STATE OF FLORIDA DEPARTMENT OF HEALTH

DEPARTMENT OF HEALTH, PETITIONER,

PETITIONER,	
V.	CASE NUMBER: 2024-26244
VENKATESWARA TALASILA, M.D.	
RESPONDENT.	

ADMINISTRATIVE COMPLAINT

Petitioner, Department of Health, by and through its undersigned counsel, files this Administrative Complaint before the Board of Medicine against Respondent, Venkateswara Talasila, M.D., and alleges:

- 1. Petitioner is the state department 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 ME144427.

- 3. Respondent's address of record is 25 Sawmill Creek Trail, Saginaw, Michigan 48603.
- 4. On or about May 15, 2024, the Michigan Board of Medicine acted against Respondent's license to practice medicine in Michigan via Consent Order.
- 5. The Michigan Consent Order included findings that Respondent violated a general duty consisting of negligence or failure to exercise due care.
- 6. The Michigan Consent Order also found that Respondent failed to conform to minimal standards of acceptance and prevailing practice for a health profession.
- 7. The Michigan Consent Order stemmed from allegations that Respondent prescribed lithium carbonate in 2020 and 2021 without obtaining serum Lithium level results.
 - 8. The Michigan Consent order issued a \$500.00 fine.
- 9. The Michigan Board of Medicine is the licensing authority for the practice of medicine in Michigan.
- 10. Section 458.331(1)(b), Florida Statutes (2023), 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 any jurisdiction, including its agencies and subdivisions, is grounds for discipline.

- 11. On or about May 15, 2024, the Michigan Board of Medicine acted against Respondent's Michigan license by entering the Michigan Consent Order.
- 12. Based on the foregoing, Respondent has violated Section 458.331(1)(b), Florida Statutes (2023), by having his license to practice medicine in the state of Michigan acted against.

WHEREFORE, the 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 the Respondent on probation, corrective action, refund of fees billed or collected, remedial education and/or any other relief that the Board deems appropriate.

[signature on following page]

SIGNED this 15th day of November, 2024.

Joseph A. Ladapo, MD, PhD State Surgeon General

Justin R. Ravelo

Florida Bar No.: 1022417 Assistant General Counsel **DOH Prosecution Services Unit** 4052 Bald Cypress Way, Bin C-65 Tallahassee, FL 32399-3265 Telephone (850) 558-9840 Fax (850) 245-4684

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DEPARTMENT OF HEALTH

CLERK DATE

PCP Date: November 8, 2024

PCP Members: Rosenberg, M.D.; Coffman, M.D.; Romanello

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 Code.

Mediation under Section 120.573, Florida Statutes, is not available to resolve this Administrative Complaint.

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 to any other discipline imposed.