

COMPLAINT

CASE NUMBER: 20SR0024

The CHRB hereby files a complaint against **Charlton, Roshan** for violation of CHRB Rule **1588(15), 1843(a,b&d), 1843.1(a), 1866(e&f) & 1887(a)**. The person named in this complaint holds a license as a **Trainer**, license number **400239-09/2022**. The offense alleged occurred on or about **April 4, 2020** and is as follows:

Official work blood sample #NC44085 taken on April 4, 2020 at San Luis Rey Training Center from the horse, "Sunshine Elsie" was reported by Ben Moeller, PhD of the Maddy EACL at UC Davis contained Caffeine (174 ng/mL). The horse, "Sunshine Elsie" worked for the official veterinarians on April 4, 2020 as a four (4) year old unstarted maiden to be eligible to start. The split analysis was not requested in accordance to 1859.25. Charlton, Roshan is the trainer of record. Caffeine is a prohibited drug substance, class 2/B .

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 : 04-21-2020	Complainant : CHRB - A. Merz
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NOTICE TO APPEAR

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

Location:	Date:	Time:
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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 A. MERZ	Date 05-20-2020
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Rick M Arthur, DVM
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Date: 2020.05.20 07:52:16 -07'00'

APPROVED
pmj