
IN THE MATTER OF THE LICENSE OF § TEXAS STATE BOARD OF
§ ROBERT LOVELL WILSON, D.V.M. § VETERINARY MEDICAL EXAMINERS

AGREED ORDER

On this the 16th day of January, 1999, came on to be considered by the Texas State Board of Veterinary Medical Examiners ("Board"), the matter of the license of Robert Lovell Wilson, D.V.M. ("Respondent" or "Dr. Wilson"), pursuant to the Veterinary Licensing Act ("Act") § 18F and Board Rule 575.27. On August 21, 1997, Respondent appeared in person with his attorney at an Informal Conference in response to a letter of invitation from the Board. The Board was represented at the Informal Conference by the Enforcement Committee.

Respondent, without admitting the truth of the findings and conclusions set out in this Agreed Order, wishes to waive a formal adjudicative hearing and thereby informally dispose of the issues without a formal adjudication. Respondent agrees to comply with the terms and conditions set forth in this Agreed Order. In waiving an adjudicative hearing, Respondent acknowledges understanding of the alleged violations and the adequacy and sufficiency of the notice provided to him.

Upon recommendation of the Enforcement Committee, and with Respondent's consent, the Board makes the following Findings of Fact and Conclusions of Law and enters this Agreed Order as set forth below:

Findings of Fact

1. Robert Lovell Wilson, D.V.M., is a veterinarian licensed by the Board to practice veterinary medicine in the state of Texas under license number 1951, 1998 renewal certificate number 5046. Respondent was subject to prior disciplinary action by the Board.

2. The Board has jurisdiction over the subject matter and Respondent. Respondent has received all notice which may be required by law and by the Board Rules. All jurisdictional requirements have been satisfied.

Docket No. 1997-23

3. On or about September 29, 1995, Ms. Tanya M. James presented her ten month old female, Rottweiler dog "Mugsy," to Dr. Wilson, Animal Clinic of Grand Prairie, Grand Prairie, Texas. The dog had been vomiting.

4. Dr. Wilson failed to maintain complete patient records including the lab results for "Mugsy." The dog's patient records fail to reflect diagnoses, and amounts and dosages of medication administered for the treatment of "Mugsy" between on or about September 29, 1995 and on
or about October 2, 1995. The patient record for "Mugsy" also reflects treatment of a cat named "Theodore."

**Docket No. 1997-24**
5. On or about July 17, 1996, Board investigators inspected the Animal Clinic of Grand Prairie, 614 N. Beltline, Grand Prairie, Texas. The Animal Clinic is owned and operated by Dr. Wilson.

6. On or about that same day, a sample of the patient records of the Animal Clinic of Grand Prairie was inspected. These patient records did not contain the following information:

- medication amounts,
- types and amounts of medication,
- identification of animals,
- patient history,
- vaccination records, and/or
- weights of animals when Equipoise was administered or dispensed for emaciated animals.

7. On or about that same day, the controlled substances records of the Animal Clinic of Grand Prairie were inspected. Dr. Wilson could not produce patient records recording the dispensing or administering of the following amounts of the described controlled substances to animals under the care of, or owned by, Dr. Wilson at Kwik Farms, Route 2, Box 147, Chico, Texas:

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<td>Testosterone Inj./100 mg.</td>
<td>January, 1991 - April, 1993</td>
<td>171.5 cc.</td>
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<td>Winstrol V Tabs./2 mg.</td>
<td>August, 1995 - December, 1995</td>
<td>120 tablets</td>
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<tr>
<td>Winstrol V Tabs./5 mg.</td>
<td>January, 1995</td>
<td>468 tablets</td>
</tr>
<tr>
<td>Equipoise Inj./25 mg.</td>
<td>May, 1993</td>
<td>14 cc.</td>
</tr>
<tr>
<td>Phenobarbital Tabs./½ gr.</td>
<td>March, 1991</td>
<td>350 tablets</td>
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</table>

8. On or about that same day, Dr. Wilson could not produce patient records recording the dispensing or administering of the following amounts of the described controlled substances to animals under the care of Ferd West at Juarez Race Track, 5959 Gateway West, El Paso, Texas:

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<th>Substance</th>
<th>Date Range</th>
<th>Amount</th>
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<tr>
<td>Testosterone Inj./200 mg.</td>
<td>January, 1996</td>
<td>40 cc.</td>
</tr>
<tr>
<td>Equipoise Inj./50 mg.</td>
<td>February, 1995 - February, 1996</td>
<td>150 cc.</td>
</tr>
<tr>
<td>Winstrol V Tabs./5 mg.</td>
<td>January, 1996</td>
<td>1,000 tablets</td>
</tr>
</tbody>
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9. Respondent failed to establish a veterinarian-client-patient relationship with the animals treated prior to dispensing the controlled substances identified in Findings of Fact Nine and Ten.

10. On or about July 17, 1996, Dr. Wilson's controlled substance logs were examined and disclosed that patient names were not recorded when controlled substances were entered in the log as being dispensed.

Docket No. 1997-25
11. On or about December 9, 1996, Richard Palmer presented his seven month old male dachshund dog "Rusty" to Dr. Wilson at the Animal Clinic of Grand Prairie. The dog was presented because he was having problems walking after striking a wall with his head.

12. On or about that same day, Dr. Wilson examined "Rusty." Dr. Wilson diagnosed head tremors, Demodectic mange, and general weakness. Dr. Wilson prescribed the administration of ½ tablet BID of Primidone 250 mg., 1 cc. of Ampicillin, and ½ cc. of Atrophine. Lactated Ringers solution and Dextrose were also prescribed by Dr. Wilson and administered.

13. On or about December 11, 1996, Mr. Palmer again presented "Rusty" to Dr. Wilson, and on this occasion the dog was described as having back problems. Dr. Wilson examined "Rusty" and prescribed Bute tablets, 100 mg., 1 BID.

14. On or about December 17, 1996, Mr. Palmer again presented "Rusty" to Dr. Wilson, and Mr. Palmer told Dr. Wilson that "Rusty" was not getting better. Dr. Wilson examined the dog, and he diagnosed the dog as "shocky." Dr. Wilson prescribed the administration of 10 mg. of Prednisone and 1 cc. of Pen Dex Chlor. Dr. Wilson also diagnosed a low WBC and prescribed the administration of 2 cc. of Acemanin IV and Gentamicin 30 mg.

15. On or about December 18, 1996, and until on or about January 4, 1997, "Rusty" was hospitalized at the Animal Clinic. Dr. Wilson treated the dog during that period with Depo Medro, Gentamicin, Pen Dex Chlor., and fluids.

16. On or about January 5, 1997, "Rusty" was discharged at the request of Mr. Palmer. The dog's condition had not improved during the hospitalization.

17. On or about January 13, 1997, "Rusty" was presented to George E. Martin, Jr., D.V.M., at the Pepper Square Pet Clinic, 14902 Preston Road, Dallas, Texas. Dr. Martin's examination disclosed quadripareis, generalized ataxia, enamel hypoplasia, an irregular heartbeat and agitation. Dr. Martin made a tentative diagnosis of Canine Distemper Encephalitis and referred Mr. Palmer to Douglas Bronstad, D.V.M.
18. On or about January 14, 1997, “Rusty” was presented to Dr. Bronstad at the Animal Diagnostic Clinic, 14075 Waterfall Way, Dallas, Texas. Dr. Bronstad’s examination disclosed severe quadriplegia with upper motor neuron reflexes, persistent paddling of limbs, bilateral menace deficits and severe enamel dysplasia. Dr. Bronstad made a tentative diagnosis of Canine Distemper Encephalitis.

19. On or about January 14, 1997, Mr. Palmer presented “Rusty” to Dr. Wilson for euthanasia because of the Canine Distemper Encephalitis diagnosis.

20. The acts and/or failures to act found in Findings of Fact 11 through 19, and more specifically, the failure to diagnose and treat Canine Distemper Encephalitis, does not constitute the exercise of the same degree of humane care, skill and diligence in treating patients as is ordinarily used in the same or similar circumstances by average members of the veterinary medical profession in good standing in Grand Prairie, Texas or similar community.

Docket No. 1997-26

21. On or about July 19, 1991, search warrants were executed by Federal Agents of the IRS on Dr. Wilson’s place of business at 614 N.E. 8th Street, Grand Prairie, Texas and at his residence. The search of the facility produced business books and records. The search of the residence produced $100 bills and coins found hidden in an air conditioning duct. A review of the business records disclosed unreported income for the year 1989.

22. Dr. Wilson was charged with one count of Subscribing to a False Income Tax Return, in violation of Title 26, United States Code, Section 7206 (1). The penalty for this violation is a $250,000 fine - three (3) years imprisonment, or both such fine and imprisonment, together with the costs of prosecution, a felony.

23. On or about March 28, 1995, a Plea Agreement was signed between Dr. Wilson and the Assistant United States Attorney. Dr. Wilson entered a plea of guilty to a violation of Title 26, United States Code, Section 7206 (1), Subscribing to a False Income Tax Return.

24. On or about March 25, 1996, Dr. Wilson was sentenced by the United States District Court, for the Northern District of Texas, to a one year probated sentence and a fine of $20,000. Further, Dr. Wilson was required to participate in the Home Confinement Program and wear an electronic monitoring device for six months. Dr. Wilson submitted evidence that he had fully complied with all the requirements of the Amended Judgment entered on March 25, 1996 in Criminal Case Number 3:95CR00071-001-G, in the United States District Court for the Northern District of Texas.
Conclusions of Law

1. Respondent is required to comply with the provision of the Act and Board Rules.

2. Section 14 (a) of the Act authorizes the Board to revoke or suspend a license, impose a civil penalty, place a licensee on probation, or reprimand a licensee based upon findings of non-compliance with the Act or Board Rules.

3. Based upon Findings of Fact 3 through 8, Respondent has violated Rule 573.52, Patient Record Keeping, of the Rules of Professional Conduct.


5. Based upon Finding of Fact 10, Respondent has violated Rule 573.50, Controlled Substances Record Keeping for Drugs on Hand, of the Rules of Professional Conduct.

6. Based upon Findings of Fact 7 through 9, Respondent has violated Rule 573.41, Use of Prescription Drugs, of the Rules of Professional Conduct.

7. Based upon Findings of Fact 3 through 20, and Conclusions of Law 3 through 6, Dr. Wilson violated Section 14 (a) (5) of the Veterinary Licensing Act, article 8890 of the Texas Revised Civil Statutes.

8. Based upon Findings of Fact 7 through 9, Dr. Wilson violated Section 14 (a) (12) of the Veterinary Licensing Act, article 8890 of the Texas Revised Civil Statutes.

9. Based upon Findings of Fact 21 through 24, Dr. Wilson violated Section 14 (a) (4) of the Veterinary Licensing Act, article 8890 of the Texas Revised Civil Statutes.

10. Based on any one of the Conclusions of Law Three through Nine, Respondent is subject to disciplinary action by the Board under the Act §14(a).

NOW THEREFORE, THE BOARD AND RESPONDENT AGREE AS FOLLOWS:

Based on the above Findings of Fact and Conclusions of Law, the Board ORDERS that Dr. Wilson’s License to Practice Veterinary Medicine be SUSPENDED for a period of five (5) years, commencing on the date of the Board’s approval of this Agreed Order. The Board further ORDERS that an Administrative Penalty of four thousand dollars ($4,000.00) is assessed against Dr. Wilson, payable within forty-five days (45) of the Board’s approval of this Agreed Order.

With the exception of forty-five (45) days of said license suspension, the suspension is
stayed, and Respondent is placed on Probation for the remainder of the period of suspension, provided that Respondent fully complies with the following terms and conditions of probation:

1. Respondent does not engage in the practice of veterinary medicine as defined in Section 2(2) of the Act during the 45 day period of suspension not stayed, said period to begin on September 1, 1999 and run continuously from that date. During said 45 day period, the performance of administrative duties at a veterinary clinic is not prohibited, provided that Respondent does not perform any of the activities defined in Section 2(2) as the practice of veterinary medicine.

2. Respondent timely remits the Administrative Penalty assessed in this case.

3. During the first two (2) years of the period of probation, Respondent shall submit, on a quarterly basis, copies of ten (10) patient records for animals presented for treatment to Respondent during that quarter. In addition, during the first two years of the period of probation, Respondent shall submit, on a quarterly basis, a copy of one (1) patient record of an animal at Kwik Farms for which Respondent dispensed and/or administered controlled substances during that quarter. Should Respondent cease the practice of veterinary medicine, Condition of Probation Three shall be waived for the period that Respondent no longer practices veterinary medicine, provided that Respondent submits a sworn affidavit to the Board stating that Respondent is not practicing veterinary medicine during that period. This waiver does not include the 45 day period set out in Condition of Probation One.

4. Respondent shall abide by the Rules of Professional Conduct, the Texas Veterinary Licensing Act and the laws of the State of Texas and the United States.

5. Respondent shall cooperate with the Board’s attorneys, investigators, compliance officers and other employees and agents investigating Respondent’s compliance with this order.

Failure to comply with any provision of the terms and conditions of probation shall be grounds for the suspension of Respondent’s license for the remainder of the period of probation from the date that the condition of probation was violated.

Respondent, Robert Lovell Wilson, D.V.M., by signing this Agreed Order, acknowledges his understanding of the Agreed Order, the notice, Findings of Fact and Conclusions of Law herein set forth, and agrees that he will satisfactorily comply with the mandates of the Agreed Order in a timely manner or be subject to appropriate disciplinary action of the Board.

Respondent, Robert Lovell Wilson, D.V.M., by signing this Agreed Order, waives his right to a formal hearing and any right to seek judicial review of this Agreed Order. Respondent acknowledges that he is represented by counsel.
RESPONDENT WAIVES ANY FURTHER HEARINGS OR APPEALS TO THE BOARD OR TO ANY COURT IN REGARD TO ALL TERMS AND CONDITIONS OF THIS AGREED ORDER. NOTHING IN THIS ORDER SHALL BE DEEMED A WAIVER OF RESPONDENT'S RIGHTS UNDER STATUTE, OR UNDER THE UNITED STATES OR TEXAS CONSTITUTIONS TO APPEAL AN ORDER OR ACTION OF THE BOARD SUBSEQUENT TO THIS AGREED ORDER EXCEPT AS RESPONDENT MAY HAVE OTHERWISE AGREED TO HEREIN. RESPONDENT AGREES THAT THIS IS A FINAL ORDER.

The date of this Agreed Order shall be the date it is adopted by the Texas State Board of Veterinary Medical Examiners.

I, ROBERT LOVELL WILSON, D.V.M., HAVE READ AND UNDERSTAND THE FOREGOING AGREED ORDER. I UNDERSTAND THAT BY SIGNING IT, I WAIVE CERTAIN RIGHTS. I SIGN IT VOLUNTARILY. I UNDERSTAND THIS ORDER CONTAINS THE ENTIRE AGREEMENT AND THERE IS NO OTHER AGREEMENT OF ANY KIND, VERBAL, WRITTEN OR OTHERWISE.

Robert Lovell Wilson, D.V.M.
Respondent

DATE

STATE OF TEXAS  
COUNTY OF Dallas

BEFORE ME, on this day, personally appeared Robert L. Wilson, D.V.M., known to me to be the person whose name is subscribed to the foregoing Agreed Order, and acknowledged to me that he executed the same for the purposes stated therein.

Given under the hand and seal of office this 1st day of March, 1999.

Notary Public
This agreed order has been entered between Robert Lovell Wilson, D.V.M., and Ron Allen, the Executive Director of the Texas State Board of Veterinary Medical Examiners, in concurrence with the Board Secretary. It is presented to the Board as a recommendation only.

RON ALLEN
Executive Director, TSBVME

3/5/1999
DATE

SIGNED AND ENTERED by the TEXAS STATE BOARD OF VETERINARY MEDICAL EXAMINERS on this the 11th day of June, 1999.

ROBERT I. HUGHES, JR., D.V.M.
President

TEXAS STATE BOARD OF VETERINARY § TEXAS VETERINARY MEDICAL
MEDICAL EXAMINERS § LICENSE NO. 1951
vs. § 1999 RENEWAL CERTIFICATE
ROBERT L. WILSON, D.V.M. § NUMBER 1936

Before me, the undersigned authority, a Notary Public in and for Texas, on this day personally appeared Peter Hartline, who after being duly sworn, did depose and say:

On or about March 14, 1996, Peter Hartline, being an employee of the Texas State Board of Veterinary Medical Examiners, did in the course of such employment, make certain investigations into the professional conduct of one Robert L. Wilson, D.V.M., Animal Clinic of Grand Prairie, 614 North Beltline Road, Grand Prairie, Texas, 75050, Veterinary License Number 1951, 1999 Renewal Certificate Number 1936., a practitioner of veterinary medicine in the State of Texas. As an employee of the Texas State Board of Veterinary Medical Examiners, I Peter Hartline, do hereby present the following complaint against Robert L. Wilson, D.V.M.

I.

Docket No. 1997-23
On or about September 29, 1995, Ms. Tanya M. James presented her ten month old female, Rottweiler dog "Mugsy," to Dr. Wilson, Animal Clinic of Grand Prairie, Grand Prairie, Texas. The dog had been vomiting.

II.

Dr. Wilson failed to maintain complete patient records including the lab results for "Mugsy." The dog's patient records fail to reflect diagnoses, and amounts and dosages of medication administered for the treatment of "Mugsy" between on or about September 29, 1995 and on or about October 2, 1995. The patient record for "Mugsy" also reflects treatment of a cat named "Theodore."

III.

Docket No. 1997-24
On or about July 17, 1996, Board investigators inspected the Animal Clinic of Grand Prairie, 614 N. Beltline, Grand Prairie, Texas. The Animal Clinic is owned and operated by Dr. Wilson.
IV.

On or about that same day, a sample of the patient records of the Animal Clinic of Grand Prairie was inspected. These patient records did not contain the following information:

- medication amounts,
- types and amounts of medication,
- identification of animals,
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- weights of animals when Equipoise was administered or dispensed for emaciated animals.

V.

On or about that same day, the controlled substances records of the Animal Clinic of Grand Prairie were inspected. Dr. Wilson could not produce patient records recording the dispensing or administering of the following amounts of the described controlled substances to animals under the care of, or owned by, Dr. Wilson at Kwik Farms, Route 2, Box 147, Chico, Texas:

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Robert L. Wilson, DVM  
Docket Nos. 1997-23 - 24 - 25 - 26  
Page 3

VII.

Respondent failed to establish a veterinarian-client-patient relationship with the animals treated prior to dispensing the controlled substances identified in Paragraphs V and VI.

VIII.

On or about July 17, 1996, Dr. Wilson’s controlled substance logs were examined and disclosed that patient names were not recorded when controlled substances were entered in the log as being dispensed.

IX.

Docket No. 1997-25

On or about December 9, 1996, Richard Palmer presented his seven month old male dachshund dog “Rusty” to Dr. Wilson at the Animal Clinic of Grand Prairie. The dog was presented because he was having problems walking after striking a wall with his head.

X.

On or about that same day, Dr. Wilson examined “Rusty.” Dr. Wilson diagnosed head tremors, Demodectic mange, and general weakness. Dr. Wilson prescribed the administration of ½ tablet BID of Primidone 250 mg., 1 cc. of Ampicillin, and ½ cc. of Atrophine. Lactated Ringers solution and Dextrose were also prescribed by Dr. Wilson and administered.

XI.

On or about December 11, 1996, Mr. Palmer again presented “Rusty” to Dr. Wilson, and on this occasion the dog was described as having back problems. Dr. Wilson examined “Rusty” and prescribed Bute tablets, 100 mg., 1 BID.

XII.

On or about December 17, 1996, Mr. Palmer again presented “Rusty” to Dr. Wilson, and Mr. Palmer told Dr. Wilson that “Rusty” was not getting better. Dr. Wilson examined the dog, and he diagnosed the dog as “shocky.” Dr. Wilson prescribed the administration of 10 mg. of Prednisone and 1 cc. of Pen Dex Chlor. Dr. Wilson also diagnosed a low WBC and prescribed the administration of 2 cc. of Acemanin IV and Gentamicin 30 mg.
XIII.

On or about December 18, 1996, and until on or about January 4, 1997, “Rusty” was hospitalized at the Animal Clinic. Dr. Wilson treated the dog during that period with Depo Medro, Gentamicin, Pen Dex Chlor., and fluids.

XIV.

On or about January 5, 1997, “Rusty” was discharged at the request of Mr. Palmer. The dog’s condition had not improved during the hospitalization.

XV.

On or about January 13, 1997, “Rusty” was presented to George E. Martin, Jr., D.V.M., at the Pepper Square Pet Clinic, 14902 Preston Road, Dallas, Texas. Dr. Martin’s examination disclosed quadriaparesis, generalized ataxia, enamel hypoplasia, an irregular heartbeat and agitation. Dr. Martin made a tentative diagnosis of Canine Distemper Encephalitis and referred Mr. Palmer to Douglas Bronstad, D.V.M.

XVI.

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XVII.

On or about January 14, 1997, Mr. Palmer presented “Rusty” to Dr. Wilson for euthanasia because of the Canine Distemper Encephalitis diagnosis.

XVIII.

The acts and/or failures to act found in Paragraphs IX and through XVII, and more specifically, the failure to diagnose and treat Canine Distemper Encephalitis, does not constitute the exercise of the same degree of humane care, skill and diligence in treating patients as is ordinarily used in the same or similar circumstances by average members of the veterinary medical profession in good standing in Grand Prairie, Texas or similar community.
XIX.

Docket No. 1997-26
On or about July 19, 1991, search warrants were executed by Federal Agents of the IRS on Dr. Wilson's place of business at 614 N.E. 8th Street, Grand Prairie, Texas and at his residence. The search of the facility produced business books and records. The search of the residence produced $100 bills and coins found hidden in an air conditioning duct. A review of the business records disclosed unreported income for the year 1989.

XX.

Dr. Wilson was charged with one count of Subscribing to a False Income Tax Return, in violation of Title 26, United States Code, Section 7206 (1). The penalty for this violation is a $250,000 fine - three (3) years imprisonment, or both such fine and imprisonment, together with the costs of prosecution, a felony.

XXI.

On or about March 28, 1995, a Plea Agreement was signed between Dr. Wilson and the Assistant United States Attorney. Dr. Wilson entered a plea of guilty to a violation of Title 26, United States Code, Section 7206 (1), Subscribing to a False Income Tax Return.

XXII.

On or about March 25, 1996, Dr. Wilson was sentenced by the United States District Court, for the Northern District of Texas, to a one year probated sentence and a fine of $20,000. Further, Dr. Wilson was required to participate in the Home Confinement Program and wear an electronic monitoring device for six months. Dr. Wilson submitted evidence that he had fully complied with all the requirements of the Amended Judgment entered on March 25, 1996 in Criminal Case Number 3:95CR00071-001-G, in the United States District Court for the Northern District of Texas.

XXIII.

Respondent is required to comply with the provisions of the Act and Board. The Board has jurisdiction over the subject matter and Respondent. Respondent has received all notice which may be required by law and by Board Rules. All jurisdictional requirements have been satisfied.

XXIV.

Section 14 (a) of the Act authorizes the Board to revoke or suspend a license, impose a civil penalty, place a licensee on probation, or reprimand a licensee based upon findings of non-compliance with the Act or Board Rules.
XXV.

Subsections 14 (a) (4), (5) and (12) authorize the Board to take the above stated disciplinary action if the licensee:

(4) has been convicted of a felony under the laws of this or any other state of the United States or of the United States;

... (5) 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 law;

... (12) has ordered prescription drugs or controlled substances for the treatment of an animal without first establishing a valid veterinarian-patient-client relationship;

XXVI.

Based on paragraph VIII, Dr. Wilson has violated Rule 573.50 - Controlled Substance Record Keeping for Drugs on Hand, of the Rules of Professional Conduct.

XXVII.

Based upon paragraphs I through VI, Respondent has violated Rule 573.52, Patient Record Keeping, of the Rules of Professional Conduct.

XXVIII.

Based upon paragraphs IX through XVIII, Respondent has violated Rule 573.22, Professional Standard of Humane Treatment, of the Rules of Professional Conduct.

XXIX.

Based upon paragraphs V through VII, Respondent has violated Rule 573.41, Use of Prescription Drugs, of the Rules of Professional Conduct.

XXX.

Based on paragraphs I through XVIII, Dr. Wilson has also violated Section 14 (a) (5) of the Veterinary Licensing Act, article 8890.
Robert L. Wilson, DVM  
Docket Nos. 1997- 23 - 24 - 25 - 26  
Page 7

XXXI.

Based on paragraphs V through VII, Dr. Wilson has also violated Section 14 (a) (12) of the Veterinary Licensing Act, article 8890.

XXXII.

Based on paragraphs XIX through XXII, Dr. Wilson has also violated Section 14 (a) (4) of the Veterinary Licensing Act, article 8890.

The foregoing complaint is submitted to the Secretary of the Texas Board of Veterinary Medical Examiners on this the ___day of ___September___ 1999.

Further, Affiant sayeth not.

__________________________
Peter Hartline, Affiant

SUBSCRIBED and SWORN TO before me by the said Peter Hartline, this the ___16th___ day of ___September___, 1999.

__________________________
Charles Adkins, 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. Robert L. Wilson, D.V.M. under Docketed Numbers 1997-23, 1997-24, 1997-25, 1997-26, this the ___22___ day of ___September___ 1999.

__________________________
Lynn Lawhon, DVM, Board Secretary  
Texas State Board of Veterinary Medical Examiners