



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
Olympia, Washington 98504

RE: Bobbi Lutack  
Master Case No.: M2014-51  
Document: Stipulation to Informal Disposition

Regarding your request for information about the above-named practitioner; attached is a true and correct copy of the document on file with the State of Washington, Department of Health, Adjudicative Clerk Office. These records are considered Certified by the Department of Health.

Certain information may have been withheld pursuant to Washington state laws. While those laws require that most records be disclosed on request, they also state that certain information should not be disclosed.

The following information has been withheld: **NONE**

If you have any questions or need additional information regarding the information that was withheld, please contact:

Customer Service Center  
P.O. Box 47865  
Olympia, WA 98504-7865  
Phone: (360) 236-4700  
Fax: (360) 586-2171

You may appeal the decision to withhold any information by writing to the Privacy Officer, Department of Health, P.O. Box 47890, Olympia, WA 98504-7890.

STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
BOARD OF NATUROPATHY

In the Matter of

**BOBBI LUTACK**  
Credential No. NATU.NT.00000689

Respondent

No. M2014-51

**STIPULATION TO INFORMAL  
DISPOSITION**

**1. STIPULATION**

1.1 The Executive Director of the Board of Naturopathy (Board), on designation by the Board, has made the following allegations.

- A. On September 20, 1993, the state of Washington issued Respondent a credential to practice as a naturopathic physician. Respondent's credential is currently active.
- B. From approximately 2005 through 2013, while working as a naturopathic physician in Washington, Respondent wrote prescriptions for at least twelve (12) patients beyond her prescriptive authority, in violation of WAC 246-836-210. Unauthorized prescriptions include, but are not limited to, Alprazolam, Lorazepam, Clonazepam, Diazepam, Zolpidem, Hydrocodone, and Qsymia.
- C. Patient records were obtained which demonstrate the following unauthorized prescriptions written by Respondent for the following Patients:

**Patient A**

- D. Between approximately 2005 through 2013, Respondent treated Patient A. Patient A reported health concerns of tension headaches. Chart notes for Patient A demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescription:
  - I. Clonazepam.

### **Patient B**

- E. Between approximately 2010 through 2013, Respondent treated Patient B. Patient B reported current or recent health concerns including fever, rash, eye pain, eye redness and ringing in ears, joint pain or stiffness and history of thyroid problems. Chart notes for Patient B demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescriptions:
- I. Hydrocodone;
  - II. Diazepam; and
  - III. Zolpidem.

### **Patient C**

- F. Between approximately 2009 through 2013, Respondent treated Patient C. Patient C reported current or recent health concerns including fatigue/tiredness, weight problems, tension headaches, sinus problems, dental problems, history of anemia, frequent bladder infections and anxiety. Chart notes for Patient C demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescriptions:
- I. Alprazolam; and
  - II. Zolpidem.

### **Patient D**

- G. Between approximately 2011 through 2013, Respondent treated Patient D. Patient D reported current or recent health concerns including night sweats, fatigue/tiredness, weight problems, itching, frequent headaches, history of migraine, vision problems, hearing loss, ringing in right ear, hay fever/allergies, frequent sore throat, sore tongue, dental problems, swollen glands, easy bleeding or bruising, cough, trouble swallowing, abdominal pain and bloating, frequency urinating, excessive menstrual bleeding/pain, yeast infections, varicose veins, pain in legs with walking, joint pain or stiffness, muscle cramps or spasms, weakness, depression, sleep problems, mood swings, anxiety, phobias, low blood sugar,

excessive thirst, and weight gain. Chart notes for Patient D demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescription:

- I. Zolpidem.

**Patient E**

H. Between approximately 2010 through 2013, Respondent treated Patient E. Patient E reported current or recent health concerns including fatigue/tiredness, frequent headaches, history of migraine, tension headaches, ringing in the ears, heartburn, abdominal pain, nausea, gas, muscle cramps or spasms, depression, mood swings, anxiety, tension, and family history of psychiatric disorder. Chart notes for Patient E demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescription:

- I. Zolpidem.

**Patient F**

I. Between approximately 2009 through 2013, Respondent treated Patient F. Patient F's records do not contain an intake form reporting current or recent health concerns that Patient F was experiencing. Chart notes for Patient F demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescription:

- I. Qsymia.

**Patient G**

J. Between approximately 2009 through 2013, Respondent treated Patient G. Patient G reported current or recent health concerns including fatigue/tiredness, ashen and itching skin, eye pain, eye redness, hearing loss, snoring, neck pain, chest pain or discomfort on occasion, heartburn, gas, urinary dribbling, cold hands and feet, joint pain or stiffness, depression, sleep problems, anxiety, nervousness, tension, phobias, family history of psychiatric disorder and history of thyroid problems. Chart notes for Patient G

demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescriptions:

- I. Lorazepam; and
- II. Zolpidem.

**Patient H**

K. Between approximately 2006 through 2012, Respondent treated Patient H. Patient H reported current or recent health concerns including fatigue/tiredness, weight problems, shortness of breath with activity, dizzy spells if getting up fast, excessive menstrual bleeding/pain and joint pain or stiffness. Chart notes for Patient H demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescription:

- I. Hydrocodone.

**Patient I**

L. In approximately 2012, Respondent treated Patient I. Patient I reported current or recent health concerns including fatigue/tiredness, fibromyalgia, itching, blood in stool, unusual discharge, excessive menstrual bleeding, vaginal discharge and itching, joint pain or stiffness, depression, anxiety, history of thyroid problems, and excessive thirst. Chart notes for Patient I demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescription:

- I. Lorazepam.

**Patient J**

M. In approximately 2010 through 2013, Respondent treated Patient J. Patient J reported current or recent health concerns including night sweats, fatigue/tiredness, weight problems, appetite change, fever, itching on left foot, frequent headaches, history of migraine, tension headaches, vision problems, ringing in ears, frequent sore throat, swollen glands, neck pain, history of blood clotting, abdominal bloating, urinary frequency, muscle cramps or spasms, sleep problems, mood swings, anxiety and excessive thirst on and off.

Chart notes for Patient J demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescription:

- I. Alprazolam.

**Patient K**

N. In approximately 2009 through 2013, Respondent treated Patient K. Patient K's records do not contain an intake form completed by Patient K reporting current or recent health concerns that Patient M was experiencing. Chart notes for Patient K demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescription:

- I. Zolpidem.

**Patient L**

O. In approximately 2009 through 2013, Respondent treated Patient L. Patient L reported current or recent health concerns including fatigue/tiredness, weight problems, fever, history of migraine, tension headaches, head injury, eye problems, tearing problems, sinus problems, frequent sneezing, hay fever/allergies, snoring, frequent sore throat, swollen glands, bruising, history of anemia, dizzy spells, black tarry stools, abdominal bloating, gas, frequent urinating, excessive menstrual bleeding, hot flashes, family history of breast cancer, joint pain or stiffness, history of broken bones, muscle cramps or spasms, weakness, depression, sleep problems, mood swings, anxiety, tension, suicidal thoughts, excessive thirst and weight gain. Chart notes for Patient L demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescription:

- I. Hydrocodone.

1.2 Respondent does not admit any of the allegations in the Statement of Allegations and Summary of Evidence or in Paragraph 1.1 above. This Stipulation to Informal Disposition (Stipulation) shall not be construed as a finding of unprofessional conduct or inability to practice.

1.3 Respondent acknowledges that a finding of unprofessional conduct or inability to practice based on the above allegations, if proven, would constitute grounds for discipline under RCW 18.130.180(7) and (12), RCW 18.36A.020(10), RCW 18.36A.040, and WAC 246-836-210.

1.4 Respondent agrees that under RCW 18.130.172, any sanction as set forth in RCW 18.130.160, except subsections (1), (2), (6), and (8), may be imposed as part of this Stipulation, but the Respondent may agree to reimburse the disciplining authority the costs of investigation and processing the complaint up to an amount not exceeding one thousand dollars (\$1,000.00) per allegation.

1.5 The parties wish to resolve this matter by means of this Stipulation pursuant to RCW 18.130.172(1).

1.6 This Stipulation is of no force and effect and is not binding on the parties unless and until it is accepted by the Board.

1.7 This Stipulation is not formal disciplinary action. However, if the Board accepts this Stipulation, it will be reported to the National Practitioner Databank (45 CFR Part 60) and elsewhere as required by law. It is a public document and will be placed on the Department of Health's website and otherwise disseminated as required by the Public Records Act (Chap. 42.56 RCW).

1.8 The Board agrees to forgo further disciplinary proceedings concerning the allegations.

1.9 Respondent agrees to successfully complete the terms and conditions of this informal disposition.

1.10 Respondent understands that a violation of this Stipulation, if proven, would constitute grounds for discipline under RCW 18.130.180 and the imposition of sanctions under RCW 18.130.160.

## **2. COMPLIANCE WITH SANCTION RULES**

2.1 The disciplining authority applies WAC 246-16-800, *et seq.*, to determine appropriate sanctions. WAC 246-16-800(2)(c) requires the disciplining authority to impose terms based on a specific sanction schedule unless "the schedule does not adequately address the facts in a case."

2.2 The sanction schedules stated in rule do not address the conduct in this case. RCW 18.130.390 and WAC 246-16-800(2)(d) require the disciplining authority to

use its judgment to determine appropriate sanctions when the sanction schedules do not address the conduct in question. The disciplining authority determined that a period of probation with continuing education and PMP oversight will adequately address the alleged misconduct.

### 3. INFORMAL DISPOSITION

The parties agree to the following:

3.1 Respondent's credential to practice as a naturopathic physician in the state of Washington shall be placed on **PROBATION** for at least twelve (12) months commencing on the effective date of this Stipulation. During the course of probation, Respondent shall comply with all of the following terms and conditions.

3.2 Respondent shall take and pass the Board's jurisprudence examination within six (6) months of the effective date of this Stipulation.

3.3 For at least twelve (12) months commencing on the effective date of this Stipulation, the Board may collect and review Prescription Monitoring Audit Reports or prescriber history reports that name Respondent as a prescriber. These reports may include prescriber, dispenser or patient history reports.

3.4 Within twelve (12) months of the effective date of this Stipulation, Respondent shall complete a minimum of four (4) hours of continuing education, pre-approved by the Board, in the area of Controlled Substances and Prescribing in Washington. Respondent shall provide the Board with proof of completion of such continuing education within thirty (30) days of such completion. Failure to complete the required minimum hours of pre-approved continuing education in the specified area within the specified times for completion and confirmation thereof shall constitute violations of this Stipulation. These four (4) hours of continuing education shall be in addition to mandatory continuing education hours that may be required for credential renewal.

3.5 Respondent shall reimburse costs to the Board in the amount of one thousand four hundred seventy-one dollars and sixty-one cents (\$1,471.61), which must be received by the Board within twelve (12) months of the effective date of this Stipulation. The reimbursement shall be paid by certified or cashier's check or money order, made payable to the Department of Health and mailed to the Department of Health, Board of Naturopathy, at PO.Box 1099, Olympia, WA 98507-1099. Credit or



Debit cards can also be used for payment at the front counter of the Department of Health building at 111 Israel Road SE, Tumwater, WA 98501, during regular business hours.

3.6 Any documents required by this Stipulation shall be sent to Department of Health Compliance at PO Box 47873, Olympia, WA 98504-7873.


3.7 Respondent is responsible for all costs of complying with this Stipulation.

3.8 Respondent shall inform the Department of Health Office of Customer Service, in writing, of changes in Respondent's residential and/or business address within thirty (30) days of the change. The mailing address for the Office of Customer Service is PO Box 47865, Olympia, WA 98504-7865.

3.9 The effective date of this Stipulation is the date the Adjudicative Clerk Office places the signed Stipulation into the U.S. mail. If required, Respondent shall not submit any fees or compliance documents until after the effective date of this Stipulation.

**4. RESPONDENT'S ACCEPTANCE**

I, BOBBI LUTACK, have read, understand and agree to this Stipulation. This Stipulation may be presented to the Board without my appearance. I understand that I will receive a signed copy if the Board accepts this Stipulation.

  
\_\_\_\_\_  
**BOBBI LUTACK**  
RESPONDENT

7/11/14  
\_\_\_\_\_  
DATE

\_\_\_\_\_, WSBA #  
ATTORNEY FOR RESPONDENT

\_\_\_\_\_  
DATE

**5. BOARD ACCEPTANCE**

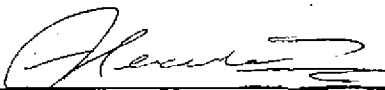
The Board accepts this Stipulation to Informal Disposition. All parties shall be bound by its terms and conditions.

DATED: 7/14/14, 2014

STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
BOARD OF NATUROPATHY

  
\_\_\_\_\_  
PANEL CHAIR

PRESENTED BY:

  
\_\_\_\_\_  
ALEXANDER H. LEE, WSBA #35824  
DEPARTMENT OF HEALTH STAFF ATTORNEY

7/11/14  
\_\_\_\_\_  
DATE



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
Olympia, Washington 98504

RE: Bobbi Lutack  
Master Case No.: M2014-51  
Document: Statement of Allegations

Regarding your request for information about the above-named practitioner; attached is a true and correct copy of the document on file with the State of Washington, Department of Health, Adjudicative Clerk Office. These records are considered Certified by the Department of Health.

Certain information may have been withheld pursuant to Washington state laws. While those laws require that most records be disclosed on request, they also state that certain information should not be disclosed.

The following information has been withheld:

The identity of the complainant if the person is a consumer, health care provider, or employee, pursuant to RCW 43.70.075 (Identity of Whistleblower Protected) and/or the identity of a patient, pursuant to RCW 70.02.020 (Medical Records - Health Care Information Access and Disclosure)

If you have any questions or need additional information regarding the information that was withheld, please contact:

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STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
BOARD OF NATUROPATHY

FILED  
JUL 15 2014  
Adjudicative Clerk Office

In the Matter of

No. M2014-51

**BOBBI LUTACK**  
Credential No. NATU.NT.00000689

**STATEMENT OF ALLEGATIONS  
AND SUMMARY OF EVIDENCE**

Respondent

The Executive Director of the Board of Naturopathy (Board), on designation by the Board, makes the allegations below, which are supported by evidence contained in case no. 2013-5956. The patients referred to in this Statement of Allegations and Summary of Evidence are identified in the attached Confidential Schedule.

**1. ALLEGED FACTS**

1.1 On September 20, 1993, the state of Washington issued Respondent a credential to practice as a naturopathic physician. Respondent's credential is currently active.

1.2 From approximately 2005 through 2013, while working as a naturopathic physician in Washington, Respondent wrote prescriptions for at least twelve (12) patients beyond her prescriptive authority, in violation of WAC 246-836-210. Unauthorized prescriptions include, but are not limited to, Alprazolam, Lorazepam, Clonazepam, Diazepam, Zolpidem, Hydrocodone, and Qsymia.

1.3 Patient records were obtained which demonstrate the following unauthorized prescriptions written by Respondent for the following Patients:

**Patient A**

1.4 Between approximately 2005 through 2013, Respondent treated Patient A. Patient A reported health concerns of tension headaches. Chart notes for Patient A demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescription:

A. Clonazepam.

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### **Patient B**

1.5 Between approximately 2010 through 2013, Respondent treated Patient B. Patient B reported current or recent health concerns including fever, rash, eye pain, eye redness and ringing in ears, joint pain or stiffness and history of thyroid problems. Chart notes for Patient B demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescriptions:

- A. Hydrocodone;
- B. Diazepam; and
- C. Zolpidem.

### **Patient C**

1.6 Between approximately 2009 through 2013, Respondent treated Patient C. Patient C reported current or recent health concerns including fatigue/tiredness, weight problems, tension headaches, sinus problems, dental problems, history of anemia, frequent bladder infections and anxiety. Chart notes for Patient C demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescriptions:

- A. Alprazolam; and
- B. Zolpidem.

### **Patient D**

1.7 Between approximately 2011 through 2013, Respondent treated Patient D. Patient D reported current or recent health concerns including night sweats, fatigue/tiredness, weight problems, itching, frequent headaches, history of migraine, vision problems, hearing loss, ringing in right ear, hay fever/allergies, frequent sore throat, sore tongue, dental problems, swollen glands, easy bleeding or bruising, cough, trouble swallowing, abdominal pain and bloating, frequency urinating, excessive menstrual bleeding/pain, yeast infections, varicose veins, pain in legs with walking, joint pain or stiffness, muscle cramps or spasms, weakness, depression, sleep problems, mood swings, anxiety, phobias, low blood sugar, excessive thirst, and weight gain. Chart notes for Patient D demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescription:

- A. Zolpidem.

### **Patient E**

1.8 Between approximately 2010 through 2013, Respondent treated Patient E. Patient E reported current or recent health concerns including fatigue/tiredness, frequent headaches, history of migraine, tension headaches, ringing in the ears, heartburn, abdominal pain, nausea, gas, muscle cramps or spasms, depression, mood swings, anxiety, tension, and family history of psychiatric disorder. Chart notes for Patient E demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescription:

- A. Zolpidem.

### **Patient F**

1.9 Between approximately 2009 through 2013, Respondent treated Patient F. Patient F's records do not contain an intake form completed by Patient F reporting current or recent health concerns that Patient F was experiencing. Chart notes for Patient F demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescription:

- A. Qsymia.

### **Patient G**

1.10 Between approximately 2009 through 2013, Respondent treated Patient G. Patient G reported current or recent health concerns including fatigue/tiredness, ashen and itching skin, eye pain, eye redness, hearing loss, snoring, neck pain, chest pain or discomfort on occasion, heartburn, gas, urinary dribbling, cold hands and feet, joint pain or stiffness, depression, sleep problems, anxiety, nervousness, tension, phobias, family history of psychiatric disorder and history of thyroid problems. Chart notes for Patient G demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescriptions:

- A. Lorazepam; and
- B. Zolpidem.

### **Patient H**

1.11 Between approximately 2006 through 2012, Respondent treated Patient H. Patient H reported current or recent health concerns including fatigue/tiredness, weight problems, shortness of breath with activity, dizzy spells if getting up fast, excessive

menstrual bleeding/pain and joint pain or stiffness. Chart notes for Patient H demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescription:

- A. Hydrocodone.

**Patient I**

1.12 In approximately 2012, Respondent treated Patient I. Patient I reported current or recent health concerns including fatigue/tiredness, fibromyalgia, itching, blood in stool, unusual discharge, excessive menstrual bleeding, vaginal discharge and itching, joint pain or stiffness, depression, anxiety, history of thyroid problems, and excessive thirst. Chart notes for Patient I demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescription:

- A. Lorazepam.

**Patient J**

1.13 In approximately 2010 through 2013, Respondent treated Patient J. Patient J reported current or recent health concerns including night sweats, fatigue/tiredness, weight problems, appetite change, fever, itching on left foot, frequent headaches, history of migraine, tension headaches, vision problems, ringing in ears, frequent sore throat, swollen glands, neck pain, history of blood clotting, abdominal bloating, urinary frequency, muscle cramps or spasms, sleep problems, mood swings, anxiety and excessive thirst on and off. Chart notes for Patient J demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescription:

- A. Alprazolam.

**Patient K**

1.14 In approximately 2009 through 2013, Respondent treated Patient K. Patient K's records do not contain an intake form completed by Patient K reporting current or recent health concerns that Patient K was experiencing. Chart notes for Patient K demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescription:

- A. Zolpidem.

**Patient L**

1.15 In approximately 2009 through 2013, Respondent treated Patient L.

Patient L reported current or recent health concerns including fatigue/tiredness, weight problems, fever, history of migraine, tension headaches, head injury, eye problems, tearing problems, sinus problems, frequent sneezing, hay fever/allergies, snoring, frequent sore throat, swollen glands, bruising, history of anemia, dizzy spells, black tarry stools, abdominal bloating, gas, frequent urinating, excessive menstrual bleeding, hot flashes, family history of breast cancer, joint pain or stiffness, history of broken bones, muscle cramps or spasms, weakness, depression, sleep problems, mood swings, anxiety, tension, suicidal thoughts, excessive thirst and weight gain. Chart notes for Patient L demonstrate Respondent prescribed and/or authorized refills for the following unauthorized prescription:

A. Hydrocodone.

## 2. SUMMARY OF EVIDENCE

- 2.1 Respondent's self-report and statement.
- 2.2 Prescription Monitoring Program reports.
- 2.3 Prescription records.
- 2.4 Patient Records.

## 3. ALLEGED VIOLATIONS

3.1 The facts alleged in Section 1, if proven, would constitute unprofessional conduct in violation of RCW 18.130.180(7) and (12), RCW 18.36A.020(10), RCW 18.36A.040, and WAC 246-836-210, which provide:

**RCW 18.130.180 Unprofessional conduct.** The following conduct, acts, or conditions constitute unprofessional conduct for any license holder under the jurisdiction of this chapter:

...

(7) Violation of any state or federal statute or administrative rule regulating the profession in question, including any statute or rule defining or establishing standards of patient care or professional conduct or practice;

...

(12) Practice beyond the scope of practice as defined by law or rule;

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**RCW 18.36A.020 Definitions.** Unless the context clearly requires otherwise, the definitions in this section apply throughout this chapter.

...

(10) "Naturopathic medicines" means vitamins; minerals; botanical medicines; homeopathic medicines; hormones; and those legend drugs and controlled substances consistent with naturopathic medical practice in accordance with rules established by the board. **Controlled substances are limited to codeine and testosterone products that are contained in Schedules III, IV, and V in chapter 69.50 RCW.**

....

**RCW 18.36A.040 Scope of practice.**

Naturopathic medicine is the practice by naturopaths of the art and science of the diagnosis, prevention, and treatment of disorders of the body by stimulation or support, or both, of the natural processes of the human body. A naturopath is responsible and accountable to the consumer for the quality of naturopathic care rendered.

The practice of naturopathic medicine includes manual manipulation (mechanotherapy), the prescription, administration, dispensing, and use, except for the treatment of malignancies, of nutrition and food science, physical modalities, minor office procedures, homeopathy, naturopathic medicines, hygiene and immunization, contraceptive devices, common diagnostic procedures, and suggestion; however, nothing in this chapter shall prohibit consultation and treatment of a patient in concert with a practitioner licensed under chapter 18.57 or 18.71 RCW. No person licensed under this chapter may employ the term "chiropractic" to describe any services provided by a naturopath under this chapter.

**WAC 246-836-210 Authority to use, prescribe, dispense and order.**

(1) Naturopathic medical practice includes the prescription, administration, dispensing, and use of:

(a) Nutrition and food science, physical modalities, minor office procedures, homeopathy, hygiene, and immunizations/vaccinations;

(b) Contraceptive devices;

(c) Nonlegend medicines including vitamins, minerals, botanical medicines, homeopathic medicines, and hormones;

(d) Legend drugs as defined under RCW 69.41.010 with the exception of Botulinum Toxin (commonly known as, among other names, Botox, Vistabel,

Dysport, or Neurobloc) and inert substances used for cosmetic purposes;  
and

(e) Codeine and testosterone products that are contained within Schedules III, IV, and V in chapters 69.50 RCW and 246-887 WAC.

#### 4. NOTICE TO RESPONDENT

4.1 The Board has determined that this case may be appropriate for resolution through a Stipulation to Informal Disposition (Stipulation) pursuant to RCW 18.130.172(2). A proposed Stipulation is attached, which contains the disposition the Board believes is necessary to address the conduct alleged in this Statement of Allegations and Summary of Evidence.

4.2 If Respondent agrees that the disposition imposed by the Stipulation is appropriate, Respondent should sign and date the Stipulation and return it within twenty-eight (28) days to the Department of Health Office of Legal Services at PO Box 47873, Olympia, WA 98504-7873.

4.3 If Respondent does not agree that the terms and conditions contained in the Stipulation are appropriate, Respondent should contact Alexander H. Lee, Department of Health Staff Attorney, PO Box 47873, Olympia, WA 98504-7873, (360) 236-4784, within twenty-eight (28) days.

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4.4 If Respondent does not respond within twenty-eight (28) days, the Board will assume Respondent has declined to resolve these allegations with an informal Stipulation and may proceed to formal disciplinary action against Respondent by filing a Statement of Charges pursuant to RCW 18.130.172(3).

4.5 If the parties cannot resolve the allegations with an informal Stipulation, the Board may proceed with a formal Statement of Charges.

DATED: April 4, 2014

STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
BOARD OF NATUROPATHY

  
CHRIS HUMBERSON  
EXECUTIVE DIRECTOR

  
ALEXANDER H. LEE, WSBA #35824  
DEPARTMENT OF HEALTH STAFF ATTORNEY

**CONFIDENTIAL SCHEDULE**

**This information is confidential and is NOT to be released without the consent of the individual or individuals named herein. RCW 42.56.240(1)**

Patient A:

Patient B:

Patient C:

Patient D:

Patient E:

Patient F:

Patient G:

Patient H:

Patient I:

Patient J:

Patient K:

Patient L:

