

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT
for the

Southern District of West Virginia

United States of America)

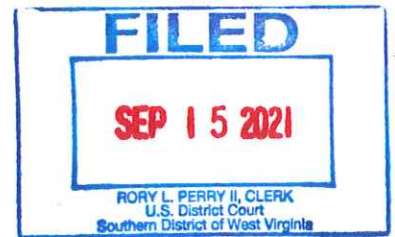
v.)

Case No.)

ALEXANDER OTELLIN, M.D.)

2:21-mj-00166)

Defendant(s)



CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 3/19/2019 through 8/1/2019 in the county of Kanawha in the
Southern District of West Virginia, the defendant(s) violated:

Code Section

21 U.S.C. § 841(a)(1)

Offense Description

Distribution of amphetamine salts (Adderal) and alprazolam (Xanax),
Schedule II and Schedule IV Controlled Substances.

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Complainant's signature

R. Brian Dotson, DEA-TFO

Printed name and title

Sworn telephonically (reliable electronic means) by me.

Date: 09/15/2021

Judge's signature

City and state: Charleston, West Virginia

Dwane L. Tinsley, United States Magistrate Judge

Printed name and title

A F F I D A V I T

STATE OF WEST VIRGINIA

COUNTY OF KANAWHA, to-wit:

I, DEA Task Force Officer ("TFO") R. Brian Dotson, being first duly sworn, do hereby depose and state as follows:

1. I am a Task Force Officer (TFO) with the Drug Enforcement Administration (DEA) and have been so since July 2012. As such, I am an "investigative or law enforcement officer" of the United States within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States empowered by law to conduct criminal investigations and make arrests for offenses enumerated in 18 U.S.C. § 2516.

2. I am currently assigned to the Charleston, West Virginia District Office of the DEA and have been since July 2012. I have been employed by the Boone County Sheriff's Office in Boone County, West Virginia since January 2009, and I am currently deputized and assigned to the DEA in Charleston, WV.

3. I am presently assigned to the Tactical Diversion Squad in Charleston, West Virginia, which assists in the prevention, detection, and investigation of the diversion of controlled pharmaceuticals and listed chemicals from legitimate sources. I have participated in both criminal and diversion investigations. I have participated in the execution of numerous search warrants

at the residences and businesses of narcotics traffickers, safe houses, and crack houses, and have participated in numerous arrests for drug related offenses. I have also participated in investigations targeting individuals and organizations trafficking heroin, cocaine, cocaine base, marijuana, methamphetamine, and other controlled substances, as defined in 21 U.S.C. § 801.

4. I have experience investigating individuals and organizations that illegally distribute and dispense controlled substances under the guise of operating seemingly legitimate medical clinics, colloquially known as "pill mills." These "pill mills" often operate as pain management clinics or general medical practices. Typically, an individual who seeks to abuse or illegally divert controlled substances will go to one of these medical clinics. By necessity, all "pill mills" employ medical practitioners, often physicians, who are licensed by the DEA to prescribe controlled substances. The physician at the medical clinic issues a prescription for a controlled substance, often without performing the minimal, professionally required medical assessment of the patient's complaints, and/or without properly evaluating whether prescribing or dispensing the controlled substances is medically appropriate.

Probable Cause

5. This investigation involves Dr. Alexander Otellin, M.D. ("OTELLIN"), a psychiatrist, unlawfully distributing Schedule II,

III, and IV controlled substances, including oxycodone, suboxone, amphetamine, and alprazolam outside the usual course of accepted medical practice and not for a legitimate medical purpose, in violation of 21 U.S.C. § 841, in Kanawha County in the Southern District of West Virginia.

6. Beginning in January 2018, the DEA began receiving information from pharmacists in Kanawha County that OTELLIN's prescribing practices were suspicious due to OTELLIN's prescribing of unusually high amounts of buprenorphine. This was especially concerning to the DEA because OTELLIN's area of expertise is psychiatry. The United States consulted with medical expert Donald Sullivan, Ph.D., a Professor of Pharmacy Practice at Ohio State University. Dr. Sullivan reviewed OTELLIN's prescribing through his Controlled Substance Monitoring Program ("CSMP") data from January 1, 2017, to June 1, 2020. He noted concerning and problematic prescribing patterns throughout OTELLIN's practice, including OTELLIN's practice of prescribing combinations of opioids and benzodiazepines in contradiction to current Center for Disease Control guidelines; his high doses of zolpidem; and instances of prescribing more than twice the recommended dose of dextroamphetamine. From October 2, 2017, to March 27, 2020, OTELLIN prescribed 21,196 prescriptions for opioids and other controlled substances.

7. Close in time to the DEA investigation into OTELLIN, the West Virginia Board of Medicine ("WVBOM") also began receiving complaints regarding OTELLIN's prescribing practices. These complaints lead to the opening of an investigation by the WVBOM, ultimately resulting in the entry of a Consent Order in September 2019 by the WVBOM and OTELLIN due to his pattern of prescribing controlled substances.¹ The Consent Order placed OTELLIN's West Virginia medical license in probationary status for a period of three years, from 2019 until 2022. The Order further subjects OTELLIN to medical record and prescribing audits during the probationary period and requires OTELLIN to enroll in and successfully complete an intensive course in proper controlled substance prescribing.

8. As part of the WVBOM's investigation into OTELLIN's prescribing practices, it engaged Dr. Jerome D. Massenburg, M.D., an independent physician, to provide a review of patient medical records and prescribing records for ten of OTELLIN's patients, including patient V.A. Dr. Massenburg ultimately concluded that OTELLIN engaged in improper over-prescribing to three of the patients Dr. Massenburg reviewed files for, including patient V.A.

9. Patient V.A. began seeing OTELLIN in 2014, when V.A. was diagnosed with bipolar disorder, generalized anxiety disorder, and

¹A true and accurate copy of the Consent Order is attached here as Exhibit A.

breathing-related sleep disorder. Dr. Massenburg concluded that OTELLIN's prescribing to V.A. often exceeded the recommended pharmaceutical and therapeutic guidelines.

10. Investigators further learned that, between approximately November 15, 2018 through April 2019, V.A. was on probation in Kanawha County, West Virginia. According to records received by the DEA, V.A. was being supervised by Probation Officer Trevor Caldwell, with the Adult Probation Department of the Thirteenth Judicial Circuit Court in Kanawha County, West Virginia, pursuant to a sentence of two-years' probation imposed by the Circuit Court of Kanawha County. Records do not indicate what V.A. was convicted of. During that time period, patient V.A. admitted to Officer Caldwell that he was exchanging the medications prescribed to him by OTELLIN for methamphetamine and failed multiple urine drug screens as a result of testing positive for methamphetamine. OTELLIN continued to prescribe controlled substances to V.A. during this time period, including dextroamphetamine (a Schedule II controlled substance), alprazolam (a Schedule IV controlled substance), zolpidem (a Schedule IV controlled substance), and diazepam (a Schedule IV controlled substance).

11. On January 16, 2019, and February 13, 2019, Probation Officer Caldwell informed OTELLIN in writing that he was concerned as to V.A.'s use of multiple medications, and that V.A. had been

dishonest with Officer Caldwell about the medicines OTELLIN was prescribing. Officer Caldwell specifically noted his concern that V.A. was misusing his medications and asked OTELLIN to review V.A.'s medications during V.A.'s next visit. Upon OTELLIN's request, Officer Caldwell faxed OTELLIN urine drug screen results demonstrating that V.A. tested positive for methamphetamine on November 14, 2018, November 28, 2018, and January 14, 2019. Despite these notifications from Probation Officer Caldwell, and after being informed that V.A. was exchanging his benzodiazepine prescriptions for methamphetamine, OTELLIN prescribed V.A. alprazolam during a visit on March 19, 2019.

12. On August 1, 2019, OTELLIN prescribed V.A. the controlled substances amphetamine salts, alprazolam, and zolpidem. Three days later, on August 4, 2019, V.A. passed away. According to the Certificate of Death issued by the West Virginia Department of Health and Human Resources, V.A.'s death was caused by his combined fentanyl, alprazolam, and diazepam intoxication. V.A.'s wife sent OTELLIN a card thanking him for attending V.A.'s funeral and stating that OTELLIN helped V.A. a lot. However, during an interview with DEA agents on January 13, 2021, V.A.'s wife noted that, while V.A. was happy with the care provided by OTELLIN, she was not. V.A.'s wife stated that V.A. was prescribed too many medications and was "like a zombie all the time." Over a month

later, on September 9, 2019, OTELLIN entered the Consent Order with the WVBOM referenced above.

13. Based on this information, on July 16, 2020, the DEA secured a search and seizure warrant for the electronic medical records ("EMR") maintained by OTELLIN's practice. The DEA sent EMR for sixteen of OTELLIN's patients, along with their prescribing information and the prescribing information of OTELLIN, to Gregory Kyser, M.D. Dr. Kyser has been a psychiatrist since 1991 and is board certified in psychiatry, and as such was selected to review OTELLIN's patient files based on the common practice area. Dr. Kyser reviewed the EMR and prescribing data for patients V.A., T.C., D.B., K.P., and S.P. Like Dr. Massenburg, Dr. Kyser concluded that OTELLIN's prescribing was problematic, specifically his practice of combining opioids and benzodiazepines for several of his patients. Dr. Kyser concluded that OTELLIN's treatment for those five patients, including his prescribing of controlled substances for those five patients, was not done for a legitimate medical purpose and was outside the usual course of professional practice.

14. As to V.A., Dr. Kyser concluded that OTELLIN dangerously prescribed multiple benzodiazepines at the same time. Concerning T.C., Dr. Kyser concluded that OTELLIN consistently combined benzodiazepines with exceptionally high doses of Suboxone. For D.B., Dr. Kyser concluded that OTELLIN dangerously prescribed

mixtures of hydrocodone, alprazolam, and gabapentin with no clear, noted reason in D.B.'s chart for doing so. Finally, for both K.P. and S.P., a married couple, Dr. Kyser concluded that OTELLIN dangerously prescribed both patients a very high dose of oxycodone combined with benzodiazepines with no legitimate reason to do so.

15. Based on the information found during the investigation and the conclusions of Dr. Kyser, the DEA executed a search and seizure warrant on August 31, 2021 on the premises of OTELLIN's practice: 401 Division Street, Suite 307 South Charleston, WV 25309. DEA Agents made copies of files for 53 patients, the majority of which were the same patients whose EMR files had previously been obtained and reviewed by Dr. Kyser. DEA Agents also searched the office for any other evidence of distribution of controlled substances in violation of 21 U.S.C. § 841. The files seized and copied during the execution of that search warrant were provided to Dr. Kyser to supplement what he already received from the EMR data seized; his conclusions as to OTELLIN's prescribing practices were not changed based on this evidence at this time.

16. As of drafting of this complaint, investigators have determined that OTELLIN has returned to his home country of Russia and remains there. However, investigators have also determined that OTELLIN continues to practice telehealth from Russia for his patients in southern West Virginia.

17. Based on my knowledge, training, and experience, and the aforementioned information set forth in this affidavit, OTELLIN unlawfully distributed controlled substances in violation of 21 U.S.C. § 841(a)(1) by prescribing the controlled substances outside the usual course of accepted medical practice and not for a legitimate medical purpose. This is supported by a combination of, among other things, the Consent Order entered into by OTELLIN and the WVBOM based on the WVBOM's investigation; the prescribing evidence obtained by the DEA; the cause of death of V.A. determined by the West Virginia Office of the Chief Medical Examiner; and the expert medical opinions of Dr. Massenburg, Dr. Sullivan, and Dr. Kyser.

18. Based on the information set forth in this affidavit, your affiant hereby requests that an arrest warrant for Alexander OTELLIN, M.D., be issued.

Further you affiant sayeth naught.



DEA TFO R. Brian Dotson

Sworn to by the affiant telephonically in accordance with the procedures of Rule 4.1, this 15th day of September, 2021



DWANE L. TINSLEY
UNITED STATES MAGISTRATE JUDGE

EXHIBIT A

BEFORE THE WEST VIRGINIA BOARD OF MEDICINE

IN RE:

ALEXANDER VLADIMIROVICH OTELLIN, MD

Complaint No. 18-81-W

CONSENT ORDER

The West Virginia Board of Medicine (the "Board") and Alexander Vladimirovich Otellin, MD ("Dr. Otellin"), freely and voluntarily enter into the following Consent Order pursuant to West Virginia Code § 30-3-14, *et seq.*

FINDINGS OF FACT

The Board and Dr. Otellin stipulate to the truthfulness and accuracy of the facts, as set forth herein below:

1. Dr. Otellin holds a West Virginia medical license, License No. 22592, which was first issued in 2006. Dr. Otellin's address of record with the Board is in Charleston, West Virginia.
2. Dr. Otellin's self-identified area of specialty is psychiatry.
3. On May 6, 2018, the Complaint Committee of the Board authorized Initiated Complaint No. 18-81-W to investigate allegations of professional misconduct against Dr. Otellin based upon an anonymous written report to the Board raising concerns regarding Dr. Otellin's prescribing practices.
4. The Complaint Committee conducted an investigation into the allegations set forth in Initiated Complaint No. 18-81-W and obtained an independent physician review of patient medical records and prescribing records for ten patients of Dr. Otellin.

Consent Order
Alexander Vladimirovich Otellin, MD
Page 2 of 10

5. The independent reviewer identified concerns with Dr. Otellin's treatment plans, medical documentation, controlled substance prescribing practices and compliance monitoring of patients.

6. Dr. Otellin disputes the conclusions rendered by the independent physician.

7. The Board and Dr. Otellin voluntarily enter into this Consent Order to resolve Complaint No. 18-81-W, and to establish appropriate terms and conditions upon Dr. Otellin's practice of medicine in West Virginia.

8. This Consent Order relates solely to Complaint No. 18-81-W and does not relate to or resolve any other matters that may be pending before the Board.

CONCLUSIONS OF LAW

The Board and Dr. Otellin stipulate to the following conclusions of law:

1. Dr. Otellin's license to practice medicine and surgery in the state of West Virginia is subject to regulation and discipline by the West Virginia Board of Medicine, the "regulatory and disciplinary body for the practice of medicine and surgery" for physicians, podiatrists and physician assistants in West Virginia. W.Va. Code § 30-3-5 and § 30-3-7(a).

2. The Board has a mandate to ensure "a professional environment that encourages the delivery of quality medical services" to protect the public interest. W.Va. Code § 30-3-2.

3. The West Virginia Medical Practice Act sets forth conduct which may render an individual unqualified for licensure or subject to discipline or other restrictions upon licensure. W.Va. Code § 30-3-14. Pursuant to W.Va. Code § 30-1-8(c), the Board has promulgated legislative rules that "delineate conduct, practices or acts which, in the judgment of the board, constitute professional negligence, a willful departure from accepted standards of professional

Consent Order
Alexander Vladimirovich Otellin, MD
Page 3 of 10

conduct and/or which may render an individual unqualified or unfit for licensure, registration or other authorization to practice.” W. Va. Code R. § 11-1A-12.

4. Probable cause may exist to substantiate disciplinary charges against Dr. Otellin pursuant to the West Virginia Medical Practice Act and the Board’s legislative rules including, but not limited to, the following provisions:

- a. W. Va. Code § 30-3-14(c)(17), W. Va. Code R. § 11-1A-12.1.e and 12.1.j, and W. Va. Code R. § 11-1A-12.2.d, relating to dishonorable, unethical or unprofessional conduct; and/or
- b. W. Va. Code § 30-3-14(c)(17) and/or W. Va. Code R. § 11-1A-12.1.x, relating to engaging in malpractice or the failure to practice medicine with that level of care, skill and treatment which is recognized by a reasonable, prudent, physician engaged in the same or a similar specialty as being acceptable under similar conditions and circumstances; and/or
- c. W. Va. Code § 30-3-14(c)(13) and W. Va. Code R. § 11-1A-12.2.a, relating to prescribing a controlled substance other than in good faith and in a therapeutic manner in accordance with accepted medical standards and in the course of the physician's professional practice.

5. With respects to Complaint No. 18-81-W, it is appropriate and in the public interest to waive the commencement of proceedings against Dr. Otellin and to proceed without the filing of charges, or a formal Complaint and Notice of Hearing, subject to compliance by Dr. Otellin with the provisions of this Consent Order.

Consent Order
Alexander Vladimirovich Otellin, MD
Page 4 of 10

6. This Consent Order sets forth reasonable, appropriate and necessary terms, conditions, limitations and restrictions upon the practice of medicine and surgery by Dr. Otellin in West Virginia.

7. This Consent Order relates solely to Complaint No. 18-81-W, and does not relate to or resolve any other matters that may be pending before the Board.

CONSENT

By signing his name to this Consent Order, Alexander Vladimirovich Otellin, MD, acknowledges that he understands and agrees with the following:

1. Dr. Otellin has read and understands this entire Consent Order;
2. Dr. Otellin agrees that he has been given adequate time and opportunity to review and consider the terms set forth in this Consent Order;
3. Dr. Otellin understands that he has the right to legal representation in this matter, at his own expense, and agrees that he has exercised this right, and has been afforded adequate time and opportunity to consult with his counsel regarding the legal effect of this Consent Order;
4. Dr. Otellin understands that this Consent Order is a legally binding Order of the West Virginia Board of Medicine that affects his rights and privileges;
5. Dr. Otellin acknowledges that he is fully aware that, without his consent, no permanent legal action may be taken against him except after a hearing held in accordance with West Virginia Code § 30-3-14(h) and § 29A-5-1, *et seq.*;
6. Dr. Otellin is aware of his legal rights in this matter, in addition to his right to be represented by counsel at his own expense, including: the right to a formal hearing, after reasonable notice, before the West Virginia Board of Medicine on the disciplinary charges before the Board;

Consent Order
Alexander Vladimirovich Otellin, MD
Page 5 of 10

the right to confront and cross-examine witnesses against him; the right to present evidence and testify on his own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to appeal under Chapter 29A of the West Virginia Code in the event of a final order or decision adverse to him;

7. With the exception of his right to counsel, which he has exercised, Dr. Otellin knowingly and voluntarily waives all such additional rights, and agrees to the entry of this Consent Order relative to his practice of medicine in the state of West Virginia;

8. Dr. Otellin acknowledges that if he violates any of the terms of this Consent Order, further action may be taken against his license by the Board, as permitted by law; and

9. Dr. Otellin understands that this Consent Order relates only to Complaint No. 18-81-W and does not relate to or resolve any other matters that may be pending before the Board.

10. Dr. Otellin understands that this Order is a public document which will be available for public inspection, will be accessible through the Board's website, and will be a permanent part of his historical file with the Board. Matters contained herein will be reported to the National Practitioner Data Bank, and may be reported to other jurisdictions, the Federation of State Medical Boards and as otherwise required by law.

ORDER

WHEREFORE, on the basis of the foregoing stipulated Findings of Fact and Conclusions of Law, and with the consent of Dr. Otellin, the West Virginia Board of Medicine hereby **ORDERS** as follows:

1. Effective upon entry of this Consent Order, Dr. Otellin's West Virginia medical license, License No. 22592, is placed in **PROBATIONARY STATUS** for a period of three (3)

Consent Order
Alexander Vladimirovich Otellin, MD
Page 6 of 10

years. During Dr. Otellin's period of probation, he must comport his practice of medicine and surgery in the State of West Virginia with the following probationary terms, conditions, limitations and restrictions as set forth herein below:

- a. *Medical Record and Prescribing Audit.* In each of the next three calendar years (2020, 2021 and 2022), and without prior notice to Dr. Otellin, the Board shall conduct a chart review of Dr. Otellin's medical records. Upon request, Dr. Otellin shall immediately provide the Board's Investigator with on-site access to all of his medical records/charts for active patients. Upon request, Dr. Otellin shall also produce a complete and legible copy of up to ten medical records/charts selected by the Board's Investigator for off-site review by the Board within five business days of such request. Further, during Dr. Otellin's period of probation, the Board may, in its discretion and at any time, query Dr. Otellin's controlled substance prescribing practices with the West Virginia Board of Pharmacy's Controlled Substance Monitoring Database ("CSMP") and/or similar state or federal entities in surrounding states to monitor Dr. Otellin's prescribing practices. The Board may also query Dr. Otellin's utilization of the CSMP to monitor his compliance with W. Va. Code §60A-9-5a at any time during his probationary period.
- b. *Training and Education.* At his own expense, Dr. Otellin shall enroll in and successfully complete **Case Western Reserve University's Intensive Course in Controlled Substance Prescribing – Pain, Anxiety,**

Consent Order
Alexander Vladimirovich Otellin, MD
Page 7 of 10

Insomnia, including all pre-course and post-course requirements. To satisfy this requirement, Dr. Otellin must complete all pre-course requirements and attend and successfully complete this course on **November 11-13, 2019 in Cleveland, Ohio.**

- c. *Notification of Enrollment.* Dr. Otellin shall provide the Board with a copy of his enrollment confirmation from the CME provider on or before **September 25, 2019**, and he shall submit acceptable documentation from the CME provider of his successful completion of the course to the Board within **ten days** of his completion of the course.
- d. *Successful Completion of CME.* Successful completion of the CME course required by this Order shall be determined solely by the CME provider. A determination by the CME provider that Dr. Otellin has failed to successfully complete any program requirement, including pre or post program requirements, shall constitute clear and convincing evidence for the Board to take further action with respect to Dr. Otellin's West Virginia medical license, including the imposition of additional discipline.
- e. *Limitation on Use of CME hours.* Dr. Otellin may not utilize any CME hours he earns pursuant to his participation in the CME course required by this Order to satisfy his biennial continuing medical education obligation pursuant to W. Va. Code R. §11-6-3.1 or any superseding enactment of the Board's legislative rule governing continuing medical education requirements and reporting for physicians.

Consent Order
Alexander Vladimirovich Otellin, MD
Page 8 of 10

- f. *Notice of Interruption in Practice.* Dr. Otellin shall notify the Board, in writing, of all periods of time exceeding thirty calendar days in duration during which he is not actively practicing medicine in West Virginia. Dr. Otellin shall provide advance notice for all scheduled periods of non-practice and shall notify the Board no later than five days after the conclusion of any unanticipated or unscheduled periods.
- g. *Tolling.* The terms of this Consent Order, including but not limited to the period of probation, shall be tolled for any period of time during which Dr. Otellin is not actively practicing medicine in West Virginia.

2. At the end of Dr. Otellin's period of probation, Dr. Otellin may petition the Board to lift the period of probation set forth herein, and to modify and/or lift the practice restrictions related thereto which are imposed by this Order.

3. Dr. Otellin shall at all times fully comply with all of the professional practice requirements of the West Virginia Medical Practice Act as set forth in W. Va. Code § 30-3-1 *et seq.*, and in the Board's legislative rules, including but not limited to W. Va. Code R. § 11-1A-1 *et seq.* Dr. Otellin shall also fully comply with his legal duty to access the West Virginia Controlled Substances Monitoring Database in accordance with W. Va. Code §60A-9-5a.

4. Dr. Otellin agrees that he may be subject to additional disciplinary processes, as permitted by law, for any violation of the terms of this Consent Order.


5. This Consent Order relates solely to Complaint No. 18-81-W and does not relate to or resolve any other matters that may be pending before the Board.

Consent Order
Alexander Vladimirovich Otellin, MD
Page 9 of 10

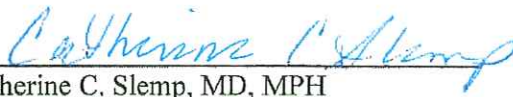
6. This Consent Order shall be deemed entered on the date that this Order, with all required signatures affixed hereupon, is received in the Board's 101 Dee Drive, Charleston, West Virginia, office. The Executive Director of the West Virginia Board of Medicine is hereby authorized to denote the date of entry on behalf of the Board in accordance with this paragraph.

ENTERED ON: September 9, 2019

WEST VIRGINIA BOARD OF MEDICINE


Kishore K. Challa, MD, FACC
President

Date: 9/9/2019


Catherine C. Slemp, MD, MPH
Secretary

Date: 9/9/19

Consent Order
Alexander Vladimirovich Otellin, MD
Page 10 of 10

ACCEPTANCE

I, ALEXANDER VLADIMIROVICH OTELLIN, MD, HAVE READ AND UNDERSTAND THE FOREGOING CONSENT ORDER. I HAVE BEEN GIVEN SUFFICIENT TIME AND OPPORTUNITY TO CONSIDER THIS CONSENT ORDER, AND I UNDERSTAND THE EFFECT IT WILL HAVE UPON MY LICENSE TO PRACTICE MEDICINE AND SURGERY IN WEST VIRGINIA.

BY SIGNING THIS CONSENT ORDER, I HAVE WAIVED CERTAIN RIGHTS, BUT I DO SO KNOWINGLY AND VOLUNTARILY, AND I DO NOT WISH TO ASSERT THOSE RIGHTS IN THIS MATTER.

I UNDERSTAND THAT I HAVE THE RIGHT TO LEGAL COUNSEL, THAT I HAVE EXERCISED THE RIGHT TO LEGAL COUNSEL, AND THAT I HAVE BEEN PROVIDED WITH AMPLE TIME TO SEEK LEGAL ADVICE REGARDING MY ACCEPTANCE OF THIS CONSENT ORDER FROM MY ATTORNEY.

I AM SIGNING THIS CONSENT ORDER VOLUNTARILY, AND I UNDERSTAND THE POTENTIAL CONSEQUENCES OF VIOLATING THIS CONSENT ORDER.



Alexander Vladimirovich Otellin, MD

Date: September 4, 2019

STATE OF West Virginia

COUNTY OF Kanawha, to-wit:

I, Holly Gumbert, a Notary Public for said county and state do hereby certify that Alexander Vladimirovich Otellin, MD, whose name is signed herein above has this day acknowledged the same before me.

Given under my hand this 4th day of Sept., 2019.

My Commission expires January 23, 2022


Notary Public

