



United States
Department of
Agriculture

22, 2009

October

Animal and Plant
Health Inspection
Service

MEMORANDUM

Veterinary Services

8100 NW 15th Place
Gainesville, FL 32606

352-313-3060
352-313-3062 (fax)

TO: [Redacted]
IES Compliance Case Examiner
Riverdale, MD 20737

FROM: [Redacted]
Area Veterinarian In Charge

SUBJECT: IES Cases FX06433-VS and FL08701-VS

Please close these cases out as Fact Finding Investigations revealed no violations.

em:

[Redacted] IES, Raleigh, NC
Ulysses Lane. Associate Director. VS Eastern Region, Raleigh, NC
[Redacted] FL
[Redacted] IES Investigator, FL

CLOSED



Safeguarding American Agriculture

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UNITED STATES DEPARTMENT OF AGRICULTURE
ANIMAL AND PLANT HEALTH INSPECTION SERVICE
INVESTIGATIVE AND ENFORCEMENT SERVICES

REPORT OF INVESTIGATION

Case Number: FL08701-VS

Subject(s): Dr. Lisa Paige Thompson
(Contact Information) 311 N.E. 45th Terrace
Ocala, FL 34470
351-843-8508

Investigator:
(Contact Information)

(b)(6), (b)(7)c

USDA, APHIS, IES
920 Main Campus Drive, Suite 200
Raleigh, NC 27606

(b)(6), (b)(7)c

Date of Report: 09/21/09

- Substantiated allegation(s)**
- No violation(s)**
- Insufficient evidence**
- Fact finding**
- Contains Confidential Business Information**

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Reviewed by Area Manager

SYNOPSIS

A complaint was received in the USDA, Veterinary Services (VS) Office in Gainesville, Florida that Dr. Lisa Paige Thompson (THOMPSON) violated her USDA Accreditation Standards by failing to inspect horses within 10 days prior to issuing Official Equine Certificates of Veterinary Inspection (Health Certificates) and failing to insure the Certificates were accurately completed. The complaint alleges that this occurred on 11/11/05, 05/18/07, and 03/13/08.

<u>ALLEGED VIOLATIONS</u>		
Subject(s)	Date(s)	Citation
THOMPSON	11/01/05	9 CFR 161.3 (a) 9 CFR 161.3 (h)
THOMPSON	05/18/07	9 CFR 161.3 (a) 9 CFR 161.3 (b) 9 CFR 161.3 (h)
THOMPSON	03/13/08	9 CFR 161.3 (a) 9 CFR 161.3 (b) 9 CFR 161.3 (h)

Case Number: FL08701-VS

Date: 09/21/09

BACKGROUND

Subject(s) Information

Thompson is a [REDACTED] graduate of the University of Florida, College of Veterinary Medicine and holds Florida Veterinary Medical License VM-006818. Thompson was USDA Accredited in December 1995. Thompson's Veterinary practice is a 100 % horse mobile sports medicine practice and operates under the name Paige Thompson, DVM.

Subject(s) Previous History

Prior Enforcement Actions

N/A

Prior Adjudications

N/A

NARRATIVE

Basis for Investigation

At a verbal request by the Area Veterinarian in Charge (AVIC), USDA, Veterinary Services, an investigation was opened into the possible violation(s) of Thompson's Veterinary Accreditation Standards. The original complaint had been made to the Florida Business and Professional Regulation agency.

Investigative Findings

On or about 11/01/05, 05/18/07, and 03/13/08, (Exhibits 1, 2, and 3) THOMPSON issued Official Equine Certificates of Veterinary Inspection to Allana Wiggin, Brooksville, Florida.

In an affidavit by Allana Wiggin (Exhibit 4) she states that THOMPSON did not inspect the horse listed on the Certificate dated 11/01/05 (Exhibit 1). Wiggin further states that THOMPSON did not inspect the animal on the Certificate dated 05/18/07 (Exhibit 2) and that the origin and destination of the horse listed on this Certificate was not correct. Wiggin states that THOMPSON issued a Certificate dated 03/13/08 (Exhibit 3) for two animals and that THOMPSON did not inspect either horse and that the Certificate was not correct as to the origin and destination of the horses.

In an interview with THOMPSON on 08/14/09, (Exhibit 5) she stated that at the current time, she was in civil litigation with Dave and Allana Wiggin and that Wiggin had told her clients she was going to "get" THOMPSON's Veterinary License. THOMPSON stated that she did in fact inspect Wiggin's horses within 10 days prior to issuing any Certificate. THOMPSON stated that on one occasion she refused to issue a Certificate until she had a copy of the EIA (Coggins) test report in hand. THOMPSON stated that she did receive the EIA test papers and went ahead and issued the Certificate but this had been within 10 days of having inspected the horse in question.

THOMPSON stated that her litigation involved co-ownership of a horse named Only The Best Willdo and unpaid veterinary bills. THOMPSON stated that Wiggin had tried to change the ownership papers on Only the Best Willdo without her knowledge and had removed the animal to Oklahoma without the courts permission. THOMPSON stated that the judge had ruled that Wiggin pay the veterinary bills (Exhibit 6) and that she was waiting on a hearing for the ownership issue of the horse Only The Best Willdo.

THOMPSON stated that she is aware of her responsibilities as a USDA Accredited Veterinarian and that to the best of her knowledge, she has never issued a Certificate for an animal without having first inspected the animal within the time period required.

THOMPSON declined to make a written statement stating that she was currently being represented by an attorney in regards to the ongoing civil litigation involving Wiggin. THOMPSON stated that Wiggin had filed a complaint against her with the State of Florida, Department of Business and Professional Regulation (BPR) (Exhibit 7) and that the PBR found no wrong doing on her part

(THOMPSON) (Exhibit 8).

Contact with Mr. Irwin Weiner, attorney for THOMPSON, was made on 09/09/09 (Exhibit 9). Weiner stated that because THOMPSON was still in litigation with Wiggin, he did not want THOMPSON to provide a written statement on the matter. Weiner agreed to send me a letter responding to the complaint by Wiggin (Exhibit 10).

These findings substantiate the following alleged violation(s):

N/A

These findings indicate there is insufficient evidence to substantiate an alleged violation.

MITIGATING AND/OR AGGRAVATING FACTORS

N/A

ADDITIONAL INFORMATION

Letter and Application for Veterinary Accreditation showing THOMPSON was USDA Accredited in December 2005 (Exhibit 11). Written responses on behalf of THOMPSON by Attorney Irwin Weiner to Florida Department of Business and Professional Regulation, dated 09/25/08 and 10/20/08 (Exhibits 12 and 13).

WITNESS LIST		
<i>Provide First, MI and Last Name with Complete Address</i>		
Name	Title	Address / Phone Number
(b)(6), (b)(7)c		USDA, APHIS, IES 920 Main Campus Dr. Suite 200 Raleigh, NC 27606 (b)(6), (b)(7)c
Allana Wiggin	Insurance Agent	P.O. Box 12021 Brooksville, FL 34603 352-585-7467

Case Number: FL08701-VS

Date: 09/21/09

CASE REPORT DISTRIBUTION (cc)

Program Official(s)

[REDACTED]
USDA, APHIS, VS
8100 NW 15th Place
Gainesville, FL 32606

[REDACTED]
USDA, APHIS, IES
15444 SW 32 Terrace
Miami, FL 33185

CASE UPDATES

Program Official(s)

[REDACTED]
USDA, APHIS, VS
Gainesville, FL

Primary Investigator

[REDACTED] (b)(6), (b)(7)c
USDA, APHIS, IES
Florida

[REDACTED]
USDA, APHIS, IES
Miami, FL

IES Deputy Regional Director

Willie Harris, Deputy Regional Director
USDA, APHIS, IES
Raleigh, NC

IES Regional Director

John Kinsella, Eastern Regional Director
USDA, APHIS, IES
Raleigh, NC

EXHIBIT LIST

Exhibit #	Description	Date	Total Pages
Exhibit 1	Photocopy of Official Equine Certificate of Veterinary Inspection, Number 017083	11/01/05	1
Exhibit 2	Photocopy of Official Equine Certificate of Veterinary Inspection, Number 076445	05/18/07	1
Exhibit 3	Photocopy of Official Equine Certificate of Veterinary Inspection, Number 067507	03/13/08	1
Exhibit 4	Affidavit of Allana Wiggin	05/26/09	2
Exhibit 5	Interview Log	08/14/09	1
Exhibit 6	Photocopy of Final Judgment Order Case No. 32 2008 SC 3314	09/05/08	1
Exhibit 7	Photocopy of Complaint to Department of Business and Professional Regulation	08/20/08	3
Exhibit 8	Photocopy of Response from Business and Professional Regulation	03/09/09	1
Exhibit 9	Memorandum to the File	09/10/09	1
Exhibit 10	Letter response from Irwin Weiner, Attorney at Law	09/14/09	2
Exhibit 11	Letter of Accreditation and Application for Veterinary Accreditation	12/08/95	2
Exhibit 12	Photocopy of Letter to Business and Professional Regulation agency	09/25/08	2
Exhibit 13	Photocopy of Letter to Business and Professional Regulation agency	10/20/08	1



Florida Department of Agriculture and Consumer Services
 Division - Animal Industry
 Bureau of Animal Disease Control

No. EqF 017083

OFFICIAL EQUINE CERTIFICATE OF VETERINARY INSPECTION

585.08(2), Florida Statutes, 5C-3.003, Florida Administrative Code

Purpose of Movement

Racing Show
 Training Other
 Breeding

CHARLES H. BRONSON
 Commissioner of Agriculture

Alana Wagner S. CONSIGNOR
 18101 Margaret Smith Rd
 Brooksville, FL 34603
 City, State, Zip Code

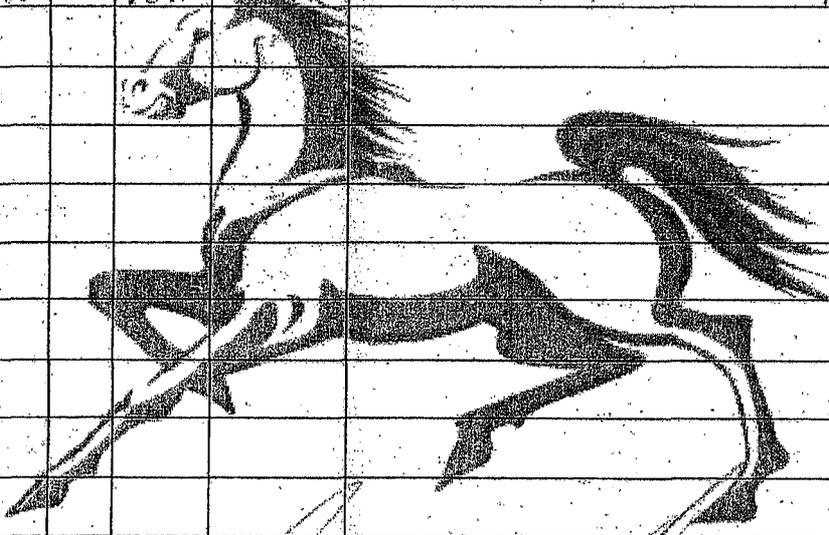
PA International CONSIGNEE OR DESTINATION
 Perry, GA
 City, State, Zip Code

DATE OF EXAMINATION: 10.1.05

NUMBER OF HORSES: 1

LOCATION OF EXAM: [Blank]

NAME	AGE	BREED	SEX	TEMP	COLOR	SUBSEQUENT DESCRIPTION: MARKINGS, BRANDS, TATTOO NUMBER	NEGATIVE EIA TEST INFORMATION		
							DATE	LAB ACCESSION # NAME	STATE
1. Dec Lee	1	And	F	101.0	White		9.16.05	Kiss 025826	FL
2.									
3.									
4.									
5.									
6.									
7.									
8.									
9.									
10.									



ISSUING VETERINARIAN'S CERTIFICATION: I certify, as a FLORIDA accredited veterinarian, that the above described animals have been inspected by me personally and that they are not showing signs of infectious, contagious and/or communicable diseases (except where noted). The vaccinations and results of tests are as indicated on this certificate. To the best of my knowledge, the animals listed on this certificate meet the state of destination and federal interstate requirements. No further warranty is made or implied.

PRINTED ADDRESS OF VETERINARIAN MUST INCLUDE

Dr. Page / 11011 501 /
 NAME

311-D-45 /
 ADDRESS

Dade, FL 34440
 CITY, STATE, ZIP

PHONE # FAX #

SIGNATURE OF VETERINARIAN

[Signature]

OWNER/AGENT STATEMENT (When Applicable): The animals in this shipment are those certified and listed on this certificate.

SIGNATURE OF OWNER/AGENT

FL License Number 6818

Date 10.1.05

VALID FOR 30 DAYS FOLLOWING EXAMINATION



CHARLES H. BRONSON
COMMISSIONER

Florida Department of Agriculture and Consumer Services
Florida Department of Agriculture and Consumer Services
Division of Animal Industry
Bureau of Animal Disease Control

OFFICIAL EQUINE CERTIFICATE OF VETERINARY INSPECTION

585.08(2), Florida Statutes, 5C-3.003, Florida Administrative Code

No. PNF	076445
No. EqF	076445
Purpose Of Movement	
<input type="checkbox"/> Racing	<input checked="" type="checkbox"/> Show
<input type="checkbox"/> Training	<input type="checkbox"/> Other
<input type="checkbox"/> Breeding	

CONSIGNOR Vaughan	CONSIGNEE OR DESTINATION Hartman	DATE OF EXAMINATION 5-18-07
ADDRESS 10220 10th St Opola, FL 34477	ADDRESS L... C... FL	NUMBER OF HORSES 1
CITY, STATE, ZIP CODE	CITY, STATE, ZIP CODE	LOCATION OF EXAM Vaughan

NAME	AGE	BREED	SEX	TEMP	COLOR	SUBSEQUENT DESCRIPTION: MICROCHIP, MARKINGS, BRANDS, TATTOO NUMBER	NEGATIVE EIA TEST INFORMATION		
							DATE	LAB ACCESSION #	NAME
1. Only the best of build	6	QH	M	101.0	Bay		4/11/07	PVL70711572	FL
2.									
3.									
4.									
5.									
6.									
7.									
8.									
9.									
10.									

THIS SHIPMENT
PASSED
MAY 2 - 2008
STATION 9A

ISSUING VETERINARIAN'S CERTIFICATION: I certify, as a FLORIDA accredited veterinarian, that the above described animals have been inspected by me personally and that they are not showing signs of infectious, contagious and/or communicable diseases (except where noted). The vaccinations and results of tests are as indicated on this certificate. To the best of my knowledge, the animals listed on this certificate meet the state of destination and federal interstate requirements. No further warranty is made or implied.

PRINTED ADDRESS OF VETERINARIAN MUST INCLUDE:

NAME: [Signature]

CLINIC NAME: [Signature]

ADDRESS: [Signature]

CITY, STATE, ZIP: Opola, FL 34470

PHONE # [Signature]

FAX: [Signature]

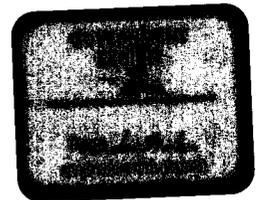
SIGNATURE OF VETERINARIAN

[Signature]

FL License Number	DATE
6010	5/17/07

VALID FOR 30 DAYS FOLLOWING EXAMINATION

TO ACCOMPANY SHIPMENT





Florida Department of Agriculture and Consumer Services
Division of Animal Industry
Bureau of Animal Disease Control

No: 067507
EqF

OFFICIAL EQUINE CERTIFICATE OF VETERINARY INSPECTION
OFFICIAL EQUINE CERTIFICATE OF VETERINARY INSPECTION

585.08(2), Florida Statutes, 5C-3.003, Florida Administrative Code

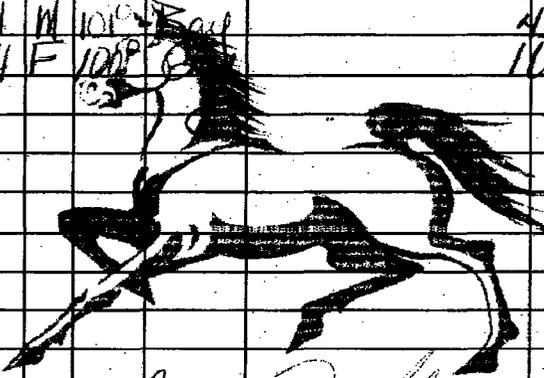
Purpose of Movement	
<input type="checkbox"/> Racing	<input checked="" type="checkbox"/> Show
<input type="checkbox"/> Training	<input type="checkbox"/> Other
<input type="checkbox"/> Racing	<input checked="" type="checkbox"/> Show
<input type="checkbox"/> Training	<input type="checkbox"/> Other
<input type="checkbox"/> Breeding	

CHARLES H. BRONSON
COMMISSIONER

Sandy Vaughan CONSIGNOR Georgia State Fair CONSIGNEE OR DESTINATION 3-13-08 DATE OF EXAMINATION

Ocala, FL 34482 ADDRESS Ferry, GA ADDRESS 2 NUMBER OF HORSES
CITY, STATE, ZIP CODE CITY, STATE, ZIP CODE LOCATION OF EXAM

NAME	AGE	BREED	SEX	TEMP	COLOR	SUBSEQUENT DESCRIPTION MICROCHIP MARKING	APPLICABLE TESTS
1. <u>Only One Best</u>	<u>2</u>	<u>QH</u>	<u>M</u>	<u>101.2</u>	<u>Bay</u>		<u>4/17/07 AVH 20711572 FL</u>
2. <u>Wood Fire</u>	<u>6</u>	<u>QH</u>	<u>F</u>	<u>100.8</u>	<u>B</u>		<u>10/11/07 AVH 20730395 FL</u>
3.							
4.							
5.							
6.							
7.							
8.							
9.							
10.							



ISSUING VETERINARIAN'S CERTIFICATION: I certify, as a FLORIDA accredited veterinarian, that the above described animals have been inspected by me personally and that they are not showing signs of infectious, contagious and/or communicable diseases (except where noted). The vaccinations and results of tests are as indicated on this certificate. To the best of my knowledge, the animals listed on this certificate meet the state of destination and federal interstate requirements. No further warranty is made or implied.

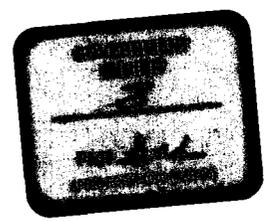
PRINTED ADDRESS OF VETERINARIAN MUST INCLUDE
NAME: Dr. Paige Thompson
CLINIC NAME:
ADDRESS: 311 N. DEHART ST
CITY, STATE, ZIP:
PHONE: Ocala, FL 34411

SIGNATURE OF VETERINARIAN
[Signature]

FL Lic. Use No. 6018 3/13/08

VALID FOR 30 DAYS FOLLOWING EXAMINATION

TO ACCOMPANY SHIPMENT



AFFIDAVIT

I, Allana Wiggin, being duly sworn on oath make the following statement:

I make the following statement to Michael Ray who has identified himself to me as a Senior Investigator with the U.S. Department of Agriculture, APHIS, Investigative and Enforcement Services.

I am a self-employed insurance agent and have been for ten (10) years and my address is P.O. Box 12021, Brooksville, FL 34603, telephone 352-585-7467.

As a hobby, my husband and I buy, sell, show and breed horses.

In 2005, Dr. Paige Thompson, Ocala, Florida, was our veterinarian when dealing with our show horses. We stopped using Dr. Thompson in May 2008.

Dr. Thompson issued an Official Equine Certificate of Veterinary Inspection for a horse named Dee Dee that belonged to me. Dr. Thompson did not inspect this horse prior to issuing this Certificate. The Certificate number is EQF – 017083, dated 11-11-05.

On or about 05/18/07, Dr. Thompson issued another Official Equine Certificate of Veterinary Inspection, Number 076445, for a horse named Only The Best Willdo. Dr. Thompson showed Sandy Vaughn as the consignor of the horse but the horse was not inspected by Dr. Thompson at that location. I met Dr. Thompson for lunch that day and she provided me the Certificate without ever having inspected Only The Best Willdo. The Certificate shows the horse is going to Conyers, GA but he was actually going to Tulsa, Oklahoma.

Allana Marie Wiggin

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at **19259 Cortez Blvd., Brooksville, FL 34603** on this 26th day of May, 2009.

APHIS FORM 7162 Replaces VS Form 3-59G which is obsolete. (NOV 92)



Michael Ray

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS, AUTHORITY NO: 2686

AFFIDAVIT

I, Allana Wiggin, being duly sworn on oath make the following statement:

On or about 03/13/08, Dr. Thompson issued an Official Equine Certificate of Veterinary Inspection, Number 067507, for two horses, Only The Best Willdo and WindFirePhoton, (we call her Splash). Dr. Thompson did not inspect either horse prior to issuing the Certificate. I met her at Horse and Hounds and she provided me the Certificate. The consignor is listed as Sandy Vaughn but neither horse had been there and the destination was not Perry, GA but was Covington, GA.

I have reviewed the above listed Certificates of Veterinary Inspection with Michael Ray.

I have read this statement and it is true and correct to the best of my knowledge and belief and I have made all necessary corrections.

-----NOTHING FOLLOWS-----

Allana Marie Wiggin

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at **19259 Cortez Blvd., Brooksville, FL 34603** on this 26th day of May, 2009.

APHIS FORM 7162 Replaces VS Form 3-59G which is obsolete. (NOV 92)



Michael Ray

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS, AUTHORITY NO: 2686

<h1>INTERVIEW LOG</h1> <h2>USDA, APHIS, IES</h2>	<p>NAME AND ADDRESS OF PERSON(S) CONTACTED: Dr. Lisa Paige Thompson 311 N.E. 45th Terrace Ocala, FL 34470</p>	<p>DATE: August 14, 2009</p>
--	---	--

<p>TYPE OF INTERVIEW (BY PHONE OR IN PERSON): In Person</p>	<p>ORGANIZATION: Paige Thompson, DVM</p>	<p>TELEPHONE NUMBER: [REDACTED]</p>
<p>SUBJECT: Allegations of violations of Veterinary Accreditation Standards</p>		<p>LOCATION OF INTERVIEW: [REDACTED]</p>

SUMMARY:

On August 14, 2009 at approximately 1:00 pm, I met with Dr. Paige Thompson at a home owned by her in [REDACTED]. The purpose of the meeting was to conduct and interview with her in regards to allegations of her having violated her accreditation standards by issuing Official Certificates without having inspected the animals in question.

I explained to Dr. Thompson that a complaint had been made that she had issued Official Health Certificates for horses and that it was alleged that she had failed to inspect the animals within 10 days prior to issuing these certificates. Dr. Thompson stated at that time that she knew who had made the complaint as a complaint was made to the Florida Business and Professional Regulation agency and that they had not found any violations on her. Dr. Thompson advised me at that time that she was currently in civil litigation with the parties complaining about her but did agree to answer any questions I had.

Dr. Thompson stated that she was in civil litigation with Dave and Allana Wiggin in regards to past veterinary bills and co-ownership of a horse called Only The Best Willdo. She stated that Wiggin had told several of her clients that she was going to "get" her (Thompson) veterinary license. Thompson stated that she and Wiggin jointly owned Only The Best Willdo and that Wiggin had tried to change ownership papers to list her husband as co-owner taking her (Thompson) off of the papers without her permission. Thompson stated that the horse was now in Oklahoma without the Courts permission and that a hearing was scheduled for later on this matter. She stated that she did win in Small Claims Court a judgment for her veterinary bills.

I reviewed the Health Certificates dated 11/01/05, 05/18/07 and 03/13/08 issued by Thompson with her and she stated that she did in fact inspect the horses involves within the 10 day requirement before issuing the Certificate. Thompson stated that she did refuse to issue one certificate until she received the EIA papers back. She stated she did issue the certificate after receiving negative EIA test results.

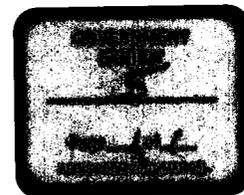
Thompson stated that she is aware of her responsibilities as a USDA Accredited Veterinarian and that to the best of her knowledge she has never issued a Certificate for an animal without having first inspected the animal within the time required.

Dr. Thompson declined to provide a written statement stating that she was currently being represented by an attorney in regards to the ongoing civil litigation involving Wiggin. Dr. Thompson provided me with information on contacting her attorney.

Dr. Thompson provided me with a copy of a Final Judgment against Dave Wiggin, a copies of several letters from her attorney to the Florida Business of Professional Regulation, and a copy of a letter from the Assistant General Counsel of the Business of Professional Regulation stating that the case was closed without a finding of probable cause.

Dr. Thompson and I then concluded the interview agreeing that I would contact her attorney for a written statement.

<p>NAME OF PERSON DOCUMENTING INTERVIEW: [REDACTED]</p>	<p>SIGNATURE: [REDACTED]</p>	<p>DATE: August 14, 2009</p>
---	--	--



IN THE COUNTY COURT, IN AND FOR
MARION COUNTY, FLORIDA

CASE NO. 42 2008 SC 3314

DR. PAIGE THOMPSON,
Plaintiff,

v

DAVE WIGGIN
Defendant.

FINAL JUDGMENT

This action was tried before the court. On the evidence presented:

IT IS ADJUDGED that plaintiff, Dr. Paige Thompson, 311 NE 45th Terrace, Ocala, FL 34470 shall recover from defendant, Dave Wiggin, 18101 Mason Smith Road, Brooksville, FL 34604 9028 the sum of \$379.00 as principal and the sum of \$570.00 for attorneys' fees, the sum of \$115.00 for costs, making a total of \$1064.00 that shall bear interest at the rate of 11% a year, for which let execution issue.

It is further ordered and adjudged that defendant shall complete under oath Florida Rule of Civil Procedure Form 1.977 (Fact Information Sheet), including all required attachments, and serve it on plaintiff's attorney within 45 days from the date of this final judgment, unless the final judgment is satisfied or post judgment discovery is stayed.

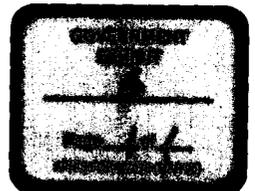
Jurisdiction of this case is retained by the Court in order to enter further orders that are proper to compel defendant to complete Florida Rule of Civil Procedure Form 1.977, including all required attachments and serve it on plaintiff's attorney.

ORDERED at Ocala, Marion County, Florida on the 05 day Sept., 2008
A.D.

JOHN E. FUTCH
JOHN E. FUTCH, County Court Judge

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished to **Irwin J. Weiner, Esquire**, Attorney for Plaintiff, 50 SE First Avenue, Ocala, FL 34471 and **Dave Wiggin**, Defendant, 18101 Mason Smith Road, PO BOX 10693, Brooksville, FL 34604 9028 this 05 day of Sept., 2008.

Judicial Assistant

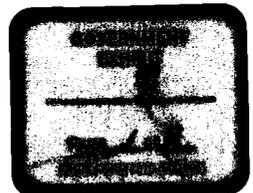


STATE OF FLORIDA
DEPARTMENT OF BUSINESS AND
PROFESSIONAL REGULATION

Please submit to appropriate address on Page 4

COMPLAINANT INFORMATION						
Last Name	Wiggin	First	Allana	Middle	Title	Suffix
Your Company/Occupation		Insurance Agent				
MAILING ADDRESS						
Street Address or P.O. Box		P.O. Box 12021				
City		State	Zip Code (+4 optional)			
Brooksville		FL	34603			
County (if Florida address)		Country				
Hernando		USA				
CONTACT INFORMATION						
Primary Phone Number		Primary E-Mail Address				
352-585-7467		MRSTYMEE @ AOL.COM				
Unlicensed Activity Complaint? Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/>						
COMPLAINT DESCRIPTION						
<p>Dr Paige Thompson has on several occasions provided me with Health Certificates without ever examining the horse for which the Health Certificate is for.</p>						

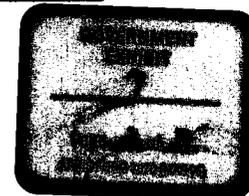
Attach additional sheets as necessary.



CONTACT PERSON (IF OTHER THAN YOURSELF)				
Last Name	First	Middle	Title	Suffix
Wiggin	DAVE			
ADDRESS				
Street Address or P.O. Box				
PO Box 10693				
City			State	Zip Code (+4 optional)
Brooksville			FL	34603
County (if Florida address)		Country		
Hernando		USA		
CONTACT INFORMATION				
Primary Phone Number		Primary E-Mail Address		
352-406-1193		MRSTYmee@AOL.com		

PRIVATE ATTORNEY FOR COMPLAINANT (IF APPLICABLE)				
Last Name	First	Middle	Title	Suffix
ADDRESS				
Street Address or P.O. Box				
City				
State				
Zip Code (+4 optional)				
County (if Florida address)			Country	
CONTACT INFORMATION				
Primary Phone Number		Alternate Phone Number		

SUBJECT OF COMPLAINT				
Last Name	First	Middle	Title	Suffix
Thompson	LISA	Prige		
License Number (if known)				
VM 6818				
Company/Occupation				
Veterinarian				
MAILING ADDRESS				
Street Address or P.O. Box				
311 NE 45 th Terr.				
City			State	Zip Code (+4 optional)
Ocala			FL	34470
County (if Florida address)		Country		
Marion		USA		
CONTACT INFORMATION				
Primary Phone Number		Primary E-Mail Address		
RESIDENCE ADDRESS (IF DIFFERENT THAN MAILING ADDRESS)				
Street Address				
SAME				
City			State	Zip Code (+4 optional)
County (if Florida address)			Country	



PRIVATE ATTORNEY FOR SUBJECT OF COMPLAINT (IF APPLICABLE)				
Last Name	First	Middle	Title	Suffix
ADDRESS				
Street Address or P.O. Box				
City		State	Zip Code (+4 optional)	
County (if Florida address)		Country		
CONTACT INFORMATION				
Primary Phone Number		Alternate Phone Number		

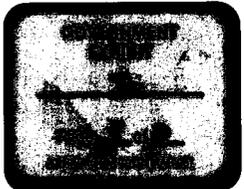
WITNESS (IF APPLICABLE)				
Last Name	First	Middle	Title	Suffix
ADDRESS				
Street Address or P.O. Box				
City		State	Zip Code (+4 optional)	
County (if Florida address)		Country		
CONTACT INFORMATION				
Primary Phone Number		Alternate Phone Number		

WITNESS (IF APPLICABLE)				
Last Name	First	Middle	Title	Suffix
ADDRESS				
Street Address or P.O. Box				
City		State	Zip Code (+4 optional)	
County (if Florida address)		Country		
CONTACT INFORMATION				
Primary Phone Number		Alternate Phone Number		

I affirm that I have provided the above information completely and truthfully to the best of my knowledge.

Complainant Sign Here: Allana Wiggler Date: 8/20/08

Witness Name: _____



Charles W. Drago, Secretary

Charlie Crist, Governor

IRWIN J. WEINER, Esq.
50 Southeast First Avenue
Ocala, FL 34471

RE: Lisa Paige Thompson, D.V.M.
Case No. 2008-050714

Dear Mr. Weiner,

Please be advised the above-referenced case has been reviewed by the Department and closed without a finding of probable cause to believe your client violated the provisions of chapter 474, Florida Statutes, and/or the rules promulgated pursuant thereto. The case has been closed without prejudice, if the Department receives additional evidence or determines, upon further review, that the determination to close was in error, the Department reserves the right to reopen the case. If the case is reopened, you will be promptly notified.

As this case has been dismissed without a finding of probable cause, the materials included within the file are confidential and may not be disclosed to the public without your written permission.

Please contact me if you have any questions.

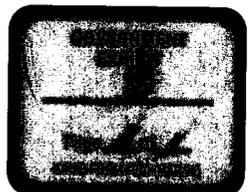
Sincerely,

(b)(6), (b)(7)c

EFD/jlm

3.9, 2009

THOMPSON, LISA PAIGE
D.V.M.
2008-050714



MEMORANDUM TO THE FILE

All redactions on this page are pursuant to (b)(6) & (b)(7)(c).

September 10, 2009

Re: FL08701-VS – Dr. Paige Thompson

On August 14, 2009, I had met with Dr. Paige Thompson in [REDACTED] and conducted an interview with her in regards to the allegations made by a client, Allana Wiggin. Dr. Thompson answered my questions but at the time, declined to provide a written statement stating that she would like to consult her attorney, Mr. Weiner. Dr. Thompson asked that I contact Mr. Weiner and discuss the allegations with him and have him determine whether she should sign a statement. I agreed to this and made several attempts to contact Mr. Weiner.

On September 9, 2009, at approximately 3:30 pm, Mr. Irwin Weiner, Attorney, representing Dr. Paige Thompson, returned my call in regards to a current investigation I have involving allegations that Dr. Thompson had violated her USDA Veterinary Accreditation Standards by having issued Certificates of Veterinary Inspection without having inspected the animals within 10 days prior to issuing the Certificates in question.

After explaining what I needed from Dr. Thompson in regards to a written statement, Mr. Weiner advised me that Dr. Thompson was still in litigation with Wiggin and at this time he did not want to have Dr. Thompson provide a written statement on the matter. Mr. Weiner did advise me that he would prepare a letter and submit to me in regards to the allegations against Dr. Thompson. Mr. Weiner advised that it would probably be next week before this could be done since he would be traveling out of town.

I agreed to this and the conversation was concluded.

[REDACTED]
Florida



Law Office
IRWIN J. WEINER
Attorney at Law

*121 N.W. Third Street
Ocala, Florida 34475*

Certified Circuit Court Mediator
Certified Federal Court Mediator

Telephone: (352) 732-7140
Facsimile: (352) 732-3540
weinerlaw@atlantic.net

CIVIL TRIAL ATTORNEY

All redactions on this page are pursuant to (b)(6) & (b)(7)(c).

September 14, 2009

[REDACTED]
United States Dept. of Agriculture
PO BOX 458
Branford, FL 32008

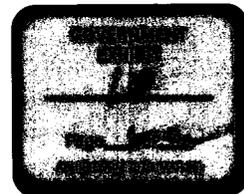
RE Lisa Paige Thompson, DVM
Your File No. FL 08701-VS

Dear [REDACTED]

This will confirm our recent telephone conversation wherein you advised that it would be sufficient for me to send you a letter setting forth the circumstances surrounding the Wiggins' complaint that was referred to you by the State of Florida, Dept. of Business and Professional Regulation.

Dr. Thompson advises me that approximately a week to ten days before she signed the health certificate in question, she saw both horses at the Wiggins' farm, that was located in Hernando County. Based upon her observation, both horses appeared to be in good health.

It was Dr. Thompson's understanding that the health certificate was not for purposes of the horses being immediately shipped out of the State. Mrs. Wiggin had requested the health certificate in order to obtain a passport so that at some later date the horses could be shipped. Dr. Thompson did not immediately issue the health certificate when she observed both horses because she did not have available to her at that time the results of current



Coggins tests for either horse. When Dr. Thompson obtained the results of the Coggins tests, which turned out to be current and negative, she then issued the health certificate.

Since passport that was ultimately issued as a result of the health certificate would have been valid for six months, without the necessity of any further health examinations, the delay between Dr. Thompson's examination of the horses and the issuance of the health certificate made no significant difference. This is not a case where the horses were being shipped simultaneously with the issuance of the health certificate.

Should you have any further questions, please feel free to call upon me.

Very truly yours,



IRWIN J. WEINER

IJW/sh

cc:

Client

C:\WPDocs\08129\ProfRay - Letter Response to Investigation 9-14-09.wpd





United States
Department of
Agriculture

Animal and Plant
Health Inspection
Service

P.O. Box 96464
Washington, DC
20090-6464

Paige Thompson, DVM


December 8, 1995

Dear Dr. Thompson:

I am pleased to inform you that, effective today, I have approved your application for veterinary accreditation. My decision was based on the recommendation of the State and Federal animal health officials in your State, who have determined that you meet all the requirements for accreditation.

Your expertise and competence in carrying out your new responsibilities as an accredited veterinarian directly relate to the integrity of our domestic agriculture industry and our ability to conduct foreign trade. As such, I trust that your performance as a representative of the Federal Government will be in accordance with the Standards for Accredited Veterinarians.

Your certificate of Veterinary Accreditation is forthcoming. I wish you well in your endeavors as an accredited veterinarian.

Sincerely,



Lonnie J. King
Administrator



APHIS - Protecting American Agriculture

An Equal Opportunity Employer



No accreditation may be granted unless a completed application form has been received (9 CFR 161).

See reverse side for additional OMB information.

FORM APPROVED
OMB NO. 0579-0032

U.S. DEPARTMENT OF AGRICULTURE
ANIMAL AND PLANT HEALTH INSPECTION SERVICE
VETERINARY SERVICES

APPLICATION FOR VETERINARY ACCREDITATION

1. NAME OF VETERINARIAN (as used professionally, including degree) Paige Thompson DVM.		2. SOCIAL SECURITY NUMBER [REDACTED]	
3. SCHOOL/COLLEGE GRADUATED			
3A. NAME University of Florida College of Vet. Med.	3B. CODE 105	3C. YEAR GRADUATED [REDACTED]	
4. INITIAL ORIENTATION COMPLETED			
4A. DATE May 13, 1995		4B. STATE Florida	
5. BUSINESS ADDRESS Belleview Veterinary Hospital 10725 S.E. 36th Ave Belleview, Fla. 34420		6. MAILING ADDRESS (if different from Number 5) [REDACTED]	
7. OFFICE TELEPHONE NUMBER (904) 347-3900	8. HOME TELEPHONE NUMBER [REDACTED]	9. NAME OF COUNTY WHERE PRACTICE IS LOCATED (County Code to be entered by Veterinary Services)	
10. TYPE OF PRACTICE Mixed 50/50	CODE 1018	11. LICENSED TO PRACTICE VETERINARY MEDICINE IN THE FOLLOWING STATE(S) (Give State and License Number - Example: TX-00000) Fla - VM - 0006818	

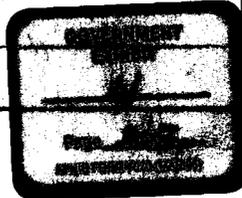
TASKS FOR ACCREDITED VETERINARIANS

1. Perform physical examinations of individual animals and visually inspect herds or flocks.
2. Recognize the common breeds of livestock.
3. Recognize brucellosis tattoos and calfhood vaccination tags, and determine the state of origin of eartags.
4. Estimate the age of livestock using a dental formula.
5. Apply an eartag, tattoo, backtag, and legband.
6. Certify the disease status of a flock for shipment of birds.
7. Properly complete certificates for domestic and international movement of animals.
8. Apply and remove official seals.
9. Perform a necropsy on livestock.
10. Recognize signs and lesions of exotic animal diseases.
11. Plan a disease control strategy for a livestock unit.
12. Vaccinate for brucellosis and fill out the vaccination certificate.
13. Draw and ship blood for testing.
14. Perform a caudal fold test for tuberculosis.
15. Develop cleaning and disinfection plans to control communicable livestock disease spread.
16. Explain basic principles for control of diseases for which APHIS or APHIS-State cooperative programs exist, such as brucellosis, pseudorabies, and tuberculosis.

CERTIFICATION

I certify that I am able to perform the tasks listed above and have been given a copy of the Standards for Accredited Veterinarian Duties. I agree to conduct all activities as an accredited veterinarian in accordance with the Standards for Accredited Veterinarian Duties contained in Title 9, Code of Federal Regulations, Subchapter J, Part 161.3, and any amendments thereto which may subsequently be issued and in accordance with instructions received from the Veterinarian-in-Charge.

12. SIGNATURE OF VETERINARIAN Paige Thompson		13. DATE May 13, 1995
Signatures of the Veterinarian-in-Charge and the State Animal Health Official appearing below denote endorsement of the applicant for veterinary accreditation.		
14. SIGNATURE [REDACTED]	15. DATE 11-28-95	17. DATE
16. SIGNATURE [REDACTED]	[REDACTED]	



WEINER & ARGO, P.A.

Attorneys at Law
50 Southeast First Avenue
Ocala, Florida 34471

Irwin J. Weiner
(352) 732-7140
(352) 732-9129
Certified Circuit Court Mediator
I.J.Weiner@weinerargolaw.com

Fax: (352) 732-3540
GENERAL EMAIL: WEGO1@MINDSPRING.COM
www.weinerargolaw.com

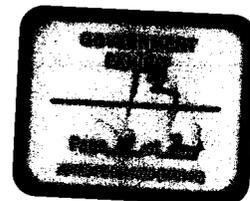
B. Wayne Argo
(352) 732-8895
(352) 732-8896
Certified Circuit Court Mediator
Bwargo@weinerargolaw.com

September 25, 2008

[REDACTED]
Dept. of Business & Professional Reg.
Regional Office IV
240 NW 76th Drive, Ste A
Gainesville, FL 32607 6635

RE: Case No. 2008 050 714
Lisa Paige Thompson, DVM
Our File No. 08 129 IJW

Dear [REDACTED]



This letter will constitute a written response on behalf of Dr. Lisa Paige Thompson to the complaint filed by Allana Wiggin and David Wiggin. The Wiggins' complaint is nothing more than a spite reaction to pending litigation between them and Dr. Thompson.

On June 9, 2008, Dr. Thompson filed a lawsuit against Allana Wiggin to obtain a judicial determination that Dr. Thompson is the owner of an undivided one half interest in a Quarter Horse colt known as Only The Best Willdo and seeking a temporary injunction requiring that the colt be returned to Marion County, Florida. A copy of the original complaint is attached hereto.

While the original complaint was pending, Dr. Thompson found out that Mrs. Wiggin filed a change of ownership form with the American Quarter Horse Association attempting to transfer ownership of the colt to her husband, David Wiggin. Mrs. Wiggin did this five days after being served with the original complaint. When later deposed about this attempted transfer, the only reason Mrs. Wiggin gave for doing so was "upon advice of counsel."

After learning of the attempted transfer, Dr. Thompson placed the American Quarter Horse Association on notice of the pending litigation, and as a result, the American Quarter Horse Association "red flagged" the file, and pending resolution of the litigation any further action with regard to the registration of the colt has been suspended. In addition, Dr. Thompson filed an amended complaint, naming David Wiggin as an additional party defendant. A copy of the amended complaint is attached.

On June 17, 2008 Dr. Thompson instituted a small claims action against David Wiggin for unpaid veterinarian bills in the amount of \$379. Mr. Wiggin contested this claim and a trial ensued, resulting in a final judgment being entered against Mr. Wiggin for the \$379 in unpaid fees plus attorney's fees and court costs, making a total judgment of \$1064. A copy is enclosed. The small

claims trial that resulted in turning the \$379 claim into a \$1064 judgment occurred on August 15, 2008. Mr. and Mrs. Wiggin's complaint to the Department was made five days later.

To add fuel to the fire, a third litigation was of a small claims action filed by David Wiggin in the Hernando County Small Claims Court alleging Dr. Thompson owed him for unpaid farrier bills. That case was dismissed by the trial judge at pretrial conference.

During the pendency of these lawsuits, both the Wiggins commented to a number of people that they were going to "get even" with Dr. Thompson and would "get her license."

A copy of Dr. Thompson's CV is attached.

Very truly yours,

IRWIN J. WEINER

IJW/sh

HA08129\CORR\BPR - Repsonse ltr 9-24-08.wpd

THOMPSON

HO



WEINER & ARGO, P.A.

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B. Wayne Argo
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(352) 732-8896
Certified Circuit Court Mediator
Bwargo@weinerargolaw.com

October 20, 2008

[REDACTED]
Dept. of Business & Professional Reg.
Regional Office IV
240 NW 76th Drive, Ste A
Gainesville, FL 32607 6635

RE: Case No. 2008 050 714
Lisa Paige Thompson, DVM
Our File No. 08 129 IJW

Dear [REDACTED]

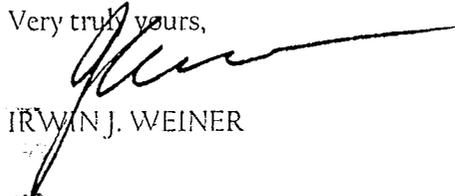
Pursuant to our recent telephone conversation with regard to the above captioned matter, I am setting forth herein my understanding of the circumstances surrounding the Wiggins' complaint.

Approximately a week to ten days before Dr. Thompson signed the health certificate in question, Dr. Thompson saw both horses at the Wiggins' farm in Hernando County. Based upon her observation, both horses appeared to be in good health.

The purpose of the health certificate was for Mrs. Wiggin to obtain a passport so that the horses could be shipped out of State. Dr. Thompson did not immediately issue the health certificate because she did not have available to her at the time she was at the Wiggins' farm the results of current Coggins test for either horse. Dr. Thompson then proceeded to obtain the results of the Coggins tests and since they were current and negative, then issued the health certificate.

Although there was a slight delay between Dr. Thompson's examination of the horses and the issuance of the health certificate, this did not make a significant difference since the passport that was issued would have been good for six months, without the necessity of any further health examinations. Therefore a health certificate simultaneously with shipment of the horses was not required.

Very truly yours,


IRWIN J. WEINER

IJW/sh

CC: [REDACTED]
client

