

1 select a pre-ordained IAP Member to make the Decision, without any input by Appellant;
2 (6) the IAP Member was without any legal education but was allowed to make legal
3 interpretations concerning (a) the burden of proof, (b) Appellant's defenses including the
4 defense under "No Fault or Negligence" and/or "No Significant Fault or Negligence," and
5 to distinguish the difference between absolute liability and strict liability; (7) the sanctions
6 and penalties ("Consequences") violate "the principles of natural justice," denying
7 Appellant, among other things, of due process and a violation of the private nondelegation
8 doctrine; and (8) the IAP ignored critical, uncontroverted evidence testified to at the hearing
9 on February 17, 2026, by Appellant, as set forth in Appellant's accompanying Notice of
10 Appeal and Applicable for Review.

11 Finally, Appellant was charged for the very first time in his forty-five (45) year, with
12 a purported violation of the ADMC after his veterinarian injected a controlled therapeutic
13 medication, methocarbamol, in a racehorse, Kikuride, trained by Appellant.

14 Appellant is aware of new proposed modifications to the ADMC Program involving,
15 among other things, the General Provisions (1000) and Protocols (3000). Public comment
16 was allowed until February 23, 2026. The proposed modifications are intended to impact
17 the classifications of substances and associated penalties for controlled therapeutic
18 medications. This would entail the creation of a new Class D category for certain
19 medications and would significantly reduce penalties for a first time, low-level finding. It
20 is anticipated, for example, that this may include anti-ulcer medications and perhaps
21 methocarbamol, sold under the brand new Robaxin, which is not designed to enhance
22 performance. Rather, it is presented as a muscle relaxant, used to treat muscle spasms,
23 slowing down nerve activity to allow the body to relax.

24 B. Appellant Will Suffer Irreparable Harm.

25 Appellant will suffer irreparable harm if the stay is not granted inasmuch as he has
26 an unblemished and excellent reputation for honesty and clean racing with the public and
27 the industry over his forty-five (45) years as a trainer. The denial of this stay pending
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1 Appellant’s appeal runs the risk that Appellant’s *de novo* review of that Decision will be
2 reversed by the FTC.

3 C. Degree of Injury to Other Parties or Third Parties.

4 Other parties and third parties, including totally innocent long-time owners of this
5 horse who also own of the best stallions in California, Clubhouse Ride, will have irreparable
6 injury to their reputations, not to mention the loss of the purse, unless the stay is issued
7 pending the *de novo* review and appeal. It would seem that HIWU would have no
8 immediate interest in enforcing the Consequences that resulted from the numerous errors
9 made by the IAP. Indeed, the Decision would be a bad precedent if reversed by the FTC on
10 appeal.

11 D. Whether a Stay is in the Public Interest.

12 The stay is in the public interest because the Decision is replete with errors, which
13 is not beneficial to the public, trainers or owners of horses. It does not serve as a viable
14 precedent. In fact, as the Ninth Circuit stated in *California v. Azar*, 911 F.3d 558, 581
15 (9th Cir. 2018), “the public interest is served by compliance with [administrative rules
16 and procedures].”

18 Dated: March 9, 2026

Respectfully submitted,

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EXHIBIT A

HISA INTERNAL ADJUDICATION PANEL

RULING

ECM 2025-250

In the case of HIWU v. CRAIG LEWIS**Trainer Lewis' Motion to Obtain DNA analysis**

On November 24, 2025, Trainer Lewis filed a Motion to Obtain DNA analysis with this Internal Adjudication Panel. In his Motion, Trainer Lewis argued that Kikuride had never had a Post-Race Adverse Analytical Finding after four races predating her August 31, 2025 race, and had received the same dose of Methocarbamol at the same timing interval as her August 31, 2025 race. Trainer Lewis therefore argued that the Laboratories' reported Adverse Analytical Finding of Kikuride's August 31, 2025 Post-Race Sample was suspect and caused him to doubt the identity of Kikuride's Sample.

HIWU filed its Response to Trainer Lewis' Motion to Obtain DNA analysis on December 3, 2025. In its Response, HIWU argued Trainer Lewis failed to introduce evidence to sufficiently rebut the legal presumption that the custodial procedures and Laboratories' analysis of Kikuride's Samples were conducted in accordance with Laboratory Standards, outlined in HISA Rule Series 6000. Directly addressing Trainer Lewis' argument related to the dose and timing of Methocarbamol administration to Kikuride, HIWU argued Kikuride was only selected for Post-Race testing after one of her earlier races, so it was not reasonable to assume the dose and timing of the Methocarbamol administration were safe.

After reviewing both filings, I make the following ruling:

I hereby DENY Trainer Lewis' Motion to Obtain DNA analysis.

Trainer Lewis has not introduced sufficient evidence to show by a balance of probabilities there is reason to suspect the Sample collected from Kikuride on August 31, 2025, did not actually belong to Kikuride, or that any other reasonable basis exists to conduct DNA Testing on the Covered Horse Kikuride. For that reason, Trainer Lewis' Motion to Obtain DNA analysis is denied.

This Ruling is issued by Internal Adjudication Panel Member

Signature

Date _____

Under the authority granted to IAP members by Horseracing Integrity and Safety Authority Anti-Doping and Medication Control Program Rule 7280.

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CERTIFICATE OF SERVICE

Pursuant to 16 CFR 1.146(a) and 16 CFR 4.4(b), a copy of the Application for Stay is being served this 9th day of March 2026, via first-class mail and/or electronic mail upon the following:

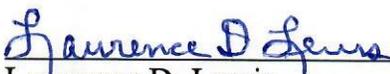
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