Sporty prior
20 to performing the dental procedures. The facts in support of this cause for discipline are set forth
21 above in paragraphs 59 and 60.

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 **NINETEENTH CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct – Failure to Perform and/or Document**

3 **Physical Examination Prior to Surgery)**

4 63. Respondent is subject to discipline for unprofessional conduct pursuant to Code
5 section 4883(c) and California Code of Regulations, Title 16, section 2032.4(b)(1), in that he
6 failed to perform and/or document a physical examination on Sporty prior to the dental surgery on
7 May 29, 2015 or December 5, 2016. The facts in support of this cause for discipline are set forth
8 above in paragraphs 59 to 60.

9 **TWENTIETH CAUSE FOR DISCIPLINE**

10 **(Negligence -- Medication Administration)**

11 64. Respondent is subject to discipline for negligence pursuant to Code section 4883(i),
12 based on his administration, without indication, two different antibiotics were given for Sporty's
13 December 5, 2016, dental procedure. The facts in support of this cause for discipline are set forth
14 above in paragraphs 61.

15 **TWENTY-FIRST CAUSE FOR DISCIPLINE**

16 **(Unprofessional Conduct – Failure to Provide Humane Treatment)**

17 65. Respondent is subject to discipline for unprofessional conduct pursuant to California
18 Code of Regulations, Title 16, section 2032.05, in that he failed to provide humane treatment to
19 Sporty in that no pain medications were prescribed after his dental extractions. The facts in
20 support of this cause for discipline are set forth above in paragraphs 59 and 60.

21 **TWENTY-SECOND CAUSE FOR DISCIPLINE**

22 **(Unprofessional Conduct – Record Keeping Violations)**

23 66. Respondent is subject to discipline for unprofessional conduct pursuant to Code
24 section 4883, subdivisions (c) and (i), and California Code of Regulations, Title 16, section
25 2032.3, in that the records for Sporty failed to include the following:

26 A. Respondent's initials or signature as the veterinarian performing the dental surgery
27 on May 29, 2015 and December 5, 2016, as required by California Code of Regulations, Title 16,
28 section 2032.3, subdivisions (a)(1) and (a)(9).

1 B. Documentation that a physical examination was performed prior to the dental
2 procedures, as required by California Code of Regulations, Title 16, section 2032.3(a)(9).

3 C. Documentation regarding the results of blood tests prior to performing the dental
4 procedures on May 29, 2015 and December 5, 2016, as required by California Code of
5 Regulations, Title 16, section 2032.3(a)(7).

6 D. Documentation as to the dosages of the medications administered and/or the dosage
7 of medications administered for anesthesia, as required by the California Code of Regulations,
8 Title 16, section 2032.3(a)(9).

9 E. Documentation regarding which tooth was extracted on May 29, 2015, as required by
10 California Code of Regulations, Title 16, section 2032.3(a)(9).

11 The facts in support of this cause for discipline are set forth above in paragraphs 59 to 61.

12 **STATEMENT OF FACTS REGARDING “GROVER”**

13 67. On December 19, 2016, Belinda C. took her canine Grover to AVAH for a wart on
14 the side of his mouth. There was no documentation of a discussion with the owner regarding the
15 need for surgical excision of the papilloma lesion and/or that Respondent met with the owner
16 prior to the surgery.

17 68. Respondent placed Grover under anesthesia for removal of the wart. The surgery was
18 recorded on a Medical History Form. The documentation failed to include the following:

- 19 A. Initials and/or signature that Respondent performed the surgery.
20 B. Documentation that a physical exam was performed prior to the surgery.
21 C. Documentation of the dose and/or route of medications used for anesthesia.
22 D. Documentation that any medications were prescribed for post-operative pain.

23 69. Postoperatively, without indication, Respondent administered two different
24 antibiotics, Baytril and PPG. The record ended with “Rx?”

25 ///

26 ///

27 ///

28 ///

1 **TWENTY-THIRD CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct – Failure to Establish a Veterinarian Client Relationship)**

3 70. Respondent is subject to discipline for unprofessional conduct pursuant to Code
4 section 4883(c) and California Code of Regulations, Title 16, section 2032.1 and 2032.15 in that
5 he failed to document that he had an established veterinarian-client relationship with Grover
6 owner's prior to performing the surgical procedures. The facts in support of this cause for
7 discipline are set forth above in paragraphs 67.

8 **TWENTY-FOURTH CAUSE FOR DISCIPLINE**

9 **(Unprofessional Conduct – Failure to Perform and/or Document**
10 **Physical Examination Prior to Surgery)**

11 71. Respondent is subject to discipline for unprofessional conduct pursuant to Code
12 section 4883(c) and California Code of Regulations, Title 16, section 2032.4(b)(1), in that he
13 failed to perform and/or document a physical examination on Grover prior to the surgical
14 procedure on December 19, 2016. The facts in support of this cause for discipline are set forth
15 above in paragraphs 68.

16 **TWENTY-FIFTH CAUSE FOR DISCIPLINE**

17 **(Negligence -- Medication Administration)**

18 72. Respondent is subject to discipline for negligence pursuant to Code section 4883(i),
19 based on his administration, without indication, two different antibiotics that were given to
20 Grover's on December 19, 2016. The facts in support of this cause for discipline are set forth
21 above in paragraphs 69.

22 **TWENTY-SIXTH CAUSE FOR DISCIPLINE**

23 **(Unprofessional Conduct – Failure to Provide Humane Treatment)**

24 73. Respondent is subject to discipline for unprofessional conduct pursuant to California
25 Code of Regulations, Title 16, section 2032.05, in that he failed to provide humane treatment to
26 Grover with pain medication after his surgical procedure. The facts in support of this cause for
27 discipline are set forth above in paragraph 68.

28 ///

1 **TWENTY-SEVENTH CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct – Record Keeping Violations)**

3 74. Respondent is subject to discipline for unprofessional conduct pursuant to Code
4 section 4883, subdivisions (c) and (i), and California Code of Regulations, Title 16, section
5 2032.3, in that the records for Grover failed to include the following:

6 A. Respondent's initials or signature as the veterinarian performing the surgery on
7 December 19, 2016, as required by California Code of Regulations, Title 16, section 2032.3,
8 subdivisions (a)(1) and (a)(9).

9 B. Documentation that a physical examination was performed prior to the surgery on
10 December 19, 2016, as required by California Code of Regulations, Title 16, section 2032.3(a)(9).

11 C. Documentation as to the dosages of the medications administered for anesthesia, as
12 required by the California Code of Regulations, Title 16, section 2032.3(a)(9).

13 The facts in support of this cause for discipline are set forth above in paragraph 68.

14 **STATEMENT OF FACTS REGARDING "KALA"**

15 75. On January 30, 2017, 4-5-month old canine Kala owned by Copper's Dream
16 presented to AVAH for a spay procedure. Respondent performed the spay procedure.

17 76. The only documentation regarding the spay procedure was handwritten on a
18 document entitled Ovariohysterectomy. The documentation failed to include the following:

19 A. Initials and/or signature that Respondent performed the surgery.

20 B. Documentation that a physical exam was performed prior to the surgery.

21 C. Documentation of the dose of Ketamine⁸ given as an induction agent.

22 D. Documentation regarding the dose of Meloxicam⁹ given post-operatively.

23 77. Post-operatively, without indication, Respondent administered two different
24 antibiotics: Baytril and PPG.

25 ///

26 ///

27 ⁸ Ketamine is an anesthetic used to induce a loss of consciousness for surgical induction.

28 ⁹ Meloxicam is a nonsteroidal anti-inflammatory drug.

1 **TWENTY-EIGHTH CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct – Failure to Perform and/or Document**
3 **Physical Examination Prior to Surgery)**

4 78. Respondent is subject to discipline for unprofessional conduct pursuant to Code
5 section 4883(c) and California Code of Regulations, Title 16, section 2032.4(b)(1), in that he
6 failed to perform and/or document a physical examination on Kala prior to the spay procedure
7 on January 30, 2017. The facts in support of this cause for discipline are set forth above in
8 paragraphs 75 and 76.

9 **TWENTY-NINTH CAUSE FOR DISCIPLINE**

10 **(Negligence -- Medication Administration)**

11 79. Respondent is subject to discipline for negligence pursuant to Code section 4883(i),
12 based on his administration, without indication, of two different antibiotics that were given to
13 Kala on January 30, 2017. The facts in support of this cause for discipline are set forth above in
14 paragraph 77.

15 **THIRTIETH CAUSE FOR DISCIPLINE**

16 **(Unprofessional Conduct – Record Keeping Violations)**

17 80. Respondent is subject to discipline for unprofessional conduct pursuant to Code
18 section 4883, subdivisions (c) and (i), and California Code of Regulations, Title 16, section
19 2032.3, in that the records for Kala failed to include the following:

20 A. Respondent's initials or signature as the veterinarian performing the surgery on
21 January 30, 2017, as required by California Code of Regulations, Title 16, section 2032.3,
22 subdivisions (a)(1) and (a)(9).

23 B. Documentation that a physical examination was performed prior to the surgery on
24 January 30, 2017, as required by California Code of Regulations, Title 16, section 2032.3(a)(9).

25 C. Documentation as to the dosages of the medications administered for anesthesia, as
26 required by the California Code of Regulations, Title 16, section 2032.3(a)(9).

27 The facts in support of this cause for discipline are set forth above in paragraph 76.

28 ///

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

- 2
- 3
- 4
- 5
- 6

7

8

9

10

11

12
13
14
15
16

17

18

19
20
21

22
23
24

25

26

27

28

1 D. The dosage and/or frequency of use for the prescribed antibiotic Clavamox.

2 The facts in support of this cause for discipline are set forth above in paragraph 82 to 84.

3 **THIRTY-SECOND CAUSE FOR DISCIPLINE**

4 **(Negligence -- Medication Administration)**

5 86. Respondent is subject to discipline for negligence pursuant to Code section 4883(i),
6 based on his administration, without indication, of Dexamethasone. The facts in support of this
7 cause for discipline are set forth above in paragraph 83.

8 **STATEMENT OF FACTS REGARDING "BLUE COLLAR"**

9 87. On February 16, 2017, 10-week old canine Blue Collar owned by Copper's Dream
10 presented to AVAH for a spay procedure. Respondent performed the spay procedure.

11 88. The only documentation regarding the spay procedure was on a single handwritten
12 Medical History form. The documentation failed to include the following:

- 13 A. Initials and/or signature that Respondent performed the surgery.
14 B. Documentation of a physical examination prior to surgery.
15 C. Documentation that pain medications were given before, during or after the
16 procedure.

17 89. Respondent documented that he administered a rabies vaccination to Blue Collar.

18 **THIRTY-THIRD CAUSE FOR DISCIPLINE**

19 **(Unprofessional Conduct -- Failure to Perform and/or Document**

20 **Physical Examination Prior to Surgery)**

21 90. Respondent is subject to discipline for unprofessional conduct pursuant to Code
22 section 4883(c) and California Code of Regulations, Title 16, section 2032.4(b)(1), in that he
23 failed to perform and/or document a physical examination on Blue Collar prior to the spay
24 procedure on February 16, 2017. The facts in support of this cause for discipline are set forth
25 above in paragraphs 87 and 88.

26 ///

27 ///

28 ///

1 **THIRTY-FOURTH CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct – Record Keeping Violations)**

3 91. Respondent is subject to discipline for unprofessional conduct pursuant to Code
4 section 4883, subdivisions (c) and (i), and California Code of Regulations, Title 16, section
5 2032.3, in that the records for Blue Collar failed to include the following:

6 A. Respondent's initials or signature as the veterinarian performing the surgery on
7 February 16, 2017, as required by California Code of Regulations, Title 16, section 2032.3,
8 subdivisions (a)(1) and (a)(9).

9 B. Documentation that a physical examination was performed prior to the surgery on
10 February 16, 2017, as required by California Code of Regulations, Title 16, section 2032.3(a)(9).

11 The facts in support of this cause for discipline are set forth above in paragraph 88.

12 **THIRTY-FIFTH CAUSE FOR DISCIPLINE**

13 **(Unprofessional Conduct – Failure to Provide Humane Treatment)**

14 92. Respondent is subject to discipline for unprofessional conduct pursuant to California
15 Code of Regulations, Title 16, section 2032.05, in that he failed to provide humane treatment to
16 Blue Collar as no pain medications were documented as administered prior to, during or after the
17 spay procedure. The facts in support of this cause for discipline are set forth above in
18 paragraph 88.

19 **STATEMENT OF FACTS REGARDING "RED COLLAR"**

20 93. On February 16, 2017, 10-week old canine Red Collar owned by Copper's Dream
21 presented to Alta View for a spay procedure. Respondent performed the spay procedure.

22 94. The only documentation regarding the spay procedure was on a single handwritten
23 Medical History form. The documentation failed to include the following:

24 A. Initials and/or signature that Respondent performed the surgery.

25 B. Documentation of a physical examination prior to surgery.

26 C. Documentation that pain medications were given before, during or after the
27 procedure.

28 ///

1 **THIRTY-SIXTH CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct – Failure to Perform and/or Document**
3 **Physical Examination Prior to Surgery)**

4 95. Respondent is subject to discipline for unprofessional conduct pursuant to Code
5 section 4883(c) and California Code of Regulations, Title 16, section 2032.4(b)(1), in that he
6 failed to perform and/or document a physical examination on Red Collar prior to the spay
7 procedure on February 16, 2017. The facts in support of this cause for discipline are set forth
8 above in paragraphs 93 and 94.

9 **THIRTY-SEVENTH CAUSE FOR DISCIPLINE**

10 **(Unprofessional Conduct – Record Keeping Violations)**

11 96. Respondent is subject to discipline for unprofessional conduct pursuant to Code
12 section 4883, subdivisions (c) and (i), and California Code of Regulations, Title 16, section
13 2032.3, in that the records for Red Collar failed to include the following:

14 A. Respondent's initials or signature as the veterinarian performing the surgery on
15 February 16, 2017, as required by California Code of Regulations, Title 16, section 2032.3,
16 subdivisions (a)(1) and (a)(9).

17 B. Documentation that a physical examination was performed prior to the surgery on
18 February 16, 2017, as required by California Code of Regulations, Title 16, section 2032.3(a)(9).

19 The facts in support of this cause for discipline are set forth above in paragraph 94.

20 **THIRTY-EIGHTH CAUSE FOR DISCIPLINE**

21 **(Unprofessional Conduct – Failure to Provide Humane Treatment)**

22 97. Respondent is subject to discipline for unprofessional conduct pursuant to California
23 Code of Regulations, Title 16, section 2032.05, in that he failed to provide humane treatment to
24 Red Collar as no pain medications were documented as administered prior to, during or after the
25 spay procedure. The facts in support of this cause for discipline are set forth above in paragraph
26 94.

27 ///

28 ///

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

99. The only documentation regarding the spay procedure was handwritten on a document entitled Medical History. The documentation failed to include the following:

- THIRTY-NINTH CAUSE FOR DISCIPLINE**
(Unprofessional Conduct – Failure to Perform and/or Document
Physical Examination Prior to Surgery)

FORTIETH CAUSE FOR DISCIPLINE

(Unprofessional Conduct – Record Keeping Violations)

A. Respondent's initials or signature as the veterinarian performing the surgery on February 16, 2017, as required by California Code of Regulations, Title 16, section 2032.3, subdivisions (a)(1) and (a)(9).

- The facts in support of this cause for discipline are set forth above in paragraph 99.

1 **FORTY-FIRST CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct – Failure to Provide Humane Treatment)**

3 102. Respondent is subject to discipline for unprofessional conduct pursuant to California
4 Code of Regulations, Title 16, section 2032.05, in that he failed to provide humane treatment to
5 Kiko as no pain medications were documented as administered prior to, during or after the spay
6 procedure. The facts in support of this cause for discipline are set forth above in paragraph 99.

7 **STATEMENT OF FACTS REGARDING “CASSIDY”**

8 103. On February 14, 2017, owner H. took her 16-week-old canine Cassidy to AVAH for a
9 neuter procedure. There was no documentation of the owner’s full name and address. The
10 information regarding Cassidy did not include his breed, species and/or color. There was no
11 documentation of a discussion with the owner regarding the neuter procedure and/or that
12 Respondent met with the owner prior to the surgery.

13 104. The only documentation regarding the spay procedure was handwritten on a
14 document entitled Medical History. The record failed to include the following:

- 15 A. Initials and/or signature that Respondent performed the surgery.
16 B. Documentation of a physical examination prior to surgery.
17 C. Documentation that pain medications were given before, during or after the
18 procedure.
19 D. Reference to administering the antibiotic Baytril, without indication.
20 E. Reference to an unknown injection of a medication with the letter “p” with the dosage
21 of 0.7 cc/sc (subcutaneous).

22 **FORTY-SECOND CAUSE FOR DISCIPLINE**

23 **(Unprofessional Conduct – Failure to Establish a Veterinarian Client Relationship)**

24 105. Respondent is subject to discipline for unprofessional conduct pursuant to Code
25 section 4883(c) and California Code of Regulations, Title 16, section 2032.1 and 2032.15 in that
26 he failed to document that he had an established veterinarian-client relationship with Cassidy’s
27 owner prior to performing the neuter procedure. The facts in support of this cause for discipline
28 are set forth above in paragraphs 103 and 104.

1 **FORTY-THIRD CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct – Failure to Perform and/or Document**

3 **Physical Examination Prior to Surgery)**

4 106. Respondent is subject to discipline for unprofessional conduct pursuant to Code
5 section 4883(c) and California Code of Regulations, Title 16, section 2032.4(b)(1), in that he
6 failed to perform and/or document a physical examination on Cassidy prior to the surgical
7 procedure on February 14, 2017. The facts in support of this cause for discipline are set forth
8 above in paragraph 104.

9 **FORTY-FOURTH CAUSE FOR DISCIPLINE**

10 **(Negligence -- Medication Administration)**

11 107. Respondent is subject to discipline for negligence pursuant to Code section 4883(i),
12 based on his administration, without indication, of Baytril during the neuter procedure. The facts
13 in support of this cause for discipline are set forth above in paragraphs 104.

14 **FORTY-FIFTH CAUSE FOR DISCIPLINE**

15 **(Unprofessional Conduct – Failure to Provide Humane Treatment)**

16 108. Respondent is subject to discipline for unprofessional conduct pursuant to California
17 Code of Regulations, Title 16, section 2032.05, in that he failed to provide humane treatment to
18 Cassidy with pain medication prior to, during or after his neuter procedure. The facts in support
19 of this cause for discipline are set forth above in paragraph 104.

20 **FORTY-SIXTH CAUSE FOR DISCIPLINE**

21 **(Unprofessional Conduct – Record Keeping Violations)**

22 109. Respondent is subject to discipline for unprofessional conduct pursuant to Code
23 section 4883, subdivisions (c) and (i), and California Code of Regulations, Title 16, section
24 2032.3, in that the records failed to include the following:

25 A. Respondent's initials or signature as the veterinarian performing the surgery on
26 February 14, 2017, as required by California Code of Regulations, Title 16, section 2032.3,
27 subdivisions (a)(1) and (a)(9).

28 ///

1 B. Documentation that a physical examination was performed prior to the surgery on
2 February 14, 2017, as required by California Code of Regulations, Title 16, section 2032.3(a)(9).

3 C. Documentation as to the dosages of the medications administered for anesthesia, as
4 required by the California Code of Regulations, Title 16, section 2032.3(a)(9).

5 The facts in support of this cause for discipline are set forth above in paragraph 103.

6 **STATEMENT OF FACTS REGARDING "NANUKIK"**

7 110. On August 25, 2015, Pearl P. to her 5-week old female canine Nanukik to AVAH.
8 Respondent was the attending veterinarian. He noted a normal physical examination and without
9 indication prescribed a nutritional supplement Nutrical. The owner was sent home with a fecal
10 container but there are no records that a fecal exam was ever done.

11 111. On September 15, 2015, Nanukik presented for her first set of vaccinations. No
12 physical examination was documented. Respondent noted "done with Pancur" but there is no
13 indication that this medication was prescribed.

14 112. On October 6, 2015, Nanukik presented for her second set of vaccinations. No
15 physical examination was documented. The de-worming box is checked off on the examination
16 sheet, but there is no indication that any medications were prescribed.

17 113. On October 27, 2015, Nanukik presented for the third set of vaccinations. No
18 physical examination was documented.

19 114. On February 8, 2016, Nanukik presented with diarrhea lasting for 2 weeks. A very
20 limited examination was documented with omission of reference to abdominal palpation.

21 115. On March 15, 2016, Nanukik presented for a spay procedure. The owner asked for
22 pain medications to be dispensed. The only documentation regarding the spay procedure was
23 handwritten on a document entitled Medical History. The record failed to include the following:

24 A. Initials and/or signature that Respondent performed the surgery.

25 B. Documentation that pain medications were given before, during or after the
26 procedure.

27 ///

28 ///

1 **FORTY-SEVENTH CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct – Record Keeping Violations)**

3 116. Respondent is subject to discipline for unprofessional conduct pursuant to Code
4 section 4883, subdivisions (c) and (i), and California Code of Regulations, Title 16, section
5 2032.3, in that the records failed to include the following:

6 A. Respondent's initials or signature as the veterinarian performing the surgery on
7 March 15, 2016, as required by California Code of Regulations, Title 16, section 2032.3,
8 subdivisions (a)(1) and (a)(9).

9 B. Documentation of physical examinations when Nanukik presented for vaccinations
10 and when she presented with diarrhea as required by California Code of Regulations, Title 16,
11 section 2032.3(a)(6).

12 C. Documentation of treatment plans as required by California Code of Regulations,
13 Title 16, section 2032.3(a)(8).

14 D. Documentation of the dosage of medications prescribed, as required by California
15 Code of Regulations, Title 16, section 2032.3(a)(12).

16 The facts in support of this cause for discipline are set forth above in paragraphs 110 to 115.

17 **FORTY-EIGHTH CAUSE FOR DISCIPLINE**

18 **(Unprofessional Conduct – Failure to Provide Humane Treatment)**

19 117. Respondent is subject to discipline for unprofessional conduct pursuant to California
20 Code of Regulations, Title 16, section 2032.05, in that he failed to provide humane treatment to
21 Nanukik with pain medication prior to, during or after his neuter procedure. The facts in support
22 of this cause for discipline are set forth above in paragraph 115.

23 **FORTY-NINTH CAUSE FOR DISCIPLINE**

24 **(Unprofessional Conduct – Failure to Maintain AVAH Premises Registration)**

25 118. Respondent is subject to discipline for unprofessional conduct pursuant to Code
26 section 4883(c) in that while working at AVAH, he failed to ensure that the veterinary facility
27 was registered as required by Code section 4853. The facts in support of this cause for discipline
28 are set forth above in paragraph 3.

1 **FIFTIETH CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct – Failure to Register Mobile Veterinary Clinic)**

3 119. Respondent is subject to discipline for unprofessional conduct pursuant to Code
4 section 4883(c) in that he operated 4Paws Mobile Veterinary Services that was not registered
5 with the Board and/or not affiliated with AVAH. The facts in support of this cause for discipline
6 are set forth above in paragraphs 3 and 4.

7 **PRAYER**

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

10 1. Revoking or suspending Veterinarian License Number VET 8662, issued to Michael
11 J. Sterns;

12 2. Revoking or suspending Premises Registration Number HSP 4645, issued to Alta
13 View Animal Hospital;

14 3. Revoking or suspending Premises Registration Number HSP 38355, issued to Alta
15 View Animal Hospital;

16 4. Revoking or suspending Premises Registration Number HSP 38157, issued to 4Paws
17 Mobile Veterinary Services;

18 5. Ordering Michael J. Sterns to pay the Veterinary Medical Board the reasonable costs
19 of the investigation and enforcement of this case, pursuant to Business and Professions Code
20 section 125.3; and,

21 6. Taking such other and further action as deemed necessary and proper.
22

23 DATED: April 16, 2021

SIGNATURE ON FILE

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

27 SF201820021
28

EXHIBIT 4



BUSINESS CONSUMER SERVICES AND HOUSING AGENCY • GAVIN NEWSOM GOVERNOR
 DEPARTMENT OF CONSUMER AFFAIRS • VETERINARY MEDICAL BOARD
 1747 North Market Blvd., Suite 230, Sacramento, CA 95834-2978
 P (916) 515-5220 | Toll-Free (866) 229-0170 | www.vmb.ca.gov

RECEIVED

OCT 16 2023

VMBIRVT



PETITION FOR REINSTATEMENT OR MODIFICATION OF PENALTY

INSTRUCTIONS: Please type or print neatly. All blanks must be completed; if not applicable enter N/A. If more space is needed attach additional sheets. Attached to this application should be a "Narrative Statement" and two original verified recommendations from a veterinarian licensed by the Board who has personal knowledge of activities since the disciplinary action was imposed.

TYPE OF PETITION [Reference Business and Professions Code section 4887]

☐ Reinstatement of Revoked/Surrendered License or Registration ☐ Modification of Probation ☒ Termination of Probation

NOTE: A Petition for Modification and/or Termination of Probation can be filed together. If you are requesting Modification, you must specify in your "Narrative Statement" the term(s) and condition(s) of your probation that you want reduced or modified and provide an explanation. Please check all boxes above that apply.

PERSONAL INFORMATION

NAME: First Middle Last
 Michael Jay Sterns

Other name(s) licensed under, if any:

HOME ADDRESS: Number & Street City State Zip
 280 Shelford Avenue San Carlos C A

HOME TELEPHONE NUMBER WORK TELEPHONE NUMBER CELL NUMBER
 () () ()

E-mail address: CA License or Registration Number
 VET 8662

Are you licensed by any other state(s) or country(ies) (please include license number(s), issue date(s), and status of license(s)):
 NO

ATTORNEY INFORMATION (If Applicable)

Will you be represented by an attorney? ☐ No ☒ Yes (If "Yes," please provide the following information)

NAME: Michael A Firestone, MBA, JD

ADDRESS: 1700 S. El Camino Real, Suite 408

PHONE: (650) 212-4900

DISCIPLINARY INFORMATION

Provide a brief explanation in your "Narrative Statement" as to the cause for the disciplinary action (e.g., negligence or incompetence, self use of drugs or alcohol, extreme departures from sanitary conditions, conviction of a crime, etc.)

Have you ever had your license revoked, suspended, voluntarily surrendered, denied, or placed on probation in any other state or country? ☒ No ☐ Yes

(If Yes, give a brief cause for administrative action or license denial in your "Narrative Statement" section, including dates and discipline ordered (e.g., 5 years probation.)

VETERINARIAN/REGISTERED TECHNICIAN BACKGROUND

Total number of years in veterinary practice:

CONTINUING EDUCATION (List continuing education completed since the date of the disciplinary action)

Statement from Jeffrey Weiler, Probation Monitor, is attached stating that all requirements have been completed as per probation requirements.

Copies of all CE Certificates Attached

CURRENT OCCUPATION OTHER THAN VETERINARIAN OR REGISTERED VET TECHNICIAN

(Answer only if currently not practicing as a Veterinarian or Registered Vet Technician)

List employer, address, e-mail address, phone number, job title, and duties:

N/A

EMPLOYMENT HISTORY (list for the past 5 years only)

Provide the employer's name, address, phone number, job title and dates of employment:

CV Attached

REHABILITATION

Describe any rehabilitative or corrective measures you have taken since your license/registration was disciplined. List dates, nature of programs or courses, and current status. You may include any community service or volunteer work.

Please see attached narrative.

CURRENT COMPLIANCE

Since the effective date of your last Veterinary Medical Board disciplinary action have you:

- | | | |
|---|------------------------------|--|
| 1. Been placed on criminal probation or parole? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 2. Been charged in any pending criminal action by any state, local or federal agency or court? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 3. Been convicted of any criminal offense? (A conviction includes a no contest plea; disregard traffic offenses with a \$100 fine or less.) | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 4. Been charged or disciplined by any other veterinary board? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 5. Surrendered your license to any other veterinary board? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 6. Had your licensee manager's premise permit disciplined? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 7. Had any civil malpractice claims filed against you of \$10,000 or more? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 8. Become addicted to the use of narcotics or controlled substances? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 9. Become addicted to or received treatment for the use of alcohol? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 10. Been hospitalized for alcohol or drug problems or for mental illness? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |

NOTE: If your answer is "Yes" to **any** of the above questions, please explain in the "Narrative Statement."

COST RECOVERY

Was cost recovery ordered? ☒ Yes ☐ No If yes, what is the remaining balance? _____

When is payment anticipated? _____

DECLARATION

Executed on October 11 20\$23, at San Carlos, C A
(City) (State)

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that all statements and documents attached in support of this petition are true and correct.

Michael J. Sterns, DVM

Petitioner (print name)


Signature

The information in this document is being requested by the Veterinary Medical Board (Board) pursuant to Business and Professions Code section 4887. In carrying out its licensing or disciplinary responsibilities, the Board requires this information to make a determination on your petition for reinstatement or modification of penalty. You have a right to access the Board's records containing your personal information as defined in Civil Code section 1798.3. The Custodian of Records is the Executive Officer at the address shown on the first page.

EXHIBIT 5

October 8, 2023

To:

Veterinary Medical Board
Attention: Formal Discipline Unit
1747 N. Market Blvd., Suite 230
Sacramento, CA 95834-2978

From:

Michael Sterns, DVM
Owner/Veterinarian
4Paws Mobile Veterinary Services
[REDACTED]
[REDACTED]
[REDACTED]

Re: Petition for Penalty Relief, Termination of Probation

To the Honorable Board Members of the Veterinary Medical Board of California:

I respectfully submit the following petition for penalty relief/termination of probation as I believe I have fully remediated any delinquencies, fully satisfied all conditions of probation, and have demonstrated professional and veterinary medical competence in every area.

During my 39 years as a licensed veterinarian, I have never had a complaint filed against me by any client with whom I established a primary VCPR. The underlying disciplinary action that was filed against my veterinary license by the VMB on February 12, 2020, related to my work as a back-room veterinarian for the time period of 2014 through 2016, when I worked at Alta View Animal Hospital ("AVAH"). I primarily performed spays and neuters for Copper's Dream, a local not for profit dog rescue organization, that still to this day brings all its cases to AVAH from which I resigned on December 31, 2016. I had also assumed the position as the supervising veterinarian for Tejpaal Ghumman, DVM, who on April 29, 2014, was placed on a four (4) year term of probation with the VMB.¹

There were multiple allegations made in the Second Amended Accusation against my veterinary medical license by the VMB. The main concerns raised by the VMB involved allegations of unprofessional conduct and negligence related to the treatment I had provided to several canine patients and also related to an issue related to assisting my employer present what turned out to be a "Prohibited Agreement" that had been drafted by AVAH's attorney.

¹ In The Matter of the Accusation Against: Tejpaal Ghumman, Case No. AV 2013 29, the Veterinary Medical Board placed Ghumman on four (4) years of probation. A condition of probation was that Ghumman have a supervising veterinarian.

The Second Amended Accusation made multiple allegations, including: Unprofessional Conduct for: Seeking a Prohibited Settlement; Failure to Establish a Veterinarian Client Relationship; Record Keeping Violations; Failure to Include Minimal Documentation; Failure to Perform and/or Document Physical Examination Prior to Surgery for Surgical Procedure); Administration of Rabies Vaccination; Failure to Perform and/or Document; Administration of Medication Without Owner's Consent; Failure to Provide Humane Treatment; and Negligence for: Medication Administration.

In order to demonstrate my taking responsibility for my culpable actions, I reached a stipulated settlement with the VMB. In that stipulation, I admitted the truth of each and every charge and allegation in Second Amended Accusation No. 4602017001022, except I did not admit responsibility to several of the alleged Causes for Discipline: Second, Sixth, Seventh, Thirteenth, Eighteenth, Twenty- Third, Forty-Second, and Forty-Ninth.

I fully acknowledge that my medical record documentation during the time-period under consideration could have been improved upon. I've done all I can to prove my willingness to improve my record keeping skills, and I have so far completed multiple continuing education courses that support my rehabilitation and my ability to provide safe and competent care to the public.

I also admit that I misunderstood the legal requirements for mobile clinic registrations, but those issues have been rectified and are unlikely to reoccur.

Regarding the issue of an illegal settlement agreement, I would like to reiterate that I had no specific knowledge of the content of the settlement agreement drafted by Alta View's attorney, which turned out to be a Prohibited Agreement.

There are several reasons that justify early termination of my VMB license probation. First and foremost, I have proven my rehabilitation; the factors that were at play in 2014-2016 are simply not relevant to my current veterinary practice. Since establishing my own private veterinary practice on January 1, 2017, I have received greater than 500 Five Star Reviews (from clients) on Google, Yelp and Facebook.

Pertinent background

I want to share some pertinent details regarding my background and training that also help put into perspective the prior issues raised in the underlying disciplinary matter, especially in regard to concerns about my record keeping.

I graduated from the University of California, Davis, School of Veterinary Medicine ("UC Davis Veterinary School") and received my CA veterinary license (VET8662) in 1984. For the first five years after veterinary school, I practiced large animal veterinary medicine, exclusively treating horses and other livestock. I later resigned from this position as Associate Veterinarian at Peninsula Equine to pursue a career in business, and enrolled full-time in the MBA program at the Haas School of Business at the University of California, Berkeley.

After earning my MBA in 1990, I then entered the corporate world in the human pharmaceutical industry in 1991. I joined ALZA Corporation as director of business development for three and half years, and then over the next 20 years, I helped to establish, grow, and finance multiple bio-pharma and medical device companies.

In 2012, after spending greater than 20 years away from veterinary medicine, I left the corporate world and reinstated my veterinary license with the goal of transitioning back into clinical practice.

My first veterinary position after taking the nearly two-decade hiatus from active veterinary practice was as a contract veterinarian working for VIP Petcare. VIP Petcare operated mobile vaccine clinics inside pet supply stores. This work involved a negligible amount of record keeping.

In 2013, I became a Relief Veterinarian (*locum tenens*) working as a contractor at several different small animal practices, all of which used paper medical records.

In the third quarter of 2013, one of my *locums* contracts was with AVAH, in Mountain View, California.

On January 1, 2014, I became a W-2 employee of Alta View. It was my first small animal veterinary position and first full-time veterinary position since leaving large animal veterinary practice in 1989.

As an employee of AVAH, I had very limited direct contact with Alta View's clients. As a W-2 employee hired to perform medical procedures, I had no authority to make changes to Alta View's existing practice protocols nor business procedures. I had access to the clinic's paper records and lab reports. I did not have access to, nor did I utilize, the clinic's outdated EMR system to create my own treatment records. Instead, I utilized handwritten records and paper surgical forms that I created to improve upon existing forms.

I was not assigned to complete patient intake exams. Rather, care of patients began after the admitting veterinarian, Dr. Tejpal Ghumman, had established the VCPR and had set forth and documented the treatment plan for each patient. Dr. Ghumman would admit each patient, complete the intake forms and record sheets, and assign me to perform the treatment. By the time I became involved in the care of these animals, they had already been admitted as an AVAH patient and had been placed in a cage in the treatment area awaiting medical treatment or surgery.

In February of 2014, after only one month as a W-2 employee at Alta View, I was nominated and approved by the VMB as the supervising veterinarian for Dr. Tejpal Ghumman's license probation term. No one at the VMB provided me with any guidelines, standards, or information about what this supervisory position entailed, other than an expectation that I was to review a small sample of Dr. Ghumman's medical records on a monthly basis, which I did for several years with no guidance, nor feedback, from the VMB.

Rehabilitation efforts

I have taken a proactive approach to my rehabilitative efforts in order to address the allegations raised in the Second Amended Accusation against my veterinary license which led to my veterinary license being placed on probation and have fully complied with all terms and conditions of the stipulated settlement decision and am fully compliant with my license probation.

Record Keeping Issue

The majority of the concerns raised by the Board in the underlying matter involved record keeping practices. I fully acknowledge that my medical record keeping was of insufficient quality during this time period, although it did conform to AVAH's standards at the time.

Simply put, the record keeping issues that were under consideration by the VMB pertained to circumstances which are no longer relevant. All of the cases under consideration involved my use of handwritten charts and only occurred during the time period I worked at Alta View and involved animals for whom I was not the animal's primary veterinarian. When launching my own practice on January 1, 2017, I chose Neo from IDEXX Laboratories, a state of the art, cloud based EMR that I still use today to generate all medical records and forms.

I am hopeful that the VMB can appreciate that I had returned to veterinary practice after 23 years' absence. During that time, record keeping requirements and methodology had evolved. Since I was not involved in veterinary clinical practice for such a long period of time, I was not attuned to these changes. Although my medical record keeping skills certainly were in need of improvement, my deficiencies did not result in harm to any animal patients under my care at Alta View. I always did my best to provide safe and humane care to the patients assigned to me.

I have taken the allegations in Complainant's Second Amended Accusation seriously, and completed continuing education in order to demonstrate to the Board that I am qualified to practice with an unrestricted license. I have demonstrated my rehabilitation and corrected deficiencies in my record keeping practices by completing an 8-hour continuing education course in Medical Record Keeping. (Total Cost to me to date = \$900). Since completing the course, I have implemented and integrated the concepts and information that I learned and have ensured that my notes comply with the standard of care. I have fulfilled all other mandated CE requirements for antibiotic usage, and spay and neuter issues.

In 2021 for my current practice, 4Paws Mobile Veterinary Services, I established an App and cloud-based advice portal to track the effectiveness of treatment plans, wound healing, and surgical recovery. Currently, greater than 250 clients post non-urgent medical questions and upload pictures and videos for me to view and to comment on in a time-stamped format.

Ethics Issue – Illegal Agreement

My role in regard to the Illegal Settlement Agreement was to invite the client into clinic to talk about resolving their complaint. I had never spoken to the client previously, and had never examined the dog, nor participated in its treatment. I was given a written agreement from Alta View's attorney to hand to the client. My role was to take a piece of paper from the practice owner to hand to the client. The Alta View attorney submitted an Affidavit to the Court, taking full responsibility for the Illegal Agreement. I did not write, read, edit, nor comment on the actual agreement prepared by the practice's attorney.

Nonetheless, I accept responsibility for my role and have tried to use this as a learning opportunity and have completed 8 hours of Ethics CE as required. (Total Cost to me to date = \$700). I assure the VMB that I would never utilize any illegal agreement in my own practice.

Practice Monitor

I have also fulfilled all monitoring requirements, including paying another veterinarian \$9,600 per year to evaluate my record keeping. (Total Cost to me to date = \$21,600). In fact, for the last 2 years, I have been under constant practice monitoring during my probation term as I have been required to have in place a Practice Monitor. Dr. Donald Jones has acted as my VMB approved Record Monitor. Dr. Jones has always found my record keeping to be significantly improved and in compliance with the standard of care. Dr. Jones found my notes to be thorough, evidence-based, and have given me positive feedback that my records are "excellent."

Since establishing 4Paws Mobile Veterinary Services in 2017, my private mobile veterinary practice, I have utilized a cloud-based electronic medical record system (EMR) (Neo, IDEXX Laboratories). There have been no issues nor owner complaints regarding any of my care through 4Paws. Since January 2017, I have provided humane and high-quality treatment to dogs and cats for approximately 1,500 active clients and 2,500 of their pets, and have performed approximately 150 spays and neuters without incident nor complaints being filed.

Further license probation is not necessary, as I am committed to maintaining these high standards for my medical documentation.

Premise Permit Issue

I have been a mobile veterinarian since January 1, 2017. At the time, the regulations for Premise Permits were difficult for me to interpret, and I had assumed that I could operate out of the clinic address where my DEA License and Veterinary License were located. My supplies for my new practice were also delivered to this address. When a representative of the VMB called to inform me that the practice must own the vehicle to use the clinic's Premise Permit, I immediately applied for, and was issued, my own Premise Permit. It has been paid up and in force since issued. I assure the VMB that this is not something that is likely to ever reoccur.

In conclusion, although this has been a very challenging time for me personally and professionally to be placed on probation, and I did not feel I was able to afford to adequately challenge the accusations/allegations made against me, I took the allegations very seriously and used this as an opportunity to grow as a veterinarian and as a person.

I feel that I have met every condition of probation and that any and all concerns raised during this process by the Complainant have been addressed in turn and in detail and that I am practicing safe, competent and evidence-based medicine for the benefit of those that I have the privilege to serve.

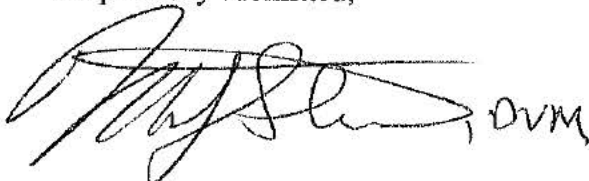
I have fully paid my \$35,000 fine, and am current on all VMB monitoring costs (\$2,400 for my DCA Probation Monitor, Jeffrey Weiler). I have completed an additional 24 hours of additional mandated CE beyond the Ethics and Record Keeping CE (total cost to me = \$875).

Therefore, I believe that further license probation is no longer necessary as every observation and evaluation of me has found me to be competent and a safe clinician. The probation process is very time consuming and expensive, and ending my probation early will free me up in many ways to better serve my patients and my community. I will be able to train veterinary student interns to deliver quality veterinary care in the mobile setting, therefore allowing me to create a succession plan for my eventual retirement. I hope to be able to pass the baton to someone who will continue my high level of customer service to my valued clients and their pets.

During the COVID-19 Pandemic many brick and mortar veterinary clinics shut their doors, while I maintained a full schedule of house calls to serve clients who required veterinary care. My client base increased by 50 new clients every month due to these clinic closures. I was also one of a few Category I USDA-accredited veterinarians available to help many people in need of documentation to return to their home countries during the Pandemic.

I thank you for the time spent considering this petition for penalty relief/early termination of probation and I look forward to answering any questions you might have.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael Sterns, DVM". The signature is fluid and cursive, with the "DVM" written in a slightly different, more formal script at the end.

Michael Sterns, DVM
Owner/Veterinarian
4Paws Mobile Veterinary Services

A black rectangular redaction box covering contact information, likely a phone number and address.

EXHIBIT 6

Michael J. Sterns, DVM

280 Shelford Avenue, San Carlos, CA 94070

Professional Experience:

4Paws Mobile Veterinary Services

House Call Veterinarian/Owner (January 2017- Present)

4Paws is my own startup, a mobile Veterinary Services provider to The Peninsula and South Bay. After contracting as a house call Veterinarian for a local house call practice, I launched my own Concierge House call practice in 2017 to bring top quality Veterinary Services to my clients' homes. My referrals come in from many sources, including friends and family, local social media, and local clinics who cannot provide home-based hospice and euthanasia services for their own clientele.

I specialize in keeping animals healthy through preventive medicine, including early screening for diseases occurring more frequently in an aging animal population. Many diagnostic and therapeutic options are possible in the home-based environment, and I am always searching for new technologies to implement in my practice.

Independent Consultant (March 2010-Present)

Business Development, Product Marketing, and Product Development

I have been a business development and marketing consultant to many small companies, filling various roles as required in product development, market research, product marketing, business development and PR. My expertise spans therapeutics, diagnostics, molecular imaging, and medical devices in both the human and veterinary markets. In my 23 years as a biopharma startup consultant and full time senior management level employee, I assisted in raising greater than \$200 million in public and private equity, participated in four IPO's and an acquisition.

Highlights:

- **4PawsDX** is a veterinary startup creating liquid biopsy technology for cancer screening and monitoring of chemotherapy regimens in dogs. A simple blood test will be able to screen for tumor genes in blood, and identify the source, based on high speed genomic sequencing. I am advising the company on business strategy and involved in the initial broad population screening study as a Principal Investigator
- **AnimalBiome** is a commercial stage veterinary company that developed and sells screening tests to measure the health status of the intestinal biome in dogs and cats, and provides therapeutic capsules to restore the gut biome after chronic gut disturbances.
- **PetVivo Holdings Inc. (PETV:NASDAQ)** is an emerging biomedical device company focused on the licensing and commercialization of innovative medical devices for pets and pet therapeutics. PetVivo's

strategy is to commercialize proprietary products to treat arthritis, specifically for the equine and companion animal market. PetVivo's lead product, a veterinarian-administered joint injection for the treatment of osteoarthritis in dogs and horses, called Spryng, was commercially launched in 2021. I am a member of the Veterinary Advisory Board, and have performed case studies and media interviews for the company. I have administered greater than 50 doses of Spryng, and currently consult on commercial strategy for the Board and CEO.

- **Kindred Biosciences Inc., (Acquired by Elanco, ELAN:NASDAQ)** was a new veterinary pharmaceutical company developing new drug therapies for companion animals by licensing in human compounds with extensive preclinical data packages. I helped to prioritize pipeline projects, was a Principal Investigator for the SentiKin Pivotal Clinical Trial for pain management, and entered the first canine subject into the clinical study.
- **Vet Stem** is the leading veterinary Regenerative Medicine Company, using adipose-derived stem cells to treat diseases in both companion animals and horses. I was a product evangelist educating Veterinarians how to properly use this type of therapy in their practices.
- **Medipacs** developed an on-demand, pain management pump for humans. I created the market development plan, including form factor and technical marketing aspects of the product to commercialize the product in the veterinary market. I developed product requirements documentation, performed market research, and led the pricing sensitivity analysis.
- **Matrix Sensors** developed an automated, microchip-based diagnostic sensor to compete with ELISA in the R&D and diagnostics settings. It is a multiplexed assay system, with a direct electronic readout, sensitive at the picogram level to mass changes on the sensor, eliminating optical reporters and reducing cost per assay. Matrix's assay system is label free, thus eliminating optical readouts, I developed the website content, marketing materials, and negotiated a research deal with LabCorp.
- **Spectral Instruments Imaging** is an optics specialist and has developed the next generation in vivo optical imaging technology. I advised the company on marketing programs, product launch activities, website content and sales programs, screened the first two direct salespeople, and developed compensation plans.

Alta View Animal Hospital (January 2014-December 2016)

Associate Veterinarian

After several months as a part time Veterinarian at Alta View, I joined the practice full time in early 2014. Alta View is a busy companion animal practice that provides extensive diagnostic, therapeutic services to local small animal clients. They specialized in keeping animals healthy through preventative medicine, including early screening for diseases that occur more frequently in an aging animal population. Alta View made extensive use of digital radiology, ultrasound imaging, and IDEXX telemedicine to provide our clients with the most accurate diagnosis possible as a guide for developing medical and surgical options for our patients.

StemCor Systems, Inc. (March 2008-March 2010)**Executive Vice President**

StemCor Systems was an early stage medical device company that developed the MarrowMiner and Marrow Select. The MarrowMiner was a minimally invasive automated collection system for adult bone marrow derived stem cells for use in Regenerative Medicine. StemCor developed a pipeline of technologies for point of care stem cell processing and site-specific delivery of cells. I negotiated the first corporate partnership in the Bone Marrow Transplant field, and second corporate partnership in Orthopedics. Combined, these deals provided a potential of \$10 to \$12 million in milestones and development fees plus future royalties. I was in charge of Business Development, Marketing, Alliance Management, PR, and Marketing Communications.

Caliper LifeSciences**Marketing Consultant (August 2006-June 2007)**

Caliper LifeSciences acquired Xenogen in August of 2006. Post-acquisition, I remained as a marketing/business development consultant in charge of developing marketing campaigns for multiple business units. I led integration process of three disparate corporate websites, and brought eCommerce functionality to the new Caliper corporate website. Finally, I managed the integration of my Xenogen sales and marketing team into Caliper's corporate structure.

Xenogen Corporation (December 2002-August 2006)**VP, and Chief Business Officer**

Responsible for sales and marketing efforts for instrumentation, accessories, biological solutions, and custom animal model production, including customer service. Negotiated strategic co-promotion relationships to broaden reach of Xenogen technology and creating innovative business partnerships to promote the use of optical imaging in preclinical drug development.

Managed \$5 million departmental budget, led multi-product line sales forecasting process, and implemented Marketing programs for multiple product lines generating nearly \$50m in FY 2006 revenue. Established sales, marketing, and business development group at Xenogen in 8-month period, less than one typical sales cycle.

Identified, interviewed, and hired 5 key sales professionals in first year; group numbered twenty-two in year four. Led systematic shift of business to ex-US markets and to commercial clientele to generate high margin licensing revenue. Initiated distribution relationships in Japan, Taiwan, Germany/Switzerland/Austria, South Korea, and PRC.

BioSpace, Inc. (December 2000-December 2002)**SVP, Corporate Development**

Developed and implemented partnering strategy for proprietary information solutions and web-based products. Devised and led commercial development, launch and follow on marketing of web-based competitive intelligence offering, BioSpace CCIS (Clinical Competitive Intelligence System). CCIS sold nearly \$500,000 in first eight months post-launch. Initiated and signed multiple revenue-producing partnerships with international content providers, playing a key role in launching and marketing new subscription products, driving the "dot com" side of the business into a positive cash flow position.

Telik, Inc. (December 1998-December 2000)**Executive Director and Head of Business Development**

Developed partnering strategy for company's preclinical and clinical drug development programs in cancer and diabetes. Initiate market development activities and lead attack to identify and qualify potential corporate partners. Structure economic terms and negotiate partnerships that will both finance the company in short term, potentially leading to an IPO. Worked closely with Chairman and CEO to create external identity of company through personal appearances and creation of written and web-based public relations materials.

CV Therapeutics (February 1995-December 1997)**Executive Director, Business Development**

Made initial contacts, managed ongoing relationships and negotiated business terms with international pharmaceutical companies (US, Europe, Japan) with goal of licensing out CVTX's drug development and research programs. Assisted in raising approximately \$40 million in public and private equity capital. Negotiated CVTX's first corporate development partnership with Biogen. Member of the Biogen CVT Strategy Committee that handled technology transfer to Biogen. Negotiated company's first corporate research partnership with Bayer AG. Renegotiated terms of several key research and licensing agreements to facilitate eventual commercialization of pipeline products.

Member, IPO Working Group that took company public in 1997 CVTX:NASDAQ. Assisted in prospectus development and coordinated associated due diligence activities in support of IPO. Managed associated due diligence for subsequent purchase of large equity stake in CVTX by BB Biotech, a Swiss investment fund.

Microcide Pharmaceuticals (March 1993-April 1995)**Director, Business Development**

Founding employee of company. Organized and coordinated worldwide licensing activities and competitive analysis process. Negotiated corporate and academic licensing and collaborative agreements relating to the development of novel antibacterial drugs. Coordinated daily operations of company, including design and management of the company's laboratory facilities, associated construction projects totaling \$3.5 million, capital purchasing, and relationships with outside consultants. Spearheaded development of Operating Plan and Business Plan as part of the fund- raising process that netted the company over \$20 million in equity capital.

ALZA Corporation (October 1990-March 1993)**Director, Business Development**

Analyzed new product development opportunities incorporating client company drugs into ALZA therapeutic system technology. Negotiated development and commercialization agreements for new drug delivery technologies. Developed awareness of ALZA's new technologies in U.S. and European markets through focused presentations to pharmaceutical and biotechnology companies. Attended medical conventions and scientific meetings to analyze potential business opportunities.

Peninsula Equine (June 1984-October 1989)**Ambulatory Veterinarian, Large Animal Practice****Education:****Master of Business Administration 1990**

Walter A. Haas School of Business

VP, Alumni Affairs

Doctor of Veterinary Medicine 1984

University of California, Davis

Student Representative, CVMA Agriculture Interrelations Committee

Bachelor of Science, Biological Sciences, 1980

University of Southern California

Magna cum Laude, Phi Beta Kappa

EXHIBIT 7

Subject: RE: Probation Monitor Assignment
Date: Thursday, June 15, 2023 at 7:58:33 AM Pacific Daylight Time
From: Weiler, Jeffrey@DCA
To: Dr. Sterns
Attachments: image001.jpg, image002.png, image003.png, image004.jpg, image005.png, image006.png, image007.png

Dr. Sterns,

You've satisfied all of the CE required for the July 2022 – July 2023 period. Your next annual period begins next month for the July 2023 – July 2024 cycle. Please submit your CE class approval request forms to Alex when you're ready.

Thank you,
Jeff



Jeffrey Weiler
Lead Probation Monitor
Veterinary Medical Board
Department of Consumer Affairs
1747 N. Market Blvd, Suite 230
Sacramento, CA 95834
Direct: (916) 282-6911



[Join Our Email List!](#) | [VMB Customer Satisfaction Survey](#)

From: Dr. Sterns <[REDACTED]>
Sent: Wednesday, June 14, 2023 7:11 PM
To: Weiler, Jeffrey@DCA <Jeffrey.Weiler@dca.ca.gov>
Subject: Re: Probation Monitor Assignment
Importance: High

Dear Jeffrey,

Thank you for your message about the changing of the guard. I hope you are moving on to something exciting.

Could you please just confirm that I have completed all required CE for the 2022-2023 probationary period?

Thank you!

Sincerely
--



Boehringer
Ingelheim

LEARNING **LIVE**

Continuing Education Course Completion



PRACTICAL PAIN SCALES AND SCORING:

certificate awarded to

MICHAEL STERNS

LICENSE NUMBER 8662

DATE 2021-05-21

STATE California

SIGNATURE

CE PROVIDER

LIFE LEARN

Continuing Education

Lecture qualifies for 2.0 hour(s) of CE credit in accordance with the Continuing Education Policy of the State Education Department/The University of the State of New York as granted on April 16, 2018. Learning activity format: live webinar presentation

This program 749283 has been approved for 2.0 hour(s) (2.0 max CE Credits) of continuing education credit in jurisdictions that recognize RACE approval and is available to any one Veterinarian and/or Veterinary Technician. This RACE approval is for the subject matter category of Medical using the delivery method of Seminar/Lecture. This approval is valid in jurisdictions which recognize AAVSB RACE; however, participants are responsible for ascertaining each board's CE requirements. RACE does not "accredit" or "endorse" or "certify" any program or person, nor does RACE approval validate the content of the program.

For questions regarding your CE credit or for more information, contact bimeetings@lifelearn.com

©2020 Boehringer Ingelheim Animal Health USA Inc., Duluth, GA. All Rights Reserved. PSVCECERT (02/19)



CERTIFICATE OF COMPLETION

The individual named below

Michael Sterns

has satisfied all requirements for the successful completion of
Acute and Chronic Pain: What's the Connection?

Non Interactive Distance Learning for veterinarians and veterinary technicians

2021-03-18
DATE

Sheilah Robertson
PRESENTER




Mark Stephenson, DVM
Chief Veterinary Officer
LifeLearn

Course meets the requirements for the below hours of continuing education in jurisdictions which recognize AAVSB RACE approval; however, participants should be aware that some boards have limitations of the number of hours accepted in certain categories and/or restrictions on certain methods of delivery. RACE does not 'accredit' or 'endorse' or 'certify' any program or person, nor does RACE approval validate the content of the program.

This program, a section of the program, (July 2020 Submission, 1027-43281, issues 1 CE Credits of the 47.00 approved hours of continuing education. In accordance with the RACE Standards Section 2.05, d. an Established Provider may use portions of their program as stand alone presentations for continuing education credit.

Provider #1027 Program # 1027-43281

Certificate of Attendance

Fall Seminar

October 8-10, 2021

This is to certify that Michael J. Sterns, DVM completed continuing education hours on **October 8-10, 2021. [Twelve (12) hours maximum]**.

FRIDAY, OCTOBER 8, 2021

Tomo Wiggins, DVM, MEng, DACVO

Topic: Ophthalmology

4.0 CEU

- Emergency! Management of Blunt and Penetrating Ocular Trauma
- Beyond the Schirmer Tear Test: A Discussion of Dry Eye Disease
- Third Eyelid Disease—It's Not All About "Cherry Eye"
- Why Won't This #%% Corneal Ulcer Heal?

SATURDAY, OCTOBER 9, 2021

Tomo Wiggins, DVM, MEng, DACVO

Topic: Ophthalmology

2.0 CEU

- Canine Glaucoma—How to Best Handle a High-Pressure Situation
- When the Lights Go Out: Acute Vision Loss in Dogs and Cats

Katie Tolbert, DVM, Ph.D., DACVIM (SAIM)

Topic: Gastroenterology

2.0 CEU

- Manipulating the Microbiome (Parts 1 & 2)

SUNDAY, OCTOBER 10, 2021

Katie Tolbert, DVM, Ph.D., DACVIM (SAIM)

Topic: Gastroenterology

4.0 CEU

- Top Studies and How They Can Immediately Impact Your Practice
- Infectious Diarrhea Panel: When and How to Use It
- Diagnostic Approach to Feline Chronic Diarrhea
- Therapeutic Management of Canine Protein-Losing Enteropathy

Total CE Hours Earned 12

The CVMA is a statutorily approved California CE provider.

CE earned at the CVMA Fall Seminar will be accepted by the California Veterinary Medical Board (VMB) toward the mandatory 36 hours required every two years for licensure renewal.

Daniel L. Baxter

Daniel L. Baxter
CVMA Executive Director

This signature verifies that the course content and course instructors meet the minimum requirements under California Code of Regulations, Title 16, Division 20 sections 2085.6, 2085.7, 2086.5, and/or 2086.6.



Boehringer
Ingelheim

LEARNING **LIVE**

Continuing Education Course Completion



OVARIOHYSTERECTOMY:

certificate awarded to

MICHAEL STERNS

LICENSE NUMBER 8662

DATE 2022-03-25

STATE California

SIGNATURE

CE PROVIDER
LIFE LEARN

Lecture qualifies for 2.0 hour(s) of CE credit in accordance with the Continuing Education Policy of the State Education Department/The University of the State of New York as granted on April 16, 2018. Learning activity format: live webinar presentation

This program 870863 has been approved for 2.0 hour(s) (2.0 max CE Credits) of continuing education credit in jurisdictions that recognize RACE approval and is available to any one Veterinarian and/or Veterinary Technician. This RACE approval is for the subject matter category of Medical using the delivery method of Seminar/Lecture. This approval is valid in jurisdictions which recognize AAVSB RACE; however, participants are responsible for ascertaining each board's CE requirements. RACE does not "accredit" or "endorse" or "certify" any program or person, nor does RACE approval validate the content of the program.

For questions regarding your CE credit or for more information, contact livelearn@lifelearn.com

©2020 Boehringer Ingelheim Animal Health USA Inc., Duluth, GA. All Rights Reserved. PSVCECERT (02/19)



CERTIFICATE OF COMPLETION

The individual named below

Michael Sterns

has satisfied all requirements for the successful completion of

Spay/Neuter - Not Your Everyday Topics

2022-07-02

DATE

Philip A. Bushby

PRESENTER



Gene O'Neill

Gene O'Neill, CPA, CIA
Chief Executive Officer
North American Veterinary
Community

Course meets the requirements for the below hours of continuing education in jurisdictions which recognize AAAP RACE approval. However, participants should be aware that some boards have limitations of the number of hours accepted in certain categories and/or restrictions on certain methods of delivery. RACE does not "accredit" or "endorse" or "certify" any program or person, nor does RACE approval validate the content of the program. This program, a section of the program August 2021 Submission issues 4.5 CE Credits of the 92.00 approved hour of continuing education. In accordance with the RACE Standards Section 2.05, if an Established Provider may use portions of the program as stand alone presentations for continuing education credit.

Provider #50-27933 Program 20-746845



CERTIFICATE OF COMPLETION

The individual named below

Michael Sterns

has satisfied all requirements for the successful completion of
Elanco Pain Management Program

2022-04-28

DATE

James Gaynor

PRESENTER



Gene O'Neill

Gene O'Neill, CPA, CIA
Chief Executive Officer
North American Veterinary
Community

Course meets the requirements for the below hours of continuing education in jurisdictions which recognize NAVSB RACE approval, however, participants should be aware that some boards have limitations on the number of hours accepted in certain categories and/or restrictions on certain methods of delivery. RACE does not 'accredit' or 'endorse' or 'certify' any program or person, nor does RACE approval validate the content of the program. This program, a section of the program, November 2021 Submission Issues, 2 CE Credits of the 7300 approved hours of continuing education. In accordance with the RACE Standards Section 2.05, d, an established Provider may use portions of the program as stand alone presentations for continuing education credit.

Provider #50-27938 Program 20-892810



**Continuing Education
Certificate of Achievement**

This is to certify that

Michael Sterns

CA 8662

State and License #

Has successfully completed the following CE Program:

Companion Animal Osteoarthritis Summit

on 10/11/22

Presented by

**Leilani Alvarez, DVM, DACVSMR; Marie Bartling, DVM, cVMA, IVCA, CCRT, CVPP;
Lindsey Fry, DVM, cVMA, CCRP, CVPP; Wendy Hauser, DVM; Margaret Gruen, DVM, PhD,
DACVB; Matthew Brunke, DVM, DACVSMR; James Gaynor, DVM, MS, DACVAA;
Jennifer Johnson, DVM, CVPP; Rebecca Windsor, DVM, DACVIM (Neurology);
Dominique Sawyere, BVSc, MS, DACVS-SA;**

Authorized by

Sheri L. Berger, DVM, DACVO

CEO/Chief Visionary Officer

This curriculum provided 9 (nine) hours of continuing education credit using the interactive / distance method of delivery. This program is approved for a total of 9.00 hrs of CE credit (9.00 max) being available to any one veterinarian and/or veterinary technician by AAVSB RACE (program 20-925760), NY State and by the NJVMA.

This RACE approval is for the subject matter categories of Medical and Non-medical using the Interactive-Distance methods of delivery. This approval is valid in jurisdictions which recognize AAVSB RACE, NY State and NJVMA-approved Programs; Participants are responsible for ascertaining each board's CE requirements.



CERTIFICATE OF COMPLETION

The individual named below

The New Normals: An Evidence-Based Approach to Perioperative Pain Management

has satisfied all requirements for the successful completion of
Michael Sterns

01/23/2022

DATE

Mark Epstein

PRESENTER



Gene O'Neill, CPA, CIA
Chief Executive Officer
North American Veterinary
Community

Course meets the requirements for the below hours of continuing education in jurisdictions which recognize AAVSB RACE approval, however, participants should be aware that some boards have limitations of the number of hours accepted in certain categories and/or restrictions on certain methods of delivery. RACE does not 'accredit' or 'endorse' or 'certify' any program or person, nor does RACE approval validate the content of the program. This program, a section of the program, March 2022, Submission issues 1 CE Credits of the 92 50 approved hours of continuing education. In accordance with the RACE Standards Section 2.05, if an Established Provider may use portions of their program as stand alone presentations for continuing education credit.

Provider #50-27931 Program #020-900522



CERTIFICATE OF COMPLETION

The individual named below

Michael Sterns

has satisfied all requirements for the successful completion of

REPLAY: New Approaches to Identifying and Managing Canine OA: Targeted, Minimally Invasive Treatments

1

CE HOURS

2022-07-05

DATE

A handwritten signature in black ink that reads "Gene O'Neill".

Gene O'Neill, CPA, CIA
Chief Executive Officer
North American Veterinary Community



Certificate of Attendance

CVMA Fall Seminar – Virtual
September 30 - October 2, 2022

This is to certify that Michael Sterns, DVM completed 4 continuing education hours of interactive learning on **September 30. [Four (4) hours maximum]**.

FRIDAY, September 30:

4.0 CEU

Carol Reiner, DVM, Ph.D., DACVIM (SAIM) Topic: Respiratory Disease

- Canine Bacterial Pneumonia: Rethinking an Old Disease
- Pharmacologic Management of Respiratory Disease
- Pulmonary Hypertension in Dogs Caused by Non-Cardiac Disease
- Respiratory Diseases You May Not Have Learned in Veterinary School

Total CE Hours Earned 4.0

The CVMA is a statutorily-approved California CE provider.

CE earned at the CVMA Fall Seminar will be accepted by the California Veterinary Medical Board (VMB) toward the mandatory 36 hours required every two years for licensure renewal.

Daniel L. Baxter
CVMA Executive Director

This signature verifies that the course content and course instructors meet the minimum requirements under California Code of Regulations, Title 16, Division 20 sections 2085.6, 2085.7, 2086.5, and/or 2086.6.



CERTIFICATE OF ATTENDANCE

Dr. Michael Sterns

has successfully completed

Prudent Use of Antimicrobials Self Study

RACE Course # 20-851291

October 15, 2022 - October 21, 2022

Instructed by:

Peter Foley, MSc, DVM, DACVIM (SAIM)

Sandra McConkey, DVM, PhD, Diplomate ACVP

CE Provider: VETERINARY INFORMATION NETWORK

RACE Provider #50-26217

777 West Covell Blvd. • Davis, CA 95616 • 800.700.4636 • CEonVIN@vin.com

Delivery Method: Non-Interactive Program Category: Medical

State of Licensure: CA(8662)

Additional licensure

Member signature

A handwritten signature in black ink, appearing to read "Michael Sterns DVM", written over a horizontal line.

This program has been approved for veterinarians for 3.5 hours of continuing education credit in jurisdictions that recognize RACE approval.

Authorized by:

A handwritten signature in black ink, appearing to read "Paul Pion", written over a horizontal line.

Paul David Pion, DVM, DACVIM (Cardiology)
President/CEO VIN, Inc.



*Continuing Education
Certificate of Achievement*

**This is to certify that
Michael Sterns**

State and License # **CA 8662**
Completed the following seminar:

**Antimicrobial Stewardship Made Practical for the Companion Animal Practitioner
on 7/4/22**

**Presented by
Jennifer Granick, DVM, PhD, DACVIM (SAIM)**

**Authorized by
Sheri L. Berger, DVM, DACVO
CEO/Chief Visionary Officer**

This curriculum provided 1 hr of continuing education credit for veterinarians and veterinary technicians for the subject matter categories of: Medical using the online non-interactive method of delivery and meets the requirements in jurisdictions which recognize AAVSB RACE, NY State, and NJVMA approval. This program 542-43679 is approved by the AAVSB RACE to offer a total of 1.00 CE Credits (1.00 max) being available to any one veterinarian; and/or 1.00 Veterinary Technician CE Credits (1.00 max). This RACE approval is for the subject matter categories of: Medical using the delivery method of Non-Interactive-Distance. This approval is valid in jurisdictions which recognize AAVSB RACE; however, participants are responsible for ascertaining each board's CE requirements. RACE does not "accredit" or "endorse" or "certify" any program or person, nor does RACE approval validate the content of the program.

www.vetvine.com



CERTIFICATE OF COMPLETION

The individual named below

Michael Sterns

has satisfied all requirements for the successful completion of

Debunking Myths About Bugs & Drugs Podcast & Quiz

2022-07-05

DATE

Scott Weese

PRESENTER



Gene O'Neill

**Gene O'Neill, CPA, CIA
Chief Executive Officer
North American Veterinary
Community**

Course meets the requirements for the below hours of continuing education in jurisdictions which recognize AAVSB RACE approval, however, participants should be aware that some boards have limitations of the number of hours accepted in certain categories and/or restrictions on certain methods of delivery. RACE does not 'accredit' or 'endorse' or 'certify' any program or person, nor does RACE approval validate the content of the program. This program, a section of the program, April 2021 Submission issues 0.5 CE Credits of the 3.00 approved hour of continuing education. In accordance with the RACE Standards Section 2.05, d. an Established Provider may use portions of their program as stand-alone presentations for continuing education credit.

Provider #50-27933 Program 20-873508



CERTIFICATE OF COMPLETION

The individual named below

Michael Sterns

has satisfied all requirements for the successful completion of

Managing Canine Methicillin Resistant Staphylococcus

2022-07-05

DATE

Terese DeManuelle

PRESENTER



Gene O'Neill

Gene O'Neill, CPA, CIA
Chief Executive Officer
North American Veterinary
Community

Course meets the requirements for the below hours of continuing education in jurisdictions which recognize AAVSB RACE approval, however, participants should be aware that some boards have limitations of the number of hours accepted in certain categories and/or restrictions on certain methods of delivery. RACE does not 'accredit' or 'endorse' or 'certify' any program or person, nor does RACE approval validate the content of the program. This program, a section of the program, December 2021 Submission Issues 1 CE Credits of the 192.75 approved hours of continuing education, in accordance with the RACE Standards Section 2.05, d. an Established Provider may use portions of their program as stand alone presentations for continuing education credit.

Provider #50-27933 Program 20-872633

USDA-APHIS NATIONAL VETERINARY ACCREDITATION PROGRAM SUPPLEMENTAL TRAINING MODULE COMPLETION CERTIFICATE

Module 23: Use of Antibiotics in Animals

Content Finalized: February 2017, Revised October 2017

The content in this module has been approved expressly to serve as one unit of supplemental training for participants in USDA's National Veterinary Accreditation Program. Please ensure you retain, (save the file or print) this certificate. This certificate will be your only proof of having completed this module and will need to be provided to the appropriate official should APHIS audit your accreditation supplemental training records in the future. Contact your NVAP Coordinator for more details on accreditation renewal.

Michael

First Name

Sterns

Last Name

690 Showers Drive

Street Address, Apt. #

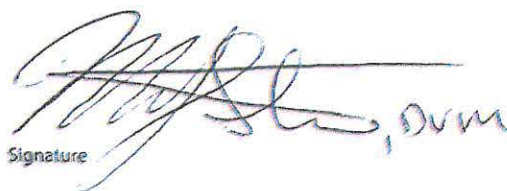
Mountain View, CA 94040

City, State, ZIP Code

0 6 9 2 3 6

National Accreditation Number (NAN)

I have read the contents of this
web-based supplemental training module


Signature

7/3/22
Date of Completion

Indicate the format of the supplemental materials reviewed

☒ Web-based





Animal & Veterinary Legal Services, PLLC

CERTIFICATE OF COMPLETION

By completing this course, you have earned 4 hours of continuing education credit.

**MICHAEL J. STERNS, DVM (CA #VET
8662)**

This certificate is awarded to the above-named individual for completing the course "Veterinary Medical Ethics" on 04/15/2014. The course was presented by Sarah L. Babcock, DVM, JD, and lasted for 4 hours.

Veterinary Medical Ethics (4 hours)

04/15/2014

Serial No.

001-0011151



Sarah L. Babcock
SARAH L. BABCOCK, DVM, JD
ANIMAL & VETERINARY LEGAL SERVICES, PLLC



Animal & Veterinary Legal Services, PLLC

CERTIFICATE OF COMPLETION

Board Program # 1078-37545 and VMA Course ID # 20-47

**MICHAEL J. STERNS, DVM (CA #VET
8662)**

This noninteractive-distance educational program has been approved for 2 hours of continuing education credit in jurisdictions that recognize CACCE approval. The Veterinary Medical Records Association has approved this course for 2 CPE credits for continuing education credit for its members.

Veterinary Medical Records (2 hours)

Date: 2022-03-19

Serial No.

cert no 1010101



Sarah L. Babcock
SARAH L. BABCOCK, DVM, JD



Animal & Veterinary Legal Services, PLLC

CERTIFICATE OF COMPLETION

RACE Program #1078-44173

**MICHAEL J. STERNS, DVM (CA #VET
8662)**

This self-paced, interactive e-learning program is approved for 1 hour of continuing education credit in jurisdictions that recognize RACE approval.

Top 10 Medical Record-Keeping Deficiencies (1 hour)

Date: 2022-03-15

Serial No.

cert eCopyr



Sarah L. Babcock
SARAH L. BABCOCK, DVM, JD
PRESIDENT, ANIMAL & VETERINARY LEGAL SERVICES, PLLC

Drip Learning Technologies

CERTIFICATE OF ATTENDANCE

Issued for Satisfactory Completion of the Course

Medical Record Keeping for Veterinarians

For satisfactorily completing this online course, which covers several topics related directly to the subject of medical record keeping as it pertains to the veterinary field, 6 continuing education contact hours have been awarded to:

MICHAEL J. STERNS, DVM

State: California

License: 8662



LANCE M. ROASA, DVM, JD

CEO | DRIP LEARNING TECHNOLOGIES, LLC



7/10/2022

Date

This program 1300-44543 is approved by the AAVSB RACE to offer a total of 6.00 CE Credits (6.00 max) being available to any one veterinarian; and/or 6.00 Veterinary Technician CE Credits (6.00 max). This RACE approval is for the subject matter categories of:

Category: Non-Medical Program using the delivery method of Non-Interactive-Distance. This approval is valid in jurisdictions which recognize AAVSB RACE; however, participants are responsible for ascertaining each board's CE requirements. RACE does not "accredit" or "endorse" or "certify" any program or person, nor does RACE approval validate the content of the program.



CALIFORNIA
VETERINARY
MEDICAL
ASSOCIATION

Certificate of Attendance

CVMA Spring Seminar

Yosemite Valley Lodge • March 11-13, 2022

This is to certify that Michael J. Sterns, DVM completed 12
hours of continuing education units on March 11-13, 2022 [Twelve (12) hours maximum].

Craig Griffin, DVM, DACVD

Topic: Dermatology

MARCH 11, 2022

4.0 CEU

- Get A Complete History, Really! What Is It!
- Tips and Tricks for Managing Atopic Dermatitis
- Chronic Pruritus: Diet Should Be Considered in All Cases
- Immunotherapy: How to Make It the Best Treatment for Atopic Dermatitis

MARCH 12, 2022

2.0 CEU

- Otitis: Making A Complete Diagnosis
- Be More Successful with Ears: Cleaning Tips and Tricks

JD Foster, VMD, MS, DACVIM (SAIM)

Topic: Nephrology / Urology

MARCH 12, 2022

3.0 CEU

- Acute Chronic Kidney Disease
- Hypertension Perils and Pitfalls of Measurement and Management
- Fluid Therapy for Kidney Disease

MARCH 13, 2022

3.0 CEU

- Acute Kidney Injury
- Working Up Pu/Pd
- Drug Dosing in Kidney Disease

Total CEU 12.0

The CVMA is a statutorily approved California CE provider.

CE earned at the CVMA Spring Seminar will be accepted by the California Veterinary Medical Board (VMB) toward the mandatory 36 hours required every two years for re-licensure.

Daniel L. Baxter
CVMA Executive Director

The signature verifies that the course content and course instructors meet the minimum requirements under California Code of Regulations, Title 16, Division 20 sections 2085.6, 2085.7, 2086.5, and/or 2086.6.



CONTINUING EDUCATION CERTIFICATE

For: Michael Sterns, DVM

Attendee Name and License

MedVet Virtual CE
Thursday, February 17, 2022
Total CE Credit Hours: 1.0

Micturition: Common Disorders and Recent Updates

by Josh Sparago, DVM,

Residency Trained in Veterinary Internal Medicine

MedVet Mountain View

RACE program approval # 894957

1.0 credit hour

Live Interactive Distance

This program is approved for 1.0 hours of continuing education credit by all states that recognize RACE approval. As RACE program providers, MedVet will upload the attendance roster to RACEtrack following each event for attendance to be centrally recorded and tracked with license information pertaining to attendees of each credit hour. To learn more about RACEtrack, visit <https://www.racetrack.org/racetrack>.



CONTINUING EDUCATION CERTIFICATE

For:

Michael Stems, DVM 8662 CA

Attendee Name and License

MedVet Virtual CE

Thursday, March 31, 2022

Total CE Credit Hours: 1.0

Essentials of Blunt Trauma

by Rebecca McQuitty, DVM, Diplomate, ACVECC

MedVet Silicon Valley

RACE program approval # 904315

Live Interactive Distance

This program is approved for 1.0 hour of continuing education credit in jurisdictions that recognize RACE approval.
As RACE program providers, MedVet will upload the attendance roster to RACEtrack following each event
for attendance to be centrally recorded and tracked with license information pertaining to attendees of each credit hour.
To learn more about RACEtrack, visit <https://www.racetrack.com>



Poisonous Plants in and Around the Home



Renee Schmid, DVM, DABVT, DABT

April 5th, 2022

Michael Sterns

Participant Name


Participant Signature

CA 8662

State(s) and license Numbers

Provider Name: Pet Poison Helpline
Provider Address: 3600 American Blvd W., Ste. 725, Bloomington, MN 55431
Provider Email Address: info@petpoisonhelpline.com
Provider Number: 50-30652
Program Number: 20-894350

Provider Representative Signature:



"This program (20-894350) is approved by the AAVSB RACE to offer a total of 1 CE Credits, with a maximum of 1 CE Credits being available to any individual veterinarian or veterinary technician/technologist. This RACE approval is for the subject matter categories of: Medical using the delivery method of Interactive-Distance. This approval is valid in jurisdictions which recognize AAVSB RACE; however, participants are responsible for ascertaining each board's CE requirements."



Approved as a New York State
sponsor of continuing education
for veterinarians and
veterinary technicians



**Death by Chocolate:
Assessment and
Management of Chocolate
Toxicosis in Pets**




Charlotte Flint, DVM, DABT, DABVT

February 1st, 2022

Michael Sterns

Participant Name


Participant Signature

CA 8662

State(s) and license Numbers

Provider Name: Pet Poison Helpline
Provider Address: 3600 American Blvd W., Ste. 725, Bloomington, MN 55431
Provider Email Address: info@petpoisonhelpline.com
Provider Number: 50-30652
Program Number: 20-871465

Provider Representative Signature:



"This program (20-871465) is approved by the AAVSB RACE to offer a total of 1 CE Credits, with a maximum of 1 CE Credits being available to any individual veterinarian or veterinary technician/technologist. This RACE approval is for the subject matter categories of: Medical using the delivery method of Interactive-Distance. This approval is valid in jurisdictions which recognize AAVSB RACE; however, participants are responsible for ascertaining each board's CE requirements."



CERTIFICATE of Attendance

This Certifies That

Michael Sterns

License #: State License:
8662 **CA**

Has Successfully Completed

RNA Particle Technology: One Small Replicon of RNA; One Giant Leap for Vaccinology

Presenter: Laura Greene, DVM, DACVIM

Date of Attendance: 9/26/22

This program has been approved for 1.00 hours of continuing education credit in jurisdictions that recognize RACE approval.

Program Type:	Provider #:	Program #:	Category:	Location:	Credits:
RACE	28545	916219	Medical	Live Virtual	1.00



Copyright 2022 Intervet Inc., d/b/a Merck Animal Health, a subsidiary of Merck & Co. Inc. All rights reserved.



CERTIFICATE OF ATTENDANCE

FOR ATTENDING:

A Review of Liver Disease in Dogs and Cats

1.00 CE Credit

DATE COMPLETED: **10/12/2022**

PRESENTED BY:

Veterinarian Recommended Solutions®

5 Sentry Parkway East, Suite 210

Blue Bell, PA 19422

vet.vrshealth.com

PROGRAM #: 20-935180

PROVIDER CATEGORY: Medical

AWARDED TO: Michael Sterna

STATE(S) OF LICENSURE: CA

LICENSE #(S): 8662

SIGNATURE:

AUTHORIZED BY:

Steve Mehler, DVM DACVS

Chief Medical Officer

This program has been approved for 1.0 hour of continuing education credit in jurisdictions that recognize RACE approval



CERTIFICATE OF COMPLETION

The individual named below

Michael Sterns

has satisfied all requirements for the successful completion of

The New Normals: An Evidence-Based Approach to Perioperative Pain Management

Non-Interactive Distance Learning for veterinarians and veterinary technicians

2022-01-23

DATE

Mark Epstein

PRESENTER

VetFolio
NAVC • LIFELEARN

Mark Stephenson

Mark Stephenson, DVM
Chief Veterinary Officer
LifeLearn

Course meets the requirements for the below hours of continuing education in jurisdictions which recognize AAVSB RACE approval; however, participants should be aware that some boards have limitations of the number of hours accepted in certain categories and/or restrictions on certain methods of delivery. RACE does not "accredit" or "endorse" or "certify" any program or person, nor does RACE approval validate the content of the program.

This program, a section of the program, (April 2020 Submission, 1027-42101, Issues 1, CE Credits of the 118.00 approved hours of continuing education. In accordance with the RACE Standards Section 2.05, d. an Established Provider may use portions of their program as stand alone presentations for continuing education credit.

Provider #1027 Program # 1027-42101



Certificate of Attendance

CVMA Spring Seminar

A VIRTUAL EVENT • Friday, March 3, 2023

This is to certify that Michael Sterns, DVM completed four (4)
continuing education hours of online interactive learning on March 3, 2023

Jane Sykes, BVSc (Hons), Ph.D., MBA, DACVIM (SAIM)

Topic: Infectious Diseases

MARCH 3, 2023

4.0 CEU

- Interpretation of Diagnostic Tests for Infectious Diseases
- A Shifting Spirochetosis: Renewed Approaches to Leptospirosis
- Antimicrobial Use Guidelines: Why, When, How Much &
- Pathogen Soup: Update on Canine Infectious Respiratory Disease

The CVMA is a statutorily approved California CE provider.

CE earned at the CVMA Spring Seminar will be accepted by the California Veterinary Medical Board (VMB) toward the mandatory 36 hours required every two years for re-licensure.

This course satisfies the one hour of California CE requirement on the judicious use of medical important antimicrobial drugs.

Daniel L. Baxter
CVMA Executive Director

The signature verifies that the course content and course instructors meet the minimum requirements under California Code of Regulations, Title 16, Division 20 sections 2085.6, 2085.7, 2086.5, and/or 2086.6.



Certificate of Attendance

CVMA Spring Seminar

A VIRTUAL EVENT • Saturday, March 4, 2023

This is to certify that Michael Sterns, DVM completed four (4)
continuing education hours of online interactive learning on March 4, 2023

Jane Sykes, BVSc (Hons), Ph.D., MBA, DACVIM (SAIM)

Topic: Infectious Diseases

MARCH 4, 2023

2.0 CEU

- Frustrating Fungi: Update on Diagnosis and Treatment of Deep Mycoses
- Pets, SARS-CoV-2, and COVID-19: What All Veterinarians Need to Know

Dana LeVine, DVM, Ph.D., DACVIM (SAIM)

Topic: Immune-Mediated Diseases

Austin Viall, DVM, MS, DACVP

MARCH 4, 2023

2.0 CEU

- Diagnostic Dilemmas in Canine Immune-Mediated Hemolytic Anemia
- Immune-Mediated Hemolytic Anemia—Treatment Time!

Total CEU

4

The CVMA is a statutorily approved California CE provider.

CE earned at the CVMA Spring Seminar will be accepted by the California Veterinary Medical Board (VMB) toward the mandatory 36 hours required every two years for re-licensure.

* This course satisfies the one hour of California CE requirement on the judicious use of medical important antimicrobial drugs.

Daniel L. Baxter
CVMA Executive Director

The signature verifies that the course content and course instructors meet the minimum requirements under California Code of Regulations, Title 16, Division 20 sections 2085.6, 2085.7, 2086.5, and/or 2086.6.



Certificate of Attendance

CVMA Spring Seminar

A VIRTUAL EVENT • Sunday, March 5, 2023

This is to certify that Michael Sterns, DVM completed four (4)
continuing education hours of online interactive learning on March 5, 2023

Dana LeVine, DVM, Ph.D., DACVIM (SAIM)

Topic: Immune-Mediated Diseases

Austin Viall, DVM, MS, DACVP

MARCH 5, 2023

4.0 CEU

- Consensus Statement on the Diagnosis of Immune Thrombocytopenia in Dogs and Cats
- Consensus Statement on the Treatment of Immune Thrombocytopenia in Dogs and Cats
- Hemostatic Hurdles (Part 1 & 2)

Total CEU 4.0

The CVMA is a statutorily approved California CE provider.

CE earned at the CVMA Spring Seminar will be accepted by the California Veterinary Medical Board (VMB) toward the mandatory 36 hours required every two years for re-licensure.

* This course satisfies the one hour of California CE requirement on the judicious use of medical important antimicrobial drugs.

Daniel L. Baxter
CVMA Executive Director

The signature verifies that the course content and course instructors meet the minimum requirements under California Code of Regulations, Title 16, Division 20 sections 2085.6, 2085.7, 2086.5, and/or 2086.6.

CERTIFICATE OF ATTENDANCE

Michael Sterns

2023-05-15 14:00:00

Apoquel: First Choice for Fast Relief (CE: 1)

2023-05-15

COMPLETION DATE: 5/15/2023

PARTICIPANT LICENSE #(S):

CE HOURS COMPLETED: 1.00

PARTICIPANT STATE(S) OF LICENSURE:

CE CATEGORY: Medical

Mary Kay Morrisberger

5/15/2023

MARY KAY MORRISBERGER

2023-05-15 14:00:00



Animal & Veterinary Legal Services, PLLC

CERTIFICATE OF COMPLETION

RACE Program #178-37546 and VHMA Course ID #20-48

DR. STERNS

This non interactive distance, non medical program has been approved for 4 hours of continuing education credit in jurisdictions that recognize RACE approval. The Veterinary Hospital Managers Association has approved this course for 4.0 (four) continuing education credits (Online Delivery).

Veterinary Medical Ethics (4 hours)

Date: 2023-04-22

Serial No.

cert_z87g5j2m



Sarah L. Babcock
SARAH L. BABCOCK, DVM, JD
PRESIDENT, ANIMAL & VETERINARY LEGAL SERVICES, PLLC

EXHIBIT 8

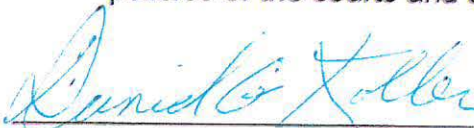
DECLARATION OF DANIEL G. KOLLER
IN THE MATTER OF TEJPAUL GHUMMAN, DVM,
OAH CASE NO. 2018120303
VMB CASE NO. 4602017000814

I, DANIEL G. KOLLER, declare, under penalty of perjury, under the laws of the State of California, the following to be true and correct to the best my recollections and knowledge and informed beliefs:

1. I am a licensed attorney in good standing in the State of California – Bar No. 106896.
2. I am also a practicing veterinarian in good standing in the State of Oregon – License No. 1362.
3. In 2016, I provided Dr. Tejpaal Ghumman, DVM, with a "Settlement Agreement" template to resolve a fee dispute that he had with one of his veterinary clients to sign and date.
4. At that time, I was not aware of the CA BUS & PROF Code Section 143.5 (2018)'s new prohibition on including licensing bodies in settlement "agreements."
5. The template I provided had been used by me in disputes for approximately 30 years.
6. I accept full responsibility and apologize for my failure to discover the new prohibition and my failure to change the template relating to licensing bodies. I have since corrected the template, but I have not had an opportunity to use it as yet, as revised.
7. In this particular case with Dr. Tejpaal Ghumman, DVM, I question whether or not there is any violation of CA BUS & PROF Code Section 143.5 (2018). The template, to the best of my knowledge and belief, was never signed nor otherwise executed by either party. Also, Section 143.5 appears to apply only to "agreements." As we all should know, any "agreement" requires "the meeting of minds" (Black's Law Dictionary, 2018). There was no such "meeting of minds" as the template was not signed nor otherwise executed by either party. There simply was no "agreement" to trigger Section 143.5's prohibition.



8. Additionally, I am unsure as to whether or not Section 143.5 became effective or otherwise publicized before the date of the template that I provided to Dr. Ghumman.
9. Also, it appears to me that Section 143.5 relates to the practice of law and should not be sanctionable to veterinary licensees such as Dr. Ghumman.
10. The concept of encouraging settlement agreements has always been to achieve finality and efficiency of justice in litigation and other disputes. Finality and efficiency of justice have always been paramount public policies in the courts. However, Section 143.5, as written, discourages settlements and, therefore, finality and efficiency of justice, contrary to the courts' public policies.
11. I can no longer advise settlement to clients given Section 143.5's administrative process exclusion by law from settlement agreements. This exclusion will clearly result in more civil litigation, contrary to the courts' public policies of finality and efficiency of justice.
12. While the standard clause may discourage reporting to administrative bodies, it is consistent with the public policies that the courts seek – namely, finality and efficiency of justice. It is not an effort to provide "hush money," as is alleged against Dr. Ghumman, which is a derogatory mischaracterization of the standard clause which was included in my original template.
13. To make Section 143.5 when verbal or written speech, without even a meeting of minds, actionable to discipline a licensed veterinary professional is unconscionable. It constitutes a prohibition on the veterinary licensee's First Amendment rights.
14. In my opinion, all settlement agreements seek finality and efficiency of justice, which should include finality from administrative law exposure. The simple wording that such standard clauses are "void" as relating to administrative bodies – without any additional licensee sanctions -- should suffice to achieve the public policies of the courts and also the public policy of administrative bodies.


DANIEL G. KOLLER, DVM, JD

Attorney at Law

Date: 10/8/2019

OFFICIAL STAMP
/ VICTORIA
PUBLIC - OI
SION NO.
RES FEBRUARY

Oregon Acknowledgments

Acknowledgment of Individual

STATE OF OREGON

COUNTY OF WASHINGTON

This instrument was acknowledged before me on OCTOBER 8, 2019
(date) by Daniel G. Holler (name(s) of person(s))

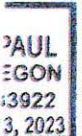
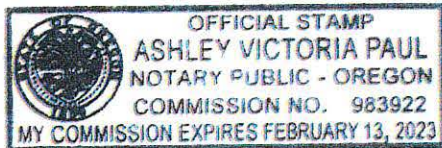
[Signature]

Notary Public

Print Name: ASHLEY V. PAUL

My Commission Expires:

02/13/2023



Re: Michael Sterns, DVM Termination of Probation

Date: June 16, 2023

Dear Veterinary Medical Board,

I am happy to write in support of Dr. Michael Sterns' request for termination of probation by the California Veterinary Medical Board. I am confident the VMB will be impressed with Dr. Sterns' medical care of both his patients and their owners. I am Dr. Darren Low, CA License VET25213, currently employed as an associate veterinarian at Alta View Animal Hospital.

Dr. Sterns and I have been colleagues for nearly two years, during my tenure at Alta View. Dr. Michael Sterns, owner of 4Paws Mobile Veterinary Services, refers cases which are better suited for a "brick and mortar" clinical environment rather than a house call. I enjoy working with Dr. Sterns and his clients. During the referral process Dr. Sterns provides the treatment history so that I am able to establish a VPCR at the clinic.

I have personally observed Dr. Sterns' relationships with his clients and patients, and how he provides a high level of care for both. His communication style is easy and interactive, he keeps the owners calm, and clearly communicates and implements follow up treatments at home. It is evident that patients and owners feel comfortable with Dr. Sterns.

In summary, I feel that continued probation for Dr. Sterns is unnecessary, and support its termination at this time. My experience with Dr. Sterns is that he is a competent medical professional who provides a high level of personalized care for his patients and clients.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Sincerely,



Darren Low, DVM
CA License VET25213

[REDACTED]
[REDACTED]
[REDACTED]

Re: Michael Sterns, DVM Termination of Probation

Date: June 20, 2023

Dear Veterinary Medical Board,

I am pleased to write in support of Dr. Michael Sterns' request for termination of probation by the California Veterinary Medical Board. I am Dr. Elizabeth Tenborg, CA License #23358, currently employed as a locum emergency clinician at emergency and specialty veterinary hospitals in the Bay Area.

I have known Dr. Sterns for three years as a colleague and as a referring veterinarian while employed as the Medical Director of Alta View Animal Hospital. He referred his internal medicine cases to me for consultation and continuing care, ensuring cases that were too complex for his mobile veterinary practice or cases that required hospitalization would be able to receive the care they needed. I appreciated working with Dr. Sterns, since he provided the necessary history, preliminary diagnostic workups, and client information for continuity of care. These pieces of information allowed me to establish a primary VCPR and manage the treatment plan as I saw fit. He also worked closely with me on several International Health Certificates in his capacity as a USDA Accredited veterinarian.

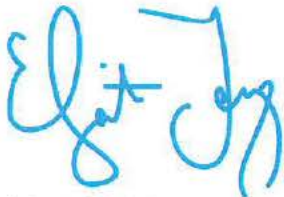
While at AltaView Animal Hospital, Dr. Sterns utilized appropriate multimodal analgesia for surgical procedures with an opiate component. He also ensured that each of his patients received appropriate preoperative/intraoperative antimicrobial therapy for surgical procedures, such as injectable Cefazolin or Ampicillin Sulbactam.

I also appreciated the value of Dr. Sterns' use of Neo, the cloud-based electronic medical records system (EMR) that I currently use in my own mobile practice. Neo provides a paperless method of tracking and transferring client records, procedure notes, current medication regimens and vaccine records as part of the patient referral process.

I endorse the termination of Dr. Sterns' probation. My experience with Dr. Sterns is that he is a competent medical professional who provides a high level of personalized care for his patients and clients in a time when there is a systemic shortage of veterinary care in California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Sincerely,



Elizabeth Tenborg, DVM
CA License #23358

[Redacted signature area]

EXHIBIT 9



PETITION FOR MODIFICATION OF PENALTY

PROBATION COMPLIANCE STATUS REPORT

PETITIONER: Michael J. Sterns VET8662

TYPE OF PETITION: Termination of Probation

CASE NUMBER: 4602017001022

CONDITIONS AND STATUS:

Obey All Laws	: In compliance.
Quarterly Reports	: In compliance.
Interview with the Board	: In compliance.
Cooperation with Probation Staff	: In compliance.
Probation Monitoring Costs	: In compliance.
Changes of Employment or Address	: In compliance.
No Supervision of Students, Interns, or Residents	: In compliance.
Notice to Employers	: In compliance.
Notice to Employees	: In compliance.
Tolling of Probation	: In compliance.
Maintain a Valid License	: In compliance.
Violation of Probation	: In compliance.
License Surrender While on Probation/Suspension	: In compliance.
Completion of Probation	: In compliance.
Cost Recovery	: In compliance.
Inspections	: In compliance.
Medical Records Review	: In compliance.
No New Ownership	: In compliance.
Continuing Education	: In compliance.
Ethics Training	: In compliance.

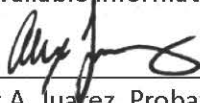
Probation Compliance Status Report
Michael J. Sterns, DVM

Premises Permits:

The Premises listed in the Stipulated Settlement and Disciplinary Order in the matter of the Accusation against Respondent include Alta View Animal Hospital (HSP 4645), Alta View Animal Hospital (HSP 38355) and 4Paws Mobile Veterinary Services (HSP 38157). HSP 4645 was revoked. HSP 38355 was issued on July 9, 2020, but not under ownership or management of Petitioner. HSP 38157 was issued to the petitioner on February 8, 2020, and is in good standing. HSP 38157 was not listed in the petition for termination of probation. If the petition is granted, the decision should terminate probation for HSP 38157 also.

This status report is based on all available information in the file.

Submitted by: _____



Alexander A. Juarez, Probation Monitor

Date March 29, 2024