LICENSE REINSTATEMENT AGREEMENT BETWEEN
MICHAEL W. SNELGROVE, D.V.M.
AND THE
TEXAS BOARD OF VETERINARY MEDICAL EXAMINERS

Be it remembered that on this the 8th day of February, 1991, came on to be heard the matter of the application for reinstatement of the cancelled license of MICHAEL W. SNELGROVE, D.V.M. After consideration of Dr. Snelgrove’s application, the Board determined, and Dr. Snelgrove agrees, that Dr. Michael W. Snelgrove’s license will be reinstated based on the following conditions:

1. Take and pass the State Board Examination.

2. Dr. Snelgrove will enter a Peer Assistance Program, under the Texas Dental Association auspices and in cooperation with Jim Hill and Dr. Michael J. Healy, for a period of five years, and the program will start immediately and include:
   A. Ninety meetings in a period of ninety days.
   B. Random, no-notice drug screens, at Dr. Snelgrove’s expense, with the results to be reported to the Board Staff.
   C. A Sponsor responsible for reporting any program violations to the Board Offices.

3. Dr. Snelgrove agrees not to apply for a DEA or DPS Narcotics Certificate until he satisfactorily completes the five year Peer Assistance Program.

4. Dr. Snelgrove agrees to inform future employers of past chemical abuse problems and provide Board Offices with written confirmation of this provision.

5. Dr. Snelgrove understands and agrees that if there are any violations of this Agreement, his veterinary license number 6075 will be cancelled.

I fully understand and agree to strictly adhere to the provisions of this Agreement.

Michael W. Snelgrove, D.V.M.

Date: 2-21-91

SUBSCRIBED and SWORN TO before me by the said Michael W. Snelgrove, D.V.M., this the 8th day of February, 1991.

Robbin L. Day
Notary Public in and for Texas
Executed this the 8th day of February, 1991.

ROBERT D. LEWIS, D.V.M.
PRESEIDENT

MARY E. MAINSTER, D.V.M.
VICE-PRESIDENT

GUY A. SHEPPARD, D.V.M.
SECRETARY

OLIVIA R. EUDALY
MEMBER

ALTON F. HOPKINS, JR., D.V.M.
MEMBER

MIKE LEVI
MEMBER

FRED K. SOIFER, D.V.M.
MEMBER

CLARK S. WILLINGHAM
MEMBER

ABSENT
Executed this the 8th day of February, 1991.

ROBERT D. LEWIS, D.V.M.
President

MARY E. MAINSTER, D.V.M.
Vice-President

GUY A. SHEPPARD, D.V.M.
Secretary

ABSENT

LARRY M. DUBUISSON, D.V.M.
Member

OLIVIA R. EUDALY
Member

ALTON F. HOPKINS, JR., D.V.M.
Member

MIKE LEVI
Member

FRED K. SOIFER, D.V.M.
Member

CLARK S. WILLINGHAM
Member
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ABSENT

MIKE LEVI  
MEMBER

FRED K. SOIFER, D.V.M.  
MEMBER

ABSENT

LARRY M. DUBUSSION, D.V.M.  
MEMBER

CLARK S. WILLINGHAM  
MEMBER

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MEMBER
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MARY E. MAINSTER, D.V.M.
VICE-PRESIDENT

GUY A. SHEPPARD, D.V.M.
SECRETARY

ALTON F. HOPKINS, JR., D.V.M.
MEMBER

MAYE LEVI
MEMBER

FRED K. SOIFER, D.V.M.
MEMBER

CLARK S. WILLINGHAM
MEMBER

OLIVIA R. EUDALY
MEMBER
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ABSENT
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MEMBER

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CLARK S. WILLINGHAM

MEMBER

OLIVIA R. EUDALY

MEMBER
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MEMBER

MIKE LEVI
MEMBER

FRED K. SOIFER, D.V.M.
MEMBER

CLARK S. WILLINGHAM
MEMBER
FINDINGS AND ORDERS OF THE BOARD

TEXAS BOARD OF VETERINARY MEDICAL EXAMINERS

VS.

MICHAEL W. SNELGROVE, D.V.M.

TEXAS VETERINARY LICENSE NUMBER 6075

BOARD ORDER ACCEPTING LICENSE FOR SURRENDER AND CANCELLATION

On the 3rd day of February, 1989, Dr. Michael W. Snelgrove voluntarily surrendered Texas Veterinary License Number 6075 for cancellation in lieu of disciplinary action arising out of a violation of Board Findings and Orders in reference to Docketed Case No. 1987-25.

On the 3rd day of February, 1989, the attached statement was presented to the Board for acceptance. Accordingly, the Board accepted Texas Veterinary License Number 6075, previously issued to Dr. Michael W. Snelgrove, for surrender, and ordered License Number 6075 be cancelled.

EXECUTED this the 3rd day of February, 1989.

Jim F. Humphrey
President

Fred E. Stiefel
Fred K. Stiefel, D.V.M., Vice-President

2/3/89

Date

2/3/89

Date

Robert D. Lewis, D.V.M., Secretary

2-3-89

Date

W. L. "Dub" Anderson, D.V.M., Member

2-3-89

Date

Larry M. Dubuisson, D.V.M., Member

2/3/89

Date

Olivia R. Eudaly, Member

Date
Mike Levi, Member
2/3/89

Mary E. Mainster, D.V.M., Member
2/3/89

Edward S. Murray, D.V.M., Member
2/3/89
STATE OF TEXAS

COUNTY OF

BEFORE ME, the undersigned notary public, on this day personally appeared MICHAEL W. SNELGROVE, D.V.M., P. O. Box 734, Leonard, Bonham County, Texas, who after being duly sworn, upon oath, deposed and said:

I, MICHAEL W. SNELGROVE, D.V.M., of P. O. Box 734, Leonard, Bonham County, Texas and holder of Texas Veterinary License Number 6075, after conferring with DONALD B. WILSON, Executive Director, Texas Board of Veterinary Medical Examiners, voluntarily state as follows:

I hereby request that the Texas State Board of Veterinary Medical Examiners accept this voluntary surrender of my veterinary license in lieu of disciplinary action arising out of violations of a Board Order, in reference to Docketed Complaint 1987-25. I request the Board to take appropriate action to cancel same, effective immediately. I understand that reinstatement of my license will only be considered; upon my petition to the Texas Board of Veterinary Medical Examiners, at the sole discretion of the Board, and will include any conditions the Board deems necessary.

MICHAEL W. SNELGROVE, D.V.M.

SUBSCRIBED and SWORN to by the said MICHAEL W. SNELGROVE, D.V.M., before me, on this the 21st day of February, 1989, to certify which, witness my hand and seal of office.

Notary Public in and for Texas

[Notary Seal]
TEXAS STATE VETERINARY BOARD  
1946 SOUTH IH 35 ROOM 306  
AUSTIN, TEXAS 78704

DEAR MR. DON WILSON,

I request the Texas Veterinary Board accept this voluntary surrender of my Veterinary License. It’s in lieu of disciplinary action, Arising out of a Board order in reference of docketed complaint #1987-25.

Sincerely,

Michael W. Snelgrove
DOCKETED COMPLAINT NO. 1987-25-AMENDED

TEXAS STATE BOARD OF VETERINARY MEDICAL EXAMINERS

vs.

MICHAEL W. SNELGROVE, D.V.M.

TEXAS VETERINARY MEDICAL LICENSE NO. 6075
1987 RENEWAL CERTIFICATE NUMBER 3961

FINDINGS, CONCLUSIONS AND ORDERS OF THE BOARD

On the 1st day of October, 1987, the TEXAS STATE BOARD OF VETERINARY MEDICAL EXAMINERS, being in regular meeting at 1946 South IH 35, fourth floor Conference Room, Austin, Travis County, Texas, such meeting being called for the purpose of hearing and considering the above numbered and entitled complaint as well as for consideration of other Board business, and the above entitled and numbered complaint having been previously scheduled for hearing and Defendant, the said MICHAEL W. SNELGROVE, D.V.M., having been duly notified and the following members of the TEXAS STATE BOARD OF VETERINARY MEDICAL EXAMINERS being present to-wit:

- DR. ED B. AVERY, President
- DR. EDWARD S. MURRAY, Vice-President
- DR. W. L. "DUB" ANDERSON, Secretary
- MR. JIM F. HUMPHREY, Member
- MR. MIKE LEVI, Member
- DR. MARY E. MAINSTER, Member
- DR. FRANK E. MANN, JR., Member
- DR. FRED K. SOIFER, Member

of Pearsall, TX
of Spur, TX
of Addison, TX
of Henrietta, TX
of Spicewood, TX
of San Antonio, TX
of Wharton, TX
of Houston, TX

At 9:00 a.m., the appointed hour, the President of the Board, DR. ED B. AVERY ordered the case to proceed at which time it was ascertained that MICHAEL W. SNELGROVE, D.V.M. was present in person and represented by ALVIN WELLS. The Board then proceeded and on the same day, October 1, 1987, all of the above members of said Board being present and participating with the exception of the Secretary of the Board, makes the following findings to-wit:

FINDINGS OF FACT

1.

MICHAEL W. SNELGROVE, D.V.M. is a doctor of veterinary medicine, licensed to practice veterinary medicine in the State of Texas under License Number 6075, 1987 Renewal Certificate Number 3961.
II.
Dr. Snelgrove received notice of this hearing on or about September 23, 1987.

III.
MICHAEL W. SNELGROVE, D.V.M. wrote the following prescriptions for Talwin, aka Pentazocine Hydrochloride, a Schedule IV Controlled Substance, using DEA Narcotics Registration Number AWO963466.

<table>
<thead>
<tr>
<th>QUANTITY</th>
<th>STRENGTH</th>
<th>DATE DISPENSED</th>
<th>Rx NO.</th>
<th>NAME APPEARING ON PRESCRIPTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 cc</td>
<td>30 mg.</td>
<td>March 27, 1987</td>
<td>400048</td>
<td>Michael W. Snelgrove, D.V.M.</td>
</tr>
<tr>
<td>10 cc</td>
<td>30 mg.</td>
<td>March 28, 1987</td>
<td>Refill</td>
<td>&quot;</td>
</tr>
<tr>
<td>10 cc</td>
<td>30 mg.</td>
<td>March 31, 1987</td>
<td>800435</td>
<td>&quot;</td>
</tr>
<tr>
<td>10 cc</td>
<td>30 mg.</td>
<td>April 2, 1987</td>
<td>800529</td>
<td>&quot;</td>
</tr>
<tr>
<td>10 cc</td>
<td>30 mg.</td>
<td>April 6, 1987</td>
<td>Refill</td>
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<td>10 cc</td>
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<td>April 8, 1987</td>
<td>Refill</td>
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<td>10 cc</td>
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<td>April 10, 1987</td>
<td>Refill</td>
<td>&quot;</td>
</tr>
<tr>
<td>10 cc</td>
<td>30 mg.</td>
<td>April 13, 1987</td>
<td>Refill</td>
<td>&quot;</td>
</tr>
<tr>
<td>10 cc</td>
<td>30 mg.</td>
<td>April 15, 1987</td>
<td>Refill</td>
<td>&quot;</td>
</tr>
<tr>
<td>10 cc</td>
<td>30 mg.</td>
<td>April 17, 1987</td>
<td>800971</td>
<td>&quot;</td>
</tr>
<tr>
<td>10 cc</td>
<td>30 mg.</td>
<td>April 21, 1987</td>
<td>Refill</td>
<td>&quot;</td>
</tr>
</tbody>
</table>

IV.
Registration Number AWO963466 is issued by the Drug Enforcement Administration to Dr. James Bowie Woodley.

V.
Dr. James Bowie Woodley has stated that he did not consent to the use of his Narcotics Registration Number by Michael W. Snelgrove, D.V.M. on the occasions listed in Paragraph III.

VI.
MICHAEL W. SNELGROVE, D.V.M. prescribed the Schedule IV Controlled Substances as described in Paragraphs III for medically unsound reasons, in that DR. SNELGROVE prescribed Talwin, in an effort to modify equine behavior during breeding.

VII.
MICHAEL W. SNELGROVE, D.V.M. failed to maintain adequate patient records for the controlled substances described in Paragraph III.
CONCLUSIONS OF LAW

I.

Using Dr. Woodley's Drug Enforcement Administration Narcotics Registration Number to write the prescriptions listed in Paragraph III without Dr. Woodley's consent is illegal and constitutes a violation of the Veterinary Practice Act, Article 7465a, Section 14(c) which states:

Article 7465a, Section 14(c), Veterinary Licensing Act
"... the Board may revoke or suspend a license, place a person whose license has been suspended on probation or reprimand a licensee, ... if it finds that an applicant or licensee:
(c) has engaged in dishonest or illegal practices in or connected with the practice of veterinary medicine."

II.

Using Dr. Woodley's Drug Enforcement Administration Narcotics Registration Number without Dr. Woodley's consent to use the number to write the prescriptions listed in Paragraph III constitutes a violation Article 4475-15, the Texas Controlled Substances Act, and therefore constitutes a violation of Rule 5 of the Rules of Professional Conduct duly promulgated by the Board which states:

Rule 5:
No veterinarian shall render any service or advice involving disloyalty to the law. A veterinarian must also observe and advise his client to observe the statute law.

III.

Using Dr. Woodley's Drug Enforcement Administration Narcotics Registration Number to write the prescriptions listed in Paragraph III constitutes a violation of the Veterinary Practice Act, Article 7465a, Section 14(e) which states:

Article 7465a, Section 14(c), Veterinary Licensing Act
"... the Board may revoke or suspend a license, place a person whose license has been suspended on probation or reprimand a licensee, ... if it finds that an applicant or licensee:
(e) has engaged in practices or conduct in connection with the practice of veterinary medicine which are violative of the standards of professional conduct as duly promulgated by the Board in accordance with the law ..."

IV.

Prescribing Talwin as outlined in Paragraphs III, for purposes other than those for which the drug was designed and therefore for medically unsound reasons constitutes a violation of Rule 33, of the Rules of Professional Conduct which states:
Rules 33:
It shall be unprofessional and a violation of the Rules of Professional Conduct for the veterinary profession for a veterinarian to prescribe, provide, obtain, order, administer, or possess, narcotic drugs, dangerous drugs, or any controlled substances that are not necessary or required for the care of animals, or where the use or possession of such drugs would promote addiction thereto. For purposes of the rule the term Narcotic Drugs, Dangerous Drugs, and Controlled Substances shall mean those which are defined and recognized as such by any law of the State of Texas or of the United States.

V.
Prescribing Schedule IV drugs as outlined in Paragraph III, without maintaining patient records constitutes a violation of Rule 32, of the Rules of Professional Conduct which states:

Rule 32
Individual records will include, but are not limited to, identification of patient, patient history, including immunization records, dates of visits, x-rays, names and dosages of medications administered and/or dispensed, and other details as necessary to substantiate diagnosis and treatment.

Patient records shall be maintained for a period of three (3) years and are the responsibility and property of the employing veterinarian.

VI.
The Texas State Board of Veterinary Medical Examiners has grounds to take disciplinary action against Dr. Snellgrove's veterinary license under the Texas Veterinary Licensing Act, Article 7465a, V.A.T.C.S., Section 7(b) and Sections 14(c) and (e) which state:

Article 7465a, Section 7(b), Veterinary Licensing Act
The Board may require its licensees to maintain a record-keeping system for certain controlled substances prescribed by the Board that includes the quantities and date of purchase, quantities and date dispensed, quantities and date administered, balance on hand, the name and address of the client and patient receiving the drug, and the reason for dispensing or administering the drugs to such patient. The records are subject to review by law enforcement agencies and by representatives of the Board. A failure to keep such records shall be grounds for revoking, cancelling, suspending, or probating the license of any practitioner of veterinary medicine.

Article 7465a, Section 14(c) and (e), Veterinary Licensing Act
"... the Board may revoke or suspend a license, place a person whose license has been suspended on probation or reprimand a licensee, ... if it finds that an applicant or
licensee:
(c) has engaged in dishonest or illegal practices in or con-
ected with the practice of veterinary medicine;
(e) has engaged in practices or conduct in connection with the
practice of veterinary medicine which are violative of the
standards of professional conduct as duly promulgated by the
Board in accordance with the law."

ORDERS

Dr. Snelgrove did not contest the allegations, but instead negotia-
ted a settle-
ment. A majority of the Board voted to accept the Negotiated Settlement (attached) and ORDERED that the Texas Veterinary License No. 6075 heretofore issued to MICHAEL W.
SNELGROVE, D.V.M. by the TEXAS STATE BOARD OF VETERINARY MEDICAL EXAMINERS be and the
same is HEREBY SUSPENDED for a period of five (5) years, all probated but thirty (30)
days. The term of the suspension is effective immediately and the suspension to
commence December 5, 1987 and terminate January 4, 1988. Dr. Snelgrove is to
surrender his DEA and DPS Drug Certificates to be reinstated at the discretion of the
Board. Dr. Snelgrove agrees to pay a civil penalty in the amount of $1,000.00 and
obtain 20 hours of continuing education in equine theriogenology within the first year
of his probationary period. Further Dr. Snelgrove agrees to sit for the State Board
Jurisprudence Examination in Austin no later than sixty (90) days from the date of the
hearing. Further, Dr. Snelgrove agrees to submit to a no-notice drug screen through
the auspices of the TVMA Peer Assistance Program, and if a positive screen is received,
he agrees to immediately enter the TVMA recovery and rehabilitation program. Dr.
Snelgrove is to abide by the laws and rules of the State of Texas as they relate to
the practice of veterinary medicine and submit quarterly progress reports to the Board
certifying compliance with this order. The reports are due on the following dates:

| April 1, 1988 | April 1, 1989 | April 1, 1990 | April 1, 1991 | April 1, 1992 |
| July 1, 1988 | July 1, 1989 | July 1, 1990 | July 1, 1991 | July 1, 1992 |
The foregoing Findings and Orders of the Texas State Board of Veterinary Medical Examiners are ORDERED to be entered as the FINDINGS AND ORDERS of the Board, a quorum and a majority of the members of such Board being present and participating in such hearing, deliberations and decision, and such FINDINGS AND ORDERS are made on the ___ day October, 1987, in Austin, Travis County, Texas.

The Secretary of the Board is hereby ordered to prepare the Board's Findings and Orders in appropriate form and submit to the members of the Board for their signatures and to mail a copy of same to the Respondent at his last known address.

Executed this ___ day of October, 1987.

Ed B. Avery, D.V.M.

ED B. AVERY, D.V.M., President

Edward S. Murray, D.V.M., Vice-President

W. L. "Dub" Anderson, D.V.M., Secretary

Jim E. Humphrey, Member

Mike Levi, Member

Mary E. Mainster, D.V.M., Member

Frank E. Mann, Jr., D.V.M., Member

Fred K. Schifer, D.V.M., Member

October 1, 1987
TEXAS STATE BOARD OF VETERINARY MEDICAL EXAMINERS
1946 South IH-35, Box 113
Austin, TX 78704
(512) 447-1183

DOCKET NUMBER 1987-25 - AMENDED
MICHAEL W. SNELGROVE, D.V.M.
LICENSE NUMBER: 6075

NEGOTIATED SETTLEMENT

This negotiated settlement has been entered by agreement between Dr. Snelgrove, his attorney Alvan N. Wells, Jr. and the Texas State Board of Veterinary Medical Examiners staff in concurrence with the Board Secretary. It is presented to the Board as a recommendation only. If the Board elects to reject or amend this negotiated settlement the defendants Dr. Snelgrove will be granted a continuance at his option.

Dr. Snelgrove does not contest the allegations set forth in the Complaint and agrees that, accordingly, the Board may treat the allegations of fact and law as true, which findings shall have the same force and effect as if evidence and argument were presented in support of the allegations, and based thereon, the Board found the allegations to be true. Respondent understands and intends that by so stating, he is not admitting the truth of the allegations, but is merely agreeing that the Board may enter an Order treating the allegations as true without the necessity of receiving evidence in support thereof.

SUMMARY OF CHARGES:

1. Unauthorized use of another's DEA drug registration number.
2. Dispensing the Scheduled Drug Talwin when not medically indicated.
3. Failure to maintain drug and patient records.

RECOMMENDED DISCIPLINARY ACTION:

1. Five (5) years suspension, effective immediately, all probated but thirty (30) days. The thirty (30) days is effective January 4, 1988
2. Surrender DEA and DPS Drug Certificates to be reinstated at the discretion of the Board.

CONDITIONS:

1. Agree to pay a civil penalty in the amount of one thousand ($1,000) dollars.
2. Obtain twenty (20) hours of continuing education in equine theriogenology.
3. Sit for the State Board Jurisprudence Examination in Austin no later than ninety (90) days from the date of hearing.
4. Submit to a no-notice drug screen through the auspices of the TVMA Peer Assistance Program. If a positive screen is received Dr. Snelgrove will immediately enter the TVMA recovery and rehabilitation program.
5. Submit quarterly progress reports to the Board certifying compliance with this order.

6. Abide by the laws and rules of the State of Texas as they relate to the practice of veterinary medicine.

Michael W. Snelgrove, D.V.M.

Donald B. Wilson, Executive Director
TEXAS BOARD OF VETERINARY MEDICAL EXAMINERS

Witness
Attorney
DOCKETED COMPLAINT NO. 1987-25
TEXAS STATE BOARD OF VETERINARY MEDICAL EXAMINERS

vs.

MICHAEL W. SNELGROVE, D.V.M.

TEXAS VETERINARY MEDICAL LICENSE NO. 6075
1987 RENEWAL CERTIFICATE NUMBER 3961

COMPLAINT AFFIDAVIT FORM

BEFORE ME, the undersigned authority, a Notary Public in and for Texas, on this day personally appeared THOMAS CHESHIRE who after being duly sworn, did depose and say:

"I, THOMAS CHESHIRE being an employee of the Texas Board of Veterinary Medical Examiners, did in the course of such employment, make certain investigations into the professional conduct of one MICHAEL W. SNELGROVE, D.V.M., Hampstead Veterinary Clinic, P. O. Box 615, Hampstead, Waller County, Texas, Texas Veterinary License Number 6075, 1987 Renewal Certificate Number 3961, a practitioner of veterinary medicine in the State of Texas. As an employee of the Texas Board of Veterinary Medical Examiners, I, THOMAS CHESHIRE, do hereby present the following complaint against MICHAEL W. SNELGROVE, D.V.M., who is hereinafter called Respondent.

I.

MICHAEL W. SNELGROVE, D.V.M. wrote the following prescriptions for Talwin, aka Pentazocine Hydrochloride, a Schedule IV Controlled Substance, using DEA Narcotics Registration Number 7WO963466.

<table>
<thead>
<tr>
<th>QUANTITY</th>
<th>STRENGTH</th>
<th>DATE DISPENSED</th>
<th>Rx NO.</th>
<th>NAME APPEARING ON PRESCRIPTION</th>
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<tbody>
<tr>
<td>10 30 cc</td>
<td>30 mg.</td>
<td>March 27, 1987</td>
<td>400048</td>
<td>Michael W. Snelgrove, D.V.M.</td>
</tr>
<tr>
<td>10 30 cc</td>
<td>30 mg.</td>
<td>March 28, 1987</td>
<td>Refill</td>
<td>&quot;</td>
</tr>
<tr>
<td>10 30 cc</td>
<td>30 mg.</td>
<td>March 31, 1987</td>
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<td>30 mg.</td>
<td>April 6, 1987</td>
<td>Refill</td>
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</tr>
<tr>
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<td>30 mg.</td>
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<td>30 mg.</td>
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</tr>
<tr>
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<td>30 mg.</td>
<td>April 13, 1987</td>
<td>Refill</td>
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<tr>
<td>10 30 cc</td>
<td>30 mg.</td>
<td>April 15, 1987</td>
<td>Refill</td>
<td>&quot;</td>
</tr>
<tr>
<td>10 30 cc</td>
<td>30 mg.</td>
<td>April 17, 1987</td>
<td>800971</td>
<td>&quot;</td>
</tr>
<tr>
<td>10 30 cc</td>
<td>30 mg.</td>
<td>April 21, 1987</td>
<td>Refill</td>
<td>&quot;</td>
</tr>
<tr>
<td>330 cc</td>
<td>30 mg.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
II.
Registration Number AWO963466 is issued by the Drug Enforcement Administra-
tion to Dr. James Bowie Woodley.

III.
Dr. James Bowie Woodley has stated that he did not consent to the use of
his Narcotice Registration Number by Michael W. Snelgrove, D.V.M. on the
occasions listed in Paragraph I.

IV.
MICHAEL W. SNELGROVE, D.V.M. prescribed the Schedule IV Controlled
Substances as described in Paragraphs I for medically unsound reasons,
in that DR. SNELGROVE prescribed Talwin, in an effort to modify equine
behavior during breeding.

V.
MICHAEL W. SNELGROVE, D.V.M. failed to maintain patient records for the
controlled substances described in Paragraph I of this complaint.

VI.
Using Dr. Woodley's Drug Enforcement Administration Narcotics Regis-
tration Number to write the prescriptions listed in Paragraph I of this
complaint without Dr. Woodley's consent is illegal and constitutes a
violation of the Veterinary Practice Act, Article 7465a, Section 14(c)
which states:

Article 7465a, Section 14(c), Veterinary Licensing Act
"... the Board may revoke or suspend a license, place a
person whose license has been suspended on probation or repri-
mand a licensee, ... if it finds that an applicant or
licensee:
(c) has engaged in dishonest or illegal practices in or con-
nected with the practice of veterinary medicine.

VII.
Using Dr. Woodley's Drug Enforcement Administration Narcotics Regis-
tration Number without Dr. Woodley's consent to use the number to write the
prescriptions listed in Paragraph I of this complaint constitutes a
violation Article 4475-15, the Texas Controlled Substances Act, and
therefore constitutes a violation of Rule 5 of the Rules of Professional Conduct duly promulgated by the Board which states:

 Rule 5:
 No veterinarian shall render any service or advice involving disloyalty to the law. A veterinarian must also observe and advise his client to observe the statute law.

 VIII.
 Using Dr. Woodley's Drug Enforcement Administration Narcotics Registration Number to write the prescriptions listed in Paragraph I of this complaint constitutes a violation of the Veterinary Practice Act, Article 7465a, Section 14(e) which states:

 Article 7465a, Section 14(c), Veterinary Licensing Act 
 "...the Board may revoke or suspend a license, place a person whose license has been suspended on probation or reprimand a licensee, ... if it finds that an applicant or licensee: (e) has engaged in practices or conduct in connection with the practice of veterinary medicine which are violative of the standards of professional conduct as duly promulgated by the Board in accordance with the law..."

 IX.
 Prescribing Talwin as outlined in Paragraphs I, for purposes other than those for which the drug was designed and therefore for medically unsound reasons constitutes a violation of Rule 33, of the Rules of Professional Conduct which states:

 Rules 33:
 It shall be unprofessional and a violation of the Rules of Professional Conduct for the veterinary profession for a veterinarian to prescribe, provide, obtain, order, administer, or possess, narcotic drugs, dangerous drugs, or any controlled substances that are not necessary or required for the care of animals, or where the use or possession of such drugs would promote addiction thereto. For purposes of the rule the term Narcotic Drugs, Dangerous Drugs, and Controlled Substances shall mean those which are defined and recognized as such by any law of the State of Texas or of the United States.

 X.
 Prescribing Schedule IV drugs as outlined in Paragraph I, without maintaining patient records constitutes a violation of Rule 32, of the Rules of Professional Conduct which states:
Rule 32
Individual records will include, but are not limited to, identification of patient, patient history, including immunization records, dates of visits, x-rays, names and dosages of medications administered and/or dispensed, and other details as necessary to substantiate diagnosis and treatment.

Patient records shall be maintained for a period of three (3) years and are the responsibility and property of the employing veterinarian.

XI.

The Texas State Board of Veterinary Medical Examiners has grounds to take disciplinary action against Dr. Snelgrove's veterinary license under the Texas Veterinary Licensing Act, Article 7465a, V.A.T.C.S., Section 7(b) and Sections 14(c) and (e) which state:

Article 7465a, Section 7(b), Veterinary Licensing Act
The Board may require its licensees to maintain a record-keeping system for certain controlled substances prescribed by the Board that includes the quantities and date of purchase, quantities and date dispensed, quantities and date administered, balance on hand, the name and address of the client and patient receiving the drugs, and the reason for dispensing or administering the drugs to such patient. The records are subject to review by law enforcement agencies and by representatives of the Board. A failure to keep such records shall be grounds for revoking, cancelling, suspending, or probating the license of any practitioner of veterinary medicine.

Article 7465a, Section 14(c) and (e), Veterinary Licensing Act
"... the Board may revoke or suspend a license, place a person whose license has been suspended on probation or reprimand a licensee, ... if it finds that an applicant or licensee:
(c) has engaged in dishonest or illegal practices in or connected with the practice of veterinary medicine;
(e) has engaged in practices or conduct in connection with the practice of veterinary medicine which are violative of the standards of professional conduct as duly promulgated by the Board in accordance with the law."

The foregoing complaint is submitted to the Secretary of the Texas Board of Veterinary Medical Examiners on this the ___ day of September 1987.
Further, Affiant sayeth not.

THOMAS CHERISH, Affiant

SUBSCRIBED and SWORN TO before me by the said THOMAS CHERISH, this the 10th day of September, 1987.

JUDY C. SMITH
Notary Public in and for Texas

The foregoing Complaint is hereby filed and docketed with the Texas State Board of Veterinary Medical Examiners and styled Texas State Board of Veterinary Medical Examiners vs. Michael W. Snelgrove, D.V.M., under Docket Number 1987-25, this the 14th day of September, 1987.

Edward S. Murray, D.V.M.
EDWARD S. MURRAY, D.V.M., Vice-President
Texas State Board of Veterinary Medical Examiners