



STATE OF NEW YORK
DEPARTMENT OF HEALTH

433 River Street, Suite 303

Troy, New York 12180-2299

Barbara A. DeBuono, M.D., M.P.H.
Commissioner

Dennis P. Whalen
Executive Deputy Commissioner

November 10, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mehdi Jandaghi, M.D.
27403 Country Glen Road
Agura Hills, CA 91301

Mehdi Jandaghi, M.D.
3535 Banbury Drive
Apartment 93
Riverside, CA 92505

Roy Nemerson, Esq.
NYS Department of Health
5 Penn Plaza - Sixth Floor
New York, New York 10001

RE: In the Matter of Mehdi Jandaghi, M.D.

Dear Parties:

Enclosed please find the Determination and Order (No. 97-276) of the Hearing Committee in the above referenced matter. This Determination and Order shall be deemed effective upon the receipt or seven (7) days after mailing by certified mail as per the provisions of §230, subdivision 10, paragraph (h) of the New York State Public Health Law.

Five days after receipt of this Order, you will be required to deliver to the Board of Professional Medical Conduct your license to practice medicine if said license has been revoked, annulled, suspended or surrendered, together with the registration certificate. Delivery shall be by either **certified mail or in person** to:

Office of Professional Medical Conduct
New York State Department of Health
Hedley Park Place
433 River Street - Fourth Floor
Troy, New York 12180

If your license or registration certificate is lost, misplaced or its whereabouts is otherwise unknown, you shall submit an affidavit to that effect. If subsequently you locate the requested items, they must then be delivered to the Office of Professional Medical Conduct in the manner noted above.

As prescribed by the New York State Public Health Law §230, subdivision 10, paragraph (i), and §230-c subdivisions 1 through 5, (McKinney Supp. 1992), "the determination of a committee on professional medical conduct may be reviewed by the Administrative Review Board for professional medical conduct." Either the licensee or the Department may seek a review of a committee determination.

Request for review of the Committee's determination by the Administrative Review Board stays penalties **other than suspension or revocation** until final determination by that Board. Summary orders are not stayed by Administrative Review Board reviews.

All notices of review must be served, by **certified mail**, upon the Administrative Review Board **and** the adverse party within fourteen (14) days of service and receipt of the enclosed Determination and Order.

The notice of review served on the Administrative Review Board should be forwarded to:

James F. Horan, Esq., Administrative Law Judge
New York State Department of Health
Bureau of Adjudication
Hedley Park Place
433 River Street, Fifth Floor
Troy, New York 12180

The parties shall have 30 days from the notice of appeal in which to file their briefs to the Administrative Review Board. Six copies of all papers must also be sent to the attention of Mr. Horan at the above address and one copy to the other party. The stipulated record in this matter shall consist of the official hearing transcript(s) and all documents in evidence.

Parties will be notified by mail of the Administrative Review Board's
Determination and Order.

Sincerely,

A handwritten signature in black ink, appearing to read "Tyrone T. Butler". The signature is written in a cursive style with a large initial 'T'.

Tyrone T. Butler, Director
Bureau of Adjudication

TTB:nm
Enclosure

**STATE OF NEW YORK: DEPARTMENT OF HEALTH
STATE BOARD FOR PROFESSIONAL MEDICAL CONDUCT**

COPY

**IN THE MATTER
OF
MEHDI JANDAGHI, M.D.**

**DETERMINATION
AND
ORDER
BPMC - 97 - 276**

DIANA E. GARNEAU, M.D., (Chair), HOWARD SIMON, M.D. and MARY PATRICIA MEAGHER, duly designated members of the State Board for Professional Medical Conduct, served as the Hearing Committee in this matter pursuant to § 230(10) and § 230(12) of the Public Health Law.

MARC P. ZYLBERBERG, ESQ., ADMINISTRATIVE LAW JUDGE, served as the Administrative Officer.

The Department of Health appeared by **ROY NEMERSON, ESQ.**, Deputy Counsel.

Respondent, **MEHDI JANDAGHI, M.D.**, did not appear personally and was not represented by counsel.

A Hearing was held on October 9, 1997. Evidence was received and examined. A transcript of the proceeding was made. After consideration of the record, the Hearing Committee issues this Determination and Order, pursuant to the Public Health Law and the Education Law of the State of New York.

STATEMENT OF CASE

The State Board for Professional Medical Conduct is a duly authorized professional disciplinary agency of the State of New York. (§ 230 et seq. of the Public Health Law of the State of New York [**"P.H.L."**]).

A Commissioner's Summary Order dated September 15, 1997; a Statement of Charges, dated September 12, 1997; and a Notice of Summary Proceeding, dated September 12, 1997 were issued by **BARBARA A. DeBUONO, M.D., MPH**, as Commissioner of Health of the State of New York (**"Petitioner"** or **"NYSDOH"**).

The Summary Order (under P.H.L. § 230[12]) issued by Petitioner suspended Dr. Jandaghi's license, effective immediately and ordered a hearing to be held on October 9, 1997.

MEHDI JANDAGHI, M.D., (**"Respondent"**) is charged with professional misconduct within the meaning of § 6530(9)(b) of the Education Law of the State of New York (**"Education Law"**), to wit: "professional misconduct ... by reason of having been found guilty of improper professional practice or professional misconduct by a duly authorized professional disciplinary agency of another state ..." (Petitioner's Exhibit # 1 and § 6530[9][b] of the Education Law).

In order to find that Respondent committed § 6530(9)(b) misconduct, the Hearing Committee must determine: (1) whether Respondent was found guilty of improper professional practice or professional misconduct by a duly authorized professional disciplinary agency of another state and (2) whether Respondent's conduct on which the findings were based would, if committed in New York State, constitute professional misconduct under the laws of New York State.

Respondent is also charged with professional misconduct within the meaning of § 6530(9)(d) of the Education Law, to wit: professional misconduct ... by reason of having his license to practice medicine revoked, suspended or having other disciplinary action taken ... by a duly authorized professional disciplinary agency of another state, for conduct, which conduct, would, if committed in New York State constitute professional misconduct under the Laws of New York State (Petitioner's Exhibit # 1 and § 6530[9][d] of the Education Law).

In order to find that Respondent committed § 6530(9)(d) misconduct, the Hearing Committee must determine: (1) whether Respondent had some disciplinary action taken or instituted against him by a duly authorized professional disciplinary agency of another state; OR (2) whether Respondent's license to practice medicine was revoked or suspended by a duly authorized professional disciplinary agency of another state: AND (3) whether Respondent's conduct, on which the disciplinary action or surrender was taken would, if committed in New York State, constitute professional misconduct under the laws of New York State.

A copy of the Commissioner's Summary Order, Statement of Charges, and Notice of Summary Proceeding is attached to this Determination and Order as Appendix I.

FINDINGS OF FACT

The following Findings of Fact were made after a review of the entire record in this matter. These facts represent evidence found persuasive by the Hearing Committee in arriving at a particular finding. All Findings and Conclusions herein were unanimous. The State, who has the burden of proof, was required to prove its case by a preponderance of the evidence. All Findings of Fact made by the Hearing Committee were established by at least a preponderance of the evidence.

1. Respondent was authorized to practice medicine in New York State on April 12, 1966 by the issuance of license number 096341 by the New York State Education Department (Petitioner's Exhibits # 1 & # 4)¹.

2. The Division of Medical Quality, Medical Board of California of the State of California ("**California Board**") is a state agency charged with regulating the practice of medicine pursuant to the laws of the State of California (Petitioner's Exhibit # 5).

3. On October 9, 1996, the California Board filed an accusation in Case No. 18-96-62918 ("**accusation**") (Petitioner's Exhibit # 5).

4. The accusation indicates that Respondent threatened the personal safety of personnel of the California Medical Board Diversion Program. In addition, Respondent was alleged to have impersonated another licensed medical practitioner (Petitioner's Exhibit # 5).

5. On November 1, 1996, after a hearing, the California Board, through an Administrative Law Judge ("**Judge**"), issued an Interim Order ("**Interim Order**") suspending Respondent from the practice of medicine in California (Petitioner's Exhibit # 5).

6. The Judge concluded that permitting Respondent to engage in the practice of medicine would endanger the public health, safety, and welfare of the people of California (Petitioner's Exhibit # 5).

7. On November 25, 1996, after a hearing, the Judge extended the Interim Order until the California Board made a final determination of the accusation (Petitioner's Exhibit # 5).

8. Respondent failed to appear at the November 1, 1996 and the November 25, 1996 hearings (Petitioner's Exhibit # 5).

¹ refers to exhibits in evidence submitted by the New York State Department of Health (Petitioner's Exhibit). No exhibits were submitted by or on behalf of Dr. Jandaghi.

9. On March 14, 1997 the California Board found that Respondent was in default and had waived his right to a hearing to contest the allegations contained in the accusation. Based on Respondent's default and the evidence before the it, the California Board found the allegations in the accusation to be true (Petitioner's Exhibit # 5).

10. On March 14, 1997, the California Board issued an Order revoking Respondent's certificate to practice medicine and surgery in California. Respondent was also ordered to reimburse the California Board the amount of \$5,768.36 as costs (Petitioner's Exhibit # 5).

11. Respondent's conduct constituted violations of the California Business and Professions Code § 2234(a), (e) and (f) and § 2289 (Petitioner's Exhibit # 5).

12. The Hearing Committee accepts the accusation and the default decision and adopts them as part of its own Findings of Fact (Petitioner's Exhibit # 5).

13. Respondent has not filed a written answer to each (or any) of the charges and allegations contained in the Statement of Charges issued by Petitioner (Petitioner's Exhibit # 1); (P.H.L. § 230[10][c] and/or [p]).

14. Paragraphs A, A.1, A.2 and A.3 of the Factual Allegations contained in the September 12, 1997 Statement of Charges are deemed admitted by the Hearing Committee by operation of Law (P.H.L. § 230[10][c] and/or [p]).

CONCLUSIONS OF LAW

The Hearing Committee makes the following conclusions, pursuant to the Findings of Fact listed above. All conclusions resulted from a unanimous vote of the Hearing Committee.

The Hearing Committee concludes that the Factual Allegations, from the September 12, 1997 Statement of Charges, are SUSTAINED.

The Hearing Committee further concludes, based on the above Factual Conclusion, that the FIRST and SECOND SPECIFICATION OF CHARGES in the Statement of Charges are SUSTAINED.

The Hearing Committee concludes that the Department of Health has shown by a preponderance of the evidence that Respondent was found guilty of improper professional practice and of professional misconduct by the State of California and his conduct in California would constitute professional misconduct under the laws of New York State. The Department of Health has met its burden of proof.

I. Professional Misconduct under §6530(9)(d) of the Education Law.

The California Board is a duly authorized professional disciplinary agency. In November 1996, the State of California, through the California Board suspended Respondent from the practice of medicine. The Hearing Committee finds and determines that Respondent's conduct on which the disciplinary action was taken would, if committed in New York State, constitute professional misconduct under at least § 6530(2); and § 6530(20) of the Education Law of New York State (See discussion under Part II below).

Therefore, Respondent has committed professional misconduct pursuant to § 6530(9)(d) of the Education Law.

II Professional Misconduct under § 6530(9)(b) of the Education Law.

The Default Decision, finding each allegation in the accusation to be true, contains facts and conclusions which establish that Respondent's conduct constituted grounds for the revocation of his California medical license. The Default Decision has findings, by the California Board, of violations of California Statutes. The California Board found that Respondent impersonated another licensed medical practitioner. The California Board also found that Respondent threatened to kill his former Medical Diversion Counselor on two separate occasions and made obscene phone calls to that individual. Respondent was found guilty of improper professional practice or professional misconduct by the California Board.

Taking the allegations in the accusation of the California Board as true, the Hearing Committee finds that the record establishes that Respondent is guilty of making intentional misrepresentations which rise to the level of fraudulent practices. In addition, the serious threats made by Respondent clearly evidences moral unfitness to practice medicine.

The record establishes and the Hearing Committee finds that Respondent's conduct, if committed in New York State, would constitute professional misconduct pursuant to at least § 6530(2)²; and § 6530(20)³ of the Education Law.

Therefore, Respondent has committed professional misconduct pursuant to § 6530(9)(b) of the Education Law.

² Each of the following is professional misconduct... Practicing the profession fraudulently or beyond its authorized scope;

³ Each of the following is professional misconduct... Conduct in the practice of medicine which evidences moral unfitness to practice medicine;

DETERMINATION

The Hearing Committee, pursuant to the Findings of Fact and Conclusions of Law set forth above, unanimously determines that Respondent's license to practice medicine in New York State should be REVOKED.

This determination is reached after due and careful consideration of the full spectrum of penalties available pursuant to P.H.L. § 230-a, including:

(1) Censure and reprimand; (2) Suspension of the license, wholly or partially; (3) Limitations of the license; (4) Revocation of license; (5) Annulment of license or registration; (6) Limitations; (7) the imposition of monetary penalties; (8) a course of education or training; (9) performance of public service; and (10) probation.

The record clearly establishes that Respondent committed significant misconduct in California. In determining an appropriate measure of discipline to impose, the Hearing Committee is bound by the documentary evidence presented by Petitioner. Respondent failed to personally appear at the October 9, 1997 Hearing and provide any mitigation as to the sanctions to be imposed.

With regard to the issue of sanctions, the Hearing Committee recognizes that it is a generally accepted principal that the State where respondent lived and practiced medicine at the time of the offense has the greatest interest in the issue and the public policy considerations relevant to such disciplinary actions. The sanctions issued by the State of California have been reviewed and carefully considered by the Hearing Committee. Based on the evidence presented, the Hearing Committee agrees with the sanctions imposed by the State of California .

Accordingly, Respondent's license to practice medicine in the State of New York should be revoked.

The Hearing Committee concludes that if this case had been held in New York, on the facts presented relative to Respondent's threats and impersonations, the Hearing Committee would have voted unanimous for revocation of Respondent's license.

The Hearing Committee considers Respondent's misconduct to be very serious. With a concern for the health and welfare of patients in New York State, the Hearing Committee determines that revocation of Respondent's license is the appropriate sanction to impose under the totality of the circumstances presented.

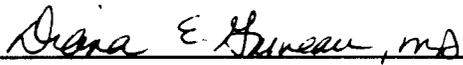
By execution of this Determination and Order, all members of the Hearing Committee certify that they have read and considered the complete record of this proceeding.

ORDER

Based on the foregoing, **IT IS HEREBY ORDERED THAT:**

1. The Specifications of professional misconduct contained within the Statement of Charges (Petitioner's Exhibit # 1) are **SUSTAINED**, and
2. Respondent's license to practice medicine in the State of New York is hereby **REVOKED**.

DATED: Albany, New York
October 20, 1997



DIANA E. GARNEAU, M.D., (Chair),
HOWARD SIMON, M.D.
MARY PATRICIA MEAGHER

TO:

Mehdi Jandaghi, M.D.
27403 Country Glen Road
Agura Hills, CA 91301

Mehdi Jandaghi, M.D.
3535 Banbury Drive
Apartment 93
Riverside, CA 92505

Roy Nemerson, Esq.
Deputy Counsel,
New York State Department of Health
Bureau of Professional Medical Conduct
5 Penn Plaza, 6th Floor
New York, New York 10001



APPENDIX I

NEW YORK STATE DEPARTMENT OF HEALTH
STATE BOARD FOR PROFESSIONAL MEDICAL CONDUCT

IN THE MATTER
OF
MEHDI JANDAGHI, M.D.

COMMISSIONER'S
SUMMARY
ORDER

TO: MEHDI JANDAGHI, M.D.
Apartment 93
3535 Banbury Drive
Riverside, California 92505

The undersigned, Barbara A. DeBuono, M.D., M.P.H., Commissioner of Health of the State of New York, pursuant to N.Y. Public Health Law §230 (McKinney 1990 and Supp. 1997 (as amended by Ch. 627 and 599 of the Laws of 1996)), upon the recommendation of a Committee on Professional Medical Conduct of the State Board for Professional Medical Conduct, has determined that the duly authorized professional disciplinary agency of another jurisdiction has made a finding substantially equivalent to a finding that the practice of medicine by MEHDI JANDAGHI (the Respondent) in that jurisdiction constitutes an imminent danger to the health of its people or that Respondent has been disciplined by such an agency for acts which if committed in this state would have constituted a basis for summary action by the Commissioner pursuant to N.Y. Public Health Law §230(12)(a) (McKinney 1990 and Supp. 1997 (as amended by Ch. 627 and 599 of the Laws of 1996)), as is more fully set forth in the Statement of Charges attached hereto and made a part hereof.

It is therefore:

ORDERED, pursuant to N.Y. Public Health Law §230(12)(b) (McKinney 1990 and Supp. 1997 (as amended by Ch. 627 and 599 of the Laws of 1996)), that effective immediately, Respondent shall not practice medicine in the State of New York. This Order shall remain in effect unless modified or vacated by the Commissioner of Health pursuant to N.Y. Pub. Health Law §230(12) (McKinney 1990 and Supp. 1997 (as amended by Ch. 627 and 599 of the Laws of 1996)).

PLEASE TAKE NOTICE that a hearing will be held pursuant to the provisions of N.Y. Pub. Health Law §230 (McKinney 1990 and Supp. 1997 (as amended by Ch. 627 and 599 of the Laws of 1996)), and N.Y. State Admin. Proc. Act §§301-307 and 401 (McKinney 1984 and Supp. 1997). The hearing will be conducted before a committee on professional conduct of the State Board for Professional Medical Conduct on a date and at a location to be set forth in a written Notice of Summary Hearing to be provided to the Respondent either contemporaneously with this Summary Order or subsequently. Said written Notice may be provided in person, by mail, or by other means.

DATED: Albany, New York
September 15, 1997


BARBARA A. DeBUONO, M.D., M.P.H.
Commissioner of Health

Inquiries should be directed to:

ROY NEMERSON
Deputy Counsel - B.P.M.C.
N.Y.S. Department of Health
Division of Legal Affairs
5 Penn Plaza - Suite 601
New York, New York 10001
(212) - 613-2615

NEW YORK STATE DEPARTMENT OF HEALTH
STATE BOARD FOR PROFESSIONAL MEDICAL CONDUCT

IN THE MATTER
OF
MEHDI JANDAGHI, M.D.

STATEMENT
OF
CHARGES

MEHDI JANDAGHI, M.D., the Respondent, was authorized to practice medicine in New York State in or about 1966, by the issuance of license number 096341 by the New York State Education Department.

FACTUAL ALLEGATIONS

- A. On or about October 9, 1996, the Executive Director of the Medical Board of California filed a Complaint alleging that Respondent had engaged in unprofessional conduct and acts of corruption by virtue of having threatened the life of his former Medical Diversion Counselor on two occasions, and having placed obscene phone calls to that Counselor on two other occasions. The Complaint further alleged that Respondent had utilized a false name in placing phone calls to that Counselor.
1. On November 1, 1996, after a hearing, an Administrative Law Judge concluded that permitting Respondent to engage in the practice of medicine would endanger the public health, safety, and welfare, and issued an Interim Order suspending Respondent from the practice of medicine.
 2. On November 25, 1996, after a hearing, an Administrative Law

Judge concluded that permitting Respondent to engage in the practice of medicine would endanger the public health, safety, and welfare, and extended the Interim Order of Suspension until the Medical Board of California made a final determination of the matter.

3. On March 14, 1997, upon the default of the Respondent, the Division of Medical Quality of the State of California found that the allegations contained in the Complaint were true and revoked Respondent's Physician's and Surgeon's Certificate.

SPECIFICATION OF CHARGES

FIRST SPECIFICATION

HAVING HAD DISCIPLINARY ACTION TAKEN

Respondent is charged with committing professional misconduct as defined in N.Y. Educ. Law §6530(9)(d)(McKinney Supp. 1997) by having his or her license to practice medicine revoked, suspended or having other disciplinary action taken, where the conduct resulting in the revocation, suspension or other disciplinary action involving the license or refusal, revocation or suspension of an application for a license or the surrender of the license would, if committed in New York state, constitute professional misconduct under the laws of New York state (namely N.Y. Educ. Law §6530(2, 8, and/or 20)) as alleged in the facts of the following:

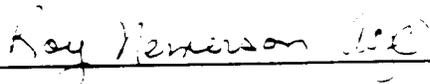
1. Paragraph A and its subparagraphs.

SECOND SPECIFICATION
HAVING BEEN FOUND GUILTY OF
PROFESSIONAL MISCONDUCT

Respondent is charged with committing professional misconduct as defined in N.Y. Educ. Law §6530(9)(b)(McKinney Supp. 1997) by having been found guilty of improper professional practice or professional misconduct by a duly authorized professional disciplinary agency of another state where the conduct upon which the finding was based would, if committed in New York state, constitute professional misconduct under the laws of New York state (namely N.Y. Educ. Law §§6530(2),(8),and/or (20)) as alleged in the facts of the following:

2. Paragraph A and its subparagraphs.

DATED: September 12, 1997
New York, New York



ROY NEMERSON
Deputy Counsel
Bureau of Professional
Medical Conduct

NEW YORK STATE DEPARTMENT OF HEALTH
STATE BOARD FOR PROFESSIONAL MEDICAL CONDUCT

IN THE MATTER
OF
MEHDI JANDAGHI

NOTICE OF
SUMMARY
PROCEEDING

TO: MEHDI JANDAGHI, M.D.
Apartment 93
3535 Banbury Drive
Riverside, California 92505

PLEASE TAKE NOTICE THAT:

An adjudicatory proceeding will be held pursuant to the provisions of N.Y. Pub. Health Law §§230(12) and (10)(p) (McKinney 1990 and Supp. 1997 (as amended by Ch. 627 and 599 of the Laws of 1996)) and N.Y. State Admin. Proc. Act §§301-307 and 401 (McKinney 1984 and Supp. 1997). The proceeding will be conducted before a committee on professional conduct of the State Board for Professional Medical Conduct (Committee) on October 9, 1997, at 10:00 a.m., at the offices of the New York State Department of Health, 5 Penn Plaza, Sixth Floor, New York, New York 10001.

At the proceeding, evidence will be received concerning the allegations set forth in the Statement of Charges, which is attached. A stenographic record of the proceeding will be made and the witnesses at the proceeding will be sworn and examined.

You may appear in person at the proceeding and may be represented by counsel. You may produce evidence or sworn testimony on your behalf. Such evidence or sworn testimony shall be strictly limited to evidence and testimony relating to the nature and severity of the penalty to be imposed upon the licensee. Where the charges are based on the conviction of state law crimes in other jurisdictions, evidence may be offered which would show that the conviction would not be a crime in New York State. The Committee also may limit the number of

witnesses whose testimony will be received, as well as the length of time any witness will be permitted to testify.

If you intend to present sworn testimony, the number of witnesses and an estimate of the time necessary for their direct examination must be submitted to the New York State Department of Health, Division of Legal Affairs, Bureau of Adjudication, Hedley Park Place, 433 River Street, Fifth Floor South, Troy, NY 12180, ATTENTION: HON. TYRONE BUTLER, DIRECTOR, BUREAU OF ADJUDICATION (Telephone: (518-402-0748), (henceforth "Bureau of Adjudication") as well as the Department of Health attorney indicated below, no later than twenty days prior to the scheduled date of the Referral Proceeding, as indicated above.

Pursuant to the provisions of N.Y. Pub. Health Law §230(10)(c), you shall file a written answer to each of the charges and allegations in the Statement of Charges not less than ten days prior to the date of the hearing. Any charge or allegation not so answered shall be deemed admitted. You may wish to seek the advice of counsel prior to filing such answer. The answer shall be filed with the Bureau of Adjudication, at the address indicated above, and a copy shall be forwarded to the attorney for the Department of Health whose name appears below. You may file a written brief and affidavits with the Committee. Six copies of all papers you submit must be filed with the Bureau of Adjudication at the address indicated above, no later than fourteen days prior to the scheduled date of the Referral Proceeding, and a copy of all papers must be served on the same date on the Department of Health attorney indicated below. Pursuant to §301(5) of the State Administrative Procedure Act, the Department, upon reasonable notice, will provide at no charge a qualified interpreter of the deaf to interpret the proceedings to, and the testimony of, any deaf person. Pursuant to the terms of N.Y. State Admin. Proc. Act §401 (McKinney Supp. 1997) and 10 N.Y.C.R.R. §51.8(b), the Petitioner hereby demands disclosure of the evidence that the Respondent intends to introduce at the hearing, including the names of witnesses, a list of and copies of documentary evidence and

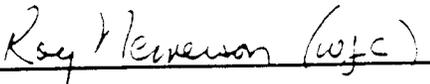
a description of physical or other evidence which cannot be photocopied.

The proceeding may be held whether or not you appear. Please note that requests for adjournments must be made in writing to the Bureau of Adjudication, at the address indicated above, with a copy of the request to the attorney for the Department of Health, whose name appears below, at least five days prior to the scheduled date of the proceeding. Adjournment requests are not routinely granted. Claims of court engagement will require detailed affidavits of actual engagement. Claims of illness will require medical documentation. Failure to obtain an attorney within a reasonable period of time prior to the proceeding will not be grounds for an adjournment.

The Committee will make a written report of its findings, conclusions as to guilt, and a determination. Such determination may be reviewed by the administrative review board for professional medical conduct.

SINCE THESE PROCEEDINGS MAY RESULT IN A DETERMINATION THAT SUSPENDS OR REVOKES YOUR LICENSE TO PRACTICE MEDICINE IN NEW YORK STATE AND/OR IMPOSES A FINE FOR EACH OFFENSE CHARGED, YOU ARE URGED TO OBTAIN AN ATTORNEY TO REPRESENT YOU IN THIS MATTER.

DATED: New York, New York
September 12, 1997


ROY NEMERSON
Deputy Counsel
Bureau of Professional
Medical Conduct

Inquiries should be addressed to:

ROY NEMERSON
Deputy Counsel - B.P.M.C.
NYS Department of Health
Division of Legal Affairs
5 Penn Plaza, Suite 601
New York, New York 10001
(212) 613-2615