UNITED STATES OF AMERICA

BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Rebecca Kelly Slaughter, Acting Chair Woman
Noah Joshua Phillips
Rohit Copra Chopra
Christine S. Wilson

IN THE MATTER OF:

William E. March, Trainer
Sample #B200053581
Covered Horse: "PROTEST"
Tampa Bay Downs
Race #7: February 14, 2026

TO: THE UNITED STATES FEDERAL TRADE COMMISSION
OFFICE OF THE SECRETARY
CONSTITUTION CENTER
400 SEVENTH STREET, SUITE 5610
WASHINGTON, D.C. 20024
Mailed April 10, 2026
Emailed April 10, 2026 to ftc.gov/abo
Original Mailing: U.S. Mail 04/01/2026

Dear Commissioners,

This is my second mailing of the document titled REQUEST FOR DISMISSAL OF CHARGES concerning Case #B200053581.

As of the date of this correspondence I have not received a response from HISA, HIWU or The Federal Trade Commission. Please respond.

Sincerely,

William E. March

William E. March
Thoroughbred Horse Trainer
Florida License # 302380
2960 Sutherland Court 34684
(727) 365-5222

Attachments: **1.** Copy of Request for Dismissal of Charges of 04/01/2026 Letter to The United States of America Federal Trade Commission

2. Copy of prior Mailing Receipt from U.S. Postal Service dated 04/01/2026; Tracking Number 9505

5141 6294 6091 1538 19; Copy pf Postal Receipt Attached As A-1.

3. Copy of Request Dismissal of HIWU's Charges of February 13, 2026

Cc: Carla March

Office of the Secretary
Federal Trade Commission
Constitution Center
400 Seventh Street, Suite 5610
Washington, D.C. 20024
Mailed
(202) 326-2222

400 7th Street., SW
Washington, DC 20580
Emailed to: ftc.gov/abo

Geneva Gnam
Litigation Counsel
Fax: (816)285-1433
ggnam@hiwu.org

Monica Pilarski
HIWU Legal Assistant
mpilarski@hiwu.org

Office of Florida Governor
Ron DeSantis
gov@eg.myflorida.com

Office of Attorney General
State of Florida
The Capitol PL-01
Tallahassee, FL 32399-1050
Email: MyFloridaLegal.com

Florida Division of Pari-Mutuel Wagering
glenda ricks@flgaming.gov

Texas Thoroughbred Association
tracys@texasthoroughbred.com

Dave Baesler
Executive Director
Ohio HBPA
Fax: (614) 321-0786
Email: ohio-hbpa@rr0hio.com

A-1

UNITED STATES OF AMERICA

BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Rebecca Kelly Slaughter, Acting Chair Woman
Noah Joshua Phillips
Rohit Copra Chopra
Christine S. Wilson

IN THE MATTER OF:

William E. March, Trainer
Sample #B200053581
Covered Horse: "PROTEST"
Tampa Bay Downs
Race #7: February 14, 2026

REQUEST FOR DISMISSAL OF CHARGES

Subpart T-Procedures for Review of Final Civil Sanctions Imposed under the Horseracing and Safety Act.

Request to Dismiss Alleged Charges for Violation of the Safety Act §1.145

§Sec 1.145 Submission of Notice of civil sanctions.

(a) Requirements to file. If the Horseracing Integrity and Safety Authority (Authority) imposes a final civil sanction under 15 U.S.C. 3057(d) for a covered person's violation of a rule of the Authority, the Authority must submit notice of the sanction to the Federal Trade Commission (Commission) no later than <u>two days after the sanction has been issued "for the sanction to be enforceable."</u>

See page 5 number 4, "AMENDED NOTICE" OF FINAL SANCTIONS UNDER THE ADMC PROGRAM. Sent to The Federal Trade Commission in 4 to 5 days instead of the required 2 days. Any sanction by HISA or HIWU "is not enforceable."

Dates

1. February 4, 2026: ECM Notice of Alleged Controlled Medication Rule Violation. Results Management of this matter is the responsibility of HIWU.

2. February 7, 2026: Response to ECM Notice of Alleged Medication Rule Violation of issued February 4, 2026. Move for immediate stay.

3. February 11, 2026: Request for Production to laboratory chemist, Timothy R. Kruegar.

4. February 12, 2026: Received Gmail from Geneva Gnam,, Esquire, Litigation Counsel for HIWU. "Apart from the above, HIWU will not be providing any of the documentation requested as the requests are outside the scope of ADMC Program Rules. A Charge Letter will be issued tomorrow, which will detail your options moving forward."

5. February 17, 2026: Request Dismissal of HIWU's Charges of February 13, 2026. Gmail from Geneva Gnam to Monica Pilarski, legal assistant of HIWU and copied to Carla March The last two lines read : "Apart from the above, HIWU will not be providing any of the documentation requested as the requests are outside the scope of ADCM Program Rules. A charge letter will be issued tomorrow, which will detail your options moving forward."

6. February 17, 2026: Letter to Geneva N. Gnam : to HIWU Letter of February 13, 2026. Titled: REQUSET FOR DISMISSAL OF CHARGES.

7. February 19, 2026: GMAIL from Geneva Gnam to Carla March, Copied to Monica Pilarski. "As HIWU indicated in the attached email on February 12, 2026, Industrial Laboratories will not separately respond to your requests or your inquires. Any requests for documentation must go through HIWU."

8. March 4, 2026: RESPONSE TO FEBRUARY 13, 2026: ECM Charge of Controlled Medication Rule Violation, Covered Horse: Protest; Sample #B200053581 to Geneva N. Gnam, Esq. "The Florida Department of Pari-Mutuel Wagering is the Florida state organization that was recently bullied by misguided Federal Legislatures (legislators) out of their state responsibilities."

9. March 4, 2026: "HIWU's NOTICE" OF FINAL CIVIL SANCTIONS UNDER THE ADMC PROGRAM. **Pursuant to 15 U.S.C. 3058)b)(1), review of the decision must be requested within (30) days of HISA's notice to the FTC.**

10. March 9, 2026: HIWU's AMENDED NOTICE OF FINAL CIVIL. SANCTIONS UNDER THE ADMC PROGRAM. **Pursuant to 15 U.S.C. 3058(b)(1), review of the decision must be requested**

within (30) days of HISA's notice to the FTC. Copy of HISA, March 9, 2026: Civil Sanction Notice to the Federal Trade Commission from. John L. Forgy, Counsel to HISA.

11. March 25, 2026 titled, Request Dismissal of HIWU's Charges of February 13, 2026: (7 pages).

12. Also, attached is a copy of the letter dated March 9, 2026

BEFORE THE FEDERAL TRADE COMMISSION

February 4, 2026: Notice of Alleged Controlled Medication.

Federal Trade Commission

a. Notice Letter from John L. Forgy Lawyer, Counsel to HISA to Secretary of Federal Trade Commission
b. HISA is a private organization.

MARCH 4, 2026: RESPONSE TO: FEBRUARY 13, 2026; ECM Charge of Controlled Medication Rule Violation, Covered Horse: Protest; Sample #B200053581.

c. No Constitutional Rights given in writing or orally by a representative of HISA, HIWU or the Federal Trade Commission.

Review

Thoroughbred Race Horse named "Protest" won the seventh race at Tampa Bay Downs Race Course , "on January 14, 2026. "Protest"

was taken directly to the Test Barn by a Florida licensed groom signed in as Roberto Mader. The employees of the Florida Department of Business and Professional Regulations, at the test barn, reportedly took samples of urine and blood from "Protest" to ship for analysis. Some the Test Barn employees only initialed the Sample Collection Form, no readable signature. The Blood SAMPLE Identification Label was #B200053581. The owner of the horse "Protest", Carla March, wife, received the winning purse a few days later. The new Independent agency, HIWU, is attempting to have the Trainer, William E. March return the winnings for the alleged positive post race test finding for a legal substance Phenylbutazone. The use of Phenylbutazone has been proven safe and approved for use in Florida before January 2016. However, HIWU did not follow their own rules, they demanded the purse be returned before proving a violation had occurred.

Sincerely,

William E March

William E. March
Florida License # 302380
2960 Sutherland Court
Palm Harbor, FL 34684
(727) 365-5222

Cc: Carla March

Office of the Secretary
Federal Trade Commission
Constitution Center
400 Seventh Street, Suite 5610
Washington, D.C. 20024
Mailed
(202) 326-2222

400 7th Street., SW
Washington, DC 20580
Emailed to: ftc.gov/abo

Geneva Gnam
Litigation Counsel
Fax: (816)285-1433
ggnam@hiwu.org

Monica Pilarski
HIWU Legal Assistant
mpilarski@hiwu.org

Office of Florida Governor
Ron DeSantis
gov@eg.myflorida.com

Office of Attorney General
State of Florida
The Capitol PL-01
Tallahassee, FL 32399-1050
Email: MyFloridaLegal.com

Florida Division of Pari-Mutuel Wagering
glenda ricks@flgaming.gov

Texas Thoroughbred Association
tracys@texasthoroughbred.com

Dave Baesler
Executive Director
Ohio HBPA
Fax: (614) 321-0786
Email: ohio-hbpa@rr0hio.com

A-2

A-2

UNITED STATES POSTAL SERVICE.

PALM HARBOR
495 ALT 19
PALM HARBOR, FL 34683-9998
www.usps.com

04/01/2026 05:01 PM

TRACKING NUMBERS
9505 5141 6294 6091 1538 19

TRACK STATUS OF ITEMS WITH THIS CODE
(UP TO 25 ITEMS)

TRACK STATUS BY TEXT MESSAGE
Send tracking number to 28777 (2USPS)
Standard message and data rates may apply

TRACK STATUS ONLINE
Visit https://www.usps.com/tracking
Text and e-mail alerts available

PURCHASE DETAILS

Product	Qty	Unit Price	Price
Priority Mail® Flat Rate Env Washington, DC 20024 Flat Rate Expected Delivery Date Mon 04/06/2026 Tracking #: 9505 5141 6294 6091 1538 19	1		$11.95
Insurance Up to $100.00 included			$0.00
Total			$11.95
Grand Total:			$11.95
Cash			$15.00
Change			-$3.05

TO REPORT AN ISSUE
Visit https://emailus.usps.com

All hazardous labels/markings on leased boxes MUST be completely removed/obliterated if they no longer match the contents.

In a hurry? Self-service kiosks offer quick and easy check-out. Any Retail Associate can show you how.

TO FILE AN INSURANCE CLAIM
Visit https://www.usps.com/help/claims.htm

PREVIEW YOUR MAIL AND PACKAGES
Sign up for FREE at
https://informeddelivery.usps.com

Looking for a new opportunity? Join a team that delivers! The Postal Service is actively hiring for full and part-time positions. To learn more visit us at www.usps.com/careers

All sales final on stamps and postage.
Refunds for guaranteed services only.
Thank you for your business.

Customer Service
1-800-ASK-USPS
(1-800-275-8777)
Agents do not have any additional information other than what is provided on USPS.com.

Tell us about your experience.
Go to: https://postalexperience.com/Pos
or scan this code with your mobile device,

or call 1-500-410-7420.

JFN: 117230-0265
Receipt #: 840-53350189-4-5927711-1
Clerk: 35

A-3

Thursday, March 19, 2026. Thru Wednesday, March 25, 2026

To: John L. Forgy, Esq.
HISA Attorney
830 Vermillion Peak Pass
Lexington, Kentucky
(859)940-1215
Email:

Michelle Pujals
HIWU General Council
Horseracing Integrity & Welfare Unit
4801 Main Street,
Suite 350
Kansas City, Missouri 64112-2745
(816) 285-1425
EMAIL Not Known

Request Dismissal of HIWU's Charges of February, 13, 2026

On the following four dates I received the documents listed below (1-4) from HIWU with attachments from HISA (some correspondence has headings from both).

1. February. 4, 2026: Re: ECM Notice of Alleged Controlled Medication Violation, Covered Horse: Protest, Sample #B20005381. From: Geneva N. Knam, Esq. of HIWU
   a. Included: Sample Collection Form dated 01/14/2026.
   b. Included: Certificate of Analysis Form dated 1/29/2026
   c. Included: HISA-Covered Person Pro Bono Form

d. Received Gmail on **February 12, 2026** at 6:10 PM from Monica Pilarski , HIWU to Carla March. The last two lines read, "Apart from the above, HIWU will not be providing any of the documentation requested as the requests are outside the scope of ADMC Program Rules. A charge letter will be issued tomorrow, which will detail your options moving forward."

The request would NOT be outside the scope of a Local, State or Federal agency. A simple Public Records Request would supply most records. There are exceptions like medical records and sexual assault records and some others.

2. **February 13, 2026: ECM "Charge" of Controlled Medication Rule Violation, Covered Horse: Protest, Sample #B200053581. From: Geneva N. Gnam, Esq. of HIWU**
   a. Included: HISA-Covered Person Pro Bono Program Form.

3. **March 4, 2026: "NOTICE" OF FINAL CIVIL SANCTIONS" UNDER THE ADMC PROGRAM. RE: ECM2026-41/ECM Charge of Controlled Medication Rule Violation-Rule 3312 Covered Horse: Protest. From: HIWU: Michelle Pujals, General Council**

   a. Included: HISA-Fine Payment Instructions
   b. March 6, 2026 at 8:11 AM Gmail received Geneva N. Gnam, esq. ..."**the appeal procedures**...16 Code of Federal Regulations Part I, Subpart T...

No Lawful Notice to the Federal Trade Commission as directed by Rule 16 CFR PART 1

FEDERAL TRADE COMMISSION
16 CFR PART 1

Procedures for Review of Final Civil Sanctions imposed Under the Horseracing Integrity and Safety Act
Procedures for Review of Final Civil Sanctions Under the Horseracing integrity and Safety Act
AGENCY: Federal Trade Commission.
ACTION: FINAL rule.
SUMMARY: To implement the Horseracing Integrity and Safety Act of 2020, The Federal Trade Commission issues a final rule to establish procedures for the review b y an Administrative Law Judge of final civil sanctions imposed by the Horseracing Integrity and Safety Authority and the review by the Commission of the decision of the Administrative Law Judge.

I. Background on Horseracing Integrity and Safety Act

The Horseracing Integrity and Safety Act of 2020 ("Act"),[1] enacted on December 27, 2020, directs the Federal Trade Commission ("Commission") to oversee the activities of a private, self-regulatory organization called the Horseracing Integrity and Safety Authority ("Authority").....The violations are determined through a

disciplinary process governed by 15 U.S.C. 3057(c).....

---

[1] 15 U.S.C. 3051 through 3060

II. Contents of the Final Rule

A. Section 1.145-Submission of Notice of Civil Sanction

The Act, in 15 U.S.C. 3058(a), requires the Authority to "promptly to the Commission notice" of a final civil sanction" the Authority has imposed against a "covered person"[2] for a violation of the rules or standards of the Authority.[3] The notice is to be provided in a format specified by the Commission. The final rule describes the contents of the notice, defines "promptly" as within two days, and specifies the manner of submission.

Subpart T-Procedures for Review of Final Civil Sanctions Imposed under the Horseracing Integrity and Safety Act.

§Sec 1.145 Submission of Notice of civil sanctions.

(a) Requirements to file. If the Horseracing Integrity and Safety Authority (Authority) imposes a final civil sanction under 15 U.S.C. 3057(d) for a covered person's violation of a rule of the Authority, the Authority must submit notice of the sanction to the Federal Trade Commission

(Commission) no later than two days after the sanction has been issued for the sanction to be enforceable.

Not included in the package of March 4, 2026 was a copy of Email Notice sent to the Federal Trade Commission regarding a positive finding of Sample #B20053581 by HISA, HIWU, Industrial Laboratories of Kansas City, MO or any private industry or person as required by 15 U.S.C. 3057(d) and §1.45

4. March 9, 2026: "AMENDED NOTICE" OF FINAL CIVIL SANCTIONS UNDER THE ADMC PROGRAM. RE: ECM2026-41/ECM Charge of Controlled Medication Rule Violation-Rule 3312 Covered Horse: Protest.

a. Included HISA-Fine Payment Instructions

b. **AMENDED NOTICE OF FINAL CIVIL SANCTIONS UNDER THE ADMC PROGRAM** dated March 9, 2026 was Emailed to William E. March via his wife, arriving at 8:45P.M., **3/10/2026**

March 9, 2026 (Emailed March 10, 2026) page 4 of "AMENDED NOTICE"

III. Imposition of Consequences. FINE PAYMENT INSTRUCTIONS FROM HISA WAS ON THE 6TH Page (unmarked back of page 5) of the DOCUMENT. Date Emailed from HIWU was "**March 10, 2026**".

Also Emailed on **March 10, 2026** ,dated **March. 9, 2026,** was a letter titled "**Secretary of the Federal Trade Commission**" signed by John Forgy Counsel to HISA not HIWU. This date was **Four (4) days after** the ***due*** **date** of

"**March 6, 2026**".(See John L. Forgy's Proof of Service letter to . Dated March 9, 2026

Again ,this **Notice** was titled **Amended Notice of Final Sanctions** document dated **"March 9, 2026"**, again **five days after** the **due date**, "**Notice of Final Sanctions**"; dated **"March 4, 2026". ***See 3 #above.*****

CLOSING

MOVE FOR DISMISSAL Of CHARGES FOR HISA'S AND OR HIWU"S FAILURE TO NOTICE THE FEDERAL TRADE COMMISSION TIMELY BY MARCH 6, 2026 OF THEIR FINAL ACTIONS IN THIS MATTER (THEIR NOTICE). THERE IS NO PROOF OF MAiLING THE NOTICE OF FINAL SANCTIONS IN THE RECORD.

THERE IS A DOCUMENT allegedly MAILED ON MARCH 9, 2026 TITLED: "AMENDED" NOTICE OF FINAL CIVIL SANCTIONS UNDER THE ADMC PROGRAM (See numbers 3 & 4 above).

THE HISA AMENDED NOTICE IN NUMBER 4 ABOVE WAS LATE. See 15 U.S.C. 3057(d).

CIVIL SANCTION NOTICE

Safety Act§ 1.145: Submission of Notice of civil sanctions
Authority : 15 U.S.C. 3058

(a) Requirement to file. If the Horseracing Integrity and Safety Aurhority (Authority) imposes a final civil action under 15 U.S.C. 3057(d) for a covered person's violation of a rule of the Authority, the Authority must submit notice of the sanction to the Federal Trade Commission

(Commission) **no later than two days after the sanction has been issued for the sanction to be enforceable.**

HIWU's NOTICE TO THE FEDERAL TRADE COMMISSION WAS THREE DAYS LATE THEREFOR **AUTOMATICALLY UNENFORCEABLE.**

If HIWU"S and HISA's employees refuse to recognize the illegal action that was taken, **I request a hearing before the Commission or Hearing Officer, whichever is the next legal appellate step if this charge is not dropped. I reserve the right take another legal avenue according to HIWU and HISA's response.**

However, again, this. Case should be legally dropped. It is ripe for dismissal.

Sincerely,

William E. March

William E. March
Licensed Thoroughbred Horse Trainer
Florida License #302380
2960 Sutherland Court
Palm Harbor, Florida 34684
(727) 365-5222
om
cjmarch1316@gmail.com

Cc: Carla March, at home address

SEE page 4,5,6 for Cc's

Monica Pilarski
HIWU Legal Assistant

Geneva Gnam
Litigation Counsel
Horseracing Integrity & Welfare Unit

Timothy Kruegar
Industrial Laboratories
tkruegar@industriallab oratories.net

Office of Florida Govenor
Ron Desantis
Desantis.open
The Capitol
400 S. Monroe Street
Tallahassee, Florida 32399

Michelle Pujals
HIWU General Counsel
c/o Geneva Gnam

Office of Attorney General
State of Florida
The Capital PL-01
Tallahassee, FL 32399-1050
Email: MyFloridaLegal.com

State of Florida

Dept. of Legal Affairs
Attn: ADA
Complaint Coordination
Capital PL-01
Tallahassee, FL. 32399-1056

Florida Division of Pari-Mutuel Wagering
Florida Gaming Control Commission
Executive Branch
Director Joe Dillmore
ATTN: Glenda Ricks
Chief Operating Officer
4070 Esplanade Way
Suite 250
TallaHASSEE, FL 32399
Email: joe.dillmore@flgaming.gov
Email: glenda. ricks@flgaming.gov
Email: Bradford.Jones@flgaming.gov
Chief Investigator
1400 West Commercial Blv d.
Suite 1656
Ft. Lauderdale, FL 33309-3787
(754) 288-1055

The Texas Thoroughbred Association
192 Cimarron Park Loop, Suite A
Buda, Texas 78610
(512). 458-6133
Fax (512) 453-5919
Email Executive Director: tracys@texasthorougbred.com
Horsemen's Benevolent & Protective Association
Dave Basler, Executive Director
Ohio Division

3860 Broadway
Grove City, Ohio 43123
(800)321-8367
Fax: (614) 875-0786
Email: ohio-hbpa@rrohio.com