

**CONSENT AGREEMENT  
BETWEEN  
ROLAND BURELLI, M.D.  
AND  
THE STATE MEDICAL BOARD OF OHIO**

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

ROLAND BURELLI, M.D. enters into this 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 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)(6), 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 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.
- B. THE STATE MEDICAL BOARD OF OHIO enters into this Consent Agreement in lieu of formal proceedings based upon violation of Section 4731.22(B)(6) of the Revised Code, and expressly reserves the right to institute formal proceedings based upon any other violations of Chapter 4731. of the Revised Code, whether occurring before or after the effective date of this Agreement.
- C. ROLAND BURELLI, M.D. is licensed to practice medicine and surgery in the State of Ohio.
- D. DOCTOR BURELLI ADMITS that in 1987 a \$300,000 malpractice settlement was paid on his behalf and in 1990 a \$150,000 malpractice settlement was paid on his behalf. Both of these cases involved a failure to diagnose abscesses after gynecological procedures and a failure to administer appropriate antibiotics.

WHEREFORE, in consideration of the foregoing and mutual promises hereinafter set forth, and in lieu of any formal proceedings at this time, ROLAND BURELLI, M.D. knowingly and voluntarily agrees with THE STATE MEDICAL BOARD OF OHIO, (hereinafter "SMBO"), to the following:

1. The certificate of DOCTOR BURELLI to practice medicine and surgery in the State of Ohio shall be SUSPENDED for a period of one (1) year. Such suspension is STAYED, subject to the following PROBATIONARY terms, conditions, and limitations for a period of two (2) years.
2. DOCTOR BURELLI shall obey all federal, state and local laws, and all rules governing the practice of medicine in Ohio;

92 JUN 15 AM 11:57

CONSENT AGREEMENT  
ROLAND BURELLI, M.D.  
PAGE TWO

92 JUN 15 AM 11:57

3. DOCTOR BURELLI shall submit quarterly declarations under penalty of perjury stating whether there has been compliance with all the conditions of this Consent Agreement;
4. DOCTOR BURELLI shall be permanently prohibited from undertaking the care of any new patient; and
5. DOCTOR BURELLI shall be permanently prohibited from performing any surgical and/or invasive gynecological procedures or obstetrics in any manner.

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

If, in the discretion of the Secretary of THE STATE MEDICAL BOARD OF OHIO, DOCTOR BURELLI appears to have violated or breached any term or condition 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.

DOCTOR BURELLI acknowledges that he has had an opportunity to ask questions concerning the terms of this 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.

DOCTOR BURELLI 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.

CONSENT AGREEMENT  
ROLAND BURELLI, M.D.  
PAGE THREE

92 JUN 15 AM 11:57

This CONSENT AGREEMENT shall be considered a public record as that term is used in Section 149.43, Ohio Revised Code, and shall become effective upon the last date of signature below.

Further, this information may be reported to appropriate organizations, data banks and governmental bodies.

Robert Burelli, M.D.  
ROLAND BURELLI, M.D.

6/13/1992  
DATE

Carla S. O'Day  
CARLA S. O'DAY, M.D.  
Secretary

6/16/92  
DATE

Timothy S. Jost  
TIMOTHY S. JOST, ESQ.  
Supervising Member

6/16/92  
DATE

Odella Lampkin  
ODELLA LAMPKIN, ESQ.  
Assistant Attorney General

6/23/92  
DATE