

BEFORE THE BOARD OF MEDICAL EXAMINERS
OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and Complaint

Case No. 21-51633-1

Against:

FILED

TAMMY LYNN HANKINS, PA-C

DEC - 7 2021

Respondent.

NEVADA STATE BOARD OF
MEDICAL EXAMINERS
By: 

FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER

This case was presented for adjudication and decision before the Nevada State Board of Medical Examiners (Board), during a regularly scheduled Board meeting on December 3, 2021, at 8:40 a.m., (Pacific Standard Time), located at 325 E. Warm Springs Road, Suite 225, Las Vegas, NV 89119. Tammy Lynn Hankins, PA-C (Respondent), was properly served with a notice of the adjudication, including the date, time, and location. Respondent was not present personally or through an attorney. Rosalie M. Bordelove, Esq., Chief Deputy Attorney General, served as legal counsel to the Board. The adjudicating members of the Board rendering these Findings of Fact, Conclusions of Law (FOFCOL) and Order are: Bret W. Frey, M.D., Chowdhury H. Ahsan, M.D., Ph.D., FACC, Ms. Pamela J. Beal, Col. Eric D. Wade, USAF (Ret.), Nicola (Nick) M. Spirtos, M.D., FACOG, and Carl N. Williams, Jr., M.D., FACS.

The Board, having received and read the First Amended Complaint (Complaint) and exhibits admitted at the hearing of this matter, the Hearing Officer's Findings and Recommendations¹, and the transcript of the hearing, made its decision pursuant to its authority and provisions of the Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act), NRS Chapter 622A, and NRS Chapter 233B, as applicable.

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¹ The Hearing Officer's Findings and Recommendations were prepared by Patricia Halstead, Esq., who was appointed as Hearing Officer under NRS 630.106 in this matter and presided over the hearing.

1 The Board, after due consideration of the record, evidence and law, and being fully
2 advised in the premises, makes its FINDINGS OF FACT, CONCLUSIONS OF LAW AND
3 ORDER in this matter, as follows:

4 **FINDINGS OF FACT**

5 **I.**

6 Respondent held a license to practice medicine in the State of Nevada issued by the Board
7 from March 6, 2020, to present.

8 **II.**

9 On July 20, 2021, the Investigative Committee filed its formal First Amended Complaint
10 (Complaint) in Case No. 21-51633-1, alleging Respondent violated the Medical Practice Act.
11 Respondent was served with the Complaint on July 24, 2021, at her address of record with the
12 Board. Pursuant to NRS 630.254, each licensee shall maintain a permanent mailing address with
13 the board to which all communications from the Board to the licensee must be sent. A licensee
14 who changes his or her permanent mailing address shall notify the Board in writing of the new
15 permanent mailing address within 30 days after the change.

16 The Complaint alleges fifty-three (53) violations of the Medical Practice Act that
17 constitute grounds for initiating disciplinary action against a licensee, as follows: eight (8) counts
18 of NRS 630.400(1)(d), Unlicensed Practice of Medicine, Counts I, V, IX, XIII, XVII, XXIII,
19 XXVIII and XXXII; twelve (12) counts of NRS 630.301(4) Malpractice, Counts II, VI, X, XIV,
20 XVIII, XXIV, XXIX, XXXIII, XXXVII, XLI, XLV and XLIX; five (5) counts of
21 NRS 630.3062(1)(h) Fraudulent, Illegal, Unauthorized and Otherwise Inappropriate Prescribing of
22 Schedule IV Controlled Substance, Counts III, VII, XI, XV, XIX; twelve (12) counts of
23 NRS 630.301(9) Disreputable Conduct, Counts IV, VIII, XII, XVI, XX, XXV, XXX, XXXIV,
24 XXXIX, XLIII, XLVII and LI; two (2) counts of NRS 630.306(1)(u) Illegal Injection of Botox or
25 Xeomin, Counts XXI and XXVI; three (3) counts of NRS 630.306(1)(u) Illegal Injection of Versa,
26 Counts XXII, XXVII and XXXI; one (1) count of NRS 630.304(1) Fraud and Misrepresentation
27 in Obtaining a License, Count XXXV; four (4) counts of NAC 630.380(1)(c) Performing Medical
28 Services Without A Supervising Physician, Counts XXIV, XL, XLIV and XLVIII; four (4) counts

of NRS 360.306(1)(o) Administration of Conscious Sedation at an Unaccredited and Unpermitted Facility, Counts XXXVIII, XLII, XLVI and L; one (1) count of NRS 630.306(1)(g) Continual Failure to Practice Medicine Properly, Count LII; and one (1) count of NRS 630.3065(2)(a) Knowing or Willful Failure to Comply with an Order of the Investigative Committee, Count LIII.

Respondent did not answer or file a response to the allegations set forth in the Complaint. Pursuant to NAC 630.460(4), the allegations of the Complaint are deemed generally denied if an answer is not filed.

III.

An Order Scheduling Early Case Conference was filed on August 16, 2021, scheduling the Early Case Conference for the pending matter for September 2, 2021, at 10:00 a.m. This Order was mailed via USPS Certified Mail, postage pre-paid, to Respondent's address of record, and was delivered to and signed for on August 21, 2021, at 12:09 p.m. On September 2, 2021, a telephonic Early Case Conference was conducted in this matter. Aaron Bart Fricke, J.D., General Counsel, (Mr. Fricke) was present on behalf of the Investigative Committee (IC) of the Board, with Hearing Officer Patricia Halstead, Esq. Respondent did not appear or participate. The parties agreed to dates for the pre-hearing conference, exchange of documents, and the hearing date.

In compliance with NAC 630.465, a Scheduling Order, setting pre-hearing and hearing was filed on September 13, 2021, setting the pre-hearing conference for September 16, 2021, at 3:30 p.m., and setting the hearing for October 19, 2021, at 8:30 a.m., at the Office of the Nevada State Board of Medical Examiners, 9600 Gateway Drive, Reno, Nevada 89521, and video conferenced to the Board's Las Vegas Office, located at 325 E. Warm Springs Road, Suite 225, Las Vegas, NV 89119. The Scheduling Order was delivered to Respondent at her address of record via Fed Ex Priority mail on September 14, 2021.

An Amended Scheduling Order was then filed on September 20, 2021, changing the Pre-Hearing Conference to September 22, 2021, the remainder of the Scheduling Order filed on September 13, 2021, remained the same. The Amended Scheduling Order was delivered to Respondent at her address of record via Fed Ex Priority Mail on September 21, 2021.

1 The Pre-Hearing Conference was held telephonically as noticed and ordered, at which
2 time, legal counsel for the IC, Mr. Fricke, appeared. Neither the Respondent nor any
3 representative of the Respondent appeared at the Pre-Hearing Conference. Respondent was timely
4 and properly served with the Pre-Hearing Conference Statement and the mandated Pre-Hearing
5 Disclosures in accordance with NRS and NAC Chapters 630, NRS Chapters 241, 622A and 233B,
6 and the requirements of due process, by Fed Ex Priority Mail, delivered to Respondent at her
7 address of record on September 22, 2021, at 11:43 a.m.

8 IV.

9 On October 19, 2021, as duly noticed and ordered, a hearing was held before the Hearing
10 Officer to receive evidence and to hear the arguments of both parties. Legal counsel for the IC,
11 Mr. Fricke, appeared. Respondent did not attend the hearing, nor did she have counsel appear on
12 her behalf. Mr. Fricke presented the IC's case, offered documentary evidence and presented
13 witness testimony. Exhibits 1 through 58, were marked and admitted into evidence.

14 Pursuant to NRS 622A.350(1) and (2), as Respondent did not appear and as a continuance
15 had not been scheduled, sought or granted, Mr. Fricke made an offer of proof on the record that
16 Respondent was given sufficient legal notice. Upon a determination by the regulatory body or
17 hearing panel or officer that the absent party was given sufficient legal notice, the regulatory body
18 or hearing panel or officer may proceed to consider and dispose of the case without the
19 participation of the absent party. Based thereon, good cause appearing, the Hearing Officer found
20 that sufficient legal notice had been provided to the Respondent, and therefore found that the
21 Board may accept the IC's allegations against the Respondent in the Complaint as true.

22 Notwithstanding the presumption afforded the Board pursuant to NRS 622A.350(2),
23 Mr. Fricke presented the IC's case in its entirety, thus establishing a record for the Board to
24 review the case on the merits.

25 The Hearing Officer provided the Findings and Recommendations, filed
26 November 17, 2021. This matter was scheduled for final adjudication on December 3, 2021, at a
27 regularly scheduled Board meeting.

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1 The notice of the adjudication was sent via USPS Certified Mail, and was delivered on
2 Respondent's address of record on October 30, 2021, at 12:55 p.m.

3 A copy of the adjudication materials along with a copy of the Hearing Officer's Findings
4 and Recommendation were mailed via USPS Certified Mail, and were delivered on Respondent's
5 address of record on November 26, 2021, at 1:48 p.m.

6 **V.**

7 Pursuant to NRS 622A.300(5)(a), the Findings and Recommendations of the Hearing
8 Officer are hereby approved and adopted by the Board, in their entirety and without modification,
9 and are hereby specifically incorporated and made part of this Order by reference. A copy of the
10 Findings and Recommendations filed on November 17, 2021, in this matter is attached hereto as
11 **Exhibit 1.**

12 **VI.**

13 The Board hereby finds that Counts I-LIII, as set forth in the Complaint, and as
14 recapitulated in Paragraph II above, have been established by a preponderance of the evidence.

15 **VII.**

16 If any of the foregoing Findings of Fact is more properly deemed a Conclusion of Law, it
17 may be so construed.

18 **CONCLUSIONS OF LAW**

19 **I.**

20 The Board has jurisdiction over Respondent and the Complaint, and an adjudication of this
21 matter by the Board members as set forth herein is proper.

22 **II.**

23 Respondent was timely and properly served with the Complaint, and all notices and orders
24 in advance of the hearing and adjudication thereon, in accordance with NRS and NAC
25 Chapters 630, NRS Chapters 241, 622A and 233B, and all legal requirements of due process.

26 **III.**

27 With respect to the allegations of the Complaint, the Board concludes that Respondent has
28 violated the Medical Practice Act, as alleged in the First Amended Complaint, as follows: eight

(8) counts of NRS 630.400(1)(d), Unlicensed Practice of Medicine, Counts I, V, IX, XIII, XVII, XXIII, XXVIII and XXXII; twelve (12) counts of NRS 630.301(4) Malpractice, Counts II, VI, X, XIV, XVIII, XXIV, XXIX, XXXIII, XXXVII, XLI, XLV and XLIX; five (5) counts of NRS 630.3062(1)(h) Fraudulent, Illegal, Unauthorized and Otherwise Inappropriate Prescribing of Schedule IV Controlled Substance, Counts III, VII, XI, XV, XIX; twelve (12) counts of NRS 630.301(9) Disreputable Conduct, Counts IV, VIII, XII, XVI, XX, XXV, XXX, XXXIV, XXXIX, XLIII, XLVII and LI; two (2) counts of NRS 630.306(1)(u) Illegal Injection of Botox or Xeomin, Counts XXI and XXVI; three (3) counts of NRS 630.306(1)(u) Illegal Injection of Versa, Counts XXII, XXVII and XXXI; one (1) count of NRS 630.304(1) Fraud and Misrepresentation in Obtaining a License, Count XXXV; four (4) counts of NAC 630.380(1)(c) Performing Medical Services Without A Supervising Physician, Counts XXIV, XL, XLIV and XLVIII; four (4) counts of NRS 360.306(1)(o) Administration of Conscious Sedation at an Unaccredited and Unpermitted Facility, Counts XXXVIII, XLII, XLVI and L; one (1) count of NRS 630.306(1)(g) Continual Failure to Practice Medicine Properly, Count LII; and one (1) count of NRS 630.3065(2)(a) Knowing or Willful Failure to Comply with an Order of the Investigative Committee, Count LIII. Accordingly, Respondent is subject to discipline pursuant to NRS 630.352.

IV.

The Board finds that, pursuant to NRS 622.400, recovery from Respondent of reasonable attorneys' fees and costs incurred by the Board as part of its investigation and disciplinary proceedings against Respondent is appropriate. The Board has reviewed the Investigative Committee's Memorandum of Costs and Disbursements and Attorneys' Fees, and the Board finds them to be the actual fees and costs incurred by the Board as part of its investigative, administrative and disciplinary proceedings against Respondent, and finds them to be reasonable and necessary based on: (1) the abilities, training, education, experience, professional standing and skill demonstrated by Board staff and attorneys; (2) the character of the work done, its difficulty, its intricacy, its importance, the time and skill required, the responsibility imposed and the prominence and character of the parties where, as in this case, they affected the importance of the litigation; (3) the work actually performed by the Board's attorneys and staff, and the skill,

1 time and attention given to that work; and (4) the product of the work and benefits to the Board
2 and the people of Nevada that were derived therefrom.

3 V.

4 If any of the foregoing Conclusions of Law is more properly deemed a Finding of Fact, it
5 may be so construed.

6 **ORDER**

7 Based upon the foregoing Findings of Fact and Conclusions of Law, and good cause
8 appearing therefore,

9 IT IS HEREBY ORDERED that:

10 1. Pursuant to NRS 630.352(4)(e), the Board shall administer a written public
11 reprimand to Respondent.

12 2. Pursuant to NRS 630.352(4)(d), Respondent's license to practice medicine as a
13 physician assistant is hereby revoked. In accord with NRS 622A.410(1), the Board hereby
14 prescribes a period of ten (10) years, during which Respondent may not apply for reinstatement of
15 this license;

16 3. Pursuant to NRS 630.352(4)(h), Respondent is hereby ordered to pay a fine of one
17 thousand dollars (\$1,000.00) per violation of the Medical Practice Act, for a total fine in the
18 amount of fifty-three thousand dollars (\$53,000.00), to be paid within sixty (60) days of service of
19 this Order; and

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Nevada State Board of Medical Examiners
9600 Gateway Drive
Reno, Nevada 89521
(775) 688-2559

IT IS SO ORDERED.

NEVADA STATE BOARD OF MEDICAL EXAMINERS

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VICTOR M. MURO, M.D.
President of the Board

CERTIFICATION

I certify that the foregoing is the full and true original **FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER** on file in the office of the Board of Medical Examiners in the matter of **TAMMY LYNN HANKINS, PA-C**, Case No. 21-51633-1.

I further certify that Victor M. Muro, M.D., is the President of the Nevada State Board of Medical Examiners and that full force and credit is due to his official acts as such; and that the signature to the foregoing ORDER is the signature of said Victor M. Muro, M.D.

IN WITNESS THEREOF, I have hereunto set my hand in my official capacity as Secretary-Treasurer of the Nevada State Board of Medical Examiners.

DATED this 7th day of December, 2021.

NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: Maggie Arias-Petrel
MAGGIE ARIAS-PETREL
Secretary-Treasurer and Public Member of the Board

EXHIBIT 1

EXHIBIT 1

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

3 * * * * *

4
5
6 **In the Matter of Charges and**

Case No. 21-51633-1

7 **Complaint Against**

FILED

8 **TAMMY LYNN HANKINS, PA-C,**

NOV 17 2021

9 **Respondent.**

**NEVADA STATE BOARD OF
MEDICAL EXAMINERS**

By: 

10
11 **FINDINGS AND RECOMMENDATIONS**

12 TO: Aaron B. Fricke, Esq.
13 General Counsel
14 Nevada State Board of Medical Examiners
15 9600 Gateway Drive
 Reno, Nevada 89521

16 Tammy Lynn Hankins, PA-C
17 3753 Cherry Tree Blvd.
 Lake Havasu City, Arizona 86406

18 This matter came for evidentiary hearing on October 19, 2021. Appearing for the hearing
19 were Aaron B. Fricke, Esq. on behalf of the Investigative Committee (the "IC") and the
20 undersigned Hearing Officer. Respondent Tammy Lynn Hankins, PA-C ("Respondent") did not
21 appear nor otherwise participate.

22 Notice to Respondent of the date and time of the hearing was confirmed on the record.
23 The hearing record does not reflect proof of service of the Scheduling Order, which initially set
24 the evidentiary hearing date and time;¹ however, an Amended Scheduling Order was issued and
25 filed on September 20, 2021, noticing the evidentiary hearing. A Proof of Service filed on
26

27 ¹ A Proof of Service for the Scheduling Order was filed subsequent to the evidentiary hearing on November 10, 2021,
28 which indicates that the Scheduling Order, which set the evidentiary hearing date and time, was delivered to
Respondent by certified mail on September 14, 2021 to her last known address.

1 September 24, 2021, indicates that the Amended Scheduling Order was served upon Respondent
2 by certified mail to her last known address on file with the Nevada State Board of Medical
3 Examiners (the "Board") on September 21, 2021. *See* NRS 630.254; NRS 630.255; NRS
4 630.344; and Volume 1, Exhibit 15. Thus, Respondent had notice of the evidentiary hearing.

5 Prior filings were also sent to Respondent by which she had notice of the proceedings such
6 as the Complaint and Errata thereto, proofs of service for which are reflected in the record at
7 Volume 1, Exhibits 4 and 5 respectively; the First Amended Complaint and Order for Summary
8 Suspension, proof of service for which are reflected at Volume 1, Exhibit 8; and the Order
9 Scheduling Early Case Conference, proof of service for which is reflected at Volume 1, Exhibit
10 10. Despite the filings served upon Respondent, she has failed to make any appearance in this
11 matter.

12 With Respondent having failed to appear and no continuance having been requested nor
13 granted, the matter was heard as scheduled pursuant to NRS 622A.350, which provides:

14 1. If a party fails to appear at a scheduled hearing and a continuance
15 has not been scheduled or granted, any party who is present at the hearing may
16 make an offer of proof that the absent party was given sufficient legal notice. Upon
17 a determination by the regulatory body or hearing panel or officer that the absent
18 party was given sufficient legal notice, the regulatory body or hearing panel or
19 officer may proceed to consider and dispose of the case without the participation of
20 the absent party.

21 2. If the licensee fails to appear at a hearing, the regulatory body or
22 hearing panel or officer may accept the allegations against the licensee in the
23 charging document as true.

24 As well as pursuant to NAC 630.470(2), which provides: "If a licensee fails to appear at a
25 scheduled hearing and no continuance has been requested and granted, the evidence may be heard
26 and the matter may be considered and disposed of on the basis of the evidence before the Board,
27 panel or hearing officer in the manner required by this section."

28 In so proceeding, Mr. Fricke asked that the matter be considered from the record, which
includes the transcript of the September 20, 2021 Summary Suspension Hearing (Volume 1,
Exhibit 19) and all exhibits submitted and admitted in support thereof (Volume 2, Exhibits 1-58),

1 which were incorporated by reference into the record of the evidentiary hearing for purposes of its
2 adjudication. Mr. Fricke then provided a closing statement, gave direction on the organization of
3 the Amended Complaint and the exhibits, and submitted the matter for consideration.

4 Having heard from Mr. Fricke regarding the circumstances underlying the initial
5 suspension of Respondent's license and the continued basis therefore; having considered the same
6 in consideration of the charges against Respondent; and there being no contradictory evidence
7 presented in either proceeding, the undersigned Hearing Officer finds as follows.

8 1. Respondent has prior felony convictions out of the State of Arizona for Conspiracy
9 to Obtain a Dangerous Drug by Fraud, a Class B felony (conviction date is October 2, 2013), and
10 Sexual Conduct with a Minor, a Class 6 felony (conviction date is August 11, 2014). Volume 2,
11 Exhibits 17-19. Respondent was granted the privilege of probation for the Conspiracy to Obtain a
12 Dangerous Drug by Fraud conviction, which was revoked based upon the violation of her
13 probation and the subsequent Sexual Conduct with a Minor conviction. Id.

14 2. Subsequent to her incarceration for the Arizona felony convictions, perhaps in
15 early October 2019, although it is not clear, Respondent began employment with Vida Spa LLC, a
16 Nevada Limited Liability Company ("Vida Spa").

17 3. On March 6, 2020, Respondent appeared before the Board in support of her then
18 submitted application to obtain licensure to practice as a physician's assistant in the State of
19 Nevada. Respondent represented to the Board that her employment with Vida Spa was contingent
20 upon her licensing and that she had not practiced clinical medicine since 2013. Volume II,
21 Exhibit 20, pg. 318.

22 4. Respondent was granted Nevada license on March 6, 2020.

23 5. On October 6, 2020, the Board received a complaint against Respondent regarding
24 patient care and bodily injury in relation to a medical procedure that Respondent performed on
25 June 27, 2020. Volume 1, Exhibit 19, p. 16; Volume II, Exhibit 30.

26 6. The IC investigated the lodged complaint and, in so doing, requested a response
27 from Respondent to several allegations of wrongdoing. No response by Respondent was
28

1 forthcoming and a subpoena duces tecum was eventually issued to Vida Spa. Volume II, Exhibits
2 30-37.

3 7. Records obtained from Vida Spa in the course of the IC's investigation against
4 Respondent demonstrate that Respondent had been practicing medicine at Vida Spa since at least
5 October 2019, six (6) months prior to her appearance before the Board referenced in paragraph 3
6 above.

7 8. The records obtained in the course of the IC's investigation demonstrate that
8 Respondent performed liposuction, a medical procedure, for Patient A on October 10, 2019;
9 Patient B on October 8, 2019; Patient C on October 9, 2019; Patient D on October 13, 2019;
10 Patient E on October 8, 2019; Patient I on June 2, 2020; Patient J on June 3, 2020; Patient K on
11 June 4, 2020; and Patient L on June 5, 2020. In addition, Respondent performed medical
12 procedures by undertaking Botox and Versa injections for Patient F on August 14, 2019; Xeomin
13 and Versa injections for Patient G on October 29, 2019; and Versa injections for Patient H on
14 November 5, 2019. Volume II, Exhibits 1 through 13, and 38-58; Volume II, Exhibit 19.

15 9. While undertaking each of the above-referenced medical procedures, Respondent
16 was not working under a supervising physician. Volume I, Exhibit 19, pp. 36, 49-51, 53; Volume
17 II, Exhibits 25, 26, and 30; *see* NRS 630.271.

18 10. The above-referenced medical procedures were performed in a facility that was not
19 a medical facility nor otherwise permitted so as to legally accommodate the administration of
20 anesthesia or sedation. Volume I, Exhibit 19, p. 73; *see* NRS 449.0151; NRS 630.373.

21 11. In undertaking the treatment of Patients A through E and I through L, Respondent,
22 who was not a licensed prescribing practitioner in that she was not licensed at the time nor under
23 the supervision of a prescribing physician (*see* NRS 453.126), prescribed controlled substances,
24 namely Tramadol; Diazepam; Alprazolam; and/or Oxycodone. Volume II, Exhibits 1 through 5, 9
25 through 13; Volume II, Exhibit 19, pp. 51-54, 59-65, 68.

26 12. Respondent performed invasive medical procedures, namely liposuction and/or fat
27 grafting on Patients A through E and I through L, without proper sedation and in a manner
28 dangerous to patient care and safety, utilizing a tumescent anesthesia with Lidocaine and

1 Epinephrine or other controlled substances from Vida Spa's general storage of controlled
2 substances, which were obtained by Respondent without a patient-specific prescription or an order
3 from a licensed prescribing and supervising practitioner, and which Respondent utilized to
4 facilitate conscious sedation. Volume II, Exhibits 1 through 5, 9 through 13; Volume II, Exhibit
5 19, pp. 59-70.

6 WHEREFORE, the undersigned hearing officer finds as follows:

7 Proper notice of the proceedings, inclusive of the evidentiary hearing, was provided to
8 Respondent and no continuance of the evidentiary hearing was sought nor granted;

9 Pursuant to NRS 622A.350(2) the undersigned accepts the allegations against Respondent
10 in the First Amended Complaint, filed June 20, 2021, as true;

11 Aside from the authority granted by NRS 622A.350(2), the undersigned hearing officer
12 finds that the IC established violations of Counts I; V; IX; XIII; XVII; XXIII; XXVIII; and
13 XXXII, Unlicensed Practice of Medicine, in that Respondent undertook the medical procedures
14 outlined in paragraph 8 herein prior to obtaining her Nevada license.

15 The undersigned hearing officer finds that the IC established violations of Counts II; VI;
16 X; XIV; XVIII; XXIV; XXIX; XXXIII; XXXVII; XLI; XLV; and XLIX, Malpractice, in that
17 Respondent failed use reasonable care, skill, or knowledge ordinarily used under similar
18 circumstances by similarly trained and experienced providers of health care in treating Patients A
19 through L by undertaking medical procedures without being properly licensed; by undertaking
20 medical procedures without required supervision; by undertaking invasive medical procedures in
21 an unpermitted and non-medical facility; by fraudulently prescribing and/or improperly
22 administering controlled substances; and/or by utilizing controlled substances in a manner that
23 deviated from standard practice for the procedures undertaken.

24 The undersigned hearing officer finds that the IC established violations of Counts III; VII;
25 XI; XV; and XIX, Fraudulent, Illegal, Unauthorized and Otherwise Inappropriate Prescribing of
26 Schedule IV Controlled Substances, in that Respondent prescribed Tramadol and/or Diazepam,
27 each of which are controlled substances, to Patients A, B, C, D, and E, and did so without the
28 involvement and supervision of a licensed prescribing practitioner and by utilizing the

1 prescription credentials of a licensed prescribing practitioner who had not seen nor treated the
2 patients to which the controlled substances were prescribed.

3 The undersigned hearing officer finds that the IC established violations of Counts IV;
4 VIII; XII; XVI; XX; XXV; XXX; XXXIV; XXXIX; XLIII; XLVII; and LI, Disreputable
5 Conduct, in that Respondent engaged in conduct that brings the medical profession into disrepute
6 by and through unethical conduct that includes having practiced medicine without a license;
7 engaging in the unsupervised practice of medicine; having performed invasive medical procedures
8 in an unpermitted and non-medical facility; having fraudulently prescribed controlled substances;
9 and/or having accessed and misused controlled substance(s) to invoke conscious sedation for
10 liposuction procedures in relation to the treatment of patients A through L.

11 The undersigned hearing officer finds that the IC established violations of Counts XXI;
12 XXII; XXVI; XXVII; and XXXI, Illegal Injection, in that Respondent injected Patients F and G
13 with Botox/Xeomin, a neuromodulator derived from clostridium botulinum, and injected Patients
14 F, G, and H with Versa, a dermal or soft tissue filler, without being licensed to practice medicine
15 at the time of the injections and did so in an unpermitted and non-medical facility.

16 The undersigned hearing officer finds that the IC established a violation of Count XXXV,
17 Fraud and Misrepresentation in Obtaining a License, in that Respondent appeared before the
18 Board on March 6, 2020, and knowingly and falsely represented that she had not practiced clinical
19 medicine since 2013 and that her job at a Las Vegas medical spa, i.e., Vida Spa, was contingent
20 upon her obtaining a license to practice in Nevada. This representation by Respondent was false
21 and was made in an attempt to obtain her Nevada medical license. Respondent had been
22 employed by and practicing medicine at Vida Spa since at least October 2019.

23 The undersigned hearing officer finds that the IC established violations of Counts XXXVI;
24 XL; XLIV; and XLVIII, Performing Medical Services Without a Supervising Physician, in that
25 Respondent performed liposuction and/or fat grafting procedures for Patients I, J, K, and L
26 without supervision by a licensed physician.

27 The undersigned hearing officer finds that the IC established violations of Counts
28 XXXVIII; XLII; XLVI; and L, Administration of Conscious Sedation at an Unaccredited and

1 Unpermitted Facility in that Respondent administered or supervised administration of conscious
2 sedation to Patients I, J, K, and L in an unpermitted, non-medical facility, namely Vida Spa.

3 The undersigned hearing officer finds that the IC established a violation of Count LII,
4 Continual Failure to Practice Medicine Property, in that Respondent continually undertook the
5 conduct complained of herein over the course of several months and while doing so failed to
6 exercise the skill or diligence or use the methods ordinarily exercised under the same
7 circumstances by physicians in good standing practicing in the same specialty or field.

8 The undersigned hearing officer finds that the IC established a violation of Count LIII,
9 Knowing or Willful Failure to Comply with an Order of the Investigative Committee, in that
10 Respondent failed to respond to the allegation letter repeatedly sent to Respondent at her last
11 known address, thus failing to comply with an order of the Board to provide requested
12 information.

13 BASED UPON THE FOREGOING, it is recommended that the Board find against
14 Respondent Tammy Lynn Hankins, PA-C as set forth herein.

15 RESPECTFULLY SUBMITTED this 16th day of November 2021.

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17 

18 Patricia Halstead, Esq., Hearing Officer for the
19 Nevada State Board of Medical Examiners
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21 Reno, NV 89509
22 (775) 322-2244
23 phalstead@halsteadlawoffices.com
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