

BEFORE THE MEDICAL BOARD
STATE OF COLORADO
Case No. 2024-3786

CEASE AND DESIST ORDER

**IN THE MATTER OF THE UNLICENSED PRACTICE OF MEDICINE BY HEATHER COPELAND /
APEX PHYSICAL MEDICINE AND REHABILITATION**

Respondent.

To:

**HEATHER COPELAND
APEX PHYSICAL MEDICINE AND REHABILITATION
11095 Falling Star Road
Fountain, CO 80817**

**HEATHER COPELAND
APEX PHYSICAL MEDICINE AND REHABILITATION
3910 S. Carefree Circle, Suite F
Colorado Springs, CO 80917**

The Colorado Medical Board, (the “Board”), having reviewed all available information in this matter hereby **ORDERS HEATHER COPELAND and APEX PHYSICAL MEDICINE AND REHABILITATION (“Respondents”) TO CEASE AND DESIST THE UNLICENSED PRACTICE OF MEDICINE.**

The Board **HEREBY FINDS:**

1. The Board has jurisdiction over Respondents and the subject matter herein, and there exists credible evidence that Respondents have acted without the required license to practice medicine, in violation of Sections 12-240-107(2) and 12-240-135, C.R.S.
2. Respondents are not licensed, and have never been licensed to practice medicine in the State of Colorado, as required by Section 12-240-117(2) C.R.S.
3. Respondents are not exempt from the licensing requirements of Article 240, Title 12, C.R.S.

4. Since approximately January 1, 2024, Respondents engaged in the unlicensed practice of medicine when Respondents offered and provided medical services to the public. Specifically, Respondents:

- a. Operated a pain management clinic, including offering and providing ketamine and platelet-rich plasma, which constitutes the practice of medicine.
- b. Respondent Apex Physical Medicine & Rehabilitation is not owned by a licensed medical provider. Respondent Heather Copeland, who is not a licensed medical provider, is the only listed Member of Respondent Apex Physical Medicine & Rehabilitation.
- c. Respondent Apex Physical Medicine & Rehabilitation is registered as a Professional Limited Liability Company with the Colorado Secretary of State, but is not owned by members who are licensed medical providers, as required by Section 12-240-138, C.R.S. Nor does Respondent Apex Physical Medicine & Rehabilitation meet the requirements of a provider network, which requires ownership by a group of licensed health-care providers pursuant to Section 6-18-301.5, C.R.S.

5. The actions performed by Respondents as set forth in paragraph 5 above, constitute the practice of medicine as a defined in Section 12-240-107, C.R.S.

6. Based on the above, Respondents are practicing medicine as defined in Section 12-240-107, C.R.S. without the required license.

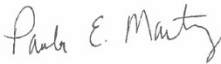
7. Respondents' conduct constitutes the unlicensed practice of medicine, in violation of Sections 12-240-107(2) and 12-240-135, C.R.S.

8. Respondents' conduct creates an imminent threat to the health and safety of the public.

THE COLORADO MEDICAL BOARD HEREBY ORDERS, pursuant to Sections 12-240-107(2) and 12-240-135, C.R.S., that Respondents immediately **CEASE AND DESIST** the practice of medicine in violation of Sections 12-240-107(2) and 12-240-135, C.R.S.

The foregoing **CEASE AND DESIST ORDER** is effective this 22nd day of October 2024.

FOR THE COLORADO MEDICAL BOARD

BY: 
Paula Martinez
Program Director
1560 Broadway, Suite 1350
Denver, CO 80202

Within ten days after service of this Cease and Desist Order, pursuant to section 12-20-405(1)(b), C.R.S., Respondent may request a hearing on the question of whether such acts or practices are in violation of Article 240 of Title 12, C.R.S., have occurred.

To apply for or to renew a license, please visit the Division of Profession and Occupations website at <https://apps.colorado.gov/dora/licensing/>.