BEFORE THE COLORADO MEDICAL BOARD

STATE OF COLORADO

CASE NOS. 2024-7879-B & 2024-7880-B

#### STIPULATION AND FINAL AGENCY ORDER

IN THE MATTER OF THE DISCIPLINARY PROCEEDING REGARDING THE LICENSE TO PRACTICE MEDICINE IN THE STATE OF COLORADO OF NEELIMA PRADHAN, M.D., LICENSE NUMBER DR-34754,

Respondent.

IT IS HEREBY STIPULATED and agreed by and between Inquiry Panel B ("Panel") of the Colorado Medical Board ("Board") and Neelima Pradhan, M.D. ("Respondent") (collectively, the "Parties") as follows:

## **JURISDICTION AND CASE HISTORY**

- 1. Respondent was licensed to practice medicine in the state of Colorado on August 17, 1995, and was issued license number DR-34754 ("License"), which Respondent has held continuously since that date.
- 2. The Panel and the Board have jurisdiction over Respondent and over the subject matter of this proceeding.
- 3. On January 16, 2025, the Panel reviewed case numbers 2024-7879-B and 2024-7880-B and determined that further proceedings by formal complaint were warranted pursuant to Section 12-240-125(4)(c)(V), C.R.S. The Parties have agreed to resolution of this matter prior to referral to the Attorney General.
- 4. It is the intent of the Parties and the purpose of this Stipulation and Final Agency Order ("Order") to provide for a settlement of all matters set forth in case numbers 2024-7879-B and 2024-7880-B, without the necessity of conducting a formal disciplinary hearing. This Order constitutes the entire agreement between the Parties, and there are no other agreements or promises, written or oral, which modify, interpret, construe or affect this Order.
  - 5. Respondent understands that:
  - a. Respondent has the right to be represented by an attorney of the Respondent's choice, and Respondent has voluntarily chosen to proceed without representation;

- b. Respondent has the right to a formal complaint and disciplinary hearing pursuant to Sections 12-240-125(4)(c)(V) and 12-240-125(5), C.R.S.;
- c. By entering into this Order, Respondent is knowingly and voluntarily giving up the right to a formal complaint and disciplinary hearing, admits the facts contained in this Order, and relieves the Panel of its burden of proving such facts;
- d. Respondent is knowingly and voluntarily giving up the right to present a defense by oral and documentary evidence and to cross-examine witnesses who would testify on behalf of the Panel; and
- e. Respondent is knowingly and voluntarily waiving the right to seek judicial review of this Order.

### **FACTUAL BASIS**

- 6. The Respondent acknowledges and the Panel finds that, if the Panel were to prove the following facts at hearing, it would constitute a prima facie case of unprofessional conduct as defined in the Medical Practice Act and would subject Respondent to discipline. Respondent denies the following allegations:
  - a. On or about November 15, 2024, the Board issued an Order pursuant to section 12-240-124(8)(a), C.R.S. ("Order"), requiring Respondent to submit to a mental or physical examination by the Colorado Physician Health Program ("CPHP").
  - b. Respondent was required to contact CPHP by November 22, 2024, and to attend the CPHP intake appointment by December 27, 2024.
  - c. Respondent contacted CPHP on November 18, 2024 but has not completed her new referral call or scheduled her intake appointment as required by the Order despite outreach attempts from CPHP. Respondent remains non-compliant with the Board's Order to complete an examination and cooperate fully with CPHP. As a result, Respondent violated the Board's November 15, 2024 Order.
- 7. Respondent admits and the Panel finds that the acts and/or omissions described in the factual basis above, if proven, constitute unprofessional conduct pursuant to Section 12-240-121(1)(n), C.R.S., which states:
  - (1) Unprofessional conduct" as used in this article 240 means:
    - (n) Violation of any valid board order or any rule or regulation promulgated by the board in conformance with law.
  - 8. Based upon the above, the parties stipulate that the terms of this Order

are authorized by Section 12-240-125(5)(c)(III), C.R.S.

# PERMANENT RELINQUISHMENT OF LICENSE

- 9. Commencing on the effective date of this Order, Respondent's License in the State of Colorado is permanently relinquished. Respondent understands and acknowledges that she is permanently relinquishing a license to practice medicine in Colorado. Respondent agrees not to apply for reactivation, reinstatement or issuance of a new license to practice medicine in Colorado at any time in the future. Respondent specifically waives any right to which she may be entitled pursuant to Section 12-240-118(5)(e), C.R.S. regarding application for licensure.
- 10. Following relinquishment of Respondent's license, Respondent shall perform no act requiring a license issued by the Board, nor shall Respondent perform any act in any other location pursuant to the authority of a license to practice medicine granted by the state of Colorado.

### **OTHER TERMS**

- 11. The terms of this Order were mutually negotiated and determined.
- 12. Both Parties acknowledge that they understand the legal consequences of this Order; both Parties enter into this Order voluntarily; and both Parties agree that no term or condition of this Order is unconscionable.
- 13. All costs and expenses incurred by Respondent to comply with this Order shall be the sole responsibility of Respondent and shall in no way be the obligation of the Board or Panel.
- 14. If Respondent is licensed by any other jurisdiction, Respondent shall report this Order to all other jurisdictions in which Respondent is licensed.
- 15. So that the Board may notify hospitals of this agreement pursuant to section 12-240-125(11), C.R.S., Respondent presently holds privileges at or is employed by the following hospitals and facilities:

16. This Order and all its terms shall have the same force and effect as an order entered after a formal disciplinary hearing pursuant to section 12-240-125(5)(c)(III), C.R.S., except that it may not be appealed. Failure to comply with the terms of this Order may be sanctioned by the Inquiry Panel as set forth in section 12-240-125(5)(c)(IV), C.R.S. This Order and all its terms also constitute a valid board order for purposes of section 12-240-125(1)(n), C.R.S.

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