

PUBLIC

**UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION  
OFFICE OF ADMINISTRATIVE LAW JUDGES  
FTC DOCKET NO. 9447**

**ADMINISTRATIVE LAW JUDGE:**

**JAY L. HIMES**

**IN THE MATTER OF:**

**CRAIG A. LEWIS**

**APPELLANT**

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**SECOND APPEAL BOOK SUPPLEMENT**

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May 4, 2026

Respectfully submitted,

STURGILL, TURNER, BARKER & MOLONEY,  
PLLC

/s/ Bryan Beauman

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HORSERACING INTEGRITY & WELFARE  
UNIT, A DIVISION OF DRUG FREE SPORT,  
LLC

PUBLIC

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# TAB 17

**Christy Heath**

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**From:** Christy Heath  
**Sent:** Tuesday, September 30, 2025 11:22 AM  
**To:** ldlewis.law@gmail.com  
**Cc:** craiglewisracing@gmail.com; Monica Pilarski  
**Subject:** RE: Kikuride, Race 11 at Del Mar on August 31, 2025; Sample: #B200035796  
**Attachments:** ae458413-46a6-48b5-81ae-c8edc1babdca.pdf; Kikuride Medical Record 8.29.2025.png; HIWU Chart.pdf

Mr. Lewis,

Good morning, sir. I received your email from our Results Management team. Please find attached the invoice related to the B Sample analysis. In order to make the payment, please phone HISA at the phone number listed on the invoice.

As it relates to Dr. Araujo's records, he should be able to provide those to you himself. However, I did attach a copy for your review of Kikuride's HISA Medical Records, which reflects an administration of Methocarbamol to Kikuride on August 29, 2025. Additionally, I included a document available on HIWU's website entitled: Known Detection Times and Screening Limits of Common Controlled Medications. The document better explains the distinction between Detection Times (which HISA provides) and Withdrawal Guidance (which HISA does not provide).

I further want to reiterate the language contained in ADMC Program Rule 3040(b)(6): Responsible Persons "bear strict liability for any violations of the Protocol by such Covered Persons (including Veterinarians), employees, personnel, agents, and other Persons involved in the care, treatment, training, or racing of his or her Covered Horses." I've included a link to the HISA ADMC Program Rules below; the 3000 Series will be the most helpful as it relates to this matter.

[Regulations - Horseracing Integrity and Safety Authority](#)

Please let me know if you have any further questions. Thank you.

V/r,

Christy Heath, Esquire | Litigation Counsel

**Horseracing Integrity & Welfare Unit**

**Drug Free Sport International**

C: (816) 814-4713

E: [cheath@hiwu.org](mailto:cheath@hiwu.org)

---

**From:** Larry Lewis <[ldlewis.law@gmail.com](mailto:ldlewis.law@gmail.com)>  
**Sent:** Monday, September 29, 2025 3:17 PM  
**To:** HIWU B Analysis <[banalysis@hiwu.org](mailto:banalysis@hiwu.org)>  
**Cc:** Craig Lewis <[craiglewisracing@gmail.com](mailto:craiglewisracing@gmail.com)>  
**Subject:** Kikuride, Race 11 at Del Mar on August 31, 2025; Sample: #B200035796

Dear Madams/Sirs:

This email is intended for Kitt K. Montgomery. Ms. Montgomery, I received a copy of your email dated September 25, 2025. I would be most appreciative if you cause the link for payment of the \$1,240 for the B Sample that we requested to be sent to my email so that it may be paid forthwith.

It is also my understanding that if a veterinarian administers an injection of robaxin or methocarbamol to a horse before a race, he/she must do so at least 48 hours in advance of the race and must submit a report concerning the same to the HIWU. In this case, John Araujo, DMV, injected Kikuride with robaxin or methocarbamol in advance of her race on August 31, 2025. I would be most appreciative if you could provide me with a copy of the report submitted to the HIWU by Dr. Araujo in advance of Kikuride's race on August 31, 2025. It may be sent to my email address.

I hope that you do not think that I am requesting too much by also asking for other similar reports for Kikuride's previous four races, namely, the reports submitted by Dr. Araujo, who has been Craig Lewis' veterinarian for several years and who provided the same treatment to Kikuride in each of her previous four races. Kikuride's previous four races took place on the following dates: July 31, 2025, May 18, 2025, April 25, 2025 and April 5, 2025. The reports from Dr. Araujo should have been submitted at least 48 hours before the above specified dates. They may also be sent to my email address.

If you would prefer that I address the foregoing requests to Christy Health, with whom I discussed this matter with on September 25, 2025, but whose email address I do not have, kindly provide me with Ms. Heath email address. Otherwise, I can ask her directly for her email address.. Alternatively, if there is another individual who is best suited to deliver to me copies of the reports submitted by Dr. Araujo, please provide the name, telephone number and email address of that individual.

Thank you very much for your anticipated courtesy and cooperation.

--

Lawrence D. Lewis, Esq.  
6444 E Spring St., #303  
Long Beach, CA 90815  
[ldlewis.law@gmail.com](mailto:ldlewis.law@gmail.com)  
562-858-8444

**Invoice**

Invoice number: HIWU-02587-3S4S  
 Date of issue: Sep 25, 2025  
 Date due: Oct 02, 2025  
 HISA Person: P000006069  
 HIWU Test Order #: HIWU-02587



**Horseracing Integrity & Safety Authority**

401 W. Main Street, Suite 222  
 Lexington, Kentucky 40507  
 United States  
 +1 816-800-8152  
 testpayments@hiwu.org

**Bill to**

Craig Lewis  
 craiglewisracing@gmail.com

**\$1,240.00 due Oct 02, 2025**

HIWU Test Order #: HIWU-02587

Description	Qty	Unit price	Amount
B Sample for Controlled Medication Substance, Kikuride	1	\$1,240.00	\$1,240.00
Subtotal			\$1,240.00
Total			\$1,240.00
Amount due			\$1,240.00

Please follow these steps to pay the invoice at your earliest convenience.

1. Click [HISA Portal](#) link to be redirected to Test Services tab in your HISA portal.
2. Click Pay Now

If you cannot make an online payment through the HISA Portal, please mail a check payable to HISA, along with a copy of this invoice to the following address:

HISA  
 401 W. Main Street, Suite 222  
 Lexington, Kentucky 40507

## Horse Health Info: M006124763



GENERAL

OTHER

**Horse:** Kikuride (H-000-133-812)

**Horse Location:** Santa Anita Park (L-000-000-045)

**Type:** Drug Administered

**Drug Name:** Methocarbamol-100mg-ml

**Drug Route:** IV

**Drug Dosage:** 20 milligrams

**Treated By:** John Araujo (P-000-014-846)

**Treatment Location:** Del Mar (L-000-000-040)

**Responsible Person:** Craig Lewis (P-000-006-069)

**Designated Owner:** Murrey Seidner (P-000-038-280)

**Time:** 10:19:00

**Date of Treatment:** 2025-08-29

**Files:** None

Okay

# Horseracing Integrity & Welfare Unit: Known Detection Times and Screening Limits of Common Controlled Medications



## Background:

Under HISA's Anti-Doping and Medication Control (ADMC) Program, it is the responsibility of attending veterinarians and Responsible Persons, i.e., trainers, to determine appropriate withdrawal guidance for a substance administered to a Covered Horse based on factors including, but not limited to, that individual horse's health and metabolism, other prescribed medications the horse may be receiving, a veterinarian's and/or trainer's risk aversion level, and published Detection Times.

The attached table should be consulted as a guide when determining appropriate withdrawal guidance for the medications listed.

Empty boxes indicate that there is not information available regarding dosing protocol, Detection Time, or Screening Limit for that specific substance.

All administrations of Controlled Medication Substances are prohibited within 48 hours of a race (restricted administration time), with the following exceptions as per HISA's ADMC Program Prohibited List. These substances may be administered  $\geq 24$  hours before a race or Vets' List workout:

- Orally administered vitamins
- Vaccines
- Anti-ulcer medications (e.g., Cimetidine, Omeprazole, and Ranitidine)
- Unsupplemented isotonic electrolyte solutions by oral or IV administration
- Altrenogest in female horses
- Antimicrobials (antibiotics) and other anti-infective agents, excluding procaine penicillin or other antimicrobial/anti-infective agents containing or metabolizing to Prohibited Substances
- Antiparasitic/anthelmintics approved and registered for use in horses, excluding levamisole or other antiparasitic/anthelmintics metabolizing to and/or containing other Prohibited Substances



# Horseracing Integrity & Welfare Unit:

## Known Detection Times and Screening Limits of Common Controlled Medications



### Terms To Know:

- **Banned Substance:** prohibited at all times from being possessed, administered, or present in relation to a Covered Horse.
- **Controlled Medication Substance:** permitted for use or administration in a Covered Horse, except in close proximity to a race or Vets' List workout. As specified in the Prohibited List, certain Controlled Medication Substances are also prohibited from being present in samples collected following an official timed workout.
- **Covered Horse:** a Thoroughbred that has completed at least one official timed workout.
- **Detection Time (DT):** the earliest time after administration of a medication to a group of test horses that the medication's concentration is below the Limit of Detection (i.e., the lowest concentration of a substance that can be identified by a laboratory) or defined Screening Limit in a specific matrix (e.g., serum, plasma, urine, or hair) in all of the test horses. The number of test horses used to determine a DT will be specified.
- **Prohibited List:** identifies Banned Substances/Methods and Controlled Medication Substances/Methods.
- **Responsible Person:** a Covered Horse's trainer; if the horse doesn't have a trainer, the Responsible Person is the Covered Horse's owner; included as a Covered Person.
- **Restricted Administration Time (RAT):** an interval prior to a race during which the administration of a substance, or substances, is strictly prohibited. RATs can be enforced by drug testing, as well as by surveillance or the acquisition of evidence that an administration occurred during the prohibited period.
- **Screening Limit (SL):** An internal trigger for laboratories. If initial testing finds a concentration of a substance in a sample from a Covered Horse that is below the SL, the laboratory will not pursue the possible presence of a Prohibited Substance. If initial testing finds a concentration of a substance to be above the SL, the laboratory will pursue confirmatory analysis to solidify the positive finding. An SL value can be but is not always a Limit of Detection.
- **Withdrawal Guidance:** a recommendation traditionally provided by regulators or veterinarians as to the minimum interval between administration of a medication, including specific dosage and route of administration, and a race or timed workout. Under HISA's ADMC Program, it is the responsibility of attending veterinarians and Responsible Persons, i.e., trainers, to determine appropriate withdrawal guidance for a substance administered to a Covered Horse. Such guidance will not be provided by HISA or HIWU.

\*Please be advised that the responsibilities and requirements set forth above are contained in the Anti-Doping and Medication Control (ADMC) Program regulations submitted by the Horseracing Integrity and Safety Authority to the Federal Trade Commission (FTC). These regulations were approved by the FTC on March 27, 2023. The information enclosed herein is not exhaustive, and more information can be found by consulting the approved regulations, which were posted to the Federal Register on January 26, 2023.

### Table Endnotes:

\*Number of test horses used in research studies to determine Detection Time.

1 Albuterol administered by any route other than inhalation is a Banned Substance. Evidence that albuterol was administered by a route other than inhalation, regardless of concentration in a sample, constitutes an Anti-Doping Rule Violation.

2 The detection of more than one NSAID in a horse's Post-Race or Post-Work blood sample constitutes a Stacking Violation (detection of more than 1 NSAID in a blood sample).

3 Three NSAIDs (Flunixin, Ketoprofen, Phenybutazone) are associated with DTs of 48 hours. Only one of the three may be administered using a withdrawal guidance based on the 48-hour DT. To avoid a Stacking Violation, the following secondary DTs should be applied for the following 3 NSAIDs: Flunixin: 144 hours; Ketoprofen 96 hours; Phenybutazone: 168 hours.

4 The detection of more than one corticosteroid in a horse's Post-Race or Post-Work blood sample constitutes a Stacking Violation.

# Horseracing Integrity & Welfare Unit:

## Known Detection Times and Screening Limits of Common Controlled Medications



Substance	Dosage	Detection Time <small>Unless Specified as Restricted Administration Time (RAT)(#Horses*)</small>	Screening Limit
Acepromazine	1. 0.15 mg/kg single oral dose 2. 0.05 mg/kg single IV dose (20 horses)	1. 72 hours (6) 2. 48 hours (20)	10 ng/mL as 2-(1- hydroxyethyl) promazine sulfoxide (HEPS) in urine or 0.02 ng/mL in serum or plasma
Albuterol <sup>1</sup> (Salbutamol)	5 x 100 µg actuations per dose for 2 days dosed every 4 hours	72 hours	0.5 ng/mL in urine
Betamethasone <sup>4</sup>			0.2 ng/mL in urine
Butorphanol	0.1 mg/kg single IV dose	72 hours (6)	1 ng/mL in urine or 0.01 ng/mL in serum or plasma
Cetirizine	0.4 mg/kg twice daily for 5 doses.	48 hours (9)	3 ng/mL in serum or plasma
Ciclesonide <sup>4</sup>	5.5 mg/day x 5 days, then 4.1 mg/day x 5 days via inhalation (Aservo Equihaler).	48 hours (6)	
Cimetidine	20 mg/kg orally twice daily for a total of 7 doses	RAT: 24 hours (9)	400 ng/mL in serum or plasma
Dantrolene	500 mg orally once daily for 3 days	48 hours (12)	3 ng/mL of 5-hydroxydantrolene in unhydrolyzed urine or 0.1 ng/mL in serum or plasma as 3-hydroxydantrolene
Detomidine	0.02 mg/kg single IV dose	48 hours (10)	2 ng/mL 3-carboxydetomidine in urine or 0.02 ng/mL in serum or plasma
Dexamethasone <sup>4</sup>	Single 20 mg IV, IM, or oral dose	72 hours (20)	0.2 ng/mL in urine
Dexamethasone Sodium phosphate <sup>4</sup>	0.06 mg/kg single IV dose	72 hours (6)	
Diclofenac <sup>2</sup>			50 ng/mL in urine
Dipyrrone <sup>2</sup>	30 mg/kg single IV dose	72 hours (10)	1,000 ng/mL of 4-methylaminoantipyrrine in urine
Firocoxib <sup>2</sup>	100 mcg/kg orally once daily for total of 7 doses	360 hours (20)	2 ng/mL in serum or plasma
Flunixin <sup>2,3</sup>	1. 1.1 mg/kg single IV dose 2. 500 mg single IV dose	1. 48 hours (16) 1. 48 hours (12)	4 ng/mL in serum or plasma
Furosemide		RAT: 48 hours (6)	50 ng/mL in urine or 0.1 ng/mL in serum or plasma
Furosemide (where permitted by exemption)	1 mg/kg single IV dose	RAT: 4 hours	100 ng/mL in serum or plasma AND urine; specific gravity < 1.010

# Horseracing Integrity & Welfare Unit:

## Known Detection Times and Screening Limits of Common Controlled Medications



Substance	Dosage	Detection Time <small>Unless Specified as Restricted Administration Time (RAT)(#Horses*)</small>	Screening Limit
Glycopyrrolate	1 mg single dose IV	48 hours (20)	0.003 ng/mL in serum or plasma
Guaifenesin (glycerol guaiacolate)	2 grams total body dose, orally twice daily for 5 doses	48 hours (9)	1 ng/mL in serum or plasma
Hydroxyzine	190 mg twice daily for a total of 9 doses	96 hours (2)	
Ipratropium	5.5 mcg/kg once daily via nebulization for 3 total doses	120 hours (6)	0.25 ng/mL in urine
Isoflupredone <sup>4</sup>		Serum concentrations associated with an experimental dose of 8 mg IA single joint (6 horses) were all below Limit of Detection by 14 days	
Ketoprofen <sup>2,3</sup>	2.2 mg/kg single IV dose	48 hours (24)	2 ng/mL in serum or plasma
Lidocaine	200 mg of lidocaine, as lidocaine hydrochloride, administered subcutaneously	48 hours (6)	10 ng/mL as 3-hydroxylidocaine in urine or 0.02 ng/mL as 3-hydroxylidocaine in serum or plasma
Medetomidine			5 ng/mL as 3-hydroxymedetomidine in urine or 0.02 ng/mL as 3-hydroxymedetomidine in serum or plasma
Mepivacaine	40 mg (2 mL) single dose SQ distal limb	72 hours (6)	10 ng/mL as 3-hydroxymepivacaine in urine or 0.05 ng/mL in serum or plasma
Methocarbamol	15 mg/kg single IV dose	48 hours (20)	1 ng/mL in serum or plasma
Misoprostol	5 mcg/kg orally twice daily for 14 days		
N-Butylscopolammonium	0.3 mg/kg single IV dose	48 hours (6)	25 ng/mL in urine or 0.05 ng/mL in serum or plasma
Omeprazole	2.2 g orally once daily for 4 doses	RAT: 24 hours (9)	10 ng/mL in serum or plasma as omeprazole sulfide
Phenylbutazone <sup>2,3</sup>	4.4 mg/kg single IV dose	48 hours (17)	0.2 mcg/mL in serum or plasma
Procaine	17 mg (~17,000 IU) per kg IM	48 hours	25 ng/mL in serum or plasma
Ranitidine	8 mg/kg orally twice daily for 7 doses	RAT: 24 hours (9)	40 ng/mL in serum or plasma
Romifidine	80 mcg/kg single IV dose	60 hours (6)	1 ng/mL in urine
Triamcinolone <sup>4</sup>			0.5 ng/mL in urine
Xylazine	200 mg single IV dose	72 hours (6)	10 ng/mL in urine (as 4-hydroxylazine) or 0.05 ng/mL in serum or plasma

**TAB 18**

## Christy Heath

---

**From:** Larry Lewis <ldlewis.law@gmail.com>  
**Sent:** Thursday, November 6, 2025 2:09 PM  
**To:** Christy Heath  
**Subject:** EMC Charge of Controlled Medication Rule Violation; Covered Horse; Kikuride; Sample #B200035796  
**Attachments:** 2853.pdf; 2851.pdf

Dear Counsel,

I have attached hereto via email a copy of my letter dated November 6, 2025, addressed to you on behalf of trainer Craig Lewis, in which he, among other things, unequivocally denies generally and specifically any medication violation on his part and requests a hearing. My attached letter is also accompanied by a copy of a Declaration of John P. Araujo, DMV, the veterinarian that intravenously administered the methocarbamol on the August 29, 2025, forty-eight hours in advance of the Kikuride's race on August 31, 2025, in the exact same amount, with the same timing, namely, forty-eight hours in advance, on all of Kikuride's previous four career races.

Please advise me that you have received my attached letter dated November 6, 2025, together with the Declaration of John P. Araujo, DMV, dated November 3, 2025, upon your receipt of the same. Thank you for your anticipated courtesy and cooperation.

--

Lawrence D. Lewis, Esq.  
6444 E Spring St., #303  
Long Beach, CA 90815  
[ldlewis.law@gmail.com](mailto:ldlewis.law@gmail.com)  
562-858-8444

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**DECLARATION OF JOHN P. ARAUJO, DVM**

I, JOHN P. ARAUJO, declare:

1. I am now, and have been since July 7, 1977, a licensed veterinarian in the State of California, with the license number of 38270. I presently reside in Arcadia, California and operate under the name of John P. Araujo, DVM, A Professional Corporation. I specialize in providing veterinarian services for equine healthcare. I have dedicated myself to the care of horses in the local community by striving to keep horses healthy and thriving, particularly thoroughbred racehorses. I have personal knowledge of the facts stated in this Declaration and, if called to testify, I could and would testify competently under oath to these facts.

2. I can be reached at (626) 893-7612 (cell), or (626) 355-2924 (landline), with the email address of: jpadvm@gmail.com or subtrainer@sbcglobal.net.

3. I serve as the primary veterinarian to many thoroughbred horse trainers at both Santa Anita Racetrack and Del Mar Racetrack, as well as at other locations. One of the many trainers that I work for at these racetracks is Craig Lewis. I have worked with Mr. Lewis for some forty (40) years. I have served as his primary veterinarian and have treated some six thousand (6,000) thoroughbred horses trained by him during this time. And during this time, I have treated more than one thousand (1,000) thoroughbred racehorses trained by him with the same drug, methocarbamol, in the exact same manner by injecting them intravenously with least forty-eight (48) hours in advance of a scheduled race. One such horse trained by Craig Lewis that I have routinely treated throughout her five (5) race career is Kikuride, a chestnut filly, foaled in 2022, by the stallion, Clubhouse Ride, out of the broodmare, Kiama.

4. I have treated Kikuride in advance of all of her five (5) career races with, among all legal therapies, an intravenous injection of methocarbamol<sup>1</sup> with the same exact milligrams at least forty-eight (48) hours in advance of each of Kikuride's next scheduled

<sup>1</sup> Methocarbamol, sold under the brand name Robaxin, is not designed to enhance performance. Rather, it is prescribed as a muscle relaxant used to treat muscle spasms, slowing down nerve activity to allow the body to relax.

1 race. Specifically, I provided intravenous injections of methocarbamol at least forty-eight  
2 (48) hours of each of Kikuride's five career races on (i) April 5, 2025, (ii) April 25, 2025,  
3 (iii) May 18, 2025, (iv) July 31, 2025, and (v) August 31, 2025. I followed the exact same  
4 process in each of these five (5) instances, injecting intravenously Kikuride at least forty-  
5 eight (48) hours in advance in each of the five (5) enumerated races with the exact same  
6 milligrams of methocarbamol.

7       5. Of course, the Horseracing Integrity and Safety Authority ("HISA"), through its  
8 Anti-Doping and Medication Control ("ADMC") program, enforced by the Horseracing  
9 Integrity & Welfare Unit ("HIWU"), strictly limits any intravenous injections of  
10 thoroughbred racehorses to strictly veterinarians or the strict supervision by a veterinarian,  
11 of a veterinarian technician, in the absence of a medical emergency. It is illegal for anyone  
12 else, including a trainer such as Craig Lewis, to even administer any intravenous or other  
13 injections whatsoever to a thoroughbred racehorse.

14       6. In anticipation of Kikuride's scheduled race on August 31, 2025, I followed the  
15 exact same procedure that I always followed, namely, at least forty-eight (48) hours in  
16 advance of the race on August 31, 2025, I administered an intravenous injection of the exact  
17 precise amount of methocarbamol in Kikuride, as I had done the four (4) previous occasions,  
18 before each of her races on (i) April 5, 2025, (ii) April 25, 2025, (iii) May 18, 2025, (iv)  
19 July 31, 2025, and (v) August 31, 2025. As usual, and on August 31, 2025, I had absolute  
20 total control over the intravenous injection that I administered to Kikuride as Craig Lewis  
21 had absolutely no control whatsoever concerning that injection. It was, and is, my intent  
22 and practice to always fully comply with all regulations and rules concerning the timing and  
23 the amount of methocarbamol administered, exactly as I have done on the previous four (4)  
24 career races of Kikuride and over one thousand (1,000) thoroughbred horses for Craig Lewis.  
25 To my knowledge, I intended to, and believe I did, comply fully with all regulations and  
26 rules of HISA, HIWU and the ADMC program.

27       7. When I learned of the alleged Class C post-race violation involving Kikuride  
28 after her last race on August 31, 2025, it made no sense to me whatsoever. I treated Kikuride

1 forty-eight (48) hours in advance of August 31, 2025, with the same amount of  
2 methocarbamol as I did on the four (4) other previous career races for Kikuride. I have  
3 attached hereto as Exhibits A, B, C and D, respectfully, the four (4) previous reports that I  
4 prepared and submitted to HIWU on the four (4) previous races, before the August 31, 2025,  
5 race of Kikuride. There have never been any alleged post-race violations of the four (4)  
6 career races of Kikuride or more than one thousand (1,000) thoroughbred horses trained by  
7 Craig Lewis with the exact same treatment. I am totally unaware why the fifth career race  
8 on August 31, 2025, of Kikuride would be any different than her four (4) previous races. It  
9 makes absolutely no sense to me.

10 8. I received a copy of a certain letter dated November 3, 2025 from HIWU to  
11 Lawrence Lewis, counsel for trainer, Craig Lewis, concerning Craig Lewis' request for an  
12 analysis of Kikuride's B Sample. Apparently, the Equine Integrity Anti-Doping Sciences  
13 Laboratory ("EQIAS") in Lexington, Kentucky confirmed Kikuride's B Sample contains  
14 methocarbamol. I can only reiterate, because of the facts recited herein, I cannot understand  
15 this conclusion.

16 I declare under the penalty of perjury under the laws of the State of California that  
17 the foregoing is true and correct and that this Declaration was executed on this \_\_\_\_\_ day  
18 of November, 2025, in Arcadia, California.

19  
20 By: \_\_\_\_\_  
21 John P. Araujo, DVM  
22  
23  
24  
25  
26  
27  
28

**DECLARATION OF JOHN P. ARAUJO, DVM**

I, JOHN P. ARAUJO, declare.

1  
2  
3 1. I am now, and have been since July 7, 1977, a licensed veterinarian in the State  
4 of California, with the license number of 38270<sup>6361</sup> I presently reside in Arcadia, California  
5 and operate under the name of John P. Araujo, DVM, A Professional Corporation. I  
6 specialize in providing veterinarian services for equine healthcare. I have dedicated myself  
7 to the care of horses in the local community by striving to keep horses healthy and thriving,  
8 particularly thoroughbred racehorses. I have personal knowledge of the facts stated in this  
9 Declaration and, if called to testify, I could and would testify competently under oath to  
10 these facts.

11 2. I can be reached at (626) 893-7612 (cell), or (626) 355-2924 (landline), with the  
12 email address of: jpadvm@gmail.com or subtrainer@sbcglobal.net.

13 3. I serve as the primary veterinarian to many thoroughbred horse trainers at both  
14 Santa Anita Racetrack and Del Mar Racetrack, as well as at other locations. One of the many  
15 trainers that I work for at these racetracks is Craig Lewis. I have worked with Mr. Lewis for  
16 some forty (40) years. I have served as his primary veterinarian and have treated some six  
17 thousand (6,000) thoroughbred horses trained by him during this time. And during this time,  
18 I have treated more than one thousand (1,000) thoroughbred racehorses trained by him with  
19 the same drug, methocarbamol, in the exact same manner by injecting them intravenously  
20 with least forty-eight (48) hours in advance of a scheduled race. One such horse trained by  
21 Craig Lewis that I have routinely treated throughout her five (5) race career is Kikuride, a  
22 chestnut filly, foaled in 2022, by the stallion, Clubhouse Ride, out of the broodmare, Kiama

23 4. I have treated Kikuride in advance of all of her five (5) career races with, among  
24 all legal therapies, an intravenous injection of methocarbamol<sup>1</sup> with the same exact  
25 milligrams at least forty-eight (48) hours in advance of each of Kikuride's next scheduled  
26

27  
28 <sup>1</sup> Methocarbamol, sold under the brand name Robaxin, is not designed to enhance performance. Rather, it is prescribed as a muscle relaxant used to treat muscle spasms, slowing down nerve activity to allow the body to relax.

1 race. Specifically, I provided intravenous injections of methocarbamol at least forty-eight  
2 (48) hours of each of Kikuride's five career races on (i) April 5, 2025, (ii) April 25, 2025,  
3 (iii) May 18, 2025, (iv) July 31, 2025, and (v) August 31, 2025. I followed the exact same  
4 process in each of these five (5) instances, injecting intravenously Kikuride at least forty-  
5 eight (48) hours in advance in each of the five (5) enumerated races with the exact same  
6 milligrams of methocarbamol.

7 5. Of course, the Horseracing Integrity and Safety Authority ("HISA"), through its  
8 Anti-Doping and Medication Control ("ADMC") program, enforced by the Horseracing  
9 Integrity & Welfare Unit ("HIWU"), strictly limits any intravenous injections of  
10 thoroughbred racehorses to strictly veterinarians or the strict supervision by a veterinarian,  
11 of a veterinarian technician, in the absence of a medical emergency. It is illegal for anyone  
12 else, including a trainer such as Craig Lewis, to even administer any intravenous or other  
13 injections whatsoever to a thoroughbred racehorse.

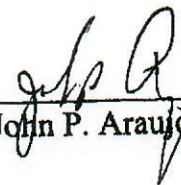
14 6. In anticipation of Kikuride's scheduled race on August 31, 2025, I followed the  
15 exact same procedure that I always followed, namely, at least forty-eight (48) hours in  
16 advance of the race on August 31, 2025, I administered an intravenous injection of the exact  
17 precise amount of methocarbamol in Kikuride, as I had done the four (4) previous occasions,  
18 before each of her races on (i) April 5, 2025, (ii) April 25, 2025, (iii) May 18, 2025, (iv)  
19 July 31, 2025, and (v) August 31, 2025. As usual, and on August 31, 2025, I had absolute  
20 total control over the intravenous injection that I administered to Kikuride as Craig Lewis  
21 had absolutely no control whatsoever concerning that injection. It was, and is, my intent  
22 and practice to always fully comply with all regulations and rules concerning the timing and  
23 the amount of methocarbamol administered, exactly as I have done on the previous four (4)  
24 career races of Kikuride and over one thousand (1,000) thoroughbred horses for Craig Lewis.  
25 To my knowledge, I intended to, and believe I did, comply fully with all regulations and  
26 rules of HISA, HIWU and the ADMC program.

27 7. When I learned of the alleged Class C post-race violation involving Kikuride  
28 after her last race on August 31, 2025, it made no sense to me whatsoever. I treated Kikuride

1 forty-eight (48) hours in advance of August 31, 2025, with the same amount of  
 2 methocarbamol as I did on the four (4) other previous career races for Kikuride. I have  
 3 attached hereto as Exhibits A, B, C and D, respectfully, the four (4) previous reports that I  
 4 prepared and submitted to HIWU on the four (4) previous races, before the August 31, 2025,  
 5 race of Kikuride. There have never been any alleged post-race violations of the four (4)  
 6 career races of Kikuride or more than one thousand (1,000) thoroughbred horses trained by  
 7 Craig Lewis with the exact same treatment. I am totally unaware why the fifth career race  
 8 on August 31, 2025, of Kikuride would be any different than her four (4) previous races. It  
 9 makes absolutely no sense to me.

10 8. I received a copy of a certain letter dated November 3, 2025 from HIWU to  
 11 Lawrence Lewis, counsel for trainer, Craig Lewis, concerning Craig Lewis' request for an  
 12 analysis of Kikuride's B Sample. Apparently, the Equine Integrity Anti-Doping Sciences  
 13 Laboratory ("EQIAS") in Lexington, Kentucky confirmed Kikuride's B Sample contains  
 14 methocarbamol. I can only reiterate, because of the facts recited herein, I cannot understand  
 15 this conclusion.

16 I declare under the penalty of perjury under the laws of the State of California that  
 17 the foregoing is true and correct and that this Declaration was executed on this 3 day  
 18 of November, 2025, in Arcadia, California

19  
 20 By:   
 21 John P. Araujo, DVM

22  
 23  
 24  
 25  
 26  
 27  
 28

**EXHIBIT A**

# View Treatment

« Past Treatment Edit Treatment

You can only view the treatment

Date

04/13/2025



Time Zone

Pacific Time

Time Administered

05

19

Search for

Stable

Training Center

Farm

Medical Facility

Location

Santa Anita Park - 285 W Huntington Dr, Arcadia, CA, 91007

Search by Horse Group

**This is an individual treatment. To dispense medication to multiple horses at one time, change this treatment to a group treatment.**

Breed Type

Thoroughbred

Quarter Horse

Mixed

Search By

Horse

Team

Horse

Kikukude - 2022 Chestnut Filly Clubhouse Ride out of Klamath

PUBLIC

Trainer

Owner

Trainer / Client

Lewis, Craig Anthony

Treatment Performed By

John Arrajo (Veterinarian)



This treatment was performed by another person.

Treatment Performed By

Examination/Diagnosis Notes

1/500

Medications Procedures Favorites Dispensed IA Treatment

Drug

Search by/ Drug Name

Dose





Unit

Route

Add Medication to Favorites.

Save Medication

PUBLIC

Drug	Dose	Unit	Route	A. 05
<del>Vitamin B Complex - Vitamin B Complex - 150mg-ml</del>	<del>500</del>	<del>grams</del>	<del>Intravenous</del>	
Omeprazole Concentration - Omeprazole Syrup - 2.28gr-gr	1	grams	Oral	
Methocarbamol - Methocarbamol - 100mg-ml	20	milligrams	Intravenous	
Phenylbutazone - Bute - 200mg-ml	10	milligrams	Intravenous	
4 total				

**EXHIBIT B**

# View Treatment

Yellow / Chart  
View Case Activity

« Past Treatment

Edit Treatment

You can only view the treatment

Date

04 / 3 / 2025

Time Administered

Time Zone  
Pacific Time

08 : 22

Search for

Age Track

Training Center

Farm

Medical Facility

Location

San Anita Park - 285 W Huntington Dr, Arcadia, CA, 91007

Search by Horse Group

This is an individual treatment. To dispense medication to multiple horses at one time, change this treatment to a group treatment.

Breed Type

Thoroughbred

Quarter Horse

Mixed

Search By

Horse

Dam

Route

Select route

Horse

Kikuride - 2022 Chestnut Filly Clubhouse Ride out of Kiama

Give Medication

**EXHIBIT C**

# View Treatment

« Past Treatment

Edit Treatment

You can only view the treatment

Date

05/15/2025

Time Zone

Pacific Time

Time Administered

06

: 05

Search for

Stable

Training Center

Farm

Medical Facility

Location

San Anita Park - 285 W Huntington Dr, Arcadia, CA, 91007

Single Horse Group

**ⓘ** This is an individual treatment. To dispense medication to multiple horses at one time, change this treatment to a group treatment.

Breed Type

Thoroughbred

Quarter Horse

Mixed

Search By

Horse

Dam

Horse

Kiki ride - 2022 Chestnut Filly Clubhouse Ride out of Kiama

SAVE INFORMATION

### View Treatment

« Past Treatment

Edit Treatment

You can only view the treatment

Date 07/19/2025



Time Zone Pacific Time

Time Administered

09

02

Search for

Ice Track

Training Center

Farm

Medical Facility

Location

Del Mar - 2260 Jimmy Durante Blvd, Del Mar, CA, 92014

Group

This is an individual treatment. To dispense medication to multiple horses at one time, change this treatment to a group treatment.

Breed Type

Thoroughbred

Quarter Horse

Mixed

Search By

Horse

Dam

Horse

Kikilride - 2022 Chestnut Filly Clubhouse Ride out of Kiama

**Lawrence D. Lewis, Esq.**  
6444 East Spring Street, #303  
Long Beach, California 90815  
Telephone: (562) 858-4448  
Email: [ldlewis.law@gmail.com](mailto:ldlewis.law@gmail.com)

---

**VIA EMAIL**

November 6, 2025

Christy Health, Esq.  
Litigation Counsel  
Horsing Integrity & Welfare Unit  
4801 Main Street, Suite 350  
Kansas City, MO 64112-2749  
Email: [chealth@hiwu.org](mailto:chealth@hiwu.org)

Re: EMC Charge of Controlled Medication Rule Violation  
Covered Horse: Kikuride  
Sample #B200035796

Dear Counsel:

This response is on behalf of Craig Lewis, who has been a licensed thoroughbred horse trainer since 1981. In accordance with your letter dated November 3, 2025, Trainer Craig Lewis, as a Covered Person under the Anti-Doping Medication Control (“ADMC”) Program, hereby denies generally and specifically the alleged Controlled Medication Violation Rule and disputes generally and specifically the proposed Consequences as to him. In almost forty-five (45) years of training, Mr. Lewis has never had a purse taken away nor has he ever been suspended for any violation. Accordingly, Craig Lewis also hereby requests a hearing in accordance with ADMC Program Rule 3361 of the Protocol and the Arbitration Procedures. Presumably, the hearing will take place in California.

As you are aware, I previously communicated with you concerning your letter dated September 24, 2025, directed to Craig Lewis, in which you advised of the Equine Controlled Medication (“ECM”) Notice Letter pursuant to ADMC Program Rule 3345 of the Protocol. Subsequently, I communicated with John P. Araujo, DVM, who has been the Veterinarian of Craig Lewis for several years (approximately 40 years) and has exclusively treated the horse, Kikuride, with methocarbamol in each and every of her four career races prior to August 31, 2025, as well as her fifth race on August 31, 2025. He stated that he followed the same exact procedure with the exact amount of methocarbamol on all five occasions including the race of August 31, 2025. In that regard, I have attached hereto a Declaration, signed by Dr. Araujo on November 3, 2025, which elaborates on the foregoing in detail.

In our conversation, you reiterated that pursuant to the language contained in ADMC Program Rule 3040(b)(6), there is strict liability for all Covered Persons, as defined. Of course, strict liability is not the same as absolute liability. ADMC Program Rule 3121 describes the burden and standard of proof to demonstrate a Controlled Medication Violation of the Protocol (Rule 3000 *et al*) [Equine Anti-Doping Controlled Medication Protocol]. Among other things, the standard of proof in all cases is greater than a mere balance of probability but less than clear and convincing evidence or proof beyond reasonable doubt.

PUBLIC

Lawrence D. Lewis, Esq.  
8444 East Spring Street, #303  
Long Beach, California 90815  
Telephone: (562) 858-4448  
Email: ldlewis.law@gmail.com

Christy Health, Esq.  
November 6, 2025  
Page 2

Here, the Protocol places the burden of proof, under Rule 3121(b), on the Covered Person, namely, trainer Craig Lewis. Here, under California Horse Racing Board Rule 1890 (“Possession of Contraband”), only licensed veterinarians, registered veterinary technicians (RVT) or licensed veterinarian’s assistants are permitted to possess:

- drugs or medications prepared by injection by a hypodermic syringe or needle; or
- hypodermic syringes, needles, or similar instruments used for injections.

A trainer, as a Covered Person, is precluded from possessing or using hypodermic needles, etc. Indeed, the penalties for any such violation can be enormous. Please note that neither Craig Lewis nor his staff ever provide any medication whatsoever, whether oral or otherwise, for any of his horses that have been entered in a race.

In this case, Craig Lewis is, therefore, barred from injecting Kikuride with methocarbamol. Thus, he submits that he had no involvement with the injection of methocarbamol into Kikuride on August 29, 2025, or prior to her race on August 31, 2025. As a result, he hereby requests that the purported violation asserted against him be dismissed in this matter with prejudice.

Respectfully submitted,

By: Lawrence D Lewis  
Lawrence D. Lewis

**TAB 19**

## Christy Heath

---

**From:** IAP JK <iap2025jk@aol.com>  
**Sent:** Thursday, February 12, 2026 2:12 PM  
**To:** Larry Lewis; Christy Heath  
**Subject:** Re: HIWU v. Lewis; In the Matter of ECM 2025-250

Mr. Lewis, Ms. Heath,

After careful consideration, the request for Reconsideration to Obtain a DNA sample is denied.

We will proceed with the scheduled Hearing February 17, 2026, at 11:00 a.m. Mountain Time.

Regards,  
Julie Kagno

On Wednesday, February 4, 2026 at 04:11:43 PM MST, Larry Lewis <ldlewis.law@gmail.com> wrote:

Dear Your Honor and Litigation Counsel,

The primary mission and objective of HISA/HIWU should be to ascertain the truth. It is beyond me, and most law-abiding citizens, as to why HISA/HIWU is not interested in the truth. HISA/HIWU apparently desires to win at any cost, without any consideration for its purported targets or for the truth. HISA/HIWU apparently seeks pre-ordained results orchestrated by HISA/HIWU.

On Wed, Feb 4, 2026 at 2:36 PM IAP JK <[iap2025jk@aol.com](mailto:iap2025jk@aol.com)> wrote:

Ms. Heath and Mr. Lewis,

Your documents have been received for review.

Regards,  
Julie Kagno

On Wednesday, February 4, 2026 at 09:10:44 AM MST, Christy Heath <[cheath@hiwu.org](mailto:cheath@hiwu.org)> wrote:

Ms. Kagno and Mr. Lewis,

Good morning. In response to Trainer Lewis' renewed Motion for Reconsideration, please find attached HIWU's Motion to Strike. I will upload the attached document to Box.com shortly.

Thank you.

V/r,

Christy Heath, Esquire | Litigation Counsel

**Horseracing Integrity & Welfare Unit**

**Drug Free Sport International**

C: (816) 814-4713

E: [cheath@hiwu.org](mailto:cheath@hiwu.org)

---

**From:** Larry Lewis <[ldlewis.law@gmail.com](mailto:ldlewis.law@gmail.com)>  
**Sent:** Tuesday, February 3, 2026 2:20 PM  
**To:** [jap2025jk@aol.com](mailto:jap2025jk@aol.com); Christy Heath <[cheath@hiwu.org](mailto:cheath@hiwu.org)>  
**Subject:** HIWU v. Lewis; In the Matter of ECM 2025-250

Dear Your Honor and Litigation Counsel,

In connection with the above-referenced matter, I am filing today a Notice of Motion and Motion of Trainer Craig A. Lewis for Reconsideration of the Denial of his Previous Request to Obtain a DNA Sample; and Request for a Stay. Thank you.

--

Lawrence D. Lewis, Esq.

6444 E Spring St., #303

Long Beach, CA 90815

[ldlewis.law@gmail.com](mailto:ldlewis.law@gmail.com)

562-858-8444

This email message from HIWU may contain confidential information and is intended only for the use of the addressee(s) named herein. If you are not an addressee, or the person responsible for delivering this to an addressee, you are hereby notified that reading, disclosing, copying, and distributing this message are prohibited. If you have received this email message in error, please notify us immediately by replying to the sender and take the steps necessary to delete the message completely from your system.

--

Lawrence D. Lewis, Esq.  
6444 E Spring St., #303  
Long Beach, CA 90815  
[ldlewis.law@gmail.com](mailto:ldlewis.law@gmail.com)  
562-858-8444

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**TAB 20**

## Christy Heath

---

**From:** IAP JK <iap2025jk@aol.com>  
**Sent:** Friday, December 5, 2025 9:07 PM  
**To:** Christy Heath; Larry Lewis  
**Cc:** Monica Pilarski; Kathryn Crouse  
**Subject:** Re: Notice of Motion and Motion of Trainer Craig Lewis To Obtain A DNA Sample  
**Attachments:** IAP Ruling 2025-250 HIWU v Lewis - Motion to Obtain DNA.pdf

Ms. Heath, Mr. Lewis,

Mr. Lewis' request to reply to HIWU's opposition reply is denied.

Attached is IAP Ruling 2025-250 HIWU v Lewis, denying the Motion to Obtain DNA Sample.

Regards,  
Julie Kagno

On Wednesday, December 3, 2025 at 11:12:28 AM MST, Larry Lewis <ldlewis.law@gmail.com> wrote:

Your Honor,

It is quite difficult for me to understand why HISU is not interested in fairness, due process or justice. All courts in the country would allow us to file a Reply. Thank you for your consideration.

Lawrence D. Lewis  
6444 E. Spring St., #303  
Long Beach, CA 90815  
(562) 858-4448

On Dec 3, 2025, at 9:06 AM, Christy Heath <cheath@hiwu.org> wrote:

Ms. Lewis,

HIWU objects to Trainer Lewis' request to provide a reply or rebuttal response to HIWU's Response to his Motion to Obtain DNA Sample analysis.

Allowing Trainer Lewis to submit a reply to HIWU's Response would not be aligned with the spirit of the rules outlined by ADMC Program Rule 7180, which states that after each party has submitted their pre-hearing submission: "**There shall be no reply pre-hearing submission** unless ordered otherwise by the IAP Member."

Moreover, ADMC Program Rule 7180 holds that “**all matters before the IAP member(s) shall proceed expeditiously.**” Permitting Trainer Lewis to volley a response back to HIWU’s response to his motion would not be proceeding expeditiously—something HISA implores IAP members and the parties to be mindful of several times throughout its Arbitration Rules. *See* Rules 7080, 7180, 7190, and 7260.

For that reason, HIWU objects to Trainer Lewis’ request. If you decide to grant Trainer Lewis’ request, HIWU requests, out of fairness, to reserve its right to respond in kind.

V/r,

Christy Heath, Esquire | Litigation Counsel

**Horseracing Integrity & Welfare Unit**

**Drug Free Sport International**

C: (816) 814-4713

E: [cheath@hiwu.org](mailto:cheath@hiwu.org)

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**From:** Larry Lewis <ldlewis.law@gmail.com>  
**Sent:** Wednesday, December 3, 2025 11:33 AM  
**To:** iap2025jk@aol.com  
**Cc:** Christy Heath <cheath@hiwu.org>  
**Subject:** Re: Notice of Motion and Motion of Trainer Craig Lewis To Obtain A DNA Sample

Your Honor (Judge Julie Kagno):

Today, Trainer Craig Lewis has received the HIWU's Response to Trainer Lewis's Motion to Obtain DNA Sample ("Opposition"). Mr. Lewis respectfully requests the opportunity to file his Reply to HIWU's Opposition. He respectfully requests that the Reply may be submitted by December 9, 2025. Thank you.

**TAB 21**

## Christy Heath

---

**From:** Larry Lewis <ldlewis.law@gmail.com>  
**Sent:** Friday, December 5, 2025 11:24 PM  
**To:** iap2025jk@aol.com  
**Cc:** Christy Heath  
**Subject:** Trainer Lewis's Motion for Reconsideration of the IAP's Denial of His Ability to File a Reply to HIWU's Response to Motion to Obtain DNA Sample  
**Attachments:** 2912.pdf

Your Honor,

I am respectfully submitting a Motion for Reconsideration of the IAP's Denial of Trainer Lewis's Ability to File a Reply to HIWU's Response to Motion to Obtain DNA Sample ("Trainer Lewis's Motion"). Trainer Lewis's Motion is attached hereto. Thank you.

--

Lawrence D. Lewis, Esq.  
6444 E Spring St., #303  
Long Beach, CA 90815  
[ldlewis.law@gmail.com](mailto:ldlewis.law@gmail.com)  
562-858-8444

**TAB 22**

## Christy Heath

---

**From:** Christy Heath  
**Sent:** Monday, December 8, 2025 8:24 AM  
**To:** 'Larry Lewis'  
**Cc:** iap2025jk@aol.com; Monica Pilarski; Kathryn Crouse  
**Subject:** RE: Trainer Craig Lewis's Motion for Reconsideration

Mr. Lewis,

In response to your email and for clarification, HIWU did not contend Kikuride never participated in Post-Race testing prior to August 31. Paragraph 13 of HIWU's response acknowledged Kikuride was selected to complete Post-Race testing after one of the four races she competed in prior to August 31:

"Trainer Lewis argues he 'has doubts' that the Methocarbamol detected in Kikuride's Sample was over the limit because Kikuride was on the same Methocarbamol dosing schedule during four of her earlier races and none resulted in Adverse Analytical Findings. That argument falls flat when considering that Kikuride was only selected for Post-Race testing after one of those races. The absence of a Post-Race Adverse Analytical Finding does not prove the Methocarbamol dosing schedule was safe for Kikuride or that Kikuride's system did not contain an excess of Methocarbamol during the three races for which she was not selected to complete Post-Race Testing. In any case, even if all of the races had resulted in no Adverse Analytical Findings, Trainer Lewis is nevertheless strictly liable for the presence of Methocarbamol in Kikuride's Post-Race Sample on August 31, 2025."

I hope this better helps orient you to HIWU's argument/position.

V/r,

Christy Heath, Esquire | Litigation Counsel Horseracing Integrity & Welfare Unit Drug Free Sport International  
C: (816) 814-4713  
E: cheath@hiwu.org

-----Original Message-----

From: Larry Lewis <ldlewis.law@gmail.com>  
Sent: Sunday, December 7, 2025 6:26 PM  
To: iap2025jk@aol.com  
Cc: Christy Heath <cheath@hiwu.org>  
Subject: Trainer Craig Lewis's Motion for Reconsideration

Your Honor,

I make this submittal to supplement Trainer Craig Lewis's Motion for Reconsideration, filed in the evening of December 5, 2025.

It has been my long held understanding that the winner in each horse is tested, especially at tracks such as Santa Anita Race Track. In HIWU's Response to Trainer Craig Lewis's Motion for DNA Sample, HIWU, without any supporting evidence, contended that Kikuride had only been tested on August 31, 2025, and not in any of her previous races. The IAP adopted this contention is denying Trainer Lewis's request to file a Reply to HIWU's Response.

The record is unequivocally clear that Kikuride had won a race prior to August 31, 2025. She won at Santa Anita on April 25, 2025. As such, I must question the statement HIWU's Response contending that Kikuride has never been tested prior to August 31, 2025, and if inaccurate, the reliance thereupon by IAP. Thank you.

Lawrence D. Lewis  
6444 E. Spring St., #303  
Long Beach, CA 90815  
(562) 858-4448

PUBLIC

**TAB 23**



**NOTICE OF FINAL CIVIL SANCTIONS UNDER THE ADMC PROGRAM**

March 4, 2026

**SENT VIA EMAIL [craiglewisracing@gmail.com](mailto:craiglewisracing@gmail.com)**

Craig Lewis  
2051 Gardi St.  
Bradbury, CA 91008  
(818) 731-7373

**Re: *ECM2025-250/ECM Charge of Controlled Medication Rule Violations – Rule 3312  
Covered Horses: Kikuride***

This serves as notice to you, Craig Lewis, that the Horseracing Integrity & Welfare Unit (“HIWU”) is imposing the following Consequences against you pursuant to the attached Final Decision of the Internal Adjudication Panel and under the Anti-Doping and Medication Control (“ADMC”) Program pursuant to 15 U.S.C. 3057(d):

1. Disqualification of the results of Kikuride obtained in Race 11 at Del Mar Racetrack in Del Mar, California on August 31, 2025, and forfeiture of all purses and other compensation, prizes, trophies, points, and rankings and repayment or surrender (as applicable) to the Race Organizer pursuant to ADMC Program Rule 3321;
2. A fine of \$500, in accordance with ADMC Program Rule 3323;
3. Assignment of 1.5 Penalty Points (ADMC Program Rule 3328); and
4. Public Disclosure in accordance with ADMC Program Rules 3620 and 3331.

This matter involved the presence of a Controlled Medication Substance and/or its Metabolites or Markers (ADMC Program Rule 3312) in a Post-Race/Vet’s List Sample – Methocarbamol (Class C). The Controlled Medication Substance was found to be present in a blood Sample collected from Kikuride after Race 11 at Del Mar Racetrack in Del Mar, California on August 31, 2025.

Review of a Final Decision and its accompanying Consequences by a federal Administrative Law Judge is available under 15 U.S.C. 3058. You will also receive a copy of the notice to the Federal Trade Commission (“FTC”) of these civil sanctions. **Pursuant to 15 U.S.C. 3058(b)(1), review of the decision must be requested within thirty (30) days of HISA’s notice to the FTC.** A stay of the Consequences set forth above will only be imposed if such a stay is requested from, and approved by, the applicable Administrative Law Judge.



The Consequences set forth above are effective immediately, and any fines imposed must be paid through the HISA Portal by **April 3, 2026**. The instructions for payment through the HISA Portal are enclosed.

Please also be advised that a copy of this Notice or a summary thereof will be published on HIWU's website.

Horseracing Integrity & Welfare Unit

A handwritten signature in black ink, appearing to read "MPujals", is written over a horizontal line.

Michelle Pujals, HIWU General Counsel

Encls...:Final Decision of Internal Adjudication Panel  
Instructions for HISA Portal

cc (w/ encls.): Lawrence Lewis, Counsel for Mr. Lewis  
Murrey Seidner, Owner  
California Horse Racing Board  
HISA

**BEFORE THE INTERNAL ADJUDICATION PANEL**

**HIWU**

**Case Number:** ECM 2025-250  
**IAP Member** Juliet Kagno

v.

Craig Lewis

*[Insert Name of Covered Person]*

**FINAL RULING OF INTERNAL ADJUDICATION PANEL**

**Section One – Parties**

Date of Hearing: 2/17/26 (hearing waived, check here)

Date of Decision: 3/1/2026

HIWU Counsel: Christy Heath

Covered Person: Craig Lewis

Counsel/Representative of Covered Person: Lawrence Lewis

Any Third Parties: \_\_\_\_\_

**Section Two - Charges**

The Covered Person is charged with violating the following Series 3000 Equine Anti-Doping and Medication Control (ADMC) Program Rules (“Protocol”):

ADMC Program Rule 3312: Presence of a Controlled Medication Substance and/or its Metabolites or Markers in a Post-Race Sample: Methocarbamol.

### Section Three – Burdens of Proof and Evidence

A. Pursuant to ADMC Program Rule 3121 (Protocol), HIWU has established the following evidence, set forth in detail below, to the comfortable satisfaction of the hearing panel:

1. Trainer Craig Lewis was the responsible person for Covered Horse KIKURIDE on August 31, 2025, in race 11 at Del Mar Racetrack.
2. Sample Collection Personnel collected a post-race blood sample #B101315752 from first place finisher KIKURIDE on August 31, 2025 at Del Mar Racetrack.
3. Kenneth L. Maddy Equine Analytical Chemistry Laboratory (UC Davis) issued a Certificate of Analysis on September 19, 2025 reporting an Adverse Analytical Finding for the presence of Methocarbamol, a Class C Controlled Medication Substance in KIKURIDE's A sample.
4. Trainer Craig Lewis (through counsel) requested B sample analysis on September 25, 2025.
5. Equine Integrity and Anti-Doping Sciences Laboratory (EQIAS) confirmed the presence of Methocarbamol in KIKURIDE's B Sample on October 28, 2025.

B. Pursuant to ADMC Program Rule 3121 (Protocol), the Covered Person has established the following evidence, set forth in detail below, by a balance of probability:

Trainer Craig Lewis stated his Veterinarian of 40 years, Dr. John Araujo, administered Methocarbamol to KIKURIDE 48 hours in advance of KIKURIDE's August 31, 2025 race.

**Section Four – Violations Determined**

Based on the applicable ADMC Program Rules (Protocol) listed above in Section Two, and based upon the established evidence as set forth in Section Three above, the hearing panel has determined that the Covered Person has violated the following ADMC Program Rules (Protocol):

Covered Person (and Responsible Person) Trainer Craig Lewis has violated ADMC Program Rule 3312: Presence of a Controlled Medication Substance, for the presence of Methocarbamol, a Class C, S7 Controlled Substance, in the post-race sample of KIKURIDE.

**Section Five – Finding of No Fault/Negligence or No Significant Fault/Negligence**

Pursuant to ADMC Program Rules 3324 and 3325 (Protocol), a Covered Person is entitled to elimination or reduction of any period of Ineligibility if the hearing panel determines that the Covered Person has established that he or she bears No Fault or Negligence, or No Significant Fault or Negligence for the Violation(s). Based on the foregoing evidence, the IAP Member finds that the Covered Person  has  **has not** (*check one*) established that he or she bears **No Fault or Negligence**; or the Covered Person  has  **has not** (*check one*) established that he or she bears **No Significant Fault or Negligence** for the Violation(s). Where the Covered Person has established that he or she bears No Fault or Negligence or No Significant Fault or Negligence for the Violation(s), the following evidence supports this conclusion:

N/A

**Section Six – Elimination, reduction, or suspension of period of Ineligibility and/or other Consequences for reasons unrelated to degree of Fault**

Pursuant to ADMC Program Rule 3326(b) – (d) (Protocol), the Covered Person is entitled to elimination, reduction, or suspension of a period of Ineligibility and/or other Consequences if he or she has satisfied any of the following (*check all that apply*):

- Rule 3326(b): Voluntary Admission of a Controlled Medication Rule Violation in the absence of other evidence.
- Rule 3326(c): Application of multiple grounds for reduction of a sanction; where the Covered Person has established entitlement to a reduction or suspension of period of Ineligibility under two or more of Rules 3324, 3325, or 3326.
- Rule 3326(d): Reductions for certain Controlled Medication Rule Violations based on early admission and acceptance of sanction; where the Covered Person admits Violation(s) and accepts Consequence(s) within seven (7) days of receiving Charge Letter.

Based on the application of these Rules, the Covered Person is entitled to the following elimination, reduction, or suspension of a period of Ineligibility and/or other Consequences:

N/A

**Section Seven – Aggravating Circumstances**

HIWU has established the following aggravating circumstances to the comfortable satisfaction of the hearing panel (*write N/A if none*):

N/A

Based upon the Aggravating Circumstances, the Covered Person’s period of Ineligibility is increased by N/A months (up to 6 months), and an additional fine in the amount of \$ N/A is imposed (up to \$5,000.00 USD or 5% of the purse, whichever is greater).

### Section Eight - Consequences

The following Consequences are imposed upon the Covered Person for each violation that has been established in this case:

1. A fine of \$500 USD;
2. Disqualification of KIKURIDE's Race Results obtained in Race 11 at Del Mar Racetrack in Del Mar, California, on August 31, 2025, and forfeiture of all purses and other compensation, prizes, trophies, points, and rankings, and repayment or surrender (as applicable) to the Race Organizer pursuant to ADMC Program Rule 3321;
3. Assignment of 1.5 Penalty Points pursuant to ADMC Program Rule 3328; and
4. Public Disclosure pursuant to ADMC Program Rule 3620.

### Section Nine – Penalty Points

The total penalty points issued against Covered Person as a result of this final decision are: 1.5 .

The Covered Person has 0 prior penalty points, bringing his or her current total penalty points to 1.5 .

Subject to ADMC Program Rule 3364 (Protocol), this decision is final and binding pursuant to ADMC Program Rule 3363 (Protocol).

\_\_\_\_\_  
Juliet Kagno

Signature of IAP Member



**TAB 24**



March 4, 2026

Secretary of the Federal Trade Commission  
[electronicfilings@ftc.gov](mailto:electronicfilings@ftc.gov)

Re: HISA Civil Sanction Notice

This notice is provided by the Horseracing Integrity and Safety Authority, Inc. ("HISA") to the Federal Trade Commission (the "Commission") under 16 Code of Federal Regulations Part I, Section 1.145 in connection with the imposition of civil sanctions under 15 U.S.C. 3057(d) and 15 U.S.C. 3055(c)(4)(B) for a violation of Rule Series 3000, the Equine Anti-Doping and Controlled Medication Protocol approved by the Commission on March 27, 2023.

The following civil sanctions have been imposed against Craig Lewis, who is a Covered Person under the Horseracing Integrity and Safety Act of 2020, as amended:

1. Disqualification of the results of Kikuride obtained in Race 11 at Del Mar Racetrack in Del Mar, California on August 31, 2025, and forfeiture of all purses and other compensation, prizes, trophies, points, and rankings and repayment or surrender (as applicable) to the Race Organizer pursuant to ADMC Program Rule 3321;
2. A fine of \$500, in accordance with ADMC Program Rule 3323;
3. Assignment of 1.5 Penalty Points (ADMC Program Rule 3328); and
4. Public Disclosure in accordance with ADMC Program Rules 3620 and 3331.

Any communications regarding this notice or the civil sanction set forth herein should be directed to:

John L. Forgy  
Counsel to HISA  
830 Vermillion Peak Pass  
Lexington, KY 40515  
(859)-940-1215  
Email: [johnforgy1@gmail.com](mailto:johnforgy1@gmail.com)

/s/ John Forgy

John L. Forgy  
Counsel to HISA

cc: Craig Lewis  
Lawrence Lewis, Counsel for Mr. Lewis

## **Proof of Service**

I hereby certify that on March 4, 2026, pursuant to Federal Trade Commission Rule of Practice §4.4(d), I transmitted this HISA Civil Sanction Notice via email to Mr. Lawrence Lewis, counsel for Craig Lewis, at the email address ldlewis.law@gmail.com.

John L. Forgy  
Counsel for HISA  
830 Vermillion Peak Pass  
Lexington, KY 40515  
(859)-940-1215  
Email: johnforgy1@gmail.com

/s/ John Forgy

John L. Forgy  
Counsel for HISA