

**BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation)	
Against:)	
)	
)	
Teresa Leola Jackson, M.D.)	Case No. 16-2011-218531
)	
Physician's and Surgeon's)	
Certificate No. A71589)	
)	
Respondent)	
_____)	


DECISION

The attached Stipulated Surrender of License is hereby adopted as the Decision and Order of the Medical Board of California, Department of Consumer Affairs, State of California.

This Decision shall become effective at 5:00 p.m. on February 17, 2012.

IT IS SO ORDERED February 10, 2012.

MEDICAL BOARD OF CALIFORNIA

By: 

Linda K. Whitney
Executive Director

1 KAMALA D. HARRIS, Attorney General
of the State of California
2 JOSE R. GUERRERO
Supervising Deputy Attorney General
3 JANE ZACK SIMON [SBN 116564]
Deputy Attorney General [SBN 116564]
4 455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102
5 Telephone: (415) 703-5544
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6

7 Attorneys for Complainant

8
9 **BEFORE THE**
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
10 **STATE OF CALIFORNIA**

11
12 **In the Matter of the Accusation Against:**

13 **TERESA LEOLA JACKSON, M.D.**
14 7063 N. Mission Hall Lane
Tucson, AZ 85718

15 Physician's and Surgeon's Certificate No. A71589
16

Case No.: 16-2011-218531

**STIPULATED SURRENDER OF
LICENSE**

17 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this
18 proceeding that the following matters are true:

19 1. Linda K. Whitney (Complainant) is the Executive Director of the Medical
20 Board of California. This action has at all times been maintained solely in the official capacity of
21 the Executive Director of the Medical Board of California, who is represented by Kamala D.
22 Harris, Attorney General of the State of California, by Jane Zack Simon, Deputy Attorney
23 General.

24 2. Teresa Leola Jackson, M.D. (Respondent) is representing herself in this
25 proceeding.

26 3. Respondent has received, read, and understands the Accusation which is
27 presently on file and pending in case number 16-2011-218531 (the "Accusation") a copy of
28

1 which is attached as Exhibit A.

2 4. Respondent has carefully read and understands the charges and allegations
3 in the Accusation. Respondent also has carefully read and understands the effects of this
4 Stipulated Surrender of License.

5 5. Respondent is fully aware of her legal rights in this matter, including the
6 right to a hearing on the charges and allegations in the Accusation; the right to be represented by
7 counsel, at her own expense; the right to confront and cross-examine the witnesses against her;
8 the right to present evidence and to testify on her own behalf; the right to the issuance of
9 subpoenas to compel the attendance of witnesses and the production of documents; the right to
10 reconsideration and court review of an adverse decision; and all other rights accorded by the
11 California Administrative Procedure Act and other applicable laws.

12 6. Respondent voluntarily, knowingly, and intelligently waives and gives up
13 each and every right set forth above.


14 7. Respondent agrees that the Board has jurisdiction and cause to discipline
15 her physician's and surgeon's certificate by virtue of the allegations set forth in the Accusation
16 and pursuant to Business and Professions Code §822. Respondent wishes to surrender her
17 California license.

18 8. Pursuant to section 2224(b) of the Business and Professions Code, this
19 Stipulation for Surrender of License shall be subject to the approval of the Board. Respondent
20 understands and agrees that the Medical Board's staff and counsel for Complainant may
21 communicate directly with the Board regarding this Stipulation for Surrender of License, without
22 notice to or participation by Respondent. By signing this Stipulation for Surrender of License,
23 Respondent understands and agrees that she may not withdraw his agreement or seek to rescind
24 the Stipulation prior to the time the Board considers and acts upon it. In the event that this
25 Stipulation is rejected for any reason by the Board, it will be of no force or effect for either
26 party. The Board will not be disqualified from further action in this matter by virtue of its
27 consideration of this Stipulation.

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1 formal acceptance. By signing this stipulation to surrender my license, I recognize that upon its
2 formal acceptance by the Board, I will lose all rights and privileges to practice as a physician and
3 surgeon in the State of California and I also will cause to be delivered to the Board any license
4 and wallet certificate in my possession before the effective date of the decision.

5 DATED: 1/10/2012


6 
7 **TERESA LEOLA JACKSON, M.D.**
8 Respondent

9 **ENDORSEMENT**

10 The foregoing Stipulated Surrender of License is hereby respectfully submitted for
11 consideration by the Medical Board of California.

12 DATED: 1/10/2012

13 KAMALA D. HARRIS., Attorney General
14 of the State of California

15 
16 **JANE ZACK/SIMON**
17 Deputy Attorney General
18 Attorneys for Complainant

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Exhibit A

1 KAMALA D. HARRIS
Attorney General of California
2 JOSE R. GUERRERO
Supervising Deputy Attorney General
3 JANE ZACK SIMON
Deputy Attorney General [SBN 116564]
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7 *Attorneys for Complainant*
Medical Board of California

8
9 **BEFORE THE**
MEDICAL BOARD OF CALIFORNIA
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

13 **TERESA LEOLA JACKSON, M.D.,**
14 7063 N. Mission Hill Lane
Tucson, AZ 85718

15 Physician's and Surgeon's
16 Certificate No. A71589

17 Respondent.

Case No. 16-2011-218531

ACCUSATION

18
19 The Complainant alleges:

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21 1. Complainant Linda K. Whitney is the Executive Director of the Medical
22 Board of California, Department of Consumer Affairs, and brings this Accusation solely in her
23 official capacity.

24 2. On May 8, 2000, Physician's and Surgeon's Certificate No. A71589 was
25 issued by the Medical Board of California to Teresa Leola Jackson, M.D. (hereinafter
26 "respondent.") Said certificate will expire on March 31, 2012, but is SUSPENDED based on an
27 order issued on October 25, 2011 pursuant to Business and Professions Code section 2310(a.)

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JURISDICTION

3. This Accusation is brought before the Medical Board of California¹, (hereinafter the "Board") under the authority of the following sections of the California Business and Professions Code (hereinafter "Code") and/or other relevant statutory enactment:

A. Section 2227 of the Code provides in part that the Board may revoke, suspend for a period not to exceed one year, or place on probation, the license of any licensee who has been found guilty under the Medical Practice Act, and may recover the costs of probation monitoring.

B. Section 2305 of the Code provides, in part, that the revocation, suspension, or other discipline, restriction or limitation imposed by another state upon a license to practice medicine issued by that state, that would have been grounds for discipline in California under the Medical Practice Act, constitutes grounds for discipline for unprofessional conduct.

C. Section 141 of the Code provides:

“(a) For any licensee holding a license issued by a board under the jurisdiction of a department, a disciplinary action taken by another state, by any agency of the federal government, or by another country for any act substantially related to the practice regulated by the California license, may be ground for disciplinary action by the respective state licensing board. A certified copy of the record of the disciplinary action taken against the licensee by another state, an agency of the federal government, or by another country shall be conclusive evidence of the events related therein.

“(b) Nothing in this section shall preclude a board from applying a specific statutory provision in the licensing act administered by the board that provides for discipline based upon a disciplinary action taken against the licensee by another state, an agency of the federal government, or another country.”

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¹. The term "Board" means the Medical Board of California; "Division of Medical Quality" shall also be deemed to refer to the Board.

1 **FIRST CAUSE FOR DISCIPLINE**

2 (Discipline, Restriction, or Limitation Imposed by Another State)

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4 4. On October 6, 2011, the Arizona Medical Board issued an Order for

5 Decree of Censure, Practice Restriction and Probation and Consent to the Same (“Arizona

6 Order”) regarding respondent’s license to practice medicine in Arizona. The Arizona Order was

7 based on findings that respondent was summarily suspended by an Arizona hospital in 2010 due

8 to concerns about performing surgery while impaired. Biological fluid testing ordered by the

9 Arizona Board in 2010 was positive for benzodiazepines, lorazepam, nordazepam, oxazepam,

10 temazepam, and opiates. In May 2010, the Arizona Board issued an Interim Order for Practice

11 Limitation. A June 1, 2010 evaluation determined that respondent was not safe to practice

12 medicine, that she was at high risk for future relapse and dangerous use of substances, and

13 recommended treatment for substance abuse. On January 7, 2011, respondent was admitted to a

14 treatment center after being taken to a hospital after a suicide attempt. Respondent completed 30

15 days of inpatient treatment and then an additional 90 days of treatment, which was completed on

16 May 20, 2011. During her second course of treatment, respondent was placed on boundary and

17 behavioral contracts twice due to her noncompliance with the treatment process. The treatment

18 facility concluded that respondent was not safe to return to practice for a minimum of six months,

19 and recommend that respondent undergo an assessment by the Arizona Physician Health Program

20 (PHP.) The Arizona Board also found that respondent collected money from two patients for

21 surgical procedures which were never performed, and then refused to refund the patients’ money;

22 in August 2010 respondent filed for bankruptcy and the debts to her patients were discharged.

23

24 Based on these findings, the Arizona Board issued a Decree of Censure, and restricted

25 respondent’s license so that she shall not practice medicine and is prohibited from prescribing any

26 form of treatment including prescription medications for a period of at least six months. She may

27

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1 not return to practice until she is deemed safe to practice by the PHP Monitor. Respondent's
2 Arizona license was placed on probation for five years with requirements that she enroll in and
3 participate in the PHP and obtain a primary care physician to provide and coordinate all of her
4 medical care; she must abstain from drugs and alcohol and submit to biological fluid testing. A
5 copy of the Order for Decree of Censure, Practice Restriction and Probation and Consent to the
6 Same issued by the Arizona Medical Board is attached as Exhibit A.
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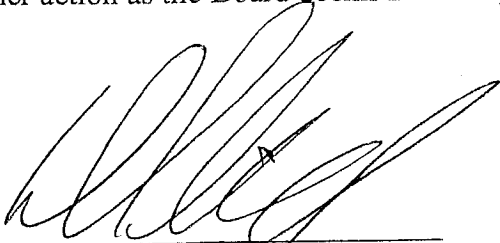
8 5. Respondent's conduct and the action of the Arizona Medical Board as set
9 forth in paragraph 4, above, constitute unprofessional conduct within the meaning of section 2305
10 and conduct subject to discipline within the meaning of section 141(a).

11 **PRAYER**

12 **WHEREFORE**, the complainant requests that a hearing be held on the matters
13 herein alleged, and that following the hearing, the Board issue a decision:

- 14 1. Revoking or suspending Physician's and Surgeon's Certificate Number
15 A71589 heretofore issued to respondent Teresa Leola Jackson, M.D.;
- 16 2. Revoking, suspending or denying approval of the respondent's authority to
17 supervise physician assistants;
- 18 3. Ordering respondent, if placed on probation, to pay the costs probation
19 monitoring; and
- 20 4. Taking such other and further action as the Board deems necessary and
21 proper.

22 DATED: November 23, 2011.

23
24 
25 **LINDA K. WHITNEY**
26 Executive Director
27 Medical Board of California
28 Department of Consumer Affairs
State of California

Complainant

Exhibit A

1 BEFORE THE ARIZONA MEDICAL BOARD

2 In the Matter of

3 **TERESA JACKSON, M.D.**

4 Holder of License No. 32627
5 For the Practice of Allopathic Medicine.
6 In the State of Arizona.

Case No. MD-10-0395A
MD-10-0884A

**ORDER FOR DECREE OF CENSURE,
PRACTICE RESTRICTION AND
PROBATION AND CONSENT TO THE
SAME**

7 Teresa Jackson, M.D. ("Respondent") elects to permanently waive any right to a
8 hearing and appeal with respect to this Order for Decree of Censure, Practice Restriction
9 and Probation; admits the jurisdiction of the Arizona Medical Board ("Board"); and
10 consents to the entry of this Order by the Board.

11 **FINDINGS OF FACT**

12 1. The Board is the duly constituted authority for the regulation and control of
13 the practice of allopathic medicine in the State of Arizona.

14 2. Respondent is the holder of license number 32627 for the practice of
15 allopathic medicine in the State of Arizona.

16 **Case No. MD-0395A**

17 3. The Board initiated case number MD-0395A after receiving notification that
18 on March 19, 2010, Northwest Medical Center summarily suspended Respondent for
19 concerns about performing surgery while impaired.

20 4. On March 22, 2010, Board staff interviewed Respondent and ordered her to
21 undergo biological fluid and hair testing. Respondent tested positive for benzodiazepines,
22 lorazepam, nordazepam, oxazepam and temazepam; her hair screen was positive for
23 opiates and benzodiazepines.

24 5. On March 24, 2010, Board staff ordered Respondent to undergo and
25 successfully complete an assessment within ten days. She presented for the assessment

1 on April 2, 2010; however, the report stated that she was unable to successfully complete
2 her evaluation at the evaluation facility and that further testing would be needed before a
3 recommendation for treatment could be made.

4 6. The evaluators determined that Respondent was not safe to practice
5 medicine and recommended that she not practice until she had undergone further testing
6 and work up. On May 12, 2010, the Board issued Respondent an Interim Order for
7 Practice Limitation.

8 7. On June 1, 2010, Respondent returned to the evaluation facility, where she
9 was diagnosed with drug and alcohol abuse. The evaluation facility found that
10 Respondent was at high risk for future relapse and dangerous use of substances. The
11 evaluation facility recommended that Respondent complete treatment for substance
12 abuse.

13 8. On January 7, 2011, Respondent was admitted to a treatment center after
14 being taken to a hospital post a suicide attempt. Respondent completed 30 days of
15 inpatient treatment and then an additional 90 days of treatment, which was completed on
16 May 20, 2011. During her second course of treatment, Respondent was placed on
17 boundary and behavioral contracts twice due to her noncompliance with the treatment
18 process. As a result, the treatment facility concluded that she was not safe to return to
19 practice for a minimum of six months. The facility also recommended that that she
20 undergo a reassessment by the Physician Health Program (PHP) Monitor. Final
21 recommendations included enrollment in PHP as well as psychotherapy and psychiatric
22 treatment.

23 9. A Medical Consultant ("MC") reviewed the care provided by Respondent on
24 the day that she was summarily suspended by the medical center. The MC found that the
25 overall care provided by Respondent to patient RG was within the standard of care for

1 breast reconstruction, but that there was no documentation in RG's records pertaining to a
2 discussion regarding other surgical options. In addition, Respondent documented that RG
3 had a prior tissue expander on the left breast, which was incorrect.

4 **Case No. MD-0884A**

5 10. The Board initiated case number MD-0884A after receiving a complaint from
6 a 51 year old female patient ("MK") alleging that Respondent collected monies from MK for
7 a surgery that was never performed.

8 11. On February 25, 2010, MK consulted with Respondent for an
9 abdominoplasty procedure. MK submitted a check in the amount of \$8,720 to Respondent
10 for payment of the surgery, which was cashed the following day. The surgery was
11 scheduled for May 24, 2010, and then cancelled by Respondent on May 14, 2010.
12 However, Respondent never performed the surgery and failed to refund MK's money.

13 12. The Board subsequently learned that Respondent had collected \$12,068
14 from one other patient for a procedure and failed to either perform the promised surgery or
15 refund the amount paid.

16 13. On August 17, 2010, Respondent filed for Chapter 7 bankruptcy and
17 eventually had her debts, including the amounts owed to her patients, discharged.

18 **CONCLUSIONS OF LAW**

19 1. The Board possesses jurisdiction over the subject matter hereof and over
20 Respondent.

21 2. The conduct and circumstances described above constitute unprofessional
22 conduct pursuant to A.R.S. § 32-1401(27)(e) ("[f]ailing or refusing to maintain adequate
23 records on a patient.").

24 3. The conduct and circumstances described above constitute unprofessional
25 conduct pursuant to A.R.S. § 32-1401(27)(f) ("[h]abitual intemperance in the use of alcohol
or habitual substance abuse.")

1 a private contractor. ("Monitor").

2 2. Relapse Prevention Group. Respondent shall attend the Monitor's relapse
3 prevention group therapy sessions one time per week for the duration of this Order, unless
4 excused by the relapse prevention group facilitator for good cause. Individual relapse
5 therapy may be substituted for one or more of the group therapy sessions, if Monitor pre-
6 approves substitution. The relapse prevention group facilitators or individual relapse
7 prevention therapist shall submit monthly reports to the Monitor regarding attendance and
8 progress.

9 3. 12 Step or Self-Help Group Meetings. If applicable, Respondent shall
10 attend ninety 12-step meetings or other self-help group meetings appropriate for
11 substance abuse and approved by the Monitor, for a period of ninety days. Upon
12 completion of the ninety meetings in ninety days, Respondent shall participate in a 12-step
13 recovery program or other self-help program appropriate for substance abuse as
14 recommended by the Monitor. Respondent shall attend a minimum of three 12-step or
15 other self-help program meetings per week. Two meetings per month must be Caduceus
16 meetings. Respondent must maintain a log of all self-help meetings.

17 4. Approved Primary Care Physician. Respondent shall promptly obtain a
18 primary care physician and shall submit the name of the physician to the Monitor in writing
19 for approval. The approved primary care physician ("PCP") shall be in charge of providing
20 and coordinating Respondent's medical care and treatment. Except in an *Emergency*,
21 Respondent shall obtain medical care and treatment only from the PCP and from health
22 care providers to whom the PCP refers Respondent. Respondent shall promptly provide
23 a copy of this Order to the PCP. Respondent shall also inform all other health care
24 providers who provide medical care or treatment that Respondent is participating in PHP.
25 "*Emergency*" means a serious accident or sudden illness that, if not treated immediately,

1 may result in a long-term medical problem or loss of life.

2 5. **Medication.** Except in an *Emergency*, Respondent shall take no *Medication*
3 unless the PCP or other health care provider to whom the PCP refers Respondent
4 prescribes the *Medication*. Respondent shall not self-prescribe any *Medication*.
5 "*Medication*" means a prescription-only drug, controlled substance, and over-the counter
6 preparation, other than plain aspirin, plain ibuprofen, and plain acetaminophen. If a
7 controlled substance is prescribed, dispensed, or administered to Respondent by any
8 person other than PCP, Respondent shall notify the PCP in writing within 48 hours and
9 notify the Monitor immediately.

10 6. **No Alcohol or Poppy Seeds.** Respondent shall not consume alcohol, any
11 food, or other substance containing poppy seeds or alcohol.

12 7. **Biological Fluid Collection.** Respondent shall provide the Monitor in
13 writing with one telephone number that shall be used to contact Respondent on a 24 hour
14 per day/seven day per week basis to submit to biological fluid collection. For the purposes
15 of this section, telephonic notice shall be deemed given at the time a message to appear is
16 left at the contact telephone number provided by Respondent. Respondent authorizes any
17 person or organization conducting tests on the collected samples to provide testing results
18 to the Monitor. Respondent shall comply with all requirements for biological fluid
19 collection.

20 8. **Out of State Travel and/or Unavailability at Home/Office Telephone**
21 **Number.** Respondent shall provide the Monitor with written notice of any plans to travel
22 out of state.

23 9. **Payment for Services.** Respondent shall pay for all costs, including Monitor
24 costs associated with participating in PHP at the time service is rendered, or within 30
25 days of each invoice sent to the Respondent. An initial deposit of two months monitoring

1 fees is due upon entering the program. Failure to pay either the initial monitoring deposit
2 or monthly fees 60 days after invoicing will be reported to the Board by the contractor and
3 may result in disciplinary action up to and including revocation.

4 10. Interviews. Respondent shall appear in person before the Monitor for
5 interviews upon request, upon reasonable notice.

6 11. Address and Phone Changes, Notice. Respondent shall immediately notify
7 the Monitor in writing of any change in office or home addresses and telephone numbers.

8 12. Relapse, Violation. In the event of chemical dependency relapse by
9 Respondent or Respondent's use of drugs or alcohol in violation of the Order, Respondent
10 shall promptly enter into an Interim Order for Practice Restriction and Consent to the
11 Same that requires, among other things, that Respondent not practice medicine until such
12 time as Respondent successfully completes long-term inpatient treatment for chemical
13 dependency designated by the Monitor and obtains affirmative approval from the Board or
14 the Executive Director to return to the practice of medicine. Prior to approving
15 Respondent's request to return to the practice of medicine, Respondent may be required
16 to submit to witnessed biological fluid collection or undergo any combination of physical
17 examination, psychiatric or psychological evaluation. **In no respect shall the terms of**
18 **this paragraph restrict the Board's authority to initiate and take disciplinary action**
19 **for violation of this Order.**

20 13. Notice Requirements. Respondent shall immediately provide a copy of this
21 Order to all current and future employers and all hospitals and free standing surgery
22 centers where Respondent has privileges. Within 30 days of the date of this Order,
23 Respondent shall provide the Monitor with a signed statement of compliance with this
24 notification requirement. Respondent is further required to notify, in writing, all employers,
25 hospitals and free standing surgery centers where Respondent currently has or in the

1 future gains employment or privileges, of a chemical dependency relapse..

2 14. Out-of-State. In the event Respondent resides or practices as a physician
3 in a state other than Arizona, Respondent shall participate in the rehabilitation program
4 sponsored by that state's medical licensing authority or medical society. Respondent shall
5 cause the monitoring state's program to provide written quarterly reports to the Monitor
6 regarding Respondent's attendance, participation, and monitoring. The monitoring state's
7 program and Respondent shall immediately notify the Monitor if Respondent: a) is non-
8 compliant with any aspect of the monitoring requirements; b) relapses; c) tests positive for
9 controlled substances; d) has low specific gravity urine drug test(s), missed and/or late
10 urine drug tests, or otherwise rejected urine drug tests; and e) is required to undergo any
11 additional treatment.

12 15. Respondent shall immediately obtain a treating psychiatrist and
13 psychotherapist approved by the Monitor and shall remain in treatment with the
14 psychiatrist and psychotherapist until further order. Respondent shall instruct the
15 psychiatrist and psychotherapist to release to the Monitor, upon request, all records
16 relating to Respondent's treatment, and to submit quarterly written reports to the Monitor
17 regarding diagnosis, prognosis, medications, and recommendations for continuing care
18 and treatment of Respondent. Respondent shall provide the psychiatrist and
19 psychotherapist with a copy of this order. Respondent shall pay the expenses of all the
20 psychiatric and psychotherapeutic care and for the preparation of the quarterly reports.
21 After **twelve months**, Respondent may submit a written request to the Monitor requesting
22 termination of the requirement that Respondent remain in treatment with a psychiatrist and
23 psychotherapist. The decision to terminate will be based, in part, upon the treating
24 psychiatrist's and psychotherapist's recommendations for continued care and treatment.

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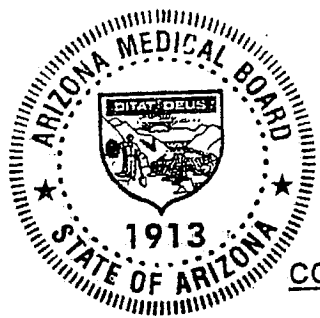
1 16. This Order supersedes all previous consent agreements and stipulations
2 between the Board and/or the Executive Director and Respondent.

3 17. The Board retains jurisdiction and may initiate new action based upon any
4 violation of this Order.

5 DATED AND EFFECTIVE this 17th day of October, 2011.

6 ARIZONA MEDICAL BOARD

7 (SEAL)



8 By [Signature]
9 Lisa S. Wynn
10 Executive Director

11 CONSENT TO ENTRY OF ORDER

12 1. Respondent has read and understands this Consent Agreement and the
13 stipulated Findings of Fact, Conclusions of Law and Order ("Order"). Respondent
14 acknowledges she has the right to consult with legal counsel regarding this matter.

15 2. Respondent acknowledges and agrees that this Order is entered into freely
16 and voluntarily and that no promise was made or coercion used to induce such entry.

17 3. By consenting to this Order, Respondent voluntarily relinquishes any rights to
18 a hearing or judicial review in state or federal court on the matters alleged, or to challenge
19 this Order in its entirety as issued by the Board, and waives any other cause of action
20 related thereto or arising from said Order.

21 4. The Order is not effective until approved by the Board and signed by its
22 Executive Director.

23 5. All admissions made by Respondent are solely for final disposition of this
24 matter and any subsequent related administrative proceedings or civil litigation involving
25 the Board and Respondent. Therefore, said admissions by Respondent are not intended
or made for any other use, such as in the context of another state or federal government

1 regulatory agency proceeding, civil or criminal court proceeding, in the State of Arizona or
2 any other state or federal court.

3 6. Upon signing this agreement, and returning this document (or a copy thereof)
4 to the Board's Executive Director, Respondent may not revoke the consent to the entry of
5 the Order. Respondent may not make any modifications to the document. Any
6 modifications to this original document are ineffective and void unless mutually approved
7 by the parties.

8 7. This Order is a public record that will be publicly disseminated as a formal
9 disciplinary action of the Board and will be reported to the National Practitioner's Data
10 Bank and on the Board's web site as a disciplinary action.


11 8. If any part of the Order is later declared void or otherwise unenforceable, the
12 remainder of the Order in its entirety shall remain in force and effect.

13 9. If the Board does not adopt this Order, Respondent will not assert as a
14 defense that the Board's consideration of the Order constitutes bias, prejudice,
15 prejudgment or other similar defense.

16 10. Any violation of this Order constitutes unprofessional conduct and may result
17 in disciplinary action. A.R.S. § § 32-1401(27)(r) ("[v]iolating a formal order, probation,
18 consent agreement or stipulation issued or entered into by the board or its executive
19 director under this chapter") and 32-1451.

20 11. *Respondent has read and understands the conditions of probation.*

21

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23 Teresa Jackson, M.D.

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DATED: 9/2/11


25 EXECUTED COPY of the foregoing mailed
this 2nd day of Oct, 2011 to:

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Teresa Jackson, M.D.
Address of Record

ORIGINAL of the foregoing filed
this 19 day of October, 2011 with:

Arizona Medical Board
9545 E. Doubletree Ranch Road
Scottsdale, AZ 85258


Arizona Medical Board Staff