

FILED

JUL 31 2015

BEFORE THE
OSTEOPATHIC MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

OSTEOPATHIC MEDICAL BOARD
OF CALIFORNIA

In the Matter of the Accusation Against:

LISA J. HUNT, D.O.
1300 Mable Avenue #C
Modesto, CA 95355

Osteopathic Physician's and Surgeon's
License No. 20A6338

Respondent

Case No. 00-2011-3237

OA# No: 2014090659

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Osteopathic Medical Board of California, Department of Consumer Affairs, as its Decision in the above-entitled matter.

This Decision shall become effective on

August 17, 2015

It is so ORDERED

July 31, 2015



JOSEPH A. ZAMMUTO, D.O., PRESIDENT
FOR THE OSTEOPATHIC MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS

1 KAMALA D. HARRIS
Attorney General of California
2 E. A. JONES III
Supervising Deputy Attorney General
3 WENDY WIDLUS
Deputy Attorney General
4 State Bar No. 82958
California Department of Justice
5 300 So. Spring Street, Suite 1702
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7 E-mail: Wendy.Widlus@doj.ca.gov
Attorneys for Complainant

8
9 **BEFORE THE**
OSTEOPATHIC MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

12 **LISA J. HUNT, D.O.**
13 1300 Mable Avenue, #C
Modesto, California 95355

14 Osteopathic Physician's and Surgeon's
15 Certificate No. 6338,

16 Respondent.

Case No. 00-2011-3237

OAH No. 2014090659

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

17
18 **IT IS HEREBY STIPULATED AND AGREED** by and between the parties to the above-
19 entitled proceedings that the following matters are true:

20 **PARTIES**

21 1. Angelina M. Burton ("Complainant") is the Executive Director of the Osteopathic
22 Medical Board of California (Board). She brought this action solely in her official capacity and is
23 represented in this matter by Kamala D. Harris, Attorney General of the State of California, by
24 Wendy Widlus, Deputy Attorney General.

25 2. Respondent LISA J. HUNT, D.O. ("Respondent") is represented in this proceeding
26 by attorney Gary Wittenberg, Esq., whose address is: Baranov & Wittenberg, LLP, 1901 Avenue
27 of the Stars, Suite 1750, Los Angeles, California 90067-6056, and Jacques S. Simon, Esq.,
28 whose address is: 2174 Hewlett Avenue, Suite 201, Merrick, New York, 11566.

1 3. On or about July 23, 1992, the Board issued Osteopathic Physician's and Surgeon's
2 Certificate No. 6338 to Respondent. The Osteopathic Physician's and Surgeon's Certificate was
3 in full force and effect at all times relevant to the charges brought in Amended Accusation No.
4 00-2011-3237 and will expire on April 30, 2016, unless renewed.

5 **JURISDICTION**

6 4. Amended Accusation No. 00-2011-3237 was filed before the Board, and is currently
7 pending against Respondent. The Amended Accusation and all other statutorily required
8 documents were properly served on Respondent on May 27, 2015. Respondent timely filed her
9 Notice of Defense contesting the Accusation.

10 5. A copy of Amended Accusation No. 00-2011-3237 is attached as exhibit A and
11 incorporated herein by reference.

12 **ADVISEMENT AND WAIVERS**

13 6. Respondent has carefully read, fully discussed with counsel, and understands the
14 charges and allegations in Amended Accusation No. 00-2011-3237. Respondent has also
15 carefully read, fully discussed with counsel, and understands the effects of this Stipulated
16 Settlement and Disciplinary Order.

17 7. Respondent is fully aware of her legal rights in this matter, including the right to a
18 hearing on the charges and allegations in the Amended Accusation; the right to be represented by
19 counsel at her own expense; the right to confront and cross-examine the witnesses against her; the
20 right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas
21 to compel the attendance of witnesses and the production of documents; the right to
22 reconsideration and court review of an adverse decision; and all other rights accorded by the
23 California Administrative Procedure Act and other applicable laws.

24 8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
25 every right set forth above.

26 **CULPABILITY**

27 9. Respondent understands and agrees that the charges and allegations in Amended
28 Accusation No. 00-2011-3237, if proven at a hearing, constitute cause for imposing discipline

1 Osteopathic Physician's and Surgeon's Certificate.

2 10. For the purpose of resolving the Amended Accusation without the expense and
3 uncertainty of further proceedings, Respondent does not contest that, at an administrative hearing,
4 Complainant could establish a *prima facie* case with respect to the charges in the Second Cause
5 for Discipline in the Amended Accusation, and Respondent hereby gives up her right to contest
6 those charges. Respondent agrees that her Osteopathic Physician's and Surgeon's Certificate is
7 subject to discipline and she agrees to be bound by the Board's imposition of discipline as set
8 forth in the Disciplinary Order below.

9 **CONTINGENCY**

10 11. This stipulation shall be subject to approval by the Board. Respondent understands
11 and agrees that counsel for Complainant and the staff of the Board may communicate directly
12 with the Board regarding this stipulation and settlement, without notice to or participation by
13 Respondent or her counsel. By signing the stipulation, Respondent understands and agrees that
14 she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board
15 considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order,
16 the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this
17 paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not
18 be disqualified from further action by having considered this matter.

19 12. The parties understand and agree that Portable Document Format (PDF) and facsimile
20 copies of this Stipulated Settlement and Disciplinary Order for Public Reprimand, including PDF
21 and facsimile signatures thereto, shall have the same force and effect as the originals.

22 13. In consideration of the foregoing admissions and stipulations, the parties agree that
23 the Board may, without further notice or formal proceeding, issue and enter the following
24 Disciplinary Order:

25 **DISCIPLINARY ORDER**

26 **IT IS HEREBY ORDERED** that Respondent Lisa J. Hunt, D.O., as holder of Osteopathic
27 Physician's and Surgeon's Certificate No. 6338, shall be and is hereby publicly reprimanded
28 pursuant to California Business and Professions Code section 2227, subdivision (a) (4). This

1 Public Reprimand, with terms and conditions as set forth below, is issued in connection with
2 Respondent's care and treatment of patient K as set forth in Amended Accusation No. 00-2011-
3 3237, as a result of the following:

4 Respondent failed to maintain adequate and accurate records relating to the provision of
5 medical services to patient K.

6 1. **MEDICAL RECORD KEEPING COURSE.** Within 60 calendar days of the
7 effective date of this Decision, Respondent shall enroll in a course in medical record keeping
8 equivalent to the Medical Record Keeping Course offered by the Physician Assessment and
9 Clinical Education Program, University of California, San Diego School of Medicine (PACE),
10 approved in advance by the Board or its designee. Respondent shall successfully complete the
11 medical record keeping course within one (1) year of the effective date of this Order. The
12 medical record keeping course shall be at Respondent's expense and shall be in addition to any
13 Continuing Medical Education (CME) requirements for renewal of licensure. Respondent shall
14 submit a certificate of successful completion to the Board or its designee not later than thirty (30)
15 calendar days after successfully completing the course. Failure to participate in or successfully
16 complete the medical record keeping course outlined above shall constitute unprofessional
17 conduct and grounds for further disciplinary proceedings.

18 2. **CLINICIAN-PATIENT COMMUNICATION COURSE.** Within 60 calendar
19 days of the effective date of this Decision, Respondent shall enroll in a course entitled "Clinician-
20 Patient Communication" offered by the Physician Assessment and Clinical Education Program,
21 University of California, San Diego School of Medicine (PACE). Respondent shall successfully
22 complete the "Clinician-Patient Communication" course within one (1) year of the effective date
23 of this Order. The course shall be at Respondent's expense and shall be in addition to any
24 Continuing Medical Education (CME) requirements for renewal of licensure. Respondent shall
25 submit a certificate of successful completion to the Board or its designee not later than thirty (30)
26 calendar days after successfully completing the course. Failure to participate in or successfully
27 complete the "Clinician-Patient Communication" course outlined above shall constitute
28 unprofessional conduct and grounds for further disciplinary proceedings.

1 3. **COSTS RECOVERY.** Within ninety (90) days of the effective date of this Order,
2 Respondent shall reimburse the Board the sum of \$5,500.00 for its investigative and prosecutorial
3 costs incurred in this action. Respondent may make scheduled payments in a manner agreeable to
4 the Board or its designee, and within thirty (30) calendar days of the effective date of this Order,
5 Respondent shall propose such a payment schedule. The filing of bankruptcy shall not relieve
6 Respondent of her responsibility to reimburse the Board for these costs. Failure to reimburse the
7 Board as outlined above shall constitute unprofessional conduct and grounds for further
8 disciplinary proceedings.

9 **ACCEPTANCE**

10 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
11 discussed it with my attorneys, Gary Wittenberg and Jacques S. Simon. I understand the
12 stipulation and the effect it will have on my Osteopathic Physician's and Surgeon's Certificate. I
13 enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and
14 intelligently, and agree to be bound by the Decision and Order of the Osteopathic Medical Board
15 of California.

16
17 DATED: 5/29/15 Lisa J Hunt
18 LISA J. HUNT, D.O.
Respondent

19 I have read and fully discussed with Respondent LISA J. HUNT, D.O. the terms and
20 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.
21 I approve its form and content.

22 DATED: _____
23 Gary Wittenberg
Attorney for Respondent

24
25 DATED: _____
26 Jacques S. Simon
27 Attorney for Respondent

28

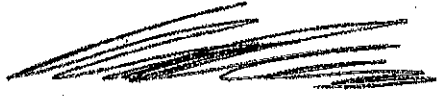
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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Osteopathic Medical Board of California.

Dated: 
May 29, 2015

Respectfully submitted,
KAMALA D. HARRIS
Attorney General of California
E. A. JONES III
Supervising Deputy Attorney General


WENDY WIDLUS
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Amended Accusation No. 00-2011-3237

1 KAMALA D. HARRIS
Attorney General of California
2 E. A. JONES, III
Supervising Deputy Attorney General
3 WENDY WIDLUS
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Attorneys for Complainant
8

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MAY 27 2015

**OSTEOPATHIC MEDICAL BOARD
OF CALIFORNIA**

9 **BEFORE THE**
OSTEOPATHIC MEDICAL BOARD OF CALIFORNIA
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 00-2011-3237

13 LISA J. HUNT, D.O.
1300 Mable Ave., #C
14 Modesto, California 95355

AMENDED ACCUSATION

15 Osteopathic Physician's and Surgeon's
16 Certificate No. 6338,

17
18
19 Respondent.

20 Complainant alleges:

21 **PARTIES**

22 1. Angelina M. Burton (Complainant) brings this Accusation solely in her official
23 capacity as the Executive Director of the Osteopathic Medical Board of California (Board),
24 Department of Consumer Affairs.

25 2. On or about July 23, 1992, the Board issued Osteopathic Physician's and Surgeon's
26 Certificate number 6338 to Linda J. Hunt, D.O. (Respondent). That license was in full force and
27 effect at all times relevant to the charges brought herein and will expire on April 30, 2016, unless
28 renewed.

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JURISDICTION

3. This Accusation is brought before the Board, under the authority of the following sections of the Osteopathic Act (Act)¹ and of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

4. Section 3600 of the Code states that the law governing licentiates of the Osteopathic Medical Board of California is found in the Osteopathic Act and in Chapter 5 of Division 2, relating to medicine.

5. Section 3600-2 of the Code states:

“The Osteopathic Medical Board of California shall enforce those portions of the Medical Practice Act identified as Article 12 (commencing with Section 2220), of Chapter 5 of Division 2 of the Business and Professions Code, as now existing or hereafter amended, as to persons who hold certificates subject to the jurisdiction of the Osteopathic Medical Board of California, however, persons who elect to practice using the term or suffix ‘M.D.’ as provided in Section 2275 of the Business and Professions Code, as now existing or hereafter amended, shall not be subject to this section, and the Medical Board of California shall enforce the provisions of the article as to persons who make the election. After making the election, each person so electing shall apply for renewal of his or her certificate to the Medical Board of California, and the Medical Board of California shall issue renewal certificates in the same manner as other renewal certificates are issued by it.”

6. Section 2 of the Act states:

“The Osteopathic Medical Board of California shall enforce those portions of the Medical Practice Act identified as Article 12 (commencing with Section 2220), of Chapter 5 of Division 2 of the Business and Professions Code, as now existing or hereafter amended, as to persons who hold certificates subject to the jurisdiction of the Osteopathic Medical Board of California. . .”

///

¹ The Osteopathic Act is an initiative measure that was approved by the electorate on November 7, 1922. It appears in West's annotated Business and Professions Code commencing at Section 3600, and in the appendix to the Deering's Business and Professions Code, following Section 25762.

1 7. Section 2001.1 of the Code states:

2 “Protection of the public shall be the highest priority for the Medical Board of California in
3 exercising its licensing, regulatory, and disciplinary functions. Whenever the protection of the
4 public is inconsistent with other interests sought to be promoted, the protection of the public shall
5 be paramount.”

6 8. Section 2227 of the Code states:

7 “(a) A licensee whose matter has been heard by an administrative law judge of the Medical
8 Quality Hearing Panel as designated in Section 11371 of the Government Code, or whose default
9 has been entered, and who is found guilty, or who has entered into a stipulation for disciplinary
10 action with the division, may, in accordance with the provisions of this chapter:

11 “(1) Have his or her license revoked upon order of the board.

12 “(2) Have his or her right to practice suspended for a period not to exceed one year upon
13 order of the board.

14 “(3) Be placed on probation and be required to pay the costs of probation monitoring upon
15 order of the board.

16 “(4) Be publicly reprimanded by the board.

17 “(5) Have any other action taken in relation to discipline as part of an order of probation, as
18 the board or an administrative law judge may deem proper.

19 “(b) Any matter heard pursuant to subdivision (a), except for warning letters, medical
20 review or advisory conferences, professional competency examinations, continuing education
21 activities, and cost reimbursement associated therewith that are agreed to with the board and
22 successfully completed by the licensee, or other matters made confidential or privileged by
23 existing law, is deemed public, and shall be made available to the public by the board pursuant to
24 Section 803.1.”

25 9. Section 2234 of the Code, as made applicable to the Board’s licensees by section
26 3600 of the Code, states, in pertinent part:

27 “The board shall take action against any licensee who is charged with unprofessional
28 conduct. In addition to other provisions of this article, unprofessional conduct includes, but is not

1 limited to, the following:

2 “ ...

3 “(b) Gross negligence.

4 “ ...”

5 10. Section 2266 of the Code states:

6 “The failure of a physician and surgeon to maintain adequate and accurate records relating
7 to the provision of services to their patients constitutes unprofessional conduct.”

8 **COSTS**

9 11. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
10 administrative law judge to direct a licentiate found to have committed a violation or violations of
11 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
12 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being
13 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
14 included in a stipulated settlement.

15 **FACTS**

16 12. Patient K² had her first appointment with Respondent on January 5, 2011, and
17 complained of adrenal fatigue, hormonal imbalance, depression, fainting and insomnia. In
18 addition, K reviewed her prior medical history, medication, and supplements with Respondent.
19 Per Respondent’s direction at that first visit, K had a T3 Free³ laboratory test performed. Those
20 T3 Free test results were 2.4 pg/ml; the normal range for this test being between 1.8 - 4.6 pg/ml.

21 13. K’s patient intake form listed Zolpidem⁴ as one of the medications she was currently
22 taking when Respondent began treating her. On January 19, 2011, Respondent’s medical records
23 document Respondent prescribed Zolpidem for K, but do not reflect any other information about
24 this prescription.

25 ² The names of the patient and certain other witnesses are abbreviated to protect their privacy rights. The
26 names will be provided to Respondent upon written request for discovery.

27 ³ Triiodothyronine (T3) is a thyroid hormone which plays an important role in the body’s control of
28 metabolism. A laboratory test is used to measure the amount of T3 in a person’s blood.

⁴ Zolpidem is a sedative/hypnotic used for moderate to severe insomnia with side effects which include
headache and dizziness. This medication is sold under the brand name Ambien.

1 14. Patient K had her second appointment with Respondent on January 31, 2011, where
2 Respondent's records show K's weight as "139 pounds clothed." At this visit, Respondent
3 diagnosed K with "Anxiety State Unspecified; Fatigue and Depression, Reactive." Respondent
4 prescribed Nature-Throid⁵ for K as follows: "1/4 grain to increase to 1/2 grain after 2 weeks if
5 tolerated." The manufacturer's recommended dosages for Nature-Throid are listed as 15 to 30
6 mg by mouth per day, with maintenance between 60 to 120 mg by mouth per day (conversion for
7 this dosage is 1 grain equals approximately 60 mg.) The principal adverse effect for Nature-
8 Throid is tachycardia.⁶

9 15. On January 19, 2011, Respondent prescribed Clonazepam⁷ for K, whose patient
10 intake form listed this as one of the medications she was taking when Respondent began treating
11 her. Respondent's records do not reflect any other information about this prescription.

12 16. In February, 2011, K told Respondent that after raising the Nature-Throid by 1/4 grain
13 (15 mg) she began to experience palpitations, anxiety, and a "general wound-up feeling."
14 Respondent decreased her dosage back to 1/4 grain. There is no notation of this reduction in
15 Respondent's medical records.

16 17. Respondent's medical records state that on March 15, 2011, K left a voice mail
17 message saying she had increased her thyroid, was feeling anxiety, insomnia, and her heart was
18 racing. Respondent's note then states "Spoke with the patient in detail. Signed DO Hunt, Lisa."
19 There is no other documentation of Respondent's conversation with K.

20 18. On March 25, 2011, K documented that Respondent started her on a prescription of
21 "... free T3, titrating up to 1 mg 2x daily." There is nothing in Respondent's medical records
22 which corroborate this prescription for K, or the reasons for writing this prescription.

23 19. K had her third appointment with Respondent on April, 19, 2011, where Respondent
24 performed the same physical examination done during K's second appointment with her.

25
26 ⁵ Nature-Throid is a hypoallergenic combination thyroxine (T4) and triiodothyronine (T3) hormone
replacement drug formulated from Thyroid USP using hypoallergenic inactive ingredients.

27 ⁶ Tachycardia is a heart rate of more than 100 beats per minute (BPM) in adults.

28 ⁷ Clonazepam is a benzodiazepine drug which has sedative and hypnotic properties used as an antianxiety
and an anticonvulsant.

1 Respondent's records note that K's weight was still 128 pounds. Respondent did not address the
2 18 lb. weight loss in her records for this visit, nor does she record K's Body Mass Index (BMI) to
3 evaluate K current physical condition relative to this weight loss.

4 Respondent's medication record states "Naturethroid [sic] at ½ grain, start T3 at 1 mg,
5 DHEA and Progesterone at 25 mgs for days 1-14 and 50 mgs for days 14-28." Respondent's
6 medical records also reflect that a laboratory test was ordered, but does not state the specific test.
7 Respondent's records note that on May 12, 2011, K's T3 Free test results were 2.6 pg/ml; the
8 normal range for this test is between 1.8 - 4.6 pg/ml.

9 20. On May 18, 2011, Respondent's records note a phone message from K as follows:
10 "I would like to know my lab results. Currently taking ½ grain and T3 1 mcg/jv [.]" This note
11 appears to be have been written by Respondent's assistant, JV. There is no other notation of this
12 medication dosage in Respondent's records.

13 There is another note written for this date by JV stating that she spoke to K who wanted JV
14 to call her pharmacy with a prescription for "1 grain nature-throid [sic] and 1 mcg am and noon."

15 21. On May 23, 2014, the pharmacy's records reflect the following prescription for K:
16 Nature-throi [sic] 65 mg #60. On May 26, 2011, the pharmacy's records reflect the following
17 prescription for K: T3- 0.1 GM, #60, refilled 31 days later on June 27, 2011. The June 27, 2011,
18 refill of this prescription suggests the medication was being taken twice a day, which is above the
19 recommended dosage. Respondent's records do not show that this error was either addressed or
20 corrected.

21 22. K had her third appointment with Respondent on June 21, 2011. Respondent's
22 records show that K's physical exam result and diagnoses for this visit are exactly the same as the
23 ones documented from her first appointment with Respondent.

24 Respondent's records state, "We reviewed her labs in detail. She notes a recent episode of
25 the flu in which she lost weight. She is doing better now but is still weak. Vitals collected
26 include blood pressure recorded at 110/70 and a weight of 111 pounds clothed." As such, K had
27 lost 17 pounds in eight (8) weeks, for a total of 28 pounds since her first appointment with
28 Respondent. Again, Respondent neither addressed the weight loss in her records, nor did she

1 record K's Body Mass Index (BMI) to evaluate K's current physical condition relative to K's
2 most recent weight loss.

3 Respondent's medicine record states, "Nature-throid 1 grain AM, T3 1 mg NOON."

4 23. On June 21, 2011, Respondent's records show a phone message prepared by JV
5 stating a prescription was "called in Ambien (brand for zolpidem) 5mg 1 po qd #30 //jv [.]"
6 There is no documentation in the record indicating if this prescription was filled. However, on
7 June 22, 2011, Respondent's records show another phone message from K asking to obtain
8 samples of Lunesta⁸ "to see if they work better." Respondent's records do not show K was
9 counseled on the medication's side effects.

10 24. On July 6, 2011 K went to a different physician, who determined her heart rate to be
11 160-170, and ordered urgent blood tests. On July 20, 2011, this physician stated these blood
12 results confirmed K had hyperthyroidism,⁹ which the physician attributed to the thyroid
13 medications K was taking.

14 25. Respondent's records show a phone message prepared by JV. According to the
15 message, JV phoned in a prescription for K for "Ambien 10 mg po qd #30 I//jv." On July 21,
16 2011, Respondent's records document a phone message as follows: "called in a rx request for
17 nature thyroid medicine shoppee [.]" On July 25, 2011, Respondent's records document a phone
18 message as follows: "called and left msg regarding access lab slip ready for her //jv[.]"

19 26. On July 26, 2011, the blood test results were reported as T3 free 3.0, reference range
20 1.8-4.6 pg/ml; T4 free 0.95, reference range 0.9-1.7 ng/ml; and TSH <0.005, reference range
21 0.27-4.2 uIU/ml.

22 27. On July 28, 2011, Respondent's assistant called K and said Respondent wanted K to
23 know her blood test results were normal so K should continue taking the Nature-Throid and T3.

24 ///

25 _____
26 ⁸ Lunesta is the brand name for eszopiclone, a nonbenzodiazepine hypnotic agent used to treat moderate to
severe insomnia.

27 ⁹ Hyperthyroidism refers to any condition in which there is too much thyroid hormone produced in the body.
28 Some of the symptoms of hyperthyroidism include heart racing, weight loss, nervousness, difficulty sleeping,
irritability, and anxiety.

1 **FIRST CAUSE FOR DISCIPLINE**

2 (Gross Negligence)

3 28. Respondent is subject to disciplinary action under section 2234, subdivision (b), of
4 the Code in that she committed acts or omissions involving gross negligence in the care and
5 treatment of patient K. The circumstances are as follows:

6 29. The facts and circumstances in paragraphs 11 through 27 are incorporated by
7 reference as if set forth in full herein.

8 30. The standard of care requires a physician to accurately diagnose and treat a patient.
9 The physician must order appropriate laboratory tests to determine the cause of the patient's
10 illness. A physician must render an accurate diagnosis in order to appropriately treat a patient and
11 must also recognize and correctly interpret key changes in the patient's symptoms. A physician
12 must respond appropriately to key changes in the patient's symptoms. Finally, a physician who is
13 treating a patient must recognize and act appropriately upon the receipt of abnormal laboratory
14 values.

15 31. In this case, Respondent ordered a single laboratory test from a spectrum of tests
16 which, if additional tests had been utilized, would have provided a complete analysis of K's
17 condition. Respondent failed to accurately interpret K's symptoms and the single blood test
18 result. Her inaccurate diagnosis resulted in a decision to treat K with a thyroid supplement
19 program which caused the patient to suffer symptoms of a different disease. After K began to
20 follow Respondent's thyroid hormone supplement program she exhibited, and complained of,
21 certain symptoms such as weight loss, fatigue, loss of energy, anxiety, insomnia and a racing
22 heart; these symptoms should have been significant to Respondent. Respondent failed to actively
23 monitor her patient's complaints with appropriate tests. She did not appear to comprehend that
24 K's symptoms were a result of her treatment decisions. Instead, Respondent maintained K on the
25 improper thyroid hormone supplement program, rather than ordering laboratory tests to determine
26 K's condition and properly adjusting K's medication regimen. Further, the July 26, 2011, blood
27 test results were significantly abnormal. The message Respondent subsequently sent to K to
28 continue the thyroid regimen she was on shows that Respondent neither recognized the

1 significance of K's blood test results nor acted appropriately when she informed her patient her
2 blood test results were normal and she should continue taking the medications Respondent
3 prescribed for her.

4 32. Respondent's care and treatment of K, as described above, is an extreme departure
5 from the standard of care.

6 **SECOND CAUSE FOR DISCIPLINE**

7 (Inadequate Record Keeping)

8 33. Respondent is subject to disciplinary action under Code section 2266, in that she
9 failed to maintain adequate and accurate records relating to the provision of medical services to
10 patient K. The facts and circumstances alleged above in the First Cause for Discipline are
11 incorporated herein as if fully set forth.

12 **PRAYER**

13 **WHEREFORE**, Complainant requests that a hearing be held on the matters herein alleged,
14 and that following the hearing, the Osteopathic Medical Board of California issue a decision:

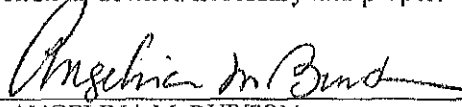
15 1. Revoking or suspending Osteopathic Physician's and Surgeon's Certificate Number
16 6338, issued to Lisa J. Hunt, D.O.

17 2. Ordering Lisa J. Hunt, D.O. to pay the Osteopathic Medical Board of California the
18 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
19 Professions Code section 125.3;

20 3. If placed on probation, ordering her to pay to the Osteopathic Medical Board of
21 California the costs of probation monitoring;

22 4. Taking such other and further action as deemed necessary and proper.

23 DATED: May 27, 2015

24 
ANGELINA M. BURTON
Executive Director
Osteopathic Medical Board of California
Department of Consumer Affairs
State of California
Complainant

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DECLARATION OF SERVICE BY MAIL

In the Matter of the Accusation Against:

**Lisa J. Hunt, D.O.
Case No: 00-2011-3237**

I, the undersigned, declare that I am over 18 years of age and not a party to the within cause; my business address is 1300 National Drive, Suite 150, Sacramento, CA 95834. I served a true copy of the attached:

DECISION AND ORDER
AND
STIPULATED SETTLEMENT AND DISCIPLINARY ORDER

by mail on each of the following, by placing it in an envelope (or envelopes) addressed (respectively) as follows:

NAME AND ADDRESS	CERT NO.
Lisa J. Hunt, D.O. 1300 Mable Ave #C Modesto, CA 95355	91 7199 9991 7034 8995 4856
Gary Wittenberg, Esq Baranov & Wittenberg, LLP 1901 Avenue of the Stars, Suite 1750 Los Angeles, CA 90067	91 7199 9991 7034 8995 4849

Each said envelope was then, on July 31, 2015 sealed and deposited in the United States mail at Sacramento, California, the county in which I am employed, with the postage thereon fully prepaid, and return receipt requested.

Executed on July 31, 2015 at Sacramento, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Steve Ly

Typed Name



Signature

cc: Wendy Widlus, Deputy Attorney General
Jacques S. Simon, Esq.