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13 **Pro Hac Vice* application to be submitted
14 *Counsel for Plaintiffs and the Proposed Class*

15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 MICHAEL E. BEYCHOK, JUSTIN
18 WUNDERLER, MICHAEL
19 MEEGAN, and KEITH MAUER,
20 individually and on behalf of all others
similarly situated,

21 Plaintiffs,

22 vs.

24 ROBERT A. BAFFERT, BOB
25 BAFFERT RACING STABLES,
26 INC., and ZEDAN RACING
STABLES, INC.,

27 Defendants.
28

Case No.:

CLASS ACTION COMPLAINT

JURY TRIAL DEMANDED

1 Plaintiffs Michael E. Beychok, Justin Wunderler, Michael Meegan, and
2 Keith Mauer, on behalf of themselves and all other similarly situated individuals,
3 and through their undersigned counsel, bring this Class Action Lawsuit (the
4 “Complaint”) against Defendants Robert A. Baffert, Bob Baffert Racing Stables,
5 Inc. (collectively, “Baffert” or the “Baffert Defendants”), and Zedan Racing
6 Stables, Inc. (“Zedan Racing”) (collectively “Defendants”) and, based upon
7 personal knowledge and the investigation of counsel, allege as follows:

8 **NATURE OF THE ACTION**

9 1. Plaintiffs bring this Complaint on behalf of themselves and the
10 “Class” (defined below) against Defendant Baffert for violations of (i) the
11 federal Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1962(c)-
12 (d) (“RICO”); and (ii) the California Control of Profits of Organized Crime Act,
13 Cal. Penal Code § 186 (“CCPOCA”); and against Defendants Baffert and Zedan
14 Racing for state common law and equitable fraud.

15 2. Specifically, as detailed more fully herein, Baffert participated in
16 the operation of the affairs of one or more “association-in-fact” enterprises,
17 described more fully below, and conspired to do so, through a RICO pattern of
18 racketeering activity.

19 3. As described herein, Baffert’s multiple and repeated acts of doping
20 and entering horses into thoroughbred races, including the Kentucky Derby,
21 constituted racketeering activity as defined in 18 U.S.C. § 1961(1)(A), 18 U.S.C.
22 § 1961(1)(B), and Cal. Penal Code § 186 in that he (1) engaged in illegal gambling,
23 which is chargeable under Cal. Penal Code § 186(a)(8); and (2) violated U.S.C. §
24 1952(a)(3) by traveling in interstate commerce and using a facility in interstate and
25 foreign commerce – that is, the simulcast broadcasting by wire and television of
26 the Kentucky Derby and other races – to promote, manage, establish, carry on, or
27 facilitate the promotion, management, establishment, or carrying on of any
28

1 unlawful activity, including in violation of the laws of California, by engaging in
2 illegal gambling chargeable under Cal. Penal Code § 186(a)(8).

3 4. Specifically, Baffert's multiple and repeated acts of illegally doping
4 and entering horses into thoroughbred races in the State of California and
5 elsewhere constituted a pattern of racketeering activity within the meaning of 18
6 U.S.C. § 1961(5) and Cal. Penal Code § 186 as he has committed at least two
7 incidents of criminal profiteering within a ten-year period which are related and,
8 as a result of his continued involvement in thoroughbred racing, pose a threat of
9 continuing criminal activity extending indefinitely into the future.

10 5. Plaintiffs' claims also involve conspiracies between Baffert and
11 other owners and or trainers to commit the above-described acts to engage in
12 illegal gambling and/or horse doping through a pattern of racketeering activity.

13 6. For example, on May 1, 2021, Defendants entered a doped horse,
14 Medina Spirit, into the 147th running of The Kentucky Derby at Churchill Downs
15 in Louisville, Kentucky and won \$1,860,000.00 as part of a horse-doping scheme
16 in thoroughbred racing.

17 7. The Baffert Defendants' unlawful conduct directly injured Plaintiffs
18 in their business and property. Specifically, on May 1, 2021, Plaintiffs bet upon
19 the horse that finished in second place behind the drugged horse, Medina Spirit,
20 at the Kentucky Derby at Churchill Downs on May 1, 2021.

21 8. Plaintiff, Michael E. Beychok's ("Plaintiff Beychok"), betting tickets
22 cost \$966.00, and would have provided a minimum potential payoff of at least
23 \$10,000.00 - \$100,000.00. Plaintiff Beychok's wagers would have won, but for
24 the illegal, drug-induced win by Medina Spirit. Thus, Plaintiff Beychok is
25 entitled to bring a civil action against Defendants.

26 9. Plaintiff Justin Wunderler's ("Plaintiff Wunderler") betting tickets
27 cost roughly \$2,000.00 and would have provided a minimum potential payoff of at
28 least \$40,000. Plaintiff Wunderler's wagers would have won, but for the illegal,

1 drug-induced win by Medina Spirit. Thus, Plaintiff Wunderler is entitled to bring
2 a civil action against Defendants.

3 10. Plaintiff Michael Meegan’s (“Plaintiff Meegan”) betting tickets cost
4 roughly \$140.00 and would have provided a minimum potential payoff of at least
5 \$4,000. Plaintiff Meegan’s wagers would have won, but for the illegal, drug-
6 induced win by Medina Spirit. Thus, Plaintiff Meegan is entitled to bring a civil
7 action against Defendants.

8 11. Plaintiff Keith Mauer’s (“Plaintiff Mauer”) betting tickets cost
9 roughly \$5 and would have provided a minimum potential payoff in excess of
10 \$100. Plaintiff Mauer’s wagers would have won, but for the illegal, drug-induced
11 win by Medina Spirit. Thus, Plaintiff Mauer is entitled to bring a civil action
12 against Defendants.

13 12. The Baffert Defendants and Defendant Zedan Racing further engaged
14 in common law and equitable fraud in that Defendants misrepresented to bettors
15 that they (1) entered a horse that complied with the race track rules; (2) that the
16 misrepresentation was material because pari-mutuel wagering cannot function
17 without fairness and administering a banned substance to a horse is antithetical to
18 the spirit of fair competition; (3) Defendants knew or believed that their
19 representation was false; (4) Defendants intended that bettors such as Plaintiffs
20 would rely on their misrepresentation to induce them to make wagers, as a track’s
21 purse structure comes directly from the total amount that is bet by the public; (5)
22 Plaintiffs and the Class relied on these misrepresentations; and (6) Plaintiffs and
23 the Class were damaged by Defendants’ misrepresentations through the loss of
24 their bets and winnings.

25 **PARTIES AND OTHER PARTICIPANTS**

26 13. Plaintiff Michael Beychok resides in Baton Rouge, Louisiana and is a
27 part-time, pari-mutuel thoroughbred racing bettor.

28 //

1 14. Plaintiff Justin Wunderler resides in Waretown, New Jersey and is a
2 part-time, pari-mutuel thoroughbred racing bettor.

3 15. Plaintiff Michael Meegan resides in New York City, New York and
4 is a part-time, pari-mutuel thoroughbred racing bettor.

5 16. Plaintiff Keith Mauer resides in Roseville, California and is a part-
6 time, pari-mutuel thoroughbred racing bettor.

7 17. Upon information and belief, Defendant Robert A. Baffert resides and
8 conducts much of his business, Defendant Bob Baffert Racing Stables, Inc., in or
9 around Los Angeles County, California and is a licensed horse trainer of horses,
10 including Medina Spirit, and was the trainer of Medina Spirit during the race in
11 question.

12 18. Defendant Zedan Racing Stables, Inc. is based in Lexington,
13 Kentucky, with its racing operations based in Los Angeles, California. Zedan
14 Racing was the owner of Medina Spirit during the race in question.

15 **JURISDICTION AND VENUE**

16 19. Plaintiffs, individually and on behalf of the Class, assert claims
17 against Defendants Robert Baffert and Bob Baffert Racing Stables, Inc. that are
18 founded upon federal questions subject matter jurisdiction under 28 U.S.C. § 1331,
19 in regard to the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. §
20 1962 (“RICO”).

21 20. Venue for the Civil RICO claims is appropriate in this Court because
22 Defendants Robert Baffert and Bob Baffert Racing Stables, Inc. reside and transact
23 their affairs and conduct business in the State of California and, specifically,
24 through this District.

25 21. Plaintiffs, individually and on behalf of the Class, also assert
26 common law fraud and equitable fraud claims against all Defendants. As set forth
27 above, 28 U.S.C. § 1331 vests this Court with original subject matter jurisdiction.
28 Venue is also proper for these claims in this Court because Defendants reside and

1 transact their affairs and conduct business in the State of California and,
2 specifically, through this District.

3 22. This Court also has diversity jurisdiction over this action under the
4 Class Action Fairness Act, 28 U.S.C. § 1332(d) because this is a class action
5 involving more than 100 class members, the amount in controversy exceeds \$5
6 million, exclusive of interest and costs, and Plaintiffs and Class Members are
7 citizens of states that differ from Defendants.

8 **FACTS**

9 **I. THE WORLD OF PARI-MUTUEL BETTING AND**
10 **THOROUGHBRED RACING**

11 23. Pari-mutuel betting is a system used in gambling on events, like
12 thoroughbred racing, in which participants finish in a ranked order. All bets of a
13 particular type are placed together in a pool and payoff odds are calculated by
14 sharing the pool among all winning bets after taxes and the “house-take” are
15 removed. The payoff is determined by the pool size minus the “take,” and then
16 divided by the number of winning tickets.

17 24. Transmitting, re-transmitting, receiving, and rebroadcasting
18 thoroughbred racing occurring live at an in-state location to one or more out-of-
19 state locations by television or radio, through satellite or other electrical or
20 electronic means, or receiving at an in-state location events which occur live at an
21 out-of-state location, known as simulcasting, allows bettors to place wagers
22 without being physically present at the facilities where the race is occurring live.
23 Race simulcasting also involves transmitting pari-mutuel wagering information to
24 a central website, so that all bettors, even those in different locations, may
25 participate in the same betting pool.

26 25. Live thoroughbred races occur at various venues within the United
27 States of America, including at Churchill Downs, one of the world’s most
28 prestigious and legendary racetracks. Churchill Downs is located in Louisville,

1 Kentucky. The Kentucky Derby is simulcast to other various locations via
2 television and through internet betting sites such as TwinSpires.com and other
3 wagering companies based in California and other states.

4 26. Bettors and members of the public expect that horses will give their
5 best effort in every race and that all horses entered in every race will not be racing
6 under the influence of a drug or foreign substance that has been administered
7 in violation of racing rules and regulations.

8 27. Individuals who are trainers of thoroughbred racing horses in the
9 State of California are required to be licensed under and follow California State
10 laws, rules, and regulations.

11 28. Furthermore, all competitors at Churchill Downs must comply with
12 Churchill Downs racetrack rules and regulations (the “Racetrack Rules”). The
13 Racetrack Rules are strictly against the entry or participation of a horse in any race
14 while carrying drugs or other banned substances in its body. By entering to
15 compete, the applicants represent that they have abided by the Racetrack Rules.

16 29. Bettors, including Plaintiffs and Class Members, rely on participants’
17 representation that they comport with these laws, regulations, and rules in order
18 to properly determine which horses to bet on.

19 30. Defendants and other owners and trainers intend that bettors rely on
20 these representations in order to encourage wagering in racing, thereby
21 increasing the purse total.

22 **II. DEFENDANTS VIOLATED THE APPLICABLE CALIFORNIA**
23 **LAW AND RACING RULES, RESULTING IN PLAINTIFFS’ AND**
24 **CLASS MEMBERS’ DAMAGES**

25 31. Plaintiffs make an effort to conduct in-depth research prior to
26 selecting horses upon which to place their bets. This research is based upon
27 public information provided to them, some of which is provided by trainers such as
28

1 the Baffert Defendants,¹ and upon the understanding that horse doping is banned
2 in the sport of thoroughbred racing. For this reason, Defendants'
3 misrepresentation that they were in compliance with laws, regulations, and
4 Racetrack Rules on race day are material.

5 32. On May 1, 2021, Plaintiffs placed their bets for the 147th running of
6 the Kentucky Derby at Churchill Downs based upon their research and upon
7 Defendants' material misrepresentation that they were in compliance with the laws,
8 regulations, and Racetrack Rules governing the Kentucky Derby.

9 33. Medina Spirit won the race, contrary to what Plaintiffs' analysis and
10 observations of the horse's previous racing form and analysis of the race
11 suggested would be the result. Consequently, the other horses on which Plaintiffs
12 placed their bets finished second, third, fourth, and fifth, instead of first, second,
13 third, and fourth.

14 34. Following Medina Spirit's victory on May 1, testing from post-race
15 blood samples revealed that Medina Spirit had been doped with a performance-
16 enhancing substance, betamethasone, indicating a violation of the Commonwealth
17 of Kentucky's equine medication protocols. As a result, Baffert was suspended
18 indefinitely by Churchill Downs, however, Plaintiffs' pari-mutuel wagers were
19 not altered. Further, assuming Medina Spirit is eventually disqualified by the
20 Churchill Downs Stewards and placed last, the prize money for the race will be
21 redistributed with the 2nd place finisher receiving the 1st place prize money, the 3rd
22 place finisher receiving the 2nd place prize money, etc., However, the bettors of the
23 race, including Plaintiffs, will not receive the payoffs they would have been
24 entitled to, but for the illegal participation of Medina Spirit.

25
26
27 ¹ This public information includes, but is not limited to, press conferences,
28 interviews, the recording and dissemination of workouts, and reports on the
general condition of the horse.

1 35. Upon information and belief, all Defendants knew or should have
2 known that betamethasone had been administered to Medina Spirit since the
3 horse was stabled at Zedan Racing and was under Defendants’ control, and since
4 Defendant Robert Baffert himself admitted that Medina Spirit’s positive test “may
5 have been the result of exposure from an ointment that was applied to the colt for
6 dermatitis.”²

7 36. While betamethasone is a Class C drug that is allowed in Kentucky as
8 a therapeutic, state rules require at least a 14-day withdrawal time before racing,
9 and any level of detection on race day is a violation.³

10 37. If Medina Spirit had been properly prohibited from competing as a
11 result of the failure to meet this 14-day withdrawal requirement, Plaintiffs and
12 Class Members would have won for the following types of bets: (1) win (bettor
13 picks the horse that wins); (2) place (bettor picks the horse that finishes either
14 first or second); (3) show (bettor picks the horse that finishes first, second, or
15 third); (4) exacta (bettor picks the two horses that finish first and second, in the
16 exact order); (5) trifecta (bettor picks the three horses that finish first, second, and
17 third, in the exact order); (6) superfecta (bettor picks the four horses that finish
18 first, second, third, and fourth, in the exact order); (7) pick-3, pick-4, or pick-5
19 wagers; and (8) pick-6 pools (bettors who correctly selected Mandaloun, the 28-1
20 long shot who, following Medina Spirit’s disqualification, would be the Derby
21 winner in their pick-6 wagers).

22 38. But for the illegal entrance of Medina Spirit into the race, Plaintiff
23 Beychok would not have lost the \$966.00 invested in the race and would have
24 instead won in excess of \$10,000.00.

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26
27 ² See [https://www.bloodhorse.com/horse-racing/articles/250061/baffert-ointment-](https://www.bloodhorse.com/horse-racing/articles/250061/baffert-ointment-could-have-caused-derby-drug-positive)
28 [could-have-caused-derby-drug-positive](https://www.bloodhorse.com/horse-racing/articles/250061/baffert-ointment-could-have-caused-derby-drug-positive) (last accessed May 11, 2021).

³ *Id.*

1 39. But for the illegal entrance of Medina Spirit into the race, Plaintiff
2 Wunderler would not have lost the roughly \$2,000 invested in the race and would
3 have instead won in excess of \$10,000.00.

4 40. But for the illegal entrance of Medina Spirit into the race, Plaintiff
5 Meegan would not have lost \$140 invested in the race and would have instead won
6 in excess of \$4,000.00.

7 41. But for the illegal entrance of Medina Spirit into the race, Plaintiff
8 Mauer would not have lost the \$5 invested in the race and would have instead won
9 in excess of \$100.

10 **III. THE RICO ENTERPRISES**

11 **A. The Bob Baffert and Bob Baffert Racing Stables, Inc.** 12 **Enterprises**

13 42. Defendant Bob Baffert Racing Stables, Inc. is an “enterprise”
14 within the meaning of 18 U.S.C. 1961(4).

15 43. Defendant Robert Baffert, as an individual, is also an
16 “enterprise” within the meaning of 18 U.S.C. 1961(4).

17 44. At all relevant times, the Baffert Defendants have been, and
18 continue to be, engaged in activities affecting interstate commerce, namely,
19 through training horses racing at various tracks around the country, through
20 entering horses into competition in various states, including racetracks in
21 California and Kentucky, through race simulcasting and the rebroadcasting by
22 television or radio of thoroughbred races occurring live at Churchill Downs
23 and other racetracks to one or more out-of-state locations, and through
24 advertisement of their activities via the Bob Baffert Racing Stables, Inc. website.⁴

25 45. As part of their business model, the Baffert Defendants train horses
26 owned by other parties, such as Zedan Racing, in order to obtain a portion of the
27 profits from horse winnings, including casino revenues when applicable. To
28

⁴ See <http://www.bobbaffert.com/> (last accessed May 11, 2021).

1 accomplish this purpose, the Baffert Defendants have been known to have used
2 betamethasone and other similar performance-enhancing drugs to enhance the
3 performance of their trained horses and alter the results of publicly held horse
4 racing contests in their trained horses' favor.

5 46. Upon information and belief, Bob Baffert Racing Stables, Inc. has
6 operated as a continuing unit for many years, demonstrating sufficient longevity
7 to permit those associated with the enterprise to pursue the enterprise's
8 purpose. The Baffert Defendants have continued in operation, despite several
9 doping violations.

10 47. As owner of Bob Baffert Racing Stables, Inc. and trainer, Defendant
11 Robert Baffert profits by the performance of any horse he enters in a race that
12 finishes in first, second, third place, or any place that pays in that particular race.

13 **B. The Zedan Racing Stables, Inc. Enterprise**

14 48. Defendant Zedan Racing Stables, Inc. is an "enterprise" within the
15 meaning of 18 U.S.C. § 1961(4).

16 49. Upon information and belief, Defendant Zedan Racing is the owner
17 of several thoroughbreds trained by Baffert, including Medina Spirit. As owner
18 of the thoroughbreds, Zedan Racing conducts, manages, and controls the affairs of
19 the enterprise.

20 50. Zedan Racing has been and continues to be engaged in activities
21 affecting interstate commerce, namely, racing at various tracks around the
22 country, through entering horses into competition in various states, including
23 racetracks in California and Kentucky, and through race simulcasting and the
24 rebroadcasting by television or radio of thoroughbred races occurring live at
25 Churchill Downs and other racetracks to one or more out-of-state locations.

26 51. As the owner of the horses, including Medina Spirit, Zedan Racing
27 profits by the performance of any Zedan Racing horse that is entered in a race and
28 finishes in first, second, third place, or any place that pays in that particular race.

1 **C. The Zedan-Baffert Enterprise**

2 52. At all relevant times, there has been and continues to be an
3 “association-in-fact” enterprise within the meaning of 18 U.S.C. § 1961(4)
4 consisting of Defendant Zedan Racing Stables, Inc., Defendant Robert Baffert, and
5 Defendant Bob Baffert Racing Stables, Inc. (the “Zedan-Baffert Enterprise”).

6 53. Zedan Racing, at all times material hereto, served as the owner of the
7 horses. Defendants Robert Baffert and Baffert Racing Stables, Inc., at all times
8 material hereto, trained the horses.

9 54. At all relevant times, the Zedan-Baffert Enterprise has been, and
10 continues to be engaged in activities affecting interstate commerce, namely,
11 racing at various tracks around the country and through entering horses into
12 competition in various states, including racetracks in California and Kentucky,
13 through race simulcasting and the rebroadcasting by television or radio of
14 thoroughbred races occurring live at Churchill Downs and other racetracks.

15 55. The Zedan-Baffert Enterprise is separate and distinct from the
16 members themselves.

17 56. Defendants Baffert and Zedan Racing are each associated together
18 for the common purpose of raising, training, and racing horses in order to win
19 thoroughbred races, like the Kentucky Derby at issue here.

20 57. The Zedan-Baffert Enterprise has operated as a continuing unit
21 since at least early 2020 and continues, to this day, demonstrating longevity to
22 permit those associated with the enterprise to pursue the enterprise’s purpose,
23 as the partnership is ongoing and has continued, despite Baffert’s past of horse-
24 doping violations.

25 58. Each member of the Zedan-Baffert Enterprise performs a role in the
26 group consistent with its organizational structure. For example, Zedan Racing
27 conducts the affairs of the Zedan-Baffert enterprise by purchasing thoroughbred
28 race horses at auction or through other means and placing them in the care of

1 Baffert Racing Stables, Inc., while Baffert manages and controls the training of
2 Zedan Racing's horses.

3 **IV. BAFFERT'S PATTERN OF RACKETEERING ACTIVITY**

4 **A. Federal Statutory Violations**

5 59. The Baffert Defendants' multiple and repeated acts of doping horses
6 competing in thoroughbred races in the states across the country, as more fully set
7 forth on the attached **Exhibit 1**, constitute a pattern of racketeering activity as
8 defined in 18 U.S.C. § 1961(i), (1)(A), and (1)(B).

9 60. The racketeering activity includes violations of the Travel Act, 18
10 U.S.C. § 1952(a)(3), through horse doping in pari-mutuel sports betting.
11 Defendants have traveled and used a facility in interstate and foreign commerce –
12 that is, the simulcast broadcasting by wire and television of races at Churchill
13 Downs and other racetracks – to promote, manage, establish, carry on, or
14 facilitate the promotion, management, establishment, or carrying on of any
15 unlawful activity, including in violation of the laws of California, by engaging in
16 illegal gambling chargeable under Cal. Penal Code § 186(a)(8).

17 **B. Relatedness**

18 61. The Baffert Defendants' acts are not isolated events; rather they
19 are a pattern of events related to each other in that they have similar purposes,
20 participants, methods of commission, and other distinguishing characteristics.
21 Relatedness is also established by the fact that all acts were done for the purpose
22 of winning thoroughbred races, including but not limited to the Kentucky Derby.

23 62. For example, in January 2021, the California Horse Racing Board
24 voted to let eventual 2018 Triple Crown winner and Baffert-trained horse, Justify,
25 keep his Santa Anita Derby victory, *despite the detection of scopolamine in*
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1 *postrace samples Justify*. The positive tests were revealed in a New York Times
2 story in September 2019.⁵

3 63. On October 20, 2020, a Baffert-trained horse was disqualified from
4 third to last in the Kentucky Oaks, which was held on September 4, 2020, after
5 testing positive with *twenty-seven (27) picograms of betamethasone*. Baffert did
6 not appeal and was fined \$1,500.⁶

7 64. On July 25, 2020, another Baffert-trained horse finished second in a
8 race at Del Mar in California *then tested positive after the race for the medication,*
9 *dextromethorphan*. Baffert was fined \$2,500 for the violation on November 30,
10 2020.⁷

11 65. In May 2020, two Baffert-trained horses tested positive for the
12 painkiller lidocaine after victories at Oaklawn Park. Tests revealed 185 picograms
13 in one horse, and 46 in the other. Arkansas stewards initially fined and suspended
14 Baffert fifteen (15) days for the violation. His appeal was heard, and the
15 suspension was lifted, with fines reduced to \$5,000 per horse.⁸

16 66. On August 3, 2019, a Baffert-trained horse that finished fourth in a
17 race at Del Mar tested positive for phenylbutazone. Baffert was fined \$1,500 for
18 violation of the California Horse Racing Board rules. Baffert had been fined
19 \$5,000 just a week earlier for the same violation with another horse.

20 67. These and many other confirmed acts of horse doping by the Baffert
21 Defendants in recent years and throughout his career were attempts to further
22 their goal of collecting the winning purse from the events in which their trained
23 horses compete. Although continually fined by stewards for medication violations,
24
25

26 ⁵ See <https://apnews.com/article/ky-state-wire-bob-baffert-sports-360b419b7f6fde781c78899976e2be7c> (last accessed May 11, 2020).

27 ⁶ *Id.*

28 ⁷ *Id.*

⁸ *Id.*

1 the violations have continued, finally leading to a violation in the most important
2 horse race in America, the 147th running of the Kentucky Derby.

3 68. Moreover, in a further pattern of deceit, Defendant Robert Baffert
4 released the following statement to the press on November 4, 2020, just two days
5 before one of the biggest racing events of the year, the Breeder's Cup:

6 "2020 has been a difficult year for everyone. It has been no
7 exception for my family, my barn, and me. I am very aware of the
8 several incidents this year concerning my horses and the impact it
9 has had on my family, horse racing, and me. I want to have a
10 positive influence on the sport of horse racing. Horses have been my
11 life and I owe everything to them and the tremendous sport in which
12 I have been so fortunate to be involved. We can always do better and
13 that is my goal. Given what has transpired this year, I intend to do
14 everything possible to ensure I receive no further medication
15 complaints. As such, I want to announce that, beginning
16 immediately, I plan to implement the following procedures in an
17 effort to make my barn one of the leaders in best practices and rule
18 compliance:

- 19 1. I am retaining Dr. Michael Hore of the Hagyard Equine Medical
20 Institute to add an additional layer of protection to ensure the well-
21 being of horses in my care and rule compliance.
- 22 2. I am increasing the training and awareness of all my employees
23 when it comes to proper protocols.
- 24 3. I am personally increasing my oversight and commitment to
25 running a tight ship and being careful that protective measures are in
26 place.

27 I want to raise the bar and set the standard for equine safety and rule
28 compliance going forward. For those of you that have been upset
over the incidents of this past year, I share in your disappointment. I
humbly vow to do everything within my power to do better. I want
my legacy to be one of making every effort to do right by the horse
and the sport."⁹

⁹ See [Baffert Issues Statement on Medication Issues \(thoroughbreddailynews.com\)](https://www.thoroughbreddailynews.com)
(last accessed May 13, 2021).

1 69. Bettors were asked to assume that the Baffert Defendants had cleaned
2 up their act and would be taking every step possible to ensure the horses in their
3 care would no longer be administered illegal drugs prior to racing. Bettors,
4 including Plaintiffs and the Class, relied on these assurances from the Baffert
5 Defendants.

6 70. On May 12, 2021, Defendant Robert Baffert’s attorney, Craig
7 Robertson, stated the following on the previously represented hiring of Dr. Michael
8 Hore:

9 “There were initial discussions and plan to begin the process of
10 it materializing ... They did not materialize as expected due to
11 COVID, but I’ve had conversations with Dr. Hore the last
12 couple days about that very subject and discussing about
getting that back on track.”¹⁰

13 71. Thus, once again, bettors (including Plaintiffs and the Class) were
14 misled to place wagers under misleading circumstances, as the Baffert Defendants
15 knowingly provided false information to the public and manipulated the media in
16 order to enhance their reputation. This misrepresentation comes at the detriment of
17 the bettors who rely on public information when betting on races, as discussed
18 *supra*.

19 **C. Continuity**

20 72. The Baffert Defendants’ related pattern of racketeering acts and other
21 violations have extended as far back as at least 1993, and have continued through
22 the present, as shown in **Exhibit 1** and further highlighted in Section IV(b) above.

23 73. Their excuses for the doping violations he has committed over the
24 years have included the following:

- 25 a. A bagel containing poppy seeds may have been placed in Defendant
26 Robert Baffert’s barn;

27 _____
28 ¹⁰ [Hore's Advisory Role for Baffert Did Not Materialize - BloodHorse](#) (last
accessed May 13, 2021).

- 1 b. an employee wearing a “Salonpas” pain relief patch on his back may
- 2 have transferred lidocaine from the patch to the horses when the
- 3 employee applied their tongue ties; and
- 4 c. a groom, who had been taking cough syrup, peed on hay in a horse
- 5 stall and the horse then ate the hay and tested positive.
- 6 d. the feed that Triple Crown winner, Justify, ate contained Jimson
- 7 Weed, which was responsible for Justify’s positive drug test for
- 8 scopolamine after his victory in the Santa Anita Derby.

9 74. These related predicate acts (and non-credible incredible excuses),
10 constitute a pattern of racketeering activities affecting interstate commerce
11 designed to harm multiple parties. There is no foreseeable endpoint to the
12 Baffert Defendants’ acts of racketeering against bettors like Plaintiffs and the
13 Class, which qualify as a continued threat of long-term racketeering activity to
14 future victims.

15 75. The Baffert Defendants, despite having been banned from racetracks
16 in the past for doping, continue to train horses and enter them into racing
17 competitions to this day, including two horses in the 146th Preakness, to be run May
18 15th at Pimlico (one of which is Medina Spirit, who just tested positive in the
19 Kentucky Derby).

20 CLASS ACTION ALLEGATIONS

21 76. Plaintiffs bring this action under Federal Rule of Civil Procedure 23
22 against Defendants individually and on behalf of all others similarly situated.
23 Plaintiffs assert all claims on behalf of the Class, defined as follows:

24 Nationwide Class

25 All Kentucky Derby bettors who would have won their
26 bets and winnings had Medina Spirit been properly
27 prohibited from competing in the Kentucky Derby on
28 May 1, 2021 or competed without the aid of an illegal
drug.

1 77. Excluded from the Nationwide Class (also defined as “Class”) are
2 Defendants, any entity in which Defendants have a controlling interest, and
3 Defendants’ officers, directors, legal representatives, successors, subsidiaries, and
4 assigns. Also excluded from the Class is any judge, justice, or judicial officer
5 presiding over this matter, and members of their immediate families and judicial
6 staff.

7 78. Plaintiffs reserve the right to amend the above definitions or to
8 propose alternative or additional subclasses in subsequent pleadings and motions
9 for class certification.

10 79. The members of the Class are referred to herein as “Class Members.”

11 80. Plaintiffs seek the certification of the Class under Rule 23 and RICO.

12 **A. Class Certification is Appropriate**

13 81. The proposed Class meets the requirements of Fed. R. Civ. P. 23(a),
14 (b)(1), (b)(2), (b)(3), and (c)(4).

15 82. Numerosity: The proposed Class is believed to be so numerous that
16 joinder of all members is impracticable.

17 83. Typicality: Plaintiffs’ claims are typical of the claims of the Class.
18 Plaintiff and all members of the Class were injured through Defendants’ uniform
19 misconduct. The same event and conduct that gave rise to Plaintiffs’ claims are
20 identical to those that give rise to the claims of every other Class Member because
21 Plaintiff and each member of the Class lost money as a result of Defendants’
22 RICO violations and violations of common law.

23 84. Adequacy: Plaintiffs are adequate representatives of the Class
24 because their interests do not conflict with the interests of the Class that they seek
25 to represent; Plaintiffs have retained counsel competent and highly experienced in
26 consumer protection class action litigation; and Plaintiffs and Plaintiffs’ counsel
27 intend to prosecute this action vigorously. The interests of the Class will be fairly
28 and adequately protected by Plaintiffs and their counsel.

1 85. Superiority: A class action is superior to other available means of fair
2 and efficient adjudication of the claims of Plaintiffs and the Class. The injury
3 suffered by each individual Class Member is relatively small in comparison to the
4 burden and expense of individual prosecution of complex and expensive litigation.
5 It would be very difficult, if not impossible, for members of the Class individually
6 to effectively redress Defendants' wrongdoing. Even if Class Members could
7 afford such individual litigation, the court system could not. Individualized
8 litigation presents a potential for inconsistent or contradictory judgments.
9 Individualized litigation increases the delay and expense to all parties, and to the
10 court system, presented by the complex legal and factual issues of the case. By
11 contrast, the class action device presents far fewer management difficulties and
12 provides benefits of single adjudication, economy of scale, and comprehensive
13 supervision by a single court.

14 86. Commonality and Predominance: There are many questions of law
15 and fact common to the claims of Plaintiffs and the other members of the Class,
16 and those questions predominate over any questions that may affect individual
17 members of the Class. Common questions for the Class include:

- 18 a. Whether Defendants engaged in the wrongful conduct alleged herein;
- 19 b. Whether the Baffert Defendants engaged in RICO violations as
20 alleged herein;
- 21 c. Whether Defendants' conduct, as alleged herein, resulted in or was
22 the proximate cause of the monetary losses suffered by Plaintiffs and
23 the Class;
- 24 d. Whether Plaintiffs and the Class suffered injury as a proximate result
25 of Defendants' actions;
- 26 e. Whether Plaintiffs and the Class are entitled to recover damages,
27 equitable relief, and other relief;
- 28 f. Whether Defendants' actions alleged herein constitute fraud;

- 1 g. Whether Defendants’ actions alleged herein constitute equitable
2 fraud; and
3 h. Whether Plaintiff and Class members are entitled to punitive
4 damages.

5 **FIRST CAUSE OF ACTION**

6 **Violations of the Federal RICO Act, 18 U.S.C. § 1962(c)**
7 **(On behalf of the Class against Defendants Robert Baffert and Bob Baffert**
8 **Racing Stables, Inc.)**

9 87. All paragraphs set forth above are incorporated by reference as if
10 fully set forth herein.

11 88. Plaintiffs and Class Members are persons “capable of holding a legal
12 or beneficial interest in property” and thus, are “person[s]” within the meaning of
13 18 U.S.C. § 1961(3).

14 89. The Baffert Defendants are also persons or entities “capable of
15 holding a legal or beneficial interest in property” and thus, are a “person” and
16 an “entity” within the meaning of 18 U.S.C. § 1961(3).

17 90. Zedan Racing is an “enterprise” within the meaning of 18 U.S.C. §
18 1961(4) and 1962(c). Zedan Racing was engaged in activities affecting interstate
19 commerce at all times relevant to this complaint.

20 91. The Zedan-Baffert Enterprise is an “enterprise” within the meaning
21 of 18 U.S.C. § 1961(4) and 1962(c). The Zedan-Baffert Enterprise was
22 engaged in activities affecting interstate commerce at all times relevant to this
23 complaint.

24 92. The Baffert Defendants were associated with the enterprises of
25 Zedan Racing and the Zedan-Baffert Enterprise and have conducted or
26 participated, directly or indirectly, in the management and operation of the
27 affairs of each through a pattern of racketeering activity under 18 U.S.C. §§
28 1961(1) and 1961(5).

1 93. The Baffert Defendants have conducted or participated, directly or
2 indirectly, in the conduct of the enterprises through a pattern of racketeering
3 activity within the meaning of 18 U.S.C. § 1962(c).

4 94. The pattern of racketeering activity under 18 U.S.C. §§ 1961(1)(A)
5 and (5) includes the multiple, repeated, and continuous acts of engaging in
6 gambling chargeable under California law, which prohibits them from engaging
7 in illegal gambling chargeable under Cal. Penal Code § 186(a)(8).

8 95. The pattern of racketeering activity under 18 U.S.C. §§ 1961(1)(B),
9 1961(5), and 18 U.S.C. § 1952(a)(3) also includes traveling in interstate
10 commerce and using a facility in interstate and foreign commerce – that is, the
11 simulcast broadcasting by wire and television of races at Churchill Downs and
12 other tracks – to promote, manage, establish, carry on, or facilitate the promotion,
13 management, establishment, or carrying on of any unlawful activity, including in
14 violation of the laws of California, by engaging in illegal gambling chargeable
15 under Cal. Penal Code § 186(a)(8).

16 96. As a direct result of the Baffert Defendants’ violations of 18
17 U.S.C. §§ 1962(c), Plaintiffs and the Class have suffered substantial injury to their
18 business or property within the meaning of 18 U.S.C. §§ 1964(c), including
19 damages in the amounts alleged in the Complaint and to be further determined at
20 trial. Plaintiffs and the Class are “persons” under 18 U.S.C. § 1962 and may sue
21 therefore in this Court and “recover threefold the damages he sustains and the cost
22 of the suit, including a reasonable attorney’s fee,” pursuant to 18 U.S.C. § 1964(c).

23 **SECOND CAUSE OF ACTION**

24 **Violations of 18 U.S.C. § 1962(d) by Conspiring to Violate 18 U.S.C. 1962(c)**
25 **(On behalf of the Class against Defendants Robert Baffert and Bob Baffert**
26 **Racing Stables, Inc.)**

27 97. All paragraphs set forth above are incorporated by reference as if
28 fully set forth herein.

1 98. Plaintiffs and Class Members are persons “capable of holding a legal
2 or beneficial interest in property” and thus, are “person[s]” within the meaning of
3 18 U.S.C. § 1961(3).

4 99. The Baffert Defendants are also “person[s]” or “entit[ies]” that are
5 “capable of holding a legal or beneficial interest in property” and thus, are a
6 person or entity within the meaning of 18 U.S.C. § 1961(3).

7 100. The Baffert Defendants conspired with other individuals within the
8 meaning of 18 U.S.C. § 1962(d) to violate 18 U.S.C. § 1962(c). Specifically,
9 upon information and belief, the Baffert Defendants conspired together and with
10 other individuals to conduct or participate, directly or indirectly, in the pattern
11 of racketeering activity set forth in this Complaint.

12 101. This act of conspiring to engage in the pattern of racketeering activity
13 alleged herein, which falls under 18 U.S.C. §§ 1961(1)(A), 1961(1)(B), and
14 1961(5), includes the multiple, repeated, and continuous acts of engaging in
15 illegal gambling, which is also chargeable under Cal. Penal Code § 186(a)(8).

16 102. The pattern of racketeering activity under 18 U.S.C. §§ 1961(1)(B),
17 (5), and 18 U.S.C. § 1952(a)(3) also includes traveling in interstate commerce
18 and using a facility in interstate and foreign commerce – that is, the simulcast
19 broadcasting by wire and television of races at Churchill Downs and other tracks
20 – to promote, manage, establish, carry on, or facilitate the promotion,
21 management, establishment, or carrying on of any unlawful activity, including in
22 violation of the laws of California, by engaging in illegal gambling chargeable
23 under Cal. Penal Code § 186(a)(8).

24 103. As a direct result of the Baffert Defendants’ violation of 18
25 U.S.C. § 1962(c), Plaintiffs and the Class have suffered substantial injury to their
26 business or property within the meaning of 18 U.S.C. § 1964(c), including
27 damages in the amounts alleged in the Complaint, to be further determined at trial.

28 //

THIRD CAUSE OF ACTION

**Common Law Fraud
(On behalf of the Class against all Defendants)**

104. All paragraphs set forth above are incorporated by reference as if fully set forth herein.

105. Defendants misrepresented to bettors that they entered a horse that complied with the Racetrack Rules, including and especially those regarding horse doping. The Baffert Defendants also misrepresented that they would be retaining Dr. Michael Hore prior to the race to ensure rule compliance.

106. Defendants made these misrepresentation by virtue of, among other things, presenting Medina Spirit to race in the Kentucky Derby, as though they were compliant with Racetrack Rules.

107. The Defendants' misrepresentation was material because pari-mutuel wagering cannot function without fairness and administering a banned substance to a horse is unethical and in contra to the spirit of fair competition.

108. Upon information and belief, defendants knew or believed that their representation was false.

109. Defendants intended that bettors such as Plaintiffs would rely on their misrepresentation to induce them to make wagers, as a track's purse structure and bet payouts come directly from the total amount bet by the public.

110. Plaintiffs and Class Members relied on these misrepresentations when researching and selecting horses upon which to place their bets.

111. Plaintiffs and Class Members were damaged due to Defendants' misrepresentations through the loss of their bets and winnings.

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1 **FOURTH CAUSE OF ACTION**

2 **Equitable Fraud**
3 **(On behalf of the Class against all Defendants)**

4 112. All paragraphs set forth above are incorporated by reference as if
5 fully set forth herein.

6 113. Defendants misrepresented to bettors that they entered a horse that
7 complied with the Racetrack Rules, including and especially those regarding
8 horse doping. The Baffert Defendants also misrepresented that they would be
9 retaining Dr. Michael Hore prior to the race to ensure rule compliance.

10 114. These misrepresentations were material because pari-mutuel wagering
11 cannot function without fairness, and administering a banned substance to a horse
12 is antithetical to the spirit of fair competition.

13 115. Defendants intended that bettors such as Plaintiffs would rely on their
14 misrepresentations to induce them to make wagers, as a track's purse structure
15 comes directly from the total amount bet by the public.

16 116. Plaintiffs and Class Members relied on these misrepresentations when
17 researching and selecting horses upon which to place their bets.

18 117. Plaintiffs and Class Members were damaged, due to Defendants'
19 misrepresentations, through the loss of their bets and winnings.

20 **REQUEST FOR RELIEF**

21 WHEREFORE, Plaintiffs respectfully request the Court grant judgment
22 against Defendants and in favor of Plaintiffs as follows:

- 23 a. certifying this action as a class action under Fed. R. Civ. P. 23,
24 defining the Class as requested herein, appointing the undersigned as
25 Class counsel, and finding that Plaintiffs are proper representatives of
26 the Class requested herein;
- 27 b. awarding damages in favor of Plaintiffs and the Class against the
28 Baffert Defendants, with pre- and post-suit interest thereon and other

1 appropriate monetary relief, including attorney fees, expenses, costs,
2 and such other further relief as is just and proper, for their violations
3 of federal RICO law;

- 4 c. awarding injunctive relief enjoining the Baffert Defendants from
5 engaging in any further racketeering acts;
- 6 d. ordering the Baffert Defendants to divest themselves of any interest
7 (direct or indirect) in any enterprise, and imposing reasonable
8 restrictions on the Baffert Defendants' future activities in
9 thoroughbred racing;
- 10 e. requiring Defendants to pay the costs involved in notifying the Class
11 Members about the judgment and administering the claims process;
- 12 f. awarding damages against all Defendants, jointly and severally,
13 together with pre- and post-suit interest thereon, for the common law
14 fraud claims against them;
- 15 g. awarding Plaintiffs reasonable costs and expenses incurred in this
16 action, including but not limited to counsel fees and expert fees;
- 17 h. ordering Defendants to pay to Plaintiff and the Class the amount they
18 would have won, but for the illegal doping of Medina Spirit;
- 19 i. awarding Plaintiff and the Class treble, consequential, and punitive
20 damages; and
- 21 j. awarding Plaintiff such other and further relief as the Court may
22 deem just and proper.

23 **DEMAND FOR JURY TRIAL**

24 Plaintiff hereby demands a trial by jury on all appropriate issues raised in
25 this Class Action Complaint.

26 //

27 //

28 //

1 DATED: May 13, 2021

GREEN & NOBLIN, P.C.

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3
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22
23 *Counsel for Plaintiffs and the Proposed*
Class

EXHIBIT 1

Comprehensive Ruling Report

Rulings Against: BOB A BAFFERT

Legal Name: BOB A BAFFERT

Birth Date: 1/13/1953

61 Total Ruling(s) Listed

"Multiple medication violation points and point totals are for advisory and informational purposes only to indicate the existence of regulatory medication violation determinations made by racing regulatory entities in order to notify officials of possible aggravating factors that should be reviewed by officials prior to taking regulatory action. Confirmation of violations should be made directly with the racing regulatory entity responsible."

Ruling #: 1

Ruling Number:	2020-OP-29	Date:	7/14/2020
Issued By:	Arkansas Racing Commission	Facility:	Oaklawn Park
Ruling Type:	By Order of Commission/Administration		
Division:	Horse	Breed:	Thoroughbred
Effective Date:	7/14/2020	Race Date:	N/A
Infraction Date:	5/2/2020	Infraction Facility:	Oaklawn Park
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A
Fine Amount:	\$ 0	Fine Paid:	N/A
Suspension Start:	8/1/2020	Suspension End:	8/15/2020

Actions:

Alpha Ruling: 2020-OP-29

Action Type: Initial Ruling

Issue Date: 7/14/2020

Action Text:

Trainer Bob Baffert is suspended for fifteen (15) days, Saturday, August 1, 2020 through and including Saturday, August 15, 2020 for violation of Arkansas Racing Commission Rule 1233. The trainer shall be responsible for and be the absolute insurer of the condition of an entry the trainer enters regardless of the acts of third parties.

Ruling #: 2

Ruling Number:	2020-OP-28	Date:	7/14/2020
Issued By:	Arkansas Racing Commission	Facility:	Oaklawn Park
Ruling Type:	By Order of Commission/Administration		
Division:	Horse	Breed:	Thoroughbred
Effective Date:	7/14/2020	Race Date:	5/2/2020
Infraction Date:	5/2/2020	Infraction Facility:	Oaklawn Park
Race Number:	7	Animal Name:	Gamine
Under Appeal:	False	Appeal Date:	N/A
Fine Amount:	\$ 0	Fine Paid:	N/A

Suspension Start: None

Suspension End: None

Actions:

Alpha Ruling: 2020-OP-28

Action Type: Initial Ruling

Issue Date: 7/14/2020

Action Text:

On report of Truesdail Laboratories Incorporated, the official testing laboratory of the Arkansas Racing Commission, that the sample taken from "Gamine", first place finisher in the seventh race, Saturday, May 2, 2020, contained the prohibited substance 3-hydroxylidocaine which is a class two (2) substance, included in the uniform classification guidelines for foreign substances, provided by the Association of Racing Commissioners International Incorporated. In violation of Arkansas Racing Commission Rule 1217(b) "Gamine" is disqualified and unplaced. The purse of the race is redistributed as follows: first, "Speech", second, "Queen Bridget", third, "Kiss the Girl", fourth, "A'int Elmers", fifth, "Bootytama", sixth, "Foreign Exchange", seventh, "Seahawk Lisa", eighth, "Black Kat Taps", ninth, "Roadrunner's Honor", tenth, "Orquidias Biz". Pari-mutuel wagering is not affected by this ruling.

Ruling #: 3

Ruling Number:	2020-OP-27	Date:	7/14/2020
Issued By:	Arkansas Racing Commission	Facility:	Oaklawn Park
Ruling Type:	By Order of Commission/Administration		
Division:	Horse	Breed:	Thoroughbred
Effective Date:	7/14/2020	Race Date:	7/2/2020
Infraction Date:	5/2/2020	Infraction Facility:	Oaklawn Park
Race Number:	11	Animal Name:	Charlatan
Under Appeal:	False	Appeal Date:	N/A
Fine Amount:	\$ 0	Fine Paid:	N/A
Suspension Start:	None	Suspension End:	None

Actions:

Alpha Ruling: 2020-OP-27

Action Type: Initial Ruling

Issue Date: 7/14/2020

Action Text:

On report of Truesdail Laboratories Incorporated, the official testing laboratory for the Arkansas Racing Commission, that the blood sample taken from "Charlatan", first place finisher in the eleventh race, Saturday May 2, 2020, contained the prohibited substance 3-hydroxylidocaine, which is a class two (2) substance, included in the uniform classification guidelines for foreign substances, provided by the Association of Racing Commissioners International Incorporated. In violation of Arkansas Racing Commission Rule 1217(b), "Charlatan" is disqualified and unplaced. The purse of this race is redistributed as follows: first, "Basin", second, "Gouverneur Morris", third, "Winning Impression", fourth, "Anneau d Or", fifth, "Crypto Cash, sixth, "Mo Mosa", seventh, "Jungle Runner", eighth, "My Friends Beer". Pari-mutuel wagering is not affected by this ruling.

Ruling #: 4

Ruling Number:	LATS008	Date:	1/20/2013
Issued By:	California Horse Racing Board	Facility:	Los Angeles Turf Club
Ruling Type:	Failure to Have Horse Properly Shod		
Division:	Horse	Breed:	Thoroughbred

Effective Date:	N/A	Race Date:	N/A
Infraction Date:	N/A	Infraction Facility:	N/A
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A
Fine Amount:	\$ 200	Fine Paid:	N/A
Suspension Start:	None	Suspension End:	None

Actions:

Alpha Ruling: LATS008

Action Type: Initial Ruling

Issue Date: 1/20/2013

Action Text:

Trainer BOB BAFFERT is fined TWO HUNDRED DOLLARS (\$200.00)* pursuant to California Horse Racing Board rule #1530 (Cases Not Covered by Rules and Regulations) for failure to have his horse "Lady Ten" properly shod for the eighth race at Santa Anita Park on January 19, 2013.

Ruling #: 5

Ruling Number:	12705	Date:	10/10/2012
Issued By:	Indiana Racing Commission	Facility:	Hoosier Park
Ruling Type:	Race Office/Track Rule Violation		
Division:	Horse	Breed:	Thoroughbred
Effective Date:	N/A	Race Date:	N/A
Infraction Date:	N/A	Infraction Facility:	N/A
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A
Fine Amount:	\$ 100	Fine Paid:	N/A
Suspension Start:	None	Suspension End:	None

Actions:

Alpha Ruling: 12705

Action Type: Initial Ruling

Issue Date: 10/10/2012

Action Text:

Trainer Bob Baffert is fined one hundred dollars (\$100) for attempting to use blinkers on "Ellafitz" in the Tenth Race on October 6, 2012, that did not meet the minimum cup requirements of 1 1/2 inches, a violation of 71 IAC 7.5-6-1 (g).

Ruling #: 6

Ruling Number:	HRT004	Date:	11/19/2011
Issued By:	California Horse Racing Board	Facility:	Hollywood Park
Ruling Type:	Failure to Follow Facility Regulations		
Division:	Horse	Breed:	Thoroughbred
Effective Date:	N/A	Race Date:	N/A
Infraction Date:	N/A	Infraction Facility:	N/A
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A

Fine Amount: \$ 100

Fine Paid: N/A

Suspension Start: None

Suspension End: None

Actions:

Alpha Ruling: HARTH004

Action Type: Initial Ruling

Issue Date: 11/19/2011

Action Text:

Trainer BOB BAFFERT is fined ONE HUNDRED DOLLARS (\$100.00)* pursuant to California Horse Racing Board rule #1437 (Conditions of a Race Meeting-authorizing a workout while the horse ambulance was on the race track). *Rule 1532 - Fine shall be paid to the Paymaster within seven calendar days from the date of this ruling or the license of the person upon whom the fine has been imposed shall be suspended.

Ruling #: 7

Ruling Number: DMTD045

Date: 8/25/2010

Issued By: California Horse
Racing Board

Facility: Del Mar

Ruling Type: Failure to Follow
Facility Regulations

Division: Horse

Breed: Thoroughbred

Effective Date: N/A

Race Date: N/A

Infraction Date: N/A

Infraction Facility: N/A

Race Number: N/A

Animal Name: N/A

Under Appeal: False

Appeal Date: N/A

Fine Amount: \$ 100

Fine Paid: N/A

Suspension Start: None

Suspension End: None

Actions:

Alpha Ruling: DMTD045

Action Type: Initial Ruling

Issue Date: 8/25/2010

Action Text:

Trainer Bob Baffert is fined One Hundred Dollars*(\$100) for violation of California Horse Racing Board rule #1930 (Obedience to Security Officers and Public Safety Officers – parking violations). *Rule # 1532 – Fine shall be paid to the Paymaster within seven calendar days from the date of this ruling, or the person upon whom the fine is imposed shall be suspended.

Ruling #: 8

Ruling Number: DMTD004

Date: 7/28/2010

Issued By: California Horse
Racing Board

Facility: Del Mar

Ruling Type: Failure to Have
Horse Properly
Shod

Division: Horse

Breed: Thoroughbred

Effective Date: N/A

Race Date: N/A

Infraction Date: N/A

Infraction Facility: N/A

Race Number: N/A

Animal Name: N/A

Under Appeal: False

Appeal Date: N/A

Fine Amount: \$ 200

Fine Paid: N/A

Suspension Start: None

Suspension End: None

Actions:

Alpha Ruling: DMTD004

Action Type: Initial Ruling

Issue Date: 7/28/2010

Action Text:

Trainer BOB BAFFERT is fined two hundred dollars (\$200.00)* pursuant to California Horse Racing Board rule 1555 (Duties of Horseshoe Inspector) for violation of California Horse Racing Board rule 1437 (Conditions of a Race Meeting – horse improperly shod for turf) before the running of the sixth race on July 23, 2010 at Del Mar Race Track. *Rule # 1532 – Fine shall be paid to the Paymaster within seven calendar days from the date of this ruling, or the person upon whom the fine is imposed shall be suspended

Ruling #: 9

Ruling Number:	LATS061	Date:	3/4/2010
Issued By:	California Horse Racing Board	Facility:	Los Angeles Turf Club
Ruling Type:	Medication/Drug Violation - Animal		
Division:	Horse	Breed:	Thoroughbred
Effective Date:	N/A	Race Date:	N/A
Infraction Date:	N/A	Infraction Facility:	N/A
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A
Drug:	Flunixin		
Fine Amount:	\$ 1000	Fine Paid:	N/A
Suspension Start:	None	Suspension End:	None

Actions:

Alpha Ruling: LATS061

Action Type: Initial Ruling

Issue Date: 3/4/2010

Action Text:

Trainer ROBERT "BOB" BAFFERT, who started the horse "Mother Ruth", the fifth place finisher in the third race at Santa Anita Race Track on January 7, 2010, is fined ONE THOUSAND DOLLARS (\$1,000.00)* pursuant to California Horse Racing Board rule #1887 (Trainer to Insure Condition of Horse) for violation of California Horse Racing Board rule #1844 (c) (2) (Authorized Medication – Flunixin in excess of permitted level – 1st offense). *Rule #1532. Fine shall be paid to the Paymaster within seven calendar days from the date of this ruling, or the license of the person upon whom the fine has been imposed shall be suspended.

Ruling #: 10

Ruling Number:	DMTD034	Date:	8/23/2009
Issued By:	California Horse Racing Board	Facility:	Del Mar
Ruling Type:	Failure to Properly Identify/Present Horse or Greyhound		
Division:	Horse	Breed:	Thoroughbred
Effective Date:	N/A	Race Date:	N/A
Infraction Date:	N/A	Infraction Facility:	N/A
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A

Fine Amount: \$ 100

Fine Paid: N/A

Suspension Start: None

Suspension End: None

Actions:

Alpha Ruling: DMTD034

Action Type: Initial Ruling

Issue Date: 8/23/2009

Action Text:

Trainer BOB BAFFERT is fined ONE HUNDRED DOLLARS (\$100)* for violation of California Horse Racing Board rules #1852(Reporting to Receiving Barn) and #1894(Duties of Trainer) with his horse RICHARD'S KID in the eighth race at Del Mar Thoroughbred Club on August 5, 2009. *Rule # 1532 – Fine shall be paid to the Paymaster within seven calendar days from the date of this ruling, or the person upon whom the fine is imposed shall be suspended.

Ruling #: 11

Ruling Number: HIRTH028

Date: 5/28/2009

Issued By: California Horse Racing Board

Facility: Hollywood Park

Ruling Type: Failure to Properly Identify/Present Horse or Greyhound

Division: Horse

Breed: Thoroughbred

Effective Date: N/A

Race Date: N/A

Infraction Date: N/A

Infraction Facility: N/A

Race Number: N/A

Animal Name: N/A

Under Appeal: False

Appeal Date: N/A

Fine Amount: \$ 100

Fine Paid: N/A

Suspension Start: None

Suspension End: None

Actions:

Alpha Ruling: HIRTH028

Action Type: Initial Ruling

Issue Date: 5/28/2009

Action Text:

Trainer BOB BAFFERT, is fined ONE HUNDRED DOLLARS (\$100.00)* for violation of California Horse Racing Board rules #1852 (Reporting to Receiving Barn Late) and #1894 (Duties of Trainer) with his horse "Underground" in the fourth race on May 16, 2009. *Rule 1532 - Fine shall be paid to the Paymaster within seven calendar days from the date of this ruling or the license of the person upon whom the fine has been imposed shall be suspended.

Ruling #: 12

Ruling Number: LATS009

Date: 1/9/2009

Issued By: California Horse Racing Board

Facility: Los Angeles Turf Club

Ruling Type: Failure to Properly Identify/Present Horse or Greyhound

Division: Horse

Breed: Thoroughbred

Effective Date: N/A

Race Date: N/A

Infraction Date: N/A

Infraction Facility: N/A

Race Number: N/A

Animal Name: N/A

Under Appeal: False Appeal Date: N/A
 Fine Amount: \$ 100 Fine Paid: N/A
 Suspension Start: None Suspension End: None
 Actions:

Alpha Ruling: LATS009 Action Type: Initial Ruling Issue Date: 1/9/2009
 Action Text:

Trainer BOB BAFFERT is fined ONE HUNDRED DOLLARS (\$100.00)* for violation of California Horse Racing Board rules #1852 (Reporting to the Receiving Barn – Late) and #1894 (Duties of a Trainer) with his horse "Grecian" in the fifth race on January 2, 2009 at Santa Anita Park. *Rule #1532. Fine shall be paid to the Paymaster within seven calendar days from the date of this ruling, or the license of the person upon whom the fine has been imposed shall be suspended.

Ruling #: 13

Ruling Number: OTTS021 Date: 10/19/2007
 Issued By: California Horse Racing Board Facility: Oak Tree At Santa Anita
 Ruling Type: Medication/Drug Violation - Animal
 Division: Horse Breed: Thoroughbred
 Effective Date: N/A Race Date: N/A
 Infraction Date: N/A Infraction Facility: N/A
 Race Number: N/A Animal Name: N/A
 Under Appeal: False Appeal Date: N/A
 Drug: Furosemide
 Fine Amount: \$ 300 Fine Paid: N/A
 Suspension Start: None Suspension End: None
 Actions:

Alpha Ruling: OTTS 021 Action Type: Initial Ruling Issue Date: 10/19/2007
 Action Text:

Trainer BOB BAFFERT is fined the sum of THREE HUNDRED DOLLARS (\$300.00)* pursuant to California Horse Racing Board rule #1629 (Penalty for Late Declaration) for failure to have the horse Stormy Woods treated with Lasix in a timely fashion necessitating a late scratch on Saturday October 13, 2007; a violation of California Horse Racing Board rule #1845 (Authorized Bleeder Medication). *Rule #1532. Fine shall be paid to the Paymaster within seven calendar days from the date of this ruling, or the license of the person upon whom the fine has been imposed shall be suspended.

Ruling #: 14

Ruling Number: DMTD094 Date: 8/26/2006
 Issued By: California Horse Racing Board Facility: Del Mar
 Ruling Type: Failure to Follow Facility Regulations
 Division: Horse Breed: Thoroughbred
 Effective Date: N/A Race Date: N/A
 Infraction Date: N/A Infraction Facility: N/A

Race Number: N/A Animal Name: N/A
 Under Appeal: False Appeal Date: N/A
 Fine Amount: \$ 25 Fine Paid: N/A
 Suspension Start: None Suspension End: None
 Actions:

Alpha Ruling: DMTD094

Action Type: Initial Ruling

Issue Date: 8/26/2006

Action Text:

Trainer BOB BAFFERT is hereby fined twenty five dollars (\$25.00)* for violation of stable area regulations pursuant to California Horse Racing Board Rule #1530 (Cases Not Covered by Rules and Regulations). *Rule # 1532 – Fine shall be paid to the Paymaster within seven calendar days from the date of this ruling, or the person upon whom the fine is imposed shall be suspended

Ruling #: 15

Ruling Number: 001 Date: 6/4/2006
 Issued By: Kentucky Racing Facility: Churchill Downs
 Commission
 Ruling Type: Failure to Follow
 Facility Regulations
 Division: Horse Breed: Thoroughbred
 Effective Date: N/A Race Date: N/A
 Infraction Date: N/A Infraction Facility: N/A
 Race Number: N/A Animal Name: N/A
 Under Appeal: False Appeal Date: N/A
 Fine Amount: \$ 500 Fine Paid: N/A
 Suspension Start: None Suspension End: None
 Actions:

Alpha Ruling: 001

Action Type: Initial Ruling

Issue Date: 6/4/2006

Action Text:

Fined for interfering with and failure to obey the orders of security personal in the tunnel between the track and the paddock and in the paddock before the 10th race on May 6,2006.

Ruling #: 16

Ruling Number: 01-036 Date: 3/24/2005
 Issued By: California Horse Racing Facility: Unknown
 Board
 Ruling Type: Appeal/Stay Granted
 Division: Unknown Breed: Unknown
 Effective Date: N/A Race Date: N/A
 Infraction Date: N/A Infraction Facility: N/A
 Race Number: N/A Animal Name: N/A
 Under Appeal: False Appeal Date: N/A
 Fine Amount: \$ 0 Fine Paid: N/A
 Suspension Start: None Suspension End: None
 Actions:

Alpha Ruling: 01-036

Action Type: Initial Ruling

Issue Date: 3/24/2005

Action Text:

APPEAL IS SUSTAINED AND COMPLAINT IS DISMISSED.

Ruling #: 17

Ruling Number:	44010	Date:	8/6/2004
Issued By:	Iowa Racing Commission	Facility:	Prairie Meadows
Ruling Type:	Trainer Responsibility		
Division:	Mixed	Breed:	Mixed
Effective Date:	N/A	Race Date:	N/A
Infraction Date:	N/A	Infraction Facility:	N/A
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A
Fine Amount:	\$ 100	Fine Paid:	N/A
Suspension Start:	None	Suspension End:	None

Actions:

Alpha Ruling: 44010

Action Type: Initial Ruling

Issue Date: 8/6/2004

Action Text:

ON JULY 2, 2004, THE ASSISTANT TRAINER REPRESENTING TRAINER ROBERT BAFFERT, SUBMITTED A PROPERLY EXECUTED TEMPORARY OWNERS LICENSE APPLICATION ON BEHALF OF THE ABSENTEE OWNER AUDRY HAISFIELD (NEVER TELL FARM). IN DOING SO, TRAINER ROBERT BAFFERT ACKNOWLEDGED ACCEPTANCE OF THE RESPONSIBILITY TO NOTIFY THE ABSENTEE OWNER OF THE CONDITIONS OF TEMPORARY LICENSURE, AND TRAINER ROBERT BAFFERT FURTHER UNDERSTOOD THAT SHOULD THE OWNER FAIL TO OBTAIN A PERMANENT LICENSE WITHIN 15 CALENDAR DAYS, TRAINER ROBERT BAFFERT WOULD BE SUBJECT TO A FINE, SUSPENSION, OR BOTH. AUDRY HAISFIELD (NEVER TELL FARM) WAS ISSUED A TEMPORARY LICENSE ON JULY 2, 2004, WHICH EXPIRED ON JULY 19, 2004. AUDRY HAISFIELD (NEVER TELL FARM) HAS FAILED TO OBTAIN A PERMANENT LICENSE WITH THE DESIGNATED 15 CALENDAR DAYS, THEREFORE, TRAINER ROBERT BAFFERT IS HEREBY ASSESSED AN ADMINISTRATIVE PENALTY OF ONE HUNDRED DOLLARS (\$100.00).

Ruling #: 18

Ruling Number:	CDTH109	Date:	6/24/2004
Issued By:	California Horse Racing Board	Facility:	Hollywood Park
Ruling Type:	Failure to Have Horse Properly Shod		
Division:	Horse	Breed:	Thoroughbred
Effective Date:	N/A	Race Date:	N/A
Infraction Date:	N/A	Infraction Facility:	N/A
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A
Fine Amount:	\$ 100	Fine Paid:	N/A
Suspension Start:	None	Suspension End:	None

Actions:

Alpha Ruling: CDTH109

Action Type: Initial Ruling

Issue Date: 6/24/2004

Action Text:

IMPROPERLY SHOD FOR TURF COURSE.

Ruling #: 19

Ruling Number:	12552	Date:	3/28/2003
Issued By:	Louisiana Racing Commission	Facility:	Fair Grounds
Ruling Type:	Medication/Drug Violation - Animal		
Division:	Unknown	Breed:	Unknown
Effective Date:	N/A	Race Date:	N/A
Infraction Date:	N/A	Infraction Facility:	N/A
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A
Drug:	Clenbuterol (Thoroughbred)		
Fine Amount:	\$ 1000	Fine Paid:	Yes
Suspension Start:	None	Suspension End:	None
Actions:			

Alpha Ruling: 12552

Action Type: Initial Ruling

Issue Date: 3/28/2003

Action Text:

CLENBUTEROL, "KAFWAIN," 9TH RACE, 3/9. Horse disqualified.

Ruling #: 20

Ruling Number:	LATS046	Date:	2/9/2003
Issued By:	California Horse Racing Board	Facility:	Los Angeles Turf Club
Ruling Type:	Failure to Properly Identify/Present Horse or Greyhound		
Division:	Unknown	Breed:	Unknown
Effective Date:	N/A	Race Date:	N/A
Infraction Date:	N/A	Infraction Facility:	N/A
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A
Fine Amount:	\$ 100	Fine Paid:	N/A
Suspension Start:	None	Suspension End:	None
Actions:			

Alpha Ruling: LATS 046

Action Type: Initial Ruling

Issue Date: 2/9/2003

Action Text:

LATE TO THE RECEIVING BARN.

Ruling #: 21

Ruling Number:	DMTD094	Date:	9/8/2002
Issued By:	California Horse Racing Board	Facility:	Del Mar
Ruling Type:	Failure to Properly Identify/Present Horse or Greyhound		
Division:	Unknown	Breed:	Unknown
Effective Date:	N/A	Race Date:	N/A
Infraction Date:	N/A	Infraction Facility:	N/A
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A
Fine Amount:	\$ 100	Fine Paid:	N/A
Suspension Start:	None	Suspension End:	None
Actions:			

Alpha Ruling: DMTD094

Action Type: Initial Ruling

Issue Date: 9/8/2002

Action Text:

FAILED TO REPORT TO THE RECEIVING BARN BY THE PRESCRIBED TIME.

Ruling #: 22

Ruling Number:	LATS221	Date:	4/12/2002
Issued By:	California Horse Racing Board	Facility:	Los Angeles Turf Club
Ruling Type:	Medication/Drug Violation - Animal		
Division:	Horse	Breed:	Thoroughbred
Effective Date:	N/A	Race Date:	N/A
Infraction Date:	N/A	Infraction Facility:	N/A
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A
Drug:	Phenylbutazone		
Fine Amount:	\$ 500	Fine Paid:	N/A
Suspension Start:	None	Suspension End:	None
Actions:			

Alpha Ruling: LATS221

Action Type: Initial Ruling

Issue Date: 4/12/2002

Action Text:

PHENYLBUTAZONE, "OFFICER," 2ND RACE, 11/3 -- SECOND OFFENSE.

Ruling #: 23

Ruling Number:	LATS208	Date:	3/27/2002
Issued By:	California Horse Racing Board	Facility:	Los Angeles Turf Club
Ruling Type:	Medication/Drug		

Violation - Animal

Division: Unknown **Breed:** Unknown
Effective Date: N/A **Race Date:** N/A
Infraction Date: N/A **Infraction Facility:** N/A
Race Number: N/A **Animal Name:** N/A
Under Appeal: False **Appeal Date:** N/A
Drug: Phenylbutazone
Fine Amount: \$ 300 **Fine Paid:** N/A
Suspension Start: None **Suspension End:** None

Actions:

Alpha Ruling: LATS208

Action Type: Initial Ruling

Issue Date: 3/27/2002

Action Text:

PHENYLBUTAZONE, "FAVORITE FUNTIME," 8TH RACE, 2/17, WINNER.

Ruling #: 24

Ruling Number: LAFP008 **Date:** 9/14/2001
Issued By: California Horse Racing Board **Facility:** Los Angeles County Fair (Fairplex)
Ruling Type: Medication/Drug Violation - Animal
Division: Unknown **Breed:** Unknown
Effective Date: N/A **Race Date:** N/A
Infraction Date: N/A **Infraction Facility:** N/A
Race Number: N/A **Animal Name:** N/A
Under Appeal: False **Appeal Date:** N/A
Drug: Dexamethasone
Fine Amount: \$ 300 **Fine Paid:** N/A
Suspension Start: None **Suspension End:** None

Actions:

Alpha Ruling: LAFP008

Action Type: Initial Ruling

Issue Date: 9/14/2001

Action Text:

DEXAMETHASONE, "KINSHASA," 3RD RACE, 8/4.

Ruling #: 25

Ruling Number: SAC01-36 **Date:** 6/19/2001
Issued By: California Horse Racing Board **Facility:** Unknown
Ruling Type: Appeal/Stay Denied, Withdrawn, or Waived
Division: Unknown **Breed:** Unknown
Effective Date: N/A **Race Date:** N/A
Infraction Date: N/A **Infraction Facility:** N/A

Race Number: N/A Animal Name: N/A
 Under Appeal: False Appeal Date: N/A
 Fine Amount: \$ 0 Fine Paid: N/A
 Suspension Start: None Suspension End: None
 Actions:

Alpha Ruling: SAC 01-36 Action Type: Initial Ruling Issue Date: 6/19/2001

Action Text:

RE: 6/16 (#CDTH 073) -- STAY DENIED.

Ruling #: 26

Ruling Number: CDTH073 Date: 6/16/2001
 Issued By: California Horse Racing Board Facility: Hollywood Park
 Ruling Type: Medication/Drug Violation - Animal
 Division: Unknown Breed: Unknown
 Effective Date: N/A Race Date: N/A
 Infraction Date: N/A Infraction Facility: N/A
 Race Number: N/A Animal Name: N/A
 Under Appeal: False Appeal Date: N/A
 Drug: Morphine
 Fine Amount: \$ 0 Fine Paid: N/A
 Suspension Start: 6/16/2001 Suspension End: 8/17/2001
 Actions:

Alpha Ruling: CDTH 073 Action Type: Initial Ruling Issue Date: 6/16/2001

Action Text:

MORPHINE - NAUTICAL LOOK, WINNER 7TH RACE, HOLLYWOOD PARK, 5-3-00

Ruling #: 27

Ruling Number: DMTD052 Date: 9/4/1999
 Issued By: California Horse Racing Board Facility: Del Mar
 Ruling Type: Race Office/Track Rule Violation
 Division: Horse Breed: Thoroughbred
 Effective Date: N/A Race Date: N/A
 Infraction Date: N/A Infraction Facility: N/A
 Race Number: N/A Animal Name: N/A
 Under Appeal: False Appeal Date: N/A
 Fine Amount: \$ 300 Fine Paid: N/A
 Suspension Start: None Suspension End: None
 Actions:

Alpha Ruling: DMTD052

Action Type: Initial Ruling

Issue Date: 9/4/1999

Action Text:

VIOLATION OF TRACK POLICY WITH RESPECT TO TURF WORKOUTS.

Ruling #: 28

Ruling Number:	DMTD048	Date:	8/31/1998
Issued By:	California Horse Racing Board	Facility:	Del Mar
Ruling Type:	Medication/Drug Violation - Animal		
Division:	Horse	Breed:	Thoroughbred
Effective Date:	N/A	Race Date:	N/A
Infraction Date:	N/A	Infraction Facility:	N/A
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A
Fine Amount:	\$ 200	Fine Paid:	N/A
Suspension Start:	None	Suspension End:	None

Actions:

Alpha Ruling: DMTD048

Action Type: Initial Ruling

Issue Date: 8/31/1998

Action Text:

98DM0036/NO LASIX/S6620

Ruling #: 29

Ruling Number:	*N*65688	Date:	6/11/1998
Issued By:	Texas Racing Commission	Facility:	Lone Star Park
Ruling Type:	Medication/Drug Violation - Animal		
Division:	Unknown	Breed:	Unknown
Effective Date:	N/A	Race Date:	N/A
Infraction Date:	N/A	Infraction Facility:	N/A
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A
Drug:	Phenylbutazone		
Fine Amount:	\$ 250	Fine Paid:	N/A
Suspension Start:	None	Suspension End:	None

Actions:

Alpha Ruling: *N*65688

Action Type: Initial Ruling

Issue Date: 6/11/1998

Action Text:

EXCESS PHENYLBUTAZONE (2ND OFFENSE).

Ruling #: 30

Ruling Number:	*N*65687	Date:	5/7/1998
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Issued By: Texas Racing Commission **Facility:** Lone Star Park
Ruling Type: Medication/Drug Violation - Animal
Division: Unknown **Breed:** Unknown
Effective Date: N/A **Race Date:** N/A
Infraction Date: N/A **Infraction Facility:** N/A
Race Number: N/A **Animal Name:** N/A
Under Appeal: False **Appeal Date:** N/A
Drug: Phenylbutazone
Fine Amount: \$ 100 **Fine Paid:** N/A
Suspension Start: None **Suspension End:** None
Actions:

Alpha Ruling: *N*65687

Action Type: Initial Ruling

Issue Date: 5/7/1998

Action Text:

EXCESS PHENYLBUTAZONE.

Ruling #: 31

Ruling Number: LATS002 **Date:** 12/27/1996
Issued By: California Horse Racing Board **Facility:** Los Angeles Turf Club
Ruling Type: Race Office/Track Rule Violation
Division: Horse **Breed:** Thoroughbred
Effective Date: N/A **Race Date:** N/A
Infraction Date: N/A **Infraction Facility:** N/A
Race Number: N/A **Animal Name:** N/A
Under Appeal: False **Appeal Date:** N/A
Fine Amount: \$ 200 **Fine Paid:** N/A
Suspension Start: None **Suspension End:** None
Actions:

Alpha Ruling: LATS002

Action Type: Initial Ruling

Issue Date: 12/27/1996

Action Text:

FAIL TO REG HORSE AS BLEEDER

Ruling #: 32

Ruling Number: LATS074 **Date:** 3/15/1995
Issued By: California Horse Racing Board **Facility:** Los Angeles Turf Club
Ruling Type: Failure to Conduct Business in Proper Manner
Division: Horse **Breed:** Thoroughbred
Effective Date: N/A **Race Date:** N/A

Infraction Date: N/A Infraction Facility: N/A
 Race Number: N/A Animal Name: N/A
 Under Appeal: False Appeal Date: N/A
 Fine Amount: \$ 100 Fine Paid: N/A
 Suspension Start: None Suspension End: None
 Actions:

Alpha Ruling: LATS074

Action Type: Initial Ruling

Issue Date: 3/15/1995

Action Text:

FAIL CONDUCT BUSINESS PROPERLY

Ruling #: 33

Ruling Number: LATS069 Date: 2/9/1994
 Issued By: California Horse Racing Board Facility: Unknown
 Ruling Type: Medication/Drug Violation - Animal
 Division: Unknown Breed: Unknown
 Effective Date: N/A Race Date: N/A
 Infraction Date: N/A Infraction Facility: N/A
 Race Number: N/A Animal Name: N/A
 Under Appeal: False Appeal Date: N/A
 Drug: Phenylbutazone
 Fine Amount: \$ 750 Fine Paid: N/A
 Suspension Start: None Suspension End: None
 Actions:

Alpha Ruling: LATS 069

Action Type: Initial Ruling

Issue Date: 2/9/1994

Action Text:

\$750 AND PROBATION THRU 8-31-94 - EXCESS BUTE FOUND IN SAMPLES TAKEN FROM "NORTHERN WOOL" AFTER THE 5TH RACE ON 1-15 AND "DANZIG WITHOUT" AFTER THE 1ST RACE ON 1-20.

Ruling #: 34

Ruling Number: LATS015 Date: 1/7/1994
 Issued By: California Horse Racing Board Facility: Los Angeles Turf Club
 Ruling Type: Medication/Drug Violation - Animal
 Division: Horse Breed: Thoroughbred
 Effective Date: N/A Race Date: N/A
 Infraction Date: N/A Infraction Facility: N/A
 Race Number: N/A Animal Name: N/A
 Under Appeal: False Appeal Date: N/A
 Drug: Phenylbutazone
 Fine Amount: \$ 300 Fine Paid: N/A

Suspension Start: None

Suspension End: None

Actions:

Alpha Ruling: LATS 015

Action Type: Initial Ruling

Issue Date: 1/7/1994

Action Text:

\$300 - EXCESS BUTE FOUND IN SAMPLE TAKEN FROM "DATSDAWAYITIS" AFTER THE 3RD RACE ON 12-4.

Ruling #: 35

Ruling Number: LATS005

Date: 12/31/1992

Issued By: California Horse Racing Board

Facility: Los Angeles Turf Club

Ruling Type: Failure to Properly Identify/Present Horse or Greyhound

Division: Horse

Breed: Thoroughbred

Effective Date: N/A

Race Date: N/A

Infraction Date: N/A

Infraction Facility: N/A

Race Number: N/A

Animal Name: N/A

Under Appeal: False

Appeal Date: N/A

Fine Amount: \$ 50

Fine Paid: N/A

Suspension Start: None

Suspension End: None

Actions:

Alpha Ruling: LATS005

Action Type: Initial Ruling

Issue Date: 12/31/1992

Action Text:

HORSE ON GROUNDS LATE

Ruling #: 36

Ruling Number: LATS098

Date: 2/7/1992

Issued By: California Horse Racing Board

Facility: Los Angeles Turf Club

Ruling Type: Medication/Drug Violation - Animal

Division: Horse

Breed: Thoroughbred

Effective Date: N/A

Race Date: N/A

Infraction Date: N/A

Infraction Facility: N/A

Race Number: N/A

Animal Name: N/A

Under Appeal: False

Appeal Date: N/A

Drug: Glycopyrrolate

Fine Amount: \$ 0

Fine Paid: N/A

Suspension Start: None

Suspension End: None

Actions:

Alpha Ruling: LATS098

Action Type: Initial Ruling

Issue Date: 2/7/1992

Action Text:

POS GLYCOPYRROLATE-91SA0373

Ruling #: 37

Ruling Number:	LATS09	Date:	2/7/1992
Issued By:	California Horse Racing Board	Facility:	Unknown
Ruling Type:	Medication/Drug Violation - Animal		
Division:	Unknown	Breed:	Unknown
Effective Date:	N/A	Race Date:	N/A
Infraction Date:	N/A	Infraction Facility:	N/A
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A
Drug:	Glycopyrrolate		
Fine Amount:	\$ 1000	Fine Paid:	N/A
Suspension Start:	None	Suspension End:	None

Actions:

Alpha Ruling: LATS09**Action Type:** Initial Ruling**Issue Date:** 2/7/1992**Action Text:**

\$1,000, 30 DAYS (15 STAYED AND SHALL SERVE 15 FROM 2-12 THRU 2-26) AND PROBATION THRU 12-31-92 - GLYCOPYRROLATE FOUND IN SAMPLE TAKEN FROM "GEE MARCUS," WINNER OF THE 2ND RACE ON 11-17.

Ruling #: 38

Ruling Number:	LATS010	Date:	1/3/1992
Issued By:	California Horse Racing Board	Facility:	Los Angeles Turf Club
Ruling Type:	Race Office/Track Rule Violation		
Division:	Horse	Breed:	Thoroughbred
Effective Date:	N/A	Race Date:	N/A
Infraction Date:	N/A	Infraction Facility:	N/A
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A
Fine Amount:	\$ 0	Fine Paid:	N/A
Suspension Start:	None	Suspension End:	None

Actions:

Alpha Ruling: LATS010**Action Type:** Initial Ruling**Issue Date:** 1/3/1992**Action Text:**

LATE DECLARATION

Ruling #: 39

Ruling Number:	LATS01	Date:	1/3/1992
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Issued By: California Horse Racing Board Facility: Unknown
 Ruling Type: Race Office/Track Rule Violation
 Division: Unknown Breed: Unknown
 Effective Date: N/A Race Date: N/A
 Infraction Date: N/A Infraction Facility: N/A
 Race Number: N/A Animal Name: N/A
 Under Appeal: False Appeal Date: N/A
 Fine Amount: \$ 100 Fine Paid: N/A
 Suspension Start: None Suspension End: None
 Actions:

Alpha Ruling: LATS01 Action Type: Initial Ruling Issue Date: 1/3/1992

Action Text:

\$100 - VIOLATION OF CHRB RULE #1629 (PENALTY FOR LATE DECLARATION).

Ruling #: 40

Ruling Number: HQQL034 Date: 12/12/1990
 Issued By: California Horse Racing Board Facility: Unknown
 Ruling Type: Trainer Responsibility
 Division: Horse Breed: Thoroughbred
 Effective Date: N/A Race Date: N/A
 Infraction Date: N/A Infraction Facility: N/A
 Race Number: N/A Animal Name: N/A
 Under Appeal: False Appeal Date: N/A
 Fine Amount: \$ 0 Fine Paid: N/A
 Suspension Start: None Suspension End: None
 Actions:

Alpha Ruling: HQQL034 Action Type: Initial Ruling Issue Date: 12/12/1990

Action Text:

LASIX SECURITY VIO. #90LA0288

Ruling #: 41

Ruling Number: DMTD125 Date: 9/7/1990
 Issued By: California Horse Racing Board Facility: Del Mar
 Ruling Type: Race Office/Track Rule Violation
 Division: Horse Breed: Thoroughbred
 Effective Date: N/A Race Date: N/A
 Infraction Date: N/A Infraction Facility: N/A
 Race Number: N/A Animal Name: N/A

Under Appeal: False Appeal Date: N/A
 Fine Amount: \$ 200 Fine Paid: N/A
 Suspension Start: None Suspension End: None
 Actions:

Alpha Ruling: DMTD125 Action Type: Initial Ruling Issue Date: 9/7/1990
 Action Text:
 \$200 - (PENALTY FOR LATE DECLARATION).

Ruling #: 42

Ruling Number: DMTD033 Date: 8/11/1990
 Issued By: California Horse Racing Board Facility: Del Mar
 Ruling Type: Failure to Follow Facility Regulations
 Division: Horse Breed: Thoroughbred
 Effective Date: N/A Race Date: N/A
 Infraction Date: N/A Infraction Facility: N/A
 Race Number: N/A Animal Name: N/A
 Under Appeal: False Appeal Date: N/A
 Fine Amount: \$ 0 Fine Paid: N/A
 Suspension Start: None Suspension End: None
 Actions:

Alpha Ruling: DMTD033 Action Type: Initial Ruling Issue Date: 8/11/1990
 Action Text:
 ILLEGAL PARKING

Ruling #: 43

Ruling Number: HQQL028 Date: 10/5/1989
 Issued By: California Horse Racing Board Facility: Unknown
 Ruling Type: Medication/Drug Violation - Animal
 Division: Horse Breed: Thoroughbred
 Effective Date: N/A Race Date: N/A
 Infraction Date: N/A Infraction Facility: N/A
 Race Number: N/A Animal Name: N/A
 Under Appeal: False Appeal Date: N/A
 Drug: Procaine
 Fine Amount: \$ 0 Fine Paid: N/A
 Suspension Start: None Suspension End: None
 Actions:

Alpha Ruling: HQQL028 Action Type: Initial Ruling Issue Date: 10/5/1989

Action Text:

MEDICATION- PROCAINE

Ruling #: 44

Ruling Number:	LATS135	Date:	4/23/1989
Issued By:	California Horse Racing Board	Facility:	Los Angeles Turf Club
Ruling Type:	Race Office/Track Rule Violation		
Division:	Horse	Breed:	Thoroughbred
Effective Date:	N/A	Race Date:	N/A
Infraction Date:	N/A	Infraction Facility:	N/A
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A
Fine Amount:	\$ 100	Fine Paid:	N/A
Suspension Start:	None	Suspension End:	None

Actions:

Alpha Ruling: LATS135

Action Type: Initial Ruling

Issue Date: 4/23/1989

Action Text:

BLEEDER LIST-LATE REGISTRATION

Ruling #: 45

Ruling Number:	*N*65665	Date:	7/9/1988
Issued By:	California Horse Racing Board	Facility:	Los Alamitos
Ruling Type:	Medication/Drug Violation - Animal		
Division:	Unknown	Breed:	Unknown
Effective Date:	N/A	Race Date:	N/A
Infraction Date:	N/A	Infraction Facility:	N/A
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A
Fine Amount:	\$ 0	Fine Paid:	N/A
Suspension Start:	None	Suspension End:	None

Actions:

Alpha Ruling: *N*65665

Action Type: Initial Ruling

Issue Date: 7/9/1988

Action Text:

\$300 - UNAUTHORIZED MEDICATION (TRIMETHOPRIM, COUGH MEDICATION). (H)

Ruling #: 46

Ruling Number:	*N*65683	Date:	12/8/1987
Issued By:	California Horse Racing Board	Facility:	Unknown

Ruling Type: Medication/Drug
Violation - Animal
Division: Unknown **Breed:** Unknown
Effective Date: N/A **Race Date:** N/A
Infraction Date: N/A **Infraction Facility:** N/A
Race Number: N/A **Animal Name:** N/A
Under Appeal: False **Appeal Date:** N/A
Fine Amount: \$ 0 **Fine Paid:** N/A
Suspension Start: None **Suspension End:** None
Actions:

Alpha Ruling: *N*65683

Action Type: Initial Ruling

Issue Date: 12/8/1987

Action Text:

\$200 - VIOLATION OF RULE 1843(D) (MEDICATION - EXCESS BUTE).

Ruling #: 47

Ruling Number: *N*65666 **Date:** 9/16/1987
Issued By: California Horse Racing Board **Facility:** Hollywood Park
Ruling Type: Race Office/Track
Rule Violation
Division: Unknown **Breed:** Unknown
Effective Date: N/A **Race Date:** N/A
Infraction Date: N/A **Infraction Facility:** N/A
Race Number: N/A **Animal Name:** N/A
Under Appeal: False **Appeal Date:** N/A
Fine Amount: \$ 0 **Fine Paid:** N/A
Suspension Start: None **Suspension End:** None
Actions:

Alpha Ruling: *N*65666

Action Type: Initial Ruling

Issue Date: 9/16/1987

Action Text:

\$200 - VIOLATION OF RULE 1629 (PENALTY FOR LATE DECLARATION).

Ruling #: 48

Ruling Number: *N*65667 **Date:** 8/26/1987
Issued By: California Horse Racing Board **Facility:** Hollywood Park
Ruling Type: Medication/Drug
Violation - Animal
Division: Unknown **Breed:** Unknown
Effective Date: N/A **Race Date:** N/A
Infraction Date: N/A **Infraction Facility:** N/A
Race Number: N/A **Animal Name:** N/A
Under Appeal: False **Appeal Date:** N/A

Drug: Phenylbutazone
 Fine Amount: \$ 0 Fine Paid: N/A
 Suspension Start: None Suspension End: None
 Actions:

Alpha Ruling: *N*65667 Action Type: Initial Ruling Issue Date: 8/26/1987

Action Text:

\$200 - HORSE "TRICHENG" HAD EXCESS OF BUTE IN 6TH RACE ON 8-6.

Ruling #: 49

Ruling Number: *N*65684 Date: 3/23/1986
 Issued By: California Horse Racing Board Facility: Unknown
 Ruling Type: Medication/Drug Violation - Animal
 Division: Unknown Breed: Unknown
 Effective Date: N/A Race Date: N/A
 Infraction Date: N/A Infraction Facility: N/A
 Race Number: N/A Animal Name: N/A
 Under Appeal: False Appeal Date: N/A
 Fine Amount: \$ 0 Fine Paid: N/A
 Suspension Start: None Suspension End: None
 Actions:

Alpha Ruling: *N*65684 Action Type: Initial Ruling Issue Date: 3/23/1986

Action Text:

\$500 AND PLACED ON PROBATION THRU 4-20 - VIOLATION OF RULE 1843(D) (MEDICATION IN EXCESS OF PERMITTED LEVEL).

Ruling #: 50

Ruling Number: *N*65679 Date: 3/14/1986
 Issued By: California Horse Racing Board Facility: Unknown
 Ruling Type: Medication/Drug Violation - Animal
 Division: Unknown Breed: Unknown
 Effective Date: N/A Race Date: N/A
 Infraction Date: N/A Infraction Facility: N/A
 Race Number: N/A Animal Name: N/A
 Under Appeal: False Appeal Date: N/A
 Fine Amount: \$ 0 Fine Paid: N/A
 Suspension Start: None Suspension End: None
 Actions:

Alpha Ruling: *N*65679 Action Type: Initial Ruling Issue Date: 3/14/1986

Action Text:

\$300 - VIOLATION OF RULE 1843(D) (MEDICATION IN EXCESS OF PERMITTED LEVEL).

Ruling #: 51

Ruling Number:	*N*65668	Date:	3/2/1986
Issued By:	California Horse Racing Board	Facility:	Unknown
Ruling Type:	Medication/Drug Violation - Animal		
Division:	Unknown	Breed:	Unknown
Effective Date:	N/A	Race Date:	N/A
Infraction Date:	N/A	Infraction Facility:	N/A
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A
Fine Amount:	\$ 0	Fine Paid:	N/A
Suspension Start:	None	Suspension End:	None

Actions:

Alpha Ruling:	*N*65668	Action Type:	Initial Ruling	Issue Date:	3/2/1986
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Action Text:

\$200 - VIOLATION OF RULE 1843(D) (MEDICATION IN EXCESS OF PERMITTED LEVEL).

Ruling #: 52

Ruling Number:	*N*65669	Date:	3/30/1985
Issued By:	California Horse Racing Board	Facility:	Unknown
Ruling Type:	Medication/Drug Violation - Animal		
Division:	Unknown	Breed:	Unknown
Effective Date:	N/A	Race Date:	N/A
Infraction Date:	N/A	Infraction Facility:	N/A
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A
Fine Amount:	\$ 0	Fine Paid:	N/A
Suspension Start:	None	Suspension End:	None

Actions:

Alpha Ruling:	*N*65669	Action Type:	Initial Ruling	Issue Date:	3/30/1985
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Action Text:

\$200 - VIOLATION OF RULE 1844(C-1)(HIGH BUTE).

Ruling #: 53

Ruling Number:	*N*65680	Date:	6/26/1984
Issued By:	California Horse Racing Board	Facility:	Los Alamitos
Ruling Type:	Trainer Responsibility		

Division:	Unknown	Breed:	Unknown
Effective Date:	N/A	Race Date:	N/A
Infraction Date:	N/A	Infraction Facility:	N/A
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A
Fine Amount:	\$ 0	Fine Paid:	N/A
Suspension Start:	None	Suspension End:	None

Actions:

Alpha Ruling: *N*65680

Action Type: Initial Ruling

Issue Date: 6/26/1984

Action Text:

\$50 - FAILURE TO KEEP DETENTION STALL OF AN ENTERED REGISTERED BLEEDER UNDER SURVEILLANCE.

Ruling #: 54

Ruling Number:	*N*65671	Date:	11/5/1983
Issued By:	Arizona Department of Racing	Facility:	Turf Paradise
Ruling Type:	Trainer Responsibility		
Division:	Unknown	Breed:	Unknown
Effective Date:	N/A	Race Date:	N/A
Infraction Date:	N/A	Infraction Facility:	N/A
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A
Fine Amount:	\$ 0	Fine Paid:	N/A
Suspension Start:	None	Suspension End:	None

Actions:

Alpha Ruling: *N*65671

Action Type: Initial Ruling

Issue Date: 11/5/1983

Action Text:

\$100 - FAILURE TO SUBMIT TRAINER RESPONSIBILITY FORM FOR THE HORSE DOUBLE SASSEY.

Ruling #: 55

Ruling Number:	*N*65670	Date:	11/5/1983
Issued By:	Arizona Department of Racing	Facility:	Turf Paradise
Ruling Type:	Trainer Responsibility		
Division:	Unknown	Breed:	Unknown
Effective Date:	N/A	Race Date:	N/A
Infraction Date:	N/A	Infraction Facility:	N/A
Race Number:	N/A	Animal Name:	N/A
Under Appeal:	False	Appeal Date:	N/A
Fine Amount:	\$ 0	Fine Paid:	N/A
Suspension Start:	None	Suspension End:	None

Actions:

Alpha Ruling: *N*65670

Action Type: Initial Ruling

Issue Date: 11/5/1983

Action Text:

\$100 - FAILURE TO SUBMIT TRAINER RESPONSIBILITY FORM FOR THE HORSE STRAW MAN JET.

Ruling #: 56

Ruling Number: *N*65681 Date: 11/2/1983
 Issued By: Arizona Department of Racing Facility: Turf Paradise
 Ruling Type: Failure to Properly Identify/Present Horse or Greyhound
 Division: Unknown Breed: Unknown
 Effective Date: N/A Race Date: N/A
 Infraction Date: N/A Infraction Facility: N/A
 Race Number: N/A Animal Name: N/A
 Under Appeal: False Appeal Date: N/A
 Fine Amount: \$ 0 Fine Paid: N/A
 Suspension Start: None Suspension End: None

Actions:

Alpha Ruling: *N*65681

Action Type: Initial Ruling

Issue Date: 11/2/1983

Action Text:

\$100 - FAILURE TO BRING HORSE TO PADDOCK.

Ruling #: 57

Ruling Number: *N*65672 Date: 10/10/1983
 Issued By: Arizona Department of Racing Facility: Turf Paradise
 Ruling Type: Employment Violation
 Division: Unknown Breed: Unknown
 Effective Date: N/A Race Date: N/A
 Infraction Date: N/A Infraction Facility: N/A
 Race Number: N/A Animal Name: N/A
 Under Appeal: False Appeal Date: N/A
 Fine Amount: \$ 0 Fine Paid: N/A
 Suspension Start: None Suspension End: None

Actions:

Alpha Ruling: *N*65672

Action Type: Initial Ruling

Issue Date: 10/10/1983

Action Text:

\$50 - WORKING UNLICENSED HELP.

Ruling #: 58

Ruling Number: *N*65673 Date: 11/11/1981

Issued By: Arizona Department of Racing
Facility: Rillito
Ruling Type: Race Office/Track Rule Violation
Division: Unknown **Breed:** Unknown
Effective Date: N/A **Race Date:** N/A
Infraction Date: N/A **Infraction Facility:** N/A
Race Number: N/A **Animal Name:** N/A
Under Appeal: False **Appeal Date:** N/A
Fine Amount: \$ 0 **Fine Paid:** N/A
Suspension Start: None **Suspension End:** None
Actions:

Alpha Ruling: *N*65673

Action Type: Initial Ruling

Issue Date: 11/11/1981

Action Text:

\$50 - FAILURE TO HAVE OWNER OF HORSE PROPERLY LICENSED AT TIME OF ENTRY.

Ruling #: 59

Ruling Number: *N*65685 **Date:** 1/12/1978
Issued By: California Horse Racing Board **Facility:** Unknown
Ruling Type: By Order of Commission/Administration
Division: Unknown **Breed:** Unknown
Effective Date: N/A **Race Date:** N/A
Infraction Date: N/A **Infraction Facility:** N/A
Race Number: N/A **Animal Name:** N/A
Under Appeal: False **Appeal Date:** N/A
Fine Amount: \$ 0 **Fine Paid:** N/A
Suspension Start: None **Suspension End:** None
Actions:

Alpha Ruling: *N*65685

Action Type: Initial Ruling

Issue Date: 1/12/1978

Action Text:

RE: RULING OF 8-22-77: UPON CONCLUSION OF THE PERIOD OF ONE YEAR FROM 8-22-77 AND THERE BEING NO ADDITIONAL CAUSE FOR SUSPENSION OR DENIAL OF LICENSE, ELIGIBLE FOR TRAINER LICENSE.

Ruling #: 60

Ruling Number: *N*65677 **Date:** 8/22/1977
Issued By: California Horse Racing Board **Facility:** Sacramento
Ruling Type: Medication/Drug Violation - Animal
Division: Unknown **Breed:** Unknown
Effective Date: N/A **Race Date:** N/A

Infraction Date: N/A Infraction Facility: N/A
Race Number: N/A Animal Name: N/A
Under Appeal: False Appeal Date: N/A
Drug: Apomorphine
Drug: Morphine
Fine Amount: \$ 0 Fine Paid: N/A
Suspension Start: None Suspension End: None
Actions:

Alpha Ruling: *N*65677 Action Type: Initial Ruling Issue Date: 8/22/1977

Action Text:

SUSPENDED, CASE REFERRED PURSUANT TO RULE #1845 (PROHIBITED DRUGS--APOMORPHINE) AND #1887 (TRAINER TO INSURE CONDITION OFHORSE).

Ruling #: 61

Ruling Number: *N*65674 Date: 2/10/1975
Issued By: Arizona Department of Racing Facility: Rillito
Ruling Type: Careless/Unsafe/Improper Riding or Driving
Division: Unknown Breed: Unknown
Effective Date: N/A Race Date: N/A
Infraction Date: N/A Infraction Facility: N/A
Race Number: N/A Animal Name: N/A
Under Appeal: False Appeal Date: N/A
Fine Amount: \$ 0 Fine Paid: N/A
Suspension Start: None Suspension End: None
Actions:

Alpha Ruling: *N*65674 Action Type: Initial Ruling Issue Date: 2/10/1975

Action Text:

7 CALENDAR DAYS THRU 2-16 FOR CARELESS RIDING.

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Kentucky Derby Bettors Hit Trainer Baffert with Class Action Over Alleged 'Repeated' Acts of Horse Doping, Racketeering](#)
