

Dear Judge Himes,

I am filing the attached **Amended Application for Review and Amended Motion for Stay**. This filing corrects procedural service issues and provides "non-conclusory" evidence of significant factual fabrications in the record.

Specifically, this filing demonstrates that the Regulatory Veterinarian:

1. **Fabricated Testimony:** Claimed to offer transportation that was never discussed.
2. **Requested Illegal Acts:** Suggested interstate transport that would violate **Federal Law (9 CFR § 71)**.
3. **Abandoned Duties:** Stayed 90 miles away, provided no referrals, and only discussed "medication at hand" during three emergency calls.

I respectfully request an immediate reinstatement of the Stay to prevent the irreparable destruction of my livelihood based on a falsified record.

Respectfully,

Zvi Kriple, Appellant

PART 2: THE CONSOLIDATED FILING (The PDF)

UNITED STATES OF AMERICA

BEFORE THE FEDERAL TRADE COMMISSION

ZVI KRIPLE, Appellant, v. HISA, Respondent.

CASE NO. 2025-21505

TABLE OF CONTENTS

1. Amended Application for Review	Page 1
• Error 1: Due Process & Preparation Time	
• Error 2: Fabrication of the "Transport Offer"	
• Error 3: Federal Law (Coggins) & Legal Impossibility	
• Error 4: Medical Abandonment & Bad Faith Referrals	
2. Amended Motion for Reinstated Stay	Page 3
3. Declaration of Zvi Kriple	Page 4
4. Certificate of Service	Page 5
5. Exhibits (1, 2, 2a, 3, 4, 5, A)	Attached

I. AMENDED APPLICATION FOR REVIEW

ERROR 1: Due Process Violation. The Authority denied Appellant's objection regarding the 10-day notice period. This prevented the securing of witnesses like Steve Sandy and a full review of the record.

ERROR 2: Fabrication of Testimony regarding "Transport." The Board relied on Dr. Renn's claim that he offered or suggested transportation. This is a fabrication. During three calls, Dr. Renn never discussed transport. He only discussed "medication at hand." A sanction based on a "refusal" of an offer that was never made is a reversible error.

ERROR 3: Legal Impossibility & Federal Law (9 CFR § 71). Even if transport had been suggested, it would have been a violation of federal law to move the horse across state lines without a current Health Certificate and Coggins test. Refusal to commit a federal offense is not "deprivation of care."

ERROR 4: Medical Abandonment. Dr. Renn was the most proximate regulatory official (Exhibit 5). He refused to attend, gave no names of available closer vets, and attempted a "psychic" diagnosis over a phone.

II. AMENDED MOTION FOR REINSTATED STAY

Appellant moves for a Stay because:

- 1. Likelihood of Success:** The record is based on a fabricated "transport offer" and a directive to break federal law.
- 2. Irreparable Harm:** Appellant's stable and career will be permanently lost without an immediate Stay.
- 3. Public Interest:** Protecting federal bio-security laws (9 CFR § 71) is in the highest interest of the racing industry.

III. DECLARATION OF ZVI KRIPLE

I, Zvi Krippe, declare under penalty of perjury:

1. I objected to the hearing date because I had no time to prepare.
2. I called Dr. Renn three times. He **never** suggested or offered transport.
3. Dr. Renn only discussed "medication at hand."
4. I knew the horse lacked the Health Certificate/Coggins required by **9 CFR § 71** for interstate travel.
5. Dr. Renn stayed at his practice in Lucasville (90 miles away) while claiming he could diagnose the horse.
6. HISA admitted that no rule requires a vet during morning training (**Exhibit 2a**).

Date: December 28, 2025

Signature: 

IV. CERTIFICATE OF SERVICE

I certify that on Dec 28, 2025, I served this filing via email to:

- FTC Secretary (electronicfilings@ftc.gov)
- ALJ Himes (oalj@ftc.gov)
- HISA/HIWU Legal (legal@hisaus.org; adjudications@hiwu.org)

Signature: Kelli M.

V. EXHIBIT LIST

- **Exhibit 1:** Hearing Notice (Short notice)
- **Exhibit 2/2a:** Rule Transparency/HISA Admission (No vet required)
- **Exhibit 3:** Steve Sandy's Eyewitness Texts (The truth of the scene)
- **Exhibit 4:** Belterra Stewards' Ruling (Proving the "psychic" vet was wrong)
- **Exhibit 5:** Map (Proving Dr. Renn was the closest vet but stayed home)
- **Exhibit A:** HISA Response to Appeal



Outlook



Fw: HISA v. Zvi Kriple, Case No. 2025-21507

From zvi kriple <zkriple@yahoo.com>

Date Thu 11/13/2025 12:01 PM

To ods06427cpc <ods06427cpc@officedepot.com>

EXTERNAL SENDER ALERT: This email originated from a sender **outside** of the company. Verify this email is legitimate before clicking on links or opening attachments.

Sent from Yahoo Mail for iPhone

Begin forwarded message:

On Thursday, September 25, 2025, 11:14 AM, zvi kriple <zkriple@yahoo.com> wrote:

Good morning!

I am in the process of collecting witness list as well as information from the Ohio commission.

That might take some time so please let's not commit to dates yet.

Regards

Zvi Kriple

Ps. I'm not sure how to provide copy to Mr Abbott

Sent from Yahoo Mail for iPhone

On Monday, September 22, 2025, 2:39 PM, Samuel Reinhardt <samuel.reinhardt@hisaus.org> wrote:

Good afternoon,

This email will memorialize the dates and deadlines agreed to by the parties and IAP Member Richard Abbott during the status conference today. If you have any corrections to the information provided below, please respond to this email by September 24, 2025.

1. The above matter is scheduled for a final hearing on Monday, **October 20, 2025**. The hearing will begin at 1:00 PM ET and will be conducted via



Outlook

EXHIBIT 2

Fw: HISA v. Zvi Kriple, Case No. 2025-21507

From zvi kriple <zkriple@yahoo.com>
Date Thu 11/13/2025 12:05 PM
To ods06427cpc <ods06427cpc@officedepot.com>

EXTERNAL SENDER ALERT: This email originated from a sender **outside** of the company. Verify this email is legitimate before clicking on links or opening attachments.

Sent from Yahoo Mail for iPhone

Begin forwarded message:

On Monday, September 29, 2025, 9:56 PM, zvi kriple <zkriple@yahoo.com> wrote:

Mr Reinhardt.

I am asking you for the third time to provide me with HISA regulations pertaining to Belterra racing and Casino to have a present of a Veterinary support during racing and traininig

At the facility in question.

Thanks

Sent from Yahoo Mail for iPhone

On Monday, September 29, 2025, 4:59 PM, Samuel Reinhardt <samuel.reinhardt@hisaus.org> wrote:

Mr. Abbott,

Pursuant to your Order at the September 22, 2025 Status Conference, attached please find the Witness and Exhibit List submitted on behalf of the Horseracing Integrity and Safety Authority, Inc. in connection with the above-referenced matter.

Thank you,

Sam Reinhardt
Assistant General Counsel
c: 859.230.8842

6:23

EXHIBIT 2(a)

5G

< 42



+1 (859) 514-0883 >

Text Message
Tuesday 3:32 PM

Hi Zvi, there is no rule in HISA that requires a Regulatory Vet at the racetrack during morning training. This is decided by the racetrack commission or the state. please call me if you have further questions or concerns.
Best, Tracy Gilman HISA Field Support.

Tuesday 4:57 PM

Google say something different

EXHIBIT 3

< 66

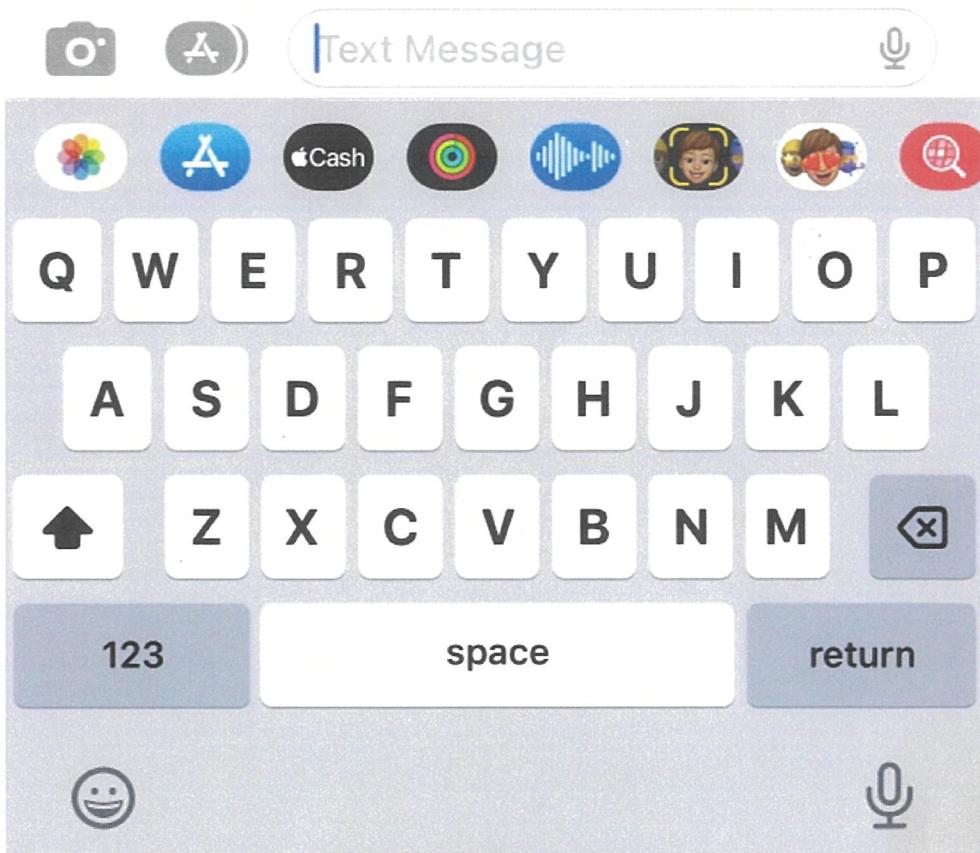


+1 (859) 519-5339 >

Text Message
Today 5:57 PM

This is Steve Sandy me n my help tried 2 call a number of vets 2 try n get someone 2 come treat this horse including the state vet. No one would come 2 the track that night!

Thanks a million





Ohio State Racing Commission

Licensee: KRIPPLE, ZVI
 License Type: 2025 1 Year OWNER
 Date of Birth: 10/22/1951
 License Number: 13936
 Ruling #: 2025-BP-45
 Track: Belterra Park
 Violation Type: License Denied, Rescinded, Revoked, Su

Action Type: Initial Ruling
 Action Date: 8/29/2025

Ruling:

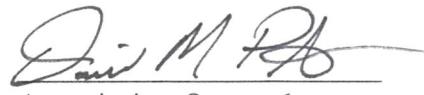
The Belterra Park Board of Stewards here-by rescind Owner/Trainer Zvi Kipple's 2025 OSRC license, with prejudice, and discontinuance of activity for which it was issued. Additionally, it is recommended by the Board of Stewards that the Ohio State Racing Commission put Mr. Kipple on a stop list, preventing him from any future license.

Rule References: 3769-2-05; 3769-2-26 (9 & 10)

All fines must be paid within 10 days.
You have the right to appeal this notice within 48 hours of receipt.
Unpaid fines will result in the suspension of all occupational license privileges.

BOARD OF STEWARDS

Vincent Clark
 State Steward


 Association Steward

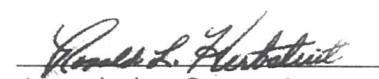
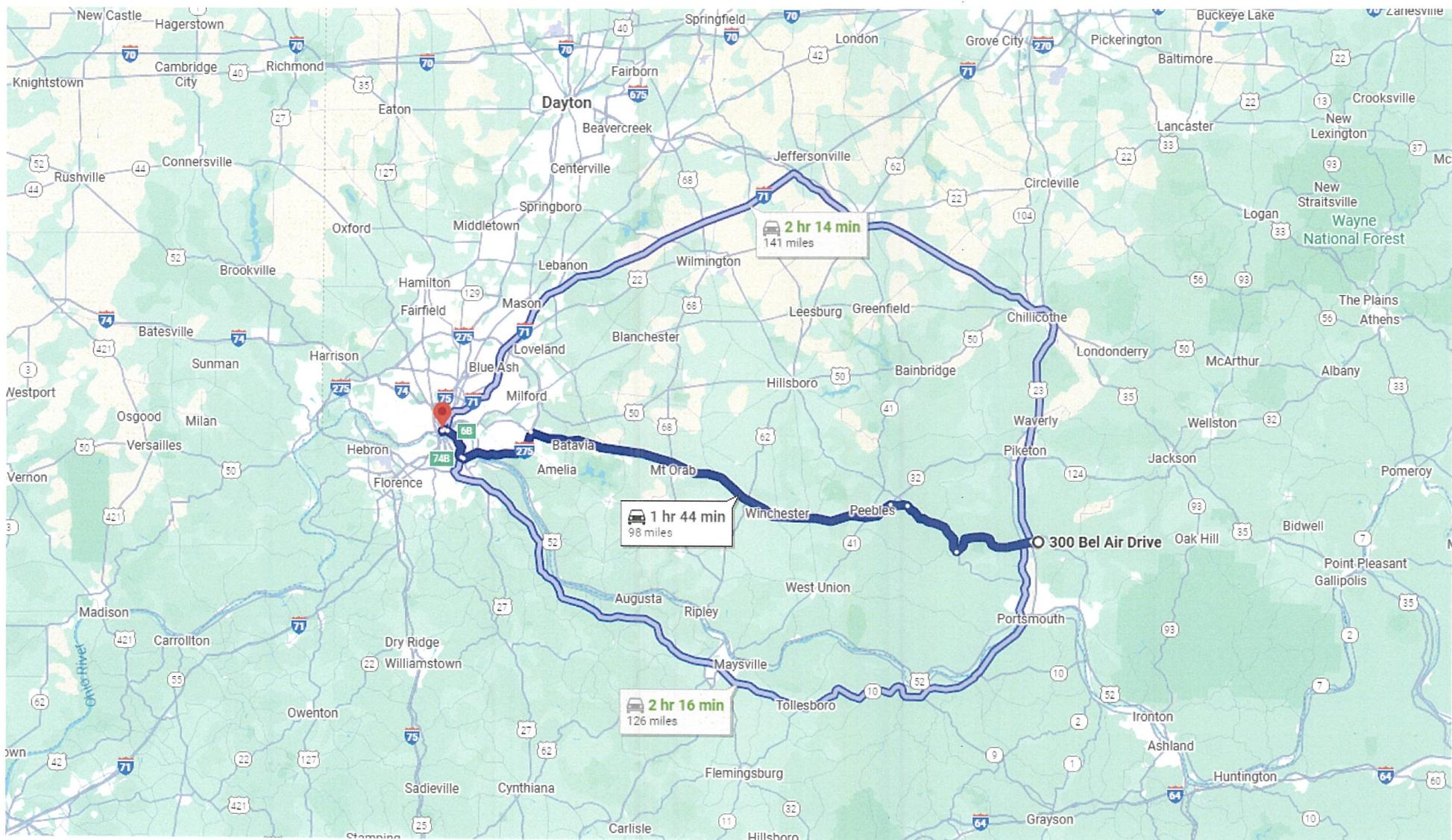

 Association Steward

EXHIBIT 5



A

BEFORE THE HORSERACING INTEGRITY AND SAFETY AUTHORITY

IN THE MATTER OF:)
ZVI KRIPLE) Action No. 2025-21507
)

RESPONSE TO APPEAL

* * * * *

On August 25, 2025, the Covered Horse ROYAL HONEY died in her stall at Belterra Park. ROYAL HONEY began displaying signs of colic on August 23, 2025.¹ ROYAL HONEY's condition worsened over the next day, and she ultimately died at 3:30 a.m. on August 25, 2025 from a colon volvulus – rupture of her digestive tract.² At no point from August 23 to August 25 did ROYAL HONEY receive any veterinary treatment for her condition.³ Mr. Kriple left ROYAL HONEY alone in her stall at 1:30 a.m. on August 25, and ROYAL HONEY died two hours later.⁴ Mr. Kriple, the Responsible Person for ROYAL HONEY, failed to provide ROYAL HONEY with proper veterinary care from August 23 to August 25, 2025.

Rule 2215(a)(4) provides:

No Covered Person acting alone or in concert with another person shall compromise the welfare of a Covered Horse for competitive or commercial reasons or subject or permit any Covered Horse under their control, custody, or supervision to be subjected to or incur the following:

...
(4) deprivation of necessary care, sustenance, shelter, or veterinary care.

¹ Amended IAP Decision at 2.

² *Id.*; HISA Hearing Exhibit 1 – Dr. Bart Sutherland's Welfare Assessment.

³ Amended IAP Decision at 2-3.

⁴ *Id.* at 2.

Mr. Kriple violated HISA Rule 2215(a)(4) with his failure to provide necessary veterinary care to ROYAL HONEY. The Internal Adjudication Panel (“IAP”) Decision (the “IAP Decision”) reaching this conclusion should be affirmed as it is not clearly erroneous and is supported by the evidence and applicable law.⁵

1. The IAP issued specific findings of fact and conclusions of law in the IAP Decision, which are supported by the evidence in the record.

The evidence in the record supports the IAP’s Decision that Mr. Kriple violated Rule 2215(a)(4). The IAP evaluated the evidence presented by both Mr. Kriple and HISA at the hearing. When considering the testimony Mr. Kriple provided, the IAP summarized Mr. Kriple’s testimony to be that “despite his best and repeated efforts over the periods of August 23 and 24, 2025, [Mr. Kriple] was unable to find any veterinarian that would either come to the racetrack to treat the horse or receive the horse at a clinic where it could be seen and treated.”⁶ Mr. Kriple testified at the hearing, but he presented no other witnesses or documentary evidence in support of his position. No other evidence in the record supports Mr. Kriple’s testimony.

HISA, conversely, presented three witnesses at the hearing. First, HISA presented Dr. Bart Sutherland, who testified regarding his professional veterinary opinion of ROYAL HONEY’s treatment and conducted a Welfare Assessment based on the Covered Horse’s conditions and events of August 23 to August 25, 2025.⁷ He

⁵ The IAP decision was subsequently amended to reflect that all relevant events in this matter took place from August 23 to August 25, 2025 rather than April 23 to April 25, 2025. Enforcement counsel’s Response to the Request for Stay in this matter referenced the April dates cited in the IAP decision, but enforcement counsel now adopts the correct dates of August 23 to August 25, 2025 in this filing.

⁶ *Id.* at 3.

⁷ HISA Hearing Exhibit 1 – Dr. Bart Sutherland’s Welfare Summary.

opined that large colon volvulus, ROYAL HONEY's condition, is one of the most severe and painful abdominal emergencies a horse could experience, typically requiring surgery, and if left untreated often results in death.⁸ Ultimately, Dr. Sutherland concluded in his report:

It is my opinion from the information provided that Mr. Zvi Kriple caused needless suffering by unnecessarily delaying or avoiding pursuing treatment for the uncontrollable pain of the horse "Royal Honey."⁹

Next, HISA presented Dr. Timothy Renn, ROYAL HONEY's attending veterinarian, for testimony. In addition to his testimony, Dr. Renn also provided a sworn statement regarding the Covered Horse's condition and events in question.¹⁰ Dr. Renn testified that Mr. Kriple contacted him on August 24, 2025, around 12:30 p.m. because ROYAL HONEY had colic. Informing Mr. Kriple that he was 100 miles away, Dr. Renn encouraged him to call Park Equine Hospital in Bourbon County, Kentucky or speak to other trainers to find a local veterinarian who could treat the horse.¹¹ Dr. Renn specifically told Mr. Kriple the horse needed treatment "or it was probably going to die."¹² Later that night, Mr. Kriple again called Dr. Renn and told him that the horse had yet to be seen by a veterinarian. Dr. Renn did not hear from Mr. Kriple again until after ROYAL HONEY's death.

Dr. Renn testified that ROYAL HONEY never received any veterinary care despite trainer Pearl Chain contacting veterinarian Dr. Tony Wolfe who agreed to

⁸ *Id.* at 2.

⁹ *Id.*

¹⁰ HISA Hearing Exhibit 3 – Dr. Timothy Renn's Veterinary Report.

¹¹ *Id.*

¹² *Id.*

treat ROYAL HONEY. According to Dr. Renn, trainers Pearl Chain, Steve Sandy, and Christy Estevanko, all stabled at Belterra Park, volunteered to transport the ROYAL HONEY to Dr. Wolfe's office for treatment free of charge, "yet Zvi declined to have the horse seen."¹³ Based on his professional experience, Dr. Renn opined that a ruptured volvulus required surgery for cure, or in the alternative, or euthanasia to prevent a "long drawn-out painful death of Royal Honey."¹⁴

HISA also presented Belterra Park steward David Pate for testimony. Mr. Pate testified regarding the stewards' actions regarding the events surrounding ROYAL HONEY's death. He testified that the Board of Stewards rescinded Mr. Kriple's Ohio racing license with prejudice and recommended he be placed on a "Stop List" to prevent him from future racing licensure in Ohio because he failed to provide ROYAL HONEY with medical care, even when it was offered to him free of charge.¹⁵ Mr. Pate continued:

It is my opinion, as a Steward and horseman in general, that Mr. Kriple should never be granted a racing license, of any kind, ever again. This is the second (2nd) time he has been found to have neglected animals in his care, and I would rather not find out if it will happen a third (3rd) time.¹⁶

Based on the review of the evidence in the record, the IAP determined that HISA had established the following facts by a "preponderance of evidence":¹⁷

Covered Person Zvi Kriple (P000-021-507) was the responsible person for the Covered Horse Royal Honey (H000-062-142) which was stabled at Belterra Park on August 23, 2025. On the afternoon of August 23,

¹³ *Id.*

¹⁴ *Id.*

¹⁵ HISA Hearing Exhibit 4 – David Pate Statement.

¹⁶ *Id.*

¹⁷ IAP Amended Decision at 1.

2025, which was a racing day at Belterra Park, the Covered Horse began to show symptoms of colic, a painful intestinal condition in horses. Without having sought veterinary aid on the 23rd, at 12:30PM on Sunday August 24, 2025 the Covered Person made contact with Dr. Timothy Renn to seek veterinary aid. Dr Renn informed the Covered Person that he was 100 miles away and was unable to return to the track to attend to the horse. He suggested several alternative veterinarians which might be able to attend to the horse in a timely manner. He further stressed the importance of having the horse seen to and that the condition, left untreated, could lead to a very painful death of the Covered Horse.

Dr. Renn further testified that his next contact with the Covered Person was at 8:30PM on the 24th when he was told by the Covered Person that the horse still had not been treated by a veterinarian. In his testimony, Dr. Renn quoted another trainer who was on the call as saying that several trainers had volunteered to ship the horse to a nearby vet clinic free of charge but that the Covered Person refused to take advantage of those offers. The Covered Person testified that he left the horse unattended at 1:30 AM on the 25th and that the Covered Horse fell out of its stall at 3:30AM and died what Dr. Renn described would have been a very painful death.

Autopsy results showed that the cause of death was a rupture of the Covered Horses' digestive tract.¹⁸

From this, the IAP reached the conclusion that:

Based on the applicable Racetrack Safety Rules ... and based upon the established evidence ... the Hearing Panel has determined that the Covered Person has violated the following Racetrack Safety Rule: 2215 (a)(4), which prohibits "the deprivation of necessary care, sustenance, shelter, or veterinary care" to a Covered Horse.¹⁹

The IAP's Decision, including the findings of fact and conclusion of law, are not clearly erroneous and are supported by the evidence in the record and applicable law.

¹⁸ *Id.* at 2.

¹⁹ *Id.* at 3.

2. It is the duty of Responsible Person to provide the minimum necessary care to Covered Horses.

In his appeal, Mr. Kriple asserts a “systemic failure, not personal negligence”²⁰ caused ROYAL HONEY’s death. This argument is nonsensical. Though Dr. Renn, ROYAL HONEY’s attending veterinarian, was unable to treat the Covered Horse from August 23 to August 25, 2025, he provided Mr. Kriple with the name of another equine hospital to call for treatment services.²¹ Additionally, another trainer at Belterra Park contacted Dr. Wolfe, who agreed to treat ROYAL HONEY, and multiple trainers offered to ship the Covered Horse to Dr. Wolfe’s office for treatment free of charge.²² Mr. Kriple refused each of these offers and suggestions. ROYAL HONEY did not receive veterinary care for her painful condition that ultimately led to her death because Mr. Kriple refused to provide her with the necessary, veterinary care she needed – even when offered to him.

Further, veterinarians are not required by HISA to be at the racetrack overnight. The Responsible Person has the duty to ensure that Covered Horses in his care receive treatments that are “the minimum necessary to address the diagnosed health concerns identified during the veterinary examination and diagnostic process.”²³ Dr. Renn told Mr. Kriple that the horse would “likely die” if she did not receive immediate treatment. Other trainers attempted to assist Mr. Kriple with the care of ROYAL HONEY. Yet, Mr. Kriple, the Responsible Person for ROYAL HONEY,

²⁰ Mr. Kriple Statement on Appeal at 2.

²¹ HISA Hearing Exhibit 4 – David Pate Statement.

²² *Id.*

²³ Rule 3040(b)(3)(iii).

did not provide her with the minimum level of necessary veterinary care. Mr. Kriple's deprivation of necessary, veterinary care resulted in ROYAL HONEY's death and his violation of Rule 2215(a)(4).

3. Mr. Kriple was not deprived of any due process during the adjudication.

Mr. Kriple received a fair hearing. Mr. Kriple was served with a Notice of Violation on September 10, 2025. Mr. Kriple did not respond to the Notice of Violation. On September 18, 2025, IAP member Abbott provided notice of his appointment to the parties. Mr. Abbott conducted a status conference with Mr. Kriple and counsel for HISA on September 22, 2025. At that conference, the parties agreed that the final hearing would occur on October 20, 2025 and witness and exhibit disclosures would be submitted by September 29, 2025 (HISA) and October 13, 2025 (Mr. Kriple). Mr. Kriple never objected to any part of the agreed upon timeline for adjudication. Mr. Kriple never expressed any concern or inability to prepare for the hearing prior to the hearing or during the hearing. Mr. Kriple did not present any witnesses, besides his own testimony, and he did not produce any documentary evidence at the hearing. Mr. Kriple was not deprived of any due process during the adjudication.

Mr. Kriple now makes broad, unfounded claims that witness intimidation occurred. He has provided no specificity in this allegation. HISA does not engage in witness intimidation.

4. The IAP Decision and attendant sanctions are not arbitrary or capricious.

The IAP Decision is neither arbitrary and capricious nor constitutes an abuse of discretion. The IAP's Decision is based on witness testimony, submitted statements, and other documentary evidence. All evidence HISA presented was substantiated by witness testimony. Conversely, Mr. Kriple did not provide any witnesses, besides himself, or any documentary evidence with which to substantiate his claims. The IAP assessed the presented evidence in the record, afforded it the appropriate weight, and reached the ultimate conclusion that Mr. Kriple violated HISA Rule 2215(a)(4).

Rule 8200 provides a range of sanctions the IAP could have administered in this case. Sanctions for a Rule 2215 violation could include a fine of up to \$50,000 and a lifetime ban from participation in Covered Horseracing activities. The two-year suspension the IAP Decision assessed is reasonable and within the permitted sanctions of Rule 8200. Further, the two-year suspension is appropriate given the extreme deprivation of necessary veterinary care Mr. Kriple inflicted on ROYAL HONEY.

CONCLUSION

Mr. Kriple violated Rule 2215(a)(4) by depriving ROYAL HONEY of necessary veterinary care from August 23 to August 25, 2025. As a result, ROYAL HONEY suffered for two days and died a painful death. Mr. Kriple demonstrated a clear disregard for the welfare of ROYAL HONEY. The evidence in the record supports the IAP Decision and attendant sanction. The Board should affirm the IAP Decision.