

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

IN THE MATTER OF:

REDA YOUSSEF, D.V.M.  
LICENSE NO. 6555

DOCKET NO. 22-48

\* \* \* \* \*

**CONSENT AGREEMENT AND ORDER**

This Consent Agreement and Order ("Consent Agreement"), dated this 8<sup>th</sup> day of April 2022, is between the State Board of Veterinary Medical Examiners ("SBVME" or "Board") and Reda Youssef, D.V.M. ("Dr. Youssef"), License No. 6555. This Consent Agreement resolves a case arising from a complaint filed with the SBVME in November 2021, alleging that Dr. Youssef did not satisfy the Veterinary Practice Act, Md. Code Ann., Agric. §§ 2-301 – 2-316 and related Code of Maryland Regulations ("COMAR") 15.14.01 – 15.14.17 set forth herein.

On April 6, 2022, Dr. Youssef, through legal counsel, having been advised regarding his due process rights, agreed to resolve this case under the terms and conditions reflected in this Consent Agreement without formal charges. By signing this Consent Agreement, Dr. Youssef agrees to waive his due process rights for Docket No. 22-48, including the right to a hearing, and further agrees to the terms and conditions specified.

Under Maryland law, the SBVME 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 the provisions of the Veterinary Practice Act and related COMAR regulations. As part of its authority, the SBVME "may refuse, suspend, or revoke any application or license, and censure or place on probation any licensee ... if the veterinarian ... [f]ails to comply with Board rules and regulations after receiving a license." Md. Code Ann., Agric. § 2-310(8). The Board may also 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. Agric. § 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 civil penalty standards. Md. Code Ann., State Gov't. § 10-1001(b); COMAR 15.14.11 (Civil Penalty Standards for Veterinarians).

### **FINDINGS OF FACT AND CONCLUSIONS OF LAW**

Reda Youssef, D.V.M., License Number 6555, by signing and agreeing to this Consent Agreement after having had the opportunity to seek the advice of counsel, agrees to the provisions of this Consent Agreement, acknowledging that the SBVME has sufficient evidence to find, as fact, and to conclude as a matter of law that Dr. Youssef did not satisfy COMAR 15.14.01.10-1 (Client Consent for Companion Animals and Hospitalized Animals) as set forth herein:

1. Dr. Youssef is a veterinarian licensed to practice in Maryland, where he has been licensed since March of 2010. Dr. Youssef is the owner and responsible veterinarian at Padonia Veterinary Hospital ("Hospital") (License Number: 03-022), located at 9827 York Rd, Cockeysville, MD 21030. Dr. Youssef has no disciplinary history with the Board.
2. This case involves veterinary care and treatment provided to Pi, a stray female cat found by Caroline Butler and her sister, Erin Butler. Pi presented to the Hospital for spay surgery. At the time of the events giving rise to this Consent Agreement, Caroline Butler was the hospital manager at Dr. Youssef's veterinary hospital.
3. On Thursday, October 28, 2021, a client holding a cat in a carrier entered the lobby. A receptionist from the Hospital greeted the client (who turned out to be Erin Butler) and asked the name of the pet in the carrier. Caroline Butler was in the reception area at the time, and identified the client as her sister, Erin Butler.
4. Caroline Butler took the cat in the carrier back to the Hospital's kennel area. Erin Butler left the building without providing any client information or signing a client consent for treatment form. This was contrary to Hospital protocols, which require all owners to provide written consent before treatment. Under normal circumstances, the Hospital staff, including Caroline Butler, would have been responsible for

obtaining client information, providing an estimate of charges, and obtaining written consent. Because the client was the sister of the Hospital's office manager, this procedure was not followed.

5. On the same day, October 28, 2021, Dr. Youssef left the Hospital at 3 p.m., so Dr. Nabil Anis, D.V.M. ("Dr. Anis") (License No. 4576) was Pi's attending veterinarian. With Caroline Butler present, Dr. Anis performed a wellness/pre-surgical exam and found that Pi appeared healthy. Dr. Anis took a fecal sample, administered rabies and FVRCP vaccinations, and dewormed Pi. The plan was for surgery to occur the next day, Friday, October 29, 2021, with Caroline Butler assisting Dr. Youssef.

6. On the morning of Friday, October 29, 2021, Caroline Butler texted Dr. Youssef that she was sick and would not be able to come to work. Another employee agreed to cover her shift. Originally, Caroline Butler had planned to be there for the spay surgery and Pi's post-surgical recovery. When she called out sick, Dr. Youssef considered delaying the surgery for a day. However, because the Hospital closes early on Saturdays, there would be no one to monitor Pi during the weekend. Therefore, Dr. Youssef opted to move forward with the surgery as planned.

7. Dr. Youssef examined Pi prior to the spay procedure, who appeared healthy. Unfortunately, while a hospital veterinary technician was prepping Pi for her surgery, Pi exhibited bradycardia (slower than normal heart rate). Dr. Youssef promptly administered atropine, turned off the isoflurane, and increased intravenous fluids to 20 ml/minute. Approximately one minute later, Pi arrested. Dr. Youssef promptly administered a second dose of atropine and a dose of epinephrine. Dr. Anis assisted Dr. Youssef and began manual CPR and bagging oxygen. A veterinary technician assisted by drawing up emergency medications. They administered another dose of epinephrine and continued ventilation, chest compressions, and CPR. Unfortunately, Pi could not be resuscitated.

8. Dr. Youssef then tried to call Caroline Butler to inform her about Pi's death, but she did not answer the phone. Dr. Youssef texted her several times during the afternoon of October 29, 2021, but could not make contact with her. He wanted to deliver the news directly to Caroline Butler, rather than leaving a voice message. On the morning of Saturday, October 30, 2021, Dr. Youssef was able to reach Caroline Butler over the phone, and he shared the unfortunate news about Pi. Dr. Youssef explained what had happened

with Pi, and Caroline Butler responded in an upset but polite manner. She later texted Dr. Youssef to thank him for letting her know the outcome.

9. At approximately 10 a.m. on the same day, Erin Butler called the Hospital. Dr. Youssef briefly spoke with Erin Butler, before she hung up the phone. After Erin Butler terminated the call, Caroline Butler called the Hospital and told a receptionist that Erin Butler was coming to the Hospital to discuss Pi's death.

10. When Erin Butler arrived at the Hospital, she was highly distraught. Dr. Youssef met with Erin Butler in a private area and provided Erin Butler with a copy of Pi's medical records.

11. Caroline Butler also came to the Hospital later that morning. She was upset about Pi and gave Dr. Youssef a letter of resignation from her position at the Hospital. During his discussions with Caroline Butler, Dr. Youssef expressed his condolences for the loss of Pi. Because neither of the Butlers had signed a consent form for Pi's surgery, Dr. Youssef asked Caroline Butler to sign the document. She refused.

12. Caroline Butler later filed a complaint with the Board against Dr. Youssef. The Board opened a file, conducted an investigation, and reviewed the evidence.

13. After its review, the Board found no evidence that Dr. Youssef's care and treatment of Pi departed from the standard of care required of veterinarians in this State. There was no evidence suggesting that Dr. Youssef caused or contributed to Pi's unfortunate passing.

14. While Dr. Youssef complied with the standard of care in his care and treatment of Pi, he did not satisfy the standard set forth in COMAR 15.14.01.10-1 (Client Consent for Companion Animals and Hospitalized Animals). COMAR 15.14.01.10-1 requires, for a non-emergency presentation, that a veterinarian inform the client in a manner that is understandable by a reasonable person, of the diagnostic and treatment plan . . ." In addition, the regulation states that the veterinarian shall ". . . provide a written estimate of the charges for veterinary services, and obtain the client's signature indicating acknowledgment and approval . . ." before a veterinarian performs surgery or hospitalizes a companion animal.

15. In this particular case involving Pi, Dr. Youssef and his staff did not provide a written estimate of charges for Pi's surgery to either of the Butlers, did not document that he provided a diagnostic and treatment plan, and did not obtain a client signature consenting to treatment, as required by the Board's

regulations. The lack of a client consent form or other written client information led to confusion regarding who owned Pi.

Taking the facts and circumstances into consideration, including the nature of the violation(s), the veterinarian's lack of disciplinary history, and his acceptance of responsibility and good faith cooperation in resolving this matter, the Board concluded that the most reasonable and appropriate resolution includes the sanctions set forth below.

**ORDER**

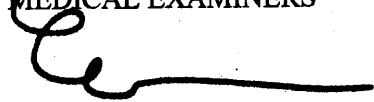
Based on the foregoing Findings of Fact and Conclusions of Law, it is this 8<sup>th</sup> day of April, 2022, by the State Board of Veterinary Medical Examiners, ORDERED that:

- (a) For not satisfying COMAR 15.14.01.10-1 (Client Consent for Companion Animals and Hospitalized Animals) by not preparing an estimate of charges for services planned for Pi and not obtaining written consent for Pi's treatment and surgery, Dr. Youssef is assessed a civil penalty of \$300;
- (b) Dr. Youssef shall pay the civil penalty within thirty (30) days from the date of this Order by check payable to the Maryland Department of Agriculture ("MDA") with the notation "SBVME - 22-48" sent to the MDA at 50 Harry S. Truman Parkway, Annapolis, MD 21401; and
- (c) This is a public order.

WITNESS the hand of the State Board of Veterinary Medical Examiners, State of Maryland, this

8<sup>th</sup> day of April, 2022.

STATE BOARD OF VETERINARY  
MEDICAL EXAMINERS

  
\_\_\_\_\_/NEB

Elizabeth Callahan, D.V.M.

President

State Board of Veterinary Medical Examiners  
Maryland Department of Agriculture

**CONSENT**

I, Reda Youssef, D.V.M., acknowledge that I have had an opportunity to consult with counsel before entering into this Consent Agreement. By this Consent, I hereby acknowledge the legal authority and jurisdiction of the Board over this matter 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 7 pages. I sign this Consent Agreement without reservation as my voluntary act and deed after having had an opportunity to consult with counsel, and I acknowledge that I fully understand and comprehend the language, meaning, and terms of this Consent Agreement.

Date:

4-6-2022



Reda Youssef, D.V.M.