

COMPLAINT

CASE NUMBER: 20SW0004

The CHRB hereby files a complaint against **William Collins** for violation of CHRB Rule **1843(a),(b)&(d), 1843.1(a), 1843.5 (c) 1887(a), 1890(a) & (b), 1840**. The person named in this complaint holds a license as a **Trainer**, license number **400652 Exp. 07/2022**. The offense alleged occurred on or about **January 3, 2020** and is as follows:

The official blood sample taken on January 3, 2020 at Cal Expo was reported by Dr. Ben Moeller, PhD of U.C. Davis Laboratories, to contain 6.1 ng/mL of Methocarbamol. The sample was obtained from the horse "Beaus Cowboy" which ran in the 8th race at Cal Expo, finishing 1st. The trainer of record was William Collins (Lic. #400652 Exp. 07/2022). During a subsequent barn inspection and interview, a hypodermic needle and syringe was located. Trainer Collins admitted to having injected "Beaus Cowboy" on the Cal Expo grounds at least twice. A split sample was not requested. The level of Methocarbamol is a Class 4, Penalty C Violation.

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 : 03/20/2020	Complainant : Investigator Hunter Bartholomew
--------------------------	--

NOTICE TO APPEAR

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

Location: Board of Stewards Office, Cal Expo, CA	Date:	Time:
---	-------	-------

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
--------------	------

DISPOSITION OF CASE

The stewards have taken the following action on CASE NUMBER:

Steward

Date

Steward

Date

Steward

Date