

PUBLIC

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES
FTC DOCKET NO. 9451**

ADMINISTRATIVE LAW JUDGE:

DANIA L. AYOUBI

IN THE MATTER OF:

WILLIAM E. MARCH

APPELLANT

APPEAL BOOK

May 18, 2026

Respectfully submitted,

STURGILL, TURNER, BARKER & MOLONEY,
PLLC

/s/ Bryan Beaman

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

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TAB 1



CONFIDENTIAL

Geneva N. Gnam, Esquire
Litigation Counsel
Horseracing Integrity & Welfare Unit
4801 Main Street
Suite 350
Kansas City, MO 64112-2749

February 4, 2026

SENT VIA EMAIL

William E. March
6301 Kellogg Rd.
Cincinnati, OH 45230
(727) 365-5222
cjmarch1316@gmail.com

Re: ECM Notice of Alleged Controlled Medication Rule Violation
Covered Horse: Protest
Sample #B200053581

Dear Mr. March:

This Equine Controlled Medication (“ECM”) Notice letter is issued pursuant to Anti-Doping and Medication Control (“ADMC”) Program Rule 3345 of the Protocol (defined below) and serves to inform you that a Sample collected from the Covered Horse Protest as a part of a Sample Collection Session conducted by the Horseracing Integrity & Welfare Unit (“HIWU”), or its authorized delegate, has resulted in an Adverse Analytical Finding (“AAF”) and may result in a Controlled Medication Rule Violation and related Consequences. The violation, as described below, may only be committed by Covered Persons, but the Consequences may apply to both you and Protest.

I. Controlled Medication Rules - General

You and Protest are subject to the Equine Anti-Doping and Controlled Medication Protocol codified as Rule Series 3000 of the ADMC Program (the “Protocol”), including its supporting rules and documents. Results Management of this matter is the responsibility of HIWU. HIWU



conducts Results Management in accordance with ADMC Program Rule 3340 *et seq.* of the Protocol and the Equine Testing and Investigations Standards. Capitalized terms used, but not defined within this letter, are as defined in Rule 1020 of the General Provisions and the Protocol.

II. Alleged Controlled Medication Rule Violation(s) and Potential Consequences - Specific

Specifically, as a Responsible Person as defined in ADMC Program Rule 3030 of the Protocol, ADMC Program Rule 3312 (Protocol) holds you strictly liable for any Controlled Medication Substance and/or its Metabolites or Markers present in a Post-Race Sample collected from your Covered Horse. Pursuant to the Protocol, the AAF may result in the following Controlled Medication Rule Violation: Presence of a Controlled Medication Substance and/or its Metabolites or Markers (ADMC Program Rule 3312) in a Post-Race Sample: Phenylbutazone.

If it is agreed or determined that a Controlled Medication Rule Violation has occurred, the following Consequences may be imposed pursuant to ADMC Program Rule 3323 of the Protocol as a first Controlled Medication Rule Violation within two (2) years involving a Class C Controlled Medication Substance:

- (1) A fine of \$500 USD;
- (2) Assignment of 1.5 penalty points pursuant to ADMC Program Rule 3328;
- (3) Public Disclosure pursuant to ADMC Program Rule 3620; and
- (4) Disqualification of the results of Protest obtained in Race 7 at Tampa Bay Downs in Tampa, Florida, on January 14, 2026, 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.

Note that, in the event that Protest's results are subject to automatic Disqualification pursuant to ADMC Program Rule 3321(a) of the Protocol, the Responsible Person, the Owner, and HIWU may agree to apply ADMC Program Rule 3321 immediately or any one of them may request that the Internal Adjudication Panel ("IAP") apply ADMC Program Rule 3321 immediately.



III. AAF Testing and Results

On January 14, 2026, Sample Collection Personnel collected a Post-Race blood Sample, designated as Sample #B200053581, from Protest following Race 7 at Tampa Bay Downs in Tampa, Florida. Protest’s A Sample was submitted to Industrial Laboratories (“Industrial”) in Denver, Colorado. Industrial analyzed the A Sample in accordance with the Equine Standards for Laboratories and Accreditation and reported an AAF because it detected Phenylbutazone. Phenylbutazone is a category S7, Class C Controlled Medication Substance on the Prohibited List and Technical Document. Industrial’s A Sample certificate of analysis is enclosed for your reference as well as a copy of the Sample Collection Documentation.

You, as the Responsible Person, and the Owner of Protest, have the right to request and receive copies of the A Sample Laboratory Documentation Package after the B Sample analysis has been completed or waived. The details regarding the B Sample are set forth below.

IV. B Sample Analysis

You and the Owner have the right to request the analysis of the B Sample. You or the Owner will be required to pay the cost, in advance, to have the B Sample analyzed and the B Sample Laboratory Documentation Package prepared. If you or the Owner would like the B Sample analyzed, please submit a request, in writing, to banalysis@hiwu.org by **5pm CST on February 9, 2026**. If such a request is not made by the deadline, then the B Sample analysis will be deemed waived.

Provided HIWU receives a request sent in writing to banalysis@hiwu.org by **5pm CST on February 9, 2026**, you or the Owner will be sent an invoice to pay for the B Sample analysis. Such payment should be made on the Horseracing Integrity and Safety Authority’s (“HISA”) online portal and must be received before the Laboratory begins analysis of the B Sample. After payment is received, HIWU will notify you and the Owner of the scheduled date and time of the B Sample opening, as well as the location of the Laboratory where the B Sample analysis will be completed. If you or the Owner do not pay within seven (7) days of the date of the invoice then the B Sample analysis will be deemed waived.

If you or the Owner wish to receive the B Sample Laboratory Documentation Package you must specifically request it in the email you send to banalysis@hiwu.org requesting analysis of the B Sample.

You and the Owner, if agreed upon, may waive analysis of the B Sample and accept the A Sample results. If you and the Owner choose to accept the A Sample results, please sign the



enclosed Acceptance of A Sample Results and B Sample Waiver Form and return it to ggnam@hiwu.org by **5pm CST on February 9, 2026**. Please note that, regardless of said waiver, HIWU retains the right to proceed with the B Sample analysis at its own expense.

If you intend to participate in a Covered Horserace within forty-five (45) days, HIWU may, in its sole discretion, choose to address the case on an expedited basis to ensure resolution of the matter prior to the Covered Horserace. Please notify HIWU, in writing, immediately if you intend to participate in any Covered Horserace within forty-five (45) days.

V. Resolution and Your Rights Under the Protocol: Substantial Assistance, Early Admission, and Explanation

In accordance with ADMC Program Rule 3326 of the Protocol, you have the opportunity to provide Substantial Assistance or admit the alleged Controlled Medication Rule Violation with the potential benefit of receiving a reduction to any Consequences that may be imposed. Further, you may seek to enter into a case resolution without a hearing pursuant to ADMC Program Rule 3349 (Protocol). Please note, at any time during or after the Results Management of your matter, you can provide Substantial Assistance and HIWU will evaluate if a suspension of all or part of the Consequences is appropriate.

At this time, prior to the issuance of formal charges, you have the opportunity to provide an explanation to HIWU. Please submit all applicable information along with your explanation to HIWU’s Litigation Counsel, Geneva N. Gnam, by email to ggnam@hiwu.org by **5pm CST on February 11, 2026**. Furthermore, if you seek to enter into a case resolution without a hearing, please notify HIWU, in writing, immediately.

VI. Other Information

Please note that, since this matter involves a Controlled Medication Substance, this letter does not affect Protest’s eligibility to participate in a Covered Horserace or Timed and Reported Workout. As a reminder, Protest remains subject to Testing pending the outcome of this matter.

Pursuant to ADMC Program Rule 3610(b) of the Protocol, HIWU will use its reasonable endeavors to ensure that Persons under its control do not publicly identify Covered Horses or Covered Persons who are alleged to have committed a violation under the Protocol, unless and until: (i) in presence cases, the B Sample confirms the results of the A Sample analysis, or the B Sample analysis is waived; (ii) a Provisional Suspension has been imposed or voluntarily accepted, (iii) a charge has been brought; or (iv) a violation has been admitted, whichever is earlier. In such circumstances (except where the Covered Person is a Minor), HIWU shall publicly report: (i) the



identity of any Covered Person who is the subject of the alleged violation; (ii) the identity of any relevant Covered Horses(s); and (iii) the rule violated and, where appropriate, the basis of the asserted violation. HIWU shall not be required to publicly report a matter if it would risk compromising an ongoing investigation or proceeding. If HIWU determines that an ongoing investigation or proceeding will no longer be compromised by public reporting, HIWU shall at such time make any public reporting. HIWU shall Publicly Disclose the resolution of an alleged violation of the Protocol in accordance with ADMC Program Rule 3620.

By copy of this ECM Notice letter, HIWU is notifying the Owner, the Florida Gaming Control Commission, and HISA.

Please read this ECM Notice letter carefully and take note of the deadlines set forth herein. You have the right to contact an attorney of your choosing in an effort to seek legal advice, should you choose to do so. If you have any questions regarding this letter, please contact me at (816) 601-6897 or ggnam@hiwu.org.

Sincerely,

Geneva N. Gnam
Litigation Counsel

Encls.: A Sample Certificate of Analysis
Sample Collection Documentation
B Sample Analysis Waiver Form
HISA Covered Person Pro Bono Program

cc (w/ encls.): Carla March, Owner
Florida Gaming Control Commission
John Roach, HISA
Samuel Reinhardt, HISA
Lisa Lazarus, HISA



CERTIFICATE OF ANALYSIS

Report # Rpt-260129031

Page 1 of 1

Industrial Laboratories

Horseracing Integrity & Welfare Unit
 4801 Main St
 Suite 350
 Kansas City, MO 64112

FINAL POSITIVE REPORT

I hereby certify that The Industrial Laboratories Company has analyzed the sample identified below :

Sample ID:	200053581	Sample Type:	BLOOD & URINE
Collected At:	Tampa Bay	Test Type:	Post-Race*
Collection Date:	January 14, 2026	Sex/Gender:	GELDING*
		Authorized Medication:	Lasix*

Date Received:	January 15, 2026	Seal Number:	5003376*
Sample Condition:	Acceptable/Secure	Laboratory ID:	260115013-001

The sample was held for further testing based on the results of the screening tests conducted from: January 15, 2026 to January 22, 2026.

Confirmatory testing using Liquid Chromatography - Tandem Mass Spectrometry (LC-MS/MS) gave the following result(s)**:

ADVERSE ANALYTICAL FINDING

Phenylbutazone confirmed in blood.

Comment(s): No Hydrolysis

These testing results only pertain to the sample that was tested and the specified analyte.

I further certify that the confirmatory data supporting this Adverse Analytical Finding was reviewed for accuracy by two separate Certifying Reviewers / Certifying Scientists.

SIGNED:

Timothy R. Krueger

Senior Chemist

Date: 1/29/2026

* This information was provided by the submitting party
 ** Industrial Laboratories does not make any recommendations regarding follow-up actions in response to this result.
 Sample confirmed using Method(s): IL-DTS-S-002, IL-DTS-M-012

Sample Collection Form

Test Session

Notification Information

01/14/2026 Notification Date (month/day/year)	3:38 <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM Time of Notification/Tagging	Sample Collection Personnel named here is authorized by HIWU to tag the identified horse and provide notice to the Nominated/Responsible Person to report for testing. Notified By (print name) Samantha Randazzo	
Tampa Bay Location of Test (city/state)	TAM-PR-01142026 Mission Code	3:46 <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM Time of Arrival	Protest Name of Covered Horse
By signing, I acknowledge and accept the notification that the Covered Horse named on this form has been selected for Sample collection. / Al firmar, reconozco y acepto la notificación de que el caballo cubierto mencionado en esta forma ha sido seleccionado para la recolección de Muestras. Roberto Madera <i>Roberto Madera</i>			<input checked="" type="checkbox"/> Winner <input type="checkbox"/> Special Post-Race Test Reason
<input checked="" type="checkbox"/> Photo ID verified Nominated/Responsible Person (print and sign)			IF APPLICABLE (print):
IF APPLICABLE: By signing, I acknowledge and accept the notification that the Covered Horse named on this form has been selected for Sample collection. / Al firmar, reconozco y acepto la notificación de que el caballo cubierto mencionado en esta forma ha sido seleccionado para la recolección de Muestras.			Additional Covered Person Name
<input type="checkbox"/> Photo ID verified Replacement Nominated/Responsible Person (print and sign)			

Covered Horse Information

William March Responsible Person Name (Print)	Means of Validating Horse ID <input checked="" type="checkbox"/> Microchip <u>981020033723063</u> <input type="checkbox"/> Tattoo/Brand _____ <input type="checkbox"/> Recorded Horse Markings <input type="checkbox"/> Photo Taken		Color of Horse <input type="checkbox"/> B (bay) <input type="checkbox"/> Gr/Ro (gray or roan) <input type="checkbox"/> Blk (black) <input type="checkbox"/> Pal (palomino) <input type="checkbox"/> Ch (chestnut) <input type="checkbox"/> Wh (white) <input checked="" type="checkbox"/> Dk B (dark bay/brown)	
	Lasix <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		Sex of Horse <input type="checkbox"/> Filly <input type="checkbox"/> Mare <input type="checkbox"/> Colt <input type="checkbox"/> Stallion <input type="checkbox"/> Ridgling <input checked="" type="checkbox"/> Gelding	

Test Type: Post-Race Out-of-Competition Claimed Fatality/Injury (Post-Race)
 Vets' List Clearance Post-Work Fatality/Injury (Other)

BLOOD

As Sample Collection Personnel authorized by HIWU, by signing 'Collected by' I affirm that collection equipment used was examined and found to be intact, and that the Sample collected was from the identified horse.
 As Sample Collection Personnel authorized by HIWU, by signing 'Sealed by' I affirm that the Sample collected and containers used are properly sealed, and Sample Codes match.

Sample Information

B200053581 Sample Code	4 # of Tubes Sealed	<input checked="" type="checkbox"/> YES (≥ 30mL) <input type="checkbox"/> NO (< 30mL) Adequate Sample	01/14/2026 Sample Sealed Date	4:29 Sample Sealed Time	Collected by (print & sign) Dr Richard Rock <i>Richard Rock</i> Sealed by (print & sign) Katie Mancini Wales <i>Katie Mancini Wales</i>
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URINE

U200053581 Sample Code	2 # of Bottles Sealed	<input checked="" type="checkbox"/> YES (≥ 50mL) <input type="checkbox"/> NO (< 50mL) Adequate Sample	01/14/2026 Sample Sealed Date	4:30 Sample Sealed Time	Collected by (print & sign) Samantha Randazzo <i>Samantha Randazzo</i> Sealed by (print & sign) Katie Mancini Wales <i>Katie Mancini Wales</i>
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HAIR

Sample Code	Source <input type="checkbox"/> Mane <input type="checkbox"/> Tail	Method <input type="checkbox"/> Pulled <input type="checkbox"/> Cut	Sample Sealed Date	Sample Sealed Time <input type="checkbox"/> AM <input type="checkbox"/> PM	Collected by (print & sign) Sealed by (print & sign)
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Signatures

I declare that this documentation accurately reflects the details of this Sample Collection Session. I further declare that, subject to the statement(s) made on a Supplementary Report(s), if any, this Sample collection was conducted in compliance with the applicable procedures for HIWU Sample collections. / Yo declaro que esta documentación refleja con precisión los detalles de esta Sesión de Recolección de Muestras. Además, declaro que, sujeto a la(s) declaración(es) hecha(s) en el(los) Formulario(s) de Reporte(s) Suplementario(s), si hay alguno, esta recolección de Muestras se realizó en cumplimiento con los procedimientos aplicables para la recolección de muestras de HIWU.

Roberto Madera Nominated/Responsible Person – print name	<i>Roberto Madera</i> Nominated/Responsible Person – signature	Test Session Concluded Date: <u>01/14/2026</u> Time: <u>4:31</u> <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM
Katie Mancini Wales Collection Officer (DCO/BCO) – print name	<i>Katie Mancini Wales</i> Collection Officer (DCO/BCO) – signature	

There are _____ Supplementary Report(s) associated with this Sample Collection Session.

Pursuant to HIWU Regulations:

The Covered Horse named on this form is required to undergo Sample collection. The Covered Horse must be brought to the Test Barn as soon as practicable, unless there are valid reasons for delay (as determined by Sample Collection Personnel).

As the Nominated/Responsible Person, your responsibilities are:

- To report to the Test Barn located on the backside of this racetrack;
- To comply and cooperate with Sample collection procedures and processes, your failure of which may result in significant penalties;
- To ensure that the Covered Horse remains under continuous observation of the Sample Collection Personnel, to the extent possible, until the completion of the Sample collection process;
- To remain with the Covered Horse, to the extent possible, until completion of the Sample collection process;
- On request, to produce identification for yourself and facilitate the identification of the Covered Horse;
- To ensure that the Covered Horse is not administered any medications or supplements from notification of Sample collection until completion of the Sample collection process, unless there is a medical emergency (as determined by the Test Barn Veterinarian or a Regulatory Veterinarian);
- To confirm that the Covered Horse's water bucket is clean and acceptable and ensure that it is only used for your Covered Horse during the Sample collection process.

AVISO DE SELECCIÓN: RECOLECCIÓN DE PRUEBAS DESPUES DE LA CARRERA

De acuerdo con las regulaciones de HIWU:

El Caballo cubierto mencionado en esta forma debe someterse a la recolección de muestras. El caballo cubierto debe llevarse al establo de prueba tan pronto como sea posible, a menos que existan razones válidas para demorarse (según lo determine el personal de recolección de muestras).

Como Persona Designada/Responsable, sus responsabilidades son:

- Presentarse al Establo de Pruebas ubicado en la parte trasera del hipódromo;
- Cumplir y cooperar con los procedimientos y procesos de recolección de Muestras, incumplimiento puede resultar en sanciones significativas;
- Garantizar que el Caballo cubierto permanezca bajo la observación continua del Personal de recolección de Muestras, en la medida posible, en todo momento hasta la finalización del proceso de recolección de Muestras;
- Permanecer con el Caballo cubierto, lo más posible, hasta que se complete el proceso de recolección de Muestras;
- Bajo pedido, debe presentar identificación de usted y facilitar la identificación del Caballo cubierto;
- Asegurarse de que al Caballo cubierto no se le administren medicamentos o suplementos desde la notificación de la recolección de Muestras hasta la finalización del proceso de recolección de Muestras, a menos que haya una emergencia médica (según lo determine el Veterinario del Establo de pruebas o un Veterinario regulador);
- Confirmar que el balde de agua del Caballo cubierto esté limpio y aceptable y asegurarse de que solo se use para su Caballo cubierto durante el proceso de recolección de muestras.

NOTICE OF SELECTION: OUT-OF-COMPETITION TESTING

Pursuant to HIWU Regulations:

The Covered Horse named on this form is required to undergo Sample collection. Immediate access to the Covered Horse shall be granted and the Sample collection process shall take place immediately in a secure location, unless there are valid reasons for delay (as determined by Sample Collection Personnel). Failure to produce the Covered Horse for Sample collection within six (6) hours of notification may result in significant penalties for the Responsible Person.

As the Nominated/Responsible Person, your responsibilities are:

- To comply and cooperate with Sample collection procedures and processes, your failure of which may result in significant penalties;
- To ensure that the Covered Horse remains under continuous observation of the Sample Collection Personnel at all times until the completion of the Sample collection process;
- To remain with the Covered Horse until completion of the Sample collection process;
- On request, to produce identification for yourself and facilitate the identification of the Covered Horse;
- To ensure that the Covered Horse is not administered any medications or supplements from notification of Sample collection until completion of the Sample collection process, unless there is a medical emergency (as determined by a Regulatory Veterinarian, or, if not available, a Veterinarian).

AVISO DE SELECCIÓN: RECOLECCIÓN DE PRUEBAS FUERA DE COMPETICIÓN

De acuerdo con las regulaciones de HIWU:

El Caballo cubierto mencionado en esta forma debe someterse a la recolección de muestras. Debe otorgarnos acceso inmediato al Caballo cubierto, el proceso de recolección de muestras se llevará a cabo de inmediato en un lugar seguro, a menos que existan razones válidas para demorarse (según lo determine el Personal de recolección de muestras). Falta de no presentar el Caballo cubierto para la recolección de muestras dentro de las seis (6) horas posteriores a la notificación puede resultar en sanciones significativas para la Persona responsable.

Como Persona Designada/Responsable, sus responsabilidades son:

- Cumplir y cooperar con los procedimientos y procesos de recolección de Muestras, incumplimiento puede resultar en sanciones significativas;
- Garantizar que el Caballo cubierto permanezca bajo la observación continua del Personal de recolección de Muestras en todo momento hasta la finalización del proceso de recolección de Muestras;
- Permanecer con el Caballo cubierto hasta que se finalice el proceso de recolección de Muestras;
- Bajo pedido, presentar una identificación de usted y facilitar la identificación del Caballo cubierto;
- Asegurarse de que al Caballo cubierto no se le administren medicamentos o suplementos desde la notificación de la recolección de Muestras hasta la finalización del proceso de recolección de Muestras, a menos que haya una emergencia médica (según lo determine un Veterinario regulador o, si no está disponible, un Veterinario).



Acceptance of A Sample Analytical Results and B Sample Analysis Waiver Form

Covered Horse: Protest

Sample: #B200053581

Responsible Person: William E. March

Owner: Carla March

I accept the result of Industrial Laboratories (“Industrial”) in Denver, Colorado that Protest’s Post-Race blood Sample #B200053581, collected following Race 7 at Tampa Bay Downs in Tampa, Florida on January 14, 2026, was reported as an Adverse Analytical Finding (“AAF”) because it detected Phenylbutazone, a Class C Controlled Medication Substance.

I understand that in accordance with the Equine Anti-Doping and Controlled Medication Protocol, Protest’s Sample #B200053581 shall not be considered an AAF until the B Sample analysis confirms the A Sample analysis, the Responsible Person or the Owner does not timely request the B Sample analysis, or the Responsible Person and the Owner, if agreed upon, waive the B Sample analysis by signing this form. I understand that Industrial’s result is based on the analysis of the A Sample of Sample #B200053581 only.

I understand that I have the right to have the B Sample analysis completed and I voluntarily, knowingly, and intelligently waive the right to have the B Sample analysis completed. I do not contest Industrial’s results of Protest’s Sample #B200053581.

Signature of William E. March

Date

Printed Name of William E. March

Signature of Carla March

Date

Printed Name of Carla March



COVERED PERSON PRO BONO PROGRAM

The Horseracing Integrity and Safety Authority, Inc. (“HISA”) has established a pro bono program to assist low-income Covered Persons alleged to have committed a Controlled Medication Violation or Anti-Doping Rule Violation under HISA’s Anti-Doping and Medication Control Program (the “Covered Person Pro Bono Program”). The Covered Person Pro Bono Program is designed to match Covered Persons who are financially unable to secure legal representation with volunteer attorneys who have agreed to provide legal services without any expectation of compensation.

DO I QUALIFY FOR A VOLUNTEER ATTORNEY?

To be eligible for a volunteer attorney, you must meet these requirements:

1. Type of Case

- The Horseracing Integrity and Welfare Unit (“HIWU”) has alleged that you committed:
 - A Controlled Medication Violation; or
 - An Anti-Doping Rule Violation.

2. Income and Assets

- Your annual household adjusted gross income is \$75,000 or less; **AND**
- You have no significant liquid assets (Liquid assets include funds that are in the form of cash or can be quickly converted to cash, and investments capable of being quickly converted to cash without significant loss. Liquid assets do not include your residence or retirement account(s)).

HOW DO I APPLY FOR A VOLUNTEER ATTORNEY?

To apply for assistance, you must electronically submit the following to jim.gates@hisaus.org:

1. HISA’s Application for Pro Bono Services

- The application is available online at [Covered-Person-Pro-Bono-Program-Application.pdf \(wpenline.com\)](#).

2. Your Most Recent IRS Form 1040 (redacted)

- Social security number(s) must be redacted from this form.

Information and documents submitted in connection with your application will only be used to determine whether you are eligible for pro bono services under this Program. The documents will be destroyed at the conclusion of the eligibility determination.

WHAT HAPPENS TO MY CASE DURING THE APPLICATION PROCESS?

Submitting an application to the Covered Person Pro Bono Program has no impact on your pending case, and all case deadlines and dates remain in place and are not extended by the filing of an application unless an extension is requested and granted by HIWU.

WHAT IF I HAVE QUESTIONS ABOUT THE COVERED PERSON PRO BONO PROGRAM?

Contact HISA/HIWU Ombudsman, Alan Foreman, Alan@ForemanLaw.net.

TAB 2

Monica Pilarski

From: Monica Pilarski
Sent: Wednesday, February 4, 2026 11:24 AM
To: cjmarch1316@gmail.com
Cc: Geneva Gnam
Subject: HIWU: ECM Notice - Potential Controlled Medication Rule Violation(s) - March, William/Protest
Attachments: 2026-02-04 ECM Notice Letter to March, William re Protest - AAF (w encls.).pdf

Dear Mr. March,

THE ATTACHED DOCUMENT IS NOTICE OF AN ALLEGED CONTROLLED MEDICATION PRESENCE RULE VIOLATION (OVERAGE) FROM A POST-RACE SAMPLE. PLEASE NOTE THE IMPORTANT DEADLINES LISTED IN THE NOTICE.

DATE OF POTENTIAL VIOLATION: 01/14/26
COVERED HORSE: Protest
SUBSTANCE INVOLVED: Phenylbutazone (Class C)

PLEASE BE ADVISED THAT THIS IS NOT A CHARGE BUT INSTEAD NOTICE OF A POTENTIAL VIOLATION AND AN OPPORTUNITY FOR YOU TO PROVIDE INFORMATION TO HIWU TO EXPLAIN WHAT HAPPENED.

YOU HAVE UNTIL 02/09/26 TO REQUEST B SAMPLE ANALYSIS BY SENDING AN EMAIL TO banalysis@hiwu.org.

YOUR CASE HAS BEEN ASSIGNED TO GENEVA GNAM OF HIWU WHO CAN BE REACHED AT ggnam@hiwu.org or (816) 601-6897.

IF YOU HAVE QUESTIONS ABOUT THE PROCESS, CONTACT THE HISA/HIWU OMBUDSMAN ALAN FOREMAN AT Alan@ForemanLaw.net.

THIS LINKED VIDEO WALKS COVERED PERSONS THROUGH THEIR INITIAL RIGHTS, RESPONSIBILITIES, AND NEXT STEPS FOLLOWING NOTICE OF A POSITIVE TEST UNDER HISA'S ANTI-DOPING AND MEDICATION CONTROL PROGRAM: <https://www.hiwu.org/education-and-resources/navigating-a-positive-test-under-the-admc-program-now-what>.

Thank you,



Monica Pilarski | HIWU Legal Specialist

Horseracing Integrity & Welfare Unit

Drug Free Sport International

mpilarski@hiwu.org

Cell: (816) 601-5832

4801 Main Street, Suite 350

Kansas City, MO 64112

hiwu.org

drugfreesport.com



Drug Free Sport
INTERNATIONAL™

TAB 3

Monica Pilarski

From: Monica Pilarski
Sent: Wednesday, February 4, 2026 11:25 AM
To: 'cjMarch1316@gmail.com'
Cc: Geneva Gnam
Subject: HIWU: ECM Notice - Potential Controlled Medication Rule Violation(s) - March, William/Protest
Attachments: 2026-02-04 ECM Notice Letter to March, William re Protest - AAF (w encls.).pdf

Dear Ms. March,

Please see the attached letter to William March regarding potential Controlled Medication Rule Violation(s).

This linked video walks covered persons through their initial rights, responsibilities, and next steps following notice of a positive test under HISA's Anti-Doping and Medication Control Program:
<https://www.hiwu.org/education-and-resources/navigating-a-positive-test-under-the-admc-program-now-what>

If you have any questions, please contact Geneva Gnam at ggnam@hiwu.org or (816) 601-6897.

Thank you,



Monica Pilarski | HIWU Legal Specialist

Horseracing Integrity & Welfare Unit

Drug Free Sport International

mpilarski@hiwu.org

Cell: (816) 601-5832

4801 Main Street, Suite 350

Kansas City, MO 64112

hiwu.org

drugfreesport.com



TAB 4

Monica Pilarski

From: Geneva Gnam
Sent: Monday, February 9, 2026 1:05 PM
To: Carla March
Cc: Monica Pilarski
Subject: Re: William March
Attachments: Protest litigation.docx

Good afternoon,

Confirming receipt.

Geneva

Geneva N. Gnam, Esquire | Litigation Counsel
Horseracing Integrity & Welfare Unit
Drug Free Sport International
C: (816) 601-6897
E: ggnam@hiwu.org

From: Carla March <cjmarch1316@gmail.com>
Sent: Monday, February 9, 2026 12:19 PM
To: Geneva Gnam <ggnam@hiwu.org>
Subject: William March

please find attached file

Sunday, February 7, 2026

Geneva N. Gnam, Esq
Litigation Counsel
Horseracing Integrity and Welfare Unit
Suite 350
4801 Main St
Kansas City, MO 64112-2749

Ref: William E. March Trainer
2960 Sutherland Ct
Palm Harbor, FL 34684
(727)-3655222
Horse: Protest
Date Of Race; January 14, 2026
Sample #B200053581

**Response to ECM Notice of Alleged Controlled Medication Rule
Violation of February 4, 2026**

Dear Ms. Gnam,

The notice of Alleged Controlled Medication Rule Violation was received on my wife's email of February 4, 2026 (cjmarch1316@gmail.com).

I move for an immediate stay, followed by dismissal of any recommended disciplinary action from the alleged findings of HIWU's Rpt-260129031.

FACTS

1. **Sample Collection Form, Test Session (January 14, 2026)**, From section's, Sample Information through section Signatures, the printed instructions in parenthesis are ; (Collected by (print & sign). And Sealed by (print & sign). The instructions are printed at the right end of. Sections; BLOOD(B200053581) and URINE(U200053581).

Instructions;

“As Sample Collection Personnel authorized by HIWU, by signing, Collected by/ affirm that collection equipment used was examined and found to be intact, and that the Sample collected was from the identified horse.”

“As Sample Collection Personnel authorized by HIWU, by signing, Sealed by/ affirm that the sample collected and containers used are properly sealed and sample codes match.”

2. **On the BLOOD and URINE samples collected sections**
The name Katie Marcini Wales was typed on both the right side of the BLOOD section and the right side of URINE section. No complete signatures appear to the right of her name and the two initialings do NOT MATCH (The two signatures are obviously written by different people). Therefore , it is not known who pulled the blood from the horse and the test results are not valid.
3. These faults/errors do not accurately document the accountability of the Sample Collecting. It leaves room for error; responsibility, accuracy, and reliability that the samples were drawn from the

horse, Protest, on January 14, 2026. Identification, reliability and validity are important aspects of any test.

4. There is no signature of Roberto Madera in the Notification Information section Sample Collection Form. Someone printed Robertom. In the Signatures section, the Nominated /Responsible Person-signature spot appears half printed and half hand written and appears to indicate that Roberto Maler signed as the responsible person.

In The Future please announce, “will Trainer, William E. March come to the spit barn?” (OR) Have the Responsible Person sign the Sample Collection Form PROPERLLY.

I have been a lincensed trainer in Florida, other states, and Canada since before March 29, 1989. I was first licensed at Tampa Bay Down. My first winner was ZACKSOUDARD, a horse purchased from the University of Kentucky teachers of the course PROPER HORSESHOING.

NO POSITIVES IN 37 YEARS.

SINCERELY,

(sent via email and FAX)

WILLIAM E. MARCH, TRAINER
2960 Sutherland Court
Palm Harbor, Florida 34684
(727)365-5222
License #302380

Cc: CARLA MARCH, OWNER

GENEVA N. GNAM, ESQ.
ggnam@hiwu.org
e-mailed, Monday, February 9, 2026.
Time: 11:59am_____

Monica Pilarski
mpilarski@hiwu.com
e-mailed, Monday, February 9, 2026
Time: 11:59am_____

TAB 5

FACTS

1. **Sample Collection Form, Test Session (January 14, 2026)**, From section's, Sample Information through section Signatures, the printed instructions in parenthesis are ; (Collected by (print & sign). And Sealed by (print & sign). The instructions are printed at the right end of. Sections; BLOOD(B200053581) and URINE(U200053581).

Instructions;

“As Sample Collection Personnel authorized by HIWU, by signing, Collected by/ affirm that collection equipment used was examined and found to be intact, and that the Sample collected was from the identified horse.”

“As Sample Collection Personnel authorized by HIWU, by signing, Sealed by/ affirm that the sample collected and containers used are properly sealed and sample codes match.”

2. **On the BLOOD and URINE samples collected sections**

The name Katie Marcini Wales was typed on both the right side of the BLOOD section and the right side of URINE section. No complete signatures appear to the right of her name and the two initialings do NOT MATCH (The two signatures are obviously written by different people). Therefore , it is not known who pulled the blood from the horse and the test results are not valid.

3. These faults/errors do not accurately document the accountability of the Sample Collecting. It leaves room for error; responsibility, accuracy, and reliability that the samples were drawn from the

Sunday, February 7, 2026

Geneva N. Gnam, Esq
Litigation Counsel
Horseracing Integrity and Welfare Unit
Suite 350
4801 Main St
Kansas City, MO 64112-2749

Ref: William E. March Trainer
2960 Sutherland Ct
Palm Harbor, FL 34684
(727)-3655222
Horse: Protest
Date Of Race; January 14, 2026
Sample #B200053581

**Response to ECM Notice of Alleged Controlled Medication Rule
Violation of February 4, 2026**

Dear Ms. Gnam,

The notice of Alleged Controlled Medication Rule Violation was received on my wife's email of February 4, 2026 (cjmarch1316@gmail.com).

I move for an immediate stay, followed by dismissal of any recommended disciplinary action from the alleged findings of HIWU's Rpt-260129031.

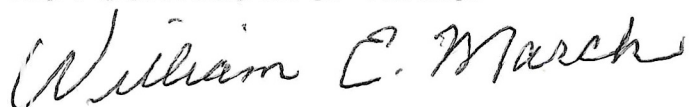
horse, Protest, on January 14, 2026. Identification, reliability and validity are important aspects of any test.

4. There is no signature of Roberto Madera in the Notification Information section Sample Collection Form. Someone printed Robertom. In the Signatures section, the Nominated /Responsible Person-signature spot appears half printed and half hand written and appears to indicate that Roberto Maler signed as the responsible person.

In The Future please announce, “will Trainer, William E. March come to the spit barn?” (OR) Have the Responsible Person sign the Sample Collection Form PROPERLLY.

I have been a lincensed trainer in Florida, other states, and Canada since before March 29, 1989. I was first licensed at Tampa Bay Down. My first winner was ZACKSOUNDARD, a horse purchased from the University of Kentucky teachers of the course PROPER HORSESHOING.

NO POSITIVES IN 37 YEARS.



SINCERELY,

(sent via email and FAX)

WILLIAM E. MARCH, TRAINER
2960 Sutherland Court
Palm Harbor, Florida 34684
(727)365-5222
License #302380

Cc: CARLA MARCH, OWNER

GENEVA N. GNAM, ESQ.

ggnam@hiwu.org

e-mailed, Monday, February 9, 2026.

Time: 11:59am 4:30 PM

Monica Pilarski

mpilarski@hiwu.com

e-mailed, Monday, February 9, 2026

Time: 11:59am 4:30 PM

TAB 6

Monica Pilarski

From: Geneva Gnam
Sent: Monday, February 9, 2026 3:57 PM
To: Monica Pilarski
Subject: Re: ECM Notice William March

From: Monica Pilarski <mpilarski@hiwu.org>
Sent: Monday, February 9, 2026 3:56 PM
To: Carla March <cjmarch1316@gmail.com>
Cc: Geneva Gnam <ggnam@hiwu.org>
Subject: RE: ECM Notice William March

Hello,

Our fax number is 816-285-1433, or you can send it via email to this email address.

Thanks,



Monica Pilarski | HIWU Legal Specialist

Horseracing Integrity & Welfare Unit
Drug Free Sport International

mpilarski@hiwu.org
Cell: (816) 601-5832
4801 Main Street, Suite 350
Kansas City, MO 64112

hiwu.org
drugfreesport.com



From: Carla March <cjmarch1316@gmail.com>
Sent: Monday, February 9, 2026 2:46 PM
To: Monica Pilarski <mpilarski@hiwu.org>
Subject: ECM Notice William March

Please send me your FAX number
thankyou

TAB 7

Monica Pilarski

From: Geneva Gnam
Sent: Thursday, February 12, 2026 5:10 PM
To: Monica Pilarski; billmarchtrainer@gmail.com
Cc: Monica Pilarski; Carla March
Subject: March/Protest - Document Requests

Mr. March:

Any requests for information need to be addressed to HIWU. As such, Industrial Laboratories will not be responding to your inquiries from today. There is no right to discovery or wide-ranging document production under the ADMC Program. Accordingly, please note:

1. HIWU has requested a copy of the A Sample Laboratory Documentation Package and will provide it to you upon receipt in accordance with ADMC Program Rule 3345(a)(3).
2. As indicated in Section IV of the February 4, 2026 Notice Letter, the deadline to request analysis of Protest's B Sample was Monday February 9, 2026 at 5pm CST. No such request was made, and accordingly, the B Sample analysis is deemed waived pursuant to ADMC Program Rule 3345(a)(4)(ii).

Apart from the above, HIWU will not be providing any of the documentation requested as the requests are outside the scope of ADMC Program Rules. A Charge Letter will be issued tomorrow, which will detail your options moving forward.

Geneva

Geneva N. Gnam, Esquire | Litigation Counsel
Horseracing Integrity & Welfare Unit
Drug Free Sport International
C: (816) 601-6897
E: ggnam@hiwu.org

From: Staples Print & Marketing Services <Ccreg05@staplesbusinesscenter.com>
Sent: Thursday, February 12, 2026 4:08 PM
To: Geneva Gnam <ggnam@hiwu.org>; Monica Pilarski <mpilarski@hiwu.org>; banalysis@hiwu.org <banalysis@hiwu.org>; billmarchtrainer@gmail.com <billmarchtrainer@gmail.com>; tkruegar@industriallaboratories.net <tkruegar@industriallaboratories.net>
Subject: Scan from Staples

Please find the scanned documents from Staples attached to this email. -william e march

Wednesday, February 11, 2025

Timothy R. Kruegar
Senior Chemist
Industrial Laboratories
4801. Main Street
Suite 350
Kansas City, MO 64112

REQUEST FOR PRODUCTION

Please send the following to my address below;

William E. March
Thoroughbred Horse Trainer
2960 Sutherland Court
Palm Harbor, Florida 3469845

Items requested;

1. Timothy R. Kruegar's. Curricular Vitae or wok history used for job application.
2. The date and position hired for at the Industrial Laboratories.
3. College attended and years of attendance.
4. Date of Graduation and degree received
5. Date of employment with Industrial Laboratories, position?
6. Any promotion's and date's.
7. Tests taken by each employee for advancement and score.

8. A copy of the complete Laboratory File and Procedure's used in the tests(Seal Number: 5003376, Laboratory: ID: 260115013-001 and Seal Number 5003376. Include copy of notes on the covers, inside and outside.
9. The same records are requested from the files of the "two seperate Certified Reviewers/Certifying Scientists" and their position and job in the laboratory. Include education and length of employment.
12. Were the "Reviewers/Scientists" given verbal or written instructions by their supervisor Timothy R. Krueger. Include a copy of the instructions in your package.
13. A complete copy of my file, test results, employee that performed the tests and results.
14. Please make sure the file includes tests and results from. IL-DTS-S-002 and IL-DTS-M-012. What employees were involved in these tests.

Please keep my "B" sample Urine and Blood safely stored. Please give me Information/verification on the quantity of Blood and Urine remaining following your completion the tests performed. This information should be in the records requested. I may want a split sample in the future

Prepared by,

William E. March

Trainer William E. March
Thoroughbred Horse Trainer
2960 Sutherland Court
Palm Harbor, Florida. 34684
(727)365-5222

Cc: Carla March, Wife and Owner

Geneva N. Gnam, Esq. (HIWU)
Litigation Counsel Welfare Unit
Horseracing Integrity & Welfare Unit
4801 Main Street
Suite 350
Kansas City, Missouri, MO. 64112-2749
ggnam@hiwu.org

Monica Pilarski
HIWU Legal Specialist
mpilarski@hiwu.org

HIWU
banalysis@hiwu.org

Timothy Krueger
Industrial Laboratories
(303)287-9691
tkrueger@industriallaboratories.net

TAB 8



CONFIDENTIAL

Geneva N. Gnam, Esquire
Litigation Counsel
Horseracing Integrity & Welfare Unit
4801 Main Street
Suite 350
Kansas City, MO 64112-2749

February 13, 2026

SENT VIA EMAIL

William E. March
6301 Kellogg Rd.
Cincinnati, OH 45230
(727) 365-5222
cjmarch1316@gmail.com

Re: ECM Charge of Controlled Medication Rule Violation
Covered Horse: Protest
Sample #B200053581

Dear Mr. March:

You were notified on February 4, 2026, that Protest's A Sample was submitted to Industrial Laboratories ("Industrial") in Denver, Colorado. Industrial reported an Adverse Analytical Finding ("AAF") because it detected Phenylbutazone, a Category S7, Class C Controlled Medication on the Prohibited List and Technical Document. Because you did not request the analysis of Protest's B Sample by the deadline of 5pm CST on February 9, 2026, the B Sample was not analyzed and your opportunity to request the analysis of the B Sample has been waived.

I. Charge and Proposed Consequences

In the initial Equine Controlled Medication ("ECM") Notice letter, HIWU invited you to provide a written explanation regarding Protest's reported AAF by 5pm CST on February 11, 2026. On February 9, 2026, you wrote to HIWU and asked "for an immediate stay, followed by dismissal of any recommended disciplinary action." You asserted that there were errors in the Sample Collection Documentation. HIWU is satisfied that you have committed a Controlled



Medication Rule Violation. This ECM Charge Letter is issued pursuant to Anti-Doping Medication Control (“ADMC”) Program Rule 3348 of the Equine Anti-Doping and Controlled Medication Protocol (the “Protocol”) and constitutes formal notice that HIWU is charging you with a Controlled Medication Rule Violation for the presence of Phenylbutazone in Protest’s Post-Race blood Sample #B200053581, collected following Race 7 at Tampa Bay Downs in Tampa, Florida on January 14, 2026.

Our records indicate that you have no prior Controlled Medication Rule Violations for a Class C Controlled Medication Substance. Therefore, HIWU is seeking imposition of the following proposed Consequences for a first-time violation of ADMC Program Rule 3312 under the Protocol:

- (1) A fine of \$500;
- (2) Assignment of 1.5 penalty points pursuant to ADMC Program Rule 3328;
- (3) Public Disclosure pursuant to ADMC Program Rule 3620; and
- (4) Disqualification of the results of Protest obtained in Race 7 at Tampa Bay Downs in Tampa, Florida, on January 14, 2026, 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.

Because Protest’s results are subject to automatic Disqualification pursuant to ADMC Program Rule 3321(a) of the Protocol, the Responsible Person, the Owner, and HIWU may agree to apply ADMC Program Rule 3321 immediately or any one of them may request that the Internal Adjudication Panel (“IAP”) apply ADMC Program Rule 3321 immediately.

II. Your Options Under the Protocol

A. Rights Provided by ADMC Program Rule 3348(d)

Pursuant to ADMC Program Rule 3348(d), you as the Covered Person, by **5pm CST on February 20, 2026**, can either:

1. Admit the Controlled Medication Rule Violation charged and:



- (i) accept the Consequences proposed by HIWU, in which case HIWU will issue a decision under ADMC Program Rule 3349 of the Protocol; or
2. Deny the Controlled Medication Rule Violation charged and dispute the proposed Consequences at a hearing in accordance with ADMC Program Rule 3361 of the Protocol and the Arbitration Procedures.

B. Further Detail on Resolution Options

1. **Case Resolution Without a Hearing** – Pursuant to ADMC Program Rule 3349(a) of the Protocol, a Covered Person has the right, at any time prior to a Final Decision under the Arbitration Procedures, to agree to admit the violation charged and accede to specified Consequences consistent with the Protocol. In this event, HIWU will issue a Final Decision confirming the commission of the Controlled Medication Rule Violation and setting forth the factual basis for the decision and all the Consequences to be imposed (unless doing so could compromise an ongoing investigation or proceeding) and will send notice of the decision to each Interested Party. Public Disclosure is also required in accordance with ADMC Program Rule 3620 of the Protocol. See enclosed Acceptance and Admission Form.
2. **Proceed to a Hearing on the Merits of the Case** – You have the right to deny the Controlled Medication Rule Violation charged and dispute the proposed Consequences at a hearing before the Internal Adjudication Panel (“IAP”) in accordance with ADMC Program Rule 3361 of the Protocol and Arbitration Procedures codified at Rule Series 7000. You must exercise this option by requesting a hearing on the merits in writing via email sent to me at ggnam@hiwu.org by **5pm CST on February 20, 2026.**

C. Substantial Assistance

Additionally, you also have the option to provide **Substantial Assistance** in an effort to eliminate or reduce your Consequences. Under ADMC Program Rule 3326(a) of the Protocol, HIWU may suspend all or part of the Consequences imposed on a Covered Person in any one case (other than Disqualification of results as required by ADMC Program Rule 3321 of the Protocol) based upon the following:

- (1) The Covered Person provides Substantial Assistance to HIWU, the Horseracing Integrity and Safety Authority (“HISA”), or a State Racing Commission, a criminal authority, or a professional disciplinary body that results in:



- a. HIWU discovering or bringing forward an Anti-Doping Rule Violation or a Controlled Medication Rule Violation by another Covered Person; or
 - b. A criminal or disciplinary body discovering or bringing forward a sport-related criminal offense or the breach of professional or sports rules by another Person, including offenses arising out of a sport integrity violation or sport safety violation, or the violation of any rule or requirement in the Act, and the information provided by the Covered Person providing Substantial Assistance is also made available to HIWU.
- (2) If so requested, HIWU shall allow the Covered Person who seeks to provide Substantial Assistance to provide the information to HIWU subject to a Without Prejudice Agreement.
- (3) If the Covered Person fails to continue to cooperate or fails to provide complete, accurate, and credible Substantial Assistance promised, HIWU shall reinstate the original Consequences. That decision is not subject to review.

Please inform HIWU, in writing at ggnam@hiwu.org by **5pm CST on February 20, 2026**, which option you choose.

If you are willing to admit and accept the violation and Consequences set forth in this ECM Charge Letter, please complete the enclosed Admission of Equine Controlled Medication Rule Violation and Acceptance of Consequences form and return by **5pm CST on February 20, 2026**, by email to ggnam@hiwu.org.

If you choose to deny and challenge the Controlled Medication Rule Violation, you have the right to request a hearing. Please inform HIWU, in writing by email to ggnam@hiwu.org, by **5pm CST on February 20, 2026**, of your request for a hearing (including any request for an expedited hearing) before the IAP.

Note that, if you do not respond to HIWU's assertion of a Controlled Medication Rule Violation or the proposed Consequences by the above-stated deadline you shall be deemed to have waived your right to a hearing, admitted the Controlled Medication Rule Violation charged, and accepted the Consequences specified by HIWU in this ECM Charge Letter without any mitigation of those Consequences.



III. Other Information

Please note that, since this matter involves a Controlled Medication Substance, this letter does not affect Protest's eligibility to participate in a Covered Horserace or Timed and Reported Workout. As a reminder, Protest remains subject to Testing pending the outcome of this matter.

Please note, at any time during or after the Results Management of your matter, you can provide Substantial Assistance in accordance with ADMC Program Rule 3326 of the Protocol and HIWU will evaluate if a dismissal of all or part of any resulting Consequences is appropriate.

By copy of this ECM Charge Letter, HIWU is notifying HISA, the Owner, and the Florida Gaming Control Commission. Pursuant to ADMC Program Rule 7060(b) (Arbitration Procedures), HISA and the Owners are invited to participate as observers in this case. If they accept by sending an acceptance email to HIWU at ggnam@hiwu.org, they will receive copies of the filings in the case. Except as provided in the Protocol, HIWU will not publicly disclose the specifics of this matter until resolution of the case.

Please read this ECM Charge letter carefully and take note of the deadlines set forth in this letter. You have the right to contact an attorney of your choosing in an effort to seek legal advice, should you desire to do so. If you have any questions regarding this letter, please contact me at (816) 601-6897 or ggnam@hiwu.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Geneva N. Gnam', is written over a white background.

Geneva N. Gnam
Litigation Counsel

Encls.: Admission of ECM Rule Violation(s) and Acceptance of Consequences
HISA Covered Person Pro Bono Program

cc (w/ encls.): Carla March, Owner
Florida Gaming Control Commission
John Roach, HISA
Samuel Reinhardt, HISA
Lisa Lazarus, HISA



Admission of Equine Controlled Medication Rule Violation and Acceptance of Consequences

I, William E. March, hereby acknowledge that I have violated Rule Series 3000 Equine Anti-Doping and Controlled Medication Protocol (the “Protocol”) as a result of Phenylbutazone in Protest’s Post-Race blood Sample #B200053581, collected following Race 7 at Tampa Bay Downs in Tampa, Florida on January 14, 2026. I admit that I have committed a Class C Equine Controlled Medication (“ECM”) Rule Violation pursuant to Anti-Doping Medication Control (“ADMC”) Program Rule 3312, (Presence of a Controlled Medication Substance) under the Protocol and I accept the following Consequences:

- (1) A fine of \$500;
- (2) Assignment of 1.5 penalty points pursuant to ADMC Program Rule 3328;
- (3) Public Disclosure pursuant to ADMC Program Rule 3620; and
- (4) Disqualification of the results of Protest obtained in Race 7 at Tampa Bay Downs in Tampa, Florida, on January 14, 2026, 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.

Where fairness requires, the Horseracing Integrity & Welfare Unit (“HIWU”) or the Internal Adjudication Panel (IAP) may establish an installment plan for repayment of amounts due to be paid or reimbursed under the Protocol. The payment schedule may extend beyond any period of Ineligibility imposed upon me.

If any installment subsequently becomes overdue under that plan (i.e., after reinstatement), myself and the Covered Horses under my ownership and/or training may not participate in any Timed and Reported Workout or Covered Horserace until such overdue installments are paid in full. An installment plan can be requested from the HIWU attorney that handled your matter.

I acknowledge and understand that HIWU will communicate the Decision related to my admission of the ECM Rule Violation(s) and my acceptance of the Consequences to the Horseracing Integrity and Safety Authority (“HISA”).

I agree to update HISA’s online registration portal regarding any changes to Protest’s whereabouts information.

I knowingly and voluntarily waive my right to a hearing under the Protocol.



I acknowledge that I have the right to seek my own legal counsel. I acknowledge that I have either consulted with my own counsel regarding the terms and conditions of this agreement, or I knowingly and affirmatively waive the right to do so.

I understand my Covered Horse’s results are subject to automatic Disqualification under ADMC Program Rule 3321(a). Pursuant to ADMC Program Rule 3321(a)(2), I understand that I (as the Responsible Person) and the Owner can request that the Disqualification be processed immediately by HIWU. I further understand that if I would like to have ADMC Program Rule 3321(a)(2) applied in this case, I can send a request by email to HIWU (to Kyle Kremers at kkremers@hiwu.org).

By signing below, I acknowledge that I have read and fully understand this Admission of an ECM Rule Violation and Acceptance of Consequences form and admit to the above violation and accept the resulting Consequences set forth above.

Signature of William E. March

Date

Printed Name of William E. March



COVERED PERSON PRO BONO PROGRAM

The Horseracing Integrity and Safety Authority, Inc. (“HISA”) has established a pro bono program to assist low-income Covered Persons alleged to have committed a Controlled Medication Violation or Anti-Doping Rule Violation under HISA’s Anti-Doping and Medication Control Program (the “Covered Person Pro Bono Program”). The Covered Person Pro Bono Program is designed to match Covered Persons who are financially unable to secure legal representation with volunteer attorneys who have agreed to provide legal services without any expectation of compensation.

DO I QUALIFY FOR A VOLUNTEER ATTORNEY?

To be eligible for a volunteer attorney, you must meet these requirements:

1. Type of Case

- The Horseracing Integrity and Welfare Unit (“HIWU”) has alleged that you committed:
 - A Controlled Medication Violation; or
 - An Anti-Doping Rule Violation.

2. Income and Assets

- Your annual household adjusted gross income is \$75,000 or less; **AND**
- You have no significant liquid assets (Liquid assets include funds that are in the form of cash or can be quickly converted to cash, and investments capable of being quickly converted to cash without significant loss. Liquid assets do not include your residence or retirement account(s)).

HOW DO I APPLY FOR A VOLUNTEER ATTORNEY?

To apply for assistance, you must electronically submit the following to jim.gates@hisaus.org:

1. HISA’s Application for Pro Bono Services

- The application is available online at [Covered-Person-Pro-Bono-Program-Application.pdf \(wengine.com\)](#).

2. Your Most Recent IRS Form 1040 (redacted)

- Social security number(s) must be redacted from this form.

Information and documents submitted in connection with your application will only be used to determine whether you are eligible for pro bono services under this Program. The documents will be destroyed at the conclusion of the eligibility determination.

WHAT HAPPENS TO MY CASE DURING THE APPLICATION PROCESS?

Submitting an application to the Covered Person Pro Bono Program has no impact on your pending case, and all case deadlines and dates remain in place and are not extended by the filing of an application unless an extension is requested and granted by HIWU.

WHAT IF I HAVE QUESTIONS ABOUT THE COVERED PERSON PRO BONO PROGRAM?

Contact HISA/HIWU Ombudsman, Alan Foreman, Alan@ForemanLaw.net.

TAB 9

Monica Pilarski

From: Monica Pilarski
Sent: Friday, February 13, 2026 11:45 AM
To: 'cjmarch1316@gmail.com'
Cc: Geneva Gnam
Subject: HIWU: ECM Charge - Controlled Medication Rule Violation(s) - March, William/Protest
Attachments: 2026-02-13 ECM Charge Letter to March, William re Protest - AAF (w encls.).pdf

Dear Mr. March,

Please see the attached letter regarding an ECM charge. Note the important response deadlines within the letter.

If you have any questions, please contact Geneva Gnam at ggnam@hiwu.org or (816) 601-6897.

Thank you,



Monica Pilarski | HIWU Legal Specialist

Horseracing Integrity & Welfare Unit
Drug Free Sport International

mpilarski@hiwu.org
Cell: (816) 601-5832
4801 Main Street, Suite 350
Kansas City, MO 64112

hiwu.org
drugfreesport.com

TAB 10

Monica Pilarski

From: Monica Pilarski
Sent: Friday, February 13, 2026 11:46 AM
To: 'cjmarch1316@gmail.com'
Cc: Geneva Gnam
Subject: HIWU: ECM Charge - Controlled Medication Rule Violation(s) - March, William/Protest
Attachments: 2026-02-13 ECM Charge Letter to March, William re Protest - AAF (w encls.).pdf

Dear Ms. March,

Please see the attached letter to William March regarding an ECM charge.

If you have any questions, please contact Geneva Gnam at ggnam@hiwu.org or (816) 601-6897.

Thank you,



Monica Pilarski | HIWU Legal Specialist
Horseracing Integrity & Welfare Unit
Drug Free Sport International
mpilarski@hiwu.org
Cell: (816) 601-5832
4801 Main Street, Suite 350
Kansas City, MO 64112
hiwu.org
drugfreesport.com



TAB 11

Monica Pilarski

From: Geneva Gnam
Sent: Thursday, February 19, 2026 11:15 AM
To: Carla March
Cc: Monica Pilarski
Subject: Re: Protest Litigation
Attachments: March/Protest - Document Requests; 2026-02-13 ECM Charge Letter to March, William re Protest - AAF (w encls.).pdf

Mr. March:

As HIWU indicated in the attached email on February 12, 2026, Industrial Laboratories will not separately respond to your inquiries. Any requests for documentation must come through HIWU.

HIWU has requested and will provide a copy of the A Sample Laboratory Documentation Package upon receipt. However, there is no right to discovery or wide-ranging document production under the ADMC Program. Accordingly, apart from the A Sample Laboratory Documentation Package, HIWU will not be providing any of the documentation requested as the requests are outside the scope of ADMC Program Rules.

Your options, as outlined in the February 13, 2026 Charge Letter (also attached) are: 1) admit the violation and accept the Consequences; or 2) deny the Violation and request a hearing. The deadline to either admit the violation or to request a hearing is tomorrow, February 20, 2026 at 5pm CST.

HIWU is not staying or dismissing this matter.

Geneva

Geneva N. Gnam, Esquire | Litigation Counsel
Horsing Integrity & Welfare Unit
Drug Free Sport International
C: (816) 601-6897
E: ggnam@hiwu.org

From: Carla March <cjmarch1316@gmail.com>
Sent: Thursday, February 19, 2026 10:38 AM
To: Geneva Gnam <ggnam@hiwu.org>
Subject: Protest Litigation

Tuesday, February 17, 2026

Geneva N. Gnam, Esq.
Litigation Counsel
Suite 350
4801 Main Street
Kansas City, MO 64112-2749

Re: Answer To: HIWU Letter of February 13, 2026, "pg 4 of 5, Please inform HIWU, in writing t ggnam@hiwu.org by 5pm CST on February 20, 2026, which option you choose.

REQUEST FOR DISMISSAL OF CHARGES

1. A group of wealthy citizens grouped together and created HISA and HIWU. They established a non-government organization to control horse racing in the United States of America. Since 1734, the horse racing industry has been regulated and enforced. The Pennsylvania Horse Racing Association was the first state to regulate the sport. Recently, Senator Mitch McConnell of Kentucky, championed the Federal control of horse racing during the time he suffered from several strokes. Many liberal, animal cruelty groups and unsuccessful trainers and owners backed this movement and ushered in new guidance through the back door. This independent, non-government group, was formed and called HISA and HIWU. Senator McConnell in recent years, suffered from unknown periods where he was unable to talk or reason. He gave up his leadership position in the United States Senate after getting HISA and HIWU off and running. His private backing steered him to the passing

of this UNCONSTITUTIONAL GROUP. They have gathered retired law enforcement employees to enforce their policies, illegal laws and regulatory rules. A trainer charged with a non -government racing infraction, racing in Florida, must fax papers from Florida to Colorado to their office. The United States mail is not part of the skeme. I would not live in Colorado. Florida is my choice. There was nothing wrong with the Florida Division of Pari-Mutuel Wagering. This new private organization was first backed by private money. Race trackers are now paying the organizers salaries through private rules and laws.

2. Please include the names and addresses of the offices of Federal Senators and Congressmen who voted for the passing of the HIWU and HISA. Please mail me copies of all correspondence from and to these government officials before the private laws were passed and since up until the present date.
3. February 4, 2026, HIWU faxed to Trainer William E. March; Re: ECM Notice of Illegal Controlled Medication Rule Violation Covered Horse; Protest, Sample# B200053581.

What person, organization or government entity, if any, collected blood and or urine from the trained horse PROTEST. On the Sample Collection Form, copy enclosed, all signatures are not legible, therefore, not valid nor do they have any formal status derived from the law.

Example; the typed name of Katie Mancini Wales has two different unreadable markings next to the typed name. The additional markings, on the signature lines, are not readable and sometimes misspelled or don't indicate

which person completed the task. Who delivered the blood and urine to the Test Barn? How was it delivered and controlled in delivery to the laboratory in Colorado? The two signatures for the Responsible/Person are not complete, not readable, job and employment unknown and therefore an invalid legal document. If the Test Barn employees had any questions they could have requested the trainers presence in the Test barn with an announcement over the track wide public address system which can be heard in the grandstands and on the backside at Tampa Bay Downs.

4. On February 7, 2026 I requested twelve(12) items from Timothy R. Kruegar, Senior Chemist, REQUEST FOR PRODUCTION(copy attached). No response as of Wednesday, February 18, 2026 at 4:00 P.M. HISA was advised by e-mail.

Kruegar's name appeared on the Certificate Of Analysis, however, the "two separate Certifying Reviewers/Certified Scientists" names are NOT included on the document nor do their signatures appear. The analysis is therefor invalid and no positive can or could have been called. The signatures and names are a requirement to authenticate the alleged actions. How can their chemists findings be correct.? As of this date I have NOT received HISA's Laboratory File requested on February 7, 2026.

5. Sunday, **February 7, 2026** ; I e-mailed Geneva N. Gnam, Esq. my **Response** to ECM Notice of Alleged Controlled Medication Rule Violation of February 4, 2026.

6. Wednesday, February 11, 2025, correction of typo(2026);

Request For Production, to HIWU/HISA. There was no response as of Thursday, February 19, 2026. Instead, they sent the Charge Letter in number 7 below.

7. On February 13, 2026 HIWU E-Mailed Me from, Monica Pilarski; a cover letter **Re: ECM Charge of Controlled Medication Rule Violation, Covered Horse: Protest, Sample #B200053581**, and a ten(10) page information letter from Geneva N. Gnam, Esq. advising me of what they offered as a challenging or agreeing response to their written facts. HIWU/HISA **ignored** my request for an immediate stay and dismissal of any recommended disciplinary action.

CLOSING

Waiting for a response.

Sincerely,

William E. March
Licensed Thoroughbred Horse Trainer
2960 Sutherland Court
Palm Harbor, Florida 34684
(727)365-5222
billmarchtrainer@gmail.com

Cc: Carla March

Geneva N. Gnam, Esq.

HIWU/HISA
Litigation Council Welfare Unit
Horseracing Integrity Welfare Unit
4801 Main Street
Suite 350
Kansas City, MO 64112-2749
ggnam@hiwu.org

Monica Pilarski
HIWU Legal Specialist
mpilarski@hiwu.org

HIWU
binallysis@hiwu.org

Timothy Kruegar
Industrial Laboratories
(303)287-9691
tkruegar@industriallaboratories.net

- .Enc;** Photocopies of #1. Sample Collection Form(back and Front) 01/14/2026
#2. Certificate of Analysis, Jan. 29, 2026

TAB 12

Monica Pilarski

From: Geneva Gnam <ggnam@hiwu.org>
Sent: Tuesday, February 24, 2026 4:08 PM
To: Carla March
Cc: billmarchtrainer@gmail.com
Subject: Re: March/Protest - A Laboratory Documentation Package
Attachments: A Doc Pack. B200053581.pdf

Good afternoon,

Please see attached.

Also - per my attached email from February 19, 2026, the deadline to either admit the violation and accept the Consequences or to deny the Violation and request a hearing was February 20, 2026. HIWU did not receive either election. If we do not receive an admission or a hearing request, you will be defaulted and receive the Consequences outlined in the February 13, 2026 Charge Letter.

Correspondence is sent to the registered HISA Portal email address - which is cjmarch1316@gmail.com. If you wish to update your email address, you may find instructions on how to do so at the following link:

<https://hisaus.org/resources/how-to-update-your-personal-information-step-by-step-for-new-portal>

You may also call HISA at 877-513-2919 for assistance.

Geneva

Geneva N. Gnam, Esquire | Litigation Counsel
Horseracing Integrity & Welfare Unit
Drug Free Sport International
C: (816) 601-6897
E: ggnam@hiwu.org

From: Carla March <cjmarch1316@gmail.com>
Sent: Tuesday, February 24, 2026 1:35 PM
To: Geneva Gnam <ggnam@hiwu.org>
Subject: Re: March/Protest - A Laboratory Documentation Package

Attachment not included, please send any future emails regarding this to: Billmarchtrainer@gmail.com

Thank you

On Tue, Feb 24, 2026 at 12:29 PM Geneva Gnam <ggnam@hiwu.org> wrote:

Mr. March:

Attached please find the A Sample Laboratory Documentation Package for this matter.

Thanks,

Geneva

PUBLIC



Geneva N. Gnam,
Esquire | Litigation Counsel
 Horseracing Integrity &
 Welfare Unit
 Drug Free Sport
 International
ggnam@hiwu.org
 Cell: (816) 601-6897
 4801 Main Street, Suite 350
 Kansas City, MO 64112
hiwu.org
drugfreesport.com



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.

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.

Laboratory Documentation Package

For HIWU Sample ID: B200053581

Laboratory Identification Number: 260115013-001

Analyte Confirmed: Phenylbutazone

Prepared by:

Industrial Laboratories

6116 E. Warren Ave

Denver, CO 80222

At the request of:

Horsereading Integrity and Welfare Unit (HIWU)

4801 Main Street, Suite 350

Kansas City, MO 64112

Adverse Finding:

Atypical Result:

Threshold Limit:

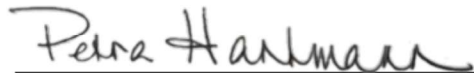
Screening Limit:

Other:

I hereby certify that this Laboratory Documentation Package contains authentic copies of original data, records, and forms.

This Laboratory Documentation Package shall be handled as confidential information, which shall not be disclosed to outside parties, and shall not be reproduced or forwarded, except in full, without the written approval of HIWU.

Information pertaining to unrelated sample information may be redacted.



Petra Hartmann, Lab Director, 2-20-26

Signature / Name / Title / Date

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CHAIN OF CUSTODY INFORMATION

Laboratory Staff

Summary of Sample Handling and Custody

External Chain of Custody Information

Shipping documents

Internal Chain of Custody information

Sample Receiving / Check-In Form

Workorder Summary

Internal Chain of Custody Records

Picture of Sample(s)

Laboratory Staff Involved in Testing / Data Review / Reports

Task	Name	Title	Initials / Signature
Sample Accessioning	Terra Ware	Sample Accessioner	TW <i>Terra Ware (Klein)</i>
Screening Test - Aliquot	Randy Scarzo	Racing Analyst	RS <i>Randy Scarzo</i>
Screening Test - Extraction	Wren Porter	Racing Analyst	WEP <i>Wren Porter</i>
Screening Test - Data Review	Anna Rivest	Racing Chemist	ANR <i>Anna Rivest</i>
Screening Test - Data Approval	Michelle Marchant	Racing Chemist	MCM <i>Michelle Marchant</i>
Confirmation Test	Karissa Renik	Racing Chemist	KNR <i>Karissa Renik</i>
Certifying Scientist	Logan Drill	Racing Chemist	LTD <i>Logan Drill</i>
Certifying Reviewer	Timothy Krueger	Senior Chemist	TRK <i>Timothy R. Krueger</i>
Certificate of Analysis	Timothy Krueger	Senior Chemist	TRK <i>Timothy R. Krueger</i>

INDUSTRIAL LABORATORIES SAMPLE HANDLING SUMMARY

Date	Event	Responsible Party	Comment
1-15-26	Samples Received at Industrial Labs	Airspace	Shipment using official courier. No unscheduled deviations.
1-15-26	Shipping container examined for irregularities	Weston Paslay	Cooler received in good and secure condition. No evidence of tampering.
1-15-26	Accessioning	Terra Ware	Sample received in good and secure condition. No evidence of tampering. Sample information entered in LIMS and laboratory ID number assigned.
1-16-26 to 1-20-26	Screening Test-Blood	Randy Scarzo Wren Porter	Sample screening test suspect for the presence of a prohibited or controlled therapeutic substance - submitted for further analysis.
1-28-26 to 1-29-26	Confirmation Test	Karissa Renik	Sample analyzed in accordance with standard operating procedures for confirmation of the presence of a prohibited or controlled therapeutic medication
1-29-26	Data Review and Certification	Logan Drill Timothy Krueger	Confirmation test data reviewed by two additional reviewers (Certifying Scientist and Certifying Reviewer) to ensure the accuracy and completeness of the data before issuing a final report
1-29-26	Final Report	Timothy Krueger	Report results of confirmation testing in accordance with client requirements

Tracking ID: AT4ZAKXR6G

Order #3299872

Order references:

Internal Reference: FL Tampa Bay:
01/14/26

SHIP FROM:

Tampa Bay Downs
11302 Stable Gate Lane
Tampa, FL 33626
United States of America

Dimensions: 24.0x15.0x15.0 L x W x H,
18.0 LBS

Commodity: Exempt Animal
Specimen

Dangerous Goods: No

Pickup Instructions: Call POC for
pickup instructions 1 hour prior to scheduled pickup.



QR CODE: ATG3AXHZEW
Piece 1 of 1

SHIP TO:

Industrial Labs
6116 East Warren Avenue
Sample Receiving
Denver, CO 80222
United States of America

Delivery Instructions: ***NO PICK & HOLDS*** Once recovered,
this shipment must be delivered direct - no stops in between. Upon
arrival, please ring the doorbell located to the right of the main
entrance for access. ...

QDT: Jan 15, 2026 12:50 MST

For questions or information about this shipment, please call 855-
524-7772

PUBLIC



Shipment Check-In Form

All information provided below pertains to all samples received in a shipment.

Form # FM-DTS-0027.5

Effective Date: 11/24/2025

Page 1 of 1

Jurisdiction / Event Name: HIWU TAM		
Date received: 1-15-26	Courier: AirSpace	Collection Date(s): 1-13 to 14-2026
Time received: 1:14 am/pm	Second Shipping Container? Y <input checked="" type="radio"/> N (If yes, fill out second form)	
Shipping Identifying Information		Security of Container*
Tracking number: Tracking Print Out <input type="checkbox"/> Original <input checked="" type="checkbox"/>		Strip seal #: S003376
IL cooler ID: 24-0210		Pad lock: Y/N Locked on arrival: Y/N/NA
Client cooler ID: NA		Evidence tape: Y/N Intact on arrival: Y/N/NA
Other packaging: NA		Other seal: NA
Comments: NA		Comments: NA
Container Integrity: Good <input checked="" type="checkbox"/> Communication Needed <input type="checkbox"/>		Strip Seal Intact: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If No - Photo <input type="checkbox"/> N/A <input type="checkbox"/>
Shipment contains following sample types*		
Blood samples: Y/N	Urine samples: Y/N	Other: Y/N
Evidence Tape: Y/N	Evidence Tape: Y/N	Evidence Tape: Y/N
Tape Intact: Y/N/NA	Tape Intact: Y/N/NA	Tape Intact: Y/N/NA
Other: NA	Other: NA	Other: NA
Comments: NA		
All materials removed from shipping container: Y <input checked="" type="radio"/> N		
Sample temperature upon receipt: <input type="checkbox"/> Frozen <input type="checkbox"/> Thawed <input checked="" type="checkbox"/> Cold <input type="checkbox"/> Warm		
Suspicious odors, contaminants, & markers of sample degradation recorded above & in LIMS? <input checked="" type="checkbox"/>		
Sample descriptions and ID#'s verified against submission form, or discrepancies recorded above? <input checked="" type="checkbox"/>		
All samples were stickered with lab ID? <input checked="" type="checkbox"/>		
Sample handling procedures followed? <input checked="" type="checkbox"/>		

*Individual client requirements may vary.

Analyst Signature Wester Paslay Date 1-15-26

Analyst Signature [Signature] Date 1/15/26

The Industrial Laboratories Company, Inc.
6112 E. Warren Ave.
Denver, CO 80222

Industrial Laboratories Company, Inc. **Thursday, January 15, 2026** **Work Order Summary**

Horsing Integrity & Welfare Unit
 Mary Scollay, DVM - Chief of Science
 4801 Main St
 Suite 350
 Kansas City, MO 64112

Client ID:

HIWU ✓

Origin:

Tampa Bay ✓

Due Date:

1/22/2026 ✓

Comments:

Seal #:5003376 ✓ ✓

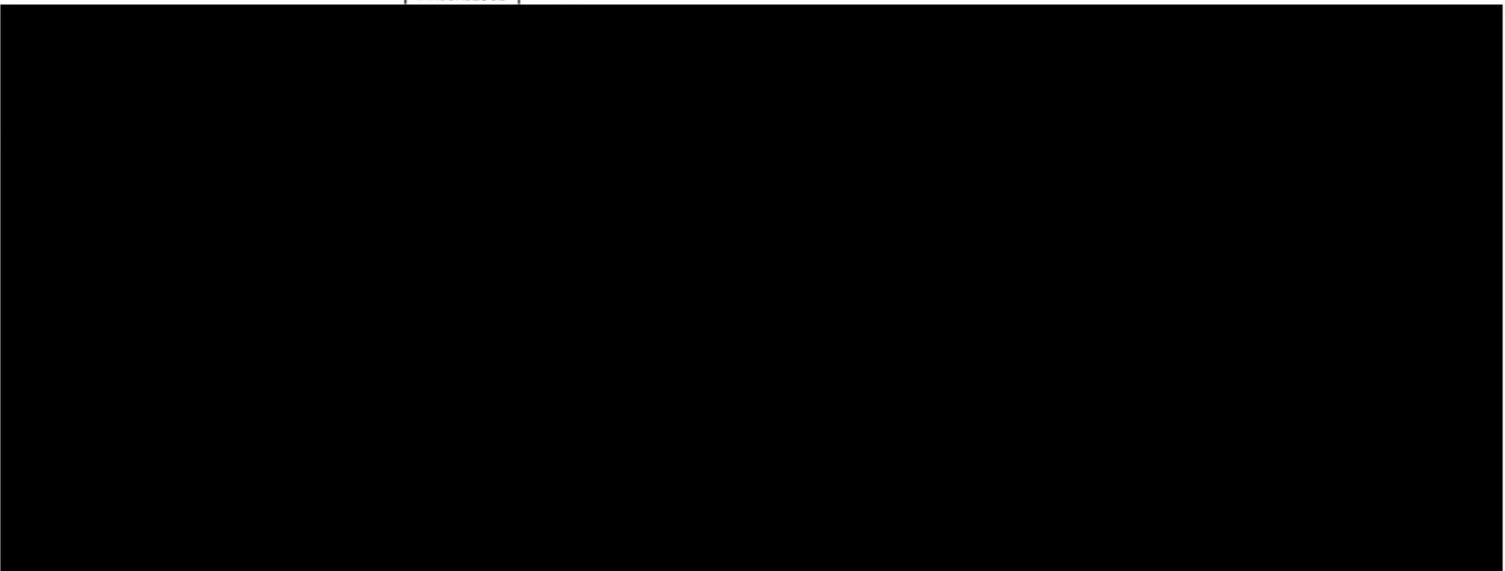
Work Order

260115013

Log-In by: tware ✓

XML File/UID #: 11008_TAM-PR-01142026_01142026_165534129 ✓

Sample Code	Client Sample ID	Test Panel / Code	Sample Type	Collect Da	Breed/Species	Gender	Auth. Meds	Test Type	Comments
260115013-001	200053581	HISABLR TARSCRURINE TARSCRBLOOD	BLOOD & URINE	1/14/26	Equine-TB	GELDING	Lasix	Post-Race	



Test Breakdown:

Test Summary:

SampleCode: 260115013-001

Client ID: 200053581

of Containers: 3B / 1BS / 1U / 1US

<u>Event Date</u>	<u>Event Time</u>	<u>Start Location</u>	<u>Analyst</u>	<u>End Location</u>	<u>Comment</u>	<u>SampleType</u>
1/15/2026	13:14	Airspace	tware	Lab	Received	All
1/15/2026	15:28	Lab	TWARE	Secure Storage 1-RF	Moved to storage	Blood & Urine
1/15/2026	15:30	Lab	TWARE	Secure Storage 2-WI	Moved to storage	Blood Split & Urine Split
1/16/2026	07:22	Secure Storage 1-RF	RSCARZO	Lab	Aliquot initial testing for target screen	Blood Only
1/16/2026	10:28	Lab	SAZZARITI	Secure Storage 2-WI	Moved to storage	Blood Only
1/16/2026	12:55	Secure Storage 2-WI	RSCARZO	Lab	Re-aliquot initial testing for target screen	Blood Only
1/16/2026	14:09	Lab	LARCHIBALD	Secure Storage 2-WI	Moved to storage	Blood Only
1/28/2026	11:07	Secure Storage 2-WI	KRESNIK	Suspect Storage	Suspect storage - pending confirmation	All
1/28/2026	11:08	Suspect Storage	KRESNIK	Lab	Confirmation test Phenylbutazone	Blood Only
1/28/2026	14:15	Lab	KRESNIK	Suspect Storage	Suspect storage - pending confirmation	Blood Only
1/29/2026	09:35	Suspect Storage	KRESNIK	Positive Storage	Confirmed Phenylbutazone	All

KNR / 1/29/26



CONTROL NO. 8939819

Remove this perforated receipt and retain for your records.

Case #: 260115013-001 Item #: 200053581

Description: 3B/1U Bag Sealed By: _____

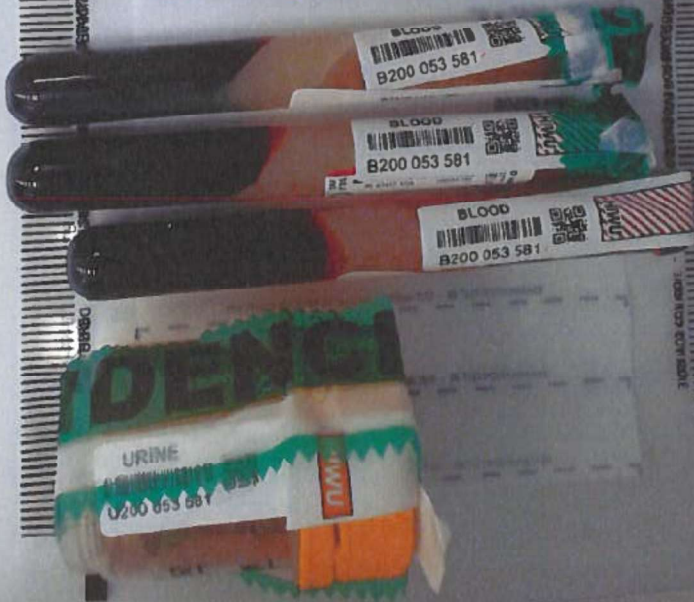
Date Sealed: _____ Time Sealed: _____ AM PM

CONTROL NO. 8939819

- INSTRUCTIONS FOR USE:
1. Remove perforated receipt and retain for your records.
 2. Fold ActiSeal Security Tape (AST) from bag opening. Remove release liner to expose adhesive.
 3. Press adhesive flap down onto ActiSeal and completely close BAG. BAG MUST BE SEALED.

Tampa Bay ✓

260115013-001 ✓ 200053581 ✓



✓

✓

✓

✓

CONTROL NO. 8939819

Remove this perforated receipt and retain for your records.

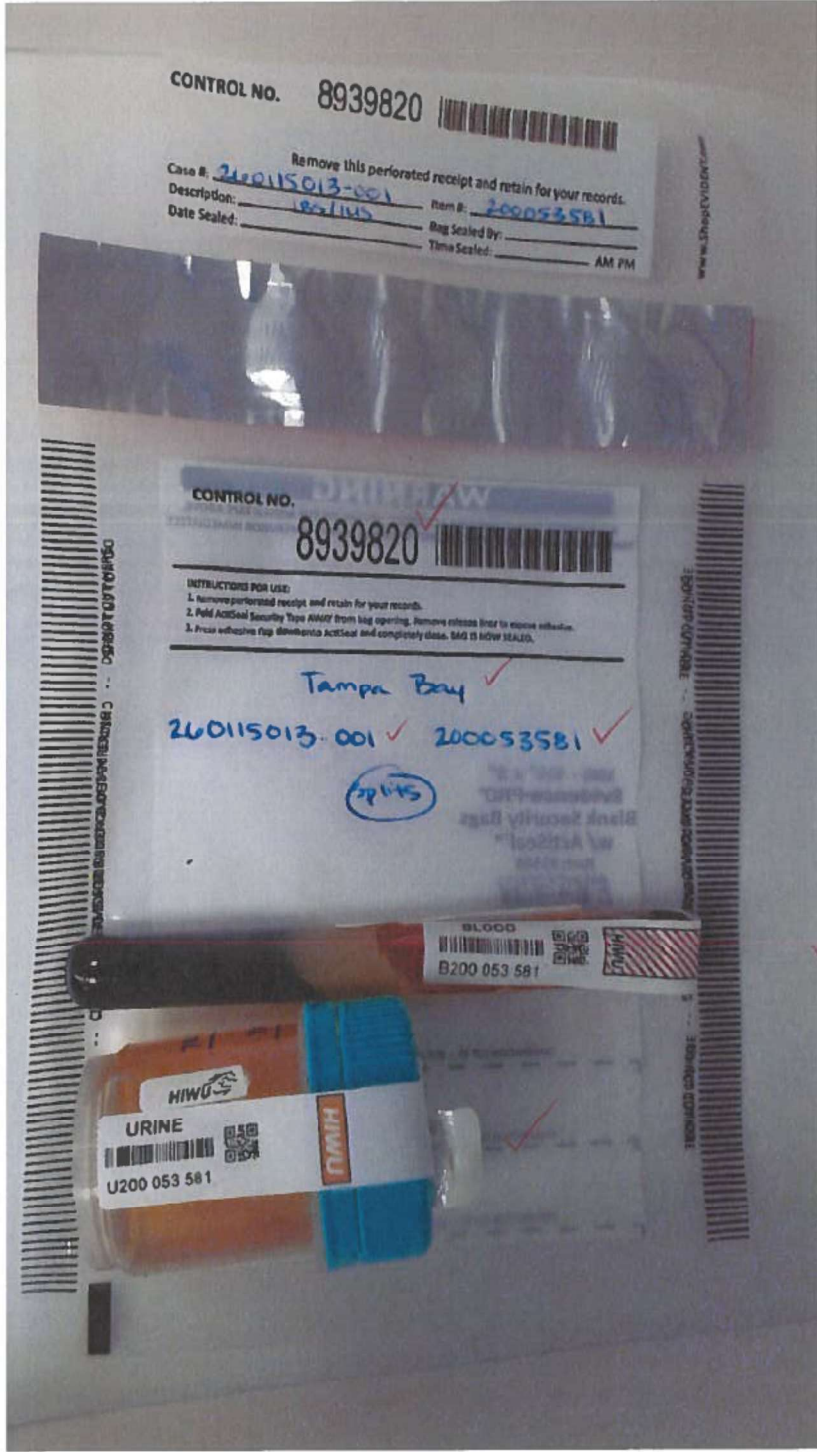
Case #: 260115013-001 ✓ Item #: 200053581 ✓

Description: 3B/1U ✓ Bag Sealed By: KNR ✓

Date Sealed: 1/29/26 ✓ Time Sealed: 9:32 AM PM

www.ShopEVIDENT.com

KNF ✓
1/29/26



CONTROL NO. 8939820

Remove this perforated receipt and retain for your records.

Case #: 260115013-001 Item #: 200053581

Description: 185/11/26 Bag Sealed By: KNF

Date Sealed: 1/29/26 Time Sealed: 9:32 AM PM

www.ShopEVIDENT.com

TESTING / ANALYTICAL DATA

Screening:

Analytical Batch Traceability Worksheet –
Screening Test

LC-MS/MS Chromatograms – Screening Test

Screening Test Result Documentation

Confirmation:

Method Summary

Acceptance Criteria

Positive Control Preparation Documentation

Instrument Check / Testmix


Analytical Batch Traceability Worksheet

Analytical Sequence Table

LC-MS/MS Data Summary Table

LC-MS/MS Ion Fragment Chromatograms

LC-MS/MS Ion Abundance Ratios

	DTS Target Screen Extraction and Analysis Traceability Worksheet		
	Form # FM-DTS-0042.7	Effective Date: 08/28/2025	Page 1 of 1

SOLID PHASE EXTRACTION IL-DTS-W-012

DUE DATE(S): 1/2/26

Matrix (circle): BLOOD URINE

Batch Number(s): PB24066

Positive Control Number(s): P-26-0180

Date of Sample Extraction: 1/16/26

PCN of SPE Plates/Columns: P23-0710

Samples aliquoted by/on: RJS 1/16/26

Start Time: 1:00pm End Time: 2:01pm

Enzyme Hydrolysis Temp: RT

Start Time: 15:10 End Time: 15:35

Extraction performed by: WEP

Start Time: 15:35 End Time: 17:15

SPE Tecan (circle): DTS-E-0199; DTS-E-0204

PPM (circle): DTS-E-0046; DTS-E-124; DTS-E-125; DTS-E-130

Dry Down (circle): DTS-E-0047; DTS-E-0131; DTS-E-0082; DTS-E-0264; DTS-E-0265

ASN/PCN/SCN of standards used: ASN25-576E, 25-564C, 25-474G, 25-4766, 25-476D, 25-576

PCN/SCN of solutions used:

Control material: P25-0580B

MeOH: P25-0645A

pH 4.5 acetate buffer: SR26-0004

pH 6 Phosphate buffer: SR26-0007

Enzyme: P25-0567D

(78:20:1:1): SR26-0047

pH verified: ✓

Reconstitution solvent (9:1): SR25-1195

Pipette numbers used for extraction: PI-087, 134, 132, 030, 097, 114, 088

All sample aliquots were secure through the extraction process (initial/date): WEP/1/16/26

Reviewer (initial/date): LE 01/16/26

INSTRUMENTAL ANALYSIS

Instrument Number: 4500 #10

Loaded by (initial/date): WEP/1/16/26

SCN Mobile Phase A: SR26-0028

ASN of Test mix: 25-566

SCN Mobile Phase B: SR26-0036A

System Suit meets acceptance criteria: ✓

Method Used:

✓ Target Screen (IL-DTS-M-003)

Processed by (initial/date): ANR 1/20/26

N/A Other (specify): N/A

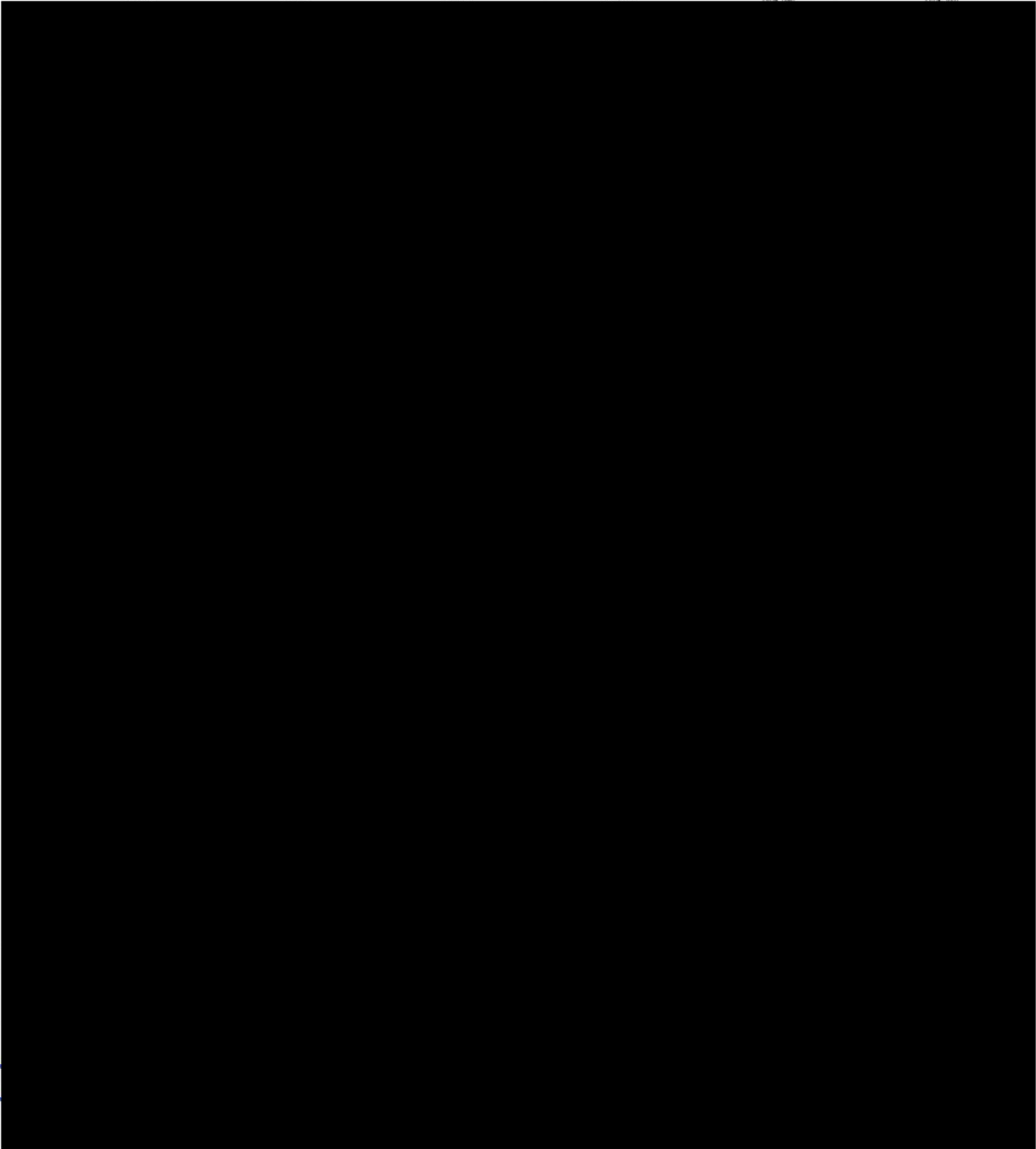
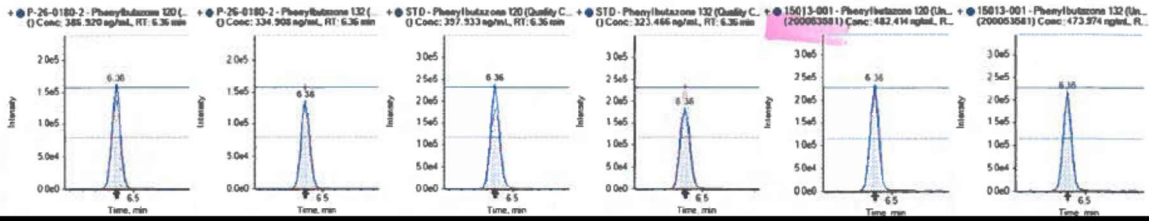
Processed by (initial/date): N/A

Results transferred by (initial/date): ANR 1/20/26

Reviewed by (initial/date): MEM 1/22/26

(PBZ) at a level greater than the screening limit, based on comparison of ion m/z 120, in the sample against the positive control sample. The estimated amount of phenylbutazone (PBZ) exceeded the screening limit and further analysis was deemed appropriate.

Petra Hartmann, Lab Director, 2-20-26



Screening Worksheet

Batch Due On : 1/2/2026

Test : TARSCRBLOOD
Batch : PB24066
Number of samples: 67

J	Lab ID	Sample ID	Sample Type	Track	Gender	Allowed Meds	Test Type	Species	Due date	Containers	Comments	Result
[Redacted Content]												

J	Lab ID	Sample ID	Sample Type	Track	Gender	Allowed Meds	Test Type	Species	Due date	Containers	Comments	Result
H	260115013-001	200053581	BLOOD & URINE	Tampa Bay	GELDING	Lasix	Post-Race	Equine-TB	1/22/2026	3B / 1BS / 1U / 1US		Phenylbutazone



Summary of Confirmation Method:

Phenylbutazone in Blood

Method IL-DTS-M-012 / This method has been verified as being suitable for this analyte / No Deviations Noted

Enzyme Hydrolysis of sample: **No**

Base Hydrolysis of sample: **No**

Sample amount used for confirmation analysis: **2 aliquots 1 mL**

Qualitative Test: No Quantitative Test: **Yes** Internal Standard used: **Phenylbutazone ¹³C₁₂**

Sample Preparation:

Description of sample extraction / preparation:

Add 1 mL of sample, 50 mg NaCl, 2 mL of acetonitrile. Vortex and centrifuge. Transfer 30 µL of organic layer into autosampler vials containing 1 mL of 4:1 LCMS H₂O and LCMS MeOH, with 0.1% formic acid and 1 mM ammonium formate. Cap and mix thoroughly.

Instrumental Analysis: LC-MS/MS (AB Sciex QTRAP 4500 with Shimadzu HPLC)

Description of instrument set-up:

Precolumn	Restek Pinnacle DB C8 Guard Cartridge, 10 x 2.1 mm, 5 µm		
Column	Agilent Zorbax SB-C18, Narrow Bore RR, 2.1 x 75 mm, 3.5 Micron		
Mobile Phase A	LC-MS Water with 1 mM Ammonium Formate and 0.1% Formic Acid		
Mobile Phase B	LC-MS Methanol with 1 mM Ammonium Formate and 0.1% Formic Acid		
Flow Rate	0.5 mL/min	Monitored Ion Transitions	
Run Time	5.0 min	Phenylbutazone- ¹³ C ₁₂	321.1 126.1
Column Oven Temp	40 °C	Phenylbutazone 120	309.1 120.1
Injection Volume	3 µL	Phenylbutazone 188	309.1 188.1
Ion Source	Turbo Spray	Phenylbutazone 160	309.1 160.1
Experiment 1	sMRM	Phenylbutazone 211	309.1 211.1
Polarity	Positive		

Control Information:

Positive Controls: 2 aliquots of blank blood were supplemented with reference standard phenylbutazone for final concentrations of 0.3 µg/mL and 1 µg/mL.

Internal standard, phenylbutazone- ¹³C₁₂ was added to all samples and controls for a final concentration of 1 µg/mL.

Reference Material:

P23-0402: Phenylbutazone Crystalline, Sigma-Aldrich, Part # P8386, Lot # MKCT2155

P25-0386: Phenylbutazone-¹³C₁₂, MedChem Express, Part # HY-B0230S2, Lot # M001535



Acceptance criteria for QUALITATIVE LC-MS/MS data:

References: Association of Official Racing Chemists (AORC) MS Criteria, March 2024 and all applicable accreditation requirements

Requirement for Confirmation	Pass <input checked="" type="checkbox"/>	Fail <input checked="" type="checkbox"/>
Test Mix for Instrument suitability: Six replicates. Acceptable peak shapes, RSD < 10%, All peaks quant w/in ± 20%.	<input checked="" type="checkbox"/>	
Retention time: ± 1% relative retention time (RRT), or ± 1% or 6 seconds absolute retention time (RT).	<input checked="" type="checkbox"/>	
Chromatography: Peak shape acceptable. Minimum 10:1 signal to noise ratio for the quantitative ion and at least one qualifier ion, and minimum 3:1 for all remaining qualifier ions.	<input checked="" type="checkbox"/>	
Ion Abundance ratios: ± the sum of 20% relative abundance and an additional 5% absolute abundance.	<input checked="" type="checkbox"/>	
Positive Control response: Positive result / meets criteria shown above	<input checked="" type="checkbox"/>	
Negative Control response: Absence of diagnostic ions in negative control <u>OR</u> Area count < 10% of positive control	<input checked="" type="checkbox"/>	

Qualitative Confirmation Analysis Worksheet

Date Received:	Lab No:	Sample No:	Sample Type(s):	Origin:	Collection Date:	Authorized Medications:
1/15/2026	260115013-001	200053581	BLOOD & URIN	Tampa Bay	1/14/2026	Lasix

Due Date: 1/29/2026 Screening Batch(es): PB24066 TARSCRBLOOC PB24069 TARSCRURINE
Compound(s) Submitted: Phenylbutazone 482ng/mL
Threshold: Confirm
Comments:

Sample Amount Available for Testing (mls):

Blood Tube 1: 2 mL ✓
Blood Tube 2: 3 mL ✓
Blood Tube 3: 3 mL ✓
Urine: N/A pH: N/A
Other Sample: 3 mL ✓ Specific Gravity: N/A
Sample Condition: Acceptable/Secure ✓

Accessioning:

Analyst:	kresnik ✓
Sample Type / Tube #:	Blood / 001B ✓
Amount Used:	2 x 1000 µL ✓
Pipette #:	PI-140 ✓
Dilution:	

Method Code:	IL-DTS-M-012 ✓
Hydrolysis:	No Hydrolysis ✓
Positive Control / Batch Number:	P-26-0282 ✓
Final Detection By:	LC-MS/MS ✓
Date of Instrumental Analysis:	1/28/2026 ✓
Analyst:	kresnik ✓

Final Result: Phenylbutazone confirmed in blood.

For All Medical Violations:
Is the Chain of Custody for this Sample Intact: Yes ✓
Evidence Bag Number: 8939819, 8939820 ✓

1/29/26

Analyst

(I hereby certify that I have followed all quality requirements and scientific guidelines related to this type of analysis, and that the information listed above is accurate)

1/29/26

Certifying Scientist

(I hereby certify that I have reviewed this analysis for errors/deviations/inconsistencies and that this result is accurate)

1-29-2026

Certifying Reviewer

(I hereby certify that I have reviewed this analysis for errors/deviations/inconsistencies and that this result is accurate)

The Industrial Laboratories Company, Inc.

KNR
1/29/21

Pos. Control #	Sample Number	No. of Samples	Extraction Method	Drug(s) Used	Matrix	Spike Vol	Matrix Vol	Final Conc.	ASMPCN/SCN	Standard Expiration	Standard Material PCN	Initial Date
P-25-0282	260115013-001	2	L-OTS-M-012 1 mL sample, 50 mg NaCl, 2 mL ACN Vortex, Centrifuge, Transfer 30 µL to 1 mL 4:1 recon	Phenybutazone I.S. Phenybutazone 13C12	Blood	30 µL 10 µL	1 mL 1 mL	0.3 µg/mL 1 µg/mL	ASN26-04DB 10 µg/mL ASN26-04DA 100 µg/mL ASN25-440C 100 µg/mL	1/21/2027 1/21/2027 7/2/2026	P23-0402 P23-0402 P25-0388A	 KNR 1/28/2026

KNR / 1/29/26




Data File	SB Test Mix 4500-3.wiff	Result Table	20260128 SB Test Mix.rdb
Acquisition Date	1/28/2026 9:36:47 AM	Algorithm Used	MQL
Acquisition Method	SB testmix.dam	Instrument Type	AB SCIEX QTRAP 4500
Project	Routine Analysis\202601	Instrument Name	4500-3

Standard Summary at Concentration: 1 ng/mL

Analyte Peak Name (MRM Transition)	Mean Calculated Conc (ng/mL)	Std. Deviation (ng/mL)	% CV	Number of Values Used	Mean Accuracy (%)
Timolol (TIC)	1.000	0.007	0.71	6	100.00
Furosemide (TIC)	1.000	0.011	1.07	6	100.00
Flunixin (TIC)	1.000	0.005	0.48	6	100.00

Standard Details

Analyte Peak Name	Sample Name ([Index])	Calculated Conc (ng/mL)	Analyte RT (min)	Accuracy (%)
Timolol	20260128-4 (0)	0.991	0.88	99.1
Furosemide	20260128-4 (0)	1.010	1.89	101.0
Flunixin	20260128-4 (0)	1.000	3.73	100.0
Timolol	20260128-5 (1)	1.000	0.88	100.0
Furosemide	20260128-5 (1)	1.010	1.88	101.0
Flunixin	20260128-5 (1)	1.010	3.72	101.0
Timolol	20260128-6 (2)	1.000	0.87	100.0
Furosemide	20260128-6 (2)	0.996	1.88	99.6
Flunixin	20260128-6 (2)	0.995	3.73	99.5
Timolol	20260128-7 (3)	1.010	0.88	101.0
Furosemide	20260128-7 (3)	1.010	1.88	101.0
Flunixin	20260128-7 (3)	0.994	3.73	99.4
Timolol	20260128-8 (4)	0.995	0.88	99.5
Furosemide	20260128-8 (4)	0.985	1.88	98.5
Flunixin	20260128-8 (4)	1.000	3.73	100.0
Timolol	20260128-9 (5)	0.996	0.88	99.6
Furosemide	20260128-9 (5)	0.992	1.88	99.2
Flunixin	20260128-9 (5)	1.000	3.73	100.0

 Industrial Laboratories	DTS General Confirmation Analytical Batch Traceability Worksheet		
	Form # FM-DTS-0034.3	Effective Date: 8/4/2025	Page 1 of 1

Batch Name: 2026 0128 Phenylbutazone Blood Confirm

Positive Control/Batch Number: P-26-028Z

Lab ID #(s) included in Batch: 26015013-001, [REDACTED]

Comments: _____

Extraction Traceability

ASN/SCN of Standards Used: ASN25-440C, ASN26-040B, ASN26-040A

Blank Matrix: P25-0625 Pipette(s) Used: PI-119, PI-140

All reference standards checked for expiration before use (Initial/Date): KNR 1/28/26

No Hydrolysis: Enzyme Hydrolysis: Base Hydrolysis:

Hydrolysis Reagent(s): _____	
Oven ID: _____	Set Temperature (± 5 °C): _____
Date/Time In: _____	Date/Time Out: _____

Extraction Reagents: P25-0586, P24-0792, P25-0557, SP25-1194

Extraction Equipment: N/A

All sample aliquots were secure through the extraction process (Initial/Date): KNR 1/28/26

Karion R. Analyst 1/28/26 Date

Analysis Traceability

System Suitability ASN: ASN25-5666 Test Mix Meets Acceptance Criteria: Yes No

Mobile Phase A: SP26-0028F Mobile Phase B: SP26-0036D

Karion R. Analyst 1/28/26 Date

KNR
1/29/26

Printing Time: 6:54:51 AM
Printing Date: Thursday, January 29, 2026

Project: D:\Analyst Data\Projects\Routine Analysis\202601 Batch:20260128 Phenylbutazone Blood Confirm Tab:Sample Set:SET1 AcqMethod:Phenylbutazone in Blood.dam

Sample

	Sample Name	Rack Code	Rack Position	Plate Code	Plate Position	Vial Position	Data File	Inj. Volume (µl)
1	Solvent	Rack Order (1	1.5 mL Vial	4	23 ✓	20260128 Phenylbutazone Blood Confirm	3.000
2	Solvent	Rack Order (1	1.5 mL Vial	4	23 ✓	20260128 Phenylbutazone Blood Confirm	3.000
3	Blank	Rack Order (1	1.5 mL Vial	4	24	20260128 Phenylbutazone Blood Confirm	3.000
4	Negative	Rack Order (1	1.5 mL Vial	4	25	20260128 Phenylbutazone Blood Confirm	3.000
5	260115013-001-1	Rack Order (1	1.5 mL Vial	4	26	20260128 Phenylbutazone Blood Confirm	3.000
6	260115013-001-2	Rack Order (1	1.5 mL Vial	4	27	20260128 Phenylbutazone Blood Confirm	3.000
7	Wash	Rack Order (1	1.5 mL Vial	4	23 ✓	20260128 Phenylbutazone Blood Confirm	3.000
8								
9								
10	Wash	Rack Order (1	1.5 mL Vial	4	23 ✓	20260128 Phenylbutazone Blood Confirm	3.000
11	P-26-0282-1	Rack Order (1	1.5 mL Vial	4	30	20260128 Phenylbutazone Blood Confirm	3.000
12	P-26-0282-2	Rack Order (1	1.5 mL Vial	4	31	20260128 Phenylbutazone Blood Confirm	3.000
13	STD	Rack Order (1	1.5 mL Vial	4	32	20260128 Phenylbutazone Blood Confirm	3.000

Collected by: n/a
Electronic Signature: no
Operator: 4500-3

KNR
1/29/26

Industrial Laboratories
MRM Confirmation Summary Report

Created with Analyst Reporter
Printed: 1/29/2026 8:28:30 AM

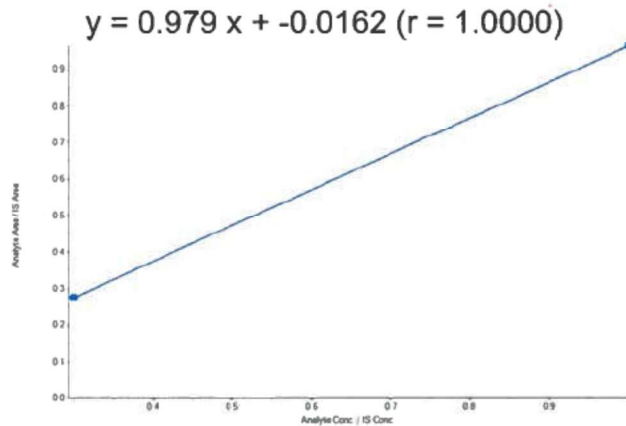
Data File	20260128 Phenylbutazone Blood Confirm.wiff	Result Table	20260128 Phenylbutazone Blood Confirm.rdb
Acquisition Date	1/28/2026 3:47:58 PM	Algorithm Used	MQL
Acquisition Method	Phenylbutazone in Blood.dam	Instrument Type	AB SCIEX QTRAP 4500
Project	Routine Analysis\202601	Instrument Name	4500-3

Results Summary

Phenylbutazone 120 (309.100/120.100 Da)

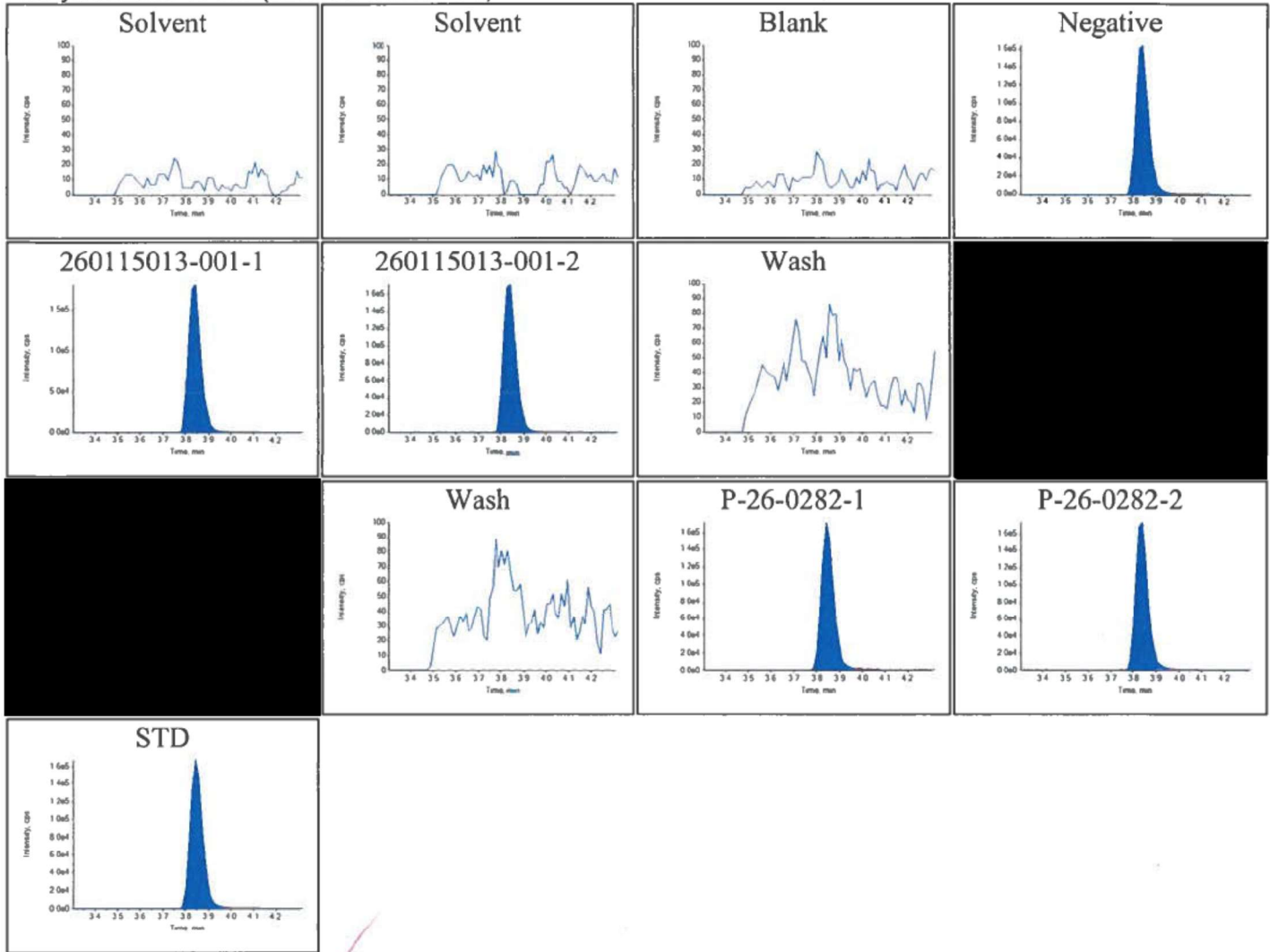
IS: Phenylbutazone-13C12

Sample Name	Sample Type	Use Record	Analyte Peak Area	IS Peak Area	Measured Conc. (ug/mL)	Dilution Factor	Calculated Conc. (ug/mL)	Target Conc. (ug/mL)	Accuracy %
Solvent	Unknown	-	0.00e+00	0.00e+00	Value	1.000	#DIV/0	N/A	-
Solvent	Unknown	-	0.00e+00	0.00e+00	Value	1.000	#DIV/0	N/A	-
Blank	Unknown	-	0.00e+00	0.00e+00	Value	1.000	#DIV/0	N/A	-
Negative	Unknown	-	0.00e+00	6.21e+05	Value	1.000	No Peak	N/A	-
260115013-001-1	Unknown	-	2.39e+05	6.71e+05	0.38	1.000	0.381	N/A	-
260115013-001-2	Unknown	-	2.35e+05	6.41e+05	0.39	1.000	0.391	N/A	-
Wash	Unknown	-	0.00e+00	0.00e+00	Value	1.000	#DIV/0	N/A	-
Wash	Unknown	-	0.00e+00	0.00e+00	Value	1.000	#DIV/0	N/A	-
P-26-0282-1	Standard	Yes	1.73e+05	6.23e+05	0.30	1.000	0.300	0.300	100.0
P-26-0282-2	Standard	Yes	6.17e+05	6.41e+05	1.00	1.000	1.00	1.00	100.0
STD	Unknown	-	1.73e+05	6.07e+05	0.31	1.000	0.308	N/A	-



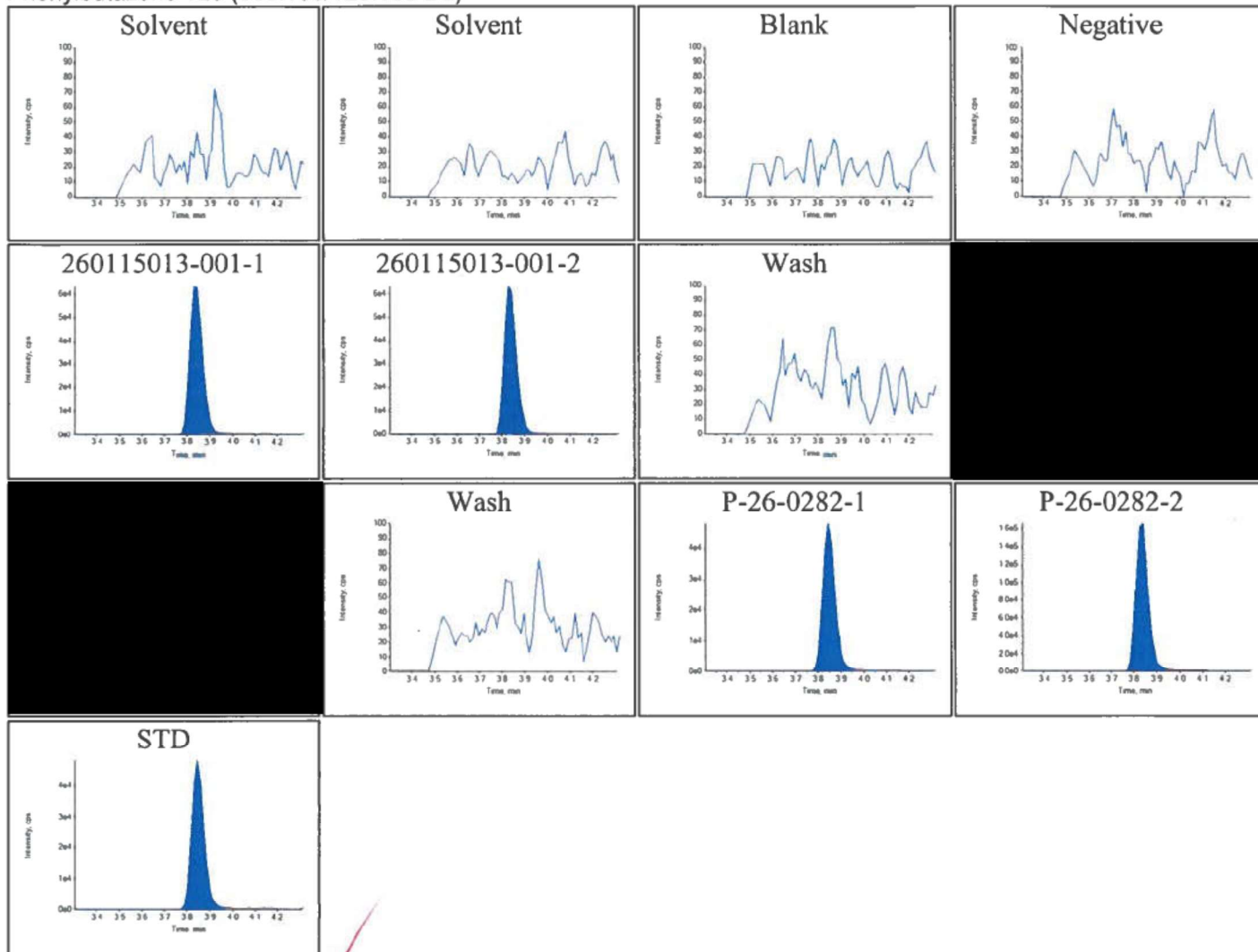
IS Peak Review

Phenylbutazone-13C12 (321.100/126.100 Da)



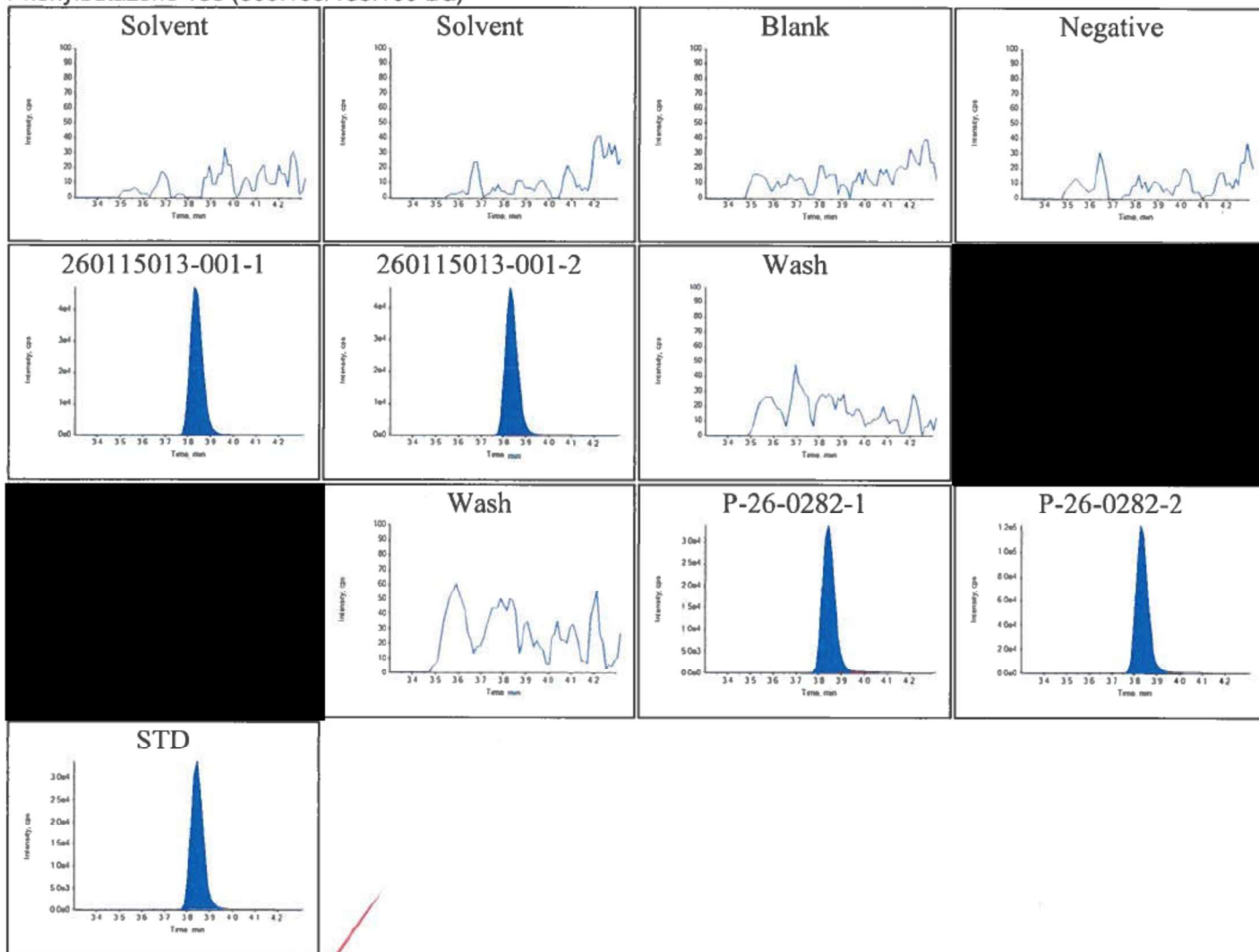
Peak Review

Phenylbutazone 120 (309.100/120.100 Da)



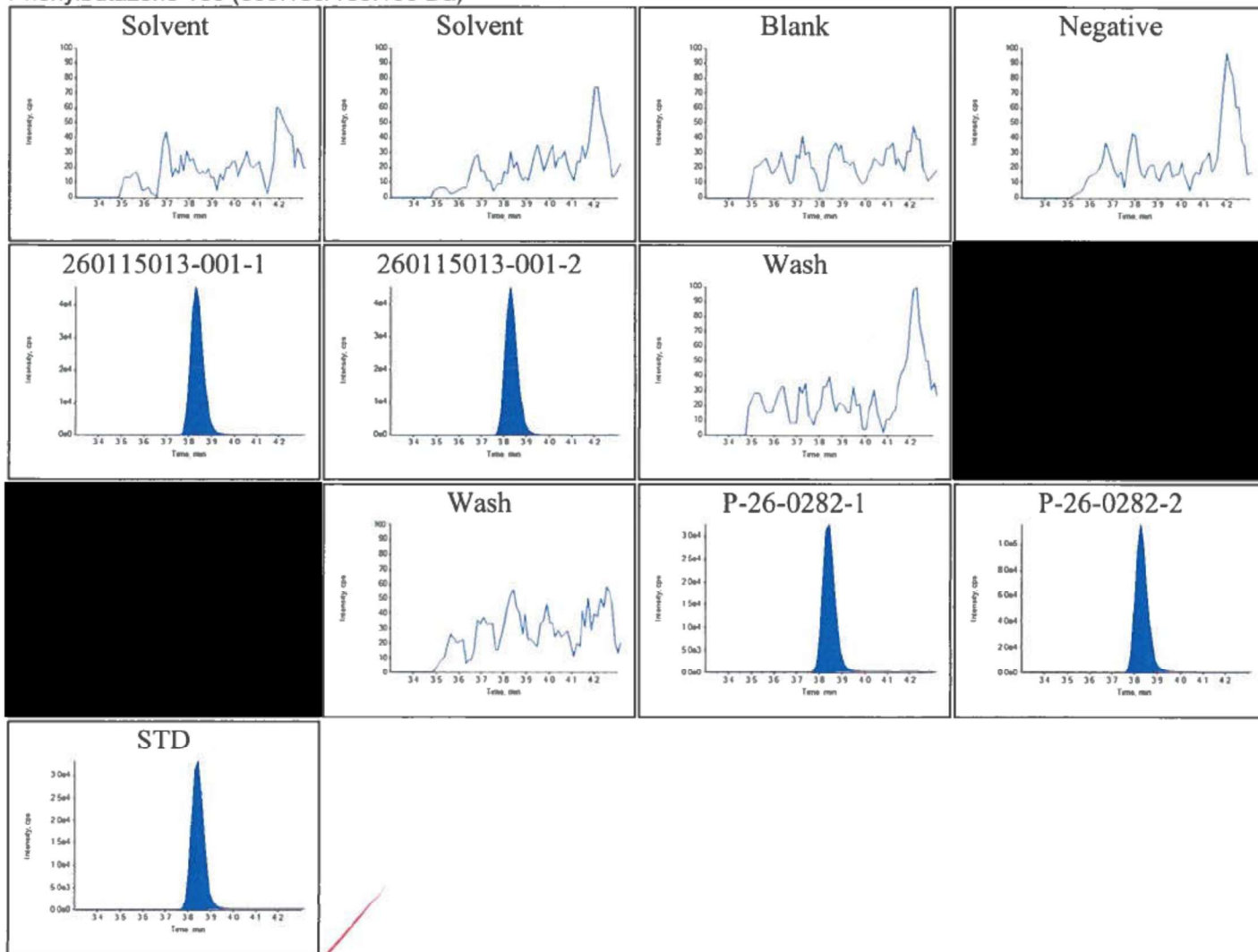
Peak Review

Phenylbutazone 188 (309.100/188.100 Da)



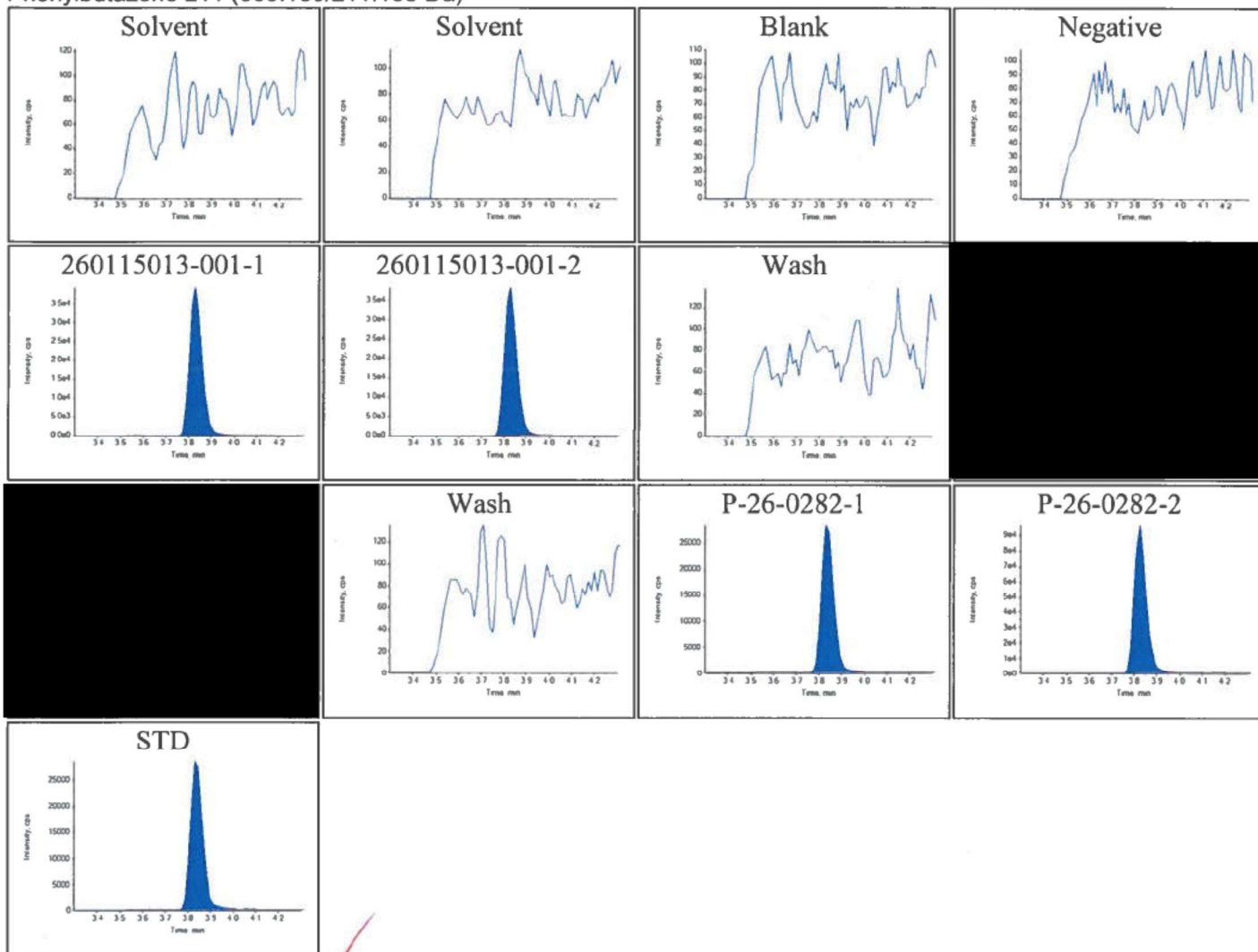
Peak Review

Phenylbutazone 160 (309.100/160.100 Da)



Peak Review

Phenylbutazone 211 (309.100/211.100 Da)



KWR
1/29/24

Industrial Laboratories
MRM Ion Area Ratios / Retention Time Summary Report

Created with Analyst Reporter
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Data File	20260128 Phenylbutazone Blood Confirm.wiff	Injection Volume	3 µL
Result Table	20260128 Phenylbutazone Blood Confirm.rdb	Instrument Name	4500-3
Acquisition Date	1/28/2026 3:47:58 PM	Project	Routine Analysis\202601
Acquisition Method	Phenylbutazone in Blood.dam	Algorithm Used	MQL

Solvent						
Analyte Peak Name	Record Modified	Analyte Peak Area	Analyte RRT (Acceptance Range)	Calculated Ion Ratio (Acceptance Range)	Ratio OK	RRT OK
Phenylbutazone 120 (309.100/120.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	N/A	N/A	
Phenylbutazone 188 (309.100/188.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	0.00% (52.43% – 91.14%)		
Phenylbutazone 160 (309.100/160.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	0.00% (49.52% – 86.78%)		
Phenylbutazone 211 (309.100/211.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	0.00% (41.22% – 74.33%)		

Solvent						
Analyte Peak Name	Record Modified	Analyte Peak Area	Analyte RRT (Acceptance Range)	Calculated Ion Ratio (Acceptance Range)	Ratio OK	RRT OK
Phenylbutazone 120 (309.100/120.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	N/A	N/A	
Phenylbutazone 188 (309.100/188.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	0.00% (52.43% – 91.14%)		
Phenylbutazone 160 (309.100/160.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	0.00% (49.52% – 86.78%)		
Phenylbutazone 211 (309.100/211.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	0.00% (41.22% – 74.33%)		

Blank						
Analyte Peak Name	Record Modified	Analyte Peak Area	Analyte RRT (Acceptance Range)	Calculated Ion Ratio (Acceptance Range)	Ratio OK	RRT OK
Phenylbutazone 120 (309.100/120.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	N/A	N/A	
Phenylbutazone 188 (309.100/188.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	0.00% (52.43% – 91.14%)		
Phenylbutazone 160 (309.100/160.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	0.00% (49.52% – 86.78%)		
Phenylbutazone 211 (309.100/211.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	0.00% (41.22% – 74.33%)		

Industrial Laboratories
MRM Ion Area Ratios / Retention Time Summary Report

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Negative						
Analyte Peak Name	Record Modified	Analyte Peak Area	Analyte RRT (Acceptance Range)	Calculated Ion Ratio (Acceptance Range)	Ratio OK	RRT OK
Phenylbutazone 120 (309.100/120.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	N/A	N/A	
Phenylbutazone 188 (309.100/188.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	0.00% (52.43% – 91.14%)		
Phenylbutazone 160 (309.100/160.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	0.00% (49.52% – 86.78%)		
Phenylbutazone 211 (309.100/211.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	0.00% (41.22% – 74.33%)		

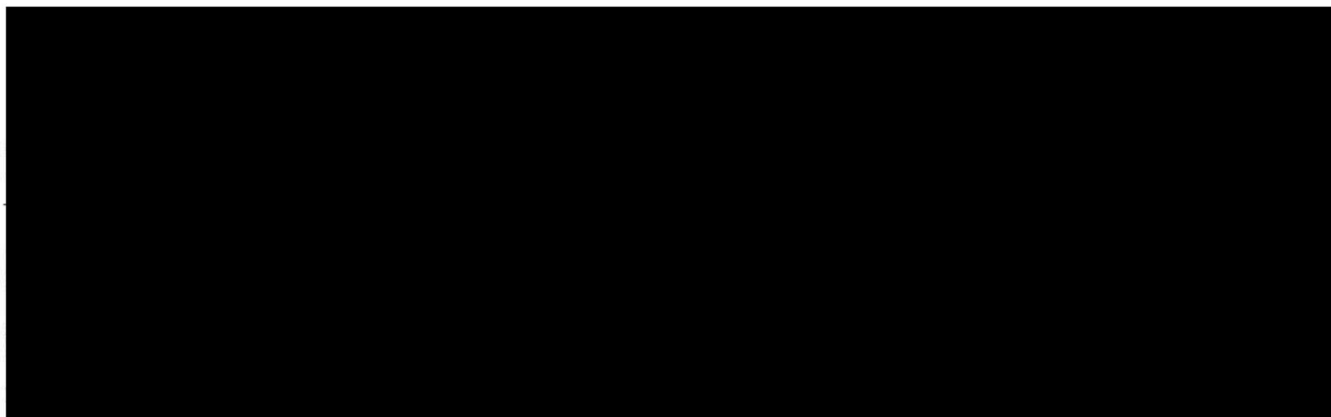
260115013-001-1						
Analyte Peak Name	Record Modified	Analyte Peak Area	Analyte RRT (Acceptance Range)	Calculated Ion Ratio (Acceptance Range)	Ratio OK	RRT OK
Phenylbutazone 120 (309.100/120.100 Da)	No	2.39e+05	1.00 (0.99 – 1.01)	N/A	N/A	✓
Phenylbutazone 188 (309.100/188.100 Da)	No	1.75e+05	1.00 (0.99 – 1.01)	73.22% (52.43% – 91.14%)	✓	✓
Phenylbutazone 160 (309.100/160.100 Da)	No	1.67e+05	1.00 (0.99 – 1.01)	69.87% (49.52% – 86.78%)	✓	✓
Phenylbutazone 211 (309.100/211.100 Da)	No	1.42e+05	1.00 (0.99 – 1.01)	59.41% (41.22% – 74.33%)	✓	✓

260115013-001-2						
Analyte Peak Name	Record Modified	Analyte Peak Area	Analyte RRT (Acceptance Range)	Calculated Ion Ratio (Acceptance Range)	Ratio OK	RRT OK
Phenylbutazone 120 (309.100/120.100 Da)	No	2.35e+05	1.00 (0.99 – 1.01)	N/A	N/A	✓
Phenylbutazone 188 (309.100/188.100 Da)	No	1.68e+05	1.00 (0.99 – 1.01)	71.49% (52.43% – 91.14%)	✓	✓
Phenylbutazone 160 (309.100/160.100 Da)	No	1.61e+05	1.00 (0.99 – 1.01)	68.51% (49.52% – 86.78%)	✓	✓
Phenylbutazone 211 (309.100/211.100 Da)	No	1.40e+05	1.00 (0.99 – 1.01)	59.57% (41.22% – 74.33%)	✓	✓

Wash						
Analyte Peak Name	Record Modified	Analyte Peak Area	Analyte RRT (Acceptance Range)	Calculated Ion Ratio (Acceptance Range)	Ratio OK	RRT OK
Phenylbutazone 120 (309.100/120.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	N/A	N/A	
Phenylbutazone 188 (309.100/188.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	0.00% (52.43% – 91.14%)		
Phenylbutazone 160 (309.100/160.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	0.00% (49.52% – 86.78%)		
Phenylbutazone 211 (309.100/211.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	0.00% (41.22% – 74.33%)		

Industrial Laboratories
MRM Ion Area Ratios / Retention Time Summary Report

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Wash						
Analyte Peak Name	Record Modified	Analyte Peak Area	Analyte RRT (Acceptance Range)	Calculated Ion Ratio (Acceptance Range)	Ratio OK	RRT OK
Phenylbutazone 120 (309.100/120.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	N/A	N/A	
Phenylbutazone 188 (309.100/188.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	0.00% (52.43% – 91.14%)		
Phenylbutazone 160 (309.100/160.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	0.00% (49.52% – 86.78%)		
Phenylbutazone 211 (309.100/211.100 Da)	No	0.00e+00	0.00 (0.99 – 1.01)	0.00% (41.22% – 74.33%)		

P-26-0282-1						
Analyte Peak Name	Record Modified	Analyte Peak Area	Analyte RRT (Acceptance Range)	Calculated Ion Ratio (Acceptance Range)	Ratio OK	RRT OK
Phenylbutazone 120 (309.100/120.100 Da)	No	1.73e+05	1.00 (0.99 – 1.01)	N/A	N/A	✓
Phenylbutazone 188 (309.100/188.100 Da)	No	1.25e+05	1.00 (0.99 – 1.01)	72.25% (52.43% – 91.14%)	✓	✓
Phenylbutazone 160 (309.100/160.100 Da)	No	1.20e+05	1.00 (0.99 – 1.01)	69.36% (49.52% – 86.78%)	✓	✓
Phenylbutazone 211 (309.100/211.100 Da)	No	1.04e+05	1.00 (0.99 – 1.01)	60.12% (41.22% – 74.33%)	✓	✓

Industrial Laboratories
MRM Ion Area Ratios / Retention Time Summary Report

Created with Analyst Reporter
 Printed: 1/29/2026 8:28:47 AM

P-26-0282-2						
Analyte Peak Name	Record Modified	Analyte Peak Area	Analyte RRT (Acceptance Range)	Calculated Ion Ratio (Acceptance Range)	Ratio OK	RRT OK
Phenylbutazone 120 (309.100/120.100 Da)	No	6.17e+05	1.00 (0.99 – 1.01)	N/A	N/A	✓
Phenylbutazone 188 (309.100/188.100 Da)	No	4.40e+05	1.00 (0.99 – 1.01)	71.31% (52.43% – 91.14%)	✓	✓
Phenylbutazone 160 (309.100/160.100 Da)	No	4.13e+05	1.00 (0.99 – 1.01)	66.94% (49.52% – 86.78%)	✓	✓
Phenylbutazone 211 (309.100/211.100 Da)	No	3.42e+05	1.00 (0.99 – 1.01)	55.43% (41.22% – 74.33%)	✓	✓

STD						
Analyte Peak Name	Record Modified	Analyte Peak Area	Analyte RRT (Acceptance Range)	Calculated Ion Ratio (Acceptance Range)	Ratio OK	RRT OK
Phenylbutazone 120 (309.100/120.100 Da)	No	1.73e+05	1.00 (0.99 – 1.01)	N/A	N/A	✓
Phenylbutazone 188 (309.100/188.100 Da)	No	1.21e+05	1.00 (0.99 – 1.01)	69.94% (52.43% – 91.14%)	✓	✓
Phenylbutazone 160 (309.100/160.100 Da)	No	1.21e+05	1.00 (0.99 – 1.01)	69.94% (49.52% – 86.78%)	✓	✓
Phenylbutazone 211 (309.100/211.100 Da)	No	1.05e+05	1.00 (0.99 – 1.01)	60.69% (41.22% – 74.33%)	✓	✓

REPORT(S)



CERTIFICATE OF ANALYSIS

Page of Report: PUBLIC
January 29, 2026

Report # Rpt-260129031

Page 1 of 1

Industrial Laboratories

Horseracing Integrity & Welfare Unit
4801 Main St
Suite 350
Kansas City, MO 64112

FINAL POSITIVE REPORT

I hereby certify that The Industrial Laboratories Company has analyzed the sample identified below :

Sample ID:	200053581	Sample Type:	BLOOD & URINE
Collected At:	Tampa Bay	Test Type:	Post-Race*
Collection Date:	January 14, 2026	Sex/Gender:	GELDING*
		Authorized Medication:	Lasix*

Date Received:	January 15, 2026	Seal Number:	5003376*
Sample Condition:	Acceptable/Secure	Laboratory ID:	260115013-001

The sample was held for further testing based on the results of the screening tests conducted from: January 15, 2026 to January 22, 2026.

Confirmatory testing using Liquid Chromatography - Tandem Mass Spectrometry (LC-MS/MS) gave the following result(s)**:

ADVERSE ANALYTICAL FINDING

Phenylbutazone confirmed in blood.

Comment(s): No Hydrolysis

These testing results only pertain to the sample that was tested and the specified analyte.

I further certify that the confirmatory data supporting this Adverse Analytical Finding was reviewed for accuracy by two separate Certifying Reviewers / Certifying Scientists.

SIGNED:

Timothy R. Krueger

Senior Chemist

Date: 1/29/2026

* This information was provided by the submitting party
 ** Industrial Laboratories does not make any recommendations regarding follow-up actions in response to this result.
 Sample confirmed using Method(s): IL-DTS-S-002, IL-DTS-M-012

TAB 13



NOTICE OF FINAL CIVIL SANCTIONS UNDER THE ADMC PROGRAM

March 4, 2026

SENT EMAIL cjmarch1316@gmail.com

William E. March
6301 Kellogg Rd.
Cincinnati, OH 45230
(727) 365-5222

**Re: ECM2026-41/ECM Charge of Controlled Medication Rule Violation – Rule 3312
Covered Horse: Protest**

This serves as notice to you, William E. March, that the Horseracing Integrity & Welfare Unit (“HIWU”) is imposing the following Consequences against you under the Anti-Doping and Medication Control (“ADMC”) Program pursuant to 15 U.S.C. 3057(d) as set forth in the attached Final Decision:

1. Disqualification of the results of Protest obtained in Race 7 at Tampa Bay Downs in Tampa, Florida on January 14, 2026, 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 USD pursuant to ADMC Program Rule 3323;
3. Assignment of 1.5 Penalty Points pursuant to 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 – Phenylbutazone (Class C). The Controlled Medication Substance was found to be present in a blood Sample collected from Protest after Race 7 at Tampa Bay Downs in Tampa, Florida on January 14, 2026.

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 "M. Pujals", is written over a horizontal line.

Michelle Pujals, HIWU General Counsel

Encls.: Final Decision of HIWU
Payment Instructions for HISA Portal

cc (w/ encls.): Carla March, Owner
Florida Gaming Control Commission
HISA



FINAL DECISION OF HORSERACING INTEGRITY & WELFARE UNIT

ECM2026-41/Controlled Medication Rule Violation/ADMC Program Rules 3312

Covered Person: William E. March

Covered Horse: Protest

On January 14, 2026, Horseracing Integrity & Welfare Unit (“HIWU”) Sample Collection Personnel collected a blood Sample, designated as # B200053581, from Protest after Race 7 at Tampa Bay Downs in Tampa, Florida under the Anti-Doping and Medication Control (“ADMC”) Program. Protest’s A Sample was submitted to Industrial Laboratories in Denver, Colorado (“Industrial”). Industrial analyzed the A Sample in accordance with the Equine Standards for Laboratories and Accreditation and reported an Adverse Analytical Finding because it detected Phenylbutazone in the Sample. Phenylbutazone is a category S7, Class C Controlled Medication Substance on the Prohibited List and Technical Document-Prohibited Substances.

I. ECM Notice

On February 4, 2026, Mr. March was served an ECM Notice pursuant to ADMC Program Rule 3345 of the ADMC Program in which he was advised of: (a) the resulting potential violation of ADMC Program Rule 3312 for the Presence of a Controlled Medication Substance and/or its Metabolites or Markers in a Post-Race Sample; (b) the required Consequences for this potential violation of ADMC Program Rule 3312; (c) that he had until February 9, 2026 to request B Sample analysis; and (d) that he had until February 11, 2026 to provide HIWU with an explanation for the potential violation of ADMC Program Rule 3312.

He received the ECM Notice by email, sent to the email address provided by Mr. March in the HISA Portal. Notice by email is permitted under ADMC Program Rule 3350. Mr. March did not request B Sample analysis by February 9, 2026, and therefore waived his right for B Sample analysis pursuant to ADMC Program 3345(a)(4)(ii). On that date, Mr. March replied to the ECM Notice requesting a stay and claiming that there were errors in the Sample Collection Documentation. However, his challenge to the signatures on the Sample Collection Documentation did not have a reasonable basis. Mr. March also sent a document request to Industrial, which was outside the scope of the ADMC Program Rules. On February 12, 2026, HIWU responded that the A Sample Laboratory Documentation Package had been requested from Industrial and that no other documentation would be provided in response to Mr. March’s document request.

II. ECM Charge

On February 13, 2026, Mr. March was served an ECM Charge from HIWU, pursuant to ADMC Program Rule 3348. In that ECM Charge, he was given, under ADMC Program Rule 3348(d), until February 20, 2026 to: (a) accept the Consequences proposed by HIWU, in which case HIWU would issue a decision under ADMC Program Rule 3349; (b) seek to agree to mitigated Consequences with HIWU pursuant to ADMC Program Rule 3349, failing which the Consequences could still be disputed at a hearing; or (c) dispute or seek to mitigate the proposed



Consequences at a hearing in accordance with ADMC Program Rule 3361 and the Arbitration Procedures. Mr. March was also given the option to deny the Controlled Medication Rule Violation charged and dispute the proposed Consequences at a hearing in accordance with ADMC Program Rule 3361 and the Arbitration Procedures.

The Consequences proposed by HIWU were:

1. Disqualification of the results of Protest obtained in Race 7 at Tampa Bay Downs in Tampa, Florida on January 14, 2026, 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 USD pursuant to ADMC Program Rule 3323;
3. Assignment of 1.5 Penalty Points pursuant to ADMC Program Rule 3328; and
4. Public Disclosure in accordance with ADMC Program Rules 3620 and 3331.

On February 19, 2026, HIWU contacted Mr. March, advising him that there is no right to discovery or wide-ranging document production under the ADMC Program. He was also advised that he was required to elect whether we would sign an Admission of Equine Controlled Medication Rule Violation and Acceptance of Consequences or request a hearing before the Internal Adjudication Panel ("IAP"). As it had no basis to do so under the ADMC Program Rules, HIWU declined his request to dismiss or stay the matter.

On February 24, 2026, HIWU provided the A Laboratory Documentation Package to Mr. March and once again advised him that he was required to sign an Admission of Equine Controlled Medication Rule Violation and Acceptance of Consequences or request a hearing before the IAP. As of March 3, 2026, Mr. March has not notified HIWU of his election.

III. Imposition of Consequences

Given Mr. March's waiver of his right to a hearing, he is deemed to have admitted the charged ADMC Program Rule Violation and accepted the Consequences proposed by HIWU. Consequently, HIWU imposes the following Consequences against him under the ADMC Program, pursuant to 15 U.S.C. 3057(d):

- A. Disqualification of the results of Protest obtained in Race 7 at Tampa Bay Downs in Tampa, Florida on January 14, 2026, 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;
- B. A fine of \$500 USD pursuant to ADMC Program Rule 3323;
- C. Assignment of 1.5 Penalty Points pursuant to ADMC Program Rule 3328; and



D. Public Disclosure in accordance with ADMC Program Rules 3620 and 3331.

THE HORSERACING INTEGRITY & WELFARE UNIT
DATED: MARCH 4, 2026



Fine Payment Instructions

Pay Online on HISA (portal.hisapps.org) OR

- Covered Person logs into the HISA portal at portal.hisapps.org using their username and password
- Select “My Information” and scroll down to Rulings section for outstanding fines owing
- Ensure the email address is completed and saved
- Click on “Pay Fines” to begin payment
- Credit Card, ACH Bank Debit, Google Pay, Apple Pay accepted
- No fees to make a payment

Pay by Check:

SEND CHECK PAYMENTS AT LEAST 15 DAYS BEFORE THE DUE DATE TO ALLOW TIME FOR MAIL DELIVERY AND MANUAL PAYMENT PROCESSING. INCOMPLETE INFORMATION WILL INCREASE PROCESSING TIMES.

A Covered Person must include the following 2 items in the envelope sent to HISA:

- A check covering the full amount payable to HISA.
- A copy of the Ruling Form that includes HISA#xxx-xxx-xxx - either the Stewards Ruling Form, or a ruling that has been provided by the Racing Safety Committee, HISA board, National Stewards panel, or other Arbitral body assigned by HISA.

HISA mailing Address:	Horseracing Integrity and Safety Authority 201 East Main St., Suite 340 Lexington, Kentucky 40507
-----------------------	--

PLEASE NOTE: ALL PAYMENTS ARE DUE WITHIN THE SPECIFIED DAYS OF THE RULING (default is 30 days unless noted otherwise). FAILURE TO PAY BY THE DUE DATE MAY RESULT IN SUSPENSION. YOU ARE ADVISED TO PAY ONLINE OR SEND CHECKS AT LEAST 15 DAYS BEFORE THE DUE DATE TO ALLOW TIME FOR MAIL DELIVERY AND MANUAL PAYMENT PROCESSING. INCOMPLETE INFORMATION WILL INCREASE PROCESSING TIMES.

TAB 14

Monica Pilarski

From: Monica Pilarski
Sent: Wednesday, March 4, 2026 2:33 PM
To: 'cjmarch1316@gmail.com'
Cc: Geneva Gnam; Michelle Pujals
Subject: HIWU: Notice of Sanctions and Final Decision - Controlled Medication Rule Violation(s) - March, William/Protest
Attachments: 2026-03-04 Notice of Sanctions and Final Decision Letter to March, William re Protest (w encls.).pdf

Tracking:	Recipient	Read
	'cjmarch1316@gmail.com'	
	Geneva Gnam	
	Michelle Pujals	
	Kathryn Crouse	
	Kyle Kremers	Read: 3/4/2026 2:34 PM
	Patricia A. Marquis	

Dear Mr. March,

Please see the attached Notice of Sanctions and Final Decision letter regarding Controlled Medication Rule Violation(s). Please note the attached has instructions on how to pay your fine through the HISA Portal.

If you have any questions, please contact the attorney who handled your matter, Geneva Gnam, at ggnam@hiwu.org or (816) 601-6897.

Thank you,



Monica Pilarski | HIWU Legal Specialist
Horseracing Integrity & Welfare Unit
Drug Free Sport International
mpilarski@hiwu.org
 Cell: (816) 601-5832
 4801 Main Street, Suite 350
 Kansas City, MO 64112
hiwu.org
drugfreesport.com

TAB 15

Monica Pilarski

From: Monica Pilarski
Sent: Wednesday, March 4, 2026 2:34 PM
To: cjmarch1316@gmail.com
Cc: Geneva Gnam; Michelle Pujals
Subject: HIWU: Notice of Sanctions and Final Decision - Controlled Medication Rule Violation(s) - March, William/Protest
Attachments: 2026-03-04 Notice of Sanctions and Final Decision Letter to March, William re Protest (w encls.).pdf

Dear Ms. March,

Please see the attached Notice of Sanctions and Final Decision letter to William March regarding Controlled Medication Rule Violation(s).

If you have any questions, please contact the attorney who handled this matter, Geneva Gnam, at ggnam@hiwu.org or (816) 601-6897.

Thank you,



Drug Free Sport
INTERNATIONAL™

Monica Pilarski | HIWU Legal Specialist

Horseracing Integrity & Welfare Unit

Drug Free Sport International

mpilarski@hiwu.org

Cell: (816) 601-5832

4801 Main Street, Suite 350

Kansas City, MO 64112

hiwu.org

drugfreesport.com



TAB 16

Monica Pilarski

From: Geneva Gnam
Sent: Friday, March 6, 2026 8:11 AM
To: Monica Pilarski; billmarchtrainer@gmail.com; Carla March
Subject: Re: Scan from Staples

Mr. March:

Please find the link for appeal procedures for review of final civil sanctions imposed. The appeal procedures are located in 16 Code of Federal Regulations Part I, Subpart T and can be found on the FTC website, available at this link: <https://www.ftc.gov/about-ftc/bureaus-offices/office-secretary/file-documents-adjudicative-proceedings>.

Geneva

Geneva N. Gnam, Esquire | Litigation Counsel
Horseracing Integrity & Welfare Unit
Drug Free Sport International
C: (816) 601-6897
E: ggnam@hiwu.org

From: Staples Print & Marketing Services <Ccreg14@staplesbusinesscenter.com>
Sent: Thursday, March 5, 2026 4:37 PM
To: Geneva Gnam <ggnam@hiwu.org>; Monica Pilarski <mpilarski@hiwu.org>; tkrueger@industriallaboratories.net <tkrueger@industriallaboratories.net>; desantis.opengov@eg.myflorida.com <desantis.opengov@eg.myflorida.com>; billmarchtrainer@gmail.com <billmarchtrainer@gmail.com>
Subject: Scan from Staples

Please find the scanned documents from Staples attached to this email. -Staples Print and Marketing Services

Saturday, February 14, 2026 thru Wednesday , March 4, 2026(some additions added after receiving March 4, 2026 NOTICE Of FINAL SANCTIONS UNDER THE ADMC PROGRAM)

Geneva N. Gnam, Esquire
Litigation Counsel
Horseracing Integrity & Welfare Unit
4801 Main Street
Suite 350
Kansas City, MO 64112-2740
e-mail; ggnam@hiwu.org and
ggnam@hiwu.com

and

Monica Pilarski
Legal Assitant
Horseracing and Integrity Unit
4801 Main Street
Suite 350
Kansas City, MO 64112-2740
e-mail; mpilarski@hiwu.com

and

Timothy Kruegar
Industrial Laboratories
Horseracing Integrity & Welfare Unit
4801 Main Street
Suite 350
Kansas City, MO 64112twww.industriallabs.net/terms and
www.industriallabs.net

RESPONSE TO; FEBRUARY 13, 2026;
ECM Charge of Controlled Medication Rule Violation,
Covered Horse: Protest; Sample #B200053581

I. NOTICE

NOTICE OF INTENT TO FILE SUIT AGAINST THE PERSONS INVOLVED WITH ORGANIZING, VOTING FOR, INVESTING IN, DRAWING SALARIES FROM, PUBLISHING RULES AND EMPLOYEE RESPONSIBILITIES, ISSUING CHARGES AGAINST CITIZENS OF THESE UNITED STATES AND THE STATE OF FLORIDA AND OTHER STATE CITIZENS AFFECTED BY THESE PRIVATE LAWS. ANY FUTURE SUIT WILL INCLUDE THE RIGHTS TO MONEY LOST, REPUTATION AFFECTED AND PENALTIES FOR OPERATING OUTSIDE THE LAW AND CONSTITUTION OF THE UNITED STATES AND THE STATE OF FLORIDA

This includes, HISA and HIWU, and their private employees and each Federal Senator and Congressman and woman who voted for and were involved in the creating, writing, passing and enforcing of these laws, which established an unconstitutionally formed group of private regulators. The same will apply to state employees and non-government people assisting these government entities in violating Florida State Law and United States Federal Law.

A. HIWU's informing letter of February 4, 2026 titled; ECM Notice of Alleged Controlled Medication Rule Violation, Covered Horse; Protest, Sample #B200053581 and Gmail from Monica Pilarski reference the Notice , dated Wed. February 4 at 11:24 AM.

Questions

1. According to the HIWU, Horseracing Integrity & Welfare Unit, CONFIDENTIAL letter of February 4, 2026 notice;

Rule 3040. Core Responsibilities of Covered Persons

(a) Responsibilities of all covered persons:

It is the personal responsibility of each Covered Person:

(1)...

(2) to cooperate promptly and completely with the Authority and the Agency in the exercise of their respective powers under the Act and the Protocol and related rules, including:

(i)...

(ii)...

(iii)...

(A)...

(B) submitting to under-oath transcribed interviews about his or her dealings with or in relation to Covered Horses;

(C) ...

(D) ...Failure to cooperate promptly and completely with Agency may constitute a violation pursuant to Rule 3510(b); and...

(3) (...or recording any Sample Collection Session contrary to Rule 5410) Failure to comply may constitute a violation pursuant to Rule 3510(a) engages in disruptive or offensive conduct towards a Doping Control official or other Person involved in Doping Control that does not rise to the level of Tampering.

Certainly, these rules apply to HISA /HIWU and track employees when in contact with licensees. Including spit barn and laboratory employees, “...cooperate promptly and completely...” The track spit barn employees have responsibilities to the licensees such as signing and documenting properly ALL specimens of blood and urine taken from the winner and forwarding it to the testing laboratory correctly. This was not done in this case. See the Sample Collection form of

01/14/2026 and the Certificate of Analysis form of January 29, 2026.

*****Florida and Federal Law allows the taping of conversations when all persons are advised it is taking place*****

See the HIWU-Acceptance of A Sample Analytical Results and B Sample Analysis Waiver Form attached in blank to HIWU February 4, 2026 correspondence letter. This is a communistic approach at enforcement;

Definition of Communism Webster's New College Dictionary(1977);

1 a : a theory advocating elimination of private property b; a system in which goods are owned in common and are available to all as needed. 2...a doctrine based on revolutionary Marxian socialism and Marxism-Leninism that is the official ideology of the U.S.S.R. b.: a totalitarian system of government in which a single authoritarian party controls state owned means of production with the professed aim of establishing a stateless society... HIWU wishes to eliminate Florida State and Federal law.

HIWU states further; EITHER LET HISA TEST THE A SAMPLE AND B SAMPLE , PLEAD GUILTY, AND WAIT THE DECISION...WHAT ABOUT THE A SAMPLE TESTS AND RESULTS WHICH ARE KEPT SECRET UNTIL PUNISHMENT AND DECISION IS ISSUED BY HISA/HIWU.? You must send the B Sample to the same laboratory that HISA/HIWU uses. No laboratory can attest to the correctness of their own work/results! Especially, when HISA/HIWU demands requesting results go thru their organization. I FORWARDED A REQUEST FOR PRODUCTION WEDNESDAY, FEBRUARY 11, 2025(6)(TYPO). *HIWU stated they would not respond*****

Sunday, February 7, 2026: Response To ECM Notice of Alleged Controlled Medication Rule Violation of February 4, 2026 to Geneva N. Gnam, Esq., **“...move for an immediate stay, followed by dismissal of any disciplinary action from the alleged findings ,HIWU’s Rpt-260129031...”**

2. Who is the **authorized delegate** mentioned in the first paragraph of the **ECM Notice** above and what are his/her qualifications, training, and work history. There are no complete and readable signatures on the **Sample Collection Form** of; 01/14/2026. Please answer **My Request For Production** dated Wednesday, February 11, 2025(6)(Typo).

3. What are the names and identifying employee I.D. numbers of the two employees who reviewed for **accuracy** the **Adverse Analytical Findings**? What are their positions and training that qualifies them to confirm the correctness of Timothy R. Krueger’s **work and results**. Why weren’t these chemists named before any charges were made and before my wife was noticed? You should have sent two copies, one for her and one for me! Please NOTICE Me and My Wife Carla in the future; **billmarchtrainer@gmail.Com**.

4. Please mail certified copies of the three laboratory employee’s personnel files. The three laboratory chemists referred to in the Certificate of Analysis dated January 29, 2026. They should include training, education, discipline, work assignments and responsibilities including the names of their immediate supervisors.

Please supply a copy of the Industrial Laboratories physical address, licensing numbers, and state and federal laws which govern and regulate their practice and existence.

5. What is the training, work history, discipline and education of Timothy R. Krueger/ I have previously **requested his resume or vitae**. As of the date of this report **the records have not been furnished to me** by HISA/HIWU or Timothy R. Krueger of the Industrial Laboratories in Denver Colorado. Employee ID numbers are not known. See the Certificate of Analysis dated January 29, 2026 **which is lacking the names of the two separate Certifying Reviewers** and the information mentioned above. Have any of these three laboratory employees qualified as an expert witness before a presiding judge?

II. **CHRONOLOGY OF PAPERS SENT AND RECEIVED FROM HISA/HIWU, Including Emails And Faxes**

1. **Wednesday, February 4, 2026** at 11:24 AM; **GMAIL from Monica Pilarski, HIWU Legal Assitant; HIWU: ECM Notice-Potential Controlled Medication Rule Violation Covered Horse: Protest Sample #B200053581**. SENT VIA EMAIL TO; WILLIAM E. MARCH @cjmarsh1316@gmail.com., and one pager dated Wednesday, February 4, at 11:24 AM from pilarsk... **noticing of a potential violation...**
2. **Sunday, February 7, 2026**, **Response To ECM Notice of Alleged Controlled Medication Rule Violation** of February 4, 2026. "I move for an immediate stay, followed by dismissal..." Any charges from HISA are not legal or valid by law.
3. **Monday, February 9, 2026****E-mail's to; Monica Pilarske @mpilarski@hiwu.org** and Geneva N. Gnam, Esq. @ggnam@hiwu.org. from m **cjmarsh1316@gmail.com** and rersponse from Geneva Gnam **ggnam@hiwu.org**. **"I do not have a fax number. You may send any documents you wish to my email."** Pilarski's Phone Number (816)601-5832; Fax: Number(816)285-1433.

4. **Wednesday, February 11, 2025(6); Request For Production to Timothy R. Kruegar, Industrial Laboratories.** Mr. Kruegar has not responded as of the date of this filing. However, about one hour ago my wife received an email from HIWU containing 35 pages, some of which were partially blacked out. I herein request that HIWU send me the following pages without the blackout covering parts of the documents; pages 7, 8, 14, 15, 16, 20, 22, 23, 24,25, 26, 27,28, 29 and 32.

Many of the signatures on these records are none verifiable. You can see for yourself. This laboratory record is not reliable.

5. Thursday, February 12, 2026, Email from Geneva Gnam ggnam@hiwu.org , To: Monica Pilarski mpilarski@hiwu.org and billmarchtrainer@gmail.com and Carla March at cjmarch1316@gmail.com. Subject: March/Protest-Document Requests.

Mr. March:

Any requests for information need to. Be addressed to HIWU. As such, Industrial Laboratories will not be responding to your inquiries from today. ***There is no right to discovery or wide-ranging document production under the ADMC Program***

- 1) HIWU has requested a copy of the A Sample Laboratory Documentation Package and will provide it to you upon receipt in accordance with ADMC Program Rule 3345(a)(3).

*****HISA CONTROL;** See II, #4 above which lists the pages that blackout information took place. Was that done by Industrial Laboratories employees, Timothy R. Krueger, or HISA or HIWU employees or administrators? Please explain in writing***

Email of Thursday, February 12, at 5:10PM from. GNAM to PILARSKI and CARLA MARCH. A copy was not received

@billmarchtrainer@gmail.com. If I discover I'm incorrect I will advise Monica Pilarski.

- 2) As indicated in Section IV of the February. 4, 2026 **Notice Letter**, the deadline to request analysis of Protest's B Sample was Monday February 9, 2026 at. 5pm CST. No such request was made, and accordingly, the B Sample analysis is deemed waived pursuant to ADMC Program Rule 3345(a)(4)(ii).

HISA never replied to William March's **REQUEST FOR PRODUCTION** dated WENESDAY, FEBRUARY 11, 2026 and ignored the Sunday, February 7, 2026, "**I move for an immediate stay**, followed by dismissal of any recommended disciplinary action from the alleged findings of HIWU's Rpt-260129031. See my report of Sunday, February 7, 2026.

Apart from the above, **HIWU will not be providing any of the documentation requested as the requests are outside the scope of ADMC Program Rules.** A Charge Letter will be issued tomorrow, which will detail your options moving forward.

Geneva

Geneva N. Gnam, Esquire/ Litigation Counsel.

***HIWU employees need to follow Florida State Law and United States Federal Law and not have convenient illegal laws provided by such Congressmen as **the ill Mitch McConnell**. How can any law backed by Mitch McConnell be valid? He is and was in a leadership position in the United States Senate. His mental abilities were affected by his medical condition. Why was President Joseph R. Biden allowed to finish his term in office? His mental condition was obviously in a deteriorated condition. He was not often seen in public.

6. Friday, February 13, 2026; **HIWU Letter reference ECM Charge of Controlled Medication Rule Violation, Covered Horse: Protest, Sample**

#B200053581.

Your options, as outlined in the February 13, 2026 **Charge Letter**;

“...On February 9, 2026, the B Sample was not analyzed and your opportunity to **request the analysis of the B Sample has been waived.**”

(2) “...deny the Violation and request a hearing. The deadline to either admit the violation or **to request a hearing is tomorrow.**, February 20, 2026 at 5pm CST. **HIWU is not staying** or dismissing this matter.”

“Because you did not request the analysis of Protest’s B Sample by the deadline of 5pm CST... However, **there is no right to discovery or wide-ranging document production under the ADMC Program.** Accordingly, apart from the A Sample Laboratory Documentation Package, **HIWU will not be providing any of the requested outside the scope of ADMC Program Rules.**” The Program Rules are outside Florida and United States Laws and Constitutions.

7. On February 17, 2026; **REQUEST FOR DISMISSAL OF CHARGES**,
Re: Answer To: HIWU Letter of February 13, 2026. “pg 4 of 5, Please inform HIWU, in writing...reference, “...They established a non-government organization to control horse racing in the United States of American.”

This organization was developed by a small but powerful group of wealthy horsemen supported by animal cruelty organizations and politicians who prospered. Please read the entire REQUEST.

8. **On February 19, 2026, 10:30 A.M. I received an E-Mail via my wife’s E-Mail;**

Email from Geneva Gnam 11:15 AM ;

Mr. March:

“As HIWU indicated in the attached email on February 12, 2026, Industrial Laboratories will not separately respond to your inquires. Any requests for documentation must come through HIWU.*In case changes need to be made or discarded***”**

HIWU has requested and will provide a copy of the A Sample Laboratory Documentation Package upon receipt. **However, there is “no right to under the ADMC Program.”** Accordingly, apart from the **A Sample Laboratory Documentation Package, HIWU will not be providing any of the documentation requested as the requests are outside the scope of ADMC Program Rules (the non-government group has spoken. You vill obey)!!!** The HIWU and HISA organizations are outside the Laws of Florida and the United States of America!!! See II.4. on page #6 of this document.

Your options, as outlined in the February 13, 2026 Charge Letter are: **“1) admit the violation and accept the Consequences; or 2) deny the Violation and request a hearing. The deadline to either admit the violation or to request a hearing is tomorrow, February 20, 2026 at 5 pm CST. HIWU is not staying or dismissing this matter.”** Of course not, the organizations were established illegally and do not follow rules and laws.

HISA and their employees can retract their Charging Documents and avoid or lesson their consequences of violating State and Federal Laws. **As I worked on this document my wife advised me there was a notice from HIWU on her email; dated March 4, 2026 @ 2:33 PM. She printed it out and handed me a copy which I attached to this correspondence as T-1.**

Note: I continued on this correspondence.

These rules and laws are so illegal they remind me of a situation I experience in junior high school during the 60’s. At West Miami Junior High School I was in the 7th grade waiting in line for a drink of water. Two girls were in front of me. A big (obviously behind a number of grades) recently arrived boy from Cuba, walked up and stood to the right of the girls

watching them take a drink. I'll never forget his words in broken English as he stepped in front of me in line, "my name is Montana, I don't wait," He stepped in front of me in line at the water fountain and started to drink. I stepped to the right to even with him, put my books down and nailed him with my fist in the right jaw. He went up against the wall next to the water fountain and slid down to a sitting position on the floor. He was big and muscular. He got up and without saying or doing anything he left. The algebra teacher was outside his room watching the classes change. He quietly clapped so I could see it. Welcome to America! Being fair and right is important! **Bullying is not American** especially after a non-government entity, HISA, manipulates to become government and then demands payment be made by Churchill Downs for their expenses and pay.

What I do believe in is the Florida Division of Pari-Mutuel Wagering should have handled this matter under the Florida Administrative Procedures Act. The Federal Government is too far removed to fairly enforce their private laws. How many "racing" states are in litigation over this issue? How many won't let HISA in their states to manipulate racing. Many of the YES VOTERS who established these HISA laws and rules are extremely out of touch, corrupt and greedy. These laws were for their use and benefit and not fair regulatory state laws. I'm in Florida. My wife's horse Protest raced in Tampa Florida. The Florida Division of Pari-mutuel Wagering is in Tallahassee, Florida. The state courts are in Florida. Florida has a Republican Governor. What is the Government of Colorado like? What is the government in Missouri like? Why did HISA land in these states? The Industrial Laboratories are in Kansas City, Missouri.

HIWU demands the states and licensees pay their salaries and expenses. Email and Fax is HIWU's preferred mode of communication. U.S. Post Office, Certified Mail, Return Receipt Requested is a by gone.

HIWU mailed my notice to William E. March, 6301 Kellogg Rd., Cincinnati, OH 45230. I never received Proper/legal Notice. For future correspondence my e-mail address is billmarchtrainer@gmail.com, wife Carla , cjmarsh1316@gmail.com. My mailing address is; 2960 Sutherland Ct., Palm Harbor, Florida 34684.

IV.

CLOSING

HISA/HIWU has no constitutional or legal right to enforce Florida Horse Racing. Do not mistake power for legal right. **The Florida Department of Pari-Mutuel Wagering is the Florida state organization that was recently bullied by misguided Federal Legislatures out of their state responsibilities.**

WHO BENEFIT'S?

1. CERTAIN INVOLVED FEDERAL LEGISLATIVE BACKERS
2. FEDERAL LOBBYISTS
3. HISA/HIWU AND EMPLOYEES
4. READ ABOUT CHURCHILL DOWNS MONEY ISSUE WITH HISA

WHO PAYS THEIR NEW BENEFITS AND SALARIES?

1. HORSE OWNERS
2. HORSE TRAINERS
3. RACETRACK OWNERS AND EMPLOYEES
4. STATE PARI-MUTUEL EMPLOYEES, RACE TRACK OWNERS AND HORSE OWNERS< TRAINERS AND EMPLOYEES

This is an old game and career. The same type of government manipulation is being used to change the control of the horse race industry as was used letting illegal immigrants into the United States. Ignore the law!

Note: Six (6) pages received from HIWU as I was finishing this letter are attached.

Florida Licensed Trainer,



WILLIAM E. MARCH

Thoroughbred Horse Trainer

2960 Sutherland Court

Palm Harbor, Florida 34684

(727)365-5222

2025-2026 Florida Trainers License #302380; 06/30/2028;

Prior Licenses(some current); Ohio, Kentucky, Illinois, West

Virginia

billmarchtrainer@gmail. Com

Cc;

Carla March

Thoroughbred Horse Owner

2025-2026 Florida

Also licensed previously in other states

Cjmarch1316@gmail.com

Monica Pilarski

HIWU Legal Assistant

mpilarski@hiwu.org

Geneva Gnam
Litigation Counsel
Horseracing Integrity & Welfare Unit
ggnam@hiwu.org

Timothy Krueger
Industrial Laboratories
(303)287-9691
tkrueger@industriallaboratories.net

Office of Florida Governor
Ron DeSantis
The Capitol
400 S. Monroe Street
Tallahassee, Florida 32399
And
Desantis.opengov@eg.myflorida.com

Other distribution will follow.

Attached is a copy of HIWU's March 4, 2026 letter from Michelle Pujals, HIWU General Counsel, which my wife Carla March received by email.

2:00 on case 011111

124
PUBLIC

NOTICE OF FINAL CIVIL SANCTIONS UNDER THE ADMC PROGRAM

March 4, 2026

SENT EMAIL cjmarch1316@gmail.com

William E. March
6301 Kellogg Rd.
Cincinnati, OH 45230
(727) 365-5222

**Re: *ECM2026-41/ECM Charge of Controlled Medication Rule Violation – Rule 3312
Covered Horse: Protest***

This serves as notice to you, William E. March, that the Horseracing Integrity & Welfare Unit (“HIWU”) is imposing the following Consequences against you under the Anti-Doping and Medication Control (“ADMC”) Program pursuant to 15 U.S.C. 3057(d) as set forth in the attached Final Decision:

1. Disqualification of the results of Protest obtained in Race 7 at Tampa Bay Downs in Tampa, Florida on January 14, 2026, 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 USD pursuant to ADMC Program Rule 3323;
3. Assignment of 1.5 Penalty Points pursuant to 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 – Phenylbutazone (Class C). The Controlled Medication Substance was found to be present in a blood Sample collected from Protest after Race 7 at Tampa Bay Downs in Tampa, Florida on January 14, 2026.

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". The signature is written in a cursive, flowing style.

Michelle Pujals, HIWU General Counsel

Encls.: Final Decision of HIWU
Payment Instructions for HISA Portal

cc (w/ encls.): Carla March, Owner
Florida Gaming Control Commission
HISA



FINAL DECISION OF HORSERACING INTEGRITY & WELFARE UNIT

ECM2026-41/Controlled Medication Rule Violation/ADMC Program Rules 3312

Covered Person: William E. March

Covered Horse: Protest

On January 14, 2026, Horseracing Integrity & Welfare Unit ("HIWU") Sample Collection Personnel collected a blood Sample, designated as # B200053581, from Protest after Race 7 at Tampa Bay Downs in Tampa, Florida under the Anti-Doping and Medication Control ("ADMC") Program. Protest's A Sample was submitted to Industrial Laboratories in Denver, Colorado ("Industrial"). Industrial analyzed the A Sample in accordance with the Equine Standards for Laboratories and Accreditation and reported an Adverse Analytical Finding because it detected Phenylbutazone in the Sample. Phenylbutazone is a category S7, Class C Controlled Medication Substance on the Prohibited List and Technical Document-Prohibited Substances.

I. ECM Notice

On February 4, 2026, Mr. March was served an ECM Notice pursuant to ADMC Program Rule 3345 of the ADMC Program in which he was advised of: (a) the resulting potential violation of ADMC Program Rule 3312 for the Presence of a Controlled Medication Substance and/or its Metabolites or Markers in a Post-Race Sample; (b) the required Consequences for this potential violation of ADMC Program Rule 3312; (c) that he had until February 9, 2026 to request B Sample analysis; and (d) that he had until February 11, 2026 to provide HIWU with an explanation for the potential violation of ADMC Program Rule 3312.

He received the ECM Notice by email, sent to the email address provided by Mr. March in the HISA Portal. Notice by email is permitted under ADMC Program Rule 3350. Mr. March did not request B Sample analysis by February 9, 2026, and therefore waived his right for B Sample analysis pursuant to ADMC Program 3345(a)(4)(ii). On that date, Mr. March replied to the ECM Notice requesting a stay and claiming that there were errors in the Sample Collection Documentation. However, his challenge to the signatures on the Sample Collection Documentation did not have a reasonable basis. Mr. March also sent a document request to Industrial, which was outside the scope of the ADMC Program Rules. On February 12, 2026, HIWU responded that the A Sample Laboratory Documentation Package had been requested from Industrial and that no other documentation would be provided in response to Mr. March's document request.

II. ECM Charge

On February 13, 2026, Mr. March was served an ECM Charge from HIWU, pursuant to ADMC Program Rule 3348. In that ECM Charge, he was given, under ADMC Program Rule 3348(d), until February 20, 2026 to: (a) accept the Consequences proposed by HIWU, in which case HIWU would issue a decision under ADMC Program Rule 3349; (b) seek to agree to mitigated Consequences with HIWU pursuant to ADMC Program Rule 3349, failing which the Consequences could still be disputed at a hearing; or (c) dispute or seek to mitigate the proposed



Consequences at a hearing in accordance with ADMC Program Rule 3361 and the Arbitration Procedures. Mr. March was also given the option to deny the Controlled Medication Rule Violation charged and dispute the proposed Consequences at a hearing in accordance with ADMC Program Rule 3361 and the Arbitration Procedures.

The Consequences proposed by HIWU were:

1. Disqualification of the results of Protest obtained in Race 7 at Tampa Bay Downs in Tampa, Florida on January 14, 2026, 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 USD pursuant to ADMC Program Rule 3323;
3. Assignment of 1.5 Penalty Points pursuant to ADMC Program Rule 3328; and
4. Public Disclosure in accordance with ADMC Program Rules 3620 and 3331.

On February 19, 2026, HIWU contacted Mr. March, advising him that there is no right to discovery or wide-ranging document production under the ADMC Program. He was also advised that he was required to elect whether we would sign an Admission of Equine Controlled Medication Rule Violation and Acceptance of Consequences or request a hearing before the Internal Adjudication Panel ("IAP"). As it had no basis to do so under the ADMC Program Rules, HIWU declined his request to dismiss or stay the matter.

On February 24, 2026, HIWU provided the A Laboratory Documentation Package to Mr. March and once again advised him that he was required to sign an Admission of Equine Controlled Medication Rule Violation and Acceptance of Consequences or request a hearing before the IAP. As of March 3, 2026, Mr. March has not notified HIWU of his election.

III. Imposition of Consequences

Given Mr. March's waiver of his right to a hearing, he is deemed to have admitted the charged ADMC Program Rule Violation and accepted the Consequences proposed by HIWU. Consequently, HIWU imposes the following Consequences against him under the ADMC Program, pursuant to 15 U.S.C. 3057(d):

- A. Disqualification of the results of Protest obtained in Race 7 at Tampa Bay Downs in Tampa, Florida on January 14, 2026, 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;
- B. A fine of \$500 USD pursuant to ADMC Program Rule 3323;
- C. Assignment of 1.5 Penalty Points pursuant to ADMC Program Rule 3328; and



D. Public Disclosure in accordance with ADMC Program Rules 3620 and 3331.

THE HORSERACING INTEGRITY & WELFARE UNIT
DATED: MARCH 4, 2026



HORSERACING INTEGRITY AND SAFETY AUTHORITY

Fine Payment Instructions

Pay Online on HISA (portal.hisausapps.org) OR

- Covered Person logs into the HISA portal at portal.hisausapps.org using their username and password
- Select “My Information” and scroll down to Rulings section for outstanding fines owing
- Ensure the email address is completed and saved
- Click on “Pay Fines” to begin payment
- Credit Card, ACH Bank Debit, Google Pay, Apple Pay accepted
- No fees to make a payment

Pay by Check:

SEND CHECK PAYMENTS AT LEAST 15 DAYS BEFORE THE DUE DATE TO ALLOW TIME FOR MAIL DELIVERY AND MANUAL PAYMENT PROCESSING. INCOMPLETE INFORMATION WILL INCREASE PROCESSING TIMES.

A Covered Person must include the following 2 items in the envelope sent to HISA:

- A check covering the full amount payable to HISA.
- A copy of the Ruling Form that includes HISA#xxx-xxx-xxx - either the Stewards Ruling Form, or a ruling that has been provided by the Racing Safety Committee, HISA board, National Stewards panel, or other Arbitral body assigned by HISA.

HISA mailing Address: Horseracing Integrity and Safety Authority
201 East Main St., Suite 340
Lexington, Kentucky
40507

PLEASE NOTE: ALL PAYMENTS ARE DUE WITHIN THE SPECIFIED DAYS OF THE RULING (default is 30 days unless noted otherwise). FAILURE TO PAY BY THE DUE DATE MAY RESULT IN SUSPENSION. YOU ARE ADVISED TO PAY ONLINE OR SEND CHECKS AT LEAST 15 DAYS BEFORE THE DUE DATE TO ALLOW TIME FOR MAIL DELIVERY AND MANUAL PAYMENT PROCESSING. INCOMPLETE INFORMATION WILL INCREASE PROCESSING TIMES.

TAB 17



AMENDED NOTICE OF FINAL CIVIL SANCTIONS UNDER THE ADMC PROGRAM

March 9, 2026

SENT EMAIL cjmarch1316@gmail.com

William E. March
6301 Kellogg Rd.
Cincinnati, OH 45230
(727) 365-5222

**Re: ECM2026-41/ECM Charge of Controlled Medication Rule Violation – Rule 3312
Covered Horse: Protest**

This serves as notice to you, William E. March, that the Horseracing Integrity & Welfare Unit (“HIWU”) is imposing the following Consequences against you under the Anti-Doping and Medication Control (“ADMC”) Program pursuant to 15 U.S.C. 3057(d) as set forth in the attached Final Decision:

1. Disqualification of the results of Protest obtained in Race 7 at Tampa Bay Downs in Tampa, Florida on January 14, 2026, 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 USD pursuant to ADMC Program Rule 3323;
3. Assignment of 1.5 Penalty Points pursuant to 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 – Phenylbutazone (Class C). The Controlled Medication Substance was found to be present in a blood Sample collected from Protest after Race 7 at Tampa Bay Downs in Tampa, Florida on January 14, 2026.

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 8, 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 "M. Pujals", is written over a horizontal line.

Michelle Pujals, HIWU General Counsel

Encls.: Final Decision of HIWU
Payment Instructions for HISA Portal

cc (w/ encls.): Carla March, Owner
Florida Gaming Control Commission
HISA



FINAL DECISION OF HORSERACING INTEGRITY & WELFARE UNIT

**ECM2026-41/Controlled Medication Rule Violation/ADMC Program Rules 3312
Covered Person: William E. March
Covered Horse: Protest**

On January 14, 2026, Horseracing Integrity & Welfare Unit (“HIWU”) Sample Collection Personnel collected a blood Sample, designated as # B200053581, from Protest after Race 7 at Tampa Bay Downs in Tampa, Florida under the Anti-Doping and Medication Control (“ADMC”) Program. Protest’s A Sample was submitted to Industrial Laboratories in Denver, Colorado (“Industrial”). Industrial analyzed the A Sample in accordance with the Equine Standards for Laboratories and Accreditation and reported an Adverse Analytical Finding because it detected a metabolite of Phenylbutazone in the Sample. Phenylbutazone is a category S7, Class C Controlled Medication Substance on the Prohibited List and Technical Document-Prohibited Substances.

I. ECM Notice

On February 4, 2026, Mr. March was served an ECM Notice pursuant to ADMC Program Rule 3345 of the ADMC Program in which he was advised of: (a) the resulting potential violation of ADMC Program Rule 3312 for the Presence of a Controlled Medication Substance and/or its Metabolites or Markers in a Post-Race Sample; (b) the required Consequences for this potential violation of ADMC Program Rule 3312; (c) that he had until February 9, 2026 to request B Sample analysis; and (d) that he had until February 11, 2026 to provide HIWU with an explanation for the potential violation of ADMC Program Rule 3312.

He received the ECM Notice by email, sent to the email address provided by Mr. March in the HISA Portal. Notice by email is permitted under ADMC Program Rule 3350. Mr. March did not request B Sample analysis by February 9, 2026, and therefore waived his right for B Sample analysis pursuant to ADMC Program 3345(a)(4)(ii). On that date, Mr. March replied to the ECM Notice requesting a stay and claiming that there were errors in the Sample Collection Documentation. However, his challenge to the signatures on the Sample Collection Documentation did not have a reasonable basis. Mr. March also sent a document request to Industrial, which was outside the scope of the ADMC Program Rules. On February 12, 2026, HIWU responded that the A Sample Laboratory Documentation Package had been requested from Industrial and that no other documentation would be provided in response to Mr. March’s document request.

II. ECM Charge

On February 13, 2026, Mr. March was served an ECM Charge from HIWU, pursuant to ADMC Program Rule 3348. In that ECM Charge, he was given, under ADMC Program Rule 3348(d), until February 20, 2026 to: (a) accept the Consequences proposed by HIWU, in which case HIWU would issue a decision under ADMC Program Rule 3349; (b) seek to agree to mitigated Consequences with HIWU pursuant to ADMC Program Rule 3349, failing which the Consequences could still be disputed at a hearing; or (c) dispute or seek to mitigate the proposed



Consequences at a hearing in accordance with ADMC Program Rule 3361 and the Arbitration Procedures. Mr. March was also given the option to deny the Controlled Medication Rule Violation charged and dispute the proposed Consequences at a hearing in accordance with ADMC Program Rule 3361 and the Arbitration Procedures.

The Consequences proposed by HIWU were:

1. Disqualification of the results of Protest obtained in Race 7 at Tampa Bay Downs in Tampa, Florida on January 14, 2026, 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 USD pursuant to ADMC Program Rule 3323;
3. Assignment of 1.5 Penalty Points pursuant to ADMC Program Rule 3328; and
4. Public Disclosure in accordance with ADMC Program Rules 3620 and 3331.

On February 19, 2026, HIWU contacted Mr. March, advising him that there is no right to discovery or wide-ranging document production under the ADMC Program. He was also advised that he was required to elect whether we would sign an Admission of Equine Controlled Medication Rule Violation and Acceptance of Consequences or request a hearing before the Internal Adjudication Panel ("IAP"). As it had no basis to do so under the ADMC Program Rules, HIWU declined his request to dismiss or stay the matter.

On February 24, 2026, HIWU provided the A Laboratory Documentation Package to Mr. March and once again advised him that he was required to sign an Admission of Equine Controlled Medication Rule Violation and Acceptance of Consequences or request a hearing before the IAP. As of March 6, 2026, Mr. March has not notified HIWU of his election.

III. Imposition of Consequences

Given Mr. March's waiver of his right to a hearing, he is deemed to have admitted the charged ADMC Program Rule Violation and accepted the Consequences proposed by HIWU. Consequently, HIWU imposes the following Consequences against him under the ADMC Program, pursuant to 15 U.S.C. 3057(d):

- A. Disqualification of the results of Protest obtained in Race 7 at Tampa Bay Downs in Tampa, Florida on January 14, 2026, 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;
- B. A fine of \$500 USD pursuant to ADMC Program Rule 3323;
- C. Assignment of 1.5 Penalty Points pursuant to ADMC Program Rule 3328; and



D. Public Disclosure in accordance with ADMC Program Rules 3620 and 3331.

THE HORSERACING INTEGRITY & WELFARE UNIT
DATED: MARCH 9, 2026

TAB 18

Monica Pilarski

From: Monica Pilarski
Sent: Monday, March 9, 2026 12:21 PM
To: 'cjmarch1316@gmail.com'
Cc: Geneva Gnam; Michelle Pujals
Subject: HIWU: Amended Notice of Sanctions and Final Decision - Controlled Medication Rule Violation(s) - March, William/Protest
Attachments: 2026-03-09 Amended NOS and Final Decision Letter to March, William re Protest (w encls.).pdf

Tracking:	Recipient	Read
	'cjmarch1316@gmail.com'	
	Geneva Gnam	
	Michelle Pujals	
	Kathryn Crouse	
	Kyle Kremers	Read: 3/9/2026 12:26 PM
	Patricia A. Marquis	

Dear Mr. March,

Please see the attached Amended Notice of Sanctions and Final Decision letter regarding Controlled Medication Rule Violation(s). Please note the attached has instructions on how to pay your fine through the HISA Portal.

If you have any questions, please contact the attorney who handled your matter, Geneva Gnam, at ggnam@hiwu.org or (816) 601-6897.

Thank you,



Monica Pilarski | HIWU Legal Specialist
Horseracing Integrity & Welfare Unit
Drug Free Sport International
mpilarski@hiwu.org
Cell: (816) 601-5832
4801 Main Street, Suite 350
Kansas City, MO 64112
hiwu.org
drugfreesport.com

TAB 19

Monica Pilarski

From: Monica Pilarski
Sent: Monday, March 9, 2026 12:22 PM
To: 'cjmarch1316@gmail.com'
Cc: Geneva Gnam; Michelle Pujals
Subject: HIWU: Amended Notice of Sanctions and Final Decision - Controlled Medication Rule Violation(s) - March, William/Protest
Attachments: 2026-03-09 Amended NOS and Final Decision Letter to March, William re Protest (w encls.).pdf

Dear Ms. March,

Please see the attached Amended Notice of Sanctions and Final Decision letter to William March regarding Controlled Medication Rule Violation(s).

If you have any questions, please contact the attorney who handled this matter, Geneva Gnam, at ggnam@hiwu.org or (816) 601-6897.

Thank you,



Drug Free Sport
INTERNATIONAL™

Monica Pilarski | HIWU Legal Specialist

Horseracing Integrity & Welfare Unit

Drug Free Sport International

mpilarski@hiwu.org

Cell: (816) 601-5832

4801 Main Street, Suite 350

Kansas City, MO 64112

hiwu.org

drugfreesport.com



TAB 20

Monica Pilarski

From: Michelle Pujals
Sent: Monday, May 11, 2026 9:50 AM
To: Monica Pilarski
Subject: Fw: HISA Notice to FTC of Final Civil Sanctions
Attachments: HISA Notice to FTC of Final Civil Sanctions - William E. March.pdf

From: John Forgy <johnforgy1@gmail.com>
Sent: Monday, March 9, 2026 1:11 PM
To: cjmarch1316@gmail.com <cjmarch1316@gmail.com>
Cc: Michelle Pujals <mpujals@hiwu.org>; Kyle Kremers <kkremers@hiwu.org>; Anna Jacobs <Anna.Jacobs@hisaus.org>
Subject: HISA Notice to FTC of Final Civil Sanctions

Mr. March,

Please see the attached "HISA Notice to FTC of Final Civil Sanctions - William E. March," filed with the Federal Trade Commission (FTC) by HISA today.

With best regards,

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

This electronic mail transmission is for the use of the named individual or entity to which it is directed and may contain information that is privileged or confidential. It is not to be transmitted to or received by anyone other than the named addressee (or a person authorized to deliver it to the named addressee). It is not to be copied or forwarded to any unauthorized persons. If you have received this electronic mail transmission in error, delete it from your system without copying or forwarding it, and notify the sender of the error by replying via email, so that the address record can be corrected.



March 9, 2026

Secretary of the Federal Trade Commission
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 William E. March, who is a Covered Person under the Horseracing Integrity and Safety Act of 2020, as amended:

1. Disqualification of the results of Protest obtained in Race 7 at Tampa Bay Downs in Tampa, Florida on January 14, 2026, 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 USD pursuant to ADMC Program Rule 3323;
3. Assignment of 1.5 Penalty Points pursuant to 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

/s/ John Forgy

John L. Forgy
Counsel to HISA

cc: William E. March

Proof of Service

I hereby certify that on March 9, 2026, pursuant to Federal Trade Commission Rule of Practice §4.4(d), I transmitted this HISA Civil Sanction Notice via email to William E. March at the email address cjmarch1316@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

TAB 21

Monica Pilarski

From: Geneva Gnam <ggnam@hiwu.org>
Sent: Monday, March 16, 2026 1:46 PM
To: Carla March; billmarchtrainer@gmail.com
Cc: John Forgy
Subject: Re: Scan from Staples
Attachments: Re: Scan from Staples (5.54 KB); HISA Notice to FTC of Final Civil Sanctions - William E. March.pdf

Mr. March:

Please find the link for appeal procedures for review of final civil sanctions imposed, which was previously provided to you on March 6, 2026 (see attached). The appeal procedures are located in 16 Code of Federal Regulations Part I, Subpart T and can be found on the FTC website, available at this link:
<https://www.ftc.gov/about-ftc/bureaus-offices/office-secretary/file-documents-adjudicative-proceedings>.

You were also previously provided with the HISA Notice of Final Civil Sanctions to the FTC, which was sent to your registered HISA Portal Email Address on March 9, 2026 (attached).

Geneva

Geneva N. Gnam, Esquire | Litigation Counsel
Horseracing Integrity & Welfare Unit
Drug Free Sport International
C: (816) 601-6897
E: ggnam@hiwu.org

From: Staples Print & Marketing Services <Ccreg04@staplesbusinesscenter.com>
Sent: Saturday, March 14, 2026 1:20 PM
To: johnforgy1@gmail.com <johnforgy1@gmail.com>; Geneva Gnam <ggnam@hiwu.org>
Subject: Scan from Staples

Please find the scanned documents from Staples attached to this email. -Staples Print and Marketing Services
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.

Tuesday, March 12, 2026 thru March 14, 2026

Geneva N. Gnam, Esq
Litigation Counsel
Horseracing Integrity and Welfare Unit
Suite 350
4801 Main St
Kansas City, MO 64112-2749

Ref: William E. March Trainer
2960 Sutherland Ct
Palm Harbor, FL 34684
(727)-3655222
Horse: Protest; Notice of Alleged Positive of February 4, 2026

**Response to; HIWU'S Amended Notice of Final Civil
Sanctions Under the AMC Program; March 9, 2026**

INTRODUCTION

I deny each and every allegation charged in your correspondence since the initiation of this matter.

I. Post Race Vets List Sample

I have no record of receiving you're "**Post Race Vets List Sample**" (See line 2 in paragraph 2 of Your NOTICE OF FINAL CIVIL SANCTIONS UNDER THE ADMC PROGRAM, dated March 4, 2026 Also see line 2 in paragraph 2 of your March 9, 2026; AMENDED FINAL CIVIL NOTICE SANCTIONS UNDER THE ADMC PROGRAM).

See page 7 line 4. There is no HISA or HIWU document titled Post Race Vets List Sample.

- II. I request a hearing before a Federal Administrative Law Judge as provided in 15 U.S.C. 3058.

Please mail a copy of HISA's notice to the FTC regarding this case. Forward the names and addresses of all departments, employees and lawyers with phone numbers at their offices.

- III. I request an additional fifteen (15) day stay. The original hearing date is set for April 8, 2026. **The new date if granted would be April 23, 2026.** Please inform me of the rules for the hearing and the setting. Do you plan on an in person hearing or a telephonic hearing? Will you have a court reporter to take the testimony, questioning and response or do you plan on taping or videoing the hearing? Please let me know ASAP. I will advise you of my preference or I may bring a court reporter or videographer.
- IV. Please copy me with the titles of all law suits filed against HISA/HIWU Including PENDING AND SETTLED, STATE AND FEDERAL. The addresses and case numbers of the courts and cases. What is the present status of these cases?
- V. The beginning and recovery dates of President Donald Trumps illness with Covid. The date he and his office were properly informed of the intentions of certain politicians starting a **private** thoroughbred racing company or **intity** to be known as HISA/HIWU.

A history of the medical conditions of Senator Mitch McConnell of Kentucky. The date he resigned his leadership position in the senate. The diagnosis of his mental condition including his ability to reason. Please send a copy of his attendance records that are required for his position and reasons for any missing dates. Include copies of his speeches before congress and his voting record for the past four years. Include the dates and copies of the sessions where he couldn't physically speak. Please supply the same voting records for Federal Senators from Kentucky, Florida and Texas for the same period.

Include the record of all Federal Legislators who spoke for and voted for the establishment of HISA and HIWU.

Supply a list of all Federal and State Congressmen and women who voted for and spoke out for the establishment of such an organization with a copy of the Federal Law providing for the establishment of HIWU and HISA (please include their office phone number and mailing business address).

- VI.** Please supply a paper trail of all voting on HISA/HIWU business in Federal Congress.
- VII.** Please supply the headings, filing numbers and addresses of all government businesses that house the law suits that have been filed against HISA and HIWU.

***** Please get these items to me before the Civil Sanction Hearing in time to review*****

SINCERELY,

William E. March

WILLIAM E. MARCH, TRAINER
2960 Sutherland Court
Palm Harbor, Florida 34684
(727)365-5222
License #302380

Cc: CARLA MARCH, OWNER

John L. Forgy
Council to HISA
630 Vermillion Peak Pass
Lexington, Kentucky 40515
(859) 940-1215
johnforgy1@gmail.com

Michelle Pujals
HIWU General Council
NO EMAIL GIVEN (W)

GENEVA N. GNAM, ESQ.
ggnam@hiwu.org

Timothy Kruegar
Industrial Laboratories
www.industriallabs.net/terms and www.industriallabs.net

Office of Florida Governor

Ron Disantis

Desantis.opengov@eg.myflorida.com

Monica Pīlarski

mpilarski@hiwu.com

Copy attached: March 9, 2026 electronic files
from John Forgy, Council for HISA (Email john.forgy1@gmail.com)
(u) T-1 for Training Exhibit One (i)



**HORSERACING INTEGRITY
AND SAFETY AUTHORITY**

March 9, 2026

Secretary of the Federal Trade Commission
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 William E. March, who is a Covered Person under the Horseracing Integrity and Safety Act of 2020, as amended:

1. Disqualification of the results of Protest obtained in Race 7 at Tampa Bay Downs in Tampa, Florida on January 14, 2026, 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 USD pursuant to ADMC Program Rule 3323;
3. Assignment of 1.5 Penalty Points pursuant to 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

/s/ John Forgy

John L. Forgy
Counsel to HISA

cc: William E. March

T-1

Proof of Service

I hereby certify that on March 9, 2026, pursuant to Federal Trade Commission Rule of Practice §4.4(d), I transmitted this HISA Civil Sanction Notice via email to William E. March at the email address cjmarch1316@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

TAB 22

Monica Pilarski

From: Carla March <cjmarch1316@gmail.com>
Sent: Wednesday, March 25, 2026 10:48 PM
To: mpilarski@hiwu.org
Subject: Prot est litigation
Attachments: Thursdday, March 19, 2026 Letter to HISA Reference Pay Fine and notice of Unconstitutionally Legislated Federal Agency.docx

Thursday, March 19, 2026. Thru Wednesday, March 25, 2026

To: John L. Forgy, Esq.
HISA Attorney
830 Vermillion Peak Pass
Lexington, Kentucky
(859)940-1215
Email: johnforgy1@gmail.com

Michelle Pujals
HIWU General Council
Horseracing Integrity & Welfare Unit
4801 Main Street,
Suite 350
Kansas City, Missouri 64112-2745
(816) 285-1425
EMAIL Not Known

Request Dismissal of HIWU's Charges
of February, 13, 2026

On the following four dates I received the documents listed below (1-4) from HIWU with attachments from HISA (some correspondence has headings from both).

- 1. February. 4, 2026: Re: ECM Notice of Alleged Controlled Medication Violation, Covered Horse: Protest, Sample #B20005381. From: Geneva N. Knam, Esq. of HIWU**
 - a. Included: Sample Collection Form dated 01/14/2026.
 - b. Included: Certificate of Analysis Form dated 1/29/2026
 - c. Included: HISA-Covered Person Pro Bono Form

d. Received Gmail on **February 12, 2026** at 6:10 PM from Monica Pilarski , HIWU to Carla March. The last two lines read, “Apart from the above, HIWU will not be providing any of the documentation requested as the requests are outside the scope of ADMC Program Rules. A charge letter will be issued tomorrow, which will detail your options moving forward.”

The request would NOT be outside the scope of a Local, State or Federal agency. A simple Public Records Request would supply most records. There are exceptions like medical records and sexual assault records and some others.

2. February 13, 2026: ECM “Charge” of Controlled Medication Rule Violation, Covered Horse: Protest, Sample #B200053581. From: Geneva N. Gnam, Esq. of HIWU

a. Included: HISA-Covered Person Pro Bono Program Form.

3. March 4, 2026: “NOTICE” OF FINAL CIVIL SANCTIONS” UNDER THE ADMC PROGRAM. RE: ECM2026-41/ECM Charge of Controlled Medication Rule Violation-Rule 3312 Covered Horse: Protest. From: HIWU: Michelle Pujals, General Council

a. Included: HISA-Fine Payment Instructions
b. March 6, 2026 at 8:11 AM Gmail received Geneva N. Gnam, esq. ...**“the appeal procedures...16 Code of Federal Regulations Part I, Subpart T...**

*****No Lawful Notice to the Federal Trade Commission as directed by Rule 16 CFR PART 1*****

**FEDERAL TRADE COMMISSION
16 CFR PART 1**

Procedures for Review of Final Civil Sanctions imposed Under the Horseracing Integrity and Safety Act

Procedures for Review of Final Civil Sanctions Under the Horseracing integrity and Safety Act

AGENCY: Federal Trade Commission.

ACTION: FINAL rule.

SUMMARY: To implement the Horseracing Integrity and Safety Act of 2020, The Federal Trade Commission issues a final rule to establish procedures for the review by an Administrative Law Judge of final civil sanctions imposed by the Horseracing Integrity and Safety Authority and the review by the Commission of the decision of the Administrative Law Judge.

I. Background on Horseracing Integrity and Safety Act

The Horseracing Integrity and Safety Act of 2020 (“Act”),¹ enacted on December 27, 2020, directs the Federal Trade Commission (“Commission”) to oversee the activities of a private, **self**-regulatory organization called the Horseracing Integrity and Safety Authority (“Authority”).....The violations are determined through a

disciplinary process governed by 15 U.S.C. 3057(c).....

¹ 15 U.S.C. 3051 through 3060

II. Contents of the Final Rule

A. Section 1.145-Submission of Notice of Civil Sanction

The Act, in 15 U.S.C. 3058(a), requires the Authority to “promptly to the Commission notice” of a final civil sanction” the Authority has imposed against a “covered person”² for a violation of the rules or standards of the Authority.³ The notice is to be provided in a format specified by the Commission. The final rule describes the contents of the notice, defines “promptly” as within two days, and specifies the manner of submission.

Subpart T-Procedures for Review of Final Civil Sanctions Imposed under the Horseracing Integrity and Safety Act.

§Sec 1.145 Submission of Notice of civil sanctions.

(a) Requirements to file. If the Horseracing Integrity and Safety Authority (Authority) imposes a final civil sanction under 15 U.S.C. 3057(d) for a covered person’s violation of a rule of the Authority, the Authority must submit notice of the sanction to the Federal Trade Commission

(Commission) no later than two days after the sanction has been issued for the sanction to be enforceable.

*****Not included in the package of March 4, 2026 was a copy of Email Notice sent to the Federal Trade Commission regarding a positive finding of Sample #B20053581 by HISA, HIWU, Industrial Laboratories of Kansas City, MO or any private industry or person as required by 15 U.S.C. 3057(d) and §1.45*****

4. March 9, 2026: “AMENDED NOTICE” OF FINAL CIVIL SANCTIONS UNDER THE ADMC PROGRAM. RE: ECM2026-41/ECM Charge of Controlled Medication Rule Violation-Rule 3312 Covered Horse: Protest.

- a. Included HISA-Fine Payment Instructions
- b. **AMENDED NOTICE OF FINAL CIVIL SANCTIONS UNDER THE ADMC PROGRAM** dated March 9, 2026 was Emailed to William E. March via cjmarsh1316@gmail.com his wife, arriving at 8:45P.M., **3/10/2026**

March 9, 2026 (Emailed March 10, 2026) page 4 of “AMENDED NOTICE”

III. Imposition of Consequences. FINE PAYMENT INSTRUCTIONS FROM HISA WAS ON THE 6TH Page (unmarked back of page 5) of the DOCUMENT. Date Emailed from HIWU was “**March 10, 2026**”.

Also Emailed on **March 10, 2026** ,dated **March. 9, 2026**, was a letter titled “**Secretary of the Federal Trade Commission**” signed by John Forgy Counsel to HISA not HIWU. This date was **Four (4) days after the due date** of

“March 6, 2026”. (See John L. Forgy’s Proof of Service letter to cjmarch1316@gmail.com. Dated March 9, 2026

Again ,this **Notice** was titled **Amended Notice of Final Sanctions** document dated **“March 9, 2026”**, again **five days after the due date**, **“Notice of Final Sanctions”**; dated **“March 4, 2026”**. *****See 3 #above.*****

CLOSING

MOVE FOR DISMISSAL OF CHARGES FOR HISA’S AND OR HIWU’S FAILURE TO NOTICE THE FEDERAL TRADE COMMISSION TIMELY BY MARCH 6, 2026 OF THEIR FINAL ACTIONS IN THIS MATTER (THEIR NOTICE). THERE IS NO PROOF OF MAILING THE NOTICE OF FINAL SANCTIONS IN THE RECORD.

THERE IS A DOCUMENT allegedly MAILED ON MARCH 9, 2026 TITLED: “AMENDED” NOTICE OF FINAL CIVIL SANCTIONS UNDER THE ADMC PROGRAM (See numbers 3 & 4 above).

THE HISA AMENDED NOTICE IN NUMBER 4 ABOVE WAS LATE. See 15 U.S.C. 3057(d).

CIVIL SANCTION NOTICE

Safety Act§ 1.145: Submission of Notice of civil sanctions
Authority : 15 U.S.C. 3058

(a) Requirement to file. If the Horseracing Integrity and Safety Authority (Authority) imposes a final civil action under 15 U.S.C. 3057(d) for a covered person’s violation of a rule of the Authority, the Authority must submit notice of the sanction to the Federal Trade Commission

(Commission) no later than two days after the sanction has been issued for the sanction to be enforceable.

HIWU'S NOTICE TO THE FEDERAL TRADE COMMISSION WAS THREE DAYS LATE THEREFOR AUTOMATICALLY UNENFORCEABLE.

If HIWU'S and HISA's employees refuse to recognize the illegal action that was taken, I request a hearing before the Commission or Hearing Officer, whichever is the next legal appellate step if this charge is not dropped. I reserve the right take another legal avenue according to HIWU and HISA's response.

However, again, this. Case should be legally dropped. It is ripe for dismissal.

Sincerely,

William E. March
Licensed Thoroughbred Horse Trainer
Florida License #302380
2960 Sutherland Court
Palm Harbor, Florida 34684
(727) 365-5222
[Billmarchtrainer@gmail.c](mailto:Billmarchtrainer@gmail.com) om
cjmarch1316@gmail.com

Cc: Carla March at home address

SEE page 4,5,6 for Cc's

Monica Pilarski
HIWU Legal Assistant
mpilarski@hiwu.org

Geneva Gnam
Litigation Counsel
Horseracing Integrity & Welfare Unit
ggnam@hiwu.org

Timothy Kruegar
Industrial Laboratories
tkruegar@industriallaboratories.net

Office of Florida Governor
Ron Desantis
Desantis.open gov@eg.myflorida.com
The Capitol
400 S. Monroe Street
Tallahassee, Florida 32399

Michelle Pujals
HIWU General Counsel
c/o Geneva Gnam

Office of Attorney General
State of Florida
The Capital PL-01
Tallahassee, FL 32399-1050
Email: MyFloridaLegal.com

State of Florida

Dept. of Legal Affairs
Attn: ADA
Complaint Coordination
Capital PL-01
Tallahassee, FL. 32399-1056

Florida Division of Pari-Mutuel Wagering
Florida Gaming Control Commission
Executive Branch
Director Joe Dillmore
ATTN: Glenda Ricks
Chief Operating Officer
4070 Esplanade Way
Suite 250
TallaHASSEE, FL 32399
Email: joe.dillmore@flgaming.gov
Email: glenda.ricks@flgaming.gov
Email: Bradford.Jones@flgaming.gov

Chief Investigator
1400 West Commercial Blv d.
Suite 1656
Ft. Lauderdale, FL 33309-3787
(754) 288-1055

The Texas Thoroughbred Association
192 Cimarron Park Loop, Suite A
Buda, Texas 78610
(512). 458-6133
Fax (512) 453-5919
Email Executive Director: tracys@texasthorougbred.com
Horsemen's Benevolent & Protective Association
Dave Basler, Executive Director
Ohio Division

3860 Broadway
Grove City, Ohio 43123
(800)321-8367
Fax: (614) 875-0786
Email: ohio-hbpa@rrohio.com

TAB 23

Monica Pilarski

From: Geneva Gnam
Sent: Thursday, March 26, 2026 7:19 AM
To: Carla March
Cc: William March; Monica Pilarski
Subject: Re: Protest litigation
Attachments: Thursdday, March 19, 2026 Letter to HISA Reference Pay Fine and notice of Unconstitutionally Legislated Federal Agency.docx; Re: Scan from Staples; Re: Scan from Staples; Re: Scan from Staples

Good morning,

HIWU is not dismissing this matter, which has already been finalized.

Please find the link for appeal procedures for review of final civil sanctions imposed, which was previously provided to you on March 6, 2026, March 16, 2026, and March 25, 2026 (see attached). The appeal procedures are located in 16 Code of Federal Regulations Part I, Subpart T and can be found on the FTC website, available at this link: <https://www.ftc.gov/about-ftc/bureaus-offices/office-secretary/file-documents-adjudicative-proceedings>.

Geneva

Geneva N. Gnam, Esquire | Litigation Counsel
Horsing Integrity & Welfare Unit
Drug Free Sport International
C: (816) 601-6897
E: ggnam@hiwu.org

From: Carla March <cjmarch1316@gmail.com>
Sent: Wednesday, March 25, 2026 10:45 PM
To: Geneva Gnam <ggnam@hiwu.org>
Subject: Protest litigation

TAB 24

Monica Pilarski

From: Carla March <cjmarch1316@gmail.com>
Sent: Wednesday, April 1, 2026 9:50 PM
To: mpilarski@hiwu.org
Subject: In the matter of William E March
Attachments: Carla.docx

attachment

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Rebecca Kelly Slaughter, Acting Chair Woman
Noah Joshua Phillips
Rohit Copra Chopra
Christine S. Wilson

IN THE MATTER OF:

William E. March, Trainer
Sample #B200053581
Covered Horse: "PROTEST"
Tampa Bay Downs
Race #7: February 14, 2026

REQUEST FOR DISMISSAL OF CHARGES

**Subpart T-Procedures for Review of Final Civil
Sanctions Imposed under the Horseracing and Safety
Act.**

Request to Dismiss Alleged Charges for Violation of the Safety
Act §1.145

**§Sec 1.145 Submission of Notice of civil
sanctions.**

- (a) Requirements to file. If the Horseracing Integrity and Safety Authority (Authority) imposes a final civil sanction under 15 U.S.C. 3057(d) for a covered person’s violation of a rule of the Authority, the Authority must submit notice of the sanction to the Federal Trade Commission (Commission) no later than two days after the sanction has been issued “for the sanction to be enforceable.”**

See page 5 number 4, “AMENDED NOTICE” OF FINAL SANCTIONS UNDER THE ADMC PROGRAM. Sent to The Federal Trade Commission in 4 to 5 days instead of the required 2 days. Any sanction by HISA or HIWU “is not enforceable.”

Dates

1. February 4, 2026: ECM Notice of Alleged Controlled Medication Rule Violation. Results Management of this matter is the responsibility of HIWU.

2. February 7, 2026: Response to ECM Notice of Alleged Medication Rule Violation of issued February 4, 2026. Move for immediate stay.

3. February 11, 2026: Request for Production to laboratory chemist, Timothy R. Kruegar.

4. February 12, 2026: Received Gmail from Geneva Gnam,, Esquire, Litigation Counsel for HIWU. "Apart from the above, HIWU will not be providing any of the documentation requested as the requests are outside the scope of ADCMC Program Rules. A Charge Letter will be issued tomorrow, which will detail your options moving forward."

5. February 17, 2026: Request Dismissal of HIWU's Charges of February 13, 2026. Gmail from Geneva Gnam to Monica Pilarski, legal assistant of HIWU and copied to Carla March The last two lines read : "Apart from the above, HIWU will not be providing any of the documentation requested as the requests are outside the scope of ADCM Program Rules. A charge letter will be issued tomorrow, which will detail your options moving forward."

6. February 17, 2026: Letter to Geneva N. Gnam : to HIWU Letter of February 13, 2026. Titled: REQUSET FOR DISMISSAL OF CHARGES.

7. February 19, 2026: GMAIL from Geneva Gnam to Carla March, Copied to Monica Pilarski. "As HIWU indicated in the attached email on February 12, 2026, Industrial Laboratories will not separately respond to your requests or your inquires Any requests for documentation must go through HIWU."

8. March 4, 2026: RESPONSE TO FEBRUARY 13, 2026: ECM Charge of Controlled Medication Rule Violation, Covered Horse: Protest; Sample #B200053581 to Geneva N. Gnam, Esq. "The Florida Department of Pari-Mutuel Wagering is the Florida state organization that was recently bullied by misguided Federal Legislatures (legislators) out of their state responsibilities."

9. March 4, 2026: "HIWU's NOTICE" OF FINAL CIVIL SANCTIONS UNDER THE ADMC PROGRAM. **Pursuant to 15 U.S.C. 3058(b)(1), review of the decision must be requested within (30) days of HISA's notice to the FTC.**

10. March 9, 2026: HIWU's AMENDED NOTICE OF FINAL CIVIL. SANCTIONS UNDER THE ADMC PROGRAM. **Pursuant to 15 U.S.C. 3058(b)(1), review of the decision must be requested**

within (30) days of HISA's notice to the FTC. Copy of HISA, March 9, 2026: Civil Sanction Notice to the Federal Trade Commission from. John L. Forgy, Counsel to HISA.

11. March 25, 2026 titled, Request Dismissal of HIWU's Charges of February 13, 2026: (7 pages).

12. Also, attached is a copy of the letter dated March 9, 2026

BEFORE THE FEDERAL TRADE COMMISSION

February 4, 2026: Notice of Alleged Controlled Medication.

Federal Trade Commission

- a. Notice Letter from John L. Forgy Lawyer, Counsel to HISA to Secretary of of Federal Trade Commission
- b. HISA is a private organization.

MARCH 4, 2026: RESPONSE TO: FEBRUARY 13, 2026; ECM Charge of Controlled Medication Rule Violation, Covered Horse: Protest; Sample #B200053581.

- c. No Constitutional Rights given in writing or orally by a representative of HISA, HIWU or the Federal Trade Commission.

Short Review

Thoroughbred Race Horse named Protest won the seventh race at Tampa Bay Downs Race Course ,“on January 14, 2026. Protest was taken directly to the Test Barn by a Florida licensed groom Roberto Mader. The employees of the Florida Department of Business and Professional Regulations, at the test barn, reportedly took samples of urine and blood from “Protest” to ship for analysis. Some the Test Barn employees only initialed the Sample Collection Form, no readable signature. The Blood SAMPLE Identification Label was #B200053581. The owner of the horse Protest, Carla March, wife, received the winning purse a few days later. The new Independent agency, HIWU, is attempting to have the Trainer, William E. March return the winnings for the alleged positive post race test for a legal substance Phenylbutazone. The use of Phenylbutazone has been proven safe and approved for use in Florida before January 2016. However, HIWU did not follow their own rules, they demanded the purse be returned before proving a violation had occurred.

Type equation here.

Florida Licensed Thoroughbred Horse Trainer

/s/ William E. March

William E. March

Florida License # 302380
2960 Sutherland Court
Palm Harbor, FL 34684
(727) 365-5222

Cc: Carla March

Office of the Secretary
Federal Trade Commission
Constitution Center
400 Seventh Street, Suite 5610
Washington, D.C. 20024
Mailed
(202) 326-2222

400 7th Street., SW
Washington, DC 20580
Emailed to: ftc.gov/abo

Geneva Gnam
Litigation Counsel
Fax: (816)285-1433
ggnam@hiwu.org

Monica Pilarski
HIWU Legal Assistant
mpilarski@hiwu.org

Office of Florida Governor
Ron DeSantis
gov@eg.myflorida.com

Office of Attorney General
State of Florida
The Capitol PL-01
Tallahassee, FL 32399-1050
Email: MyFloridaLegal.com

Florida Division of Pari-Mutuel Wagering
glenda ricks@flgaming.gov

Texas Thoroughbred Association
tracys@texasthoroughbred.com

Dave Baesler
Executive Director
Ohio HBPA
Fax: (614) 321-0786
Email: ohio-hbpa@rrOhio.com

TAB 25

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Rebecca Kelly Slaughter, Acting Chair Woman
Noah Joshua Phillips
Rohit Copra Chopra
Christine S. Wilson

IN THE MATTER OF:

William E. March, Trainer
Sample #B200053581
Covered Horse: "PROTEST"
Tampa Bay Downs
Race #7: February 14, 2026

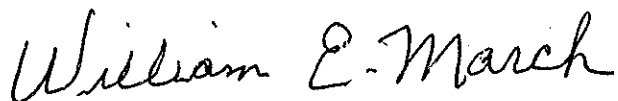
TO: THE UNITED STATES FEDERAL TRADE COMMISSION
OFFICE OF THE SECRETARY
CONSTITUTION CENTER
400 SEVENTH STREET, SUITE 5610
WASHINGTON, D.C. 20024
Mailed April 10, 2026
Emailed April 10, 2026 to ftc.gov/abo
Original Mailing: U.S. Mail 04/01/2026

Dear Commissioners,

This is my second mailing of the document titled REQUEST FOR DISMISSAL OF CHARGES concerning Case #B200053581.

As of the date of this correspondence I have not received a response from HISA, HIWU or The Federal Trade Commission. Please respond.

Sincerely,



William E. March
Thoroughbred Horse Trainer
Florida License # 302380
2960 Sutherland Court 34684
(727) 365-5222

Attachments: **1.** Copy of Request for Dismissal of Charges
of 04/01/2026 Letter to The United States of
America Federal Trade Commission
2. Copy of prior Mailing Receipt from U.S. Postal
Service dated 04/01/2026; Tracking Number 9505

5141 6294 6091 1538 19; Copy pf Postal Receipt
Attached As A-1.

3. Copy of Request Dismissal of HIWU's
Charges of February 13, 2026

Cc: Carla March

Office of the Secretary
Federal Trade Commission
Constitution Center
400 Seventh Street, Suite 5610
Washington, D.C. 20024
Mailed
(202) 326-2222

400 7th Street., SW
Washington, DC 20580
Emailed to: ftc.gov/abo

Geneva Gnam
Litigation Counsel
Fax: (816)285-1433
ggnam@hiwu.org

Monica Pilarski
HIWU Legal Assistant
mpilarski@hiwu.org

Office of Florida Governor
Ron DeSantis
gov@eg.myflorida.com

Office of Attorney General
State of Florida
The Capitol PL-01
Tallahassee, FL 32399-1050
Email: MyFloridaLegal.com

Florida Division of Pari-Mutuel Wagering
glenda_ricks@flgaming.gov

Texas Thoroughbred Association
tracys@texasthoroughbred.com

Dave Baesler
Executive Director
Ohio HBPA
Fax: (614) 321-0786
Email: ohio-hbpa@rrOhio.com

A-1

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Rebecca Kelly Slaughter, Acting Chair Woman
Noah Joshua Phillips
Rohit Copra Chopra
Christine S. Wilson

IN THE MATTER OF:

William E. March, Trainer
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Covered Horse: "PROTEST"
Tampa Bay Downs
Race #7: February 14, 2026

REQUEST FOR DISMISSAL OF CHARGES

**Subpart T-Procedures for Review of Final Civil
Sanctions Imposed under the Horseracing and Safety
Act.**

Request to Dismiss Alleged Charges for Violation of the Safety
Act §1.145

**§Sec 1.145 Submission of Notice of civil
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2. February 7, 2026: Response to ECM Notice of Alleged Medication Rule Violation of issued February 4, 2026. Move for immediate stay.
3. February 11, 2026: Request for Production to laboratory chemist, Timothy R. Kruegar.
4. February 12, 2026: Received Gmail from Geneva Gnam,, Esquire, Litigation Counsel for HIWU. "Apart from the above, HIWU will not be providing any of the documentation requested as the requests are outside the scope of ADCM Program Rules. A Charge Letter will be issued tomorrow, which will detail your options moving forward."
5. February 17, 2026: Request Dismissal of HIWU's Charges of February 13, 2026. Gmail from Geneva Gnam to Monica Pilarski, legal assistant of HIWU and copied to Carla March The last two lines read : "Apart from the above, HIWU will not be providing any of the documentation requested as the requests are outside the scope of ADCM Program Rules. A charge letter will be issued tomorrow, which will detail your options moving forward."

6. February 17, 2026: Letter to Geneva N. Gnam : to HIWU Letter of February 13, 2026. Titled: REQUSET FOR DISMISSAL OF CHARGES.

7. February 19, 2026: GMAIL from Geneva Gnam to Carla March, Copied to Monica Pilarski. "As HIWU indicated in the attached email on February 12, 2026, Industrial Laboratories will not separately respond to your requests or your inquires. Any requests for documentation must go through HIWU."

8. March 4, 2026: RESPONSE TO FEBRUARY 13, 2026: ECM Charge of Controlled Medication Rule Violation, Covered Horse: Protest; Sample #B200053581 to Geneva N. Gnam, Esq. "The Florida Department of Pari-Mutuel Wagering is the Florida state organization that was recently bullied by misguided Federal Legislatures (legislators) out of their state responsibilities."

9. March 4, 2026: "HIWU's NOTICE" OF FINAL CIVIL SANCTIONS UNDER THE ADMC PROGRAM. **Pursuant to 15 U.S.C. 3058)b)(1), review of the decision must be requested within (30) days of HISA's notice to the FTC.**

10. March 9, 2026: HIWU's AMENDED NOTICE OF FINAL CIVIL. SANCTIONS UNDER THE ADMC PROGRAM. **Pursuant to 15 U.S.C. 3058(b)(1), review of the decision must be requested**

within (30) days of HISA's notice to the FTC. Copy of HISA, March 9, 2026: Civil Sanction Notice to the Federal Trade Commission from. John L. Forgy, Counsel to HISA.

11. March 25, 2026 titled, Request Dismissal of HIWU's Charges of February 13, 2026: (7 pages).

12. Also, attached is a copy of the letter dated March 9, 2026

BEFORE THE FEDERAL TRADE COMMISSION

February 4, 2026: Notice of Alleged Controlled Medication.

Federal Trade Commission

- a. Notice Letter from John L. Forgy Lawyer, Counsel to HISA to Secretary of Federal Trade Commission
- b. HISA is a private organization.

MARCH 4, 2026: RESPONSE TO: FEBRUARY 13, 2026; ECM Charge of Controlled Medication Rule Violation, Covered Horse: Protest; Sample #B200053581.

- c. No Constitutional Rights given in writing or orally by a representative of HISA, HIWU or the Federal Trade Commission.

Review

Thoroughbred Race Horse named "Protest" won the seventh race at Tampa Bay Downs Race Course , "on January 14, 2026. "Protest"

was taken directly to the Test Barn by a Florida licensed groom signed in as Roberto Mader. The employees of the Florida Department of Business and Professional Regulations, at the test barn, reportedly took samples of urine and blood from "Protest" to ship for analysis. Some the Test Barn employees only initialed the Sample Collection Form, no readable signature. The Blood SAMPLE Identification Label was #B200053581. The owner of the horse "Protest", Carla March, wife, received the winning purse a few days later. The new Independent agency, HIWU, is attempting to have the Trainer, William E. March return the winnings for the alleged positive post race test finding for a legal substance Phenylbutazone. The use of Phenylbutazone has been proven safe and approved for use in Florida before January 2016. However, HIWU did not follow their own rules, they demanded the purse be returned before proving a violation had occurred.

Sincerely,



William E. March

Florida License # 302380

2960 Sutherland Court

Palm Harbor, FL 34684

(727) 365-5222

Cc: Carla March

Office of the Secretary
Federal Trade Commission
Constitution Center
400 Seventh Street, Suite 5610
Washington, D.C. 20024
Mailed
(202) 326-2222

400 7th Street., SW
Washington, DC 20580
Emailed to: ftc.gov/abo

Geneva Gnam
Litigation Counsel
Fax: (816)285-1433
ggnam@hiwu.org

Monica Pilarski
HIWU Legal Assistant
mpilarski@hiwu.org

Office of Florida Governor
Ron DeSantis
gov@eg.myflorida.com

Office of Attorney General
State of Florida
The Capitol PL-01
Tallahassee, FL 32399-1050
Email: MyFloridaLegal.com

Florida Division of Pari-Mutuel Wagering
glenda_ricks@flgaming.gov

Texas Thoroughbred Association
tracys@texasthoroughbred.com

Dave Baesler
Executive Director
Ohio HBPA
Fax: (614) 321-0786
Email: ohio-hbpa@rrOhio.com

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A-2



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Tracking #: 9505 5141 6294 6091 1538 19			\$0.00
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 Clerk: 35

A-3

Thursday, March 19, 2026. Thru Wednesday, March 25, 2026

**To: John L. Forgy, Esq.
HISA Attorney
830 Vermillion Peak Pass
Lexington, Kentucky
(859)940-1215
Email: johnforgy1@gmail.com**

**Michelle Pujals
HIWU General Council
Horseracing Integrity & Welfare Unit
4801 Main Street,
Suite 350
Kansas City, Missouri 64112-2745
(816) 285-1425
EMAIL Not Known**

**Request Dismissal of HIWU's Charges
of February, 13, 2026**

On the following four dates I received the documents listed below (1-4) from HIWU with attachments from HISA (some correspondence has headings from both).

- 1. February, 4, 2026: Re: ECM Notice of Alleged Controlled Medication Violation, Covered Horse: Protest, Sample #B20005381. From: Geneva N. Knam, Esq. of HIWU**
 - a. Included: Sample Collection Form dated 01/14/2026.
 - b. Included: Certificate of Analysis Form dated 1/29/2026
 - c. Included: HISA-Covered Person Pro Bono Form

d. Received Gmail on **February 12, 2026** at 6:10 PM from Monica Pilarski , HIWU to Carla March. The last two lines read, “Apart from the above, HIWU will not be providing any of the documentation requested as the requests are outside the scope of ADMC Program Rules. A charge letter will be issued tomorrow, which will detail your options moving forward.”

The request would NOT be outside the scope of a Local, State or Federal agency. A simple Public Records Request would supply most records. There are exceptions like medical records and sexual assault records and some others.

2. February 13, 2026: ECM “Charge” of Controlled Medication Rule Violation, Covered Horse: Protest, Sample

#B200053581. From: Geneva N. Gnam, Esq. of HIWU

a. Included: HISA-Covered Person Pro Bono Program Form.

3. March 4, 2026: “NOTICE” OF FINAL CIVIL SANCTIONS” UNDER THE ADMC PROGRAM. RE: ECM2026-41/ECM Charge of Controlled Medication Rule Violation-Rule 3312 Covered Horse: Protest. From: HIWU: Michelle Pujals, General Council

a. Included: HISA-Fine Payment Instructions

b. March 6, 2026 at 8:11 AM Gmail received Geneva N. Gnam, esq. ...**“the appeal procedures...16 Code of Federal Regulations Part I, Subpart T...**

*****No Lawful Notice to the Federal Trade Commission as directed by Rule 16 CFR PART 1*****

**FEDERAL TRADE COMMISSION
16 CFR PART 1**

Procedures for Review of Final Civil Sanctions imposed Under the Horseracing Integrity and Safety Act

Procedures for Review of Final Civil Sanctions Under the Horseracing integrity and Safety Act

AGENCY: Federal Trade Commission.

ACTION: FINAL rule.

SUMMARY: To implement the Horseracing Integrity and Safety Act of 2020, The Federal Trade Commission issues a final rule to establish procedures for the review by an Administrative Law Judge of final civil sanctions imposed by the Horseracing Integrity and Safety Authority and the review by the Commission of the decision of the Administrative Law Judge.

I. Background on Horseracing Integrity and Safety Act

The Horseracing Integrity and Safety Act of 2020 (“Act”),¹ enacted on December 27, 2020, directs the Federal Trade Commission (“Commission”) to oversee the activities of a private, **self**-regulatory organization called the Horseracing Integrity and Safety Authority (“Authority”).....The violations are determined through a

disciplinary process governed by 15 U.S.C. 3057(c).....

¹ 15 U.S.C. 3051 through 3060

II. Contents of the Final Rule

A. Section 1.145-Submission of Notice of Civil Sanction

The Act, in 15 U.S.C. 3058(a), requires the Authority to “promptly to the Commission notice” of a final civil sanction” the Authority has imposed against a “covered person”² for a violation of the rules or standards of the Authority.³ The notice is to be provided in a format specified by the Commission. The final rule describes the contents of the notice, defines “promptly” as within two days, and specifies the manner of submission.

Subpart T-Procedures for Review of Final Civil Sanctions Imposed under the Horseracing Integrity and Safety Act.

§Sec 1.145 Submission of Notice of civil sanctions.

(a) Requirements to file. If the Horseracing Integrity and Safety Authority (Authority) imposes a final civil sanction under 15 U.S.C. 3057(d) for a covered person’s violation of a rule of the Authority, the Authority must submit notice of the sanction to the Federal Trade Commission

(Commission) no later than two days after the sanction has been issued for the sanction to be enforceable.

*****Not included in the package of March 4, 2026 was a copy of Email Notice sent to the Federal Trade Commission regarding a positive finding of Sample #B20053581 by HISA, HIWU, Industrial Laboratories of Kansas City, MO or any private industry or person as required by 15 U.S.C. 3057(d) and §1.45*****

4. March 9, 2026: “AMENDED NOTICE” OF FINAL CIVIL SANCTIONS UNDER THE ADMC PROGRAM. RE: ECM2026-41/ECM Charge of Controlled Medication Rule Violation-Rule 3312 Covered Horse: Protest.

- a. Included HISA-Fine Payment Instructions
- b. **AMENDED NOTICE OF FINAL CIVIL SANCTIONS UNDER THE ADMC PROGRAM** dated March 9, 2026 was Emailed to William E. March via cjrmarch1316@gmail.com his wife, arriving at 8:45P.M., **3/10/2026**

March 9, 2026 (Emailed March 10, 2026) page 4 of “AMENDED NOTICE”

III. Imposition of Consequences. FINE PAYMENT INSTRUCTIONS FROM HISA WAS ON THE 6TH Page (unmarked back of page 5) of the DOCUMENT. Date Emailed from HIWU was “March 10, 2026”.

Also Emailed on **March 10, 2026**, dated **March. 9, 2026**, was a letter titled “**Secretary of the Federal Trade Commission**” signed by John Forgy Counsel to HISA not HIWU. This date was **Four (4) days after the *due* date of**

“March 6, 2026”.(See John L. Forgy’s Proof of Service letter to cjmarch1316@gmail.com. Dated March 9, 2026

Again ,this **Notice** was titled **Amended Notice of Final Sanctions** document dated **“March 9, 2026”**, again **five days after the due date, “Notice of Final Sanctions”**; dated **“March 4, 2026”**. *****See 3 #above.*****

CLOSING

MOVE FOR DISMISSAL OF CHARGES FOR HISA’S AND OR HIWU’S FAILURE TO NOTICE THE FEDERAL TRADE COMMISSION TIMELY BY MARCH 6, 2026 OF THEIR FINAL ACTIONS IN THIS MATTER (THEIR NOTICE). THERE IS NO PROOF OF MAILING THE NOTICE OF FINAL SANCTIONS IN THE RECORD.

THERE IS A DOCUMENT allegedly MAILED ON MARCH 9, 2026 TITLED: “AMENDED” NOTICE OF FINAL CIVIL SANCTIONS UNDER THE ADMC PROGRAM (See numbers 3 & 4 above).

THE HISA AMENDED NOTICE IN NUMBER 4 ABOVE WAS LATE. See 15 U.S.C. 3057(d).

CIVIL SANCTION NOTICE

Safety Act§ 1.145: Submission of Notice of civil sanctions
Authority : 15 U.S.C. 3058

(a) Requirement to file. If the Horseracing Integrity and Safety Authority (Authority) imposes a final civil action under 15 U.S.C. 3057(d) for a covered person’s violation of a rule of the Authority, the Authority must submit notice of the sanction to the Federal Trade Commission

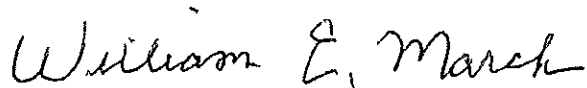
(Commission) **no later than two days after the sanction has been issued for the sanction to be enforceable.**

HIWU'S NOTICE TO THE FEDERAL TRADE COMMISSION WAS THREE DAYS LATE THEREFOR **AUTOMATICALLY UNENFORCEABLE.**

If HIWU'S and HISA'S employees refuse to recognize the illegal action that was taken, **I request a hearing before the Commission or Hearing Officer, whichever is the next legal appellate step if this charge is not dropped. I reserve the right take another legal avenue according to HIWU and HISA'S response.**

However, again, this. Case should be legally dropped. It is ripe for dismissal.

Sincerely,



William E. March
Licensed Thoroughbred Horse Trainer
Florida License #302380
2960 Sutherland Court
Palm Harbor, Florida 34684
(727) 365-5222
Billmarchtrainer@gmail.com
cjmarch1316@gmail.com

Cc: Carla March at home address

SEE page 4,5,6 for Cc's

Monica Pilarski
HIWU Legal Assistant
mpilarski@hiwu.org

Geneva Gnam
Litigation Counsel
Horseracing Integrity & Welfare Unit
ggnam@hiwu.org

Timothy Kruegar
Industrial Laboratories
tkruegar@industriallaboratories.net

Office of Florida Governor
Ron Desantis
Desantis.open.gov@eg.myflorida.com
The Capitol
400 S. Monroe Street
Tallahassee, Florida 32399

Michelle Pujals
HIWU General Counsel
c/o Geneva Gnam

Office of Attorney General
State of Florida
The Capital PL-01
Tallahassee, FL 32399-1050
Email: MyFloridaLegal.com

State of Florida

Dept. of Legal Affairs
Attn: ADA
Complaint Coordination
Capital PL-01
Tallahassee, FL. 32399-1056

Florida Division of Pari-Mutuel Wagering
Florida Gaming Control Commission
Executive Branch
Director Joe Dillmore
ATTN: Glenda Ricks
Chief Operating Officer
4070 Esplanade Way
Suite 250
TallaHASSEE, FL 32399
Email: joe.dillmore@flgaming.gov
Email: glenda.ricks@flgaming.gov
Email: Bradford.Jones@flgaming.gov
Chief Investigator
1400 West Commercial Blv d.
Suite 1656
Ft. Lauderdale, FL 33309-3787
(754) 288-1055

The Texas Thoroughbred Association
192 Cimarron Park Loop, Suite A
Buda, Texas 78610
(512). 458-6133
Fax (512) 453-5919
Email Executive Director: tracys@texasthorougbred.com
Horsemen's Benevolent & Protective Association
Dave Basler, Executive Director
Ohio Division

3860 Broadway
Grove City, Ohio 43123
(800)321-8367
Fax: (614) 875-0786
Email: ohio-hbpa@rrohio.com

TAB 26

Monica Pilarski

From: Monica Pilarski
Sent: Monday, April 27, 2026 9:56 AM
To: 'John Forgy'
Subject: RE: Scan from Staples

----- Forwarded message -----

From: John Forgy <johnforgy1@gmail.com>
Date: Fri, Apr 24, 2026 at 2:13 PM
Subject: Re: Scan from Staples
To: Geneva Gnam <ggnam@hiwu.org>
Cc: mpilarski@hiwu.com <mpilarski@hiwu.com>, William March <billmarchtrainer@gmail.com>, Carla March <cjmarch1316@gmail.com>

Mr. March,

As noted in Ms. Gnam's email to you below, neither HISA nor HIWU have been notified by the Federal Trade Commission (FTC) that you have properly appealed your case to the FTC for review by the FTC's

FEDERAL TRADE COMMISSION | OFFICE OF THE SECRETARY | FILED 05/18/2026 OSCAR NO. 615467 -PAGE Page 211 of 213 PUBLIC *
Office of Administrative Law Judges. In addition, your case does not appear on the following ~~FTC~~ website page, which lists all cases that have been appealed to the FTC from final civil sanctions imposed by HISA: <https://www.ftc.gov/enforcement/hisa/appeals-to-the-ftc>. These facts indicate that you have not properly appealed your case to the FTC in accordance with the appellate procedures that Ms. Gnam forwarded to you on March 25, 2026 (see Ms. Gnam's email to you in the email chain below).

With best regards,

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

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On Fri, Apr 24, 2026 at 8:17 AM Geneva Gnam <ggnam@hiwu.org> wrote:

Mr. March:

Mr. Forgy indicated that you called him asking for the status of your case. This matter was finalized in March. Neither HISA nor HIWU have been notified that you have properly appealed. Thus, this matter is concluded.

Geneva

Geneva N. Gnam, Esquire | Litigation Counsel
Horseracing Integrity & Welfare Unit
Drug Free Sport International
C: (816) 601-6897
E: ggnam@hiwu.org

From: Geneva Gnam <ggnam@hiwu.org>
Sent: Wednesday, March 25, 2026 3:03 PM
To: johnforgy1@gmail.com <johnforgy1@gmail.com>; mpilarski@hiwu.com <mpilarski@hiwu.com>; William March <billmarchtrainer@gmail.com>; Carla March <cjmarch1316@gmail.com>
Subject: Re: Scan from Staples

Mr. March:

Please find the link for appeal procedures for review of final civil sanctions imposed, which was previously provided to you on March 6, 2026 and March 16, 2026 (see attached). The appeal procedures are located in 16 Code of Federal Regulations Part I, Subpart T and can be found on the FTC website, available at this link: <https://www.ftc.gov/about-ftc/bureaus-offices/office-secretary/file-documents-adjudicative-proceedings>.

Geneva

Geneva N. Gnam, Esquire | Litigation Counsel
Horseracing Integrity & Welfare Unit
Drug Free Sport International
C: (816) 601-6897
E: ggnam@hiwu.org

From: Staples Print & Marketing Services <Ccreg10@staplesbusinesscenter.com>

Sent: Wednesday, March 25, 2026 2:25 PM

To: johnforgy1@gmail.com <johnforgy1@gmail.com>; mpilarski@hiwu.com <mpilarski@hiwu.com>; Geneva Gnam <ggnam@hiwu.org>; tkruegar@industriallaboratories.net <tkruegar@industriallaboratories.net>; joe.dillmore@flgaming.gov <joe.dillmore@flgaming.gov>

Subject: Scan from Staples

Please find the scanned documents from Staples attached to this email. -Staples Print and Marketing Services

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.

--

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

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--

John L. Forgy
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830 Vermillion Peak Pass
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