



State of New Jersey  
DEPARTMENT OF LAW AND PUBLIC SAFETY  
DIVISION OF CONSUMER AFFAIRS  
BOARD OF VETERINARY MEDICAL EXAMINERS  
124 HALSEY STREET, 6TH FLOOR, NEWARK NJ

CHRISTINE TODD WHITMAN  
Governor

DEBORAH T. PORITZ  
Attorney General  
MARK S. HERR  
Director

April 14, 1997

VIA REGULAR AND CERTIFIED  
MAIL RETURN RECEIPT REQUESTED

Mailing Address:  
P.O. Box 45020  
Newark NJ 07101  
(201) 504-6500

Conrad Roblejo, D.V.M.  
Animal Hospital of Somerdale  
408 N. White Horse Pike  
Somerdale, New Jersey 08083

Re: Case Number 96-88  
Michael Alvarez

Dear Dr. Roblejo:

This is to advise you that the New Jersey State Board of Veterinary Medical Examiners has had the opportunity to complete its review of Mr. Alvarez's complaint against you.

Upon review of all of the information presented, including your testimony at the investigative inquiry held on March 26, 1997, the Board found that you committed malpractice in that you declawed the wrong patient.

The Board also found that you engaged in professional misconduct pursuant to *N.J.S.A. 45:1-21(e)* as follows:

(1) You failed to maintain adequate and complete patient records in violation of *N.J.A.C. 13:44-4.9*. The Board noted specifically that the Alvarez records do not include details of the patient's physical examination, his temperature or his heart rate.

(2) You failed to establish a valid veterinarian client/patient relationship in violation of *N.J.A.C. 13:44-4.1(b)*. The Board noted that since, as you testified, your technicians perform in-take procedures, you do not have the opportunity to initiate discussions with or provide disclosures to clients. In this case, in fact, you did not see the complainant's cat until you declawed him.

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At this juncture, the Board has determined that the above violations warrant the initiation of formal disciplinary proceedings against you. Notwithstanding that finding, however, the Board has determined that it will first offer you an opportunity to settle this matter, and thereby avoid the initiation of formal disciplinary proceedings, should you consent to:

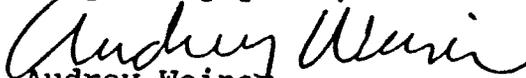
1. Pay a total civil penalty of \$1,100.00 as follows:
  - (a) \$500.00 for malpractice;
  - (b) \$300.00 for failure to maintain adequate and complete patient records;
  - (c) \$300.00 for failure to establish a valid veterinarian client/patient relationship.
2. Pay costs incurred by the Board in the amount of \$55.00.

If you are willing to settle this matter on the offered settlement terms, you may do so by executing the attached form and returning it to the Board within ten (10) days together with your remittance made payable to the Board of Veterinary Medical Examiners in the amount of \$1,155.00 for the civil penalty and costs.

If you wish a formal hearing in this matter, you may request same within ten (10) days of the date of this letter. At the time of hearing, you may appear with counsel of your choice and with witness and documentary evidence. At that time, the Board will not be bound to the terms stated in this letter and may impose any of the sanctions contained in N.J.S.A. 45:1-22 and N.J.S.A. 45:1-25, which include revocation or suspension of licensure and assessment of penalties up to \$2,500.00 per violation. Additionally, the Board may, if the facts warrant, enter an order requiring the restoration of any monies acquired by unlawful acts and the payment of all costs in this matter.

If you do not reply to this letter within the required ten (10) day period, then the Board will make its determination on the evidence in the record and will take such action as may be allowed by law, which may include additional penalties pursuant to N.J.A.C. 13:45C-1.1 based on your failure to respond to official Board correspondence.

Very truly yours,

  
Audrey Weiner  
Assistant Director

AW:jf  
Enclosures  
c Brenda Lewis, DAG

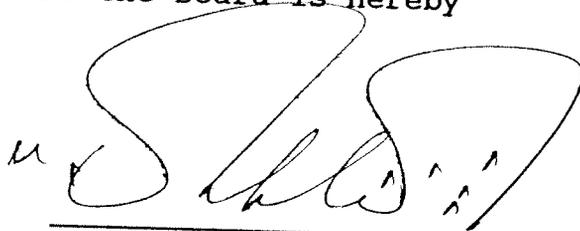
Pd 04/29/97  
Bus ck # 1888  
\$. 1155.00

### CERTIFICATION

*I have received the Board's letter dated April 14, 1997 regarding alleged violations of the Board's enabling act and/or Board regulations.*

**PLEASE CHECK ONE:**

- The allegations set forth therein are acknowledged, and I enclose herewith a check of \$1,155.00 payable to the Veterinary Medical Examiners Board.
- I hereby waive any right which I may have to a hearing in this matter and submit a written statement for the Board's final consideration in this matter.
- A hearing on this matter before the Board is hereby requested.

  
(Signature)

Dated:

4-21-97

CONRAD ROBERTO D.V.M.  
(Print Name)

Case # 96-88

check # 1888