**CONSENT AGREEMENT**
**BETWEEN**
**GURDEEP SINGH, M.D.**
**AND**
**THE STATE MEDICAL BOARD OF OHIO**

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

GURDEEP SINGH, M.D., enters into this AGREEMENT being fully informed of his rights under Ohio Revised Code Chapter 119, 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 Ohio Revised Code Section 4731.22(B) 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 enumerated subsections.

B. The STATE MEDICAL BOARD OF OHIO enters into this Consent Agreement in lieu of further formal proceedings based upon the Notice of Opportunity for Hearing dated October 9, 1991, a copy of which is attached hereto as "Exhibit A" and incorporated herein, and expressly reserves the right to institute formal proceedings based upon any other violations of Ohio Revised Code Chapter 4731, whether occurring before or after the effective date of this AGREEMENT.

C. GURDEEP SINGH, M.D., is licensed to practice medicine and surgery in the State of Ohio.

D. GURDEEP SINGH, M.D., admits the factual allegations stated in the Notice of Opportunity for Hearing dated October 9, 1991.

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

1. GURDEEP SINGH, M.D.,s certificate to practice medicine and surgery is hereby SUSPENDED for fifteen (15) days. The suspension shall begin thirty (30) days from the effective date of this agreement. Such suspension is subject to the following probationary terms, conditions and limitations;

   a. DR. SINGH shall obey all federal, state and local laws, and all rules governing the practice of medicine in Ohio.

   b. DR. SINGH shall submit quarterly declarations under penalty of perjury stating whether or not there has been compliance with all the provisions of probation, a sample copy of which is attached hereto as "Exhibit B."

   c. In the event that DR. SINGH should leave Ohio for three (3) consecutive months, or reside or practice outside the State, he must notify the STATE MEDICAL BOARD in writing of the dates of departure and return. Periods of time spent outside of Ohio will not apply to the reduction of this probationary period.

   d. DR. SINGH shall provide acceptable documentation of successful completion of a pharmacology course, to be approved in advance by the Board. The pharmacology course shall be taken at the expense of Dr. Singh.

   e. DR. SINGH shall not prescribe, order or dispense any controlled substances until he sucessfully completes the pharmacology course, approved by the Board.

   f. During the three (3) year probationary period, as stated in paragraph i, DR. SINGH shall not prescribe any controlled substances to himself, his wife or his family. After the probationary period, DR.

SINGH shall only prescribe medications to himself, his wife or his family in accordance with Board policy.

g. DR. SINGH shall continue to be monitored by Dr. Bhumbra and Dr. Roberts as to his course of treatment for his allergy.

h. DR. SINGH shall consult with such physicians of such specialty as the Board may request.

i. DR. SINGH shall be on probation for three (3) years. The probation shall begin on the effective date of the CONSENT AGREEMENT.

j. This CONSENT AGREEMENT shall terminate in three (3) years from its effective date, provided that DR. SINGH fulfills the probationary terms, conditions and limitations specified in paragraphs a-i.

The effective date of this AGREEMENT shall be on the date of the last signature below.

DR. SINGH shall provide all employers and the Chief of Staff at each hospital where he has, applies for, or obtains privileges with a copy of this CONSENT AGREEMENT during the term of this AGREEMENT.

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 STATE MEDICAL BOARD OF OHIO, DR. SINGH 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. No act or omission by DR. SINGH which occurs prior to the effective date of this AGREEMENT shall constitute a breach or violation of this AGREEMENT.

DR. SINGH 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, Ohio Revised Code Chapter 119.

DR. SINGH hereby releases the STATE MEDICAL BOARD OF OHIO, it 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 Ohio Revised Code Section 149.43, and shall become effective upon the last date of signature below. Further, this information may be reported by the Board to appropriate organizations, data banks and governmental bodies.

GURDEEP SINGH, M.D.

Feb 7, 1992
DATE

REGINALD JACKSON, Jr., Esq.
Attorney for Gurdeep Singh, M.D.

Feb. 7, 1992
DATE

HENRY G. CRAMBLETT, M.D.
Secretary

2/12/92
DATE

TIMOTHY S. JOST, Esq.
Supervising Member

2/12/92
DATE

ODELLA LAMPKIN
Assistant Attorney General

2/12/92
DATE

3365S

STATE'S EXHIBIT
A

# STATE MEDICAL BOARD OF OHIO

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

October 9, 1991

Gurdeep Singh, M.D.
2409 Cherry Street
Suite 203
Toledo, OH 43608

Dear Doctor Singh:

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) As reflected by the Prescription List, you prescribed the following controlled substances to yourself and Patient 1, as identified in the attached Patient Key, (Key confidential -- not for public disclosure). However, you failed to maintain any medical records regarding this prescribing.

PRESCRIPTION LIST

| | Date | Controlled Substance | Amount |
|---|---|---|---|
| Gurdeep Singh | 05/22/89 | Fiorinal w/Cod. #3 | 30 |
| | 06/11/89 | Fiorinal w/Cod. #3 | 30 |
| | 06/23/89 | Fiorinal w/Cod. #3 | 40 |
| | 07/18/89 | Fiorinal w/Cod. #3 | 40 |
| | 08/15/89 | Fiorinal w/Cod. #3 | 40 |
| | 09/09/89 | Fiorinal w/Cod. #3 | 40 |
| | 10/02/89 | Fiorinal w/Cod. #3 | 40 |
| | 10/23/89 | Fiorinal w/Cod. #3 | 40 |
| | 12/06/89 | Fiorinal w/Cod. #3 | 40 |

October 9, 1991

| | Date | Controlled Substance | Amount |
|---|---|---|---|
| Gurdeep Singh (cont.) | 12/15/89 | Fiorinal w/Cod. #3 | 40 |
| | 01/13/90 | Fiorinal w/Cod. #3 | 40 |
| | 01/23/90 | Fiorinal w/Cod. #3 | 40 |
| | 02/01/90 | Fiorinal w/Cod. #3 | 40 |
| [illegible] | 02/06/90 | Fiorinal w/Cod. #3 | 40 |
| | 02/25/90 | Fiorinal w/Cod. #3 | 40 |
| | 03/07/90 | Fiorinal w/Cod. #3 | 40 |
| | 03/27/90 | Fiorinal w/Cod. #3 | 40 |
| | 04/03/90 | Fiorinal w/Cod. #3 | 40 |
| | 04/04/90 | Fiorinal w/Cod. #3 | 40 |
| | 04/29/90 | Fiorinal w/Cod. #3 | 40 |
| | 05/10/90 | Fiorinal w/Cod. #3 | 40 |
| | 05/19/90 | Fiorinal w/Cod. #3 | 40 |
| | 05/29/90 | Fiorinal w/Cod. #3 | 40 |
| | 06/05/90 | Fiorinal w/Cod. #3 | 40 |
| | 06/23/90 | Fiorinal w/Cod. #3 | 40 |
| | 07/01/90 | Fiorinal w/Cod. #3 | 40 |
| | 07/10/90 | Fiorinal w/Cod. #3 | 40 |
| | 07/19/90 | Fiorinal w/Cod. #3 | 40 |
| | 07/27/90 | Fiorinal w/Cod. #3 | 40 |
| | 08/04/90 | Fiorinal w/Cod. #3 | 40 |
| | 08/24/90 | Fiorinal w/Cod. #3 | 40 |
| | 09/01/90 | Fiorinal w/Cod. #3 | 40 |
| | 09/08/90 | Fiorinal w/Cod. #3 | 40 |
| | 09/16/90 | Fiorinal w/Cod. #3 | 40 |
| | 09/23/90 | Fiorinal w/Cod. #3 | 40 |
| | 10/05/90 | Fiorinal w/Cod. #3 | 40 |
| | 10/27/90 | Fiorinal w/Cod. #3 | 40 |
| | 11/03/90 | Fiorinal w/Cod. #3 | 40 |
| | 11/10/90 | Fiorinal w/Cod. #3 | 40 |
| | 11/26/90 | Fiorinal w/Cod. #3 | 40 |
| | 12/05/90 | Fiorinal w/Cod. #3 | 40 |
| | 12/14/90 | Fiorinal w/Cod. #3 | 40 |
| | 12/23/90 | Fiorinal w/Cod. #3 | 40 |
| | 01/11/91 | Ativan 1 mg. | 30 |

October 9, 1991

| | Date | Controlled Substance | Amount |
|---|---|---|---|
| Gurdeep Singh (cont.) | 02/03/91 | Fiorinal w/Cod. #3 | 40 |
| | 02/18/91 | Fiorinal w/Cod. #3 | 40 |
| | 03/03/91 | Fiorinal w/Cod. #3 | 40 |
| | 03/15/91 | Fiorinal w/Cod. #3 | 40 |
| | 03/22/91 | Fiorinal w/Cod. #3 | 40 |
| Patient 1 | 06/30/89 | Tylenol w/Cod. #3 | 60 |
| | 11/27/89 | Tylenol w/Cod. #3 | 60 |
| | 02/04/90 | Tylenol w/Cod. #3 | 60 |
| | 04/05/90 | Tylenol w/Cod. #3 | 60 |
| | 07/31/90 | Tylenol w/Cod. #3 | 60 |
| | 09/19/90 | Tylenol w/Cod. #3 | 60 |
| | 11/07/90 | Tylenol w/Cod. #3 | 60 |
| | 12/29/90 | Tylenol w/Cod. #3 | 60 |
| | 01/11/91 | Tylenol w/Cod. #3 | 60 |
| | 02/07/91 | Tylenol w/Cod. #3 | 60 |

Your acts, conduct, and/or omissions as alleged in paragraph (1) above, individually and/or collectively constitute "(v)iolating or attempting to violate, directly or indirectly, or assisting in or abetting the violation of, or conspiring to violate, any provisions of this chapter or any rule promulgated by the board," as that clause is used in Section 4731.22(B)(20), Ohio Revised Code, to wit: Rule 4731-11-02(D), Ohio Administrative Code. Pursuant to Rule 4731-11-02(F), Ohio Administrative Code, a violation of Rule 4731-11-02(D), Ohio Administrative Code, also violates Sections 4731.22(B)(2) and (6), 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.

Copies of the applicable sections are enclosed for your information.

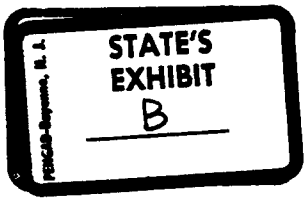
Very truly yours,

Henry G. Cramblett, M.D.
Secretary

HGC:jmb
Enclosures:

CERTIFIED MAIL #P 055 328 944
RETURN RECEIPT REQUESTED

cc: Reginald S. Jackson, Jr.
CONNELLY, SOUTAR & JACKSON
2100 Ohio Citizens Bank Bldg.,
Toledo, OH 43604




Henry G. Cramblett, M.D.
SECRETARY, STATE MEDICAL BOARD OF OHIO
77 South High Street
Columbus, Ohio 43215

Dear Dr. Cramblett:

I hereby declare under penalty of perjury that I have complied with the terms of the Consent Agreement that I entered into with the State Medical Board on _____, 1992 for the quarter beginning _____ and ending _____
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Thank you.

Very truly yours,

GURDEEP SINGH, M.D

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