

BEFORE ME, a Notary Public in and for Travis County, Texas, on this day personally appeared ERNIE M. CARROLL, who after being by me duly sworn upon oath deposes and says that:

The said ERNIE M. CARROLL, being an employee of THE TEXAS STATE BOARD OF VETERINARY MEDICAL EXAMINERS, did in the course of his employment make certain investigations into the professional conduct of one DR. STEVEN LLOYD BETTON, Texas Veterinary License No. 3374, 1979-80 Renewal Certificate No. 2912, a practitioner of veterinary medicine in the State of Texas, and in the course of said investigation it has come to the attention of the said ERNIE M. CARROLL that on or about the dates hereinafter specified that the said DR. STEVEN LLOYD BETTON did commit one or more of the following acts and/or omissions, or a combination thereof or all of same, said acts and/or omissions being in violation of Article 7465a of the Civil Statutes of Texas, V.A.T.S. and within the contemplation of Section 14 of said statute, and the Rules of Professional Conduct duly adopted according to law, to-wit:

1. That on or about June 2, 1979, MR. E. T. BARNETT who resided at 3501 Princeton in Midland, Midland County, Texas, presented two (2) half Beagle dogs, "Patches" and "Muffin" to DR. STEVEN LLOYD BETTON, at his Clinic at F.M. 868 in Midland, Midland County, Texas to be boarded, leaving his son's name, address and telephone number for use in case of an emergency.

On or about June 11, 1979, MRS. REBA BARNETT and her daughter TRICIA BARNETT went to DR. BETTON's Clinic to pick up her two dogs. At this time, DR. BETTON in a very irrational and emotional state, verbally abused MRS. BARNETT and daughter, TRICIA BARNETT, addressing abusive and profane language to them. Said actions being in violation of Section 14(e), V.A.T.S. and Rules 4, 5, 11 and 18 of the Rules of Professional Conduct duly promulgated by the Board in accordance with law.

2. Upon insisting that DR. BETTON deliver her dogs to her, he obtained Muffin from the kennel room, carried her to the front door, where Muffin urinated and defecated. DR. BETTON obviously became enraged and threw Muffin out of the door onto the parking lot without a leash or other form of restraint. Said actions being in violation of Section 14(e), V.A.T.S. and Rules No. 4, 11 and 18 of the Rules of Professional Conduct duly promulgated by the Board in accordance with law.

3. That when DR. BETTON went to the kennel room and brought Patches to MRS. BARNETT, Patches was very cowed and frightened, at which time DR. BETTON screamed profanities at MRS. BARNETT. Said acts being in violation of Section 14(e), V.A.T.S. and Rules of Professional Conduct No. 4, 5, 11 and 18, duly promulgated by the Board in accordance with law.

4. At the time DR. BETTON returned the two dogs to MRS. BARNETT, they were very filthy, frightened and emaciated in violation of Section 14(e), V.A.T.S. and Rules of Professional Conduct No. 4, 11 and 18 duly promulgated by the Board in accordance with law.

5. At the time of presentation, DR. BETTON quoted the BARNETT's a price of \$8.00 per day for the two dogs for a total of \$72.00 for nine (9) days boarding. At the time DR. BETTON presented MRS. BARNETT with her bill he informed her he had charged her \$18.00 more for the boarding than originally agreed, because of the "extra care they required". MRS. BARNETT paid the amount billed in order to secure possession of her pets. Said acts being in violation of Section 14 (e), V.A.T.S. and Rules of Professional Conduct No. 4, 11 and 19, duly promulgated by the Board in accordance with law.

6. That on two different occasions the said DR. STEVEN LLOYD BETTON failed to respond to letters of inquiry from the TEXAS STATE BOARD OF VETERINARY MEDICAL EXAMINERS requesting information with regards to the complaint submitted by MRS. REBA BARNETT.

The above complaint, containing six (6) counts, is submitted to the Executive Secretary of the Texas State Board of Veterinary Medical Examiners this the 4TH day of JANUARY A.D., 1980.

Ernie M. Carroll
ERNIE M. CARROLL

THE STATE OF TEXAS X
COUNTY OF TRAVIS X

SWORN AND SUBSCRIBED TO BEFORE ME BY ERNIE M. CARROLL, this the 4th day of January, A.D. 1980, to certify which witness my hand and seal of office.

Ora Lee Lindholm
ORA LEE LINDHOLM
Notary Public in and for Travis
County Texas

TEXAS STATE BOARD OF
VETERINARY MEDICAL EXAMINERS

TEXAS VETERINARY MEDICAL
LICENSE NUMBER 3374

VS

TEXAS VETERINARY MEDICAL
RENEWAL CERTIFICATE (1979)
NUMBER 2912

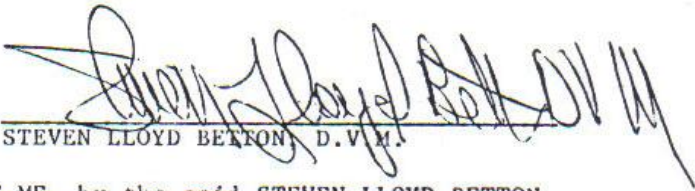
STEVEN LLOYD BETTON, D.V.M.

WAIVER OF CITATION AND ACCEPTANCE OF SERVICE

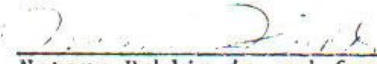
Now comes, STEVEN LLOYD BETTON, D.V.M., hereinafter called Defendant, Defendant in the above numbered and entitled cause and hereby acknowledges receipt of Plaintiff's petition in the form of a sworn complaint which is filed in the above numbered and entitled cause and a copy of which is attached hereto.

The said STEVEN LLOYD BETTON, D.V.M. further acknowledges that he has read the sworn complaint and understands the allegations contained therein, and hereby accepts service of process in said above numbered and entitled cause and waives the issuance, service and return of citation on said Defendant in said cause. The said STEVEN LLOYD BETTON, D.V.M. further agrees that this waiver and acceptance shall have the same force and effect as if citation had been duly issued, served and returned as provided by law on said Defendant in said cause, and hereby agrees that the said above numbered and entitled cause may be heard at 2:00 P.M. on Monday, the 4th day of February, A.D., 1980, the hearing to be held at the Shamrock Hilton, Main & Holcomb Streets, Houston, Harris County, Texas, without further notice to the said STEVEN LLOYD BETTON, D.V.M., and that this waiver of citation shall constitute the general appearance of the said STEVEN LLOYD BETTON, D.V.M. in said above numbered and entitled cause.

WITNESS MY HAND this the 2nd day of January, A.D., 1980.


STEVEN LLOYD BETTON, D.V.M.

SWORN TO AND SUBSCRIBED BEFORE ME, by the said STEVEN LLOYD BETTON, D.V.M. on this the 2nd day of January, A.D., 1980.


Notary Public in and for
Travis County, Texas

Joyce Fields