

COMPLAINT

CASE NUMBER: **23LA0021**

The CHRB hereby files a complaint against **Santos Perez , Enrique Gonzalez & Irving Lara** for violation of CHRB Rule **1859.5**. The person named in this complaint holds a license as a **Trainer, Owner & Jockey**, license number **297066-04/2023, 226673-06/2023 & 328612-03/2025**. The offense alleged occurred on or about **1/28/2023** and

is as follows:

Official urine sample #LA52608 taken on 1/28/2023 at LARC from horse, "Crystal Prize" was reported by Ben Moeller, PhD of the Maddy EACL at UC Davis contained Caffeine. Caffeine is a prohibited drug substance, class 2, penalty class B. The horse, "Crystal Prize" ran in the 7th race finishing 2nd . Split sample analysis confirmed the violation. Santos Perez is the trainer of record. Enrique Gonzalez is the owner of record. Irving Lara is the jockey of record.

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 : 5/6/2023	Complainant : CHRB Barrett Halcromb
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NOTICE TO APPEAR

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

Location: Los Alamitos	Date: 6/20/2023	Time: 9:00
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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	Date 5/6/2023
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DISPOSITION OF CASE

The stewards have taken the following action on CASE NUMBER: **23LA0021**

Steward

Date

Steward

Date

Steward

Date