

**STATE OF ILLINOIS  
DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION  
DIVISION OF PROFESSIONAL REGULATION**

DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois,		)
	Complainant,	)
		)
v.		) No. 2017-00343
		)
METODIA J. WEBSTER, M.D., License No. 036.092382,	Respondent.	)

**CONSENT ORDER**

The Illinois Department of Financial and Professional Regulation, Division of Professional Regulation (Department), by and through Sarah M. Lipinski, Staff Attorney, and Metodia J. Webster, M.D., Respondent, by and through her attorney, Tom Luetkemeyer, hereby agree to the following:

**STIPULATIONS**

Respondent holds a Certificate of Registration as a Physician and Surgeon in the State of Illinois, License No. 036.092382. Said license is currently in ACTIVE status. At all times material to the matter set forth in this Consent Order, the Department had jurisdiction over the subject matter and parties herein.

On or about January 9, 2017, the Department received information that Respondent allegedly accessed and edited medical documentation to favor her position in litigation. The allegation(s) as set forth herein, if proven to be true, would constitute grounds for the Department to revoke, suspend, or otherwise discipline Respondent's license to practice as a Physician and Surgeon in the State of Illinois, on the authority of 225 ILCS 60/22(A)(5), (21), (37), and (41); 68 Ill. Admin. Code 1285.240; and 20 ILCS 2105/2105-130.

On December 20, 2017, an informal conference was held at the Department's Chicago office. Present on behalf of the Department were Sarah M. Lipinski, Staff Attorney, Cristina Mares, Law Clerk, and John Zander, M.D., Deputy Medical Coordinator. Sarita M. Massey, M.D., was present

on behalf of the Medical Disciplinary Board ("Board"). Respondent appeared in person along with her attorney, Tom Luetkermeier.

Respondent neither admits nor denies the allegations but Respondent acknowledges that should this matter proceed to a contested hearing, Board could find a violation of the Medical Practice Act. The Department and Respondent stipulate that the above acknowledgement is made only for the purposes of this Consent Order. In the event that this Consent Order is not approved by the Board or the Director of the Division of Professional Regulation of the Department ("Director"), this acknowledgement shall not be admissible in any proceeding and the matter will be set for an evidentiary hearing on the merits as if this Consent Order had not been submitted.

Respondent has been advised of the right to a formal hearing to contest the pending charges and the right to administrative review of any order resulting from said hearing. Respondent knowingly waives each of these rights, as well as the right to administrative review of this Consent Order. Such waiver ceases if this Consent Order is rejected by either the Board or the Director.

Respondent has freely and willingly agreed to this Consent Order without any threat or coercion by any person. Respondent acknowledges that she has not relied upon any statement or promise made on behalf of the Department except as set forth herein. Respondent and the Department have agreed in order to resolve this matter that Respondent be permitted to enter into a Consent Order with the Department providing for the imposition of disciplinary measures which are fair and equitable under the circumstances and which are consistent with the best interests of the people of the State of Illinois.

Following approval by the Director, Respondent consents and agrees to accept electronic service of this fully executed Consent Order via email, in lieu of certified or registered mail. Service shall be made upon Respondent's counsel's email address.

## CONDITIONS

WHEREFORE, the Department, through Sarah M. Lipinski, Staff Attorney, and Metodia J. Webster, M.D., Respondent, by and through her attorney, Tom Luetkemeyer, hereby agree to the following:

- A. Respondent's Illinois and Physician Surgeon License No. 036.092382 shall be REPRIMANDED;
- B. Respondent shall complete ten (10) hours of Category I Continuing Medical Education credits ("CMEs") related to medical record keeping (online or in-person) and ten (10) hours of Category I CMEs on the treatment of major depression (must be in-person);
  1. Respondent must complete said CMEs and must seek pre-approval in writing by the Department's Chief Medical Coordinator prior to attendance of said CMEs. Respondent shall send her written request for pre-approval to the Department's Chief Medical Coordinator within sixty (60) days of the effective date of this Order to:

**Illinois Department of Financial and Professional Regulation  
Attn: Chief Medical Coordinator  
100 W. Randolph Street, Suite 9-300  
Chicago, IL 60601.**
  2. Respondent shall submit proof of completion of the aforementioned CMEs to the Department within twelve (12) months of the effective date of this Consent Order. Said proof of completion shall be mailed to the Department's Chief Medical Coordinator at the address listed above;
  3. Said CMEs shall not count towards the one hundred and fifty (150) hours of continuing medical education required per license renewal cycle;
  4. In the event Respondent fails to complete the aforementioned CMEs within twelve (12) months of the effective date of this Consent Order, Respondent

acknowledges and agrees that her failure to complete the aforementioned CMEs will permit the Director to issue an order forthwith mandating the automatic, indefinite and immediate suspension of Respondent's Illinois Physician and Surgeon License, No. 036.092382, for a minimum period of twelve (12) months. This suspension shall not preclude the Department from taking any other disciplinary or other actions it deems appropriate. In the event that Respondent contests the factual basis underlying said indefinite suspension in a written petition that complies with the Department's Rules of Practice in Administrative Hearings, which is filed with the Department within fifteen (15) days of the effective date of the indefinite suspension, then Respondent shall be afforded a hearing on the merits within thirty (30) days from the filing of said petition;

- C. This disposition is considered a discipline for reporting purposes to entities such as the National Practitioner Data Bank; and
- D. This Consent Order shall become effective upon signing and approval by the Director.

**DEPARTMENT OF FINANCIAL AND  
PROFESSIONAL REGULATION  
of the State of Illinois**

02/09/18  
DATE

[Redacted Signature]

Sarah M. Lipinski  
Staff Attorney

1/30/18  
DATE

[Redacted Signature]

Metodia J. Webster, M.D.  
Respondent

3/2/18  
DATE

[Redacted Signature]

Tom Luetkemeyer  
Attorney for Respondent

2/21/18  
DATE

[REDACTED]  
Member  
Medical Disciplinary Board

The foregoing Consent Order is approved in full.

DATED THIS 5 day of March, 2018.

**DEPARTMENT OF FINANCIAL AND PROFESSIONAL  
REGULATION  
of the State of Illinois;  
Bryan A. Schneider, Secretary  
DIVISION OF PROFESSIONAL REGULATION**

[REDACTED]  
Jessica Baer  
DIRECTOR

REF: Case No. 2017-00343  
Lic. No. 036.092382