**STATE OF MARYLAND**
**DEPARTMENT OF AGRICULTURE**
**BEFORE THE STATE BOARD OF VETERINARY MEDICAL EXAMINERS**

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| IN THE MATTER OF: | * | |
| KARA CHAPLIN SCHOEPP, D.V.M. | * | DOCKET NO. 13-54 |
| LICENSE NO. 4205 | * | |

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## CONSENT AGREEMENT AND ORDER

This Consent Agreement and Order (Consent Agreement), dated this 28th day of OCTOBER, 2013, is between the Maryland State Board of Veterinary Medical Examiners (Board) and Kara Chaplin Schoepp, D.V.M. (Dr. Chaplin Schoepp), License No. 4205. This Consent Agreement resolves the charges filed by the Board on July 15, 2013 in Docket Number 13-54, alleging that Dr. Chaplin Schoepp violated COMAR 15.14.01.10 pertaining to record keeping. The violation allegedly occurred on or about October 8, 2012, regarding documentation of the care and treatment of Ilene Russell's 14-year-old spayed female Pug, "Jellibean." On July 23, 2013, Dr. Chaplin Schoepp asked to resolve the matter without a hearing. Subsequently, the parties were able to reach a resolution. By entering into this Consent Agreement, Dr. Chaplin Schoepp waives the right to a hearing and appeal on the charge in Docket Number 13-54. Since being licensed in Maryland in 1993, Dr. Chaplin Schoepp has a prior disciplinary history with the Board of a consent agreement in Docket No. 02-26 in 2004.

Under State law, the Board is the licensing authority responsible for regulating the practice of veterinary medicine in this State, which includes filing disciplinary actions against veterinarians charged with violating provisions of the Veterinary Practice Act, Agriculture Article §§ 2-301through 2-316, Annotated Code of Maryland, and related regulations. As part of its authority, the Board "may refuse, suspend, or revoke any application or license, and censure or place on probation any licensee . . . if the veterinarian or veterinary practitioner . . . [f]ails to comply with Board rules and regulations after receiving a license[.]" Md. Code Ann., Agric. Art. § 2-310(8). In addition, the Board may impose a civil penalty of not more than $5,000 for a first offense, or $10,000 for a second or subsequent offense, in lieu of or in addition to suspending, or revoking a veterinarian's license, respectively. Md. Code Ann., Agric. Art. § 2-310.1. In setting the amount of a civil penalty, the Board shall consider the severity of the violation, the good faith of the violator, and any history of prior violations, as well as the Board's regulatory civil penalty

standards. Md. Code Ann., State Gov't Art. § 10-1001(b); COMAR 15.14.11 Civil Penalty Standards for Veterinarians.

## FINDINGS OF FACT AND CONCLUSIONS OF LAW

Dr. Chaplin Schoepp, by entering into and signing this Consent Agreement, while generally and specifically denying liability in this case, agrees to the provisions of this Consent Agreement, acknowledging that the Board has sufficient evidence to find as fact and conclude as a matter of law that she did violate a certain regulation adopted under the Veterinary Practice Act; specifically, COMAR 15.14.01.10 pertaining to record keeping, on or about October 8, 2012, regarding documentation of the care and treatment of Ilene Russell's 14-year-old spayed female Pug, "Jellibean."

Taking all the facts and circumstances into consideration, including the severity of the violation, Dr. Chaplin Schoepp's prior disciplinary history with the Board since her licensing in 1993, and Dr. Chaplin Schoepp's good faith effort to resolve this matter promptly, the Board concluded that the most reasonable and appropriate resolution in this matter included the following sanctions.

## ORDER

Based on the foregoing Findings of Fact and Conclusions of Law, it is this 28th day of OCTOBER, 2013, by the Maryland State Board of Veterinary Medical Examiners, ORDERED that:

A. For the violation of COMAR 15.14.01.10 Record Keeping, Dr. Kara Chaplin Schoepp, License No. 4205, is assessed a civil penalty in the total amount of $600; payment shall be made to the "Maryland Department of Agriculture" with the notation "SBVME – 13-54" within 30 days of the date of this Order. In lieu of the civil penalty, Dr. Chaplin Schoepp may make a charitable donation to the Animal Welfare League of Montgomery Count in the amount of $600, payment to be made within 30 days of the date of this Order with proof of the donation from the Foundation to be submitted to the Board within 60 days of the date of this Order.

B. Dr. Chaplin Schoepp shall serve a period of probation of six months. While on probation, the veterinarian shall obey all laws and regulations governing the practice of veterinary medicine in this State and the conditions of this Consent Agreement. Violation of probation means that the veterinarian is charged and the Board ultimately concludes that the veterinarian violated the Veterinary Practice Act, related regulations, or the terms of this Consent Agreement during the period of probation. Violation of probation may result in additional sanctions.

C.

D. As a condition of probation, Dr. Chaplin Schoepp shall complete continuing education (CE) in the drugs and record-keeping module of Dr. James Wilson's on-line course, Veterinary Law and Ethics, within 90 days of this Order. Within 30 days of completion of the CE, the veterinarian shall forward to the Board documentation from the CE provider showing proof of completion of the CE credits required under this Order. Proof from the CE provider shall include Dr. Chaplin Schoepp's name, the number of hours or modules of CE completed, the topics covered, and the dates the CE credits were obtained. Completion of this CE will **not** be counted towards the 18 credit hours of CE required annually for re-registration of the veterinary license.

David L. Handel, DVM

David L. Handel, D.V.M.
Vice President
State Board of Veterinary Medical Examiners

## CONSENT

I, Kara Schaepp, acknowledge that I have had an opportunity to consult with legal counsel before entering into and signing this document. By this Consent, I hereby acknowledge the legal authority and the jurisdiction of the Board over this matter and to issue and enforce this Consent Agreement. In order to resolve this matter, I agree to accept and submit to the foregoing Consent Agreement, consisting of four pages, including this page. I sign this Consent without reservation as my voluntary act after having had an opportunity to consult with counsel, and I acknowledge that I fully understand the language, meaning, and terms of this Consent Agreement.

October 23, 2013
Date

Kara Schaepp, D.V.M.

## NOTARY

STATE OF Maryland

CITY/COUNTY OF Frederick

I HEREBY CERTIFY that on this 23 day of October, 2013, before me, a Notary Public of the State and City/County aforesaid, personally appeared Kara Schaepp, D.V.M., and made oath in due form of law that the foregoing Consent Agreement and Order was her voluntary act and deed.

AS WITNESS my hand and notarial seal.

Jacob A. Hahn
Notary Public

My Commission expires: 12 - 04 - 2017

JACOB A HAHN
NOTARY PUBLIC
FREDERICK COUNTY, MD
MY COMMISSION EXPIRES DECEMBER 4, 2017