

**PUBLIC**

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

**ADMINISTRATIVE LAW JUDGE:**

**HON. JAY L. HIMES**

**IN THE MATTER OF:**

**CRAIG A. LEWIS**

**APPELLANT**

---

**THE AUTHORITY’S EXPLANATION OF BLOOD SAMPLE IDENTIFICATION  
NUMBERS**

---

Comes now the Horseracing Integrity and Safety Authority, Inc. (“**HISA**” or the “**Authority**”) pursuant to the Administrative Law Judge’s Order Directing Submission Regarding Blood Sample Identification Numbers, dated May 18, 2026, and submits the following Explanation of Blood Sample Identification Numbers.

**PUBLIC**

## **CERTIFICATE OF SERVICE**

Pursuant to Federal Trade Commission Rules of Practice 4.2(c) and 4.4(b), a copy of the Authority's Explanation of Blood Sample Identification Numbers is being served on May 20, 2026, via Administrative E-File System and by emailing a copy to the below listed. I further certify that no portion of the filing was drafted by generative artificial intelligence ("AI") and any language in the filing that was drafted by generative AI was checked for accuracy by human attorneys or paralegals using printed legal reporters or online legal databases.

Hon. Jay L. Himes  
Administrative Law Judge  
Office of Administrative Law  
Judges Federal Trade Commission  
600 Pennsylvania Ave. NW  
Washington DC 20580  
via e-mail to [Oalj@ftc.gov](mailto:Oalj@ftc.gov)

Lawrence Lewis  
6444 E. Spring Street, #303  
Long Beach, CA 90815  
Via email: [ldlewis.law@gmail.com](mailto:ldlewis.law@gmail.com)

Counsel for the Appellant

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

*/s/ Bryan Beauman*

Enforcement Counsel

**PUBLIC****THE AUTHORITY’S EXPLANATION OF BLOOD SAMPLE IDENTIFICATION NUMBERS**

In response to the Order of the Administrative Law Judge (“ALJ”) to (a) identify the sources from which Sample numbers B101315752 and B200035796 were each derived and (b) explain (i) which reference number correctly identifies the blood Sample from Kikuride that forms the basis for HIWU’s alleged Controlled Medication Substance violation, and (ii) the factual basis for that explanation, the Authority provides the following.

Blood Sample B200035796 was assigned to the Post-Race blood Sample collected from the Covered Horse Kikuride by HIWU Sample Collection Personnel after Race 11 on August 31, 2025 at Del Mar Racetrack in Del Mar, California. This is supported by the HIWU Sample Collection Form;<sup>1</sup> the September 19, 2025 email reporting an Adverse Finding from the Director of the Kenneth L. Maddy Equine Analytical Chemistry Laboratory (“UC Davis”);<sup>2</sup> UC Davis’s A Sample Certificate of Analysis<sup>3</sup> and Amended A Sample Certificate of Analysis;<sup>4</sup> UC Davis’ Laboratory Documentation Package;<sup>5</sup> the Equine Controlled Medication (“ECM”) Notice to Appellant, dated September 24, 2025;<sup>6</sup> the Equine Integrity Anti-Doping Sciences (“EQIAS”) Laboratory’s B Sample Certificate of Analysis;<sup>7</sup> the ECM Charge Letter to Appellant, dated November 3, 2025;<sup>8</sup> and Kikuride’s Sample Test Results.<sup>9</sup> For the avoidance of any doubt, blood

---

<sup>1</sup> AB, p. 150.

<sup>2</sup> AB, p. 226

<sup>3</sup> AB, p. 149.

<sup>4</sup> AB, p. 221.

<sup>5</sup> AB, pp. 167-221.

<sup>6</sup> AB, pp. 144, 146, 152.

<sup>7</sup> AB, p. 166.

<sup>8</sup> AB, p. 160-161

<sup>9</sup> AB, p. 228.

**PUBLIC**

Sample B200035796 forms the basis for HIWU's alleged Controlled Medication Rule Violation with respect to the substance Methocarbamol involving Trainer Lewis.

Blood Sample B101315752 was assigned to the Post-Race blood Sample collected from the Covered Horse Dynamiteanddiamonds by Sample Collection Personnel after Race 5 on February 1, 2025 at Aqueduct Racetrack in Jamaica, New York.<sup>10</sup> This is supported by the Internal Adjudication Panel's ("IAP") Final Ruling, dated July 23, 2025, which was disseminated after the Responsible Person Angel Sanchez-Pinero requested, and was heard before, the IAP.<sup>11</sup> In addition, the fact that Sample number B101315752 belongs to Dynamiteanddiamonds is supported by Sample Collection Form, mission code AQU-PR-02012025, dated February 1, 2025;<sup>12</sup> UC Davis' A Sample Certificate of Analysis (Blood Sample B101315752), dated February 20, 2025,<sup>13</sup> and Industrial Laboratories' B Sample Certificate of Analysis (Blood Sample B101315752), dated March 27, 2025<sup>14</sup> related to the Adverse Analytical Finding ("AAF") for the Controlled Medication Substance Phenylbutazone supporting Trainer Sanchez-Pinero's ADMC Program Rule 3312 Violation (which occurred on February 1, 2025 and was resolved on July 23, 2025). For the avoidance of any doubt, Blood Sample B101315752 does not form the basis for HIWU's alleged Controlled Medication Rule Violation involving Trainer Lewis.

Based on factually similar circumstances, as well as comparable defenses raised by the Responsible Person in both matters,<sup>15</sup> HIWU Litigation Counsel Christy Heath used a draft of

---

<sup>10</sup> Exhibit 1, *HIWU v. Angel Sanchez-Pinero (ECM2025-55)*, [IAP Final Ruling](#), at § 8 (Jul. 23, 2025).

<sup>11</sup> *Id.* at § 2 (wherein the IAP Member found "Trainer Sanchez-Pinero violated ADMC Program Rule 3312 for the presence of Phenylbutazone in Covered Horse 'Dynamitendiamond's Post-Race Sample #**B101315752** on 2/1/2025.") (emphasis added).

<sup>12</sup> Exhibit 2, Sample Collection Form (AQU-PR-02012025), dated Feb. 1, 2025.

<sup>13</sup> Exhibit 3, UC Davis A Sample Certificate of Analysis, dated Feb. 20, 2025.

<sup>14</sup> Exhibit 4, Industrial's B Sample Certificate of Analysis, dated Mar. 27, 2025.

<sup>15</sup> *See* Exhibit 1, *HIWU v. Angel Sanchez-Pinero (ECM2025-55)*. Both cases involved a Class C Controlled Medication Rule 3312 Violation wherein the Responsible Person alleged the Covered Horse's Veterinarian administered the Controlled Medication Substance to the Covered Horse 48 hours pre-Race. Both Responsible Persons argued 48-hour

**PUBLIC**

HIWU's Response Submission in Trainer Sanchez-Pinero's IAP case to craft HIWU's Response Submission in Trainer Lewis' IAP case. Despite taking special care to avoid doing so, Ms. Heath inadvertently failed to change Blood Sample B101315752 to Blood Sample B200035796. Subsequent documents filed on behalf of the Authority derived their pertinent facts from HIWU's Response Submission, creating the ensuing confusion and necessitating this clarification. For all the trouble her oversight created, Ms. Heath is profoundly sorry. Ms. Pujals also regrets failing to notice and correct the error.

ALL OF WHICH IS RESPECTFULLY SUBMITTED THIS 20<sup>th</sup> day of May, 2026.

/s/Bryan H. Beauman

BRYAN BEAUMAN  
REBECCA PRICE  
333 W. Vine Street, Suite 1500  
Lexington, Kentucky 40507  
Telephone: (859) 255-8581  
[bbeauman@sturgillturner.com](mailto:bbeauman@sturgillturner.com)  
[rprice@sturgillturner.com](mailto:rprice@sturgillturner.com)

**HISA ENFORCEMENT COUNSEL**

MICHELLE C. PUJALS  
CHRISTY HEATH  
4801 Main Street, Suite 350  
Kansas City, MO 64112  
Telephone: (816) 291-1864  
[mpujals@hiwu.org](mailto:mpujals@hiwu.org)  
[afarrell@hiwu.org](mailto:afarrell@hiwu.org)

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

---

pre-Race administrations were common practice and should not have resulted in AAFs. Both Responsible Persons failed to recognize the substantive difference between Detection Time and Withdrawal Guidance, and disclaimed that they bore strict liability for violations of the ADMC Program by their Covered Horse's Veterinarian.

# Exhibit

1

**BEFORE THE INTERNAL ADJUDICATION PANEL**

**HIWU**

**Case Number:** ECM2025-55  
**IAP Member** Ron Walker

v.

Angel Sanchez-Pinero

*[Insert Name of Covered Person]*

**FINAL RULING OF INTERNAL ADJUDICATION PANEL**

**Section One – Parties**

Date of Hearing: 7/10/25 (hearing waived, check here)

Date of Decision: 7/21/25

HIWU Counsel: Christy Heath

Covered Person: Angel Sanchez-Pinero

Counsel/Representative of Covered Person: Jeffrey Phillips

Any Third Parties: Jose Ventimilla, Interpreter for Trainer Angel Sanchez-Pinero

**Section Two - Charges**

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

Trainer Sanchez-Pinero violated ADMC Program Rule 3312 for the presence of Phenylbutazone in Covered Horse "Dynamitendiamonds"'s Post-Race Sample #B101315752 on 2/1/2025.

### Section Three – Burdens of Proof and Evidence

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

HIWU Counsel, Christy Heath, presented evidence that:

- 1) Trainer Angel Sanchez-Pinero was the Responsible Person for Covered Horse "Dynamitendiamonds" on Feb 1, 2025;
- 2) A Post-Race Sample was collected from the Covered Horse on Feb 1, 2025 by Sample Collection Personnel;
- 3) Kenneth L. Maddy Equine Analytical Chemistry Laboratory ("UC Davis") reported that the "A Sample" has an Adverse Analytical Finding for the presence of Phenylbutazone; and
- 4) Trainer Angel Sanchez-Pinero elected to send a "B Sample" and Industrial Lab confirmed the presence of Phenylbutazone in "Dynamitendiamonds"'s B Sample.

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

Trainer Angel Sanchez-Pinero did not testify.

Counsel/Representative of Covered Person, Jeffrey Phillips presented that:

1. No horses receive medications from grooms unless trainer authorized it, and no authorization was given.
2. Phenylbutazone was injected by Vet Dr. Nicole Logan, on 1/31/25 at 1:00 PM, according to guidelines.
3. Horse raced 2 days later on 2/1/25 at 2:45 PM.  
Note: HIWU does not offer withdrawal guidance whether or not 48 hours is enough time to prevent an ECM violation.
4. Counsel objected to HIWU having only hearsay evidence.  
Note: Rule 3312(b) Conditions of a ECM positive.
5. Counsel objected to minor clerical errors in some lab reports.  
Note: Rule 3122(d) in part: Departures from any other Standards shall not invalidate analytical results.

#### Section Four – Violations Determined

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

ADMC Program Rule 3312: Presence of a Controlled Medication Substance

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

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

N/A

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

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

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

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

N/A

**Section Seven – Aggravating Circumstances**

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

N/A

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

**Section Eight - Consequences**

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

- 1) Disqualification of the results of "Dynamitendiamonds" obtained in Race 5 at Aqueduct Racetrack in Jamaica, New York, on February 1, 2025, and forfeiture of all purses and other compensation, prizes, trophies, points, and rankings and repayment or surrender (as applicable) to the Race Organizer pursuant to ADMC Program Rule 3321;
- 2) A period of Ineligibility of 30 days for you, as the Responsible Person, ADMC Program Rule 3323;
- 3) A fine of \$2,500 USD, ADMC Program Rule 3323;
- 4) Public Disclosure pursuant to ADMC Program Rule 3620; and
- 5) Assignment of 1.5 penalty points pursuant to ADMC Program Rule 3328.

**Section Nine – Penalty Points**

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

The Covered Person has 3.0 prior penalty points, bringing his or her current total penalty points to 4.5.

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

*Ron Walker*

\_\_\_\_\_  
Signature of IAP Member

# Exhibit

2



# Sample Collection Form

PUBLIC

## Test Session

### Notification Information

02/01/2025 Notification Date (month/day/year)	2:52 <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) <b>Stephen Feduniak</b>	
NYRA - Aqueduct Location of Test (city/state)	AQU-PR-02012025 Mission Code	3:01 <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM Time of Arrival	Dynamitendiamonds 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. <b>Edson Vilca</b>			<input type="checkbox"/> Winner <input checked="" 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

Angel Sanchez-Pinero Responsible Person Name (Print)	Means of Validating Horse ID		Color of Horse	
	<input checked="" type="checkbox"/> Microchip <u>981020045085710</u>	<input type="checkbox"/> Tattoo/Brand _____	<input checked="" type="checkbox"/> B (bay)	<input type="checkbox"/> Gr/Ro (gray or roan)
	<input type="checkbox"/> Recorded Horse Markings	<input type="checkbox"/> Ch (chestnut)	<input type="checkbox"/> Pal (palomino)	
	<input type="checkbox"/> Photo Taken	<input type="checkbox"/> Dk B (dark bay/brown)	<input type="checkbox"/> Wh (white)	
Lasix <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		Sex of Horse <input checked="" type="checkbox"/> Filly <input type="checkbox"/> Mare <input type="checkbox"/> Colt <input type="checkbox"/> Stallion <input type="checkbox"/> Ridgling <input 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

B101315752 Sample Code	4 # of Tubes Sealed	<input checked="" type="checkbox"/> YES (≥ 30mL)	02/01/2025 Sample Sealed Date	3:37 Sample Sealed Time	Collected by (print & sign) <b>Lindsey Davis</b>
		<input type="checkbox"/> NO (< 30mL)			<input type="checkbox"/> AM <input checked="" type="checkbox"/> PM
<b>URINE</b>					
U101315752 Sample Code	2 # of Bottles Sealed	<input checked="" type="checkbox"/> YES (≥ 50mL)	02/01/2025 Sample Sealed Date	3:45 Sample Sealed Time	Collected by (print & sign) <b>Joel Cohen</b>
		<input type="checkbox"/> NO (< 50mL)			<input type="checkbox"/> AM <input checked="" type="checkbox"/> PM
<b>HAIR</b>					
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)

### 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.

<b>Edson Vilca</b> Nominated/Responsible Person – print name	 Nominated/Responsible Person – signature	Test Session Concluded Date: <u>02/01/2025</u> Time: <u>3:48</u> <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM
<b>Lindsey Davis</b> Collection Officer (DCO/BCO) – print name	 Collection Officer (DCO/BCO) – signature	

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

# Exhibit

# 3



# Kenneth L. Maddy Equine Analytical Chemistry Laboratory California Animal Health and Food Safety Laboratory System

PO Box 1770  
Davis, California 95617

Phone: (530) 752-8700  
Fax: (530) 752-6253

Feb 20, 2025

Client: HIWU

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

**Laboratory Number:** 250203-557287  
**Sample Number:** B101315752  
**Sample Status:** ADVERSE FINDING  
**Delivery Date:** Feb 04, 2025  
**Sample Date:** Feb 01, 2025  
**Completion Date:** Feb 20, 2025  
**Location Sampled:** NYRA - Aqueduct  
**Sample Type:** BLOOD  
**Age/Sex\*:** 3 / FILLY  
**Courier:** FedEx

Attention: Dr. Mary Scollay

Blood sample number B101315752 was found to contain Phenylbutazone.

Detection, identification and confirmation were performed utilizing liquid chromatography - mass spectrometry. Enzymatic Hydrolysis Utilized: No

This report was generated because the results indicate the sample was in violation of the permissible substances and concentrations allowed under HIWU guidelines.

Respectfully,  
Equine Analytical Chemistry Laboratory

Amended Report: This report supersedes all prior versions. The report has been updated to include the language regarding HIWU regulations that was not present in prior versions.

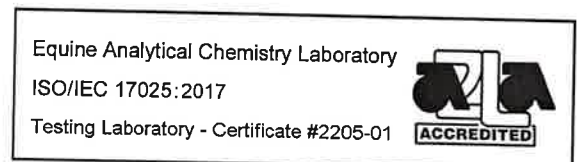
Printed on 2025-02-20 by BEN MOELLER, PhD, Associate Professor

These testing results only pertain to the sample that was tested and the specified analyte. I further certify that the confirmatory data supporting this report was reviewed for accuracy by two separate Certifying Reviewers / Certifying Scientists.

\* Information provided by the client. The laboratory is not responsible for inaccurate or incomplete information that may impact the validity of the results.

Submission of samples is considered a contracting service and this acknowledges and accepts the submission policies found at <https://cahfs.vetmed.ucdavis.edu/submitting/submission-forms>.

This report shall not be reproduced, except in full with prior written permission.



# Exhibit

4



**Industrial Laboratories**

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

**Report # Rpt-250327063**

Page 1 of 1

**FINAL POSITIVE REPORT**

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

Sample ID: <b>B101315752</b>	Sample Type: <b>Blood Only</b>
Collected At: <b>NYRA - Aqueduct</b>	Test Type: <b>Split Sample*</b>
Collection Date: <b>February 1, 2025</b>	Sex/Gender: <b>Filly*</b>
	Authorized Medication: <b>Lasix*</b>
Date Received: <b>March 11, 2025</b>	Seal Number: <b>N/A*</b>
Sample Condition: <b>Acceptable/Secure</b>	Laboratory ID: <b>250311032-001</b>

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:

Michael Oviatt  
 DTS Department Manager

Date: 3/27/2025

\* 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