

BEFORE THE MEDICAL LICENSING BOARD OF INDIANA
CAUSE NO. 2012 MLB 0021

IN THE MATTER OF THE LICENSE OF
TERESITA CHAVEZ RAMILO, M.D.
LICENSE NO: 01034652 (ACTIVE)

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)
)



COMPLAINT

This complaint is brought against the medical license of Teresita Chavez Ramilo, M.D., by the State of Indiana, by counsel, Deputy Attorney General, Jason J. Gross, on behalf of the Office of the Attorney General (Petitioner) and pursuant to Indiana Code § 25-1-7-7, Ind. Code §25-1-5-3, Ind. Code §25-22.5 *et seq.*, the Administrative Orders and Procedures Act, Ind. Code § 4-21.5-3 *et seq.* and Ind. Code § 25-1-9-1 *et seq.*, and in support alleges and states:

FACTS

1. Respondent's address on file with the Indiana Medical Licensing Board is 610 East Southport Road, Suite 200, Indianapolis, Indiana 46227. Respondent is a licensed Physician holding Indiana license number 01034652.
2. In 2005, Respondent began treating Patient A for Depression and Adult Attention Deficit Disorder ("ADD") at Universal Behavioral Services ("UBS") in Indianapolis, Indiana.
3. In September of 2005, Respondent left UBS and discontinued her treatment of Patient A, who continued to receive treatment at UBS.
4. On or about May 8, 2007, Respondent began treating Patient A again at St. Francis Psychiatric Associates ("St. Francis") in Indianapolis, Indiana. Respondent

diagnosed Patient A with Depression and Adult ADD. At this visit Respondent prescribed Patient A Alprazolam 2mg, #45 for a thirty (30) day supply. The Drug Enforcement Agency ("DEA") classifies Alprazolam as a Schedule IV Controlled Substance. Respondent also prescribed Focalin RX 20 mg, #30 for a 30 day supply. Focalin is the trade name for Dexmethylphenidate, which the DEA classifies as a Schedule II Controlled Substance.

5. On or about July 9, 2007, Patient A advised Respondent he had gone on a methamphetamine binge, to which Respondent advised him to receive medical treatment at Fairbanks Hospital of Indianapolis, Indiana.

6. From July 28, 2007, through July 22, 2008, Respondent prescribed medication to Patient A on seventeen (17) occasions including:

a. Alprazolam 2mg, #90 for a thirty (30) day supply on July, 28 2007;

b. Vyvanse 30mg, #30 for a thirty (30) day supply on July 31, 2007,

Vyvanse is the trade name for Lisdexamphetamine, which the DEA classifies as a Schedule II Controlled Substance;

c. Alprazolam 2mg, #60 for a thirty (30) day supply on August, 11 2007;

d. Alprazolam 2mg, #60 for a thirty (30) day supply on October 9, 2007;

e. Vyvanse 70mg, #30 for a thirty (30) day supply on October 24, 2007;

f. Desoxyn 5mg, #120 for a thirty (30) day supply on November 30, 2007,

Desoxyn is the trade name for methamphetamine, which the DEA classifies as a Schedule II Controlled Substance;

g. Desoxyn 5mg, #120 for a thirty (30) day supply on January 1, 2008;

h. Desoxyn 5mg, #180 for a thirty (30) day supply on February 6, 2008;

- i. Alprazolam 2mg, #60 for a thirty (30) day supply on February 23, 2008;
- j. Desoxyn 5mg, #180 for a thirty (30) day supply on March 9, 2008;
- k. Alprazolam 2mg, #60 for a thirty (30) day supply on March 22, 2008;
- l. Alprazolam 2mg, #60 for a thirty (30) day supply on April 18, 2008;
- m. Desoxyn 5mg, #180 for a thirty (30) day supply on May 7, 2008;
- n. Alprazolam 2mg, #14 for a seven (7) day supply on May 23, 2008;
- o. Alprazolam 2mg, #60 for a thirty (30) day supply on June 2, 2008;
- p. Desoxyn 5mg, #180 for a thirty (30) day supply on June 8, 2008; and
- q. Desoxyn 5mg, #120 for a thirty (30) day supply on July 22, 2008.

7. There is no indication in Patient A's medical record that Respondent performed any drug screens, ran an INSPECT report, or had Patient A sign any type of substance abuse contract. Further, there is no discussion in Patient A's medical record that Respondent followed up on any treatment received by Patient A from Fairbanks Hospital regarding his methamphetamine binge in July 2007.

COUNT I

- 8. Paragraphs 1-7 are incorporated by reference herein.
- 9. Respondent's conduct as described above constitutes a violation of Indiana Code § 25-1-9-4(a)(9) in that Respondent has knowingly prescribed a substance classified as a narcotic, addicting, or dangerous drug to a known addict or habitué as evidenced by Respondent's prescribing controlled substances to patient A after Respondent was informed that Patient A had undergone a methamphetamine binge in July, 2007.

COUNT II

10. Paragraphs 1-7 are incorporated by reference herein.
11. Respondent's conduct as described above constitutes a violation of Indiana Code § 25-1-9-4(a)(4)(A) in that Respondent has continued to practice although Respondent has become unfit to practice due to professional incompetence in that Respondent failed to take reasonable precautions to identify or address Patient A's addiction.

WHEREFORE, Petitioner demands an order against the Respondent, that:

1. Imposes the appropriate disciplinary sanction;
2. Directs Respondent to immediately pay all the cost incurred in the prosecution of this case;
3. Provides any other relief the Board deems just and proper.

Respectfully submitted,

GREGORY F. ZOELLER
Attorney General of Indiana

By: 


Jason Gross
Deputy Attorney General
Licensing Enforcement and Homeowner
302 West Washington Street, Fifth Floor
Indianapolis, Indiana 46204
Phone (317) 232-6308
Fax (317) 233-4393
Email: Jason.gross@atg.in.gov

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing "Complaint" has been served upon the Respondent listed below, by United States mail, first class postage prepaid, on this ~~7th~~ 16th day of March, 2012.

John Williams
Hall Render
One American Square, Ste. 2000
Indianapolis, Indiana 46282

Teresita Chavez Ramilo, M.D.
610 East Southport Road, Suite 200
Indianapolis, IN 46227



Jason J. Gross
Deputy Attorney General

Office of the Attorney General
Indiana Government Center South, Fifth Floor
302 West Washington Street
Indianapolis, Indiana 46204-2770
(317) 232-6308

**BEFORE THE MEDICAL LICENSING BOARD OF INDIANA
CAUSE NO. 2012 MLB 0021**



IN THE MATTER OF THE LICENSE OF)
)
TERESITA CHAVEZ RAMILO, M.D.)
)
LICENSE NO: 01034652 (ACTIVE))

AMENDED COMPLAINT

This Amended Complaint is brought against the medical license of Teresita Chavez Ramilo, M.D., by the State of Indiana, by counsel, Deputy Attorney General, Jason J. Gross, on behalf of the Office of the Attorney General (Petitioner) and pursuant to Indiana Code § 25-1-7-7, Ind. Code §25-1-5-3, Ind. Code §25-22.5 *et seq.*, the Administrative Orders and Procedures Act, Ind. Code § 4-21.5-3 *et seq.* and Ind. Code § 25-1-9-1 *et seq.*, and in support alleges and states:

FACTS

1. Respondent's address on file with the Indiana Medical Licensing Board is 610 East Southport Road, Suite 200, Indianapolis, Indiana 46227. Respondent is a licensed Physician holding Indiana license number 01034652.
2. In 2005, Respondent began treating Patient A for Depression and Adult Attention Deficit Disorder ("ADD") at Universal Behavioral Services ("UBS") in Indianapolis, Indiana.
3. In September of 2005, Respondent left UBS and discontinued her treatment of Patient A, who continued to receive treatment at UBS.
4. On or about May 7, 2007, Respondent prescribed Patient A Xanax 2mg, #90 for a thirty (30) day supply.

5. On or about May 8, 2007, Respondent began treating Patient A again at St. Francis Psychiatric Associates ("St. Francis") in Indianapolis, Indiana. Respondent diagnosed Patient A with Depression and Adult ADD. At this visit Respondent prescribed Patient A Alprazolam 2mg, #45 for a thirty (30) day supply. The Drug Enforcement Agency ("DEA") classifies Alprazolam as a Schedule IV Controlled Substance. Respondent also prescribed Focalin XR 20 mg, #30 for a 30 day supply. Focalin is the trade name for Dexmethylphenidate, which the DEA classifies as a Schedule II Controlled Substance.

6. On or about June 4, 2007, Respondent prescribed Patient A Alprazolam 2mg, #45 for a thirty (30) day supply.

7. On or about July 9, 2007, Patient A advised Respondent he had gone on a methamphetamine binge, to which Respondent advised him to receive medical treatment at Fairbanks Hospital of Indianapolis, Indiana.

8. From July 28, 2007, through June 2, 2008, Respondent prescribed medication to Patient A on seventeen (17) occasions including:

- a. Alprazolam 2mg, #90 for a thirty (30) day supply on July, 28 2007;
- b. Vyvanse 30mg, #30 for a thirty (30) day supply on July 30, 2007, Vyvanse is the trade name for Lisdexamphetamine, which the DEA classifies as a Schedule II Controlled Substance;
- c. Xanax 2mg, #60 for a thirty (30) day supply on July 30, 2007;
- d. Vyvanse 70mg, #30 for a thirty (30) day supply on October 4, 2007;
- e. Xanax 2mg, #60 for a thirty (30) day supply on October 4, 2007;

- f. Desoxyn 5mg, #120 for a thirty (30) day supply on November 27, 2007, Desoxyn is the trade name for methamphetamine, which the DEA classifies as a Schedule II Controlled Substance;
- g. Desoxyn 5mg, #120 for a thirty (30) day supply on December 12, 2007;
- h. Desoxyn 5mg, #120 for a thirty (30) day supply on January 22, 2008;
- i. Desoxyn 5mg, #180 for a thirty (30) day supply on February 6, 2008;
- j. Xanax 2mg, #60 for a thirty (30) day supply on February 6, 2008;
- k. Alprazolam 2mg, #60 for a thirty (30) day supply on February 23, 2008;
- l. Desoxyn 5mg, #180 for a thirty (30) day supply on March 5, 2008;
- m. Xanax 2mg, #60 for a thirty (30) day supply on March 17, 2008;
- n. Desoxyn 5mg, #180 for a thirty (30) day supply on April 2, 2008;
- o. Suboxone 2mg, #84 for a thirty (30) day supply on April 18, 2008;
- p. Xanax 2mg, #14 for a seven (7) day supply on May 23, 2008; and,
- q. Desoxyn 5mg, #180 for a thirty (30) day supply on June 2, 2008.

7. There is no indication in Patient A's medical record that Respondent performed any drug screens, ran an INSPECT report, or had Patient A sign any type of substance abuse contract. Further, there is no discussion in Patient A's medical record that Respondent followed up on any treatment received by Patient A from Fairbanks Hospital regarding his methamphetamine binge in July 2007.

COUNT I

- 8. Paragraphs 1-7 are incorporated by reference herein.
- 9. Respondent's conduct as described above constitutes a violation of Indiana Code § 25-1-9-4(a)(9) in that Respondent has knowingly prescribed a substance

classified as a narcotic, addicting, or dangerous drug to a known addict or habitué as evidenced by Respondent's prescribing controlled substances to patient A after Respondent was informed that Patient A had undergone a methamphetamine binge in July, 2007.

COUNT II

10. Paragraphs 1-7 are incorporated by reference herein.

11. Respondent's conduct as described above constitutes a violation of Indiana Code § 25-1-9-4(a)(4)(A) in that Respondent has continued to practice although Respondent has become unfit to practice due to professional incompetence in that Respondent failed to take reasonable precautions to identify or address Patient A's addiction.

WHEREFORE, Petitioner demands an order against the Respondent, that:

1. Imposes the appropriate disciplinary sanction;
2. Directs Respondent to immediately pay all the cost incurred in the prosecution of this case; and,
3. Provides any other relief the Board deems just and proper.

Respectfully submitted,

GREGORY F. ZOELLER
Attorney General of Indiana

By: 

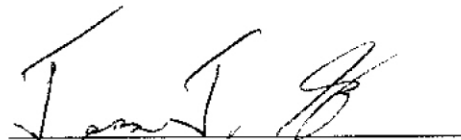
Jason Gross
Deputy Attorney General
Licensing Enforcement and Homeowner
302 West Washington Street, Fifth Floor
Indianapolis, Indiana 46204
Phone (317) 232-6308
Fax (317) 233-4393
Email: Jason.gross@atg.in.gov

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing "Amended Complaint" has been served upon the Respondent listed below, by United States mail, first class postage prepaid, on this 31st day of August, 2012.

John Williams
Hall Render
One American Square, Ste. 2000
Indianapolis, Indiana 46282

Teresita Chavez Ramilo, M.D.
610 East Southport Road, Suite 200
Indianapolis, IN 46227



Jason J. Gross
Deputy Attorney General

Office of the Attorney General
Indiana Government Center South, Fifth Floor
302 West Washington Street
Indianapolis, Indiana 46204-2770
(317) 232-6308

BEFORE THE MEDICAL LICENSING BOARD OF INDIANA
CAUSE NO. 2012 MLB 0021

IN THE MATTER OF THE LICENSE OF)
)
TERESITA CHAVEZ RAMILO, M.D.)
)
LICENSE NO: 01034652A)



**FINAL ORDER ACCEPTING PROPOSED FINDINGS OF FACT, CONCLUSIONS OF
LAW AND ORDER**

The State of Indiana ("Petitioner"), by the Office of the Attorney General, by Jason J. Gross, Deputy Attorney General, and, Teresita Chavez Ramilo, M.D. ("Respondent"), signed a Proposed Settlement Agreement ("Agreement") which purports to resolve all issues involved in the action by the Petitioner and the Medical Licensing Board of Indiana ("Board") regarding the Respondent's license, and which Agreement has been submitted to the Board for approval.

The Board, after reviewing the Agreement at the October 25, 2012 meeting in Room W064 of the Indiana Government Center South, 402 W. Washington Street, Indianapolis, Indiana 46204, now finds it has been entered into fairly and without fraud, duress, or undue influence, and is fair and equitable between the parties. The Board hereby incorporates the Agreement which is attached hereto and incorporated herein as **Exhibit A** and approves and adopts, in full, the Agreement as a resolution of this matter. The Board approved this Agreement by a vote of 6-0-0. Incorporated into the Agreement was the consensus of both parties to Findings of Fact, Conclusions of Law and Order. In addition, by a vote of 6-0-0, the Board ordered to impose a fine of \$1000.00 to be paid by Respondent within ninety (90) days of the issuance of this order. This fine shall be paid by cash, check, or money order to the following:

Indiana Professional Licensing Agency
Attn.: Medical Board
402 W. Washington St., Room W072
Indianapolis, IN 46204.

**BEFORE THE MEDICAL LICENSING
BOARD OF INDIANA
CAUSE NO.: 2007 MLB 0006**

STATE OF INDIANA,)
)
Petitioner,)
)
v.)
)
BRION A. BERTSCH, M.D.)
LICENSE NUMBER: 01031910A,)
)
Respondent.)
)



FINDINGS OF FACT AND ORDER

The Medical Licensing Board of Indiana (“Board”), held an administrative hearing on December 3, 2009 in Room W064 of the Indiana Professional Licensing Agency, Indiana Government Center South, 402 West Washington Street, Indianapolis, Indiana, concerning the Order to Show Cause filed by the Board against Brion A. Bertsch, M.D. (“Respondent”) on November 17, 2009.

The State of Indiana was represented by Deputy Attorney General Elizabeth Kiefner Crawford. The Respondent appeared in person without counsel and waived his right to counsel.

The Board, after considering the evidence presented and taking official notice of its file in this matter, by a vote of 6-0-0, issues the following Findings of Fact and Order:

FINDINGS OF FACT

1. On or about September 6, 2007, the Board issued its Findings of Fact, Conclusions of Law, and Order placing the Respondent’s Indiana medical license on Indefinite Probation with the terms and conditions that the Respondent, “shall remain compliant with all terms of his contract with the Indiana State Medical Association’s Physician Assistance

CERTIFICATE OF SERVICE

I certify that a copy of the "Final Order Accepting Proposed Findings of Fact, Conclusions of Law, and Order" has been duly served upon:

Teresita Chavez Ramilo
610 East Southport Road, Suite 200
Indianapolis, IN 46227
Service by U.S. Mail

John F. Williams, III
Hall, Render, Killian, Heath & Lyman
One American Square
Suite 2000, Box 82064
Indianapolis, Indiana 46282
Service by U.S. Mail

Jason J. Gross, Deputy Attorney General
Office of the Attorney General
302 West Washington Street, 5th Floor
Indianapolis, Indiana 46204
Jason.gross@atg.in.gov
Service by Email

11-7-12
Date


Donna Moran, Litigation Specialist

Medical Licensing Board of Indiana
Indiana Government Center South
402 West Washington St., Room W072
Indianapolis, IN 46204
Phone: 317-234-2960
Fax: 317-233-4236
Email: pla3@pla.in.gov

Explanation of Service Methods

Personal Service: by delivering a true copy of the aforesaid document(s) personally.

Service by U.S. Mail: by serving a true copy of the aforesaid document(s) by First Class U.S. Mail, postage prepaid.

Service by Email: by sending a true copy of the aforesaid document(s) to the individual's electronic mail address.

BEFORE THE MEDICAL LICENSING BOARD OF INDIANA
CAUSE NO. 2012 MLB 0021

IN THE MATTER OF THE LICENSE OF)
TERESITA CHAVEZ RAMILO, M.D.)
LICENSE NO: 01034652 (ACTIVE))



PROPOSED SETTLEMENT AGREEMENT

The Petitioner, the State of Indiana, by Jason J. Gross, Deputy Attorney General, ("Petitioner"), and the Respondent, Teresita Chavez Ramilo, M.D. ("Respondent"), hereby execute this Agreement to a disposition of the disciplinary complaint filed on March 14, 2012 and Amended complaint filed on September 4, 2012. This Agreement is subject to the review and approval of the Medical Licensing Board of Indiana ("the Board") and the Administrative Orders and Procedures Act, Ind. Code ch. 4-21.5-3 et seq.

STIPULATED FINDING OF FACTS

1. Respondent's address on file with the Indiana Medical Licensing Board is 610 East Southport Road, Suite 200, Indianapolis, Indiana 46227. Respondent is a licensed Physician holding Indiana license number 01034652.
2. In 2005, Respondent began treating Patient A for Depression and Adult Attention Deficit Disorder ("ADD") at Universal Behavioral Services ("UBS") in Indianapolis, Indiana.
3. In September of 2005, Respondent left UBS and discontinued her treatment of Patient A, who continued to receive treatment at UBS.
4. On or about May 7, 2007, Respondent prescribed Patient A Xanax 2mg, #90 for a thirty (30) day supply.

5. On or about May 8, 2007, Respondent began treating Patient A again at St. Francis Psychiatric Associates ("St. Francis") in Indianapolis, Indiana. Respondent diagnosed Patient A with Depression and Adult ADD. At this visit Respondent prescribed Patient A Alprazolam 2mg, #45 for a thirty (30) day supply. The Drug Enforcement Agency ("DEA") classifies Alprazolam as a Schedule IV Controlled Substance. Respondent also prescribed Focalin XR 20 mg, #30 for a 30 day supply. Focalin is the trade name for Dexmethylphenidate, which the DEA classifies as a Schedule II Controlled Substance.

6. On or about June 4, 2007, Respondent prescribed Patient A Alprazolam 2mg, #45 for a thirty (30) day supply.

7. On or about July 9, 2007, Patient A advised Respondent he had gone on a methamphetamine binge, to which Respondent advised him to receive medical treatment at Fairbanks Hospital of Indianapolis, Indiana.

8. From July 28, 2007, through June 2, 2008, Respondent prescribed medication to Patient A on seventeen (17) occasions including:

- a. Alprazolam 2mg, #90 for a thirty (30) day supply on July, 28 2007;
- b. Vyvanse 30mg, #30 for a thirty (30) day supply on July 30, 2007, Vyvanse is the trade name for Lisdexamphetamine, which the DEA classifies as a Schedule II Controlled Substance;
- c. Xanax 2mg, #60 for a thirty (30) day supply on July 30, 2007;
- d. Vyvanse 70mg, #30 for a thirty (30) day supply on October 4, 2007;
- e. Xanax 2mg, #60 for a thirty (30) day supply on October 4, 2007;

- f. Desoxyn 5mg, #120 for a thirty (30) day supply on November 27, 2007, Desoxyn is the trade name for methamphetamine, which the DEA classifies as a Schedule II Controlled Substance;
- g. Desoxyn 5mg, #120 for a thirty (30) day supply on December 12, 2007;
- h. Desoxyn 5mg, #120 for a thirty (30) day supply on January 22, 2008;
- i. Desoxyn 5mg, #180 for a thirty (30) day supply on February 6, 2008;
- j. Xanax 2mg, #60 for a thirty (30) day supply on February 6, 2008;
- k. Alprazolam 2mg, #60 for a thirty (30) day supply on February 23, 2008;
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- n. Desoxyn 5mg, #180 for a thirty (30) day supply on April 2, 2008;
- o. Xanax 2mg, #14 for a seven (7) day supply on May 23, 2008; and,
- p. Desoxyn 5mg, #180 for a thirty (30) day supply on June 2, 2008.

9. There is no indication in Patient A's medical record that Respondent performed any drug screens, ran an INSPECT report, or had Patient A sign any type of substance abuse contract. Further, there is no discussion in Patient A's medical record that Respondent followed up on any treatment received by Patient A from Fairbanks Hospital regarding his methamphetamine binge in July 2007.

STIPULATED CONCLUSIONS OF LAW

10. Respondent's conduct as described above constitutes a violation of Indiana Code § 25-1-9-4(a)(9) in that Respondent has knowingly prescribed a substance classified as a narcotic, addicting, or dangerous drug to a known addict or habitué as evidenced by

Respondent's prescribing controlled substances to patient A after Respondent was informed that Patient A had undergone a methamphetamine binge in July, 2007.

11. Respondent's conduct as described above constitutes a violation of Indiana Code § 25-1-9-4(a)(4)(A) in that Respondent has continued to practice although Respondent has become unfit to practice due to professional incompetence in that Respondent failed to take reasonable precautions to identify or address Patient A's addiction.

TERMS AND CONDITIONS

1. The Board has jurisdiction over the Respondent and the subject matter in this disciplinary action commenced on or about March 14, 2012, with an Amended Complaint filed on September 4, 2012.

2. The parties execute this Agreement voluntarily.

3. Respondent and Petitioner voluntarily waive their rights to a public hearing on the Complaint and all other proceedings in this action to which either party may be entitled by law, including judicial appeal or review. However, the parties agree that any limitation on Respondent's right to appeal and seek judicial review shall be restricted to the terms of this Settlement Agreement or the Final Order. Respondent's right to appeal and seek judicial review of any additional action taken against her license due to non-compliance shall not be restricted.

4. Petitioner agrees that the terms of this Agreement will resolve any and all outstanding claims or allegations or potential claims or allegations relating to disciplinary action against Respondent's license arising from the Complaint filed on March 14, 2012 and Amended complaint filed on September 4, 2012.

5. Respondent has carefully read and examined this agreement and fully understands its terms and that, subject to a final order issued by the Board, this Agreement is a final disposition of all matters and not subject to further review.

6. Respondent's Indiana medical license shall be shall be placed on **INDEFINITE PROBATION** with no right to petition for withdrawal from probation for one (1) year and until Respondent has demonstrated the following:

- a. Respondent shall complete the three (3) day, 21.75 hour "Prescribing Controlled Substances Course" at Vanderbilt Medical Center and provide written confirmation of completion to the Board.
- b. Respondent will participate in continuing medical education related to managing patients with Attention Deficit Disorder and present documentation of same to the Board;
- c. Respondent will maintain a log of controlled substances prescribed over the course of her probation and provide it to the Board for inspection upon request.

7. Prior to petitioning for withdrawal, Respondent shall, pursuant to Ind. Code §4-6-14-10(b), pay a fee of Five Dollars (\$5.00) to be deposited into the Health Records and Personal Identifying Information Protection Trust Fund. This fee shall be paid by check or money order payable to the State of Indiana, and submitted to the Indiana Office of the Attorney General to the attention of Katherine Thorpe.

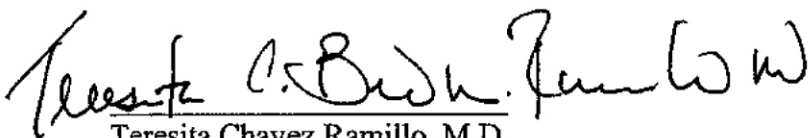
8. Respondent further understands that non-compliance with the Final Order, any non-compliance with the statutes or regulations regarding the practice of medicine, or any non-

compliance with the Settlement Agreement may result in the State requesting an emergency suspension of Respondent's license, an Order to Show Cause as may be issued by the Board, or a new cause of action pursuant to Ind. Code §25-1-9-4, any or all of which could lead to additional sanctions, up to and including a revocation of Respondent's license.

9. The parties agree to the continuing jurisdiction of the Board and further agree the Board shall have the sole authority to determine Respondent's non-compliance through a fact finding hearing that is open to the public.

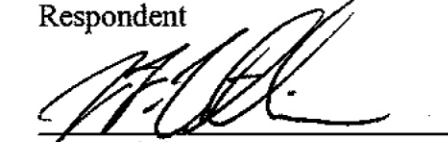
10. Respondent agrees to personally appear for the presentation of this Agreement and to pay for a copy of the transcript of the presentation of this Agreement to the Board and the court reporter fees associated with this matter.

11. Respondent agrees that the Board has the discretion to issue a fine for non-compliance with the terms of this Settlement Agreement or the Final Order.

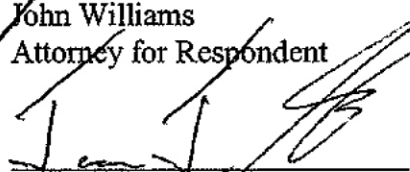


Teresita Chavez Ramillo, M.D.
Respondent

9/25/12
Date


John Williams
Attorney for Respondent

10/9/12
Date


Jason J. Gross
Deputy Attorney General
Attorney No. 23587-49

10/15/12
Date

STATE OF INDIANA)
) SS:
COUNTY OF Marion)



Before me a Notary Public for said County and State, personally appeared Teresita Chavez Ramilo, M.D. and being first duly sworn by me upon his/her oath, says that the facts alleged in the foregoing instrument are true.

Signed and sealed this 25th day of Sept, 2012.

Maryann Davidson

Signature

Maryann Davidson

Printed

My Commission Expires: 1-6-2015

County of Residence: MARION