

**ARIZONA DEPARTMENT OF GAMING - RACING DIVISION
STEWARDS' RULING**

TURF PARADISE: 2018-2019 MEETING

Under the authority granted by Arizona Revised Statutes Title 5, Chapter 1, and Arizona Administrative Code Title 19, Chapter 2, the Board of Stewards at TURF PARADISE, located at 1501 W. Bell Road, Phoenix, 85023, held a hearing on Friday, October 12, 2018 and issued the following Ruling:

JONES, VERLIN DEAN

SYSTEM ID: 18082

RULING NUMBER: 18-19TP005

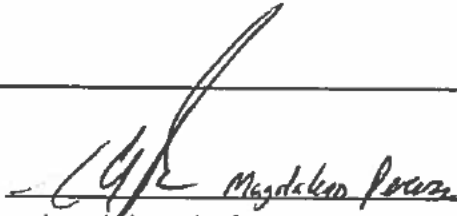
LICENSE NUMBER: 18082

Veterinarian Verlin Dean Jones (ADG #18082) is hereby restored to good standing after fulfilling the settlement agreement of the State of Arizona and the suspension being lifted by the Iowa Racing and Gaming commission on October 12, 2018.

The above described matter constitutes a violation in accordance with:
A.A.C. R19-2-106.C; A.A.C. R19-2-112.11.; A.A.C. R19-2-112.12.; A.A.C. R19-2-121.E.2.

BY ORDER OF THE STEWARDS





Pursuant to Arizona Racing Commission rules and regulations, the Stewards shall advise the Director of all hearings and rulings made. The Stewards may refer any ruling made by them to the Director, recommending further actions, including license revocation. This ruling may be appealed in writing to the Director, Arizona Department of Gaming - Racing Division within three race days from the date of the receipt of this Stewards' ruling. The Director may sustain, reverse, or modify any decision of the Stewards and may sustain, increase or decrease any penalty imposed by the Stewards.

ADDRESS:

[Redacted Address]

SERVICE: Mailed Personal Delivery

By

Date


10-12-18

ARIZONA DEPARTMENT OF GAMING
1110 W. Washington, Suite 450
Phoenix, AZ 85007
Ph 602-364-1700 Fax 602-364-1703
ador@azracing.gov - racing.az.gov



18-19TP005

TURF PARADISE
Board of Stewards
1501 W. Bell Road, Phoenix
85023, AZ 602-866-1890
Ph 602-375-6496

1 STATE OF ARIZONA
2 DEPARTMENT OF GAMING
3 RACING DIVISION

3 In the Matter of:
4 VERLIN JONES, DVM,
5
6 License #: 18082

Case No.: 19A-002-DOR
SETTLEMENT AGREEMENT

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9 **SETTLEMENT AGREEMENT AND RELEASE**

10 This SETTLEMENT AGREEMENT AND RELEASE ("Agreement") is entered into by and
11 between the ARIZONA DEPARTMENT OF GAMING, RACING DIVISION ("Racing Division") by
12 and through its Director, or his designee, and VERLIN JONES, DVM ("Dr. Jones") and shall be
13 effective on the last day of execution by the parties ("Arizona Parties").

14 **RECITALS**

- 15 A. On September 14, 2017, the Arizona Department of Racing issued a veterinarian license
16 to Dr. Jones.
- 17 B. On July 30, 2018, the Board of Stewards at Turf Paradise Racetrack (the "Stewards")
18 suspended Dr. Jones' license for one hundred eighty (180) calendar days, retroactive to June
19 10, 2018, and effective through January 6, 2019. This ruling ("Stewards' Ruling No. 18-
20 19TP002") was based on a revocation of Dr. Jones' occupational license by the Iowa Racing
21 and Gaming Commission ("IRGC"), which ultimately became effective on April 13, 2017.
- 22 C. Dr. Jones filed a timely appeal of Stewards' Ruling No. 18-19TP002, and the Racing
23 Division set an appeal hearing on September 25, 2018.
- 24 D. By settlement agreement with the IRGC, Dr. Jones' Iowa revocation was amended to an
25 eight-month suspension, to end at 11:59 p.m. on October 12, 2018.
- 26

1 E. Upon request by Dr. Jones, the Arizona Parties conducted a settlement conference
2 regarding Stewards' Ruling No. 18-19TP002, on August 31, 2018.

3 F. In order to resolve this matter, the Arizona Parties now desire to enter into this
4 Agreement to settle and compromise all claims related to Stewards' Ruling No. 18-19TP002, in
5 lieu of further administrative and judicial proceedings, and consistent with the public interest and
6 the requirements and statutory authority of the Racing Division, specifically, A.R.S. §§ 5-104(B),
7 5-108.05, and 41-1092.07(F)(5).

8 **TERMS AND CONDITIONS**

9 1. Subject to the terms and conditions of this Agreement, and in consideration
10 therefor, Dr. Jones and the Racing Division agree that:

11 a. Pursuant to A.R.S. §§ 5-108.05(A) and 5-115(C), the Racing Division may
12 assess civil penalties, suspend, revoke a license, or impose probation
13 requirements or any combination of these sanctions, based on any of the
14 grounds for which the Racing Division could refuse to issue a license
15 pursuant to A.R.S. § 5-108 or for a violation of any provision of the
16 statutes or the rules of the Commission or the Racing Division.

17 b. The Racing Division asserts that sufficient evidence exists to substantiate
18 that Dr. Jones committed a violation of IRGC rules and statutes, as
19 outlined in the IRGC settlement agreement.

20 c. In exchange for concessions in this Agreement, Dr. Jones waives his right
21 to appeal Stewards' Ruling No. 18-19TP002, or to appeal the imposition
22 of any penalty, and waives any and all other administrative or judicial
23 remedies he may have with respect to Stewards' Ruling No. 18-19TP002.

24 d. The hearing, set on September 25, 2018, will be vacated.

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- 1 e. Dr. Jones's license shall remain in suspended status, but the length of the
2 suspension will be reduced and shall terminate at 11:59 p.m., on October
3 12, 2018.
- 4 f. Dr. Jones's failure to fulfill obligations under this Agreement may render
5 this Agreement null and void and subject Dr. Jones to further disciplinary
6 proceedings in this matter.
- 7 g. This Agreement does not affect the Racing Division's right to discipline
8 Dr. Jones for any new or undiscovered violations of any provision of the
9 statutes or the rules of the Commission or the Racing Division.
- 10 2. The parties agree to settle, compromise, and release any and all past, present or
11 future claims, demands, obligations, actions, causes of action, rights, damages, costs,
12 expenses, and compensation of any nature whatsoever, whether known or unknown at the time
13 this Agreement is executed, that may have resulted or hereafter result from, have been caused
14 or may be claimed to have been caused by, or are arising out of, the acts or omissions alleged
15 in Stewards' Ruling No. 18-19TP002.
- 16 3. Dr. Jones agrees to abide, at all times, by the terms and conditions set forth in
17 the Arizona Revised Statutes, Title 5, Chapter 1, Article 1, Horse Racing; the Arizona
18 Administrative Code, Title 19, Chapter 2, Article 1, Horse Racing Rules; state and federal Laws;
19 and all written race track policies.
- 20 4. The parties further agree that each side shall bear their own costs and attorneys'
21 fees, if any.
- 22 5. This Agreement represents the entire Agreement of the parties with respect to
23 the subject hereof, and no representations, warranties, inducements, or oral agreements have
24 been made by any of the parties as previously set forth herein.
- 25 6. This Agreement is to be construed and interpreted in accordance with the laws of
26 the State of Arizona.


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IN WITNESS THEREOF, the parties have executed this Agreement below.

ARIZONA DEPARTMENT OF GAMING,
RACING DIVISION

VERLIN JONES, DVM

By: 
Kristian Fasching
Agency Counsel
Date: 8-31-2018

By: 
Dr. Verlin Jones
Date: 8/31/18