

**STATE OF FLORIDA
DEPARTMENT OF HEALTH**

DEPARTMENT OF HEALTH,

PETITIONER,

v.

CASE NO. 2023-17946

RICHARD ALAN HILL, M.D.,

RESPONDENT.

_____ /

ADMINISTRATIVE COMPLAINT

Petitioner, Department of Health, by and through its undersigned counsel, hereby files this Administrative Complaint before the Board of Medicine against Respondent, Richard Alan Hill, M.D., and in support thereof 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 the license number of ME144397.

3. Respondent's address of record is 2117 Smith Ave., Suite B, Chesapeake, VA 23320.

4. Respondent is also licensed to practice medicine in the state of Virginia by the Virginia Board of Medicine (hereinafter "Virginia State Board"), the licensing authority charged with regulating the practice of medicine in Virginia.

5. On or about May 22, 2024, the Virginia State Board issued an Order ("Order") disciplining Respondent's Virginia medical license.

6. The Order stemmed from allegations that Respondent inappropriately prescribed controlled substances, failed to keep adequate medical records, and by having their DEA registration suspended.

7. The May 22, 2024, Order issued by the Virginia State Board constitutes action against Respondent's Virginia medical license.

8. Section 458.331(1)(b), Florida Statutes (2023), sets forth grounds for disciplinary action by the Board of Medicine and provides that having a license or the authority to practice medicine revoked, suspended, or otherwise acted against, including the denial of licensure, by the licensing authority of another jurisdiction constitutes grounds for discipline.

9. The Virginia State Board acted against Respondent's license by issuing the Order disciplining their Virginia medical license on or about May 22, 2024.

10. Based on the foregoing, Respondent has violated section 458.331(1)(b), Florida Statutes (2023).

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 11th day of April, 2025.

Joseph A. Ladapo, MD, PhD
State Surgeon General

Richard S Wagner

Richard Schyler Wagner
Assistant General Counsel
Prosecution Services Unit
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FILED
DEPARTMENT OF HEALTH
DEPUTY CLERK
CLERK *Amy Carraway*
DATE **APR 14 2025**

PCP Date: April 11, 2025

PCP Members: Zachariah Zachariah, M.D., Wael Barsoum, 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.