

CONSENT AGREEMENT
BETWEEN
J. HAROLD KING, M.D.
AND
THE STATE MEDICAL BOARD OF OHIO

THIS CONSENT AGREEMENT IS entered into by and between J. HAROLD KING, M.D., and THE STATE MEDICAL BOARD OF OHIO, a state agency charged with enforcing Chapters 4730. and 4731. of the Ohio Revised Code.

J. HAROLD KING, M.D., enters into this Agreement being fully aware of his rights, including his right to be advised by counsel.

This Agreement is entered into on the basis of the following statements, admissions and understandings:

WHEREAS, J. HAROLD KING, M.D., absolutely denies any acts of wrongdoing or violation of laws; and

WHEREAS, J. HAROLD KING, M.D., has confidence in his ability to defend the violations brought against him, but is presently seventy-eight (78) years of age and has contemplated retirement for some time; and

WHEREAS, in lieu of a formal adjudication hearing at this time, J. HAROLD KING, M.D., and the BOARD have agreed to enter into this CONSENT AGREEMENT which the parties have resolved to be in their mutual best interests.

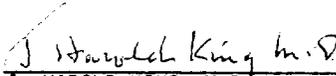
WHEREFORE, in consideration of the foregoing and mutual promises hereinafter set forth, J. HAROLD KING, M.D., and THE STATE MEDICAL BOARD OF OHIO hereby CONSENT and AGREE to the following terms and conditions of limitation upon J. HAROLD KING'S license to practice medicine and surgery in Ohio:

- A. J. HAROLD KING, M.D. does hereby voluntarily, knowingly and intelligently retire from the practice of medicine and surgery effective in thirty (30) days, that date being June 30, 1984.
- B. J. HAROLD KING, M.D. does hereby voluntarily, knowingly and intelligently agree that he will no longer prescribe or dispense controlled or uncontrolled substances, and agrees to promptly notify the Drug Enforcement Administration of this agreement and the effective date thereof.
- C. J. HAROLD KING, M.D. understands that, upon the above effective date and thereafter, he will no longer practice medicine and surgery in the State of Ohio.
- D. J. HAROLD KING, M.D. shall be entitled to retain his medical license and shall be entitled to renew the same from time to time.
- E. J. HAROLD KING, M.D. understands, in light of the foregoing, that he will not endorse or attempt to endorse his medical license to another state.

If, in the discretion of the Secretary of THE STATE MEDICAL BOARD OF OHIO, J. HAROLD KING, M.D. appears to have violated or breached any terms or conditions of this Agreement, THE STATE MEDICAL BOARD OF OHIO reserves the right to institute formal disciplinary proceedings for any and all possible violations or breaches, including, but not limited to, alleged violations of the laws of Ohio occurring before the effective date of this Agreement.

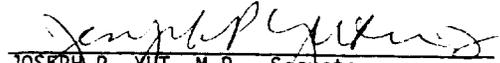
Upon consent of both parties, the terms and conditions of this Agreement may be modified or terminated in writing.

IT IS AGREED AND UNDERSTOOD by and between the parties that this Consent Agreement shall be considered a public record as that term is used in Section 149.43, Ohio Revised Code.



J. HAROLD KING, M.D.

7/2/84
(DATE)



JOSEPH P. YUT, M.D., Secretary
State Medical Board of Ohio

6-27-84
(DATE)



JOHN L. WAGNER
Attorney for J. HAROLD KING
Moulton, Ricksecker, Wagner & Hoover
118 Harding Way West
Galion, Ohio 44833

STATE OF OHIO
THE STATE MEDICAL BOARD
Suite 510
65 South Front Street
Columbus, Ohio 43215

June 15, 1983

J. Harold King, M.D.
295 Glessner Avenue
Mansfield, OH 44903

Dear Doctor King:

In accordance with Chapter 119., Ohio Revised Code, you are hereby notified that the State Medical Board of Ohio intends to determine under the provisions of Section 4731.22, Ohio Revised Code, whether or not to limit, revoke, suspend, refuse to register, or reinstate your certificate to practice medicine and surgery, or to reprimand or place you on probation, for one or more of the following reasons:

1. On or about the dates indicated, you wrote the following prescriptions for Schedule II controlled substances in the following amounts and strengths to the patients listed in the attached Key (to be withheld from public disclosure):

<u>Patient No.</u>	<u>Date</u>	<u>Substance</u>	<u>Amount</u>
1	02/02/82	Preludin 75 mg.	30
	03/09/82	Preludin 75 mg.	30
	05/17/82	Preludin 75 mg.	30
	07/29/82	Preludin 75 mg.	30
	08/30/82	Preludin 75 mg.	30
2	04/06/82	Dexedrine 15 mg.	14
	04/20/82	Dexedrine 15 mg.	30
	08/31/82	Dexedrine 15 mg.	30
	09/28/82	Dexedrine 15 mg.	30
	10/26/82	Dexedrine 15 mg.	30
3	01/25/82	Nembutal	40
	03/18/82	Nembutal	40
	04/27/82	Nembutal	40
	06/10/82	Nembutal	40
	07/15/82	Nembutal	40
	08/19/82	Nembutal	30
	09/10/82	Nembutal	30
	10/25/82	Nembutal	30
	11/23/82	Nembutal	30

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4	02/01/82	Preludin	30
	02/19/82	Preludin 75 mg.	15
	03/12/82	Preludin	30
	04/02/82	Preludin	30
5	01/18/82	Ritalin 10 mg.	30
	01/29/82	Ritalin 10 mg.	30
	02/25/82	Ritalin 10 mg.	30
	03/12/82	Ritalin 10 mg.	30
	04/05/82	Ritalin 10 mg.	30
	04/16/82	Ritalin 10 mg.	30
	05/03/82	Ritalin 10 mg.	30
	05/17/82	Ritalin 10 mg.	30
	05/27/82	Ritalin 10 mg.	60
	06/17/82	Ritalin 10 mg.	30
	07/02/82	Ritalin 10 mg.	30
	07/12/82	Ritalin 10 mg.	30
	07/23/82	Ritalin 10 mg.	30
	08/26/82	Ritalin 10 mg.	30
09/21/82	Ritalin 10 mg.	30	
10/14/82	Ritalin 10 mg.	30	
11/22/82	Ritalin 10 mg.	30	
6	07/06/82	Dexedrine 15 mg.	30
	08/13/82	Dexedrine 15 mg.	30
	09/17/82	Dexedrine 15 mg.	30
	11/29/82	Dexedrine 15 mg.	30
7	01/04/82	Sodium Amytal	30
	02/02/82	Sodium Amytal	30
	03/02/82	Sodium Amytal	30
	03/23/82	Sodium Amytal	30
	04/20/82	Sodium Amytal	30
	05/17/82	Sodium Amytal	30
	07/04/82	Sodium Amytal	30
	07/26/82	Sodium Amytal	30
	08/20/82	Sodium Amytal	30
	09/09/82	Sodium Amytal	30
	10/07/82	Sodium Amytal	30
	10/28/82	Sodium Amytal	30
11/29/82	Sodium Amytal	30	
8	03/23/82	Ritalin 10 mg.	20
	04/09/82	Dexedrine 15 mg.	30
	05/17/82	Dexedrine 15 mg.	30
	06/17/82	Dexedrine 15 mg.	30
	07/15/82	Dexedrine 15 mg.	30
	08/19/82	Dexedrine 15 mg.	30
	09/14/82	Dexedrine 15 mg.	30
	10/12/82	Dexedrine 15 mg.	30
	11/11/82	Dexedrine 15 mg.	30

9	01/28/82	Dexedrine 15 mg.	20
	03/05/82	Dexedrine 15 mg.	50
	04/09/82	Quaalude 300 mg.	30
	04/09/82	Dexedrine 15 mg.	30
	05/17/82	Quaalude 300 mg.	30
	05/17/82	Dexedrine 15 mg.	30
	06/16/82	Quaalude 300	30
10	02/01/82	Preludin 75 mg.	30
	02/23/82	Preludin 75 mg.	30
	03/23/82	Preludin 75 mg.	30
	04/23/82	Preludin 75 mg.	30
11	01/11/82	Sodium Amytal	60
	02/09/82	Sodium Amytal	60
	03/15/82	Sodium Amytal	60
	04/12/82	Sodium Amytal	60
	05/10/82	Sodium Amytal	60
12	01/15/82	Preludin 75 mg.	30
	02/12/82	Preludin 75 mg.	30
	03/18/82	Preludin 75 mg.	30
13	01/25/82	Preludin 75 mg.	30
	02/25/82	Preludin 75 mg.	30
	03/30/82	Preludin 75 mg.	30
14	11/24/82	Dexedrine 15 mg.	10
	11/27/82	Dexedrine 15 mg.	20
15	01/04/82	Preludin 75 mg.	30
	02/04/82	Preludin 75 mg.	30
	03/01/82	Preludin 75 mg.	30
16	01/18/82	Preludin 75 mg.	30
	02/19/82	Preludin 75 mg.	30
	03/08/82	Preludin 75 mg.	30
	03/25/82	Preludin 75 mg.	30
17	08/09/82	Preludin 75 mg.	30
	09/07/82	Preludin 75 mg.	30
	10/05/82	Preludin 75 mg.	30
	11/09/82	Preludin 75 mg.	30
	11/30/82	Preludin 75 mg.	30

18	01/22/82	Ritalin 10 mg.	60
	02/12/82	Ritalin 10 mg.	60
	03/04/82	Ritalin 10 mg.	60
	03/25/82	Ritalin 10 mg.	60
	04/09/82	Ritalin 10 mg.	60
	04/23/82	Ritalin 10 mg.	60
	05/07/82	Ritalin 10 mg.	60
	05/21/82	Ritalin 10 mg.	60
	06/03/82	Ritalin 10 mg.	60
	06/28/82	Ritalin 10 mg.	60
	07/16/82	Ritalin 10 mg.	60
	08/13/82	Ritalin 10 mg.	60
09/10/82	Ritalin 10 mg.	60	
10/08/82	Ritalin 10 mg.	60	
11/11/82	Ritalin 10 mg.	60	
19	02/01/82	Preludin 75 mg.	30
	03/01/82	Preludin 75 mg.	30
	04/05/82	Preludin 75 mg.	30
	05/03/82	Preludin 75 mg.	30
	05/28/82	Preludin 75 mg.	30
	07/02/82	Preludin 75 mg.	30
	07/30/82	Preludin 75 mg.	30
	09/03/82	Preludin 75 mg.	30
	10/01/82	Preludin 75 mg.	30
	10/29/82	Preludin 75 mg.	30
12/07/82	Preludin 75 mg.	30	
20	06/18/82	Preludin 75 mg.	30
	07/30/82	Preludin 75 mg.	30
	08/30/82	Preludin 75 mg.	30
	10/05/82	Preludin 75 mg.	30
	11/16/82	Preludin 75 mg.	30
	12/17/82	Preludin 75 mg.	30
21	01/29/82	Dexedrine 15 mg.	12
	02/09/82	Dexedrine 15 mg.	30
	04/09/82	Dexedrine 15 mg.	60
	05/24/82	Dexedrine 15 mg.	20
	09/27/82	Dexedrine 15 mg.	30
22	11/07/77	Sodium Amytal	80
	01/03/81	Sodium Amytal	80
	01/13/81	Sodium Amytal	80
	01/23/81	Sodium Amytal	80
	02/19/81	Sodium Amytal	80
	03/02/81	Sodium Amytal	80
	03/16/81	Sodium Amytal	80

22 (Con't)	03/31/81	Sodium Amytal	80
	04/10/81	Sodium Amytal	120
	04/29/81	Sodium Amytal	80
	06/02/81	Sodium Amytal	80
	01/02/82	Sodium Amytal	80
	01/08/82	Sodium Amytal	80
	01/13/82	Sodium Amytal	80
	01/18/82	Sodium Amytal	80
	01/22/82	Sodium Amytal	80
	01/28/82	Sodium Amytal	80
	02/02/82	Sodium Amytal	80
	02/08/82	Sodium Amytal	80
	02/12/82	Sodium Amytal	80
	02/18/82	Sodium Amytal	80
	02/23/82	Sodium Amytal	80
	02/28/82	Sodium Amytal	80
	03/05/82	Sodium Amytal	80
	03/15/82	Sodium Amytal	80
	03/19/82	Sodium Amytal	80
	03/25/82	Sodium Amytal	80
	03/30/82	Sodium Amytal	80
	04/02/82	Sodium Amytal	80
	04/08/82	Sodium Amytal	80
	04/14/82	Sodium Amytal	80
	04/19/82	Sodium Amytal	80
	04/23/82	Sodium Amytal	80
	04/29/82	Sodium Amytal	80
	05/04/82	Sodium Amytal	80
	05/10/82	Sodium Amytal	80
	05/20/82	Sodium Amytal	80
	05/25/82	Sodium Amytal	120
	06/11/82	Sodium Amytal	80
	06/16/82	Sodium Amytal	80
	06/22/82	Sodium Amytal	80
	06/28/82	Sodium Amytal	100
	07/03/82	Sodium Amytal	80
	07/09/82	Sodium Amytal	80
	07/15/82	Sodium Amytal	80
	07/20/82	Sodium Amytal	80
	07/24/82	Sodium Amytal	80
	07/27/82	Sodium Amytal	80
	08/01/82	Sodium Amytal	80
	08/04/82	Sodium Amytal	80
	08/08/82	Sodium Amytal	80
	08/13/82	Sodium Amytal	80
	08/19/82	Sodium Amytal	80
	08/24/82	Sodium Amytal	80
	08/30/82	Sodium Amytal	80
	09/02/82	Sodium Amytal	80
	09/07/82	Sodium Amytal	80
	09/13/82	Sodium Amytal	80

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22 (Con't)	09/17/82	Sodium Amytal	80
	09/24/82	Sodium Amytal	80
	10/01/82	Sodium Amytal	80
	10/07/82	Sodium Amytal	80
	10/12/82	Sodium Amytal	80
	10/15/82	Sodium Amytal	80
	10/25/82	Sodium Amytal	80
	10/29/82	Sodium Amytal	80
	11/16/82	Sodium Amytal	60
	11/20/82	Sodium Amytal	60
	11/26/82	Sodium Amytal	80
23	07/26/82	Dexedrine 15 mg.	30
	09/10/82	Dexedrine 15 mg.	30
	10/14/82	Dexedrine 15 mg.	30
	11/16/82	Dexedrine 15 mg.	30

2. On or about September 9, 1982, in your office located at 295 Glessner Avenue, Mansfield, Ohio, you prescribed fifteen (15) tablets of Dexedrine 10 mg., a Schedule II controlled substance, and twelve (12) tablets of Restoril 30 mg., a Schedule IV controlled substance, for a patient identified as Lorie Kouba, also known as Lorie Kouba, Agent for the Mansfield Police Department. Agent Kouba paid twenty four dollars (\$24) for the office visit.

During the office visit, the patient complained of being rundown and noted that she had a cold. After you interviewed the patient, you prescribed said drugs. You prescribed the Dexedrine tablets specifically to aid the patient in staying awake.

3. On or about September 23, 1982, in your office located at 295 Glessner Avenue, Mansfield, Ohio, you prescribed forty (40) tablets of Dexedrine 10 mg., a Schedule II controlled substance, and thirty (30) tablets of Restoril 30 mg., a Schedule IV controlled substance, for a patient identified as Lorie Kouba, also known as Lorie Kouba, Agent for the Mansfield Police Department. Agent Kouba paid nineteen dollars (\$19) for the office visit.

During the office visit, the patient complained about her busy work schedule and wanted the prescriptions issued by you on September 9, 1982, renewed. Other than discussing the patients' reactions to the medicines and discussing the patient's daily activities, no physical examination was performed.

4. On or about November 30, 1982, in your office located at 295 Glessner Avenue, Mansfield, Ohio, you prescribed twenty (20) tablets of Dexedrine 15 mg. spansules, a Schedule II controlled substance, to a patient identified as Carol M. Smith, also known as Carol Soulen, Agent for the Mansfield Police Department. Agent Soulen paid twenty four dollars (\$24) for the office visit.

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During the office visit, the patient complained of being tired because of a busy work schedule and noted that she had a cold. After interviewing the patient, you prescribed the Dexedrine tablets for fatigue.

5. On or about January 4, 1983, in your office located at 295 Glessner Avenue, Mansfield, Ohio, you prescribed thirty (30) tablets of Dexedrine 15 mg., a Schedule II controlled substance, to a patient identified as Carol M. Smith, also known as Carol Soulen, Agent for the Mansfield Police Department. Agent Soulen paid nineteen dollars (\$19) for the office visit.

During the office visit, the patient complained of a busy daily schedule and wanted her prescription issued by you on November 30, 1982, renewed. After interviewing the patient and taking her blood pressure, temperature, heart rate, and weight, you prescribed the Dexedrine tablets to aid the patient in staying awake.

Your acts, conduct, or omissions, as described in paragraphs 1 through 5, individually or collectively, constitute, "failure to use reasonable care discrimination in the administration of drugs, or failure to employ acceptable scientific methods in the selection of drugs or other modalities for treatment of disease," as one or all of those clauses are used in Section 4731.22(B)(2), Ohio Revised Code.

Further, your acts, conduct, or omissions, as described in paragraphs 1 through 5, individually or collectively, constitute, "selling, prescribing, giving away, or administering drugs for other than legal and legitimate therapeutic purposes...", as that clause is used in Section 4731.22(B)(3), Ohio Revised Code.

Further, your acts, conduct, or omissions as described in paragraphs 1 through 5, individually or collectively, constitute, "a departure from, or the failure to conform to, minimal standards of care of similar practitioners under the same or similar circumstances, whether or not actual injury to a patient is established," as that clause is used in Section 4731.22(B)(6), Ohio Revised Code.

Pursuant to Chapter 119., Ohio Revised Code, please be advised that you may request a hearing on this matter. If you wish to request such a hearing, that request must be made within thirty (30) days of the time of mailing of this notice.

You are further advised that you are entitled to appear at such a hearing in person, or by your attorney, or you may present your position, arguments, or contentions in writing, or that at the hearing you may present evidence and examine witnesses appearing for or against you.

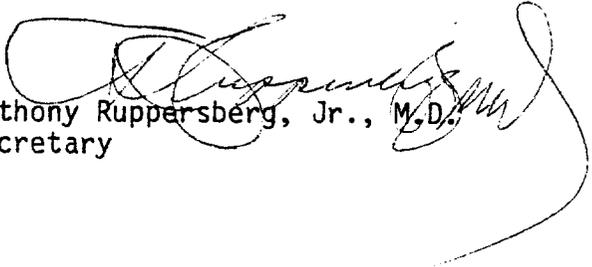
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In the event there is no request for such a hearing made within thirty (30) days of the time of mailing of this notice, the State Medical Board of Ohio may, in your absence and upon consideration of this matter, determine whether or not to limit, reprimand, revoke, suspend, place on probation, refuse to register, or reinstate your certificate to practice medicine or surgery in the State of Ohio.

Please find enclosed copies of all referenced statutes.

Very truly yours,


Anthony Ruppertsberg, Jr., M.D.
Secretary

AR:jmb

Enclosures:

CERTIFIED MAIL #P349 641 956
RETURN RECEIPT REQUESTED