

LOUISIANA STATE BOARD OF MEDICAL EXAMINERS

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BEFORE THE LOUISIANA STATE BOARD OF MEDICAL EXAMINERS

Ext. _____

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: **No. 07-I-117**
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In The Matter Of
:
RODNEY J. KRUMM, JR., CLP
(Certificate No. G01243), : **STIPULATION AND AGREEMENT FOR**
:
Respondent. : **VOLUNTARY SURRENDER OF CLINICAL**
:
: **LABORATORY SCIENCE LICENSE**
----- X

THIS STIPULATION AND AGREEMENT is made and executed by Rodney J. Krumm, CLP ("Mr. Krumm"), a clinical laboratory scientist-generalist, who at all times pertinent was and is licensed as of the date hereof to practice clinical laboratory science in the state of Louisiana and engaged in the practice of clinical laboratory science in and around Slidell, Louisiana, with and in favor of the Louisiana State Board of Medical Examiners (the "Board").

1. **ACKNOWLEDGMENT AND STIPULATIONS.** Mr. Krumm hereby acknowledges, stipulates and agrees that:

a. An investigation conducted on behalf of the Louisiana State Board of Medical Examiners (the "Board"), through its Investigating Officer, reveals that Mr. Krumm was arrested in May 2006 and charged with seven counts of prescription fraud and possession with intent to distribute controlled dangerous substances. It was further alleged that he forged prescriptions in the name of an emergency room physician in order to obtain these prescriptions. Specifically, forgeries for three prescriptions for Hydrocodone/APAP and four prescriptions for Lorazepam are at issue. The information further reveals that Mr. Krumm, who is also licensed as a pharmacist, surrendered his Pharmacist license on August 15, 2006. Mr. Krumm advised the Board that in November 2006 he pled guilty to the felony charge possession of a controlled dangerous substance by fraud, in violation of La. Rev. Stat. §40:971(B)(1)(b).

Such investigation indicates, to the satisfaction of the Board's Investigating Officer, that sufficient cause exists for action against Mr. Krumm's license to practice clinical laboratory science in this state under the Louisiana Clinical Laboratory Science Practice Act.¹ (the "Act").¹

¹ La. Rev. Stat. §37:1311-1329; 1326.

b. Pursuant to the Act and the Louisiana Administrative Procedure Act, La. Rev. Stat. §§49:951, *et. seq.*, Mr. Krumm would be entitled, prior to disciplinary action against his clinical laboratory science license, to have notice of any allegations and charges asserted against him and to administrative adjudication of such charges, pursuant to La. Rev. Stat. §§49:951, *et. seq.* At such hearing Mr. Krumm would be entitled to be represented by legal counsel, to call witnesses and present evidence on his 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. §§49:951, *et. seq.*

2. **VOLUNTARY SURRENDER OF LICENSE.** In lieu of the institution and prosecution of formal administrative proceedings in this matter, and notwithstanding his right to notice of formal charges, administrative hearing and a decision thereon, as provided by La. Rev. Stat. §49:951, *et seq.* in recognition of the stipulations set forth herein above toward final disposition of the investigation now pending in this matter Mr. Krumm, nonetheless, hereby waives his right to notice of charges and formal adjudication and hereby voluntarily surrenders to the Board for cancellation his license to practice clinical laboratory science in the state of Louisiana, as evidenced by Certificate No. G01243. By his subscription hereto Mr. Krumm also hereby authorizes the Investigating Officer designated by the Board with respect hereto 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 he waives any objection to such disclosures under La. Rev. Stat. §49:960.

3. **EFFECT OF VOLUNTARY SURRENDER OF LICENSE.** Mr. Krumm acknowledges, stipulates and agrees that the voluntary surrender of his clinical laboratory science 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. Mr. Krumm further acknowledges, stipulates and agrees that as a result of the voluntary surrender of his clinical laboratory science license effected hereby he shall not have any right or entitlement to reinstatement or renewal of such license nor shall he hereafter be entitled to apply for or otherwise attempt to obtain any original, reinstated or renewal license to practice any category of clinical laboratory science in the state of Louisiana.

4. **TERMINATION OF PROCEEDINGS.** By the voluntary surrender of his clinical laboratory science license occasioned hereby Mr. Krumm moreover, acknowledges, stipulates and agrees that he hereby waives any right to which he may be entitled pursuant to the Louisiana Administrative Procedure Act, La. Rev. Stat. §§49:951, *et. seq.*, or which otherwise may be afforded to him by any law to contest his agreement to, or the force and effect of this document in any court or other forum relating to stipulations, agreements, acknowledgments and other matters referred to herein.

5. **ADVICE OF COUNSEL.** Mr. Krumm acknowledges that he has had the opportunity to seek the advice and guidance of legal counsel with respect to this Stipulation and that all of the terms, conditions, restrictions and limitations contained herein have been explained to him and/or that he fully understands them.

6. **PUBLIC RECORD.** Mr. Krumm 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 and Agreement and Acceptance pages
follow this page*

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**STIPULATION
AND AGREEMENT**

STATE OF LOUISIANA
PARISH OF St. Tammany

I, RODNEY J. KRUMM, CLP, hereby acknowledge, approve, accept and consent to entry of the above and foregoing Stipulation and Agreement, this 15th day of March, 2007.


RODNEY J. KRUMM, CLP

WITNESSES:

Elizabeth Rivero
Signature

Elizabeth Rivero
Typed Name

155 Robert St. Slidell, LA
Address

Terry M. Theriot
Signature

Terry M. Theriot
Typed Name

155 Robert St. Slidell, LA
Address

Sworn to and subscribed before me at Slidell, Louisiana, this 15th day of March, 2007, in the presence of the two stated witnesses.


Notary Public

J. Edward Thompson
Printed Name/Notary # 18466

ACCEPTANCE

CONSIDERING THE ABOVE AND FOREGOING, the Stipulation and Agreement for Voluntary Surrender of Clinical Laboratory Scientist License is hereby **APPROVED AND ACCEPTED** by the Louisiana State Board of Medical Examiners, this 16th day of April, 2007.

**LOUISIANA STATE BOARD OF
MEDICAL EXAMINERS**

By:


KWELI J. AMUSA, M.D.
President

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