

**BEFORE THE MINNESOTA
BOARD OF VETERINARY MEDICINE
COMPLAINT REVIEW COMMITTEE**

In the Matter of
William K. Frahm-Gilles, DVM
License No. 11118

**AGREEMENT FOR
CORRECTIVE ACTION**

This Agreement is entered into by and between William K. Frahm-Gilles, DVM (“Licensee”), and the Minnesota Board of Veterinary Medicine Complaint Review Committee (“Complaint Review Committee”) based on Minnesota Statutes section 214.103, subdivision 6(a)(2). Licensee and the Complaint Review Committee agree to the following:

BACKGROUND

1. On February 28, 2018, the Board granted Licensee a license to practice veterinary medicine in Minnesota.
2. On December 27, 2024, Licensee met with the Complaint Review Committee, composed of Julie Dahlke, DVM, Board member, and Raye Taylor, DVM, Board member, to discuss allegations regarding Licensee's practice of veterinary medicine contained in a Notice of Conference dated November 27, 2024. Theresa Flahaven, Assistant Attorney General, represented the Complaint Review Committee at the conference. The Complaint Review Committee advised Licensee that he may choose to be represented by legal counsel in this matter. Licensee chose not to be represented by counsel at the conference. Licensee subsequently engaged David M. Aafedt of the law firm of Winthrop & Weinstine, P.A. to represent him in conjunction with this matter. Licensee and the Complaint Review Committee have agreed to enter into an Agreement for Corrective Action to address the concerns identified below.

FACTS

3. Licensee is a veterinarian and owner of a clinic in Minneapolis, Minnesota. The clinic employs licensed veterinarians and certified veterinary technicians (CVTs) who report to Licensee. Pursuant to written preventative care procedures (Clinic Procedures) created by Licensee, pet owners who sought well-patient preventative veterinary care services for new patients were scheduled for a specific weekday. Also pursuant to Clinic Procedures, CVTs worked under direct supervision and in the immediate presence of a licensed veterinarian who performed a visual examination of the patient and was immediately available to answer questions or concerns. CVTs obtained physical information about the new patient, such as temperature, pulse, respiration, and the presence or absence of abnormalities. If appropriate under Clinic Procedures, CVTs then provided preventative care treatments, such as administering vaccinations, collecting blood for screening tests, or dispensing flea and tick prevention. Under Clinic Procedures, a veterinarian may not have physically laid hands on the new patient prior to administration of preventative care.

CORRECTIVE ACTION

4. The Committee determined that the conduct described above enabled CVTs to perform the practice of veterinary medicine outside of a veterinary-client-patient relationship and constituted the practice of veterinary medicine by an unlicensed person, which does not comply with Minnesota Administrative Rule 9100.0700, subpart 1(I), and necessitates the following corrective action:

a. Within one month from the date of this Agreement, Licensee shall submit to the Committee documentation of the continuing education for Licensee's most recent license renewal.

b. Within three months from the date of this Agreement, Licensee shall submit to the Committee evidence of completion of at least three (3) credit hours on the topics of ethics

and relationships. For this purpose, the Committee preapproves the online medical records courses offered by Dr. Sarah Babcock, Animal Law and Veterinary Legal Services: “Regulation of Profession” and “Veterinarian Client-Patient Relationship.” The credits from this continuing education may not be applied to the requirements for Licensee’s next license renewal.

OTHER INFORMATION

5. Upon Licensee's satisfactory completion of the corrective action referenced in paragraph 4 above, the Committee agrees to dismiss the complaint(s) concerning the matters referenced above. The Committee shall be the sole judge of satisfactory completion. The Committee may reopen this complaint if it receives newly discovered information that was not available to the Committee during the initial investigation, or if the Committee receives a new complaint that indicates a pattern of behavior or conduct.

6. If Licensee fails to complete the corrective action satisfactorily, the Committee may, at its discretion, reopen the investigation and proceed according to Minnesota Statutes chapter 156 (the Board's Practice Act) and Minnesota Statutes chapters 214 and 14. Licensee agrees that failure to complete the corrective action satisfactorily is failure to cooperate under Minnesota Statutes section 156.123 and may subject Licensee to disciplinary action by the Board.

7. This agreement shall become effective upon execution by the Board's Executive Director and shall remain in effect until the Committee dismisses the complaint, unless the Committee receives additional information that renders corrective action inappropriate. Upon receiving such information, the Committee may, at its discretion, proceed according to Minnesota Statutes chapter 156 (the Board's Practice Act) and Minnesota Statutes chapters 214 and 14.

8. This agreement is not disciplinary action. *See* Minnesota Statutes section 214.103, subdivision 6. However, this agreement is classified as public data pursuant to Minnesota Statutes section 13.41, subdivision 5, and 214.072, subdivision 3.

9. Licensee hereby acknowledges having read and understood this agreement and having voluntarily entered into it. This agreement contains the entire agreement between the Committee and Licensee, there being no other agreement of any kind, verbal or otherwise, which varies the terms of this agreement.



WILLIAM K. FRAHM-GILLES, DVM
Licensee

Dated: 7/25/ , 2025

PAMELA A. JOHNSON, DVM, MPH
Executive Director

Dated: July 29 , 2025