



5. As a result of an investigation conducted by the Board, Angels for Animals Rescue League was notified by a Notice of Opportunity for Hearing letter, dated January, 2013, that the Board intended to determine whether or not to reprimand, revoke or suspend her license to practice veterinary medicine in Ohio based upon the allegations that she had violated O.A.C 4741-2-01(D)(1), and 4741-1-05(B).

6. Based upon the foregoing, as a full and complete settlement of this matter and in the mutual best interests of the parties, Angels for Animals Rescue League and the Board hereby agree to the following settlement of Case No. 12-13-087:

- a. Angels for Animal Rescue League waives its right to an appeal and an opportunity to be heard pursuant to Chapter 119 of the Ohio Revised Code and specifically withdraws its request for a hearing in this matter.
- b. Angels for Animal Rescue League shall pay the costs of investigation of \$254.00 within thirty (30) days of the effective date of the Settlement Agreement by money order or certified check made payable to the Treasurer, State of Ohio.
- c. Angels for Animal Rescue League shall pay a fine of \$750.00 within thirty (30) days of the effective date of the Settlement Agreement by money order or certified check made payable to the Treasurer, State of Ohio.
- d. Angels for Animal Rescue League shall submit to the Board quarterly for one (1) year, from the effective date of the Settlement Agreement ten (10) medical records for animals treated at their facility, a total of 40 records. Use of the form attached and marked "Appendix – Physical Examination" shall deemed to constitute compliance with this agreement.

7. It is hereby understood that this agreement and the facts stipulated herein shall not be binding on any of the parties unless it has been signed and executed by the parties below. If the parties are unable to reach an agreement on the terms herein, this document shall become null and void and without any force or effect.

8. Angel for Animals Rescue League waives any and all claims or causes of actions it may have against the State of Ohio, the Ohio Veterinary Medical Licensing Board and its members, officers, employees and/or agents of either, arising out of the matters which are the subject of this settlement agreement.

9. If the Board determines that Angel for Animals Rescue League has violated any term(s) in Subsection 6 above, the Board by certified mail will give Angels for Animals Rescue League notice of the violation of this agreement. If, thirty days from receipt of the certified letter, Angels for Animal Rescue League does not comply with the term(s) violated, the Board may suspend or revoke Angels for Animal Rescue facility license for a period determined by the Board. Angels for Animals hereby knowingly and voluntarily waives its right to an appeal and an opportunity to be heard pursuant to Chapter 119 of the Ohio Revised Code as to any suspension or revocation invoked by the Board for a violation of the term(s) of which she was notified.

10. This document shall be considered a public record in accordance with Revised Code Section 149.43 and shall be released by the Board only if requested and only if required by law.

Sandra D. Leiny

Saeb  
10/9/2013

Angels for Animal Rescue League

Gurda Dass D.V.M.  
President  
Ohio Veterinary Medical Board

Date: 9-26-13

Date: 10/9/13