PUBLIC COPY



Nevada State Board of Medical Examiners

IN THE MATTER OF CHARGES AND COMPLAINT AGAINST TAMMY LYNN HANKINS, PA-C ADJUDICATION

Case No: 21-51633-1

Board Meeting Date: December 3, 2021

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9600 Gateway Drive Reno, Nevada 89521

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and Complaint

Against:

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TAMMY LYNN HANKINS, PA-C,

Respondent.

Case No. 21-51633-1

FILED

JUL 2 n 2021

NEVADA STATE BOARD OF MEDICAL EXAMINERS

FIRST AMENDED COMPLAIN

The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners (Board), by and through Aaron Bart Fricke, J.D., General Counsel and attorney for the IC, having a reasonable basis to believe that Tammy Lynn Hankins, PA-C, (Respondent) violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act), hereby issues its First Amended Complaint, stating the IC's charges and allegations as follows:

RESPONDENT'S HISTORY OF CRIMINAL AND UNPROFESSIONAL CONDUCT

1. On or about March 1, 2012, in the Superior Court of the State of Arizona, in and for the County of Mohave (Arizona Court), in Case No. CR-2012-00287, a Grand Jury indicted Respondent on five (5) criminal counts of violations of Arizona law, including COUNT 1: FRAUDULENT SCHEMES AND ARTIFICES, CLASS 2 FELONY; COUNT 2: OBTAIN OR PROCURE THE ADMINISTRATION OF A NARCOTIC DRUG BY FRAUD, CLASS 3 FELONY; COUNT 3: OBTAINING A DANGEROUS DRUG BY FRAUD, CLASS 3 FELONY; COUNT 4: ATTEMPTED OBTAINING A DANGEROUS DRUG BY FRAUD, CLASS 4 FELONY; COUNT 5: ATTEMPTED OBTAINING A DANGEROUS DRUG BY FRAUD, CLASS 4 FELONY.

¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal Complaint was authorized for filing, was composed of Board members Victor M. Muro, M.D., Chair, Ms. April Mastroluca and Weldon Havins, M.D., J.D.

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Arizona Case History

2. On or about November 28, 2012, the Arizona Regulatory Board of Physician Assistants ("Arizona Board"), in Case No. PA-11-0127A, found Respondent, who had been the holder of a license to practice medicine as a physician assistant in the State of Arizona (License No. 2228), guilty of unprofessional conduct. Specifically, the Arizona Board had received information from a pharmacist alleging that Respondent had been recklessly writing prescriptions without supervision, writing abnormally large quantities of controlled drugs, and writing outside her scope of practice. Further, Respondent's supervising physician (SP) had terminated the supervision relationship with Respondent on September 13, 2011, yet Respondent proceeded to perform healthcare tasks without an SP's direction or supervision from September 13, 2011, through October 25, 2011, according to the date of the last prescribed controlled substance on the Pharmacy Monitoring Profile (which is a similar database in the State of Arizona to the Nevada Prescription Monitoring Program). On October 26, 2011, Respondent wrote two (2) prescriptions for controlled substances on a prescription pad that contained her SP's, name and DEA number. The prescriptions were issued after the SP terminated his supervisory relationship with Respondent. Arizona Board staff determined that the prescription pads did not contain Respondent's current SP information. In addition, Respondent failed to timely appear for an investigational interview with Arizona Board staff to address the quality of care issues in this case on four (4) occasions. Arizona Board staff found that Respondent failed to cooperate with the Arizona Board's investigation. A Medical Consultant (MC) reviewed the medical records of certain patients treated by Respondent to determine the quality of care provided by Respondent.

Patient JC

3. Respondent treated Patient JC for weight loss and removal of skin lesions, and Respondent started the patient on Levoxyl and Prozac. Patient JC continued to be seen by Respondent for chronic pain, and received prescriptions for Phentermine, Vicodin, Valium, Xanax and Oxycodone during the course of treatment with Respondent. Patient JC's prescriptions were reportedly stolen in March 2011. Patient JC later underwent Fraxel treatment along with Mesotherapy that reportedly required continuation of her pain medications. By October 2011,

Patient JC had not established herself with a pain specialist and again claimed that her prescriptions were stolen.

Patient MW

4. Another patient, Patient MW, received medical care in Respondent's office for a Fraxel treatment on August 23, 2011. There is no record of prescriptions written for this patient in the chart provided. Lastly, a police report made by Respondent's former SP alleged that Respondent had written thirty-nine (39) prescriptions for Patient MW between June and September of 2011, including Oxycodone, Hydrocodone, Valium, Phentermine, Xanax, and Endocet. In particular, Respondent wrote a prescription for Oxycodone 5 mg, 100 ct., and Diazepam 10 mg, 100 ct., with five refills on June 20, 2011. The record of all pharmacy prescriptions written by Respondent from November 2010 to November 2011 includes over 900 prescriptions, approximately 99% of which written by Respondent during this time period were for Phentermine, Diazepam, Alprazolam, Hydrocodone, Oxycodone, Endocet and Carisoprodol. Of particular concern to the care of Patient MW were prescriptions for Hydrocodone-acetaminophen 7.5-750 mg, 100 ct., with five (5) refills, and prescriptions for Oxycodone-acetaminophen 10-325 mg, 100 ct., Alprazolam 1 mg, 90 ct., with two (2) refills, and Meperidine 50 mg., 40 ct., on January 18, 2011.

Arizona Board Discipline

- 5. The Arizona Board determined that the standard of care when prescribing medications for patients requires documentation of the medications prescribed, indications for use and monitoring of the amounts being prescribed and noted in the medical record. The Arizona Board determined that Respondent deviated from the standard of care by inappropriately prescribing medications for patients, and that the excess prescribing of these medications can lead to addiction or overdose with a possible fatal outcome.
- 6. For the foregoing misconduct, the Arizona Board found Respondent guilty of unprofessional conduct pursuant to Arizona Revised Statute (ARS) §32-2501(18)(i) ("prescribing or dispensing controlled substances or prescription-only drugs for which the physician assistant is not approved or in excess of the amount authorized pursuant to this chapter"); ARS §32-2501(18)(j) ("any conduct or practice that is or might be harmful or dangerous to the health of a patient or the

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public"); ARS § 32-2501 (18)(p) ("failing or refusing to maintain adequate records on a patient"), and ARS § 32-2501(18)(z) ("failing to furnish legally requested information to the [Arizona Board] or its Investigator in a timely manner."). The Arizona Board also found that a practice restriction was needed in order to protect the public, and ordered that Respondent be issued a Letter of Reprimand, placed on probation for one (1) year with additional conditions and restrictions.

Respondent's Arizona License Renewal

7. Respondent's license to practice medicine as a physician assistant in the State of Arizona (License No. 2228) was due for renewal by June 1, 2013; Respondent did not renew, and her Arizona license expired by operation of law on May 20, 2014.

Criminal Conduct by Respondent in Arizona

- 8. On or about September 14, 2013, the Arizona Court found that Respondent had knowingly, intelligently and voluntarily pled guilty to the offense of: COUNT 3: OBTAINING A DANGEROUS DRUG BY FRAUD, CLASS 3 FELONY. On or about October 2, 2013, the Arizona Court entered its judgment finding Respondent guilty of the foregoing charge, and sentenced Respondent to a suspended imposition of sentence and placing the Defendant on probation for a period of four years commencing October 2, 2013, among other conditions of probation.
- 9. On or about January 17, 2014, pursuant to a Petition to Revoke Probation, the Arizona Court ordered that Respondent be held without bond pending hearing on said petition.
- 10. On or about August 11, 2014, the Arizona Court found Respondent guilty of violating her probation for the following crimes: OBTAINING A DANGEROUS DRUG BY FRAUD, CLASS 3 FELONY, and SEXUAL CONDUCT WITH A MINOR, CLASS 6 FELONY. For the first crime, Respondent was sentenced to two and one-half years with the Arizona Department of Corrections, as a minimum sentence, to date from August 11, 2014, and was given credit for two hundred eight (208) days served prior to sentencing. For the second crime, Respondent as sentenced to one (1) additional year of incarceration, that sentence to run consecutive to the other.

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Respondent's Application for a Physician Assistant License in the State of Nevada

- 11. On or about September 24, 2019, Respondent applied to the Board for a license to practice medicine as a physician assistant in the State of Nevada. On March 6, 2020, the Board met for its regularly scheduled public meeting, and considered Respondent's application in open session, at which time, Respondent informed the Board that she had not practiced clinical medicine since she had been incarcerated, and stated that, though she had secured a job at a medical spa, and planned in the future to perform plastic surgery injections, in-office procedures, excisions, and assisting with different procedures, nevertheless, she had not done so yet and the aforementioned job offer was contingent upon her obtaining a license in Nevada. At the meeting, individual Board members expressed concerns regarding her history of criminal and unprofessional conduct, and concerns about the fact that Respondent had not practiced clinical medicine since her incarceration. Nevertheless, considering that Respondent had recently recertified as a physician assistant with National Commission on Certification of Physician Assistants, which demonstrated to some extent her current clinical competency, the Board approved her application and granted her a license to practice medicine.
- 12. The Board issued to Respondent an active license to practice medicine as a physician assistant in the State of Nevada (License No. PA2277) on March 6, 2020.
- 13. Respondent was not licensed to practice medicine as a physician assistant in the State of Nevada before March 6, 2020.
- 14. Respondent does not hold an active Drug Enforcement Agency (DEA) registration, and has not held a valid registration since 2016. Respondent also does not hold and has never held an active license or registration with the Nevada State Board of Pharmacy (NSBOP).

II. STATEMENT OF LAW

- 15. Pursuant to NRS 630.020(1)-(4), the "Practice of medicine" means:
 - 1. To diagnose, treat, correct, prevent or prescribe for any human disease, ailment, injury, infirmity, deformity or other condition, physical or mental, by any means or instrumentality, including, but not limited to, the performance of an autopsy.
 - 2. To apply principles or techniques of medical science in the diagnosis or the prevention of any such conditions.

- 3. To perform any of the acts described in subsections 1 and 2 by using equipment that transfers information concerning the medical condition of the patient electronically, telephonically or by fiber optics, including, without limitation, through telehealth, from within or outside this State or the United States.
- 4. To offer, undertake, attempt to do or hold oneself out as able to do any of the acts described in subsections 1 and 2.
- 16. NRS 630.400(1)(d) provides that it is unlawful to practice medicine without being licensed under NRS Chapter 630.
- 17. Pursuant to NRS 630.400(2) and NRS 193.130(c) and (d), the unlawful practice of medicine is a felony, punishable by imprisonment in the state prison for a minimum term of not less than one (1) year and a maximum term of not more than five (5) years.
- 18. NAC 630.380(1)(m) provides that violating any provision of NRS 630.301 to 630.3065, is grounds for initiating disciplinary action against a physician assistant.
- 19. NAC 630.380(1)(f) provides that malpractice in the performance of medical services is grounds for initiating disciplinary action against a physician assistant.
- 20. NRS 630.301(4) provides that malpractice is grounds for initiating disciplinary action against a physician.
- 21. Pursuant to NAC 630.375(2) a physician assistant shall not perform medical services without supervision from his or her supervising physician, except in life-threatening and emergency situations.
- 22. Pursuant to NAC 630.370, a supervising physician is responsible for all the medical activities of his or her physician assistant and shall ensure, among other obligations, that the physician assistant performs only those medical services which have been approved by his or her supervising physician, there is strict compliance with the regulations of the State Board of Pharmacy regarding controlled substances, poisons, dangerous drugs or devices, and that the supervising physician is available at all times that his or her physician assistant is performing medical services to consult with his or her assistant.

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23. Pursuant to NAC 630.380(1)(a), willfully and intentionally making a false or fraudulent statement in applying for a license is grounds for initiating disciplinary action against a physician assistant.

- 24. Pursuant to NAC 630.380(1)(c), performing medical services otherwise than in a life-threatening or emergency situation, and at the direction or under the supervision of the supervising physician of the physician assistant is grounds for initiating disciplinary action against a physician assistant.
- 25. Pursuant to NRS 630.3065(2)(c), knowingly or willfully failing to comply with or provision of NRS Chapter 630 is grounds for initiating disciplinary action against a physician.
- 26. NAC 630.040 defines malpractice as "the failure of a physician, in treating a patient, to use the reasonable care, skill, or knowledge ordinarily used under similar circumstances."
- 27. Pursuant to 21 Code of Federal Regulations (CFR) §1306.04(a)-(b) and NRS 453.381, a physician or physician assistant may prescribe or administer controlled substances only for a legitimate medical purpose and in the usual course of his or her professional practice. The responsibility for the proper prescribing and dispensing of controlled substances is upon the prescribing practitioner, and a prescription may not be issued in order for an individual practitioner to obtain controlled substances for supplying the individual practitioner for the purpose of general dispensing to patients. 21 CFR §1306.04(a)-(b).
- 28. Pursuant to NRS 630.3062(1)(h), fraudulent, illegal, unauthorized or otherwise inappropriate prescribing, administering or dispensing of a controlled substance listed in schedule II, III or IV is grounds for initiating disciplinary action or denying licensure.
- 29. Pursuant to NRS 449.442(1)-(2), an office of a physician or a facility that provides health care, other than a medical facility (as specifically defined in NRS 449.0151), must obtain a permit pursuant to NRS 449.443 from the Nevada State Board of Health, and must maintain current accreditation by a nationally recognized organization approved by the Nevada State Board of Health, before offering to a patient a service of general anesthesia, conscious sedation or deep sedation.

30. Pursuant to NRS 630.306(1)(o), failure to comply with the requirements of NRS 630.373 is grounds for initiating discipline or denying licensure.

- 31. Pursuant to NRS 630.373(1), a physician shall not administer or supervise directly the administration of general anesthesia, conscious sedation or deep sedation to patients unless the general anesthesia, conscious sedation or deep sedation is administered: (a) in an office of a physician or osteopathic physician which holds a permit pursuant to NRS 449.435 to 449.448, inclusive; (b) in a facility which holds a permit pursuant to NRS 449.435 to 449.448, inclusive; (c) in a medical facility as that term is defined in NRS 449.0151; or (d) outside of the State of Nevada.
- 32. For the purposes of NRS 630.373, "conscious sedation" means a minimally depressed level of consciousness, produced by a pharmacologic or nonpharmacologic method, or a combination thereof, in which the patient retains the ability independently and continuously to maintain an airway and to respond appropriately to physical stimulation and verbal commands. NRS 449.436.
- 33. Pursuant to NRS 453.021, "administer" means the direct application of a controlled substance, whether by injection, inhalation, ingestion or any other means, to the body of a patient or research subject by: (1) a practitioner or, in the practitioner's presence, by the practitioner's authorized agent; or (2) the patient or research subject at the direction and in the presence of the practitioner.
- 34. Pursuant to NRS 454.217, a person shall not inject a neuromodulator that is derived from Clostridium botulinum or is biosimilar to or the bioequivalent of such a neuromodulator unless (1) the person is a physician or physician assistant licensed pursuant to NRS Chapter 630, a qualified dentist licensed pursuant to NRS 631.391, a registered nurse or advanced practice registered nurse, a physician or physician assistant licensed pursuant to NRS Chapter 633, or a qualified podiatric physician to NRS 635.086, (2) it is within his or her scope of practice, and (3) the injection occurs at a location that is either a medical facility, as defined in NRS 449.0151, or at the office of a physician or physician assistant licensed pursuant to chapter 630 or 633 of NRS, dentist, advanced practice registered nurse or podiatric physician.

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35. A person who violates any portion of NRS 454.217 is guilty of a misdemeanor. NRS 454.356

- 36. Pursuant to NRS 629.086, a person shall not inject dermal or soft tissue fillers unless (1) the person is a physician or physician assistant licensed pursuant to NRS Chapter 630, a qualified dentist licensed pursuant to NRS 631.391, a registered nurse or advanced practice registered nurse, a physician or physician assistant licensed pursuant to NRS Chapter 633, or a qualified podiatric physician to NRS 635.086, (2) it is within his or her scope of practice, and (3) the injection occurs at a location that is either a medical facility, as defined in NRS 449.0151, or at the office of a physician or physician assistant licensed pursuant to chapter 630 or 633 of NRS, dentist, advanced practice registered nurse or podiatric physician.
- 37. A person who violates any portion of NRS 629.086 is guilty of a misdemeanor. NRS 629.086(3).
- 38. Pursuant to NRS 630.306(1)(u), the failure to comply with the provisions of NRS 454.217 or 629.086 is grounds for initiating disciplinary action against a physician.
- 39. NAC 630.301(9) provides that engaging in conduct that brings the medical profession into disrepute is grounds for initiating disciplinary action against a physician assistant.

III. RESPONDENT'S UNLICENSED PRACTICE OF MEDICINE AT VIDA SPA MALPRACTICE, DISREPUTABLE CONDUCT AND RELATED VIOLATIONS OF THE NEVADA MEDICAL PRACTICE ACT.

- 40. Vida Spa LLC, a Nevada Limited Liability Company, formed July 22, 2016. managed by Gisselle Platfoot ("Vida Spa"), and also doing business as "Vida Spa" and "Vita Medical Spa Las Vegas," is a self-described "medical spa" located at 3225 S Rainbow Blvd #107 and/or #206, Las Vegas, NV 89146.
- 41. Vida Spa LLC, is licensed in Clark County, Nevada, under Clark County Business License No. 2003447.081-172, under the business category of "Cosmetology Establishment -Other Services." The owners listed under this license are Art Matrix, Inc. and Gisselle Platfoot.
- 42. Gisselle Platfoot, manager of Vida Spa LLC, at all times relevant to this complaint, did not hold a license to practice any healing art as a "provider of health care," as defined in NRS 629.031, from any occupational licensing board in the State of Nevada.

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- 43. Vida Spa is "a facility that provides health care, other than a medical facility" (NRS 449.442). Neither Respondent, Vida Spa, nor Gisselle Platfoot held, or currently holds, the requisite permit, pursuant to NRS 449.442, to perform general anesthesia, conscious sedation or deep sedation. Additionally neither Respondent, Vida Spa, nor Gisselle Platfoot held a current accreditation by a nationally recognized organization approved by the Nevada State Board of Health.
- 44. At all times relevant to this Complaint, Vida Spa was not a "medical facility," as defined in NRS 449.0151, and not "the office" of a physician or physician assistant licensed pursuant to NRS chapter 630 or 633, qualified dentist, advanced practice registered nurse or podiatric physician, as provided in NRS 454.217.
- 45. On March 24, 2021, the NSBOP issued a Citation and Order to Cease and Desist (Platfoot Citation) to Vida Spa LLC and Gisselle Platfoot, whereby the NSBOP determined that Vida Spa LLC and Gisselle Platfoot were possessing, administering, prescribing and/or dispensing controlled substances and/or dangerous drugs for Nevada patients from Vida Spa in violation of federal and state law. Specifically, the Platfoot Citation states that Vida Spa and Gisselle Platfoot did not have a dispensing registration and are therefore prohibited from possessing, dispensing and/or administering controlled substances and/or dangerous drugs. The Platfoot Citation finds that Vida Spa and Gisselle Platfoot violated, attempted to violate, assisted or abetted in the violation of or conspired to violate, without limitation, NRS 453.226, NRS 453.316, NRS 453.321(1)(a), NRS 453.331(1)(c)(d)(t)&(i), NRS 453.381(1), NRS 453.401(1)(a), NRS 639.0727, NRS 639.100(1), NRS 639.23505, NRS 639.281, NRS 639.2813, NRS 639.310, NAC 639.742, 21 U.S.C. § 822(a)(2), 21 U.S.C. § 823(f), 21 U.S.C. § 841(a), 21 U.S.C. § 842(a), 21 U.S.C. § 846 and 21 CFR §§ 1306.03-1306.05. The Platfoot Citation orders Vida Spa LLC and Gisselle Platfoot, pursuant to NRS 639.2895(1), to immediately cease and desist possessing, administering, prescribing and/or dispensing controlled substances for Nevada patients, and also assessed an administrative fine of five thousand dollars (\$5,000.00) pursuant NRS 639.2895(3).

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A. Respondent's Treatment of Patient A Without a License

- 46. Patient A² was a fifty-seven (57) year-old female at the time of the events at issue.
- 47. At all times relevant to Respondent's treatment of Patient A, the so-called "medical director" of Vida Spa was Sherman Washington, Jr., M.D.
- On October 9, 2019, Respondent, who did not have her own DEA registration and 48. controlled substance license issued by the NSBOP, utilized the prescribing credentials of Sherman Washington, Jr., M.D., to issue fraudulent prescriptions to Patient A for Tramadol (a Schedule IV Controlled Substance) 50 mg tablets, 24 ct. for days, and Diazepam (a Schedule IV Controlled Substance) 10 mg tablets, 8 ct. for 3 days; these prescriptions were called-in to the pharmacy by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and the prescriptions were filled the same day.
- 49. Respondent instructed Patient A to take Schedule IV controlled substances in a manner that materially deviated from the issued prescriptions; Respondent instructed Patient A to take Tramadol 50mg, 2 tablets, and Diazepam 10 mg, 1 tablet, at 2:00 p.m., on October 10, 2019, for the purpose of conscious sedation for an invasive, surgical liposuction procedure Respondent planned to perform on Patient A at Vida Spa at 3:00 p.m. that day.
- Patient A to deviate from the issued prescription in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal a violation by Vida Spa of NRS 449.442(1)-(2).
- 51. Dr. Washington did not see or treat Patient A, did not direct or supervise Respondent in her treatment of Patient A, and did not specifically direct Respondent to issue prescriptions to Patient A.
- 52. On October 10, 2019, at Vida Spa, at approximately 3:00 p.m., Respondent performed a liposuction procedure on the arms of Patient A. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient A, which Respondent obtained, without a

² Patient A's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint, along with identifying information for all other patients B through L referered to herein.

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patient-specific prescription or an order from a licensed practitioner for Patient A, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.

Respondent was not supervised by any licensed physician while performing this 53. invasive surgical procedure on Patient A at Vida Spa.

COUNT I

NRS 630.400(1)(d) – Unlicensed Practice of Medicine

- 54. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 55. Respondent practiced medicine without a license when she treated Patient A on October 9 and 10, 2019.
- 56. Respondent, having been previously disciplined by the Arizona Board and incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by her subsequent application to the Board for a license to practice medicine in the State of Nevada, among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.
- 57. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT II

NRS 630.301(4) - Malpractice

- 58. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 59. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient A, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient A without first obtaining a license to practice medicine in the State of Nevada, by performing an

invasive surgical procedure on Patient A, by administering tumescent anesthesia to Patient A utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, by issuing fraudulent and illegal prescriptions for controlled substances to Patient A, by instructing Patient A to take controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2), and by treating Patient A without the direct supervision of a licensed physician.

60. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT III

NRS 630.3062(1)(h) – Fraudulent, Illegal, Unauthorized and Otherwise Inappropriate Prescribing of Schedule IV Controlled Substance

- 61. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 62. As demonstrated by, but not limited to, the above-outlined facts, Respondent issued fraudulent, illegal, unauthorized and otherwise inappropriate prescriptions for Schedule IV controlled substances, Tramadol and Diazepam, to Patient A by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient A without first obtaining a license to practice medicine in the State of Nevada, a DEA registration, and a controlled substance license issued by the NSBOP, by issuing fraudulent and illegal prescriptions for these controlled substances to Patient A, by instructing Patient A to take these controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2).
- 63. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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COUNT IV

NRS 630.301(9) - Disreputable Conduct

- 64. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 65. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, knowingly, willfully and feloniously practicing medicine without first obtaining a license to practice medicine in the State of Nevada, by performing an invasive surgical procedure on Patient A, by administering tumescent anesthesia to Patient A utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, by issuing fraudulent and illegal prescriptions for Schedule IV controlled substances to Patient A, by instructing Patient A to take these controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2), and by treating Patient A without the direct supervision of a licensed physician.
- 66. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.
 - B. Respondent's Treatment of Patient B Without a License
 - 67. Patient B was a thirty-one (31) year-old female at the time of the events at issue.
- 68. At all times relevant to Respondent's treatment of Patient B, the so-called "medical director" of Vida Spa was Sherman Washington, Jr., M.D.
- 69. On October 7, 2019, Respondent, who did not have her own DEA registration and controlled substance license issued by the NSBOP, utilized the prescribing credentials of Sherman Washington, Jr., M.D., to issue fraudulent prescriptions to Patient B for Tramadol 50 mg tablets (a Schedule IV Controlled Substance), 20 ct. for 3 days, Promethazine 25 mg tablets, 12 ct. for 2 days, Sulfameth/Trimethprim 800/160 mg tablets, 20 ct. for 10 days; these prescriptions were called-in to the pharmacy by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and the prescriptions were filled the same day.

- 70. Dr. Washington did not see or treat Patient B, did not direct or supervise Respondent in her treatment of Patient B, and did not specifically direct Respondent to issue a prescription to Patient B.
- 71. On October 8, 2019, at Vida Spa, Respondent performed a liposuction procedure on the arms of Patient B. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient B, which Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner for Patient B, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.
- 72. Respondent was not supervised by any licensed physician while performing this invasive surgical procedure on Patient B at Vida Spa.

COUNT V

NRS 630.400(1)(d) – Unlicensed Practice of Medicine

- 73. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 74. Respondent practiced medicine without a license when she treated Patient B on October 7 and 8, 2019.
- 75. Respondent, having been previously disciplined by the Arizona Board and incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by her subsequent application to the Board for a license to practice medicine in the State of Nevada, among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.
- 76. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT VI

NRS 630.301(4) - Malpractice

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

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78. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient B, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient B without first obtaining a license to practice medicine in the State of Nevada, by performing an invasive surgical procedure on Patient B, by administering tumescent anesthesia to Patient B utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, by issuing a fraudulent and illegal prescription for a controlled substances to Patient B, and by treating Patient B without the direct supervision of a licensed physician.

79. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT VII

NRS 630.3062(1)(h) - Fraudulent, Illegal, Unauthorized and Otherwise Inappropriate Prescribing of Schedule IV Controlled Substance

- 80. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 81. As demonstrated by, but not limited to, the above-outlined facts, Respondent issued a fraudulent, illegal, unauthorized and otherwise inappropriate prescription for a Schedule IV controlled substances, Tramadol, to Patient B by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient B without first obtaining a license to practice medicine in the State of Nevada, a DEA registration, and a controlled substance license issued by the NSBOP, and by issuing a fraudulent and illegal prescription for a Schedule IV controlled substances to Patient B.
- 82. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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COUNT VIII

NRS 630.301(9) - Disreputable Conduct

- 83. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 84. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, knowingly, willfully and feloniously practicing medicine without first obtaining a license to practice medicine in the State of Nevada, and by performing an invasive surgical procedure on Patient B, by administering tumescent anesthesia to Patient B utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, by issuing a fraudulent and illegal prescription for a Schedule IV controlled substances to Patient B, and by treating Patient B without the direct supervision of a licensed physician.
- 85. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.
 - C. Respondent's Treatment of Patient C Without a License
 - 86. Patient C was a forty-three (43) year-old female at the time of the events at issue.
- 87. At all times relevant to Respondent's treatment of Patient C, the so-called "medical director" of Vida Spa was Sherman Washington, Jr., M.D.
- 88. On October 9, 2019, Respondent, who did not have her own DEA registration and controlled substance license issued by the NSBOP, utilized the prescribing credentials of Sherman Washington, Jr., M.D., to issue fraudulent prescriptions to Patient C for Tramadol (a Schedule IV Controlled Substance) 50 mg tablets, 24 ct. for 3 days, Diazepam (a Schedule IV Controlled Substance) 10 mg tablets, 12 ct. for 4 days, Promethazine 25 mg tablets, 20 ct for 5 days, and Sulfameth/Trimethprim 800/160 mg tablets, 20 ct. for 10 days; these prescriptions were called-in to the pharmacy by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and the prescriptions were filled the same day.
- 89. Respondent instructed Patient C to take the Schedule IV controlled substances in a manner that materially deviated from the issued prescriptions; Respondent instructed Patient C to

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take Tramadol 50mg, 2 tablets, and Diazepam 10 mg, 1 tablet, one hour in advance an invasive, surgical liposuction procedure Respondent planned to perform on Patient C at Vida Spa on October 9, 2019, for the purpose of conscious sedation.

- 90. Respondent wrote the prescriptions for these controlled substances and instructed Patient C to deviate from the issued prescription in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2).
- 91. Dr. Washington did not see or treat Patient C, did not direct or supervise Respondent in her treatment of Patient C, and did not specifically direct Respondent to issue prescriptions to Patient C.
- 92. On October 9, 2019, at Vida Spa, Respondent performed a liposuction procedure on the arms of Patient C. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient C, which Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner for Patient C, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.
- 93. Respondent was not supervised by any licensed physician while performing this invasive surgical procedure on Patient C at Vida Spa.

COUNT IX

NRS 630.400(1)(d) - Unlicensed Practice of Medicine

- 94. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 95. Respondent practiced medicine without a license when she treated Patient C on October 9, 2019.
- 96. Respondent, having been previously disciplined by the Arizona Board and incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by her subsequent application to the Board for a license to practice medicine in the State of Nevada,

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among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.

97. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT X

NRS 630.301(4) - Malpractice

- 98. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 99. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient C, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient C without first obtaining a license to practice medicine in the State of Nevada, by performing an invasive surgical procedure on Patient C, by administering tumescent anesthesia to Patient C utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, by issuing fraudulent and illegal prescriptions for controlled substances to Patient C, by instructing Patient C to take controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2), and by treating Patient C without the direct supervision of a licensed physician.
- 100. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XI

NRS 630.3062(1)(h) - Fraudulent, Illegal, Unauthorized and Otherwise Inappropriate Prescribing of Schedule IV Controlled Substance

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

fraudulent, illegal, unauthorized and otherwise inappropriate prescriptions for Schedule IV controlled substances, Tramadol and Diazepam, to Patient C by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient C without first obtaining a license to practice medicine in the State of Nevada, a DEA registration, and a controlled substance license issued by the NSBOP, by issuing fraudulent and illegal prescriptions for these controlled substances to Patient C, by instructing Patient C to take these controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2).

103. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XII

NRS 630.301(9) – Disreputable Conduct

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

by, among other misconduct, knowingly, willfully and feloniously practicing medicine without first obtaining a license to practice medicine in the State of Nevada, by performing an invasive surgical procedure on Patient C, by administering tumescent anesthesia to Patient C utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, by issuing fraudulent and illegal prescriptions for Schedule IV controlled substances to Patient C, by instructing Patient C to take these controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2), and by treating Patient C without the direct supervision of a licensed physician.

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106. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

Respondent's Treatment of Patient D Without a License D.

- 107. Patient D was a twenty-two (22) year-old female at the time of the events at issue.
- 108. At all times relevant to Respondent's treatment of Patient D, the so-called "medical director" of Vida Spa was Sherman Washington, Jr., M.D.
- On October 12, 2019, Respondent, who did not have her own DEA registration and 109. controlled substance license issued by the NSBOP, utilized the prescribing credentials of Sherman Washington, Jr., M.D., to issue fraudulent prescriptions to Patient D for Tramadol (a Schedule IV Controlled Substance) 50 mg tablets, 24 ct. for 3 days and Diazepam (a Schedule IV Controlled Substance) 10 mg tablets, 8 ct. for 3 days; on information and belief, these prescriptions were called-in to the pharmacy by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and the prescriptions were filled the same day.
- 110. On information and belief, Respondent instructed Patient D to take the Schedule IV controlled substances in a manner that materially deviated from the issued prescriptions; Respondent instructed Patient D to take Tramadol 50mg, 2 tablets, and Diazepam 10 mg, 1 tablet, one hour in advance an invasive, surgical liposuction procedure Respondent planned to perform on Patient D at Vida Spa on October 13, 2019, for the purpose of conscious sedation.
- 111. On information and belief, Respondent wrote the prescriptions for these controlled substances and instructed Patient D to deviate from the issued prescription in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2).
- Dr. Washington did not see or treat Patient D, did not direct or supervise Respondent in her treatment of Patient D, and did not specifically direct Respondent to issue prescriptions to Patient D.
- 113. On October 13, 2019, at Vida Spa, Respondent performed a liposuction procedure on the abdomen and medial inferior upper arms of Patient D. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient D, which Respondent obtained, without a

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patient-specific prescription or an order from a licensed practitioner for Patient D, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.

114. Respondent was not supervised by any licensed physician while performing this invasive surgical procedure on Patient D at Vida Spa.

COUNT XIII

NRS 630.400(1)(d) - Unlicensed Practice of Medicine

- All of the allegations contained in the above paragraphs are hereby incorporated by 115. reference as though fully set forth herein.
- 116. Respondent practiced medicine without a license when she treated Patient D on October 12 and 13, 2019.
- Respondent, having been previously disciplined by the Arizona Board and incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by her subsequent application to the Board for a license to practice medicine in the State of Nevada, among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XIV

NRS 630.301(4) - Malpractice

- 119. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient D, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient D without first obtaining a license to practice medicine in the State of Nevada, by performing an

invasive surgical procedure on Patient D, by administering tumescent anesthesia to Patient D utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, by issuing fraudulent and illegal prescriptions for controlled substances to Patient D, by instructing Patient D to take controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2), and by treating Patient D without the direct supervision of a licensed physician.

121. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XV

NRS 630.3062(1)(h) – Fraudulent, Illegal, Unauthorized and Otherwise Inappropriate Prescribing of Schedule IV Controlled Substance

- 122. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- fraudulent, illegal, unauthorized and otherwise inappropriate prescriptions for Schedule IV controlled substances, Tramadol and Diazepam, to Patient D by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient D without first obtaining a license to practice medicine in the State of Nevada, a DEA registration, and a controlled substance license issued by the NSBOP, by issuing fraudulent and illegal prescriptions for these controlled substances to Patient D, by instructing Patient D to take these controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2).
- 124. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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

COUNT XVI

NRS 630.301(9) – Disreputable Conduct

- 125. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 126. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, knowingly, willfully and feloniously practicing medicine without first obtaining a license to practice medicine in the State of Nevada, and by performing an invasive surgical procedure on Patient D, administering tumescent anesthesia to Patient D utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, issuing fraudulent prescriptions for controlled substances to Patient D, violating and attempting to conceal violations of NRS 449.442(1)-(2), and 21 CFR §1306.04(a)-(b) and NRS 453.381, and treating Patient D without the direct supervision of a licensed physician.

E. Respondent's Treatment of Patient E Without a License

- 127. Patient E was a thirty-three (33) year-old female at the time of the events at issue
- 128. At all times relevant to Respondent's treatment of Patient E, the so-called "medical director" of Vida Spa was Sherman Washington, Jr., M.D.
- 129. On October 8, 2019, Respondent, who did not have her own DEA registration and controlled substance license issued by the NSBOP, utilized the prescribing credentials of Sherman Washington, Jr., M.D., to issue a fraudulent prescription to Patient E for Tramadol (a Schedule IV Controlled Substance) 50 mg tablets, 20 ct. for 4 days, which prescription was filled the same day.
- 130. Dr. Washington did not see or treat Patient E, did not direct or supervise Respondent in her treatment of Patient E, and did not specifically direct Respondent to issue a prescription to Patient E.
- 131. On October 8, 2019, at Vida Spa, Respondent performed a liposuction procedure on the arms of Patient E. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient E, which Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner for Patient E, from a general store of controlled substances and

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dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.

132. Respondent was not supervised by any licensed physician while performing this invasive surgical procedure on Patient E at Vida Spa.

COUNT XVII

NRS 630.400(1)(d) - Unlicensed Practice of Medicine

- 133. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- Respondent practiced medicine without a license when she treated Patient E on 134. October 7 and 8, 2019.
- 135. Respondent, having been previously disciplined by the Arizona Board and incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by her subsequent application to the Board for a license to practice medicine in the State of Nevada, among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.
- By reason of the foregoing, Respondent is subject to discipline by the Board as 136. provided in NRS 630.352.

COUNT XVIII

NRS 630.301(4) - Malpractice

- 137. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient E, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient E without first obtaining a license to practice medicine in the State of Nevada, by performing an invasive surgical procedure on Patient E, by administering tumescent anesthesia to Patient E utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous

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drugs used for general administration and dispensing to patients, by issuing a fraudulent and illegal prescription for a controlled substances to Patient E, and by treating Patient E without the direct supervision of a licensed physician.

By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XIX

NRS 630.3062(1)(h) - Fraudulent, Illegal, Unauthorized and Otherwise Inappropriate **Prescribing of Schedule IV Controlled Substance**

- All of the allegations contained in the above paragraphs are hereby incorporated by 140. reference as though fully set forth herein.
- 141. As demonstrated by, but not limited to, the above-outlined facts, Respondent issued a fraudulent, illegal, unauthorized and otherwise inappropriate prescription for a Schedule IV controlled substances, Tramadol, to Patient E by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient E without first obtaining a license to practice medicine in the State of Nevada, a DEA registration, and a controlled substance license issued by the NSBOP, and by issuing a fraudulent and illegal prescription for a Schedule IV controlled substances to Patient E.
- 142. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XX

NRS 630.301(9) – Disreputable Conduct

- 143. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 144. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, knowingly, willfully and feloniously practicing medicine without first obtaining a license to practice medicine in the State of Nevada, and by performing an invasive surgical procedure on Patient E, by administering tumescent anesthesia to Patient E utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous

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drugs used for general administration and dispensing to patients, by issuing a fraudulent and illegal prescription for a Schedule IV controlled substances to Patient E, and by treating Patient E without the direct supervision of a licensed physician.

145. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

F. Respondent's Treatment of Patient F Without a License

- 146. Patient F was a male of unknown age at the time of the events at issue.
- At all times relevant to Respondent's treatment of Patient F, the so-called "medical 147. director" of Vida Spa was Sherman Washington, Jr., M.D.
- 148. On October 24, 2019, Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner for Patient F, "Botox," a neuromodulator that is derived from Clostridium botulinum or is biosimilar to or the bioequivalent of such a neuromodulator, and "Versa," a hyaluronic acid dermal filler, both of which are dangerous drugs as defined by NRS 454.201, from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients.
- Dr. Washington did not see or treat Patient F, and did not direct or supervise 149. Respondent in her treatment of Patient F.
- 150. On October 24, 2019, at Vida Spa, Respondent injected, and thereby administered pursuant to NRS 454.191, the aforementioned Botox and Versa into various locations on the face of Patient F.
- 151. Respondent was not supervised by any licensed physician while performing this injection procedure on Patient F at Vida Spa.

COUNT XXI

NRS 630.306(1)(u) - Illegal Injection of Botox

All of the allegations contained in the above paragraphs are hereby incorporated by 152. reference as though fully set forth herein.

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153. As demonstrated by, but not limited to, the above-outlined facts, Respondent injected Botox into the face of Patient F in violation of NRS 629.086 when she did so without a license to practice any form of medicine pursuant to NRS Chapter 630, NRS 631.391, NRS Chapter 633, or NRS 635.086, and at a location that is neither a medical facility, as defined in NRS 449.0151, nor at the office of a physician or physician assistant, licensed pursuant to NRS Chapters 630 or 633, dentist, advanced practice registered nurse or podiatric physician.

By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXII

NRS 630.306(1)(u) – Illegal Injection of Versa

- 155. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- As demonstrated by, but not limited to, the above-outlined facts, Respondent injected Versa into the face of Patient F in violation of NRS 454.217 when she did so without a license to practice any form of medicine pursuant to NRS Chapter 630, NRS 631.391, NRS Chapter 633, or NRS 635.086, and at a location that is neither a medical facility, as defined in NRS 449.0151, nor at the office of a physician or physician assistant, licensed pursuant to NRS Chapters 630 or 633, dentist, advanced practice registered nurse or podiatric physician.
- 157. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXIII

NRS 630.400(1)(d) – Unlicensed Practice of Medicine

- 158. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 159. Respondent practiced medicine without a license when she treated Patient F on October 24, 2019.
- Respondent, having been previously disciplined by the Arizona Board and incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her

license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by her subsequent application to the Board for a license to practice medicine in the State of Nevada, among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.

161. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXIV

NRS 630.301(4) - Malpractice

- 162. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 163. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient F, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient F without first obtaining a license to practice medicine in the State of Nevada, and by obtaining, without a patient-specific prescription or an order from a licensed practitioner for Patient F, dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs, and by injecting Botox and Versa into the face of Patient F in violation of NRS 629.086 and NRS 454.217, respectively, and by treating Patient F without the direct supervision of a licensed physician.
- 164. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXV

NRS 630.301(9) – Disreputable Conduct

- 165. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 166. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, knowingly, willfully and feloniously practicing medicine with

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respect to Patient F without first obtaining a license to practice medicine in the State of Nevada, and by obtaining, without a patient-specific prescription or an order from a licensed practitioner for Patient F, dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs, and by injecting Botox and Versa into the face of Patient F in violation of NRS 629.086 and NRS 454.217, respectively, and by treating Patient F without the direct supervision of a licensed physician.

167. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

G. Respondent's Treatment of Patient G Without a License

- 168. Patient G was a sixty-six (66) year-old female at the time of the events at issue.
- 169. At all times relevant to Respondent's treatment of Patient G, the so-called "medical director" of Vida Spa was Sherman Washington, Jr., M.D.
- 170. On October 29, 2019, Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner for Patient G, "Xeomin," a neuromodulator that is derived from Clostridium botulinum or is biosimilar to or the bioequivalent of such a neuromodulator, and "Versa," a hyaluronic acid dermal filler, both of which are dangerous drugs as defined by NRS 454.201, from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients.
- 171. Dr. Washington did not see or treat Patient G, did not direct or supervise Respondent in her treatment of Patient G.
- 172. On October 24, 2019, at Vida Spa, Respondent injected, and thereby administered pursuant to NRS 454.191, the aforementioned Xeomin and Versa into various locations on the face of Patient G.
- Respondent was not supervised by any licensed physician while performing this 173. injection procedure on Patient G at Vida Spa.

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COUNT XXVI

NRS 630.306(1)(u) – Illegal Injection of Xeomin

- 174. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- As demonstrated by, but not limited to, the above-outlined facts, Respondent injected Xeomin into the face of Patient G in violation of NRS 629.086 when she did so without a license to practice any form of medicine pursuant to NRS Chapter 630, NRS 631.391, NRS Chapter 633, or NRS 635.086, and at a location that is neither a medical facility, as defined in NRS 449.0151, nor at the office of a physician or physician assistant, licensed pursuant to NRS Chapters 630 or 633, dentist, advanced practice registered nurse or podiatric physician.
- 176. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXVII

NRS 630.306(1)(u) – Illegal Injection of Versa

- All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 178. As demonstrated by, but not limited to, the above-outlined facts, Respondent injected Versa into the face of Patient G in violation of NRS 454.217 when she did so without a license to practice any form of medicine pursuant to NRS Chapter 630, NRS 631.391, NRS Chapter 633, or NRS 635.086, and at a location that is neither a medical facility, as defined in NRS 449.0151, nor at the office of a physician or physician assistant, licensed pursuant to NRS Chapters 630 or 633, dentist, advanced practice registered nurse or podiatric physician.
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXVIII

NRS 630.400(1)(d) – Unlicensed Practice of Medicine

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

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181. Respondent practiced medicine without a license when she treated Patient G on October 29, 2019.

Respondent, having been previously disciplined by the Arizona Board and incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by her subsequent application to the Board for a license to practice medicine in the State of Nevada, among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.

By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXIX

NRS 630.301(4) - Malpractice

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

185. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient G, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient G without first obtaining a license to practice medicine in the State of Nevada, and by obtaining, without a patient-specific prescription or an order from a licensed practitioner for Patient G, dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs, and by injecting Xeomin and Versa into the face of Patient G in violation of NRS 629.086 and NRS 454.217, respectively, and by treating Patient G without the direct supervision of a licensed physician.

By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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COUNT XXX

NRS 630.301(9) – Disreputable Conduct

- 187. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient G without first obtaining a license to practice medicine in the State of Nevada, and by obtaining, without a patient-specific prescription or an order from a licensed practitioner for Patient G, dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs, and by injecting Xeomin and Versa into the face of Patient G in violation of NRS 629.086 and NRS 454.217, respectively, and by treating Patient G without the direct supervision of a licensed physician.
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

H. Respondent's Treatment of Patient H Without a License

- 190. Patient H was a forty-two (42) year-old person of unknown gender at the time of the events at issue.
- 191. At all times relevant to Respondent's treatment of Patient H, Vida Spa had no socalled "medical director," the directorship of Dr. Sherman Washington having terminated on November 1, 2019.
- At all times relevant to Respondent's treatment of Patient H, the only parties 192. responsible for Vida Spa's activities with respect to Patient H were Respondent and, on information and belief, the parties listed on Clark County Business License No. 2003447.081-172. under the business category of "Cosmetology Establishment - Other Services," the owners of Vida Spa: Art Matrix, Inc. and Gisselle Platfoot.
- 193. On November 5, 2019 obtained, without a patient-specific prescription or an order from a licensed practitioner for Patient H, "Versa," a hyaluronic acid dermal filler, a dangerous ///

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drug as defined by NRS 454.201, from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients.

- 194. On November 5, 2019, at Vida Spa, Respondent injected, and thereby administered pursuant to NRS 454.191, the aforementioned Versa into various locations on the face of Patient H.
- 195. Respondent was not supervised by any licensed physician while performing this injection procedure on Patient H at Vida Spa.

COUNT XXXI

NRS 630.306(1)(u) – Illegal Injection of Versa

- 196. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 197. As demonstrated by, but not limited to, the above-outlined facts, Respondent injected Versa into the face of Patient H in violation of NRS 454.217 when she did so without a license to practice any form of medicine pursuant to NRS Chapter 630, NRS 631.391, NRS Chapter 633, or NRS 635.086, and at a location that is neither a medical facility, as defined in NRS 449.0151, nor at the office of a physician or physician assistant, licensed pursuant to NRS Chapters 630 or 633, dentist, advanced practice registered nurse or podiatric physician.
- 198. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXXII

NRS 630.400(1)(d) – Unlicensed Practice of Medicine

- 199. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 200. Respondent practiced medicine without a license when she treated Patient H on November 5, 2019.
- Respondent, having been previously disciplined by the Arizona Board and incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by

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her subsequent application to the Board for a license to practice medicine in the State of Nevada, among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.

202. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXXIII

NRS 630.301(4) - Malpractice

- 203. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 204. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient H, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient H without first obtaining a license to practice medicine in the State of Nevada, and by obtaining, without a patient-specific prescription or an order from a licensed practitioner for Patient H. dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs, and by injecting Versa into the face of Patient H in violation of NRS 454.217, and by treating Patient H without the direct supervision of a licensed physician.
- 205. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXXIV

NRS 630.301(9) - Disreputable Conduct

- 206. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 207. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient H, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient H without first obtaining a license to practice medicine in the

State of Nevada, and by obtaining, without a patient-specific prescription or an order from a licensed practitioner for Patient H, dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs, and by injecting Versa into the face of Patient H in violation of NRS 454.217, and by treating Patient H without the direct supervision of a licensed physician.

208. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

IV. RESPONDENT'S FRAUD IN OBTAINING LICENSURE

COUNT XXXV

NRS 630.304(1) - Fraud and Misrepresentation in Obtaining a License

- 209. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 210. As demonstrated by, but not limited to, the above-outlined facts, Respondent obtained a license to practice medicine by fraud, misrepresentation and false, misleading, inaccurate and incomplete statements when, on March 6, 2020, in a public meeting of the Board, when the Board was considering her application for licensure as a physician assistant in the State of Nevada, in open session, Respondent informed the Board that she had not practiced clinical medicine since she had been incarcerated, and stated that, though she had secured a job at a medical spa, and planned in the future to perform plastic surgery injections, in-office procedures, excisions, and assisting with different procedures, nevertheless, she had not done so yet and the aforementioned job offer was contingent upon her obtaining a license in Nevada.
- 211. As demonstrated by, but not limited to, the above-outlined facts, Respondent's statements to the Board on March 6, 2020, were materially false and Respondent knew they were materially false when she made the statements.
- 212. As demonstrated by, but not limited to, the above-outlined facts, Respondent's statements to the Board on March 6, 2020, were knowing misrepresentations of the truth and made to conceal material facts that would have prevented her from obtaining licensure.
- 213. As demonstrated by, but not limited to, the above-outlined facts, Respondent's statements to the Board on March 6, 2020, were intentionally misleading, and made to induce the

Board to act to the detriment of the public safety by issuing her a license to practice medicine, despite the fact that she had already been knowingly, willingly, feloniously practicing medicine without a license.

- 214. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.
- V. RESPONDENT'S PERFORMANCE OF MEDICAL SERVICES WITHOUT A SUPERVISING PHYSICIAN, ADMINISTRATION OF CONSCIOUS SEDATION AT VIDA SPA, AN UNPERMITTED AND UNACCREDITED FACILITY PURSUANT TO NRS 449.442, AND RELATED VIOLATIONS OF THE NEVADA MEDICAL PRACTICE ACT
 - I. Respondent's Treatment of Patient I
 - 215. Patient I was a twenty-nine (29) year-old female at the time of the events at issue.
- 216. At all times relevant to Respondent's treatment of Patient I, the so-called "medical director" of Vida Spa was Salvador Borromeo, III, M.D.
- 217. At all times relevant to Respondent's treatment of Patient I, Respondent did not have a supervising physician, and did not have a supervising physician agreement on file with and accepted by the Board, and was therefore expressly prohibited from performing medical services pursuant to NAC 630.375(2).
- 218. The medical services rendered to Patient I by Respondent did not occur in a life-threatening or emergency situation.
- 219. On June 1, 2020, Respondent, who did not have her own DEA registration and controlled substance license issued by the NSBOP, utilized the prescribing credentials of Salvador Borromeo, III, M.D., to issue prescriptions to Patient I for Oxycodone-acetaminophen (a Schedule II Controlled Substance) 5-325 mg tablets, 12 ct. for 3 days; Alprazolam (a Schedule IV Controlled Substance) 1 mg tablets, 4 ct. for 2 days; Promethazine 25 mg tablets, 10 ct. for 2 days, Sulfameth/Trimethprim 800/160 mg tablets, 20 ct. for 10 days.
- 220. Respondent issued prescriptions for these controlled substances and dangerous drugs by using the pre-printed prescription pad of Salvador Borromeo, III, M.D., which contained his pre-printed DEA number; the prescription was completed by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, with Patient I's name and with the

corresponding medications, quantities and doses. Respondent, or a Vida Spa employee or agent acting at Respondent's direction, presented the prescription to Dr. Borromeo, who then signed the prescription with the understanding that the controlled substances and dangerous drugs would then be used by Respondent on Patient I for the purpose of performing an invasive surgical procedure on Patient I.

- 221. The material purpose for prescribing the controlled substances to Patient I was conscious sedation and pain control for an invasive surgical procedure to be performed on Patient I.
- 222. Dr. Borromeo's express purpose in signing the already completed written prescriptions for controlled substances for Patient I was for conscious sedation and pain control for invasive surgical procedure to be performed on Patient I.
- Pharmacy Santa Maria, at 3827 E. Sunset Rd, Ste L, Las Vegas, Nevada 89120, which filled the prescription, and the controlled substances and dangerous drugs were then delivered directly to Vida Spa. The controlled substances and dangerous drugs were accepted at Vida Spa by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and then administered to Patient I by Respondent, or by a Vida Spa employee or agent supervised directly by Respondent.
- 224. Respondent, a Vida Spa employee or agent acting at Respondent's direction in the Respondent's presence, or Patient I at the direction and in the presence of Respondent, directly administered to Patient I the controlled substances, Alprazolam and Oxycodone-acetominophen, by ingestion.
- 225. Dr. Borromeo did not see or treat Patient I, and did not direct or supervise Respondent in her treatment of Patient I.
- 226. On June 2, 2020, at Vida Spa, Respondent performed a liposuction procedure on the upper and lower abdomen and arms of Patient I, and a fat grafting procedure to Patient I's breasts. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient I, which Respondent obtained, without a patient-specific prescription or an order from a

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licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient I, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.

227. Respondent was not supervised by any licensed physician while performing this invasive surgical procedure on Patient I at Vida Spa.

COUNT XXXVI

NAC 630.380(1)(c) - Performing Medical Services Without A Supervising Physician

- 228. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 229. Respondent performed medical services without the direction and supervision of a supervising physician, and in a non-emergency and non-life-threatening situation, when she treated Patient I on June 1 and 2, 2020.
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXXVII

NRS 630.301(4) - Malpractice

- 231. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 232. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient I by performing an invasive surgical procedure on Patient I without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient I utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient I, by administering or directly supervising the administration of conscious sedation to Patient I, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).

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By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXXVIII

NRS 630.306(1)(0) – Administration of Conscious Sedation at an Unaccredited and **Unpermitted Facility**

- 234. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 235. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed to comply with NRS 630.373 when rendering medical services to Patient I, by, among other misconduct, administering and/or supervising directly the administration of conscious sedation to Patient I for an invasive surgical procedure that Respondent performed on Patient I at Vida Spa, which is not the office of a physician or osteopathic physician which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, not a facility which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, and not a medical facility as that term is defined in NRS 449.0151, and which is located inside the State of Nevada.
- 236. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXXIX

NRS 630.301(9) – Disreputable Conduct

- 237. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, by performing an invasive surgical procedure on Patient I without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient I utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patientspecific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient I, by administering or directly supervising the

administration of conscious sedation to Patient I, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).

239. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

J. Respondent's Treatment of Patient J

- 240. Patient J was a forty (40) year-old female at the time of the events at issue.
- 241. At all times relevant to Respondent's treatment of Patient J, the so-called "medical director" of Vida Spa was Salvador Borromeo, III, M.D.
- 242. At all times relevant to Respondent's treatment of Patient J, Respondent did not have a supervising physician, and did not have a supervising physician agreement on file with and accepted by the Board, and was therefore expressly prohibited from performing medical services pursuant to NAC 630.375(2).
- 243. The medical services rendered to Patient J by Respondent did not occur in a life-threatening or emergency situation.
- 244. On June 2, 2020, Respondent, who did not have her own DEA registration and controlled substance license issued by the NSBOP, utilized the prescribing credentials of Salvador Borromeo, III, M.D., to issue prescriptions to Patient J for Oxycodone-acetaminophen (a Schedule II Controlled Substance) 5-325 mg tablets, 12 ct. for 3 days; Alprazolam (a Schedule IV Controlled Substance) 1 mg tablets, 4 ct. for 2 days; Promethazine 25 mg tablets, 10 ct. for 2 days, Sulfameth/Trimethprim 800/160 mg tablets, 20 ct. for 10 days.
- 245. Respondent issued prescriptions for these controlled substances and dangerous drugs by using the pre-printed prescription pad of Salvador Borromeo, III, M.D., which contained his pre-printed DEA number; the prescription was completed by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, with Patient J's name and with the corresponding medications, quantities and doses. Respondent, or a Vida Spa employee or agent acting at Respondent's direction, presented the prescription to Dr. Borromeo, who then signed the prescription with the understanding that the controlled substances and dangerous drugs

would then be used by Respondent on Patient J for the purpose of performing an invasive surgical procedure on Patient J.

- 246. The material purpose for prescribing the controlled substances to Patient J was conscious sedation and pain control for an invasive surgical procedure to be performed on Patient J.
- 247. Dr. Borromeo's express purpose in signing the already completed written prescriptions for controlled substances for Patient J was for conscious sedation and pain control for invasive surgical procedure to be performed on Patient J.
- 248. The written prescription issued for Patient J in this manner was then presented to Pharmacy Santa Maria, at 3827 E. Sunset Rd, Ste L, Las Vegas, Nevada 89120, which filled the prescription, and the controlled substances and dangerous drugs were then delivered directly to Vida Spa. The controlled substances and dangerous drugs were accepted at Vida Spa by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and then administered to Patient J by Respondent, or by a Vida Spa employee or agent supervised directly by Respondent.
- 249. Respondent, a Vida Spa employee or agent acting at Respondent's direction in the Respondent's presence, or Patient J at the direction and in the presence of Respondent, directly administered to Patient J the controlled substances, Alprazolam and Oxycodone-acetominophen, by ingestion.
- 250. Dr. Borromeo did not see or treat Patient J, and did not direct or supervise Respondent in her treatment of Patient J.
- 251. On June 3, 2020, at Vida Spa, Respondent performed a liposuction procedure on Patient J. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient J, which Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient J, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.

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252. Respondent was not supervised by any licensed physician while performing this invasive surgical procedure on Patient J at Vida Spa.

COUNT XL

NAC 630.380(1)(c) - Performing Medical Services Without A Supervising Physician

- 253. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- Respondent performed medical services without the direction and supervision of a 254. supervising physician, and in a non-emergency and non-life-threatening situation, when she treated Patient J on June 2 and 3, 2020.
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XLI

NRS 630.301(4) - Malpractice

- 256. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 257. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient J by performing an invasive surgical procedure on Patient J without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient J utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient J, by administering or directly supervising the administration of conscious sedation to Patient J, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).
- 258. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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COUNT XLII

NRS 630.306(1)(0) – Administration of Conscious Sedation at an Unaccredited and Unpermitted Facility

- 259. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 260. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed to comply with NRS 630.373 when rendering medical services to Patient J, by, among other misconduct, administering and/or supervising directly the administration of conscious sedation to Patient J for an invasive surgical procedure that Respondent performed on Patient J at Vida Spa, which is not the office of a physician or osteopathic physician which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, not a facility which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, and not a medical facility as that term is defined in NRS 449.0151, and which is located inside the State of Nevada.
- 261. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XLIII

NRS 630.301(9) - Disreputable Conduct

- 262. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 263. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, by performing an invasive surgical procedure on Patient J without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient J utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient J, by administering or directly supervising the administration of conscious sedation to Patient J, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).

264. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

K. Respondent's Treatment of Patient K

- 265. Patient K was a thirty-five (35) year-old female at the time of the events at issue.
- 266. At all times relevant to Respondent's treatment of Patient K, the so-called "medical director" of Vida Spa was Salvador Borromeo, III, M.D.
- 267. At all times relevant to Respondent's treatment of Patient K, Respondent did not have a supervising physician, and did not have a supervising physician agreement on file with and accepted by the Board, and was therefore expressly prohibited from performing medical services pursuant to NAC 630.375(2).
- 268. The medical services rendered to Patient K by Respondent did not occur in a life-threatening or emergency situation.
- 269. On June 3, 2020, Respondent, who did not have her own DEA registration and controlled substance license issued by the NSBOP, utilized the prescribing credentials of Salvador Borromeo, III, M.D., to issue prescriptions to Patient K for Oxycodone-acetaminophen (a Schedule II Controlled Substance) 5-325 mg tablets, 12 ct. for 3 days; Alprazolam (a Schedule IV Controlled Substance) 1 mg tablets, 4 ct. for 2 days; Promethazine 25 mg tablets, 10 ct. for 2 days, Sulfameth/Trimethprim 800/160 mg tablets, 20 ct. for 10 days.
- 270. Respondent issued prescriptions for these controlled substances and dangerous drugs by using the pre-printed prescription pad of Salvador Borromeo, III, M.D., which contained his pre-printed DEA number; the prescription was completed by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, with Patient K's name and with the corresponding medications, quantities and doses. Respondent, or a Vida Spa employee or agent acting at Respondent's direction, presented the prescription to Dr. Borromeo, who then signed the prescription with the understanding that the controlled substances and dangerous drugs would then be used by Respondent on Patient K for the purpose of performing an invasive surgical procedure on Patient K.

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271. The material purpose for prescribing the controlled substances to Patient K was conscious sedation and pain control for an invasive surgical procedure to be performed on Patient K.

- 272. Dr. Borromeo's express purpose in signing the already completed written prescriptions for controlled substances for Patient K was for conscious sedation and pain control for invasive surgical procedure to be performed on Patient K.
- The written prescription issued for Patient K in this manner was then presented to Pharmacy Santa Maria, at 3827 E. Sunset Rd, Ste L, Las Vegas, Nevada 89120, which filled the prescription, and the controlled substances and dangerous drugs were then delivered directly to Vida Spa. The controlled substances and dangerous drugs were accepted at Vida Spa by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and then administered to Patient K by Respondent, or by a Vida Spa employee or agent supervised directly by Respondent.
- 274. Respondent, a Vida Spa employee or agent acting at Respondent's direction in the Respondent's presence, or Patient K at the direction and in the presence of Respondent, directly administered to Patient K the controlled substances, Alprazolam and Oxycodone-acetominophen, by ingestion.
- Dr. Borromeo did not see or treat Patient K, and did not direct or supervise Respondent in her treatment of Patient K.
- 276. On June 4, 2020, at Vida Spa, Respondent performed a liposuction procedure on the upper back and flanks of Patient K. On information and belief, Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient K, which Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient K, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.
- 277. Respondent was not supervised by any licensed physician while performing this invasive surgical procedure on Patient K at Vida Spa.

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COUNT XLIV

NAC 630.380(1)(c) – Performing Medical Services Without A Supervising Physician

- 278. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 279. Respondent performed medical services without the direction and supervision of a supervising physician, and in a non-emergency and non-life-threatening situation, when she treated Patient K on June 3 and 4, 2020.
- 280. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XLV

NRS 630.301(4) - Malpractice

- 281. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 282. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient K by performing an invasive surgical procedure on Patient K without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient K utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient K, by administering or directly supervising the administration of conscious sedation to Patient K, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).
- 283. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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COUNT XLVI

NRS 630.306(1)(0) – Administration of Conscious Sedation at an Unaccredited and Unpermitted Facility

- 284. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 285. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed to comply with NRS 630.373 when rendering medical services to Patient K, by, among other misconduct, administering and/or supervising directly the administration of conscious sedation to Patient K for an invasive surgical procedure that Respondent performed on Patient K at Vida Spa, which is not the office of a physician or osteopathic physician which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, not a facility which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, and not a medical facility as that term is defined in NRS 449.0151, and which is located inside the State of Nevada.
- 286. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XLVII

NRS 630.301(9) – Disreputable Conduct

- 287. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 288. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, by performing an invasive surgical procedure on Patient K without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient K utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient K, by administering or directly supervising the administration of conscious sedation to Patient K, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).

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By reason of the foregoing, Respondent is subject to discipline by the Board as 289. provided in NRS 630.352.

L. Respondent's Treatment of Patient L

- 290. Patient L was a forty (40) year-old female at the time of the events at issue.
- 291. At all times relevant to Respondent's treatment of Patient L, the so-called "medical director" of Vida Spa was Salvador Borromeo, III, M.D.
- At all times relevant to Respondent's treatment of Patient L, Respondent did not 292. have a supervising physician, and did not have a supervising physician agreement on file with and accepted by the Board, and was therefore expressly prohibited from performing medical services pursuant to NAC 630.375(2).
- 293. The medical services rendered to Patient L by Respondent did not occur in a lifethreatening or emergency situation.
- On June 4, 2020, Respondent, who did not have her own DEA registration and controlled substance license issued by the NSBOP, utilized the prescribing credentials of Salvador Borromeo, III, M.D., to issue prescriptions to Patient L for Oxycodone-acetaminophen (a Schedule II Controlled Substance) 5-325 mg tablets, 12 ct. for 3 days; Alprazolam (a Schedule IV Controlled Substance) 1 mg tablets, 4 ct. for 2 days; Promethazine 25 mg tablets, 10 ct. for 2 days, Sulfameth/Trimethprim 800/160 mg tablets, 20 ct. for 10 days.
- 295. Respondent issued prescriptions for these controlled substances and dangerous drugs by using the pre-printed prescription pad of Salvador Borromeo, III, M.D., which contained his pre-printed DEA number; the prescription was completed by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, with Patient L's name and with the corresponding medications, quantities and doses. Respondent, or a Vida Spa employee or agent acting at Respondent's direction, presented the prescription to Dr. Borromeo, who then signed the prescription with the understanding that the controlled substances and dangerous drugs would then be used by Respondent on Patient L for the purpose of performing an invasive surgical procedure on Patient L.

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296. The material purpose for prescribing the controlled substances to Patient L was conscious sedation and pain control for an invasive surgical procedure to be performed on Patient L.

- 297. Dr. Borromeo's express purpose in signing the already completed written prescriptions for controlled substances for Patient L was for conscious sedation and pain control for invasive surgical procedure to be performed on Patient L.
- The written prescription issued for Patient L in this manner was then presented to Pharmacy Santa Maria, at 3827 E. Sunset Rd, Ste L, Las Vegas, Nevada 89120, which filled the prescription, and the controlled substances and dangerous drugs were then delivered directly to Vida Spa. The controlled substances and dangerous drugs were accepted at Vida Spa by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and then administered to Patient L by Respondent, or by a Vida Spa employee or agent supervised directly by Respondent.
- Respondent, a Vida Spa employee or agent acting at Respondent's direction in the Respondent's presence, or Patient L at the direction and in the presence of Respondent, directly administered to Patient L the controlled substances, Alprazolam and Oxycodone-acetominophen, by ingestion.
- 300. Dr. Borromeo did not see or treat Patient L, and did not direct or supervise Respondent in her treatment of Patient L.
- 301. On June 5, 2020, at Vida Spa, Respondent performed a liposuction procedure on the abdomen, flanks back and "bra straps" of Patient L, and a fat transfer to the buttocks of Patient L. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient L, which Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwised authorized to perform medical services for Patient L, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.
- 302. Respondent was not supervised by any licensed physician while performing this invasive surgical procedure on Patient L at Vida Spa.

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COUNT XLVIII

NAC 630.380(1)(a) - Performing Medical Services Without A Supervising Physician

- 303. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 304. Respondent performed medical services without the direction and supervision of a supervising physician, and in a non-emergency and non-life-threatening situation, when she treated Patient L on June 4 and 5, 2020.
- By reason of the foregoing, Respondent is subject to discipline by the Board as 305. provided in NRS 630.352.

COUNT XLIX

NRS 630.301(4) - Malpractice

- All of the allegations contained in the above paragraphs are hereby incorporated by 306. reference as though fully set forth herein.
- 307. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient L by performing an invasive surgical procedure on Patient L without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient L utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient L, by administering or directly supervising the administration of conscious sedation to Patient L, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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COUNT L

NRS 630.306(1)(o) - Administration of Conscious Sedation at an Unaccredited and **Unpermitted Facility**

- 309. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 310. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed to comply with NRS 630.373 when rendering medical services to Patient L, by, among other misconduct, administering and/or supervising directly the administration of conscious sedation to Patient L for an invasive surgical procedure that Respondent performed on Patient L at Vida Spa, which is not the office of a physician or osteopathic physician which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, not a facility which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, and not a medical facility as that term is defined in NRS 449.0151, and which is located inside the State of Nevada.
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT LI

NRS 630.301(9) – Disreputable Conduct

- 312. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 313. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, by performing an invasive surgical procedure on Patient L without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient L utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patientspecific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient L, by administering or directly supervising the administration of conscious sedation to Patient L, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).

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314. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

V. RESPONDENT'S CONTINUAL FAILURE TO ENGAGE IN THE PRACTICE OF MEDICINE IN A PROFESSIONAL MANNER

COUNT LII

NRS 630.306(1)(g) - Continual Failure to Practice Medicine Properly

- 315. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 316. As demonstrated by, but not limited to, the above-outlined facts, by abundantly and abidingly demonstrating through numerous, repeated, knowing, willful and criminal failures, both before and after her licensure in this state, by engaging in the unlicensed practice of medicine, committing malpractice, violating state and federal laws pertaining to the proper handling, prescription and administration of dangerous drugs and controlled substances, performing medical services without a supervising physician, and obtaining licensure in this state by fraud and misrepresentation, among other serious violations, Respondent has continually failed to exercise the skill and diligence and use the methods ordinarily exercised under the same circumstances by physicians in good standing practicing in the same specialty or field.
- 317. Respondent's conduct, considered in its entirety, is extraordinarily and persistently unprofessional in character.
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT LIII

NRS 630.3065(2)(a) - Knowing or Willful Failure to Comply with an Order of the **Investigative Committee**

All of the allegations contained in the above paragraphs are hereby incorporated by 319. reference as though fully set forth herein.

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	320.	Pursuant to	NRS 630.3065(2)(a), knowingly or willfully failing to comply with	ar
order	of the	Investigative	Committee of the Board is grounds for disciplinary action or deny	ing
licensu	ıre.			

- 321. The IC is investigating complaints related to instances of alleged malpractice and serious patient injury caused by Licensee, in furtherance of which the IC has issued an Order to Produce Healthcare Records ("Order for Records") pursuant to its authority pursuant to NRS 630.311(1), and issued an allegation letter, both of which lawfully command a response from Licensee.
- 322. Pursuant to NRS 630.254, Licensee is required to maintain a permanent mailing address with the Board to which all communications from the Board to the licensee must be sent.
- 323. The IC sent its allegation letter to Licensee by USPS Regular Mail addressed to Licensee's address of record on or about December 17, 2020.
- 324. The IC sent its allegation letter and Order for Records to Licensee by USPS Regular Mail addressed to Licensee's address of record on or about January 29, 2021.
- 325. The IC sent its allegation letter and Order for Records to Licensee by USPS. Certified Mail addressed to Licensee's address of record on or about February 26, 2021, which was certified delivered on March 1, 2021.
- 326. The IC sent its allegation letter and Order for Records to Licensee via email to the email address on file with the Board on or about March 19, 2021.
- 327. The IC sent its allegation letter and Order for Records to Licensee by FedEx Ground to Licensee's address of record on or about June 28, 2021, which was delivered on July 1, 2021.
- 328. As of the date of the filing of this First Amended Complaint, Licensee has failed to comply with the IC's allegation letter and lawful Order to Produce Healthcare Records, which failure is impeding the IC's investigation of this matters.
- 329. On information and belief, Licensee's failure to comply with the IC's Order is knowing and willful.

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provided in NRS 630.352.

WHEREFORE, the Investigative Committee prays: That the Board give Respondent notice of the charges herein against her and give 4 him notice that she may file an answer to the Complaint herein as set forth in 5 NRS 630.339(2) within twenty (20) days of service of the Complaint; 6 That the Board set a time and place for a formal hearing after holding an Early 7 2. 8 Case Conference pursuant to NRS 630.339(3); That the Board determine what sanctions to impose if it determines there has been 9 3. 10 a violation or violations of the Medical Practice Act committed by Respondent; 11 4. That the Board award fees and costs for the investigation and prosecution of this case as outlined in NRS 622.400; 12 That the Board make, issue and serve on Respondent its findings of fact, 13 5. conclusions of law and order, in writing, that includes the sanctions imposed; and 14 That the Board take such other and further action as may be just and proper in these 15 6. premises. 16 DATED this 19 day of July, 2021. 17 18 INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS 19 20 By: AARON B. FRICKE, J.D. 21 General Counsel 22 9600 Gateway Drive Reno, NV 89521 23 Tel: (775) 688-2559 Email: africke@medboard.nv.gov 24 Attorney for the Investigative Committee 25 26 27 28

By reason of the foregoing, Respondent is subject to discipline by the Board as

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners 9600 Gateway Drive Reno, Nevada 89521

VERIFICATION

STATE OF NEVADA)
	: SS
COUNTY OF CLARK)

(775) 688-2559

Victor M. Muro, 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 Hay of July, 2021.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

VICTOR M. MURO, M.D.

Chairman for the Investigative Committee

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and

Complaint Against

TAMMY LYNN HANKINS, PA-C,

Respondent.

Case No. 21-51633-1

FILED

NOV 17 2021

NEVADA STATE BOARD OF MEDICAL EXAMINERS

FINDINGS AND RECOMMENDATIONS

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

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

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

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

¹ A Proof of Service for the Scheduling Order was filed subsequent to the evidentiary hearing on November 10, 2021, 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.

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

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

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

- 1. If a party fails to appear at a scheduled hearing and a continuance has not been scheduled or granted, any party who is present at the hearing may make an offer of proof that the absent party was given sufficient legal notice. Upon a determination by the regulatory body or hearing panel or officer that the absent party was given sufficient legal notice, the regulatory body or hearing panel or officer may proceed to consider and dispose of the case without the participation of the absent party.
- 2. If the licensee fails to appear at a hearing, the regulatory body or hearing panel or officer may accept the allegations against the licensee in the charging document as true.

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

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),

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

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

- 1. Respondent has prior felony convictions out of the State of Arizona for Conspiracy to Obtain a Dangerous Drug by Fraud, a Class B felony (conviction date is October 2, 2013), and Sexual Conduct with a Minor, a Class 6 felony (conviction date is August 11, 2014). Volume 2, Exhibits 17-19. Respondent was granted the privilege of probation for the Conspiracy to Obtain a Dangerous Drug by Fraud conviction, which was revoked based upon the violation of her probation and the subsequent Sexual Conduct with a Minor conviction. <u>Id.</u>
- 2. Subsequent to her incarceration for the Arizona felony convictions, perhaps in early October 2019, although it is not clear, Respondent began employment with Vida Spa LLC, a Nevada Limited Liability Company ("Vida Spa").
- 3. On March 6, 2020, Respondent appeared before the Board in support of her then submitted application to obtain licensure to practice as a physician's assistant in the State of Nevada. Respondent represented to the Board that her employment with Vida Spa was contingent upon her licensing and that she had not practiced clinical medicine since 2013. Volume II, Exhibit 20, pg. 318.
 - 4. Respondent was granted Nevada license on Mach 6, 2020.
- 5. On October 6, 2020, the Board received a complaint against Respondent regarding patient care and bodily injury in relation to a medical procedure that Respondent performed on June 27, 2020. Volume 1, Exhibit 19, p. 16; Volume II, Exhibit 30.
- 6. The IC investigated the lodged complaint and, in so doing, requested a response from Respondent to several allegations of wrongdoing. No response by Respondent was

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

- 7. Records obtained from Vida Spa in the course of the IC's investigation against Respondent demonstrate that Respondent had been practicing medicine at Vida Spa since at least October 2019, six (6) months prior to her appearance before the Board referenced in paragraph 3 above.
- 8. The records obtained in the course of the IC's investigation demonstrate that Respondent performed liposuction, a medical procedure, for Patient A on October 10, 2019; Patient B on October 8, 2019; Patient C on October 9, 2019; Patient D on October 13, 2019; Patient E on October 8, 2019; Patient I on June 2, 2020; Patient J on June 3, 2020; Patient K on June 4, 2020; and Patient L on June 5, 2020. In addition, Respondent performed medical procedures by undertaking Botox and Versa injections for Patient F on August 14, 2019; Xeomin and Versa injections for Patient G on October 29, 2019; and Versa injections for Patient H on November 5, 2019. Volume II, Exhibits 1 through 13, and 38-58; Volume II, Exhibit 19.
- 9. While undertaking each of the above-referenced medical procedures, Respondent was not working under a supervising physician. Volume I, Exhibit 19, pp. 36, 49-51, 53; Volume II, Exhibits 25, 26, and 30; *see* NRS 630.271.
- 10. The above-referenced medical procedures were performed in a facility that was not a medical facility nor otherwise permitted so as to legally accommodate the administration of anesthesia or sedation. Volume I, Exhibit 19, p. 73; see NRS 449.0151; NRS 630.373.
- 11. In undertaking the treatment of Patients A through E and I through L, Respondent, who was not a licensed prescribing practitioner in that she was not licensed at the time nor under the supervision of a prescribing physician (*see* NRS 453.126), prescribed controlled substances, namely Tramadol; Diazepam; Alprazolam; and/or Oxycodone. Volume II, Exhibits 1 through 5, 9 through 13; Volume II, Exhibit 19, pp. 51-54, 59-65, 68.
- 12. Respondent performed invasive medical procedures, namely liposuction and/or fat grafting on Patients A through E and I through L, without proper sedation and in a manner dangerous to patient care and safety, utilizing a tumescent anesthesia with Lidocaine and

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

WHEREFORE, the undersigned hearing officer finds as follows:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

RESPECTFULLY SUBMITTED this 16th day of November 2021.

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Patricia Halstead, Esq., Hearing Officer for the Nevada State Board of Medical Examiners 615 S. Arlington Ave. Reno, NV 89509 (775) 322-2244

phalstead@halsteadlawoffices.com

1	BEFORE THE BOARD OF MEDICAL EXAMINERS
2	OF THE STATE OF NEVADA
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6	In the Matter of Charges
7	and Complaint Against
8	Tammy Lynn Hankins, PA-C Case No. 21-51633-1
9	Respondent.
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12	HEARING
13	Tuesday, October 19, 2021
14	Reno, Nevada
15	Relio, Nevada
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23	Reported by: Lesley A. Clarkson, CCR #182
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25	Job No. 799273

EVIDENTIARY HEARING - 10/19/2021

1	A_P_P_E_A_R_A_N_C_E_S	Page 2
2		
3	FOR THE BOARD:	
4	NEVADA STATE BOARD OF MEDICAL EXAMINERS	
5	BY: AARON B. FRICKE, J.D., GENERAL COUNSEL	
6	9600 Gateway Drive	
7	Reno, Nevada 89521	
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9	HEARING OFFICER:	
10	PATRICIA HALSTEAD	
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Page 3 1 BE IT REMEMBERED that on Tuesday, October 19, 2021, 2 at the hour of 8:35 a.m. of said day, at the Nevada State Board 3 of Medical Examiners, 9600 Gateway Drive, Reno, Nevada, before 4 me, Lesley A. Clarkson, certified court reporter, the following 5 proceedings were had: -000-6 7 8 HEARING OFFICER: We are going to go ahead and go on 9 the record in the matter of charges and complaint against Tammy Lynn Hankins, PA-C. This is the time and date of the hearing on 10 11 this matter, of the evidentiary hearing, October 19, 2021. 12 hearing was to commence at 8:30 a.m. It is now 8:35. 13 I want to note for the record that I previously heard 14 the substance of this matter through a previous summary 15 suspension hearing that took place on September 20, 2021, and 16 order continuing summary suspension was filed on September 28, 17 2021. 18 With that, can you please state your appearance, Mr. Fricke. 19 20 Thank you. Aaron Fricke, general MR. FRICKE: Yes. 21 counsel for the Nevada State Board of Medical Examiners on behalf 22 of the investigative committee of the board. 23 HEARING OFFICER: And I don't think I called the case 24 number. The case number is 21-51633-1. And this is being 25 recorded today.

1	Page 4 Thank you, Mr. Fricke. Go ahead.
2	MR. FRICKE: Thank you. So as a preliminary matter,
3	I'd like to note for the record of our hearing today that at a
4	prior hearing on September 20 Exhibits 1 through 37, which are
5	physical exhibits that are contained in the binder that is before
6	you. We also have those exhibits available for the respondent if
7	she were to appear. I'd like to note for the record that I
8	believe she has not appeared. Is that correct? She's not in the
9	room?
10	HEARING OFFICER: That is correct, she is not here.
11	MR. FRICKE: And we have also admitted Exhibits 38
12	through 58, which are a series of videos that were downloaded
13	from social media of Vida Spa where the respondent was practicing
14	during the dates and times at issue in this, in the first amended
15	complaint.
16	With that, I believe I don't intend to put on any more
17	evidence. I have reviewed the, your order that emerged from the
18	summary suspension hearing and the transcript of that hearing.
19	And I believe with, and I also note for the record that the
20	record of the case, which is contained in the binder before you,
21	Miss Hall, contains 19 items, and evidences all of the proof of
22	service of Miss Hankins in this matter and all of that evidence.
23	So that's before you.
24	So I would like to close our record presentation of our
25	case and proceed to closing argument, which would be a very

EVIDENTIARY HEARING - 10/19/2021

1	abbreviated summation or recapitulation of the allegations. I
2	believe you are well aware of the record and you have very likely
3	all that you need to determine we have met our burden. And so
4	I'd like to probably proceed to that if that's okay.
5	HEARING OFFICER: Thank you. Let's start with putting
6	on the record Miss Hankins' notice of today's hearing and whether
7	or not that's been properly given.
8	MR. FRICKE: Thank you. So I would just start by
9	saying, noting some important dates. March 6, 2020, Miss Hankins
10	appeared before the board for initial licensure in the state.
11	She had no license before that date. If you look at Exhibit 20,
12	there are minutes of that meeting where it's self-evident what
13	Miss Hankins is trying to do, which is to get a license.
14	In June of 2021, this year, just four months ago, Miss
15	Hankins actually renewed her license to practice medicine in the
16	state. And during, and as part of that renewal, she made her
17	averment of her license pursuant to NRS 630.254, which requires
18	that every licensee maintain a permanent mailing address with the
19	board to which all communications to the board from the licensee
20	must be sent. Quoting from that statute.
21	Literally the next day after that license renewal was
22	issued, and based upon that averment or certification as to her
23	mailing address, the IC filed its formal complaint on June 25,
24	2021.
25	As the record reflects, that complaint and all other

1	Page 6 necessary filings and notices were sent to Miss Hankins' Lake
2	Havasu City, Arizona, address, which we believe is her residence
3	in Lake Havasu City. And on July 20, 2021, the IC filed its
4	first amended complaint and issued its order of summary
5	suspension, again serving both of those at the Lake Havasu City
6	address. All other required notices and orders have been served
7	on that address by certified mail.
8	So with that, I would offer that the record
9	demonstrates that Miss Hankins has been provided due and proper
10	notice of this hearing today and of all of the necessary
11	proceedings. And again I'd like to do what we did before, I'd
12	like to note for the record that she has failed to appear.
13	I believe we have made an offer of proof that she's
14	received sufficient legal notice, and I move that the board
15	accept the allegations in the complaint as true pursuant to NRS
16	622A.350, first that we can continue the hearing as Miss Hankins
17	received legal notice pursuant to sub 2 of that statute, that the
18	board may accept the allegations against Miss Hankins as true as
19	alleged in the charging document, which is the first amended
20	complaint.
21	HEARING OFFICER: So I will note that prior filings
22	have been sent certified. I do have the hearing date and have
23	been noted as delivered, and there's evidence in the record of
24	that.
25	I don't know if I got a proof of service for the order

Page 7

- 1 continuing summary suspension. Was that --
- 2 MR. FRICKE: And I apologize for that. We received
- 3 that about two weeks ago, and our legal assistant, Miss Fuentes,
- 4 broke her hand about a week and a half ago, and I'm not sure if
- 5 that has been sent yet.
- 6 HEARING OFFICER: So you don't know if it's been
- 7 certified mail to Miss Hankins yet?
- 8 MR. FRICKE: I believe it has been. I haven't seen,
- 9 that hasn't been placed in the record in front of you. But
- 10 that's just the order continuing the summary suspension. I'm
- 11 certain that it's been sent, at least I believe that it has been,
- 12 but it's not in the record at the moment.
- 13 HEARING OFFICER: Well, the only reason I ask is
- 14 because it's just another of many documents that state the
- 15 hearing date. So that's the only reason. But she obviously has
- 16 notice of the hearing as you have indicated, and I'll find that
- 17 she does. I'll note for the record that she is not here. I take
- 18 from your statement she has also not appeared in the Las Vegas
- 19 office nor had any contact with you about intending to appear
- 20 today. I have not had any contact with her, nor has a
- 21 continuation of this hearing been requested nor granted from me.
- Is there anything else before I move on to your
- 23 preliminary matter with the exhibits and the prior hearing being
- 24 considered for today's ruling?
- 25 MR. FRICKE: No. Thank you.

1	Page 8 HEARING OFFICER: So as you noted, NRS 622A.350,
2	section 2, provides if the licensee fails to appear at a hearing,
3	the regulatory body or hearing panel or officer may accept the
4	allegations against the licensee in the charging document as
5	true. The administrative code 630.470, section 2, also provides
6	if a licensee fails to appear at a scheduled hearing, no
7	continuance has been requested and granted, the evidence may be
8	heard, and the matter may be considered and disposed of on the
9	basis of evidence before the board panel or hearing officer in
10	the manner required by this section.
11	As Mr. Fricke had pointed out, there was a prior
12	suspension hearing where several exhibits were admitted and
13	evidence was presented to this hearing officer upon which a
14	summary suspension order was issued by which the suspension was
15	continued for purposes of today's hearing.
16	I will confirm that Exhibits 1 through 58 it was 58,
17	correct, Mr. Fricke?
18	MR. FRICKE: That's correct.
19	HEARING OFFICER: Will be considered for today's
20	purposes, as well as the transcript of that proceeding and all
21	testimony given. So in other words, to be clear, everything from
22	that hearing will be incorporated and referred with regard to
23	today's proceedings, a ruling will be issued in light of the
24	statute and what was priorly presented.
25	And you wanted to give a closing, Mr. Fricke?

1	Page 9 MR. FRICKE: Yes. Thank you. And I appreciate your
2	very orderly handling of this extraordinary matter, Miss Halstead
3	and keeping us straight and making sure our record is clear,
4	which is always what we are here to do.
5	This is a very unfortunate case. We are here to make a
6	record of certain violations of the medical practices act. NRS
7	630.346, sub 2, requires that finding of the board must be
8	supported by a preponderance of the evidence. The IC's
9	allegations in this case are not supported by a mere
10	preponderance of the evidence but by clear and convincing and
11	totally uncontroverted evidence.
12	Miss Friedman, senior investigator for the board, at
13	the summary suspension hearing gave lengthy, detailed, compelling
14	evidence to the extent that it's necessary to supplement the
15	already abundance of evidence that we have in documentary form,
16	as well as the video evidence, that establishes substantial proof
17	of the IC's allegations.
18	The IC's first amended complaint contains 53 counts in
19	all, and I submit to you all of those counts are established in
20	the record. I won't go through every, all 53, because I believe
21	that you can read the documents and the board can review those as
22	well, as well as watch the videos if it's necessary. But I will
23	summarize the presentation of those documents to you.
24	For example, if we look at Exhibit 1, which are medical
25	records for Patient A in this case, if we look at Exhibit 1, page

1	1, you will see an operative report authored and signed by Miss
2	Hankins and also signed later, as Miss Friedman testified, and as
3	Mr., I'm sorry, Dr. Borromeo acknowledged in his response to the
4	board's allegations, by Dr. Borromeo on page 2.
5	On page 3 you will see the prescription instructions,
6	again detailing point by point the prescription of narcotic for
7	the purposes of analgesia and anesthesia and sedation for an
8	invasive surgical procedure as described again on page 1, which
9	was a liposuction the arms of this patient. On page 3, the
10	bottom, that note again is signed by Miss Hankins.
11	Skipping forward to page 18, past the other medical
12	records of that patient, on page 18 you will see the PMP report
13	for this patient. Again the PMP gathered independently from the
14	information reported to it by a pharmacy that dispenses
15	medications. Here in this PMP on page, let's see, on page 24,
16	you will see those controlled substances, Diazapam and tramadol,
17	being dispensed by this Walgreens pharmacy.
18	On page 28 you will see dispensing records from the
19	custodian of records of the Walgreens. Again this comes from
20	records of Walgreens. On page 28 you will see those medications,
21	tramadol, Diazapam, promethazine, and a sulfa drug, which is
22	Bactrim antibiotic, being dispensed to this patient. Again on
23	page 39 of Exhibit 1 you will see the actual physical scrips that
24	were called in and recorded.
25	We have similar evidence for every single patient that

	_ 11
1	Page 11 details Miss Hankins' practicing medicine without a license,
2	perforce also without a supervising physician, committing
3	malpractice, committing conduct which is disreputable, and
4	fraudulently prescribing Schedule 4 controlled substances.
5	Those are Counts 1, 2, 3, and 4: Unlicensed practice,
6	1; malpractice, 2; fraudulent prescribing of controlled
7	substances; and disreputable conduct.
8	As Miss Friedman testified, we have even more patients
9	than the dozen or so patients that are, we have offered evidence
10	of.
11	Similarly I'd like to direct your attention to Count 21
12	and 22, which is illegal injection of Botox, and Count 22, with
13	respect to VERSA, which is another injectable which requires,
14	which by law needs to be done by a licensed practitioner.
15	If you look at Exhibit 6, page 146, you will actually
16	see a treatment record signed by Miss Hankins. Again note the
17	date, 10/24/19, October 24, 2019, for the patient noted as
18	Patient F in the patient designation. You also, if you turn to
19	page 142, you will see a billing printout for this patient that
20	was produced by Vida Spa showing the amounts charged to the
21	patient.
22	And then if you skip to page, I'm sorry, to Exhibit 20,
23	I'm sorry, not Exhibit 20, Exhibit 13. At Exhibit 13, page 272,
24	you see the daily procedure log which Miss Friedman testified to
25	receiving from Vida Spa. And though Vida Spa did not disclose we

1	Page 12 believe all the daily procedures Miss Hankins provided, this is
2	an independent account of the procedures at least since October
3	15, 2019. And you will see at the bottom of the page, two thirds
4	down, you will see on $10/24/2019$ Patient F, initials JR, the
5	billing and the fee charged, \$250 and \$499 respectively for the
6	Botox and the filler tear trough.
7	So moving on to Exhibit 20. You will see evidence of
8	Miss Hankins' fraudulent, fraud and misrepresentation in
9	obtaining a license. Miss Friedman testified as being present
10	via video conference at that meeting. She recalled details of
11	the discussion, but the minutes are enough. The minutes
12	establish that Miss Hankins knew very well she didn't have a
13	license to practice, that she oughtn't be practicing. Her
14	history is in Arizona, and her felony convictions placed her on
15	notice that she needed to be obviously licensed to practice. And
16	it's, the record demonstrates that Miss Hankins lied to the board
17	in an open meeting. And subsequently she received cease and
18	desist letters from pharmacy boards, Vida Spa's license was
19	suspended and eventually revoked. That's not in the record, but
20	subsequent to this meeting I'll offer it's a matter of public
21	notice that Vida Spa now ceased to exist as a going business.
22	And the other patient records demonstrate that, all
23	similar to the records of Patient A, that Miss Hankins
24	administered narcotics, opioids and benzodiazepines for the
25	administration of conscious sedation at Vida Spa, which is, as

1	Page 13 the record demonstrates, was a cosmetic facility, cosmetic
2	establishment, I'm sorry, not licensed by the bureau of health
3	care quality and compliance to a facility where you can offer
4	sedation or general anesthesia. She repeatedly performed
5	dangerous cosmetic surgeries, including liposuction of the
6	abdomen and arms, as well as fat grafting procedures. She did so
7	first without a license and then with a license but without a
8	supervising physician. I could go on and on with respect to the
9	individual counts.
10	Lastly, the reason for the IC's first amended complaint
11	was the addition of Counts 52 and 53, which are a continual
12	failure to practice medicine properly and a knowing and willful
13	failure to comply with an order of the investigative committee.
14	Proof of those counts, to the extent that it's necessary to have
15	additional proof, are found in the allegation letters and proof
16	of service that were sent to Miss Hankins. And those can be
17	found, getting ahead of myself, beginning at Exhibit 30, then
18	again 32, 33, 34, correspondence with the respondent at her email
19	address on file with the board; Exhibit 34, additional allegation
20	letters; 35 would be the subpoenas sent to Vida Spa; and on to
21	37.
22	So Miss Hankins impeded our investigation by failing to
23	meet her professional responsibilities to cooperate and respond
24	to the IC's order for her to respond. We proceeded, the IC
25	proceeded anyway as it could. Again as Miss Friedman testified,

Page 14

- 1 we were investigating very serious bodily harm allegedly done to
- 2 one of Miss Hankins' patients. And we had to rely on third
- 3 parties, including Dr. Borromeo and Dr. Washington, for evidence
- 4 to get records. We had to depend upon Vida Spa, which although
- 5 it's a business, Vida Spa, it's a medical practice, so we had to
- 6 issue subpoenas to them and to obtain records. This is highly
- 7 irregular, a highly irregular way to conduct a professional
- 8 practice, a highly irregular way to conduct oneself in the
- 9 practice of medicine.
- I would just close that it is one of the most egregious
- 11 cases, and I don't think it's necessary for me to embellish. The
- 12 record I think is replete with evidence that Miss Hankins ought
- 13 not to have a license. And although we will get to what
- 14 sanctions we would wish the board to impose, I would submit to
- 15 you, Miss Halstead, that our case is proven. And I'd, Miss
- 16 Hankins is not here.
- If you have any reservations, I would be happy to take
- 18 any questions you have.
- 19 HEARING OFFICER: Thank you. And I know you somewhat
- 20 have done this. I want you to continue just a little more
- 21 specifically so it will help me when I go to draft my order. The
- 22 first amended complaint filed July 20, 2021, is organized by
- 23 patient, correct, as far as the counts?
- 24 MR. FRICKE: Yes, largely it is. The counts are first
- 25 by patient, then there are counts -- I'm sorry. So that's

Page 15

- 1 basically pages 1 through 35. Then on page 36 there's
- 2 allegations with respect to fraud and misrepresentation in
- 3 obtaining a license. And then you will see another set of
- 4 patients, which is Patient I through Patient L, I believe. I
- 5 through L. And then those patients would be patients that Miss
- 6 Hankins treated after she received a license but before she
- 7 obtained and got a supervising physician.
- 8 HEARING OFFICER: So this is a problem I'm going to
- 9 have when I go through it, because I have to analyze each
- 10 individual count, right? And when we had this prior hearing, we
- 11 did an overall view, you know, we did, I don't know what those
- 12 terms are. When you are in an airplane and you look down and you
- 13 have this overall view, you know, should she have her license in
- 14 the meantime. But for this particular findings and
- 15 recommendations I'm going to have to go through each specific
- 16 count.
- So what I'm getting at is if I'm looking for things to
- do with Patient A and then I'm looking for things to do with
- 19 Patient B, I'm going to have to spend a lot of time going through
- 20 the exhibits trying to identify these patients and seeing where
- 21 that is substantiated, because that's not what we focused on in
- 22 the prior hearing.
- 23 So if you -- go ahead.
- 24 MR. FRICKE: If I may. The record, the exhibits are
- 25 organized, you know, 1 through 12 are Patient A through L.

1	Page 16 HEARING OFFICER: Thank you. You are going exactly
2	where I want you to go. Thank you.
3	MR. FRICKE: Thank you. And thank you for the
4	opportunity. So with respect to counts, I could start at the
5	beginning, with respect to Count 1 through 34, Counts 1 through
6	34 are Patient A through let's see. It's noted right there in
7	the count A through H, which would be Exhibits 1 through 8.
8	All of the records that are necessary. So we have the specific
9	patient records, and then you have obviously the supporting
10	evidence contained in the exhibits regarding when she was
11	licensed, et cetera, and so that shouldn't be difficult to find.
12	Then Exhibit 20 is the minutes of the meeting where she
13	obtained her license. And then you have Miss Friedman's
14	testimony on that, again the supporting documentation showing
15	that she received her license, as well as an attempt at locating
16	a supervising physician.
17	HEARING OFFICER: Which counts?
18	MR. FRICKE: So those would be with respect to the
19	fraud in obtaining a license, that would be Count
20	HEARING OFFICER: Count 35?
21	MR. FRICKE: 35. And then we commence again with
22	Patient I, as in India, and that would be Count 36 through 51,
23	which are Patients I through L. And those records are found in
24	Exhibits 9 through 12.
25	HEARING OFFICER: Thank you so much.

1	Page 17 MR. FRICKE: Again, the other records that we have all
2	sort of supplement and compliment the patient records, the actual
3	patient records of the actual treatment. Because again we have
4	at Exhibit 13, as we have already mentioned, the daily procedure
5	log which corroborates the patient records. We have Exhibit 20,
6	the public meeting where she retained her license. We have got a
7	public license, Exhibit 21, the public licensing information. We
8	have other communications that were sent to, from the pharmacy
9	board. We have the response, at Exhibit 24, Exhibits 2 and 26
10	and 27 responses from Drs. Washington and Borromeo. Exhibit 28,
11	we have additional detail information on Miss Hankins' licensure,
12	and Exhibit 29, the supervising agreement from Dr. Borromeo,
13	which gives you a time certain where Miss Hankins actually had a
14	supervising physician in all of these events, obviously with
15	regarding to her practicing without a supervising physician
16	occurred before that time. So we have a pretty clear timeline in
17	that respect.
18	Lastly, we have Counts 52 and 53. I would say that the
19	proof for Count 52 is found throughout the record. Miss Hankins
20	has demonstrated both in Arizona and in Nevada an inability to
21	practice medicine properly and safely, which would be a
22	continual, and a continual failure to do so.
23	And then the evidence for Count 53 is found
24	specifically in those communications from our investigators,
25	Exhibit 30, 31, 32, 33, and 34. And then 35, 36, 37 were the

1	Page 18 subpoenas that we had to send to Vida Spa to get the records that
2	Miss Hankins should have provided to us.
3	I think that's probably what you were looking for, I
4	hope.
5	HEARING OFFICER: It is. Thank you. I haven't started
6	writing yet, but this is going to help me tremendously.
7	MR. FRICKE: Wonderful. You know, we here at the
8	board, our investigators, and I know that the attorneys are
9	committed to first the patient safety, but also to the well-being
10	of our practitioners. I see my job as first and foremost being
11	to help physicians live happy, healthy lives while fulfilling
12	their professional responsibilities and trying to find that
13	balance. I believe Miss Hankins has demonstrated herself unable
14	to strike that balance, and she has placed patients in danger.
15	And as the evidence demonstrates, she's actually harmed patients
16	in the state by failing to do what the law requires.
17	And so with that, I would rest our case.
18	HEARING OFFICER: Then with that, I will take the
19	matter under advisement for the issuance of findings and
20	recommendations, which I have 60 days from today to do, and then
21	I will provide those to you. I know I have 60 days. This is
22	October, September, November, I think your next meeting is in
23	December, correct?
24	MR. FRICKE: Yes, it is.
25	HEARING OFFICER: So then it will be, the timing will

1	Page 19 work out well. I won't be too rushed.
2	MR. FRICKE: We usually close the lid on it a couple of
3	weeks in advance, but if it doesn't get done a couple of weeks in
4	advance, that's perfectly fine, we can put it on a later meeting.
5	HEARING OFFICER: Thank you so much. I appreciate your
6	time today.
7	MR. FRICKE: Thank you, Miss Halstead.
8	HEARING OFFICER: We will be off the record.
9	(9:15 a.m., proceedings concluded.)
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1	STATE OF NEVADA,)
2)
3	COUNTY OF WASHOE.)
4	
5	I, LESLEY A. CLARKSON, Certified Court Reporter for the
6	State of Nevada, do hereby certify:
7	That on Tuesday, October 19, 2021, I was present and
8	took stenotype notes of the proceedings entitled herein, and
9	thereafter transcribed the same into typewriting as herein
10	appears;
11	That the foregoing transcript is a full, true and
12	correct transcript of my stenotype notes of said proceedings.
13	Dated at Reno, Nevada, this 27th day of
14	October, 2021.
15	
16	Lesley A. Clarkson, CCR #182
17	
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19	
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1	Page 21 HEALTH INFORMATION PRIVACY & SECURITY: CAUTIONARY NOTICE
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24	disclosure - for compliance with Privacy Laws.
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EXHIBIT 1

EXHIBIT 1

Vida Spa 3225 S Rainbow Blvd, #107 Las Vegas, NV 89146 702-202-3050

OPERATIVE REPORT

PATIENT NAME:

, [

DOB

<u>DATE</u>: October 10, 2019

PREOPERATIVE DIAGNOSIS: Lipodystrophy ICD10 E88.1

POSTOPERATIVE DIAGNOSIS: Same

PROCEDURE: Liposuction, arms

SURGEON: Tammy Hankins, P.A.-C., Dr. Washington

ANESTHESIA: Lidocaine with I:100,000 epinephrine

TUMESCENT: 1000ML NS with 50cc Lidocaine 2% with epi 1:100,000

BLOOD LOSS: less than 50cc.

VOLUME REMOVED: 800cc total, 450cc adipose, 350cc serosanguinous fluid

This 57 year-old female demonstrates conditions described above of excess and redundant adipose tissue in large deposits of upper arms and lateral bra area and has requested surgical correction. The procedure, alternatives, risks and limitations in this individual case have been very carefully discussed with the patient. All questions have been thoroughly answered, and the patient understands the surgery indicated. She has requested this corrective repair be undertaken, and consent was signed.

The patient ambulated to the operative suite. While standing, the excess and redundant upper inner arm adipose tissue was carefully measured, and marked.

The patient was placed on the table in prone position. Bilateral upper arms, posterior peri-axillary areas were prepped, and the patient was draped in the usual sterile manner. 1% Lidocaine with 1:100,000 Epinephrine for anesthesia and vasoconstriction was injected into superficial dermis at incision sites. The surgical incision,4mm via #11 scalpel were symmetrical bilaterally: medial supra-axillary crease, and medial infra axillary, with no blood loss.

The abdomen was infused with 1L of tumescent fluid, 1000ML NS with 50cc Lidocaine 2% with epi 1:100,000, via 14G 30cannula.

1

After waiting a period of approximately twenty minutes for adequate vasoconstriction, the Vaser liposuction was started.

The previously outlined areas were re-identified and treated with Vaser high frequency ultrasound release via 3mm Vaser probe, and then standard cannula liposuction lipoplasty with the Vaser machine and instruments. A 3.7mm liposuction cannula was used. Approximately 400cc of serosanguinous adipose tissue was removed from each side. The patient tolerated the procedure well.

At the end of the operation the patient's wounds were reexamined for hemostasis, and no hematomas were noted. Patient remained stable, and alert and oriented x3 throughout procedure. The patient had nice contour and results appeared to be symmetrical. Sterile Gauze with antibiotic ointment were places over all incisions, and compression gauze over those bilaterally, with external compression garment placed to remain until follow up the next day.

The procedures were completed without complication and tolerated well with minimal blood loss. The patient was released ambulating to the company of her husband to return home in satisfactory condition. A follow-up appointment was scheduled for the next day, routine post-op medications prescribed, and post-op instructions given to the patient and other responsible party.

Tammy Hankins P.A.C. 10-

Vida Spa

PATIENT PRESCRIPTION INFO

	I ATILITI FILOURITO		
	DATE:	1	
whole 2 pills 2 pills 2 pills 1 pi	Pharmacy Info with Phone: Walayeens on Pacetrac 102-567-5454 15005Boulder Prescriptions: ICD10 E88. 157. Tramado 50 mg i-ip PO Q 60 pm p 12. Valium Day i PD Q 80 pm H 2. Valium Day i PD Q 60 pm pill4. Bactrim DS i PO BID XID L	Hender Huy + R 1-lipsdys 2 x 3 d. nausea, + + 20	Soon Wrack Hophy 1 x3d,
	Notes: And buy & Compression garmen Surg-Lipio 10/10 (a 3:00 Arms i axillae area 10/9/19 6:35pm done-Pharmacust Emply)	Surround	Arms

Vida Spa 102-202-3050 Shuman Washington DEA: BW1079 RISBME 0003



 $17da \Delta m^2$

3225 S. Rainbow Blvd, Ste 107 Las Vegas, NV 89146 www.vidaspalv.com

www.transformation

Patient Information

Patient Nam	e:_					
Address:_		Phone: ()			
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-	1					
Weight:k	g 42 lbs Height	.: BM	11Age: <u>57</u>	(DOB)(Gender: F
Allergies	-					147141E (4-1-1-1)
	AN					
Medication	Dose Fre	quency	Medication	Dose	• F	requency
						and the second dispersion of the property desire depend on the second of the second
Social History:	10 -			<u> </u>		
Occupation: 20	15 Employ	Marita	al Status: OSingle	Married (Divor	ced Owidowe
Tobacco Use:	No Yes (If ye	s, # of packs	/day# ye	ars)		
Caffeine Use: 🚫	No Yes (If ye	s, check all th	nat apply: Coffe	e Tea S	Soda)	
Alcoholic beverage	consumption: N	Yes (If	yes, how much an	d often		
Surgical History:	****		196 3			
☐ Appendectomy	Cholecystector	y Thyroid	iectomy THemor	rrhoidectomy	□Mam	mogram
☐ Hysterectomy	☐ Breast Surgery	☐Tubal litiga	ation Colonosco	ימי	LIVIGITI	inogram
☐ Hemia Repair	(location/type)			, py		
Other	, , , , , , , , , , , , , , , , , , , ,			Application of the state of the		
22		****				
Family Histor	y: Has anyone in your famil	y had any of the fo	ollowing conditions? (Che	ck if yes, and indicat	te relations	hip to you)
☐ Cancer/Polyps		☐ Anemia		High Blood Pressure	е.	
	Anal, Stomach, Breast,	☐ Diabetes	🗆	Anesthesia Reaction		1
i	, Ovaries, Thyroid, Lung,	1	- 1	Bleeding Problems_		
Blood, Lymphom		1	· · · · · · · · · · · · · · · · · · ·	Hepatitis		
Other	The state of the s	Stroke		Other		



Digestive: Nothing in this group	Neurological: Nothing in this group
☐ Loss of appetite	☐ Frequent headaches
☐ Difficulty swallowing	☐ Migraines
☐ Early satiety (fill up easy)	☐ Weakness
☐ Heartburn	☐ Seizures
☐ Nausea	☐ Stroke
☐ Vorniting	☐ Paralysis
☐ Diarrhea	☐ Decreased sensation
☐ Constipation	☐ Difficulty with speech
☐ Blood in stool	Dizziness
☐ Dark, tarry stools	
☐ Abdomlnal pain	Psychlatric: ☐ Nothing in this group
☐ Painful bowel movements	☐ Anxiety
☐ Poor control of BMs, urgency	☐ Depression
	☐ Mood swings
Urinary: Nothing in this group	☐ Phobias, fears
Burning with urination	☐ Panic attacks
☐ Weak urine stream	☐ Suicide thoughts or attempts
☐ Blood in urine	
☐ Gas or stool in urine	Endocrine: Nothing in this group
☐ Poor control, leakage of urine	☐ Heat or cold intolerance
☐ Kidney stones	☐ Excessive thirst
☐ Prostate problems	☐ Excessive urination
☐ Testicular mass	☐ Excessive Sweating
Get up at night to urinate - Number of times per night	
Gynecologic (female): Nothing in this group	Hematologic, Lymphatic: Nothing in this group
☐ Irregular periods - Last period:	☐ Prior blood transfusion
Abnormal vaginal discharge	☐ Easy bleeding or bruising
	Low red blood cell count (anemia)
Breast: Nothing in this group	Low white blood cell count
☐ Breast lump	Prolonged bleeding with cuts, surgery
☐ Breast pain	☐ Swollen glands
☐ Nipple discharge	☐ Blood clots
5 1 1	Use of blood thinners
Skin: Nothing in this group	☐ Swollen lymph nodes
Rash	
Skin Infections	Allergic, immunologic: Nothing in this group
☐ Ulcers or sores	☐ HIV infection
☐ Yellowing of the skin	☐ Hepatitis
☐ Eczema, psoriasis, other	☐ Imune deficiency
☐ Pyodemia gangrenosum, erythema nodosum	Antibiotics needed for dental work



BI. E.EDING PROBLEMS DO YOU BRUISE OR BLEED EASILY? YES (NO (WITH CUTS / TOOTH EXTRACT)	www.vidasj
, 🔾	CTIONS / PREGNANCY / SURGERY)
EVELAIN	
DO YOU HAVE A FAMILY HISTORY OF BLEEDING PROBLEMS? EXPLAIN NO 13	0
DIFFICULTIES WEEK LOCAL OR GENERAL ANESTHESIA	
ETPLAIN	
HAVE YOU EVER HAD AND LOOD TRANSFUSION? YES NO	
ARE YOU PRECNANT? YES NO	
HAVE YOU EVERHAD HAVE ORBEEN EXPOSED TO (PEFASE GIRCLE Y	COPNO
YIII (NO INTRAVENOUS DRUGS YES	NO HEPATITIS
YES NO INFECTIOUS DISEASES YES	NO HIV / AIDS
YES TO ANY EXPLAIN	NO LIVER TRANSPLANT
*	parameter and the same parameter at the same and an advanced and advanced as a same and
Review of Systems: Dayou surrette beautiful	
Review of Systems: Do you currently have any of the follow General: Nothing in this group	ving symptoms or conditions (Check if yes)
☐ Weight loss – How muchlbs	Cardiovascular: Nothing in this group
Loss of Appetite	Chest pain
Fever	Palpitations
Chills	Heart valve problems
☐ Night Sweats	☐ Calf pain with walking
☐ Fainting Spells	Leg swelling
C ranting Spens	
Eyes: Nothing in this group	Respiratory: Nothing in this group
☐ Eye disease or injury	☐ Chronic cough
☐ Wear glasses or contacts	Coughing up blood
☐ Blurred or double vision	☐ Short of breath with activity
	Short of breath lying flat
Esr, Nose, Mouth, Throat: Nothing in this group	☐ Wheezing
Hearing loss	Asthma
Ear ache / infection	☐ Bronchitis
☐ Ringing in ears	☐ Pneumonia
☐ Nose Bleeds	Moranda ta La CETAL NA
☐ Bleeding gums	Musculoskeletal: Nothing in this group
☐ Mouth sores	☐ Joint pain
☐ Sore throat	rthritis
Recent voice change	☐ Back pain
Runny nose / cold	Muscle weakness
☐ Sinus problems	Leg pain with walking
☐ Neck stiffness / pain	Leg pain at rest
☐ Enlarged neck glands / masses	☐ Broken bones



Patient Profile .							
Name:			Date:	10-10-1	9		
Address:			City:	11 1			
State: Zip:			Home P	hone:			
Work Phone:			Cell Pho	one;			
Age: <u>57</u> DOF	3: 5		Preferre	d Contact#			
Occupation: Sel	- Emt	oloy	Employ	er:			
SSN:			Driver's	License: _			
Email:		W 12					
Medical Questionnaire	2	(D)					
Madiaally		(Please	circle yes or no)				
Medical History Diabetes	Yes	(NI)	High Cl	a a la atawa l	Van	(Fin	
High Blood Pressure	Yes	450	_	nolesterol	Yes	(40)	
Heart Attack	Yes	(1)		ry Heart Disease	Yes	NO.	
Heart Disease	Yes	(IIVO	Stroke/	l Artery	Yes	A S	
Multiple Sclerosis		ATA			Yes	(NO	
-	Yes	170		on's disease	Yes	(140)	
Epilepsy Hepatitis	Yes Yes	(1/O	Liver D		Yes	(NO ATA)	
Bowel Problems				Disease (BBII)	Yes	(NO	
Prostate Cancer	Yes	0013		Disease (BPH)	Yes	(INO)	
Sexually Transmitted	Yes Yes	(IVO	-	e's Disease	Yes	(NO)	
Blood Transfusion	Yes	(40)		fection/AIDS	Yes	CIVO	
Tuberculosis	· Yes	(IVO)		Depression	Yes	NO AB	
Other	. 162		Bleedin	g Disorder	Yes	N >	5
Current medications (pills, inject	ions, laxat	ives, sedatives, vita	amins, others)			
Surgery							
Heart Yes	(No)		Blocked Artery	Yes	(No)		
Prostate Yes	No		Penis	Yes	(V)		
Bowel Yes	(1/9		Bladder	Yes	No		
Hemia Yes	No		Vasectomy	Yes	(M)		
Scrotum/Test Yes	No		Spine	Yes	No		
Other							
Previous Urology Pro	11		Domis	V	(T-)		
Kidneys Yes Bladder Yes			Penis Testicles	Yes Yes			
Bladder Yes Prostate Yes			Testicles Urine	Yes	(12/9)		
11031410 165	(1)		Offic	1 03			
Injuries	V				\sim		
Head Yes	(No)		Back	Yes	(Nd		



Johan Spill

3225 S. Rainbow Biyd, Ste 107 Las Vegas, NV 89146 www.vidaspalv.com

Pelvis S	(es	(No)	Penis		Yes No)
History of Recreat Alcohol? (1 Smoking? (1 Recreational Drug)	19) 10)	Yes F Yes H	ow Much?	No Yes. H	ow Often?	
Family History Diabetes Cancer of the Prost	ate	Yes N		ature Heart Attack Blood Pressure	Yes (No	
Social History: Marital Status: S Physical Activity:	Single	Married		eparated Widow	ed	
Allergies Have you ever had	an a lle				No	
If yes, please provi	de det	ails:				~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~
Please provide you	<u>r сипе</u>	nt physician Name	S:	Phone	Specialty	Last Visit
Family Physician						
Specia list						
Specia list		<u> </u>				
General Surger	y PA	TIENT HIS	TORY FOR	RM Name:		
DOB:	<i>'</i>	Age: C	Date: _ hief Compl	aint:	Referrir	ig Doctor:
Wt:	Medi	ication Alle	rgies:			Ht:
			 		 Me	dication Dose Frequency
Marital Status: \$	Single s	quency So Married I) Cat	ocial History Divorced W feine Use:	y: Occupation:_ 'idowed Tobacco No Yes (If yes, o	o Use: No \	es (If yes, # of packs/day at apply: Coffee Tea Soda
						sease Diabetes Stroke



Tiller Sy.

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Anxiety Depression Asthma GERD Cancer Other:	
	Surgica
History: Appendectomy Cholecystectomy Thyroidectomy Hemorrhoidectomy Mamm Hysterectomy Breast Surgery Tubal litigation Colonoscopy Hernia Repair (location/ty	
Other:	
Family History: Please describe any additional problem/concerns which you	ou think the
Physician should be made aware of:	
Diabetes Heart Disease HTN Cancer Other Mother Father Sister Brother	
Grandfather Grandmother Aunt Uncle	



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VASER LIPO INFORMED CONSENT FORM

This is an informed-consent document that has been prepared to help educate you on the VASER Lipo procedure. its risks, and alternative treatment.

It is important that you read this information carefully and completely. Please initial each page, indicating that you have read the page, and sign the Consent for Surgery as proposed by your surgeon.

VASER Lipo is a surgical technique to remove unwanted deposits of fat from specific areas of the body, including the face and neck, upper arms, upper and lower back, abdomen, buttocks, hips, inner and outer thighs, knees, calves, and ankles. This is not a substitute for weight reduction, but a method for removing localized deposits of fatty tissue. VASER Lipo may be performed as a primary procedure for body contouring or may be combined with other surgical techniques.

The best candidates for VASER Lipo are individuals of relatively normal weight who have excess fat in particular body areas. Having firm, elastic skin will result in a better final contour after lipoplasty. Skin that has diminished tone due to stretch marks, weight loss, or natural aging will not reshape itself to the new contours and may require additional surgical techniques to remove and tighten excess skin. Body-contour irregularities due to structures other than fat cannot be improved by this technique. Lipoplasty itself will not improve areas of dimpled skin known as "cellulite".

The VASER Lipo procedure is performed utilizing advanced proprietary technology. A patented grooved solid metal probe is first inserted through one or more small skin incisions. Ultrasonic energy emitted from the sides and end of the probe as it is passed back and forth breaks down fatty deposits. A hollow metal surgical instrument known as a cannula is then inserted and is directed through the area of emulsified fat cells. The cannula is attached to a vacuum source, which provides gentle suction to remove the emulsified fat. Because the VASER Lipo procedure is unique in that it first targets and dissolves fat cells and then draws out emulsified fat, leaving the collagen matrix intact, surgical trauma, complications and the potential for post-operative pain and bruising are minimized while skin retraction is optimal.

VASER Lipo may be performed under local or general anesthesia and requires the infiltration of fluid containing dilute local anesthetic and epinephrine into areas of fatty deposits. This technique can reduce discomfort at the time of surgery, as well as reduce post-operative bruising.

Support garments and dressings are worn after surgery to control potential swelling and promote healing, to provide comfort and support, and to help skin better fit new body contours. Your surgeon may recommend that you make arrangements to donate a unit of your own blood that would be used if a blood transfusion were necessary after surgery.

ALTERNATIVE TREATMENT

Alternative forms of management include not treating the areas of fatty deposits, and diet and exercise regimens that may be of benefit in the overall reduction of excess body fat. Direct removal of excess skin and fatty tissue may be necessary in addition to lipoplasty in some patients. Risks and potential complications are associated with alternative forms of treatment that involve surgery.

Patient	Initials:	
1 allCIII	minuais.	



RISKS AND SIDE EFFECTS

Every surgical procedure involves a certain amount of risk, and it is important that you understand the risks involved with the VASER Lipo procedure. An individual's choice to undergo a surgical procedure is based on the comparison of the risk to potential benefit. Although the majority of patients do not experience these complications, you should discuss each of them with your surgeon to make sure you understand the risks, potential complications, and consequences of VASER Lipo.

Patient Selection: Individuals with poor skin tone, medical problems, or unrealistic expectations may not be candidates for VASER Lipo.

Allergic Reactions: Rarely, local allergies to tape, suture material, or topical preparations utilized in hipoplasty procedures have been reported. More serious systemic reactions due to drugs administered during surgery and prescription medicines may require additional treatment.

Asymmetry: Due to factors such as skin tone, bony prominence, and muscle tone, which can contribute to normal asymmetry in body features, it may not be possible to achieve symmetrical body appearance through lipoplasty procedures.

Bleeding: While unusual, it is possible to have a bleeding episode during or after surgery. Should post-operative bleeding occur, it may require emergency treatment to drain accumulated blood or require a blood transfusion. Non-prescription herbs and dietary supplements can increase the risk of surgical bleeding. Do not take any aspirin or anti-inflammatory medications for 2 weeks before surgery, as this may increase the risk of bleeding. Please review our Medication Alert for products and ingredients to be avoided for 2 weeks prior to and 2 weeks following your scheduled VASER Lipo procedure. and consult your doctor before taking anything.

Change in Skin and Skin Sensation: A temporary decrease in skin sensation may occur following VASER Lipo. This usually resolves over a period of time. Diminished or complete loss of skin sensation that does not totally resolve could potentially occur, as it infrequently has with various lipoplasty procedures.

Chronic Pain: Chronic pain and discomfort following VASER Lipo is unusual, but possible.

Infection: Infection is uncommon following this type of surgery. Should an infection occur, treatment with antibiotics or additional surgery may be necessary. Although extremely rare, life-threatening infections such as toxic shock syndrome could occur after lipoplasty surgery, regardless of the technology utilized.

Pulmonary and Systemic Complications: In extremely rare cases, fat droplets could become trapped in the lungs to create a possibly fatal complication called fat embolism syndrome. Pulmonary complications may occur secondarily to blood clots (pulmonary emboli) or partial collapse of the lungs after general anesthesia. Should either of these complications occur, you may require hospitalization and additional treatment. In some circumstances, pulmonary emboli can be life-threatening or fatal.

Long-term Effects: Subsequent alterations in body contour may occur as a result of aging, weight loss or gain, pregnancy, or other circumstances not related to VASER Lipo.

Patient	Initials:	



Scarring: Although the incisions created for VASER Lipo are minimal and good wound healing after a surgical procedure is expected, abnormal scars may occur within the skin and deeper tissues in rare cases. Such scars may be unattractive and of a different color than the surrounding skin. Additional treatments, including surgery, may be necessary to treat abnormal scarring.

Seroma: While VASER Lipo has reduced the incidence and severity of seromas associated with lipoplasty procedures, such fluid accumulation is possible and could require additional treatments or surgery to promote drainage.

Bruising and/or Swelling: Although VASER Lipo typically reduces or eliminates bruising and swelling normally resulting from lipoplasty procedures, bruising and swelling may occur and, in rare situations, persist for extended periods of time.

Skin Contour Irregularities: Since VASER Lipo selectively targets fat cells, leaving other essential tissues intact, skin contour irregularities and depressions in the skin are unlikely but possible. Visible and palpable wrinkling of skin can occur, particularly when large quantities of fat cells are removed and/or the skin is lacking good elasticity. Post-operative skin contour irregularities could necessitate additional treatments including surgery.

Skin Loss: Additional treatments including surgery could be necessary in the unlikely event that skin loss occurs following your VASER Lipo treatment.

Surgical Anesthesia: All forms of surgical anesthesia or sedation, whether administered locally or generally, carry risks including the possibility of complications, injury, and even death. You will probably be required to sign a separate anesthesia consent form in preparation for your surgery.

Surgical Shock: VASER Lipo could conceivably cause severe trauma, particularly when multiple or extensive areas are treated in a single session. Although serious complications are a rarity, infections or excessive fluid loss can lead to severe illness and even death. Should surgical shock occur following your VASER Lipo treatment, hospitalization and additional treatment would be necessary. Individuals undergoing VASER Lipo procedures to remove large volumes of fat are at a greater risk of complications. Patients contemplating large-volume lipoplasty (greater than 5000 cc removed) may be advised to undergo post-operative monitoring and aftercare that involves overnight hospitalization.

Lidocaine Toxicity: There is the possibility that large volumes of fluid containing dilute local anesthetic drugs and epinephrine that is injected into fatty deposits during surgery may contribute to fluid overload or systemic reaction to these medications. Additional treatment including hospitalization may be necessary.

Ultrasonic Technology: Risks associated with the use of ultrasound in lipoplasty treatments include the aforementioned and the following specific risks:

Burns: Ultrasonic energy may produce burns and tissue damage if the probe touches the undersurface of the skin for prolonged periods of time. If burns occur, additional treatment and surgery may be necessary.

als:	Initials:	Patient
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Probe Fragmentation: Ultrasonic energy produced within the probe(s) may cause disintegration (fragmentation) of the surgical instrument. The occurrence and effect of this is unpredictable. If this should occur, additional treatment including surgery may be necessary.

Unknown Risks: The long term effect on tissue and organs of exposure to short-duration, high-intensity ultrasonic energy is unknown. The possibility exists that additional risk factors resulting from the use of ultrasound in VASER Lipo could potentially be discovered.

Other: While we have attempted to assist you in building realistic expectations for your VASER Lipo treatment, you may be disappointed with your surgical results. However infrequent, it may be necessary in your case to perform additional surgery to improve results.

ADDITIONAL SURGERY NECESSARY

There are many variable conditions in addition to risk and potential surgical complications that may influence the long term result of VASER Lipo. Even though risks and complications are unusual, the risks cited previously are particularly associated with lipoplasty procedures utilizing suction and/or ultrasound technologies. Other complications and risks can occur but are even more uncommon. If complications should occur, additional surgery or other treatments may be necessary. The practice of medicine is not an exact science. Although good results are expected, there is no guarantee or warranty expressed or implied on the results that may be obtained.

FINANCIAL RESPONSIBILITIES

The cost of surgery involves several charges for the services provided. The total includes fees charged by your doctor, the cost of surgical supplies, anesthesia, laboratory tests, and possible outpatient hospital Charges, depending upon where the surgery is performed. Due to the proprietary nature and expense of the technology utilized, your bill may reflect a separate and additional fee for the use of VASER equipment specific to your procedure. Based upon whether the cost of surgery is covered by an insurance plan, you will be responsible for necessary copayments, deductibles, and charges not covered. As an elective, cosmetic procedure, VASER Lipo is not typically covered by insurance, placing full responsibility for payment upon the patient. You may incur additional costs should complications develop from the surgery. Secondary surgery or hospital day-surgery charges incurred due to remedial surgery are also the responsibility of the patient.

|--|



DISCLAIMER

Informed-consent documents are used to communicate information about the proposed surgical treatment of a disease or condition along with disclosure of risks and alternative forms of treatment(s). The informed consent process attempts to define principles of risk disclosure that should generally meet the needs of most patients in most circumstances.

However, informed consent documents should not be considered all inclusive in defining other methods of care and risks encountered. Your surgeon may provide you with additional or different information that is based on all the facts in your particular case and the state of medical knowledge.

Informed-consent documents are not intended to define or serve as the standard of medical care. Standards of medical care are determined on the basis of all of the facts involved in an individual case and are subject to change as scientific knowledge and technology advance and as practice patterns evolve. It is important that you read the above information carefully and have all of your questions answered before signing the the next page.

Patient Initials: FB



I have received and read the information: VASER® Lipo Informed Consent

I understand that VASER Lipo is an elective surgery procedure to remove body fat from specific area(s) of the body.

The procedure has been explained to me in a way that I understand. I have had the opportunity to ask questions, and my questions have been answered. Alternative methods of treatment have been discussed with me.

I acknowledge that no guarantee has been given by anyone as to the results that I may obtain. Although a good result is expected, I understand that there are risks to the procedure or treatment proposed, as detailed in the preceding information pages.

consent to the administration of such anesthetics considered necessary or advisable. I understand that all forms of anesthesia involve risk and the possibility of complications, injury, and sometimes death.

For purposes of advancing medical education, I consent to the admittance of observers to the operating room.

I consent to the disposal of any tissue, medical devices or body parts which may be removed.

authorize the release of my Social Security number to appropriate agencies for legal reporting and medical device registration, if applicable.

Having discussed the reasonable expectations of the VASER Lipo procedure with me and answered all of my questions to my satisfaction, I hereby authorize and such assistants as may be selected to perform VASER Lipo and any other procedure(s) that in their judgment may be necessary or advisable should unforeseen circumstances arise during surgery.

With my signature below I hereby consent to having VASER Lipo and to the above.

Please rewrite in your own handwriting: "I understand that the practice of medicine is not an exact science and although good results are expected, there can be no guarantee as to the results."

Patient Signature Date Date	Patient Signature				10-10-17
-----------------------------	-------------------	--	--	--	----------



NSBME 0016

I certify that I, and/or a member of Vida Spa staff, have discussed all of the above with the patient and answered all questions regarding the VASER Lipo procedure. I believe the patient fully understands and all questions have been answered.

Clinician Signature 35.4	Date 10-10-89
I am a smoker of tobacco: I understand that tobacco smoking increases health risks. Doct not possible, to drastically reduce the amount of my smoking, a weeks after my surgery.	
It has been explained to me that there is decreased circulation so this can cause a delay in wound healing as well as skin breakdo	
As a smoker, I understand that the surgery will have to be more these complications, which may still occur, despite the doctor's	- -
This has been fully explained to me and I relieve Vida Spa frosmoking habits.	om any responsibility related to the increased risks from my
Patient Signature	Date
I am a non-smoker of tobacco:	
Patient Signature \mathcal{G}	-
I do not use social drugs.	
Patient Signature 4	-
Patient name (please print):	_
DOB:	
Requested By:	
7	

Patient Initials: FB



1. the above-named patient, hereby consent that photographs, videotape, and/or computer imaging may be taken of me or of parts of my body under the following conditions:

Pre- and post-operative photographs will be taken of my treatment for record purposes. The photographs will be taken by my physician or a photographer approved by my physician. I understand that these photographs will be the property of the attending physician and Vida Spa.

I understand that all computer imaging viewed is only a representation of the result that could be achieved through this procedure and that imaging is used as an educational tool to benefit the patient without guarantee of any result.

I have had the opportunity to discuss this consent with my surgeon and agree that all of my questions have been answered. This authorization is granted in furtherance of medical education and other good and valuable consideration and as a voluntary contribution. I hereby waive all rights I might have to photographs, videotape, and computer images and do hereby release, discharge, and save harmless Vida Spa and their employees and agents from all claims and liabilities whatsoever in law and in equity arising from such use.

I have read and fully understand and consent to all the above items contained in this form.

Patient Signature	05	Date	10-10-	19



Report Prepared: 12/28/2020

Patient History Results

Report Criteria

			Patier	Patient History			
Patient I ast Name	Patient First Name	Patient DOB	Requestor Last Name	Requestor First Name	User Role	Date 🔻	Requestor Source
			Friedman	Kim	Licensing Board Investigator	12/28/2020 11:24 AM	AWARXE
			Mansy	Medhat	Pharmacist	12/15/2020 02:13 PM	AWARXE
			Washington	Sherman	Physician (MD, DO)	11/16/2020 12:46 PM	AWARxE
			Friedman	Kim	Licensing Board Investigator	10/27/2020 12:57 PM	AWARXE
			McClish	Dena	Admin	10/27/2020 10:51 AM	AWARXE

Disclaimer:

investigator. I understand and agree that by proceeding beyond this page and accessing this Prescription Monitoring Program (PMP) system, I certify that I am active healthcare

I understand that my use of this PMP system is permitted only in connection with obtaining information for an open investigation, and certify that I am accessing the PMP system for such a purpose.

I understand that my access to, or disclosure of, any PMP data for any purpose other than obtaining information for an open investigation may subject me to disciplinary action, civil penalties or criminal action. I understand that the information in the PMP system is confidential pursuant to NRS 453.1545. I must treat the information as confidential, just as I would protect any other health care information. I will protect any PMP information in my possession in accordance with federal and state laws governing health care information.

I understand that I am responsible for all use of my username and password. I will never share my password with anyone, including my co-workers and staff. If my authentication or password is lost or comprised, I agree to notify the PMP immediately.

Date Range: 12/28/2019 - 12/28/2020

Search Criteria		Name	Linked Records	Demographic	DOB: Sex:	
		DOB			F Report Prepared:	
	>	ĪD			12/28/2020	
	Ŧì	Gender				
		Address				
					Date Range:	
	Search Criteria		DOB ID Gender	DOB ID Gender Address	DOB ID Gender Address	Sex: F Report Prepared: 12/28/2020 ad Records DOB ID Gender Ch Criteria

Risk Indicators

NARXCARE SCORES

OVERDOSE RISK SCORE

Narcotic Sedative Stimulant 030 030 000

(Range 000-999)

or the prescriber. NarxCare scores and reports are intended to aid, not replace, medical decision making. None of the information presented should be used as sole justification for providing or refusing to provide medications. The information on this report is not warranted as accurate or complete. This NarxCare report is based on search criteria supplied and the data entered by the dispensing pharmacy. For more information about any prescription, please contact the dispensing pharmacy

ADDITIONAL RISK INDICATORS (0)

INFORMATION GRAPH

Prescribers 1 - Sherman Washingto

12/28

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14

2y

overdose risk in the same dose-dependent manner as doses for full agonist opioids. MME = morphine milligram equivalents. LME = Lorazepam milligram equivalents. MG = dose in milligrams. thresholds meant for opioids prescribed for pain. Buprenorphine products have no agreed upon morphine equivalency, and as partial opioid agonists, are not expected to be associated with *Per CDC guidance, the MME conversion factors prescribed or provided as part of the medication-assisted treatment for opioid use disorder should not be used to benchmark against dosage

Timeline	320 200 80 0 Timeline	Timeline Morphine MgEq (MME)	Buprenorphine mg 28 16
1228	12/28	1228 E)	
2m	2m	2m	
6	67	6m	
44	14	Ą	
-	-		
VZ	29	24	

DOE	
įψ	1

Current mg/day.	0.00	Current mg/day:	0.00	Current MME/day:	3	Total Prescribers:
	0	Current Qty:	0	Current Qty:	2	Total Prescriptions:
Buprenorpnine)	Sedatives	ວuprenorphine)	Narcotics * (excluding buprenorphine)		Summary

Prescriptions

10/09/2019	10/09/2019	Fill Date
_	7	₽
10/09/2019	10/09/2019 10/09/2019	ID Written
10/09/2019	10/09/2019	Sold
Tramadol Hcl 50 Mg Tablet	9 Diazepam 10 Mg Tablet	Drug
24.00 3	8.00	Qty
ω	ω	Days
Sh Was	8.00 3 Sh Was	Qty Days Prescriber Rx#
2512648	2512649	Rx#
Wal (8809) 0/0	2512649 Wal (8809) 0/0 2.67 LME	Pharmacy
0/0	0/0	Refill
40.00 MME	2.67 LME	Daily Dose * Pymt Type PMP
Comm Ins	Comm Ins NV	Pymt Type
Z	Z	PMP

Prescribers

Pharmacies

Walgreen Co. (8809) 1500 S Boulder Hwy Henderson NV 89015-8506	Zipcode
	Zipcode
(702) 567-5454	

Disclaimer

Report contents are based on data entered by dispensers and their staff, and may contain errors. The Board of Pharmacy recommends independent verification with dispensers when prudent or necessary. Willful disclosure of prescription information may be subject to disciplinary action, civil penalties or criminal action.

Page 1 of

10

CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

DATE PRINTED: 12/18/2020

INSURANCE PROFILE

12/15/2018 through 12/15/2020

Patient Phone:
Date of Birth:

Gender: F

Allergy Conditions: None on file
None on file

Date of Birt	h:	Gender: F								-	ieaith	Non	e on tile		
Rx-Store	Medication	Instructions	Drug Mfr	NDC	Class	Days Supply	Entered Date	Fili Qty	Fill Nbr	RPH	Pbr Name	DEA#	Pbr Phone	Plan	Cust Amt
2375509-5369	PREMARIN 1.25MG TABLETS	TAKE 1 TABLET BY MOUTH DAILY AS DIRECTED	PFIZER	00046- 1104-81		30	01/24/2019	30		MMT	OLIVER, JAMES	BO4621721	(702)877- 5199	HPN	0.00
2375509-5369	PREMARIN 1.25MG TABLETS	TAKE 1 TABLET BY MOUTH DAILY AS DIRECTED	PFIZER	00046- 1104-81		30	02/23/2019	30		SHK	OLIVER, JAMES	BO4621721	(702)877- 5199	HPN	0.00
2375509-5369	PREMARIN 1.25MG TABLETS	TAKE 1 TABLET BY MOUTH DAILY AS DIRECTED	PFIZER	00046- 1104-81		30	03/30/2019	30		EAM	OLIVER, JAMES	BO4621721	(702)877- 5199	HPN	0.00
2375509-5369	PREMARIN 1.25MG TABLETS	TAKE 1 TABLET BY MOUTH DAILY AS DIRECTED	PFIZER	00046- 1104-81		30	12/23/2018	30		EAM	OLIVER, JAMES	BO4621721	(702)877- 5199	HPN	0.00
										T	otal	4 Subto	otal:	120	\$ 0.00
2438774-5369	PREMARIN VAGINAL CREAM 30GM	INSERT 0.5 GRAM VAGINALLY DAILY(3 WEEKS ON AND 1 WEEK OFF)	PFIZER	00046- 0872-21		30	03/30/2019	30		EAM	OLIVER, JAMES	BO4621721	(702)877- 5199	HPN	0.00
2438774-5369	PREMARIN VAGINAL CREAM 30GM	INSERT 0.5 GRAM VAGINALLY DAILY(3 WEEKS ON AND 1 WEEK OFF)	PFIZER	00046- 0872-21		30	04/29/2019	30		MMT	OLIVER, JAMES	BO4621721	(702)877- 5199	HPN	0.00

*****THIS REPORT CONTAINS PATIENT HEALTH INFORMATION WHICH IS LEGALLY PROTECTED UNDER HIPAA LEGISLATION*****
THIS INFORMATION MUST BE USED AND STORED IN ACCORDANCE WITH HIPAA POLICIES

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Page 2 of 10

CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

DATE PRINTED: 12/18/2020

INSURANCE PROFILE

12/15/2018 through 12/15/2020

Patient Phone:

DIRECTED

Allergy Conditions: None on file Health None on file

Date of Birth: Gender: F Rx-Store Medication Instructions Drug Mfr NDC Class Days Entered Fill FIII RPH Pbr Name DEA# Pbr Phone Plan **Cust Amt** Qty Supply Date Nbr Total Subtotal: 60 \$ 0.00 ADMINISTER 0.5ML IN 2438921-5369 BOOSTRIX INJ, GLAXO 58160-RX 1 03/30/2019 0 EAM HAROUNI, BH6731283 (800)573-0.00 0.5ML THE MUSCLE AS SMITH 0842-11 RAMA 3597 DIRECTED KLINE Total Subtotal: 0 \$ 0.00 2450011-5369 PREMARIN TAKE 1 TABLET BY PÉIZER 00046-RX 30 04/29/2019 30 OLIVER, BO4621721 (702)877-HPN 0.00 1.25MG TABLETS MOUTH DAILY AS 1104-81 **JAMES** DIRECTED 2450011-5369 PREMARIN TAKE 1 TABLET BY **PFIZER** 00046-RX 30 05/25/2019 30 OLIVER, BO4621721 (702)877-0.00 1.25MG TABLETS MOUTH DAILY AS 1104-81 **JAMES** 5199 DIRECTED 2450011-5369 PREMARIN TAKE 1 TABLET BY PEIZER 00046-RX 30 06/23/2019 30 MMT OLIVER, BO4621721 (702)877-0.00 1.25MG TABLETS MOUTH DAILY AS 1104-81 **JAMES** 5199 DIRECTED 2450011-5369 PREMARIN TAKE 1 TABLET BY PEIZER 00046-RX 30 07/23/2019 30 EAM OLIVER BO4621721 (702)877-0.00 1.25MG TABLETS MOUTH DAILY AS 1104-81 JAMES 5199 DIRECTED 2450011-5369 PREMARIN TAKE 1 TABLET BY **PFIZER** 00046-RX 30 08/22/2019 30 MMT OLIVER, JAMES BO4621721 (702)877-HPN 0.00 1.25MG TABLETS MOUTH DAILY AS 1104-81

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> > > CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

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CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

DATE PRINTED: 12/18/2020

INSURANCE PROFILE

12/15/2018 through 12/15/2020

Allergy Conditions: None on file

Patient Phone: Health None on file Date of Birth: Gender: F Rx-Store Medication Instructions Drug Mfr NDC Class Days Entered Fill Fill RPH Pbr Name DEA# Pbr Phone Plan **Cust Amt** Supply Date Qty Nbr 2450011-5369 PREMARIN TAKE 1 TABLET BY MOUTH DAILY AS PFIZER 00046-30 09/21/2019 30 EAM OLIVER, BO4621721 (702)877-HPN 0.00 1.25MG TABLETS 1104-81 **JAMES** 5199 DIRECTED Total 6 Subtotal: 180 \$ 0.00 2495828-5369 ESTRADIOL 0.01% INSERT 1/4 VAG CREAM APPLICATO ALVOGEN 47781-RX 30 01/08/2020 42 MMT OLIVER. BO4621721 (702)877-HPN 0.00 APPLICATORFUL 0104-44 JAMES 5199 42.5GM VAGINALLY AT BEDTIME 2495828-5369 ESTRADIOL 0.01% INSERT 1/4 ALVOGEN 47781-RX 30 08/29/2019 42 OLIVER, BO4621721 (702)877-0.00 VAG CREAM 42.5GM APPLICATORFUL 0104-44 **JAMES** 5199 VAGINALLY AT BEDTIME 2495828-5369 ESTRADIOL 0.01% INSERT 1/4 ALVOGEN 47781-RX 30 OLIVER. 10/01/2019 42 MMT BO4621721 (702)877-5199 HPN 0.00 APPLICATORFUL VAG CREAM 0104-44 VAGINALLY AT BEDTIME 2495828-5369 ESTRADIOL 0.01% INSERT 1/4
VAG CREAM APPLICATORFUL ALVOGEN 47781-0104-44 30 10/30/2019 OLIVER, BO4621721 (702)877-HPN 0.00 JAMES 5199 VAGINALLY AT 42.5GM BEDTIME 2495828-5369 ESTRADIOL 0.01% INSERT 1/4 ALVOGEN 47781-MMT OLIVER, JAMES RX 30 12/12/2019 42 BO4621721 (702)877-HPN 0.00 VAG CREAM 42.5GM APPLICATORFUL VAGINALLY AT 0104-44 5199

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CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

INSURANCE PROFILE

12/15/2018 through 12/15/2020

DATE PRINTED: 12/18/2020

Patient Pho Date of Birt		Gender: F									Allergy Conditi Health		None on file None on file		
Rx-Store	Medication	Instructions	Drug Mfr	NDC	Class	Days Supply		Fili Qty	Fill Nbr	RPH	Pbr Name	DEA#	Pbr Phor	ne Plan	Cust Amt
		BEDTIME													
										1	Total	5 S	ubtotal:	210	\$ 0.00
2512648-5369	TRAMADOL 50MG TABLETS	TAKE 1 TO 2 TABLETS BY MOUTH EVERY 6 HOURS AS NEEDED FOR PAIN	AMNEAL	65162- 0627-11	C4	3	10/09/2019	24		EAM	WASHINGTON SHERMAN	, BW107	9032 (702)982- 6800	HPN	0.00
										-	Total	1 S	ubtotal:	24	\$ 0.00
2512649-5369	DIAZEPAM 10MG TABLETS	TAKE 1 TABLET BY MOUTH EVERY 8 HOURS AS NEEDED	IVAX	00172- 3927-60		3	10/09/2019	8		EAM	WASHINGTON SHERMAN	, BW107	9032 (702)982- 6800	HPN	0.00
										-	Total	1 S	ubtotal:	8	\$ 0.00
2512650-5369	PROMETHAZINE 25MG TABLETS	TAKE 1 TABLET BY MOUTH EVERY 6 HOURS AS NEEDED FOR NAUSEA	KVK TECH	10702- 0003-50	RX	3	10/09/2019	12		EAM	WASHINGTON SHERMAN	, BW107	79032 (702)982- 6800	CASH	11.99
										3	Total	1 S	ubtotal:	12	\$ 11.99

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CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

DATE PRINTED: 12/18/2020

INSURANCE PROFILE

12/15/2018 through 12/15/2020

Allergy Conditions: None on file

Patient Pho	one:										lealth				
Date of Bir	th:	Gender: F								Г	1691(1)	NON	e on file		
Rx-Store	Medication	Instructions	Drug Mfr	NDC	Class	Days Supply	Entered Date	FIII Qty	Fill Nbr	RPH	Pbr Name	DEA#	Pbr Phone	Plan	Cust Amt
2512651-5369	SULFAMETH/TRIM ETHOPRIM 800/160MG TB	TAKE 1 TABLET BY MOUTH TWICE DAILY FOR 10 DAYS	AUROBINDO	065862- 0420-05	RX	10	10/09/2019	20		EAM	WASHINGTON SHERMAN	, BW1079032	(702)982- 6800	HPN	0.00
										To	otal	1 Subto	tal:	20	\$ 0.00
2519747-5369	PREMARIN 1.25MG TABLETS	TAKE 1 TABLET BY MOUTH DAILY AS DIRECTED	PFIZER	00046- 1104-81	RX	30	02/07/2020	30		EAM	OLIVER, JAMES	BO4621721	(702)877- 5199	HPN	0.00
2519747-5369	PREMARIN 1.25MG TABLETS	TAKE 1 TABLET BY MOUTH DAILY AS DIRECTED	PFIZER	00046- 1104-81	RX	30	03/06/2020	30		MMT	OLIVER, JAMES	BO4621721	(702)877- 5199	HPN	0.00
2519747-5369	PREMARIN 1.25MG TABLETS	TAKE 1 TABLET BY MOUTH DAILY AS DIRECTED	PFIZER	00046- 1104-81		30	03/29/2020	30		EAM	OLIVER, JAMES	BO4621721	(702)877- 5199	HPN	0.00
2519747-5369	PREMARIN 1.25MG TABLETS	TAKE 1 TABLET BY MOUTH DAILY AS DIRECTED	PFIZER	00046- 1104-81		30	04/27/2020	30		NTW	OLIVER, JAMES	BO4621721	(702)877- 5199	HPN	0.00
2519747-5369	PREMARIN 1.25MG TABLETS	TAKE 1 TABLET BY MOUTH DAILY AS DIRECTED	PFIZER	00046- 1104-81		30	10/28/2019	30		IRT	OLIVER, JAMES	BO4621721	(702)877- 5199	HPN	0.00
2519747-5369	PREMARIN 1.25MG TABLETS	TAKE 1 TABLET BY MOUTH DAILY AS DIRECTED	PFIZER	00046- 1104-81		30	12/12/2019	30		MMT	OLIVER, JAMES	BO4621721	(702)877- 5199	HPN	0.00

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CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

INSURANCE PROFILE

12/15/2018 through 12/15/2020

Patient Phone:

DATE PRINTED: 12/18/2020

Allergy Conditions: None on file
Health None on file

Date of Birt	th:	Gender: F										,,,,			
Rx-Store	Medication	Instructions	Drug Mfr	NDC	Class	Days Supply	Entered Date	Fili Qty	Fill Nbr	RPH	Pbr Name	DEA#	Pbr Pho	ne Plan	Cust Amt
										Ŧ	otal	6 Sub	total:	180	\$ 0.00
2525633-5369	OMEPRAZOLE 20MG CAPSULES	TAKE 1 CAPSULE BY MOUTH DAILY	AUROBIND	O59651- 0002-05		30	01/06/2020	30		MMT	BELNAP, LOGAN	MB462909	94 (702)677- 3720	HPN	0.00
2525633-5369	OMEPRAZOLE 20MG CAPSULES	TAKE 1 CAPSULE BY MOUTH DAILY	AUROBIND	O59651- 0002-05		30	02/03/2020	30		MMT	BELNAP, LOGAN	MB462909	94 (702)877- 3720	HPN	0.00
2525633-5369	OMEPRAZOLE 20MG CAPSULES	TAKE 1 CAPSULE BY MOUTH DAILY	AUROBIND	O59651- 0002-05		30	03/04/2020	30		MMT	BELNAP, LOGAN	MB462909	94 (702)677- 3720	HPN	0.00
2525633-5369	OMEPRAZOLE 20MG CAPSULES	TAKE 1 CAPSULE BY MOUTH DAILY	AUROBIND	O59651- 0002-05		30	11/11/2019	30		MMT	BELNAP, LOGAN	MB46290	94 (702)677- 3720	HPN	0.00
2525633-5369	OMEPRAZOLE 20MG CAPSULES	TAKE 1 CAPSULE BY MOUTH DAILY	AUROBIND	O59651- 0002-05		30	12/11/2019	30		MMT	BELNAP, LOGAN	MB46290	94 (702)677- 3720	HPN	0.00
										Ī	otal	5 Sub	total:	150	\$ 0.00
2550998-5369	PREMARIN 1.25MG TABLETS	TAKE 1 TABLET BY MOUTH DAILY AS DIRECTED	PFIZER	00046- 1104-81		30	01/12/2020	30		SHK	OLIVER, JAMES	BO46217	21 (702)877- 5199	HPN	0.00
										Ŧ	otal	1 Sub	total:	30	\$ 0.00
2561018-5369	ESTRADIOL 0.01% VAG CREAM 42.5GM	INSERT 1/4 APPLICATORFUL VAGINALLY AT	TEVA	00093- 3541-43		30	02/04/2020	42		ммт	OLIVER, JAMES	BO46217	21 (702)B77- 5199	HPN	0.00

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CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

10

DATE PRINTED: 12/18/2020

INSURANCE PROFILE

12/15/2018 through 12/15/2020

Patient Phone:

Allergy Conditions: None on file

None on file

Health Date of Birth Gender: F Rx-Store Medication Instructions Drug Mfr NDC Class Days Fill Entered Fill RPH Pbr Name DEA# Pbr Phone Plan **Cust Amt** Supply Date Qty Nbr Total Subtotal: 42 \$ 0.00 2574310-5369 ESTRADIOL 0.01% INSERT 1/4 MYLAN 00378-RX 30 03/05/2020 42 MMT OLIVER. BO4621721 (702)877-HPN 0.00 VAG CREAM APPLICATORFUL 8770-35 JAMES 5199 VAGINALLY AT BEDTIME Total Subtotal: 42 \$ 0.00 2586912-5369 OMEPRAZOLE TAKE 1 CAPSULE BY **APOTEX** 60505-RX 30 04/03/2020 30 BELNAP, MB4629094 (702)677-0.00 20MG CAPSULES MOUTH DAILY 0065-01 LOGAN 3720 2586912-5369 OMEPRAZOLE TAKE 1 CAPSULE BY **APOTEX** 60505-RX 30 04/27/2020 30 NTW BELNAP. MB4629094 (702)677-3720 HPN 0.00 20MG CAPSULES MOUTH DAILY 0065-01 LOGAN TAKE 1 CAPSULE BY MOUTH DAILY 2586912-5369 OMEPRAZOLE APOTEX 60505-RX 30 05/25/2020 30 BELNAP, EAM MB4629094 (702)677-0.00 20MG CAPSULES 0065-01 LOGAN 3720 2586912-5369 OMEPRAZOLE TAKE 1 CAPSULE BY 60505-APOTEX RX MB4629094 (702)677-3720 30 06/24/2020 30 EAM BEI NAP HPN 0.00 20MG CAPSULES MOUTH DAILY 0065-01 LOGAN OMEPRAZOLE 2586912-5369 TAKE 1 CAPSULE BY 60505-07/28/2020 **APOTEX** RX 30 30 BELNAP, MB4629094 (702)677-EAM HPN 0.00 20MG CAPSULES MOUTH DAILY 0065-01 LOGAN 3720 TAKE 1 CAPSULE BY OMEPRAZOLE 2586912-5369 **APOTEX** 60505-RX 30 08/26/2020 30 EAM BELNAP MB4629094 (702)677-HPN 0.00 20MG CAPSULES MOUTH DAILY 0065-01 LOGAN 3720 2586912-5369 OMEPRAZOLE TAKE 1 CAPSULE BY APOTEX 60505-RX BELNAP. 30 09/23/2020 30 MB4629094 (702)677-HPN EAM 0.00 20MG CAPSULES MOUTH DAILY 0065-01

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CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

DATE PRINTED: 12/18/2020

INSURANCE PROFILE

12/15/2018 through 12/15/2020

Patient Phone:

Allergy Conditions: None on file

Date of Birt	th:	Gender: F								ŀ	tealth	Non	e on file		
Rx-Store	Medication	Instructions	Drug Mfr	NDC	Class	Days Supply	Entered Date	Fill Qty	Fill Nbr	RPH	Pbr Name	DEA#	Pbr Phoi	ne Plan	Cust Amt
2586912-5369	OMEPRAZOLE 20MG CAPSULES	TAKE 1 CAPSULE BY MOUTH DAILY	APOTEX	60505- 0065-01	RX	30	10/22/2020	30		RKW	BELNAP, LOGAN	MB4629094	(702)677- 3720	HPN	0.00
										T	otal	8 Subto	tal:	240	\$ 0.00
2587248-5369	ESTRADIOL 0.01% VAG CREAM 42.5GM	INSERT 1/4 APPLICATORFUL VAGINALLY AT BEDTIME	ALVOGEN	47781- 0104-44		30	04/03/2020	42		ммт	OLIVER, JAMES	BO4621721	(702)877- 5199	HPN	0.00
2587248-5369	ESTRADIOL 0.01% VAG CREAM 42.5GM	INSERT 1/4 APPLICATORFUL VAGINALLY AT BEDTIME	ALVOGEN	47781- 0104-44		30	06/02/2020	42		EAM	OLIVER, JAMES	BO4621721	(702)877- 5199	HPN	0.00
2587248-5369	ESTRADIOL 0.01% VAG CREAM 42.5GM	INSERT 1/4 APPLICATORFUL VAGINALLY AT BEDTIME	ALVOGEN	47781- 0104-44		30	06/30/2020	42		MMT	OLIVER, JAMES	BO4621721	(702)877- 5199	HPN	0.00
										Ŧ	otal	3 Subto	otal:	126	\$ 0.00
2608934-5369	PREMARIN 1.25MG TABLETS	TAKE 1 TABLET BY MOUTH DAILY AS DIRECTED	PFIZER	00046- 1104-81	RX	30	06/02/2020	30		EAM	OLIVER, JAMES	BO4621721	(702)877- 5199	HPN	0.00
2608934-5369	PREMARIN 1.25MG TABLETS	TAKE 1 TABLET BY MOUTH DAILY AS DIRECTED	PFIZER	00046- 1104-81		30	06/26/2020	30		MMT	OLIVER, JAMES	BO4621721	(702)877- 5199	HPN	0.00

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0.00

\$ 0.00

CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

Allergy Conditions: None on file

BELNAP,

LOGAN Total

DATE PRINTED: 12/18/2020

INSURANCE PROFILE

12/15/2018 through 12/15/2020

Patient Phone:

2680491-5369 OMEPRAZOLE

OMEPRAZOLE TAKE 1 CAPSULE BY 20MG CAPSULES MOUTH DAILY

KREMERS

62175-

0118-43

Health None on file Date of Birth: Gender: F Rx-Store Medication Instructions Drug Mfr NDC Class Days Entered Fill FIII RPH Pbr Name DEA# Pbr Phone Plan **Cust Amt** Supply Date Qty Nbr 2608934-5369 PREMARIN TAKE 1 TABLET BY MOUTH DAILY AS PFIZER 00046-RX 07/26/2020 30 OLIVER, BO4621721 (702)877-HPN 0.00 1.25MG TABLETS 1104-81 **JAMES** DIRECTED TAKE 1 TABLET BY MOUTH DAILY AS 2608934-5369 PREMARIN **PFIZER** 00046-RX 30 08/25/2020 30 OLIVER, BO4621721 (702)877-EAM HPN 0.00 1.25MG TABLETS 1104-81 **JAMES** 5199 DIRECTED 2608934-5369 PREMARIN TAKE 1 TABLET BY MOUTH DAILY AS **PFIZER** 00046-RX 30 09/25/2020 MMT OLIVER, BO4621721 (702)877-HPN 0.00 1.25MG TABLETS 1104-81 **JAMES** 5199 DIRECTED TAKE 1 TABLET BY MOUTH DAILY AS 2608934-5369 PREMARIN PFIZER 00046-RX 30 10/28/2020 OLIVER, EAM BO4621721 (702)877-HPN 0.00 1,25MG TABLETS 1104-81 **JAMES** 5199 DIRECTED Total 6 Subtotal: \$ 0.00 180 2669171-5369 FLUZONE PES ADMINISTER 0.5ML IN THE MUSCLE AS SANOFI 49281-RX 10/23/2020 HAROUNI, BH6731283 (800)573-HPN 0.00 2020-21 INJ 0.5ML PASTEUR 0420-50 RAMA 3597 DIRECTED Total 0 \$ 0.00 1 Subtotal:

11/17/2020

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CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

HPN

30

MB4629094 (702)677-

1 Subtotal:

Page 1

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CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

DATE PRINTED: 12/18/2020

12/15/2018 through 12/15/2020

INSURANCE PROFILE

Allergy Conditions: None on file Patient Phone: Health None on file Date of Birth: Gender: F Rx-Store Medication Instructions Drug Mfr NDC Class Days Entered Fill Fill RPH Pbr Name DEA# Pbr Phone Plan **Cust Amt** Qty Supply Date Nbr 2682804-5369 PREMARIN TAKE 1 TABLET BY PFIZER 00046-RX 30 11/23/2020 30 OLIVER, BO4621721 (702)877-0.00 1.25MG TABLETS MOUTH DAILY AS 1104-81 **JAMES** 5199 DIRECTED Total 1 Subtotal: 30 \$ 0.00 Total Scripts: 56 Total Price: \$ 11.99 Using generics you saved a total of: \$ 0.00 Using more generics you could have saved a total \$ 0.00 Your insurance saved you a total of: \$ 10,340.65 Your cash quantity discount saved you a total \$ 0.00 Page 10 10 of

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NV WALGREENS PURGED DATA FOR STORE 05369

PAGE: 182520

REPORT: RX0920 08/14/20
PAT LAST NAME FIRST

PAT ADDRESS

PAT PHONE# BIRTH DATE

RX NUMBER DRUG NAME DRUG NAME DOC ADDRESS DRUG MFR CTL PLAN RX IMAGE IDCO NAME DOC ADDRESS DOC NAME OF REFILLS DAYS SUPPLY RX COMMENTS

ENTER DATE CIND ENT/VER FILL QTY REFILL CUST AMT TOT AMT FILL SOLD DATE CLAIM # AUTH NBR AUTH BY

CTL PLAN RX IMAGE ID DOC PHONE# DEA#

PARTIAL CODE PLAN

REPORT: RX0920	08/14/20	NV WALGREENS PURGED DATA FOR STORE 05369	PAGE: 182521
PAT LAST NAME	FIRST	PAT ADDRESS	PAT PHONE# BIRTH DATE

RX NUMBER DRUG NAME DOC ADDRESS
ORIG DATE QTY REFILLS DAYS SUPPLY RX COMMENTS
ENTER DATE CIND ENT/VER FILL QTY REFILL CUST AMT TOT AMT FILL SOLD DATE CLAIM # PARTIAL CODE PLAN AUTH NBR AUTH BY

RX 2364343 PREMARIN VAGINAL CREAM 30GM PFIZER RX HPII 0536992153808009710
OLIVER, J 1397 GALLERIA DR HENDERSON, NV 89002-8350 (702)877-5199 B04621721
SIG: J 10.5 GRAW VAGINALLY D (2 WEEKS ON AND 1 WEEK OFF)
XFER TO STORE: 5369 RX#: 2438774 RPH INIT: MMT ENT INIT: YYY 03/30/2019 XFER FROM STORE DEA: BW6678809 RPH INIT: MMT 09/27/2018 30 5 30
12/23/2018 YYY/EAM 30 RFL003 0.00 369.35 12/28/2016 183571298128078999 HPII 01/24/2019 YYY/SHK 30 RFL004 0.00 387.77 01/27/2019 190241249549053999 HPII 02/23/2019 YYY/SHK 30 RFL005 0.00 387.77 03/03/2019 190541276777051999 HPII 02/23/2019 YYY/SHK 30 RFL005 0.00 387.77 03/03/2019 190541276777051999 HPII

REPORT: RX0920 11/06/20
PAT LAST NAME FIRST NV WALGREENS PURGED DATA FOR STORE 05369 PAGE: 171551 PAT ADDRESS PAT PHONE# BIRTH DATE

RX NUMBER DRUG NAME DRUG MFR CTL PLAN RX IMAGE

DOC NAME DOC ADDRESS DOC PHONE#

ORIG DATE OTY REFILLS DAYS SUPPLY RX COMMENTS

ENTER DATE CIND ENT/VER FILL OTY REFILL CUST AMT TOT AMT FILL SOLD DATE CLAIM #

AUTH NBR AUTH BY CTL PLAN RX IMAGE ID DOC PHONE#

PARTIAL CODE PLAN

RX 2351111 FLUTICASONE 50MCG NASAL SP (120) RX WEST-WARD MARAYONK, P 270 W LAKE MEAD PKWY HENDERSON, NV 89002-8350 SIG: SHAKE LQ AND U 1 SPR IEN BID 08/24/2018 16 5 30 0536911153512348714 (702)677-3720 MM3163932

12/23/2018 YYY/EAM 16 RFL003 0.00 5.18 12/28/2018 183571295126089999 HPN

REPORT: RX0920 11/06/20 NV WALGREENS PURGED DATA FOR STORE 05369 PAGE: 171552 PAT LAST NAME FIRST PAT ADDRESS PAT PHONE# BIRTH DATE

RX NUMBER DRUG NAME CTL PLAN RX IMAGE ID DOC PHONE# DRUG MFR RX NOMBER DRUG NAME DOC ADDRESS

ORIG DATE QTY REFILLS DAYS SUPPLY RX COMMENTS

ENTER DATE CIND ENT/VER FILL QTY REFILL CUST AMT TOT AMT FILL SOLD DATE CLAIM # PARTIAL CODE PLAN AUTH NBR AUTH BY AUTH NBR AUTH BY REFILL CUST AMT TOT AMT FILL SOLD DATE CLAIM # PARTIAL CODE

01/24/2019 YYY/SHK 16 RFL004 0.00 5.18 01/27/2019 190241250121028999 HPN
02/23/2019 YYY/SHK 16 RFL005 0.00 5.18 03/03/2019 190541277217075999 HPN
RX 2477022 ESTRADIOL 0.01% VAG CREAM 42.5GM ALVOGEN
COLIVER, J 1397 GALLERIA DR HENDERSON, NV 89002-8350
SIG: INSERT 0.25 VAGINALLY OHS
07/09/2019 42.500 11 30
07/09/2019 42.500 11 30
CLIVER, J 1397 GALLERIA DR HENDERSON, NV 89002-8350
SIG: I 1/4 APL VAGINALLY
SIG: I 1/4 APL VAGINALLY HS
XFER TO STORE: 5369 RX#: 2478026 RPH INIT: EAM ENT INIT: EAM 07/11/2019 XXX/EAM 0
07/11/2019 42.500 11 0
07/11/2019 XXX/EAM 0



Rx #: 2512648-1 Store #: 5369 Sold Date: 10/09/2019

Prescription Image Side 1

POWER PCC STORE#	
NamePhone ()AddressAllergies/Health Info	Date: Lofely Initials:
Phone (201 - 30 50	DEA BW1078032
Address	Caller ID (1947)
Drug: Joshs del Joy	Drug: Discept 1ep
Directions: -2 telopo e6 hm E881 831M	Directions: The 18hm pr
QTY: W Refills: W DAW: Y N	QTY: Refills: DAW: Y N WIC# 225610

Prescription Image Side 2



Rx #: 2512649-3

Store #: 5369

Sold Date: 10/09/2019

Prescription Image Side 1

POWER PCC STORE#			
Name	Phone ()_		Date: Lefely Initials:
Phone (N) 203 Name 1550 Address	7050	DEA BD / NPI Caller ID (P L	078032
Drug: SISMSd Directions: -2 +eby	el 309 20 66 hrs 8811 \$3 DS	Drug: DSS2 Directions:	epr 1ep hrs pr C-88:1
QTY: 74 Refills: 65	DAW: Y N	QTY: Refilis:	DAW: Y N WIC# 225610

Prescription Image Side 2



Rx #: 2512650-2

Store #: 5369

Sold Date: 10/09/2019

Prescription Image Side 1

POWER PCC STORE# Name _ DOB _ Address _ Allergies/Health (nfo _	Phone ()		Date: 10fefy nitials:
Allergies/Health Info Phone 704 20 L	3020	DEA BU/	
Name DSCHO		NPI	
Address		Caller ID TS N	ng
Drug: Press	ire	Drug: Bsch	~M
Directions:	ery	Directions:	1
5 polo Li	nes	1 00 pm	in
QTY: /2 Refills:	DAW: Y N	QTY: 20 Refills: 2	DAW: Y N
			WIC# 225610

Prescription Image Side 2



Rx #: 2512651-1

Store #: 5369

Sold Date: 10/09/2019

Prescription Image Side 1

POWER PCC STORE# Name DOB Address Allergies/Health (nfo	Phone ()		Date: 10felg Initials:
Allergies/Health (nfo	3050	DEA BL	107/032
Name DS(h)	1m, shea	DEA 13 D	101405
Address	,	Caller ID 7	ms
Drug: Jove MS	il	Drug: BSCA	n-M
Directions: TholoLu Nru	not nes	Directions:	in
QTY: /2 Refills:	DAW: Y N	QTY: 20 Refills:	DAW: Y N WIC# 225610

Prescription Image Side 2

EXHIBIT 2

EXHIBIT 2

Vida Spa 3225 S Rainbow Blvd, #107 Las Vegas, NV 89146 702-202-3050

OPERATIVE REPORT

PATIENT NAME:

DOB

DATE: October 8, 2019

PREOPERATIVE DIAGNOSIS: Lipodystrophy ICD10 E88.1

POSTOPERATIVE DIAGNOSIS: Same

PROCEDURE: Liposuction, arms

SURGEON: Tammy Hankins, P.A.-C. Dr Washington

ANESTHESIA: Lidocaine with 1:100,000 epinephrine

TUMESCENT: 1000ML NS with 50cc Lidocaine 2% with epi 1:100,000

BLOOD LOSS: less than 50cc.

VOLUME REMOVED: 1200cc total, 1000cc adipose, 200cc serosanguinous fluid

This 31year-old female demonstrates conditions described above of excess and redundant adipose tissue in large deposits of upper arms and lateral bra area and has requested surgical correction. The procedure, alternatives, risks and limitations in this individual case have been very carefully discussed with the patient. All questions have been thoroughly answered, and the patient understands the surgery indicated. She has requested this corrective repair be undertaken, and consent was signed.

The patient ambulated to the operative suite. While standing, the excess and redundant upper inner arm adipose tissue was carefully measured, and marked. The patient was placed on the table in supine position. Bilateral upper arms, posterior peri-axillary areas were prepped with betadine solution paint, and the patient was draped in the usual sterile manner. 1% Lidocaine with 1:100,000 Epinephrine for anesthesia and vasoconstriction was injected into superficial dermis at incision sites. The surgical incision,4mm via #11 scalpel were symmetrical bilaterally: medial elbow, medial supra-axillary crease, and medial infra axillary, with no blood loss. The abdomen was infused with 1L of tumescent fluid, 1000ML NS with 50cc Lidocaine 2% with epi 1:100,000, via 14G 30cannula.

1

After waiting a period of approximately twenty minutes for adequate vasoconstriction, the Vaser liposuction was started.

The previously outlined areas were re-identified and treated with Vaser high frequency ultrasound release via 3mm Vaser probe, and then standard cannula liposuction lipoplasty with the Vaser machine and instruments. A 3.7mm liposuction cannula was used. Approximately 600cc of serosanguinous adipose tissue was removed from each side. The patient tolerated the procedure well.

At the end of the operation the patient's wounds were reexamined for hemostasis, and no hematomas were noted. Patient remained stable, and alert and oriented x3 throughout procedure. The patient had nice contour and results appeared to be symmetrical. Sterile Gauze with antibiotic ointment were places over all incisions, and compression gauze over those bilaterally, with external compression garment placed to remain until follow up the next day.

The procedures were completed without complication and tolerated well with minimal blood loss. The patient was released ambulating to the company of her husband to return home in satisfactory condition. A follow-up appointment was scheduled for the next day, routine post-op medications prescribed, and post-op instructions given to the patient and other responsible party.

Tammy Hankins P.A.-C

10-8-19



Vida No. 3225 S. Rainbow Blvd, Ste 107 Las Vegas, NV 89146 www.vidaspalv.com

www.lransformation

Patient Information

Patient Name:			
Address	Phone: Emergency Contact:		
Weight: kg 190 lbs Height	5'4 BMIAge:3	<u>3_(DOB_</u>	Gender: Femal
Allergies Medication:	Reaction:		_
Medication:	Reaction;		
Medication:	Reaction:	5	_
Medication Dose Fred	quency Medicatio	n Dose	Frequency
Social History:)		
Occupation: Office Clevin	Marital Status: Osi	ngle Married On	vorced ()Widowad
Tobacco Use: (V) No (V) Yes (If yes	s, # of packs/day#	years)	
Caffeine Use: No (X) Yes (If yes	s, check all that apply: Co	offee L Tea L Soda	1)
Alcoholic beverage consumption: No	Yes (If yes, how much	and often I DUNN	weom)
Surgical History:			
☐ Appendectomy ☐ Cholecystectom	y Thyroidectomy He	morrhoidectomy	ammooram
☐ Hysterectomy ☐ Breast Surgery	☐Tubal litigation ☐Colono	scopy	
☐ Hernia Repair (Iocation/type)			
Other:			
Family History: Has anyone in your family		Check if yes, and indicate relat	cionship to you)
Cancer/Polyps_	Anemia	High Blood Pressure	NOW
Colon, Rectum, Anal, Stomach, Breast,	☐ Diabetes	Anesthesia Reaction	
Prostate, Uterus, Ovaries, Thyroid, Lung,	☐ Blood Clots	Bleeding Problems	,
Blood, Lymphoma Other	☐ Heart Disease	☐ Hepatitis	ı
		Other	



Fida Son 3225 S. Rainbow Blyd, Ste 107 Las Vegas, NV 89146 www.vidaspalv.com

Digestive: Nothing in this group	Neurological: Nothing in this group
Loss of appetite	☐ Frequent headaches
☐ Difficulty swallowing	☐ Migraines
☐ Early satiety (fill up easy)	☐ Weakness
☐ Heartburn	☐ Seizures
☐ Nausea	☐ Stroke
☐ Vomiting	☐ Paralysis
☐ Diarrhea	☐ Decreased sensation
☐ Constipation	☐ Difficulty with speech
☐ Blood in stool	☐ Dizziness
☐ Dark, tarry stools	
☐ Abdominal pain	Psychlatric: 🙀 Nothing in this group
Painful bowel movements	☐ Anxiety
☐ Poor control of BMs, urgency	☐ Depression
*	☐ Mood swings
Urinary: Nothing in this group	☐ Phobias, fears
Burning with urination	☐ Panic attacks
☐ Weak urine stream	☐ Suicide thoughts or attempts
☐ Blood in urine	
☐ Gas or stool in urine	Endocrine: Nothing in this group
☐ Poor control, leakage of urine	Heat or cold intolerance
☐ Kidney stones	Excessive thirst
☐ Prostate problems	☐ Excessive urination
☐ Testicular mass	☐ Excessive Sweating
Get up at night to urinate - Number of times per night	
Gynecologic (female): Nothing in this group	Hematologic, Lymphatic: Nothing in this group
Irregular periods - Last period: 0/20 110	Prior blood transfusion
Abnormal vaginal discharge	Easy bleeding or bruising
	Low red blood cell count (anemia)
Breast: Nothing in this group	Low white blood cell count
☐ Breast lump	Prolonged bleeding with cuts, surgery
☐ Breast pain	Swollen glands
☐ Nipple discharge	☐ Blood clots
	Use of blood thinners
Skin: Nothing in this group	Swollen lymph nodes
Rásh	All
Skin Infections	Allergic, immunologic: Nothing in this group
Ulcers or sores	☐ HIV infection
Yellowing of the skin	Hepatitis
☐ Eczema, psoriasis, other	☐ Imune deficiency
☐ Pyoderma gangrenosum, erythema nodosum	☐ Antibiotics needed for dental work



Vida Sp.a 3225 S. Rainbow Blvd, Ste 107 Las Vegas, NV 89146 www.vidaspalv.com

DIFFICULTIES WITH LOCAL OR GENERAL ANESTHESIA EXPLAIN HAVE YOU EVER HAD A BLOOD TRANSFUSION? YES NA ALLE YOU PREGNANT? YES HAVE YOU EVER HAD HAVE OR BEEN EXPOSED TO (PLEASE GIRCLE YES OR NO) YES NO INTRAVENOUS DRUGS YES NO HEPATITIS YES NO HEPATITIS YES NO HIV/AIDS YES NO HIV/AIDS	H. EEDING PROBLEMS		www.vidas _i			
DI YOU HAVE A FAMILY HISTORY OF BLEEDING PROBLEMS? EXPLAIN BIFFICILITIES WERTH DOAD ORIGINATED AND PROBLEMS? EXPLAIN HI VEX VO EVERHAD PRECODERS AND PROBLEMS OF YES HI VEX VO EVERHAD PRECODERS AND PROBLEMS OF YES HI VEX VO EVERHAD PRECODERS AND PROBLEMS OF YES HI VEX VO EVERHAD PRECODERS AND PROBLEMS OF YES OF HIV AIDS VES HIV AIDS REVIEW OF Systems: Do you currently have any of the following symptoms or conditions (Check if yes) General Force General Force Chest pain Polytections Force Chillis Night Sweats Franting Speals Eyes: Nothing in this group General Force Chillis Systems: Occuping up blood Blurred or double vision Ear, Nose, Mouth, Throat: Nothing in this group Hearing loss Garden pain with walking Bround hearing loss Garden pain with walking Hearing loss Garden pain with walking Hearing loss Garden pain with walking Hearing loss Garden pain with activity Short of breath with activity Short of breath with activity Hearing loss Garden pain with walking Hearing loss Garden problems Nose Bleeda Musculoskaletal: Nothing in this group Joint pain Musculoskaletal: Nothing in this group Joint pain Recent voice change Runny nose / cold Joint pain Neck stiffness / pain	DO YOU BRUISE OR BLEED EASILY? YES WE (WITH CUTS	/ тоотн ехтр	ACTIONS / PREGNANCY / SURGERY)			
HIVEYOU EVERTIAD SECONDENSIONS YES HIVEYOU SYSTEMAN SECONDENSIONS YES HIVEYOUS SYSTEMAN SECONDENSIONS HIVEYOUS SECOND. HIVEYOUS SECONDENSIONS HIVEYOUS SECONDENSIONS HIVEYOUS SECO	EUPLAIN_					
HILYENOU EVERHADWELGOD/TRANSFUSION: YES HILYOUTERSANT REPAITITS YES HILYOUTERSANT YES HEPAITITS HILYOUTERSANT YES HILYOUTERSANT YES HEPAITITS HILYOUTERSANT YES HEPAITITS HILYOUTERSANT YES HILYOUTERSANT YES HILYOUTERSANT YES HILYOUTERSANT YES HEPAITITS HILYOUTERSANT YES HILYOUTERSANT HILYOUTERSANT YES HILYOUTERSANT YES HILYOUTERSANT YES HILYOUTERSANT YES HILYOUTERSANT HILYOUTERSANT YES HILYOUTERSANT HILYOUTERSANT YES HILYOUTERSANT YES HILYOUTERSANT HILYOUTERSANT YES HILYOUTERSANT YES HILYOUTERSANT HILYOUTERSANT YES HILYOUTERSANT HILYOUTERSANT YES HILYOUTERSANT HILYOUTERSANT HILYOUTERSANT YES HILYOUTERSANT HILYOUTERSANT YES HILYOUTERSANT HILYOUTERSANT YES HILYOUTERSANT	DO YOU HAVE A FAMILY HISTORY OF BLEEDING PROBLEMS? EXPLA	Old MI				
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HIVE YOU EXPERIENCE AND CREEKENEX POSED TO (PEPSE CURRETY YES OR NO) INTRAVENOUS DRUGS INTRAVENOUS DRUGS YES INTRAVENOUS DRUGS INTRAVENOUS DRUGS YES INTRAVENOUS DRUGS INTRAVENOUS DRUGS YES INTRAVENOUS DRUGS INTRAVENOUS DRUGS INTRAVENOUS DRUGS YES INTRAVENOUS DRUGS I	ADDITION OF THE PROPERTY OF TH	Š				
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Review of Systems: Do you currently have any of the following symptoms or conditions (Check if yes) Generat: Nothing in this group Weight loss - How much Ibs Chest pain Loss of Appetite Palpitations Fever Heart valve problems Calf pain with walking Night Sweats Leg swelling Eyes: Nothing in this group Chronic couph Eye disease or injury Chronic couph Wear glasses or contacts Short of breath with activity Blurred or double vision Short of breath with activity Hearing loss Ashma Ear ache / Infection Bronchitis Ringing in ears Pneumonia Nose Bleeds Bleeding gums Musculoskelatal: Nothing in this group Mouth sores Joint pain Sore throat Hindils Recent voice change Muscule weakness Calf pain with valking Wheezing Muscule weakness Leg pain with walking Leg pain at rest	YIII MQ INTRAVENOUS DRUGS					
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Weight loss – How much	IF YES TO ANY EXPLAIN	YES	LIVER TRANSPLANT			
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Weight loss – How much	4					
Weight loss – How much						
Weight loss – How much	Review of Systems: Do you currently have	any of the fell	outles a material and the second seco			
Weight loss - How muchibs Chest pain Palpitations	General: Nothing in this group	arry of the foll	Cardiovascular (Nothing in this group			
Loss of Appetite Palpitations Heart valve problems Chills Heart valve problems Calf pain with walking Leg swelling Leg swelling Leg swelling Eyes: Nothing in this group Chronic cough						
Fever						
Chills	Fever					
Night Sweats Leg swelling Fainting Spells Eyes:	Chills					
Fainting Spells Eyes:	☐ Night Sweats					
Eye disease or injury	☐ Fainting Spells					
Eye disease or injury	Fyes: [] Nothing in this group		Respiratory: Nothing in this group			
Wear glasses or contacts Blurred or double vision Ear, Nose, Mouth, Throat: Nothing in this group Hearing loss Bar ache / infection Ringing in ears Nose Bleeds Bleeding gums Bleeding gums Mouth sores Sore throat Recent voice change Runny nose / cold Sinus problems Neck stiffness / pain Coughing up blood Short of breath with activity	i i					
Blurred or double vision						
Short of breath lying flat Wheezing Asthma Asthma Bronchitis Pneumonia Musculoskeletal: Nothing in this group Joint pain Recent voice change Runny nose / cold Sinus problems Leg pain with walking Leg pain at rest Leg pain at rest	ł · · · · · · · · · · · · · · · · · · ·					
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☐ Hearing loss ☐ Asthma ☐ Ear ache / infection ☐ Bronchitis ☐ Ringing in ears ☐ Pneumonia ☐ Nose Bleeds ☐ Musculoskeletal: ☐ Nothing in this group ☐ Mouth sores ☐ Joint pain ☐ Sore throat ☐ rthritis ☐ Recent voice change ☐ Back pain ☐ Runny nose / cold ☐ Muscle weakness ☐ Sinus problems ☐ Leg pain with walking ☐ Neck stiffness / pain ☐ Leg pain at rest	Ear, Nose, Mouth, Throat: Nothing in this grou	р				
□ Ringing In ears □ Pneumonia □ Nose Bleeds □ Musculoskeletal: □ Nothing in this group □ Mouth sores □ Joint pain □ Sore throat □ rthritis □ Recent voice change □ Back pain □ Runny nose / cold □ Muscle weakness □ Sinus problems □ Leg pain with walking □ Neck stiffness / pain □ Leg pain at rest	☐ Hearing loss					
Nose Bleeds ☐ Preumonia Bleeding gums Musculoskeletal: ☐ Nothing in this group Mouth sores ☐ Joint pain ☐ Sore throat ☐ rthritis ☐ Recent voice change ☐ Back pain ☐ Runny nose / cold ☐ Muscle weakness ☐ Sinus problems ☐ Leg pain with walking ☐ Neck stiffness / pain ☐ Leg pain at rest	☐ Ear ache / infection		☐ Bronchitis			
Nose Bleeds Bleeding gums Mouth sores Sore throat Recent voice change Runny nose / cold Sinus problems Neck stiffness / pain Musculoskeletal: ☑ Nothing in this group Joint pain rthritis Back pain Muscle weakness Leg pain with walking Leg pain at rest	☐ Ringing in ears		☐ Pneumonia			
	☐ Nose Bleeds					
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☐ Recent voice change ☐ Runny nose / cold ☐ Muscle weakness ☐ Sinus problems ☐ Neck stiffness / pain ☐ Leg pain at rest	☐ Mouth sores					
☐ Runny nose / cold ☐ Muscle weakness ☐ Sinus problems ☐ Leg pain with walking ☐ Neck stiffness / pain ☐ Leg pain at rest	☐ Sore throat					
☐ Sinus problems ☐ Leg pain with walking ☐ Leg pain at rest ☐ Leg pain at rest	☐ Recent volce change					
☐ Neck stiffness / pain ☐ Leg pain at rest	☐ Runny nose / cold					
Took dillinos / pair	☐ Sinus problems		Leg pain with walking			
☐ Enlarged neck glands / masses ☐ Broken bones	☐ Neck stiffness / pain					
	☐ Enlarged neck glands / masses		☐ Broken bones			



1 telis "spat 3225 S. Rainbow Blyd, Ste 107 Las Vegas, NV 89146 www.vidaspaly.com

Patient Profile	,								
Name:					Date:				
Address:					City:	,			
State	Zip:			_	Home Phon	e: _			
Work Phone:				•	Cell Phone:				
Age: 3 4	DOB:				Preferred Co	ontact#			
Occupation:	Stice		reih		Employer:				
SSN:					Driver's Lic	ense:			
Email:		_	•						
Medical Questio	nnaire								
Medical History			(Plea se	circle yes	or no)				
Diabetes	•	Yes	No		High Choles	sterol	Yes	No	
High Blood Pres	sure	Yes	Nb			eart Disease	Yes	No	
Heart Attack		Yes	Nb		Blocked Art		Yes	No	
Heart Disease		Yes	No		Stroke/TIA	,	Yes	No	
Multiple Scleros	is	Yes	No		Parkinson's	disease	Yes	No	
Epilepsy		Yes	No		Liver Diseas	se	Yes	No	
Hepatitis		Yes	No		Kidney Dise	ease	Yes	No	
Bowel Problems	3	Yes	No		Prostate Dis	ease (BPH)	Yes	No	
Prostate Cancer		Yes	Nþ		Peyronie's I	Disease	Yes	No	
Sexually Transn		Yes	Np		HIV Infecti	on/AIDS	Yes	No	
Blood Transfusi	on	Yes	Nþ		Major Depr	ession	Yes	No	
Tuberculosis Other PCO)	Yes	Nþ 		Bleeding Di	sorder	Yes	No	
Current medical	ions (pill	s, injecti	ons, laxat	ives, sedat	ives, vita m ir	ns, others)			
Surgery		1							
Heart	Yes	No		Blocked	Artery	Yes	No		
Prostate	Yes	Nþ		Penis		Yes	No		
Bowel	Yes	No		Bladder		Yes	No		
Hemia	Yes	No		Vasector	ny	Yes	No		
Scrotum/Test Other	Yes	Nø		Spine		Yes	No		
Previous Urolog							1		
Kidneys	Yes	No		Penis		Yes	No		
Bladder	Yes	No		Testicles		Yes	No		
Prostate	Yes	No		Urine		Yes	No		
<u>Injuries</u>		1							
Head	Yes	No		Back		Yes	No		



Fldg Spil

3225 S. Rainbow Bivd, Ste 107 Las Vegas, NV 89146 www.vidaspalv.com

Pelvis Other	Yęs	No	Penis		Yes	_z No		
History of Recre Alcohol? Smoking? Recreational Dn	No No	Yes Yes	How Much?	2 WEEV	How Ofter	1?		
Family History Diabetes Cancer of the Pro	ostate	Yes Yes		ure Heart Attack lood Pressure	Yes Yes	-No No		
Social History: Marital Status: Physical Activity	Single		Divorced Se	parated Wido derate Heav				
<u>Allergies</u> Have you ever h	ad an al	lergic reac	ion to any medic	ations? Yes	(No.)			
If yes, please pro	vide de	tails:						
<u>Please provide y</u> Family Physiciar		ent physici Name	ans:	Phone	Specia Phi W	lty 17(V	Last Visit _10 / 201 7	
Specia list					_ 1	l	•	-
Specia list								_
General Surge	ery PA	TIENT H	ISTORY FOR	M Name:				
DOB		Age:	Date:		Ref	erring D	octor:	
Vital Signs: Te Wt:	emp: _ _ Med	lication A	_ HR: llergies:	BP:	F	RR:	Ht:	
						Medica	tion Dose Frequ	uency
# ye Alcoholic beve	: Single ars erage o	equency and a consumption of the	Social History: I Divorced Wid affeine Use: N tion: No Yes (I	Occupation: dowed Tobaco to Yes (If yes If yes, how mo	co Use: I , check a uch and	No Yes all that a	(If yes, # of pac pply: Coffee Te	_ ks/day a Soda)
often) Medi	cal History: H	TN Hear	t Diseas	e Diabetes Stro	ke



Tida Ga

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Anxiety Depression Asthma GERD Cancer Other:	
	Surgica
History: Appendectomy Cholecystectomy Thyroidectomy Hemorrhoidectomy Mammog Hysterectomy Breast Surgery Tubal litigation Colonoscopy Hernia Repair (location/type	
Other:	
Family History: Please describe any additional problem/concerns which you	think the
Physician should be made aware of:	
Diabetes Heart Disease HTN Cancer Other Mother Father Sister Brother	
Grandfather Grandmother Aunt Uncle	



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VASER LIPO INFORMED CONSENT FORM

This is an informed-consent document that has been prepared to help educate you on the VASER Lipo procedure, its risks, and alternative treatment.

It is important that you read this information carefully and completely. Please initial each page, indicating that you have read the page, and sign the Consent for Surgery as proposed by your surgeon.

VASER Lipo is a surgical technique to remove unwanted deposits of fat from specific areas of the body, including the face and neck, upper arms, upper and lower back, abdomen, buttocks, hips, inner and outer thighs, knees, calves, and ankles. This is not a substitute for weight reduction, but a method for removing localized deposits of fatty tissue. VASER Lipo may be performed as a primary procedure for body contouring or may be combined with other surgical techniques.

The best candidates for VASER Lipo are individuals of relatively normal weight who have excess fat in particular body areas. Having firm, elastic skin will result in a better final contour after lipoplasty. Skin that has diminished tone due to stretch marks, weight loss, or natural aging will not reshape itself to the new contours and may require additional surgical techniques to remove and tighten excess skin. Body-contour irregularities due to structures other than fat cannot be improved by this technique. Lipoplasty itself will not improve areas of dimpled skin known as "cellulite".

The VASER Lipo procedure is performed utilizing advanced proprietary technology. A patented grooved solid metal probe is first inserted through one or more small skin incisions. Ultrasonic energy emitted from the sides and end of the probe as it is passed back and forth breaks down fatty deposits. A hollow metal surgical instrument known as a cannula is then inserted and is directed through the area of emulsified fat cells. The cannula is attached to a vacuum source, which provides gentle suction to remove the emulsified fat. Because the VASER Lipo procedure is unique in that it first targets and dissolves fat cells and then draws out emulsified fat, leaving the collagen matrix intact, surgical trauma, complications and the potential for post-operative pain and bruising are minimized while skin retraction is optimal.

VASER Lipo may be performed under local or general anesthesia and requires the infiltration of fluid containing dilute local anesthetic and epinephrine into areas of fatty deposits. This technique can reduce discomfort at the time of surgery, as well as reduce post-operative bruising.

Support garments and dressings are worn after surgery to control potential swelling and promote healing, to provide comfort and support, and to help skin better fit new body contours. Your surgeon may recommend that you make arrangements to donate a unit of your own blood that would be used if a blood transfusion were necessary after surgery.

ALTERNATIVE TREATMENT

Alternative forms of management include not treating the areas of fatty deposits, and diet and exercise regimens that may be of benefit in the overall reduction of excess body fat. Direct removal of excess skin and fatty tissue may be necessary in addition to lipoplasty in some patients. Risks and potential complications are associated with alternative forms of treatment that involve surgery.

Patient Initials:

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RISKS AND SIDE EFFECTS

Every surgical procedure involves a certain amount of risk, and it is important that you understand the risks involved with the VASER Lipo procedure. An individual's choice to undergo a surgical procedure is based on the comparison of the risk to potential benefit. Although the majority of patients do not experience these complications, you should discuss each of them with your surgeon to make sure you understand the risks, potential complications, and consequences of VASER Lipo.

Patient Selection: Individuals with poor skin tone, medical problems, or unrealistic expectations may not be candidates for VASER Lipo.

Allergic Reactions: Rarely, local allergies to tape, suture material, or topical preparations utilized in hipoplasty procedures have been reported. More serious systemic reactions due to drugs administered during surgery and prescription medicines may require additional treatment.

Asymmetry: Due to factors such as skin tone, bony prominence, and muscle tone, which can contribute to normal asymmetry in body features, it may not be possible to achieve symmetrical body appearance through lipoplasty procedures.

Bleeding: While unusual, it is possible to have a bleeding episode during or after surgery. Should post-operative bleeding occur, it may require emergency treatment to drain accumulated blood or require a blood transfusion. Non-prescription herbs and dietary supplements can increase the risk of surgical bleeding. Do not take any aspirin or anti-inflammatory medications for 2 weeks before surgery, as this may increase the risk of bleeding. Please review our Medication Alert for products and ingredients to be avoided for 2 weeks prior to and 2 weeks following your scheduled VASER Lipo procedure. and consult your doctor before taking anything.

Change in Skin and Skin Sensation: A temporary decrease in skin sensation may occur following VASER Lipo. This usually resolves over a period of time. Diminished or complete loss of skin sensation that does not totally resolve could potentially occur, as it infrequently has with various lipoplasty procedures.

Chronic Pain: Chronic pain and discomfort following VASER Lipo is unusual, but possible.

Infection: Infection is uncommon following this type of surgery. Should an infection occur, treatment with antibiotics or additional surgery may be necessary. Although extremely rare, life-threatening infections such as toxic shock syndrome could occur after lipoplasty surgery, regardless of the technology utilized.

Pulmonary and Systemic Complications: In extremely rare cases, fat droplets could become trapped in the lungs to create a possibly fatal complication called fat embolism syndrome. Pulmonary complications may occur secondarily to blood clots (pulmonary emboli) or partial collapse of the lungs after general anesthesia. Should either of these complications occur, you may require hospitalization and additional treatment. In some circumstances, pulmonary emboli can be life-threatening or fatal.

Long-term Effects: Subsequent alterations in body contour may occur as a result of aging, weight loss or gain, pregnancy, or other circumstances not related to VASER Lipo.

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Scarring: Although the incisions created for VASER Lipo are minimal and good wound healing after a surgical procedure is expected, abnormal scars may occur within the skin and deeper tissues in rare cases. Such scars may be unattractive and of a different color than the surrounding skin. Additional treatments, including surgery, may be necessary to treat abnormal scarring.

Seroma: While VASER Lipo has reduced the incidence and severity of seromas associated with lipoplasty procedures, such fluid accumulation is possible and could require additional treatments or surgery to promote drainage.

Bruising and/or Swelling: Although VASER Lipo typically reduces or eliminates bruising and swelling normally resulting from lipoplasty procedures, bruising and swelling may occur and, in rare situations, persist for extended periods of time.

Skin Contour Irregularities: Since VASER Lipo selectively targets fat cells, leaving other essential tissues intact, skin contour irregularities and depressions in the skin are unlikely but possible. Visible and palpable wrinkling of skin can occur, particularly when large quantities of fat cells are removed and/or the skin is lacking good elasticity. Post-operative skin contour irregularities could necessitate additional treatments including surgery.

Skin Loss: Additional treatments including surgery could be necessary in the unlikely event that skin loss occurs following your VASER Lipo treatment.

Surgical Anesthesia: All forms of surgical anesthesia or sedation, whether administered locally or generally, carry risks including the possibility of complications, injury, and even death. You will probably be required to sign a separate anesthesia consent form in preparation for your surgery.

Surgical Shock: VASER Lipo could conceivably cause severe trauma, particularly when multiple or extensive areas are treated in a single session. Although serious complications are a rarity, infections or excessive fluid loss can lead to severe illness and even death. Should surgical shock occur following your VASER Lipo treatment, hospitalization and additional treatment would be necessary. Individuals undergoing VASER Lipo procedures to remove large volumes of fat are at a greater risk of complications. Patients contemplating large-volume lipoplasty (greater than 5000 cc removed) may be advised to undergo post-operative monitoring and aftercare that involves overnight hospitalization.

Lidocaine Toxicity: There is the possibility that large volumes of fluid containing dilute local anesthetic drugs and epinephrine that is injected into fatty deposits during surgery may contribute to fluid overload or systemic reaction to these medications. Additional treatment including hospitalization may be necessary.

Ultrasonic Technology: Risks associated with the use of ultrasound in lipoplasty treatments include the aforementioned and the following specific risks:

Burns: Ultrasonic energy may produce burns and tissue damage if the probe touches the undersurface of the skin for prolonged periods of time. If burns occur, additional treatment and surgery may be necessary.

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Probe Fragmentation: Ultrasonic energy produced within the probe(s) may cause disintegration (fragmentation) of the surgical instrument. The occurrence and effect of this is unpredictable. If this should occur, additional treatment including surgery may be necessary.

Unknown Risks: The long term effect on tissue and organs of exposure to short-duration, high-intensity ultrasonic energy is unknown. The possibility exists that additional risk factors resulting from the use of ultrasound in VASER Lipo could potentially be discovered.

Other: While we have attempted to assist you in building realistic expectations for your VASER Lipo treatment, you may be disappointed with your surgical results. However infrequent, it may be necessary in your case to perform additional surgery to improve results.

ADDITIONAL SURGERY NECESSARY

There are many variable conditions in addition to risk and potential surgical complications that may influence the long term result of VASER Lipo. Even though risks and complications are unusual, the risks cited previously are particularly associated with lipoplasty procedures utilizing suction and/or ultrasound technologies. Other complications and risks can occur but are even more uncommon. If complications should occur, additional surgery or other treatments may be necessary. The practice of medicine is not an exact science. Although good results are expected, there is no guarantee or warranty expressed or implied on the results that may be obtained.

FINANCIAL RESPONSIBILITIES

The cost of surgery involves several charges for the services provided. The total includes fees charged by your doctor, the cost of surgical supplies, anesthesia, laboratory tests, and possible outpatient hospital Charges, depending upon where the surgery is performed. Due to the proprietary nature and expense of the technology utilized, your bill may reflect a separate and additional fee for the use of VASER equipment specific to your procedure. Based upon whether the cost of surgery is covered by an insurance plan, you will be responsible for necessary copayments, deductibles, and charges not covered. As an elective, cosmetic procedure, VASER Lipo is not typically covered by insurance, placing full responsibility for payment upon the patient. You may incur additional costs should complications develop from the surgery. Secondary surgery or hospital day-surgery charges incurred due to remedial surgery are also the responsibility of the patient.

Patient Initials:



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DISCLAIMER

Informed-consent documents are used to communicate information about the proposed surgical treatment of a disease or condition along with disclosure of risks and alternative forms of treatment(s). The informed consent process attempts to define principles of risk disclosure that should generally meet the needs of most patients in most circumstances.

However, informed consent documents should not be considered all inclusive in defining other methods of care and risks encountered. Your surgeon may provide you with additional or different information that is based on all the facts in your particular case and the state of medical knowledge.

Informed-consent documents are not intended to define or serve as the standard of medical care. Standards of medical care are determined on the basis of all of the facts involved in an individual case and are subject to change as scientific knowledge and technology advance and as practice patterns evolve. It is important that you read the above information carefully and have all of your questions answered before signing the the next page.

Patient Initials: MR

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I have received and read the information: VASER® Lipo Informed Consent

I understand that VASER Lipo is an elective surgery procedure to remove body fat from specific area(s) of the body.

The procedure has been explained to me in a way that I understand. I have had the opportunity to ask questions, and my questions have been answered. Alternative methods of treatment have been discussed with me.

I acknowledge that no guarantee has been given by anyone as to the results that I may obtain. Although a good result is expected, I understand that there are risks to the procedure or treatment proposed, as detailed in the preceding information pages.

consent to the administration of such anesthetics considered necessary or advisable. I understand that a/l forms of anesthesia involve risk and the possibility of complications, injury, and sometimes death.

For purposes of advancing medical education, I consent to the admittance of observers to the operating room.

I consent to the disposal of any tissue, medical devices or body parts which may be removed.

I authorize the release of my Social Security number to appropriate agencies for legal reporting and medical device registration, if applicable.

Having discussed the reasonable expectations of the VASER Lipo procedure with me and answered all of my questions to my satisfaction, I hereby authorize and such assistants as may be selected to perform VASER Lipo and any other procedure(s) that in their judgment may be necessary or advisable should unforeseen circumstances arise during surgery.

With my signature below I hereby consent to having VASER Lipo and to the above.

Please rewrite in your own handwriting: "I understand that the practice of medicine is not an exact science and although good results are expected, there can be no guarantee as to the results."

Patient Initials: MY

6



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NSBME 0057

l certify that I, and/or a member of Vida Spa staff, have discussed all of the above with the patient and answered all questions regarding the VASER Lipo procedure. I believe the patient fully understands and all questions have been answered.

Clinician Signature	Date
I am a smoker of tobacco:	3
I understand that tobacco smoking increases health risks. Doct not possible, to drastically reduce the amount of my smoking, a weeks after my surgery.	tor and staff have advised me to stop smoking and, if that is and to discontinue all smoking for two weeks before and two
It has been explained to me that there is decreased circulation this can cause a delay in wound healing as well as skin breakdo	
As a smoker, I understand that the surgery will have to be mor these complications, which may still occur, despite the doctor's	re conservative and less aggressive than usual to try to avoid s best efforts to avoid them.
This has been fully explained to me and I relieve Vida Spa frosmoking habits.	om any responsibility related to the increased risks from my
Patient Signature	Date
I am a non-smoker of tobacco: Patient Signature	~
I do not use social drugs.	
Patient Signature	_
Patient name (please print):	-
DOB:	
Requested By:	
Patient Initials: 1	



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1. the above-named patient, hereby consent that photographs, videotape, and/or computer imaging may be taken of me or of parts of my body under the following conditions:

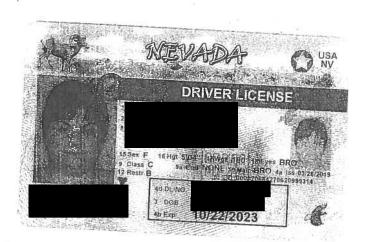
Pre- and post-operative photographs will be taken of my treatment for record purposes. The photographs will be taken by my physician or a photographer approved by my physician. I understand that these photographs will be the property of the attending physician and Vida Spa.

I understand that all computer imaging viewed is only a representation of the result that could be achieved through this procedure and that imaging is used as an educational tool to benefit the patient without guarantee of any result.

I have had the opportunity to discuss this consent with my surgeon and agree that all of my questions have been answered. This authorization is granted in furtherance of medical education and other good and valuable consideration and as a voluntary contribution. I hereby waive all rights I might have to photographs, videotape, and computer images and do hereby release, discharge, and save harmless Vida Spa and their employees and agents from all claims and liabilities whatsoever in law and in equity arising from such use.

I have read and fully understand and consent to all the above items contained in this form.

Patient Signature	_Date _	10/-	7	19
		1 '		





Pharmacy: WalMart
7200 Amoyo Crsg Pkwy
702-210-6003

Meds to call in:

- Tramadol (ustram) 50mg 7-77 PO Q 4-6° pro pain x3d. # 20 ICD 10 code E88.1 (lipedystrophy)
- (2) Promethazine (Phenergan) 25mg † PO Q 6° prn nausea #12
- 3 Bactom DS = POBID x 10 days

LMom 5150pm 10/1/19 Jell



Report Prepared: 12/28/2020

Patient History Results

Date Range: 12/28/2019 - 12/28/2020

Report Criteria

AWARXE	12/28/2020 10:13 AM	Licensing Board Investigator	Kim	Friedman		1964	
AWARXE	12/28/2020 10:15 AM	Licensing Board Investigator	Kim	Friedman			
AWARXE	12/28/2020 10:15 AM	Licensing Board Investigator	Kim	Friedman			
▼ Requestor Source	Date	User Role	Requestor First Name	Requestor Last Name	Patient DOB	Patient First Name	Patient Last Name
			Patient History	Patier			

Disclaimer:

I understand and agree that by proceeding beyond this page and accessing this Prescription Monitoring Program (PMP) system, I certify that I am active healthcare

PMP system for such a purpose. I understand that my use of this PMP system is permitted only in connection with obtaining information for an open investigation, and certify that I am accessing the

other health care information. I will protect any PMP information in my possession in accordance with federal and state laws governing health care information. I understand that the information in the PMP system is confidential pursuant to NRS 453.1545. I must treat the information as confidential, just as I would protect any

disciplinary action, civil penalties or criminal action. I understand that my access to, or disclosure of, any PMP data for any purpose other than obtaining information for an open investigation may subject me to

I understand that I am responsible for all use of my username and password. I will never share my password with anyone, including my co-workers and staff. If my authentication or password is lost or comprised, I agree to notify the PMP immediately.

I understand the PMP administrator will conduct auditing activities to monitor for unusual or potentially unauthorized use of the system.

30 Day Avg mg/day:	Current mg/day:	Current Qty:	Buprenorphine	
0.00	0.00	0		
N	SE	ВM	Ε(0062

Summary		Narcotics * (excluding buprenorphine)	buprenorphine)	Sedatives
Total Prescriptions:	2	Current Qty:	0	Current Qty:
Total Prescribers:	2	Current MME/day:	0.00	Current mg/day:
Total Pharmacies:	2	30 Day Avg MME/day:	0.00	30 Day Avg mg/day:

Prescriptions

									⊞ E881					
Ş	Medicaid NV	33.33 MME	0/0	4453566 Wal (1948)	4453566	Sh Was	ω	20.00 3	Tramadol Hcl 50 Mg Tablet	10/07/2019	10/07/2019	2	10/07/2019 2	
N	a		0/0	1006316 Abs (1939)	1006316	0.00 56 Ri Smi	56	0.00	Chorionic Gonadotropin Powder	06/04/2020	06/03/2020	_	06/04/2020	
PMP	Pymt Type	Daily Dose * Pymt Type PMP	Refil	Pharmacy	Rx#	Qty Days Prescriber	Days	aty	Drug	Sold	ID Written	6	Fill Date	

Prescribers

Name	Address	City	State	Zipcode	Phone
Richard M Smith, Md	1010 E Busch Blvd Ste 103	Tampa	P	33612	(727) 255-3652
Sherman Washington, Jr 1409	1409 E Lake Mead Blvd	North Las Vegas	N	89030-7120	(702) 202-3050

Pharmacies

Name	Address	City	State	Zipcode	Phone
Absolute Pharmacy, Llc (1939)	16011 N Nebraska Ave Ste 103	Lutz	P	33549	(813) 999-2700
948)	sing Pkwy	Las Vegas	× ×	89113-4058	(702) 270-2523

Disclaimer

Report contents are based on data entered by dispensers and their staff, and may contain errors. The Board of Pharmacy recommends independent verification with dispensers when prudent or necessary. Willful disclosure of prescription information may be subject to disciplinary action, civil penalties or criminal action.

Demographic
Linked Records
Name DOB
Search Criteria
First Name

Risk Indicators

NARXCARE SCORES

OVERDOSE RISK SCORE

Narcotic Sedative Stimulant 000 000 000

(Range 000-999)

or the prescriber. NarxCare scores and reports are intended to aid, not replace, medical decision making. None of the information presented should be used as sole justification for providing or This NarxCare report is based on search criteria supplied and the data entered by the dispensing pharmacy. For more information about any prescription, please contact the dispensing pharmacy

refusing to provide medications. The information on this report is not warranted as accurate or complete.

Page 2 c

ADDITIONAL RISK INDICATORS (0)

INFORMATION GRAPH

Prescribers
1 - Richard M Smith, Timeline

12/28

2m

6m

Ty

24

overdose risk in the same dose-dependent manner as doses for full agonist opioids. MME = morphine milligram equivalents. LME = Lorazepam milligram equivalents. MG = dose in milligrams. thresholds meant for opioids prescribed for pain. Buprenorphine products have no agreed upon morphine equivalency, and as partial opioid agonists, are not expected to be associated with *Per CDC guidance, the MME conversion factors prescribed or provided as part of the medication-assisted treatment for opioid use disorder should not be used to benchmark against dosage

Timeline	Lorazepam MgEq (LME) 18	Timeline	Morphine MgEq (MME)	Buprenorphine mg 28 16 4 0 Timeline
02	q (LME)	320 200 80 0	(MME)	mg 28 16
12/28		12/28		12/28
2m		2m		2m
6m		6m		бт
14		19		14
V2		24		24

Summary Summary Total Prescribers: Total Prescriptions: Narcotics * (excluding buprenorphine) Current Qty: Current MME/day: 0.00 Sedatives Current mg/day: Current Qty: 0.00 0.00 0 Buprenorphine 30 Day Avg mg/day: Current mg/day: Current Qty: 0.00 0.00 **NSBME 0067**

Prescriptions

Total Pharmacies:

30 Day Avg MME/day:

0.00

30 Day Avg mg/day:

06/04/2020 1	Fill Date ID
06/03/2020	Written
06/04/2020	Sold
Chorionic Gonadotropin Powder	Drug
0.00 56	Qty
56	Qty Days
Ri Smi	Prescriber
1006316	Rx #
06316 Abs (1939) 0/0	Pharmacy
0/0	Refill
	Daily Dose * Pymt Type
Private Pay	Pymt Type
K	PMP

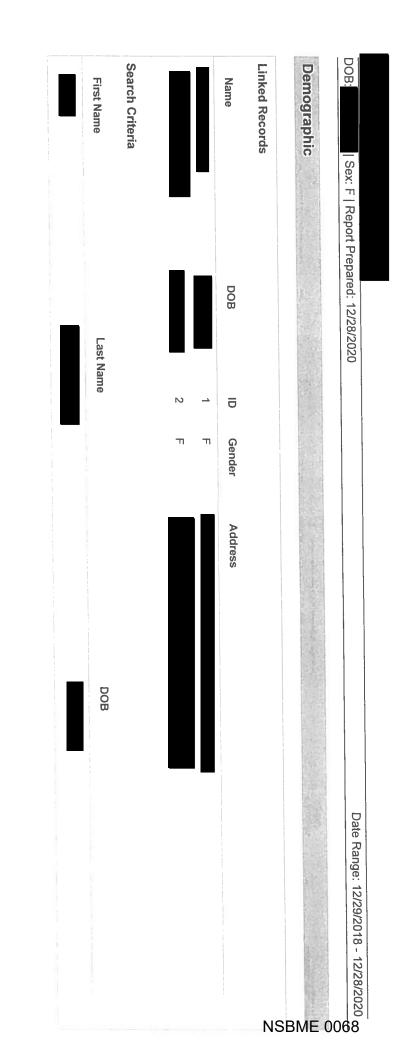
Prescribers

Richard M Smith, Md	Name
103	Address
Tampa	City
크	State
33612	Zipcode
(727) 255-3652	Phone

Pharmacies

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Page 2 o

Risk Indicators

NARXCARE SCORES

Narcotic Sedative Stimulant 030 010 000

OVERDOSE RISK SCORE

ADDITIONAL RISK INDICATORS (0)

NSBME 0069

(Range 000-999)

or the prescriber. NarxCare scores and reports are intended to aid, not replace, medical decision making. None of the information presented should be used as sole justification for providing or

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refusing to provide medications. The information on this report is not warranted as accurate or complete.

overdose risk in the same dose-dependent manner as doses for full agonist opioids. MME = morphine milligram equivalents. LME = Lorazepam milligram equivalents. MG = dose in milligrams. thresholds meant for opioids prescribed for pain. Buprenorphine products have no agreed upon morphine equivalency, and as partial opioid agonists, are not expected to be associated with *Per CDC guidance, the MME conversion factors prescribed or provided as part of the medication-assisted treatment for opioid use disorder should not be used to benchmark against dosage

Timeline	Lorazepam	Timeline	Morphine MgEq (MME)	Timeline	Buprenorphine mg
10 2 2	Lorazepam MgEq (LME)	320 200 80	ngEq (MME)	0.4 16 28	hine mg
12/28		12/28		12/28	
2m		2m		2m	
6m		бт		6m	
14		14		14	
24		24		Zy	

PAT LAST NAME FIRST FAI ADDRESS	PAT PHONE# BIRTH DATE
; NUMBER DRUG NAME DOC ADDRESS DOC NAME DOC ADDRESS CTL PLAN RX IMAGE ID DOC PHONE# DEA#	EA#
ATE QTY REFILLS DAYS SUPPLY RX COMMENTS DATE CIND ENT/VER FILL QTY REFILL CUST AMT TOT AMT FILL SOLD DATE CLAIM # BR AUTH BY	PARTIAL CODE PLAN
; 1351019 METRONIDAZOLE 500MG TABLETS ACTAVIS ,OPEZ-BENITEZ, L 6850 N DURANGO DR LAS VEGAS, NV 89121 SIG: TK 1 T PO BID FOR 7 DAYS 01/06/2016 14 0 0 0	100516 L0382010
01/06/2016 RAR/NRB 0 0	

PAT LAST NAME FIRST		PAT ADDRESS				PAT PHONE# BIRTH DATE
: NUMBER DRUG NAME DOC ADDRESS ORIG DATE QTY REFILLS DAYS SI ENTER DATE CIND ENT/VER FILL QTY AUTH NBR AUTH BY	DRUG M DRESS REFILLS DAYS SUPPLY RX COMMENTS NT/VER FILL QTY REFILL	DRUG MER COMMENTS CUST AMT	TOT AMT	CTL PLAN DO	RX IMAGE ID DOC PHONE# I	DEA# PARTIAL CODE
; 1349602 MICROGESTIN 1/20 FE	TABS 28S	ACTAVIS		RX NVMED	0457993145151547416	547416
: 1349602 MICROGESTIN 1/20 FE TABS 28S .OPEZ-BENITEZ, L 6850 N DURANGO DR LAS VEGAS, NV 89121 SIG: TK 1 T PO OD	TABS 28S DR LAS VEGAS, NV	ACTAVIS 89121		RX NVMED	0457993145151547416 (702)476-1100 FL0382010	547416 L0382010
SIG: TK 1 T PO QD XFER TO STORE: 0 RX#: 0C CLOSE CMMTS: RICHARD 12/30/2015 28 12	RX#: 0000000 RPH INIT:	ENT INIT: NRB	02/19/2016 XFER	16 XFER FROM STORE DEA: XFER COMPETITOR WALMART	DEA:	RPH INIT: NRB (702)451-0774
12/30/2015 NRB/NRB 12/30/2015 RAR/NRB CENTENNIAL OB/GYN	28 ORIG	0.00	24.51	12/30/2015 1	153647735490002999	02999 NVMED



Walgreen Co.
1901 E. Voorhees Street
DANVILLE, IL 61834
P 217-554-8949 F 217-554-8955
Walgreens.com

12/30/2020

NEVADA STATE BOARD OF MEDICAL EXAMINERS ATTN: SR INV KIM FRIEDMAN, CMBI 6010 S RAINBOW BLVD, BLDG A STE 2 LAS VEGAS, NV, 89118-0000

Certification of Records

PATIENT: AKA: Requested D Reference / 0	ate Range: 01/01/2009 To 12/28/2020
•	ase #: 255323
√	Attached you will find 2 page(s) of Walgreen Co. requested records relating to the patient mentioned above to be true and accurate. Attached you will find 0 page(s) of requested records relating to the patient mentioned above from .
	Certification of No Records
	We do NOT have Walgreen Co. records relating to the patient mentioned above with the information provided; or there are no records for the dates requested; or the records requested are older than 11 years, the required retention policy.
	We Do NOT have records relating to the patient mentioned above.
By signing, I	confirm that the above to be a true and accurate statement.
12/30/2020	Jul Bosch
	Jill Bosch
	Print

EXHIBIT 3

EXHIBIT 3

Vida Spa 3225 S Rainbow Blvd, #107 Las Vegas, NV 89146 702-202-3050

OPERATIVE REPORT

PATIENT NAME:

DOB

DATE: October 9, 2019

PREOPERATIVE DIAGNOSIS: Lipodystrophy ICD10 E88.1

POSTOPERATIVE DIAGNOSIS: Same

PROCEDURE: Liposuction, arms

SURGEON: Tammy Hankins, P.A.-C. D. Washington

ANESTHESIA: Lidocaine with I:100,000 epinephrine

TUMESCENT: 1000ML NS with 50cc Lidocaine 2% with epi 1:100,000

BLOOD LOSS: less than 50cc.

VOLUME REMOVED: 800cc total, 500cc adipose, 300cc serosanguinous fluid

This 31year-old female demonstrates conditions described above of excess and redundant adipose tissue in large deposits of upper arms and has requested surgical correction. The procedure, alternatives, risks and limitations in this individual case have been very carefully discussed with the patient. All questions have been thoroughly answered, and the patient understands the surgery indicated. She has requested this corrective repair be undertaken, and consent was signed.

The patient ambulated to the operative suite. While standing, the excess and redundant upper inner arm adipose tissue was carefully measured, and marked.

The patient was placed on the table in prone position. Bilateral upper arms, anterior medial axillary areas were prepped with betadine solution paint, and the patient was draped in the usual sterile manner. 1% Lidocaine with 1:100,000 Epinephrine for anesthesia and vasoconstriction was injected into superficial dermis at incision sites. The surgical incision,4mm via #11 scalpel were symmetrical bilaterally: medial elbow, medial supra-axillary crease, and medial infra axillary, with no blood loss.

The abdomen was infused with 1L of tumescent fluid, 1000ML NS with 50cc Lidocaine 2% with epi 1:100,000, via 14G 30cannula.

After waiting a period of approximately twenty minutes for adequate vasoconstriction, the Vaser liposuction was started.

The previously outlined areas were re-identified and treated with Vaser high frequency ultrasound release via 3mm Vaser probe, and then standard cannula liposuction lipoplasty with the Vaser machine and instruments. A 3.7mm liposuction cannula was used. Approximately 400cc of serosanguinous adipose tissue was removed from each side. The patient tolerated the procedure well.

At the end of the operation the patient's wounds were reexamined for hemostasis, and no hematomas were noted. Patient remained stable, and alert and oriented x3 throughout procedure. The patient had nice contour and results appeared to be symmetrical. Sterile Gauze with antibiotic ointment were places over all incisions, and compression gauze over those bilaterally, with external compression garment placed to remain until follow up the next day.

The procedures were completed without complication and tolerated well with minimal blood loss. The patient was released ambulating to the company of her husband to return home in satisfactory condition. A follow-up appointment was scheduled for the next day, routine post-op medications prescribed, and post-op instructions given to the patient and other responsible party.

Tammy Hankins P.A.-C

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www.transformation

Patient Information Patient Name: 7 Phone: Address: ____ Emergency Contact: Weight: 46 kg loo lbs Height: 555 BMI Age: 46 (DOB)Gender: Allergies Reaction: Medication:___ Medication: Reaction: Medication: ____Reaction: Medication Dose Frequency Medication Dose Frequency 19- Micix 7.517=3 CAICOCLONE Social History: Occupation: Decues Marital Status: Osingle Married Opivorced Owidowed Tobacco Use: No O Yes (If yes, # of packs/day _____ # years ____) Caffeine Use: No O Yes (If yes, check all that apply: Coffee Tea____) Alcoholic beverage consumption: No Yes (If yes, how much and often Social, 2/ pronting Surgical History: ☐ Appendectomy ☐ Cholecystectomy ☐ Thyroidectomy ☐ Hemorrhoidectomy ☐ Mammogram ☐ Hysterectomy ☐ Breast Surgery ☐ Tubal litigation ☐ Colonoscopy ☐ Hernia Repair (location/type) ______ ☐ Other: Gall bladder removed Family History: Has anyone in your family had any of the following conditions? (Check if yes, and indicate relationship to you) ☐ Cancer/Polyps ☐ Anemia_ ☐ High Blood Pressure Anesthesia Reaction Nauscal, Car Miliha, Colon, Rectum, Anal, Stomach, Breast, Diabetes

☐ Blood Clots_

☐ Stroke

☐ Heart Disease ____

Prostate, Uterus, Ovaries, Thyroid, Lung,

Blood, Lymphoma

Other

☐ Bleeding Problems

☐ Hepatitis____

Other



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Digestive: Nothing in this group	Neurological: Nothing in this group
☐ Loss of appetite	☐ Frequent headaches
☐ Difficulty swallowing	☐ Migraines
☐ Early satiety (fill up easy)	☐ Weakness
☐ Heartburn	☐ Seizures
☐ Nausea	☐ Stroke
☐ Vomiting	☐ Paralysis
☐ Diarrhea	☐ Decreased sensation
Constipation	☐ Difficulty with speech
☐ Blood in stool	☐ Dizziness
☐ Dark, tarry stools	
☐ Abdominal pain	Psychlatric: Nothing in this group
Painful bowel movements	☐ Anxiety
☐ Poor control of BMs, urgency	Depression
Ŧ	☐ Mood swings
Urinary: Nothing in this group	☐ Phobias, fears
Burning with urination	Panic attacks
☐ Weak urine stream	☐ Suicide thoughts or attempts
☐ Blood in urine	
☐ Gas or stool in urine	Endocrine: Nothing in this group
☐ Poor control, leakage of urine	☐ Heat or cold intolerance
Kidney stones	☐ Excessive thirst
Prostate problems	Excessive urination
☐ Testicular mass	☐ Excessive Sweating
Get up at night to urinate - Number of times per night	
Gynecologic (female): ☐ Nothing in this group	Hematologic, Lymphatic: Nothing in this group
☐ Irregular periods - Last period:	☐ Prior blood transfusion
Abnormal vaginal discharge	☐ Easy bleeding or bruising
	Low red blood cell count (anemia)
Breast: Nothing in this group	Low white blood cell count
☐ Breast lump	☐ Prolonged bleeding with cuts, surgery
☐ Breast pain	Swollen glands
☐ Nipple discharge	☐ Blood clots
	☐ Use of blood thinners
Skin: Nothing in this group	Swollen lymph nodes
Rash	
Skin Infections	Allergic, immunologic: Nothing in this group
Ulcers or sores	☐ HIV infection
☐ Yellowing of the skin	☐ Hepatitis
Eczema, psoriasis, other	☐ Imune deficiency
Pyoderma gangrenosum, erythema nodosum	☐ Antibiotics needed for dental work



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DO YOU BRUISE OR BLEED EASILY? YES (NO.) (WIT	H CUTS / TOOTH EXTRACTIONS / PREGNANCY / SURGERY)
E) PLAIN	in color routh Extended regolder ()
DO YOU HAVE A FAMILY HISTORY OF BLEEDING PROBLEMS?	EYPLAIN (N.C.)
DIFEICULTIES WEEK EOCAT OR GENERAL AND STHE	
,	
EIPLAIN GENERALL - MOLLIET	Constructor
HAVE YOU EVERHAD ABLOOD TRANSEUSION?	YES (NO
Company of the Compan	
ARE YOU PREGNAND?	YES (NO
HIVE YOU EVERHAD HAVE OR BEEN EXPOSED TO	THE COLUMN TO THE PROPERTY OF THE PARTY OF T
YIII NO INTRAVENOUS DRUGS	YES (NO HEPATITIS
YES (NO INFECTIOUS DISEASES	YES NO HIV / AIDS
YIII NO TB FYES TO ANY EXPLAIN	YES NO LIVER TRANSPLANT
Review of Systems: Do you surrent	to begin and of the fall of
General: Nothing in this group	y have any of the following symptoms or conditions (Check if yes)
☐ Weight loss – How muchlbs	Cardiovascular: Nothing in this group
Loss of Appetite	Chest pain
☐ Fever	Palpitations
Chillis	Heart valve problems
☐ Night Sweats	☐ Calf pain with walking
☐ Fainting Spells	☐ Leg swelling
	Respiratory: Nothing in this group
Eyes: Nothing in this group	Chronic cough
Eye disease or injury	
Wear glasses or contacts	Coughing up blood
☐ Blurred or double vision	Short of breath with activity
Ear, Nose, Mouth, Throat: Nothing in the	Short of breath lying flat
☐ Hearing loss	☐ Wheezing
☐ Ear ache / Infection	
☐ Ringing in ears	☐ Bronchitis
☐ Nose Bleeds	☐ Pneumonia
☐ Bleeding gums	Musculoskeletal: Nothing in this group
☐ Mouth sores	☑ Joint pain
☐ Sore throat	rthritis
☐ Recent voice change	☐ Back pain
Runny nose / cold	☐ Muscle weakness
Sinus problems	☐ Leg pain with walking
□ Neck stiffness / pain	Leg pain at rest
☐ Enlarged neck glands / masses	☐ Broken bones
i — i a - i - ii Biariaa / iii Boood	1



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Patient Profile	,		<u> </u>	_			
Name:				Date:			
Address:				City:	Vege	S	
State:	Zip: _			Home Phone:			
Work Phone:				Cell Phone:			
Age: 43	DOB:			Preferred Con	tact#		
Occupation:	bale.	6 (c	asire)	Employer:			
SSN:			_	Driver's Licen	ise: _		
Email:							
Medical Question	naire			_			
Medical History			(Please circle yes	orno)			
Diabetes High Blood Presso Heart Attack Heart Disease Multiple Sclerosis Epilepsy Hepatitis Bowel Problems Prostate Cancer Sexually Transmi Blood Transfusion Tuberculosis Other Current medicatio	tted n 	Yes	No (No (No No N	High Choleste Coronary Hea Blocked Arter Stroke/TIA Parkinson's di Liver Disease Kidney Disease Prostate Disea Peyronie's Dis HIV Infection Major Depress Bleeding Diso	isease se (BPH) sease l/AIDS sion rder	Yes	No N
-ty2110	上方大	Ch	4.0.1011-	Vittella.	in 13	<u>C.</u>	
Surgery Heart	Yes	No	Blocked	l Artery	Yes	No `	
Prostate	Yes	No	Penis		Yes	No	
	Yes	No	Bladder		Yes	No	
	Yes Yes	No No	Vasecto Spine	my	Yes	No	
Other	1 62	110			Yes	No	
Previous Urology	Proble	ms_					
Kidneys (Yes	No	Penis		Yes	No	
Bladder		No	Testicle	S	Yes	No .	
Prostate	Yes	(No	Urine		Yes	No	
<u>Injuries</u> Head	Yes	No	Back		Yes	No	



1-44-1 5750

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Pelvis Other	Yęs	No	Penis		Yes No	
History of Rec Alcohol? Smoking? Recreational D	No	Yes	How Often? How Much? caine, Meth, etc?	tille In	OW Often?	
Family History Diabetes Cancer of the F		Yes Yes		ture Heart Attack Blood Pressure		
Social History: Marital Status:	Single		Dïvorced Se			
Physical Activi Allergies Have you ever			e Light Mo		No	
lfyes, please p	rovide det	ails:	······································			
Please provide	your curre	ent physic Name	ians:	Phone	Specialty	Last Visit
Family Physici	an				03540	9/15/19
Specia list Specia list					0.0, 7/0	
		Age: <u>લ</u>	IISTORY FOF Date: Chief Compli	10/1/19	Referring [Doctor:
Vital Signs: Wt:	Temp: _		_ HR:	BP:	RR:	Ht:
Medication [Dose Fre	allency	Social History	r: Occupation:		ation Dose Frequency
Marital Statu # y	ıs: Singl ears verage (e Marrie) (consump	d Divorced Wi Caffeine Use: I otion: No Yes	idowed Tobaco No Yes (If yes, (If yes, how mu	o Use: No Yes check all that uch and	s (If yes, # of packs/day apply: Coffee Tea Soda)



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Anxiety Depression Asthma GERD Cancer Other:	
History: Appendectomy Cholecystectomy Thyroidectomy Hemorrhoidectomy Mammog Hysterectomy Breast Surgery Tubal litigation Colonoscopy Hernia Repair (location/type	
Other:	
Family History: Please describe any additional problem/concerns which you Physician should be made aware of:	think the
Diabetes Heart Disease HTN Cancer Other Mother Father Sister Brother Grandfather Grandmother Aunt Uncle	



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VASER LIPO INFORMED CONSENT FORM

This is an informed-consent document that has been prepared to help educate you on the VASER Lipo procedure, its risks, and alternative treatment.

It is important that you read this information carefully and completely. Please initial each page, indicating that you have read the page, and sign the Consent for Surgery as proposed by your surgeon.

VASER Lipo is a surgical technique to remove unwanted deposits of fat from specific areas of the body, including the face and neck, upper arms, upper and lower back, abdomen, buttocks, hips, inner and outer thighs, knees, calves, and ankles. This is not a substitute for weight reduction, but a method for removing localized deposits of fatty tissue. VASER Lipo may be performed as a primary procedure for body contouring or may be combined with other surgical techniques.

The best candidates for VASER Lipo are individuals of relatively normal weight who have excess fat in particular body areas. Having firm, elastic skin will result in a better final contour after lipoplasty. Skin that has diminished tone due to stretch marks, weight loss, or natural aging will not reshape itself to the new contours and may require additional surgical techniques to remove and tighten excess skin. Body-contour irregularities due to structures other than fat cannot be improved by this technique. Lipoplasty itself will not improve areas of dimpled skin known as "cellulite".

The VASER Lipo procedure is performed utilizing advanced proprietary technology. A patented grooved solid metal probe is first inserted through one or more small skin incisions. Ultrasonic energy emitted from the sides and end of the probe as it is passed back and forth breaks down fatty deposits. A hollow metal surgical instrument known as a cannula is then inserted and is directed through the area of emulsified fat cells. The cannula is attached to a vacuum source, which provides gentle suction to remove the emulsified fat. Because the VASER Lipo procedure is unique in that it first targets and dissolves fat cells and then draws out emulsified fat, leaving the collagen matrix intact, surgical trauma, complications and the potential for post-operative pain and bruising are minimized while skin retraction is optimal.

VASER Lipo may be performed under local or general anesthesia and requires the infiltration of fluid containing dilute local anesthetic and epinephrine into areas of fatty deposits. This technique can reduce discomfort at the time of surgery, as well as reduce post-operative bruising.

Support garments and dressings are worn after surgery to control potential swelling and promote healing, to provide comfort and support, and to help skin better fit new body contours. Your surgeon may recommend that you make arrangements to donate a unit of your own blood that would be used if a blood transfusion were necessary after surgery.

ALTERNATIVE TREATMENT

Alternative forms of management include not treating the areas of fatty deposits, and diet and exercise regimens that may be of benefit in the overall reduction of excess body fat. Direct removal of excess skin and fatty tissue may be necessary in addition to lipoplasty in some patients. Risks and potential complications are associated with alternative forms of treatment that involve surgery.

		<i>*</i> •	
Patient	Initials:		



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RISKS AND SIDE EFFECTS

Every surgical procedure involves a certain amount of risk, and it is important that you understand the risks involved with the VASER Lipo procedure. An individual's choice to undergo a surgical procedure is based on the comparison of the risk to potential benefit. Although the majority of patients do not experience these complications, you should discuss each of them with your surgeon to make sure you understand the risks, potential complications, and consequences of VASER Lipo.

Patient Selection: Individuals with poor skin tone, medical problems, or unrealistic expectations may not be candidates for VASER Lipo.

Allergic Reactions: Rarely, local allergies to tape, suture material, or topical preparations utilized in hipoplasty procedures have been reported. More serious systemic reactions due to drugs administered during surgery and prescription medicines may require additional treatment.

Asymmetry: Due to factors such as skin tone, bony prominence, and muscle tone, which can contribute to normal asymmetry in body features, it may not be possible to achieve symmetrical body appearance through lipoplasty procedures.

Bleeding: While unusual, it is possible to have a bleeding episode during or after surgery. Should post-operative bleeding occur, it may require emergency treatment to drain accumulated blood or require a blood transfusion. Non-prescription herbs and dietary supplements can increase the risk of surgical bleeding. Do not take any aspirin or anti-inflammatory medications for 2 weeks before surgery, as this may increase the risk of bleeding. Please review our Medication Alert for products and ingredients to be avoided for 2 weeks prior to and 2 weeks following your scheduled VASER Lipo procedure, and consult your doctor before taking anything.

Change in Skin and Skin Sensation: A temporary decrease in skin sensation may occur following VASER Lipo. This usually resolves over a period of time. Diminished or complete loss of skin sensation that does not totally resolve could potentially occur, as it infrequently has with various lipoplasty procedures.

Chronic Pain: Chronic pain and discomfort following VASER Lipo is unusual, but possible.

Infection: Infection is uncommon following this type of surgery. Should an infection occur, treatment with antibiotics or additional surgery may be necessary. Although extremely rare, life-threatening infections such as toxic shock syndrome could occur after lipoplasty surgery, regardless of the technology utilized.

Pulmonary and Systemic Complications: In extremely rare cases, fat droplets could become trapped in the lungs to create a possibly fatal complication called fat embolism syndrome. Pulmonary complications may occur secondarily to blood clots (pulmonary emboli) or partial collapse of the lungs after general anesthesia. Should either of these complications occur, you may require hospitalization and additional treatment. In some circumstances, pulmonary emboli can be life-threatening or fatal.

Long-term Effects: Subsequent alterations in body contour may occur as a result of aging, weight loss or gain, pregnancy, or other circumstances not related to VASER Lipo.

Patient Initials: <u>UC</u>



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Scarring: Although the incisions created for VASER Lipo are minimal and good wound healing after a surgical procedure is expected, abnormal scars may occur within the skin and deeper tissues in rare cases. Such scars may be unattractive and of a different color than the surrounding skin. Additional treatments, including surgery, may be necessary to treat abnormal scarring.

Seroma: While VASER Lipo has reduced the incidence and severity of seromas associated with lipoplasty procedures, such fluid accumulation is possible and could require additional treatments or surgery to promote drainage.

Bruising and/or Swelling: Although VASER Lipo typically reduces or eliminates bruising and swelling normally resulting from lipoplasty procedures, bruising and swelling may occur and, in rare situations, persist for extended periods of time.

Skin Contour Irregularities: Since VASER Lipo selectively targets fat cells, leaving other essential tissues intact, skin contour irregularities and depressions in the skin are unlikely but possible. Visible and palpable wrinkling of skin can occur, particularly when large quantities of fat cells are removed and/or the skin is lacking good elasticity. Post-operative skin contour irregularities could necessitate additional treatments including surgery.

Skin Loss: Additional treatments including surgery could be necessary in the unlikely event that skin loss occurs following your VASER Lipo treatment.

Surgical Anesthesia: All forms of surgical anesthesia or sedation, whether administered locally or generally, carry risks including the possibility of complications, injury, and even death. You will probably be required to sign a separate anesthesia consent form in preparation for your surgery.

Surgical Shock: VASER Lipo could conceivably cause severe trauma, particularly when multiple or extensive areas are treated in a single session. Although serious complications are a rarity, infections or excessive fluid loss can lead to severe illness and even death. Should surgical shock occur following your VASER Lipo treatment, hospitalization and additional treatment would be necessary. Individuals undergoing VASER Lipo procedures to remove large volumes of fat are at a greater risk of complications. Patients contemplating large-volume lipoplasty (greater than 5000 cc removed) may be advised to undergo post-operative monitoring and aftercare that involves overnight hospitalization.

Lidocaine Toxicity: There is the possibility that large volumes of fluid containing dilute local anesthetic drugs and epinephrine that is injected into fatty deposits during surgery may contribute to fluid overload or systemic reaction to these medications. Additional treatment including hospitalization may be necessary.

Ultrasonic Technology: Risks associated with the use of ultrasound in lipoplasty treatments include the aforementioned and the following specific risks:

Burns: Ultrasonic energy may produce burns and tissue damage if the probe touches the undersurface of the skin for prolonged periods of time. If burns occur, additional treatment and surgery may be necessary.

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Probe Fragmentation: Ultrasonic energy produced within the probe(s) may cause disintegration /fragmentation) of the surgical instrument. The occurrence and effect of this is unpredictable. If this should occur, additional treatment including surgery may be necessary.

Unknown Risks: The long term effect on tissue and organs of exposure to short-duration, high-intensity ultrasonic energy is unknown. The possibility exists that additional risk factors resulting from the use of ultrasound in VASER Lipo could potentially be discovered.

Other: While we have attempted to assist you in building realistic expectations for your VASER Lipo treatment, you may be disappointed with your surgical results. However infrequent, it may be necessary in your case to perform additional surgery to improve results.

ADDITIONAL SURGERY NECESSARY

There are many variable conditions in addition to risk and potential surgical complications that may influence the long term result of VASER Lipo. Even though risks and complications are unusual, the risks cited previously are particularly associated with lipoplasty procedures utilizing suction and/or ultrasound technologies. Other complications and risks can occur but are even more uncommon. If complications should occur, additional surgery or other treatments may be necessary. The practice of medicine is not an exact science. Although good results are expected, there is no guarantee or warranty expressed or implied on the results that may be obtained.

FINANCIAL RESPONSIBILITIES

The cost of surgery involves several charges for the services provided. The total includes fees charged by *your* doctor, the cost of surgical supplies, anesthesia, laboratory tests, and possible outpatient hospital Charges, depending upon where the surgery is performed. Due to the proprietary nature and expense of the technology utilized, your bill may reflect a separate and additional fee for the use of VASER equipment specific to your procedure. Based upon whether the cost of surgery is covered by an insurance plan, you will *be* responsible for necessary copayments, deductibles, and charges not covered. As an elective, cosmetic procedure, VASER Lipo is not typically covered by insurance, placing full responsibility for payment upon the patient. You may incur additional costs should complications develop from the surgery. Secondary surgery or hospital day-surgery charges incurred due to remedial surgery are also the responsibility of the patient.

Patient Initials: ()



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DISCLAIMER

Informed-consent documents are used to communicate information about the proposed surgical treatment of a disease or condition along with disclosure of risks and alternative forms of treatment(s). The informed consent process attempts to define principles of risk disclosure that should generally meet the needs of most patients in most circumstances.

However, informed consent documents should not be considered all inclusive in defining other methods of care and risks encountered. Your surgeon may provide you with additional or different information that is based on all the facts in your particular case and the state of medical knowledge.

Informed-consent documents are not intended to define or serve as the standard of medical care. Standards of medical care are determined on the basis of all of the facts involved in an individual case and are subject to change as scientific knowledge and technology advance and as practice patterns evolve. It is important that you read the above information carefully and have all of your questions answered before signing the the next page.

Patient Initials:



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I have received and read the information: VASER® Lipo Informed Consent

I understand that VASER Lipo is an elective surgery procedure to remove body fat from specific area(s) of the body.

The procedure has been explained to me in a way that I understand. I have had the opportunity to ask questions, and my questions have been answered. Alternative methods of treatment have been discussed with me.

I acknowledge that no guarantee has been given by anyone as to the results that I may obtain. Although a good result is expected, I understand that there are risks to the procedure or treatment proposed, as detailed in the preceding information pages.

consent to the administration of such anesthetics considered necessary or advisable. I understand that all forms of anesthesia involve risk and the possibility of complications, injury, and sometimes death.

For purposes of advancing medical education, I consent to the admittance of observers to the operating room.

I consent to the disposal of any tissue, medical devices or body parts which may be removed.

l authorize the release of my Social Security number to appropriate agencies for legal reporting and medical device registration, if applicable.

Having discussed the reasonable expectations of the VASER Lipo procedure with me and answered all of my questions to my satisfaction, I hereby authorize and such assistants as may be selected to perform VASER Lipo and any other procedure(s) that in their judgment may be necessary or advisable should unforeseen circumstances arise during surgery.

With my signature below I hereby consent to having VASER Lipo and to the above.

. . / :

Please rewrite in your own handwriting: "I understand that the practice of medicine is not an exact science and although good results are expected, there can be no guarantee as to the results."

Patient Signature _	ull	Date	10/8/10	

Patient Initials:

6



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NSBME 0089

I certify that I, and/or a member of Vida Spa staff, have discussed all of the above with the patient and answered all questions regarding the VASER Lipo procedure. I believe the patient fully understands and all questions have been answered.

Clinician Signature	Date
I am a smoker of tobacco: I understand that tobacco smoking incremot possible, to drastically reduce the amweeks after my surgery.	eases health risks. Doctor and staff have advised me to stop smoking and, if that is nount of my smoking, and to discontinue all smoking for two weeks before and two
It has been explained to me that there is this can cause a delay in wound healing	decreased circulation secondary to smoking of tobacco and/or marijuana and that as well as skin breakdown, skin loss and scarring.
As a smoker, I understand that the surge these complications, which may still occ	ery will have to be more conservative and less aggressive than usual to try to avoid cur, despite the doctor's best efforts to avoid them.
This has been fully explained to me and smoking habits.	I relieve Vida Spa from any responsibility related to the increased risks from my
Patient Signature	Date
I am a non-smoker of tobacco: Patient Signature	
I do not use social drugs.	
Patient Signature	
Patient name (please print):	.) —
DOB: _	
Requested By:	
Patient Initials: UC	7



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I, the above-named patient, hereby consent that photographs, videotape, and/or computer imaging may be taken of me or of parts of my body under the following conditions:

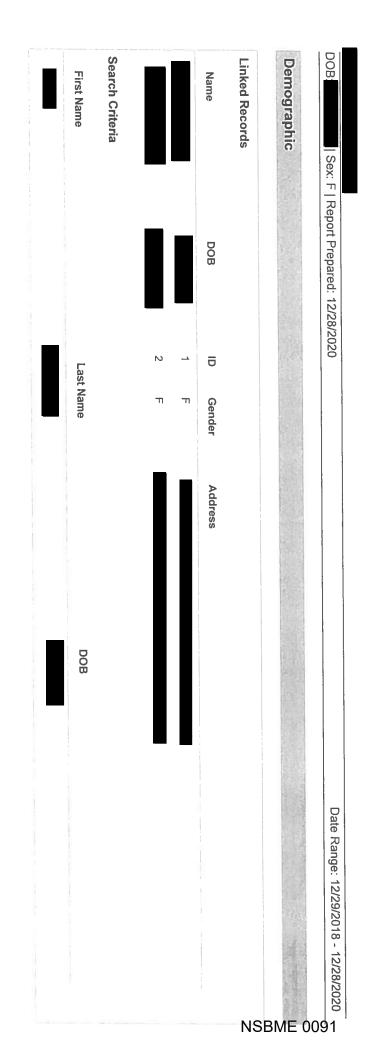
Pre- and post-operative photographs will be taken of my treatment for record purposes. The photographs will be taken by my physician or a photographer approved by my physician. I understand that these photographs will be the property of the attending physician and Vida Spa.

I understand that all computer imaging viewed is only a representation of the result that could be achieved through this procedure and that imaging is used as an educational tool to benefit the patient without guarantee of any result.

I have had the opportunity to discuss this consent with my surgeon and agree that all of my questions have been answered. This authorization is granted in furtherance of medical education and other good and valuable consideration and as a voluntary contribution. I hereby waive all rights I might have to photographs, videotape, and computer images and do hereby release, discharge, and save harmless Vida Spa and their employees and agents from all claims and liabilities whatsoever in law and in equity arising from such use.

I have read and fully understand and consent to all the above items contained in this form.

Patient Signature	2 12/8/10
Patient Signature _	Date _/(2/3/15/



Risk Indicators

NARXCARE SCORES

OVERDOSE RISK SCORE

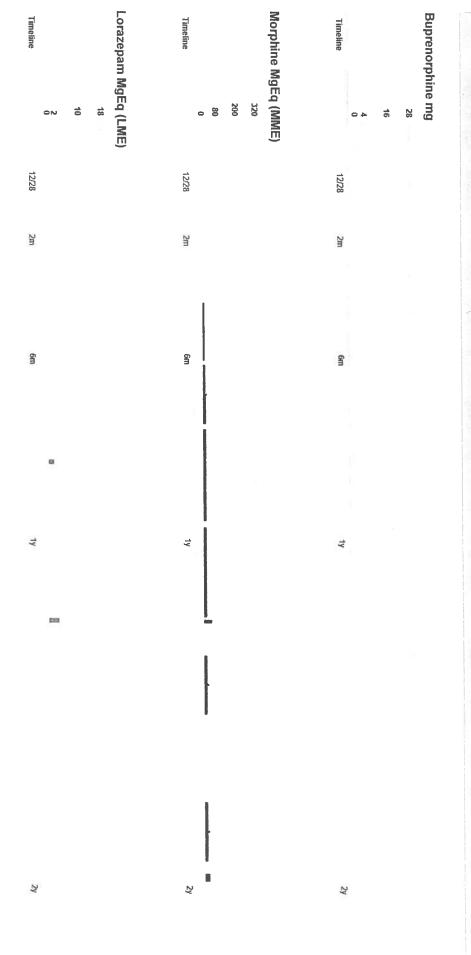
Narcotic Sedative Stimulant 220 120 010

(Range 000-999)

refusing to provide medications. The information on this report is not warranted as accurate or complete. or the prescriber. NarxCare scores and reports are intended to aid, not replace, medical decision making. None of the information presented should be used as sole justification for providing or This NarxCare report is based on search criteria supplied and the data entered by the dispensing pharmacy. For more information about any prescription, please contact the dispensing pharmacy

ADDITIONAL RISK INDICATORS (0)

overdose risk in the same dose-dependent manner as doses for full agonist opioids. MME = morphine milligram equivalents. LME = Lorazepam milligram equivalents. MG = dose in milligrams. thresholds meant for opioids prescribed for pain. Buprenorphine products have no agreed upon morphine equivalency, and as partial opioid agonists, are not expected to be associated with *Per CDC guidance, the MME conversion factors prescribed or provided as part of the medication-assisted treatment for opioid use disorder should not be used to benchmark against dosage



Summary Summary

Page 5 of

01/22/2019	02/11/2019	03/12/2019	04/03/2019	07/09/2019	08/07/2019	10/09/2019	Fill Date
2	Ν	N	-	Ν	N	N	ō
01/08/2019	02/11/2019	03/11/2019	04/03/2019	07/09/2019	08/06/2019	10/09/2019	Written
01/22/2019	02/12/2019	03/13/2019	04/03/2019	07/09/2019	08/15/2019	10/09/2019	Sold
Oxycodon-Acetaminophen 7.5-325	Oxycodon-Acetaminophen 7.5-325 M546	Oxycodon-Acetaminophen 7.5-325 8 M546	Phentermine 37.5 Mg Tablet	Oxycodon-Acetaminophen 7.5-325 M M546	Oxycodon-Acetaminophen 7.5-325 M546	Tramadol Hcl 50 Mg Tablet 8 E881	Drug
14.00	30.00	30.00	21.00	30.00	30.00	24.00	Qty
7	30	30	2	30	30	ယ	Days
Mi Eas	Mi Eas	Mi Eas	Mi Jor	Mi Eas	Mi Eas	Sh Was	Prescriber
1782457	1795229	1813435	133870	1884442	1899632	1937054	Rx #
Wal (8832)	Wal (8832)	Wal (8832)	Jor (0167)	Wal (8832)	Wal (8832)	Wal (8832) 0/0	Pharmacy
0/0	0/0	0/0	0/0	0/0	0/0	0/0	Refill
22.50 MME	11.25 MME	11.25 MME		11.25 MME	11.25 MME	40.00 MME	Daily Dose *
Comm Ins	Comm Ins	Comm Ins	Private Pay	Comm Ins	Comm Ins	Comm Ins	Pymt Type
Z	Ş	Z	Š	Z	Z	Z	PMP

Prescribers

Name	Address	City	State	Zipcode	Phone
Michele R Jordan	2650 Lake Sahara Dr Ste 100	Las Vegas	N	89117-3451	(702) 822-7400
Sherman Washington, Jr	1409 E Lake Mead Blvd	North Las Vegas	N N	89030-7120	(702) 202-3050
Brian Parker	10080 Alta Dr Ste 120	Las Vegas	N	89145	(702) 240-9500
Michael Jay Eastman	9920 W Cheyenne Ave Ste 110	Las Vegas	Z	89129	(702) 316-2281

Pharmacies

Jordan, Michele R (0167)	Name
2650 Lake Sahara Dr Ste 100	Address
Las Vegas	City
N	State
89117-3451	Zipcode
(702) 822-7400	Phone
) 2650 Lake Sahara Dr Ste 100 Las Vegas NV 89117-3451

Disclaimer

Report contents are based on data entered by dispensers and their staff, and may contain errors. The Board of Pharmacy recommends independent verification with dispensers when prudent or necessary. Willful disclosure of prescription information may be subject to disciplinary action, civil penalties or criminal action.

Report Prepared: 12/28/2020

Report Criteria

Patient History Results

775-687-5694

Date Range: 10/01/2019 - 12/28/2020

			Patie	Patient History			
Patient Last Name	Patient First Name	Patient DOB	Requestor Last Name	Requestor First Name	User Role	Date -	Requestor Source
			Friedman	Kim	Licensing Board Investigator	12/28/2020 11:27 AM	AWARxE
			Mansy	Medhat	Pharmacist	12/15/2020 02:17 PM	AWARXE
			Friedman	Kim	Licensing Board Investigator	12/15/2020 02:17 PM	AWARxE
			Mansy	Medhat	Pharmacist	12/15/2020 02:10 PM	AWARxE
			Friedman	Kim	Licensing Board Investigator	12/15/2020 01:42 PM	AWARXE
			EASTMAN	MICHAEL	Physician Assistant	12/09/2020 01:36 PM	AWARxE
			Washington	Sherman	Physician (MD, DO)	11/16/2020 12:39 PM	AWARxE
			Friedman	Kim	Licensing Board Investigator	10/27/2020 01:08 PM	AWARxE
			EASTMAN	MICHAEL	Physician Assistant	08/31/2020 12:13 PM	AWARXE
			EASTMAN	MICHAEL	Physician Assistant	07/28/2020 11:28 AM	AWARxE
			EASTMAN	MICHAEL	Physician Assistant	06/30/2020 11:05 AM	AWARXE
			EASTMAN	MICHAEL	Physician Assistant	05/26/2020 02:40 PM	AWARXE
			EASTMAN	MICHAEL	Physician Assistant	04/27/2020 10:12 AM	AWARxE
			EASTMAN	MICHAEL	Physician Assistant	03/24/2020 01:05 PM	AWARXE
			EASTMAN	MICHAEL	Physician Assistant	03/16/2020 10:55 AM	AWARxE
			EASTMAN	MICHAEL	Physician Assistant	02/17/2020 04:13 PM	AWARxE
					Dr. Control of the Co	01/20/2020 04:34 PM	AWARxE

AWARXE	10/09/2019 02:55 PM AWARXE	Prescriber Delegate - Unlicensed	Sara	Robinson			
AWARXE	11/12/2019 03:52 PM	Physician Assistant	MICHAEL	EASTMAN			
AWARXE	12/09/2019 04:37 PM AWARXE	Physician Assistant	MICHAEL	EASTMAN			
		0000	nequesion maintaine	Requestor Last Maille	Patient DOB	Patient First Name	Patient Last Name
▼ Requestor Source	Date	liser Role	Dominactor Eiret Name	D. Home		ROUSE PROPERTY OF THE PERSON O	

Disclaimer:

investigator. I understand and agree that by proceeding beyond this page and accessing this Prescription Monitoring Program (PMP) system, I certify that I am active healthcare

I understand that my use of this PMP system is permitted only in connection with obtaining information for an open investigation, and certify that I am accessing the PMP system for such a purpose.

I understand that the information in the PMP system is confidential pursuant to NRS 453.1545. I must treat the information as confidential, just as I would protect any other health care information. I will protect any PMP information in my possession in accordance with federal and state laws governing health care information.

I understand that my access to, or disclosure of, any PMP data for any purpose other than obtaining information for an open investigation may subject me to disciplinary action, civil penalties or criminal action.

I understand that I am responsible for all use of my username and password. I will never share my password with anyone, including my co-workers and staff. If my authentication or password is lost or comprised, I agree to notify the PMP immediately.

I understand the PMP administrator will conduct auditing activities to monitor for unusual or potentially unauthorized use of the system.

Page

15

\$ 8.16

3.74

CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

DATE PRINTED: 12/18/2020

INSURANCE PROFILE

12/15/2018 through 12/15/2020

Patient Phone:

REACHED.

UNTIL GONE

TRIGEN

13811- RX

0719-10

1927141-7841 NITROFURANTOI TAKE 1 CAPSULE BY MOUTH TWICE DAILY

N MONO/MAC 100MG CAPS

Allergy Conditions: None on file Health None on file

Total

WILLIAMS,

JENNIFER

Date of Birth: Gender: F Rx-Store Medication Instructions Drug Mfr NDC Class Days Entered Fill FIII RPH Pbr Name DEA# Pbr Phone Plan **Cust Amt** Qty Supply Date Nhr QVAR REDIHALER INHALE 1 PUFF BY 678114-11766 TEVA 59310-RX 30 07/29/2020 10 HHM NORRIS, KYRA BN9595832 (702)984-UHCRX 15.00 BOMCG ORALINH MOUTH TWICE DAILY 0304-80 5200 (120)Total 1 Subtotal: \$ 15.00 10 1899632-7841 OXYCODONE/ACE TAKE 1 TABLET BY MALLINCKR 00406-C2 30 08/06/2019 30 EASTMAN, ME0221452 (702)316-UHCRX 15.00 TAMINOPHN 7.5-MOUTH EVERY 24 0522-01 ODT MICHAEL 2281 325MG TB HOURS AS NEEDED Total Subtotal: 30 \$ 15.00 1899839-7841 TOPIRAMATE TAKE 1 TABLET BY ZYDUS 68382-EASTMAN. RX 30 08/06/2019 109 ME0221452 (702)316-UHCRX 8.16 25MG TABLETS MOUTH EVERY NIGHT AT BEDTIME AS 0138-05 MICHAEL 2281 DIRECTED, INCREASE BY 25 MG EVERY 7 DAYS UNTIL A DOSE OF 200 MG IS

09/23/2019

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> > CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

109

UHCRX

Subtotal:

(702)877-

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CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

DATE PRINTED 12/18/2020

INSURANCE PROFILE

12/15/2018 through 12/15/2020

Patient Pho		Gender: F									Allergy Condition Health		on file on file		
Rx-Store	Medication	Instructions	Drug Mfr	NDC	Class	Days Supply	Entered Date		Fill Nbr	RPH	Pbr Name	DEA#	Pbr Phon	e Plan	Cust Amt
										T	otal	1 Subto	tal:	14	\$ 3.74
1937054-7841	TRAMADOL 50MG TABLETS	TAKE 1 TO 2 TABLETS BY MOUTH EVERY 6 HOURS AS NEEDED FOR PAIN	AMNEAL	65162- 0627-11	C4	3	10/09/2019	24		DCC	WASHINGTON, SHERMAN	, BW1079032	(702)202- 3050	UHCRX	2.75
										Ŧ	otal	1 Subto	tal:	24	\$ 2.75
1937055-7841	DIAZEPAM 10MG TABLETS	TAKE 1 TABLET BY MOUTH EVERY 8 HOURS AS NEEDED	TEVA	00172- 3927-70		4	10/09/2019	12		DCC	WASHINGTON SHERMAN	, BW1079032	(702)202- 3050	UHCRX	1.73
										Ŧ	otal	1 Subto	tal:	12	\$ 1.73
1937056-7841	PROMETHAZINE 25MG TABLETS	TAKE 1 TABLET BY MOUTH EVERY 6 HOURS AS NEEDED FOR NAUSEA	KVK TECH	10702- 0003-50		5	10/09/2019	20		DCC	WASHINGTON SHERMAN	, BW1079032	(702)202- 3050	UHCRX	2.72
										Ŧ	otal	1 Subto	tal:	20	\$ 2.72
1937057-7841	SULFAMETH/TRIN ETHOPRIM 800/160MG TB	A TAKE 1 TABLET BY MOUTH TWICE DAILY	AUROBIND	O65862- 0420-05		10	10/09/2019	20		DCC	WASHINGTON SHERMAN	I, BW1079032	(702)202- 3050	UHCRX	3.30

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CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

DATE PRINTED: 12/18/2020

INSURANCE PROFILE

12/15/2018 through 12/15/2020

Patient Pho Date of Birt		Gender: F									Allergy Condi Health	tions: None on file None on file		
Rx-Store	Medication	Instructions	Drug Mfr	NDC	Class	Days Supply	Entered Date	FIII Qty	Fill Nbr	RPH	Pbr Name	DEA# Pbr Phor	ne Plan	Cust Amt
										Ť	otal	1 Subtotal:	20	\$ 3.30
1941086-7841	OXYCODONE/ACE TAMINOPHN 7.5- 325MG TB	TAKE 1 TABLET BY MOUTH EVERY 24 HOURS AS NEEDED FOR PAIN	MALLINCKR ODT	00406- 0522-01	C2	30	10/15/2019	30		AAA	EASTMAN, MICHAEL	ME0221452 (702)316- 2281	UHCRX	15.00
										T	otal	1 Subtotal:	30	\$ 15.00
1942083-7841	TOPIRAMATE 25MG TABLETS	TAKE 1 TABLET BY MOUTH EVERY NIGHT AT BEDTIME AS DIRECTED. INCREASE BY 25 MG EVERY 7 DAYS UNTIL A DOSE OF 200 MG IS REACHED.	ZYDUS	68382- 0138-05		30	10/17/2019	120		TNV	EASTMAN, MICHAEL	ME0221452 (702)316- 2281	UHCRX	8.83
1942083-7841	TOPIRAMATE 25MG TABLETS	TAKE 1 TABLET BY MOUTH EVERY NIGHT AT BEDTIME AS DIRECTED. INCREASE BY 25 MG EVERY 7 DAYS UNTIL A DOSE OF 200 MG IS REACHED.	ZYDUS	68382- 0138-05		30	11/10/2019	120		WTE	EASTMAN, MICHAEL	ME0221452 (702)316- 2281	UHCRX	8.83

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CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

DATE PRINTED: 12/18/2020

INSURANCE PROFILE

12/15/2018 through 12/15/2020

Allergy Conditions: None on file Patient Phone: None on file

Date of Bird	th:	Gender: F									realth	N	one on file		
Rx-Store	Medication	Instructions	Drug Mfr	NDC	Class	Days Supply	Entered Date	Fill Qty	FIII Nbr	RPH	Pbr Name	DEA#	Pbr Phor	ne Plan	Cust Amt
										Ŧ	otal	2 Sub	ototal:	240	\$ 17.66
1950622-7841	METRONIDAZOLE 500MG TABLETS	TAKE 1 TABLET(500 MG) BY MOUTH TWICE DAILY FOR 7 DAYS	TEVA	50111- 0334-02		7	10/30/2019	14		SMT	DI LAURO, MICHELE		(702)383- 2300	UHCRX	3.98
										Ŧ	otal	1 Sub	ototal:	14	\$ 3.98
1959654-7841	TOPIRAMATE 200MG TABLETS	TAKE 1 TABLET BY MOUTH AT BEDTIME AS DIRECTED	ZYDUS	68382- 0141-14	RX	30	11/12/2019	30		AAA	EASTMAN, MICHAEL	ME02214	352 (702)316- 2281	UHCRX	7.20
1959654-7841	TOPIRAMATE 200MG TABLETS	TAKE 1 TABLET BY MOUTH AT BEDTIME AS DIRECTED	ZYDUS	68382- 0141-14		30	12/14/2019	30		TNV	EASTMAN, MICHAEL	ME02214	152 (702)316- 2281	UHCRX	4.90
										Ī	otal	2 Su	ototal:	60	\$ 12.10
1959656-7841	OXYCODONE/ACE TAMINOPHN 7.5- 325MG TB	TAKE 1 TABLET BY MOUTH EVERY 24 HOURS AS NEEDED FOR PAIN	MALLINCKF ODT	R 00406- 0522-01	C2	30	11/12/2019	30		DCC	EASTMAN, MICHAEL	ME02214	452 (702)316- 2281	UHCRX	15.00
										ī	otal	1 Su	btotal:	30	\$ 15.00
1976829-7841		TAKE 1 TABLET BY MOUTH EVERY 24	MALLINCKF ODT	R 00406- 0522-01	C2	30	12/09/2019	30		AAA	EASTMAN, MICHAEL	ME0221	452 (702)316- 2281	UHCRX	7.48

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CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

DATE PRINTED: 12/18/2020

INSURANCE PROFILE

12/15/2018 through 12/15/2020

Patient Pho Date of Bir		Gender: F									Allergy Condit Health		one on file one on file		
Rx-Store	Medication	Instructions	Drug Mfr	NDC	Class	Days Supply	Entered Date	Fill Qty	Fill Nbr	RPH	Pbr Name	DEA#	Pbr Pho	ne Plan	Cust Amt
	325MG TB	HOURS AS NEEDED FOR PAIN													
										T	otal	1 Su	ototal:	30	\$ 7.48
1998407-7841		TAKE 10 ML BY MOUTH FOUR TIMES DAILY AS NEEDED FOR CONGESTION OR COUGH		00574- 1104-04		6	01/13/2020	240		AAA	JOSEPH, MARIAMMA	MJ25332	77 (702)383- 2300	UHCRX	15.00
										T	otal	1 Su	ototal:	240	\$ 15.00
1998408-7841	IPRATROPIUM 0.06% NAS SP 15ML (165)	USE 2 SPRAYS IN EACH NOSTRIL FOUR TIMES DAILY	ROXANE	00054- 0046-41		10	01/13/2020	15		AAA	JOSEPH, MARIAMMA	MJ25332	77 (702)383- 2300	UHCRX	15.00
										Ť	otal	1 Su	ototal:	15	\$ 15.00
1998411-7841	VENTOLIN HFA INH W/DOS CTR 200PUFFS	INHALE 2 PUFFS BY MOUTH EVERY FOUR TO SIX HOURS AS NEEDED FOR COUGH, WHEEZING, AND SHORTNESS OF BREATH	GLAXO SMITH KLINE	00173- 0682-20		12	01/13/2020	18		AAA	JOSEPH, MARIAMMA	MJ25332	77 (702)383- 2300	UHCRX	23.99

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CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

Allergy Conditions: None on file

DATE PRINTED: 12/18/2020

INSURANCE PROFILE

12/15/2018 through 12/15/2020

Date of Bir		Gender: F								1	Health	No	ne on file		
Rx-Store	Medication	Instructions	Drug Mfr	NDC	Class	Days Supply	Entered Date		Fill Nbr	RPH	Pbr Name	DEA#	Pbr Phor	ne Plan	Cust Amt
										Ŧ	otal	1 Subt	otal:	18	\$ 23.99
1998412-7841	AZITHROMYCIN 250MG TABLETS 6-PAK	TAKE 2 TABLETS BY MOUTH ON DAY 1, THEN TAKE 1 TABLET BY MOUTH DAILY FOR 4 DAYS	SANDOZ	00781- 8089-26		5	01/13/2020	6		AAA	JOSEPH, MARIAMMA	MJ253327	7 (702)383- 2300	UHCRX	3.23
										Ť	otal	1 Sub	total:	6	\$ 3.23
2001771-7841	LIDOCAINE 2% VISC ORAL SOLUTION	GARGLE 10 TO 15 ML FOR 2 MINUTES AND SPIT OUT, EVERY 4 TO 6 HOURS AS NEEDED		50383- 0775-04		10	01/16/2020	150		AAA	PARCON, PAI	ULBP555522	6 (702)492- 4895	UHCRX	4.60
										ī	otal	1 Sub	total:	150	\$ 4.60
2001775-7841	PREDNISONE 20MG TABLETS	TAKE 3 TABLETS BY MOUTH ONCE DAILY FOR 3 DAYS, 2	ACTAVIS	00591- 5443-05		9	01/16/2020	18		AAA	PARCON, PA	ULBP555522	6 (702)492- 4895	UHCRX	2.69

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TABLETS ONCE DAILY FOR 3 DAYS, THEN 1 TABLET DAILY FOR 3 DAYS

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CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

DATE PRINTED: 12/18/2020

INSURANCE PROFILE

12/15/2018 through 12/15/2020

Patient Phone:

Allergy Conditions: None on file Health None on file

Date of Birt	th:	Gender: F													
Rx-Store	Medication	Instructions	Drug Mfr	NDC	Class	Days Supply	Entered Date	Fill Qty	Fill Nbr	RPH	Pbr Name	DEA#	Pbr Phor	ne Plan	Cust Amt
										T	otal	1 Sub	total:	18	\$ 2.69
2002146-7841		TAKE 10 ML BY MOUTH FOUR TIMES DAILY AS NEEDED		00574- 1104-16		6	01/17/2020	240		TNV	PARCON, PAL	JLBP55552	26 (702)492- 4895	UHCRX	15.00
										Ŧ	otal	1 Sub	total:	240	\$ 15.00
2004227-7841	TOPIRAMATE 200MG TABLETS	TAKE 1 TABLET BY MOUTH AT BEDTIME AS DIRECTED	ZYDUS	68382- 0141-14		30	01/20/2020	30		SMT	EASTMAN, MICHAEL	ME02214	52 (702)316- 2281	UHCRX	4.65
2004227-7841	TOPIRAMATE 200MG TABLETS	TAKE 1 TABLET BY MOUTH AT BEDTIME AS DIRECTED	ZYDUS	68382- 0141-14		30	02/17/2020	30		AAA	EASTMAN, MICHAEL	ME02214	52 (702)316- 2281	UHCRX	4.65
										Ŧ	otal	2 Sub	ototal:	60	\$ 9.30
2004228-7841	OXYCODONE/ACE TAMINOPHN 7.5- 325MG TB	TAKE 1 TABLET BY MOUTH EVERY 24 HOURS AS NEEDED FOR PAIN	MALLINCKF ODT	00406- 0522-01		30	01/20/2020	30		SMT	EASTMAN, MICHAEL	ME02214	52 (702)316- 2281	UHCRX	7.23
										ī	otal	1 Sub	ototal:	30	\$ 7.23
2005824-7841	PROMETHAZINE DM SYRUP	TAKE 5 TO 10 ML BY MOUTH EVERY 6	MORTON GROVE	60432- 0604-16		5	01/22/2020	200		SMT	BOYLAN, DANIEL	MB44323	364 (702)492- 4850	UHCRX	4.04

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CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

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INSURANCE PROFILE

12/15/2018 through 12/15/2020

Patient Pho		Gender: F									Allergy Conditi Health		on file on file		
Rx-Store	Medication	Instructions	Drug Mfr	NDC	Class	Days Supply	Entered Date	Fill Qty	Fill Nbr	RPH	Pbr Name	DEA# F	br Phor	ie Plan	Cust Amt
		HOURS AS NEEDED										-			
										Ŧ	otal	1 Subtot	al:	200	\$ 4.04
2005825-7841	DOXYCYCLINE MONOHYDRATE 100MG CAPS	TAKE ONE CAPSULE BY MOUTH EVERY 12 HOURS	ALEMBIC	62332- 0250-50	RX	7	01/22/2020	14		SMT	BOYLAN, DANIEL	MB4432364	(702)492- 4850	UHCRX	5.27
										Ŧ	otal	1 Subtot	al:	14	\$ 5.27
2017076-7841	ESCITALOPRAM 10MG TABLETS	TAKE 1 TABLET BY MOUTH DAILY	AUROBINDO	065862- 0374-01	RX	30	02/07/2020	30		TNV	NORRIS, KYRA		(702)984- 5200	UHCRX	3.14
2017076-7841	ESCITALOPRAM 10MG TABLETS	TAKE 1 TABLET BY MOUTH DAILY	AUROBINDO	065862- 0374-01	RX	30	04/14/2020	30		AAA	NORRIS, KYRA		(702)984- 5200	UHCRX	3.38
										Ŧ	otal	2 Subtot	al:	60	\$ 6.52
2023672-7841	OXYCODONE/ACE TAMINOPHN 7.5- 325MG TB	TAKE 1 TABLET BY MOUTH EVERY 24 HOURS AS NEEDED FOR PAIN	MALLINCKR ODT	00406- 0522-01	C2	30	02/17/2020	30		DCC	EASTMAN, MICHAEL	ME0221452	(702)316- 2281	UHCRX	7 23
										ī	otal	1 Subto	al:	30	\$ 7.23

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CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

DATE PRINTED: 12/18/2020

INSURANCE PROFILE

12/15/2018 through 12/15/2020

Patient Pho Date of Birth		Gender: F									Allergy Condit Health		one on file one on file		
Rx-Store	Medication	Instructions	Drug Mfr	NDC	Class	Days Supply	Entered Date	Fill Qty	Fill Nbr	RPH	Pbr Name	DEA#	Pbr Phon	e Plan	Cust Amt
2043643-7841	TOPIRAMATE 200MG TABLETS	TAKE 1 TABLET BY MOUTH AT BEDTIME AS DIRECTED	ZYDUS	68382- 0141-14	RX	30	03/16/2020	30		AAA	EASTMAN, MICHAEL	ME02214	52 (702)316- 2281	UHCRX	4.65
2043643-7841	TOPIRAMATE 200MG TABLETS	TAKE 1 TABLET BY MOUTH AT BEDTIME AS DIRECTED	ZYDUS	68382- 0141-14	RX	30	04/14/2020	30		AAA	EASTMAN, MICHAEL	ME02214	52 (702)316- 2281	UHCRX	4.52
										Ŧ	otal	2 Sub	ototal:	60	\$ 9.17
2043645-7841	OXYCODONE/ACE TAMINOPHN 7.5- 325MG TB	TAKE 1 TABLET BY MOUTH EVERY 24 HOURS AS NEEDED FOR PAIN	MALLINCKR ODT	00406- 0522-01	C2	30	03/16/2020	30		AAA	EASTMAN, MICHAEL	ME02214	52 (702)316- 2281	UHCRX	7.23
										Ŧ	otal	1 Sul	ototal:	30	\$ 7.23
2045122-7841	PROCHLORPERA ZINE 25MG SUPPOSITORIES	UNWRAP AND INSERT 1 SUPPOSITORY RECTALLY EVERY 8 HOURS AS NEEDED FOR NAUSEA AND VOMITING	G & W	00713- 0135-12		3	03/18/2020	10		DCC	PARKER, BRIAN	BP44819	49 (702)240- 9500	UHCRX	15.00
										Ŧ	otal	1 Sul	ototal:	10	\$ 15.00

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DATE PRINTED: 12/18/2020

Patient Pho Date of Birt		Gender: F									Allergy Condit Health		ne on file ne on file		
Rx-Store	Medication	Instructions	Drug Mfr	NDC	Class	Days Supply		Fill Qty	Fill Nbr	RPH	Pbr Name	DEA#	Pbr Phon	e Plan	Cust Amt
2045123-7841	CEPHALEXIN 500MG	TAKE ONE CAPSULE BY MOUTH EVERY 6 HOURS UNTIL ALL TAKEN	TEVA	00093- 3147-05	RX	5	03/17/2020	20		VMT	PARKER, BRIAN	BP4481949	9 (702)240- 9500	UHCRX	3.05
										Ŧ	otal	1 Subt	otal:	20	\$ 3.05
2045124-7841	DIAZEPAM 5MG TABLETS	TAKE 1 TABLET BY MOUTH EVERY 8 HOURS AS DIRECTED	IVAX	00172- 3926-70		4	03/17/2020	12		TNV	PARKER, BRIAN	BP448194	9 (702)240- 9500	UHCRX	1.48
										Ī	otal	1 Subt	otal:	12	\$ 1.48
2068056-7841	TOPIRAMATE 200MG TABLETS	TAKE 1 TABLET BY MOUTH AT BEDTIME AS DIRECTED	ZYDUS	68382- 0141-14		30	04/27/2020	30		DCC	EASTMAN, MICHAEL	ME022145	2 (702)316- 2281	UHCRX	4.85
2068056-7841	TOPIRAMATE 200MG TABLETS	TAKE 1 TABLET BY MOUTH AT BEDTIME AS DIRECTED	ZYDUS	68382- 0141-14		30	05/27/2020	30		AAA	EASTMAN, MICHAEL	ME022145	2 (702)316- 2281	UHCRX	4.86
										Ī	Total	2 Subt	total:	60	\$ 9.71
2068058-7841	OXYCODONE/ACE TAMINOPHN 7.5- 325MG TB	TAKE 1 TABLET BY MOUTH EVERY 24 HOURS AS NEEDED FOR PAIN	MALLINCKF ODT	R 00406- 0522-01	C2	30	04/27/2020	30		DCC	EASTMAN, MICHAEL	ME022145	52 (702)316- 2281	UHCRX	8.35

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CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

DATE PRINTED: 12/18/2020

INSURANCE PROFILE

12/15/2018 through 12/15/2020

Patient Phone:

Allergy Conditions: None on file
Health None on file

Date of Birth: Gender: F Rx-Store Medication Instructions Drug Mfr NDC Class Days Entered Fill FIII RPH Pbr Name DEA# Pbr Phone Plan **Cust Amt** Supply Date Qty Nbr Total 1 Subtotal: \$ 8.35 2084216-7841 OXYCODONE/ACE TAKE 1 TABLET BY MALLINCKR 00406-ODT 0512-05 EASTMAN, MICHAEL C2 30 05/26/2020 30 ME0221452 (702)316-UHCRX 3.84 TAMINOPHEN 5-MOUTH EVERY 24 2281 HOURS AS NEEDED 325MG TAB Total Subtotal: 30 \$ 3.84 2105324-7841 TOPIRAMATE TAKE 1 TABLET BY ZYDUS 68382-EASTMAN, ME0221452 (702)316-RX 30 06/30/2020 30 DCC **UHCRX** 4.56 200MG TABLETS MOUTH AT BEDTIME AS DIRECTED 0141-14 MICHAEL 2105324-7841 TOPIRAMATE TAKE 1 TABLET BY ZYDUS 68382- RX EASTMAN, 30 07/30/2020 30 DCC ME0221452 (702)316-UHCRX 4.56 MOUTH AT BEDTIME AS DIRECTED 200MG TABLETS 0141-14 MICHAEL Total 2 Subtotal: 60 \$ 9.12 OXYCODONE/ACE TAKE 1 TABLET BY 2105326-7841 MALLINCKR 00406- C2 06/30/2020 30 15 DCC EASTMAN. ME0221452 (702)316-UHCRX 2.52 MOUTH EVERY 48 HOURS AS NEEDED TAMINOPHEN 5-0512-05 MICHAEL 325MG TAB FOR PAIN Total \$ 2.52 1 Subtotal: 15

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CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

INSURANCE PROFILE
12/15/2018 through 12/15/2020

DATE PRINTED: 12/18/2020

Patient Pho Date of Birt		Gender: F								1	Health	None on f	île	
Rx-Store	Medication	Instructions	Drug Mfr	NDC	Class	Days Supply	Entered Date	FIII Qty	Fill Nbr	RPH	Pbr Name	DEA# Pbr F	hone Plan	Cust Amt
2117875-7841		TAKE 1 TABLET BY MOUTH TWICE DAILY FOR 5 TO 7 DAYS THEN AS NEEDED	CAMBER	31722- 0533-01	RX	5	07/21/2020	20		AAA	CHO, YOUNG	BC6109866 (702) 4850	192- UHCRX	3.07
										T	otal	1 Subtotal:	20	\$ 3.07
2117877-7841	PREDNISONE 10MG** TABLETS	TAKE 4 TABLETS BY MOUTH EVERY DAY X3 DAYS; 2 TABLETS EVERY DAY X3 DAYS; 1 TABLET EVERY DAY X4 DAYS	MUITIVON	70954- 0059-20	RX	10	07/21/2020	22		AAA	CHO, YOUNG	BC6109866 (702) 4850	492- UHCRX	3.53
										Ť	otal	1 Subtotal:	22	\$ 3.53
2117879-7841	PROCHAMBER AERO SPACER	USE WITH VENTOLIN OR PROAIR	RESPIRONI C	08373- 9177-00		30	07/21/2020	1		AAA	CHO, YOUNG	BC6109866 (702) 4850	492- UHCRX	11.58
										T	otal	1 Subtotal:	1	\$ 11.58
2122093-7841	OXYCODONE/ACE TAMINOPHEN 5- 325MG TAB	TAKE 1 TABLET BY MOUTH EVERY 48 HOURS AS NEEDED	MALLINCKE	00406- 0512-05		30	07/28/2020	15		DCC	EASTMAN, MICHAEL	ME0221452 (702) 2281	316- UHCRX	2.52

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CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

DATE PRINTED: 12/18/2020

INSURANCE PROFILE

12/15/2018 through 12/15/2020

Patient Phone:

Allergy Conditions: None on file

Date of Bir		Gender: F									Health	No	ne on file		
Rx-Store	Medication	Instructions	Drug Mfr	NDC	Class	Days Supply	Entered Date	Fill Qty	Fill Nbr	RPH	Pbr Name	DEA#	Pbr Phor	ne Plan	Cust Amt
										ī	Total	1 Sub	total:	15	\$ 2.52
2122825-7841	BACLOFEN 20MG TABLETS	TAKE 1 TABLET BY MOUTH THREE TIMES DAILY AS NEEDED FOR MUSCLE	TRUPHARM A	52817- 0321-10	RX	30	07/29/2020	90		DCC	NORRIS, KYR	A BN959583	2 (702)984- 5200	UHCRX	15.00
										=	Total	1 Sub	total:	90	\$ 15.00
2123113-7841	VENTOLIN HFA INH W/DOS CTR 200PUFFS	INHALE 1 TO 2 PUFFS BY MOUTH EVERY 4 TO 6 HOURS AS NEEDED FOR WHEEZING OR SHORTNESS OF	GLAXO SMITH KLINE	00173- 0682-20		17	07/29/2020	18		SMT	NORRIS, KYR	A BN959583	12 (702)984- 5200	UHCRX	24.04
										-	Total	1 Sub	total:	18	\$ 24.04
2134980-7841	PONARIS NASAL SOLUTION 30ML	APPLY WITH QTIP INTO NOSTRIL TWICE DAILY AS NEEDED	JAMOL LABS	10592- 0001-01		30	08/18/2020	30		AAA	CHRISTENSE	N,BC04558	75 (702)724- 8844	CASH	11.99
										:	Total	1 Sub	total:	30	\$ 11.99
2156877-7841	TOPIRAMATE 100MG TABLETS	TAKE 3 TABLETS BY MOUTH AT BEDTIME	ZYDUS	68382- 0140-05		30	09/22/2020	90		AAA	EASTMAN, MICHAEL	ME02214	52 (702)316- 2281	APM	7.08

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CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

INSURANCE PROFILE

12/15/2018 through 12/15/2020

DATE PRINTED: 12/18/2020

Patient Pho Date of Birt		Gender: F									Allergy Condition		ne on file ne on file		
Rx-Store	Medication	Instructions	Drug Mfr	NDC	Class	Days Supply	Entered Date	Fili Qty	Fill Nbr	RPH	Pbr Name	DEA#	Pbr Phon	e Plan	Cust Amt
		AS DIRECTED													
2156877-7841	TOPIRAMATE 100MG TABLETS	TAKE 3 TABLETS BY MOUTH AT BEDTIME AS DIRECTED	ZYDUS	68382- 0140-05	RX	30	12/02/2020	90		TNV	EASTMAN, MICHAEL	ME022145	2 (702)316- 2281	APM	6.62
										Ī	otal	2 Subt	otal:	180	\$ 13.70
2157309-7841	VITAMIN D3 5,000 IU (CHOLE) TAB	TAKE 1 TABLET BY MOUTH ONCE DAILY	NATIONAL VITAMIN	79854- 0079-41	ОТ	90	09/28/2020	90		DCC	TENNIS, RACHEL	MT467819	8 (702)331- 9464	CASH	11.99
										Ĭ	otal	1 Subt	total:	90	\$ 11.99
2202850-7841	CYCLOBENZAPRI NE 10MG	TAKE 1 TABLET BY MOUTH THREE TIMES DAILY	TRUPHARM A	52817- 0332-00		7	11/30/2020	21		AAA	SARNA, KEVIN	MS421236	8 (725)777- 3350	APM	0.85
										Ī	otal	1 Subi	total:	21	\$ 0.85
3211701-3873	FLUCONAZOLE 150MG TABLETS	TAKE 1 TABLET BY MOUTH 1 TIME. MAY REPEAT AFTER 36 HOURS IF NOT RESOLVED	CITRON	57237- 0005-11		1	10/30/2019	1		CCQ	LEE, CHERRY	ML280247	0 (702)838- 2064	UHCRX	3.49

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15 CUSTODIAN OF RECORDS 1901 EAST VOORHEES STREET DANVILLE, IL 61834

INSURANCE PROFILE

12/15/2018 through 12/15/2020

DATE PRINTED: 12/18/2020

Patient Phone: Date of Birth: Gender: F Rx-Store

Allergy Conditions: None on file Health

None on file

x-Store	Medication	Instructions	Drug Mir	NDC	Class	Supply	Date	Qty		RPH	Pbr Name	DEA#	Pbr Phone	Plan	Ç	ust A	mt
										T	otal	1 Sut	total:	1			\$ 3.49
						·	Total S	cripts:		56			Total Price:			\$	413.95
							Using g	enerio	s you	saved	d a total of:						\$ 0.00
							Using r	nore g	eneric	s you	could have s	aved a to	al				\$ 0.00
							Your in	surano	ce sav	ed you	u a total of:					\$ 4,	960.69
							Your ca	sh qu	antity	discou	unt saved you	a total			_		\$ 0.00
													Pa	age	15	of	15

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REPORT: RX0920 05/08/20
PAT LAST NAME FIRST NV WALGREENS PURGED DATA FOR STORE 07841 PAGE: 276190

PAT ADDRESS PAT PHONE# BIRTH DATE

RX NUMBER DRUG NAME DRUG MFR CTL PLAN RX IMAGE ID

DOC NAME DOC ADDRESS
ORIG DATE OTY REFILLS DAYS SUPPLY RX COMMENTS
ENTER DATE CIND ENT/VER FILL QTY REFILL CUST AMT TOT AMT FILL SOLD DATE CLAIM # PARTIAL CODE PLAN
AUTH NBR AUTH BY CTL PLAN RX IMAGE ID DOC PHONE# DEA#

RX 1767667 PREDNISONE 10MG* TABLETS CADISTA
NOCHE, A 4880 WYNN RD LAS VEGAS, NV 89179-2072
SIG: TK 4 TS PO D X3DAYS; 3 TS D X3DAYS; 2 TS D X3DAYS; 1 T D X3DAYS; THEN STOP
12/28/2018 30 0 12 RX UHCRX 0784103154605735516 (702)871-5005 FN1133278

I	REPORT: RX0920	05/08/20		NV WALGREENS	PURGED DA	ATA FOR STO	ORE 07	841			PAGE: 276191
	PAT LAST NAME	FIRST		PAT ADDRESS						PAT PHONE# 1	BIRTH DATE
	NUMBER DRUG NA OC NAME DOC ORIG DATE OTY ENTER DATE CIND AUTH NBR AUTH	ADDRESS REFILLS I ENT/VER FII	DAYS SUPPLY RX LL QTY REFILL					ı	RX IMAGE ID DOC PHONE# E CLAIM #	DEA#	DE PLAN
	12/28/2018 12/28/2018 0				5.10	0.00	12/2	9/2018	183627398793	251998	UHCRX
	1773764 OXYCODO ASTMAN, M 9920 W C SIG: TK 1 T PO BI	HEYENNE AVE L			T		C2		07841641546 (702)316-2281		
	XFER TO STORE: 7 01/08/2019 60 01/08/2019 0	0	0	NV ENT INIT:	KIY 01/	22/2019	XFER	FROM STO	RE DEA: BW73988	32 RPH INIT:	DCC
	1775440 GABAPEN ASTMAN, M 9920 W C SIG: TK 1 C PO HS 12/04/2018 30	HEYENNE AVE L	AS VEGAS, NV 891				RX		07841691547 (702)316-2281		
	1782457 OXYCODO ASTMAN, M 9920 W C SIG: TK 1 T PO BI 01/08/2019 60	NE/ACETAMINOP CHEYENNE AVE L D PRF PAIN	HN 7.5-325MG TB AS VEGAS, NV 891		Т		C2		07841641546 (702)316-2281		
	01/00/2019			1	0.42	0.00	01/2	22/2019	190225734109	9240998	UHCRX

REPORT: RX0920 08/14/20 NV WALGREENS PURGED DATA FOR STORE 03873 PAGE: 68002 PAT LAST NAME PAT PHONE# BIRTH DATE

CTL PLAN RX IMAGE ID DOC PHONE# DEA# RX NUMBER DRUG NAME DOC ADDRESS DRUG MFR CTL PLAN DOC PHONE#

DOC NAME DOC ADDRESS DOC PHONE#

ORIG DATE QTY REFILLS DAYS SUPPLY RX COMMENTS

ENTER DATE CIND ENT/VER FILL QTY REFILL CUST ANT TOT ANT FILL SOLD DATE CLAIM # AUTH NBR

PARTIAL CODE PLAN

RX 3098142 HYDROXYZINE HCL 50MG TABS (WHITE) TEVA KLEINMAN, L 4880 WYNN RD LAS VEGAS, NV 89179-2072 SIG: TK = T PO TID PRN 04/07/2019 10 0 3 04/07/2019 JHK/JHK 10 ORIG RX UHCRX 0387351155463043317 (702)871-5005 MC2456211

4.52 0.00 04/07/2019 190971007353201997 UHCRX

REPORT: RX0920 08/14/20

NV WALGREENS PURGED DATA FOR STORE 07841

PAT PHONE# BIRTH DATE

PAGE: 270770

PAT LAST NAME FIRST

PAT ADDRESS

RX NUMBER DRUG NAME DOC ADDRESS DRUG MFR CIL PLAN RX IMAGE 1
DOC NAME DOC ADDRESS DOC PHONE#

ORIG DATE QTY REFILLS DAYS SUPPLY RX COMMENTS
ENTER DATE CIND ENT/VER FILL QTY REFILL CUST AMT TOT AMT FILL SOLD DATE CLAIM #
AUTH NBR AUTH BY

CTL PLAN RX IMAGE ID DOC PHONE# DEA#

PARTIAL CODE PLAN

RX 1795228 GABAPENTIN 400MG CAPSULES CIPLA EASTMAN, M 9920 W CHEYENNE AVE LAS VEGAS, NV 89179-2072 SIG: TK 1 C PO HS 02/11/2019 30 1 30

RX UHCRX 0784139154993161719 (702)316-2281 ME0221452

REPORT: RX0920	08/14/20	NV WALGREENS PURGED DATA FOR STORE 07841	PAGE: 270771
PAT LAST NAME	FIRST	PAT ADDRESS PAT PHO	NE# BIRTH DATE

RX NUMBER DRUG NAME DOC NAME DOC ADDRESS ORIG DATE OTY REFILLS DAY.	DRUG MFR S SUPPLY RX COMMENTS	CTL PLAN	RX IMAGE ID DOC PHONE# DEA#	
ENTER DATE CIND ENT/VER FILL (AUTH NBR AUTH BY		TOT AMT FILL SOLD	DATE CLAIM # PARTIAL CODE P	LAN
02/11/2019 XXX/AAA 30 02/11/2019 XXX/SMT 0	ORIG 3.45	0.00 02/12/20	.9 190425962614269999 UHCRX	
03/12/2019 JXP/DCC 30 RX 1795229 OXYCODONE/ACETAMINOPHN EASTMAN, M 9920 W CHEYENNE AVE LAS SIG: TK 1 T PO Q 24 H PP PAIN 02/11/2019 30 0		0.00 03/13/20 C2 UHC		
02/11/2019 XXX/AAA 30 02/11/2019 XXX/SMT 0	ORIG 15.00	5.61 02/12/20	19 190425963218263999 UHCRX	
RX 1813435 OXYCODONE/ACETAMINOPHN EASTMAN, M 9920 W CHEYENNE AVE LAS SIG: TK 1 T PO Q 24 H PRF PAIN 03/11/2019 30 0		C2 UHC	RX 0784135155234693316 (702)316-2281 ME0221452	
03/12/2019 DCC/DCC 30 03/11/2019 XXX/SMT 0	ORIG 15.00	5.61 03/13/20	19 190712442216221999 UHCRX	

REPORT: RX0920 11/06/20 NV WALGREENS PURGED DATA FOR STORE 07841 PAGE: 254390 FIRST PAT LAST NAME PAT ADDRESS PAT PHONE# BIRTH DATE NUMBER DRUG NAME DRUG MFR CTL PLAN KA LUMAGE
OC NAME DOC ADDRESS DOC PHONE#
ORIG DATE QTY REFILLS DAYS SUPPLY RX COMMENTS
ENTER DATE CIND ENT/VER FILL QTY REFILL CUST AMT TOT AMT FILL SOLD DATE CLAIM # RX NUMBER DOC NAME RX IMAGE ID DOC PHONE# DEA# PARTIAL CODE PLAN RX 1884442 OXYCODONE/ACETAMINOPHN 7.5-325MG TB MALLINCKRODT EASTMAH, M 9920 W CHEYENNE AVE LAS VEGAS, NV 89179-2072 SIG: TK 1 T PO Q 24 H PRF PAIN 07/09/2019 30 0 30 0784144156271855816 (702)316-2281 ME0221452

07/09/2019 07/09/2019 0 XXX/TNV XXX/TNV

ORIG 15.00 5.61 07/09/2019 191906295988235999

UHCRX

Script Details - Rx Number: 1937054-7841 Script Front Image		
	Promised Time	
Dr		
Script Back Image	Annotations	
No Back Image Available	No Annotations	

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Script Details - Rx Number: 1937055-7841 Script Front Image		
The algreens Initials Promised Time Name Date D Q G Address AL/HC Phone# Birth Date I valum (Um) Morogan I was Was Worogan I was Was Was I was Was I was Was Was I was Was Was I was Was Was I was		
VM/Caller ID WIC#964880		
Script Back Image	Annotations	
No Back Image Available	No Annotations	

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NSBME 0122

Script Details - Rx Number: 1937056-7841 Script Front Image		
	Promised Time Date 10/9/15 AL/HC Birth Date Lum (hy ///nergan) 25 mg 7 D & Promised Time	
Dr. S - WISH MAKES Refill Address Phone# 100 202-3050 DEA/NPI# BWI079032- VM/Caller ID WIC#964880		
Script Back Image	Annotations	
No Back Image Available	No Annotations	

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Script Details - Rx Number: 1937057-7841 Script Front Image	
Walgreens Initia Name Address Phone# \$\frac{319}{20}\$	Date
Dr	S- WASNING-ZO SUBSTITUTION PERMISSIBLE
Script Back Image	Annotations
No Back Image Available	No Annotations

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NSBME 0124

EXHIBIT 4

EXHIBIT 4



VIDA SPA

Patient Name:

Birthdate:

Date Taken: 09/03/2019 Today's Date: 12/15/2020 Vida Spa 3225 S Rainbow Blvd, #107 Las Vegas, NV 89146 702-202-3050

OPERATIVE REPORT

PATIENT NAME:

DOB

DATE: October 13, 2019

PREOPERATIVE DIAGNOSIS: Lipodystrophy ICD10 E88.1

POSTOPERATIVE DIAGNOSIS: Same

PROCEDURE: Liposuction, abdomen and medial inferior upper arms

SURGEON: Tammy Hankins, P.A.-C.

ANESTHESIA: Lidocaine with I:100,000 epinephrine

TUMESCENT: 1500ML NS with 75cc Lidocaine 2% with epi 1:100,000

BLOOD LOSS: less than 50cc.

VOLUME REMOVED: 1400cc total, 1000cc adipose, 400cc serosanguinous fluid

This 23year-old female demonstrates conditions described above of excess and redundant adipose tissue in her abdomen: and medial inferior upper arms and has requested surgical correction. The procedure, alternatives, risks and limitations in this individual case have been very carefully discussed with the patient. All questions have been thoroughly answered, and the patient understands the surgery indicated. She has requested this corrective repair be undertaken, and consent was signed.

The patient ambulated to the operative suite. While standing, the excess and redundant upper inner arm adipose tissue was carefully measured, and marked. The patient was placed on the table in supine position. Bilateral upper arms, and the entire abdomen was prepped with betadine paint, and the patient was draped in the usual sterile manner. 1% Lidocaine with 1:100,000 Epinephrine for anesthesia and vasoconstriction was injected into superficial dermis at incision sites. The surgical incision,4mm via #11 scalpel were symmetrical bilaterally supra pubic, mid umbilical line supra pubic, and medial antecubital fossa bilaterally, with no blood loss. The abdomen was infused with 1L of tumescent fluid, 1000ML NS with 50cc Lidocaine 2% with epi 1:100,000, via 14G 30cannula. The arms were infused with 1L of tumescent fluid, 1000ML NS with 50cc Lidocaine 2% with epi 1:100,000, via 14G 30cannula. After waiting a period of approximately twenty minutes for adequate vasoconstriction, the Vaser liposuction was started.

1

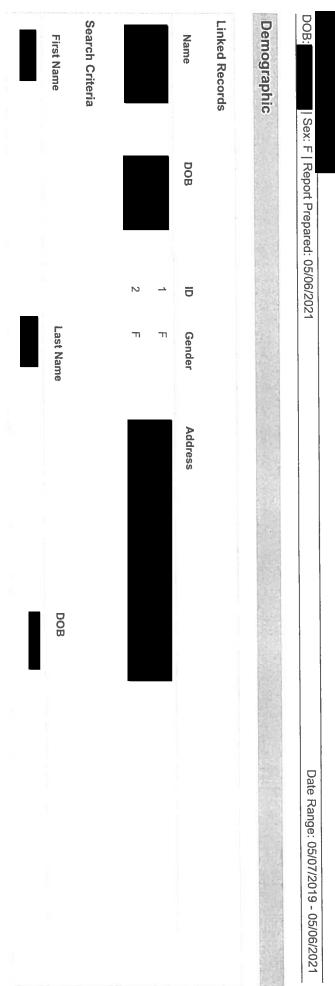
The previously outlined areas were re-identified and treated with Vaser high frequency ultrasound release via 3mm Vaser probe, and then standard cannula liposuction lipoplasty with the Vaser machine and instruments. A 3.7mm liposuction cannula was used. Approximately 700cc of serosanguinous adipose tissue was removed from each side. The patient tolerated the procedure well.

At the end of the operation the patient's wounds were reexamined for hemostasis, and no hematomas were noted. Patient remained stable, and alert and oriented x3 throughout procedure. The patient had nice contour and results appeared to be symmetrical. Sterile Gauze with antibiotic ointment were placed over all incisions, and compression gauze over those bilaterally, with external compression garments placed to remain until follow up the next day.

The procedures were completed without complication and tolerated well with minimal blood loss. The patient was released ambulating to the company of her husband to return home in satisfactory condition. A follow-up appointment was scheduled for the next day, routine post-op medications prescribed, and post-op instructions given to the patient and other responsible party.

Tammy Hankins P.A.-C.

10-9-19



Risk Indicators

NARXCARE SCORES

OVERDOSE RISK SCORE

Narcotic Sedative Stimulant 030 030 020

(Range 000-999)

or the prescriber. NarxCare scores and reports are intended to aid, not replace, medical decision making. None of the information presented should be used as sole justification for providing or This NarxCare report is based on search criteria supplied and the data entered by the dispensing pharmacy. For more information about any prescription, please contact the dispensing pharmacy

refusing to provide medications. The information on this report is not warranted as accurate or complete.

ADDITIONAL RISK INDICATORS (0)

overdose risk in the same dose-dependent manner as doses for full agonist opioids. MME = morphine milligram equivalents. LME = Lorazepam milligram equivalents. MG = dose in milligrams. thresholds meant for opioids prescribed for pain. Buprenorphine products have no agreed upon morphine equivalency, and as partial opioid agonists, are not expected to be associated with *Per CDC guidance, the MME conversion factors prescribed or provided as part of the medication-assisted treatment for opioid use disorder should not be used to benchmark against dosage

Lorazepam MgEq (LME) 18 10 2 0	3 Timeline	Buprenorphine mg 28 16 4 4 Timeline Morphine MgEq (MME)
q (LME) 18 10 2	320 200 80 0	28 16 4 0 0
05/06	05/06	05/06
2m	2m	2m
6m	â a	6m
Ą	14	33.4
_	_	
E00	-	
24	24	24

Summary		Narcotics * (excluding buprenorphine)	prenorphine)	Sedatives		Buprenorphin
Total Prescriptions:	ω	Current Qty:	0	Current Qty:	0	Current Qty:
Total Prescribers:	2	E/day:	0.00	Current mg/day:	0.00	Current mg/day:
Total Pharmacies:	2	day:	0.00	30 Day Avg mg/day:	0.00	30 Day Avg mg/day:

09/04/2019	10/12/2019	10/12/2019	Fill Date
	2	Ν	ō
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Phentermine 37.5 Mg Tablet 68 E6601	Tramadol Hcl 50 Mg Tablet 881	Diazepam 10 Mg Tablet 68 E881	Drug
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	40.00 MME	2.67 LME	Refill Daily Dose * Pymt Type PMP
Other	Ins		Pymt Type
Z	Z	Z	PMP

Name	Address	City	State	Zipcode	Phone
Mustafa Ismail Ahmed	3365 E Flamingo Rd Ste 9	Las Vegas	N	89121-7440	(702) 626-0499
Sherman Washington, Jr	1409 E Lake Mead Blvd	North Las Vegas	N	89030-7120	(818) 375-2013

Name	Address	City	State	Zipcode	Phone
Vesper Specialty Pharmacy Llc (0195)	4225 S Eastern Ave Ste 16	Las Vegas	N	89119-5485	(702) 333-4377
Walgreen Co. (5204)	6865 W Tropicana Ave	Las Vegas	Z	89103-4383	(702) 871-1623

Pharmacies

Prescribers

Disclaimer

Report contents are based on data entered by dispensers and their staff, and may contain errors. The Board of Pharmacy recommends independent verification with dispensers when prudent or necessary. Willful disclosure of prescription information may be subject to disciplinary action, civil penalties or criminal action.

EXHIBIT 5

EXHIBIT 5

Vida Spa 3225 S Rainbow Blvd, #107 Las Vegas, NV 89146

PATIENT NAME: . DOB

DATE: October 8, 2019

PREOPERATIVE DIAGNOSIS: Lipodystrophy ICD10 E88.1

POSTOPERATIVE DIAGNOSIS: Same

PROCEDURE: Liposuction, Abdomen, CPT 15877 trunk, per area.

SURGEON: Tammy Hankins, P.A.-C.

ANESTHESIA: Lidocaine with I:100,000 epinephrine

TUMESCENT: 1000ML NS with 30cc Lidocaine 2% with epi 1:100,000

BLOOD LOSS: less than 50cc.

VOLUME REMOVED: 600cc total, 500cc adipose, 100cc serosanguinous fluid

This 34year-old female demonstrates conditions described above of excess and redundant adipose tissue, and areas of previous liposuction surgical injury with scarring and puckering and dimpling and has requested surgical correction. The procedure, alternatives, risks and limitations in this individual case have been very carefully discussed with the patient. All questions have been thoroughly answered, and the patient understands the surgery indicated. She has requested this corrective repair be undertaken, and consent was signed.

The patient ambulated to the operative suite. While standing, the excess and redundant abdominal adipose and scar tissue was carefully measured.

The patient was placed on the table in supine position. The abdomen was prepped and draped in the usual sterile manner. 1% Lidocaine with 1:100,000 Epinephrine for anesthesia and vasoconstriction was injected into superficial dermis at incision sites. The surgical incision,4mm via #11 scalpel were symmetrical: bilateral suprapubic, inframammary fold at the nipple line, and a single superior unbilical edge, with no blood loss.

The abdomen was infused with 1L of tumescent fluid, 1000ML NS with 30cc Lidocaine 2% with epi 1:100,000, via 14G 30cannula. Service

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After waiting a period of approximately twenty minutes for adequate vasoconstriction, the Vaser liposuction was started.

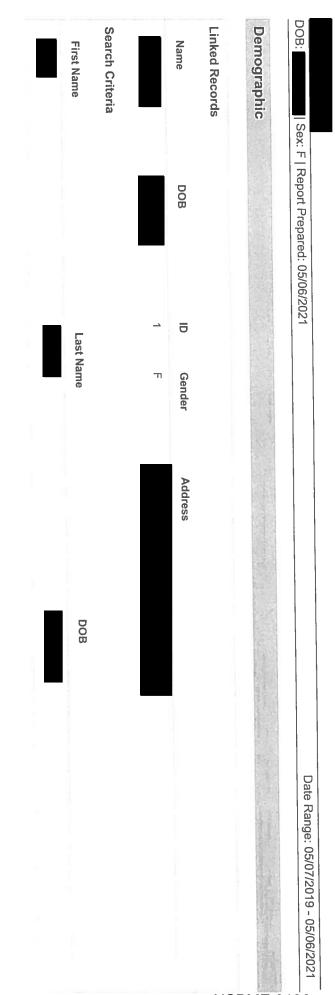
The previously outlined defects were re-identified and treated with Vaser high frequency ultrasound release via 3mm Vaser probe, and then standard cannula liposuction lipoplasty with the Vaser machine and instruments. A 3.7mm liposuction cannula was used. Approximately 600cc of serosanguinous adipose tissue was removed. The fibrotic retracted defects were repaired via high frequency ultrasound release, and then standard cannula liposuction release. The patient tolerated the procedure well.

At the end of the operation the patient's wounds were reexamined for hemostasis, and no hematomas were noted. Patient remained stable, and alert and oriented x3 throughout procedure. The patient had nice contour of the abdomen and thighs and appeared to be symmetrical. Sterile Gauze with antibiotic ointment were places over all 5 incisions, and compression abd pads over those bilaterally, with external compression garment placed to remain until follow up the next day.

The procedures were completed without complication and tolerated well with minimal blood loss. The patient was released ambulating to the company of her friend to return home in satisfactory condition. A follow-up appointment was scheduled for the next day, routine post-op medications prescribed, and post-op instructions given to the patient and other responsible party.

Hankins P.A.-C.

18-8-19



Page 2 of

DOB:

Risk Indicators

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OVERDOSE RISK SCORE

Narcotic Sedative Stimulant 030 010 000

(Range 000-999)

or the prescriber. NarxCare scores and reports are intended to aid, not replace, medical decision making. None of the information presented should be used as sole justification for providing or refusing to provide medications. The information on this report is not warranted as accurate or complete. This NarxCare report is based on search criteria supplied and the data entered by the dispensing pharmacy. For more information about any prescription, please contact the dispensing pharmacy

ADDITIONAL RISK INDICATORS (0)

INFORMATION GRAPH

Prescribers 1 - Sherman Washingto

Timeline

05/06

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overdose risk in the same dose-dependent manner as doses for full agonist opioids. MME = morphine milligram equivalents. LME = Lorazepam milligram equivalents. MG = dose in milligrams. thresholds meant for opioids prescribed for pain. Buprenorphine products have no agreed upon morphine equivalency, and as partial opioid agonists, are not expected to be associated with *Per CDC guidance, the MME conversion factors prescribed or provided as part of the medication-assisted treatment for opioid use disorder should not be used to benchmark against dosage

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10/08/2019	Sold
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4	Qty Days
Sh Was	Prescriber
4182765	Rx #
Wai (0504)	Pharmacy
0/0	Refill
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Prescribers

Sherman Washington, Jr 1409 E Lake Mead Blvc	Name
d Blvd North Las Vegas	City
N	State
89030-7120	Zipcode
(702) 202-3050	Phone

Pharmacies

Name	Address	City	State		Phone
Wal-Mart Pharmacy 10-1584 (0504)	3615 S Rainbow Blvd	Las Vegas	Z	89103-1057 (702) 367-6113	(702) 367-6113

Disclaimer

Report contents are based on data entered by dispensers and their staff, and may contain errors. The Board of Pharmacy recommends independent verification with dispensers when prudent or necessary. Willful disclosure of prescription information may be subject to disciplinary action, civil penalties or criminal action.



EXHIBIT 6

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MERZ AESTHETICS"

TREATMENT RECORD

Patient Name / ID:

Date of Injection: N/14/19

Anesthesia:



Expiration Date: 09/2021

E1.34 (mL) diluent / 50 or 100 unit vial

Units / 0.1 mL: 1

Total Units per Treatment Area: 10/2012/2014 Units / 0.1 mL: 1

Notes:

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Provided to pt. (msent form ontained:

Practitioner Signature: How well well.

MERZ AESTHETICS"

XEOMIN® (incobotulinumtoxinA) Treatment Patient Informed Consent Form

l,the glø	Seller lines.	understand that I will be injected with XEOMI	N ^e (incobotulinumtoxinA) in
_			

XEOMIN® is an acetylcholine release inhibitor and neuromuscular blocking agent indicated for the temporary improvement in the appearance of moderate to severe glabellar lines associated with corrugator and/or procesus muscle activity in adult patients.

Risks and complications that may be associated with injection with XEOMIN® (incobotulinumtoxinA) include, but are not limited to:

- 1. <u>Headaches</u>: I understand that headaches are possible and usually last one day but may persist longer in a very small percentage of patients.
- 2. <u>Injection Site Bruising</u>: I understand that bruising in soft tissues is possible as a result of the needle puncture of the skin Bruising can last for several hours, days, weeks, months and, in rare cases, the effect of bruising could be permanent
- 3. <u>Facial Paresis (Eyelid Ptosis)</u>: I understand that local weakness of the injected muscles is the expected pharmacological action of XEOMIN® and weakness of adjacent muscles may occur which may result in temporary eyelid "drooping"
- 4. Injection Site Bruising, Pain, Swelling, Rash, Local Numbness: I understand that there is a risk of bruising, redness, swelling, itching and pain associated with the procedure. These symptoms are usually mild and last less than a week but can last longer. Patients who are using medications that can prolong bleeding, such as aspirin, warfarin, or certain vitamins and supplements, may experience increased bruising or bleeding at the injection site.
- 5. Eye Disorder: I understand that injections of XEOMIN® may cause reduced blinking or effectiveness of blinking, and that I should seek immediate medical attention if eye pain or irritation occur following treatment. An inability blink the eyelids normally my result in corneal exposure and has been associated with damage to the eye as impaired vision, or double vision, which is usually temporary. The reduced ability to blink has been associated with corneal ulcerations. These side effects can last for several weeks or longer.
- 6. Infection: As with all transcutaneous procedures, I understand that injection of any material carries the risk of infection.
- 7. Hypersensitivity: XEOMIN® is contraindicated in patients with a known hypersensitivity to the active substance botulinum toxin type A or to any of the components in the formulation such as human serum albumin. Hypersensitivity reactions have been reported with botulinum toxin products (anaphylaxis, serum sickness, urticaria, soft tissue edema, and dyspnea).
- 8. Swallowing and Breathing Difficulties: Lunderstand that treatment with XEOMIN® and other botulinum toxin products can result in swallowing or breathing difficulties. Patients with pre-existing swallowing or breathing difficulties may be more susceptible to these complications. In most cases, this is a consequence of weakening of muscles in the area of injection that are involved in breathing or swallowing. These reactions can occur within hours to weeks after injection with botulinum toxin. Seek immediate medical care is swallowing, speech or respiratory disorders arise.
- 9. Pregnancy and Nursing: There are no adequate and well-controlled studies of XEOMIN[®] in pregnant or nursing women.

If you experience loss of strength, muscle weakness, blurred vision, or drooping eyelids occur, avoid driving a car or engaging in other potentially hazardous activities.

No studies of interactions of XEOMIN® with other drugs or substances or implants have been conducted

Patient Acknowledgements:

This above list is not meant to be inclusive of all possible risks associated with XEOMIN® (incobotulinumtoxinA) as there are both known and unknown side effects and complications associated with any medication. I understand that medical attention may be required to resolve complications associated with my injection.

I confirm that I have received and reviewed the XEOMIN® Medication Guide. I confirm that I have discussed the potential risks and benefits of XEOMIN® with my doctor and that my doctor has satisfactorily answered all of my questions. I understand that there is no guarantee of any particular results of any treatment. I understand the results of treatment with XEOMIN® are temporary.

Lacknowledge that I am not pregnant or possibly pregnant, lactating or nursing.

Lunderstand and agree that all services rendered will be charged directly to me, and I am personally responsible for payment. I further agree, in the event of non-payment, to bear the cost of collection, and/or court costs and reasonable legal fees, should they be required. By signing below, I acknowledge that I have read the foregoing informed consent, have had the opportunity to discuss any questions that I have with my doctor to my satisfaction, and consent to the treatment described above with its associated risks. I understand that I have the right not to consent to this treatment and that my consent is voluntary. I hereby release the doctor, the person performing the XEOMIN® injection and the facility from liability associated with this procedure.

	06/13/19
Patients many (N)	M 14 19
Witness Signature 0	Date
Witness Address: OLLJ J. KUMOOW BIJd.	Ste 10+
LUS Vegus, NV 19144.	

WARNING: DISTANT SPREAD OF TOXIN EFFECT

Postmarketing reports indicate that the effects of XEOMIN and all botulinum toxin products may spread from the area of injection to produce symptoms consistent with botulinum toxin effects. These may include asthenia, generalized muscle weakness, diplopia, blurred vision, ptosis, dysphagia, dysphonia, dysarthria, urinary incontinence and breathing difficulties. These symptoms have been reported hours to weeks after injection. Swallowing and breathing difficulties can be life threatening and there have been reports of death. The risk of symptoms is probably greatest in children treated for spasticity but symptoms can also occur in adults treated for spasticity and other conditions, particularly in those patients who have underlying conditions that would predispose them to these symptoms. In unapproved uses, including spasticity in children and adults, and in approved indications, cases of spread of effect have been reported at doses comparable to those used to treat cervical dystonia and at lower doses.

Please see Patient Medication Guide (following pages).

Longright 197013 Mary Ansthetics, In: All rights reserved. Ment Aesthetics is a trademark and XEONIAI is registered trademark of Merz Pharma GmbH & Co. KGaA ... EMC0454-00

MERZ AESTHETICS**

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VIDA SPA
Ph. (702) 202-3050
pwConnect - Hola como estas? te escribimos de VidaSpa para saber como te fue ayer en tu tratamiento, en VidaSpa tu opinion es muy importante para nosotros.

Text

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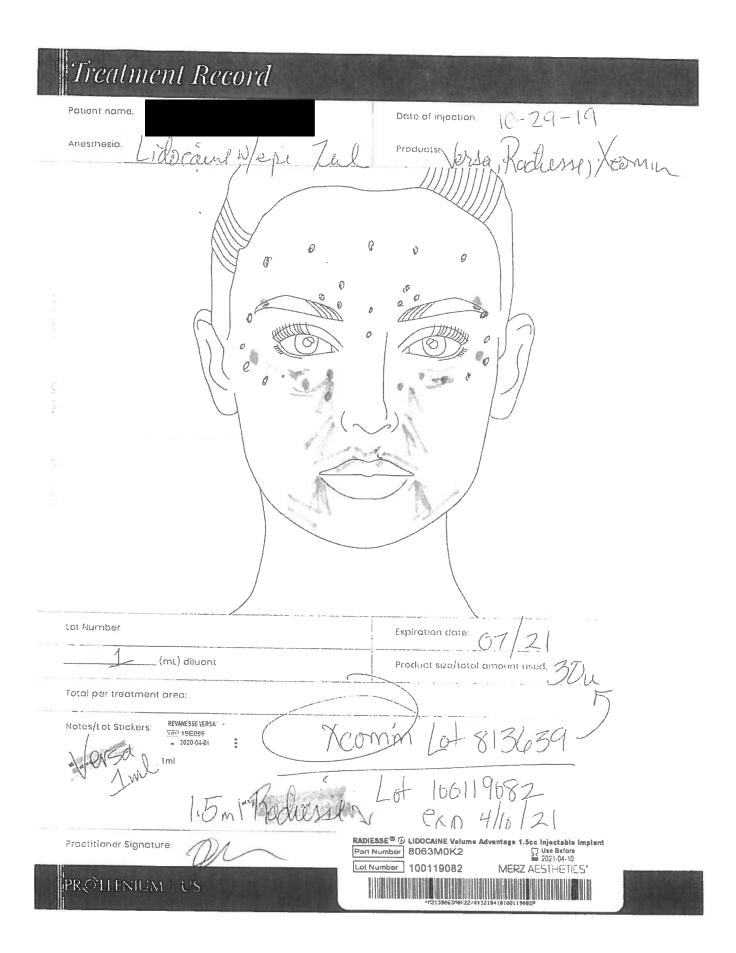
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Hola somos de Vida Medical Spa, queriamos saber como te fue en tu cita con nosotros, dejanos saber y gracias esperamos verla pronto VIDA SPA Ph. (702) 202-3050 ApptRelated Text pwConnect - Hola Sara, como estas? te escribimos de VidaSpa para saber como te fue ayer en tu tratamiento, en VidaSpa tu opinion es muy importante para nosotros. O E O O O O O O O O O O O O O O O O O	SBM	ApptRelated		pw.Connect - know how wa	I'm reaching o s your proced	ut to you fure we hop	rom Vida me be to see you	d spa. we z again.	would like	Q 2		
ApptRelated Text pwConnect - Hola Sara. como estas? te escribimos de VidaSpa para saber como te fue ayer en tu tratamiento, en VidaSpa tu opinion es muy importante para nosotros.	E 0148			Hola somos con nosotros,	dejanos sabe	al Spa, que r y gracias	eriamos sab s esperamos	er como te verla pro	fue en tu onto.	cita		
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MICRONEEDLING/PRP FACIAL

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V12 JV1V1V	RO-NEEDLE DEPTH: 1.0 - 2.5
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CLINICIAN SIGNATURE:	DATE: 4/19/21

	Treatr	nent Record	- II i		
	Patient name		BEST DESIGNATION OF THE PERSON	Date of Injection: 4/19/21	
Secretary and	Anesthesia:	BLT 20110110.	- 0	Products: Ne ISCA	
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Lo	ot Number:	70K023:		Expiration date: 10/21/0£	127.
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To	otal per treatme	ant area: 1.2			
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District Chronic	actitioner Signa		San Park Sec		
Pl	OLLENIU	M ÚS	C.C.		

MERZ AESTHETICS™

TREATMENT RECORD Patient Name / ID 4/19/21 Date of Injection: BUT 20/10/0. Anesthesia: Lot Number: 2022 Expiration Date: (mL) diluent (50 or 100 unit vial Units / 0.1 mL: Total Units per Treatment Area: Notes: 16 Crows Fret 2 Bunny Luce 2 Lip Frig 15 Glubella Luce 14 Forchead. Practitioner Signature:

MERZ AESTHETICS*

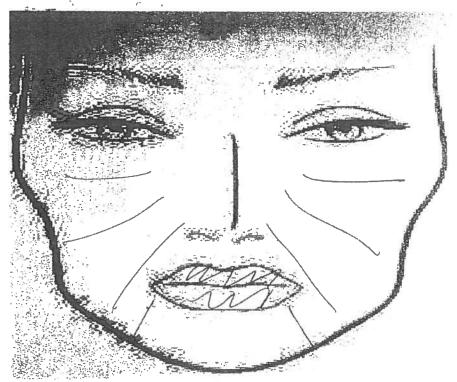
TREATMENT RECO Patient Name / ID: Date of Injection: Anesthesia: BUT 10/10 20 Notes: Skin Clanice wi Injected filler as marked above Place Lot Stickers Here: RADIESSE © Volume Advantage Injectable Implant 1.5 cc RADIESSE® Volume Advantage Injectable Implant 1.5 cc Pari Number 8071 M0K1 □ Use Before 2024-01-06 Part Number 8071M0K1 Lot Number A00001980 Use Before 2024-01-06 Lot Number A00001980

Copyright © 2011 Mert Aesthetics, Inc. All rights leserved. Mert Aesthetics is a trademark of Mert Pharma Gridel & Co. KGAA

Practitioner Signature:

CLIENT:	4/11/0
~	DATE: 7/1/9
PROCEDURE: Investeming fest	elee Silk of Lidoscanie (unl
AREA TREATED: face + Lines	
PRODUCT USED: Nome	VOLUMA XC 1mL GTIN 10888628000018 LOT VB20A80613
PROVIDER: BY MINKES	16 HT EXP 2020-02-12

- o PICTURES TAKEN
- o CONSENT SIGNED



NOTES:_____



CONSENTIMIENTO PARA EL USO DE TRATAMIENTO COSMÉTICO CON BOTOX

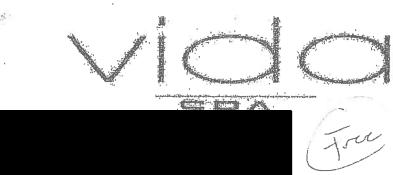
INDICACIONES Y ALTERNATIVAS: Botox es el nombre comercial de la toxina botulínica tipo A, una neurotoxina que bloquea los mensajes entre los músculos y los nervios que los controlan. Los efectos del Botox son evidentes de 2 a 5 días después de su inyección y, su efecto dura generalmente de 4 a 6 meses. La Administración Federal para Drogas y Alimentos (FDA por sus siglas en inglés) ha aprobado el uso de Botox para tratar distonias (espasmos) faciales, estrabismo (ojos desviados) y para suavizar temporalmente las arrugas faciales del entrecejo. Si bien la FDA no ha aprobado las inyecciones para mejorar la apariencia de las arrugas en otras áreas del rostro, los médicos pueden realizar estos procedimientos para los que su uso "no aparece en la etiqueta". Se trata de usos alternativos del Botox, que no incluyen tratamiento, ni cirugías o medicina de ningún nervio o músculo facial.

EFECTOS SECUNDARIOS Y COMPLICACIONES: Estos incluyen, sin limitación: 1. Hematomas 2. Hipocorrección (efecto insuficiente) o hipercorrección (efecto excesivo) 3. Asimetría facial (un lado del rostro difiere del otro) 4. Parálisis de los músculos cercanos que puede producir como consecuencia: párpado caído, doble visión, incapacidad de cerrar el ojo, dificultad para silbar o beber con una pajilla 5. Debilidad generalizada 6. Pérdida permanente de tono muscular con inyecciones repetidas 7. Síndrome similar a la influenza o a una infección respiratoria 8. Náusea o dolor de cabeza 9. Desarrollo de anticuerpos al Botox 10. El Botox contiene albúmina derivada de humanos e implica un riesgo teórico de trasmisión de virus. Sin embargo, no ha habido informes de trasmisión de enfermedades a través del Botox.

CONTRAINDICACIONES: No debe utilizar el Botox si: Está embarazada o en período lactancia; si es alérgica a la albúmina; si tiene una infección; si tiene alguna afección de la piel o una debilidad muscular en el sitio de la inyección; o si tiene síndrome de Eaton-Lambert, enfermedad de Lou Gehrig o miastenia gravis.

Entiendo lo anterior y se me han explicado los riesgos, beneficios y alternativas. No se me han garantizado resultados. Doy mi consentimiento informado para recibir inyecciones de Botox hoy al igual que como tratamiento finturo, según amerite la peceridad.

— Firma dei Paciente		
Firma del Médico		



HOJA DE CONSENTIMIENTO Y TRATAMIENTO CON PLASMA RICO EN PLAQUETAS

Esta técnica consiste en tomar una muestra de su propia sangre y separar sus componentes por un proceso de centrifugación para aislar y concentrar las plaquetas en una fracción de plasma.

El plasma rico en plaquetas (PRP) obtenido se activa mediante la adición de gluconato de calcio antes de ser reinyectado.

En la piel, las plaquetas liberan factores de crecimiento en su relación biológica y una concentración ligeramente más alta que la concentración normal, para estimular la proliferación celular de fibroblastos y la síntesis de matriz extracelular, que contiene proteínas, tales como colágeno y elastina dando las propiedades elásticas de la piel, por lo que puede haber una variación natural en los resultados entre los individuos. No dude en pedir una estimación más específica a su médico acerca de la cantidad de sesiones requeridas.

Los beneficios esperados son la mejora de la elasticidad de la piel con una suavización de las líneas finas y una mejora en el tono de la piel. El PRP también puede permitir el relieno de las arrugas más profundas, como los surcos nasolablales. Los resultados se notan las primeras semanas después de la primera inyección, pero para obtener los mejores resultados, su médico tendrá que ofrecer un protocolo con varias sesiones.

El PRP es un producto directo de su cuerpo, se espera muy pocos efectos secundarios. El PRP se utiliza en numerosos estudios clínicos sobre la curación de las heridas quirúrgicas y crónica sin ninguna manifestación de efectos secundarios graves. Todavía se puede producir en algunos casos:

La presencia de hematoma o rojez en los sitios de inyección.

- Las sensaciones de calor y la tensión superficial de la piei. Estas sensaciones son transitorlos debido al estallido de la estimulación y deba desaparecer en un plazo máximo de 24 a 36 horas después del tratamiento.

En casos muy raros y en pacientes con potencial alérgico significativa, edema puede ocurrir debido a un proceso más grande que inflamatoria normal. Asimismo, recuerda a su médico si usted tiene un historial de elergias a medicamentos u otras sustancias. El uso de PRP en el tratamiento de la regeneración de la piel es estrictamente contra indicado en pacientes con cáncer cervico-faciales en la ausencia de control de la remisión total y pacientes embarazadas.

El uso de PRP también es contra indicado en pacientes con lesiones de la plei pueden ser causados por proceso de proliferación celular anormal. Al igual que con todos los demás tratamientos por inyecciones subcutáneas, está contraindicado el uso de anticoagulantes de forma concomitante con la inyección.

Declaro que he sido informado (a), por via oral, mediante la firma de médico, supuestos efectos, los beneficios potenciales y los posibles riesgos. He leído y entiendido la información por escrito que figuran en este documento. He recibido respuestas satisfactorias a las preguntas que se plantean en relación con el tratamiento. Cómo obtengo una copia de mi declaración de consentimiento por escrito.

En consecuencia, estoy de acuerdo para recibir el tratamiento especificado en la misma.

Me comprometo a informar el médico-investigador de cualquier tratamiento concomitante con otro médico y los medicamentos.

CONSIENTO
Lugar y fecha
Firma del paclente

Firma del paclente

INFORMED CONSENT FOR DERMAL FILLER TREATMENT

PATIENT	Property and the second	
DATE OF BIRTH		
ADDRESS _	- Tables	20 LIXO
PHONE _		J 7100

The purpose of this informed consent form is to provide written information regarding the risks, benefits and alternatives of the procedure named above. This material serves as a supplement to the discussion you have with your doctor/healthcare provider. It is important that you fully understand this information, so please read this document thoroughly. If you have any questions regarding the procedure, ask your doctor/healthcare professional prior to signing the consent form.

THE TREATMENT

Treatment with dermal fillers (such as Juvederm, Restylane, Radiesse and others) can smooth out facial folds and wrinkles, add volume to the lips, and contour facial features that have lost their volume and fullness due to aging, sun exposure, illness, etc. Facial rejuvenation can be carried out with minimal complications. These dermal fillers are injected under the skin with a very fine needle. This produces natural appearing volume under wrinkles and folds which are lifted up and smoothed out. The results can often be seen immediately. Initial

RISKS AND COMPLICATIONS

Before undergoing this procedure, understanding the risks is essential. No procedure is completely risk-free. The following risks may occur, but there may be unforeseen risks and risks that are not included on this list. Some of these risks, if they occur, may necessitate hospitalization, and/or extended outpatient therapy to permit adequate treatment. It has been explained to me that there are certain inherent and potential risks and side effects in any invasive procedure and in this specific instance such risks include but are not limited to: 1) Post treatment discomfort, swelling, redness, bruising, and discoloration; 2) Post treatment infection associated with any transcutaneous injection; 3) Allergic reaction; 4) Reactivation of herpes (cold sores); 5) Lumpiness, visible yellow or white patches; 6) Granuloma formation; 7) Localized necrosis and/or sloughing, with scab and/or without scab if blood vessel occlusion occurs. Initial

PREGNANCY AND ALLERGIES

I am not aware that I am pregnant. I am not trying to get pregnant. I am not lactating (nursing). I do not have or have not had any major illnesses which would prohibit me from receiving dermal fillers. I certify that I do not have multiple allergies or high sensitivity to medications, including but not limited to lidocaine.

ALTERNATIVE PROCEDURES

Alternatives to the procedures and options that I have volunteered for have been fully explained to me. Initial

PAYMENT

I understand that this is an "elective" procedure and that payment is my responsibility and is expected at the time of treatment. Initial

RIGHT TO DISCONTINUE TREATMENT

I understand that I have the right to discontinue treatment at any time. Initial S

TRAINING COURSE

I understand that I have volunteered to be a model patient in a training course and the doctor/healthcare professional who will be treating me has had limited experience with the method of treatment. Initial

1

INFORMED CONSENT FOR DERMAL FILLER TREATMENT

I hereby indemnify the American Academy of Facial Esthetics LLC from any liability relating to the procedures that I have volunteered for. I also understand that any treatment performed is between me and the doctor/healthcare provider who is treating me and I will direct all post-operative questions or concerns to the treating clinician.

Initial

I hereby indemnify the facility/meeting room/hotel where this treatment is being performed from any liability relating to the procedures that I have volunteered for. Initial

PUBLICITY MATERIALS

I authorize the taking of clinical photographs and videos and their use for scientific and marketing purposes both in publications and presentations. During courses given by Common Sense Dentistry and/or The American Academy of Facial Esthetics (AAFE), I understand that photographs and video may be taken of me for educational and marketing purposes. I hold the AAFE harmless for any liability resulting from this production. I waive my rights to any royalties, fees and to inspect the finished production as well as advertising materials in conjunction with these photographs.

RESULTS

Dermal fillers have been shown to be safe and effective when compared to collagen skin implants and related products to fill in wrinkles, lines and folds in the skin on the face. Its effect can last up to 6 months. Most patients are pleased with the results of dermal fillers use. However, like any esthetic procedure, there is no guarantee that you will be completely satisfied. There is no guarantee that wrinkles and folds will disappear completely, or that you will not require additional treatment to achieve the results you seek. The dermal filler procedure is temporary and additional treatments will be required periodically, generally within 4-6 months, involving additional injections for the effect to continue. I am aware that follow-up treatments will be needed to maintain the full effects. I am aware the duration of treatment is dependent on many factors including but not limited to: age, sex, tissue conditions, my general health and life style conditions, and sun exposure. The correction, depending on these factors, may last up to 6 months and in some cases shorter and some cases longer. I have been instructed in and understand the post-treatment instructions. Initial

I understand this is an elective procedure and I hereby voluntarily consent to treatment with dermal fillers for facial rejuvenation, lip enhancement, establish proper lip and smile lines, and replacing facial volume. The procedure has been fully explained to me. I also understand that any treatment performed is between me and the doctor/healthcare provider who is treating me and I will direct all post-operative questions or concerns to the treating clinician. I have read the above and understand it. My questions have been answered satisfactorily. I accept the risks and complications of the procedure and I understand that no guarantees are implied as to the outcome of the procedure. I also certify that If I have any changes in my medical history I will notify the doctor/healthcare professional who treated me immediately. I also state that I read and write in English.

41691

Patient Name (Print)	Patient Signature	Date		
patient. The patient had	an opportunity to have all qu	uestions answered and w	benefits, and alternatives with as offered a copy of this inform questions or concerns after thi	red
Doctor Name (Print)	Doctor 9	Signature	Date	_



CONSENTIMIENTO PARA EL USO DE TRTAMIENTO COSMETICO CON XEOMIN®

INDICACIONES Y ALTERNATIVAS: XEOMIN® es el nombre comercial de la toxina botulínica tipo A, una neurotoxina que bioquea los mensajes entre los músculos y los nervios que los controlan. Los efectos de XEOMIN® son evidentes de 2 a 5 días despúes de su inyección y, su efecto dura generalmente de 4 a 6 meses. La Administración Federal para Drogas y Alimentos (FDA) (por sus siglas en inglés) ha aprobado el uso de XEOMIN® para tartar distonias (espasmos) faciales, estrabismo (ojos desviados) y para suavisar temporalmente las arrugas faciales del entrecejo. Si bien la FDA no ha aprobado las inyecciones para mejorar la aparencia de las arrugas en otras áreas del rostro, los mèdicos pueden realizar estos procedimientos para los que su uso "no aparece en la etiqueta". Se trata de usos alternativos del XEOMIN®, que no incluyen tratamiento, ni cirugías o medicina de ningún nervio o músculo facial.

EFECTOS SECUNDARIOS Y COMPLICACIONES: Estos Incluyen, sin limitación: 1. Hematomas 2. Hipecorreción (efecto Insuficiente) o hipercorreción (efecto excesivo) 3. Asimetría facial (un lado del rostro difiere del otro) 4. Parálisis de los músculos cercanos que puede producir como consecuencia: párpado caído, doble vision, incapacidad de cerrar el ojo, dificultad para silbar o beber con una pajialla 5. Debilidad generalizada. 6. Pèrdida permanente de tono muscular con inyecciones repetidas 7. Síndrome similar a la influenza o una infección respiratoria. 8. Náusea o dolor de cabeza 9. Desarollo de anticuerpos at XEOMIN® 10. El XEOMIN® contiene albúmina derivada de humanos e implica un riesgo teórico de transmission de virus. Si embargo, no ha habido informes de transmissión de enfermedades través del XEOMIN®.

CONTRAINDICACIONES: No debe utilizar el XEOMIN®si: Está embarazada o en período de lactancia; si es alèrgica a la albúmina; si tiene una infección; si tiene alguna afección de la piel o una debilidad muscular en el sitlo de la inyección; o si tiene syndrome de Eaton-Lambert, la enfermedad de Lou Gehrig o miastenia gravis.

Entlendo lo anterior y se me han explicado los riesgos, beneficios y alternativas. No se me han garantizado resultados. Doy mi consentimiento informado para recibir inyecciones de XEOMIN® hoy al igual que como tratamiento futuro, según amerite la necesidad.

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Firma del Pacienta				
-				
Firma del Mèdico				



RADIESSE® or RADIESSE® (+) Injectable Implant Treatment Informed Consent

ollowing areas: \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	understand that I will be injected with	RADIESSE® or RADIESSE® (+) in the

RADIESSE and RADIESSE (+) are both defined as resorbable, injectable implant products. They are approved by the United States Food and Drug Administration (FDA) for the correction of moderate to severe facial wrinkles and folds, such as nasolabial folds. In addition, RADIESSE injectable implant is also FDA approved for the restoration and/or correction of the signs of facial fat loss (lipoatrophy) in people with human immunodeficiency virus.

I have discussed the RADIESSE or RADIESSE (+) injectable implant procedure with my healthcare provider. I understand that risks and complications may be associated with RADIESSE or RADIESSE (+) and the implant procedure itself that can include, but are not limited to:

- Facial Bruising, Redness, Swelling, Itching and Pain: I understand there is a risk of bruising, redness, swelling, itching and pain associated with the procedure. These symptoms are usually mild and last less than a week, but can last longer. Patients who are using medications that can prolong bleeding, such as aspirin or warfarin, may experience increased bruising or bleeding at the injection site.
- 2. Nodules and Palpable Material: I understand there is a risk small lumps may form under my skin, due to the RADIESSE or RADIESSE (+) implant material collecting in an area. I also understand that I may be able to feel the RADIESSE or RADIESSE (+) implant material in the area where the material has been injected. Any foreign material injected into the body may create the possibility of swelling or other local reactions.
- 3. Use in Lips: I understand the safety and efficacy for use of RADIESSE or RADIESSE (+) in lips have not been established. Use in lips may result in unsatisfactory results and injury, such as nodules (small lumps of dermal filler material.) There have been published reports of nodules associated with the use of RADIESSE Injectable Implant injected into the lips.
- 4. Migration: I understand that RADIESSE or RADIESSE (+), as with any filler material, may move from the original place where it was injected.
- 5. Infection: I understand there is a possible risk of infection, as a result of needle injections through the skin and placement of RADIESSE or RADIESSE (+) filler material underneath the skin. In addition, use of RADIESSE injectable implant in any person with active skin inflammation or infection in or near the treatment area should be deferred, until the inflammatory or infectious process has been controlled. In the event an infection occurs, it may necessitate medical treatment or even attempted surgical removal of the RADIESSE implant.
- 6. History of Herpes Infection: I understand injection of any filler material carries the risk of a reccurent outbreak of herpes (fever blisters/cold sores/shingles) and that the outbreak may be severe in nature. I have disclosed to the health care provider my medical history and, in particular, disclosed any prior herpes outbreaks.
- 7. Allergic Reactions: I understand that RADIESSE or RADIESSE (+) should not be used in patients with severe allergies, a history of anaphylaxis, history or presence of multiple severe allergies, or hypersensitivity to any of the ingredients in either RADIESSE or RADIESSE (+): such as calcium hydroxylapatite, carboxymethylcellulose, glycerin or lidocaine hydrochloride [only RADIESSE (+) contains the ingredient of lidocaine hydrochloride]. If I experience an allergic reaction, it may be necessary for my treating healthcare practitioner to discuss use of and/or prescribe an antihistamine and a steroid medication. I understand some cases of allergic reaction have the potential to require hospitalization.

- 8. Keloids/Scarring: I understand that RADIESSE® and RADIESSE® (+) in patients with increased susceptibility to keloid formation and hypertrophic scarring have not been studied.
- 9. Accidental Injection into a Blood Vessel: One of the risks of using RADIESSE or RADIESSE (+) is unintentional injection into a blood vessel. The chances of this happening are very small, but if it does happen, the complications can be serious and may be permanent. These complications, which have been reported for facial injections, can include vision abnormalities, blindness, stroke, temporary scabs, or permanent scarring of the skin. If I have changes in my vision, signs of a stroke (including sudden difficulty speaking, numbness or weakness in my face, arms or legs, difficulty walking, face drooping, severe headache, dizziness or confusion, white appearance of the skin or unusual pain during or shortly after treatment, I understand I should immediately notify my health care practitioner.
- 10. Radio-Opacity: I understand that RADIESSE and RADIESSE (+) are radio-opaque. As such, they are visible on CT scans and may be visible on standard x-ray films. I understand it is important to inform my primary healthcare professionals about this information, including, radiologists. In a radiographic study of 58 patients, there was no indication of RADIESSE injectable implant potentially masking abnormal tissues or being interpreted as tumors in CT scans.
- 11. Duration of Effect: I understand the outcome and longevity of treatment using RADIESSE or RADIESSE (+) will vary among patients. In some instances, additional treatments may be necessary to achieve the desired outcome.
- 12. Additional Dermal (Skin) Therapies: I understand the safety of RADIESSE and RADIESSE (+) injectable implant in conjunction with other dermal therapies such as epilation, UV irradiation, laser treatment, mechanical or chemical peeling procedures has not been evaluated in controlled clinical trials. If laser treatment, chemical peeling, or any other procedure based on active dermal response is considered after treatment with RADIESSE or RADIESSE (+) injectable implant, there is a possible risk of eliciting an inflammatory reaction at the implant site. This also applies if RADIESSE or RADIESSE (+) injectable implant is administered before the skin has healed completely after such a procedure.
- 13. Care Following Treatment: I understand to minimize any strenuous activity after my treatment. Also, I understand the need to minimize or avoid exposure of my treated areas to extensive sun or heat exposure for approximately 24 hours after treatment, or until any initial swelling, bruising or redness goes away.
- 14. Use in Pregnancy, Nursing Females or Patients Under the Age of 18 Years: I understand the safety of RADIESSE and RADIESSE (+) injectable implants for use during pregnancy, in breastfeeding women or in patients under the age of 18 years has not been established.
- 15. Other Reactions: I understand that no studies regarding interactions of RADIESSE and RADIESSE (+) injectable implants with drugs, other substances or implants have been conducted.
- 16. Post-Marketing Surveillance: The following, additional adverse events have been identified during post-approval use of Radiesse or Radiesse (+) injectable implant in the United States and outside the United States. Because they are reported voluntarily from a population of uncertain size, it is not always possible to reliably estimate their frequency or establish a causal connection to Radiesse or Radiesse (+). Such adverse event reports include the following: Over-injection, under-injection, loss of effect, product displacement, tissue death, a foreign body reaction, exposed material, hair loss, tingling, drooping of the face, serious swelling, abscess, paralysis, superficial injection, hematoma, blanching of the skin, blistering of the skin, dark circles, did not like results, asymmetry, dizziness, double vision, festoons, flu-like symptoms, grey discoloration, Guillain-Barre syndrome, fast breathing, lymphoid hyperplasia, nausea, pale skin, prior medical condition worsened, possible blood clot, pericarditis, scarring, sensitivity to cold, skin texture changed, tissue mass developed, vascular compromise, and vision impairment or vision loss.

This list is not meant to be inclusive of all possible risks associated with RADIESSE or RADIESSE (+) injectable implant, as there are both known and unknown side effects and complications associated with any medication or dermal filler injection procedure. I understand medical attention may be required to resolve complications associated with my treatment.



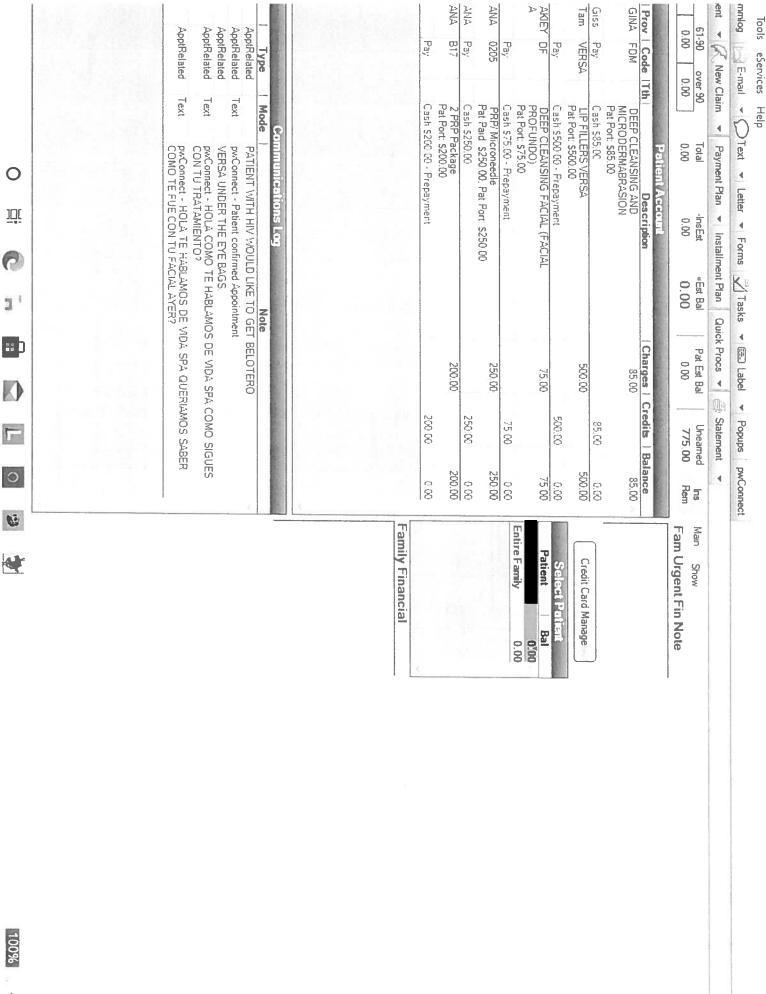
I have discussed the potential risks and benefits of RADIESSE® and RADIESSE® (+) with my doctor. I understand there is no guarantee of any particular results of any treatment.

By signing below, I acknowledge that I have read the foregoing informed consent and have had the opportunity to discuss any questions that I have with my doctor to my satisfaction, and consent to the treatment described above with its associated risks. In addition, I have received a copy of the "Patient Information Guide" for RADIESSE or RADIESSE (+) injectable implant. I understand that I have the right not to consent to this treatment and my consent is voluntary. I hereby release the doctor, the person performing the RADIESSE or RADIESSE (+) implant injection and the facility from liability associated with this procedure.

Patient Signature	V	Witness Signature ANNO SOLOMO, PN
Patient Printed Name		Witness Printed Name
Patient Address		32755 Rainbow - 11700 89146 Witness Address
Phone Number	Date	70 2 702 3050 02 21 21 21 Phone Number Date

EXHIBIT 8

EXHIBIT 8



>

Treatment Reco	Pate of injection 11-05-19
Anesthesia. Italia w.ep	Products VIVSA.
Lot Number: 9 E 9 9 9 9 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Product size/total amount used 1 ml
Notes/Lot Stickers REVANESSE VERSA 100 19E099 2020-04-01	
Practitioner Signature	

BELOTERO BALANCE

BÉLOTERO BALANCE® Treatment Informed Consent

l Filler in the following areas: _	understand that I will be injected with BELOTERO BALANCE Dec	F 11

BELOTERO BALANCE Dermal Filler is a resorbable hyaluronic-acid-based dermal filler approved by the United States Food and Drug Administration (FDA) for the correction of moderate-to-severe facial weights and folds, such as nasolabial folds.

Risks and complications that may be associated with BELOTERO BALANCE Dermal Filler and the injection procedure include, but are not limited to:

- Facial Bruising, Redness, Swelling, Itching and Pain: I understand that there is a risk of bruising, redness, swelling, itching and pain associated with the procedure. These symptoms are usually mild and last less than a week, but can last longer. Patients who are using medications that can prolong bleeding, such as aspirin, warfarin, or certain vitamins and supplements, may experience increased bruising or bleeding at the injection site.
- 2. Rash and Skin Irritation: I understand that there is a risk of skin exfoliation at the treatment site. Also I understand it is possible for a rash to appear and for the treated area(s) to become firm to the touch
- 3. Nodules and Palpable Material: I understand that there is a risk that small lumps may form under the skin due to the BELOTERO BALANCE filler material collecting in one area. I also understand that I may be able to feel the BELOTERO BALANCE filler material in the area where the material has been injected. Any foreign material injected into the body may create the possibility of swelling or other local reactions to a filler material.
- 4. Accidental Injection into a Blood Vessel: I understand that BELOTERO BALANCE Dermal Filter and be accidentally injected into a blood vessel, which may block the blood vessel and cause damage at potentially large areas of distant tissue, or potentially a heart attack, stroke or blindness.
- 5. Infection: As with any injection procedure involving the skin, I understand that imjection of any fisher material carries the risk of infection.
- 6. **History of Herpes Infection:** I understand that there is a risk that injection of any filler material raining the risk of a recurrence of an outbreak of herpes (fever blisters/cold sores/shingles) and that the outbreak may be severe in nature. I have disclosed to the health care provider my medical history and, in particular disclosed prior herpes outbreaks.
- 7. Allergic Reactions: I understand that BELOTERO BALANCE Dermal Filler should not be used in patients with severe allergies, a history of anaphylaxis, or history or presence of multiple severe allergies or hypersensitivity to any of the ingredients in BELOTERO BALANCE Dermal Filler, especially grain positive bacterial proteins and hyaluronic acid.
- 8. Migration: I understand that BELOTERO BALANCE Dermal Filler, as with any filler material, may represent from the place where it was injected.

BELOTERO BALANCE

I have discussed the potential risks and benefits of BELOTERO BALANCE Dermal Filler with my healther give provider. I understand that there is no guarantee of any particular results of any treatment.

By signing below, I acknowledge that I have read the foregoing informed consent, have had the opportunity to discuss any questions that I have with my doctor to my satisfaction, and consent to the treatment described above with its associated risks. I understand that I have the right not to consent to this treatment and that insconsent is voluntary. I hereby release the doctor, the person performing the BELOTERO BALANCE. Dermal Filler injection and the facility from liability associated with this procedure.

Patient Signature		Witness Signature	
Patient Printed Name	et av	Witness Ponted Name	
Patrent Address		Witness Address	
Phone Number	1 + 0 S	Phone Number	11-05-19

EM03004-01



MICRONEEDLING/PRP FACIAL

BLOOD DRAW SITE: PAC # OF VIALS: 3 TREATMENT #: 1 ANESTHETIC USED: BLT 20 10 10 MICRO-NEEDLE DEPTH: 10-2.5	
ANESTHETIC USED: BLT 20 10 10 MICRO-NEEDLE DEPTH: 10-2.5	
NOTES: 3 vials of 6100d from (2) ac of arm.	
Cleansed skin with preventics. Migro needle force	
pigmentation areas. Injected 0.2 ccis of plasma on startara diagram: Pt rinsed no face wil water & soup. Applied plasma vaseline and triple untibiotic mix. Pt tolerated proced COMPLICATIONS; well.	of hor
None. Used double gloves 3 precentions	
CUNICIAN SIGNATURE: A JANGO Pro DATE: 9/20/20.	



MICRONEEDLING/PRP FACIAL

PATIENT NAME: _	D.O.B
BLOOD DRAW SITE: (P) AC #	OF VIALS: 3 TREATMENT #: 2
ANESTHETIC USED: BLT 70/10/10	MICRO-NEEDLE DEPTH: 1.0-2-5 Needle 30g x.VzIIICh
Notes: Cleaned skin Bir cream appliances; injustions on starred introder mally an more rearrant applications and part to instruct	area Michoneedling on highlighted areas with lighted planned of the planted well. Triple the permaining planner. Pt
COMPLICATIONS: NUME USED double gluves & pr	
CLINICIAN SIGNATURE PA	J DATE: 12/30/2020.



PLATELET RICH PLASMA (PRP) Informed Consent

Platelet Rich Plasma, also known as "PRP" is an injection treatment whereby a person's own blood is used. A fraction of blood (20cc) is drawn up from the individual patient into a syringe. This is a relatively small amount compared to blood donation which can remove 500cc. The blood is spun in a special centrifuge to separate its components (Red Blood Cells, Platelet Rich Plasma, Platelet Poor Plasma and Buffy Coat). The Platelet Rich Plasma and Buffy Coat is first separated and combined then activated with a small amount of calcium chloride which acts as an activation agent and scaffold to keep the PRP where the injector intends to treat. Platelets are very small cells in your blood that are involved in the clotting and healing process. When PRP is injected into the damaged area it causes a mild inflammation that triggers the healing cascade. As the platelets organize in attracting stem cells and growth factors to repair the damaged area. As a result new collagen begins to develop. As the collagen matures it begins to shrink causing the tightening and strengthening of the damaged area. When treating injured or sun and time damaged tissue, they can induce a remodeling of the tissue to a healthier and younger state. The full procedure takes approximately 45 minutes to an hour. Generally 2-3 treatments are advised, however, more may be necessary for some individuals. Touch up treatments may be done once a year after the initial group of treatments to boost and maintain the results.

PRP'S SAFETY has been established for over 20 years for its wound healing properties and *it's* proven effectiveness has extended across multiple medical specialties including cardiovascular surgery, orthopedics, sports medicine, podiatry, ENT, neurosurgery, dental and maxillofacial surgery (dental implants and sinus elevations), urology, dermatology (chronic wound healing), and ophthalmology, cosmetic surgery. PRP's emergence into aesthetics and skin rejuvenation began in 2004 in Europe, Asia, Australia, and South America in countries such as The United Kingdom, Japan, Spain, Portugal, Switzerland and Argentina to name a few. Areas typically treated for aesthetic purposes and skin rejuvenation include: Crinkling skin around the eyes, cheeks and mid-face, neck, jaw-line, chest and décolletage, back of hands and arms, lips, and to stimulate hair growth on scalp. Almost all skin tones show that PRP is safe and effective because your own enriched plasma is used.

BENEFITS of PRP: Along with the benefit of using your own tissue therefore virtually eliminating allergies, there is the added intrigue of mobilizing your own stem cells for your benefit. PRP has been shown to have overall rejuvenating effects on the skin including: improving skin texture, thickness, fine lines and wrinkles, increasing volume via the increased production of collagen and Elastin, and by diminishing and improving the appearance of scars. The most dramatic results to date have been the crepey skin problems in areas such as under the eyes, neck, and décolletage. It is not designed to replace cosmetic surgery as there are some cases where those procedures would be more appropriate. Other benefits include: minimal down time, safe with minimal risk, short recovery time, natural looking results; no general anesthesia is required.

CONTRAINDICATIONS: PRP used for aesthetic procedures is safe for most individuals between the ages of 18-80. Parental Consent required .for patients under 18. There are very few contraindications, however, patients with the following conditions are not candidates: 1) Acute and Chronic Infections 2) Skin diseases (i.e. SLE, porphyria, allergies) 3) Cancer 4) Chemotherapy treatments 5) Severe metabolic and systemic disorders 6) Abnormal platelet function (blood disorders, i.e. Haemodynamic Instability, Hypofibrinogenemia, Critical Thrombocytopenia) 7) Chronic Liver Pathology 8) Anti-coagulation therapy, 9) Underlying Sepsis and 10) Systemic use of corticosteroids within two weeks of the procedure.

PRE-TREATMENT INSTRUCTIONS For Platelet Rich Plasma (PRP)

A few simple guidelines before your treatment can make a difference

If you develop a fever, cold / flu, or develop a cold sore, blemish, or rash, etc. in the area to be treated prior to your appointment, you must reschedule (we will not treat you).

It is recommended, if you have a **special event or vacation coming** up that you schedule your treatment **at least 2 weeks** in advance (we prefer 3-4).

If you are being treated in the lip area and have a history of Herpes (cold sores) with outbreaks more than 4 times a year some practitioners recommended that you are pretreated with medication. This office recommends Valtrex 2GM the day before or the morning of the treatment and then another 2GM's.12 hours after the first dose. **Please let us know that you need a prescription if you do not have this medication on hand. **

Discontinue use of anti-inflammatory drugs (steroidal and non-steroidal) such as: Aspirin, Motrin (or any other Ibuprofen drugs) at least 3 days to 1 week before your treatment. With PRP, we "want" inflammation this is one of the mechanisms of how PRP does its work.

If you are or have been on Systemic use of Corticosteroids (steroids) within 2 weeks of treatment, we cannot treat you. Consult your physician for approval to discontinue use of steroids and receive treatment.

Discontinue use of any other blood thinning agents such as: Vitamin E, Vitamin A, Gingko Biloba, Garlic, Flax Oil, Cod Liver Oil, Essential Fatty Acids (EFA's and DHA's) etc. at least 3 days to 1 week before and after treatment to minimize bruising and bleeding.

It is **recommended that you avoid:** Alcohol, caffeine, Niacin supplement, spicy foods, and cigarettes 3 days before and after your treatment. (All of these may increase risk of bruising)

		9-29-20
Patient Name (print)	Patient Signature	Date
		912912020
Witness Name (print)	Patient Signature	Date





HOJA DE CONSENTIMIENTO Y TRATAMIENTO CON PLASMA RICO EN PLAQUETAS

Esta tecnica consiste en tomar una muestra de su propia sangre y separar sus componentes por un proceso de centrifugacion para concentrar las plaquetas en una fraccion de plasma.

El plasma rico en plaquetas (prp) obtenido se active mediante la adicion de gluconate de calcio antes de ser reinyectado. En la piel, las plaquetas liberan factores de crecimiento en su relacion biologica y una concentracion ligeramente mas alta que es normal para estimular la proliferacion celular de fibroblastos y la sintesis de matriz extracellular, que contiene proteinas tales como elastina dando las proteinas elasticas de la piel, por lo que puede haber una variacion natural en los resultados, no dude pedir una estimacion mas específica a su medico o profesional acerca de la cantidad de sesiones requeridas.

Los beneficios esperados son la mejora de la elasticidad de la piel con una suavizacion de las lineas finas y una mejora en el tratamiento PRP Tambien puede permitir el relleno de las arrugas mas profundas, como los surcos nasolabiales. Los resultados se comienzan a dar en semanas despues de la primera inyeccion, pero para obtener mejores resultados su medico o profesional tendra que ofrecer un protocolo con sesiones.

El PRP es un producto directo de su cuerpo, se espera muy pocos efectos secundarios. El PRP se utiliza en numerosos estudios para la curacion de las heridas quirurgicas y cronica sin ninguna manifestacion de efectos secundarios graves. Todavia se pueden producir casos como:

- La presencia de hematomas o rojez en los sitios de inyeccion.
- Las sensaciones de calor y la tension superficial de la piel. Estas sensaciones son transitorias debido al
 estallido de la estimulacion y desaparecen en un plazo maximo de 24 a 36 horas despues del tratamiento.

En casos muy raros y en pacientes con potencial alergico significativo, puede producirse un Edema debido a un proceso mas grande de lo normal. Asi mismo recuerda a su medico si usted tiene un historial de alergias a medicamentos u otras sustancias. El uso de PRP (plasma rico en plaquetas) de la regeneracion de la piel es estrictamente contraindicado en pacientes con CANCER cervico-faciales y en pacientes Embarazadas. El uso de PRP Tambien es contraindicado en pacientes con lesiones de la piel, pueden ser causados por proceso de proliferacion, al igual que con todos los demas tratamientos por inyecciones subcutaneas, esta contraindicado el uso concomitante con fa inyeccion.

Declaro que he sido informado por via oral, mediante la firma del medico o profesional, supuestos efectos a causa del tratamiento. He leido y entendido la informacion por escrito que figuran en este documento. He recibido respuesta satisfactoria a las informaciones que plantean en relacion con el tratamiento.

En consecuencia estoy de acuerdo para recibir tratamiento especificado en la misma.

Me comprometo informar al medico o profesional de cualquier tratamiento concomitante con otro medico y los medicamentos.

CONSIENTO

Lugar y fecha



BELOTERO BALANCE

- 9. Post-Marketing Surveillance: The following adverse events have been identified during post-approval use of BELOTERO BALANCE® Dermal Filler. Because they are reported voluntarily from a population of uncertain size, it is not always possible to reliably estimate their frequency or establish a causal connection to BELOTERO BALANCE Dermal Filler. Allergic reactions including Quincke's edoma, anaphylaxis, rash, and hives have been reported. Also reported are necrosis, inflammation, granuloma, indurations, nodules, hematoma, Tyndall effect, Cordon like effect, bumps, pustule, scaring, swelling, erythema, pain, edema, bruising, lumps, discoloration, infection, migration/displacement, asymmetry, numbness, vascular occlusion and visual disturbance.
- 10. Non-Local Adverse Events: I understand adverse events can occur outside of the direct treatment area. Such non-local adverse events, as noted in 7 of the 211 clinical study patients, included moderate hives, mild herpes simplex, mild headache, moderate headache moderate swelling to the right side of the nose, moderate cold sore, moderate lip numbness, and mild lip dryness.
- 11. Duration of Effect: I understand that the outcome of treatment with BELOTERO BALANCE Dermal Filler will vary among patients. In some instances, additional treatments may be necessary to achieve the desired outcome.
- 12. Concomitant Dermal Therapies: I understand that the safety of BELOTERO BALANCE Dermal Filler with concomitant dermal therapies such as epilation, UV radiation, laser treatment, mechanical or chemical peeling procedures, radio frequency or ultrasound-based devices used for skin tightening has not been evaluated in controlled clinical trials.
- 13. Keloids/Scarring: Lunderstand that the safety of BELOTERO BALANCE Dermal Filler in patients with known susceptibility to keloid formation or hypertrophic scarring has not been studied.
- 14. Pregnancy/Age: I understand that the safety of BELOTERO BALANCE Dermal Filler for use during pregnancy, in breastfeeding females or in patients under 21 years of age has not been studied.
- 15. Recurrent Sore Throat: I understand that the safety of BELOTERO BALANCE Dermal Filler in patients with known susceptibility to recurrent sore throat, or Osler Rendu endocarditis, has not been studied.
- **16. Annual Treatment Volume:** I understand that the safety of injecting BELOTERO BALANCE Dermal Filler in volumes greater than 6.0 mL per year has not been studied.
- 17. Interactions: I understand that the interaction of BELOTERO BALANCE Dermal Filler with drugs or other substances or implants has not been studied.
- 18. Sun Exposure: I understand sun exposure should be minimized to treated areas. This also includes UV lamp exposure and extreme cold weather, until any initial swelling and redness have resolver, and puncture sites have healed.

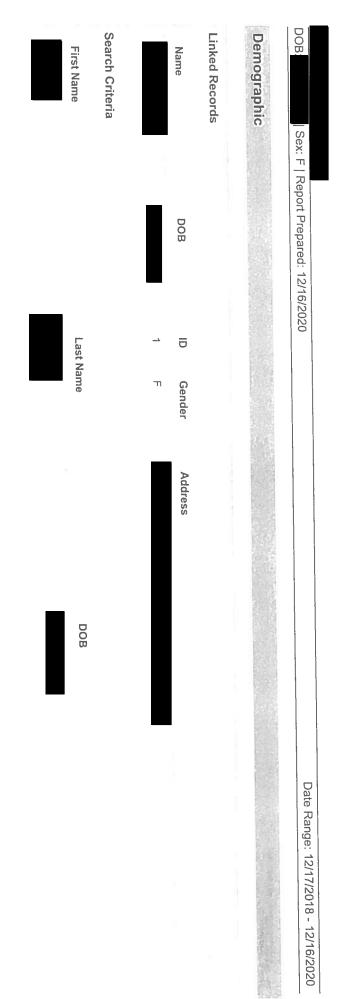
The above list is not meant to be inclusive of all possible risks associated with BELOTERO BALANCE Dermal Filler or dermal fillers in general, as there are both known and unknown side effects and complications associated with any medication or dermal filler injection procedure. Lunderstand that medical attention may be required to resolve complications associated with my injection.

11 3

Microdermabrasion Client Informed Consent Form Patient: Date: This consent form is designed to verify that you have been satisfactorily informed and educated in respect to your microdermabrasion skin care treatment, as well as its aftercare, so that you may make an educated decision as to whether to have this procedure performed. This disclosure is not meant to alarm you; it is simply an effort to make you better informed so you may give, or withhold, your consent for treatment. Please read and initial where indicated. 1. I acknowledge having been informed that this cosmetic procedure is intended to remove superficial surface layers of the skin to improve the vitality of the skin. Initial here: I understand that my skin care professional can discover other, or different conditions that may require additional or different procedures than those planned. If my skin care professional discovers such other or different conditions I will be referred to an appropriate medical care provider. Initial here: It has been explained to me that because microdermabrasion procedures are a superficial abrasion to the skin, the result of a one-time treatment is similar to a deep cleansing or polishing of the skin. I understand that in order to see significant results these treatments need to be done in a series and in combination with active ingredient skiu 4. I acknowledge that while the goal of such a procedure is the removal of damaged skin, the realistic results average at least fifty percent improvement. I acknowledge that the practice cosmetology is not an exact science and that no specific guarantees can or have been made concerning the expected result. Some clients' skin may show improvement, while others may not show marked improvement. Initial here: I acknowledge that after my microdermabrasion procedure, all treated areas may feel warm and appear sunburned or my skin may experience a wind-burned sensation. Initial here: I understand that my compliance to my after care instructions will greatly affect my final result. I acknowledge my obligation to follow the written and spoken instructions covering my pre- and post-treatment skin care I understand that multiple treatments may be required. Initial here: I understand that although rare, certain risks or complications could occur but are usually treatable and temporary. such as hyper-pigmentation, hypo-pigmentation, and scarring. Following all post procedure instructions will help 9. I acknowledge that if I am prone to Herpes (cold sores, fever blisters) that I may need a prescription for Valtrex (acyclovir) from WSWH prior to having microdermabrasion. I need to avoid treatments during a breakout. 10. I acknowledge that I have not used Accutane during the last six months. Initial here: 11. I acknowledge that I should avoid the use of glycolic and Retin-A type products the day before, the day of, and 1-3 days following treatment. Initial here: 12. Acne patients, it has been explained to me that I may experience a slight acne flare-up, and that my acne condition may temporarily look worse for a few days after a microdermabrasion treatment. Initial here: 13. I acknowledge that I have been instructed to avoid sun exposure and must wear a sun block of at least SPF 25 over the treated areas on a daily basis during my treatment series. Initial here: 14. I understand that if I have any additional questions or concerns that I should call the office immediately. Initial I have read and initialed each paragraph and have been satisfactorily informed of the benefits, risks, and complications regarding microdermabrasion. I consent to this microdermabrasion treatment today and for all subsequent Patient Signature: Witness Signature: Parent/Legal Guardian Signature (if patient is a minor

EXHIBIT 9

EXHIBIT 9



DOB:

NARXCARE SCORES

OVERDOSE RISK SCORE

ADDITIONAL RISK INDICATORS (0)

Narcotic Sedative Stimulant 040 050 000

190

(Range 000-999)

refusing to provide medications. The information on this report is not warranted as accurate or complete. or the prescriber. NarxCare scores and reports are intended to aid, not replace, medical decision making. None of the information presented should be used as sole justification for providing or This NarxCare report is based on search criteria supplied and the data entered by the dispensing pharmacy. For more information about any prescription, please contact the dispensing pharmacy

INFORMATION GRAPH

Timeline

12/16

2m

6m

Ty

Prescribers 1 - Salvador G Borrom

2y

overdose risk in the same dose-dependent manner as doses for full agonist opioids. MME = morphine milligram equivalents. LME = Lorazepam milligram equivalents. MG = dose in milligrams. thresholds meant for opioids prescribed for pain. Buprenorphine products have no agreed upon morphine equivalency, and as partial opioid agonists, are not expected to be associated with *Per CDC guidance, the MME conversion factors prescribed or provided as part of the medication-assisted treatment for opioid use disorder should not be used to benchmark against dosage

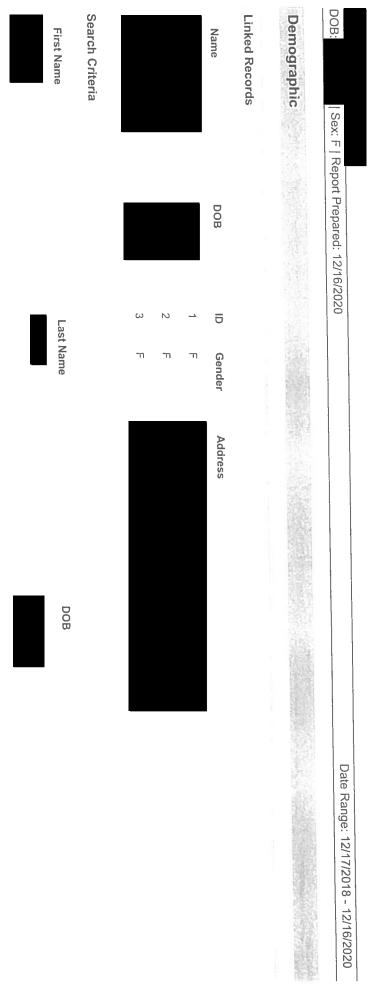
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Pharmacies												
Name		Address			City		State	Zipcode	Phone			
Santa Maria Pharmacy (8003)		3827 E Sunset Rd Ste L			Las Vegas	_	N	89120	(702) 4	(702) 474-0268		
			1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		Mary San Street							

Disclaimer

Report contents are based on data entered by dispensers and their staff, and may contain errors. The Board of Pharmacy recommends independent verification with dispensers when prudent or necessary. Willful disclosure of prescription information may be subject to disciplinary action, civil penalties or criminal action.



Risk Indicators

NARXCARE SCORES

OVERDOSE RISK SCORE

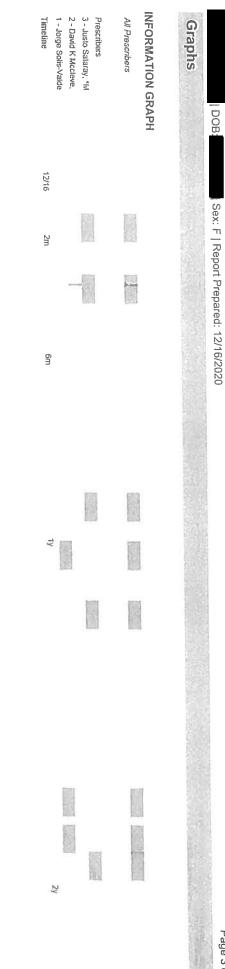
ADDITIONAL RISK INDICATORS (0)

Narcotic Sedative Stimulant 060 030 140

190

(Range 000-999)

refusing to provide medications. The information on this report is not warranted as accurate or complete. or the prescriber. NarxCare scores and reports are intended to aid, not replace, medical decision making. None of the information presented should be used as sole justification for providing or This NarxCare report is based on search criteria supplied and the data entered by the dispensing pharmacy. For more information about any prescription, please contact the dispensing pharmacy



overdose risk in the same dose-dependent manner as doses for full agonist opioids. MME = morphine milligram equivalents. LME = Lorazepam milligram equivalents. MG = dose in milligrams. thresholds meant for opioids prescribed for pain. Buprenorphine products have no agreed upon morphine equivalency, and as partial opioid agonists, are not expected to be associated with *Per CDC guidance, the MME conversion factors prescribed or provided as part of the medication-assisted treatment for opioid use disorder should not be used to benchmark against dosage

Timeline	Lorazepam MgEq (LME)	Timeline	Morphine MgEq (MME)	Timeline	Buprenorphine mg
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| Sex: F | Report Prepared: 12/16/2020

Page 5 of 6

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			Phone	de	Zipcode	State		City		Address	Adı			Name
	PAGE THE PAGE TO SERVICE T										が変える			rescribers
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	2	Comm Ins		0/0	Wal (7522)	3045192	Ju Sat	30	30.00	Phentermine 37.5 Mg Tablet	09/23/2019	09/20/2019	2	09/20/2019
	. Z	Comm Ins		0/0	Wal (7522)	3069385	Jo Sol	30	30.00	Phentermine 37.5 Mg Tablet	11/19/2019	11/15/2019	2	11/19/2019
	2	Comm Ins		0/0	Wal (7522)	3087433	Ju Sat	30	30.00	Phentermine 37.5 Mg Tablet 8 E669	01/07/2020	01/07/2020	2	01/07/2020
	Z	Private Pay		0/0	Nev (3405)	02161038	Ju Sat	30	30.00	Phentermine 37.5 Mg Tablet	08/27/2020	08/14/2020	2	08/14/2020
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(1786)													Suc	rescriptions
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1183														Summary

Jorge Solis-Valdez 216 N Lamb Blvd Las Vegas NV 89110	216 N Lamb Blvd Las Vegas NV 89110	Address City State Zipcode	
N	N	State	
	10 (702) 459-2401	code Phone	

Pharmacies

Nevada CVS Pharmacy, L.L.C. (3405)	Address 4411 E Bonanza Rd 3810 E Sunset Rd	City Las Vegas Las Vegas	State NV	Zipcode 89110 89120	Phone (702) 452-5652 (702) 450-3299
Nevada CVS Pharmacy, L.L.C. (3405)	4411 E Bonanza Rd	Las Vegas	N	89110	(702) 452-5652
Nevada CVS Pharmacy, L.L.C. (2209)	3810 E Sunset Rd	Las Vegas	N	89120	(702) 450-3299
Walgreen Co. (7522)	4470 E Bonanza Rd	Las Vegas	N	89110	(702) 531-8006
Washington Lamb Cvs, L.L.C. (0302)	4391 E Washington Ave	Las Vegas	Š	89110-5715	(702) 452-2937

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PATIENT NAME.	DATE: 06-02-2020
PHONE NUMBER:	
D.O.B.: WEIGHT: 106 1 29 y 0 PREGNANCY TEST RESULTS: Negrative MEDICATIONS: XANEX-GLPRAZOLOM 2 12 Tub YO PERCOCET OXYRODONES 35 1 Tub YO KEFLEX 120 MF. THA ZINGS 2 Tub YO PHERGANDS UI FAMETHOX AZOLE TO TUBO	NKDA- 09:68 BLOOD PRESURE: 11:13 HIGH: 145 164 SAH 98
	LOW: 90 190 1-12 94 DHERAT BEAT: 98 83. 02 Sout: 967
TIME OF MEDICATIONS GIVING: (912) a.m.	Litto Par
VASER TIME: 11:33 - 1:05 ASPIRATE TIME: 11:45 - 1:30	king on pt fibrous
AREAS LIPUSUCTIONS: TUMESCENT Mochomer (1975) 3.2 HS Arma (4000) 5000000000000000000000000000000000	ASPIRATION FAT 1400cc 1400cc 1400cc 1400cc 1400cc 1400cc 1400cc 1400cc 1400cc
Procedure: Lipo Suction w 1 grafi OBSERVACIONES: Pl fol. well Breasts w/g librous. No graff to breast. Pl beft Atable, Atox3 wbin.	ala ctor hea bilaterally oftenascent.
	Hankins PA Bissome NSBME 0185

Appointment Cancellation Policy For Vida Spa

The fees quoted for cosmetic procedures and surgeries are inclusive of the following:

Pre-operative exam, surgeon fees, materials, anesthesia, operating facility, and post-operative visits.

If additional corrective surgery or elective aesthetic correction is desired, there will be additional surgeon, facility, and material fees incurred.

In office treatments such as Botox, Voluma, Juvederm, Dysport, Restylane, or other filler materials, chemical peels, Asclera therapy, and other similar therapies are priced on a pretreatment basis or package option and additional cost is possible based on consumption.

Office treatments and services are payable in full at the time of your appointment.

If you elect to have a procedure or surgery and would like to secure the date that works best for your schedule, a 50% deposit of the surgeon fees is required to secure your date. The full balance is due two weeks prior to surgery. If your surgical booking is within two weeks of surgery, then payment is due in full.

There is a non-refundable administrative cancellation fee of \$1000 if you decide to cancel your procedure or surgery once your date has been secured and payment is accepted in our office. Additionally, should your scheduled procedure/surgery be cancelled, the following applies:

Cancellation 8-14 days prior to scheduled procedure/surgery date will result in 25% loss of fees. Cancellation 7-2 days prior to scheduled procedure/surgery date will result in 50% loss of fees. Cancellation made the day before or day of scheduled procedure/surgery date will result in 100% loss of fees.

By signing this form, I acknowledge that I understand The Vida Spa's Patient Policies. I agree to be personally responsible for all payments due for my medical/surgical care.

	5-29-20
Patient/Responsible Party's Signature	Date
·	
Print Name	

Vida Spa 3225 S Rainbow Blvd, #107 Las Vegas, NV 89146

Consent for Surgery and Procedures

desire the doctor, PA, and such qualified nurses and assistants as may be assigned, to perform the elective procedure(s) of: // // // // // ///
Tobal tion and a win with the winds
A facility of war by for your of the same
The nature and purpose of the operation(s) and procedure(s), possible alternative methods of treatment, including
to treatment/surgery, risks and possible complications have been fully explained to me by Vida Spa, doctor, PA, and such
nurses and assistants as assigned. I have been advised that all surgery involves general risks, including but not limited to
bleeding, infection, nerve or tissue damage, and rarely, cardiac arrest, death, or other serious bodily injury. I acknowledge
that no guarantees or assurances have been made as to the results that may be obtained.
I understand that anesthesia may be given, and that it, too, carries risks. I consent to the administration and use of
anestnesia as the doctor, PA, and such qualified nurses and assistants as may be assigned, and to the use of such anesthesia
as the doctor, PA, and such qualified nurses and assistants as may be assigned, may deem advisable.
It has been explained to me that during the course of the operation unforeseen conditions may be revealed that
necessitate an extension of the original procedure, and I hereby authorize the doctor, PA, and such qualified nurses and
assistants as may be assigned, to perform such procedures as are necessary and/or desirable, including but not limited to the
service of pathologists, radiologists, laboratory, or medical centers. The authority granted in this paragraph shall extend to
treating conditions that are not known to my providers at the time the operation commences.
I understand that photography is important in planning and evaluating surgery, and I give permission for
photographs and or videos to be taken before, during, and after my surgery and/or procedure. I give consent to use such media for:
(Check all you consent to)
I agree to keep Vida Spa, the doctor, PA, and such qualified nurses and assistants as may be assigned, informed of
any change in my permanent address so they can inform me of any important new findings relating to my surgery and/or procedure(s). I further agree to cooperate with in my aftergree until Lam displaced from soil to the soil
procedure(s). I further agree to cooperate with in my aftercare until I am discharged from said surgery and/or procedure(s) care.
In signing this consent, I hereby certify that I understand the risks, benefits, and alternatives to my procedure(s) are
that I have discussed them with the doctor and/or PA. I, the patient have been advised and understand that there are inheren-
risks in the medical services to be provided, which I have voluntarily elected to undergo. I, the patient, forever release and
forever discharge the doctor, PA, nurses, assistants, Vida Spa, shareholders, directors, officers, employees, agents, and
representatives, whatsoever, from and hereby waive all actions, lawsuits, obligations, damages, losses, and claims,
whatsoever arising out of or relating to, directly or indirectly, the medical services to be provided including, without
limitation, as a result of the actions, including negligence, of the doctor, PA, nurses, assistants, Vida Spa, its shareholders,
directors, officers, employees, agents, and representatives.
The patient acknowledges, by signature below, understanding of, and has had the opportunity to discuss the
provisions of this agreement, including the release from liability, with his/her counsel, whether or not they have done so.
prior to the execution of this agreement.
Please do not give your permission or sign this consent form if you have any questions regarding your
procedure(s). Please advise a staff member of these questions or concerns so arrangements can be made for the doctor or P
to discuss them with you.
Signature: _/
Signature:
Printed name: Relationship to patient:
Witness:



Patient Profile								
Name:				Date:	29-20]		
Address:				City:	,			
State: _	Zip:		-	Home Phone	:_			
Work Phone:				Cell Phone:				
Age: 29	DOB:			Preferred Co				
Occupation: 1	SKP			Employer:				
SSN:				Driver's Lice	ense:			
Email:								
Medical Question	onnaire		(D)					
Medical History Diabetes High Blood Pre Heart Attack Heart Disease Multiple Scleros Epilepsy Hepatitis Bowel Problems Prostate Cancer Sexually Transr Blood Transfusi Tuberculosis Other Current medical	ssure sis mitted	Yes	(2)2)2(2,2,2,2)2(2)	High Cholest Coronary He Blocked Arte Stroke/TIA Parkinson's of Liver Disease Kidney Disease Prostate Disease Peyronie's D HIV Infectio Major Depre Bleeding Disease tives, sedatives, vitamine	art Disease ery disease e ase ease (BPH) visease n/AIDS ssion sorder	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes	(3,2,5,5,5,5,5,5,5,5,5,5,5,5,5,5,5,5,5,5,	
Surgery Heart Prostate Bowel Hernia Scrotum/Test Other	Yes Yes Yes Yes Yes	No.		Blocked Artery Penis Bladder Vasectomy Spine	Yes Yes Yes Yes Yes	(5/5/5/5/5)		PROF & ST. Prince - And

Previous Urolog	y Proble	ms						
Kidneys	Yes	No	Penis		Yes	No		
Bladder Prostate	Yes Yes	(No	Testi		Yes	No		
Trostate	1 65	No	Urine	2	Yes	No		
<u>Injuries</u>						200		
Head	Yes	(N_0)	Back		Yes	Nò		
Pelvis Other	Yes	(No:	Penis	5	Yes	No		
Other								
History of Recre	eational .	Activities						
Alcohol?	No		low Often?_					
Smoking?	No		low Much?_					
Recreational Dr	ug: Mari	juana, Cocai	ne, Meth, etc	:? No Y	es. How Ofte	en?		
Family History								
Diabetes Cancer of the Pr	rostato			ature Heart A		(No)		
Cancer of the Fi	ostate	Yes _	10 High	Blood Pressu	re d'es	No		
Social History:								
Marital Status:	Singlè	Married	Divorced	Separated V	Vidowed			
Di				•				
Physical Activit	ty:	Inactive	(Light) N	Moderate F	leavy			
Allergies								
Have you ever l	nad an al	lergic reaction	n to any me	dications?	es (No)			
If was places		4*1			***************************************			
If yes, please pr	ovide de	tans:						
Diago war did.								
Please provide	your curi	rent physiciai Name	<u>1S:</u>	Phone	Snoo	iolts	Lout Winit	
				HOHE	Spec	iaity	Last Visit	
Family Physicia	an	Sola	ray					
Specialist			1					
opeciansi								
Specialist		-						
							Section 19 19 19 19 19 19 19 19 19 19 19 19 19	
General Surg								
DOB:		_Age:	Q _Date	5-29	20 R	eterring	Doctor:	
		(Chief Com	plaint:			Ht:	
Vital Signs:	lemp:		HR:	BP: _		RR:	Ht:	
Wt:	Me	dication All	ergies:	NOnz				

Medication Dose Frequency
ledication Dose Frequency Social History: Occupation:
larital Status: Single Married Divorced Widowed Tobacco Use: No Yes (If yes, # of packs/day # years) Caffeine Use: No Yes (If yes, check all that apply: Coffee Tea Soda
Ilcoholic beverage consumption: No Yes (If yes, how much and
ften) Medical History: HTN Heart Disease Diabetes Stroke
nxiety Depression Asthma GERD Cancer Other:
Surgica Surgica
listory: Appendectomy Cholecystectomy Thyroidectomy Hemorrhoidectomy Mammogram lysterectomy Breast Surgery Tubal litigation Colonoscopy Hernia Repair (location/type)
Other:
Family History: Please describe any additional problem/concerns which you think the Physician should be made aware of: 人心
Diabetes Heart Disease HTN Cancer Other Mother Father Sister Brother Grandfather Grandmother Aunt Uncle

Patient Information

Patient Name	2 '					
Address:_		Phone			organization (g)	
		Emerger	ncy Contact:_			
Weight: / (<u>()</u> kg	lbs Heigl	nt: BN	11Age: <u>2</u>	G (DOB)Gender: F
Allergies						
Medication	Dose Fr	equency			Dose	Frequency
Social History:						mana_
Occupation:	W 0 W	Marit	al Status: 🔘	Single \bigcirc Mai	rried OE	Divorced OWidowed
Tobacco Use:	No Yes (If)	es, # of pack	s/day	# years)	
Caffeine Use: O	res (if y	es, check all t	that apply:	Coffee Te	a Sod	3)
Surgical History:	consumption:	No Yes (I	f yes, how mud	ch and often_)
	Chalaguata			_		
☐ Appendectomy	Cholecystecto	my Lihyro	idectomy []	lemorrhoidect	omy 🗀 N	/lammogram
☐ Hysterectomy	Location throat	LI lubal litig	jation []Colo	noscopy		
☐ Hernia Repair (☐ Other:		**************************************				
and all the barriers						
Family History	y: Has anyone in your fa	mily had any of the	following conditions	s? (Check if yes, ar	nd indicate rel	ationship to you)
Colon, Rectum, A	Anal, Stomach, Breast,	☐ Anemla_	Man			Man
Prostate, Uterus	, Ovaries, Thyrold, Lung		s			
Blood, Lymphom		i	ase	_ Hepatitis_		The state of the s
Other		Stroke		_ Other		

BLEEDING PROBLEMS DO YOU BRUISE OR BLEED EASILY? YES NO (WI					
EXPLAIN (WI	TH CUTS /	TOOTH EXT	RACTIONS /	PREGNANCY / SURGERY)	
A CAN MANUAL AL ACLA					
DO YOU HAVE A FAMILY HISTORY OF BLEEDING PROBLEMS					
DIFFICULTIES WITH LOCAL OR GENERAL ANEST	IESIA				Landan de la constitución de la
EXPLAIN					
ELAUP TICAL PROPERTY OF THE PR				N Secretaria de como de ser de	have the summation problem are some $M_{\rm p}$ (λ , λ , λ
HAVE YOU EVER HAD A BLOOD TRANSFUSION?	YES	(NO)			
ARE YOU PREGNANT?	1/170				
At the Alpha p attention on the decision and the decision	YES	(NO)			
HAVE YOU EVER HAD, HAVE OR BEEN EXPOSED TO	O (PLEAS	SE CIRCLE	YES OR I	iu)	
INTRAVENOUS DRUGS		YES	(NO')	HEPATITIS	
YES (NO THE TRIBETIONS DISEASES		YES	(NO)	HIV / AIDS	
F YES TO ANY EXPLAIN		YES	(NO)	LIVER TRANSPLANT	
	,				4 4 MAR. 17 1
The second secon	· · · · · · · · · · · · · · · · · · ·				
Review of Systems: Do you currer	aved vitr	inv of the fe	Herries	- 4	
General: Nothing in this group	my nave a	in y or the R	Card	nploms or conditions (Check if yes) lovascular: [-]-Nothing in this group	
☐ Weight loss – How muchlbs			1		
Loss of Appelite			- 1	est pain	
[] Fever				Ipitations	
Chitts			1	art valve problems	
☐ Night Sweats			1	If pain with walking	
☐ Fainting Spells			Le	g swelling	lilli-
Eyes: [Nothing in this group			Pass	ivelana FD hl. ii	
				ratory: [5] Nothing in this group	
☐ Eye disease or injury			j	ronic cough	
☐ Wear glasses or contacts			- 1	ughing up blood	
☐ Blurred or double vision			1	ort of breath with activity	
Ear, Nose, Mouth, Throat: [] Nothing in	this aroun			ort of breath lying flat	
☐ Hearing loss	3		1	eezing	
Ear ache / infection			☐ Asi		1
[] Ringing in ears				nchitis	
☐ Nose Bleeds			∐ Pn	eumonia	
☐ Bleeding gums			Musc	Joskeletal: Mothing in this group	
☐ Mouth sores			☐ Joi		
☐ Sore throat			rthr	•	
Recent voice change			□ Вас		
Runny nose / cold			i	scle weakness	
Sinus problems			1	pain with walking	Lift to the state of the state
□ Neck stiffness / pain				pain at rest	
☐ Enlarged neck glands / massas			_	ken bones	1

Digestive: ☐ Nothing in this group	Neurological: Nothing in this group
Loss of appetite	☐ Frequent headaches
☐ Difficulty swallowing	☐ Migraines
Early satiety (fill up easy)	☐ Weakness
Heartburn -	☐ Seizures
☐ Nausea	☐ Stroke
☐ Vomiting	☐ Paralysis
☐ Diarrhea	☐ Decreased sensation
☐ Constipation	☐ Difficulty with speech
☐ Blood in stool	☐ Dizziness
☐ Dark, tarry stools	
☐ Abdominal pain	Psychlatric: Nothing in this group
☐ Painful bowel movements	Anxiety
☐ Poor control of BMs, urgency	Depression
	☐ Mood swings
Urinary: Nothing in this group	Phobias, fears
☐ Burning with urination	☐ Panic attacks
☐ Weak urine stream	Sulcide thoughts or attempts
☐ Blood in urine	
☐ Gas or stool in urine	Endocrine: Nothing in this group
☐ Poor control, leakage of urine	☐ Heat or cold intolerance
☐ Kidney stones	Excessive thirst
☐ Prostate problems	Excessive urination
☐ Testicular mass	Excessive Sweating
Get up at night to urinate - Number of times per night	
Gynecologic (female): Nothing in this group	Hematologic, Lymphatic: [] Nothing in this group
☐ Irregular periods - Last period:	☐ Prior blood transfusion
Abnormal vaginal discharge	☐ Easy bleeding or bruising
	Low red blood cell count (anemia)
Breast: Nothing in this group	Low white blood cell count
☐ Breast lump	☐ Prolonged bleeding with cuts, surgery
☐ Breast pain	Swollen glands
☐ Nipple discharge	☐ Blood clots
	Use of blood thinners
Skin: Nothing in this group	Swollen lymph nodes
☐ Rash	
☐ Skin infections	Allergic, Immunologic: Nothing in this group
☐ Uicers or sores	☐ HIV infection
☐ Yellowing of the skin	☐ Hepatitis
☐ Eczema, psoriasis, other	Imune deficiency
☐ Pyoderma gangrenosum, erythema nodosum	Antibiotics needed for dental work



PASER LIPO INFORMED CONSENT

This is an informed-consent document that has been prepared to help educate you on the VASER Lipo procedure, its risks, and alternative treatment.

It is important that you read this information carefully and completely. Please initial each page, indicating that you have read the page, and sign the Consent for Surgery as proposed by your surgeon.

VASER Lipo is a surgical technique to remove unwanted deposits of fat from specific areas of the body, including the face and neck, upper arms, upper and lower back, abdomen, buttocks, hips, inner and outer thighs, knees, calves, and ankles. This is not a substitute for weight reduction, but a method for removing localized deposits of fatty tissue. VASER Lipo may be performed as a primary procedure for body contouring or may be combined with other surgical techniques.

The best candidates for VASER Lipo are individuals of relatively normal weight who have excess fat in particular body areas. Having firm, elastic skin will result in a better final contour after lipoplasty. Skin that has diminished tone due to stretch marks, weight loss, or natural aging will not reshape itself to the new contours and may require additional surgical techniques to remove and tighten excess skin. Body-contour irregularities due to structures other than fat cannot be improved by this technique. Lipoplasty itself will not improve areas of dimpled skin known as "cellulite".

The VASER Lipo procedure is performed utilizing advanced proprietary technology. A patented grooved solid metal probe is first inserted through one or more small skin incisions. Ultrasonic energy emitted from the sides and end of the probe as it is passed back and forth breaks down fatty deposits. A hollow metal surgical instrument known as a cannula is then inserted and is directed through the area of emulsified fat cells. The cannula is attached to a vacuum source, which provides gentle suction to remove the emulsified fat. Because the VASER Lipo procedure is unique in that it first targets and dissolves fat cells and then draws out emulsified fat, leaving the collagen matrix intact, surgical trauma, complications and the potential for post-operative pain and bruising are minimized while skin retraction is optimal.

VASER Lipo may be performed under local or general anesthesia and requires the infiltration of fluid containing dilute local anesthetic and epinephrine into areas of fatty deposits. This technique can reduce discomfort at the time of surgery, as well as reduce post-operative bruising.

Support garments and dressings are worn after surgery to control potential swelling and promote healing, to provide comfort and support, and to help skin better fit new body contours. Your surgeon may recommend that you make arrangements to donate a unit of your own blood that would be used if a blood transfusion were necessary after surgery.

ALTERNATIVE TREATMENT

Alternative forms of management include not treating the areas of fatty deposits, and diet and exercise regimens that may be of benefit in the overall reduction of excess body fat. Direct removal of excess skin and fatty tissue may be necessary in addition to lipoplasty in some patients. Risks and potential complications are associated with alternative forms of treatment that involve surgery.

Patient Initials:



RISKS AND SIDE EFFECTS

Every surgical procedure involves a certain amount of risk, and it is important that you understand the risks involved with the VASER Lipo procedure. An individual's choice to undergo a surgical procedure is based on the comparison of the risk to potential benefit. Although the majority of patients do not experience these complications, you should discuss each of them with your surgeon to make sure you understand the risks, potential complications, and consequences of VASER Lipo.

Patient Selection: Individuals with poor skin tone, medical problems, or unrealistic expectations may not be candidates for VASER Lipo.

Allergic Reactions: Rarely, local allergies to tape, suture material, or topical preparations utilized in hipoplasty procedures have been reported. More serious systemic reactions due to drugs administered during surgery and prescription medicines may require additional treatment.

Asymmetry: Due to factors such as skin tone, bony prominence, and muscle tone, which can contribute to normal asymmetry in body features, it may not be possible to achieve symmetrical body appearance through lipoplasty procedures.

Bleeding: While unusual, it is possible to have a bleeding episode during or after surgery. Should post-operative bleeding occur, it may require emergency treatment to drain accumulated blood or require a blood transfusion. Non-prescription herbs and dietary supplements can increase the risk of surgical bleeding. Do not take any aspirin or anti-inflammatory medications for 2 weeks before surgery, as this may increase the risk of bleeding. Please review our Medication Alert for products and ingredients to be avoided for 2 weeks prior to and 2 weeks following your scheduled VASER Lipo procedure, and consult your doctor before taking anything.

Change in Skin and Skin Sensation: A temporary decrease in skin sensation may occur following VASER Lipo. This usually resolves over a period of time. Diminished or complete loss of skin sensation that does not totally resolve could potentially occur, as it infrequently has with various lipoplasty procedures.

Chronic Pain: Chronic pain and discomfort following VASER Lipo is unusual, but possible.

Infection: Infection is uncommon following this type of surgery. Should an infection occur, treatment with antibiotics or additional surgery may be necessary. Although extremely rare, life-threatening infections such as toxic shock syndrome could occur after lipoplasty surgery, regardless of the technology utilized.

Pulmonary and Systemic Complications: In extremely rare cases, fat droplets could become trapped in the lungs to create a possibly fatal complication called fat embolism syndrome. Pulmonary complications may occur secondarily to blood clots (pulmonary emboli) or partial collapse of the lungs after general anesthesia. Should either of these complications occur, you may require hospitalization and additional treatment. In some circumstances, pulmonary emboli can be life-threatening or fatal.

Long-term Effects: Subsequent alterations in body contour may occur as a result of aging, weight loss or gain, pregnancy, or other circumstances not related to VASER Lipo.

Patient Initials:



Scarring: Although the incisions created for VASER Lipo are minimal and good wound healing after a surgical procedure is expected, abnormal scars may occur within the skin and deeper tissues in rare cases. Such scars may be unattractive and of a different color than the surrounding skin. Additional treatments, including surgery, may be necessary to treat abnormal scarring.

Seroma: While VASER Lipo has reduced the incidence and severity of seromas associated with lipoplasty procedures, such fluid accumulation is possible and could require additional treatments or surgery to promote drainage.

Bruising and/or Swelling: Although VASER Lipo typically reduces or eliminates bruising and swelling normally resulting from lipoplasty procedures, bruising and swelling may occur and, in rare situations, persist for extended periods of time.

Skin Contour Irregularities: Since VASER Lipo selectively targets fat cells, leaving other essential tissues intact, skin contour irregularities and depressions in the skin are unlikely but possible. Visible and palpable wrinkling of skin can occur, particularly when large quantities of fat cells are removed and/or the skin is lacking good elasticity. Post-operative skin contour irregularities could necessitate additional treatments including surgery.

Skin Loss: Additional treatments including surgery could be necessary in the unlikely event that skin loss occurs following your VASER Lipo treatment.

Surgical Anesthesia: All forms of surgical anesthesia or sedation, whether administered locally or generally, carry risks including the possibility of complications, injury, and even death. You will probably be required to sign a separate anesthesia consent form in preparation for your surgery.

Surgical Shock: VASER Lipo could conceivably cause severe trauma, particularly when multiple or extensive areas are treated in a single session. Although serious complications are a rarity, infections or excessive fluid loss can lead to severe illness and even death. Should surgical shock occur following your VASER Lipo treatment, hospitalization and additional treatment would be necessary. Individuals undergoing VASER Lipo procedures to remove large volumes of fat are at a greater risk of complications. Patients contemplating large-volume lipoplasty (greater than 5000 cc removed) may be advised to undergo post-operative monitoring and aftercare that involves overnight hospitalization.

Lidocaine Toxicity: There is the possibility that large volumes of fluid containing dilute local anesthetic drugs and epinephrine that is injected into fatty deposits during surgery may contribute to fluid overload or systemic reaction to these medications. Additional treatment including hospitalization may be necessary.

Ultrasonic Technology: Risks associated with the use of ultrasound in lipoplasty treatments include the aforementioned and the following specific risks:

Burns: Ultrasonic energy may produce burns and tissue damage if the probe touches the undersurface of the skin for prolonged periods of time. If burns occur, additional treatment and surgery may be necessary.

Patient Initials:



Probe Fragmentation: Ultrasonic energy produced within the probe(s) may cause disintegration (fragmentation) of the surgical instrument. The occurrence and effect of this is unpredictable. If this should occur, additional treatment including surgery may be necessary.

Unknown Risks: The long term effect on tissue and organs of exposure to short-duration, high-intensity ultrasonic energy is unknown. The possibility exists that additional risk factors resulting from the use of ultrasound in VASER Lipo could potentially be discovered.

Other: While we have attempted to assist you in building realistic expectations for your VASER Lipo treatment, you may be disappointed with your surgical results. However infrequent, it may be necessary in your case to perform additional surgery to improve results.

ADDITIONAL SURGERY NECESSARY

There are many variable conditions in addition to risk and potential surgical complications that may influence the long term result of VASER Lipo. Even though risks and complications are unusual, the risks cited previously are particularly associated with lipoplasty procedures utilizing suction and/or ultrasound technologies. Other complications and risks can occur but are even more uncommon. If complications should occur, additional surgery or other treatments may be necessary. The practice of medicine is not an exact science. Although good results are expected, there is no guarantee or warranty expressed or implied on the results that may be obtained.

FINANCIAL RESPONSIBILITIES

The cost of surgery involves several charges for the services provided. The total includes fees charged by *your* doctor, the cost of surgical supplies, anesthesia, laboratory tests, and possible outpatient hospital Charges, depending upon where the surgery is performed. Due to the proprietary nature and expense of the technology utilized, your bill may reflect a separate and additional fee for the use of VASER equipment specific to your procedure. Based upon whether the cost of surgery is covered by an insurance plan, you will *be* responsible for necessary copayments, deductibles, and charges not covered. As an elective, cosmetic procedure, VASER Lipo is not typically covered by insurance, placing full responsibility for payment upon the patient. You may incur additional costs should complications develop from the surgery. Secondary surgery or hospital day-surgery charges incurred due to remedial surgery are also the responsibility of the patient.

Patient Initials:



DISCLAIMER

Informed-consent documents are used to communicate information about the proposed surgical treatment of a disease or condition along with disclosure of risks and alternative forms of treatment(s). The informed consent process attempts to define principles of risk disclosure that should generally meet the needs of most patients in most circumstances.

However, informed consent documents should not be considered all inclusive in defining other methods of care and risks encountered. Your surgeon may provide you with additional or different information that is based on all the facts in your particular case and the state of medical knowledge.

Informed-consent documents are not intended to define or serve as the standard of medical care. Standards of medical care are determined on the basis of all of the facts involved in an individual case and are subject to change as scientific knowledge and technology advance and as practice patterns evolve. It is important that you read the above information carefully and have all of your questions answered before signing the the next page.



I have received and read the information: VASER® Lipo Informed Consent

I understand that VASER Lipo is an elective surgery procedure to remove body fat from specific area(s) of the body.

The procedure has been explained to me in a way that I understand. I have had the opportunity to ask questions, and my questions have been answered. Alternative methods of treatment have been discussed with me.

I acknowledge that no guarantee has been given by anyone as to the results that I may obtain. Although a good result is expected, I understand that there are risks to the procedure or treatment proposed, as detailed in the preceding information pages.

I consent to the administration of such anesthetics considered necessary or advisable. I understand that all forms of anesthesia involve risk and the possibility of complications, injury, and sometimes death.

For purposes of advancing medical education, I consent to the admittance of observers to the operating room.

I consent to the disposal of any tissue, medical devices or body parts which may be removed.

I authorize the release of my Social Security number to appropriate agencies for legal reporting and medical device registration, if applicable.

Having discussed the reasonable expectations of the VASER Lipo procedure with me and answered all of my questions to my satisfaction, I hereby authorize and such assistants as may be selected to perform VASER Lipo and any other procedure(s) that in their judgment may be necessary or advisable should unforeseen circumstances arise during surgery.

With my signature below I hereby consent to having VASER Lipo and to the above.

Please rewrite in your own handwriting: "I understand that the practice of medicine is not an exact science and although good results are expected, there can be no guarantee as to the results."

Patient Signature	'	14	Date 5-29-20

Patient Initials: \(\lambda \)



NSBME 0200

I certify that I, and/or a member of Vida Spa staff, have discussed all of the above with the patient and answered all questions regarding the VASER Lipo procedure. I believe the patient fully understands and all questions have been answered.

Clinician Signature

Clinician Signature	Date
I am a smoker of tobacco:	
I understand that tobacco smoking increase not possible, to drastically reduce the amou weeks after my surgery.	es health risks. Doctor and staff have advised me to stop smoking and, if that is ant of my smoking, and to discontinue all smoking for two weeks before and two
It has been explained to me that there is de this can cause a delay in wound healing as	cereased circulation secondary to smoking of tobacco and/or marijuana and that well as skin breakdown, skin loss and scarring.
As a smoker, I understand that the surgery these complications, which may still occur	will have to be more conservative and less aggressive than usual to try to avoid , despite the doctor's best efforts to avoid them.
This has been fully explained to me and 1 smoking habits.	relieve Vida Spa from any responsibility related to the increased risks from my
Patient Signature	Date 5-29-20
I am a non-smoker of tobacco:	
Patient Signature	
I do not use social drugs.	_
Patient Signature	
Patient name (please print): _	
DOB: _	
Requested By:	
Patient Initials: (,)/	7



I, the above-named patient, hereby consent that photographs, videotape, and/or computer imaging may be taken of me or of parts of my body under the following conditions:

Pre- and post-operative photographs will be taken of my treatment for record purposes. The photographs will be taken by my physician or a photographer approved by my physician. I understand that these photographs will be the property of the attending physician and Vida Spa.

I understand that all computer imaging viewed is only a representation of the result that could be achieved through this procedure and that imaging is used as an educational tool to benefit the patient without guarantee of any result.

I have had the opportunity to discuss this consent with my surgeon and agree that all of my questions have been answered. This authorization is granted in furtherance of medical education and other good and valuable consideration and as a voluntary contribution. I hereby waive all rights I might have to photographs, videotape, and computer images and do hereby release, discharge, and save harmless Vida Spa and their employees and agents from all claims and liabilities whatsoever in law and in equity arising from such use.

I have read and fully understand and consent to all the above items contained in this form.

Patient Signature _	_	Date _	5-29-20
Patient Signature _		Date _	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \

MOJAVE HEART AND VASCULAR GROUP SALVADOR G. BORROMEO, M.D. DEA # BB3661279 LIC. # 8770 NPI # 1669461919 4200-A W. CHARLESTON BLVD. LAS VEGAS, NV 89102 (702) 824-2307 TEL. (800) 579-9591 FAX

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9J26IM**2124750**

Sarta Maria Pharmacy

3827 E. Sunset Road, Unit L Las Vegas, NV 89120 Phone: (702) 474-0268 Fax: (702) 474-0274 Delivered To:

3225 S RAINBOW BLVD LAS VEGAS NV 89146 (702) 237-0167

Rx Delivery Receipt 6/1/2020 4:56:42 PM

	RxDate Drg Name	Qty	Pkg	Due
64633	06/01/2020 PROMETHAZINE 25 MG TABLET	10	1	\$10.00
: 64634	06/01/2020 SULFAMETHOXAZOLE-TMP DS TABLET	20	1	\$10.00
: 64631	06/01/2020 OXYCODONE-ACETAMINOPHEN 5-325	12	1	\$10.00
64632	06/01/2020 ALPRAZOLAM 1 MG TABLET	4	1	\$5.00
				\$35.00
Patient/Caregiver/Relation Name	() Self () Caregiver () Parent () Sibiling () Child () Othe	rs	_	
Signature X	Date / Time			
Driver:jq/JQ x Comments/Notes :				
Any Questions or concerns? Please of	contact us at (702) 474-0268.			
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I Authorize the release of medical or other inforantion necessary to process the claim.

I Also Request the payment of benefit to: Santa Maria Pharmacy

I Acknowledge the receipt of the following:

- Bill of Rights
- Consent of Pharmacy delivery service/assignment of benefits
- Notice of privacy practice
- Patient's Satisfaction survey



Log #: 262654

Santa Maria Phanilary 702-414-0268 236.1 April - 1. 1911 1) Percocet 5/325 + 70 Q 460 pm #12 (2) Xanax 1.0mg j. po Q 6-8" pm # #4 3 Phenergan 25mg/170 Q (m # 10 A) Backon 55 - PO BID #20 Dr. Salvador Forromeo MD Dea 1333/4/279 Liv 8770 4200-A W. Charleston Blue. LN,W 89102

Vida Spa 702-202-3050

165 lbs = 75 kg × 50°= 3750 mg = 20 ms/a = 187.5 187.5 +4 = 46.9 cc/bag x4 bagp

Percent 5/325mg 1: PO 9:45 1: PO

YOUNGX LUNG TO PO 9:45 1: PO

Phenergan Zong Tipo

Keftex 500mg 7: PO

Backsin 25 7: PO

EXHIBIT 10

EXHIBIT 10

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PATIENT NAME:		DATE: 06/	03/2020	
		/		
PHONE NUMBER:	-	YS 1317	Set 961. BP 99/57 Sets 961 BP 83/46	HR67 RIL
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MOJAVE HEART AND VASCULAR GROUP SALVADOR G. BORROMEO, M.D. DEA # BB3661279 LIC. # 8770 NPI # 1669461919 4200-A W. CHARLESTON BLVD. LAS VEGAS, NV 89102 (702) 824-2307 TEL. (800) 579-9591 FAX

(1927) 524-2307 FEL. (800) 579-9591 FAX
NAME _
ADDRESS DOB
PATE 121211
Percocet 5/3257-7004-60-12
Xanax long TPO Q68pm #4
thenergain 25mgt-tipo alogantio
Backom DSTPOBID XICK #20

Refill NR 1 2 3 4

To ensure brand name dispensing, prescriber must handwrite "Dispense As Written" on the prescription. 000571

9J26IM**2124750**

Santa Maria Pharmacy

3827 E. Sunset Road, Unit L Las Vegas, NV 89120 (702) 474-0268 Fax: (702) 474-0274

Delivered To:

3225 S RAINBOW BLVD # 107 LAS VEGAS NV 89146 (702) 202-3050

Rx Delivery Receipt

	0/2/2020 5:03:26 PIVI			
#X# Pathena	Rodate Org Name	City	File	- Đượ -
2: 64682 2: 64679 3: 64681	06/02/2020 SULFAMETHOXAZOLE-TMP DS TABLET 06/02/2020 OXYCODONE-ACETAMINOPHEN 5-325 06/02/2020 PROMETHAZINE 25 MG TABLET	20 12 10	1 1 1	\$10.00 \$10.00 \$10.00
Patient/Caregiver/Relation Name Signature X Driver:JQ/MM x Comments/Notes :	_ () Self () Caregiver () Parent () Sibiling () Child () Others_ Date / Time			\$30.00
The enclosed prescription(s) are being deliver our Pharmacist about your medication(s). Ple consultation. Any Questions or concerns? Please contact	red to you on behalf of Santa Maria Pharmacy. You are entitl ease contact us at (702) 474-0268 during normal business ho us at (702) 474-0268.	ed to cor ours for a	nsult wit	th

I Authorize the release of medical or other inforamtion necessary to process the claim.

I Also Request the payment of benefit to: Santa Maria Pharmacy

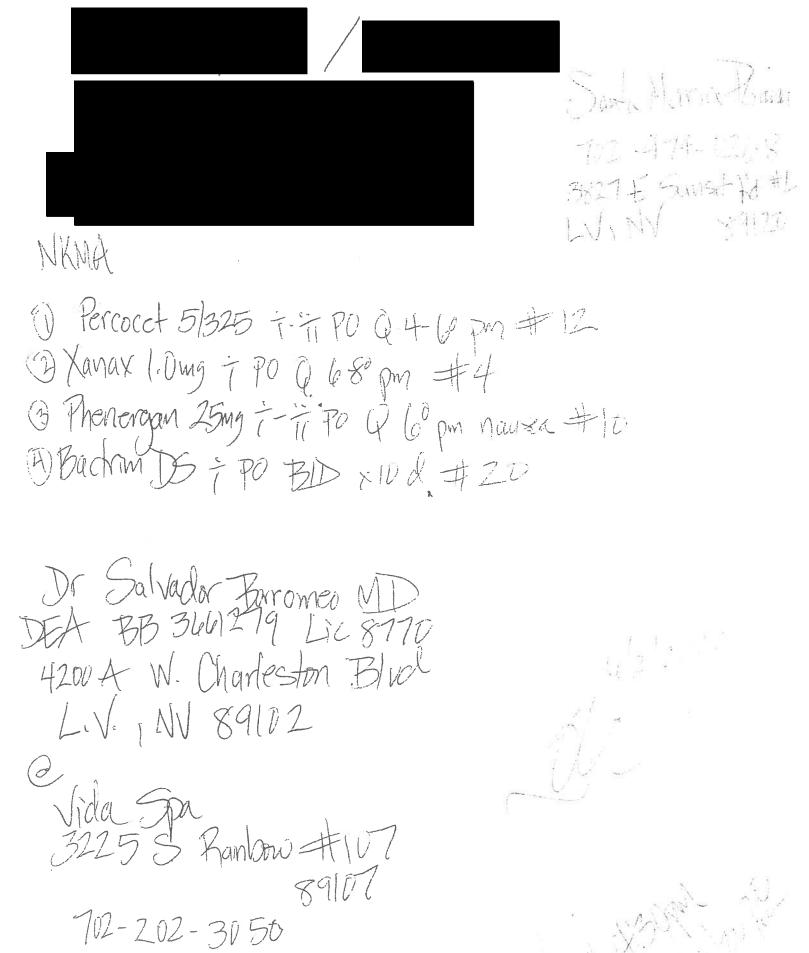
I Acknowledge the receipt of the following:

- Bill of Rights
- Consent of Pharmacy delivery service/assignment of benefits
- Notice of privacy practice



- Patient's Satisfaction survey

Log #: 262854



Appointment Cancellation Policy For Vida Spa

The fees quoted for cosmetic procedures and surgeries are inclusive of the following:

Pre-operative exam, surgeon fees, materials, anesthesia, operating facility, and post-operative visits.

If additional corrective surgery or elective aesthetic correction is desired, there will be additional surgeon, facility, and material fees incurred.

In office treatments such as Botox, Voluma, Juvederm, Dysport, Restylane, or other filler materials, chemical peels, Asclera therapy, and other similar therapies are priced on a pretreatment basis or package option and additional cost is possible based on consumption.

Office treatments and services are payable in full at the time of your appointment.

If you elect to have a procedure or surgery and would like to secure the date that works best for your schedule, a 50% deposit of the surgeon fees is required to secure your date. The full balance is due two weeks prior to surgery. If your surgical booking is within two weeks of surgery, then payment is due in full.

There is a non-refundable administrative cancellation fee of \$1000 if you decide to cancel your procedure or surgery once your date has been secured and payment is accepted in our office. Additionally, should your scheduled procedure/surgery be cancelled, the following applies:

Cancellation 8-14 days prior to scheduled procedure/surgery date will result in 25% loss of fees. Cancellation 7-2 days prior to scheduled procedure/surgery date will result in 50% loss of fees. Cancellation made the day before or day of scheduled procedure/surgery date will result in 100% loss of fees.

By signing this form, I acknowledge that I understand The Vida Spa's Patient Policies. I agree to be personally responsible for all payments due for my medical/surgical care.

Patient/Responsible Party's Signature

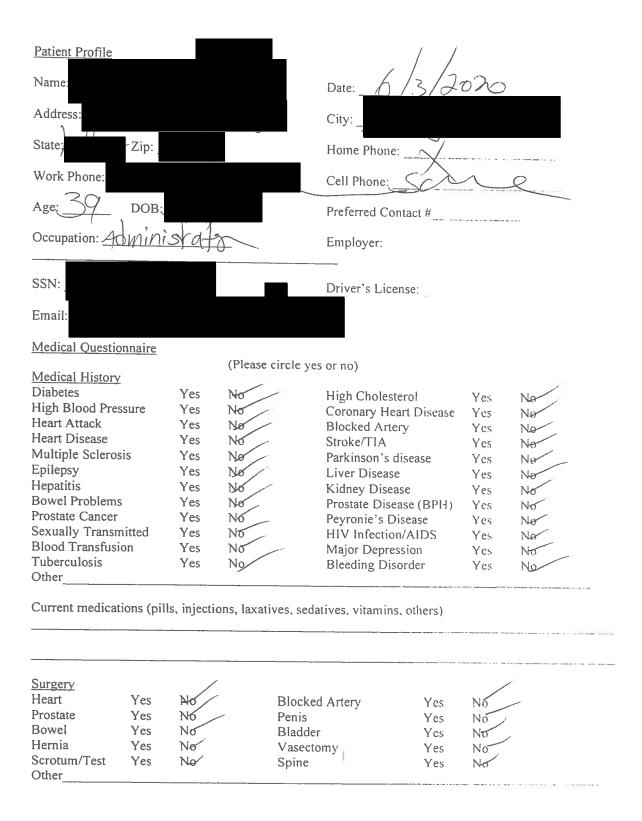
Print Name

Date

Vida Spa 3225 S Rainbow Blvd. #107 Las Vegas, NV 89146

. Cons	sent for Surgery and Procedures
I assigned, to perform the elective procedure(s)	, desire the doctor, PA, and such qualified nurses and assistants as may be of:
to treatment/surgery, risks and possible compl nurses and assistants as assigned. I have been bleeding, infection, nerve or tissue damage, at that no guarantees or assurances have been m I understand that anesthesia may be anesthesia as the doctor, PA, and such qualified as the doctor, PA, and such qualified nurses a lt has been explained to me that duri necessitate an extension of the original proce- assistants as may be assigned, to perform suc- service of pathologists, radiologists, laborator treating conditions that are not known to my	given, and that it, too, carries risks. I consent to the administration and use of ed nurses and assistants as may be assigned, and to the use of such anesthesia and assistants as may be assigned, may deem advisable. In the course of the operation unforeseen conditions may be revealed that dure, and I hereby authorize the doctor, PA, and such qualified nurses and the procedures as are necessary and/or desirable, including but not limited to the ry, or medical centers. The authority granted in this paragraph shall extend to providers at the time the operation commences.
I understand that photography is imp	portant in planning and evaluating surgery, and I give permission for e, during, and after my surgery and/or procedure. I give consent to use such
I agree to keep Vida Spa, the doctor any change in my permanent address so they procedure(s). I further agree to cooperate with	tion purposesin office patient teachingadvertising and PR, PA, and such qualified nurses and assistants as may be assigned, informed of can inform me of any important new findings relating to my surgery and/or the in my aftercare until I am discharged from said surgery and/or procedure(s)
that I have discussed them with the doctor are risks in the medical services to be provided, forever discharge the doctor, PA, nurses, ass representatives, whatsoever, from and hereby whatsoever arising out of or relating to, directly limitation, as a result of the actions, including directors, officers, employees, agents, and result of the actions of this agreement, including the prior to the execution of this agreement.	rtify that I understand the risks, benefits, and alternatives to my procedure(s) and ind/or PA. I, the patient have been advised and understand that there are inherent which I have voluntarily elected to undergo. I, the patient, forever release and istants, Vida Spa, shareholders, directors, officers, employees, agents, and y waive all actions, lawsuits, obligations, damages, losses, and claims, ectly or indirectly, the medical services to be provided including, without ang negligence, of the doctor, PA, nurses, assistants. Vida Spa, its shareholders, epresentatives, ature below, understanding of, and has had the opportunity to discuss the release from liability, with his/her counsel, whether or not they have done so.
procedure(s). Please advise a staff member to discuss them with you.	of these questions or concerns so arrangements can be made for the doctor or P/
Signature: Printed name:	
Witness	Date:





Previous Urolog		ms						
Kidneys Bladder	Yes	No		nis		Yes	New	
Prostate	Yes Yes	No	and it	sticles		Yes	NO	
1 TOState	1 62	No	Ur	ine		Yes	No	
Injuries								
Head	Yes	No	Ba	ck		Yes	Nimm	_
Pelvis	Yes	No	Pe			Yes	NO	
Other						103	180	
History of D								The state of the s
History of Recre Alcohol?	No No	-	-	_				
Smoking?	No	Yes Yes	How Often					
Recreational Dru			How Much	?				
.teereational Dit	ig. Mail	uana, Co	ocame, wieth, e	etc? No	Yes. Ho	ow Often	? 	
Family History								
Diabetes		Yes	No Pre	mature Hear	rt Attack	Yes	NO	
Cancer of the Pro	ostate	Yes		gh Blood Pre		Yes	No	
						1 0.5	140	
Social History:	/	1						
Marital Status:	Single	Marrie	d Diversed	0				
a ital Biatas.	Siligie	walle	d Divorced	Separated	Widow	ed		
Physical Activity		Inactiv	e Light	Moderate	Heavy			
,		********	o Digitt	WOOGCI ALC	псачу			
Allergies								
Have you ever ha	ad an alle	ergic read	ction to any me	edications?	Yes	Na		
If yes, please pro	vide deta	ails:						

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Please provide yo	NUT CUITTA	nt physic	ions.					
rouse provide ye	our curre	Name	LIAIIS.	Dhone		C		
		rantic		Phone		Specialt	λ,	Last Visit
Family Physician								
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Specialist								
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Specialist								
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			_ Chief Com	ıplaint:				Ht:
Vital Signs: Te	mp:		HR:	BF	o:	RI	₹:	Ht:
Wt:	_ Medi	cation A	Allergies:	-				
			_					

Medication Dose Frequency Social History On the Medication Dose Frequency
The state of the s
Marital Status: Single Married Divorced Widowed Tobacco Use: No Yes (If yes, # of packs/day # years) Caffeine Use: No Yes (If yes, check all that apply: Coffee Tea Soda; Alcoholic beverage consumption: No Yes (If yes, how much and often) Medical History: HTN Heart Disease Diabetes Stroke Anxiety Depression Asthma GERD Cancer Other:Surgical History: Appendectomy Cholecystectomy Thyroidectomy Hemorrhoidectomy Mammogram Hysterectomy Breast Surgery Tubal litigation Colonoscopy Hernia Repair (location/type)
Other:
Family History: Please describe any additional problem/concerns which you think the Physician should be made aware of:
Diabetes Heart Disease HTN Cancer Other Mother Father Sister Brother Grandfather Grandmother Aunt Uncle

		. 8	Patient In	formation			
Patie	nt Name	9					
Address							
71001033	<u>.</u>		Phone:				
			_ Emergency C	ontact:_			
Woight	101/1			(30)			
weight:	// kg	lbs Hei	ght: BMI	Age:(D	OBę	Gender:	
Allerg	i es Medication:_	1	Reaction:			Y	
1	Medication:_						
ľ	Medication:_		Reaction:			_	
Medicat	ion)	Dose F	requency	Medication	Dose	Frequency	
-/							
			N. 352				
Social H	letone		(A)				
	ion:	sinistra,	Marital Sta	atus: O Single	Married On	ivorced OWidowed	
Tobacco	Use:	No Yes (If	yes, # of packs/day			voiced O Midowed	
Caffeine	Use: O	No Yes (If	yes, check all that a	nnly: Coffee	Tea Soda	-1	
Alcoholic	beverage o	consumption:	No Yes (If yes,	bow much and or	flon	x)	
	History:		77.00 (ii yes,	HOW HINGH BIND O	iteri		
		Chalanustaet					
☐ Huet	toractomy [Branch Comment	omy Thyroidecto	my UHemorrho	oldectomy	ammogram	
			y Tubal litigation	∐Colonoscopy			
		ocation/type)	7 7 7	01			
☐ Othe	er:					91	
Fai	mily History	: Has anyone in your f	amily had any of the followir	ig conditions? (Check if	yes, and indicate rela	tionship to you)	
	Cancer/Polyps_		19				
1	Cancer/Polyps						
Pro	ostate, Uterus, (Ovaries, Thyroid, Lun	g, Blood Clots	l l	eding Problems		
i	ood, Lymphoma		☐ Heart Disease		atitis		
Ott	her		Stroke	☐ Othe		B	

BLEEDING PROBLEMS DO YOU BRUISE OR BLEED EASILY? YES DO (WIT	TH CUTS / T	ООТН ЕХТ	RAC'TIONS !	DDUGMANOV (SUBCURY)			
EXPLAIN			10101101137	TREGNANCI / SURGERY)			
DO YOU HAVE A FAMILY HISTORY OF BLEEDING PROBLEMS?	FXPI AIN						
DIFFICULTIES WITH LOCAL OR GENERAL ANESTHI	GCEA	1/4					
	ESIA						
EXPLAIN		<i></i>	/_				
HAVE YOU EVER HAD A BLOOD TRANSFUSION?	YES	NO					
ARE YOU PREGNANT?	YES	NO					
HAVE YOU EVER HAD, HAVE OR BEEN EXPOSED TO	(PLEASI	E CIRCLE	VESORN	(n)			
INTRAVENOUS DRUGS		YES	NO _				
YES NO INFECTIOUS DISEASES YES NO TB		YES	NO	HIV / AIDS			
IF YES TO ANY EXPLAIN		YES	NO	LIVER TRANSPLANT			
	.,						
	4	***					
8							
Review of Systems: Do you current	ly basia an						
Review of Systems: Do you current General: Nothing in this group	iy nave an	y or the to	liowing syn	ovascular: Nothing in this group			
☐ Weight loss – How muchlbs			1				
Loss of Appetite				Chest pain ☐ Palpitations			
Fever				☐ Heart valve problems			
☐ Chills			1				
☐ Night Sweats			- 1	Calf pain with walking			
☐ Fainting Spells			☐ re(☐ Leg swelling			
Eyes: Nothing in this group			1	Respiratory: Nothing in this group			
Eye disease or injury			1	Chronic cough			
☐ Wear glasses or contacts			- 1	Coughing up blood			
☐ Blurred or double vision				☐ Short of breath with activity			
Ear, Nose, Mouth, Throat: Nothing in the	_82			☐ Short of breath lying flat			
Hearing loss	ns group		□ Wh	□ Wheezing			
☐ Ear ache / infection			1 —	☐ Asthma			
i			☐ Bro	☐ Bronchitis			
☐ Ringing in ears			☐ Pne	☐ Pneumonia			
☐ Nose Bleeds			Musci	uloskeletal: [] Nothing in this group			
☐ Bleeding gums			· ·	☐ Joint pain			
Mouth sores			rthri	•			
☐ Sore throat							
Recent voice change			☐ Bad				
Runny nose / cold			2100	scle weakness			
☐ Sinus problems				pain with walking			
☐ Neck stiffness / pain				☐ Leg pain at rest			
☐ Enlarged neck glands / masses				☐ Broken bones			

Digestive: Nothing in this group	Neurological: Nothing in this group
☐ Loss of appetite	Frequent headaches
☐ Difficulty swallowing	☐ Migraines
☐ Early satiety (fill up easy)	☐ Weakness
☐ Heartburn	☐ Seizures
☐ Nausea	☐ Stroke
☐ Vomiting	☐ Paralysis
☐ Diarrhea	☐ Decreased sensation
☐ Constipation	☐ Difficulty with speech
☐ Blood in stool	Dizziness
☐ Dark, tarry stools	
Abdominal pain	Psychlatric: Nothing in this group
☐ Painful bowel movements	☐ Anxiety
☐ Poor control of BMs, urgency	☐ Depression
	☐ Mood swings
Urinary: Nothing in this group	Phobias, fears
Burning with urination	☐ Panic attacks
☐ Weak urine stream	Suicide thoughts or attempts
☐ Blood in urine	
☐ Gas or stool in urine	Endocrine Nothing in this group
☐ Poor control, leakage of urine	☐ Heat or cold intolerance
☐ Kidney stones	☐ Excessive thirst
☐ Prostate problems	☐ Excessive urination
☐ Testicular mass	☐ Excessive Sweating
Get up at night to urinate - Number of times per night	
Gynecologic (female) Nothing in this group	Hematologic, Lymphatic: Alothing in this group
☐ Irregular periods - Last period:	☐ Prior blood transfusion
☐ Abnormal vaginal discharge	☐ Easy bleeding or bruising
	☐ Low red blood cell count (anemia)
Breast: Nothing in this group	Low white blood cell count
☐ Breast lump	Prolonged bleeding with cuts, surgery
☐ Breast pain	☐ Swollen glands
☐ Nipple discharge	☐ Blood clots
	Use of blood thinners
Skin: Nothing in this group	Swollen lymph nodes
☐ Rash	
Skin infections	Allergic, Immunologic. Nothing in this group
☐ Ulcers or sores	HIV infection /
☐ Yellowing of the skin	☐ Hepatitis
☐ Eczema, psoriasis, other	☐ Imune deficiency
☐ Pyoderma gangrenosum, erythema nodosum	☐ Antibiotics needed for dental work



Pala Spu

3225 S. Rainbow Blyd, Ste 107 Las Fegas, NV 89146 www.vidaspalv.com

VASER LIPO INFORMED CONSENT

This is an informed-consent document that has been prepared to help educate you on the VASER Lipo procedure, its risks, and alternative treatment.

It is important that you read this information carefully and completely. Please initial each page, indicating that you have read the page, and sign the Consent for Surgery as proposed by your surgeon.

VASER Lipo is a surgical technique to remove unwanted deposits of fat from specific areas of the body, including the face and neck, upper arms, upper and lower back, abdomen, buttocks, hips, inner and outer thighs, knees, calves, and ankles. This is not a substitute for weight reduction, but a method for removing localized deposits of fatty tissue. VASER Lipo may be performed as a primary procedure for body contouring or may be combined with other surgical techniques.

The best candidates for VASER Lipo are individuals of relatively normal weight who have excess fat in particular body areas. Having firm, elastic skin will result in a better final contour after lipoplasty. Skin that has diminished tone due to stretch marks, weight loss, or natural aging will not reshape itself to the new contours and may require additional surgical techniques to remove and tighten excess skin. Body-contour irregularities due to structures other than fat cannot be improved by this technique. Lipoplasty itself will not improve areas of dimpled skin known as "cellulite".

The VASER Lipo procedure is performed utilizing advanced proprietary technology. A patented grooved solid metal probe is first inserted through one or more small skin incisions. Ultrasonic energy emitted from the sides and end of the probe as it is passed back and forth breaks down fatty deposits. A hollow metal surgical instrument known as a cannula is then inserted and is directed through the area of emulsified fat cells. The cannula is attached to a vacuum source, which provides gentle suction to remove the emulsified fat. Because the VASER Lipo procedure is unique in that it first targets and dissolves fat cells and then draws out emulsified fat, leaving the collagen matrix intact, surgical trauma, complications and the potential for post-operative pain and bruising are minimized while skin retraction is optimal.

VASER Lipo may be performed under local or general anesthesia and requires the infiltration of fluid containing dilute local anesthetic and epinephrine into areas of fatty deposits. This technique can reduce discomfort at the time of surgery, as well as reduce post-operative bruising.

Support garments and dressings are worn after surgery to control potential swelling and promote healing, to provide comfort and support, and to help skin better fit new body contours. Your surgeon may recommend that you make arrangements to denate a unit of your own blood that would be used if a blood transfusion were necessary after surgery.

ALTERNATIVE TREATMENT

Alternative forms of management include not treating the areas of fatty deposits, and diet and exercise regimens that may be of benefit in the overall reduction of excess body fat. Direct removal of excess skin and fatty tissue may be necessary in addition to lipoplasty in some patients. Risks and potential complications are associated with alternative forms of treatment that involve surgery.



RISKS AND SIDE EFFECTS

Every surgical procedure involves a certain amount of risk, and it is important that you understand the risks involved with the VASER Lipo procedure. An individual's choice to undergo a surgical procedure is based on the comparison of the risk to potential benefit. Although the majority of patients do not experience these complications, you should discuss each of them with your surgeon to make sure you understand the risks, potential complications, and consequences of VASER Lipo.

Patient Selection: Individuals with poor skin tone, medical problems, or unrealistic expectations may not be candidates for VASER Lipo.

Allergic Reactions: Rarely, local allergies to tape, suture material, or topical preparations utilized in hipoplasty procedures have been reported. More serious systemic reactions due to drugs administered during surgery and prescription medicines may require additional treatment.

Asymmetry: Due to factors such as skin tone, bony prominence, and muscle tone, which can contribute to normal asymmetry in body features, it may not be possible to achieve symmetrical body appearance through lipoplasty procedures.

Bleeding: While unusual, it is possible to have a bleeding episode during or after surgery. Should post-operative bleeding occur, it may require emergency treatment to drain accumulated blood or require a blood transfusion. Non-prescription herbs and dietary supplements can increase the risk of surgical bleeding. Do not take any aspirin or anti-inflammatory medications for 2 weeks before surgery, as this may increase the risk of bleeding. Please review our Medication Alert for products and ingredients to be avoided for 2 weeks prior to and 2 weeks following your scheduled VASER Lipo procedure, and consult your doctor before taking anything.

Change in Skin and Skin Sensation: A temporary decrease in skin sensation may occur following VASER Lipo. This usually resolves over a period of time. Diminished or complete loss of skin sensation that does not totally resolve could potentially occur, as it infrequently has with various lipoplasty procedures.

Chronic Pain: Chronic pain and discomfort following VASER Lipo is unusual, but possible.

Infection: Infection is uncommon following this type of surgery. Should an infection occur, treatment with antibiotics or additional surgery may be necessary. Although extremely rare, life-threatening infections such as toxic shock syndrome could occur after lipoplasty surgery, regardless of the technology utilized.

Pulmonary and Systemic Complications: In extremely rare cases, fat droplets could become trapped in the lungs to create a possibly fatal complication called fat embolism syndrome. Pulmonary complications may occur secondarily to blood clots (pulmonary emboli) or partial collapse of the lungs after general anesthesia. Should either of these complications occur, you may require hospitalization and additional treatment. In some circumstances, pulmonary emboli can be life-threatening or fatal.

Long-term Effects: Subsequent alterations in body contour may occur as a result of aging, weight loss or gain, pregnancy, or other circumstances not related to VASER Lipo.



Scarring: Although the incisions created for VASER Lipo are minimal and good wound healing after a surgical procedure is expected, abnormal scars may occur within the skin and deeper tissues in rare cases. Such scars may be unattractive and of a different color than the surrounding skin. Additional treatments, including surgery, may be necessary to treat abnormal scarring.

Seroma: While VASER Lipo has reduced the incidence and severity of seromas associated with lipoplasty procedures, such fluid accumulation is possible and could require additional treatments or surgery to promote drainage.

Bruising and/or Swelling: Although VASER Lipo typically reduces or eliminates bruising and swelling normally resulting from lipoplasty procedures, bruising and swelling may occur and, in rare situations, persist for extended periods of time.

Skin Contour Irregularities: Since VASER Lipo selectively targets fat cells, leaving other essential tissues intact, skin contour irregularities and depressions in the skin are unlikely but possible. Visible and palpable wrinkling of skin can occur, particularly when large quantities of fat cells are removed and/or the skin is lacking good elasticity. Post-operative skin contour irregularities could necessitate additional treatments including surgery.

Skin Loss: Additional treatments including surgery could be necessary in the unlikely event that skin loss occurs following your VASER Lipo treatment.

Surgical Anesthesia: All forms of surgical anesthesia or sedation, whether administered locally or generally, carry risks including the possibility of complications, injury, and even death. You will probably be required to sign a separate anesthesia consent form in preparation for your surgery.

Surgical Shock: VASER Lipo could conceivably cause severe trauma, particularly when multiple or extensive areas are treated in a single session. Although serious complications are a rarity, infections or excessive fluid loss can lead to severe illness and even death. Should surgical shock occur following your VASER Lipo treatment, hospitalization and additional treatment would be necessary. Individuals undergoing VASER Lipo procedures to remove large volumes of fat are at a greater risk of complications. Patients contemplating large-volume lipoplasty (greater than 5000 cc removed) may be advised to undergo post-operative monitoring and aftercare that involves overnight hospitalization.

Lidocaine Toxicity: There is the possibility that large volumes of fluid containing dilute local anesthetic drugs and epinephrine that is injected into fatty deposits during surgery may contribute to fluid overload or systemic reaction to these medications. Additional treatment including hospitalization may be necessary.

Ultrasonic Technology: Risks associated with the use of ultrasound in lipoplasty treatments include the aforementioned and the following specific risks:

Burns: Ultrasonic energy may produce burns and tissue damage if the probe touches the undersurface of the skin for prolonged periods of time. If burns occur, additional treatment and surgery may be necessary.

Patient Initials:



Probe Fragmentation: Ultrasonic energy produced within the probe(s) may cause disintegration (fragmentation) of the surgical instrument. The occurrence and effect of this is unpredictable. If this should occur, additional treatment including surgery may be necessary.

Unknown Risks: The long term effect on tissue and organs of exposure to short-duration, high-intensity ultrasonic energy is unknown. The possibility exists that additional risk factors resulting from the use of ultrasound in VASER Lipo could potentially be discovered.

Other: While we have attempted to assist you in building realistic expectations for your VASER Lipo treatment, you may be disappointed with your surgical results. However infrequent, it may be necessary in your case to perform additional surgery to improve results.

ADDITIONAL SURGERY NECESSARY

There are many variable conditions in addition to risk and potential surgical complications that may influence the long term result of VASER Lipo. Even though risks and complications are unusual, the risks cited previously are particularly associated with lipoplasty procedures utilizing suction and/or ultrasound technologies. Other complications and risks can occur but are even more uncommon. If complications should occur, additional surgery or other treatments may be necessary. The practice of medicine is not an exact science. Although good results are expected, there is no guarantee or warranty expressed or implied on the results that may be obtained.

FINANCIAL RESPONSIBILITIES

The cost of surgery involves several charges for the services provided. The total includes fees charged by *your* doctor, the cost of surgical supplies, anesthesia, laboratory tests, and possible outpatient hospital Charges, depending upon where the surgery is performed. Due to the proprietary nature and expense of the technology utilized, your bill may reflect a separate and additional fee for the use of VASER equipment specific to your procedure. Based upon whether the cost of surgery is covered by an insurance plan, you will *be* responsible for necessary copayments, deductibles, and charges not covered. As an elective, cosmetic procedure, VASER Lipo is not typically covered by insurance, placing full responsibility for payment upon the patient. You may incur additional costs should complications develop from the surgery. Secondary surgery or hospital day-surgery charges incurred due to remedial surgery are also the responsibility of the patient.



DISCLAIMER

Informed-consent documents are used to communicate information about the proposed surgical treatment of a disease or condition along with disclosure of risks and alternative forms of treatment(s). The informed consent process attempts to define principles of risk disclosure that should generally meet the needs of most patients in most circumstances.

However, informed consent documents should not be considered all inclusive in defining other methods of care and risks encountered. Your surgeon may provide you with additional or different information that is based on all the facts in your particular case and the state of medical knowledge.

Informed-consent documents are not intended to define or serve as the standard of medical care. Standards of medical care are determined on the basis of all of the facts involved in an individual case and are subject to change as scientific knowledge and technology advance and as practice patterns evolve. It is important that you read the above information carefully and have all of your questions answered before signing the the next page.



I have received and read the information: VASER® Lipo Informed Consent

I understand that VASER Lipo is an elective surgery procedure to remove body fat from specific area(s) of the body.

The procedure has been explained to me in a way that I understand. I have had the opportunity to ask questions, and my questions have been answered. Alternative methods of treatment have been discussed with me.

I acknowledge that no guarantee has been given by anyone as to the results that I may obtain. Although a good result is expected, I understand that there are risks to the procedure or treatment proposed, as detailed in the preceding information pages.

I consent to the administration of such anesthetics considered necessary or advisable. I understand that a/l forms of anesthesia involve risk and the possibility of complications, injury, and sometimes death.

For purposes of advancing medical education, I consent to the admittance of observers to the operating room.

I consent to the disposal of any tissue, medical devices or body parts which may be removed.

I authorize the release of my Social Security number to appropriate agencies for legal reporting and medical device registration, if applicable.

Having discussed the reasonable expectations of the VASER Lipo procedure with me and answered all of my questions to my satisfaction, I hereby authorize and such assistants as may be selected to perform VASER Lipo and any other procedure(s) that in their judgment may be necessary or advisable should unforeseen circumstances arise during surgery.

With my signature below I hereby consent to having VASER Lipo and to the above.

Please rewrite in your own handwriting: "I understand that the practice of medicine is not an exact science and although good results are expected, there can be no guarantee as to the results."

Patient Signature _

Date

6



NSBME 0225

I certify that I, and/or a member of Vida Spa staff, have discussed all of the above with the patient and answered all questions regarding the VASER Lipo procedure. I believe the patient fully understands and all questions have been answered.

Clinician Signature	Date
I am a smoker of tobacco:	
	ses health risks. Doctor and staff have advised me to stop smoking and, if that is bunt of my smoking, and to discontinue all smoking for two weeks before and two
•	lecreased circulation secondary to smoking of tobacco and/or marijuana and that s well as skin breakdown, skin loss and scarring.
<u> </u>	y will have to be more conservative and less aggressive than usual to try to avoid ir, despite the doctor's best efforts to avoid them.
This has been fully explained to me and 1	I relieve Vida Spa from any responsibility related to the increased risks from my
smoking habits.	
Patient Signature	
I am a non-smoker of tobacko:	
Patient Signature-	
I do not use social drugs.	
Patient Signature	
Patient name (please print):	
DOB:	
Requested By:	_
Patient Initials:	7



I, the above-named patient, hereby consent that photographs, videotape, and/or computer imaging may be taken of me or of parts of my body under the following conditions:

Pre- and post-operative photographs will be taken of my treatment for record purposes. The photographs will be taken by my physician or a photographer approved by my physician. I understand that these photographs will be the property of the attending physician and Vida Spa.

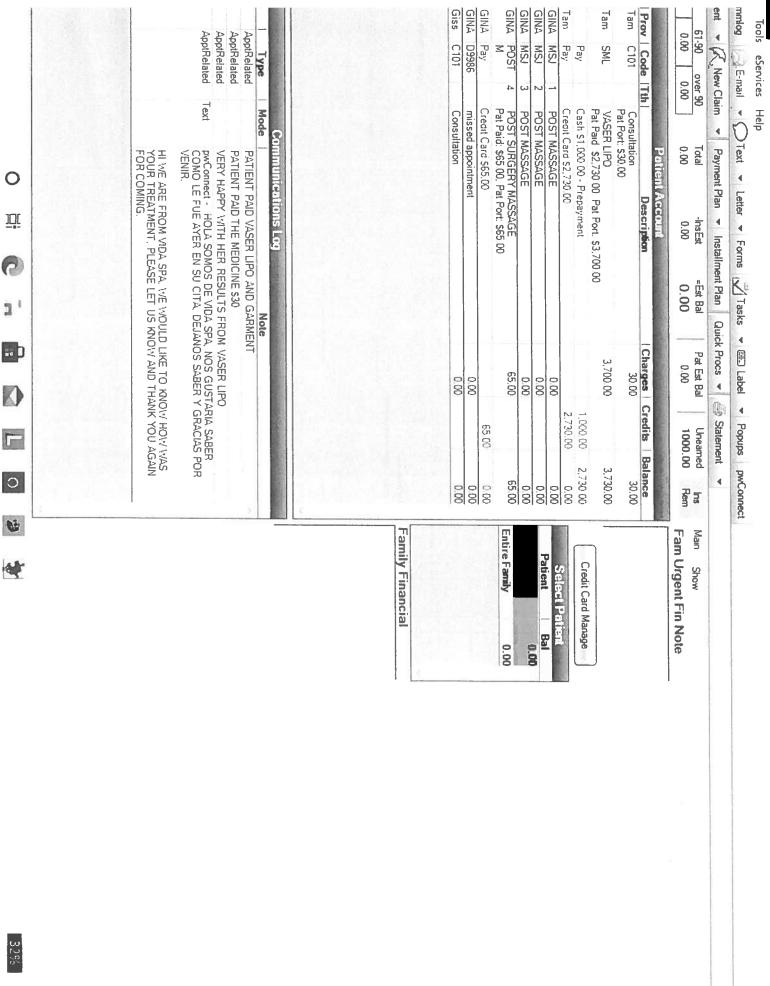
I understand that all computer imaging viewed is only a representation of the result that could be achieved through this procedure and that imaging is used as an educational tool to benefit the patient without guarantee of any result.

I have had the opportunity to discuss this consent with my surgeon and agree that all of my questions have been answered. This authorization is granted in furtherance of medical education and other good and valuable consideration and as a voluntary contribution. I hereby waive all rights I might have to photographs, videotape, and computer images and do hereby release, discharge, and save harmless Vida Spa and their employees and agents from all claims and liabilities whatsoever in law and in equity arising from such use.

I have read and fu	ully understand and consent to all	the above items contain	ed in this form.
Patient Signature		Date _	6/3/200
			/ /

EXHIBIT 11

EXHIBIT 11





PATIENT NAME: DATE: 06 - 4 - 2020	-
	12: 25 12: 24
PHONE NUMBER:	12:15 12:31
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PERCOCET DIDOA 2014 M/Z). HIGH: 100 131/94	
KEFLEX PIZO METHA ZINE (Z) HIGH. LOW: Set Sulciable Colors LOW: Set Sulc	
PHERGAN SULFH METHOXAZOLE (1)	
Cephalexine 500 mg 1 Tab 10 Dustoins.	
TIME OF MEDICATIONS GIVING: 4 11 (4.m) 1005	
	7
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VASER TIME:	
ASPIRATE TIME: 11:10	
END: 15:50 pm.	
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Santa Maria Pharmacy

3827 E. Sunset Road, Unit L Las Vegas, NV 89120 Phone: (702) 474-0268

Phone: (702) 474-0268 Fax: (702) 474-0274 Delivered To:

3225 S RAINBOW BLVD LAS VEGAS NV 89120 (702) 622-3054

MOJAVE HEART AND VASCULAR

Rx Delivery Receipt

	6/3/2020 5:17:03 PWI			
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				0.40.00
4767	06/03/2020 PROMETHAZINE 25 MG TABLET	10	1	\$10.00
4766	06/03/2020 ALPRAZOLAM 1 MG TABLET	4	1	\$10.00
1765	06/03/2020 OXYCODONE-ACETAMINOPHEN 5-325	12	1	\$10.00
4768	06/03/2020 SULFAMETHOXAZOLE-TMP DS TABLET	20	1	\$5.00
				\$35.00
atient/Caregiver/Relation Name	() Self () Caregiver () Parent () Sibiling () Child () Other	rs		
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Comments/Notes :				
The enclosed prescription(s) are being delivour Pharmacist about your medication(s). For some of the consultation.	ered to you on behalf of Santa Maria Pharmacy. You are er Please contact us at (702) 474-0268 during normal business	ititied to s hours f	or a	with
Any Questions or concerns? Please contact	t us at (702) 474-0268.			
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I Authorize the release of medical or other inforantion necessary to process the claim.

I Also Request the payment of benefit to: Santa Maria Pharmacy

I Acknowledge the receipt of the following:

- Bill of Rights
- Consent of Pharmacy delivery service/assignment of benefits
- Notice of privacy practice
- Patient's Satisfaction survey



Log #: 263031

MOJAVE HEART AND VASCULAR GROUP **SALVADOR G. BORROMEO, M.D.** DEA # BB3661279 LIC. # 8770 NPI # 1669461919 4200-A W. CHARLESTON BLVD. LAS VEGAS, NV 89102 (702) 824-2307 TEL. (800) 579-9591 FAX

NAME	DOB.
ADDRESS	DATE WATE
R TAMPER-RESISTANT SECURITY FEA	TURES LISTED ON BACK OF SCRIPT
Percocet 5/	325 Tin POQ 46 pm # 12
Xanay L. Dm	10 TPOQ6-80pm #4
Phenergan ?	25mg 7-170 Q \$6pm +10
Bactrim DS	25mg t f PO Q \$6pm + 10
	1

To ensure brand name dispensing, prescriber must handwrite "Dispense As Written" on the prescription.

000573

9J26IM**2124750**

NKMA

Percocet 5/325 j-jr PO Q 4-10 pm #12 Yanax 1.Dmg TPOQ 6-80pm #4 Phenergan 25mg j-ji PO Q 60 pm #10 Bactrim DG T PO BIDX IDD #20

Dr Barromco JEA 333661279 Lic#8770

Appointment Cancellation Policy For Vida Spa

The fees quoted for cosmetic procedures and surgeries are inclusive of the following:

Pre-operative exam, surgeon fees, materials, anesthesia, operating facility, and post-operative visits.

If additional corrective surgery or elective aesthetic correction is desired, there will be additional surgeon, facility, and material fees incurred.

In office treatments such as Botox, Voluma, Juvederm, Dysport, Restylane, or other filler materials, chemical peels, Asclera therapy, and other similar therapies are priced on a pretreatment basis or package option and additional cost is possible based on consumption.

Office treatments and services are payable in full at the time of your appointment.

If you elect to have a procedure or surgery and would like to secure the date that works best for your schedule, a 50% deposit of the surgeon fees is required to secure your date. The full balance is due two weeks prior to surgery. If your surgical booking is within two weeks of surgery, then payment is due in full.

There is a non-refundable administrative cancellation fee of \$1000 if you decide to cancel your procedure or surgery once your date has been secured and payment is accepted in our office. Additionally, should your scheduled procedure/surgery be cancelled, the following applies:

Cancellation 8-14 days prior to scheduled procedure/surgery date will result in 25% loss of fees. Cancellation 7-2 days prior to scheduled procedure/surgery date will result in 50% loss of fees. Cancellation made the day before or day of scheduled procedure/surgery date will result in 100% loss of fees.

By signing this form, I acknowledge that I understand The Vida Spa's Patient Policies. I agree to be personally responsible for all payments due for my medical/surgical care.

	$\frac{5 27 2020}{\text{Date}}$
Patient Responsible Party & Signature	Date
<u> </u>	
Print Name	

Vida Spa 3225 S Rainbow Blvd, #107 Las Vegas, NV 89146

Consent for Surgery and Procedures

, desire the ssigned, to perform the elective procedure(s) of:	ne doctor, PA, and such qualified nurses and assistants as may be
	d. L. Communication including
o treatment/surgery, risks and possible complications hav	rocedure(s), possible alternative methods of treatment, including we been fully explained to me by Vida Spa, doctor. PA, and such all surgery involves general risks, including but not limited to urdiac arrest, death, or other serious bodily injury. I acknowledge
hat no guarantees or assurances have been made as to the	e results that may be obtained.
I understand that anesthesia may be given, and the specified nurses and such qualified nurses an	hat it, too, carries risks. I consent to the administration and use of a same as a sam
It has been explained to me that during the cours necessitate an extension of the original procedure, and I have a spirous to professional procedure.	s as may be assigned, may deem advisable. se of the operation unforeseen conditions may be revealed that hereby authorize the doctor, PA, and such qualified nurses and es as are necessary and/or desirable, including but not limited to the
service of nathologists, radiologists, laboratory, or medic	cal centers. The authority granted in this paragraph share extend to
wasting conditions that are not known to my providers at	t the time the operation confinences.
I I I that photography is important in n	lanning and evaluating surgery, and I give permission in
photographs and or videos to be taken before, during, and	d after my surgery and/or procedure. I give consent to use such
media for:	es in office patient teaching advertising and PR
It'll Con the deater DA and Su	ich qualified niffses and assistants as may be assisted. Internal
· · · · · · · · · · · · · · · · · · ·	me of any important new infulings relating to my sensory
procedure(s). I further agree to cooperate with in my atte	ercare until I am discharged from said surgery unare pro-
that I have discussed them with the doctor and/or PA. I, risks in the medical services to be provided, which I have forever discharge the doctor, PA, nurses, assistants, Viderepresentatives, whatsoever, from and hereby waive all whatsoever arising out of or relating to, directly or individual limitation, as a result of the actions, including negligen directors, officers, employees, agents, and representative to the law.	
provisions of this agreement, including the release from	m natinty, with misriel counsel, wheater save
prior to the execution of this agreement. Please do not give your permission or sign this procedure(s). Please advise a staff member of these qu	is consent form if you have any questions regarding your sestions or concerns so arrangements can be made for the doctor or P
to discuss them with you.	
10 4150455	Date: 5-77-2071)
Signature:	Date:
Printed name:	Date: 5-27-2020 Relationship to patient: S-14
Witness:	Date:

Patient Information

Patie	ent Name	4					galan-sh ^a lan	
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Alcoho	olic beverage	consumption:	No	Yes (if ye	es, how much a	and often_		
·	cal History.	111111111111111111111111111111111111111	-1					
	ppendectomy	☐ Cholecyst	ectomy	□ Thyroide	ctomy Her	norrhoide	ctomy	Mammogram
□н	lysterectomy	☑ Breast Surg	gery []Tubal litigat	ion Colono	scopy		
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		'						
	Family Histor	ry: Has anyone in y	our family	had any of the fo	lowing conditions? (Check if yes,	and indicate	relationship to you)
	☐ Cancer/Polyps	4 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	A 5, 0	☐ Anemia				
		Anal, Stomach, Brea				1 —		
	Prostate, Uteru Blood, Lymphor	s, Ovaries, Thyroid,	Lung,	1	e	_		
	Other			Stroke		1		

BLEEDING PROBLEMS DO YOU BRUISE OR BLEED EASILY? YES NO (WITH CUTS / TOOTH EXTRACT	TIONS / PREGNANCY / SURGERY)		
EXPLAIN	A2 *		
DO YOU HAVE A FAMILY HISTORY OF BLEEDING PROBLEMS? EXPLAIN	The second secon		
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AREXOLETICS NO YES (NO			
MANUAL MODERNIA	S OR NO)		
	D HEPATITIS		
	HIV / AIDS		
YES NO TB YES ? IF YES TO ANY EXPEAIN	LIVER TRANSPLANT		
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Review of Systems: Do you currently have any of the follow	ing symptoms or conditions (Check if yes)		
General: Nothing in this group	Cardiovascular: Nothing in this group		
☐ Weight loss – How muchlbs	☐ Chest pain		
☐ Loss of Appetite	Palpitations		
☐ Fever	☐ Heart valve problems		
☐ Chills	☐ Calf pain with walking		
☐ Night Sweats	Leg swelling		
☐ Fainting Spells			
Eyes: Nothing in this group	Respiratory: Nothing in this group		
Eye disease or injury	☐ Chronic cough		
Wear glasses or contacts	☐ Coughing up blood		
☐ Blurred or double vision	☐ Short of breath with activity		
,	Short of breath lying flat		
Ear, Nose, Mouth, Throat: Nothing in this group	☐ Wheezing		
☐ Hearing loss	☐ Asthma		
☐ Ear ache / infection	☐ Bronchitis		
☐ Ringing in ears	☐ Pneumonia		
☐ Nose Bleeds	A STATE OF THE STA		
☐ Bleeding gums	Musculoskeletal: Nothing in this group		
☐ Mouth sores	☐ Joint pain		
☐ Sore throat	rthritis		
☐ Recent voice change	☐ Back pain		
Runny nose / cold	☐ Muscle weakness		
☐ Sinus problems	Leg pain with walking		
☐ Neck stiffness / pain	Leg pain at rest		
☐ Enlarged neck glands / masses	☐ Broken bones		

Digestive: Nothing in this group	Neurological: Nothing in this group
☐ Loss of appetite	☐ Frequent headaches
☐ Difficulty swallowing	☐ Migraines
☐ Early satiety (fill up easy)	☐ Weakness
☐ Heartburn	☐ Seizures
☐ Nausea	☐ Stroke
☐ Vorniting	☐ Paralysis
☐ Diarrhea	☐ Decreased sensation
☐ Constipation	☐ Difficulty with speech
☐ Blood in stool	☐ Dizziness
☐ Dark, tarry stools	
☐ Abdominal pain	Psychlatric: Nothing in this group
☐ Painful bowel movements	Anxiety
Poor control of BMs, urgency	Depression
	☐ Mood swings
Urinary: ☑ Nothing in this group	Phobias, fears
☐ Burning with urination	☐ Panic attacks
☐ Weak urine stream	Suicide thoughts or attempts
☐ Blood in urine	
☐ Gas or stool in urine	Endocrine: Nothing in this group
☐ Poor control, leakage of urine	☐ Heat or cold intolerance
☐ Kidney stones	☐ Excessive thirst
☐ Prostate problems	☐ Excessive urination
☐ Testicular mass	☐ Excessive Sweating
Get up at night to urinate - Number of times per night	
Gynecologic (female): Nothing in this group	Hematologic, Lymphatic: Nothing in this group
☐ Irregular periods - Last period: 5/20/2020	☐ Prior blood transfusion
☐ Abnormal vaginal discharge	Easy bleeding or bruising
	Low red blood cell count (anemia)
Breast: Nothing in this group	Low white blood cell count
☐ Breast lump	☐ Prolonged bleeding with cuts, surgery
☐ Breast pain	Swollen glands
☐ Nipple discharge	☐ Blood clots
	☐ Use of blood thinners
Skin: Nothing in this group	Swollen lymph nodes
Rash	
☐ Skin infections	Allergic, Immunologic: Nothing in this group
☐ Ulcers or sores	☐ HIV infection
Yellowing of the skin	Hepatitis
☐ Eczema, psoriasis, other	☐ Imune deficiency
Pyoderma gangrenosum, erythema nodosum	Antibiotics needed for dental work

Patient Profile						_	
Name				Date: _			
Address				City:			
State: Z	ip			Home Pho	one: NA		
Work Phone:		-:-		Cell Phon	e(:		
Age: 34 D	ов:			Preferred	Contact# (P	11	
Occupation:	NK	7		Employer	NIM :		
SSN				Driver's I	License:		
Email:							
Medical Questionn	a ire		(Please o	ircle yes or no)			
Medical History Diabetes High Blood Pressur Heart Attack Heart Disease Multiple Sclerosis Epilepsy Hepatitis Bowel Problems Prostate Cancer Sexually Transmit Blood Transfusion Tuberculosis Other Current medicatic	itted	Yes	NO N	High Cho Coronary Blocked Stroke/T Parkinso Liver Dis Kidney I Prostate Peyronie HIV Info Major D	Heart Disease Artery IA n's disease sease Disease Disease (BPH) c's Disease ection/AIDS epression g Disorder	Yes	No No No No No No No No No No No No No N
Surgery Heart Prostate Bowel Hernia Scrotum/Test Other OVAY	Proble Yes	Nø	.wa1(Blocked Artery Penis Bladder Vasectomy Spine	Yes Yes Yes Yes	No No No No No	
Bladder Prostate	Yes Yes	No No		Testicles Urine	Yes Yes	No No	
<u>Injuries</u> Head	Yes	(No)		Back	Yes	No	

Pelvis Other	Yes	(N6)	Penis		Yes No		
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Anxiety Depression Asthma GERD Cancer Other: $$ N $$ $$	
	Surgical
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Other:	
Family History: Please describe any additional problem/concerns which you the	nink the
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VASER LIPO INFORMED CONSENT

This is an informed-consent document that has been prepared to help educate you on the VASER Lipo procedure, its risks, and alternative treatment.

It is important that you read this information carefully and completely. Please initial each page, indicating that you have read the page, and sign the Consent for Surgery as proposed by your surgeon.

VASER Lipo is a surgical technique to remove unwanted deposits of fat from specific areas of the body, including the face and neck, upper arms, upper and lower back, abdomen, buttocks, hips, inner and outer thighs, knees, calves. and ankles. This is not a substitute for weight reduction, but a method for removing localized deposits of fatty tissue. VASER Lipo may be performed as a primary procedure for body contouring or may be combined with other surgical techniques.

The best candidates for VASER Lipo are individuals of relatively normal weight who have excess fat in particular body areas. Having firm, elastic skin will result in a better final contour after lipoplasty. Skin that has diminished tone due to stretch marks, weight loss, or natural aging will not reshape itself to the new contours and may require additional surgical techniques to remove and tighten excess skin. Body-contour irregularities due to structures other than fat cannot be improved by this technique. Lipoplasty itself will not improve areas of dimpled skin known as "cellulite".

The VASER Lipo procedure is performed utilizing advanced proprietary technology. A patented grooved solid metal probe is first inserted through one or more small skin incisions. Ultrasonic energy emitted from the sides and end of the probe as it is passed back and forth breaks down fatty deposits. A hollow metal surgical instrument known as a cannula is then inserted and is directed through the area of emulsified fat cells. The cannula is attached to a vacuum source, which provides gentle suction to remove the emulsified fat. Because the VASER Lipo procedure is unique in that it first targets and dissolves fat cells and then draws out emulsified fat, leaving the collagen matrix intact, surgical trauma, complications and the potential for post-operative pain and bruising are minimized while skin retraction is optimal.

VASER Lipo may be performed under local or general anesthesia and requires the infiltration of fluid containing dilute local anesthetic and epinephrine into areas of fatty deposits. This technique can reduce discomfort at the time of surgery, as well as reduce post-operative bruising.

Support garments and dressings are worn after surgery to control potential swelling and promote healing, to provide comfort and support, and to help skin better fit new body contours. Your surgeon may recommend that you make arrangements to donate a unit of your own blood that would be used if a blood transfusion were necessary after surgery.

ALTERNATIVE TREATMENT

Alternative forms of management include not treating the areas of fatty deposits, and diet and exercise regimens that may be of benefit in the overall reduction of excess body fat. Direct removal of excess skin and fatty tissue may be necessary in addition to lipoplasty in some patients. Risks and potential complications are associated with alternative forms of treatment that involve surgery.

Patient Initials:

1



RISKS AND SIDE EFFECTS

Every surgical procedure involves a certain amount of risk, and it is important that you understand the risks involved with the VASER Lipo procedure. An individual's choice to undergo a surgical procedure is based on the comparison of the risk to potential benefit. Although the majority of patients do not experience these complications, you should discuss each of them with your surgeon to make sure you understand the risks, potential complications, and consequences of VASER Lipo.

Patient Selection: Individuals with poor skin tone, medical problems, or unrealistic expectations may not be candidates for VASER Lipo.

Allergic Reactions: Rarely, local allergies to tape, suture material, or topical preparations utilized in hipoplasty procedures have been reported. More serious systemic reactions due to drugs administered during surgery and prescription medicines may require additional treatment.

Asymmetry: Due to factors such as skin tone, bony prominence, and muscle tone, which can contribute to normal asymmetry in body features, it may not be possible to achieve symmetrical body appearance through lipoplasty procedures.

Bleeding: While unusual, it is possible to have a bleeding episode during or after surgery. Should post-operative bleeding occur, it may require emergency treatment to drain accumulated blood or require a blood transfusion. Non-prescription herbs and dietary supplements can increase the risk of surgical bleeding. Do not take any aspirin or anti-inflammatory medications for 2 weeks before surgery, as this may increase the risk of bleeding. Please review our Medication Alert for products and ingredients to be avoided for 2 weeks prior to and 2 weeks following your scheduled VASER Lipo procedure, and consult your doctor before taking anything.

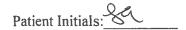
Change in Skin and Skin Sensation: A temporary decrease in skin sensation may occur following VASER Lipo. This usually resolves over a period of time. Diminished or complete loss of skin sensation that does not totally resolve could potentially occur, as it infrequently has with various lipoplasty procedures.

Chronic Pain: Chronic pain and discomfort following VASER Lipo is unusual, but possible.

Infection: Infection is uncommon following this type of surgery. Should an infection occur, treatment with antibiotics or additional surgery may be necessary. Although extremely rare, life-threatening infections such as toxic shock syndrome could occur after lipoplasty surgery, regardless of the technology utilized.

Pulmonary and Systemic Complications: In extremely rare cases, fat droplets could become trapped in the lungs to create a possibly fatal complication called fat embolism syndrome. Pulmonary complications may occur secondarily to blood clots (pulmonary emboli) or partial collapse of the lungs after general anesthesia. Should either of these complications occur, you may require hospitalization and additional treatment. In some circumstances, pulmonary emboli can be life-threatening or fatal.

Long-term Effects: Subsequent alterations in body contour may occur as a result of aging, weight loss or gain, pregnancy, or other circumstances not related to VASER Lipo.





Scarring: Although the incisions created for VASER Lipo are minimal and good wound healing after a surgical procedure is expected, abnormal scars may occur within the skin and deeper tissues in rare cases. Such scars may be unattractive and of a different color than the surrounding skin. Additional treatments, including surgery, may be necessary to treat abnormal scarring.

Seroma: While VASER Lipo has reduced the incidence and severity of seromas associated with lipoplasty procedures, such fluid accumulation is possible and could require additional treatments or surgery to promote drainage.

Bruising and/or Swelling: Although VASER Lipo typically reduces or eliminates bruising and swelling normally resulting from lipoplasty procedures, bruising and swelling may occur and, in rare situations, persist for extended periods of time.

Skin Contour Irregularities: Since VASER Lipo selectively targets fat cells, leaving other essential tissues intact, skin contour irregularities and depressions in the skin are unlikely but possible. Visible and palpable wrinkling of skin can occur, particularly when large quantities of fat cells are removed and/or the skin is lacking good elasticity. Post-operative skin contour irregularities could necessitate additional treatments including surgery.

Skin Loss: Additional treatments including surgery could be necessary in the unlikely event that skin loss occurs following your VASER Lipo treatment.

Surgical Anesthesia: All forms of surgical anesthesia or sedation, whether administered locally or generally, carry risks including the possibility of complications, injury, and even death. You will probably be required to sign a separate anesthesia consent form in preparation for your surgery.

Surgical Shock: VASER Lipo could conceivably cause severe trauma, particularly when multiple or extensive areas are treated in a single session. Although serious complications are a rarity, infections or excessive fluid loss can lead to severe illness and even death. Should surgical shock occur following your VASER Lipo treatment, hospitalization and additional treatment would be necessary. Individuals undergoing VASER Lipo procedures to remove large volumes of fat are at a greater risk of complications. Patients contemplating large-volume lipoplasty (greater than 5000 cc removed) may be advised to undergo post-operative monitoring and aftercare that involves overnight hospitalization.

Lidocaine Toxicity: There is the possibility that large volumes of fluid containing dilute local anesthetic drugs and epinephrine that is injected into fatty deposits during surgery may contribute to fluid overload or systemic reaction to these medications. Additional treatment including hospitalization may be necessary.

Ultrasonic Technology: Risks associated with the use of ultrasound in lipoplasty treatments include the aforementioned and the following specific risks:

Burns: Ultrasonic energy may produce burns and tissue damage if the probe touches the undersurface of the skin for prolonged periods of time. If burns occur, additional treatment and surgery may be necessary.



Probe Fragmentation: Ultrasonic energy produced within the probe(s) may cause disintegration (fragmentation) of the surgical instrument. The occurrence and effect of this is unpredictable. If this should occur, additional treatment including surgery may be necessary.

Unknown Risks: The long term effect on tissue and organs of exposure to short-duration, high-intensity ultrasonic energy is unknown. The possibility exists that additional risk factors resulting from the use of ultrasound in VASER Lipo could potentially be discovered.

Other: While we have attempted to assist you in building realistic expectations for your VASER Lipo treatment, you may be disappointed with your surgical results. However infrequent, it may be necessary in your case to perform additional surgery to improve results.

ADDITIONAL SURGERY NECESSARY

There are many variable conditions in addition to risk and potential surgical complications that may influence the long term result of VASER Lipo. Even though risks and complications are unusual, the risks cited previously are particularly associated with lipoplasty procedures utilizing suction and/or ultrasound technologies. Other complications and risks can occur but are even more uncommon. If complications should occur, additional surgery or other treatments may be necessary. The practice of medicine is not an exact science. Although good results are expected, there is no guarantee or warranty expressed or implied on the results that may be obtained.

FINANCIAL RESPONSIBILITIES

The cost of surgery involves several charges for the services provided. The total includes fees charged by your doctor, the cost of surgical supplies, anesthesia, laboratory tests, and possible outpatient hospital Charges, depending upon where the surgery is performed. Due to the proprietary nature and expense of the technology utilized, your bill may reflect a separate and additional fee for the use of VASER equipment specific to your procedure. Based upon whether the cost of surgery is covered by an insurance plan, you will be responsible for necessary copayments, deductibles, and charges not covered. As an elective, cosmetic procedure, VASER Lipo is not typically covered by insurance, placing full responsibility for payment upon the patient. You may incur additional costs should complications develop from the surgery. Secondary surgery or hospital day-surgery charges incurred due to remedial surgery are also the responsibility of the patient.



DISCLAIMER

Informed-consent documents are used to communicate information about the proposed surgical treatment of a disease or condition along with disclosure of risks and alternative forms of treatment(s). The informed consent process attempts to define principles of risk disclosure that should generally meet the needs of most patients in most circumstances.

However, informed consent documents should not be considered all inclusive in defining other methods of care and risks encountered. Your surgeon may provide you with additional or different information that is based on all the facts in your particular case and the state of medical knowledge.

Informed-consent documents are not intended to define or serve as the standard of medical care. Standards of medical care are determined on the basis of all of the facts involved in <u>an</u> individual case and are subject to change as scientific knowledge and technology advance and as practice patterns evolve. It is important that you read the above information carefully and have all of your questions answered before signing the the next page.



I have received and read the information: VASER® Lipo Informed Consent

I understand that VASER Lipo is an elective surgery procedure to remove body fat from specific area(s) of the body.

The procedure has been explained to me in a way that I understand. I have had the opportunity to ask questions, and my questions have been answered. Alternative methods of treatment have been discussed with me.

I acknowledge that no guarantee has been given by anyone as to the results that I may obtain. Although a good result is expected, I understand that there are risks to the procedure or treatment proposed, as detailed in the preceding information pages.

I consent to the administration of such anesthetics considered necessary or advisable. I understand that a/l forms of anesthesia involve risk and the possibility of complications, injury, and sometimes death.

For purposes of advancing medical education, I consent to the admittance of observers to the operating room.

I consent to the disposal of any tissue, medical devices or body parts which may be removed.

I authorize the release of my Social Security number to appropriate agencies for legal reporting and medical device registration, if applicable.

Having discussed the reasonable expectations of the VASER Lipo procedure with me and answered all of my questions to my satisfaction, I hereby authorize and such assistants as may be selected to perform VASER Lipo and any other procedure(s) that in their judgment may be necessary or advisable should unforeseen circumstances arise during surgery.

With my signature below I hereby consent to having VASER Lipo and to the above.

Please rewrite in your own handwriting: "I understand that the practice of medicine is not an exact science and although good results are expected, there can be no guarantee as to the results."

Patient Signature		Date	5/27/2020
1 attone orginature			



NSBME 0246

I certify that I, and/or a member of Vida Spa staff, have discussed all of the above with the patient and answered all questions regarding the VASER Lipo procedure. I believe the patient fully understands and all questions have been answered.

Clinician Signature	Date
I am a smoker of tobacco: I understand that tobacco smoking incre not possible, to drastically reduce the an weeks after my surgery.	eases health risks. Doctor and staff have advised me to stop smoking and, if that is nount of my smoking, and to discontinue all smoking for two weeks before and two
It has been explained to me that there is this can cause a delay in wound healing	s decreased circulation secondary to smoking of tobacco and/or marijuana and that as well as skin breakdown, skin loss and scarring.
As a smoker, I understand that the surg these complications, which may still oc	ery will have to be more conservative and less aggressive than usual to try to avoid cur, despite the doctor's best efforts to avoid them.
This has been fully explained to me an smoking habits.	d I relieve Vida Spa from any responsibility related to the increased risks from my
Patient Signature _	Date 5/27/2000
I am a non-smoker of tobacco):
Patient Signature	
I do not use social drugs. Patient Signature	
Patient name (please print):	A
DOB: 5 29 7020	
Requested By:	
Patient Initials:	7



I, the above-named patient, hereby consent that photographs, videotape, and/or computer imaging may be taken of me or of parts of my body under the following conditions:

Pre- and post-operative photographs will be taken of my treatment for record purposes. The photographs will be taken by my physician or a photographer approved by my physician. I understand that these photographs will be the property of the attending physician and Vida Spa.

I understand that all computer imaging viewed is only a representation of the result that could be achieved through this procedure and that imaging is used as an educational tool to benefit the patient without guarantee of any result.

I have had the opportunity to discuss this consent with my surgeon and agree that all of my questions have been answered. This authorization is granted in furtherance of medical education and other good and valuable consideration and as a voluntary contribution. I hereby waive all rights I might have to photographs, videotape, and computer images and do hereby release, discharge, and save harmless Vida Spa and their employees and agents from all claims and liabilities whatsoever in law and in equity arising from such use.

I have read and fully understand and consent to all the above items contained in this form.

Patient Signature	Date 5 27 2020
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EXHIBIT 12

EXHIBIT 12

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HI WE ARE FROM VIDA SPA, WE WOULD LIKE TO KNOW HOW WAS YOUR TREATMENT, PLEASE LET US KNOW AND THANK YOU AGAIN FOR COMING.	E TO KNOW HOW WAS AND THANK YOU AGAIN
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Vida Spa 702-202-\$\$3050

Aeliver to: 3225 S. Rambow Blvd
Las Vegas NV 89146

Appointment Cancellation Policy For Vida Spa

The fees quoted for cosmetic procedures and surgeries are inclusive of the following:

Pre-operative exam, surgeon fees, materials, anesthesia, operating facility, and post-operative visits.

If additional corrective surgery or elective aesthetic correction is desired, there will be additional surgeon, facility, and material fees incurred.

In office treatments such as Botox, Voluma, Juvederm, Dysport, Restylane, or other filler materials, chemical peels, Asclera therapy, and other similar therapies are priced on a pre-treatment basis or package option and additional cost is possible based on consumption.

Office treatments and services are payable in full at the time of your appointment.

If you elect to have a procedure or surgery and would like to secure the date that works best for your schedule, a 50% deposit of the surgeon fees is required to secure your date. The full balance is due two weeks prior to surgery. If your surgical booking is within two weeks of surgery, then payment is due in full.

There is a non-refundable administrative cancellation fee of \$1000 if you decide to cancel your procedure or surgery once your date has been secured and payment is accepted in our office. Additionally, should your scheduled procedure/surgery be cancelled, the following applies:

Cancellation 8-14 days prior to scheduled procedure/surgery date will result in 25% loss of fees. Cancellation 7-2 days prior to scheduled procedure/surgery date will result in 50% loss of fees. Cancellation made the day before or day of scheduled procedure/surgery date will result in 100% loss of fees.

By signing this form, I acknowledge that I understand The Vida Spa's Patient Policies. I agree to be personally responsible for all payments due for my medical/surgical care.

	6-05-2020
Patient/ Responsible Party's Signature	Date
Print Name	

Vida Spa 3225 S Rainbow Blvd, #107 Las Vegas, NV 89146

Consent for Surgery and Procedures

I,, desire the doctor, PA, and such qualified	nurses and assistants as may be
assigned, to perform the elective procedure(s) of:	pu eri
liposuction of abdomen flanks, fat transfer	to diverpos
back bra-straparely and fat fransfer to buttock	2 Doe
The nature and purpose of the operation(s) and procedure(s), possible alternative n	nethods of treatment, including
to treatment/surgery, risks and possible complications have been fully explained to me by V	/ida Spa. doctor, PA, and such
nurses and assistants as assigned. I have been advised that all surgery involves general risks	s, including but not limited to
bleeding, infection, nerve or tissue damage, and rarely, cardiac arrest, death, or other seriou	is bodily injury. I acknowledge
that no guarantees or assurances have been made as to the results that may be obtained.	
I understand that anesthesia may be given, and that it, too, carries risks. I consent t	to the administration and use of
anesthesia as the doctor, PA, and such qualified nurses and assistants as may be assigned, as the doctor, PA, and such qualified nurses and assistants as may be assigned, may deem as	nd to the use of such anesthesia
It has been explained to me that during the course of the operation unforeseen cond	dvisable.
necessitate an extension of the original procedure, and I hereby authorize the doctor, PA, an	ditions may be revealed that
assistants as may be assigned, to perform such procedures as are necessary and/or desirable	id such qualified nurses and
service of pathologists, radiologists, laboratory, or medical centers. The authority granted in	s this personal about 1 miled to the
treating conditions that are not known to my providers at the time the operation commences	cuits paragraph shan extend to
I understand that photography is important in planning and evaluating surgery, and	1 Luive permission for
photographs and or videos to be taken before, during, and after my surgery and/or procedur	e I give consent to use such
media for:	c. 1 give consent to use such
(Check all you consent to)documentation purposesin office patient teaching	advertising and PR
I agree to keep Vida Spa, the doctor, PA, and such qualified nurses and assistants a	is may be assigned, informed of
any change in my permanent address so they can inform me of any important new findings	relating to my surgery and/or
procedure(s). I further agree to cooperate with in my aftercare until I am discharged from sa	aid surgery and/or procedure(s)
care.	
In signing this consent, I hereby certify that I understand the risks, benefits, and all	ternatives to my procedure(s) as
that I have discussed them with the doctor and/or PA. I, the patient have been advised and u	inderstand that there are inheren
risks in the medical services to be provided, which I have voluntarily elected to undergo. I,	the patient, forever release and
forever discharge the doctor, PA, nurses, assistants, Vida Spa, shareholders, directors, office	ers, employees, agents, and
representatives, whatsoever, from and hereby waive all actions, lawsuits, obligations, damage whatsoever are a second and the second actions are second as a second action of the second actions are second as a second action of the second actions are second as a second action of the	ges, losses, and claims.
whatsoever arising out of or relating to, directly or indirectly, the medical services to be pro	ovided including, without
limitation, as a result of the actions, including negligence, of the doctor, PA, nurses, assistar	nts. Vida Spa, its shareholders,
directors, officers, employees, agents, and representatives.	
The patient acknowledges, by signature below, understanding of, and has had the oppositions of this agreement, including the release from link like with his discontinuous	opportunity to discuss the
provisions of this agreement, including the release from liability, with his/her counsel, whet prior to the execution of this agreement.	ther or not they have done so.
Please do not give your permission or sign this consent form if you have any quest	dana
procedure(s). Please advise a staff member of these questions or concerns so arrangements	nons regarding your
to discuss them with you.	can be made for the doctor or Pa
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Printed name: Relationship to patient	t:
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Witness: Maugela Kyan W Date:	6/5/20
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NSBME 0252

Patient Information

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Medication:		Reaction:			
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Family History: Has a	nyone in your famil	y had any of the followin	g conditions? (Check if	ves and indicate relat	ionabia da)
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BLEEDING PROBLEMS DO YOU BRUISE OR BLEED EASILY? YES NO (WIT						
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DO YOU HAVE A FAMILY HISTORY OF BLEEDING PROBLEMS'	EXPLAIN					
DIFFICULTIES WITH LOCAL OR GENERAL ANESTH						
EXPLAIN	name to a statement of the					
HAVE YOU EVER HAD A BLOOD TRANSFUSION?		MO				
ARE YOU PREGNANT?	YES	NO				
		•				
HAVE YOU EVER HAD, HAVE OR BEEN EXPOSED TO	(PLEASI	E CIRCLE	YES OR	NO)		
YES NO INTRAVENOUS DRUGS YES NO INFECTIOUS DISEASES		YES	NO	HEPATITIS		
YES NO TB		YES	NO	HIV / AIDS		
F YES TO ANY EXPLAIN		YES	МО	LIVER TRANSPLANT		
The state of the s	• ,					
The state of the s						
125						
Review of Systems: Do you						
Review of Systems: Do you currentl	y have an	y of the fo	llowing sy	mptoms or conditions (Check if yes)		
☐ Weight loss – How muchibs			Care	flovascular: Nothing in this group		
Loss of Appetite				hest pain	i	
f	Fever		□ P	alpitations		
Chills		□н	☐ Heart valve problems			
			□ c	alf pain with walking		
☐ Night Sweats				eg swelling		
☐ Fainting Spells						
Eyes: Nothing in this group			Resp	iratory: Nothing in this group		
Eye disease or injury			1	ronic cough		
☐ Wear glasses or contacts			1	oughing up blood		
☐ Blurred or double vision			1	☐ Short of breath with activity		
				ort of breath lying flat		
Ear, Nose, Mouth, Throat: Nothing in th	is group		- 1	heezing		
☐ Hearing loss			☐ As	•		
☐ Ear ache / infection			1 -	onchitis		
☐ Ringing in ears						
☐ Nose Bleeds				eumonia		
☐ Bleeding gums			Musc	uloskeletal: Nothing in this group		
☐ Mouth sores			1	nt pain		
☐ Sore throat			rth	itis		
Recent voice change			□ Ba	ck pain		
Runny nose / cold			1	scle weakness		
☐ Sinus problems			120	pain with walking		
☐ Neck stiffness / pain				pain at rest		
☐ Enlarged neck glands / massag			1	ken hones		

Digestive: ☐ Nothing in this group	Neurological: Nothing in this group
☐ Loss of appetite	Frequent headaches
☐ Difficulty swallowing	☐ Migraines
☐ Early satiety (fill up easy)	☐ Weakness
☐ Heartburn	☐ Seizures
☐ Nausea	☐ Stroke
☐ Vorniting	Paralysis
☐ Diarrhea	☐ Decreased sensation
☐ Constipation	☐ Difficulty with speech
☐ Blood in stool	Dizziness
☐ Dark, tarry stools	
☐ Abdominal pain	Psychiatric: Nothing in this group
Painful bowel movements	☐ Anxiety
☐ Poor control of BMs, urgency	Depression
	☐ Mood swings
Urinary: Nothing in this group	☐ Phobias, fears
Burning with urination	☐ Panic attacks
☐ Weak urine stream	☐ Suicide thoughts or attempts
☐ Blood in urine	
☐ Gas or stool in urine	Endocrine: Nothing in this group
☐ Poor control, leakage of urine	☐ Heat or cold intolerance
☐ Kidney stones	Excessive thirst
☐ Prostate problems	Excessive urination
☐ Testicular mass	Excessive Sweating
Get up at night to urinate - Number of times per night	_
Gynecologic (female): Nothing in this group	Hernatologic, Lymphatic: [] Nothing in this group
☐ Irregular periods - Last period:	Prior blood transfusion
☐ Abnormal vaginal discharge	☐ Easy bleeding or bruising
	Low red blood cell count (anemia)
Breast: Nothing in this group	Low white blood cell count
☐ Breast lump	☐ Prolonged bleeding with cuts, surgery
☐ Breast pain	Swollen glands
☐ Nipple discharge	☐ Blood clots
	Use of blood thinners
Skin: Nothing in this group	Swollen lymph nodes
Rash	and the second s
Skin infections	Allergic, Immunologic: Nothing in this group
Ulcers or sores	HIV infection
☐ Yellowing of the skin	☐ Hepatitis
☐ Eczema, psoriasis, other	☐ Imune deficiency
☐ Pyoderma gangrenosum, erythema nodosum	Antibiotics needed for dental work
	The state of the s



Patient Profile							
Name:			Date:				
Address:			City:				
State: Zip:			Home Phone				
Work Phone:			Cell Phone:				
Age: 40 DOE	3		Preferred Co				
Occupation:	rade	(05	C Employer:			T-10	
SSN:			Driver's Lice	ense:			
Email:							
Medical Questionnaire							
Medical History		(Please	circle yes or no)				
Diabetes High Blood Pressure Heart Attack Heart Disease Multiple Sclerosis Epilepsy Hepatitis Bowel Problems Prostate Cancer Sexually Transmitted Blood Transfusion Tuberculosis Other	Yes	No N	High Cholest Coronary He Blocked Arte Stroke/TIA Parkinson's o Liver Disease Kidney Disea Prostate Dise Peyronie's D HIV Infection Major Depre Bleeding Dis	art Disease erry disease e ase ase (BPH) isease n/AIDS ssion order	Yes	No N	
Surgery Heart Yes Prostate Yes	No No		Blocked Artery	Yes	No	***	
Bowel Yes	No		Bladder	Yes Yes	No No		
Hemia Yes Scrotum/Test Yes Other	No No		Vasectomy Spine	Yes Yes	No No		

Previous Urology	7 1 1 0 0 10	ems					
Kidneys	Yes	No	Penis		Voc	۸,	
Bladder Prostate	Yes	NO	Testic	les	Yes Yes	No No	
riostate	Yes	AVO.	Urine		Yes	No	
<u>Injuries</u>						1	
Head	Yes	No	Back			,	
Pelvis	Yes	No	Penis		Yes	No	
Other					Yes	No	
History of Recrea	tion_1 /	1 . 4* *.*					
Alcohol?	No	Yes	H 00 0				
Smoking?	No	Vec	How Often? How Much?				
Recreational Drug	g: Marii	uana. Co	Caine Meth etc?	No. V.			
	- ,	, , ,	oumo, wiem, etc:	yes. I	How Ofter	1?	
Family History							,
Diabetes		Yes	W				
Cancer of the Pros	state	Yes	No Premat	ure Heart Attack		Ng	
	,,,,,,	1 03	High B	Blood Pressure	Yes	ŊΌ	
						C.	
Social History:							
Marital Status: 5	Single	Married	Divorced Se	paratod W.J.	ved		
	_	-		טמומנכנו שוחחו			
	_	1		_			
	٠	Inactive		derate Heavy			
Physical Activity:	~ «	Inactive	Light Moo	derate Heavy			
Physical Activity:	~ «	Inactive	Light Moo	derate Heavy	,		
Physical Activity: <u>Allergies</u> Have you ever had	an alle	Inactive	Light Moo	derate Heavy			
Physical Activity: <u>Allergies</u> Have you ever had	an alle	Inactive	Light Moo	derate Heavy	,		
Physical Activity: <u>Allergies</u> Have you ever had	an alle	Inactive	Light Moo	derate Heavy	,		
Physical Activity: Allergies Have you ever had If yes, please provi	an alle	Inactive	Light Moo	derate Heavy	,		
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Physical Activity: Allergies Have you ever had f yes, please provi	an alle	Inactive	Light Moo	derate Heavy	,	У	Last Visit
Physical Activity: Allergies Have you ever had f yes, please provi	an alle	Inactive rgic react ils:	Light Moo	derate Heavy ations? Yes Phone	No Specialt	-	Last Visit
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Physical Activity: Allergies Have you ever had If yes, please provi	an alle	Inactive rgic react ils: ht physici Name	Light Mod	derate Heavy ations? Yes Phone	No Specialt		
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Physical Activity: Allergies Have you ever had If yes, please provi Please provide your Family Physician Specialist Specialist	an alle	Inactive rgic react ils: ht physici Name	Light Mod	derate Heavy ations? Yes Phone	No		
Physical Activity: Allergies Have you ever had If yes, please provi Please provide your Family Physician Specialist Specialist General Surgery OOB:	an alle ide deta r currer	Inactive rgic react ils: ht physici Name	Light Modication to any medication ans: STORY FORM	derate Heavy ations? Yes Phone	No Specials		
Physical Activity: Allergies Have you ever had If yes, please provi Please provide your Family Physician Specialist Specialist General Surgery OOB:	an alle ide deta r currer	Inactive rgic react ils: ht physici Name	Light Modication to any medication ans: STORY FORM	derate Heavy ations? Yes Phone	No Specials		
Physical Activity: Allergies Have you ever had If yes, please provi Please provide your Family Physician Specialist Specialist Seneral Surgery OOB:	an alle ide deta r currer	Inactive rgic react ils: ht physici Name	Light Modication to any medication ans: STORY FORM	derate Heavy ations? Yes Phone	No Specials		

Medication Dose Frequency Social History: Occupation:	_ Medication Dose Frequency
Marital Status: Single Married Divorced Widowed Tobacco Use: # years	all that apply: Coffee Tea Soda)
Often) Medical History: HTN Hear Anxiety Depression Asthma GERD Cancer Other:	t Disease Diabetes Stroke
History: Appendectomy Cholecystectomy Thyroidectomy Hemorr Hysterectomy Breast Surgery Tubal litigation Colonoscopy Herni	Surgical hoidectomy Mammogram a Repair (location/type)
Other:	
Physician should be made aware of:	n/concerns which you think the
Diabetes Heart Disease HTN Cancer Other Mother F. Grandfather Grandmother Aunt Uncle	ather Sister Brother



VASER LIPO INFORMED CONSENT

This is an informed-consent document that has been prepared to help educate you on the VASER Lipo procedure, its risks, and alternative treatment.

It is important that you read this information carefully and completely. Please initial each page, indicating that you have read the page, and sign the Consent for Surgery as proposed by your surgeon.

VASER Lipo is a surgical technique to remove unwanted deposits of fat from specific areas of the body, including the face and neck, upper arms, upper and lower back, abdomen, buttocks, hips, inner and outer thighs, knees, calves, and ankles. This is not a substitute for weight reduction, but a method for removing localized deposits of fatty tissue. VASER Lipo may be performed as a primary procedure for body contouring or may be combined with other surgical techniques.

The best candidates for VASER Lipo are individuals of relatively normal weight who have excess fat in particular body areas. Having firm, elastic skin will result in a better final contour after lipoplasty. Skin that has diminished tone due to stretch marks, weight loss, or natural aging will not reshape itself to the new contours and may require additional surgical techniques to remove and tighten excess skin. Body-contour irregularities due to structures other than fat cannot be improved by this technique. Lipoplasty itself will not improve areas of dimpled skin known as "cellulite".

The VASER Lipo procedure is performed utilizing advanced proprietary technology. A patented grooved solid metal probe is first inserted through one or more small skin incisions. Ultrasonic energy emitted from the sides and end of the probe as it is passed back and forth breaks down fatty deposits. A hollow metal surgical instrument known as a cannula is then inserted and is directed through the area of emulsified fat cells. The cannula is attached to a vacuum source, which provides gentle suction to remove the emulsified fat. Because the VASER Lipo procedure is unique in that it first targets and dissolves fat cells and then draws out emulsified fat, leaving the collagen matrix intact, surgical trauma, complications and the potential for post-operative pain and bruising are minimized while skin retraction is optimal.

VASER Lipo may be performed under local or general anesthesia and requires the infiltration of fluid containing dilute local anesthetic and epinephrine into areas of fatty deposits. This technique can reduce discomfort at the time of surgery, as well as reduce post-operative bruising.

Support garments and dressings are worn after surgery to control potential swelling and promote healing, to provide comfort and support, and to help skin better fit new body contours. Your surgeon may recommend that you make arrangements to denate a unit of your own blood that would be used if a blood transfusion were necessary after surgery.

ALTERNATIVE TREATMENT

Alternative forms of management include not treating the areas of fatty deposits, and diet and exercise regimens that may be of benefit in the overall reduction of excess body fat. Direct removal of excess skin and fatty tissue may be necessary in addition to lipoplasty in some patients. Risks and potential complications are associated with alternative forms of treatment that involve surgery.

Patient Initials: A L

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RISKS AND SIDE EFFECTS

Every surgical procedure involves a certain amount of risk, and it is important that you understand the risks involved with the VASER Lipo procedure. An individual's choice to undergo a surgical procedure is based on the comparison of the risk to potential benefit. Although the majority of patients do not experience these complications, you should discuss each of them with your surgeon to make sure you understand the risks, potential complications, and consequences of VASER Lipo.

Patient Selection: Individuals with poor skin tone, medical problems, or unrealistic expectations may not be candidates for VASER Lipo.

Allergic Reactions: Rarely, local allergies to tape, suture material, or topical preparations utilized in hipoplasty procedures have been reported. More serious systemic reactions due to drugs administered during surgery and prescription medicines may require additional treatment.

Asymmetry: Due to factors such as skin tone, bony prominence, and muscle tone, which can contribute to normal asymmetry in body features, it may not be possible to achieve symmetrical body appearance through lipoplasty procedures.

Bleeding: While unusual, it is possible to have a bleeding episode during or after surgery. Should post-operative bleeding occur, it may require emergency treatment to drain accumulated blood or require a blood transfusion. Non-prescription herbs and dietary supplements can increase the risk of surgical bleeding. Do not take any aspirin or anti-inflammatory medications for 2 weeks before surgery, as this may increase the risk of bleeding. Please review our Medication Alert for products and ingredients to be avoided for 2 weeks prior to and 2 weeks following your scheduled VASER Lipo procedure, and consult your doctor before taking anything.

Change in Skin and Skin Sensation: A temporary decrease in skin sensation may occur following VASER Lipo. This usually resolves over a period of time. Diminished or complete loss of skin sensation that does not totally resolve could potentially occur, as it infrequently has with various lipoplasty procedures.

Chronic Pain: Chronic pain and discomfort following VASER Lipo is unusual, but possible.

Infection: Infection is uncommon following this type of surgery. Should an infection occur, treatment with antibiotics or additional surgery may be necessary. Although extremely rare, life-threatening infections such as toxic shock syndrome could occur after lipoplasty surgery, regardless of the technology utilized.

Pulmonary and Systemic Complications: In extremely rare cases, fat droplets could become trapped in the lungs to create a possibly fatal complication called fat embolism syndrome. Pulmonary complications may occur secondarily to blood clots (pulmonary emboli) or partial collapse of the lungs after general anesthesia. Should either of these complications occur, you may require hospitalization and additional treatment. In some circumstances, pulmonary emboli can be life-threatening or fatal.

Long-term Effects: Subsequent alterations in body contour may occur as a result of aging, weight loss or gain, pregnancy, or other circumstances not related to VASER Lipo.





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Scarring: Although the incisions created for VASER Lipo are minimal and good wound healing after a surgical procedure is expected, abnormal scars may occur within the skin and deeper tissues in rare cases. Such scars may be unattractive and of a different color than the surrounding skin. Additional treatments, including surgery, may be necessary to treat abnormal scarring.

Seroma: While VASER Lipo has reduced the incidence and severity of seromas associated with lipoplasty procedures, such fluid accumulation is possible and could require additional treatments or surgery to promote drainage.

Bruising and/or Swelling: Although VASER Lipo typically reduces or eliminates bruising and swelling normally resulting from lipoplasty procedures, bruising and swelling may occur and, in rare situations, persist for extended periods of time.

Skin Contour Irregularities: Since VASER Lipo selectively targets fat cells, leaving other essential tissues intact, skin contour irregularities and depressions in the skin are unlikely but possible. Visible and palpable wrinkling of skin can occur, particularly when large quantities of fat cells are removed and/or the skin is lacking good elasticity. Post-operative skin contour irregularities could necessitate additional treatments including surgery.

Skin Loss: Additional treatments including surgery could be necessary in the unlikely event that skin loss occurs following your VASER Lipo treatment.

Surgical Anesthesia: All forms of surgical anesthesia or sedation, whether administered locally or generally, carry risks including the possibility of complications, injury, and even death. You will probably be required to sign a separate anesthesia consent form in preparation for your surgery.

Surgical Shock: VASER Lipo could conceivably cause severe trauma, particularly when multiple or extensive areas are treated in a single session. Although serious complications are a rarity, infections or excessive fluid loss can lead to severe illness and even death. Should surgical shock occur following your VASER Lipo treatment, hospitalization and additional treatment would be necessary. Individuals undergoing VASER Lipo procedures to remove large volumes of fat are at a greater risk of complications. Patients contemplating large-volume lipoplasty (greater than 5000 cc removed) may be advised to undergo post-operative monitoring and aftercare that involves overnight hospitalization.

Lidocaine Toxicity: There is the possibility that large volumes of fluid containing dilute local anesthetic drugs and epinephrine that is injected into fatty deposits during surgery may contribute to fluid overload or systemic reaction to these medications. Additional treatment including hospitalization may be necessary.

Ultrasonic Technology: Risks associated with the use of ultrasound in lipoplasty treatments include the aforementioned and the following specific risks:

Burns: Ultrasonic energy may produce burns and tissue damage if the probe touches the undersurface of the skin for prolonged periods of time. If burns occur, additional treatment and surgery may be necessary.

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Patient	Initials:	M	L



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Probe Fragmentation: Ultrasonic energy produced within the probe(s) may cause disintegration (fragmentation) of the surgical instrument. The occurrence and effect of this is unpredictable. If this should occur, additional treatment including surgery may be necessary.

Unknown Risks: The long term effect on tissue and organs of exposure to short-duration, high-intensity ultrasonic energy is unknown. The possibility exists that additional risk factors resulting from the use of ultrasound in VASER Lipo could potentially be discovered.

Other: While we have attempted to assist you in building realistic expectations for your VASER Lipo treatment, you may be disappointed with your surgical results. However infrequent, it may be necessary in your case to perform additional surgery to improve results.

ADDITIONAL SURGERY NECESSARY

There are many variable conditions in addition to risk and potential surgical complications that may influence the long term result of VASER Lipo. Even though risks and complications are unusual, the risks cited previously are particularly associated with lipoplasty procedures utilizing suction and/or ultrasound technologies. Other complications and risks can occur but are even more uncommon. If complications should occur, additional surgery or other treatments may be necessary. The practice of medicine is not an exact science. Although good results are expected, there is no guarantee or warranty expressed or implied on the results that may be obtained.

FINANCIAL RESPONSIBILITIES

The cost of surgery involves several charges for the services provided. The total includes fees charged by your doctor, the cost of surgical supplies, anesthesia, laboratory tests, and possible outpatient hospital Charges, depending upon where the surgery is performed. Due to the proprietary nature and expense of the technology utilized, your bill may reflect a separate and additional fee for the use of VASER equipment specific to your procedure. Based upon whether the cost of surgery is covered by an insurance plan, you will be responsible for necessary copayments, deductibles, and charges not covered. As an elective, cosmetic procedure, VASER Lipo is not typically covered by insurance, placing full responsibility for payment upon the patient. You may incur additional costs should complications develop from the surgery. Secondary surgery or hospital day-surgery charges incurred due to remedial surgery are also the responsibility of the patient.

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DISCLAIMER

Informed-consent documents are used to communicate information about the proposed surgical treatment of a disease or condition along with disclosure of risks and alternative forms of treatment(s). The informed consent process attempts to define principles of risk disclosure that should generally meet the needs of most patients in most circumstances.

However, informed consent documents should not be considered all inclusive in defining other methods of care and risks encountered. Your surgeon may provide you with additional or different information that is based on all the facts in your particular case and the state of medical knowledge.

Informed-consent documents are not intended to define or serve as the standard of medical care. Standards of medical care are determined on the basis of all of the facts involved in an individual case and are subject to change as scientific knowledge and technology advance and as practice patterns evolve. It is important that you read the above information carefully and have all of your questions answered before signing the the next page.

Patient Initials: A L

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I have received and read the information: VASER® Lipo Informed Consent

I understand that VASER Lipo is an elective surgery procedure to remove body fat from specific area(s) of the body.

The procedure has been explained to me in a way that I understand. I have had the opportunity to ask questions, and my questions have been answered. Alternative methods of treatment have been discussed with me.

I acknowledge that no guarantee has been given by anyone as to the results that I may obtain. Although a good result is expected, I understand that there are risks to the procedure or treatment proposed, as detailed in the preceding information pages.

I consent to the administration of such anesthetics considered necessary or advisable. I understand that all forms of anesthesia involve risk and the possibility of complications, injury, and sometimes death.

For purposes of advancing medical education, I consent to the admittance of observers to the operating room.

I consent to the disposal of any tissue, medical devices or body parts which may be removed.

I authorize the release of my Social Security number to appropriate agencies for legal reporting and medical device registration, if applicable.

Having discussed the reasonable expectations of the VASER Lipo procedure with me and answered all of my questions to my satisfaction, I hereby authorize and such assistants as may be selected to perform VASER Lipo and any other procedure(s) that in their judgment may be necessary or advisable should unforeseen circumstances arise during surgery.

With my signature below I hereby consent to having VASER Lipo and to the above.

Please rewrite in your own handwriting: "I understand that the practice of medicine is not an exact science and although good results are expected, there can be no guarantee as to the results."

Patient Signature Date 6-5-20

Patient Initials: A L



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I certify that I, and/or a member of Vida Spa staff, have discussed all of the above with the patient and answered all questions regarding the VASER Lipo procedure. I believe the patient fully understands and all questions have been answered.

Clinician SignatureDate	20
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I am a smoker of tobacco:

I understand that tobacco smoking increases health risks. Doctor and staff have advised me to stop smoking and, if that is not possible, to drastically reduce the amount of my smoking, and to discontinue all smoking for two weeks before and two weeks after my surgery.

It has been explained to me that there is decreased circulation secondary to smoking of tobacco and/or marijuana and that this can cause a delay in wound healing as well as skin breakdown, skin loss and scarring.

As a smoker, I understand that the surgery will have to be more conservative and less aggressive than usual to try to avoid these complications, which may still occur, despite the doctor's best efforts to avoid them.

This has been fully explained to me and I relieve Vida Spa from any responsibility related to the increased risks from my smoking habits.

Patient Signature _	Date_6-5-20
I am a non-smoker of tobacco:	
-Patient Signature	
I do not use social drugs.	
Patient Signature	
Patient name (please print):	
DOB:	
Requested By:	
	7



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I, the above-named patient, hereby consent that photographs, videotape, and/or computer imaging may be taken of me or of parts of my body under the following conditions:

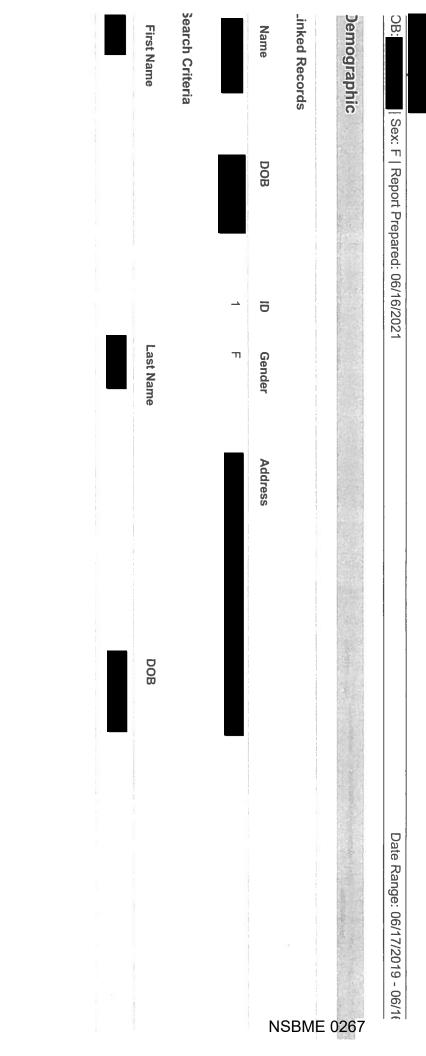
Pre- and post-operative photographs will be taken of my treatment for record purposes. The photographs will be taken by my physician or a photographer approved by my physician. I understand that these photographs will be the property of the attending physician and Vida Spa.

I understand that all computer imaging viewed is only a representation of the result that could be achieved through this procedure and that imaging is used as an educational tool to benefit the patient without guarantee of any result.

I have had the opportunity to discuss this consent with my surgeon and agree that all of my questions have been answered. This authorization is granted in furtherance of medical education and other good and valuable consideration and as a voluntary contribution. I hereby waive all rights I might have to photographs, videotape, and computer images and do hereby release, discharge, and save harmless Vida Spa and their employees and agents from all claims and liabilities whatsoever in law and in equity arising from such use.

I have read and fully understand and consent to all the above items contained in this form.

Patient Signature	Date	
_	Date	



NARXCARE SCORES

Narcotic Sedative Stimulant 020 020 000

OVERDOSE RISK SCORE

(Range 000-999)

ADDITIONAL RISK INDICATORS (0)

110

efusing to provide medications. The information on this report is not warranted as accurate or complete. or the prescriber. NarxCare scores and reports are intended to aid, not replace, medical decision making. None of the information presented should be used as sole justification for providing or This NarxCare report is based on search criteria supplied and the data entered by the dispensing pharmacy. For more information about any prescription, please contact the dispensing pharmacy

Graphs

FORMATION GRAPH

îmeline ¹rescribers - Salvador G Borrom

06/16

2m

6m

1y ___

24

hresholds meant for opioids prescribed for pain. Buprenorphine products have no agreed upon morphine equivalency, and as partial opioid agonists, are not expected to be associated with Q werdose risk in the same dose-dependent manner as doses for full agonist opioids. MME = morphine milligram equivalents. LME = Lorazepam milligram equivalents. MG = dose in milligram agonists in milligram agonists.

LME = Lorazepam milligram equivalents. MG = dose in milligram agonists in milligram agonists.

LME = Lorazepam milligram equivalents. MG = dose in milligram agonists. Per CDC guidance, the MME conversion factors prescribed or provided as part of the medication-assisted treatment for opioid use disorder should not be used to benchmark against dosagneed to be used to be used

îmeline				orazepam MgEq (LME)		imeline				orphine MgEq (MME)		imeline				uprenorphine mg
	02	10	18	ΛgEq (LME)			0	200 80	320	JEq (MME)			0 4	16	28	ine mg
06/16						06/16						06/16				
2m						2m						2m				
6m						6m						6m				
14	-					1y						1y				
24						N										
V						2y						2y				

Summary						9
Summary		Narcotics * (excluding buprenorphine)	buprenorphine)	Sedatives		Buprenorphine
Total Prescriptions:	2	Current Qty:	0	Current Qty:	0	Current Qty:
Total Prescribers:	-	Current MME/day:	0.00	Current mg/day:	0.00	Current mg/day:
		30 Dav Avg MME/dav:	0.00	30 Day Avg mg/day:	0.00	30 Day Avg mg/day:

Total Prescriptions:	tions:	N		Current City:	C			Culterit City.		, (כשוופות שנץ.	-	2
Total Prescribers:	ers:	-		Current MME/day:	0.00			Current mg/day:	Ÿ.	0.00		Current mg/day:	day:	0.00
Total Pharmacies:	cies:	>		30 Day Avg MME/day:	0.00			30 Day Avg mg/day:	g/day:	0.00		30 Day Avg mg/day	mg/day:	0.00
rescriptions	ร													
Fill Date	ō	Written	Sold	Drug		Qty	Days	Prescriber	Rx#	Pharmacy	Refill	Daily Dose * Pymt Type	Pymt Type	PM
06/04/2020	_	06/04/2020	06/04/2020	06/04/2020 1 06/04/2020 06/04/2020 Alprazolam 1 Mg Tablet		4.00	2	Sa Bor	64882	San (8003) 0/0	0/0	4.00 LME	Private Pay	N
06/04/2020	>	06/04/2020	06/04/2020	06/04/2020 1 06/04/2020 06/04/2020 Oxycodone-Acetaminophen 5-325		12.00	ω	Sa Bor	64881	64881 San (8003) 0/0	0/0	30.00 MME	Private Pay	N

Name	Address	City	State	Zipcode	Phone
Salvador G Borromeo, lii	4200 W Charleston Blvd Bldg A	Las Vegas	N	89102	(702) 202-3050

Name	Address	City	State	Zipcode	Phone
Santa Maria Pharmacy (8003)	3827 E Sunset Rd Ste L	Las Vegas	N	89120	(702) 474-0268

Disclaimer

harmacies

rescribers

Report contents are based on data entered by dispensers and their staff, and may contain errors. The Board of Pharmacy recommends independent verification with dispensers when prudent or necessary. Willful disclosure of prescription information may be subject to disciplinary action, civil penalties or criminal action.

EXHIBIT 13

EXHIBIT 13

Daily Procedures

VIDA SPA 01/01/2019 - 12/14/2020 Tam

	12/14/20	020						
	Date	Patient Name	Code	Tooth	Description	Provider	F	ee
	/2019		D9986		missed appointment	Tam	•	0.00
	/2019		D9986		missed appointment	Tam		0.00
	/2019		C101		Consultation	Tam		0.00
	/2019		DF		DEEP CLEANSING FACI	Tam		250.00
	/2019		0204		PRP HAIR	Tam		125.00
	/2019		0205		PRP/ Microneedle	Tam		350.00
	/2019		0206		PRPHANDS	Tam		499.00
	/2019		D9986		missed appointment	Tam		0.00
	/2019		LIPO C		LIPO CONSULT	Tam		0.00
10/16			D9986		missed appointment	Tam		0.00
10/16			LIPO C		LIPO CONSULT	Tam		0.00
10/16,			LIPO C		LIPO CONSULT	Tam		0.00
	/2019		D9986		missed appointment	Tam		0.00
	/2019		D9986		missed appointment	Tam		0.00
10/16,			LIPO C		LIPO CONSULT	Tam		0.00
10/16,			D9986		missed appointment	Tam		0.00
10/16,			V102	1	Vein- Body Area 1 Sessi			700.00
10/18,			B2		TEETH W AND FACIAL	Tam		100.00
10/18			LIPO C		LIPO CONSULT	Tam		0.00
10/18			SML	NEI EG	VASER LIPO	Tam	1	,800.00
10/21,			D9986		missed appointment	Tam	1	0.00
10/21/			C101		Consultation	Tam		0.00
10/22/			D9986		missed appointment	Tam		0.00
10/22/			LIPO C		LIPO CONSULT	Tam		0.00
10/22/			LIPO C		LIPO CONSULT	Tam		0.00
10/22/			C101		Consultation	Tam		0.00
10/22/			VERSA		LIP FILLERS VERSA	Tam		550.00
10/22/			C101		Consultation	Tam		0.00
10/22/			V102	1	Vein- Body Area 1 Sessi			350.00
10/23/			D9986		missed appointment	Tam		0.00
10/23/			D9986		missed appointment	Tam		0.00
10/24/			V102	1	Vein- Body Area 1 Sessi			350.00
10/24/			D9986		missed appointment	Tam		0.00
10/24/			LIPO C		LIPO CONSULT	Tam		0.00
10/24/			D9986		missed appointment	Tam		0.00
10/24/			D9986		missed appointment	Tam		0.00
10/24/			D9986		missed appointment	Tam		0.00
10/24/			MESOTHER		MESOTHERAPY	Tam		150.00
10/24/			LIPO C		LIPO CONSULT	Tam		0.00
10/24/			C101		Consultation	Tam		0.00
10/24/			00203		BOTOX	Tam		0.00
10/24/			00203		BOTOX	Tam		250.00
10/24/			FILLER TE		FILLER TEARDROP	Tam		499.00
10/24/			00203		BOTOX	Tam		540.00
10/24/			FILLER TE		FILLER TEARDROP	Tam		600.00
10/25/			LIPO C		LIPO CONSULT	Tam		0.00
10/25/			00203		ВОТОХ	Tam		250.00
10/26/			LIPO C		LIPO CONSULT	Tam		0.00
10/29/			V102	1	Vein- Body Area 1 Sessi			350.00
10/29/			00203		ВОТОХ	Tam		300.00
10/29/			F0203		FILLER RADIESSE	Tam		700.00
10/29/	2019		FILLER TE		FILLER TEARDROP	Tam		500.00
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Date Patient Name Code Tooth Description Provider Fee 10/29/2019 10/29/2019 10/29/2019 10/29/2019 10/29/2019 10/29/2019 10/29/2019 SML VASSER LIPO CONSULT Tam 0.00 10/30/2019 10/30/2019 10/10 10/30/2019 10/10 10/30/2019 10/10 10/30/2019 10/10 10/30/2019 10/10 10/30/2019 10/10 10/30/2019 10/10 10/30/2019 10/10 10/30/2019 10/10 10/30/2019 10/10 10/30/2019 10/10 10/30/2019 10/10 10/30/2019 10/10 10/30/2019 10/10 10/10 10/30/2019 10/10 10/10 10/30/2019 10/10		Date: 12/14/202	20					
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06/03/2020								
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Date:	12	/14	/2020

Date: 12/17/20	120					
Date	Patient Name	Code	Tooth	Description	Provider	Fee
06/03/2020		C101		Consultation	Tam	0.00
06/03/2020		00203		ВОТОХ	Tam	500.00
06/03/2020 06/03/2020		FILLER TE		FILLER TEARDROP	Tam	499.00
06/03/2020		00203		ВОТОХ	Tam	300.00
06/04/2020		SML		VASER LIPO	Tam	1,000.00
06/04/2020		00203		ВОТОХ	Tam	300.00
06/04/2020		00203 00203		BOTOX	Tam	520.00
06/04/2020		C101		BOTOX	Tam	220.00
06/04/2020		SML		Consultation	Tam	30.00
06/04/2020		D9986		VASER LIPO	Tam	3,700.00
06/04/2020		V102	1	missed appointment Vein- Body Area 1 Sessi	Tam	0.00
06/04/2020		C101	1	Consultation		350.00
06/04/2020		00203		BOTOX	Tam Tam	0.00
06/04/2020		00203		ВОТОХ	Tam	60.00
06/04/2020		B17		2 PRP Package	Tam	170.00
06/04/2020		SUNSCREE		SUNSCREEN	Tam	349.00
06/04/2020		D9986		missed appointment	Tam	40.00 0.00
06/04/2020		VERSA		LIP FILLERS VERSA	Tam	450.00
06/05/2020		00203		BOTOX	Tam	450.00
06/05/2020		777		PRP	Tam	0.00
06/05/2020		SUNSCREE		SUNSCREEN	Tam	40.00
06/05/2020		C101		Consultation	Tam	10.00
06/05/2020		D9986		missed appointment	Tam	0.00
06/05/2020		V102	1	Vein- Body Area 1 Sessi		350.00
06/05/2020		00203		BOTOX	Tam	300.00
06/05/2020		FATTRANS		FAT TRANSFER - BUTT	Tam	5,500.00
06/05/2020		GARMENTS		GARMENTS	Tam	20.00
06/05/2020		C101		Consultation	Tam	0.00
06/05/2020		00203		ВОТОХ	Tam	400.00
06/05/2020		b13		LIP FILLER	Tam	200.00
06/05/2020		F0203		FILLER RADIESSE	Tam	0.00
06/05/2020		B16		1PRP Package	Tam	260.00
06/05/2020		C101		Consultation	Tam	10.00
06/06/2020		VERSA		LIP FILLERS VERSA	Tam	499.00
06/06/2020		C101		Consultation	Tam	0.00
06/06/2020		FATTRANS		FAT TRANSFER - BUTT	Tam	6,000.00
06/06/2020		B16		1PRP Package	Tam	300.00
06/06/2020 06/06/2020		PRP C		PRP CONSULT	Tam	0.00
06/06/2020		C101		Consultation	Tam	0.00
06/08/2020		V		WARTS	Tam	30.00
06/08/2020		C101		Consultation	Tam	0.00
06/08/2020		D9986		missed appointment	Tam	0.00
06/08/2020		SUNSCREE		SUNSCREEN	Tam	40.00
06/08/2020		VERSA		LIP FILLERS VERSA	Tam	400.00
06/08/2020		00203		ВОТОХ	Tam	200.00
06/08/2020		B16 PRP C		1PRP Package	Tam	299.00
06/08/2020		SML		PRP CONSULT	Tam	0.00
06/08/2020		D9986		VASER LIPO	Tam	0.00
06/09/2020		D9986		missed appointment	Tam	0.00
06/09/2020		D9986		missed appointment	Tam	0.00
06/09/2020		B16		missed appointment	Tam	0.00
06/09/2020		00203		1PRP Package BOTOX	Tam	250.00
06/09/2020		ANESTHES		ANESTHESIA	Tam	150.00
06/09/2020		SML	11.63	VASER LIPO	Tam	200.00
06/09/2020		00203		BOTOX	Tam	700.00
06/09/2020		N101		NOSE FILLER	Tam	200.00
06/10/2020		D9986		missed appointment	Tam	550.00
		2,200		пиээси арронитени	Tam	0.00
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Date: 12/1 1/2020						
Date	Patient Name	Code	Tooth	Description	Provider	Fee
06/10/2020		D9986		missed appointment	Tam	0.00
06/10/2020		GARMENTS		GARMENTS	Tam	100.00
06/10/2020		SML		VASER LIPO	Tam	4,000.00
06/10/2020		D9986		missed appointment	Tam	0.00
06/10/2020		FILLERS VE		FILLERS VERSA	Tam	0.00
06/10/2020		00203		BOTOX	Tam	60.00
06/10/2020		00203		BOTOX	Tam	200.00
06/10/2020		N101		NOSE FILLER	Tam	550.00
06/10/2020		SML	Saute	VASER LIPO	Tam	5,800.00
06/11/2020		VASERLIPO		IV THERAPY	Tam	6,020.00
06/11/2020		C101		Consultation	Tam	0.00
06/11/2020		00203		ВОТОХ	Tam	300.00
06/11/2020		B16		1PRP Package	Tam	260.00
06/11/2020		D9986		missed appointment	Tam	0.00
06/11/2020		B16		1PRP Package	Tam	0.00
06/11/2020		V102	1	Vein- Body Area 1 Sessi		300.00
06/11/2020		SML		VASER LIPO	Tam	
06/12/2020		00203		BOTOX	Tam	2,000.00
06/12/2020		00203		BOTOX	Tam	200.00
06/12/2020		B16		1PRP Package	Tam	200.00
06/12/2020		LIPO C		LIPO CONSULT	Tam	300.00
06/12/2020		B16		1PRP Package		0.00
06/12/2020		PRP C		PRP CONSULT	Tam	260.00
06/12/2020		C101		Consultation	Tam	400.00
06/12/2020		VGN		The state of the s	Tam	0.00
06/12/2020		D9986		VAGINAL REJUVENATI	Tam	500.00
06/12/2020		D9986		missed appointment	Tam	0.00
06/12/2020		D9986		missed appointment	Tam	0.00
06/13/2020		VERSA		missed appointment	Tam	0.00
06/13/2020		~		LIP FILLERS VERSA	Tam	400.00
06/13/2020		0201		BOTOX EYES	Tam	72.00
06/13/2020		FILLERS VE		FILLERS VERSA	Tam	1,260.00
06/13/2020		3 PRP Pack		3 PRP	Tam	250.00
06/13/2020		FATTRANS		FAT TRANSFER - BUTT	Tam	0.00
06/13/2020		B16		1PRP Package	Tam	400.00
06/13/2020		GLYTONE		SUNSCREEN LOTION	Tam	40.00
06/13/2020		0000		PREVIOUS BALANCE	Tam	30.00
		SML	VALUE	VASER LIPO	Tam	5,500.00
06/13/2020		B16		1PRP Package	Tam	250.00
06/13/2020		0201		BOTOX EYES	Tam	400.00
06/15/2020		D9986		missed appointment	Tam	0.00
06/15/2020		B16		1PRP Package	Tam	375.00
06/15/2020		00203		BOTOX	Tam	150.00
06/15/2020		FILLERS VE		FILLERS VERSA	Tam	500.00
06/15/2020		B16		1PRP Package	Tam	0.00
06/15/2020		D9986		missed appointment	Tam	0.00
06/15/2020		FATTRANS		FAT TRANSFER - BUTT	Tam	0.00
06/15/2020		N101		NOSE FILLER	Tam	50.00
06/15/2020		D9986		missed appointment	Tam	0.00
06/15/2020		00203		BOTOX	Tam	260.00
06/15/2020		FILLER TE		FILLER TEARDROP	Tam	499.00
06/15/2020		D9986		missed appointment	Tam	0.00
06/15/2020		B16		1PRP Package	Tam	750.00
06/15/2020		PRP C		PRP CONSULT	Tam	0.00
06/16/2020		00203		BOTOX	Tam	
06/16/2020		PRP C		PRP CONSULT	Tam	400.00
06/16/2020		VERSA		LIP FILLERS VERSA	Tam	0.00
06/16/2020		VASERLIPO		IV THERAPY	Tam	500.00
06/16/2020		VERSA		LIP FILLERS VERSA	Tam	0.00
06/16/2020		FATTRANS	A STREET	FAT TRANSFER - BUTT	Tam	499.00
				THE POINT OF THE POINT	I alli	6,300.00

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Date:	12/	14/	202	0
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Date	Patient Name Cod	le Tooth	Description	Provider	Fee
08/03/2020	D9986		missed appointment	Tam	0.00
08/03/2020	COVID	-19 /	COVID-19 / LAB	Tam	40.00
08/03/2020	L011		Surgery-Overhead Cost	Tam	1,000.00
08/03/2020	SML		VASER LIPO	Tam	5,200.00
08/04/2020	Ļ011		Surgery-Overhead Cost	Tam	500.00
08/04/2020	POST I	M 1	POST SURGERY MASSA	Tam	150.00
08/04/2020	SML 1		VASER LIPO-NECK,	Tam	1,500.00
08/04/2020	COVID	-19 /	COVID-19 / LAB	Tam	50.00
08/04/2020	FATTR	ANS	FAT TRANSFER - BUTT	Tam	5,200.00
08/04/2020	L011		Surgery-Overhead Cost	Tam	1,000.00
08/05/2020	L011		Surgery-Overhead Cost	Tam	1,000.00
08/05/2020	MEDIC	INE	MEDICINE	Tam	35.00
08/05/2020	MSJ	1	POST MASSAGE	Tam	150.00
08/05/2020	SML		VASER LIPO	Tam	4,200.00
08/05/2020	COVID	-19 /	COVID-19 / LAB	Tam	0.00
08/14/2020	D9986		missed appointment	Tam	0.00
08/17/2020	SML 1		VASER LIPO-NECK,	Tam	500.00
08/17/2020	D9986		missed appointment	Tam	0.00
08/18/2020	SML		VASER LIPO	Tam	2,200.00
08/18/2020	D9986		missed appointment	Tam	0.00
08/20/2020	D9986		missed appointment	Tam	0.00
08/20/2020	COVID		COVID-19 / LAB	Tam	50.00
08/20/2020	MEDIO	INE	MEDICINE	Tam	35.00
08/20/2020	SML		VASER LIPO	Tam	4,500.00
08/20/2020	F0203		FILLER RADIESSE	Tam	1,900.00
					275,711.00

EXHIBIT 14

EXHIBIT 14

MAR 0 1 2012

VIRLYNN TINNELL IN THE SUPERIOR COURT OF THE STATE OF ARIZONA $_{\mathrm{BY}}$

IN AND FOR THE COUNTY OF MOHAVE

HONORABLE STEVEN F. CONN

DIVISION: 3

DATE: MARCH 1, 2012 TIME: 5:00 P.M. - 5:40 P.M.

VIRLYNN TINNELL, CLERK HEATHER GILLESPIE, DEPUTY CLERK NORMA DELONG, COURT REPORTER

RETURN OF GRAND JURY INDICTMENT

STATE OF ARIZONA. Plaintiff.

VS.

CR-2012-00287

TAMMY LYNN HANKINS, Defendant(s)

RECEIVED

NOV 2 1 2019

APPEARANCES: Victoria Stazio, Deputy County Attorney.

NEVADA STATE BOARD OF MEDICAL EXAMINERS

The Court finds that there are 13 members of the Grand Jury present.

The Court finds that the Indictment contains 5 count(s), and each has been signed a True Bill by Grand Jury Foreman, and has also been signed by the Deputy County Attorney.

IT IS ORDERED directing the Clerk to file the Indictment and Minutes, along with any exhibits, and assign it the above cause number.

IT IS FURTHER ORDERED that a Summons shall issue.

IT IS FURTHER ORDERED setting this matter for Arraignment on Thursday, March 22, 2012 at 8:30 a.m., before the Honorable Derek Carlisle, Judge Pro Tem.

cc:

Mohave County Attorney

Unknown

Attorney for Defendant

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MOHAVE

RECEIVED

STATE OF ARIZONA.

NOV 2 1 2019

Plaintiff,

No. CR-2012- (VOS NEVADA STATE BOARD OF MEDICAL EXAMINERS

VS.

SUMMONS

Tammy Lynn Hankins 3753 Cherry Tree Drive

Lake Havasu City AZ 86406

TAMMY LYNN HANKINS,

Defendant.

A complaint, indictment or information has been filed in this Court against you, TAMMY LYNN HANKINS, charging that in Mohave County, Arizona:

COUNT 1:

FRAUDULENT SCHEMES AND ARTIFICES, CLASS 2 FELONY COUNT 2: OBTAIN OR PROCURE THE ADMINISTRATION OF A NARCOTIC

DRUG BY FRAUD, CLASS 3 FELONY

COUNT 3: OBTAINING A DANGEROUS DRUG BY FRAUD, CLASS 3 FELONY

ATTEMPTED OBTAINING A DANGEROUS DRUG BY FRAUD, CLASS 4 COUNT 4:

ATTEMPTED OBTAINING A DANGEROUS DRUG BY FRAUD, CLASS 4 COUNT 5:

FELONY

YOU ARE HEREBY SUMMONED to appear before this Court at Mohave County Superior Court, British B, at 8:30 (a.m)/p.m., on the 27rd day of March, 20 /2_, Mohave County Courthouse, Kingman, Arizona.

YOU ARE FURTHER ORDERED to appear at the Mohave County Jail, 501 West Highway 66, Kingman, Arizona, on or before the above date, for the purpose of being finger printed and photographed. Prints and photographs are taken on Monday, Wednesday and Friday between 8:00 a.m. and 2:00 p.m. excluding all holidays.

IF YOU FAIL TO APPEAR AS REQUESTED HEREIN, A WARRANT WILL BE ISSUED FOR YOUR ARREST.

Βv

CLERK OF TH

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MOHAVE

CLERK SUPERIOR COURT

STATE OF ARIZONA.

Plaintiff.

DR#: LHCPD 2011-006981

VS.

FELONY INDICTMENT

TAMMY LYNN HANKINS, DOB:

NO.: CR-2012-2X/2-87

JESSICA ROSE CHIESA. DOB:

NO.: CR-2012-

158-GJ-068

DEREK CAPLISLE

Defendants.

The Grand Jurors of Mohave County, Arizona, accuse TAMMY LYNN HANKINS, JESSICA ROSE CHIESA, charging that in Mohave County, Arizona:

COUNT 1: FRAUDULENT SCHEMES AND ARTIFICES, CLASS 2 FELONY

On or about the 1st day of January, 2011 through the 28th day of October, 2011, in the vicinity of, Lake Havasu City, Mohave County, Arizona, said Defendants, TAMMY LYNN HANKINS AND JESSICA ROSE CHIESA, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by obtaining dangerous and narcotic drugs through fraud, all in violation of A.R.S. §§ 13-2310, 13-2301, 13-301, 13-303, 13-701, 13-702, and 13-801, a Class 2 Felony.

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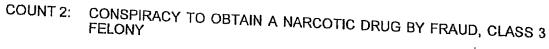
NOV 21 2019

NEVADA STATE BOARD OF MEDICAL EXAMINERS

MATTHEW J. SMITH MOHAVE COUNTY ATTORNEY

DEPUTY COUNTY ATTORNEY

Hankins/



On or about the 1st day of January, 2011, through the 28th day of October, 2011, in the vicinity of, Lake Havasu City, Mohave County, Arizona, said Defendants, TAMMY LYNN HANKINS AND JESSICA ROSE CHIESA, knowingly conspired to obtain a narcotic drug by fraud, deceit, misrepresentation or subterfuge, all in violation of A.R.S. 13-3408(A)(6), 13-3401, 13-1003, 13-301, 13-303, 13-701, 13-702, and 13-801, a Class 3 Felony.

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NOV 2 1 2019

NEVADA STATE BOARD OF MEDICAL EXAMINERS

MATTHEW J. SMITH MOHAVE COUNTY ATTORNEY

FOREMAN WRITES "A TRUE BILL"

BY MEGAN MCCOY
DEPUTY COUNTY ATTORNEY

FOREMAN OF THE GRAND JURY

COUNT 3: CONSPIRACY TO OBTAIN A DANGEROUS DRUG BY FRAUD, CLASS 3 FELONY

On or about the 1st day of January, 2011, through the 28th day of October, 2011, in the vicinity of, Lake Havasu City, Mohave County, Arizona, said Defendants, TAMMY LYNN HANKINS AND JESSICA ROSE CHIESA, knowingly conspired to obtain a dangerous drug by fraud, deceit, misrepresentation or subterfuge, all in violation of A.R.S. §§ 13-3407(A)(6), 13-3401, 13-1003, 13-301, 13-701, 13-702, and 13-801, a Class 3 Felony.

MATTHEW J. SMITH MOHAVE COUNTY ATTORNEY

FOREMAN WRITES "A TRUE BILL"

BY MEGAN MCCOY
DEPUTY COUNTY ATTORNEY

FOREMAN OF THE GRAND ILLEY

Hankins/

COUNT 4: ATTEMPT TO OBTAIN A DANGEROUS DRUG BY FRAUD, CLASS 4

On or about the 27th day of October, 2011, through the 28th day of October, 2011, in the vicinity of, Lake Havasu City, Mohave County, Arizona, said Defendants, TAMMY LYNN HANKINS AND JESSICA ROSE CHIESA, knowingly attempted to obtain a dangerous drug (Valium) by fraud, deceit, misrepresentation or subterfuge, all in violation of A.R.S. §§ 13-3407(A)(6), 13-1001, 13-3401, 13-301, 13-303, 13-30

NOV 2 1 2019

NEVADA STATE BOARD OF MEDICAL EXAMINERS

MATTHEW J. SMITH MOHAVE COUNTY ATTORNEY

FOREMAN WRITES "A TRUE BILL"

BY MEGAN MCCOY
DEPUTY COUNTY ATTORNEY

FOREMAN OF THE GRAND JURY

COUNT 5: ATTEMPT TO OBTAIN A DANGEROUS DRUG BY FRAUD, CLASS 4

On or about the 27th day of October, 2011, through the 28th day of October, 2011, in the vicinity of, Lake Havasu City, Mohave County, Arizona, said Defendants, TAMMY LYNN HANKINS AND JESSICA ROSE CHIESA, knowingly attempted to obtain a dangerous drug (Xanax) by fraud, deceit, misrepresentation or subterfuge, all role, and 13-801, a Class 4 Felony.

MATTHEW J. SMITH MOHAVE COUNTY ATTORNEY

True Bill FOREMAN WRITES "A TRUE BILL"

BY MEGAN MCCOY
DEPUTY COUNTY ATTORNEY

FOREMAN OF THE GRAND JURY

WITNESS: LHCPD

Hankins/

FILED IN THE SUPERIOR COURT OF THE STATE OF A配管NA.

IN AND FOR THE COUNTY OF MOHAVE

MAR - 1 2012

STATE OF ARIZONA.

VIRLYNN TINNELL CLERK SUPERIOR COURT

Plaintiff.

DEPUTY

VS.

DOB:

GRAND JURY MINUTES

TAMMY LYNN HANKINS,

NO.: CR-2012- 00287

JESSICA ROSE CHIESA,

NO.: CR-2012-

DOB:

158-GJ-068

DEREK CARLISLE

Defendants.

At a session of the Grand Jury of the County of Mohave held this 1st day of March, 2012, the above defendants being accused of the crime(s) of COUNT 1: FRAUDULENT SCHEMES AND ARTIFICES, CLASS 2 FELONY; COUNT 2: OBTAIN OR PROCURE THE ADMINISTRATION OF A NARCOTIC DRUG BY FRAUD, CLASS 3 FELONY; COUNT 3: OBTAINING A DANGEROUS DRUG BY FRAUD, CLASS 3 FELONY; COUNTS 4 AND 5: ATTEMPTED OBTAINING A DANGEROUS DRUG BY FRAUD, CLASS 4 FELONIES, committed in Mohave County, Arizona, on or between the 1 day of January, 2011, and the 28th day of October, 2011, based upon the following witness:

NAME:

DATE APPEARED

LHCPD

March 1, 2012

having appeared before the Grand Jury and having given testimony under oath before the Grand Jury; which testimony was reported by the Reporter of the Grand Jury on the days that such testimony was given;

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NEVADA STATE BOARD OF MEDICAL EXAMINERS

Hankins/

the G	rand Jury with 13	_ members present, and only members of the Grand
Јигу р	present, deliberated upon the	e evidence and in 13
vote o	of $\frac{13}{10}$	members present, and only members of the Grand ne evidence and with /3 jurors voting, by a, returned A True Bill
		, returned A True Bill
COUN	NT 1: FRAUDULENT SCHE	EMES AND ARTIFICES, CLASS 2 FELONY
		C C C
		FOREMAN OF THE GRAND JURY
the Gr	and Jury with/3	_ members present, and only members of the Grand
- •	, a - ii - o a cod aboli (ii	e evidence and with 1.3 .
vote of	f13to	O, returned A True Bill
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		R
		FOREMAN OF THE GRAND JURY
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vote of		O, returned A True Bill
COUNT	3: OBTAINING A DANCE	DOUG DELLE
	WINNO A DANGE	ROUS DRUG BY FRAUD, CLASS 3 FELONY
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		jurors voting, by a
COUNT FELONY	4: ATTEMPTED OBTAIN	ING A DANGEROUS DRUG BY FRAUD, CLASS 4
		FOREMAN OF THE GRAND JURY
Hankins/	RECEIVED	OREMAN OF THE GRAND JURY
· · · · · · · · · · · · · · · · · · ·	NOV 2 1 2019	McCoy/12-FD-0100
	NEVADA STATE BOARD OF	
	MEDICAL EXAMINERS	

the Grand Jury with <u>13</u> members present, and only members of the Grand Jury present, deliberated upon the evidence and with <u>13</u> jurors voting, by a vote of <u>13</u> to <u>O</u> , returned A True B: U
COUNT 5: ATTEMPTED OBTAINING A DANGEROUS DRUG BY FRAUD, CLASS 4
FOREMAN OF THE GRAND JURY

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NEVADA STATE BOARD OF MEDICAL EXAMINERS

Hankins/

EXHIBIT 15

EXHIBIT 15

PA PROFILE PAGE



Arizona Regulatory Board of Physician Assistants

Printer Friendly Version

General Information

Tammy Hankins PA
Tammy Hankins PA-C
3753 Cherry Tree Blvd
Lake Havasu City AZ 86406
Phone: (928) 855-9619

License Number: 2228 License Status: Expired Licensed Date: 08/23/1999 License Renewed: 05/29/2012 Due to Renew By: 06/01/2013

If not Renewed, License Expires: 05/20/2014

Education and Training

Training Program:

Graduation Date:

Training Program:

Western Michigan University

Kalamazoo, Michigan

Graduation Date:

12/12/1998

All Physician Assistants (PA) must have a Supervising Physician (SP) to perform healthcare tasks in Arizona. A written delegation agreement must be kept on file in the office of the SP and PA.

Note: Pursuant to A.A.C. R4-17-203.D:

"When the Board (Arizona Regulatory Board of Physician Assistants) issues a regular license to an applicant, the Board is also approving the applicant to issue prescriptions or dispense or issue schedule II or schedule III controlled substances."

The Supervising Physician and the PA are the only ones responsible for ensuring compliance with the terms of

9/9/21, 11:38 AM Profile

the delegation agreement.

Pursuant to A.R.S. 32-2532, a physican assistant may prescribe up to 30 days of Schedule II and II controlled substances. Schedule IV and V controlled substances can be prescribed for 34 days and are refillable up to 5 times in a 6-month period. Non-controlled substances can be refilled up to one year.

Board Action	S	
04/04/2013	Letter of Reprimand W Practice Restriction	

A person may obtain additional public records related to any licensee, including dismissed complaints and non-disciplinary actions and orders, by making a written request to the Board. The Arizona Regulatory Board of Physician Assistants presents this information as a service to the public. The Board relies upon information provided by licensees to be true and correct, as required by statute. It is an act of unprofessional conduct for a licensee to provide erroneous information to the Board. The Board makes no warranty or guarantee concerning the accuracy or reliability of the content of this website or the content of any other website to which it may link. Assessing accuracy and reliability of the information obtained from this website is solely the responsibility of the user. The Board is not liable for errors or for any damages resulting from the use of the information contained herein.

Please note that some Board Actions may not appear until a few weeks after they are taken, due to appeals, effective dates and other administrative processes.

Board actions taken against physician assistants in the past 24 months are also available in a chronological list.

Credentials Verification professionals, please click here for information on use of this website.

1	BEFORE THE ARIZONA REGULATORY BOARD OF PHYSICIAN ASSISTANTS	
2	In the Matter of:	Case No. PA-11-0127A
3	Tammy Hankins, P.A.,	NOTICE OF ERRATA
4	Holder of License No. 2228 for the Performance of Healthcare Tasks	NOTICE OF ENIXIA
5	in the State of Arizona,	
6	Respondent.	
7		
8	The Board submits the following Notice of Errata for the Order for Letter of	
9	Reprimand, Probation and Practice Restriction issued to Respondent Tammy Hankins	
10	in the captioned case: On page 2, line 4, "2001" should be "2011".	
11	DATED AND EFFECTIVE this 33 day of AUGUST, 2013.	
12	DATED AND EFFECTIVE this 3	day of day of, 2013.
13	ADIZONA DECLII ATODY DOADD OF	
14	ARIZONA REGULATORY BOARD OF PHYSICIAN ASSISTANTS	
15		
16	By Lisa S. Wynn	
17	Executive Director	
18	ODICINAL of the foregoing filed	
19	ORIGINAL of the foregoing filed this 23° day of August, 2013 with:	
20	ARIZONA REGULATORY BOARD OF	
22	PHYSICIAN ASSISTANTS 9545 E. Doubletree Ranch Road Scottsdale, AZ 85258	
23		
24	COPY of the foregoing mailed	
25	this <u>ටິວິ</u> day of August, 2013 to:	
26	Tammy Hankins, P.A. Address of Record	
27	Arizona Registancy Board of Physician Assistants Staff	

BEFORE THE ARIZONA REGULATORY BOARD OF PHYSICIAN ASSISTANTS

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In the Matter of

TAMMY HANKINS, P.A.

In the State of Arizona

Holder of License No. 2228

For the Performance of Healthcare Tasks

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Case No. PA-11-0127A

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER FOR LETTER OF REPRIMAND, PROBATION AND PRACTICE RESTRICTION

The Arizona Regulatory Board of Physician Assistants ("Board") considered this Tammy Hankins, P.A. matter at its public meeting on November 28, 2012. ("Respondent") appeared before the Board for a formal interview pursuant to the authority vested in the Board by A.R.S. § 32-2551(G). The Board voted to issue Findings of Fact, Conclusions of Law and Order after due consideration of the facts and law applicable to this matter.

FINDINGS OF FACT

- The Board is the duly constituted authority for the regulation and control of 1. physician assistants in the State of Arizona.
- Respondent is the holder of license number 2228 for the performance of 2. health care tasks in the State of Arizona.
- The Board initiated case number PA-11-0127A after receiving information from a pharmacist alleging that Respondent had been recklessly writing prescriptions without supervision, that she was writing abnormally large quantities of controlled drugs and writing outside her scope of practice.
- Respondent's supervising physician (SP) terminated the supervision relationship with Respondent on September 13, 2011. However, Respondent performed healthcare tasks without an SP's direction from September 13, 2011 through October 25,

2011, according to the date of the last prescribed controlled substance on the Pharmacy Monitoring Profile.

- 5. Although Respondent's SP began threatening to end the supervisory relationship in May 2001, the actual termination did not occur until several months after the correspondence began. There was, therefore, substantial evidence that Respondent did not receive fair notice that her SP had notified the Board that the supervision had ended.
- 6. On October 26, 2011, Respondent wrote two prescriptions for controlled substances on a prescription pad that contained her SP's name and DEA number. The prescriptions were written after the SP terminated his supervisory relationship with Respondent. Board staff determined that the prescription pads did not contain Respondent's current supervisor's information.
- 7. In addition, Respondent failed to timely appear for an investigational interview with Board staff to address the quality of care issues in this case on four occasions. Board staff found that Respondent failed to cooperate with the Board's investigation.
- 8. On November 1, 2011, Respondent was referred to the Board's Physician Health Program (PHP) for an assessment. On November 8, 2011, Respondent entered into an Interim Consent Agreement for Practice Restriction pending her ability to afford and schedule the assessment. On March 2, 2012, the PHP Contractor submitted a report to the Board indicating that Respondent was safe to perform healthcare tasks and no further evaluation, treatment or monitoring recommendations were made. The Interim Practice Restriction was vacated on March 6, 2012.
- 9. A Medical Consultant (MC) reviewed the medical records of patients JC and MW to determine the quality of care provided by Respondent. Patient JC was first seen by Respondent in September of 2009 for weight loss and removal of skin lesions. JC was

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started on Levoxyl and Prozac. JC continued to be seen for chronic pain, and received prescriptions for Phentermine, Vicodin, Valium, Xanax and Oxycodone during the course of treatment with Respondent. Reportedly, JC's prescriptions were stolen in March 2011.

- JC later underwent Fraxel treatment along with Meso therapy that reportedly required continuation of her pain medications. By October 2011, JC had not established herself with a pain specialist and again claimed that her prescriptions were stolen.
- Patient MW only received medical care in the office for a Fraxel treatment on 11. August 23, 2011. There is no record of prescriptions written for this patient in the chart provided.
- A police report made by Respondent's former SP noted that Respondent wrote 39 prescriptions for patient MW between June - September of 2011 including Oxycodone, Hydrocodone, Valium, Phentermine, Xanax, and Endocet. In particular, Respondent wrote a prescription for 100 Oxycodone 5 mg. and 100 Diazepam 10 mg. with five refills on June 20, 2011.
- The record of all pharmacy prescriptions written by Respondent from 13. November 2010 to November 2011 includes 99 pages with 11 prescriptions listed on each page. Approximately 99% of the prescriptions written by Respondent during this time period were for Phentermine, Diazepam, Alprazolam, Hydrocodone, Oxycodone, Endocet and Carisoprodol. Of particular concern to the MC were prescriptions for DJ for 100 Hydrocodone 7.5/740 with five refills and prescriptions for E.K. for 100 Oxycodone 10/325, 90 Alprazolam 1 mg with 2 refills and 40 Meperidine 50 mg. on January 18, 2011.
- The standard of care when prescribing medications for patients requires 14. documentation of the medications prescribed, indications for use and monitoring of the amounts being prescribed and noted in the medical record.

15. Respondent deviated from the standard of care by inappropriately prescribing medications for patients.

16. The excess prescribing of the various medications can lead to addiction or overdose with a possible fatal outcome.

CONCLUSIONS OF LAW

- 1. The Arizona Regulatory Board of Physician Assistants possesses jurisdiction over the subject matter hereof and over Respondent.
- 2. The conduct and circumstances described above constitute unprofessional conduct pursuant to A.R.S. §32-2501(18)(a) Violation of any federal or state law or rule that applies to the performance of health care tasks as a physician assistant. Conviction in any court of competent jurisdiction is conclusive evidence of a violation.
 - A.R.S. §32-2532(B). All prescription orders issued by a physician assistant shall contain the name, address and telephone number of the supervising physician. A physician assistant shall issue prescription orders for controlled substances under the physician assistant's own drug enforcement administration registration number.
- 3. The conduct and circumstances described above constitute unprofessional conduct pursuant A.R.S. §32-2501(18)(i) ("[p]rescribing or dispensing controlled substances or prescription-only drugs for which the physician assistant is not approved or in excess of the amount authorized pursuant to this chapter"); A.R.S. §32-2501(18)(j) ("[a]ny conduct or practice that is or might be harmful or dangerous to the health of a patient or the public"); A.R.S. § 32-2501(18)(p) ("[f]ailing or refusing to maintain adequate records on a patient") and A.R.S. § 32-2501(18)(z) ("[f]ailing to furnish legally requested information to the board or its investigator in a timely manner.").
- 4. The Board finds that a practice restriction is needed in order to protect the public.

<u>ORDER</u>

IT IS HEREBY ORDERED THAT:

- 1. Respondent is issued a Letter of Reprimand.
- 2. Respondent is placed on probation for **one year** with the following terms and conditions:
 - a. Respondent shall within twelve months of the effective date of this Order obtain 15-20 hours of Board Staff pre-approved Category I Continuing Medical Education (CME) in an intensive, in-person prescribing course and obtain 15-20 hours of Board Staff pre-approved Category I CME in an in-person professional boundaries course. Respondent shall provide Board Staff with satisfactory proof of attendance. The CME hours shall be in addition to the hours required for the annual renewal of licensure.
 - b. Respondent is prohibited from prescribing, administering, or dispensing any Controlled Substances until completion of both of the CME courses described in paragraph 2(a) of this Order.
 - c. The probation shall terminate upon completion of the CME courses.
 - d. In the event Respondent should leave Arizona to reside or perform health care tasks outside the State or for any reason should Respondent stop performing health care tasks in Arizona, Respondent shall notify the Executive Director in writing within ten days of departure and return or the dates of non-performance within Arizona. Non-performance is defined as any period of time exceeding thirty days during which Respondent is not engaging in the performance of health care tasks. Periods of temporary or permanent residence or performance of health care tasks outside Arizona or of non-performance of health care tasks within Arizona, will

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ORIGINAL of the foregoing filed

Tammy Hankins, P.A. Address of Record

EXECUTED COPY of the foregoing mailed

RIGHT TO PETITION FOR REHEARING OR REVIEW

Respondent is hereby notified that he has the right to petition for a rehearing or review. The petition for rehearing or review must be filed with the Board's Executive Director within thirty (30) days after service of this Order. A.R.S. § 41-1092.09(B). The petition for rehearing or review must set forth legally sufficient reasons for granting a rehearing or review. A.A.C. R4-16-103. Service of this order is effective five (5) days after date of mailing. A.R.S. § 41-1092.09(C). If a petition for rehearing or review is not filed, the Board's Order becomes effective thirty-five (35) days after it is mailed to Respondent.

Respondent is further notified that the filing of a motion for rehearing or review is required to preserve any rights of appeal to the Superior Court.

DATED AND EFFECTIVE this 28th day of FEBRUARY, 2013

ARIZONA REGULATORY BOARD OF PHYSICIAN ASSISTANTS

By _

Lisa S. Wynn
Executive Director

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Arizona Regulatory Board of Physician Assistants 9545 E. Doubletree Ranch Road Scottsdale, AZ 85258

Arizona Regulatory Board of Physician Assistants Staff

EXHIBIT 16

EXHIBIT 16



IN THE SUPERIOR COURT MOHAVE COUNTY, STATE OF ARIZONA

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NEVADA STATE BOARD OF MEDICAL EXAMINERS

HONORABLE DEREK CARLISLE JUDGE PRO TEMPORE COURTROOM B COURT REPORTER: STEVE GARWOOD

VIRLYNN TINNELL, CLERK OF SUPERIOR COURT BY: JESSICA HIPES, DEPUTY CLERK HEARING DATE: 09/04/2013

STATE OF ARIZONA,

Plaintiff,

CASE NO: CR-2012-00287

VS.

CHANGE OF PLEA HEARING

TAMMY LYNN HANKINS,

START: 09:02 AM

APPEARANCES: Megan McCoy, Deputy County Attorney; Ron Gilleo, Attorney for and with the

Defendant.

This is the time set for a Change of Plea Hearing; the Court has been presented with a Stipulated Guilty Plea.

The Court finds that the Defendant is 42 years of age; has completed the 8 years of college; reads and understands the English language; has not consumed any alcohol, illegal drugs or prescription medications within the past 24 hours; and that the Defendant is agreeing to plead guilty pursuant to Alford to the offense of: Count 3: Conspiracy to Obtain a Dangerous Drug by Fraud, a Class 3 Felony.

The Court advises the Defendant of the possible penalties involved for this offense, and goes over all the terms of the plea agreement. The Court further advises the Defendant of the possible penalties, including if the Defendant is placed on probation, and then violates probation. The Court advises the Defendant of the possible consequences of having a felony conviction; reads the immigration warning, and finds that the Defendant is not presently on probation or parole in any other matter.

The Court finds the Defendant has read the plea agreement, and it has been explained to the Defendant by Defense counsel; the Defendant understands the plea agreement, and it contains everything agreed to between the parties. The Court further confirms the Defendant has signed the plea agreement.

The Court advises the Defendant of her rights, and the rights being given up by entering into this plea agreement, including the right to appeal; and finds that there were no promises made, other than those contained in the plea agreement; that no force was used and no threats were made to get the Defendant to enter into this

The Court reads the charge contained in the Indictment and asks the Defendant for her plea.

The Defendant enters a plea of guilty pursuant to Alford.

The Court advises the Defendant of the elements of this offense and discussion ensues regarding the factual



Based on the record, the Court finds the Defendant has knowingly, intelligently and voluntarily pled guilty pursuant to Alford, to the offense of: Count 3: Conspiracy to Obtain a Dangerous Drug by Fraud, a Class 3 Felony.

The Court further finds that there is a factual basis for the plea; and the plea is accepted and entered of record.

IT IS ORDERED setting this matter for Judgment and Sentencing on Wednesday October 2, 2013 at 2:00 p.m.

IT IS FURTHER ORDERED vacating the Jury Trial set for Monday, September 23, 2013 at 1:30 p.m.

IT IS FURTHER ORDERED directing the Probation Department to prepare a written Pre-Sentence Investigation and Report in this matter.

IT IS FURTHER ORDERED directing the Defendant to report to the Kingman Office of the Probation Department immediately following this hearing.

The Defendant is admonished.

cc:

IT IS ORDERED taking under advisement any motions to dismiss pursuant to the Plea Agreement.

IT IS ORDERED affirming prior release orders.

The Court stands in recess at 9:19 a.m.

MOHAVE COUNTY ATTORNEY *

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MOHAVE COUNTY LEGAL DEFENDER*

NEVADA STATE BOARD OF MEDICAL EXAMINERS

MOHAVE COUNTY PROBATION *

HONORABLE DEREK CARLISLE * Judge Pro Tempore

EXHIBIT 17

EXHIBIT 17

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NOV 2 1 2019 NEVADA STATE BOARD OF

MEDICAL EXAMINERS

IN THE SUPERIOR COURT MOHAVE COUNTY, STATE OF ARIZONABY:

VIRLYNN TINNELL CLERK SUPERIOR CO

Judge: Honorable Derek Carlisle Judge Pro Tempore Courtroom: B Court Reporter: Theresa Salsberry

Virlynn Tinnell, Clerk of Superior Court By: Lacie Robbins, Deputy Clerk Hearing Date: October 2, 2013

STATE OF ARIZONA.

CASE NO: Plaintiff,

CR-2012-00287

vs.

JUDGMENT & SENTENCING PROBATION

START: 2:21 P.M.

TAMMY LYNN HANKINS,

Defendant.

DATE OF BIRTH: DECEMBER 27, 1970

APPEARANCES: The State is represented by Jeff Barlow, Deputy County Attorney; the Defendant is present with counsel, Ron Gilleo.

The Defendant is advised of the charge, the determination of guilt and is given the opportunity to speak. Pursuant to A.R.S. §13-607, the Court finds as follows:

WAIVER OF TRIAL: The Defendant knowingly, intelligently and voluntarily waived her right to a trial; her rights to confront and cross examine witnesses, her right to testify or remain silent and her right to present evidence and call her own witnesses after having been advised of these rights. The determination of guilt was based upon a plea of guilty.

Having found no legal cause to delay rendition of judgment and pronouncement of sentence, the Court enters the following Judgment and Sentence:

IT IS THE JUDGMENT OF THE COURT that the Defendant is guilty of Conspiracy to Obtain a Dangerous Drug by Fraud, a non-dangerous, non-repetitive, Class 3 Felony, in violation of A.R.S. §§ 13-3407A6, 13-3401, 13-1003, 13-301, 13-701, 13-702 and 13-801, committed between January 1, 2011 and October 28, 2011.

Upon consideration of the offense, and the facts, law and circumstances involved in this case, the Court finds that the Defendant is eligible for probation. The specific reasons for the granting of probation are stated by the Court on the record.





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As punishment for this/these crime(s):

NEVADA STATE BOARD OF MEDICAL EXAMINERS

IT IS ORDERED suspending imposition of sentence and placing the Defendant on probation for a period of 4 years commencing October 2, 2013 under the supervision of the Adult Probation Department of this Court, in accordance with the formal Judgment and Order suspending sentence and imposing terms of probation signed by the Court.

As a condition of probation,

IT IS ORDERED that the Defendant pay a monthly probation services fee to the Clerk of the Superior Court of Mohave County at the rate of \$65.00 per month, commencing on November 2, 2013 and due on that day of each month thereafter during the term of probation.

REIMBURSEMENT

IT IS ORDERED that the Defendant shall make and pay reimbursement through the Clerk of the Superior Court of Mohave County for the reasons stated on the record and in the terms and conditions of probation, in the total amount of \$350.00.

FINE

IT IS ORDERED that the Defendant shall pay a fine to the Clerk of the Superior Court of Mohave County in the amount of \$20.00 for a probation assessment.

IT IS ORDERED that the Defendant, pursuant to A.R.S. § 12-116, shall pay to the Clerk of Superior Court of Mohave County a time payment fee in the amount of \$20.00 and an Indigent Assessment Fee in the amount of \$25.00.

IT IS ORDERED that all monies other than the monthly probation services fee shall be paid at the rate of \$10.00 per month, commencing on November 2, 2013 and due on the 2nd day of each month thereafter until paid in full.

The written terms and conditions of probation are handed to the Defendant for explanation, acceptance and signature. The Defendant is advised concerning the consequences of failure to abide by the conditions of probation.

The Defendant is advised concerning rights of appeal/review and written notice of those rights is provided.

Commissioner	<u> </u>
Court	Date
NO.CE-2012	- 00287
STATE VS. To	mmy L
	,
ORDERED ex	conerating any l
ORDERED gragreement; all cha	anting the State
FILED: Conditio	ns of Probation
and copies provid	ed to the Defen

DEREK C. CARLISLE Judge Pro Tempore

bond.

e's Motion to Dismiss any charges/allegations pursuant to the plea

and Notice of Rights of Appeal/Review, both signed by the Defendant

ORDERED allowing Counsel for the Defendant to withdraw as counsel of record.

Let the record reflect that the Defendant's fingerprint is permanently affixed to this sentencing order in open Court.

The Court recesses at 2.30

Honorable Derek C. Carlisle

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NEVADA STATE BOARD OF MEDICAL EXAMINERS

cc:

MOHAVE COUNTY ATTORNEY

MOHAVE COUNTY PROBATION

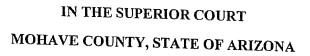
[] MOHAVE COUNTY JAIL

HONORABLE DEREK C. CARLISLE JUDGE PRO TEMPORE

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EXHIBIT 18

EXHIBIT 18



HONORABLE DEREK CARLISLE JUDGE PRO TEMPORE COURTROOM B DIGITALLY RECORDED

VIRLYNN TINNELL, CLERK OF SUPERIOR COURT BY: TONI SEMLER, DEPUTY CLERK **HEARING DATE: 01/17/2014**

STATE OF ARIZONA,

VS.

Plaintiff.

CASE NO: CR-2012-00287 CR-2014-00080

INITIAL APPEARANCE ON A PETITION TO REVOKE/

ARRAIGNMENT

RECEIVED

TAMMY LYNN HANKINS,

START: 01:33 PM

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NEVADA STATE BOARD OF

MEDICAL EXAMINERS APPEARANCES: Matt Williams, Deputy County Attorney; Jon Gillenwater, Attorney for and with the Defendant.

This is the time set for an Initial Appearance on a Petition to Revoke Probation in CR-2012-00287.

Defendant.

The Court advises Counsel that CR-2014-00080 is set for an Arraignment on January 30, 2014; neither Counsel object to taking up the Arraignment today.

As to CR-2012-00287

The Court advises the Defendant that a Petition to Revoke Probation has been filed; finds the Defendant has received a copy; reads the allegations to the Defendant; advises her of her rights in this matter, advises her of the possible penalties involved for the offense, and finds the Defendant is requesting a Court appointed attorney.

Based on the Defendant's statements; the Court finds that the Defendant is provisionally indigent.

IT IS ORDERED provisionally appointing the Legal Defender's Office to represent the Defendant; show the presence of Mr. Gillenwater now representing the Defendant.

Defense counsel enters a denial on behalf of the Defendant.

IT IS ORDERED entering the denial as the plea of record.

IT IS ORDERED setting this matter for a Probation Violation Hearing on Thursday, February 6, 2014

IT IS ORDERED that the Defendant will be held without bond pursuant to Rule 7.2(C).

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As to CR-2014-00080

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IT IS ORDERED vacating the Arraignment set on January 30, 2014 at 8:30 a.m.

NEVADA STATE BOARD OF MEDICAL EXAMINERS

The Court proceeds to the Arraignment at this time.

The Court finds that the Defendant has seen a copy of the Indictment, and that her true name is set forth thereon.

Counsel for the Defendant waives the reading of the Indictment, and enters a plea of not guilty on behalf of the Defendant.

IT IS ORDERED entering the Defendant's not guilty plea of record.

IT IS ORDERED setting this matter for a Case Management Conference on Thursday, February 6, 2014 at 11:30 a.m.

The Court admonishes the Defendant and advises her of the disclosure process and advises her that her failure to appear at any further hearing will result in the issuance of a bench warrant.

Discussion ensues as to other cases that are pending, discovery and possible enhancement motions. The Court reads the charges, and advises the Defendant of the possible range of penalties involved. Discussion ensues as to any pending plea offer, and victim's rights, if applicable.

The Court finds that the Defendant's correct mailing address is: 3753 Cherry Tree Boulevard, Lake Havasu City, AZ 86406.

Discussion ensues regarding release conditions.

IT IS ORDERED that the Defendant will be held without bond pursuant to Rule 7.2(C).

The Court will set release conditions in this case if the Probation case is resolved.

The Court recesses at 1:47 p.m.

cc:

MOHAVE COUNTY ATTORNEY*

MOHAVE COUNTY LEGAL DEFENDER *

MOHAVE COUNTY JAIL *

MOHAVE COUNTY PROBATION *

HONORABLE DEREK CARLISLE*

Judge Pro Tempore

EXHIBIT 19

EXHIBIT 19

AUG 11 2014

IN THE SUPERIOR COURT MOHAVE COUNTY, STATE OF ARIZONA

VIRLYNN TINNELL CLERK SUPERIOR COURT DEPI!

HONORABLE DEREK CARLISLE JUDGE PRO TEMPORE COURTROOM: B COURT REPORTER: KIM FAEHN

VIRLYNN TINNELL, CLERK OF SUPERIOR COURT BY: JESSICA HIPES, DEPUTY CLERK HEARING DATE: 08/11/2014

STATE OF ARIZONA,

CASE NO:

CR-2012-00287

CR-2014-00080

VS.

Plaintiff.

DISPOSITION/JUDGMENT & SENTENCING -

PRISON

TAMMY LYNN HANKINS,

START: 8:35 AM

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Defendant.

NEVADA STATE BOARD OF MEDICAL EXAMINERS

DATE OF BIRTH: December 27, 1970

The State is represented by Kim Aune, Deputy County Attorney; the Defendant is present with counsel, Brad Rideout.

This is the time set for a Disposition Hearing in CR-2012-00287 and Judgment and Sentencing in CR-2014-00080.

Defense counsel provides a letter to the Court, which the Court reviews.

The Defendant is advised of the charge, the determination of guilt and is given the opportunity to speak.

Pursuant to A.R.S. §13-607, the Court finds as follows:

WAIVER OF TRIAL: The Defendant knowingly, intelligently and voluntarily waived her right to a trial to the Court; her rights to confront and cross examine witnesses, her right to testify or remain silent and her right to present evidence and call her own witnesses after having been advised of these rights. The determination of guilt was based upon an admission of probation violation and upon a plea of guilty.

Having found no legal cause to delay rendition of judgment and pronouncement of sentence, the Court enters the following Judgment and Sentence.

As to CR-2012-00287:

IT IS THE JUDGMENT OF THE COURT that the Defendant is guilty of violating her probation for the following crime(s), that upon due consideration of all the facts, law and circumstances relevant here, the Court



finds that suspension of sentence and a term of probation are not appropriate and that a sentence of imprisonment with the Arizona Department of Corrections is appropriate.

THE COURT FURTHER FINDS that there are circumstances sufficiently substantial to call for a Presumptive or Aggravated or Mitigated term as indicated. These circumstances are stated by the Court on the record.

AS PUNISHMENT, IT IS ORDERED revoking the Defendant's probation; that the Defendant is sentenced to a term of imprisonment and is committed to the Arizona Department of Corrections as follows:

OFFENSE: Count 3: Conspiracy to Obtain a Dangerous Drug by Fraud

FELONY CLASS: 3

IN VIOLATION OF A.R.S. §§: 13-1003, 13-3407(A)(6), 13-3401, 13-301, 13-701, 13-702 and 13-801

DATE OF OFFENSE: on or between January 1, 2011 and October 28, 2011

RECEIVED

SENTENCE: 2 ½ years with the Arizona Department of Corrections.

NOV 2 1 2019

This is a minimum sentence. This offense is non-dangerous and non-repetitive.

NEVADA STATE BOARD OF MEDICAL EXAMINERS

This sentence is to date from August 11, 2014. The Defendant is to be given credit for 208 days served prior to sentencing.

IT IS ORDERED affirming all financial sanctions that have accrued as of today's date.

IT IS ORDERED vacating all other terms of probation previously ordered.

IT IS ORDERED sentencing the Defendant to a term of community supervision, under the Community Supervision Program, for a period of one day for every seven days of the sentence imposed, which is to be served consecutive to the actual term of imprisonment.

As to CR-2014-00080:

IT IS THE JUDGMENT OF THE COURT that the Defendant is guilty of the following crime(s), that upon due consideration of all the facts, law and circumstances relevant here, the Court finds that suspension of sentence and a term of probation are not appropriate and that a sentence of imprisonment with the Arizona Department of Corrections is appropriate.

THE COURT FURTHER FINDS that there are circumstances sufficiently substantial to call for a Presumptive or Aggravated or Mitigated term as indicated. These circumstances are stated by the Court on the record.

AS PUNISHMENT, IT IS ORDERED that the defendant is sentenced to a term of imprisonment and is committed to the Arizona Department of Corrections as follows:

OFFENSE: Count 4: Sexual Conduct with a Minor

ELONY CLASS: 6

I VIOLATION OF A.R.S. §§: 13-1405, 13-1401, 13-701, 13-702 and 13-801

NOV 2 1 2019

RECEIVED

ATE OF OFFENSE: on or about October 31, 2013

NEVADA STATE BOARD OF MEDICAL EXAMINERS

ENTENCE: 1 year with the Arizona Department of Corrections.

is is a presumptive sentence. This offense is non-dangerous and non-repetitive.

nis sentence is to begin upon the completion of and run consecutive to the sentence imposed in CR-2012-1287. The Defendant is to be given credit for 0 days served prior to sentencing.

- ' IS ORDERED sentencing the Defendant to a term of community supervision, under the Community ipervision Program, for a period of one day for every seven days of the sentence imposed, which is to be rved consecutive to the actual term of imprisonment.
- ' IS ORDERED that the Defendant pay any unpaid fines, fees, surcharges or assessments to the Clerk of perior Court within 6 months following the Defendant's release from the Department of Corrections.
- ' IS ORDERED directing the Probation Department to detach the Psychological Report from the Presentence port and place in the confidential portion of the Court file.

ATER...

- ' IS ORDERED vacating the prior Order directing the Probation Department, to detach the Psychological sport from the Presentence report.
- ' IS FURTHER ORDERED directing the Clerk to seal the entire Probation Violation Report; which includes e Defendant's letter; and place that report in the confidential portion of the Court file.

EXHIBIT 20

EXHIBIT 20

NEVADA STATE BOARD OF MEDICAL EXAMINERS

9600 Gateway Drive Reno, NV 89521

Rachakonda D. Prabhu, M.D. Board President Edward O. Cousineau, J.D. Executive Director



* * * M I N U T E S * * *

OPEN SESSION BOARD MEETING

Held in the Conference Room at the Offices of the Nevada State Board of Medical Examiners 9600 Gateway Drive, Reno, Nevada 89521

and Videoconferenced to

the Conference Room at the Offices of the Nevada State Board of Medical Examiners/Nevada State Board of Dental Examiners 6010 S. Rainbow Boulevard, Building A, Suite 1, Las Vegas, Nevada 89118

FRIDAY, MARCH 6, 2020 - 8:00 a.m.

Board Members Present

Rachakonda D. Prabhu, M.D., President Mr. M. Neil Duxbury, Vice President Ms. April Mastroluca, Secretary-Treasurer Victor M. Muro, M.D. Aury Nagy, M.D. Weldon Havins, M.D., J.D. Ms. Maggie Arias-Petrel Bret W. Frey, M.D.

Board Members Absent
Michael C. Edwards, M.D., FACS

Staff/Others Present

Edward O. Cousineau, J.D., Executive Director
Sarah A. Bradley, J.D., MBA, Deputy Executive Director
Donya Jenkins, Finance Manager
Robert Kilroy, J.D., General Counsel
Aaron Bart Fricke, J.D., Senior Deputy General Counsel
Donald K. White, J.D., Deputy General Counsel
Laurie L. Munson, Chief of Administration and Information Systems
Lynnette L. Daniels, Chief of Licensing
Henna Rasul, J.D., Senior Deputy Attorney General

Agenda Item 1

CALL TO ORDER AND ANNOUNCEMENTS

Roll Call/Quorum

The meeting was called to order by President Rachakonda D. Prabhu, M.D., at 8:01 a.m.

Mr. Cousineau took roll call, and all Board members were present with the exception of Dr. Edwards and Ms. Arias-Petrel. Mr. Cousineau announced there was a quorum.

Agenda Item 2

PUBLIC COMMENT

Dr. Prabhu asked whether there was anyone in attendance who would like to present public comment. No public comment was received.

Agenda Item 3

APPROVAL OF MINUTES

- (a) December 6, 2019 Board Meeting Open Session
- (b) December 18, 2019 Board Meeting Open Session

Ms. Mastroluca moved that the Board approve the Minutes of the December 6, 2019 Board Meeting – Open Session and December 18, 2019 Board Meeting – Open Session. Dr. Muro seconded the motion, and it passed unanimously.

Agenda Item 4

CONSIDERATION OF REQUEST OF VICTOR R. BRUCE, M.D. FOR REMOVAL OF CONDITION ON HIS MEDICAL LICENSE

Dr. Bruce appeared in Las Vegas. Bernard Addo-Quaye, M.D., Dr. Bruce's preceptor, was present with Dr. Bruce.

Dr. Bruce stated he was requesting that the Board lift the preceptorship condition from his medical license. The Board had required him to participate in a 12-month preceptorship, which he began on October 24, 2018, and completed on December 13, 2019, and he had essentially completed all the conditions that had been placed upon him.

Dr. Muro asked about the other preceptorship requirements.

Dr. Bruce said he was to see 15 patients a day, for 12 months, supervised by Dr. Addo-Quaye. He then described the details of his work with Dr. Addo-Quaye. He explained that in order to meet the required patient volume, he worked in two clinics, and did the best he could to have as many patient encounters as possible.

Mr. Cousineau said Board staff had a concern that Dr. Bruce had unilaterally deviated from the preceptorship plan as approved by the Board.

Ms. Daniels explained that Dr. Addo-Quaye's final report indicated that in January 2019, they began participating in care at the Brightstar Urgent & Primary Care location, which was not part of the original preceptorship plan. The original plan was for the Trucare Medical Center location, and Ms. Daniels was never aware there had been a change in location until she received the final report, which is something the Board has not seen before.

Ms. Arias-Petrel joined the meeting at 8:12 a.m.

Dr. Havins asked Dr. Addo-Quaye whether he had supervised Dr. Bruce at the Brightstar location.

Dr. Addo-Quaye said that he did. He said there were no specific restrictions on his preceptorship of Dr. Bruce with respect to location, and when the Brightstar location came into play, he thought they had sent appropriate notification to the Board regarding that.

Dr. Bruce said the approval letter from the Board did not specify a location.

Dr. Havins asked Dr. Addo-Quaye whether his supervision of Dr. Bruce was any different at Trucare than it was at Brightstar, and Dr. Addo-Quaye stated it was not.

Ms. Daniels said that no notification had been received from either Dr. Bruce or Dr. Addo-Quaye that there had been a change in preceptorship location, and the original preceptorship plan speaks only to Trucare Medical Center.

Mr. Cousineau said the question for the Board was whether it wanted to acknowledge that the preceptorship plan, as modified unilaterally, was acceptable, or whether it wanted to consider some kind of alternative.

Dr. Muro said the preceptorship, by definition, required direct observation and mentoring, not just being on the premises where a certain number of patients were seen, so unless he heard otherwise, he thought the preceptorship was also wanting in that area.

Dr. Nagy said he shared Dr. Muro's concern. Additionally, he had an issue with respect to the numbers. Dr. Bruce was to see 15 to 20 patients a day, and he did not fulfill that requirement. The largest number of patients he saw over the course of a month was about 10 patients a day in October of 2019.

Dr. Muro said the Board was addressing two things: whether the preceptorship was modified unilaterally, which appeared to be the case, and whether there was an adequate number of patients seen under direct supervision to satisfy the Board's concerns.

Dr. Bruce said there was a lot of hands-on preceptorship, and the largest number of patients he saw was at Trucare, but he had no control over the number of patients who came into Dr. Addo-Quaye's clinics.

Dr. Nagy moved that Dr. Bruce continue in the preceptorship for six months under the terms of the preceptorship.

Discussion ensued regarding the duration of the continued preceptorship and the number of patients that Dr. Bruce should be required to see during that time.

Dr. Nagy amended his motion to state that Dr. Bruce see 600 patients and come back before the Board when he has completed that. Dr. Frey seconded the motion.

Ms. Mastroluca asked that Dr. Bruce and Dr. Addo-Quaye notify Board staff if they change locations for any reason.

A vote was taken on the motion, and it passed unanimously.

Agenda Item 5

ADJUDICATION IN THE MATTER OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS VS. CYNTHIA V. IVEY, CRT, BME CASE NO. 19-30399-1

Ms. Ivey was not present.

Dr. Prabhu named the adjudicating Board members who would be considering the matter.

Ms. Rasul asked whether the adjudicating Board members had received and reviewed the materials related to this matter, and they indicated that they had.

Ms. Rasul then provided procedural instruction regarding the adjudication process.

Dr. Havins asked whether Ms. Ivey had been served with notice of the hearing. Mr. White stated that Board staff had attempted to serve Ms. Ivey both personally and through certified mail.

Dr. Nagy stated the first count against Ms. Ivey was failure to maintain timely, legible, accurate and complete medical records. In her response, she admitted she did not timely place the note and then called her colleague and asked her to do it, so he thinks there is no question the accusation is correct that she did not maintain timely, legible, accurate and complete medical records. Count II alleged misrepresentation in obtaining or renewing a license. Ms. Ivey failed to report a hospital investigation on her renewal application. She said she was unaware there was an official proceeding, but, nonetheless, there was an investigation that she failed to report.

Ms. Mastroluca moved that the Board adopt the Hearing Officer's Synopsis and Recommendations. Dr. Nagy seconded the motion, and it passed, with all adjudicating Board members voting in favor of the motion.

Mr. White stated the Investigative Committee's recommendations regarding discipline in this matter were as follows: that Ms. Ivey's license to practice as a respiratory therapist be revoked, and she may not apply for reinstatement of her license for a period of two years, pursuant to NRS 630.352 and NRS 622A.410, and that she receive a public letter of reprimand.

Discussion ensued regarding the Investigative Committee's proposed discipline.

Mr. White outlined the Investigative Committee's Memorandum of Costs and Fees submitted in the matter, and stated the total was \$8,285.02. The payment would be immediately stayed, but immediately due in full in the event Ms. Ivey reapplies for a license.

Ms. Mastroluca moved that the Board accept the Investigative Committee's disciplinary recommendations. Mr. Duxbury seconded the motion.

Mr. Cousineau stated for the record that the motion was as follows: revocation of license, and Ms. Ivey may not reapply for a license for two years, public reprimand, and costs as outlined in the Memorandum of Costs and Fees.

A vote was taken on the motion, and it passed, with all adjudicating Board members voting in favor of the motion.

Agenda Item 6

CONSIDERATION OF REVOCABLE DELEGATION AND AUTHORIZATION BY THE BOARD TO THE GENERAL COUNSEL OF THE BOARD TO DEFEND THE BOARD'S FINDINGS, CONCLUSIONS, ORDERS AND ACTIONS IN THE MATTER OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS VS. CYNTHIA V. IVEY, CRT, BME CASE NO. 19-30399-1, IN ANY CIVIL OR CRIMINAL PROCEEDING, STATE OR FEDERAL, THAT IMPLICATES THE BOARD'S ADJUDICATION OF THIS CASE, TO PARTICIPATE IN, DEFEND AGAINST, OR TO INITIATE ON ITS BEHALF ANY PETITION FOR JUDICIAL REVIEW OR APPEAL THEREFROM, TO FILE A NOTICE OF APPEAL OR STATEMENT OF INTENT TO PARTICIPATE ON ITS BEHALF, TO NEGOTIATE AND SETTLE CLAIMS ON ITS BEHALF, AND TO TAKE COMPARABLE ACTIONS AND MAKE COMPARABLE DECISIONS ON ITS BEHALF

Mr. White stated that staff was seeking the Board's authorization to defend the Board or take any other actions on its behalf with respect to this matter.

Dr. Havins moved that the Board authorize the General Counsel to defend the Board's findings, conclusions, orders and actions in this matter. Ms. Mastroluca seconded the motion, and it passed unanimously.

Agenda Item 7

CONSIDERATION OF RESPONDENT DHAVAL JASVANTBHAI SHAH, M.D.'S MOTION FOR CONSOLIDATION OF CASES UNDER NRS 622A.300, IN THE MATTER OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS VS. DHAVAL JASVANTBHAI SHAH, M.D., BME CASE NO. 19-32539-01, AND RESPONDENT ASHER SHAHZAD, M.D.'S MOTION FOR CONSOLIDATION OF CASES UNDER NRS 622A.300, IN THE MATTER OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS VS. ASHER SHAHZAD, M.D., BME CASE NO. 19-38390-01

Mr. Fricke advised the Board that Notices of Withdrawal of these motions had been received from opposing counsel the previous day, that counsel for the Investigative Committee was stipulating to withdrawal of the motions on the record, and therefore the matter should not be considered further.

Agenda Item 8

REQUEST FOR ORDER CLARIFYING AND AMENDING TERMS OF PREVIOUSLY-APPROVED SETTLEMENT AGREEMENT IN THE MATTER OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS VS. STEPHEN WINSLOW GORDON, M.D., BME CASE NO. 19-11531-1

This matter was not discussed at the meeting.

Agenda Item 9 REPORTS

(a) Investigative Committees

Mr. Duxbury reported that at its February 21, 2020 meeting, Investigative Committee A considered 117 cases. Of those, the Committee authorized the filing of a formal complaint in 8 cases, sent 13 cases out for peer review, requested an appearance in 9 cases, issued 13 letters of concern, referred 5 cases back to investigative staff for further investigation or follow-up, and recommended closure of a total of 69 cases.

Dr. Prabhu reported that at its February 12, 2020 meeting, Investigative Committee B considered 137 cases. Of those, the Committee authorized the filing of a formal complaint in 8 cases, sent 13 cases out for peer review, requested an appearance in 12 cases, issued 29 letters of concern, referred 3 cases back to investigative staff for further investigation or follow-up, and recommended closure of a total of 72 cases. He then thanked the other two members of Investigative Committee B and the staff for their very hard work.

(b) Nevada State Medical Association

Jaron Hildebrand, Executive Director of the Nevada State Medical Association (NSMA) said his first day on his own with NSMA was January I, and provided some information regarding his background. He said he had been trying to get up to date on health care policy, and was currently working on the out-of-network regulations. The second round of drafts were currently with the Legislative Counsel Bureau and another workshop would be scheduled once NSMA received them back. He was late to the meeting that day because he was on a call with the Washoe County Health District due to a confirmed case of Coronavirus in Washoe County. He said there were currently 300 test kits at the Washoe County Health District, and they were asking people not to just go to the emergency room, and to either just stay home and quarantine themselves for two weeks or call ahead before going to the emergency room. He said he believed Clark County had around 600 test kits, and the state was supposed to receive thousands by the following week. He has also been working on the Cancer Registry. They are rewriting the draft regulations, so it is still evolving.

(c) Clark County Medical Society

No report was presented at this meeting.

(d) Washoe County Medical Society

Mary Ann McCauley, Executive Director of the Washoe County Medical Society (WCMS), reported that WCMS started off the year on a really positive note, primarily due to the interest it has seen in participation on the Board of Directors. There were five candidates for one position on the Board of Directors. Fortunately, NSMA is not restricted with regard to the number of Directors

it may have on the Board, so it added one additional position, and two of the three remaining candidates had joined committees. She said WCMS had a great inaugural dinner, with a Hawaiian theme. WCMS is working on two back-to-back CMEs, which will be held in probably late September. The first will be about working with disruptive patients, followed by how to appropriately fire a patient. WCMS will host an event at The Eddy in June and a family BBQ at Bartley Ranch on August 20. It is also moving forward with member recruitment, and is getting ready to pitch to non-members in a couple of different ways.

Agenda Item 10

CONSIDERATION OF SETTLEMENT AGREEMENT IN THE MATTER OF *THE NEVADA*STATE BOARD OF MEDICAL EXAMINERS VS. SETH H. WITTNER, PA, BME CASE NO. 19-30184-1

Dr. Prabhu named the adjudicating Board members who would be considering the matter.

Mr. White stated a formal Complaint had been filed against Mr. Wittner alleging two violations of the Nevada Medical Practice Act, and outlined the terms of the proposed Settlement Agreement.

Dr. Havins moved that the Board approve the proposed Settlement Agreement. Dr. Muro seconded the motion, and it passed, with all adjudicating Board members voting in favor of the motion.

Agenda Item 11

CONSIDERATION OF SETTLEMENT AGREEMENT IN THE MATTER OF *THE NEVADA*STATE BOARD OF MEDICAL EXAMINERS VS. JON L. SIEMS, M.D., BME CASE NO. 19-13009-1

Dr. Prabhu named the adjudicating Board members who would be considering the matter.

Mr. White stated a formal Complaint had been filed against Dr. Siems alleging four violations of the Nevada Medical Practice Act, and outlined the terms of the proposed Settlement Agreement.

Dr. Frey moved that the Board adopt the Settlement Agreement. Dr. Muro seconded the motion, and it passed, with all adjudicating Board members voting in favor of the motion.

Agenda Item 12

CONSIDERATION OF SETTLEMENT AGREEMENT IN THE MATTER OF *THE NEVADA*STATE BOARD OF MEDICAL EXAMINERS VS. CARLOS ENRIQUE FONTE, M.D., BME CASE NO. 18-9800-01

Dr. Fonte's legal counsel, David J. Mortensen, Esq., was present in Reno.

Dr. Prabhu named the adjudicating Board members who would be considering the matter.

Mr. White stated a First Amended Complaint had been filed against Dr. Fonte alleging one violation of the Nevada Medical Practice Act, and outlined the terms of the proposed Settlement Agreement. He explained that he, Dr. Fonte and Mr. Mortensen had all stipulated to change the Continuing Medical Education in the Settlement Agreement from 10 hours related to the subject of

geriatric medicine to 6 hours related to the subject of record keeping and the remaining 4 hours related to the subject of geriatric medicine, for a total of 10 hours.

Mr. Mortensen stated he and Dr. Fonte were agreeable to that.

Ms. Mastroluca moved that the Board approve the proposed Settlement Agreement. Dr. Frey seconded the motion, and it passed, with all adjudicating Board members voting in favor of the motion.

Agenda Item 13

CONSIDERATION OF SETTLEMENT AGREEMENT IN THE MATTER OF *THE NEVADA*STATE BOARD OF MEDICAL EXAMINERS VS. ROSNER PATRICK LUSS, M.D., BME
CASE NO. 19-10860-1

Dr. Prabhu named the adjudicating Board members who would be considering the matter.

Mr. Kilroy stated a First Amended Complaint had been filed against Dr. Luss alleging three violations of the Nevada Medical Practice Act, and outlined the terms of the proposed Settlement Agreement.

Dr. Havins moved that the Board approve the Settlement Agreement. Dr. Muro seconded the motion, and it passed, with all adjudicating Board members voting in favor of the motion.

Agenda Item 14

CONSIDERATION OF SETTLEMENT AGREEMENT IN THE MATTER OF *THE NEVADA STATE BOARD OF MEDICAL EXAMINERS VS. RAFAEL MIRCHOU, M.D.*, BME CASE NO. 19-10416-1

Dr. Prabhu named the adjudicating Board members who would be considering the matter.

Mr. Kilroy stated a formal Complaint had been filed against Dr. Mirchou alleging two violations of the Nevada Medical Practice Act, and outlined the terms of the proposed Settlement Agreement.

Dr. Havins moved that the Board accept the Settlement Agreement. Dr. Frey seconded the motion, and it passed, with all adjudicating Board members voting in favor of the motion.

Agenda Item 15

CONSIDERATION OF SETTLEMENT AGREEMENT IN THE MATTER OF *THE NEVADA*STATE BOARD OF MEDICAL EXAMINERS VS. HUY NGUYEN, M.D., BME CASE
NO. 19-30254-1

This matter was not discussed at the meeting.

Agenda Item 16

CONSIDERATION OF AMENDED SETTLEMENT AGREEMENT IN THE MATTER OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS VS. MATTHEW OBIM OKEKE, M.D., BME CASE NO. 19-22461-1

Dr. Prabhu named the adjudicating Board members who would be considering the matter.

Ms. Bradley explained the purpose of the Amended Settlement Agreement was just to make a clarification with regard to the payment of the costs, as it wasn't clear where the costs were coming from. The amendment clarifies it for accounting purposes, so we have a clear record and can apply the payments appropriately.

Dr. Havins moved that the Board approve the Amended Settlement Agreement. Dr. Muro seconded the motion, and it passed, with all adjudicating Board members voting in favor of the motion.

Agenda Item 17 EXECUTIVE STAFF/STAFF REPORTS

(a) Investigations Division Report

Ms. Bradley reported the current number of open investigative cases was 1,012 and the current average number of cases per investigator was 112. There were 57 peer reviews in the field and 43 peer reviews awaiting assignment, for a total of 100.

Mr. Duxbury asked how much time the average peer review takes. Ms. Bradley said that staff requests they be returned within 60 days, and follows up when they are late. In 2019, the average number of days for a complaint was 162, but not all of those involved a peer review.

Ms. Mastroluca thanked Ms. Bradley for stepping up and taking on this role in the Investigations Division in the absence of a Division Chief.

Mr. Cousineau advised the Board that staff would be interviewing the final candidates for the Chief of Investigations position the following week, and he anticipated filling the position by the end of that week.

(b) Quarterly Compliance Report

Ms. Jenkins reported the total number of files in collection with the State Controller's Office for the fourth quarter of 2019 was 8, for a total of \$45,951.66. There were 2 collections written off during the quarter in the amount of \$6,864.94. The total outstanding in costs was \$96,129.95, the total outstanding in fines was \$17,000.00, and the total costs collected during the quarter were \$23,743.59.

(c) Quarterly Update on Finances

Ms. Jenkins advised the Board that a Request for Proposals had been made for the Board's financial audits, and the contract had been awarded to the accounting firm of Casey Neilon. The contract was going through the State's contracting process and was waiting to go before the Board of Examiners for approval. She said she had reviewed all the calculations with respect to the status of the Board's reserves, and it is Board policy that she report that on a quarterly basis. As of December 31, 2019, the Board was at 4.3 months of reserves.

Ms. Jenkins then highlighted the various sections of the Balance Sheet for the fourth quarter of 2019. Current assets were \$6,686,000, fixed assets were \$3,543,000, for total assets of \$11,509,000. Current liabilities were \$6,132,000, long-term liabilities were \$7,091,000, which are primarily the post-retirement benefits, and net position was a negative \$1,714,000. The net income

for the year, as it stands now, was \$340,000. She said we expect that figure to change after the July report that gives us the figures for the post-retirement benefit values.

Ms. Jenkins then highlighted the various sections of the Profit and Loss Budget vs. Actual for the fourth quarter of 2019. Total income was at 91.9% of budget, total personnel expenses were at 89.3% of budget, total expenses were at 96.9% of budget, and a difference of \$49,747.00.

Mr. Cousineau stated that Ms. Mastroluca had assisted with the selection of the new financial audit firm, and based on the cost, as well as their recommendations, he anticipates this will be a good replacement for the previous firm. Ms. Mastroluca added it was nice to find a local company that has experience in performing Board audits.

Dr. Havins asked whether the amount of net pension liability covered all the pension liability or whether it was a percentage of what is in PERS.

Ms. Jenkins stated it was based on a very complicated formula. She explained the State produces its actuarial reports, and this figure is based on where they were in July of last year, which reports a previous period from that, and the auditors use that to determine the value of the Board's portion of the post-retirement benefits liability.

(d) Legal Division Report

Mr. Kilroy reported there were currently 168 cases in the Legal Division, 6 of which had been presented to the Board for action at this meeting. In the last quarter, 2 cases were closed and/or dismissed by the Investigative Committees upon a subsequent review of the matter. There were 144 cases authorized for filing of a formal complaint and 47 letters of concern were approved by the Investigative Committees during their February meetings. Mr. Kilroy then provided an update regarding the single pending civil court case in which the Board was currently involved.

Agenda Item 18

LICENSURE RATIFICATION

 Ratification of Licenses Issued, Reinstatements of Licensure and Changes of Licensure Status Approved Since the December 6, 2019 Board Meeting

Dr. Nagy moved that the Board ratify the licenses issued, reinstatements of licensure and changes of licensure status approved since the December 6, 2019 Board Meeting. Dr. Havins seconded the motion.

Ms. Daniels thanked the Licensing team for all of their continued hard work and the awesome job that they do.

A vote was taken on the motion, and it passed unanimously.

Agenda Item 19

APPEARANCES FOR CONSIDERATION OF ACCEPTANCE OF APPLICATIONS FOR LICENSURE

(a) Dwight Cooper Reynolds, M.D.

Dr. Prabhu asked Dr. Reynolds whether he wanted his application to be considered in closed session, with the public being excluded, and he said that he did not.

- Dr. Reynolds thanked the Board for giving him an opportunity to appear. He said he took responsibility for the inadvertent errors made on his application for licensure, but at no time did he intentionally falsify or try to mislead anyone with his application.
- Dr. Muro questioned Dr. Reynolds regarding why he left the general surgery training program at the Cleveland Clinic. He said he had answered negatively to Question 8 on his application for licensure because he didn't see the word "resigned" in the question.
- Dr. Muro stated that Dr. Reynolds would need to maintain his ABMS certification in Emergency Medicine, as it is a requirement.
- Dr. Havins asked Dr. Reynolds whether he planned to perform liposuction procedures. Dr. Reynolds said he wasn't sure, but right now he was focusing on Emergency Medicine.
- Dr. Havins asked Dr. Reynolds why he wanted to come to Nevada. Dr. Reynolds said he likes Reno.
- Dr. Frey asked Dr. Reynolds whether he was currently performing any aesthetic medicine procedures in any of the states he was currently licensed in, and Dr. Reynolds said that he was.
- Dr. Muro moved that the Board grant Dr. Reynolds a license with the condition that he maintain his ABMS certification in Emergency Medicine. Mr. Duxbury seconded the motion, and it passed unanimously.

(b) Mateusz Andrzej Lapucha, M.D.

- Dr. Lapucha appeared in Las Vegas. Alia A. Najjar, M.D., Esq., appeared with Dr. Lapucha as his legal counsel.
- Dr. Prabhu asked Dr. Lapucha whether he wanted his application to be considered in closed session, with the public being excluded, and he said that he did.
- Dr. Havins moved that the Board go into closed session pursuant to NRS 241.030. Ms. Mastroluca seconded the motion, and it passed unanimously.

Upon returning to open session, Dr. Nagy moved that the Board grant Dr. Lapucha's application for licensure. Mr. Duxbury seconded the motion, and it passed unanimously.

(c) Peter Harker Philander, M.D.

- Dr. Prabhu asked Dr. Philander whether he wanted his application to be considered in closed session, with the public being excluded, and he said that he did not.
- Ms. Mastroluca asked Dr. Philander to describe what he had been doing for the last few years since he stopped practicing clinical medicine, and Dr. Philander explained that he had been involved in clinical research activities.
- Ms. Mastroluca asked Dr. Philander why he wanted to reactivate his license, and he explained that he needed an active license because a company he wants to work for would require him to have one.

Dr. Muro asked when he last examined a patient, prescribed, and/or came up with an active treatment plan, and Dr. Reynolds said it was in 2015.

Ms. Mastroluca asked Dr. Philander whether he was willing to taking the Special Purpose Examination (SPEX), and Dr. Philander said he did not see what the SPEX would accomplish.

Ms. Mastroluca explained that the purpose of the SPEX is to establish clinical competency, and if Dr. Philander wanted an active license, the Board needed to establish his clinical competency.

Dr. Philander said he was willing to take the SPEX.

Ms. Mastroluca moved that the Board grant Dr. Philander a license contingent upon successful passage of the SPEX. Mr. Duxbury seconded the motion, and it passed, with Dr. Havins voting against the motion and the remaining Board members voting in favor of the motion.

(d) Tammy Lynn Hankins, PA-C

Dr. Prabhu asked Ms. Hankins whether she wanted her application to be considered in closed session, with the public being excluded, and she said that she did not.

Dr. Muro stated that Ms. Hankins had not practiced clinical medicine since 2013, due to legal actions which resulted in incarceration.

Ms. Hankins said she wants to move to Las Vegas, and has found a job at a medical spa there, but it is contingent upon her obtaining a license in Nevada.

Dr. Muro said he had grave concerns regarding everything that was before the Board, in addition to the fact that Ms. Hankins had not practiced clinical medicine since 2013.

Mr. Cousineau asked Ms. Hankins what she planned to do if granted a license in Nevada.

Ms. Hankins said she had secured a job at a medical spa and would be doing plastic surgery injections, in-office procedures, excisions, and assisting with different procedures. She planned to look into getting an urgent care job as well.

Mr. Cousineau stated that earlier in the meeting, the Board members had visited this same matter regarding an individual who has been out of clinical practice for quite a while and the remedy that would allow the Board to be comfortable in getting the individual back into clinical practice. Ms. Hankins had recently recertified with the NCCPA, and that is a recognition of clinical competency.

Ms. Mastroluca moved that the Board grant Ms. Hankins' application for licensure. Dr. Muro seconded the motion, and it passed unanimously.

(e) Charles Edward Kamen, M.D.

Lyn E. Beggs, Esq., appeared with Dr. Kamen as his legal counsel.

Dr. Prabhu asked Dr. Kamen whether he wanted his application to be considered in closed session, with the public being excluded, and he said that he did.

Ms. Mastroluca moved that the Board go into closed session pursuant to NRS 241.030. Mr. Duxbury seconded the motion, and it passed unanimously.

Upon returning to open session, Mr. Duxbury moved that the Board grant Dr. Kamen's application for licensure. Dr. Havins seconded the motion, and it passed unanimously.

(f) Richard Boyd Williams, M.D.

Dr. Prabhu asked Dr. Williams whether he wanted his application to be considered in closed session, with the public being excluded, and he said that he did.

Dr. Havins moved that the Board go into closed session pursuant to NRS 241.030. Ms. Mastroluca seconded the motion, and it passed unanimously.

Upon returning to open session, Dr. Prabhu moved that the Board grant Dr. Williams' application for licensure. Dr. Havins seconded the motion, and it passed unanimously.

(g) Paul Ramirez, M.D.

Dr. Prabhu asked Dr. Ramirez whether he wanted his application to be considered in closed session, with the public being excluded, and he said that he did.

Ms. Mastroluca moved that the Board go into closed session pursuant to NRS 241.030. Dr. Havins seconded the motion, and it passed unanimously.

Upon returning to open session, Mr. Duxbury moved that the Board decline to grant Dr. Ramirez a license by endorsement. Ms. Mastroluca seconded the motion, and it passed unanimously.

Mr. Duxbury moved that the Board grant Dr. Ramirez a license contingent upon successful passage of the Special Purpose Examination (SPEX) within two months. Ms. Arias-Petrel seconded the motion, and it passed unanimously.

(h) Stephen Richard Lauterbach, M.D.

Dr. Lauterbach appeared in Reno. Eddy Luh, M.D., Dr. Lauterbach's proposed preceptor, appeared in Las Vegas.

Dr. Prabhu asked Dr. Lauterbach whether he wanted his application to be considered in closed session, with the public being excluded, and he said that he did.

Dr. Havins moved that the Board go into closed session pursuant to NRS 241.030. Mr. Duxbury seconded the motion, and it passed unanimously.

Upon returning to open session, Mr. Duxbury moved that the Board grant Dr. Lauterbach a license contingent upon completion of a one-year preceptorship with the conditions recommended, that he maintain compliance with the Professional Recovery Network (PRN) program to completion, and that this will be memorialized in an order.

Discussion ensued regarding the number of hours that should be required under the preceptorship, and 1800 hours was the agreed-upon number.

Mr. Duxbury added to his motion a review of Dr. Lauterbach's charts, based on the recommendation, and that Dr. Lauterbach was to return to the Board upon completion of the preceptorship. Dr. Havins seconded the motion, and it passed, with Dr. Nagy abstaining from the motion and the remaining Board members voting in favor of the motion.

(i) Jeffrey Christopher Uy, M.D.

Dr. Prabhu asked Dr. Uy whether he wanted his application to be considered in closed session, with the public being excluded, and he said that he did not.

Dr. Havins stated Dr. Uy had not practiced clinical medicine since 2009. He had taken and passed the ABMS Maintenance of Certification exam, and had also voluntarily participated in a CPEP course. Dr. Uy holds active licenses in Arizona, California, Hawaii, New Mexico and Oregon.

Dr. Prabhu stated Nevada is in need of psychiatrists.

Dr. Uy told the Board he didn't have any immediate plans to go into practice if granted a license in Nevada, but he missed clinical care and academics. He was currently volunteering with the University and would like to expand his involvement there, and possibly transition back into clinical care.

Dr. Havins moved that the Board grant Dr. Uy's application for licensure. Dr. Nagy seconded the motion, and it passed unanimously.

Agenda Item 20

STAFF COMMENTS/UPDATES

Mr. Cousineau reminded the Board members that the Federation of State Medical Boards Annual Meeting would be held April 30 through May 2, and encouraged all Board members who could attend to do so. He said he would also be attending the Administrators in Medicine Annual Meeting on April 29. The FSMB eight-year audit of the Board had commenced, and a site visit had been scheduled by the FSMB team for April 6 through 8, in Reno. He explained the audit is a statutory requirement, and is to test the methodology and efficiency of the investigative processes of the Board. Additionally, the Board has been requested to appear before the Sunset Subcommittee of the Legislative Commission in early May. He said that would be an opportunity to explain the inner workings of the Board.

Ms. Bradley said the lease for the new Las Vegas office space was approved at the January Board of Examiners meeting. Staff had received a draft of what the space might look like and a cost estimate for it. She said it is a little more than what will be covered under the terms of the lease, so it will slightly increase the Board's rent each year to repay the additional cost. It is not a material amount, so staff was just waiting to get a final figure so construction could begin.

Mr. Duxbury asked if there was a timeline on the move. Ms. Bradley said the original goal was to be there next month, but that was not going to happen, so now May or June was the hopeful target. Staff had talked to the current landlord, and they are aware we will need a little more time, as the lease expires at the end of this month.

Agenda Item 21 PUBLIC COMMENT

Dr. Prabhu asked whether there was anyone in attendance who would like to present public comment. No public comment was received.

Agenda Item 22 ADJOURNMENT

Dr. Prabhu adjourned the meeting at 12:11 p.m.

* * * * * *

EXHIBIT 21

EXHIBIT 21

Tammy Lynn HANKINS

License Number: PA2277

License Type:Physician AssistantLicense Status:SuspendedInitial License Date:Mar-06-2020Expiration Date:Jun-30-2023

Public Address:3753 Cherry Tree BlvdPublic City:Lake Havasu City

Public State:ArizonaPublic ZIP Code:86406Public Country:United StatesPublic Phone Number:5202405241

Specialties

Specialty	
Physician Assistant	

Education History

Institution	Degree/Certificate	Date Enrolled	Date To
Olivet College / Olivet, MI	Bachelor of Arts	N/A	May-09-1993
Western Michigan University / Kalamazoo, MI	Bachelor of Science	N/A	Dec-12-1998
Western Michigan University / Kalamazoo, MI	Physician Assistant Degree	Sep-01-1996	Dec-12-1998

License History

License Type	License Status	Effective Date
Physician Assistant	Suspended	Jul-26-2021
Physician Assistant	Summarily Suspended	Jul-26-2021
Physician Assistant	Active	Jun-28-2021

Board Actions

Summary	Attachments	
COMPLAINT Case No. 21-51633-1 June 25, 2021 The Investigative Committee of the Nevada State Board of Medical Examiners filed a formal Complaint against Tammy Lynn Hankins, PA-C, alleging fifty-two (52) violations of the Nevada Revised Statues of (NRS), Chapter 630: NRS 630.400(1)(d) - 8 counts NRS 630.301(4) - 12 Counts NRS 630.301(9) - 12 Counts NRS 630.3062(1)(h) - 5 Counts NRS 630.306(1)(o) - 4 Counts NRS 630.304(1) - 1 Count NRS 630.306(1)(g) - 4 Counts NRS 630.380(1)(c) Complaint: fifty-six (56) pages	Complaint - 21- 51633-1.pdf (/rest/public/data/downloadan id=60de1ec904f436158a5ebb	notation/index.php? o68&entity=\$2y\$10\$63VbNQrO4qVKIUDKhVtbv

Powered by Thentia Cloud (https://www.thentia.com)

Summary	Attachments	
FIRST AMENDED COMPLAINT Case No. 21-51633-1 July 20, 2021 The Investigative Committee of the Nevada State Board of Medical Examiners filed a formal Complaint against Tammy Lynn Hankins, PA-C, alleging fifty-three (53) violations of the Nevada Medical Practice Acts, including: 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, XXXVIII, 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, XXXV, XXXX, XXXIV, XXXIX, XXIII, 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. First Amended Complaint: fifty-six (56) pages.	First Amended Complaint - 21-51633- 1.pdf (/rest/public/data/downloadar id=60ff2b6704f436158a149ba	notation/index.php? i8&entity=\$2y\$10\$YJIsj.ubqVqCowL21DX2J.eF
ORDER OF SUMMARY SUSPENSION Case No. 21-51633-1 July 20, 2021 The Investigative Committee of the Nevada State Board of Medical Examiners summarily suspended Tammy Lynn Hankins, PA-C, license to practice medicine in the State of Nevada pursuant to Nevada Revised Statute 630.326(1). Order: three (3) pages.	■ Order of Summary Suspension - 21- 51633-1.pdf (/rest/public/data/downloadar id=60ff2caf81edb53d2a83442	notation/index.php? 2&entity=\$2y\$10\$PMsuG.6wal/CW./BiRPn2uX

Current Employment Status / Conditions / Restrictions on License / Prior Malpractice Claims

Note: This physician assistant does not have a current medical doctor supervising physician associated with this license and therefore may not practice clinically.

Summary	Attachments
None.	

NTITY	INFORMATION
ENTIT	'Y INFORMATION
Ent	ity Name:
VID	A SPA LLC
Ent	ity Number:
E03	325412016-3
Ent	ity Type:
Dor	nestic Limited-Liability Company (86)
Ent	ity Status:
Acti	ive
For	mation Date:
07/2	22/2016
NV	Business ID:
NV2	20161430784
Ter	mination Date:
Per	petual
Anr	nual Report Due Date:
7/3′	1/2022
Ser	ies LLC:
/	
Res	stricted LLC:

REGISTERED AGENT INFORMATION

Silver Flume Nevada's business Fortal to start/manage your business	
Name of Individual or Legal Entity:	
COOPER COONS, LTD	
Status:	
Active	
CRA Agent Entity Type:	
Registered Agent Type:	
Commercial Registered Agent	
NV Business ID:	
NV20121752051	
Office or Position:	
Jurisdiction:	
CLARK COUNTY	
Street Address:	
10655 PARK RUN DR STE 130, Las Vegas, NV, 89144, USA	
Mailing Address:	
Individual with Authority to Act:	
Fictitious Website or Domain Name:	
	_

OFFICER INFORMATION

☐ VIEW HISTORICAL DATA

Title	Name	Address			Last Updated	Status
Manager Page 1 of	GISSELLE PLATFOOT 1, records 1 to 1 of 1	3225 S. RAINBOW 89146, USA	BLVD, Suite 20	6, Las Vegas, NV,	07/30/2021	Active
		Filir	ng History	Name History	Mergers/Conve	rsions

Return to Search Return to Results

F	ILING HISTORY	
	ENTITY INFORMATION	
	Entity Name:	
	VIDA SPA LLC	
	Entity Number:	
	E0325412016-3	
	Entity Type:	
	Domestic Limited-Liability Company (86)	
	Entity Status:	
	Active	
	Formation Date:	
	07/22/2016	
	NV Business ID:	
	NV20161430784	
	Termination Date:	
	Perpetual	
	Annual Report Due Date:	
	7/31/2022	
	Series LLC:	
	Restricted LLC:	

ile Date	Effective Date	Filing Number	Document Type	Amendment Type	Source	View
7/30/2021	07/30/2021	20211646403	Annual List		External	0
7/24/2020	07/24/2020	20200805546	Annual List		External	0
7/25/2019	07/25/2019	20190060994	Annual List		External	0
07/24/2018	07/24/2018	20180326110- 24	Annual List		External	0
07/13/2017	07/13/2017	20170300205- 00	Annual List		External	0
07/22/2016	07/22/2016	20160324669- 89	Initial List		External	0
7/22/2016	07/22/2016	20160324667- 67	Articles of Organization		External	0
Page 1 of 1, r	records 1 to 7 o	of 7				
		of 7 OT AS OF: 07/25	5/2019			
FILING DAT				Registered Agent		
FILING DAT	E SNAPSHO	OT AS OF: 07/25		Registered Agent		
FILING DAT	E SNAPSHO	OT AS OF: 07/25			ate/Zip/Co	untry
Busines Officer I	E SNAPSHO	Name Change Shares	es Principal Office I		•	-

Back Return to Search Return to Results

Business License Detail Information

License Number:	2003447.081-172
MJBL Number:	
Business:	Vida Spa, LLC 3225 S Rainbow Blvd Las Vegas, NV 89146
Business Telephone:	(937) 638-9684
License Category:	Cosmetology Establishment - Other Services
Status:	License Suspended
Date of License:	12/21/2016
Out of Business Date:	
	Business Owner(s)
Art Matrix, Inc. Platfoot, Gisselle	

Return to Previous Page Return to Business License Database Search Options

NEVADA STATE BOARD OF PHARMACY



985 Damonte Ranch Parkway - Suite 206 • Reno, NV 89521

(775) 850-1440 • 1-800-364-2081 • FAX (775) 850-1444

· Web Page: bop.nv.gov

March 24, 2021

VIA CERTIFIED AND U.S. MAIL

Vida Spa LLC Ms. Gisselle Platfoot 3225 S. Rainbow Boulevard, Suite 107 Las Vegas, NV 89146

Re: CEASE and DESIST/CITATION: Unlicensed Practice (Case No. 20-210)

Dear Ms. Platfoot:

The Nevada State Board of Pharmacy ("BOP") has determined that you are possessing, administering, prescribing and/or dispensing controlled substances and/or dangerous drugs for Nevada patients from your company in violation of federal and state law. Specifically, you do not have a dispensing registration. You are prohibited from possessing, dispensing and/or administering controlled substances and/or dangerous drugs.

You have violated, attempted to violate, assisted or abetted in the violation of or conspired to violate, without limitation, NRS 453.226, NRS 453.316, NRS 453.321(1)(a), NRS 453.331 (1)(c)(d)(f)&(i), NRS 453.381(1), NRS 453.401(1)(a), NRS 639.0727, NRS 639.100(1), NRS 639.23505, NRS 639.281, NRS 639.2813, NRS 639.310, NAC 639.742, 21 U.S.C. § 822(a)(2), 21 U.S.C. § 823(f), 21 U.S.C. § 841(a), 21 U.S.C. § 842(a), 21 U.S.C. § 846 and 21 CFR §§ 1306.03–1306.05.

You are hereby ordered pursuant to NRS 639.2895(1) to immediately CEASE and DESIST possessing, administering, prescribing and/or dispensing controlled substances for Nevada patients from your practice. This letter shall serve as a CITATION pursuant to NRS 639.2895(2) for your unlicensed practice. The Board has assessed you an administrative fine of five thousand dollars (\$5,000.00) pursuant to NRS 639.2895(3).

You must pay this administrative fine within 30 days of receipt of this citation, or otherwise contact Board staff to request an alternative payment plan. Payment must be by *cashier's check*, *certified check* or *money order* made payable to "State of Nevada, Office of the Treasurer," to be received at the Board's Reno office, located at 985 Damonte Ranch Parkway – Suite 206, Reno, NV 89521.

You have the right to appeal this citation by submitting a written request for a hearing to the Board at the Board's Reno office no later than 30 days after receipt of this letter. See NRS 639.2895(2).

Please be aware that the foregoing does not preclude a formal investigation or filing of criminal charges. If you have any questions, please do not hesitate to contact me at 775-850-1440 or c.lee@pharmacy.nv.gov.

Sincerely,

Courtney K. Lee General Counsel

Nevada State Board of Pharmacy

CERTIFICATE OF SERVICE

I certify that I am an employee of the Nevada State Board of Pharmacy, and that on this 25th day of March, 2021, I served a true and correct copy of the foregoing document by Certified U.S. Mail to the following:

Vida Spa LLC Ms. Gisselle Platfoot 3225 S. Rainbow Boulevard, Suite 107 Las Vegas, NV 89146

KRISTOPHER MANGOSING

NEVADA STATE BOARD OF PHARMACY



985 Damonte Ranch Parkway - Suite 206 • Reno, NV 89521

(775) 850-1440 • 1-800-364-2081 • FAX (775) 850-1444

• Web Page: bop.nv.gov

March 24, 2021

VIA CERTIFIED AND U.S. MAIL



Tammy Hankins, PA-C 3753 Cherry Tree Boulevard Lake Havasu City, AZ 86406

Re: CEASE and DESIST/CITATION: Unlicensed Practice (Case No. 20-210)

Dear Ms. Hankins:

The Nevada State Board of Pharmacy ("BOP") has determined that you are possessing, administering, prescribing and/or dispensing controlled substances and/or dangerous drugs for Nevada patients from your practice in violation of federal and state law. Specifically, you do not have a controlled substance registration. You are prohibited from possessing and/or administering controlled substances and/or dangerous drugs.

You have violated, attempted to violate, assisted or abetted in the violation of or conspired to violate, without limitation, NRS 453.226, NRS 453.316, NRS 453.321(1)(a), NRS 453.331 (1)(c)(d)(f)&(i), NRS 453.381(1), NRS 453.401(1)(a), NRS 639.100(1), NRS 639.23505, NRS 639.281, NRS 639.2813, NRS 639.310, 21 U.S.C. § 822(a)(2), 21 U.S.C. § 823(f), 21 U.S.C. § 841(a), 21 U.S.C. § 842(a), 21 U.S.C. § 846 and 21 CFR §§ 1306.03–1306.05.

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Sincerely,

Courtney K. Lee General Counsel

Nevada State Board of Pharmacy

CERTIFICATE OF SERVICE

I certify that I am an employee of the Nevada State Board of Pharmacy, and that on this 25th day of March, 2021, I served a true and correct copy of the foregoing document by Certified U.S. Mail to the following:

Tammy Hankins, PA-C

Tammy Hankins, PA-C 3753 Cherry Tree Boulevard Lake Havasu City, AZ 86406

KRISTOPHER MANGOSINC

NEVADA STATE BOARD OF PHARMACY



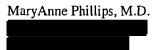
985 Damonte Ranch Parkway - Suite 206 • Reno, NV 89521 (775) 850-1440 • 1-800-364-2081 • FAX (775) 850-1444

· Web Page: bop.nv.gov

March 24, 2021

VIA CERTIFIED AND U.S. MAIL

MaryAnne Phillips, M.D. 10620 Southern Highlands Parkway, #110251 Las Vegas, NV 89102



Re: CEASE and DESIST/CITATION: Unlicensed Practice (Case No. 20-210)

Dear Dr. Phillips:

The Nevada State Board of Pharmacy ("BOP") has determined that you are possessing, administering, prescribing and/or dispensing controlled substances and dangerous drugs for Nevada patients from your practice in violation of federal and state law. Specifically, your controlled substance registration was suspended. You are prohibited from possessing and/or administering controlled substances.

You have violated, attempted to violate, assisted or abetted in the violation of or conspired to violate, without limitation, NRS 453.226, NRS 453.316, NRS 453.321(1)(a), NRS 453.331 (1)(c)(d)(f)&(i), NRS 453.381(1), NRS 453.401(l)(a), NRS 639.100(1), NRS 639.23505, NRS 639.281, NRS 639.2813, NRS 639.310, 21 U.S.C. § 822(a)(2), 21 U.S.C. § 823(f), 21 U.S.C. § 841(a), 21 U.S.C. § 842(a), 21 U.S.C. § 846 and 21 CFR §§ 1306.03–1306.05.

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You must pay this administrative fine within 30 days of receipt of this citation, or otherwise contact Board staff to request an alternative payment plan. Payment must be by *cashier's check*, *certified check* or *money order* made payable to "State of Nevada, Office of the Treasurer," to be received at the Board's Reno office, located at 985 Damonte Ranch Parkway – Suite 206, Reno, NV 89521.

You have the right to appeal this citation by submitting a written request for a hearing to the Board at the Board's Reno office no later than 30 days after receipt of this letter. See NRS 639.2895(2).

Please be aware that the foregoing does not preclude a formal investigation or filing of criminal charges. If you have any questions, please do not hesitate to contact me at 775-850-1440 or c.lee@pharmacy.nv.gov.

Sincerely,

Courtney K. Lee General Counsel

Nevada State Board of Pharmacy

CERTIFICATE OF SERVICE

I certify that I am an employee of the Nevada State Board of Pharmacy, and that on this 25th day of March, 2021, I served a true and correct copy of the foregoing document by Certified U.S. Mail to the following:

MaryAnne Phillips, M.D. 10620 Southern Highlands Parkway, #110251 Las Vegas, NV 89102

MaryAnne Phillips, M.D.

KRISTOPHER MANGOSING

Sherman Washington, JR. MD 2900 N. Green Valley Parkway #114 Henderson, NV, 89014 November 16, 2020 RE: Case #20-19721

Patient Patient

To the Medical Board:

In response to your October 28, 2020 request I am providing answers to each allegation.

Allegation #1 - It is correct that I became the medical director for Vida Spa on or about September 9, 2019.

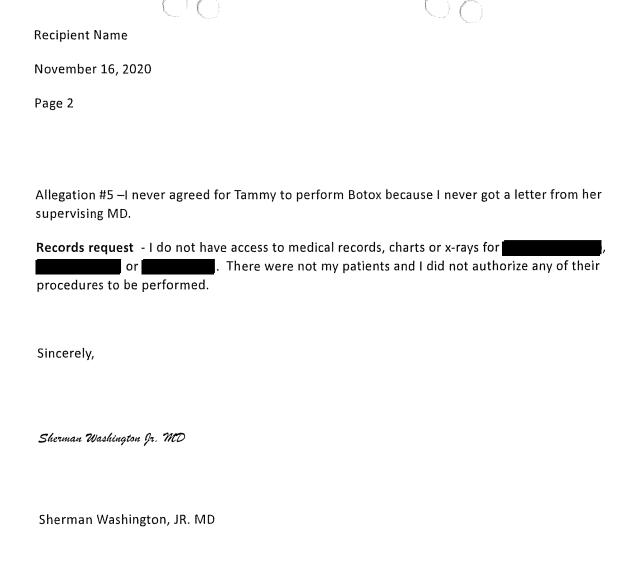
Allegation #2 — While I was the medical director for Vida Spa, I became a supervising doctor for Ms. Hankins. I was told by Vida Spa and by Ms. Hankins that she was a licensed PA-C. I agreed to become her supervising doctor based upon fraudulent information I was given about her license status. I provided all the paperwork regarding my request to supervise Ms. Hankins to the Medical Board and the request to supervise Ms. Hankins was approved.

While I agreed to supervise Ms. Hankins, I specifically told both Vida Spa and Ms. Hankins that she could not perform any procedures until she provided proof that she was working within her scope. I requested the following things; letters from her prior supervising doctor, proof of her current license, completion of a liposuction certification, proof that she passed practical procedure tests. I was assured I would receive all requested documents. After 30 days, I did not receive any of the requested material and I therefore rescinded my agreement to supervise Ms. Hankins. In addition, due to their intentional misrepresentation, I also stopped being the medical director for Vida Spa on November 1, 2019. I was the medical director for less than 60 days.

I never authorized Ms. Hankins to perform liposuction or any other procedures. I was not aware that Ms. Hankins performed liposuction procedures on or about October 2019. I never signed any charts for Ms. Hankins and was not present during any procedures she performed. I was not consulted regarding any procedures Ms. Hankins performed or participated in during my directorship.

Allegation #3 - I did not authorize Ms. Hankins or Vida Spa to prescribe controlled substances on my behalf for any patients.

Allegation #4 j- Management assured me that the office was zoned for the medical procedures performed. The previous Surgeon was performing Liposuction and Botox at the same location.





From:

Sent:

To:

Dr Sherman washington
Monday, November 16, 2020 2:00 PM
Kim A. Friedman
Severed ties with Vida Spas as Tammy's Supervising MD. She failed to bring documentation Subject:

TO: The Nevada State Board of Medical Examiners Attn: Jami Land, Licensing Administrative Assistant 9600 Gateway Drive, Reno, NV 89521 Please be advised that: (Please Print), PA-C or APN, License No. and Sherman Washington, M.D., License No. 15/68
(Please Print) terminated their supervising and/or collaborating agreement as of NOV 1+ 2019 (Date) ⁹rint Name: gnature: Date: Moumberds (Physician Assistant or Medical Doctor Licensee Only) ITE: NAC 630.360(4), a physician assistant shall notify the Board in writing within 72 hours after ige relating to his supervising physician. NAC 630.490(5), a collaborating physician shall immediately notify the Board of the termination boration between the collaborating physician and an advanced practitioner of nursing. complete and mail or fax this form to: Nevada State Board of Medical Examiners Attn: Jami Land, Licensing Administrative Assistant 9600 Gateway Drive, Reno, NV 89521 FAX: (775) 688-2551



MOJAVE HEART AND VASCULAR GROUP

801 S. RANCHO DRIVE Suite A2 LAS VEGAS, NV 89106 Office Number: (702) 480- 3630 Fax: (800) 579-9591

March 26, 2021

RE:

BME Case #20-19721

To:

Kim Friedman, CMBI, Senior Investigator Nevada State Board of Medical Examiners 6010 S. Rainbow Blvd, Bldg. A, Ste. 2

Las Vegas, NV 89118

Dear Kim Friedman,

My apologies for the delay in responding your previous correspondence and the Board's Order to Produce Health Care Records. Both were apparently sent to my previous office located on Charleston Blvd and was never forwarded to my new address. I have now had a chance to review them and can provide the following responses to each of the allegations in your letters as requested.

Sincerely,

Salvador Borromeo III. M.D.



MOJAVE HEART AND VASCULAR GROUP

801 S. RANCHO DRIVE Suite A2 LAS VEGAS, NV 89106 Office Number: (702) 480-3630 Fax: (800) 579-9591

March 26, 2021

RE: BME Case #20-19721

To: Don Andreas

Sr. Investigator Las Vegas Office

NV State Board of Medical Examiners

325. E. Warm Springs Road #225 Las Vegas, NV 89119 702-486-3338 Office 775-848-0831 Cell 702-486-3301 Fax

Dear Mr. Don Andreas.

Here are my responses to the Board regarding the specific allegations made in your correspondence involving the multiple patients in the foregoing case:

- 1. I am unaware when Tammy Hankins was issued her license to practice medicine.
- 2. In May of 2020, I was supervising licensed Nurse Practitioners at the Wound Care Department of Centennial Hospital when I was asked to speak with the owner of a spa called "Vida Spa". I was told they were looking for a "Medical Director", to act in a consulting role. I was also told that they were a spa that only handled NON-INVASIVE cosmetic procedures. I was of the understanding that the spa itself was already in operation, and that both they and their staff were already properly licensed. Finally, I was also told that the position of "Medical Director" would only require one day a month or less of my time in exchange for a monthly payment of \$3,000.00. After meeting with the owner, I agreed to commit one day a month to this position. I was told it would involve supervising their staff on that particular day in order to give my assessments and opinions, answer any of their questions, address procedures, and review and discuss patient files. The position as it was described to me did not involve seeing any patients myself or prescribing any pharmaceuticals. I signed a written agreement they provided to me on May 29, 2020, however I did not receive any payment nor did we agree on when I would schedule my first in-person visit.
- 3. They presented to me a supervising physician agreement to sign for P.A. Tammy Hankins on June 1, 2020, which I thought was odd, but more of a formality at the time based on what had been represented to me and the fact that they only performed non-invasive procedures.

After recognizing that I had been misled, I ended my relationship with Vida Spa in less than a month, and told the owner of the Spa that I was terminating all agreements on or around July 1, 2020.

- 4. Pursuant to the agreement, they were to keep all medical records at their facility. My role was supposed to be limited to that of a consultant, and it was my understanding that the cosmetic procedures were non-invasive ones that were being performed by properly licensed individuals. In addition, we did not discuss to me writing or authorizing any prescriptions, so I presumed they already had someone who was doing so if needed. I had agreed to be paid \$3,000.00 per month for what I believed was going to be one day per month of consultation work at their Spa. We did not yet agree as to a start date when I would come in for my first visit, and I had not yet received any compensation from them.
- 5. I was told that the Spa was already been in operation before I signed any agreement. I was also told they employed a licensed Physician's Assistant and Nurse Practitioner, so I assumed they already were maintaining proper procedures with respect to the handling and dispensing of any controlled substances. But once again, even though I had just signed their agreement, we had not yet agreed upon a start date for me to make my first in-person visit to their facility.

The day I signed the supervision agreement, on June 1st, I was surprised to receive a phone call from said licensed Physician's Assistant, Ms. Hankins, and asked to authorize a prescription on her behalf. This was not supposed to be part of my duties as Medical Director. However, since Ms. Hankins was a licensed P.A., and she told me she had examined and evaluated the patient in person, I presumed both Ms. Hankins and the Spa were following appropriate procedures for dispensation of medication. I therefore authorized this prescription for her, as well as a number of other prescriptions in the couple of weeks afterwards during the month of June, 2020 pending my first visit to the facility. I think it should be noted, however, that June, 2020 was also the height of the COVID pandemic, when everyone was highly concerned about the virus' transmission. At most medical facilities, there were protocols in place to ensure as little direct contact as possible. At Centennial Hospital, where I was supervising a number of N.P.'s, it was (and still is) protocol for Doctors to be permitted to authorize prescriptions strictly based upon the representations made by licensed NP's, without ever directly examining the patients ourselves (I confirmed this with my supervisor, who is the Program Director of Advanced Wound Care Center at Centennial Hospital). This limits contact, and helps minimize the spread of COVID. Since this was the protocol being used at Centennial Hospital Wound Care Center, I presumed it was also acceptable protocol at the time to authorize the prescriptions requested by Ms. Hankins, who was herself a duly licensed P.A. who presented to me that she had seen and examined the patients in person herself.

- 6. In no way was I trying to assist an unlicensed person to engage in the practice of medicine. I was told this spa only handled non-invasive cosmetic procedures that were within the scope and licensing of those who were performing them.
- a, b, c, d, e. I had no knowledge at the time that Ms. Hankins was performing invasive liposuction procedures on patients.
- 7. I had no knowledge of any procedures that were being performed at a location that was not a properly licensed facility. We did not yet agree as to a start date when I would come to do my first in-person consultation.
- 1. We did not have a written termination agreement. I terminated my agreement in a telephone call sometime on or before July 1, 2020.
- 2. It was the height of the COVID pandemic, and as mentioned previously, protocols were in place to limit doctor/patient exposure. I was relying upon the representations made by a

licensed Physician's Assistant, which I believed at the time were sufficient. The scope of my engagement as Medical Director was supposed to be limited, and the agreement they asked me to sign provided for the Spa to maintain all medical records. Again, it was my understanding at the time I agreed to act as Medical Director that these were all non-invasive procedures performed by qualified individuals in a licensed facility.

- 3. Other than authorizing the prescriptions for patients as specifically requested by Ms. Hankins, I have and had NO business or financial relationship with Santa Maria Pharmacy.
- 4. I have and had received NO compensation from or for patient specific controlled substance prescriptions I wrote for Vida Spa patients.

Sincerely,

Salvador Borromeo, III MD

10:18 1



<u>Done</u>

8 of 12





32255 Rainbow Flux suiterof

LES VEGAS, NV F9146

This Agreement is between VIDA SPA LLC, and Salvador Borromeo, MD

Entered into on this 29 day of Nat , 2020.

Whereas, Medical Doctor, is a physician who is eligible to be duly licensed under the Laws of state of Nevada. Desires to employ Medical Doctor and physician desires to accept such employment subject to the terms and conditions become set forth. Now, therefore, in consideration of the mutual covenants and agreements bereinafter Contained, the parties hereby agree as follows:

GENERAL PRINCIPALS OF PRACTICE AND DUTIES:

- Dr. Salvador Borromero is to supervise as the medical director for the physician
 assistants (PAs) and other licensee. Physician agrees to maintain at all times during the
 term of this agreement a current valid Medical license. Malpractice, DEA and pharmacy
 license to practice medicine in the State of Nevada.
- At least once a month, the supervising physician shall spend part of a day at any location where the physician assistants and all other licensee provides medical services to act as a consultant to the physician assistant and to monitor the quality of care provided by the physician assistant.
- A physician who supervises a physician assistant shall develop and carry out a program
 to ensure the quality of care provided by physician assistants. The program must include,
 without limitation;
- a. An assessment of the medical competency of the physician assistants,
- b. A review and initialing of selected charts:

10:18 1



Done

9 of 12

from that must go through Gisselle or whoever she may assign in her place:

- Placing orders for products
- Gisselle or designated person by her is the <u>ONLY</u> one who can give pricing, discounts, free goods to the patients.
- Gisselle or whomever she may assign me the <u>ONLY</u> ones who can dispense products that
 are locked in the cabinets.

Compensation and terms of agreement

- Dr. Salvador Borromero as Vida Spa, LLC medical director will be compensated at the rate of \$3,000 per month for the first two (2) months as directorship fee.
- Beginning on the third (3) months, the rate will increase to \$3,500.
- This will be a one year agreement. A minimum of 30 day notice is required by either
 party prior to termination. Except, any ventiod Nevada State board or malpractice
 violation committed by the heenses in which case termination will be immediate.

Payroll

Payroll will process the psycheck once per month on the fourth Thursday of each month.

I hereby submit my signature below to confirm that I have read the above in its entirety and agree to follow the rules as stated.

Name Salvador Borromeosignature

Date

Saranae

10:18 4



Done

10 of 12



Included within this agreement and the signer also agrees to, a non-disclosure agreement as a condition of employment. Employees who improperly use or disclose trade secrets or confidential business information will be subject to disciplinary action, up to and including termination of employment and legal action, even if they do not actually benefit from the disclosed information.

Ownership of Patient Records

The Physician recognizes and agrees that all case historics, personal and regular files notes concerning patients of VIDA SPA, LLC including, without limitations, patients consuited, interviewed, treated, and cared for by Physician during his/her employment by the VIDA SPA, LLC shall belong to and remain the property of VIDA SPA, LLC. All charts are to be completed by the end of the day. All medical records are the property of VIDA SPA, LLC and are not to be removed from the facility for any reason.

OSHA Policies

Physician will abide by and enforce OSHA policies and procedures as required

Job Descriptions

VIDA SPA, LLC maintains job descriptions to aid in orienting new employees to their jobs, identifying the requirements of each position, establishing furing criteria, setting standards for employee performance evaluations, and establishing a basis for making reasonable accommodations for individuals with disabilities.

The management and the hiring manager prepare job descriptions when new positions are created. Existing job descriptions are also reviewed and revised in order to custice that they are up to date. Job descriptions may also be rewritten periodically to reflect any changes in position duties and responsibilities. All employees will be expected to help ensure that their job descriptions are accurate and current, reflecting the work being done.

imployees should remember that job descriptions do not necessarily cover every task or duty not might be assigned, and that additional responsibilities may be assigned as necessary. Contact a management if you have any questions or concerns about your job description.

01/05/2021

Dena McClish, Investigator Nevada State Board of Pharmacy 1050 E. Flamingo rd, Suite E217, Las Vegas NV 89119 Office: 702-486-6420 Ext. 154 Fax: 702-486-7903

Email: dmcclish@pharmacy.nv.gov

Re: Nevada Board of Pharmacy Investigative Case 20-211

Dear Ms. McClish,

While acting as the Medical Director for Vida Spa for the month of June 2020, I have prescribed controlled substances for their patients that will undergo invasive procedures as part of their conscious sedation and pain control. The prescription for these controlled substances were given to me with the name of the individual patients with corresponding medications and doses written by the Vida Spa's nurse or medical assistant for my approval and signature. These are patients that are scheduled to undergo procedures for the following day. The written prescriptions are then brought to Pharmacy Santa Maria which delivers the medications to the Vida Spa location. The medications which are accepted by the Vida Spa facility are then administered to the patient shortly before the scheduled procedure. This is done by the nurse assisting with the procedure or by Dr. Mary Anne Phillips who is employed by Vida Spa. The medications especially the controlled substances are stored in a secured and locked cabinet. Medications that are unused are disposed into the red-colored sharp containers which include medications for patients that have cancelled their procedures.

Included with this letter are copies of the charts of patients who received the controlled substances that I have prescribed. Please free to contact me for further information.

Respectfully

Salvador G Borromeo MD

Mojave Heart and Vascular Group:

Profile

Tammy Lynn HANKINS

File Number



Nevada Business License Number

None

Date of Birth



Street

3753 Cherry Tree Blvd

Address Line 2

None

City

Lake Havasu City

State

Arizona

Postal Code

Employer Addresses

No active employers.

Licensure

License Type: Physician Assistant

License Number: PA2277

Status: Suspended

86406

Mailing Address

Street

3753 Cherry Tree Blvd

Address Line 2

None

City

Lake Havasu City

State

Arizona

Postal Code

86406

Telephone

5202405241

E-mail Address

tammyhankins@yahoo.com

9/13/21, 8:53 AM

Supervisor (Licensee Supervising)	۰	Supervisee (Licensee Being Supervised)	۲	Relationship Type	Date of Association	▼ Date of Disa:
BORROMEO, Salvador Garcia		HANKINS, Tammy Lynn		Primary Supervisor	Jun-10-2020	Nov-02-2020
CALINESCU, Cornell Victor		HANKINS, Tammy Lynn		Primary Supervisor	Mar-09-2020	Mar-09-2020



NOTIFICATION TO NEVADA STATE BOARD OF MEDICAL EXAMINERS OF SUPERVISION OF PHYSICIAN ASSISTANT

STATE OF NEVADA

CONFIRMATION COPY
) ss. NOTE: NO FEE REQUIRED

COUNTY OF

COMES NOW , M.D., being first duly sworn, who deposes and says that: I, the undersigned physician, am duly licensed to practice medicine in the state of Nevada by the Nevada State Board of Medical Examiners (Board), possess an active license to practice medicine in the state of Nevada, License Number, and am in good standing with the Board. I am engaged in the practice of medicine in the state of Nevada, am current on all my required CME and am not aware of any disciplinary action, formal or informal; pending against me by the Board or any other jurisdiction's medical licensing entity. I have checked with the Board and determined that the physician assistant I am going to supervise has never been formally disciplined by the Nevada State Board of Medical Examiners.

I have read and am aware of the provisions of Chapter 630 of the Nevada Revised Statutes concerning the duties of a supervising physician, as well as Chapter 630 of the Nevada Administrative Code, which are the regulations adopted by the Board concerning a physician's relationship with a physician assistant and/or advanced practitioner of nursing. I have read and am aware of the regulation of the Nevada State Board of Medical Examiners under Chapter 630 of the Nevada Administrative Code that precludes a physician from simultaneously supervising more than three physician assistants or collaborating with more than three advanced practitioners of nursing, or with a combination of more than three physician assistants and advanced practitioners of nursing, without first filing a petition with the Board for approval to supervise more, and the requirement that I prove to the satisfaction of the Board that the circumstances of my practice necessitate more and that I will be able to supervise/collaborate with the greater number in a satisfactory manner.

I hereby certify that this relationship does not violate the limitation cited above concerning the total number of physician assistants or advanced practitioners of nursing with whom I may simultaneously supervise or collaborate. The supervision of medical services of a physician assistant by a supervising physician, may include, without limitation, supervision that is performed electronically, telephonically or by fiber optics from within or outside this State or the United States. A physician assistant's use of equipment may include the transfer of information concerning the medical condition of a patient in this State electronically, telephonically or by fiber optics from within or outside this State or the United States. Further, this relationship will not begin until I am in receipt of a file-stamped copy of this Notification bearing the receipt stamp of the Board thereon. Upon receipt of same, I will be supervising the following named physician assistant at the following practical location(s):

Name of Physician Assistant Practice Location(s) AND Telephone No. (use extra page if necessary)

I am aware that the original copy of this Notification will be placed in my licensing file at the offices of the Board, and that I must immediately notify the board, in writing, of the termination of this relationship.

WHEREFORE, I set my hand this \(\) day of \(\)	<u>v</u> , 20 <u>70</u> .	Serriones	
Supervising Physician's Name (Print or Type)		Supervising Physician's Signature	
COMES NOW physician assistant, have read and am aware of the provision		duly sworn, who deposes and says that: I, the until the Nevada Revised Statutes and the Nevada Administr	

gned Code as those laws apply to physician assistants. I am aware that a copy of this Notification will be placed in my licensing file at the offices of the Board, and, that the provisions of the Nevada Administrative Code require that if this relationship is terminated, my failure to immediately notify the Board of the termination or my continuing to practice this portion of my practice until such time as I advise the Board of my new supervising physician is grounds for disciplinary action against me. In accordance with NAC 630.360(4), a physician assistant shall notify the Board in writing within 72 hours after any change relating to his supervising physician.

WHEREFORE, I set my hand this Physician Assistant's Name Physician Assistant's Signature

The above-named Physician Assistant's Name

being first duly sworn, appeared before me on the

, 2070 and in my presence,

MUHRYN CACERES

NOTARY PUBLIC

STATE OF NEVADA

Certificate No: 18-1008-1

Commission Expires: 10-07-2021

exacuted this document consisting of one (1) page.

VOISIV

Completed original form is to be mailed directly Nevada State Board of Medical Examiners 9600 Gateway Drive

Reno, NV 89521

being first duly sworn, appeared before me on the

ocument consisting one

and in my presence

MD12423 PA51633

NOTICE OF TERMINATION OF SUPERVISING AND/OR COLLABORATING AGREEMENT RECEIVED

NOV 0 2 2020 NEVADA STATE BOARD OF MEDICAL EXAMINERS

To:

The Nevada State Board of Medical Examiners

ATTN: Licensing 9600 Gateway Drive Reno, NV 89521

CONFIRMATION COPY

PA lic# 2277

Please be advised that:	
TAMMY HANKINS, TA-E or ATTN, License No	, and
(Please Print)	
SAZVADOR BORROMU M.D., License No. 87	20
(Please Print)	
terminated their supervising and/or collaborating agreement as of _	07-01-2020
	(Date)
Print Name SALVADOR 6. BORROND W)	
3.	1 1
Signature: Sella Redu	Date: 10/28/2027)
[Physician Assistant or Medical Doctor Licensee Univ]	

NOTE:

Per NAC 630.360(4), a physician assistant shall notify the Board in writing within 72 hours after any change relating to his supervising physician.

Per NAC 630.490(5), a collaborating physician shall immediately notify the Board of the termination of collaboration between the collaborating physician and an advanced practitioner of nursing.

Please complete and mail this form to: Nevada State Board of Medical Examiners 9600 Gateway Drive Reno, NV 89502-2144

EXHIBIT 30

EXHIBIT 30



6010 S. Rainbow Blvd., Bldg. A, Ste. 2 Las Vegas, NV 89118

Rachakonda D. Prabhu, M.D. Board President

Edward O. Cousineau, J.D. Executive Director

December 15, 2020

Tammy Hankins, PA-C 3753 Cherry Tree Blvd. Lake Havasu City, AZ 86406

RE: BME CASE #: 20-19721 PATIENT: DOB: PATIENT: DOB: PATIENT: : DOB: PATIENT: DOB: PATIENT: DOB: PATIENT: DOB: PATIENT: : DOB: PATIENT: ; DOB: PATIENT: ; DOB: PATIENT: DOB: PATIENT: ; DOB: PATIENT: : DOB: PATIENT: : DOB: PATIENT: DOB: PATEINT: ; DOB: PATEINT: : DOB: PATIENT: DOB: PATIENT: ; DOB: PATIENT: DOB: PATIENT: : DOB: **PATIENT:** DOB: PATIENT: : DOB: PATIENT: DOB: PATIENT: : DOB: PATIENT: : DOB: PATIENT: ; DOB: **PATIENT:** DOB:

Dear Ms. Hankins

We have received information and a complaint regarding your medical treatment of the above named patients. The complaint alleges your care and treatment of the patients may have fallen below the standard of care and you were practicing medicine without a license from the Nevada State Board of Medical Examiners.

Telephone 702-486-3300 • Fax 702-486-3301 • www.medboard.nv.gov • nsbme@medboard.nv.gov

It is alleged:

- 1. The patient presented to you on or around June 27, 2020, for an abdominal liposuction with fat transfer to the buttocks at Vida Spa located at 3225 S. Rainbow Blvd., Suite 206 Las Vegas, NV 89146.
- 2. Although the patient had significant blood loss during the procedure and was lethargic, disoriented cold, weak pulses and had difficulty breathing you discharged the patient, knowingly placing the patient in extreme danger.
- 3. The patient was placed into a wheelchair; however, the patient's daughter was unable to help her inside the car. The patient had a syncopal event in the parking lot of Vida Spa and fell to the pavement. EMS was called and the patient was transported to the hospital.
- 4. The patient was diagnosed with severe sepsis without septic shock, acute metabolic encephalopathy, small bowel perforation x4, duodenal perforation, LLQ hernia, acute blood loss anemia, hypernatremia and hyperchloremia, severe dehydration and hypokalemia and underwent surgical repair.
- 5. Spring Valley Hospital made multiple attempts to contact Vida Spa; however, no one at Vida Spa, or yourself, contacted the hospital or followed up with the patient. You left the patient abandoned and in critical condition.

It is further alleged:

- 6. Dr. Borromeo is your supervising physician who also wrote the prescriptions for Alprazolam and Oxycodone for this patient prior to the procedure; however, the patient was never examined by Dr. Borromeo, therefore Dr. Borromeo did not have a bona fide patient physician relationship with the patient. In addition, Dr. Borromeo was not onsite during the procedure; however, you were in possession of and assisted in the administration of patient specific controlled substances including versed and Percocet to the patient during the procedure. Neither you nor Dr. Phillips have a CS license, or a dispensing license, with the Nevada State Board of Pharmacy therefore, you are unable to possess or dispense controlled substances without a licensed physician onsite or without orders created by a licensed physician who has conducted an examination of the patient.
- 7. You are failing to maintain accurate medical records and falsified medical records for patient Chavez for documenting medications and controlled substances as being ordered by Dr. Borromeo; however, Dr. Borromeo never examined the patient prior to prescribing the controlled substances and dangerous drugs, nor was Dr. Borromeo present during the liposuction procedure at Vida Spa. The patient has never met Dr. Borromeo and therefore does not have a bona fide patient physician relationship with Dr. Borromeo.

It is further alleged:

- 8. You are engaging in conduct which is intended to deceive by documenting Dr. Borromeo's name as the ordering physician for multiple patients at Vida Spa when Dr. Borromeo was not present during the procedures, nor did Dr. Borromeo have a bona fide patient physician relationship with the patients at Vida Spa.
- 9. You are failing to maintain accurate and complete medical records and falsifying medical records for multiple patients of Vida Spa for documenting medications and controlled substances as being ordered by Dr. Borromeo; however, Dr. Borromeo did not examine multiple patients prior to prescribing controlled substances and dangerous drugs, nor was Dr. Borromeo present during multiple liposuction procedures.
- 10. You performed liposuction procedures at Vida Spa, LLC located at 3225 S. Rainbow Blvd., Suite 107 Las Vegas, NV 89146; however, this facility is not licensed as a medical facility therefore; you may be in violation of NRS 630.373.

It is further alleged:

- 11. On March 6, 2020, you appeared before the Nevada State Board of Medical Examiners for consideration of acceptance of application for licensure. The Board granted approval of your license effective March 6, 2020; however, you were deceptive with the Board as you had been practicing medicine without a license in the State of Nevada as early as October of 2019, and without a supervising physician:
- a. On October 8, 2019, you independently performed a liposuction procedure at Vida Spa on DOB: DOB: without a medical license and without a supervising physician.
- c. On October 10, 2019, you independently performed a liposuction procedure at Vida Spa on DOB: DOB: without a medical license and without a supervising physician.
- 12. You practiced medicine as a physician assistant without being licensed by the Nevada State Board of Medical Examiners which could result in a category D felony.

In addition please provide a response to the following questions:

- 1. Please provide a detailed explanation as to why you had access to, possession of, and administered patient specific controlled substances without a Nevada State Board of Pharmacy license or DEA registration.
- 2. Please provide a detailed explanation as to why patient specific controlled substance prescriptions were delivered directly to Vida Spa for patients you performed

liposuction procedures on. In addition, please provide a detailed explanation as to why unlicensed staff at Vida Spa had access to patient specific controlled substances which were located in an unlocked room and refrigerator.

- 3. Please provide a detailed explanation as to how the remaining patient specific controlled substances, which were delivered to Vida Spa and administered to the patient during the liposuction procedures, were destroyed following the procedures.
- 4. On multiple patient charts you documented pregnancy test results; please explain how you performed the pregnancy tests for patients at Vida Spa.

According to these allegations, you may have violated the Nevada Medical Practice Act, Nevada Revised Statutes, Chapters 629 and 630, and Nevada Administrative Code, Chapters 629 and 630 (NMPA).

In order to determine whether or not there has been a violation of the NMPA, <u>please provide a written response to each allegation noted above</u>. Please include any further information you believe would be useful for the Board to make a determination in this matter. <u>Please reply to this request within 21 calendar days</u>.

The Nevada State Board of Medical Examiners investigates all information received concerning possible violations of the NMPA. We make no determination as to whether or not there has been a violation of the NMPA until a thorough investigation is completed. As a physician under investigation by the Board, you are required by the NMPA to provide the requested information, and your cooperation is not subject to the whistle-blower protections provided to physicians in NRS 630.364(3).

Please be advised that if the particular allegations referenced above did occur, and depending on the facts and circumstances, then you may have violated the NMPA, specifically including but not limited to: NRS 630.301(4),(9), NAC 630.040, NRS 630.304(1), **NRS** 630.306(1)(b)(1),(2),(3),(c), 630.3062(1)(a)(c)(h), NRS NRS 630.020(1)(2)(4), **NRS** 630.400(1)(b)(d)(f), (2)(a), NAC 630.230(1)(a)(d).

Respectfully

Kim Friedman, CMBI Sr. Investigator Las Vegas Office







Tammy Hankins, PA-C 3753 Cherry Tree Blvd. Lake Havasu City, AZ 86406

EXHIBIT 31

EXHIBIT 31





6010 S. Rainbow Blvd., Bldg. A, Ste. 2 Las Vegas, NV 89118

Rachakonda D. Prabhu, M.D. Board President



Edward O. Cousineau, J.D. Executive Director

Second Request

January 29, 2021

Tammy Hankins, PA-C 3753 Cherry Tree Blvd. Lake Havasu City, AZ 86406

RE: BME CASE 20-19721 PATIENT: DOB: PATIENT: : DOB: PATIENT: : DOB: PATIENT: ; DOB:| PATIENT: : DOB: PATIENT: DOB: PATIENT: : DOB: PATIENT: DOB: PATIENT: DOB: PATIENT: : DOB: PATIENT: ; DOB: PATIENT: ; DOB: PATIENT: ; DOB: PATIENT: : DOB: PATEINT: : DOB: PATEINT: DOB: PATIENT: : DOB: PATIENT: ; DOB: PATIENT: DOB: PATIENT: DOB: PATIENT: DOB: PATIENT: : DOB: PATIENT: PATIENT: : DOB: PATIENT: DOB: PATIENT: DOB: PATIENT: DOB:

Telephone 702-486-3300 • Fax 702-486-3301 • www.medboard.nv.gov • nsbme@medboard.nv.gov Rev. 10-15-2020

NSBME 0358

Dear Ms. Hankins.

This is the <u>second request</u> for your reply and a copy of the health care records regarding the patients associated with this case. Please provide the requested reply to the allegations. Failure to comply with an Order of the Board constitutes grounds for initiating disciplinary action. *See* NRS 630.3065. **Please reply to this request within 15 days.**

Be advised that your failure to produce and make available health care records to an authorized representative or Investigator of the Board, as prescribed by Nevada law is grounds for the Investigative Committee to initiate a Formal Complaint against you, which may result in disciplinary action or denial of licensure (NRS 629.061; 630.3062(4); 630.352).

Providing the requested information is deemed a professional obligation of any provider under investigation by the Board and shall not be deemed to be cooperation subject to the whistle-blower protections provided to physicians in NRS 630.364(3).

Enclosed is a copy of the original letter sent to you on December 15, 2020.

Should you have any questions you may contact me at (702) 486-3339.

Respectfully

Kim Friedman, CMBI

Sr. Investigator Las Vegas Office

The Investigative Committee of the Board of Medical Examiners of the State of Nevada

Tammy Hankins, PA-C

License No. PA2277

Case No. 20-19721

Case No. 20-19721

ORDER TO PRODUCE HEALTH CARE RECORDS

The Investigative Committee (IC) of the Board of Medical Examiners of the State of Nevada sends greetings to:

Tammy Hankins, PA-C 3753 Cherry Tree Blvd. Lake Havasu City, AZ 86406

Pursuant to the authority of Nevada Revised Statute (NRS) 630.311(1), the IC directs you to produce and deliver to the Nevada State Board of Medical Examiners, the materials as set forth in this Order:

1. A formal written response to the allegations regarding the letter dated December 17, 2020.

Said records shall be provided to an investigator of the Nevada State Board of Medical Examiners within 15 days of service of this Order (Investigation Division, ATTN: Kim Friedman, Nevada State Board of Medical Examiners, 6010 S. Rainbow Blvd., Bldg. A, Suite 2 Las Vegas, NV 89118). Failure to comply and produce said records in the aforesaid manner may subject you to potential disciplinary action, to include a violation of NRS 630.3065(2)(a) and NRS 630.3062(4); further, the Investigative Committee may seek administrative sanctions as set forth in NRS 630.352.

Additionally, compliance with this order is deemed compulsory and shall not be deemed to be cooperation subject to the protections provided to a physician pursuant to NRS 630.364(3).

Dated this 29th day of January, 2021.

NEVADA STATE BOARD OF MEDICAL EXAMINERS INVESTIGATIVE COMMITTEE

UM MUNDMED

Victor M. Muro, M.D., Chairman Nevada State Board of Medical Examiners Investigative Committee

NSBME 0361

Rev. 10-15-2020

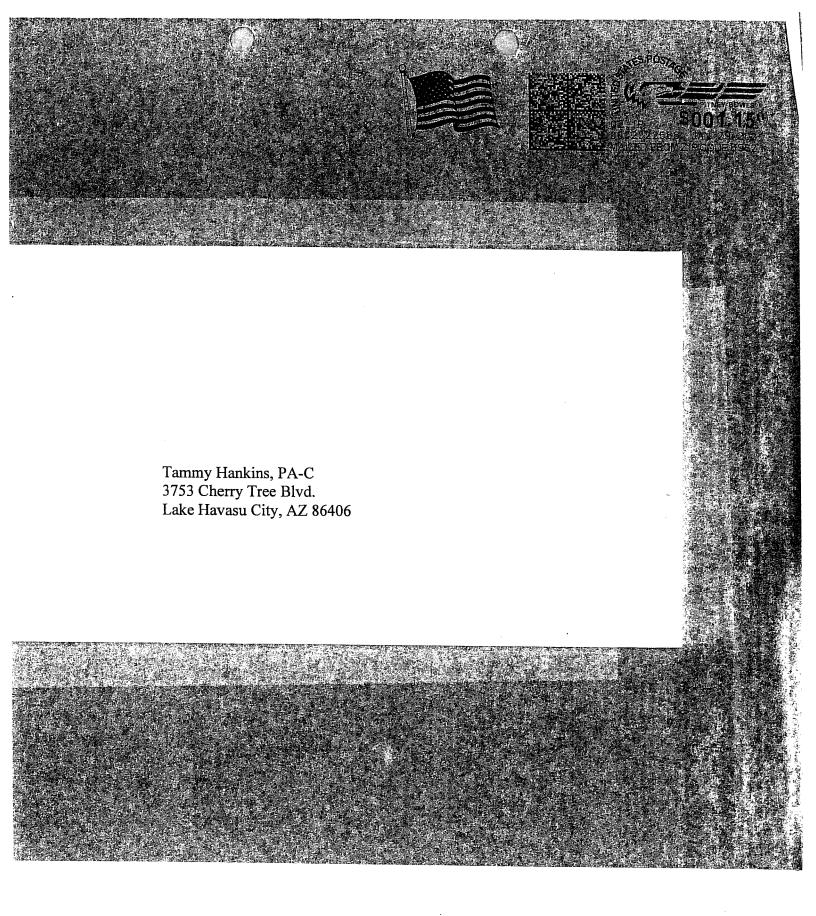


EXHIBIT 32

EXHIBIT 32



325 E. Warm Springs Road, Suite 225 Las Vegas, NV 89119

Rachakonda D. Prabhu, M.D.

Board President

Edward O. Cousineau, J.D. Executive Director



Final Request

February 22, 2021 **VIA CERTIFIED MAIL**

Tammy Hankins, PA-C 3753 Cherry Tree Blvd. Lake Havasu City

RE: BME CASE #: 20-19721 PATIENT: ; DOB: 1 PATIENT: ; DOB: PATIENT: DOB: PATIENT: DOB: PATIENT: : DOB: PATIENT: ; DOB: PATIENT: ; DOB: I PATIENT: : DOB: PATIENT: ; DOB: PATIENT: DOB: PATIENT: : DOB: PATIENT: DOB: PATIENT: : DOB: PATIENT: DOB: PATEINT: DOB: PATEINT: ; DOB: PATIENT: ; DOB: PATIENT: : DOB: PATIENT: DOB: PATIENT: : DOB: I PATIENT: : DOB: PATIENT: DOB: PATIENT: : DOB: PATIENT: : DOB: PATIENT: ; DOB: PATIENT: ; DOB: ; DOB:

Dear Ms. Hankins,

This is the <u>final request</u> for your reply regarding the patient's associated with this case. Please provide the requested reply to the allegations. You received an Order to reply with the letter dated January 29, 2021, but have not yet complied. Failure to comply with an Order of the Board constitutes grounds for initiating disciplinary action. NRS 630.3065. Failure to produce and make available health care records to an authorized representative or Investigator of the Board, as prescribed by Nevada law is also grounds for initiating disciplinary action or denial of licensure. NRS 629.061; 630.3062(4); 630.352. <u>Please reply to this request within 10 calendar days.</u>

Providing the requested information is deemed a professional obligation of any physician under investigation by the Board and shall not be deemed to be cooperation subject to the whistle-blower protections provided to physicians in NRS 630.364(3).

Enclosed is a copy of the original letter sent to you on December 15, 2020, and the Second Request and Order to Reply sent to you on January 29, 2021.

Should you have any questions you may contact me at (702) 486-3339.

Respectfully,

Kim Friedman, CMBI

Sr. Investigator Las Vegas Office

The Investigative Committee of the Board of Medical Examiners of the State of Nevada

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4
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In the Matter of the Investigation of:

7
Tammy Hankins, PA-C

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License No. PA2277

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ORDER TO PRODUCE HEALTH CARE RECORDS

The Investigative Committee (IC) of the Board of Medical Examiners of the State of Nevada sends greetings to:

Tammy Hankins, PA-C 3753 Cherry Tree Blvd. Lake Havasu City, AZ 86406

Pursuant to the authority of Nevada Revised Statute (NRS) 630.311(1), the IC directs you to produce and deliver to the Nevada State Board of Medical Examiners, the materials as set forth in this Order:

1. A formal written response to the allegations regarding the letter dated December 17, 2020.

Said records shall be provided to an investigator of the Nevada State Board of Medical Examiners within 15 days of service of this Order (Investigation Division, ATTN: Kim Friedman, Nevada State Board of Medical Examiners, 6010 S. Rainbow Blvd., Bldg. A, Suite 2 Las Vegas, NV 89118). Failure to comply and produce said records in the aforesaid manner may subject you to potential disciplinary action, to include a violation of NRS 630.3065(2)(a) and NRS 630.3062(4); further, the Investigative Committee may seek administrative sanctions as set forth in NRS 630.352.

Additionally, compliance with this order is deemed compulsory and shall not be deemed to be cooperation subject to the protections provided to a physician pursuant to NRS 630.364(3).

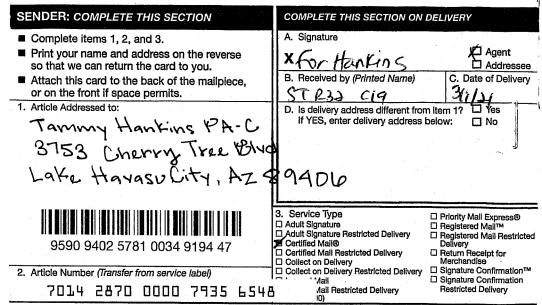
Dated this 29th day of January, 2021.

NEVADA STATE BOARD OF MEDICAL EXAMINERS INVESTIGATIVE COMMITTEE

UM MUNDMED

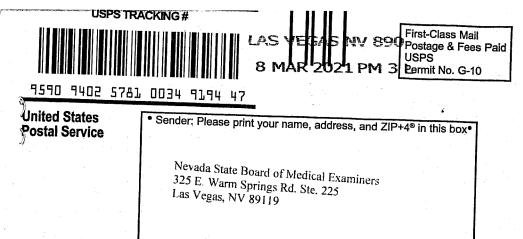
Victor M. Muro, M.D., Chairman Nevada State Board of Medical Examiners Investigative Committee

NSBME 0366 Rev. 10-15-2020



PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt



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	7018	7018	ST. LOD Sent To Tammy Hantins PA. Street and Apt. Ms., of PO Bo. Ms. City, State, 2P449 Life Havasu City, AZ	89406	

NEVADA STATE BOARD
OF MEDICAL EXAMINERS
325 E. Warm Springs Road, Suite 225
Las Vegas, Nevada 89119

EXHIBIT 33

EXHIBIT 33



From:

Donald A. Andreas

Sent:

Friday, March 19, 2021 11:46 AM

To:

Kim A. Friedman

Subject:

FW: FW: BME Matter 20-19721

Don Andreas Sr. Investigator Las Vegas Office NV State Board of Medical Examiners

325. E. Warm Springs Road #225 Las Vegas, NV 89119 702-486-3338 Office 775-848-0831 Cell 702-486-3301 Fax

From: Microsoft Outlook

Sent: Friday, March 19, 2021 11:46 AM

To: Donald A. Andreas

Subject: Relayed: FW: BME Matter 20-19721

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

'tammyhankins@yahoo.com' (tammyhankins@yahoo.com)

Subject: FW: BME Matter 20-19721



From: Donald A. Andreas

Sent: Thursday, May 06, 2021 12:54 PM

To: Kim A. Friedman

Subject: FW: BME Matter 20-19721 **Attachments:** 20-19721 HANKINS PA-C.pdf

Importance: High

Don Andreas
Sr. Investigator
Las Vegas Office
NV State Board of Medical Examiners

325. E. Warm Springs Road #225 Las Vegas, NV 89119 702-486-3338 Office 775-848-0831 Cell 702-486-3301 Fax

----Original Message-----From: Donald A. Andreas

Sent: Friday, March 19, 2021 11:46 AM To: 'tammyhankins@yahoo.com'

Cc: Kim A. Friedman

Subject: FW: BME Matter 20-19721

Importance: High

Don Andreas
Sr. Investigator
Las Vegas Office
NV State Board of Medical Examiners

325. E. Warm Springs Road #225 Las Vegas, NV 89119 702-486-3338 Office 775-848-0831 Cell 702-486-3301 Fax

-----Original Message-----From: Kim A. Friedman

Sent: Friday, March 19, 2021 11:44 AM

To: Donald A. Andreas

Subject: BME Matter 20-19721

Dear Ms. Hankins,

Please see the attached copies of the letters sent regarding the above BME matter. It is important that you contact me as soon as possible to discuss this Board matter.

Thank you,

----Original Message-----

From

Sent: Friday, March 19, 2021 10:37 AM

To: Kim A. Friedman

Subject: Scanned from a Xerox Multifunction Printer

Please open the attached document. It was scanned and sent to you using a Xerox Multifunction Printer.

Attachment File Type: pdf, Multi-Page

Multifunction Printer Location: 6010 S Rainbow Blvd, Building A, Suite 2, Las Vegas, NV 89118

Device Name: WorkCentre® 5865 Las Vegas Investigations Office

For more information on Xerox products and solutions, please visit http://www.xerox.com

EXHIBIT 34

EXHIBIT 34

NEVADA STATE BOARD OF MEDICAL EXAMINERS

325 E. Warm Springs Road, Suite 225 Las Vegas, NV 89119

Rachakonda D. Prabhu, M.D.

Board President

Edward O. Cousineau, J.D. Executive Director



2nd Final Request

June 28, 2021

VIA FEDERAL EXPRESS

Tammy Hankins, PA-C 3753 Cherry Tree Blvd. Lake Havasu City

RE: BME CASE #: 20-19721 PATIENT: DOB: PATIENT: DOB: PATIENT: DOB: PATIENT: : DOB: PATIENT: : DOB: PATIENT: : DOB: PATIENT: ; DOB: PATIENT: DOB: PATIENT: : DOB: PATIENT: : DOB: PATIENT: · DOR· PATIENT: : DOB: PATIENT: ; DOB: PATIENT: DOB: PATEINT: DOB: PATEINT: DOB: PATIENT: : DOB: PATIENT: ; DOB: I PATIENT: : DOB: PATIENT: ; DOB: PATIENT: ; DOB: DOB: PATIENT: ; DOB: PATIENT: ; DOB: PATIENT: ; DOB: : DOB: : DOB:

Dear Ms. Hankins,

This is the 2ND final request for your reply regarding the patient's associated with this case. Please provide the requested reply to the allegations. You received an Order to reply with the letter dated December 15, 2020, but have not yet complied. Failure to comply with an Order of the Board constitutes grounds for initiating disciplinary action. NRS 630.3065. Failure to produce and make available health care records to an authorized representative or Investigator of the Board, as prescribed by Nevada law is also grounds for initiating disciplinary action or denial of licensure. NRS 629.061; 630.3062(4); 630.352. Please reply to this request within 5 calendar days.

Providing the requested information is deemed a professional obligation of any physician under investigation by the Board and shall not be deemed to be cooperation subject to the whistle-blower protections provided to physicians in NRS 630.364(3).

Enclosed is a copy of the original letter and Board Order to reply sent to you on December 15, 2020, the Second Request sent to you on January 29, 2021 and the 1st Final Request sent to you on February 22, 2021.

Should you have any questions you may contact me at (702) 486-3339.

Respectfully

Kim Friedman, CMBI

Sr. Investigator Las Vegas Office

The Investigative Committee of the Board of Medical Examiners of the State of Nevada

)	
)	Case No. 20-19721
)	
)	
))))

ORDER TO PRODUCE HEALTH CARE RECORDS

The Investigative Committee (IC) of the Board of Medical Examiners of the State of Nevada sends greetings to:

Tammy Hankins, PA-C 3753 Cherry Tree Blvd. Lake Havasu City, AZ 86406

Pursuant to the authority of Nevada Revised Statute (NRS) 630.311(1), the IC directs you to produce and deliver to the Nevada State Board of Medical Examiners, the materials as set forth in this Order:

1. A formal written response to the allegations regarding the letter dated December 17, 2020.

Said records shall be provided to an investigator of the Nevada State Board of Medical Examiners within 15 days of service of this Order (Investigation Division, ATTN: Kim Friedman, Nevada State Board of Medical Examiners, 6010 S. Rainbow Blvd., Bldg. A, Suite 2 Las Vegas, NV 89118). Failure to comply and produce said records in the aforesaid manner may subject you to potential disciplinary action, to include a violation of NRS 630.3065(2)(a) and NRS 630.3062(4); further, the Investigative Committee may seek administrative sanctions as set forth in NRS 630.352.

Additionally, compliance with this order is deemed compulsory and shall not be deemed to be cooperation subject to the protections provided to a physician pursuant to NRS 630.364(3).

Dated this 29th day of January, 2021.



Victor M. Muro, M.D., Chairman Nevada State Board of Medical Examiners Investigative Committee

Rev. 10-15-2020 NSBME 0375



TRACK ANOTHER SHIPMENT

774119391509

ADD NICKNAME



Delivered Thursday, July 1, 2021 at 12:22 pm



DELIVERED

Signature not required

GET STATUS UPDATES

OBTAIN PROOF OF DELIVERY

FROM

NEVADA STATE BOARD OF MED EXA Kim Friedman

> 325 E. Warm Springs Rd., Ste. 225 LAS VEGAS, NV US 89119 702-486-3339

TO

Tammy Hankins, PA-C Tammy Hankins, PA-C

3753 Cherry Tree Blvd. Lake Havasu City, AZ US 86406 520-240-5241

Travel History

TIME ZONE

Local Scan Time

Thursday, July 1, 2021

12:22 PM

Lake Havasu City, AZ

Delivered

Left at front door. Signature Service not requested.

7:16 AM

LAKE HAVASU CITY, AZ

On FedEx vehicle for delivery

6:49 AM

LAKE HAVASU CITY, AZ

At local FedEx facility

12:36 AM

PHOENIX, AZ

Departed FedEx location

Wednesday, June 30, 2021

8:50 AM

PHOENIX, AZ

Arrived at FedEx location

Tuesday, June 29, 2021

7/15/2021 Detailed Tracking

10:53 PM HENDERSON, NV Left FedEx origin facility

6:29 PM HENDERSON, NV Shipment exception

Barcode label unreadable and replaced

Monday, June 28, 2021

5:15 PM

1:36 PM HENDERSON, NV Picked up

HENDERSON, NV

12:15 PM Shipment information sent to FedEx

Shipment Facts

7/1/21 at 12:22 pm ③

TRACKING NUMBER SERVICE WEIGHT
774119391509 FedEx Ground 1 lbs / 0.45 kgs

DELIVERY ATTEMPTS TOTAL PIECES TERMS

1 Shipper

PACKAGING SHIP DATE STANDARD TRANSIT

Arrived at FedEx location

Package 6/28/21 ① 7/1/21 ②

ACTUAL DELIVERY



Shipment Receipt

Address Information

Ship to:

Ship from:

Tammy Hankins, PA-C

Kim Friedman

NEVADA STATE BOARD

OF MED EXA

3753 Cherry Tree Blvd.

325 E. Warm Springs Rd.,

Ste. 225

LAKE HAVASU CITY, AZ

LAS VEGAS, NV

86406

89119

US

US

5202405241

7024863339

Shipment Information:

Tracking no.: 774119391509

Ship date: 06/28/2021

Estimated shipping charges: 0.00

Package Information

Pricing option: FedEx Standard Rate

Service type: FedEx Ground Package type: Your Packaging

Number of packages: 1 Total weight: 1 LBS Declared Value: 0.00 USD

Special Services:

Pickup/Drop-off: pickup confirmation number: CPU909211791

Billing Information:

Bill transportation to: NEVADA STATE BOARD OF MED

EXA-877

Your reference:

P.O. no.:

Invoice no.:

Department no.:

Thank you for shipping online with FedEx ShipManager at fedex.com.

Please Note

FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1000, e.g., jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits; Consult the applicable FedEx Service Guide for details.

The estimated shipping charge may be different than the actual charges for your shipment. Differences may occur based on actual weight, dimensions, and other factors. Consult the applicable FedEx Service Guide or the FedEx Rate Sheets for details on how shipping charges are calculated.

EXHIBIT 35

EXHIBIT 35

	* * * * *	RECEIVED
In the Matter of the Investigation of:)	NUV 1 on.
)	NEVADA STATE BOARD OF MEDICAL EXAMPLERS
Tammy Hankins, PA-C)	-
I : N. DA 2077)	RECEIVED
License No. PA2277)	NOV 1 6 2020
	<i>,</i>	NEVADA STATE BOARD OF MEDICAL EXAMINERS

SUBPOENA DUCES TECUM

The Investigative Committee of the Board of Medical Examiners of the State of Nevada sends greetings to:

Vida Spa, LLC Or Authorized Representative 3255 S. Rainbow Blvd., #107 Las Vegas, NV 89146

Pursuant to the authority of NRS 630.140(1), WE COMMAND YOU, that all singular, business and excuses being set aside; you shall produce and deliver to the Nevada State Board of Medical Examiners, the materials as set forth in this Subpoena Duces Tecum:

- 1. Properly authenticated and complete copies of any and all patient records, for any and all patients of Tammy Hankins, PA-C.
- 2. Properly authenticated and complete copies of any and all patient records, for any and all patients of Simja Levy, PA-C.
- 3. Properly authenticated and complete copies of any and all patient records, for any and all patients of Sherman Washington, M.D.
- 4. Properly authenticated and complete copies of any and all contracts, agreement, employment and/or subcontractor agreements between Vida Spa, LLC and Simja Levy, PA-C.

5. Properly authenticated and complete copies of any and all contracts, agreements, Medical Director contracts, employment and/or subcontractor agreements between Vida Spa, LLC and Maryanne Phillips, M.D.

Said records shall be provided to an investigator of the Nevada State Board of Medical Examiners <u>within 10 days of service</u> of this subpoena delivered to The Nevada

State Board of Medical Examiners located at 6010 S. Rainbow Blvd. Bldg. A Suite 2, Las Vegas, NV 89118. Failure to comply and produce said records in the aforesaid manner may subject you to possible disciplinary action, to include NRS 630.3065(2)(a); further the Investigative Committee may seek relief as provided in NRS 630.140(3).

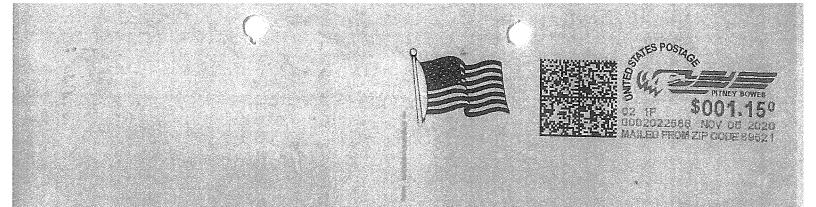
Additionally, compliance with this subpoena is deemed compulsory and shall not be deemed to be cooperation subject to the protections provided to a physician pursuant to NRS 630.364(3).

Dated this 5th day of November, 2020.

NEVADA STATE BOARD OF MEDICAL EXAMINERS INVESTIGATIVE COMMITTEE

Victor M. Muro, M.D., Chairman

Nevada State Board of Medical Examiners
Investigative Committee



Vida Spa, LLC Or Authorized Representative 3255 S. Rainbow Blvd., #107 Las Vegas, NV 89146

Nevada State Board of Medical Examiners

Affidavit of Service

- I, Kim Friedman, Sr. Investigator for the Nevada State Board of Medical Examiners, received the following documents on November 5, 2020, for personal service on Vida Spa LLC.
 - 1. ____Complaint and Notice of Hearing and Pre Hearing
 - 2. Summary Suspension
 - 3. Order for Substance Abuse Evaluation
 - 4. X Subpoena Duces Tecum

I was unable to serve process personally on respondent, but mailed a copy via USPS to Vida Spa, LLC located at 3255 S. Rainbow Blvd., #107, Las Vegas, NV 89146 on November 5, 2020.

Signed this 13th day of September, 2021.

Under Penalty of Perjury:

Kimberly Friedman

COUNTY OF CLARK STATE OF NEVADA

SUBSCRIBED and SWORN to before me This 13th day of September, 2021.

Notary Public



EXHIBIT 36

EXHIBIT 36

Before the Board of Medical Examiners of the State of Nevada 1 **Investigative Committee** 2 3 * * * * * 4 In the Matter of the Investigation of: 5 6 Case No. 20-19721 Tammy Hankins, PA-C 7 8 License No. PA2277 9 10 SUBPOENA DUCES TECUM 11 12 The Investigative Committee of the Board of Medical Examiners of the State of Nevada sends 13 greetings to: 14 Vida Spa, LLC 15 Or Authorized Representative 3255 S. Rainbow Blvd., #107 16 Las Vegas, NV 89146 17 authority of Nevada Revised Statutes (NRS) 630.140(1), Pursuant the 18 WE COMMAND YOU, that all singular, business and excuses being set aside; that you shall 19 produce and deliver to the Nevada State Board of Medical Examiners, the materials as set forth in 20 this Subpoena Duces Tecum as described below: 21 22 1. Properly authenticated and complete copies of any and all audio/video recordings, as 23 well as photographs, for any and all procedures performed by Tammy Hankins, PA-C 24 at Vida Spa LLC, located at 3255 S. Rainbow Blvd., #107 Las Vegas, NV 89146 for 25 any and all patients treated from January 1, 2019, through present. 26 2. Properly authenticated and complete copies of any and all patient records, for any and 27 all patients treated by Tammy Hankins, PA-C from January 1, 2019 through March 6, 28

2020.

Rev. 10-15-2020

1	3. Properly authenticated and complete copies of any and all patient names, DOB's and
2	treatments received, not including facials, microdermabrasion, laser hair removal or
3	photofacials, for all patients of Vida Spa from January 1, 2019, through current.
4	All of these records shall be forwarded to the Investigation Division, Attn: Kim Friedman,
5	Sr. Investigator Nevada State Board of Medical Examiners, 6010 S. Rainbow Blvd., Bld. A, Ste. 2
6	Las Vegas, NV 89118, within ten (10) days from the date of service of this subpoena. Failure to
7	comply and produce said records at the aforesaid time and place may cause the Investigative
8	Committee to seek judicial relief and/or assistance as provided in NRS 630.140(2), (3) & (4).
9	Dated this 3rd day of December, 2020
10	NEVADA STATE BOARD OF MEDICAL EXAMINERS
11	
12	
13	- 1/m mun) Mo
14	Victor M. Muro, M.D., Chairman Nevada State Board of Medical Examiners
15	Investigative Committee
16	///
17	
18	
19	NEVADA RULES OF CIVIL PROCEDURE, RULE 45(c) AND 45(d)
20	
21	(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENA.
22	(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court
23	on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a
24	reasonable attorney's fee. (2)(A) A person commanded to produce and permit inspection and copying of designated books,
25	papers, documents or tangible things, or inspection of premises need not appear in person at the place of
26	production or inspection unless commanded to appear for deposition, hearing or trial. (B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit
27	inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the
28	subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued.

Rev. 10-15-2020

If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

- (3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it
 - (i) fails to allow reasonable time for compliance;
 - (ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or
 - (iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
 - (iv) subjects a person to undue burden.
 - (B) If a subpoena
 - (i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or
 - (ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

- (1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.
- (2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.



Vida Spa, LLC Or Authorized Representative 3255 S. Rainbow Blvd., #107 Las Vegas, NV 89146

Nevada State Board of Medical Examiners

Affidavit of Service

I, Kim Friedman, Sr. Investigator for the Nevada State Board of Medical Examiners, received the following documents on December 3, 2020, for personal service on Vida Spa LLC.

- 1. ____Complaint and Notice of Hearing and Pre Hearing
- 2. ___Summary Suspension
- 3. ____ Order for Substance Abuse Evaluation
- 4. X Subpoena Duces Tecum

I was unable to serve process personally on respondent, but mailed a copy via USPS to Vida Spa, LLC located at 3255 S. Rainbow Blvd., #107, Las Vegas, NV 89146 on December 3, 2020.

Signed this 13th day of September, 2021. Under Penalty of Perjury:

Litter

riedman

Kimberly 7

COUNTY OF CLARK STATE OF NEVADA

SUBSCRIBED and SWORN to before me This 13th day of September, 2021.

Notary Public

EXHIBIT 37

EXHIBIT 37

	D. A. D. J. 435 H. J.		
1	Before the Board of Medical Examiners of the State of Nevada		
2	Investigati	ve Committee	
3	* * * * *		
4 5 6	In the Matter of the Investigation of:))	
7	Tammy Hankins, PA-C) Case No. 20-19721	
8 9	License No. PA2277)))	
10	SUBPOENA	DUCES TECUM	
11	The Investigative Committee of the Board of Medical Examiners of the State of Nevada sends		
12	greetings to:		
13	Vida Spa, LLC		
14 15	Or Authorized Representative 3255 S. Rainbow Blvd., #107 Las Vegas, NV 89146		
16	Pursuant to the authority of NRS 630.140(1), WE COMMAND YOU, that all singular,		
17	business and excuses being set aside; you shall produce and deliver to the Nevada State Board of		
18	Medical Examiners, the materials as set forth in	this Subpoena Duces Tecum:	
19	1. <u>Properly authenticated and com</u>	plete copies of any and all health care records, to	
20	include billing records, of		
21	2. <u>Properly authenticated and com</u>	plete copies of any and all health care records, to	
22	include billing records, of		
23	3. <u>Properly authenticated and com</u>	plete copies of any and all health care records, to	
24	include billing records, of	<u>.</u>	
25	4. <u>Properly authenticated and com</u>	plete copies of any and all health care records, to	
26	include billing records, of	<u>.</u>	
27	5. <u>Properly authenticated and com</u>	plete copies of any and all health care records, to	
28	include billing records, of	<u>.</u>	

1	6.	Properly authenticated and complete copies of any and all health care records, to
2		include billing records, of
3	7.	Properly authenticated and complete copies of any and all health care records, to
4		include billing records, of
5	8.	Properly authenticated and complete copies of any and all health care records, to
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7	9.	. Properly authenticated and complete copies of any and all health care records, to
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9	10.	Properly authenticated and complete copies of any and all health care records, to
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11	11.	Properly authenticated and complete copies of any and all health care records, to
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13	12.	Properly authenticated and complete copies of any and all health care records, to
14		include billing records, of
15	13.	Properly authenticated and complete copies of any and all health care records, to
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19	15.	Properly authenticated and complete copies of any and all health care records, to
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21	16.	Properly authenticated and complete copies of any and all health care records, to
22		include billing records, of
23	17.	Properly authenticated and complete copies of any and all health care records, to
24		include billing records, of
25	18.	Properly authenticated and complete copies of any and all health care records, to
26		include billing records, of
27	19.	Properly authenticated and complete copies of any and all health care records, to
28		include billing records, of

1	20.	Properly authenticated and complete copies of any and all health care records, to
2		include billing records, of
3	21.	Properly authenticated and complete copies of any and all health care records, to
4		include billing records, of
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17	84.	Properly authenticated and complete copies of any and all patient names and DOB's
18		for any and all patients treated, and/or prescribed to, by Cornell Calinescu, M.D.
19	Said 1	ecords shall be provided to an investigator of the Nevada State Board of Medica
20	Examiners wi	thin 5 days of service of this subpoena delivered to The Nevada
21	State Board	of Medical Examiners located at 325 E. Warm Springs Road, Suite 225, Las Vegas
22	NV 89119. F	failure to comply and produce said records in the aforesaid manner may subject you to
23	possible disci	iplinary action, to include NRS 630.3065(2)(a); further the Investigative Committee
24	may seek relie	ef as provided in NRS 630.140(3).
25	Additi	onally, compliance with this subpoena is deemed compulsory and shall not be deemed
26	to be coopera	tion subject to the protections provided to a physician pursuant to NRS 630.364(3).
27	Dated	this 7 th day of May, 2021.
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NEVADA STATE BOARD OF MEDICAL EXAMINERS INVESTIGATIVE COMMITTEE Victor M. Muro, M.D., Chairman Nevada State Board of Medical Examiners Investigative Committee // // //

NEVADA RULES OF CIVIL PROCEDURE, RULE 45(c) AND 45(d)

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENA.

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- (1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.
- (2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.
- (B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.
- (3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it
 - (i) fails to allow reasonable time for compliance;
 - (ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or
 - (iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
 - (iv) subjects a person to undue burden.
 - (B) If a subpoena
 - (i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or
 - (ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, the court may, to protect a person subject to or affected by the subpoena, quash

or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

- (1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.
- (2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

Nevada State Board of Medical Examiners

Affidavit of Service

I, Kim Friedman, Sr. Investigator for the Nevada State Board of Medical Examiners, received the following documents on May 7, 2021, for personal service on Vida Spa LLC.

- 1. Complaint and Notice of Hearing and Pre Hearing
- 2. Summary Suspension
- 3. ___ Order for Substance Abuse Evaluation
- 4. X Subpoena Duces Tecum

I was able to serve process personally on respondent, by hand delivering a copy of the above document, on May 7, 2021, to Gisselle Platfoot at Vida Spa, LLC located at 3255 S. Rainbow Blvd., #107, Las Vegas, NV 89146.

Signed this 13th day of September, 2021.

Under Penalty of Perjury:

Kimberly\Friedman

COUNTY OF CLARK STATE OF NEVADA

SUBSCRIBED and SWORN to before me This 13th day of September, 2021.

Notary Public

EXHIBITS 38-58 VIDEO LINKS

EXHIBIT 38	VIDA SPA VIDEO 1
EXHIBIT 39	VIDA SPA VIDEO 2
EXHIBIT 40	VIDA SPA VIDEO 3
EXHIBIT 41	VIDA SPA VIDEO 4
EXHIBIT 42	VIDA SPA VIDEO 5
EXHIBIT 43	VIDA SPA VIDEO 6
EXHIBIT 44	VIDA SPA VIDEO 7
EXHIBIT 45	VIDA SPA VIDEO 8
EXHIBIT 46	VIDA SPA VIDEO 9
EXHIBIT 47	VIDA SPA VIDEO 10
EXHIBIT 48	VIDA SPA VIDEO 11
EXHIBIT 49	VIDA SPA VIDEO 12
EXHIBIT 50	VIDA SPA VIDEO 13
EXHIBIT 51	VIDA SPA VIDEO 14
EXHIBIT 52	VIDA SPA VIDEO 15
EXHIBIT 53	VIDA SPA VIDEO 16
EXHIBIT 54	VIDA SPA VIDEO 17
EXHIBIT 55	VIDA SPA VIDEO 18
EXHIBIT 56	VIDA SPA VIDEO 19
EXHIBIT 57	VIDA SPA VIDEO 20
EXHIBIT 58	VIDA SPA VIDEO 21

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

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In the Matter of Charges and Complaint

Against: 6

TAMMY LYNN HANKINS, PA-C,

Respondent.

Case No. 21-51633-1

FILED

JUN 2 5 2021

NEVADA STATE BOARD OF

COMPLAINT

The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners (Board), by and through Aaron Bart Fricke, J.D., General Counsel and attorney for the IC, having a reasonable basis to believe that Tammy Lynn Hankins, PA-C, (Respondent) violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act), hereby issues its Complaint, stating the IC's charges and allegations as follows:

RESPONDENT'S HISTORY OF CRIMINAL AND UNPROFESSIONAL CONDUCT

1. On or about March 1, 2012, in the Superior Court of the State of Arizona, in and for the County of Mohave (Arizona Court), in Case No. CR-2012-00287, a Grand Jury indicted Respondent on five (5) criminal counts of violations of Arizona law, including COUNT 1: FRAUDULENT SCHEMES AND ARTIFICES, CLASS 2 FELONY; COUNT 2: OBTAIN OR PROCURE THE ADMINISTRATION OF A NARCOTIC DRUG BY FRAUD, CLASS 3 FELONY; COUNT 3: OBTAINING A DANGEROUS DRUG BY FRAUD, CLASS 3 FELONY; COUNT 4: ATTEMPTED OBTAINING A DANGEROUS DRUG BY FRAUD, CLASS 4 FELONY; COUNT 5: ATTEMPTED OBTAINING A DANGEROUS DRUG BY FRAUD, CLASS 4 FELONY.

¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal Complaint was authorized for filing, was composed of Board members Victor M. Muro, M.D., Chair, Ms. April Mastroluca and Weldon Havins, M.D., J.D.

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Arizona Case History

2. On or about November 28, 2012, the Arizona Regulatory Board of Physician Assistants ("Arizona Board"), in Case No. PA-11-0127A, found Respondent, who had been the holder of a license to practice medicine as a physician assistant in the State of Arizona (License No. 2228), guilty of unprofessional conduct. Specifically, the Arizona Board had received information from a pharmacist alleging that Respondent had been recklessly writing prescriptions without supervision, writing abnormally large quantities of controlled drugs, and writing outside her scope of practice. Further, Respondent's supervising physician (SP) had terminated the supervision relationship with Respondent on September 13, 2011, yet Respondent proceeded to perform healthcare tasks without an SP's direction or supervision from September 13, 2011, through October 25, 2011, according to the date of the last prescribed controlled substance on the Pharmacy Monitoring Profile (which is a similar database in the State of Arizona to the Nevada Prescription Monitoring Program). On October 26, 2011, Respondent wrote two (2) prescriptions for controlled substances on a prescription pad that contained her SP's, name and DEA number. The prescriptions were issued after the SP terminated his supervisory relationship with Respondent. Arizona Board staff determined that the prescription pads did not contain Respondent's current SP information. In addition, Respondent failed to timely appear for an investigational interview with Arizona Board staff to address the quality of care issues in this case on four (4) occasions. Arizona Board staff found that Respondent failed to cooperate with the Arizona Board's investigation. A Medical Consultant (MC) reviewed the medical records of certain patients treated by Respondent to determine the quality of care provided by Respondent.

Patient JC

3. Respondent treated Patient JC for weight loss and removal of skin lesions, and Respondent started the patient on Levoxyl and Prozac. Patient JC continued to be seen by Respondent for chronic pain, and received prescriptions for Phentermine, Vicodin, Valium, Xanax and Oxycodone during the course of treatment with Respondent. Patient JC's prescriptions were reportedly stolen in March 2011. Patient JC later underwent Fraxel treatment along with Mesotherapy that reportedly required continuation of her pain medications. By October 2011,

Patient JC had not established herself with a pain specialist and again claimed that her prescriptions were stolen.

Patient MW

4. Another patient, Patient MW, received medical care in Respondent's office for a Fraxel treatment on August 23, 2011. There is no record of prescriptions written for this patient in the chart provided. Lastly, a police report made by Respondent's former SP alleged that Respondent had written thirty-nine (39) prescriptions for Patient MW between June and September of 2011, including Oxycodone, Hydrocodone, Valium, Phentermine, Xanax, and Endocet. In particular, Respondent wrote a prescription for Oxycodone 5 mg, 100 ct., and Diazepam 10 mg, 100 ct., with five refills on June 20, 2011. The record of all pharmacy prescriptions written by Respondent from November 2010 to November 2011 includes over 900 prescriptions, approximately 99% of which written by Respondent during this time period were for Phentermine, Diazepam, Alprazolam,. Hydrocodone, Oxycodone, Endocet and Carisoprodol. Of particular concern to the care of Patient MW were prescriptions for Hydrocodone-acetaminophen 7.5-750 mg, 100 ct., with five (5) refills, and prescriptions for Oxycodone-acetaminophen 10-325 mg, 100 ct., Alprazolam 1 mg, 90 ct., with two (2) refills, and Meperidine 50 mg., 40 ct., on January 18, 2011.

Arizona Board Discipline

- 5. The Arizona Board determined that the standard of care when prescribing medications for patients requires documentation of the medications prescribed, indications for use and monitoring of the amounts being prescribed and noted in the medical record. The Arizona Board determined that Respondent deviated from the standard of care by inappropriately prescribing medications for patients, and that the excess prescribing of these medications can lead to addiction or overdose with a possible fatal outcome.
- 6. For the foregoing misconduct, the Arizona Board found Respondent guilty of unprofessional conduct pursuant to Arizona Revised Statute (ARS) §32-2501(18)(i) ("prescribing or dispensing controlled substances or prescription-only drugs for which the physician assistant is not approved or in excess of the amount authorized pursuant to this chapter"); ARS §32-2501(18)(j) ("any conduct or practice that is or might be harmful or dangerous to the health of a patient or the

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public"); ARS § 32-2501 (18)(p) ("failing or refusing to maintain adequate records on a patient"), and ARS § 32-2501(18)(z) ("failing to furnish legally requested information to the [Arizona Board] or its Investigator in a timely manner."). The Arizona Board also found that a practice restriction was needed in order to protect the public, and ordered that Respondent be issued a Letter of Reprimand, placed on probation for one (1) year with additional conditions and restrictions.

Respondent's Arizona License Renewal

7. Respondent's license to practice medicine as a physician assistant in the State of Arizona (License No. 2228) was due for renewal by June 1, 2013; Respondent did not renew, and her Arizona license expired by operation of law on May 20, 2014.

Criminal Conduct by Respondent in Arizona

- 8. On or about September 14, 2013, the Arizona Court found that Respondent had knowingly, intelligently and voluntarily pled guilty to the offense of: COUNT 3: OBTAINING A DANGEROUS DRUG BY FRAUD, CLASS 3 FELONY. On or about October 2, 2013, the Arizona Court entered its judgment finding Respondent guilty of the foregoing charge, and sentenced Respondent to a suspended imposition of sentence and placing the Defendant on probation for a period of four years commencing October 2, 2013, among other conditions of probation.
- 9. On or about January 17, 2014, pursuant to a Petition to Revoke Probation, the Arizona Court ordered that Respondent be held without bond pending hearing on said petition.
- 10. On or about August 11, 2014, the Arizona Court found Respondent guilty of violating her probation for the following crimes: OBTAINING A DANGEROUS DRUG BY FRAUD, CLASS 3 FELONY, and SEXUAL CONDUCT WITH A MINOR, CLASS 6 FELONY. For the first crime, Respondent was sentenced to two and one-half years with the Arizona Department of Corrections, as a minimum sentence, to date from August 11, 2014, and was given credit for two hundred eight (208) days served prior to sentencing. For the second crime, Respondent as sentenced to one (1) additional year of incarceration, that sentence to run consecutive to the other.

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Respondent's Application for a Physician Assistant License in the State of Nevada

- 11. On or about September 24, 2019, Respondent applied to the Board for a license to practice medicine as a physician assistant in the State of Nevada. On March 6, 2020, the Board met for its regularly scheduled public meeting, and considered Respondent's application in open session, at which time, Respondent informed the Board that she had not practiced clinical medicine since she had been incarcerated, and stated that, though she had secured a job at a medical spa, and planned in the future to perform plastic surgery injections, in-office procedures, excisions, and assisting with different procedures, nevertheless, she had not done so yet and the aforementioned job offer was contingent upon her obtaining a license in Nevada. At the meeting, individual Board members expressed concerns regarding her history of criminal and unprofessional conduct, and concerns about the fact that Respondent had not practiced clinical medicine since her incarceration. Nevertheless, considering that Respondent had recently recertified as a physician assistant with National Commission on Certification of Physician Assistants, which demonstrated to some extent her current clinical competency, the Board approved her application and granted her a license to practice medicine.
- 12. The Board issued to Respondent an active license to practice medicine as a physician assistant in the State of Nevada (License No. PA2277) on March 6, 2020.
- 13. Respondent was not licensed to practice medicine as a physician assistant in the State of Nevada before March 6, 2020.
- 14. Respondent does not hold an active Drug Enforcement Agency (DEA) registration, and has not held a valid registration since 2016. Respondent also does not hold and has never held an active license or registration with the Nevada State Board of Pharmacy (NSBOP).

II. STATEMENT OF LAW

- 15. Pursuant to NRS 630.020(1)-(4), the "Practice of medicine" means:
 - To diagnose, treat, correct, prevent or prescribe for any human disease, ailment, injury, infirmity, deformity or other condition. physical or mental, by any means or instrumentality, including, but not limited to, the performance of an autopsy.
 - To apply principles or techniques of medical science in the diagnosis or the prevention of any such conditions.

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- To perform any of the acts described in subsections 1 and 2 by using equipment that transfers information concerning the medical condition of the patient electronically, telephonically or by fiber optics, including, without limitation, through telehealth, from within or outside this State or the United States.
- To offer, undertake, attempt to do or hold oneself out as able to do any of the acts described in subsections 1 and 2.
- NRS 630.400(1)(d) provides that it is unlawful to practice medicine without being 16. licensed under NRS Chapter 630.
- Pursuant to NRS 630.400(2) and NRS 193.130(c) and (d), the unlawful practice of 17. medicine is a felony, punishable by imprisonment in the state prison for a minimum term of not less than one (1) year and a maximum term of not more than five (5) years.
- 18. NAC 630.380(1)(m) provides that violating any provision of NRS 630.301 to 630.3065, is grounds for initiating disciplinary action against a physician assistant.
- NAC 630.380(1)(f) provides that malpractice in the performance of medical 19. services is grounds for initiating disciplinary action against a physician assistant.
- NRS 630.301(4) provides that malpractice is grounds for initiating disciplinary 20. action against a physician.
- Pursuant to NAC 630.375(2) a physician assistant shall not perform medical 21. services without supervision from his or her supervising physician, except in life-threatening and emergency situations.
- 22. Pursuant to NAC 630.370, a supervising physician is responsible for all the medical activities of his or her physician assistant and shall ensure, among other obligations, that the physician assistant performs only those medical services which have been approved by his or her supervising physician, there is strict compliance with the regulations of the State Board of Pharmacy regarding controlled substances, poisons, dangerous drugs or devices, and that the supervising physician is available at all times that his or her physician assistant is performing medical services to consult with his or her assistant.

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- Pursuant to NAC 630.380(1)(a), willfully and intentionally making a false or 23. fraudulent statement in applying for a license is grounds for initiating disciplinary action against a physician assistant.
- 24. Pursuant to NAC 630.380(1)(a), performing medical services otherwise than in a life-threatening or emergency situation, and at the direction or under the supervision of the supervising physician of the physician assistant is grounds for initiating disciplinary action against a physician assistant.
- Pursuant to NRS 630.3065(2)(c), knowingly or willfully failing to comply with or 25. provision of NRS Chapter 630 is grounds for initiating disciplinary action against a physician.
- NAC 630.040 defines malpractice as "the failure of a physician, in treating a 26. patient, to use the reasonable care, skill, or knowledge ordinarily used under similar circumstances."
- 27. Pursuant to 21 Code of Federal Regulations (CFR) §1306.04(a)-(b) and 453.381, a physician or physician assistant may prescribe or administer controlled substances only for a legitimate medical purpose and in the usual course of his or her professional practice. The responsibility for the proper prescribing and dispensing of controlled substances is upon the prescribing practitioner, and a prescription may not be issued in order for an individual practitioner to obtain controlled substances for supplying the individual practitioner for the purpose of general dispensing to patients. 21 CFR §1306.04(a)-(b).
- 28. Pursuant to NRS 630.3062(1)(h), fraudulent, illegal, unauthorized or otherwise inappropriate prescribing, administering or dispensing of a controlled substance listed in schedule II, III or IV is grounds for initiating disciplinary action or denying licensure.
- Pursuant to NRS 449.442(1)-(2), an office of a physician or a facility that provides 29. health care, other than a medical facility (as specifically defined in NRS 449.0151), must obtain a permit pursuant to NRS 449.443 from the Nevada State Board of Health, and must maintain current accreditation by a nationally recognized organization approved by the Nevada State Board of Health, before offering to a patient a service of general anesthesia, conscious sedation or deep sedation.

30. Pursuant to NRS 630.306(1)(o), failure to comply with the requirements of NRS 630.373 is grounds for initiating discipline or denying licensure.

- 31. Pursuant to NRS 630.373(1), a physician shall not administer or supervise directly the administration of general anesthesia, conscious sedation or deep sedation to patients unless the general anesthesia, conscious sedation or deep sedation is administered: (a) in an office of a physician or osteopathic physician which holds a permit pursuant to NRS 449.435 to 449.448, inclusive; (b) in a facility which holds a permit pursuant to NRS 449.435 to 449.448, inclusive; (c) in a medical facility as that term is defined in NRS 449.0151; or (d) outside of the State of Nevada.
- 32. For the purposes of NRS 630.373, "conscious sedation" means a minimally depressed level of consciousness, produced by a pharmacologic or nonpharmacologic method, or a combination thereof, in which the patient retains the ability independently and continuously to maintain an airway and to respond appropriately to physical stimulation and verbal commands. NRS 449.436.
- 33. Pursuant to NRS 453.021, "administer" means the direct application of a controlled substance, whether by injection, inhalation, ingestion or any other means, to the body of a patient or research subject by: (1) a practitioner or, in the practitioner's presence, by the practitioner's authorized agent; or (2) the patient or research subject at the direction and in the presence of the practitioner.
- 34. Pursuant to NRS 454.217, a person shall not inject a neuromodulator that is derived from Clostridium botulinum or is biosimilar to or the bioequivalent of such a neuromodulator unless (1) the person is a physician or physician assistant licensed pursuant to NRS Chapter 630, a qualified dentist licensed pursuant to NRS 631.391, a registered nurse or advanced practice registered nurse, a physician or physician assistant licensed pursuant to NRS Chapter 633, or a qualified podiatric physician to NRS 635.086, (2) it is within his or her scope of practice, and (3) the injection occurs at a location that is either a medical facility, as defined in NRS 449.0151, or at the office of a physician or physician assistant licensed pursuant to chapter 630 or 633 of NRS, dentist, advanced practice registered nurse or podiatric physician.

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35. A person who violates any portion of NRS 454.217 is guilty of a misdemeanor. NRS 454.356

- 36. Pursuant to NRS 629.086, a person shall not inject dermal or soft tissue fillers unless (1) the person is a physician or physician assistant licensed pursuant to NRS Chapter 630, a qualified dentist licensed pursuant to NRS 631.391, a registered nurse or advanced practice registered nurse, a physician or physician assistant licensed pursuant to NRS Chapter 633, or a qualified podiatric physician to NRS 635.086, (2) it is within his or her scope of practice, and (3) the injection occurs at a location that is either a medical facility, as defined in NRS 449.0151, or at the office of a physician or physician assistant licensed pursuant to chapter 630 or 633 of NRS, dentist, advanced practice registered nurse or podiatric physician.
- 37. A person who violates any portion of NRS 629.086 is guilty of a misdemeanor. NRS 629.086(3).
- Pursuant to NRS 630.306(1)(u), the failure to comply with the provisions of 38. NRS 454.217 or 629.086 is grounds for initiating disciplinary action against a physician.
- NAC 630.301(9) provides that engaging in conduct that brings the medical 39. profession into disrepute is grounds for initiating disciplinary action against a physician assistant.

III. RESPONDENT'S UNLICENSED PRACTICE OF MEDICINE AT VIDA SPA. PRACTICE, DISREPUTABLE CONDUCT AND RELATED VIOLATIONS OF THE NEVADA MEDICAL PRACTICE ACT.

- 40. Vida Spa LLC, a Nevada Limited Liability Company, formed July 22, 2016, managed by Gisselle Platfoot ("Vida Spa"), and also doing business as "Vida Spa" and "Vita Medical Spa Las Vegas," is a self-described "medical spa" located at 3225 S Rainbow Blvd #107 and/or #206, Las Vegas, NV 89146.
- 41. Vida Spa LLC, is licensed in Clark County, Nevada, under Clark County Business License No. 2003447.081-172, under the business category of "Cosmetology Establishment -Other Services." The owners listed under this license are Art Matrix, Inc. and Gisselle Platfoot.
- 42. Gisselle Platfoot, manager of Vida Spa LLC, at all times relevant to this complaint, did not hold a license to practice any healing art as a "provider of health care," as defined in NRS 629.031, from any occupational licensing board in the State of Nevada.

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- 43. Vida Spa is "a facility that provides health care, other than a medical facility" (NRS 449.442). Neither Respondent, Vida Spa, nor Gisselle Platfoot held, or currently holds, the requisite permit, pursuant to NRS 449.442, to perform general anesthesia, conscious sedation or deep sedation. Additionally neither Respondent, Vida Spa, nor Gisselle Platfoot held a current accreditation by a nationally recognized organization approved by the Nevada State Board of Health.
- 44. At all times relevant to this Complaint, Vida Spa was not a "medical facility," as defined in NRS 449.0151, and not "the office" of a physician or physician assistant licensed pursuant to NRS chapter 630 or 633, qualified dentist, advanced practice registered nurse or podiatric physician, as provided in NRS 454.217.
- 45. On March 24, 2021, the NSBOP issued a Citation and Order to Cease and Desist (Platfoot Citation) to Vida Spa LLC and Gisselle Platfoot, whereby the NSBOP determined that Vida Spa LLC and Gisselle Platfoot were possessing, administering, prescribing and/or dispensing controlled substances and/or dangerous drugs for Nevada patients from Vida Spa in violation of federal and state law. Specifically, the Platfoot Citation states that Vida Spa and Gisselle Platfoot did not have a dispensing registration and are therefore prohibited from possessing, dispensing and/or administering controlled substances and/or dangerous drugs. The Platfoot Citation finds that Vida Spa and Gisselle Platfoot violated, attempted to violate, assisted or abetted in the violation of or conspired to violate, without limitation, NRS 453.226, NRS 453.316, NRS 453.321(1)(a), NRS 453.331 (l)(c)(d)(t)&(i), NRS 453.381(1), NRS 453.401(l)(a), NRS 639.0727, NRS 639.100(1), NRS 639.23505, NRS 639.281, NRS 639.2813, NRS 639.310, NAC 639.742, 21 U.S.C. § 822(a)(2), 21 U.S.C. § 823(f), 21 U.S.C. § 84l(a), 21 U.S.C. § 842(a), 21 U.S.C. § 846 and 21 CFR §§ 1306.03-1306.05. The Platfoot Citation orders Vida Spa LLC and Gisselle Platfoot, pursuant to NRS 639.2895(1), to immediately cease and desist possessing, administering, prescribing and/or dispensing controlled substances for Nevada patients, and also assessed an administrative fine of five thousand dollars (\$5,000.00) pursuant to NRS 639.2895(3).

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A. Respondent's Treatment of Patient A Without a License

- 46. Patient A² was a fifty-seven (57) year-old female at the time of the events at issue.
- 47. At all times relevant to Respondent's treatment of Patient A, the so-called "medical director" of Vida Spa was Sherman Washington, Jr., M.D.
- 48. On October 9, 2019, Respondent, who did not have her own DEA registration and controlled substance license issued by the NSBOP, utilized the prescribing credentials of Sherman Washington, Jr., M.D., to issue fraudulent prescriptions to Patient A for Tramadol (a Schedule IV Controlled Substance) 50 mg tablets, 24 ct. for 3 days, and Diazepam (a Schedule IV Controlled Substance) 10 mg tablets, 8 ct. for 3 days; these prescriptions were called-in to the pharmacy by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and the prescriptions were filled the same day.
- 49. Respondent instructed Patient A to take Schedule IV controlled substances in a manner that materially deviated from the issued prescriptions; Respondent instructed Patient A to take Tramadol 50mg, 2 tablets, and Diazepam 10 mg, 1 tablet, at 2:00 p.m., on October 10, 2019, for the purpose of conscious sedation for an invasive, surgical liposuction procedure Respondent planned to perform on Patient A at Vida Spa at 3:00 p.m. that day.
- Patient A to deviate from the issued prescription in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal a violation by Vida Spa of NRS 449.442(1)-(2).
- 51. Dr. Washington did not see or treat Patient A, did not direct or supervise Respondent in her treatment of Patient A, and did not specifically direct Respondent to issue prescriptions to Patient A.
- 52. On October 10, 2019, at Vida Spa, at approximately 3:00 p.m., Respondent performed a liposuction procedure on the arms of Patient A. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient A, which Respondent obtained, without a

² Patient A's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint, along with identifying information for all other patients B through L referered to herein.

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patient-specific prescription or an order from a licensed practitioner for Patient A, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.

Respondent was not supervised by any licensed physician while performing this 53. invasive surgical procedure on Patient A at Vida Spa.

COUNT I

NRS 630.400(1) - Unlicensed Practice of Medicine

- All of the allegations contained in the above paragraphs are hereby incorporated by 54. reference as though fully set forth herein.
- 55. Respondent practiced medicine without a license when she treated Patient A on October 9 and 10, 2019.
- 56. Respondent, having been previously disciplined by the Arizona Board and incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by her subsequent application to the Board for a license to practice medicine in the State of Nevada, among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.
- By reason of the foregoing, Respondent is subject to discipline by the Board as 57. provided in NRS 630.352.

COUNT II

NRS 630.301(4) - Malpractice

- 58. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- As demonstrated by, but not limited to, the above-outlined facts, Respondent 59. committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient A, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient A without first obtaining a license to practice medicine in the State of Nevada, by performing an

invasive surgical procedure on Patient A, by administering tumescent anesthesia to Patient A utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, by issuing fraudulent and illegal prescriptions for controlled substances to Patient A, by instructing Patient A to take controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2), and by treating Patient A without the direct supervision of a licensed physician.

60. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT III

NRS 630.3062(1)(h) – Fraudulent, Illegal, Unauthorized and Otherwise Inappropriate Prescribing of Schedule IV Controlled Substance

- 61. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 62. As demonstrated by, but not limited to, the above-outlined facts, Respondent issued fraudulent, illegal, unauthorized and otherwise inappropriate prescriptions for Schedule IV controlled substances, Tramadol and Diazepam, to Patient A by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient A without first obtaining a license to practice medicine in the State of Nevada, a DEA registration, and a controlled substance license issued by the NSBOP, by issuing fraudulent and illegal prescriptions for these controlled substances to Patient A, by instructing Patient A to take these controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2).
- 63. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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COUNT IV

NRS 630.301(9) - Disreputable Conduct

- All of the allegations contained in the above paragraphs are hereby incorporated by 64. reference as though fully set forth herein.
- Respondent engaged in conduct that brings the medical profession into disrepute 65. by, among other misconduct, knowingly, willfully and feloniously practicing medicine without first obtaining a license to practice medicine in the State of Nevada, by performing an invasive surgical procedure on Patient A, by administering tumescent anesthesia to Patient A utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, by issuing fraudulent and illegal prescriptions for Schedule IV controlled substances to Patient A, by instructing Patient A to take these controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2), and by treating Patient A without the direct supervision of a licensed physician.
- 66. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

Respondent's Treatment of Patient B Without a License В.

- 67. Patient B was a thirty-one (31) year-old female at the time of the events at issue.
- 68. At all times relevant to Respondent's treatment of Patient B, the so-called "medical director" of Vida Spa was Sherman Washington, Jr., M.D.
- On October 7, 2019, Respondent, who did not have her own DEA registration and 69. controlled substance license issued by the NSBOP, utilized the prescribing credentials of Sherman Washington, Jr., M.D., to issue fraudulent prescriptions to Patient B for Tramadol 50 mg tablets (a Schedule IV Controlled Substance), 20 ct. for 3 days, Promethazine 25 mg tablets, 12 ct. for 2 days, Sulfameth/Trimethprim 800/160 mg tablets, 20 ct. for 10 days; these prescriptions were called-in to the pharmacy by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and the prescriptions were filled the same day.

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- Dr. Washington did not see or treat Patient B, did not direct or supervise 70. Respondent in her treatment of Patient B, and did not specifically direct Respondent to issue a prescription to Patient B.
- 71. On October 8, 2019, at Vida Spa, Respondent performed a liposuction procedure on the arms of Patient B. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient B, which Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner for Patient B, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.
- 72. Respondent was not supervised by any licensed physician while performing this invasive surgical procedure on Patient B at Vida Spa.

COUNT V

NRS 630.400(1) – Unlicensed Practice of Medicine

- 73. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- Respondent practiced medicine without a license when she treated Patient B on 74. October 7 and 8, 2019.
- Respondent, having been previously disciplined by the Arizona Board and 75. incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by her subsequent application to the Board for a license to practice medicine in the State of Nevada, among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.
- By reason of the foregoing, Respondent is subject to discipline by the Board as 76. provided in NRS 630.352.

COUNT VI

NRS 630.301(4) - Malpractice

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

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78. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient B, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient B without first obtaining a license to practice medicine in the State of Nevada, by performing an invasive surgical procedure on Patient B, by administering tumescent anesthesia to Patient B utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, by issuing a fraudulent and illegal prescription for a controlled substances to Patient B, and by treating Patient B without the direct supervision of a licensed physician.

By reason of the foregoing, Respondent is subject to discipline by the Board as 79. provided in NRS 630.352.

COUNT VII

NRS 630.3062(1)(h) - Fraudulent, Illegal, Unauthorized and Otherwise Inappropriate Prescribing of Schedule IV Controlled Substance

- 80. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- As demonstrated by, but not limited to, the above-outlined facts, Respondent issued 81. a fraudulent, illegal, unauthorized and otherwise inappropriate prescription for a Schedule IV controlled substances, Tramadol, to Patient B by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient B without first obtaining a license to practice medicine in the State of Nevada, a DEA registration, and a controlled substance license issued by the NSBOP, and by issuing a fraudulent and illegal prescription for a Schedule IV controlled substances to Patient B.
- 82. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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COUNT VIII

NRS 630.301(9) – Disreputable Conduct

- All of the allegations contained in the above paragraphs are hereby incorporated by 83. reference as though fully set forth herein.
- Respondent engaged in conduct that brings the medical profession into disrepute 84. by, among other misconduct, knowingly, willfully and feloniously practicing medicine without first obtaining a license to practice medicine in the State of Nevada, and by performing an invasive surgical procedure on Patient B, by administering tumescent anesthesia to Patient B utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, by issuing a fraudulent and illegal prescription for a Schedule IV controlled substances to Patient B, and by treating Patient B without the direct supervision of a licensed physician.
- 85. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.
 - C. Respondent's Treatment of Patient C Without a License
 - 86. Patient C was a forty-three (43) year-old female at the time of the events at issue.
- 87. At all times relevant to Respondent's treatment of Patient C, the so-called "medical director" of Vida Spa was Sherman Washington, Jr., M.D.
- 88. On October 9, 2019, Respondent, who did not have her own DEA registration and controlled substance license issued by the NSBOP, utilized the prescribing credentials of Sherman Washington, Jr., M.D., to issue fraudulent prescriptions to Patient C for Tramadol (a Schedule IV Controlled Substance) 50 mg tablets, 24 ct. for 3 days, Diazepam (a Schedule IV Controlled Substance) 10 mg tablets, 12 ct. for 4 days, Promethazine 25 mg tablets, 20 ct for 5 days, and Sulfameth/Trimethprim 800/160 mg tablets, 20 ct. for 10 days; these prescriptions were called-in to the pharmacy by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and the prescriptions were filled the same day.
- 89. Respondent instructed Patient C to take the Schedule IV controlled substances in a manner that materially deviated from the issued prescriptions; Respondent instructed Patient C to

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take Tramadol 50mg, 2 tablets, and Diazepam 10 mg, 1 tablet, one hour in advance an invasive, surgical liposuction procedure Respondent planned to perform on Patient C at Vida Spa on October 9, 2019, for the purpose of conscious sedation.

- 90. Respondent wrote the prescriptions for these controlled substances and instructed Patient C to deviate from the issued prescription in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2).
- Dr. Washington did not see or treat Patient C, did not direct or supervise 91. Respondent in her treatment of Patient C, and did not specifically direct Respondent to issue prescriptions to Patient C.
- 92. On October 9, 2019, at Vida Spa, Respondent performed a liposuction procedure on the arms of Patient C. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient C, which Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner for Patient C, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.
- Respondent was not supervised by any licensed physician while performing this 93. invasive surgical procedure on Patient C at Vida Spa.

COUNT IX

NRS 630.400(1) – Unlicensed Practice of Medicine

- 94. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 95. Respondent practiced medicine without a license when she treated Patient C on October 9, 2019.
- Respondent, having been previously disciplined by the Arizona Board and 96. incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by her subsequent application to the Board for a license to practice medicine in the State of Nevada,

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among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.

By reason of the foregoing, Respondent is subject to discipline by the Board as 97. provided in NRS 630.352.

COUNT X

NRS 630.301(4) - Malpractice

- 98. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 99. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient C, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient C without first obtaining a license to practice medicine in the State of Nevada, by performing an invasive surgical procedure on Patient C, by administering tumescent anesthesia to Patient C utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, by issuing fraudulent and illegal prescriptions for controlled substances to Patient C, by instructing Patient C to take controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2), and by treating Patient C without the direct supervision of a licensed physician.
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XI

NRS 630.3062(1)(h) - Fraudulent, Illegal, Unauthorized and Otherwise Inappropriate Prescribing of Schedule IV Controlled Substance

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

102. As demonstrated by, but not limited to, the above-outlined facts, Respondent issued fraudulent, illegal, unauthorized and otherwise inappropriate prescriptions for Schedule IV controlled substances, Tramadol and Diazepam, to Patient C by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient C without first obtaining a license to practice medicine in the State of Nevada, a DEA registration, and a controlled substance license issued by the NSBOP, by issuing fraudulent and illegal prescriptions for these controlled substances to Patient C, by instructing Patient C to take these controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2).

103. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XII

NRS 630.301(9) - Disreputable Conduct

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

by, among other misconduct, knowingly, willfully and feloniously practicing medicine without first obtaining a license to practice medicine in the State of Nevada, by performing an invasive surgical procedure on Patient C, by administering tumescent anesthesia to Patient C utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, by issuing fraudulent and illegal prescriptions for Schedule IV controlled substances to Patient C, by instructing Patient C to take these controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2), and by treating Patient C without the direct supervision of a licensed physician.

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By reason of the foregoing, Respondent is subject to discipline by the Board as 106. provided in NRS 630.352.

Respondent's Treatment of Patient D Without a License D.

- 107. Patient D was a twenty-two (22) year-old female at the time of the events at issue.
- At all times relevant to Respondent's treatment of Patient D, the so-called "medical 108. director" of Vida Spa was Sherman Washington, Jr., M.D.
- On October 12, 2019, Respondent, who did not have her own DEA registration and 109. controlled substance license issued by the NSBOP, utilized the prescribing credentials of Sherman Washington, Jr., M.D., to issue fraudulent prescriptions to Patient D for Tramadol (a Schedule IV Controlled Substance) 50 mg tablets, 24 ct. for 3 days and Diazepam (a Schedule IV Controlled Substance) 10 mg tablets, 8 ct. for 3 days; on information and belief, these prescriptions were called-in to the pharmacy by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and the prescriptions were filled the same day.
- On information and belief, Respondent instructed Patient D to take the Schedule IV controlled substances in a manner that materially deviated from the issued prescriptions; Respondent instructed Patient D to take Tramadol 50mg, 2 tablets, and Diazepam 10 mg, 1 tablet, one hour in advance an invasive, surgical liposuction procedure Respondent planned to perform on Patient D at Vida Spa on October 13, 2019, for the purpose of conscious sedation.
- 111. On information and belief, Respondent wrote the prescriptions for these controlled substances and instructed Patient D to deviate from the issued prescription in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2).
- Dr. Washington did not see or treat Patient D, did not direct or supervise Respondent in her treatment of Patient D, and did not specifically direct Respondent to issue prescriptions to Patient D.
- On October 13, 2019, at Vida Spa, Respondent performed a liposuction procedure on the abdomen and medial inferior upper arms of Patient D. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient D, which Respondent obtained, without a

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patient-specific prescription or an order from a licensed practitioner for Patient D, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.

Respondent was not supervised by any licensed physician while performing this 114. invasive surgical procedure on Patient D at Vida Spa.

COUNT XIII

NRS 630.400(1) - Unlicensed Practice of Medicine

- All of the allegations contained in the above paragraphs are hereby incorporated by 115. reference as though fully set forth herein.
- Respondent practiced medicine without a license when she treated Patient D on 116. October 12 and 13, 2019.
- Respondent, having been previously disciplined by the Arizona Board and incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by her subsequent application to the Board for a license to practice medicine in the State of Nevada, among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.
- By reason of the foregoing, Respondent is subject to discipline by the Board as 118. provided in NRS 630.352.

COUNT XIV

NRS 630.301(4) - Malpractice

- All of the allegations contained in the above paragraphs are hereby incorporated by 119. reference as though fully set forth herein.
- As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient D, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient D without first obtaining a license to practice medicine in the State of Nevada, by performing an

invasive surgical procedure on Patient D, by administering tumescent anesthesia to Patient D utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, by issuing fraudulent and illegal prescriptions for controlled substances to Patient D, by instructing Patient D to take controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2), and by treating Patient D without the direct supervision of a licensed physician.

121. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XV

NRS 630.3062(1)(h) – Fraudulent, Illegal, Unauthorized and Otherwise Inappropriate Prescribing of Schedule IV Controlled Substance

- 122. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 123. As demonstrated by, but not limited to, the above-outlined facts, Respondent issued fraudulent, illegal, unauthorized and otherwise inappropriate prescriptions for Schedule IV controlled substances, Tramadol and Diazepam, to Patient D by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient D without first obtaining a license to practice medicine in the State of Nevada, a DEA registration, and a controlled substance license issued by the NSBOP, by issuing fraudulent and illegal prescriptions for these controlled substances to Patient D, by instructing Patient D to take these controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2).
- 124. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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COUNT XVI

NRS 630.301(9) - Disreputable Conduct

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

126. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, knowingly, willfully and feloniously practicing medicine without first obtaining a license to practice medicine in the State of Nevada, and by performing an invasive surgical procedure on Patient D, administering tumescent anesthesia to Patient D utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, issuing fraudulent prescriptions for controlled substances to Patient D, violating and attempting to conceal violations of NRS 449.442(1)-(2), and 21 CFR §1306.04(a)-(b) and NRS 453.381, and treating Patient D without the direct supervision of a licensed physician.

E. Respondent's Treatment of Patient E Without a License

- 127. Patient E was a thirty-three (33) year-old female at the time of the events at issue
- 128. At all times relevant to Respondent's treatment of Patient E, the so-called "medical director" of Vida Spa was Sherman Washington, Jr., M.D.
- 129. On October 8, 2019, Respondent, who did not have her own DEA registration and controlled substance license issued by the NSBOP, utilized the prescribing credentials of Sherman Washington, Jr., M.D., to issue a fraudulent prescription to Patient E for Tramadol (a Schedule IV Controlled Substance) 50 mg tablets, 20 ct. for 4 days, which prescription was filled the same day.
- Dr. Washington did not see or treat Patient E, did not direct or supervise Respondent in her treatment of Patient E, and did not specifically direct Respondent to issue a prescription to Patient E.
- On October 8, 2019, at Vida Spa, Respondent performed a liposuction procedure 131. on the arms of Patient E. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient E, which Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner for Patient E, from a general store of controlled substances and

dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.

132. Respondent was not supervised by any licensed physician while performing this invasive surgical procedure on Patient E at Vida Spa.

COUNT XVII

NRS 630.400(1) – Unlicensed Practice of Medicine

- 133. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 134. Respondent practiced medicine without a license when she treated Patient E on October 7 and 8, 2019.
- 135. Respondent, having been previously disciplined by the Arizona Board and incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by her subsequent application to the Board for a license to practice medicine in the State of Nevada, among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.
- 136. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XVIII

NRS 630.301(4) - Malpractice

- 137. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 138. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient E, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient E without first obtaining a license to practice medicine in the State of Nevada, by performing an invasive surgical procedure on Patient E, by administering tumescent anesthesia to Patient E utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous

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drugs used for general administration and dispensing to patients, by issuing a fraudulent and illegal prescription for a controlled substances to Patient E, and by treating Patient E without the direct supervision of a licensed physician.

By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XIX

NRS 630.3062(1)(h) - Fraudulent, Illegal, Unauthorized and Otherwise Inappropriate Prescribing of Schedule IV Controlled Substance

- 140. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 141. As demonstrated by, but not limited to, the above-outlined facts, Respondent issued a fraudulent, illegal, unauthorized and otherwise inappropriate prescription for a Schedule IV controlled substances, Tramadol, to Patient E by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient E without first obtaining a license to practice medicine in the State of Nevada, a DEA registration, and a controlled substance license issued by the NSBOP, and by issuing a fraudulent and illegal prescription for a Schedule IV controlled substances to Patient E.
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XX

NRS 630.301(9) – Disreputable Conduct

- 143. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 144. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, knowingly, willfully and feloniously practicing medicine without first obtaining a license to practice medicine in the State of Nevada, and by performing an invasive surgical procedure on Patient E, by administering tumescent anesthesia to Patient E utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous

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drugs used for general administration and dispensing to patients, by issuing a fraudulent and illegal prescription for a Schedule IV controlled substances to Patient E, and by treating Patient E without the direct supervision of a licensed physician.

By reason of the foregoing, Respondent is subject to discipline by the Board as 145. provided in NRS 630.352.

F. Respondent's Treatment of Patient F Without a License

- 146. Patient F was a male of unknown age at the time of the events at issue.
- At all times relevant to Respondent's treatment of Patient F, the so-called "medical 147. director" of Vida Spa was Sherman Washington, Jr., M.D.
- On October 24, 2019, Respondent obtained, without a patient-specific prescription 148. or an order from a licensed practitioner for Patient F, "Botox," a neuromodulator that is derived from Clostridium botulinum or is biosimilar to or the bioequivalent of such a neuromodulator, and "Versa," a hyaluronic acid dermal filler, both of which are dangerous drugs as defined by NRS 454.201, from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients.
- Dr. Washington did not see or treat Patient F, and did not direct or supervise Respondent in her treatment of Patient F.
- 150. On October 24, 2019, at Vida Spa, Respondent injected, and thereby administered pursuant to NRS 454.191, the aforementioned Botox and Versa into various locations on the face of Patient F.
- Respondent was not supervised by any licensed physician while performing this 151. injection procedure on Patient F at Vida Spa.

COUNT XXI

NRS 630.306(1)(u) - Illegal Injection of Botox

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

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As demonstrated by, but not limited to, the above-outlined facts, Respondent injected Botox into the face of Patient F in violation of NRS 629.086 when she did so without a license to practice any form of medicine pursuant to NRS Chapter 630, NRS 631.391, NRS Chapter 633, or NRS 635.086, and at a location that is neither a medical facility, as defined in NRS 449.0151, nor at the office of a physician or physician assistant, licensed pursuant to NRS Chapters 630 or 633, dentist, advanced practice registered nurse or podiatric physician.

By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXII

NRS 630.306(1)(u) - Illegal Injection of Versa

- 155. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- As demonstrated by, but not limited to, the above-outlined facts, Respondent 156. injected Versa into the face of Patient F in violation of NRS 454.217 when she did so without a license to practice any form of medicine pursuant to NRS Chapter 630, NRS 631.391, NRS Chapter 633, or NRS 635.086, and at a location that is neither a medical facility, as defined in NRS 449.0151, nor at the office of a physician or physician assistant, licensed pursuant to NRS Chapters 630 or 633, dentist, advanced practice registered nurse or podiatric physician.
- 157. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXIII

NRS 630.400(1) - Unlicensed Practice of Medicine

- All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- Respondent practiced medicine without a license when she treated Patient F on October 24, 2019.
- Respondent, having been previously disciplined by the Arizona Board and 160. incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her

license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by her subsequent application to the Board for a license to practice medicine in the State of Nevada, among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.

161. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXIV

NRS 630.301(4) - Malpractice

- 162. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 163. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient F, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient F without first obtaining a license to practice medicine in the State of Nevada, and by obtaining, without a patient-specific prescription or an order from a licensed practitioner for Patient F, dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs, and by injecting Botox and Versa into the face of Patient F in violation of NRS 629.086 and NRS 454.217, respectively, and by treating Patient F without the direct supervision of a licensed physician.
- 164. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXV

NRS 630.301(9) - Disreputable Conduct

- 165. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 166. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, knowingly, willfully and feloniously practicing medicine with

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respect to Patient F without first obtaining a license to practice medicine in the State of Nevada, and by obtaining, without a patient-specific prescription or an order from a licensed practitioner for Patient F, dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs, and by injecting Botox and Versa into the face of Patient F in violation of NRS 629.086 and NRS 454.217, respectively, and by treating Patient F without the direct supervision of a licensed physician.

By reason of the foregoing, Respondent is subject to discipline by the Board as 167. provided in NRS 630.352.

G. Respondent's Treatment of Patient G Without a License

- 168. Patient G was a sixty-six (66) year-old female at the time of the events at issue.
- At all times relevant to Respondent's treatment of Patient G, the so-called "medical 169. director" of Vida Spa was Sherman Washington, Jr., M.D.
- 170. On October 29, 2019, Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner for Patient G, "Xeomin," a neuromodulator that is derived from Clostridium botulinum or is biosimilar to or the bioequivalent of such a neuromodulator, and "Versa," a hyaluronic acid dermal filler, both of which are dangerous drugs as defined by NRS 454.201, from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients.
- 171. Dr. Washington did not see or treat Patient G, did not direct or supervise Respondent in her treatment of Patient G.
- On October 24, 2019, at Vida Spa, Respondent injected, and thereby administered pursuant to NRS 454.191, the aforementioned Xeomin and Versa into various locations on the face of Patient G.
- Respondent was not supervised by any licensed physician while performing this 173. injection procedure on Patient G at Vida Spa.

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COUNT XXVI

NRS 630.306(1)(u) - Illegal Injection of Xeomin

- 174. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- As demonstrated by, but not limited to, the above-outlined facts, Respondent 175. injected Xeomin into the face of Patient G in violation of NRS 629.086 when she did so without a license to practice any form of medicine pursuant to NRS Chapter 630, NRS 631.391, NRS Chapter 633, or NRS 635.086, and at a location that is neither a medical facility, as defined in NRS 449.0151, nor at the office of a physician or physician assistant, licensed pursuant to NRS Chapters 630 or 633, dentist, advanced practice registered nurse or podiatric physician.
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXVII

NRS 630.306(1)(u) – Illegal Injection of Versa

- 177. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- As demonstrated by, but not limited to, the above-outlined facts, Respondent 178. injected Versa into the face of Patient G in violation of NRS 454.217 when she did so without a license to practice any form of medicine pursuant to NRS Chapter 630, NRS 631.391, NRS Chapter 633, or NRS 635.086, and at a location that is neither a medical facility, as defined in NRS 449.0151, nor at the office of a physician or physician assistant, licensed pursuant to NRS Chapters 630 or 633, dentist, advanced practice registered nurse or podiatric physician.
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXVIII

NRS 630.400(1) – Unlicensed Practice of Medicine

All of the allegations contained in the above paragraphs are hereby incorporated by 180. reference as though fully set forth herein.

181.	Respondent p	racticed	medicine	without	a	license	when	she	treated	Patient	G	or
October 29, 20	19.											

- 182. Respondent, having been previously disciplined by the Arizona Board and incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by her subsequent application to the Board for a license to practice medicine in the State of Nevada, among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.
- 183. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXIX

NRS 630.301(4) - Malpractice

- 184. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 185. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient G, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient G without first obtaining a license to practice medicine in the State of Nevada, and by obtaining, without a patient-specific prescription or an order from a licensed practitioner for Patient G, dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs, and by injecting Xeomin and Versa into the face of Patient G in violation of NRS 629.086 and NRS 454.217, respectively, and by treating Patient G without the direct supervision of a licensed physician.
- 186. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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COUNT XXX

NRS 630.301(9) - Disreputable Conduct

- 187. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 188. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient G without first obtaining a license to practice medicine in the State of Nevada, and by obtaining, without a patient-specific prescription or an order from a licensed practitioner for Patient G, dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs, and by injecting Xeomin and Versa into the face of Patient G in violation of NRS 629.086 and NRS 454.217, respectively, and by treating Patient G without the direct supervision of a licensed physician.
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

H. Respondent's Treatment of Patient H Without a License

- Patient H was a forty-two (42) year-old person of unknown gender at the time of 190. the events at issue.
- At all times relevant to Respondent's treatment of Patient H, Vida Spa had no so-191. called "medical director," the directorship of Dr. Sherman Washington having terminated on November 1, 2019.
- At all times relevant to Respondent's treatment of Patient H, the only parties 192. responsible for Vida Spa's activities with respect to Patient H were Respondent and, on information and belief, the parties listed on Clark County Business License No. 2003447.081-172, under the business category of "Cosmetology Establishment - Other Services," the owners of Vida Spa: Art Matrix, Inc. and Gisselle Platfoot.
- 193. On November 5, 2019 obtained, without a patient-specific prescription or an order from a licensed practitioner for Patient H, "Versa," a hyaluronic acid dermal filler, a dangerous ///

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drug as defined by NRS 454.201, from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients.

- 194. On November 5, 2019, at Vida Spa, Respondent injected, and thereby administered pursuant to NRS 454.191, the aforementioned Versa into various locations on the face of Patient H.
- Respondent was not supervised by any licensed physician while performing this 195. injection procedure on Patient H at Vida Spa.

COUNT XXVI

NRS 630.306(1)(u) - Illegal Injection of Versa

- All of the allegations contained in the above paragraphs are hereby incorporated by 196. reference as though fully set forth herein.
- As demonstrated by, but not limited to, the above-outlined facts, Respondent 197. injected Versa into the face of Patient H in violation of NRS 454.217 when she did so without a license to practice any form of medicine pursuant to NRS Chapter 630, NRS 631.391, NRS Chapter 633, or NRS 635.086, and at a location that is neither a medical facility, as defined in NRS 449.0151, nor at the office of a physician or physician assistant, licensed pursuant to NRS Chapters 630 or 633, dentist, advanced practice registered nurse or podiatric physician.
- By reason of the foregoing, Respondent is subject to discipline by the Board as 198. provided in NRS 630.352.

COUNT XXVII

NRS 630.400(1) - Unlicensed Practice of Medicine

- All of the allegations contained in the above paragraphs are hereby incorporated by 199. reference as though fully set forth herein.
- Respondent practiced medicine without a license when she treated Patient H on 200. November 5, 2019.
- 201. Respondent, having been previously disciplined by the Arizona Board and incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by

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her subsequent application to the Board for a license to practice medicine in the State of Nevada, among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.

202. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXVIII

NRS 630.301(4) - Malpractice

- 203. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- As demonstrated by, but not limited to, the above-outlined facts, Respondent 204. committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient H, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient H without first obtaining a license to practice medicine in the State of Nevada, and by obtaining, without a patient-specific prescription or an order from a licensed practitioner for Patient H, dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs, and by injecting Versa into the face of Patient H in violation of NRS 454.217, and by treating Patient H without the direct supervision of a licensed physician.
- 205. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXIX

NRS 630.301(9) – Disreputable Conduct

- 206. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 207. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient H, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient H without first obtaining a license to practice medicine in the

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State of Nevada, and by obtaining, without a patient-specific prescription or an order from a licensed practitioner for Patient H, dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs, and by injecting Versa into the face of Patient H in violation of NRS 454.217, and by treating Patient H without the direct supervision of a licensed physician.

208. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

RESPONDENT'S FRAUD IN OBTAINING LICENSURE

COUNT XXX

NRS 630.304(1) - Fraud and Misrepresentation in Obtaining a License

- All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 210. As demonstrated by, but not limited to, the above-outlined facts, Respondent obtained a license to practice medicine by fraud, misrepresentation and false, misleading, inaccurate and incomplete statements when, on March 6, 2020, in a public meeting of the Board, when the Board was considering her application for licensure as a physician assistant in the State of Nevada, in open session, Respondent informed the Board that she had not practiced clinical medicine since she had been incarcerated, and stated that, though she had secured a job at a medical spa, and planned in the future to perform plastic surgery injections, in-office procedures, excisions, and assisting with different procedures, nevertheless, she had not done so yet and the aforementioned job offer was contingent upon her obtaining a license in Nevada.
- 211. As demonstrated by, but not limited to, the above-outlined facts, Respondent's statements to the Board on March 6, 2020, were materially false and Respondent knew they were materially false when she made the statements.
- As demonstrated by, but not limited to, the above-outlined facts, Respondent's statements to the Board on March 6, 2020, were knowing misrepresentations of the truth and made to conceal material facts that would have prevented her from obtaining licensure.
- 213. As demonstrated by, but not limited to, the above-outlined facts, Respondent's statements to the Board on March 6, 2020, were intentionally misleading, and made to induce the

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Board to act to the detriment of the public safety by issuing her a license to practice medicine, despite the fact that she had already been knowingly, willingly, feloniously practicing medicine without a license.

- By reason of the foregoing, Respondent is subject to discipline by the Board as 214. provided in NRS 630.352.
- RESPONDENT'S PERFORMANCE OF MEDICAL SERVICES UNPERMITTED AND PURSUANT TO NRS 449.442, AND RELATED VIOLATIONS OF THE NEVADA MEDICAL PRACTICE ACT
 - I. Respondent's Treatment of Patient I
 - 215. Patient I was a twenty-nine (29) year-old female at the time of the events at issue.
- At all times relevant to Respondent's treatment of Patient I, the so-called "medical 216. director" of Vida Spa was Salvador Borromeo, III, M.D.
- At all times relevant to Respondent's treatment of Patient I, Respondent did not 217. have a supervising physician, and did not have a supervising physician agreement on file with and accepted by the Board, and was therefore expressly prohibited from performing medical services pursuant to NAC 630.375(2).
- 218. The medical services rendered to Patient I by Respondent did not occur in a lifethreatening or emergency situation.
- 219. On June 1, 2020, Respondent, who did not have her own DEA registration and controlled substance license issued by the NSBOP, utilized the prescribing credentials of Salvador Borromeo, III, M.D., to issue prescriptions to Patient I for Oxycodone-acetaminophen (a Schedule II Controlled Substance) 5-325 mg tablets, 12 ct. for 3 days; Alprazolam (a Schedule IV Controlled Substance) 1 mg tablets, 4 ct. for 2 days; Promethazine 25 mg tablets, 10 ct. for 2 days, Sulfameth/Trimethprim 800/160 mg tablets, 20 ct. for 10 days.
- Respondent issued prescriptions for these controlled substances and dangerous 220. drugs by using the pre-printed prescription pad of Salvador Borromeo, III, M.D., which contained his pre-printed DEA number; the prescription was completed by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, with Patient I's name and with the

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corresponding medications, quantities and doses. Respondent, or a Vida Spa employee or agent acting at Respondent's direction, presented the prescription to Dr. Borromeo, who then signed the prescription with the understanding that the controlled substances and dangerous drugs would then be used by Respondent on Patient I for the purpose of performing an invasive surgical procedure on Patient I.

- 221. The material purpose for prescribing the controlled substances to Patient I was conscious sedation and pain control for an invasive surgical procedure to be performed on Patient I.
- 222. Dr. Borromeo's express purpose in signing the already completed written prescriptions for controlled substances for Patient I was for conscious sedation and pain control for invasive surgical procedure to be performed on Patient I.
- 223. The written prescription issued for Patient I in this manner was then presented to Pharmacy Santa Maria, at 3827 E. Sunset Rd, Ste L, Las Vegas, Nevada 89120, which filled the prescription, and the controlled substances and dangerous drugs were then delivered directly to Vida Spa. The controlled substances and dangerous drugs were accepted at Vida Spa by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and then administered to Patient I by Respondent, or by a Vida Spa employee or agent supervised directly by Respondent.
- Respondent, a Vida Spa employee or agent acting at Respondent's direction in the Respondent's presence, or Patient I at the direction and in the presence of Respondent, directly administered to Patient I the controlled substances, Alprazolam and Oxycodone-acetominophen, by ingestion.
- 225. Dr. Borromeo did not see or treat Patient I, and did not direct or supervise Respondent in her treatment of Patient I.
- 226. On June 2, 2020, at Vida Spa, Respondent performed a liposuction procedure on the upper and lower abdomen and arms of Patient I, and a fat grafting procedure to Patient I's breasts. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient I, which Respondent obtained, without a patient-specific prescription or an order from a

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licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient I, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.

Respondent was not supervised by any licensed physician while performing this 227. invasive surgical procedure on Patient I at Vida Spa.

COUNT XXXI

NAC 630.380(1)(a) – Performing Medical Services Without A Supervising Physician

- 228. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- Respondent performed medical services without the direction and supervision of a 229. supervising physician, and in a non-emergency and non-life-threatening situation, when she treated Patient I on June 1 and 2, 2020.
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXXII

NRS 630.301(4) - Malpractice

- All of the allegations contained in the above paragraphs are hereby incorporated by 231. reference as though fully set forth herein.
- 232. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient I by performing an invasive surgical procedure on Patient I without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient I utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient I, by administering or directly supervising the administration of conscious sedation to Patient I, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).

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233. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXXIII

NRS 630.306(1)(o) - Administration of Conscious Sedation at an Unaccredited and **Unpermitted Facility**

- All of the allegations contained in the above paragraphs are hereby incorporated by 234. reference as though fully set forth herein.
- As demonstrated by, but not limited to, the above-outlined facts, Respondent failed 235. to comply with NRS 630.373 when rendering medical services to Patient I, by, among other misconduct, administering and/or supervising directly the administration of conscious sedation to Patient I for an invasive surgical procedure that Respondent performed on Patient I at Vida Spa, which is not the office of a physician or osteopathic physician which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, not a facility which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, and not a medical facility as that term is defined in NRS 449.0151, and which is located inside the State of Nevada.
- 236. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXXIV

NRS 630.301(9) – Disreputable Conduct

- All of the allegations contained in the above paragraphs are hereby incorporated by 237. reference as though fully set forth herein.
- Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, by performing an invasive surgical procedure on Patient I without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient I utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patientspecific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient I, by administering or directly supervising the

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administration of conscious sedation to Patient I, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).

By reason of the foregoing, Respondent is subject to discipline by the Board as 239. provided in NRS 630.352.

J. Respondent's Treatment of Patient J

- 240. Patient J was a forty (40) year-old female at the time of the events at issue.
- 241. At all times relevant to Respondent's treatment of Patient J, the so-called "medical director" of Vida Spa was Salvador Borromeo, III, M.D.
- At all times relevant to Respondent's treatment of Patient J, Respondent did not have a supervising physician, and did not have a supervising physician agreement on file with and accepted by the Board, and was therefore expressly prohibited from performing medical services pursuant to NAC 630.375(2).
- 243. The medical services rendered to Patient J by Respondent did not occur in a lifethreatening or emergency situation.
- On June 2, 2020, Respondent, who did not have her own DEA registration and controlled substance license issued by the NSBOP, utilized the prescribing credentials of Salvador Borromeo, III, M.D., to issue prescriptions to Patient J for Oxycodone-acetaminophen (a Schedule II Controlled Substance) 5-325 mg tablets, 12 ct. for 3 days; Alprazolam (a Schedule IV Controlled Substance) 1 mg tablets, 4 ct. for 2 days; Promethazine 25 mg tablets, 10 ct. for 2 days, Sulfameth/Trimethprim 800/160 mg tablets, 20 ct. for 10 days.
- 245. Respondent issued prescriptions for these controlled substances and dangerous drugs by using the pre-printed prescription pad of Salvador Borromeo, III, M.D., which contained his pre-printed DEA number; the prescription was completed by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, with Patient J's name and with the corresponding medications, quantities and doses. Respondent, or a Vida Spa employee or agent acting at Respondent's direction, presented the prescription to Dr. Borromeo, who then signed the prescription with the understanding that the controlled substances and dangerous drugs 111

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would then be used by Respondent on Patient J for the purpose of performing an invasive surgical procedure on Patient J.

- The material purpose for prescribing the controlled substances to Patient J was 246. conscious sedation and pain control for an invasive surgical procedure to be performed on Patient J.
- Dr. Borromeo's express purpose in signing the already completed written 247. prescriptions for controlled substances for Patient J was for conscious sedation and pain control for invasive surgical procedure to be performed on Patient J.
- 248. The written prescription issued for Patient J in this manner was then presented to Pharmacy Santa Maria, at 3827 E. Sunset Rd, Ste L, Las Vegas, Nevada 89120, which filled the prescription, and the controlled substances and dangerous drugs were then delivered directly to Vida Spa. The controlled substances and dangerous drugs were accepted at Vida Spa by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and then administered to Patient J by Respondent, or by a Vida Spa employee or agent supervised directly by Respondent.
- 249. Respondent, a Vida Spa employee or agent acting at Respondent's direction in the Respondent's presence, or Patient J at the direction and in the presence of Respondent, directly administered to Patient J the controlled substances, Alprazolam and Oxycodone-acetominophen, by ingestion.
- Dr. Borromeo did not see or treat Patient J, and did not direct or supervise 250. Respondent in her treatment of Patient J.
- On June 3, 2020, at Vida Spa, Respondent performed a liposuction procedure on Patient J. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient J, which Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient J, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.

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Respondent was not supervised by any licensed physician while performing this 252. invasive surgical procedure on Patient J at Vida Spa.

COUNT XXXV

NAC 630.380(1)(a) - Performing Medical Services Without A Supervising Physician

- 253. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- Respondent performed medical services without the direction and supervision of a 254. supervising physician, and in a non-emergency and non-life-threatening situation, when she treated Patient J on June 2 and 3, 2020.
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXXVI

NRS 630.301(4) - Malpractice

- 256. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 257. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient J by performing an invasive surgical procedure on Patient J without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient J utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient J, by administering or directly supervising the administration of conscious sedation to Patient J, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).
- 258. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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COUNT XXXVII

NRS 630.306(1)(o) – Administration of Conscious Sedation at an Unaccredited and Unpermitted Facility

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

260. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed to comply with NRS 630.373 when rendering medical services to Patient J, by, among other misconduct, administering and/or supervising directly the administration of conscious sedation to Patient J for an invasive surgical procedure that Respondent performed on Patient J at Vida Spa, which is not the office of a physician or osteopathic physician which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, not a facility which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, and not a medical facility as that term is defined in NRS 449.0151, and which is located inside the State of Nevada.

261. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXXVIII

NRS 630.301(9) – Disreputable Conduct

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

263. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, by performing an invasive surgical procedure on Patient J without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient J utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient J, by administering or directly supervising the administration of conscious sedation to Patient J, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).

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By reason of the foregoing, Respondent is subject to discipline by the Board as 264. provided in NRS 630.352.

K. Respondent's Treatment of Patient K

- 265. Patient K was a thirty-five (35) year-old female at the time of the events at issue.
- 266. At all times relevant to Respondent's treatment of Patient K, the so-called "medical director" of Vida Spa was Salvador Borromeo, III, M.D.
- At all times relevant to Respondent's treatment of Patient K, Respondent did not 267. have a supervising physician, and did not have a supervising physician agreement on file with and accepted by the Board, and was therefore expressly prohibited from performing medical services pursuant to NAC 630.375(2).
- The medical services rendered to Patient K by Respondent did not occur in a lifethreatening or emergency situation.
- On June 3, 2020, Respondent, who did not have her own DEA registration and controlled substance license issued by the NSBOP, utilized the prescribing credentials of Salvador Borromeo, III, M.D., to issue prescriptions to Patient K for Oxycodone-acetaminophen (a Schedule II Controlled Substance) 5-325 mg tablets, 12 ct. for 3 days; Alprazolam (a Schedule IV Controlled Substance) 1 mg tablets, 4 ct. for 2 days; Promethazine 25 mg tablets, 10 ct. for 2 days, Sulfameth/Trimethprim 800/160 mg tablets, 20 ct. for 10 days.
- 270. Respondent issued prescriptions for these controlled substances and dangerous drugs by using the pre-printed prescription pad of Salvador Borromeo, III, M.D., which contained his pre-printed DEA number; the prescription was completed by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, with Patient K's name and with the corresponding medications, quantities and doses. Respondent, or a Vida Spa employee or agent acting at Respondent's direction, presented the prescription to Dr. Borromeo, who then signed the prescription with the understanding that the controlled substances and dangerous drugs would then be used by Respondent on Patient K for the purpose of performing an invasive surgical procedure on Patient K.

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- 272. Dr. Borromeo's express purpose in signing the already completed written prescriptions for controlled substances for Patient K was for conscious sedation and pain control for invasive surgical procedure to be performed on Patient K.
- 273. The written prescription issued for Patient K in this manner was then presented to Pharmacy Santa Maria, at 3827 E. Sunset Rd, Ste L, Las Vegas, Nevada 89120, which filled the prescription, and the controlled substances and dangerous drugs were then delivered directly to Vida Spa. The controlled substances and dangerous drugs were accepted at Vida Spa by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and then administered to Patient K by Respondent, or by a Vida Spa employee or agent supervised directly by Respondent.
- 274. Respondent, a Vida Spa employee or agent acting at Respondent's direction in the Respondent's presence, or Patient K at the direction and in the presence of Respondent, directly administered to Patient K the controlled substances, Alprazolam and Oxycodone-acetominophen, by ingestion.
- 275. Dr. Borromeo did not see or treat Patient K, and did not direct or supervise Respondent in her treatment of Patient K.
- 276. On June 4, 2020, at Vida Spa, Respondent performed a liposuction procedure on the upper back and flanks of Patient K. On information and belief, Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient K, which Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient K, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.
- 277. Respondent was not supervised by any licensed physician while performing this invasive surgical procedure on Patient K at Vida Spa.

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COUNT XXXIX

NAC 630.380(1)(a) - Performing Medical Services Without A Supervising Physician

- All of the allegations contained in the above paragraphs are hereby incorporated by 278. reference as though fully set forth herein.
- 279. Respondent performed medical services without the direction and supervision of a supervising physician, and in a non-emergency and non-life-threatening situation, when she treated Patient K on June 3 and 4, 2020.
- 280. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XL

NRS 630.301(4) - Malpractice

- 281. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 282. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient K by performing an invasive surgical procedure on Patient K without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient K utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient K, by administering or directly supervising the administration of conscious sedation to Patient K, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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

COUNT XLI

NRS 630.306(1)(0) – Administration of Conscious Sedation at an Unaccredited and Unpermitted Facility

- 284. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 285. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed to comply with NRS 630.373 when rendering medical services to Patient K, by, among other misconduct, administering and/or supervising directly the administration of conscious sedation to Patient K for an invasive surgical procedure that Respondent performed on Patient K at Vida Spa, which is not the office of a physician or osteopathic physician which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, not a facility which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, and not a medical facility as that term is defined in NRS 449.0151, and which is located inside the State of Nevada.
- 286. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XLII

NRS 630.301(9) - Disreputable Conduct

- 287. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 288. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, by performing an invasive surgical procedure on Patient K without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient K utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient K, by administering or directly supervising the administration of conscious sedation to Patient K, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).

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289. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

L. Respondent's Treatment of Patient L

- 290. Patient L was a forty (40) year-old female at the time of the events at issue.
- 291. At all times relevant to Respondent's treatment of Patient L, the so-called "medical director" of Vida Spa was Salvador Borromeo, III, M.D.
- 292. At all times relevant to Respondent's treatment of Patient L, Respondent did not have a supervising physician, and did not have a supervising physician agreement on file with and accepted by the Board, and was therefore expressly prohibited from performing medical services pursuant to NAC 630.375(2).
- The medical services rendered to Patient L by Respondent did not occur in a lifethreatening or emergency situation.
- 294. On June 4, 2020, Respondent, who did not have her own DEA registration and controlled substance license issued by the NSBOP, utilized the prescribing credentials of Salvador Borromeo, III, M.D., to issue prescriptions to Patient L for Oxycodone-acetaminophen (a Schedule II Controlled Substance) 5-325 mg tablets, 12 ct. for 3 days; Alprazolam (a Schedule IV Controlled Substance) 1 mg tablets, 4 ct. for 2 days; Promethazine 25 mg tablets, 10 ct. for 2 days, Sulfameth/Trimethprim 800/160 mg tablets, 20 ct. for 10 days.
- 295. Respondent issued prescriptions for these controlled substances and dangerous drugs by using the pre-printed prescription pad of Salvador Borromeo, III, M.D., which contained his pre-printed DEA number; the prescription was completed by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, with Patient L's name and with the corresponding medications, quantities and doses. Respondent, or a Vida Spa employee or agent acting at Respondent's direction, presented the prescription to Dr. Borromeo, who then signed the prescription with the understanding that the controlled substances and dangerous drugs would then be used by Respondent on Patient L for the purpose of performing an invasive surgical procedure on Patient L.

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296. The material purpose for prescribing the controlled substances to Patient L was conscious sedation and pain control for an invasive surgical procedure to be performed on Patient L.

297. Dr. Borromeo's express purpose in signing the already completed written prescriptions for controlled substances for Patient L was for conscious sedation and pain control for invasive surgical procedure to be performed on Patient L.

298. The written prescription issued for Patient L in this manner was then presented to Pharmacy Santa Maria, at 3827 E. Sunset Rd, Ste L, Las Vegas, Nevada 89120, which filled the prescription, and the controlled substances and dangerous drugs were then delivered directly to Vida Spa. The controlled substances and dangerous drugs were accepted at Vida Spa by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and then administered to Patient L by Respondent, or by a Vida Spa employee or agent supervised directly by Respondent.

299. Respondent, a Vida Spa employee or agent acting at Respondent's direction in the Respondent's presence, or Patient L at the direction and in the presence of Respondent, directly administered to Patient L the controlled substances, Alprazolam and Oxycodone-acetominophen, by ingestion.

300. Dr. Borromeo did not see or treat Patient L, and did not direct or supervise Respondent in her treatment of Patient L.

301. On June 5, 2020, at Vida Spa, Respondent performed a liposuction procedure on the abdomen, flanks back and "bra straps" of Patient L, and a fat transfer to the buttocks of Patient L. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient L, which Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwised authorized to perform medical services for Patient L, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.

302. Respondent was not supervised by any licensed physician while performing this invasive surgical procedure on Patient L at Vida Spa.

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COUNT XLIII

NAC 630.380(1)(a) - Performing Medical Services Without A Supervising Physician

- 303. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 304. Respondent performed medical services without the direction and supervision of a supervising physician, and in a non-emergency and non-life-threatening situation, when she treated Patient L on June 4 and 5, 2020.
- 305. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XLIV

NRS 630.301(4) - Malpractice

- 306. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient L by performing an invasive surgical procedure on Patient L without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient L utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient L, by administering or directly supervising the administration of conscious sedation to Patient L, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).
- 308. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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COUNT XLV

NRS 630.306(1)(o) - Administration of Conscious Sedation at an Unaccredited and **Unpermitted Facility**

- 309. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- As demonstrated by, but not limited to, the above-outlined facts, Respondent failed to comply with NRS 630.373 when rendering medical services to Patient L, by, among other misconduct, administering and/or supervising directly the administration of conscious sedation to Patient L for an invasive surgical procedure that Respondent performed on Patient L at Vida Spa, which is not the office of a physician or osteopathic physician which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, not a facility which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, and not a medical facility as that term is defined in NRS 449.0151, and which is located inside the State of Nevada.
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XLVI

NRS 630.301(9) - Disreputable Conduct

- 312. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 313. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, by performing an invasive surgical procedure on Patient L without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient L utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patientspecific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient L, by administering or directly supervising the administration of conscious sedation to Patient L, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).

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314. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

V. RESPONDENT'S CONTINUAL FAILURE TO ENGAGE IN THE PRACTICE OF MEDICINE IN A PROFESSIONAL MANNER

COUNT XLVII

NRS 630.306(1)(g) – Continual Failure to Practice Medicine Properly

- 315. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- As demonstrated by, but not limited to, the above-outlined facts, by abundantly and 316. abidingly demonstrating through numerous, repeated, knowing, willful and criminal failures, both before and after her licensure in this state, by engaging in the unlicensed practice of medicine, committing malpractice, violating state and federal laws pertaining to the proper handling, prescription and administration of dangerous drugs and controlled substances, performing medical services without a supervising physician, and obtaining licensure in this state by fraud and misrepresentation, among other serious violations, Respondent has continually failed to exercise the skill and diligence and use the methods ordinarily exercised under the same circumstances by physicians in good standing practicing in the same specialty or field.
- 317. Respondent's conduct, considered in its entirety, is extraordinarily and persistently unprofessional in character.
- 318. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

WHEREFORE, the Investigative Committee prays:

- 1. That the Board give Respondent notice of the charges herein against her and give him notice that she may file an answer to the Complaint herein as set forth in NRS 630.339(2) within twenty (20) days of service of the Complaint;
- 2. That the Board set a time and place for a formal hearing after holding an Early Case Conference pursuant to NRS 630.339(3);

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- 3. That the Board 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 Board award fees and costs for the investigation and prosecution of this case as outlined in NRS 622.400;
- 5. 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; and
- 6. That the Board take such other and further action as may be just and proper in these premises.

DATED this 29 day of June, 2021.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

AARON B. FRICKE, J.D.

General Counsel 9600 Gateway Drive Reno, NV 89521

Tel: (775) 688-2559 Email: africke@medboard.nv.gov

Attorney for the Investigative Committee

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners

VERIFICATION

STATE OF NEVADA)
	: SS.
COUNTY OF CLARK)

(775) 688-2559

Victor M. Muro, 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 **25**th day of June, 2021.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: / M Mun

Chairman for the Investigative Committee

CERTIFICATE OF SERVICE

I hereby certify that I am employed by the Nevada State Board of Medical Examiners and that on the 28th day of June, 2021, I served a file-stamped copy of the **COMPLAINT** and the **PATIENT DESIGNATION** filed in this matter, via personal service, U.S. Certified Mail, and Fed Ex, to the following parties:

TAMMY LYNN KANKINS, PA-C 3753 Cherry Tree Blvd. Lake Havasu City, AZ 86406

*Certified Mailing No.: 9171 9690 0935 0255 6175 48 *Fed Ex Tracking: 7741 2012 6075

DATED this 25 day of June, 2021.

MERCEDES PUENTES

Legal Assistant

Nevada State Board of Medical Examiners

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners 9600 Gateway Drive Reno, Nevada 89521 (775) 688-2559

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and Complaint Against:

TAMMY LYNN HANKINS, PA-C,

Respondent.

Case No. 21-51633-1

(FILED UNDER SEAL)

FILED

JUN 25 2021

NEVADA STATE BOARD OF MEDICAL EXAMINERS

PATIENT DESIGNATION

(Board) hereby submits its PATIENT DESIGNATION to identify the true and correct identity of the patient(s) referenced in the filed formal Complaint, Case No. 21-51633-1. Patient A's true and correct identity is as follows: Name: FLORA BRANDT Patient B's true and correct identity is as follows: Name: MIRIAM PERDOMO DOB: October 22, 1987 Patient C's true and correct identity is as follows: Name: URSULA CADENAS Patient D's true and correct identity is as follows: Name: RAZ ROZA SHARVIT DOB: October 10, 1996 Patient E's true and correct identity is as follows: Name: YAINE PEREZ DOB: January 1, 1986 Patient F's true and correct identity is as follows: Name: JESUS RUIZ Patient G's true and correct identity is as follows: Name: SARA GODINEZ DOB: January 6, 1953 Patient H's true and correct identity is as follows: Name: JAIME LOPEZ

ll.		
1	9. Patient I's true and correct identity is as follows:	
2	Name: ESTEFANIA VALADEZ DOB: April 28, 1991	
3	DOD. April 20, 1991	
4	10. Patient J's true and correct identity is as follows:	
5	Name: VANESSA MEJIA DOB: March 14, 1980	
6	DOD. Wilden 14, 1900	
7	11. Patient K's true and correct identity is as follows:	
8	Name: LORENA ESPAILLAT DOB: October 4, 1985	
9		
10	12. Patient L's true and correct identity is as follows:	
11	Name: ANA LOPEZ DOB: July 23, 1979	
12		
13	DATED this 24 th day of June, 2021.	
14	INVESTIGATIVE COMMITTEE OF THI NEVADA STATE BOARD OF MEDICAL	
15		
16	By: AARON B. FRICKE, J.D.	
17	General Counsel 9600 Gateway Drive	
18	Reno, NV 89521	
19	Tel: (775) 688-2559 Email: africke@medboard.nv.gov	
20	Attorney for the Investigative Committee	
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OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners 9600 Gateway Drive Reno, Nevada 89521 (775) 688-2559

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and Complaint

Against:

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TAMMY LYNN HANKINS, PA-C,

Respondent.

Case No. 21-51633-1

FILED

JUL - 1 2021

NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

NOTICE OF ERRATA TO COMPLAINT

The Investigative Committee of the Nevada State Board of Medical Examiners hereby submits the following corrections to its Complaint in Case No. 21-51633-1, filed June 25, 2021, which shall be appended thereto:

- 1. Beginning on page 34, following paragraph 195, the Counts enumerated thereafter shall start with Count XXXI, and continue through to the last Count, LII.
- 2. In Counts I, V, IX, XIII, XVII, XXIII, XXVIII and XXXII, as corrected by this Errata, the citation in each heading shall be to NRS 630.400(1)(d).
- 3. In Counts XXXVI, XL, XLIV, XLVIII, as corrected by this Errata, the citation in each heading shall be to NRS 630.380(1)(c). Likewise, in paragraph 24, the citation shall be to NRS 630.380(1)(c).

DATED, July 1, 2021.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

AARON B. FRICKE, J.D.

General Counsel 9600 Gateway Drive Reno, NV 89521

Tel: (775) 688-2559

Email: africke@medboard.nv.gov
Attorney for the Investigative Committee

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and Complaint

Against:

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TAMMY LYNN HANKINS, PA-C,

Respondent.

Case No. 21-51633-1

FILED

JUL - 6 2021

NEVADA STATE BOARD OF MEDICAL EXAMINERS By:

PROOF OF SERVICE

I, Mercedes Fuentes, Legal Assistant for the Nevada State Board of Medical Examiners, hereby certify that on the 28th day of June, 2021, I sent a filed-stamped copy of the COMPLAINT in this matter to Legal Process Service for personal sevice upon Tammy Lynn Hankins, PA-C, at 3753 Cherry Tree Blvd., Lake Havasu City, Arizona 86406. On the 29th day of June, 2021, Ms. Hankins was personally served with the Complaint. *See* Exhibit 1. Additionally, I mailed by USPS Certified Mail No. 9171969009350255617548, delivered on June 30, 2021, and by Fed Ex, tracking no. 774120126075, delivered on June 29, 2021, a filed-stamped copy of the Complaint and accompanying fingerprinting card and instructions to the same. *See* Exhibit 2 & 3.

DATED this 6th day of July, 2021.

MERCEDES FUENTES

Legal Assistant

OFFICE OF THE GENERAL COUNSEL
Nevada State Board of Medical Examiners
9600 Gateway Drive
Reno, Nevada 89521
(775) 688-2559

INDEX OF EXHIBITS

NO.	NAME	NO. OF PAGES
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2.	USPS Proof of Delivery for 9171969009350255617548	1
3.	Fed Ex Proof of Delivery for 774120126075	1

EXHIBIT 1

EXHIBIT 1

335

AFFT Nevada State Board of Medical Examiners Aaron B. Fricke, J.D. 9600 Gateway Drive Reno, NV 89521 State Bar No.: Attorney(s) for: Investigative Committee

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

Case No.:

21-51633-1

In the Matter of Charges and Complaint Against:

Dept. No.:

Tammy Lynn Hankins, PA-C

Date: Time:

Respondent(s)

AFFIDAVIT OF SERVICE

Patricia Gable, being duly sworn deposes and says: That at all times herein affiant was and is a citizen of the United States, over 18 years of age and not a party to or interested in the proceeding in which this affidavit is made. The affiant received 1 copy(ies) of the Complaint on the 28th day of June, 2021 and served the same on the 29th day of June, 2021 at 10:30 am by serving to Respondent, Tammy Lynn Hankins, PA-C by personally delivering and leaving a copy with Mason (Caucasian male, 5'7", 140 lbs., brown hair, 15 years old), son, a person of suitable age and discretion residing at the Respondent's usual place of abode located at 3753 Cherry Tree Blvd., Lake Havasu City, AZ 86406.

Pursuant to NRS 239B.030 this document does not contain the social security number of any person.

I declare under penalty of perjury under the law of the state of Nevada that the foregoing is true and correct.

day of June 2021

Executed this

Signature: - Patricia Gable

Process Server #MH-2021-00006

WorkOrderNo 2104637



EXHIBIT 2

EXHIBIT 2

USPS Tracking®

FAQs >

Track Another Package +

Tracking Number: 9171969009350255617548

Remove X

Your item was delivered to an individual at the address at 11:39 am on June 30, 2021 in LAKE HAVASU CITY, AZ 86406.

Oblivered, Left with Individual

June 30, 2021 at 11:39 am LAKE HAVASU CITY, AZ 86406 Feedback

Get Updates ✓

Text & Email Updates	~
Return Receipt Electronic	~
Tracking History	~
Product Information	~

See Less ∧

Can't find what you're looking for?

EXHIBIT 3

EXHIBIT 3



Dear Customer,

The following is the proof-of-delivery for tracking number: 774120126075

Delivery Information:

Status:

Delivered

Signed for by:

T.HANKINS

Service type:

FedEx 2Day

Special Handling:

Deliver Weekday; Residential Delivery; Adult Signature Required

Delivery date:

Delivered To:

Delivery Location:

LAKE HAVASU CITY, AZ,

Jun 29, 2021 14:20

Residence

Shipping Information:

Tracking number:

774120126075

Ship Date:

Jun 28, 2021

Weight:

1.0 LB/0.45 KG

Recipient:

LAKE HAVASU CITY, AZ, US,

Shipper:

Reno, NV, US,

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and Complaint

6 | Against:

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TAMMY LYNN HANKINS, PA-C,

|| Respondent.

Case No. 21-51633-1

FILED

JUL 19 2021

NEVADA STATE BOARD OF MEDICAL EXAMINERS

PROOF OF SERVICE

I, Mercedes Fuentes, Legal Assistant for the Nevada State Board of Medical Examiners, hereby certify that on the 1st day of July, 2021, I sent a filed-stamped copy of the **NOTICE OF ERRATA TO COMPLAINT** in this matter via Fed Ex, tracking number 774156468416, signature required, to Tammy Lynn Hankins, PA-C, at 3753 Cherry Tree Blvd., Lake Havasu City, Arizona 86406. The Fed Ex parcel was attempted to be delivered several times, however signature was unable to be completed and therefore on July 12, 2021, the parcel was scheduled to be returned to sender. *See* Exhibit 1. Additionally, on July 13, 2021, I mailed by USPS, Certified Mail No. 9171969009350255617647, return receipt requested, a copy of the Notice of Errata to Complaint to the same, delivered on July 17, 2021. *See* Exhibit 2.

DATED this 19th day of July, 2021.

MERCEDES FUENTES

Legal Assistant

OFFICE OF THE GENERAL COUNSEL
Nevada State Board of Medical Examiners
9600 Gateway Drive
Reno, Nevada 89521
(775) 688-2559

INDEX OF EXHIBITS

NO.	NAME	NO. OF PAGES
1.	Fed Ex Tracking for 774156468416	4
2.	USPS Proof of Delivery for 9171969009350255617647	4

EXHIBIT 1

EXHIBIT 1



After printing this label:

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.

2. Fold the printed page along the horizontal line.

3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com.FedEx will not

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com.FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery,misdelivery,or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim.Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental,consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss.Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our ServiceGuide. Written claims must be filed within strict time limits, see current FedEx Service Guide.



TRACK ANOTHER SHIPMENT

7741 5646 8416





ADD NICKNAME

Your package requires a signature for delivery. If you're not home to receive the package, we may route your package to a nearby location for you to pick up. Register or log in to FedEx Delivery Manager® to manage your delivery.



Unable to deliver shipment, returned to shipper Recommended action: No action is required. The package is being returned to the shipper.

No scheduled delivery date available at this time.

Scheduled delivery: Pending



DELIVERY EXCEPTION

LAKE HAVASU CITY, AZ

GET STATUS UPDATES

Adult signature required ③

Want to know when your package will arrive?

See your estimated delivery time with FedEx Delivery Manager. Sign up or Log in

FROM

ТО

Reno, NV US

LAKE HAVASU CITY, AZ US

MANAGE DELIVERY ~

Travel History

TIME ZONE Local Scan Time

Monday, July 12, 2021

7/19/2021		Detailed Tracking
10:43 AM	LAKE HAVASU CITY, AZ	Returning package to shipper Return tracking number 774233972068
8:46 AM	LAKE HAVASU CITY, AZ	At local FedEx facility
Saturday, July 10), 2021	
8:49 AM	LAKE HAVASU CITY, AZ	At local FedEx facility
Friday, July 9, 202	21	
9:36 AM	LAKE HAVASU CITY, AZ	At local FedEx facility
Thursday, July 8,	2021	
5:49 PM	LAKE HAVASU CITY, AZ	At local FedEx facility
Wednesday, July	7, 2021	
5:50 PM	LAKE HAVASU CITY, AZ	At local FedEx facility
3:02 PM	LAKE HAVASU CITY, AZ	Delivery exception Adult recipient unavailable (age and required identification vary by country)
12:09 PM	LAKE HAVASU CITY, AZ	Delivery exception Adult recipient unavailable (age and required identification vary by country)
10:53 AM	LAKE HAVASU CITY, AZ	On FedEx vehicle for delivery
10:15 AM	LAKE HAVASU CITY, AZ	At local FedEx facility
Tuesday, July 6, 2	2021	
5:21 PM	LAKE HAVASU CITY, AZ	At local FedEx facility
10:52 AM	LAKE HAVASU CITY, AZ	Delivery exception Adult recipient unavailable (age and required identification vary by country)
9:13 AM	LAKE HAVASU CITY, AZ	On FedEx vehicle for delivery
8:49 AM	LAKE HAVASU CITY, AZ	At local FedEx facility
8:27 AM	LAKE HAVASU CITY, AZ	At local FedEx facility
Saturday, July 3, 2	2021	
10:06 AM	LAKE HAVASU CITY, AZ	At local FedEx facility
8:44 AM	LAKE HAVASU CITY, AZ	At local FedEx facility
Friday, July 2, 202	21	
5:32 PM	LAKE HAVASU CITY, AZ	At local FedEx facility
3:35 PM	LAKE HAVASU CITY, AZ	Delivery exception Adult recipient unavailable (age and required identification vary by country)

7/19/2021		Detailed Tracking
11:53 AM	LAKE HAVASU CITY, AZ	Delivery exception Adult recipient unavailable (age and required identification vary by country)
10:37 AM	LAKE HAVASU CITY, AZ	On FedEx vehicle for delivery
10:25 AM	LAKE HAVASU CITY, AZ	At local FedEx facility
4:15 AM	PHOENIX, AZ	At destination sort facility
2:44 AM	OAKLAND, CA	Departed FedEx hub
Thursday, July 1, 202	1	
9:26 PM	OAKLAND, CA	Arrived at FedEx hub
6:10 PM	RENO, NV	Left FedEx origin facility
4:30 PM	RENO, NV	Picked up
1:41 PM		Shipment information sent to FedEx

Shipment Facts

TRACKING NUMBER	SERVICE	DOOR TAG NUMBER
7741 5646 8416	FedEx Priority Overnight	DT106159043991, DT106159043833
WEIGHT	TOTAL PIECES	TOTAL SHIPMENT WEIGHT
0.5 lbs / 0.23 kgs	1	0.5 lbs / 0.23 kgs
TERMS	PACKAGING	SPECIAL HANDLING SECTION
Shipper	FedEx Envelope	Deliver Weekday, Residential Delivery, Adult Signature Required
SHIP DATE	SIGNATURE SERVICES	STANDARD TRANSIT
7/1/21 ③	Adult signature required ?	7/2/21 by 12:00 pm ②

SCHEDULED DELIVERY

Pending

EXHIBIT 2

EXHIBIT 2



July 19, 2021

Dear Mercedes Fuentes:

The following is in response to your request for proof of delivery on your item with the tracking number: **9171 9690 0935 0255 6176 47**.

Item Details

Status: Delivered, Left with Individual

Status Date / Time: July 17, 2021, 12:35 pm

Location: LAKE HAVASU CITY, AZ 86406

Postal Product: First-Class Mail®
Extra Services: Certified Mail™

Return Receipt Electronic

Recipient Signature

Signature of Recipient:

St 123

Address of Recipient:

Note: Scanned image may reflect a different destination address due to Intended Recipient's delivery instructions on file.

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely, United States Postal Service® 475 L'Enfant Plaza SW Washington, D.C. 20260-0004

FAQs >

Track Another Package +

Tracking Number: 9171969009350255617647

Remove X

Your item was delivered to an individual at the address at 12:35 pm on July 17, 2021 in LAKE HAVASU CITY, AZ 86406.

Oblivered, Left with Individual

July 17, 2021 at 12:35 pm LAKE HAVASU CITY, AZ 86406 reedbac

Get Updates ✓

Text & Email Updates

Return Receipt Electronic

^



Your Proof of Delivery record is complete and will be processed shortly.

https://tools.usps.com/go/TrackConfirmAction?tRef=fullpage&tLc=2&text28777=&tLabels=9171969009350255617647%2C&tABt=false

Your confirmation will be sent to the following:

fuentesm@medboard.nv.gov

Tracking History

^

July 17, 2021, 12:35 pm Delivered, Left with Individual LAKE HAVASU CITY, AZ 86406

Your item was delivered to an individual at the address at 12:35 pm on July 17, 2021 in LAKE HAVASU CITY, AZ 86406.

July 16, 2021, 9:13 pm
Departed USPS Regional Facility
LAS VEGAS NV DISTRIBUTION CENTER

July 16, 2021, 2:21 pm

Arrived at USPS Regional Facility

LAS VEGAS NV DISTRIBUTION CENTER

July 15, 2021, 11:36 pm
Departed USPS Regional Facility
SAN BERNARDINO CA DISTRIBUTION CENTER

July 15, 2021, 11:00 am

Arrived at USPS Regional Facility
SAN BERNARDINO CA DISTRIBUTION CENTER

July 14, 2021
In Transit to Next Facility

July 13, 2021, 7:49 pm Departed Post Office RENO, NV 89510

July 13, 2021, 6:59 pm Acceptance RENO, NV 89510

Product Information



See Less ∧

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs

Feedback

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * *

In the Matter of Investigation of:

TAMMY LYNN HANKINS, PA-C,

License No. PA2277.

Case No. 21-51633-1

FILED

JUL 20 2021

NEVADA STATE BOARD OF MEDICAL EXAMINERS

ORDER OF SUMMARY SUSPENSION

The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners (Board) hereby **IMMEDIATELY SUMMARILY SUSPENDS** the license of Tammy Lynn Hankins, PA-C, License No. PA2277 (Licensee) from the practice of medicine, pursuant to the IC's authority provided in NRS 630.326(1). The IC has reasonably determined that the health, safety and welfare of the public and patients served by Licensee are at risk of imminent and continued harm, based upon the following preliminary findings:

- 1. Licensee is a physician assistant licensed to practice medicine as a physician assistant in the State of Nevada (License No. PA2277). The Board issued her license on or about March 6, 2020.
- 2. On June 25, 2021, the IC filed its formal Complaint in Case No. 21-51633-1 (Complaint), alleging fifty-two (52) violations of the Nevada Medical Practice Acts, including: eight (8) counts of Unlicensed Practice of Medicine, Counts I, V, IX, XIII, XVII, XXIII, XXVIII and XXXII; twelve (12) counts of Malpractice, Counts II, VI, X, XIV, XVIII, XXIV, XXIX, XXXIII, XXXVII, XLI, XLV and XLIX; five (5) counts of Fraudulent, Illegal, Unauthorized and Otherwise Inappropriate Prescribing of Schedule IV Controlled Substance, Counts III, VII, XI, XV, XIX; twelve (12) counts of Disreputable Conduct, Counts IV, VIII, XII, XVI, XX, XXV, XXXIV, XXXIX, XLIII, XLVII and LI; two (2) counts of Illegal Injection of Botox or

The Investigative Committee of the Nevada State Board of Medical Examiners is composed of Board members Victor M. Muro, M.D., Chair, Weldon Havins, M.D., J.D., and Maggie Arias-Petrel, Public Member.

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Xeomin, Counts XXI and XXVI; three (3) counts of Illegal Injection of Versa, Counts XXII,
XXVII and XXXI; one (1) count of Fraud and Misrepresentation in Obtaining a License, Count
XXXV; four (4) counts of Performing Medical Services Without A Supervising Physician, Counts
XXVI, XL, XLIV and XLVIII; four (4) counts of Administration of Conscious Sedation at an
Unaccredited and Unpermitted Facility, Counts XXXVIII, XLII, XLVI and L; one (1) count of
Continual Failure to Practice Medicine Properly, Count LII.

- 3. Additionally, the Board is currently investigating complaints of alleged malpractice and serious patient injury caused by Licensee, in furtherance of which the IC has issued an Order to Produce Healthcare Records ("Order for Records") pursuant to its authority pursuant to NRS 630.311(1), and issued an allegation letter, both of which lawfully command a response from Licensee.
- 4. Pursuant to NRS 630.254, Licensee is required to maintain a permanent mailing address with the Board to which all communications from the Board to the licensee must be sent.
- 5. The IC sent its allegation letter to Licensee by USPS Regular Mail addressed to Licensee's address of record on or about December 17, 2020.
- 6. The IC sent its allegation letter and Order for Records to Licensee by USPS Regular Mail addressed to Licensee's address of record on or about January 29, 2021.
- 7. The IC sent its allegation letter and Order for Records to Licensee by USPS Certified Mail addressed to Licensee's address of record on or about February 26, 2021, which was certified delivered on March 1, 2021.
- 8. The IC sent its allegation letter and Order for Records to Licensee via email to the email address on file with the Board on or about March 19, 2021.
- 9. The IC sent its allegation letter and Order for Records to Licensee by FedEx Ground to Licensee's address of record on or about June 28, 2021, which was delivered on July 1, 2021.
- Licensee has failed to comply with the IC's allegation letter and lawful Order for 10. Records, which failure is impeding the IC's investigation.

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2	knowing and willful.	
3	12. Licensee's conduct, as alleged herein and in the Complaint, is not only	
4	unprofessional, but demonstrates an intent to evade the Board's investigatory processes and to	
5	conceal illegal activities that endanger the public safety.	
6	13. Licensee's conduct is wholly incompatible with maintaining an active license to	
7	practice medicine as a physician assistant in the State of Nevada.	
8	14. Based upon the foregoing, on July 19, 2021, this IC has reasonably determined that	
9	the health, safety, or welfare of the public and any patient served by Licensee is at risk of	
10	imminent and continued harm.	
11	Accordingly, pursuant to NRS 630.326(1):	
12	IT IS HEREBY ORDERED that the license to practice medicine, as a physician	
13	assistant, in the State of Nevada of Tammy Lynn Hankins, PA-C (License No. PA2277), is	
14	HEREBY SUSPENDED until further order of the IC or the Board; and	
15	IT IS HEREBY FURTHER ORDERED that pursuant to NRS 630.326(2), a hearing on	
16	this matter shall be set for September 20, 2021, 9:00 a.m., at the Board's office located at	
17	9600 Gateway Drive, Reno, NV, 89521 to determine whether this suspension may continue,	
18	unless the parties mutually agree in writing to a different date and/or time.	
19	DATED this May of July, 2021.	
20		
21	INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS	
22	By: () M Mund Mo	
23	By: VICTOR M. MURO, M.D.	
24	Chairman for the Investigative Committee	
25		
~		

On information and belief, Licensee's failure to comply with the IC's Order is

9600 Gateway Drive Reno, Nevada 89521

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and Complaint

Against:

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TAMMY LYNN HANKINS, PA-C,

Respondent.

Case No. 21-51633-1

FILED

JUL 2 n 2021

NEVADA STATE BOARD OF MEDICAL EXAMINERS

FIRST AMENDED COMPLAIN

The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners (Board), by and through Aaron Bart Fricke, J.D., General Counsel and attorney for the IC, having a reasonable basis to believe that Tammy Lynn Hankins, PA-C, (Respondent) violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act), hereby issues its First Amended Complaint, stating the IC's charges and allegations as follows:

RESPONDENT'S HISTORY OF CRIMINAL AND UNPROFESSIONAL CONDUCT

1. On or about March 1, 2012, in the Superior Court of the State of Arizona, in and for the County of Mohave (Arizona Court), in Case No. CR-2012-00287, a Grand Jury indicted Respondent on five (5) criminal counts of violations of Arizona law, including COUNT 1: FRAUDULENT SCHEMES AND ARTIFICES, CLASS 2 FELONY; COUNT 2: OBTAIN OR PROCURE THE ADMINISTRATION OF A NARCOTIC DRUG BY FRAUD, CLASS 3 FELONY; COUNT 3: OBTAINING A DANGEROUS DRUG BY FRAUD, CLASS 3 FELONY; COUNT 4: ATTEMPTED OBTAINING A DANGEROUS DRUG BY FRAUD, CLASS 4 FELONY; COUNT 5: ATTEMPTED OBTAINING A DANGEROUS DRUG BY FRAUD, CLASS 4 FELONY.

¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal Complaint was authorized for filing, was composed of Board members Victor M. Muro, M.D., Chair, Ms. April Mastroluca and Weldon Havins, M.D., J.D.

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Arizona Case History

2. On or about November 28, 2012, the Arizona Regulatory Board of Physician Assistants ("Arizona Board"), in Case No. PA-11-0127A, found Respondent, who had been the holder of a license to practice medicine as a physician assistant in the State of Arizona (License No. 2228), guilty of unprofessional conduct. Specifically, the Arizona Board had received information from a pharmacist alleging that Respondent had been recklessly writing prescriptions without supervision, writing abnormally large quantities of controlled drugs, and writing outside her scope of practice. Further, Respondent's supervising physician (SP) had terminated the supervision relationship with Respondent on September 13, 2011, yet Respondent proceeded to perform healthcare tasks without an SP's direction or supervision from September 13, 2011, through October 25, 2011, according to the date of the last prescribed controlled substance on the Pharmacy Monitoring Profile (which is a similar database in the State of Arizona to the Nevada Prescription Monitoring Program). On October 26, 2011, Respondent wrote two (2) prescriptions for controlled substances on a prescription pad that contained her SP's, name and DEA number. The prescriptions were issued after the SP terminated his supervisory relationship with Respondent. Arizona Board staff determined that the prescription pads did not contain Respondent's current SP information. In addition, Respondent failed to timely appear for an investigational interview with Arizona Board staff to address the quality of care issues in this case on four (4) occasions. Arizona Board staff found that Respondent failed to cooperate with the Arizona Board's investigation. A Medical Consultant (MC) reviewed the medical records of certain patients treated by Respondent to determine the quality of care provided by Respondent.

Patient JC

3. Respondent treated Patient JC for weight loss and removal of skin lesions, and Respondent started the patient on Levoxyl and Prozac. Patient JC continued to be seen by Respondent for chronic pain, and received prescriptions for Phentermine, Vicodin, Valium, Xanax and Oxycodone during the course of treatment with Respondent. Patient JC's prescriptions were reportedly stolen in March 2011. Patient JC later underwent Fraxel treatment along with Mesotherapy that reportedly required continuation of her pain medications. By October 2011,

Patient JC had not established herself with a pain specialist and again claimed that her prescriptions were stolen.

Patient MW

4. Another patient, Patient MW, received medical care in Respondent's office for a Fraxel treatment on August 23, 2011. There is no record of prescriptions written for this patient in the chart provided. Lastly, a police report made by Respondent's former SP alleged that Respondent had written thirty-nine (39) prescriptions for Patient MW between June and September of 2011, including Oxycodone, Hydrocodone, Valium, Phentermine, Xanax, and Endocet. In particular, Respondent wrote a prescription for Oxycodone 5 mg, 100 ct., and Diazepam 10 mg, 100 ct., with five refills on June 20, 2011. The record of all pharmacy prescriptions written by Respondent from November 2010 to November 2011 includes over 900 prescriptions, approximately 99% of which written by Respondent during this time period were for Phentermine, Diazepam, Alprazolam, Hydrocodone, Oxycodone, Endocet and Carisoprodol. Of particular concern to the care of Patient MW were prescriptions for Hydrocodone-acetaminophen 7.5-750 mg, 100 ct., with five (5) refills, and prescriptions for Oxycodone-acetaminophen 10-325 mg, 100 ct., Alprazolam 1 mg, 90 ct., with two (2) refills, and Meperidine 50 mg., 40 ct., on January 18, 2011.

Arizona Board Discipline

- 5. The Arizona Board determined that the standard of care when prescribing medications for patients requires documentation of the medications prescribed, indications for use and monitoring of the amounts being prescribed and noted in the medical record. The Arizona Board determined that Respondent deviated from the standard of care by inappropriately prescribing medications for patients, and that the excess prescribing of these medications can lead to addiction or overdose with a possible fatal outcome.
- 6. For the foregoing misconduct, the Arizona Board found Respondent guilty of unprofessional conduct pursuant to Arizona Revised Statute (ARS) §32-2501(18)(i) ("prescribing or dispensing controlled substances or prescription-only drugs for which the physician assistant is not approved or in excess of the amount authorized pursuant to this chapter"); ARS §32-2501(18)(j) ("any conduct or practice that is or might be harmful or dangerous to 'the health of a patient or the

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public"); ARS § 32-2501 (18)(p) ("failing or refusing to maintain adequate records on a patient"), and ARS § 32-2501(18)(z) ("failing to furnish legally requested information to the [Arizona Board] or its Investigator in a timely manner."). The Arizona Board also found that a practice restriction was needed in order to protect the public, and ordered that Respondent be issued a Letter of Reprimand, placed on probation for one (1) year with additional conditions and restrictions.

Respondent's Arizona License Renewal

7. Respondent's license to practice medicine as a physician assistant in the State of Arizona (License No. 2228) was due for renewal by June 1, 2013; Respondent did not renew, and her Arizona license expired by operation of law on May 20, 2014.

Criminal Conduct by Respondent in Arizona

- 8. On or about September 14, 2013, the Arizona Court found that Respondent had knowingly, intelligently and voluntarily pled guilty to the offense of: COUNT 3: OBTAINING A DANGEROUS DRUG BY FRAUD, CLASS 3 FELONY. On or about October 2, 2013, the Arizona Court entered its judgment finding Respondent guilty of the foregoing charge, and sentenced Respondent to a suspended imposition of sentence and placing the Defendant on probation for a period of four years commencing October 2, 2013, among other conditions of probation.
- 9. On or about January 17, 2014, pursuant to a Petition to Revoke Probation, the Arizona Court ordered that Respondent be held without bond pending hearing on said petition.
- 10. On or about August 11, 2014, the Arizona Court found Respondent guilty of violating her probation for the following crimes: OBTAINING A DANGEROUS DRUG BY FRAUD, CLASS 3 FELONY, and SEXUAL CONDUCT WITH A MINOR, CLASS 6 FELONY. For the first crime, Respondent was sentenced to two and one-half years with the Arizona Department of Corrections, as a minimum sentence, to date from August 11, 2014, and was given credit for two hundred eight (208) days served prior to sentencing. For the second crime, Respondent as sentenced to one (1) additional year of incarceration, that sentence to run consecutive to the other.

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Respondent's Application for a Physician Assistant License in the State of Nevada

- 11. On or about September 24, 2019, Respondent applied to the Board for a license to practice medicine as a physician assistant in the State of Nevada. On March 6, 2020, the Board met for its regularly scheduled public meeting, and considered Respondent's application in open session, at which time, Respondent informed the Board that she had not practiced clinical medicine since she had been incarcerated, and stated that, though she had secured a job at a medical spa, and planned in the future to perform plastic surgery injections, in-office procedures, excisions, and assisting with different procedures, nevertheless, she had not done so yet and the aforementioned job offer was contingent upon her obtaining a license in Nevada. At the meeting, individual Board members expressed concerns regarding her history of criminal and unprofessional conduct, and concerns about the fact that Respondent had not practiced clinical medicine since her incarceration. Nevertheless, considering that Respondent had recently recertified as a physician assistant with National Commission on Certification of Physician Assistants, which demonstrated to some extent her current clinical competency, the Board approved her application and granted her a license to practice medicine.
- 12. The Board issued to Respondent an active license to practice medicine as a physician assistant in the State of Nevada (License No. PA2277) on March 6, 2020.
- 13. Respondent was not licensed to practice medicine as a physician assistant in the State of Nevada before March 6, 2020.
- 14. Respondent does not hold an active Drug Enforcement Agency (DEA) registration, and has not held a valid registration since 2016. Respondent also does not hold and has never held an active license or registration with the Nevada State Board of Pharmacy (NSBOP).

II. STATEMENT OF LAW

- 15. Pursuant to NRS 630.020(1)-(4), the "Practice of medicine" means:
 - 1. To diagnose, treat, correct, prevent or prescribe for any human disease, ailment, injury, infirmity, deformity or other condition, physical or mental, by any means or instrumentality, including, but not limited to, the performance of an autopsy.
 - 2. To apply principles or techniques of medical science in the diagnosis or the prevention of any such conditions.

- 3. To perform any of the acts described in subsections 1 and 2 by using equipment that transfers information concerning the medical condition of the patient electronically, telephonically or by fiber optics, including, without limitation, through telehealth, from within or outside this State or the United States.
- 4. To offer, undertake, attempt to do or hold oneself out as able to do any of the acts described in subsections 1 and 2.
- 16. NRS 630.400(1)(d) provides that it is unlawful to practice medicine without being licensed under NRS Chapter 630.
- 17. Pursuant to NRS 630.400(2) and NRS 193.130(c) and (d), the unlawful practice of medicine is a felony, punishable by imprisonment in the state prison for a minimum term of not less than one (1) year and a maximum term of not more than five (5) years.
- 18. NAC 630.380(1)(m) provides that violating any provision of NRS 630.301 to 630.3065, is grounds for initiating disciplinary action against a physician assistant.
- 19. NAC 630.380(1)(f) provides that malpractice in the performance of medical services is grounds for initiating disciplinary action against a physician assistant.
- 20. NRS 630.301(4) provides that malpractice is grounds for initiating disciplinary action against a physician.
- 21. Pursuant to NAC 630.375(2) a physician assistant shall not perform medical services without supervision from his or her supervising physician, except in life-threatening and emergency situations.
- 22. Pursuant to NAC 630.370, a supervising physician is responsible for all the medical activities of his or her physician assistant and shall ensure, among other obligations, that the physician assistant performs only those medical services which have been approved by his or her supervising physician, there is strict compliance with the regulations of the State Board of Pharmacy regarding controlled substances, poisons, dangerous drugs or devices, and that the supervising physician is available at all times that his or her physician assistant is performing medical services to consult with his or her assistant.

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23. Pursuant to NAC 630.380(1)(a), willfully and intentionally making a false or fraudulent statement in applying for a license is grounds for initiating disciplinary action against a physician assistant.

- 24. Pursuant to NAC 630.380(1)(c), performing medical services otherwise than in a life-threatening or emergency situation, and at the direction or under the supervision of the supervising physician of the physician assistant is grounds for initiating disciplinary action against a physician assistant.
- 25. Pursuant to NRS 630.3065(2)(c), knowingly or willfully failing to comply with or provision of NRS Chapter 630 is grounds for initiating disciplinary action against a physician.
- 26. NAC 630.040 defines malpractice as "the failure of a physician, in treating a patient, to use the reasonable care, skill, or knowledge ordinarily used under similar circumstances."
- 27. Pursuant to 21 Code of Federal Regulations (CFR) §1306.04(a)-(b) and NRS 453.381, a physician or physician assistant may prescribe or administer controlled substances only for a legitimate medical purpose and in the usual course of his or her professional practice. The responsibility for the proper prescribing and dispensing of controlled substances is upon the prescribing practitioner, and a prescription may not be issued in order for an individual practitioner to obtain controlled substances for supplying the individual practitioner for the purpose of general dispensing to patients. 21 CFR §1306.04(a)-(b).
- 28. Pursuant to NRS 630.3062(1)(h), fraudulent, illegal, unauthorized or otherwise inappropriate prescribing, administering or dispensing of a controlled substance listed in schedule II, III or IV is grounds for initiating disciplinary action or denying licensure.
- 29. Pursuant to NRS 449.442(1)-(2), an office of a physician or a facility that provides health care, other than a medical facility (as specifically defined in NRS 449.0151), must obtain a permit pursuant to NRS 449.443 from the Nevada State Board of Health, and must maintain current accreditation by a nationally recognized organization approved by the Nevada State Board of Health, before offering to a patient a service of general anesthesia, conscious sedation or deep sedation.

30. Pursuant to NRS 630.306(1)(o), failure to comply with the requirements of NRS 630.373 is grounds for initiating discipline or denying licensure.

- 31. Pursuant to NRS 630.373(1), a physician shall not administer or supervise directly the administration of general anesthesia, conscious sedation or deep sedation to patients unless the general anesthesia, conscious sedation or deep sedation is administered: (a) in an office of a physician or osteopathic physician which holds a permit pursuant to NRS 449.435 to 449.448, inclusive; (b) in a facility which holds a permit pursuant to NRS 449.435 to 449.448, inclusive; (c) in a medical facility as that term is defined in NRS 449.0151; or (d) outside of the State of Nevada.
- 32. For the purposes of NRS 630.373, "conscious sedation" means a minimally depressed level of consciousness, produced by a pharmacologic or nonpharmacologic method, or a combination thereof, in which the patient retains the ability independently and continuously to maintain an airway and to respond appropriately to physical stimulation and verbal commands. NRS 449.436.
- 33. Pursuant to NRS 453.021, "administer" means the direct application of a controlled substance, whether by injection, inhalation, ingestion or any other means, to the body of a patient or research subject by: (1) a practitioner or, in the practitioner's presence, by the practitioner's authorized agent; or (2) the patient or research subject at the direction and in the presence of the practitioner.
- 34. Pursuant to NRS 454.217, a person shall not inject a neuromodulator that is derived from Clostridium botulinum or is biosimilar to or the bioequivalent of such a neuromodulator unless (1) the person is a physician or physician assistant licensed pursuant to NRS Chapter 630, a qualified dentist licensed pursuant to NRS 631.391, a registered nurse or advanced practice registered nurse, a physician or physician assistant licensed pursuant to NRS Chapter 633, or a qualified podiatric physician to NRS 635.086, (2) it is within his or her scope of practice, and (3) the injection occurs at a location that is either a medical facility, as defined in NRS 449.0151, or at the office of a physician or physician assistant licensed pursuant to chapter 630 or 633 of NRS, dentist, advanced practice registered nurse or podiatric physician.

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35. A person who violates any portion of NRS 454.217 is guilty of a misdemeanor. NRS 454.356

- 36. Pursuant to NRS 629.086, a person shall not inject dermal or soft tissue fillers unless (1) the person is a physician or physician assistant licensed pursuant to NRS Chapter 630, a qualified dentist licensed pursuant to NRS 631.391, a registered nurse or advanced practice registered nurse, a physician or physician assistant licensed pursuant to NRS Chapter 633, or a qualified podiatric physician to NRS 635.086, (2) it is within his or her scope of practice, and (3) the injection occurs at a location that is either a medical facility, as defined in NRS 449.0151, or at the office of a physician or physician assistant licensed pursuant to chapter 630 or 633 of NRS, dentist, advanced practice registered nurse or podiatric physician.
- 37. A person who violates any portion of NRS 629.086 is guilty of a misdemeanor. NRS 629.086(3).
- 38. Pursuant to NRS 630.306(1)(u), the failure to comply with the provisions of NRS 454.217 or 629.086 is grounds for initiating disciplinary action against a physician.
- 39. NAC 630.301(9) provides that engaging in conduct that brings the medical profession into disrepute is grounds for initiating disciplinary action against a physician assistant.

III. RESPONDENT'S UNLICENSED PRACTICE OF MEDICINE AT VIDA SPA MALPRACTICE, DISREPUTABLE CONDUCT AND RELATED VIOLATIONS OF THE NEVADA MEDICAL PRACTICE ACT.

- 40. Vida Spa LLC, a Nevada Limited Liability Company, formed July 22, 2016. managed by Gisselle Platfoot ("Vida Spa"), and also doing business as "Vida Spa" and "Vita Medical Spa Las Vegas," is a self-described "medical spa" located at 3225 S Rainbow Blvd #107 and/or #206, Las Vegas, NV 89146.
- 41. Vida Spa LLC, is licensed in Clark County, Nevada, under Clark County Business License No. 2003447.081-172, under the business category of "Cosmetology Establishment -Other Services." The owners listed under this license are Art Matrix, Inc. and Gisselle Platfoot.
- 42. Gisselle Platfoot, manager of Vida Spa LLC, at all times relevant to this complaint, did not hold a license to practice any healing art as a "provider of health care," as defined in NRS 629.031, from any occupational licensing board in the State of Nevada.

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- 43. Vida Spa is "a facility that provides health care, other than a medical facility" (NRS 449.442). Neither Respondent, Vida Spa, nor Gisselle Platfoot held, or currently holds, the requisite permit, pursuant to NRS 449.442, to perform general anesthesia, conscious sedation or deep sedation. Additionally neither Respondent, Vida Spa, nor Gisselle Platfoot held a current accreditation by a nationally recognized organization approved by the Nevada State Board of Health.
- 44. At all times relevant to this Complaint, Vida Spa was not a "medical facility," as defined in NRS 449.0151, and not "the office" of a physician or physician assistant licensed pursuant to NRS chapter 630 or 633, qualified dentist, advanced practice registered nurse or podiatric physician, as provided in NRS 454.217.
- 45. On March 24, 2021, the NSBOP issued a Citation and Order to Cease and Desist (Platfoot Citation) to Vida Spa LLC and Gisselle Platfoot, whereby the NSBOP determined that Vida Spa LLC and Gisselle Platfoot were possessing, administering, prescribing and/or dispensing controlled substances and/or dangerous drugs for Nevada patients from Vida Spa in violation of federal and state law. Specifically, the Platfoot Citation states that Vida Spa and Gisselle Platfoot did not have a dispensing registration and are therefore prohibited from possessing, dispensing and/or administering controlled substances and/or dangerous drugs. The Platfoot Citation finds that Vida Spa and Gisselle Platfoot violated, attempted to violate, assisted or abetted in the violation of or conspired to violate, without limitation, NRS 453.226, NRS 453.316, NRS 453.321(1)(a), NRS 453.331(1)(c)(d)(t)&(i), NRS 453.381(1), NRS 453.401(1)(a), NRS 639.0727, NRS 639.100(1), NRS 639.23505, NRS 639.281, NRS 639.2813, NRS 639.310, NAC 639.742, 21 U.S.C. § 822(a)(2), 21 U.S.C. § 823(f), 21 U.S.C. § 841(a), 21 U.S.C. § 842(a), 21 U.S.C. § 846 and 21 CFR §§ 1306.03-1306.05. The Platfoot Citation orders Vida Spa LLC and Gisselle Platfoot, pursuant to NRS 639.2895(1), to immediately cease and desist possessing, administering, prescribing and/or dispensing controlled substances for Nevada patients, and also assessed an administrative fine of five thousand dollars (\$5,000.00) pursuant NRS 639.2895(3).

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A. Respondent's Treatment of Patient A Without a License

- 46. Patient A² was a fifty-seven (57) year-old female at the time of the events at issue.
- 47. At all times relevant to Respondent's treatment of Patient A, the so-called "medical director" of Vida Spa was Sherman Washington, Jr., M.D.
- On October 9, 2019, Respondent, who did not have her own DEA registration and 48. controlled substance license issued by the NSBOP, utilized the prescribing credentials of Sherman Washington, Jr., M.D., to issue fraudulent prescriptions to Patient A for Tramadol (a Schedule IV Controlled Substance) 50 mg tablets, 24 ct. for days, and Diazepam (a Schedule IV Controlled Substance) 10 mg tablets, 8 ct. for 3 days; these prescriptions were called-in to the pharmacy by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and the prescriptions were filled the same day.
- 49. Respondent instructed Patient A to take Schedule IV controlled substances in a manner that materially deviated from the issued prescriptions; Respondent instructed Patient A to take Tramadol 50mg, 2 tablets, and Diazepam 10 mg, 1 tablet, at 2:00 p.m., on October 10, 2019, for the purpose of conscious sedation for an invasive, surgical liposuction procedure Respondent planned to perform on Patient A at Vida Spa at 3:00 p.m. that day.
- Patient A to deviate from the issued prescription in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal a violation by Vida Spa of NRS 449.442(1)-(2).
- 51. Dr. Washington did not see or treat Patient A, did not direct or supervise Respondent in her treatment of Patient A, and did not specifically direct Respondent to issue prescriptions to Patient A.
- 52. On October 10, 2019, at Vida Spa, at approximately 3:00 p.m., Respondent performed a liposuction procedure on the arms of Patient A. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient A, which Respondent obtained, without a

² Patient A's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint, along with identifying information for all other patients B through L referered to herein.

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patient-specific prescription or an order from a licensed practitioner for Patient A, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.

Respondent was not supervised by any licensed physician while performing this 53. invasive surgical procedure on Patient A at Vida Spa.

COUNT I

NRS 630.400(1)(d) – Unlicensed Practice of Medicine

- 54. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 55. Respondent practiced medicine without a license when she treated Patient A on October 9 and 10, 2019.
- 56. Respondent, having been previously disciplined by the Arizona Board and incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by her subsequent application to the Board for a license to practice medicine in the State of Nevada, among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.
- 57. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT II

NRS 630.301(4) - Malpractice

- 58. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 59. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient A, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient A without first obtaining a license to practice medicine in the State of Nevada, by performing an

invasive surgical procedure on Patient A, by administering tumescent anesthesia to Patient A utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, by issuing fraudulent and illegal prescriptions for controlled substances to Patient A, by instructing Patient A to take controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2), and by treating Patient A without the direct supervision of a licensed physician.

60. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT III

NRS 630.3062(1)(h) – Fraudulent, Illegal, Unauthorized and Otherwise Inappropriate Prescribing of Schedule IV Controlled Substance

- 61. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 62. As demonstrated by, but not limited to, the above-outlined facts, Respondent issued fraudulent, illegal, unauthorized and otherwise inappropriate prescriptions for Schedule IV controlled substances, Tramadol and Diazepam, to Patient A by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient A without first obtaining a license to practice medicine in the State of Nevada, a DEA registration, and a controlled substance license issued by the NSBOP, by issuing fraudulent and illegal prescriptions for these controlled substances to Patient A, by instructing Patient A to take these controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2).
- 63. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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

COUNT IV

NRS 630.301(9) - Disreputable Conduct

- 64. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 65. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, knowingly, willfully and feloniously practicing medicine without first obtaining a license to practice medicine in the State of Nevada, by performing an invasive surgical procedure on Patient A, by administering tumescent anesthesia to Patient A utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, by issuing fraudulent and illegal prescriptions for Schedule IV controlled substances to Patient A, by instructing Patient A to take these controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2), and by treating Patient A without the direct supervision of a licensed physician.
- 66. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

B. Respondent's Treatment of Patient B Without a License

- 67. Patient B was a thirty-one (31) year-old female at the time of the events at issue.
- 68. At all times relevant to Respondent's treatment of Patient B, the so-called "medical director" of Vida Spa was Sherman Washington, Jr., M.D.
- 69. On October 7, 2019, Respondent, who did not have her own DEA registration and controlled substance license issued by the NSBOP, utilized the prescribing credentials of Sherman Washington, Jr., M.D., to issue fraudulent prescriptions to Patient B for Tramadol 50 mg tablets (a Schedule IV Controlled Substance), 20 ct. for 3 days, Promethazine 25 mg tablets, 12 ct. for 2 days, Sulfameth/Trimethprim 800/160 mg tablets, 20 ct. for 10 days; these prescriptions were called-in to the pharmacy by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and the prescriptions were filled the same day.

- 70. Dr. Washington did not see or treat Patient B, did not direct or supervise Respondent in her treatment of Patient B, and did not specifically direct Respondent to issue a prescription to Patient B.
- 71. On October 8, 2019, at Vida Spa, Respondent performed a liposuction procedure on the arms of Patient B. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient B, which Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner for Patient B, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.
- 72. Respondent was not supervised by any licensed physician while performing this invasive surgical procedure on Patient B at Vida Spa.

COUNT V

NRS 630.400(1)(d) – Unlicensed Practice of Medicine

- 73. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 74. Respondent practiced medicine without a license when she treated Patient B on October 7 and 8, 2019.
- 75. Respondent, having been previously disciplined by the Arizona Board and incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by her subsequent application to the Board for a license to practice medicine in the State of Nevada, among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.
- 76. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT VI

NRS 630.301(4) - Malpractice

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

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78. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient B, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient B without first obtaining a license to practice medicine in the State of Nevada, by performing an invasive surgical procedure on Patient B, by administering tumescent anesthesia to Patient B utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, by issuing a fraudulent and illegal prescription for a controlled substances to Patient B, and by treating Patient B without the direct supervision of a licensed physician.

79. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT VII

NRS 630.3062(1)(h) - Fraudulent, Illegal, Unauthorized and Otherwise Inappropriate Prescribing of Schedule IV Controlled Substance

- 80. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 81. As demonstrated by, but not limited to, the above-outlined facts, Respondent issued a fraudulent, illegal, unauthorized and otherwise inappropriate prescription for a Schedule IV controlled substances, Tramadol, to Patient B by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient B without first obtaining a license to practice medicine in the State of Nevada, a DEA registration, and a controlled substance license issued by the NSBOP, and by issuing a fraudulent and illegal prescription for a Schedule IV controlled substances to Patient B.
- 82. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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COUNT VIII

NRS 630.301(9) - Disreputable Conduct

- 83. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 84. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, knowingly, willfully and feloniously practicing medicine without first obtaining a license to practice medicine in the State of Nevada, and by performing an invasive surgical procedure on Patient B, by administering tumescent anesthesia to Patient B utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, by issuing a fraudulent and illegal prescription for a Schedule IV controlled substances to Patient B, and by treating Patient B without the direct supervision of a licensed physician.
- 85. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.
 - C. Respondent's Treatment of Patient C Without a License
 - 86. Patient C was a forty-three (43) year-old female at the time of the events at issue.
- 87. At all times relevant to Respondent's treatment of Patient C, the so-called "medical director" of Vida Spa was Sherman Washington, Jr., M.D.
- 88. On October 9, 2019, Respondent, who did not have her own DEA registration and controlled substance license issued by the NSBOP, utilized the prescribing credentials of Sherman Washington, Jr., M.D., to issue fraudulent prescriptions to Patient C for Tramadol (a Schedule IV Controlled Substance) 50 mg tablets, 24 ct. for 3 days, Diazepam (a Schedule IV Controlled Substance) 10 mg tablets, 12 ct. for 4 days, Promethazine 25 mg tablets, 20 ct for 5 days, and Sulfameth/Trimethprim 800/160 mg tablets, 20 ct. for 10 days; these prescriptions were called-in to the pharmacy by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and the prescriptions were filled the same day.
- 89. Respondent instructed Patient C to take the Schedule IV controlled substances in a manner that materially deviated from the issued prescriptions; Respondent instructed Patient C to

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take Tramadol 50mg, 2 tablets, and Diazepam 10 mg, 1 tablet, one hour in advance an invasive, surgical liposuction procedure Respondent planned to perform on Patient C at Vida Spa on October 9, 2019, for the purpose of conscious sedation.

- 90. Respondent wrote the prescriptions for these controlled substances and instructed Patient C to deviate from the issued prescription in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2).
- 91. Dr. Washington did not see or treat Patient C, did not direct or supervise Respondent in her treatment of Patient C, and did not specifically direct Respondent to issue prescriptions to Patient C.
- 92. On October 9, 2019, at Vida Spa, Respondent performed a liposuction procedure on the arms of Patient C. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient C, which Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner for Patient C, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.
- 93. Respondent was not supervised by any licensed physician while performing this invasive surgical procedure on Patient C at Vida Spa.

COUNT IX

NRS 630.400(1)(d) - Unlicensed Practice of Medicine

- 94. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 95. Respondent practiced medicine without a license when she treated Patient C on October 9, 2019.
- 96. Respondent, having been previously disciplined by the Arizona Board and incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by her subsequent application to the Board for a license to practice medicine in the State of Nevada,

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among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.

97. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT X

NRS 630.301(4) - Malpractice

- 98. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 99. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient C, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient C without first obtaining a license to practice medicine in the State of Nevada, by performing an invasive surgical procedure on Patient C, by administering tumescent anesthesia to Patient C utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, by issuing fraudulent and illegal prescriptions for controlled substances to Patient C, by instructing Patient C to take controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2), and by treating Patient C without the direct supervision of a licensed physician.
- 100. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XI

NRS 630.3062(1)(h) - Fraudulent, Illegal, Unauthorized and Otherwise Inappropriate Prescribing of Schedule IV Controlled Substance

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

fraudulent, illegal, unauthorized and otherwise inappropriate prescriptions for Schedule IV controlled substances, Tramadol and Diazepam, to Patient C by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient C without first obtaining a license to practice medicine in the State of Nevada, a DEA registration, and a controlled substance license issued by the NSBOP, by issuing fraudulent and illegal prescriptions for these controlled substances to Patient C, by instructing Patient C to take these controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2).

103. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XII

NRS 630.301(9) – Disreputable Conduct

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

by, among other misconduct, knowingly, willfully and feloniously practicing medicine without first obtaining a license to practice medicine in the State of Nevada, by performing an invasive surgical procedure on Patient C, by administering tumescent anesthesia to Patient C utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, by issuing fraudulent and illegal prescriptions for Schedule IV controlled substances to Patient C, by instructing Patient C to take these controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2), and by treating Patient C without the direct supervision of a licensed physician.

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106. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

Respondent's Treatment of Patient D Without a License D.

- 107. Patient D was a twenty-two (22) year-old female at the time of the events at issue.
- 108. At all times relevant to Respondent's treatment of Patient D, the so-called "medical director" of Vida Spa was Sherman Washington, Jr., M.D.
- On October 12, 2019, Respondent, who did not have her own DEA registration and 109. controlled substance license issued by the NSBOP, utilized the prescribing credentials of Sherman Washington, Jr., M.D., to issue fraudulent prescriptions to Patient D for Tramadol (a Schedule IV Controlled Substance) 50 mg tablets, 24 ct. for 3 days and Diazepam (a Schedule IV Controlled Substance) 10 mg tablets, 8 ct. for 3 days; on information and belief, these prescriptions were called-in to the pharmacy by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and the prescriptions were filled the same day.
- 110. On information and belief, Respondent instructed Patient D to take the Schedule IV controlled substances in a manner that materially deviated from the issued prescriptions; Respondent instructed Patient D to take Tramadol 50mg, 2 tablets, and Diazepam 10 mg, 1 tablet, one hour in advance an invasive, surgical liposuction procedure Respondent planned to perform on Patient D at Vida Spa on October 13, 2019, for the purpose of conscious sedation.
- 111. On information and belief, Respondent wrote the prescriptions for these controlled substances and instructed Patient D to deviate from the issued prescription in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2).
- Dr. Washington did not see or treat Patient D, did not direct or supervise Respondent in her treatment of Patient D, and did not specifically direct Respondent to issue prescriptions to Patient D.
- 113. On October 13, 2019, at Vida Spa, Respondent performed a liposuction procedure on the abdomen and medial inferior upper arms of Patient D. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient D, which Respondent obtained, without a

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patient-specific prescription or an order from a licensed practitioner for Patient D, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.

114. Respondent was not supervised by any licensed physician while performing this invasive surgical procedure on Patient D at Vida Spa.

COUNT XIII

NRS 630.400(1)(d) - Unlicensed Practice of Medicine

- All of the allegations contained in the above paragraphs are hereby incorporated by 115. reference as though fully set forth herein.
- 116. Respondent practiced medicine without a license when she treated Patient D on October 12 and 13, 2019.
- Respondent, having been previously disciplined by the Arizona Board and incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by her subsequent application to the Board for a license to practice medicine in the State of Nevada, among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XIV

NRS 630.301(4) - Malpractice

- 119. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient D, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient D without first obtaining a license to practice medicine in the State of Nevada, by performing an

invasive surgical procedure on Patient D, by administering tumescent anesthesia to Patient D utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, by issuing fraudulent and illegal prescriptions for controlled substances to Patient D, by instructing Patient D to take controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2), and by treating Patient D without the direct supervision of a licensed physician.

121. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XV

NRS 630.3062(1)(h) – Fraudulent, Illegal, Unauthorized and Otherwise Inappropriate Prescribing of Schedule IV Controlled Substance

- 122. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- fraudulent, illegal, unauthorized and otherwise inappropriate prescriptions for Schedule IV controlled substances, Tramadol and Diazepam, to Patient D by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient D without first obtaining a license to practice medicine in the State of Nevada, a DEA registration, and a controlled substance license issued by the NSBOP, by issuing fraudulent and illegal prescriptions for these controlled substances to Patient D, by instructing Patient D to take these controlled substances in a manner that materially deviated from the issued prescriptions in order to conceal the purpose of the medications, which was conscious sedation, and thereby to conceal an apparent violation by Vida Spa of NRS 449.442(1)-(2).
- 124. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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

COUNT XVI

NRS 630.301(9) – Disreputable Conduct

- 125. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 126. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, knowingly, willfully and feloniously practicing medicine without first obtaining a license to practice medicine in the State of Nevada, and by performing an invasive surgical procedure on Patient D, administering tumescent anesthesia to Patient D utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients, issuing fraudulent prescriptions for controlled substances to Patient D, violating and attempting to conceal violations of NRS 449.442(1)-(2), and 21 CFR §1306.04(a)-(b) and NRS 453.381, and treating Patient D without the direct supervision of a licensed physician.

E. Respondent's Treatment of Patient E Without a License

- 127. Patient E was a thirty-three (33) year-old female at the time of the events at issue
- 128. At all times relevant to Respondent's treatment of Patient E, the so-called "medical director" of Vida Spa was Sherman Washington, Jr., M.D.
- 129. On October 8, 2019, Respondent, who did not have her own DEA registration and controlled substance license issued by the NSBOP, utilized the prescribing credentials of Sherman Washington, Jr., M.D., to issue a fraudulent prescription to Patient E for Tramadol (a Schedule IV Controlled Substance) 50 mg tablets, 20 ct. for 4 days, which prescription was filled the same day.
- 130. Dr. Washington did not see or treat Patient E, did not direct or supervise Respondent in her treatment of Patient E, and did not specifically direct Respondent to issue a prescription to Patient E.
- 131. On October 8, 2019, at Vida Spa, Respondent performed a liposuction procedure on the arms of Patient E. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient E, which Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner for Patient E, from a general store of controlled substances and

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dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.

132. Respondent was not supervised by any licensed physician while performing this invasive surgical procedure on Patient E at Vida Spa.

COUNT XVII

NRS 630.400(1)(d) - Unlicensed Practice of Medicine

- 133. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- Respondent practiced medicine without a license when she treated Patient E on 134. October 7 and 8, 2019.
- 135. Respondent, having been previously disciplined by the Arizona Board and incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by her subsequent application to the Board for a license to practice medicine in the State of Nevada, among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.
- By reason of the foregoing, Respondent is subject to discipline by the Board as 136. provided in NRS 630.352.

COUNT XVIII

NRS 630.301(4) - Malpractice

- 137. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient E, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient E without first obtaining a license to practice medicine in the State of Nevada, by performing an invasive surgical procedure on Patient E, by administering tumescent anesthesia to Patient E utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous

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drugs used for general administration and dispensing to patients, by issuing a fraudulent and illegal prescription for a controlled substances to Patient E, and by treating Patient E without the direct supervision of a licensed physician.

By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XIX

NRS 630.3062(1)(h) - Fraudulent, Illegal, Unauthorized and Otherwise Inappropriate **Prescribing of Schedule IV Controlled Substance**

- All of the allegations contained in the above paragraphs are hereby incorporated by 140. reference as though fully set forth herein.
- 141. As demonstrated by, but not limited to, the above-outlined facts, Respondent issued a fraudulent, illegal, unauthorized and otherwise inappropriate prescription for a Schedule IV controlled substances, Tramadol, to Patient E by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient E without first obtaining a license to practice medicine in the State of Nevada, a DEA registration, and a controlled substance license issued by the NSBOP, and by issuing a fraudulent and illegal prescription for a Schedule IV controlled substances to Patient E.
- 142. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XX

NRS 630.301(9) – Disreputable Conduct

- 143. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 144. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, knowingly, willfully and feloniously practicing medicine without first obtaining a license to practice medicine in the State of Nevada, and by performing an invasive surgical procedure on Patient E, by administering tumescent anesthesia to Patient E utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous

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drugs used for general administration and dispensing to patients, by issuing a fraudulent and illegal prescription for a Schedule IV controlled substances to Patient E, and by treating Patient E without the direct supervision of a licensed physician.

145. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

F. Respondent's Treatment of Patient F Without a License

- 146. Patient F was a male of unknown age at the time of the events at issue.
- At all times relevant to Respondent's treatment of Patient F, the so-called "medical 147. director" of Vida Spa was Sherman Washington, Jr., M.D.
- 148. On October 24, 2019, Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner for Patient F, "Botox," a neuromodulator that is derived from Clostridium botulinum or is biosimilar to or the bioequivalent of such a neuromodulator, and "Versa," a hyaluronic acid dermal filler, both of which are dangerous drugs as defined by NRS 454.201, from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients.
- Dr. Washington did not see or treat Patient F, and did not direct or supervise 149. Respondent in her treatment of Patient F.
- 150. On October 24, 2019, at Vida Spa, Respondent injected, and thereby administered pursuant to NRS 454.191, the aforementioned Botox and Versa into various locations on the face of Patient F.
- 151. Respondent was not supervised by any licensed physician while performing this injection procedure on Patient F at Vida Spa.

COUNT XXI

NRS 630.306(1)(u) - Illegal Injection of Botox

All of the allegations contained in the above paragraphs are hereby incorporated by 152. reference as though fully set forth herein.

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153. As demonstrated by, but not limited to, the above-outlined facts, Respondent injected Botox into the face of Patient F in violation of NRS 629.086 when she did so without a license to practice any form of medicine pursuant to NRS Chapter 630, NRS 631.391, NRS Chapter 633, or NRS 635.086, and at a location that is neither a medical facility, as defined in NRS 449.0151, nor at the office of a physician or physician assistant, licensed pursuant to NRS Chapters 630 or 633, dentist, advanced practice registered nurse or podiatric physician.

By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXII

NRS 630.306(1)(u) – Illegal Injection of Versa

- 155. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- As demonstrated by, but not limited to, the above-outlined facts, Respondent injected Versa into the face of Patient F in violation of NRS 454.217 when she did so without a license to practice any form of medicine pursuant to NRS Chapter 630, NRS 631.391, NRS Chapter 633, or NRS 635.086, and at a location that is neither a medical facility, as defined in NRS 449.0151, nor at the office of a physician or physician assistant, licensed pursuant to NRS Chapters 630 or 633, dentist, advanced practice registered nurse or podiatric physician.
- 157. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXIII

NRS 630.400(1)(d) – Unlicensed Practice of Medicine

- 158. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 159. Respondent practiced medicine without a license when she treated Patient F on October 24, 2019.
- Respondent, having been previously disciplined by the Arizona Board and incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her

license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by her subsequent application to the Board for a license to practice medicine in the State of Nevada, among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.

161. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXIV

NRS 630.301(4) - Malpractice

- 162. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 163. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient F, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient F without first obtaining a license to practice medicine in the State of Nevada, and by obtaining, without a patient-specific prescription or an order from a licensed practitioner for Patient F, dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs, and by injecting Botox and Versa into the face of Patient F in violation of NRS 629.086 and NRS 454.217, respectively, and by treating Patient F without the direct supervision of a licensed physician.
- 164. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXV

NRS 630.301(9) – Disreputable Conduct

- 165. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 166. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, knowingly, willfully and feloniously practicing medicine with

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respect to Patient F without first obtaining a license to practice medicine in the State of Nevada, and by obtaining, without a patient-specific prescription or an order from a licensed practitioner for Patient F, dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs, and by injecting Botox and Versa into the face of Patient F in violation of NRS 629.086 and NRS 454.217, respectively, and by treating Patient F without the direct supervision of a licensed physician.

167. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

G. Respondent's Treatment of Patient G Without a License

- 168. Patient G was a sixty-six (66) year-old female at the time of the events at issue.
- 169. At all times relevant to Respondent's treatment of Patient G, the so-called "medical director" of Vida Spa was Sherman Washington, Jr., M.D.
- 170. On October 29, 2019, Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner for Patient G, "Xeomin," a neuromodulator that is derived from Clostridium botulinum or is biosimilar to or the bioequivalent of such a neuromodulator, and "Versa," a hyaluronic acid dermal filler, both of which are dangerous drugs as defined by NRS 454.201, from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients.
- 171. Dr. Washington did not see or treat Patient G, did not direct or supervise Respondent in her treatment of Patient G.
- 172. On October 24, 2019, at Vida Spa, Respondent injected, and thereby administered pursuant to NRS 454.191, the aforementioned Xeomin and Versa into various locations on the face of Patient G.
- Respondent was not supervised by any licensed physician while performing this 173. injection procedure on Patient G at Vida Spa.

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COUNT XXVI

NRS 630.306(1)(u) – Illegal Injection of Xeomin

- 174. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- As demonstrated by, but not limited to, the above-outlined facts, Respondent injected Xeomin into the face of Patient G in violation of NRS 629.086 when she did so without a license to practice any form of medicine pursuant to NRS Chapter 630, NRS 631.391, NRS Chapter 633, or NRS 635.086, and at a location that is neither a medical facility, as defined in NRS 449.0151, nor at the office of a physician or physician assistant, licensed pursuant to NRS Chapters 630 or 633, dentist, advanced practice registered nurse or podiatric physician.
- 176. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXVII

NRS 630.306(1)(u) – Illegal Injection of Versa

- All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 178. As demonstrated by, but not limited to, the above-outlined facts, Respondent injected Versa into the face of Patient G in violation of NRS 454.217 when she did so without a license to practice any form of medicine pursuant to NRS Chapter 630, NRS 631.391, NRS Chapter 633, or NRS 635.086, and at a location that is neither a medical facility, as defined in NRS 449.0151, nor at the office of a physician or physician assistant, licensed pursuant to NRS Chapters 630 or 633, dentist, advanced practice registered nurse or podiatric physician.
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXVIII

NRS 630.400(1)(d) – Unlicensed Practice of Medicine

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

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181. Respondent practiced medicine without a license when she treated Patient G on October 29, 2019.

Respondent, having been previously disciplined by the Arizona Board and incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by her subsequent application to the Board for a license to practice medicine in the State of Nevada, among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.

By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXIX

NRS 630.301(4) - Malpractice

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

185. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient G, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient G without first obtaining a license to practice medicine in the State of Nevada, and by obtaining, without a patient-specific prescription or an order from a licensed practitioner for Patient G, dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs, and by injecting Xeomin and Versa into the face of Patient G in violation of NRS 629.086 and NRS 454.217, respectively, and by treating Patient G without the direct supervision of a licensed physician.

By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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COUNT XXX

NRS 630.301(9) – Disreputable Conduct

- 187. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient G without first obtaining a license to practice medicine in the State of Nevada, and by obtaining, without a patient-specific prescription or an order from a licensed practitioner for Patient G, dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs, and by injecting Xeomin and Versa into the face of Patient G in violation of NRS 629.086 and NRS 454.217, respectively, and by treating Patient G without the direct supervision of a licensed physician.
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

H. Respondent's Treatment of Patient H Without a License

- 190. Patient H was a forty-two (42) year-old person of unknown gender at the time of the events at issue.
- 191. At all times relevant to Respondent's treatment of Patient H, Vida Spa had no socalled "medical director," the directorship of Dr. Sherman Washington having terminated on November 1, 2019.
- At all times relevant to Respondent's treatment of Patient H, the only parties 192. responsible for Vida Spa's activities with respect to Patient H were Respondent and, on information and belief, the parties listed on Clark County Business License No. 2003447.081-172. under the business category of "Cosmetology Establishment - Other Services," the owners of Vida Spa: Art Matrix, Inc. and Gisselle Platfoot.
- 193. On November 5, 2019 obtained, without a patient-specific prescription or an order from a licensed practitioner for Patient H, "Versa," a hyaluronic acid dermal filler, a dangerous ///

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drug as defined by NRS 454.201, from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients.

- 194. On November 5, 2019, at Vida Spa, Respondent injected, and thereby administered pursuant to NRS 454.191, the aforementioned Versa into various locations on the face of Patient H.
- 195. Respondent was not supervised by any licensed physician while performing this injection procedure on Patient H at Vida Spa.

COUNT XXXI

NRS 630.306(1)(u) – Illegal Injection of Versa

- 196. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 197. As demonstrated by, but not limited to, the above-outlined facts, Respondent injected Versa into the face of Patient H in violation of NRS 454.217 when she did so without a license to practice any form of medicine pursuant to NRS Chapter 630, NRS 631.391, NRS Chapter 633, or NRS 635.086, and at a location that is neither a medical facility, as defined in NRS 449.0151, nor at the office of a physician or physician assistant, licensed pursuant to NRS Chapters 630 or 633, dentist, advanced practice registered nurse or podiatric physician.
- 198. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXXII

NRS 630.400(1)(d) – Unlicensed Practice of Medicine

- 199. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 200. Respondent practiced medicine without a license when she treated Patient H on November 5, 2019.
- Respondent, having been previously disciplined by the Arizona Board and incarcerated in the State of Arizona for conduct related to her practice of medicine, having let her license to practice medicine in the State of Arizona expire while incarcerated, and as evidenced by

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her subsequent application to the Board for a license to practice medicine in the State of Nevada, among other evidence of scienter, Respondent's unlicensed practice of medicine in violation of NRS 630.400(1)(d) was knowing and willful.

202. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXXIII

NRS 630.301(4) - Malpractice

- 203. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 204. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient H, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient H without first obtaining a license to practice medicine in the State of Nevada, and by obtaining, without a patient-specific prescription or an order from a licensed practitioner for Patient H. dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs, and by injecting Versa into the face of Patient H in violation of NRS 454.217, and by treating Patient H without the direct supervision of a licensed physician.
- 205. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXXIV

NRS 630.301(9) - Disreputable Conduct

- 206. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 207. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient H, by, among other misconduct, knowingly, willfully and feloniously practicing medicine with respect to Patient H without first obtaining a license to practice medicine in the

State of Nevada, and by obtaining, without a patient-specific prescription or an order from a licensed practitioner for Patient H, dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs, and by injecting Versa into the face of Patient H in violation of NRS 454.217, and by treating Patient H without the direct supervision of a licensed physician.

208. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

IV. RESPONDENT'S FRAUD IN OBTAINING LICENSURE

COUNT XXXV

NRS 630.304(1) - Fraud and Misrepresentation in Obtaining a License

- 209. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 210. As demonstrated by, but not limited to, the above-outlined facts, Respondent obtained a license to practice medicine by fraud, misrepresentation and false, misleading, inaccurate and incomplete statements when, on March 6, 2020, in a public meeting of the Board, when the Board was considering her application for licensure as a physician assistant in the State of Nevada, in open session, Respondent informed the Board that she had not practiced clinical medicine since she had been incarcerated, and stated that, though she had secured a job at a medical spa, and planned in the future to perform plastic surgery injections, in-office procedures, excisions, and assisting with different procedures, nevertheless, she had not done so yet and the aforementioned job offer was contingent upon her obtaining a license in Nevada.
- 211. As demonstrated by, but not limited to, the above-outlined facts, Respondent's statements to the Board on March 6, 2020, were materially false and Respondent knew they were materially false when she made the statements.
- 212. As demonstrated by, but not limited to, the above-outlined facts, Respondent's statements to the Board on March 6, 2020, were knowing misrepresentations of the truth and made to conceal material facts that would have prevented her from obtaining licensure.
- 213. As demonstrated by, but not limited to, the above-outlined facts, Respondent's statements to the Board on March 6, 2020, were intentionally misleading, and made to induce the

Board to act to the detriment of the public safety by issuing her a license to practice medicine, despite the fact that she had already been knowingly, willingly, feloniously practicing medicine without a license.

- 214. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.
- V. RESPONDENT'S PERFORMANCE OF MEDICAL SERVICES WITHOUT A SUPERVISING PHYSICIAN, ADMINISTRATION OF CONSCIOUS SEDATION AT VIDA SPA, AN UNPERMITTED AND UNACCREDITED FACILITY PURSUANT TO NRS 449.442, AND RELATED VIOLATIONS OF THE NEVADA MEDICAL PRACTICE ACT
 - I. Respondent's Treatment of Patient I
 - 215. Patient I was a twenty-nine (29) year-old female at the time of the events at issue.
- 216. At all times relevant to Respondent's treatment of Patient I, the so-called "medical director" of Vida Spa was Salvador Borromeo, III, M.D.
- 217. At all times relevant to Respondent's treatment of Patient I, Respondent did not have a supervising physician, and did not have a supervising physician agreement on file with and accepted by the Board, and was therefore expressly prohibited from performing medical services pursuant to NAC 630.375(2).
- 218. The medical services rendered to Patient I by Respondent did not occur in a life-threatening or emergency situation.
- 219. On June 1, 2020, Respondent, who did not have her own DEA registration and controlled substance license issued by the NSBOP, utilized the prescribing credentials of Salvador Borromeo, III, M.D., to issue prescriptions to Patient I for Oxycodone-acetaminophen (a Schedule II Controlled Substance) 5-325 mg tablets, 12 ct. for 3 days; Alprazolam (a Schedule IV Controlled Substance) 1 mg tablets, 4 ct. for 2 days; Promethazine 25 mg tablets, 10 ct. for 2 days, Sulfameth/Trimethprim 800/160 mg tablets, 20 ct. for 10 days.
- 220. Respondent issued prescriptions for these controlled substances and dangerous drugs by using the pre-printed prescription pad of Salvador Borromeo, III, M.D., which contained his pre-printed DEA number; the prescription was completed by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, with Patient I's name and with the

corresponding medications, quantities and doses. Respondent, or a Vida Spa employee or agent acting at Respondent's direction, presented the prescription to Dr. Borromeo, who then signed the prescription with the understanding that the controlled substances and dangerous drugs would then be used by Respondent on Patient I for the purpose of performing an invasive surgical procedure on Patient I.

- 221. The material purpose for prescribing the controlled substances to Patient I was conscious sedation and pain control for an invasive surgical procedure to be performed on Patient I.
- 222. Dr. Borromeo's express purpose in signing the already completed written prescriptions for controlled substances for Patient I was for conscious sedation and pain control for invasive surgical procedure to be performed on Patient I.
- Pharmacy Santa Maria, at 3827 E. Sunset Rd, Ste L, Las Vegas, Nevada 89120, which filled the prescription, and the controlled substances and dangerous drugs were then delivered directly to Vida Spa. The controlled substances and dangerous drugs were accepted at Vida Spa by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and then administered to Patient I by Respondent, or by a Vida Spa employee or agent supervised directly by Respondent.
- 224. Respondent, a Vida Spa employee or agent acting at Respondent's direction in the Respondent's presence, or Patient I at the direction and in the presence of Respondent, directly administered to Patient I the controlled substances, Alprazolam and Oxycodone-acetominophen, by ingestion.
- 225. Dr. Borromeo did not see or treat Patient I, and did not direct or supervise Respondent in her treatment of Patient I.
- 226. On June 2, 2020, at Vida Spa, Respondent performed a liposuction procedure on the upper and lower abdomen and arms of Patient I, and a fat grafting procedure to Patient I's breasts. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient I, which Respondent obtained, without a patient-specific prescription or an order from a

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licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient I, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.

227. Respondent was not supervised by any licensed physician while performing this invasive surgical procedure on Patient I at Vida Spa.

COUNT XXXVI

NAC 630.380(1)(c) - Performing Medical Services Without A Supervising Physician

- 228. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 229. Respondent performed medical services without the direction and supervision of a supervising physician, and in a non-emergency and non-life-threatening situation, when she treated Patient I on June 1 and 2, 2020.
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXXVII

NRS 630.301(4) - Malpractice

- 231. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 232. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient I by performing an invasive surgical procedure on Patient I without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient I utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient I, by administering or directly supervising the administration of conscious sedation to Patient I, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).

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By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXXVIII

NRS 630.306(1)(0) – Administration of Conscious Sedation at an Unaccredited and **Unpermitted Facility**

- 234. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 235. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed to comply with NRS 630.373 when rendering medical services to Patient I, by, among other misconduct, administering and/or supervising directly the administration of conscious sedation to Patient I for an invasive surgical procedure that Respondent performed on Patient I at Vida Spa, which is not the office of a physician or osteopathic physician which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, not a facility which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, and not a medical facility as that term is defined in NRS 449.0151, and which is located inside the State of Nevada.
- 236. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XXXIX

NRS 630.301(9) – Disreputable Conduct

- 237. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, by performing an invasive surgical procedure on Patient I without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient I utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patientspecific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient I, by administering or directly supervising the

administration of conscious sedation to Patient I, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).

239. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

J. Respondent's Treatment of Patient J

- 240. Patient J was a forty (40) year-old female at the time of the events at issue.
- 241. At all times relevant to Respondent's treatment of Patient J, the so-called "medical director" of Vida Spa was Salvador Borromeo, III, M.D.
- 242. At all times relevant to Respondent's treatment of Patient J, Respondent did not have a supervising physician, and did not have a supervising physician agreement on file with and accepted by the Board, and was therefore expressly prohibited from performing medical services pursuant to NAC 630.375(2).
- 243. The medical services rendered to Patient J by Respondent did not occur in a life-threatening or emergency situation.
- 244. On June 2, 2020, Respondent, who did not have her own DEA registration and controlled substance license issued by the NSBOP, utilized the prescribing credentials of Salvador Borromeo, III, M.D., to issue prescriptions to Patient J for Oxycodone-acetaminophen (a Schedule II Controlled Substance) 5-325 mg tablets, 12 ct. for 3 days; Alprazolam (a Schedule IV Controlled Substance) 1 mg tablets, 4 ct. for 2 days; Promethazine 25 mg tablets, 10 ct. for 2 days, Sulfameth/Trimethprim 800/160 mg tablets, 20 ct. for 10 days.
- 245. Respondent issued prescriptions for these controlled substances and dangerous drugs by using the pre-printed prescription pad of Salvador Borromeo, III, M.D., which contained his pre-printed DEA number; the prescription was completed by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, with Patient J's name and with the corresponding medications, quantities and doses. Respondent, or a Vida Spa employee or agent acting at Respondent's direction, presented the prescription to Dr. Borromeo, who then signed the prescription with the understanding that the controlled substances and dangerous drugs

would then be used by Respondent on Patient J for the purpose of performing an invasive surgical procedure on Patient J.

- 246. The material purpose for prescribing the controlled substances to Patient J was conscious sedation and pain control for an invasive surgical procedure to be performed on Patient J.
- 247. Dr. Borromeo's express purpose in signing the already completed written prescriptions for controlled substances for Patient J was for conscious sedation and pain control for invasive surgical procedure to be performed on Patient J.
- 248. The written prescription issued for Patient J in this manner was then presented to Pharmacy Santa Maria, at 3827 E. Sunset Rd, Ste L, Las Vegas, Nevada 89120, which filled the prescription, and the controlled substances and dangerous drugs were then delivered directly to Vida Spa. The controlled substances and dangerous drugs were accepted at Vida Spa by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and then administered to Patient J by Respondent, or by a Vida Spa employee or agent supervised directly by Respondent.
- 249. Respondent, a Vida Spa employee or agent acting at Respondent's direction in the Respondent's presence, or Patient J at the direction and in the presence of Respondent, directly administered to Patient J the controlled substances, Alprazolam and Oxycodone-acetominophen, by ingestion.
- 250. Dr. Borromeo did not see or treat Patient J, and did not direct or supervise Respondent in her treatment of Patient J.
- 251. On June 3, 2020, at Vida Spa, Respondent performed a liposuction procedure on Patient J. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient J, which Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient J, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.

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252. Respondent was not supervised by any licensed physician while performing this invasive surgical procedure on Patient J at Vida Spa.

COUNT XL

NAC 630.380(1)(c) - Performing Medical Services Without A Supervising Physician

- 253. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- Respondent performed medical services without the direction and supervision of a 254. supervising physician, and in a non-emergency and non-life-threatening situation, when she treated Patient J on June 2 and 3, 2020.
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XLI

NRS 630.301(4) - Malpractice

- 256. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 257. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient J by performing an invasive surgical procedure on Patient J without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient J utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient J, by administering or directly supervising the administration of conscious sedation to Patient J, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).
- 258. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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COUNT XLII

NRS 630.306(1)(0) – Administration of Conscious Sedation at an Unaccredited and Unpermitted Facility

- 259. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 260. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed to comply with NRS 630.373 when rendering medical services to Patient J, by, among other misconduct, administering and/or supervising directly the administration of conscious sedation to Patient J for an invasive surgical procedure that Respondent performed on Patient J at Vida Spa, which is not the office of a physician or osteopathic physician which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, not a facility which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, and not a medical facility as that term is defined in NRS 449.0151, and which is located inside the State of Nevada.
- 261. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XLIII

NRS 630.301(9) - Disreputable Conduct

- 262. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 263. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, by performing an invasive surgical procedure on Patient J without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient J utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient J, by administering or directly supervising the administration of conscious sedation to Patient J, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).

264. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

K. Respondent's Treatment of Patient K

- 265. Patient K was a thirty-five (35) year-old female at the time of the events at issue.
- 266. At all times relevant to Respondent's treatment of Patient K, the so-called "medical director" of Vida Spa was Salvador Borromeo, III, M.D.
- 267. At all times relevant to Respondent's treatment of Patient K, Respondent did not have a supervising physician, and did not have a supervising physician agreement on file with and accepted by the Board, and was therefore expressly prohibited from performing medical services pursuant to NAC 630.375(2).
- 268. The medical services rendered to Patient K by Respondent did not occur in a life-threatening or emergency situation.
- 269. On June 3, 2020, Respondent, who did not have her own DEA registration and controlled substance license issued by the NSBOP, utilized the prescribing credentials of Salvador Borromeo, III, M.D., to issue prescriptions to Patient K for Oxycodone-acetaminophen (a Schedule II Controlled Substance) 5-325 mg tablets, 12 ct. for 3 days; Alprazolam (a Schedule IV Controlled Substance) 1 mg tablets, 4 ct. for 2 days; Promethazine 25 mg tablets, 10 ct. for 2 days, Sulfameth/Trimethprim 800/160 mg tablets, 20 ct. for 10 days.
- 270. Respondent issued prescriptions for these controlled substances and dangerous drugs by using the pre-printed prescription pad of Salvador Borromeo, III, M.D., which contained his pre-printed DEA number; the prescription was completed by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, with Patient K's name and with the corresponding medications, quantities and doses. Respondent, or a Vida Spa employee or agent acting at Respondent's direction, presented the prescription to Dr. Borromeo, who then signed the prescription with the understanding that the controlled substances and dangerous drugs would then be used by Respondent on Patient K for the purpose of performing an invasive surgical procedure on Patient K.

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271. The material purpose for prescribing the controlled substances to Patient K was conscious sedation and pain control for an invasive surgical procedure to be performed on Patient K.

- 272. Dr. Borromeo's express purpose in signing the already completed written prescriptions for controlled substances for Patient K was for conscious sedation and pain control for invasive surgical procedure to be performed on Patient K.
- The written prescription issued for Patient K in this manner was then presented to Pharmacy Santa Maria, at 3827 E. Sunset Rd, Ste L, Las Vegas, Nevada 89120, which filled the prescription, and the controlled substances and dangerous drugs were then delivered directly to Vida Spa. The controlled substances and dangerous drugs were accepted at Vida Spa by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and then administered to Patient K by Respondent, or by a Vida Spa employee or agent supervised directly by Respondent.
- 274. Respondent, a Vida Spa employee or agent acting at Respondent's direction in the Respondent's presence, or Patient K at the direction and in the presence of Respondent, directly administered to Patient K the controlled substances, Alprazolam and Oxycodone-acetominophen, by ingestion.
- Dr. Borromeo did not see or treat Patient K, and did not direct or supervise Respondent in her treatment of Patient K.
- 276. On June 4, 2020, at Vida Spa, Respondent performed a liposuction procedure on the upper back and flanks of Patient K. On information and belief, Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient K, which Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient K, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.
- 277. Respondent was not supervised by any licensed physician while performing this invasive surgical procedure on Patient K at Vida Spa.

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COUNT XLIV

NAC 630.380(1)(c) – Performing Medical Services Without A Supervising Physician

- 278. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 279. Respondent performed medical services without the direction and supervision of a supervising physician, and in a non-emergency and non-life-threatening situation, when she treated Patient K on June 3 and 4, 2020.
- 280. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XLV

NRS 630.301(4) - Malpractice

- 281. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 282. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient K by performing an invasive surgical procedure on Patient K without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient K utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient K, by administering or directly supervising the administration of conscious sedation to Patient K, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).
- 283. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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COUNT XLVI

NRS 630.306(1)(0) – Administration of Conscious Sedation at an Unaccredited and Unpermitted Facility

- 284. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 285. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed to comply with NRS 630.373 when rendering medical services to Patient K, by, among other misconduct, administering and/or supervising directly the administration of conscious sedation to Patient K for an invasive surgical procedure that Respondent performed on Patient K at Vida Spa, which is not the office of a physician or osteopathic physician which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, not a facility which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, and not a medical facility as that term is defined in NRS 449.0151, and which is located inside the State of Nevada.
- 286. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT XLVII

NRS 630.301(9) – Disreputable Conduct

- 287. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 288. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, by performing an invasive surgical procedure on Patient K without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient K utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient K, by administering or directly supervising the administration of conscious sedation to Patient K, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).

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By reason of the foregoing, Respondent is subject to discipline by the Board as 289. provided in NRS 630.352.

L. Respondent's Treatment of Patient L

- 290. Patient L was a forty (40) year-old female at the time of the events at issue.
- 291. At all times relevant to Respondent's treatment of Patient L, the so-called "medical director" of Vida Spa was Salvador Borromeo, III, M.D.
- At all times relevant to Respondent's treatment of Patient L, Respondent did not 292. have a supervising physician, and did not have a supervising physician agreement on file with and accepted by the Board, and was therefore expressly prohibited from performing medical services pursuant to NAC 630.375(2).
- 293. The medical services rendered to Patient L by Respondent did not occur in a lifethreatening or emergency situation.
- On June 4, 2020, Respondent, who did not have her own DEA registration and controlled substance license issued by the NSBOP, utilized the prescribing credentials of Salvador Borromeo, III, M.D., to issue prescriptions to Patient L for Oxycodone-acetaminophen (a Schedule II Controlled Substance) 5-325 mg tablets, 12 ct. for 3 days; Alprazolam (a Schedule IV Controlled Substance) 1 mg tablets, 4 ct. for 2 days; Promethazine 25 mg tablets, 10 ct. for 2 days, Sulfameth/Trimethprim 800/160 mg tablets, 20 ct. for 10 days.
- 295. Respondent issued prescriptions for these controlled substances and dangerous drugs by using the pre-printed prescription pad of Salvador Borromeo, III, M.D., which contained his pre-printed DEA number; the prescription was completed by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, with Patient L's name and with the corresponding medications, quantities and doses. Respondent, or a Vida Spa employee or agent acting at Respondent's direction, presented the prescription to Dr. Borromeo, who then signed the prescription with the understanding that the controlled substances and dangerous drugs would then be used by Respondent on Patient L for the purpose of performing an invasive surgical procedure on Patient L.

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296. The material purpose for prescribing the controlled substances to Patient L was conscious sedation and pain control for an invasive surgical procedure to be performed on Patient L.

- 297. Dr. Borromeo's express purpose in signing the already completed written prescriptions for controlled substances for Patient L was for conscious sedation and pain control for invasive surgical procedure to be performed on Patient L.
- The written prescription issued for Patient L in this manner was then presented to Pharmacy Santa Maria, at 3827 E. Sunset Rd, Ste L, Las Vegas, Nevada 89120, which filled the prescription, and the controlled substances and dangerous drugs were then delivered directly to Vida Spa. The controlled substances and dangerous drugs were accepted at Vida Spa by Respondent, or by a Vida Spa employee or agent acting at Respondent's direction, and then administered to Patient L by Respondent, or by a Vida Spa employee or agent supervised directly by Respondent.
- Respondent, a Vida Spa employee or agent acting at Respondent's direction in the Respondent's presence, or Patient L at the direction and in the presence of Respondent, directly administered to Patient L the controlled substances, Alprazolam and Oxycodone-acetominophen, by ingestion.
- 300. Dr. Borromeo did not see or treat Patient L, and did not direct or supervise Respondent in her treatment of Patient L.
- 301. On June 5, 2020, at Vida Spa, Respondent performed a liposuction procedure on the abdomen, flanks back and "bra straps" of Patient L, and a fat transfer to the buttocks of Patient L. Respondent administered tumescent anesthesia with Lidocaine and Epinephrine to Patient L, which Respondent obtained, without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwised authorized to perform medical services for Patient L, from a general store of controlled substances and dangerous drugs obtained and maintained by Vida Spa in violation of federal and state law.
- 302. Respondent was not supervised by any licensed physician while performing this invasive surgical procedure on Patient L at Vida Spa.

(775) 688-2559

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COUNT XLVIII

NAC 630.380(1)(a) - Performing Medical Services Without A Supervising Physician

- 303. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 304. Respondent performed medical services without the direction and supervision of a supervising physician, and in a non-emergency and non-life-threatening situation, when she treated Patient L on June 4 and 5, 2020.
- By reason of the foregoing, Respondent is subject to discipline by the Board as 305. provided in NRS 630.352.

COUNT XLIX

NRS 630.301(4) - Malpractice

- All of the allegations contained in the above paragraphs are hereby incorporated by 306. reference as though fully set forth herein.
- 307. As demonstrated by, but not limited to, the above-outlined facts, Respondent committed malpractice when she failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient L by performing an invasive surgical procedure on Patient L without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient L utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patient-specific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient L, by administering or directly supervising the administration of conscious sedation to Patient L, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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COUNT L

NRS 630.306(1)(o) - Administration of Conscious Sedation at an Unaccredited and **Unpermitted Facility**

- 309. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 310. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed to comply with NRS 630.373 when rendering medical services to Patient L, by, among other misconduct, administering and/or supervising directly the administration of conscious sedation to Patient L for an invasive surgical procedure that Respondent performed on Patient L at Vida Spa, which is not the office of a physician or osteopathic physician which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, not a facility which holds a permit pursuant to NRS 449.435 to 449.448, inclusive, and not a medical facility as that term is defined in NRS 449.0151, and which is located inside the State of Nevada.
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT LI

NRS 630.301(9) – Disreputable Conduct

- 312. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 313. Respondent engaged in conduct that brings the medical profession into disrepute by, among other misconduct, by performing an invasive surgical procedure on Patient L without the direction and supervision of a supervising physician, by administering tumescent anesthesia to Patient L utilizing dangerous drugs from Vida Spa's general store of controlled substances and dangerous drugs used for general administration and dispensing to patients without a patientspecific prescription or an order from a licensed practitioner or a practitioner otherwise authorized to perform medical services for Patient L, by administering or directly supervising the administration of conscious sedation to Patient L, which is a violation of NRS 630.373 and an apparent violation by Vida Spa of NRS 449.442(1)-(2).

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314. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

V. RESPONDENT'S CONTINUAL FAILURE TO ENGAGE IN THE PRACTICE OF MEDICINE IN A PROFESSIONAL MANNER

COUNT LII

NRS 630.306(1)(g) - Continual Failure to Practice Medicine Properly

- 315. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 316. As demonstrated by, but not limited to, the above-outlined facts, by abundantly and abidingly demonstrating through numerous, repeated, knowing, willful and criminal failures, both before and after her licensure in this state, by engaging in the unlicensed practice of medicine, committing malpractice, violating state and federal laws pertaining to the proper handling, prescription and administration of dangerous drugs and controlled substances, performing medical services without a supervising physician, and obtaining licensure in this state by fraud and misrepresentation, among other serious violations, Respondent has continually failed to exercise the skill and diligence and use the methods ordinarily exercised under the same circumstances by physicians in good standing practicing in the same specialty or field.
- 317. Respondent's conduct, considered in its entirety, is extraordinarily and persistently unprofessional in character.
- By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT LIII

NRS 630.3065(2)(a) - Knowing or Willful Failure to Comply with an Order of the **Investigative Committee**

All of the allegations contained in the above paragraphs are hereby incorporated by 319. reference as though fully set forth herein.

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	320.	Pursuant to	NRS 630.3065(2)(a), knowingly or willfully failing to comply with	ar
order	of the	Investigative	Committee of the Board is grounds for disciplinary action or deny	ing
licensu	ıre.			

- 321. The IC is investigating complaints related to instances of alleged malpractice and serious patient injury caused by Licensee, in furtherance of which the IC has issued an Order to Produce Healthcare Records ("Order for Records") pursuant to its authority pursuant to NRS 630.311(1), and issued an allegation letter, both of which lawfully command a response from Licensee.
- 322. Pursuant to NRS 630.254, Licensee is required to maintain a permanent mailing address with the Board to which all communications from the Board to the licensee must be sent.
- 323. The IC sent its allegation letter to Licensee by USPS Regular Mail addressed to Licensee's address of record on or about December 17, 2020.
- 324. The IC sent its allegation letter and Order for Records to Licensee by USPS Regular Mail addressed to Licensee's address of record on or about January 29, 2021.
- 325. The IC sent its allegation letter and Order for Records to Licensee by USPS. Certified Mail addressed to Licensee's address of record on or about February 26, 2021, which was certified delivered on March 1, 2021.
- 326. The IC sent its allegation letter and Order for Records to Licensee via email to the email address on file with the Board on or about March 19, 2021.
- 327. The IC sent its allegation letter and Order for Records to Licensee by FedEx Ground to Licensee's address of record on or about June 28, 2021, which was delivered on July 1, 2021.
- 328. As of the date of the filing of this First Amended Complaint, Licensee has failed to comply with the IC's allegation letter and lawful Order to Produce Healthcare Records, which failure is impeding the IC's investigation of this matters.
- 329. On information and belief, Licensee's failure to comply with the IC's Order is knowing and willful.

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provided in NRS 630.352.

WHEREFORE, the Investigative Committee prays: That the Board give Respondent notice of the charges herein against her and give 4 him notice that she may file an answer to the Complaint herein as set forth in 5 NRS 630.339(2) within twenty (20) days of service of the Complaint; 6 That the Board set a time and place for a formal hearing after holding an Early 7 2. 8 Case Conference pursuant to NRS 630.339(3); That the Board determine what sanctions to impose if it determines there has been 9 3. 10 a violation or violations of the Medical Practice Act committed by Respondent; 11 4. That the Board award fees and costs for the investigation and prosecution of this case as outlined in NRS 622.400; 12 That the Board make, issue and serve on Respondent its findings of fact, 13 5. conclusions of law and order, in writing, that includes the sanctions imposed; and 14 That the Board take such other and further action as may be just and proper in these 15 6. premises. 16 DATED this 19 day of July, 2021. 17 18 INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS 19 20 By: AARON B. FRICKE, J.D. 21 General Counsel 22 9600 Gateway Drive Reno, NV 89521 23 Tel: (775) 688-2559 Email: africke@medboard.nv.gov 24 Attorney for the Investigative Committee 25 26 27 28

By reason of the foregoing, Respondent is subject to discipline by the Board as

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners 9600 Gateway Drive Reno, Nevada 89521

VERIFICATION

STATE OF NEVADA)
	: SS
COUNTY OF CLARK)

(775) 688-2559

Victor M. Muro, 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 Hay of July, 2021.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

VICTOR M. MURO, M.D.

Chairman for the Investigative Committee

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

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In the Matter of Charges and Complaint Ca

Against:

TAMMY LYNN HANKINS, PA-C,

Respondent.

Case No. 21-51633-1

FILED

JUL 2 9 2021

NEVADA STATE BOARD OF MEDICAL EXAMINERS

PROOF OF SERVICE

I, Mercedes Fuentes, Legal Assistant for the Nevada State Board of Medical Examiners, hereby certify that on the 20th day of July, 2021, I sent a filed-stamped copy of the **ORDER OF SUMMARY SUSPENSION** and **FIRST AMENDED COMPLAINT** filed in this matter to Legal Process Service (LPS) for personal sevice upon Tammy Lynn Hankins, PA-C, at 3753 Cherry Tree Blvd., Lake Havasu City, Arizona 86406. On the 29th day of July, 2021, I received an Affidavit of Attempted Service from LPS indicating that attempts to serve Tammy Lynn Haninks, PA-C (Respondent), were to no avail and process server believed that subject was avoiding the attempts for service. *See* **Exhibit 1**.

Additionally, on the 22nd day of July, 2021, I mailed by USPS Certified Mail No. 9171969009350255617807, copies of the same to Respondent. This mailing was delivered and signed for on the 24th day of July, 2021. Proof of delivery is attached hereto as **Exhibit 2**.

Pursuant to NRS 630.344 "service of process under this chapter must be made on a licensee personally, or by registered or certified mail with return receipt requested addressed to the licensee at his or her last known address", and therefore formal service has been effectuated.

DATED this agm day of July, 2021.

MERCEDES FUENTES

Legal Assistant

Nevada State Board of Medical Examiners

OFFICE OF THE GENERAL COUNSEL

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

INDEX OF EXHIBITS

NO.	NAME	NO. OF PAGES
1.	Affidavit of Attempted Service by Patricia Gable	2
2.	USPS Proof of Delivery for 9171969009350255617807	3

EXHIBIT 1

EXHIBIT 1

Date

7/20/21

AFFT
Nevada State Board of Medical Examiners
Aaron B. Fricke, J.D.
9600 Gateway Drive
Reno , NV 89521
State Bar No.:
Attorney(s) for: Investigative Committee

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

Case No.: 21-51633-1

Dept. No.:

In the Matter of Charges and Complaint Against:

Address

2:00pm As Above

Outcome

Tammy Lynn Hankins, PA-C

Time

Respondent(s)

September 20, 2021

ndendəy

Address corresponds to a one story residence. There was no answer at the

Date: 9:00AM

Time:

AFFIDAVIT OF ATTEMPTED SERVICE

Patricia Gable, being duly swom deposes and says: That Affiant is and was on the day when she attempted to serve the within action, a citizen of the United States, over 18 years of age, and not a party to or interested in, the within action: That the affiant received the within First Amended Complaint: Order of Summary Suspension on the 20th day of July, 2021 and attempted to effect service on Tammy Lynn Hankins, PA-C at the following address(es): 3753 Cherry Tree Blvd., Lake Havasu City, AZ 86406. Below are listed that date(s) and time(s) of attempted service.

112012	2.509/1// 10 / 0/0/0	door and no visible activity or sounds. There were no vehicles present.
7/21/21	8:45am As Above	There were no changes from the previous attempt.
7/22/21	2:45pm As Albove	There was no answer at the door. Affiant could hear voices when first
		approaching the door and it was quiet after she knocked. A vehicle was seen present.
7/23/21	8:30am As Above	There was no answer at the door and no activity observed. The same vehicle was seen present from the previous attempt. Affiant believes subject is avoiding.
7/25/21	11:10am As Above	There was no answer at the door and no visible activity or sounds. There were no vehicles present.

7/27/21

6:20pm As Above There was no answer at the door and no activity observed. The same vehicle was seen present.

I declare under penalty of perjury under the law of the state of Nevada that the foregoing is true and correct. Executed this Aday of July 2021

Fatricia (table Process Server #MH-2021-00006

WorkOrderNo 2105227

EXHIBIT 2

EXHIBIT 2



July 26, 2021

Dear Mercedes Fuentes:

The following is in response to your request for proof of delivery on your item with the tracking number: 9171 9690 0935 0255 6178 07.

Item Details

Status:

Delivered, Left with Individual

Status Date / Time:

July 24, 2021, 11:44 am

Location:

LAKE HAVASU CITY, AZ 86406

Postal Product: Extra Services:

First-Class Mail®

Certified Mail™

Return Receipt Electronic

Recipient Signature

Signature of Recipient:

FULT. Hanking ST R32

Address of Recipient:

275 Jenne

Note: Scanned image may reflect a different destination address due to Intended Recipient's delivery instructions on file.

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely, United States Postal Service® 475 L'Enfant Plaza SW Washington, D.C. 20260-0004

USPS Tracking[®]

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Tracking Number: 9171969009350255617807

Remove X

Your item was delivered to an individual at the address at 11:44 am on July 24, 2021 in LAKE HAVASU CITY, AZ 86406.

⊘ Delivered, Left with Individual

July 24, 2021 at 11:44 am LAKE HAVASU CITY, AZ 86406 reedback

Get Updates ✓

Text & Email Updates	~
Return Receipt Electronic	~
	A

July 24, 2021, 11:44 am
Delivered, Left with Individual
LAKE HAVASU CITY, AZ 86406

Tracking History

Your item was delivered to an individual at the address at 11:44 am on July 24, 2021 in LAKE HAVASU CITY, AZ 86406.

July 23, 2021, 8:46 pm
Departed USPS Regional Facility
LAS VEGAS NV DISTRIBUTION CENTER

July 23, 2021, 4:22 pm
Arrived at USPS Regional Facility
LAS VEGAS NV DISTRIBUTION CENTER

July 22, 2021, 9:53 pm Arrived at USPS Regional Facility RENO NV DISTRIBUTION CENTER

July 22, 2021, 8:38 pm Accepted at USPS Origin Facility RENO, NV 89521

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FAQs

1 BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA 2 FILED * * * * * 3 AUG 1 6 2021 4 NEVADA STATE BOARD OF MEDICAL EXAMINERS 5 Case No. 21-51633-1 6 In the Matter of Charges and 7 Early Case Conference Date: September **Complaint Against** 2, 2021 @ 10:00 a.m. 8 TAMMY LYNN HANKINS, PA-C, 9 Respondent. 10 11 ORDER SCHEDULING EARLY CASE CONFERENCE¹ 12 TO: Aaron B. Fricke, Esq. 13 General Counsel Nevada State Board of Medical Examiners 14 9600 Gateway Drive Reno, Nevada 89521 15 16 Tammy Lynn Hankins, PA-C 3753 Cherry Tree Blvd. 17 Lake Havasu City, Arizona 86406 18 NOTICE IS HEREBY GIVEN that, in compliance with NRS 630.339(3), an Early Case 19 Conference will be conducted on September 2, 2021, beginning at the hour of 10:00 a.m. The 20 Early Case Conference will be held via conference call. The conference call number is 1-605-475-21 2200 and the access code is 8792457.² 22 23 ¹ The date allotted to file an answer to both the Complaint and the Amended Complaint pursuant to NRS 630.339 has passed, thus this Order is being issued absent an answer having been filed. 24 ² NRS 630.339(3) provides as follows: 25

Within 20 days after the filing of the answer, the parties shall hold an early case conference at which the parties and the hearing officer appointed by the Board or a member of the Board must preside. At the early case conference, the parties shall in good faith:

(a) Set the earliest possible hearing date agreeable to the parties and the hearing officer, panel of the Board or the Board, including the estimated duration of the hearing:

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The scheduled Early Case Conference shall be attended by the parties in person or by any party's legal counsel of record and will be conducted by the undersigned Hearing Officer to discuss and designate the dates for the Pre-Hearing Conference and Hearing and the other procedural matters established in NRS 630.339.

At the Pre-Hearing Conference, in accordance with NAC 630.465,³ each party shall provide the other party with a copy of the list of witnesses they intend to call to testify, including therewith, the qualifications of each witness so identified, and a summary of the testimony of each witness. If a witness is not on the list of witnesses, that witness may subsequently not be allowed to testify at the Hearing unless good cause is shown for omitting the witness from said list.⁴ Likewise, all

(b) Set dates:

- (1) By which all documents must be exchanged;
- (2) By which all prehearing motions and responses thereto must be filed;
- (3) On which to hold the prehearing conference; and
- (4) For any other foreseeable actions that may facilitate the timely and fair conduct of the matter.
- (c) Discuss or attempt to resolve all or any portion of the evidentiary or legal issues in the matter;
- (d) Discuss the potential for settlement of the matter on terms agreeable to the parties; and
- (e) Discuss and deliberate any other issues that may facilitate the timely and fair conduct of the matter.

³ NAC 630.465 provides as follows:

- 1. At least 30 days before a hearing but not earlier than 30 days after the date of service upon the physician or physician assistant of a formal complaint that has been filed with the Board pursuant to NRS 630.311, unless a different time is agreed to by the parties, the presiding member of the Board or panel of members of the Board or the hearing officer shall conduct a prehearing conference with the parties and their attorneys. All documents presented at the prehearing conference are not evidence, are not part of the record and may not be filed with the Board.
- 2. Each party shall provide to every other party a copy of the list of proposed witnesses and their qualifications and a summary of the testimony of each proposed witness. A witness whose name does not appear on the list of proposed witnesses may not testify at the hearing unless good cause is shown.
- 3. All evidence, except rebuttal evidence, which is not provided to each party at the prehearing conference may not be introduced or admitted at the hearing unless good cause is shown.
- 4. Each party shall submit to the presiding member of the Board or panel or to the hearing officer conducting the conference each issue which has been resolved by negotiation or stipulation and an estimate, to the nearest hour, of the time required for presentation of its oral argument.

⁴ In identifying a patient as a witness the parties are cautioned to omit from any pleadings filed with undersigned Hearing Officer any addresses, telephone numbers, social security numbers or other personal information regarding such

evidence, except rebuttal evidence, that is not provided to each party at the Pre-Hearing Conference may also not be introduced or admitted at the Hearing unless good cause is shown.

It is further ordered that legal counsel for the Nevada State Board of Medical Examiners and the Respondent shall keep undersigned Hearing Officer advised of each issue which has been resolved by negotiation or stipulation, if any. At the Early Case Conference the parties must also provide an estimate, to the nearest hour, of the time required for presentation of their respective cases.

ACCORDINGLY, NOTICE IS HEREBY GIVEN that the possible sanctions authorized by NRS 630.352, NAC 630.555, and NRS 622.400 upon a finding of guilt to one or more of the Counts raised in said Board Complaint include the following:

- A. Placement on probation for a specified period on any of the conditions specified in an order issued by the Board;
 - B. Administration of a public reprimand;
- C. Placement of a limitation on Respondent's practice, or exclusion of one or more specified branches of medicine from Respondent's practice;
- D. Suspension of Respondent's license for a specified period or until further order of the Board;
 - E. Revocation of Respondent's license to practice medicine;
- F. A requirement that Respondent participate in a program to correct alcohol or drug dependence or any other impairment;
 - G. A requirement that there be specified supervision of Respondent's practice;
 - H. A requirement that Respondent perform public service without compensation;

individual and to confine their submissions in this regard to the name of the witness, the relevancy of any testimony sought to be elicited from that witness and a summary of their anticipated testimony.

- I. A requirement that Respondent take a physical or mental examination, or an examination testing Respondent's competence;
- J. A requirement that Respondent fulfill certain training or educational requirements, or both, as specified by the Board;
 - K. A fine not to exceed \$5,000.00;
- L. A requirement that the Respondent pay all costs incurred by the Board relating to this disciplinary proceeding, as more fully set forth in NRS 622.400.

DATED this 16th day of August 2021.

By:

Patricia Halstead, Esq. Hearing Officer (775) 322-2244

CERTIFICATE OF SERVICE

I certify that on this day, I personally delivered or mailed, postage pre-paid, at Reno, Nevada, a true file-stamped copy of the foregoing ORDER SCHEDULING EARLY CASE CONFERENCE addressed as follows:

> Aaron B. Fricke, Esq. General Counsel Nevada State Board of Medical Examiners 9600 Gateway Drive Reno, Nevada 89521

Tammy Lynn Hankins, M.D. 3753 Cherry Tree Blvd. Lake Havasu City, Arizona 86406

9171 9690 0935 0252 1562 55

DATED this <u>18th</u> day of August 2021.

Mercedes Frentes
Print
Legal Assistant

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and Complaint

Against:

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TAMMY LYNN HANKINS, PA-C

Respondent.

Case No. 21-51633-1

FILED

AUG 3 1 2021

NEVADA STATE BOARD OF MEDICAL EXAMINERS

PROOF OF SERVICE

I, Mercedes Fuentes, Legal Assistant for the Nevada State Board of Medical Examiners, hereby certify that on August 11, 2021, I sent a filed-stamped copy of the **ORDER SCHEDULING EARLY CASE CONFERENCE**, via U.S. Certified Mail (Tracking No. 9171969009350252156255), postage prepaid, to the last known address of record for Respondent, and was delivered on August 21, 2021. Proof of delivery and service is attached hereto as **Exhibit 1**. *See* NRS 630.344.

DATED this 31st day of August, 2021.

MERCEDES FUENTES

Legal Assistant

Nevada State Board of Medicial Examiners



August 31, 2021

Dear Mercedes Fuentes:

The following is in response to your request for proof of delivery on your item with the tracking number: 9171 9690 0935 0252 1562 55.

Item Details

Status:

Delivered, Left with Individual

Status Date / Time:

August 21, 2021, 12:09 pm

Location:

LAKE HAVASU CITY, AZ 86406

Postal Product:

First-Class Mail®

Extra Services:

Certified Mail™

GI HOWANS

Return Receipt Electronic

Recipient Signature

Signature of Recipient:

Address of Recipient:

CA THE

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Note: Scanned image may reflect a different destination address due to Intended Recipient's delivery instructions on file.

Sincerely, United States Postal Service® 475 L'Enfant Plaza SW Washington, D.C. 20260-0004

USPS Tracking®

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Track Another Package +

Tracking Number: 9171969009350252156255

Remove X

Your item was delivered to an individual at the address at 12:09 pm on August 21, 2021 in LAKE HAVASU CITY, AZ 86406.

Objective Delivered, Left with Individual

August 21, 2021 at 12:09 pm LAKE HAVASU CITY, AZ 86406 Leenbac

Get Updates ✓

Text & Email Updates	~
Return Receipt Electronic	~

Tracking History

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August 21, 2021, 12:09 pm Delivered, Left with Individual

LAKE HAVASU CITY, AZ 86406

Your item was delivered to an individual at the address at 12:09 pm on August 21, 2021 in LAKE HAVASU CITY, AZ 86406.

August 20, 2021, 8:41 pm
Departed USPS Regional Facility
LAS VEGAS NV DISTRIBUTION CENTER

August 18, 2021, 10:59 pm
Arrived at USPS Regional Facility
RENO NV DISTRIBUTION CENTER

August 18, 2021, 9:44 pm Accepted at USPS Origin Facility RENO, NV 89521

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FAQs

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

FILED

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SEP 1 3 2021

NEVADA STATE BOARD OF MEDICAL EXAMINERS

In the Matter of Charges and

Complaint Against

Case No. 21-51633-1

TAMMY LYNN HANKINS, PA-C,

Respondent.

Hearing Date: October 19, 2021 @ 8:30

SCHEDULING ORDER

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

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

On September 2, 2021, an Early Case Conference was conducted in this matter and held via conference call. Participating in the Early Case Conference were Aaron B. Fricke, Esq. on behalf of the Investigative Committee (the "IC") and the undersigned Hearing Officer. Respondent did not appear although the record indicates she was served with the Order Scheduling Early Case Conference, which was filed on August 16, 2021, by and through certified mail that was delivered to Respondent's last known address on August 21, 2021. In the absence of Respondent, relevant dates including, but not limited to, dates for the pre-hearing conference; the exchange of witnesses and documents; motion practice; and the hearing date were discussed and determined.

Accordingly, in compliance with NAC 630.465, a pre-hearing conference will be conducted on SEPTEMBER 16, 2021, beginning at the hour of 3:30 p.m., Pacific Standard Time, and will be held via a conference call. Unless directed otherwise prior to the scheduled date and

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time of the pre-hearing conference, the conference call number will be 1-605-475-2200 and the access code will be 8792457. The parties shall participate in the conference call and the conference will be conducted before the undersigned hearing officer.

By the pre-hearing conference, each party shall provide the other party with a copy of the list of witnesses he or she intends to call to testify, including the witness' qualifications as well as a brief summary of the witness' anticipated testimony. If a witness is not included in the list of witnesses, that witness may not be allowed to testify at the hearing unless good cause is shown. Likewise, all documentation sought to be relied upon at the formal hearing shall be exchanged. If at the formal hearing any party seeks to rely upon documentation not previously produced as ordered, such documentation will not be permitted unless good cause is shown.

Any and all pre-hearing motions shall be served and submitted to the undersigned hearing officer on or before **September 24, 2021**. Any oppositions or responses thereto shall be served and submitted to the undersigned hearing officer on or before **October 5, 2021**. Any and all replies shall be served and submitted to the below hearing officer on or before **October 12, 2021**.

The formal hearing in this matter is hereby scheduled for **October 19, 2021**, starting at 8:30 a.m. Respondent and IC Counsel Aaron Fricke, Esq. shall attend the hearing from the Las Vegas office of the Nevada State Board of Medical Examiners, 325 E. Warm Springs Road, Suite 225, Las Vegas, Nevada 89119. The undersigned hearing officer will attend the hearing from the Reno office of the Nevada State Board of Medical Examiners, 9600 Gateway Drive, Reno, Nevada 89521, and the parties will connect virtually for the hearing.

Following the hearing, the undersigned hearing officer will submit to the Board a synopsis of the testimony taken at the hearing and make a recommendation on the veracity of witnesses if there is conflicting evidence or if credibility of witnesses is a determining factor, and thereafter the Board will render its decision. NAC 630.470.

Unless stipulated to, permission for the remote appearance (that being an appearance not taking place in either of the aforementioned Las Vegas or Reno offices of the Nevada State Board of Medical Examiners) by any witness must be sought from and approved by the undersigned

hearing officer, and any such request shall be in writing and submitted on or before 5:00 p.m. October 12, 2021.

Should the parties deem a status conference necessary at any juncture of the proceeding, they shall coordinate at least three proposed dates and times and may jointly email the undersigned hearing officer with the proposed dates and times and request a status conference and state the basis for the request.

Both parties shall keep the undersigned hearing officer apprised of each issue that has been resolved by negotiation or stipulation or any other change in the status of this case.

IT IS SO ORDERED.

DATED this 2nd day of September 2021.

By:

Patricia Halstead, Esq. Hearing Officer (775) 322-2244

CERTIFICATE OF SERVICE

I hereby certify that I am employed by the Nevada State Board of Medical Examiners and that on the 13th day of September, 2021, I served a file-stamped copy of the foregoing **SCHEDULING ORDER**, via Fed Ex, to the following parties:

TAMMY LYNN HANKINS, PA-C 3753 Cherry Tree Blvd. Lake Havasu City, AZ 86406 Tracking No.: 7747 8254 2489 Respondent

Additionaly, I served by electronic mail, file-stamped copies of the same to:

AARON B. FRICKE, J.D. Nevada State Board of Medical Examiners <u>africke@medboard.nv.gov</u> <u>General Counsel</u>

PATRICIA HALSTEAD, ESQ. phalstead@haldsteadlawoffices.com Hearing Officer

DATED this <u>13</u> day of September, 2021.

MERCEDES FUENTES

Legal Assistant

Nevada State Board of Medical Examiners

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * *

5 | 6 | In the Matter of Charges and

Case No. 21-51633-1

Complaint Against

Hearing Date: October 19, 2021 @ 8:30

a.m.

TAMMY LYNN HANKINS, PA-C,

FILED

Respondent.

SEP 2 0 2021

AMENDED SCHEDULING ORDER

NEVADA STATE BOARD OF MEDICAL EXAMINERS By:

TO:

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Aaron B. Fricke, Esq.

General Counsel

Nevada State Board of Medical Examiners

9600 Gateway Drive Reno, Nevada 89521

Tammy Lynn Hankins, PA-C

3753 Cherry Tree Blvd.

Lake Havasu City, Arizona 86406

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Pursuant to the Scheduling Order filed on September 13, 2021, by the Pre-Hearing Conference, which was scheduled for and held on September 16, 2021 at 3:30 p.m., each party was to provide the other party with all documentation sought to be relied upon at the formal hearing. Based upon concerns expressed by Mr. Fricke on behalf of the Investigative Committee of the Nevada State Board of Medical Examiners (the "IC"), this deadline is extended through September 22, 2021, to allow the IC to redact sensitive and non-material information in the required disclosures such as social security numbers, addresses, etc. As Respondent Haskins did not appear for the Pre-Hearing Conference, no objection was lodged as to the request. If Respondent Haskins raises a related objection in the future, the undersigned Hearing Officer will

consider the same in due course of the proceeding. With the exception of this ruling, the remainder of the Scheduling Order filed on September 13, 2021 remains controlling.

IT IS SO ORDERED.

DATED this 17th day of September 2021.

By:

Patricia Halstead, Esq. Hearing Officer (775) 322-2244

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BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * 3 4 5 In the Matter of Charges and Complaint Case No. 21-51633-1 6 Against: FILED 7 TAMMY LYNN HANKINS, PA-C, SEP 2 1 2021 Respondent. 8 **NEVADA STATE BOARD OF** 9 10 AFFIDAVIT OF MERCEDES FUENTES 11 STATE OF NEVADA) ss. 12 **COUNTY OF WAHOE** 13 I, MERCEDES FUENTES, Legal Assistant at the Nevada State Board of Medical 14 Examiners (Board), hereby deposes and states under penalty of perjury under the laws of the State of Nevada that the following assertions are true and correct to the best of my knowledge, except as 15 to those matters stated upon information and belief and that as to those such matters I believe them 16 17 to be true. At all times herein I was and am employed by the Nevada State Board of Medical 18 1. 19 Examiners (Board) as a Legal Assistant. 20 2. I redacted the exhibits to remove all personal identifying information in accordance 21 with the Hearing Officer's order from the pre-hearing conference. 22 3. On September 21, 2021, I placed for mailing all Exhibits and materials, intended to 23 be used for the upcoming Hearing, on October 19, 2021 9:30 A.M., in 24 Case No. 21-51633-1, to Tammy Lynn Hankins, PA-C (Respondent), at her last known address 25 111 26 /// 27

reported to the Board of 3753 Cherry Tree Blvd., Lake Havasu City, AZ 86406, Fed Ex Tracking No. 28 39 6654 4676

Further your affiant sayeth naught.

By:

MERCEDES FUENTES

Legal Assistant

Nevada State Board of Medical Examiners

SUBSCRIBED and SWORN to before me

this 21st day of September, 2021.

NOTARY PUBLIC



MARGARET F. BYRD Notary Public, State of Nevada

Appointment No. 10-3277-2 My Appt. Expires September 3, 2022

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners 9600 Gateway Drive Reno, Nevada 89501

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

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In the Matter of Charges and Complaint

Against:

TAMMY LYNN HANKINS, PA-C

Respondent.

Case No. 21-51633-1

FILED

SEP 2 1 2021

NEVADA STATE BOARD OF MEDICAL EXAMINERS BV:

PREHEARING CONFERENCE STATEMENT OF THE INVESTIGATIVE

COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

The Investigative Committee (IC) of the Nevada State Board of Medical Examiners (Board) submits the following Prehearing Conference Statement in accordance with NAC 630.465 and the Hearing Officer's Scheduling Order, filed on September 13, 2021.

I. LIST OF WITNESSES

The IC of the Board lists the following witnesses whom it may call at the hearing on the charges in the complaint against Respondent filed herein:

Kim Freidman, CMBI, Investigator
 Nevada State Board of Medical Examiners
 9600 Gateway Drive
 Reno, NV 89501

Ms. Freidman is expected to verify documentary evidence obtained during her investigation of this case and testify regarding her investigation of this matter.

b. Tammy Lynn Hankins, PA-C, Respondent.

Ms. Hankins is expected to testify as to her conduct and respond to the allegations in the Complaint.

c. All witnesses identified by Respondent in her prehearing conference statement and/or in any subsequent amended, revised or supplemental prehearing conference statement, or list of witnesses disclosed by Respondent of persons, she may call to testify at the hearing herein.

II. LIST OF EXHIBITS

The IC of the Board lists the following exhibits that it may introduce at the hearing on the charges and formal Complaint against the Respondent. All exhibits listed in Respondent's prehearing conference statement and any supplement and/or amendment thereof.

EXHIBIT NO.	DESCRIPTION	BATES RANGE (NSBME)
1	Patient A, Vida Spa Medical Records, and Prescription Information	0001-0042
2	Patient B, Vida Spa Medical Records, and Prescription Information	0043-0074
3	Patient C, Vida Spa Medical Records, and Prescription Information	0075-0124
4	Patient D, Vida Spa Medical Records, and Prescription Information	0125-0133
5	Patient E, Vida Spa Medical Records, and Prescription Information	0134-0141
6	Patient F, Vida Spa Medical Records, and Prescription Information	0142-0146
7	Patient G, Vida Spa Medical Records, and Prescription Information	0147-0162
8	Patient H, Vida Spa Medical Records, and Prescription Information	0163-0173
9	Patient I, Vida Spa Medical Records, and Prescription Information	0174-0205
10	Patient J, Vida Spa Medical Records, and Prescription Information	0206-0226
11	Patient K, Vida Spa Medical Records, and Prescription Information	0227-0247
12	Patient L, Vida Spa Medical Records, and Prescription Information	0248-0271
13	Vida Spa Daily Procedure Log for Tammy Hankins, January 1, 2019, through December 14, 2020	0272-0278

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners 9600 Gareway Drive Reno, Nevada 89501 (775) 688-2559

14	Respondent's Arizona Criminal Case, Grand Jury Indictment of Respondent, filed March 1, 2012.	0279-0286
15	Arizona Regulatory Board of Physician Assistants, License and Disciplinary History for Respondent	0287-0296
16	Respondent's Arizona Criminal Case, Order, Change of Plea Hearing, filed September 5, 2013	0297-0298
17	Respondent's Arizona Criminal Case, Order, Judgment & Probation, filed October 2, 2013	0299-0301
18	Respondent's Arizona Criminal Case, Order from Initial Appearance on a Petition to Revoke / Arraignment, filed January 24, 2014	0302-0303
19	Respondent's Arizona Criminal Case, Order, Disposition / Judgment & Sentencing – Prison, filed August 11, 2014	0304-0306
20	Minutes of NSBME Public Meeting, held on March 6, 2020	0307-0321
21	Respondent's Public Licensing Information, NSBME, printed September 9, 2021	0322-0323
22	Business Entity Public Records for Vida Spa LLC, Nevada Secretary of State, printed September 9, 2021	0324-0328
23	Business Licensing Public Records for Vida Spa LLC, Clark County Business Licensing, printed September 9, 2021	0329
24	Cease and Desist, and Citation Letters to Respondent, Vida Spa, et. al, Nevada Board of Pharmacy, dated March 24, 2021	0330-0335
25	Response from Sherman Washington, M.D., to NSMBE Allegation Letter, dated November 16, 2020	0336-0339
26	Response from Salvador Borromeo, M.D., to NSMBE Allegation Letter, dated March 26, 2021	0340-0346
27	Response from Salvador Borromeo, M.D., to Nevada Board of Pharmacy Allegation Letter, dated January 5, 2021	0347
28	Respondent's Licensing and Supervisor Detail Information, NSBME Records, printed September 13, 2021	0348-0350
29	Respondent's Supervising Agreement, and Notice Termination, from Salvador Borromeo, M.D. to NSBME	0351-0352

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners 9600 Gateway Drive Reno, Nevada 89501

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First Allegation Letter from NSBME to Respondent, 30 0353-0357 dated December 15, 2020 Second Allegation Letter and Order for Records 31 0358-0362 from NSBME to Respondent, dated January 29, 2021 Third Allegation Letter and Order for Records from 32 0363-0368 NSBME to Respondent, dated February 22, 2021 Email from NSBME Senior Investigator Don 33 Andreas to Respondent's Address of Record, sent 0369-0371 March 19, 2021 Fourth Allegation Letter and Order for Records from 34 0372-0378 NSBME to Respondent, dated June 28, 2021 First Subpoena Duces Tecum to Vida Spa, dated 35 0379-0382 November 5, 2020 Second Subpoena Duces Tecum to Vida Spa, dated 36 0383-0387 December 3, 2020 Third Subpoena Duces Tecum to Vida Spa, dated 37 0388-0397 May 7, 2021 38 N/A Vida Spa Video No. 1 39 N/A Vida Spa Video No. 2 40 N/A Vida Spa Video No. 3 41 N/A Vida Spa Video No. 4 42 N/A Vida Spa Video No. 5 43 N/A Vida Spa Video No. 6 44 N/A Vida Spa Video No. 7 45 N/A Vida Spa Video No. 8 46 N/A Vida Spa Video No. 9 47 N/A Vida Spa Video No. 10

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners 9600 Gareway Drive Reno, Nevada 89501 (775) 688-2559

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1	48	Vida Spa Video No. 11	N/A
3	49	Vida Spa Video No. 12	N/A
4	50	Vida Spa Video No. 13	N/A
5	51	Vida Spa Video No. 14	N/A
7	52	Vida Spa Video No. 15	N/A
8	53	Vida Spa Video No. 16	N/A
10	54	Vida Spa Video No. 17	N/A
11 12	55	Vida Spa Video No. 18	N/A
13	56	Vida Spa Video No. 19	N/A
14 15	57	Vida Spa Video No. 20	N/A
16	58	Vida Spa Video No. 21	N/A
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DATED this 16 day of September, 2021.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

AARON B. FRICKE, J.D.

General Counsel 9600 Gateway Drive Reno, NV 89521

Tel: (775) 688-2559

Email: <u>africke@medboard.nv.gov</u>
Attorney for the Investigative Committee

9600 Gateway Drive Reno, Nevada 89521

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BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and Complaint

Against:

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TAMMY LYNN HANKINS, PA-C,

Respondent.

Case No. 21-51633-1

FILED

SEP 2 4 2021

NEVADA STATE BOARD OF MEDICAL EXAMINERS By:

PROOF OF SERVICE

I, Mercedes Fuentes, Legal Assistant for the Nevada State Board of Medical Examiners, hereby certify that on the 20th day of September, 2021, I sent a filed-stamped copy of the **AMENDED SCHEDULING ORDER** to Tammy Lynn Hankins, PA-C, at 3753 Cherry Tree Blvd., Lake Havasu City, Arizona 86406 via Fed Ex Priority Overnight, tracking no. 283920505688, delivered on September 21, 2021. *See* Exhibit 1.

DATED this 24th day of September, 2021.

MERCEDES FUENTES

Legal Assistant

Nevada State Board of Medical Examiners

EXHIBIT 1

EXHIBIT 1



TRACK ANOTHER SHIPMENT

2839 2050 5688





Delivered Tuesday, September 21, 2021 at 12:30 pm



DELIVERED

Signature not required **GET STATUS UPDATES OBTAIN PROOF OF DELIVERY**

FROM

TO

Reno, NV US

LAKE HAVASU CITY, AZ US

Travel History

TIME ZONE

Local Scan Time

Tuesday, September 21, 2021

LAKE HAVASU CITY, AZ Delivered 12:30 PM Package delivered to recipient address - release authorized On FedEx vehicle for delivery 10:51 AM LAKE HAVASU CITY, AZ LAKE HAVASU CITY, AZ At local FedEx facility 10:34 AM 4:31 AM PHOENIX, AZ At destination sort facility Departed FedEx hub 3:03 AM OAKLAND, CA Monday, September 20, 2021 9:36 PM OAKLAND, CA Arrived at FedEx hub

Left FedEx origin facility

Shipment information sent to FedEx

Picked up

Shipment Facts

7:40 PM

4:34 PM

2:27 PM

RENO, NV

RENO, NV

TRACKING NUMBER

2839 2050 5688

DELIVERED TO

Residence

TERMS

Shipper

SHIP DATE

9/20/21 ②

SERVICE

FedEx Priority Overnight

TOTAL PIECES

1

PACKAGING

FedEx Envelope

STANDARD TRANSIT

9/21/21 before 12:00 pm ?

WEIGHT

0.5 lbs / 0.23 kgs

TOTAL SHIPMENT WEIGHT

0.5 lbs / 0.23 kgs

SPECIAL HANDLING SECTION

Deliver Weekday, Residential Delivery

ACTUAL DELIVERY

9/21/21 at 12:30 pm

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and Complaint

Case No. 21-51633-1

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FILED

TAMMY LYNN HANKINS, PA-C,

SEP 2 4 2021

Respondent.

NEVADA STATE BOARD OF MEDICAD EXAMINERS By:

PROOF OF SERVICE

I, Mercedes Fuentes, Legal Assistant for the Nevada State Board of Medical Examiners, hereby certify that on the 21st day of September, 2021, I sent a filed-stamped copy of the PREHEARING CONFERENCE STATEMENT OF THE INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS and accompanying redacted EXHIBTS 1-37, with EXHIBITS 38-58 on an electronic USB drive, to Tammy Lynn Hankins, PA-C, at 3753 Cherry Tree Blvd., Lake Havasu City, Arizona 86406 via Fed Ex Priority Overnight, tracking no. 283966544676, delivered on September 22, 2021. See Exhibit 1.

DATED this 24th day of September, 2021.

MERCEDES FUENTES

Legal Assistant

Nevada State Board of Medical Examiners

EXHIBIT 1

EXHIBIT 1



TRACK ANOTHER SHIPMENT

283966544676





Delivered Wednesday, September 22, 2021 at 11:43 am



DELIVERED

Signature not required

GET STATUS UPDATES

OBTAIN PROOF OF DELIVERY

FROM

Nevada State Board of Med Exam Mercedes Fuentes

> 9600 Gateway Drive Reno, NV US 89502 775-324-9380

то

Tammy Lynn Hankins PA-C

3753 Cherry Tree Blvd LAKE HAVASU CITY, AZ US 86406 520-240-5241

Travel History

TIME ZONE
Local Scan Time



Wednesday, September 22, 2021

11:43 AM	LAKE HAVASU CITY, AZ	Delivered Package delivered to recipient address - release authorized	
9:59 AM	LAKE HAVASU CITY, AZ	On FedEx vehicle for delivery	
9:58 AM	LAKE HAVASU CITY, AZ	At local FedEx facility	
4:40 AM	PHOENIX, AZ	At destination sort facility	
3:11 AM	OAKLAND, CA	Departed FedEx hub	
Tuesday Cantambar 21, 2021			

Tuesday, September 21, 2021

10:25 PM	OAKLAND, CA	Arrived at FedEx hub
7:35 PM	RENO, NV	Left FedEx origin facility
4:30 PM	RENO, NV	Picked up

11:37 AM

Shipment information sent to FedEx

Shipment Facts

TRACKING NUMBER

283966544676

DELIVERY ATTEMPTS

1

TOTAL SHIPMENT WEIGHT

3 lbs / 1.36 kgs

SPECIAL HANDLING SECTION

Deliver Weekday, Residential Delivery

ACTUAL DELIVERY

9/22/21 at 11:43 am

SERVICE

FedEx Priority Overnight

DELIVERED TO

Residence

TERMS

Shipper

SHIP DATE

9/21/21 3

WEIGHT

3 lbs / 1.36 kgs

TOTAL PIECES

1

PACKAGING

FedEx Pak

STANDARD TRANSIT

9/22/21 before 12:00 pm ?

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,

SEP 24 2021

Respondent.

NEVADA STATE BOARD OF MEDICAL EXAMINERS

PROOF OF SERVICE

I, Mercedes Fuentes, Legal Assistant for the Nevada State Board of Medical Examiners, hereby certify that on the 21st day of September, 2021, I sent a filed-stamped copy of the **AFFIDAVIT OF MERCEDES FUENTES**, to Tammy Lynn Hankins, PA-C, at 3753 Cherry Tree Blvd., Lake Havasu City, Arizona 86406 via Fed Ex Priority Overnight, tracking no. 283966544676, delivered on September 22, 2021. *See* Exhibit 1.

DATED this 24th day of September, 2021.

MERCEDES FUENTES

Legal Assistant

Nevada State Board of Medical Examiners

EXHIBIT 1

EXHIBIT 1



TRACK ANOTHER SHIPMENT

283966544676









Delivered Wednesday, September 22, 2021 at 11:43 am



DELIVERED

Signature not required

GET STATUS UPDATES

OBTAIN PROOF OF DELIVERY

FROM

Nevada State Board of Med Exam Mercedes Fuentes

> 9600 Gateway Drive Reno, NV US 89502 775-324-9380

то

Tammy Lynn Hankins PA-C

3753 Cherry Tree Blvd LAKE HAVASU CITY, AZ US 86406 520-240-5241

Travel History

TIME ZONE

Local Scan Time



Wednesday, September 22, 2021

11:43 AM	LAKE HAVASU CITY, AZ	Delivered Package delivered to recipient address - release authorized	
9:59 AM	LAKE HAVASU CITY, AZ	On FedEx vehicle for delivery	
9:58 AM	LAKE HAVASU CITY, AZ	At local FedEx facility	
4:40 AM	PHOENIX, AZ	At destination sort facility	
3:11 AM	OAKLAND, CA	Departed FedEx hub	
Tuesday, September 21, 2021			

10:25 PM	OAKLAND, CA	Arrived at FedEx hub
7:35 PM	RENO, NV	Left FedEx origin facility
4:30 PM	RENO, NV	Picked up

9/24/21, 11:39 AM Detailed Tracking

11:37 AM

Shipment information sent to FedEx

Shipment Facts

TRACKING NUMBER

283966544676

DELIVERY ATTEMPTS

1

TOTAL SHIPMENT WEIGHT

3 lbs / 1.36 kgs

SPECIAL HANDLING SECTION

Deliver Weekday, Residential Delivery

ACTUAL DELIVERY

9/22/21 at 11:43 am

SERVICE

FedEx Priority Overnight

DELIVERED TO

Residence

TERMS Shipper

SHIP DATE

9/21/21 ③

WEIGHT

3 lbs / 1.36 kgs

TOTAL PIECES

1

PACKAGING

FedEx Pak

STANDARD TRANSIT

9/22/21 before 12:00 pm ?

1 BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA 2 * * * * * 3 4 **NEVADA STATE BOARD OF** 5 Case No. 21-51633-1 In the Matter of Charges and 6 Hearing Date: October 19, 2021 @ 8:30 7 **Complaint Against** a.m. 8 TAMMY LYNN HANKINS, PA-C, 9 Respondent. 10 11 ORDER CONTINUING SUMMARY SUSPENSION 12 TO: Aaron B. Fricke, Esq. 13 General Counsel Nevada State Board of Medical Examiners 14 9600 Gateway Drive Reno, Nevada 89521 15 16 Tammy Lynn Hankins, PA-C 3753 Cherry Tree Blvd. 17 Lake Havasu City, Arizona 86406 18 A hearing to consider the continued suspension of Respondent Tammy Lynn Hankin, PA-19 C's license pending a formal hearing on this matter was held on September 20, 2021. Appearing 20 for the hearing were Aaron B. Fricke, Esq. on behalf of the Investigative Committee (the "IC") 21 and the undersigned Hearing Officer. Respondent did not appear although she was properly 22 noticed of the proceeding. A proof of service indicating notice of the suspension hearing to 23 Respondent was filed on July 29, 2021. 24 Having heard from Mr. Fricke in regard to the circumstances underlying the initial 25 suspension of Respondent's license and the continued basis therefore, and there being no 26 contradictory evidence presented, the undersigned hearing officer finds as follows.

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FILED

SEP 2 8 2021

Respondent has prior felony convictions out of Arizona for Conspiracy to Obtain a

Dangerous Drug by Fraud, a Class B felony, and Sexual Conduct with a Minor, a Class 6 felony.

Respondent was granted the privilege of probation for the Conspiracy to Obtain a Dangerous

Drug by Fraud conviction, which was revoked based upon the violation of her probation and the subsequent Sexual Conduct with a Minor conviction.

Based upon her prior conviction for Conspiracy to Obtain a Dangerous Drug by Fraud, her training, and her experience, Respondent knew or should have known her legal obligations with regard to maintaining her licensure, administering controlled substances, and safely handling and treating patients.

Despite the same, Respondent knowingly practiced medicine without a license and without proper supervision, improperly dispensed controlled substances, and misrepresented her actions directly to the Nevada Board of Medical Examiners (the "Board") amongst other improper activity that additionally includes, but is not limited to, the abandonment of a patient.

Respondent knowingly violated her obligations as a medical professional and was permitted to do so in that she worked in an environment not licensed for invasive medical procedures, which Respondent undertook, and where the laws and procedures put into place to protect the public were largely ignored.

Respondent's actions have resulted in harm to the public including, but not limited to, the substantial bodily harm to one member of the public in particular.

Respondent has failed to cooperate with the IC in its investigation of her conduct, thus hindering its investigation, and Respondent's whereabouts cannot be confirmed.

Having previously broken the law with respect to her licensure obligations and having practiced medicine without a license and without proper supervision amongst other highly concerning conduct outlined herein and as otherwise addressed at the suspension hearing, the Board is validly concerned about the health, safety or welfare of the public and/or the risk of imminent or continued harm to any patient that may be treated by Respondent.

Based upon the foregoing, good cause appearing, and pursuant to NRS 630.326(2), the undersigned Hearing Officer finds a reasonable basis to continue the suspension of Respondent's license pending the conclusion of a hearing to consider a formal complaint against the licensee.

The formal hearing in this matter remains scheduled for **October 19, 2021**, starting at 8:30 a.m. All prior orders issued in this matter remain in full force and effect.

IT IS SO ORDERED.

DATED this 23rd day of September 2021.

By:

Patricia Halstead, Esq. Hearing Officer (775) 322-2244

CERTIFICATE OF SERVICE

I certify that on this day, I personally delivered or mailed, postage pre-paid, at Reno, Nevada, a true file-stamped copy of the foregoing ORDER CONTINUING SUMMARY SUSPENSION addressed as follows:

> Aaron B. Fricke, Esq. General Counsel Nevada State Board of Medical Examiners 9600 Gateway Drive Reno, Nevada 89521

Tammy Lynn Hankins, M.D. 3753 Cherry Tree Blvd. Lake Havasu City, Arizona 86406 1)5 Ceit Mail:

9171 9690 0935 0252 1570 47

day of September 2021.

Signature

Mercedes Fuentes
Print

Legal Assistant

1	BEFORE THE BOARD OF MEDICAL EXAMINERS
2	OF THE STATE OF NEVADA FILED
3	-000- OCT 1 5 2021
4	NEVADA STATE BOARD OF MEDICAL EXAMINERS
5	In the Matter of Charges and By:
6	Complaint Against:
7	TAMMY LYNN HAWKINS, PA-C Case No. 21-51733-1
8	/
9	Pages 1 to 113, inclusive.
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12	SUMMARY SUSPENSION HEARING
13	
14	Monday, September 20, 2021
15	Reno, Nevada
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21	REPORTED BY: CHRISTINA AMUNDSON
22	CCR #641 (Nevada) CSR #11883 (California)
23	JOB NO: 791380
24	
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	1	APPEARANCES	Page	2
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	4	OFFICE OF THE GENERAL COUNSEL:		
	5	Nevada State Board of Medical Examiners		
	6	9600 Gateway Drive		
	7	Reno, NV 89521		
	8	By: Aaron Bart Fricke, J.D.		
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	11	PATRICIA HALSTEAD, HEARING EXAMINER		
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	13	KIM FRIEDMAN, CMBI, INVESTIGATOR		
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Page 3 1 BE IT REMEMBERED that on September 20, 2021, 2 commencing at 9:00 a.m. of said day, at Nevada State Board of Medical Examiners, 9600 Gateway Drive, 4 Reno, NV 89521, before me, CHRISTINA M. AMUNDSON, a Certified Shorthand Reporter, the following 5 6 proceedings were had: _____ THE HEARING OFFICER: My name's Patricia 9 Halstead, the hearing officer assigned to this 10 matter. This is the charges and complaint against 11 Tammy Lynn Hankins, PA-C. The hearing date for this 12 matter is October 19th, 2021. We're here today for 13 a summary suspension hearing. The date today is 14 September 20th, 2021. 15 Can you all please state your appearances. 16 MR. FRICKE: Thank you, Ms. Halstead. 17 Aaron Fricke, General Counsel, Nevada State Board of 18 Medical Examiners, for the Investigative Committee 19 of the Board. 2.0 THE HEARING OFFICER: You have a witness? 21 MR. FRICKE: Yes. Our witness is Kim 22 Friedman, CMBI, Senior Investigator for the Medical 23 Board. 24 THE HEARING OFFICER: I think I forgot to 25 say the case number. It's 21-51633-1. I note that

- 1 the time is 9:05. Ms. Hankins had notice of this
- 2 hearing. Can you please explain the notice that Ms.
- 3 Hankins was provided.
- 4 MR. FRICKE: Yes. The address of record
- 5 that Ms. Hankins has is Cherry Tree Lane in Lake
- 6 Havasu City, Arizona. We have confirmed that
- 7 address. She was served via certified mailing of
- 8 the order of summary suspension. I'm not sure we
- 9 have that among our exhibits but it's in the
- 10 pleadings that we should have prepared by the time
- 11 that we have the actual hearing.
- Do we have that? Can you print out the
- 13 certificate of service for the summary of suspension
- 14 order. Thank you.
- 15 Proof of service was filed July 29th, 2021.
- 16 She was served on July 20th, 2021, with the order
- 17 of summary suspension and the first amended
- 18 complaint in this matter at her address at 3753
- 19 Cherry Tree Boulevard in Lake Havasu City, Arizona,
- 20 86406. That order contemplates this hearing as
- 21 previously scheduled.
- 22 THE HEARING OFFICER: And that was sent by
- 23 certified mail, correct?
- MR. FRICKE: Yes.
- 25 THE HEARING OFFICER: And someone signed

- 1 for that.
- 2 MR. FRICKE: Yes.
- THE HEARING OFFICER: Or it was signed by
- 4 the -- given COVID.
- 5 MR. FRICKE: Everything comes CV20 or CV19,
- 6 so we don't know anymore, you know, what that means.
- 7 THE HEARING OFFICER: Okay. All right.
- 8 So, I'm going to find that service was appropriately
- 9 made and Ms. Hankins had notice of this matter. It
- 10 is now 9:07 and this matter is taking place in Reno
- 11 in person where I am and Mr. Fricke is and the court
- 12 reporter is. The witness, Ms. Friedman, is in Las
- 13 Vegas. That office is open.
- 14 Ms. Friedman -- I'm asking you because
- 15 you're there -- has there been any sign of Ms.
- 16 Hankins in the building of her appearance for this
- 17 matter since we've commenced the proceeding?
- THE WITNESS: No, ma'am.
- 19 MR. FRICKE: I would note for the record
- 20 the office is open to the public and Ms. Hankins
- 21 could appear there if she wished.
- 22 THE HEARING OFFICER: Okay. Ms. Hankins
- 23 has failed to appear and so we'll commence with the
- 24 proceeding. Mr. Fricke, go ahead.
- 25 MR. FRICKE: Thank you. I'd like to make a

- 1 brief opening statement and then have some testimony
- 2 from our witness and a brief closing.
- THE HEARING OFFICER: Thank you.
- 4 MR. FRICKE: In 2012 the respondent, Ms.
- 5 Hankins, physician's assistant, was disciplined by
- 6 the Arizona Medical Board for unprofessional
- 7 conduct, specifically prescribing or dispensing
- 8 controlled substances which she knew were not
- 9 approved or in excess of the amount authorized,
- 10 conduct harmful or dangerous to the health of a
- 11 patient, failing or refusing to maintain adequate
- 12 records on a patient, and for failing to furnish
- 13 legally requested information to the Arizona Board.
- 14 And in 2012 Ms. Hankins was convicted in a
- 15 criminal proceeding in Arizona of two felonies,
- 16 obtaining a dangerous drug by fraud and sexual
- 17 relations with a minor. She was sent to prison in
- 18 Arizona for more than three years.
- 19 That's to say that Ms. Hankins has been
- 20 down this road before. When she was released, she
- 21 came to Las Vegas sometime, the evidence would
- 22 suggest, in 2019. Unbeknownst to the Board, she
- 23 promptly resumed the practice of medicine without a
- 24 license and without supervision, including invasive
- 25 and dangerous cosmetic surgeries. And in March she

- 1 applied to the Board for a license.
- 2 Just since Ms. Hankins was released from
- 3 prison in Arizona and came to Nevada, she has
- 4 demonstrated a willingness still to do the
- 5 following: To fraudulently prescribe controlled
- 6 substances, to practice medicine without a license,
- 7 to practice medicine without a supervising
- 8 physician, to perform dangerous, invasive cosmetic
- 9 surgeries in a demonstrably unsafe facility without
- 10 accreditation or permitting and without the
- 11 necessary knowledge, training, and skill to inform
- 12 -- to perform invasive surgeries skillfully and
- 13 safely.
- 14 Also, she refuses to cooperate in the
- 15 Board's ongoing investigation of her activities,
- 16 including investigation of a case where she
- 17 seriously harmed a patient in one of these invasive
- 18 cosmetic surgeries. And if that's not bad enough,
- 19 she's demonstrated a willingness to lie to the Board
- 20 itself in a public meeting, right to the Board
- 21 members themselves.
- 22 Simply put, Ms. Hankins has demonstrated an
- 23 inability to act professionally in the state of
- 24 Nevada. She's a continuing danger to the public and
- 25 to any patient or practitioner she happens to come

- 1 across. The evidence demonstrates that she will lie
- 2 and she will cheat, she will obtain prescription
- 3 drugs by fraud, she will break the law. What
- 4 credentials she has she will abuse. Her conduct is
- 5 incompatible with licensure to practice medicine.
- 6 The IC filed its first amended complaint
- 7 against Ms. Hankins on July 20th, 2021, as noted
- 8 previously. That was served upon her with a --
- 9 along with the order of summary suspension. The IC
- 10 reasonably determined at that time that the health
- 11 and safety of the public was at risk of imminent and
- 12 continued harm by Ms. Hankins retaining a license.
- 13 And pursuant to NRS 630.326 the IC suspended her
- 14 license pending this hearing today.
- The purpose of this hearing is to determine
- 16 whether a reasonable basis exists to continue the
- 17 summary suspension pending the conclusion of a
- 18 hearing to consider the IC's first amended
- 19 complaint. That hearing, as noted before, is set
- 20 for October 19th, 2021, less than a month from now.
- 21 Ms. Halstead, members of the Board, there's
- 22 abundant evidence to demonstrate that the summary
- 23 suspension was amply justified and should remain in
- 24 place until this matter is finally adjudicated by
- 25 the Board. And the burden on the respondent of that

- 1 suspension, to the extent that that's even a
- 2 relevant inquiry, is minimal, as she has no
- 3 supervising physician and is, therefore, prohibited
- 4 from practicing medicine anyway, and the period of
- 5 that suspension is very short as this case is
- 6 proceeding with all due speed.
- 7 With that said, the IC would like to call
- 8 Senior Investigator Kim Friedman to first lay a
- 9 foundation for the admission of 58 exhibits that
- 10 evidence the pattern of misconduct of Ms. Hankins
- 11 that we've set forth in our complaint and to
- 12 establish a reasonable basis to keep the suspension
- 13 in place.
- 14 THE HEARING OFFICER: Thank you.
- Go ahead and call your witness.
- MR. FRICKE: Would you please swear the
- 17 witness.
- 18 (Witness sworn.)
- 19 BY MR. FRICKE:
- 20 Q Good morning, Kim.
- 21 A Good morning.
- 22 Q Could you state your name and -- state your
- 23 name and title for the record.
- 24 A Yes. My name is Kim Friedman,
- 25 F-r-i-e-d-m-a-n. I'm a CMBI Senior Investigator for

- 1 the Nevada State Board of Medical Examiners.
- 2 Q And CMBI, that's Certified Medical Board
- 3 Investigator, correct?
- 4 A Correct.
- 5 Q What does CMBI certification entail?
- 6 A It's specified training for the medical
- 7 board investigations that we conduct --
- 8 Q Okay.
- 9 A -- for violations of Malpractice Act.
- 10 Q How many years have you been with the
- 11 board?
- 12 A I've been with the Board just over nine
- 13 years. I was hired June 1, 2012.
- 14 Q And what do you do here?
- 15 A I investigate allegations and violations of
- 16 the Medical Malpractice Act and well as Medicare
- 17 fraud, Medicaid fraud, sexual assault cases.
- 18 Q And so you were the primary investigator
- 19 assigned to investigate the matters presented here
- 20 today?
- 21 A That's correct.
- 22 Q So, these matters pertain, to your
- 23 knowledge, to Ms. Hankins and activities occurring
- 24 at a place called Vita Spa in Las Vegas.
- 25 Is that correct?

- 1 A That's correct.
- 2 Q Okay. So, first, have you reviewed all the
- 3 documents contained in the hearing binder in front
- 4 of you?
- 5 A Yes.
- 6 Q So, the hearing binder -- is this the
- 7 binder that consists of the -- the binder itself
- 8 consisting of 37 exhibits and 397 pages? You've
- 9 reviewed all those documents?
- 10 A Yes, I have.
- 11 Q Thank you. Were all the documents in this
- 12 binder obtained by you in the process of your
- 13 investigation of these matters?
- 14 A Yes, they were.
- 15 Q And are all these documents true, correct,
- 16 and unaltered copies of the documents that you
- 17 obtained?
- 18 A Yes, they are.
- 19 O Great. Also there are 21 videos that are
- 20 referenced in the exhibit list, those being exhibits
- 21 38 through 58. And those, I'll submit for the
- 22 record, are videos that are on the flash drives that
- 23 have been provided to the hearing officer and the
- 24 court reporter.
- 25 Have you viewed all of those videos in

- 1 their entirety, Kim?
- 2 A Yes, I have.
- 3 Q Where did those videos come from?
- 4 A They were downloaded from various social
- 5 media sites of Vita Spa, downloaded by you, Mr.
- 6 Fricke, because I did not have the capability on my
- 7 computer system to download them.
- 8 Q Right. So, all of those videos were
- 9 publicly available on Giselle Platfoot or Vita Spa's
- 10 publicly viewed internet feeds, correct?
- 11 A That's correct.
- 12 Q Those internet feeds were Facebook,
- 13 Instagram or Tik Tok, correct?
- 14 A Correct.
- 15 Q And I'm sorry if I asked. You viewed those
- 16 videos in their entirety, correct?
- 17 A Yes.
- 18 O And all of those videos that we have
- 19 downloaded and are on those flash drives, are the
- 20 true, correct, and unaltered copies of videos that
- 21 you saw on Giselle Platfoot or Vita Spa's publicly
- 22 viewable Internet feeds. Is that correct?
- 23 A Correct.
- Q I'll submit for the record that my computer
- 25 has a Microsoft screen-capture function, which is

- 1 why I did it on my computer. But Kim has submitted
- 2 that those are true and correct copies of those
- 3 videos.
- 4 So, Ms. Halstead, at this time I would move
- 5 to admit all 58 exhibits, 1 through 37 as the
- 6 exhibits in the binders and 38 through 58 as all
- 7 this is evidence of the type commonly relied upon by
- 8 reasonably and prudent persons in the conduct of
- 9 their affairs and they are otherwise not privileged
- 10 and therefore they're admissible pursuant to NRS
- 11 233(b).123, which is the standard of evidence.
- 12 THE HEARING OFFICER: I'll admit Exhibits 1
- 13 through 58.
- 14 MR. FRICKE: Thank you.
- 15 (Exhibits 1 through 58 admitted.)
- 16 BY MR. FRICKE:
- 17 Q Kim, let's just talk about Vita Spa.
- 18 When did you first become aware of the
- 19 facility called Vita Spa?
- 20 A I initially became aware of Vita Spa
- 21 sometime around June of 2019. A complaint was filed
- 22 on another provider who was working at Vita Spa,
- 23 which at that time was at another location. An
- 24 investigation was conducted at that time, an onsite
- 25 inspection was conducted with myself and an

- 1 investigator with the Nevada State Board of
- 2 Pharmacy.
- 3 During that onsite inspection it was
- 4 discovered that Vita Spa, or Giselle Platfoot who
- 5 was there at the inspection had access to and
- 6 control of the controlled substances and dangerous
- 7 drugs. In addition, there were dangerous drugs and
- 8 drugs from another country that are not FDA approved
- 9 in the United States, which were located in the
- 10 refrigerator inside the break room.
- 11 Q And just to correct it -- I'm not sure I
- 12 heard it correctly -- this was June of 2018.
- 13 Is that correct?
- 14 A June of 2019.
- 15 Q Oh, okay. Okay. And at the time there was
- 16 -- that other provider you were referencing, that
- 17 provider is not a party to this proceeding, is not
- 18 mentioned in any of our pleadings. Is that correct?
- 19 A That's correct.
- 20 Q But for the record that provider was a
- 21 surgeon, and so is that correct?
- 22 A That's correct.
- 23 O And so what came of that case?
- 24 A That case was presented to the
- 25 investigative committee and the result, I believe,

- 1 was compiled with additional cases that that
- 2 provider had.
- 3 Q That's correct. Thank you very much.
- 4 So, suffice it to say that you knew that
- 5 Vita Spa existed and that you had some concerns
- 6 about the goings-on there and particularly with
- 7 regard to the holding, the distribution,
- 8 administration of dangerous drugs, correct?
- 9 A That's correct. And Ms. Platfoot was
- 10 advised by the Pharmacy Board how to properly store
- 11 the medications. The provider was also informed on
- 12 how to store the medications by having them locked,
- 13 and the only person who should have the key to those
- 14 medications would be the provider.
- 15 Q Ms. Platfoot, to your knowledge, does she
- 16 hold a license to perform any healing art in this
- 17 state?
- 18 A Not that I'm aware of, no.
- 19 Q So, it's your understanding that Ms.
- 20 Platfoot simply owns the business and is operating a
- 21 business that offers cosmetic surgeries and other
- 22 sorts of services to the public. Is that correct?
- 23 A Correct.
- 24 THE HEARING OFFICER: Can you spell her
- 25 name.

Page 16 1 MR. FRICKE: It's G-i-s-e-l-l-e, 2 P-l-a-t-f-o-o-t. THE HEARING OFFICER: Thank you. 3 4 BY MR. FRICKE: When did you first become aware of 6 allegations related to Ms. Hankins related to Vita 7 Spa in this case? So the board receives received a complaint 9 in October 6th, 2020, a citizen complaint 10 regarding patient care and bodily injury. 11 patient filed a complaint against Ms. Tammy Hankins 12 at Vita Spa at the new location on the Rainbow 13 address. 14 And so this -- you received a complaint 15 about a pretty severe patient injury. Is that correct? 16 17 That's correct. Α Can you tell us about that? 18 Q 19 Α Yes. The allegation on the complaint was 20 the patient had presented to Ms. Hankins at Vita Spa 21 for a liposuction procedure. The date of service 22 was June 27th, 2020. The patient was sedated 23 during the procedure. Upon awakening, following the 24 procedure, Ms. Hankins had already left the 25 facility.

- 1 The anesthesiologist and the RN who
- 2 remained attempted to revive the patient to have her
- 3 removed from the facility to go down to her sister's
- 4 waiting car, even though the patient was not stable,
- 5 blood pressure was very, very low, her heart rate
- 6 was low, her oxygen level was extremely low.
- When they moved the patient downstairs
- 8 before getting into the patient's sister's car, the
- 9 patient passed out in the parking lot. EMS was
- 10 called. EMS transported the patient to Spring
- 11 Valley Hospital where she was later diagnosed with
- 12 perforation of the bowels five times, hernia, and
- 13 sepsis.
- 14 The hospital attempted to contact Vita Spa.
- 15 No one from Vita Spa returned any of the phone calls
- 16 from Spring Valley Hospital, as it was denoted in
- 17 the medical records of Spring Valley Hospital.
- 18 THE HEARING OFFICER: There was diagnosis
- 19 of bowel perforation five times, sepsis -- and I
- 20 believe I was missing one.
- 21 THE WITNESS: Hernia.
- 22 BY MR. FRICKE:
- 23 Q So, this was the result of a vaser
- 24 liposuction procedure done on the abdomen of the
- 25 patient. Is that correct?

- 1 A That's correct.
- 2 Q So, first, did you obtain records from
- 3 Spring Valley Hospital to corroborate this account?
- 4 A Yes.
- 5 Q So, you reviewed all the records from
- 6 Spring Valley Hospital. Is that correct?
- 7 A The record from Spring Valley Hospital as
- 8 well as the EMS records.
- 9 Q Great. Okay. And you received a complaint
- 10 from this patient. Is that correct?
- 11 A That's correct.
- 12 Q Now, this patient's name is not -- this
- 13 patient is not referenced in any of these -- of our
- 14 disclosures, but she is -- you will find her in
- 15 certain requests for records that we've made to Ms.
- 16 Hankins. We have since obtained medical records for
- 17 this patient -- is that correct -- from Vita Spa?
- 18 A That's correct.
- 19 Q But you -- trying to sort of make a
- 20 timeline for the record.
- 21 So, you received that complaint, and
- 22 knowing what you already knew about Vita Spa, what
- 23 concerns did you have based upon this complaint.
- 24 A My concerns were whether or not the
- 25 facility was licensed to perform procedures, what

Page 19 1 medications were onsite, who was prescribing the 2 medications onsite, whether the providers were 3 onsite, what activities were transpiring at the 4 medical spa. And you've actually spoken to this patient. 5 Is that correct? 6 I did speak with this patient. Α This 8 patient also provided an affidavit of who was 9 present in that room and prescribed the medication 10 and what -- basically what transpired that morning. 11 Right. So, specifically this patient Q 12 received some form of propofol sedation. 13 Is that correct? 14 That's correct. And that's indicated by the records of both 15 Q 16 Vita Spa and Spring Valley Hospital? 17 Yes. Α So, you're familiar, Kim, with the Medical 18 Q 19 Practices Act, specifically NRS 630.373. 20 Is that correct? 21 Α Yes. 22 Q What does that say? 23 Practice of medicine is basically to 24 diagnose, treat any ailment --25 I'm sorry. I'm referencing the Q

1 administration of conscious sedation without permit.

- 2 A Oh, I'm sorry. So, the administration of
- 3 conscious sedation needs to be in a facility that's
- 4 licensed and credentialed, in other words, an
- 5 outpatient facility.
- 6 So, it would be through the Clark County
- 7 business licensing and there would have to be
- 8 credentials as well to provide any type of conscious
- 9 sedation.
- 10 Q Is it the Bureau of Healthcare Quality &
- 11 Compliance that issues those permits?
- 12 A They do issue the outpatient facility
- 13 permit, yes.
- 14 Q So, after corroborating the complainant's
- 15 account of what occurred to her by obtaining the
- 16 records from Spring Valley, what did you do next?
- 17 A Made a referral to the Pharmacy Board. I
- 18 wanted them to go in with me as they have the
- 19 jurisdiction over any medications that may be onsite
- 20 or controlled substance prescriptions.
- I also made a referral to the Healthcare
- 22 Quality & Compliance as I had done research on the
- 23 business license and it was established at that time
- 24 that they were still licensed as a cosmetology
- 25 establishment and not as a medical facility.

- 1 Q Okay. And you're aware that cosmetologists
- 2 are actually prohibited by their statute from
- 3 engaging in the practice of medicine.
- 4 A That's correct.
- 5 Q So, as an investigator with your amount of
- 6 experience, these would all be pretty big red flags
- 7 in your mind. Is that correct?
- 8 A Yes.
- 9 Q So, soon after -- let's talk about
- 10 October 27th, 2020 -- what did you do?
- 11 A October 27th, 2020, myself and an
- 12 investigator with the Nevada State Board of Pharmacy
- 13 and an inspector with the Nevada State Board of
- 14 Pharmacy presented Vita Spa at the Rainbow address
- 15 where we conducted an onsite inspection and
- 16 investigation.
- 17 Upon entering the facility, I asked to
- 18 speak with the other, Ms. Platfoot, and asked to see
- 19 the various rooms and including the medication room
- 20 at that facility. The staff member who was with
- 21 Giselle had the key and unlocked the medication
- 22 room. At that time it was established there were no
- 23 licensed providers onsite at the facility. When we
- 24 entered the medication room we immediately noted on
- 25 the counter multiple patient-specific bags of

- 1 controlled substances from a pharmacy called "Santa
- 2 Maria Pharmacy, " which is a compounding pharmacy.
- None of the cabinets were locked and there
- 4 was a refrigerator that was unlocked and inside the
- 5 refrigerator contained multiple vials of dangerous
- 6 drugs, controlled substances, controlled substances
- 7 from various providers which were patient-specific,
- 8 expired drugs, medications that had been punctured
- 9 for use but had not been dated. Once a medication
- 10 is punctured, it has 30 days before expiration.
- 11 There were various surgical supplies and autoclave
- 12 machine.
- 13 THE HEARING OFFICER: I'm sorry. You said
- 14 a what machine?
- 15 THE WITNESS: Autoclave machine.
- 16 THE HEARING OFFICER: What is that for?
- 17 THE WITNESS: It's a machine used for
- 18 sterilization of surgical instruments.
- 19 BY MR. FRICKE:
- 20 Q I'm sorry. Go on, Kim.
- 21 A So, once we passed through the medication
- 22 room, there was a door that led to a procedure room.
- 23 Upon entering the procedure room, it was noted that
- 24 it was very sparse. It was not set up for a
- 25 procedure at that time. The room basically

- 1 contained a procedure bed, a few empty mayo stands,
- 2 an AED machine, which is a defibrillator, and IV
- 3 holders.
- 4 Q I'll ask you specific questions about what
- 5 you just explained.
- 6 So, first a compounding pharmacy, what's
- 7 the difference between a regular pharmacy and a
- 8 compounding pharmacy?
- 9 A Regular pharmacy basically is a CVS, a
- 10 Walgreens or a WalMart. They will order medications
- 11 directly from pharmaceutical companies, which they
- 12 will dispense.
- 13 A compounding pharmacy, they will actually
- 14 mix the medication, create the medication, formulate
- 15 the medication themselves and they will -- the one
- 16 variation is they will deliver the medication or
- 17 controlled substances or dangerous drugs, where
- 18 Walgreens or CVS will not deliver that to an office.
- 19 Q And Santa Maria Pharmacy, the compounding
- 20 pharmacy, they do deliver. Is that correct?
- 21 A That's correct.
- 22 Q All right. And let's just back up for the
- 23 record. Kim, what did you do before you were a
- 24 medical board investigator?
- 25 A I was a surgical tech.

Page 24 And so what do surgical techs do? 1 0 A surgical tech is the individual who Α 3 assists in surgeries. They will gather all the 4 necessary equipment, instruments, they prep the 5 room, and they assist the surgeon throughout the 6 procedure. So, you were a surgical tech for many 8 years. Is that correct? A few years, yes. 10 And so what kind -- as a surgical tech what 0 11 kind of procedures did you assist in? 12 Α Colonoscopies, orthopedic surgery, 13 Hysterectomies. 14 So, pretty much anything. Yes, pretty much anything that came into 15 Α

- 16 the OR, yes.
- 17 That's fair. And where did you work? Q
- 18 Valley Hospital. Α
- 19 Q So, as a surgical technician and as a
- 20 medical board investigator, you're familiar with the
- 21 substances that we're talking about and you have
- 22 actually some personal expertise with these items,
- 23 correct?
- 24 Α That's correct.
- 25 So, what is propofol? Q

1	А	Page 25 Propofol is used for sedation.
2	Q	Thank you. And particularly it's used for
3	surgical	sedation, correct?
4	А	Correct.
5	Q	And
6	А	Go ahead.
7	Q	And it's a dangerous drug?
8	А	Yes.
9	Q	So, you've witnessed personally the
10	administ	ration of propofol on hundreds and hundreds
11 of patients during surgery. Is that right?		
12	А	That's correct. For an example, we use
13	propofol	for colonoscopy. There will be the
14	physician	n, a surgical tech, and an anesthesiologist
15	5 who maintains the patient, the status of the	
16	patient,	the heart rate, the blood pressure, to
17	monitor t	them in case there's an emergency and they
18	need to l	oring the patient out quickly.
19	Q	And they maintain the airway as well,
20	correct?	
21	А	Correct.
22	Q	And so propofol is used for sedation versus
23 other forms of sedatives and painkillers. Why?		
24	What's th	ne particular characteristics of propofol
25 that make it suitable for surgery?		

- 1 A The patient revives faster from propofol
- 2 than other types of sedation and they don't have to
- 3 be intubated during the use of propofol.
- 4 Q Okay. When you did your inspection of Vita
- 5 Spa October 27th, 2020, you found some
- 6 patient-specific midazolam. Is that correct?
- 7 A That's correct.
- 8 Q So, when we say "patient-specific," what do
- 9 you mean?
- 10 A That the prescription for the midazolam was
- 11 written specifically for the patient to be the end
- 12 user.
- 13 Q Okay. And why is that significant?
- 14 A Because the patient should have control and
- 15 possession of this medication if it's written for
- 16 the patient. The only time a clinic or facility
- 17 should have possession of a controlled substance or
- 18 dangerous drugs is if the prescription is written
- 19 for office use only.
- 20 Q So, for office use. So, let's take a bit
- 21 of a hypothetical.
- 22 A physician -- the significance of that
- 23 patient-specific versus office use, if a physician
- 24 were to, let's say, write prescriptions to patients,
- 25 then have the compounding pharmacy like Santa Maria

- 1 then deliver that medication to them directly to
- 2 their office. Could the physician then have what
- 3 they call a general store of medications for general
- 4 dispensing to patients? Does that happen?
- 5 A Yes. And there's a concern for this
- 6 facility itself in reviewing multiple patient
- 7 records and matching them with the medications and
- 8 dangerous drugs and controlled substances that we
- 9 found onsite, what was administered to the patient
- 10 did not match what was actually dispensed to the
- 11 clinic.
- So, that gave concern that they were using
- 13 patient-specific medications on a variety number of
- 14 patients because they had leftover.
- 15 Q So, this practice of using patient-specific
- 16 prescriptions and then either getting them directly
- 17 delivered to that facility or reclaiming them from
- 18 the patient you tell -- prescribed to the patient
- 19 and tell the patient to bring it into the clinic,
- 20 this practice of gathering a general store of
- 21 medications, what's the problem with that?
- 22 A The problem is, in essence, diversion,
- 23 unlicensed individuals having access to and
- 24 possession of dangerous drugs and controlled
- 25 substances when the provider is not receiving the

- 1 medication themselves.
- 2 And in addition, there's a violation of a
- 3 DEA regulation, a provider cannot take back a
- 4 patient's medications unless they are registered to
- 5 do so.
- 6 Q So, have you encountered this before in
- 7 your years as an investigator, this -- obtaining a
- 8 general store of medications for general dispensing
- 9 to patients?
- 10 A I have, yes.
- 11 Q And so you discovered some injectable
- 12 midazolam that was patient-specific at Vita Spa.
- 13 Is that correct?
- 14 A That's correct.
- 15 Q So, it was written -- and those -- that
- 16 midazolam was written by another provider that's not
- 17 referenced in our pleadings. Is that correct?
- 18 A That's correct.
- 19 Q Although, I believe his name may be part of
- 20 the request for records that you sent to Vita Spa.
- 21 Is that correct?
- 22 A Yes.
- 23 Q So, what is injectable midazolam used for?
- 24 THE HEARING OFFICER: Can I ask are we
- 25 going to tie this into Ms. Hankins? I'm curious.

Page 29 1 MR. FRICKE: Yes. 2. THE HEARING OFFICER: All right. MR. FRICKE: These are rather technical 3 4 issues and everyone should be aware of, I think, the 5 gravity of what is occurring here. 6 THE HEARING OFFICER: Okay. MR. FRICKE: But I'll get right to it. 8 BY MR. FRICKE: What is injectable midazolam used for? Sedation and pain. 10 Α Okay. And you spoke to the provider who 11 Q 12 wrote those patient-specific midazolam 13 prescriptions. Is that correct? I spoke to the provider that wrote the 15 midazolam as well as the provider who wrote the 16 controlled substances which were located on the 17 counter from Santa Maria Pharmacy. And what did that provider tell you that he 18 0 19 was using the midazolam for? 2.0 For the liposuction procedure, the vaser Α 21 liposuction procedures for the purpose of sedation. 22 Q Thank you. So, on that day, you mentioned 23 very briefly you spoke to Giselle Platfoot. Tell us about your conversation. 24 Again, you know, Giselle's always been 25 Α

- 1 forthcoming with us. But the pharmacy board again
- 2 informed her that the way she was maintaining the
- 3 storage of medications was incorrect.
- 4 And we had had this conversation before.
- 5 We had serious concerns that her behavior with these
- 6 medications were continuing, that she was in
- 7 violation by having these medications and they
- 8 needed to be locked up and only the provider and
- 9 only a licensed person could have a key and access
- 10 to the controlled substance and dangerous drugs.
- 11 Q Did you speak to Giselle about Ms. Hankins
- 12 on that day?
- 13 A I briefly spoke to Giselle about Ms.
- 14 Hankins. Giselle did state that Ms. Hankins was no
- 15 longer there, that she actually left or was
- 16 terminated following the mishap with the patient who
- 17 was perforated five times.
- 18 Q Thank you. And so right after that -- or
- 19 soon after that inspection, I direct your attention
- 20 to Exhibit 35. What is this document, Kim?
- 21 A This is a subpoena for medical records,
- 22 which was sent to Vita Spa LLC on Rainbow Boulevard
- 23 in Las Vegas, Nevada, in the matter of the
- 24 investigation of Tammy Hankins, PA-C.
- 25 Q So, you sent this on the 5th of November.

- 1 Is that correct?
- 2 A That's correct.
- 3 Q And according to your affidavit of service,
- 4 you mailed a copy via U.S. Postal Service to Vita
- 5 Spa. Is that correct?
- 6 A That's correct.
- 7 Q And you received some records from this
- 8 subpoena. Is that right?
- 9 A Yes. Giselle Platfoot did hand-deliver the
- 10 medical records at that time.
- 11 Q All right. And we'll skip ahead. There's
- 12 another subpoena that was sent, Exhibit 36. This
- 13 was sent on December 3rd, a month later. And
- 14 we'll understand in a moment when I ask you why you
- 15 sent this subpoena.
- 16 And then there's a third subpoena, Exhibit
- 17 37, which item requests very specific patient
- 18 records. You sent all these subpoenas, correct?
- 19 A That's correct.
- 20 Q Okay. So, knowing all of these things now
- 21 that we've reviewed without reviewing them in
- 22 detail, what did you do right after you left Vita
- 23 Spa on October 27th, 2020?
- 24 A The investigator from the pharmacy board
- 25 and myself went to Dr. Salvador Borromeo's office to

- 1 discuss what had transpired. The reason why we went
- 2 there was because his name was the prescribing
- 3 practitioner on all the medications that we found at
- 4 Vita Spa.
- 5 THE HEARING OFFICER: Can you spell is
- 6 that.
- 7 MR. FRICKE: S-a-1-v-a-t-o-r-e,
- 8 B-o-r-r-o-m-e-o.
- 9 THE HEARING OFFICER: Thank you.
- 10 BY MR. FRICKE:
- 11 Q And for the record the hearing officer can
- 12 take public notice of the disciplinary action on Dr.
- 13 Borromeo that was taken just recently via the
- 14 settlement agreement approved at the last board
- 15 meeting in relation to this case.
- 16 So, you went to Dr. Borromeo's office.
- 17 That's in Las Vegas?
- 18 A That's correct.
- 19 Q And you met with Dr. Borromeo?
- 20 A Yes, we did. We met with Dr. Borromeo and
- 21 expressed our concerns of what we had discovered
- 22 when onsite at Vita Spa. At that time I asked Dr.
- 23 Borromeo if he had any medical records from Ms.
- 24 Hankins or any provider at Vita Spa.
- Dr. Borromeo was at his desk. He turned

- 1 around, reached up to the counter behind him,
- 2 grabbed approximately 26 medical records and handed
- 3 them to myself and the investigator from the
- 4 pharmacy board to review.
- 5 We requested that Dr. Borromeo make copies
- 6 of those medical records while we were present in
- 7 the office, which he had his staff do. Dr. Borromeo
- 8 essentially admitted that he was writing
- 9 prescriptions for patients at Vita Spa for
- 10 controlled substance. He knew that Tammy Hankins
- 11 was working there and various other providers were
- 12 working there.
- 13 Initially Dr. Borromeo stated that he had
- 14 examined some of the patients on various days prior
- 15 to their procedures. When Dr. Borromeo was
- 16 pressured to provide further information and
- 17 supporting documentation that he had examined the
- 18 patient, Dr. Borromeo admitted that he does not see
- 19 patients at Vita Spa, that staff members from Vita
- 20 Spa -- unknown, unlicensed staff members would bring
- 21 a fistful of prescriptions that were prefilled to
- 22 Dr. Borromeo and Dr. Borromeo would sign those
- 23 prescriptions.
- 24 Those prescriptions were then delivered to
- 25 Santa Maria Pharmacy. Santa Maria Pharmacy would

- 1 then deliver the controlled substances directly to
- 2 Vita Spa.
- 3 Q Okay. So, these records, the stack of
- 4 records -- just to be clear, you asked him, Do you
- 5 have records from Vita Spa and is it -- are we to
- 6 understand that he literally just reached behind him
- 7 and said, Yeah, I have these records, here you go?
- 8 A Yes, he did.
- 9 Q And you said there were 20-something
- 10 records. But were the records that you obtained
- 11 that day exhibits found in Exhibits 1 through 5 in
- 12 the binder?
- 13 A Yes.
- 14 Q Just to be clear, can we look at Exhibit 1.
- 15 And so this is patient records for Patient A. So
- 16 the record is clear, not all of the pages that are
- 17 in this exhibit were part of the patient records
- 18 that you obtained from Vita Spa. Is that correct?
- 19 A That's correct for Dr. Borromeo.
- 20 Q Right. So, you'll see the printouts from
- 21 Nevada Prescription Monitoring Program, or the "PMP"
- 22 is how we'll refer to it -- as well as documentation
- 23 from pharmacies.
- 24 Where did you obtain that information, Kim?
- 25 A The information from the PMP I ran myself

- 1 and the pharmacy's I was sent requests to various
- 2 Walgreens and CVS and they provided me copies of the
- 3 prescriptions.
- 4 Q So, if we look at Patient A's medical
- 5 records, page 1 through 17 of Exhibit 1 are the
- 6 medical records that you obtained from Dr. Borromeo
- 7 that day. Is that correct?
- 8 A Correct.
- 9 Q And then pages 18 through 42 is the PMP
- 10 information and documentation you obtained from the
- 11 pharmacy, correct?
- 12 A Correct.
- 13 Q So, just looking at this first record, page
- 14 one, Exhibit 1, what is this document, Kim?
- 15 A This is an operative report. This was for
- 16 a liposuction procedure that was performed by Tammy
- 17 Hankins at Vita Spa. The date of service was
- 18 October 10th, 2019.
- 19 Q It has written in here Dr. Washington's
- 20 name. Who is Dr. Washington?
- 21 A Correct. At that time Dr. Washington was
- 22 the medical director of Vita Spa.
- 23 Q "At that time" meaning October of 2019.
- 25 A That's correct.

```
Page 36
 1
            But on page two it looks like this record
        Q
 2 was signed by Dr. Borromeo. Is that right?
 3
        Α
            That's correct.
        0
            As well as by Tammy Hankins.
 5
        Α
            Yes.
            You've seen Tammy Hankins' signature on her
 6
        Q
 7 application for a medical license.
            Is this her signature?
 8
 9
        Α
            Yes.
10
            So, what is significant about -- as an
        0
11 investigator once seeing this record that day what
12 concerns did you have?
            The concerns that I had were the date for
14 the service was October 10th, 2019, and Ms.
15 Hankins did not receive a license with the Board of
16 Medical Examiners until March 6th of 2020.
17
            Because she didn't have a license, she
        0
18 couldn't have a supervising physician at the time.
            Is that correct?
19
2.0
            That's correct. And I -- in the
        Α
21 investigation it was discovered she did not have a
22 supervising physician --
23
        0
            In --
24
            -- at that time.
        Α
25
            THE HEARING OFFICER: I'm sorry.
                                               I just
```

- 1 want to clarify. The application was March 6, 2020?
- 2 MR. FRICKE: No. Her -- I'm sorry. The
- 3 record would reflect her license was approved on
- 4 March 6th, 2020. I believe we received it in
- 5 January of 2020.
- 6 THE HEARING OFFICER: Okay. Then I have
- 7 another question. Sorry. I just want to make sure
- 8 I get my notes correct.
- 9 So, it says the date of the procedure is
- 10 October 10th, 2019, but she signed -- the date
- 11 next to her signature is October 8th, 2019.
- MR. FRICKE: Uh-huh.
- 13 THE HEARING OFFICER: Okay. Just
- 14 confirming. Thank you.
- 15 MR. FRICKE: Yes. Thank you.
- 16 BY MR. FRICKE:
- 17 Q Page three of Exhibit 1, Kim, what is this

18 page?

- 19 A This is patient prescription information.
- 20 This details the patient. The date of the
- 21 prescription info was 10/9/2019. It details the
- 22 medications that were going to be prescribed to the
- 23 patient for that procedure. And it contains Tammy
- 24 Hankins' signature as well as Dr. Washington's DEA
- 25 number.

- 1 Q Okay. So, the prescriptions -- let's just
- 2 note them, are for -- you see halfway down the page,
- 3 "One hour before take" -- in parentheses -- "2:00
- 4 p.m. two pills tramadol 50 milligrams." It also
- 5 says, "POQ6 PRN pain, times 24" -- I'm sorry -- "No.
- 6 24 times 3D." What does that mean to you?
- 7 A So, this is instructing the patient to take
- 8 the tramadol by mouth or as needed for pain six
- 9 times for three days.
- 10 Q Right. So, that's 24 count. But it says
- 11 "One hour before, take 2:00 p.m."
- 12 A Right.
- 13 0 What is that instruction for?
- 14 A Typically when I see that on a
- 15 prescription, it's informing the patient who will be
- 16 undergoing the prescription to take the medication
- 17 as instructed right prior to the procedure.
- 18 O But that instruction isn't consistent with
- 19 the PO Q6 PRN for pain that is being told to the
- 20 pharmacy. Is that correct?
- 21 A That's correct.
- 22 Q So, who, in your mind -- obviously, we know
- 23 that Tammy Hankins signed this document. But who
- 24 probably prepared this -- who wrote all these things
- 25 on this paper?

- 1 A In my estimate and having done
- 2 investigation on Vita Spa for quite some time,
- 3 either Tammy Hankins wrote this or Giselle Platfoot
- 4 wrote it out and Tammy signed it or the RN wrote it
- 5 out and Tammy signed it.
- 6 Q Because there's an interesting thing that
- 7 says, "Notes: And buy a compression garment."
- 8 So, these are -- to write this down is if
- 9 to say this would be giving instructions to the
- 10 patient. So, would this be a note that Giselle
- 11 maybe made that she instructed the patient to buy a
- 12 compression garment?
- 13 A Yes, that's correct. And in my
- 14 investigation in speaking with patients, the
- 15 majority of patients that I spoke with did not see a
- 16 provider at any time prior to the day of the
- 17 procedure. Giselle Platfoot would see the patient
- 18 prior to the procedure and provide this information
- 19 to them.
- 20 Q In the notes it says "Surgery lipo, 10/10
- 21 at 3:00 p.m., arms, axillary, areas surrounding."
- 22 Is your understanding that that would be a
- 23 vaser liposuction procedure done on the arms, right?
- 24 A Yes.
- 25 O To be done at 3:00.

Page 40 1 Α Right. 2 Q All right. And then there's a note here 3 10/9/19, 6:35 p.m. "Done. Pharmacist Emily." What does that mean to you, Kim? To me it says that they faxed this over to 6 the pharmacy for these medications. So, they're writing down that they did it, 0 8 that this is done so it's ready to go. 9 Prescriptions have been made, correct? 10 Yes. Α 11 If we turn to the page -- so there are Q 12 various pharmacy records that you obtained from 13 Walgreens that were for this patient. Is that correct? 14 15 That's correct. Α 16 But if you look at page 39, which is 0 17 Exhibit 1, what is this? 18 Α This is a telephone prescription that was 19 called in. 20 So, this is a record -- so this is the 21 record you obtained from Walgreens, correct? 2.2 Α That's correct. 23 0 Notice the sold date, "10/9/2019." 24 THE HEARING OFFICER: I'll have to take 25 your word for that, because that's completely

```
Page 41
 1 illegible.
 2
            MR. FRICKE: Off to the top on the right.
 3
            THE HEARING OFFICER: Oh, okay. Thank you.
            MR. FRICKE: The store number and
 5 prescription number.
 6
            THE HEARING OFFICER: I see it now.
 7 BY MR. FRICKE:
            Do you see the drug down there, "Tramadol
        Q
 9 50"? Now, I know this is difficult scribble, but
10 you see the ICD 10 code is also written as "E88.1"?
11
            And so the information that is written
12 here, does that comport with the instructions that
13 were written on page three?
14
        Α
            Yes.
            Okay. And it looks like we have a repeat
15
        Q
16 of that on page 40. Page 41 is prescriptions for
17 promethazine and Bactrim, those being the other two
18 medications. Promethazine, is that for nausea, Kim?
19
        Α
            Yes.
20
            Bactrim, is that an antibiotic?
        Q
21
        Α
            That's correct.
22
        Q
            So, this would be nausea medication because
23 she's going to receive some pretty powerful
24 sedatives and aesthetics and want to make sure that
25 she doesn't have too much nausea and then the
```

Page 42 1 Bactrim would be for post-surgical antibiotics. 2. Α That's correct. Independently verified from the 3 0 4 Prescription Monitoring Program report for the 5 Patient A on page 24. So, this information is 6 reported directly from the pharmacy to the PMP that 7 independently verifies that on 10/9/2019 sold, 8 written, 10/9/2019, "Diazepam 10 milligrams, eight 9 for three days." Same prescription, "Tramadol, 10 50 milligrams." Tramadol, that's an opioid. 11 Is that correct? 12 Α That's correct. 13 And Diazepam is benzodiazepine, a sedative, Q 14 correct? 15 Α Correct. On this reported -- page 24, who is 16 Q 17 reported here as the prescriber? 18 Dr. Sherman Washington. Α 19 Q So, that would be the same Sherman 20 Washington that's written on page three. 21 Α That's correct. 22 Q All right. And that's his DEA number. 23 Is that correct? 24 That's correct. Α Okay. So, in your mind there's no doubt 25 Q

- 1 what happened here.
- What occurred based upon these documents?
- 3 A Based upon these documents, Ms. Hankins
- 4 performed a medical procedure without a license to
- 5 practice medicine in the state of Nevada. And
- 6 there's concern that medications were written by an
- 7 unlicensed individual, being Giselle Platfoot, sent
- 8 over to the pharmacy by utilizing another provider's
- 9 DEA number.
- 10 Q Okay. And this is a patient that
- 11 Dr. Washington did not see. Is that correct?
- 12 A That's correct. It was later identified
- 13 through my investigation that Dr. Washington did not
- 14 see any of these patients that the prescription was
- 15 used for.
- 16 Q Just to corroborate that, this is a really,
- 17 really important thing. If we go to Exhibit 25 you
- 18 sent Dr. Washington an allegation letter in this
- 19 case. Is that correct?
- 20 A That's correct.
- 21 Q And Exhibit 25, page 336, is that his
- 22 response to your allegation letter?
- 23 A Yes, it is.
- Q We won't read this whole thing, but with
- 25 response to Allegation No. 1, he was the medical

- 1 director. Allegation 2, "While I was the medical
- 2 director, I became a supervising doctor for Ms.
- 3 Hankins."
- 4 Now, Dr. Washington wasn't actually the
- 5 supervising physician of Ms. Hankins with respect to
- 6 an official supervising agreement with the board.
- 8 A That's correct.
- 9 Q So, a supervising -- a physician's
- 10 assistant cannot practice medicine in the state of
- 11 Nevada under Nevada law unless they have a
- 12 supervising physician on file with the board.
- 14 A That's correct.
- 15 Q And that supervising physician has some
- 16 very formal requirements as to what supervision
- 17 entails. Is that correct?
- 18 A That's correct.
- 19 Q Okay. And we have a termination document
- 20 in here as well we can get to, but he says in the
- 21 second paragraph, "While I agree to supervise Ms.
- 22 Hankins, I specifically told both Vita Spa and Ms.
- 23 Hankins that she could not perform any procedures
- 24 until she provided proof that she was working within
- 25 her scope. I requested the following things, " blah,

- 1 blah, blah.
- 2 "After 30 days I did not request any
- 3 requested materials and, therefore, I rescinded my
- 4 agreement. I never authorized Ms. Hankins to
- 5 perform liposuction or any other procedures. I was
- 6 not aware that Ms. Hankins performed liposuction
- 7 procedures on or about October of 2019. I never
- 8 signed any charts for Ms. Hankins. I was not
- 9 present during any procedures she performed. I was
- 10 not consulted regarding any procedures Ms. Hankins
- 11 performed or participated in during my
- 12 directorship."
- 13 Kim, after your review of all the evidence
- 14 and in your investigation of Dr. Washington's
- 15 involvement, so far as that is written does that
- 16 comport with your understanding of Dr. Washington's
- 17 involvement?
- 18 A Yes, but I still had concerns about his
- 19 response.
- 20 Q What were those concerns?
- 21 A My concern is, having been the medical
- 22 director of Vita Spa, Dr. Washington had previously
- 23 performed procedures at that facility. This was not
- 24 a facility that had just opened. He was aware that
- 25 they were already actively performing procedures at

- 1 that facility. He was aware that they were using
- 2 controlled substance prescriptions for sedation at
- 3 that facility.
- 4 So, I'm having a difficult time stating
- 5 that, no, he was not aware that procedures were
- 6 being formed, that he was not aware that Tammy
- 7 Hankins was performing procedures, and that he was
- 8 not aware that controlled substance prescriptions
- 9 were being written.
- 10 My other concern is, once Dr. Washington
- 11 was confirmed that his DEA number had been
- 12 compromised, he did not contact the pharmacy board
- 13 with concerns of his license being compromised. To
- 14 my knowledge he never contacted DEA to inform them
- 15 that his DEA registration had been compromised, nor
- 16 had Dr. Washington contacted the Metropolitan Police
- 17 Department to file a police report that his DEA
- 18 number had been compromised.
- 19 Q Thank you. In Allegation 3 he said, "I did
- 20 not authorize Ms. Hankins to provide, prescribe
- 21 controlled substances on my behalf for any patient."
- 22 That's what he said in response.
- 23 But based upon the documents, Dr.
- 24 Washington provided his DEA number to Vita Spa.
- 25 Is that correct?

- 1 A Yes.
- 2 Q And so he's saying that he didn't authorize
- 3 these prescriptions and yet he's been confronted
- 4 with evidence that these prescriptions were written
- 5 under his name. Is that right?
- 6 A That's correct.
- 7 Q So, that's why you're concerned that he
- 8 never reported to the pharmacy board, to the DEA, to
- 9 the police that these were fraudulently written,
- 10 misappropriation of his prescribing credentials.
- 11 Is that right?
- 12 A That's correct.
- 13 Q Okay.
- 14 THE HEARING OFFICER: Can I ask a question?
- MR. FRICKE: Please.
- THE HEARING OFFICER: I just want to be
- 17 clear.
- 18 So, if you turn to page three, that's the
- 19 patient prescription info. Then compare that with,
- 20 for example, 39. Isn't the doctor supposed to sign
- 21 the prescriptions? I mean, I realize his name and
- 22 DEA number is on there.
- MR. FRICKE: Yeah.
- 24 BY MR. FRICKE:
- 25 Q Kim, are all these call-in prescriptions?

Page 48 Yes, these are prescriptions that are 1 Α 2 called in. 3 THE HEARING OFFICER: So, they just 4 represent that they have his authority and he's not 5 required to sign anything when they call in? THE WITNESS: That's correct. Because they 7 have his DEA number. THE HEARING OFFICER: Okay. Thank you for 9 helping me with that. 10 BY MR. FRICKE: 11 So, Kim, to drill down on that a little, Q 12 have you seen cases where there has been a 13 misappropriation of someone's prescribing 14 credentials where the prescriber had no knowledge of 15 it? 16 Α Yes. You can obtain a DEA number from, for 17 0 18 example, a preprinted prescription that you happen 19 to have. Is that right? 2.0 That's correct. Α 21 0 So, it's possible that Vita Spa completely 22 misappropriated his -- Dr. Washington's DEA number 23 in this case. Is that right? 24 A It is possible. But, however, let's look at at Dr. 25 Q

Page 49 1 Washington's response. Again, page 25 --2 THE HEARING OFFICER: Exhibit 25. MR. FRICKE: Sorry. Exhibit 25. 3 4 BY MR. FRICKE: It's page 338 and 339. What is -- so this 6 is -- Kim, is this a document that you received from 7 Dr. Washington in response to your allegation 8 letter? Yes, it was. Α 10 This was just an attachment to that email, Q 11 right? 12 Α That's correct. And was this document -- what does this 13 0 14 document purport to show? 15 The termination of the agreement between Α 16 Tammy Hankins and Sherman Washington. 17 And the date is November 1, 2019? Q 18 Α Correct. 19 Q We assume that's signed by him. Did the 20 board ever actually receive any documentation of a 21 termination with Ms. Hankins around November 2019? No. I verified with Licensing that, not 23 only did we not receive a termination, they never 24 received an initial supervising agreement between

25 Tammy Hankins and Dr. Washington.

- 1 Q And it would have been an absurdity for us
- 2 to receive a supervising agreement with Dr.
- 3 Washington and Tammy Hankins, correct?
- 4 A Yes.
- 5 Q Why would it be absurd?
- 6 A Oh, if we had received one, we would have
- 7 Bates-stamped it the day we received it and sent a
- 8 copy to Dr. Washington verifying that we have the
- 9 agreement between the two of them.
- 10 THE HEARING OFFICER: Are you getting at
- 11 the fact that she was not licensed?
- MR. FRICKE: Yes.
- 13 BY MR. FRICKE:
- 14 Q In November 2019 she was not licensed.
- 15 A That's correct.
- 16 Q So, it made no sense. Based upon that, do
- 17 you believe that Dr. Washington actually ever sent
- 18 this to us?
- 19 A No, I do not.
- 20 Q Okay. And so Dr. Washington in his
- 21 statement admits he's the medical director of Vita
- 22 Spa. He also admits he was being paid. What do you
- 23 think Dr. Washington -- I'm sorry. To your
- 24 knowledge does Dr. Washington have another practice,
- 25 his own private practice?

- 1 A Yes, Dr. Washington does have another
- 2 private practice.
- 3 Q So, have you ever seen any evidence
- 4 whatsoever from any investigation of Vita Spa that
- 5 Dr. Washington was working at Vita Spa with Tammy
- 6 Hankins on any -- on any of the patients that she
- 7 was serving?
- 8 A No. I only have evidence that Dr.
- 9 Washington provided procedures at Vita Spa prior to
- 10 Tammy Hankins even being employed by Vita Spa.
- 11 Q We have evidence that prescriptions were
- 12 written by Dr. Washington -- sorry -- in Dr.
- 13 Washington's credentials and that -- for patients
- 14 that Tammy Hankins was providing services to while
- 15 she had no license. Is that right?
- 16 A That's correct.
- 17 Q Okay. And also that Dr. Washington was
- 18 getting paid during this period.
- 19 A That's correct.
- 20 Q Okay. Let's go back to -- let me just ask
- 21 you a specific question. Is it a violation of the
- 22 Nevada Medical Practices Act for an unlicensed
- 23 person who has no license to prescribe dangerous
- 24 drugs or controlled substances, to examine a
- 25 patient, diagnose a patient, then use the

- 1 credentials of another licensed practitioner to
- 2 write scripts in that practitioner's name and then
- 3 pass that prescription off as if they were the
- 4 lawful prescriber who wrote the script?
- 5 A That's correct, that's a violation.
- 6 Q In particular, it's problematic because the
- 7 prescriber doesn't have a bona fide patient
- 8 relationship?
- 9 A Correct.
- 10 Q Because you can't simply loan your
- 11 prescribing credentials out to even other licensed
- 12 providers. Is that correct?
- 13 A That's correct. The provider has to have
- 14 hands on, bona fide patient-physician relationship
- 15 with the patient to diagnose, treat, and prescribe
- 16 to that patient.
- 17 Q Okay. So, again, after being informed now
- 18 in writing that prescriptions went out written by
- 19 Tammy Hankins for her patients on Dr. Washington's
- 20 DEA number and under his pharmacy license, Dr.
- 21 Washington didn't complain to anybody.
- 23 A That's correct. To date I have not heard
- 24 anybody confirm that he has filed concern or
- 25 complaint of his DEA registration being compromised.

- 1 Q Let's compare that to what happened with
- 2 Dr. Borromeo, Exhibit 29, Bates-stamped 351.
- 3 Kim, is this the standard physician
- 4 assistant's supervision form from the board?
- 5 A Yes, it is.
- 6 Q And there's a certification here, and also
- 7 it says at the bottom of the third paragraph,
- 8 "Further, this relationship will not begin until I
- 9 am in receipt of a file-stamped copy of this
- 10 notification bearing the receipt stamp of the board
- 11 thereon."
- 12 What do you understand that this form is to
- 13 be used for?
- 14 A This form is to confirm the supervising
- 15 physician agreement between the supervising
- 16 physician and a physician assistant. It's also
- 17 informing the applicant that the supervising
- 18 physician agreement is not enforced until they
- 19 receive a stamped copy from the medical board.
- In this instance, although the signatures
- 21 were June 1st, the stamped copy was not received
- 22 by them until June 8th. Therefore, they could not
- 23 be a supervising physician until that June 8th
- 24 date.
- Q Why is it necessary for -- does Licensing

- 1 have to do a check?
- 2 A That's correct. We need to make sure that
- 3 all parties are properly licensed.
- 4 Q Right. And that there's not too many PAs
- 5 being supervised by the same physician, et cetera,
- 6 because there's a limit?
- 7 A Right.
- 8 Q Right. So, and under Nevada law a
- 9 physician's assistant cannot practice until the
- 10 supervision agreement has been approved and returned
- 11 to them. Is that right?
- 12 A That's correct.
- 13 Q Okay. So, specifically this is a
- 14 supervision agreement between Salvador Borromeo and
- 15 Ms. Hankins at Vita Spa, and this would have been
- 16 effective on or after June 8th, 20.
- 17 Is that right?
- 18 A That's correct.
- 19 Q And then the next page 352, what is this
- 20 form?
- 21 A This is a termination of supervising
- 22 agreement between Tammy Hankins and Salvador
- 23 Borromeo.
- 24 Q And this is, again, our standard form.
- 25 And what does this form indicate?

- 1 A This is indicating that Dr. Borromeo
- 2 submitted this termination of agreement and the
- 3 Nevada State Board of Medical Examiners received it
- 4 and it was officially stamped on November 2, 2020,
- 5 which means at that time Tammy Hankins no longer had
- 6 a supervising physician agreement in place with any
- 7 physician.
- 8 Q But there's a discrepancy between the date
- 9 we received it versus the date that he can -- that
- 10 Dr. Borromeo, it appears, claims that he terminated
- 11 his supervising.
- 12 There's a date here of July 1st, 2020.
- 13 But he only signed it October 28th, 2020, and then
- 14 we didn't receive it until November 2nd.
- 15 A Correct.
- 16 Q How can you account for that discrepancy,
- 17 Kim?
- 18 A It is my belief that the reason why Dr.
- 19 Borromeo put the date of 7/1/2020 is because that
- 20 was shortly following the incident with the patient
- 21 that was perforated.
- 22 October 8th, 2020, is a reflection to
- 23 that's the day following the onsite inspection that
- 24 the investigator of the pharmacy board and myself
- 25 had with Dr. Borromeo in his office regarding

- 1 concerns of activities at Vita Spa and Tammy
- 2 Hankins.
- 3 Q Thank you. So, alerted to the concerns of
- 4 the medical board regarding Ms. Hankins and Vita
- 5 Spa, Dr. Borromeo submits a termination that is
- 6 backdated to try to cut off any responsibility he
- 7 might have for Ms. Hankins' activities, correct?
- 8 A That's correct.
- 9 Q Under the Medical Practices Act -- and I'm
- 10 sorry -- again, a physician assistant is deemed the
- 11 agent of the supervising physician, correct?
- 12 A That's correct.
- 13 Q And the supervising physician is
- 14 responsible professionally for all the medical
- 15 activities of their supervisee. Is that correct?
- 16 A That's correct.
- 17 Q Okay.
- 18 THE HEARING OFFICER: Can I -- can I ask
- 19 another question, because I want to understand.
- Is the medical doctor supposed to -- I
- 21 mean, so in the procedure that we're complaining
- 22 about, who was in the room when the procedure was
- 23 done? Are you going to get to this? Because I'm
- 24 curious because it's sort of -- we've gone around
- 25 it.

Page 57 1 Well, we can get to it to the MR. FRICKE: 2 extent we can. I mean, obviously, Kim wasn't 3 personally there. THE HEARING OFFICER: Right. Well, this is 5 my general question. Does the supervising doctor 6 need to be in the room when the procedure is done or 7 does the supervising doctor vouch for the person and 8 say they can do this procedure and I'm vouching for 9 them with my supervision? 10 MR. FRICKE: That would require a medical 11 opinion, but -- or legal opinion. 12 The statute requires that a supervising 13 physician have a program of supervision. 14 certain minimum requirements. That program of 15 supervisions is articulated both in the NRS and the 16 NAC regarding supervision, but generally it entails 17 that they do monthly in-person reviews, that they 18 treat persons together for a certain period, that 19 there be a representative sample of charts that are 20 reviewed, and that physician and physician assistant 21 relationships can range from the traditional, which 22 is a physician's assistant in the same office of a 23 supervising physician treating patients together in 24 tandem, which was the conventional way of looking at

25 it, all the way to physician assistants who act

- 1 independently and, for all practical purposes, hang
- 2 out a shingle, open an office and say, I'm a
- 3 physician assistant.
- 4 And then they pay a supervising physician
- 5 to supervise them, air quotes, where that
- 6 supervising physician, hopefully, is maintaining
- 7 that program of supervision. They also have to
- 8 maintain documentation of that program.
- 9 THE HEARING OFFICER: Okay.
- 10 MR. FRICKE: And it's important to
- 11 recognize that the supervising physician under law
- 12 be personally, professionally responsible for what
- 13 their PA does.
- 14 THE HEARING OFFICER: Right. I was looking
- 15 for a bright line. Like, was he required to be in
- 16 the room or not. But there's no bright line, is
- 17 what I understand.
- 18 MR. FRICKE: There's not. A physician
- 19 assistant is not a medical assistant. A medical
- 20 assistant is an unlicensed person by definition.
- 21 The physician's assistant is a licensed professional
- 22 that cannot practice without a supervising
- 23 physician. So, it was not necessary for -- I mean,
- 24 under -- legally as a bright line rule for a
- 25 physician's assistant to their have supervisor

- 1 present.
- 2 However, that's rarely done in practice and
- 3 there are very large dangers apparent from having a
- 4 PA who doesn't have the same schooling, doesn't have
- 5 the same riggers doing invasive liposuction
- 6 procedures at an unlicensed, unpermitted facility,
- 7 et cetera.
- 8 THE HEARING OFFICER: Thank you.
- 9 MR. FRICKE: Okay.
- 10 THE HEARING OFFICER: Thank you, Ms.
- 11 Friedman, for indulging me.
- 12 THE WITNESS: That's okay.
- MR. FRICKE: But, in fact, she did not have
- 14 a supervising physician and it's written
- 15 specifically on that supervising agreement that you
- 16 cannot practice until you receive this back.
- 17 BY MR. FRICKE:
- 18 Q So, let's get back to Dr. Borromeo's
- 19 response, Exhibit 29. Exhibit 26.
- Is it your understanding, Kim, that you on
- 21 behalf of the investigative committee and the
- 22 pharmacy board both sent allegation letters to Dr.
- 23 Borromeo?
- 24 A Correct.
- 25 Q And Exhibit 26, page 340, 341, 342, what is

1 this document?

- 2 A This is Dr. Borromeo's response to the
- 3 medical board allegations.
- 4 Q And in this response on page 341 you see
- 5 Dr. Borromeo's response?
- 6 A Yes.
- 7 Q Let's go down to paragraph four. He said,
- 8 "Pursuant to the agreement, they were to keep all
- 9 medical records at their facility. My role was
- 10 supposed to be limited to that of a consultant and
- 11 it was my understanding that the cosmetic procedures
- 12 were non-invasive ones that were being performed by
- 13 properly licensed individuals. In addition, we did
- 14 not discuss to me writing or authorizing any
- 15 prescriptions, so I presumed that they already had
- 16 someone who was doing so, if needed. I had agreed
- 17 to be paid \$3,000 per month for what I believe was
- 18 going to be one day per month of consultation work
- 19 at the spa. We didn't agree to a start date."
- I understand that we're in a summary
- 21 suspension hearing and there's a lot to go into that
- 22 we could demonstrate this, but on page 344 you see
- 23 he sent in a copy of his medical director agreement
- 24 with Vita Spa. Is that correct, Kim?
- 25 A That's correct.

- 1 Q And I want to compare that to Exhibit 27
- 2 page 347. He gave a slightly different answer to
- 3 the pharmacy board when asked about these
- 4 prescriptions, didn't he, Kim?
- 5 A Yes, he did.
- 6 Q And in this he says to the investigator for
- 7 the pharmacy board, "While acting as medical
- 8 director for the month of June, I have prescribed
- 9 controlled substances for their patients that will
- 10 undergo invasive procedures as part of their
- 11 conscious sedation and pain control."
- 12 What does that statement mean to you, Kim?
- 13 How is it significant?
- 14 A It's significant because the facility
- 15 wasn't licensed, first of all, for performing
- 16 sedation procedures. It's also that Dr. Borromeo
- 17 was deceptive with his response with the medical
- 18 board in his response to us. He had changed his,
- 19 basically, explanation from the time we investigated
- 20 him and spoke with him onsite where he admitted he
- 21 did it and then he denies he was writing
- 22 prescriptions and then he admitted to the pharmacy
- 23 board he did write prescriptions.
- In addition this tells me that Tammy
- 25 Hankins had access to control, possession, and

- 1 administered controlled substances while she was
- 2 onsite at the facility.
- 3 Q Thank you. It says -- also just to
- 4 continue -- "The prescriptions for these controlled
- 5 substances were given to me with the name of the
- 6 individual patients with corresponding medications
- 7 and doses written by Vita Spa's nurse or medical
- 8 assistant for my approval and signature."
- 9 That sentence, what's wrong with that, Kim?
- 10 A Dr. Borromeo did not have a
- 11 patient-physician relationship with the patients to
- 12 whom he was prescribing controlled substances.
- 13 Q Okay. These are patients that are
- 14 scheduled to undergo procedures for the following
- 15 day. "The written prescriptions are then brought to
- 16 pharmacy Santa Maria which delivers the medications
- 17 directly to" -- strike that -- "the written
- 18 prescriptions are then brought to Pharmacy Santa
- 19 Maria which delivers the medications to Vita Spa
- 20 location. The medications which are accepted by the
- 21 Vita Spa facility are then administered to the
- 22 patient shortly before the scheduled procedure."
- What's wrong with that, Kim?
- 24 A Unlicensed individuals with access and
- 25 possession and control of the controlled substances.

- 1 Q Is it also a problem that you have
- 2 unlicensed individuals administering controlled
- 3 substances to patients?
- 4 A That's correct.
- 5 Q And it says, "This is done by the nurse
- 6 assisting with the procedure or by Dr. MaryAnn
- 7 Phillips, who was an employed by the Vita Spa."
- 8 Why -- let's break those out. Why is that
- 9 problematic?
- 10 A The issue is with Dr. Phillips and the RN.
- 11 Typically if a physician wants a nurse to administer
- 12 medication prior to a procedure, they will write an
- 13 order. The medical records that I reviewed did have
- 14 Dr. Borromeo's name on the order. Dr. Borromeo,
- 15 however, stated that he never wrote an order for any
- 16 of the patients at Vita Spa.
- 17 Q Right. So, nurses can administer dangerous
- 18 drugs and controlled substances with an order from a
- 19 physician. That is correct?
- 20 A Correct.
- 21 Q But there's no orders here.
- 22 A Correct.
- 23 Q Secondly, with respect to Dr. Phillips,
- 24 does Dr. Phillips herself have a controlled
- 25 substance license?

Page 64 1 She does not. Α 2 Or a DEA registration? Q She does not. 3 Α Has Ms. Phillips been disciplined by the 5 board repeatedly, had her license in another state 6 revoked, and had her CS license surrendered? Α That's correct. And that's a terribly compound question, 0 9 but it's trying to skip forward. Exhibit 24, if I can direct your attention 10 11 there, page 330 through 335, what are these 12 documents, Kim? These are cease and desist patient orders 14 from the Nevada State Board of Pharmacy for Giselle 15 -- excuse me. Vita Spa received a cease and desist 16 order. Tammy Hankins, PA-C, received a cease and 17 desist order and Dr. Maryann Phillips received a 18 cease and desist order. 19 0 Page 332 says that the pharmacy board has 20 determined that you are possessing, administering, 21 prescribing and/or dispensing controlled substances 22 and/or dangerous drugs from your practice in 23 violation of federal and state law. Specifically 24 you do not have a controlled substance registration. 25 You are prohibited from possessing and/or

Page 65 1 administering controlled substances and/or dangerous 2 drugs." Does that comport with your understanding, 3 4 Kim? 5 That's correct. Q All right. And also for Dr. Phillips, the 7 same thing. She doesn't have a CS registration and 8 can't possess and administer these drugs either. I probably have 40 minutes more. 10 THE HEARING OFFICER: Okay. I wouldn't 11 mind a quick break, if that's okay. 12 (Recess taken.) 13 THE HEARING OFFICER: We're back on the 14 record in Case 2151633-1 in the matter of the 15 charges and complaint against Tammy Lynn Haskins, 16 PA-C. We took a break for a couple minutes. It is 17 now ten: 35. I remind, Ms. Friedman, that you 18 remain under oath. 19 Go ahead and continue, Mr. Fricke 2.0 MR. FRICKE: Thank you. 21 BY MR. FRICKE: Q So, Kim, let's go back to following your 23 meeting with Dr. Borromeo. You have these records 24 now, the stack of records, and you're looking at

25 these records. Let's go back to page three of

- 1 Exhibit 1.
- 2 In the middle of the page you see this
- 3 instruction: "One hour before, take 2:00 p.m."
- 4 So, does this indicate to you that Ms.
- 5 Hankins is writing a prescription for pain
- 6 post-surgical, but then she's contravening that
- 7 instruction but telling the patient to take two
- 8 pills of tramadol and one pill of Valium
- 9 prophylactically before the surgery? Is that what
- 10 Ms. Hankins is doing here?
- 11 A That's what it appears she has done, yes.
- 12 Q All right. And as opposed to giving
- 13 propofol, which is a medication designed for surgery
- 14 in your experience, Ms. Hankins is using
- 15 prescription tablet medications and opioid and
- 16 benzodiazepines for surgical sedation?
- 17 A That's what it appears. That's correct.
- 18 Q So, look at Exhibit 2 for Patient B. This
- 19 is another operative report. Is that correct, Kim?
- 20 A That's correct.
- 21 Q And not to go into it in too much depth, it
- 22 describes liposuction of arms. Is it your opinion,
- 23 basically, all the same violations of Exhibit 1
- 24 occurred with respect to Patient B in Exhibit 2?
- 25 A That's correct.

Page 67 1 THE HEARING OFFICER: Can we go back to 2 page three. So, you implied she didn't use the 3 propofol for the procedure but instead the tramadol 4 and Valium ahead of procedure in tablet form. Do we know that for a fact? 5 MR. FRICKE: Well, this is their record. 6 THE HEARING OFFICER: Earlier in the 8 hearing you said that they had drugs that were 9 locked up in other patients' names. Do we actually 10 know what she used during the procedure? 11 MR. FRICKE: Well, I would say the records 12 indicate that with respect to this procedure what 13 was used was tramadol and Valium. Propofol may have 14 been used in addition. That said, Kim can clarify. 15 BY MR. FRICKE: 16 Kim, when did you discover -- first find Q 17 propofol at Vita Spa? We did find one box of propofol while you 19 were onsite at the October 27th, 2020, inspection, 20 but it was not later. It was not until later in 21 June of 2021 where we discovered it was actually 22 propofol onsite being administered. 23 In addition, when I pull records from the 24 two pharmaceutical companies that provided the

25 propofol, it did not date back to this timeline.

- 1 THE HEARING OFFICER: Thank you.
- 2 BY MR. FRICKE:
- 3 Q So, they may have had some propofol but we
- 4 don't have much evidence of it being there at this
- 5 time.
- 6 A At this time, this earlier date.
- 7 O October of 2019, the records from Tammy
- 8 Hankins signed by her indicate that she used
- 9 prescription tablet -- patient-specific tablet
- 10 medication for procedural sedation at Vita Spa.
- 11 Is that correct?
- 12 A Correct.
- 13 Q Okay. And and for Patient B, Patient C --
- 14 Exhibit 3 -- Patient D -- Exhibit 4 -- Patient --
- 15 Exhibit 5, all of these in similar fashion.
- 16 And let's actually look at Patient D, which
- 17 is Exhibit 4., page 126. Patient D, similar
- 18 operative report. Is this right, Kim?
- 19 A Yes, correct.
- 20 Q What's significant about -- what kind of
- 21 procedure did this patient receive?
- 22 A This patient received liposuction of the
- 23 abdomen and medial inferior upper arms.
- Q Okay. So, let's just -- I'd like to show
- 25 you a short video from the videos we have.

Page 69 (Video played.) 1 2 BY MR. FRICKE: Kim, you've obviously seen this video many 3 0 4 times. What is Giselle Platfoot doing when she's 6 reciting the telephone number in Spanish? What do 7 you understand that this video is being used for? It's being used to basically sell her Α 9 services to the public on -- I believe that was 10 Facebook on this one. 11 Okay. So, is this an abdominal liposuction 12 procedure? 13 Yes, it is. 14 Kim, in the hundreds of surgeries you 15 personally observed as a surgical tech, can they be 16 -- is this a kind of procedure that can be performed 17 without sedation? This is a very painful procedure, so it 19 would be very difficult to nearly impossible to 20 perform this procedure without some sort of 21 sedation. And it would also be very unsafe to perform 23 it without sedation, correct? 24 Α That's correct. I mean, you're in the 25 abdominal area. If the patient were to move or

- 1 flinch, it could result in perforation of bowels.
- 2 Q Okay. I'll state for the record this is
- 3 Exhibit -- it's the 14th in the series of videos.
- 4 THE HEARING OFFICER: So --
- 5 MR. FRICKE: Video No. 14, Exhibit 51.
- 6 THE HEARING OFFICER: Ms. Platfoot was
- 7 talking --
- 8 BY MR. FRICKE:
- 9 Q I'm sorry.
- 10 Kim, whose voice is on the tape?
- 11 A Giselle Platfoot.
- 12 THE HEARING OFFICER: Did we establish who
- 13 is doing the procedure?
- MR. FRICKE: Not yet.
- 15 THE HEARING OFFICER: Okay.
- 16 BY MR. FRICKE:
- 17 Q Kim, this operating suite, to the extent
- 18 you can see it, where is this operation being done?
- 19 A It appears to be done in the Rainbow
- 20 location.
- 21 Q And this is the operating room that you saw
- 22 on your subsequent investigation -- I'm sorry.
- 23 We're trying to rush -- on a subsequent date you
- 24 inspected the Vita Spa facility. Let's talk about
- 25 that day.

- 1 When did you -- you went in for a followup
- 2 inspection to Vita Spa. Is that correct?
- 3 A That's correct. And we had concern that
- 4 there was the use of propofol at this time now so I
- 5 went with the Bureau of Healthcare Quality
- 6 Compliance two inspectors on June 23, 2021, to
- 7 inspect the facility. We arrived at 10:00 in the
- 8 morning, which is when Vita Spa opened.
- 9 When we arrived we discovered that the
- 10 procedure room had been moved to the back of the
- 11 facility. There was a patient prepped and draped,
- 12 ready for procedure. The RN informed us that a
- 13 liposuction procedure for that patient was scheduled
- 14 for that morning, which would be performed by
- 15 Dr. Maryann Phillips. The procedure room was
- 16 prepped and ready for that procedure including the
- 17 bed being prepped, the liposuction machine being
- 18 prepped, the cannulas on the mayo stand and also two
- 19 vials of propofol on the mayo stand. One was full
- 20 and one was empty, already being pre-drawn into
- 21 syringes.
- 22 Q I'll skip forward. You see the date here
- 23 where my cursor is highlighting on the top right?
- 24 This is February 16th. It would be this year 2021.
- 25 Is that correct?

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Page 72
 1
        Α
            Correct.
 2
        Q
            I'll skip forward in the video.
            (Video played.)
 3
 4 BY MR. FRICKE:
            Kim, who is that speaking?
        Α
            Her name is Kimberly Kujat, K-u-j-a-t.
 7 That's an RN employed by Vita Spa.
            Okay. And you just heard her say that the
        Q
 9 patients are sleeping and they're not feeling any
10 pain. Is that correct?
11
            That's correct.
        Α
12
        Q
            I'll play that again.
13
            (Video played.)
14 BY MR. FRICKE:
            Okay. I'll play you another video. This
15
        Q
16 is Exhibit 38, Video No. 1.
17
            (Video played.)
18 BY MR. FRICKE:
19
            So, Exhibit 38, Video No. 1, Kim, who is
20 that in the video on picture right now?
21
        Α
            That's Tammy Hankins.
        Q
            Is Tammy Hankins with her hands grasping a
23 syringe full of, as she represented, plasma. What
24 kind of procedure is she doing here, Kim?
25
            She's doing what's called a PRP injection.
        Α
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Page 73 1 It is where you withdraw blood from the patient, you 2 spin it in what's called a centrifuge and it 3 separates plasma from red blood cells, and then it's 4 re-injected into the patient's body. It's used for 5 multiple procedures, for Vampire facelift, for hair 6 regrowth, and here she's injecting the buttocks for 7 a fuller look, to plump it up. Kim, what's the date of this video's Q 9 posting on Facebook? 10 October 3rd, 2019. Α Thank you. Did Ms. Hankins pictured in 11 Q 12 this video have a license to practice medicine at 13 this time? She did not have a license to practice 15 medicine at this time. And that facility that she's 16 in right there, that's the prior location of Vita 17 Spa before it moved to the new rainbow facility. 18 can determine that by the floor and the cabinets 19 that are behind her. We conducted the inspection at 20 that other facility. 21 And that facility was not a licensed 0 22 medical facility either, correct? 23 That's correct. 24 It was a cosmetology establishment, 25 correct?

- 1 A Correct.
- 2 Q So, obviously, this is kind of a dumb
- 3 question, but to put a fine point on it, one can
- 4 post a video later in time. I could make a video
- 5 now and post the video later, correct, on Facebook?
- 6 A You can, yes.
- 7 Q But I can't take a video in the present and
- 8 post it in the past, correct?
- 9 A That's correct.
- 10 Q So, one can deduce from this video that Ms.
- 11 Hankins is being -- is captured here on film
- 12 practicing medicine on or before October 3rd,
- 13 2019. Is that correct?
- 14 A That's correct.
- THE HEARING OFFICER: Again, because I'm
- 16 not informed about these things, that's a
- 17 cosmetology center. But how do you establish that's
- 18 a medical procedure and not a cosmetic procedure?
- 19 MR. FRICKE: Well, the definition of the
- 20 practice of medicine is found at NRS 630.027, I
- 21 believe. It's the diagnosis, treatment of human
- 22 patients with those skills.
- I can also direct you to the cosmetology
- 24 statute which specifically prohibits invasive
- 25 procedures and the practice of medicine.

- 1 Cosmetologists are not permitted by law to do that.
- 2 They can't, in fact, use the term "medical" by their
- 3 own statute in their practice. They can't say, I'm
- 4 a medical cosmetologist or a medical physician.
- 5 THE HEARING OFFICER: I'm just trying to
- 6 pin down there's a distinction between what she's
- 7 doing. It's not a cosmetic procedure. I wanted to
- 8 establish for purposes of my ruling that that is a
- 9 medical procedure.
- 10 MR. FRICKE: I'm sorry. Let me clarify
- 11 even further. It may be a cosmetic procedure, but
- 12 it is not a cosmetological procedure. Cosmetology
- 13 is defined under the cosmetology statute as hair --
- 14 doing hair, doing makeup, basically handling the
- 15 follicular and the tissues of the body, only the
- 16 epidermis and higher, and they are specifically
- 17 prohibited from going below the epidermis in any
- 18 way--
- 19 THE HEARING OFFICER: Okay.
- 20 MR. FRICKE: -- performing any kind of
- 21 invasive procedure. That's specifically laid out in
- 22 the cosmetology statute.
- 23 THE HEARING OFFICER: That's the gap I
- 24 needed. Thank you.
- 25 MR. FRICKE: Sure. So, it is a cosmetic

- 1 procedure but not a cosmetological one.
- THE HEARING OFFICER: Thank you.
- 3 BY MR. FRICKE:
- 4 Q Kim, we've checked with the cosmetology
- 5 board. Tammy Hankins is not a cosmetologist either.
- 6 Is that correct?
- 7 A She does not hold an esthetician license or
- 8 a cosmetology license, correct.
- 9 Q In your opinion is Ms. Hankins committing a
- 10 crime on this video?
- 11 A Ms. Hankins is committing a crime by
- 12 practicing medicine without a license in the state
- 13 of Nevada.
- 14 Q Thank you. Now, that was a Facebook video.
- 15 Exhibit 47, what does this show, Kim?
- 16 A This is showing procedures performed at
- 17 Vita Spa as a form of advertisement.
- 18 Q This is Giselle Platfoot's Vita Spa
- 19 Facebook page?
- 20 A That's correct.
- 21 Q So, just in context, skip forward because I
- 22 scrolled for quite a while.
- 23 (Video played.)
- 24 BY MR. FRICKE:
- 25 Q The video I showed you before, Video No. 1,

- 1 Exhibit 38, was found on this Facebook page there,
- 2 also in line chronologically October 3rd, 2019.
- 3 Is that correct?
- 4 A That's correct.
- 5 Q So, what can you deduce from that?
- 6 A That Tammy Hankins was videotaped on or
- 7 before October 3rd, 2019, performing medical
- 8 procedures without a license.
- 9 Q Kim, Patients F, G, H, I, and J all of
- 10 those records you have, those are medical records
- 11 obtained from Vita Spa. Let me just be clear as to
- 12 which ones we're referring to.
- 13 So, Patients A through H, Exhibits 1
- 14 through 8, all of those medical records -- are they
- 15 all similar in that they show evidence of medical
- 16 procedures performed by Tammy Hankins during a
- 17 period where she didn't have a license to practice
- 18 medicine in the state?
- 19 A That's correct.
- 20 Q I want to focus your attention to a
- 21 curiosity in your investigation. Exhibit 13, page
- 22 272, "Daily procedures." What is this document?
- 23 A This is a document that is a list of daily
- 24 procedures that shows procedures performed at Vita
- 25 Spa between January 1st, 2019, and

- 1 December 14th, 2020. It has the patient's date of
- 2 service, which is on the left, patient name, the
- 3 billing code for the procedure that was performed,
- 4 the description of that procedure, the provider is
- 5 Tam, which is referring to Tammy Hankins, and the
- 6 fee charged for that procedure.
- 7 Although the date range is stated
- 8 January 1st, 2019, to December 14th, 2020, the
- 9 procedure list does not start until October 15th,
- 10 2019.
- 11 Q But we already know that Ms. Hankins was
- 12 performing procedures before that time, correct?
- 13 A That's correct.
- 14 Q Or, I'm sorry. You can conclude that.
- 15 But I want to clarify. How did -- and when
- 16 did you receive this daily procedure log?
- 17 A I had sent a subpoena out for additional
- 18 records and this was part of the records received.
- 19 Q So, this would have been your subpoena that
- 20 you sent, which is Exhibit 36. Is that correct?
- 21 A That's correct.
- 22 Q And so you asked for procedures from
- 23 January 1st, 2019, through March 6th, 2020. And
- 24 in that stack of records that you received this was
- 25 kind of stuck in there somewhere.

- 1 A That's correct. I'm unsure as to why
- 2 there's highlights on this page. I did not mark
- 3 this page at all.
- 4 Q So, perhaps this was somebody at Vita Spa
- 5 who got a list, made a list of some kind and then
- 6 sort of accidentally gave us the list?
- 7 A Had the list in the records, correct.
- 8 Q Now, and then you sent a subsequent
- 9 subpoena, which is Exhibit 37, stating a slew of
- 10 patients by name. This was sent by you in December.
- 11 I'm sorry. When was this sent? When did you send
- 12 that last subpoena to Vita Spa?
- 13 A May 7th, 2021.
- 14 Q So, why the -- May 7th, 2021.
- 15 Why the last subpoena?
- 16 A Once I received that list of patient names
- 17 and procedures that had been done by Tammy Hankins,
- 18 I wanted to obtain the medical records for those
- 19 procedures.
- 20 Q So, this record -- and I'll just skip
- 21 forward because I know we're -- unless you want to--
- THE HEARING OFFICER: I don't want you to
- 23 feel rushed.
- 24 BY MR. FRICKE:
- Q Well, do the dates -- do the names of the

- 1 patients in Patients A through L, do their names
- 2 appear on this daily procedure log?
- 3 A There's a couple of them that do appear but
- 4 the earlier ones specifically are October 8th,
- 5 9th, 10th time frame. Their names are not
- 6 listed on this.
- 7 Q Because those are the records that you got
- 8 from Dr. Borromeo, correct?
- 9 A Correct.
- 10 Q Sure. So, does this daily procedure log
- 11 show procedures performed at least through
- 12 October 15th, 2019, through at the latest
- 13 October 20th, 2020?
- 14 A The latest August 2020.
- 15 Q August 20th, 2020. \$275,711 in total
- 16 fees charged. Is that correct?
- 17 A Correct.
- 18 Q So, if we direct your attention to page
- 19 273, this is a log, the date cutting off at
- 20 November 22nd, 2019. So, this is further evidence
- 21 that at least all patients 11/22/2019 and prior were
- 22 patients treated by Ms. Hankins when she didn't have
- 23 a license, correct?
- 24 A Correct.
- 25 Q Directing your attention to page 274 and

- 1 referencing this with the supervising agreement,
- 2 which is Exhibit 29, June 8th, 2020, would have
- 3 been the earliest date that Ms. Hankins would be
- 4 permitted to practice medicine even with a license
- 5 because she didn't have a supervising physician
- 6 before that date.
- 7 Therefore, any procedures performed before
- 8 6/8/2020, that would be starting with this patient
- 9 starting with a Z last name on June 6th, all of
- 10 the patients before that would be evidence of her
- 11 practicing medicine without a supervising physician,
- 12 correct?
- 13 A That's correct.
- 14 Q Just so we're clear regarding a couple of
- 15 the final allegations, can we look at Exhibit 9,
- 16 please, the records for Patient I. This begins with
- 17 PMP on page 178.
- 18 So, just to clarify how the PMP works, is
- 19 it your understanding that the PMP is a record that
- 20 is kept by the Nevada Board of Pharmacy, that it's
- 21 information reported to it or to its system by the
- 22 pharmacies that do the dispensing of the
- 23 medications? Is that correct?
- 24 A That's correct.
- Q Okay. And so on page 178, what does this

1 show?

- 2 A This shows the dispensing of alprazolam and
- 3 oxycodone, acetaminophen to Patient EB. The
- 4 prescriber was Salvador. The prescription, the
- 5 alprazolam was written on June 1st, 2020,
- 6 oxycodone written on June 1st, 2020, both of them
- 7 sold on June 1st, 2020. The pharmacy was Santa
- 8 Maria Pharmacy.
- 9 Q This would be the same Santa Maria Pharmacy
- 10 referenced in Dr. Borromeo's response to the
- 11 allegation letter from the pharmacy board wherein he
- 12 says that he wrote these prescriptions for invasive
- 13 cosmetic procedures to be performed by staff at Vita
- 14 Spa. Is that correct?
- 15 A That's correct. And if I may take it one
- 16 step further. On page 174 the patient's name and
- 17 address is listed on that prescription, meaning that
- 18 3225 South Rainbow Boulevard is actually the Vita
- 19 Spa address.
- 20 0 What does that indicate?
- 21 A That indicates that the pharmacy delivered
- 22 the prescription to Vita Spa.
- 23 Q And then on page 185 we get into patient
- 24 records. Are these patient records that you
- 25 obtained from Vita Spa pursuant to your subpoena?

- 1 A Yes.
- Q And we see a different type of form, but
- 3 this contains similar information that was in the
- 4 operative report and prescription information for
- 5 Patient A, correct?
- 6 A Yes, correct.
- 7 Q And so it says to the top left,
- 8 "Alprazolam, 1 milligram" with "Xanax script" --
- 9 scratched out. "Percocet" scratched out.
- 10 "Oxycodone, acetaminophen," the trade name of that
- 11 is Percocet, Kim?
- 12 A Yes, correct.
- 13 Q It says at the bottom, "Procedure,
- 14 liposuction with grafting to breasts." It describes
- 15 the procedure a little bit more.
- 16 Would that be a procedure -- we didn't see
- 17 fat grafting in the video, but would this be that
- 18 kind of procedure that we saw in Video No. 10,
- 19 Exhibit 47. Was it that kind of procedure?
- 20 A That's correct. The only difference with
- 21 this one is, once they removed the fat, they will
- 22 take the fat and transfer it back into another area.
- 23 In this case it would have been the breast.
- 24 Q That plasma fat grafting, that could be as
- 25 shown in the video of Ms. Hankins doing that

- 1 injection. Is that correct?
- 2 A That's correct.
- 3 Q That's fat grafting or plasma injection,
- 4 correct?
- 5 THE HEARING OFFICER: That was Exhibit 38.
- 6 MR. FRICKE: Yes, Exhibit 38, Video No. 1.
- 7 BY MR. FRICKE:
- 8 Q Because it says in here on page 185,
- 9 "Abdomen, upper and lower, 3.2 liters, aspirating
- 10 2000 cc's fat, 1400 cc's."
- 11 So, "tumescent." What does that mean here,
- 12 tumescent?
- 13 A Tumescent is where they typically will
- 14 inject epi-lidocaine to numb the region where they
- 15 will perform the procedure.
- 16 Q So we're clear, you have Dr. Borromeo
- 17 stating that the prescriptions that he signed for
- 18 Ms. Hankins are for the purposes of procedural
- 19 sedation. You have alprazolam and oxycodone,
- 20 acetaminophen, Percocet being prescribed, delivered
- 21 directly from Santa Maria Pharmacy to Vita Spa being
- 22 administered onsite by Ms. Hankins.
- What I'm saying here, does this comport
- 24 with your understanding of what the records show
- 25 you?

- 1 A Yes. In fact, you can even see that
- 2 there's a time of medication given. It looks like
- 3 it's 2:27 a.m. and then again at 9:48.
- 4 Q Where is that? On page 185?
- 5 A That's correct. So, it's right underneath
- 6 the list of medications, time of medications given.
- 7 Q So, let's -- they're writing prescriptions
- 8 for patient-specific medication. Is that correct?
- 9 A Correct.
- 10 Q They're having the pharmacy deliver it
- 11 directly to Vita Spa. Is that correct?
- 12 A Correct.
- 13 Q They're administering it, even recording
- 14 the time they're administering it. Is that correct?
- 15 A Correct.
- 16 Q And in your experience as an investigator
- 17 and as a surgical technician performing an abdominal
- 18 liposuction, is that a procedure that could be
- 19 performed without sedation?
- 20 A In my professional opinion, no.
- 21 Q We have additional records showing
- 22 additional procedures with respect to Patients J as
- 23 well as -- all showing similar procedures.
- 24 Do we have in here evidence records of
- 25 Botox and dermal filler injections Kim?

- 1 A Correct.
- 2 Q And why is it a problem that Ms. Hankins
- 3 was injecting Botox and dermal fillers without a
- 4 license and without a supervising physician?
- 5 A Botox and fillers are dangerous drugs and
- 6 she should not be in possession of dangerous drugs
- 7 without a license.
- 8 O In addition, is it a crime for an
- 9 unlicensed person to inject Botox and dermal
- 10 fillers?
- 11 A Yes, it is.
- 12 O Who is authorized under Nevada law to
- 13 inject Botox and dermal fillers?
- 14 A An individual with a license to practice
- 15 medicine in the state of Nevada and has a CS
- 16 license.
- 17 Q Okay. So, specifically that would be a
- 18 doctor, a licensed and supervised PA, or an APRN,
- 19 also podiatrists and dentists.
- 20 But is it your understanding that those are
- 21 the people authorized to inject Botox and dermal
- 22 fillers?
- 23 A Correct, as well as osteopathic doctors.
- 24 Q And osteopaths, yes. Sorry.
- 25 So, at this point in your investigation

- 1 we're going back to about December 2020, you have
- 2 the daily procedure log, Exhibit 13, showing
- 3 \$275,000 worth of procedures performed by Ms.
- 4 Hankins.
- 5 Do you have, Kim, records in addition to
- 6 the records that we have -- just we cited here in
- 7 our case?
- 8 A Yes. I have many, many records other than
- 9 what is cited in this case. Because of the fact
- 10 there was additional providers who provided
- 11 procedures and additional records for Tammy Hankins
- 12 for providing procedures?
- 13 Q Roughly speaking, how many patient records
- 14 do you have that demonstrate Ms. Hankins -- similar
- 15 to these -- Ms. Hankins providing medical -- sorry
- 16 -- practicing medicine without a license or a
- 17 supervising physician?
- 18 A Over 30.
- 19 Q And those are just the ones we have records
- 20 for. Is that correct?
- 21 A Correct.
- 22 Q Did we receive a record for every single
- 23 patient on that daily procedure log?
- 24 A No, we did not.
- 25 Q So, upon -- let's just -- you have the

- 1 daily procedure log, you have spoken to Dr. Borromeo
- 2 personally, you have obtained records from Spring
- 3 Valley Hospital showing perforated patient on an
- 4 operation performed by Ms. Hankins, you have
- 5 obtained records directly from the pharmacies,
- 6 you've pulled PMPs directly for each patient. You
- 7 have all of this in your hands in December 2020 and
- 8 all of this evidence, as you already testified, of
- 9 Ms. Hankins' unlicensed practice, malpractice, et
- 10 cetera, what did you do then?
- 11 A This case was very broad, had a lot of
- 12 different scenarios and providers involved in it.
- 13 But specifically with Ms. Hankins I wanted to get
- 14 the charts reviewed by one of our medical reviewers
- 15 to get an opinion on this case.
- 16 Q Okay. Let me direct your attention to
- 17 Exhibit 30, a document dated December 15th, 2020.
- 18 What is this?
- 19 A This is the initial allegation letter and
- 20 order that I sent to Tammy Hankins to the address
- 21 listed at the Board of Medical Examiners.
- Q And this is the 3753 Cherry Tree Boulevard
- 23 address in Arizona, correct?
- 24 A That's correct.
- 25 Q Now, the date is December 15th, 2020.

- 1 Again, this first patient, her initials "LC." Is
- 2 this the patient that was allegedly perforated five
- 3 times with a hernia and went to Spring Valley
- 4 Hospital, et cetera?
- 5 A That's correct.
- 6 Q And is this the patient you're currently
- 7 trying to investigate the treatment of Ms. Hankins
- 8 at this patient?
- 9 A That's correct.
- 10 Q And in this allegation letter on page 355
- 11 you explained in your paragraph 11, "It is further
- 12 alleged that on March 6th, 2020, you appeared
- 13 before the Nevada State Board of Medical Examiners
- 14 for consideration of acceptance for application for
- 15 licensure. The Board granted approval of your
- 16 license effective March 6th. However, you were
- 17 deceptive with the Board as you had been practicing
- 18 medicine without a license in the state as early as
- 19 October 2019 and without a supervising physician,"
- 20 and then some specific patients are referenced
- 21 there.
- Is that your understanding of the evidence
- 23 of what has occurred here with respect to Ms.
- 24 Hankins?
- 25 A That's correct.

- 1 Q Just for the record, didn't you have
- 2 Exhibit 31? Is this a second request that you sent
- 3 on January 29th, 2021?
- 4 A Yes.
- 5 Q And then Exhibit 32, is that a third
- 6 request that you sent on February 22nd, 2021?
- 7 A That's correct. It was sent certified
- 8 mail.
- 9 Q Thank you. And then Exhibit 33, is this an
- 10 email that Donna Andrese received from -- I'm sorry
- 11 -- that was sent to Tammy Hankins at Yahoo.com?
- 12 A That's correct. I asked investigator Donna
- 13 Andrese to send all copies of allegation letters and
- 14 what were previously sent to Ms. Hankins as my email
- 15 was not giving me notification of delivery, so I
- 16 requested that he send it so we could have
- 17 notification and delivery that it was sent to the
- 18 email address that Tammy Hankins provided the Board,
- 19 which was Tammy Hankins at Yahoo.com.
- 20 Q Thank you. Exhibit 34, June 28th, 2021,
- 21 is that a second final request page 372?
- 22 A That's correct. This request was sent via
- 23 FedEx to the same address, 3753 Cherry Tree.
- 24 Q And directing your attention to Exhibit 21,
- 25 this is -- is this the public licensing information

- 1 that's available on our website, Kim --
- 2 A That's correct.
- 3 Q -- for Ms. Hankins? Note the date is
- 4 September 9th, 2021. Is that the date this was
- 5 printed out?
- 6 A Yes, it was.
- 7 Q Has -- did Ms. Hankins renew her license in
- 8 June of 2021?
- 9 A Yes, she did.
- 10 Q And during that renewal she would have
- 11 provided her updated address and contact
- 12 information. Is that correct?
- 13 A That's correct.
- 14 Q Showing her initial license date and her
- 15 address on Cherry Tree Lane. Is that correct?
- 16 A Correct.
- 17 Q Exhibits 22 and 23, that's licensing
- 18 information for Vita Spa. Is that correct?
- 19 A That's correct. Exhibit 22 is from the
- 20 secretary of state website.
- 21 O Showing who the owners of the business are,
- 22 et cetera, and then Exhibit 23 is the Clark County
- 23 business licensing information.
- 24 A That's correct. For Vita Spa LLC.
- 25 Q And what license category is Clark County

- 1 licensing Vita Spa?
- 2 A Cosmetology establishment.
- 3 Q What is its current status as of
- 4 September 9th, 2021?
- 5 A License is suspended.
- 6 Q Is it your understanding -- what is your
- 7 understanding of what's currently occurring with
- 8 respect to Clark County's business license of Vita
- 9 Spa?
- 10 A Clark County business license suspended her
- 11 license. They conducted an investigation and they
- 12 will hold a hearing regarding her license and
- 13 whether or not to reactivate it. They did deny her
- 14 application. She submitted an application to change
- 15 it over to a medical facility.
- 16 Q Okay. Exhibit 20, page 307, are these the
- 17 minutes of the board meeting that occurred on
- 18 March 6th, 2020?
- 19 A Yes, it is.
- 20 Q Were you present at that board meeting?
- 21 A Yes, I was.
- 22 Q Just to clarify, on March 6th, 2020, that
- 23 meeting was held in Reno but it was teleconferenced
- 24 to Las Vegas. Is that correct?
- 25 A That's correct.

Page 93 1 So, you were present in Las Vegas for the 0 2 conversation that occurred between Ms. Hankins and 3 the board members. Is that correct? That's correct. Was this -- were these minutes ratified at 6 a subsequent meeting by the board? I believe they were but for a different Α 8 provider. I'm sorry. So, the board --9 Q Please ask your question again. 10 So, the meeting minutes are produced 11 Q 12 following the meeting and then are reviewed and 13 approved by the board members and then ratified at a 14 subsequent meeting. Is that correct? 15 That's correct. Α And just to the extent that it matters, 16 Q 17 there is the minutes of the conversation between Ms. 18 Hankins and the board found at page 318. Is that correct? 19 2.0 Α Correct. 21 0 You've -- have you reviewed these minutes? 2.2 Α Yes, I have. 23 0 Do these minutes comport with your 24 understanding of the conversation between Ms. 25 Hankins and the board members?

- 1 A Yes.
- 2 Q Specifically in the second paragraph or
- 3 sentence, the doctor stated Ms. Hankins had not
- 4 practiced clinical medicine since 2013 due to legal
- 5 actions which resulted in her incarceration.
- 6 And then Ms. Hankins said she wants to move
- 7 to Las Vegas and has found a job at a medical spa
- 8 there, but it is contingent upon her obtaining a
- 9 license in Nevada.
- 10 Do those minutes comport with the
- 11 conversation of what Ms. Hankins stated to the
- 12 board?
- 13 A Yes.
- 14 O Can you elaborate at all about what she
- 15 said?
- 16 A In essence, Ms. Hankins was stating that
- 17 she was going to be working for the Vita Spa or a
- 18 spa that she had already been offered a position but
- 19 she was waiting to get her medical license approved
- 20 by the Nevada State Board of Medical Examiners.
- 21 And I do know that she had submitted prior
- 22 to this an application or, I should say, an
- 23 agreement for a supervising physician with another
- 24 provider not mentioned. However, that application
- 25 was not accepted by the board because she had not

- 1 received her license at that time.
- Q And that's the doctor that's listed in the
- 3 licensing information contained at Exhibit 28. So,
- 4 Exhibit 28, page 348, is this the internal licensing
- 5 information we have on file for Ms. Hankins?
- 6 A That's correct.
- 7 Q This comes from our system referred to as
- 8 "Open Regulate." Is that correct?
- 9 A Yes.
- 10 Q And the date is 9/13, showing her current
- 11 address, telephone number. Page 349 at the bottom
- 12 there, the email that we have in our system for her,
- 13 is that Tammy Hankins at Yahoo.com?
- 14 A Yes.
- 15 Q That's the same email you used to try to
- 16 communicate the allegation letter to her?
- 17 A Yes, it is.
- 18 Q And then on page 350, that earlier attempt,
- 19 I guess, at having an association, is that with a
- 20 doctor -- we'll just say initial CC that's shown
- 21 there, but it shows the date of the association, the
- 22 date of dissociation the same day.
- What does that indicate to you?
- 24 A That's correct. And I also verified with
- 25 Licensing that they submitted an application with

- 1 the board for a supervisory physician agreement,
- 2 however, it was denied because she didn't have a
- 3 license so, in fact, it was never enacted.
- 4 Q Right. So, that's an accounting entry for
- 5 the fact that there was some sort of an attempt to
- 6 associate with the doctor when she didn't have a
- 7 license.
- 8 A Right.
- 9 Q Above that, the date of association in our
- 10 system shows Dr. Borromeo's June 10th.
- 11 Is that correct?
- 12 A Yes.
- 13 Q And the dissociation November 2nd, 2020.
- 14 That would have been the day we received that notice
- 15 of dissociation which was found in -- I believe it's
- 16 Exhibit 29. Is that correct?
- 17 A That's correct.
- 18 Q Okay. So, to sum up, is there anything
- 19 that we've discussed with regard to Ms. Hankins,
- 20 submit multiple violations of the Medical Practices
- 21 Act, unlicensed practice, criminal unlicensed
- 22 practice, have I missed anything, Kim?
- 23 A I believe that you basically covered all
- 24 concerns of the investigation over this past year
- 25 plus that have transpired between Vita Spa and Ms.

SUMMARY SUSPENSION HEARING - 09/20/2021 Page 97 1 Hankins in her treatment of multiple patients, being 2 unlicensed, and practicing medicine without a 3 supervising physician. One last thing. You did have a followup 5 inspection of Vita Spa with Bureau of Healthcare 6 Quality Compliance, correct? Α Correct. 8 When did you do that onsite inspection? Q June 23rd, 2021. 9 And why did you do it at 10:00 a.m.? 10 0 11 That is when the facility opened. Α 12 0 Okay. And who -- you told us about this 13 interaction before. Was the nurse you met Kimberly 14 Kujat? 15 The nurse I meant was Kristin Mulling. Α No. Was she the nurse that was there prepared 16 0 17 to do the procedure that day? 18 Yes, she was. Α 19 0 Once you informed -- at that time you 20 informed Vita Spa that they weren't a licensed 21 outpatient surgical facility, they weren't supposed

25 A That's correct.

22 to be using propofol or any other form of sedation,

23 the Bureau of Healthcare Quality & Compliance

24 informed them of the same thing, correct?

- 1 Q Did the Bureau of Healthcare Quality &
- 2 Compliance send them a cease and desist letter?
- 3 A Yes, they did.
- 4 Q And let's be clear. You literally saw a
- 5 patient prepped and draped with an operating room
- 6 ready to go with propofol on the mayo trays with
- 7 syringes, with one syringe full and another vial of
- 8 propofol full, one empty, the patient ready to go
- 9 and they were waiting on a practitioner to show up.
- 10 Is that correct?
- 11 A That's correct. That was confirmed by
- 12 Ms. Mulling.
- 13 0 Who is?
- 14 A The RN present.
- 15 Q And you obtained records subsequently of
- 16 that procedure. Is that correct?
- 17 A Yes, I did. I saw the records that morning
- 18 and they were laid out in the procedure room and I
- 19 obtained a copy of the medical records.
- 20 Q What do those records indicate?
- 21 A The patient was sent home at the time that
- 22 we were there. However, the records indicated that
- 23 -- which was confirmed later by the nurse who
- 24 performed the procedure, that the patient was
- 25 actually called back later that night.

- 1 Another nurse came in to help perform that
- 2 project, Ms. Kujat, and that patient was put under
- 3 sedation even after Giselle Platfoot had been
- 4 informed that she cannot do that at Vita Spa. The
- 5 patient returned that evening and the liposuction
- 6 procedure and fat transfer procedure was performed
- 7 by use of propofol for sedation.
- 8 Q At Vita Spa. But we don't believe that Ms.
- 9 Hankins performed that procedure. It was another
- 10 practitioner, correct?
- 11 A Correct.
- 12 THE HEARING OFFICER: Was there not an
- 13 anesthesiologist to address the propofol?
- 14 THE WITNESS: The provider who actually
- 15 performed the procedure is an anesthesiologist, but
- 16 there's not another anesthesiologist present during
- 17 that procedure.
- 18 BY MR. FRICKE:
- 19 Q So, to go back to the video we saw with
- 20 Kimberly Kujat sitting at the head of the patient
- 21 while the abdominal liposuction was going on -- I
- 22 mean, we have several other videos that show this
- 23 practitioner. Who is the practitioner performing
- 24 those abdominal liposuctions?
- 25 A The procedure being performed, abdominal

- 1 liposuction, most of those are Dr. MaryAnn Phillips.
- 2 The RN is either Kimberly Kujat or Kristen Mulling,
- 3 and there's videos also for Tammy Hankins performing
- 4 the procedures.
- 5 THE HEARING OFFICER: Is Dr. Phillips an
- 6 anesthesiologist?
- 7 MR. FRICKE: She is, but notably she's not
- 8 a cosmetic surgeon. But there's public record of
- 9 the proceedings that are being -- to the extent it's
- 10 relevant, her license has been suspended and they've
- 11 conducted a summary suspension hearing on her.
- 12 BY MR. FRICKE:
- 13 Q Why is it relevant that at Vita Spa -- now,
- 14 this would have been the third time that you had
- 15 inspected Vita Spa within a year. Is that correct?
- 16 A That's correct.
- 17 Q And not only you, but investigators from
- 18 pharmacy board but also the Bureau of Healthcare
- 19 Quality & Compliance had all informed -- and you
- 20 personally witnessed -- Vita Spa staff, Giselle
- 21 Platfoot specifically, being told that they were not
- 22 to perform procedures under sedation, that they were
- 23 not supposed to have all of these dangerous drugs
- 24 and controlled substances, et cetera, et cetera, all
- 25 of your testimony. You were personally there on

- 1 three occasions when those communications occurred
- 2 to Ms. Platfoot, correct?
- 3 A That's correct.
- 4 Q And so even after that, you obtained
- 5 medical records that showed that they performed a
- 6 propofol sedation abdominal liposuction procedure
- 7 that night under cover of darkness.
- 9 A That's correct.
- 10 Q Okay. So, in your years of working for the
- 11 medical board, have you ever seen a facility
- 12 operated in this manner with unlicensed
- 13 practitioners and this kind of glaring rebuke of the
- 14 authority of multistate agencies? I know that's a
- 15 loaded question, but how do you feel about it?
- 16 A I have conducted investigations
- 17 specifically with the unlicensed practice of
- 18 medicine of med spas where, once the facility is
- 19 notified, they immediately cease and don't attempt
- 20 to practice medicine incorrectly. They make sure
- 21 they have proper licensure and they have a correct
- 22 medical director onsite.
- 23 Unfortunately, this facility continued to
- 24 disregard the authority, the regulations, statutes
- 25 and the laws and continued to perform medical

- 1 procedures on multiple patients, which I know of at
- 2 least two, or if not more, resulted in bodily
- 3 injury. The one patient who initiated the initial
- 4 complaint was serious bodily injury.
- 5 In my professional opinion this behavior
- 6 from Giselle Platfoot from Vita Spa, the providers
- 7 and Tammy Hankins is extremely concerning. Tammy
- 8 Hankins did not respond to any of my allegation
- 9 letters. Therefore, she impeded upon my
- 10 investigation to obtain her side of the story and to
- 11 understand what happened and what transpired.
- 12 All I can go off of is the evidence I
- 13 obtained during my investigation, which supports the
- 14 evidence that Tammy Hankins was practicing medicine
- 15 without a license and Tammy Hankins was deceptive
- 16 with the board when she presented to get acceptance
- 17 of her licensure. We have violations of the board
- 18 order for failing to respond to the allegations
- 19 despite being informed that the possession of
- 20 controlled substances to Giselle Platfoot on
- 21 multiple occasions, there were still dangerous drugs
- 22 and controlled substances available to unlicensed
- 23 individuals including Ms. Hankins.
- 24 Being a former licensee and a former PA in
- 25 Arizona, it is my understanding that Ms. Hankins

- 1 should know the rules and regulations including the
- 2 pharmacy board laws and statutes. She practiced
- 3 medicine without a supervising physician. She is in
- 4 violation of multiple pharmacy board regulations
- 5 which can be supported by the cease and desist order
- 6 received by the pharmacy board. She performed
- 7 invasive procedures in a facility that was not
- 8 licensed to perform those procedures. That
- 9 facility, Vita Spa, received a cease and desist as
- 10 well.
- 11 My other concern is there are multiple
- 12 patient injuries. The patient that she performed
- 13 the liposuction procedure on which resulted in
- 14 perforation of her bowel five times plus a hernia,
- 15 she left that patient abandoned at the end of that
- 16 procedure. She never followed up with that patient
- 17 and she never followed up with the multiple calls
- 18 from Spring Valley Hospital.
- 19 Therefore, I'm concerned that if Ms.
- 20 Hankins is allowed her license to be provided back
- 21 to her, that she will continue in what I would
- 22 consider devious behavior, and I don't believe that
- 23 she would just turn around and perform medicine in
- 24 the state of Nevada under our proper quidelines and
- 25 restrictions and statutory regulations.

- 1 Q Thank you very much, Kim. Two very minor
- 2 points.
- 3 In your experience as both a surgical
- 4 technician and a board investigator, what equipment
- 5 should a surgical operation like this have that Vita
- 6 Spa lacked upon your multiple times that you were
- 7 there to inspect the facility?
- 8 A The facility did not contain any type of
- 9 crash cart other than the defibrillator. They had
- 10 no intubation tubes. They had no epinephrine. In
- 11 fact, I specifically questioned Kristen Mulling
- 12 about that, as to why there was no crash cart. Her
- 13 response was she had requested a crash cart multiple
- 14 times from Giselle Platfoot and Giselle Platfoot did
- 15 not want to pay for the medications needed.
- 16 O And so with respect to Ms. Hankins'
- 17 procedures, Ms. Hankins was using tablet opioids and
- 18 benzodiazepine to sedate the patients for these
- 19 invasive procedures, but you have no evidence that
- 20 they had the ability to revive the patient or
- 21 intubate the patient if there was an overdose or
- 22 some sort of pharmacological event.
- 24 A That's correct.
- 25 Q I know you're not a physician, but you're a

- 1 surgical tech. Is that dangerous?
- 2 A Yes, I would find it personally dangerous,
- 3 yes.
- 4 Q Have you seen any evidence in your
- 5 investigation of Ms. Hankins that she has any
- 6 training whatsoever in performing invasive cosmetic
- 7 surgeries?
- 8 A No. Ms. Hankins has not provided any
- 9 documents to support any certification or training
- 10 or documentation in cosmetic procedures including
- 11 liposuction procedures. In addition, her
- 12 supervising physician for a time, Dr. Borromeo is a
- 13 cardiologist. As her supervising physician, he
- 14 needs to have some sort of training and
- 15 understanding of liposuction procedures as well.
- 16 Q Right. So, because the law requires it,
- 17 does it not, Kim, that if a physician assistant is
- 18 performing a procedure of any kind, that their
- 19 supervising physician be just as qualified or more
- 20 so to supervise that procedure? Is that correct?
- 21 A That's correct.
- 22 Q And so I think you've covered it all. Just
- 23 one last thing about our process, without going into
- 24 too much detail.
- 25 Can you describe the process of allegation

- 1 letter, response, and med review, IC review that
- 2 occurred.
- 3 A Sure. Once an allegation or complaint is
- 4 filed with the board, the investigator will start
- 5 their investigation and they will submit an
- 6 allegation letter and board order. We are an agent
- 7 of the board. Therefore, we send out board orders
- 8 for records and response or both. We give the
- 9 respondent 30 days to provide the records and
- 10 response. We can grant an extension.
- Once our investigation is complete, we
- 12 forward the case to the medical reviewer to obtain a
- 13 medical opinion on the care and treatment provided
- 14 to the patient. The case is then forwarded to the
- 15 investigative committee who is made up of two
- 16 physicians and one public member who will make a
- 17 final decision on the case, which can be anything
- 18 from a closure to an internal letter of correction,
- 19 or they can request it goes to a peer review to be
- 20 reviewed by a peer review of that same specialty, or
- 21 it can even go out to an evaluator if you want
- 22 somebody to evaluate them for a psychiatric or
- 23 substance abuse.
- 24 Q So, specifically, Ms. Hankins' refusal to
- 25 respond to these allegation letters, has it slowed

1 down your investigation?

- 2 A It did impede my investigation because I
- 3 was not able to get her side of the story or able to
- 4 understand what transpired while she performed these
- 5 procedures.
- 6 Q Okay. And is Ms. Hankins, in your opinion,
- 7 a danger to the public?
- 8 A In my professional opinion Ms. Hankins has
- 9 demonstrated a danger to the public and I'm
- 10 concerned she will continue to be a danger to the
- 11 public specifically if she's granted a license.
- 12 Q One last thing. You've spoken to Tammy
- 13 Hankins personally, haven't you?
- 14 A I spoke to Ms. Hankins once.
- 15 Q When did that conversation occur?
- 16 A That conversation occurred -- I would have
- 17 to say early 2021. I'd have to look at the date
- 18 specifically. Oh, October 27th, 2021 --
- 19 October 27th, 2020, which was the date that we did
- 20 the onsite inspection and we spoke to Dr. Borromeo.
- I left a message with Tammy on that date.
- 22 On November 3rd, 2020, Tammy returned my phone
- 23 call and verified her address with me and she
- 24 verified her email address with me. I did inform
- 25 her that she was under investigation and there were

- 1 concerns and allegations. She was aware of the
- 2 patient to whom I was initially starting my
- 3 investigation on and she also stated that she was
- 4 aware that Dr. Borromeo terminated her supervising
- 5 physician agreement with her and she was instructed
- 6 that she could not perform medicine in the state of
- 7 Nevada unless she had another supervising physician
- 8 agreement in place.
- 9 Q Have you attempted to contact her since?
- 10 A I did attempt to phone her one more time.
- 11 Her voice mail told me the voice mail was full and
- 12 couldn't take a message, and she has not returned
- 13 any of my calls.
- 14 Q The number you contacted her on and you
- 15 received a call back and then on which you called
- 16 her on was the number that's her official number on
- 17 file with the board, correct?
- 18 A That's correct.
- 19 Q Okay.
- 20 MR. FRICKE: Thank you very much, Kim. I
- 21 think I'll rest with that, unless you have any
- 22 questions, ma'am.
- THE HEARING OFFICER: I don't. Thank you.
- 24 Thank you, Ms. Friedman.
- 25 MR. FRICKE: Thank you, Kim.

- 1 Very brief closing. The evidence is
- 2 abundant that Ms. Hankins has fraudulently
- 3 prescribed controlled substances, that she has
- 4 practiced medicine without a license, she's
- 5 practiced medicine without a supervising physician,
- 6 she performed dangerous, invasive cosmetic surgeries
- 7 in a demonstrably unsafe facility without
- 8 accreditation or permits. The cosmetology practice
- 9 established with its own business license was
- 10 suspended.
- 11 All of this corroborates our charges that
- 12 there are serious problems with the practice of
- 13 medicine and Vita Spa, that Ms. Hankins has
- 14 practiced medicine without the necessary knowledge
- 15 and training and skills to perform invasive
- 16 surgeries skillfully and safely and has injured
- 17 patients in doing it. She's refused cooperation
- 18 with the board's ongoing investigation, including
- 19 the investigation of those seriously harmed by her
- 20 personally, and she lied to the board in an open
- 21 meeting.
- 22 She should not have a license now or in the
- 23 future. When this case will be formally presented
- 24 to you in its entirety in a month, we'll go into
- 25 greater detail to the extent that's necessary. But

- 1 we met our burden that there's a reasonable basis to
- 2 continue the suspension of Ms. Hankins' license
- 3 pending the conclusion of this hearing and final
- 4 adjudication of the same.
- 5 THE HEARING OFFICER: Thank you.
- 6 So, pursuant to NRS 630.326, if an
- 7 investigation by the board regarding a physician,
- 8 PA, and/or practitioner of respiratory care
- 9 reasonably determines that the health, safety, or
- 10 welfare of the public or any patient served by the
- 11 licensee is at risk of imminent or continued harm,
- 12 the board may summarily suspend the license of the
- 13 licensee pending the conclusion of a hearing to
- 14 consider a formal complaint against the licensee.
- 15 The order of summary suspension may be issued only
- 16 by the board or an investigative committee of the
- 17 board.
- 18 That step has been undertaken and Ms.
- 19 Hankins' license has been suspended. We are here
- 20 today on the basis of a hearing that Ms. Hankins is
- 21 entitled to have no later than 60 days after the
- 22 date on which the order is issued, unless the board
- 23 and the license mutually agree to a longer period to
- 24 determine whether a reasonable basis exists to
- 25 continue the suspension of the license pending the

- 1 conclusion of the hearing to consider a formal
- 2 complaint against the licensee.
- 3 As placed on the record earlier, the formal
- 4 hearing in this matter is October 19th, 2021, at
- 5 8:30. I do find that there's a reasonable basis
- 6 that exists to continue the suspension of Ms.
- 7 Hankins' license pending that date. The basis for
- 8 that includes but is not limited to her prior
- 9 criminal conduct which demonstrates her knowing
- 10 violation of the obligations as a licensee to which
- 11 she should know she's bound and which she has been
- 12 known to have violated previously indicating her
- 13 willful continued violation thereof.
- 14 She practiced extensively without a
- 15 license. She did so unsupervised and in an
- 16 environment where none of the procedures required
- 17 for the safety and care of patients were routinely
- 18 followed by multiple people, including but not
- 19 limited to herself. She practiced without
- 20 appropriate patient care, putting patients at risk
- 21 and danger. She actually caused substantial bodily
- 22 harm for one particular patient. She has
- 23 misrepresented her actions blatantly to the board.
- 24 She has hindered investigations and she's had no
- 25 contact with the board. And while the board is

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 1 aware of her prior conduct, her actual whereabouts,
 2 other than knowing her address and contact
 3 information, are unknown.
            For those reasons and the others stated by
 5 Mr. Fricke on the record, I find that there's
 6 reasonable basis and will continue the suspension.
 7 That concludes the hearing for today.
 8
            (End of proceedings at 11:50 a.m.)
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 1 STATE OF NEVADA
                            )
 2
                            )
                                 SS.
 3 COUNTY OF WASHOE
        I, CHRISTINA MARIE AMUNDSON, a Certified Court
 6 Reporter in and for the states of Nevada and
 7 California, do hereby certify:
        That I was personally present for the purpose
 9 of acting as Certified Court Reporter in the matter
10 entitled herein;
11
        That said transcript which appears hereinbefore
12 was taken in verbatim stenotype notes by me and
13 thereafter transcribed into typewriting as herein
14 appears to the best of my knowledge, skill, and
15 ability and is a true record thereof.
16
17 DATED: At Reno, Nevada, this 8th day of October
18 2021.
19
2.0
                /S/ Christina Amundson
21
             Christina Marie Amundson, CCR #641
2.2
                           -000-
23
24
25
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(775) 688-2559

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and Complaint

| Against:

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TAMMY LYNN HANKINS, PA-C,

Respondent.

Case No. 21-51633-1

FILED

OCT 2 1 2021

NEVADA STATE BOARD OF MEDICAL EXAMINERS

PROOF OF SERVICE

I, Mercedes Fuentes, Legal Assistant for the Nevada State Board of Medical Examiners, hereby certify that on the 29th day of September, 2021, I sent a filed-stamped copy of the **ORDER CONTINUING SUMMARY SUSPENSION** to Tammy Lynn Hankins, PA-C, at 3753 Cherry Tree Blvd., Lake Havasu City, Arizona 86406 via U.S. Certified Mail, tracking no. 9171969009350252157047, delivered on October 4, 2021. *See* **Exhibit 1.**

DATED this 21st day of October, 2021.

MERCEDES FUENTES

Legal Assistant

Nevada State Board of Medical Examiners

EXHIBIT 1

EXHIBIT 1

USPS Tracking®

FAQs >

Track Another Package +

Tracking Number: 9171969009350252157047

Remove X

Your item was delivered to an individual at the address at 2:00 pm on October 4, 2021 in LAKE HAVASU CITY, AZ 86406.

OVER IT IS NOT THE PROPERTY OF THE PROPERTY O

October 4, 2021 at 2:00 pm LAKE HAVASU CITY, AZ 86406 reedbac

Get Updates ✓

Text & Email Updates

Tracking History



October 4, 2021, 2:00 pm

Delivered, Left with Individual LAKE HAVASU CITY, AZ 86406

Your item was delivered to an individual at the address at 2:00 pm on October 4, 2021 in LAKE HAVASU CITY, AZ 86406.

October 3, 2021

In Transit to Next Facility

October 1, 2021, 2:12 pm

Departed USPS Regional Facility

LAS VEGAS NV DISTRIBUTION CENTER

September 30, 2021, 10:28 pm
Arrived at USPS Regional Facility
LAS VEGAS NV DISTRIBUTION CENTER

September 29, 2021, 8:56 pm
Arrived at USPS Regional Facility
RENO NV DISTRIBUTION CENTER

September 29, 2021, 7:41 pm Accepted at USPS Origin Facility RENO, NV 89521

Product Information

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See Less ^

Feedbac

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and Complaint

Against:

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TAMMY LYNN HANKINS, PA-C,

Respondent.

Case No. 21-51633-1

FILED

NOV - 8 2021

NEVADA STATE BOARD OF MEDICAL EXAMINERS

PROOF OF SERVICE

I, Mercedes Fuentes, Legal Assistant for the Nevada State Board of Medical Examiners, hereby certify that on the 1st day of November, 2021, I sent a filed-stamped copy of the **HEARING TRANSCRIPT** to Tammy Lynn Hankins, PA-C, at 3753 Cherry Tree Blvd., Lake Havasu City, Arizona 86406 via U.S. Certified Mail, tracking no. 9171969009350252157849, delivered on November 4, 2021. *See* **Exhibit 1.**

DATED this day of November, 2021.

MERCEDES FUENTES

Legal Assistant

Nevada State Board of Medical Examiners

EXHIBIT 1

EXHIBIT 1



November 5, 2021

Dear Mercedes Fuentes:

The following is in response to your request for proof of delivery on your item with the tracking number: 9171 9690 0935 0252 1578 49.

Item Details

Status:

Delivered, Left with Individual

Status Date / Time:

November 4, 2021, 1:11 pm

Location:

LAKE HAVASU CITY, AZ 86406

Postal Product:

First-Class Mail®

Extra Services:

Certified Mail™

Return Receipt Electronic

Recipient Signature

Signature of Recipient:

or / Vt ~

Address of Recipient:

Note: Scanned image may reflect a different destination address due to Intended Recipient's delivery instructions on file.

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely, United States Postal Service® 475 L'Enfant Plaza SW Washington, D.C. 20260-0004

USPS Tracking[®]

FAQs >

Track Another Package +

Tracking Number: 9171969009350252157849

Remove X

Your item was delivered to an individual at the address at 1:11 pm on November 4, 2021 in LAKE HAVASU CITY, AZ 86406.

Solution Delivered, Left with Individual

November 4, 2021 at 1:11 pm LAKE HAVASU CITY, AZ 86406 Feedback

Get Updates ✓

Text & Email Updates	~
Return Receipt Electronic	~

Tracking History

November 4, 2021, 1:11 pm Delivered, Left with Individual

LAKE HAVASU CITY, AZ 86406

Your item was delivered to an individual at the address at 1:11 pm on November 4, 2021 in LAKE HAVASU CITY, AZ 86406.

November 3, 2021, 9:10 pm

Departed USPS Regional Facility

LAS VEGAS NV DISTRIBUTION CENTER

November 3, 2021, 12:34 am

Arrived at USPS Regional Facility

LAS VEGAS NV DISTRIBUTION CENTER

November 2, 2021 In Transit to Next Facility

November 1, 2021, 9:31 pm

Arrived at USPS Regional Facility
RENO NV DISTRIBUTION CENTER

November 1, 2021, 8:16 pm Accepted at USPS Origin Facility RENO, NV 89521

Product Information



See Less ^

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and Complaint

Against:

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TAMMY LYNN HANKINS, PA-C,

Respondent.

Case No. 21-51633-1

FILED

NOV 1 0 2021

NEVADA STATE BOARD OF MEDICAL EXAMINERS By:

PROOF OF SERVICE

I, Mercedes Fuentes, Legal Assistant for the Nevada State Board of Medical Examiners, hereby certify that on the 13th day of September, 2021, I sent a filed-stamped copy of the **SCHEDULING ORDER** to Tammy Lynn Hankins, PA-C, at 3753 Cherry Tree Blvd., Lake Havasu City, Arizona 86406 via Fed Ex Priority, tracking no. 774782542489, delivered on September 14, 2021. *See* Exhibit 1.

DATED this 10th day of November, 2021.

MERCEDES FUENTES

Legal Assistant

Nevada State Board of Medical Examiners

EXHIBIT 1

EXHIBIT 1



TRACK ANOTHER SHIPMENT

7747 8254 2489



ADD NICKNAME

Delivered Tuesday, 9/14/2021 at 11:58 am



DELIVERED

Signature not required

GET STATUS UPDATES

OBTAIN PROOF OF DELIVERY

FROM

Reno, NV US

TO

LAKE HAVASU CITY, AZ US

MANAGE DELIVERY

Travel History

TIME ZONE Local Scan Time

Tuesday, September 14, 2021

11:58 AM

LAKE HAVASU CITY, AZ

Delivered

Package delivered to recipient address - release authorized

10:41 AM

LAKE HAVASU CITY, AZ

On FedEx vehicle for delivery

LAKE HAVASU CITY, AZ

At local FedEx facility

10:24 AM

4:14 AM

PHOENIX, AZ

At destination sort facility

2:47 AM

OAKLAND, CA

Departed FedEx hub

Monday, September 13, 2021

10:01 PM

RENO, NV

Left FedEx origin facility

9:50 PM

OAKLAND, CA

Arrived at FedEx hub

7:27 PM

RENO, NV

Left FedEx origin facility

11/10/21, 11:03 AM

Detailed Tracking

4:01 PM

RENO, NV

Picked up

11:57 AM

Shipment information sent to FedEx

Expand History 🗸

Shipment Facts

TRACKING NUMBER

7747 8254 2489

DELIVERED TO

Residence

TERMSShipper

SHIP DATE 9/13/21 ②

SERVICE

FedEx Priority Overnight

TOTAL PIECES

1

PACKAGING

FedEx Envelope

STANDARD TRANSIT

9/14/21 before 12:00 pm ?

WEIGHT

 $0.5 \, lbs \, / \, 0.23 \, kgs$

TOTAL SHIPMENT WEIGHT

0.5 lbs / 0.23 kgs

SPECIAL HANDLING SECTION

Deliver Weekday, Residential Delivery

ACTUAL DELIVERY

9/14/21 at 11:58 am