

BEFORE THE IOWA BOARD OF VETERINARY MEDICINE

IN THE MATTER OF:)	CASE NO. 24-016
)	
KATHERINE SCHWARTZ, R.V.T.,)	COMBINED STATEMENT OF
)	CHARGES, SETTLEMENT
RESPONDENT.)	AGREEMENT, AND FINAL ORDER

COME NOW the Iowa Board of Veterinary Medicine (“Board”) and Katherine Schwartz, R.V.T. (“Respondent”), and hereby enter into this Combined Statement of Charges, Settlement Agreement and Final Order (“Agreement”) pursuant to Iowa Code sections 17A.10(2) and 272C.3(4), and 811 Iowa Admin. Code 10.9.

A. STATEMENT OF CHARGES

1. Respondent was issued a certificate of registration (No. AT-1292) for a Registered Veterinary Technician (“RVT”) on May 2, 2023. Certificates of registration for a RVT that were issued prior to July 1, 2024, do not expire.
2. The Board has jurisdiction in this matter pursuant to Iowa Code chapters 17A, 169 and 272C.

Count I

3. Respondent is charged with knowingly making misleading, deceptive, untrue, or fraudulent representation in the practice of the profession in violation of Iowa Code section 169.13(1)(a).

Count II

4. Respondent is charged with being guilty of a willful or repeated departure from, or the failure to conform to, the minimal standard of acceptable and prevailing practice of veterinary medicine as defined in rules adopted by the board, in which proceeding

actual injury to an animal need not be established; or the committing by a veterinarian of an act contrary to honesty, justice, or good morals, whether the act is committed in the course of the practice or otherwise, and whether committed within or without this state in violation of Iowa Code section 169.13(1)(g).

Count III

5. Respondent is charged with the inability to practice veterinary medicine with reasonable skill and safety by reason of illness, drunkenness, excessive use of drugs, narcotics, chemicals or other type of material or as a result of a mental or physical condition, in violation of Iowa Code section 169.13(1)(h).
6. 811 Iowa Administrative Code 10.6(1)(c) provides that the Board may “mandate a credential holder’s completion of a treatment program as a condition of probation or suspension.”

B. FACTUAL CIRCUMSTANCES

7. A complaint was received by the Board alleging that Respondent had taken prescription drugs from a veterinary clinic where Respondent had been employed.
8. The Board conducted an investigation into the complaint, and, as part of its standard protocol, medical records were received and reviewed by the Board.
9. The investigation revealed that Respondent repeatedly took prescription drugs from the clinic for personal use, including: codeine; zorbium; and hydrocodone.
10. Several other signs of possible substance abuse by Respondent were discovered during the investigation, including deleting security camera footage from the clinic and stealing a key to a safe at the clinic containing prescription drugs.
11. Respondent was charged with unlawful possession of a prescription drug, a serious

misdemeanor, and pleaded guilty to the charge on October 25, 2025. Respondent received a deferred judgment and is placed on probation for one (1) year.

12. Respondent admits to the allegations contained in this Combined Statement of Charges, Settlement Agreement and Final Order.

C. SETTLEMENT AGREEMENT AND FINAL ORDER

13. Respondent's certificate of registration shall be put on probation for the duration of Respondent's criminal case probation, which is scheduled to end in approximately October 2025. While on probation, Respondent shall submit quarterly reports to the Board (on July 5, 2025, and October 5, 2025) which include information regarding his/her compliance with this Agreement as set forth in the attached quarterly report template (Attachment A).
14. Respondent shall not consume alcohol, deviate from the therapeutic use of prescribed medications, or use illicit drugs. Respondent shall immediately provide body fluid specimens upon request of the Board or its designee. While Respondent's certificate of registration is on probation, Respondent agrees to the following drug testing protocol:
 - a. Respondent shall fully cooperate with random testing through an automated notification system via RecoveryTrek;
 - b. Respondent shall sign all necessary releases with RecoveryTrek to assure the Board may communicate directly with RecoveryTrek concerning Respondent's participation;
 - c. Respondent shall sign all necessary releases with RecoveryTrek to assure the Board that it can have access to all of Respondent's drug testing results;
 - d. Respondent agrees to submit to random testing on a monthly basis for the duration of Respondent's probation for the conviction, which is scheduled to end in approximately October 2025;

- e. The monthly testing shall commence during the month following the Board's approval of this Agreement;
- f. If a test result shows Respondent tested positive for any substance identified in subparagraph (g) of this section, the Board may take additional disciplinary action;
- g. Test Panels will meet the requirements for testing a wide array of drugs of abuse, including alcohol and opiates; and
- h. All costs of chemical screening shall be paid by Respondent.

Respondent shall complete any agreement or contract with RecoveryTrek necessary for the drug testing outlined herein within thirty (30) days from the date the Board approves this Agreement.

- 15. This Combined Statement of Charges, Settlement Agreement and Final Order constitutes the resolution of a contested case proceeding.
- 16. By entering into this Agreement, Respondent voluntarily waives any rights to a contested case hearing on the allegations contained in the Agreement and Order and voluntarily waives any objections to the terms of the Agreement and Order, including the right to appeal.
- 17. This Agreement and Order is voluntarily submitted by Respondent to the Board for consideration.
- 18. Respondent acknowledges they have a right to be, and is, represented by counsel in this matter.
- 19. Respondent agrees that counsel for the State may present this Agreement and Order ex parte to the Board.
- 20. This Agreement and Order is subject to approval of the Board. If the Board fails to approve this Agreement and Order it shall be of no force or effect to either party.
- 21. This Agreement and Order shall be part of Respondent's permanent record and shall

be considered by the Board in determining the nature and severity of any disciplinary action to be imposed in the event of any future violation.

22. In the event Respondent violates or fails to comply with any of the terms of this Agreement and Order, the Board may initiate appropriate action to revoke or suspend Respondent's certificate of registration or to impose other licensee discipline in accordance with Iowa Code section 272C.3(2)(a).
23. This Agreement and Order is a public record available for inspection and copying upon execution of the Agreement and Order in accordance with the requirements of Iowa Code chapter 22 and 272C.
24. The Board's approval of this Agreement and Order shall constitute a FINAL ORDER of the Board.

WHEREFORE, the terms and conditions of this Combined Statement of Charges, Settlement Agreement, and Final Order are agreed to and accepted by the Iowa Board of Veterinary Medicine and the Respondent.

Respondent

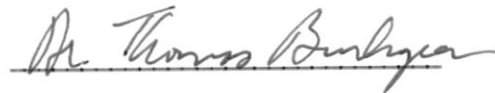


KATHERINE SCHWARTZ, R.V.T.

4-18-25

Date

Iowa Board of Veterinary Medicine



CHAIRPERSON

4/24/2025

Date

Copies to:

Jacob J. Larson
Assistant Attorney General
Office of Iowa Attorney General
Hoover State Office Building
1305 E. Walnut Street
Des Moines, Iowa 50319
Phone: (515) 281-5341
Fax: (515) 281-6771
E-mail: jacob.larson@iowa.gov
ATTORNEY FOR THE IOWA BOARD
OF VETERINARY MEDICINE

LEON F. SPIES
312 E. COLLEGE STREET, SUITE 216
IOWA CITY, IOWA 52240
PHONE 319.337.4193
FAX 319.337.2396
E-mail: spies@spiespavelich.com
ATTORNEY FOR RESPONDENT