

**STATE OF FLORIDA
DEPARTMENT OF HEALTH**

DEPARTMENT OF HEALTH,

PETITIONER,

v.

CASE NO.: 2017-00917

GEOFFREY LAKE RISLEY, M.D.,

RESPONDENT.

ADMINISTRATIVE COMPLAINT

Petitioner, Department of Health, by and through its undersigned counsel, and files this Administrative Complaint before the Board of Medicine against the Respondent, Geoffrey Lake Risley, M.D., and in support thereof alleges:

1. Petitioner is the state agency charged with regulating the practice of medicine pursuant to Section 20.43, Florida Statutes; Chapter 456, Florida Statutes; and Chapter 458, Florida Statutes.

2. At all times material to this Complaint, Respondent was a licensed physician within the State of Florida, having been issued license number ME 83348.

3. Respondent's address of record is 1824 King Street, Suite 200, Jacksonville, FL 32204.

4. Respondent is board certified in general and vascular surgery by the American Board of Surgery.

5. On or about August 15, 2016, Patient S.N. presented to Respondent with peripheral vascular disease, a non-healing ulcer on his left third toe tip, and diminished arterial blood flow in both legs.

6. Based on the evaluation on or about August 15, 2016, Respondent determined that a left-leg arteriogram was necessary.

7. On or about August 18, 2016, Patient S.N.'s family consented to a left leg arteriogram and Respondent pre-operatively marked Patient S.N.'s left leg and correctly performed a time out.

8. After Respondent performed the time out, Respondent performed a right-leg arteriogram instead of the planned left leg arteriogram.

15. Section 456.072(1)(bb), Florida Statutes (2016), provides that performing or attempting to perform health care services (including the preparation of the patient) on the wrong patient, a wrong-site procedure, a wrong procedure, or an unauthorized procedure or a procedure that is

medically unnecessary or otherwise unrelated to the patient's diagnosis or medical condition is grounds for disciplinary action by the Board of Medicine.

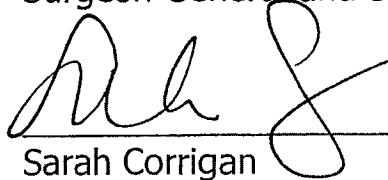
16. Respondent performed a wrong-site procedure by performing an arteriogram on Patient S.N.'s right leg (wrong-site) instead of on Patient S.N.'s left leg (correct site).

17. Based on the foregoing, Respondent violated Section 456.072(1)(bb), Florida Statutes (2016), by performing or attempting to perform health care services on the wrong patient, a wrong-site procedure, a wrong procedure, or an unauthorized procedure or a procedure that is medically unnecessary or otherwise unrelated to the patient's diagnosis or medical condition.

WHEREFORE, the Petitioner respectfully requests that the Board of Medicine enter an order imposing one or more of the following penalties: permanent revocation or suspension of Respondent's license, restriction of practice, imposition of an administrative fine, issuance of a reprimand, placement of the Respondent on probation, corrective action, refund of fees billed or collected, remedial education and/or any other relief that the Board deems appropriate.

SIGNED this 23RD day of OCTOBER, 2017.

Celeste Philip, M.D., M.P.H.
Surgeon General and Secretary



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FILED

DEPARTMENT OF HEALTH
DEPUTY CLERK

CLERK. *Amber Greene*

DATE OCT 24 2017

SEC/

PCP: October 23, 2017

PCP Members: Dr. Avila, Dr. Rosenberg, Mr. Mullins

NOTICE OF RIGHTS

Respondent has the right to request a hearing to be conducted in accordance with Section 120.569 and 120.57, Florida Statutes, to be represented by counsel or other qualified representative, to present evidence and argument, to call and cross-examine witnesses and to have subpoena and subpoena duces tecum issued on his or her behalf if a hearing is requested. A request or petition for an administrative hearing must be in writing and must be received by the Department within 21 days from the day Respondent received the Administrative Complaint, pursuant to Rule 28-106.111(2), Florida Administrative Code. If Respondent fails to request a hearing within 21 days of receipt of this Administrative Complaint, Respondent waives the right to request a hearing on the facts alleged in this Administrative Complaint pursuant to Rule 28-106.111(4), Florida Administrative Code. Any request for an administrative proceeding to challenge or contest the material facts or charges contained in the Administrative Complaint must conform to Rule 28-106.2015(5), Florida Administrative Code.

Please be advised that mediation under Section 120.573, Florida Statutes, is not available for administrative disputes involving this agency action.

NOTICE REGARDING ASSESSMENT OF COSTS

Respondent is placed on notice that Petitioner has incurred costs related to the investigation and prosecution of this matter. Pursuant to Section 456.072(4), Florida Statutes, the Board shall assess costs related to the investigation and prosecution of a disciplinary matter, which may include attorney hours and costs, on the Respondent in addition any other discipline imposed.