

**CONSENT AGREEMENT  
BETWEEN  
EUSEBIO SUBIAS, M.D.  
AND  
THE STATE MEDICAL BOARD OF OHIO**

STATE MEDICAL BOARD OF OHIO  
90 MAY 10 AM 10:21

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

DR. SUBIAS 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 adjudication of 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 Sections 4731.22(A) and (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 violation of any of the subsections enumerated thereunder.
- B. THE STATE MEDICAL BOARD OF OHIO enters into this CONSENT AGREEMENT in lieu of further formal proceedings based upon the alleged violation of Sections 4731.22(A) and 4731.22(B)(5), Ohio 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 CONSENT AGREEMENT.
- C. DR. SUBIAS admits that on or about October 2, 1988, he signed the biennial renewal card to renew his license to practice medicine and surgery in Ohio. DR. SUBIAS admits that on that renewal card, he responded "NO" to the question "At any time since signing your last application for renewal of your certification have you had any disciplinary action taken or initiated against you by a state licensing agency?" DR. SUBIAS further admits that on or about July 13, 1987, the Board of Medicine, Department of Professional Regulation of the State of Florida,

filed an Administrative Complaint against him<sup>3</sup> alleging various violations of the laws of the State of Florida regulating the practice of medicine.

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

- A. DR. SUBIAS is hereby publicly reprimanded.
- B. DR. SUBIAS agrees not to practice medicine or surgery in any way in the State of Ohio after the effective date of this CONSENT AGREEMENT.
- C. DR. SUBIAS agrees that he will not renew his current license to practice medicine and surgery in the State of Ohio and that he will not ever seek or apply for such a license in the future. The parties further stipulate that if DR. SUBIAS applies for renewal or licensure, the BOARD shall be under no obligation to process said application.

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 BOARD, DR. SUBIAS appears to have violated or breached any terms or conditions of this CONSENT AGREEMENT, the BOARD 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.

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.

DR. SUBIAS acknowledges that he has been adequately represented by counsel throughout this matter and 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.

DR. SUBIAS hereby releases the BOARD, 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, and shall become effective upon the last date of signature below.

STATE OF OHIO  
MAY 10 1990

Eusebio Subias, M.D.  
EUSEBIO SUBIAS, M.D.

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

May 4, 1990  
DATE

5/9/90  
DATE

Gregory W. Kirstein  
GREGORY W. KIRSTEIN  
Attorney for Dr. Subias

John E. Rauch, D.O.  
JOHN E. RAUCH, D.O.  
Supervising Member

May 7, 1990  
DATE

5/10/90  
DATE

John C. Dowling  
JOHN C. DOWLING  
Assistant Attorney General

5/10/90  
DATE

9309S

STATE OF OHIO  
THE STATE MEDICAL BOARD  
77 SOUTH HIGH STREET  
17TH FLOOR  
COLUMBUS OH 43215

December 6, 1989

Eusebio Subias, M.D.  
1711 Buchanan Street  
Hollywood, FL 33020

Dear Doctor Subias:

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, 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 October 2, 1988, you signed the biennial renewal card to renew your license to practice medicine and surgery in Ohio. You responded "No" to the question "At any time since signing your last application for renewal of your certification have you had any disciplinary action taken or initiated against you by a state licensing agency?" In fact, on or about July 13, 1987, the Florida Board of Medicine, Department of Professional Regulation, initiated a disciplinary action against you.

Your acts, conduct, and omissions as alleged in the above paragraph (1), individually and/or collectively, constitute "fraud, misrepresentation, or deception in applying for or securing any license or certificate issued by the board", as that clause is used in Section 4731.22(A), Ohio Revised Code.

Further, your acts, conduct, and/or omissions as alleged in the above paragraph (1), individually and/or collectively, constitute "publishing a false, fraudulent, deceptive, or misleading statement," as that clause is used in Section 4731.22(B)(5), Ohio Revised Code.

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.

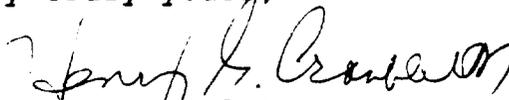
Esuebio Subias, M.D.  
Page Two

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 the 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.

Copies of the applicable sections are enclosed for your information.

Very truly yours,



Henry G. Cramblett, M.D.  
Secretary

HGC:jmb

Enclosures:

CERTIFIED MAIL #P 746 510 113  
RETURN RECEIPT REQUESTED