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In The Matter Of

SUZETTE LUCILLE CULLINS, M.D.  
(Certificate No. 020711 ),

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No. 05-I-582

STIPULATION AND  
AGREEMENT FOR  
VOLUNTARY SURRENDER  
OF MEDICAL LICENSURE

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1. *Acknowledgment and Stipulations.* Dr. Cullins hereby acknowledges, stipulates and agrees that:

- (a) An investigation was conducted on behalf of the Board, through its Investigating Officer indicating that, on or about July 25, 2006, Dr. Cullins was convicted of a federal felony count of conspiracy to prescribe narcotics without a legitimate medical purpose and five federal felony counts of dispensing controlled substances without a legitimate medical purpose.
- (b) Pursuant to the Louisiana Medical Practice Act and the Louisiana Administrative Procedure Act, Dr. Cullins would be entitled, prior to final disciplinary action against her medical license, to have notice of the allegations and charges asserted against her, and to administrative adjudication of such charges, pursuant to La. Rev. Stat. §§49:955-958. At such hearing, Dr. Cullins would be entitled to be represented by legal counsel, to call witnesses and present evidence on her own behalf in defense or in mitigation of the charges made, and to a decision thereon by the Board based upon written findings of fact and conclusions of law pursuant to La. Rev. Stat. §§49:955-965.



2. *Voluntary Surrender of License.* Notwithstanding her right to notice of formal charges, administrative hearing and a decision thereon, as provided by La. Rev. Stat. §49:955, in recognition of the stipulations set forth hereinabove toward final disposition of the investigation now pending in this matter and in lieu of the institution and prosecution of formal administrative proceedings, Dr. Cullins, nonetheless, hereby waives her right to notice of charges and formal adjudication and hereby voluntarily surrenders to the Board, for cancellation, her license to practice medicine in the state of Louisiana, as evidenced by Certificate No. 020711. By her subscription hereto, Dr. Cullins also hereby authorizes the Investigating Officer designated by the Board with respect hereto and/or her legal counsel assisting her in that capacity, to present this Stipulation and Agreement for Voluntary Surrender of Medical License to the Board for its consideration and to fully disclose to and discuss with the Board the nature and results of the investigation, and she waives any objection to such disclosures, under La. Rev. Stat. §49:960.

3. *Effect of Voluntary Surrender of License.* Dr. Cullins acknowledges, stipulates and agrees that the voluntary surrender of her medical license effected hereby in the presence of an administrative investigation shall have, and shall be deemed by the Board to have, the same effect as if the Board had entered an order of revocation upon the conclusion of formal administrative proceedings. Dr. Cullins further acknowledges, stipulates and agrees that as a result of the voluntary surrender of her medical license effected hereby she shall not have any right or entitlement to reinstatement or renewal of her license to practice medicine in the state of Louisiana, nor shall she hereafter be entitled to apply for or otherwise attempt to obtain any original, reinstated or renewal license to practice medicine in the state of Louisiana except with the Board's permission and consent, in its sole discretion, and on such terms as the Board may then require.

4. *Surrender of Controlled Substances Privileges.* As of the effective date of the Board's acceptance hereof, Dr. Cullins shall not prescribe, dispense or administer any controlled substance as defined, enumerated or included in federal or state statutes or regulations, 21 C.F.R. §1308, La. Rev. Stat. §40:964, or any substance which may hereafter be designated a controlled substance by amendment or supplementation of such regulations and statutes within the state of Louisiana. Dr. Cullins has previously surrendered for cancellation to the issuing authorities, any and all state and federal registrations authorizing Dr. Cullins to prescribe, dispense, or administer any controlled substance and said surrender is in effect.

5. *Termination of Proceedings.* By the voluntary surrender of her medical license, and the attendant dismissal of the investigation occasioned hereby, Dr. Cullins, moreover, acknowledges, stipulates and agrees that she hereby waives any right to which she may be entitled pursuant to the Louisiana Administrative Procedure Act or to which otherwise may be afforded to her by law, to contest her agreement to, or the force and effect of, this document in any court relating to the matters referred to herein.



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6. *Public Record.* Dr. Cullins acknowledges, stipulates and agrees that this Stipulation and Agreement for Voluntary Surrender of Medical License shall be and shall be deemed to be a public record.

**STIPULATION, ACKNOWLEDGMENT AND AGREEMENT**

I, SUZETTE LUCILLE CULLINS, M.D., hereby acknowledge, approve, accept, stipulate, agree and consent to entry of the above and foregoing this 19 day of January, 2007.

Suzette Lucille Cullins, M.D.  
SUZETTE LUCILLE CULLINS, M.D.

WITNESS:

Keith A. Hyatt

**ACCEPTANCE**

CONSIDERING THE ABOVE AND FOREGOING, the Stipulation and Agreement for Voluntary Surrender of Medical License is hereby APPROVED AND ACCEPTED by the Louisiana State Board of Medical Examiners, this 19<sup>th</sup> day of February, 2007, effective immediately.

**LOUISIANA STATE BOARD  
OF MEDICAL EXAMINERS**

By: Kwesi J. Amusa, M.D.  
KWESI J. AMUSA, M.D.  
President

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