



**Racing Officials Accreditation Program  
821 Corporate Drive Lexington, KY 40503**

August 1, 2019

Dear ARCI Model Rules Committee:

In response to the industry request for feedback on the proposed modifications to the ARCI Penalty Guidelines restructure, the ROAP regional steward groups met July 23 – July 29 to discuss the possible penalty restructure. Then on July 30, the ROAP Stewards' Advisory committee reviewed the comments of the regional groups and compiled the below comments for your consideration.

Questions:

- If a drug appears on the Controlled Therapeutic Substances list, can it be considered in the Doping or Equine Endangerment penalty scheme? If so, what is the criteria for selecting the penalty scheme?
- How are the Multiple Medication Violation Points affected by the enhanced penalty scheme?

Concerns/Comments:

- Applying a summary suspension should be at the discretion of the stewards and not mandatory
- The owner penalties may be too harsh. The bigger problem seen is the effects of program training.
- Strict definitions of doping and treatment misuse needs to be available to promote consistency.
- Mitigating and aggravating circumstances are already available to stewards in the current penalty scheme.

The ROAP Stewards' Advisory Committee would like to continue conversations with ARCI regarding the proposed penalty scheme and welcomes any questions from the committee.

Sincerely,

Frank Lamb  
ROAP Stewards' Advisory Committee Chairman

Cathy O'Meara  
ROAP Manager