

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

**IN THE MATTER OF THE PETITION FOR EARLY TERMINATION OF PROBATION RE  
HAROON M. MOHIUDDIN**

**Agency Case No. 4602023001725  
Office of Administrative Hearings Case No. TBD**

<b>TAB #</b>	<b>DOCUMENT</b>	<b>I.D.</b>	<b>ADMIT</b>
<b>1</b>	<ul style="list-style-type: none"><li>• Notice of Hearing (Redacted)</li></ul>		
<b>2</b>	<ul style="list-style-type: none"><li>• Certification of License History (Redacted).</li></ul>		
<b>3</b>	<ul style="list-style-type: none"><li>• Veterinary Medical Board Case No. AV 92-3: Decision and Order re: Stipulated Settlement (Effective November 1, 1993); Order re: Stipulated Settlement, First Amended and Supplemental Accusation, and; Accusation.</li><li>• Veterinary Medical Board Case No. 4602016000125: Decision and Order re: Stipulated Surrender of License and Order (Effective April 18, 2019); Order re: Stipulated Surrender of License and Order, Second Amended Accusation, First Amended Accusation, and; Accusation</li></ul>		
<b>4</b>	<ul style="list-style-type: none"><li>• Petition for Early Termination of Probation (Redacted).</li></ul>		
<b>5</b>	<ul style="list-style-type: none"><li>• Petitioner's Statement.</li></ul>		
<b>6</b>	<ul style="list-style-type: none"><li>• Petitioner's CV/Resume (Redacted).</li></ul>		
<b>7</b>	<ul style="list-style-type: none"><li>• Petitioner's Continuing Education.</li></ul>		
<b>8</b>	<ul style="list-style-type: none"><li>• Petitioner's Letters of Reference.</li></ul>		
<b>9</b>	<ul style="list-style-type: none"><li>• Compliance Report</li></ul>		
<b>10</b>	<ul style="list-style-type: none"><li>• Live Scan Request</li></ul>		
<b>11</b>	<ul style="list-style-type: none"><li>• Attorney Communication</li></ul>		

## EXHIBIT 1





**VIA ELECTRONIC MAIL, CERTIFIED MAIL AND REGULAR MAIL**

March 8, 2024

Haroon Mohiuddin  
701 Montana, Space 99  
Barstow, CA 92311

William A. Francis  
1484 N. Altadena Dr.  
Pasadena, CA 91107  
[REDACTED]

**RE: HEARING NOTICE**  
**OAH Case No. TBD**  
**Petition for Reinstatement or Modification of Penalty – Haroon Mohiuddin**

Dear Dr. Haroon Mohiuddin:

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

**Date: Friday, April 19, 2024**  
**Time: 9:00 AM 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=ma0aa1068857b98666046348a42288993>

Event number: 2485 279 2197  
Event password: VMB419

Phone audio conference: (415) 655-0001  
Access code: 2485 279 2197  
Passcode: 862419

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:

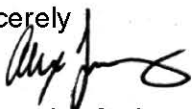
**Office of Administrative Hearings  
Attn: General Jurisdiction  
2349 Gateway Oaks, Suite 200  
Sacramento CA 95833**

**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](http://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](mailto:Alexander.Juarez@dca.ca.gov).

Sincerely



Alexander A. Juarez  
Probation Monitor  
Veterinary Medical Board

cc: Summer Haro, Deputy Attorney General  
William A. Francis, 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. Haroon M. Mohiuddin. 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. 7124:**

Haroon M. Mohiuddin  
701 Montara Rd. Unit #99  
Barstow, CA 92311-5740

First Issued: February 25, 1980  
Expiration: February 28, 2021  
Status: Voluntary Surrender  
Secondary Status: N/A

**Discipline:**

On April 8, 1992, Accusation AV 92-3 was filed against Haroon M. Mohiuddin. On May 12, 1993, a First Amended and Supplemental Accusation was filed against Haroon M. Mohiuddin. On October 20, 1993, a Stipulation for Settlement for AV 92-3 was adopted by the Board. On November 1, 1993, the Order became effective and Haroon M. Mohiuddin was placed on probation for five years with terms and conditions. On January 27, 2017, Accusation 4602016000125 was filed against Haroon M. Mohiuddin. On October 24, 2017, a First Amended Accusation was filed against Haroon M. Mohiuddin. On March 7, 2018, a Second Amended Accusation was filed against Haroon M. Mohiuddin. On March 19, 2019, a Stipulated Surrender of Licensure and Order was adopted by the Board. On April 18, 2019, the Order became effective and Haroon M. Mohiuddin's license was surrendered.

Dated at Sacramento, California, this 9<sup>th</sup> day of February 2024



Matt McKinney, Deputy Executive Officer

**COST CERTIFICATION**  
**CASE # 4602023001725**  
**Haroon M. Mohiuddin, DVM**

I, Matt McKinney, declare that I am the Deputy Executive Officer of the California Veterinary Medical Board, and, in that capacity, certify pursuant to the provisions of the Business and Professions Code Section 4808 and the California Code of Regulations Title 16, Section 2003, Petition for Reinstatement or Modification of Penalty No. 4602023001725 to be filed against Haroon M. Mohiuddin, DVM, who was formally licensed by this agency as a Veterinarian, and who held license number VET 7124.

In my capacity as manager, I review and approve payments for costs incurred by the Board while enforcing the laws and regulations under its jurisdiction. I have reviewed the records of the agency and the following costs have been incurred by the agency in connection with the investigation of the Second Amended Accusation and Stipulated Surrender of License and Order No. 4602016000125.

<b>1. Cost Recovery</b>	<b>\$ 41,703.75</b>
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<b>TOTAL COSTS</b>	<b>\$ 41,703.75</b>
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I certify pursuant to the provisions of Section 4808 of the Business and Professions Code of the State of California and Title 16, Section 2003 of the California Code of Regulations that, to the best of my knowledge, the foregoing statement of costs incurred by the California Veterinary Medical Board is true and correct and that the amounts set forth therein do not exceed the actual and reasonable costs of investigation in the Second Amended Accusation and Stipulated Surrender of License and Order No. 4602016000125.

Dated: February 9, 2024



**Matt McKinney, Deputy Executive Officer**  
**VETERINARY MEDICAL BOARD**

## EXHIBIT 3

BEFORE THE BOARD OF EXAMINERS IN  
VETERINARY MEDICINE  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Accusation )  
Against: )

No. AV 92-3

HAROON MOHIUDDIN, DVM )  
7621 White Oak Avenue )  
Reseda, CA 91335 )  
License No. 7124 )

ORDER

The foregoing Stipulation for Settlement is hereby  
adopted by the Board of Examiners in Veterinary  
Medicine, as its decision in this matter, and shall  
become effective on November 1, 1993.

IT IS SO ORDERED ON October 20, 1993.

Nancy L. Collins DVM  
President

Board of Examiners in  
Veterinary Medicine



1 DANIEL E. LUNGREN, Attorney General  
2 of the State of California  
3 WILLIAM L. MARCUS  
4 MARC GREENBAUM  
5 Deputy Attorneys General  
6 300 South Spring Street, 5th Floor  
7 Los Angeles, California 90013  
8 Telephone: (213) 897-2535  
9 Attorneys for Plaintiff

10 BEFORE THE  
11 BOARD OF EXAMINERS IN VETERINARY MEDICINE  
12 DEPARTMENT OF CONSUMER AFFAIRS  
13 STATE OF CALIFORNIA

10 In the Matter of the Accusation	)	Case No. AV 92-3
11 Against:	)	
12 HAROON MOHIUDDIN	)	STIPULATION FOR
13 7621 White Oak Ave.	)	SETTLEMENT
14 Reseda CA 91335	)	
15 License No. 7124	)	
16 Respondent.	)	

16 IT IS HEREBY STIPULATED BY AND BETWEEN Complainant, who  
17 is represented by Attorney General Daniel E. Lungren, by and  
18 through deputy attorneys general William L. Marcus and Marc  
19 Greenbaum, and Respondent, who is represented by Franklin D.  
20 Pelletier, Esq., as follows:

21 1. There are currently pending before the Board of  
22 Examiners in Veterinary Medicine (hereinafter, "the Board"), an  
23 Accusation and a First Amended and Supplemental Accusation in  
24 Case No. AV 92-3 against Haroon Mohiuddin (hereinafter,  
25 "respondent"). Respondent has been duly served with said  
26 Accusation and First Amended and Supplemental Accusation, has  
27 read said Accusation and First Amended and Supplemental



1 Accusation and has fully discussed them and this stipulation with  
2 his attorney-of-record, Franklin D. Pelletier, Esq..

3           2. Respondent understands that but for this  
4 stipulation, respondent would be entitled to a hearing on the  
5 charges in the Accusation and First Amended and Supplemental  
6 Accusation in Case No. AV 92-4, including the right to confront  
7 and cross-examine witnesses against him, to present his own  
8 evidence, to a written decision following hearing, to appeal any  
9 adverse decision, and to any and all other rights afforded him  
10 pursuant to the Administrative Procedure Act and the Code of  
11 Civil Procedure.

12           3. Respondent freely, voluntarily, knowingly and  
13 intelligently waives each of the rights described hereinabove at  
14 paragraph 2.

15           4. Respondent admits the following facts are true and  
16 correct:

17           Paragraphs 1, 2, 5, and 6 of the Accusation in Case  
18 No. AV 92-3 and paragraphs 1, 2, 8, 9, 10, and 11 of  
19 the First Amended and Supplemental Accusation in Case  
20 No. AV 92-3.

21           5. Respondent stipulates that the conduct set out in  
22 paragraph 4 hereinabove constitutes unprofessional conduct within  
23 the meaning of Business and Professions Code section 4883(g).

24           6. Based on the foregoing stipulations, admissions,  
25 and recitals, respondent agrees that the following discipline may  
26 be imposed on his License No. 7124:

27           License No. 7124, heretofore issued to respondent, is

1 revoked, said revocation being stayed and the license being  
2 placed on five (5) years probation on the following terms and  
3 conditions:

4           A. Respondent shall undergo psychotherapeutic  
5 evaluation at respondent's expense by a therapist selected by  
6 respondent, subject to prior approval by the Board. Respondent  
7 shall cause said therapist to forward his or her report to the  
8 Board, and respondent shall comply with all recommendations of  
9 the therapist until released from them by the Board. Respondent  
10 is not to resume the practice of veterinary medicine until the  
11 Board receives and accepts the written report of the  
12 psychotherapist.

13           B. Respondent shall undergo a complete physical  
14 examination at respondent's expense, which shall also include  
15 biological fluid testing, by a physician selected by respondent,  
16 subject to prior approval by the Board. Respondent shall cause  
17 said physician to forward his or her report to the Board, and  
18 respondent shall comply with all recommendations of said  
19 physician until released from them by the Board. Respondent is  
20 not to resume the practice of veterinary medicine until the Board  
21 receives and accepts the written report of the physician.

22           C. Respondent shall take a written clinical  
23 examination in veterinary medicine, emphasizing diagnosis,  
24 evaluation, treatment and care of small animals, within 90 days  
25 of the effective date of the decision. Said examination shall be  
26 administered by examiners selected by the Board and at  
27 respondent's expense. If respondent fails the examination, he

1 must wait at least 90 days before retaking the examination, and  
2 he shall be suspended until he passes a subsequent examination.  
3 Should respondent fail a second time, he must wait 180 days  
4 between each subsequent examination. Failure to pass the  
5 examination within three years of the effective date of the  
6 decision shall be an additional ground for revocation of  
7 respondent's probation.

8           D. Within sixty (60) days of the effective date of the  
9 decision, and on an annual basis thereafter, respondent shall  
10 submit to the Board for its prior approval, an educational  
11 program or course related to the diagnosis, treatment, and care  
12 of small animals, which shall not be less than 25 hours per year,  
13 for each year of probation. This program will be in addition to  
14 the Continuing Education requirements for relicensure. Following  
15 completion of each course, the Board or its designee may  
16 administer an examination to test respondent's knowledge of the  
17 course.

18           E. Respondent shall pay the Board \$5,808 for the costs  
19 of investigation and prosecution of this case, as follows: \$323  
20 per month in 18 monthly installments, commencing 90 days from the  
21 effective date of the decision.

22           F. Respondent shall not own, have any financial or  
23 beneficial interest in or serve as manager or operator of any  
24 veterinary facility or hospital.

25           G. Respondent shall practice veterinary medicine only  
26 as an employee of another licensed veterinarian in good standing  
27 with the Board. Should respondent leave his employment,

1 respondent shall immediately notify the Board and shall not  
2 practice veterinary medicine until he submits the name of the  
3 employer to the Board.

4 H. Respondent shall practice veterinary medicine only  
5 under the direct supervision and control of a licensed  
6 veterinarian in good standing with the Board. Respondent shall  
7 submit the name and qualifications of the proposed supervisor to  
8 the Board for its prior approval. Should respondent cease, for  
9 any reason, to be supervised by the approved supervisor,  
10 respondent shall immediately notify the Board and shall not  
11 practice veterinary medicine until the Board approves a new  
12 supervisor.

13 I. Respondent shall obey all federal and state laws  
14 and regulations substantially related to the practice of  
15 veterinary medicine.

16 J. Respondent shall report quarterly to the Board or  
17 its designee, under penalty of perjury, on forms provided by the  
18 division, stating whether there has been compliance with all  
19 terms and conditions of probation. In addition, the Board at its  
20 discretion may request additional in person reports to the  
21 probationary terms and conditions. If the final written  
22 quarterly report is not made as directed, the period of probation  
23 shall be extended until such time as the final report is received  
24 by the Board.

25 K. Respondent shall comply with the Board's probation  
26 surveillance program.

27 L. Respondent shall not supervise a registered intern

1 and shall not perform any of the duties of a preceptor.

2 M. Respondent shall notify all present and prospective  
3 employers of the decision in this case and the terms, conditions,  
4 and restrictions imposed on respondent by the decision in this  
5 case.

6 Within thirty (30) days of the effective of the  
7 decision and within fifteen (15) days of respondent undertaking  
8 new employment, respondent shall cause his employer to report to  
9 the Board in writing, acknowledging the employer has read the  
10 Accusation and the decision in this case and understands  
11 respondent's terms and conditions of probation.

12 N. Should respondent leave California to reside or  
13 practice outside this State, respondent must notify the Board in  
14 writing of the dates of departure and return. Periods of  
15 residency or practice outside the State shall not apply to  
16 reduction of the probationary terms.

17 O. If respondent violates probation in any respect,  
18 the Board, after giving respondent notice and the opportunity to  
19 be heard, may revoke probation and carry out the disciplinary  
20 order that was stayed. If an accusation or petition to revoke  
21 probation is filed against respondent during probation, the Board  
22 shall have continuing jurisdiction until the matter is final, and  
23 the period of probation shall be extended until the matter is  
24 final.

25 P. Upon successful completion of probation,  
26 respondent's license will be fully restored.

27 7. Should the Board, for any reason, fail or refuse to

1 adopt this stipulation, it shall be of no force or effect as to  
2 either party.

3 ACKNOWLEDGMENT

4 I have read the foregoing stipulation and have fully  
5 discussed it with my attorney-of-record, Franklin D. Pelletier,  
6 Esq.. I understand that I am agreeing that my license no. 7124  
7 may be revoked, with the revocation being stayed on condition of  
8 five years of probation. I further understand the terms and  
9 conditions of probation as set out in paragraph 6 of the  
10 stipulation.

11 I freely, voluntarily, knowingly and intelligently  
12 enter into this stipulation.

13 DATED: 10/4/93

HAROON MOHIUDDIN

Respondent

15 DATED: 10-4-93

FRANKLIN D. PELLETIER, ESQ.

Attorney for Respondent

DANIEL E. LUNGREN  
ATTORNEY GENERAL

20 DATED: August 12, 1993

By: William L. Marcus  
WILLIAM L. MARCUS  
MARC GREENBAUM  
Deputy Attorneys General  
Attorneys for Complainant

1 DANIEL E. LUNGREN, Attorney General  
of the State of California  
2 WILLIAM L. MARCUS  
Deputy Attorney General  
3 300 South Spring Street, 5th Floor  
Los Angeles, California 90013  
4 Telephone: (213) 897-2535  
5 Attorneys for Plaintiff

6  
7 BEFORE THE  
8 BOARD OF EXAMINERS IN VETERINARY MEDICINE  
DEPARTMENT OF CONSUMER AFFAIRS  
9 STATE OF CALIFORNIA

10 In the Matter of the Accusation  
Against:

Case No. AV 92-3

11 HAROON MOHIUDDIN  
7621 White Oak Ave.  
12 Reseda CA 91335  
License No. 7124

FIRST AMENDED AND  
SUPPLEMENTAL ACCUSATION

13 Respondent.  
14

15 COMPLAINANT ALLEGES THAT:

16 1. He is Gary K. Hill, Executive Officer of the Board  
17 of Examiners in Veterinary Medicine (hereinafter referred to as  
18 "the Board"), and makes and files this first amended and  
19 supplemental accusation solely in his capacity as such.

20 2. On or about February 25, 1980, the Board issued  
21 Veterinarian License No. 7124 to Haroon Mohiuddin (hereinafter  
22 referred to as "the Respondent"). Said license is currently in  
23 full force and effect.

24 3. Business and Professions Code section 4875 provides  
25 that the Board may revoke or suspend the license of any  
26 veterinarian for any cause provided in Article 4 (commencing with  
27 Section 4875) of the Veterinary Medicine Act. Section 4875 also

1 authorizes the Board to impose a fine, not to exceed \$5,000, for  
2 any of the causes specified by Business and Professions Code  
3 section 4883.

4 4. Business and Professions Code section 4883 provides  
5 that the Board may discipline a license for, among things,  
6 violation or attempting to violate, directly or indirectly, any  
7 of the provisions of Business and Professions Code section 4800  
8 et.seq. (subsection (c), unprofessional conduct (subsection (g)),  
9 failure to keep one's premises and all equipment therein in a  
10 clean and sanitary condition (subsection (h), fraud, deception,  
11 negligence, or incompetence in the practice of veterinary  
12 medicine (subsection (i)), or violation, or the assisting or  
13 abetting violation, of any regulations adopted by the Board  
14 pursuant to Business and Professions Code sections 4800 et.seq..

15 5. Business and Professions Code section 4825 provides  
16 that it is unlawful for any person to practice veterinary  
17 medicine or any branch thereof in this state unless at the time  
18 of so doing he holds a valid, unexpired, and unrevoked license as  
19 provided in the Veterinary Medicine act (Business and Professions  
20 Code section 4800 et.seq.).

21 6. Section 2030 of title 16 of the California Code of  
22 Regulations, a rule and regulation of the Board, provides, in  
23 pertinent part, that all premises where veterinary medicine is  
24 practiced and all instruments, apparatus and apparel used in  
25 condition with the practice shall be kept clean and sanitary all  
26 times and shall also conform to the following: a sanitary  
27 environment, including the proper routine disposal of waste



1 materials and proper sterilization or sanitation of all equipment  
2 used in diagnosis or treatment (subsection (d)(1)) and the  
3 capacity to render adequate diagnostic radiological services  
4 (subsection (d)(4)).

5           7. Section 2031 of title 16 of the California Code of  
6 Regulations, a rule and regulation of the Board, provides, in  
7 pertinent part, that every veterinarian performing any act as to  
8 any animal in his custody requiring a license issued pursuant to  
9 the Veterinary Medicine act shall prepare a written record  
10 concerning the animal which shall contain, in legible form, the  
11 following information, if available: the beginning and ending  
12 dates of custody of the animal (subsection (a)(4)) and progress  
13 and disposition of the case (subsection (a)(8)). Section  
14 2031(b)(1) provides that said records shall be maintained for a  
15 minimum of 3 years after the last visit.

16           8. Respondent is subject to disciplinary action  
17 pursuant to Business and Professions Code section 4883(g)  
18 (general unprofessional conduct) and 4883(i) (fraud, deception,  
19 negligence, and incompetence), as follows:

20           A. In or about January 1993, Denise Ball, who had  
21 previously taken her cats to respondent for treatment and/or  
22 boarding, boarded three cats--Katy, Sugar, and Molly--with  
23 respondent at his veterinary facility at 7621 White Oak  
24 Boulevard, Reseda, California. The cats were in good health when  
25 left with respondent and were in good health when last visited by  
26 Denise Ball and her children in late February 1993.

27           B. On or about March 8, 1993, respondent, without

1 notice to Denise Ball and, as respondent well knew, without  
2 authorization from Denise Ball or anyone else, took Katy, Sugar,  
3 and Molly, and at least seven other cats to the Animal Shelter at  
4 20655 Plummer Street, in Chatsworth, California.

5 C. Respondent repeatedly, and falsely, claimed to own  
6 all said cats, including Katy, Sugar, and Molly, and falsely  
7 signed documents claiming to be the owner of said cats. The  
8 documents which he signed also immediately released the cats,  
9 which, as respondent was advised by shelter staff, meant the cats  
10 could be and were likely to be immediately euthanized. Each of  
11 the ten cats, including Katy, Sugar and Molly, was euthanized on  
12 March 8, 1993.

13 D. On March 10, 1993, respondent first placed a  
14 telephone call to Denise Ball, leaving a message on her answering  
15 machine to come pick up her cats immediately from him. As  
16 respondent well knew at the time he left the message, he had  
17 taken the cats to the Animal Shelter two days before and, as  
18 respondent knew or should have known, Katy, Sugar and Molly had  
19 been dead for two days when he placed the call to Denise Ball.

20 E. At no time did Denise Ball authorize respondent or  
21 anyone else to give away or sell any of her cats, to take any of  
22 them to the Animal Shelter or to euthanize any of them or allow  
23 anyone else to euthanize them. At no time did Denise Ball give  
24 or sell any of the cats to respondent or authorize him to claim  
25 or represent himself as having ownership of any of them. At no  
26 time did Denise Ball advise respondent she was abandoning any of  
27 the cats, nor did she abandon any of the cats.

1           9. Respondent is subject to disciplinary action  
2 pursuant to Business and Professions Code section 4883(o), taken  
3 in conjunction with 16 C.C.R. §2031, as follows:

4           A. Complainant incorporates paragraph 7 of this first  
5 amended and supplemental accusation by reference as though fully  
6 set forth at this point.

7           B. As to Katy, Sugar, and Molly, respondent failed to  
8 prepare and maintain the records required by 16 C.C.R. §2031,  
9 including failing to record and maintain records of the beginning  
10 and ending dates of custody of each of said cats and the progress  
11 and disposition of each of said cats.

12           10. Respondent is subject to disciplinary action  
13 pursuant to Business and Professions Code section 4883(g), (h),  
14 (i) (for negligence and incompetence), and (o), the last taken in  
15 conjunction with 16 C.C.R. §2030, as follows:

16           A. On or about April 3, 1993, an inspection of  
17 respondent's veterinary facility at 7621 White Oak Boulevard,  
18 revealed newspapers stacked in hallways, used hypodermic  
19 syringes, at least some still containing liquid, in both  
20 examination rooms, loose tablets of medication on counters,  
21 radiographic equipment with a bag and boxes on it and with the  
22 radiographic room made inaccessible, expired medications, and a  
23 room with veterinary supplies covered with dust.

24           B. On or about April 6, 1993, a follow-up inspection  
25 of respondent's veterinary facility revealed used hypodermic  
26 syringes in one examination room, and the radiographic equipment  
27 with newspapers now stacked on it.

1 C. Respondent, in prior inspections of veterinary  
2 facility by representatives of the Board, including at least on  
3 September 19, 1990, February 25, 1991, and May 30, 1991, was  
4 warned about inadequate record-keeping, exposed needles on  
5 syringes, the lack of operative radiographic equipment, the  
6 maintenance of expired medication, among other violations of  
7 Board laws and regulations.

8 11. Respondent is further subject to discipline  
9 pursuant to Business and Professions Code sections 4883(c), taken  
10 in conjunction with Business and Professions Code section 4825,  
11 and 4883(g), as follows:

12 Between at least March 1, 1993, and April 26, 1993,  
13 respondent practiced veterinary medicine and maintained a  
14 veterinary office, although, as respondent well knew, he did not  
15 submit an application for renewal of his license until on or  
16 about April 22, 1993, and his license was not renewed until on or  
17 about April 27, 1993.

18 WHEREFORE, Complainant prays that a hearing be held on  
19 the matters alleged hereinabove and in the accusation in Case No.  
20 AV 92-3 and, following said hearing, the Board issue a decision:

21 1. Revoking or suspending License No. 7124, heretofore  
22 issued to respondent;

23 2. Fining respondent in an amount not to exceed  
24 \$5,000; and

25 /

26 /

27 /

1                    3. Taking such other and further relief action as the  
2 Board may deem proper.

3  
4 DATED: May 12, 1993

*Gary K. Hill*  
*(by Gary K. Hill)*  
GARY K. HILL  
EXECUTIVE OFFICER,  
BOARD OF EXAMINERS IN  
VETERINARY MEDICINE

7 Complainant

( Y  
1 DANIEL E. LUNGREN, Attorney General  
of the State of California  
2 WILLIAM L. MARCUS  
Deputy Attorney General  
3 300 South Spring Street, 5th Floor  
Los Angeles, California 90013  
4 Telephone: (213) 897-2535

5 Attorneys for Plaintiff  
6

7 BEFORE THE  
8 BOARD OF EXAMINERS IN VETERINARY MEDICINE  
DEPARTMENT OF CONSUMER AFFAIRS  
9 STATE OF CALIFORNIA

10 In the Matter of the Accusation ) Case No. AV 92-3  
Against: )  
11 HAROON MOHIUDDIN )  
7621 White Oak Ave. )  
12 Reseda CA 91335 )  
License No. 7124 )  
13 Respondent. )  
14

15 COMPLAINANT ALLEGES THAT:  
16

17 1. He is Gary K. Hill, Executive Officer of the Board  
18 of Examiners in Veterinary Medicine (hereinafter referred to as  
19 "the Board"), and makes and files this accusation solely in his  
20 capacity as such.

21 2. On or about February 25, 1980, the Board issued  
22 Veterinarian License No. 7124 to Haroon Mohiuddin (hereinafter  
23 referred to as "the Respondent"). Said license is currently in  
24 full force and effect.

25 3. Business and Professions Code section 4875 provides  
26 that the Board may revoke or suspend the license of any  
27 veterinarian for any cause provided in Article 4 (commencing with  
Section 4875) of the Veterinary Medicine Act. Section 4875 also

1 authorizes the Board to impose a fine, not to exceed \$5,000, for  
2 any of the causes specified by Business and Professions Code  
3 section 4883.

4 4. Business and Professions Code section 4883 provides  
5 that the Board may discipline a license for, among things,  
6 unprofessional conduct (subsection (g)) and fraud, deception,  
7 negligence, or incompetence in the practice of veterinary  
8 medicine (subsection (i)).

9 5. Respondent is subject to disciplinary action  
10 pursuant to Business and Professions Code section 4883(g) and  
11 4883(i), as follows:

12 A. On or about December 10, 1987, a cat named Yang was  
13 brought to respondent for treatment, bleeding severely from the  
14 mouth. Respondent diagnosed a fractured jaw and recommended  
15 surgery.

16 B. Respondent's records reflect surgery was performed  
17 on or about December 14, 1987. Yang was released on or about  
18 December 24, 1987.

19 C. Respondent was guilty of negligence, incompetence,  
20 gross negligence and general unprofessional conduct, in that:

21 (1) He failed to take a radiograph at the time Yang was  
22 brought in in order to confirm his diagnosis of a  
23 broken jaw, to help assess the extent of the injury,  
24 and to arrive at the proper course of treatment and  
25 a prognosis.

26 (2) He failed to make clear, accurate and adequate  
27 records, including, failing to clearly record the

(2) He failed to make clear, accurate and adequate records, including, failing to clearly record the dosages of medications used, failing to clearly record the date of surgery, and failure to record the surgical procedure employed.

(3) He used i.v. vitamin K for hemorrhage due to trauma, although it is not useful for hemorrhage due to trauma, and continued use of dexamethasone after the initial shock from trauma, which is contraindicated.

(4) He delayed fixation of the fracture for at least four days after Yang was brought to his clinic.

(5) He failed to take a radiograph either prior to or after surgery and until at least December 26, 1987.

(6) He performed surgery for comminuted fractures of both mandibles using only two crossed pins and in such a manner that the pins he placed failed by or before January 10, 1988, allowing inadequate time for healing of said fractures and the jaw was still unstable.

(7) Assuming respondent performed surgery on December 23, 1987, as recorded in his records, he released Yang only one day after surgery for fractures of both mandibles.

6. Respondent is subject to disciplinary action pursuant to Business and Professions Code section 4883(g)(3), in that:

From at least November 1, 1987, until at least March



1 29, 1989, respondent ordered, maintained, prescribed, dispensed  
2 and administered controlled substances at and from his veterinary  
3 office with an expired D.E.A. registration for the handling of  
4 controlled substances.

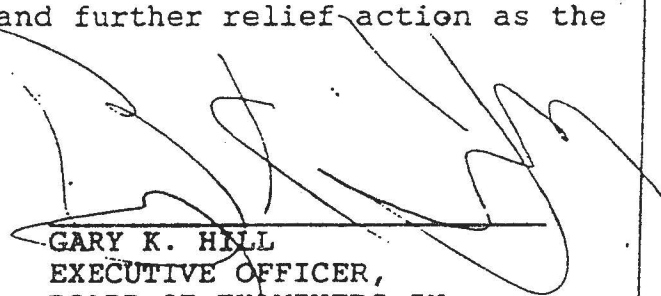
5  
6 WHEREFORE, Complainant prays that a hearing be held on  
7 the matters alleged hereinabove and, following said hearing, the  
8 Board issue a decision:

9 1. Revoking or suspending License No. 7124, heretofore  
10 issued to respondent;

11 2. Fining respondent in an amount not to exceed  
12 \$5,000; and

13 3. Taking such other, and further relief action as the  
14 Board may deem proper.

15  
16 DATED: 4/8/92

  
GARY K. HILL  
EXECUTIVE OFFICER,  
BOARD OF EXAMINERS IN  
VETERINARY MEDICINE

Complainant

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

In the Matter of the Second Amended  
Accusation Against:

**HAROON MOHIUDDIN  
790 E. Main Street  
Barstow, CA 92311**

**Veterinarian License No. VET 7124,**

**and**

**ISA COMPANION ANIMAL CLINIC,  
HAROON MOHIUDDIN  
790 E. Main Street  
Barstow, CA 92311**

**Premises Permit No. HSP 7294**

Case No. 4602016000125

OAH No. 2017120905

One.

**DECISION AND ORDER**

The attached Stipulated Surrender of License and 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 April 18, 2019.

It is so ORDERED March 19, 2019.



FOR THE VETERINARY MEDICAL BOARD  
DEPARTMENT OF CONSUMER AFFAIRS

1 XAVIER BECERRA  
Attorney General of California  
2 LINDA L. SUN  
Supervising Deputy Attorney General  
3 LISA A. MILLER  
Deputy Attorney General  
4 State Bar No. 281374  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 269-6275  
6 Facsimile: (213) 897-2804  
E-mail: Lisa.Miller@doj.ca.gov  
7 *Attorneys for Complainant*

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

12 In the Matter of the Second Amended  
13 Accusation Against:

14 **HAROON MOHIUDDIN**  
790 E. Main Street  
15 Barstow, CA 92311

16 **Veterinarian License No. VET 7124,**

17 **and**

18 **ISA COMPANION ANIMAL CLINIC,**  
**HAROON MOHIUDDIN**  
19 790 E. Main Street  
20 Barstow, CA 92311

21 **Premises Permit No. HSP 7294**

22 Respondent.

Case No. 4602016000125

OAH No. 2017120905

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

23  
24 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
25 entitled proceedings that the following matters are true:

26 **PARTIES**

27 1. Jessica Sieferman ("Complainant") is the Executive Officer of the Veterinary Medical  
28 Board ("Board"). She brought this action solely in her official capacity and is represented in this

1 matter by Xavier Becerra, Attorney General of the State of California, by Lisa A. Miller, Deputy  
2 Attorney General.

3 2. Haroon Mohiuddin ("Respondent") is represented in this proceeding by attorney  
4 George M. Wallace, whose address is: Wallace, Brown & Schwartz, 215 N. Marengo Ave, 3rd  
5 Floor, Pasadena, CA 91101-1504.

6 3. On or about February 25, 1980, the Board issued Veterinarian License No. VET 7124  
7 to Respondent. The Veterinarian License was in full force and effect at all times relevant to the  
8 charges brought in Second Amended Accusation No. 4602016000125 and will expire on  
9 February 28, 2019, unless renewed.

#### 10 JURISDICTION

11 4. Second Amended Accusation No. 4602016000125 was filed before the Board, and is  
12 currently pending against Respondent. The Accusation and all other statutorily required  
13 documents were properly served on Respondent on February 2, 2017. The Second Amended  
14 Accusation and all other statutorily required documents were properly served on Respondent on  
15 March 13, 2018. Respondent timely filed his Notice of Defense contesting the Accusation. A  
16 copy of the Second Amended Accusation No. 4602016000125 is attached as Exhibit A and  
17 incorporated by reference.

#### 18 ADVISEMENT AND WAIVERS

19 5. Respondent has carefully read, fully discussed with counsel, and understands the  
20 charges and allegations in Second Amended Accusation No. 4602016000125. Respondent also  
21 has carefully read, fully discussed with counsel, and understands the effects of this Stipulated  
22 Surrender of License and Order.

23 6. Respondent is fully aware of his legal rights in this matter, including the right to a  
24 hearing on the charges and allegations in the Second Amended Accusation; the right to confront  
25 and cross-examine the witnesses against him; the right to present evidence and to testify on his  
26 own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the  
27 production of documents; the right to reconsideration and court review of an adverse decision;  
28

1 and all other rights accorded by the California Administrative Procedure Act and other applicable  
2 laws.

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

5 **CULPABILITY**

6 8. Respondent understands that the charges and allegations in Second Amended  
7 Accusation No. 4602016000125, if proven at a hearing, constitute cause for imposing discipline  
8 upon his Veterinarian License.

9 9. For the purpose of resolving the Second Amended Accusation without the expense  
10 and uncertainty of further proceedings, Respondent agrees that, at a hearing, Complainant could  
11 establish a factual basis for the charges in the Second Amended Accusation and that those charges  
12 constitute cause for discipline. Respondent hereby gives up his right to contest that cause for  
13 discipline exists based on those charges.

14 10. Respondent understands that by signing this stipulation he enables the Board to issue  
15 an order accepting the surrender of his Veterinarian License without further process.

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

25 12. The parties understand and agree that Portable Document Format (PDF) and facsimile  
26 copies of this Stipulated Surrender of License and Order, including PDF and facsimile signatures  
27 thereto, shall have the same force and effect as the originals.  
28

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

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

## ORDER

IT IS HEREBY ORDERED that Veterinarian License No. VET 7124, issued to Respondent Haroon Mohiuddin, is surrendered and accepted by the Board.

1. The surrender of Respondent's Veterinarian License and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against Respondent. This stipulation constitutes a record of the discipline and shall become a part of Respondent's license history with the Board.

2. Respondent shall lose all rights and privileges as a veterinarian in California as of the effective date of the Board's Decision and Order.

3. Respondent shall cause to be delivered to the Board his pocket license and, if one was issued, his wall certificate on or before the effective date of the Decision and Order.

If Respondent ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked or surrendered license in effect at the time the petition is filed, and all of the charges and allegations contained in Second Amended Accusation No. 4602016000125 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

4. Respondent may not petition for reinstatement of a revoked or surrendered license/registration for three (3) years from the effective date of this Decision. If the Board grants

1 future reinstatement, Respondent agrees to reimburse the Board for its costs of investigation and  
2 enforcement of this matter in the amount of \$41,703.75 payable to the Board upon the effective  
3 date of such reinstatement Decision.

4 5. If Respondent should ever apply or reapply for a new license or certification, or  
5 petition for reinstatement of a license, by any other health care licensing agency in the State of  
6 California, all of the charges and allegations contained in Second Amended Accusation, No.  
7 4602016000125 shall be deemed to be true, correct, and admitted by Respondent for the purpose  
8 of any Petition for Reinstatement, Statement of Issues, or any other proceeding seeking to deny or  
9 restrict licensure.

10 ACCEPTANCE

11 I have carefully read the above Stipulated Surrender of License and Order and have fully  
12 discussed it with my attorney, George Wallace. I understand the stipulation and the effect it will  
13 have on my Veterinarian License. I enter into this Stipulated Surrender of License and Order  
14 voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the  
15 Veterinary Medical Board.

16  
17 DATED: 12, 14, 2018

Haroon M  
18 HAROON MOHIUDDIN  
Respondent

19 I have read and fully discussed with Respondent Haroon Mohiuddin the terms and  
20 conditions and other matters contained in this Stipulated Surrender of License and Order. I  
21 approve its form and content.

22 DATED: December 14, 2018

George Wallace  
23 GEORGE WALLACE  
Attorney for Respondent

24  
25 ENDORSEMENT

26 The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted  
27 for consideration by the Veterinary Medical Board of the Department of Consumer Affairs.

28 ///

///

Dated:

12/14/18

Respectfully submitted,

XAVIER BECERRA  
Attorney General of California  
LINDA L. SUN  
Supervising Deputy Attorney General



LISA A. MILLER  
Deputy Attorney General  
*Attorneys for Complainant*

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**Exhibit A**

**Second Amended Accusation No. 4602016000125**

FILED - STATE OF CALIFORNIA  
Veterinary Medical Board  
Sacramento, CA  
On: 3/7/2018 By: Helen Park

1 XAVIER BECERRA  
Attorney General of California  
2 LINDA L. SUN  
Supervising Deputy Attorney General  
3 LISA A. MILLER  
Deputy Attorney General  
4 State Bar No. 281374  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 269-6275  
6 Facsimile: (213) 897-2804  
Attorneys for Complainant

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

10 In the Matter of the Second Amended  
11 Accusation Against:

Case No. 4602016000125

12 HAROON MOHIUDDIN  
Isa Companion Animal Clinic  
13 790 E. Main Street  
Barstow, CA 92311

OAH No. 2017120905

SECOND AMENDED ACCUSATION

14 Veterinarian License No. VET 7124  
15 Premises Permit No. HSP 7294

16 Respondent.

18 Complainant alleges:

19 PARTIES

20 1. Annemarie Del Mugnaio ("Complainant") brings this Second Amended Accusation  
21 solely in her official capacity as the Executive Officer of the Veterinary Medical Board, Department  
22 of Consumer Affairs.

23 2. On or about February 25, 1980, the Veterinary Medical Board issued Veterinarian  
24 License Number VET 7124 to Haroon Mohiuddin ("Respondent"). The Veterinarian License was  
25 in full force and effect at all times relevant to the charges brought herein and will expire on February  
26 28, 2019, unless renewed.

27 ///

28 ///

3. On or about September 27, 2013, the Veterinary Medical Board issued a premises license, License No. HSP 7294 to Isa Companion Animal Clinic. The premises license was in full force and effect at all times relevant to the charges brought herein and will expire on May 31, 2018, unless renewed.

## JURISDICTION

4. This Second Amended Accusation is brought before the Veterinary Medical Board ("Board"), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

5. 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 section 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.

6. Section 118(b) of the Code provides, in pertinent part, that the expiration of a license shall not deprive a board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated. Under Business and Professions Code section 4843.5, the Board may renew an expired license at any time within five years after the expiration.

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 4855 of the Code states:

"A veterinarian subject to the provisions of this chapter shall, as required by regulation of the board, keep a written record of all animals receiving veterinary services, and provide a summary of that record to the owner of animals receiving veterinary services, when requested. The minimum amount of information which shall be included in written records and summaries shall be

1 established by the board. The minimum duration of time for which a licensed premise shall retain  
2 the written record or a complete copy of the written record shall be determined by the board."

3 9. Section 4856 of the Code states:

4 "(a) All records required by law to be kept by a veterinarian subject to this chapter, including,  
5 but not limited to, records pertaining to diagnosis and treatment of animals and records pertaining  
6 to drugs or devices for use on animals, shall be open to inspection by the board, or its authorized  
7 representatives, during an inspection as part of a regular inspection program by the board, or during  
8 an investigation initiated in response to a complaint that a licensee has violated any law or  
9 regulation that constitutes grounds for disciplinary action by the board. A copy of all those records  
10 shall be provided to the board immediately upon request."

11 10. Section 4883 of the Code states:

12 "The board may deny, revoke, or suspend a license or assess a fine as provided in Section  
13 4875 for any of the following:

14 ...

15 "(b) For having professional connection with, or lending the licensee's or registrant's name  
16 to, any illegal practitioner of veterinary medicine and the various branches thereof."

17 ...

18 "(g) Unprofessional conduct . . ."

19 ...

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

21 ...

22 "(o) Violation, or the assisting or abetting violation, of any regulations adopted by the board  
23 pursuant to this chapter."

24 **REGULATORY PROVISIONS**

25 11. California Code of Regulations, title 16, section 2030.05, subdivision (c) states "[t]he  
26 Licensee Manager is responsible for ensuring that no unlicensed activity is occurring within the  
27 premises or in any location where any function of veterinary medicine, veterinary surgery or  
28

1 veterinary dentistry is being conducted off the premises under the auspices of this premises  
2 license.”

3 12. California Code of Regulations, title 16, section 2032.05, states:

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

6 13. California Code of Regulations, title 16, section 2032.1, states:

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

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

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

16 “(2) The veterinarian has sufficient knowledge of the animal(s) to initiate at least a  
17 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 or by medically appropriate and timely visits to the premises where  
20 the animals are kept, and

21 “(3) The veterinarian has assumed responsibility for making medical judgments  
22 regarding the health of the animal and has communicated with the client a course of treatment  
23 appropriate to the circumstance.”

24 14. California Code of Regulations, title 16, section 2032.3, states:

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

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

2           ...

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

5           “(7) Data, including that obtained by instrumentation, from the physical examination.

6           “(8) Treatment and intended treatment plan, including medications, dosages,  
7 route of administration, and frequency of use.”

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

11           “(10) Diagnosis or assessment prior to performing a treatment or procedure.”

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

14           15. California Code of Regulations, title 16, section 2032.4, states:

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

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

21           ...

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

25           16. California Code of Regulations, title 16, section 2035, subdivision states in relevant  
26 part:

1       “(b) The supervising veterinarian of a R.V.T.<sup>1</sup>, permit holder or veterinary assistant shall  
2 make all decisions relating to the diagnosis, treatment, management and future disposition of the  
3 animal patient.”

4       “(c) The supervising veterinarian shall have examined the animal patient prior to the  
5 delegation of any animal health care task to an R.V.T., permit holder or veterinary assistant. The  
6 examination of the animal patient shall be conducted at such time as good veterinary medical  
7 practice requires consistent with the particular delegated animal health care task.”

#### 8                               **COST RECOVERY**

9       17. Section 125.3 of the Code provides, in pertinent part, that the Board may request the  
10 administrative law judge to direct a licentiate found to have committed a violation or violations of  
11 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
12 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being  
13 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be  
14 included in a stipulated settlement.

#### 15                               **FIRST CONSUMER COMPLAINT**

16       18. At the time of the events set forth herein, Respondent was a practicing veterinarian at  
17 Isa Companion Animal Clinic (“Isa Clinic”) in Barstow, California.

18       19. On or about August 27, 2015, The Humane Society brought canine patient “Kimberly”  
19 (later renamed Pandora) to Respondent to be spayed and vaccinated for rabies following her  
20 adoption by A.H. on or about August 26, 2015.

21       20. Upon retrieving Kimberly from Respondent, A.H. was given a spay and rabies  
22 certificate signed by Respondent, pain medication, an Elizabethan Collar (worn to prevent animals  
23 from disturbing surgical sites), and written post-operative discharge instructions. The Humane  
24 Society was billed for the spay surgical procedure, and A.H. was charged for the pain medication  
25 and the Elizabethan Collar.

26       21. Approximately three days after Kimberly’s discharge, A.H. inspected Kimberly and  
27 could not locate any indication of incision. When confronted, Respondent’s office claimed there

28       <sup>1</sup> R.V.T. refers to a registered veterinary technician.

1 was a miscommunication and that Kimberly only received the rabies vaccination because she had  
2 previously been spayed.

3 22. In February 2016, A.H. noticed Kimberly had enlarged mammary glands. A.H.  
4 brought Kimberly (now Pandora) to another veterinarian. That veterinarian could not locate an  
5 incision indicating animal patient Kimberly had ever been spayed, and thus concluded she had not  
6 been spayed. The veterinarian conducted exploratory surgery on or around February 8, 2016, and  
7 discovered Kimberly still had her ovaries and uterus, confirming she had not been spayed.

### 8 SECOND CONSUMER COMPLAINT

9 23. At the time of the events set forth herein, Respondent was a practicing veterinarian at  
10 ISA Companion Animal Clinic in Barstow, California.

11 24. On or about June 12, 2015, Y.C. brought her canine, "Pepper," to Isa Companion Pet  
12 Motel for boarding. On or about June 15, 2015, canine patient Pepper was discovered in his pen  
13 bleeding profusely from his left front paw and was taken to Isa Clinic next door. Respondent treated  
14 the wound and administered an antibiotic injection. Pepper was then discharged to Y.C.

15 25. On or about June 18, 2015, June 22, 2015, and June 26, 2015, Y.C. brought Pepper to  
16 Respondent for follow up visits. Respondent administered Kenalog, a corticosteroid.

17 26. At no time did Respondent prescribe Pepper pain medication.

### 18 THIRD CONSUMER COMPLAINT

19 27. At the time of the events set forth herein, Respondent was a practicing veterinarian at  
20 Isa Companion Animal Clinic in Barstow, California.

21 28. On or about February 15, 2014, L.E. brought her canine, "Melody," to ISA Clinic in  
22 Barstow, California, due to canine patient Melody's apparent and extreme pain. Animal patient  
23 Melody was taken to a private area of the clinic for several hours while L.E. waited. An unidentified  
24 individual eventually brought Melody back to L.E. in a sedated state. L.E. was not provided with  
25 a diagnosis or the medication for which she was charged. Melody did not improve.

26 29. On or about June 2, 2014, L.E. again brought Melody to ISA Clinic.

27 30. On or about July 19, 2016, the Board sent a letter to Respondent requesting the entire  
28 file related to animal patient Melody, to specifically include medical records. Respondent provided



1 medical records related to animal patient Melody for visits on November 13, 2014, and November  
2 18, 2014. On or about September 11, 2016, Respondent confirmed that all responsive documents  
3 had been provided to the Board. Respondent did not produce records for the February 15, 2014,  
4 and June 2, 2014, visits. Respondent's records dated November 13, 2014, note that animal patient  
5 Melody's last visit was in February 2014.

#### 6 FOURTH CONSUMER COMPLAINT

7 31. At the time of the events set forth herein, Respondent was a practicing veterinarian at  
8 Isa Clinic in Barstow, California.

9 32. On or about March 1, 2017, the Board received a consumer complaint regarding the  
10 care Respondent provided to five canine patients: Josh, Martine, Dayton, Harrison, and Sophie. The  
11 complaint alleged that the five dogs were neutered or spayed by Respondent and had "terrible  
12 infections and horrible swelling and bruising."

13 33. On or about February 8 and 9, 2017, several weeks prior to the consumer complaint,  
14 the Barstow Humane Society brought the five dogs into Isa Clinic. Respondent neutered canine  
15 patients Josh, Martine, Dayton, and Harrison. Respondent performed a spay explore on canine  
16 patient Sophie.<sup>2</sup> Following the surgeries, the dogs were released back to the care of Barstow Animal  
17 Shelter.

18 34. The Board requested that Respondent submit a copy of all records relating to his  
19 treatment of the five animal patients, as well as a typed copy of the medical records. Respondent  
20 submitted medical records which were handwritten and nearly illegible. In addition to failing to  
21 comply with the Board's request for typed records, Respondent also failed to comply with the  
22 requirement that all physical exam notes and surgical narratives had to be initialed or signed.

23 35. Respondent failed to administer and or failed to properly document the administration  
24 or maybe just no record of administration of? pain medication (analgesic) to any of the animal  
25 patients prior, during, or after surgery.

26  
27 <sup>2</sup> A spay explore refers to opening up the abdomen of a female animal to determine if she  
28 was previously spayed, as evidenced by a lack of ovaries and uterus. On February 9, 2017,  
Respondent noted that Sophie did not possess ovaries or a uterus.

1       36. Respondent failed to provide adequate surgical descriptions in the five animal patients'  
2 charts. He failed to record the route by which he administered Telazol, an injectable anesthetic.<sup>3</sup>  
3 Respondent also failed to record the incision site of the four neuter operations, and did not clearly  
4 note the route of delivery of gas anesthetic during the five surgeries, as required.

5                                   **FIFTH CONSUMER COMPLAINT**

6       37. At the time of the events set forth herein, Respondent was a practicing veterinarian at  
7 Isa Clinic in Barstow, California.

8       38. On or about March 23, 2017, the Board received a consumer complaint regarding the  
9 care Respondent provided to canine patient "Koal". The complaint alleged that canine patient Koal  
10 is now blind in the right eye as result of the care provided by Respondent. The complaint also  
11 alleged that the skin on canine patient Koal's elbows was "scraped up" and "sliced" while in  
12 Respondent's care, and at the time of complaint, had still not healed.

13       39. On or about January 4, 2016, a year prior to the complaint, Koal's owner brought him  
14 to Respondent due to a growth on Koal's right eyelid. He was administered two antibiotic  
15 injections, ampicillin and gentamicin<sup>4</sup>, as well as an injection of atropine<sup>5</sup>. Koal was also prescribed  
16 two antibiotics, Cephalexin and gentamicin eye drops, to take at home. There was no medical  
17 testing to determine if Koal had a bacterial infection that necessitated administration of antibiotics,  
18 and no sign of infection was present upon physical examination. Additionally, there was no  
19 indication that Koal required injectable atropine. Additionally, Respondent did not record in which  
20 of Koal's eyes the client was to administer the gentamicin eye drops.

21       40. In addition, during the visit on January 4, 2016, Koal was administered an injection of  
22 dexamethasone, a steroid, and an injection of meloxicam, a nonsteroidal anti-inflammatory  
23 medication (NSAID). Concurrent administration of a steroid and an NSAID to a canine has an  
24 increased risk of negative side effects. Respondent did not record his reasoning for administering a  
25

26       <sup>3</sup> Telazol is administered intravenously (IV), under the skin (SC), or in the muscle (IM).

27       <sup>4</sup> Antibiotics, such as ampicillin and gentamicin, are prescribed and administered when a  
bacterial infection is present or suspected, based on patient examination or test results.

28       <sup>5</sup> Injectable atropine is an anticholinergic drug used to increase heart rate and decrease  
salivation.

1 high-risk drug combination, nor did he educate the client as to the risks involved. Respondent also  
2 failed to record the route of administration for the five injections.

3 41. The vast majority of Respondent's written medical record for Koal for January 4, 2016  
4 is illegible.<sup>6</sup> There are several inconsistencies between the handwritten chart and the typed  
5 transcript of the chart for Koal's January 4, 2016 visit.

6 • The typed version of the chart states that a "comprehensive panel" (blood work) was  
7 performed on January 4, 2016. However, the blood work seen in the chart is dated January 8, 2016,  
8 the date of Koal's first surgery at ISA Companion Animal Clinic.

9 • The typed version states that the client was instructed that Koal wear an Elizabethan  
10 collar at all times. The handwritten chart does not mention an Elizabethan collar.

11 42. Koal returned to ISA Clinic for surgical removal of the mass on or about January 8,  
12 2016. Respondent's surgical report is inadequate, as he did not describe his surgical mass removal  
13 technique, such as where the incision was made and what suture pattern he used to close the surgical  
14 site. Respondent did not record the route of administration of Telazol.

15 43. The initials "YR" are written next to the Telazol anesthetic injection. The typed version  
16 of the chart confirms that ISA Clinic employee Yuri Rodriguez<sup>7</sup> ("Rodriguez") was the person who  
17 gave the anesthetic injection to Koal. Rodriguez is not a Registered Veterinary Technician or a  
18 licensed veterinarian. Unregistered assistants are not permitted to induce anesthesia. Respondent  
19 allowed Rodriguez to execute a task that Rodriguez was not licensed to perform.

20 44. Respondent did not perform a physical examination on Koal within 12 hours of placing  
21 him under anesthesia.

22 45. On the day of surgery, January 8, 2016, Respondent's records show that Koal was  
23 administered an injection of dexamethasone and released with oral Vetprofen, an NSAID, to be  
24 given by mouth for five days. Respondent did not record his reasoning for administering a high-

25 <sup>6</sup> The Board requested and received Koal's medical records from ISA Companion Animal  
26 Clinic on April 13, 2017. The Board requested and received a typed transcription of Koal's  
27 medical records on May 3, 2017.

28 <sup>7</sup> Yuri Rodriguez is the owner of ISA Clinic and also works at the clinic, assisting  
Respondent. On or about April 7, 2017, an investigator for the Department of Consumer Affairs  
interviewed Rodriguez. During the interview, Rodriguez stated that he has worked at the facility  
since it opened on January 11, 2014.

1 risk drug combination of a steroid and an NSAID, nor did he educate the client as to the risks  
2 involved. Additionally, Respondent did not record in which eye the client was to administer  
3 gentamicin eye drops.

4 46. The vast majority of Respondent's written medical record for Koal for January 8, 2016  
5 is illegible. There are several inconsistencies between the handwritten chart and the typed transcript  
6 of the chart for Koal's January 8, 2016 visit to ISA Clinic:

7 • The handwritten chart states that a prescription of Cephalexin, an oral antibiotic,  
8 was sent home with Koal on January 8, 2016. The typed chart states that "owner still has  
9 antibiotic...from first visit will refill as needed." The typed transcript makes no mention of the  
10 Cephalexin prescribed by Respondent on January 8, 2016.

11 • The typed transcript states that E.N., Koal's owner, was instructed that Koal should  
12 wear an Elizabethan collar at all times. The written chart makes no mention of an Elizabethan  
13 collar on January 8, 2016.

14 47. On or about January 11, 2016, Koal returned to ISA Clinic for a recheck examination.  
15 A temperature and two prescription refills are written in the medical record. There are no directions  
16 for use of the eye wash and gentamicin eye drops sent home with Koal on this dates, including the  
17 frequency of use.

18 48. There are several inconsistencies between the handwritten chart and the typed transcript  
19 of the chart for Koal's January 11, 2016 visit to ISA Clinic:

20 • The typed chart has a weight and vitals for Koal on this date. None of this information is  
21 in Respondent's handwritten chart.

22 • The typed transcript states that Koal's eye is red and that he was having blepharospasms<sup>8</sup>,  
23 possibly from the suture material. The typed chart also states that the dog is rubbing and scratching  
24 his eye, despite being instructed to wear an Elizabethan collar. None of this information is in  
25 Respondent's handwritten chart.

26  
27  
28 <sup>8</sup> Blepharospasms are involuntary and twitch-like closing of the eyelids due to discomfort  
in the eye. In the typed chart, it is misspelled as "blephnro spasams".

1       49. According to the medical record provided by Respondent, Koal returned to ISA Clinic  
2 on January 18, 2016, for a recheck, and had a second eyelid surgery on January 27, 2016. It is  
3 unclear if Respondent examined Koal during the January 18, 2016, visit, as there are no notes in  
4 the medical record other than temperature. The computerized invoice submitted to the Board by  
5 E.N., Koal's owner, shows that she was charged and paid for anesthesia and surgery on January  
6 18<sup>th</sup>, and was only charged and paid for a new eye medication on January 27, 2016. The receipt  
7 contradicts the handwritten medical record, which indicates that the second surgical procedure  
8 occurred on January 27, 2016.

9       50. The vast majority of Respondent's written medical record for Koal for January 27, 2016  
10 is illegible.

11       51. Respondent did not perform a physical examination of Koal within 12 hours of placing  
12 him under anesthesia for his second eyelid surgery and there is no diagnosis or adequate assessment  
13 of Koal's eyelid condition prior to surgery.

14       52. Respondent's surgical report for the second eyelid surgery is inadequate, as he does not  
15 describe his surgical mass removal technique, such as where the incision was made and what suture  
16 pattern he used to close the surgical site. No anesthetic agent is written in the medical record for  
17 the second eye surgery.

18       53. There is no record of an analgesic being administered to Koal during the perioperative  
19 period<sup>9</sup> of his second eyelid surgery.

20       54. On January 27, 2016, Respondent prescribed Optimune for Koal to use twice daily.  
21 Optimune is an eye medication that is primarily used to treat keratoconjunctivitis sicca,  
22 otherwise known as "KCS" or "dry eye". Optimune is sometimes used to decrease pigment  
23 development and granulation on the cornea. Koal did not receive a Schirmer tear test to diagnose  
24 KCS, nor did he have pigmentation or cornea granulation while he was under Respondent's care.  
25 Respondent wrote in the chart that Koal might have entropion<sup>10</sup>, ectropion<sup>11</sup>, and eyelid masses,  
26 none of which have any indication for Optimune usage. Furthermore, Respondent did not  
27 record in which eye the client was to administer the Optimune ointment.

28       55. There are several inconsistencies between the handwritten chart and the typed transcript  
of the chart for Koal's January 27, 2016 visit to ISA Clinic:

<sup>9</sup> The perioperative period is the period of time before surgery, during surgery, and during the immediate surgical recovery.

<sup>10</sup> Entropion is rolling inwards of the eyelid margin.

<sup>11</sup> Ectropion is rolling outward of the eyelid margin.

1       • The typed chart transcript states that Koal was prescribed oral Cephalexin and  
2 gentamicin eye drops on this date. In the handwritten medical record and the invoice receipt  
3 submitted by E.N., there is no mention of either prescription on January 27, 2016.

4       • The typed chart transcript states that ISA Clinic employee M.H. filled the  
5 prescriptions on January 27, 2016. In the handwritten medical record, it states "YR" (Yuri  
6 Rodriguez) filled the prescription.

7       55. The vast majority of Respondent's written medical record for Koal for February 1, 2016,  
8 is illegible. Koal underwent a third eyelid surgery on February 1, 2016, and was hospitalized for a  
9 period of time after the operation.

10       55. Respondent did not perform a physical examination within 12 hours of placing him  
11 under anesthesia for his operation.

12       56. Respondent's surgical report for the third eyelid surgery on February 1, 2016, is  
13 inadequate, as he does not describe his surgical mass removal technique, such as where the incision  
14 was made and what suture pattern he used to close the surgical site. No anesthetic agent is written  
15 in the medical record for the third eye surgery.

16       57. There is no record of an analgesic being administered to Koal during the perioperative  
17 period of his third eyelid surgery.

18       58. According to the statement of Koal's owner, E.N., Koal was hospitalized at ISA clinic  
19 for seven days, starting on February 1, 2016. The handwritten chart states "hospitalize 2-3 days",  
20 and the typed chart transcript states that Koal was hospitalized for four days. It is unclear how long  
21 Koal was in the custody of ISA clinic after surgery because there are no dates or progress notes  
22 written during hospitalization.

23       59. It is unclear what treatments, if any, Koal received during his hospitalization at ISA  
24 Clinic. E.N. was charged for 2 canine vaccinations, Dhppe (distemper vaccine) and Bordatella, on  
25 or about February 3, 2016; however, there is no record of these vaccinations in Koal's medical  
26 record. Respondent's failure to record these vaccinations would lead another veterinarian reviewing  
27 Koal's medical records to believe Koal was overdue for the distemper and Bordatella vaccines,  
28 potentially resulting in inappropriate over-vaccination.

60. There are several inconsistencies between the handwritten chart and the typed transcript of the chart for Koal's February 1, 2016 visit to ISA Clinic:

- The typed chart transcript states that Koal's weight was 79 lbs. on February 1, 2016. The handwritten record from this date states that Koal's weight was 72 lbs.
- The typed chart transcript from February 1, 2016, states "Sugery [sic] will not be done at owners request." The handwritten chart and E.N.'s account show that surgery did occur on February 1, 2016.

61. Koal returned to ISA Clinic on February 20, 2016 for a recheck. ISA Clinic did not provide a typed transcript for this date of service. Respondent's handwritten medical record states "cloudy, 50%". Respondent failed to document which eye was cloudy, what area of the eye was cloudy, what testing options he discussed with the client, and whether he referred the matter to a veterinary ophthalmologist to determine the cause of the cloudiness.

62. Koal returned to ISA Clinic on May 18, 2016. Sutures from Koal's eyelid surgery of February 1, 2016, were removed during this visit, according to the typed transcript of the chart and E.N.'s statement. Koal's suture removal is not noted in the handwritten chart of May 18, 2016. There is no explanation of why Respondent did not remove the sutures on February 20, 2016, and instead left them in for several more months.

63. The vast majority of Respondent's written medical record for Koal for May 18, 2016 is illegible.

## SIXTH CONSUMER COMPLAINT

64. At the time of the events set forth herein, Respondent was a practicing veterinarian at Isa Clinic in Barstow, California.

65. On or about November 19, 2015, the Board received a consumer complaint regarding the care Respondent provided to animal patient "Peppa", a pot-bellied pig. The complaint alleged that client L.Z. called Isa Clinic on or about November 10, 2015, and requested a veterinary house call because her pig, Peppa, was in labor. Yuri Rodriguez arrived at her house and administered an oxytocin<sup>12</sup> injection to Peppa. The complaint further stated that L.Z. allowed Rodriguez to treat

<sup>12</sup> Oxytocin is a prescription medication that increases uterine contractions.

1 Peppa, believing that he was a veterinarian. After Peppa received the oxytocin injection, four of her  
2 piglets died.

3 66. On or about April 7, 2017, a Board investigator visited Isa Clinic to obtain information  
4 regarding L.Z.'s complaint. The investigator obtained a copy of Peppa's chart. There was no entry  
5 for the incident reported to have occurred on November 10, 2015; the only entry was dated  
6 December 7, 2014, which stated that Respondent "will not examine" Peppa.

7 67. During the investigator's interview with Rodriguez on April 7, 2017, Rodriguez told  
8 the Board investigator that he went on approximately 10 house calls in which he and Respondent  
9 both went out to the house calls; however, Respondent did not get out of the van. Rodriguez  
10 admitted that during these ten house calls, Respondent would send Rodriguez in to provide  
11 whatever treatment needed to be done.

12 68. Rodriguez admitted that he went on a house call in November 2015 for a pig having  
13 complications in labor. Rodriguez told the Board investigator that he and Respondent went to the  
14 client's house. Rodriguez then administered an oxytocin shot to Peppa, which he was not licensed  
15 to perform. Respondent failed to examine Peppa and did not make the decisions relating to a  
16 diagnosis or treatment administered to Peppa.

17 **FIRST CAUSE FOR DISCIPLINE**

18 **(Negligence)**

19 69. Complainant refers to, and by this reference incorporates, the allegations set forth  
20 above in paragraphs 18 through 68 as though fully set forth herein. Respondent Haroon Mohiuddin  
21 is subject to disciplinary action under sections 4875 and 4883, subdivision (i), in that Respondent's  
22 care was negligent. The circumstances are as follows:

23 a. Pain medication was prescribed and dispensed to canine patient Kimberly by  
24 someone other than a licensed veterinarian upon discharge from ISA Clinic on or about August 27,  
25 2015. Respondent, as the Licensee Manager, is responsible for ensuring that no unlicensed activity  
26 is occurring on the premises.

27 b. Respondent failed to provide pain medication to canine patient Pepper during a time  
28 of injury and following surgical repair of wounds on or about June 15, 2015.



1 c. Respondent failed to provide pain medication prior, during, or after surgery for  
2 canine patients Josh, Martine, Dayton, Harrison, and Sophie on or about February 8-9, 2017.

3 d. Respondent prescribed and administered antibiotic injections (ampicillin and  
4 gentamicin) to canine patient Koal on or about January 4, 2016, although there was no sign of an  
5 infection during Koal's physical examination. Respondent did not perform any medical testing on  
6 January 4, 2016 to determine if there was an infection.

7 e. Respondent administered injectable atropine, an anticholinergic drug, to canine  
8 patient Koal on or about January 4, 2016, although there was no indication that Koal needed  
9 injectable atropine.

10 f. Respondent concurrently administered a steroid and an NSAID to canine patient  
11 Koal on or about January 4, 2016, without indication of necessity and with educating the client on  
12 the high risk of negative side effects.

13 g. Respondent concurrently administered a steroid and an NSAID to canine patient  
14 Koal on or about January 8, 2016, without indication of necessity and with educating the client on  
15 the high risk of negative side effects.

16 h. Respondent failed to provide pain medication prior, during, or after surgery for  
17 canine patient Koal on or about January 18, 2016 (falsely recorded in Respondent's records as  
18 occurring on January 27, 2016).

19 i. Respondent failed to provide pain medication prior, during, or after surgery for  
20 canine patient Koal on or about February 1, 2016.

21 j. Respondent failed to document vaccinations administered to canine patient Koal on  
22 or about February 3, 2016.

23 k. Respondent failed to adequately examine and discuss treatment options for canine  
24 patient Koal's abnormal eye on or about February 20, 2016.

25 **SECOND CAUSE FOR DISCIPLINE**

26 **(Failure to Establish Veterinarian-Patient Relationship)**

27 70. Complainant refers to, and by this reference incorporates, the allegations set forth  
28 above in paragraphs 18 through 30 as though fully set forth herein. Respondent Haroon Mohiuddin

1 is subject to disciplinary action under sections 4875 and 4883, subdivision (g), in conjunction with  
2 California Code of Regulations, title 16, section 2032.1, subdivision (a), in that Respondent  
3 engaged in unprofessional conduct as follows:

4 a. Respondent failed to establish a veterinarian-patient relationship when he failed to  
5 perform a physical examination on canine patient Kimberly.

6 b. Respondent prescribed medication (Clavamox) to canine patient Kimberly without  
7 establishing a veterinarian-patient relationship.

8 c. Respondent administered a rabies vaccine to canine patient Kimberly without  
9 establishing a veterinarian-patient relationship.

10 d. Respondent treated canine patient Melody on or about November 13, 2014, without  
11 establishing a veterinarian-patient relationship.

12 e. Respondent treated canine patient Melody on or about November 13, 2014, without  
13 performing a physical examination.

14 **THIRD CAUSE FOR DISCIPLINE**

15 **(Incompetence)**

16 71. Complainant refers to, and by this reference incorporates, the allegations set forth  
17 above in paragraphs 18 through 68 as though fully set forth herein. Respondent Haroon Mohiuddin  
18 is subject to disciplinary action under sections 4875 and 4883, subdivision (i) as follows:

19 a. Respondent demonstrated incompetence due to his failure to perform veterinary  
20 medicine in a manner consistent with current veterinary medical practice. The circumstances are  
21 that Respondent displayed a lack of minimal knowledge of rabies vaccination protocols associated  
22 with his professional obligations when he signed the certificate stating that canine patient  
23 Kimberly's next rabies vaccination was due three years later.

24 b. Respondent failed to comprehend the narrow indications for use of Optimune, a  
25 medication he prescribed to canine patient Koal on or about January 27, 2016.

26 ///

27 ///

28 ///

1 **FOURTH CAUSE FOR DISCIPLINE**

2 **(Deception)**

3 72. Complainant refers to, and by this reference incorporates, the allegations set forth  
4 above in paragraphs 18 through 68 as though fully set forth herein. Respondent Haroon Mohiuddin  
5 is subject to disciplinary action under sections 4875 and 4883, subdivision (i) as follows:

6 a. Respondent deceived A.H. into believing canine patient Kimberly had been spayed  
7 when Respondent signed a document intended to cause the reader to believe animal patient  
8 Kimberly had been spayed, when in fact she had not.

9 b. Respondent deceived readers of canine patient Koal's medical chart by writing that  
10 Koal's second eyelid surgery occurred on January 27, 2016, when in fact it occurred on January  
11 18, 2016.

12 c. Respondent purposefully deceived client L.Z. by concealing the fact that the  
13 representative he sent from Isa Clinic on or about November 10, 2015, to treat animal patient Peppa  
14 was not a licensed veterinarian.

15 **FIFTH CAUSE FOR DISCIPLINE**

16 **(Fraud)**

17 73. Complainant refers to, and by this reference incorporates, the allegations set forth  
18 above in paragraphs 18 through 68 as though fully set forth herein. Respondent Haroon Mohiuddin  
19 is subject to disciplinary action under sections 4875 and 4883, subdivision (i), in that Respondent  
20 committed fraud as follows:

21 a. Respondent misled A.H. to believe canine patient Kimberly had been spayed, for which  
22 The Humane Society was charged, when she had not been spayed and caused A.H. to pay for an  
23 unnecessary prescription for pain medication and an Elizabethan Collar.

24 b. Respondent concealed from client L.Z. that the representative he sent to treat animal  
25 patient Peppa on or about November 10, 2015, was not a licensed veterinarian.

26 ///

27 ///

28 ///

1 SIXTH CAUSE FOR DISCIPLINE

2 (Inadequate and Illegible Record Keeping)

3 74. Complainant refers to, and by this reference incorporates, the allegations set forth  
4 above in paragraphs 18 through 68 as though fully set forth herein. Respondent Haroon Mohiuddin  
5 and ISA Companion Animal Clinic are subject to disciplinary action under sections 4875, 4855,  
6 4856, and 4883, subdivision (g), in conjunction with California Code of Regulations, title 16,  
7 section 2032.3, subdivisions (a), (a)(1), (a)(6), (a)(7), (a)(8), (a)(9), (a)(10) and (a)(12), in that  
8 Respondent failed to properly keep records as follows:

9 a. Respondent failed to maintain legible written medical records for canine patient  
10 Kimberly.

11 b. Respondent failed to document the administration of a rabies vaccine to canine  
12 patient Kimberly in the medical record.

13 c. Respondent failed to record the name of the antibiotic given to canine patient Pepper  
14 on or about June 15, 2015, as well as the route of administration.

15 d. Respondent failed to include the name or initials of the person responsible for  
16 medical record entry for canine patient Pepper on or about June 18, 2015.

17 e. Respondent failed to include the route by which the injections were given to canine  
18 patient Pepper on or about June 18, 2015.

19 f. Respondent failed to include the name or initials of the person responsible for  
20 medical record entry for canine patient Pepper on or about June 22, 2015.

21 g. Respondent failed to include the name or initials of the person responsible for  
22 medical record entry for canine patient Pepper on or about June 26, 2015.

23 h. Respondent failed to maintain records for medical care provided to canine patient  
24 Melody on February 15, 2014, and June 2, 2014.

25 i. Respondent failed to provide medical records for canine patient Melody upon  
26 request of the Board.

27 j. Respondent failed to maintain legible written medical records for canine patient  
28 Melody.

1 k. Respondent's medical records for canine patient Melody for November 13, 2014,  
2 and November 18, 2014, failed to include the minimum amount of information required by the  
3 Board.

4 l. Respondent's medical records for canine patient Melody for November 13, 2014,  
5 failed to include a history regarding the presenting problem.

6 m. Respondent's medical records for canine patient Melody for November 13, 2014,  
7 failed to include the results of a physical examination.

8 n. Respondent's medical records for canine patient Melody for November 13, 2014,  
9 failed to include an assessment or diagnosis prior to providing treatment.

10 o. Respondent's medical records for canine patient Melody for November 13, 2014,  
11 failed to include an evaluation of the blood tests and radiographs.

12 p. Respondent's medical records for canine patients Josh, Martine, Dayton, Harrison,  
13 and Sophie for February 8-9, 2017, were not typed and were mostly illegible.

14 q. Respondent did not sign or initial his exam and surgical notes for February 8-9, 2017  
15 for canine patients Josh, Martine, Dayton, Harrison, and Sophie.

16 r. Respondent failed to record the incision location and gas anesthetic route of delivery  
17 for spay/neuter surgeries on or about February 8-9, 2017 for canine patients Josh, Martine, Dayton,  
18 Harrison, and Sophie.

19 s. Respondent failed to provide a legible medical record for canine patient Koal on  
20 January 4, 8, 27, February 1, and May 18, 2016.

21 t. Respondent failed to record into which of canine patient Koal's eyes client E.N. was  
22 to administer the prescribed gentamicin ophthalmic drops on January 4 and 8, 2016.

23 u. Respondent failed to record the route of administration of the five injections canine  
24 patient Koal received on January 4, 2016.

25 v. Respondent failed to provide an adequate surgical description for canine patient  
26 Koal on January 8 and 18, 2016, and February 1, 2016.

27 w. Respondent failed to document directions for use of eye wash and gentamicin  
28 ophthalmic drops sent home with canine patient Koal on January 11, 2016.

1 x. Respondent failed to adequately assess, diagnose, and record his diagnosis prior to  
2 canine patient Koal's surgery on January 18, 2016.

3 y. Respondent failed to record into which of canine patient Koal's eyes client E.N. was  
4 to administer the prescribed Optimmune ophthalmic ointment on January 27, 2016.

5 z. Respondent failed to record the dates that canine patient Koal was in his custody in  
6 February 2016.

7 aa. Respondent failed to record progress/treatment notes for canine patient Koal when  
8 the patient was in his custody in February 2016.

9 bb. Respondent failed to record adequate examination notes on canine patient Koal's  
10 abnormal eye on February 20, 2016.

11 cc. Respondent failed to record suture removal in canine patient Koal's medical record  
12 on May 18, 2016.

13 **SEVENTH CAUSE FOR DISCIPLINE**

14 **(Anesthesia)**

15 75. Complainant refers to, and by this reference incorporates, the allegations set forth  
16 above in paragraphs 18 through 68 as though fully set forth herein. Respondent Haroon Mohiuddin  
17 is subject to disciplinary action under sections 4875 and 4884, subdivision (o) in conjunction with  
18 California Code of Regulations, title 16, section 2032.4, subdivisions (b)(1) and (b)(6), in that  
19 Respondent did not comply with requirements for the administration of anesthesia as follows:

20 a. Respondent failed to perform a physical examination of canine patient Pepper within  
21 12 hours of administering general anesthesia on or about June 15, 2015, and to note the results of  
22 such an examination in the records.

23 b. Respondent failed to record the route and type of anesthesia administered to canine  
24 patient Pepper on or about June 15, 2015.

25 c. Respondent failed to record the route of gas anesthesia during surgery on February  
26 8-9, 2017, in the medical records of canine patients Josh, Martine, Dayton, Harrison, and Sophie.

27 d. Respondent failed to perform a physical examination on canine patient Koal within  
28 12 hours of placing him under anesthesia on January 8, 18, and February 1, 2016.

1 e. Respondent failed to provide the route of administration of Telazol anesthetic for  
2 canine patient Koal's surgery on January 8, 2016.

3 f. Respondent failed to record what anesthetic agent was administered to canine  
4 patient Koal on January 18, 2016, and February 1, 2016.

5 **EIGHTH CAUSE FOR DISCIPLINE**

6 **(Failure to Provide Humane Treatment)**

7 76. Complainant refers to, and by this reference incorporates, the allegations set forth  
8 above in paragraphs 18 through 68 as though fully set forth herein. Respondent Haroon Mohiuddin  
9 is subject to disciplinary action under sections 4875 and 4884, subdivision (o) in conjunction with  
10 California Code of Regulations, title 16, section 2032.05 as follows:

11 a. Respondent failed to provide humane treatment to canine patient Pepper when  
12 Respondent neglected to provide pain medication during a time of injury and following surgical  
13 repair of wounds on or about June 15, 2015.

14 b. Respondent failed to provide pain medication prior, during, or after surgery for  
15 canine patients Josh, Martine, Dayton, Harrison, and Sophie on February 8-9, 2017.

16 c. Respondent failed to provide perioperative pain relief to canine patient Koal on  
17 January 18, 2016.

18 d. Respondent failed to provide perioperative pain relief to canine patient Koal on  
19 February 1, 2016.

20 **NINTH CAUSE FOR DISCIPLINE**

21 **(Assisting and Abetting Violation of a Veterinary Medical Board Regulation)**

22 77. Complainant refers to, and by this reference incorporates, the allegations set forth  
23 above in paragraphs 18 through 68 as though fully set forth herein. Respondent Haroon Mohiuddin  
24 is subject to disciplinary action under sections 4875 and 4883, subdivision (o) in conjunction with  
25 California Code of Regulations, title 16, sections 2035 and 2030, subdivision (c), as follows:

26 a. Respondent allowed an unregistered veterinary assistant to illegally induce anesthesia  
27 on canine patient Koal on January 8, 2016.

1       b. Respondent allowed an unregistered veterinary assistant to execute a task for which he  
2 was unlicensed to perform by sending the assistant to treat animal patient Peppa without  
3 Respondent on or about November 10, 2015.

4       c. Pain medication was prescribed and dispensed to canine patient Kimberly by  
5 someone other than a licensed veterinarian upon discharge from ISA Clinic on or about August 27,  
6 2015. Respondent, as the Licensee Manager, is responsible for ensuring that no unlicensed activity  
7 is occurring on the premises.

#### 8                                   **TENTH CAUSE FOR DISCIPLINE**

##### 9                   **(Failure to Fulfill Duties of a Veterinary Premises Licensee Manager)**

10       78. Complainant refers to, and by this reference incorporates, the allegations set forth  
11 above in paragraphs 18 through 68 as though fully set forth herein. Respondent Haroon Mohiuddin  
12 is subject to disciplinary action under sections 4875 and 4883, subdivision (o) in conjunction with  
13 California Code of Regulations, title 16, section 2030.05, subdivision (c), as follows:

14       a. Respondent failed to ensure that no unlicensed activity occurred at Isa Companion  
15 Animal Clinic on January 8, 2016, when canine patient Koal was anesthetized by an unlicensed  
16 veterinary assistant.

17       b. Respondent failed to ensure that all activities conducted under the premises' name,  
18 whether on or offsite, were legal, when he allowed unlicensed veterinary technician Yuri Rodriguez  
19 to administer oxytocin to animal patient Peppa on November 10, 2015, without first examining and  
20 diagnosing her.

#### 21                                   **DISCIPLINE CONSIDERATION**

22       79. To determine the degree of discipline, Complainant alleges that an Accusation and First  
23 Amended and Supplemental Accusation was filed against Respondent in Case Number 92-3.  
24 Pursuant to the Order, effective November 1, 1993, Respondent's license was revoked, stayed, and  
25 placed was placed on five years of probation pursuant to a Stipulation for Settlement and Order.<sup>13</sup>

26       <sup>13</sup> The circumstances of Case Number 92-3 are as follows: Respondent admitted to the  
27 following conduct, as set forth in the Accusation, in that on or about December 10 – 26, 1987,  
28 Respondent was guilty of negligence, incompetence, gross negligence, and general unprofessional  
conduct in his treatment of feline patient Yang. Respondent failed to take an X-ray when feline



1 PRAYER

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

4 1. Revoking or suspending Veterinarian License Number VET 7124 issued to Haroon  
5 Mohiuddin, DVM;


6 2. Revoking or suspending Veterinary Premise Permit Number HSP 7294 issued to ISA  
7 Companion Animal Clinic, with Haroon Mohiuddin, DVM, as managing licensee;

8 3. Assessing a fine against Haroon Mohiuddin, DVM, and ISA Companion Animal Clinic  
9 not in excess of \$5,000 for any of the causes specified in Business and Professions Code section  
10 4883;

11 4. Ordering Haroon Mohiuddin, DVM, and ISA Companion Animal Clinic to pay the  
12 Veterinary Medical Board the reasonable costs of the investigation and enforcement of this case,  
13 pursuant to Business and Professions Code section 125.3; and,

14 5. Taking such other and further action as deemed necessary and proper.

15  
16 DATED: March 7, 2018

  
ANNEMARIE DEL MUGNAIO  
Executive Officer  
Veterinary Medical Board  
Department of Consumer Affairs  
State of California  
Complainant

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20 LA2016602478  
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21 patient Yang was brought in to confirm his diagnosis of a broken jaw. Respondent delayed fixation  
22 of the fracture for at least four days after the feline patient was brought to his clinic. Respondent  
23 performed surgery on fractures of both mandibles using only two crossed pins, allowed inadequate  
24 time for healing, and left feline patient Yang's jaw unstable. Respondent admitted to the following  
25 conduct, as alleged in First Amended and Supplemental Accusation: Respondent was subject to  
26 disciplinary action for unprofessional conduct, fraud, deception, negligence, and incompetence in  
27 that he took at least ten cats (including feline patients Katy, Sugar, and Molly) without authorization  
28 from their respective owners to the Animal Shelter in Chatsworth, California, where he repeatedly  
and falsely claimed to be the owner of said cats, knowing that the cats would be euthanized. The  
ten cats were euthanized by the Animal Shelter on or about March 8, 1993. Respondent called the  
owner of feline patients Katy, Sugar, and Molly, on or about March 10, 1993 and asked the owner  
to immediately pick up the cats. At the time of the call, Respondent knew or should have known  
the cats were dead. Respondent also admitted to practicing veterinary medicine and operating a  
veterinary office from March 1, 1993 through April 26, 1993, despite knowing that his license was  
expired and not renewed until April 27, 1993.

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*Attorneys for Complainant*

7  
8 **BEFORE THE**  
**VETERINARY MEDICAL BOARD**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

10 In the Matter of the First Amended Accusation  
11 Against:

Case No. 4602016000125

**FIRST AMENDED ACCUSATION**

12 **HAROON MOHIUDDIN**  
13 **ISA Companion Animal Clinic**  
14 **790 E. Main Street**  
**Barstow, CA 92311**

15 **Veterinarian License No. VET 7124**  
**Premises Permit No. HSP 7294**

16 Respondent.

17  
18 Complainant alleges:

19 **PARTIES**

20 1. Annemarie Del Mugnaio (Complainant) brings this First Amended Accusation solely  
21 in her official capacity as the Executive Officer of the Veterinary Medical Board, Department of  
22 Consumer Affairs.

23 2. On or about February 25, 1980, the Veterinary Medical Board issued Veterinarian  
24 License Number VET 7124 to Haroon Mohiuddin (Respondent). The Veterinarian License was in  
25 full force and effect at all times relevant to the charges brought herein and will expire on February  
26 28, 2019, unless renewed.

27 ///

3. On or about September 27, 2013, the Veterinary Medical Board issued a premises license, License No. HSP 7294. The premises license was in full force and effect at all times relevant to the charges brought herein and will expire on May 31, 2018, unless renewed.

## JURISDICTION

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

5. 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 section 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.

6. Section 118(b) of the Code provides, in pertinent part, that the expiration of a license shall not deprive a board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated. Under Business and Professions Code section 4843.5, the Board may renew an expired license at any time within five years after the expiration.

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 4855 of the Code states:

“A veterinarian subject to the provisions of this chapter shall, as required by regulation of the board, keep a written record of all animals receiving veterinary services, and provide a summary of that record to the owner of animals receiving veterinary services, when requested. The minimum amount of information which shall be included in written records and summaries shall be

1 established by the board. The minimum duration of time for which a licensed premise shall retain  
2 the written record or a complete copy of the written record shall be determined by the board.”

3 9. Section 4856 of the Code states:

4 “(a) All records required by law to be kept by a veterinarian subject to this chapter, including,  
5 but not limited to, records pertaining to diagnosis and treatment of animals and records pertaining  
6 to drugs or devices for use on animals, shall be open to inspection by the board, or its authorized  
7 representatives, during an inspection as part of a regular inspection program by the board, or during  
8 an investigation initiated in response to a complaint that a licensee has violated any law or  
9 regulation that constitutes grounds for disciplinary action by the board. A copy of all those records  
10 shall be provided to the board immediately upon request.”

11 10. Section 4883 of the Code states:

12 “The board may deny, revoke, or suspend a license or assess a fine as provided in Section  
13 4875 for any of the following:

14 ...

15 “(g) Unprofessional conduct . . . .

16 ...

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

### 18 REGULATORY PROVISIONS

19 11. California Code of Regulations, title 16, section 2030.05, subdivision (c) states “[t]he  
20 Licensee Manager is responsible for ensuring that no unlicensed activity is occurring within the  
21 premises or in any location where any function of veterinary medicine, veterinary surgery or  
22 veterinary dentistry is being conducted off the premises under the auspices of this premises  
23 license.”

24 12. California Code of Regulations, title 16, section 2032.05, states:

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

27 13. California Code of Regulations, title 16, section 2032.1, states:

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

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

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

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

15              “(3) The veterinarian has assumed responsibility for making medical judgments  
16       regarding the health of the animal and has communicated with the client a course of treatment  
17       appropriate to the circumstance.”

18       14. California Code of Regulations, title 16, section 2032.3, states:

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

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

24               “... .

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

27               “(7) Data, including that obtained by instrumentation, from the physical examination.

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

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

15. California Code of Regulations, title 16, section 2032.4, states:

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

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

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

## COST RECOVERY

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

### FIRST CONSUMER COMPLAINT

17. At the time of the events set forth herein, Respondent was a practicing veterinarian at ISA Companion Animal Clinic in Barstow, California.

18. On or about August 27, 2015, The Humane Society brought canine patient "Kimberly" (later renamed Pandora) to Respondent to be spayed and vaccinated for rabies following her adoption by A.H. on or about August 26, 2015.

19. Upon retrieving animal patient Kimberly from Respondent, A.H. was given a spay and rabies certificate signed by Respondent, pain medication, an Elizabethan Collar (worn to prevent animals from disturbing surgical sites), and written post-operative discharge instructions. The Humane Society was billed for the spay surgical procedure, and A.H. was charged for the pain medication and the Elizabethan Collar.

20. Approximately three days after animal patient Kimberly's discharge, A.H. inspected animal patient Kimberly and could not locate any indication of incision. When confronted, Respondent's office claimed there was a miscommunication and that animal patient Kimberly only received the rabies vaccination because she had previously been spayed.

21. In February 2016, A.H. noticed animal patient Kimberly had enlarged mammary glands. A.H. brought animal patient Kimberly (now Pandora) to another veterinarian. That veterinarian could not locate an incision indicating animal patient Kimberly had ever been spayed, and thus concluded she had not been spayed. The veterinarian conducted exploratory surgery on or around February 8, 2016, and discovered animal patient Kimberly still had her ovaries and uterus, confirming she had not been spayed.

## SECOND CONSUMER COMPLAINT

22. At the time of the events set forth herein, Respondent was a practicing veterinarian at ISA Companion Animal Clinic in Barstow, California.

23. On or about June 12, 2015, Y.C. brought her canine, "Pepper," to ISA Companion Pet Motel for boarding. On or about June 15, 2015, animal patient Pepper was discovered in his pen bleeding profusely from his left front paw and was taken to ISA Companion Animal Clinic next door. Respondent treated the wound and administered an antibiotic injection. Animal patient Pepper was then discharged to Y.C.

24. On or about June 18, 2015, June 22, 2015, and June 26, 2015, Y.C. brought animal patient Pepper to Respondent for follow up visits. Respondent administered Kenalog, a corticosteroid.

25. At no time did Respondent prescribe animal patient Pepper pain medication.

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1 a spay explore on animal patient Sophie.<sup>1</sup> Following the surgeries, the dogs were released back to  
2 the care of Barstow Animal Shelter.

3 33. The Board requested that Respondent submit a copy of all records relating to his  
4 treatment of the five animal patients, as well as a typed copy of the medical records. Respondent  
5 submitted medical records which were handwritten and nearly illegible. In addition to failing to  
6 comply with the Board's request for typed records, Respondent also failed to comply with the  
7 requirement that all physical exam notes and surgical narratives had to be initialed or signed.

8 34. Respondent failed to administer pain medication (analgesic) to any of the animal  
9 patients prior, during, or after surgery.

10 35. Respondent failed to provide adequate surgical descriptions in the five animal patients'  
11 charts. He failed to record the route by which he administered Telazol, an injectable anesthetic.<sup>2</sup>  
12 Respondent also failed to record the incision site of the four neuter operations, and did not clearly  
13 note the route of delivery of gas anesthetic during the five surgeries, as required.

#### 14 FIRST CAUSE FOR DISCIPLINE

##### 15 (Negligence)

16 36. Complainant refers to, and by this reference incorporates, the allegations set forth  
17 above in paragraphs 16 through 34 as though fully set forth herein. Respondent Haroon Mohiuddin  
18 is subject to disciplinary action under section 4883, subdivision (i), in conjunction with California  
19 Code of Regulations, title 16, section 2030.05, subdivision (c), in that Respondent's care was  
20 negligent. The circumstances are as follows:

21 a. Pain medication was prescribed and dispensed to animal patient Kimberly by  
22 someone other than a licensed veterinarian upon discharge from ISA Companion Animal Clinic on  
23 or about August 27, 2015. Respondent, as the Licensee Manager, is responsible for ensuring that  
24 no unlicensed activity is occurring on the premises.

25 b. Respondent failed to provide pain medication to animal patient Pepper during a time  
26

27 <sup>1</sup> A spay explore refers to opening up the abdomen of a female animal to determine if she  
28 was previously spayed, as evidenced by a lack of ovaries and uterus. On February 9, 2017,  
Respondent noted that Sophie did not possess ovaries or a uterus.

<sup>2</sup> Telazol is administered intravenously (IV), under the skin (SC), or in the muscle (IM).

1 of injury and following surgical repair of wounds on or about June 15, 2015.

2 c. Respondent failed to provide pain medication prior, during, or after surgery for  
3 animal patients Josh, Martine, Dayton, Harrison, and Sophie on or about February 8-9, 2017.

4 **SECOND CAUSE FOR DISCIPLINE**

5 **(Unprofessional Conduct)**

6 37. Complainant refers to, and by this reference incorporates, the allegations set forth  
7 above in paragraphs 16 through 34 as though fully set forth herein. Respondent Haroon Mohiuddin  
8 is subject to disciplinary action under section 4883, subdivision (g), in conjunction with California  
9 Code of Regulations, title 16, section 2032.1, subdivision (a), in that Respondent engaged in  
10 unprofessional conduct as follows:

11 a. Respondent failed to establish a veterinarian-patient relationship when he failed to  
12 perform a physical examination on animal patient Kimberly.

13 b. Respondent prescribed medication (Clavamox) to animal patient Kimberly without  
14 establishing a veterinarian-patient relationship.

15 c. Respondent administered a rabies vaccine to animal patient Kimberly without  
16 establishing a veterinarian-patient relationship.

17 d. Respondent treated animal patient Melody on or about November 13, 2014, without  
18 establishing a veterinarian-patient relationship.

19 e. Respondent treated animal patient Melody on or about November 13, 2014, without  
20 performing a physical examination.

21 **THIRD CAUSE FOR DISCIPLINE**

22 **(Incompetence)**

23 38. Complainant refers to, and by this reference incorporates, the allegations set forth  
24 above in paragraphs 16 through 20 as though fully set forth herein. Respondent Haroon Mohiuddin  
25 is subject to disciplinary action under section 4883, subdivision (i), in that Respondent  
26 demonstrated incompetence due to his failure to perform veterinary medicine in a manner  
27 consistent with current veterinary medical practice. The circumstances are that Respondent  
28 displayed a lack of minimal knowledge of rabies vaccination protocols associated with his

1 professional obligations when he signed the certificate stating that animal patient Kimberly's next  
2 rabies vaccination was due three years later.

3 **FOURTH CAUSE FOR DISCIPLINE**

4 **(Deception)**

5 39. Complainant refers to, and by this reference incorporates, the allegations set forth  
6 above in paragraphs 16 through 20 as though fully set forth herein. Respondent Haroon Mohiuddin  
7 is subject to disciplinary action under section 4883, subdivision (i), in that Respondent deceived  
8 A.H. into believing animal patient Kimberly had been spayed when Respondent signed a document  
9 intended to cause the reader to believe animal patient Kimberly had been spayed, when in fact she  
10 had not.

11 **FIFTH CAUSE FOR DISCIPLINE**

12 **(Fraud)**

13 40. Complainant refers to, and by this reference incorporates, the allegations set forth  
14 above in paragraphs 16 through 20 as though fully set forth herein. Respondent Haroon Mohiuddin  
15 is subject to disciplinary action under section 4883, subdivision (i), in that Respondent committed  
16 fraud when Respondent misled A.H. to believe animal patient Kimberly had been spayed, for which  
17 The Humane Society was charged, when she had not been spayed and caused A.H. to pay for an  
18 unnecessary prescription for pain medication and an Elizabethan Collar.

19 **SIXTH CAUSE FOR DISCIPLINE**

20 **(Inadequate Record Keeping)**

21 41. Complainant refers to, and by this reference incorporates, the allegations set forth  
22 above in paragraphs 16 through 34 as though fully set forth herein. Respondent Haroon Mohiuddin  
23 and ISA Companion Animal Clinic are subject to disciplinary action under sections 4855, 4856,  
24 and 4883, subdivision (g), in conjunction with California Code of Regulations, title 16, section  
25 2032.3, subdivisions (a), (a)(1), (a)(6), (a)(7), (a)(8), and (a)(10), in that Respondent failed to  
26 properly keep records as follows:

27 a. Respondent failed to maintain legible written medical records for animal patient  
28 Kimberly.

1           b.       Respondent failed to document the administration of a rabies vaccine to animal  
2 patient Kimberly in the medical record.

3           c.       Respondent failed to record the name of the antibiotic given to animal patient Pepper  
4 on or about June 15, 2015, as well as the route of administration.

5           d.       Respondent failed to include the name or initials of the person responsible for  
6 medical record entry for animal patient Pepper on or about June 18, 2015.

7           e.       Respondent failed to include the route by which the injections were given to animal  
8 patient Pepper on or about June 18, 2015.

9           f.       Respondent failed to include the name or initials of the person responsible for  
10 medical record entry for animal patient Pepper on or about June 22, 2015.

11          g.       Respondent failed to include the name or initials of the person responsible for  
12 medical record entry for animal patient Pepper on or about June 26, 2015.

13          h.       Respondent failed to maintain records for medical care provided to animal patient  
14 Melody on February 15, 2014, and June 2, 2014.

15          i.       Respondent failed to provide medical records for animal patient Melody upon  
16 request of the Board.

17          j.       Respondent failed to maintain legible written medical records for animal patient  
18 Melody.

19          k.       Respondent's medical records for animal patient Melody for November 13, 2014,  
20 and November 18, 2014, failed to include the minimum amount of information required by the  
21 Board.

22          l.       Respondent's medical records for animal patient Melody for November 13, 2014,  
23 failed to include a history regarding the presenting problem.

24          m.       Respondent's medical records or animal patient Melody for November 13, 2014,  
25 failed to include the results of a physical examination.

26          n.       Respondent's medical records for animal patient Melody for November 13, 2014,  
27 failed to include an assessment or diagnosis prior to providing treatment.  
28

o. Respondent's medical records for animal patient Melody for November 13, 2014, failed to include an evaluation of the blood tests and radiographs.

p. Respondent's medical records for animal patients Josh, Martine, Dayton, Harrison, and Sophie for February 8-9, 2017, were not typed and were mostly illegible.

q. Respondent did not sign or initial his exam and surgical notes for February 8-9, 2017 for animal patients Josh, Martine, Dayton, Harrison, and Sophie.

r. Respondent failed to record the incision location and gas anesthetic route of delivery for spay/neuter surgeries on or about February 8-9, 2017 for animal patients Josh, Martine, Dayton, Harrison, and Sophie.

#### **SEVENTH CAUSE FOR DISCIPLINE**

##### **(Anesthesia)**

42. Complainant refers to, and by this reference incorporates, the allegations set forth above in paragraphs 21 through 34 as though fully set forth herein. Respondent Haroon Mohiuddin is subject to disciplinary action under California Code of Regulations, title 16, section 2032.4, subdivisions (b)(1) and (b)(6), in that Respondent did not comply with requirements for the administration of anesthesia as follows:

a. Respondent failed to perform a physical examination of animal patient Pepper within 12 hours of administering general anesthesia on or about June 15, 2015, and to note the results of such an examination in the records.

b. Respondent failed to record the route and type of anesthesia administered to animal patient Pepper on or about June 15, 2015.

c. Respondent failed to record the route of gas anesthesia during surgery on February 8-9, 2017, in the medical records of animal patients Josh, Martine, Dayton, Harrison, and Sophie.

#### **EIGHTH CAUSE FOR DISCIPLINE**

##### **(Failure to Provide Humane Treatment)**

43. Complainant refers to, and by this reference incorporates, the allegations set forth above in paragraphs 21 through 34 as though fully set forth herein. Respondent Haroon Mohiuddin

1 is subject to disciplinary action under California Code of Regulations, title 16, section 2032.05 as  
2 follows:

3 a. Respondent failed to provide humane treatment to animal patient Pepper when  
4 Respondent neglected to provide pain medication during a time of injury and following surgical  
5 repair of wounds on or about June 15, 2015.

6 b. Respondent failed to provide pain medication prior, during, or after surgery for  
7 animal patients Josh, Martine, Dayton, Harrison, and Sophie on February 8-9, 2017.

### 8 DISCIPLINE CONSIDERATION

9 44. To determine the degree of discipline, Complainant alleges that an Accusation and First  
10 Amended and Supplemental Accusation was filed against Respondent in Case Number 92-3.  
11 Pursuant to the Order, effective November 1, 1993, Respondent's license was revoked, stayed, and  
12 placed was placed on five years of probation pursuant to a Stipulation for Settlement and Order.<sup>3</sup>

### 13 PRAYER

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

16 1. Revoking or suspending Veterinarian License Number VET 7124 issued to Haroon  
17 Mohiuddin, DVM;

18  
19 <sup>3</sup> The circumstances of Case Number 92-3 are as follows: Respondent admitted to the  
20 following conduct, as set forth in the Accusation, in that on or about December 10 – 26, 1987,  
21 Respondent was guilty of negligence, incompetence, gross negligence, and general unprofessional  
22 conduct in his treatment of feline patient Yang. Respondent failed to take an X-ray when feline  
23 patient Yang was brought in to confirm his diagnosis of a broken jaw. Respondent delayed fixation  
24 of the fracture for at least four days after the feline patient was brought to his clinic. Respondent  
25 performed surgery on fractures of both mandibles using only two crossed pins, allowed inadequate  
26 time for healing, and left feline patient Yang's jaw unstable. Respondent admitted to the following  
27 conduct, as alleged in First Amended and Supplemental Accusation: Respondent was subject to  
28 disciplinary action for unprofessional conduct, fraud, deception, negligence, and incompetence in  
that he took at least ten cats (including feline patients Katy, Sugar, and Molly) without authorization  
from their respective owners to the Animal Shelter in Chatsworth, California, where he repeatedly  
and falsely claimed to be the owner of said cats, knowing that the cats would be euthanized. The  
ten cats were euthanized by the Animal Shelter on or about March 8, 1993. Respondent called the  
owner of feline patients Katy, Sugar, and Molly, on or about March 10, 1993 and asked the owner  
to immediately pick up the cats. At the time of the call, Respondent knew or should have known  
the cats were dead. Respondent also admitted to practicing veterinary medicine and operating a  
veterinary office from March 1, 1993 through April 26, 1993, despite knowing that his license was  
expired and not renewed until April 27, 1993.

2. Revoking or suspending Veterinary Premise Permit Number HSP 7294 issued to ISA Companion Animal Clinic, with Haroon Mohiuddin, DVM, as managing licensee;

3. Assessing a fine against Haroon Mohiuddin, DVM, and ISA Companion Animal Clinic not in excess of \$5,000 for any of the causes specified in Business and Professions Code section 4883;

4. Ordering Haroon Mohiuddin, DVM, and ISA Companion Animal Clinic to pay the Veterinary Medical Board the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and,

5. Taking such other and further action as deemed necessary and proper.

DATED:

October 24, 2017



ANNEMARIE DEL MUGNAIO  
Executive Officer  
Veterinary Medical Board  
Department of Consumer Affairs  
State of California  
*Complainant*

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7  
8 **BEFORE THE**  
**VETERINARY MEDICAL BOARD**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:

Case No. 4602016000125

11 **HAROON MOHIUDDIN**  
12 **790 E. Main Street**  
13 **Barstow, CA 92311**

**A C C U S A T I O N**

14 **Veterinarian License No. VET 7124**

15 Respondent.

16  
17 Complainant alleges:

18 **PARTIES**

19 1. Annemarie Del Mugnaio (Complainant) brings this Accusation solely in her official  
20 capacity as the Executive Officer of the Veterinary Medical Board, Department of Consumer  
21 Affairs.

22 2. On or about February 25, 1980, the Veterinary Medical Board issued Veterinarian  
23 License Number VET 7124 to Haroon Mohiuddin (Respondent). The Veterinarian License was  
24 in full force and effect at all times relevant to the charges brought herein and will expire on  
25 February 28, 2019, unless renewed.

26 ///

27 ///

28 ///



**JURISDICTION**

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

4. 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 section 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.

5. Section 118(b) of the Code provides, in pertinent part, that the expiration of a license shall not deprive a board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated. Under Business and Professions Code section 4843.5, the Board may renew an expired license at any time within five years after the expiration.

6. 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**

7. Section 4883 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:

...

"(g) Unprofessional conduct . . . .

...

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

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**REGULATORY PROVISIONS**

8. California Code of Regulations, title 16, section 2030.05, subdivision (c) states “[t]he Licensee Manager is responsible for ensuring that no unlicensed activity is occurring within the premises or in any location where any function of veterinary medicine, veterinary surgery or veterinary dentistry is being conducted off the premises under the auspices of this premises license.”

9. California Code of Regulations, title 16, section 2032.05, states:

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

10. California Code of Regulations, title 16, section 2032.1, 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

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

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1 11. California Code of Regulations, title 16, section 2032.3, states:

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

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

7 ...

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

10 12. California Code of Regulations, title 16, section 2032.4, states:

11 "(b) When administering general anesthesia, a veterinarian shall comply with the following  
12 standards:

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

17 ...

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

21 **COST RECOVERY**

22 13. Section 125.3 of the Code provides, in pertinent part, that the Board may request the  
23 administrative law judge to direct a licentiate found to have committed a violation or violations of  
24 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
25 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being  
26 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be  
27 included in a stipulated settlement.

28 ///

1 **FIRST CONSUMER COMPLAINT**

2 14. At the time of the events set forth herein, Respondent was a practicing veterinarian at  
3 ISA Companion Animal Clinic in Barstow, California.

4 15. On or about August 27, 2015, The Humane Society brought canine patient  
5 "Kimberly" (later renamed Pandora) to Respondent to be spayed and vaccinated for rabies  
6 following her adoption by A.H. on or about August 26, 2015.

7 16. Upon retrieving animal patient Kimberly from Respondent, A.H. was given a spay  
8 and rabies certificate signed by Respondent, pain medication, an Elizabethan Collar (worn to  
9 prevent animals from disturbing surgical sites), and written post-operative discharge instructions.  
10 The Humane Society was billed for the spay surgical procedure, and A.H. was charged for the  
11 pain medication and the Elizabethan Collar.

12 17. Approximately three days after animal patient Kimberly's discharge, A.H. inspected  
13 animal patient Kimberly and could not locate any indication of incision. When confronted,  
14 Respondent's office claimed there was a miscommunication and that animal patient Kimberly  
15 only received the rabies vaccination because she had previously been spayed.

16 18. In February 2016, A.H. noticed animal patient Kimberly had enlarged mammary  
17 glands. A.H. brought animal patient Kimberly (now Pandora) to another veterinarian. That  
18 veterinarian could not locate an incision indicating animal patient Kimberly had ever been spayed,  
19 and thus concluded she had not been spayed. The veterinarian conducted exploratory surgery on  
20 or around February 8, 2016, and discovered animal patient Kimberly still had her ovaries and  
21 uterus, confirming she had not been spayed.

22 **SECOND CONSUMER COMPLAINT**

23 19. At the time of the events set forth herein, Respondent was a practicing veterinarian at  
24 ISA Companion Animal Clinic in Barstow, California.

25 20. On or about June 12, 2015, Y.C. brought her canine, "Pepper," to ISA Companion Pet  
26 Motel for boarding. On or about June 15, 2015, animal patient Pepper was discovered in his pen  
27 bleeding profusely from his left front paw and was taken to ISA Companion Animal Clinic next  
28

1 door. Respondent treated the wound and administered an antibiotic injection. Animal patient  
2 Pepper was then discharged to Y.C.

3 21. On or about June 18, 2015, June 22, 2015, and June 26, 2015, Y.C. brought animal  
4 patient Pepper to Respondent for follow up visits. Respondent administered Kenalog, a  
5 corticosteroid.

6 22. At no time did Respondent prescribe animal patient Pepper pain medication.

7 **FIRST CAUSE FOR DISCIPLINE**

8 **(Negligence)**

9 23. Complainant refers to, and by this reference incorporates, the allegations set forth  
10 above in paragraphs 14 through 22 as though fully set forth herein. Respondent Haroon  
11 Mohiuddin is subject to disciplinary action under section 4883, subdivision (i), in conjunction  
12 with California Code of Regulations, title 16, section 2030.05, subdivision (c), in that  
13 Respondent's care was negligent. The circumstances are as follows:

14 a. Pain medication was prescribed and dispensed to animal patient Kimberly by  
15 someone other than a licensed veterinarian upon discharge from ISA Companion Animal Clinic  
16 on or about August 27, 2015. Respondent, as the Licensee Manager, is responsible for ensuring  
17 that no unlicensed activity is occurring on the premises.

18 b. Respondent failed to provide pain medication to animal patient Pepper during a  
19 time of injury and following surgical repair of wounds on or about June 15, 2015.

20 **SECOND CAUSE FOR DISCIPLINE**

21 **(Unprofessional Conduct)**

22 24. Complainant refers to, and by this reference incorporates, the allegations set forth  
23 above in paragraphs 14 through 18 as though fully set forth herein. Respondent Haroon  
24 Mohiuddin is subject to disciplinary action under section 4883, subdivision (g), in conjunction  
25 with California Code of Regulations, title 16, section 2032.1, subdivision (a), in that Respondent  
26 engaged in unprofessional conduct as follows:

27 a. Respondent failed to establish a veterinarian-patient relationship when he failed  
28 to perform a physical examination on animal patient Kimberly.

1           b.     Respondent prescribed medication (Clavamox) to animal patient Kimberly  
2 without establishing a veterinarian-patient relationship.

3           c.     Respondent administered a rabies vaccine to animal patient Kimberly without  
4 establishing a veterinarian-patient relationship.

5                               **THIRD CAUSE FOR DISCIPLINE**

6                                       **(Incompetence)**

7           25.    Complainant refers to, and by this reference incorporates, the allegations set forth  
8 above in paragraphs 14 through 18 as though fully set forth herein. Respondent Haroon  
9 Mohiuddin is subject to disciplinary action under section 4883, subdivision (i), in that Respondent  
10 demonstrated incompetence due to his failure to perform veterinary medicine in a manner  
11 consistent with current veterinary medical practice. The circumstances are that Respondent  
12 displayed a lack of minimal knowledge of rabies vaccination protocols associated with his  
13 professional obligations when he signed the certificate stating that animal patient Kimberly's next  
14 rabies vaccination was due three years later.

15                               **FOURTH CAUSE FOR DISCIPLINE**

16                                       **(Deception)**

17           26.    Complainant refers to, and by this reference incorporates, the allegations set forth  
18 above in paragraphs 14 through 18 as though fully set forth herein. Respondent Haroon  
19 Mohiuddin is subject to disciplinary action under section 4883, subdivision (i), in that Respondent  
20 deceived A.H. into believing animal patient Kimberly had been spayed when Respondent signed a  
21 document intended to cause the reader to believe animal patient Kimberly had been spayed, when  
22 in fact she had not.

23                               **FIFTH CAUSE FOR DISCIPLINE**

24                                       **(Fraud)**

25           27.    Complainant refers to, and by this reference incorporates, the allegations set forth  
26 above in paragraphs 14 through 18 as though fully set forth herein. Respondent Haroon  
27 Mohiuddin is subject to disciplinary action under section 4883, subdivision (i), in that Respondent  
28 committed fraud when Respondent misled A.H. to believe animal patient Kimberly had been

1 spayed, for which The Humane Society was charged, when she had not been spayed and caused  
2 A.H. to pay for an unnecessary prescription for pain medication and an Elizabethan Collar.

3 **SIXTH CAUSE FOR DISCIPLINE**

4 **(Inadequate Record Keeping)**

5 28. Complainant refers to, and by this reference incorporates, the allegations set forth  
6 above in paragraphs 14 through 22 as though fully set forth herein. Respondent Haroon  
7 Mohiuddin is subject to disciplinary action under section 4883, subdivision (g), in conjunction  
8 with California Code of Regulations, title 16, section 2032.3, subdivisions (a), (a)(1), and (a)(8),  
9 in that Respondent failed to properly keep records as follows:

10 a. Respondent failed to maintain legible written medical records for animal patient  
11 Kimberly.

12 b. Respondent failed to document the administration of a rabies vaccine to animal  
13 patient Kimberly in the medical record.

14 c. Respondent failed to record the name of the antibiotic given to animal patient  
15 Pepper on or about June 15, 2015, as well as the route of administration.

16 d. Respondent failed to include the name or initials of the person responsible for  
17 medical record entry for animal patient Pepper on or about June 18, 2015.

18 e. Respondent failed to include the route by which the injections were given to  
19 animal patient Pepper on or about June 18, 2015.

20 f. Respondent failed to include the name or initials of the person responsible for  
21 medical record entry for animal patient Pepper on or about June 22, 2015.

22 g. Respondent failed to include the name or initials of the person responsible for  
23 medical record entry for animal patient Pepper on or about June 26, 2015.

24 **SEVENTH CAUSE FOR DISCIPLINE**

25 **(Anesthesia)**

26 29. Complainant refers to, and by this reference incorporates, the allegations set forth  
27 above in paragraphs 19 through 22 as though fully set forth herein. Respondent Haroon  
28 Mohiuddin is subject to disciplinary action under California Code of Regulations, title 16, section

2032.4, subdivisions (b)(1) and (b)(6), in that Respondent did not comply with requirements for the administration of anesthesia as follows:

a. Respondent failed to perform a physical examination of animal patient Pepper within 12 hours of administering general anesthesia on or about June 15, 2015, and to note the results of such an examination in the records.

b. Respondent failed to record the route and type of anesthesia administered to animal patient Pepper on or about June 15, 2015.

**EIGHTH CAUSE FOR DISCIPLINE**

**(Failure to Provide Humane Treatment)**

30. Complainant refers to, and by this reference incorporates, the allegations set forth above in paragraphs 19 through 22 as though fully set forth herein. Respondent Haroon Mohiuddin is subject to disciplinary action under California Code of Regulations, title 16, section 2032.05 in that Respondent failed to provide humane treatment to animal patient Pepper when Respondent neglected to provide pain medication during a time of injury and following surgical repair of wounds on or about June 15, 2015.

**PRAAYER**

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

1. Revoking or suspending Veterinarian License Number VET 7124 issued to Haroon Mohiuddin;

2. Assessing a fine against Haroon Mohiuddin not in excess of \$5,000 for any of the causes specified in Business and Professions Code section 4883;

3. Ordering Haroon Mohiuddin to pay the Veterinary Medical Board the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and,

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4. Taking such other and further action as deemed necessary and proper.

DATED:

January 27, 2017

Annemarie Del Mignaisio  
ANNEMARIE DEL MIGNAISO

ANNEMARIE DEL MUGNAIO  
Executive Officer  
Veterinary Medical Board  
Department of Consumer Affairs  
State of California  
*Complainant*

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## EXHIBIT 4

**CLEAR FORM**



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



## 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.

<b>TYPE OF PETITION</b> [Reference Business and Professions Code section 4887]		
<input checked="" type="checkbox"/> Reinstatement of Revoked/Surrendered License or Registration	<input type="checkbox"/> Modification of Probation	<input type="checkbox"/> Termination of Probation
<p><b>NOTE:</b> 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.</p>		
<b>PERSONAL INFORMATION</b>		
NAME: First Middle Last		
HAROON MOHIUDDIN		
Other name(s) licensed under, if any:		
HOME ADDRESS: Number & Street City State Zip		
[REDACTED]		
HOME TELEPHONE NUMBER	WORK TELEPHONE NUMBER	CELL NUMBER
[REDACTED]	( )	( )
E-mail address:		CA License or Registration Number
NONE		VET7124
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		
<b>ATTORNEY INFORMATION</b> (If Applicable)		
Will you be represented by an attorney? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes (If "Yes," please provide the following information)		
NAME: WILLIAM A. FRANCIS		
ADDRESS: 1484 N. ALTADENA DR., PASADENA, CA 91107		
PHONE: [REDACTED]		
<b>DISCIPLINARY INFORMATION</b>		
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? <input checked="" type="checkbox"/> No <input type="checkbox"/> 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: 38

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

I attach the record of 47 hours of continued education that I have completed in the last year of my suspension and incorporate them by reference.

**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:

I am not working at any other job nor have I since I left the ARK job in April of 2019.

**EMPLOYMENT HISTORY (list for the past 5 years only)**

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

Isa Companion Animal Clinic, 790 E. Main St., Barstow, CA 92311, 760-256-1649, Veterinarian 2014-July 2018. In connection with Isa I reviewed files of animals I worked on and I showed the results on the document attached.

ARK Animal Hospital, 15714 Bear Valley Rd., Victorville, CA 92395, 760-245-7300

Veterinarian, Nov. 2018 - April 12, 2019

In connection w/ARK I reviewed files of animals that I performed services and list the results in the attachment attached hereto.

**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.

I have attended numerous education courses as described and attached under CONTINUING EDUCATION set forth above in Veterinary medicine I attach a list of subject matter of each course. During the short period before my suspension from the practice I provided free consultations through ARK Animal Hospital of cases that it became aware of. After my suspension I have not provided my opinion on animal conditions.

## CURRENT COMPLIANCE

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

1. Been placed on criminal probation or parole? ☐ Yes ☒ No
2. Been charged in any pending criminal action by any state, local or federal agency or court? ☐ Yes ☒ No
3. Been convicted of any criminal offense? (A conviction includes a no contest plea; disregard traffic offenses with a \$100 fine or less.) ☐ Yes ☒ No
4. Been charged or disciplined by any other veterinary board? ☐ Yes ☒ No
5. Surrendered your license to any other veterinary board? ☐ Yes ☒ No
6. Had your licensee manager's premise permit disciplined? ☐ Yes ☒ No
7. Had any civil malpractice claims filed against you of \$10,000 or more? ☐ Yes ☒ No
8. Become addicted to the use of narcotics or controlled substances? ☐ Yes ☒ No
9. Become addicted to or received treatment for the use of alcohol? ☐ Yes ☒ No
10. Been hospitalized for alcohol or drug problems or for mental illness? ☐ Yes ☒ 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? 41,703.75

When is payment anticipated? Because of not being employed over the last 3 years, I request that the Board, upon reinstatement, allow me to pay off the amount owed at \$2,000/mo.

## DECLARATION

Executed on APR. 21 2023, at PASADENA CA  
LA (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.

My signature by fax or e-mail shall be deemed my original signature.

HAROON MOHIUDDIN

Petitioner (print name)

Haron M  
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

**ATTACHMENT TO**  
**EMPLOYMENT HISTORY**  
**RE: NARRATIVE STATEMENT OF**  
**HAROON MOHIUDDIN**

Dear Board,

As you are aware I obtained my Veterinarian License by being taught by Veterinary Doctors in actual practice and learned from them how to appropriately treat the animals that came in for their care. With that teaching I was able to pass the Veterinary License Test and practiced in this field for approximately 38 years before my suspension.

I know that my chosen field of work that I've done for those 38 years can still be done by me professionally under the rules and law that would govern my future practice and I ask for reinstatement.

I acknowledge that I'm not a very readable writer and would see to it that the records I need to keep on animal care would be read and improved by secretarial help so they would be readable.

You have asked for a factual description of each of the six consumer complaints brought against me. My response is as follows:

**FIRST CONSUMER COMPLAINT**

I actually don't recall anything about this. I do know that the ISA Hospital in August of 2015 was extremely busy and I believe I was working 6 days per week at that time because of all the operations I was conducting for regular patients and animals brought in by the Humane Society. The Humane Society was bringing in animals on approximately 4 days per week.

Paperwork for the animals I worked on was done by the secretaries (3 - 5) that worked there at the time and presented to me to sign which I assume was correctly done because of the procedures that were in place.

It appears from the charge that someone at ISA miscommunicated about the canine having been previously spayed.

///

///

SECOND CONSUMER COMPLAINT

The owner of ISA had a dog grooming business next to the animal clinic. He brought in this canine from next door and I took care of the animal's laceration and apparently followed up over the next 2 weeks. The dog survived and the owner of ISA made the arrangements with the owner of the dog about pain medication.

THIRD CONSUMER COMPLAINT

Again, I do not recall this canine or this event. If I responded to this Board inquiry I responded with what was in the file. I did not put away medical records or statements, the staff did.

FOURTH CONSUMER COMPLAINT

I do not recall this matter. My writing is not good. However, I will either print or type all future reports now after it has become an issue over the 38 years I practiced in this field.

If I submitted the requested documents I apologize for not having them typed. From what has been said so far, I need to spend more time on the administrative matters of my practice and be more careful about such matters.

FIFTH CONSUMER COMPLAINT

Without knowing the breed of KOAL, I do not recall this matter. From what I gather from this complaint I did a lot of work on this dog which is work I have done over my 38 years of practice. Most always I wrote my reports and only on a few occasions would type. So, since there were typed reports the differences between the written and typed reports were more likely than not, clerical.

The healing process to remove sutures would have been 2 weeks. Why the owner didn't bring the canine back for them to be removed is unknown.

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1 The skin being messed up on his elbow is unusual but with an Elizabethan Collar that he  
2 apparently didn't like you can understand that in his attempts to get it off he could have taken  
3 fur off his elbows.

4 ISA Clinic, to my knowledge was Yuri Rodriguez. He wasn't just an employee. He  
5 sometimes took it upon himself to give anesthetic to animals. Sometime in extreme  
6 circumstances like an animal might die he would give the anesthetic which I might be bringing  
7 for the animal.  
8

9 SIXTH CONSUMER COMPLAINT

10 I WAS NOT THERE AND DIDN'T KNOW ABOUT IT UNTIL THE BOARD'S  
11 INQUIRY. It is true that sometimes we made joint calls when the circumstances warranted it.  
12 But those times was not this time.

13 In the approximately 5 years I worked for ISA I saved the lives, their legs and bones of  
14 approximately 50 dogs that I operated on and never lost one of those dogs.  
15

16 I know I am an excellent surgeon and will work tirelessly to correct those parts of my  
17 practice that the Board has found fault with.

18 Specific questions for my narrative statement were:

19 a. "During the period of time that your license has been revoked or surrendered, how  
20 have you earned a living?"

21 ANSWER: I already answered this question that I am not working for pay and  
22 haven't since April 12, 2019. I have lived on social security that I receive and  
23 savings.  
24

25 b. "What aspect of your rehabilitation do you feel will protect against the recurrence of  
26 your prior contract?"  
27  
28

ANSWER: As stated in my Petition, I need to be much more careful in my writing and having that typed by the secretaries most animal hospitals have to do that work I also need to review what is written about an animal so that it's consistent and truthful. I intend to follow through with that as an important part of my practice.

c. "What are your plans if your license is reinstated?"

ANSWER: I intend to practice Veterinarian Medicine by being employed by an animal hospital. I am an excellent surgeon as referenced by my colleagues who know me and their recommendations are attached to the Petition.

d. "Where will you practice?"

ANSWER: As stated by Pavel Shimko, he is offering me a job and I will take it as a Veterinarian. The address is Ark Animal Hospital, 15714 Bear Valley Road, Victorville, CA 92395.

With my reinstatement, I have asked the Board to allow me to pay the \$41,703.75 in amounts of \$2,000.00 per month since I've not been employed for over three years.

Thank you for your consideration.

If called as a witness, I would testify on my own knowledge as to the matters set forth above.

I hereby declare, under penalty of perjury pursuant to the laws of the state of California that the foregoing is true and correct.

Executed APRIL 11, 2023, at PASADENA, California.

My signature by fax or email shall  
Be deemed my original signature.

HAROON MOHIUDDIN  
HAROON MOHIUDDIN

## EXHIBIT 6

VETERINARY MEDICAL BOARD  
HAROON MOHIUDDIN'S REQUEST FOR REINSTATEMENT  
VET 7124

**ATTACHMENT TO**  
**EMPLOYMENT HISTORY**

a. Isa Companion, Barstow, CA 2014 – 2018

Following Major Surgeries and Reconstructive Orthopedic Lifesaving. Leg saving,  
bone saving work.

Performed by only Dr. Haroon

Help Mr. Yury & Ms. Marie

- K9, 30 – 40 limping dogs, back legs
  - Few years, 7 – 8 years
  - 15 – 20 lbs, 30 – 100 lbs.
- ACL, torn ligament
- Recheck, re-bandage every week
- After 4, 6, 8 weeks, normal recovery 100%
  
- K9, Tony, 60 lbs, 6 -8 Years male,
  - Entire Prepuce
  - Cancerous
  - Dr. Haroon Performed Prepusectomy (2 hrs)
  - Remove entire prepuce
  - Amputate ½ OS Penis
  - Performed urethrostomy
  - 2 – 3 weeks after surgery
    - Normal life for 1 year
  - Last 2 months
    - Cyclophosphamide
    - 10 mg, 1 – 2 times a week
- Newberry Springs, K9 med hair, black
  - Fractured skull & Multiple pelvic floor fracture, Went to Victorville emergency
  - Vet suggest put him to sleep
  - Came to ISA clinic

VETERINARY MEDICAL BOARD  
HAROON MOHIUDDIN'S REQUEST FOR REINSTATEMENT  
VET 7124

- Shock and coma
- Stabilize for 2 – 3 days
- Small forehead
- Pere, ocular, periorbital anea, some neurological deficit
- Performed surgery 2 – 3 times
- 1 – 2 months after surgery, normal recovery
- 6 months – 1 year later came to ISA, normal recovery
- Frank Karrelo
  - Mix, 40 lb, 1 – 2 years
  - Anuria, U.O, 2 days
  - Urinary catheter. Pass only ½ obstruction
  - Radiological Eval. Shows fractured OS Penis
  - Performed urethrostomy (urine diversion)
  - 2 – 3 months after surgery, Normal life
- Mr. Steve
  - K9 Yellow lab, 70 lbs, few years old
  - Limping on front leg
  - Carpal Luxation
  - Anesthetic, splint for 3 weeks
  - Normal recovery
- Mr. Randy
  - K9 Chesapeake Bay Retriever
  - Swollen neck, unable to drink
  - Thyroid carcinoma
- Bowling alley pet
  - K9 Golden retriever, 70 lbs, 10 years
  - Severe congestive heart failure, panting, gasping
  - Cyanotic Tongue
  - Emergency
  - IV Lasix, Valium, 10 – 15 mg. IV, Oxygen
  - Repeat 2 -3 times
  - Went home with prescription, 1 – 2 years
- Arizona, Angela green
  - K9, 70 lbs, few years
  - Emergency
  - Gastric Dilatation
  - Surgical Procedure
  - 2 – 3 times, 4 – 6 weeks
  - Normal life
- K9 Pitbull, Brown, 70 lbs, 8 – 9 years
  - Testicular Metastatic Tumor
  - After surgery 2 – 3 months, later abdominal effusion

Orthopedic, Reconstructive

- Mr. Randy
  - K9 Front leg limping

VETERINARY MEDICAL BOARD  
HAROON MOHIUDDIN'S REQUEST FOR REINSTATEMENT  
VET 7124

- Nelson, Bull terrier, white, 60 -- 70 lbs, from Las Vegas
- Anesthetic, I/M Rod, Bandage, 4 -- 6 weeks
- Radiograph, Bone healed
- Normal Recovery
- Dr. Dan William
  - K9, yorkie, few years, 10 -- 12 lbs.
  - Fractured Radius & Ulna
  - Anesthetic, I/M rod
  - 6 -- 8 weeks, bone healed
- K9 Miniature Pincher
  - 6 -7 years
  - Limping
  - Name - L. Cuppon
  - Other Vet, Salter Fracture, Physeal (Growth plate), Kirshner Pin Wire
  - Anesthetic, Removed Kirshner pin
- Mr. Phil
  - K9 Rottweiler, 100 - 150 lbs, few years
  - Back two legs, Unable to stand or walk for 1 week
  - Radiological, Hip, Cervical Thoracic Lumbar, vertebrae
  - Disc Syndrome, Discompondyleitis
  - 5 -- 7 Days treatment. Stand & Walk on back 2 legs, prescription
- Ms. Diane
  - K9, 70 lbs, 8 -9 years, Sheppard
  - Caudal G.I Foreign body
  - Rawhide
  - Enterostomy
  - 2 -- 3 weeks, normal recovery
- Matthew
  - K9, Mastiff, 100 -- 150 lbs
  - Cranial Foreign Body
  - Helped Mr. Raul
  - Enterostomy
  - 2 -- 3 weeks, after surgery, normal recovery

VETERINARY MEDICAL BOARD  
HAROON MOHIUDDIN'S REQUEST FOR REINSTATEMENT  
VET 7124

b. Ark Animal Hospital , Victorville, 2018 – April 12, 2019

- K9, Limping, back leg, 60 – 70 lbs, few years old
  - Orthopedic Consultation
  - Other vet, Surgery performed 6 months – 1 year ago.
  - Dog was limping for several months
  - Orthopedic Consultation
  - Radiology Eval. Bone plate & Screws, Buried with bone callous
  - Suggestion from Dr. Haroon, remove entire bone plate & screws
  - 1 – 2 months after removal, normal recovery
- Anatolian Sheppard, lucerne valley

- All 4 legs, unable to stand or walk. 100 lbs. 6 – 7 years
- Cauda Equina & other fully recovered

- K9, Doxi. 15 years. Perineal Hernia
  - Performed surgery for hernia
  - 4 – 6 weeks. normal recovery

## EXHIBIT 7

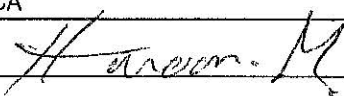


# CERTIFICATE OF ATTENDANCE

**Haroon Mohiuddin, DVM**  
15714 Bear Valley Road  
Victorville, CA 92395  
United States

**94th Annual Conference**  
**March 5-9, 2022**

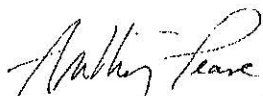
AAVSB-RACE Provider #20-898991  
45 CE hours of Veterinary Continuing Education  
were presented via lectures and interactive sessions by  
WVC in Mandalay Bay Convention Center, Las Vegas, NV

State of Licensure: CA License #(s): 7124  
Signature  Date 4/21/2022

Medical CE Credits: 15.00

Non-Medical CE Credits: 0.00

This course titled WVC 94th Annual Conference (CE Broker Tracking #: 20-898991) has been approved for 45.00 hours of continuing education for veterinarians and 40.00 hours of continuing education for veterinary technicians in jurisdictions that recognize RACE approval. Participants are responsible for ascertaining their state board's continuing education requirements.



Anthony Pease, DVM, MS, DACVR  
Chief Veterinary Medical Officer  
Viticus Group



# RECORD OF SESSIONS

Haroon Mohiuddin

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At the 94th Annual Western Veterinary Conference March 6-9, 2022, I attended the following:

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S06B	Outbreak Proof Your Practice	March 07, 2022	9:00 am	9:50 am	1.00
SA024	Feline Cardiomyopathies, Part 2: Management	March 07, 2022	10:35 am	11:25 am	1.00
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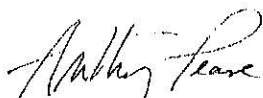
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State of Licensure: CA License #(s): 7124  
Signature Haroon M. Date 4/21/2022

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Non-Medical CE Credits: 0.00

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Anthony Pease, DVM, MS, DACVR  
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# RECORD OF SESSIONS

Haroon Mohiuddin

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Total CE Credits					* 15.00

\* The 94th Annual Conference meets the requirements for xx hours of veterinarian and xx hours of veterinary technician continuing education credit in jurisdictions that recognize AAVSB's 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 of continuing education. WVC, 2425 East Oquendo Road, Las Vegas, Nevada 89120, wvc.org, info@wvc.org

*Continuing Education*  
***Certificate of Achievement***

**This is to certify that**  
**Haroon Mohiuddin**

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State and License #  
Completed the following seminar:

**Antimicrobial Stewardship Made Practical for the Companion Animal Practitioner**  
on 4/8/22

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.vetinfo.com](http://www.vetinfo.com)

# 2022 Pacific Veterinary Conference

## CE CERTIFICATE OF ATTENDANCE

This certifies that Mohiuddin Haroom attended the following sessions at the Pacific Veterinary Conference, in San Francisco, California, June 2- 5, 2022 sponsored by the California Veterinary Medical Association. This form is provided for your records. The form may be used to verify CE requirements for license renewal. Record CE hours for the sessions that you attended and write the final total on the bottom of this form, sign and date.

# of Hrs. Attended	Max. Credits	Thursday, June 2, 2022	# of Hrs. Attended	Max. Credits	Friday, June 3, 2022
	4.0	Small Animal Medicine 1: Immune-Mediated Diseases: A. Macklin	2	2.0	Small Animal Medicine 1: Immune-Mediated Diseases: A. Macklin
3	4.0	Small Animal Medicine 2: Dermatology: W. Rosenkrantz		2.0	Small Animal Medicine 2: Dermatology: W. Rosenkrantz
	3.0	Small Animal Medicine 3: Ophthalmology: M. Church	3	3.5	Small Animal Medicine 1: Ophthalmology: M. Church
3	3.0	Small Animal Medicine 2: Cardiology: H. Kellihan		3.5	Small Animal Medicine 2: Cardiology: H. Kellihan
	4.0	Small Animal Surgery: Orthopedic Disease, Osteoarthritis: N. Kieves	2	2.0	Small Animal Medicine 1: Oncology: S. Ettinger
	3.0	Small Animal Surgery: Dentistry and Maxillofacial Surgery: G. Thatcher		2.0	Small Animal Medicine 2: Nutrition: V. Parker
	4.0	Equine: Muscle Pathology/Genetic Diseases: S. Valberg		2.0	Small Animal Surgery: Orthopedic Disease, Osteoarthritis: N. Kieves
	3.0	Equine: Infectious Diseases and Clinical Neurology: S. DeNotta		3.5	Small Animal Surgery: Dentistry and Maxillofacial Surgery: G. Thatcher
	4.0	Avian/Exotics: Backyard Poultry: L. Tell		2.0	Small Animal Surgery: Orthopedics: B. Beale
	3.0	Avian/Exotics: Reptiles: S. Stahl		3.0	Avian/Exotics: Reptiles: S. Stahl
	4.0	Shelter Medicine: Infectious Diseases: E. Berliner		1.0	Avian/Exotics: Avian and Reptile Hematology: V. Joseph
	2.0	Shelter Medicine: Community-based Approaches to Animal Welfare: C. Karsten		3.0	Avian/Exotics: Clinical Pathology and Laboratory Medicine: C. Cray
	1.0	Shelter Medicine: Grab Bag, Ask Questions about Shelter Protocols: E. Berliner/C. Karsten		2.0	Equine: Infectious Diseases and Clinical Neurology: S. DeNotta
	4.0	Practice Management: Tools to Work on Your Practice, Employee's Life Cycle: A. Crabtree		2.0	Equine: Invasive Surgical Procedures: S. Gutierrez-Nibeyro
	3.0	Practice Management: Hiring, Employee Engagement, Customer Service: L. Boudreau		3.0	Equine: Muscle Pathology/Genetic Diseases: S. Valberg
	7.0	Technician: Nutrition: V. Ograin		4.0	Shelter Medicine: Community-based Approaches to Animal Welfare: C. Karsten
1	1.0	Keynote Speaker: The Role and Medical Management of Military Working Dogs in Combat: J. Giles		2.0	Shelter Medicine: Infectious Diseases: E. Berliner
	1.0	USDA-NVAP - Module 4: E. Nietrzeba		1.0	Shelter Medicine: Ask Questions about Medical Challenges in Shelter: C. Karsten and E. Berliner
	1.0	USDA-NVAP - Module 7: S. Wong		4.0	Practice Management: Hiring, Employee Engagement, Customer Service: L. Boudreau
	1.0	USDA-NVAP - Module 18: D. Nelson		3.0	Practice Management: Tools to Work on Your Practice, Employee's Life Cycle: A. Crabtree
	1.0	USDA-NVAP - Module 13: K. Starzel		7.0	Technician: Small Animal Clinical Practice: L. Rudolph
	1.0	USDA-NVAP - Module 23: E. Marshall		4.0	Integrative Medicine: Oncology: K. Pope
	2.0	USDA-NVAP - Module 9 & 34: L. England		3.0	Disaster Medicine: Emergency and Critical Care: K. Zersen
7		TOTAL CEU Hours for - THURSDAY, JUNE 2		2.0	Hobby Animal: Small Ruminants / FARAD: L. Tell
# of Hrs. Attended	Max. Credits	Sponsored Labs		1.0	NVAP: Introduction to USDA, APHIS and NVAP: D. Nelson
	3.0	Universal Imaging Ultrasound Lecture: J. Sharpley   6/2/22		1.0	NVAP: Reportable Animal Disease Part A & B - D. Nelson
	3.0	Universal Imaging Ultrasound Hands on Lab: J. Sharpley   6/2/22		1.0	NVAP: Animal Movement and Int. Health Certification Process: L. England
	3.0	Karl Storz Endoscopy Lecture: T. McCarthy   The LAP Spay and Other Common Rigid Endoscopy Procedures   6/3/22		1.0	NVAP: Hot Topics: A. Mikolon
	3.0	Karl Storz Endoscopy Hands on Lab: T. McCarthy   Introduction to LAP Spay, Vessel Sealing and Rigid Endoscopy Equipment. (DVM's ONLY) 6/3/22		1.0	NVAP: Orientation to State-Specific Programs & Services: E. Nietrzeba
		TOTAL CEU Hours for Sponsored Labs	7		TOTAL CEU Hours for - FRIDAY, JUNE 3

Record CE hours each day (see reverse side for Saturday & Sunday CE) enter your final CE total, sign and date and keep with your records.

I certify that I have attended the sessions entered above which qualify for a final total of 14 continuing education hours.

Signature Mohiuddin Haroom Date 6/3/22

Thank you for your support in helping make the 2022 Pacific Veterinary Conference a success.

Daniel L. Baker  
CVMA Executive Director

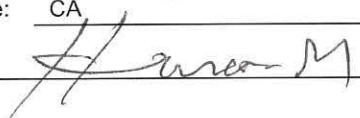


# CERTIFICATE OF ATTENDANCE

**Haroon Mohiuddin, DVM**  
9540 I Ave  
Hesperia, CA 92345-6205  
United States

**Dr. Jon R. Pennell WVC 93rd Annual Conference**  
**September 5-9, 2021**

AAVSB-RACE Provider #20-849813  
44 CE hours of Veterinary Continuing Education  
were presented via lectures and interactive sessions by  
WVC in Mandalay Bay Convention Center, Las Vegas, NV

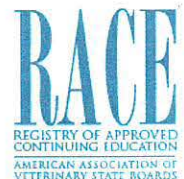
State of Licensure: CA License #(s): 7124 2021  
Signature  Date OCT 7TH

Medical CE Credits: 18.00

Non-Medical CE Credits: 0.00

This course titled Dr. Jon R. Pennell WVC 93rd Annual Conference (CE Broker Tracking #: 20-849813) has been approved for 44.00 hours of continuing education for veterinarians and 41.00 hours of continuing education for veterinary technicians in jurisdictions that recognize RACE approval. Participants are responsible for ascertaining their state board's continuing education requirements.

  
Anthony Pease, DVM, MS, DACVR  
Chief Veterinary Medical Officer  
Viticus Group





# RECORD OF SESSIONS

Haroon Mohiuddin

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Code	Session	Date	Start	End	CE Credits
SA087	How to Prepare for Referral to the ER	September 06, 2021	9:00 am	9:50 am	1.00
SA088	The Acute Abdomen	September 06, 2021	10:00 am	10:50 am	1.00
SA089	Triage & Making Your Hospital ER Ready	September 06, 2021	11:00 am	11:50 am	1.00
SA209	Managing the Difficult Epileptic: Tips & Tricks	September 06, 2021	2:00 pm	2:50 pm	1.00
SA210	Neurologic Episodes: When It's Not a Seizure	September 06, 2021	3:00 pm	3:50 pm	1.00
SA211	The "Back Dog": When to Worry It's Not a Disc	September 06, 2021	4:00 pm	4:50 pm	1.00
SA002	Anesthesia for Patients Too Sick for Anesthesia: They Probably Aren't	September 07, 2021	9:00 am	9:50 am	1.00
SA003	What to Worry About & How to Fix It: Crisis Management in Anesthesia	September 07, 2021	10:35 am	11:25 am	1.00
SA004	Senior Pet Anesthesia & Periop Management: Not Too Old	September 07, 2021	11:35 am	12:25 pm	1.00
S06A	Cyclosporine's Place in the Age of IL-31 Inhibitors	September 07, 2021	2:00 pm	2:50 pm	1.00
S06B	Otitis Externa: Five Common Reasons Treatments Fail	September 07, 2021	3:00 pm	3:50 pm	1.00
SA321P	Lameness Evaluation: Lameness of the Forelimb of the Young Dog	September 08, 2021	10:35 am	11:25 am	1.00
SA323P	Lameness Evaluation: Lameness of the Hindlimb of the Young Dog	September 08, 2021	2:00 pm	2:50 pm	1.00
SA324P	Lameness Evaluation: Lameness of the Hindlimb of the Old Dog	September 08, 2021	3:00 pm	3:50 pm	1.00
SA325P	Orthopedic Traumatology: Know When to Fold 'em, Simple Fractures that the GP Might Choose to Refer to Keep	September 08, 2021	4:35 pm	5:25 pm	1.00

Code	Session	Date	Start	End	CE Credits
SA326P	Orthopedic Traumatology: Know When to Fold 'em, Know When to Walk Away, Know When to Run. Complex Fractures that the GP Might Choose to Refer to a...	September 08, 2021	5:35 pm	6:25 pm	1.00
SA293	What's New in Oxygen Therapy: Breathe it in!	September 09, 2021	10:35 am	11:25 am	1.00
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Signature



Date

4/21/2022

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SA018	Rational Approach to Dogs & Cats with Refractory Diarrhea, Part 2	March 09, 2022	9:00 am	9:50 am	1.00
SA221	Rational Use of Acid Suppressants in Dogs & Cats	March 09, 2022	10:35 am	11:25 am	1.00
SA222	Is There a Place for Antimicrobial Therapy in Dogs & Cats with Acute & Chronic Diarrhea?	March 09, 2022	11:35 am	12:25 pm	1.00

Code	Session	Date	Start	End	CE Credits
Total CE Credits					* 15.00

\* The 94th Annual Conference meets the requirements for xx hours of veterinarian and xx hours of veterinary technician continuing education credit in jurisdictions that recognize AAVSB's 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 of continuing education. WVC, 2425 East Oquendo Road, Las Vegas, Nevada 89120, [wvc.org](http://wvc.org), [info@wvc.org](mailto:info@wvc.org)



**Continuing Education**  
*Certificate of Achievement*

**This is to certify that**  
**Haroon Mohiuddin**

---

State and License #  
Completed the following seminar:

**Antimicrobial Stewardship Made Practical for the Companion Animal Practitioner**  
on 4/8/22

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](http://www.vetvine.com)

# 2022 Pacific Veterinary Conference

## CE CERTIFICATE OF ATTENDANCE

This certifies that Mohiuddin Haroom attended the following sessions at the Pacific Veterinary Conference, in San Francisco California, June 2- 5, 2022 sponsored by the California Veterinary Medical Association. This form is provided for your records. The form may be used to verify CE requirements for license renewal. Record CE hours for the sessions that you attended and write the final total on the bottom of this form, sign and date.

# of Hrs. Attended	Max. Credits	Thursday, June 2, 2022	# of Hrs. Attended	Max. Credits	Friday, June 3, 2022
	4.0	Small Animal Medicine 1: Immune-Mediated Diseases: A. Macklin	2	2.0	Small Animal Medicine 1: Immune-Mediated Diseases: A. Macklin
3	4.0	Small Animal Medicine 2: Dermatology: W. Rosenkrantz		2.0	Small Animal Medicine 2: Dermatology: W. Rosenkrantz
	3.0	Small Animal Medicine 1: Ophthalmology: M. Church	3	3.5	Small Animal Medicine 1: Ophthalmology: M. Church
3	3.0	Small Animal Medicine 2: Cardiology: H. Kellihan		3.5	Small Animal Medicine 2: Cardiology: H. Kellihan
	4.0	Small Animal Surgery: Orthopedic Disease, Osteoarthritis: N. Kieves	2	2.0	Small Animal Medicine 1: Oncology: S. Ettinger
	3.0	Small Animal Surgery: Dentistry and Maxillofacial Surgery: G. Thatcher		2.0	Small Animal Medicine 2: Nutrition: V. Parker
	4.0	Equine: Muscle Pathology/Genetic Diseases: S. Valberg		2.0	Small Animal Surgery: Orthopedic Disease, Osteoarthritis: N. Kieves
	3.0	Equine: Infectious Diseases and Clinical Neurology: S. DeNotta		3.5	Small Animal Surgery: Dentistry and Maxillofacial Surgery: G. Thatcher
	4.0	Avian/Exotics: Backyard Poultry: L. Tell		2.0	Small Animal Surgery: Orthopedics: B. Beale
	3.0	Avian/Exotics: Reptiles: S. Stahl		3.0	Avian/Exotics: Reptiles: S. Stahl
	4.0	Shelter Medicine: Infectious Diseases: E. Berliner		1.0	Avian/Exotics: Avian and Reptile Hematology: V. Joseph
	2.0	Shelter Medicine: Community-based Approaches to Animal Welfare: C. Karsten		3.0	Avian/Exotics: Clinical Pathology and Laboratory Medicine: C. Gray
	1.0	Shelter Medicine: Grab Bag, Ask Questions about Shelter Protocols: E. Berliner/C. Karsten		2.0	Equine: Infectious Diseases and Clinical Neurology: S. DeNotta
	4.0	Practice Management: Tools to Work on Your Practice, Employee's Life Cycle: A. Crabtree		2.0	Equine: Invasive Surgical Procedures: S. Gutierrez-Nibeyro
	3.0	Practice Management: Hiring, Employee Engagement, Customer Service: L. Boudreau		3.0	Equine: Muscle Pathology/Genetic Diseases: S. Valberg
	7.0	Technician: Nutrition: V. Ograin		4.0	Shelter Medicine: Community-based Approaches to Animal Welfare: C. Karsten
1	1.0	Keynote Speaker: The Role and Medical Management of Military Working Dogs in Combat: J. Giles		2.0	Shelter Medicine: Infectious Diseases: E. Berliner
	1.0	USDA-NVAP - Module 4: E. Nietrzeba		1.0	Shelter Medicine: Ask Questions about Medical Challenges in Shelter: C. Karsten and E. Berliner
	1.0	USDA-NVAP - Module 7: S. Wong		4.0	Practice Management: Hiring, Employee Engagement, Customer Service: L. Boudreau
	1.0	USDA-NVAP - Module 18: D. Nelson		3.0	Practice Management: Tools to Work on Your Practice, Employee's Life Cycle: A. Crabtree
	1.0	USDA-NVAP - Module 13: K. Starzel		7.0	Technician: Small Animal Clinical Practice: L. Rudolph
	1.0	USDA-NVAP - Module 23: E. Marshall		4.0	Integrative Medicine: Oncology: K. Pope
	2.0	USDA-NVAP - Module 9 & 84: L. England		3.0	Disaster Medicine: Emergency and Critical Care: K. Zersen
7		TOTAL CEU Hours for - THURSDAY, JUNE 2		2.0	Hobby Animal: Small Ruminants / FARAD: L. Tell
# of Hrs. Attended	Max. Credits	Sponsored Labs		1.0	NVAP: Introduction to USDA, APHIS and NVAP: D. Nelson
	3.0	Universal Imaging Ultrasound Lecture: J. Sharpley   6/2/22		1.0	NVAP: Reportable Animal Disease Part A & B - D. Nelson
	3.0	Universal Imaging Ultrasound Hands on Lab: J. Sharpley   6/2/22		1.0	NVAP: Animal Movement and Int. Health Certification Process: L. England
	3.0	Karl Storz Endoscopy Lecture: T. McCarthy   The LAP Spay and Other Common Rigid Endoscopy Procedures   6/3/22		1.0	NVAP: Hot Topics: A. Mikolaj
	3.0	Karl Storz Endoscopy Hands on Lab: T. McCarthy   Introduction to LAP Spay, Vessel Sealing and Rigid Endoscopy Equipment. (DVM's ONLY) 6/3/22		1.0	NVAP: Orientation to State-Specific Programs & Services: E. Nietrzeba
		TOTAL CEU Hours for Sponsored Labs	7		TOTAL CEU Hours for - FRIDAY, JUNE 3

Record CE hours each day (see reverse side for Saturday & Sunday CE) enter your final CE total, sign and date and keep with your records.

I certify that I have attended the sessions entered above which qualify for a final total of 14 continuing education hours.

Signature

Mohiuddin Haroom 6/23/2022

Date

6/3/22

Thank you for your support in helping make the 2022 Pacific Veterinary Conference a success.

Daniel L. Baxter

Daniel L. Baxter  
CVMA Executive Director





# CERTIFICATE OF ATTENDANCE

**Haroon Mohiuddin, DVM**

9540 I Ave  
Hesperia, CA 92345-6205  
United States

**Dr. Jon R. Pennell WVC 93rd Annual Conference**  
**September 5-9, 2021**

AAVSB-RACE Provider #20-849813  
44 CE hours of Veterinary Continuing Education  
were presented via lectures and interactive sessions by  
WVC in Mandalay Bay Convention Center, Las Vegas, NV

State of Licensure: CA License #(s): 7124 2021  
Signature *Haroon M* Date OCT 7 TH

Medical CE Credits: 18.00

Non-Medical CE Credits: 0.00

This course titled Dr. Jon R. Pennell WVC 93rd Annual Conference (CE Broker Tracking #: 20-849813) has been approved for 44.00 hours of continuing education for veterinarians and 41.00 hours of continuing education for veterinary technicians in jurisdictions that recognize RACE approval. Participants are responsible for ascertaining their state board's continuing education requirements.

Anthony Pease, DVM, MS, DACVR  
Chief Veterinary Medical Officer  
Viticus Group





# RECORD OF SESSIONS

Haroon Mohiuddin

Each lecture is 50 minutes long and provides one hour of CE credit. Labs, Workshops, and Lunch & Learns are recorded by clock hours. Please check with your respective state regarding the acceptance of hours spent inside the Exhibit Hall for continuing education credit. This document is for your personal records and is not reported to RACE by WVC.

Please contact WVC at [info@wvc.org](mailto:info@wvc.org) or call 866-800-7326 if you have any questions regarding sessions not already indicated in your My Record, such as Hands-on Labs, Lunch & Learns, and Workshops.

Code	Session	Date	Start	End	CE Credits
SA087	How to Prepare for Referral to the ER	September 06, 2021	9:00 am	9:50 am	1.00
SA088	The Acute Abdomen	September 06, 2021	10:00 am	10:50 am	1.00
SA089	Triage & Making Your Hospital ER Ready	September 06, 2021	11:00 am	11:50 am	1.00
SA209	Managing the Difficult Epileptic: Tips & Tricks	September 06, 2021	2:00 pm	2:50 pm	1.00
SA210	Neurologic Episodes: When It's Not a Seizure	September 06, 2021	3:00 pm	3:50 pm	1.00
SA211	The "Back Dog": When to Worry It's Not a Disc	September 06, 2021	4:00 pm	4:50 pm	1.00
SA002	Anesthesia for Patients Too Sick for Anesthesia: They Probably Aren't	September 07, 2021	9:00 am	9:50 am	1.00
SA003	What to Worry About & How to Fix It: Crisis Management in Anesthesia	September 07, 2021	10:35 am	11:25 am	1.00
SA004	Senior Pet Anesthesia & Periop Management: Not Too Old	September 07, 2021	11:35 am	12:25 pm	1.00
S06A	Cyclosporine's Place in the Age of IL-31 Inhibitors	September 07, 2021	2:00 pm	2:50 pm	1.00
S06B	Otitis Externa: Five Common Reasons Treatments Fail	September 07, 2021	3:00 pm	3:50 pm	1.00
SA321P	Lameness Evaluation: Lameness of the Forelimb of the Young Dog	September 08, 2021	10:35 am	11:25 am	1.00
SA323P	Lameness Evaluation: Lameness of the Hindlimb of the Young Dog	September 08, 2021	2:00 pm	2:50 pm	1.00
SA324P	Lameness Evaluation: Lameness of the Hindlimb of the Old Dog	September 08, 2021	3:00 pm	3:50 pm	1.00
SA325P	Orthopedic Traumatology: Know When to Fold 'em, Simple Fractures that the GP Might Choose to Refer to Keep	September 08, 2021	4:35 pm	5:25 pm	1.00

Code	Session	Date	Start	End	CE Credits
SA326P	Orthopedic Traumatology: Know When to Fold 'em, Know When to Walk Away, Know When to Run. Complex Fractures that the GP Might Choose to Refer to a...	September 08, 2021	5:35 pm	6:25 pm	1.00
SA293	What's New in Oxygen Therapy: Breathe it in!	September 09, 2021	10:35 am	11:25 am	1.00
SA294	Localizing Respiratory Emergencies: Don't Believe Me, Just Watch (& Listen)	September 09, 2021	11:35 am	12:25 pm	1.00
Total CE Credits					* 18.00

# CERTIFICATE OF ATTENDANCE

**Haroon Mohiuddin, DVM**  
15714 Bear Valley Road  
Victorville, CA 92395  
United States

**94th Annual Conference**  
**March 5-9, 2022**

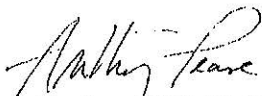
AAVSB-RACE Provider #20-898991  
45 CE hours of Veterinary Continuing Education  
were presented via lectures and interactive sessions by  
WVC in Mandalay Bay Convention Center, Las Vegas, NV

State of Licensure: CA License #(s): 7124  
Signature Haroon M. Date 4/21/2022

Medical CE Credits: 15.00

Non-Medical CE Credits: 0.00

This course titled WVC 94th Annual Conference (CE Broker Tracking #: 20-898991) has been approved for 45.00 hours of continuing education for veterinarians and 40.00 hours of continuing education for veterinary technicians in jurisdictions that recognize RACE approval. Participants are responsible for ascertaining their state board's continuing education requirements.



Anthony Pease, DVM, MS, DACVR  
Chief Veterinary Medical Officer  
Viticus Group



# RECORD OF SESSIONS

Haroon Mohiuddin

Each lecture is 50 minutes long and provides one hour of CE credit. Labs, Workshops, and Lunch & Learns are recorded by clock hours. Please check with your respective state regarding the acceptance of hours spent inside the Exhibit Hall for continuing education credit. This document is for your personal records and is not reported to RACE by WVC.

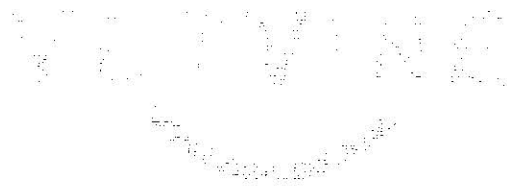
Please contact WVC at [info@wvc.org](mailto:info@wvc.org) or call 866-800-7326 if you have any questions regarding sessions not already indicated in your My Record, such as Hands-on Labs, Lunch & Learns, and Workshops.

At the 94th Annual Western Veterinary Conference March 6-9, 2022, I attended the following:

Code	Session	Date	Start	End	CE Credits
S01C	Staging & Medical Management of Canine Myxomatous Valve Disease	March 06, 2022	4:00 pm	4:50 pm	1.00
S01DP	Searching for Nutrition Solutions for Mitral Valve Disease: A Systems Biology Approach	March 06, 2022	5:00 pm	5:50 pm	1.00
S06A	Why Are We Seeing More Coughing Dogs? And What Do We Need to Do About It?	March 07, 2022	8:00 am	8:50 am	1.00
S06B	Outbreak Proof Your Practice	March 07, 2022	9:00 am	9:50 am	1.00
SA024	Feline Cardiomyopathies, Part 2: Management	March 07, 2022	10:35 am	11:25 am	1.00
SA310	Systemic Therapy in Otitis Externa Cases	March 07, 2022	11:35 am	12:25 pm	1.00
S41A	Laser Therapy's Evolution to Use in Everyday Patient Care	March 07, 2022	2:00 pm	2:50 pm	1.00
S41B	Elevating the Standard of Care through Innovative Technology in Patient Side Clinical Pathology	March 07, 2022	3:00 pm	3:50 pm	1.00
S41C	Incorporating Laser into General Practice: Integration & ROI	March 07, 2022	4:35 pm	5:25 pm	1.00
S16D	Genomics: Changing How We Detect Cancer in Dogs	March 08, 2022	2:00 pm	2:50 pm	1.00
S16B	Advances in the Genomics of Canine Cancer that Are Expanding Options for Therapy	March 08, 2022	3:00 pm	3:50 pm	1.00
SA017	Rational Approach to Dogs & Cats with Refractory Diarrhea, Part 1	March 09, 2022	8:00 am	8:50 am	1.00
SA018	Rational Approach to Dogs & Cats with Refractory Diarrhea, Part 2	March 09, 2022	9:00 am	9:50 am	1.00
SA221	Rational Use of Acid Suppressants in Dogs & Cats	March 09, 2022	10:35 am	11:25 am	1.00
SA222	Is There a Place for Antimicrobial Therapy in Dogs & Cats with Acute & Chronic Diarrhea?	March 09, 2022	11:35 am	12:25 pm	1.00

Code	Session	Date	Start	End	CE Credits
Total CE Credits					* 15.00

\* The 94th Annual Conference meets the requirements for xx hours of veterinarian and xx hours of veterinary technician continuing education credit in jurisdictions that recognize AAVSB's 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 of continuing education. WVC, 2425 East Oquendo Road, Las Vegas, Nevada 89120, wvc.org, info@wvc.org



*Continuing Education*  
***Certificate of Achievement***

**This is to certify that**  
**Haroon Mohiuddin**

---

State and License #  
Completed the following seminar:

**Antimicrobial Stewardship Made Practical for the Companion Animal Practitioner**  
**on 4/8/22**

**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](http://www.vetvine.com)

# 2022 Pacific Veterinary Conference

## CE CERTIFICATE OF ATTENDANCE

This certifies that Mohiuddin Haroom attended the following sessions at the Pacific Veterinary Conference, in San Francisco, California, June 2- 5, 2022 sponsored by the California Veterinary Medical Association. This form is provided for your records. The form may be used to verify CE requirements for license renewal. Record CE hours for the sessions that you attended and write the final total on the bottom of this form, sign and date.

# of Hrs. Attended	Max. Credits	Thursday, June 2, 2022	# of Hrs. Attended	Max. Credits	Friday, June 3, 2022
	4.0	Small Animal Medicine 1: Immune-Mediated Diseases: A. Macklin	2	2.0	Small Animal Medicine 1: Immune-Mediated Diseases: A. Macklin
3	4.0	Small Animal Medicine 2: Dermatology: W. Rosenkrantz		2.0	Small Animal Medicine 2: Dermatology: W. Rosenkrantz
	3.0	Small Animal Medicine 1: Ophthalmology: M. Church	3	3.5	Small Animal Medicine 1: Ophthalmology: M. Church
3	3.0	Small Animal Medicine 2: Cardiology: H. Kellihan		3.5	Small Animal Medicine 2: Cardiology: H. Kellihan
	4.0	Small Animal Surgery: Orthopedic Disease, Osteoarthritis: N. Kieves	2	2.0	Small Animal Medicine 1: Oncology: S. Ettinger
	3.0	Small Animal Surgery: Dentistry and Maxillofacial Surgery: G. Thatcher		2.0	Small Animal Medicine 2: Nutrition: V. Parker
	4.0	Equine: Muscle Pathology/Genetic Diseases: S. Valberg		2.0	Small Animal Surgery: Orthopedic Disease, Osteoarthritis: N. Kieves
	3.0	Equine: Infectious Diseases and Clinical Neurology: S. DeNotta		3.5	Small Animal Surgery: Dentistry and Maxillofacial Surgery: G. Thatcher
	4.0	Avian/Exotics: Backyard Poultry: L. Tell		2.0	Small Animal Surgery: Orthopedics: B. Beale
	3.0	Avian/Exotics: Reptiles: S. Stahl		3.0	Avian/Exotics: Reptiles: S. Stahl
	4.0	Shelter Medicine: Infectious Diseases: E. Berliner		1.0	Avian/Exotics: Avian and Reptile Hematology: V. Joseph
	2.0	Shelter Medicine: Community-based Approaches to Animal Welfare: C. Karsten		3.0	Avian/Exotics: Clinical Pathology and Laboratory Medicine: C. Cray
	1.0	Shelter Medicine: Grab Bag, Ask Questions about Shelter Protocols: E. Berliner/C. Karsten		2.0	Equine: Infectious Diseases and Clinical Neurology: S. DeNotta
	4.0	Practice Management: Tools to Work on Your Practice, Employee's Life Cycle: A. Crabtree		2.0	Equine: Invasive Surgical Procedures: S. Gutierrez-Nibeyro
	3.0	Practice Management: Hiring, Employee Engagement, Customer Service: L. Boudreau		3.0	Equine: Muscle Pathology/Genetic Diseases: S. Valberg
	7.0	Technician: Nutrition: V. Ograin		4.0	Shelter Medicine: Community-based Approaches to Animal Welfare: C. Karsten
1	1.0	Keynote Speaker: The Role and Medical Management of Military Working Dogs in Combat: J. Giles		2.0	Shelter Medicine: Infectious Diseases: E. Berliner
	1.0	USDA-NVAP - Module 4: E. Nietrzeba		1.0	Shelter Medicine: Ask Questions about Medical Challenges in Shelter: C. Karsten and E. Berliner
	1.0	USDA-NVAP - Module 7: S. Wong		4.0	Practice Management: Hiring, Employee Engagement, Customer Service: L. Boudreau
	1.0	USDA-NVAP - Module 18: D. Nelson		3.0	Practice Management: Tools to Work on Your Practice, Employee's Life Cycle: A. Crabtree
	1.0	USDA-NVAP - Module 13: K. Starzel		7.0	Technician: Small Animal Clinical Practice: L. Rudolph
	1.0	USDA-NVAP - Module 23: E. Marshall		4.0	Integrative Medicine: Oncology: K. Pope
	2.0	USDA-NVAP - Module 9 & 34: L. England		3.0	Disaster Medicine: Emergency and Critical Care: K. Zersen
7		TOTAL CEU Hours for - THURSDAY, JUNE 2		2.0	Hobby Animal: Small Ruminants / FARAD: L. Tell
# of Hrs. Attended	Max. Credits	Sponsored Labs		1.0	NVAP: Introduction to USDA, APHIS and NVAP: D. Nelson
	3.0	Universal Imaging Ultrasound Lecture: J. Sharpley   6/2/22		1.0	NVAP: Reportable Animal Disease Part A & B - D. Nelson
	3.0	Universal Imaging Ultrasound Hands on Lab: J. Sharpley   6/2/22		1.0	NVAP: Animal Movement and Int. Health Certification Process: L. England
	3.0	Karl Storz Endoscopy Lecture: T. McCarthy   The LAP Spay and Other Common Rigid Endoscopy Procedures   6/3/22		1.0	NVAP: Hot Topics: A. Mikolon
	3.0	Karl Storz Endoscopy Hands on Lab: T. McCarthy   Introduction to LAP Spay, Vessel Sealing and Rigid Endoscopy Equipment. (DVM's ONLY) 6/3/22		1.0	NVAP: Orientation to State-Specific Programs & Services: E. Nietrzeba
		TOTAL CEU Hours for Sponsored Labs	7		TOTAL CEU Hours for - FRIDAY, JUNE 3

Record CE hours each day (see reverse side for Saturday & Sunday CE) enter your final CE total, sign and date and keep with your records.

I certify that I have attended the sessions entered above which qualify for a final total of 14 continuing education hours.

Signature

Mohiuddin Haroom  
6/23/2022

Date

6/3/22

Thank you for your support in helping make the 2022 Pacific Veterinary Conference a success.

Daniel L. Barker  
Daniel L. Barker  
CVMA Executive Director



## EXHIBIT 8

**Bommi V Reddy DVM MD ND**  
**Ca Vet License # 008104**  
**Reddy For Wellness**  
**4830 Faber Rd, Shingle Springs, CA 95682**  
**760-559-9278**  
**reddyvet@gmail.com**

October 19, 2022

Director  
California Veterinary Medical Board  
1747 N Market Blvd # 230  
Sacramento, CA 95834

Dear Sir,

I am writing this letter with reference to Dr. Haroon Mohiuddin DVM, whose veterinary license was suspended a couple of years ago. Dr. Haroon worked for my Vet practice approximately 5 years in Barstow, California, after which he joined as a vet in the Isa Companion Hospital in the same city.

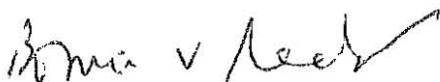
Before I sold my practice around 3 years ago, Haroon used to visit me to discuss the unfortunate events that led up to his license being revoked by the Board. He did discuss the events that were beyond his capacity to monitor at the practice, the things went unbeknownst to him and the misleading situations he had to face because of some decisions that were not well thought of and planned.

While recalling the circumstances, he admitted that he has learned a lesson to be extra vigilant and will involve the hospital administrator or managers in day-to-day management of cases in record keeping, treatment of pets and compliance with the Board Rules and Regulations, etc.

I trust once his license is validated; he will practice in an optimal manner within the compliance of the Board.

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

Sincerely



Bommi v Reddy DVM MD ND

*ARK ANIMAL HOSPITAL  
15714 BEAR VALLEY ROAD  
VICTORVILLE, CA 92395  
TELEPHONE [REDACTED]*

---

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

**RE: Mr. Haroon Mohiuddin  
License #7124**

To Whom It May Concern,

I, DALE MISKO, DVM, have been a colleague of Mr. Haroon's for years prior to disciplinary penalty against his license to present time. Mr. Haroon has completed CE courses since having his license suspended and is a true asset in the Veterinarian world. He is a caring and attentive Doctor and deserves to be reinstated as a Veterinarian.

You can reach me at [REDACTED]

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

Print: DALE MISKO, DVM

Signature

*Dale Misko*

Date

*10/24/22*

*ARK ANIMAL HOSPITAL  
15714 BEAR VALLEY ROAD  
VICTORVILLE, CA 92395  
TELEPHONE [REDACTED]*

---

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

**RE: Mr. Haroon Mohiuddin  
License #7124**

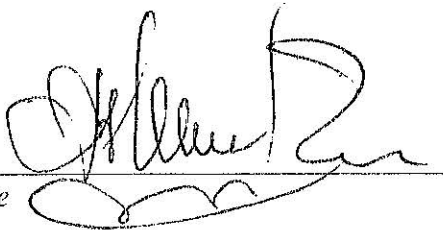
To Whom It May Concern,

ARK Animal Hospital has employed Dr. Haroon at our Clinic for the past several years prior to the suspension of his license. We found him to be gentle, caring and thorough with the animals. Since the disciplinary action against his license, he has completed hours of CE courses. We have the utmost confidence that Dr. Haroon will get his license reinstated and we plan on employing him just as soon as his license is active again. Please feel free to contact me at any time should you have any questions at [REDACTED]  
[REDACTED]

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

*Print: PAVEL SHIMKO, C.E.O.*

*Signature*



*Date*

*Oct. 17, 2022*

*ARK ANIMAL HOSPITAL  
15714 BEAR VALLEY ROAD  
VICTORVILLE, CA 92395  
TELEPHONE [REDACTED]*

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

**RE: Mr. Haroon Mohiuddin  
License #7124**

To Whom It May Concern,

I, DALE MISKO, DVM, have been a colleague of Mr. Haroon's for years prior to disciplinary penalty against his license to present time. Mr. Haroon has completed CE courses since having his license suspended and is a true asset in the Veterinarian world. He is a caring and attentive Doctor and deserves to be reinstated as a Veterinarian.

You can reach me at [REDACTED]

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

*Print: DALE MISKO, DVM*

*Signature*

*DALE MISKO*

*Date*

*10/24/22*

## EXHIBIT 9



## PETITION FOR REINSTATEMENT

### CONVICTION STATUS REPORT

**PETITIONER:** Haroon Mohiuddin

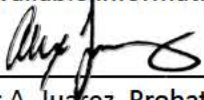
**TYPE OF PETITION:** Petition for Reinstatement

**CASE NUMBER:** 4602023001725

**CRIMINAL CONVICTION STATUS:**

Petitioner provided an incomplete Request for Live Scan Service form with his petition on May 8, 2023. The Board does not have current fingerprint results for the Petitioner. Board staff notified Petitioner's Counsel, William Francis, of this deficiency, but Petitioner has been unresponsive.

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

Submitted by:  Date March 29, 2024  
Alexander A. Juarez, Probation Monitor

## EXHIBIT 10





## REQUEST FOR LIVE SCAN SERVICE

### Applicant Submission

A0133

ORI (Code assigned by DOJ)

VETERINARIAN

Type of License/Certification/Permit OR Working Title (Maximum 30 characters - if assigned by DOJ, use exact title assigned)

### Contributing Agency Information:

VETERINARY MEDICAL BOARD

Agency Authorized to Receive Criminal Record Information

1747 N. MARKET BLVD., STE. 230

Street Address or P.O. Box

SACRAMENTO

City

CA  
State

95834  
ZIP Code

### LICENSE/REGISTRATION

Authorized Applicant Type

06386

Mail Code (five-digit code assigned by DOJ)

JEFFREY WEILER

Contact Name (mandatory for all school submissions)

Contact Telephone Number

### Applicant Information:

MOHIUDDIN

Last Name

HAROON

First Name

M

Middle Initial

Suffix

Other Name: (AKA or Alias)

Last Name

Sex ☒ Male ☐ Female

Date of Birth

5' 11"

140

Height

Weight

BROWN

Eye Color

BLK/GREY

Hair Color

INDIA

Place of Birth (State or Country)

Social Security Number

First Name

Suffix

Driver's License Number

Billing  
Number

(Agency Billing Number)

Misc.  
Number

(Other Identification Number)

BARSTOW

City

CA  
State

92311  
ZIP Code

Home Address 701 MONTANA, SPACE 99  
Street Address or P.O. Box

I have received and read the included Privacy Notice, Privacy Act Statement, and Applicant's Privacy Rights.

/s/ Haroon Mohiuddin

Applicant Signature

Date

Your Number: VET7124

OCA Number (Agency Identifying Number)

Level of Service: ☒ DOJ ☒ FBI

(If the Level of Service indicates FBI, the fingerprints will be used to check the criminal history record information of the FBI.)

If re-submission, list original ATI number:  
(Must provide proof of rejection)

Original ATI Number

Employer (Additional response for agencies specified by statute):

Employer Name

Street Address or P.O. Box

Telephone Number (optional)

City

State

ZIP Code

Mail Code (five digit code assigned by DOJ)

Name of Operator

Date

Transmitting Agency

LSID

ATI Number

EXHIBIT 10-001  
Amount Collected/Billed

## EXHIBIT 11

Letter # 2

**LAW OFFICE OF  
WILLIAM A. FRANCIS  
ATTORNEY AT LAW  
1484 NORTH ALTADENA DRIVE  
PASADENA, CALIFORNIA 91107-1403  
TELEPHONE (626) 817-9801  
TELECOPIER (626) 817-9804  
WF@WAFLAWOFFICE.COM**

May 1, 2023

Veterinary Medical Board  
1747 N. Market Blvd., Suite 230  
Sacramento, CA 95834-2978

Attention: Mr. Alexander Juarez

**RE: Haroon Mohiuddin, Vet License 7124**

Dear Mr. Juarez:

We talked about whether the Records of the Board show when Dr. Mohiuddin received the Notice Suspending his license for three years.


The other thing we talked about was how the Board when we tried to file the Bre Eze, CA website to submit an Application for License came up that the sum of \$1,588 needed to be paid and his debit card was used to pay it.

On the first subject, could you please send me a copy of the proof of when that Notice was sent out.

On the second subject, I provided you what I received from the Board confirming the receipt of the \$1,588 that the Board received. It stated it was on the "sale" of something and not a payment of a long overdue Board charge that was assessed maybe 30 years ago and never paid. Could we have a better accounting of this than that?

Thanks for your expected help.

Very Truly Yours,



William A. Francis

WAF/pj

cc: Haroon Mohiuddin w/enclosure

## William Francis

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**From:** VETERINARY <noreply@elavon.com>  
**Sent:** Thursday, June 23, 2022 12:07 PM  
**To:** William Francis  
**Subject:** Order Confirmation

**VETERINARY**  
**1625 N MARKET BLVD**  
**STE S103**  
**SACRAMENTO, CA 95834**  
**916-515-5220**

### Order Results

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**Profile Name:** VETERINARY  
**Transaction ID:** 230622ED2-889C2EC8-09F5-4EBB-A01D-DBFEC7F8C489  
**Date/Time:** 06/23/2022 12:10:13 PM  
**Transaction Type:** SALE  
**Approval Message:** APPROVAL  
**Approval Code:** 151707  
**ECI:**

### Order Section

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**Card Number :** [REDACTED]  
**Amount :** \$1588.00 USD

### Billing Address

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**First Name :** haroon  
**Last Name :** mohiuddin  
**Address 1 :** [REDACTED]  
**Address 2 :** [REDACTED]  
**City :** [REDACTED]  
**State/Province :** [REDACTED]  
**Postal Code :** [REDACTED]  
**Country :** United States  
**Phone :** [REDACTED]  
**Email Address :** [REDACTED]

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