

IN THE MATTER OF
NICHOLAS M. HASTINGS, D.O.

Respondent

License Number: H0101833

BEFORE THE
MARYLAND STATE
BOARD OF PHYSICIANS

Case Number: 2227-0027

FINAL ORDER

PROCEDURAL BACKGROUND

The Maryland Board of Physicians (the “Maryland Board”) received information that Nicholas Hastings, D.O. (the “Respondent”), License Number H0101833, a physician licensed to practice medicine in Maryland via the Interstate Medical Licensure Compact (the “Compact”), was disciplined by the North Carolina Medical Board (the “North Carolina Board”). In a Consent Order, dated August 18, 2026, the North Carolina Board issued a public reprimand on the Respondent’s license. A copy of the North Carolina Board Consent Order is attached hereto.

Based on the above-referenced North Carolina Board sanction, the Maryland Board is authorized to discipline the Respondent, pursuant to Health Occ. § 14-3A-01, Section 10.

Health Occ. § 14-3A-01, Interstate Medical Licensure Compact, Section 10 Disciplinary Actions provides:

- (a) Any disciplinary action taken by any member board against a physician licensed through the Compact shall be deemed unprofessional conduct that may be subject to discipline by other member boards, in addition to any violation of the Medical Practice Act or regulations in that state.

....

- (c) If disciplinary action is taken against a physician by a member board not in the state of principal license, any other member board may deem the action conclusive as to matter of law and fact decided; and

- (1) Impose the same or lesser sanction(s) against the physician so long as such sanctions are consistent with the Medical Practice Act of that state [.]

Maryland Disciplinary Panel A (“Panel A”) has determined that the acts for which the Respondent was disciplined in North Carolina would be: (1) unprofessional conduct in the practice of medicine, a violation of the Maryland Medical Practice Act under Health Occ. §14-404(a)(3)(ii); and (2) practices medicine with an unauthorized person or aids an unauthorized person in the practice of medicine, a violation of the Maryland Medical Practice Act under Health Occ. §14-404(a)(18). Additionally, the violation is deemed unprofessional conduct automatically under Health Occ. §14-3A-01, Section 10(a).

FINDINGS OF FACT

Under Health Occ. § 14-3A-01 Section 10(c), a compact member board may deem the facts in any disciplinary action taken against a physician by a member board to be conclusive as a matter of fact decided. Accordingly, Panel A makes the following findings of fact:

1. The Respondent was licensed to practice medicine in Maryland on or about October 1, 2024, under license Number H0101833.
2. The North Carolina Board opened an investigation into the Respondent based on allegations that he aided and abetted the unlawful corporate practice of medicine when he allowed a registered nurse, who is not licensed by the Board, to operate a medical spa business.
3. In June of 2025, the Respondent purchased and became the owner of a company, Moxie Medical Hub (MMH), which specialized in establishing and restructuring aesthetic medical spas. A registered nurse and owner of “Med Spa A” located in Asheville, North Carolina, consulted with MMH to restructure and ensure the company maintained compliance with state laws. Med Spa A provided cosmetics and medical services, including dermal fillers, Botox, neurotoxins, and additional injectable treatments.

4. During the investigation, it was found that the Respondent did not manage the MMH's day-to-day operations and relied on a compliance team to restructure and administer business arrangements in accordance with North Carolina Law. The Respondent did not supervise the registered nurse, did not review medical charts, did not participate in medical decision making, including treatment protocols, did not profit from the revenue of Med Spa A, and had never visited the physical location, which was included in the stock acquisition.
5. By Consent Order dated August 18, 2026, the North Carolina Board deemed the Respondent's conduct as unprofessional and reprimanded the Respondent.

CONCLUSIONS OF LAW

Based on the foregoing Findings of Fact, based on the North Carolina Board's Conclusions of Law, and based on Health Occ. § 14-3A-01 Section 10(a) and (c), Panel A concludes as a matter of law that the Respondent is guilty of unprofessional conduct in the practice of medicine, in violation of Health Occ. § 14-404(a)(3)(ii) and practices medicine with an unauthorized person or aids an unauthorized person in the practice of medicine, a violation of Health Occ. § 14-404(a)(18).

SANCTION

Pursuant to Health Occ. § 14-3A-01, Interstate Medical Licensure Compact, Section 10(c)(1), the Maryland Board may impose the same or lesser sanction against the physician so long as such sanctions are consistent with the Maryland Medical Practice Act. Panel A will impose a reprimand as a sanction.

ORDER

It is, thus, by Panel A, hereby,

ORDERED that the Respondent's medical license in the State of Maryland be and is hereby **REPRIMANDED**; and it is further

ORDERED that this Final Order shall not be amended or modified, and future requests for modification will not be considered; and it is further

ORDERED that this Final Order is a public document. *See* Health Occ. §§1-607, 14-411.1(b)(2) and Gen. Prov. §4-333(b)(6).

09/02/2026
Date

Signature on File

Christine A. Farrelly
Executive Director
Maryland State Board of Physicians

NOTICE OF RIGHT TO PETITION FOR JUDICIAL REVIEW

Pursuant to Health Occ. 14-408, the Respondent has the right to seek judicial review of this Order. Any petition for judicial review shall be filed within thirty (30) days from the date of mailing of this Order. The cover letter accompanying this Order indicates the date the decision is mailed. Any petition for judicial review shall be made as provided for in the Administrative Procedure Act, Md. Code Ann., State Gov't § 10-222 and Title 7, Chapter 200 of the Maryland Rules of Procedure.

If the Respondent files a petition for judicial review, the Board is a party and should be served with the court's process at the following address:

Christine A. Farrelly
Executive Director
Maryland State Board of Physicians
4201 Patterson Avenue, 4th Floor
Baltimore, Maryland 21215

Notice of any petition should also be sent to Board Counsel at the following address:

David Finkler
Assistant Attorney General
Maryland Office of the Attorney General
Maryland Department of Health
300 West Preston Street, Suite 302
Baltimore, Maryland 21201

**North Carolina Order,
dated August 18, 2026**

BEFORE THE
NORTH CAROLINA MEDICAL BOARD

In re:	)	
	)	
Nicholas Michael Hastings, D.O.,	)	CONSENT ORDER
	)	
Respondent.	)	

This matter is before the North Carolina Medical Board ("Board") regarding information provided to the Board concerning Nicholas Michael Hastings, D.O. ("Dr. Hastings"). Dr. Hastings makes the following admissions, and the Board makes the following findings and conclusions:

STATUTORY AUTHORITY

The Board is a body duly organized under the laws of North Carolina and is the proper party to bring this proceeding under the authority granted to it in Article 1 of Chapter 90 of the North Carolina General Statutes and the rules and regulations promulgated thereto.

FINDINGS OF FACT

Dr. Hastings was first issued a license to practice medicine by the Board on or about June 27, 2025, license number 2025-02139.

At all times relevant hereto, Dr. Hastings practiced emergency medicine in Ohio and maintained medical licenses in multiple other states.

Registered Nurse A established a limited liability company in January 2025, serving as its sole member and organizer. The company, a medical spa in Asheville, North Carolina ("Med Spa A"), was owned and operated by Registered Nurse A. Through Med Spa A, Registered Nurse A provided cosmetic and medical services, including dermal fillers, BOTOX® and other neurotoxins, and additional injectable treatments. These procedures constitute the practice of medicine as defined by N.C. Gen. Stat. § 90-1.1.

As a general rule, with few exceptions, none of which are applicable here, a business entity that engages in the practice of medicine must be owned by licensees of this Board. Unless an exception applies, non-licensees who own and operate medical practices are engaged in the unlawful corporate practice of medicine. When a licensee of this Board assists non-licensee owners of a medical practice, they are aiding and abetting the unlawful corporate practice of medicine.

Registered Nurse A consulted with an online company called Moxie, which specializes in establishing aesthetic medical spas, to help restructure her business in a manner that Moxie represented would comply with state law.

Moxie created Moxie Medical Hub ("MMH"), PC, a professional corporation to provide med spa services in North Carolina. Moxie contacted Dr. Hastings in or around May 2025 and offered him the opportunity to acquire MMH. In June 2025, based upon Moxie's

recommendation and compliance assurances, Dr. Hastings purchased all shares of MMH from another physician for sixty cents and became its owner. The acquisition of MMH included Med Spa A and other North Carolina medical spas.

Under the arrangement proposed and structured by Moxie, Dr. Hastings received a monthly flat fee of \$500.00 in connection with his role. Dr. Hastings did not manage the day-to-day operation of Med Spa A and relied upon Moxie and its compliance team to structure and administer the arrangement in accordance with North Carolina law.

Dr. Hastings did not profit from the revenue of Med Spa A. Registered Nurse A maintained a management services agreement with Moxie in which she received 91% of all revenues generated by Med Spa A. The other 9% went to Moxie. Except in instances permitted by law, which were not present here, it is the position of the Board that a licensee cannot share revenue on a percentage basis with a non-licensee. To do so is fee-splitting and is grounds for disciplinary action.

Dr. Hastings did not supervise Registered Nurse A. The supervising physician was a North Carolina physician who worked as an independent contractor for Moxie. Dr. Hastings never reviewed medical charts or participated in medical decision making, including treatment protocols. Dr. Hastings never visited Med Spa A, which was included in the MMH stock acquisition. The day-to-

day functions of Med Spa A and patient care decisions were made by Registered Nurse A under the supervision of a physician hired as a "medical director," although the medical director lived four hours away from Med Spa A and never physically visited it.

Med Spa A contracted with an outside company to perform online examinations by advanced practice providers - nurse practitioners or physician assistants - who would authorize Registered Nurse A to perform injections or other treatments.

Ten patient charts were reviewed. All followed a standard pattern and did not contain documentation sufficient for the Board to verify review by a North Carolina licensed physician or advanced practice provider. Dr. Hastings did not personally participate in the examinations or treatment decision and relied upon Moxie, the designated medical director, and the outside examination company to establish and implement compliant patient-evaluation process.

Dr. Hastings' involvement with Med Spa A arose from his acquisition and ownership of MMH through the stock transfer transaction arranged by Moxie. At the time of the acquisition, Dr. Hastings understood and believed, based on Moxie's repeated representations, that the ownership and management structure complied with North Carolina law.

Dr. Hastings reports that Moxie initiated contact with him, held itself out as experienced in medical spa compliance, and after Dr. Hastings specifically asked Moxie's compliance representative

whether the company structure complied with North Carolina law, he was repeatedly assured that it did. He further reports that he would not have entered into the transaction had he known the arrangement was unlawful, and that he had no intent to evade or circumvent North Carolina law.

Dr. Hastings further reports that, before the acquisition, he specifically asked Moxie whether Med Spa A, the proposed structure, or any prior physician had been the subject of complaints, compliance problems, or licensing issues. Moxie represented that there were no such prior issues. The purchase agreement also required disclosure of any open or pending investigation.

The complaint and investigation concerning Med Spa A predated Dr. Hastings' acquisition of MMH. Dr. Hastings did not own or operate Med Spa A when the initial complaint was filed. Dr. Hastings reports that neither Moxie nor the selling physician disclosed the pre-existing investigation before the stock transfer, notwithstanding the disclosure provision in the purchase agreement.

After learning of the investigation, Dr. Hastings promptly responded to the Board and cooperated with its requests for information and interviews. He subsequently severed all ties with Moxie.

CONCLUSIONS OF LAW

Dr. Hastings' conduct, as described above, constitutes unprofessional conduct within the meaning of N.C. Gen. Stat. § 90-14(a)(6), which is grounds under that section of the North Carolina General Statutes for the Board to annul, suspend, revoke, condition, or limit Dr. Hastings' license to practice medicine or to deny any application he may make in the future.

Dr. Hastings' conduct, as described above, constitutes a violation of a law(s) involving the practice of medicine within the meaning of N.C. Gen. Stat. § 90-14(a)(7), which is grounds under that section of the North Carolina General Statutes for the Board to annul, suspend, revoke, condition, or limit Dr. Hastings' license to practice medicine or to deny any application he may make in the future.

PROCEDURAL STIPULATIONS

Dr. Hastings acknowledges and agrees that the Board has jurisdiction over him and over the subject matter of this case.

Dr. Hastings knowingly waives his right to any hearing and to any judicial review or appeal in this case.

Dr. Hastings acknowledges that he has read and understands this Consent Order and enters into it voluntarily.

Dr. Hastings desires to resolve this matter without the need for more formal proceedings and agrees not to contest the matters

set forth herein in this case and any potential future proceeding involving the Board.

The Board has determined that it is in the public interest to resolve this case as set forth below.

ORDER

NOW, THEREFORE, with Dr. Hastings' consent, it is ORDERED that:

1. Dr. Hastings is hereby REPRIMANDED.
2. This Consent Order shall take effect immediately upon its execution by both Dr. Hastings and the Board, and it shall continue in effect until specifically ordered otherwise by the Board.
3. Dr. Hastings hereby waives any requirement under any law or rule that this Consent Order be served on him.
4. Upon execution by Dr. Hastings and the Board, this Consent Order shall become a public record within the meaning of Chapter 132 of the North Carolina General Statutes and shall be subject to public inspection and dissemination pursuant to the provisions thereof. Additionally, it will be reported to persons, entities, agencies, and clearinghouses as required and permitted by law including, but not limited to, the Federation of State Medical Boards and the National Practitioner Data Bank.

By Order of the North Carolina Medical Board this the 18th day
of August, 2026.

NORTH CAROLINA MEDICAL BOARD

By: *Signature on File*
Anuradha Rao-Patel, M.D.
President

Consented to this the 12 day of August, 2026.

Signature on File

Nicholas Michael Hastings, D.O.

State of Illinois

County of Perry

I, Heather L. Kattenbraker, do hereby certify that Nicholas Michael Hastings, D.O., personally appeared before me this day and acknowledged the due execution of the foregoing instrument.

Witness my hand and official seal this the 12 day of August, 2026.

Heather L. Kattenbraker
Notary Public

(Official Seal)

My Commission Expires: 2-24-27

