

ARKANSAS LIVESTOCK AND POULTRY COMMISSION

Minutes

January 8, 2025

1:00 p.m.

The Livestock and Poultry Commission met on January 8, 2025, at the Arkansas Department of Agriculture, 1 Natural Resources Drive, Little Rock, AR.

Members present: Marcus Creasy, Bruce Maloch, Dr. Mike Pallone

Members present via Zoom: Chad Chester, Tyler Davis, Dr. William Hewat, Tommy Wren, Dan Wright

Member(s) absent: Dr. Sara Throne

Patrick Fisk, Director, Livestock and Poultry Division, and other staff members were in attendance.

**Formal disciplinary hearings**

Joshua Baxter, Hearing Officer, present today in the matter of Dr. Robert Zapecki, Docket No. 2019-20 and 2020-04, to be heard before the Arkansas Department of Agriculture.

The hearing proceeded. Transcript was taken by a transcriptionist.

All handouts are shown as **Attachment 1** and **Attachment 2**.

Upon conclusion of the hearing, the Livestock and Poultry Commission members deliberated regarding the findings of fact and conclusions of law and/or any penalties to be handed down.

**Following deliberation, moved by Dr. Pallone, seconded by Wren regarding the findings of fact that Dr. Zapecki was found to be in violation of these specific provisions, and then the penalty laid down was revocation of his license.**

**Motion carried unanimously.**

Baxter stated to let the record reflect that the decision was unanimous. Please reduce the decision of writing and make your attempt service upon all parties. If the respondent wishes to appeal a decision, an appeal can be taken under any specific provisions regarding this Board or

under the Arkansas Administrative Procedures Act located under Arkansas Code Annotated 25-15-201 and following. Baxter asked for any further questions or comments. Seeing none this hearing is concluded and the record is closed.

  
\_\_\_\_\_  
Tommy Wren, Chair



**Arkansas Livestock & Poultry Commission  
Special Meeting  
January 8, 2025  
In re Docket No. 2019-20 & 2020-04**

**Arkansas Livestock & Poultry Commission**

**Dockets No. 2019-20 & 2020-04**

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**Arkansas Department of Agriculture**

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**BEFORE THE ARKANSAS LIVESTOCK AND POULTRY COMMISSION**

**IN THE MATTER OF  
ROBERT G. ZEPECKI, DVM**

**Docket Nos. 2019-20  
& 2020-04**

**AMENDED NOTICE OF HEARING**

The Arkansas Livestock and Poultry Commission (Commission) will conduct a hearing to determine whether Robert G. Zepecki, DVM (Respondent) has violated Ark. Code Ann. § 17-101-305, *et. seq* and the Rules of the Arkansas Veterinary Medical Examining Board.

Legal authority and jurisdiction for the Commission is found in Ark. Code Ann. § 2-33-107, Ark. Code Ann. § 17-101-203, and the "Arkansas Administrative Procedure Act," Ark. Code Ann. § 25-15-201 *et seq*.

**ALLEGATIONS OF FACT**

1. On May 23, 2022, the Veterinary Medical Examining Board (Board) conducted hearings on Docket Nos. 2019-20 & 2020-04;
2. The Board found that Respondent failed to adequately maintain medical records per Ark. Code Ann. § 17-101-305 (a)(11) and Rule 9.E. (6) in Docket No. 2019-20;
3. The Board also found Respondent failed to adequately maintain medical records per Ark. Code Ann. § 17-101-305 (a)(11) and Rule 9.E; that Respondent acted with incompetence, gross negligence, or other malpractice in the practice of veterinary medicine per Ark. Code Ann. § 17-101-305 (a)(5), and that Respondent undertook the care of an animal and thereafter failed to render the care as generally accepted by the veterinary profession in violation of Ark. Code Ann. § 17-101-305 (a)(11) and Rule 19.F. in Docket No. 2020-04;
4. The Board issued an Order on May 23, 2022 requiring Respondent to complete ten (10) hours of continuing education in record keeping within six (6) months of the date of the Order, submit six (6) records of medical cases per month for twenty-four (24) months beginning in June 2022, and pay two (2) civil penalties of \$5,000 respectively;
5. Respondent filed for Judicial Review on June 7, 2022, and the Arkansas Department of Agriculture (Department) filed a response on July 7, 2022;
6. The Arkansas Court of Appeals dismissed the case without prejudice on August 7, 2023;
7. Respondent has not complied with the Order of the Board.

## APPLICABLE LAW

1. Ark. Code Ann. § 17-101-203 (1)-(11):

o The Arkansas Livestock and Poultry Commission shall have the power to:

(1) Examine and determine the qualifications and fitness of applicants for a license to practice general veterinary medicine or any specialty area thereof, and the certification of veterinary technicians in Arkansas, and issue, renew, deny, suspend, or revoke licenses or certificates, or otherwise discipline veterinarians or veterinary technicians;

(2) Subpoena witnesses and take testimony bearing on the records of applicants for permits or for licenses to practice veterinary medicine in the State of Arkansas;

(3) Establish annually a schedule of license and permit fees based on the commission's financial requirements for the ensuing year;

(4) Conduct investigations into matters brought before the commission and proceed on the commission's own motion to a hearing or other disciplinary action;

(5) [Repealed.]

(6) Purchase or rent necessary office space, equipment, and supplies;

(7) Promulgate and enforce rules necessary to establish recognized standards for the practice of veterinary medicine and to carry out the provisions of this chapter. The commission shall make available to interested members of the public copies of this chapter and all rules promulgated by the commission;

(8) Examine and evaluate qualifications of education, skill, and experience for certification of a person as a veterinary technician and for annual registration of employment;

(9) Regulate all veterinarians in a corporate practice and prevent corporate or noncorporate holdings from being sold to, directed by, or controlled by a nonveterinarian;

(10)(A) Hold hearings on all matters properly brought before the commission and, in connection thereto, administer oaths, receive evidence, make the necessary determinations, and enter orders consistent with the findings.

(B) The commission may require by subpoena the attendance and testimony of witnesses and the production of papers, records, or other documentary evidence and commission depositions;

(11) Bring proceedings in the courts for the enforcement of this chapter or any rules made under this chapter; and...

2. Ark. Code Ann. § 17-101-305:

- Upon written complaint by any person or on the Arkansas Livestock and Poultry Commission's own motion and after notice and hearing as prescribed in the Arkansas Administrative Procedure Act, § 25-15-201 et seq., the commission may deny, suspend for a definite period, revoke the license of any veterinarian, or impose a civil penalty for:

(18) Failure to comply with any subpoena or subpoena duces tecum from the commission, or an order of the commission.

**CHARGES**

Based upon evidence obtained by the Arkansas Department of Agriculture, Respondent is charged with violating Ark. Code Ann. § 17-101-305 (a)(18) by:

- (1) Noncompliance with the penalties of the Order.

**TIME AND PLACE OF HEARING**

The hearing will commence at 1:00 p.m. on January 8, 2025, in the Arkansas Department of Agriculture's Main Conference Room.

For any questions contact the Arkansas Department of Agriculture by phone at (501) 225-1598, email at [info@agriculture.arkansas.gov](mailto:info@agriculture.arkansas.gov), or in writing to 1 Natural Resources Drive, Little Rock, AR 72205.

You may be heard in person, may be represented by counsel, may cross-examine witnesses, and may offer witnesses and documentary evidence in defense of the allegations and charges contained herein.

\_\_\_\_\_  
Patrick Fisk  
Director  
Arkansas Livestock and Poultry Commission

CERTIFICATE OF SERVICE

I, Tanner Thomas, attorney for the Arkansas Department of Agriculture, do hereby certify that I have served a copy of the foregoing order by mailing a copy of same, by email and by certified mail, with return receipt requested and postage prepaid, on this \_\_\_ day of December, 2024 to:

Lloyd W. "Tre" Kitchens, Esq.  
The Brad Hendricks Law Firm  
500 C Pleasant Valley Drive  
Little Rock, AR 72227  
[tkitchens@bradhendricks.com](mailto:tkitchens@bradhendricks.com)

---

Tanner Thomas  
Managing Attorney  
Arkansas Department of Agriculture

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Mr. Lloyd "Tre" Kitchens  
The Brad Hendricks Law Firm  
500 C Pleasant Valley Drive  
Little Rock, AR 72227



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2. Article Number (Transfer from service label)

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PS Form 3811, July 2020 PSN 7530-02-000-9053

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**From:** [Tanner Thomas](#)  
**To:** [Audra Murray](#); [Kara Maack \(AGRI\)](#); [Tre Kitchens](#)  
**Subject:** RE: Amended Notice of Hearing | Docket Nos. 2022-05 & 2019-20/2020-04  
**Date:** Monday, December 30, 2024 8:24:00 AM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[2019-20 2020-04 NOH - Amend to Jan 8 2025.pdf](#)  
[2022-05 Jan 8 Amended NOH.pdf](#)  
**Importance:** High

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Tre,

Please see the attached PDF copies of updated hearing notices for Dr. Zepecki. Signed copies were sent via certified mail on Monday, December 23, 2024 to your office to inform your client. **The hearings will be next week, January 8, 2025 at 9:30 a.m. and 1:00 p.m.**

If you or your client have conflicting court dates, please notify me *immediately*.

Sincerely,

**TANNER THOMAS**  
MANAGING ATTORNEY

Arkansas Department of Agriculture  
1 Natural Resources Drive, Little Rock, AR 72205  
Desk: (501) 823-1736 | Cell: (501) 353-3542  
[tanner.thomas@agriculture.arkansas.gov](mailto:tanner.thomas@agriculture.arkansas.gov)



**From:** Audra Murray <amurray@bradhendricks.com>  
**Sent:** Monday, December 9, 2024 1:19 PM  
**To:** Tanner Thomas <Tanner.Thomas@agriculture.arkansas.gov>; Kara Maack (AGRI) <kara.m.maack@agriculture.arkansas.gov>; Tre Kitchens <tkitchens@bradhendricks.com>  
**Subject:** RE: Amended Notice of Hearing | Docket Nos. 2022-05 & 2019-20/2020-04

Tanner- attached is a Motion for Continuance for each of the hearings set for Thursday. Dr. Zepecki has been subpoenaed to Court in Garland County Thursday morning.

Audra Murray

**THE BRAD HENDRICKS LAW FIRM**  
500 C Pleasant Valley Drive, Little Rock, Arkansas 72227  
[501-221-0444](tel:501-221-0444) | Fax: [501-661-0196](tel:501-661-0196)

**BEFORE THE ARKANSAS LIVESTOCK AND POULTRY COMMISSION**

**IN THE MATTER OF  
ROBERT G. ZEPECKI, DVM**

**Docket Nos. 2019-20  
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Legal authority and jurisdiction for the Commission is found in Ark. Code Ann. § 2-33-107, Ark. Code Ann. § 17-101-203, and the "Arkansas Administrative Procedure Act," Ark. Code Ann. § 25-15-201 *et seq*.

**ALLEGATIONS OF FACT**

1. On May 23, 2022, the Veterinary Medical Examining Board (Board) issued an Order requiring Respondent to complete ten (10) hours of continuing education in record keeping within six (6) months of the date of the Order, submit six (6) records of medical cases per month for twenty-four (24) months beginning in June 2022, and pay two (2) civil penalties of \$5,000 respectively;
2. Respondent filed for Judicial Review on June 7, 2022, and the Arkansas Department of Agriculture (Department) filed a response on July 7, 2022;
3. The Arkansas Court of Appeals dismissed the case without prejudice on August 7, 2023;
4. Respondent has not complied with the Order of the Board.

**APPLICABLE LAW**

1. Ark. Code Ann. § 17-101-203 (1)-(11):
  - o The Arkansas Livestock and Poultry Commission shall have the power to:
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(3) Establish annually a schedule of license and permit fees based on the commission's financial requirements for the ensuing year;

(4) Conduct investigations into matters brought before the commission and proceed on the commission's own motion to a hearing or other disciplinary action;

(5) [Repealed.]

(6) Purchase or rent necessary office space, equipment, and supplies;

(7) Promulgate and enforce rules necessary to establish recognized standards for the practice of veterinary medicine and to carry out the provisions of this chapter. The commission shall make available to interested members of the public copies of this chapter and all rules promulgated by the commission;

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(9) Regulate all veterinarians in a corporate practice and prevent corporate or noncorporate holdings from being sold to, directed by, or controlled by a nonveterinarian;

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**CHARGES**

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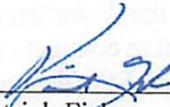
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**TIME AND PLACE OF HEARING**

The hearing will commence at 1:00 p.m. on December 12, 2024, in the Arkansas Department of Agriculture's Main Conference Room.

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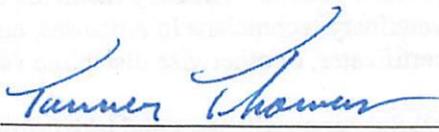
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\_\_\_\_\_  
Patrick Fisk  
Director  
Arkansas Livestock and Poultry Commission

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I, Tanner Thomas, attorney for the Arkansas Department of Agriculture, do hereby certify that I have served a copy of the foregoing order by mailing a copy of same, by email and by certified mail, with return receipt requested and postage prepaid, on this 29 day of October, 2024 to:

Lloyd W. "Tre" Kitchens, Esq.  
The Brad Hendricks Law Firm  
500 C Pleasant Valley Drive  
Little Rock, AR 72227  
[tkitchens@bradhendricks.com](mailto:tkitchens@bradhendricks.com)

  
\_\_\_\_\_  
Tanner Thomas  
Managing Attorney  
Arkansas Department of Agriculture

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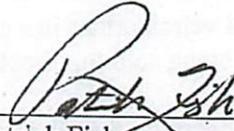
- (1) Non-compliance with the Order.

**TIME AND PLACE OF HEARING**

The hearing will commence at 8:00 a.m. on November 5, 2024, in the Arkansas Department of Agriculture's Main Conference Room.

For any questions contact the Arkansas Department of Agriculture by phone at (501) 225-1598, email at [info@agriculture.arkansas.gov](mailto:info@agriculture.arkansas.gov), or in writing to 1 Natural Resources Drive, Little Rock, AR 72205.

You may be heard in person, may be represented by counsel, may cross-examine witnesses, and may offer witnesses and documentary evidence in defense of the allegations and charges contained herein.

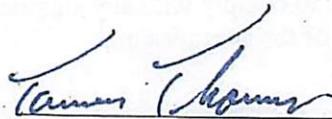


Patrick Eisk  
Director  
Arkansas Livestock and Poultry Commission

**CERTIFICATE OF SERVICE**

I, Tanner Thomas, attorney for the Arkansas Department of Agriculture, do hereby certify that I have served a copy of the foregoing order by mailing a copy of same, by email and by certified mail, with return receipt requested and postage prepaid, on this 9<sup>th</sup> day of August, 2024 to:

Lloyd W. "Tre" Kitchens, Esq.  
The Brad Hendricks Law Firm  
500 C Pleasant Valley Drive  
Little Rock, AR 72227  
[tkitchens@bradhendricks.com](mailto:tkitchens@bradhendricks.com)



Tanner Thomas  
Managing Attorney  
Arkansas Department of Agriculture

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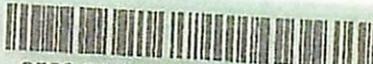
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 Little Rock, AR 72227



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- Agent
- Addressee

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8/12/24

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- Signature Confirmation™
- Signature Confirmation Restricted Delivery

PS Form 3811, July 2020 PSN 7530-02-000-9053

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**RULES OF THE ARKANSAS VETERINARY MEDICAL EXAMINING BOARD**  
**(Adopted: 12/1/1976) (Amended: 6/20/2019) (Effective: 7/18/2020)**

1. For the rules contained herein, the term "Board" means the Veterinary Medical Examining Board.
2. The principal office of the Board is located at 1 Natural Resources Drive, Little Rock, Arkansas 72205.
3. Pursuant to Act 60 of 1987, the Board creates a specialty area in poultry practice. Veterinarians seeking licensure under this provision will be tested only in poultry medicine. A veterinarian who is only issued a Poultry Specialty license will not be allowed to practice any other form of veterinary medicine.
4. Each person holding a license or certificate from the Board must file his or her current mailing address with the Board at its principal office and must immediately notify the Board at its principal office of a change in their mailing address, giving both his or her old and new address.

**FEES**

**(Adopted: 8/8/1981) (Amended: 5/25/2021) (Effective: 12/3/2021)**

**Veterinarians:**

5. The schedule for license, certificate, and permit fees will be as follows:
  - A. The application fee for licensure by examination is one hundred dollars (\$100.00) and must be paid at the time of filing the application. The completed application must be received at least thirty (30) days prior to the date of the next written state board examination.
  - B. The application fee for licensure by endorsement is one hundred dollars (\$100.00) and must be paid at the time of filing the application.
  - C. The application fee is waived for a veterinarian applying for a license pursuant to Ark. Code Ann. §17-4-105.
  - D. North American Veterinary Licensing Examination (NAVLE) candidates must submit to the Board an application for licensure by examination, as well as submit a NAVLE application and fee directly to the International Council for Veterinary Assessment.
  - E. The annual renewal fee for an active veterinary license is one hundred dollars (\$100.00) and the annual renewal fee for an inactive veterinary license is twenty-five dollars (\$25.00). A veterinarian CANNOT practice in Arkansas with an inactive license.
  - F. The application fee for a corporate practice is thirty-five dollars (\$35.00). The annual renewal fee for a corporate practice certificate is ten dollars (\$10.00).

G. All renewals are due by March 31<sup>st</sup> each year. The delinquent fee is one hundred dollars (\$100.00) and will be due on all veterinarian and corporate practice renewals received after the postmarked date of March 31<sup>st</sup> each year. The renewal fee is waived for a veterinarian who is on active duty with any branch of the armed services of the United States for not to exceed three (3) years or for the duration of a national emergency, whichever is longer.

H. The fee for a temporary permit is fifty dollars (\$50.00).

I. The fee for a restricted license is fifty dollars (\$50.00).

J. The fee to re-issue an original license is ten dollars (\$10.00) and the request must be made in writing.

K. All fees are non-refundable.

**Veterinary Technicians and Veterinary Technologists:**

6. The schedule for certificate fees will be as follows:

A. The application fee is forty dollars (\$40.00) and must be paid at the time of filing the application. The application fee is waived for a person applying for a certification pursuant to Ark. Code Ann. §17-4-105.

B. Veterinary Technician National Examination (VTNE) candidates must submit to the Board an application for certification, as well as submit a VTNE application and fee directly to the American Association of Veterinary State Boards.

C. The annual renewal fee for certification is twenty-five dollars (\$25.00).

D. All renewals are due by March 31<sup>st</sup> each year. The delinquent fee is fifty dollars (\$50.00) and will be due on all renewals received after the postmarked date of March 31<sup>st</sup> each year. The renewal fee is waived for a veterinary technician or veterinary technologist who is on active duty with any branch of the armed services of the United States for not to exceed three (3) years or for the duration of a national emergency, whichever is longer.

E. The fee to re-issue an original certificate is ten dollars (\$10.00) and the request must be made in writing.

F. All fees are non-refundable.

**CONTINUING EDUCATION**

**(Adopted: 12/1/1976) (Amended: 4/30/2020) (Effective: 7/18/2020)**

7. The continuing education requirements for the renewal of an active license or certificate are as follows:

**A. Veterinarians must earn twenty (20) continuing education hours each year to be eligible for license renewal.**

**(1) Continuing education topic requirements are as follows:**

**(a) Ten (10) hours must be education pertaining to veterinary medicine and surgery;**

**(b) A maximum of eight (8) hours can be education pertaining to non-scientific topics;**

**(c) A maximum of two (2) hours can be education through visitation with a colleague, not associated with the veterinarian's practice, at the facility of the colleague; and**

**(d) A maximum of two (2) hours can be education through attending exhibit halls at state or national meetings and conferences.**

**(2) Continuing education hours can be earned as follows:**

**(a) At least ten (10) hours must be taken in-person or through live, interactive webinars; and**

**(b) A maximum of ten (10) hours will be allowed for online education that is pre-recorded or non-interactive.**

**B. Veterinary technicians and veterinary technologists must earn twelve (12) continuing education hours each year to be eligible for certificate renewal.**

**(1) Continuing education topic requirements are as follows:**

**(a) Eight (8) hours must be education pertaining to veterinary medicine and surgery; and**

**(b) A maximum of four (4) hours can be education pertaining to non-scientific topics.**

**(2) Continuing education hours can be earned as follows:**

**(a) At least six (6) hours must be taken in-person or through live, interactive webinars; and**

**(b) A maximum of six (6) hours will be allowed for online education that is pre-recorded or non-interactive.**

**C. Continuing education hours are waived for veterinarians, veterinary technicians, and veterinary technologists who received a license or certificate from the Board during the**

renewal period in which they graduated.

D. The following are approved by the Board for continuing education:

(1) An educational program sponsored by an accredited or approved college of veterinary medicine;

(2) An educational program sponsored by the American Animal Hospital Association;

(3) An educational program sponsored by the American Veterinary Medical Association or one of its recognized veterinary specialties or veterinary specialty organizations;

(4) An educational program sponsored by a local, state, regional or national veterinary association;

(5) An educational program sponsored by the National Association of Veterinary Technicians in America or one of its veterinary technician specialty academies or societies;

(6) An educational program approved by the Registry of Approved Continuing Education (RACE), which is the American Association of Veterinary State Boards' national clearinghouse for approval of continuing education; or

(7) An educational program sponsored by the United States Department of Agriculture.

E. Each veterinarian, veterinary technician, and veterinary technologist must keep a record of continuing education hours earned and will be required to certify those hours on a form provided by the Board. The form will be sent to each veterinarian, veterinary technician, and veterinary technologist at the time of annual renewal. All records of continuing education hours must be kept by the license or certificate holder for three (3) years. The Board, at its discretion, may request an audit of an individual's continuing education records.

F. Veterinarians, veterinary technicians, or veterinary technologists unable to earn continuing education hours because of sickness or other justifiable reasons may, at the discretion of the Board, be exempt from all or part of the continuing education requirements or granted an extension of time to obtain their continuing education hours.

G. Requests for pre-approval of educational programs must be submitted to the Board at least thirty (30) days prior to the meeting – no exceptions.

H. To activate an inactive license or certificate, continuing education hours must be obtained during that renewal period.

**INSPECTION AND MINIMUM STANDARDS OF PRACTICE  
(Adopted: 12/1/1976) (Amended: 11/12/2008) (Effective: 1/1/2009)**

8. The Board or its employees may at any time inspect the premises in which veterinary medicine, veterinary dentistry or veterinary surgery is practiced. All locations where veterinary medicine is practiced shall be adequate for the maintenance of good hygiene at all times. All areas of the premises shall be maintained in a clean, odor free, and orderly condition at all times.

A. The minimum standards for all facilities where veterinary medicine is practiced shall be:

(1) Adequate heating and cooling shall be provided for the comfort of the animals and the facility shall have sufficient ventilation in all areas;

(2) Proper lighting shall be provided in all rooms utilized for the practice of veterinary medicine;

(3) Hot and cold running water shall be provided along with adequate toilets and lavatories for the personnel and for the clients;

(4) All premises shall have sanitary storage which is adequate for the size of the facility;

(5) The facility shall have interior and exterior receptacles for waste disposal which comply with state, county and municipal health laws, ordinances and regulations;

(6) The facilities shall employ a procedure for the prompt, sanitary and aesthetic disposal of dead animals which complies with all state, county and municipal laws, ordinances and regulations. Dead animals, held on premises for longer than six hours, shall be placed in a refrigerator;

(7) All interior spaces in the facility must be clean and orderly;

(8) The facility shall have the capability for use of either in-house or consultant laboratory service for blood chemistry, cultures and antibiotic sensitivity examinations, complete blood counts, histopathological examinations and complete necropsies.

(9) Surgery shall be performed in a manner compatible with current veterinary medical practice with regard to anesthesia, asepsis, life support and monitoring procedures as well as recovery care. At all times, the minimum standards for surgery shall be:

(a) Surgery shall be performed in a room designed and reserved for surgery (this applies to all facilities constructed after 6/23/1993);

(b) The surgery room shall be clean, orderly and well lighted;

(c) Sterilization must include a steam pressure sterilizer or autoclave or gas sterilization equipment. Cold sterilization may be used for field conditions;

(d) Instruments and equipment utilized in the surgery room shall be commensurate with the type of surgical service being provided;

(e) Storage in the surgery room shall be limited to only items and equipment normally related to surgery and surgical procedures;

(f) Emergency drugs must be readily available to the surgery area;

(g) The operating table shall be constructed of a smooth and impervious material;

(h) There shall be a separate surgical preparation area (this applies to all facilities constructed after 6/23/1993);

(i) There shall be available for surgery sterilized instruments, gowns, towels, drapes, gloves, caps and masks;

(j) Regulated oxygen under positive pressure shall be available.

(10) The following minimum standards shall apply to radiography:

(a) Capability and proof of use of either in-house or consultant services for obtaining diagnostic quality radiographs;

(b) Radiology equipment and use shall be in accordance with all federal and state laws;

(c) All personnel using radiology equipment must wear a monitoring device;

(d) Permanent identification tags must appear on all radiographs.

(11) Cages, exercise areas, pens and stalls are to be kept in a clean and orderly condition, in a well-lighted area, and in good repair to prevent injury to animals and to promote physical comfort.

(12) Clinics must make known to the public whether a veterinarian is on-site or on call after hours.

B. Each veterinarian shall have posted or displayed at his office in full view of his clients, his original Arkansas license to practice veterinary medicine and his current year's license renewal certificate.

C. Violation of these or other accepted standards of sanitation or professional practice shall be prima facie evidence of unprofessional conduct or incompetence.

D. In the event a license is revoked or suspended by the Board, the Board may post a notice of its order of revocation or suspension in a conspicuous place or at the business of the licensee.

### **RECORD KEEPING**

**(Adopted: 6/23/1993) (Amended: 11/12/2008) (Effective: 1/1/2009)**

9. Each veterinary medical facility shall comply with the following:

A. **Medical Records:** A legible individual record shall be maintained for each companion animal. However, the medical records for a litter may be recorded either on the dam's record or on a litter record until the individual animals are permanently placed or reach the age of three (3) months. Records for herd or flock animals may be maintained on a group or client basis.

B. **ALL records shall be readily available and must be kept for a period of three (3) years following the last treatment or examination.**

C. **Animal health records shall be the property of the owner or manager of a veterinary practice that has prepared such record and shall include, but are not limited to written records and notes, computer generated records, radiographs, sonographic images, video tapes, photographs, laboratory reports or other diagnostics or case management information received as the result of consulting with other licensed veterinarians or medical specialists.**

D. **Medical records shall be maintained in a manner that will permit any authorized licensed veterinarian to proceed with the care and treatment of the animal, if required, by reading the medical record of that particular patient; the record shall clearly explain the initial examination.**

E. **Patient records shall include, but are not limited to the following information:**

- (1) Name and/or initials of the veterinarian responsible for entries;
- (2) Name, address and telephone number of the owner and/or client;
- (3) Name of patient, number or other identification of the animal and/or herd or flock;
- (4) Species, breed, age, sex, color and distinctive markings;
- (5) Pertinent history and presenting complaint;
- (6) Physical examination findings to include temperature, weight, body condition, respiration, pulse, eyes, ears, nose and throat, oral cavity, respiratory system including auscultation of the thorax, palpation of the abdomen, lymph nodes, and evaluation of musculoskeletal, neurological, genito/urinary systems;

(7) Assessment/diagnosis, treatments and intended treatment plan, medications dispensed or prescribed, immunizations administered, dosages, strength, frequency and route of administration;

(8) Surgical procedures shall include a description of the procedure, name of the surgeon, type of sedative/anesthetic agent(s) used, dosage, strength, and route of administration;

(9) Dated progress of the case while in veterinary medical facility, and if relevant, a prognosis of the animal's condition;

(10) Exposed radiographs shall have permanent facility and animal identification;

(11) If the temperament of the animal precludes any exam or test or if a client waives or declines any examination, test or other recommended treatments, such notation of denial or signed waiver shall be included in the medical record;

(12) All consent statements, surgical, or treatment consent forms should be included in the medical record;

(13) If there are any discharge instructions, they should be noted on the medical record;

(14) Name of any person (other than the veterinarian's own employees) furnishing professional advice, performing treatments, examinations or other services.

F. Medical records for large animal facilities/practices shall be clear, legible, retrievable and maintained on either a herd (flock) or individual basis and contain:

(1) Name and initials, business/farm name, address, and phone number of the owner/agent;

(2) Relevant medical and surgical procedures (including vaccinations given and lab reports) to the individual, group, or herd;

(3) A record of all drugs administered or dispensed including quantity and withdrawal times.

G. A radiograph is the property of the veterinarian who originally ordered it. It shall be released upon the request of another veterinarian and such radiograph shall be returned to the veterinarian who originally ordered it to be prepared within a reasonable time.

#### **PRESCRIPTION DRUGS**

**(Adopted: 6/23/1993) (Amended: 11/12/2008) (Effective: 1/1/2009)**

10. All prescription drugs shall be stored, maintained, administered, dispensed and prescribed in compliance with federal and state laws. Veterinarians who dispense pharmaceuticals must comply with the following minimum standards for drug procedures:

A. Except for labeled manufactured drugs with proper instructions, all drugs dispensed shall be labeled with:

- (1) Name, address and telephone number of the facility,
- (2) Name of client,
- (3) Animal identification,
- (4) Date dispensed,
- (5) Directions for use,
- (6) Name and strength of drug
- (7) Quantity dispensed,
- (8) Name of the prescribing veterinarian, and
- (9) The statement "For Veterinary Use Only".

B. A lay employee may count, fill and label a prescription under the direct order of the veterinarian according to his specific instructions.

C. A record of all drugs administered or dispensed shall be kept in the records of the individual animal if the animal is a companion animal, or in the client's record if the animal is an economic animal.

D. Prescription drugs may not be purchased, advertised, displayed, sold or bartered by veterinarians except in the course of their professional practice. The fact that the individual is a veterinarian does not provide any exception which is not also available to non-veterinarians. Veterinarians who are in the employ of drug manufacturers or distributors and veterinarians who operate their own drug distributorship or sales outlets cannot legally sell prescription drugs or issue prescriptions for them outside the scope of a professional practice.

E. Practicing veterinarians and their employees cannot legally sell prescription drugs to walk-in customers unless a valid veterinarian/client/patient relationship exists. Prescription drugs may only be sold through a retail outlet, by mail order, a route salesman or other sales method on the written order (prescription) of a licensed veterinarian who has established a valid veterinarian/client/patient relationship and that written order (prescription) is filled by a veterinarian or pharmacist currently licensed by the State of Arkansas.

## **CONTROLLED SUBSTANCES**

**(Adopted: 6/23/1993) (Amended: 11/12/2008) (Effective: 1/1/2009)**

11. All controlled substances shall be stored, maintained, administered, dispensed and prescribed in compliance with federal and state laws.

A. Where dispensing or use of controlled substances takes place, an inventory must be conducted every two (2) years and kept as a separate part of your permanent records.

B. The form for keeping records of controlled substances shall contain the following information in addition to the name of the drug:

- (1) Date of acquisition,
- (2) Quantity purchased,
- (3) Date administered, dispensed or prescribed,
- (4) Quantity administered, dispensed or prescribed,
- (5) Name and address of client and patient receiving the drug(s),
- (6) Species of the animal,
- (7) Name or initials of individual who dispensed or administered the drug,
- (8) Balance on hand.

and

C. Records for Schedule II substances must be kept separate from Schedule III, IV and V substances.

D. Inventories and records of narcotic drugs listed in Schedule I, II, III, IV and V shall be maintained separately from all other records or in such form that the information required is readily retrievable from ordinary business records or patient's records.

E. Every veterinarian who is permitted to dispense, distribute, administer or conduct research with respect to controlled substances in the course of professional practice or research in Arkansas shall obtain a registration from the Federal Drug Enforcement Administration, unless exempt by Law.

F. A separate registration is required for each principal place of business or professional practice at one general physical location where controlled substances are maintained, manufactured, distributed or dispensed.

G. All veterinarians shall provide effective controls and procedures to guard against theft and diversion of controlled substances. Controlled substances listed in Schedule I, II, III, IV

and V shall be stored under double lock security in a vault or locking cabinet in a room with limited access.

H. Each veterinarian shall notify the Division of Pharmacy Services and Drug Control, Arkansas Department of Health, immediately upon discovery of any suspected loss, theft and/or diversion of any controlled substance.

I. All controlled substances that are no longer usable because of deterioration or expired dating or are unwanted, must be delivered in person or by registered mail or other means of shipment with return receipt to Division of Pharmacy Services & Drug Control, Arkansas Department of Health, and accompanied by all completed copies of Report of Drugs Surrendered (Form PhA:DC-1) furnished by the Health Department or may be destroyed only by authorized agents of the Arkansas State Board of Pharmacy or the Arkansas Department of Health on site.

J. The only drugs approved by this Board for pre-euthanasia of animals by a certified animal euthanasia technician in a facility approved by the AR Department of Health/Pharmacy Services & Drug Control shall be Acepromazine and Xylazine.

#### **CORPORATIONS**

**(Adopted: 12/1/1976) (Amended: 11/12/2008) (Effective: 1/1/2009)**

12. The standard professional title for a corporate veterinary practice shall be as required by the Professional Corporation Act.
13. Veterinary practice may be by sole practitioners, partnerships, or duly registered corporations. Only licensees may be partners.
14. No corporation may practice or offer to practice unless it holds a current corporate certificate from this Board.

No corporation may do any act which individual licensees are prohibited from doing, and every corporation practicing veterinary medicine shall be subject to all rules and regulations applicable to individual or partnership practice, and subject to all disciplinary powers of the Board.

No veterinarian may practice or offer to practice veterinary medicine as an officer or employee of any corporation which does not hold a valid corporate certificate, nor may he furnish professional services to or through such corporation in such manner as to enable the corporation to evade the requirements of the Practice Act or the rules of this Board. However, a veterinarian employed by a private or public-held corporation may engage in the practice of veterinary medicine on animals owned by that corporation.

The services of any veterinary corporation shall be limited to veterinary services.

#### **ADVERTISING**

**(Adopted: 11/5/1980) (Amended: 5/24/1988)**

15. Advertising means newspaper, magazine and periodical announcements and listings, professional cards, professional announcement cards, office and other signs, letterheads, telephone and other directory listings and any other form of communication designed to inform the general public about the availability, nature or prices of products or services or to attract clients.

“Solicitation” means advertising intentionally directed to specific individuals.

A veterinarian shall not, on behalf of himself, his partner, his associate, or any other veterinarian:

A. Seek to attract any client who has given the veterinarian notice that he does not want to receive communications from the veterinarian;

B. Use, or participate in the use of, any form of advertising or solicitation which contains a false, deceptive or misleading statement or claim.

A false, deceptive or misleading statement or claim includes, without limitation, a statement or claim which:

(1) contains a guarantee that a cure will result from the performance of professional services;

(2) contains a false, deceptive or misleading testimonial or endorsement by a veterinarian;

(3) refers to secret methods of treatment or special services which characterize the ways of a charlatan;

(4) concerns illegal transactions;

(5) is not identified as a paid advertisement or solicitation unless it is apparent from the context that it is a paid advertisement or solicitation;

(6) contains false, deceptive or misleading information concerning performance or case reports;

(7) contains false, deceptive or misleading representation regarding the quality of professional services;

(8) states that a veterinarian is a certified specialist unless he is Board certified in such specialty;

(9) contains a material misrepresentation of fact;

(10) omits to state any material fact necessary to make the statement not

misleading in light of the circumstances under which it is made;

(11) would result in the violation of any law or regulation or a contractual or other obligation of any person through whom the veterinarian seeks to communicate;

(12) contains a representation or implication that is likely to cause an ordinary prudent layperson to misunderstand or be deceived or fails to contain reasonable warning or disclaimers necessary to make a representation or implication not deceptive; or

(13) contains false, deceptive or misleading information relating to professional fees.

### **COMPLAINTS, HEARINGS**

**(Adopted: 12/1/1976) (Amended: 11/12/2008) (Effective: 1/1/2009)**

16. Any and all complaints within the jurisdiction of the Board must be in writing, dated and signed by the complainant, notarized and filed with the Secretary-Treasurer of the Board within one (1) year of the alleged violation. The Executive Secretary, upon receiving a timely complaint, may proceed to investigate said complaint and may take statements from any person thought to have knowledge of and fact(s) pertaining thereto.

17. Any and every complaint making out a prima facie case shall be presented to and reasonably disposed of by the Board, giving due consideration to sufficient and necessary time to investigate and consider the complaint.

18. Disciplinary hearings may be conducted either on the Board's own motion or based on a written complaint if a violation of the Veterinary Medical Practice Act has been discovered.

### **UNPROFESSIONAL CONDUCT**

**(Adopted: 12/1/1976) (Amended: 11/12/2008) (Effective: 1/1/2009)**

19. Unprofessional Conduct as provided for by the Arkansas Code Annotated § 17-101-305 and § 17-101-308 shall consist of any of the following acts:

A. To tender or receive a commission or fee for referral of a patient without disclosing to the client the fact that a commission or fee was tendered or received.

B. A veterinarian may not procure, encourage, or otherwise aid and abet an unlicensed person to engage in the practice of veterinary medicine.

C. To sign or otherwise validate any health certificate without actually, physically inspecting the animal. A health certificate must be dated as of time of examination.

D. A veterinarian shall not write testimonials as to the virtue of drugs, medicines, remedies, or foods except to report the results of properly controlled experiments or clinical studies to interested veterinary organizations or associations.

E. To violate any laws or regulations of either the State of Arkansas or the United States relating to prescription drugs or controlled substances.

F. For a veterinarian to undertake the care of an animal and thereafter fail to render the care as generally accepted by the veterinary profession.

G. To guarantee a cure.

H. To make false or deceptive statements that belittle the knowledge or injure the professional standing of another member of the profession or that unnecessarily condemns the character of his professional acts; provided, however, that nothing herein should be construed to prohibit any truthful, nondeceptive statements, including, but not limited to truthful nondeceptive comparative advertising.

I. The habitual or excessive use of intoxicants or drugs.

J. Aiding or abetting the practice of veterinary medicine by a person not licensed by the Board. This shall include the practice of any veterinarian from knowingly selling or distributing any pharmaceutical drug labeled "For use by or on the order of a licensed veterinarian" or biologicals for the purpose of ultimate resale by someone other than a licensed veterinarian. Improper use of these products constitutes a danger to the public health.

K. Failure to meet continuing educational requirements within any renewal period.

L. Being guilty of any dishonorable or unethical conduct likely to deceive, defraud or harm the public.

M. Refusing to permit the Board or any legal representative of the Board to inspect the business premises of the licensee during regular business hours.

N. Obtaining or attempting to obtain any fee, charge, tuition or other compensation by fraud, deception or misrepresentation.

O. Conduct reflecting unfavorably upon the profession of veterinary medicine.

P. Substance abuse or diversion of pharmaceuticals or materials from veterinary practice to human use.

**LIVESTOCK EMBRYO TRANSFER OR TRANSPLANT; AND LIVESTOCK  
PREGNANCY DETERMINATION  
(Adopted: 4/4/2018) (Effective: 9/1/2018)**

**Definitions:**

20. Certain terms as provided by Ark. Code Ann. § 17-101-316 shall be defined as:

A. "Individual technician" shall be referred to as a non-veterinarian embryo transfer

technician and means a person who performs the biosecure process of inducing increased ovulations within a donor female for the invitro or in vivo production of embryos, the flushing of those embryos, collecting, grading and transferring of those embryos to recipient females, or the cryopreservation of those embryos for storage and later transfer to recipient females.

B. "Livestock embryo transfer or transplant" shall mean services provided by a non-veterinarian embryo transfer technician certified by the Board which involves and shall be limited to nonsurgical embryo transfer in livestock, and may include basic ultrasonography of their ovaries to evaluate the response to embryo transfer associated procedures, and of the uterus to determine pregnancy by the detection of a heartbeat within the transferred embryo at or greater than twenty-eight (28) days of gestation of such animals.

C. "Qualified course" shall mean:

(1) A course on livestock embryo transfer or transplant and livestock pregnancy determination taught by someone with a Doctorate or Master of Science degree with an emphasis in animal reproductive physiology or a Doctor of Veterinary Medicine, or taught through an accredited or approved college of veterinary medicine; or

(2) A Doctorate or Master of Science degree with an emphasis in animal reproductive physiology.

**Application:**

21. The application for certification as a non-veterinarian embryo transfer technician in the State of Arkansas shall be written and signed by the applicant, and include the information set forth below and shall be accompanied by a nonrefundable one thousand dollar (\$1,000.00) application fee:

A. One (1) letter from a licensed veterinarian who has witnessed the applicant's ability to perform livestock embryo transfer or transplant and livestock pregnancy determination on at least three (3) occasions within six (6) consecutive months. The letter shall include the dates that the veterinarian spent with the applicant and an endorsement certifying that the applicant is proficient in the following areas:

(1) Basic knowledge, skills, and abilities required to proficiently extract, grade, freeze, thaw, and transfer livestock embryos; and

(2) The ability to properly use ultrasound equipment in determining pregnancy status with at least ninety percent (90%) accuracy beginning at sixty (60) days of pregnancy and with at least ninety percent (90%) accuracy when identifying trimester;

B. A record of successfully completing a qualified course taught by a livestock reproduction specialist on both livestock embryo transfer and livestock pregnancy determination;

C. Proof that the applicant has at least fifty percent (50%) financial interest in

livestock management equipment, including without limitation ultrasound equipment, microscope, embryo freezer, and other required transfer tools; and

D. Proof of membership in either the International Embryo Technology Society or the American Embryo Transfer Association.

**Renewal:**

22. A certification under this section expires after two (2) years and the non-veterinarian embryo transfer technician shall submit the following to the Board for renewal:

A. A renewal application;

B. A renewal application fee of two hundred fifty dollars (\$250.00); and

C. A record of completing a continuing education course on bovine reproduction within the United States of America or Canada.

**Continuing Education:**

23. Non-veterinarian embryo transfer technicians are required to earn eight (8) credit hours before becoming eligible for renewal. Those hours shall be completed within the United States of America or Canada through the following:

A. The annual conference of the International Embryo Technology Society;

B. The annual convention of the American Embryo Transfer Association; or

C. Another course on bovine reproduction pre-approved by the Board.

**Record Keeping:**

24. A non-veterinarian embryo transfer technician shall keep and maintain a record that contains the contact information of the licensed veterinarian prescribing or dispensing prescription drugs who has a valid veterinarian-client-patient-relationship with the livestock owner when the prescription drugs are administered by the technician.

**PRESCRIBING CONTROLLED SUBSTANCES**

**(Adopted: 9/21/2018) (Effective: 1/1/2019)**

25. A controlled substance will mean a Schedule II-V drug as defined in the Prescription Drug Monitoring Program Act.

A. Examination of the patient and need for prescribing a controlled substance.

(1) Nonpharmacologic treatment or drugs that are not classified as a controlled

substance will be given consideration prior to treatment with controlled substances. Prior to initiating treatment with a controlled substance, the licensed veterinarian will perform a history and physical examination appropriate to the presenting complaint and conduct an assessment of the patient's history as part of the initial examination.

(2) The medical record for prescribing controlled substances will include signs or presentation of the pain or condition, a presumptive diagnosis for the origin of the pain or condition, a physical examination appropriate to the presenting complaint, a treatment plan, and the medications prescribed to include the date, type, dosage, and quantity prescribed.

(3) If a controlled substance is necessary for treatment, the licensed veterinarian will prescribe it in the lowest effective dose appropriate to the size and species of the animal for the least amount of time.

(4) If the prescribing is within the accepted standard of care, a licensed veterinarian may prescribe a controlled substance for the management of behavioral disorders, neurological disorders, acute pain, chronic pain, terminal illnesses, or other chronic conditions.

B. For prescribing an opioid, the initial dose will not exceed a ten (10) day supply.

(1) For prescribing an opioid for the management of pain after the initial ten (10) day supply, the patient will be seen and evaluated for the continued need for an opioid.

(2) For any prescribing of an opioid beyond ten (10) days, the licensed veterinarian will develop a treatment plan for the patient, which will include measures to be used to determine progress in treatment, further diagnostic evaluations or modalities that might be necessary, and the extent to which the disorder, pain, or condition is associated with physical impairment.

(3) For the continued prescribing of an opioid, the patient will be seen and reevaluated at least every six (6) months. The justification for such prescribing will be documented in the patient record.

C. Prior to prescribing or dispensing a controlled substance, the licensed veterinarian will document a discussion with the owner about the known risks and benefits of treatment with a controlled substance, the responsibility for the security of the drug, and proper disposal of any unused drug.

D. Continuation of treatment with controlled substances will be supported by documentation of the continued benefit from the prescribing. For the continued prescribing of controlled substances that are not opioids, the patient will be seen and reevaluated at least every twelve (12) months. If the patient's progress is unsatisfactory, the licensed veterinarian will assess the appropriateness of the continued use of the current treatment plan and consider the use of other therapeutic modalities.

**VETERINARY TECHNOLOGY – LEVELS OF SUPERVISION**  
**(Adopted: 4/30/2020) (Effective: 7/18/2020)**

26. A veterinary technician or veterinary technologist who has obtained a certificate of qualification from the Board may be allowed to perform the following acts under the direction, supervision, and responsibility of a licensed veterinarian, who has established the veterinarian-client-patient relationship, and will comply with the record keeping rule established by the Board.

**A. Immediate supervision:**

- (1) Surgical assistance to a licensed veterinarian; and
- (2) Dental extractions not requiring sectioning of a tooth or the resection of bone.

**B. Direct supervision:**

- (1) Any task or procedure that requires an animal to be under anesthesia;
- (2) Induction, maintenance, and monitoring of anesthesia;
- (3) Suturing of skin incisions made by a licensed veterinarian;
- (4) Dental procedures limited to the following:
  - (a) Removal of calculus, soft deposits, plaque, and stains;
  - (b) Smoothing, filing, and polishing teeth;
- (5) Blood or blood component collection, preparation and administration for blood transfusion; and
- (6) Performance of any veterinary technology duties at a livestock auction.

**C. Indirect supervision:**

- (1) Obtain history and perform a physical examination of an animal patient;
- (2) Collection of blood for diagnostic laboratory tests, except when in conflict of a state or federal law or regulation;
- (3) Collection and preparation of tissue, cellular, or microbiological samples by skin scrapings, impressions, or other non-surgical methods, except when in conflict of a state or federal law or regulation;
- (4) Collection of urine by free catch, expression, cystocentesis, or catheterization

(unobstructed) and inserting an indwelling urinary catheter;

(5) Collection of fluid by abdominocentesis, arthrocentesis, or thoracentesis;

(6) Performing laboratory procedures;

(7) Intravenous catheterization;

(8) Administration of parenteral fluid therapy;

(9) Radiograph, ultrasound, EKG, or other diagnostic imaging or monitoring;

(10) Ocular tonometry, Schirmer tear test, fluorescein staining;

(11) Administration and application of:

(a) Treatments, drugs, medications, and immunological agents by parenteral (subcutaneous, intramuscular, intraperitoneal, intraarticular, and intravenous) and non-parenteral routes, except when in conflict of a state or federal law or regulation;

(b) Splints, bandages, and wound dressings;

(12) Measure and prepare medication for dispensing to clients on the order of a licensed veterinarian;

(13) Pregnancy checking of food animals with or without equipment, rectal palpation, artificial insemination, correcting of uterine prolapse, uncomplicated fetal extractions excluding fetotomies and cesarean sections;

(14) Routine, non-surgical food animal management practices including castration, dehorning, tail docking, and ear notching; and

(15) Wound management and care.

**MILITARY AUTOMATIC LICENSURE**  
**(Adopted: 4/30/2020) (Effective: 7/18/2020)**

27. As used in this subsection, "automatic licensure" means the granting of occupational licensure without an individual's having met occupational licensure requirements provided under Title 17 of the Arkansas Code or by these Rules, and "returning military veteran" means a former member of the United States Armed Forces who was discharged from active duty under circumstances other than dishonorable.

A. The Board must grant automatic licensure to an individual who holds a substantially equivalent occupational license in good standing in another state, territory, or district of the United States and is:

- (1) An active duty military service member stationed in Arkansas;
- (2) A returning military veteran applying for an occupational license within one (1) year of his or her discharge from active duty; or
- (3) The spouse of a person under A. (1) or (2) above.

B. The Board must grant such automatic licensure upon receipt of all items listed below:

- (1) Evidence that the applicant is a holder in good standing of a substantially equivalent occupational license in another state, territory, or district of the United States; and
- (2) Evidence that the applicant is a qualified applicant under A. (1), (2), or (3) above.

**PRE-LICENSURE CRIMINAL BACKGROUND CHECK AND WAIVER REQUEST**  
(Adopted: 9/11/2019) (Effective: 7/18/2020)

**28. Pre-licensure criminal background check:**

A. Pursuant to Ark. Code Ann. §17-2-103, an individual may petition for a pre-licensure determination of whether the individual's criminal record will disqualify the individual from an occupational license and whether a waiver may be obtained.

B. The individual must obtain a pre-licensure criminal background check petition form from the Board.

C. The Board will respond with a decision, in writing, to a completed petition within a reasonable amount of time.

D. The Board's response will state the reason(s) for the decision.

E. All decisions of the Board in response to the petition will be determined by the information provided by the individual.

F. Any decision made by the Board in response to a pre-licensure criminal background check petition is not subject to appeal.

G. The Board will retain a copy of the petition and response, which will be reviewed during the formal application process.

**29. Waiver Request:**

A. If an individual has been convicted of an offense listed in Ark. Code Ann. §17-2-102(a), except those permanently disqualifying offenses found in subsection (e), the Board may

waive disqualification of a potential applicant or revocation of a license based on the conviction if a request for waiver is made by:

- (1) An affected applicant for an occupational license; or
- (2) An individual holding an occupational license subject to revocation.

B. The Board may grant a waiver upon consideration of the following, without limitation:

- (1) The age at which the offense was committed;
- (2) The circumstances surrounding the offense;
- (3) The length of time since the offense was committed;
- (4) Subsequent work history since the offense was committed;
- (5) Employment references since the offense was committed;
- (6) Character references since the offense was committed;
- (7) Relevance of the offense to the occupational license; and
- (8) Other evidence demonstrating that licensure or certification of the applicant does not pose a threat to the health or safety of the public.

C. A request for waiver, if made by an applicant, must be in writing and accompany the completed application and fee.

D. The Board will respond with a decision, in writing, and will state the reason(s) for the decision.

E. An appeal of a determination under this section will be subject to the Administrative Procedures Act §25-15-201 *et seq.*

**RECIPROCITY AND TEMPORARY PERMITS**  
**(Adopted: 9/11/2019) (Effective: 7/18/2020)**

**30. Reciprocity for Veterinarians:**

A. A veterinarian applying for reciprocal licensure must meet the following requirements:

- (1) The applicant must hold a substantially similar license to practice veterinary medicine in another jurisdiction of the United States.

(a) A license from another jurisdiction of the United States is substantially similar to an Arkansas license to practice veterinary medicine if the other jurisdiction's licensure qualifications require:

(i) A diploma from an accredited or approved college of veterinary medicine; or

(ii) A certificate from either the Educational Commission for Foreign Veterinary Graduates or the Program for the Assessment of Veterinary Education Equivalence.

(b) The applicant's license in another jurisdiction of the United States must be in good standing;

(c) The applicant's license in another jurisdiction of the United States must not be held in a suspended or probationary status;

(d) The applicant's license in another jurisdiction of the United States must not have been revoked for an act of bad faith or a violation of a law, rule, or ethics; and

(2) The applicant must have passed the National Board Examination, Clinical Competency Test, North American Veterinary Licensing Examination, or a future equivalent.

B. A veterinarian must submit a completed application as described in Ark. Code Ann. §17-101-301, the required fee(s), and the following documentation:

(1) As evidence that the applicant's license from another jurisdiction of the United States is substantially similar to an Arkansas license to practice veterinary medicine, the applicant must submit the following:

(a) Evidence of a current and active license in that jurisdiction; and

(b) Evidence that the jurisdiction's licensure requirements match those listed in A. (1) (a) (i) or (ii).

(2) As evidence that the applicant meets the requirements in A. (1) (b) through (d), the applicant must submit the following:

(a) The names of all jurisdictions of the United States in which the applicant is currently or has been previously licensed; and

(b) A primary source license verification from each of those jurisdictions.

(3) As evidence that the applicant meets the requirement in A. (2), the applicant must transfer his or her score on the National Board Examination, Clinical Competency Test, North American Veterinary Licensing Examination, or a future equivalent, to the Board through the American Association of Veterinary State Boards, or its future equivalent.

**31. Temporary Permits for Veterinarians:**

A. A temporary permit will be issued to a veterinarian immediately upon receipt of the application, the required fee(s), and the documentation required under paragraph 30. B. 1. (a) and (b).

B. If the Board determines that the applicant meets the requirements for reciprocal licensure as described in paragraph 30. A. (1) through (2), a license will be issued upon the receipt of all required documentation listed in paragraph 30. B. (1) through (3).

C. If the Board determines that the applicant does not meet the requirements for reciprocal licensure as described in paragraph 30. A. (1) through (2), the applicant may still apply for licensure by examination.

**32. Reciprocity for Veterinary Technicians and Veterinary Technologists:**

A veterinary technician or veterinary technologist applying for reciprocal certification will follow the process outlined in Ark. Code Ann. §17-101-306.

**Statutes**

**Ark. Code Ann. § 17-101-305:**

**(a) Upon written complaint by any person or on the Arkansas Livestock and Poultry Commission's own motion and after notice and hearing as prescribed in the Arkansas Administrative Procedure Act, § 25-15-201 et seq., the commission may deny, suspend for a definite period, revoke the license of any veterinarian, or impose a civil penalty for:**

**(5) Incompetence, gross negligence, or other malpractice in the practice of veterinary medicine;**

...

**(11) Unprofessional conduct by violation of a rule promulgated by the commission under this chapter;**

**Ark. Code Ann. § 25-15-212 (a) & (c)**

**(a) In cases of adjudication, any person, except an inmate under sentence to the custody of the Division of Correction, who considers himself or herself injured in his or her person, business, or property by final agency action shall be entitled to judicial review of the action under this subchapter. Nothing in this section shall be construed to limit other means of review provided by law.**

...

**(c) The filing of the petition does not automatically stay enforcement of the agency decision, but the agency or reviewing court may do so upon such terms as may be just. However, on review of disciplinary orders issued by professional licensing boards governing professions of the healing arts, the reviewing court, only after notice and hearing, may issue all necessary and appropriate process to postpone the effective date of an agency action or to preserve status or rights pending conclusion of review proceedings.**

**Ark. Code Ann. § 17-101-203 (1)-(2), (4), (9), & (10)-(11):**

**The Arkansas Livestock and Poultry Commission shall have the power to:**

**(1) Examine and determine the qualifications and fitness of applicants for a license to practice general veterinary medicine or any specialty area thereof, and the certification of veterinary technicians in Arkansas, and issue, renew, deny, suspend, or revoke licenses or certificates, or otherwise discipline veterinarians or veterinary technicians;**

**(2) Subpoena witnesses and take testimony bearing on the records of applicants for permits or for licenses to practice veterinary medicine in the State of Arkansas;**

...

**(4) Conduct investigations into matters brought before the commission and proceed on the commission's own motion to a hearing or other disciplinary action;**

...

**(9) Regulate all veterinarians in a corporate practice and prevent corporate or noncorporate holdings from being sold to, directed by, or controlled by a nonveterinarian;**

**(10)(A) Hold hearings on all matters properly brought before the commission and, in connection thereto, administer oaths, receive evidence, make the necessary determinations, and enter orders consistent with the findings.**

**(B) The commission may require by subpoena the attendance and testimony of witnesses and the production of papers, records, or other documentary evidence and commission depositions;**

**(11) Bring proceedings in the courts for the enforcement of this chapter or any rules made under this chapter;...**

**Arkansas Livestock & Poultry Commission**

**Dockets No. 2019-20 & 2020-04**

**Index of Exhibits**

**Arkansas Department of Agriculture**

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# ARKANSAS DEPARTMENT OF AGRICULTURE



Sarah Huckabee Sanders  
Governor

1 Natural Resources Drive, Little Rock, AR 72205  
agriculture.arkansas.gov  
(501) 225-1598

Wes Ward  
Secretary of Agriculture

August 9, 2024

**VIA EMAIL and U.S. CERTIFIED MAIL 7021 0950 0000 0885 6256**

Mr. Lloyd "Tre" Kitchens  
The Brad Hendricks Law Firm  
500 C Pleasant Valley Drive  
Little Rock, AR 72227  
[tkitchens@bradhendricks.com](mailto:tkitchens@bradhendricks.com)

Mr. Kitchens:

This letter and the attached Hearing Notice shall serve as proper service of a hearing scheduled for Docket No. 2019-20 and 2020-04 on November 5, 2024, at 8:00 a.m. under the "Administrative Procedure Act" Ark. Code Ann. § 25-15-201, *et. seq.*

Please send any briefs, motions, or other pleadings you deem necessary to Kara Maack, Legal Services Specialist, at [kara.m.maack@agriculture.arkansas.gov](mailto:kara.m.maack@agriculture.arkansas.gov) or by mail at:

Arkansas Department of Agriculture  
ATTN: Kara Maack  
1 Natural Resources Drive  
Little Rock, AR 72205

Please submit all pleadings and other documents before seven (7) days prior to the hearing date. Please also forward these notices to your client for his prompt attention.

Respectfully,

Tanner Thomas  
Managing Attorney



**BEFORE THE ARKANSAS LIVESTOCK AND POULTRY COMMISSION**

**IN THE MATTER OF  
ROBERT G. ZEPECKI, DVM**

**Docket Nos. 2019-20  
& 2020-04**

**NOTICE OF HEARING**

The Arkansas Livestock and Poultry Commission (Commission) will conduct a hearing to determine whether Robert G. Zepecki, DVM (Respondent) has violated Ark. Code Ann. § 17-101-305, *et. seq* and the Rules of the Arkansas Veterinary Medical Examining Board.

Legal authority and jurisdiction for the Commission is found in Ark. Code Ann. § 2-33-107, Ark. Code Ann. § 17-101-203, and the "Arkansas Administrative Procedure Act," Ark. Code Ann. § 25-15-201 *et seq.*

**ALLEGATIONS OF FACT**

1. On May 23, 2022, the Veterinary Medical Examining Board (Board) issued an Order requiring Respondent to complete ten (10) hours of continuing education in record keeping within six (6) months of the date of the Order, submit six (6) records of medical cases per month for twenty-four (24) months beginning in June 2022, and pay two (2) civil penalties of \$5,000 respectively;
2. Respondent filed for Judicial Review on June 7, 2022, and the Arkansas Department of Agriculture (Department) filed a response on July 7, 2022;
3. The Arkansas Court of Appeals dismissed the case without prejudice on August 7, 2023;
4. Respondent has not complied with the Order of the Board.

**APPLICABLE LAW**

1. Ark. Code Ann. § 17-101-203 (1)-(11):
  - o The Arkansas Livestock and Poultry Commission shall have the power to:
    - (1) Examine and determine the qualifications and fitness of applicants for a license to practice general veterinary medicine or any specialty area thereof, and the certification of veterinary technicians in Arkansas, and issue, renew, deny, suspend, or revoke licenses or certificates, or otherwise discipline veterinarians or veterinary technicians;
    - (2) Subpoena witnesses and take testimony bearing on the records of applicants for permits or for licenses to practice veterinary medicine in the State of Arkansas;

(3) Establish annually a schedule of license and permit fees based on the commission's financial requirements for the ensuing year;

(4) Conduct investigations into matters brought before the commission and proceed on the commission's own motion to a hearing or other disciplinary action;

(5) [Repealed.]

(6) Purchase or rent necessary office space, equipment, and supplies;

(7) Promulgate and enforce rules necessary to establish recognized standards for the practice of veterinary medicine and to carry out the provisions of this chapter. The commission shall make available to interested members of the public copies of this chapter and all rules promulgated by the commission;

(8) Examine and evaluate qualifications of education, skill, and experience for certification of a person as a veterinary technician and for annual registration of employment;

(9) Regulate all veterinarians in a corporate practice and prevent corporate or noncorporate holdings from being sold to, directed by, or controlled by a nonveterinarian;

(10)(A) Hold hearings on all matters properly brought before the commission and, in connection thereto, administer oaths, receive evidence, make the necessary determinations, and enter orders consistent with the findings.

(B) The commission may require by subpoena the attendance and testimony of witnesses and the production of papers, records, or other documentary evidence and commission depositions;

(11) Bring proceedings in the courts for the enforcement of this chapter or any rules made under this chapter; and...

2. Ark. Code Ann. § 17-101-305:

- o Upon written complaint by any person or on the Arkansas Livestock and Poultry Commission's own motion and after notice and hearing as prescribed in the Arkansas Administrative Procedure Act, § 25-15-201 et seq., the commission may deny, suspend for a definite period, revoke the license of any veterinarian, or impose a civil penalty for:

(18) Failure to comply with any subpoena or subpoena duces tecum from the commission, or an order of the commission.

**CHARGES**

Based upon evidence obtained by the Arkansas Department of Agriculture, Respondent is charged with violating Ark. Code Ann. § 17-101-305 (a)(18) by:

- (1) Non-compliance with the Order.

**TIME AND PLACE OF HEARING**

The hearing will commence at 8:00 a.m. on November 5, 2024, in the Arkansas Department of Agriculture's Main Conference Room.

For any questions contact the Arkansas Department of Agriculture by phone at (501) 225-1598, email at [info@agriculture.arkansas.gov](mailto:info@agriculture.arkansas.gov), or in writing to 1 Natural Resources Drive, Little Rock, AR 72205.

You may be heard in person, may be represented by counsel, may cross-examine witnesses, and may offer witnesses and documentary evidence in defense of the allegations and charges contained herein.

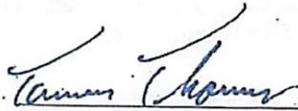


Patrick Eisk  
Director  
Arkansas Livestock and Poultry Commission

**CERTIFICATE OF SERVICE**

I, Tanner Thomas, attorney for the Arkansas Department of Agriculture, do hereby certify that I have served a copy of the foregoing order by mailing a copy of same, by email and by certified mail, with return receipt requested and postage prepaid, on this 9<sup>th</sup> day of August, 2024 to:

Lloyd W. "Tre" Kitchens, Esq.  
The Brad Hendricks Law Firm  
500 C Pleasant Valley Drive  
Little Rock, AR 72227  
[tkitchens@bradhendricks.com](mailto:tkitchens@bradhendricks.com)



Tanner Thomas  
Managing Attorney  
Arkansas Department of Agriculture

**SENDER: COMPLETE THIS SECTION**

- Complete Items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Lloyd "Tre" Kitchens  
 The Brad Hendricks Law Firm  
 500 C Pleasant Valley Drive  
 Little Rock, AR 72227



2. Article Number (Transfer from service label)

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A. Signature

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- Adult Signature Required 0.00
- Adult Signature Restricted Delivery 0.00

Postage \$

Total Postage and Fees \$

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 Street and Apt. No., PO Box No. *500 C Pleasant Valley Dr*  
 City, State, ZIP+4® *Little Rock, AR 72227*

PS Form 3811, April 2016 PSN 7530-02-000-9053 See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete Items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Lloyd "Tre" Kitchens  
 The Brad Hendricks Law Firm  
 500 C Pleasant Valley Drive  
 Little Rock, AR 72227



2. Article Number (Transfer from service label)

7021 0950 0000 0885 6256

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X *Chandra Muma*  Agent  Addressee

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If YES, enter delivery address below:

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 By: *Legal*

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  - Adult Signature Restricted Delivery
  - Certified Mail®
  - Certified Mail Restricted Delivery
  - Collect on Delivery
  - Collect on Delivery Restricted Delivery
  - Insured Mail
  - Insured Mail Restricted Delivery (over \$500)
  - Priority Mail Express®
  - Registered Mail™
  - Registered Mail Restricted Delivery
  - Signature Confirmation™
  - Signature Confirmation Restricted Delivery

PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt



Sarah Huckabee Sanders  
Governor

## ARKANSAS DEPARTMENT OF AGRICULTURE

1 Natural Resources Drive, Little Rock, AR 72205  
agriculture.arkansas.gov  
(501) 225-1598



Wes Ward  
Secretary of Agriculture

October 29, 2024

Mr. Lloyd W. "Tre" Kitchens  
The Brad Hendricks Law Firm  
500 C Pleasant Valley Drive  
Little Rock, AR 72227

Dear Mr. Kitchens:

The matters of Docket Nos. 2022-05 and 2019-20/2020-04 have been continued to December 12, 2024. Enclosed with this letter is an amended notice of hearing with the correct date and time for both hearings.

1. Docket No. 2022-05 will commence at 10:00 a.m. on December 12, 2024;
2. Docket No. 2019-20 & 2020-04 will commence at 1:00 p.m. on December 12, 2024.

Please contact the Arkansas Department of Agriculture should you have any further questions.

Respectfully,

Tanner Thomas  
Managing Attorney

Enclosure

**BEFORE THE ARKANSAS LIVESTOCK AND POULTRY COMMISSION**

**IN THE MATTER OF  
ROBERT G. ZEPECKI, DVM**

**Docket Nos. 2019-20  
& 2020-04**

**AMENDED NOTICE OF HEARING**

The Arkansas Livestock and Poultry Commission (Commission) will conduct a hearing to determine whether Robert G. Zepecki, DVM (Respondent) has violated Ark. Code Ann. § 17-101-305, *et. seq* and the Rules of the Arkansas Veterinary Medical Examining Board.

Legal authority and jurisdiction for the Commission is found in Ark. Code Ann. § 2-33-107, Ark. Code Ann. § 17-101-203, and the "Arkansas Administrative Procedure Act," Ark. Code Ann. § 25-15-201 *et seq*.

**ALLEGATIONS OF FACT**

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2. Respondent filed for Judicial Review on June 7, 2022, and the Arkansas Department of Agriculture (Department) filed a response on July 7, 2022;
3. The Arkansas Court of Appeals dismissed the case without prejudice on August 7, 2023;
4. Respondent has not complied with the Order of the Board.

**APPLICABLE LAW**

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  - o The Arkansas Livestock and Poultry Commission shall have the power to:
    - (1) Examine and determine the qualifications and fitness of applicants for a license to practice general veterinary medicine or any specialty area thereof, and the certification of veterinary technicians in Arkansas, and issue, renew, deny, suspend, or revoke licenses or certificates, or otherwise discipline veterinarians or veterinary technicians;
    - (2) Subpoena witnesses and take testimony bearing on the records of applicants for permits or for licenses to practice veterinary medicine in the State of Arkansas;

(3) Establish annually a schedule of license and permit fees based on the commission's financial requirements for the ensuing year;

(4) Conduct investigations into matters brought before the commission and proceed on the commission's own motion to a hearing or other disciplinary action;

(5) [Repealed.]

(6) Purchase or rent necessary office space, equipment, and supplies;

(7) Promulgate and enforce rules necessary to establish recognized standards for the practice of veterinary medicine and to carry out the provisions of this chapter. The commission shall make available to interested members of the public copies of this chapter and all rules promulgated by the commission;

(8) Examine and evaluate qualifications of education, skill, and experience for certification of a person as a veterinary technician and for annual registration of employment;

(9) Regulate all veterinarians in a corporate practice and prevent corporate or noncorporate holdings from being sold to, directed by, or controlled by a nonveterinarian;

(10)(A) Hold hearings on all matters properly brought before the commission and, in connection thereto, administer oaths, receive evidence, make the necessary determinations, and enter orders consistent with the findings.

(B) The commission may require by subpoena the attendance and testimony of witnesses and the production of papers, records, or other documentary evidence and commission depositions;

(11) Bring proceedings in the courts for the enforcement of this chapter or any rules made under this chapter; and...

2. Ark. Code Ann. § 17-101-305:

- o Upon written complaint by any person or on the Arkansas Livestock and Poultry Commission's own motion and after notice and hearing as prescribed in the Arkansas Administrative Procedure Act, § 25-15-201 et seq., the commission may deny, suspend for a definite period, revoke the license of any veterinarian, or impose a civil penalty for:

(18) Failure to comply with any subpoena or subpoena duces tecum from the commission, or an order of the commission.

**CHARGES**

Based upon evidence obtained by the Arkansas Department of Agriculture, Respondent is charged with violating Ark. Code Ann. § 17-101-305 (a)(18) by:

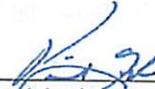
- (1) Non-compliance with the Order.

**TIME AND PLACE OF HEARING**

The hearing will commence at 1:00 p.m. on December 12, 2024, in the Arkansas Department of Agriculture's Main Conference Room.

For any questions contact the Arkansas Department of Agriculture by phone at (501) 225-1598, email at [info@agriculture.arkansas.gov](mailto:info@agriculture.arkansas.gov), or in writing to 1 Natural Resources Drive, Little Rock, AR 72205.

You may be heard in person, may be represented by counsel, may cross-examine witnesses, and may offer witnesses and documentary evidence in defense of the allegations and charges contained herein.

  
\_\_\_\_\_  
Patrick Fisk  
Director  
Arkansas Livestock and Poultry Commission

**CERTIFICATE OF SERVICE**

I, Tanner Thomas, attorney for the Arkansas Department of Agriculture, do hereby certify that I have served a copy of the foregoing order by mailing a copy of same, by email and by certified mail, with return receipt requested and postage prepaid, on this 29 day of October, 2024 to:

Lloyd W. "Tre" Kitchens, Esq.  
The Brad Hendricks Law Firm  
500 C Pleasant Valley Drive  
Little Rock, AR 72227  
[tkitchens@bradhendricks.com](mailto:tkitchens@bradhendricks.com)

  
\_\_\_\_\_  
Tanner Thomas  
Managing Attorney  
Arkansas Department of Agriculture

**BEFORE THE ARKANSAS VETERINARY MEDICAL EXAMINING BOARD**

**IN THE MATTER OF  
ROBERT G. ZEPECKI, DVM  
VILLAGE ANIMAL GROUP, INC.**

**DOCKET NO. 2019-20  
DOCKET NO. 2020-04**

**FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER**

After notice to Robert G. Zepecki, DVM (hereinafter referred to as "Respondent"), the Arkansas Veterinary Medical Examining Board (hereinafter referred to as the "Board"), held a hearing on the above-referenced matter on May 3, 2022, at 1 Natural Resources Drive, Little Rock, AR, 72205. Respondent appeared personally and was represented by his attorney, Lloyd W. "Tre" Kitchens. Managing Attorney Michael Bynum appeared on behalf of the Board. After considering all evidence presented at the hearing, the Board makes the following Findings of Fact, Conclusions of Law and Order.

**FINDINGS OF FACT**

1. Respondent has been a licensed veterinarian since February 24, 1979, under Arkansas license number 1424.

**Docket No. 2019-20**

2. A complaint was filed with the Board against Respondent by Ms. Julianne Henderson ("Complainant 1") on November 19, 2019.
3. On October 24, 2019, Complainant 1 dropped off her 4-year-old spayed, female cat, Lucy, to Respondent because Lucy was frequently using the litter box but not producing much urine.
4. Respondent ordered radiographs, blood work (CBC and spot chem) and a urinalysis. There was no documentation of a physical examination in Lucy's medical record except for a temperature of 102.8 at the time of examination. Respondent failed to include the following examination findings in the patient's medical record: weight, body condition, respiration, pulse, eyes, ears, nose and throat, oral cavity, respiratory system including auscultation of the thorax, palpation of the abdomen, lymph nodes, and evaluation of musculoskeletal, neurological, and genito/urinary systems.



**Docket No. 2020-04**

5. A complaint was filed with the Board against Respondent by Ms. Alyssa Easterling ("Complainant 2") on June 10, 2020.
6. Complainant 2 presented her 10-week-old, male cat, Simba, to Respondent on May 15, 2020, for a neuter and declaw surgery. Complainant 2 was at the time of the surgery employed by Respondent and was present to assist with the procedure. According to Complainant 2, Simba's anus was injured during this procedure, making defecation difficult post-surgery. Complainant 2 assisted with closure of the incision by holding the affected area while the veterinary assistant closed the incision. Respondent was not present for the incision closure.
7. On May 18, 2020, Cassie Hooper, the veterinary assistant that sutured Simba's incision, contacted Claire Kelly, DVM, and reported their concerns about Simba's surgical site. Dr. Kelly examined and operated on Simba the same day to repair a wound dehiscence and found two (2) small testicles. Dr. Kelly neutered the kitten, placed the tissue in formalin, and gave it to Complainant 2.
8. Complainant 2 submitted the tissue sample to the Arkansas Veterinary Diagnostic Laboratory for testing on January 12, 2021. The sample was reported to be small inactive testis.
9. Respondent was given the opportunity to answer the complaint from Complainant 2 on June 10, 2020, with follow up questions sent on October 20, 2020. In his initial answer, Respondent used inaccurate anatomical terms, like vestibule and vaginal vault, which is typically reserved for annotation of female genitalia or the opening of a cavity or space. Respondent also asserted that he "never sutures neuter incisions on male cats," despite having recorded in patient records that "two testicles was [sic] successfully removed with three nylon sutures added." These inconsistencies prompted Board staff to seek third-party review of the complaint file.
10. Subsequent third-party review of Simba's patient records determined that Simba was not neutered by Respondent. In addition, Respondent's medical records were lacking significantly and did not include any type of surgery report.
11. On February 2, 2022, Respondent's employee stated in a response to a communication with Board staff that "our timely response was hindered due to

Dr. Zepecki's recent hospitalization for a heart condition" and "once again, we apologize for the delay, as it was out of Dr. [Zepecki's] control."

12. In response to the original Notice of Hearing served in this matter, Respondent's representative requested a continuance on March 22, 2022, stating as the justification for the continuance that Respondent was unable to assist in the preparation for the case due to a physical condition, indicating that Respondent's physical condition or illness persists.

### CONCLUSIONS OF LAW

1. The Board has the duty and responsibility to regulate the profession of veterinary medicine pursuant to Ark. Code Ann. § 17-101-101 *et seq.*
2. Pursuant to Ark. Code Ann. § 17-101-203, the Board has the power to conduct investigations into matters brought before the Board and to proceed on the Board's own motion to a hearing or other disciplinary action.
3. Respondent's actions, as set forth in paragraphs 1 through 4 of the Findings of Fact in the matter of Docket No. 2019-20, constitute a violation of Ark. Code Ann. § 17-101-305 (a) (11) and Board Rule 9. E. (6) in that Respondent failed to maintain adequate medical records.
4. The Board finds that Respondent committed Charge 1 in the Order and Notice of Hearing in the matter of Docket No. 2019-20.
5. Respondent's actions, as set forth in paragraphs 5 through 12 of the Findings of Fact in the matter of Docket No. 2020-04, constitute a violation of Ark. Code Ann. § 17-101-305 (a) (11) and Board Rule 9. E. (6) in that Respondent failed to maintain adequate medical records.
6. The Board finds that Respondent committed Charge 2 in the Order and Notice of Hearing in the matter of Docket No. 2020-04.
7. Respondent's actions, as set forth in paragraphs 5 through 12 of the Findings of Fact in the matter of Docket No. 2020-04, constitute a violation of Ark. Code Ann. § 17-101-305 (a) (5) in that Respondent acted with incompetence, gross negligence, or other malpractice in the practice of veterinary medicine.

8. The Board finds that Respondent committed Charge 3 in the Order and Notice of Hearing in the matter of Docket No. 2020-04.
9. Respondent's actions, as set forth in paragraphs 5 through 12 of the Findings of Fact in the matter of Docket No. 2020-04, constitute a violation of Ark. Code Ann. § 17-101-305 (a) (11) and Board Rule 19. F. in that Respondent undertook the care of an animal and thereafter failed to render the care as generally accepted by the veterinary profession.
10. The Board finds that Respondent committed Charge 4 in the Order and Notice of Hearing in the matter of Docket No. 2020-04.

#### **ORDER**

It is therefore ordered that:

1. For Charge 1, Respondent shall complete ten (10) hours of continuing education in record keeping within six (6) months of the date of this Order.
2. For Charge 2, Respondent shall submit to the Board six (6) records of medical cases per month for twenty-four (24) months beginning in June 2022.
3. For Charge 3, Respondent shall pay a civil penalty in the amount of five thousand dollars (\$5,000.00).
4. For Charge 4, Respondent shall pay a civil penalty in the amount of five thousand dollars (\$5,000.00).

Pursuant to Ark. Code Ann. § 25-15-212, Respondent may petition for judicial review of this decision by filing a petition in the Circuit Court in which he resides or does business or in the Circuit Court of Pulaski County within thirty (30) days of the service of this Order upon the Respondent.

IT IS SO ORDERED THIS 23<sup>rd</sup> day of May 2022.

ARKANSAS VETERINARY MEDICAL  
EXAMINING BOARD

  
\_\_\_\_\_  
Cara Tharp, Director

**ELECTRONICALLY FILED**  
Pulaski County Circuit Court  
Terri Hollingsworth, Circuit/County Clerk  
2022-Jun-07 10:46:51  
60CV-22-3607  
C06D12 : 10 Pages

**IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS  
CIVIL DIVISION**

**ROBERT G. ZEPECKI, DVM  
VILLAGE ANIMAL GROUP, INC.**

**PETITIONERS**

**v. CASE NO. \_\_\_\_\_**

**ARKANSAS VETERINARY MEDICAL  
EXAMINING BOARD**

**RESPONDENT**

**PETITION FOR JUDICIAL REVIEW**

COMES NOW, the Petitioner, by and through his counsel, The Brad Hendricks Law Firm,  
and for his Petition for Judicial Review, now states:

1. This is a petition for judicial review of an administrative decision of the Arkansas  
Veterinary Medical Examining Board pursuant to the Arkansas Administrative Procedure Act. See  
Ark. Code Ann. §25-15-212.

2. Petitioner Robert G. Zepecki, DVM, is a licensed veterinarian.

3. Respondent Arkansas Veterinary Medical Examining Board (hereafter the  
"Board") is responsible for licensing veterinarians in Arkansas.

4. On or about May 23, 2022, the Board found as follows in attached Exhibit #1 the  
Findings of Fact, Conclusions of Law and Order. The Petitioner now seeks judicial review of this  
Order.

5. Jurisdiction and venue are proper in this Court pursuant to Ark. Code Ann. § 25-  
15-212(b)(1).



## FACTS

6. The Board based its conclusion to revoke the license for "misconduct" based on the findings in the attached order see also Exhibit #1, Findings of Fact, Conclusions of Law and Order.

7. These "facts" are not substantial evidence.

8. The standard for this Court's review of the Board decision is well established:

The standard of review in this area of the law is well-developed. The appellate court's review is directed not toward the circuit court, but toward the decision of the agency. That is so because administrative agencies are better equipped by specialization, insight through experience, and more flexible procedures than courts, to determine and analyze legal issues affecting their agencies. McQuay v. Arkansas State Bd. of Architects, 337 Ark. 339, 989 S.W.2d 499 (1999); Social Work Licensing Bd. v. Moncebaiz, 332 Ark. 67, 962 S.W.2d 797 (1998); Files v. Arkansas State Highway and Transp. Dep't, 325 Ark. 291, 925 S.W.2d 404 (1996). Our review of administrative decisions is limited in scope. Such decisions will be upheld if they are supported by substantial evidence and are not arbitrary, capricious, or characterized by an abuse of discretion. McQuay, supra; In re Sugarloaf Mining Co., 310 Ark. 772, 840 S.W.2d 172 (1992). Ark. Contrs. Licensing Bd. v. Pegasus Renovation Co., 347 Ark. 320, 326, 64 S.W.3d 241 2001.

## CLAIMS FOR RELIEF

9. The Petitioner realleges and incorporates by reference the allegations contained in the paragraphs hereinabove in this Petition.

10. The Board's decision should be reversed because the decision was not based on substantial evidence and was arbitrary and capricious.

11. The Petitioner respectfully requests the opportunity to further brief the issues in this case and requests that an immediate hearing be scheduled for oral arguments pursuant to Ark. Code Ann. § 25-15-212(g).

WHEREFORE, the Petitioner respectfully prays that this Court enter an Order reversing the decision of the Committee and for all other just and proper relief.

**Respectfully Submitted:**

**THE BRAD HENDRICKS LAW FIRM**  
500 C Pleasant Valley Drive  
Little Rock, AR 72227  
(501) 221-0444 (P)  
(501) 661-0196 (F)  
tkitchens@bradhendricks.com

**BY: /s/ Lloyd W. "Tré" Kitchens**  
**Lloyd W. "Tré" Kitchens, ABN 99075**

**ELECTRONICALLY FILED**  
Pulaski County Circuit Court  
Terri Hollingsworth, Circuit/County Clerk  
2022-Jul-07 10:38:16  
60CV-22-3607  
C06D12 : 4 Pages

**IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS  
CIVIL DIVISION**

**ROBERT G. ZEPECKI, DVM  
VILLAGE ANIMAL GROUP, INC.**

**PETITIONERS**

**v.**

**CASE NO. 60CV-22-3607**

**ARKANSAS VETERINARY MEDICAL EXAMINING BOARD**

**RESPONDENT**

---

**ANSWER TO PETITION FOR JUDICIAL REVIEW**

Comes now the Arkansas Veterinary Medical Examining Board (Board or AVMEB), by and through its attorneys Mark Wade Hodge and John Michael Bynum, and for its Answer to the Petition for Judicial Review, states as follows:

1. Paragraph 1 does not contain any material factual allegations that require a response. To the extent a response is required, Respondent denies the same.
2. Respondent admits the allegations contained in Paragraph 2 of the Petition.
3. Respondent admits the allegations contained in Paragraph 3 of the Petition.
4. Respondent admits the allegations contained in Paragraph 4 of the Petition.
5. Respondent admits the allegations contained in Paragraph 5 of the Petition.
6. Respondent denies the allegations in Paragraph 6 of the Petition, including the allegation that Respondent's license was revoked by the Board.
7. Respondent denies the allegations contained in Paragraph 7 of the Petition.



8. The statutory provisions and judicial opinions identified in Paragraph 8 of the Petition speak for themselves and do not require a response. To the extent a response is required, Respondent denies the same.

9. In response to Paragraph 9 of the Petition, Respondent incorporates by reference all of its responses set forth above.

10. Respondent denies the allegations and assertions in Paragraph 10 and denies that Respondent is entitled to any relief whatsoever.

11. Respondent denies that Petitioner is entitled to any of the relief requested in his Petition's prayer for relief.

12. The statutory provisions and judicial opinions identified in Paragraph 11 of the Petition speak for themselves and do not require a response. Paragraph 11 also contains assertions does not contain any material factual allegations that require a response. To the extent a response is required, Respondent denies the same.

13. Pleading affirmatively, Appellant should be limited by the scope and nature of his objections and arguments presented below, and this Court should not consider any issue raised on appeal that was not raised before the administrative agency. See *City of Benton v. Arkansas Soil and Water Conservation Com'n*, 345 Ark. 249, 259, 45 S.W.3d 805, 812 (2001).

14. The Department reserves the right to plead further and reserves objections on the basis of (1) lack of jurisdiction over the subject matter, (2) lack of jurisdiction over the person, (3) improper venue, (4) insufficiency of process, (5) insufficiency of service or process, (6) failure to state facts upon which relief can be granted, and (7) failure to join a party under Rule 19, if any.

15. The record of the administrative proceeding is filed herewith in accordance with Ark. Code Ann. § 25-15-212(d)(1).

WHEREFORE, the Respondent prays that the Department's Findings of Fact, Conclusions of Law and Order be affirmed; that the Petition for Judicial Review be denied and dismissed; for costs pursuant to Ark. Code Ann. § 25-15-212(d)(2); and for any and all other relief to which it may be entitled.

Respectfully submitted,

**ARKANSAS DEPARTMENT OF  
AGRICULTURE**

By: /s/John Michael Bynum  
John Michael Bynum  
Ark. Bar No. 2016054  
Arkansas Department of Agriculture  
1 Natural Resources Drive  
Little Rock, AR 72205  
501-225-1598  
[michael.bynum@agriculture.arkansas.gov](mailto:michael.bynum@agriculture.arkansas.gov)

Mark Wade Hodge  
Ark. Bar No. 90072  
Arkansas Department of Agriculture  
1 Natural Resources Drive  
Little Rock, AR 72205  
501-225-1598  
[wade.hodge@agriculture.arkansas.gov](mailto:wade.hodge@agriculture.arkansas.gov)

**CERTIFICATE OF SERVICE**

I, John Michael Bynum, do hereby certify that a copy of the foregoing pleading has been sent via electronic filing notification this the 7th day of July 2022, to:

Lloyd W. "Tre" Kitchens  
Ark. Bar No. 99075  
THE BRAD HENDRICKS LAW FIRM  
500 C Pleasant Valley Drive  
Little Rock, AR 72227  
(501) 221-0444 (P)  
(501) 661-0196 (F)  
tkitchens@bradhendricks.com

By: /s/John Michael Bynum  
John Michael Bynum  
Ark. Bar No. 2016054  
Arkansas Department of Agriculture  
1 Natural Resources Drive  
Little Rock, AR 72205  
501-225-1598  
michael.bynum@agriculture.arkansas.gov

**ELECTRONICALLY FILED**  
Pulaski County Circuit Court  
Terri Hollingsworth, Circuit/County Clerk  
2023-Jul-12 11:28:52  
60CV-22-3607  
C06D12 : 1 Page

**IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS  
TWELFTH DIVISION**

**ROBERT G. ZEPECKI, DVM**

**PETITIONERS**

**VS.**

**NO.60CV-22-3607**

**ARKANSAS VETERINARY MEDICAL  
EXAMINING BOARD**

**RESPONDENT**

**RULE 41 NOTICE**

There has been no action shown on the record in the above-styled case for the past twelve (12) months. You are hereby notified that the case will be dismissed pursuant to Rule 41 of the Arkansas Rules of Civil Procedure for want of prosecution unless, within two (2) weeks from the date of this notice, application is made upon a showing of good cause to continue this case on the Court's docket.

  
CIRCUIT JUDGE

**JUL 12 2022**

DATE

cc: **Lloyd W. "Tre" Kitchens**  
**Attorney at Law**  
*(via electronic filing)*

**John Michael Bynum**  
**Attorney at Law**  
*(via electronic filing)*



ELECTRONICALLY FILED  
Pulaski County Circuit Court  
Terri Hollingsworth, Circuit/County Clerk  
2023-Aug-07 11:31:19  
60CV-22-3607  
C06D12 : 1 Page

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS  
TWELFTH DIVISION

ROBERT G. ZEPECKI, DVM

PETITIONERS

VS.

NO.60CV-22-3607

ARKANSAS VETERINARY MEDICAL  
EXAMINING BOARD

RESPONDENT

ORDER OF DISMISSAL WITHOUT PREJUDICE

On this date, this cause is hereby dismissed without prejudice for lack of  
prosecution in accordance with Rule 41 of the Arkansas Rules of Civil Procedure.

IT IS SO ORDERED.

*Carla Conroy (RC)*

CIRCUIT JUDGE

AUG - 7 2023

DATE

Judge CONNORS  
Date 8-7-23 DW 12  
Jury Trial   
Bench Trial   
Non-Trial

EXHIBIT  
6



Sarah Huckabee Sanders  
Governor

# ARKANSAS DEPARTMENT OF AGRICULTURE

1 Natural Resources Drive, Little Rock, AR 72205  
agriculture.arkansas.gov  
(501) 225-1598



Wes Ward  
Secretary of Agriculture

February 12, 2024

Dr. Robert G. Zepecki  
4147 Hwy 7 N  
Hot Springs Village, AR 71909

Dr. Zepecki:

On August 7, 2023, your appeal for judicial review, Case No. 60CV-22-3607, was dismissed without prejudice per Rule 41(b) of the Arkansas Rules of Civil Procedure (Exhibit A). Per Ark. Code Ann. § 25-15-212(b), the Respondent to an adjudicative decision by a commission or board has thirty (30) days to file for judicial review. Because the statute of limitations for Judicial Review ran on September 6, 2023, the Findings of Fact and Conclusions of Law by the Arkansas Veterinary Medical Examining Board and the corresponding Order are the final adjudication on Docket No. 2019-20 and Docket No. 2020-04.

Since the statute of limitations for judicial review has run, the Arkansas Medical Examining Board's adjudication (Exhibit B) on the complaints against you still holds. As such, you are required to complete ten (10) hours of continuing education in record keeping for Charge 1, submit six (6) records of medical cases per month for twenty-four (24) months from June 2022 to June 2024 for Charge 2, pay a civil penalty in the amount of five thousand (\$5,000.00) dollars for Charge 3, and pay a civil penalty in the amount of five-thousand (\$5,000.00) dollars for Charge 4, for a total of \$10,000.00.

You may remit payment to:

Arkansas Department of Agriculture  
1 Natural Resources Dr.  
Little Rock, AR 72205.

Failure to remit payment in 30 days after you receive this letter will result in an action being filed per Ark. Code Ann. § 17-101-311(a)(2). Failure to comply with continuing education will result in further penalty or potential suspension or revocation of your Arkansas license to practice veterinary medicine.

Sincerely,

/s/Tanner Thomas  
Tanner Thomas  
Managing Attorney  
Arkansas Department of Agriculture  
[tanner.thomas@agriculture.arkansas.gov](mailto:tanner.thomas@agriculture.arkansas.gov)

Cc: Lloyd W. "Tre" Kitchens



CERTIFICATE OF SERVICE

I, Tanner Thomas, counsel for the Arkansas Department of Agriculture, certify by my signature that a copy of the proceeding letter has been sent by mail and email to:

Dr. Robert G. Zepecki  
4147 Hwy 7 N  
Hot Springs Village, AR 71909  
[robertzepecki@gmail.com](mailto:robertzepecki@gmail.com)

Lloyd W. "Tre" Kitchens  
The Brad Hendricks Law Firm, P.A.  
500C Pleasant Valley Dr.  
Little Rock, AR 72227  
[tkitchens@bradhendricks.com](mailto:tkitchens@bradhendricks.com)

/s/Tanner Thomas  
Tanner Thomas  
Managing Attorney  
Arkansas Department of Agriculture



Sarah Huckabee Sanders  
Governor

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agriculture.arkansas.gov  
(501) 225-1598



Wes Ward  
Secretary of Agriculture

February 12, 2024

Dr. Robert G. Zepecki  
4147 Hwy 7 N  
Hot Springs Village, AR 71909

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Sincerely,

/s/Tanner Thomas  
Tanner Thomas  
Managing Attorney  
Arkansas Department of Agriculture  
[tanner.thomas@agriculture.arkansas.gov](mailto:tanner.thomas@agriculture.arkansas.gov)

Cc: Lloyd W. "Tre" Kitchens

CERTIFICATE OF SERVICE

I, Tanner Thomas, counsel for the Arkansas Department of Agriculture, certify by my signature that a copy of the proceeding letter has been sent by mail and email to:

Dr. Robert G. Zepecki  
4147 Hwy 7 N  
Hot Springs Village, AR 71909  
[robertzepecki@gmail.com](mailto:robertzepecki@gmail.com)

Lloyd W. "Tre" Kitchens  
The Brad Hendricks Law Firm, P.A.  
500C Pleasant Valley Dr.  
Little Rock, AR 72227  
[tkitchens@bradhendricks.com](mailto:tkitchens@bradhendricks.com)

/s/Tanner Thomas  
Tanner Thomas  
Managing Attorney  
Arkansas Department of Agriculture

**Tanner Thomas**

---

**From:** Tanner Thomas  
**Sent:** Monday, February 12, 2024 3:23 PM  
**To:** tkitchens@bradhendricks.com  
**Cc:** Corey Seats  
**Subject:** Case No. 60CV-22-3607 - Zepecki  
**Attachments:** Ltr To RS - Dr Zepecki 02122024.pdf

Mr. Kitchens,

Please see the attached letter. The same letter has been sent to you and your client today via certified mail. Your client has 30 days from the date he receives the certified mail to respond.

Sincerely,

**Tanner Thomas**  
Managing Attorney  
Arkansas Department of Agriculture  
Legal Division  
1 Natural Resources Drive, Little Rock, AR 72205  
Desk: (501) 823-1736  
Cell: (501) 353-3542



**Kara Maack**

---

**From:** Tanner Thomas  
**Sent:** Monday, February 12, 2024 3:23 PM  
**To:** tkitchens@bradhendricks.com  
**Cc:** Corey Seats  
**Subject:** Case No. 60CV-22-3607 - Zepecki  
**Attachments:** Ltr To RS - Dr Zepecki 02122024.pdf

Mr. Klitchens,

Please see the attached letter. The same letter has been sent to you and your client today via certified mail. Your client has 30 days from the date he receives the certified mail to respond.

Sincerely,

**Tanner Thomas**  
Managing Attorney  
Arkansas Department of Agriculture  
Legal Division  
1 Natural Resources Drive, Little Rock, AR 72205  
Desk: (501) 823-1736  
Cell: (501) 353-3542





Sarah Huckabee Sanders  
Governor

## ARKANSAS DEPARTMENT OF AGRICULTURE

1 Natural Resources Drive, Little Rock, AR 72205  
agriculture.arkansas.gov  
(501) 225-1598



Wes Ward  
Secretary of Agriculture

February 12, 2024

Dr. Robert G. Zepecki  
4147 Hwy 7 N  
Hot Springs Village, AR 71909

Dr. Zepecki:

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Sincerely,

/s/Tanner Thomas  
Tanner Thomas  
Managing Attorney  
Arkansas Department of Agriculture  
[tanner.thomas@agriculture.arkansas.gov](mailto:tanner.thomas@agriculture.arkansas.gov)

Cc: Lloyd W. "Tre" Kitchens

**CERTIFICATE OF SERVICE**

I, Tanner Thomas, counsel for the Arkansas Department of Agriculture, certify by my signature that a copy of the preceding letter has been sent by mail and email to:

Dr. Robert G. Zepecki  
4147 Hwy 7 N  
Hot Springs Village, AR 71909  
[robertzepecki@gmail.com](mailto:robertzepecki@gmail.com)

Lloyd W. "Tre" Kitchens  
The Brad Hendricks Law Firm, P.A.  
500C Pleasant Valley Dr.  
Little Rock, AR 72227  
[tkitchens@bradhendricks.com](mailto:tkitchens@bradhendricks.com)

/s/Tanner Thomas  
Tanner Thomas  
Managing Attorney  
Arkansas Department of Agriculture

ALERT: SEVERE WEATHER CONDITIONS ACROSS THE U.S. MAY D

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**Tanner Thomas**

---

**From:** Tanner Thomas  
**Sent:** Tuesday, May 7, 2024 11:48 AM  
**To:** Audra Murray  
**Cc:** Tre Kitchens; Corey Seats; Kara Maack (AGRI)  
**Subject:** RE: Dr. Robert Zepecki  
**Attachments:** 2023-12 Ltr&CAtoRespondent 05-03-2024.pdf; 2023-13 Ltr&CAtoRespondent 05-03-2024.pdf; Docket No. 2022-04\_Ltr&CAtoRespondent 05-01-2024.pdf; Docket No. 2022-02\_Ltr&CAtoRespondent 05-01-2024.pdf; Ltr To RS - Dr Zepecki 02122024.pdf; Docket No. 2022-05\_Ltr&CAtoRespondent 05-01-2024.pdf; Email to RS atty 02122024.pdf

Mr. Kitchens:

Thank you for reaching out.

Please see the attached consent agreements the Arkansas Department of Agriculture has sent to your client prior to your letter of representation.

Also, please see the attached letter and email the Department sent to both you and your client on February 12, 2024, regarding further action on the Veterinary Medical Examining Board's (VMEB) May 2022 Opinion and Order (Order). The Arkansas Livestock and Poultry Commission (ALPC), which has assumed VMEB's prior responsibilities, has decided to hold a hearing on your client's noncompliance after this matter was dismissed by the Arkansas Court of Appeals in August 2023. See Ark. Code Ann. § 17-101-305(a)(18).

In addition to the noncompliance from that Order, the ALPC has decided to hold a hearing on the issue of "fraud, deceit, or misrepresentation..." in your client's renewal application, based on his failure to disclose the pending matters before the ALPC on his application for license renewal. See Ark. Code Ann. § 17-101-305(a)(1). A proper hearing notice will be sent to you when the ALPC sets a date and time.

Lastly, please copy our legal service specialist, [kara.m.maack@agriculture.arkansas.gov](mailto:kara.m.maack@agriculture.arkansas.gov) on all future correspondence on these matters.

Again, I thank you for reaching out, and I look forward to working with you.

Sincerely,

**TANNER THOMAS**  
MANAGING ATTORNEY

Arkansas Department of Agriculture  
1 Natural Resources Drive, Little Rock, AR 72205  
Desk: (501) 823-1736 | Cell: (501) 353-3542  
[tanner.thomas@agriculture.arkansas.gov](mailto:tanner.thomas@agriculture.arkansas.gov)





From: Audra Murray <amurray@bradhendricks.com>  
Sent: Monday, May 6, 2024 4:14 PM  
To: Tanner Thomas <tanner.thomas@agriculture.arkansas.gov>  
Cc: Tre Kitchens <tkitchens@bradhendricks.com>  
Subject: Dr. Robert Zepecki

You don't often get email from [amurray@bradhendricks.com](mailto:amurray@bradhendricks.com). [Learn why this is important](#)

Mr. Thomas –Attorney Tré Kitchen and The Brad Hendricks Law Firm represent Dr. Robert Zepecki in all matters. Please direct any and all future correspondence regarding Dr. Zepecki to this firm.

Thank you.  
Audra Murray



**THE BRAD HENDRICKS LAW FIRM**

500 C Pleasant Valley Drive, Little Rock, Arkansas 72227  
501-221-0444 | Fax: (501) 661-0196  
Toll Free: (800) 603-5100  
[amurray@bradhendricks.com](mailto:amurray@bradhendricks.com)  
[BradHendricks.com](http://BradHendricks.com)

**From:** [Audra Murray](#)  
**To:** [Tanner Thomas](#)  
**Cc:** [Tre Kitchens](#)  
**Subject:** Dr. Robert Zepecki  
**Date:** Thursday, May 16, 2024 2:10:09 PM  
**Attachments:** [image186536.png](#)  
[image415550.png](#)  
[24.05.16\\_ltr to Thomas.pdf](#)

---

Mr. Thomas – please see correspondence attached. Thank you.  
Audra Murray



**THE BRAD HENDRICKS LAW FIRM**

500 C Pleasant Valley Drive, Little Rock, Arkansas 72227  
501-221-0444 | Fax: (501) 661-0196  
Toll Free: (800) 603-5100  
[amurray@bradhendricks.com](mailto:amurray@bradhendricks.com)  
[BradHendricks.com](http://BradHendricks.com)



Sarah Huckabee Sanders  
Governor

# ARKANSAS DEPARTMENT OF AGRICULTURE

1 Natural Resources Drive, Little Rock, AR 72205  
agriculture.arkansas.gov  
(501) 225-1598



Wes Ward  
Secretary of Agriculture

May 28, 2024

Lloyd "Tré" Kitchens  
The Brad Hendricks Law Firm  
500 C. Pleasant Valley Drive  
Little Rock, AR 72227  
501-221-0444 | Fax: (501) 661-0196  
tkitchens@bradhendricks.com

Dear Mr. Kitchens:

The attached proposed document shall serve as the Arkansas Department of Agriculture's Livestock & Poultry Division extending an offer to pay Dr. Robert G. Zepecki's civil penalty as incurred from the Decision & Order of the Arkansas Veterinary Medical Examining Board in May of 2022 on Docket Nos. 2019-20 & 2020-04. This Installment Agreement shall only be considered satisfaction of one of the penalties applied in that Order.

Please review and provide a response within thirty (30) days from the receipt of this proposed Installment Agreement.

Sincerely,

Tanner Thomas  
Managing Attorney  
Arkansas Department of Agriculture



**From:** [Tanner Thomas](#)  
**To:** ["Audra Murray"](#)  
**Cc:** [Tre Kitchens](#); [Kara Maack \(AGRI\)](#)  
**Subject:** RE: Dr. Robert Zepecki  
**Date:** Tuesday, May 28, 2024 11:09:00 AM  
**Attachments:** [05282024 ITR to RS Counsel.pdf](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[Installation Agreement \(Unexecuted\) - Docket Nos. 2019-20 & 2020-04.pdf](#)

---

Mr. Kitchens,

Please see the attached proposed agreement. Should there be any comment or question, please let me know.

Sincerely

**TANNER THOMAS**  
MANAGING ATTORNEY

Arkansas Department of Agriculture  
1 Natural Resources Drive, Little Rock, AR 72205  
Desk: (501) 823-1736 | Cell: (501) 353-3542  
[tanner.thomas@agriculture.arkansas.gov](mailto:tanner.thomas@agriculture.arkansas.gov)



**From:** Audra Murray <[amurray@bradhendricks.com](mailto:amurray@bradhendricks.com)>  
**Sent:** Thursday, May 23, 2024 10:45 AM  
**To:** Tanner Thomas <[tanner.thomas@agriculture.arkansas.gov](mailto:tanner.thomas@agriculture.arkansas.gov)>  
**Cc:** Tre Kitchens <[tkitchens@bradhendricks.com](mailto:tkitchens@bradhendricks.com)>  
**Subject:** RE: Dr. Robert Zepecki

Thank you. We appreciate it.

Audra Murray



**THE BRAD HENDRICKS LAW FIRM**

500 C Pleasant Valley Drive, Little Rock, Arkansas 72227  
501-221-0444 | Fax: (501) 661-0196  
Toll Free: (800) 603-5100  
[amurray@bradhendricks.com](mailto:amurray@bradhendricks.com)  
[BradHendricks.com](http://BradHendricks.com)

**From:** Tanner Thomas <[tanner.thomas@agriculture.arkansas.gov](mailto:tanner.thomas@agriculture.arkansas.gov)>  
**Sent:** Thursday, May 23, 2024 10:40 AM  
**To:** Audra Murray <[amurray@bradhendricks.com](mailto:amurray@bradhendricks.com)>

Cc: Tre Kitchens <[tkitchens@bradhendricks.com](mailto:tkitchens@bradhendricks.com)>  
Subject: RE: Dr. Robert Zepecki

Ms. Murray,

Forgot to let you all know that I received this letter. I will see what we can work out with Livestock and Poultry Division and get back to you.

Sincerely,  
**TANNER THOMAS**  
MANAGING ATTORNEY

Arkansas Department of Agriculture  
1 Natural Resources Drive, Little Rock, AR 72205  
Desk: (501) 823-1736 | Cell: (501) 353-3542  
[tanner.thomas@agriculture.arkansas.gov](mailto:tanner.thomas@agriculture.arkansas.gov)



From: Audra Murray <[amurray@bradhendricks.com](mailto:amurray@bradhendricks.com)>  
Sent: Thursday, May 16, 2024 2:10 PM  
To: Tanner Thomas <[tanner.thomas@agriculture.arkansas.gov](mailto:tanner.thomas@agriculture.arkansas.gov)>  
Cc: Tre Kitchens <[tkitchens@bradhendricks.com](mailto:tkitchens@bradhendricks.com)>  
Subject: Dr. Robert Zepecki

Mr. Thomas – please see correspondence attached. Thank you.  
Audra Murray



**THE BRAD HENDRICKS LAW FIRM**

500 C Pleasant Valley Drive, Little Rock, Arkansas 72227  
[501-221-0444](tel:501-221-0444) | Fax: [501-661-0196](tel:501-661-0196)  
Toll Free: (800) 603-5100  
[amurray@bradhendricks.com](mailto:amurray@bradhendricks.com)  
[BradHendricks.com](http://BradHendricks.com)

**BEFORE THE ARKANSAS LIVESTOCK & POULTRY COMMISSION**

**IN THE MATTER OF  
ROBERT G. ZEPECKI, DVM  
VILLAGE ANIMAL GROUP, INC.**

**DOCKET NO. 2019-20  
DOCKET NO. 2020-04**

**INSTALLMENT AGREEMENT**

WHEREAS, Robert G. Zepecki, DVM (Respondent) is under disciplinary action by the Arkansas Veterinary Medical Examining Board (Board) by a decision made by the Board in its opinion issued on Docket Nos. 2019-20 and 2020-04, wherein the Board assigned four (4) penalties, two (2) of which are \$5,000 each; and

WHEREAS, the Arkansas Livestock and Poultry Commission (Commission) now has the responsibility of enforcing disciplinary actions of the Board under Ark. Code Ann. § 17-101-101 *et seq.*; and

WHEREAS, Respondent desires to avoid a formal hearing on the noncompliance of paying the 2 \$5,000 civil penalties, and in the interest of a partial settlement of Docket Nos. 2019-20 and 2020-04, Respondent willfully agrees and consents to comply with the provisions set forth below in agreement with the Arkansas Department of Agriculture (Department):

**AGREEMENT**

1. This Installment Agreement shall become effective when both parties have executed, meaning, upon the date wherein Respondent has sent his executed copy to the Department and the Executive Director of the Department's Livestock & Poultry Division executes this Agreement with his signature. The date of the Executive Director's signature shall serve as the effective date;
2. Further, the Department shall notify Respondent's counsel, as soon as practicable, that the Agreement has been executed. The Department shall also provide a copy of the executed Agreement via email and certified mail as soon as practicable;

3. Respondent shall remit two (2) payments of \$5,000.00 to the Department;
4. Respondent shall remit the first payment on or before the 30<sup>th</sup> day after the effective date of this Agreement;
5. Respondent shall remit the second payment to the Department on or before the 60<sup>th</sup> day after the effective date of this Agreement;
6. Respondent may pay the entire amount (\$10,000.00) at any point within the 60 days after entering into the Agreement with the Department;
7. Should Respondent not remit full payment under the terms of this Agreement within 60 days of the full and final execution of this Agreement, this Agreement, along with other relevant evidence, shall be presented to the Arkansas Livestock & Poultry Commission (Commission) for further disciplinary action;
8. Each payment shall be made to:  

Arkansas Department of Agriculture, FBO: Veterinary Scholarship Fund
9. Each payment shall be made via check and sent to:

1 Natural Resources Dr.  
ATTN: Candice Schnebelen  
Little Rock, AR 72205

The Respondent and the Department hereby enter into this Agreement by their signatures

below:

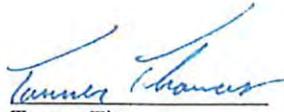
Robert G. Zepecki, DVM  
Date:

Director  
Arkansas Department of Agriculture's Livestock & Poultry Division  
Date:

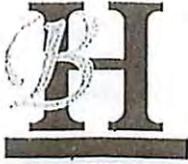
CERTIFICATE OF SERVICE

I, Tanner Thomas, certify by my signature that on the 28<sup>th</sup> of May I have served the foregoing document via email to Respondent's counsel,

Lloyd W. "Tré" Kitchens  
The Brad Hendricks Law Firm  
500 C. Pleasant Valley Drive  
Little Rock, AR 72227  
501-221-0444 | Fax: (501) 661-0196  
[lkitchens@bradhendricks.com](mailto:lkitchens@bradhendricks.com)



Tanner Thomas  
Managing Attorney  
Arkansas Department of Agriculture



THE BRAD HENDRICKS  
LAW FIRM

500 C Pleasant Valley Drive  
Little Rock, Arkansas 72227

Tel: (501) 221-0444  
Fax: (501) 661-0196  
www.BradHendricks.com

Brad Hendricks ††  
Lamar Porter †  
George R. Wise Jr.  
Matthew E. Hurtness †  
Caroline C. Lewis

All Licensed in Arkansas  
† Also Licensed in Texas  
†† Also Licensed in Texas & Missouri

Lloyd W. "Tre" Kitchens  
Edward T. Oglesby †  
Joseph Molinaro  
Lea Phelps  
David P. Rawls \*  
Gary Davis \*

† Also Licensed in Louisiana  
\* Of Counsel

June 3, 2024

Tanner Thomas, Esq.  
Ark. Dept. of Agriculture  
1 Natural Resources Dr.  
Little Rock, AR 72205

RE: In the Matter of Robert G. Zepecki, DVM  
Village Animal Group, Inc.  
Docket No. 2019-20  
Docket No. 2020-04

Dear Mr. Tanner:

Enclosed please find Dr. Zepecki's executed Installment Agreement in the above matter along with a check in the amount of \$5,000.00 for payment of the first installment.

Sincerely,

Audra L. Murray, Paralegal  
amurray@bradhendricks.com

/alm  
Enclosures



**IN THE MATTER OF  
ROBERT G. ZEPECKI, DVM  
VILLAGE ANIMAL GROUP, INC.**

**DOCKET NO. 2019-20  
DOCKET NO. 2020-04**

**INSTALLMENT AGREEMENT**

WHEREAS, Robert G. Zepecki, DVM (Respondent) is under disciplinary action by the Arkansas Veterinary Medical Examining Board (Board) by a decision made by the Board in its opinion issued on Docket Nos. 2019-20 and 2020-04, wherein the Board assigned four (4) penalties, two (2) of which are \$5,000 each; and

WHEREAS, the Arkansas Livestock and Poultry Commission (Commission) now has the responsibility of enforcing disciplinary actions of the Board under Ark. Code Ann. § 17-101-101 *et seq.*; and

WHEREAS, Respondent desires to avoid a formal hearing on the noncompliance of paying the 2 \$5,000 civil penalties, and in the interest of a partial settlement of Docket Nos. 2019-20 and 2020-04, Respondent willfully agrees and consents to comply with the provisions set forth below in agreement with the Arkansas Department of Agriculture (Department):

**AGREEMENT**

1. This Installment Agreement shall become effective when both parties have executed, meaning, upon the date wherein Respondent has sent his executed copy to the Department and the Executive Director of the Department's Livestock & Poultry Division executes this Agreement with his signature. The date of the Executive Director's signature shall serve as the effective date;
2. Further, the Department shall notify Respondent's counsel, as soon as practicable, that the Agreement has been executed. The Department shall also provide a copy of the executed Agreement via email and certified mail as soon as practicable;

3. Respondent shall remit two (2) payments of \$5,000.00 to the Department;
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5. Respondent shall remit the second payment to the Department on or before the 60<sup>th</sup> day after the effective date of this Agreement;
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7. Should Respondent not remit full payment under the terms of this Agreement within 60 days of the full and final execution of this Agreement, this Agreement, along with other relevant evidence, shall be presented to the Arkansas Livestock & Poultry Commission (Commission) for further disciplinary action;
8. Each payment shall be made to:  

Arkansas Department of Agriculture, FBO: Veterinary Scholarship Fund
9. Each payment shall be made via check and sent to:  

1 Natural Resources Dr.  
ATTN: Candice Schnebelen  
Little Rock, AR 72205

The Respondent and the Department hereby enter into this Agreement by their signatures

below:



Robert G. Zepecki, DVM

Date: 06/03/2024



Director

Arkansas Department of Agriculture's Livestock & Poultry Division

Date: 06/26/2024

CERTIFICATE OF SERVICE

I, Tanner Thomas, certify by my signature that on the 28<sup>th</sup> of May I have served the foregoing document via email to Respondent's counsel,

Lloyd W. "Tré" Kitchens  
The Brad Hendricks Law Firm  
500 C. Pleasant Valley Drive  
Little Rock, AR 72227  
501-221-0444 | Fax: (501) 661-0196  
[lkitchens@bradhendricks.com](mailto:lkitchens@bradhendricks.com)



Tanner Thomas  
Managing Attorney  
Arkansas Department of Agriculture

THIS DOCUMENT HAS A COLORED BELL-CURVED AND HIGH-RESOLUTION BORDER. THE REVERSE SIDE OF THIS DOCUMENT HAS AN OPTICAL WATERMARK.



Village Pet Services, Inc.  
4147 North Highway 7  
Hot Springs Village, AR 71909  
(501) 625-3418

Chambers Bank  
901 Main Street  
Danville, AR 72833  
(479) 495-2236

2188

PAY TO  
THE ORDER  
OF

Arkansas Veterinary Medical Board

Date  
\$

06/03/2024

\*\*5,000.00

FIVE-THOUSAND AND 00/100\*\*\*\*\*

DOLLARS

Arkansas Veterinary Medical Board  
P.O. Box 8505  
Little Rock, Ar.

Installment Agreement Payment 1



From: [Audra Murray](#)  
To: [Tanner Thomas](#)  
Cc: [Tre Kitchens](#); [Kara Maack \(AGRI\)](#)  
Subject: RE: Dr. Robert Zepecki  
Date: Friday, June 7, 2024 9:04:57 AM  
Attachments: [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image358842.png](#)  
[image351560.png](#)

Dr. Zepecki's office will send out a new check today. You can shred the original check rather than send it back, per his office manager.

Audra Murray



**THE BRAD HENDRICKS LAW FIRM**

500 C Pleasant Valley Drive, Little Rock, Arkansas 72227  
501-221-0444 | Fax: (501) 661-0196  
Toll Free: (800) 603-5100  
amurray@bradhendricks.com  
BradHendricks.com

From: Tanner Thomas <Tanner.Thomas@agriculture.arkansas.gov>  
Sent: Friday, June 7, 2024 8:23 AM  
To: Audra Murray <amurray@bradhendricks.com>  
Cc: Tre Kitchens <tkitchens@bradhendricks.com>; Kara Maack (AGRI) <kara.m.maack@agriculture.arkansas.gov>  
Subject: RE: Dr. Robert Zepecki

Mr. Kitchens,

Thank you for having your client send in the signed installment agreement. However, the check sent by your client was made out to the Veterinary Board and not "Arkansas Department of Agriculture, FBO: Veterinary Scholarship Fund" per the instructions of the installment agreement.

We will send this check back to your client (directly to his address if that is fine with you). Please have him reissue a check made out the above-mentioned name.

Thanks,  
**TANNER THOMAS**  
MANAGING ATTORNEY

Arkansas Department of Agriculture  
1 Natural Resources Drive, Little Rock, AR 72205  
Desk: (501) 823-1736 | Cell: (501) 353-3542  
[tanner.thomas@agriculture.arkansas.gov](mailto:tanner.thomas@agriculture.arkansas.gov)





**From:** Tanner Thomas  
**Sent:** Tuesday, May 28, 2024 11:10 AM  
**To:** 'Audra Murray' <[amurray@bradhendricks.com](mailto:amurray@bradhendricks.com)>  
**Cc:** Tre Kitchens <[tkitchens@bradhendricks.com](mailto:tkitchens@bradhendricks.com)>; Kara Maack (AGRI) <[kara.m.maack@agriculture.arkansas.gov](mailto:kara.m.maack@agriculture.arkansas.gov)>  
**Subject:** RE: Dr. Robert Zepecki

Mr. Kitchens,

Please see the attached proposed agreement. Should there be any comment or question, please let me know.

Sincerely

**TANNER THOMAS**  
MANAGING ATTORNEY

Arkansas Department of Agriculture  
1 Natural Resources Drive, Little Rock, AR 72205  
Desk: (501) 823-1736 | Cell: (501) 353-3542  
[tanner.thomas@agriculture.arkansas.gov](mailto:tanner.thomas@agriculture.arkansas.gov)



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**Sent:** Thursday, May 23, 2024 10:45 AM  
**To:** Tanner Thomas <[tanner.thomas@agriculture.arkansas.gov](mailto:tanner.thomas@agriculture.arkansas.gov)>  
**Cc:** Tre Kitchens <[tkitchens@bradhendricks.com](mailto:tkitchens@bradhendricks.com)>  
**Subject:** RE: Dr. Robert Zepecki

Thank you. We appreciate it.

Audra Murray

**THE BRAD HENDRICKS LAW FIRM**  
500 C Pleasant Valley Drive, Little Rock, Arkansas 72227



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Toll Free: (800) 603-5100  
[amurray@bradhendricks.com](mailto:amurray@bradhendricks.com)  
[bradhendricks.com](http://bradhendricks.com)

**From:** Tanner Thomas <[tanner.thomas@agriculture.arkansas.gov](mailto:tanner.thomas@agriculture.arkansas.gov)>  
**Sent:** Thursday, May 23, 2024 10:40 AM  
**To:** Audra Murray <[amurray@bradhendricks.com](mailto:amurray@bradhendricks.com)>  
**Cc:** Tre Kitchens <[tkitchens@bradhendricks.com](mailto:tkitchens@bradhendricks.com)>  
**Subject:** RE: Dr. Robert Zepecki

Ms. Murray,

Forgot to let you all know that I received this letter. I will see what we can work out with Livestock and Poultry Division and get back to you.

Sincerely,  
**TANNER THOMAS**  
MANAGING ATTORNEY

Arkansas Department of Agriculture  
1 Natural Resources Drive, Little Rock, AR 72205  
Desk: (501) 823-1736 | Cell: (501) 353-3542  
[tanner.thomas@agriculture.arkansas.gov](mailto:tanner.thomas@agriculture.arkansas.gov)



**From:** Audra Murray <[amurray@bradhendricks.com](mailto:amurray@bradhendricks.com)>  
**Sent:** Thursday, May 16, 2024 2:10 PM  
**To:** Tanner Thomas <[tanner.thomas@agriculture.arkansas.gov](mailto:tanner.thomas@agriculture.arkansas.gov)>  
**Cc:** Tre Kitchens <[tkitchens@bradhendricks.com](mailto:tkitchens@bradhendricks.com)>  
**Subject:** Dr. Robert Zepecki

Mr. Thomas – please see correspondence attached. Thank you.  
Audra Murray



**THE BRAD HENDRICKS LAW FIRM**  
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501-221-0444 | Fax: (501) 661-0196  
Toll Free: (800) 603-5100  
[amurray@bradhendricks.com](mailto:amurray@bradhendricks.com)  
[bradhendricks.com](http://bradhendricks.com)

From: [Audra Murray](#)  
To: [Kara Maack \(AGRI\)](#)  
Cc: [Tre Kitchens](#); [Tanner Thomas](#)  
Subject: RE: Dr. Robert Zepecki  
Date: Monday, June 24, 2024 3:58:42 PM  
Attachments: [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image393132.png](#)  
[image735943.png](#)

Thanks, I will follow up.

Audra Murray



**THE BRAD HENDRICKS LAW FIRM**

500 C Pleasant Valley Drive, Little Rock, Arkansas 72227  
501-221-0444 | Fax: (501) 661-0196  
Toll Free: (800) 603-5100  
[amurray@bradhendricks.com](mailto:amurray@bradhendricks.com)  
[bradhendricks.com](http://bradhendricks.com)

From: Kara Maack (AGRI) <[kara.m.maack@agriculture.arkansas.gov](mailto:kara.m.maack@agriculture.arkansas.gov)>  
Sent: Monday, June 24, 2024 3:57 PM  
To: Audra Murray <[amurray@bradhendricks.com](mailto:amurray@bradhendricks.com)>  
Cc: Tre Kitchens <[kitchens@bradhendricks.com](mailto:kitchens@bradhendricks.com)>; Tanner Thomas <[tanner.thomas@agriculture.arkansas.gov](mailto:tanner.thomas@agriculture.arkansas.gov)>  
Subject: RE: Dr. Robert Zepecki

Audra,

Just wanted to let you know that we have not received the new check from Dr. Zepecki's office.

Thanks.

**KARA MAACK**  
**LEGAL SERVICES SPECIALIST**

Arkansas Department of Agriculture  
1 Natural Resources Drive, Little Rock, AR 72205  
(501) 219-6306  
[kara.m.maack@agriculture.arkansas.gov](mailto:kara.m.maack@agriculture.arkansas.gov)  
[agriculture.arkansas.gov](http://agriculture.arkansas.gov)



**From:** Audra Murray <[amurray@bradhendricks.com](mailto:amurray@bradhendricks.com)>  
**Sent:** Friday, June 7, 2024 9:04 AM  
**To:** Tanner Thomas <[Tanner.Thomas@agriculture.arkansas.gov](mailto:Tanner.Thomas@agriculture.arkansas.gov)>  
**Cc:** Tre Kitchens <[tkitchens@bradhendricks.com](mailto:tkitchens@bradhendricks.com)>; Kara Maack (AGRI) <[kara.m.maack@agriculture.arkansas.gov](mailto:kara.m.maack@agriculture.arkansas.gov)>  
**Subject:** RE: Dr. Robert Zepecki

Dr. Zepecki's office will send out a new check today. You can shred the original check rather than send it back, per his office manager.

Audra Murray



**THE BRAD HENDRICKS LAW FIRM**

500 C Pleasant Valley Drive, Little Rock, Arkansas 72227  
501-221-0144 | Fax: (501) 661-0196  
Toll Free: (800) 603-5100  
[amurray@bradhendricks.com](mailto:amurray@bradhendricks.com)  
[BradHendricks.com](http://BradHendricks.com)

**From:** Tanner Thomas <[Tanner.Thomas@agriculture.arkansas.gov](mailto:Tanner.Thomas@agriculture.arkansas.gov)>  
**Sent:** Friday, June 7, 2024 8:23 AM  
**To:** Audra Murray <[amurray@bradhendricks.com](mailto:amurray@bradhendricks.com)>  
**Cc:** Tre Kitchens <[tkitchens@bradhendricks.com](mailto:tkitchens@bradhendricks.com)>; Kara Maack (AGRI) <[kara.m.maack@agriculture.arkansas.gov](mailto:kara.m.maack@agriculture.arkansas.gov)>  
**Subject:** RE: Dr. Robert Zepecki

Mr. Kitchens,

Thank you for having your client send in the signed installment agreement. However, the check sent by your client was made out to the Veterinary Board and not "Arkansas Department of Agriculture, FBO: Veterinary Scholarship Fund" per the instructions of the installment agreement.

We will send this check back to your client (directly to his address if that is fine with you). Please have him reissue a check made out the above-mentioned name.

Thanks,  
**TANNER THOMAS**  
MANAGING ATTORNEY

Arkansas Department of Agriculture  
1 Natural Resources Drive, Little Rock, AR 72205  
Desk: (501) 823-1736 | Cell: (501) 353-3542  
[tanner.thomas@agriculture.arkansas.gov](mailto:tanner.thomas@agriculture.arkansas.gov)



**From:** Tanner Thomas  
**Sent:** Tuesday, May 28, 2024 11:10 AM  
**To:** 'Audra Murray' <[amurray@bradhendricks.com](mailto:amurray@bradhendricks.com)>  
**Cc:** Tre Kitchens <[tkitchens@bradhendricks.com](mailto:tkitchens@bradhendricks.com)>; Kara Maack (AGRI) <[kara.m.maack@agriculture.arkansas.gov](mailto:kara.m.maack@agriculture.arkansas.gov)>  
**Subject:** RE: Dr. Robert Zepecki

Mr. Kitchens,

Please see the attached proposed agreement. Should there be any comment or question, please let me know.

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**Subject:** RE: Dr. Robert Zepecki

Thank you. We appreciate it.

Audra Murray

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**From:** [Audra Murray](#)  
**To:** [Kara Maack \(AGRI\)](#)  
**Cc:** [Tre Kitchens](#); [Tanner Thomas](#)  
**Subject:** RE: Dr. Robert Zepecki  
**Date:** Monday, June 24, 2024 4:12:09 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image401814.png](#)  
[image106239.png](#)

Kara – I'm told it was mailed. Dr. Zepecki's office will send out another check to our office this time and we will forward to you to make sure it gets there.

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Subject: RE: Dr. Robert Zepecki

Dr. Zepecki's office will send out a new check today. You can shred the original check rather than send it back, per his office manager.

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AUG 09 2024

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LAW FIRM**

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Little Rock, Arkansas 72227

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www.BradHendricks.com

Brad Hendricks ††  
Lamar Porter †  
George R. Wise Jr.  
Matthew E. Hartness †  
Caroline C. Lewis

All Licensed in Arkansas  
† Also Licensed in Texas  
†† Also Licensed in Texas & Missouri

Lloyd W. "Tre" Kitchens  
Edward T. Oglesby ‡  
Joseph Molinaro  
Lea Phelps  
David P. Rawls \*  
Gary Davis \*

‡ Also Licensed in Louisiana  
\* Of Counsel

August 7, 2024

Candice Schnebelen  
1 Natural Resources Dr.  
Little Rock, AR 72205

RE: In the Matter of Robert G. Zepecki, DVM  
Village Animal Group, Inc.  
Docket No. 2019-20  
Docket No. 2020-04

Dear Ms. Schnebelen:

Enclosed please find Dr. Zepecki's second installment of \$5,000.00 pursuant to the installment agreement.

Sincerely,

*Audra L. Murray*

Audra L. Murray, Paralegal  
amurray@bradhendricks.com

/alm  
Enclosure

**RECEIVED**  
AUG 13 2024  
By: *Legal*

8/12/2024 9:08:44 AM  
NUMBER: 2024  
REMITTER/VET  
TOTAL \$5,000.00  
CHECK \$5,000.00  
ITEM COUNT: 1  
TRFID: 001728  
DASHEN 222  
31-050017009-001001

**EXHIBIT**  
**14**

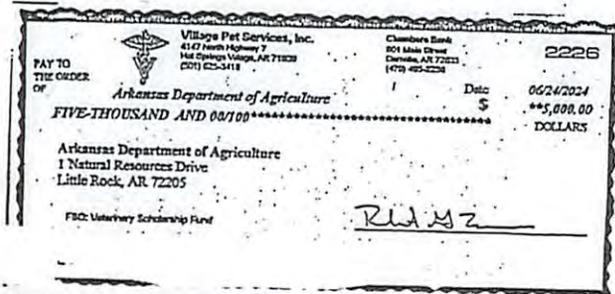
### Deposit Details by Deposit Number - Treasurer State Of Arkansas

Account Name/Number: Treasurer State Of Arkansas/000073828756

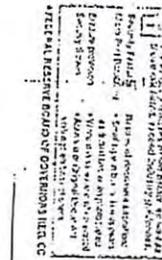
Number of Deposits: 1  
Total of Deposits Submitted: 5,000.00  
Total Number of Items: 1

Account Currency: USD

(continued)



Front Item Number 0000001



Back

Seq: 1  
Dep: 034226  
Date: 08/12/24

E-Check Only to  
 Treasurer of Arkansas  
 Treasurer of Arkansas  
 Arkansas Department of Agriculture  
 Deposited by: Tra'Vonda Tate  
 08/12/24 11:01 AM  
 0000001  
 0000001

From: [Kara Maack \(AGRI\)](#)  
To: [Audra Murray](#)  
Cc: [Tre Kitchens](#); [Tanner Thomas](#)  
Subject: RE: Dr. Robert Zepecki | Docket Nos. 2019-20 ad 2020-04  
Date: Thursday, August 22, 2024 3:13:58 PM  
Attachments: [image002.png](#)  
[image003.png](#)  
[image004.png](#)

---

Ms. Murray,

I wanted to confirm receipt of the first installment payment, check number 2226 in the amount of \$5,000. I noted your cover letter included with that payment stated it was Dr. Zepecki's "second installment", however, per your email of June 7, 2024, you instructed us to shred the previously received check. Please note that Dr. Zepecki's second installment payment in the amount of \$5,000, is expected on or before August 25, 2024.

Please feel free to contact me should you have any questions.

**KARA MAACK**  
**LEGAL SERVICES SPECIALIST**

Arkansas Department of Agriculture  
1 Natural Resources Drive, Little Rock, AR 72205  
(501) 219-6306  
[kara.m.maack@agriculture.arkansas.gov](mailto:kara.m.maack@agriculture.arkansas.gov)  
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From: Audra Murray <amurray@bradhendricks.com>  
Sent: Wednesday, August 7, 2024 1:19 PM  
To: Tanner Thomas <tanner.thomas@agriculture.arkansas.gov>; Kara Maack (AGRI) <kara.m.maack@agriculture.arkansas.gov>  
Cc: Tre Kitchens <tkitchens@bradhendricks.com>  
Subject: RE: Dr. Robert Zepecki

Mr. Thomas – we just received the \$5000 installment from Dr. Zepecki in today's mail. I will get that out in today's mail.

Audra Murray





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From: Tanner Thomas <[tanner.thomas@agriculture.arkansas.gov](mailto:tanner.thomas@agriculture.arkansas.gov)>  
Sent: Thursday, July 18, 2024 11:30 AM  
To: Audra Murray <[amurray@bradhendricks.com](mailto:amurray@bradhendricks.com)>; Kara Maack (AGRI) <[kara.m.maack@agriculture.arkansas.gov](mailto:kara.m.maack@agriculture.arkansas.gov)>  
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Audra,

We have not yet received the corrected check. The 30-day deadline is soon approaching. Please remind your client to remit payment.

Thank you,  
**TANNER THOMAS**  
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To: Tanner Thomas <[tanner.thomas@agriculture.arkansas.gov](mailto:tanner.thomas@agriculture.arkansas.gov)>  
Cc: Tre Kitchens <[tkitchens@bradhendricks.com](mailto:tkitchens@bradhendricks.com)>  
Subject: Dr. Robert Zepecki

Mr. Thomas – please see correspondence attached. Thank you.  
Audra Murray



**THE BRAD HENDRICKS LAW FIRM**

500 C Pleasant Valley Drive, Little Rock, Arkansas 72227  
[501-221-0444](tel:501-221-0444) | Fax: [501-661-0196](tel:501-661-0196)  
Toll Free: (800) 603-5100  
[amurray@bradhendricks.com](mailto:amurray@bradhendricks.com)  
[Bradhendricks.com](http://Bradhendricks.com)



Date	Category	Course
07/2022	HR	ATMA Convention 2022

Title: DR  
 First Name: ROBERT  
 Middle Name: G.  
 Last Name: ZEFCKI  
 Suffix: DVM  
 Update Status:

105 PPH



CONTINUING EDUCATION  
APRIL 1<sup>st</sup> - MARCH 31<sup>st</sup>

Before any license is renewed on an ACTIVE basis, the licensee shall certify that he or she has obtained twenty (20) hours of continuing education. List conference/meeting/program, location, date, and actual hours of attendance (i.e. ArVMA Winter Meeting, Hot Springs, AR (date) 20 hours).

1. Education pertaining to veterinary medicine and surgery (Minimum 10 hours required):

- A. Memphis / Shelby County Veterinary Medical Assoc. (Hours) 2.0
- B. Vet Show Chicago (Hours) 1
- C. Vet Show Chicago (Hours) 1
- D. \_\_\_\_\_ (Hours) \_\_\_\_\_

CREDIT HOURS GAINED BY THIS MEANS .....

2. Education pertaining to non-scientific topics (Maximum 8 hours allowed):

- A. \_\_\_\_\_ (Hours) \_\_\_\_\_
- B. \_\_\_\_\_ (Hours) \_\_\_\_\_
- C. \_\_\_\_\_ (Hours) \_\_\_\_\_
- D. \_\_\_\_\_ (Hours) \_\_\_\_\_

CREDIT HOURS GAINED BY THIS MEANS .....

3. Visitation with a colleague not associated with your practice at the facility of that colleague (Maximum 2 hours allowed):

- A. \_\_\_\_\_ (Hours) \_\_\_\_\_
- B. \_\_\_\_\_ (Hours) \_\_\_\_\_

CREDIT HOURS GAINED BY THIS MEANS .....

4. Education obtained by attending the exhibit hall at a state or national meeting (Maximum 2 hours allowed):

- A. \_\_\_\_\_ (Hours) \_\_\_\_\_
- B. \_\_\_\_\_ (Hours) \_\_\_\_\_

CREDIT HOURS GAINED BY THIS MEANS .....

TOTAL HOURS (MUST EQUAL OR EXCEED 20 HOURS) .....

Of the hours listed above, how many hours were taken in-person OR through a live online format, and how many hours were taken through a pre-recorded online format?

- 1. In-Person/Live Online (Minimum 10 hours required): 22
- 2. Pre-Recorded Online (Maximum 10 hours allowed): \_\_\_\_\_

TOTAL HOURS MUST EQUAL HOURS LISTED IN TOP SECTION .....

Return this application with required fee to:

Arkansas Department of Agriculture  
Veterinary Medical Examining Board  
1 Natural Resources Drive  
Little Rock, AR 72205



This program ED-1102840, has been approved for 1.00 hour of continuing education credit to any veterinarian and/or veterinary technician in jurisdictions that recognize RACE approval.

**Provider: 50-25147**  
**RACE Category: Medical Program**  
**Method of Delivery: Seminar/Lecture & Interactive-Distance**  
**Course Type: Live Course**

**Closer(S) Media . 255 W 37 ST, Floor 12 . New York, NY 10018**



Memphis/Shelby County  
Veterinary Medical Association

Memphis/Shelby County Veterinary Medical Association  
23rd Annual Mid-South Regional Conference, Olive Branch, MS  
November 16, 2023

Thursday, November 16, 2023

4:00 - 6:00 p.m.

Ralph C. Harvey, DVM, MS, Diplomate  
Osteoarthritis (OA) in Dogs & Cats  
Anesthesia & Pain Management

*RCH* 2 Hours

7:00 to 9:00 p.m.

Terry Lynn Stevens, Pharm.D.  
DEA Requirements  
Documentation for DVM's

*TLS* 2 Hours

Dr. / LVMT *R. D. [Signature]* has successfully completed

*4* Hours of Continuing Education

Leo M. Hughes, MSCVMA Executive Director

Approved by Tennessee Board of Veterinary Medical Examiners

# VET SHOW

## CE Certificate of Attendance

This is to certify that: Robert

License #:

State:

Has completed the following continuing education live webinar

**Practical Small Animal Ultrasound:**

**4 Cases Where POCUS Enhanced Gastrointestinal Disease Management**

Date: September 28, 2023

CE hours: 1.00

Signature: .....

Authorized Signature:



April Walsh  
Vice President  
Closer Still Vet US





Memphis/Shelby County  
Veterinary Medical Association

Memphis/Shelby County Veterinary Medical Association  
23<sup>rd</sup> Annual Mid-South Regional Conference, Olive Branch, MS  
November 18, 2023

Saturday, November 18, 2023

8:00 am – Noon

Joseph Bargas, DVM, PhD, DACVIM, DACVN

Rusty Pipes: Chronic Kidney Disease

Leaky Pipes: Micturition Disorder: Stinky Pipes: UTIs

R. B. 4 Hours

1:00 pm – 5:00 pm

Jonathan Abbott, DVM, DACVIM

Canine Pulmonary Hypertension

Management of Canine Mitral Valve Disease

Managing Cardiac Cases – When Echo Isn't Available

Feline Cardiomyopathy

J. A. 4 Hours

Dr./LVMT

Row Zeyen

has successfully completed

8 Hours of Continuing Education

Leo M. Hughes, MSCVMA Executive Director

Approved by Tennessee Board of Veterinary Medical Examiners



Memphis/Shelby County  
Veterinary Medical Association

Memphis/Shelby County Veterinary Medical Association  
29<sup>th</sup> Annual Mid-South Regional Conference, Olive Branch, MS  
November 17, 2023

Friday, November 17, 2023

8:00 am - Noon

Louise Dunn, CEO/Owner

What Job Candidates Really Want  
Reskilling & Upskilling Existing Employees to Prevent Attrition  
Don't Call it Workplace Drama - When it is Actually Uncivil Behavior  
When to Cut the Cord on Poor Performing Employees

ACZ 4 Hours

1:00 pm - 5:00 pm

Marc Seltz, DVM, DACVR, DABVP

Diagnosing GI Obstructions  
Diagnosing Abdominal Organ Torsions  
No, It's Not Heart Failure: A Thoracic Radiography Case Series  
Imaging the Dyspneic Cat: A Case Series

ACZ 4 Hours

Dr./LVMT

Robert Zepelin

has successfully completed

8 Hours of Continuing Education

Lee M. Hughes, MSCVMA Executive Director

Approved by Tennessee Board of Veterinary Medical Examiners

STATE OF ARKANSAS VETERINARY MEDICAL EXAMINING BOARD 1 NATURAL RESOURCES DRIVE P.O. BOX 8505 LITTLE ROCK, AR 72215 (501) 224-2836	COMPLAINT AGAINST LICENSEE <input checked="" type="checkbox"/>  COMPLAINT AGAINST INDIVIDUAL <input type="checkbox"/> (If the complaint is being filed for practicing veterinary medicine without a license, please skip #4 below.)
--	--

**OFFICIAL COMPLAINT FORM**

Name of Complainant: <i>Julianne Henderson</i>			Name of Licensee or Individual: <i>DR. Bob Zepack</i>		
Address <i>13 Emanuel Village</i>		City <i>Hot Springs</i>	Zip <i>71909</i>	Address <i>4147 Highway 17N</i>	
Home Phone: <i>703-338-6720</i>		Business Phone:		City <i>Hot Springs</i>	
Email Address: <i>tabmar99@hotmail.com</i>			Zip <i>71909</i>		
Name of Clinic (if applicable) <i>Village Pet Services</i>					

**INSTRUCTIONS** for filing a complaint with the Arkansas Veterinary Medical Examining Board:

1. Give the full name and address of the licensee or individual that the complaint is against.
2. Type or print your statement on a separate sheet of paper and attach it to this form.
3. State facts briefly and clearly.
4. If the complaint is against a veterinarian, please specify below the violation of the Veterinary Medical Practice Act and/or Regulations that best applies to this case:

Ark. Code Ann. §17-101-305 of the Veterinary Medical Practice Act consists of the following for denial, suspension or revocation of a veterinarian's license (mark only ONE):

- |  |                              |                              |                              |                              |
|--|------------------------------|------------------------------|------------------------------|------------------------------|
| 1. <input type="checkbox"/>            | 6. <input type="checkbox"/>  | 11. <input type="checkbox"/> | 16. <input type="checkbox"/> | 21. <input type="checkbox"/> |
| 2. <input type="checkbox"/>            | 7. <input type="checkbox"/>  | 12. <input type="checkbox"/> | 17. <input type="checkbox"/> |                              |
| 3. <input type="checkbox"/>            | 8. <input type="checkbox"/>  | 13. <input type="checkbox"/> | 18. <input type="checkbox"/> |                              |
| 4. <input type="checkbox"/>            | 9. <input type="checkbox"/>  | 14. <input type="checkbox"/> | 19. <input type="checkbox"/> |                              |
| 5. <input checked="" type="checkbox"/> | 10. <input type="checkbox"/> | 15. <input type="checkbox"/> | 20. <input type="checkbox"/> |                              |

If you marked #11 above, please mark below a corresponding Regulation for Unprofessional Conduct (mark only ONE):

- |                             |                             |                             |                             |
|-----------------------------|-----------------------------|-----------------------------|-----------------------------|
| A. <input type="checkbox"/> | E. <input type="checkbox"/> | I. <input type="checkbox"/> | M. <input type="checkbox"/> |
| B. <input type="checkbox"/> | F. <input type="checkbox"/> | J. <input type="checkbox"/> | N. <input type="checkbox"/> |
| C. <input type="checkbox"/> | G. <input type="checkbox"/> | K. <input type="checkbox"/> | O. <input type="checkbox"/> |
| D. <input type="checkbox"/> | H. <input type="checkbox"/> | L. <input type="checkbox"/> | P. <input type="checkbox"/> |



Official Complaint Form  
Page #2

5. If the complaint is against a veterinary technician, please specify below the violation of the Veterinary Medical Practice Act that best applies to this case:

Ark. Code Ann. §17-101-308 of the Veterinary Medical Practice Act consists of the following for denial, suspension or revocation of a veterinary technician's certificate (mark only ONE):

- |          |           |           |
|----------|-----------|-----------|
| 1. _____ | 6. _____  | 11. _____ |
| 2. _____ | 7. _____  |           |
| 3. _____ | 8. _____  |           |
| 4. _____ | 9. _____  |           |
| 5. _____ | 10. _____ |           |

6. Furnish full names and complete addresses of all persons whom you think can confirm all or part of your allegations. They may submit statements as well.
7. Please be sure to give exact dates; if not possible, give month and year.
8. Enclose a copy of your pet's medical records from the veterinarian (if applicable).
9. Board policy states that a complaint must be filed within one year from the time the incident occurred until the time the complaint is filed.
10. The owner of the animal must file the complaint. The Board cannot accept a complaint filed by a second party.
11. Have this form notarized and return it with ALL information to the Board office.

*"I do solemnly swear or affirm that the information given in this affidavit is true, correct and complete to the best of my knowledge. I hereby authorize the Arkansas Veterinary Medical Examining Board to verify any and all information contained in this affidavit. This affidavit and signature shall act as authorization of entitles in possession of applicable information to release such information to the Arkansas Veterinary Medical Examining Board."*

*Julius Henderson* 11/7/19  
(Signature of Complainant) (Date)

Subscribed and sworn before me this 7<sup>th</sup> day of November, 2019.

*[Signature]*  
(Signature of Notary Public)

My Commission Expires: 6-1-2026



**Official Complaint Form  
Page #3**

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**LIST NAMES OF PERSONS WHO CAN CONFIRM ALL OR PART OF YOUR ENCLOSED STATEMENTS:**

---

<b>NAME</b>	<b>ADDRESS</b>	<b>CITY</b>	<b>ZIP</b>	<b>PHONE</b>
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<b>NAME</b>	<b>ADDRESS</b>	<b>CITY</b>	<b>ZIP</b>	<b>PHONE</b>
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<b>NAME</b>	<b>ADDRESS</b>	<b>CITY</b>	<b>ZIP</b>	<b>PHONE</b>
-------------	----------------	-------------	------------	--------------

**NOTICE: All complaints within the Board's jurisdiction must be in writing, signed and dated by the complainant, notarized and filed with the Director of the Board. The Director, upon receiving such complaint, may proceed to investigate the complaint and take statements from any person thought to have knowledge of any facts pertaining thereto.**

Written Statement regarding Lucy (cat) Henderson

On 10/23/19 I noticed my cat Lucy (4 yr old spayed female) was using the litter box quite frequently but not producing much liquid. I contacted Dr. Bob Zepeckl the next morning (10/24/19) and dropped her off at his clinic. He contacted me later that day confirming she had Cystitis and kept her overnight.

Dr. Bob contacted me on Friday 10/25/19 to come pick her up stating he had done all he could for her. I picked her up midafternoon around 2:15 pm, dropped her off at home and left for a 3:30 pm Doctor appt. When I returned, I found her curled up in a corner of the den covered in urine. I cleaned her up, dried her off and wrapped her in a towel. I left the house to walk my dogs and returned about 20 minutes later. I then found her curled up on the floor in front of the kitty box next to a pool of urine. I also noticed her eyes were glazed over and she was very limp when I picked her up. I called Dr. Bob's around 5 pm and spoke with the office manager clearly stating there was something seriously wrong with my kitty. He stated Dr. Bob was on his way to Chicago but he would get back to me as soon as possible. The office manager called me back about 45 minutes later stating Dr. Bob said I could bring her in and he (the office manager) could administer fluids or I could watch her overnight. I chose to watch her overnight. I set up a dog crate with a small litter box, towel, food, and water. I got up several times during the night to check on her noticing she had changed positions several times. On 10/26/19 around 6:30 am I found her dead in her crate laying in the same position from my last check on her around 2:00 AM; her body was completely stiff. I wrapped her in a towel and put her in my garage until I could make arrangements to dispose of her remains. I was never once offered or advised to go to the Little Rock ER Hospital. I would have definitely have taken her there had I known.

On Monday, 10/28/19, I contacted another hospital that I have taken one of my dogs to, for a consult with that veterinarian to help understand what had happened. We went over the vet records I had and made provisions for Lucy to be sent to the State Vet for a necropsy. I went back the next day after the consulting vet was able to obtain Lucy's Patient Chart for the incident. The following findings were observed.

- She was clearly fighting off a SEVERE infection and yet was vaccinated.
- She was given 3X the maximum recommended dosage of Furosemide unnecessarily in an effort to make her give a urine sample (even though she was staying overnight).
- She was given a Pen/Dex/B12 shot (a corticosteroid) which could have further suppressed her CRITICALLY LOW Immune system.

Her CBC revealed that her condition was critical, and she should not have been discharged, she should have been placed in ICU on an IV for comprehensive support (in an ER) with administration of IV antibiotics +/- plasma.

The consulting veterinarian notified me on Nov 1, 2019 the necropsy report indicated she had died from asphyxiation from a hairball lodged in her throat. I contend if she had not been in such a weakened/critical state and had gotten the care she should have been given; she would have been able to expel the hairball without any problem.

*Julianne Henderson*  
Julianne (Julie) Henderson,

November 07, 2019

**Village Pet Services**

4147 Hwy 7 N.  
Hot Springs, AR 71909  
501-625-3418

Patient Chart

Printed: 10-28-19 at 12:18p

CLIENT INFORMATION

Name Mr/Mrs. Julie Henderson (6828)  
Address 13 Emanuel Drive  
Hot Springs Village, AR 71909  
Phone 501 204-4020

PATIENT INFORMATION

Name	Lucy	Species	Feline
Sex	Female, Spayed	Breed	Ragdoll
Birthday	08-11-15	Age	4y
ID		Rabies	
Color	White And Tan	Weight	8.50 lbs
Reminded	05-29-19	Codes	

Follow Ups for: Lucy

10-28-19 Pen/Dex/B12 IM Cat

HEALTH HISTORY SUMMARY

Date	Diagnosis
10-24-19	Cystitis - Urinary
08-10-16	Ear Mites

PROBLEMS: Opened	By	Problem description	Closed	By
08-10-16	RZ	Exam - new kitten		
10-09-17	RZ	Well pet exam / Vac. update		

Lucy's weight history (in lbs)

10-09-17	8.50	10-24-19 ?
07-07-16	6.50	
08-10-16	6.00	

MEDICAL HISTORY

Date	By	Code	Description	Qty (Variance)	Photo
09-27-18	RZ	152961	Bravecto Feline 6.2-13.8lb	4	
11-16-18	RZ	773	Profender Feline dewormer large		
03-19-19	RZ	152961	Bravecto Feline 6.2-13.8lb		
08-17-19	RZ	773	Profender Feline dewormer large		
10-24-19	RZ	URINE 50 +	Urinalysis and Sediment		

Glu  
Ket

Patient Chart for Lucy  
 Date: 10-28-19, Time: 12:19p

Client: Mr/Mrs. Julie Henderson  
 Page: 2

Date	By	Code	Description	Qty (Variance)	Photo
			Blood	ca. 250	
			Ph	6.0 <<...l.... (7-7.5)	
			Prot	30	
			Urob	norm.	
			SG	1.015 .v..l.... (1.01-1.035)	
			Leuko	ca. 500	
			Nit	neg.	
			Color	pink/yellow	
			Appear	cloudy	

10-24-19 RZ RAD1 Digital X-Ray, Added Views  
 Lucy was admitted for tenesmus and tinged urine with some discomfort the X rays show a shrunken thickened bladder the abdomen has a substantial amount of fat the kidneys are visualized the liver is visualized the stomach is visualized the thorax and heart appeared normal and the spinal column appears normal CH: 10-24-19 at 10:24a: Done

RAD Digital X-Ray  
 CH: 10-24-19 at 10:24a: Done

122 Rabies, Feline Nobivac 1yr.  
 Doctor's Instructions - It is very important that Lucy receive the annual booster to provide immunity from this highly contagious disease.

ID: Serial: 316677 Expires: 03-20-20 Type: KV Mfg: NOBIV Admin: SC  
 13741 Bio-Hazard Fee  
 CBCF ScilVet CBC w/ diff Feline  
 CH: 10-24-19 at 10:24a: Done results entered

WBC	1.2 10 <sup>3</sup> /mm <sup>3</sup>	<<...l.... (5-19.5)
RBC	5.94 10 <sup>6</sup> /mm <sup>3</sup>	.v..l.... (5-11)
HGB	8.9 g/dl	v...l.... (8-15)
HCT	27.8 %	v...l.... (25-45)
MCV	47.0 fl	....l.v.. (39-50)
MCH	15.0 pg	....v.... (12.5-17.5)
MCHC	32.1 g/dl	.v..l.... (30-36)
RDW	16.2 %	....l.v. (13-17)
PLT	79.0 10 <sup>3</sup> /mm <sup>3</sup>	<<...l.... (200-500)
MPV	8.5 fl	.v..l.... (6.5-15)
%LYMP	37.4 %	...vl.... (0-100)
%MONO	2.8 %	v...l.... (0-100)
%GRAN	59.8 %	....lv... (0-100)
#LYMP	0.4 10 <sup>3</sup> /mm <sup>3</sup>	<<...l.... (1.8-6.5)
#MONO	0.0 10 <sup>3</sup> /mm <sup>3</sup>	<<...l.... (0.2-0.8)
#GRAN	0.8 10 <sup>3</sup> /mm <sup>3</sup>	<...l.... (2.8-13)
%EOS	3.9 %	

PAPF Chem Scil Panel Feline  
 CH: 10-24-19 at 10:24a: Done results entered

BUN	19.0	...vl.... (8-36)
GLU	129.0	....l.v. (56-153)
ALP	66.0	....lv... (14-102)
T-PRO	7.5	....lv... (5.9-8.4)
ALT	38.0	v...l.... (26-128)
CREA	1.6	....l.v.. (0.6-2)

Patient Chart for Lucy  
 Date: 10-28-19, Time: 12:19p

Client: Mr/Mrs. Julie Henderson  
 Page: 3

Date	By	Code	Description	Qty (Variance)	Photo
------	----	------	-------------	----------------	-------

10-24-19	RZ	13741 7770	Bio-Hazard Fee Idexx Feline FIV/Leuk		
----------	----	---------------	---	--	--

CH: 10-24-19 at 10:24a: Done results entered

Feline Fe/FIV (unknown)  
 Heartworm Negative  
 FIV Negative  
 Leukemia Negative

		13741 6178	Bio-Hazard Fee Furosemide Injection IM		
--	--	---------------	---	--	--

CH: 10-24-19 at 2:48p: Done

~~Furosemide~~ 1.0 50 mg/ml → max dose 15.45mg

		13741 903	Bio-Hazard Fee Fluids SC< Cat		
--	--	--------------	----------------------------------	--	--

ml 200.0

STAFF Staff Notes

CH: 10-24-19 at 10:33a: Patient was presented to clinic with complaints of possible UTI Doctor ordered a X-ray, blood work (CBC, and Spot Chem), and a urinalysis. Temp 102.8 X-ray shows bladder is empty doctor order 200cc of fluids and a ~~1cc furosemide injection~~ = 50mg

#### D2017 Cystitis - Urinary

Doctor's Instructions - Lucy has an inflammation of the lining of the bladder. This condition can be treated before it becomes serious. There is some discomfort or even pain involved. The condition may be caused partly by the disposition of the pet or even the diet. Once the primary cause has been determined by lab tests and possible xrays, medication and treatment will be prescribed. I generally recommend a change of diet also as 80% of my patients on a prescription diet do not have a relapse. Be patient, this condition may take a long time to heal.

		787	<del>Pen/Dex/B12 IM Cat</del>		
Pen		1.0	300,000u/ml		
Dex		1.0	2mg/ml		
B12		1.0	3000mcg/ml		

		13741 6268 6155	Bio-Hazard Fee Overnight stay, kitty Amoxi/Clav Drops #19282		
--	--	-----------------------	--	--	--

Give 1 dropperful twice daily for infection prevention

**Village Pet Services**

4147 Hwy 7 N.  
Hot Springs, AR 71909  
501-625-3418

Caring For All Your Friend's needs!!

**FOR:** Mr/Mrs. Julie Henderson  
13 Emanuel Drive  
Hot Springs Village, AR 71909  
(501) 204-4020

**Printed:** 10-25-19 at 2:18p  
**Date:** 10-25-19  
**Folder:** 6359  
**Invoice:** 89297

Date	For	Qty Description	Net Price
<b>Services by Robert G. Zepeckl, DVM</b>			
10-24-19	Lucy	1 Urinalysis and Sediment	48.50
10-24-19		1 X-Ray, Added Views 14x17	38.00
10-24-19		1 X-Ray, 14x17	63.00
10-24-19		1 Rabies, Feline Rabdome 1	17.00
10-24-19		1 Bio-Hazard Fee	1.00
10-24-19		1 SciVet CBC w/ diff Feline	37.50
10-24-19		1 Chem Soil Panel Feline	37.50
10-24-19		1 Bio-Hazard Fee	1.00
10-24-19		1 Idexx Feline FIV/Leuk	38.50
10-24-19		1 Bio-Hazard Fee	1.00
10-24-19		1 Furosemide Injection IM	15.50
10-24-19		1 Bio-Hazard Fee	1.00
10-24-19		1 Fluids SCZ Cat	37.00
10-24-19		1 Staff Notes	0.00
10-24-19		DIAGNOSIS: Cystitis - Urinary	0.00
10-24-19		1 Pen/Dex/B12 Cat	21.50
10-24-19		1 Bio-Hazard Fee	1.00
10-24-19		1 Overnight stay, kitty*	28.00
10-24-19		1 Amoxi/Clav Drops #19282	32.00
10-25-19	Shelby	1 Tri-Heart Plus Blue up to 25 lbs.	28.50
10-25-19		Visa payment	-449.74

Merchant ID: 4445046738484, Approval code: 025785, Transaction ID: 741981056  
Ref #: 1573, Act #: \*\*\*\*\*0154, Exp: XX/XX, Entry: Contactless, Card: VISA

Your card balance is not available

I AGREE TO PAY ABOVE TOTAL AMOUNT ACCORDING TO CARD ISSUER AGREEMENT

  
X \_\_\_\_\_

Old balance	Charges	Tax	Payments	New balance
-------------	---------	-----	----------	-------------



Asa Hutchinson  
Governor

## ARKANSAS DEPARTMENT OF AGRICULTURE

1 Natural Resources Drive, Little Rock, AR 72205  
agriculture.arkansas.gov  
(501) 225-1598



Wes Ward  
Secretary of Agriculture

November 19, 2019

Robert Zepecki, DVM  
4147 Hwy 7 N  
Hot Springs Village, AR 71909

Dear Dr. Zepecki,

The Arkansas Veterinary Medical Examining Board (Board) has received a complaint from Ms. Julianne Henderson against a veterinarian who provided care for her cat, Lucy. According to the complaint, you were the veterinarian who provided veterinary services to Lucy.

It is Board policy to obtain a reply to every complaint filed in its office; therefore, please find enclosed an Official Answer Form. Please outline, in detail, your treatment of Lucy and submit copies of the written and computerized medical records, test charts and billing statements. If applicable, please also provide controlled substance logs and/or radiographs.

Your reply is due within two weeks of your receipt of this letter. Please submit ALL information that you wish the Board to consider regarding this complaint.

Sincerely,

Cara Tharp, Director  
Veterinary Medical Examining Board  
Direct: (501) 224-2836

Enclosures: Answer Form  
Pamphlet  
Copy of Complaint

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <input checked="" type="checkbox"/> <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) _____ O. Date of Delivery _____</p>
<p>1. Article Addressed to:</p> <p>Dr. Robert Zepeck 4147 Hwy 7 N Hot Springs Village, AZ 71909</p>  <p>9590 9402 1750 6074 9859 18</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>2. Article Number (Transfer from service label)</p> <p>7018 1130 0001 3092 5414</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail _____ Restricted Delivery</p>
<p>PS Form 3811, July 2015 PSN 7530-02-000-9053 <span style="float: right;">Domestic Return Receipt</span></p>	

U.S. Postal Service™ <b>CERTIFIED MAIL® RECEIPT</b> <i>Domestic Mail Only</i>	
For delivery information, visit our website at <a href="http://www.usps.com">www.usps.com</a>	
<b>OFFICIAL USE</b>	
<p>Certified Mail Fee \$ _____</p> <p>Extra Services &amp; Fees (check box, add fee as appropriate)</p> <p><input type="checkbox"/> Return Receipt (hardcopy) \$ _____</p> <p><input checked="" type="checkbox"/> Return Receipt (electronic) \$ _____</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery \$ _____</p> <p><input type="checkbox"/> Adult Signature Required \$ _____</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery \$ _____</p> <p>Postage \$ _____</p> <p>Total Postage and Fees \$ _____</p>	<p>Postmark Here</p>
<p>Sent To <i>Dr. Robert Zepeck</i></p> <p>Street and Apt. No., or PO Box No. <i>4147 Hwy 7 N</i></p> <p>City, State, ZIP+4® <i>Hot Springs Village, AZ</i></p>	
<p>PS Form 3800, April 2015 PSN 7530-02-000-9050 <span style="float: right;">See Reverse for Instructions</span></p>	

**Cara Tharp**

---

**From:** Robert Zepecki <robertzepecki@gmail.com>  
**Sent:** Tuesday, December 3, 2019 8:11 AM  
**To:** Cara Tharp  
**Subject:** Henderson Complaint  
**Attachments:** 20191202\_101551.PDF; Lucy Henderson LAT XR.jpg; Lucy Henderson VD.jpg

Answer to complaint Lucy Henderson

Lucy was brought to me by a long time client Julie Henderson. She was incited by the Inexperience of Dr Wendle. Dr Wendle is not a pathologist. She is also in direct competition with me . I have been cleaning up her misdiagnoses for the past year or so.. Her lack of pharmacology knowledge is evident.

The lab work indicates either a sequestered abdominal abscess. Since the bladder was the target organ for this situation, I chose to treat accordingly. Dr Wendles statements to Mrs Henderson were inaccurate and showed a lack of experience or simply a lack of knowledge.

The literature indicated the half life of furosemide is 2 hours. The one time injection was routine to induce urination in a collection pan. Ms Henderson is well aware of the emergency clinic in Little Rock . She could have taken her friend there and evidently chose not to do so.

The assumptions given by Dr Wendle are flawed and out of her capabilities. Analyzing medical records for a dead animal she had not seen is armchair psychology . Had she not incited Ms Henderson , this complaint would not have been made.

A review of my lab reports and digital xrays shows an obese cat with a thickened bladder. The subcutaneous fluids were administered to offset any dehydration . The cat voided a sufficient amount of urine to run the urinalysis. The ua shows some pathology. The cat was anemic as the lab work indicates. I find this common in this breed.

As for the pen dex b12, this has been ridiculed by veterinary colleges.. However the procalne benzathine antibiotic which is parallel to the amoxicillin clavulanate has been my standard for years. As for the dexamethasone "depressing" her immunity. We all know that cats respond very well to steroids. The one time injection was simply for pain which it works for very well. The B12 added is a good appetite stimulant. The furosemide was given

The pathology report indicates a hairball in the esophagus. I am surprised at that finding since this cat was in no condition to groom itself and did not do so here.

You will note that she was in contact with my office several times. I was also available. She chose not call me directly on my cell as I am always available on my cell.

The comment about not referring her to the er in little rock is incorrect. I informed her that I would be out of town for one day to attend my aunt's funeral . She was informed about the er clinic in Little Rock. As a matter of simple fact she could have taken the cat to Dr Wendle.

respectfully,

Robert G Zepecki DVM



scil anlr  
151 N.

SP-4490 V2.05 10-24-2019 09:58  
No.0001 (009 )

# RESULT

**Animal ID:** 12742  
**Name:** LUCY  
**Date of birth:** 08/11/2015  
**Owner name:** HENDERSON  
**Species:** Cat  
**Owner first na:** JULIE

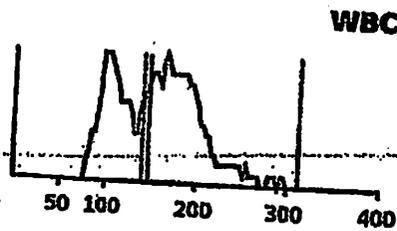
**Sample ID:** AUTOSID722  
**Analysis Date:** 10/24/2019 10:40:32 AM  
**Operator:** vet-tech

**MULTI-PANEL-V** **PLSK57**  
**1.BUN** **19 mg/dl**  
Normal Range [ 8 - 30 mg/dl  
**2.Glu** **129 mg/dl**  
Normal Range [ 75 - 145 mg/dl  
**3.ALP** **66 IU/L**  
Normal Range [ 13 - 269 IU/L  
**4.T-Pro** **7.5 g/dl**  
Normal Range [ 5.0 - 8.9 g/dl  
**5.ALT** **38 IU/L**  
Normal Range [ 14 - 161 IU/L  
**6.Cre** **1.6 mg/dl**  
Normal Range [ 0.5 - 2.0 mg/dl

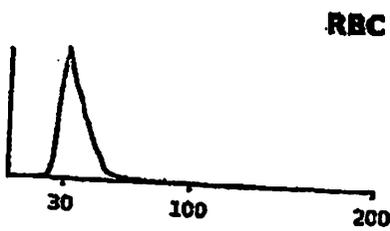
**Analysar Alarms**  
**Analysis Alarms.**

MIC, AG2

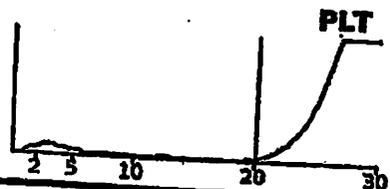
WBC	1.2	\$L 10 <sup>3</sup> /mm <sup>3</sup>	Normal range
LYM%	37.4	%	5.5 19.5
MON%	2.8	%	0.0 100.0
GRA%	59.8	%	0.0 100.0
(EOS%)	3.9	%	0.0 100.0
LYM#	0.40	\$L 10 <sup>3</sup> /mm <sup>3</sup>	1.60 6.50
MON#	0.00	\$L 10 <sup>3</sup> /mm <sup>3</sup>	0.20 0.60
GRA#	0.80	\$L 10 <sup>3</sup> /mm <sup>3</sup>	3.00 7.00
EOS#	0.04	\$ 10 <sup>3</sup> /mm <sup>3</sup>	0.00 0.60



RBC	5.94	10 <sup>3</sup> /mm <sup>3</sup>	5.00 11.00
HGB	8.9	g/dl	8.0 15.0
HCT	27.8	%	25.0 45.0
MCV	47	µm <sup>3</sup>	39 50
MCH	15.0	pg	12.8 17.5
MCHC	32.1	g/dl	30.0 36.0
RDW	16.2	%	13.0 17.0



PLT	79	L 10 <sup>3</sup> /mm <sup>3</sup>	200 500
MPV	8.5	µm <sup>3</sup>	6.5 15.0



Printed on 10/24/2019 10:40:34 AM

Printed by vet-tech

scil Vet abc Plus+. N° 704EVOH11366

**Village Pet Services**

**Patient Chart**

4147 Hwy 7 N.  
Hot Springs, AR 71909  
501-828-3418

Printed: 11-25-19 at 8:57a

**CLIENT INFORMATION**

Name: Mr/Mrs. Julie Henderson (8828)  
Address: 19 Emerald Drive  
Hot Springs Village, AR 71909

**PATIENT INFORMATION**

Name	Lucy	Species	Feline
Sex	Female, Spayed	Breed	Ragdoll
Birthday	08-11-16	Age	4y
ID		Rabies	
Color	White And Tan	Weight	8.60 lbs
Revisited	05-29-19	Codes	

Reminders for: Lucy		Last done
10/20	Rabies, Feline Rabdomuna-1	10-24-19
02/20	Profender Feline dewormer large	09-17-19

**HEALTH HISTORY SUMMARY**

Date      Diagnosis

10-24-19      Cystitis - Urinary  
08-10-16      Ear Mites

PROBLEMS:	Opened	By	Problem description	Closed	By
	08-10-16	RZ	Exam - new kitten		
	10-09-17	RZ	Well pet exam / Vac. update		

**Lucy's weight history (in lbs)**

10-09-17	8.60
07-07-16	8.60
08-10-16	8.00

**MEDICAL HISTORY**

Date	By	Code	Description	Qty (Variance)	Photo
09-27-18	RZ	162981	Bravecto Feline 6.2-13.6lb	4	
11-18-18	RZ	778	Profender Feline dewormer large		
	Items used:	03818042	Profender dewormer cat large	1.00	
03-18-19	RZ	162981	Bravecto Feline 6.2-13.6lb		
08-17-19	RZ	778	Profender Feline dewormer large		
	Items used:	03818042	Profender dewormer cat large	1.00	

Village Pet Services  
 #147 Hwy 7 N.  
 Hot Springs, AR 71909  
 501-828-3418

Patient Chart for Lucy  
 Date: 11-25-19, Time: 8:57a

Client: Mr/Mrs. Julie Handerson  
 Page: 2

Date	By	Code	Description	Qty (Variance)	Photo
10-24-19	RZ	URINE	Urinalysis and Sediment		
		GU			
		Ket	+		
		Blood	ca. 260		
		PH	6.0 <<... ... (7-7.6)		
		Prot	30		
		Urob	norm.		
		SG	1.015 .v.. ... (1.01-1.036)		
		Leuko	ca. 600		
		Nit	neg.		
		Color	pink/yellow		
		Appear	cloudy		

**RAD1 Digital X-Ray, Added Views**

Lucy was admitted for tenesmus and Enged urine with some discomfort the X rays show a shrunken thickened bladder the abdomen has a substantial amount of fat the kidneys are visualized the liver is visualized the stomach is visualized the thorax and heart appeared normal and the spinal column appears normal CH: 10-24-19 at 10:24a: Done

**RAD Digital X-Ray**

CH: 10-24-19 at 10:24a: Done

Items used:	122	Rebtes, Felina Nobivac 1yr.	
Serial: 316877	8111	Rebtes, Canine Nobivac 1yr.	1.00
ID:	19741	Bio-Hazard Fee	
	CBCF	SciVet CBC w/ diff Feline	

Expires: 03-20-20 Type: KV Mfg: NQBIV Admin: SO

CH: 10-24-19 at 10:24a: Done results entered

WBC	1.2 10 <sup>3</sup> /mm <sup>3</sup>	<<... ... (6-18.6)
RBC	5.84 10 <sup>6</sup> /mm <sup>3</sup>	.v.. ... (5-11)
HGB	8.9 g/dl	.v.. ... (8-16)
HCT	27.8 %	.v.. ... (28-46)
MCV	47.0 fl	... v.. (39-60)
MCH	18.0 pg	...v... (12.5-17.6)
MCHC	32.1 g/dl	..v.. ... (30-36)
RDW	18.2 %	... v.. (13-17)
PLT	78.0 10 <sup>3</sup> /mm <sup>3</sup>	<<... ... (200-500)
MPV	8.6 fl	.v.. ... (8.5-16)
%LYMP	37.4 %	...v ... (0-100)
%MONO	2.8 %	v... ... (0-100)
%GRAN	59.8 %	... v... (0-100)
#LYMP	0.4 10 <sup>3</sup> /mm <sup>3</sup>	<<... ... (1.8-8.5)
#MONO	0.0 10 <sup>3</sup> /mm <sup>3</sup>	<<... ... (0.2-0.8)
#GRAN	0.8 10 <sup>3</sup> /mm <sup>3</sup>	<... ... (2.8-13)
%EOS	3.9 %	

**PAFF Chem Sci Panel Feline**

CH: 10-24-19 at 10:24a: Done results entered

Items used:	SPOT8TRI Sci Spotchem Panel-V Test Strips	1.00
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Village Pet Services  
 4147 Hwy 7 N.  
 Hot Springs, AR 71909  
 501-828-3418

Patient Chart for Lucy  
 Date: 11-28-19, Time: 8:57a

Client: Mr/Mrs. Julie Henderson  
 Page: 3

Date	By	Code	Description	Qty (Variance)	Photo
		19.0	..v... (8-38)		
		129.0	...i.v. (88-159)		
		88.0	...i.v... (14-102)		
		7.5	...i.v... (8.9-8.4)		
		38.0	v...i... (28-128)		
		1.8	...i.v... (0.8-2)		

10-24-19 RZ 19741 Bio-Hazard Fee  
 7770 Idoxx Feline FIV/Leuk  
 CH: 10-24-19 at 10:24a: Done results entered

Feline Fel/FIV (unknown)  
 Heartworm Negative  
 FIV Negative  
 Leukemia Negative

18741 Bio-Hazard Fee  
 6178 Furosemide Injection IM  
 CH: 10-24-19 at 2:46p: Done

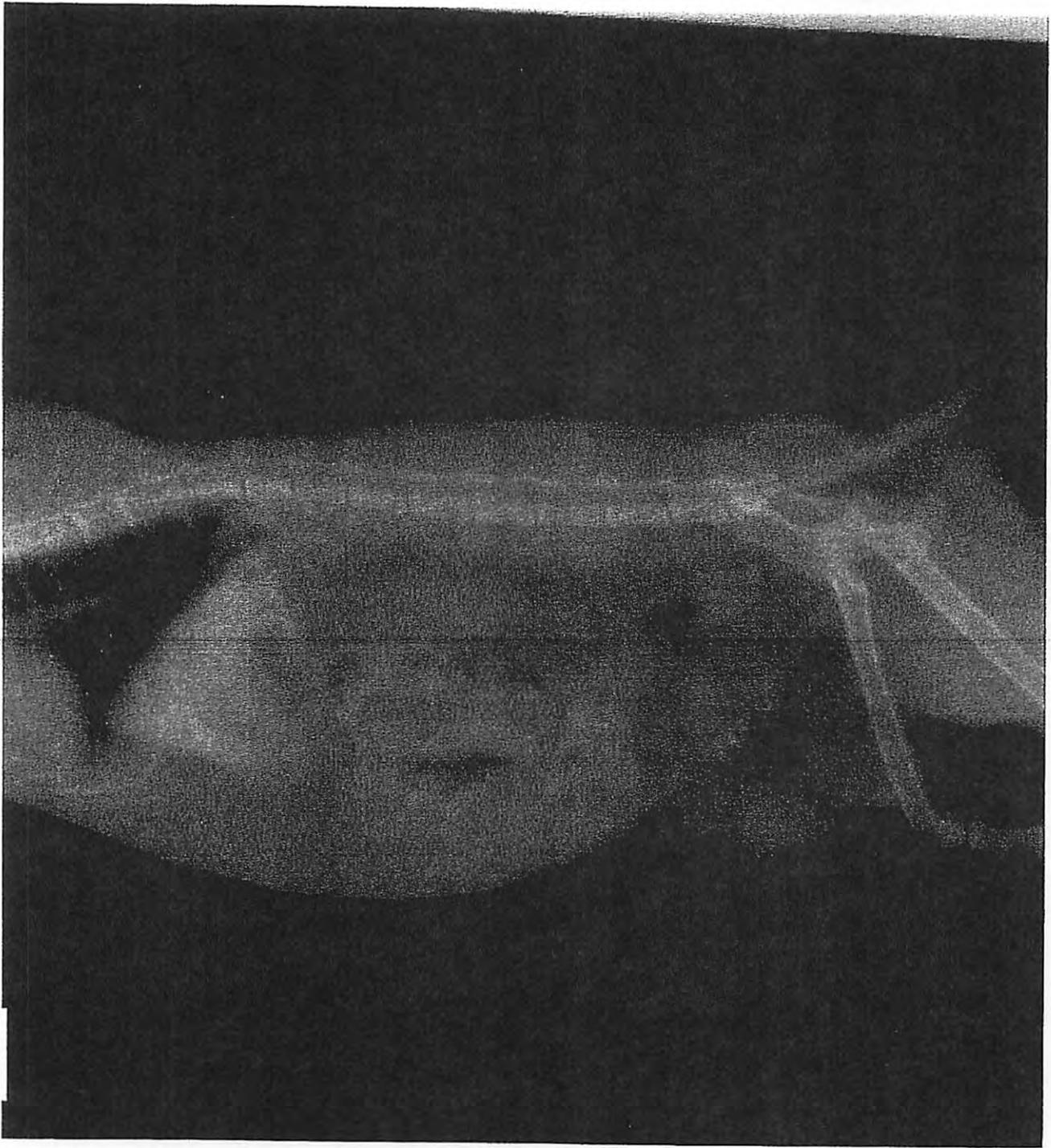
Items used: 7130 Furosemide liquid 10mg/ml 2oz 1.00  
 Furosemide 1.0 80 mg/ml

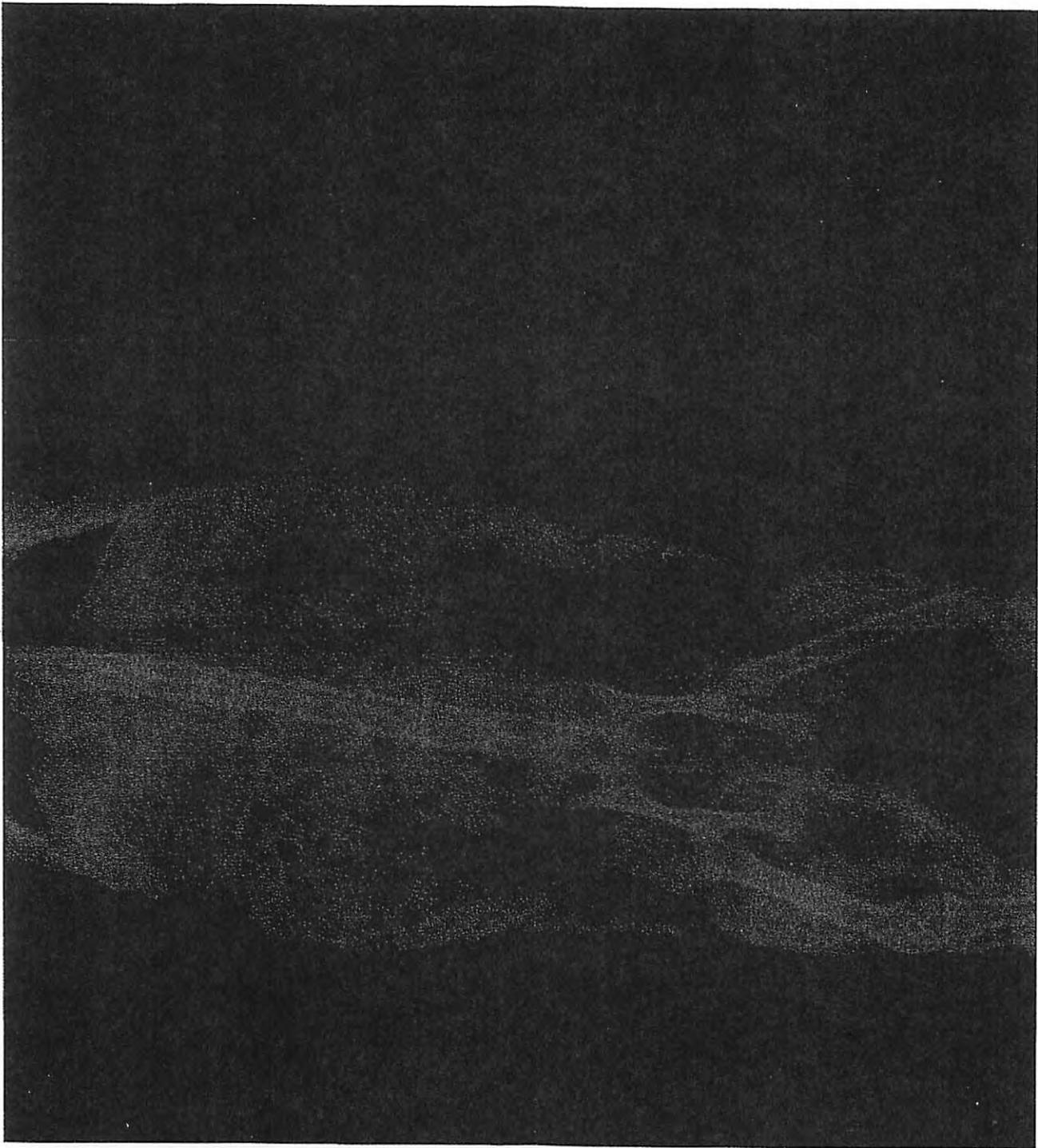
13741 Bio-Hazard Fee  
 909 Fluids 6G Cat  
 ml 200.0

STAFF Staff Notes  
 CH: 10-24-19 at 10:33a: Patient was presented to clinic with complaints of possible UTI Doctor ordered a X-ray, blood work (CBC, and Spot Chem), and a urinalysis Temp 102.8 X-ray shows bladder is empty doctor order 200cc of fluids and a 1cc furosemide injection

D2017 Cystitis - Urinary  
 787 Pen/Dex/B12 IM Cat  
 Pen 1.0 300,000u/ml  
 Dex 1.0 2mg/ml  
 B12 1.0 3000mcg/ml

13741 Bio-Hazard Fee  
 6288 Overnight stay, Kitty  
 6186 Amox/Clav Drops #16282  
 Give 1 dropperful twice daily for infection prevention





**Cara Tharp**

---

**From:** Robert Zepecki <robertzepecki@gmail.com>  
**Sent:** Tuesday, December 3, 2019 12:55 PM  
**To:** Cara Tharp  
**Subject:** Answer to complaint Lucy Henderson  
**Attachments:** Answer to complaint Lucy Henderson.docx

Answer to complaint Lucy Henderson

Lucy was brought to me by a long time client Julie Henderson. She was incited by the inexperience of Dr Wendle. Dr Wendle is not a pathologist. She is also in direct competition with me. I have been cleaning up her misdiagnoses for the past year or so.. Her lack of pharmacology knowledge is evident.

The lab work indicates a sequestered abdominal infection. Since the bladder was the target organ for this situation, I chose to treat accordingly. Dr Wendle's statements to Mrs Henderson were inaccurate and showed a lack of experience or simply a lack of knowledge.

The literature indicates the half life of furosemide is 2 hours. The one time injection was routine to induce urination in a collection pan. The injection was given on Thursday and fluids administered. She was kept overnight. I told Ms Henderson I would be out of town Friday afternoon until Sunday but would be in constant contact by cell phone. The one time steroid injection was administered for pain from frequent urination. It was administered on Thursday.

Ms Henderson is well aware of the emergency clinic in Little Rock. She could have taken her friend there and evidently chose not to do so.

The assumptions given by Dr Wendle are flawed and out of her capabilities. Analyzing medical records for a dead animal she had not seen is armchair psychology. Had she not been incited by giving her incorrect information, this complaint would not have been made.

A review of my lab reports and digital xrays shows an obese cat with a thickened bladder. The subcutaneous fluids were administered to offset any dehydration. The cat voided a sufficient amount of urine to run the urinalysis. The ua shows some pathology. The cat was anemic as the lab work indicates. I find this common in this breed. The effects of the furosemide were gone by the next day.

As for the pen dex b12, this has been ridiculed by veterinary colleges.. However the procaine benzathine antibiotic which is parallel to the amoxicillin clavulanate has been my standard for years. As for the dexamethasone "depressing" her immunity. We all know that cats respond very well to steroids. The one time injection was simply for pain which it works for very well. The B12 added is a good appetite stimulant. The furosemide was given one time for diuresis.

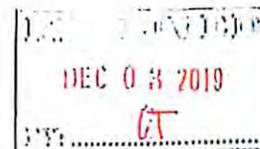
The pathology report indicates a hairball in the esophagus. I am surprised at that finding since this cat was in no condition to groom itself and did not do so here.

You will note that she was in contact with my office several times. I was also available. She chose not call me directly on my cell as I am always available on my cell.

The comment about not referring her to the er in little rock is incorrect. I informed her that I would be out of town for one day to attend my aunt's funeral. She was informed about the er clinic in Little Rock. As a matter of simple fact she could have taken the cat to Dr Wendle when it was still alive for treatment. Arm chair diagnosis on a dead cat is unprofessional and fraudulent.

respectfully,

Robert G Zepecki DVM



**Cara Tharp**

---

**From:** Robert Zepecki <allpetcentersv@gmail.com>  
**Sent:** Tuesday, April 28, 2020 8:32 AM  
**To:** Cara Tharp  
**Subject:** Re: Henderson Complaint  
**Attachments:** 20200427\_122417.PDF

On Tue, Apr 28, 2020 at 8:23 AM Cara Tharp <[Cara.Tharp@agriculture.arkansas.gov](mailto:Cara.Tharp@agriculture.arkansas.gov)> wrote:

I did not receive anything yesterday. Please resend.

Thank you,

Cara

**From:** [allpetcentersv@gmail.com](mailto:allpetcentersv@gmail.com) <[allpetcentersv@gmail.com](mailto:allpetcentersv@gmail.com)>  
**Sent:** Tuesday, April 28, 2020 7:48 AM  
**To:** Cara Tharp <[Cara.Tharp@agriculture.arkansas.gov](mailto:Cara.Tharp@agriculture.arkansas.gov)>  
**Subject:** RE: Henderson Complaint

The document sent in my response was incomplete because one of the provisional information sections of staff notes, which were dictated by me at that time were not included in the reply. I forwarded yesterday. Will forward again today with both examples. Dr bob

**From:** Cara Tharp <[Cara.Tharp@agriculture.arkansas.gov](mailto:Cara.Tharp@agriculture.arkansas.gov)>  
**Sent:** Monday, April 27, 2020 11:31 AM  
**To:** [allpetcentersv@gmail.com](mailto:allpetcentersv@gmail.com)  
**Subject:** FW: Henderson Complaint

Dear Dr. Zepecki,

I am forwarding the email you sent me that was your response to the Henderson complaint. What information was not included that should have been?

Thank you,

Cara

**From:** Robert Zepecki <[robertzepecki@gmail.com](mailto:robertzepecki@gmail.com)>  
**Sent:** Tuesday, December 3, 2019 8:11 AM  
**To:** Cara Tharp <[Cara.Tharp@agriculture.arkansas.gov](mailto:Cara.Tharp@agriculture.arkansas.gov)>  
**Subject:** Henderson Complaint



4147 North Highway 7  
Hot Springs Village, AR 71909  
Clinic: (501)625-3418  
Emergency: (501)626-0237  
robertzepeckl@gmail.com

Monday, April 27, 2020

RE: Docket No. 2019-20; Julianne Henderson

Dear Ms. Tharp,

I am writing to you in regards to the complaint made against Dr. Zepeckl by Ms. Julianne Henderson. It is my understanding that a decision has been made by the board; stating that there has been a violation of rule 092.00.1-5 (Record Keeping 9. E.) within the Veterinary Medical Practice Act and Rules. I am officially requesting a reconsideration in this matter due to an error in our submittal. When preparing the documentation for submittal to you and the board, an error was made in Avimark, our practice management software, that regretfully left out all notes and documentation from the encounter. I entered the information dictated to me by Dr. Zepeckl into the record on the day of the office visit. Due to this error in printing the final document the full report was not accurately submitted, we are resubmitting the encounter documentation that shows all the documentation from the encounter so that this issue can be resolved.

Thank you for your help in the matter and please do not hesitate to contact me with any questions or concerns.

Sincerely,

Cassie L. Hooper, CVA

Veterinary Assistant

Subscribed and sworn before me this 27<sup>th</sup> day of April, 2020

Notary Public

My Commission Expires: 03/24/2029



**Village Pet Services**

4147 Hwy 7 N.  
Hot Springs, AR 71909  
601-625-3418

**Patient Chart**

Printed: 04-27-20 at 8:13a

**CLIENT INFORMATION**

Name Mr/Mrs. Julie Henderson (6828)  
Address 19 Emanuel Drive  
Hot Springs Village, AR 71909  
Phone 601 204-4020

**PATIENT INFORMATION**

Name	Lucy	Species	Feline
Sex	Female, Spayed	Breed	Ragdoll
Deceased	01-30-20	Age	D@4y
ID		Rabies	
Color	White And Tan	Weight	8.60 lbs
Reminded	01-30-20	Codes	D

**HEALTH HISTORY SUMMARY**

Date	Diagnosis
10-24-19	Cystitis - Urinary
08-10-18	Ear Mites

PROBLEMS: Opened	By	Problem description	Closed	By
08-10-18	RZ	Exam - new kitten		
10-09-17	RZ	Well pet exam / Vac. update		

**Lucy's weight history (in lbs)**

10-09-17	8.60
07-07-18	8.60
08-10-18	8.00

**MEDICAL HISTORY**

Date	Time	By	Code	Description	Qty (Variance)	Photo
10-24-19	2:58p	RZ	8156	Amoxi/Clav Drops #19282 Give 1dropperful twice daily for infection prevention		
	2:58p		6268	Overnight stay, kitty		
	2:58p		18741	Bio-Hazard Fee		
	2:58p		787	Pen/Dex/B12 IM Cat		
	Pen		1.0	300,000u/ml		
	Dex		1.0	2mg/ml		
	B12		1.0	3000mcg/ml		
	2:84p		D2017	Cystitis - Urinary Doctor's instructions - Lucy has an inflammation of the lining of the bladder. This condition can be treated before it becomes serious. There is some discomfort or even		

Patient Chart for Lucy  
 Date: 04-27-20, Time: 8:13a

Client: Mr/Mrs. Julie Henderson  
 Page: 2

Date	Time	By	Code	Description	Qty (Variance)	Photo
------	------	----	------	-------------	----------------	-------

pain involved. The condition may be caused partly by the disposition of the pet or even the diet. Once the primary cause has been determined by lab tests and possible xrays, medication and treatment will be prescribed. I generally recommend a change of diet also as 80% of my patients on a prescription diet do not have a relapse. Be patient, this condition may take a long time to heal.

10-24-19 10:32a RZ STAFF Staff Notes  
 CH: 10-24-19 at 10:33a: Patient was presented to clinic with complaints of possible UTI Doctor ordered a X-ray, blood work (CBC, and Spot Chem), and a urinalysis Temp 102.8 X-ray shows bladder is empty doctor order 200cc of fluids and a 1cc furosemide Injection

10:32a 803 Fluids SC< Cat  
 ml 200.0

10:32a 13741 Bio-Hazard Fee  
 10:32a 8178 Furosemide Injection IM  
 CH: 10-24-19 at 2:48p: Done

Furosemide 1.0 50 mg/ml

10:28a 13741 Bio-Hazard Fee  
 10:18a 7770 Idox Feline FIV/Leuk  
 CH: 10-24-19 at 10:24a: Done results entered

Feline Fel/FIV (unknown)  
 Heartworm Negative  
 FIV Negative  
 Leukemia Negative

9:32a 13741 Bio-Hazard Fee  
 9:32a PAPP Chem Sci Panel Feline  
 CH: 10-24-19 at 10:24a: Done results entered

BUN 19.0 ...v... (8-38)  
 GLU 129.0 ...l.v. (68-159)  
 ALP 68.0 ...v... (14-102)  
 T-PRO 7.5 ...v... (5.9-8.4)  
 ALT 38.0 v...l... (28-128)  
 CREA 1.6 ...l.v.. (0.6-2)

9:32a CBCF SciVet CBC w/ diff Feline  
 CH: 10-24-19 at 10:24a: Done results entered

WBC 1.2 10<sup>3</sup>/mm<sup>3</sup> <<...l... (5-19.5)  
 RBC 5.94 10<sup>6</sup>/mm<sup>3</sup> .v...l... (5-11)  
 HGB 8.9 g/dl v...l... (8-15)  
 HCT 27.8 % v...l... (25-45)  
 MCV 47.0 fl ...l.v.. (89-50)  
 MCH 15.0 pg ...v... (12.5-17.5)  
 MCHC 32.1 g/dl .v...l... (30-38)  
 RDW 18.2 % ...l.v. (13-17)  
 PLT 79.0 10<sup>3</sup>/mm<sup>3</sup> <<...l... (200-800)  
 MPV 8.5 fl .v...l... (8.8-16)  
 %LYMP 37.4 % ...v... (0-100)

Patient Chart for Lucy  
 Date: 04-27-20, Time: 8:13a

Client: Mr/Mrs. Julie Henderson Page: 3

Date	Time	By	Code	Description	Qty (Variance)	Photo
				%MONO 2.8 % v... (0-100)		
				%GRAN 69.8 % v... (0-100)		
				#LYMP 0.4 10 <sup>3</sup> /mm <sup>3</sup> <<... (1.8-8.5)		
				#MONO 0.0 10 <sup>3</sup> /mm <sup>3</sup> <<... (0.2-0.8)		
				#GRAN 0.8 10 <sup>3</sup> /mm <sup>3</sup> <... (2.8-13)		
				%EOS 3.9 %		
10-24-19	9:32a	RZ	19741	Bio-Hazard Fee		
	9:32a		122	Rabies, Feline Nobivac 1yr.		
				Doctor's instructions - it is very important that Lucy receive the annual booster to provide immunity from this highly contagious disease.		
ID:	Serial: 316877			Expires: 09-20-20	Type: KV	Mfg: NOBIV Admin: SC
	9:32a		RAD	Digital X-Ray		
				CH: 10-24-19 at 10:24a: Done		
	9:32a		RAD1	Digital X-Ray, Added Views		
				Lucy was admitted for tenesmus and tinged urine with some discomfort the X rays show a shrunken thickened bladder the abdomen has a substantial amount of fat the kidneys are visualized the liver is visualized the stomach is visualized the thorax and heart appeared normal and the spinal column appears normal		
	9:32a		URINE	Urinalysis and Sediment		
			Glu	60		
			Ket	+		
			Blood	ca. 250		
			Ph	6.0 <<... (7-7.5)		
			Prot	30		
			Urob	norm.		
			SG	1.015 v... (1.01-1.036)		
			Leuko	ca. 600		
			Nit	neg.		
			Color	pink/yellow		
			Appear	cloudy		
08-17-19	11:37a	RZ	773	Profender Feline dewormer large		
03-19-19	1:37p	RZ	162881	Bravecto Feline 6.2-13.8lb		
11-16-18	12:08p	RZ	773	Profender Feline dewormer large		
09-27-18	12:54p	RZ	162881	Bravecto Feline 6.2-13.8lb		4

scil ani  
151 I

SP-4490 V2.05 10-24-2019 09:58  
No.0001 (006 )

**RESULT**

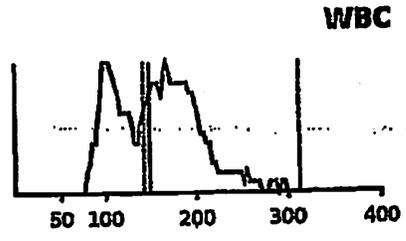
<b>Animal ID</b> 12742	<b>Owner name</b> HENDERSON	<b>Owner first</b> JULIE
<b>Name</b> LUCY	<b>Species</b> Cat	
<b>Date of birth</b> 08/11/2015		
<b>Sample ID</b> AUTOSID722	<b>Analysis Date</b> 10/24/2019 10:40:32 AM	<b>Operator</b> vet-tech

MULTI-PANEL-V  
FL6257

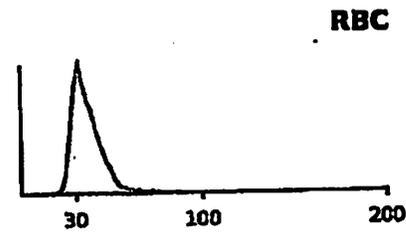
1.BUN	19 mg/dl
Normal Range [	8 - 30 mg/dl ]
2.Glu	129 mg/dl
Normal Range [	75 - 145 mg/dl ]
3.ALP	66 IU/L
Normal Range [	19 - 289 IU/L ]
4.T-Pro	7.5 g/dl
Normal Range [	5.0 - 8.3 g/dl ]
5.ALT	38 IU/L
Normal Range [	14 - 161 IU/L ]
6.Cre	1.6 mg/dl
Normal Range [	0.5 - 2.0 mg/dl ]

**Analysers Alarms**  
**Analysis Alarms** MIC, AG2

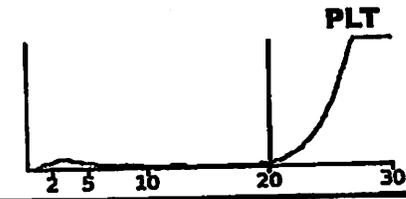
			Normal range
WBC	1.2	\$L 10 <sup>3</sup> /mm <sup>3</sup>	5.5 19.5
LYM%	37.4	\$ %	0.0 100.0
MON%	2.8	\$ %	0.0 100.0
GRA%	59.8	\$ %	0.0 100.0
(EOS%)	3.9	\$ %	0.0 100.0
LYM#	0.40	\$L 10 <sup>3</sup> /mm <sup>3</sup>	1.80 6.50
MON#	0.00	\$L 10 <sup>3</sup> /mm <sup>3</sup>	0.20 0.80
GRA#	0.80	\$L 10 <sup>3</sup> /mm <sup>3</sup>	3.00 7.00
EOS#	0.04	\$ 10 <sup>3</sup> /mm <sup>3</sup>	0.00 0.60



RBC	5.94	10 <sup>6</sup> /mm <sup>3</sup>	5.00 11.00
HGB	8.9	g/dl	8.0 15.0
HCT	27.8	%	25.0 45.0
MCV	47	µm <sup>3</sup>	39 50
MCH	15.0	pg	12.5 17.5
MCHC	32.1	g/dl	30.0 36.0
RDW	16.2	%	13.0 17.0



PLT	79	L 10 <sup>3</sup> /mm <sup>3</sup>	200 500
MPV	8.5	µm <sup>3</sup>	6.5 15.0



**Cara Tharp**

---

**From:** Spaw City Animal Hospital <spawcityanimalhospital@gmail.com>  
**Sent:** Friday, January 3, 2020 2:44 PM  
**To:** Cara Tharp  
**Subject:** ATTN: Cara Tharp Requested Necropsy Report Attached  
**Attachments:** Necropsyreport.pdf



# Veterinary Diagnostic Laboratory

Arkansas Livestock & Poultry Commission

1 Natural Resources Drive, Little Rock, AR 72205 - Phone : 501-823-1730 - Fax: 501-907-2410

**Case Number: 19-L13758**

Sample Collected: 10/28/19

Sample Received: 10/29/19

Premise ID: NA

Report Generated: 10/30/19

Dr. Lindsey Windle

Spaw City Animal Hospital

4013 N. Highway 7

Suite D

Hot Springs Village, AR 71909

Denise Apperson, PhD, DVM

Veterinary Diagnostician

Owner: Julie Henderson

Animal ID: Lucy (2698)

Breed: Feline

Phone: (501) 204-5020

Fax #: (501) 204-5022

## Final Report 10/30/19 09:11

### Diagnosis

1 CHOKE

**Necropsy Small Animal** Verified by JIN XIE on 10/30/19

Spec #	Test	Sample ID	Specimen	Result
1	Necropsy Small Animal	Lucy (2698)	Cadaver	Sec Comments

### Comment:

**Clinical History:** Presented 10/24 at another vet for frequent trips to litter box with little urine output, stayed overnight 10/24-10/25 at Vet and was discharged 10/25 for home, passed away. Was administered furosemide, Pen/Dex/B12 oral Clavamox overnight, lab revealed severe leukopenia, FeLV/FIV negative.

**Gross Examination:** A dead 5-year-old, spayed female cat was presented for necropsy on 10/29/19. The subcutaneous and visceral fat tissue store were extreme (body condition score 5/5). The carcass had mild autolysis. There was an elongated hairball of approximately 2x4cm lodged in the esophagus subjacent to the larynx; the affected esophagus was transmurally, mildly necrotic. The front of the hairball was bent and partially occluded the larynx. The stomach contained approximately 50 ml of gray mucoid liquid. The colon and cecum contained multiple segmental firm feces. Other organs were grossly unremarkable. Diffusely, the lungs were dark red, rubbery, and buoyant in the formalin. The urinary bladder was empty. The remaining organs/tissues were unremarkable.

**Gross Diagnosis: final**

Choke

The cause of death of this cat is likely due to hairball choke which is suggested by necrosis in the affected esophagus. Histopathology may not provide further information. The case will be closed at this stage. We collected tissues from this animal which will be saved for 2 weeks from the necropsy date. If you want to pursue histopathology, please contact us.

This is a confidential report for official use only.

*All results are for samples as received.*

End of Report



**Lab Bulletin: The lab now offers secure, after-hours sample delivery through Eagle Couriers.  
Please call 501-438-9894 for more information.**

STATE OF ARKANSAS VETERINARY MEDICAL EXAMINING BOARD 1 NATURAL RESOURCES DRIVE P.O. BOX 8505 LITTLE ROCK, AR 72215 (501) 224-2836	COMPLAINT AGAINST LICENSEE <input checked="" type="checkbox"/>  COMPLAINT AGAINST INDIVIDUAL <input type="checkbox"/> (If the complaint is being filed for practicing veterinary medicine without a license, please skip #4 below.)
--	--

**OFFICIAL COMPLAINT FORM**

Name of Complainant: <i>Alyssa Easterling</i>			Name of Licensee or Individual: <i>Dr. Robert Zepecki</i>		
Address	City	Zip	Address	City	Zip
<i>2907 Hot Springs Hwy</i>	<i>Benton</i>	<i>72019</i>	<i>4147 N. State Hwy 7</i>	<i>Hot Springs Village</i>	<i>71909</i>
Home Phone: <i>501-722-7303</i>		Business Phone:		Name of Clinic (if applicable)	
Email Address: <i>ake2000@yahoo.com</i>		<i>Village Animal Group</i>			

**INSTRUCTIONS** for filing a complaint with the Arkansas Veterinary Medical Examining Board:

1. Give the full name and address of the licensee or individual that the complaint is against.
2. Type or print your statement on a separate sheet of paper and attach it to this form.
3. State facts briefly and clearly.
4. If the complaint is against a veterinarian, please specify below the violation of the Veterinary Medical Practice Act and/or Regulations that best applies to this case:

Ark. Code Ann. §17-101-305 of the Veterinary Medical Practice Act consists of the following for denial, suspension or revocation of a veterinarian's license (mark only ONE):

- |  |                              |                              |                              |                              |
|--|------------------------------|------------------------------|------------------------------|------------------------------|
| 1. <input type="checkbox"/>            | 6. <input type="checkbox"/>  | 11. <input type="checkbox"/> | 16. <input type="checkbox"/> | 21. <input type="checkbox"/> |
| 2. <input type="checkbox"/>            | 7. <input type="checkbox"/>  | 12. <input type="checkbox"/> | 17. <input type="checkbox"/> |                              |
| 3. <input type="checkbox"/>            | 8. <input type="checkbox"/>  | 13. <input type="checkbox"/> | 18. <input type="checkbox"/> |                              |
| 4. <input type="checkbox"/>            | 9. <input type="checkbox"/>  | 14. <input type="checkbox"/> | 19. <input type="checkbox"/> |                              |
| 5. <input checked="" type="checkbox"/> | 10. <input type="checkbox"/> | 15. <input type="checkbox"/> | 20. <input type="checkbox"/> |                              |

If you marked #11 above, please mark below a corresponding Regulation for Unprofessional Conduct (mark only ONE):

- |                             |                             |                             |                             |
|-----------------------------|-----------------------------|-----------------------------|-----------------------------|
| A. <input type="checkbox"/> | E. <input type="checkbox"/> | I. <input type="checkbox"/> | M. <input type="checkbox"/> |
| B. <input type="checkbox"/> | F. <input type="checkbox"/> | J. <input type="checkbox"/> | N. <input type="checkbox"/> |
| C. <input type="checkbox"/> | G. <input type="checkbox"/> | K. <input type="checkbox"/> | O. <input type="checkbox"/> |
| D. <input type="checkbox"/> | H. <input type="checkbox"/> | L. <input type="checkbox"/> | P. <input type="checkbox"/> |

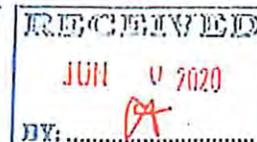


EXHIBIT 6

Official Complaint Form  
Page #2

5. If the complaint is against a veterinary technician, please specify below the violation of the Veterinary Medical Practice Act that best applies to this case:

Ark. Code Ann. §17-101-308 of the Veterinary Medical Practice Act consists of the following for denial, suspension or revocation of a veterinary technician's certificate (mark only ONE):

- |          |           |           |
|----------|-----------|-----------|
| 1. _____ | 6. _____  | 11. _____ |
| 2. _____ | 7. _____  |           |
| 3. _____ | 8. _____  |           |
| 4. _____ | 9. _____  |           |
| 5. _____ | 10. _____ |           |

6. Furnish full names and complete addresses of all persons whom you think can confirm all or part of your allegations. They may submit statements as well.
7. Please be sure to give exact dates; if not possible, give month and year.
8. Enclose a copy of your pet's medical records from the veterinarian (if applicable).
9. Board policy states that a complaint must be filed within one year from the time the incident occurred until the time the complaint is filed.
10. The owner of the animal must file the complaint. The Board cannot accept a complaint filed by a second party.
11. Have this form notarized and return it with ALL information to the Board office.

"I do solemnly swear or affirm that the information given in this affidavit is true, correct and complete to the best of my knowledge. I hereby authorize the Arkansas Veterinary Medical Examining Board to verify any and all information contained in this affidavit. This affidavit and signature shall act as authorization of entities in possession of applicable information to release such information to the Arkansas Veterinary Medical Examining Board."

[Signature]      05/27/2020  
(Signature of Complainant)      (Date)

Subscribed and sworn before me this 27 day of May, 2020

[Signature]  
(Signature of Notary Public)

My Commission Expires: 7.23.2023



Official Complaint Form  
Page #3

LIST NAMES OF PERSONS WHO CAN CONFIRM ALL OR PART OF YOUR ENCLOSED STATEMENTS:

NAME	ADDRESS	CITY	ZIP	PHONE
Dr. Kelly	1910 Albert Pike Rd. #E	Hot Springs	71913	501-623-5781
NAME	ADDRESS	CITY	ZIP	PHONE
NAME	ADDRESS	CITY	ZIP	PHONE

NOTICE: All complaints within the jurisdiction of the Board must be in writing, signed and dated by the complainant, notarized and filed with the Executive Director of the Board. The Executive Director, upon receiving such complaint, may proceed to investigate the complaint and take statements from any person thought to have knowledge of any fact(s) pertaining thereto.

8:00 a.m. May 15, 2020 Dr. Robert Zepecki was given consent to de-claw and neuter Simba. During the surgery, Dr. Zepecki made two incisions, leaving only a thin piece of skin between the two incisions laterally and a thin piece of skin between the top of the incisions and the bottom of the anus. Dr. Zepecki continued on to pull out pieces of what he said were the testicles, using forceps, and cut off three separate pieces from the area, using a surgical razor blade (Figure 1a, Figure 1b, and Figure 1c). Dr. Zepecki then went on to say that the area would need sutured and instructed me to put clot-it powder on a sterile piece of gauze and apply it to the skin, squeezing, in order to stop the bleeding. Dr. Zepecki continued on to de-claw Simba while I held the area with the gauze. Once the paws were bandaged, and the de-claw was complete, Dr. Zepecki instructed Cassie Hooper to suture the area I was holding with small dissolvable suture and afterwards took his gloves off and left the room. Cassie Hooper was forced to try and close up the area as well as possible. During the closing, we both noticed that there appeared to be no anus present. It was difficult to distinguish which hole was supposed to be his anus and which parts of his skin should be sewn back together. Once Cassie Hooper had sutured the two incision areas, Cassie attempted to take Simba's temperature in order to confirm that the remaining hole was indeed his anus. When the thermometer was pulled out, there was no feces on the tip. I then took pictures of the pieces Dr. Zepecki had cut out during surgery and took a picture of Simba's sutured area (Figure 1a, Figure 1b, Figure 1c, and Figure 2). Dr. Zepecki was then called back to the operating room once more to ensure that Simba was still going to be able to have a normal bowel movement. Dr. Zepecki attempted to confirm the hole was the anus, once again using the thermometer. When there still appeared to be no feces on the tip, Dr. Zepecki inserted a long pair of forceps into the hole (Figure 3). When the forceps were removed, there was some yellow-brown colored feces on the instrument. After this finding, Dr. Zepecki stated that Simba would be fine and able to have a bowel movement. Dr. Zepecki released Simba into my care when I got off work at 3:00 p.m. that same day. After arriving at my home, Simba was placed in a closed off bedroom and allowed to sleep. Later, around 4:30 p.m., I went to check on him and noticed that Simba had pieces of feces coming out of the hole but did not appear to realize what was happening. The feces also clung to Simba's body and was not pinched off as a normal bowel movement. I proceeded to clean off the sutured area with a dry tissue, I left Simba in the room to sleep and kept checking on Simba every hour or two to ensure the area was still clean. At 10:30 p.m. that night I heard Simba crying and went in the bedroom to find him pushing out a couple pieces of feces again. The bowel movement appeared to be pushed out with his cries.

May 16, 2020 at 8:45 a.m. I woke up to find Simba crying, and Simba had pieces of feces once again stuck to the sutured area. Throughout the day, Simba appeared to figure out when the bowel movements needed to occur because Simba made it into the litter pan; however, every time the bowel movements occurred, Simba had pieces of feces stuck to the sutures. Simba had no cone on and began licking the feces off, cleaning himself.

May 17, 2020 at 7:00 a.m. I reported to work again, and Dr. Zepecki asked me how Simba was doing. After telling Dr. Zepecki what had been occurring at home, Dr. Zepecki advised me to bring Simba up to the clinic again and allow him to check his sutures. Dr. Zepecki also stated that he thought the area could need another surgery to draw the tissue surrounding the remaining hole together. Dr. Zepecki stated that he did not know how he could have cut off his anus. That night when I got home, I took a picture of Simba's sutured area (Figure 4).

May 18, 2020 around 9:30 a.m. after hearing everything that had been going on, Cassie Hooper called Kelly Veterinary Clinic and told them what we thought had happened, that Dr. Zepecki had gone into

surgery to de-claw and neuter Simba but might have cut off part of his anus. Dr. Kelly considered this an emergency and told me to bring Simba over to her clinic immediately. Austin Jordan, my fiancé, took Simba to be treated at Kelly Veterinary Clinic in Hot Springs, Arkansas. Dr. Kelly took him into surgery, re-opened the sutured area and cleaned out an infection, re-sutured the area, and when exploring the male parts, found that Simba had not been neutered (Figure 5). Dr. Kelly proceeded to neuter him and preserved his testicles for me to collect when I picked Simba up (Figure 6a and Figure 6b). Dr. Kelly also gave Simba an antibiotic shot and sent Simba home with an E-collar on and three pre-drawn doses of pain medication. At 4:57 p.m. I picked Simba up from Kelly Veterinary Clinic and received documentation of what Dr. Kelly had done, post-surgery care instructions, Simba's pain medication, and Simba's testicles. Simba was then released into my care (Figure 7).

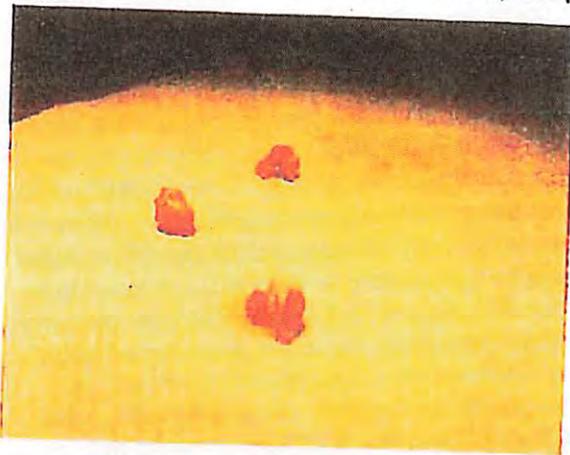


Figure 1a. All three pieces that Dr. Zepeckl cut out of Simba.



Figure 1b. Close-up image of one of the pieces Dr. Zepeckl cut out of Simba.

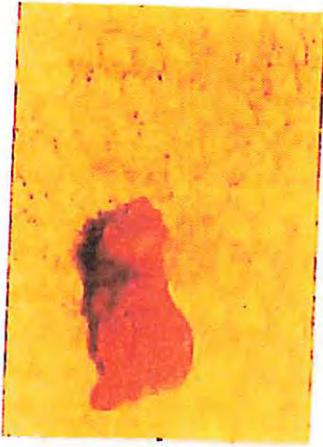


Figure 1c. Close up picture of the second piece Dr. Zepecki cut out of Simba.



Figure 2. Simba's anus post-surgery at Dr. Zepecki's clinic.

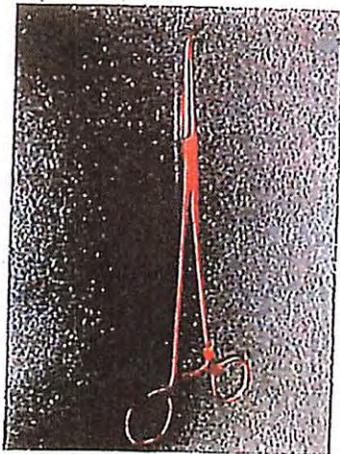


Figure 3. The Instrument Dr. Zepeckl Inserted Into Simba's "anus" post-surgery after failing to find feces on the tip of the thermometer.



Figure 4. Simba's "anus" 48 hours post-surgery at Dr. Zepeckl's clinic.



Figure 5a. Simba's anus after the first set of stitches being removed at Dr. Kelly's clinic.





Figure 7. Simbà's Incision area after being re-sutured by Dr. Kelly.

**Village Pet Services**

4147 Hwy 7 N.  
Hot Springs, AR 71909  
501-825-8416

**Patient Chart**

Printed: 05-20-20 at 7:47a

CLIENT INFORMATION

Name Ms. Alyssa Easterling (9224)  
Address 2807 Hot Springs Hwy  
Benton, AR 72010

Significant Other Austin Jordan

PATIENT INFORMATION

Name	Simba	Species	Feline
Sex	Male, Neutered	Breed	Tabby
Birthday	03-08-20	Age	10w
ID		Rabies	
Color	Orange	Weight	0.00 lbs
Reminded	05-14-20	Codes	

Reminders for: Simba

Last done

03/21	Rabies, Feline Rabdomunb-1
08/20	Feline Leukemia Annual
08/20	FVR-CP Annual
08/20	Feline Annual

MEDICAL HISTORY

Date	By	Code	Description	Qty (Variance)	Photo
04-28-20	RZ	D022842 OC124 D028542	Blue Dot Pan Starter Kit Lg Blue Cat Teaser Wand Aspen Pet Bed Round Sculptured		
04-28-20	RZ	08815028 LVCLR	Profender Feline cat dewormer small Pro Plan LiveClear chicken 3.5lb	2	
04-30-20	RZ	128 00118	Feline FVR-CP (1st) Nobivac FVR-CP/ Expires: 10-07-18 Type: MLV	1.00	Mfg: NOBIV Admin: SC
ID:	Items used: Serial: 02081307B	13741 130	Bio-Hazard Fee Feline Leukemia (1st) Nobivac Feline Leukemia Expires: 10-07-18 Type: KV	1.00	Mfg: NOBIV Admin: SC
ID:	Serial: 02081307B	13741	Bio-Hazard Fee		
05-14-20	RZ	124 00118	Feline FVR-CP (2nd) Nobivac FVR-CP/ Expires: 10-07-18 Type: MLV	1.00	Mfg: NOBIV Admin: SC
ID:	Items used: Serial: 02081307B	13741 131	Bio-Hazard Fee Feline Leukemia (2nd) Nobivac Feline Leukemia Expires: 10-07-18 Type: KV	1.00	Mfg: NOBIV Admin: SC
ID:	Serial: 02081307B	LEUVAC			

Village Pet Services  
 4147 Hwy 7 N.  
 Hot Springs, AR 71909  
 501-826-8418

Patient Chart for Simba  
 Date: 05-20-20, Time: 7:47a

Client: Ms. Alyssa Easterling

Page: 2

Date	By	Code	Description	Qty (Variance)	Photo
05-14-20	RZ	13741 03616028	Bio-Hazard Fee Profender Feline cat dewormer small		
05-16-20	RZ	.387 309 610 302A 0.2 0.2 10mg/ml	Declaw Feline, Ketamine/Acepromazine IM Feline Ketamine Acepromazine inj. 10mg/ml	1.00 1.00	
	Items used:				
	Ketamine				
	Acepromazine				
	Penicillin	13741 0714	Bio-Hazard Fee Pain and infection prevention		
	Dox	0.1 300,000units/ml			
	B12	0.1 2mg/ml 0.1 3000mcg/ml			
		13741 1377 334	Bio-Hazard Fee Scalpel Blade #10 Neuter male cat		



Asa Hutchinson  
Governor.

# ARKANSAS DEPARTMENT OF AGRICULTURE

1 Natural Resources Drive, Little Rock, AR 72205  
agriculture.arkansas.gov  
(501) 225-1598



Wes Ward  
Secretary of Agriculture

June 10, 2020

Robert Zepecki, DVM  
4147 Hwy 7 N  
Hot Springs Village, AR 71909

Dear Dr. Zepecki,

The Arkansas Veterinary Medical Examining Board (Board) has received a complaint from Ms. Alyssa Easterling against a veterinarian who provided care for her cat, Simba. According to the complaint, you were the veterinarian who provided veterinary services to Simba.

It is Board policy to obtain a reply to every complaint filed in its office; therefore, please find enclosed an Official Answer Form. Please outline, in detail, your treatment of Simba and submit copies of the written and computerized medical records, test charts and billing statements. If applicable, please also provide controlled substance logs and/or radiographs.

Your reply is due within two weeks of your receipt of this letter. Please submit ALL information that you wish the Board to consider regarding this complaint.

Sincerely,

Cara Tharp, Director  
Veterinary Medical Examining Board  
Direct: (501) 224-2836

Enclosures: Answer Form  
Pamphlet  
Copy of Complaint

EXHIBIT 7

STATE OF ARKANSAS  
 VETERINARY MEDICAL EXAMINING BOARD  
 #1 NATURAL RESOURCES DRIVE  
 P. O. BOX 8505  
 LITTLE ROCK, AR 72215  
 (501) 224-2836

OFFICIAL ANSWER FORM

Act 650 of 1975 was enacted as an exercise of the police powers of the State of Arkansas to promote the public health, safety, and welfare by safeguarding the people of the State against incompetent, dishonest, or unprincipled practitioners of veterinary medicine. It was declared that the right to practice veterinary medicine is a privilege conferred by legislative grant to persons possessed of the personal and professional qualifications specified in the Arkansas Veterinary Medical Practice Act.

It is the policy of this Board to obtain a reply to every filed complaint. Both the complaint and answer will be reviewed by the Board's Complaint Committee, and a recommendation will be made to the full Board on how to proceed (i.e. dismissal, case review or formal hearing).

Name of Licensee or Individual			Name of Complainant		
Robert Zepecki, DVM			Alyssa Easterling		
Address	City	Zip	Address	City	Zip
4147 Hwy 7N	Hot Springs, AR	71909	2907 Hot Springs Hwy	Benton	72019
Name of Clinic		Phone	Home Phone	Business Phone	
Village Animal Group		501 625 3418	501 722 7363		

INSTRUCTIONS for answering a complaint:

1. Type or print your response on a separate sheet of paper and attach it to this document.
2. State all facts briefly and clearly.
3. Give exact dates, if possible.
4. Veterinarians – enclose a copy of the patient's medical record (written and/or computer generated), billing record, radiographs and controlled drug log (if applicable).
5. Have form notarized and return it to the Board office.

(OVER)

RECEIVED  
 JUL 16 2020  
 BY: AT

Official Answer Form  
page #2

"I do solemnly swear or affirm that the information given in this affidavit is true, correct, and complete to the best of my knowledge. I hereby authorize the Arkansas Veterinary Medical Examining Board to verify any and all information contained in this affidavit. This affidavit and signature shall act as authorization of entities in possession of applicable information to release such information to the Arkansas Veterinary Medical Examining Board."

Rob D. Z. 6/24/2020  
(Signature of Respondent) (Date)

Subscribed and sworn before me this 24<sup>th</sup> day of June, 2020.

[Signature]  
(Signature of Notary Public)

My commission expires: 03/24/2029



(SEAL)

LIST NAMES OF PERSONS WHO CAN CONFIRM ALL OR PART OF YOUR ENCLOSED STATEMENTS:

NAME	ADDRESS	CITY	ZIP	PHONE
<u>Cosette Hooper</u>	<u>110 Colt St</u>	<u>Hot Springs</u>	<u>71913</u>	<u>918-505-5473</u>

**NOTICE:** Any and all complaints within the jurisdiction of the Board must be in writing, signed and dated by the complainant, and notarized (except complaints filed on the Board's own motion). The Board, upon receiving such complaint, may proceed to investigate said complaint and may take statements from any person thought to have knowledge of any fact(s) pertaining thereto.

**Response to Complaint from Alyssa Easterling**

I have read this complaint from a vindictive future veterinary student and my old nemesis, Dr Kelly. Despite the photos taken later the first photo from my clinic (without my permission or knowledge) shows both testes and a small piece of tissue from the vestibule. The post pictures show the anus intact. This is a complete fabrication by Dr Kelly. We did not keep the testes after the surgery. There were two. I don't think the cat has four. I offered to suture the lesion in the ventral aspect of the vestibule. The words of the complainant indicates that the rectum and anus were complete and intact. This is the future of veterinary medicine. I would ask that the dna of the sample dr Kelly has evidently kept be analyzed if this goes any further.

Ms Easterling continued to work here with no indication of any problems. She assured me on a daily basis that everything was ok with Simba. I never saw the cat after the surgery. She insisted on Mrs Hooper suturing the area where the vertical incisions were located post removal of the testes without my approval. I would ask that the documents from Kelly vet clinic be obtained for the board and my attorneys review. This might be the one time when I can take action both through the Board and in a court of law.

I cannot comment on the medical state of Simba and would ask that a statement and photos of simba now would be provided by Ms Easterling. She gave us no indication of any of this. Continued to work here and then abruptly left without telling us. I believe that this is simply an attempt by dr Kelly to discredit me. I have had very close relations with Ms Easterlings family for several years and have done some difficult surgeries on their lab when nobody else would agree. I wrote a letter of recommendation for Ms Easterling to several vet schools. I am greatly dismayed that dr Kelly has attempted to discredit me again. There is a pattern of deceit that requires action by the Board. I will take my own civil action on this matter at a later date.

Upon further examination of the photos provided by Ms Easterling and Dr Kelly there are some matters that need to be further reviewed. You will note that there are two very small testes in the first pictures from both Ms Easterling and my tech Cassie Hooper. They are identical and were taken simultaneously. The formalin jar sample provided by Dr Kelly is far too large to be testicles from this very small cat. I believe that she has provided fraudulent information and evidence. The rectum was intact on this kitten. A small fistula in the vaginal vault was evident by my initial observation. I was not allowed to close it. Dr Kelly produced fraudulent evidence against me with a client in 2004 that led to years of legal actions on my part that eventually exonerated me. She submitted a faxed euthanasia permission that was photocopied over the signature of Mrs Hadley at that time. She also falsified information about that animal that died in her clinic unsupervised and lied to the owner Mrs. Hadley. There is a pattern of deceit and fraud by Dr Kelly that should be further investigated.

  
Robert G Zepeckl DVM

**ARKANSAS NOTARY ACKNOWLEDGEMENT  
(INDIVIDUAL)**

State of Arkansas  
County of Garland

On this 14<sup>th</sup> day of June, 2020, before me, Tyler A Sellers, a Notary Public, (or before any officer within this State or without the State now qualified under existing law to take acknowledgments), appeared the within named Robert Travis W. (and N/A), to me personally well known (or satisfactorily proven to be such person), who stated and acknowledged that [he, she or they] had so signed, executed and delivered said foregoing instrument for the consideration, uses and purposes therein mentioned and set forth.

IN TESTIMONY WHEREOF, I have hereunto set my hand and official seal this 14<sup>th</sup> day of June, 2020.

Tyler A Sellers  
Signature of Notary Public

My Commission Expires: 08/24/2029



(Seal)

RE: Easterling v. Zepecki, DVM

I am writing you today in effort to elucidate and rectify the above complaint. On the morning of May 15, 2020, I was present during the surgical procedure (Neuter and Declaw) of Simba Easterling. During the procedure Dr. Zepecki made two vertical incisions along the scrotum using a #10 surgical blade. Testicles were removed in routine fashion and ligated with their own tissue, as I have seen Dr. Zepecki do hundreds of times with no complications. Immediately after Dr. Zepecki moved on to the declaw which was done in a routine fashion as well with no complications. Ms. Easterling was adamant that I suture the incisions, which I reluctantly did per her request. It states in Miss Easterling complaint that I contacted Kelly Veterinary Clinic this claim is false and backed with no evidence to prove otherwise.

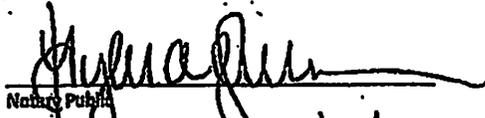
As for the photos provided by Ms. Easterling, specifically figures 1a, 1b, and 1c, these images were taken moments after I imaged the figures in question. In the image I took, which can be noted below, you can clearly see that these so-called pieces are more accurately defined as two testicles and a piece of tissue, which were obtained with no complications by Dr. Zepecki.

Please do not hesitate to contact me with any questions or concerns



Cassie Hooper  
Veterinary Assistant  
Village Animal Group, Inc.

Subscribed and sworn before me this 26<sup>th</sup> day of June, 2020



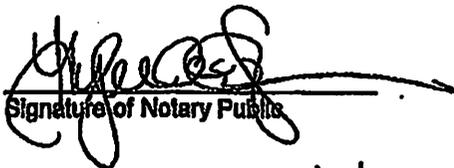
Notary Public

My commission expires: 03/24/2024

ARKANSAS NOTARIAL CERTIFICATE  
(JURAT)

State of Arkansas  
County of Garland

Subscribed and sworn to before me on this 26<sup>th</sup> day of June, 2020.

  
Signature of Notary Public

(Seal)

My Commission Expires: 02/24/2021



# Village Pet Services

# Patient Chart

4147 Hwy 7 N.  
Hot Springs, AR 71809  
601-626-3418

Printed: 08-26-20 at 2:41p

### CLIENT INFORMATION

Name Ms. Alyssa Easterling (9224)  
Address 2807 Hot Springs Hwy  
Benton, AR 72018  
Phone 601 722-7383  
Significant Other Austin Jordan

### PATIENT INFORMATION

Name Simba  
Sex Male, Neutered  
Birthday 08-08-20  
ID  
Color Orange  
Reminded 08-16-20  
Species Feline  
Breed Tabby  
Age 15w  
Rabies  
Weight 2.12 lbs  
Codes

### MEDICAL HISTORY

Date	By	Code	Description	Qty (Variance)	Photo
08-20-20	RZ	61888D	Bravecto Feline 19.8 -27.6 lbs (3 mo.)	2	
		182681	Bravecto Feline 6.2- 19.8 lbs (3 mo.)	4	

08-16-20 RZ STAFF Staff Notes  
CH: 08-16-20 at 8:11a: Patient was presented to clinic for surgical procedure (Neuter, Declaw)  
patient is BAR, temp is 100.4

CH: 08-16-20 at 12:42p: Patient surgery went accordingly no complications patient is currently  
BAR. Two testicle was removed successfully with three nylon sutures added.

394 Neuter male cat  
1377 Scalpel Blade #10  
13741 Bio-Hazard Fee  
0714 Pain and infection prevention

CH: 08-16-20 at 8:42a: Done given IM

Pentothilin 0.1 300,000units/ml  
Dox 0.1 2mg/ml  
B12 0.1 3000mcg/ml

13741 Bio-Hazard Fee  
308 Ketamine/Acepromazine IM Feline

CH: 08-16-20 at 8:22a: Done given IM

Ketamine 0.2  
Acepromazine 0.2 10mg/ml

.367 Declaw Feline,

CH: 08-16-20 at 12:42p: Patient surgery went accordingly no complications patient is currently  
BAR: All ten claws was removed and accounted for.

Patient Chart for Simba  
Date: 08-28-20, Time: 2:41p

Client: Ms. Alyssa Easterling

Page: 2

Date	By	Code	Description	Qty (Variance)	Photo
05-14-20	RZ	03818028	Profender Feline cat dewormer small		
		13741	Bio-Hazard Fee		
		131	Feline Leukemia (2nd)		
		13741	Bio-Hazard Fee.		
04-30-20	RZ	124	Feline FVR-CP (2nd)		
		13741	Bio-Hazard Fee		
		130	Feline Leukemia (1st)		
		13741	Bio-Hazard Fee		
04-28-20	RZ	123	Feline FVR-CP (1st)		
		LVCLR	Pro Plan LiveClear chicken 3.5lb	2	
04-26-20	RZ	03818028	Profender Feline cat dewormer small		
		D028842	Aspen Pet Bed Round Sculptured		
		OC124	Cat Teaser Wand		
		D022842	Blue Cat Pan Starter Kit Lg Blue		

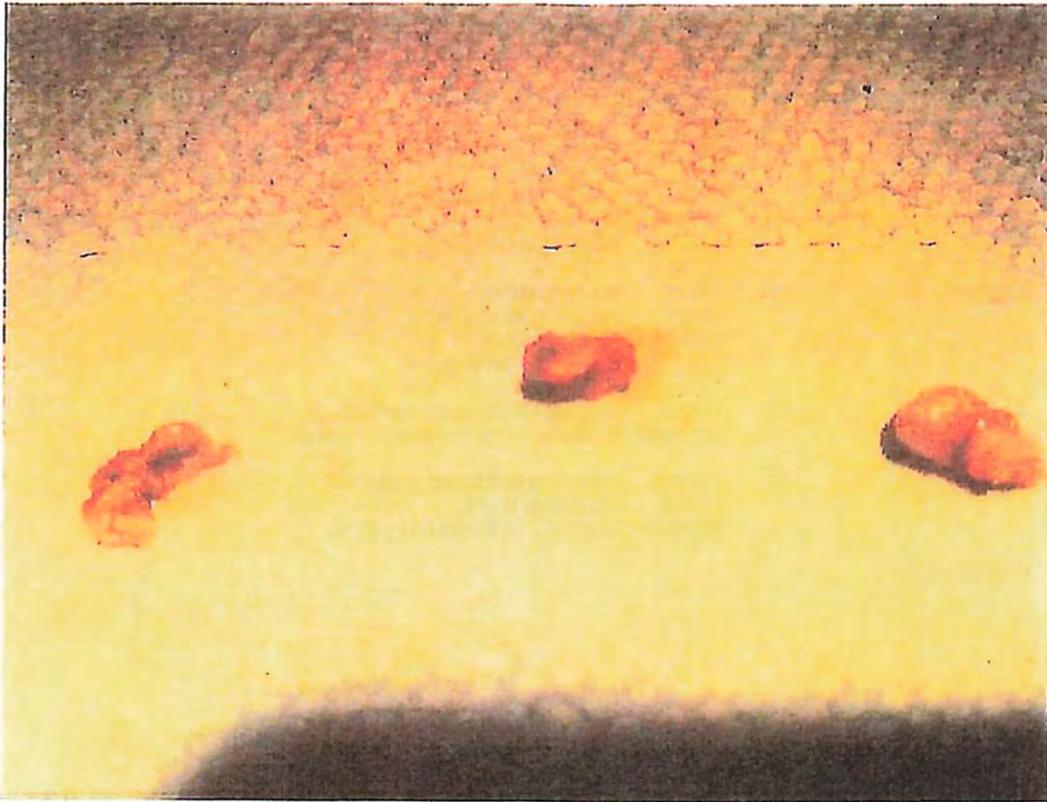


Image I obtained post op.

I verify the validity of this document.

Alan Wells

I verify I took this picture post op  
on the same cloth of the same tissues

AW

# ANIMAL RECORD

Owner's Name Justin Jordan Home Phone 870-518-1151  
 Address 2407 Hill - Palmis Hwy Work Phone \_\_\_\_\_  
 Animal's Name Sivvie Species Feline Breed Tabby  
 Sex M Age 1.5 Birth Date 3-1-20 Color & Markings Tabby Referred by \_\_\_\_\_

Rabies				FVR-CP	✓	✓		
DHLP				FelV	✓	✓		
Parvo				Chlamydia				
HIV				Rabies				
Lyme								
Corona				Dental				
Bordetella				Fecal				

Date	Weight	Treatment and Progress	Charge
11/11		Initial Exam	
2 <sup>nd</sup>		Exam	
10/4 <sup>th</sup>		<p>               Exam → Sedation (Rox)             </p> <p>               Quote given for sedation, explore +/- hernia             </p> <p>               are 2000 @ VPHOO.COM             </p> <p>               discussed that anal tone cannot be guaranteed. Cat             </p> <p>               large open (2nd) infected anal lesion leading             </p> <p>               from stricture through ventral canal sphincter             </p> <p>               kitten has recently been neutered and de-             </p> <p>               clawed per se, can palpate 2 pigtail lumps.             </p> <p>               0.05cc Ketamine 10.05cc dexmedetomidine 10.05cc Diprivan T100             </p> <p>               180/102 mmHg, humid and asymptotically prepped.             </p> <p>               wound between pigtales and anus. Removed             </p> <p>               2 clear sutures from previous procedure.             </p> <p>               large anal identified rectum. Could not identify             </p> <p>               anal glands, no attached skin to rectum, unable             </p> <p>               to identify anal sphincter muscle. Explored distal             </p> <p>               rectum and discovered fistula still present.             </p> <p>               Clamped and removed fistula and placed in formalin.             </p> <p>               cleaned all remainder of defect w/3-0 PDS, closed             </p> <p>               again and applied small amount Neosporin. E-collar             </p> <p>               10/12/2018 0.1cc Sulfis             </p>	

\* Sulfis 0.1cc q 12h, 10/12/2018. 0.1cc 10/12/2018. 0.1cc 10/12/2018.



# Kelly Veterinary Clinic

After Surgery...Do's & Don'ts for Simba  
(Animal's Name)

Your pet has had major surgery, to avoid complications, please observe the following rules: Keep your pet quiet for 10 days

1. NO jumping on & off furniture.
2. NO climbing up or down stairs.
3. NO running
4. NO swimming
5. NO long walks
6. NO bathing



### "DO'S"

- \* Do check your pet's incision line (stitches) daily for 5 days
- \* Do report any swelling or drainage
- \* Do keep bandages DRY. If the bandages do get WET, schedule an appointment immediately.

### "DON'Ts"

- \* Don't invite infection, keep bedding LEAN & DRY
- \* Don't allow your pet to lick or chew the stitches

### Confinement Instructions:

Keep your pet confined strictly to a cage or carrier just large enough to stand and turn around once in. Confinement should continue for a minimum of 7 days. Carry your pet to and from the yard to eliminate.

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- \* E-Collars are available here and require a \$30.00 deposit, \$10.00 of which is refundable if the collar is returned in good condition.

Feeding your pet very small amount of food and water will reduce the likelihood of vomiting. It's OKAY if your pet isn't hungry after surgery. After 24 hours regular feeding can resume.

\*\*\*\*\*  
If medication is needed, give as directed. MEDICATION:  YES  NO  
~~will need to be rechecked to have bandages removed on~~

~~After 7 days call the office for instructions on when your pet can resume normal activity. If sutures are removed your pet can be bathed, not before.~~  
Suture Removal Date: \_\_\_\_\_

remove sutures in 7-10 days

~~**De-Clawing:** If your cat was de-clawed please use lined paper instead of litter for 10 days. Litter can become embedded in the wound and cause infection.~~

If you have a problem don't hesitate to call, we are here to help: (501) 623-5781.

STATE OF ARKANSAS  
 VETERINARY MEDICAL EXAMINING BOARD  
 #1 NATURAL RESOURCES DRIVE  
 P. O. BOX 8505  
 LITTLE ROCK, AR 72215  
 (501) 224-2836

**OFFICIAL ANSWER FORM**

Act 650 of 1975 was enacted as an exercise of the police powers of the State of Arkansas to promote the public health, safety, and welfare by safeguarding the people of the State against incompetent, dishonest, or unprincipled practitioners of veterinary medicine. It was declared that the right to practice veterinary medicine is a privilege conferred by legislative grant to persons possessed of the personal and professional qualifications specified in the Arkansas Veterinary Medical Practice Act.

It is the policy of this Board to obtain a reply to every filed complaint. Both the complaint and answer will be reviewed by the Board's Complaint Committee, and a recommendation will be made to the full Board on how to proceed (i.e. dismissal, case review or formal hearing).

Name of Licensee or Individual			Name of Complainant		
Robert Zepecki, DVM			Alyssa Easterling		
Address	City	Zip	Address	City	Zip
4147 Hwy 7N	Hot Springs, AR	71909	2907 Hot Springs Hwy	Benton	72019
Name of Clinic		Phone	Home Phone	Business Phone	
Village Animal Group		501 625 3418	501 722 7363		

**INSTRUCTIONS for answering a complaint:**

1. Type or print your response on a separate sheet of paper and attach it to this document.
2. State all facts briefly and clearly.
3. Give exact dates, if possible.
4. Veterinarians – enclose a copy of the patient's medical record (written and/or computer generated), billing record, radiographs and controlled drug log (if applicable).
5. Have form notarized and return it to the Board office.

(OVER)

RECEIVED  
 JUL 06 2020  
 BY: *AT*

Official Answer Form  
page #2

"I do solemnly swear or affirm that the information given in this affidavit is true, correct, and complete to the best of my knowledge. I hereby authorize the Arkansas Veterinary Medical Examining Board to verify any and all information contained in this affidavit. This affidavit and signature shall act as authorization of entities in possession of applicable information to release such information to the Arkansas Veterinary Medical Examining Board."

Robert D. Z... 6/24/2020  
(Signature of Respondent) (Date)

Subscribed and sworn before me this 24<sup>th</sup> day of June, 2020.

[Signature]  
(Signature of Notary Public)

My commission expires: 03/24/2029



(SEAL)

LIST NAMES OF PERSONS WHO CAN CONFIRM ALL OR PART OF YOUR ENCLOSED STATEMENTS: 918-905-8473

NAME	ADDRESS	CITY	ZIP	PHONE
<u>Cosette Hoover</u>	<u>110 Colt Dr</u>	<u>Hot Springs</u>	<u>71913</u>	

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I cannot comment on the medical state of Simba and would ask that a statement and photos of Simba now would be provided by Ms Easterling. She gave us no indication of any of this. Continued to work here and then abruptly left without telling us. I believe that this is simply an attempt by dr Kelly to discredit me. I have had very close relations with Ms Easterlings family for several years and have done some difficult surgeries on their lab when nobody else would agree. I wrote a letter of recommendation for Ms Easterling to several vet schools. I am greatly dismayed that dr Kelly has attempted to discredit me again. There is a pattern of deceit that requires action by the Board. I will take my own civil action on this matter at a later date.

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Robert G Zepecki DVM

**ARKANSAS NOTARY ACKNOWLEDGEMENT  
(INDIVIDUAL)**

State of Arkansas  
County of Garland

On this 14<sup>th</sup> day of June, 2020, before me, Tyler A Sellers, a Notary Public, (or before any officer within this State or without the State now qualified under existing law to take acknowledgments), appeared the within named Robert Taylor (and N/A), to me personally well known (or satisfactorily proven to be such person), who stated and acknowledged that [he, she or they] had so signed, executed and delivered said foregoing instrument for the consideration, uses and purposes therein mentioned and set forth.

IN TESTIMONY WHEREOF, I have hereunto set my hand and official seal this 14<sup>th</sup> day of June, 2020.

Tyler A Sellers  
Signature of Notary Public



(Seal)

My Commission Expires: 08/24/2029

RE: Easterling v. Zepecki, DVM

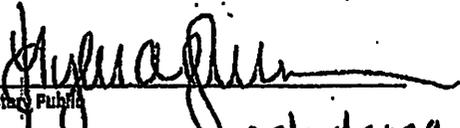
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As for the photos provided by Ms. Easterling, specifically figures 1a, 1b, and 1c, these images were taken moments after I imaged the figures in question. In the image I took, which can be noted below, you can clearly see that these so-called pieces are more accurately defined as two testicles and a piece of tissue, which were obtained with no complications by Dr. Zepecki.

Please do not hesitate to contact me with any questions or concerns

  
Cassie Hooper  
Veterinary Assistant  
Village Animal Group, Inc.

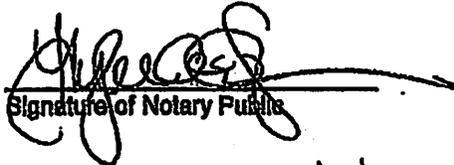
Subscribed and sworn before me this 26<sup>th</sup> day of June, 2020

  
Notary Public  
My commission expires: 03/24/2024

**ARKANSAS NOTARIAL CERTIFICATE  
(JURAT)**

State of Arkansas  
County of Garland

Subscribed and sworn to before me on this 26<sup>th</sup> day of June, 2020.

  
Signature of Notary Public

(Seal)

My Commission Expires: 02/24/2029



**Village Pet Services**

**Patient Chart**

4147 Hwy 7 N.  
Hot Springs, AR 71909  
601-626-3418

Printed: 06-26-20 at 2:41p

CLIENT INFORMATION

Name Ms. Alyssa Easterling (8224)  
Address 2807 Hot Springs Hwy  
Benton, AR 72019  
Phone 601 722-7363

Significant Other Austin Jordan

PATIENT INFORMATION

Name	Simba	Species	Feline
Sex	Male, Neutered	Breed	Tabby
Birthday	09-08-20	Age	16w
ID		Rabies	
Color	Orange	Weight	2.12 lbs
Reminded	09-16-20	Gender	

MEDICAL HISTORY

Date	By	Code	Description	Qty (Variance)	Photo
08-20-20	RZ	61888D	Bravecto Feline 13.8 -27.5 lbs (3 mo.)	2	
		182881	Bravecto Feline 6.2- 13.6 lbs (3 mo.)	4	

05-16-20 RZ STAFF Staff Notes  
CH: 05-16-20 at 8:11a: Patient was presented to clinic for surgical procedure (Neuter, Declaw)  
patient is BAR, temp is 100.4

CH: 05-16-20 at 12:42p: Patient surgery went accordingly no complications patient is currently  
BAR. Two testicle was removed successfully with three nylon sutures added.

- 334 Neuter male cat
- 1977 Scalpel Blade #10
- 13741 Bio-Hazard Fee
- 0714 Pain and infection prevention

CH: 05-16-20 at 8:42a: Done given IM

Penicillin 0.1 300,000units/ml  
Dax 0.1 2mg/ml  
B12 0.1 3000mcg/ml

- 13741 Bio-Hazard Fee
- 308 Ketamine/Acepromazine IM Feline

CH: 05-16-20 at 8:22a: Done given IM

Ketamine 0.2  
Acepromazine 0.2 10mg/ml

- .367 Declaw Feline,

CH: 05-16-20 at 12:42p: Patient surgery went accordingly no complications patient is currently  
BAR: All ten claws was removed and accounted for.

Patient Chart for Simba  
Date: 06-26-20, Time: 2:41p

Client: Ms. Alyssa Easterling

Page: 2

Date	By	Code	Description	Qty (Variance)	Photo
06-14-20	RZ	09618026 13741 131 13741 124	Profender Feline cat dewormer small Bio-Hazard Fee Feline Leukemia (2nd) Bio-Hazard Fee Feline FVR-CP (2nd)		
04-30-20	RZ	13741 130 13741 123	Bio-Hazard Fee Feline Leukemia (1st) Bio-Hazard Fee Feline FVR-CP (1st)		
04-28-20	RZ	LVCLR 08616026	Pro Plan LiveClear chicken 3.5lb Profender Feline cat dewormer small	2	
04-28-20	RZ	D028642 OC124 D022842	Aspen Pet Bed Round Sculptured Cat Teaser Wand Blue Cat Pan Starter Kit Lg Blue		



# ANIMAL RECORD

Owner's Name Justin Jordan Home Phone 870.518.1151  
 Address 2467 Hill Springs Hwy Work Phone \_\_\_\_\_  
 Animal's Name Symba Species Feline Breed Tabby  
 Sex M Age 11 Birth Date 3-2-20 Color & Markings T.M.N.S.F. Referred by \_\_\_\_\_

Rabies					FVR-CP	✓	✓		
DHLP					FelV	✓	✓		
Parvo					Chlamydia				
HIV					Rabies				
Lyme									
Corona					Dental				
Bordetella					Fecal				

Date	Weight	Treatment and Progress	Charge
11/17		Initial exam, FVR-CP, FelV, Chlamydia, Rabies, Dental, Fecal.	
2 <sup>nd</sup>		Exam, FVR-CP, FelV, Chlamydia, Rabies, Dental, Fecal.	
10/20		Exam → Sedation, consult Quote owner for sedation, explore +/- hernia Afe. 2000 @ VMD. COM Discussed that anal tone cannot be guaranteed. Cat large area (2cm) infected skin leading from scrotum through ventral anal sphincter kitten has recently been neutered and de- clawed per 11, can palpate 2 pigtail lumps. 0.05cc Ketamine 10.05cc dexmedetomidine 10.05cc Dipriven 1ml 150/107 mass, shaved and aseptically prepared. wound between pigtail and anus. Removed 2 clear sutures from perianal area, placed wound layers and identified rectum. Could not identify anal glands, no attached skin to rectum, unable to identify anal sphincter muscle. Explored scrotal remnants and discovered testicles still present. Clamped and removed testicles and placed in formalin. Clamped and removed 1/3 of PDS, cleaned EXHIBIT 6 again and applied small amount Neosporin. E-collar 10/20/2011 0.1cc Skiba 0.1cc Icarax 0.01cc Skiba	

\* Sutures removed on 11-10-11. S. 1500 BAC (out of 1000) 0.05cc (1000)



# Kelly Veterinary Clinic

After Surgery...Do's & Don'ts for Simba  
(Animal's Name)

Your pet has had major surgery, to avoid complications, please observe the following rules: Keep your pet quiet for 10 days

1. NO jumping on & off furniture.
2. NO climbing up or down stairs.
3. NO running
4. NO swimming
5. NO long walks
6. NO bathing



### "DO'S"

- \* Do check your pet's incision line (stitches) daily for 5 days
- \* Do report any swelling or drainage
- \* Do keep bandages DRY. If the bandages do get WET, schedule an appointment immediately.

### "DON'Ts"

- \* Don't invite infection, keep bedding LEAN & DRY
- \* Don't allow your pet to lick or chew the stitches

### Confinement Instructions:

Keep your pet confined strictly to a cage or carrier just large enough to stand and turn around once in. Confinement should continue for a minimum of 7 days. Carry your pet to and from the yard to eliminate.

Your pet has INTERNAL, dissolvable stitches, followed by the outer skin conjoined by either surgical adhesive, external stitches or staples. If your pet removes the external stitches, staples or surgical adhesive you MUST prevent them from removing the INTERNAL stitches or they may risk serious complications. It may be necessary for your pet to wear an E-Collar.

- \* E-Collars are available here and require a \$30.00 deposit, \$10.00 of which is refundable if the collar is returned in good condition.

Feeding your pet very small amount of food and water will reduce the likelihood of vomiting. It's OKAY if your pet isn't hungry after surgery. After 24 hours regular feeding can resume.

If medication is needed, give as directed. MEDICATION:  YES  NO  
~~will need to be rechecked to have bandages removed on~~

~~After 7 days call the office for suture removal. Normal activity can resume. If bandages are removed your pet can be bathed, not before.~~  
Suture Removal Date: \_\_\_\_\_

remove sutures in 7-10 days

~~De-Clawing: If your cat was de-clawed please use lined paper instead of carpet for 10-14 days. Litter can be used on hard floors and in a litter box.~~

If you have a problem don't hesitate to call, we are here to help: (501) 623-5781.



- Asa Hutchinson  
Governor

## ARKANSAS DEPARTMENT OF AGRICULTURE

1 Natural Resources Drive, Little Rock, AR 72205  
agriculture.arkansas.gov  
(501) 225-1598



Wes Ward  
Secretary of Agriculture

October 20, 2020

Robert Zepecki, DVM  
4147 Hwy 7 N  
Hot Springs Village, AR 71909

Re: Docket No. 2020-04

Dear Dr. Zepecki,

After reviewing the above referenced complaint filed against you by Ms. Alyssa Easterling, the Complaint Committee needs to gather some additional information from you regarding the case. Please answer the following questions:

1. Are there any medical records that were not provided that include a complete physical exam of all systems and a TPR?
2. Did you obtain any pre-surgical consent forms?
3. Do you normally suture your cat neuters? If not, why was this one sutured?
4. Why did the area need to be held with gauze and clot powder?
5. Instead of the instructions being given by you, why was Ms. Cassie Hooper given instructions by another veterinary assistant to suture the area on the cat?
6. Why did you leave the surgery room?
7. Why was a long pair of hemostats inserted into the rectum when a thermometer would not go in?
8. You stated in your response that the three (3) pieces shown in the picture taken by Ms. Hooper were both testes and a small piece of tissue from the vestibula. You also stated that a small fistula in the vaginal vault was evident in your initial observation, but that you were not allowed to close it. Since this was a male cat, please explain your findings of a vestibule and a vaginal vault.
9. Please identify each individual piece of tissue that you removed from the cat.
10. Why is Ms. Hooper listed on your website as a veterinary technician when she is not certified by the Board?

**EXHIBIT 9**

Please submit your answers to these questions in writing no later than Friday, October 30, 2020. Thank you for your cooperation in this matter.

Sincerely,



Cara Tharp, Director  
Veterinary Medical Examining Board  
Direct: (501) 224-2836

EE 8040 7529 0027 6257 0408 33



Brad Hendricks ††  
Lamar Porter †  
Christopher R. Heil  
David Ruwls †  
George R. Wise, Jr.

All Licensed in Arkansas  
† Also Licensed in Texas  
†† Also Licensed in Texas & Missouri  
‡ Also Licensed in Louisiana

**THE BRAD HENDRICKS  
LAW FIRM**  
A Professional Association

500 C Pleasant Valley Drive  
Little Rock, Arkansas 72227  
Telephone: (501) 221-0444  
Fax: (501) 661-0196

[www.bradhendricks.com](http://www.bradhendricks.com)

October 29, 2020

Matthew E. Hartness †  
Caroline C. Lewis  
Lloyd W. "Tre" Kitchens  
Sheldon D. Smith  
Edward T. Ogelsby †  
Gary Davis †

† Of Counsel

Via Facsimile: (501) 224-1100

State of Arkansas  
Veterinary Medical Examining Board  
Attn: Cara Sharp  
#1 Natural Resources Drive  
P.O. Box 8505  
Little Rock, AR 72215

RE: *Easterling Complaint Against Robert Zepecki*

Dear Ms. Sharp:

Our office has been retained by Dr. Robert Zepecki in the above referenced matter. It is our understanding that Dr. Zepecki has previously submitted his written response to the Complaint to your office, and your office has recently requested additional information from him. Attached please find Dr. Zepecki's responses to the follow-up questions. Should further information be needed, please do not hesitate to contact our office.

Thank you for your assistance in this matter. Should you have any questions, please do not hesitate to contact me at (800) 603-5100.

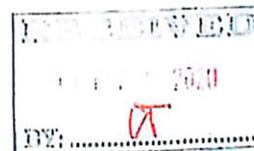
Sincerely,

*/s/ Lloyd W. "Tre" Kitchens*

Lloyd W. "Tre" Kitchens  
[lkitchens@bradhendricks.com](mailto:lkitchens@bradhendricks.com)

LWK/sh  
Enclosures

cc: client and  
Alyssa Easterling  
2907 Hot Springs Hwy.  
Benton, AR 72019





4147 North Highway 7  
Hot Springs Village, AR 71909  
Clinic: (501)625-3418  
Emergency: (501)626-0237  
robertzepeckl@gmail.com

Ms. Cassie Hooper  
All Pet Center  
4147 N Hwy 7  
Hot Springs, AR 71909  
Tuesday, October 27, 2020

Ms. Cara Tharp  
Veterinary Medical Examining Board  
1 Natural Resources Drive  
P.O. Box 8505  
Little Rock, AR 72215

Ms. Tharp,

At the request of the Veterinary Medical Examining Board I am providing an additional response to you in regards to Docket 2020-04.

Q1: Are there any medical records that were not provided that include a complete physical exam of all systems and a TPR?

A1: Please see attached documentation.

Q2: Did you obtain any pre-surgical consent forms?

A2: As previously stated in Ms. Easterling's complaint, "Dr. Zepeckl was given consent to de-claw and neuter Simba." Per bookkeeping and liability protocols, Ms. Easterling was required to sign a surgical consent just as any client would be before any form of treatment. At that time, she consented a de-claw and neuter her kitten.

Q4: Why did the area need to be held with gauze and clot powder?

A4: With any routine procedure at our clinic we find it to be a critical part of our treatment process to place a nitrofurazone powder to the site of any incision to prevent any potential infection and clot any bleeding that may or may not occur post op. This is a routine surgical protocol that our clinic has utilized for many years and was done simply for this reason only.



4147 North Highway 7  
Hot Springs Village, AR 71909  
Clinic: (501)625-9418  
Emergency: (501)626-0237  
robertzepeckl@gmail.com

**Q5: Instead of instructions given by you (Dr. Zepeckl), why was Ms. Cassie Hooper given instructions by another veterinary assistant to suture the area of the cat?**

**A5: Answering this question is simple and straightforward. As you all know, placing suture in a feline neuter is not necessary as the incision heals quickly with no infection or complications. Following the procedure, Dr. Zepeckl offered to suture the incision merely for Ms. Easterling's peace of mind. After her denial of this Dr. Zepeckl had then concluded his procedure and instructed us to move Simba into recovery for post op observation. Dr. Zepeckl scrubbed out and returned to his office down the hall to chart his surgical encounter, where he was available at any time. It was at this point that Ms. Easterling, as she stated, "... forced [me] to try and close up the area as well as possible." I expressed my concerns about suturing an incision without Dr. Zepeckl's knowledge; however, she became violently adamant about the situation and twisted my hand to suture her kitten. This was all done without Dr. Zepeckl's knowledge nor his consent. Dr. Zepeckl tried to conclude a post op exam on Ms. Easterling's kitten, but was not allowed to by Ms. Easterling.**

**Q6: Why did you (Dr. Zepeckl) leave the surgery room?**

**A6: As previously answered in Q5, Dr. Zepeckl only left the surgical suite after the procedure was concluded and he had instructed placement of the patient in a post op kennel for observation before scrubbing out and leaving the room. It was at this time that Ms. Easterling removed Simba from post-op observation and demanded suturing the kitten.**

**Q10: Why is Ms. Hooper listed on your website as a veterinary technician when she is not certified by the Board?**

**A10: I received my CVA license from Petra Allied Health in 2018. Our website is a typo due to our website management being outsourced, and is in no shape or form an attempt for false advertisement. We have sent a request to have this modified.**

**I will be happy to any further questions or additional information needed in regards to this matter.**

Sincerely,

A handwritten signature in black ink that reads "Cassie Hooper". The signature is written in a cursive, somewhat stylized font.

Ms. Cassie Hooper



4147 North Highway 7  
 Hot Springs Village, AR 71909  
 Clinic: (501)625-3418  
 Emergency: (501)626-0237  
 robertzepeckl@gmail.com

Subscribed and sworn before me this 29th day of October, 2020

[Signature]  
 Notary Public

My Commission Expires: 03/24/2029





Tyler Sellers  
Hospital Administrator  
All Pet Center Animal Hospital & Emergency Clinic  
4147 Highway 7 North  
Hot Springs Village, AR 71909  
501-418-3041  
admin@hotspringsvillagevets.com

01/06/2024

Arkansas Veterinary Medical Examining Board  
Arkansas Department of Agriculture  
1 Natural Resources Drive  
Little Rock, AR 72205

**Subject:** Submission of Requested Documentation

Dear Members of the Arkansas Veterinary Medical Examining Board,

I am writing to confirm the submission of the requested documentation as part of the requirements communicated to me. Enclosed, you will find the following:

1. Continuing Education (CE) Records from 2022 to 2024.
2. Copies of six randomly selected patient records as per your request.
3. A check for \$2,500, made payable to the Arkansas Department of Agriculture, with the memo line noted as FBO: Veterinary Scholarship Fund.

Please do not hesitate to contact me if additional information or clarification is required. I appreciate your time and assistance in reviewing these materials.

Thank you for your attention to this matter.

Sincerely,

Tyler A. Sellers  
Hospital Administrator  
All Pet Center Animal Hospital & Emergency Clinic



THIS DOCUMENT HAS A COLORED BACKGROUND AND HIGH RESOLUTION BORDER. THE REVERSE SIDE OF THIS DOCUMENT HAS AN ARTIFICIAL WATERMARK.

Village Pet Services, Inc.  
4147 North Highway 7  
Hot Springs Village, AR 71909  
(501) 625-3418

Chambers Bank  
901 Main Street  
Danville, AR 72833  
(479) 495-2236

2466

PAY TO  
THE ORDER  
OF

Arkansas Department of Agriculture

/

Date  
\$

01/06/2025

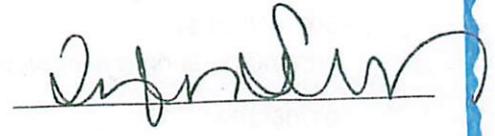
\*\*2,500.00

DOLLARS

TWO-THOUSAND FIVE-HUNDRED AND 00/100\*\*\*\*\*

Arkansas Department of Agriculture  
1 Natural Resources Drive  
Little Rock, AR 72205

FBO: Veterinary Scholarship Fund





# Certificate of Continuing Education Credit

Awarded to: robert zepecki

State of Licensure:

License Number:

For attending:

Pricing in Veterinary Clinics

RACE # 20-1035624

Presenter: Paul Dunn and Paolo Lencioni

Date Completed: 12/13/2024

Location: Video

Subject/Category: Non-Scientific, Pract. Mgmt, Prof. Dev.

Method of Delivery: Non-Interactive Distance

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

© 2024 IDEXX Laboratories. All rights reserved. AAVSB RACE Provider # 50-26369

# VET SHOW

## CE Certificate of Attendance

This is to certify that: Robert

License #:

State:

Has completed the following continuing education live webinar

**Practical Small Animal Ultrasound:**

**4 Cases Where POCUS Enhanced Gastrointestinal Disease Management**

Date: September 29, 2023

CE hours: 1.00

Signature: .....

Authorized Signature:



April Walsh  
Vice President  
CloserStill Vet US





## CE CERTIFICATE OF ATTENDANCE

AWARDED TO:

**Robert Zepecki**

State of Licensure: ARKANSAS

License Number: 1424

### Efficacious Use of Acid Suppressants in General Practice

Presented By: Dr. Emily Gould DVM, MS, DACVIM (SAIM), PhD

Date of Completion: February 21, 2024



This program (20-1008786) was reviewed and approved by the AAVSB RACE program to offer a total of 1:00 CE Credits (1.00 max) being available to veterinarians. This RACE approval is for the subject matter categories of Medical Program, 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.



Memphis/Shelby County  
Veterinary Medical Association

Memphis/Shelby County Veterinary Medical Association  
23rd Annual Mid-South Regional Conference, Olive Branch, MS  
November 16, 2023

Thursday, November 16, 2023

4:00 - 6:00 p.m.

Ralph C. Harvey, DVM, MS, Diplomate  
Osteoarthritis (OA) in Dogs & Cats  
Anesthesia & Pain Management

Bob 2 Hours

7:00 to 9:00 p.m.

Terry Lynn Stevens, Pharm.D  
DEA Requirements  
Documentation for DVM's

Bob 2 Hours

Dr. / LVMT Richard has successfully completed

4 Hours of Continuing Education

\_\_\_\_\_  
Lee M. Hughes, MSCVMA Executive Director

Approved by Tennessee Board of Veterinary Medical Examiners



**Memphis/Shelby County  
Veterinary Medical Association**

**Memphis/Shelby County Veterinary Medical Association  
23<sup>rd</sup> Annual Mid-South Regional Conference, Olive Branch, MS  
November 17, 2023**

**Friday, November 17, 2023**

**6:00 am – Noon**

**Louise Dunn, CEO/Owner**

**What Job Candidates Really Want**

**Reskilling & Upskilling Existing Employees to Prevent Attrition**

**Don't Call It Workplace Drama – When It is Actually Uncivil Behavior**

**When to Cut the Cord on Poor Performing Employees**

RCZ 4 Hours

**1:00 pm – 5:00 pm**

**Marc Seitz, DVM, DACVR, DABVP**

**Diagnosing GI Obstructions**

**Diagnosing Abdominal Organ Torsions**

**No, it's Not Heart Failure: A Thoracic Radiography Case Series**

**Imaging the Dyspneic Cat: A Case Series**

RCZ 4 Hours

Dr./LVMT

Robert Zepeda

has successfully completed

8 Hours of Continuing Education

---

Lee M. Hughes, MSCVMA Executive Director

**Approved by Tennessee Board of Veterinary Medical Examiners**



Memphis/Shelby County  
Veterinary Medical Association

Memphis/Shelby County Veterinary Medical Association  
23<sup>rd</sup> Annual Mid-South Regional Conference, Olive Branch, MS  
November 18, 2023

Saturday, November 18, 2023

8:00 am – Noon

Joseph Bartges, DVM, PhD, DACVIM, DACVN

Rusty Pipes: Chronic Kidney Disease

Leaky Pipes: Micturition Disorder: Stinky Pipes: UTIs

RGZ 4 Hours

1:00 pm – 5:00 pm

Jonathan Abbott, DVM, DACVIM

Canine Pulmonary Hypertension

Management of Canine Mitral Valve Disease

Managing Cardiac Cases – When Echo Isn't Available

Feline Cardiomyopathy

RGZ 4 Hours

Dr./LVMT

Robert Zeyer

has successfully completed

8 Hours of Continuing Education

Lee M. Hughes, MSCVMA Executive Director

Approved by Tennessee Board of Veterinary Medical Examiners

This program 20-1102840, has been approved for 1.00 hour of continuing education credit to any veterinarian and/or veterinary technician in jurisdictions that recognize RACE approval.

**Provider:** 50-28147

**RACE Category:** Medical Program

**Method of Delivery:** Seminar/Lecture & Interactive-Distance

**Course Type:** Live Course

CloserStill Media . 266 W 87 ST, Floor 12 . New York, NY 10018

# American Veterinary Medical Association

## DETAILED CONTINUING EDUCATION CERTIFICATE

AVMA Convention in Philadelphia

July 29 - August 2, 2022

This certifies that

### Robert Zepecki

has attended 20.00 hours of AVMA-approved continuing education credit for veterinary medical license renewal purposes.

Code	Session Title	Date	Credits
1051	A Rational Approach to PU/PD in Small Animal Medicine (VIRTUAL PLATFORM ONLY) Lawren Durocher-Babek	07/29/2022	1.00

---- continued on 2nd page ----

*John P. Sanders, Jr.*  
John P. Sanders, Jr., DVM, DACVPM  
Convention Education Program Committee Chair



# American Veterinary Medical Association

## DETAILED CONTINUING EDUCATION CERTIFICATE

Code	Session Title	Date	Credits
2501	Compounding Animal Drugs From Bulk Drug Substances – Key Points for Veterinarians (ON VIRTUAL PLATFORM ONLY) Amber McCoig	07/29/2022	1.00
1050	Feeding Tubes - The Good the Bad and the Ugly (VIRTUAL PLATFORM ONLY) Lawren Durocher-Babek	07/29/2022	1.00
1266	Top 5 Mistakes to Avoid in the Poisoned Patient Justine Lee	07/29/2022	1.00
1249	Principles of Cleft Palate and Oronasal Fistula Repair William Fox-Alvarez	07/29/2022	1.00
1262	Top 5 Feline Procedures You Must Know! Justine Lee	07/29/2022	1.00
2011	Syncopal: How to Keep Them From Falling... Neal Peckens	07/29/2022	1.00
1321	The Soft Tissues of Canine Orthopedics Anna Massie	07/29/2022	1.00
1188	Nutritional Approach to the Diabetic Patient Ed Carlson	07/30/2022	1.00
1041	The Cleft Palate Puppy – Nursing Care from Birth to Post-Op Wendi Rensman	07/30/2022	1.00
1082	Dental Radiography: Safety, Anatomy, Technique, Orientation, and More! Wendi Rensman	07/30/2022	1.00
1189	Nutritional Management of Pancreatitis Ed Carlson	07/30/2022	1.00
1283	Preparing Your Hospital for the Future of Veterinary Medicine Terence O'Neil	07/30/2022	1.00

---- continued on 3rd page ----

*John P. Sanders, Jr.*  
John P. Sanders, Jr., DVM, DACVPM  
Convention Education Program Committee Chair



# American Veterinary Medical Association

## DETAILED CONTINUING EDUCATION CERTIFICATE

Code	Session Title	Date	Credits
1454	Step-by-Step Introduction of Techniques for Surgical Extractions of the Teeth in the Dog Kevin Stepaniuk	07/30/2022	1.00
1508	Monitoring Feline Diabetes Mellitus Patty Lathan	07/30/2022	1.00
1036	Anesthesia for Brachycephalic Dogs Turi Aarnes	07/31/2022	1.00
1663	Cost of Caring – Understanding Stress Burnout and Compassion Fatigue Aggie Kieler	07/31/2022	2.00
1037	Anesthesia and Concurrent Medications: Drug Interactions and Considerations Turi Aarnes	07/31/2022	1.00
5025	Canine and Feline Diabetic Monitoring 1.0 (SPONSORED BY BOEHRINGER INGELHEIM) Catharine Scott-Moncrieff	07/31/2022	1.00
		<b>Total Credits</b>	<b>20</b>

*John P. Sanders, Jr.*  
John P. Sanders, Jr., DVM, DACVPM  
Convention Education Program Committee Chair



## Kara Maack (AGRI)

---

**From:** kara.m.maack@agriculture.arkansas.gov  
**Subject:** FW:

**From:** Tyler Sellers <tyler.sellers0901@gmail.com>  
**Sent:** Monday, January 6, 2025 3:25 PM  
**To:** Kara Maack (AGRI) <kara.m.maack@agriculture.arkansas.gov>  
**Subject:**

[You don't often get email from [tyler.sellers0901@gmail.com](mailto:tyler.sellers0901@gmail.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]



Memphis/Shelby County  
Veterinary Medical Association

Memphis/Shelby County Veterinary Medical Association  
24th Annual Mid-South Regional Conference, Olive Branch  
November 21, 2024

Thursday, November 21, 2024

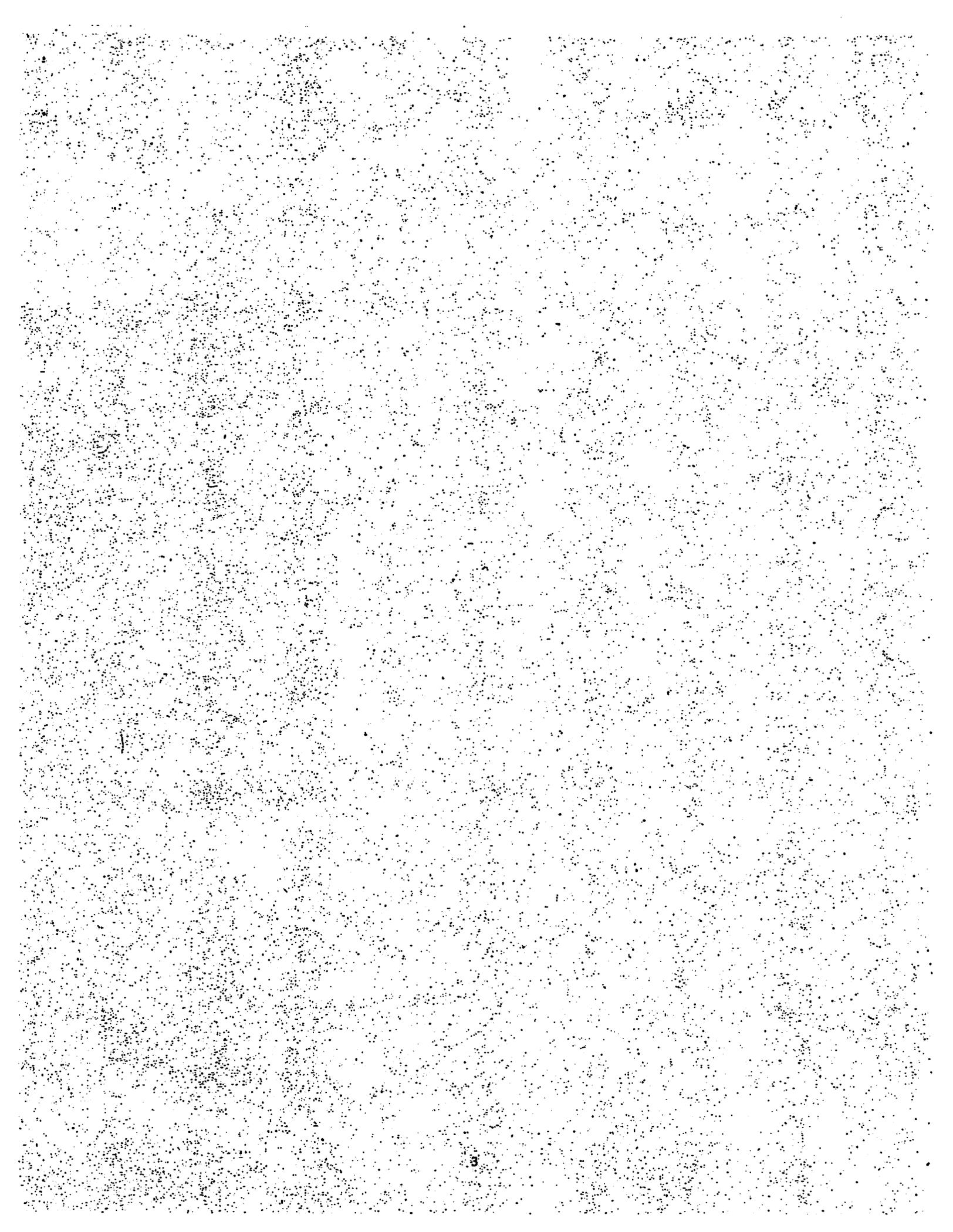
4:00 - 6:00 p.m.

Ryan Gibson, DVM, DACVIM  
Neurology

7:00 to 9:00 p.m.

Katherine Raines, PharmD, DICVP, FSVHP, BSPS  
Pharmacy, Law & Ethics

*D. L. HUNT* *D. L. H. G. Zepher* has successfu





Memphis/Shelby County  
Veterinary Medical Association

Memphis/Shelby County Veterinary Medical Association  
24th Annual Mid-South Regional Conference, Olive Branch  
November 23, 2024

Saturday, November 23, 2024

8:00 to 12:00 Noon

Mandy Wallace, DVM, MS, DACVS-SA  
Soft Tissue Surgery

1:00 to 5:00 p.m.

Jennifer Chatfield, DVM, Dipl.ACZM, Dipl. ACVPM  
Respiratory

Dr. / LVMT Robert G Zepecici has successfully

Memphis/Shelby County  
Veterinary Medical Association

Memphis/Shelby County Veterinary Medical Asso  
24th Annual Mid-South Regional Conference, Olive B  
November 22, 2024

Friday, November 22, 2024

8:00 to 12:00 Noon

Garrett Pachtinger, VMD, DACVECC  
Emergency / Critical Care

12:00 Noon to 1:00 p.m.

Jessica Duncan, DVM  
Find the Staff you Need in the Technology You Have

1:00 to 5:00 p.m.

Bash Halow, LVT, CVPM  
Practice Management

Dr. / LVMT \_\_\_\_\_ has successf

\_\_\_\_\_ Hours of Continuing Education

Tyler A. Sellers

# ALL PET CENTER

# Patient Chart

4147 Hwy 7 N.  
Hot Springs, AR 71909  
501-625-3418

Printed: 01-08-25 at 12:06p

## CLIENT INFORMATION

Name Mr. Gerald Mostrog (579)  
Address 4 Quedo Place  
Hot Springs Village, AR 71909  
Phone 501 922-3367

## PATIENT INFORMATION

Name	Max	Species	Canine
Sex	Male, Neutered	Breed	Shih Tzu
Birthday	06-13-12	Age	12y
ID		Rabies	4489-17
Color	Black & White	Weight	15.50 lbs
Reminded	02-15-24	Codes	

## HEALTH HISTORY SUMMARY

Date	Diagnosis
06-17-22	Hypertension
08-11-21	Cough
08-11-21	Atopy
10-08-20	Coccidiosis
12-21-18	Anal Sac Abscess
07-11-18	Allergic Tracheobronchitis
01-26-17	Dermatitis, Nonspecific
04-16-16	Atopy

PROBLEMS: Opened	By	Problem description	Closed	By
07-11-14	RZ	Well pet exam / Vac. update		
12-13-14	RZ	Well pet exam / Vac. update		
10-07-15	RZ	Well pet exam / Vac. update		
10-12-17	RZ	Well pet exam / Vac. update		
05-14-18	RZ	Well pet exam / Vac. update		
12-21-18	RZ	Anal glands expressed		
04-24-20	RZ	Exam		

## Max's weight history (in lbs)

03-13-24	15.50
04-28-21	15.50
04-28-21	15.00
09-11-20	14.50
04-24-20	14.00
02-12-20	14.00

08-13-19	16.00
08-13-19	14.00
04-09-19	16.10
04-09-19	15.00
12-21-18	15.12
05-23-18	15.00
05-14-18	15.00
10-12-17	14.50
04-03-17	14.00
02-01-17	14.00
10-17-16	13.80
10-07-15	13.25
12-29-14	13.25
12-13-14	12.50
07-11-14	13.00

MEDICAL HISTORY

Date	By	Code	Description	Qty (Variance)	Photo
03-13-24	RZ	CA	Canine Annual Vacc		
CH: 03-13-24 at 8:57a: Patient only recieved the Parvo-Corona and the Bordetella will come back next week to get the rest paid for all vaccines today.					

Age: 11y Weight: 15.50 Temp: 101.20 Respiration: 20.00 Pulse: 110.00  
CRT: 1.5 secs. BCS: 5.00

**SUBJECTIVE SECTION**

Owner's concerns: The owner is here for an annual vaccination update. No specific medical concerns have been raised at this time.

Behavioral history: No changes in behavior have been observed. The dog continues to be alert and engaged, showing no signs of lethargy or irritability.

Medical history: No significant medical history. The dog has been healthy and up-to-date with previous vaccinations. No new or chronic conditions reported.

Exercise level: The dog is still active, enjoys daily walks, and appears to have no issues with mobility or stamina.

Dietary habits: The dog is eating well and maintaining a healthy appetite. No changes in food intake or weight.

Specific concerns or observations: The owner has not noticed any unusual symptoms, such as coughing, vomiting, diarrhea, or changes in urination. No signs of discomfort or pain have been reported.

**OBJECTIVE SECTION**

General Appearance: Alert, well-groomed, and in good body condition. No signs of distress or discomfort observed.

Vital Signs:

Temperature: 101.2°F

Heart Rate: 110 bpm

Respiratory Rate: 20 breaths/min

Mucous Membranes: Pink and moist, capillary refill time <2 seconds.

Date	By	Code	Description	Qty (Variance)	Photo
------	----	------	-------------	----------------	-------

Pulse: Strong and regular.  
 Weight: 12.5 lbs  
 Body Condition Score (BCS): 5/9  
 Musculoskeletal System: No signs of lameness or stiffness. Normal gait observed.  
 Skin and Coat: Healthy coat, no hair loss, redness, or signs of itching. Coat is clean and shiny.  
 Eyes: Clear, no discharge or redness, pupils reactive to light.  
 Ears: Clean, no signs of infection or excessive wax buildup.  
 Teeth/Gums: Healthy teeth with minimal tartar. Gums pink and moist, no signs of gingivitis.  
 Cardiovascular: No murmurs or arrhythmias detected.  
 Respiratory: No coughing or abnormal lung sounds upon auscultation.  
 Abdomen: Soft and non-tender. No palpable masses.  
 Lymph Nodes: Not enlarged or painful.  
 Neurological: Mentation is normal. No signs of neurological deficits, such as weakness or disorientation.

03-13-24	RZ	13741	Bio-Hazard Fee		
		CD	Canine Dewormer		
		1887V	Virbantal Dewormer Small 6-25lbs		
CH: 03-13-24 at 8:57a: Owner recieved will give to patient when at home PO.					

		13741	Bio-Hazard Fee		
		COR	Nobivac Corona		
CH: 03-13-24 at 8:57a: Done given Subcutaneous					

		13741	Bio-Hazard Fee		
		DAPP	Nobivac DA2PPv		
CH: 03-13-24 at 8:57a: Done given Subcutaneous					

		13741	Bio-Hazard Fee		
		13741	Bio-Hazard Fee		
		4DX	Idexx HW-Anaplis-Borrelia-Ehrlichia 4DX		
CH: 03-13-24 at 8:57a: Done results entered					

Age: 11y

Heartworm	Negative
Lyme Disease	Negative
Ehrlichia	Negative
Anaplasma	Negative

	FF	Fecal Flotation, Centrifuge
CH: 03-13-24 at 8:57a: Done NPS		

	BORD	Intra-Trac II Bordetella
CH: 03-13-24 at 8:57a: Done given intranasal.		

03-20-24	RZ	13741	Bio-Hazard Fee		
		785	Nobivac Lyme vaccination, annual		
CH: 03-20-24 at 11:58a: Done given subcutaneously					

		0584566H	Nobivac HSN2/HSN8		
CH: 03-20-24 at 11:58a: Done given subcutaneously					

		LEP	Nobivac Lepto		
--	--	-----	---------------	--	--

Patient Chart for Max  
Date: 01-08-25, Time: 12:06p

Client: Mr. Gerald Mostrog

Page: 4

Date	By	Code	Description	Qty (Variance)	Photo
------	----	------	-------------	----------------	-------

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CH: 03-20-24 at 11:58a: Done given subcutaneously

(Additional history not shown)

# ALL PET CENTER

# Patient Chart

4147 Hwy 7 N.  
Hot Springs, AR 71909  
501-625-3418

Printed: 01-06-25 at 1:28p

## CLIENT INFORMATION

Name Mr. Al Pfeltz (8671)  
Address 955 East Hwy 171  
Hot Springs, AR 71913  
Phone 760 889-0778

## PATIENT INFORMATION

Name	Milo	Species	Canine
Sex	Male, Neutered	Breed	Dachshund Mix
Birthday	03-07-18	Age	6y
ID	991001911011724	Rabies	5983-19
Color	Tan	Weight	21.40 lbs
Reminded	10-31-24	Codes	

Milo's weight history (in lbs)

05-14-24	21.40
05-15-19	25.00

## MEDICAL HISTORY

Date	By	Code	Description	Qty (Variance)	Photo
05-14-24	RZ	351	Excise Mass- Per Tumor		

Age: 6y Weight: 21.40 Temp: 101.40 Respiration: 18.00 Pulse: 110.00  
CRT: 1 secs. BCS: 5.00 / 9.00

## SUBJECTIVE SECTION

**Owner's concerns:** The owner has brought the dog in for the evaluation and removal of a mass located behind the right shoulder blade. The mass has been noticed over the past few months and has been gradually increasing in size. The owner is concerned about the potential for the mass to be malignant and is seeking surgical removal.

**Behavioral history:** The dog has remained active and alert. No signs of lethargy, pain, or discomfort have been noted, though the mass seems to cause mild irritation when touched.

**Medical history:** No known history of similar masses. The dog is up-to-date on vaccinations, flea/tick prevention, and deworming. No other significant medical issues are noted. The dog has not had any recent trauma to the area of the mass.

**Exercise level:** The dog continues to enjoy walks and normal activity levels, though the mass may limit some movements, particularly if it becomes more noticeable or painful.

**Dietary habits:** The dog is eating well and has a healthy appetite. No changes in diet or weight observed.

**Specific concerns or observations:** The owner is concerned about the mass, particularly its rapid growth. No signs of infection, discharge, or changes in skin color around the mass. No issues with appetite, vomiting, diarrhea, or urinary habits have been reported.

Date	By	Code	Description	Qty (Variance)	Photo
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**Mass Characterization:** The mass behind the right shoulder blade is likely benign but has shown signs of gradual growth. Based on the size and location, it may be a lipoma, benign fatty tumor, or other soft tissue growth. Further evaluation, including histopathology post-surgery, will help determine its nature.

**Overall Health:** The dog appears to be in good health otherwise. No significant concerns regarding other organs or systems noted. The dog remains active and alert, with no signs of systemic illness such as weight loss, fever, or discomfort beyond localized irritation from the mass.

**Surgical Considerations:** Given the size of the mass, surgical removal is recommended to prevent further growth or discomfort. The mass does not appear to have affected the dog's movement or quality of life at this time.

**Post-surgical care:** Potential post-operative care should include pain management, incision site care, and monitoring for any signs of complications (e.g., infection or recurrence of the mass).

**OBJECTIVE SECTION**

**General Appearance:** Alert, well-groomed; and in good body condition. The dog appears comfortable and in no distress.

**Mucous Membranes:** Pink and moist, capillary refill time <2 seconds.

**Pulse:** Strong and regular.

**Mass:**

**Location:** On the right side, behind the shoulder blade.

**Size:** Approximately 3 cm x 4 cm in diameter, mobile, firm, and non-painful on palpation.

**Consistency:** Likely benign, soft and rubbery to the touch. No evidence of ulceration or redness in the surrounding skin.

**Temperature:** Not warm or inflamed.

**Border:** Well-defined, no indication of invasion into surrounding tissues or muscle.

**Skin and Coat:** Healthy coat, no signs of infection or irritation around the mass. Skin over the mass appears intact.

**Eyes:** Clear, no discharge or redness, pupils reactive to light.

**Ears:** Clean, no signs of infection or excessive wax buildup.

**Teeth/Gums:** Healthy teeth with minimal tartar. Gums are pink and moist, no signs of gingivitis.

**Cardiovascular:** No murmurs or arrhythmias detected.

**Respiratory:** No coughing, wheezing, or abnormal lung sounds on auscultation.

**Abdomen:** Soft and non-tender, no palpable masses or abnormalities.

**Lymph Nodes:** Not enlarged or painful.

**Neurological:** Mentation is normal. No signs of neurological deficits, such as weakness or disorientation.

05-14-24

RZ VISIT Patient check-in  
SUTURE Suture removal

TS: 05-27-24 at 11:50a: done- site looks good

KETMIT Ketamine/Midazolam  
13741 Bio-Hazard Fee  
788 Pen/Dex/B12 IM Med Dog

Date	By	Code	Description	Qty (Variance)	Photo
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given IM

Pen		1.0	300,000u/ml		
Dex		1.0	2mg/ml		
B12		1.0	3000 mcg/ml		

05-14-24

RZ	13741	Bio-Hazard Fee
	9991	Surgical preparation

Prepping mass located behind the right shoulder blade for surgical excision.  
Area clipped and aseptically prepped.  
Patient positioned appropriately for access to the surgical site.  
All necessary surgical instruments and supplies prepared.

	PRO1	Propoflo Anesthetic
--	------	---------------------

4cc given IV

	13741	Bio-Hazard Fee
	223	Histopath

Pathology Note: Impression Smear

Source: Impression smear from the excised mass behind the right shoulder blade.

Procedure: Tissue impression prepared, stained with Diff-Quik, and evaluated in-house.

Findings: Normal cytological findings consistent with benign processes. No evidence of malignancy, significant inflammation, or infection observed.

Assessment: Gross appearance of the mass is consistent with a lipoma.

Plan: Full pathology is not recommended at this time based on findings. Results will be documented and communicated to the owner.

(Additional history not shown)

# ALL PET CENTER

# Patient Chart

4147 Hwy 7 N.  
Hot Springs, AR 71909  
501-625-3418

Printed: 01-08-25 at 1:14p

## CLIENT INFORMATION

Name Mr/Mrs. Stacy Crigger (11779)  
Address 116 Haymaker Place; Apartment B  
Hot Springs, AR 71901  
Phone 479 970-8457

## PATIENT INFORMATION

Name	Baxter	Species	Canine
Sex	Male, Neutered	Breed	Bichon-Frise
Birthday	08-16-20	Age	4y
ID		Rabies	
Color	White	Weight	9.30 lbs
Reminded	(none)	Codes	

## HEALTH HISTORY SUMMARY

Date	Diagnosis
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04-04-24	Gastroenteritis
----------	-----------------

04-04-24	Foreign Body
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Baxter's weight history (in lbs)

04-04-24	9.30
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## MEDICAL HISTORY

Date	By	Code	Description	Qty (Variance)	Photo
12-14-23	***	RV1	Canine Rabies 1yr- Only		
04-04-24	RZ	VISIT	Patient check-in chicken bone ingestion. hematochezia		

Age: 3y    Weight: 9.30    Temp: 100.90    Respiration: 18.00    Pulse: 102.00  
CRT: 2 secs.

## SUBJECTIVE SECTION

### Presenting Complaint:

Canine patient presents with bloody diarrhea following the ingestion of a cooked chicken bone. Owner reports the onset of symptoms occurred within the last 12-24 hours.

### History:

**Primary Concerns:** Bloody diarrhea, recent dietary indiscretion involving cooked chicken bone ingestion.

**Dietary History:** Regularly fed a commercial dog food diet. No significant history of dietary sensitivities.

**Owner notes the dog consumed a cooked chicken bone approximately 12-24 hours ago.**

**Behavioral Changes:** Mild lethargy observed; otherwise alert and responsive.

**Gastrointestinal Signs:** No vomiting reported at this time, though there is concern about potential

Date	By	Code	Description	Qty (Variance)	Photo
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obstruction or irritation.

Preventatives: No preventative history provided

Vaccines: No vaccination history provided

Environment: Primarily indoor with supervised outdoor access. No recent exposure to ill animals.

Other Pets: No other pets in the household or no reported issues with cohabiting animals.

Medical History: No known prior gastrointestinal issues or allergies. No significant chronic health concerns.

**Owner-Provided Observations:**

Appetite and Water Intake: Decreased interest in food but normal water consumption.

Activity Level: Slightly less active than normal but still responsive.

Other Concerns: Owner denies coughing, sneezing, vomiting, or other abnormalities apart from diarrhea.

**Summary:**

Patient presents with acute bloody diarrhea following recent ingestion of a cooked chicken bone. There is concern for potential gastrointestinal irritation, partial obstruction, or perforation secondary to bone ingestion. Owner denies vomiting or other systemic signs at this time, but mild lethargy and reduced appetite are noted. Further diagnostic evaluation and monitoring for signs of obstruction or perforation are warranted.

**OBJECTIVE SECTION**

**Physical Examination Findings:**

General Appearance: Alert but mildly lethargic. Normal body condition score (BCS).

Hydration Status: Mildly dehydrated (noted by slightly tacky mucous membranes and prolonged skin tent).

Mucous Membranes (MM): Pink, slightly tacky; capillary refill time (CRT) ~2 seconds.

Abdominal Palpation: Mild tenderness noted; no overt signs of abdominal distension or masses. No palpable evidence of obstruction, but discomfort suggests potential irritation or early signs of obstruction.

Rectal Examination: Evidence of fresh blood in feces. No obvious foreign material or abnormalities detected.

Gastrointestinal (GI): Auscultation reveals normal gut sounds.

Cardiovascular (CV): Heart rate normal for age and breed. No murmurs or arrhythmias auscultated.

Respiratory: Normal respiratory rate and effort; lungs auscultate clear.

Neurological: Alert and responsive. No neurological deficits observed.

Musculoskeletal: Normal gait; no signs of pain or lameness.

**Observations:**

Bloody diarrhea consistent with GI irritation or injury.

No overt signs of shock or systemic compromise at this time, but mild dehydration present.

Potential foreign body ingestion (chicken bone) remains a concern, warranting imaging and close monitoring.

**Summary of Objective Findings:**

The patient exhibits mild lethargy, dehydration, and abdominal tenderness with fresh blood in the stool. No immediate evidence of systemic instability, but further diagnostics are required to confirm or rule out foreign body obstruction, perforation, or secondary complications.

**Diagnostics:**

Date	By	Code	Description	Qty (Variance)	Photo
			Abdominal Radiographs with and without Contrast: Pending results to evaluate for presence of foreign body or perforation. Fecal Examination: Recommended to rule out parasitic or infectious causes of bloody diarrhea. Complete Blood Count (CBC): Recommended to assess for anemia, infection, or inflammation. (Owner declined) Chemistry Panel: Recommended to evaluate kidney, liver function, and electrolyte status. (Owner declined)		

### ASSESSMENT SECTION

#### NOTES

##### Radiology Report: Abdominal X-Ray Findings

##### Findings:

Multiple small, linear, radiopaque fragments consistent with broken chicken bone are observed within the stomach.

Fragments appear irregularly shaped but are localized to the stomach without evidence of migration into the intestines.

No signs of obstruction or perforation are noted in the gastrointestinal tract at this time.

Intestinal gas patterns and soft tissue structures are within normal limits. No free abdominal gas or fluid indicative of perforation.

##### Impression:

Broken chicken bone fragments visualized within the stomach.

#### DIAGNOSES

Foreign Body

### PLAN SECTION

#### NOTES

##### Plan:

Patient is being administered Generlac (lactulose) to facilitate gastrointestinal motility and aid in the movement of foreign body fragments through the digestive tract.

Patient will remain hospitalized overnight for close monitoring of clinical signs, including vomiting, abdominal discomfort, or changes in stool consistency.

##### Overnight Monitoring Goals:

Assess patient for any signs of discomfort

##### Plan for Morning:

If radiographs confirm that the foreign body fragments have reached the colon by morning, an enema will be administered to aid in their passage.

If the patient shows no signs of distress or complications and passes the fragments successfully, they will be discharged home with instructions for continued observation by the owner.

##### Owner Communication:

Date	By	Code	Description	Qty (Variance)	Photo
The owner will be updated on the patient's condition and the treatment plan. Discharge instructions will include signs to monitor for and guidelines for follow-up care.					
04-04-24	RZ	APPT\$	Appointment notes for 04-04-24 chicken bone ingestion. hematochezia		
		DREX2	Walk-In Fee		
		RAD	Digital X-Ray foreign body in gastrum		
		RAD1	Digital X-Ray, Added Views		
		392	Generlac po		
			TS: 04-04-24 at 4:36p: 10cc given po		
		D2045	Foreign Body		
		D2047	Gastroenteritis		
		788	Pen/Dex/B12 IM Med Dog		
			TS: 04-04-24 at 4:37p: given IM		
		Pen	1.0 300,000u/ml		
		Dex	1.0 2mg/ml		
		B12	1.0 3000 mcg/ml		
		13741	Bio-Hazard Fee		
04-05-24	RZ	RAD1	Digital X-Ray, Added Views fb in colon		
		258	Enema given		
		70018	Cimetidine Oral Sol. . 300mg / 5ml #944 Give one dropperful twice daily thirty minutes before meals		
		RAD1	Digital X-Ray, Added Views	3	
		258	Enema	2	
			Enema administered. Large bowel movement noted. F/U X-ray: Colon clear of foreign body. Plan: Discharge this afternoon with home care instructions. Stable for release.		

# ALL PET CENTER

# Patient Chart

4147 Hwy 7 N.  
Hot Springs, AR 71909  
501-625-3418

Printed: 01-08-25 at 11:45a

## CLIENT INFORMATION

Name Mr/Mrs. Eli Keller (12253)  
Address 17 Sugarloaf Loop  
Maumelle, AR 72113  
Phone 501 626-1748

## PATIENT INFORMATION

Name	Shumba	Species	Canine
Sex	Male	Breed	Rhodesian Ridgeback
Birthday	06-02-24	Age	7m
ID		Rabies	
Color	Red	Weight	75.00 lbs
Reminded	(none)	Codes	

## HEALTH HISTORY SUMMARY

PROBLEMS: Opened	By	Problem description	Closed	By
12-29-24	RZ	Vomiting		
12-29-24	RZ	Lethargic		

## MEDICAL HISTORY

Date	By	Code	Description	Qty (Variance)	Photo
12-29-24	RZ	NPAFTR	Emergency Fee		
			Suspected Gastroenteritis Cannot rule anything out without the bloodwork		

Age: 7m Temp: 101.50 Respiration: 32.00 Pulse: 116.00  
CRT: 2 secs. Pain Scale: 2

## SUBJECTIVE SECTION

The dog is presenting with lethargy and recurrent vomiting of mucus-like liquid. The owner reports that the dog has been less active and more subdued over the past 24-48 hours, showing decreased interest in food and water. The vomiting episodes are described as frequent but non-bloody, and the dog appears to be uncomfortable after each event.

The owner notes that the dog is usually active and playful but is now spending most of the day lying down, with limited interaction. There has been no noticeable change in bowel movements or appetite, though the dog has shown a reluctance to eat. The dog's hydration status seems to have declined, likely due to both the vomiting and decreased fluid intake, as evidenced by the dry mucous membranes and slightly sunken eyes observed during the examination.

No prior history of foreign body ingestion noted.

Given the lethargy, mucus-producing vomiting, and dehydration, the owner is concerned about the possibility of an infectious or gastrointestinal condition, such as a viral infection, gastritis, or possible

Date	By	Code	Description	Qty (Variance)	Photo
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foreign body ingestion.

There is also concern about the dog's general discomfort, especially after vomiting, and the owner is seeking advice on managing the dog's hydration and overall well-being during this period.

**PROBLEM LIST**

Lethargic  
Vomiting

**OBJECTIVE SECTION**

Hydration: Dehydrated, evidenced by sunken eyes and dry mucous membranes.

EENT (Eyes, Ears, Nose, Throat):

Eyes: Mild conjunctival redness, no discharge.

Ears: No discharge, no odor, no signs of infection.

Nares: Clear with no nasal discharge.

Throat: No visible obstructions; mild gagging when attempting to swallow.

Integument: Coat appears dull, slightly dry, but no significant rashes or lesions.

Peripheral Lymph Nodes: No enlargement or tenderness of peripheral lymph nodes.

Cardiovascular: Heart rate elevated but regular, pulses strong and symmetrical, no murmurs detected.

Respiratory: Mild wheezing, but no crackles or signs of respiratory distress. Mucus production observed when vomiting.

Gastrointestinal: Vomiting mucus-like liquid, no evidence of blood in vomit. Abdomen soft and non-painful upon palpation.

Rectal: Normal externally, no signs of discomfort or abnormalities.

Genitourinary: Urinary bladder soft, non-tender, and no abnormal discharge from genitalia.

Musculoskeletal: Ambulatory x4, appears weak but able to stand and walk. No signs of lameness or pain on palpation of limbs.

Neurologic: Lethargic, but alert when stimulated. Mentation appropriate for level of lethargy. No cranial nerve deficits. Proprioception intact in all limbs.

Pain: 2/10 – mild discomfort likely due to general lethargy and possible gastrointestinal upset.

Lethargy and vomiting mucus could suggest a gastrointestinal issue, infection, or possibly a viral illness. The dog's lack of appetite and the presence of mucus indicate there may be irritation or inflammation in the stomach or intestines. Determining through barium swallow study the presence of foreign body ingestion.

Dehydration should be addressed immediately with subcutaneous fluids

Owner denies lab panels.

**ASSESSMENT SECTION**

**NOTES**

Date	By	Code	Description	Qty (Variance)	Photo
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Monitoring is crucial for worsening symptoms, especially if the vomiting persists or the dog's condition deteriorates. - Owner Declined further treatment.

**DIAGNOSES**

Dehydration  
 Vomiting

**PLAN SECTION**

**TREATMENT PLAN**

Bio-Hazard Fee  
 Fluids, SC, large dog  
 12-29-24 RZ VISIT Patient check-in

Age: 7m

RAD Digital X-Ray  
 RAD1 Digital X-Ray, Added Views  
 BARIUM Barium Sulfate

given po

cc 30

797 Reglan, metoclopramide 10 mg, (5mg/ml)

1.5cc given IM

Reglan 1.5 150 mg/30 ml

13741 Bio-Hazard Fee  
 789 Pen/Dex/B12 IM Large dog  
 392 Generlac po

8cc given po

cc 8

6112 Cimetidine 300mg #1689 30

Give 1/2 tablet twice daily

F904 Fluids, SC, large dog

fluids given at half maintenance (400cc) sq

ml 400.0

13741 Bio-Hazard Fee  
 STAFF Staff Notes

CH: 12-29-24 at 2:23p: Patient was presented to clinic with complaints of being lethargic. Patient is BAR. Temp is 105.1 Dr. Bob advised blood work and an over night stay to give fluids and get patients temp down owner declined advised they are taking him to their normal vet in the morning. We gave subcutaneous fluids and a pen/dex/b12 before releasing patient with their owner with the understanding of the patients fever.

Technician TPR TPR  
 CH: Cassie Hooper  
 Time 8:52a  
 Temperature 105.1

**Patient Chart for Shumba**  
Date: 01-06-25, Time: 11:45a

Client: Mr/Mrs. Eli Keller

Page: 4

<b>Date</b>	<b>By</b>	<b>Code</b>	<b>Description</b>	<b>Qty (Variance)</b>	<b>Photo</b>
			<b>Attitude</b>		
			Bright, Alert, Responsive		
			<b>Heart Rate</b>		
			116.0		
			<b>Resp. Rate</b>		
			32.0		
			<b>Walk</b>		
			Patient is Mobile		
			<b>BM</b>		
			Checked		
			<b>Urine</b>		
			Checked		
			<b>Vomit</b>		
			Positive		
			<b>Medications</b>		
			None		
			<b>Food</b>		
			Yes		
			<b>Water</b>		
			Yes		

**Notes**

CH: 12-29-24 at 2:23p: Patient was presented to clinic with complaints of being lethargic. Patient is BAR. Temp is 105.1 Dr. Bob advised blood work and an over night stay to give fluids and get patients temp down owner declined advised they are taking him to their normal vet in the morning. We gave subcutaneous fluids and a pen/dex/b12 before releasing patient with their owner against medical advice with the understanding of the patients fever.

# ALL PET CENTER

# Patient Chart

4147 Hwy 7 N.  
Hot Springs, AR 71909  
501-825-3418

Printed: 01-08-25 at 1:19p

## CLIENT INFORMATION

Name Mr/Mrs. Hayden Fortner (12128)  
Address 128 Wyles Lane  
Jessieville, AR 71949  
Phone 501 915-4910

## PATIENT INFORMATION

Name	Goober	Species	Feline
Sex	Male, Neutered	Breed	Domestic Shorthair
Birthday	10-19-23	Age	14m
ID		Rabies	
Color	Orange	Weight	10.80 lbs
Reminded	(none)	Codes	

## HEALTH HISTORY SUMMARY

PROBLEMS: Opened	By	Problem description	Closed	By
	10-18-24	RZ		Surgery

## Goober's weight history (in lbs)

10-18-24	10.80
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## MEDICAL HISTORY

Date	By	Code	Description	Qty (Variance)	Photo
10-18-24	RZ	ARFFN	ARF Feline Neuter Removed two mature testicles through parallel vertical scrotal incision. exteriorized both testes and ligated with own tissues.		

Age: 12m Weight: 10.80 Temp: 100.60 Respiration: 32.00 Pulse: 105.00  
CRT: 2 secs.

## SUBJECTIVE SECTION

Owner's concerns: The owner is here for the cat's neuter procedure. No specific health concerns are reported, but the owner may ask questions regarding post-surgical care or general well-being.

Behavioral history: The cat is generally healthy and active. The owner reports that the cat is playful, curious, and social. No signs of lethargy, aggression, or other behavioral changes have been noticed.

Medical history: The cat is not up-to-date on vaccinations and has never received regular preventive care. No history of illness, injury, or chronic conditions reported. owner did give permission to give rabies vaccine.

Exercise level: The cat is active and enjoys playing. The owner mentions no changes in activity level or behavior since last visit.

Date	By	Code	Description	Qty (Variance)	Photo
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Dietary habits: The cat is eating a balanced commercial diet and drinking normally. No changes in appetite or weight.  
Specific concerns or observations: The owner has not observed any issues with urination, defecation, vomiting, or diarrhea. No signs of discomfort or illness have been reported.

**PROBLEM LIST**

Surgery

**OBJECTIVE SECTION**

Hydration: Properly Hydrated  
EENT: Eyes, ears, and nares are clear bilaterally. MM pink  
Integument: Clear and healthy  
Peripheral LN: Within normal size limits  
Cardiovascular: Heart rate and rhythm regular  
Respiratory: Clear breath sounds  
Gastrointestinal: Unremarkable  
Rectal: Normal externally  
Genitourinary: Urinary bladder is soft, non-painful. Unremarkable external genitalia  
Musculoskeletal: Ambulatory x4  
Neurologic: Alert, mentation appropriate, no cranial nerve deficits. CP normal in all limbs  
Pain: 0/10

**PLAN SECTION**

**NOTES**

10-18-24  
Removed two mature testicles through parallel vertical scrotal incision. exteriorized both testes and ligated with own tissues.  
RZ 0714 Pain and infection prevention administered IM  
administered IM  
Penicillin 0.5 300,000units/ml  
Dex 0.5 2mg/ml  
B12 0.5 3000mcg/ml  
13741 Bio-Hazard Fee  
122 Rabies, Feline Nobivac 1yr.  
administered sq  
13741 Bio-Hazard Fee  
9991 Surgical preparation  
308 Ketamine/Acepromazine IM Feline  
Ketamine 0.4  
Acepromazine 0.2 10mg/ml  
13741 Bio-Hazard Fee  
ECOLL E-Collar  
VOUCHER Spay & Neuter voucher  
PR391 Surgery

# ALL PET CENTER

# Patient Chart

4147 Hwy 7 N.  
Hot Springs, AR 71909  
501-625-3418

Printed: 01-08-25 at 11:59a

## CLIENT INFORMATION

Name Mr./Mrs. Celsi Silva (12222)  
Address 35 Segovia Dr  
Hot Springs village, AR 71909  
Phone 325 668-7938

## PATIENT INFORMATION

Name	Honey	Species	Feline
Sex	Female, Spayed	Breed	Domestic Short Hair
Birthday	12-14-23	Age	12m
ID		Rabies	
Color	Tortie	Weight	7.50 lbs
Reminded	(none)	Codes	

## HEALTH HISTORY SUMMARY

PROBLEMS: Opened	By	Problem description	Closed	By
12-30-24	RZ	Surgery--ovariohysterectomy		

## Honey's weight history (in lbs)

12-30-24	7.50
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## MEDICAL HISTORY

Date	By	Code	Description	Qty (Variance)	Photo
12-30-24	RZ	ARFFS	ARF Feline Spay Patient surgery went accordingly no complications. Removed an intact juvenile uterus through a ventral midline incision. Ligated with 2/0 gut, closed abdomen and skin in separate layers with ss simple interrupted. Patient is currently BAR.		

Age: 12m Weight: 7.50 Temp: 101.50 Respiration: 24.00 Pulse: 160.00  
CRT: 2 secs. BCS: 5.00 / 9.00

## SUBJECTIVE SECTION

### Subjective Observations:

#### Behavior/Attitude:

The patient appears alert, bright, and responsive. No signs of lethargy, aggression, or fear observed.

#### Appetite and Thirst:

Owner reports normal appetite and hydration status. No changes in eating or drinking habits noted.

#### Urination/Defecation:

Regular urination and defecation as reported by the owner. No signs of straining, blood, or abnormalities.

Date	By	Code	Description	Qty (Variance)	Photo
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**Activity Level:**

Normal activity for age; playful and interactive. No reported signs of excessive restlessness or inactivity.

**Reproductive History:**

No prior pregnancies. No history of heat-related behavioral issues reported recently.

**General Health:**

Owner denies any recent illness, vomiting, diarrhea, coughing, or sneezing. Vaccination and deworming status up to date.

**Dietary Intake:**

Fed a complete and balanced diet. No recent changes in diet or gastrointestinal disturbances reported.

**Subjective Notes:**

The patient appears to be in good general health based on owner-reported history and current observations. Proceeding with pre-operative physical examination and diagnostics is recommended to ensure suitability for anesthesia and surgery.

**PROBLEM LIST**

Surgery--ovariohysterectomy

**OBJECTIVE SECTION**

**Physical Exam:**

**Mucous Membranes:** Pink and moist

**Skin/Fur:** Coat appears clean and healthy, no signs of ectoparasites, alopecia, or lesions.

**Eyes:**

Clear, no discharge or abnormalities. Pupils equal, round, and reactive to light.

**Ears:**

Clean, no odor or discharge. No signs of inflammation.

**Oral Cavity:**

Teeth and gums in good condition. No visible tartar or gingivitis.

**Lymph Nodes:**

Not enlarged (submandibular, prescapular, and popliteal palpable).

**Cardiovascular System:**

No murmurs or arrhythmias auscultated. Peripheral pulses strong and synchronous.

**Respiratory System:**

Lungs clear on auscultation. No wheezes or crackles.

**Abdomen:**

Soft and non-painful on palpation. No abnormalities detected.

**Urogenital:**

Normal external genitalia. No signs of heat or discharge.

**Musculoskeletal:**

Normal gait and posture. No signs of lameness or pain.

Date	By	Code	Description	Qty (Variance)	Photo
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Behavior:  
 Calm and cooperative during the examination.

Objective Notes:  
 The patient appears healthy with no abnormalities detected on physical exam. She is a good candidate for elective spay surgery.

**ASSESSMENT SECTION**

**NOTES**

Patient surgery went accordingly no complications. Removed an intact juvenile uterus through a ventral midline incision. Ligated with 2/0 gut, closed abdomen and skin in separate layers with simple interrupted suture. Patient is currently BAR.

12-30-24	RZ	VISIT	Patient check-in		
	Spay				
	Spay	APPT\$	Appointment notes for 12-30-24		
	given IM	0714	Pain and infection prevention		
	Penicillin	0.5 300,000units/ml			
	Dex	0.5 2mg/ml			
	B12	0.5 3000mcg/ml			
		13741	Bio-Hazard Fee		
		804	Ketamine/Acepromazine IM canine		
	Ketamine	0.4 ml			
	Acepromazine	0.2 10mg/ml			
		13741	Bio-Hazard Fee		
		9991	Surgical preparation		
	Clipped the fur over the abdomen, extending from the xiphoid process to just above the pubis. Area clean and dry. Used povidone-iodine to disinfect the surgical site				
	administered sq	122	Rabies, Feline Nobivac 1yr.		
		13741	Bio-Hazard Fee		
		SUTURE	Suture removal		
		ECOLL	E-Collar		
		720	Dopram injection		
	Dopram Administered	0.3 400mg/20ml			
		IV			
		13741	Bio-Hazard Fee		
		VOUCHER	Spay & Neuter voucher		
		PR397	Surgery--ovariohysterectomy		