

1 2.2 Licensee diagnosed Patient A as having lead toxicity on or about January 5, 1998,
2 and treated her with chelating agents. He failed to conduct a physical examination. Patient A later
3 expressed interest in detoxification for aluminum. Licensee began the patient on a treatment plan
4 consisting of deferoxamine.

5 2.3 Licensee diagnosed Patient B's condition as seizure disorder with metal toxicity for
6 aluminum, cadmium and silver. Licensee did not conduct a physical examination and did not order
7 any laboratory testing other than hair analysis. Licensee recommended treatment with
8 deferoxamine for toxicity.

9 2.4 Patient C was diagnosed with lead toxicity based on hair analysis and generalized
10 non-specific complaints. He underwent chelation therapy. No blood or urine specimens were
11 obtained or analyzed.

12 2.5 Patient D was diagnosed with arsenic toxicity. The patient chart reflects that
13 Licensee did not conduct a physical examination. Neither were blood and urine specimens
14 obtained or analyzed.

15 2.6 Patient E presented a history of dizziness. The patient chart reflects that an MRI
16 and other tests were normal. No blood or urine testing was performed. Licensee diagnosed
17 Patient E as suffering from parasites and mercury toxicity. No physical examination was
18 documented. A pre-chelation urine challenge for mercury was zero. The post-chelation mercury
19 challenge was also zero.

20 2.7 Patient F began treatment with Licensee on or about January 12, 1998, with
21 complaints of headache, fluid retention, nausea, insomnia, confusion, memory loss and dry mouth.
22 Patient F was evaluated by a naturopath and was told he was lead toxic and underwent a single
23 dose of EDTA therapy. Licensee examined Patient F and informed him that he suffered from lead
24 toxicity with liver function abnormalities and possible activation of Hepatitis C. He also noted a
25 concern of congestive heart failure. The diagnosis was made without confirmatory laboratory
26 work. Licensee treated Patient F with chelation therapy on repeated occasions. A toxicologist

1 reported in May of 1998, that Patient F's Hepatitis C was again active, accounting for his increased
2 liver function. He was referred to a gastroenterologist for treatment.

3 3.

4 Licensee and the Board desire to settle this matter by the entry of this Stipulated Order.
5 Licensee understands that he has the right to a contested case hearing under the Administrative
6 Procedures Act (Chapter 183) Revised Statutes and Oregon fully and finally waives the right to a
7 contested case hearing and any appeal therefrom by the signing of and entry of this Order in the
8 Board's records. Licensee does not contest that he engaged in the conduct described in
9 paragraph 2 and that this conduct violates ORS 677.190(1)(a) unprofessional or dishonorable
10 conduct, as defined in ORS 677 188(4)(a) and ORS 677.190(14) gross or repeated acts of
11 negligence in the practice of medicine.

12 4.

13 Licensee and the Board agree to resolve this matter by the entry of this Stipulated Order
14 subject to the following conditions:

15 4.1 Licensee is reprimanded.

16 4.2 Licensee is placed on probation for five years, beginning with the signing of this
17 Order.

18 4.3 Licensee shall report in person to the Board at each of its quarterly meetings at the
19 scheduled times for a probationer interview, unless otherwise directed by the Board.

20 4.4 Licensee will conduct an appropriate examination of all patients that he sees prior to
21 diagnosis or treatment, with appropriate chart entries.

22 4.5 During the period of probation, Licensee will not treat or diagnose patients with
23 chelation therapy or a chelation challenge; neither will he order chelation therapy for any patient.

24 4.6 Licensee will provide a report to the Board's Compliance Officer on the first of
25 every month, beginning on August 1, 2000, listing every patient that he has diagnosed or treated in
26 the preceding month for heavy metal toxicity. (No report is necessary if no such diagnosis or

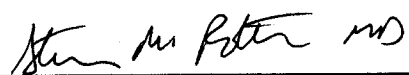
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3 - **STIPULATED ORDER (STEVEN MARK ROTTER, M.D.)**


1 treatment occurs in the preceding month). The patient records pertaining to these patients will be
2 subject to inspection by the Board's Compliance Officer or Investigation Committee upon request.

3 4.7 Licensee stipulates and agrees that any violation of the terms of this Order shall be
4 grounds for further disciplinary action under ORS 677.190(18).

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6 IT IS SO STIPULATED this 30th day of June, 2000.

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9 _____
10 Steven M. Rotter, M.D.

11 IT IS SO ORDERED this 2nd day of August, 2000.

12 BOARD OF MEDICAL EXAMINERS
13 State of Oregon.
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16 ERIK W. NIELSEN, M.D.
17 Chairman of the Board
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