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**BEFORE THE BOARD OF MEDICAL EXAMINERS
OF THE STATE OF NEVADA**

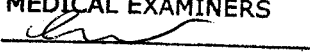
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In the Matter of Charges and)
)
Complaint Against)
)
JODI A. PARKS, M.D.,)
)
Respondent.)

Case No. 13-34161-1

FILED

FEB - 8 2013

NEVADA STATE BOARD OF
MEDICAL EXAMINERS
By: 

COMPLAINT

The Investigative Committee of the Nevada State Board of Medical Examiners (Board), composed of Theodore B. Berndt, M.D., Ms. Valerie J. Clark, BSN, RHU, LUTCF, and Michael J. Fischer, M.D., at the time of the authorization of filing this formal Complaint, by and through Edward O. Cousineau, Esq., Deputy Executive Director for the Board and counsel for the Investigative Committee, having a reasonable basis to believe that Jodi A. Parks, M.D., hereinafter referred to as "Respondent," has violated the provisions of Nevada Revised Statutes (NRS) Chapter 630, hereby issues its formal Complaint, stating the Investigative Committee's charges and allegations, as follows:

1. Respondent was licensed to practice medicine in the state of Nevada on August 19, 2008, Respondent's license to practice medicine is currently in active status, and at all times alleged herein, Respondent was licensed in active status by the Board pursuant to the provisions of Chapter 630 of the NRS.

2. In March of 2012, Respondent entered into a Consent Order with the Mississippi State Board of Medical Licensure (see Exhibit 1), which called for Respondent's medical license to be placed in a probationary status, with various conditions and restrictions attached thereto.

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3. Section 630.301(3) of the NRS provides that any disciplinary action, including without limitation, the revocation, suspension, modification or limitation of the license to practice any type of medicine by any other jurisdiction, is grounds for disciplinary action.

4. The probationary action related to Respondent's license to practice medicine in the state of Mississippi constitutes a violation of the provisions of NRS 630.301(3).


5. Based upon the foregoing, Respondent has violated NRS 630.301(3) and is subject to discipline by the Board as provided in NRS 630.352.

WHEREFORE, the Investigative Committee prays:

1. That the Board fix a time and place for a formal hearing;
2. That the Board give Respondent notice of the charges herein against him, the time and place set for the hearing, and the possible sanctions against him;
3. That the Board determine what sanctions it determines to impose for the violation or violations committed by Respondent; and
4. That the Board make, issue and serve on Respondent its findings of fact, conclusions of law and order, in writing, that includes the sanctions imposed.

DATED this 7th day of February, 2013.

INVESTIGATIVE COMMITTEE OF
THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 
Edward O. Cousineau, Esq.
Attorney for the Investigative Committee of the
Nevada State Board of Medical Examiners

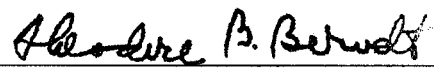
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VERIFICATION

STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)

Theodore B. Berndt, M.D., having been duly sworn, hereby deposes and states under penalty of perjury that he is the Chairman of the Investigative Committee of the Nevada State Board of Medical Examiners that authorized the Complaint against the Respondent herein; that he has read the foregoing Complaint; and that based upon information discovered in the course of the investigation into a complaint against Respondent, he believes that the allegations and charges in the foregoing Complaint against Respondent are true, accurate, and correct.

Dated this 7th day of February, 2013.



Theodore B. Berndt, M.D.

OFFICE OF THE GENERAL COUNSEL
Nevada State Board of Medical Examiners
1105 Terminal Way #301
Reno, Nevada 89502
(775) 688-2559


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CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 11th day of February 2013; I served a filed copy of the Complaint and Fingerprint information via USPS e- certified return receipt mail to the following:

Jodi A. Parks, M.D.
18183 Monga Drive
Covington, LA 70433

Dated this 11th day of February, 2013.



Angelia L. Donohoe
Legal Assistant

EXHIBIT

1

BEFORE THE MISSISSIPPI STATE BOARD OF MEDICAL LICENSURE

IN THE MATTER OF THE PHYSICIAN'S LICENSE

OF

JODI ALLEN PARKS, M.D.

CONSENT ORDER

WHEREAS, JODI ALLEN PARKS, M.D., hereinafter referred to as "Licensee," is the current holder of License Number 20711 issued on June 30, 2009, to practice medicine in the State of Mississippi;

WHEREAS, the Investigative Staff of the Mississippi State Board of Medical Licensure, hereinafter referred to as the "Board," has conducted a comprehensive investigation into the medical practice of Licensee in Picayune, Mississippi, and has in its possession pre-signed prescription blanks and other evidence indicating that Licensee has violated the Rules and Regulations of the Board, "Pertaining to Prescribing, Administering, and Dispensing of Medication;" is guilty of unprofessional conduct, which includes being guilty of dishonorable conduct likely to deceive, defraud or harm the public; and has administered, dispensed or prescribed narcotic drugs or other drugs having addiction-forming or addiction-sustaining liability otherwise than in the course of legitimate professional practice;

WHEREAS, on or about November 1, 2011, Licensee signed a voluntary surrender of controlled substance privileges, thereby relinquishing Licensee's Drug

Enforcement Administration (DEA) Uniform Controlled Substances Registration Certificate for schedules II, IIN, III, IIIN, IV, and V;

WHEREAS, the above enumerated conduct, if established before the Board, constitutes a violation of the Mississippi Medical Practice Act and specifically, Subsections (3), (8)(d) and (13) of Miss. Code Ann. § 73-25-29, and Miss. Code Ann. § 73-25-83(a) for which the Board may revoke the medical license of Licensee, suspend it for a time deemed proper by the Board, or take any other action as the Board may deem proper under the circumstances;

WHEREAS, it is the desire of Licensee to avoid a hearing before the Board and, in lieu thereof, has agreed to enter into this Consent Order subject to the terms, conditions and restrictions as specified below;

NOW, THEREFORE, the Mississippi State Board of Medical Licensure with the consent of Licensee as signified by her joinder herein, does hereby place Licensee's certificate to practice medicine in the State of Mississippi on probation, subject to the following terms and conditions:

1. Licensee's medical license (No. 20711) to practice medicine in the State of Mississippi is hereby placed on probation for a period of one (1) year. At the first available meeting date following expiration of the one (1) year probationary term, Licensee shall appear before the Board to review her compliance with this Order.
2. During the one (1) year period of probation, Licensee shall attend and successfully complete Continuing Medical Education (CME) courses in the following areas: (i) proper prescribing of controlled substances; (ii) medical ethics;

and (iii) proper medical record keeping. The CME courses required herein shall be American Medical Association (AMA) approved Category I credits. Any credit received for such courses shall be in addition to the usual forty (40) hours of Category I credits required by Board regulation. Licensee will be required to be on-site while taking any and all CME courses, as courses can not be taken on-line or by other means.

3. Licensee's practice of medicine in Mississippi will be restricted to clinical pathology, including blood banking and/or transfusion medicine only (no anatomic pathology).
4. Licensee shall report in writing to the Board within fifteen (15) days should her medical license in any state be subject to investigation or disciplinary action.
5. Licensee's medical practice shall be subject to periodic surveillance. The Board's Director, any member of the Board, or Investigator for the Board may perform an unannounced inspection of any clinic wherein Licensee practices, which may include a chart review of selected patient files.
6. Licensee shall obey all federal, state and local laws, and all rules and regulations governing the practice of medicine.
7. Should the Board hereafter receive documented evidence of Licensee violating any of the terms and conditions of this Consent Order, the Board shall have the right to summarily suspend Licensee's certificate to practice medicine without a hearing, provided Licensee shall be given an opportunity for a due process

hearing on the matter at the first available regular meeting date following issuance of the summary suspension.

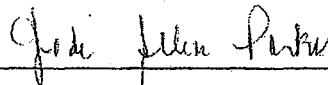
8. Licensee shall reimburse the Board for all costs incurred in relation to the pending matter pursuant to Miss. Code Ann. § 73-25-30, said amount not to exceed \$10,000. Licensee shall be advised of the total assessment by separate written notification, and shall tender to the Board a certified check or money order made payable to the Mississippi State Board of Medical Licensure, on or before forty (40) days from the date the assessment is mailed to Licensee via U.S. Mail.

This Consent Order shall be subject to approval by the Board. If the Board fails to approve this Consent Order, in whole or in part, it shall have no force or effect on the parties. It is further understood and agreed that the purpose of this Consent Order is to avoid a hearing before the Board. In this regard, Licensee authorizes the Board to review and examine any documentary evidence or material concerning the Licensee prior to or in conjunction with its consideration of this Consent Order. Should this Consent Order not be accepted by the Board, it is agreed that presentation to and consideration of this Consent Order and other documents and matters pertaining thereto by the Board shall not unfairly or illegally prejudice the Board or any of its members from further participation in any hearing or other resolution of the proceeding. Licensee understands and expressly acknowledges that this Consent Order, if approved and executed by the Mississippi State Board of Medical Licensure, shall constitute a public record of the State of Mississippi. Licensee further acknowledges that the Board shall provide a copy of this Order to, among others, the National Practitioner Data Bank and the U.S. Drug

Enforcement Administration, and the Board makes no representation as to action, if any, which the U.S. Drug Enforcement Administration may take in response to this Order.

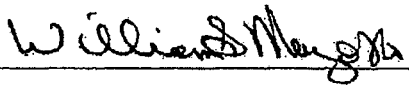
Recognizing her right to notice of charges specified against her, to have such charges adjudicated pursuant to Miss. Code Ann. Section §73-25-27, to be represented therein by legal counsel of her choice, and to a final decision rendered upon written findings of fact and conclusions of law, JODI ALLEN PARKS, M.D., nonetheless, hereby waives her right to notice and a formal adjudication of charges, thereby placing the above enumerated terms, conditions and restrictions on her license to practice medicine in the State of Mississippi.

EXECUTED this the 22nd day of March, 2012.



Jodi Allen Parks, M.D.

ACCEPTED AND APPROVED this the 22nd day of March, 2012, by the
Mississippi State Board of Medical Licensure.



William S. Mayo, D.O., President
Mississippi State Board of Medical
Licensure