

**Jeffrey S. Kerr**  
Chief Legal Officer and  
Chief Operating Officer



April 8, 2026

*Via email*

Weber County Commission

Commissioner Sharon Bolos  
[sbolos@webercountyutah.gov](mailto:sbolos@webercountyutah.gov)

Commissioner James H. Harvey  
[jharvey@webercountyutah.gov](mailto:jharvey@webercountyutah.gov)

Commissioner Gage Froerer  
[gfroerer@webercountyutah.gov](mailto:gfroerer@webercountyutah.gov)

**Re: Unregulated Racing at Golden Spike Event Center and  
Public Records Request**

Dear Commissioners Bolos, Froerer, and Harvey:

I am writing to supplement PETA's March 30, 2026 email from Hannah Schein to you, requesting that the Commission deny any applications for unregulated horse racing events, billed as matched races, at the Golden Spike Event Center due to the documented illegal activities that take place during these events, and to formally request public records under Utah's Government Records Access and Management Act (GRAMA).<sup>1</sup> Utah Code § 63G-2-101 to § 63G-2-901.

It appears that the Commission has approved an application to host unregulated races on April 12, 2026, based on the Center's promotion of the event (*see* Appendix A) and promotion by the event organizers.<sup>2</sup>

<sup>1</sup> Utah Code § 63G-2-101 to § 63G-2-901.

<sup>2</sup> *See, e.g.*, CB Promotions, FACEBOOK (Jan. 14, 2026), <https://www.facebook.com/photo/?fbid=1361221209368230&set=pb.100064410924588.-2207520000>; Photofinish Matape, FACEBOOK (Mar. 24, 2026), <https://www.facebook.com/photo/?fbid=968996315798834&set=pb.100080654225683.-2207520000>; Facebook event page, <https://www.facebook.com/events/1456815832761389/>.

PEOPLE FOR  
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NAME OF THE FOUNDATION TO  
SUPPORT ANIMAL PROTECTION.

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- PETA Germany
- PETA Switzerland
- PETA Netherlands
- PETA Foundation (U.K.)

The Center's website also indicates that the Commission approved applications for unregulated racing events to be held on June 21, 2026, July 5, 2026, and August 16, 2026 (*see* Exhibit A). However, the Commission Minutes Archive for 2025 and 2026 does not mention the 2026 unregulated racing applications or include a discussion of them at the Commission's public meetings.

Based on the evidence PETA provided to the Commission regarding the likely possession and use of illegal controlled substances, illegal gambling, and acts of cruelty to animals at unregulated horse racing events, PETA requests that the Commission immediately rescind its approval of unregulated races at the Center in 2026, cancel the referenced races, and deny any pending or future applications for unregulated racing.

### **Criminal Activity at Unregulated Races Throughout the Country**

At unregulated races throughout the country, horses and jockeys compete without safety regulations, industry rules, or oversight by state or federal authorities, creating a haven for criminal activity. PETA has amassed evidence of criminal activity at unregulated races across 31 states, including possession and use of illegal controlled substances, illegal gambling, and flagrant acts of cruelty to animals. For example:

- In Georgia, a ten-month PETA investigation into unregulated races uncovered repeated and systemic illicit and criminal activity, including trainers and jockeys injecting horses with illegal substances and abusing horses with electric shock devices. PETA's investigation revealed that syringes obtained at the Georgia track and later tested by accredited racing labs contained methamphetamine, cocaine, methylphenidate (Ritalin), and caffeine. Using PETA's evidence, Georgia prosecutors charged six jockeys with cruelty to animals and one bookie with felony commercial gambling.
- In Texas, after PETA compiled extensive evidence and submitted a complaint to state law enforcement that horses were electroshocked, injected with street drugs, and whipped ceaselessly at unregulated races, state law enforcement officials and the Texas Racing Commission raided an unlicensed racetrack in Levelland, Texas. The officials found electric shock devices, illegal equine and human drugs, and large amounts of currency. State law enforcement officials arrested fourteen people and seized cocaine and numerous gambling devices. The Texas Racing Commission reported that syringes obtained from the track revealed a new form of synthetic methamphetamine that was so potent it broke the University of California Davis's laboratory equipment that was used to analyze the substances.<sup>3</sup> The Commission also reported that they conducted "blood draws of every single horse that was on the premises at the time . . . [of] the illegal racing," and "every single blood test . . . came back positive with an illicit substance . . . including cocaine, methamphetamine, ritalinic acid which is Ritalin, Tramadol, phenylbutazone, clenbuterol, and approximately ten other substances that were most certainly illicit."<sup>4</sup>

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<sup>3</sup> Tex. Racing Comm'n Meeting Transcript, TEX. RACING COMM'N at 66-67 (Dec. 11, 2024), <http://bit.ly/3GB5kIC>.

<sup>4</sup> *Id.* at 67.

- In Idaho, 200 law enforcement personnel from local, state, and federal agencies raided an unregulated racetrack and arrested four people on illegal gambling-related charges in October 2025.<sup>5</sup> Law enforcement officials worked with the FBI for several months planning the raid and confirmed Sinaloa Cartel ties to the races. The FBI also collected several weapons and numerous drugs during the raid.
- In California, after PETA submitted evidence of rampant criminal activity taking place at unregulated races, California passed a first-of-its-kind regulation banning its licensees from participating in or attending unregulated races.<sup>6</sup> In July 2025, following a year-long PETA investigation into California-licensed jockey Jose Nicasio's activities at unregulated races, the California Horse Racing Board (CHRB) filed an Official Complaint against him for violating the new regulation.<sup>7</sup> In December 2025, the CHRB reached a settlement agreement with Nicasio that effectively permanently bans him from regulated racing in California.<sup>8</sup> In February 2026, PETA provided the CHRB with evidence of five additional California-licensed jockeys participating in unregulated races.

In sum, flagrant criminal activity—including the use of injectable illegal substances, illegal gambling, and egregious acts of cruelty to animals—can almost always be readily observed at every unregulated track throughout the country.

### **Criminal Activity at the Golden Spike Event Center**

The evidence PETA submitted to the Commissioners included information from live broadcasts of unregulated horse races held at the Center in 2024 and 2025, as well as race videos posted on social media after the events, showing participants engaging in what appears to be the same type of criminal activity PETA and law enforcement have found at other unregulated matched races. The Commission's approval to use publicly owned land for unregulated races that involve any such criminal activity would constitute aiding and abetting these crimes.

#### **A. Possession and use of illegal controlled substances**

PETA's evidence shows what appears to be widespread possession and use of illegal controlled substances to enhance horses' performance by participants openly carrying syringes and administering injections to horses shortly before races at the Center. The evidence even shows a child possessing one of those syringes.<sup>9</sup> There is no reason to inject a horse with any substance

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<sup>5</sup> *FBI, Partner Agencies Make Arrests in Illegal Gambling Operation*, FED. BUREAU OF INVESTIGATION SALT LAKE CITY (Oct. 19, 2025), <https://www.fbi.gov/contact-us/field-offices/saltlakecity/news/fbi-partner-agencies-make-arrests-in-illegal-gambling-operation>.

<sup>6</sup> See Cal. Code Regs. tit. 4, § 1902.

<sup>7</sup> *Official Complaint*, CAL. HORSE RACING BD. (Oct. 9, 2025), <https://www.chrb.ca.gov/DocumentRequestor2.aspx?Category=COMPLAINTS&SubCategory=&DocumentID=00052595>.

<sup>8</sup> *Stewards and Bd. Rulings*, CAL. HORSE RACING BD. (Jan. 8, 2026), [https://www.chrb.ca.gov/stewards\\_rulings.aspx](https://www.chrb.ca.gov/stewards_rulings.aspx).

<sup>9</sup> See PETA's March 30, 2026 letter to the Commission, and its accompanying link to a Dropbox containing screenshots and photos for June 22, 2025, [Redacted hyperlink].

immediately before a race other than to introduce an illegal substance to enhance the horse's performance.

El Dorian, a horse owned by race organizer Inoel Chavez and his partners, racing for the stable Cuadra El Misionero, fatally broke down shortly after crossing the finish line of an unregulated race at the Center on June 22, 2025.<sup>10</sup> Live video from the race shows that the team's trainer, Mariano Ruiz, was holding a syringe while entering the facility and then shaking it while in the paddock before uncapping it and approaching El Dorian in stall number two.<sup>11</sup> It is a near certainty that El Dorian was injected with an illegal controlled substance that contributed to his fatal breakdown.

Under Utah's Controlled Substances Act, it is unlawful:

- (i) for a person knowingly and intentionally to possess or use a controlled substance analog or a controlled substance, unless it was obtained under a valid prescription or order, . . . or as otherwise authorized by this chapter;
- (ii) for an owner . . . or person in control of a building . . . or other place to knowingly and intentionally permit a person to occupy the building . . . or other place while the person is unlawfully manufacturing, possessing, using, or distributing a controlled substance at that location.

Utah Code § 58-37-8. The Utah Criminal Code defines "person" to include "an individual, public or private corporation, government, partnership, or unincorporated association." Utah Code § 76-1-101.5.

## B. Illegal Gambling

PETA's evidence submitted to the Commission shows a man walking through a crowd of matched race spectators and appearing to take bets at the Center on June 22, 2025,<sup>12</sup> and men engaged in what appears to be an illegal game of dice.<sup>13</sup> Utah's gambling statute makes it illegal for a person to participate in gambling, fringe gambling, or online gambling. Utah Code 76-9-1402. Based on PETA's experience and evidence from prior investigations into unregulated races, in-person and online gambling are rampant at and in connection with unregulated race events.

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<sup>10</sup> *Id.*

<sup>11</sup> See PETA's March 30, 2026 letter to the Commission and its accompanying link to a Dropbox containing an MP4 download of a Facebook livestream video (at ~10:22), [Redacted hyperlink].

<sup>12</sup> See PETA's March 30, 2026 letter to the Commission, and its accompanying link to a Dropbox containing screenshots and photos for June 22, 2025, [Redacted hyperlink].

<sup>13</sup> See PETA's March 30, 2026 letter to the Commission, and its accompanying link to a Dropbox containing an MP4 download of a Facebook livestream video (the scene, visible from ~18:10 to 20:05, shows what appears to be cash being laid down, and men taking turns throwing dice), [Redacted hyperlink].

### C. Violations of Utah’s Cruelty to Animals Act

PETA’s evidence to the Commission also clearly shows jockeys and other participants at the Center using electric shock devices on horses and engaging in excessive whipping. One race participant used an electric prod on a horse while in the starting gate.<sup>14</sup> This conduct constitutes blatant and egregious cruelty to animals, defined in Utah’s Cruelty to Animals Act as “intentionally, knowingly, recklessly, or with criminal negligence . . . injur[ing] an animal.” Utah Code § 76-13-202(c). As discussed above, El Dorian’s fatal breakdown also violated the cruelty statute.<sup>15</sup>

### D. Aiding and abetting criminal activity

By approving the Center for use in unregulated matched races, the Commission is likely aiding and abetting the criminal conduct described herein. Under Utah law, “[e]very person, acting with the mental state required for the commission of an offense who solicits, requests, . . . encourages, or intentionally aids another person to engage in conduct which constitutes an offense shall be criminally liable as a party for such conduct.” Utah Code § 76-2-202. “Person” includes the government under Utah’s Criminal Code. Utah Code § 76-1-101.5.

The Commission should immediately rescind its approval of applications for upcoming unregulated races and deny all pending and future unregulated racing applications. I look forward to your confirmation that the races have been canceled and will not be permitted again at the Center or on any other County-owned property.

### Public Records Request

In accordance with Utah’s Government Records Access and Management Act, PETA hereby requests : (1) copies of all applications to host unregulated matched races at the Center in 2025 and 2026, and (2) any records related to the Commission’s decision to approve unregulated matched races in 2025 and 2026.<sup>16</sup> If all or part of any of the requested records are considered exempt from release, please redact the portions to which you are asserting an exemption and provide access to all reasonably segregable non-exempt portions, provide a brief description of the record(s), and specify the reasons and legal authority exempting such record(s) from disclosure.<sup>17</sup>

Because releasing the requested records primarily benefits the public due to the likely illegal acts occurring on public property, we respectfully request that the Commission waive all fees related

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<sup>14</sup> See PETA’s March 30, 2026 letter to the Commission and its accompanying link to a Dropbox containing a YOUTUBE video showing this act of cruelty to animals (the scene starts at 2:09) [Redacted hyperlink].

<sup>15</sup> See PETA’s March 30, 2026 letter to the Commission and its accompanying Dropbox link containing videos of the fatal breakdown, [Redacted hyperlink] (the fatal breakdown occurs at ~22:43), and screenshots of El Dorian’s fatal breakdown, [Redacted hyperlink].

<sup>16</sup> Utah Code § 63G-2-101 to § 63G-2-901.

<sup>17</sup> In accordance with Utah Code §63-G-2-205.

to the production of the responsive documents.<sup>18</sup> If this fee waiver request is denied and fees are expected to exceed \$25.00, please notify me before this request is processed.

To conserve public resources, please provide the requested records, if possible, via email to my email address on this letterhead. Thank you for your attention to this important matter.

Very truly yours,



Jeffrey S. Kerr

cc: Marty Smith, Director of Weber County Culture, Parks & Rec. (msmith@co.weber.ut.us)  
Duncan Olsen, General Manager, Golden Spike Event Center (dolsen@co.weber.ut.us)  
Ryan Arbon, Weber County Sheriff (rarbon@webercountyutah.gov)  
Christopher F. Allred, Weber County Attorney (callred@co.weber.ut.us)  
Thane Marshall, Executive Director, Utah Horse Racing Commission,  
(thmarshall@utah.gov)  
Brandon Heaps, President, Utah Quarter Horse Racing Association  
(brandonheaps@me.com)  
Shelly Halacy, Executive Coordinator (shalacy@co.weber.ut.us)  
Stacy Skeen, Weber County GRAMA records (sskeen@co.weber.ut.us)

Attachments: Exhibit A

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<sup>18</sup> Under Utah's GRAMA, "[a] governmental entity may fulfill a record request without charge and is encouraged to do so if it determines that: (a) releasing the record primarily benefits the public rather than a person." Utah Code § 63G-2-203(4).

# **EXHIBIT A**



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# Matched Horse Races

Sun, Apr 12 | Golden Spike Event Center



## Time & Location

Apr 12, 2026, 9:30 AM – 4:00 PM

Golden Spike Event Center, 1000 N 1200 W St, Ogden, UT 84404, USA

## About the Event

Race down to Golden Spike Event Center for Matched Horse Races!

Tickets sold at the gate. Gates open at 9AM and event begins at 9:30AM. Concessions will be available!

\$60 (12 & up)

FREE\* (12 & under)

*Matched Horse Races, GOLDEN SPIKE EVENT CTR.,*  
<https://www.goldenspikeeventcenter.com/event-details/matched-horse-races-13>  
(April 12, 2026).



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# Matched Horse Races

Sun, Jun 21 | Golden Spike Event Center



## Time & Location

Jun 21, 2026, 9:30 AM – 4:00 PM  
Golden Spike Event Center, 1000 N 1200 W St, Ogden, UT 84404, USA

## About the Event

Race down to Golden Spike Event Center for Matched Horse Races!

Tickets sold at the gate. Gates open at 9AM and event begins at 9:30AM. Concessions will be available!

\$60 (12 & up)  
FREE\* (12 & under)

*Matched Horse Races*, GOLDEN SPIKE EVENT CTR.,  
<https://www.goldenspikeeventcenter.com/event-details/matched-horse-races-14>  
(June 21, 2026).



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# Matched Horse Races

Sun, Jul 05 | Golden Spike Event Center



## Time & Location

Jul 05, 2026, 9:30 AM – 4:00 PM  
Golden Spike Event Center, 1000 N 1200 W St, Ogden, UT 84404, USA

## About the Event

Race down to Golden Spike Event Center for Matched Horse Races!

Tickets sold at the gate. Gates open at 9AM and event begins at 9:30AM. Concessions will be available!

\$60 (12 & up)  
FREE\* (12 & under)

*Matched Horse Races*, GOLDEN SPIKE EVENT CTR.,  
<https://www.goldenspikeeventcenter.com/event-details/matched-horse-races-15>  
(July 5, 2026).



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# Matched Horse Races

Sun, Aug 16 | Golden Spike Event Center



## Time & Location

Aug 16, 2026, 9:30 AM – 4:00 PM  
Golden Spike Event Center, 1000 N 1200 W St, Ogden, UT 84404, USA

## About the Event

Race down to Golden Spike Event Center for Matched Horse Races!

Tickets sold at the gate. Gates open at 9AM and event begins at 9:30AM. Concessions will be available!

\$60 (12 & up)  
FREE\* (12 & under)

*Matched Horse Races, GOLDEN SPIKE EVENT CTR.,*  
<https://www.goldenspikeeventcenter.com/event-details/matched-horse-races-16>  
(August 16, 2026).