



New Jersey Office of the Attorney General

Division of Consumer Affairs

State Board of Veterinary Medical Examiners

124 Halsey Street, 6th Floor, Newark, NJ 07102



JOHN J. HOFFMAN

Acting Attorney General

CHRIS CHRISTIE

Governor

BY CERTIFIED AND REGULAR MAIL

KIM GUADAGNO

Lt. Governor

January 6, 2015

STEVE C. LEE

Acting Director

Dr. Justin T. Guinan
NorthStar VETS
315 Robbinsville-Allentown Road
Robbinsville, NJ 08691

RECEIVED and FILED by the
NEW JERSEY STATE BOARD OF
VETERINARY MEDICAL EXAMINERS
on this date of: 1-20-15

Mailing Address:

P.O. Box 45020
Newark, NJ 07101
(973) 504-6500

DA

Re: I/M/O JUSTIN T. GUINAN
Unlicensed Practice of Veterinary Medicine
OFFER OF SETTLEMENT IN LIEU OF
FORMAL ACTION

Dear Dr. Guinan:

The New Jersey State Board of Veterinary Medical Examiners (hereinafter referred to as the "Board") received information which indicated that you practiced veterinary medicine in the State of New Jersey after failing to renew your veterinary license by June 30, 2013. The Board has preliminarily concluded that by failing to renew your license timely, and by continuing to practice during the period your license was in an "expired" status, you violated N.J.S.A. 45:16-9 and N.J.S.A. 45:1-7.1(c) by practicing veterinary medicine without an active and valid license to do so. These allegations would support the initiation of civil or administrative proceedings against you seeking injunctive and other relief based on your conduct of unlicensed practice of veterinary medicine in this State.

Prior to commencing formal action, the Board is offering you an opportunity to settle this matter. Please review the terms contained in this letter and if you agree, sign the attached "Acknowledgment and Agreement" and return it to the Board. This letter and the signed Acknowledgment and Agreement will be considered the equivalent of an Order of the Board and will be public information if executed. Once signed, failure to comply with the terms of this agreement will result in further action and additional sanctions.

By resolving this matter through signing the Acknowledgment and Agreement, you will:

1. Admit that you engaged in the unlicensed practice of veterinary medicine in New Jersey and agree to immediately cease and desist from practicing veterinary medicine or otherwise holding yourself out as a veterinarian and/or individuals authorized to administer vaccinations to animals in this State. This includes offering or performing any services defined as the practice of veterinary medicine in the Veterinary Medical Practice Act, specifically, N.J.S.A. 45:16-8.1, unless and until you hold a valid and active license issued by the Board.

2. Agree to pay a civil penalty of \$500.00. You acknowledge and understand the Board will pursue additional sanctions, including enhanced penalties, costs, attorney's fees and contempt based on any new violation.
3. Accept the Board's advice that the Board expects its licensees to complete the required continuing education course work prior to the renewal of the license, and it expects you to make arrangements to comply with this requirement prior to the renewal of your license before June 30, 2015.

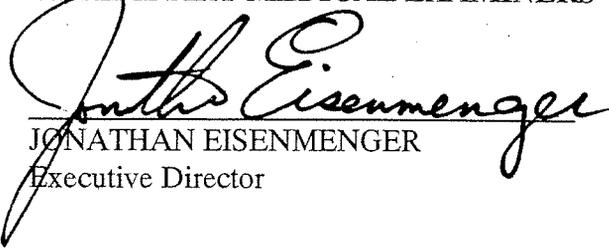
If you agree to these terms, sign the Acknowledgment and Agreement and return it to the Board office for filing. Once filed, a copy will be forwarded to you. You may wish to consult with counsel regarding this offer of settlement.

This settlement offer will remain open to you for fifteen (15) days from the date of this letter. In the event that no response is received from you on or before **Friday, January 30, 2015**, the Board will deem its offer rejected and the offer will be withdrawn. Please be advised that, as stated above, should the Board be required to file a civil or administrative action against you, it will seek penalties in excess of those offered in settlement and may also seek an order requiring you to reimburse certain monies and/or requiring you to pay costs and attorney's fees.

Should you have any questions, concerning this letter or the settlement offer herein, I suggest you contact Deputy Attorney General Olga E. Bradford, who may be reached at (973) 648-3696.

Sincerely,
**NEW JERSEY STATE BOARD OF
VETERINARY MEDICAL EXAMINERS**

By:


JONATHAN EISENMENGER
Executive Director

cc: Olga E. Bradford, Deputy Attorney General

ACKNOWLEDGMENT AND AGREEMENT

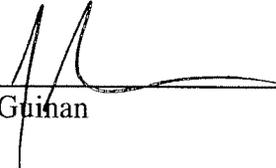
I, **Justin T. Guinan**, admit that I engaged in the practice of veterinary medicine in New Jersey without having an active and valid license to practice in this State as detailed in the letter of January 6, 2015.

I agree that if I engage in the practice of veterinary medicine without a license to practice veterinary medicine, I may be subject to sanctions, including injunctive relief, attorney's fees, and costs.

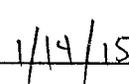
I agree to pay a civil penalty in the amount of \$500 for practicing veterinary medicine in New Jersey without having an active and valid license to practice in this State.

I acknowledge my professional responsibility to complete the required continuing education course work prior to the renewal of my current license in June 2015.

I am aware that by signing this Acknowledgment and Agreement, I am certifying that I have read and understand the settlement proposal offered in the letter from the New Jersey State Board of Veterinary Medical Examiners dated January 6, 2015. I understand that by signing this document, I am waiving any rights I may have to defend myself against the charges of wrongdoing. I am also aware that the action taken against me by the Board is a matter of public record, and that the letter and the Acknowledgment and Agreement are public documents.



Dr. Justin T. Guinan



Date

