

BEFORE THE BOARD OF VETERINARY MEDICAL EXAMINERS
IN AND FOR THE STATE OF TEXAS

IN THE MATTER OF REINSTATEMENT OF WARNER A. DUNN, D.V.M.

LICENSE NUMBER 1611 - SURRENDERED ON JUNE 7, 1990

FINDINGS, CONCLUSIONS AND ORDERS OF THE BOARD

On the 21st day of June, 1991, the TEXAS STATE BOARD OF VETERINARY MEDICAL EXAMINERS, being in regular meeting at the Wyndham Hotel, 4140 Governor's Row, Austin, Travis County, Texas, to determine whether cause exists under Article 8890, Revised Civil Statutes of Texas, to reinstate License Number 1611 heretofore issued to Warner A. Dunn, D.V.M. pursuant to Texas law.

At the hearing, Robert D. Lewis, D.V.M., President of the Board presided and Mary E. Mainster, D.V.M. was recused from voting. The following members were present:

Dr. Robert D. Lewis, President	of Elgin, TX
Dr. Mary E. Mainster, Vice President	of San Antonio, TX
Dr. Guy A. Sheppard, Secretary	of San Angelo, TX
Dr. Larry M. Dubuisson, Member	of Weslaco, TX
Ms. Olivia Eudaly, Member	of Fort Worth, TX
Dr. Alton F. Hopkins, Jr., Member	of Dallas, TX
Mr. Mike Levi, Member	of Spicewood TX
Mr. Clark S. Willingham, Member	of Dallas, TX

The Texas State Board of Veterinary Medical Examiners was represented by Jennifer S. Riggs, Assistant Attorney General. The Respondent was present but was not represented by legal counsel, despite having been notified of his rights regarding same. Testimony and other evidence was received by the Board and, as a result thereof, the Board makes the following Findings of Fact and Conclusions of Law.

FINDINGS OF FACT

I.

Notice of Hearing on his Petition for reinstatement was served on Warner A. Dunn, D.V.M., on June 6, 1991.

II.

Warner A. Dunn, D.V.M., hereinafter referred to as "Respondent" is not currently licensed to practice veterinary medicine in the State of Texas.

III.

Respondent's license to practice veterinary medicine was surrendered, in lieu of a hearing on Docketed Complaint 1990-07, on June 7, 1990.

IV.

Respondent petitioned the Board for reinstatement of his license.

V.

Respondent produced only his testimony regarding his general desire to resume the practice of veterinary medicine in support of his petition, and his assertion that he would not violate the Veterinary Practice Act.

VI.

One year away from practice is insufficient to counter the charges at issue.

CONCLUSIONS OF LAW

I.

Neither Article 6252-13a, Texas Revised Civil Statutes, Annotated, nor Article 8890, Texas Revised Civil Statutes, Annotated, requires that the Board provide Respondent with a hearing on his Petition for Reinstatement.

II.

Respondent, by submitting a Petition for Reinstatement, requested and consented to the Board's exercise of jurisdiction over his petition.

III.

Respondent failed to show cause why his license could, or should, be reinstated or why he should be allowed to re-apply.

IV.

Respondent failed to show that he is entitled to licensure under Article 8890.

ORDERS

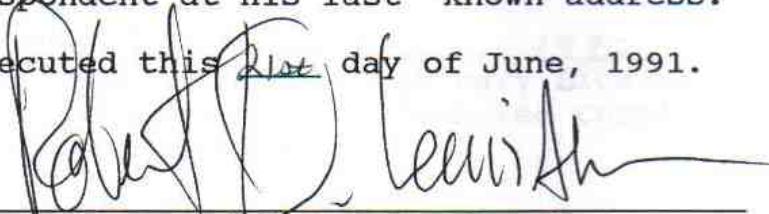
It is therefore ORDERED that License Number 1611 heretofore issued to WARNER A. DUNN, D.V.M. by the TEXAS BOARD OF VETERINARY MEDICAL EXAMINERS shall not be reinstated.

It is further ORDERED that all Findings of Fact herein, that could be deemed Conclusions of Law, and all Conclusions of Law that could be deemed Findings of Fact, are hereby adopted as such.

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 21st day June, 1991, 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 21st day of June, 1991.


Robert D. Lewis, D.V.M., President


6-21-91
Date


Mary E. Mainster, D.V.M., Vice-President

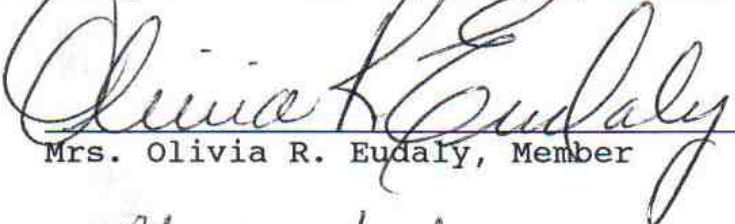
6/21/91
Date


Guy A. Sheppard, D.V.M., Secretary

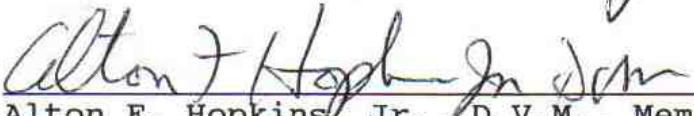
6/21/91
Date


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

6/21/91
Date


Mrs. Olivia R. Eudaly, Member

6/21/91
Date


Alton F. Hopkins, Jr., D.V.M., Member

6/21/91
Date


Mr. Mike Levi, Member

6/21/91
Date

Absent
Fred K. Soifer, D.V.M., Member

Date


Mr. Clark S. Willingham, Member

6/21/91
Date

INDINGS AND ORDERS OF THE BOARD

TEXAS STATE BOARD OF VETERINARY	()	TEXAS
MEDICAL EXAMINERS	()	VETERINARY
VS.	()	LICENSE
<u>Warner A. Dunn</u> D.V.M.	()	NUMBER <u>1611</u>

BOARD ORDER ACCEPTING LICENSE FOR SURRENDER AND CANCELLATION

On the 7th day of June, 1990, Dr. Warner A. Dunn voluntarily surrendered Texas Veterinary License Number 1611 for cancellation in lieu of a hearing on Docketed Complaint 1990-07, as set forth in the attached affidavit.

On the 7th day of June, 1990, the attached affidavit was presented to the Board for acceptance. Accordingly, the Board accepted Texas Veterinary License Number 1611, previously issued to Dr. Warner A. Dunn, for surrender, and ordered License Number 1611 cancelled.

EXECUTED this the 7th day of June, 1990.

Fred K. Soifer, DVM
FRED K. SOIFER, D.V.M.
PRESIDENT

Alton F. Hopkins, Jr., DVM
ALTON F. HOPKINS, JR., D.V.M.
MEMBER

Robert D. Lewis, DVM
ROBERT D. LEWIS, D.V.M.
VICE-PRESIDENT

Absent
MIKE LEVI
MEMBER

Mary E. Mainster, DVM
MARY E. MAINSTER, D.V.M.
SECRETARY

Guy A. Sheppard, DVM
GUY A. SHEPPARD, D.V.M.
MEMBER

Larry M. Dubuisson, DVM
LARRY M. DUBUISSON, D.V.M.
MEMBER

Clark S. Willingham
CLARK S. WILLINGHAM
MEMBER

Absent
OLIVIA R. EUDALY
MEMBER

STATE OF TEXAS)

COUNTY OF)

BEFORE ME, the undersigned notary public, on this day personally appeared Warner A. Dunn, D.V.M., located at 2112 South Street, Waco, Texas, County, Texas, who after being duly sworn, upon oath, deposed and said;

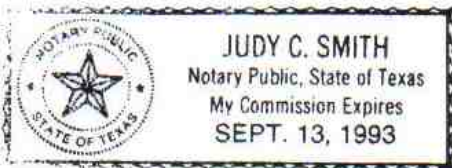
I, Warner A. Dunn, holder of Texas Veterinary License Number 1611, after conferring with DONALD B. WILSON, Executive Director, Texas Board of Veterinary Medical Examiners, voluntarily state as follows:

I hereby request that the Texas State Board of Veterinary Medical Examiners accept this voluntary surrender of my veterinary license in lieu of a hearing on Docketed Complaint 1990-01. 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.

Warner A. Dunn, D.V.M.
WARNER A. DUNN, D.V.M.

SUBSCRIBED and SWORN to by the said Warner A. Dunn, D.V.M., before me, on this the 7th day of June, 1990, to certify which, witness my hand and seal of office.

Judy C. Smith
Notary Public in and for Texas



DOCKETED COMPLAINT NO. 1990-07

TEXAS STATE BOARD OF VETERINARY	()	TEXAS VETERINARY MEDICAL
MEDICAL EXAMINERS	()	LICENSE NO. 1611
vs.	()	1990 RENEWAL CERTIFICATE
WARNER A. DUNN, D.V.M.	()	NUMBER 0101

COMPLAINT AFFIDAVIT FORM

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

On or about March 13, 1989, Joseph J. Rizzo, 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 WARNER A. DUNN, D.V.M., Nacogdoches Animal Hospital, 2112 South Street, Nacogdoches, Nacogdoches County, Texas, Veterinary License Number 1611, 1990 Renewal Certificate Number 0101, a practitioner of veterinary medicine in the State of Texas. As an employee of the Texas Board of Veterinary Medical Examiners, I, Joseph J. Rizzo, do hereby present the following complaint against WARNER A. DUNN, D.V.M., who is hereinafter called Respondent.

I.

The Respondent planted, cultivated, harvested and distributed marijuana, a Schedule I Controlled Substance, from 1980 through 1986 in Nacogdoches County, Texas and that he utilized his Veterinary Clinic in Nacogdoches, Texas to distribute the illegal drug during that time period.

II.

From 1980 to 1986, the Respondent delivered Schedule II, III and IV Controlled Substances to Sheila (Dunn) Burroughs, Glenn Burroughs, Zelda Darlene Rogers aka Darlene Crouch and other individuals, not for use in animals, and utilized his Texas license, number 1611, and his veterinary clinic in Nacogdoches, Texas to order and distribute the drugs.

III.

The Respondent continuously administered Schedule II, III and IV Controlled Substances to his former wife, Sheila (Dunn) Burroughs, during the calendar year of 1987. Those Controlled Substances include Morphine (II), Meperidine (II), Sodium Pentobarbital (II), Acetaminophen w/codeine (III) and Pentazocine lactate (IV) and others. Respondent also failed to maintain records relating to the administration of such Controlled Substances.

IV.

That Dr. Warner A. Dunn continuously administered Schedule II Controlled Substances to his employee, Zelda Darlene Rogers aka Darlene Crouch, during the calendar year of 1987. Those Controlled Substances

include Morphine (II) and Meperidine (Demerol) (II). Respondent also failed to maintain records relating to the administration of such Controlled Substances.

V.

That in the calendar year of 1987, Dr. Warner A. Dunn ordered and received the following Controlled Substances from the Interstate Drug Exchange in Amityville, New York: (Month and Year Indicated)

<u>Schedule Drug</u>	<u>Amount</u>	<u>Time Period</u>
II Meperidine	620 cc	Jan. thru Aug., 1987
II Meperidine	500 tabs	Jan. thru Aug., 1987
II Morphine	220 cc	March thru July, 1987
II Sod. Pentobarbital	1,100 caps	March thru Sept., 1987
III Acetaminophen w/codeine	2,400 tabs	Jan. thru Dec., 1987
IV Mephentermine	6,200 caps	Jan. thru Sept., 1987
IV Diazepam	3,200 tabs	March thru Dec., 1987
IV Librium	500 caps	April 8, 1987
IV Meproamate	2,000 tabs	July thru Nov., 1987
IV Temazepam	100 caps	January 8, 1987
IV Triazolam	200 tabs	August 5, 1987
IV Pemoline	100 tabs	September 10, 1987
IV Talwin	120 cc	June thru Sept., 1987
V Promethazine w/codeine	1 Pint	September 10, 1987
V Phenergan w/codeine	1 Quart	Jan. thru March, 1987
Total of Tabs and Caps of Schedules III and IV:		14,700
Total of Tabs and Caps of Schedule II:		<u>1,600</u>
Total		16,300
Total of Sched. V Promethazine w/codeine:		1,500 cc's (1 pt)
Total of Schedule V Phenergan w/codeine:		1 quart
Total of Injectables:		
Morphine & Meperidine (II)		840 cc's
Talwin (IV)		<u>120 cc's</u>
Total		960 cc's

When interviewed on February 13 and 14, 1990, by Investigator Joseph J. Rizzo, the Respondent furnished drug accountability records for the above listed drugs that indicated that during the calendar year of 1987, the Respondent dispensed or administered 46 cc's of Meperidine, 60 cc's of Morphine and 190 Capsules of Sodium Pentobarbital. The Respondent was unable to account for 574 cc of Meperidine; 160 cc of Morphine and 910 capsules of Sodium Pentobarbital, all Schedule II drugs. Further, the Respondent could not account for any of the Schedule III, IV and V controlled substances listed above, the accountability of which is required by Section 13.28(d) of the Texas Controlled Substances Act Rules and by Section 4.08(3) of the Texas Controlled Substances Act, Article 4476-15, V.A.C.S.

VI.

By engaging in the activity of planting, cultivating, harvesting and distributing marijuana, as described in Paragraph I, Respondent has

violated Rules 5 and 28 of the Rules of Professional Conduct (Revised 1/81 and 8/82), which state:

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.

Rule 28

It is unprofessional conduct for a licensed veterinarian to prescribe or dispense, deliver or order delivered any controlled substance without first having established a patient/veterinarian relationship by having personally examined the individual animal, herd, or a representative segment or a consignment lot thereof and determined that such controlled substance is therapeutically indicated following said examination.

VII.

By engaging in the planting, cultivating, harvesting and distributing marijuana as described in Paragraph I, the Respondent has violated Rules 5 and 33 of the Rules of Professional Conduct (Revised 8/86), as follows:

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.

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.

By engaging in the activity of delivering Scheduled Drugs and Controlled Substances to Sheila (Dunn) Burroughs and others as described in Paragraph II, not for use in animals, the Respondent has violated Rules 5 and 28 of the Rules of Professional Conduct (Revised 1/81 and 8/82),

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.

Rule 28

It is unprofessional conduct for a licensed veterinarian to prescribe or dispense, deliver or order delivered any controlled substance without first having established a

patient-veterinarian relationship by having personally examined the individual animal, herd or a representative segment or a consignment lot thereof and determined that such controlled substance is therapeutically indicated following said examination.

IX.

By engaging in the activity of delivering Scheduled Drugs to Sheila (Dunn) Burroughs and others as described in Paragraph II, not for use in animals, the Respondent has violated Rules 5, 27 and 33 of the Rules of Professional Conduct (**Revised 8/86**), as follows:

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.

Rule 27

It is unprofessional conduct for a licensed veterinarian to prescribe or dispense, deliver or order delivered any controlled substance without first having established a patient/veterinarian relationship by having personally examined the individual animal, herd, or a representative segment or a consignment lot thereof and determined that such controlled substance is therapeutically indicated following said examination.

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.

X.

By engaging in the activity of continuously administering Scheduled Drugs to his former wife, Sheila (Dunn) Burroughs, during the calendar year of 1987, and failing to maintain records relating to the administration of such Scheduled Drugs, as described in Paragraph III, the Respondent has violated Rules 5, 27, 30, 32 and 33 (**Revised 8/86**), as follows:

Rule 5 ADHERENCE TO THE LAW

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.

Rule 27 CONTROLLED SUBSTANCES: PRESCRIBING OR DISPENSING

It is unprofessional conduct for a licensed veterinarian to prescribe or dispense, deliver or order delivered any controlled substance without first having established a

patient/veterinarian relationship by having personally examined the individual animal, herd, or a representative segment or a consignment lot thereof and determined that such controlled substance is therapeutically indicated following said examination.

Rule 30 CONTROLLED SUBSTANCES RECORD KEEPING

Texas veterinarians shall maintain at their place of business records of all drugs listed in Schedule II of 21 Code of Federal Regulations, 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

Rule 32 PATIENT RECORD KEEPING

Individual records will include, but are not limited to, identification of patient, patient history, including immunization records, dates of visits, xrays, 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.

Rule 33 CONTROLLED SUBSTANCES

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 of the United States.

XI.

By engaging in the activity of continuously administering Scheduled Drugs to his employee Zelda Darlene Rogers, aka Darlene Couch during the calendar year of 1987, and failing to maintain records relating to the administration of such Scheduled Drugs as described in Paragraph IV, the Respondent has violated Rules 5, 27, 30, 32 and 33 (Revised 8/86), as follows:

Rule 5 ADHERENCE TO THE LAW

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.

Rule 27 CONTROLLED SUBSTANCES: PRESCRIBING OR DISPENSING

It is unprofessional conduct for a licensed veterinarian to prescribe or dispense, deliver or order delivered any controlled substance without first having established a patient/veterinarian relationship by having personally examined the individual animal, herd, or a representative segment or a consignment lot thereof and determined that such controlled substance is therapeutically indicated following said examination

Rule 30 CONTROLLED SUBSTANCES RECORD KEEPING

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- C. Date Administered, Dispensed, or Prescribed
- D. Quantity Administered, Dispensed, or Prescribed
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Rule 33 CONTROLLED SUBSTANCES

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 of the United States.

XII.

By engaging in the activity of ordering and receiving Controlled Substances as listed in Paragraph V, when not necessary or required for the care of animals; failing to establish a patient/veterinarian relationship prior to ordering the Controlled Substances listed in Paragraph V; failing to maintain patient records; and failing to maintain Controlled Substances records as described in Paragraph V, the Respondent has violated Rules 5, 27, 30, 32 and 33 (Revised 8/86), as follows:

Rule 5. ADHERENCE TO THE LAW

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.

Rule 27. CONTROLLED SUBSTANCES: PRESCRIBING OR DISPENSING

It is unprofessional conduct for a licensed veterinarian to prescribe or dispense, deliver or order delivered any controlled substance without first having established a patient/veterinarian relationship by having personally examined the individual animal, herd, or a representative segment or a consignment lot thereof and determined that such controlled substance is therapeutically indicated following said examination.

Rule 30 CONTROLLED SUBSTANCES RECORD KEEPING

Texas veterinarians shall maintain at their place of business records of all drugs listed in Schedule II of 21 Code of Federal Regulations, 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)
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XIII.

The Texas State Board of Veterinary Medical Examiners has authority to take disciplinary action against a veterinarian's license under the Texas Veterinary Licensing Act, (Revised 1/81 and 8/82), Article 7465a, V.A.C.S., Section 7(b) and Sections 14(c) and (e), which state, in part:

Sec. 7(b). 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.

Sec. 14. The Board may revoke or suspend any license, may refuse to examine an applicant, to issue a license or to issue a renewal of a license, after notice and hearing, as provided in Section 15 of this Act, or as provided by the rules of the Board, 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 law;

XIV.

The Texas State Board of Veterinary Medical Examiners has authority to take disciplinary action against a veterinarian's license under the Texas Veterinary Licensing Act (Revised 8/86), Article 7465a, V.A.C.S., Section 7(b) and Sections 14(c) and (e), which state, in part:

Sec. 7(b). 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.

Section 14. The Board may revoke or suspend a license, place a person whose license has been suspended on probation, reprimand a licensee, or may refuse to examine an applicant or to issue a license or a renewal of a license, after notice and hearing as provided in Section 15 of this Act, or as provided by the rules of the Board, 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 law.

XV.

The Texas State Board of Veterinary Medical Examiners has authority to take disciplinary action against DR. WARNER A. DUNN'S veterinary license under the Texas Veterinary Licensing Act, Article 8890, (formerly Article 7465a), V.A.C.S., Section 7(b) and Section 14(A) (3) and (5) which states in part:

Sec. 7(b). The Board shall require its licensees to maintain a record-keeping system for controlled substances as prescribed by the Texas Controlled Substances Act, (Article 4476-15, Vernon's Texas Civil Statutes). 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 8890, Section 14(a), Veterinary Licensing Act-
".....the Board may revoke or suspend a license, impose a civil penalty, place a person whose license has been suspended on probation or reprimand a licensee....if it finds that an applicant or licensee:

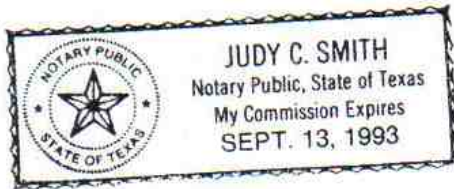
- (3) has engaged in dishonest or illegal practices in or connected with the practice of veterinary medicine;
- (5) has engaged in practices or conduct in connection with the practice of veterinary medicine which are violative of the standards of professional conduct as duly promulgated by the Board in accordance with the law;

The foregoing complaint is submitted to the Secretary of the Texas Board of Veterinary Medical Examiners on this the 4th day of April, 1990.

Further, Affiant sayeth not.

Joseph J. Rizzo
JOSEPH J. RIZZO, Affiant

SUBSCRIBED and SWORN TO before me by the said JOSEPH J. RIZZO, this the 4th day of April, 1990.



Judy C. Smith
JUDY C. SMITH
Notary Public in and for Texas

My Commission Expires: September 13, 1993

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. Warner A Dunn, D.V.M. under Docketed Number 1990-07, this the 4th day of April, 1990.

Mary E. Mainster, DVM
MARY E. MAINSTER, D.V.M., Secretary
Texas Board of Veterinary Medical Examiners