

FILED OF RECORD

AUG 16 2024

K.B.M.L.

COMMONWEALTH OF KENTUCKY
BOARD OF MEDICAL LICENSURE
CASE NO. 2168

IN RE: THE LICENSE TO PRACTICE MEDICINE IN THE COMMONWEALTH OF KENTUCKY HELD BY LAWRENCE H. PETERS, M.D., LICENSE NO. 31716, 4402 CHURCHMAN AVENUE, #404, LOUISVILLE, KENTUCKY 40215

COMPLAINT

Comes now the Complainant Waqar A. Saleem, M.D., Chair of the Kentucky Board of Medical Licensure's Inquiry Panel A, and on behalf of the Panel which met on August 15, 2024, states for its Complaint against the licensee, Lawrence H. Peters, M.D., as follows:

1. At all relevant times, Lawrence H. Peters, M.D., ("licensee") was licensed by the Board to practice medicine within the Commonwealth of Kentucky.
2. The licensee's medical specialty is pain medicine.
3. On or about June 16, 2022, the licensee entered into an Agreed Order, Case No. 2036, in which he stipulated, in part, the following:
 - The licensee has owned and operated a pain management facility for the past twenty-two (22) years;
 - Beginning September 1, 2012 and continuing on September 1 of each succeeding year through 2021, the licensee failed to annually register his pain management facility with the Board.
 - On April 21, 2022, the hearing officer rendered a Recommended Order Granting Motion for Default Ruling, finding the licensee in violation of KRS 311.595(12) by failing to file the required annual registration as required by the Board's regulation. ...
4. On or about April 26, 2024, after the licensee completed the terms of the Agreed Order (being the completion of the *Medical Ethics and Professionalism (ME-15)* course offered through PBI Education and reimbursement of the Board's costs in the amount of \$2,218.75), the Agreed Order was terminated.

5. On or about June 18, 2024, in *USA v. Peters*, Case No. 3:24-CR-00075-DJH (U.S. District Court, Western District of Kentucky), the licensee was charged with violation of Title 21, United States Code, Sections 843(a)(2) and 846, by information as follows:

Beginning on or about December 20, 2018, and continuing through on or about January 7, 2019, in the Western District of Kentucky, Jefferson County, Kentucky, and elsewhere, the defendant, LAWRENCE PETERS, did knowingly and intentionally combine, conspire, confederate and agree with other persons, known and unknown, to use a registration number belonging to another person in the course of dispensing and distributing Schedule II controlled substances, to wit: LAWRENCE PETERS conspired with his staff to issue pre-signed and unsigned prescriptions for Schedule II controlled substances and further directed his staff to fill the prescriptions at his physician's owned pharmacy.

6. On or about June 27, 2024, the Board received notice of a WNKY news report titled "6 Kentuckians, including a Glasgow woman, charged following nationwide healthcare fraud operation," in which it was reported that

[The licensee] was charged by information with conspiracy to illegally use a Drug Enforcement Administration registration number issued to another. According to the information, [the licensee] allegedly conspired with others in his medical practice to issue pre-signed and unsigned prescriptions for Schedule II controlled substances and further directed his staff to fill the prescriptions at his physician's owned pharmacy. ...

7. By his conduct, the licensee has violated the provisions of KRS 311.595(9), as illustrated by KRS 311.597(4), KRS 311.595(10) and (12).
8. Accordingly, legal grounds exist for disciplinary action against his Kentucky medical license.
9. The licensee is directed to respond to the allegations delineated in the Complaint within thirty (30) days of service thereof and is further given notice that:
 - (a) His failure to respond may be taken as an admission of the charges;

(b) He may appear alone or with counsel, may cross-examine all prosecution witnesses and offer evidence in his defense.

10. NOTICE IS HEREBY GIVEN that a hearing on this Complaint is scheduled for **December 9, 2024**, at 9:00 a.m., Eastern Standard Time, at the Kentucky Board of Medical Licensure, Hurstbourne Office Park, 310 Whittington Parkway, Suite 1B, Louisville, Kentucky 40222. Said hearing shall be held pursuant to the Rules and Regulations of the Kentucky Board of Medical Licensure and pursuant to KRS Chapter 13B. This hearing shall proceed as scheduled and the hearing date shall only be modified by leave of the Hearing Officer upon a showing of good cause.


WHEREFORE, Complainant prays that appropriate disciplinary action be taken against the license to practice medicine held by LAWRENCE H. PETERS, M.D.

This 16th day of August, 2024.


WAQAR A. SALEEM., M.D.
CHAIR, INQUIRY PANEL A

CERTIFICATE OF SERVICE

I certify that the original of this Complaint was delivered to Mr. Michael S. Rodman, Executive Director, Kentucky Board of Medical Licensure, 310 Whittington Parkway, Suite 1B, Louisville, Kentucky 40222; a copy was mailed to Wes Faulkner, Esq., Hearing Officer, 125 South Seventh Street, Louisville, Kentucky 40202 and copies were mailed via certified mail return-receipt requested and sent via email to the licensee, Lawrence H. Peters, M.D., License No. 31716, 4402 Churchman Avenue, #404, Louisville, Kentucky 40215 l.petersmd@yahoo.com, and to the licensee's counsel, J. Fox DeMoisey, Esq., 7241 Fox Harbor Road, Prospect, Kentucky 40059 fox@demoiseylaw.com, on this 16th day of August, 2024.


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