

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES
FTC DOCKET NO. 9423

ADMINISTRATIVE LAW JUDGE: JAY L. HIMES

IN THE MATTER OF:

NATALIA LYNCH
APPELLANT

JOINT MOTION FOR WITHDRAWAL FROM REVIEW OF THE
ADMINISTRATIVE LAW JUDGE WITH PREJUDICE

Appellant Natalia Lynch (“**Ms. Lynch**”), the Horseracing Integrity and Safety Authority, Inc. (“**Authority**”), and the Horseracing Integrity & Welfare Unit (the “**Agency**”) (collectively, the “**Parties**”) jointly move for withdrawal of this matter from review of the Administrative Law Judge with prejudice.

On November 10, 2023, Appellant Natalia Lynch (“**Ms. Lynch**”) was served a Notice of Sanctions by the Horseracing Integrity & Welfare Unit (the “**Agency**”) under the Horseracing Integrity and Safety Authority, Inc.’s (the “**Authority**”) Anti-Doping and Medication Control (“**ADMC**”) Program as the result of a final decision issued by Arbitrator Hon. Bernetta D. Bush on November 9, 2023 with respect to two ADMC Program Violations, one for Possession of a Banned Substance under Rule 3214(a) and one for alleged Presence of a Banned Substance under Rule 3212 (the “**Imposed Sanctions**”). On December 13, 2023, Ms. Lynch appealed the Arbitrator’s Final Decision, including the Imposed Sanctions, to the Federal Trade Commission by filing an application for *de novo* review by an Administrative Law Judge.

After a hearing was held but before closing arguments, the Parties reached a full and complete settlement of the matter and entered into a Settlement Agreement (the “**Agreement**”), dated September 18, 2024.

Accordingly, the Parties respectfully request, as set forth in the Proposed Order attached as Exhibit A hereto, that the Court order the withdrawal of this matter from review by the Administrative Law Judge With Prejudice and that the Court terminate these proceedings.

Dated: September 18, 2024.

Respectfully submitted,

/s/ Bryan H. Beauman

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CERTIFICATE OF SERVICE

Pursuant to Federal Trade Commission Rules of Practice 4.2(c) and 4.4(b), a copy of this Joint Motion for Withdrawal is being served on September 18, 2024, via Administrative E-File System and by emailing a copy to:

Hon. Jay L. Himes
Administrative Law Judge
Office of Administrative Law Judges
Federal Trade Commission
600 Pennsylvania Ave. NW
Washington DC 20580
Via e-mail: Oalj@ftc.gov

April Tabor
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Exhibit A

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES
FTC DOCKET NO. 9423

ADMINISTRATIVE LAW JUDGE: JAY L. HIMES

IN THE MATTER OF:

NATALIA LYNCH
APPELLANT

[PROPOSED] ORDER OF WITHDRAWAL FROM REVIEW BY THE
ADMINISTRATIVE LAW JUDGE

On November 10, 2023, Appellant Natalia Lynch (“**Ms. Lynch**”) was served a Notice of Sanctions by the Horseracing Integrity & Welfare Unit (the “**Agency**”) under the Horseracing Integrity and Safety Authority, Inc.’s (the “**Authority**”) Anti-Doping and Medication Control (“**ADMC**”) Program as the result of a final decision issued by Arbitrator Hon. Bernetta D. Bush on November 9, 2023 with respect to two ADMC Program Violations, one for Possession of a Banned Substance under Rule 3214(a) and one for alleged Presence of a Banned Substance under Rule 3212 (the “**Imposed Sanctions**”). On December 13, 2023, Ms. Lynch appealed the Arbitrator’s findings and the Imposed Sanctions to the Federal Trade Commission by filing an application for *de novo* review by an Administrative Law Judge. The application for review was granted by this Court and a limited evidentiary hearing was conducted on August 16, 2024.

After that hearing but before closing arguments, the Parties reached a full and complete settlement of the matter and entered into a Settlement Agreement (the “**Agreement**”), dated September 18, 2024. As a result of the Agreement, the Parties filed a Joint Motion for Withdrawal of the Matter from Review by the Administrative Law Judge with Prejudice.

IT IS HEREBY ORDERED THAT the Joint Motion for Withdrawal of the Matter from Review by the Administrative Law Judge With Prejudice, dated September 17, 2024, is **GRANTED**, and the proceedings before this Court are terminated.

ORDERED:

Jay L. Himes
Administrative Law Judge

Dated: September __, 2024.