Ontario
Racing
Commission

RULING NUMBER COM TB 016/2012

COMMISSION HEARING TORONTO, ONTARIO – OCTOBER 24, 2012

IN THE MATTER OF THE RACING COMMISSION ACT S.O. 2000, c.20;

AND IN THE MATTER OF THE APPEAL AND REQUEST FOR HEARING OF MASTERFEEDS

AND IN THE MATTER OF THOROUGHBRED LICENSEE ROBERT EARL BARNETT

On November 19, 2010, the horse, "La Gran Ruby (tattoo #G28109)", trained by Robert Earl Barnett ("BARNETT"), licence #121763, participated in the third race at Woodbine and finished second.

On December 1, 2010, the Stewards received notification of a positive analysis for La Gran Ruby for the Class III drug, Ractopamine.

On September 24, 2011, the Stewards issued Ruling Number TB 6926/11, wherein BARNETT was rendered blameless for the positive test of La Gran Ruby on November 19, 2010 but, given the absolute liability nature of the Trainer Responsibility Rule, the horse was disqualified, the purse redistributed, and the positive test remained on BARNETT'S record.

On November 7, 2011, Masterfeeds Inc. ("MASTERFEEDS") appealed Ruling Number TB 6926/11.

On February 7, 2012, a Notice of Hearing was issued to notify the parties that the appeal would be heard on April 17, 2012.

On March 30, 2012, the parties sought a consent adjournment of the April 17, 2012 Hearing date on the basis of the need to schedule a two-day Hearing.

On April 2, 2012, a Notice of Hearing was issued to notify the parties that the appeal would be heard on June 13 and 14, 2012.

On June 8, 2012, the Hearing was adjourned on consent to October 24 and 25, 2012.

On October 24, 2012, a Panel of the Ontario Racing Commission consisting of Vice Chair Hon. James M. Donnelly, and Commissioners John Macdonald and Brenda Walker was convened to hear this matter.

John Downing appeared as counsel on behalf of MASTERFEEDS. Dan McMahon attended as counsel on behalf of BARNETT. Jennifer Friedman appeared as counsel for the Administration of the ORC.

At the outset of the Hearing, counsel presented to the Panel an Agreed Statement of Facts and Joint Submission on Disposition pertaining to MASTERFEEDS and the Administration of the ORC.

The Panel approved the Agreed Statement of Facts and Joint Submission on Disposition as between MASTERFEEDS and the Administration of the ORC as follows:

> The appeal is allowed and Ruling Number TB 6926/11 as it pertains to MASTERFEEDS is set aside and a declaration issued that MASTERFEEDS and Nobelton's products were not contaminated with Ractopamine and were not the source of La Gran Ruby's positive urine test for Ractopamine.

Thereafter, Vice Chair Hon. James M. Donnelly held a Pre-Hearing Conference with BARNETT and the Administration of the ORC.

Following the Pre-Hearing Conference, counsel on behalf of BARNETT and counsel on behalf of the Administration of the ORC presented a Joint Submission on Disposition pertaining to BARNETT and the Administration of the ORC.

The Panel approved the Joint Submission on Disposition as between BARNETT and the Administration of the ORC and ordered the following penalty:

i) $5,000 fine, with $3,500 stayed, payable within 15 days;

ii) 1 year probation with the following standard terms pursuant to Policy Directive No. 3-2008:

1. The Licensee shall keep the peace and be of good behaviour;

2. The Licensee shall allow Commission investigators access to his stabling area at any time to conduct unannounced random searches for illegal or non-therapeutic medications or drugs;

3. The Licensee shall allow Commission investigators to seize any illegal or non-therapeutic medications or drugs found at his stabling area;

4. The Licensee shall be subject to the Commission's Out of Competition Program.

5. The Licensee may be subject to a Notice of Proposed Order in addition to any penalty imposed by the ORC Judges or Stewards for any breach of the terms of his licence.

iii) If BARNETT has a further positive during the probation period, the amount of the stay ($3,500) shall be added to any other subsequent Ruling that might be issued.

The transcript of the Panel's Oral Decision and the Agreed Statement of Facts and Joint Submission on Disposition are attached to this Ruling.

DATED at Toronto this 14th day of November 2012.

BY ORDER OF THE COMMISSION

Steven Lehman
Executive Director

ONTARIO RACING COMMISSION

THOROUGHBRED HEARING

IN THE MATTER OF AN APPEAL AND REQUEST FOR HEARING OF

MASTERFEEDS/ROBERT BARNETT

Held Before:

James Donnelly, Vice Chairman

John Macdonald, Commissioner

Brenda Walker, Commissioner

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These are an excerpt of the proceedings in the above mentioned matter held before The Ontario Racing Commission, Re: **MASTERFEEDS/ROBERT BARNETT**, taken before Toronto Court Reporters, Suite 1410, 65 Queen Street West, Toronto, Ontario, at 10 Carlson Court, Suite 400, Toronto, Ontario, on the 24th day of October, 2012.

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Appearances:

Jennifer Friedman, counsel for the Ontario Racing Commission Administration

Dan McMahon, counsel for the licensees Barnett

John Downing, counsel for Masterfeeds

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Hearing continued ...

MR. CHAIRMAN: The panel accepts the agreed statement of facts and the joint disposition worked out by counsel and an order will issue in accordance with that disposition. I'm reading from Exhibit number 10: "The appeal is allowed and ruling number TB6926/11 as it pertains to Masterfeeds is set aside and a declaration issued that Masterfeeds and Nobelton's products were not contaminated with Ractopamine and were not the source of LA GRAN RUBY's positive urine test for Ractopamine and I point out specifically that the appeal is allowed as it pertains to Masterfeeds and the allowance is restricted to that. Anything further counsel?

MS. FRIEDMAN: No, thank you.

MR. CHAIRMAN: Thank you. You may be excused, counsel. Thank you very much.

MR. DOWNING: Thank you.

MR. CHAIRMAN: We will give you a minute to vacate.

SHORT RECESS

Upon Resuming...

Hearing continued ...

MR. MACDONALD: Thank you. I understand the pre-trial conference was successful in resolving this matter.

MR. MCMAHON: Yes, it was. It was very straight forward.

MR. MACDONALD: I've very pleased with that and we will so order on the basis of the $5,000.00 fine, the $3,500.00 of it which is stayed, the one year probation period, probation is to start immediately under the standard terms and ORC policy 3/2008 plus the indication that if the licensee has a further positive during the probation period the amount of the stay, the $3,000.00, would be added to any other subsequent penalty that might be issued.

MS. WALKER: $3,500.00.

MR. MACDONALD: $3,500.00, sorry.

MS. FRIEDMAN: And if I could just add in a situation where there isn't a penalty if we could revise that wording to any subsequent ruling as opposed to any subsequent penalty?

MR. MACDONALD: That may be a distinction without a difference but I understand what you are saying. That's fine, any subsequent ruling.

MS. FRIEDMAN: Thank you.

MR. MCMAHON: I'd just like to note if Mr. Barnett will be able to pay that fine within fifteen days. He probably doesn't require fifteen days, it is just mechanically how things are brought about. It is his intention to attend to the amount immediately but he can't do it today but just so there is no misunderstanding with the Administration policy that he gets to do it in a timely fashion that would be acceptable with the caveat that it's with a cheque that clears and is cash is accepted.

MS. FRIEDMAN: The Administration is content with that. In fact, it would request that in the content of the ruling itself if we could indicate that it is to be payable within fifteen days.

MR. MACDONALD: Thank you, so ordered. This matter is now terminated. Thank you.

CERTIFIED CORRECT_____

RAYMOND P. MACDONALD, B.A., CVR
Commissioner of Oaths

IN THE MATTER OF THE RACING COMMISSION ACT S.O. 2000, c. 20

IN THE MATTER OF THE APPEAL AND REQUEST FOR HEARING OF MASTERFEEDS INC.

AND IN THE MATTER OF ROBERT EARL BARNETT

AGREED STATEMENT OF FACTS

The Administration of the Ontario Racing Commission ("ORC") and Masterfeeds Inc., ("Masterfeeds") having been advised by legal counsel, agree to the following facts in relation to the appeal of Ruling Number TB 6926/11:

The Positive Test:

1. On November 19, 2010, the horse, La Gran Ruby ("La Gran Ruby", tattoo #G28109), trained by Robert Earl Barnett (licence #121763, "Barnett"), participated in the third race at Woodbine and finished second.

2. Following the race, La Gran Ruby was selected by the Stewards for testing.

3. A urine sample was taken from La Gran Ruby, sealed with tag #446817 EIPH, and sent to Maxxam Laboratories ("Maxxam") for analysis.

4. On December 1, 2010, the Stewards received notification of a positive analysis for the class III drug, Ractopamine, for La Gran Ruby.

5. Canadian Pari-Mutual Agency, Schedule of Drugs 2011, Agriculture and Agri-Food Canada provides: "Agriculture and Agri-Food Canada, through the Drug Control Surveillance Program of the Canadian Pari-Mutuel Agency (CPMA), conducts research into equine drug administration, a program designed to aid the racing industry". Ractopamine is included in its Schedule – List of Drugs.

6. On December 3, 2010, the Stewards notified Barnett of the positive test.

7. On December 3, 2010, the Stewards issued Ruling Number TB 6926/10 wherein La Gran Ruby was placed on the Stewards' list and rendered ineligible to enter or race in Ontario for 90 days pursuant to Rules 15.04.04, 16.11 and 16.11.01 of the Rules of Thoroughbred Racing ("TB Rules").

ORC Investigation

8. Following the notification of a positive test, an ORC investigation commenced.

9. On December 3, 2010, ORC investigators attended at Barnett's barn to conduct a search in the presence of Barnett. All medications were properly labeled and stored.

Samples of Brooks, Nobleton and Purina feeds were seized, photographed, and assigned exhibit numbers.

10. On December 3, 2010, the ORC sent to Maxxam for analysis for Ractopamine the following, which were seized during the ORC's search of Barnett's barn:

    i) Bag containing Nobleton Complete Feed (ID: 0419A-02) ("Complete Feed"); and,

    ii) Bag containing Brooks Phase 3 Feed (ID: 0419A-01) ("Brooks Phase 3 Feed").

11. On December 3, 2010, ORC Investigator Rick Grant ("Grant") and Senior Judge Miller ("Miller") interviewed Barnett. Among other things, BARNETT indicated the following:

    a) Licensed as a thoroughbred trainer since 1968;

    b) La Gran Ruby's diet consists of sweet-feed, crunch, oats, and occasionally salt and flax seed;

    c) La Gran Ruby gets three meals a day and nothing is added to the feed;

    d) La Gran Ruby is a sound, strong filly; occasionally receives bute, robaxin and she is on Lasix;

    e) La Gran Ruby has been consistent and in the money all year;

    f) Dr. Daniel Colangelo ("Dr. Colangelo") is La Gran Ruby's veterinarian, and he has been BARNETT's veterinarian for ten years;

    g) He keeps a log of all veterinary work;

    h) No security at his barn;

    i) No enemies; gets along with everyone;

    j) Does not believe anyone would tamper with La Gran Ruby; and

    k) Had one past positive test.

12. On December 4, 2010, Grant met with veterinarian, Dr. Colangelo. Dr. Colangelo furnished Grant with the list of medications that he had administered to La Gran Ruby during the 2010 race season.

13. On December 4, 2010, Grant met with Omar Atkinson and Adrian Falconer, who are licensed by the ORC as grooms, and worked in this capacity for Barnett.

14. On December 10, 2010, Grant spoke with Dave Budweth ("Budweth"), one of the owners of Nobleton Feed Mill ("Nobleton"), which mill is one of the locations where Barnett obtained his horse feed. Budweth indicated, among other things, that:

a) The mill does not make swine feed;

b) The mill does not carry swine feed;

c) All of their feeds are natural;

d) No medications are added to their feeds;

e) 90% of their business is equine related;

f) Nobleton's business is controlled by the Canadian Food Inspection Agency ("CFIA");

g) CFIA requires them to retain samples of their mixes; and,

h) He would check to see when Barnett received his bags of feed just prior to the positive test, and would send samples of the Complete Feed for analysis.

15. On December 13, 2010, Grant received a call from Budweth who indicated the following:

a) He had contacted Masterfeeds who supply the supplements that are added to the ingredients that Nobleton uses in the Complete Feed;

b) Daco, a subsidiary of Masterfeeds, located in Stratford, Ontario runs the drug Ractopamine in some of their products;

c) Daco ran Ractopamine through their plant about one month prior to La Gran Ruby's positive test;

d) Masterfeeds had told Budweth that, after the use of Ractopamine, they run at least 10 tonnes of non-medicated feed through the mill to flush the system to prevent cross-contamination; and,

e) Despite the comments of Masterfeeds, Budweth would still send the Nobleton samples off for analysis.

16. On December 13, 2010, Grant contacted Brooks Feed Mill, located in Port Perry, Ontario ("Brooks"). Brooks is the second location where Barnett purchased horse feed. Grant spoke with Ron Dean of Brooks ("Dean"). Dean indicated that:

a) They have never used Ractopamine;

b) The supplements that the mill adds into the Brooks Phase 3 Feed came from Kentucky Equine Research Supplements; and,

c) The mill will not allow their feed to be shipped in a truck or trailer that has previously carried cattle or swine feed.

17. On December 15, 2010, Grant spoke with Mark Carew of Masterfeeds located in Cavan, Ontario ("Carew"). Carew indicated that:

a) The mill last used Paylean on December 3, 2009 when 2250 grams was put through the system;

b) After the Paylean went through the system, they followed it with an initial flush with non-medicated feed, and at least a second non-medicated flush; and,

c) Equine feed will only go through the system after at least five runs of non-medicated feed.

18. On December 21, 2010, Grant spoke with Bill Kittmer, Director of Operations for Masterfeeds ("Kittmer"). Among other things, Kittmer indicated the following:

a) They did not use Paylean around the dates of the positive test;

b) At their Daco plant, Masterfeeds uses Optaflexx, which is a trade name for Ractopamine;

c) Optaflexx is used in the production of cattle feed;

d) The production runs of Premix that were incorporated into the Complete Feed sold to Barnett took place on June 18, July 8, and October 1, 2010;

e) Flushing protocol for Premix production is that at least seven runs of non-medicated feed will be run through the system;

f) Masterfeeds had checked its records for the three dates to find out how many runs of feed went through the system before running the Premix that Masterfeeds supplied to Nobleton:

- Prior to the June 18 production run, there were thirty runs of non-medicated feed after the most recent use of Optaflexx;

- Prior to the July 7 production run, there were eighty-two runs of non-medicated feed after the most recent use of Optaflexx; and,

- Prior to the October 1 production run, there were one hundred and sixty-four runs of non-medicated feed after the most recent use of Optaflexx;

g) Masterfeeds sent samples of the subject Nobleton Complete Feed and samples of the subject Premix to the University of Guelph for analysis; and,

h) Upon receipt, Masterfeeds would forward the results to Grant.

19. On December 23, 2010, Dean of Brooks Feed Mill supplied Grant with a list of ingredients for the pre-mix that they receive from Kentucky Equine Research Supplements.

20. On December 23, 2010, Grant contacted Kentucky Equine Research Supplements, located in Versaille, Kentucky. They advised Grant that they only handle equine supplements, and have never used Ractopamine in any of their pre-mixes.

21. Masterfeeds and Nobleton determined which batches of the Complete Feed and Premix had been sold to Barnett. Masterfeeds sold to Nobleton a product known as Premix 801551M +V 220 Mineral & Vitamins premix for cattle and horses (the "Premix"). The Premix was incorporated into Nobleton's Complete Feed at a ratio of 6.3kg of Premix for 1,000 kg of the Complete Feed.

22. Samples were taken by Kittmer to Laboratory Services at The University of Guelph for testing. The samples included,

    i) two samples of Nobleton's Complete Feed labeled "2010 FAH NOV 10" and "2010 FAH NOV 4," which were taken from the production runs corresponding to the Complete Feed sold to Barnett; and

    ii) three samples of Masterfeeds' Premix labeled "18284 100930-1," 1716-100617-3," and "3791-100707-2," which were taken from the Masterfeeds production runs corresponding to the Premix sold to Nobleton and incorporated into the Complete Feed sold to Barnett.

23. On December 23, 2010, Grant received an electronic mail from Kittmer, which stated:

> Both samples are clean as neither Paylean or Optaflexx were detected. The assay report reads Paylean but it also covers Optaflexx as both products have the same active ingredient Ractopamine. I trust these assays give you the confidence in the Masterfeeds and Nobleton Feed mill equine products that you require for your investigation.

The feed assays were attached to the electronic mail.

24. The feed assays from the University of Guelph, reported December 23, 2010, and January 10, 2011, to the attention of Kittmer, for the product Paylean, enumerate an expected level of "0 ppm" and a result of "<1 ppm."

25. On January 10, 2011, Steven A. Barker, PhD, State Chemist and Professor and Director of the Equine Medication Suveillance Laboratory ("Dr. Barker") wrote to Lesley Barker of the Horsemen's Benevolent and Protective Association ("HBPA") regarding the urine split sample labeled #446817EIPH (LSU#ss00923), which was submitted to his laboratory for the drug, Ractopamine. Dr. Barker indicated that the urine sample was confirmed positive for Ractopamine of approximately 13.01ng/ml.

26. On March 2, 2011, Dr. Barker provided the following expert opinion to the HBPA: "if the feed was positive at less than 1 ppm for ractopamine, I would think it is certainly

a possible source and explanation for a urine finding in the low ppb range for ractopamine in a horse who consumed it".

Stewards' Hearing

27. On April 15, 2011, the Stewards held a hearing for Barnett.

28. The Stewards interpreted the feed assays from the University of Guelph (referred to in paragraph 23 above) to mean that "Ractopamine was detected" in the feed. However, in reality, as explained below, the tests did not detect any Ractopamine in the feed.

29. On April 29, 2011, the analysis report from Maxxam indicated a negative for Ractopamine in both the feed sample of Complete Feed and feed sample of Brooks Phase 3 Feed seized by the ORC during their search of Barnett's barn on December 3, 2010.

30. On September 24, 2011, the Stewards issued Ruling Number TB 6926/11 wherein Barnett was rendered blameless for the positive test of La Gran Ruby on November 19, 2010. Ruling Number TB 6926/11 suggested that Masterfeeds' equine feed products were contaminated with Ractopamine and were the most probable cause of La Gran Ruby's positive test. However, given the absolute liability nature of the Rule, the positive test will remain on Barnett's record, the horse was disqualified, and the purse redistributed.

31. Masterfeeds did not receive notice of the hearing and did not participate.

32. On October 11, 2011, Kittmer contacted Russ Fernandes, Assistant Manager of Racing at the ORC, regarding appealing Ruling Number TB 6926/11. Kittmer contacted the Stewards and indicated that he disagreed with Ruling Number TB 6926/11 because it suggested Masterfeeds' products were contaminated. The Stewards advised him that he could appeal Ruling Number TB 6926/11.

Appeal of Ruling Number TB 6926/11

33. On November 7, 2011, counsel on behalf of Masterfeeds wrote to the ORC to appeal Ruling Number TB 6926/11.

34. On November 17, 2011, counsel on behalf of the Administration of the ORC wrote to counsel on behalf of Masterfeeds to indicate that, despite launching its appeal outside of the prescribed timeframe, given that Masterfeeds did not receive a copy of the Ruling, it would not oppose Masterfeeds' standing to bring its appeal. Further, the Administration requested the availability of counsel in January through March of 2012 for the scheduling of the hearing of the Appeal (the "Hearing").

35. On January 6, 2012, counsel on behalf of Masterfeeds indicated that they were available for the Hearing on April 17, 2012.

36. On February 7, 2012, a Notice of Hearing was issued to notify the parties that the Hearing would be held on April 17, 2012.

37. On March 30, 2012, the parties sought a consent adjournment of the April 17, 2012 date on the basis of the need to schedule a two-day Hearing.

38. On April 2, 2012, a Notice of Hearing was issued to notify the parties that the Hearing would be held on June 13 and 14, 2012.

Expert Report of Dr. Barker:

39. On May 15, 2012, the Administration obtained and served the expert report of Dr. Steven A. Barker. Dr. Barker's expert report was further to the opinion he provided to the HBPA on March 2, 2011. Dr. Barker reviewed the test results and opined that the results indicated there was "a non-zero value for the presence/concentration of Ractopamine in the feed...that the feed was positive for this substance and, is thus a source for Ractopamine".

Expert Report of Louise Spilsbury:

40. On May 30, 2012, Masterfeeds served the expert report of Louise Spilsbury, M.Sc., Supervisor of the Drug Confirmation Lab, Laboratory Services Division, University of Guelph. In her report, Louise Spilsbury refers to the five Final Reports produced by her lab, dated between December 23, 2010, and January 10, 2011, which indicate that the concentration of Paylean (a brand name product with Ractopamine as its active ingredient) in the case of each sample was "< 1 ppm." Ms. Spilsbury advised that one part-per-million (1 ppm) is the reporting standard for Ractopamine as set by the CFIA. In other words, the laboratory never reports a level of 0 ppm of Ractopamine; the lowest possible report is "< 1 ppm."

41. However, the limit of detection (i.e., the level of concentration that the test method is capable of detecting) is lower than the limit of quantitation. In this case, the tests could not detect *any* ractopamine, as discussed in the expert report of Louise Spilsbury, M.Sc. The underlying data supporting the final report did not show any detected Ractopamine. Ms. Spilsbury noted, "Chromatograms of the samples showed no evidence of ractopamine. ... The baseline was flat, indicating the absence of detectable ractopamine."

Expert Report of Dr. Trevor Smith:

42. On June 6, 2012, Masterfeeds served the expert report of Dr. Trevor Smith, Ph.D., P.Ag., Professor of Animal and Poultry Science, researcher of animal nutrition and feed toxicology, University of Guelph.

43. In his report dated June 6, 2012 (as amended on June 28, 2012, to correct a typographical error), Dr. Trevor Smith opined based on scientific literature that the concentration of Ractopamine in La Gran Ruby's urine "would have required the absurd consumption of 1,720.63 kg of concentrate by the horse in question."

44. Dr. Smith further opined that "ractopamine can also enter the bloodstream by inhalation and this may have been the source of such minor contamination" in this case and the case discussed in the literature.

45. Dr. Smith finally concluded "that there is no evidence that the suspect premix lead (sic) to residual urinary ractopamine in the current case."

46. On June 8, 2012, a conference call was held involving the Chair of the Hearing, counsel for the Administration of the ORC and counsel for Masterfeeds. One of the issues dealt with during that call was whether Masterfeeds could file its expert reports given the timeframes prescribed by the Rules of Procedure. The Chair ruled that Masterfeeds could file its expert reports. In addition, the Hearing was adjourned on consent to October 24 and 25, 2012 to allow for the potential filing of further materials by both parties.

Supplementary Expert Report of Dr. Barker:

47. On July 31, 2012, counsel on behalf of the Administration of the ORC received and served a supplementary expert report from Dr. Barker. In his Supplementary Report, Dr. Barker acknowledges the methodology/sensitivity of testing at the University of Guelph and opines: "it must be concluded that the analyses as conducted neither confirm, or refute the idea that ractopamine was or was not present in the samples tested...there is also, at this point, no proof, one way or another, that the feed was a source for the ractopamine",

48. The Supplementary Expert Report of Dr. Barker recognizes that there was no evidence that Ractopamine was present in the samples tested.

Conclusions in Respect of the Feed

49. The equine feed products of Masterfeeds and Nobleton were tested, and those tests revealed that the products were not contaminated with Ractopamine.

50. The equine feed products of Masterfeeds and Nobleton were not the cause of La Gran Ruby's positive urine test for Ractopamine.

JOINT SUBMISSION ON DISPOSITION

WHEREAS in rendering Ruling Number TB 6926/11 the Stewards acted in the good faith discharge of their duties based upon their appraisal of the information and materials that were available to them prior to the issuance of Ruling Number TB 6926/11;

AND WHEREAS investigation following the issuance of Ruling Number TB 6926/11 revealed that Masterfeeds' and Nobleton's products were not contaminated with Ractopamine;

AND WHEREAS La Gran Ruby's positive test for Ractopamine was not precipitated by ingestion of a Masterfeeds or Nobleton product;

The Administration of the ORC and Masterfeeds, agree to the following disposition in relation to the HEARING:

i) The appeal is allowed; and

ii) Ruling Number TB 6926/11 as it pertains to Masterfeeds is set aside and a declaration issued that Masterfeeds and Nobleton's products were not contaminated with Ractopamine and were not the source of La Gran Ruby's positive urine test for Ractopamine.

Respectfully submitted this 24th day of October, 2012

Masterfeeds Inc.
Per: Robert J. Flack
President & C.E.O.
Masterfeeds Inc.

Steve Lehman
Executive Director, ORC

John K. Downing
Counsel for Masterfeeds

Jennifer Friedman
Counsel for the Administration of the ORC