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7 RICHARD BALTAS

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF LOS ANGELES**

10  
11  
12 RICHARD BALTAS, an individual

13 Plaintiff,

14 v.

15 CALIFORNIA HORSE RACING BOARD; DR.  
GREGORY L. FERRARO, in his capacity as the  
16 Chairman of the California Horse Racing Board;  
SCOTT CHANEY, in his capacity as the Executive  
17 Director of the California Horse Racing Board;  
OSCAR GONZALEZ, DENNIS V. ALFIERI,  
18 DAMASCUS CASTELLANOS, BRENDA  
WASHINGTON DAVIS, THOMAS C. HUDNUT,  
19 and WENDY MITCHELL, in their official  
capacities as members of the California Horse  
20 Racing Board and DOES 1 through 100,

21 Defendants.

Case No. 22STCV26668

**VERIFIED COMPLAINT FOR  
DEPRIVATION OF SUBSTANTIVE  
AND PROCEDURAL DUE PROCESS  
RIGHTS; DECLARATORY AND  
INJUNCTIVE RELIEF, AND FOR  
DAMAGES**

**DEMAND FOR JURY TRIAL**

22  
23 **TO THIS HONORABLE COURT, THE PARTIES AND THEIR COUNSEL OF RECORD:**

24 **PLEASE TAKE NOTICE** that Plaintiff Richard Baltas ("Baltas") hereby files this  
25 Complaint and alleges as follows:  
26  
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28

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1 **I. THE PARTIES**

2 1. Baltas, at all times mentioned in this pleading, has been and now is licensed as a horse  
3 trainer, under the license issued by the CHRB, License No. 232550-5/2022, and has been engaged in  
4 the profession of horse training in the State of California.

5 2. At all times mentioned in this pleading, the CHRB has been and is now the agency  
6 charged with administering California Business and Professions Code ("BPC") § 19400 et seq. and  
7 the California Horse Racing rules ("CHRB Rules").

8 3. Defendant Dr. Gregory Ferrero is now and at all times relevant hereto was the  
9 Chairman of the CHRB and at all times mentioned herein was acting in his official capacity in doing  
10 the things hereinafter alleged.

11 4. Defendant Oscar Gonzales is now and at all relevant times hereto was the Vice  
12 Chairman of the CHRB and all times mentioned herein was acting in his official capacity in doing  
13 the thing hereafter alleged.

14 5. Defendant Scott Chaney ("Chaney") is now and at all times relevant hereto was the  
15 Executive Director of the CHRB and at all times mentioned herein was acting in his official capacity  
16 in doing the things hereinafter alleged.

17 6. Defendant Dennis V. Alfieri is now and at all times relevant hereto was a member of  
18 the CHRB and at all times mentioned herein was acting in his official capacity in doing the things  
19 hereinafter alleged.

20 7. Defendant Damascus Castellanos is now and at all times relevant hereto was a  
21 member of the CHRB and at all times mentioned herein was acting in his official capacity in doing  
22 the things hereinafter alleged.

23 8. Defendant Brenda Washington Davis is now and at all times relevant hereto was a  
24 member of the CHRB and at all times mentioned herein was acting in her official capacity in doing  
25 the things hereinafter alleged.

26 9. Defendant Thomas C. Hudnut is now and at all times relevant hereto was a member  
27 of the CHRB and at all times mentioned herein was acting in his official capacity in doing the things  
28 hereinafter alleged.

1 10. Defendant Wendy Mitchell is now and at all times relevant hereto was a member of  
2 the CHRFB and at all times mentioned herein was acting in her official capacity in doing the things  
3 hereinafter alleged.

4 11. The CHRFB, its Chairman, its Vice Chairman, its Executive Director, and its  
5 Members, identified above, are collectively referred to throughout this pleading as the CHRFB  
6 "Agents."

7 12. The true names and capacities of defendants named as Doe 1 through Doe 100,  
8 inclusive, are presently unknown to Baltas. Baltas will amend this pleading, setting forth the true  
9 names and capacities of these fictitious defendants when they are ascertained. Baltas is informed and  
10 believes and, on that basis, alleges that each of the fictitious defendants has participated in the acts  
11 alleged in this pleading to have been done by the named defendants. Each reference in this pleading  
12 to "Agents," or a specifically named agent refers also to all and defendants sued under fictitious  
13 names.

## 14 II. INTRODUCTION

15 13. Baltas is among the nation's preeminent thoroughbred trainers. He has had hundreds  
16 of horses under his care and has been the trainer of record in thousands of races. In 2008, Baltas had  
17 a horse called Noble Reflection scheduled to run in the 10th race at Santa Anita Park ("Santa Anita")  
18 on May 8, 2022. A few hours before the race, one of Baltas' employees were seen on videotape  
19 administering an oral dose syringe into the horse's mouth. A syringe was subsequently recovered  
20 from a feed bag that was tested and had allegedly traces of Higenamine and Paeonol, which are  
21 organic liquids that are found naturally in Chinese herbs. Notably, after Noble Reflection was  
22 scratched from the race, it was tested and the test results were "clean," and neither Higenamine nor  
23 Paeonol were found in the horse.  
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1 III. FACTUAL SUMMARY

2 14. Based on the film footage of Noble Reflection, Santa Anita went back and reviewed  
3 footage of Baltas' trained horses from earlier dates and allegedly found 22 other times when a Baltas  
4 employee squirted a substance in a horse's mouth. Unlike the situation with Noble Reflection, there  
5 was no syringe found in the other 21 instances to be tested. Instead, the CHRB *assumed* the  
6 substance in the other 22 cases going back to April 15, 2022, was the same that was found in or on  
7 the outside of the syringe found on May 8, 2022. . None of the 21 horses that raced ever tested  
8 positive for a Controlled or Prohibited Substance.  
9

10 15. On May 10, 2022, the Santa Anita and/or the CHRB and its agents went back  
11 retroactively to review videotaped footage of Baltas' horses from April 15, 2022, up through May 8,  
12 2022, and allegedly saw 22 horses trained by Baltas receiving an orally administered liquid that they  
13 contend was "X-Treme Air Boost", which is a product advertised for use in horses in the Santa Anita  
14 Condition Book. The CHRB has never explained its decision for going back in time to find  
15 violations in the past, and its conduct demonstrates that they and/or the Defendants herein intended  
16 to target Baltas to find as many violations as possible. Such conduct demonstrates malice and  
17 oppression on the part of the CHRB and its Agents. Although no syringe was located in the 22 other  
18 cases, the CHRB assumed the product was X-Treme Air Boost. As noted, above, . As noted above,  
19 none of the 21 horses that raced ever tested positive for a Controlled or Prohibited Substance.  
20 Because the ingredients in question are food which are expressly excepted under Rule 1843.5; that is,  
21 they are not within the Statue or any ruling of this Court.  
22

23  
24 16. Based on these facts, on May 10, 2022, Aidan Butler, the Chief Executive Officer of  
25 the 1/ST, the owner of Santa Anita Park, acting on behalf of Santa Anita, notified Baltas that he was  
26 prevented from entering any horses at Santa Anita.  
27  
28

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1           17.     On June 22, 2022, the CHRBR filed an Ex Parte Application with the Stewards at the  
2 Los Alamitos Racetrack (“Los Alamitos”) to refuse the entry of two horses trained by Baltas named  
3 “Parco” and “Candy for Carmel” to race at Los Alamitos. Per all CHRBR’s and all Racing Association  
4 Rules, both horses were eligible to race. The Stewards at Los Alamitos summarily denied these two  
5 entrees without a hearing or any form of due process. The denial constituted a *de facto* summary  
6 suspension that failed to comply with the requirements of Article 13 of the Administrative  
7 Procedures Act that is applicable to inform or temporary suspension (Gov. Code § 11460.10, et seq.).  
8 Los Alamitos conduct also violated two California Supreme Court cases, in which the Court held  
9 that due process safeguards must be followed before interfering with “vested fundamental rights” of  
10 an individual such as Baltas, to practice his licensed profession (*Bixby v. Pierno* (1981) 4 Cal. 3d  
11 1360, 1369), and that the rights of individuals to have notice and a meaningful hearing must be  
12 conducted *before* there could be a significant deprivation of rights are caused by a private party as  
13 well as a governmental body (*Pinkster v. Pacific Coast Soc. Of Ortho Dentists*, (1969) 1 Cal. 3d 160,  
14 165-166).

15  
16  
17           18.     The CHRBR thereafter followed suit, and ultimately mandated that Baltas may not  
18 enter any horses in the State of California, such that Baltas has not been allowed to enter a horse in  
19 the State of California from May 8, 2022 through the present date, causing him harm.

20  
21           19.     On June 29, 2022, Churchill Downs issued a *de facto* suspension to Baltas, a decision  
22 made, once again, without any due process. Baltas was treated by the Churchill Downs and the  
23 Defendants as “guilty,” based solely on an allegation, and without any consideration to the alleged  
24 harm he would suffer.

25           **A. CHRBR RULE 1843.5**

26           20.     On June 24, 2022, Baltas’ counsel served discovery on the CHRBR. To date, the  
27 CHRBR has not complied in full with this discovery, thereby forcing Baltas to proceed with  
28

1 information and documents that are being withheld and concealed from him, all of which violated  
2 Baltas substantive and procedural due process rights.

3           21. Before June 21, 2022, Executive Director Scott Chaney (Chaney”) represented to  
4 then Baltas the attorney, Darrell Vienna, that any complaint filed by the CHRB against Baltas would  
5 not contain alleged violations related to prohibited substances. Then on June 21, 2022, the CHRB  
6 filed a 47 count complaint which, much to the surprise of Attorney Vienna and his former client  
7 Baltas, not only contained 23 counts of violations of CHRB Rule 1843.5, but, contrary to the  
8 representations made by Chaney on behalf of the CHRB, but also contained 23 counts of violations  
9 of CHRB Rule 1887 (a) (the so called “Trainer Insurer Rule”) which included references to  
10 Higenamine and Paeonol, plus one count of a violation of CHRB Rule 1902, which is short titled as  
11 “Conduct Detrimental to Horse Racing.” Although Baltas’ representative complained that Chaney  
12 did not honor the representations were made, and that CHRB Rule 1887(a) requires a finding of a  
13 prohibited drug substance, the CHRB filed a Complaint that contradicted Chaney’s prior  
14 representations. None of the counts in the CHRB Complaint are valid, and each of them reflect a  
15 malicious intent by the Defendants, and each of them herein. Neither Chaney nor the CHRB ever  
16 explained why they reneged on Chaney’s representation and the Baltas/CHRB agreement that the  
17 complaint would not allege violations related to prohibited substances.  
18

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21           22. As a result, of the CHRB’s conduct, Baltas could not enter any horses at California  
22 racetracks from May 8, 2022 through the present date, thereby costing him many thousands if not  
23 hundreds of thousands of dollars, and stands to lose many millions of dollars in damages in an  
24 amount to be determined at jury trial for lost earnings, the loss of clients who entrusted their horses  
25 training to him, and an irrevocable damage to his reputation. In a shocking conversation, Chaney  
26 suggested to Baltas, through his former counsel, that the CHRB would accept a one-year suspension,  
27 and possibly credit Baltas for the two months served which was the time frame from which Baltas  
28

1 had not been allowed to enter any horses in the State, which is wildly excessive and disparate to any  
2 other trainer punishment imposed by the CHRB, and was obviously punitive in nature in that it  
3 would effectively terminate Baltas' career as a trainer. Others facing similar charges arising out of  
4 CHRB Rule 1843.5 in the past received far more lenient sentences, including monetary fines in lieu  
5 of a year-long license suspension.  
6

7 23. California Code Regs. Title 4 § 1843.5 provides, in relevant part, as follows:

8 Section 1843.5 - Medication, Drugs and Other Substances Permitted After Entry in a Race

- 9 a. In this article a horse is deemed "entered" in a race 48 hours before post time of the  
10 running of the race.  
11 b. *Water, hay, and grain may be provided to the horse up until post time.*  
12 c. Drugs, medications or any other substances shall not be administered by any means to  
13 a horse after it is deemed entered to race except:  
14 i. Topical medications, (such as antiseptics, ointments, salves, leg rubs, leg  
15 paints' hoof dressings, liniments and antiphlogistics) which do not contain  
16 anesthetics or other prohibited drugs.  
17 d. Any drug, medication or any substance found in a test sample *taken from a horse*  
18 which is not authorized under this rule shall be deemed a prohibited drug substance.  
19 \* \* \* \* \*  
20  
21 g. In addition to the substances named in subsection (c) (1). Any of the following  
22 substances may be administered under Rule 1845 of this division within 24 hours of  
23 the post time of the race in which the horse is entered:  
24 i. Furosemide;  
25 ii. Only water may be used to wash the horse's mouth on race day.  
26  
27  
28

1 h. Drugs, medications, or any other substances may not be administered to a horse by  
2 injection, via nasogastric tube (stomach tubing) or any other means after the horse is  
3 entered to race, except under these regulations. [Emphasis added.]  
4

5 24. As to Noble Reflection, Baltas' employee Martin Valenzuela ("Valenzuela") did  
6 provide X-Treme Air Boost Paste to Noble Reflection because the horse bleeds. Valenzuela  
7 explained that the paste, which is advertised in Santa Anita's own Condition Book helps prevent the  
8 horse from bleeding. In light of the publicity associated with horses dying or being mistreated,  
9 Baltas has authorized the use of this product for the safety of the horse in question, but always to be  
10 applied ~~well in~~ 3 to 4 days in advance of the horses race day, and in compliance with CHRB Rule  
11 1843.5, such that Valenzuela, and not Baltas, *mistakenly* administered on race day, which was  
12 contrary to Baltas instructions to administer the product will in advance of race day in compliance  
13 with CHRB Rule 1843.5. Thus, Valenzuela acted contrary to Baltas' instructions and without Baltas'  
14 knowledge or consent

15 25. The manufacturer of X-Treme Air Boost has confirmed that their product does not  
16 contain Higenamine and Paeonol. Notably, only 1 of 23 horses at issues ~~that~~ involved the CHRB  
17 locating and testing a syringe. Any assumption by the CHRB that the syringe that was applied in the  
18 other 22 horses. and substance named in the Complaint. X-Treme Air Boost is exactly that – an  
19 assumption. The reason for the CHRB's retroactive investigation is that Baltas is being targeted by  
20 the Defendants to deprive his of his right to use his license in a way that is motivated by malice and  
21 oppression on the part of the CHRB and its Agents.

22 26. The two ingredients allegedly found on the syringe believed to be used in treating  
23 Noble Reflection are allegedly "Higenamine" and "Paeonol." Notably both of these ingredients are  
24 derived from organic, Chinese herbal products used to treat or benefit horses for various health  
25 reasons, and neither ingredient is identified or listed as a "Controlled and/or Prohibited Substance"  
26 under the Uniform Classification Guideline for Foreign Substance and Recommended Penalties  
27 Model Rule as promulgated by the Association of Racing Commissioners Intention ("ARCI"). For  
28 example, Higenamine is 100% organic, not a drug, and is found in a variety of *plants* including  
Nandina domestica (fruit), aconitum carmichaelii (root), Asarum heterotropioides, Galium



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1 divaricatum (stem and vine), and Annona squamosa, and Nelumbo nucifera (lotus seeds). Similarly,  
2 Paeonol is also not a drug, also purely organic, and comes from Nandina domestica.

3 27. Neither of these natural herbal products are performing enhancing in horses, and both  
4 fall within the exception of CHRB Rule 1843.5 allowing water and food, as both are organic foods;  
5 both of which are allowable on race day under Rule 1843.5.

6 28. Another express exception to CHRB rule is found at 1843.5 (g)(2) which provide,  
7 "Only water may be used to wash the horse's mouth on race day." Many horses develop dry mouth  
8 when they run, which can impede their breathing. To address this issue, and for the comfort and  
9 safety of the horse, Baltas asks his employees on race day to squirt water into the horse's mouth with  
10 an oral dose syringe, as it is often easier way to apply water into a horse mouth than it is to get them  
11 to drink from a hose when they are not thirsty. Often empty syringes from X-Treme Air Boost ~~and~~  
12 ~~Calm and Cool~~ are reused to shoot water into the horse's mouth. Such conduct falls expressly within  
13 the allowed exception to CHRB Rule 1843.5.

14 B. CHRB RULE 1887(a)

15 29. Baltas is charged with twenty-three (23) counts of violating CHRB Rule 1887(a), the  
16 so-called "Trainer Insurer Rule," Rule 1887(a) provides, in relevant part:

17 "(a) The trainer is the absolute trainer of and responsible for the condition of  
18 horses entered in a race, *regardless of the acts of third parties*, except as  
19 otherwise provided in this article. If the chemical or other analysis of urine or  
20 blood test samples or other tests, prove positive showing the presence of any  
21 prohibited drug substance defined in Rule 1842.1 of this division, the trainer  
22 of the horse may be fined, his/her license suspended or revoked, or be rules  
23 off. In addition, the owner of the horse, foreman in charge of the horse, groom,  
24 and any other person shown to have had the care or attendance of the horse,  
25 may be fined, his/her license suspended, revoked, or be ruled off. The owner  
26 of a ship-in horse is the joint-absolute insurer of and is equally responsible for  
27 the condition of the horse entered in a race." [Emphasis added.]  
28

1 C. CHRB RULE 1888

2 30. CHRB Rule 1888, "Defense of Trainer Insurer Rule," provides, in relevant part:  
3 "A trainer or other person charged with a violation of Rule 1887 of this division may  
4 defend, mitigate or appeal the charge if:

5 (a) He was not, before the commencement of any proceeding against him,  
6 informed of the charges being brought against him;

7 (b) He was not permitted counsel, representation or an advisor of his choosing  
8 in any hearing before the stewards concerning the charges;

9 (c) He shows, by a preponderance of evidence, that he made every reasonable  
10 effort to protect the horses in his care from tampering by unauthorized persons; and

11 (d) He was not permitted to introduce evidence in his own behalf before any  
12 finding or ruling was made against him. Nothing herein shall require that the stewards  
13 permit cross-examination of any witness appearing before them, or issue subpoenas  
14 for the attendance of witnesses. [Emphasis added.]

15 31. Baltas has been adversely affected by the Defendants' unconstitutional application of  
16 CHRB Rule 1888 and will continue to be adversely affected for as long as the CHRB Rule 1888 as  
17 applied by Defendants is allowed to remain in effect and continues to be enforced in an illegal  
18 manner.

19 32. In this case, The CHRB has and does unconstitutionally hold trainers responsible for  
20 anything that is done under their care. CHRB Rule 1887(a) has come under increasing criticism  
21 throughout the country on Constitutional and fairness grounds. California courts have recognized  
22 that any strict liability standard for criminal or quasi-criminal conduct is unconstitutional, so the  
23 California Trainer Insurer Rule was changed (on its face, at least) to allow trainers to defend  
24 themselves by showing that they took reasonable steps to prevent employees from tampering with  
25 his horses. However, this defense was rendered illusory by a Board that made it impossible to mount  
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1 such a defense and thus denied Baltas due process. Moreover, a plain reading of section 1887 reveals  
2 that it does not apply here because the Rule is only to be applied when

3 “ . . . [C]hemical or other analyses of urine or blood test samples or other tests, prove  
4 positive showing the presence of any Prohibited Drug Substance defined in Rule  
5 1843.1 of this division.”

6 33. CHRBRule 1843.1 provides, in relevant part:

7 “For purposes of this division, prohibited drug substances means (a) any drug,  
8 substance, medication or chemical foreign to the horse, whether natural or synthetic,  
9 or metabolite or analog thereof, whose use is not expressly authorized in this article.

10 (b) any drug, substance, medical or chemical authorized by this article in excess of the  
11 authorized level or other restrictions as set forth in this article.”

12 Because Higenamine and Paeonol, do not qualify as a prohibitive drug substance under CHRBRule  
13 1843.1, all of the CHRBR claims asserted against Baltas arising out of 1887(a) are improper.

14 34. The CHRBR’s motivation for punishing Baltas is based on the fact that Baltas  
15 exercised his First Amendment Rights by being vocal against CHRBR Officials, and other trainers  
16 who use drugs to enhance the speed of horses in an unsafe manner.

17 35. Having held Baltas responsible without any proof of culpability, and suggesting  
18 Baltas take a one-year suspension of his license, the CHRBR and its Agents seek to impose a penalty  
19 against Baltas that is unprecedented, excessive, and is being imposed by its Agents maliciously. This  
20 draconian punishment is substantially greater than any prior punishment imposed by the CHRBR and  
21 its Agents, particularly in light of the fact that ~~the~~ not a single one of Baltas’ horses in this matter  
22 tested positive. Such punishment not only violates Baltas’ due process rights, but is a violation of  
23 Balatas’ rights under 49 U.S.C 1883, the Fourteenth Amendment of the United States Constitution,  
24 and Article I, §7, of the California Constitution.

25 36. CHRBRule 1887(a), as implemented by Respondents and their agents, is  
26 unconstitutional in that it violates Baltas’ rights to due process of the law as guaranteed by the  
27 Fourteenth Amendment of the United States Constitution and 42 U.S.C. § 1883. Defendants  
28

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1 essentially require a trainer to insure 24-hour video surveillance over every horse he trains as a  
2 precondition to utilizing the CHRB Rule 1888 defense against strict liability. Defendants have,  
3 therefore, made it impossible for an innocent trainer who has not violated any regulations to avoid  
4 being use of penalized. By their actions, Defendants have also unfairly enacted absolute  
5 preconditions for the use of CHRB Rule actions, 1888 defense without have having given trainers  
6 any advance notice of these preconditions. As a result, Defendants' application of the rule is  
7 manifestly unreasonable, arbitrary and capricious, and has no real or substantial relation to public  
8 health, safety, morals, or general welfare.

10 37. The record below clearly demonstrates that the CHRB used an unconstitutional strict  
11 liability rule to impose a severe penalty on Baltas. Defendants essentially require a trainer to ensure  
12 24-hour video surveillance over every horse he or she trains a pre-condition to utilizing the CHRB  
13 Rule 1888 defense to strict liability. Thus, even though there is no evidence that Baltas' trainer had  
14 done any wrong, the CHRB exacerbated the facial unconstitutionality of the Trainer Insurer Rule by  
15 eviscerating the one defense to strict liability. It then threatened to impose a punishment that bore no  
16 responsibility to the alleged crime – a punishment that was dramatically increased by the CHRB  
17 without any hearing. In doing so, the CHRB violated its own Rules, the laws and Constitution of the  
18 state of California and the United States Constitution.

19 38. The one-year suspension of Baltas license during which Baltas would have been  
20 prevented from entering horses is unprecedented and is the equivalent of a death sentence to a horse  
21 trainer. If such a suspension is entered here, Baltas will lose his horses, his barn, his clients, his  
22 livelihood, and his career. Additionally, the imposition of such a draconian sentence would represent  
23 a wildly excessive and disparate penalty when compared to prior punishments handed out by the  
24 CHRB in similar cases, which have often been handled with the imposition of a monetary fine or a  
25 sentence for shorter disciplinary cases than the three months (e.g., Carla Gaines being fined for a  
26 dollar amount), as opposed to Baltas, who faces a year-long suspension, which is a punishment that  
27 would be tantamount to ending Baltas' career as a horse trainer.

28

1           39.     By contrast, Baltas has already been deprived of entering horses despite the  
2 nonexistence of any adverse ruling following a hearing against him, and despite the fact that he has  
3 had no opportunity to testify, to call witnesses for his behalf, to submit evidence, to cross-examine  
4 his accusers, or to have the advantage of a full and fair hearing, assuming the CHRB and its Agents,  
5 the Board of Standards, are capable of giving Baltas a fair hearing which remains to be seen. Baltas  
6 reserves the right to amend this Complaint to name any hearing officer who in any way is biased  
7 against him or who in any way impedes his right to a fair hearing.

8           **D.     SECTION 1902 – CONDUCT DETRIMENTAL TO HORSE RACING**

9           40.     Baltas is also charged with a violation of CHRB Rule 1902. Rule 1902 provides, in  
10 relevant part:

11                    “No licensee shall engage in any conduct prohibited by this division, nor shall  
12 any licensee engage in any conduct which by its nature is detrimental to the best  
13 interests of horse racing including, but not limited to:

- 14                   (a) knowing association with any known bookmaker, known tout, or known felon,  
15                   (b) indictment or arrest for a crime involving moral turpitude or which is punishable  
16 by imprisonment in the state or federal prison, when such indictment or arrest is the  
17 subject of notorious or widespread publicity in the news media, and when there is  
18 probable cause to believe the licensee committed the offenses charged,  
19                   (c) solicitation of or aiding and abetting any other person to participate in any act or  
20 conduct prohibited by this division.”

21  
22           **E.     THE CHRB COMPLAINT**

23           41.     The addition of CHRB Rule 1902 is, for lack of a better term, piling on” Baltas. The  
24 Rule requires either:

- 25                   (a) knowing association with any known bookmaker, known tout, or known felon,

26                   [Not present here.]

- 27                   (b) indictment or arrest for a crime involving moral turpitude or which is punishable  
28 by imprisonment in the state or federal prison, when such indictment or arrest is the

1 subject of notorious or widespread publicity in the news media, and when there is  
2 probable cause to believe the licensee committed the offenses charged, [Again, no  
3 allegation the CHRB Complaint.]

4 (c) solicitation of or aiding and abetting any other person to participate in any act or  
5 conduct prohibited by this division. [No aiding and abetting are alleged in the  
6 Complaint against Baltras]. [Emphasis added.]

7  
8 In California, the term “moral turpitude” refers to categories of crimes that involve dishonesty, or a  
9 base, vile, or depraved conduct that is shocking to a reasonable person such as murder,  
10 embezzlement, burglary, robbery, perjury, and aggravated assault.

11 42. On or about June 21, 2022, under the Business & Profession Code section 19420 and  
12 a certain Complaint filed by CHRB, alleging that Baltas violated CHRB Rules 1843.5, 1887(a), and  
13 1902.

14 43. The CHRB Complaint, Exhibit A, is invalid under CCP § 1094.5 for at least the  
15 following reasons:

16 a. As noted above, based on the allegations in the Complaint, Baltas was offered  
17 a year-long suspension in lieu of a hearing or an opportunity to present evidence. The CHRB  
18 demand was excessively high, particularly given the complete lack of evidence that the  
19 condition of any of the 23 horses in question was affected, none of the 23 tested positive for  
20 prohibited substances or even organic substances such as Higenamine and Paeonol.

21 b. The CHRB ignored the CHRB Rules and prior precedent relevant to the  
22 imposing of penalties for the alleged violation. Moreover, similarly situated trainers were  
23 treated with much more lenience than Baltas for offenses that actually harmed the horses in  
24 question.

25 c. The CHRB’s charges fails to abide by the text or spirit of the CHRB Rule  
26 1888. The CHRB’s Trainer Insurer Rule, Rule 1887(a), states that “[t]he trainer is the  
27 absolute insurer of and responsible for the condition of the horses entered in a race, regardless  
28 of the acts of third parties, except as otherwise provided in this article.” In order to protect

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1 the due process rights of the trainers, however, CHRBR Rule 1888 allows a trainer to defend  
2 against a charge by showing "by a preponderance of evidence, that he made every reasonable  
3 effort to protect the horses in his care from tampering by unauthorized persons." The CHRBR's  
4 Decision wholly ignores the due process rights which underlie CHRBR Rule 1888.

5 d. The CHRBR Rules regarding conflict of interests, on their face and as applied  
6 by the CHRBR, violated Baltas' rights to due process under the California and Federal  
7 Constitution by allowing CHRBR consultants and officers and experts with clearly  
8 demonstrated bias to participate in the testing of Baltas' horses and in the prosecution of  
9 accusation against him.

10 e. The CHRBR was biased against Baltas and prejudged this case. Prior to the  
11 hearing, the CHRBR's representatives made inflammatory comments to the press that reveal the  
12 CHRBR's bias. Among other things, the CHRBR, acting through its Agents, strongly inferred  
13 that Baltas was guilty of all charges, thereby irrevocably damaging Baltas' reputation and  
14 career.

15 44. By the foregoing acts, the CHRBR denied Baltas substantive and procedural due  
16 process guaranteed under 49 U.S.C. 1983.

17 45. By the foregoing actions, the CHRBR denied Baltas substantive and procedural due  
18 process guaranteed to him under the California Constitution, Article 1, section 7.

19 46. By the foregoing actions, the CHRBR denied Baltas substantive and procedural due  
20 process guaranteed to him under the Fourteenth Amendment to the United States Constitution.

21 47. Baltas has or is in the process of exhausting all available administrative remedies  
22 required by the CHRBR, has no appeal, and this lawsuit may proceed pursuant to BPC § 19463.

23 48. As a result of the CHRBR's action, Baltas has already sustained hundreds of dollars if  
24 not thousands of dollars in damages resulting from his inability to practice his trade of horse training.  
25 If Baltas is suspended for a full year, he will lose all his horses, his livelihood, and his career, which  
26 will be shown through expert testimony at trial to be an amount of many, many million of dollars,  
27 but not less than \$10,000,000. The CHRBR, and other defendants named herein are liable for these  
28 damages under CCP § 1095, 42 U.S.C. 1983, California Constitution Art. 1, §7.

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**FIRST CAUSE OF ACTION**

(Deprivation of Substantive Due Process – United States Constitution, 14<sup>th</sup> Amendment, 42 U.S.C. and § 1983 – Against All Defendants, and DOES 1 through 100)

49. Baltas realleges the allegations set forth in paragraphs 1 through 48, above, each of which are incorporated by reference as if fully set forth herein.

50. Baltas possesses a constitutionally protected property interest in his license to engage in his profession as a horse trainer.

51. Baltas at all times mentioned herein had a right under the Fourteenth Amendment of the United States Constitution and 42 U.S.C. § 1983 to substantive due process in administrative determinations made under color of state laws.

52. At all times mentioned herein, Defendants, and each of them, participated in the acts of the CHRB addressed herein as Agents of the CHRB and, in doing so, acted in their official capacity under color of state law.

53. CHRB Rule 1887(a), states, in relevant part “[t]he trainer is the absolute insurer of and responsible for the condition of the horses entered in a race, regardless of the acts of third parties, except as otherwise provided in this article.” Thus, Rule 1887(a) allows strict liability penalties against a trainer even for acts of third parties of which the trainer had no knowledge, except as provided in CHRB Rule 1888. Among other things, CHRB Rule 1888 allows a trainer the option to defend against a charge by showing “by a preponderance of evidence, that he made every reasonable effort to protect the horses in his care from tampering by unauthorized persons.”

54. CHRB Rule 1888(a), as implemented by their Agents, is unconstitutional in that it violates Baltas’ rights to due process of the law as guaranteed by the Fourteenth Amendment of the United States Constitution and 42 U.S.C. § 1983. By their actions, Defendants have also unfairly enacted absolute preconditions for the use of the CHRB Rule 1888 defense without having given trainers any advanced notice of these preconditions. As a result, Defendants’ application of the rule



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1 is manifestly unreasonable, arbitrary and capricious, and has no real or substantial relation to public  
2 health, safety, morals, or general welfare.

3 55. In addition, CHRB 1843.5 as implemented by the CHRB and its Agents, violates  
4 Baltas' right to due process of the law as guaranteed in the by their application of the Fourteenth  
5 Amendment of the United States Constitution, 42 U.S.C. § 1983, and Article I, §7, of the California  
6 Constitution.

7 56. Baltas has been adversely affected by the Defendants' unconstitutional application of  
8 CHRB Rule 1888 and will continue to be adversely affected for as long as the CHRB Rule 1888 as  
9 applied by Defendants is allowed to remain in effect and continues to be enforced and as long as  
10 Defendants' Decision remains in force.

11 57. Baltas is entitled to declaratory and/or other equitable relief, including but not limited  
12 to, an injunction or other appropriate order directing Defendants to set aside the complaint  
13 manifested by their application of CHRB Rules 1846.5 and 1887(a) that is an unlawful and  
14 unconstitutional adjudication in violation of the. Fourteenth Amendment of the United States  
15 Constitution and 42 U.S.C. § 1983.

16 **SECOND CAUSE OF ACTION**

17 (Deprivation of Procedural Due Process - United States Constitution, 141h Amendment, 42  
18 U.S.C. § 1983, and California Constitution Article I, §7 – By Plaintiff Baltas Against All  
19 Defendants)

20 58. Baltas realleges the allegations set forth in paragraphs 1 through 57 above, each of  
21 which are incorporated by reference as if fully set forth herein.

22 59. Baltas at all times mentioned herein had a right under the Fourteenth Amendment of  
23 the United States Constitution, 42 U.S.C. § 1983, and Article I, §7, of the California Constitution.

24 60. As described above, Defendants violated Baltas' procedural due process rights by  
25 failing to provide fair and unbiased procedures through which he could defend against the accusation  
26 and the penalty imposed by Defendants. These violations include but are not limited to the CHRB's  
27 application of CHRB Rule 1888, and the inadequacy and wrongful application of CHRB's rules and  
28 procedures regarding conflicts of interest. In addition, CHRB Rule 1843.5, as implemented by the

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1 CHRB and its Agents, violates Baltas' rights to due process of the law as guaranteed by the  
2 Fourteenth Amendment of the United States Constitution, 42 U.S.C. § 1983, and Article I, §7, of the  
3 California Constitution.

4 61. Baltas has been adversely affected by the Defendants' failure to provide fair and  
5 unbiased procedures, including but not limited to, Defendants' unconstitutional application of CHRB  
6 Rule 1843.5, CHRB Rule 18B8, and the CHRB's hearing officer selection and conflict of interest  
7 rules/practices. Baltas will continue to be adversely affected for as long as this rules are allowed to  
8 remain in effect and continue to be enforced in the way the CHRB has chosen and as long as  
9 Defendants' Decision remains in force.

10 62. Baltas is entitled to declaratory and/or other equitable relief, including but not limited  
11 to, an injunction or other appropriate order directing Defendants to set aside any decision arising out  
12 of their application of CHRB Rule 1887(a) as an unlawful and unconstitutional adjudication in  
13 violation of the Fourteenth Amendment of the United States Constitution, 42 U.S.C. § 1983, and  
14 Article I, §7, of the California Constitution.

### 15 THIRD CAUSE OF ACTION

16 (Declaratory and Injunctive Relief – Against All Defendants)

17 63. Baltas realleges the allegations set forth in paragraphs 1 through 62 above, each of  
18 which are incorporated by reference as if fully set forth herein.

19 64. At all times mentioned herein there existed CHRB Rules 1887 and 1843.5, and the  
20 CHRB's hearing officer selection and conflict of interest rules/practices.

21 65. In pertinent part, Rule CHRB 1888 reads: "A trainer or other person charged with a  
22 violation of Rule 1887 of this division may defend, mitigate or appeal the charge if: .... He shows, by  
23 a preponderance of evidence, that he made every reasonable effort to protect the horses in his care  
24 from tampering by unauthorized persons."

25 66. A material controversy has arisen between Baltas and Defendants as to the  
26 constitutionality of Defendants' requirement that in order to use the defense to strict liability under  
27 CHRB Rule 1888, a licensee must install 24-hour surveillance in the barns of the horses he or she  
28

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1 trains. A material controversy has also arisen between Baltas and Defendants as to the  
2 constitutionality of CHRB Rule 1843.5 as applied.

3 67. Baltas alleges that he is entitled to a declaration from this Court that Defendants'  
4 application of CHRB Rules 1843.5 and 1887(a) as applied by the Defendants deprives Baltas of due  
5 process and are unconstitutional of the law as guaranteed by the Fourteenth Amendment of the  
6 United States Constitution, 42 U.S.C. § 1983, and Article I, §7, of the California Constitution.

7 68. Baltas also seeks an injunction preventing Defendants from applying the CHRB Rule  
8 1888 defense to require the use of 24-hour video surveillance in barns, preventing Defendants from  
9 enforcing CHRB Rule 1843.5, and enjoining the CHRB from illegally enforcing its rules in violation  
10 of the Fourteenth Amendment of the United States Constitution, 42 U.S.C. § 1983, and Article I, §7,  
11 of the California Constitution.

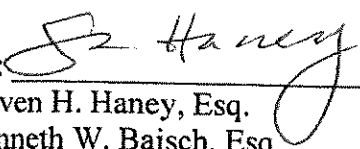
12 WHEREFORE, Baltas prays herein: that:

- 13 1. Special compensatory damages for monies already lost and for future damages in an  
14 amount commensurate with what Baltas would have earned if his reputation was not  
15 destroyed by the Defendants in an amount according to proof (an estimate to be worth  
16 what he would have earned in his career) to be proven by expert testimony at trial, in  
17 an amount believed to be in excess of \$10,000,000;
- 18 2. General damages in the form of emotional and psychological distress, pain and  
19 suffering, anxiety, stress, depression, worry, inconvenience in an amount to be proven  
20 by expert psychiatric testimony at time of trial, but in excess of \$2,000,000;
- 21 3. Punitive damages for the malicious, oppressive and/or fraudulent conduct of the  
22 CHRB, its Agents, and the other Defendants named herein, in an amount based on the  
23 wealth of the Defendants that is sufficient to deter such conduct against other licensed  
24 horse trainers in the future;
- 25 4. Cost in this action, including attorney's fees under CCP §1095, 1028.5(a) and Govt.  
26 Code § 800, et seq.;
- 27 5. Declaratory, injunctive and equitable relief as addressed above;
- 28 6. Such other relief to be granted that the Court considers proper;

1           7.     A stay on Defendants' Decision until this Court has an opportunity to rule on a  
2 Noticed Motion for Stay on the implementation of any suspension of Baltas' license.

3  
4 Dated: August 17, 2022

HANEY & SHAH, LLP

5  
6 By:   
7     Steven H. Haney, Esq.  
8     Kenneth W. Baisch, Esq.  
9     Attorneys for Plaintiff,  
10     RICHARD BALTAS

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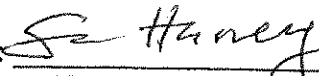
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DEMAND FOR JURY TRIAL

Plaintiff, RICHARD BALTAS, hereby demands trial by jury for this case.

Dated: August 17, 2022

HANEY & SHAH, LLP

By:   
\_\_\_\_\_  
Steven H. Haney, Esq.  
Kenneth W. Baisch, Esq.  
Attorneys for Plaintiff,  
RICHARD BALTAS

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VERIFICATION

I am the petitioner and plaintiff in this proceeding. I have read the foregoing petition and complaint and know the contents thereof. The facts alleged in the above petition and complaint are true of my knowledge except that as to those matters which are therein alleged on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct.

Dated: Aug. 17, 2022

  
Richard Baltas (Aug 17, 2022 13:25 PDT)  
RICHARD BALTAS







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Final Audit Report

2022-08-17

Created:	2022-08-17
By:	Lauren Moorehead (lmoorehead@haneyshah.com)
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-  Document created by Lauren Moorehead (lmoorehead@haneyshah.com)  
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-  Document emailed to richardbaltas@gmail.com for signature  
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-  Signer richardbaltas@gmail.com entered name at signing as Richard Baltas  
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-  Document e-signed by Richard Baltas (richardbaltas@gmail.com)  
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# EXHIBIT A



# COMPLAINT

CASE NUMBER: 22SA0092

The CHRB hereby files a complaint against **Richard Baltas** for violation of CHRB Rule **1843.5 (23 counts)**, **1887(a) (23 counts)**, and **1902 (1 count)**. The person named in this complaint holds a license as a **trainer**, license number **232550-05/2022**. The offense alleged occurred on or about **4/15/2022 to 5/8/2022** and is as follows:

**Between the dates of 4/15/2022 to 5/8/2022, 23 horses trained by RICHARD BALTAS were administered a substance on days they were entered into races. Surveillance video captured all administrations by employees of BALTAS' barn. The substance was analyzed by University of California, Davis, who reported the presence of Higenamine and Paeonol.**

Pursuant to Business and Professions Code Section 19420, 19440, and CHRB Rules, the stewards are empowered to impose penalties for violation of any provision of the CHRB Rules. Such penalties may consist of suspension of any license, fines, and exclusion from all racing enclosures under the jurisdiction of the Board or by any combination of these penalties.

Date :6/21/2022	Complainant :CHRB
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## NOTICE TO APPEAR

To **Richard Baltas** you are hereby notified to appear before the Board of Stewards at the below listed location, date, and time.

Location: <b>Los Alamitos</b>	Date: <b>7/1/2022</b>	Time: <b>10:00 a.m.</b>
-------------------------------	-----------------------	-------------------------

You are entitled to reasonable notice of the hearing and reasonable time to prepare for the hearing. If you need additional time to prepare for the hearing, you must contact the Board of Stewards within 72 hours of receipt of this notice. All requests for a continuance must be in writing. You should be prepared to justify your request for additional time. Granting or denial of a request for additional time is within the sound discretion of the stewards. The hearing will be conducted in accordance with the GOVERNING PROCEDURES FOR HEARING BEFORE THE BOARD OF STEWARDS, a copy of which is attached to this Complaint and Notice to Appear.

Investigator Michael Barker	Date June 21, 2022
--------------------------------	-----------------------

DISPOSITION OF CASE

The stewards have taken the following action on CASE NUMBER: 22SA0092

_____	_____
Steward	Date
_____	_____
Steward	Date
_____	_____
Steward	Date

**GOVERNING PROCEDURE FOR DISCIPLINARY HEARING  
BEFORE BOARD OF STEWARDS**

1. The CHRB will provide you notice and an opportunity to be heard, including the opportunity to present and rebut evidence. (Government Code § 11425.10(a)(1))
2. Every person who is called to testify before the stewards is entitled to have counsel or an observer of his choosing present at the hearing; provided, however, that such counsel or observer shall only participate under such conditions or in such manner as the stewards may direct. (4 CCR 1539)
3. The hearing shall be open to the public as provided in Government Code § 11425.20, which states:
  - (a) Nothing in this subdivision limits the authority of the presiding officer to order closure of a hearing or make other protective orders to the extent necessary or proper for any of the following purposes:
    - (1) To satisfy the United States Constitution, the California Constitution, federal or state statute, or other law, including but not limited to laws protecting privileged, confidential, or other protected information.
    - (2) To ensure a fair hearing in the circumstances of the particular case.
    - (3) To conduct the hearing, including the manner of examining witnesses, in a way that is appropriate to protect a minor witness or a witness with a developmental disability, as defined in Section 4512 of the Welfare and Institutions Code, from intimidation or other harm, taking into account the rights of all persons.
  - (b) To the extent a hearing is conducted by telephone, television, or other electronic means, subdivision (a) is satisfied if members of the public have an opportunity to do both of the following:
    - (1) At reasonable times, hear or inspect the agency's record, and inspect any transcript obtained by the agency.
    - (2) Be physically present at the place where the presiding officer is conducting the hearing.
  - (c) This section does not apply to a prehearing conference, settlement conference, or proceedings for alternative dispute resolution other than binding arbitration.
4. The presiding officer is subject to disqualification for bias, prejudice, or interest as provided in Government Code § 11425.40, which states:
  - (a) The presiding officer is subject to disqualification for bias, prejudice, or interest in the proceeding.
  - (b) It is not alone or in itself grounds for disqualification, without further evidence of bias, prejudice, or interest, that the presiding officer:
    - (1) Is or is not a member of a racial, ethnic, religious, sexual, or similar group and the proceeding involves the rights of that group.
    - (2) Has experience, technical competence, or specialized knowledge of, or has in any capacity expressed a view on, a legal, factual, or policy issue presented in the proceeding.
    - (3) Has as a lawyer or public official participated in the drafting of laws or regulations or in the effort to pass or defeat laws or regulations, the meaning, effect, or application of which is in issue in the proceeding.
  - (c) The provisions of this section governing disqualification of the presiding officer also govern disqualification of the agency head or other person or body to which the power to hear or decide in the proceeding is delegated.

- (d) An agency that conducts an adjudicative proceeding may provide by regulation for preemptory challenge of the presiding officer.
5. Ex parte communications shall be restricted as provided in Government Code §§ 11430.10 through 11430.80, which states in part:
    - (a) While the proceeding is pending there shall be no communication, direct or indirect, regarding any issue in the proceeding, to the presiding officer from an employee or representative of an agency that is a party or from an interested person outside the agency, without notice and opportunity for all parties to participate in the communication.
    - (b) Nothing in this section precludes a communication, including a communication from an employee or representative of an agency that is a party, made on the record at the hearing.
    - (c) For the purpose of this section, a proceeding is pending from the issuance of the agency's pleading, or from an application for an agency decision, whichever is earlier.  
(Government Code § 114230.10)
  6. The board, its executive director, or the stewards, may issue subpoenas for the attendance of witnesses or the production of any records, books, memoranda, documents, or other papers or things, as is necessary to enable any of them to effectually discharge their duties, and may administer oaths or affirmations as necessary in connection therewith. (Business and Professions Code § 19435)
  7. The stewards may refer any matter within their jurisdiction to the Board when the penalty the stewards have jurisdiction to impose is insufficient when a hearing cannot be held under the conditions or in the manner prescribed, when a hearing is impractical due to conclusion of the meeting, or for other good and sufficient cause, and they may order the suspension of the licensee pending further Order of the Board. In such event, the Board shall accept the matter for hearing and adjudication or such other action as the Board deems to be in the best interests of justice. (4 CCR 1529)
  8. A verbatim record shall be made of all hearings before the stewards in any matter other than those relating solely to riding infractions where the penalty imposed by the stewards is ten (10) days or less suspension, or those relating to license application recommendations. Notwithstanding the previous sentence, and at the stewards' discretion, the racing association shall provide either a certified court reporter or electronic recording equipment to record all hearings. Such recording equipment shall include, but not be limited to, tape recorder(s), at least three (3) microphones and a sufficient supply of recording tapes. The cost of such reporter and recording equipment shall be assumed by the racing association conducting the racing meeting. The taped recording(s) shall be stored and maintained by the Board for a minimum of sixty (60) days after the initial hearing or in the event an appeal is filed, a minimum of sixty (60) days after an appeal is heard and decided by the Board. Upon the request of the Executive Director or his/her designee, the racing association shall furnish an original and two copies of the hearing transcript to the Executive Director. (4 CCR 1537)
  9. The decision shall be in writing, be based on the record, and include a statement of the factual and legal basis of the decision as provided in Government Code section 11425.50. (Government Code § 11425.10(a)(6))
  10. From every decision of the stewards, except a decision concerning the disqualification of a horse due to a foul or a riding or driving infraction, an appeal may be made to the Board. Appeals shall be made in writing, stating the reason or reasons for the appeal, and shall be signed by the appellant, appellant's attorney, or appellant's representative. Appeals shall be received by a Board employee at any of its offices, not later than seventy-two (72) hours from the date of the decision of the stewards unless the Board for

good cause extends the time for filing. An appeal shall not affect a decision of the stewards until the appeal has been sustained or dismissed or a stay order issued by the Chairman. (4 CCR 1761)

11. The Board shall notify the appellant, the stewards and all licensees or other persons affected by decision under appeal of the date, time and location of its hearing in the matter. The burden shall be on the appellant to prove the facts necessary to sustain the appeal. (4 CCR 1764)
12. The Board, upon due consideration, may overrule any steward's decision other than a decision to disqualify a horse due to a foul or a riding or driving infraction in a race, if a preponderance of the evidence indicates any of the following:
  - (1) The steward mistakenly interpreted the law.
  - (2) New evidence of a convincing nature is produced.
  - (3) The best interests of racing and the state may be better served.

However, any decision pertaining to the finish of a race, as used for purposes of parimutuel fund distribution to winning ticketholders, may not be overruled. Furthermore, any decision pertaining to the distribution of purses may be changed only if a claim is made in writing to the board by one of the involved owners or trainers, and a preponderance of the evidence clearly indicates to the board that one or more of the grounds for protest, as outlined in regulations adopted by the board, has been substantiated. The chairperson of the board may issue a stay of execution pending appeal from a steward's decision if the facts justify the action. (Business and Professions Code § 19517)

13. The Board shall issue its decision upon any appeal in writing and such decision is subject to review by the court having jurisdiction. (4 CCR 1763)
14. Chapter 5 of Part 1 of Division 3 of Title 2 of the Government Code is not applicable to this proceeding.

§ 1843.5. Medication, Drugs and Other Substances Permitted After Entry in a Race.

(a) In this article a horse is deemed "entered" in a race 48 hours before post time of the running of the race.

(b) Water, hay, and grain may be provided to the horse up until post time.

(c) Drugs, medications or any other substances shall not be administered by any means to a horse after it is deemed enter to race except:

(1) Topical medications, (such as antiseptics, ointments, salves, leg rubs, leg paints, hoof dressings, liniments and antiphlogistics) which do not contain anesthetics or other prohibited drugs.

(d) Any drug, medication or any other substance found in a test sample taken from a horse which is not authorized under this rule shall be deemed a prohibited drug substance.

(e) Any of the following substances may be administered by injection until 24 hours before the post time of the race in which the horse is entered:

(1) Injectable Vitamins;

(2) Tetanus Antitoxin or Tetanus Toxoid, if the horse has sustained a wound.

(f) Approved anti-ulcer medications may be administered until 24 hours before the post time of the race in which the horse is entered. A list of approved anti-ulcer medications, and route of administration, shall be posted at each racetrack in the office of the official veterinarian.

(g) In addition to the substances named in subsection (c)(1), any of the following substances may be administered under Rule 1845 of this division within 24 hours of the post time of the race in which the horse is entered:

(1) Furosemide;

(2) Only water may be used to wash the horse's mouth on race day.

(h) Drugs, medications or any other substances may not be administered to a horse by injection, via nasogastric tube (stomach tubing) or any other means after the horse is entered to race, except under these regulations.

**§ 1887. Trainer or Owner to Insure Condition of Horse.**

(a) The trainer is the absolute insurer of and responsible for the condition of the horses entered in a race, regardless of the acts of third parties, except as otherwise provided in this article. If the chemical or other analysis of urine or blood test samples or other tests, prove positive showing the presence of any prohibited drug substance defined in Rule 1843.1 of this division, the trainer of the horse may be fined, his/her license suspended or revoked, or be ruled off. In addition, the owner of the horse, foreman in charge of the horse, groom, and any other person shown to have had the care or attendance of the horse, may be fined, his/her license suspended, revoked, or be ruled off. The owner of a ship-in horse is the joint-absolute insurer of and is equally responsible for the condition of the horse entered in a race.

**§ 1902. Conduct Detrimental to Horse Racing.** No licensee shall engage in any conduct prohibited by this division nor shall any licensee engage in any conduct which by its nature is detrimental to the best interests of horse racing including, but not limited to:

(a) knowing association with any known bookmaker, known tout, or known felon,

(b) indictment or arrest for a crime involving moral turpitude or which is punishable by imprisonment in the state or federal prison, when such indictment or arrest is the subject of notorious or widespread publicity in the news media, and when there is probable cause to believe the licensee committed the offenses charged,

(c) solicitation of or aiding and abetting any other person to participate in any act or conduct prohibited by this Division





CASE NUMBER  
 22SA0092

CASE TITLE

DATE 6/21/2022	INVESTIGATOR Mike Barker
TRACK / LOCATION Santa Anita	OTHER INVESTIGATORS Jeanne-Candice Garrido
REPORT RE Baltas unauthorized substance on race day	

Details:

On 5/8/2022 the Assistant Trainer for RICHARD BALTAS, MARTIN VALENZUELA, was seen by Santa Anita Surveillance Security Agent CORY MARTINEZ administering an unknown substance to horse "NOBLE REFLECTION" prior to the horse receiving Lasix administration. MARTINEZ notified the Santa Anita Stewards, who in turn notified Safety Steward GEORGE YNIGUEZ and Investigator JEANNE-CANDICE GARRIDO. GARRIDO and YNIGUEZ contacted VALENZUELA who initially said he did not administer anything to the horse. When told of the surveillance video VALENZUELA admitted to GARRIDO he gave the substance, which he identified as X-Treme Air Boost, to "NOBLE REFLECTION" to prevent it from bleeding on race day. VALENZUELA said he was supposed to give the treatment days before the race and "forgot," so he gave it to the horse on race day. VALENZUEZ did admit to GARRIDO he knew this was a violation. GARRIDO also spoke to BALTAS that day who also told her VALENZUELA forgot to administer the substance days before the race and made a mistake and administered it on race day.

The substance in question, the X-Treme Air Boost, was located discarded in BALTAS' barn by GARRIDO and YNIGUEZ and seized. It was then sent to Maddy Laboratory at UC Davis for analyzing. Refer to GARRIDO's attached report for complete details.

I took over the investigation from GARRIDO on 5/9/2022. On 5/10/2022 I was notified that available video had been reviewed by MARTINEZ that showed 23 of BALTAS' horses receiving the X-Treme Air Boost, and occasionally another substance later identified as Calm and Clear, between the dates of 4/15/2022 to 5/8/2022. All of the 23 horses received the X-Treme Air Boost on days they raced. The only horse that did not race was "NOBLE REFLECTION," which had been scratched by Santa Anita Stewards on 5/8/2022.

On 5/11/2022 I contacted MARTINEZ who showed me the video of "NOBLE REFLECTION" being administered the substance, as well as the other videos. When I reviewed the videos with MARTINEZ I saw the X-Treme Air Boost being administered to the horses mostly by VALENZUELA, but occasionally by other employees in BALTAS' barn. Also on 5/11/2022, I contacted the veterinarian for BALTAS' barn, Dr. MELINDA BLUE, and asked her about the X-Treme Air Boost being given to BALTAS' horses. Dr. BLUE told me she had not been aware of the horses being

INVESTIGATOR'S NAME Mike Barker		APPROVED BY (SUPERVISING INVESTIGATOR'S NAME) Mike Barker	
INVESTIGATOR'S SIGNATURE 	DATE 6-22-22	APPROVAL SIGNATURE 	DATE 6-22-22



STATE OF CALIFORNIA - CALIFORNIA HORSE RACING BOARD  
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FILE TITLE

administered the substance and did not know what the substance was. Dr. BLUE said she only became aware of it when BALTAS mentioned it to her this week.

On 5/12/2022 all videos were formally requested and received by Santa Anita. I also received a list from MARTINEZ that showed all 23 horses that received treatment on race day. The list included the date of administration, the name of the horse, which race it was in, the time of treatment, and the placing in race.

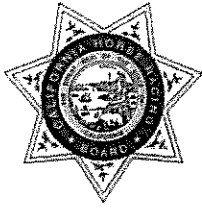
That same day I interviewed VALENZUELA at BALTAS' barn. That interview was recorded with VALENZUELA's knowledge and permission. The following is a summary of that interview. I asked VALENZUELA to tell me about the X-Treme Air Boost. VALENZUELA said he made a mistake this past week and "accidentally" administered the substance on Sunday, which was 5/8/2022, but was supposed to administer it on Saturday. VALENZUELA said he got busy Saturday and forgot. VALENZUELA said on Sunday he noticed the tube of X-Treme Air Boost with "NOBLE REFLECTION" written on it and "blocked out" and administered it.

I asked VALENZUELA if BALTAS was aware of the X-Treme Air Boost was being given and VALENZUELA replied that BALTAS had told him to give it at 48 hours and 24 hours, but not the day of the race. VALENZUELA said he should have told BALTAS he forgot to give the substance but had a "mental block" and "panicked." VALENZUELA said it was completely his error. I asked VALENZUELA who administers the substance and he said he is the one who stores it and administers it.

I asked VALENZUELA what BALTAS' standing orders are with the X-Treme Air Boost. VALENZUELA said BALTAS will tell him what horses are bleeders need the substance. VALENZUELA said he already knows what horses need it and that there is not really a discussion. I asked VALENZUELA that if the horses were given X-Treme Air Boost on race day if that would be a mistake and he said it would be. VALENZUELA said the normal protocol is to give the X-Treme Air boost 24 hours prior to racing. I asked VALENZUELA if BALTAS would be notified if the substance was given on race day and he said no. I asked VALENZUELA if BALTAS was aware of all the horses that received the substance and he said no.

I contacted BALTAS later in the day and tried to interview him. BALTAS referred me to his attorney, DARRELL VIENNA. I then contacted VIENNA and an interview with he and BALTAS was arranged on 5/14/2022 via Microsoft Teams.

On 5/14/2022 an interview was conducted and recorded on Microsoft Teams with the knowledge and permission of VIENNA. Prior to that interview beginning, VIENNA told me he was going to advise and limit BALTAS' answers and keep them strictly to information about the X-Treme Air Boost. I started out by asking BALTAS to tell me what he knew about the substance. BALTAS said the X-Treme Air Boost is a herbal supplement that he found out about in the Santa Anita Condition Book. BALTAS said he ordered it for bleeder horses. VIENNA then told me the ingredients listed by the manufacturer. I asked BALTAS about the purchasing of the X-Treme Air Boost. BALTAS said he ordered it through the Tack Shop and had it delivered to his barn at Santa Anita. For information, this interview was extremely limited, but VIENNA did advise me he would they would be open for a more detailed second interview once he had conversations with CHRB Administration about the situation.



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On 5/28/2022 that second interview took place on Microsoft Teams with BALTAS and VIENNA. It was again recorded with the knowledge and permission of VIENNA. The following is a summary of that interview.

VIENNA began the interview by saying there were two substances that were at issue, the X-Treme Air Boost and Calm and Cool, with the X-Treme Air boost being administered substantially more. I asked BALTAS first about the X-Treme Air Boost and when and how much was supposed to be administered by his employees. BALTAS said one tube was supposed to be administered four hours out from racing. I asked BALTAS if he was aware that was a rule violation and he said he now is. I asked BALTAS if the administration was based on his orders. BALTAS responded by saying "I got sloppy and had too many horses." BALTAS later added that he only used that substance on horses that bled, that he was trying to help them, and they made a mistake.

I asked BALTAS how he came across the substance. BALTAS said he likes to use herbal supplements on his horses and he believes in them because they are natural. BALTAS said he came across the X-Treme Air Boost in the condition book and spoke to the Tack Shop in New York and was told the substance was not harmful or performance enhancing and was just herbal supplements.

I asked BALTAS about the 24 hour rule, and he said he was not aware it was exactly 24 hours and thought it was just the day of the race itself. I asked BALTAS if he thought giving the substance on race day was a violation and he said he did not and mentioned it being a natural substance. BALTAS said he now knows he violated the rule. I then asked about the Calm and Cool and it being administered. BALTAS said that is just used to calm some of the horses down. I asked BALTAS how long he has been using these substances and he said months. I asked prior to February of this year, and he said he did not believe that long. BALTAS later added that Cool and Calm may have been used longer than that. For information, during the interview BALTAS did say he got caught and he violated the rules and was willing to pay the consequences.

On 6/16/2022 I received the results on the used vial of X-Treme Air Boost that Investigator GARRIDO sent to be analyzed by the Maddy Lab. The final report listed two substances found in X-Treme Air Boost. Those substances are Higenamine and Paeonol. Of all the horses seen on video being administered the X-Treme Air Boost, eight horses still have blood or urine available to be tested. Further testing is pending.

In the current case BALTAS is in violation of 23 counts of CHRB rule 1843.5 – substances may not be entered into a horse once the horse has been entered into a race, 23 counts of CHRB rule 1887(a) – trainer to insure condition of the horse, and one count of CHRB rule 1902 – conduct detrimental to horse racing.

End of report.

DATE	NAME OF HORSE
Sunday, May 8, 2022	BRIX
	NOBLE REFLECTION
Saturday, May 7, 2022	SAI CON
	CRYPTO MUNNY
	STERLING CREST
	LUCKY GIRL
	ADELIE
	CARROLL GIRL
	SPEEDCUBER
	GEM MINE
Friday, May 6, 2022	GRANOLA GIRL
	VIA EGNATIA
Sunday, May 1, 2022	TMORROWISLONGTIME
	MENDHAM HILL
Saturday, April 30, 2022	GALLOVIE
	PARCO
	MASTEROFFOXHOUNDS
	MORAWETH
Sunday, April 17, 2022	BALLADEER
	THE GINGER QUEEN
	THRUMPS DREAM
Saturday, April 16, 2022	HENLEY'S JOY
Friday, April 15, 2022	BICAMERAL

RACE #	TIME OF TREATMENT	PLACING IN RACE
4	11:01 AM	7th
10		SCRATCHED
1	8:55 AM	2nd
1	8:53 AM	5th
5	10:05 AM	2nd
5	10:04 AM	5th
7	12:18 PM	5th
7	1:03 PM	3rd
7	12:35 PM	11th
9	1:43 PM	3rd
1	9:27 AM	3rd
3	10:29 AM	2nd
5	11:09 AM	2nd
7	12:20 PM	8th
3	9:54 AM	1st
8	12:59 PM	5th
11	3:38 PM	2nd
12	3:14 PM	9th
4	10:47 AM	3rd
5	11:54 AM	8th
7	12:02 PM	1st
9	2:10 PM	3rd
1	10:51 AM	1st



CALIFORNIA ANIMAL HEALTH & FOOD SAFETY  
LABORATORY SYSTEM  
P.O. BOX 1770  
DAVIS, CALIFORNIA 95617

PHONE: (530) 752-8700  
FAX: (530) 752-6253

June 15, 2022

J. Garrido, Investigator  
Santa Anita Park - CHRB  
285 W. Huntington Drive  
Arcadia, CA 91066

Case Number: 22SA0092  
Date Collected: 05/08/22  
Date Received: 05/10/22  
Tracking Number: 8107 8662 9209

### FINAL REPORT

The contents of the submitted sample(s) detailed below were analyzed for the presence of prohibited substances. A portion of the contents was analyzed by Gas Chromatography - Mass Spectrometry (GC-MS) and Liquid Chromatography - Mass Spectrometry (LC-MS).

#### Summary of analytical testing results:

- Exhibit EV0740 Item 1 – Description – 1 - Syringe of X-Treme Air Boost (Used).
  - Testing Results: Higenamine and Paeonol were detected.

The submitted evidence will remain in storage at the Kenneth L. Maddy Equine Analytical Chemistry Laboratory pending disposal.

Sincerely,

A handwritten signature in black ink, appearing to read "B Moeller", with a horizontal line underneath.

Benjamin Moeller, Ph.D., D.A.B.T.  
Assistant Professor  
K.L. Maddy Equine Analytical Chemistry Laboratory



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DATE 5/12/2022	INVESTIGATOR Jeanne Garrido
TRACK / LOCATION Santa Anita Park	OTHER INVESTIGATORS
REPORT RE Trainer Richard Baltas – “NOBLE REFLECTION” unauthorized medication/treatment on race day	

On 5/8/2022, I was notified by Safety Steward George Yniguez that security footage captured the horse “NOBLE REFLECTION” receive an unknown substance from a stable worker prior to racing. The horse was scheduled to run in the 10<sup>th</sup> race at Santa Anita Park on 5/8/2022. The trainer on record is Trainer Richard Baltas (#232550 - 05/2022).

Safety Steward Yniguez and I went to the surveillance room to view the footage from Baltas’ barn. The footage showed an adult male walk up to stall #60 where “NOBLE REFLECTION” stood. The male took a syringe out of the front pocket of his sweatshirt and proceeded to dispense the contents into the horse’s mouth. He placed the syringe back into his pocket and walked away from the stall. The male then walked back to the stall with two of the Lasix Team technicians. Safety Steward Yniguez stated he recognized the male in the footage to be Martin Valenzuela (#300419 – 2/28/2025), the assistant trainer for Richard Baltas.

I accompanied Yniguez to the Receiving Barn, where he requested a veterinarian technician to draw a blood sample from the horse. Veterinarian Technician Katie Sullivan, Yniguez, and I arrived at Richard Balta’s stable (Barn #116) at approximately 2:00 p.m. I was met by two Santa Anita Park security guards who advised they had seen Valenzuela leave the barn area as they were arriving. I called Valenzuela via telephone and asked him to come back to the barn. While waiting for Valenzuela, both Yniguez and I searched the area near the stall for any evidence. Inside an empty feed bag tied to the side of the horse’s stall I located a used syringe of X-Treme Air Boost Paste by Winners Equine Products with the name “NOBLE REFLECTION” written on it in black marker. I took the syringe as evidence, which I later sent it out to be tested (See attached paperwork).

Valenzuela arrived at the barn shortly after, and initially told me he did not administer anything to the horse. After I told him we have surveillance footage he then admitted to giving the horse a treatment. He told me the treatment contained the Chinese herb Yunnan Baiyao and was used to help the horse because it “bleeds.” He told me the treatment is supposed to help prevent the horse from bleeding on race day and is not a performance enhancer. He confirmed the treatment was a syringe of X-Treme Air Boost Paste, and that he discarded it in the feed bag next to the stall.

INVESTIGATOR'S NAME Jeanne Garrido		APPROVED BY (SUPERVISING INVESTIGATOR'S NAME) Mike Barker	
INVESTIGATOR'S SIGNATURE 	DATE 5/14/22	APPROVAL SIGNATURE 	DATE 5/17/22



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Valenzuela said "NOBLE REFLECTION" is usually given the treatment at 48 hours and 24 hours prior to racing. He had forgotten to give the horse the treatment at the 24-hour mark. Valenzuela confirmed he is aware of race day rules in regard to medication and treatments, but still gave a treatment to the horse because "the horse needed it". Valenzuela said he was not instructed to administer the treatment on race day. Valenzuela advised the product is advertised in the Santa Anita Park Condition book, and the barn purchases it for their horses along with other products from the manufacturer's website ([www.winnersequine.com](http://www.winnersequine.com)). When asked why he didn't inform the Lasix Team he just administered a treatment when they arrived at his barn, he replied "I just forgot."

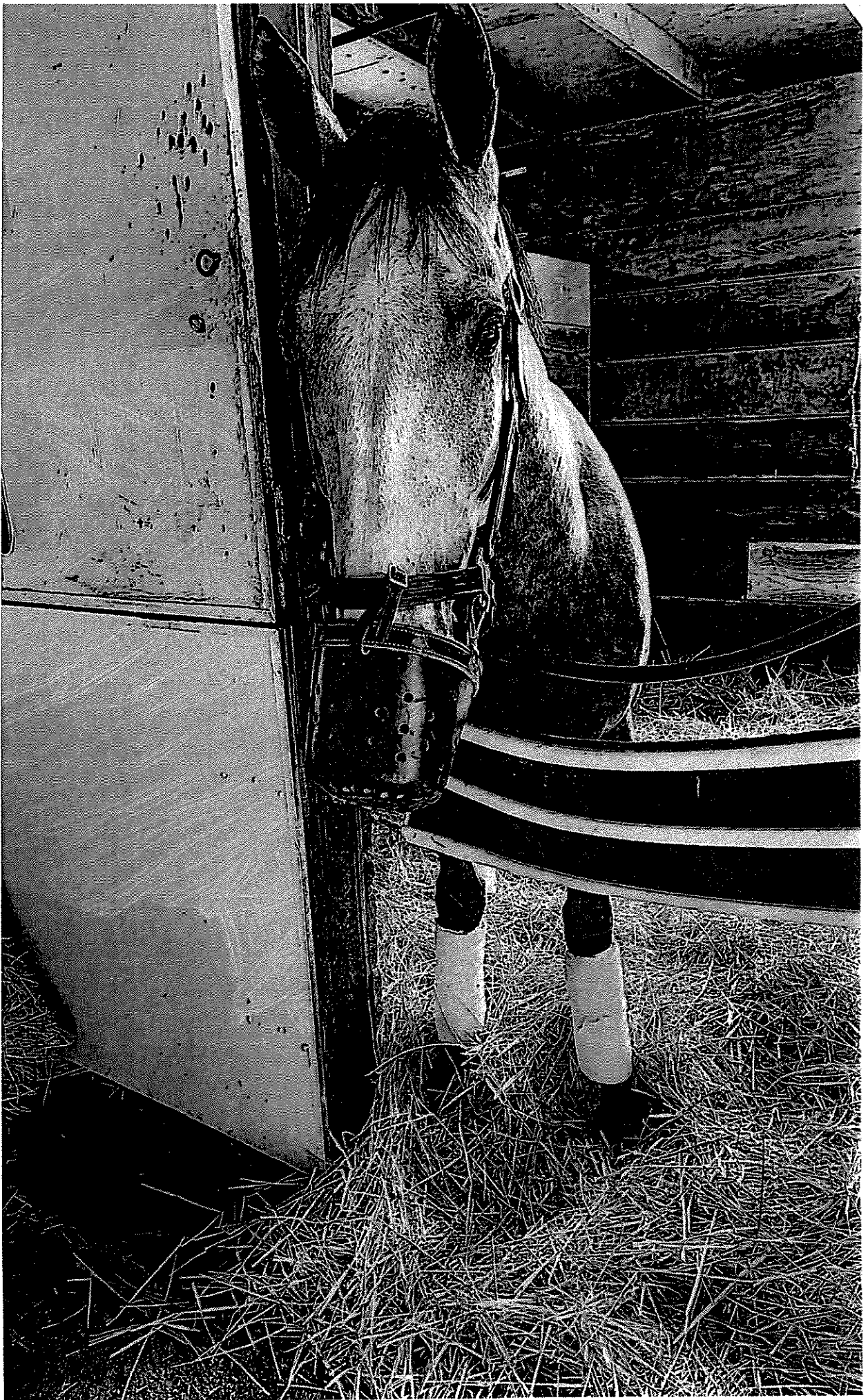
Valenzuela told me he stores the X-Treme Air Boost Paste in their tack room. When Safety Steward Yniguez and I searched the tack room, we only located one other syringe of the X-Treme Air Boost Paste. Valenzuela also showed us other supplements at the barn which also contain the herb Yunnan Baiyao (see attached photos). I took photos of the barn's medication treatment logs (See attached photos). Valenzuela provided no further information.

I spoke to Trainer Richard Baltas via telephone. Baltas told me Valenzuela "screwed up and made a big mistake" and that he did not instruct Valenzuela to give anything to "NOBLE REFLECTION" on race day. Baltas said the X-Treme Air Boost Paste is a product they administer to their horses 3-4 days before race day, but not on the actual day of racing. He advised the substance is all natural and is advertised in the condition book. Baltas had no further information to provide.

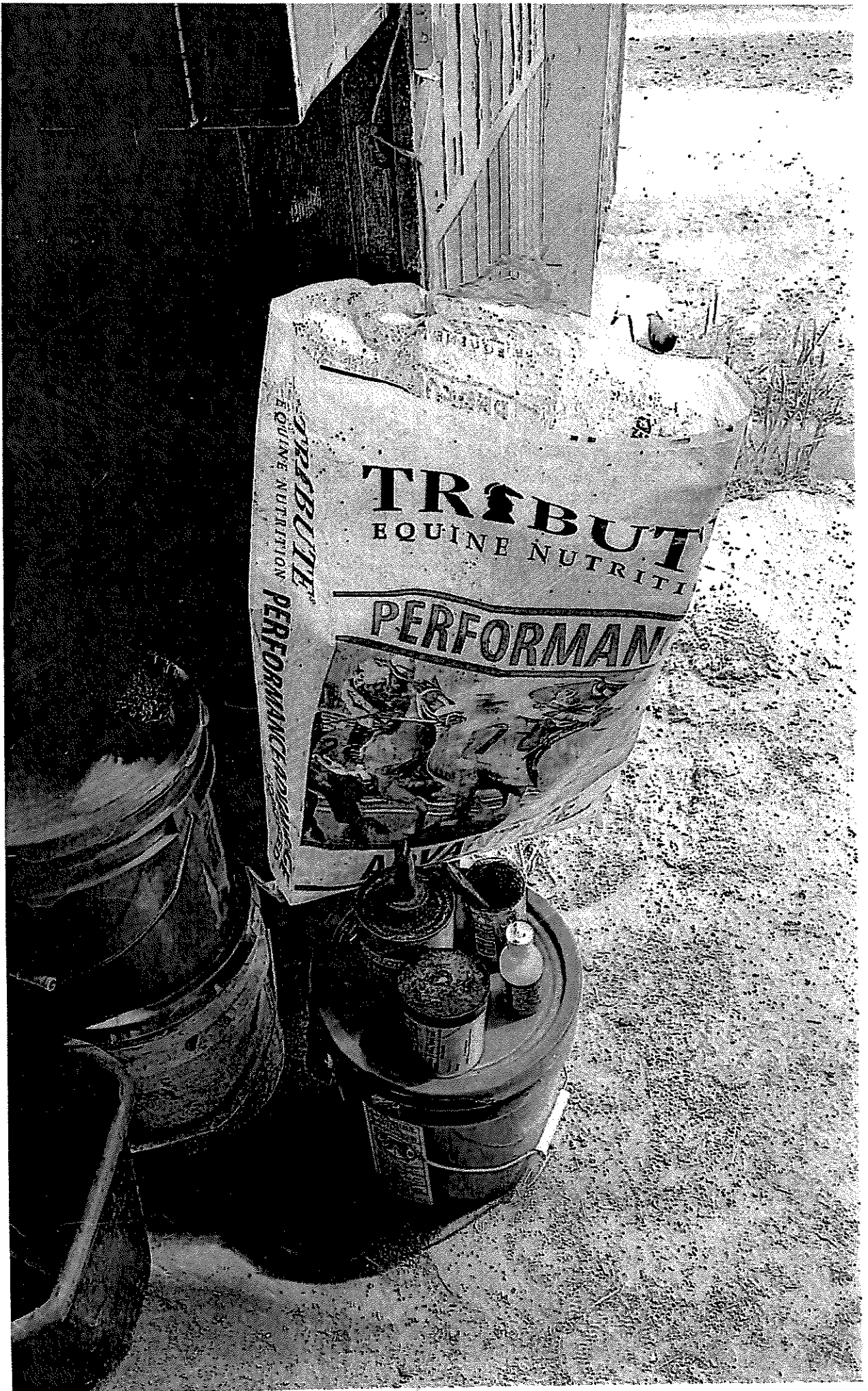
I sealed the used syringe of X-Treme Air Boost Paste into an evidence bag (#EVO740) and completed the CHRB Receipt for Property (CHRB-207), and CHRB Report of Equine Drug Evidence Collected (CHRB-207) forms. On 5/8/2022, I submitted the evidence and forms to Evidence Custodian Sergio Chavez at the Receiving Barn to send to the Kenneth L. Maddy Laboratory at UC Davis for analysis.

End of report.







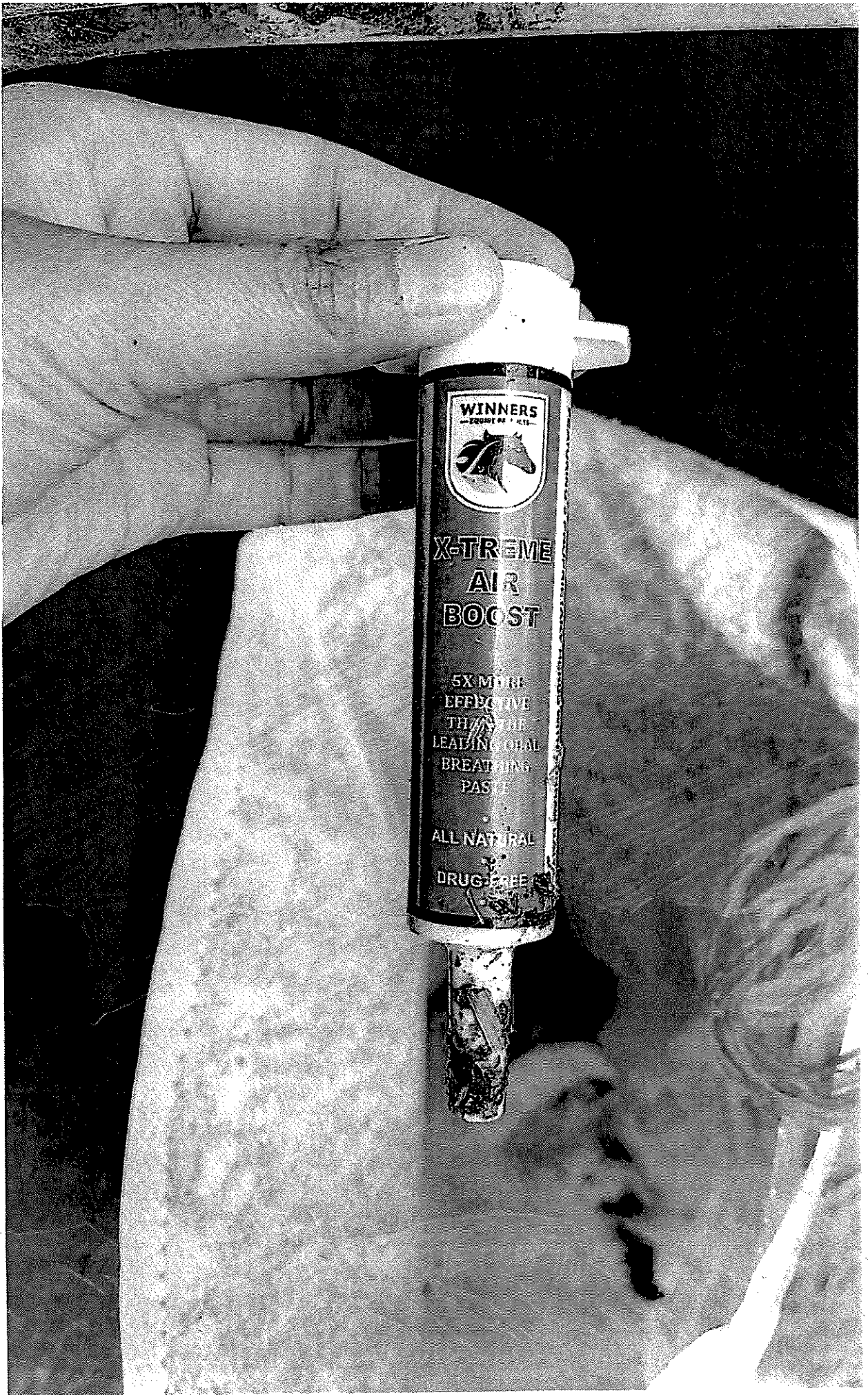


TREBUT<sup>®</sup>  
EQUINE NUTRITION  
PERFORMANCE

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EQUINE NUTRITION  
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WINNERS

EQUINE HEALTH CARE



X-TREME  
AIR  
BOOST

5X MORE  
EFFECTIVE  
THAN THE  
LEAVING ORAL  
BREATHING  
PASTE

ALL NATURAL

DRUG-FREE



**FORMULATED TO MAXIMIZE YOUR HORSES ABILITY TO WIN**  
Directions: For best results give one tube 4-6 hours pre-event. For extreme cases, give one tube the night before and one tube 4-6 hours pre-event.

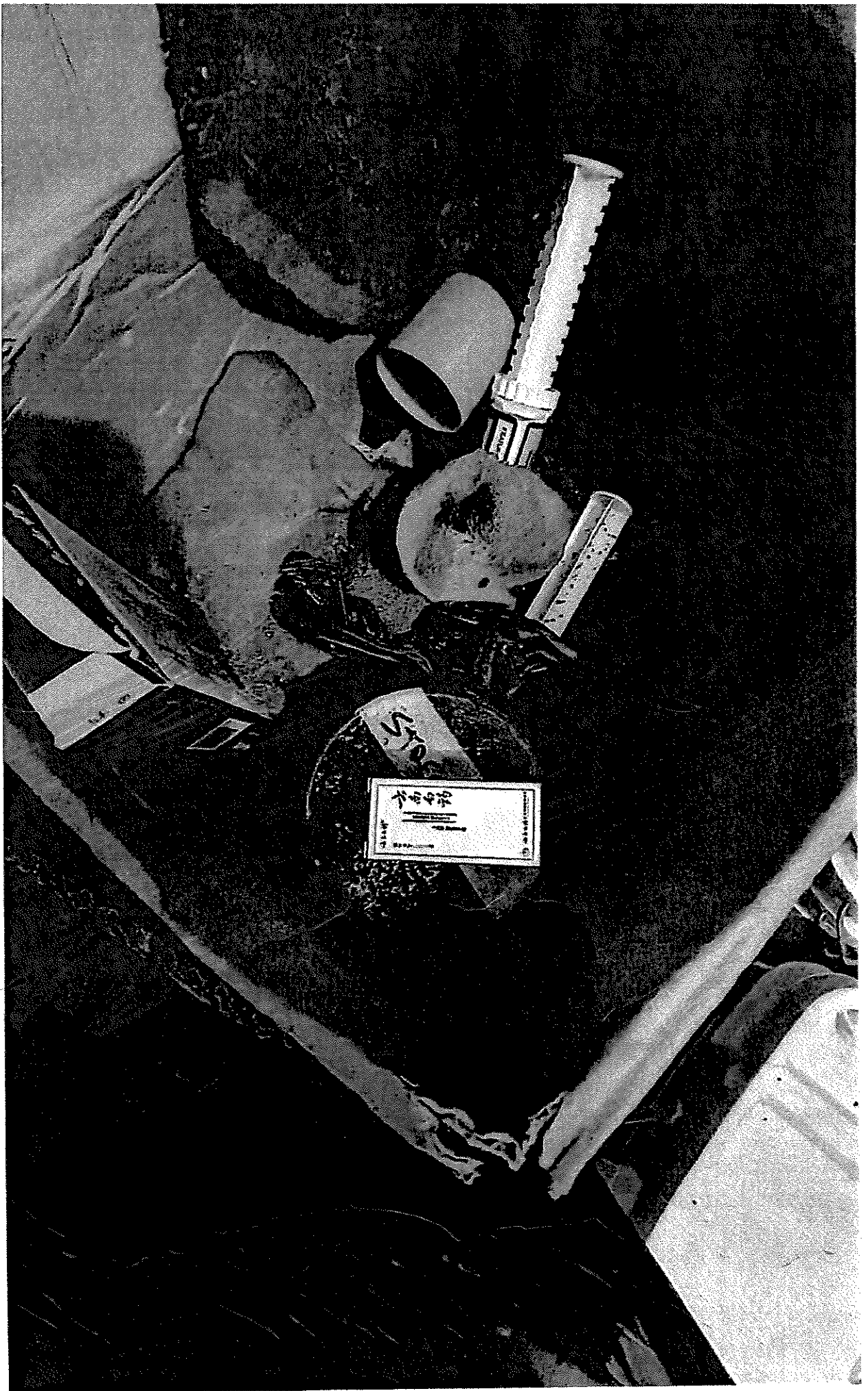
**Product Facts**

Active ingredients  
Cremor ..... 1.000 mg  
Yeast/Biotin ..... 1.000 mg

Inactive ingredients  
Vegetable cellulose, stearic acid  
Caution: Do not use on pregnant mares.





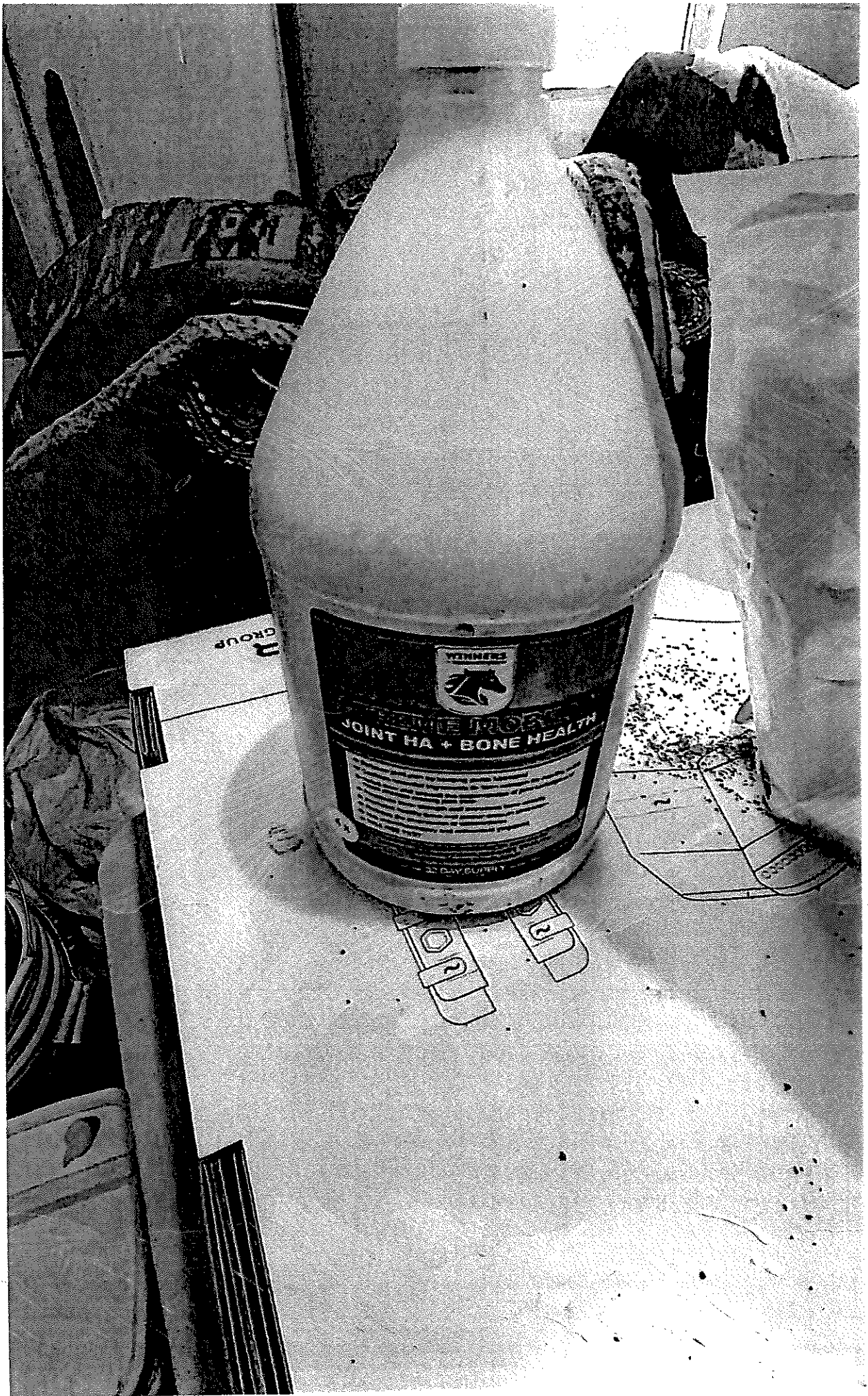


DIDN'T GIVE ME YESTERDAY FORG  
NURSE NED'S 22

ALL NATURAL  
DRUG-FREE  
NANNI NANNI SE

**云南白药**  
• Yunnan Baiyao •  
— 救急 止血 止痛 —  
图投设计 253020788

云南白药  
云南白药 昆明盘龙药业公司  
YUNNAN BAIYAO PHARMACEUTICAL CO., LTD.  
KUNMING YUNNAN CHINA



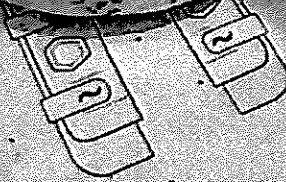
GROUP

WINNERS



BONE MORE  
JOINT HA + BONE HEALTH

30 DAY SUPPLY



Last \* Roadie Casseway \* NET WORK \* 3cc O

Stops  
X Clu

PAHL BOEER

5cc

X

CONDELLUS DAVIS 3cc

X

X Clu

TOORDESEL 3cc

X

X Clu

HENRIK'S DAT 3cc

X

X Clu

KEARNEY 3cc

X

X Clu

LONGSTON 3cc

X

X Clu

REDELLA TOURIST 3cc

X

X Clu

FRANCOIS 3cc

X

X Clu

NETWORK

X

X Clu

SHIVERS AND - good

probabans

X

ROBUS - left wing of net work

REDELLA - 3L Full 18m 6 6

STERLING QUEST - looks good

SHAWD -

MISS COYS RICE - good

VAZZ

SALING CURE - good

FLAVIUS - R. Kue wan

SHAKER SHOOT - slum de - Hellwulhis Tehal O. V. O. W.

LOAMN AT SUEZIE

SPANISH REGIMENT - Tehal Die

MECKINBERG - Need to stop

ROADIE CASSEWAY - good

KARIN VILVAN - R. T. W. W. M. F. R. S. 2 N. D. H. V. X. W. Y. Z.

LEES BAW Zee

EEK

WAG UNCLE - Jogs sand.

RSCC - Jogs sand

Y6 JOY - good

MAKI - good

In To Vrats - good. EA, LARG

DUED - EA, LARG  Jogs sand

ADDER - Jogs sand

WOLA GIRL - Jogs good

ADUS - good mid-afternoon RK

MAHLF 197 G - OK

Panish Destiny - RH Cellulite TET Dex

SUEE Causeway - \*Bare SUE\*

Race Scrapes:

Saicon - clean

Cryptomunny - 1/2 blood

Lucky Girl - Clean

Stirling Post - Clean

Carroll Girl - Clean

Speed Cuber - RF both ses fr -> SX Monday

Adelle - Clean

Gummin - Small ulcer - tetra/dex for hindcuts

24 HR 2 L VIT + F.P

NOBLE REFLECTION  +BTC

BRIX



125th day - 240 days follow

Day of Prayer  
of Puebla Day (Mexico)

THURSDAY 5 MAY

DR CARTEL 5CC   Clean  
F MAKEWA 5CC

ECK

Y'S KITTEN - good

S COSTA RICA - Jogs OK minor Hip Drop LH. EPM

RE REFLECTION - good

WISH DESTINY -

ALTEVIALA - Jogs sand LF splint reactive to palpation

WU/2 - Jogs sand RF fetlock mlt Effusion.

WIOS - IRAP RF knee

Derm. cloth

Wish Destiny - Power Pack

	5/2	1224 Tubes
(SA)	5/5	72 Tubes
\$	40,500	1296 Tubes

Legend

Bute / ROBX / ADQ

24hr 2L VIT + EP

Con

King Crest  + DMSO

October

He

Ho Monny SLR

My Girl SLR

Old Girl SLR

1 Mine SLR

Grandia Girl

Via Egnatia  + B/L

240/2000

MAY

4

WEDNESDAY

2022 12:00 PM - 2:00 PM

X

4/1/22

BY KITTEN 5cc IX

CHECK

ELIS - jogs sound. Feet warm (Pack feet)

LIT OF MAKEUP - good

21 FOR CAMEL - good mild @ Dex Packet IX

Bute / ROBX / AOD

Granola Girl IX

Via Egnatia SLR



222 123rd day - 242 days follow

osselets

TUESDAY

3

M.

I

Wing Crest - OK sound skinner

Kim at Sweetie XR RANCE

WVS - Jogs sound.

WY CONSWAY - Jogs sound

AWASAKI - Jogs sound.

AREA GIRL - knee curled out

EXCORBER - Powerpaw

ADIAN MILLS - Being tested for Epm.

WYS JAY - Jogs sound. LF Fetlock mild EFF

WYSSAL - RF Fetlock much better.

WLEY'S KITTEN - Jogs sound. Thin.

WY.

WYHTI UP G - Do Hocks TMT/ET

WYFLECTION - EQ  Jogs sound 2 NGT

MAY 2 MONDAY

2022 122nd day - 243 days follow  
(Eid) al Fitr begins at sundown

LASIX

SCORE

STERLING CREST ECC/ROB

LOOKING AT SWEETIE ECC

VET CHECK

COMPILING UNDER - Left br warm.

TOURQUE SOL - R ankle warm -

HENKEYS JOY - Feet warm long\* needs to be shod

KAWA TAILI - L knee warm. Bute paste

GRANOLA GIRL - L knee warm - Bute -

SPEED WHEEL - ankles mild effusion. needs to be shod be

GOING TO VEGAS good

FRANCOIS good

Looking at Sweetie - db Rt front Bute Paste

Straight up 6 - LH curb - / ice potulice Bute/le

Medham Mills - Rt hind dropped - 2/5 db E  
at penis?

Master of foxhounds - WRAP - 2 Ankles.  
Vanzog WRAP 2 Ankles

Box Gastroguard (62)	<input checked="" type="checkbox"/>	4/21	11527
(SLR)		4/20	72
\$38,250			1224

2022 121st day - 244 days follow

May Day  
Labor Day (Mexico)

SUNDAY

1

MAY

SIX

SPPELLING UNCLE	3cc	<input checked="" type="checkbox"/>	
BURNESOL	5cc	<input checked="" type="checkbox"/>	
NEWAYS JY	3cc	<input checked="" type="checkbox"/>	
KAWAZAKI	3cc	<input checked="" type="checkbox"/>	
GRANDOLA GIRL	3cc	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Clean
SPEEDCUBER	5cc/ROB	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Clean
COMB TO VEGAS	5cc/ROB	<input checked="" type="checkbox"/>	
FRANCO	3cc	<input checked="" type="checkbox"/>	

VII

SPRINGERS RUN - good - gaining weight

PEPORA TORMENTA - body/back tight, jogging sound

PARCO - good, no problems

MASTER OF FOXHOUNDS - great

① STERLING CREST - good - head  give ix closer to nose

② LOOKIN AT SWEATIE - good for her, small filling in    
 → tail

MISS COSTA RICA - great - sounds

Noble Reflection system

KARNEVALDO - 1 lat sprint - paint, use buterwort - No

Base Scapes

TIMONAWA LONG TIME - clean

MEADHAM MILLS - 1/5 blood, tied up behind mill

APRIL

30

SATURDAY

2022 120th day - 245 d

LASIX

3/11

BNADER

5cc

SHUGGLES QUN

3cc

PERQUENA TORRENTA

5cc

CANDI FOR CAMEL - Good

SALCON - good

WOBLE REFLECTION - Great!

KAWMAKI - Jogs sound. LF knee mild Effusion. But

TOURNESOL - Jogs sound. Keep working on fetlocks

FRALUD - good  EQ, Larg

COMPULSIVE WALK - GOOD SKINNY

SPEEDCUBER - Jogs sound

ROCKIES CAUSEWAY - good

FLAVIUS - GOOD R KNEE BETTER

Rockie Causeway Good

GALATO VENAS - GREAT

① 10lb Platinum Balance

Face Supe

Gallone - Clean

parco - Clean

Master for - Clean

miraweth - Clean

24hr: 2lit vits + EP

Immunisalomytime

Mandham milk Bl

SCORES

DI FOR CARMEL	5CC	<input checked="" type="checkbox"/>
CON	5CC	<input checked="" type="checkbox"/>
DE REFLECTION	10cc / ROB AA / TA	<input checked="" type="checkbox"/>

Clean  
 1/5 Blood

LI - good  
 RTOF MAXENA - good, needs to be re-patch  
 EVA TORRENTA - great  
 ADER - great  
 WILERS RAN - good

AL VIT. EP

D	<input checked="" type="checkbox"/> +C
Wolfoxhans	<input checked="" type="checkbox"/>
Vie	<input checked="" type="checkbox"/> +B
Weth	<input checked="" type="checkbox"/>

48hr But / Rob / ADQ

Timoraisalonytime - SLR  
 Mendham Mill SLR  
~~Shes Devoted~~ scratched

APRIL 28 THURSDAY

2022 118th day - 247 days follow  
Holocaust Remembrance Day

Lasix

Scope

Addie

5cc / Glyco

Clean

Spirit of Melanna 5cc

FINNLEYS KITTEN - good skin damage done

PARCO - good

AUDY/FOR CARMEL - good

KEVIN JOY - good

HOOTERS SHOOT - Much Better, keep pony. Uroz Med shampoo

LOOKING AT SWEETIE - good

FOIL TO VEGAS - good / 10 Gallon Omeprazole Sosp

SIA CAR - good

VANZZY GG Sat. Joys sound. good

STELLA CRIST - thin but sound.

STRAIGHT UP G - BETTEL

FLAVIUS - 2/5 OFF RE (RE-EDDY R LINE)  DLCB - TRAP RE-EDDY

KARTAVILAW - OK

NOBLE REFLECTION / EPSTEIN LARGUE

8hr Bute / ROBY / ADA /

Parco

Masteroffhands

Vanzy (GLF)  + ALVIT

Gallavie SLR

Moraweth SLR

Sassyserb SLR (GLF)

~~THURSDAY 5-5-99~~

MED ALL

DAINT NONE

TOU LOOK AT SWEETIE, SPIRIT OF MAKINA

ROBX NONE

~~FRIDAY 5-6-99~~

MED ALL (EXCEPT ROWNERS)

DAINT NONE

TOU LOOK AT SWEETIE, SPIRIT OF MAKINA

ROBX NONE

~~SATURDAY 5-7-99~~

MED ALL (EXCEPT ROWNERS)

DAINT NONE

ROBX NONE  
TOU LOOK AT SWEETIE, SPIRIT OF MAKINA

~~SUNDAY 5-8-99~~

MED ALL (EXCEPT ROWNERS)

DAINT NONE

TOU LOOK AT SWEETIE, SPIRIT OF MAKINA

ROBX

~~SATURDAY 4-30-98~~

OMEP ALL (EXCEPT OWNERS)

DANT GRANDMAS GIVE, CANDY FOR CAROL

TOTT LOOK AT SWEETIE, SPIRIT OF MARY

ROBY NONE

~~SUNDAY 5-1-98~~

OMEP ALL (NO OWNERS)

DANT NONE

TOTT LOOKING AT SWEETIE, CANDY FOR C

ROBY SA COU, LOOK AT SWEETIE, SHO

~~MONDAY 5-2-98~~

OMEP ALL

DANT CANDY FOR CAROL

TOTT LOOK AT SWEETIE, SPIRIT OF MARY

ROBY NONE

~~TUESDAY 5-3-98~~

OMEP ALL

DANT NONE

TOTT LOOK AT SWEETIE, SPIRIT OF MARY

ROBY NONE

~~WEDNESDAY 5-4-98~~

OMEP ALL

DANT NONE

TOTT SPIRIT OF MARY, LOOK AT SWEETIE

ROBY NONE



~~TUESDAY 4-26-99~~

MR

ALL

WANT

GRANDDAUGHTER, CANDY FOR CAROL

TOGETHER

LOOKING AT SWEETIE, SPIRIT OF MARY

ROBY

NONE

~~WEDNESDAY 4-27-99~~

MR

ALL

WANT

GRANDDAUGHTER, CANDY FOR CAROL

TOGETHER

LOOKING AT SWEETIE, SPIRIT OF MARY

MR

MRS COSTA RICA

ROBY

NONE

~~THURSDAY 4-28-99~~

MR

ALL

WANT

GRANDDAUGHTER, CANDY FOR CAROL

TOGETHER

LOOKING AT SWEETIE, SPIRIT OF MARY

ROBY

NONE

~~FRIDAY 4-29-99~~

MR

ALL

WANT

GRANDDAUGHTER, CANDY FOR CAROL

TOGETHER

LOOKING AT SWEETIE, SPIRIT OF MARY

ROBY

NONE

SATURDAY 4-23-99

ANTHONY GRANOLA GIRL, CANDY FOR CARMEL

MELODY ALL

OCT SPIRIT OF MAVEVA, LOOKING AT SWEETIE

BOB SAICOW, LOOKING AT SWEETIE, SHOOTERS SHOOT

PROVENA TORRENTA, GRANOLA GIRL

SPIRIN KARTSELIAN

SUNDAY 4-24-99

ANTHONY GRANOLA GIRL, CANDY FOR CARMEL

MELODY ALL

OCT SPIRIT OF MAVEVA, LOOKING AT SWEETIE

SP KARTSELIAN

BOB SAICOW, LOOKING AT SWEETIE, SHOOTERS SHOOT

PROVENA TORRENTA

MONDAY 4-25-99

ANTHONY GRANOLA GIRL, CANDY FOR CARMEL

MELODY ALL

OCT SPIRIT OF MAVEVA, LOOKING AT SWEETIE

BOB SAICOW, LOOKING AT SWEETIE, SHOOTERS SHOOT

GRANOLA GIRL, PROVENA TORRENTA

SP KARTSELIAN

**WINNERS**  
—EQUINE PRODUCTS—



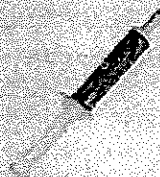
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- INJURED?
- EUTH?
- OTHER?

\* AN: 2410000000

5/10/22	From	5/10/22
	TO: 6422-100	

2410000000  
 (7) 853-3274

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D1043487



LIST 2/21







STATE OF CALIFORNIA - CALIFORNIA HORSE RACING BOARD  
**REPORT OF EQUINE DRUG EVIDENCE  
 COLLECTED, PURCHASED OR SEIZED**  
 CHRB-208 (REV. 7/2008)

CASE NUMBER  
22SA0092

FILE TITLE  
SEIZED Evidence

DATE: 5/8/2022  
 INVESTIGATOR: J. Garrido  
 DATE TAKEN INTO CUSTODY: 5/8/2022 2:00 P.M.

TRACK WHERE OBTAINED: Santa Anita  
 TRACK ADDRESS: 285 W. Huntington Drive, Arcadia, CA 91007

BARN / STALL: 116 / 60 - Trainer Richard Baltas  
 LICENSEE / LICENSE NUMBER: Richard Baltas, CHRB I.J.C.# 232550 - 5/31/2022

HOW OBTAINED:  
 PURCHASE  SEIZURE  SURRENDER  REFERRAL  COMPLIANCE SAMPLE

IF REFERRED, NAME OF REFERRING AGENCY: \_\_\_\_\_  
 CASE NUMBER: \_\_\_\_\_  
 OFFICER: \_\_\_\_\_

**LABORATORY SUBMISSION**

UCD KENNETH L. MADDY LABORATORY  OTHER

EXHIBIT NUMBER	DRUG	DESCRIPTION	WEIGHT IN GROSS GRAMS		
			SEIZED	SUBMITTED	RETAINED
EV0740		1 - Syringe of X-Treme Air Boost (Used)	X		

REMARKS: Evidence seized from bam #116 stall 60 during inspection.

SUBMITTED BY (INVESTIGATOR'S NAME): Jeanne Garrido  
 APPROVED BY (SUPERVISING INVESTIGATOR'S NAME): K. Kitashima  
 SIGNATURE: [Signature] DATE: 5/8/2022  
 SIGNATURE: [Signature] DATE: 5/8/2022  
 TELEPHONE NUMBER: 916-842-8860 FAX NUMBER: 626-821-1517

**FOR LABORATORY USE ONLY**

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