

SEP 20 1988

CONSENT AGREEMENT
BETWEEN
RUSSELL N. BROWN, M.D.
AND
THE STATE MEDICAL BOARD OF OHIO

This CONSENT AGREEMENT is entered into by and between RUSSELL N. Brown M.D. and THE STATE MEDICAL BOARD OF OHIO, a state agency charged with enforcing Chapter 4731, Ohio Revised Code.

RUSSELL N. BROWN M.D. enters into this Agreement being fully informed of his/~~her~~ rights under Chapter 119, Ohio Revised Code, including the right to representation by counsel and the right to a formal adjudicative hearing on the issues considered herein.

This CONSENT AGREEMENT is entered into on the basis of the following stipulations, admissions and understandings:

1. RUSSELL N. BROWN, M.D. ADMITS that in completing his/her renewal application card for registration of his/her certificate to practice medicine or surgery for the 1987-1988 biennial registration period, he/she did certify that he/she completed during the preceding biennium the requisite hours of continuing medical education, as required by Section 4731.281, Revised Code.
2. RUSSELL N. BROWN, M.D. ADMITS that, in fact, he/she had not completed the requisite hours of continuing medical education as required by Section 4731.281, Revised Code, at the time of certification, but did complete the requisite hours subsequently.

WHEREFORE, in consideration of the foregoing and mutual promises hereinafter set forth, and in lieu of any formal proceedings at this time, RUSSELL N. BROWN, M.D. knowingly and voluntarily agrees with THE STATE MEDICAL BOARD OF OHIO to the following conditions and limitations:

- A. That within thirty (30) days after the end of each of the next three (3) biennial registration periods following the effective date of this agreement, RUSSELL N. BROWN M.D. shall submit documentation acceptable to the Board of satisfactory completion of the requisite hours of continuing medical education.
- B. That should RUSSELL N. BROWN M.D. elect not to renew his/~~her~~ Ohio license during the duration of this agreement, RUSSELL BROWN M.D. shall notify the BOARD in writing. Periods of time during which RUSSELL Brown M.D. does not maintain his license as current will not apply to the reduction of the three (3) biennial registration periods for which documentation must be submitted.

Any action initiated by the Board based on alleged violations of this CONSENT AGREEMENT shall comply with the Administrative Procedure Act, Chapter 119., Ohio Revised Code.

It is AGREED and UNDERSTOOD by and between both parties that this CONSENT AGREEMENT shall be considered a public record as that term is used in Section 149.43, Ohio Revised Code.

RUSSELL N. BROWN M.D. hereby releases THE STATE MEDICAL BOARD OF OHIO, its members, employees, agents and officers, individually and collectively, jointly and severally, from any and all liability arising from the within matter.

FOR THE STATE MEDICAL BOARD

Russell N. Brown
RUSSELL N. BROWN, M.D.

Henry G. Cramblett
HENRY G. CRAMBLETT, M.D.
SECRETARY

September 14, 1988
DATE

11/55
DATE

John E. Rauch SEP 20 1988
JOHN E. RAUCH, D.O.
SUPERVISING MEMBER

10/21/88
DATE

Cheryl J. Nester
CHERYL J. NESTER
ASSISTANT ATTORNEY GENERAL

10-23-88
DATE