

**CONSENT AGREEMENT  
BETWEEN  
MAURICE CONVERSE, M.D. AND  
THE STATE MEDICAL BOARD OF OHIO**

This Consent Agreement is entered into by and between MAURICE CONVERSE, M.D. and THE STATE MEDICAL BOARD OF OHIO, a state agency charged with enforcing Chapter 4731., Ohio Revised Code.

MAURICE CONVERSE, M.D., voluntarily enters into this Consent Agreement being fully informed of his 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 contains the entire Consent Agreement between the parties, there being no other Consent Agreement of any kind, verbal or otherwise, which varies the terms of this Consent Agreement.

**BASIS FOR ACTION**

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

- A. THE STATE MEDICAL BOARD OF OHIO is empowered by Section 4731.22(B), Ohio Revised Code, to limit, revoke, suspend a certificate, refuse to register or reinstate an applicant, or reprimand or place on probation the holder of a certificate for any of the enumerated violations.
- B. THE STATE MEDICAL BOARD OF OHIO enters into this Consent Agreement in lieu of further formal proceedings based upon the violation of Section 4731.22(B)(22), Ohio Revised Code set forth in the Notice of Opportunity for Hearing issued by the BOARD on August 11, 1999, attached hereto as Exhibit A and incorporated herein by this reference. The BOARD further enters into this Consent Agreement in lieu of formal proceedings based upon the violations of R.C. 4731.22(A) and R.C. 4731.22(B)(5) as set forth in Paragraph E below. The BOARD expressly reserves the right to institute additional formal proceedings based upon any other violations of Chapter 4731 of the Ohio Revised Code whether occurring before or after the effective date of this Consent Agreement.
- C. MAURICE CONVERSE, M.D., is licensed to practice medicine and surgery in the State of Ohio.

MAURICE CONVERSE, M.D., STATES that he is not licensed to practice medicine or surgery in any other state or jurisdiction.

- D. MAURICE CONVERSE, M.D., ADMITS the factual and legal allegations set forth in the Notice of Opportunity for Hearing issued by the BOARD on August 11, 1999, attached hereto as Exhibit A and incorporated herein by reference.
- E. MAURICE CONVERSE, M.D., further ADMITS that in completing his application card for renewal of his certificate to practice medicine in Ohio for the 1996 – 1998 biennial registration period, he certified that, during the preceding period of acquisition of continuing medical education (“CME”) [that is, July 1, 1994 through June 30, 1996], he had completed the requisite hours of CME, as required by Section 4731.281, Ohio Revised Code. MAURICE CONVERSE, M.D., further ADMITS that, in fact, he had not completed the requisite hours of CME due to health reasons.
- F. MAURICE CONVERSE, M.D., further STATES, and the BOARD ACKNOWLEDGES, that he completed the requisite hours of CME for the July 1, 1996 through June 30, 1998 CME acquisition period, and that he has completed the requisite hours of CME for the current period of CME acquisition, that is July 1, 1998 through January 1, 2001.

#### **AGREED CONDITIONS**

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

#### **REPRIMAND**

- I. MAURICE CONVERSE, M.D., is hereby REPRIMANDED.

#### **MANDATORY AUDITS**

- II. The certificate of MAURICE CONVERSE, M.D., to practice medicine and surgery shall be subject to mandatory audits of compliance with CME requirements for the current CME acquisition period, and for two full CME acquisition periods thereafter, during which time MAURICE CONVERSE, M.D., shall submit documentation acceptable to the BOARD of satisfactory completion

of the requisite hours of CME. This documentation shall be due in the BOARD's offices within thirty (30) days of the conclusion of each CME acquisition period.

### **REQUIRED REPORTING BY LICENSEE**

- III. Within thirty (30) days of the effective date of this Consent Agreement, MAURICE CONVERSE, M.D. shall provide a copy of this Consent Agreement to all employers or entities with which he is under contract to provide health care services or is receiving training; and the Chief of Staff at each hospital where he has privileges or appointments. Further, MAURICE CONVERSE, M.D., shall provide a copy of this Consent Agreement to all employers or entities with which he contracts to provide health care services, or applies for or receives training, and the Chief of Staff at each hospital where he applies for or obtains privileges or appointments.
- IV. Within thirty (30) days of the effective date of this Consent Agreement, MAURICE CONVERSE, M.D., shall provide a copy of this Consent Agreement by certified mail, return receipt requested, to the proper licensing authority of any state or jurisdiction in which he currently holds any professional license. MAURICE CONVERSE, M.D., further agrees to provide a copy of this Consent Agreement by certified mail, return receipt requested, at time of application to the proper licensing authority of any state in which he applies for any professional license or reinstatement of any professional license. Further, MAURICE CONVERSE, M.D., shall provide this BOARD with a copy of the return receipt as proof of notification within thirty (30) days of receiving that return receipt.

### **FAILURE TO COMPLY**

If, in the discretion of the Secretary and Supervising Member of THE STATE MEDICAL BOARD OF OHIO, MAURICE CONVERSE, M.D., appears to have violated or breached any term or condition of this Consent 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 Consent Agreement.

If the Secretary and Supervising Member of the BOARD determine that there is clear and convincing evidence that MAURICE CONVERSE, M.D., has violated any term, condition or limitation of this Consent Agreement, MAURICE CONVERSE, M.D., agrees that the violation, as alleged, also constitutes clear and convincing evidence that his continued practice presents a danger of immediate and serious harm to the public for the purposes of initiating a summary suspension pursuant to Section 4731.22(G), Ohio Revised Code.

**MODIFICATION OF TERMS**

The above described terms, limitations and conditions may be amended or terminated in writing at any time upon the agreement of both parties.

Periods of time during which MAURICE CONVERSE, M.D.'s certificate to practice medicine and surgery is inactive due to nonpayment of renewal fees will not apply to the reduction of the time periods set forth in this Consent Agreement, unless otherwise determined by motion of the BOARD in instances where the BOARD can be assured that the purposes of the probationary monitoring will be fulfilled.

**ACKNOWLEDGMENTS/LIABILITY RELEASE**

MAURICE CONVERSE, M.D., acknowledges that he has had an opportunity to ask questions concerning the terms of this Consent Agreement and that all questions asked have been answered in a satisfactory manner.

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.

MAURICE CONVERSE, M.D., hereby releases the STATE MEDICAL BOARD OF OHIO, its members, employees, agents, officers and representatives jointly and severally from any and all liability arising from the within matter.

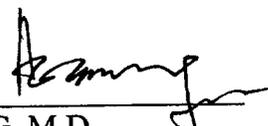
This Consent Agreement shall be considered a public record as that term is used in Section 149.43, Ohio Revised Code. Further, this information may be reported to appropriate organizations, data banks and governmental bodies.

**EFFECTIVE DATE**

It is expressly understood that this Consent Agreement is subject to ratification by the BOARD prior to signature by the Secretary and Supervising Member and shall become effective upon the last date of signature below.

  
MAURICE CONVERSE, M.D.

11-2-99  
DATE

  
ANAND G. GARG, M.D.  
Secretary

11-18-99  
DATE

*Raymond J. Albert / per*  
RAYMOND J. ALBERT  
Supervising Member  
*per telephone*  
*call.*  
11-19-99  
DATE

*Anne Berry Strait*  
ANNE BERRY STRAIT  
Assistant Attorney General  
11/17/99  
DATE



# State Medical Board of Ohio

77 S. High Street, 17th Floor • Columbus, Ohio 43266-0313 • 614/ 466-3934 • Website: www.state.oh.us/med/

August 11, 1999

Maurice Converse, M.D.  
P.O. Box 5379  
Akron, Ohio 44313

Dear Doctor Converse:

In accordance with Chapter 119., Ohio Revised Code, you are hereby notified that the State Medical Board of Ohio intends to determine whether or not to limit, revoke, permanently 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 March 17, 1999, you entered into a Consent Order with the Michigan Board of Medicine Disciplinary Subcommittee (hereinafter the "Michigan Board") wherein the Michigan Board accepted the permanent surrender of your Michigan license. The Michigan Board accepted the permanent surrender of your license as a means of resolving the September 9, 1998 Michigan Board Administrative Complaint, which alleged that you failed to submit satisfactory evidence that you had obtained the 150 hours of continuing education credit, during the period February 1, 1995 through January 31, 1998, that was required for renewal of your Michigan license.

The Consent Order further indicates that you agreed the Michigan Board could treat the Administrative complaint as true; that you stipulated you were physically unable to complete the above Michigan continuing education due to health reasons; and that having retired from your part-time Michigan practice, your primary practice is in Ohio.

Copies of the Michigan Consent Order and Stipulation and Administrative Complaint are attached hereto and fully incorporated herein.

The Michigan Board Consent Order and Stipulation, as alleged in paragraph (1) above, constitutes "[a]ny of the following actions taken by the state agency responsible for regulating the practice of medicine and surgery, osteopathic medicine and surgery, podiatry, or the limited branches of medicine in another state, for any reason other than the nonpayment of fees: the limitation, revocation, or suspension of an individual's license to practice; acceptance of an individual's license surrender; denial of a license; refusal to renew or reinstate a license; imposition of probation; or issuance of an order of censure or other reprimand;" as that language is used in Section 4731.22(B)(22), Ohio Revised Code.

*Mailed 8/12/99*

Maurice Converse, M.D.

Page 2

Pursuant to Chapter 119., Ohio Revised Code, you are hereby advised that you are entitled to a hearing in this matter. If you wish to request such hearing, the request must be made in writing and must be received in the offices of the State Medical Board within thirty (30) days of the time of mailing of this notice.

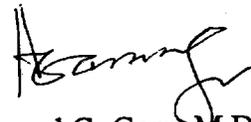
You are further advised that you are entitled to appear at such hearing in person, or by your attorney, or by such other representative as is permitted to practice before this agency, or you may present your position, arguments, or contentions in writing, and that at the hearing you may present evidence and examine witnesses appearing for or against you.

In the event that there is no request for such hearing received within thirty (30) days of the time of mailing of this notice, the State Medical Board may, in your absence and upon consideration of this matter, determine 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.

Please note that, whether or not you request a hearing, Section 4731.22(L), Ohio Revised Code, effective March 9, 1999, provides that "[w]hen the board refuses to grant a certificate to an applicant, revokes an individual's certificate to practice, refuses to register an applicant, or refuses to reinstate an individual's certificate to practice, the board may specify that its action is permanent. An individual subject to a permanent action taken by the board is forever thereafter ineligible to hold a certificate to practice and the board shall not accept an application for reinstatement of the certificate or for issuance of a new certificate."

Copies of the applicable sections are enclosed for your information.

Very truly yours,



Anand G. Garg, M.D.  
Secretary

AGG/jag  
Enclosures

CERTIFIED MAIL # Z 233 896 426  
RETURN RECEIPT REQUESTED

STATE OF MICHIGAN  
DEPARTMENT OF CONSUMER & INDUSTRY SERVICES  
OFFICE OF HEALTH SERVICES  
BOARD OF MEDICINE  
DISCIPLINARY SUBCOMMITTEE

In the Matter of

MAURICE CONVERSE, M.D.  
License Number: 43-01-024090

File Number: 43-98-1481-00  
CONSENT ORDER AND STIPULATION

CONSENT ORDER

WHEREAS, an Administrative Complaint was issued on September 9, 1998, charging Maurice Converse, M.D., hereafter Respondent, with having violated section 16221(g) of the Public Health Code, 1978 PA 368, as amended; MCL 333.1101 et seq; MSA 14.15(1101) et seq; and

WHEREAS, Respondent neither admits nor denies the allegations of fact and law set forth in the Administrative Complaint but agrees that the Disciplinary Subcommittee of the Board of Medicine may treat the allegations as true, which finding shall have the same force and effect for purposes of this Consent Order as if evidence and argument were presented in support of the allegations. Further, Respondent understand and intends that by so stating Respondent is not admitting to the truth of the allegations, but is agreeing that the Disciplinary Subcommittee may enter its order treating the allegations as true for purposes of resolution of the Complaint.

WHEREAS, by Stipulation submitted herewith, Respondent has agreed to voluntarily surrender to the Board of Medicine the license to practice medicine previously issued to Respondent by the Board pursuant to the Public Health Code; and

WHEREAS, the Board's Disciplinary Subcommittee has reviewed the Stipulation and, based upon the matters asserted therein, agrees that the public interest is best served by resolution of the outstanding Complaint; now, therefore,

IT IS HEREBY FOUND that the allegations of fact and law set forth in the Complaint are true and constitute violations of section 16221(g) of the Public Health Code, supra.

Accordingly,

IT IS HEREBY ORDERED that Respondent's license to practice medicine in the state of Michigan shall be and hereby is PERMANENTLY SURRENDERED, commencing on the effective date of this order.

IT IS FURTHER ORDERED that the surrender of licensure shall be deemed permanent and that said license shall not be renewed, reinstated, reissued or reactivated, limited or otherwise, at any future date.

IT IS FURTHER ORDERED that this order shall not be modifiable for any cause whatsoever.

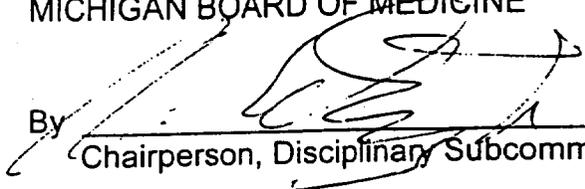
STATE BOARD OF MEDICINE  
MICHIGAN  
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FOR THE BOARD OF MEDICINE — REGISTERED  
I hereby certify the foregoing to be a true  
copy of the original on file in the office  
of the Department of Consumer and Industry  
Services, Office of Health Services.

IT IS FURTHER ORDERED that this order shall be effective 30 days from the date signed by the Disciplinary Subcommittee as set forth below.

Dated: 3/17/99

MICHIGAN BOARD OF MEDICINE

By   
Chairperson, Disciplinary Subcommittee

STIPULATION

1. The allegations of fact contained in the Administrative Complaint dated September 9, 1998, are true and constitute violations of section 16221(g) of the Public Health Code.
2. Respondent agrees to permanently surrender to the Board the license to practice medicine previously issued to Respondent pursuant to the Public Health Code, supra.
3. Respondent further agrees to relinquish any claim to reinstate, renew, reissue, or reactivate said license, limited or otherwise, at any future date.
4. Respondent understands that by permanently surrendering to the Board the license to practice medicine, Respondent's controlled substance license is automatically void and cannot be renewed.

5. Respondent understands and intends that by signing this Stipulation Respondent is waiving the right pursuant to the Public Health Code, supra, the rules promulgated pursuant thereto, and the Administrative Procedures Act of 1969, 1969 PA 306, as amended; MCL 24.201 et seq; MSA 3.560(101) et seq, to require Complainant to prove the charges set forth in the Administrative Complaint by presentation of evidence and legal authority, and to appear with an attorney and such witnesses as Respondent may desire to present a defense to said charges.

6. Factors considered in the formulation of the within consent order were as follows:

- a) Respondent was physically unable to complete continuing education during the period of February 1, 1995, to January 31, 1998, due to health related reasons.
- b) Respondent's primary practice is in the state of Ohio. Respondent practiced part-time in Michigan. Respondent has retired from his part-time practice in Michigan.
- c) Respondent did not deliberately violate the Public Health Code, but inadvertently responded incorrectly on the licensure renewal form.

7. Douglas Mack, M.D., a member of the Board who supports this proposal, and Complainant's representative are both free to discuss this matter with the Disciplinary Subcommittee and recommend acceptance of the resolution set forth in the foregoing Consent Order.

STATE OF MICHIGAN  
DEPARTMENT OF HEALTH SERVICES  
DIVISION OF PROFESSIONAL REGULATION  
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JAN 27 11:23 AM '98  
STATE OF MICHIGAN  
DEPARTMENT OF HEALTH SERVICES  
DIVISION OF PROFESSIONAL REGULATION

8. The foregoing Consent Order is approved by Respondent and Complainant and may be entered as the final order in this case.

9. The foregoing proposal is conditioned upon acceptance by the Disciplinary Subcommittee, Respondent and Complainant expressly reserving the right to further proceedings without prejudice should the Consent Order be rejected.

AGREED TO BY:

Thomas C. Lindsay  
Thomas C. Lindsay II, Director  
Office of Health Services  
Complainant  
Dated: February 12, 1999

AGREED TO BY:

Maurice Converse, M.D.  
Maurice Converse, M.D.  
Respondent

Dated: 2/2/99

State of Ohio )  
County of LUCAS ) ss

On the 2nd day of February, 1999, before me, a Notary Public in and for said county, appeared Maurice Converse, M.D., who, upon oath, stated that he has read the foregoing Consent Order and Stipulation by him subscribed, that he knows the contents thereof to be true, and that the signing of said Consent Order and Stipulation is his free act and deed.

[Signature]

Notary Public, LUCAS County  
State of Ohio  
My Commission expires

WARD A. SPINABERRY, Attorney at Law  
Notary Public, State of Ohio  
My Commission has no expiration date.  
Section 147.03 O.R.C.

This is the last and final page of a Consent Order and Stipulation in the matter of Maurice Converse, M.D., File Number 43-98-1481-00, before the Disciplinary Subcommittee of the Michigan Board of Medicine, consisting of five pages, this page included.

DVC

WARD A. SPINABERRY, Attorney at Law  
Notary Public, State of Ohio  
My Commission has no expiration date.  
Section 147.03 O.R.C.

STATE OF MICHIGAN  
DEPARTMENT OF CONSUMER & INDUSTRY SERVICES  
OFFICE OF HEALTH SERVICES  
BOARD OF MEDICINE  
DISCIPLINARY SUBCOMMITTEE

In the Matter of

MAURICE CONVERSE, M.D.  
License Number: 43-01-024090

File Number: 43-98-1481-00

ADMINISTRATIVE COMPLAINT

COMPLAINANT, the Michigan Department of Consumer & Industry Services, by Thomas C. Lindsay II, Director, Office of Health Services, files this complaint against Respondent, Maurice Converse, M.D., and SAYS:

1. The Michigan Board of Medicine, hereafter Board, is an administrative agency established by the Public Health Code, 1978 PA 368, as amended; MCL 333.1101 et seq; MSA 14.15(1101) et seq. Pursuant to section 16226 of the Public Health Code supra, the Board's Disciplinary Subcommittee is empowered to discipline licensees for violations of the Code.

2. Respondent is currently licensed to practice medicine in the state of Michigan and holds a current controlled substance license.

STATE OF MICHIGAN  
BOARD OF MEDICINE  
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3. Respondent failed, upon demand, to submit satisfactory evidence demonstrating that Respondent obtained the 150 hours of continuing education credit during the period of February 1, 1995, through January 31, 1998, required for license renewal. Respondent submitted evidence of obtaining 119 acceptable credit hours during that period.

COUNT I

Respondent's conduct, as set forth above, evidences a failure to complete not less than 150 hours of Board-approved continuing education required for license renewal, in violation of 1991 MR 12, R 338.2371, which constitutes a violation of section 16221(g) of the Public Health Code, supra.

COUNT II

Respondent's conduct, as set forth above, evidences a failure to submit evidence upon demand demonstrating compliance with continuing education requirements for license renewal, in violation of 1991 MR 12, R 338.2381(2) and section 17033(1) of the Public Health Code, supra, which constitutes violations of section 16221(g) of the Public Health Code, supra.

WHEREFORE, Complainant requests that the within complaint be served upon Respondent and that Respondent be offered an opportunity to show compliance with all lawful requirements for retention of the license. If compliance is not shown, Complainant further

STATE OF MICHIGAN — INGHAM COUNTY  
We certify that the foregoing is a true  
copy of the original on file in the office  
of the Department of Consumer and Industry  
Services, Office of Health Services.

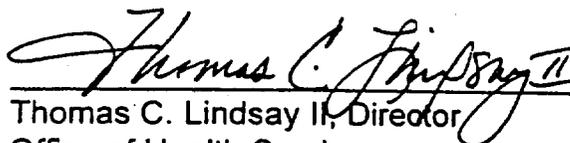
STATE MEDICAL BOARD  
OF MICHIGAN  
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requests that formal proceedings be commenced pursuant to the Public Health Code, rules promulgated thereunder, and the Administrative Procedures Act of 1969, 1969 PA 306, as amended; MCL 24.201 et seq; MSA 3.560(101) et seq.

RESPONDENT IS HEREBY NOTIFIED that pursuant to section 16231(7) of the Public Health Code, supra, Respondent has 30 days from the date of receipt of this complaint to submit a written response to the allegations contained herein. The written response shall be submitted to Complainant, Thomas C. Lindsay II, Director, Office of Health Services, Department of Consumer & Industry Services, P.O. Box 30670, Lansing, MI 48909.

RESPONDENT IS FURTHER NOTIFIED that pursuant to section 16231(8) of the Public Health Code, supra, Respondent's failure to submit a written response within 30 days, as noted above, shall be treated as an admission of the allegations contained herein and shall result in transmittal of this complaint directly to the Disciplinary Subcommittee for imposition of an appropriate sanction.

DATED: *September 9, 1998*

  
Thomas C. Lindsay II, Director  
Office of Health Services

STATE MEDICAL BOARD  
OF MICHIGAN  
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This is the last and final page of an Administrative Complaint in the matter of Maurice Converse, M.D., File Number 43-98-1481-00, before the Disciplinary Subcommittee of the Michigan Board of Medicine, consisting of three pages, this page included.

DVC

UNRECORDED COPY - MICHAIGAN COUNTY  
The foregoing is a true  
copy of the original on file in the office  
of the Department of Consumer and Industry  
Services, Office of Health Services.