

## Burgos, Alexander N

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**Subject:** FW: [External] LETTERS OF OBJECTIONS TO RULES REQUESTING LEGISLATIVE REVIEW From veterinarians  
**Attachments:** 12 letters of objection from veterinarians to Facility Permit rules and Continuing Education Rule, 1.pdf

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**From:** Rules, Oah <oah.rules@oah.nc.gov>  
**Sent:** Wednesday, July 26, 2023 12:50 PM  
**To:** Burgos, Alexander N <alexander.burgos@oah.nc.gov>  
**Cc:** Ascher, Seth M <seth.ascher@oah.nc.gov>  
**Subject:** FW: [External] LETTERS OF OBJECTIONS TO RULES REQUESTING LEGISLATIVE REVIEW From veterinarians

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Re: LETTERS OF OBJECTIONS TO RULES REQUESTING LEGISLATIVE REVIEW  
Proposed amendments to 21 NCAC 66 .0206 (Minimum Standards for Continuing Education)  
Proposed adoption of 21 NCAC 66 .0902 (Veterinary Facility Permits)  
Proposed adoption of 21 NCAC 66 .0903 (Supervising Veterinarian)  
Proposed adoption of 21 NCAC 66 .0904 (Discipline Veterinary Facility Permits)

Members of the Commission:

I serve as counsel to the NC Veterinary Medical Association. Attached please find my letter enclosing twelve (12) letters of objection to the rules referenced above, as adopted by the NC Veterinary Medical Board at its July 6, 2023 meeting.

The original of the letter with the letters of objection will be mailed to the Commission.

Thank you for your consideration.

Jon Carr

Jon P. Carr, Attorney at Law  
Partner  
NCDRC Certified Superior Court Mediator



1951 Clark Avenue | P.O. Box 10669 | Raleigh, North Carolina 27605  
919-831-4473 (Direct) | 919-828-2501 (Main) | 919-834-8447 (Fax) | [jcarr@jordanprice.com](mailto:jcarr@jordanprice.com)

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July 26, 2023

Via email:  
[oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

Original via Post:

Office of Administrative Hearings  
N.C. Rules Review Commission  
1711 New Hope Church Rd.  
Raleigh, NC 27609

Re: LETTERS OF OBJECTIONS TO RULES REQUESTING LEGISLATIVE REVIEW  
Proposed amendments to 21 NCAC 66 .0206 (Minimum Standards for Continuing Education)  
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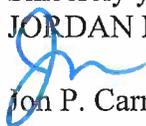
Members of the Commission:

I serve as counsel to the NC Veterinary Medical Association. Enclosed please find twelve (12) letters of objection to the rules referenced above, as adopted by the NC Veterinary Medical Board at its July 6, 2023 meeting. I understand that these rules have since been submitted by NC Veterinary Medical Board to the Rules Review Commission.

Each of the enclosed letters of objection request that the above rules be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. and further request that the rules be subject to a delayed effective date as set out in that same provision.

Each of the letters of objection are signed by members of the Board of Directors of the NC Veterinary Medical Association, and I am hereby submitting the enclosed letters of objection on behalf of the doctors of veterinary medicine who signed the enclosed letters.

Thank you for your consideration.

Sincerely yours,  
JORDAN PRICE WALL GRAY JONES & CARLTON  
  
Jon P. Carr

Enc.  
cc: Board of Directors, NC Veterinary Medical Association  
Seth M. Ascher, Counsel to the North Carolina Rules Review Commission (via email)

Shannon Bass DVM  
3513 Kendale Ave NW  
Concord, NC 28027

July 18, 2023

[oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

N.C. Rules Review Commission  
1711 New Hope Church Rd.  
Raleigh, NC 27609

Re: Proposed amendments to 21 NCAC 66 .0206 (Minimum Standards for Continuing Education)  
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Members of the Commission:

I request that the above rules be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rules be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

Shannon Bass DVM



Dr. Holly Capps  
106 West 2<sup>nd</sup> Street  
P.O. Box 1018  
Princeton, NC 27569

July 21, 2023

[oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

N.C. Rules Review Commission  
1711 New Hope Church Rd.  
Raleigh, NC 27609

Re: Proposed amendments to 21 NCAC 66 .0206 (Minimum Standards for Continuing Education)  
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Thank you for your consideration.

Holly Capps

A handwritten signature in black ink that reads "Holly Capps". The signature is written in a cursive, flowing style with a large initial "H" and a stylized "C".

Melina Efthimiadis, DVM  
Roxboro Animal Hospital  
585 Patterson Drive  
Roxboro, NC 27573

7/19/2023

[oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

N.C. Rules Review Commission  
1711 New Hope Church Rd.  
Raleigh, NC 27609

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Thank you for your consideration.

Melina Efthimiadis, DVM



Dr. Marguerite Gleason  
4931 Windchase Lane  
Charlotte, NC 28269

July 18, 2023

[oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

N.C. Rules Review Commission  
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Thank you for your consideration.

A handwritten signature in cursive script that reads "Marguerite Gleason, DVM".

Marguerite Gleason, DVM

President NCVMA

Dante Martin DVM  
324 US Hwy 17 N  
Holly Ridge, NC 28445

18 July 2023

[oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

N.C. Rules Review Commission  
1711 New Hope Church Rd.  
Raleigh, NC 27609

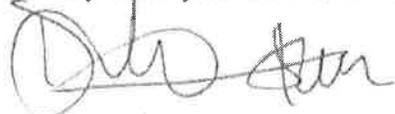
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Thank you for your consideration.

A handwritten signature in black ink, appearing to read 'Dante Martin', written over a horizontal line.

Dante Martin DVM

Donna McLamb DVM  
304 N.White Street, PO Box 1356 Dobson NC 27017

July 19,2023

[oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

N.C. Rules Review Commission  
1711 New Hope Church Rd.  
Raleigh, NC 27609

Re: Proposed amendments to 21 NCAC 66 .0206 (Minimum Standards for Continuing Education)  
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Thank you for your consideration.

Donna McLamb DVM

A handwritten signature in cursive script that reads "Donna McLamb DVM".

Eliza Ruffner  
242 Dallas Drive  
Wilmington, NC 28405

July 20, 2023

[oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

N.C. Rules Review Commission  
1711 New Hope Church Rd.  
Raleigh, NC 27609

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Thank you for your consideration.

Eliza Ruffner, DVM

*Eliza K. Ruffner*

Jennifer Jones Shults, DVM, CCRT, CVSMT  
6910 Carpenter Fire Station Rd, Ste 101  
Cary, NC 27519

July 18, 2023

[oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

N.C. Rules Review Commission  
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Thank you for your consideration.

Jennifer Jones Shults, DVM, CCRT, CVSMT



4883-0769-3681, v. 1

**Karyn Smith, DVM  
3911 W Durant Ct.  
Wilmington, NC 28412**

July 19, 2023

[oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

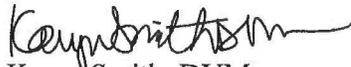
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Thank you for your consideration.

  
Karyn Smith, DVM

4883-0769-3681, v. 1

Sandra Strong, DVM  
Diplomat American College of Animal Welfare  
3501 Trenton Rd  
Raleigh, NC 27607

July 18, 2023

[oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

N.C. Rules Review Commission  
1711 New Hope Church Rd.  
Raleigh, NC 27609

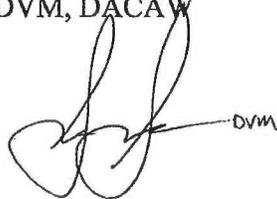
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Thank you for your consideration.

Sandra Strong, DVM, DACAW

A handwritten signature in black ink, appearing to be 'S Strong', with a horizontal line extending to the right and the letters 'DVM' written in small capital letters at the end of the line.

4883-0769-3681, v. 1

Brian D. Stuber, DVM  
2736 Graves Drive  
Goldsboro, NC 27534

July 20, 2023

[oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

N.C. Rules Review Commission  
1711 New Hope Church Rd.  
Raleigh, NC 27609

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Thank you for your consideration.

Brian D. Stuber, DVM



Erin Purvis, DVM  
136 Culpepper Ln  
Weaverville, NC 28787

July 26th, 2023

[oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

N.C. Rules Review Commission  
1711 New Hope Church Rd.  
Raleigh, NC 27609

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Thank you for your consideration.

Erin Purvis, DVM

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4883-0769-3681, v. 1