

1 for a weight loss clinic, when in fact she was an independent contractor for the weight loss clinic,
2 serving as its medical director. As the medical director, Respondent delegated the provision of
3 medical services to individuals not licensed to practice medicine and was subject to the
4 requirements of Colorado Medical Board Rule 800, 3 C.C.R. 713-30. Pursuant to Colorado
5 Medical Board Rule 800, the Colorado Medical Board requested that Respondent provide the
6 delagatee's qualifications to the Board. Respondent refused multiple times to provide the
7 requested documentation. Respondent admitted that her refusal to comply with a valid board order
8 or any rule or regulation promulgated by the board in conformance with law constituted
9 unprofessional conduct.

10 3. Respondent received a letter of admonition and her Colorado license to practice
11 medicine was placed on probation for five years, commencing on July 14, 2016. During the period
12 of probation, Respondent is not allowed to delegate the rendering of medical services to a person
13 who is not licensed to practice medicine. Respondent is not authorized to act as a primary
14 supervisor of physician assistants. Respondent is not allowed to delegate the rendering of medical
15 services to a physician assistant or act as a secondary supervisor to a physician assistant, except
16 under certain circumstances. Respondent was further ordered to complete a Professional/Problem
17 Based Ethics Program.

18 4. Respondent did not timely report the July 14, 2016 Stipulation and Final Agency
19 Order to the Nevada State Board of Medical Examiners.

20 **Count I**

21 **(NRS 630.301(3))**

22 5. All of the allegations contained in the above paragraphs are hereby incorporated by
23 reference as though fully set forth herein.

24 6. NRS 630.301(3) provides that any disciplinary action, including the revocation,
25 suspension, modification or limitation of a license to practice any type of medicine, taken by
26 another state, is grounds for initiating disciplinary action against a licensee.

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3. That the Nevada State Board of Medical Examiners determine what sanctions to impose if it determines there has been a violation or violations of the Medical Practice Act committed by Respondent;

4. That the Nevada State Board of Medical Examiners make, issue and serve on Respondent its findings of fact, conclusions of law and order, in writing, that includes the sanctions imposed; and

5. That the Nevada State Board of Medical Examiners take such other and further action as may be just and proper in these premises.

DATED this 8th day of March, 2017.

INVESTIGATIVE COMMITTEE OF
THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: Jasmine K. Mehta
Robert Kilroy, Esq.
General Counsel and Attorney for the Investigative Committee
Jasmine K. Mehta, Esq.
Deputy General Counsel and Attorney for the Investigative Committee


VERIFICATION

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STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)

Wayne Hardwick, 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 8th day of MARCH, 2017.



Wayne Hardwick, M.D.

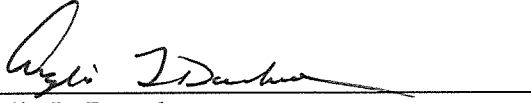
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CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 8th day of March 2017; I served a file copy of COMPLAINT & Fingerprint Information, via USPS certified electronic return receipt mail to the following:

Rita Starritt, M.D.
5721 La Jolla Hermosa Ave.
La Jolla, CA 92037-7330

Dated this 8th day of March, 2017.



Angelia L. Donohoe
Legal Assistant