

BEFORE THE STATE MEDICAL BOARD OF OHIO

IN THE MATTER OF :  
:  
KAREN S. JONES, D.O. :

ENTRY OF ORDER

By letter dated June 12, 1991, the State Medical Board of Ohio notified Karen S. Jones, D.O., that it proposed to take action against her license to practice osteopathic medicine and surgery in the State of Ohio for the reasons set forth in that letter, which is attached hereto and fully incorporated herein by reference.

Notice was mailed by certified mail, return receipt requested, to Dr. Jones' last known address of record, that being 8017 Betty Louise Drive, Panama City, Florida, 32404. Said notice was returned to the State Medical Board of Ohio marked as being unclaimed.

In view of the fact that Dr. Jones' license to practice osteopathic medicine and surgery in Ohio lapsed by reason of her failure to renew on December 31, 1990, it is hereby ORDERED that the Board's action in this matter be and is hereby DISMISSED WITHOUT PREJUDICE to future action.

So ORDERED this 14<sup>th</sup> day of July, 1994.

Carla S. O'Day  
Carla S. O'Day, M.D., Secretary  
7/12/94  
Date

(SEAL)

Raymond J. Albert  
Raymond J. Albert, Supervising Member  
7/14/94  
Date



# STATE MEDICAL BOARD OF OHIO

77 South High Street, 17th Floor • Columbus, Ohio 43266-0315 • (614) 466-3934

June 12, 1991

Karen S. Jones, D.O.  
8017 Betty Louise Drive  
Panama City, FL 32404

Dear Doctor Jones:

In accordance with Chapter 119., Ohio Revised Code, you are hereby notified that the State Medical Board of Ohio intends to determine whether or not to limit, revoke, suspend, refuse to register or reinstate your certificate to practice osteopathic medicine and surgery, or to reprimand or place you on probation for one or more of the following reasons:

- (1) On or about April 20, 1990 your osteopathic medical license was suspended by the Florida Board of Osteopathic Medical Examiners based upon an Order of Default containing Findings of Fact and Conclusions of Law, a copy of which is attached hereto and incorporated herein.

Such acts, conduct, and/or omissions as alleged in paragraph (1) above, individually and/or collectively constitute "the limitation, revocation or suspension by another state of a license or certificate to practice issued by the proper licensing authority of that state, the refusal to license, register, or reinstate an applicant by that authority, or the imposition of probation by that authority, for an action that would also have been a violation of this chapter, except for nonpayment of fees," as that clause is used in Section 4731.22(B)(22), Ohio Revised Code, to wit: 4731.22(B)(5) and (B)(8), Ohio Revised Code.

- (2) On or about January 3, 1987 you completed your application for biennial license renewal to practice as a Doctor of Osteopathic Medicine for the 1987-1988 biennium. On that application you answered "no" to question number four (4) which asks, "at any time since the last renewal of your certificate have you had any hospital privileges suspended or revoked?"

*Mailed 6/17/91*

June 17, 1991

Karen S. Jones, D.O.  
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In fact, on or about August 22, 1986 your clinical privileges at Lyster U.S. Army Community Hospital, in Fort Rucker, Alabama were revoked.

Such acts, conduct, and/or omissions as alleged in paragraph (2) above, individually and/or collectively, constitute "fraud, misrepresentation, or deception in applying for or securing any license or certificate issued by the board," as that clause is used in Section 4731.22(A), Ohio Revised Code.

Further, such acts, conduct, and/or omissions as alleged in paragraph (2) above, individually and/or collectively, constitute "publishing a false, fraudulent, deceptive, or misleading statement," as that clause is used in Section 4731.22(B)(5), Ohio Revised Code.

Further, such acts, conduct, and/or omissions as alleged in paragraph (2) above, individually and/or collectively, constitute "(t)he obtaining of, or attempting to obtain money or anything of value by fraudulent misrepresentations in the course of practice," as that clause is used in Section 4731.22(B)(8), Ohio Revised Code.

Pursuant to Chapter 119., Ohio Revised Code, you are hereby advised that you are entitled to a hearing in this matter. If you wish to request such hearing, the request must be made in writing and must be received in the offices of the State Medical Board within thirty (30) days of the time of mailing of this notice.

You are further advised that you are entitled to appear at such hearing in person, or by your attorney, or by such other representative as is permitted to practice before this agency, or you may present your position, arguments, or contentions in writing, and that at the hearing you may present evidence and examine witnesses appearing for or against you.

In the event that there is no request for such hearing received within thirty (30) days of the time of mailing of this notice, the State Medical Board may, in your absence and upon consideration of this matter, determine whether or not to limit, revoke, suspend, refuse to register or reinstate your certificate to practice osteopathic medicine and surgery or to reprimand or place you on probation.

Karen S. Jones, D.O.  
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June 17, 1991

Copies of the applicable sections are enclosed for your information.

Very truly yours,

*Henry G. Cramblett, M.D.*

Henry G. Cramblett, M.D.

Secretary

HGC:jmb

Enclosures:

CERTIFIED MAIL #P 055 328 899  
RETURN RECEIPT REQUESTED

PL-10

FILED

Department of Professional Regulation  
AGENCY CLERK

BEFORE THE BOARD OF OSTEOPATHIC  
MEDICAL EXAMINERS

*Paul Cope*

CLERK \_\_\_\_\_

DATE 4-30-90

DEPARTMENT OF PROFESSIONAL  
REGULATION,

Petitioner,

vs.

CASE NO. 0087491

KAREN S. JONES, D.O.

Respondent.

ORDER OF DEFAULT

This matter came before the Board of Osteopathic Medical Examiners pursuant to Section 120.57(2), Florida Statutes, on March 24, 1990, in Miami Beach, Florida on Petitioner's Motion for Default. Petitioner was represented by Stephanie A. Daniel, Attorney at Law; Respondent was not present and was not represented.

FINDINGS OF FACT

1. Respondent is a licensed osteopathic physician in Florida, holding license OS 0003044.
2. Petitioner filed an Administrative Complaint against the licensee in which the Department sought disciplinary action against her license. A copy of the Administrative Complaint is attached to and made a part of this order.
3. Petitioner served thy Administrative Complaint on Respondent by certified mail. Respondent has not responded to the Administrative Complaint.

4. Petitioner abandoned paragraphs 3, 4, and 5 of the Administrative Complaint and Count One. The Board adopts as its findings of fact paragraphs 1, 2, 8 (as amended), and 9-15 of the Administrative Complaint. A further review of the investigative file shows that the Petitioner has made a prima facie showing of violation of Chapter 459, Florida Statutes.

CONCLUSIONS OF LAW

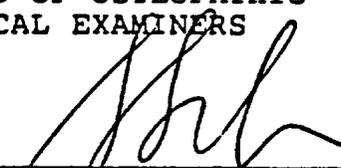
Based on the Findings of Fact, the Board concludes that Respondent is in default. The Board further finds that the licensee is in violation of Section 459.015(1)(n), Florida Statutes.

It is hereby ordered and adjudged that the osteopathic medical license of Karen S. Jones is suspended until such time as she personally appears before the Board to show good cause why she did not respond to the Administrative Complaint. If good cause is shown, the suspension will be lifted and the default set aside. If no good cause is shown, the Board will consider what further penalties, if any, should be imposed.

This order takes effect upon filing with the Clerk of the Department of Professional Regulation.

Done and Ordered this 17<sup>th</sup> day of April,  
1990.

BOARD OF OSTEOPATHIC  
MEDICAL EXAMINERS

  
\_\_\_\_\_  
Sandra L. Schweanmer, D.O.  
Vice Chairman

NOTICE OF RIGHT TO JUDICIAL REVIEW

A PARTY WHO IS ADVERSELY AFFECTED BY THIS FINAL ORDER IS ENTITLED TO JUDICIAL REVIEW PURSUANT TO SECTION 120.68, FLORIDA STATUTES. REVIEW PROCEEDINGS ARE GOVERNED BY THE FLORIDA RULES OF APPELLATE PROCEDURE. SUCH PROCEEDINGS ARE COMMENCED BY FILING ONE COPY OF A NOTICE OF APPEAL WITH THE AGENCY CLERK OF THE DEPARTMENT OF PROFESSIONAL REGULATION AND A SECOND COPY, ACCOMPANIED BY FILING FEES PRESCRIBED BY LAW, WITH THE DISTRICT COURT OF APPEAL, FIRST DISTRICT, OR WITH THE DISTRICT COURT OF APPEAL IN THE APPELLATE DISTRICT WHERE THE PARTY RESIDES. THE NOTICE OF APPEAL MUST BE FILED WITHIN THIRTY (30) DAYS OF RENDITION OF THE ORDER TO BE REVIEWED.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing order has been provided by certified mail to Karen S. Jones, 8017 Betty Louise Drive, Panama City, Florida 32404 and by interoffice delviery to Stephanie A. Daniel, Attorney at Law, Department of Professional Regulation, 1940 North Monroe Street, Tallahassee, FL 32399-0773 this 20<sup>th</sup> day of April, 1990.

Adriane G. Trustey

STATE OF FLORIDA  
DEPARTMENT OF PROFESSIONAL REGULATION  
BOARD OF OSTEOPATHIC MEDICAL EXAMINERS

DEPARTMENT OF PROFESSIONAL  
REGULATION,

Petitioner,

CASE NO. 0087491

v.

KAREN S. JONES, D.O.,

Respondent.

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ADMINISTRATIVE COMPLAINT

COMES NOW, the Petitioner, Department of Professional Regulation, hereinafter referred to as "Petitioner", and files this Administrative Complaint before the Board of Osteopathic Medical Examiners against Karen S. Jones, D.O., hereinafter referred to as "Respondent", and alleges:

1. Petitioner is the state agency charged with regulating the practice of osteopathic medicine pursuant to Section 20.30, Florida Statutes, Chapter 455, Florida Statutes, and Chapter 459, Florida Statutes.

2. Respondent is and has been at all times material hereto a licensed osteopathic physician in the State of Florida, having been issued license number OS 0003044. Respondent's last known address is 8017 Betty Louise Drive, Panama City, Florida 32404.

3. On or about August 22, 1986, Respondent's authority to practice osteopathic medicine in the United States Department of the Army was revoked.

4. The United States Department of the Army is an agency of the United States government. The United States Department of the Army, by conferring clinical privileges on an osteopathic physician, confers authority to practice osteopathic medicine on individuals. The United States Department of the Army removes that authority by "decredentialling" those individuals or revoking their clinical privileges. Therefore, the United States Department of the Army is a licensing authority of the United States.

5. The action taken by the United States Department of the Army was based on findings of improper conduct with patients and suspected alcohol abuse.

COUNT ONE

6. Petitioner realleges paragraphs one (1) through five (5) above as if fully set forth herein this Count One.

7. Based on the foregoing, Respondent violated Section 459.015(1)(b), Florida Statutes, by having a license (or the authority) to practice osteopathic medicine revoked, suspended or otherwise acted against by the licensing authority of any state, territory or country.

COUNT TWO

8. Petitioner realleges paragraphs one (1) through five (5) above as if fully set forth herein this Count Two.

9. On or about November 1, 1986, Respondent submitted an application for hospital staff privileges at Gulf Pines Hospital in Port St. Joe, Florida.

10. The application included the following questions, to which Respondent answered "No":

- a. Has your license to practice medicine in any jurisdiction ever been limited, suspended or revoked?
- b. Have your privileges at any hospital ever been suspended, diminished, revoked or not renewed?
- c. Have you ever been denied membership or renewal thereof, or been subject to disciplinary action in any medical organization?

11. By answering "no" to the above-mentioned questions, Respondent made false, deceptive or misleading statements.

12. As part of the disciplinary process mentioned in paragraph three (3) above, Respondent's clinical privileges at Lyster U.S. Army Community Hospital, in Fort Rucker, Alabama, were revoked.

13. By completing and submitting the application for hospital staff privileges at Gulf Pines Hospital as described in paragraphs nine (9) and ten (10) above, Respondent sought the authority to practice medicine at that facility.

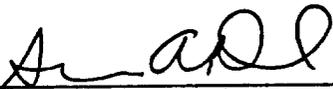
14. The false, deceptive or misleading statements made by Respondent were in the practice of medicine and constituted a trick or scheme in the practice of medicine.

15. Based on the foregoing, Respondent violated Section 459.015(1)(n), Florida Statutes, by making deceptive, untrue or fraudulent representations in the practice of osteopathic medicine or employing a trick or scheme in the practice of osteopathic medicine.

WHEREFORE, Petitioner respectfully requests the Board of Osteopathic Medical Examiners enter an Order imposing one or more of the following penalties: revocation or suspension of the Respondent's license, restriction of the Respondent's practice, imposition of an administrative fine, issuance of a reprimand, placement of the Respondent on probation, and/or any other relief that the Board deems appropriate.

SIGNED this 17<sup>th</sup> day of November, 1989.

Larry Gonzalez, Secretary

  
By: Stephanie A. Daniel  
Chief Medical Attorney

COUNSEL FOR DEPARTMENT:

Stephanie A. Daniel  
Chief Attorney  
Dept. of Professional Regulation  
1940 N. Monroe Street, Suite 60  
Tallahassee, Florida 32399-0792  
(904) 487-9676

**FILED**

Department of Professional Regulation  
AGENCY CLERK

  
CLERK J. W. Cope

DATE November 20, 1989