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AUG 15 2014

KS State Board of Healing Arts

BEFORE THE BOARD OF HEALING ARTS
OF THE STATE OF KANSAS

In the Matter of	)	
	)	KSBHA Docket No.: 14-HA00103
JOSEPH P. CLARK, P.A.	)	14-HA00123
	)	
Kansas License No. 15-00990	)	OAH Docket No.: 14-HA0013
		14-HA0014

CONSENT ORDER

COMES NOW, the Kansas State Board of Healing Arts, ("Board"), by and through Seth K. Brackman, Associate Litigation Counsel ("Petitioner"), and Joseph P. Clark, P.A. ("Licensee"), by and through his counsel, Carol Ruth Bonebrake and Ivery A. Goldstein of Simpson, Logback, Lynch & Norris, P.A., and move the Board for approval of a Consent Order affecting Licensee's license to practice as a physician assistant in the State of Kansas. The Parties stipulate and agree to the following:

1. Licensee's last known mailing address to the Board is: Confidential Lawrence, Kansas 66049.
2. Licensee is or has been entitled to engage in the practice as a physician assistant in the State of Kansas, having been issued License No. 15-00990 on or about December 11, 2004.
3. Licensee currently holds an inactive license to practice as a physician assistant in Kansas and last renewed such license on or about December 12, 2013. Licensee's original request for a status change from active to inactive was granted on May 16, 2012.

4. On or about October 31, 2013, Licensee submitted an Application for Change of Designation/Type from inactive to active status, and such application is pending. Licensee's license has been inactive for more than two (2) years, and he has not actively practiced as a physician assistant since February 16, 2012.
5. On or about March 14, 2014, the Board filed a Response in Opposition to Application for Change of Designation/Type of License to Practice as a Physician Assistant from Inactive to Active ("Response in Opposition"). The Board filed an Amended Response in Opposition on or about April 7, 2014. These filings were docketed as KSBHA Docket No. 14-HA00103 and scheduled for a formal hearing with the Office of Administrative Hearings ("OAH") in OAH Docket No. 14-HA0013.
6. On or about April 1, 2014, the Board filed a Petition based upon KSBHA Investigation 12-00494. The Petition docketed as KSBHA Docket No. 14-HA00123 and scheduled for a formal hearing with OAH in OAH Docket No. 14-HA0014.
7. On or about April 17, 2014, an Order to Convert to Formal Hearing, Order to Consolidate Cases, Order Appointing Presiding Officer, and Preliminary Discovery Order was filed with the Board consolidating KSBHA Docket No. 14-HA00103/OAH Docket No. 14-HA0013 and KSBHA 14-HA00123/OAH Docket No. 14-HA0014. This Consent Order resolves both cases.
8. The Board is the sole and exclusive administrative agency in the State of Kansas authorized to regulate the practice of the healing arts, specifically the practice as a physician assistant. K.S.A. 65-28a01 *et seq*. and K.S.A.65-28a02.
9. This Consent Order and the filing of such document are in accordance with applicable law and the Board has jurisdiction to enter into the Consent Order as provided by

K.S.A. 77-505 and 65-28a12. Upon approval, these stipulations shall constitute the findings of the Board, and this Consent Order shall constitute the Board's Final Order.

10. The Kansas Physician Assistant Licensure Act is constitutional on its face and as applied in the case. Licensee agrees that, in considering this matter, the Board is not acting beyond its jurisdiction as provided by law.

11. A protective order is hereby entered to protect all confidential information pursuant to 42 CFR Part II, K.S.A. 65-2836(i), and K.S.A. 65-4925.

12. Licensee voluntarily and knowingly waives his right to a hearing. Licensee voluntarily and knowingly waives his right to present a defense by oral testimony and documentary evidence, to submit rebuttal evidence, and to conduct cross-examination of witnesses. Licensee voluntarily and knowingly agrees to waive all substantive and procedural motions and defenses that could be raised if an administrative hearing were held.

13. The terms and conditions of the Consent Order are entered into between the undersigned parties and are submitted for the purpose of allowing these terms and conditions to become an Order of the Board. This Consent Order shall not be binding on the Board until an authorized signature is affixed at the end of this document. Licensee specifically acknowledges that counsel for the Board is not authorized to sign this Consent Order on behalf of the Board.

14. The Board has received information and investigated the same, and has reason to believe that there may be grounds pursuant to K.S.A. 65-28a05, to take action with

respect to Licensee's license under the Kansas Physician Assistant Licensure Act, K.S.A. 65-28a01, *et seq.*

15. All pending investigation materials in KSBHA Investigation numbers 12-00494 and 13-00341 regarding Licensee were fully reviewed and considered by the Board members who serve on the Board's Disciplinary Panel No. 28. Disciplinary Panel No. 28 authorized and directed Board counsel to seek settlement of this matter with the provisions contained in this Consent Order.

16. Licensee does not admit nor deny the allegations contained in this Consent Order. Licensee acknowledges that if formal hearing proceedings were conducted and Licensee presented no exhibits, witnesses, or other evidence, the Board has sufficient evidence to prove that Licensee violated the Kansas Physician Assistant Licensure Act with respect to the allegations contained in the Petition and Response in Opposition to Application for Change of Designation/Type of License to Practice as a Physician Assistant from Inactive to Active. Licensee further waives his right to dispute or otherwise contest these allegations in any future proceeding before this Board.

17. This Consent Order incorporates, herein by reference, the facts as stated in the Petition that was filed on April 1, 2014, the Response in Opposition to Application for Change of Designation/Type of License to Practice as a Physician Assistant from Inactive to Active ("Response in Opposition") filed on March 14, 2014, and the Amended Response in Opposition filed on April 7, 2014. In addition, the following facts are presented:

a. Confidential

b. Confidential Licensee was terminated from his employment at Stormont Vail in Topeka, Kansas, on or about March 1, 2012.

c. Further, on or about March 12, 2012, Bradley Woods, M.D., Licensee's supervising physician, terminated his role as the responsible physician overseeing Licensee. In support of the Notice of Termination of Supervision of a Physician Assistant provided to the Board via facsimile, Dr. Woods wrote:

> "Pursuant to KAR 100-28a-10 I am terminating my role as the responsible physician for [Licensee] because in my judgment his conduct constituted grounds for disciplinary action under the physician assistant licensure act and its regulations, particularly KAR 100-28a-8(g)(3)-'practicing as a physician assistant without reasonable skill and safety to patients because of any of the following: (3) excessive use of alcohol, drugs, controlled substances, chemicals or any other type of material' and/or (i) 'Prescribing, selling, administering, distributing, or giving a controlled substance to any person (himself) for other than a medically accepted or lawful purpose.'"

d. Confidential

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Confidential

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18. Licensee acknowledges that the Board has sufficient evidence to prove that Licensee has violated the Kansas Physician Assistant Licensure Act with respect to the above facts as follows:

a. Licensee violated K.S.A. 65-28a05(a), as further defined by K.A.R. 100-28a-8(e), for willfully or repeatedly violating the physician assistant licensure act, the pharmacy act of the State of Kansas, or the uniform controlled substances act, or any regulations adopted pursuant to these acts.

b. Licensee further violated K.S.A. 65-28a05(a), as further defined by K.A.R. 100-28a-8(g)(1-4), for practicing as a physician assistant without reasonable skill and safety to patients because of illness, alcoholism, excessive use of alcohol, drugs, controlled substances, chemicals, or any other type of material, or any mental or physical condition.

c. Licensee violated K.S.A. 65-28a05(a), as further defined by K.A.R. 100-28a-8(i), for prescribing, dispensing, administering, distributing, or giving a controlled substance to any person for other than a medically accepted or lawful purpose.

d. Licensee violated K.S.A. 65-28a05(a), as further defined by K.A.R. 100-28a-8(j), for prescribing, dispensing, administering, distributing, a prescription drug or substance, including a controlled substance, in an excessive, improper, or inappropriate manner or quantity, or not in the course of the licensee's professional practice.

e. Licensee violated K.S.A. 65-28a05(a), as further defined by K.A.R. 100-28a-8(r), in that licensee has committed conduct likely to deceive, defraud or harm the public.

f. Licensee violated K.S.A. 65-28a05(a), as further defined by K.A.R. 100-28a-8(u), for failure to keep written medical records that accurately describe the services rendered to the patient.

g. Licensee violated K.S.A. 65-28a05(a), as further defined by K.A.R. 100-28a-8(v), for using any false, fraudulent, or deceptive statement in any document connected with the practice of the healing arts, including the intentional falsifying or fraudulent altering of a patient or medical care facility record.

h. Licensee further violated K.S.A. 65-28a05(c), as further defined by K.A.R. 100-28a-7(a), for one or more instances involving failure to adhere to the applicable standard of care to a degree that constitutes gross negligence, as determined by the board.

i. Licensee further violated K.S.A. 65-28a05(c), as further defined by K.A.R. 100-28a-7(b), for repeated instances involving failure to adhere to the applicable standard of care to a degree that constitutes ordinary negligence, as determined by the board.

j. Licensee further violated K.S.A. 65-28a05(c), as further defined by K.A.R. 100-28a-7(c), for a pattern of practice or other behavior that demonstrates a manifest incapacity or incompetence to perform professional services as a physician assistant.

k. Licensee further violated K.S.A. 65-28a05(g) for exceeding or acting outside the scope of authority given to Licensee by his supervising physician or by the Physician Assistant Licensure Act.

19. Licensee further waives his right to dispute or otherwise contest the allegations contained in the above paragraphs in any further proceeding before this Board.

20. Pursuant to K.S.A. 65-28a05 the Board has grounds to deny, revoke, suspend, limit, and/or censure Licensee's license.

21. According to K.S.A.77-505, the Board has authority to enter into this Consent Order without the necessity of proceeding to a formal

22. Licensee further understands and agrees that if the Board finds, after due written notice and an opportunity for a hearing, that Licensee has failed to comply with any of the terms of this Consent Order, the Board may immediately impose any sanction provided for by law, including but not limited to suspension or revocation of Licensee 's license to practice as a physician assistant in the State of Kansas. Licensee hereby expressly understands and agrees that, at any such hearing, the sole issue shall be whether or not Licensee has failed to comply with any of the terms or conditions set forth in this Consent Order. The Board acknowledges that at any such hearing, Licensee retains the right to confront and examine all witnesses, present evidence, testify on his own behalf, contest the allegations, present oral argument, appeal to the courts, and all other rights set forth in the Kansas Administrative Procedures Act, K.S.A. 77-501 *et seq.*, and the Kansas Physician Assistant Licensure Act, K.S.A. 65-28a01 *et seq.*

23. Nothing in this Consent Order shall be construed to deny the Board jurisdiction to investigate alleged violations of the Kansas Physician Assistant Licensure Act, or to investigate complaints received under the Risk Management Law, K.S.A. 65-4921 *et seq.*, that are known or unknown and are not covered under this Consent Order, or to initiate formal proceedings based upon known or unknown allegations of violations of the Kansas Physician Assistant Licensure Act.

24. Licensee hereby releases the Board, its individual members (in their official and personal capacity), attorneys, employees and agents, hereinafter collectively referred to as "Releasees", from any and all claims, including but not limited to those alleged damages, actions, liabilities, both administrative and civil, including the Kansas Judicial Review Act, K.S.A. 77-601 *et seq.* arising out of the investigation and acts leading to the execution of this Consent Order. This release shall forever discharge the Releasees of any and all claims or demands of every kind and nature that Licensee has claimed to have had at the time of this release or might have had, either known or unknown, suspected or unsuspected, and Licensee shall not commence to prosecute, cause or permit to be prosecuted, any action or proceeding of any description against the Releasees.

25. Licensee further understands and agrees that upon signature by Licensee, this document shall be deemed a public record and shall be reported to any entities authorized to receive disclosure of the Consent Order.

26. This Consent Order, when signed by both parties, constitutes the entire agreement between the parties and may only be modified or amended by a subsequent document executed in the same manner by the parties.

27. Licensee agrees that all information maintained by the Board pertaining to the nature and result of any complaint and/or investigation may be fully disclosed to and considered by the Board in conjunction with the presentation of any offer of settlement, even if Licensee is not present. Licensee further acknowledges that the Board may conduct further inquiry as it deems necessary before the complete or partial acceptance or rejection of any offer of settlement.
28. Licensee, by signature to this document, waives any objection to the participation of the Board members, including the Disciplinary Panel and General Counsel, in the consideration of this offer of settlement and agrees not to seek the disqualification or recusal of any Board member or General Counsel in any future proceedings on the basis that the Board member or General Counsel has received investigative information from any source which otherwise may not be admissible or admitted as evidence.
29. Licensee acknowledges that he has read this Consent Order and fully understands the contents.
30. Licensee acknowledges that this Consent Order has been entered into freely and voluntarily.
31. All correspondence or communication between Licensee and the Board relating to the Consent Order shall be by certified mail addressed to:

    Kansas State Board of Healing Arts
    Attn: Compliance Coordinator
    800 SW Jackson, Lower Level-Suite A
    Topeka, Kansas 66612

32. Licensee shall obey all federal, state and local laws and rules governing the practice as a physician assistant in the State of Kansas that may be in place at the time of execution of the Consent Order or may become effective subsequent to the execution of this document.

33. Upon execution of this Consent Order by affixing a Board authorized signature below, the provisions of this Consent Order shall become an Order under K.S.A. 65-28a12. This Consent Order shall constitute the Board's Order when filed with the office of the Executive Director for the Board and no further Order is required.

34. This Consent Order constitutes public disciplinary action.

35. The Board may consider all aspects of this Consent Order in any future matter regarding Licensee.

36. In lieu of conducting a formal proceeding, Licensee, by signature affixed to this Consent Order, hereby voluntarily agrees to the following disciplinary action on his license to engage in practice as a physician assistant:

SUSPENSION

37. Licensee's license to practice as a physician assistant in the State of Kansas shall be suspended for a period no less than three (3) years. Such suspension will be effective upon approval of this Consent Order with the Board.

38. After serving all or part of the suspension period, Licensee agrees to successfully complete no less than two (2) years' probation pursuant to the conditions outlined below.

39. Licensee may request a stay of the suspension or termination of the suspension as follows:

a. A request of termination of the suspension may only be requested after serving at least three (3) years' suspension. If granted, Licensee must then successfully complete no less than two (2) years of probation pursuant to the conditions outlined below; OR

b. A request to stay any portion of the suspension period may not be made until Licensee serves at least six (6) months of the suspension. If a stay of any portion of the suspension is granted, Licensee must then successfully complete no less than two (2) years of probation pursuant to the conditions outlined below. Licensee may file his application to stay any portion of the suspension and for reinstatement with the Board prior serving six (6) months suspension, but Licensee shall serve at least six (6) months suspension prior to the stay of any remaining portion of the suspension period.

40. Licensee agrees that the burden of proof by clear and convincing evidence shall be on Licensee to show sufficient rehabilitation to justify lifting the suspension or a stay of the suspension of his license to practice as a physician assistant. Further, Licensee's request will be governed by *Vakas v. The Kansas Board of Healing Arts*, 248 Kan. 589 (Kan. 1991), and all applicable statutes, law, rules and regulations regarding qualifications for licensure and reinstatement. If the Board determines Licensee's suspension of his license to practice as a physician assistant should not be lifted, Licensee shall not be eligible to reapply for lifting or a stay of the suspension for six (6) months from the effective date of the denial of all or part of any such request.

41. Licensee agrees that a request to stay the suspension of his license, terminate the suspension of his license, and terminate the probation of his license shall be in writing and addressed to:

    Kansas State Board of Healing Arts
    Attn: Compliance Coordinator
    800 SW Jackson, Lower Level-Suite A
    Topeka, Kansas 66612

42. All proceedings conducted on a request for termination of the suspension shall be in accordance with the provisions of the Kansas Administrative Procedure Act, K.S.A. 77-501, *et. seq.* and shall be reviewable in accordance with the Kansas Judicial Review Act, K.S.A. 77-601, *et. seq.*

PROBATION: CONTROLLED SUBSTANCE PRESCRIBING LIMITATION

43. Licensee is prohibited from ordering, prescribing, dispensing, distributing and/or administering any controlled substance in Schedules II, III, IV, and V of the Controlled Substance Act for a period no less than one (1) year, effective upon the lifting or a stay of his suspension to practice as a physician assistant in the State of Kansas.

44. Licensee may request the Board lift this prohibition from ordering, prescribing, dispensing, distributing and/or administering any controlled substance in Schedules II, III, IV, and V of the Controlled Substance Act after the expiration of one (1) year from the lifting or a stay of his suspension to practice as a physician assistant in the State of Kansas. The burden of proof by clear and convincing evidence shall be on Licensee to show sufficient rehabilitation to justify reinstatement of his controlled substance prescribing privileges. If the Board determines Licensee's controlled

substance prescribing privileges should not be reinstated, Licensee shall not be eligible to request reinstatement of such privileges for six (6) months from the effective date of the denial of all or part of any such request.

45. Licensee agrees that the Board may, at its discretion throughout the monitoring of this provision, request Confidential reports to ensure Licensee's compliance with the above provision.

46. Licensee agrees to immediately surrender his license if he fails to comply with this aforementioned limitation of ordering, prescribing, dispensing, distributing and/or administering any controlled substance in Schedules II, III, IV, and V of the Controlled Substance Act in any manner.

47. All proceedings conducted on this limitation shall be in accordance with the provisions of the Kansas Administrative Procedure Act and shall be reviewable in accordance with the Kansas Judicial Review Act.

48. Such application for reinstatement of his controlled substance prescribing privileges shall be made in writing and addressed to:

    Kansas State Board of Healing Arts
    Attn: Compliance Coordinator
    800 SW Jackson, Lower Level-Ste. A
    Topeka, Kansas 66612

PROBATION: PHYSICIAN'S CO-SIGNATURE REQUIRED LIMITATION

49. Licensee agrees that upon reinstatement of his controlled substances prescribing privileges, Licensee shall obtain his Responsible Physician's signature per his Drug Prescription Protocol filed with the Board, or other Board approved Kansas-licensed physician's signature, as a co-signature on each prescription Licensee writes to ensure

proper oversight of Licensee's determination to order, prescribe, dispense, distribute and/or administer any controlled substance in Schedules II, III, IV, and V of the Controlled Substance Act. Such probation limitation shall be for a period no less than one (1) year from the effective reinstatement date of his controlled substances prescribing privileges.

50. Licensee may request the Board lift this physician co-signature limitation after the expiration of one (1) year. The burden of proof by clear and convincing evidence shall be on Licensee to show sufficient rehabilitation to justify reinstatement of his controlled substances prescribing privileges. If the Board determines Licensee's physician co-signature limitation should not be lifted, Licensee shall not be eligible to request the modification of such requirement for six (6) months from the effective date of the denial of all or part of any such request.

51. During this physician co-signature limitation

    a. Licensee shall not order, prescribe, dispense, distribute and/or administer the aforementioned controlled substances to any family member.

    b. Further, Licensee shall not order, prescribe, dispense, distribute and/or administer the aforementioned controlled substances to any friend without an appropriate PA/Patient relationship.

52. Licensee agrees that the Board, or a Board's designee, may at its discretion throughout the monitoring of this provision, request random patient charts for review, to ensure Licensee's compliance with the above provision.

53. Licensee agrees that the Board may, at its discretion throughout the monitoring of this provision, request Confidential reports to ensure Licensee's compliance with the above provision.

54. Licensee agrees to immediately surrender his license if he fails to comply with this aforementioned limitation in any manner.

55. All proceedings conducted on this limitation shall be in accordance with the provisions of the Kansas Administrative Procedure Act and shall be reviewable in accordance with the Kansas Judicial Review Act.

56. Such application for the lifting of the physician co-signature requirement shall be made in writing and addressed to:

Kansas State Board of Healing Arts
Attn: Compliance Coordinator
800 SW Jackson, Lower Level-Ste. A
Topeka, Kansas 66612

MONITORING

57. Confidential

Confidential

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64. Confidential

65. Licensee will furnish a copy of this Consent Order to each and every state in which he holds licensure or applies for licensure and to an appropriate work site supervisor or personnel Confidential

66. Licensee shall immediately notify the Board or its designee of any citation, arrest or charge filed against him or of any conviction for any traffic or criminal offenses.

67. Licensee shall immediately notify the Board or its designee of any complaint filed, or investigation opened, by the proper licensing authority of another state, territory, District of Columbia, or other country, or by a peer review body, a health care facility, a professional association or society, or by a governmental agency.

68. Licensee shall at all times keep Board staff informed of all his current practice locations, addresses and telephone numbers. Licensee shall provide the above information in writing to the Board within ten (10) days of any such change.

69. The above Confidential provisions are not self-terminating. After a period of no less than five (5) years from the approval of this Consent Order, Licensee may request modification or termination of the monitoring provisions.

70. For any period of time that Licensee is not actively practicing as a physician assistant in Kansas, the monitoring and probation provisions will remain in effect but will be tolled and not counted towards reducing the five (5) year timeframe.

71. Licensee agrees that a request to modify or terminate the above MAP provisions shall be in writing and addressed to:

Kansas State Board of Healing Arts
Attn: Compliance Coordinator
800 SW Jackson, Lower Level-Ste. A
Topeka, Kansas 66612

PROBATION: EDUCATION

72. As a term of **Probation**, Licensee shall attend and successfully complete a competence assessment and educational intervention program assessment for physician assistants provided by the Center for Personalized Education for Physicians ("CPEP").

73. Within ten (10) days of the approval of this Consent Order, Licensee shall contact CPEP located at 7351 Lowry Boulevard, Suite 100, Denver, Colorado 80230 - Phone: 303-577-3232 - Fax: 303-577-3241 to enroll in the aforementioned program. Licensee shall forward proof of enrollment in the above-mentioned course to the Compliance Coordinator immediately thereafter.

74. Licensee shall complete this course before December 31, 2014. Licensee shall provide proof of completion to the Compliance Coordinator within thirty (30) days of attending the program, but no later than January 30, 2015.

75. These hours shall be in addition to those hours required for renewal of licensure.

76. All foreseen and unforeseen expenses to complete the aforementioned program including travel, lodging, program fee, meals, etc. shall be at Licensee's own expense.

77. Upon his return to practice following his suspension, Licensee shall follow any and all recommendations made by CPEP.

BOARD COSTS

78. Licensee is hereby ordered to pay the Board's incurred COSTS in conducting these proceedings under the Kansas Administrative Procedure Act in the amount that is put forth by the Board in a Statement of Costs. These costs shall be paid in full prior to the Board's consideration to reinstate Licensee's license to practice as a physician assistant in the State of Kansas.

79. Licensee shall make all payments, which shall be in the form of cashier's check or money order, to the "Kansas State Board of Healing Arts" and send all payments to the attention of:

Kansas State Board of Healing Arts
Attn: Compliance Coordinator
800 SW Jackson, Lower Level-Suite A
Topeka, Kansas 66612

TIMEFRAME

80. The above monitoring and probation provisions are not self-terminating. Except as provided for above:

    a. After a period of no less than two (2) years, Licensee may request modification or termination of the probation provisions;

    b. After a period of no less than five (5) years, Licensee may request modification or termination of the monitoring provisions.

81. For any period of time that Licensee is not actively practicing as a physician assistant in Kansas, the monitoring and probation provisions will remain in effect but will be tolled and not counted towards reducing the aforementioned timeframes.

IT IS THEREFORE ORDERED that the Consent Order and agreement of the parties contained herein is adopted by the Board as findings of fact, conclusions of law, and as a Final Order of the Board.

IT IS SO ORDERED on this 15 day of Aug, 2014.

FOR THE KANSAS STATE BOARD OF HEALING ARTS:

Kathleen Selzler Lippert
Executive Director

8/15/14
Date

Joseph P. Clark, P.A.
Licensee

July 22 2014
Date

PREPARED AND APPROVED BY:

Seth K. Brackman, #23726
Associate Litigation Counsel
Kansas Board of Healing Arts
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sbrackman@ksbha.ks.gov

AGREED TO BY:

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Ivery A. Goldstein, # 22621
Simpson, Logback, Lynch & Norris, P.A.
107 SW 6th Avenue, Suite 210
Topeka, Kanas 66603
Attorneys for Licensee
P: 785-232-6200
cbonebrake@slln.com
igoldstein@slln.com

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I served a true and correct copy of the Consent Order by United States mail, postage prepaid, on this 15th day of August, 2014, to the following:

Joseph P. Clark, P.A.
Licensee
Confidential

Lawrence, Kansas 66049

Carol Ruth Bonebrake
Ivery A. Goldstein
Simpson, Logback, Lynch & Norris, P.A.
107 SW 6th Avenue, Suite 210
Topeka, Kansas 66603

And the original was hand-filed with:

Kathleen Selzler Lippert
Executive Director
Kansas Board of Healing Arts
800 SW Jackson, Lower Level-Suite A
Topeka, Kansas 66612

And a copy was delivered to:

Seth K. Brackman
Associate Litigation Counsel
Kansas Board of Healing Arts
800 SW Jackson, Lower Level-Suite A
Topeka, Kansas 66612

Compliance Coordinator
Kansas Board of Healing Arts
800 SW Jackson, Lower Level-Suite A
Topeka, Kansas 66612

Katy Lenahan
Licensing Administrator
Kansas Board of Healing Arts
800 SW Jackson, Lower Level-Suite A
Topeka, Kansas 66612

Cathy A. Brown