

BEFORE THE DIVISION OF OCCUPATIONAL AND PROFESSIONAL LICENSING  
OF THE DEPARTMENT OF COMMERCE  
OF THE STATE OF UTAH

---

IN THE MATTER OF THE LICENSES OF	:
PAULA K. GIBBS	:
TO PRACTICE AS A PHYSICIAN/SURGEON	: ORDER REINSTATING LICENSE
AND TO ADMINISTER AND PRESCRIBE	:
CONTROLLED SUBSTANCES	:
IN THE STATE OF UTAH	: Case No. DOPL-2002-157

---

BY THE DIVISION:

Respondent has satisfied the terms and conditions as set forth in the Division's Stipulation and Order, dated January 12, 2004, in the above-referenced case number.

IT IS HEREBY ORDERED the probation on the license of PAULA K. GIBBS to practice as a physician/surgeon is terminated and said license be reinstated with full privileges effective the date of this Order.

Dated this 12 day of October, 2007.

  
F. David Stanley  
Director

S E A



BEFORE THE DIVISION OF OCCUPATIONAL AND PROFESSIONAL LICENSING  
OF THE DEPARTMENT OF COMMERCE  
OF THE STATE OF UTAH

---

IN THE MATTER OF THE LICENSES OF :  
PAULA K. GIBBS : **AMENDED ORDER**  
TO PRACTICE MEDICINE AND TO :  
ADMINISTER AND PRESCRIBE CONTROLLED : Case No. DOPL-2002-157  
SUBSTANCES IN STATE OF UTAH :  
:

---

**BY THE DIVISION:**

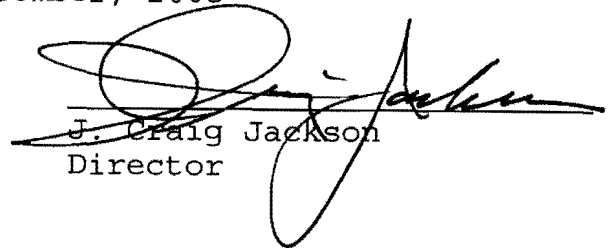
The Division's Stipulation and Order, dated January 12, 2004, in the above-referenced case is hereby amended as follows:

It is hereby ordered the probationary condition requiring Respondent to meet with the Physicians Licensing Board on quarterly basis was changed to require meetings with the Board every six months. Reports that are due from Respondent's supervisor and therapist will still need to be submitted on a quarterly basis.

All other conditions identified in the January 12, 2004 Stipulation and Order shall remain the same and in effect.

Dated this 22<sup>nd</sup> day of September, 2005



  
J. Craig Jackson  
Director

KARL G. PERRY - #2570  
Assistant Attorney General  
MARK L. SHURTLEFF - #4666  
Attorney General  
Commercial Enforcement Division  
Heber M. Wells Building, 5<sup>th</sup> Floor  
PO Box 140872  
Salt Lake City, UT 84114-0872  
Telephone: (801) 366-0310

---

**BEFORE THE DIVISION OF OCCUPATIONAL AND PROFESSIONAL LICENSING  
OF THE DEPARTMENT OF COMMERCE  
OF THE STATE OF UTAH**

---

IN THE MATTER OF THE LICENSES OF :  
**PAULA GIBBS-TAYLOR, M.D.** : **STIPULATION AND ORDER**  
TO PRACTICE MEDICINE AND TO :  
ADMINISTER AND PRESCRIBE : Case No. DOPL 2002-157  
CONTROLLED SUBSTANCES :  
IN THE STATE OF UTAH :

---

**STIPULATION**

The Division of Occupational and Professional Licensing of the Utah Department of Commerce (Division) and Paula Gibbs-Taylor (Respondent) stipulate and agree as follows:

1. Respondent admits the jurisdiction of the Division over her and over the subject matter of this action.
2. Respondent acknowledges that she enters into this Stipulation knowingly and voluntarily.
3. Respondent is represented by attorney, Neil A. Kaplan, Esq.

4. Respondent understands that she is entitled to a hearing before the Utah State Physicians Licensing Board [Board], or the presiding officer as designated by the Division Director, at which time she may present to the Board evidence on her behalf, present her own witnesses and confront adverse witnesses. Respondent acknowledges that by executing this document she waives: (1) the right to a hearing before the Board, (2) the right to present evidence on her behalf, (3) the right to present her own witnesses, and (4) the right to confront adverse witnesses, together with such other rights to which she may be entitled in connection with said hearing.

5. Respondent waives the right to issuance of a Notice of Agency Action.

6. Respondent acknowledges that this Stipulation and Order, if adopted by the Division Director, will be classified as a public document.

7. Respondent admits to the following:

(1) On approximately November 23, 1984 Respondent received her license to practice as a physician and surgeon. In approximately 1993 to 1996 Respondent was a psychiatric resident at the University of Utah.

(2) In approximately April 1994, Respondent, as a psychiatric resident, began to provide medical and mental health treatment to a patient (whose name is withheld for confidentiality who shall be referred to hereafter as Claimant). Claimant was an inpatient at the University of Utah Neuropsychiatric Unit (UNI). Claimant had a history of mental health diagnoses including Conversion Reaction, Multiple Personality Disorder, Borderline Personality Disorder, Eating Disorders and had been suicidal. Respondent's supervisor was Claimant's treating psychiatrist.

(3) In approximately April 1994, per Claimant's request, Respondent provided outpatient mental health treatment to Claimant following Claimant's discharge from UNI. Respondent

continued to provide mental health treatment to Claimant until June, 1996 when their physician/patient relationship formally terminated.

(4) Respondent admitted to a Division investigator that, during her mental health treatment of Claimant, she became confused about her relationship with Claimant due to Claimant's seductive manner and the physical attraction she felt for Claimant. Respondent expressed her concerns and confusion to both her supervisor and treating therapist. Respondent continued to provide mental health treatment to Claimant until approximately June 10, 1996. At the conclusion of Respondent's last mental health treatment session with Claimant, they embraced and shared a romantic kiss. Respondent immediately determined to terminate further treatment of Claimant.

(5) From approximately October 1996 to September 1998, Respondent became involved in an intermittent romantic and sexual relationship with Claimant. During the period of their relationship, Respondent and Claimant engaged in group sexual encounters that included Respondent's husband.

8. Respondent agrees an Order may be entered in this matter imposing the following sanctions and restrictions on her licenses:

(1) Respondent's license to practice medicine shall be placed on probation for a period of four (4) years to commence upon the signing of the Order approving this Stipulation. It is recognized that Respondent has been receiving psychotherapy treatment since January 1998 for the boundary issues outlined in this stipulation. This probation shall be reviewed by the Board/Division every two years to determine if probation should be terminated prior to the four years. During the period of probation, Respondent shall be subject to the following outlined terms and conditions. If the Board/Division later deems any of the conditions unnecessary such deletions may be made by an amended order issued by the Division.

(2) During the period of probation Respondent shall be subject to the following terms and conditions:

a.. Respondent shall identify a supervising physician who shall be approved by the Board/Division and who is in good standing with the Division who will agree to co-manage practice care issues with the Respondent. Respondent shall cause this supervisor to meet with the board during the first meeting with the Board following the signing of the order approving this stipulation to discuss oversight issues and the responsibilities expected of a physician supervisor. Respondent shall further cause her supervisor to submit written performance evaluations to the Board on a quarterly basis regarding the boundary violation issues. The receipt of any unfavorable evaluation submitted may be considered to be a violation of probation. If Respondent is not employed as a physician, she shall submit the supervisor report form on the date it is due and indicate on that form that current employment is not as a physician or that she is not currently working. Any cost of co-management shall be the Respondent's responsibility.

ZB

Sandra Fester  
ZB

b. Respondent shall continue in psychotherapeutic services, as deemed necessary by her treating therapist, to address her psychological issues and problems. Any treatment program or therapist from whom Respondent has or will receive treatment must be directed and authorized by Respondent to discuss her diagnosis, treatment, and prognosis with the Division and the Board. The therapist must also be directed to submit quarterly evaluations to the Board which address Respondent's progress in treatment and her prognosis.

c. Respondent shall successfully complete a professional boundaries program as approved by the Board/Division within nine (9) months from the date of the order approving this Stipulation and three (3) hours of continuing medical education (CE) in legal/medical ethics. Upon completion of the professional boundaries program and CE in law and ethics, Respondent shall provide documentation to the Board/Division for its review. Respondent shall discuss course availability and options with the Board at her initial Board meeting.

ZB

d. Respondent shall meet with the Board within thirty (30) days of the signing of the order approving this stipulation and on a quarterly basis, or at such other greater or lesser frequency, as determined by the Board/Division for the duration of the probationary period thereafter. Respondent shall meet with the Board at its first scheduled meeting after the effective date of the Order. Prior to meeting with the Board, Respondent shall meet with a Division staff member to review the terms of this Stipulation. Respondent agrees to notify the Division/Board if she is unable to attend a Board interview prior to its scheduled date.

ZB

e. Respondent shall provide long-term psychotherapeutic services to patients similar to Claimant (long term patients with sexual issues) only as approved and under such conditions as set by her co-manager. Respondent should be supported by her supervisors to 'evaluate and refer' similar cases as deemed appropriate by her co-manager.

ZB

f. Respondent shall complete an educational project or scholarly paper as agreed upon between the Respondent and the Board/Division. The subject matter of the project or paper would involve boundaries, transference and counter transference issues, ethical standards and professional guidelines.

JB

g. Respondent shall inform and provide a copy of this agreement to her employer(s). Respondent shall cause each employer to acknowledge to the Board, in writing, that she provided a copy of the agreement to the employer for its information and review. All employers shall notify the Board/Division of the receipt of such copy with written correspondence to the Division.

JB

h. Should Respondent not be employed in her licensed profession during her probationary period for a consecutive period of more than sixty (60) days, that period shall not apply to the reduction of Respondent's probation though the terms of probation shall remain applicable.

JB

i. If Respondent relocates to a different state, she agrees to notify the licensing authorities of the jurisdiction to which he moves within twenty (20) calendar days and to provide a copy of this agreement to the licensing authorities of that state. Periods of residency or practice outside of Utah may apply to the reduction of the probation period if the new state of residency places Respondent on probation with equal or greater terms and conditions.

JB

j. Respondent shall maintain current licenses to practice medicine and to administer and prescribe controlled substances at all times during the period of probation.

JB

k. Respondent shall notify the Division, within ten (10) calendar days, in writing, of any changes of her address both personally and professionally.

JB

l. In the event Respondent violates or fails to fulfill any terms or conditions as contained in this Stipulation, the Division may, in addition to taking action as provided herein, and after giving Respondent notice and the opportunity to be heard, revoke probation and otherwise proceed against Respondent under applicable law. If a petition to revoke probation is filed against Respondent during probation, the period of probation and all relevant probationary terms and conditions shall be extended until the matter is final.

JB

m. Respondent shall notify the Division within ten (10) calendar days if she is convicted of a non-traffic related crime. Respondent agrees that any criminal conviction (excluding traffic related offenses) will be deemed a violation of this agreement regardless if the conduct occurred prior to the entry of this agreement. Respondent shall complete all terms and conditions of any criminal ~~sanctions~~ <sup>sanctions</sup> including probation or parole. If Respondent is still on criminal probation or parole at the end of his Division administrative probationary period,

JB


her administrative probation shall be extended until all criminal conditions are completed.

9. This Stipulation and Order, upon approval by the Division Director shall be the final compromise and settlement of this matter. Respondent acknowledges the Division Director is not required to accept the terms of this Stipulation and Order and, if the Director does not do so, this Stipulation and the representations contained therein shall be null and void except the Division and Respondent waive any claim of bias or prejudice they might have with regard to the Director by virtue of his having reviewed this Stipulation.

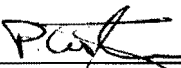
10. This document constitutes the entire agreement between the parties and supersedes any and all prior negotiations, representations, understandings or agreements between the parties regarding the subject of this Stipulation and Order. There are no verbal agreements which modify, interpret, construe or affect this Stipulation.

DIVISION OF OCCUPATIONAL AND PROFESSIONAL LICENSING


DATE: 1-5-04

BY:   
KARL G. PERRY  
Assistant Attorney General

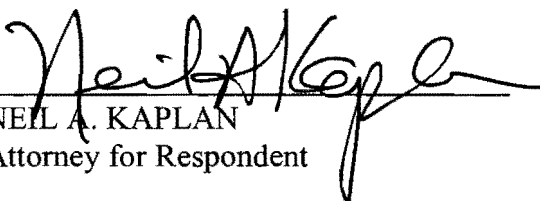
DATE: 12-24-03

BY:   
PAULA GIBBS-TAYLOR  
Respondent

DATE: 1-12-04

BY:   
DIANA BAKER,  
Bureau Manager

DATE: 12-31-03

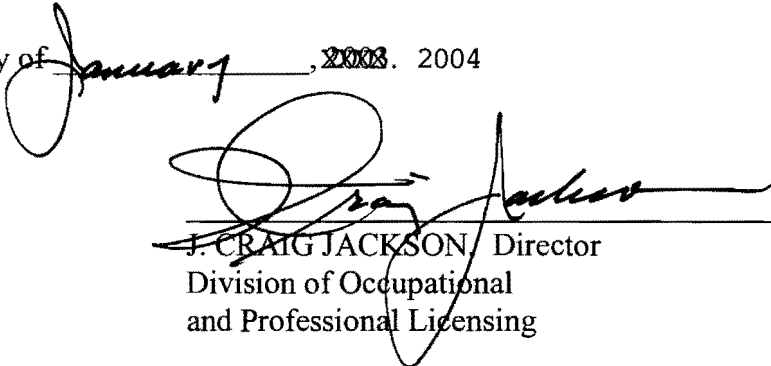
BY:   
NEIL A. KAPLAN  
Attorney for Respondent



ORDER

THE STIPULATION ABOVE regarding Paula Gibbs-Taylor, M.D., which is approved by the Division of Occupational and Professional Licensing, constitutes my Findings of Fact and Conclusions of Law in this matter. The terms and conditions of the Stipulation are incorporated herein and constitute my final Order in this case.

DATED this 12<sup>th</sup> day of January, ~~2003~~, 2004

  
\_\_\_\_\_  
J. CRAIG JACKSON, Director  
Division of Occupational  
and Professional Licensing

DIVISION OF OCCUPATIONAL AND PROFESSIONAL LICENSING  
Heber M. Wells Building  
160 East 300 South  
P O Box 146741  
Salt Lake City UT 84114-6741  
Telephone: (801) 530-6628

---

**BEFORE THE DIVISION OF OCCUPATIONAL AND PROFESSIONAL LICENSING  
OF THE DEPARTMENT OF COMMERCE  
OF THE STATE OF UTAH**

---

IN THE MATTER OF THE LICENSES OF :  
**PAULA GIBBS-TAYLOR, MD** : **NOTICE OF AGENCY ACTION**  
TO PRACTICE MEDICINE AND TO :  
PRESCRIBE AND ADMINISTER :  
CONTROLLED SUBSTANCES : Case No. DOPL-2002-157  
IN THE STATE OF UTAH :

---

THE DIVISION OF OCCUPATIONAL AND PROFESSIONAL LICENSING TO  
Paula Gibbs-Taylor ("Respondent"), 501 Chipeta Way #1123, Salt  
Lake City UT 84108:

The Division of Occupational and Professional Licensing  
("the Division") hereby files this Notice of Agency Action. Said  
action is based upon the Verified Petition of Dee Thorell,  
Investigator, State of Utah, a copy of which is attached hereto  
and incorporated herein by reference.

The adjudicative proceeding designated herein is to be  
conducted on a formal basis. **Within thirty (30) days of the  
mailing date of this Notice, you are required to file a written  
response with this Division.** The response you file may be  
helpful in clarifying, refining or narrowing the facts and  
violations alleged in the Verified Petition.

You may represent yourself or be represented by legal  
counsel at all times while this action is pending. Your legal  
counsel shall file with the Division an Entry of Appearance and  
until that Entry of Appearance is filed, the presiding officer  
will deal directly with you.

You are entitled by law to an evidentiary hearing to  
determine whether your licenses to practice medicine and to  
prescribe and administer controlled substances in the State of  
Utah should be subject to a disciplinary action. Unless  
otherwise specified by the Director of the Division, the

Physicians Licensing Board will serve as fact finder in the evidentiary hearing. You will be notified by separate notice of the date, time, and place of that evidentiary hearing and of any other hearings.

During the evidentiary hearing, you will have the opportunity to present evidence, argue, respond, conduct cross-examination and submit rebuttal evidence to the fact finder. After the hearing, unless otherwise specified by the Director of the Division, the fact finder will issue findings of fact, conclusions of law and a recommended order to the Director of the Division of Occupational and Professional Licensing for his review and action.

The presiding officer for purposes of conducting hearings will be J. Steven Eklund, Administrative Law Judge, Department of Commerce. He will rule on any evidentiary issues and matters of law or procedure. If you or your attorney have any questions as to the procedures relative to the hearing, Judge Eklund can be contacted at P O Box 146701, Salt Lake City, UT 84114-6701. His telephone number is (801) 530-6648.

Counsel for the Division in this case is Lorrie Lima, Assistant Attorney General at (801) 366-0300 or P O Box 140872, Salt Lake City, UT 84114-0872. Within ten (10) days after the filing of your response, Ms. Lima will request the scheduling of a prehearing conference.

You, or if you have an attorney, your attorney, may attempt to negotiate a settlement of the case without proceeding to a hearing by contacting Ms. Lima.

**Should you fail to timely file a response, as set forth above, or fail to attend or participate in any scheduled hearing in this case, including prehearing conference(s), you may be held in default without further notice to you. If you are held in default, the maximum administrative sanction consistent with the terms of the Verified Petition may be imposed against you. The maximum administrative sanction in this case is revocation of licensure and an administrative fine.**

Please conduct yourself accordingly.

Dated this 15<sup>th</sup> day of July, 2002.

W. Ray Walker  
W. Ray Walker  
Regulatory & Compliance  
Officer

LORRIE LIMA (USB 5872)  
Assistant Attorney General  
MARK L. SHURTLEFF (USB 4666)  
Attorney General  
Division of Commercial Enforcement  
Heber M. Wells Building  
160 East 300 South - PO Box 140872  
Salt Lake City, Utah 84114-0872  
Telephone: (801) 366-0521

---

BEFORE THE DIVISION OF OCCUPATIONAL AND PROFESSIONAL LICENSING  
OF THE DEPARTMENT OF COMMERCE  
OF THE STATE OF UTAH

---

IN THE MATTER OF THE LICENSES	:	
OF <b>PAULA GIBBS-TAYLOR, M.D.</b>	:	
TO PRACTICE MEDICINE AND TO	:	<b>P E T I T I O N</b>
ADMINISTER AND PRESCRIBE	:	
CONTROLLED SUBSTANCES	:	
IN THE STATE OF UTAH	:	Case No. DOPL-2002- 157

---

**PRELIMINARY STATEMENT**

These claims were investigated by the Utah Division of Occupational and Professional Licensing (Division) upon complaint that Paula Gibbs-Taylor (Respondent) engaged in acts and practices which constitute violations of the Division of Occupational and Professional Licensing Act, UTAH CODE ANN. §§ 58-1-101 to 58-1-504 (1998) and the Utah Medical Practice Act, UTAH CODE ANN. §§ 58-67-101 to 58-67-803 (1998).

## PARTIES

1. The Division is a division of the Utah Department of Commerce and it is established pursuant to UTAH CODE ANN. §§ 13-1-2 (2)(a) (1994) and 58-1-103 (1993).

2. Respondent is licensed by the Division to practice medicine under the Utah Medical Practice Act and to prescribe and administer controlled substances under the Controlled Substances Act. Respondent was licensed at all times material to the allegations contained herein.

## STATEMENT OF ALLEGATIONS

3. a. On approximately November 23, 1984 Respondent received her license to practice as a physician and surgeon. In approximately 1993 to 1996 Respondent was a psychiatric resident at the University of Utah.

b. In approximately April 1994, Respondent began to provide medical and mental health treatment to L.S. (name withheld for confidentiality). L.S. was an inpatient at the University of Utah Neuropsychiatric Unit (UNI). L.S. had a history of mental health diagnoses including Conversion Reaction, Multiple Personality Disorder, Borderline Personality Disorder, Eating Disorders and she had been suicidal.

c. In approximately April 1994, per L.S.'s request, Respondent provided outpatient mental health treatment to L.S. following her discharge from UNI. Respondent continued to provide mental health treatment to L.S. until June, 1996 when their physician/patient relationship formally terminated.

d. Respondent admitted to a Division investigator that, during her mental health treatment of L.S., she became confused about her relationship with L.S. due to the physical

attraction she felt for her. Respondent continued to provide mental health treatment to L.S. until approximately June 10, 1996. At the conclusion of Respondent's last mental health treatment session with L.S., they embraced and shared a romantic kiss.

e. From approximately October 1996 to September 1998, Respondent became involved in a committed romantic and sexual relationship with L.S. During the period of their relationship, Respondent and L.S. engaged in group sexual encounters that included Respondent's husband and L.S.'s sister.

#### APPLICABLE LAW

4. The Division is authorized to "revoke, suspend, restrict, place on probation, or otherwise act upon the license of a licensee who does not meet the qualifications for licensure under this title."

UTAH CODE ANN. § 58-1-401(1) (1994-1998).

5. Good moral character is a quality a physician must possess as a requirement for licensure to practice medicine.

UTAH CODE ANN. § 58-67-302(c) (1996-1998).<sup>1</sup>

6. The Division may take disciplinary action of a licensee's license as follows:

(a) the applicant or licensee has engaged in unprofessional conduct as defined by statute or rule under this title.

UTAH CODE ANN. § 58-1-401(2)(a) (1994-1998).

7. Unprofessional conduct is defined statutorily to include:

(b) violating, or aiding or abetting any other person to violate, any generally accepted

---

<sup>1</sup> The statutory cite for the time period of 1994 and 1995 is U.C.A. § 56-12-31(3).

professional or ethical standard applicable to an occupation or profession regulated under this title;

(g) practicing or attempting to practice an occupation or profession regulated under this title through gross incompetence, gross negligence, or a pattern of incompetency or negligence;

(k) verbally, physically, mentally, or sexually abusing or exploiting any person through conduct connected with the licensee's practice under this title or otherwise facilitated by the licensee's license.

UTAH CODE ANN. § 58-1-501(2)(b), (g) and (k) (1994-1998).

8. The American Psychiatric Association *Principles of Medical Ethics* provide in relevant part as follows:

Section 1. A physician shall be dedicated to providing competent medical service with compassion and respect for human dignity

*1. The patient may place his/her trust in his/her psychiatrist knowing that the psychiatrist's ethics and professional responsibilities preclude him/her gratifying his/her own needs by exploiting the patient. The psychiatrist shall be ever vigilant about the impact that his/her conduct has upon the boundaries of the doctor/patient relationship, and thus upon the well being of the patient. These requirements become particularly important because of the essentially private, highly personal, and sometimes intensely emotional nature of the relationship established with the psychiatrist.*

Section 2. A physician shall deal honestly with patients and colleagues, and strive to expose those physicians deficient in character or competence, or who engage in fraud or deception.

*1. The requirement that the physician conduct himself/herself with propriety in his/her profession and in all the actions of his/her life is especially important in the case of the psychiatrist because the patient tends to model his/her behavior after that of his/her psychiatrist by identification. Further, the necessary intensity of the treatment relationship may tend to activate sexual and other needs and fantasies on the part of both patient and psychiatrist, while weakening the objectivity necessary for control. Additionally, the inherent inequality in the doctor-patient relationship may lead to exploitation of the patient. Sexual activity with a current or former patient is unethical.*

*THE PRINCIPLES OF MEDICAL ETHICS WITH ANNOTATIONS ESPECIALLY APPLICABLE TO PSYCHIATRY, SECTIONS 1, 2 and 4 (1994-1998).*

7

9. The American Medical Association *Code of Medical Ethics* provides in relevant part as follows:

Sexual or romantic relationships between a physician and former patients may be unduly influenced by the previous physician-patient relationship. Sexual or romantic relationships with former patients are unethical if the physician uses or exploits trust, knowledge, emotions or influence derived from the previous professional relationship.

*CODE OF MEDICAL ETHICS*, SECTION 8.14, SEXUAL MISCONDUCT IN THE PRACTICE OF MEDICINE (1994-1998).

10. The Division has the authority to assess an administrative fine as follows:

(1) After proceeding pursuant to Title 63, Chapter 46b, Administrative Procedures Act, and Title 58, Chapter 1, Division of Occupational and Professional Licensing Act, the division may impose administrative penalties of up to \$10,000 for acts of unprofessional conduct under this chapter.

UTAH CODE ANN. § 58-67-402(1) (1996-1998).<sup>2</sup>

### COUNT I

11. Paragraphs 1 through 10 are incorporated by reference as if fully set forth herein.

12. Respondent engaged in a romantic, sexual relationship with a patient. Therefore, Respondent has demonstrated a lack of good moral character and she has failed to maintain a qualification for licensure as defined in UTAH CODE ANN. § 58-67-302(c) establishing grounds to invoke sanctions against her licenses pursuant to UTAH CODE ANN. § 58-1-401(1) and to impose an administrative fine pursuant to UTAH CODE ANN. § 58-67-402(1).

---

<sup>2</sup> Prior to 1996, the Utah Medical Practice Act did not have a section that authorized the Division to assess administrative fines against a licensee for acts of unprofessional conduct.



**COUNT II**

13. Paragraphs 1 through 10 are incorporated by reference as if fully set forth herein.

14. Respondent engaged in a romantic, sexual relationship with a patient. Therefore, Respondent violated her professional and ethical responsibilities as a psychiatrist and she engaged in unprofessional conduct as defined in UTAH CODE ANN. § 58-1-501(2)(b), the American Psychiatric Association *Principles of Medical Ethics* and the American Medical Association *Code of Medical Ethics* establishing grounds to sanction her licenses pursuant to UTAH CODE ANN. § 58-1-401(2)(a) and to impose an administrative fine pursuant to UTAH CODE ANN. § 58-67-402(1).

**COUNT III**

15. Paragraphs 1 through 10 are incorporated by reference as if fully set forth herein.

16. Respondent engaged in a romantic, sexual relationship with a patient. Therefore, Respondent practiced gross incompetence, gross negligence or a pattern of incompetency or negligence and she engaged in unprofessional conduct as defined in UTAH CODE ANN. § 58-1-501(2)(g) establishing grounds to sanction her licenses pursuant to UTAH CODE ANN. § 58-1-401(2)(a) and to impose an administrative fine pursuant to UTAH CODE ANN. § 58-67-402(1).

**COUNT IV**

17. Paragraphs 1 through 10 are incorporated by reference as if fully stated herein.

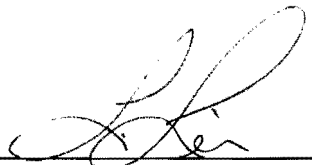
18. Respondent engaged in a romantic, sexual relationship with her patient L.S. Therefore, Respondent verbally, physically, mentally or sexually abused or exploited a patient and engaged in unprofessional conduct as defined in UTAH CODE ANN. § 58-1-501(2)(k)

establishing grounds to sanction her licenses pursuant to UTAH CODE ANN. § 58-1-401(2)(a) and to impose an administrative fine pursuant UTAH CODE ANN. § 58-67-402(1).

WHEREFORE, the Division requests the following relief:

1. That Respondent be adjudged and decreed to have engaged in the acts alleged herein;
2. That, by engaging in the above acts, Respondent be adjudged and decreed to have violated the above-enumerated provisions of the Division of Occupational and Professional Licensing Act and the Utah Medical Practice Act;
3. That an order be issued imposing an appropriate sanction(s) against Respondent's licenses;
4. That an administrative fine be assessed against Respondent.

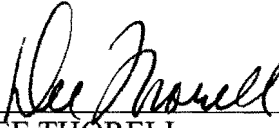
DATED this 12th day of July, 2002.

  
\_\_\_\_\_  
LORRIE LIMA  
Assistant Attorney General

STATE OF UTAH )  
 ) :ss.  
COUNTY OF SALT LAKE )

Dee Thorell, being first duly sworn, states as follows:

1. I am an investigator for the Bureau of Investigation, Division of Occupational and Professional Licensing, and I was assigned to investigate this case.
2. I have read the foregoing petition and I am familiar with the contents thereof. All of the factual allegations in the petition are true to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
DEE THORELL,  
Investigator  
Division of Occupational and  
Professional Licensing

SWORN TO AND SUBSCRIBED before me this 15 day of July, 2002.

  
\_\_\_\_\_  
NOTARY PUBLIC

