

**STATE OF FLORIDA
DEPARTMENT OF HEALTH**

DEPARTMENT OF HEALTH,

PETITIONER,

v.

CASE NUMBER 2022-18380

GLADYS GREGORY, M.D.,

RESPONDENT.

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ADMINISTRATIVE COMPLAINT

Petitioner Department of Health hereby files this Administrative Complaint before the Board of Medicine against Respondent Gladys Gregory, M.D., and alleges:

1. Petitioner is the state agency charged with regulating the practice of medicine pursuant to section 20.43, Florida Statutes; chapter 456, Florida Statutes; and chapter 458, Florida Statutes.

2. At all times material to this Complaint, Respondent was a licensed physician within the state of Florida, having been issued license number ME 62962.

3. Respondent's address of record is 1207 Churchill Road, Gallatin, Tennessee 37066.

4. At all times material to this Complaint, Respondent was a licensed physician within the state of Kentucky, having been issued license number 48713.

5. The Kentucky Board of Medical Licensure (Kentucky Board) is the licensing authority regulating the practice of medicine in the state of Kentucky.

6. On or about April 21, 2022, the Kentucky Board issued its Order of Indefinite Restriction suspending Respondent until Respondent is evaluated through the Vanderbilt Comprehensive Assessment Program for Professionals; pays a \$500 fine; completes a Medical Ethics course; and reimburses the Kentucky Board for costs for Respondent's discipline by the Tennessee Board of Medical Examiners.

7. The Kentucky Board's action stemmed from allegations involving Respondent's discipline by the Tennessee Board of Medical Examiners for offering patients discounts in exchange for the recruitment of other patients.

8. Respondent failed to report the Kentucky discipline to Board of Medicine, in writing, within thirty (30) days.

COUNT I

9. Petitioner re-alleges and incorporates by reference paragraphs one (1) through eight (8), as if fully set forth herein.

10. Section 458.331(1)(b), Florida Statutes (2021), subjects a licensee to discipline for having a license or the authority to practice medicine revoked, suspended, or otherwise acted against, including denial of licensure, by the licensing authority of any jurisdiction, including its agencies or subdivisions.

11. The Kentucky Board acted against Respondent's Kentucky physician license through its Stipulation and Order on April 21, 2022.

12. Based on the foregoing, Respondent violated section 458.331(1)(b), Florida Statutes (2021), by having his physician license acted against by the licensing authority of Kentucky.

COUNT II

13. Petitioner re-alleges and incorporates by reference paragraphs one (1) through eight (8), as if fully set forth herein.

14. Section 458.331(1)(kk), Florida Statutes (2021), subjects a licensee to discipline for failing to report to the Board, in writing, within thirty (30) days.

15. Respondent failed to report the Kentucky discipline to the Board of Medicine, in writing, within thirty (30) days of April 21, 2022.

16. Based on the foregoing, Respondent violated section 458.331(1)(kk), Florida Statutes (2021).

WHEREFORE, Petitioner respectfully requests that the Board of Medicine enter an order imposing one or more of the following penalties: permanent revocation or suspension of Respondent's license, restriction of practice, imposition of an administrative fine, issuance of a reprimand, placement of Respondent on probation, corrective action, refund of fees billed or collected, remedial education and/or any other relief that the Board deems appropriate.

SIGNED this 17th day of April, 2023.

/s/ Jonathan Golden

Jonathan Golden
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FILED
DEPARTMENT OF HEALTH
DEPUTY CLERK

CLERK: Elizabeth Eubanks

DATE: April 17, 2023

PCP: April 14, 2023

PCP Members: Magda Averhoff, M.D.; Luz M. Pages, M.D.; Nicole Justice

NOTICE OF RIGHTS

Respondent has the right to request a hearing to be conducted in accordance with Section 120.569 and 120.57, Florida Statutes, to be represented by counsel or other qualified representative, to present evidence and argument, to call and cross-examine witnesses and to have subpoena and subpoena duces tecum issued on his or her behalf if a hearing is requested. A request or petition for an administrative hearing must be in writing and must be received by the Department within 21 days from the day Respondent received the Administrative Complaint, pursuant to Rule 28-106.111(2), Florida Administrative Code. If Respondent fails to request a hearing within 21 days of receipt of this Administrative Complaint, Respondent waives the right to request a hearing on the facts alleged in this Administrative Complaint pursuant to Rule 28-106.111(4), Florida Administrative Code. Any request for an administrative proceeding to challenge or contest the material facts or charges contained in the Administrative Complaint must conform to Rule 28-106.2015(5), Florida Administrative Code.

Please be advised that mediation under Section 120.573, Florida Statutes, is not available for administrative disputes involving this agency action.

NOTICE REGARDING ASSESSMENT OF COSTS

Respondent is placed on notice that Petitioner has incurred costs related to the investigation and prosecution of this matter. Pursuant to Section 456.072(4), Florida Statutes, the Board shall assess costs related to the investigation and prosecution of a disciplinary matter, which may include attorney hours and costs, on the Respondent in addition any other discipline imposed.