

**BEFORE THE MINNESOTA  
BOARD OF VETERINARY MEDICINE**

In the Matter of  
Stanley L. Thompson, Applicant  
  
Former License No. 00369

**STIPULATION AND ORDER  
FOR REINSTATEMENT**

**STIPULATION**

Stanley L. Thompson, (“Applicant”), and the Minnesota Board of Veterinary Medicine Complaint Review Committee (“Committee”) agree the above-referenced matter may be resolved without trial of any issue or fact as follows:

**I.**

**JURISDICTION**

The Minnesota Board of Veterinary Medicine (“Board”) is authorized pursuant to Minn. Stat. ch. 156 (2008) to license and regulate veterinarians and to take disciplinary action as appropriate. Applicant is subject to the jurisdiction of the Board with respect to the matters referred to in this Stipulation and Order.

**II.**

**PROCEDURAL POSTURE**

The Committee, composed of John Lawrence, D.V.M., Board member, Michelle Vaughn, D.V.M., Board member, took occasion to review Applicant’s petition for reinstatement. Following a thorough review of all available information, the parties agree the matter may now be resolved with a Stipulation and Order.

Applicant is represented by Gary E. Persian, Attorney at Law. Benjamin R. Garbe, Assistant Attorney General, represents the Committee.

### **III.**

#### **FACTS**

The parties agree this Stipulation and Order is based upon the following facts:

1. On February 9, 2010, the Board adopted a Stipulation and Order (“2010 Order”) in which Applicant voluntarily surrendered his license to practice veterinary medicine. The factual basis of the 2010 Order was as follows:

a. Applicant was licensed to practice veterinary medicine in Minnesota on January 27, 1969.

b. Applicant was a close personal friend and colleague of Douglas Jensen, D.V.M., until his death in October 2000. Following Dr. Jensen’s death, his children, Jeffrey Jensen, Scott Jensen, and Wendy Fritz, inherited Dr. Jensen’s practice, the Minnesota Veterinary Hospital, P.A.

c. In 2003, Applicant entered into an agreement with Jeffrey Jensen to allow Mr. Jensen’s company to operate and receive compensation derived from the practice of veterinary medicine at the Minnesota Veterinary Hospital. Mr. Jensen is not a licensed veterinarian.

2. Applicant acknowledged that the factual basis of the 2010 Order constituted a violation of Minn. Stat. § 156.081, subd. 2(12).

3. On October 5, 2011, Applicant submitted a petition for reinstatement of his license to practice veterinary medicine.

### **IV.**

#### **REMEDY**

The parties hereby agree that Applicant’s license to practice veterinary medicine may be reinstated pursuant to the following CONDITIONS:

1. Applicant shall meet all requirements for licensure as of the date of this Stipulation and Order. However, the current requirement to take and pass the North American Veterinary Licensing Examination (“NAVLE”) shall be waived for purposes of this stipulation.

2. Applicant shall meet the continuing education requirement of 40 hours for the March 1, 2012 through February 28, 2014 renewal period.

3. Applicant shall not engage in the purchase, ownership, or management of a veterinary clinic or practice.

4. Applicant shall limit his practice to providing medical care to animals owned by his immediate family members. Applicant shall not provide surgical care to any animal, regardless of whether the animal is owned by an immediate family member or unrelated third party.

5. Upon sufficient proof that Applicant has complied with the foregoing conditions and successfully completed the continuing education requirement, Applicant may petition the Board for an unconditional license on or after March 1, 2014. Successful completion of the foregoing conditions shall be determined by the Committee.

## VI.

### CONSEQUENCES FOR NONCOMPLIANCE OR ADDITIONAL VIOLATIONS

1. If Applicant fails to comply with or violates this Stipulation and Order, Minnesota Statutes chapter 156 (2008), or Minnesota Rules chapter 9100 (2007), the Committee may, in its discretion, seek additional discipline either by initiating a contested case proceeding pursuant to Minnesota Statutes chapter 14 (2008) or by bringing the matter directly to the Board pursuant to the following procedure:

a. The Committee shall schedule a hearing before the Board. At least 20 days prior to the hearing, the Committee shall mail Applicant a notice of the violation(s)

alleged by the Committee. In addition, the notice shall designate the time and place of the hearing. Within ten days after the notice is mailed, Applicant shall submit a written response to the allegations. If Applicant does not submit a timely response to the Board, the allegations may be deemed admitted.

b. The Committee, in its discretion, may schedule a conference with Applicant prior to the hearing before the Board to discuss the allegations and to attempt to resolve the allegations through agreement.

c. Prior to the hearing before the Board, the Committee and Applicant may submit affidavits and written argument in support of their positions. At the hearing, the Committee and Applicant may present oral argument. Argument shall not refer to matters outside the record. The evidentiary record shall be limited to the affidavits submitted prior to the hearing and this Stipulation and Order. Unless stated otherwise in this Stipulation and Order, the Committee shall have the burden of proving by a preponderance of the evidence that a violation has occurred. If Applicant has failed to submit a timely response to the allegations, Applicant may not contest the allegations, but may present argument concerning the appropriateness of additional discipline. Applicant waives a hearing before an administrative law judge, discovery, cross-examination of adverse witnesses, and other procedures governing hearings pursuant to Minnesota Statutes chapter 14.

d. Applicant's correction of a violation prior to the conference, hearing, or meeting of the Board may be taken into account by the Board but shall not limit the Board's authority to impose discipline for the violation. A decision by the Committee not to seek discipline when it first learns of a violation will not waive the Committee's right to later seek discipline for that violation, either alone or in combination with other violations, at any time while this order is in effect.

e. Following the hearing, the Board will deliberate confidentially. If the allegations are not proved, the Board will dismiss the allegations. If a violation is proved, the Board may impose additional discipline, including revocation of Applicant's license.

f. Nothing herein shall limit the Committee's or the Board's right to temporarily suspend Applicant's license pursuant to Minnesota Statutes section 156.126, subdivision 3 (2008), based on a violation of this Stipulation and Order or based on conduct of Applicant not specifically referred to herein.

## VII.

### ADDITIONAL INFORMATION

1. Applicant waives the contested case hearing and all other procedures before the Board to which Applicant may be entitled under the Minnesota and United States constitutions, statutes, or rules.

2. Applicant waives any claims against the Board, the Minnesota Attorney General, the State of Minnesota, and their agents, employees, and representatives related to the investigation of the conduct herein, or the negotiation or execution of this Stipulation and Order, which may otherwise be available to Applicant.

3. This Stipulation and Order, the files, records, and proceedings associated with this matter shall constitute the entire record and may be reviewed by the Board in its consideration of this matter.

4. Either party may seek enforcement of this Stipulation and Order in any appropriate civil court.

5. Applicant has read, understands, and agrees to this Stipulation and Order and has voluntarily signed the Stipulation and Order. Applicant is aware this Stipulation and Order must be approved by the Board before it goes into effect. The Board may either approve the

Stipulation and Order as proposed, approve it subject to specified change, or reject it. If the changes are acceptable to Applicant, the Stipulation and Order will take effect and the order as modified will be issued. If the changes are unacceptable to Applicant or the Board rejects the Stipulation and Order, it will be of no effect except as specified in the following paragraph.

6. Applicant agrees that if the Board rejects this Stipulation and Order or a lesser remedy than indicated in this settlement, and this case comes again before the Board, Applicant will assert no claim that the Board was prejudiced by its review and discussion of this Stipulation and Order or of any records relating to it.

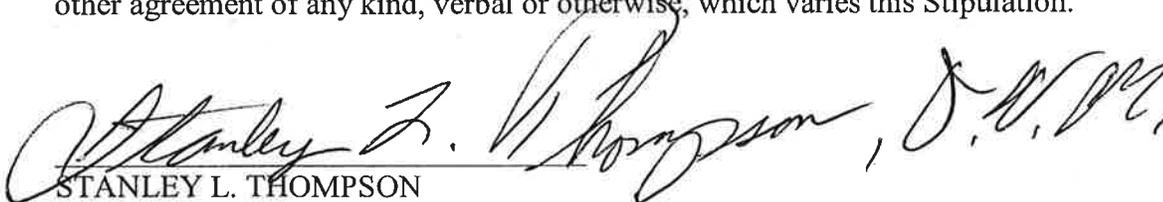
7. This Stipulation and Order shall not limit the Board's authority to proceed against Applicant by initiating a contested case hearing or by other appropriate means on the basis of any act, conduct, or admission of Applicant which constitutes grounds for disciplinary action and which is not directly related to the specific facts and circumstances set forth in this document.

### VIII.

#### DATA PRACTICES NOTICES

1. This Stipulation and Order is classified as public data pursuant to Minnesota Statutes section 13.41, subdivision 5 (2008). Data regarding this action will be provided to data banks as required by Federal law or consistent with Board policy.

2. This Stipulation contains the entire agreement between the parties, there being no other agreement of any kind, verbal or otherwise, which varies this Stipulation.

  
STANLEY L. THOMPSON  
Applicant

Dated: 8-24, 2012

**ORDER**

Upon consideration of the Stipulation and all the files, records and proceedings herein, Applicant's license to practice veterinary medicine is reinstated and placed in a CONDITIONAL STATUS, and all other terms of the Stipulation are approved and adopted, and the recommended remedy set forth in the Stipulation is hereby issued as an Order of this Board effective this 5<sup>th</sup> day of September, 2012.

MINNESOTA BOARD  
OF VETERINARY MEDICINE

  
JOHN KING, D.V.M.  
Executive Director

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