

PUBLIC

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES
FTC DOCKET NO. D-9446

ADMINISTRATIVE LAW JUDGE: JAY L. HIMES

IN THE MATTER OF: ZVI KRIPLE, APPELLANT

**AUTHORITY’S REPLY BRIEF, REPLY FINDINGS OF FACT
AND CONCLUSIONS OF LAW**

Comes now the Horseracing Integrity and Safety Authority (the “Authority”) pursuant to the briefing schedule provided by the Administrative Law Judge, and submits the following Reply Brief, Reply Proposed Findings of Fact and Conclusions of Law.

STURGILL, TURNER, BARKER & MOLONEY,
PLLC

/s/ Bryan Beauman

BRYAN BEAUMAN

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HISA ENFORCEMENT COUNSEL

REPLY FINDINGS OF FACT*A. Respondent and His Livelihood*

- 1. Respondent is a licensed horse trainer and owner who has invested his life savings into the training and racing of horses.*

The Authority agrees that Respondent was a licensed horse trainer. The Authority has no knowledge of Respondent's finances.

- 2. Respondent has no prior safety violations under HISA.*

The Authority states that the Respondent has no prior HISA violations.

- 3. Participation at HISA-regulated racetracks is essential due to significantly higher purses that support training, veterinary care, and stable operations.*

The Authority has no specific response to this statement.

- 4. The suspension effectively prevents Respondent from sustaining his profession.*

The suspension prevents Respondent from participating in Covered Horseraces for two years.

B. Events of August 23-24

- 5. On August 23, the horse at issue did not compete in a race and was only under training.*

Agree.

- 6. At approximately 12:30 p.m. on August 23, Respondent personally asked Belterra Park security about the availability of a veterinarian on the grounds.*

The Authority has no specific response.

- 7. Respondent was informed that the replacement veterinarian had left early and that no veterinarian was available.*

The Authority has no specific response.

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8. *On the afternoon of August 23, Respondent called Dr. Renn requesting assistance.*

Agree.

9. *Dr. Renn declined to come to the grounds but offered at-hand medication and stated he would examine the horse the following Monday morning at approximately 6:30 a.m.*

Dr. Renn informed Respondent he was 100 miles away and unable to treat the horse, but that the horse needed immediate treatment.¹ Dr. Renn testified he would next be at the track at 6:00 a.m. Monday morning, and that he would “look at it if [he] was there.”² Dr. Renn instructed Respondent to “seek care from Park Equine or a local vet.”³

10. *The horse began showing signs of stress later in the evening of August 24, not earlier.*

Respondent contacted Dr. Renn and informed him that ROYAL HONEY had “been colicking” since August 23, 2025.”⁴

C. Failure of Mandatory Emergency Protocols

11. *HISA Rule 2160 requires racetrack authorities to maintain mandatory emergency veterinary protocols*

Disagree. HISA Rule 2160 “Emergency Preparedness” is a chapter regulating Covered Racetracks’ Emergency Preparedness. At no point in the chapter are “emergency veterinary protocols” mentioned.

12. *Belterra Park failed to ensure the availability of emergency veterinary care.*

Legal conclusion. Regardless, Belterra Park was not the Responsible Person for ROYAL HONEY and had no obligation to provide veterinary care. Respondent was the Responsible Person for the horse with the obligation to provide veterinary treatment.

¹ Tab 9 – HISA Hearing Exhibit 3 – Dr. Timonthy Renn’s Veterinary Report (Signed) at 1.

² Tab 6 – Renn (p. 35-36, 1:37-1:38:03).

³ Tab 6 – Renn (p. 35-36, 1:37-1:38:03).

⁴ Tab 6 – Renn (p. 35-36, 1:37-1:38:03).

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13. Respondent lacked authority or ability to compel compliance with racetrack emergency obligations.

Legal conclusion. The Authority has never alleged that Respondent was responsible for compelling Belterra Park to comply with “emergency obligations.”

14. Belterra’s failure directly contributed to the circumstances later alleged against Respondent.

Legal conclusion. Respondent, the Responsible Person for ROYAL HONEY, is singularly responsible for the welfare ROYAL HONEY while in his care. Belterra Park had no obligation to provide Respondent with attending veterinary care.

D. Absence of Veterinary Examination and Speculative Diagnosis

15. No veterinarian physically examined the horse during the relevant period.

Agree. Respondent failed to provide ROYAL HONEY with veterinary treatment for her colic despite being offered assistance in locating and transporting her to a veterinarian.⁵ A necropsy was performed to establish the horse died of a large colon volvulus.⁶

16. No diagnostic testing, blood work, or clinical evaluation was performed.

The Authority agrees and refers to the above response.

17. Allegations that the horse suffered from “colic” were assumptive and unsupported by medical evidence.

Disagree. Dr. Sutherland and Dr. Renn each authored reports and testified that ROYAL HONEY died from colic.⁷ Dr. Kennedy also performed a necropsy confirming the horse suffered a large colon volvulus.⁸

⁵ Tab 10.

⁶ Tab 8.

⁷ Tab 1 at 1.

⁸ Tab 8.

18. Equine veterinary data establishes that the majority of horses exhibiting colic-like symptoms recover with at-hand treatment in stable or farm environments.

No evidence in the record exists to support this claim.

E. False and Unsupported Testimony Regarding Alternative Veterinary Care

19. At the HISA hearing, Dr. Renn testified that he offered to contact other veterinarians and/or transport the horse to a veterinary clinic in Kentucky.

Disagree. Dr. Renn testified that Respondent should contact Park Equine or another local veterinarian for treatment.⁹ Dr. Renn testified that other trainers at Belterra Park had identified Dr. Tony Wolfe in Crittenden, Kentucky who agreed to treat ROYAL HONEY.¹⁰

20. Respondent objected to this testimony.

Agree.

21. Dr. Renn's assertions were unsupported by documentary evidence, including text messages, call logs, emails, or contemporaneous notes.

Disagree. Dr. Renn testified under oath at the hearing¹¹ and provided a sworn written statement.¹² Also, Respondent testified that he contacted Dr. Renn regarding ROYAL HONEY's medical condition via phone call.¹³

22. No veterinarian was identified who confirmed availability.

Disagree. Both Dr. Renn and Steward Pate testified that trainers at Belterra Park contacted Dr. Tony Wolfe who would accept ROYAL HONEY for treatment or humane euthanasia.¹⁴

23. No Kentucky clinic was identified that confirmed readiness to receive the horse.

Disagree. See the above response.

⁹ Tab 6 – Renn (p. 24, 1:09:57; p. 35, 1:37:36).

¹⁰ Tab 6 – Renn (p. 28, 1:19:58-1:20:14).

¹¹ Tab 6 – Renn (p. 22, 106:54-1:07:00).

¹² Tab 9.

¹³ Tab 6 – Renn (p. 33, 1:33:53-1:34:40); *Id.* Kriple (p. 43, 2:00:04).

¹⁴ Tab 6 – Renn (p. 28, 1:19:58-1:20:14); *Id.* Pate (p. 13, 38:55).

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24. *No evidence established that any such offer was real, actionable, or feasible.*

Disagree. See the above response. Respondent raised a hearsay objection to this testimony at the hearing¹⁵ but presented no evidence to contradict the testimony of Dr. Renn or Steward Pate.

25. *The Administrative Record contains no evidence that Respondent declined a viable veterinary option.*

Disagree. Testimony and written statements from Dr. Renn and Steward Pate evidence that Respondent declined offers of assistance for Dr. Wolfe to treat ROYAL HONEY.¹⁶

26. *The testimony was uncorroborated, speculative, and contradicted by the absence of proof.*

Disagree. See the above response.

F. Improper Reliance on Non-Witness

27. *HISA relied on statements attributed to Trainer Christy Estvanko [sic].*

Agree in part. As Dr. Renn stated, trainers “Pearl Chain, Steve Sandy, and Christy Estvanko” offered Respondent free transportation for ROYAL HONEY to be taken to Dr. Wolfe for treatment.¹⁷ Regardless of any specific statement made by Ms. Estvanko, Dr. Renn spoke with Pearl Chain on the telephone regarding ROYAL HONEY’s condition and the offer to transport the horse to receive veterinary care.¹⁸

28. *Ms. Estvanko [sic] was not present at Belterra Park on the evening in question.*

Disagree. Dr. Renn testified Ms. Estvanko was present at Belterra Park at relevant times.¹⁹ Further, as the Authority posited in its initial brief to the ALJ, Equibase records indicate Ms.

¹⁵Tab 6 – Kriple (p. 14, 41:43).

¹⁶ Tab 6 – Renn (p. 28, 1:19:58-1:20:14); *Id.* Pate (p. 13, 38:55); Tab 9; Tab 10.

¹⁷ Tab 9.

¹⁸ Tab 6 – Renn (p. 26-28, 1:15:50-1:20:49).

¹⁹ Tab 9.

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Estvanko and her husband had five horses that raced from August 23 to August 25, 2025, giving credence to her presence then.

29. She had no first-hand observation of the horse.

Disagree. See above responses.

30. Her alleged statements were opinion-based and not grounded in personal knowledge.

Disagree. See above responses.

G. Ignored Supporting Evidence

31. Respondent possessed text message evidence from Trainer Steve Sandy confirming Respondent's efforts to obtain veterinary care.

Disagree. Respondent produced an unverified text message at the hearing.²⁰ Respondent did not provide any foundational evidence or testimony to confirm who the text message was from.

32. HISA nevertheless asserted that Respondent had no supporting witnesses.

Agree. Respondent produced an unverified text message at the hearing.²¹ He did not produce any witness testimony.

H. Procedural and Due Process Violations

33. On or about September 22, HISA announced that a hearing would be held on October 20.

At the September 22, 2025, all parties agreed to – and the IAP Member ordered – that the hearing would occur on October 20, 2025. This was memorialized in an email following the conference.

²⁰ Tab 6 – Kriple (p. 41, 1:49:44-1:51:08).

²¹ Tab 6 – Kriple (p. 41, 1:49:44-1:51:08).

34. Respondent objected by email to the hearing date due to insufficient time to prepare.

Respondent was present at the September 22, 2025 status conference where he agreed to the dates and deadlines memorialized in the September 22, 2025 email. Mr. Kriple responded to counsel for the Authority on September 25, 2025 stating that he was collecting information and requested “not [to] commit dates yet.” Counsel for the Authority responded to Mr. Kriple’s message later that day, copying the IAP Member, and advising Mr. Kriple that since the IAP Member had already ordered dates and deadlines, he would need to take up his request with the IAP Member who instructed Mr. Kriple that if he “need[s] extra time, please apply to me directly with an explanation of your difficulties and proposed deadline.”²² Mr. Kriple did not respond to the IAP Member’s message.

35. That objection was not disclosed or acknowledged in subsequent representations.

Disagree. See above response.

36. Respondent was forced to proceed to hearing within approximately 28 days.

Disagree. Mr. Kriple agreed to the hearing date at the September 22, 2025 status conference. He failed to respond to the IAP Member’s email setting out the process for requesting new dates and did not object to the timing of the hearing at the date of the hearing.

37. Respondent appeared pro se.

Agree.

²² This email is attached as Attachment 1.

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38. HISA had access to pro bono counsel resources for pro se respondents but did not offer such assistance.

The Authority established a Covered Person Pro Bono Program which matches volunteer attorneys with Covered Persons charged with an ADMC Violation. There is no Pro Bono program for racetrack safety violations. Moreover, Respondent did not apply for Pro Bono services.

39. Prior to the hearing, HISA offered an 18-month suspension in exchange for an admission of deprivation of medical care.

Disagree. As reflected in the October 8, 2025 email communication, counsel for HISA submitted a proposed Agreed Order to resolve the matter for a 2-year suspension.

40. Respondent refused to admit conduct he did not commit.

Respondent did not agree to the Agreed Order.

I. Prior Belterra Proceedings and Collateral Estoppel

41. Belterra stewards convened a hearing on the same underlying issue with minimal notice.

Agree in part. Belterra Park stewards conducted an Ohio State Racing Commission hearing for Respondent's violation of Ohio State Racing Commission regulations.²³ The Authority has no knowledge of the notice provided to Respondent.

42. Respondent lacked time to prepare and had no counsel.

The Authority has no knowledge and was not a party to the Ohio State Racing Commission proceeding separate from the Ruling it issued.

43. Respondent was sanctioned and compelled to surrender his license for life.

The Authority states that the Ruling speaks for itself.

44. Respondent raised collateral estoppel, which was denied.

²³ Tab 12 – HISA Hearing Exhibit 6 – August 29, 2025 Ohio Stewards' Ruling (10.20.2025).

The Authority has no knowledge of and was not a party to the Ohio State Racing Commission proceeding separate from the Ruling it issued.

REPLY CONCLUSIONS OF LAW

45. HISA failed to establish by substantial evidence that the horse suffered from colic.

The Authority has clearly established that ROYAL HONEY suffered from colic. First, Dr. Laura Kennedy, a University of Kentucky pathologist, conducted a necropsy of ROYAL HONEY.²⁴ Dr. Bart Sutherland, a veterinary welfare consultant, conferred with Dr. Kennedy regarding her findings.²⁵ Dr. Kennedy informed Dr. Sutherland that ROYAL HONEY suffered a large colon volvulus.²⁶ From this, Dr. Sutherland concluded in his welfare assessment that the horse suffered a large colon volvulus, “one of the most painful types of colic.”²⁷ He testified at the hearing that this condition is “very aggressive, very acute, very dangerous if left untreated.”²⁸

Dr. Renn testified Respondent contacted him on August 24, 2025 because the horse “had a colic. He said the horse had been colicking since late afternoon Saturday, and had not had any medicine and was getting bad.”²⁹ Steward Pate testified “the horse showed signs of colic on 8/23 in the evening, which was Saturday evening...I believe Dr. Tim Renn informed me that you had a horse that had a colic and he was, or suggested you take the horse to the clinic.”³⁰ Even Respondent testified he suspected ROYAL HONEY began to colic on August 23, 2025.³¹

²⁴ Tab 8 – HISA Hearing Exhibit 2 – Dr. Laura Kennedy’s Pathology Report (10.20.2025).

²⁵ Tab 1 at 7.

²⁶ Tab 1 at 7

²⁷ Tab 1 at 1.

²⁸ Tab 6 – Sutherland (p. 8, 22:34).

²⁹ Tab 9.

³⁰ Tab 6 – Pate (p. 15, 44:50).

³¹ Tab 6 – Kriple (p. 42-43, 1:54:40).

No witness or party at any stage in these proceedings raised any factual dispute whether ROYAL HONEY suffered from colic. The pathology report and welfare assessment conducted by Dr. Sutherland clearly indicate that ROYAL HONEY suffered from colic.³²

46. Medical conclusions cannot lawfully be drawn without examination or testing.

The Authority asserts that ROYAL HONEY suffered a large colon volvulus based on necropsy findings made by Dr. Kennedy.³³ A necropsy is a post-mortem veterinary examination of a horse.

47. An administrative sanction may not rest on uncorroborated and objected-to testimony.

The Authority has presented testimony and sworn statements from witnesses, necropsy findings, and Dr. Sutherland's welfare assessment of ROYAL HONEY. Respondent's objections alone to testimony do not deem any portion of the testimony inadmissible.

48. Reliance on Dr. Renn's unsupported assertions violated the substantial evidence standard.

The Authority is unaware of the "substantial evidence standard" to which Respondent refers as no substantial evidence standard applies to IAP proceedings. Dr. Renn's testimony was provided under oath, and he also provided a sworn written witness statement to the IAP.³⁴

49. Belterra's failure to comply with Rule 2160 cannot be imputed to Respondent.

Respondent's failure to provide ROYAL HONEY with necessary veterinary treatment for her colic resulted in her suffering a large colon volvulus. Respondent violated Rule 2215 when he, the Responsible Person for ROYAL HONEY, failed to provide her with potentially life-saving veterinary care. Respondent is the only person tasked with ensuring the horses in his care receive

³² Tab 1 at 1.

³³ Tab 1 at 1.

³⁴ Tab 6 - Renn (p. 22, 1:06:54-1:07:00); Tab 9.

all necessary veterinary care. In fact, there is no Rule 2160. The Authority has never alleged that Respondent violated Rule 2160 or that any conduct by Belterra Park resulted in Respondent's violation of Rule 2215.

50. The accelerated hearing schedule denied Respondent due process.

The Authority in no way denied Respondent due process during these proceedings. Respondent attended the September 22, 2025 status conference with the IAP member and counsel for the Authority. At that conference, he agreed to dates and therein. Later that day, Respondent informed counsel for the Authority and the IAP member that he would like additional time to prepare for the hearing. The IAP member told Respondent that if he "need[s] extra time, please apply to me directly with an explanation of your difficulties and proposed deadline." Respondent did not respond to the IAP Member.

On October 20, 2025, Respondent appeared at the hearing. He cross-examined the Authority's witnesses, provided his testimony, and presented a text message for the IAP's consideration. Respondent was afforded a full hearing and, at multiple points during this matter, raised concerns with the IAP. However, he never replied to the IAP Member when prompted to provide additional information about his concerns. Respondent's failure to respond to the IAP member regarding scheduling and witness participation does not constitute a violation of due process. Respondent fully participated in the IAP hearing and appealed to the Board of the Authority where he received the opportunity to submit additional written statements for the Board's consideration. Respondent has now initiated this appeal to the ALJ. At no point in any of these proceedings has the Authority inhibited any due process or the opportunity to be heard.

51. The sanction is disproportionate and causes irreparable harm.

ROYAL HONEY died in her stall after suffering for two days from colic.³⁵ Her death may have been avoided had she received necessary veterinary treatment. Respondent was offered assistance in transporting ROYAL HONEY for treatment by Dr. Wolfe – yet refused. The two-year suspension is proportionate to the nature and severity of the violation in accordance with Rule 8200(d).

REPLY MEMORANDUM

On August 25, 2025, ROYAL HONEY suffered a large colon volvulus, fell out of her stall, and died a painful death.³⁶ Her death might have been prevented had she received veterinary treatment. However, she received no veterinary treatment.³⁷ Respondent violated Rule 2215 for his failure to provide his horse with necessary veterinary care. As a result, Respondent was suspended for two years. This sanction should be affirmed.

On August 23, 2025, ROYAL HONEY began to display signs of colic. Respondent did not seek veterinary care for her that day.³⁸ At midday the following day, Respondent contacted Dr. Renn, ROYAL HONEY's attending veterinarian. Dr. Renn was more than 100 miles away and could not treat the horse's condition, but recommended Respondent send her to a nearby equine hospital.³⁹ Dr. Renn stressed that ROYAL HONEY needed urgent care because untreated colic could kill her.⁴⁰ Later that day, Respondent again called Dr. Renn and informed him that ROYAL HONEY had not received veterinary care.⁴¹ Other trainers at Belterra Park contacted another

³⁵ Tab 9.

³⁶ Tab 1, Tab 9.

³⁷ Tab 9.

³⁸ Tab 9.

³⁹ Tab 9.

⁴⁰ Tab 9.

⁴¹ Tab 9.

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veterinarian who was willing to treat the horse and offered to ship her to that free of charge.⁴² However, Respondent did not accept these offers. Respondent never contacted another veterinarian to treat ROYAL HONEY's condition.⁴³ At 1:30 a.m. on August 25, 2023, Respondent left ROYAL HONEY unattended. She died two hours later.⁴⁴ Necropsy findings confirmed ROYAL HONEY died of a large colon volvulus, complications of colic.⁴⁵

Respondent deprived ROYAL HONEY of necessary veterinary care. Witness testimony and evidence in the record confirms this. The two-year suspension of his registration with the Authority should be affirmed based on Respondent's egregious deprivation of care for his horse and is proportionate to the nature and severity of the violation in accordance with Rule 8200(d).

⁴² Tab 9.

⁴³ Tab 9.

⁴⁴ Tab 9.

⁴⁵ Tab 1.

ARTIFICIAL INTELLIGENCE CERTIFICATION

I further certify that no portion of the filing was drafted by generative artificial intelligence.

/s/Bryan Beauman
HISA Enforcement Counsel

WORD COUNT CERTIFICATE

This document complies with the word limit of 16 C.F.R. § 1.146(c)(4), this document contains 2,315 words as counted by Microsoft Word.

/s/Bryan Beauman
HISA Enforcement Counsel

CERTIFICATE OF SERVICE

I hereby certify that on February 20, 2026, pursuant to Federal Trade Commission Rules of Practice 4.2(c) and 4.4(b), I caused the foregoing Reply of the Authority, to be electronically filed and served as provided below.

Office of Administrative Law Judges
Federal Trade Commission
600 Pennsylvania Ave. NW
Washington DC 20580
Via e-mail to OALJ@ftc.gov

April Tabor
Office of the Secretary
Federal Trade Commission
600 Pennsylvania Ave. NW
Washington, DC 20580
Via email: electronicfilings@ftc.gov

Zvi Kriple
4109 Haley Rd
Lexington, KY 40516
Via email: zkriple@yahoo.com

/s/Bryan H. Beauman
Counsel for Horseracing Integrity and
Safety Authority

ATTACHMENT

1

From: richard abbott <charltonbloodstock@hotmail.com>
Sent: Thursday, September 25, 2025 12:03 PM
To: Samuel Reinhardt <samuel.reinhardt@hisaus.org>; zvi kriple <zkriple@yahoo.com>
Cc: John Forgy Gmail <johnforgy1@gmail.com>; Anna Jacobs <anna.jacobs@hisaus.org>
Subject: Re: HISA v. Zvi Kriple, Case No. 2025-21507

EXTERNAL EMAIL - This email was sent by a person from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Mr. Kriple:

The dates in Mr. Reinhardt's are committed. If you need extra time, please apply to me directly with an explanation of your difficulties and proposed deadline.

Best,

Get [Outlook for iOS](#)

From: Samuel Reinhardt <samuel.reinhardt@hisaus.org>
Sent: Thursday, September 25, 2025 11:19:40 AM
To: zvi kriple <zkriple@yahoo.com>; richard abbott <charltonbloodstock@hotmail.com>
Cc: John Forgy Gmail <johnforgy1@gmail.com>; Anna Jacobs <anna.jacobs@hisaus.org>
Subject: FW: HISA v. Zvi Kriple, Case No. 2025-21507

Mr. Kriple,

I am copying IAP Member Richard Abbott on this response.

These dates and deadlines were agreed to by the parties and ordered by the IAP Member at the September 22 Status Conference. You will need to take up your request to modify the dates and deadlines with Mr. Abbott. Unless otherwise ordered, HISA intends to proceed under the dates and deadlines noted below.

Sam Reinhardt

Assistant General Counsel

c: 859.230.8842

w: www.hisaus.org (-> [url.avanan.click](#))

a: 201 East Main Street, Suite 340 Lexington, KY 40507



HORSERACING INTEGRITY
AND SAFETY AUTHORITY

From: zvi kriple <zkriple@yahoo.com>
Sent: Thursday, September 25, 2025 11:15 AM
To: Samuel Reinhardt <samuel.reinhardt@hisaus.org>
Subject: Re: HISA v. Zvi Kriple, Case No. 2025-21507

EXTERNAL EMAIL - This email was sent by a person from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Good morning!

I am in the process of collecting witness list as well as information from the Ohio commission. That might take some time so please let's not commit to dates yet.

Regards

Zvi Kriple

Ps. I'm not sure how to provide copy to Mr Abbott

[Sent from Yahoo Mail for iPhone](#)

On Monday, September 22, 2025, 2:39 PM, Samuel Reinhardt <samuel.reinhardt@hisaus.org> wrote:

Good afternoon,

This email will memorialize the dates and deadlines agreed to by the parties and

IAP Member Richard Abbott during the status conference today. If you have any corrections to the information provided below, please respond to this email by September 24, 2025.

1. The above matter is scheduled for a final hearing on Monday, **October 20, 2025**. The hearing will begin at 1:00 PM ET and will be conducted via Microsoft Teams. HISA will provide a Microsoft Teams link for the hearing.
2. On or before **September 29, 2025**, HISA shall provide to Mr. Kriple and IAP Member Abbott its witness and exhibit list for the October 20, 2025 hearing. The witness list shall include a brief summary of the anticipated testimony of each witness.
3. On or before **October 13, 2025**, Mr. Kriple shall provide to HISA and IAP Member Abbott his witness and exhibit list for the October 20, 2025 hearing. The witness list shall include a brief summary of the anticipated testimony of each witness.

Sam Reinhardt

Assistant General Counsel

c: 859.230.8842

w: www.hisaus.org (-> [url.avanan.click](#))

a: 201 East Main Street, Suite 340 Lexington, KY 40507



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AND SAFETY AUTHORITY**

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