UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES
FTC DOCKET NO. D-9447

ADMINISTRATIVE LAW JUDGE: **HON. JAY L. HIMES**

IN THE MATTER OF:

CRAIG A. LEWIS **APPELLANT**

THE AUTHORITY'S REPLY TO APPELLANT'S PROPOSED FINDINGS OF FACT, CONCLUSIONS OF LAW & LEGAL BRIEF

Comes now the Horseracing Integrity and Safety Authority, Inc. ("**HISA**" or the "**Authority**") pursuant to the Administrative Law Judge's Order, dated April 8, 2026, and submits the following Reply to Appellant's Proposed Findings of Fact, Conclusions of Law, and Legal Brief.

PUBLIC

CERTIFICATE OF SERVICE

Pursuant to Federal Trade Commission Rules of Practice 4.2(c) and 4.4(b), a copy of the Authority's Reply to Appellant's Proposed Findings of Fact, Conclusions of Law, Order and Supporting Legal Brief is being served on May 14, 2026, via Administrative E-File System and by emailing a copy to the below listed. I further certify that no portion of the filing was drafted by generative artificial intelligence ("AI") and any language in the filing that was drafted by generative AI was checked for accuracy by human attorneys or paralegals using printed legal reporters or online legal databases.

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PUBLIC

REPLY TO APPELLANT'S PROPOSED FINDINGS OF FACT

1. Appellant became a licensed horse trainer in 1981 under California law, with license number 052095 and has been licensed in multiple states including Kentucky, New Jersey, Illinois, Louisiana, Texas, Oklahoma, Arizona, New Mexico and West Virginia, which have no reciprocity with California. [Appeal Book ("AB"), 040] He currently trains horses that race at Santa Anita Park, Del Mar Racetrack and at times, Los Alamitos Race Course [AB 090-094, at 091].

- This is Appellant's claim.

2. In forty-five (45) years of training, Appellant never had any purse taken away (with the very rare exception of interference by a horse in a race) nor has he ever been suspended for any violation by any track or agency. [Appeal Book Supplement ("ABS"), 277 (Lewis)] Appellant has an exemplary record. [ABS 273-279, 282-284 (Lewis)]

- This is Appellant's claim.

3. John P. Araujo, DVM, became a licensed veterinarian in 1977, under California law, with license number 6361. [AB, 018-019]

- This is Appellant's claim.

4. Dr. Araujo has been the primary veterinarian of Appellant for some forty (40) years, having treated some six thousand (6,000) thoroughbred racehorses trained by Appellant. [AB, 018-038, at 019; ABS, 281-282 (Lewis)]

- This is Appellant's claim.

5. Dr. Araujo has treated more than one thousand (1,000) thoroughbred racehorses trained by Appellant with methocarbamol, in the exact same manner by injecting them intravenously with at least forty-eight (48) hours in advance of a scheduled race, with no post-race violations. [AB, 018-021, at 019]

- This is Appellant's claim.

6. Dr. Araujo also treated the Covered Horse in all five (5) of her career races, which occurred on (i) April 5, 2025, (ii) April 25, 2025, (iii) May 18, 2025, (iv) July 31, 2025, and (v) August 31, 2025, with an intravenous injection of the exact same milligrams at least forty-eight (48) hours in advance of the Covered Horse's next scheduled race. [AB, 019-020]

- Agreed.

7. In the four career races of the Covered Horse, one of which she won, before her race on August 31, 2025, there were no post-race medicine violations. [AB, 018-038, at 020-021; ABS, 287-288]

- Agreed; however, per Kikuride's Sample collection history, she was only subject to Post-Race Testing after one of those previous four Races. AB, p. 228.

8. After Dr. Araujo injected methocarbamol into the Covered Horse on August 29, 2025, he reported in writing, as required, the timing and exact amount of milligrams, with proper limits, that he injected her with, to the California Horse Racing Board. [AB 018-030, at 025-038; ABS, 288-291]

- This is Appellant's claim.

9. Dr. Araujo had absolute total control over the intravenous injection that he administered on August 29, 2025, to the Covered Horse. Appellant had no such control. [AB, 018-038, at 020, 090-094 at 092] Indeed, Appellant is absolutely precluded from possessing or using a syringe, needle or similar instrument. [AB 090-094, at 091]

- HISA does not agree. Appellant stated he "instructed" Dr. Araju to administer Methocarbamol to Kikuride. Pursuant to Rules 3040(b)(3)(v) and 3040(b)(6), as the Responsible Person, Appellant is personally responsible for ensuring treatments and medications administered to his Covered Horse do not violate the ADMC Program.

10. On August 31, 2025, Appellant was the trainer of the racehorse, the Covered Horse. [AB, 041, 121-122]

- Agreed.

11. On August 31, 2025, the Covered Horse finished first in Race 11 at Del Mar Racetrack in California. [AB, 122]

- Agreed.

12. Following the race of the Covered Horse on August 31, 2025, HIWU Sample Collection Personnel collected a blood sample and urine sample from the Covered Horse, not a hair sample. [AB, 149, 150]

- Agreed.

13. Although the blood sample was drawn from the Covered Horse on August 31, 2025, it was not sent to the Kenneth L. Maddy Equine Analytical Chemistry Laboratory at the University of

California, Davis ("UCD"), until September 2, 2025, receipt of which was acknowledged on September 3, 2026. [AB, 122, 142, 179-180]

- Agreed.

14. HIWU did not call any witnesses nor provide any declarations at the IAP proceeding on February 17, 2026, about the chain of custody of the blood sample taken from the Covered Horse on August 31, 2025, before arriving at UCD on September 3, 2025. [ABS, 306-344 (Heath)]

- Agreed.

15. UCD's laboratory documentation package, if any, fails because no evidence was offered as to how the Covered Horse's blood sample held or stored in custody after the blood sample was taken on August 31, 2025, before arriving at the laboratory on September 3, 2025. [ABS, 306-344 (Heath)]

- HISA does not agree. Such information is not required to be disclosed under the ADMC Program Rules, and Appellant never requested this information.

16. Although the HIWU Sample Collection Form indicates that the blood was sealed, HIWU did not call any witnesses nor provide any declarations at the IAP proceeding on February 17, 2026, about the laboratory documentation package from UCD indicating "if the storage of the Covered Horse's blood sample was secure." [AB, 149; ABS, 306-344 (Heath)]

- Agreed. Such information is presumed to have been conducted custodial procedures in accordance with Laboratory Standards in accordance with Rule 3122(c).

17. On September 19, 2025, UCD issued a Certificate of Analysis, reporting an Adverse Analytical Finding ("AAF") for the Covered Horse, was based on a "hair sample" finding of methocarbamol. [AB, 142]

- Agreed. On October 2, 2025, the Certificate of Analysis was amended to correct a clerical error which stated, "Hair sample number B200035796 was found to contain Methocarbamol" to accurately state, "Blood sample number B200035796 was found to contain Methocarbamol." AB, p. 221. No other information was amended. Notably, no hair Sample has ever been collected from Kikuride (AB, p. 150); the Sample number in the September 19, 2025 Certificate of Analysis reflected a blood Sample was analyzed via the letter "B" preceding the Sample number, and not a hair Sample, which would have been

indicated via the letter "H" before the Sample number (AB, p. 149); and the A Sample Laboratory Documentation Package reflected a blood Sample was analyzed (AB, p. 171). This matter was addressed in HIWU's Written Submission, dated January 16, 2026 (AB, p. 122), and Appellant did not raise the issue, or otherwise object before or during the merits hearing.

18. UCD's laboratory documentation package, if any, fails because it does not identify two Certifying Scientists' signatures, rather than two "analysts" signatures, on the laboratory documentation package or on the Certificate of Analysis, and recorded, which constitutes a departure from the Laboratory Standards. [ABS, 306-344 (Heath)]

- HISA does not agree. Laboratories are presumed to have conducted Sample analysis in compliance with Laboratory Standards in accordance with Rule 3122. Though a Covered Person may rebut this presumption by establishing a departure from Laboratory Standards occurred which could reasonably have caused the Adverse Analytical Finding, no such effort was made by Appellant to do so before or during the merits hearing.

19. Methocarbamol is characterized as a Category C, Controlled Medication on the Prohibited List. [AB, 121]

- Agreed.

20. Methocarbamol is not designed to enhance performance but rather is prescribed as a muscle relaxant to treat muscle spasm. [AB, 013]

- HISA does not agree. Additionally, pursuant to Rule 3113, the inclusion of Methocarbamol on the Technical Document—Prohibited Substances is not subject to any challenge by any Covered Person or other Person on the basis that the substance does not have the potential to enhance the performance of a Covered Horse.

21. On September 24, 2025, HIWU sent a letter, together with a copy of the A Sample Certificate of Analysis from UCD, to Appellant which constituted an Equine Controlled Medication ("ECM") Notice, pursuant to the Anti-Doping Medication Control ("ADMC") Program Rule 3345 of the Protocol, Program Rule 3312, referring to methocarbamol as a Category C of the Controlled Medication Rule Violation, which could lead to, among other things,

the automatic disqualification of the purse in accordance with ADMC Program Rule 3321(a) of the Protocol. [AB, 144-148]

- Agreed, except HIWU's ECM Notice stated Methocarbamol was a category S7, Class C Controlled Medication Substance. AB, p. 146.

22. On September 24, 2025, HIWU sent a letter to Appellant inquiring whether Appellant desires to have the B Sample analyzed, with a deadline of September 29, 2025. [AB, 144-148, at 146]

- Agreed.

23. On September 25, 2025, Appellant requested analysis of the B Sample. [AB, 121, 160-165, at 160]

- Agreed.

24. On October 2, 2025, UCD issued another Certificate of Analysis, reporting an AAF for the Covered Horse, based on a "blood sample" finding of methocarbamol. [AB 221]

- Agreed.

25. Peculiarly, UCD's Certificate of Analysis, dated September 19, 2025, alleges that it tested a hair sample, whereas another UCD Certificate of Analysis, dated October 2, 2025, issued more than a month after the Covered Horse raced, claims that the blood sample was tested. [AB, 142, 221]

- HISA does not agree. On October 2, 2025, the Certificate of Analysis was amended to correct a clerical error which stated, "Hair sample number B200035796 was found to contain Methocarbamol" to accurately state, "Blood sample number B200035796 was found to contain Methocarbamol." AB, p. 221. No other information was amended. Notably, no hair Sample has ever been collected from Kikuride, the Sample number in the September 19, 2025 Certificate of Analysis reflected a blood Sample was analyzed via the letter "B" preceding the Sample number, and not a hair Sample, which would have been indicated via the letter "H" before the Sample number (AB, p. 149), and the A Sample Laboratory Documentation Package reflected a blood Sample was analyzed (AB, p. 171).

This matter was addressed in HIWU's Written Submission on January 16, 2026 (AB, p. 122), and Appellant did not raise the issue, or otherwise object before or during the merits hearing.

26. UCD's laboratory documentation package, if any, fails because no evidence was offered as to how the Covered Horse's blood sample held or stored in custody after the hair sample taken on September 19, 2025, until the blood sample was taken on October 2, 2025. [AB 142, 221; ABS, 306-344 (Heath)]

- HISA does not agree. No hair Sample was collected from Kikuride by HIWU on September 19, 2025.

27. On October 10, 2025, Equine Integrity & Anti-Doping Sciences ("EQIAS") Laboratory in Lexington, Kentucky acknowledged receipt of the blood sample of the Covered Horse from UCD. [AB, 166]

- Agreed.

28. The Covered Horse's B Sample was analyzed by EQIAS, which issued a Certificate of Analysis, on October 28, 2025, allegedly confirming the findings of UCD in A Sample, even though it allegedly tested for Lasix rather than methocarbamol. [AB, 166]

- HISA does not agree. The B Sample Certificate of Analysis confirmed the B Sample was analyzed and the presence of Methocarbamol was detected. AB, p. 166.

29. On November 3, 2025, based on detection of methocarbamol above the Screening Limit in the Covered Horse, HIWU provided to Appellant an A Sample laboratory documentation package of its analysis from UCD and the B Sample Certificate of Analysis from EQIAS. [AB 160-165]

- Agreed. These documents were provided as attachments to the ECM Charge letter issued to Appellant on November 3, 2025. AB, p. 165.

30. On November 3, 2025, HIWU served Appellant with an ECM charge of Controlled Medication Rule Violation pursuant to ADMC Program Rule 3312. [AB, 123]

- Agreed.

31. On November 3, 2025, Dr. Araujo signed a declaration under oath that was submitted as evidence to the Internal Adjudication Panel ("IAP") in support of Appellant. [AB, 3, 022- 038]

- Agreed.

32. On November 6, 2025, Appellant requested a hearing before the IAP pursuant to Rule 3361 and such proceedings were initiated pursuant to HISA Rule 7020(b). [AB, 124]

- Agreed.

33. On November 24, 2025, Appellant filed a Motion of Appellant to Obtain a DNA Sample from Certain Horse, Kikuride. [AB, 010-043, 124]

- Agreed.

34. On December 3, 2025, HIWU filed HIWU's Response to Appellant's Motion to Obtain DNA Sample. [AB, 044-053]

- Agreed. Additionally, after receiving HIWU's Response, on December 3, 2025, Appellant requested via email that the IAP afford him an opportunity to submit a reply. SAB2, p. 387. The same day and via email, HIWU objected to Appellant's request. SAB2, pp. 386-387.

35. On December 5, 2025, the IAP erroneously denied Appellant's Motion to Obtain DNA Sample. [AB, 054-055, 124, 245-251]

- This is a legal conclusion. On December 5, 2025, IAP Member Kagno denied Appellant's request to reply and further denied his Motion to Obtain DNA Analysis. SAB2, p. 386.

36. On February 3, 2026, Appellant filed a Motion of Appellant for Reconsideration of the Denial of Appellant's Previous Motion to Obtain DNA Sample. [AB, 229-240]

- Agreed. Additionally, Appellant submitted a Motion for Reconsideration on December 5, 2025, which was dated December 9, 2025. SAB2, p. 389. On December 7, 2025, Appellant supplemented his Motion for Reconsideration with additional email argument. SAB2, pp. 391-392.

37. On February 4, 2026, HIWU filed HIWU's Motion to Strike Appellant's Motion for Reconsideration. [AB, 241-242]

- Agreed.

38. On February 4, 2026, the IAP erroneously denied Appellant's Motion for Reconsideration. [AB 242, 245-251]

- This is a legal conclusion. On February 12, 2026, IAP Member Kagno denied Appellant's Renewed Motion for Reconsideration and further denied his Request for Stay, as was within her authority to do pursuant to Rule 7280. SAB2, p. 382.

39. On February 17, 2026, the IAP hearing took place. [AB, 243-244, 245-251, 252-253]

- Agreed.

40. At the hearing on February 17, 2026, Appellant again requested the IAP to allow DNA testing, expressing Appellant's willingness to pay all expenses. [ABS, 260:12-262:6; 298:3-299:14; 329:14-330:1; 345:6-21; 345:17-21]

- Agreed.

41. On March 1, 2026, the Final Ruling of the IAP was issued against Appellant by IAP Member Julie Kagno and did not address Appellant's renew request for DNA testing. [AB, 245-251]

- Agreed.

42. The IAP erroneously denied Appellant's contention that he established "No Fault or Negligence" in accordance with Rule 3324(a), notwithstanding that Appellant testified under oath that he did not know or suspect, and could not have reasonably known or suspected, even with the exercise of the utmost caution, that the Covered Horse was over the limit for methocarbamol when she raced on August 31, 2025. [AB, 091-093, 245-251]

- This is a legal conclusion. The IAP found Appellant had not established he was entitled to a finding of "No Fault or Negligence" in accordance with Rule 3324 and pursuant to the ADMC Program. AB, p. 248.

REPLY TO APPELLANT'S PROPOSED CONCLUSIONS OF LAW

1. The ALJ's determination pursuant to 15 U.S.C. §3058(b)(2)(A), as implemented in 16 C.F.R. 1.146, must be made *de novo*.

- Agreed.

2. HIWU has not proven by admissible evidence that Appellant's "acts, practices or omissions" are in violation of HISA Rule 3312(b).

- HISA does not agree. HIWU presented "sufficient proof of a Rule 3312 Controlled Medication Violation" when it established Kikuride's B Sample was analyzed and the analysis of the B Sample confirmed the presence of Methocarbamol found in the A Sample, in accordance with Rule 3312(b)(2). AB, p. 248.

3. The IAP failed to determine under Rule 7260(d), the "admissibility, relevance, and materiality" of UCD's laboratory documentation package.

- HISA does not agree. IAP Member Kagno determined UC Davis' Certificate of Analysis was established to the comfortable satisfaction of the panel. AB, p. 247.

4. UCD's laboratory documentation package, if any, fails because no evidence was offered about the chain of custody as to how the Covered Horse's blood sample was taken on August 31, 2025, before arriving at the laboratory on September 3, 2025, and further between September 19, 2025, when hair sample was tested, and October 2, 2025, when blood sample was tested, in accordance with Rule 5510(b) and Rule 5520(a) and (b).

- HISA does not agree. In accordance Rules 3122(b)-(c), "[c]ompliance with the Standards . . . will be sufficient to conclude that the procedures addressed by those Standards were performed properly," and "Laboratories are presumed to have conducted Sample analysis and custodial procedures in accordance with Laboratory Standards." These presumptions were not rebutted by Appellant.

5. UCD's laboratory documentation package, if any, fails because no evidence was offered as to whether the Covered Horse's blood sample was received by UCD was properly secured in accordance with Rule 5510(b) and Rule 5520(a) and (b).

- HISA does not agree. In accordance with Rule 3122(c), "Laboratories are presumed to have conducted Sample analysis and custodial procedures in accordance with Laboratory Standards." This presumption was not rebutted by Appellant.

6. The departure by UCD from Rule 5510(b) is significant because Federal Rule of Evidence 901, which the ALJ may consider as guidance under Rule 7260(d), "requires accounting for [a blood] sample's handling from the time it was first collected until the time it was analyzed." *See* 77 A.L.R. 5th 201.

- HISA does not agree. In accordance with Rule 3122(c), "Laboratories are presumed to have conducted Sample analysis and custodial procedures in accordance with Laboratory Standards." This presumption was not rebutted by Appellant at the IAP hearing. Moreover, Rule 7260 states: "Conformity to legal rules of evidence shall not be necessary, but the Federal Rules of Evidence may be used for guidance."

7. The IAP erroneously admitted in evidence the alleged A Sample and B Sample, with no witness to authenticate them, contrary to 16 C.F.R. 1.146(c)(6)(iii), which allows a party to present sworn oral testimony and documentary evidence but not by documentary evidence alone.

- HISA does not agree. Rule 7260(a) sets forth the requirements for evidence: relevant and material. Further, under subsection (d) of the Rule, it is wholly within the IAP Member's authority to determine the admissibility, relevance, and materiality of the evidence offered, including hearsay evidence.

8. UCD's laboratory documentation package, if any, fails because it does not identify two Certifying Scientists' signatures, rather than two "analysts" signatures, on the laboratory documentation package or on the Certificate of Analysis, and be recorded, which constitutes a departure from the Laboratory Standards in Rule 6315(b).

- HISA does not agree. In accordance with Rule 3122(c), "Laboratories are presumed to have conducted Sample analysis and custodial procedures in accordance with Laboratory Standards." This presumption was not rebutted by Appellant.

9. The IAP erred by not requiring HIWU to provide evidence that the blood sample of the Covered Horse was authenticated or to prove the chain of custody.

- HISA does not agree. In accordance with Rule 3122(c), "Laboratories are presumed to have conducted Sample analysis and custodial procedures in accordance with Laboratory Standards." This presumption was not rebutted by Appellant.

10. Agencies, such as HISA and HIWU, may not violate its own rules, which it has chosen, especially when the internal procedures may be more vigorous than otherwise required. *Morton v. Ruiz*, 415 U.S. 199, 235 (1974).

- HIWU enforces and adheres to the ADMC Program Rules, which were approved by the FTC.

11. Appellant has shown that the Final Ruling of the IAP, with the civil sanctions/ consequences, is "arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law" under 15 U.S.C. § 3058(b)(2)(A)(iii).

- This is Appellant's claim; HISA does not agree.

12. HIWU failed to follow its own rules and regulations, including Rules 3121, 3122(c), 3312, 5510(b), 6308(b), 6309(e), 6315(b) and 7260(d), thereby denying Appellant due process. *Powell v. Heckler*, 789 F.2d 176, 178 (3d Cir. 1986).

- This is Appellant's claim; HISA does not agree.

13. The IAP erroneously found that Appellant did not sufficiently establish "No Fault or Negligence" in accordance with HISA Rule 3324, with Appellant recognizing that it does not apply to the Consequences of the Covered Horse (*i.e.*, disqualification and forfeiture of the purse money).

- This is Appellant's claim; HISA does not agree.

14. The IAP erred in not granting Appellant's multiple requests to obtain a DNA sample as clearly provided by the revisions and clarifications to existing Rule 3133.

- This is Appellant's claim; HISA does not agree.

Conclusion

After a *de novo* review, the Final Ruling of the IAP should be reversed and the charges against Appellant dismissed with prejudice.

- HISA does not agree.

REPLY LEGAL BRIEF

I. HIWU Established Rule 3312 Controlled Medication Rule Violation

Rule 3312(a) states "[i]t is the personal and non-delegable duty of the Responsible Person to ensure that no Controlled Medication Substance is present in the Post-Race Sample of his [ ] Covered Horse[] . . . it is not necessary to demonstrate intent, Fault negligence, or knowing Use

on the part of the Responsible Person in order to establish that the Responsible Person has committed a Rule 3312 Controlled Medication Rule Violation." The Rule goes on to state that "[s]ufficient proof" includes instances in which "the Covered Horse's B Sample is analyzed and the analysis of the B Sample confirms the presence of the Controlled Medication Substance . . . found in the A Sample."[1] Rule 3040(b)(6) further advises that Responsible Persons "bear strict liability for any violations of the Protocol by such Covered Persons (including Veterinarians), employees, personnel, agents, and other Persons involved in the care, treatment, training, or racing of his [ ] Covered Horses."

Appellant's Covered Horse Kikuride participated in Post-Race Testing under the ADMC Program.[2] Kikuride's Sample was sent to the Kenneth L. Maddy Equine Analytical Chemistry Laboratory in Davis, California for analysis, resulting in an Adverse Analytical Finding ("AAF") for the presence of Methocarbamol.[3] The analysis of Kikuride's B Sample by the Equine Integrity and Anti-Doping Sciences Laboratory in Lexington, Kentucky confirmed the presence of Methocarbamol in the Sample.[4] Appellant has presented no evidence to rebut the validity of the AAF either before or during the IAP hearing. Thus, HIWU sufficiently proved that a Rule 3312 Controlled Medication Rule Violation occurred for which Appellant was responsible.

II. Appellant Did Not Establish Entitlement to a Finding of No Fault or Negligence

As it relates to Fault, since this matter involves a Class C Controlled Medication Substance, only Rule 3324 offered Appellant potential relief. Rule 3324 requires the Covered Person to "establish how the Controlled Medication Substance entered the Covered Horse's system as a pre-

[1] ADMC Program Rule 3312(b)(2).
[2] AB, p. 150.
[3] AB, p. 142
[4] AB, p. 166.

condition to [its] application" and limits the Rule's application to "exceptional circumstances."[5] In addition, the Rule "will not apply where the Controlled Medication Substance found to be present in a Sample [] was administered to the Covered Horse by veterinary or other support personnel without the knowledge of the Responsible Person."[6]

Appellant admitted[7] that Kikuride's Veterinarian administered a 20 mg/kg dose of Methocarbamol via intravenous injection 48 hours prior to her race on August 31, 2025.[8] This dose exceeded the 15 mg/kg dose administered to 20 horses during a study of Methocarbamol to determine an appropriate Detection Time of 48 hours.[9] As the definition of Detection Time in Rule 1020 makes clear:

> A Detection Time is not the same as a withdrawal time. The withdrawal time for a medication must be decided upon by a Veterinarian (in consultation with the Responsible Person) and is likely to be based on the Detection Time and an added safety margin. This margin should be determined using professional judgment and discretion to take into account the variability that could be expected to normally occur in a larger population by considering individual differences between horses, such as size, metabolism, fitness, health, or recent illness or disease. The withdrawal interval used for a medication should always be longer than its Detection Time.

The administration of Methocarbamol to Kikuride included no safety margin, as contemplated by the Detection Time. Therefore, Appellant assumed the risk that the Controlled Medication Substance could be detected in Kikuride's Post-Race Sample. Based upon the evidence, the circumstances of Kikuride's AAF stemmed from her Veterinarian's 48-hour administration of a 20 mg/kg dose of Methocarbamol to her and precluded applicability of Rule

[5] ADMC Program Rule 3324(a) & (b).
[6] ADMC Program Rule 3324(b).
[7] ADMC Program Rule 3122 ("Facts related to violations may be established by any reliable means, including admissions.").
[8] AB, pp. 98-118.
[9] AB, pp. 156-158

3324 in accordance with subsection (b)(2). Thus, Appellant could not and did not establish a finding of No Fault or Negligence.

The IAP properly found that Appellant committed his first Class C Controlled Medication Rule Violation and that, pursuant to ADMC Program Rules,[10] he should receive the following Consequences: a $500 fine; automatic disqualification of Kikuride's Race Day results; 1.5 penalty points; and Public Disclosure.

ALL OF WHICH IS RESPECTFULLY SUBMITTED THIS 14th day of May, 2026.

/s/*Bryan H. Beauman*

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[10] ADMC Program Rules 3221, 3223, 3228, and 3331.