

**CONSENT AGREEMENT  
BETWEEN  
KAREN L. PAJARI, M.D.  
AND  
THE STATE MEDICAL BOARD OF OHIO**

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

KAREN L. PAJARI, M.D., voluntarily enters into this CONSENT AGREEMENT being fully informed of 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 contains the entire agreement between the parties, there being no other agreement of any kind, verbal or otherwise, which varies the terms of this CONSENT AGREEMENT.

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 violations of Section 4731.22, Ohio Revised Code set forth in the Notice of Opportunity for Hearing issued by the BOARD on December 14, 1995, attached hereto as Exhibit A and incorporated herein by this reference. 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. The license of KAREN L. PAJARI, M.D., to practice medicine and surgery in the State of Ohio was suspended by operation of law

on October 1, 1994 for failure to renew, and remains suspended at this time.

- D. KAREN L. PAJARI, M.D., ADMITS the factual allegations set forth in the Notice of Opportunity for Hearing issued by the BOARD on December 14, 1995, attached hereto as Exhibit A and incorporated herein by reference. She further admits that such acts constitute a violation of R.C. 4731.22(B)(5) and (B)(8).

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

- I. The certificate of KAREN L. PAJARI, M.D., to practice medicine and surgery in the State of Ohio shall be SUSPENDED for an indefinite period of time, but not less than one year following the effective date of this CONSENT AGREEMENT.
- II. The STATE MEDICAL BOARD shall not consider reinstatement of the certificate of KAREN L. PAJARI, M.D., to practice medicine and surgery in the State of Ohio unless and until all of the following minimum requirements are met:
  - a. KAREN L. PAJARI, M.D., shall submit an application for reinstatement, accompanied by appropriate fees;
  - b. In the event KAREN L. PAJARI, M.D., has not been engaged in the active practice of medicine and surgery for a period in excess of two years prior to application for reinstatement, the BOARD may exercise its discretion under Section 4731.222, Ohio Revised Code, to require evidence of KAREN L. PAJARI, M.D.'s fitness to resume practice;
  - c. KAREN L. PAJARI, M.D., shall provide acceptable documentation of successful completion of a course dealing with personal and professional ethics, such course to be approved in advance by the BOARD.
- III. Upon reinstatement, the certificate of KAREN L. PAJARI, M.D., to practice medicine and surgery in the State of Ohio shall be subject to the following PROBATIONARY terms, conditions, and limitations for a period of at least three (3) years:

- a. **KAREN L. PAJARI, M.D., shall obey all federal, state, and local laws and all rules governing the practice of medicine in Ohio;**
- b. **KAREN L. PAJARI, M.D., shall submit quarterly declarations under penalty of BOARD disciplinary action or criminal prosecution, stating whether there has been compliance with all the conditions of this CONSENT AGREEMENT. The first quarterly declaration must be received in the BOARD's offices on the first day of the third month following the month in which the CONSENT AGREEMENT becomes effective, provided that if the effective date is on or after the 16th day of the month, the first quarterly declaration must be received in the BOARD's offices on the first day of the fourth month following. Subsequent quarterly declarations must be received in the BOARD's offices on or before the first day of every third month;**
- c. **KAREN L. PAJARI, M.D., shall appear in person for quarterly interviews before the BOARD or its designated representative, or as otherwise directed by the BOARD;**

**If an appearance is missed or is rescheduled for any reason, ensuing appearances shall be scheduled based on the appearance date as originally scheduled. (Example: The first quarterly appearance is scheduled for February, but based upon the doctor's serious personal illness she is permitted to delay appearance until April. The next appearance will still be scheduled for May, three months after the appearance as originally scheduled.). Although the BOARD will normally give KAREN L. PAJARI, M.D., written notification of scheduled appearances, it is KAREN L. PAJARI, M.D.'s responsibility to know when personal appearances will occur. If she does not receive written notification from the BOARD by the end of the month in which the appearance should have occurred, KAREN L. PAJARI, M.D., shall immediately submit to the BOARD a written request to be notified of her next scheduled appearance;**

- d. **In the event that KAREN L. PAJARI, M.D., should leave Ohio for three consecutive months or reside or**

practice outside the state, KAREN L. PAJARI, M.D., must notify the BOARD in writing of the dates of departure and return. Periods of time spent outside Ohio will not apply to the reduction of this probationary period unless otherwise determined by motion of the BOARD in instances where the BOARD can be assured that probationary monitoring is otherwise being performed;

- e. In the event KAREN L. PAJARI, M.D., is found by the Secretary of the BOARD to have failed to comply with any provision of this CONSENT AGREEMENT, and is so notified of that deficiency in writing, such periods of noncompliance will not apply to the reduction of the probationary period under this CONSENT AGREEMENT.

- IV. Within thirty (30) days of the effective date of this CONSENT AGREEMENT, KAREN L. PAJARI, M.D., shall provide a copy of this CONSENT AGREEMENT to all employers or entities with which she is under contract to provide physician services or is receiving training; and the Chief of Staff at each hospital where she has, applies for, or obtains privileges or appointment. Further, KAREN L. PAJARI, M.D., shall provide a copy of this CONSENT AGREEMENT to all employers or entities with which she contracts to provide physician services, or applies for or receives training, and the Chief of Staff at each hospital where she applies for or obtains privileges or appointments.
- V. Within thirty (30) days of the effective date of this CONSENT AGREEMENT, KAREN L. PAJARI, 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 she currently holds a license to practice. KAREN L. PAJARI, 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 she applies for licensure or reinstatement of licensure. Further, KAREN L. PAJARI, 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.
- VI. Upon successful completion of probation as evidenced by a written release from the BOARD, the certificate of KAREN L. PAJARI, M.D., to practice medicine and surgery in the State of Ohio shall be fully restored.

**This CONSENT AGREEMENT shall remain in force for a minimum of three (3) years following reinstatement of the certificate of KAREN L. PAJARI, M.D., to practice medicine and surgery in the State of Ohio prior to any request for termination of said CONSENT AGREEMENT. Otherwise, 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 and Supervising Member of THE STATE MEDICAL BOARD OF OHIO, KAREN L. PAJARI, M.D., appears to have violated or breached any terms or conditions 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.**

**KAREN L. PAJARI, M.D., acknowledges that she 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.**

**KAREN L. PAJARI, 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. 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.**

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

Karen Pajari, MD  
KAREN L. PAJARI, M.D.

Thomas E. Gretter, MD  
THOMAS E. GREYTER, M.D.  
Secretary

17 MAY 1996  
DATE

6/12/96  
DATE

KPBYERS  
KEVIN P. BYERS  
Attorney for Karen L. Pajari, M.D.

Raymond J. Albert  
RAYMOND J. ALBERT  
Supervising Member

5/23/96  
DATE

6/12/96  
DATE

Mary K Crawford by Anne Street  
MARY K. CRAWFORD  
Assistant Attorney General  
Attorney for State Medical Board

6/12/96  
DATE



# STATE MEDICAL BOARD OF OHIO

77 South High Street, 17th Floor • Columbus, Ohio 43266-0315 • (614) 466-3934

December 14, 1995

Karen L. Pajari, M.D.  
400 Weslee Way, Apt. 26  
Hazard, KY 41701

Dear Doctor Pajari:

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) During the period beginning on or about July 1, 1989, and continuing until on or about June 30, 1993, you were employed by the Hamilton County Community Mental Health Board (hereinafter, "the Mental Health Board") in the position of Chief Clinical Officer. Your regularly scheduled hours were from 8:30 a.m. to 5:00 p.m. In that position, you were permitted to take "sick leave" which was reimbursable to you at your regular rate of pay. Sick leave accrued at the rate of fifteen (15) days per year. Mental Health Board Policy, as set forth in the Hamilton County Community Mental Health Board Policies, Procedures and Affirmative Action Plan, a copy of which you were provided upon the commencement of your employment, limited sick leave use to the following situations: illness or injury to the employee; funeral for an immediate family member; medical, dental, or optical examination or treatment of the employee or an immediate family member; and care of the employee's immediate family member when required. Further, pursuant to Section 124.38 (C), Ohio Revised Code, sick leave may be used only for absence due to personal illness, pregnancy, injury, exposure to contagious disease which could be communicated to other employees, and to illness, injury, or death in the employee's immediate family.
- (2) While you were employed by the Mental Health Board, you were also employed on a contract basis as a staff psychiatrist by the Pauline Warfield Lewis Center (hereinafter, "PWLC"). That contract provided for pay on an hourly basis without accrual of leave-time or other job benefits.
- (3) On or about the below-listed dates, you claimed and were paid sick leave by the Mental Health Board in the numbers of hours listed in the fourth column. However, on each such date you also billed PWLC for services rendered to that facility during the same time period for which you claimed sick leave. The use of sick leave for time periods during which you were working at PWLC was in violation of the aforementioned Mental Health Board Policy and statutes.

*Mailed 12-14-95*

<b>Date</b>	<b>Time Billed to PWLC</b>	<b>Hours Billed to PWLC</b>	<b>Sick Hours Billed To HCCMHB</b>	<b>PWLC HoursOverlap Normal HCCMHB Hours of 8:30 a.m. - 5:30 p.m.</b>	<b># of Unauthorized Sick Hours Billed to HCCMHB</b>
7/23/91	0600 - 1000	4.0	7.5	0830 - 1000	1.5
7/26/91	0600 - 0900	3.0	3.5	0830-0900	0.5
2/11/92	0630 - 1530 1700 - 1900	9.0 2.0	7.5	0830 - 1530 1700 - 1730	7.5
2/12/92	0630 - 1130	5.0	7.5	0830 - 1130	3.0
2/20/92	0530 - 0830 0830 - 1030 1030 - 1500	3.0 2.0 4.5	3.0	None 0830 - 1030 1030 -1500	2.0 1.0
2/21/92	0530 - 0830 1230 - 1830	3.0 6.0	3.0	None 1230 - 1530	3.0
3/24/92	0530 - 0830 0900 - 1000	3.0 1.0	7.5	None 0900 - 1000	1.0
4/3/92	1700 - 1900	2.0	7.5	1700 - 1730	0.5
4/6/92	1130 - 1530	4.0	7.5	1130 - 1530	4.0
4/8/92	1130 - 1430	3.0	7.5	1130 - 1430	3.0
4/9/92	1030 - 1330	3.0	7.5	1030 - 1330	3.0
4/10/95	0900 - 1330 1700 - 1900	4.5 2.0	7.5	0900 - 1330 1700 - 1730	4.5 0.5
4/17/95	0700 - 1500	8.0	4.5	0830 - 1500	4.5
4/20/92	1200 - 1430	2.5	3.0	1200 - 1430	2.5
4/30/92	0530 - 1230	7.0	2.5	0830 - 1230	2.5
5/4/92	0700 - 1000 1200 - 1430	3.0 2.5	2.5	0830 - 1000 1200 - 1430	1.5 1.0

5/5/92	0600 - 0900 1200 - 1430	3.0 2.5	2.5	0830 - 0900 1200 - 1430	0.5 2.0
5/6/92	0630 - 0930 1200 - 1430	3.0 2.5	2.5	0830 - 0930 1200 - 1430	1.0 1.5
5/26/92	0600 - 1100 1200 - 1500	5.0 3.0	4.0	0830 - 1100 1200 - 1500	2.5 1.5
6/1/92	0600 - 1100 1230 - 1430	5.0 2.0	2.5	0830 - 1100 1230 - 1430	2.5
6/3/92	0600 - 1200 1230 - 1400	6.0 1.5	3.5	0830 - 1200 1230 - 1400	3.5
6/29/92	0600 - 1000	4.5	3.0	0830 - 1000	1.5
6/30/92	0630 - 1030	4.0	4.5	0830 - 1030	2.0
7/6/92	0600 - 1430	8.5	4.5	0830 - 1430	4.5
7/7/92	0630 - 0930 1230 - 1500	3.0 2.5	2.5	0830 - 0930 1230 - 1500	1.0 1.5
7/13/92	0600 - 1100 1200 - 1430	5.0 2.5	3.5	0830 - 1100 1200 - 1430	2.5 1.0
7/21/92	0600 - 1200	6.0	7.5	0830 - 1200	3.5
7/22/92	0530 - 1030	5.0	3.0	0830 - 1030	2.0
10/15/92	0830 - 1230 1630 - 1830	4.0 2.0	7.5	0830 - 1230 1630 - 1730	4.0 1.0
10/26/92	0530 - 1430	9.0	7.5	0830 - 1430	6.0
11/2/92	0600 - 1000 1230 - 1630	4.0 4.0	7.5	0830 - 1000 1230 - 1630	1.5 4.0
11/18/92	0530 - 1030	5.0	7.5	0830 - 1030	2.0
11/23/92	0530 - 1130 1300 - 1430	6.0 1.5	3.5	0830 - 1130 1300 - 1430	3.0 0.5

	1500 - 1600	1.0		1500 - 1600	
11/27/92	0600 - 1430	8.5	4.0	0830 - 1430	4.0
12/9/92	0530 - 0800	2.5	3.5	None	
	0900 - 1300	4.0		0900 - 1300	3.5
1/26/93	0515 - 0915	4.0	3.5	0830 - 0915	0.8

The total amount of money paid to you by the Mental Health Board as a result of this improper use of sick leave exceeded \$14,000.

Your acts, conduct, and/or omissions as alleged in paragraph (3) above, 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.

Further, your acts, conduct, and/or omissions as alleged in paragraph (3) above, individually and/or collectively, constitute "(t)he obtaining of, or attempting to obtain, money or anything of value by fraudulent misrepresentations in the course of practice," as that clause is used in Section 4731.22(B)(8), Ohio Revised Code.

Further, Your acts, conduct, and/or omissions as alleged in paragraph (3) above, individually and/or collectively, constitute "(c)ommission of an act that constitutes a felony in this state regardless of the jurisdiction in which the act was committed," as that clause is used in Section 4731.22(B)(10), Ohio Revised Code, to wit: theft in office, in violation of Section 2921.41, 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.

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.

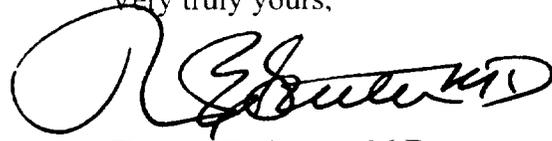
In the event that there is no request for such hearing received within thirty (30) days of the time of mailing of this notice, the State Medical Board may, in your absence and upon consideration of this matter, determine whether or not to limit, revoke, suspend, refuse to register or reinstate your certificate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

Karen L. Pajari, M.D.

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Copies of the applicable sections are enclosed for your information.

Very truly yours,

A handwritten signature in black ink, appearing to read 'T. Gretter', written in a cursive style.

Thomas E. Gretter, M.D.  
Secretary

TEG/jag

Enclosures:

CERTIFIED MAIL #P 348 887 225

RETURN RECEIPT REQUESTED