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**To:** angela.martinez@veterinary.texas.gov; enforcement@veterinary.texas.gov  
**Cc:** legal@veterinary.texas.gov  
**Subject:** Addendum Complaint – Submission of False and Misleading Medical Information by Club Hill Animal Clinic

Dear Enforcement Division,

I am submitting this addendum to Complaint CP26-0023 to formally report that Club Hill Animal Clinic provided false, misleading, and unsubstantiated medical information to the Texas Board of Veterinary Medical Examiners during the investigation of my complaint. These false statements materially influenced the medical reviewer's conclusions and must be addressed as a separate violation.

## 1. False Medical Claims Submitted to the Board

The clinic reported that my dog, Joey, had:

- Stage 4 dental disease
- A swollen abdomen
- Generalized alopecia
- Multiple chronic or age-related internal disease processes
- Symptoms consistent with advanced systemic illness

These claims are **factually incorrect** and **unsupported by any diagnostics, medical records, or recent examinations**. Joey had not been seen at this clinic for several years, and no evidence exists to justify these statements.

The clinic's assertions were accepted by the medical reviewer despite the absence of:

- Diagnostic testing
- Imaging
- Laboratory results
- Prior medical documentation
- Any objective evidence whatsoever

This constitutes the submission of false information to a regulatory body.

## 2. False Statements Used to Shift Blame and Avoid Accountability

The clinic's fabricated medical conditions appear intended to:

- Shift responsibility for Joey's death away from the clinic
- Create a false narrative of pre-existing illness
- Undermine the credibility of my complaint
- Influence the Board's decision-making process

These actions obstruct the investigative process and violate the standards of honesty and professional conduct required of licensed veterinary professionals.

### 3. Contradiction With Actual Evidence

The clinic's claims directly contradict:

- Joey's actual medical history
- His physical condition immediately before the nail trim
- Photographs and video showing no signs of the conditions claimed
- The X-ray taken immediately after his death
- A radiologist's remarks identifying abnormalities consistent with trauma

The clinic provided no evidence to support their statements, while my evidence clearly refutes them.

### 4. Harm Caused by the False Information

The false information submitted by the clinic:

- Influenced the medical reviewer's findings
- Contributed to the recommendation for dismissal
- Obstructed a fair and accurate evaluation of the complaint
- Misled the Enforcement Division
- Undermined the integrity of the investigative process

This conduct warrants investigation as a **separate violation** under TBVME rules regarding honesty, accuracy, and truthful communication with the Board.

### 5. Request for Action

I respectfully request that the Enforcement Division:

1. **Open a separate investigation** into the clinic's submission of false medical information.
2. **Correct the record** in Complaint CP26-0023 to reflect that the clinic's statements were unsubstantiated and inaccurate.
3. **Provide this addendum to the Legal Division and the Board** prior to the vote on the recommended dismissal.
4. **Review the clinic's history of complaints and disciplinary actions**, which further supports the need for scrutiny.

### Conclusion

The clinic's submission of false information is a serious matter that directly impacted the investigation into Joey's death. I ask that this addendum be formally added to the case file and addressed as a separate violation.

Thank you for your attention to this matter.

Sincerely,

Randy Clark