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**BEFORE THE ARIZONA STATE
VETERINARY MEDICAL EXAMINING BOARD**

4 ARIZONA STATE VETERINARY)
MEDICAL EXAMINING BOARD) Complaint No. C-21-01
5 vs)
6 Kara Keller / DVM Imposter) **CEASE AND DESIST ORDER**
7)
8)

9 To: Kara Keller
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12 The Arizona State Veterinary Medical Examining Board ("Board") has probable cause to
13 believe that you are impersonating a doctor of veterinary medicine in Arizona. Specifically, in
14 your efforts to obtain employment to provide veterinary services in Arizona, you made several
15 false statements regarding your licensure status and professional experience. Doing so
16 constitutes a violation of A.R.S. § 32-2212 (E), which states in part, no person shall... use the
17 word doctor, veterinary, veterinarian... or any combination thereof of similar import in
18 connection with such person's name...unless such person is licensed to practice veterinary
19 medicine under this chapter; and A.R.S. § 32-2238, which states that a person who practices
20 veterinary medicine or surgery, as defined in A.R.S. §32-2231, without a license and registration,
21 who unlawfully assumes or advertises a veterinary title conveying the impression that the person
22 is a lawful practitioner of veterinary medicine, or who violates any provision of the Veterinary
23 Practice Act is guilty of a Class 1 misdemeanor.

24 By authority under A.R.S. § 32-2237(E), if the Board has probable cause to believe that
25 an unlicensed person is performing acts requiring licensure or violating the Veterinary Practice
Act, it may do any or more of the following:

1. Issue a cease and desist order.
2. Request the county attorney or attorney general to file criminal charges against the person.
3. File an action in superior court to enjoin the person from engaging in the unlicensed practice of veterinary medicine.
4. After notice and an opportunity for a hearing, impose a civil penalty of not more than one thousand dollars for each violation.

THE BOARD ISSUES THIS CEASE AND DESIST ORDER. Kara Keller shall cease from engaging in the impersonation of a veterinarian as defined in A.R.S. § 32-2231 or in any other manner violating the Arizona Veterinary Practice Act. **WARNING:** Should you fail to comply with this Cease and Desist Order at any time, the Board reserves the right to take any of the further legal actions authorized under A.R.S. § 32-2237(E).

NOTICE: Pursuant to section 41-1093.01, Arizona Revised Statutes, an agency shall limit all occupational regulations to regulations that are demonstrated to be necessary to specifically fulfill a public health, safety or welfare concern. Pursuant to sections 41-1093.02 and 41-1093.03, Arizona Revised Statutes, you have the right to petition this agency to repeal or modify the occupational regulation or bring an action in a court of general jurisdiction to challenge the occupational regulation and to ensure compliance with section 41-1093.01, Arizona Revised Statutes.

DATED this 26th day of August 2020.

ARIZONA STATE VETERINARY
MEDICAL EXAMINING BOARD
Jim Loughead, Chairman

Victoria Whitmore

By: Victoria Whitmore, Executive Director

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ORIGINAL of the foregoing filed
DATED this 26th day of August 20 20 with:

Arizona State Veterinarian Medical Examining Board
1740 W. Adams St, Ste. 4600
Phoenix, Arizona 85007

COPY of the foregoing sent by return receipt U.S. mail
DATED this 26th day of August 20 20, to:

Kara Keller
[REDACTED]
[REDACTED]

and

Kara Keller
[REDACTED]
[REDACTED]

and

Kara Keller
[REDACTED]
[REDACTED]

COPY of the foregoing sent via email
DATED this 26th day of August 20 20, to:

[REDACTED]
and
[REDACTED]

COPY of the foregoing sent by interdepartmental or regular mail
DATED this 26th day of August 20 20, to:

Assistant Attorney General's Office
1275 W. Washington CIV/LES
Phoenix AZ 85007

By: *W. Whitmore*

DATED this 26th day of August 20 20.