

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

JOHN M. ROBB, DVM	:	
	:	
Plaintiff,	:	Case No.
	:	
V.	:	
	:	
CONNECTICUT BOARD OF	:	
VETERINARY MEDICINE,	:	
	:	
B. KENNETH BERNHARD,	:	
	:	
THERESA CIANCIOLO, DVM,	:	
	:	
MARY ANNE O'NEILL,	:	
	:	
TIMOTHY PLUNKETT DVM, and	:	JUNE 10, 2015
	:	
ALFREDO SANCHEZ-LONDONO, DVM	:	
	:	
Defendants.		

VERIFIED COMPLAINT

I. Nature of the Proceedings

1. This is an action under Sections 1 and 2 of the Sherman Act where Plaintiffs seeks compensatory, punitive and/or treble damages and attorneys' fees and costs, where applicable, and a temporary restraining order, pending a hearing on the temporary injunction, a temporary injunction and a permanent injunction and other equitable relief against, Defendants and each of them for their unlawful actions.

II. Jurisdiction, Venue, and Commerce

2. This Court has subject matter jurisdiction over the claims set forth herein pursuant to 28 U.S.C. § 1331 (in that this action is predicated upon a law of the United States), 28 U.S.C. § 1337 (in that the claims herein arise under an Act of Congress regulating commerce or protecting trade and commerce against restraints and monopolies), 15 U.S.C. § 15 (in that Plaintiff was injured in his business or property by reason of actions forbidden in the antitrust laws), and under 18 U.S.C. §§ 1964(a) and (b) (in that this action is predicated upon a law of the United States).
3. Venue properly lies in this district pursuant to 15 U.S.C. §§ 15 and 22 (in that all corporate defendants may be found and transact business in this District) and 28 U.S.C. § 1391(b) (in that a substantial portion of the affected trade and commerce described below has been carried out in this District and a substantial part of the events or omissions giving rise to the claims occurred in this district). Additionally, as to the Individual Defendants, venue lies in this District pursuant to 18 U.S.C. §§ 1964(a) and (b).
4. The acts and practices of the Connecticut Board of Veterinary Medicine and its board members, including the acts and practices alleged herein, are in commerce or affect commerce, as "commerce" is defined in 15 U.S.C. § 12. In particular, veterinarians purchase and receive vaccination products and equipment that are shipped across state lines by manufacturers and suppliers located out of state, and transfer money across state lines in payment for these

products and equipment. Further, the actions alleged herein deter persons from other states in engaging in vaccination practices similar to the Plaintiff's.

III. The Parties

5. The Plaintiff John M. Robb, DVM is a doctor of veterinary medicine residing, licensed and practicing in the State of Connecticut.
6. The Defendant Connecticut Board of Veterinary Medicine ("Veterinary Board") is the sole licensing authority for veterinarians in the state of Connecticut and they supervise the Department of Public Health in this regard. *Conn Gen. Stat. §§20-196b and 20-199*. It is unlawful for an individual to practice veterinary medicine in Connecticut without holding a license to practice issued by the Defendant Veterinary Board. *Conn Gen. Stat. §20-199*. The Defendant Veterinary Board is also tasked with policing instances of alleged veterinary malpractice in the state of Connecticut. *Conn Gen. Stat. §20-196b*.
7. Defendants Theresa Cianciolo, Timothy J. Plunkett, and Alfredo Sanchez-Londono ("three veterinarian defendants") are members of the Defendant Veterinary Board and veterinarians actively practicing in the market for veterinary medical services in the State of Connecticut in direct competition with Plaintiff.
8. Three of the five members of the Defendant Veterinary Board, a majority, are active participants in the companion animal veterinarian medicine industry, including vaccination services.
9. Defendants Mary O'Neill and B. Kenneth Bernard are attorneys and members of the Defendant Veterinary Board.

IV. The Relevant Market

10. The relevant market is the veterinary medicine industry, including the provision of vaccination services to companion animals, in the state of Connecticut. Both Plaintiff and individual defendants offer companion animal vaccination services to citizens of the State of Connecticut.
11. The provision of companion animal vaccination services includes the marketing, provision, sale, and administration of vaccinations, including the anti-rabies vaccination, to companion animals in the state of Connecticut including all feline and canine animal species.
12. The Plaintiff is currently a practitioner of veterinary medicine, including companion animal vaccination services.
13. Defendant Theresa Cianciolo is a practitioner of veterinary medicine at Kensington Bird and Animal Hospital in Kensington, Connecticut and receives compensation for her services and is an active market participant in the veterinary medicine industry, including companion animal vaccination services.
14. Defendant Timothy J. Plunkett is a practitioner of veterinary medicine at Fairfield Veterinary Hospital in Fairfield, Connecticut and receives compensation for his services and is an active market participant in the veterinary medicine industry, including companion animal vaccination services.
15. Defendant Alfredo Sanchez-Londono is practitioner of veterinary medicine at Tufts Ambulatory Service in Woodstock, Connecticut and receives

compensation for his services and is an active market participant in the veterinary medicine industry, including companion animal vaccination services.

16. Each of the three veterinarian defendants is in direct competition with the Plaintiff in the veterinary medicine services industry and is an active market participant in the veterinary medicine industry, including companion animal vaccination services.

17. Each of the three veterinarian defendants offers animal vaccination services at his or her veterinary practice.

V. The Defendant Veterinary Board is Acting to Suppress Competition

18. Plaintiff was the owner of a Banfield Pet Hospital franchise in Stamford, Connecticut beginning in the fall of 2008.

19. In 2005, Purdue University published a peer-reviewed study based upon the data obtained from the Banfield Pet Hospital system that found a direct correlation between the size of an animal and the rate of vaccine associated adverse event reactions [hereinafter "VAAEs"]. See *Moore, George M. et. al, Adverse Events Diagnosed Within Three Days Of Vaccine Administration In Dogs*, 227 *Journal of the American Veterinary Medical Association*, No. 7, 1102 (2005) ("*Purdue Study*").

20. Plaintiff's vaccine protocols and procedures changed over time, based on his clinical experience at the Banfield franchise and the *Purdue Study*, as follows:

The basic vaccines Plaintiff administered to canines are: (1) canine distemper vaccine; (2) parvovirus vaccine; (3) rabies vaccines; (4) leptospirosis vaccine and (5) lyme vaccine. During the several months

operating Plaintiff's Stanford Banfield Pet Hospital, Plaintiff and his staff gave 1ml volume of the rabies vaccine to all dogs. During this time period, Plaintiff and his staff noticed vaccine associated adverse event reactions [VAAEs] in the smaller breeds. These smaller breeds, under 10 lbs., are: CHIHUAHUA, YORKSHIRE TERRIER, DACHSHUND, MALTESE, and TOY POODLE. An example is a Maltese who went into anaphylactic shock and almost died. Plaintiff then called a staff meeting to discuss the vaccine reaction situation that he and his staff were seeing, and based on Plaintiff's clinical experience, he implemented a change in protocol reducing the volume of the vaccine, giving small breeds less than 10 pounds, 0.5ml dose instead of the 1ml dose we had been administering for all five vaccines. Plaintiff and his staff and observed an immediate reduction in VAAEs once this new protocol was adopted. These same factors led Plaintiff to change his vaccine protocol for all five vaccines, to reduce the volume from 1ml to 0.5ml for dog breeds less than 20 lbs., such as the PUG breed. Examples of Mid-size dog breeds in Plaintiff's Banfield practice were: COCKER SPANIELS and BISHONS (20-30 lbs.). Over time Plaintiff and his staff also saw VAAEs in mid-size dogs, such as a Cocker Spaniel who went into anaphylactic shock and almost died. Based on this clinical experience, Plaintiff implemented a change in protocol reducing the volume of the vaccine, giving mid-size breeds, up to 30 lbs., 0.5ml dose, instead of the 1ml dose, Plaintiff and his staff had been administering. Plaintiff and his staff observed an immediate

reduction in the VAAEs once this new protocol was adopted. Based upon Plaintiff's clinical experience, over time his vaccine protocols for all dog breeds under 50 lbs. were changed to the reduced volume of 0.5ml for all five vaccines, given to all dogs under 50 lbs. The reason for the 50 lb. cut-off was that Plaintiff had not seen any VAAEs in the larger breeds over 50 lbs. Other dogs, such as PIT BULLS can weigh between 40-60 plus lbs. Based on Plaintiff's clinical experience, Plaintiff changed his vaccine protocol for all five vaccines reducing the volume from 1ml to 0.5 ml for PIT BULLS under 50 lbs. PIT BULLS over 50 lbs. received 1ml of all five vaccines. Larger breeds treated in Plaintiff's Banfield practice were: LABRADOR RETRIEVER, GERMAN SHEPHERD, ROTTWEILER, PIT BULL GOLDEN RETRIEVER, DOBERMAN, STANDARD POODLE. Plaintiff's vaccine protocol for these large breeds was always a volume of 1ml of all five vaccines.

21. Plaintiff's vaccination procedure, as stated in paragraph 20, did not result in any animals contracting a disease that they were given a vaccine dosage for. Since putting his protocol in place, not a single animal Dr. Robb has vaccinated has contracted a disease it has been vaccinated against and VAAEs have been reduced substantially. A very harmful VAAE that Dr. Robb's protocol of reduced volume virtually eliminated was Anaphylaxis, which is a severe vaccine reaction where the animal passes out and will die without immediate emergency medical intervention.

22. Banfield Pet Hospital was purchased by a subsidiary of the Mars Candy Company corporate umbrella. After Mars purchased Banfield, it attempted to repurchase the Plaintiff's franchise with a well-below-market offer, which Plaintiff rejected. After Dr. Robb rejected Banfield's well-below-market offer, Banfield then illegally terminated Plaintiff's franchise, mainly claiming that it was because Plaintiff did not follow the manufacturer's dosage recommendation regarding rabies vaccine dosages. These events have resulted in a federal lawsuit, initiated by Banfield to terminate Dr. Robb's franchise, where Dr. Robb has counterclaimed that Banfield breached his franchise agreement, committed fraud, and unfair trade practices, among other claims. *See Charter Practices, Inc. et. Al ["Banfield"] v. Robb, John, no. 3:45-cv-1768(RNC) (D. Conn.)*, pending in this Court.
23. After illegally terminating Plaintiff's franchise, in an attempt to bolster their federal case, agents of Banfield filed a complaint with the Defendant Veterinary Board regarding Plaintiff's rabies vaccination procedures, which is the genesis of the present case before the Defendants.
24. *Connecticut General Statutes § 20-204(a)* requires that all veterinary malpractice investigations be concluded within a year of their start.
25. The Department of Public Health brought charges against Plaintiff, before Defendant Veterinary Board, regarding his rabies vaccination procedures among other charges on August 28, 2014, more than a year after the investigation began [December, 2012] in violation of *Connecticut General Statutes § 20-204(a)*.

26. On information and belief, the three veterinarian defendants' vaccination procedures are to follow the manufacturer recommended dosages.
27. By law, a rabies shot can only be administered in Connecticut by a veterinarian licensed to practice by the Connecticut Board of Veterinary Medicine.
28. The Connecticut Board of Veterinary medicine through the Department of Public Health issued Conn. Agencies Regulation The Administrative Regulation at issue is *Conn. Agencies Regs. 22-359-1*, which states in part:
- (4) "Currently vaccinated" means an animal was vaccinated against rabies and is considered immunized based on administration of the primary vaccination at least 30 days previously or immediately after a booster vaccination and vaccinations have been **administered in accordance with licensed rabies vaccine label directions.**
- (5) "Licensed rabies vaccine" means a vaccine against rabies for certain species of animals **licensed by the United States Department of Agriculture** for use in such species and marketed in the United States.
- (10) "Vaccinated" means an animal was vaccinated against rabies **in accordance with licensed rabies vaccine label directions.** (emphasis added).
29. The regulation referenced in paragraph 28 of this complaint was made pursuant to *Conn. Gen. Stat. § 22-359b*, which is silent as to what the dosage of a vaccine should be.

30. There is no clear policy from the State of Connecticut regarding the proper dosage of a vaccine as the statute from the state legislature is silent as to vaccine dosages. Further, the regulation merely states that “label directions” must be followed and contains no specific language regarding dosages.
31. The four present charges by the Department of Health against the plaintiff, which are before the Defendant Connecticut Board of Veterinary Medicine, are as follows:
- a. Respondent instructed employees to administer half doses of rabies vaccines to animals under the weight of fifty pounds;
 - b. Respondent instructed employees to refrigerate unused half doses of rabies vaccines to be used to vaccinate another pet;
 - c. Respondent failed to adequately document medication administration; and/or
 - d. Respondent failed to obtain adequate informed consent from pet owners.
32. During the last hearing on March 27, 2015, the State’s veterinarian expert, Dr. Jeffrey Loeven, testified that charge **b** was no longer applicable and he did not substantiate that charge. On questioning by the Board at the end of the hearing, the expert admitted that the small sample size (2 files) that he reviewed would make any opinion regarding charges **c** and **d** speculation, when Dr. Robb had

seen many hundreds of companion dogs during this period. The remaining charge is charge **a**, the rabies vaccination issue remains.

33. Regarding charge **b**, the veterinarian state expert stated in response to questions from the Board,

Q: So with regard to that allegation would you conclude that Dr.

Robb's practice did not deviate from the standard medical care --

A: Other than giving -- other than giving the half dose, yeah.

Q: just on the refrigeration? I'm only asking about the refrigeration.

A: No, I think refrigerating for a brief period of time would not have any effect on the vaccine.

Veterinary Board Hearing Transcript, March 27, 2015, at page 60: 20 to 61: 4.

34. Regarding charge **c**, the expert stated in response to questions from the Board,

Q: But if I were to press you, you'd ultimately have to say you're speculating on that point?

A: Yes. Yes.

Veterinary Board Hearing Transcript, March 27, 2015, at page 63: 5-7.

35. Regarding charge **d**, the expert stated in response to questions from the Board,

Q: With the opportunity to review hard facts versus the number of cases that he must have had over a period of time that we're investigating, from July 2010 to February 2012, close to 20 months, we'd be speculating on whether he informed patients or owners of pets?

A: All of them, yeah. Yes we would.

Veterinary Board Hearing Transcript, March 27, 2015, at page 64: 1-6.

36. The state veterinarian expert, Dr. Jeffrey Loeven, also stated during the hearing and in his report:

I thought I made it clear that I do not question Dr. Robb's passion concern for his patients, nor his integrity, nor that his protocol had decreased the incidence of observed vaccine reactions. I never claimed that Dr. Robb was unethical or that any damage was done or that the health of pets were compromised as a result. . . . I carefully discussed and tailored my protocols to fit the patient's lifestyles, risks and exposures. I have been very distressed by the rise of corporate veterinary medicine and the pure profit motive being instilled into the medical process. I would never let -- I would never work for, let alone invest, in such entities. I have seen many clients from Banfield in my practice and fully agree with you [Dr. Robb] when you discussed that they promote unnecessary vaccinations, over vaccinate during a given office visit and generally push clients into excessive expenditures at the cost of pet health and safety. . . . I fully agree with your [Dr. Robb's] assertion that you can modify the practice of medicine according to the Aesculapian authority, including the Hippocratic oath. . . . I do think that your [Dr. Robb's] approach resulted in fewer reactions based on limited titers done and lack of documented disease breaks. It also appears that no harm was done either.

Veterinary Board Hearing Transcript, March 27, 2015, at page 15:6 to 23:8.

37. *Conn. Gen. Stat. § 20-196(a)* establishing the Connecticut Board of Veterinary Medicine, requires that 3 of the 5 members be veterinarians.

38. In *North Carolina State Board of Dental Commissioners v. Federal Trade Commission*, 574 U.S. ___, 135 S. Ct. 1101, 191 L. Ed. 2d 35, 2015 U.S. LEXIS 1502, 83 U.S.L.W. 4110, (U.S. February 25 2015), the U.S. Supreme Court held that when a majority of the members of an administrative agency board is made up of active members of the profession that the board is regulating, this is a structural violation of the anti-trust laws and has an anti-competitive impact unless the administrative agency board is directly supervised by a state official that can change, modify or reject the decision.

39. This structural violation of the anti-trust laws, puts the legal standing of the Connecticut Board of Veterinary Medicine in serious question because a majority of the board's members are veterinarians, especially in its case against Dr. John Robb for providing less-than-manufacturer-recommended dosages of vaccines to dogs under 50 pounds, when there is no proof of harm to the animals. There is no supervisory state official that can change, modify or reject the decision of the Connecticut Board of Veterinary Medicine over Dr. Robb.

40. The structural violation derives from the make-up of the Connecticut Board of Veterinary Medicine itself: a majority are active market participants, as required by statute: *Conn. Gen. Stat. § 20-*

196(a) establishing the Connecticut Board of Veterinary Medicine, requires that 3 of the 5 members be veterinarians.

41. There is no supervisor from the state who reviews the decisions the board makes. There is no one who has the power to veto or modify their decisions to ensure that they reflect state policy.

42. The Court held it was the structural risk of having a majority of market participants that ran afoul of the anti-trust laws: “State agencies controlled by active market participants, who possess singularly strong private interests, pose the very risk of self-dealing Midcal’s supervision requirement was created to address. This conclusion does not question the good faith of state officers but rather is **an assessment of the structural risk of market participants’ confusing their own interests with the State’s policy goals.**” *North Carolina State Board of Dental Commissioners v. Federal Trade Commission*, 574 U.S. ___, 135 S. Ct. 1101, 1105 (U.S. February 25 2015) (emphasis added) .

43. Plaintiff’s vaccine procedures are a direct financial threat to the individual defendant’s vaccine procedures because they are safer and just as effective.

44. Each year, 70% of all canine visits veterinarians see are for vaccinations, including a rabies vaccination.

45. The cost of each rabies shot is approximately 60 cents per shot.

46. The cost to the companion animal owner is approximately \$15 to \$35.

47. The three veterinarian members of the Connecticut Board of Veterinary Medicine have a financial interest in providing as many vaccinations as possible. The individual members are using the Connecticut Board of Veterinary Medicine as a trade association, in order to protect the financial interest of veterinarians in general regarding vaccinations, by displacing the Plaintiff from the market for companion animal vaccination services.
48. By seeking to prohibit Plaintiff's vaccination procedures, the Defendant Veterinary Board and the three veterinarian defendants are seeking to displace the Plaintiff from the market for companion animal vaccination services.
49. Beginning approximately December 1, 2012, when Plaintiff's franchise was terminated by Banfield, and continuing through the present, Defendants have combined and conspired among themselves and with others to restrain competition in and to monopolize the practice of veterinary medicine, specifically the companion animal vaccination practice within the relevant market, in violation of §§ 1 and 2 of the Sherman Act.
50. The three veterinarian defendants, have attempted to monopolize the relevant market by the acts described in this complaint and restrain trade, all with the specific intent of weakening or eliminating competition from Plaintiff, and the defendant Connecticut Board of Veterinary Medicine has conspired in that attempt and has been used as a trade association instead of a regulatory agency of the state. The three veterinarian defendants, on their own behalf and using the

Connecticut Board of Veterinary Medicine as a trade association on behalf of other dentists with the same vaccination practices, can dominate both the practice of medicine in the relevant market by excluding anyone they wish from the market through disciplinary proceedings. By reason of such dominance, and by reason of their predatory practices described above, defendants' attempt to monopolize the relevant market has a dangerous probability of success without injunctive relief from this federal Court.

51. The defendants, individually and acting as the Connecticut Board of Veterinary Medicine, have shown their intent to dominate the market and restrain trade, during the currently ongoing hearing into Plaintiff's medical license, to wit individual defendant members of the Connecticut Board of Veterinary Medicine have stated the following during the proceedings against Dr. Robb:

a. "We are not an investigatory body trying to assess the merits of your research. We're not even really interested in your opinions on your own research." *Veterinary Board Hearing Transcript, January 7, 2015, at page 119:12-16.*

b. "This is not a board that is going to review veterinary practices in the state of Connecticut, all right." *Veterinary Board Hearing Transcript, January 7, 2015, at page 120: 3-7.*

c. "We have here an allegation that you administer or had your [staff] administer half doses of rabies serum, okay? . . . Now, that's either true or not true. If 's [sic] true, the reasons why you did it are not really anything

we care about.” *Veterinary Board Hearing Transcript, January 7, 2015, at page 120: 6-11.*

d. “We’re only trying to ascertain whether you broke the . . . the directive that you’re supposed to administer a full dose. Either it’s true or it’s not. Anything else is irrelevant to this hearing. All right. . . . You can’t disagree.” *Veterinary Board Hearing Transcript, January 7, 2015, at page 121: 12-20.*

e. After the Plaintiff stated, “I’m not going to injure [a] pet because the State Statute says to do it,” an individual defendant Board member replied, “Then you shouldn’t be practicing medicine, okay.” *Veterinary Board Hearing Transcript, January 7, 2015, at page 122: 19-24.*

52. By displacing the Plaintiff from the market for companion animal vaccination services, the Defendant Veterinary Board will be injuring consumers by removing a safer vaccination method from the market.

53. Defendants have further restrained trade and attempted to monopolize the relevant market by defaming Plaintiff’s skill and qualifications as a physician within the relevant market.

54. Defendants have further restrained trade by ignoring Conn. Gen. Stat. § 20-204(a), which requires that investigations by the Defendant Veterinary Board “be concluded not later than twelve months from the date the allegation is submitted to the department,” to wit:

- a. The investigation began in December of 2012;
- b. Charges were brought 20 months later in on August 28, 2014.

55. The Defendant Veterinary Board does not qualify for a state action defense from this anti-trust claim nor is it reasonably related to any efficiencies or other benefits sufficient to justify its harmful effect on competition.
56. The exclusionary course of conduct by the Defendant Veterinary Board in seeking to exclude Dr. Robb from the market, as alleged in this Complaint may be expected to continue in the absence of effective relief. As a consequence of the challenged actions and course of conduct of the Defendant Veterinary Board, the availability of Dr. Robb and safer vaccination procedures will be eliminated.
57. The challenged actions and course of conduct of the Defendant Veterinary Board have had and will have the effect of restraining competition unreasonably and injuring consumers in the following ways, among others:
- a. preventing and deterring safer vaccination procedures in Connecticut;
 - b. depriving consumers of the benefits of price competition from the services of Dr. Robb; and
 - c. reducing consumer choice in Connecticut for the provision of veterinary medical services by excluding Dr. Robb and his safer vaccination procedures.
58. Any adverse action against Dr. Robb by the Defendant Veterinary Board allows Banfield to attempt to use the adverse action

against Dr. Robb in the Banfield federal case, presently pending in this Court. See, *Charter Practices, Int'l., LLC, et al. [Banfield] v. John M. Robb, DVM* (Case No. 3:12-cv-1768(RNC)). In that case Banfield disclosed that its hospitals have had 6 deaths from anaphylaxis and over 300 cases of anaphylaxis since 2010 and Dr. Robb has had 0 in the same time period because of his reduced volume vaccination procedures.

59. Plaintiffs lack an adequate remedy at law in connection with Defendant's continuing the illegal disciplinary proceeding and further by the Defendants taking any illegal disciplinary action against Plaintiff, as Dr. Robb's livelihood is at stake.

60. In the said Banfield federal case, Dr. Robb has an economic expert (Dr. Gary Crakes, PhD.) who puts his economic claims at 6.5 million dollars against Banfield, which damage claim against Banfield will be put in jeopardy by any adverse action of the Defendant Veterinary Board against Dr. Robb.

61. Plaintiff has exhausted the administrative process, as Dr. Robb's Motion to Dismiss the charges pending against him was denied by the Defendant Veterinary Board. In Defendants' decision, they refused to address their fatal flaw under the anti-trust laws: when a majority of the members of an administrative agency board is made up of active members of the profession that the board is regulating, this is a structural violation of the anti-trust laws and has an anti-competitive

impact unless the administrative agency board is directly supervised by a state official who can change, modify or reject the decision.

62. The Defendant Veterinary Board as statutorily constituted violates the anti-trust laws, as it is comprised of a majority of market participants and it does not have any supervisory state official who can change, modify or reverse its decisions against Dr. Robb.
63. In the presently pending disciplinary proceeding, which seeks to exclude Dr. Robb from the Connecticut market, the Defendants are restraining trade and seek to dominate the market as a trade association on behalf of other veterinarians, eliminating competition.
64. Plaintiff has suffered damages.

VI. JURY DEMAND

Plaintiff demands trial by jury pursuant to Rule 38 (b) of the Federal Rules of Civil Procedure.

VII. Prayer for Relief

Wherefore, Plaintiff demands judgment against the Defendants as follows:

1. That a temporary restraining order enter against the Defendants and they be enjoined from proceeding with their disciplinary hearing June 15, 2015, and their case against the plaintiff and further be enjoined from taking any illegal disciplinary action against Plaintiff as alleged in this Complaint, pending the hearing on the temporary injunction;
2. That temporary and permanent injunctions enter against the Defendants and they be enjoined from proceeding with their disciplinary hearing and case against the plaintiff and further be enjoined from taking any illegal disciplinary action against Plaintiff as alleged in this Complaint;
3. Compensatory Damages per the anti-trust statute;
4. Treble the amount of actual damages sustained, together with lawful accrued interest thereon, costs and attorneys fees per the anti-trust statute;
5. All other relief, whether in law or equity, deemed just by the Court and/or jury.

Dated at Brookfield, Connecticut this 10th day of June, 2015.

Respectfully Submitted,
Plaintiff John M. Robb, DVM,



By: _____

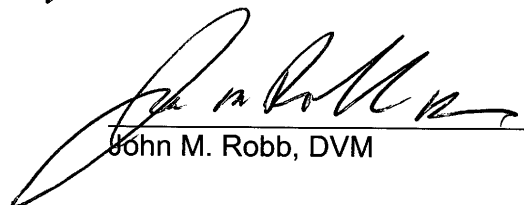
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VERIFICATION

I, Plaintiff, John M. Robb, DVM, have read the foregoing Plaintiff's Verified Complaint, and know the factual basis of the allegations and contents of this verified complaint and state that they are true based on my personal knowledge, except as to those matters stated to be based on information and belief, and as to those matters, I believe them to be true.

Pursuant to Section 1746 of Title 28 of the United States Code, I declare under penalty of perjury that the foregoing is true and correct.

Executed at Brookfield, Connecticut, this 10TH day of June, 2015.


John M. Robb, DVM