



CHRIS CHRISTIE  
Governor

## New Jersey Office of the Attorney General

Division of Consumer Affairs  
State Board of Veterinary Medical Examiners  
124 Halsey Street, 6<sup>th</sup> Floor, Newark, NJ 07102



JOHN J. HOFFMAN  
Acting Attorney General

**BY CERTIFIED AND REGULAR MAIL**

KIM GUADAGNO  
Lt. Governor

June 18, 2015

RECEIVED and FILED by the  
NEW JERSEY STATE BOARD OF  
VETERINARY MEDICAL EXAMINERS  
on this date of: 7-27-15 DA

STEVE C. LEE  
Acting Director

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

Wendy Deaver  
Wendy Deaver Equine Dentistry  
13 Reiner Road  
Cream Ridge, New Jersey 08514

Re: **I/M/O WENDY DEAVER Unlicensed  
Practice of Veterinary Medicine  
Complaint Number: 191419  
OFFER OF SETTLEMENT IN LIEU OF  
FORMAL ACTION**

Dear Ms. Deaver:

The New Jersey State Board of Veterinary Medical Examiners ("Board") received information which indicated that you are offering and/or advertising to provide equine dental procedures, including, but not limited to, dental equilibration, examinations and extractions. A copy of your business card, website advertisement and a recent flyer are attached for your convenience. [See Exhibit A]. The Board has concluded that this conduct constitutes the practice of veterinary medicine, as defined in N.J.S.A. 45:16-8.1. The Board's records indicate that you are not licensed by it as a veterinarian in the State of New Jersey. Hence, you are not authorized to perform or offer to perform these veterinary medical services in this State. These allegations would support the initiation of civil or administrative proceedings seeking injunctive and other relief based on the finding of an unlicensed practice of veterinary medicine charge 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 an individual authorized to provide equine dentistry procedures to animals in this State. This includes offering and/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 **\$5,000.00**, payment of which shall be stayed for a period of five (5) years. If no further violations are found during that period, the penalty shall be rescinded. You further agree that if during that period, you are found to have violated the terms of this agreement or any provisions of the Veterinary Medical Practice Act or regulations promulgated under that Act, the \$5,000.00 penalty will become due. 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. Agree that should you make an application for licensure, you will appear before the Board to discuss your activities prior to licensure. You further agree and understand that should your application for a license be granted, the Board specifically reserves the right to impose restrictions on your practice as may be necessary to ensure the public health, safety and welfare.

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.

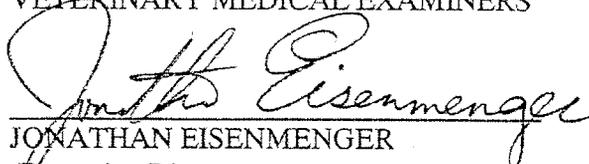
This settlement offer will remain open to you for **twenty (20) days** from the date of this letter. In the event that no response is received from you on or before **Monday, July 12, 2015**, the Board will deem its offer rejected and the offer will be withdrawn.

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 yours,  
NEW JERSEY STATE BOARD OF  
VETERINARY MEDICAL EXAMINERS

By:

  
JONATHAN EISENMENGER  
Executive Director

cc: Olga E. Bradford, Deputy Attorney General

ACKNOWLEDGMENT AND AGREEMENT

I, WENDY DEAVER, admit that I engaged in the practice of veterinary medicine in New Jersey without having obtained a license to practice in this State as detailed in the letter of June 18, 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 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 June 18, 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.

  
\_\_\_\_\_  
WENDY DEAVER

7-23-15  
\_\_\_\_\_  
Date