

PUBLIC

**UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
MATTER NO.
IN THE MATTER OF:
JOSE CORRALES, APPELLANT**

CASE NO. JAMS EAD 1501001254

NOTICE OF APPEAL AND APPLICATION FOR REVIEW

1. Pursuant to 15 U.S.C. §3051 et seq., including §3058, 5 U.S.C. §556 et seq., and 16 CFR §1.145 et seq., including CFR §1.146, aggrieved Jose Corrales hereby appeals the Notice dated October 2, 2026, which found that Mr. Corrales violated ADMC Program Rule 3212 as a result of an Adverse Analytical Finding for Nikethamide and its metabolite, N-Ethylnicotinamide. A two (2) year period of ineligibility was imposed, a Ten Thousand Dollar (\$10,000.00) fine, disqualification of the horse and the associated purse and public disclosure.

2. Copies of the Decision on Appeal and Notice to Federal Trade Commission of Notice of Final Civil Sanction is attached.

3. HISA rules provide for review of Final Civil Sanctions by a Federal Administrative Law Judge pursuant to 15 U.S.C §3058.

4. Appellant challenges the Final Civil Sanction and requests de novo review under 15 U.S.C. § 3058(b)(1) - (3) and 16 C.F.R. §1.146(b) for multiple reasons:

DEFENSES TO THE VIOLATION CHARGED

The following defenses were raised in the arbitration and/or will be raised with respect to the charges:

A. The penalty assessed was arbitrary, capricious, an abuse of discretion, prejudicial, the result of a conflict of interest or otherwise not in accordance with law. It violates accepted standards established in the decisional law of the FEI and CSA as to how the punishment must follow and be commensurate with the violation. It is also unconstitutional as violative of the Seventh, Eighth and Fourteenth Amendments. The punishment in this case is unlawfully excessive. The Authority did not carry its burden of establishing that Appellant's alleged acts, practices, or omissions constituted a violation. The Authority did not prove Mr. Corrales did anything wrong.

B. The evidence fails to show that Curlene's Spirit tested positive for a prohibited substance. Though the race that the positive test result is alleged to have occurred took place on February 20, 2026, the Federal Express Shipping Label used for shipment of the sample indicates "Ship date" of January 13, 2026. This lapse in the chain of custody violates Rules 5510 and 5520.

C. Mr. Corrales intends to present evidence at the hearing that the cause of the positive test results came from the use of Vitamin B 3 supplement or plants of the Cordalis family. Mr. Corrales used a feed supplement known as Red Cell which among other things contained Niacin (Vitamin B3). There is also evidence that Appellant is asking to present at the appeal hearing that the alleged prohibited substances was found in race horses that had been provided a Vitamin B Supplement such as the one used by the Appellant. According to a University of Kentucky publication in 2025 "Trace level identifications of N'Ethylnicotinamide in racing horses associations with a Vitamin B3 Supplement: case reports and analysis". The article opines that N'Ethylnicotinamide "has been identified as a trace impurity in Vitamin B3 nicotinamide supplements administered to horses. Nikethamide has also been identified in certain Corydalis

plants, another potential source of trace amounts of Nikethamide and or N-Ethylnicotinamide in equines.

D. Mr. Corrales intends to present evidence at the hearing that the cause of the purported positive more than likely comes from contamination. Mr. Corrales' barn at Laurel Park has open access assessable to anyone on the grounds at Laurel Park.

E. While legal authority on the subject of the constitutionality of the application of HISA and HIWU is divided, in the most recent ruling on the subject, the Fifth Circuit Court of Appeals in National Horsemen's Benevolent and Protective Association, et al v. Jerry Black, et al, Case No. 23-10520 (5TH Circuit Court of Appeals) declared HISA in violation of the private nondelegation doctrine of the U.S. Constitution. The instant case should be dismissed or at a minimum be stayed until such time as this issue is finally decided before the United States Supreme Court.

F. The absolute insurer rule is an unconstitutional and improper rule in deterring illegal equine drugging. There is no evidence that the allegedly positive result did or could have had a performance enhancing effect. The science is flawed. The HISA rules deny Mr. Corrales his right to procedural and substantive due process. Jurisprudence based upon traditional principles of culpability and the exercise of due care are more appropriate than a rule of strict liability without fault.

G. The Authority's procedural rules unlawfully deny Mr. Corrales his Seventh Amendment right to a jury trial.

H. Mr. Corrales bears no fault or negligence as set forth in Rule 3224 and/or he bears no significant fault or negligence as forth in Rule 3225. Mr. Corrales did not administer nor provide Curlene's Spirit Nikethamide and/or its metabolite, N-Ethylnicotinamide. The list of what was provided to Curlene's Spirit and Mr. Corrales was provided at the arbitration hearing. The Authority came into Mr. Corrales' barn, searched and tested Mr. Corrales's feed and

supplements. No banned substances were found.

For all the above reasons, the Decision and sanctions should be reversed.

REQUEST FOR EVIDENTIARY HEARING

Pursuant to 16 CFR 1.146 Appellant requests an evidentiary hearing. Appellant requests a hearing to contest the Final Civil Sanction, to contest the facts, and to contest the interpretation of law that formed the basis for the imposition of the Sanctions and to contest the sanctions which were imposed. In particular the Appellant contends the Appellee did not meet its burden that the Appellant violated any relevant drug rule or drug regulation, that the imposition of the sanction was against the weight of the evidence and was arbitrary and capricious.

The Appellant intends to present evidence with respect to all of the issues referenced above.

REQUEST TO SUPPLEMENT THE RECORD

Pursuant to 16 CFR 1.146(c)(4) and 1.147 Appellant requests a hearing to supplement the factual record. Mr. Corrales requests permission to present evidence of the studies regarding vitamin B and the purported positive results of the banned substances in which he is charged. Mr. Corrales requests permission to provide expert testimony on the subject as well. Mr. Corrales requests permission to present expert testimony with respect to the reliability of the sample result(s) relied upon by the authority, additional chain of custody issues not addressed at the arbitration hearing and whether the alleged prohibited substance had any performance enhancing effects.

/s/ Richard J. Hackerman

Richard J. Hackerman
3635 Old Court Road, Suite 208
Baltimore, Maryland 21208
(410) 243-8800
Attorney for the Appellant
Client Prot. No.:8212010181
Richard@richardhackerman.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on October 7, 2026, a copy of the above was emailed to the following attorney:

Email: ggnam@hiwu.org
Geneva Gnam, Esquire
Litigation Counsel
Horseracing Integrity & Welfare Unit
4801 Main Street
Suite 350
Kansas City, MO. 64112-2749

John L. Forgy
Counsel to HISA
830 Vermillion Peak Pass
Lexington, KY 40515
Email: johnforgy1@gmail.com

/s/ Richard J. Hackerman

Richard J. Hackerman
3635 Old Court Road, Suite 208
Baltimore, Maryland 21208
(410) 243-8800
Attorney for the Appellant.
Client Prot. No.:8212010181
Richard@richardhackerman.com



NOTICE OF FINAL CIVIL SANCTIONS UNDER THE ADMC PROGRAM

October 2, 2026

SENT VIA EMAIL corralesracingllc@gmail.com

Jose Corrales
9606 Dixon St.
Laurel, MD 20723
(541) 410-6987

**Re: EAD2026-28/EAD Charge of Anti-Doping Rule Violation – Rule 3212/Presence of a Banned Substance
Covered Horse: Curlene's Spirit**

This serves as notice to you, Jose Corrales, 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 the enclosed Final Decision of the Arbitral Body and 15 U.S.C. 3057(d):

1. A period of Ineligibility for you of two (2) years, commencing on October 3, 2026, the effective date of your Provisional Suspension, and continuing through October 3, 2028, in accordance with ADMC Program Rule 3223;
2. A period of Ineligibility of sixty (60) days for the Covered Horse Curlene's Spirit, beginning on February 20, 2026, and subject to a negative Re-Entry Test, pursuant to ADMC Program Rule 3222 (which has already been served by the Covered Horse);
3. Disqualification of the results of Curlene's Spirit obtained in Race 5 at Laurel Park in Laurel, Maryland on February 20, 2026, and forfeiture of all purses and other compensation, prizes, trophies, points, and rankings and repayment or surrender (as applicable) to the Race Organizer (ADMC Program Rule 3221);
4. A fine of \$10,000 in accordance with ADMC Program Rule 3223; and
5. Public Disclosure in accordance with ADMC Program Rule 3620.

This matter involved the Presence of a Banned Substance and/or its Metabolites or Markers (ADMC Program Rule 3212) in a Post-Race/Vet's List Sample – Nikethamide. The Banned Substance was found to be present in a urine sample collected from Curlene's Spirit after Race 5 at Laurel Park in Laurel, Maryland on February 20, 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 financial penalties imposed must be paid in accordance with the Final Decision of the Arbitral Body.

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 'KR Kremers', is written over a horizontal line.

Kyle Kremers, HIWU Assistant General Counsel

Encls...: Final Decision of Arbitral Body
Payment Instructions for HISA Portal

cc (w/ encls.): Richard J. Hackerman, Counsel for Mr. Corrales
Charles Parker, Owner
Maryland Racing Commission
HISA

**BEFORE THE HORSERACING INTEGRITY AND SAFETY AUTHORITY'S
ANTIDOPING AND MEDICATION CONTROL PROGRAM ARBITRATION PANEL**

ADMINISTERED BY JAMS, CASE NO. 1501001254

In the Matter of the Arbitration Between:

HORSE RACING INTEGRITY WELFARE UNIT ("HIWU" or "Agency"),
Claimant

v.

MR. JOSE CORRALES ("Trainer"),
Respondent

FINAL DECISION

I, THE UNDERSIGNED ARBITRATOR, having been designated, and having been duly sworn, and having duly heard the allegations, arguments, submissions, proofs, and evidence submitted by the Parties, after a full evidentiary hearing occurring remotely on September 22, 2026, pursuant to the Horseracing Integrity and Safety Act of 2020 and its implementing regulations, do hereby FIND and DECIDE as follows:

I. INTRODUCTION

- 1.1 This case involves allegations of violation of ADMC Program Rule 3212 for the presence of a banned substance and/or its metabolites or markers. The substance in question is Nikethamide and its metabolite, N-Ethylnicotinamide.
- 1.2 HIWU is the United States government-recognized entity responsible for sample collection and results management in the anti-doping testing of thoroughbred racehorses in the United States, pursuant to the Horseracing Integrity Act of 2020, 15 U.S.C. secs. 3051- 3060. HIWU was represented in these proceedings by Geneva Gnam, Esq.

- 1.3 Mr. Jose Corrales (“Trainer Corrales”) is a longtime Trainer of Thoroughbred racehorses and is registered with the Horseracing Integrity and Safety Authority, Inc. (“HISA”). Trainer Corrales is a Responsible Person under Anti-Doping and Medication Control Program (“ADMC Program”) Rule 3030(a). Trainer Corrales was represented by Richard J. Hackerman, Esq.
- 1.4 Throughout this Final Award, HIWU and Trainer Corrales shall be referred to individually as “Party” and collectively as “Parties”.

II. THE FACTS

- 2.1 Below is a summary of the relevant facts and allegations based on the Parties’ written submissions, pleadings, and evidence adduced at the hearing. Additional facts and allegations found in the Parties’ written submissions, pleadings and evidence may be set out, where relevant, in connection with the legal discussion that follows. While the Arbitrator has considered all the facts, allegations, legal arguments and evidence submitted by the Parties in the present proceedings, the Arbitrator refers in this Final Award only to the submissions and evidence the Arbitrator considers necessary to explain his reasoning.
- 2.2 Where the parties disagree on the facts, the facts as found are based on the Arbitrator’s assessment of the evidence, including the credibility of the witness, together with reasonable inferences drawn therefrom.

III. PROCEDURAL HISTORY

- 3.1 On February 20, 2026, Curlene’s Spirit competed in Race 5 at Laurel Park in Laurel, Maryland and won.
- 3.2 Following the Race, Sample Collection Personnel collected a Post-Race urine Sample from Curlene’s Spirit, designated as Sample #U200067543 (the “Sample”). The Sample was submitted to Industrial Laboratories (“Industrial”) in Denver, Colorado for analysis. Industrial analyzed the A Sample of Sample #U200067543 only and stored the B Sample for possible later analysis. Industrial detected Nikethamide and its metabolite, N-Ethylnicotinamide in the A Sample and issued a Certificate of Analysis consistent with that finding.
- 3.3 Based upon the Adverse Analytical Finding (“AAF”) reported on Industrial’s A Sample COA, HIWU served Mr. Corrales, as Trainer for Curlene’s Spirit, with a Notice of Alleged ADRV (“Notice Letter”) on March 19, 2026. The Notice Letter contained both an invitation to provide a written explanation regarding the AAF

and to request analysis of Curlene's Spirit's B Sample. The deadline to provide a written explanation was March 26, 2026. Trainer Corrales did not provide a written explanation. The deadline to request B Sample analysis was March 24, 2026. On March 20, 2026, Trainer Corrales requested analysis of Curlene's Spirit's B Sample.

- 3.4 The Equine Integrity and Anti-Doping Sciences Laboratory ("EQIAS") in Lexington, Kentucky analyzed Curlene's Spirit's B Sample, confirmed that the B Sample contained Nikethamide and its metabolite, N-Ethylnicotinamide, and issued a Certificate of Analysis consistent with that finding.
- 3.5 On May 19, 2026, HIWU served Trainer Corrales with a Charge of ADRV ("Charge Letter"), pursuant to ADMC Program Rule 3212. The Charge Letter detailed Trainer Corrales' option to either admit the violation, accepting the consequences proposed by HIWU or to request a hearing before the Arbitral Body, providing a deadline for the request of 5:00 p.m. (CDT) on May 26, 2026. On May 22, 2026, Trainer Corrales, through counsel, requested a hearing before the Arbitral Body.
- 3.6 HIWU initiated a hearing before the Arbitral Body with JAMS on May 26, 2026. Professor Emeritus John T. Wendt was selected as the arbitrator.
- 3.7 Trainer Corrales filed a Motion to Stay Proceedings before Arbitrator Wendt ("Motion for Stay") on July 2, 2026, seeking, among other things, to stay this arbitration and to enjoin adjudication of the charge until the United States Supreme Court rules on the constitutionality of the HIWU/HISA laws.
- 3.8 HIWU filed its Response to the Motion for Stay ("Response to Stay") on July 17, 2026.
- 3.9 On July 22, 2026, Arbitrator Wendt issued Procedural Order No. 3, denying the Motion for Stay citing *HIWU v. Dominic Duree* "The ADMC Program sets out the rules that govern this proceeding and ground the jurisdiction of the Arbitrator over the Parties." *Duree* at 4.1 and "[T]he Arbitrator, as a creature of the ADMC Program, ha[s] no power to stay a proceeding made exclusive by Rule 7410(a) absent an order from a court of competent jurisdiction" *Duree* at 3.8. In this instance, there was no order from a court of competent jurisdiction. Accordingly, the Arbitrator had no power to stay the proceeding.
- 3.10 On August 25, 2026, Trainer Corrales filed his Prehearing Brief ("Respondent's Brief") along with a designation of witnesses, sworn statements and list of exhibits.

- 3.11 On September 8, 2026, HIWU filed its Reply Brief, together with the Agency's book of exhibits and the Agency's book of authorities.
- 3.12 On September 17, 2026, the parties, after conferring, proposed a hearing schedule of witnesses that was appreciated and approved by the Arbitrator.
- 3.13 A full Evidentiary Hearing was held on September 22, 2026, via Zoom. HIWU appeared by Ms. Gnam, and Mr. Corrales appeared by Mr. Hackerman. The hearing largely kept to the proposed schedule.
- 3.14 The Arbitrator received the sworn documentary record and heard the sworn testimony of Trainer Mr. Jose Corrales and Ms. Jovlyn Castro, who is married to Mr. Corrales and is the Foreman of the barn. They were the only witnesses to appear and testify. Both Mr. Corrales and Ms. Castro testified in a straightforward and sincere manner.
- 3.15 Both Mr. Corrales and Ms. Castro testified that for safety reasons their barn has "open access" and anyone could enter and depart freely. They have subsequently added cameras.
- 3.16 HIWU presented oral argument and, at the close of the hearing, confirmed that it had been afforded a full and fair opportunity to present its case and had no objection to the conduct of the hearing. Mr. Corrales and counsel, Mr. Hackerman, while still insisting on a full jury trial, presented oral argument and confirmed that they had been afforded a full and fair opportunity to present his case and had no objection to the conduct of the hearing.
- 3.17 Upon the completion of the evidence, the Hearing was closed and the Arbitrator advised those present that his Final Decision would be issued within the time frame required by the applicable rules.

IV. JURISDICTION

- 4.1 HIWU was created pursuant to the Horseracing Integrity and Safety Act of 2020, 15 U.S.C. secs. 3051-3060 ("Act"), and is charged with administering the rules and enforcement mechanisms of the Horseracing Integrity and Safety Authority's ("HISA") Anti-Doping and Medication Control Program ("ADMC Program"). The ADMC Program was created pursuant to the Act, approved by the Federal Trade Commission on March 27, 2023, and implemented on May 22, 2023. See 88 Fed. Reg. 5084-5201 (January 26, 2023). The ADMC Program sets out the applicable rules that govern this proceeding and ground the jurisdiction of the Panel over all participants. Rule 3020 provides that the anti-doping rules set out in

the ADMC Program apply to and are binding on violations by Covered Persons, and Covered Persons are defined under ADMC Program Rule 1020:

“(a) The Protocol applies to and is binding on: ...

(3) the following persons (each, a Covered Person): all Trainers, Owners, Breeders, Jockeys, Racetracks, Veterinarians, Persons licensed by a State Racing Commission, and the agents, assigns, and employees of such Persons; any other Persons required to be registered with the Authority; and any other horse support personnel who are engaged in the care, treatment, training, or racing of Covered Horses.”

- 4.2 Pursuant to section 3054 of the Act, “Covered Persons” must register with the Authority. However, they are bound by the Protocol by undertaking the activity (or activities) that make(s) them a Covered Person, whether or not they register with the Authority.
- 4.3 ADMC Program Rule 3030(a) further defines a “Responsible Person” to mean: “the Trainer of the Covered Horse.”
- 4.4 Mr. Corrales is a Trainer who is required to be and is registered with HISA. As such, he is both a “Responsible Person” and a Covered Person who is bound by and subject to the ADMC Program.
- 4.5 The Rule 7000 Series of the ADMC Program sets out the arbitration procedures governing a charged violation of the ADMC Program, providing as follows:

“Rule 7010. Applicability. The Arbitration Procedures set forth in this Rule 7000 Series shall apply to all adjudications arising out of the Rule 3000 Series. Rule 7020. Delegation of Duties (a) Subject to Rule 3249, Anti-Doping Rule Violations arising out of the Rule 3000 Series and violations of Rule 3229 (together, “EAD Violations”) shall be adjudicated by an independent arbitral body (the “Arbitral Body”) in accordance with the Rule 3000 Series and these Arbitration Procedures. The Arbitral Body may also adjudicate any other matter referred to it under the Protocol, and any other matter that might arise from time to time under the Protocol that the Agency considers should be determined by the Arbitral Body.”

- 4.6 Where HIWU issues a Charge Letter affecting charges on a Covered Person, arbitral proceedings are initiated pursuant to Rule 7060:

“Rule 7060. Initiation by the Agency

(a) EAD Violations. Unless Rule 3249 applies, if the Agency charges a Covered Person with an EAD Violation, the Agency shall initiate proceedings with the Arbitral Body. If a Covered Person is charged with both an EAD Violation and an ECM or Other Violation, the procedures for EAD Violations apply. The parties to the proceeding shall be the Agency and the Covered Person(s) charged. The Owner and the Authority shall be invited to join in the proceedings as observers and, if accepted as such, receive copies of the filings in the case. In the context of EAD Violation cases, the Owner may be permitted to intervene and make written or oral submissions.”

- 4.7 In this case, arbitration proceedings were commenced before JAMS, the designated arbitration provider. A preliminary hearing was conducted, the schedule was fixed by Procedural Orders, and the Arbitrator was appointed without objection from any Party.
- 4.8 While Mr. Corrales asks for the arbitrator to deny the relief that HIWU seeks, dismiss the charges, and/or stay all proceeding pending final resolution of the constitutional challenges, he does not dispute the jurisdiction. Nor did HIWU dispute jurisdiction. Both Parties fully participated in the proceedings without objection as to jurisdiction. As consent is the benchmark of arbitral jurisdiction, there is ample evidence of consent and no evidence of any objection.
- 4.9 Accordingly, the Arbitrator finds that jurisdiction is proper here.
- 4.10 *The reserved objection concerning a jury trial.* Mr. Corrales, while not contesting the Arbitrator’s jurisdiction, has reserved an objection asserting a right to trial by jury and objecting to any decision that would impair that right. The Arbitrator notes the objection and addresses it briefly. The jurisdiction exercised here derives from the Act and from the Rule 7000 Series of the ADMC Program; arbitration of these violations is mandatory and binding; and Mr. Corrales himself invoked the arbitral process when he requested a hearing. Whether the statutory arbitration scheme is consistent with the Seventh Amendment, or with any other constitutional guarantee, is a question for the courts and for the statutory review process, not for the Arbitrator, who is a creature of the Program and has no power to disapply the statutory framework or to rule on its constitutionality. An award of this kind is subject to review, on the application of a person aggrieved, by an Administrative Law Judge of the Federal Trade Commission and thereafter by the Commission, and ultimately to such judicial review as the law allows. See 15 U.S.C. § 3058. That is the proper forum for the challenge Mr. Corrales reserves. The Arbitrator therefore proceeded under the governing Rules, expressly reserving any rights Mr. Corrales may have to pursue that challenge elsewhere.

V. RELEVANT LEGAL STANDARDS

5.1 Rule 3212 of the ADMC Program recognizes “Presence” of a Prohibited Substance as an offense, providing in pertinent part as follows:

“(a) It is the personal and nondelegable duty of the Responsible Person to ensure that no Banned Substance is present in the body of his or her Covered Horse(s). The Responsible Person is therefore strictly liable for any Banned Substance or its Metabolites or Markers found to be present in a Sample collected from his or her Covered Horse(s). Accordingly, it is not necessary to demonstrate intent, Fault, negligence, or knowing Use on the part of the Responsible Person in order to establish that the Responsible Person has committed a Rule 3212 Anti-Doping Rule Violation.

(b) Sufficient proof of a Rule 3212 Anti-Doping Rule Violation is established by any of the following:

(1) the presence of a Banned Substance or its Metabolites or Markers in the Covered Horse’s A Sample where the Responsible Person waives analysis of the B Sample and the B Sample is not analyzed;

(2) the Covered Horse’s B Sample is analyzed and the analysis of the B Sample confirms the presence of the Banned Substance or its Metabolites or Markers found in the A Sample; or

(3) where, in exceptional circumstances, the Laboratory (on instruction from the Agency) further splits the A or B Sample into two parts in accordance with the Laboratory Standards, the analysis of the second part of the resulting split Sample confirms the presence of the same Banned Substance or its Metabolites or Markers as were found in the first part of the split Sample, or the Responsible Person waives analysis of the second part of the split Sample.

(c) The general rule is that the presence of any amount of a Banned Substance or its Metabolites or Markers in a Sample collected from a Covered Horse constitutes an AntiDoping Rule Violation by the Responsible Person of that Covered Horse.

(d) As an exception to the general rule of Rule 3212(c), the Prohibited List, Standards, or Technical Documents may establish special criteria for the reporting or the evaluation of certain Banned Substances, including a Minimum Reporting Level, Screening Limit, Threshold, or Decision Limit.”

- 5.2 Mr. Corrales, as the Trainer of Curlene's Spirit, is a Responsible Person under Rule 3030(a) of the ADMC Program, and he does not dispute that status. As a Responsible Person, Rule 3030(a) makes clear that, "The Responsible Person shall be personally liable for his or her Covered Horse(s) as set out under the Protocol." As a Responsible Person, Mr. Corrales is also a Covered Person. Rule 3040(a) also makes clear, in pertinent part, that:

"It is the personal responsibility of each Covered Person: (1) to be knowledgeable of and to comply with the Protocol and related rules at all times. All Covered Persons shall be bound by the Protocol and related rules, and any revisions thereto, from the date they go into effect, without further formality. It is the responsibility of all Covered Persons to familiarize themselves with the most up-to-date version of the Protocol and related rules and all revisions thereto; . . ."

- 5.3 Pursuant to Rule 3121, the burden of proof is on HIWU to establish that a violation of the ADMC Program has occurred to the comfortable satisfaction of the Panel. "This standard of proof is higher than a balance of probabilities but lower than clear and convincing evidence or proof beyond a reasonable doubt." Rule 3121.

- 5.4 The World Anti-Doping Code ("WADC") provides the framework for a harmonious international anti-doping system and is widely used in international sports and expressly acknowledged as the basis for the ADMC Program. Rule 3070 provides in pertinent part that:

"(b) Subject to Rule 3070(d), the Protocol shall be interpreted as an independent and autonomous text and not by reference to existing law or statutes..."

(d) The World Anti-Doping Code and related International Standards, procedures, documents, and practices (WADA Code Program), the comments annotating provisions of the WADA Code Program, and any case law interpreting or applying any provisions, comments, or other aspects of the WADA Code Program, may be considered when adjudicating cases relating to the Protocol, where appropriate."

- 5.5 The definition of the offense of Presence in the ADMC Program is substantively identical to the definition of possession in the WADC (see Article 2).

- 5.6 ADMC Program Rule 3040 sets out certain obligations of a trainer such as Mr. Corrales, as a Responsible Person, in pertinent part as follows:

"Rule 3040. Core Responsibilities of Covered Persons (a) Responsibilities of All Covered Persons It is the personal responsibility of each Covered Person:

(a) Responsibilities of All Covered Persons

It is the personal responsibility of each Covered Person:

(1) to be knowledgeable of and to comply with the Protocol and related rules at all times. All Covered Persons shall be bound by the Protocol and related rules, and any revisions thereto, from the date they go into effect, without further formality. It is the responsibility of all Covered Persons to familiarize themselves with the most up-to-date version of the Protocol and related rules and all revisions thereto;

. . .

(b) Additional Responsibilities of Responsible Persons In addition to the duties under Rule 3040(a), it is the personal responsibility of each Responsible Person:...

(b) Additional Responsibilities of Responsible Persons

In addition to the duties under Rule 3040(a), it is the personal responsibility of each Responsible Person: . . .

(4) to inform all Covered Persons (including Veterinarians), employees, personnel, agents, and other Persons involved in any way with the care, treatment, training, or racing of his or her Covered Horses of their respective obligations under the Protocol (including, in particular, those specified in Rule 3040(a));

(5) to adequately supervise all Covered Persons (including Veterinarians), employees, personnel, agents, and other Persons involved in any way with the care, treatment, training, or racing of his or her Covered Horses, including by (without limitation):

(i) conducting appropriate due diligence in the hiring process before engaging their services;

(ii) clearly communicating to such Persons that compliance with the Protocol is a condition of employment or continuing engagement in the care, treatment, training, or racing of his or her Covered Horses;

(iii) creating and maintaining systems to ensure that those Persons comply with the Protocol; and

(iv) adequately monitoring and overseeing the services provided by those Persons in relation to the care, treatment, training, or racing of his or her Covered Horses;

(6) to bear strict liability for any violations of the Protocol by such Covered Persons (including Veterinarians), employees, personnel, agents, and other Persons involved in the care, treatment, or racing of his or her Covered Horses; ... ”

5.7 Pursuant to ADMC Program Rule 3223, the ineligibility, and financial penalties for a first anti-doping rule Violation of Rule 3214(a) (Presence) are:

- a. Two (2) years of Ineligibility, and
- b. A “Fine up to \$25,000 . . . and Payment of some or all of the adjudication costs and [HIWU]’s legal costs.”

5.8 Where a Violation of the ADMC Program is established, the Respondent may be entitled to a mitigation of the applicable Consequences, only where he establishes on a balance of probabilities, that he acted with either No Fault or Negligence, or No Significant Fault or Negligence. Fault is defined in the ADMC Program as:

“any breach of duty or any lack of care appropriate to a particular situation. Factors to be taken into consideration in assessing a Covered Person’s degree of Fault include (but are not limited to) the Covered Person’s experience and special considerations such as impairment, the degree of risk that should have been perceived by the Covered Person, and the level of care and investigation exercised by the Covered Person in relation to what should have been the perceived level of risk. With respect to supervision, factors to be taken into consideration are the degree to which the Covered Person conducted appropriate due diligence, educated, supervised, and monitored Covered Persons (including Veterinarians), employees, personnel, agents, and other Persons involved in any way with the care, treatment, training, or racing of his or her Covered Horses, and created and maintained systems to ensure compliance with the Protocol. In assessing the Covered Person’s degree of Fault, the circumstances considered must be specific and relevant to explain the Covered Person’s departure from the expected standard of behavior. Thus, for example, the fact that the Covered Person would lose the opportunity to earn large sums of money during a period of Ineligibility, or the fact that the Covered Person or Covered Horse only has a short time left in a career, or the timing of the horseracing calendar, would not be relevant factors to be considered in reducing the period of Ineligibility based on degree of Fault.”

5.9 ADMC Program Rule 3224 permits the reduction of sanctions where there is No Fault or Negligence, as follows:

“Rule 3224. Elimination of the Period of Ineligibility Where There Is No Fault or Negligence

(a) If a Covered Person establishes in an individual case that he or she bears No Fault or Negligence for the Anti-Doping Rule Violation(s) charged, the otherwise applicable period of Ineligibility and other Consequences for such Covered Person shall be eliminated (except for those set out in Rule 3221(a) and Rule 3620)...

(b) Rule 3224 only applies in exceptional circumstances... ”

5.10 No Fault or Negligence is defined by the ADMC Program as:

*“the Covered Person establishing that he or she did not know or suspect, and could not reasonably have known or suspected, even with the exercise of utmost caution, that he or she had administered to the Covered Horse (or that the Covered Horse’s system otherwise contained) a Banned Substance or a Controlled Medication Substance, or that he or she had Used on the Covered Horse a Banned Method or a Controlled Medication Method, or otherwise committed an Anti-Doping Rule Violation or Controlled Medication Rule Violation. For any violation of Rule 3212 or Rule 3312, **the Covered Person must also establish how the Prohibited Substance entered the Covered Horse’s system in order to establish No Fault or Negligence.**” (emphasis added).*

5.11 ADMC Program Rule 3225 also allows for the reduction of sanctions where there is No Significant Fault or Negligence, as follows:

“Rule 3225. Reduction of the Period of Ineligibility Where There Is No Significant Fault or Negligence

Reductions under this Rule 3225 are mutually exclusive and not cumulative, i.e., no more than one of them may be applied in a particular case.

(a) General rule. Where the Covered Person establishes that he or she bears No Significant Fault or Negligence for the Anti-Doping Rule Violation in question, then... the period of Ineligibility shall be fixed between 3 months and 2 years, depending on the Covered Person’s degree of Fault.”

5.12 No Significant Fault or Negligence is defined in the ADMC Program as:

*“the Covered Person establishing that his or her fault or negligence, when viewed in the totality of the circumstances and taking into account the criteria for No Fault or Negligence, was not significant in relationship to the Anti-Doping Rule Violation or Controlled Medication Rule Violation in question. For any violation of Rule 3212 or 3312, **the Covered Person must also establish how the Prohibited***

Substance entered the Covered Horse's system in order to establish No Significant Fault or Negligence." (emphasis added).

VI. THE PARTIES' CONTENTIONS AND PRAYERS FOR RELIEF

6.1 The Parties asserted various arguments in their pre-hearing briefs and at the hearing. Their fundamental positions are summarized below. To the extent necessary, the Arbitrator will address various arguments that were made in the Analysis section below.

HIWU'S Contentions

6.2 HIWU's position may be summarized as follows:

- (a) Trainer Corrales is charged with one Equine Anti-Doping Rule Violation ("ADRV") of ADMC Program Rule 3212 for the Presence of the Banned Substance Nikethamide and its metabolite, N-EthylNicotinamide in a Post-Race urine Sample collected from the Covered Horse Curlene's Spirit, following Race 5 at Laurel Park in Laurel, Maryland on February 20, 2026 ("Curlene's Spirit's Race").
- (b) Nikethamide, a stimulant, and its metabolite N-EthylNicotinamide are category S0 Banned Substances on the Prohibited List and Technical Document – Prohibited Substances ("Prohibited List"). Nikethamide's inclusion on the Prohibited List as a category S0 Banned Substance means that it is "prohibited at all times...on the basis of the Agency's determination that medical, veterinary, and/or other scientific evidence or experience supports [the] actual or potential (i) ability to enhance the performance of Covered Horses, (ii) masking properties, and/or (iii) detrimental impact on horse welfare."
- (c) The Agency Pre-Hearing Brief, along with the Agency's Book of Exhibits ("ABE") and Book of Authorities ("ABA"), were filed in support of HIWU's Charge of a Presence ADRV by Trainer Corrales in violation of ADMC Program Rule 3212.
- (d) HIWU will establish to a comfortable satisfaction of the Arbitral Body that Trainer Corrales committed the asserted Presence ADRV.
- (e) Once HIWU establishes the ADRV, the burden then shifts to Trainer Corrales to rebut the ADRV or to attempt to mitigate the Consequences that flow from the ADRV by establishing on a balance of probabilities that he acted with either No Fault or Negligence or No Significant Fault or Negligence. Both

legal standards are high. Trainer Corrales has not, and cannot, meet either standard.

- (f) In accordance with the Protocol, HIWU seeks the imposition of the following default Consequences for Trainer Corrales for the ADRV, which is his first ADRV:
1. A period of Ineligibility of two (2) years for Trainer Corrales, pursuant to ADMC Program Rules 3223, to be served consecutively to any Consequences imposed on other matters, pursuant to ADMC Program Rule 3223(c)(2);
 2. A period of Ineligibility of sixty (60) days for Covered Horse Curlene's Spirit beginning on February 20, 2026, pursuant to ADMC Program Rule 3222, subject to a Negative Re-Entry Test;
 3. A fine of \$25,000 for Trainer Corrales, pursuant to ADMC Program Rule 3223;
 4. The automatic Disqualification of the results of Curlene's Spirit obtained in Race 5 at Laurel Park in Laurel, Maryland on February 20, 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 3221;
 5. Payment of some or all of the adjudication costs, pursuant to ADMC Program Rule 3223; and
 6. The automatic Public Disclosure of the violation pursuant to ADMC Program Rule 3231 and in accordance with ADMC Program Rule 3620.

Trainer Corrales' Contentions

6.3 The Respondent's position may be summarized as follows:

- (a) Jose Corrales was notified of an EAD charge of Anti-Doping Rules pertaining to his horse, Curlene's Spirit in association with Race 5 at Laurel Park on February 20, 2026. A sample (U200067543) was provided of the covered horse and allegedly resulted in the Adverse Analytical Finding for Nikethamide and its metabolite, N-Ethylnicotinamide.

- (b) Mr. Corrales is facing a potential 2-year suspension, a \$25,000.00 (Twenty-Five Thousand Dollars Fine) and payment of all or a portion of HIWU’S legal fees.
- (c) Mr. Corrales denies the allegations that he violated ADMC Program Rule 3212.
- (d) Mr. Corrales did not administer Nikethamide and its metabolite, N-Ethylnicotinamide. Mr. Corrales did not ask or witness anyone else to administer Nikethamide and its metabolite, N-Ethylnicotinamide.
- (e) The barn where his horses are stables is “open access” for safety reasons and is accessible to anyone on the grounds at Laurel Park.
- (f) The banned substance therefore had to have come from a contaminated product, or other form of contamination from a third party.
- (g) The Authority came into Mr. Corrales’ barn, searched and tested Mr. Corrales’s feed and supplements. No banned substances were found.
- (h) Mr. Corrales did everything reasonably possible to prevent a banned substance from appearing in a sample provided by one of his horses.
- (i) The following defenses were raised with respect to the charges:
 - 1. The case may not move forward before JAMS as Mr. Corrales has a right to and has requested a jury trial.
 - 2. HISA/HIWU laws are violative of the private non-delegation doctrine.
 - 3. The HIWU/HISA laws are unconstitutional as they do not afford substantive due process.
 - 4. The Chain of Custody of the samples “makes no sense”.
 - 5. The Respondent bears no fault or negligence and pursuant to Rule 3224, Mr. Corrales should receive no penalty.
 - 6. The Respondent bears no significant fault or negligence and at maximum pursuant to Rule 3225, Mr. Corrales should receive a reprimand and no period of ineligibility.

7. Respondent requests this body deny the relief the Authority seeks, dismiss the charges against the Respondent and/or stay all proceedings and adjudicative activity pending final resolution of the constitutional challenges to HISA/HIWU's enforcement structure by the federal appellate courts and, if review is granted, the United States Supreme Court.

VII. ANALYSIS

- 7.1 While all evidence and legal authorities submitted were considered by the Arbitrator, this section necessarily refers only to the evidence and law that the Arbitrator relied upon in reaching this Final Decision.

Presence

- 7.2 The Respondent is alleged to have breached ADMC Program Rule 3212(a), under which the presence of a Prohibited Substance in a Covered Horse is a strict liability offense for which the "intent, Fault, negligence, or knowing Use on the part of the Responsible Person" is not required to establish a violation:

*"(a) It is the personal and non-delegable duty of the Responsible Person to ensure that no Banned Substance is present in the body of his or her Covered Horse(s). The Responsible Person is therefore **strictly liable for any Banned Substance or its Metabolites or Markers found to be present in a Sample collected from his or her Covered Horse(s).** Accordingly, **it is not necessary to demonstrate intent, Fault, negligence, or knowing Use on the part of the Responsible Person in order to establish that the Responsible Person has committed a Rule 3212 Anti-Doping Rule Violation.**"(emphasis added).*

- 7.3 HIWU has the burden of establishing a Presence Based violation to the "comfortable satisfaction" of the Arbitrator. Under Rule 3212(b), sufficient proof of a Rule 3212 violation is established when "the Covered Horse's B Sample is analyzed and the analysis of the B Sample confirms the presence of the Banned Substance or its Metabolites or Markers found in the A Sample". As set out above, the B Sample Analysis confirmed the A Sample Analysis and Mr. Corrales' violation is established under Rule 3212(b)(2).
- 7.4 Mr. Corrales argued that "the shipping label and the remaining chain of custody information can not be reconciled." Specifically, Mr. Corrales argued that the date on the shipping label shows a date before the race and sample collection in question. HIWU argued that a pre-printed label was used and that the label date has no effect on the collection and custody or caused the AAF.

- 7.5 The un rebutted evidence shows that Curlene's Spirit's Race began at 2:00 p.m. and was won by Curlene's Spirit, a Dark Bay/Brown Filly. The Sample Collection Form indicates that Curlene's Spirit arrived in the test barn at 2:12 p.m. and the urine Sample was sealed at 2:39 p.m. The Sample Collection Form verified the identity of the Covered Horse in a number of ways, notably: (1) the Covered Horse's Name (in this instance, Curlene's Spirit); (2) the Covered Horse's unique microchip number (981020051768427); (3) the color of the Covered Horse (in this instance, dark bay/brown; (4) the sex of the Covered horse (in this instance, filly). The Sample Collection Form further identifies that Curlene's Spirit was selected for Post-Race Testing as the Winner of the Race and Trainer Corrales is correctly identified as Curlene's Spirit's Responsible Person. The Sample Collection Documentation was signed by the Nominated Person, confirming that the documentation accurately reflects the details of the Sample Collection Session. The Sample Collection Form identifiers for Curlene's Spirit matched the information recorded on both Equibase and on Curlene's Spirit's Microchip Number Lookup with The Jockey Club Registry.
- 7.6 The Sample Collection Form assigns the Sample a specific number, in this case Sample #U200067543. The Chain of Custody clearly establishes the Fed Ex tracking number for the Sample from Laurel Park to Industrial. Industrial noted receipt of the same Fed Ex tracking number and also documented that the cooler was "received in good and secure condition." EQIAS' Chain of Custody further documents that Sample #U200067543 arrived "intact with no evidence of tampering."
- 7.7 There is no doubt that the Sample belongs to Curlene's Spirit.
- 7.8 Pursuant to Rule 3122(d), departures from any Standards or provisions of the ADMC program are presumed to not invalidate an AAF:
- "(d) Departures from any other Standards or any provisions of the Protocol shall not invalidate analytical results or other evidence of a violation, and shall not constitute a defense to a charge of such violation; provided, however, that if the Covered Person establishes that a departure from any other Standards or any provisions of the Protocol could reasonably have caused the Adverse Analytical Finding or other factual basis for the violation charged, the Agency shall have the burden to establish that such departure did not cause the Adverse Analytical Finding or other factual basis for the violation."* (emphasis added).
- 7.9 While there may be an issue with the shipping label, Trainer Corrales has no evidence to establish that even if there was such a departure that on the balance of probabilities that departure could reasonably have caused the AAF. This must be

done with proper evidence and not mere speculation or denial. The AAF was caused by the presence of Nikethamide and its metabolite, N-Ethylnicotinamide being detected in both the A and B Samples, and there is no theory advanced (or that can reasonably be contemplated on the evidence) that would tie any alleged sample collection or storage errors to that positive finding.

- 7.10 Accordingly, for these reasons, the ADRV against Mr. Corrales is affirmed.
- 7.11 Nikethamide and its metabolite N-Ethylnicotinamide are a S0 category Prohibited Substance. Pursuant to ADMC Program Rule 3223, the presumptive ineligibility for a first ADRV under ADMC Program Rule 3212 (Presence) is two (2) years of Ineligibility.

Mitigation of Mr. Corrales' Sanction Based on Fault

- 7.12 Where a Violation of the ADMC Program is established, the Respondent may be entitled to a mitigation of the applicable consequences, only where they establish on a balance of probabilities that they acted with either No Fault or Negligence, or No Significant Fault or Negligence. As explained below, in both cases, as a threshold issue before considering the degree of fault in a particular case, the Covered Person must “establish how the Prohibited Substance entered the Covered Horse’s system”, which is also known as the requirement to prove the source of the AAF.
- 7.13 Trainer Corrales’ case relies on his own denial that he or anyone working with him administered Nikethamide and/or its metabolite, N-Ethylnicotinamide; the possibility of contamination; and the possibility of sabotage by persons unknown. Trainer Corrales has also argued that it would not make sense for someone in his position to be involved in administering Nikethamide and/or its metabolite, N-Ethylnicotinamide before a race with such a small monetary stake.
- 7.14 To succeed on such a defense for reduction of his penalty on these bases, it is well-accepted that the Respondent must show the source of the prohibited substance and there has been no showing here. As ALJ Himes stated *In the Matter of Philip Serpe*, ... “speculation is not proof.” Mr. Corrales has advanced the theory of “I didn’t do it” not that the substance came to be in the horse’s Sample through some known or likely route. The Arbitrator concludes that Trainer Corrales has failed to meet his burden of proving source by a balance of probabilities.
- 7.15 While Trainer Corrales may disagree with the ADMC Program’s imposition of a 2-year sanction absent evidence of intentional administration, the Rules are clear that Rule 3212 is a strict liability offense and requires no evidence of intent.

Where, as here, the source has not been established by a balance of probabilities, the ADMC Program requires the imposition of a two (2) year period of Ineligibility.

- 7.16 Accordingly, the Arbitrator has no choice but to find that Mr. Corrales should suffer a period of Ineligibility of two years.

Punishment-Fine, Payment Toward Legal Fees and Arbitration Costs

- 7.17 Under the ADMC Program, the punishment includes, in addition to a period of Ineligibility, a, “*Fine up to \$25,000 . . . and Payment of some or all of the adjudication costs and [HIWU]’s legal costs*”. Rule 3223(b). These consequences appear to be mandatory in their application; in other words, upon finding a violation, the Arbitrator must also make a finding on the applicable fine and the payment of the adjudication costs and HIWU’s legal costs.
- 7.18 From reading Rule 3223(b), it is clear that the use of “and” after the statement of the period of Ineligibility is conjunctive, and requires the Arbitrator to issue a fine of some amount “up to \$25,000”. The amount of this fine, however, appears to be entirely discretionary with the Arbitrator though some amount of fine appears to be mandatory.
- 7.19 The Arbitrator determines based on the specific facts and circumstances of this case, the substantial consequences imposed on Mr. Corrales, as well as the purpose of the regulatory scheme as applied here, the fine should be set at \$10,000, to be paid by the end of the period of Ineligibility. This is an imprecise calculation but one that the Arbitrator determines to be appropriate under the circumstances. The Arbitrator acknowledges that the determination of the amount of the fines imposed on Mr. Corrales based solely upon the facts in this case, and in other circumstances the determination would likely differ.
- 7.20 As to costs, HIWU seeks payment of some or all of the adjudication costs and its legal costs. While the conjunctive language of Rule 3223 suggests that some assessment of costs is mandatory, the amount of any contribution, like the fine, appears to be purely discretionary with the Arbitrator. Mr. Corrales litigated in good faith, the points he raised were neither frivolous nor unreasonable, and arose in a relatively new and perhaps not yet fully settled area of regulation. In those circumstances, the Arbitrator declines to award HIWU its legal costs and determines that each Party shall bear its own share of the arbitration costs of this proceeding.

- 7.21 As part of its claims for relief, HIWU seeks an order for public disclosure of the violation under Rule 3231 (and Rule 3620, to which Rule 3231 refers). The Arbitrator has reviewed those Rules. They appear to be mandatory and to set out the conditions and processes under which publication does or does not occur. In any event, there is no action the Arbitrator can take to cause publication to occur; the Arbitrator does not control HIWU's website or any other website on which publication might occur, any publication would occur after the Arbitrator is *functus officio*, and the Rules cited govern those matters independently of any view of the Arbitrator. Accordingly, the Arbitrator denies this request for relief as being beyond the power of the Arbitrator to grant. HIWU is to be guided by the relevant Rules of the ADMC Program in addressing publication of this decision.

VIII. AWARD

- 8.1 On the basis of the foregoing facts, legal analysis, and conclusions of fact, the Arbitrator renders the following decision:
- a. Mr. Corrales is found to have committed his first anti-doping rule violation of Presence. As a result, Mr. Corrales shall:
 1. Be suspended for a period of Ineligibility of two (2) years, commencing on the date of this Final Decision, with credit for any period of provisional suspension or Ineligibility already served in connection with this matter; and
 2. Be fined \$10,000, to be paid to HIWU by the end of the period of Ineligibility.
 - b. A period of Ineligibility of sixty (60) days for Covered Horse Curlene's Spirit beginning on February 20, 2026, pursuant to ADMC Program Rule 3222, subject to a Negative Re-Entry Test (This has already occurred and a Negative Re-Entry Test has been completed).
 - c. The automatic Disqualification of the results of Curlene's Spirit obtained in Race 5 at Laurel Park in Laurel, Maryland on February 20, 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 3221;
 - d. HIWU's request for an award of its legal costs is denied. In addition, each Party shall bear its own share of the arbitration costs.

- e. HIWU's request for an order of public disclosure is denied for the reasons stated, without prejudice to HIWU following its applicable rules on publication.
- f. This Final Decision shall be in full and final resolution of all claims and counterclaims submitted to this arbitration. All claims not expressly granted herein are hereby denied.

IT IS SO ORDERED, AWARDED, AND DECIDED.

Dated: September 30, 2026

A handwritten signature in dark ink, appearing to read "John T. Wendt", written over a horizontal line.

John T. Wendt, Arbitrator



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 Profile” and “My Information” scroll over to Payments section for outstanding fines owing
- Click on “Pay Now” to begin payment
- Credit Card, ACH Bank Debit 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 E Main Street, 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.