DOCKETED COMPLAINT NO. 1988-7

TEXAS STATE BOARD OF VETERINARY MEDICAL EXAMINERS

vs.

DOUGLAS S. TRAVER, D.V.M.

TEXAS VETERINARY MEDICAL LICENSE NO. 2220
1987 RENEWAL CERTIFICATE NUMBER 5072

FINDINGS, CONCLUSIONS AND ORDERS OF THE BOARD

On the 4th day of February, 1988, the TEXAS STATE BOARD OF VETERINARY MEDICAL EXAMINERS, being in regular meeting at the Westin Hotel, El Paso, El Paso 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 DOUGLAS TRAVER, 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. W. L. "DUB" ANDERSON, President
MR. JIM F. HUMPHREY, Member
DR. FRED K. SOIFER, Secretary
DR. LARRY M. DUBUISSON, Member
MRS. OLIVIA R. BUDALY, Member
MR. MIKE LEVI, Member
DR. ROBERT D. LEWIS, Member
DR. MARY E. MAINSTER, Member
DR. EDWARD S. MURRAY, Member

of Addison, TX
of Henrietta, TX
of Houston, TX
of Weslaco, TX
of Crowley, TX
of Spicewood, TX
of Elgin, TX
of San Antonio, TX
of Spur, TX

At 9:00 a.m., the appointed hour, the President of the Board, DR. W. L. "DUB" ANDERSON ordered the case to proceed at which time it was ascertained that DOUGLAS TRAVER, D.V.M. was present in person; the Board then proceeded and on the same day, February 4, 1988, 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

I.

DOUGLAS S. TRAVER, D.V.M. is a doctor of veterinary medicine, licensed to practice veterinary medicine in the State of Texas under License Number 2220, 1987 Renewal Certificate Number 5072.
II.

Dr. Traver received notice of this hearing on or about January 9, 1988.

III.

The Respondent has failed to maintain, at his place of business, adequate records on Ritalin aka Methylphenidate Hydrochloride, a Schedule II Controlled Substance, ordered on the following DEA Form 222:

<table>
<thead>
<tr>
<th>QUANTITY</th>
<th>STRENGTH</th>
<th>DATE ORDERED</th>
<th>DATE SHIPPED</th>
<th>ORDER NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>2 x 100</td>
<td>20 mg.</td>
<td>3/19/86</td>
<td>3/28/86</td>
<td>860095340</td>
</tr>
<tr>
<td>1 x 100</td>
<td>20 mg.</td>
<td>4/9/84</td>
<td>4/17/84</td>
<td>N339AD486</td>
</tr>
<tr>
<td>1 x 100</td>
<td>20 mg.</td>
<td></td>
<td>2/3/84</td>
<td>N339AD485</td>
</tr>
<tr>
<td>400</td>
<td>20 mg.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

IV.

On or about October 8, 1987, Tom Cheshire, Investigator, State Board of Veterinary Medical Examiners, inspected the patient records corresponding to the Ritalin described in Finding III and found the Respondent has failed to maintain patient records reflecting the use of this drug.

V.

DOUGLAS S. TRAVER, D.V.M. administered the Ritalin listed in Finding III as a training aid in horses. Utilization of the Ritalin in this manner is not therapeutically indicated and therefore not necessary or needed for the care of the animals.

CONCLUSIONS OF LAW

I.

By failing to maintain adequate records at his place of business for the Schedule II Controlled Substance listed in Finding III, DOUGLAS S. TRAVER, D.V.M. has violated Article 7465a, V.A.C.S., Section 7(b), Veterinary Practice Act which states:

Article 7465a, Section 7(b), Veterinary Practice 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.
II.

By failing to maintain adequate records at his place of business for the Schedule II Controlled Substance listed in Finding III, DOUGLAS S. TRAVER, D.V.M. has violated Rule 30 of the Rules of Professional Conduct which states:

Rule 30 -
Texas veterinarians shall maintain at their place of business records of all drugs listed in Schedule II of 21 Code of Federal Regulation, Part 1300 to end, in their possession. These records shall be maintained for a minimum of five (5) years. The Board shall prescribe a form for keeping records of those Schedule II substances which shall contain the following information:
A. Date of Acquisition
B. Quantity Purchased
C. Date Administered, Dispensed, or Prescribed
D. Quantity Administered, Dispensed, or Prescribed
E. Name of Client and Patient receiving the Drug(s)
F. Diagnosis
G. Balance on Hand

III.

Through failure to maintain adequate patient records to substantiate use of the Controlled Substance listed in Finding III, DOUGLAS S. TRAVER, D.V.M. has violated Rule 32 of the Rules of Professional 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 years and are the responsibility and property of the employing veterinarian.

IV.

By administering the Ritalin listed in Finding III when not necessary or required for the care of animals, DOUGLAS S. TRAVER, D.V.M. has violated Rule 33 of the Rules of Professional Conduct which states:

Rule 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, possess, dispense, give or deliver to or for any person, 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.

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

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; or (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. Traver did not contest the allegations, but, instead, accepted a Negotiated Settlement. A majority of the Board voted to accept the Negotiated Settlement (attached) and Texas Veterinary License No. 2220 heretofore issued to DOUGLAS S. TRAVER, D.V.M. IS HEREBY REPRIMANDED. Dr. Traver is to surrender his Schedule II and IIIN DPS and DEA Certificates to be reinstated at the discretion of the Board. Further, Dr. Traver is to obtain 15 hours of continued education within one year of this Order and submit certification of completion to the Executive Director. In addition, Dr. Traver is to take and pass the State Board Jurisprudence Examination in Austin with 90 days of the hearing and abide by the laws and rules of the State of Texas as they relate to the practice of veterinary medicine.
TEXAS STATE BOARD OF VETERINARY MEDICAL EXAMINERS
1946 South IH-35, Box 113
Austin, TX 78745

DOCKET NUMBER 1988-7
DOUGLAS S. TRAVER, D.V.M.
LICENSE NUMBER: 2220

NEGOTIATED SETTLEMENT

This negotiated settlement has been entered by agreement between Dr. Traver 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 defendant, Dr. Traver will be granted a continuance at his option.

Dr. Traver 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:

Failure to maintain adequate records, and administering controlled substances for non-therapeutic purposes.

RECOMMENDED DISCIPLINARY ACTION:

1. Reprimand

2. Surrender Schedule II and IIN DPS and DEA Certificates to be reinstated at the discretion of the board.

CONDITIONS:

1. Obtain 15 hours of continuing education within one year of the date of this Order and that certification of completion be submitted to the Executive Director.

2. Take and pass the State Board Jurisprudence Exam in Austin within 90 days of this hearing.

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

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

Douglas S. Traver, D.V.M.
Witness
TEXAS STATE BOARD OF VETERINARY MEDICAL EXAMINERS
1946 South IH-35, Box 113
Austin, TX  78745

DOCKET NUMBER 1988-7
DOUGLAS S. TRAVER, D.V.M.
LICENSE NUMBER: 2220

NEGOTIATED SETTLEMENT

This negotiated settlement has been entered by agreement between Dr. Traver 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 defendant, Dr. Traver will be granted a continuance at his option.

Dr. Traver 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:

Failure to maintain adequate records, and administering controlled substances for non-therapeutic purposes.

RECOMMENDED DISCIPLINARY ACTION:

1. Reprimand

2. Surrender Schedule II and IIN DPS and DEA Certificates to be reinstated at the discretion of the board.

CONDITIONS:

1. Obtain 15 hours of continuing education within one year of the date of this Order and that certification of completion be submitted to the Executive Director.

2. Take and pass the State Board Jurisprudence Exam in Austin within 90 days of this hearing.

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

Douglas S. Traver, D.V.M.

Donald B. Wilson, Executive Director
TEXAS BOARD OF VETERINARY MEDICAL EXAMINERS
DOCKETED COMPLAINT NO. 1988-7

TEXAS STATE BOARD OF VETERINARY MEDICAL EXAMINERS vs. DOUGLAS S. TRAVER, D.V.M.

TEXAS VETERINARY MEDICAL LICENSE NO. 2220 1987 RENEWAL CERTIFICATE NUMBER 5072

FINDINGS, CONCLUSIONS AND ORDERS OF THE BOARD

On the 4th day of February, 1988, the TEXAS STATE BOARD OF VETERINARY MEDICAL EXAMINERS, being in regular meeting at the Westin Hotel, El Paso, El Paso 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 DOUGLAS TRAVER, 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. W. L. "DUB" ANDERSON, President of Addison, TX
MR. JIM F. HUMPHREY, Member of Henrietta, TX
DR. FRED K. SOIFER, Secretary of Houston, TX
DR. LARRY M. DUBUSSON, Member of Weslaco, TX
MRS. OLIVIA R. EIDALY, Member of Crowley, TX
MR. MIKE LEVI, Member of Spicewood, TX
DR. ROBERT D. LEWIS, Member of Elgin, TX
DR. MARY E. MAINSTER, Member of San Antonio, TX
DR. EDWARD S. MURRAY, Member of Spur, TX

At 9:00 a.m., the appointed hour, the President of the Board, DR. W. L. "DUB" ANDERSON ordered the case to proceed at which time it was ascertained that DOUGLAS TRAVER, D.V.M. was present in person; the Board then proceeded and on the same day, February 4, 1988, 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

I.

DOUGLAS S. TRAVER, D.V.M. is a doctor of veterinary medicine, licensed to practice veterinary medicine in the State of Texas under License Number 2220, 1987 Renewal Certificate Number 5072.
II.
Dr. Traver received notice of this hearing on or about January 9, 1988.

III.
The Respondent has failed to maintain, at his place of business, adequate records on Ritalin aka Methylphenidate Hydrochloride, a Schedule II Controlled Substance, ordered on the following DEA Form 222:

<table>
<thead>
<tr>
<th>QUANTITY</th>
<th>STRENGTH</th>
<th>DATE ORDERED</th>
<th>DATE SHIPPED</th>
<th>ORDER NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>2 x 100</td>
<td>20 mg.</td>
<td>3/19/86</td>
<td>3/28/86</td>
<td>860095340</td>
</tr>
<tr>
<td>1 x 100</td>
<td>20 mg.</td>
<td>4/9/84</td>
<td>4/17/84</td>
<td>N339AD486</td>
</tr>
<tr>
<td>400</td>
<td>20 mg.</td>
<td>2/3/84</td>
<td>2/3/84</td>
<td>N339AD485</td>
</tr>
</tbody>
</table>

IV.
On or about October 8, 1987, Tom Cheshire, Investigator, State Board of Veterinary Medical Examiners, inspected the patient records corresponding to the Ritalin described in Finding III and found the Respondent has failed to maintain patient records reflecting the use of this drug.

V.
DOUGLAS S. TRAVER, D.V.M. administered the Ritalin listed in Finding III as a training aid in horses. Utilization of the Ritalin in this manner is not therapeutically indicated and therefore not necessary or needed for the care of the animals.

CONCLUSIONS OF LAW

I.
By failing to maintain adequate records at his place of business for the Schedule II Controlled Substance listed in Finding III, DOUGLAS S. TRAVER, D.V.M. has violated Article 7465a, V.A.C.S., Section 7(b), Veterinary Practice Act which states:

Article 7465a, Section 7(b), Veterinary Practice 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 probation the license of any practitioner of veterinary medicine.
II.
By failing to maintain adequate records at his place of business for the Schedule II Controlled Substance listed in Finding III, DOUGLAS S. TRAVER, D.V.M. has violated Rule 30 of the Rules of Professional Conduct which states:

Rule 30 -
Texas veterinarians shall maintain at their place of business records of all drugs listed in Schedule II of 21 Code of Federal Regulation, Part 1300 to end, in their possession. These records shall be maintained for a minimum of five (5) years. The Board shall prescribe a form for keeping records of those Schedule II substances which shall contain the following information:
A. Date of Acquisition
B. Quantity Purchased
C. Date Administered, Dispensed, or Prescribed
D. Quantity Administered, Dispensed, or Prescribed
E. Name of Client and Patient receiving the Drug(s)
F. Diagnosis
G. Balance on Hand

III.
Through failure to maintain adequate patient records to substantiate use of the Controlled Substance listed in Finding III, DOUGLAS S. TRAVER, D.V.M. has violated Rule 32 of the Rules of Professional 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 years and are the responsibility and property of the employing veterinarian.

IV.
By administering the Ritalin listed in Finding III when not necessary or required for the care of animals, DOUGLAS S. TRAVER, D.V.M. has violated Rule 33 of the Rules of Professional Conduct which states:

Rule 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, possess, dispense, give or deliver to or for any person, 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.

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

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; or
(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. Traver did not contest the allegations, but, instead, entered into a Negotiated Settlement. A majority of the Board voted to accept the Negotiated Settlement (attached) and Texas Veterinary License No. 2220 heretofore issued to DOUGLAS S. TRAVER, D.V.M. is HEREBY REPRIMANDED. Dr. Traver is to surrender his Schedule II and IIII DPS and DEA Certificates to be reinstated at the discretion of the Board. Further, Dr. Traver is to obtain 15 hours of continued education within one year of this Order and submit certification of completion to the Executive Director. In addition, Dr. Traver is to take and pass the State Board Jurisprudence Examination in Austin with 90 days of the hearing and abide by the laws and rules of the State of Texas as they relate to the practice of veterinary medicine.
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 4th day February, 1988, in El Paso, El Paso 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 4th day of February, 1988.

[Signatures]

W. L. "Dub" Anderson, D.V.M., President  
February 4, 1988

Jim F. Humphrey, Vice-President

Fred K. Soifer, D.V.M., Secretary

Harry M. Dubuisson, D.V.M., Member

Olivia H. Buday, Member

Mike Devi, Member

Robert D. Lewis, D.V.M., Member

Mary E. Mainster, D.V.M.

Edward S. Murray, D.V.M., Member
DOCKETED COMPLAINT NO. 1988-7

TEXAS STATE BOARD OF VETERINARY MEDICAL EXAMINERS

vs.

DOUGLAS S. TRAVER, D.V.M.

TEXAS VETERINARY MEDICAL LICENSE NO. 2220

1987 RENEWAL CERTIFICATE NUMBER 5072

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 DR. DOUGLAS S. TRAVER, Route 1, Box 53, Poolville, Parker County, Texas, Texas Veterinary License Number 5072, 1987 Renewal Certificate Number 2220, 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 DOUGLAS S. TRAVER, D.V.M., who is hereinafter called Respondent.

I.

The Respondent has failed to maintain, at his place of business, adequate records on Ritalin aka Methylphenidate Hydrochloride, a Schedule II Controlled Substance, ordered on the following DEA Form 222:

<table>
<thead>
<tr>
<th>QUANTITY</th>
<th>STRENGTH</th>
<th>DATE ORDERED</th>
<th>DATE SHIPPED</th>
<th>ORDER NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>2 x 100</td>
<td>20 mg.</td>
<td>3/19/86</td>
<td>3/28/86</td>
<td>860095340</td>
</tr>
<tr>
<td>1 x 100</td>
<td>20 mg.</td>
<td>4/9/84</td>
<td>4/17/84</td>
<td>N339AD486</td>
</tr>
<tr>
<td>1 x 100</td>
<td>20 mg.</td>
<td>4/9/84</td>
<td>2/3/84</td>
<td>N339AD485</td>
</tr>
</tbody>
</table>

400 20 mg.

II.

On or about October 8, 1987, Tom Cheshire, Investigator, State Board of Veterinary Medical Examiners, inspected the patient records corresponding to the Ritalin described in Paragraph I of this complaint and found the Respondent has failed to maintain patient records reflecting the use of this drug.
III.
DOUGLAS S. TRAVER, D.V.M. administered the Ritalin listed in Paragraph I of this complaint as a training aid in horses. Utilization of the Ritalin in this manner is not therapeutically indicated and therefore not necessary or needed for the care of the animals.

IV.
By failing to maintain adequate records at his place of business for the Schedule II Controlled Substance listed in Paragraph I of this Complaint, DOUGLAS S. TRAVER, D.V.M. has violated Article 7465a, V.A.C.S., Section 7(b), Veterinary Practice Act which states:

Article 7465a, Section 7(b), Veterinary Practice 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.

V.
By failing to maintain adequate records at his place of business for the Schedule II Controlled Substance listed in Paragraph I of this Complaint, DOUGLAS S. TRAVER, D.V.M. has violated Rule 30 of the Rules of Professional Conduct which states:

Rule 30 - Texas veterinarians shall maintain at their place of business records of all drugs listed in Schedule II of 21 Code of Federal Regulation, Part 1300 to end, in their possession. These records shall be maintained for a minimum of five (5) years. The Board shall prescribe a form for keeping records of those Schedule II substances which shall contain the following information:
A. Date of Acquisition
B. Quantity Purchased
C. Date Administered, Dispensed, or Prescribed
D. Quantity Administered, Dispensed, or Prescribed
E. Name of Client and Patient receiving the Drug(s)
F. Diagnosis
G. Balance on Hand
VI.

Through failure to maintain adequate patient records to substantiate use of the Controlled Substance listed in Paragraph I of this Complaint, DOUGLAS S. TRAVER, D.V.M. has violated Rule 32 of the Rules of Professional 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 years and are the responsibility and property of the employing veterinarian.

VII.

By administering the Ritalin listed in Paragraph I of this complaint when not necessary or required for the care of animals, DOUGLAS S. TRAVER, D.V.M. has violated Rule 33 of the Rules of Professional Conduct which states:

Rule 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, possess, dispense, give or deliver to or for any person, 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.

VIII.

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

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; or
(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 26th day of December, 1987.

Further, Affiant sayeth not.

THOMAS CHESHIRE, Affiant

SUBSCRIBED and SWORN TO before me by the said THOMAS CHESHIRE, this the 26th day of December, 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. DOUGLAS S. TRAVER, D.V.M. under Docketed Number 1988-7, this the 26th day of December, 1987.

FRED K. SOIFER, D.V.M., Secretary
Texas State Board of Veterinary Medical Examiners